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10 CFR 50.4

10 CFR 50.54(f)

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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324 / RENEWED LICENSE NOS. DPR-71 AND DPR-62

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT
DOCKET NO. 50-302 / LICENSE NO. DPR-72

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1
DOCKET NO. 50-400 / RENEWED LICENSE NO. NPF-63

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261 / RENEWED LICENSE NO. DPR-23

SUBJECT: CAROLINA POWER & LIGHT COMPANY AND FLORIDA POWER CORPORATION'S RESPONSE TO 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 DAI-ICHI ACCIDENT; DATED MARCH 12, 2012

REFERENCES:

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, 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident*, dated March 12, 2012
2. Progress Energy Letter, *Carolina Power & Light Company and Florida Power Corporation's 60-Day Response to the March 12, 2012, Request for Information Regarding Enclosure 5, Recommendation 9.3: Emergency Preparedness*, dated May 9, 2012
3. Progress Energy Letter, *Carolina Power & Light Company and Florida Power Corporation's 90-Day Response to the March 12, 2012, Request for Information Regarding Enclosure 5, Recommendation 9.3: Emergency Preparedness*, dated June 11, 2012
4. NEI 12-01, *Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities*

Ladies and Gentlemen:

The NRC staff issued Reference 1 on March 12, 2012. Enclosure 5 of Reference 1 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 written responses to the information request on requested due dates.

In accordance with Reference 1, on May 9, 2012, Carolina Power & Light Company (CP&L) and Florida Power Corporation (FPC) submitted, via 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 the alternative course of action, this letter transmits the information required for the Phase 1 Communications Assessment (Communications Request #1) and an implementation schedule of the time needed to implement the results (Communications Request #3).

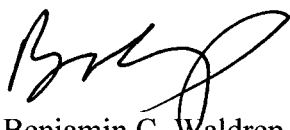
Attachment 1 provides information applicable to all of the sites listed above. Attachments 2 through 5 provide the requested plant specific information for each site listed above. The information provided was developed in accordance with the guidance provided in Reference 4.

This letter contains no new commitments. Any actions discussed in this document should be considered intended or planned actions.

Should you have any questions concerning this letter, or require additional information, please contact Donna Alexander, Nuclear Regulatory Affairs Manager, at (919) 546-5357.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 31, 2012.

Respectfully,



Benjamin C. Waldrep
Vice President – Corporate Governance &
Operations Support

JLO

Attachments:

1. Communication Assessment Results and Implementation Schedule for CP&L and FPC Nuclear Sites
2. Emergency Communications Assessment Rollup for Brunswick Steam Electric Plant, Unit Nos. 1 and 2
3. Emergency Communications Assessment Rollup for Crystal River Unit 3 Nuclear Generating Plant
4. Emergency Communications Assessment Rollup for Shearon Harris Nuclear Power Plant Unit No. 1
5. Emergency Communications Assessment Rollup for H.B. Robinson Steam Electric Plant Unit No. 2

cc: USNRC Region II, Regional Administrator
USNRC Resident Inspector – BSEP, Unit Nos. 1 and 2
USNRC Resident Inspector – CR3
USNRC Resident Inspector – SHNPP, Unit No. 1
USNRC Resident Inspector – HBRSEP, Unit No. 2
F. Saba, NRR Project Manager – BSEP, Unit Nos. 1 and 2; CR3
A. T. Billoch Colón, NRR Project Manager – SHNPP, Unit No. 1; HBRSEP, Unit No. 2

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Attachment 1

**Communication Assessment Results and Implementation Schedule for
CP&L and FPC Nuclear Sites**

Carolina Power & Light Company (CP&L) and Florida Power Corporation (FPC) did not try to assess the survivability of primary or backup communications systems described in the Emergency Plan (E-Plan) or Emergency Plan Implementing Procedures (EPIPs) during a beyond design basis extended loss of alternating current (AC) power event. Instead, CP&L & FPC elected to conservatively assume that such communication systems would not be relied upon during a beyond design basis extended loss of AC power event. As a result of this assessment, no improvements will be made to *existing* onsite and offsite communications systems and their required normal and/or backup power supplies.

During a beyond design basis extended loss of AC power event, onsite communications can be established via existing hand-held radios (line-of-sight) and offsite communications via recently purchased hand-held satellite phones. In addition, small generators were purchased for each site. These portable generators can be used to power hand-held radio battery chargers and hand-held satellite phone battery chargers. The hand-held satellite phones and small generators are onsite. The hand-held satellite phones and small generators are being incorporated into site programs and procedures (Recommendation R-4, below). Storage to maximize the survivability of the hand held radios and chargers, satellite phones and chargers, and small generators will be addressed consistent with the NEI 12-01, Section 4.5 (Recommendation R-3, below).

The following recommendations (enhancements), including their implementation dates, were identified:

R-1: Ensure that an appropriate inventory of portable hand-held satellite phones, spare batteries, and chargers is available for use by the Emergency Response organization.

Due Date: 3/28/2013

R-2: Evaluate and purchase, if necessary, additional portable radios, spare batteries, and chargers to ensure required communications links are fully established.

Due Date: 3/28/2013

R-3: Ensure that portable communications equipment (i.e., satellite phones, radios, and small generators) are stored in a manner that maximizes survivability from applicable external events per NEI 12-01, Section 4.5.
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Due Date: Consistent with the implementation due date for Order EA-12-049.

R-4: Ensure that programmatic controls are established for communications equipment (i.e., portable satellite phones and portable radios) to ensure availability and reliability, including the performance of periodic inventory checks and operability testing per NEI 12-01, Section 4.8. Also, provide training on the locations and use of communications

systems and equipment (NEI 12-01, Section 4.11).
Due Date: 9/30/2013

R-5: Ensure that programmatic controls are established for the Government Emergency Telecommunications Service (GETS)/Wireless Priority Service (WPS) programs
Due Date: 3/28/2013

R-6: Ensure that arrangements are in place with communications service providers to utilize their emergency services as described in NEI 12-01, Section 4.10.
Due Date: 9/20/2013

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Attachment 2

Emergency Communications Assessment Rollup for

**Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Docket Nos. 50-325 and 50-324 / Renewed License Nos. DPR-71 and DPR-62**

Consistent with emergency planning standard requirements, communications systems and equipment associated with the following emergency response functions should be available during an extended loss of AC power. Availability should be determined after a review of existing capabilities consistent with the assumptions of NEI 12-01, Revision 0, Section 2. In particular, it is important that the primary and backup (if applicable) power source for each communications system or piece of equipment be identified. Endpoint equipment identified for a communications link listed below should be used solely for the purpose indicated. For example, a satellite telephone assigned to the Control Room should not be credited for performing both Offsite Response organization (ORO) and NRC notifications.

