



Duke Energy

ACTION REQUEST - 02152281

Action Request Details

Type : EREG Orig Date : 09/20/2017 14:43 Discovery Date :
Subject : CNS EPlan change for Standard ERO

Description

CONTACT SITE EP SUPERVISOR FOR ASSISTANCE IN PREPARING EP01, EP02, AND EP03. ENSURE EREG IS CROSS-REFERENCED TO THE REG AR WHICH INITIATED IT. Complete 50.54q per AD-EP-ALL-0602.

Notes

Priority : Report To : Status : APPROVED 09/20/2017
Severity : Due Date : 10/26/2017 Event Date :
Originator : I18938 Originator Group :
Facility : NCP Department : 44278 Organization :
Owed To : Owed To Group : QUALREVIEW
Owed To Fac : CN Department : Discipline :

Action Request Status History

Updated Date	Updated By	AR Status	AR Due Date
09/20/2017	I18938	INPROG	10/26/2017
09/20/2017	I18938	APPROVED	

Action Request Attributes

Request Attribute	Values	Reqd	Date
BOUNDED EREG AR	N	Y	09/20/2017
Name	: MATTHEW L NELSON		

Request Attribute	Values	Reqd	Date
EREG AR CROSS XREF	Y	Y	09/20/2017
Name	: MATTHEW L NELSON		

Request Attribute	Values	Reqd	Date
REG AR CROSS XREF	Y	Y	09/20/2017
Name	: MATTHEW L NELSON		



Duke Energy

ACTION REQUEST - 02152281

Action Request Notes

Action Request Routing/Return Comments

Routing Comments from the X601 Panel

*** No Routing Comments Found ***

Updated On

Updated By

Routing Comments from the X602 Panel

*** No Return Comments Found ***

Updated On

Updated By

Action Request Approval Review

Route List : 001

Route List Initiator :

<u>Passport</u>	<u>Fac</u>	<u>Group</u>	<u>/</u>	<u>Type</u>	<u>Send</u>	<u>Send</u>	<u>Action</u>	<u>Action</u>	<u>Date</u>	<u>/</u>	<u>Time</u>	<u>Last Name</u>
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Action Request Trend/Cause

Action Request Keywords

<u>Keyword</u>	<u>Keyword Description</u>
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Action Request Reference Documents

<u>Facility</u>	<u>Doc</u>	<u>Sub</u>	<u>Document</u>	<u>Sheet</u>	<u>Rev</u>	<u>Minor</u>	<u>Rev</u>	<u>Title</u>
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Action Request Reference Equipment

<u>Facility</u>	<u>Unit</u>	<u>System</u>	<u>Equip</u>	<u>Equip</u>	<u>Equip</u>	<u>Equip</u>	<u>Rev</u>	<u>Rev</u>
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Duke Energy

ACTION REQUEST - 02152281

Action Request Cross References

Ref Type	Ref Nbr	Ref Sub	Ref Nbr Type	Status	Limit AR Cls	Description
AR	02147650		DRR	COMPLETE	N	EPA B rev 163
AR	02147652		DRR	COMPLETE	N	EPA E Rev 148
AR	02147654		DRR	COMPLETE	N	EPA G rev 161
AR	02147655		DRR	COMPLETE	N	EPA H Rev 149
AR	02147657		DRR	COMPLETE	N	EPA I Rev 147
AR	02147659		DRR	COMPLETE	N	EPA J rev 147
AR	02147664		DRR	COMPLETE	N	EPA K rev 144
AR	02147666		DRR	COMPLETE	N	EPA M rev 161
AR	02147671		DRR	COMPLETE	N	EPA P rev 147
AR	02147943		5AD	COMP-NA	N	EPA E - 0021005214 CNS EMERGENCY PLAN SECTION E -
AR	02148298		5AD	COMP-NA	N	EPA B - 0021011193 CNS EMERGENCY PLAN SECTION B-SITE
AR	02148394		5AD	COMP-NA	N	EPA G - 0021011195 CNS EMERGENCY PLAN SECTION G - PUBLIC
AR	02148481		5AD	COMP-NA	N	EPA I - 0021005777 CNS EMERGENCY PLAN SECTION I - ACCIDENT
AR	02148663		5AD	COMP-NA	N	EPA J - 0021005306 CNS EMERGENCY PLAN SECTION J - PROTECTIVE
AR	02148690		5AD	COMP-NA	N	EPA K - 0021011196 CNS EMERGENCY PLAN SECTION K -
AR	02148769		5AD	COMP-NA	N	EPA M - 0021011198 CNS EMERGENCY PLAN SECTION M - RECOVERY
AR	02148791		5AD	COMP-NA	N	EPA P - 0021005285 CNS EMERGENCY PLAN SECTION P -
AR	02151562		DRR	COMPLETE	N	EPA A rev 150
AR	02151584		DRR	COMPLETE	N	EPA O rev 144
AR	02152021		5AD	COMP-NA	N	EPA A - 0021011172 CNS EMERGENCY PLAN SECTION A-ASSIGNMENT
AR	02152058		5AD	COMP-NA	N	EPA O - 0021011199 CNS EMERGENCY PLAN SECTION O -
AR	02152146		5AD	COMP-NA	N	EPA H - 0021005362 CNS EMERGENCY PLAN SECTION H - EMERGENCY

Action Request Assignment Details

ASSIGNMENT NUMBER : 01 SUB :



Duke Energy

ACTION REQUEST - 02152281

Type	: EP01	Due Date	: 09/20/2017	Pri Resp Fac	:
Status	: COMPLETE	Reschedule	:	Pri Resp Group	:
Assigned To	: MATTHEW L NELSON			Sec Resp Fac	:
Subject	: 50.54(Q) SCREEN			Sec Resp Group	:
Aff Facility	: CN	Unit	:	System	:
UCR	:	Schedule Ref	:		
Organization	:	Department	: 44278	Discipline	:
Est Manhrs	:	Ext Comp Date	:		

Description

COMPLETE 50.54(Q) SCREEN IN ACCORDANCE WITH AD-EP-ALL-0602.

Action Request Assignment Completion Notes

Enclosures in E-folder for main AR. This action is complete.

Action Request Assignment Status History

<u>Updated Date</u>	<u>Updated By</u>	<u>Assgn Status</u>	<u>Assgn Due Date</u>
09/20/2017	I18938	INPROG	
09/20/2017	I18938		09/20/2017
09/20/2017	I18938	ACC/ASG	
09/20/2017	I18938	AWAIT/C	
09/21/2017	TAA7322	COMPLETE	
09/21/2017	I18938	INPROG	
09/21/2017	I18938	ACC/ASG	
09/21/2017	I18938	AWAIT/C	
09/21/2017	I44004	ACC/ASG	
09/21/2017	I18938	AWAIT/C	
09/21/2017	TAA7322	COMPLETE	

Action Request Assignment Attributes

Action Request Assignment Routing/Return Comments

Routing Comments from the X601 Panel
requested from preparer

<u>Updated On</u>	<u>Updated By</u>
20170921	I44004



Duke Energy

ACTION REQUEST - 02152281

Routing Comments from the X602 Panel

*** No Return Comments Found ***

Updated On

Updated By

Action Request Assignment Completion Approval

Route List : 001

Route List Initiator : 118938

<u>Passport</u>	<u>Fac</u>	<u>Group</u>	<u>/</u>	<u>Type</u>	<u>Send</u> <u>Date</u>	<u>Send</u> <u>Time</u>	<u>Action</u> <u>Taken</u>	<u>Action</u> <u>Date</u>	<u>/</u>	<u>Time</u>	<u>Last Name</u>
EMK7353				A	09/20/2017	17:39	APPROVED	09/20/2017		17:44	KUHR
TAA7322	CN	EPSUPV		A	09/20/2017	17:44	APPROVED	09/21/2017		08:22	ARLOW

