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ONS-2017-011

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February 2, 2017

10 CFR 50.54(q)

Attn: Document Control Desk
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, Maryland 20852-2746

Subject: Duke Energy Carolinas, LLC
Oconee Nuclear Station, Units 1, 2, and 3
Docket Nos. 50-269, -270, and -287
Emergency Plan
Revised 10 CFR 50.54(q) Evaluation

Please find attached for your use and review a copy of the revised 10 CFR 50.54(q) evaluation associated with a previously submitted change to the Oconee Nuclear Station Emergency Plan. A revisions to the 10 CFR 50.54(q) evaluation was the result of the Duke Corrective Action Program. There is no new revision to the associated Emergency Plan.

The revised evaluation is being submitted in accordance with 10 CFR 50.54(q) and did not reduce the effectiveness of the ONS Emergency Plan. If there are any questions or concerns pertaining to this revision please call Pat Street, Emergency Preparedness Manager, at 864-873-3124.

By copy of this letter, two copies of the revision are being provided to the NRC, Region II, Atlanta, Georgia.

Sincerely,

Thomas D. Ray
Vice President
Oconee Nuclear Station

Attachments:
Revision Instructions
Emergency Plan Revised 10 CFR 50.54(q) Evaluation

AX45
NRR

ONS-2017-011

U. S. Nuclear Regulatory Commission
February 2, 2017

xc: w/2 copies of attachments

Ms. Catherine Haney
Administrator, Region II
Marquis One Tower
245 Peachtree Center., NE Suite 1200
Atlanta GA 30303-1257

w/copy of attachment

Mr. James R. Hall, Senior Project Manager
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
11555 Rockville Pike
Mailstop: O-8G9A
Rockville, MD 20852 2738
(send via E-mail)

w/o attachment

Mr. Eddy Crowe - NRC Senior Resident Inspector Oconee Nuclear Station
ELL - EC2ZF

January 3, 2017

OCONEE NUCLEAR STATION

SUBJECT: Emergency Plan 50.54Q Revision

Please note the following revised 50.54Q to the Emergency Plan that was previously submitted on April 28, 2016:

ONS EPlan Rev. 2015-007 Screen/Evaluation

Appendix 5
Section B
Section D
Section F
Section J
Section L
Section N

A handwritten signature in black ink, appearing to read 'Pat Street', with a long horizontal line extending to the right.

Pat Street
ONS Emergency Preparedness Manager

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Screening and Evaluation Number	Applicable Sites	
EREG #: <u>01979258 Revised 02085385</u> <i>Revisions in italicized print</i>	BNP	<input type="checkbox"/>
	CNS	<input type="checkbox"/>
	CR3	<input type="checkbox"/>
	HNP	<input type="checkbox"/>
5AD #: <u>01979258</u>	MNS	<input type="checkbox"/>
	ONS	X
	RNP	<input type="checkbox"/>
	GO	<input type="checkbox"/>
Document and Revision ONS Emergency Plan 2015-007	Oconee Nuclear Station Emergency Plan; Appendix 5, Section B, Section D, Section F, Section J, Section L, Section N	

Part I. Description of Proposed Change:

Appendix 5,

1. Letter #3, DELETED, now covered under State Agreement Letter #20
2. Letter #4, DELETED, now covered under State Agreement Letter #20
3. Letter #5, Changed from Oconee Memorial Hospital to Greenville Health System
4. Letter #6, DELETED, merged with GHS, Letter #5
5. Added location of electronic versions of LOA's to end of top paragraph,' and electronically filed in Fusion'
6. Added location of electronic versions of LOA's to end of bottom paragraph,' and electronically filed in Fusion'

Section B

7. p. B-4, Under AMBULANCE, replaced Oconee Medical Center with Greenville Health System
8. p. B-4, Under MEDICAL, replaced Blue Ridge Emergency Physicians with Greenville Health system and replaced Oconee Medical Center with Greenville Health System
9. p.B-4, Under HOSPITAL, replaced Oconee Medical Center with Greenville Health System