4.1.1 Notifications to, and communications with, Offsite Response Organizations (OROs) [per 10 CFR 50 Appendix E, Sections IV.D and IV.E.9.a]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed Large Scale External Event (LSEE)?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Control Room	1 per Control Room for Shift Communicator	Selective Signaling System	Assumed Not Available	Commercial telephone, BNP PBX telephones, Security radio link to Brunswick County Sheriff's Dept., Satellite radio; Statewide Emergency Communication Network (SECN), Satellite telephone (1 fixed)	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

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Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed Large Scale External Event (LSEE)?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Technical Support Center ² (TSC)	1 for Key TSC Communicator	Selective Signaling System	Assumed Not Available	Commercial telephone, BNP PBX telephones, Security radio link to Brunswick County Sheriff's Dept., Satellite radio, Statewide Emergency Communication Network (SECN)	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Emergency Operations Facility (EOF)	1 for Key EOF Communicator	Selective Signaling System	Assumed Not Available	Commercial telephone, BNP PBX telephones, State Decision Line – State and County EOC's, Security radio link to Brunswick County Sheriff's Dept., Cellular telephones, Satellite radio; Statewide Emergency	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed Large Scale External Event (LSEE)?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
				Communication Network (SECN), Satellite telephone (1 fixed and 2 portable), MOU w/Brunswick County - Interoperability Mobile Communications Vehicle			

NOTES:

1. The phrase “Described in the E-Plan” refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)
2. If applicable per site Emergency Plan

4.1.2 Notifications to, and communications with, the Nuclear Regulatory Commission (NRC) Headquarters Incident Response Center and the appropriate NRC Regional Office Operations Center [per 10 CFR 50 Appendix E, Sections IV.D and IV.E.9.d]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Control Room	1 per Control Room for ENS Communicator	ENS Phone	Assumed Not Available	BNP PBX telephones, Satellite telephone (1 fixed), Commercial telephone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Technical Support Center (TSC)	1 for ENS Communicator	ENS Phone	Assumed Not Available	BNP PBX telephones, Satellite telephone (fixed and portable units available), Commercial telephone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Location(s) where HPN communications are performed	1 for HPN Communicator	HPN Phone	Assumed Not Available	BNP PBX telephones, Satellite telephone (1 fixed and 2 portable units available in EOF), Commercial telephone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.3 Communications between licensee emergency response facilities [per 10 CFR 50 Appendix E, Section IV.9.c. Additional links that support performance of critical response functions are also specified.]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Control Room	1 per unit	PBX telephone	Assumed Not Available	ARD, Satellite telephone (1 fixed), Commercial telephone, Site PA, Radios	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Technical Support Center (TSC)	1 each for: <ul style="list-style-type: none"> • Senior/Lead TSC Manager • Operations Coordination • Maintenance Coordination • Engineering Coordination • Radiological Support Additional response coordination links for multi-unit sites:	PBX telephone	Assumed Not Available	ARD, Commercial telephone, Site PA, Radios	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

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Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
	<ul style="list-style-type: none"> • 1 for each position providing Unit Response Coordination. 						
Operational Support Center (OSC)	1 each for: <ul style="list-style-type: none"> • Senior/Lead OSC Manager • Radiological Support Additional response coordination links for multi-unit sites: <ul style="list-style-type: none"> • 1 for each position providing Unit In-Plant Team Coordination. 	PBX telephone	Assumed Not Available	Commercial telephone, Site PA, Radios	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Emergency Operations Facility (EOF)	1 each for: <ul style="list-style-type: none"> • Senior/Lead Manager • Key Protective Measures • Operations or Technical 	PBX telephone	Assumed Not Available	Commercial Telephone System, Corporate Telephone Communication System (Voicenet),	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
	Support (as needed to support performance of dose projections, formulation of PARs and plant status updates to ORO authorities).			Cellular telephones, Satellite phones, 800 MHz Radios			
Joint Information Center (JIC)	1 for Senior Manager	Commercial telephone	Assumed Not Available	Cellular Telephones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.4 Communications with field/offsite monitoring teams [per 10 CFR 50 Appendix E, Section IV.9.c]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Primary location where	Field/offsite monitoring team	Radio	Yes	Plant PBX Telephone System,	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

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Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
field/offsite monitoring team coordination is performed	coordination			Commercial Telephone, Corporate Telephone Communication System (Voicenet), Plant Public Address System (Plant PA), Cellular telephones			
Primary location from which field/offsite monitoring teams are deployed	1 for each field/offsite monitoring team	Radio	Yes	Cellular telephones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.5 Communications with other Federal agencies as described in the site emergency plan (e.g., the US Coast Guard) [per 10 CFR 50 Appendix E, Section IV.9.b]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Primary location where communication with Federal agencies is performed	Coordination with Federal agencies	PBX telephone	Assumed Not Available	Cellular telephones, Satellite telephone (1 fixed and 2 portable available), Radios	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.6 Coordination and direction of on-site and in-plant response teams.