Route List : 002

Route List Initiator : 118938

<u>Passport</u>	<u>Fac</u>	<u>Group</u>	<u>/</u>	<u>Type</u>	<u>Send</u> <u>Date</u>	<u>Send</u> <u>Time</u>	<u>Action</u> <u>Taken</u>	<u>Action</u> <u>Date</u>	<u>/</u>	<u>Time</u>	<u>Last Name</u>
I44004				A	09/21/2017	10:11	RETURNED	09/21/2017		10:13	FISCHER
TAA7322	CN	EPSUPV		A	09/21/2017	10:19	APPROVED	09/21/2017		10:48	ARLOW
I44004				A	09/21/2017	10:16	APPROVED	09/21/2017		10:19	FISCHER

Action Request Assignment Cause/Action

Action Request Assignment Reference Documents

<u>Facility</u>	<u>Doc</u> <u>Type</u>	<u>Sub</u> <u>Type</u>	<u>Document</u>	<u>Sheet</u>	<u>Rev</u>	<u>Minor</u> <u>Rev</u>	<u>Title</u>
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Action Request Assignment Reference Equipment

<u>Facility</u>	<u>Unit</u>	<u>System</u>	<u>Equip</u> <u>Type</u>	<u>Equip</u> <u>Number</u>	<u>Equip</u> <u>Tag</u>	<u>Equip</u> <u>Status</u>	<u>Rev</u>	<u>Rev</u> <u>Status</u>
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Action Request Assignment Cross References

<u>Ref</u> <u>Type</u>	<u>Ref</u> <u>Nbr</u>	<u>Ref</u> <u>Sub</u>	<u>Ref Nbr</u> <u>Type</u>	<u>Status</u>	<u>Limit</u> <u>AS CIs</u>	<u>Description</u>
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Duke Energy

ACTION REQUEST - 02152281

Action Request Assignment Appendices

APPENDIX 1

<< 10 CFR 50.54(q) Screening Evaluation Form >>

Screening and Evaluation Number				Applicable Sites																									
EREG #: 2152281				BNP	<input type="checkbox"/>																								
				CNS	<input checked="" type="checkbox"/>																								
				CR3	<input type="checkbox"/>																								
				HNP	<input type="checkbox"/>																								
5AD #: <table border="1"><tr><td>EPA A</td><td>2151562</td><td>EPA J</td><td>2148663</td></tr><tr><td>EPA B</td><td>2148298</td><td>EPA K</td><td>2148690</td></tr><tr><td>EPA E</td><td>2147943</td><td>EPA M</td><td>2148769</td></tr><tr><td>EPA G</td><td>2148394</td><td>EPA O</td><td>2152058</td></tr><tr><td>EPA H</td><td>2152146</td><td>EPA P</td><td>2148791</td></tr><tr><td>EPA I</td><td>2148481</td><td></td><td></td></tr></table>				EPA A	2151562	EPA J	2148663	EPA B	2148298	EPA K	2148690	EPA E	2147943	EPA M	2148769	EPA G	2148394	EPA O	2152058	EPA H	2152146	EPA P	2148791	EPA I	2148481			MNS	<input type="checkbox"/>
				EPA A	2151562	EPA J	2148663																						
				EPA B	2148298	EPA K	2148690																						
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EPA I	2148481																												
ONS	<input type="checkbox"/>																												
RNP	<input type="checkbox"/>																												
GO	<input type="checkbox"/>																												
Document and Revision CN-ADMN-EPLAN-MANUAL, for section revision numbers see summary of changes.				Catawba Emergency Plan																									
Part I. Description of Activity Being Reviewed (event or action, or series of actions that may result in a change to the emergency plan or affect the implementation of the emergency plan):																													
<p>In conjunction with the common EOF for BNP, HNP, and RNP, an initiative was undertaken by Duke Energy to standardize the augmenting ERO positions, functions and responsibilities (tasks) across the fleet. This involves changes to the current CNS augmenting ERO, based on the number of responders and their titles identified in the site emergency plan and implementing procedures. Included in the standard ERO initiative is the development of fleet standard ERO checklists, procedures and forms. Note – this initiative makes no changes to the on-shift ERO or 45 minute augmenting response positions.</p> <p>Enclosure 1 is the CNS ERO Position Comparison and Evaluation – TSC/OSC</p> <p>Enclosure 2 is the CNS ERO Position Comparison and Evaluation – JIC</p> <p>Enclosure 3 is the EOF ERO Position Comparison and Evaluation</p> <p>Enclosure 4 is the detailed summary of the Emergency Plan changes</p> <p>Enclosures are located in the CAS E-Folder.</p> <p>The following changes are outside the Fleet Standard ERO project and will be evaluated separately within this evaluation.</p> <ul style="list-style-type: none">• EPA G Section G.2 - changed emergency "planning" to emergency "preparedness"• EPA G Section G.4.c:<ul style="list-style-type: none">○ reordered county, state, and federal in logical order○ deleted capitalization of "portal"○ corrected spelling of "government"																													

<< 10 CFR 50.54(q) Screening Evaluation Form >>

- EPA I Section I.1 - added bases information from EPA section D discussion on the CNS NEI 99-01 Rev. 6 EAL upgrade.
- EPA I Section I.9 - added the following at the end of the paragraph; "OR a count rate meter utilizing direct corrected count rate (ccpm) of the Silver Zeolite or equivalent cartridge cross-referenced against an estimated Iodine-131 microCi/cc concentration attachment."
- EPA J Section J.7 - added "General Emergency" to RP/0/A/5000/005
- EPA K Section K.2 - changed "Procedures" to "Site procedures" in the last sentence
- Section O.1.a - Replaced CNS Addendum 7111.0 with new procedure AD-EP-ALL-0500, Emergency Response Training.
- Section O.2.a - Replaced EP Group Manual Guideline 5.4.1 with AD-EP-ALL-0500 (first sentence)
- Section O.2.a - Replaced EP Group Manual Guideline 5.4.1, ETQS 7111.00 and CNS Addendum 7111.0 with AD-EP-ALL-0500 (last sentence)
- Section O.2.c - Replaced Nuclear System Directive 112 and CNS Training Addendum 7111.0 with AD-TQ-ALL-0086, Fire Brigade and Hazmat Training
- Section O.2.d - Corrected title for PT/0/B/4600/006 "Exercises and"
- Section O.3 Replaced Nuclear System Directive 119 with AD-SY-ALL-0280, Medical Emergency Response Team (MERT) and Technical Rescue Training.

Part II. Activity Previously Reviewed?

Is this activity Fully bounded by an NRC approved 10 CFR 50.90 submittal or Alert and Notification System Design Report?

If yes, identify bounding source document number or approval reference and ensure the basis for concluding the source document fully bounds the proposed change is documented below:

Justification:

EPA I Section I.1 - added bases information from EPA section D discussion on the CNS NEI 99-01 Rev. 6 EAL upgrade.

The CNS Technical Basis for the development of Initiating Conditions and Emergency Action Levels changed

FROM

NUMARC/NESP-007, Revision 2, Methodology for Development of Emergency Action Levels, endorsed by the NRC in Regulatory Guide 1.101, Rev. 3, August 1992, as an alternative methodology for the development of Emergency Action Levels

TO

Nuclear Energy Institute (NEI) 99-01, Revision 6 (Development of Emergency Action Levels for Non-Passive Reactors),