Section D

10. Enclosure 4.6, ppD-67-68; changed the wording in the BASIS: " Only those explosions of sufficient force to damage permanent structures or equipment within the plant and Keowee Hydro should be considered" to " Only those explosions of sufficient force to damage nearby permanent structures or equipment within the plant and Keowee Hydro should be considered." (CAPR 019010385)
11. Enclosure 4.6 p. D-67. Added; "An energized equipment (electrical component) failure that results in visible damage to other nearby permanent structures or equipment should be considered in this EAL. Surface blemishes (e.g., paint chipping, scratches), minor scorching, or minor deformation should not be considered visible damage. An energized equipment (electrical component) failure (caused by short circuits, grounding, arcing, etc.) should not automatically be considered an explosion. Such events may require a post-event inspection to determine if the attributes of an explosion are/were

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present. The electrical component (energized equipment) that failed must be evaluated for its impact on the plant. Other EAL's may apply for the component failure's impact on the plant. (CAPR 019010385)

12,13,14,15,16,17,18,19,20. Enclosure 4.7 pp. D-83, D-86, D-87, D-98 added IMMINENT FAILURE prior to 'Condition A' and POTENTIAL FAILURE prior to 'Condition B'. (CAPR 01910389)

Section F

22. p.F-5, F.2, replaced Oconee Medical Center with Oconee Memorial Hospital

Section L

24. p.L-1, Under paragraph L.1 replaced four instances of Oconee Medical Center with Oconee Memorial Hospital

25. p.L-1, Under Medical Support, replaced Blue Ridge Emergency Physicians with Greenville Health System.

26. p.L-2, L.4, Replaced two instances of Oconee Medical Center with Oconee Memorial Hospital

27. p.L-5, Figure L-3, Location; replaced Oconee Medical Center with Oconee Memorial Hospital

Section N

28. p.N-2,N.2.c, replaced Oconee Medical Center with Oconee Memorial Hospital

Attachment 6, 10 CFR 50.54(q) Initiating Condition (IC) and Emergency Action Level (EAL) and EAL Bases Validation and Verification (V&V) Form , is attached (required for IC or EAL change)

Yes ☒ X
No ☐

Part II. Description and Review of Licensing Basis Affected by the Proposed Change:

Oconee Nuclear Station Emergency Plan, Revision 82-2

A.ASSIGNMENT OF RESPONSIBILITY (Organizational Control)

A.1.a; *The Oconee Nuclear Station Emergency Plan is a coordinated effort involving: Station personnel, station emergency plans, station facilities and equipment, the emergency resources of Duke Power Company corporate organization, emergency services of various local, state, and federal agencies having appropriate jurisdiction or concern for public health and safety.*

A.3; *Appendix 5 is a display of agreement letters with the following organizations:*

B. ONSITE EMERGENCY ORGANIZATION

B.9; *Local Agency Support, Agreements with local agency support groups have been made to assist the Oconee Nuclear Station during emergency situations*

C. EMERGENCY RESPONSE SUPPORT AND RESOURCES

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and Local staff at Duke Power's Crisis Management Center have been made, and for other organizations capable of augmenting the planned response are now identified

D. EMERGENCY CLASSIFICATION SYSTEM

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by Oconee Nuclear station. These emergency classifications together with the emergency action levels will be used by the Duke Power Company to provide determinations of minimum initial

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offsite response measures.

L. MEDICAL AND PUBLIC HEALTH SUPPORT

L.1, Local and Backup Hospital and Medical Support

Hospital - (Agreements located in Appendix 5)

L.4 Transport of Accident Victims

Oconee Nuclear station has an agreement (located in Appendix 5) with the Oconee Emergency Medical Service (Ambulance) to provide transportation for any medical emergency patient (may or may not be contaminated). A medical decontamination kit is located in the unit #3 Health Physics Lab. (Figure K-4)

If the patient is contaminated only, the efforts to decontaminate will be done by Health Physics. A body burden analysis will be performed to determine radiation level. If the radiological accident is one of ingestion of radioactive air only, a body burden will be performed by Health Physics and then the patient will be transported to Oconee Memorial Hospital by station personnel, (if the situation warrants medical care). Health Physics will attend the patient.

