

EHS&L Document

**SNM-1227 - Chapter 8
Emergency Management**

Nature of Changes

Item	Paragraph	Description	Justification
1.	Entire Document	Changed AREVA Inc. to Framatome Inc.	Company Name Change
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
List Below any Documents, including Forms & Operator Aids which must be issued concurrently with this document revision:			

This Document contains a total of 6 pages excluding the signature page.

DOCUMENT REVIEW/APPROVAL/DELETION CHECKLIST

All new and/or revised procedures shall be approved by the change author, cognizant manager(s) of areas affected by the changes, and by applicable manager(s) of any function that approved the previous revision of the document unless responsibility for such approval has been transferred to another organization. Also, the procedure shall be approved by manager(s) of functional organizations that provide technical reviews with the exception of the Training Department. Finally, Document Control shall verify that the required approvals have been properly obtained and that any documents that must be issued concurrently are ready to be issued.

Document Reviews			Document Approvals	
Purpose/Function of Review	Specify Reviewer(s) (Optional except for change author)	(Check all that apply)	Title of Approver	(Check all that Apply)
Document Control (Automatic)		<input checked="" type="checkbox"/>	Document Control (Automatic)	<input checked="" type="checkbox"/>
Change Author	CD Manning	<input checked="" type="checkbox"/>	Author	<input checked="" type="checkbox"/>
Independent Technical Review		<input type="checkbox"/>		
Operability Review(s)			Mgr, Richland Operations ⁽¹⁾	<input type="checkbox"/>
Conversion		<input type="checkbox"/>	Mgr, Uranium Conversion & Recovery Operations ⁽¹⁾	<input type="checkbox"/>
Recovery		<input type="checkbox"/>		
Ceramics		<input type="checkbox"/>	Mgr, Ceramic Operations ⁽¹⁾	<input type="checkbox"/>
Rods		<input type="checkbox"/>		
Bundles		<input type="checkbox"/>	Mgr, Rods & Bundles ⁽¹⁾	<input type="checkbox"/>
Components		<input type="checkbox"/>	Mgr, Component Fabrication ⁽¹⁾	<input type="checkbox"/>
Maintenance Review		<input type="checkbox"/>	Mgr, Maintenance ⁽¹⁾	<input type="checkbox"/>
Lab Review		<input type="checkbox"/>	Mgr, Production Support ⁽¹⁾	<input type="checkbox"/>
Transportation		<input type="checkbox"/>	Mgr, Ops Strategy & Supply Chain	<input type="checkbox"/>
EHS&L Review(s)			Mgr, EHS&L ⁽²⁾	<input checked="" type="checkbox"/>
Criticality		<input type="checkbox"/>		
Radiation Protection		<input type="checkbox"/>	Mgr, Nuclear Safety ⁽²⁾	<input type="checkbox"/>
Safety		<input type="checkbox"/>	Mgr, Safety ⁽²⁾	<input type="checkbox"/>
Security/Emergency Prep.	JM Deist	<input checked="" type="checkbox"/>	Mgr, Security & Emergency Preparedness ⁽²⁾	<input type="checkbox"/>
Fire Safety		<input type="checkbox"/>		
MC&A	CD Manning	<input checked="" type="checkbox"/>		
Transportation		<input type="checkbox"/>	Mgr, Licensing & Compliance ⁽²⁾	<input type="checkbox"/>
Environmental		<input type="checkbox"/>		
Mechanics Richland Review		<input type="checkbox"/>	Mgr, Mechanics Richland	<input type="checkbox"/>
Mechanics Lynchburg Review		<input type="checkbox"/>		
Thermal-Hydraulics Richland Review		<input type="checkbox"/>	Mgr, Thermal-Hydraulics Richland	<input type="checkbox"/>
Thermal-Mechanics Richland Review		<input type="checkbox"/>	Mgr, Materials & Therm-Mechs	<input type="checkbox"/>
Project & Reliability Review		<input type="checkbox"/>	Mgr, Project & Reliability Eng.	<input type="checkbox"/>
Quality Review		<input type="checkbox"/>	Mgr, Richland Site Quality	<input type="checkbox"/>
Purchasing Review		<input type="checkbox"/>	Mgr, PP&CPC	<input type="checkbox"/>
Others:		<input type="checkbox"/>	Mgr, Richland Site/Other	<input type="checkbox"/>
Document Control		<input type="checkbox"/>	Richland Records Management	<input type="checkbox"/>
Training & Employee Dev.: ⁽³⁾		<input type="checkbox"/>	Training & Employee Dev.	<input type="checkbox"/>

⁽¹⁾Note: If approvals include 2 or more product center managers, the Operations manager can be substituted for the applicable product center managers.