4.1.6.1 Phase 1 Assessment

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
On-shift staff	Number necessary for the on-shift staff to perform Initial Phase coping actions	Radio & PA	Radio - Yes PA – Assumed Not Available	Site PA, BNP PBX telephones, Bull horn	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Operational Support Center (OSC) and other site-specific locations as necessary	1 each for: <ul style="list-style-type: none"> • Onsite radiological monitoring 2 each for: <ul style="list-style-type: none"> • Firefighting (1 for brigade leader & 1 for the brigade) 2 each per unit for: <ul style="list-style-type: none"> • In-plant radiological monitoring • Search and Rescue • Emergency repairs Site-specific number needed to implement any 2 severe accident mitigation strategies	Radio	Yes	Site PA, BNP PBX telephones, Bull horn	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.2 Plant Paging

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
N/A	See assumptions and discussion in NEI 12-01	PA System	Assumed Not Available	Bullhorns, Sound Powered Phones, Two way radios	Yes	No	N/A

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.3 Communications Equipment at ORO Facilities

Emergency Response Facility	Minimum Communication Links	Primary Method	Primary Method Available Assumed LSEE?	Backup Method(s)	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Brunswick Co. WP/EOC	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial Telephone System, Plant PBX Telephone System, State Decision Line (EOF only), Radio links, Satellite phone,	Assumed Not Available	Portable Satellite Phone	N/A

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Emergency Response Facility	Minimum Communication Links	Primary Method	Primary Method Available Assumed LSEE?	Backup Method(s)	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
				Cell Phones			
New Hanover Co. WP/EOC	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial Telephone System, Plant PBX Telephone System, State Decision Line (EOF only), Radio links, Satellite phone, Cell Phones	Assumed Not Available	Portable Satellite Phone	N/A
State WP & State EOC	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial Telephone System, Plant PBX Telephone System, State Decision Line (EOF only), Radio links, Satellite phone, Cell Phones	Assumed Not Available	Portable Satellite Phone	N/A
US Coast Guard	1 for key communicator	Selective Signaling System	Assumed Not Available	Commercial Telephone System,	Assumed Not Available	Portable Satellite Phone	N/A

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Emergency Response Facility	Minimum Communication Links	Primary Method	Primary Method Available Assumed LSEE?	Backup Method(s)	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
				Plant PBX Telephone System, State Decision Line (EOF only), Radio links, Satellite phone, Cell Phones			

Considerations for performing the communications assessment and identifying enhancements:

4.4 NOTIFICATION OF THE EMERGENCY RESPONSE ORGANIZATION (ERO)

CP&L has implemented a new ERO self-activation process as follows:

During an electrical grid disturbance (i.e., large scale natural disaster, regional blackout, technological disaster, etc.) communications capabilities (i.e., pagers, cell phones, internet, landline telephone systems, etc.) may be lost or severely degraded. ERO members, regardless of on-call status, are expected to monitor local radio, and emergency alert system (EAS) communications for impact to the grid structure.

Should the situation appear to be a major disturbance to the power grid, then:

- Ensure your home and family are safe, and
- If you are fit for duty and able to leave your family unattended, then
- Report to your designated emergency response facility (ERF).

4.5 EQUIPMENT LOCATION REQUIREMENTS

CP&L conservatively assumed that primary communication systems and equipment for onsite and offsite communications capabilities during a beyond design basis extended loss of AC power event would not be relied upon. Given that assumption, alternate communications systems and equipment must be stored in a location, and maintained in a manner, that maximizes survivability following a beyond design basis external event. For example, equipment locations requirements should satisfy the guidance in NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Section 4.5. Moreover, CP&L and FPC should ensure adequate power supplies for the alternate communications systems and equipment.

The adequacy of equipment storage and locations is ongoing, and is yet to be finalized. Therefore, CP&L identified a recommendation/enhancement in this area. Refer to Attachment 1, Recommendation R-3.

4.6 PERFORMANCE CHARACTERISTICS

NEI 12-01 (section 2.4.7) states: "Offsite infrastructure supporting communications systems is inoperable in the area surrounding the site (e.g., cellular telephone or microwave towers, telephone central office buildings, telephone lines, etc.). For this assessment, the company has elected to "apply a default distance value, in all directions, of approximately 25 miles from the plant site." Based on these assumptions, satellite-based communications systems can be utilized to provide offsite communications.

CP&L has purchased additional hand-held satellite phones and they have been delivered to the site and dedicated for usage by the Emergency Response Organization at their associated Emergency Response Facilities. These satellite phones are being incorporated into site programs and procedures. This minimizes any reliance on “multi-use” equipment. Refer to Attachment 1, Recommendation R-4.

4.7 OTHER ASSESSMENT CONSIDERATIONS

Pursuant to the information previously provided in *Carolina Power & Light Company and Florida Power Corporation's 90-day Response to the March 12, 2012, Request for Information Regarding Enclosure 5, recommendation 9.3 Emergency Preparedness*, dated June 11, 2012, via Reference 3:

CP&L has purchased small portable generators for each site that can be used to power handheld radio chargers and portable satellite phone chargers. In addition, CP&L has purchased additional satellite phones that utilize a battery power source to increase the overall diversity of the communication system power supplies. CP&L will ensure an appropriate inventory of portable hand-held satellite phones and radios, spare batteries, and chargers, is available for use by the Emergency Response Organization. Refer to Attachment 1, Recommendations R-1 and R-2.

4.8 QUALITY AND MAINTENANCE-RELATED REQUIREMENTS

Brunswick's E-Plan and its E-Plan Implementing Procedures provide programmatic controls for communications equipment, and related power sources and infrastructure. Similar programmatic controls should be applied to other communications-related equipment to ensure availability and reliability, including the performance of periodic inventory checks and operability testing. Refer to Attachment 1, Recommendation R-4.

4.9 NATIONAL COMMUNICATIONS SYSTEM (NCS) SERVICES

CP&L will ensure that a Government Emergency Telecommunications Service (GETS) account is established and that the account is verified annually. Refer to Attachment 1, Recommendation R-5.

4.10 COMMUNICATIONS PROVIDER EMERGENCY SERVICES

CP&L is in the process of evaluating the emergency services offered by communication service providers. CP&L will ensure that arrangements are in place with communications service providers to utilize their emergency services as described in NEI 12-01, Section 4.10. Refer to Attachment 1, Recommendation R-6.

4.11 PERSONNEL TRAINING

Appropriate training will be developed for and provided to response personnel on the location and use of communications systems and equipment. Refer to Attachment 1, Recommendation R-4.

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Attachment 3

Emergency Communications Assessment Rollup for

**Crystal River Unit 3 Nuclear Generating Plant
Docket No. 50-302 / License No. DPR-72**

Consistent with emergency planning standard requirements, communications systems and equipment associated with the following emergency response functions should be available during an extended loss of AC power. Availability should be determined after a review of existing capabilities consistent with the assumptions of NEI 12-01, Revision 0, Section 2. In particular, it is important that the primary and backup (if applicable) power source for each communications system or piece of equipment be identified. Endpoint equipment identified for a communications link listed below should be used solely for the purpose indicated. For example, a satellite telephone assigned to the Control Room should not be credited for performing both Offsite Response organization (ORO) and NRC notifications.