Oconee Nuclear Station Emergency Plan, Revision 2015-006

A.ASSIGNMENT OF RESPONSIBILITY (Organizational Control)

A.1.a; The Oconee Nuclear Station Emergency Plan is a coordinated effort involving site personnel, site emergency plans, plant facilities and equipment, the emergency resources of Duke Energy Company corporate organization, emergency services of various local, state, and federal agencies having appropriate jurisdiction or concern for public health and safety.

A.3; Agreement Letters Appendix 5 is a display of agreement letters

Letters of agreement shall be updated as necessary and at least every three (3) years, or in accordance to conditions set by agreement agency to insure adequate awareness on the part of all concerned of the existence and commitment to provide agreed services or assistance.

B. ONSITE EMERGENCY ORGANIZATION

B.9; Local Agency Support, Agreements with local agency support groups have been made to assist the Oconee Nuclear Site during emergency situations

C. EMERGENCY RESPONSE SUPPORT AND RESOURCES

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and Local staff at Duke Energy's Emergency Operations Facility have been made, and for other organizations capable of augmenting the planned response are identified

D. EMERGENCY CLASSIFICATION SYSTEM

Reg Guide 1.101, Rev. 3, August, 1992, approved the guidance provided by NUMARC/NESP-007, Revision 2, as an Alternative Methodology for the Development of Emergency Action Levels. Oconee Nuclear Site used the NUMARC guidance for the development of initiating conditions and emergency action levels. The emergency action levels provided in this section have been modified to implement the guidance provided in NRC Bulletin 2005-02, NEI guidance as endorsed in Regulatory Issue Summary 2006-12 and to support the implementation of NEI 03-12.

L. MEDICAL AND PUBLIC HEALTH SUPPORT

L.1, The Oconee Medical Center serves as the primary means of care for any contaminated and injured person from the Oconee Nuclear Site. A decontamination room has been added to the hospital for treatment of any person involved in an emergency that would require decontamination and medical treatment.

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L.4 Transportation of Externally Contaminated Injured Person; The Oconee Nuclear Site has an agreement with the Oconee Medical Center Emergency Medical Service (Ambulance) to provide transportation for any medical emergency patient.

RIS 2005-02, Clarifying the Process for Making Emergency Plan Changes, Rev. 1 states,

2) Emergency plan

a) The document prepared and maintained by the licensee that identifies and describes the licensee's methods for maintaining emergency preparedness, and responding to emergencies. An emergency plan includes the plan as originally approved by the NRC, and all subsequent changes made by the licensee with, and without, prior NRC review and approval under 10 CFR 50.54(q).

i) The licensee's emergency plan consists of:

(1) The emergency plan as approved by the NRC via a Safety Evaluation Report (SE), or license amendment (LA) from the Office of Nuclear Reactor Regulation (NRR) or the Office of Federal and State Materials and Environmental Management Programs (FSME).

(2) Any subsequent changes to the emergency plan explicitly reviewed by the NRC through an SE, or LA from NRR or FSME, and found to meet the applicable regulations.

(3) Any subsequent changes made by the licensee without NRC review and approval after the licensee concluded that the change(s) do not constitute a decrease in effectiveness under 10 CFR 50.54(q).

The differences in ONS Emergency Plan, Revision 82-2, and the current revision of the ONS Emergency Plan have been determined to meet the regulatory requirements of the course of revisions. Each revision has been evaluated in the regulatory process has met the approval of the NRC during the inspection process.

The changes described in this evaluation do not reduce the effectiveness of the emergency plan.

Part III. Description of How the Proposed Change Complies with Regulation and Commitments.

If the emergency plan, modified as proposed, no longer complies with planning standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50, then ensure the change is rejected, modified, or processed as an exemption request under 10 CFR 50.12, Specific Exemptions, rather than under 10 CFR 50.54(q):

10CFR50.47(b)(1) Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

Emergency responsibilities of supporting organizations continue to be assigned.

10CFR50.47(b)(2) On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.

Interfaces among offsite response activities are specified.