Yes

☐

No

☒

10 CFR 50.54(q) Effectiveness Evaluation is not required. Enter justification below and complete Attachment 4, Part V.

Continue to Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part III

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 3

ATTACHMENT 4

Page 3 of 6

<< 10 CFR 50.54(q) Screening Evaluation Form >>

<p>which was endorsed by the NRC in a letter dated March 28, 2013 from Mark Thaggard (U.S. Nuclear Regulatory Commission) to Susan Perkins-Grew (Nuclear Energy Institute), titled "U.S. Nuclear Regulatory Commission Review and Endorsement of NEI 99-01, Revision 6, November 2012 (ML1 2346A463)."</p> <p>The NRC approved the license amendments for CNS to adopt an emergency action level scheme based on the Nuclear Energy Institute (NEI) 99-01, Revision 6 (Development of Emergency Action Levels for Non-Passive Reactors). Date of Issuance, on April 18, 2016. (ML16082A038)</p> <p>DUKE ENERGY CAROLINAS. LLC DOCKET NO. 50-413 CATAWBA NUCLEAR STATION, UNIT 1 AMENDMENT TO RENEWED FACILITY OPERATING LICENSE Amendment No. 279 to RFOL No. NPF-35</p> <p>DUKE ENERGY CAROLINAS. LLC DOCKET NO. 50-414 CATAWBA NUCLEAR STATION, UNIT 2 AMENDMENT TO RENEWED FACILITY OPERATING LICENSE Amendment No. 275 to RFOL No. NPF-52</p>									
Bounding document attached (optional)		<input type="checkbox"/>							
<p>Part III. Editorial Change</p> <p>Is this activity an editorial or typographical change only, such as formatting, paragraph numbering, spelling, or punctuation that does not change intent?</p> <p>Justification:</p> <p>See Enclosure 4 that lists changes that are editorial as described in AD-EP-ALL-0602 Emergency Plan Change Screening and Effectiveness Evaluations 10 CFR 50.54(Q). These editorial changes require no further evaluation.</p>	<table border="1"> <thead> <tr> <th>Yes</th> <th><input type="checkbox"/></th> <th>No</th> <th><input checked="" type="checkbox"/></th> </tr> </thead> <tbody> <tr> <td>10 CFR 50.54(q) Effectiveness Evaluation is not required. Enter justification and complete Attachment 4, Part V.</td> <td></td> <td>Continue to Attachment 4, Part IV and address non editorial changes</td> <td></td> </tr> </tbody> </table>	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	10 CFR 50.54(q) Effectiveness Evaluation is not required. Enter justification and complete Attachment 4, Part V.		Continue to Attachment 4, Part IV and address non editorial changes	
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>						
10 CFR 50.54(q) Effectiveness Evaluation is not required. Enter justification and complete Attachment 4, Part V.		Continue to Attachment 4, Part IV and address non editorial changes							

EMERGENCY PLAN CHANGE SCREENING AND
EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)

AD-EP-ALL-0602

Rev. 3

ATTACHMENT 5

Page 1 of 8

<< 10 CFR 50.54(q) Effectiveness Evaluation Form >>

Screening and Evaluation Number				Applicable Sites																									
EREG #: 2152281				BNP	<input type="checkbox"/>																								
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				EPA A	2151562	EPA J	2148663																						
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Document and Revision CN-ADMN-EPLAN-MANUAL, for section revision numbers see summary of changes.		Catawba Emergency Plan																											
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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 <input type="checkbox"/> No <input checked="" type="checkbox"/>																								

<< 10 CFR 50.54(q) Effectiveness Evaluation Form >>

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

Licensing Basis of the ERO

CNS Emergency Plan Revision 2 (dated January 1983), revision 97-1 (dated January 1997), and revision 11-2 (dated September 2011) reflect the NRC approved versions related to the augmenting ERO. The augmenting ERO documented in the current CNS E-Plan, Revision 162, bounds the NRC approved E-Plan augmenting ERO and is used as the basis for the detailed comparison and evaluation provided in Enclosures 2, 3, and 4.

List Commitments Associated with the Change

A search to identify site specific commitments related to the ERO positions and their assigned responsibilities was performed. No site specific commitments were identified aside from those in the Emergency Plan.

The differences in approved revisions and the current revisions of the Emergency Plans have been reviewed, and they have been determined to meet the regulatory requirements required during the course of revisions. Each revision has been reviewed by the NRC during the inspection process.

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):

The changes resulting from the adoption of the standard ERO establish a closer relationship between risk significant / key functions and the positions assigned those functions. The objective of the changes is to ensure that those functions and their processes are linked directly to the augmented minimum staffing positions to allow for optimum relief of on shift personnel and less complicated response execution following facility activation.

Refer to Enclosures 1, 2, and 3 for a detailed review of the differences between the current CNS augmenting ERO and the standard augmenting ERO, and the evaluation of those changes from the organizational hierarchy, position and response, and task-by-task levels.

The adoption of the standard augmenting ERO into the CNS Emergency Plan: (1) provides a response organization defined by specific structure and responsibilities, which is consistent with regulations and industry guidance, and (2) maintains an efficient augmentation capability for both minimum staffing and full staffing positions.

The adoption of the standard augmenting ERO into the CNS Emergency Plan does not alter the licensing basis and continues to meet the regulatory requirements of 10CFR50.47(b)(1), (b)(2), (b)(7), and 10CFR50 Appendix E, Section IV.A. This change does not alter, add or remove previous site specific commitments with regards to the augmenting ERO.

The Section I revision includes a description on the use of a frisker to measure radioiodine concentrations in addition to the method in the current Emergency Plan. There will continue to be adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition as required by 10 CFR 50.47(b)(9) and Appendix E to 10 CFR Part 50, IV.E.2.

The adoption of a fleet standard recovery organization and plan into the CNS Emergency Plan provides a flexible recovery organization based on the complexity of the event or recovery plan. This new recovery organization and plan is based on the current recovery organization and plan in place at HNP, which has been evaluated in drills and

<< 10 CFR 50.54(q) Effectiveness Evaluation Form >>

exercises. The adoption of a fleet standard recovery organization into the CNS Emergency Plan does not alter the licensing basis and continues to meet the regulatory requirements of 10CFR50.47(b)(13). This change does not alter, add or remove previous site specific commitments with regards to the recovery organization and plan.

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):

1. The following portion of planning standard §50.47(b)(1) is related to the change in adopting the standard augmenting ERO.
Primary responsibilities for emergency response by the nuclear facility licensee have been assigned, and each principal response organization has staff to augment its initial response on a continuous basis.

The functions for §50.47(b)(1) related to this change are:

- a. *Responsibility for emergency response is assigned.*
- b. *The response organization has the staff to respond and augment on a continuing basis (24/7 staffing) in accordance with the E-plan.*

The NUREG-0654 Part II.A elements for §50.47(b)(1) related to this change are:

- A.1.d. *Each organization shall identify a specific individual by title who shall be in charge of the emergency response.*
- A.2. *Each principal organization shall be capable of continuous (24-hour) operations for a protracted period. The individual in the principal organization who will be responsible for assuring continuity of resources (technical, administrative, and material) shall be specified by title.*

2. The following portion of planning standard §50.47(b)(2) is related to the change in adopting the standard augmenting ERO.
..., timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.

The function for §50.47(b)(2) related to this change is:

- b. *The process for timely augmentation of on shift staff is established and maintained.*

The NUREG-0654 Part II.B elements for §50.47(b)(2) related to this change are:

- B.3. *Each licensee shall identify a line of succession for the emergency coordinator position and identify the specific conditions for higher level utility officials assuming this function.*
- B.4. *Each licensee shall establish the functional responsibilities assigned to the emergency coordinator and shall clearly specify which responsibilities may not be delegated to other elements of the emergency organization. Among the responsibilities which may not be delegated shall be the decision to notify and to recommend protective actions to authorities responsible for offsite emergency measures.*
- B.5. *Each licensee shall specify the positions or title and major tasks to be performed by the persons to be assigned to the functional areas of emergency activity. For emergency situations, specific assignments shall be made for all shifts and for plant staff members, both onsite and away from the site. These assignments shall cover the emergency functions in Table B-1 entitled, "Minimum Staffing Requirements for Nuclear Power Plant Emergencies." The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency. This capability shall be as indicated in Table B-1.*

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B.7. Each licensee shall specify the corporate management, administrative, and technical support personnel who will augment the plant staff as specified in the table entitled "Minimum Staffing Requirements for Nuclear Power Plant Emergencies," (Table B-1)

3. The following portions of §50 Appendix E, Section IV.A are related to the change in adopting the standard augmenting ERO.
The organization for coping with radiological emergencies shall be described, including definition of authorities, responsibilities, and duties of individuals assigned to the licensee's emergency organization and the means for notification of such individuals in the event of an emergency. Specifically, the following shall be included:
 2. A description of the onsite emergency response organization (ERO) with a detailed discussion of:
 - a. Authorities, responsibilities, and duties of the individual(s) who will take charge during an emergency;
 - b. Plant staff emergency assignments;
 - c. Authorities, responsibilities, and duties of an onsite emergency coordinator who shall be in charge of the exchange of information with offsite authorities responsible for coordinating and implementing offsite emergency measures.
 3. A description, by position and function to be performed, of the licensee's headquarters personnel who will be sent to the plant site to augment the onsite emergency organization.
 4. Identification, by position and function to be performed, of persons within the licensee organization who will be responsible for making offsite dose projections, ...
4. The following portion of planning standard §50.47(b)(7) is related to the change in adopting the standard augmenting ERO.
Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

The function for §50.47(b)(7) related to this change are:

- a. Coordinated dissemination of public information during emergencies is established.