4.1.1 Notifications to, and communications with, OROs [per 10 CFR 50 Appendix E.IV.D and E.9.a]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Control Room	1 per Control Room for Shift Communicator	State Hot Ring Down Phone	Assumed Not Available	EMnet, Commercial telephone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Technical Support Center ² (TSC)	1 for Key TSC Communicator	State Hot Ring Down Phone	Assumed Not Available	EMnet, Commercial telephone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Emergency Operations Facility (EOF)	1 for Key EOF Communicator	State Hot Ring Down Phone	Assumed Not Available	EMnet, Commercial telephone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)
2. If applicable per site Emergency Plan

4.1.2 Notifications to, and communications with, the Nuclear Regulatory Commission (NRC) Headquarters Incident Response Center and the appropriate NRC Regional Office Operations Center [per 10 CFR 50 Appendix E.IV.D and E.9.d]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Control Room	1 per Control Room for ENS Communicator	ENS Phone	Assumed Not Available	Commercial telephone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Technical Support Center (TSC)	1 for ENS Communicator	ENS Phone	Assumed Not Available	Commercial telephone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Location(s) where HPN communications are performed	1 for HPN Communicator	NRC Health Physics Network	Assumed Not Available	Commercial telephone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.3 Communications between licensee emergency response facilities [per 10 CFR 50 Appendix E.9.c. Additional links that support performance of critical response functions are also specified.]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Control Room	1 per unit	AARD Telephones	Assumed Not Available	Commercial telephone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

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Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Technical Support Center (TSC)	1 each for: <ul style="list-style-type: none"> • Senior/Lead TSC Manager • Operations Coordination • Maintenance Coordination • Engineering Coordination • Radiological Support Additional response coordination links for multi-unit sites: <ul style="list-style-type: none"> • 1 for each position providing Unit Response Coordination. 	AARD Telephones	Assumed Not Available	Commercial telephone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Operational Support Center (OSC)	1 each for: <ul style="list-style-type: none"> • Senior/Lead OSC Manager • Radiological Support Additional	AARD Telephones DARD Telephones	Assumed Not Available	Commercial telephone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
	response coordination links for multi-unit sites: <ul style="list-style-type: none"> • 1 for each position providing Unit In-Plant Team Coordination. 						
Emergency Operations Facility (EOF)	1 each for: <ul style="list-style-type: none"> • Senior/Lead Manager • Key Protective Measures • Operations or Technical Support (as needed to support performance of dose projections, formulation of PARs and plant status updates to ORO) 	AARD Telephones DARD Telephones	Assumed Not Available	Commercial telephone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
	authorities).						
Emergency News Center (ENC)	1 for Senior Manager	NONE specified in E-Plans	Assumed Not Available	NONE specified in E-Plans	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.4 Communications with field/offsite monitoring teams [per 10 CFR 50 Appendix E.9.c]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Primary location where field/offsite monitoring team coordination is performed	Field/offsite monitoring team coordination	450 MHz Radio	Assumed Not Available	Commercial Telephones, Cellular Telephones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Primary location from which field/ offsite monitoring	1 for each field/offsite monitoring team	450 MHz Radio	Assumed Not Available	Commercial Telephones, Cellular Telephones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
teams are deployed							

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.5 Communications with other Federal agencies as described in the site emergency plan (e.g., the US Coast Guard) [per 10 CFR 50 Appendix E.9.b]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Primary location where communication with Federal agencies is performed	Coordination with Federal agencies	Commercial phone system	Assumed Not Available	Cellular Telephones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.6 Coordination and direction of on-site and in-plant response teams.

4.1.6.1 Phase 1 Assessment

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
On-shift staff	Number necessary for the on-shift staff to perform Initial Phase coping actions	PAX phone system	Assumed Not Available	Handheld Radios	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Operational Support Center (OSC) and other site-specific locations as necessary	1 each for: <ul style="list-style-type: none"> • On-site radiological monitoring 2 each for: <ul style="list-style-type: none"> • Firefighting (1 for brigade leader & 1 for the brigade) 2 each per unit for: <ul style="list-style-type: none"> • In-plant radiological monitoring • Search and Rescue • Emergency repairs Site-specific number needed	PAX phone system Portable UHF Radio	Assumed Not Available	Handheld Radios	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
	to implement any 2 severe accident mitigation strategies						

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.2 Plant Paging

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
N/A	See assumptions and discussion in NEI12-01	PAX System	Assumed Not Available	Two way radios	Yes	No	N/A

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.3 Communications Equipment at ORO Facilities

Emergency Response Facility	Minimum Communication Links	Primary Method	Primary Method Available Assumed LSEE?	Backup Method(s)	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Citrus County WP/EOC	1 for key WP Communicator 1 for key EOC Communicator	State Hot Ring Down line	Assumed Not Available	EMnet, Commercial Telephones	Assumed Not Available	Portable Satellite Phone	N/A
Levy County WP/EOC	1 for key WP Communicator 1 for key EOC Communicator	State Hot Ring Down line	Assumed Not Available	EMnet, Commercial Telephones	Assumed Not Available	Portable Satellite Phone	N/A
State EOC (SWOT)	1 for key WP Communicator 1 for key EOC Communicator	State Hot Ring Down line	Assumed Not Available	EMnet, Commercial Telephones	Assumed Not Available	Portable Satellite Phone	N/A

Considerations for performing the communications assessment and identifying enhancements:

4.4 NOTIFICATION OF THE EMERGENCY RESPONSE ORGANIZATION (ERO)

Florida Power Corporation (FPC) has implemented a new ERO self-activation process as follows:

During an electrical grid disturbance (i.e., large scale natural disaster, regional blackout, technological disaster, etc.) communications capabilities (i.e., pagers, cell phones, internet, landline telephone systems, etc.) may be lost or severely degraded. ERO members, regardless of on-call status, are expected to monitor local radio, and emergency alert system (EAS) communications for impact to the grid structure.