10CFR50.47(b)(3) Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's Emergency Operations Facility have been

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made, and other organizations capable of augmenting the planned response have been identified.

Arrangements for requesting and effectively using assistance resources continue to be in place.

10CFR50.47(b)(4) A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

A standard emergency classification and action level scheme continues to be in place.

10CFR50.47(b)(12) Arrangements are made for medical services for contaminated injured individuals.

Arrangements continue to be in place for medical services for contaminated injured individuals.

10CFR50, Appendix E.IV.A.6 A description of the local offsite services to be provided in support of the licensee's emergency organization.

10CFR50, Appendix E.IV.E; Emergency Facilities and Equipment - Adequate provisions shall be made and described for emergency facilities and equipment, including: (5) Arrangements for medical service providers qualified to handle radiological emergencies onsite; (6) Arrangements for transportation of contaminated injured individuals from the site to specifically identified treatment facilities outside the site boundary; (7). Arrangements for treatment of individuals injured in support of licensed activities on the site at treatment facilities outside the site boundary

Changes 1,2,3,4,7,8,9,22,24,25,26,27 and 28 have no impact on the Emergency Plan. Changes were the result of the state of South Carolina taking responsibility for coordinating the SC Highway Patrol and SC Law enforcement Division and the Greenville Health System taking over the responsibilities of Oconee Medical Center and Blue ridge Physicians. no Reduction in Effectiveness.

Changes 5 and 6 are an enhancement, storing the LOA's electronically and referencing where these records can be retrieved. no Reduction in Effectiveness.

Changes 10 and 11 are an enhancement to the definition of explosion in response to site lessons learned to limit the delay in classification of events, no Reduction in Effectiveness.

Changes 12,13,14,15,16,17,18,19 and 20 are an enhancement to the definition of Condition A and Condition B in response to an impending change in FERC standards in relation to Hydro EAPs. The change is intended to minimize confusion and be more meaningful to Offsite Response Organizations when dealing with Hydro plant Emergency Action Plans expected to take place in 2016. No Reduction in Effectiveness.

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Part IV. Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change (Address each function identified in Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part IV of associated Screen):

10CFR50.47(b)(1) Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

Functions;

- (1) Responsibility for emergency response is assigned.*
- (2) The response organization has the staff to respond and to augment staff on a continuing basis (i.e., 24/7 support) in accordance with the emergency plan.*

Element;

NUREG-0654 Criterion A.1.a Each plan shall identify the State, local, Federal and private sector organizations (including utilities), that are intended to be part of the overall response organization for Emergency Planning Zones. (See Appendix 5).

NUREG-0654 Criterion A.3 Each plan shall include written agreements referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones. The agreements shall identify the emergency measures to be provided and the mutually acceptable criteria for their implementation, and specify the arrangements for exchange of information. These agreements may be provided in an appendix to the plan or the plan itself may contain descriptions of these matters and a signature page in the plan may serve to verify the agreements.

The signature page format is appropriate for organizations where response functions are covered by laws, regulations or executive orders where separate written agreements are not necessary.

NUREG-0654 Criterion A.8 Each licensee shall specify the contractor and private organizations who may be requested to provide technical assistance to and augmentation of the emergency organization.

NUREG-0654 Criterion A.9 Each licensee shall identify the services to be provided by local agencies for handling emergencies, e.g., police, ambulance, medical, hospital, and fire-fighting organizations shall be specified. The licensee shall provide for transportation and treatment of injured personnel who may also be contaminated. Copies of the arrangements and agreements reached with contractor, private, and local support agencies shall be appended to the plan. The agreements shall delineate the authorities, responsibilities, and limits on the actions of the contractor, private organization, and Applicability and Cross Reference to Plans Licensee State Local services support groups.

10CFR50.47(b)(2) On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.

