



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION II  
245 PEACHTREE CENTER AVENUE NE, SUITE 1200  
ATLANTA, GEORGIA 30303-1257

September 23, 2011

EA-11-208

Mr. Jon A. Franke  
Vice President, Crystal River Nuclear Plant  
Crystal River Nuclear Plant (NA1B)  
15760 W. Power Line Street  
Crystal River, FL 34428-6708

**SUBJECT: CRYSTAL RIVER UNIT 3 - NRC EMERGENCY PREPAREDNESS  
INSPECTION REPORT 05000302/2011501; PRELIMINARY WHITE FINDING**

Dear Mr. Franke:

On August 4, 2011, the U.S. Nuclear Regulatory Commission (NRC) completed an Emergency Preparedness inspection at your Crystal River Unit 3. The inspection included on-site inspection on June 27, 2011, through July 1, 2011, and periodic in-office inspection through August 4, 2011. The enclosed inspection report documents the inspection results, which were discussed on August 4, 2011, and September 14, 2011, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

This report documents a licensee-identified finding that has preliminarily been determined to be White, a finding with low to moderate safety significance. As described in Section 1EP4 of this report, a finding was identified for failure to comply with 10 CFR 50.54(q). Specifically on June 27, 2011, you identified that Crystal River Unit 3's emergency plan emergency action level (EAL) 1.4 (General Emergency – Gaseous Effluents) contained instrument classification threshold values that were beyond the specified effluent radiation monitors' capabilities to accurately indicate. The inability to classify a general emergency using these instruments is an apparent violation of the requirements in 10 CFR 50.54(q) associated with planning standard 10 CFR 50.47(b)(4). This finding was assessed based on the best information available, using the Emergency Preparedness Significance Determination Process (SDP).

In accordance with NRC Inspection Manual Chapter 0609, we intend to complete our evaluation using the best available information and issue our final determination of safety significance within 90 days of the date of this letter. The Significance Determination Process encourages an open dialogue between NRC and licensee staff, however, the dialogue should not impact the timeliness of the NRC's final determination. Before we make a final decision on this matter, we are providing you an opportunity to: (1) present your perspectives on the facts and assumptions used by the NRC to arrive at the findings and their significance at a regulatory conference; or (2) submit your position on the findings to the NRC in writing. If you request a regulatory conference, it should be held within approximately 30 days of the receipt of this letter, and we

encourage you to submit supporting documentation at least one week prior to the conference in an effort to make the conference more efficient and effective. If a regulatory conference is held, it will be open for public observation. The NRC will also issue a press release to announce the conference. If you decide to submit only a written response, such submittal should be sent to the NRC within 30 days of the receipt of this letter. If you decline to request a regulatory conference or submit a written response, you relinquish your right to appeal the final Significance Determination Process conclusion, in that by not doing either, you fail to meet the appeal requirements stated in the Prerequisite and Limitation sections of Attachment 2 of Inspection Manual Chapter 0609.

Please contact Mr. Brian Bonser at (404) 997-4653 within 10 days of the date of this letter to notify the NRC of your intentions. If we have not heard from you within 10 days, we will continue with our significance determination and enforcement decision and you will be advised by separate correspondence of the results of our deliberations on this matter.

Since the NRC has not made a final determination in this matter, no notice of violation is being issued for this inspection finding at this time. In addition, please be advised that the number and characterization of the apparent violation described in the enclosed inspection report may change as a result of further NRC review.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if any, will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

**/ RA / H. Christensen for J. Munday**

Joel Munday, Director  
Division of Reactor Safety

Docket No.: 50-302  
License No.: DPR-72

Enclosure:  
Inspection Report 05000302/2011501  
w/Attachment: Supplemental Information

cc w/encl.: (See page 3)

encourage you to submit supporting documentation at least one week prior to the conference in an effort to make the conference more efficient and effective. If a regulatory conference is held, it will be open for public observation. The NRC will also issue a press release to announce the conference. If you decide to submit only a written response, such submittal should be sent to the NRC within 30 days of the receipt of this letter. If you decline to request a regulatory conference or submit a written response, you relinquish your right to appeal the final Significance Determination Process conclusion, in that by not doing either, you fail to meet the appeal requirements stated in the Prerequisite and Limitation sections of Attachment 2 of Inspection Manual Chapter 0609.

