



Pre-Submittal Call

**License Amendment Request for
Change in DAEC Emergency Plan
Emergency Planning Zone Boundary**

July 13, 2016

Participants

- **Mark Fritz, DAEC Emergency Preparedness Manager**
- **Mike Davis, DAEC Licensing Manager**
- **Peter Polfleit, Fleet Emergency Preparedness Manager**
- **Rebecca Palmer, DAEC Emergency Preparedness**
- **Jim Probst, DAEC Licensing**

Agenda

- **Pre-Submittal Call Purpose**
- **Schedule**
- **Why Modify the EPZ Boundary?**
- **Emergency Plan Licensing Basis**
- **Proposed Emergency Plan Changes**
- **Regulatory Requirements and Guidance**
- **Precedent**
- **Conclusions**

Pre-Submittal Call Purpose

- **Outline proposed DAEC Emergency Plan changes that would modify the DAEC Emergency Planning Zone (EPZ) boundaries and the 2013 Evacuation Time Estimate (ETE) Study**
 - **Ensure LAR addresses:**
 - Regulatory Requirements
 - Regulatory Guidance

LAR Schedule

- Submittal no later than the end of October 2016
- Request approval by October 2017
- 90 day implementation period. Implementation January 2018 – this coincides with required annual publication of public information materials utilizing updated EPZ Boundary Map

Why Modify the EPZ Boundary?

The proposed modification to the EPZ Boundary will:

- Reflect the desire of Linn County to modify subarea 24 in the EPZ *(current & proposed EPZ Maps provided in final slides)*.
- Remove the area south of U.S. Highway 30 in subarea 24. This area is 12 to 15 miles from the plant, and entirely outside the 10-mile radius of the plant.
- Align the EPZ southern boundary with US Highway 30 and make a continuous boundary along the entire EPZ southern boundary. U.S. Highway 30 is a four-lane divided highway with controlled access *(photo provided in final slides)*.
- Aid in traffic control, messaging, and planning.

Emergency Plan (E-Plan) Licensing Basis

- The last NRC SER approved E-Plan was Revision 2, dated December 27, 1982, showing a 10-mile EPZ.
- In 1993 FEMA approved the current EPZ Boundary, which exceeds the 10-mile EPZ. The current EPZ Boundary, for subarea 24, follows the City of Cedar Rapids corporate boundaries as they existed in 1993.

Proposed Changes to the Emergency Plan (E-Plan) and Related Implementing Procedures

- **E-Plan Section I**, “Accident Assessment” proposed change to the EPZ Boundary Map, Figure I-1 (EPZ Boundary Map will be updated).
- **E-Plan Appendix 3**, “DAEC Evacuation Time Estimate Study,” Dec. 2013.
 - Preliminary ETE Study was completed and submitted with Linn County EMA’s June 2016 FEMA EPZ Boundary Modification request. Note that Iowa Homeland Security and Emergency Management provided support for the proposal to FEMA.
 - A full ETE Study will be completed in 2016 prior to LAR submission to the NRC.
- **EPIP 3.3**, “Dose Assessment and Protective Actions” Attachment 1 (Evacuation Time Estimates will be updated)

Precedent

- **Changes to E-Plan are similar to other Licensees**
 - Brunswick
 - Beaver Valley
 - Comanche Peak

Submittal Package

- **DAEC Submittal package:**
 - Will include pertinent sections of Linn County Emergency Management Agency's Request to FEMA to modify subarea 24 southern boundary and cover letters of review and agreement by the State of Iowa Homeland Security and Emergency Management Division.
 - Based on the LAR submitted by Beaver Valley, Brunswick, and Comanche Peak.
 - Complete update of the 2013 Evacuation Time Estimate Study.