Functions:

- (1) The process ensures that onshift emergency response responsibilities are staffed and assigned.*
- (2) The process for timely augmentation of onshift staff is established and maintained.*

Element;

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NUREG-0654 Criterion B.9 Each licensee shall identify the services to be provided by local agencies for handling emergencies, e.g., police, ambulance, medical, hospital, and fire-fighting organizations shall be specified. The licensee shall provide for transportation and treatment of injured personnel who may also be contaminated. Copies of the arrangements and agreements reached with contractor, private, and local support agencies shall be appended to the plan. The agreements shall delineate the authorities, responsibilities, and limits on the actions of the contractor, private organization, and local services support groups.

10CFR50.47(b)(3) Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

Functions:

- (1) Arrangements for requesting and using offsite assistance have been made.
- (2) State and local staff can be accommodated at the EOF in accordance with the emergency plan.

Element;

NUREG-0654 Criterion C.4 Each organization shall identify nuclear and other facilities, organizations or individuals which can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement.

10CFR50.47(b)(4) A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Function:

A standard scheme of emergency classification and action levels is in use.

Element;

NUREG-0654 Criterion D A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures. **(1)** An emergency classification and emergency action level scheme as set forth in Appendix 1 must be established by the licensee. The specific instruments, parameters or equipment status shall be shown for establishing each emergency class, in the in-plant emergency procedures. The plan shall identify the parameter values and equipment status for Applicability and Cross Reference to Plans Licensee State Local each emergency class.

10CFR50.47(b)(12) Arrangements are made for medical services for contaminated injured individuals.

Function:

Arrangements are made for medical services for contaminated, injured individuals.

Element;

NUREG-0654 Criterion L.(1) Each organization shall arrange for local and backup hospital and medical services

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having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.(4) Each organization shall arrange for transporting victims of radiological accidents to medical support facilities.

Changes #1,2 were the result of updating the Letters of Agreement in Appendix 5. State of South Carolina coordinates the resources of the SC Highway Patrol and SC Law enforcement. No Reduction in effectiveness
Changes #3,4,7,8,9 were the result of updating the Letters of Agreement in Appendix 5. Greenville Health System acquired Oconee Medical Center and Blue Ridge Emergency Physicians. The new Letter of Agreement does not reduce the capability of Greenville Health system to provide the required support and contains all the requirements for use of facilities, personnel, equipment and participation in training and drills. No Reduction in Effectiveness

Part V. Description of Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions:

10CFR50.47(b)(1) Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

Functions;

- (1) Responsibility for emergency response is assigned.*
- (2) The response organization has the staff to respond and to augment staff on a continuing basis (i.e., 24/7 support) in accordance with the emergency plan.*

Element;

NUREG-0654 Criterion A.1.a Each plan shall identify the State, local, Federal and private sector organizations (including utilities), that are intended to be part of the overall response organization for Emergency Planning Zones. (See Appendix 5).

NUREG-0654 Criterion A.3 Each plan shall include written agreements referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones. The agreements shall identify the emergency measures to be provided and the mutually acceptable criteria for their implementation, and specify the arrangements for exchange of information. These agreements may be provided in an appendix to the plan or the plan itself may contain descriptions of these matters and a signature page in the plan may serve to verify the agreements.

The signature page format is appropriate for organizations where response functions are covered by laws, regulations or executive orders where separate written agreements are not necessary.

NUREG-0654 Criterion A.8 Each licensee shall specify the contractor and private organizations who may be requested to provide technical assistance to and augmentation of the emergency organization.

NUREG-0654 Criterion A.9 Each licensee shall identify the services to be provided by local agencies for handling emergencies, e.g., police, ambulance, medical, hospital, and fire-fighting organizations shall be specified. The licensee shall provide for transportation and treatment of injured personnel who may also be contaminated. Copies of the arrangements and agreements reached with contractor, private, and local support agencies shall be appended to the plan. The agreements shall delineate the authorities, responsibilities, and limits on the actions of the contractor, private organization, and Applicability and Cross Reference to Plans Licensee

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State Local services support groups.

10CFR50.47(b)(2) On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.

Functions:

- (1) The process ensures that onshift emergency response responsibilities are staffed and assigned.
- (2) The process for timely augmentation of onshift staff is established and maintained.