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Sincerely,

**/RA/ H. Christensen for J. Munday**

Joel Munday, Director  
Division of Reactor Safety

Docket No.: 50-302  
License No.: DPR-72

Enclosure:  
Inspection Report 05000302/2011501  
w/Attachment: Supplemental Information

cc w/encl.: (See page 3)

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RIDSNRRDIRS  
PUBLIC  
RidsNrrPMCrystal River Resource

**\*See previous concurrence page**

X PUBLICLY AVAILABLE       NON-PUBLICLY AVAILABLE       SENSITIVE      X NON-SENSITIVE  
ADAMS: X Yes      ACCESSION NUMBER: **ML112660544**      X SUNSI REVIEW COMPLETE      X FORM 665 ATTACHED

OFFICE	RII: DRS/PSB1	RII: DRS/PSB1	RII: DRP/BR3	RII: EICS	RII: DRS		
SIGNATURE	RA	RA	RA	RA	RA/HC For JM		
NAME	M. SPECK	B. BONSER	D. RICH	S. SPARKS	J. MUNDAY		
DATE	09/20/2011	09/20/2011	09/20/2011	09/22/2011	09/23/2011		
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

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**U. S. NUCLEAR REGULATORY COMMISSION**

**REGION II**

Docket Nos.: 05000302

License Nos.: DPR-72

Report No.: 05000302/2011501

Licensee: Progress Energy (Florida Power Corporation)

Facility: Crystal River Unit 3

Location: Crystal River, FL

Dates: June 27, 2011, through August 4, 2011

Inspectors: M. Speck, Sr. Emergency Preparedness Inspector

Approved by: B. Bonser, Chief  
Plant Support Branch 1  
Division of Reactor Safety

Enclosure

## SUMMARY OF FINDINGS

IR 05000302/2011501; 06/27/2011 – 08/04/2011; Crystal River Unit 3; Baseline Inspection.

The report covered an announced inspection by a regional emergency preparedness inspector and additional in-office inspection. One Apparent Violation (AV) item with potential White safety significance was identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process."

A. NRC-Identified and Self-Revealing Findings

None

B. Licensee-Identified Violations

Cornerstone: Emergency Preparedness

- TBD. An AV was identified for failure to follow and maintain in effect emergency plans which use a standard emergency classification and action level scheme. Specifically, the licensee's emergency plan emergency action level (EAL) 1.4, General Emergency - Gaseous Effluent, specified instrument values that were beyond the limits of the effluent radiation monitors capabilities to accurately measure.

This finding was considered more than minor because the licensee is required to be capable of implementing adequate measures to protect public health and safety in the event of a radiological emergency. Regulations require a standard emergency classification and action level scheme, the bases which include facility system and effluent parameters, in use by the licensee and State and local response plans call for reliance on information provided by the licensee for determination of minimum initial offsite response measures. As a result of having General Emergency EAL threshold values that were beyond the range of the associated effluent radiation monitors, Crystal River Unit 3 personnel may not have been able to perform timely and accurate classification of an emergency based upon an effluent radioactive material release. Emergency response actions directed by the State and local emergency response plans, which rely on information provided by the licensee, could have potentially been delayed.

The cause of the finding is related to the human performance cross-cutting element of Decision-making (H.1(a)) for ensuring that risk-significant decisions are made using a systematic process and obtaining interdisciplinary input and reviews. (Section 1EP4)

## REPORT DETAILS

### 1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

#### 1EP2 Alert and Notification System Testing

##### a. Inspection Scope

The inspector evaluated the adequacy of licensee's methods for testing the Alert and Notification System (ANS) in accordance with Nuclear Regulatory Commission (NRC) Inspection Procedure 71114, Attachment 02, "Alert and Notification System Evaluation". The applicable planning standard, 10 CFR Part 50.47(b)(5), and its related requirements, 10 CFR Part 50, Appendix E, Section IV.D, were used as reference criteria. The criteria contained in NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1, was also used as a reference.

The inspector reviewed various documents that are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the ANS on a biennial basis.

##### b. Findings

No findings were identified.