Should the situation appear to be a major disturbance to the power grid, then:

- Ensure your home and family are safe, and
- If you are fit for duty and able to leave your family unattended, then
- Report to your designated emergency response facility (ERF).

4.5 EQUIPMENT LOCATION REQUIREMENTS

FPC conservatively assumed that primary communication systems and equipment for onsite and offsite communications capabilities during a beyond design basis extended loss of AC power event would not be relied upon. Given that assumption, alternate communications systems and equipment must be stored in a location, and maintained in a manner, that maximizes survivability following a beyond design basis external event. For example, equipment locations requirements should satisfy the guidance in NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Section 4.5. Moreover, FPC should ensure adequate power supplies for the alternate communications systems and equipment.

The adequacy of equipment storage and locations is ongoing, and is yet to be finalized. Therefore, FPC identified a recommendation/enhancements in this area. Refer to Attachment 1, Recommendation R-3.

4.6 PERFORMANCE CHARACTERISTICS

NEI 12-01 (section 2.4.7) states: "Offsite infrastructure supporting communications systems is inoperable in the area surrounding the site (e.g., cellular telephone or microwave towers, telephone central office buildings, telephone lines, etc.). For this assessment, the company has elected to "apply a default distance value, in all directions, of approximately 25 miles from the plant site." Based on these assumptions, satellite-based communications systems can be utilized to provide offsite communications.

FPC has purchased additional hand-held satellite phones and they have been delivered to the site and dedicated for usage by the Emergency Response Organization at their associated Emergency Response Facilities. These satellite phones are being incorporated into site programs and procedures. This minimizes any reliance on “multi-use” equipment. Refer to Attachment 1, Recommendation R-4.

4.7 OTHER ASSESSMENT CONSIDERATIONS

Pursuant to the information previously provided in *Carolina Power & Light Company and Florida Power Corporation's 90-day Response to the March 12, 2012, Request for Information Regarding Enclosure 5, recommendation 9.3 Emergency Preparedness*, dated June 11, 2012, via Reference 3.

FPC has purchased small portable generators for each site that can be used to power handheld radio chargers and portable satellite phone chargers. In addition, FPC has purchased additional satellite phones that utilize a battery power source to increase the overall diversity of the communication system power supplies. FPC will ensure an appropriate inventory of portable hand-held satellite phones and radios, spare batteries, and chargers, is available for use by the Emergency Response Organization. Refer to Attachment 1, Recommendations R-1 and R-2.

4.8 QUALITY AND MAINTENANCE-RELATED REQUIREMENTS

Crystal River's E-Plan and its E-Plan Implementing Procedures provide programmatic controls for communications equipment, and related power sources and infrastructure. Similar programmatic controls should be applied to other communications-related equipment to ensure availability and reliability, including the performance of periodic inventory checks and operability testing. Refer to Attachment 1, Recommendation R-4.

4.9 NATIONAL COMMUNICATIONS SYSTEM (NCS) SERVICES

FPC will ensure that a Government Emergency Telecommunications Service (GETS) account is established and that the account is verified annually. Refer to Attachment 1, Recommendation R-5.

4.10 COMMUNICATIONS PROVIDER EMERGENCY SERVICES

FPC is in the process of evaluating the emergency services offered by communication service providers. FPC will ensure that arrangements are in place with communications service providers to utilize their emergency services as described in NEI 12-01, Section 4.10. Refer to Attachment 1, Recommendation R-6.

4.11 PERSONNEL TRAINING

Appropriate training will be developed for and provided to response personnel on the location and use of communications systems and equipment. Refer to Attachment 1, Recommendation R-4.

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Attachment 4

Emergency Communications Assessment Rollup for

**Shearon Harris Nuclear Power Plant, Unit No. 1
Docket No. 50-400 / Renewed License No. NPF-63**

Consistent with emergency planning standard requirements, communications systems and equipment associated with the following emergency response functions should be available during an extended loss of AC power. Availability should be determined after a review of existing capabilities consistent with the assumptions of NEI 12-01, Revision 0, Section 2. In particular, it is important that the primary and backup (if applicable) power source for each communications system or piece of equipment be identified. Endpoint equipment identified for a communications link listed below should be used solely for the purpose indicated. For example, a satellite telephone assigned to the Control Room should not be credited for performing both Offsite Response organization (ORO) and NRC notifications.

4.1.1 Notifications to, and communications with, OROs [per 10 CFR 50 Appendix E.IV.D and E.9.a]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Control Room	1 per Control Room for Shift Communicator	Selective Signaling System	Assumed Not Available	HNP PBX phones, HEEC phones, Satellite phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Technical Support Center ² (TSC)	1 for Key TSC Communicator	N/A	N/A	N/A	N/A	N/A	N/A
Emergency Operations Facility (EOF)	1 for Key EOF Communicator	Selective Signaling System	Assumed Not Available	HNP PBX phones, HEEC phones, Satellite Phone	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)
2. If applicable per site Emergency Plan

4.1.2 Notifications to, and communications with, the Nuclear Regulatory Commission (NRC) Headquarters Incident Response Center and the appropriate NRC Regional Office Operations Center [per 10 CFR 50 Appendix E.IV.D and E.9.d]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Control Room	1 per Control Room for ENS Communicator	ENS	Assumed Not Available	HNP PBX phones, HEEC PBX phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Technical Support Center (TSC)	1 for ENS Communicator	ENS	Assumed Not Available	HNP PBX phones, HEEC phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Location(s) where HPN communications are performed	1 for HPN Communicator	HPN	Assumed Not Available	HNP PBX Phones, HEEC phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.3 Communications between licensee emergency response facilities [per 10 CFR 50 Appendix E.9.c. Additional links that support performance of critical response functions are also specified.]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Control Room	1 per unit	PBX telephone	Assumed Not Available	HEEC phones, Sound Powered Phones to OSC and TSC only	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