Regulatory Requirements and Guidance

- **Regulatory Requirements**

- 10 CFR 50.54 (q), 10 CFR 50, Appendix E, and 10 CFR 50.47 (b)
- NUREG-0654/FEMA-REP-1
- NUREG-0396

- **Regulatory Guidance**

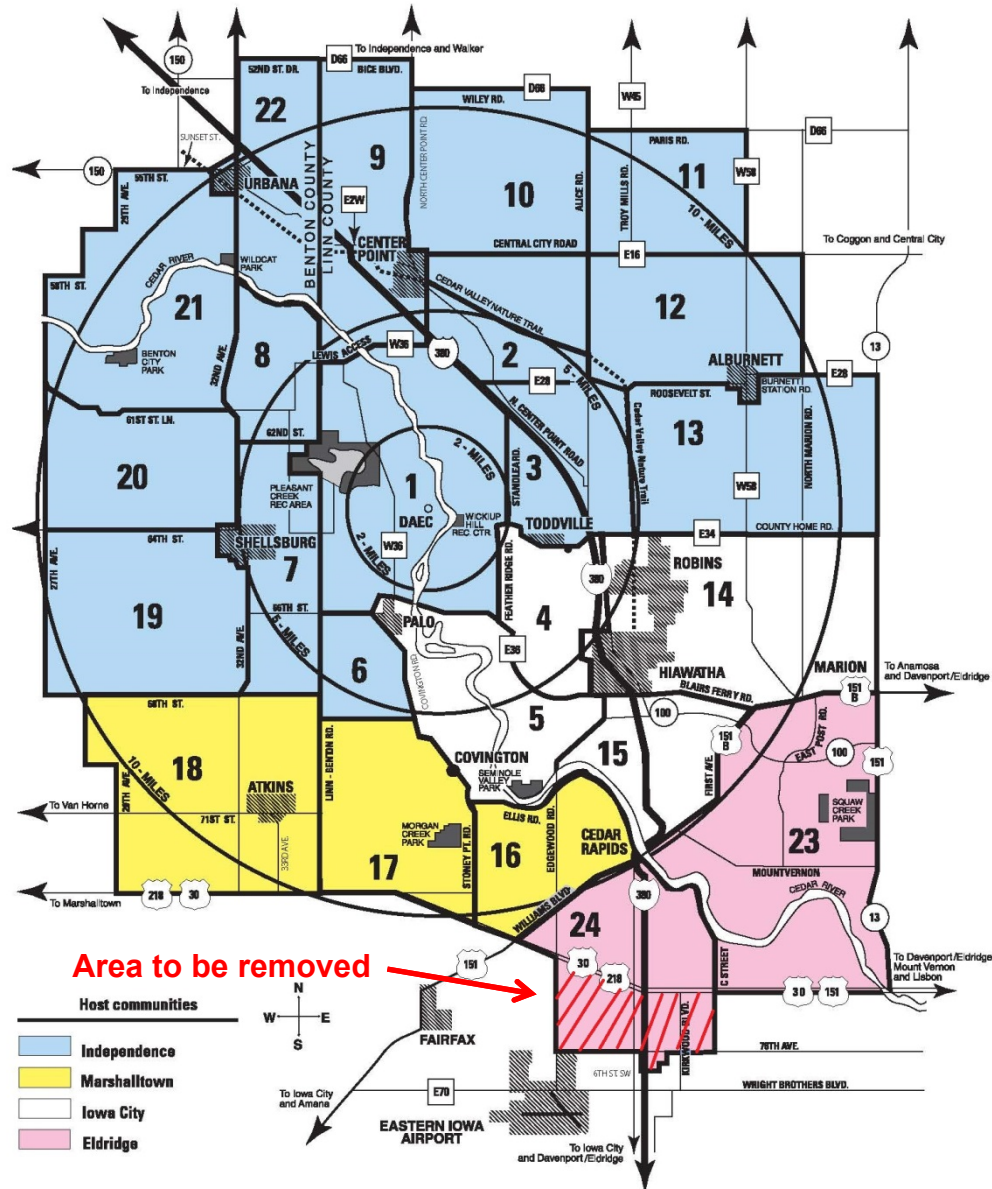
- RG 1.219, “Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors”
- RIS 2005-02, “Clarifying The Process For Making Emergency Plan Changes”
- NSIR/DPR-ISG-01, “Interim Staff Guidance, Emergency Planning for Nuclear Power Plants”
- FEMA P-1028, “Program Manual: Radiological Emergency Preparedness,” January 28, 2016

Conclusions

- **Current technical and functional analysis indicate 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.
- **Current evaluation indicates 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.

Emergency Action Plan

Emergency Planning Zone (EPZ) Map



U.S. Highway 30 New Southern Boundary for Subarea 24