#### 1EP3 Emergency Preparedness Organization Staffing and Augmentation System

##### a. Inspection Scope

The inspector reviewed the licensee's Emergency Response Organization (ERO) augmentation staffing requirements and process for notifying the ERO to ensure the readiness of key staff for responding to an event and timely facility activation. The qualification records of key position ERO personnel were reviewed to ensure all ERO qualifications were current. A sample of problems identified from augmentation drills or system tests performed since the last inspection were reviewed to assess the effectiveness of corrective actions.

The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 03, "Emergency Response Organization Staffing and Augmentation System." The applicable planning standard, 10 CFR 50.47(b)(2), and its related requirements, 10 CFR 50, Appendix E, were used as reference criteria.

The inspector reviewed various documents that are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the ERO staffing and augmentation system on a biennial basis.

b. Findings

No findings were identified.

1EP4 Emergency Action Level and Emergency Plan Changes

a. Inspection Scope

Since the last NRC inspection of this program area, revision 30 of the Emergency Plan was implemented. The licensee determined that in accordance with 10 CFR 50.54(q), the changes resulted in no decrease in the effectiveness of the Plan, and that the revised Plan continued to meet the requirements of 10 CFR 50.47(b), and Appendix E to 10 CFR Part 50. The inspector conducted a review of the Emergency Action Level changes and a sampling of the implementing procedure changes made between October 1, 2010, and June 30, 2011, to evaluate for potential decreases in effectiveness of the Plan. However, this review was not documented in a Safety Evaluation Report and does not constitute formal NRC approval of the changes. Therefore, these changes remain subject to future NRC inspection in their entirety.

The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 04, "Emergency Action Level and Emergency Plan Changes." The applicable planning standard, 10 CFR 50.47(b)(4), and its related requirements, 10 CFR 50, Appendix E, were used as reference criteria.

The inspector reviewed various documents that are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the emergency action level and emergency plan changes on an annual basis.

b. Findings

Introduction: An apparent violation (AV) of 10 CFR 50.54(q) and 10 CFR 50.47(b)(4) was identified for the failure to follow and maintain in effect emergency plans which use a standard emergency classification and action level scheme. Specifically, the licensee's emergency plan General Emergency action level (EAL) 1.4 –Gaseous Effluent - specified mid-range effluent radiation monitor threshold values that were beyond the instruments' indicated ranges. This finding has been preliminarily evaluated as having low to moderate (White) safety significance.

Description: On June 27, 2011, Crystal River 3 determined that General Emergency EAL 1.4, Gaseous Effluent incorporated classification threshold values of 1700 mrem/hr as read on the mid-range RM-A1 (Auxiliary building), or RM-A2 (Reactor building) radiation monitors, which were greater than the maximum available indication of the instrument (1000 mrem/hr). Licensee immediate actions were to document the issue in their CAP, change the EAL threshold to the previously used value of 1000 mrem/hr, and inform Operations staff and emergency response organization members of the issue and threshold value changes.

Further research by the licensee, using a cross-discipline analysis, determined that the instrument was unusable for accurate effluent monitoring and dose assessment for values greater than approximately 2/3 of full-scale (i.e. 600-700 mrem/hr). This

condition appears to have been in existence to some extent since the EAL threshold was established in 1999. There have been at least two revisions to the threshold values, including one as recent as June 2010, which provided the licensee opportunities to identify the discrepant thresholds. The last revision established some of the threshold values above the radiation monitors' maximum indicated value. The licensee has since changed the EAL criteria to a different effluent radiation monitor.

These discrepant threshold values degraded the licensee's ability to make timely and accurate General Emergency classifications based on gaseous effluent parameters, in that decision-makers would have to rely on other means to classify the event (dose assessments or field monitoring data). The monitors' inaccuracy would also inhibit the licensee's ability to determine the magnitude and to continually assess the impact of the release of radioactive materials.

The cause of the finding is related to the human performance cross-cutting element of Decision-making (H.1(a)) for ensuring that risk-significant decisions are made using a systematic process and obtaining interdisciplinary input and reviews.

Analysis: The inspector concluded that the failure to maintain in effect emergency plans which meet the regulations and standards, and have a standardized EAL scheme in use based on facility system and effluent parameters for several years prior to June 2011, was a performance deficiency. The performance deficiency was determined to be more than minor because it was associated with the Emergency Preparedness Cornerstone attribute of Emergency Response Organization Performance. It impacted the cornerstone objective because it was associated with a program element not meeting 50.47(b) planning standards to protect the health and safety of the public in the event of a radiological emergency. Specifically, the licensee's ability to declare a General Emergency based on effluent radiation monitor values was degraded. The finding was assessed for significance in accordance with NRC Manual Chapter 0609, using the Phase I SDP worksheets for emergency preparedness. It was determined that Manual Chapter 0609, Appendix B, Emergency Preparedness Significance Determination Process should be used to provide a deterministic SDP result.

