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Nuclear Licensing Director

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Docket Nos.: 50-321
50-366

NL-12-1111

U. S. Nuclear Regulatory Commission
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11555 Rockville Pike
Rockville, MD 20852

Edwin I. Hatch Nuclear Plant – Units 1 and 2
Emergency Preparedness Information Requested by NRC Letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Daiichi Accident*

- Reference: 1. NRC Letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Daiichi Accident*, dated March 12, 2012
2. Southern Nuclear Operating Company letter to NRC, *60-Day Response to NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Daiichi Accident*, dated March 12, 2012, dated May 9, 2012 (Letter NL-12-0797)

Ladies and Gentlemen:

On March 12, 2012, the NRC staff issued Reference 1 to all power reactor licensees and holders of construction permits in active or deferred status. Enclosure 5 of the letter contains specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness (EP) programs. In accordance with 10 CFR 50.54, "Conditions of Licenses," paragraph (f), addressees were requested to submit a written response to the information requests. The letter also provided requested due dates for written responses.

In accordance with Reference 1, on May 9, 2012, Southern Nuclear Operating Company submitted Reference 2, an alternative course of action for providing the requested information. The alternative course of action included revised information due dates and the basis for those dates. As described in our

alternative course of action, this letter transmits to you the responses to the following information requests.

- Reference 1, Enclosure 5, Communications request #2
- Reference 1, Enclosure 5, Staffing request #3
- Reference 1, Enclosure 5, Staffing request #4
- Reference 1, Enclosure 5, Staffing request #5

This letter contains no NRC commitments. If you have any questions, please contact Jack Stringfellow at (205) 992-7037.

Mr. M. J. Ajluni states he is Nuclear Licensing Director of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and, to the best of his knowledge and belief, the facts set forth in this letter are true.

Sworn to and subscribed before me this 11th day of June, 2012.

Nancy Louise Henderson
Notary Public

My commission expires: March 23, 2014

Respectfully submitted,

Mark J. Ajluni
M. J. Ajluni
Nuclear Licensing Director



MJA/CLN/lac

Enclosures: 1. Emergency Preparedness 90 Day Response to the Request for Information Regarding Recommendation 9.3 of the Near Term Task Force

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cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Mr. D. R. Madison, Vice President – Hatch
Mr. B. L. Ivey, Vice President – Regulatory Affairs
Mr. B. J. Adams, Vice President – Fleet Operations
RTYPE: CHA02.004

U. S. Nuclear Regulatory Commission
Mr. V. M. McCree, Regional Administrator
Mr. P. G. Boyle, NRR Senior Project Manager – Hatch
Mr. E. D. Morris, Senior Resident Inspector – Hatch

**Edwin I. Hatch Nuclear Plant – Units 1 and 2
Emergency Preparedness Information Requested by NRC Letter, *Request
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Task Force Review of Insights from the Fukushima Daiichi Accident***

Enclosure 1

**Emergency Preparedness 90 Day Response to the Request for Information
Regarding Recommendation 9.3 of the Near Term Task Force**

Emergency Preparedness 90 Day Response to the Request for Information (RFI) Regarding Recommendation 9.3 of the Near Term Task Force

Communications:

RFI 2 – Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.

Southern Nuclear Operating Company (SNC) has performed a preliminary assessment of communications systems and confirmed that existing installed systems have adequate backup power supplies that would be expected to be available during a loss of ac power, but have identified actions to further enhance communications capabilities after a large scale natural event.

Three (3) battery-operated satellite phones, including extra batteries and chargers, have been purchased and received, for use by emergency response personnel for onsite and offsite communications. These units will also be utilized to contact the Emergency Operations Facility (EOF). The EOF has full communications capability with applicable offsite agencies and is located outside the 25 mile area. The EOF is staffed and trained to perform emergency notifications and has the capability to initiate request of supporting agencies to respond to the event. Two additional satellite phones, including extra batteries and chargers have been purchased and deployed for emergency response in the Emergency Operations Facility (EOF). Each satellite phone has the ability to support a single phone line. These satellite phones will be used as an interim measure until the completion of the communications assessment and implementation of a long term solution for on-site and off-site communications.