The NUREG-0654 Part II.G elements for §50.47(b)(5) related to this change are:

G.4.a Each principal organization shall designate a spokesperson who should have access to all necessary information.

5. The following portion of planning standard §50.47(b)(9) is associated with the addition of a frisker for measuring radioiodine concentrations.
Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

The function for §50.47(b)(9) related to this change are:

- a. Methods, systems, and equipment for assessment of radioactive releases are in use.

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The NUREG-0654 Part II.I elements for §50.47(b)(9) related to this change are:

I. 7 Each organization shall describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone which are an intrinsic part of the concept of operations for the facility.

I.8 Each organization, where appropriate, shall provide methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways. This shall include activation, notification means, field team composition, transportation, communication, monitoring equipment and estimated deployment times.

I.9 Each organization shall have a capability to detect and measure radioiodine concentrations in air in the plume exposure EPZ as low as 10⁻⁷ uci/cc (microcuries per cubic centimeter) under field conditions. Interference from the presence of noble gas and background radiation shall not decrease the stated minimum detectable activity.

6. The following portion of planning standard §50.47(b)(13) is associated with the change in adopting the standard recovery organization and plan.

General plans for recovery and reentry are developed.

The function for §50.47(b)(13) related to this change are:

- a. *Plans for recovery and reentry are developed.*

The NUREG-0654 Part II.M elements for §50.47(b)(13) related to this change are:

M.1 Each organization, as appropriate, shall develop general plans and procedures for reentry and recovery and describe the means by which decisions to relax protective measures (e.g., allow reentry into an evacuated area) are reached. This process should consider both existing and potential conditions.

M.2 Each licensee plan shall contain the position/title, authority and responsibilities of individuals who will fill key positions in the facility recovery organization. This organization shall include technical personnel with responsibilities to develop, evaluate and direct recovery and reentry operations.

M.3 Each licensee and State plan shall specify means for informing members of the response organizations that a recovery operation is to be initiated, and of any changes in the organizational structure that may occur.

M.4 Each plan shall establish a method for periodically estimating total population exposure.

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

There is no numeric change to the CNS augmenting ERO. Refer to Enclosures 1, 2, and 3 for a detailed review of the differences between the current CNS augmenting ERO and the standard augmenting ERO, and the evaluation of those changes.

1. Capability Assessment

All emergency response related functions and tasks performed by the current CNS augmenting ERO have been dispositioned against the standard ERO positions as documented in Enclosures 1, 2 and 3. Changes to ERO task assignments categorized as deviations were evaluated and determined not to degrade the capability to perform their particular function.

Additionally, all ERO tasks for each position have been formally defined, indexed to their corresponding planning standard, and listed in the Emergency Plan Implementing Procedures for Emergency Response Facility activation. These tasks can now be readily adopted into the ERO systematic approach to training based qualification process and easily associated with the drill and exercise evaluation performance objectives and demonstration criteria. Thus, the capability to determine performance vs. process issues and feedback to training of task level items is significantly improved.

2. Timeliness Assessment

The standard augmenting ERO, with minor modification, is based on the current augmenting ERO in place at CNS, MNS and ONS which has been evaluated in numerous drills and exercises. There are no changes to the on-shift ERO or 45 minute response positions as part of the standard augmenting ERO initiative.

The aspect of timeliness with regard to the ability of any position to perform their assigned responsibilities was further evaluated by a review of the impact of any new tasks assigned to a position by a process similar to that used in the on-shift staffing study task analysis. It was assumed there was no timeliness impact for positions that were not assigned new tasks or were only assigned new tasks which were determined to be undocumented and were actually performed by the position. New tasks are categorized as deviations. The aspects of overburden and overlap were considered in the determination of whether there was a potential adverse impact on timeliness to any assigned task. No position was identified with task overburden or overlap with regard to the addition of any responsibilities.

Based on the above, the adoption of the standard augmenting ERO will continue to maintain or improve the capability and timeliness of the CNS augmenting ERO to respond to an event and effectively perform their assigned tasks.

The Section I change to use a frisker to measure radioiodine concentrations in addition to the method in the current Emergency Plan is an enhancement. The change provides additional assurance that methods, systems, and equipment for assessment of radioactive releases are in use.

The adoption of a fleet standard recovery organization and plan ensures the Corporate EOF can be a part of the site recovery organization if needed. The standard recovery organization and plan continues to ensure plans for recovery and reentry are developed.

The changes described do not affect the emergency planning functions because the changes continue to ensure:

- Responsibilities for emergency response are assigned
- The response organization has the staff to respond and augment on a continuing basis (24/7 staffing) in accordance with the E-plan
- The process for timely augmentation of on shift staff is established and maintained
- Coordinated dissemination of public information during emergencies is established

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- Methods, systems, and equipment for assessment of radioactive releases are in use
- Plans for recovery and reentry are developed.

The changes described provide additional assurance that the normal plant operating organization and ERO has the ability and capability to:

- respond to an emergency;
- perform functions in a timely manner;
- effectively identify and take measures to ensure protection of the public health and safety; and
- effectively use response equipment and emergency response procedures.

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2	Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
3	Does the proposed change maintain the current Emergency Action Level (EAL) scheme?	Yes <input checked="" type="checkbox"/>	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.	<input checked="" type="checkbox"/>	
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"/>
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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:_____.

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
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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): Matthew Nelson	Preparer Signature: See CAS	Date: See CAS
Reviewer Name (Print): See CAS	Reviewer Signature: See CAS	Date: See CAS
Approver (EP Manager) Name (Print): See CAS	Approver Signature: See CAS	Date: See CAS
Approver (CFAM, as required) Name (Print): N/A	Approver Signature: N/A	Date: N/A
If the proposed activity is a change to the E-Plan or implementing procedures, then create two EREG General Assignments. If required by Section 5.5, Submitting Reports of Changes to the NRC, then create two EREG General Assignments.		
<ul style="list-style-type: none"> 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. 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"/> <input type="checkbox"/>

QA RECORD

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
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Part IV. Emergency Planning Element and Function Screen (Reference Attachment 1, Considerations for Addressing Screening Criteria)		
Does this activity involve any of the following, including program elements from NUREG-0654/FEMA REP-1 Section II? If answer is yes, then check box.		
1	10 CFR 50.47(b)(1) Assignment of Responsibility (Organization Control)	
1a	Responsibility for emergency response is assigned.	<input checked="" type="checkbox"/>
1b	The response organization has the staff to respond and to augment staff on a continuing basis (24-7 staffing) in accordance with the emergency plan.	<input checked="" type="checkbox"/>
2	10 CFR 50.47(b)(2) Onsite Emergency Organization	
2a	Process ensures that onshift emergency response responsibilities are staffed and assigned	<input type="checkbox"/>
2b	The process for timely augmentation of onshift staff is established and maintained.	<input checked="" type="checkbox"/>
3	10 CFR 50.47(b)(3) Emergency Response Support and Resources	
3a	Arrangements for requesting and using off site assistance have been made.	<input type="checkbox"/>
3b	State and local staff can be accommodated at the EOF in accordance with the emergency plan. (NA for CR3)	<input type="checkbox"/>
4	10 CFR 50.47(b)(4) Emergency Classification System	
4a	A standard scheme of emergency classification and action levels is in use. (Requires final approval of Screen and Evaluation by EP CFAM.)	<input type="checkbox"/>
5	10 CFR 50.47(b)(5) Notification Methods and Procedures	
5a	Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes (60 minutes for CR3) after declaration of an emergency and providing follow-up notification.	<input type="checkbox"/>
5b	Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway. (NA for CR3)	<input type="checkbox"/>
5c	The public ANS meets the design requirements of FEMA-REP-10, Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants, or complies with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter. (NA for CR3)	<input type="checkbox"/>