Element;

NUREG-0654 Criterion B.9 Each licensee shall identify the services to be provided by local agencies for handling emergencies, e.g., police, ambulance, medical, hospital, and fire-fighting organizations shall be specified. The licensee shall provide for transportation and treatment of injured personnel who may also be contaminated. Copies of the arrangements and agreements reached with contractor, private, and local support agencies shall be appended to the plan. The agreements shall delineate the authorities, responsibilities, and limits on the actions of the contractor, private organization, and local services support groups.

10CFR50.47(b)(3) Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

Functions:

- (1) Arrangements for requesting and using offsite assistance have been made.
- (2) State and local staff can be accommodated at the EOF in accordance with the emergency plan.

Element;

NUREG-0654 Criterion C.4 Each organization shall identify nuclear and other facilities, organizations or individuals which can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement.

10CFR50.47(b)(4) A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Function:

A standard scheme of emergency classification and action levels is in use.

Element;

NUREG-0654 Criterion D A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum

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initial offsite response measures.(1) An emergency classification and emergency action level scheme as set forth in Appendix 1 must be established by the licensee. The specific instruments, parameters or equipment status shall be shown for establishing each emergency class, in the in-plant emergency procedures. The plan shall identify the parameter values and equipment status for Applicability and Cross Reference to Plans Licensee State Local each emergency class.

10CFR50.47(b)(12) Arrangements are made for medical services for contaminated injured individuals.

Function:

Arrangements are made for medical services for contaminated, injured individuals.

Element:

NUREG-0654 Criterion L.(1) Each organization shall arrange for local and backup hospital and medical services having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.(4) Each organization shall arrange for transporting victims of radiological accidents to medical support facilities.

Changes 1,2,3,4,7,8,9,22,24,25,26,27 and 28 have no impact on the Emergency Plan. Changes were the result of the state of South Carolina taking responsibility for coordinating the SC Highway Patrol and SC Law enforcement Division and the Greenville Health System taking over the responsibilities of Oconee Medical Center and Blue Ridge Physicians. no Reduction in Effectiveness.

Changes 5 and 6 are an enhancement, storing the LOA's electronically and referencing where these records can be retrieved. no Reduction in Effectiveness.

Changes 10 and 11 are an enhancement to the definition of explosion in response to site lessons learned to limit the delay in classification of events, does not affect the EAL scheme no Reduction in Effectiveness.

Changes 12,13,14,15,16,17,18,19 and 20 are an enhancement to the definition of Condition A and Condition B in response to an impending change in FERC standards in relation to Hydro EAPs. The change is intended to minimize confusion and be more meaningful to Offsite Response Organizations when dealing with Hydro plant Emergency Action Plans expected to take place in 2016. No Reduction in Effectiveness.

Emergency responsibilities of supporting organizations continue to be assigned.

Interfaces among offsite response activities are specified.

Arrangements for requesting and effectively using assistance resources continue to be in place.

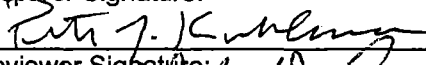
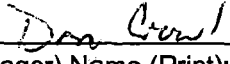
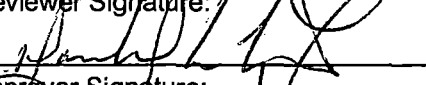
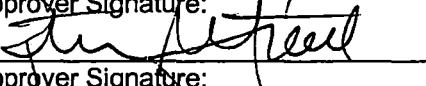
A standard emergency classification and action level scheme continues to be in place.

Arrangements continue to be in place for medical services for contaminated injured individuals.