This finding was evaluated in accordance with Manual Chapter 0609, Appendix B, and is preliminarily determined to be a finding of low to moderate safety significance (White) because there was a degraded risk-significant planning standard function.

Manual Chapter 0609, Appendix B states, "FAILURE TO COMPLY means that a program is noncompliant with a REGULATORY REQUIREMENT." The inspector determined the licensee was noncompliant with 10 CFR 50.54(q), 50.47(b)(4), and App. E, section IV.B in that the Abnormal Rad Level/Radiological Effluent Emergency Action Level contained General Emergency classification threshold values for the Auxiliary Building and Reactor Building effluent radiation monitors, which were greater than what the monitor could accurately read. This would require use of other means to determine whether a General Emergency threshold had been exceeded (dose assessment or actual field readings) which could delay the declaration. It also appears that the inability to use the specified mid-range effluent radiation monitors conflicts with the requirements in Appendix E, which include EALs to be based on "in-plant conditions and instrumentation in addition to onsite and offsite monitoring." Since the licensee retained the ability to perform procedurally-driven dose assessments and field surveys, the

inspector determined that the inability of the licensee to have all specified means of evaluating whether a General Emergency EAL threshold was exceeded constituted a degraded rather than a failed risk-significant planning standard (RSPS). Using Sheet 1, "Emergency Preparedness Significance Determination Process – Failure To Comply" flow chart, a White significance resulted from a degraded, risk-significant planning standard.

Enforcement: 10 CFR Part 50.54(q), requires that a holder of a nuclear power reactor operating license under this part, shall follow and maintain in effect emergency plans which meet the standards in 10 CFR 50.47(b), and the requirements in appendix E of this part.

10 CFR 50.47(b)(4), requires a standard emergency classification and action level scheme, the bases of which include facility and system effluent parameters is in use by the nuclear facility licensee, and State and local response calls for reliance on information by facility licensees for determinations of minimum initial offsite response measures.

10 CFR Part 50, Appendix E, Section IV.B., Assessment Actions, requires that means to be used for determining the magnitude of, and for continuously assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies. The emergency action levels shall be based on in-plant conditions and instrumentation in addition to onsite and offsite monitoring.

Contrary to the above, for several years prior to June 2011, the licensee failed to maintain in effect, a standard emergency classification scheme which included facility effluent parameters. Specifically, the General Emergency classification 1.4 specified effluent radiation monitors' (RM-A1 and RM-A2) values greater than that which the instruments could accurately measure. Those monitors were being relied upon to determine the magnitude and for continuously assessing the impact of the release of radioactive materials, as well as providing criteria for determining the need for notification and participation of local and State agencies. Pending final determination of safety significance, this finding was identified as an apparent violation (AV) 05000302/2011501-01, Failure to Maintain a Standard Emergency Action Level Scheme.

#### 1EP5 Correction of Emergency Preparedness Weaknesses and Deficiencies

##### a. Inspection Scope

The inspector reviewed the corrective actions identified through the Emergency Preparedness program to determine the significance of the issues and to determine if repeat problems were occurring. The facility's self-assessments and audits were reviewed to assess the licensee's ability to be self-critical, thus avoiding complacency and degradation of their emergency preparedness program. In addition, the inspector reviewed licensee self-assessments and audits to assess the completeness and effectiveness of all emergency preparedness related corrective actions.

The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 05, "Correction of Emergency Preparedness Weaknesses". The applicable planning standard, 10 CFR 50.47(b)(14) and its related 10 CFR 50, Appendix E requirements were used as reference criteria.

The inspector reviewed various documents which are listed in the Attachment. This inspection activity satisfied one inspection sample for the correction of emergency preparedness weaknesses on a biennial basis.

b. Findings

No findings were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification

a. Inspection Scope

The inspector sampled licensee submittals relative to the Performance Indicators (PIs) listed below for the period July 1, 2010, through March 31, 2011. To verify the accuracy of the PI data reported during that period, PI definitions and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, was used to confirm the reporting basis for each data element.

