

## EPFAQ 2013-008 Draft Response

### Question:

A confusion over the On-shift Staffing Analysis concerning evaluation of the Fuel Handling Accident has produced inconsistent OSAs. If the FSAR DBA chapter includes a Fuel Handling Accident it cannot be analyzed using only the Emergency Plan minimum on-shift staffing. Fuel movements involve quite a number of additional personnel for the evolution.

### Proposed Solution:

Provide clear guidance for the Fuel Handling Accident that the event does not meet the criteria for a formal staffing analysis.

### NRC Response:

Although the guidance in NSIR/DPR-ISG-01 does not suggest that licensees consider in their on-shift staffing analysis (OSA) only those design basis accidents while a reactor is at power, these types of accidents would be the limiting events for on-shift staffing. Furthermore, during outages where fuel handling is occurring, additional staff would be available onsite if a fuel handling accident were to occur. Therefore, nuclear power plant licensees need not consider a fuel handling event in their on-shift staffing analysis.

For nuclear power plant licensees of sites with no operating reactors that are undergoing decommissioning or are independent spent fuel storage installation (ISFSI) only facilities, the number of staff is generally small, but is commensurate with the need to operate the facility in a manner that is protective of public health and safety. The NRC staff does not believe an on-shift staffing analysis is necessary for these sites, subject to licensees of these sites receiving an exemption from the requirements of 10 CFR Part 50, Appendix E, Section IV.A.9.