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Part IV. Emergency Planning Element and Function Screen (cont.)		
6	10 CFR 50.47(b)(6) Emergency Communications	
6a	Systems are established for prompt communication among principal emergency response organizations.	<input type="checkbox"/>
6b	Systems are established for prompt communication to emergency response personnel.	<input type="checkbox"/>
7	10 CFR 50.47(b)(7) Public Education and Information	
7a	Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway emergency planning zone (EPZ). (NA for CR3)	<input type="checkbox"/>
7b	Coordinated dissemination of public information during emergencies is established.	<input checked="" type="checkbox"/>
8	10 CFR 50.47(b)(8) Emergency Facilities and Equipment	
8a	Adequate facilities are maintained to support emergency response.	<input type="checkbox"/>
8b	Adequate equipment is maintained to support emergency response.	<input type="checkbox"/>
9	10 CFR 50.47(b)(9) Accident Assessment	
9a	Methods, systems, and equipment for assessment of radioactive releases are in use.	<input checked="" type="checkbox"/>
10	10 CFR 50.47(b)(10) Protective Response	
10a	A range of public PARs is available for implementation during emergencies. (NA for CR3)	<input type="checkbox"/>
10b	Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities. (NA for CR3)	<input type="checkbox"/>
10c	A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.	<input type="checkbox"/>
10d	KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public.	<input type="checkbox"/>
11	10 CFR 50.47(b)(11) Radiological Exposure Control	
11a	The resources for controlling radiological exposures for emergency workers are established.	<input type="checkbox"/>
12	10 CFR 50.47(b)(12) Medical and Public Health Support	
12a	Arrangements are made for medical services for contaminated, injured individuals.	<input type="checkbox"/>
13	10 CFR 50.47(b)(13) Recovery Planning and Post-accident Operations	
13a	Plans for recovery and reentry are developed.	<input checked="" type="checkbox"/>
14	10 CFR 50.47(b)(14) Drills and Exercises	
14a	A drill and exercise program (including radiological, medical, health physics and other program areas) is established.	<input type="checkbox"/>
14b	Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills are assessed via a formal critique process in order to identify weaknesses.	<input type="checkbox"/>
14c	Identified weaknesses are corrected.	<input type="checkbox"/>
15	10 CFR 50.47(b)(15) Emergency Response Training	
15a	Training is provided to emergency responders.	<input type="checkbox"/>

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
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Part IV. Emergency Planning Element and Function Screen (cont.)		
16	10 CFR 50.47(b)(16) Emergency Plan Maintenance	
16a	Responsibility for emergency plan development and review is established.	<input type="checkbox"/>
16b	Planners responsible for emergency plan development and maintenance are properly trained.	<input type="checkbox"/>
PART IV. Conclusion		
If no Part IV criteria are checked, a 10 CFR 50.54(q) Effectiveness Evaluation is not required, then complete Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part V. ATTACHMENT 4 Justification:		<input type="checkbox"/>
If any Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part IV criteria are checked, then complete Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part V and perform a 10 CFR 50.54(q) Effectiveness Evaluation. Program Element 4a requires final approval of Screen and Evaluation by EP CFAM.		<input checked="" type="checkbox"/>

Part V. Signatures:		
Preparer Name (Print): Matthew Nelson	Preparer Signature: See CAS	Date: See CAS
Reviewer Name (Print): See CAS	Reviewer Signature: See CAS	Date: See CAS
Approver (EP Manager Name (Print): See CAS	Approver Signature: See CAS	Date: See CAS
Approver (CFAM, as required) Name (Print) N/A	Approver Signature: N/A	Date: N/A

QA RECORD



Duke Energy

ACTION REQUEST - 02152281

Action Request Assignment Details

ASSIGNMENT NUMBER : 02 SUB :

Type	: EP02	Due Date	: 09/20/2017	Pri Resp Fac	:
Status	: COMPLETE	Reschedule	:	Pri Resp Group	:
Assigned To	: MATTHEW L NELSON			Sec Resp Fac	:
Subject	: 50.54(Q) EVALUATION			Sec Resp Group	:
Aff Facility	: CN	Unit	:	System	:
UCR	:	Schedule Ref	:		
Organization	:	Department	: 44278	Discipline	:
Est Manhrs	:	Ext Comp Date	:		

Description

COMPLETE 50.54(Q) EVALUATION IN ACCORDANCE WITH AD-EP-ALL- 0602.

Action Request Assignment Completion Notes

Enclosures in E-folder for main AR. This action is complete.

Action Request Assignment Status History

<u>Updated Date</u>	<u>Updated By</u>	<u>Assgn Status</u>	<u>Assgn Due Date</u>
09/20/2017	I18938	INPROG	
09/20/2017	I18938		09/20/2017
09/20/2017	I18938	ACC/ASG	
09/20/2017	I18938	AWAIT/C	
09/21/2017	TAA7322	COMPLETE	
09/21/2017	I18938	INPROG	
09/21/2017	I18938	ACC/ASG	
09/21/2017	I18938	AWAIT/C	
09/21/2017	TAA7322	COMPLETE	

Action Request Assignment Attributes



Duke Energy

ACTION REQUEST - 02152281

Action Request Assignment Routing/Return Comments

Routing Comments from the X601 Panel

*** No Routing Comments Found ***

Updated On

Updated By

Routing Comments from the X602 Panel

*** No Return Comments Found ***

Updated On

Updated By

Action Request Assignment Completion Approval

Route List : 001

Route List Initiator : I18938

<u>Passport</u>	<u>Fac</u>	<u>Group</u>	<u>/</u>	<u>Type</u>	<u>Send</u> <u>Date</u>	<u>Send</u> <u>Time</u>	<u>Action</u> <u>Taken</u>	<u>Action</u> <u>Date</u>	<u>/</u>	<u>Time</u>	<u>Last Name</u>
EMK7353				A	09/20/2017	17:51	APPROVED	09/20/2017	17:54		KUHR
TAA7322	CN	EPSUPV		A	09/20/2017	17:54	APPROVED	09/21/2017	08:27		ARLOW

Route List : 002

Route List Initiator : I18938

<u>Passport</u>	<u>Fac</u>	<u>Group</u>	<u>/</u>	<u>Type</u>	<u>Send</u> <u>Date</u>	<u>Send</u> <u>Time</u>	<u>Action</u> <u>Taken</u>	<u>Action</u> <u>Date</u>	<u>/</u>	<u>Time</u>	<u>Last Name</u>
I44004				A	09/21/2017	10:16	APPROVED	09/21/2017	10:22		FISCHER
TAA7322	CN	EPSUPV		A	09/21/2017	10:22	APPROVED	09/21/2017	10:48		ARLOW

Action Request Assignment Cause/Action

Action Request Assignment Reference Documents

<u>Doc</u>	<u>Sub</u>	<u>Minor</u>					
<u>Facility</u>	<u>Type</u>	<u>Type</u>	<u>Document</u>	<u>Sheet</u>	<u>Rev</u>	<u>Rev</u>	<u>Title</u>

Action Request Assignment Reference Equipment

<u>Facility</u>	<u>Unit</u>	<u>System</u>	<u>Equip</u> <u>Type</u>	<u>Equip</u> <u>Number</u>	<u>Equip</u> <u>Tag</u>	<u>Equip</u> <u>Status</u>	<u>Rev</u>	<u>Rev</u> <u>Status</u>
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Duke Energy

ACTION REQUEST - 02152281

Action Request Assignment Cross References

<u>Ref</u> <u>Type</u>	<u>Ref</u> <u>Nbr</u>	<u>Ref</u> <u>Sub</u>	<u>Ref Nbr</u> <u>Type</u>	<u>Status</u>	<u>Limit</u> <u>AS Cls</u>	<u>Description</u>
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Action Request Assignment Appendices