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Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Technical Support Center (TSC)	1 each for: <ul style="list-style-type: none"> • Senior/Lead TSC Manager • Operations Coordination • Maintenance Coordination • Engineering Coordination • Radiological Support Additional response coordination links for multi-unit sites: <ul style="list-style-type: none"> • 1 for each position providing Unit Response Coordination. 	PBX telephone	Assumed Not Available	HEEC phones, Satellite phones, Radios, Sound Powered Phones to MCR and OSC only	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Operational Support Center (OSC)	1 each for: <ul style="list-style-type: none"> • Senior/Lead OSC Manager • Radiological Support Additional	PBX telephone	Assumed Not Available	HEEC phones, Satellite phones, Radios, Sound Powered Phones to MCR and TSC only	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
	response coordination links for multi-unit sites: <ul style="list-style-type: none"> • 1 for each position providing Unit In-Plant Team Coordination. 						
Emergency Operations Facility (EOF)	1 each for: <ul style="list-style-type: none"> • Senior/Lead Manager • Key Protective Measures • Operations or Technical Support (as needed to support performance of dose projections, formulation of PARs and plant status updates to ORO) 	PBX telephone	Assumed Not Available	HNP PBX phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
	authorities).						
Joint Information Center (JIC)	1 for Senior Manager	Commercial Phone	Assumed Not Available	N/A	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.4 Communications with field/offsite monitoring teams [per 10 CFR 50 Appendix E.9.c]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Primary location where field/offsite monitoring team coordination is performed	Field/offsite monitoring team coordination	Radio	Yes	N/A	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Primary location from which field/ offsite monitoring teams are	1 for each field/ offsite monitoring team	Radio	Yes	N/A	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

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Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
deployed							

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.5 Communications with other Federal agencies as described in the site emergency plan (e.g., the US Coast Guard) [per 10 CFR 50 Appendix E.9.b]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Primary location where communication with Federal agencies is performed	Coordination with Federal agencies	PBX telephone	Assumed Not Available	HEEC PBX phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.6 Coordination and direction of on-site and in-plant response teams.

4.1.6.1 Phase 1 Assessment

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
On-shift staff	Number necessary for the on-shift staff to perform Initial Phase coping actions	PBX telephone	Assumed Not Available	Radios	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Operational Support Center (OSC) and other site-specific locations as necessary	1 each for: <ul style="list-style-type: none"> • On-site radiological monitoring 2 each for: <ul style="list-style-type: none"> • Firefighting (1 for brigade leader & 1 for the brigade) 2 each per unit for: <ul style="list-style-type: none"> • In-plant radiological monitoring • Search and Rescue • Emergency repairs Site-specific number needed	PBX telephone	Assumed Not Available	Radios	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
	to implement any 2 severe accident mitigation strategies						

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.2 Plant Paging

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
N/A	See assumptions and discussion in NE112-01	PA System	Assumed Not Available	Sound Powered Phones, Two way radios	Yes	No	N/A

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.3 Communications Equipment at ORO Facilities

Emergency Response Facility	Minimum Communication Links	Primary Method	Primary Method Available Assumed LSEE?	Backup Method(s)	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Chatham County	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial Telephone Lines	Assumed Not Available	Portable Satellite Phone	N/A
Chatham County Backup	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial Telephone Lines	Assumed Not Available	Portable Satellite Phone	N/A
Harnett County	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial Telephone Lines	Assumed Not Available	Portable Satellite Phone	N/A
Lee County	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial Telephone Lines	Assumed Not Available	Portable Satellite Phone	N/A
State EOC	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial Telephone Lines	Assumed Not Available	Portable Satellite Phone	N/A
Wake County Alt EOC	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial Telephone Lines	Assumed Not Available	Portable Satellite Phone	N/A
Wake County EOC	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial Telephone Lines	Assumed Not Available	Portable Satellite Phone	N/A

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Emergency Response Facility	Minimum Communication Links	Primary Method	Primary Method Available Assumed LSEE?	Backup Method(s)	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Wake County Warning Point	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial Telephone Lines	Assumed Not Available	Portable Satellite Phone	N/A

Considerations for performing the communications assessment and identifying enhancements:

4.4 NOTIFICATION OF THE EMERGENCY RESPONSE ORGANIZATION (ERO)

Carolina Power and Light Company (CP&L) has implemented a new ERO self-activation process as follows:

During an electrical grid disturbance (i.e., large scale natural disaster, regional blackout, technological disaster, etc.) communications capabilities (i.e., pagers, cell phones, internet, landline telephone systems, etc.) may be lost or severely degraded. ERO members, regardless of on-call status, are expected to monitor local radio, and Emergency Alert System (EAS) communications for impact to the grid structure.

Should the situation appear to be a major disturbance to the power grid, then:

- Ensure your home and family are safe, and
- If you are fit for duty and able to leave your family unattended, then
- Report to your designated Emergency Response Facility (ERF).

4.5 EQUIPMENT LOCATION REQUIREMENTS

CP&L conservatively assumed that primary communication systems and equipment for onsite and offsite communications capabilities during a beyond design basis extended loss of AC power event would not be relied upon. Given that assumption, alternate communications systems and equipment must be stored in a location, and maintained in a manner, that maximizes survivability following a beyond design basis external event. For example, equipment locations requirements should satisfy the guidance in NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Section 4.5. Moreover, CP&L should ensure adequate power supplies for the alternate communications systems and equipment.

The adequacy of equipment storage and locations is ongoing, and is yet to be finalized. Therefore, CP&L identified a recommendation/enhancements associated with equipment location requirements. Refer to Attachment 1, Recommendation 3.

4.6 PERFORMANCE CHARACTERISTICS

NEI 12-01 (Section 2.4.7) states: "Offsite infrastructure supporting communications systems is inoperable in the area surrounding the site (e.g., cellular telephone or microwave towers, telephone central office buildings, telephone lines, etc.). For this assessment, the company has elected to "apply a default distance value, in all directions, of approximately 25 miles from the plant site." Based on these assumptions, satellite-based communications systems can be utilized to provide offsite communications.

CP&L has purchased additional hand-held satellite phones and they have been delivered to the site and dedicated for usage by the Emergency Response Organization at their associated Emergency Response Facilities. These satellite phones are being incorporated into site programs and procedures. This minimizes any reliance on “multi-use” equipment. Refer to Attachment 1, Recommendation R-4.

4.7 OTHER ASSESSMENT CONSIDERATIONS

Pursuant to the information previously provided in *Carolina Power & Light Company and Florida Power Corporation's 90-day Response to the March 12, 2012, Request for Information Regarding Enclosure 5, Recommendation 9.3 Emergency Preparedness*, dated June 11, 2012, via Reference 3.