SouthernLINC and/or Kenwood radios are utilized for onsite response teams utilizing "talk around". This feature provides push to talk service between individual or group radios via private 2-way and/or group radio connections. This mode provides radio communication without the need for local towers or transport systems. Additional communications capability is available through the use of sound powered phones.

Portable generators will be procured to supply power to onsite communications equipment. These generators will have onboard fuel supplies and be capable of being refueled from the EDG Day tanks. Purchase orders for the portable generators have been issued.

Staffing:

RFI 3 – Identify how the augmented staff would be notified given degraded communications capabilities.

Satellite communications can be utilized to activate the Emergency Response Organization (ERO) using the existing callout service provided by DCC/NXT. The service provider is located more than 25 miles from the site and provides

geographically diverse call center locations and back-up capability. Once activated, the system initiates notification to ERO personnel via voice, text messaging, and email to all devices registered for the individual ERO member (e.g., phone, pager, smart phone, etc.). This method will reach ERO members outside the 25-mile zone, as well as a portion of the ERO with notification coverage (device dependent) within the fringes of the 25-mile zone. Additional ERO members will be notified as communications infrastructure is returned to service through the affected area.

Initial expectations will be communicated to the ERO to respond to their assigned emergency response facilities when made aware of an area-wide loss-of-grid by October 30, 2012. This will be included in the ERO annual requalification training program by December 12, 2012.

RFI 4 – Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.

Various types of transport to Plant Hatch are applicable including: walking, personal vehicle, helicopter, and boat.

SNC currently has a written agreement with the Georgia Emergency Management Agency (GEMA) to obtain logistical support in the event of a large-scale natural disaster that inhibits site access. GEMA is the central coordinating agency for all state, local, and federal resources, including mutual aid in Georgia. This includes clearing of access roads as conditions warrant, water and air transportation support, etc., as needed. The agreement is being revised to specifically identify the need for assistance such as transportation of emergency responders to designated emergency response facilities in the event of a large-scale natural disaster that inhibits site access and clearing of access roads, as conditions warrant. SNC anticipates that any applicable agreements will be verified or updated by October 30, 2012.

In support of these agreements, SNC is establishing staging areas to be used by the emergency responders as common locations for transport to the affected site. Areas under consideration include the current alternate assembly areas, as well as strategic public centers (schools, shopping centers, etc.). The selected areas will be identified by October 30, 2012.

SNC is preparing for the potential that site access will be unavailable for the first six hours following the postulated natural disaster. If the site is inaccessible due to the event (e.g. bridges damaged, roads blocked with debris, etc.) emergency responders for the affected site will be expected to assemble at the pre-designated muster points. Communications protocols established in conjunction with the planned memoranda/agreements with the associated State(s) will be invoked to coordinate the dispatch of transportation appropriate for the specific event (e.g., helicopter, ATV, boat, etc.).

SNC will also depend on the Nuclear Regulatory Commission (NRC) and the implementation of the National Incident Response Plan to coordinate mutual aid from federal agencies in the event water or air assets are needed to transport emergency responders or equipment from a designated off-site location to the site.

The following agreements are already in-place for assistance and/or services:

- Georgia Emergency Management Agency
- Appling County Emergency Management
- Tattnall County Emergency Management
- Toombs County Emergency Management
- Jeff Davis County Emergency Management
- Department of Energy, Savannah River Office
- Institute of Nuclear Power Operations (INPO)

RFI 5 – Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.

SNC is currently assessing initial on-shift ERO staffing at Plant Hatch for design-basis event conditions in response to the requirements of changes to 10CFR Part 50, Appendix E, Section 4(a)(i), by December 24, 2012. Although limited to the time following a design-basis event initiation until the on-shift ERO is augmented, this assessment is expected to provide an initial indication of the adequacy of staffing to respond to beyond design-basis events.

SNC plants routinely maintain a 3 – day food supply in the onsite cafeteria. Additionally, a purchase order has been issued for a dedicated supply of food and water to support an extended presence of emergency workers.