APPENDIX 1

<< 10 CFR 50.54(q) Effectiveness Evaluation Form >>

Screening and Evaluation Number				Applicable Sites																									
EREG #: 2152281				BNP	<input type="checkbox"/>																								
				CNS	<input checked="" type="checkbox"/>																								
				CR3	<input type="checkbox"/>																								
				HNP	<input type="checkbox"/>																								
5AD #: <table border="1"><tr><td>EPA A</td><td>2151562</td><td>EPA J</td><td>2148663</td></tr><tr><td>EPA B</td><td>2148298</td><td>EPA K</td><td>2148690</td></tr><tr><td>EPA E</td><td>2147943</td><td>EPA M</td><td>2148769</td></tr><tr><td>EPA G</td><td>2148394</td><td>EPA O</td><td>2152058</td></tr><tr><td>EPA H</td><td>2152146</td><td>EPA P</td><td>2148791</td></tr><tr><td>EPA I</td><td>2148481</td><td></td><td></td></tr></table>				EPA A	2151562	EPA J	2148663	EPA B	2148298	EPA K	2148690	EPA E	2147943	EPA M	2148769	EPA G	2148394	EPA O	2152058	EPA H	2152146	EPA P	2148791	EPA I	2148481			MNS	<input type="checkbox"/>
				EPA A	2151562	EPA J	2148663																						
				EPA B	2148298	EPA K	2148690																						
				EPA E	2147943	EPA M	2148769																						
				EPA G	2148394	EPA O	2152058																						
				EPA H	2152146	EPA P	2148791																						
EPA I	2148481																												
ONS	<input type="checkbox"/>																												
RNP	<input type="checkbox"/>																												
GO	<input type="checkbox"/>																												
Document and Revision CN-ADMN-EPLAN-MANUAL, for section revision numbers see summary of changes.		Catawba Emergency Plan																											
Part I. Description of Proposed Change:																													
<p>In conjunction with the common EOF for BNP, HNP, and RNP, an initiative was undertaken by Duke Energy to standardize the augmenting ERO positions, functions and responsibilities (tasks) across the fleet. This involves changes to the current CNS augmenting ERO, based on the number of responders and their titles identified in the site emergency plan and implementing procedures. Included in the standard ERO initiative is the development of fleet standard ERO checklists, procedures and forms. Note – this initiative makes no changes to the on-shift ERO or 45 minute augmenting response positions.</p> <p>Enclosure 1 is the CNS ERO Position Comparison and Evaluation – TSC/OSC</p> <p>Enclosure 2 is the CNS ERO Position Comparison and Evaluation – JIC</p> <p>Enclosure 3 is the EOF ERO Position Comparison and Evaluation</p> <p>Enclosure 4 is the detailed summary of the Emergency Plan changes</p> <p>Enclosures are located in the CAS E-Folder.</p> <p>The following changes are outside the Fleet Standard ERO project and will be evaluated separately within this evaluation.</p> <ul style="list-style-type: none">EPA I Section I.9 - added the following at the end of the paragraph: "OR a count rate meter utilizing direct corrected count rate (ccpm) of the Silver Zeolite or equivalent cartridge cross-referenced against an estimated Iodine-131 microCi/cc concentration attachment."																													
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 <input type="checkbox"/> No <input checked="" type="checkbox"/>																								

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

Licensing Basis of the ERO

CNS Emergency Plan Revision 2 (dated January 1983), revision 97-1 (dated January 1997), and revision 11-2 (dated September 2011) reflect the NRC approved versions related to the augmenting ERO. The augmenting ERO documented in the current CNS E-Plan, Revision 162, bounds the NRC approved E-Plan augmenting ERO and is used as the basis for the detailed comparison and evaluation provided in Enclosures 2, 3, and 4.

List Commitments Associated with the Change

A search to identify site specific commitments related to the ERO positions and their assigned responsibilities was performed. No site specific commitments were identified aside from those in the Emergency Plan.

The differences in approved revisions and the current revisions of the Emergency Plans have been reviewed, and they have been determined to meet the regulatory requirements required during the course of revisions. Each revision has been reviewed by the NRC during the inspection process.

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):

The changes resulting from the adoption of the standard ERO establish a closer relationship between risk significant / key functions and the positions assigned those functions. The objective of the changes is to ensure that those functions and their processes are linked directly to the augmented minimum staffing positions to allow for optimum relief of on shift personnel and less complicated response execution following facility activation.

Refer to Enclosures 1, 2, and 3 for a detailed review of the differences between the current CNS augmenting ERO and the standard augmenting ERO, and the evaluation of those changes from the organizational hierarchy, position and response, and task-by-task levels.

The adoption of the standard augmenting ERO into the CNS Emergency Plan: (1) provides a response organization defined by specific structure and responsibilities, which is consistent with regulations and industry guidance, and (2) maintains an efficient augmentation capability for both minimum staffing and full staffing positions.

The adoption of the standard augmenting ERO into the CNS Emergency Plan does not alter the licensing basis and continues to meet the regulatory requirements of 10CFR50.47(b)(1), (b)(2), (b)(7), and 10CFR50 Appendix E, Section IV.A. This change does not alter, add or remove previous site specific commitments with regards to the augmenting ERO.

The Section I revision includes a description on the use of a frisker to measure radioiodine concentrations in addition to the method in the current Emergency Plan. There will continue to be adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition as required by 10 CFR 50.47(b)(9) and Appendix E to 10 CFR Part 50, IV.E.2.

The adoption of a fleet standard recovery organization and plan into the CNS Emergency Plan provides a flexible recovery organization based on the complexity of the event or recovery plan. This new recovery organization and plan is based on the current recovery organization and plan in place at HNP, which has been evaluated in drills and

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exercises. The adoption of a fleet standard recovery organization into the CNS Emergency Plan does not alter the licensing basis and continues to meet the regulatory requirements of 10CFR50.47(b)(13). This change does not alter, add or remove previous site specific commitments with regards to the recovery organization and plan.

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):

1. The following portion of planning standard §50.47(b)(1) is related to the change in adopting the standard augmenting ERO.
- Primary responsibilities for emergency response by the nuclear facility licensee have been assigned, and each principal response organization has staff to augment its initial response on a continuous basis.*

The functions for §50.47(b)(1) related to this change are:

- a. *Responsibility for emergency response is assigned.*
- b. *The response organization has the staff to respond and augment on a continuing basis (24/7 staffing) in accordance with the E-plan.*

The NUREG-0654 Part II.A elements for §50.47(b)(1) related to this change are:

- A.1.d. *Each organization shall identify a specific individual by title who shall be in charge of the emergency response.*
- A.2. *Each principal organization shall be capable of continuous (24-hour) operations for a protracted period. The individual in the principal organization who will be responsible for assuring continuity of resources (technical, administrative, and material) shall be specified by title.*

2. The following portion of planning standard §50.47(b)(2) is related to the change in adopting the standard augmenting ERO.
- ..., timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.*

The function for §50.47(b)(2) related to this change is:

- b. *The process for timely augmentation of on shift staff is established and maintained.*

The NUREG-0654 Part II.B elements for §50.47(b)(2) related to this change are:

- B.3. *Each licensee shall identify a line of succession for the emergency coordinator position and identify the specific conditions for higher level utility officials assuming this function.*
- B.4. *Each licensee shall establish the functional responsibilities assigned to the emergency coordinator and shall clearly specify which responsibilities may not be delegated to other elements of the emergency organization. Among the responsibilities which may not be delegated shall be the decision to notify and to recommend protective actions to authorities responsible for offsite emergency measures.*
- B.5. *Each licensee shall specify the positions or title and major tasks to be performed by the persons to be assigned to the functional areas of emergency activity. For emergency situations, specific assignments shall be made for all shifts and for plant staff members, both onsite and away from the site. These assignments shall cover the emergency functions in Table B-1 entitled, "Minimum Staffing Requirements for Nuclear Power Plant Emergencies." The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency. This capability shall be as indicated in Table B-1.*

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B.7. Each licensee shall specify the corporate management, administrative, and technical support personnel who will augment the plant staff as specified in the table entitled "Minimum Staffing Requirements for Nuclear Power Plant Emergencies," (Table B-1)

3. The following portions of §50 Appendix E, Section IV.A are related to the change in adopting the standard augmenting ERO.