Emergency Preparedness Cornerstone

- Emergency Response Organization Drill/Exercise Performance (DEP)
- Emergency Response Organization Readiness (ERO)
- Alert and Notification System Reliability (ANS)

The inspection was conducted in accordance with NRC IP 71151, "Performance Indicator Verification." For the specified review period, the inspector examined data reported to the NRC, procedural guidance for reporting PI information, and records used by the licensee to identify potential PI occurrences. The inspector verified the accuracy of the PI for ERO drill and exercise performance through review of a sample of drill and event records. The inspector reviewed selected training records to verify the accuracy of the PI for ERO drill participation for personnel assigned to key positions in the ERO. The inspector verified the accuracy of the PI for alert and notification system reliability through review of a sample of the licensee's records of periodic system tests. The inspector also interviewed the licensee personnel who were responsible for collecting and evaluating the PI data. Licensee procedures, records, and other documents reviewed within this inspection area are listed in the Attachment to this report.

This inspection activity satisfied one inspection sample each for the Drill/Exercise Performance, ERO Drill Participation, and Alert and Notification System as defined in IP 71151-05.

b. Findings

No findings were identified.

4OA6 Meetings, including Exit

On July 1, 2011, the inspector presented the preliminary inspection results to Mr. J. Franke and other members of licensee management who acknowledged the issue presented. Following completion of additional reviews in the Region II office, another exit meeting was held by teleconference on August 4, 2011, with Mr. B. Wunderly and again on September 14, 2011, with Mr. J. Franke and other members of licensee management. The inspector confirmed that proprietary information was not provided or examined during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION

## **SUPPLEMENTAL INFORMATION**

### **KEY POINTS OF CONTACT**

#### Licensee personnel

S. Cahill, Manager, Engineering  
P. Dixon, Manager, Training  
J. Franke, Vice President, Crystal River Nuclear Plant  
D. Herrin, Lead Licensing Engineer  
J. Huegel, Manager, Nuclear Oversight  
C. Poliseno, Supervisor, Emergency Preparedness  
M. Rigsby, Manager, Site Support Services  
J. Stephenson, Manager, Fleet Emergency Preparedness  
B. Wunderly, Manager, Operations

### **ITEMS OPENED, CLOSED, AND DISCUSSED**

#### Opened

05000302/2011501-01      AV      Failure to Maintain a Standard EAL Scheme

#### Closed and Discussed

None

### **LIST OF DOCUMENTS REVIEWED**

#### Section 1EP2: Alert and Notification System Testing

##### Procedures and Manual

Citrus County Radiological Emergency Response Procedure REP SOP-11, Operation of the  
Emergency Sirens, Rev. June 2011  
Whelen Siren Control System Operating Guide, February 8, 2007  
Emergency Preparedness Staff Guidance (EPSG)-020, Alert and Notification System, Rev. 2

##### Records and Data

Crystal River Unit 3 Siren log 6/14/10-6/24/11  
Documentation of weekly silent and full-volume ANS tests  
Selected ANS repair and annual preventive maintenance records, 2010-2011

### Section 1EP3: Emergency Response Organization (ERO) Augmentation

#### Procedures

EM-206, Emergency Plan Roster Notification, Rev. 107  
 TPP-219, Emergency Response Organization Training Program, Rev. 5  
 AI-4000, Conduct of Emergency Preparedness and Schedule for Radiological Emergency Response Plan Maintenance, Rev. 12  
 AI-400H, Severe Accident Management Program and Guidelines, Rev.0  
 AI-4001, Conduct of Drills and Exercises Supporting the Radiological Emergency Response Plan, Rev. 3

#### Records and Data

Radiological Emergency Response Plan 8/14/2010 Unannounced Staffing Drill Report  
 Radiological Emergency Response Plan 5/3/2011 Training Drill Report  
 Radiological Emergency Response Plan 3/1/2011 Training Drill Report  
 Dose Assessment Team Tabletop 3/23/2011 Training Drill Report  
 Radiologic Emergency Response Plan Exercise Critique 10/6/2010  
 Emergency Preparedness Staff Augmentation Training drill report January 12, 2011  
 2010/2011 ERO Pager tests  
 2010, and 2011, Augmentation Drill packages  
 Review of ERO position qualifications for selected individuals  
 Emergency Preparedness logbooks for 2010, 2011