CP&L has purchased small portable generators for each site that can be used to power handheld radio chargers and portable satellite phone chargers. In addition, CP&L has purchased additional satellite phones that utilize a battery power source to increase the overall diversity of the communication system power supplies. CP&L will ensure an appropriate inventory of portable hand-held satellite phones and radios, spare batteries, and chargers, is available for use by the Emergency Response Organization. Refer to Attachment 1, Recommendations R-1 and R-2.

4.8 QUALITY AND MAINTENANCE-RELATED REQUIREMENTS

Harris's E-Plan and its E-Plan Implementing Procedures provide programmatic controls for communications equipment, and related power sources and infrastructure. Similar programmatic controls should be applied to other communications-related equipment to ensure availability and reliability, including the performance of periodic inventory checks and operability testing. Refer to Attachment 1, Recommendation R-4

4.9 NATIONAL COMMUNICATIONS SYSTEM (NCS) SERVICES

Harris will ensure that a Government Emergency Telecommunications Service (GETS) account is established and that the account is verified annually. Refer to Attachment 1, Recommendation R-5.

4.10 COMMUNICATIONS PROVIDER EMERGENCY SERVICES

CP&L is in the process of evaluating the emergency services offered by communication service providers. CP&L will ensure that arrangements are in place with communications service providers to utilize their emergency services as described in NEI 12-01, Section 4.10. Refer to Attachment 1, Recommendation R-6.

4.11 PERSONNEL TRAINING

Appropriate training will be developed for and provided to response personnel on the location and use of communications systems and equipment. Refer to Attachment 1, Recommendation R-4.

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Attachment 5

Emergency Communications Assessment Rollup for

**H. B. Robinson Steam Electric Plant, Unit No. 2
Docket No. 50-261 / Renewed License No. DPR-23**

Consistent with emergency planning standard requirements, communications systems and equipment associated with the following emergency response functions should be available during an extended loss of AC power. Availability should be determined after a review of existing capabilities consistent with the assumptions of NEI 12-01, Revision 0, Section 2. In particular, it is important that the primary and backup (if applicable) power source for each communications system or piece of equipment be identified. Endpoint equipment identified for a communications link listed below should be used solely for the purpose indicated. For example, a satellite telephone assigned to the Control Room should not be credited for performing both Offsite Response organization (ORO) and NRC notifications.

4.1.1 Notifications to, and communications with, OROs [per 10 CFR 50 Appendix E.IV.D and E.9.a]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Control Room	1 per Control Room for Shift Communicator	Selective Signaling System	Assumed Not Available	PBX phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Technical Support Center ² (TSC)	1 for Key TSC Communicator	N/A	N/A	N/A	N/A	N/A	N/A
Emergency Operations Facility (EOF)	1 for Key EOF Communicator	Selective Signaling System	Assumed Not Available	PBX phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)
2. If applicable per site Emergency Plan

4.1.2 Notifications to, and communications with, the Nuclear Regulatory Commission (NRC) Headquarters Incident Response Center and the appropriate NRC Regional Office Operations Center [per 10 CFR 50 Appendix E.IV.D and E.9.d]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Control Room	1 per Control Room for ENS Communicator	NRC Emergency Telecommunication System (ETS)	Assumed Not Available	PBX phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Technical Support Center (TSC)	1 for ENS Communicator	NRC Emergency Telecommunication System (ETS)	Assumed Not Available	PBX phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Location(s) where HPN communications are performed	1 for HPN Communicator	NRC Health Physics Network	Assumed Not Available	PBX phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.3 Communications between licensee emergency response facilities [per 10 CFR 50 Appendix E.9.c. Additional links that support performance of critical response functions are also specified.]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Control Room	1 per unit	PBX Telephone	Assumed Not Available	PA system, ESSX phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

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Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Technical Support Center (TSC)	1 each for: <ul style="list-style-type: none"> • Senior/Lead TSC Manager • Operations Coordination • Maintenance Coordination • Engineering Coordination • Radiological Support Additional response coordination links for multi-unit sites: <ul style="list-style-type: none"> • 1 for each position providing Unit Response Coordination. 	PBX Telephone	Assumed Not Available	PA system, ESSX phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Operational Support Center (OSC)	1 each for: <ul style="list-style-type: none"> • Senior/Lead OSC Manager • Radiological Support Additional	PBX Telephone	Assumed Not Available	PA system, ESSX phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
	response coordination links for multi-unit sites: <ul style="list-style-type: none"> • 1 for each position providing Unit In-Plant Team Coordination 						
Emergency Operations Facility (EOF)	1 each for: <ul style="list-style-type: none"> • Senior/Lead Manager • Key Protective Measures • Operations or Technical Support (as needed to support performance of dose projections, formulation of PARs and plant status updates to ORO) 	PBX Telephone	Assumed Not Available	PA system, ESSX phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
	authorities).						
Joint Information Center (JIC)	1 for Senior Manager	PBX Telephone	Assumed Not Available	Cellular Phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

- The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.4 Communications with field/offsite monitoring teams [per 10 CFR 50 Appendix E.9.c]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Primary location where field/offsite monitoring team coordination is performed	Field/offsite monitoring team coordination	Radio	Yes	Cellular Phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Primary location from which field/ offsite monitoring teams are	1 for each field/ offsite monitoring team	Radio	Yes	Cellular Phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
deployed							

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.5 Communications with other Federal agencies as described in the site emergency plan (e.g., the US Coast Guard) [per 10 CFR 50 Appendix E.9.b]

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Primary location where communication with Federal agencies is performed	Coordination with Federal agencies	PBX Telephone	Assumed Not Available	Cellular phones	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.1.6 Coordination and direction of on-site and in-plant response teams.