The organization for coping with radiological emergencies shall be described, including definition of authorities, responsibilities, and duties of individuals assigned to the licensee's emergency organization and the means for notification of such individuals in the event of an emergency. Specifically, the following shall be included:

- 2. A description of the onsite emergency response organization (ERO) with a detailed discussion of:*
 - a. Authorities, responsibilities, and duties of the individual(s) who will take charge during an emergency;*
 - b. Plant staff emergency assignments;*
 - c. Authorities, responsibilities, and duties of an onsite emergency coordinator who shall be in charge of the exchange of information with offsite authorities responsible for coordinating and implementing offsite emergency measures.*
- 3. A description, by position and function to be performed, of the licensee's headquarters personnel who will be sent to the plant site to augment the onsite emergency organization.*
- 4. Identification, by position and function to be performed, of persons within the licensee organization who will be responsible for making offsite dose projections, ...*

4. The following portion of planning standard §50.47(b)(7) is related to the change in adopting the standard augmenting ERO.

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

The function for §50.47(b)(7) related to this change are:

- a. Coordinated dissemination of public information during emergencies is established.*

The NUREG-0654 Part II.G elements for §50.47(b)(5) related to this change are:

G.4.a Each principal organization shall designate a spokesperson who should have access to all necessary information.

5. The following portion of planning standard §50.47(b)(9) is associated with the addition of a frisker for measuring radioiodine concentrations.

Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

The function for §50.47(b)(9) related to this change are:

- a. Methods, systems, and equipment for assessment of radioactive releases are in use.*

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The NUREG-0654 Part II.I elements for §50.47(b)(9) related to this change are:

I. 7 Each organization shall describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone which are an intrinsic part of the concept of operations for the facility.

I.8 Each organization, where appropriate, shall provide methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways. This shall include activation, notification means, field team composition, transportation, communication, monitoring equipment and estimated deployment times.

I.9 Each organization shall have a capability to detect and measure radioiodine concentrations in air in the plume exposure EPZ as low as 10⁻⁷ uci/cc (microcuries per cubic centimeter) under field conditions. Interference from the presence of noble gas and background radiation shall not decrease the stated minimum detectable activity.

6. The following portion of planning standard §50.47(b)(13) is associated with the change in adopting the standard recovery organization and plan.

General plans for recovery and reentry are developed.

The function for §50.47(b)(13) related to this change are:

- a. *Plans for recovery and reentry are developed.*

The NUREG-0654 Part II.M elements for §50.47(b)(13) related to this change are:

M.1 Each organization, as appropriate, shall develop general plans and procedures for reentry and recovery and describe the means by which decisions to relax protective measures (e.g., allow reentry into an evacuated area) are reached. This process should consider both existing and potential conditions.

M.2 Each licensee plan shall contain the position/title, authority and responsibilities of individuals who will fill key positions in the facility recovery organization. This organization shall include technical personnel with responsibilities to develop, evaluate and direct recovery and reentry operations.

M.3 Each licensee and State plan shall specify means for informing members of the response organizations that a recovery operation is to be initiated, and of any changes in the organizational structure that may occur.

M.4 Each plan shall establish a method for periodically estimating total population exposure.

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

There is no numeric change to the CNS augmenting ERO. Refer to Enclosures 1, 2, and 3 for a detailed review of the differences between the current CNS augmenting ERO and the standard augmenting ERO, and the evaluation of those changes.

1. Capability Assessment

All emergency response related functions and tasks performed by the current CNS augmenting ERO have been dispositioned against the standard ERO positions as documented in Enclosures 1, 2 and 3. Changes to ERO task assignments categorized as deviations were evaluated and determined not to degrade the capability to perform their particular function.

Additionally, all ERO tasks for each position have been formally defined, indexed to their corresponding planning standard, and listed in the Emergency Plan Implementing Procedures for Emergency Response Facility activation. These tasks can now be readily adopted into the ERO systematic approach to training based qualification process and easily associated with the drill and exercise evaluation performance objectives and demonstration criteria. Thus, the capability to determine performance vs. process issues and feedback to training of task level items is significantly improved.

2. Timeliness Assessment

The standard augmenting ERO, with minor modification, is based on the current augmenting ERO in place at CNS, MNS and ONS which has been evaluated in numerous drills and exercises. There are no changes to the on-shift ERO or 45 minute response positions as part of the standard augmenting ERO initiative.

The aspect of timeliness with regard to the ability of any position to perform their assigned responsibilities was further evaluated by a review of the impact of any new tasks assigned to a position by a process similar to that used in the on-shift staffing study task analysis. It was assumed there was no timeliness impact for positions that were not assigned new tasks or were only assigned new tasks which were determined to be undocumented and were actually performed by the position. New tasks are categorized as deviations. The aspects of overburden and overlap were considered in the determination of whether there was a potential adverse impact on timeliness to any assigned task. No position was identified with task overburden or overlap with regard to the addition of any responsibilities.

Based on the above, the adoption of the standard augmenting ERO will continue to maintain or improve the capability and timeliness of the CNS augmenting ERO to respond to an event and effectively perform their assigned tasks.

The Section I change to use a frisker to measure radioiodine concentrations in addition to the method in the current Emergency Plan is an enhancement. The change provides additional assurance that methods, systems, and equipment for assessment of radioactive releases are in use.

The adoption of a fleet standard recovery organization and plan ensures the Corporate EOF can be a part of the site recovery organization if needed. The standard recovery organization and plan continues to ensure plans for recovery and reentry are developed.

The changes described do not affect the emergency planning functions because the changes continue to ensure:

- Responsibilities for emergency response are assigned
- The response organization has the staff to respond and augment on a continuing basis (24/7 staffing) in accordance with the E-plan
- The process for timely augmentation of on shift staff is established and maintained
- Coordinated dissemination of public information during emergencies is established

<< 10 CFR 50.54(q) Effectiveness Evaluation Form >>

- Methods, systems, and equipment for assessment of radioactive releases are in use
- Plans for recovery and reentry are developed.

The changes described provide additional assurance that the normal plant operating organization and ERO has the ability and capability to:

- respond to an emergency;
- perform functions in a timely manner;
- effectively identify and take measures to ensure protection of the public health and safety; and
- effectively use response equipment and emergency response procedures.

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2	Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
3	Does the proposed change maintain the current Emergency Action Level (EAL) scheme?	Yes <input checked="" type="checkbox"/>	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.	<input checked="" type="checkbox"/>	
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"/>
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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: _____.

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 3

ATTACHMENT 5

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<< 10 CFR 50.54(q) Effectiveness Evaluation Form >>

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): Matthew Nelson	Preparer Signature: See CAS	Date: See CAS
Reviewer Name (Print): See CAS	Reviewer Signature: See CAS	Date: See CAS
Approver (EP Manager) Name (Print): See CAS	Approver Signature: See CAS	Date: See CAS
Approver (CFAM, as required) Name (Print): N/A	Approver Signature: N/A	Date: N/A
<p>If the proposed activity is a change to the E-Plan or implementing procedures, then create two EREG General Assignments.</p> <p>If required by Section 5.5, Submitting Reports of Changes to the NRC, then create two EREG General Assignments.</p> <ul style="list-style-type: none"> 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. ■ 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. ■ 		

QA RECORD



Duke Energy

ACTION REQUEST - 02152281

Action Request Assignment Details

ASSIGNMENT NUMBER : 04 SUB :

Type	: GNRL	Due Date	: 10/12/2017	Pri Resp Fac	:
Status	: ACC/ASG	Reschedule	:	Pri Resp Group	:
Assigned To	: STACI N FISCHER			Sec Resp Fac	:
Subject	: PROVIDE 50.54(Q) INFO TO LICENSING FOR NRC 30 DAY SUBMITTAL			Sec Resp Group	:
Aff Facility	: CN	Unit	:	System	:
UCR	:	Schedule Ref	:		
Organization	:	Department	: 13650	Discipline	:
Est Manhrs	:	Ext Comp Date	:		

Description

THE REGULATION AT 10 CFR 50.54(Q)(5) REQUIRES THE LICENSEE TO SUBMIT, AS SPECIFIED IN 10 CFR 50.4(B)(5)(II), A REPORT OF EACH CHANGE TO THE EMERGENCY PLAN MADE WITHOUT PRIOR NRC APPROVAL, INCLUDING A SUMMARY OF ITS ANALYSIS, WITHIN 30 DAYS AFTER THE CHANGE IS PUT IN EFFECT. THE NRC HAS STATED THAT THE SUMMARY REPORT OR A FULL COPY OF THE COMPLETED 50.54(Q) MAY BE SUBMITTED TO SATISFY THIS REQUIREMENT. SUBMIT TO LICENSING, A SUMMARY, AS DESCRIBED IN AD-EP-ALL- 0602, OR THE FULL 50.54(Q) REVIEWING ALL CHANGES TO THE EMERGENCY PLAN MADE WITHOUT PRIOR NRC APPROVAL FOR SUBMITTAL TO THE NRC'S DOCUMENT CONTROL DESK, WITH A COPY TO THE APPROPRIATE REGIONAL OFFICE, AND A COPY TO THE APPROPRIATE NRC RESIDENT INSPECTOR. IF THE COMMUNICATION IS ON PAPER, THE SUBMISSION TO THE DOCUMENT CONTROL DESK MUST BE THE SIGNED ORIGINAL.