### Section 1EP4: Emergency Action Level (EAL) and Emergency Plan Changes

#### Procedures

REG-NGGC-0010, 10 CFR 50.59 and Selected Regulatory Reviews, Rev. 15  
 Personnel Qualification Data – CR3 50.59 Qualified Evaluator listing

#### Change Packages for Plans and Procedures

Radiological Emergency Plan, Rev. 29 and 30  
 EAL Bases Manual, Rev. 9 and 10  
 EM-225, Duties of the Technical Support Center, Rev. 23  
 EM-913A, Large Area Fire Resulting in Loss of Control Room Command and Control Functions, Rev. 2  
 EM-102, Operation of the Technical Support Center, Rev. 51  
 EM-104, Operation of the Operational Support Center, Rev. 13  
 EM-402, Emergency Operations Facility Technical Support Team, Rev. 4  
 AI-4000, Conduct of Emergency Preparedness and Schedule for Radiological Emergency Response Plan Maintenance, Rev. 12  
 EM-400, Operation of the EOF, Rev. 12  
 EM-206, Emergency Response Organization Notification, Rev 107  
 EM-202, Duties of the Emergency Coordinator, Rev. 89, 90, 91, 92, and 93

## Section 1EP5: Correction of Emergency Preparedness Weaknesses and Deficiencies

### Procedures

CAP-NGGC-0201, Self-Assessment/Benchmark Programs, Rev. 16

### Audits and Self-Assessments

C-EP-11-01, Emergency Preparedness Assessment, February 22, 2011

C-EP-FR-10-01, Emergency Preparedness Program Mid-Cycle Review, February 8, 2010

431502, Quick Hit Self-Assessment Report, 08/30-09/17/2010

442313, Quick Hit Self-Assessment Report, 01/10-14/2011

457573, Quick Hit Self-Assessment Report, 04/13-20/2011

470156, Quick Hit Self-Assessment Report, 06/23/2011

470159, Quick Hit Self-Assessment Report, 06/13-20/2011

470161, Quick Hit Self-Assessment Report, 06/09-12/2011

470167, Quick Hit Self-Assessment Report, 06/23/2011

434294, Bench Mark Report, Drill and Exercise Critiques, 10/1/2010, and 11/17/2010

### NCR Action Request Documents

384495, Inaccurate Notification

428726, Inaccurate Notification

441995, Ineffective Corrective Actions in Drill/Exercise Performance

447238, PA not functioning

449241, Comm equipment replaced without prior warning

451364, Inaccurate info provided to dose assessment team

454187, RM-A2G(H) cannot receive high alarm

456477, Tornado Watch notification not timely

456658, Plant configuration may affect RM-A2 accuracy

463117, PA speaker has low volume

470640, Annual EPIP review late

472419, EM-202 mode definition misleading

444203, PA announcements not heard

438833, EM-220 does not support FSAR statement

439708, ERO on-call telephone list discrepancies

## Section 4OA1: Performance Indicator (PI) Verification

### Procedures

REG-NGGC-0009, NRC Performance Indicators and Monthly Operating Report Data, Rev. 10

### Records and Data

DEP opportunities documentation from 3<sup>rd</sup> Quarter 2010, through 1<sup>st</sup> Quarter 2011

Drill and exercise participation records of ERO personnel from 3<sup>rd</sup> Quarter 2010, through 1<sup>st</sup> Quarter 2011

Siren test data from 2<sup>nd</sup> Quarter 2010, through 1<sup>st</sup> Quarter 2011

Various ERO Personnel Qualification and Participation records

Corrective Actions Resulting From Inspection

474103: Revise REG-NGGC-0010  
474428: E-Plan definition incomplete  
474475: Rollup of NRC comments

**LIST OF ACRONYMS**

ANS	Alert and Notification System
AV	Apparent Violation
CAP	Corrective Action Program
DEP	Drill/Exercise Performance
EAL	Emergency Action Level
ERO	Emergency Response Organization
IMC	Inspection Manual Chapter
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
PI	Performance Indicator
PS	Planning Standard
RSPS	Risk Significant Planning Standard
SDP	Significance Determination Process