⁽²⁾Note: If approvals include 2 or more EHS&L functional managers, the EHS&L manager can be substituted for the applicable EHS&L functional managers.

⁽³⁾Note: Training department review is required for all procedures that require or affect a Learning Plan and if additional training materials or curriculum must be revised before issuing procedure.

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EHS&L CHANGE IMPACT EVALUATION FORM						
<p>The scope and content of this document have been determined by EHS&L to not impact the safety disciplines checked below. Future revisions do not require review by those EHS&L component(s) unless the scope changes such that a previously excluded safety discipline may be impacted.</p> <p> <input type="checkbox"/> Criticality <input type="checkbox"/> Radiation Protection <input type="checkbox"/> Safety/Security <input type="checkbox"/> Emergency Preparedness <input type="checkbox"/> MC&A <input type="checkbox"/> Transportation <input type="checkbox"/> Environmental </p>						
DOCUMENT VERSION:	EHS&L REVIEW COMPONENT:	EVALUATION DATE:	CHANGE EVALUATOR*:			
			2ND PARTY APPROVAL*:			
<p>The scope and content of this document have been determined by EHS&L to not directly impact the safe handling of licensed materials (enriched uranium). Future revisions to this document do not require the 10CFR 70.72 change evaluation unless the scope of the document changes such that it directly impacts the handling of licensed materials.</p>						<input type="checkbox"/>
DOCUMENT / ECN No**:		EVALUATION DATE:		CHANGE EVALUATOR:		
E10-08-008		1/19/18		CD Manning		
Does the change potentially impact Criticality Alarm System (CAS) coverage?						<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
EVALUATION OF NRC PRE-APPROVAL:						
IS NRC PRE-APPROVAL (LICENSE AMENDMENT) NEEDED? ➤ Based on "YES" answer to any of five questions below. ➤ Based on "NO" answer to all five questions below.						<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
1. Does the change create new types of accident sequences that, unless mitigated or prevented, would exceed the performance requirements of 10 CFR 70.61 (create high or intermediate consequence events) and that have not previously been described in Framatome's ISA Summary?						<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Does the change use new processes, technologies, or control systems for which Framatome has no prior experience?						<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. Does the change remove, without at least an equivalent replacement of the safety function an item relied on for safety (IROFS) that is listed in the ISA Summary?						<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. Does the change alter any item relied on for safety, listed in the ISA Summary, that is the sole item preventing or mitigating an accident sequence of high or intermediate consequences?						<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. Does the change qualify as a change specifically prohibited by NRC regulation, order or license condition?						<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Evaluation of Actions Required PRIOR TO OR CONCURRENT with Change Implementation:						
6. Modification / Addition to CAS system or system coverage documentation						<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
7. Acquire NRC pre-approval (LICENSE AMENDMENT)						<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
8. Conduct/modify ISA						<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
9. Modify / update the following:	<input checked="" type="checkbox"/> None <input type="checkbox"/> Other	<input type="checkbox"/> ISA Database <input type="checkbox"/> Red-Line Drawings/P&ID	<input type="checkbox"/> NCSA <input type="checkbox"/> NCSS	<input type="checkbox"/> NCSP <input type="checkbox"/> PHA	<input type="checkbox"/> RHA <input type="checkbox"/> FHA	<input type="checkbox"/> ChHA <input type="checkbox"/> Procedures
Evaluation of Actions Required SUBSEQUENT TO Change Implementation:						
10. Modify / update the following:	<input checked="" type="checkbox"/> None <input type="checkbox"/> Other	<input type="checkbox"/> ISA Database <input type="checkbox"/> AS-Built Drawings/P&ID	<input type="checkbox"/> NCSA <input type="checkbox"/> NCSS	<input type="checkbox"/> NCSP <input type="checkbox"/> PHA	<input type="checkbox"/> RHA <input type="checkbox"/> FHA	<input type="checkbox"/> ChHA <input type="checkbox"/> Procedures
Justification Section for "YES" preceding Questions 1 – 8 or other for 9, 10: Being prepared as part of a License Amendment, however pre-approval of the amendment prior to issuing is not required.						

(*) Only required if one or more of the boxes to exclude a particular safety discipline review is checked.

(**) If this form exists as a part of a document, the document number is not required.