Action Request Assignment Completion Notes

Action Request Assignment Status History

<u>Updated Date</u>	<u>Updated By</u>	<u>Assgn Status</u>	<u>Assgn Due Date</u>
09/20/2017	I18938	INPROG	
09/20/2017	I18938		10/12/2017
09/20/2017	I18938	NTFY/ASG	
09/20/2017	I44004	ACC/ASG	



Duke Energy

ACTION REQUEST - 02152281

Action Request Assignment Attributes

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
1A COMMITTED		N	

Name :

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
1B CHANGE BASIS		N	

Name :

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
2A COMMENTS		N	

Name :

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
BENEFIT REALIZED		N	

Name :

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
FINAL ISSUE		N	

Name :

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
IMPORTANT TO NRC		N	

Name :

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
IT LABOR ESTIMATE		N	

Name :

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
LTAM ISSUE ID		N	

Name :



Duke Energy

ACTION REQUEST - 02152281

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
PHC DUE DATE		N	
Name :			

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
PLANT HEALTH ISSUE ?		N	
Name :			

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
T+1 CRITIQUE		N	
Name :			

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
WBS		N	
Name :			

Action Request Assignment Routing/Return Comments

<u>Routing Comments from the X601 Panel</u>	<u>Updated On</u>	<u>Updated By</u>
*** No Routing Comments Found ***		

<u>Routing Comments from the X602 Panel</u>	<u>Updated On</u>	<u>Updated By</u>
*** No Return Comments Found ***		

Action Request Assignment Completion Approval

Action Request Assignment Cause/Action

Action Request Assignment Reference Documents

<u>Facility</u>	<u>Doc</u> <u>Type</u>	<u>Sub</u> <u>Type</u>	<u>Document</u>	<u>Sheet</u>	<u>Rev</u>	<u>Minor</u> <u>Rev</u>	<u>Title</u>
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Duke Energy

ACTION REQUEST - 02152281

Action Request Assignment Reference Equipment

<u>Facility</u>	<u>Unit</u>	<u>System</u>	<u>Equip Type</u>	<u>Equip Number</u>	<u>Equip Tag</u>	<u>Equip Status</u>	<u>Rev</u>	<u>Rev Status</u>
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Action Request Assignment Cross References

<u>Ref Type</u>	<u>Ref Nbr</u>	<u>Ref Sub</u>	<u>Ref Type</u>	<u>Ref Nbr</u>	<u>Status</u>	<u>Limit AS Cls</u>	<u>Description</u>
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Action Request Assignment Appendices

Action Request Assignment Details

ASSIGNMENT NUMBER : 05 SUB :

Type	: GNRL	Due Date	: 10/26/2017	Pri Resp Fac	: CN
Status	: NTFY/ASG	Reschedule	:	Pri Resp Group	: REGSUPV
Assigned To	: TONYA L LOWERY			Sec Resp Fac	:
Subject	: LICENSING SUBMIT 50.54(Q) TO NRC WITHIN 30 DAYS OF CHANGE			Sec Resp Group	:
Aff Facility	: CN	Unit	:	System	:
UCR	:	Schedule Ref	:		
Organization	:	Department	: 10410	Discipline	:
Est Manhrs	:	Ext Comp Date	:		

Description

THE REGULATION AT 10 CFR 50.54(Q)(5) REQUIRES THE LICENSEE TO SUBMIT, AS SPECIFIED IN 10 CFR 50.4(B)(5)(II), A REPORT OF EACH CHANGE TO THE EMERGENCY PLAN MADE WITHOUT PRIOR NRC APPROVAL, INCLUDING A SUMMARY OF ITS ANALYSIS, WITHIN 30 DAYS AFTER THE CHANGE IS PUT IN EFFECT. THE NRC HAS STATED THAT THE SUMMARY REPORT OR A FULL COPY OF THE COMPLETED 50.54(Q) MAY BE SUBMITTED TO SATISFY THIS REQUIREMENT. SUBMIT, WITHIN 30 DAYS OF IMPLEMENTING THE CHANGE, THE FULL 50.54(Q) OR SUMMARY (AS DESCRIBED IN AD-EP-ALL-0602) FOR ALL CHANGES TO THE EMERGENCY PLAN MADE WITHOUT PRIOR NRC APPROVAL TO THE NRC'S DOCUMENT CONTROL DESK, WITH A COPY TO THE APPROPRIATE REGIONAL OFFICE, AND A COPY TO THE APPROPRIATE NRC RESIDENT INSPECTOR. IF THE COMMUNICATION IS ON PAPER, THE SUBMISSION TO THE DOCUMENT CONTROL DESK MUST BE THE SIGNED ORIGINAL.



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ACTION REQUEST - 02152281

Action Request Assignment Completion Notes

Action Request Assignment Status History

<u>Updated Date</u>	<u>Updated By</u>	<u>Assgn Status</u>	<u>Assgn Due Date</u>
09/20/2017	I18938	INPROG	
09/20/2017	I18938		10/26/2017
09/20/2017	I18938	NTFY/PRI	
09/21/2017	CAFLETC	ACC/PRI	
09/21/2017	CAFLETC	NTFY/ASG	

Action Request Assignment Attributes

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
1A COMMITTED		N	
Name :			

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
1B CHANGE BASIS		N	
Name :			

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
2A COMMENTS		N	
Name :			

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
BENEFIT REALIZED		N	
Name :			

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
FINAL ISSUE		N	
Name :			



Duke Energy

ACTION REQUEST - 02152281

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
IMPORTANT TO NRC		N	
Name :			

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
IT LABOR ESTIMATE		N	
Name :			

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
LTAM ISSUE ID		N	
Name :			

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
PHC DUE DATE		N	
Name :			

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
PLANT HEALTH ISSUE ?		N	
Name :			

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
T+1 CRITIQUE		N	
Name :			

<u>Request Attribute</u>	<u>Values</u>	<u>Reqd</u>	<u>Date</u>
WBS		N	
Name :			

Action Request Assignment Routing/Return Comments

Routing Comments from the X601 Panel
*** No Routing Comments Found ***

Updated On Updated By

Routing Comments from the X602 Panel
*** No Return Comments Found ***

Updated On Updated By



Duke Energy

ACTION REQUEST - 02152281

Action Request Assignment Completion Approval

Action Request Assignment Cause/Action

Action Request Assignment Reference Documents

<u>Facility</u>	<u>Doc</u> <u>Type</u>	<u>Sub</u> <u>Type</u>	<u>Document</u>	<u>Sheet</u>	<u>Rev</u>	<u>Minor</u> <u>Rev</u>	<u>Title</u>
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Action Request Assignment Reference Equipment

<u>Facility</u>	<u>Unit</u>	<u>System</u>	<u>Equip</u> <u>Type</u>	<u>Equip</u> <u>Number</u>	<u>Equip</u> <u>Tag</u>	<u>Equip</u> <u>Status</u>	<u>Rev</u>	<u>Rev</u> <u>Status</u>
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Action Request Assignment Cross References

<u>Ref</u> <u>Type</u>	<u>Ref</u> <u>Nbr</u>	<u>Ref</u> <u>Sub</u>	<u>Ref Nbr</u> <u>Type</u>	<u>Status</u>	<u>Limit</u> <u>AS Cls</u>	<u>Description</u>
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Action Request Assignment Appendices

*****END OF REPORT*****

Enclosure 1

CNS ERO Position Comparison and Evaluation – TSC/OSC