



Pre-Submittal Call

**License Amendment Request for
Change in DAEC Emergency Plan Staff
Augmentation Response Times**

June 30, 2016

Participants

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Agenda

- **Pre-Submittal Call Purpose and LAR Schedule**
- **Emergency Plan Licensing Basis**
- **Summary of Changes to the Emergency Plan**
- **Precedent**
- **Regulatory Requirements and Guidance**
- **Conclusions**
- **Summary**

Pre-Submittal Call Purpose

- **Outline proposed Emergency Plan changes that increase staff augmentation times from 30 minutes and 60 minutes to 60 to 90 minutes**
 - **Ensure LAR addresses:**
 - Regulatory Requirements
 - Regulatory Guidance
- **LAR Schedule**
 - Submittal no later than the end of Sept. 2016
 - Request approval by end of 2017
 - Propose a 180 day implementation period

Emergency Plan (E-Plan) Licensing Basis

- The NRC SER approved E-Plan was Revision 2, dated December 27, 1982.
- The current Emergency Plan Section B is Revision 37.
- The current revision of the E-Plan includes staffing analysis that ensures compliance with the Enhanced Emergency Preparedness Rule Making issued in November 2011.

Notable E-Plan Changes Since Last NRC Approval

- ERO in Rev. 2 of the E-Plan consisted of 46 positions
- Current ERO consists of 60 positions

Summary of Changes to the Emergency Plan (E-Plan)

- **Section B**, “Emergency Response Organization” proposed changes:
 - Revise response times from 30 and 60 minutes to 60 and 90 minutes.
 - Table B-1 changes reflect updated response times for responders.
 - Table B-1 changes reflect updated positions within the Emergency Response Facilities.
- **Section E**, “Notification Methods and Procedures,” Section 2.2(2)(b) revision reflects augmentation time changes for the TSC and the OSC from 30 and 60 minute positions to 60 and 90 minute positions.

Summary of Changes to the Emergency Plan (E-Plan)

- **Section H, “Emergency Facilities Staffing, Activation and Equipment”**
 - Sections 2.1 and 2.2, changes describe the activation of the TSC and OSC at an ALERT or higher emergency classification. This change also includes the augmentation time changes for the TSC/OSC from 30 and 60 minutes to 60 and 90 minutes.
 - Sections 2.3 changes describe the activation of the EOF at an ALERT or higher emergency classification. This change also includes the augmentation time change for the EOF from 60 minutes to 90 minutes.

Precedent

- **Changes to E-Plan are similar to other Licensees**
 - Susquehanna
 - Fermi
 - River Bend
 - Watts Bar
- **DAEC Submittal Package:**
 - Based on the Augmentation LAR Package submitted by Point Beach
 - Includes functional analysis for NUREG-0654 Table B-1 Major Tasks and follows the Point Beach Submittal Supplement

Regulatory Requirements and Guidance

- **Regulatory Requirements**

- 10 CFR 50.54 (q), 10 CFR 50, Appendix E, and 10 CFR 50.47 (b)

- **Regulatory Guidance**

- RG 1.219, “Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors”
- NSIR/DPR-ISG-01, “Interim Staff Guidance, Emergency Planning for Nuclear Power Plants”
- DRAFT RIS 2016-XX, “License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation”
- NEI 10-05, “Assessment of On-shift Emergency Response Organization Staffing and Capabilities”
- NUREG-0654/FEMA-REP-1, Rev. 1, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants”
- NEI 06-02, “License Amendment Request (LAR) Guidelines”

Conclusions

- **Based upon technical and functional analysis the proposed changes will:**
 - Continue to support the functional areas of the Emergency Plan.
 - Continue to ensure the protection of the health and safety of the public and site personnel.
 - Not present a significant burden to the on-shift personnel.
- **Based upon regulatory evaluation, the proposed E-Plan changes do not involve a significant hazards consideration as defined in 10 CFR 50.92(c), in that they do not:**
 - Involve a significant increase in the probability or consequences of an accident previously evaluated.
 - Create the possibility of a new or different kind of accident from any accident previously evaluated.
 - Involve a significant reduction in a margin of safety.

Summary

The ERO staffing augmentation response time is being increased, resulting in an increased ERF activation time, but the emergency response functions identified in the E-Plan will continue to be performed by the on-shift staff until relieved by augmented ERO responders and will not result in a reduction of the capability of the ERO to effectively respond to the emergency.