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EHS&L CHANGE IMPACT EVALUATION FORM

~~The scope and content of this document have been determined by EHS&L to not impact the safety disciplines checked below. Future revisions do not require review by those EHS&L component(s) unless the scope changes such that a previously excluded safety discipline may be impacted.~~

~~☐ Criticality ☐ Radiation Protection ☐ Safety/Security ☐ Emergency Preparedness ☐ MC&A ☐ Transportation ☐ Environmental~~

DOCUMENT VERSION:

EHS&L REVIEW COMPONENT:

EVALUATION DATE:

CHANGE EVALUATOR*:

2ND PARTY APPROVAL*:

~~The scope and content of this document have been determined by EHS&L to not directly impact the safe handling of licensed materials (enriched uranium). Future revisions to this document do not require the 10CFR 70.72 change evaluation unless the scope of the document changes such that it directly impacts the handling of licensed materials.~~



DOCUMENT / ECN No:**

EVALUATION DATE:

CHANGE EVALUATOR:

~~Does the change potentially impact Criticality Alarm System (CAS) coverage?~~

~~☐ Yes ☐ No~~

EVALUATION OF NRC PRE-APPROVAL:

IS NRC PRE-APPROVAL (LICENSE AMENDMENT) NEEDED?

- ~~➤ Based on "YES" answer to any of five questions below.
➤ Based on "NO" answer to all five questions below.~~

~~☐ Yes ☐ No~~

~~1. Does the change create new types of accident sequences that, unless mitigated or prevented, would exceed the performance requirements of 10 CFR 70.61 (create high or intermediate consequence events) and that have not previously been described in Framatome's ISA Summary?~~

~~☐ Yes ☐ No~~

~~2. Does the change use new processes, technologies, or control systems for which Framatome has no prior experience?~~

~~☐ Yes ☐ No~~

~~3. Does the change remove, without at least an equivalent replacement of the safety function an item relied on for safety (IROFS) that is listed in the ISA Summary?~~

~~☐ Yes ☐ No~~

~~4. Does the change alter any item relied on for safety, listed in the ISA Summary, that is the sole item preventing or mitigating an accident sequence of high or intermediate consequences?~~

~~☐ Yes ☐ No~~

~~5. Does the change qualify as a change specifically prohibited by NRC regulation, order or license condition?~~

~~☐ Yes ☐ No~~

Evaluation of Actions Required PRIOR TO OR CONCURRENT with Change Implementation:

~~6. Modification / Addition to CAS system or system coverage documentation~~

~~☐ Yes ☐ No~~

~~7. Acquire NRC pre-approval (LICENSE AMENDMENT)~~

~~☐ Yes ☐ No~~

~~8. Conduct/modify ISA~~

~~☐ Yes ☐ No~~

~~9. Modify /
update the
following:~~

~~☐ None
☐ Other~~

~~☐ ISA Database
☐ Red-Line Drawings/P&ID~~

~~☐ NCSA
☐ NCSS~~

~~☐ NCSP
☐ PHA~~

~~☐ RHA
☐ FHA~~

~~☐ ChHA
☐ Procedures~~

Evaluation of Actions Required SUBSEQUENT TO Change Implementation:

~~10. Modify /
update the
following:~~

~~☐ None
☐ Other~~

~~☐ ISA Database
☐ AS-Built Drawings/P&ID~~

~~☐ NCSA
☐ NCSS~~

~~☐ NCSP
☐ PHA~~

~~☐ RHA
☐ FHA~~

~~☐ ChHA
☐ Procedures~~

~~Justification Section for "YES" preceding Questions 1—8 or other for 9, 10:~~

(*) — Only required if one or more of the boxes to exclude a particular safety discipline review is checked.

(**) — If this form exists as a part of a document, the document number is not required.

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8.0 **Emergency Management**

8.1 ***Emergency Plan***

Framatome Inc. (Framatome) has and will maintain an emergency plan (E08-01-1.0, Version 3.0, or as subsequently revised) for its Richland fuel fabrication facility in accordance with the requirements of 10 CFR 70.22(i). Content of the plan is in accordance with 10 CFR 70.22(i)(3) and considers U.S. Nuclear Regulatory Commission (NRC) guidance in Regulatory Guide 3.67, "Standard Format and Content for Emergency Plans for Fuel Cycle and Materials Facilities."

8.2 ***Emergency Plan Implementing Procedures***

Framatome has developed and will maintain approved written procedures to assure effective implementation of its facility emergency plan.

8.3 ***Amendment of the Emergency Plan***

In accordance with 10 CFR 70.32(i), Framatome will not implement changes to the plan that decrease its effectiveness without prior application to, and prior approval by, the NRC. Changes that do not decrease the effectiveness of the plan may be made without NRC approval. Copies of such changes will be provided to the NRC and appropriate organizations within six months of making the changes, in accordance with 10 CFR 70.32(i).

8.4 ***Agreements with Offsite Emergency Response Resources***

Framatome has established and maintains formal written agreements with appropriate offsite emergency response organizations (fire, police, medical, etc.) as needed to assure implementation of its emergency plan and associated response procedures. These agreements are reviewed and renewed as appropriate and maintained on file at the Richland site.