

Post Shutdown Emergency Plan and Emergency Action Level License Amendment Requests

NEI EP Decommissioning Workshop
October 19 – 20, 2016

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Session Goal: Attendees will gain a better understanding of the following:

1. The scope of changes to the licensee's (onsite) emergency plan (SEP) and emergency action levels (EALs) to address the permanently shut down and defueled condition of facility
2. Details required in submittal to support NRC's evaluation of proposed reduction to on-shift and augmented emergency response organization (ERO) staffing
3. Expectation on evaluating potential impacts on offsite REP plans and State/local interface
4. Expectations for a pre-implementation drill demonstration
5. Lessons-Learned

Scope of Staffing Changes

- Staffing is reduced from normal operating conditions to levels that are commensurate with the need to safely store spent fuel at a facility
 - On-shift staffing
 - ERO (augmentation) staffing
- **Must meet EP regulatory requirements for operating plants**

Scope of EAL Changes

- Licensees will continue to use a standard EAL scheme
- Their current scheme should be modified to reflect the permanently defueled status
- Changes should be limited to those that reflect
 - Modes that are no longer applicable
 - Conditions that are no longer applicable
 - Equipment that is no longer required

Details Required to Support NRC's Evaluation of Proposed Reduction to ERO Staffing

- Provide sufficient information for the NRC reviewer to independently reach the conclusion made by the licensee.
 - If the licensee indicates that an evaluation was performed, then objective evidence should be provided that supports the licensee conclusion.
 - LARs tend to focus on EP functions as identified by site-specific staffing tables.
 - However, the NRC staff must also verify that spent fuel pool mitigation strategies can be promptly implemented as needed.

Details Required to Support NRC's Evaluation of Proposed Reduction to ERO Staffing

- For a proposal to remove the on-shift maintenance position(s):
 - The on-shift operator performs this function
 - The on-shift operator has the required training to perform all potential normal and off-normal procedural tasks related to maintaining or restoring the key safety functions

Details Required to Support NRC's Evaluation of Proposed Reduction to ERO Staffing

- For a proposal to remove the radwaste operator position
 - The on-shift operator performs this function
 - The radwaste operator is not required to perform any normal and off-normal procedural tasks related to maintaining or restoring the key safety functions
 - The radwaste operator is not assigned any other ERO responsibilities
 - If needed, a radwaste operator would be called in to process waste as needed

Recent LAR Input

- We will develop procedures
- We will develop training
- We have provided an ERO Task Analysis
- We have performed an on-shift staffing analysis

Staffing Analysis

- The post-shutdown OSA concluded that...
- The post-shutdown OSA indicates that...
- The post-shutdown OSA confirmed that...
- The post-shutdown OSA determined there...

Staffing Analysis

Line #	Function / Task	On-Shift Position	Task Analysis Controlling Method
1	Declare the emergency classification level	Shift Manager	Emergency Planning Training Program / EP Drills
2	Approve Offsite Protective Action Recommendations	N/A	N/A
3	Approve content of State/local notifications	Shift Manager	Emergency Planning Training Program / EP Drills
4	Approve extension to allowable dose	N/A	N/A
5	Notification and direction to on-shift staff (e.g., to assemble, evacuate)	Shift Manager	Licensed Operator Training Program / Emergency Planning Training Program
6	ERO notification	Shift Manager	Emergency Planning Training Program / EP Drills

Expectation for Evaluating Potential Impacts on Offsite REP Plans and State/local Interface

- The licensee should provide objective evidence that proposed changes will not impact the licensee's ability to interface with State and local officials.
- The licensee should provide documentation of discussions with State and local officials.
 - Not concurrence, unless proposed change impacts REP plan
- If REP plans may be impacted, FEMA review needed.

Expectations for a Pre-Implementation Drill Demonstration

- A regulatory commitment to perform an observed pre-implementation drill should be provided unless a drill was already performed.
- The NRC and FEMA should be provided with the opportunity to observe a pre-implementation drill.
- State, and local response organizations should be provided the opportunity to participate in a pre-implementation drill.

Lessons Learned

Licensees for decommissioning nuclear power reactors either:

1. Improperly used the 10 CFR 50.59 process to implement changes in their emergency plans under 10 CFR 50.54(q) (e.g., changes to ERO staffing)
2. Were considering removing plant equipment or instrumentation no longer required for plant operation under 10 CFR 50.59 but required to implement emergency plan/emergency action levels (EALs) under 10 CFR 50.47(b)

Lessons Learned

RG 1.219, “Guidance on Making Changes to
Emergency Plans for Nuclear Power Reactors.”
Revision 1 (ADAMS Accession No. ML16061A104)

- Addressed the use of the EP change process and related reduction in effectiveness considerations for decommissioning reactors.