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Part VI. Evaluation Conclusion.			
Answer the following questions about the proposed change.			
1	Does the proposed change comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E?	Yes X	No <input type="checkbox"/>
2	Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)?	Yes X	No <input type="checkbox"/>
3	Does the proposed change maintain the current Emergency Action Level (EAL) scheme?	Yes X	No <input type="checkbox"/>
4	Choose one of the following conclusions:		
a	The activity does continue to comply with the requirements of 10 CFR 50.47(b) and 10 CFR 50, Appendix E, and the activity does not constitute a reduction in effectiveness or change in the current Emergency Action Level (EAL) scheme. Therefore, the activity can be implemented without prior NRC approval.	X	
b	The activity does not continue to comply with the requirements of 10 CFR 50.47(b) or 10 CFR 50 Appendix E or the activity does constitute a reduction in effectiveness or EAL scheme change. Therefore, the activity cannot be implemented without prior NRC approval.	<input type="checkbox"/>	
Part VII. Disposition of Proposed Change Requiring Prior NRC Approval			
Will the proposed change determined to require prior NRC approval be either revised or rejected?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
If No, then initiate a License Amendment Request in accordance 10 CFR 50.90 and AD-LS-ALL-0002, Regulatory Correspondence, and include the tracking number: _____.			

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Part VIII. Signatures: EP CFAM Final Approval is required for changes affecting risk significant planning standard 10 CFR 50.47(b)(4).		
Preparer Name (Print): Peter Kuhlman	Preparer Signature: 	Date: 12/12/16
Reviewer Name (Print): Don Crowl 	Reviewer Signature: 	Date: 12/21/16
Approver (EP Manager) Name (Print): Pat Street	Approver Signature: 	Date: 1/3/17
Approver (CFAM, as required) Name (Print): Mike Austin	Approver Signature: ELECTRONIC SIGNATURE W/ ARS	Date: 1/4/17
<p>If the proposed activity is a change to the E-Plan or implementing procedures, then create two EREG General Assignments.</p> <p>One for EP to provide the 10 CFR 50.54(q) summary of the analysis, or the completed 10 CFR 50.54(q), to Licensing. <input type="checkbox"/></p> <p>One for Licensing to submit the 10 CFR 50.54(q) information to the NRC within 30 days after the change is put in effect. <input type="checkbox"/></p>		

QA RECORD

PLANNED ACTIONS

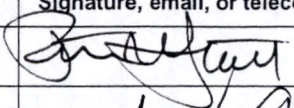
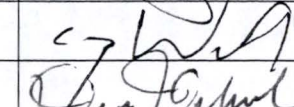
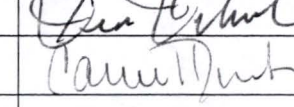
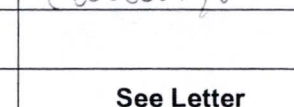
**Outgoing Regulatory Correspondence
Review & Approval Documentation**

<input type="checkbox"/> BNP	<input type="checkbox"/> CNS	<input type="checkbox"/> CR3	<input type="checkbox"/> HNP	<input type="checkbox"/> MNS	<input type="checkbox"/> NGO	<input checked="" type="checkbox"/> ONS	<input type="checkbox"/> RNP	<input type="checkbox"/> WLS	<input type="checkbox"/> LNP	<input type="checkbox"/> HAR	<input type="checkbox"/> Other
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Letter Number: ONS-2017-011

PART IV -- REVIEW AND APPROVAL

Each Reviewer and Approver by their signature attests that, to the best of his or her knowledge, the input provided is accurate, complete, and free from Material False Statement.

Reviewer / Approver	Title / Organization	Signature, email, or telecom	Date
Pat Street	Emergency Preparedness Manager		1/29/17
Chris Wasik	Regulatory Affairs Manager		1/30/17
Dean Hubbard	Director, Organizational Effectiveness		2-2-17
Carrie Dunton	Director, Site Support		2/2/17
Signature Authority	ONS Site VP, Tom Ray	See Letter	

Oath or Affirmation required on cover letter or enclosures? Yes ☐ No ☒Return To: Miki Shealy
Regulatory Affairsx3057
Extension

Outgoing Regulatory Correspondence Review & Approval Documentation

1.0 Information

1. This matrix identifies NRC correspondence, the lowest management level allowed to sign, and whether or **NOT** the correspondence must be submitted under oath or affirmation. Management levels higher than the lowest indicated may sign the designated correspondence. This matrix is **NOT** an all-encompassing list of NRC correspondence. The Correspondence Preparer should refer to the regulatory requirement for specific submittal requirements.