4.1.6.1 Phase 1 Assessment

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan ¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan ¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
On-shift staff	Number necessary for the on-shift staff to perform Initial Phase coping actions	PBX Telephone	Assumed Not Available	PA system, Radios	Assumed Not Available	Portable Satellite Phone	4.5, 4.7
Operational Support Center (OSC) and other site-specific locations as necessary	1 each for: <ul style="list-style-type: none"> • On-site radiological monitoring 2 each for: <ul style="list-style-type: none"> • Firefighting (1 for brigade leader & 1 for the brigade) 2 each per unit for: <ul style="list-style-type: none"> • In-plant radiological monitoring • Search and Rescue • Emergency repairs Site-specific number needed	PBX Telephone	Assumed Not Available	PA system, Minicell (PBX)	Assumed Not Available	Portable Satellite Phone	4.5, 4.7

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
	to implement any 2 severe accident mitigation strategies						

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.2 Plant Paging

Emergency Response Facility	Minimum Communication Links	Primary Method Described in E-Plan¹	Primary Method Available Assumed LSEE?	Backup Method(s) Described in E-Plan¹	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
N/A	See assumptions and discussion in NE112-01	PA System	Assumed Not Available	Bullhorns Two way radios	Yes	No	N/A

NOTES:

1. The phrase "Described in the E-Plan" refers to the Emergency Plan and/or Emergency Plan Implementing Procedures (EPIPs)

4.3 Communications Equipment at ORO Facilities

Emergency Response Facility	Minimum Communication Links	Primary Method	Primary Method Available Assumed LSEE?	Backup Method(s)	Backup Method(s) Available following Assumed LSEE?	Planned or Potential Improvement Identified?	Refer to the Following Sections for Additional Information
Chesterfield County EOC/WP	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial telephone lines	Assumed Not Available	Portable Satellite Phone	N/A
Darlington County EOC/WP	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial telephone lines	Assumed Not Available	Portable Satellite Phone	N/A
JIC	1 for key WP Communicator 1 for key EOC Communicator	PBX Telephone	Assumed Not Available	Cellular Phones	Assumed Not Available	Portable Satellite Phone	N/A
Lee County EOC/WP	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial telephone lines	Assumed Not Available	Portable Satellite Phone	N/A
Remote Facility	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial telephone lines	Assumed Not Available	Portable Satellite Phone	N/A
State EOC	1 for key WP Communicator 1 for key EOC Communicator	Selective Signaling System	Assumed Not Available	Commercial telephone lines	Assumed Not Available	Portable Satellite Phone	N/A

Considerations for performing the communications assessment and identifying enhancements:

4.4 NOTIFICATION OF THE EMERGENCY RESPONSE ORGANIZATION (ERO)

Carolina Power and Light Company (CP&L) have implemented a new ERO self-activation process as follows:

During an electrical grid disturbance (i.e., large scale natural disaster, regional blackout, technological disaster, etc.) communications capabilities (i.e., pagers, cell phones, internet, landline telephone systems, etc.) may be lost or severely degraded. ERO members, regardless of on-call status, are expected to monitor local radio, and emergency alert system (EAS) communications for impact to the grid structure.

Should the situation appear to be a major disturbance to the power grid, then:

- Ensure your home and family are safe, and;
- If you are fit for duty and able to leave your family unattended, then
- Report to your designated emergency response facility (ERF).

4.5 EQUIPMENT LOCATION REQUIREMENTS

CP&L conservatively assumed that primary communication systems and equipment for onsite and offsite communications capabilities during a beyond design basis extended loss of AC power event would not be relied upon. Given that assumption, alternate communications systems and equipment must be stored in a location, and maintained in a manner, that maximizes survivability following a beyond design basis external event. For example, equipment locations requirements should satisfy the guidance in NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Section 4.5. Moreover, CP&L should ensure adequate power supplies for the alternate communications systems and equipment.

The adequacy of equipment storage and locations is ongoing, and is yet to be finalized. Therefore, CP&L identified a recommendation/enhancement in this area. Refer to Attachment I, Recommendation R-3.

4.6 PERFORMANCE CHARACTERISTICS

NEI 12-01 (section 2.4.7) states: "Offsite infrastructure supporting communications systems is inoperable in the area surrounding the site (e.g., cellular telephone or microwave towers, telephone central office buildings, telephone lines, etc.). For this assessment, the company has elected to "apply a default distance value, in all directions, of approximately 25 miles from the plant site." Based on these assumptions, satellite-based communications systems can be utilized to provide offsite communications.

CP&L has purchased additional hand-held satellite phones and they have been delivered to the site and dedicated for usage by the Emergency Response Organization at their associated Emergency Response Facilities. These satellite phones are being incorporated into site programs and procedures. This minimizes any reliance on “multi-use” equipment. Refer to Attachment 1, Recommendation R-4.

4.7 OTHER ASSESSMENT CONSIDERATIONS

Pursuant to the information previously provided in *Carolina Power & Light Company and Florida Power Corporation’s 90-day Response to the March 12, 2012, Request for Information Regarding Enclosure 5, Recommendation 9.3 Emergency Preparedness*, dated June 11, 2012, via Reference 3:

CP&L has purchased small portable generators for each site that can be used to power handheld radio chargers and portable satellite phone chargers. In addition, CP&L has purchased additional satellite phones that utilize a battery power source to increase the overall diversity of the communication system power supplies. CP&L will ensure an appropriate inventory of portable hand-held satellite phones and radios, spare batteries, and chargers, is available for use by the Emergency Response Organization. Refer to Attachment 1, Recommendations R-1 and R-2.

4.8 QUALITY AND MAINTENANCE-RELATED REQUIREMENTS

Robinson’s E-Plan and its E-Plan Implementing Procedures provide programmatic controls for communications equipment, and related power sources and infrastructure. Similar programmatic controls should be applied to other communications-related equipment to ensure availability and reliability, including the performance of periodic inventory checks and operability testing. Refer to Attachment 1, Recommendation R-4.

4.9 NATIONAL COMMUNICATIONS SYSTEM (NCS) SERVICES

CP&L will ensure that a Government Emergency Telecommunications Service (GETS) account is established and that the account is verified annually. Refer to Attachment 1, Recommendation R-5.

4.10 COMMUNICATIONS PROVIDER EMERGENCY SERVICES

CP&L are in the process of evaluating the emergency services offered by communication service providers. CP&L will ensure that arrangements are in place with communications service providers to utilize their emergency services as described in NEI 12-01, Section 4.10. Refer to Attachment 1, Recommendation R-6.

4.11 PERSONNEL TRAINING

Appropriate training will be developed for and provided to response personnel on the location and use of communications systems and equipment. Refer to Attachment 1, Recommendation R-3.