	CORRESPONDENCE	OFFICER (Note 1)	DEPT MGR (Note 2)	OATH OR AFFIRMATION REQUIRED
1.	License Applications [50.30(b) or 72.16(b)] [10 CFR 50.30] and amendments or supplements to applications	X		X
2.	License Amendments [10 CFR 50.90]	X		X
3.	Subsequent correspondence supporting a proposed license amendment or license application (e.g., Request for Additional Information)	X		X
4.	UFSAR Updates [50.71(e)(2)] [10 CFR 50.71(e)(2)]	X		X
5.	Changes to the QAPM NOT requiring NRC approval [50.54(a)(3), 50.71(e)(2)] [10 CFR 50.71(e)(2)]		X	
6.	Changes to the QAPM requiring NRC approval [50.54(a)(4)]	X		
7.	Responses to requests for information made under 50.54(f) or 72.44(b)(3) and supplements to that information	X		X
8.	Changes to safeguards contingency plan, security plan, or guard training and qualification plan requiring NRC approval [50.30(b), 50.54(p)(1), 50.90] [10 CFR 50.30]	X		X
9.	Changes to the safeguards contingency plan, the security plan, or the guard training and qualification plan NOT requiring NRC approval [50.54(p)(2)]		X	
10.	Changes to the emergency plan [50.54(q)]		X	
11.	Medical fitness of license applicant (as documented on Form NRC-396) [55.23] (Note 2)	X		
12.	Operator License Applications (as documented on Form NRC-398) [55.31(a)] or Additional Information Regarding Operator License Applications (as documented on Form NRC-398) [55.31(b)]	X		
13.	Responses to Notices of Violation [2.201]		X	
14.	NRC Orders [2.202(a)(2) and (b)]	X		X

Outgoing Regulatory Correspondence Review & Approval Documentation

1.0 Information (continued)

	CORRESPONDENCE	OFFICER (Note 1)	DEPT MGR (Note 2)	OATH OR AFFIRMATION REQUIRED
15.	Demand For Information Pursuant to 10 CFR 2.204 and supplements to that information	X		X
16.	Notifications of failures to comply or existence of defects [21.21]	X		
17.	Licensee Event Reports, Special Reports, and Security Incident Reports		X	
18.	Specific exemptions to Part 50 and Part 72 regulations [50.12] [72.7]		X	
19.	Proposed exemptions and alternatives to ASME Code requirements [50.55a(a)(3), (f)(5), and (g)(5)]		X	
20.	Validation of permanent cessation of operations and permanent fuel removal [50.82(a)(1)]	X		X
21.	Status of Decommissioning Funding per 10 CFR 50.75(f)(1)		X	
22.	Liability Insurance Coverage per 10 CFR 140.15(a)(1)		X	
23.	Property Insurance Coverage per 10 CFR 50.54(w)(2),		X	
24.	Licensee Guarantee of Payment of Deferred Premiums per 10 CFR 140.21(e)		X	
26.	Proof of Financial Protection per 10 CFR 140.15(b) and (e).		X	
27.	Fitness for Duty Program Data		X	
28.	Quality Assurance Program Transport of Radioactive Materials		<u>X</u>	
29.	Docketed correspondence NOT meeting any of the above		X	

NOTES

1	<p>The Chief Nuclear Officer (CNO) has the authority to sign all outgoing correspondence to the NRC. In addition, the following NGD officers have been granted final signature authority from the CNO:</p> <p>Senior Vice Presidents Nuclear Operations Senior Vice Presidents Nuclear Engineering Site Vice Presidents Vice President Nuclear Vice President, Corporate Governance & Operation Support Vice President, Organizational Effectiveness and Regulatory Affairs Vice President Nuclear Plant Development</p>
2	<p>Department managers are direct reports to vice presidents.</p> <p>Direct reports (Managers) to Vice Presidents at the Sites and General Office may sign submittals that require Oath or Affirmation provided such delegation of signature authority has been provided in writing by one of the above officers in advance. For all other submittals generated at the Site or General Office, direct reports to the Site and General Office VPs and the above Managers may sign submittals provided such delegation of signature authority has been provided in writing in advance.</p>