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Serial: RA-19-0204  
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10 CFR 50.54(q)

United States Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

H.B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261 / RENEWED LICENSE NO. DPR-23

**SUBJECT: Emergency Plan PLP-007, Revision 91**

Ladies and Gentlemen:

In accordance with 10 CFR 50.54(q), Duke Energy Progress, LLC is submitting a revision summary for H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Emergency Plan PLP-007, Revision 91, which is effective April 04, 2019.

In accordance with 10 CFR 50.54(q)(5), Attachments I and II include a summary of analyses associated with the emergency plan changes.

This document contains no new Regulatory Commitments.

Should you have any questions concerning this letter, or require additional information, please contact Art Zaremba, Director – Nuclear Fleet Licensing, at 980-373-2062.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Nolan", written over a horizontal line.

M. Christopher Nolan  
Vice President, Nuclear Regulatory Affairs, Policy & Emergency Preparedness

Attachment I: 10 CFR 50.54(q) Screening Evaluation Form  
Attachment II: 10 CFR 50.54(q) Effectiveness Evaluation Form

cc: C. Haney, NRC Regional Administrator, NRC, Region II  
J. Hammon, NRC Senior Resident Inspector, HBRSEP, Unit No. 2  
N. Jordan, NRC Project Manager, NRR

**Attachment I: 10 CFR 50.54(q) Screening Evaluation Form**

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

Screening and Evaluation Number		Applicable Sites		
EREG # 2241129		BNP	<input type="checkbox"/>	
		CNS	<input type="checkbox"/>	
		CR3	<input type="checkbox"/>	
		HNP	<input type="checkbox"/>	
5AD # 2241132		MNS	<input type="checkbox"/>	
		ONS	<input type="checkbox"/>	
		RNP	<input checked="" type="checkbox"/>	
		GO	<input type="checkbox"/>	
Document and Revision PLP-007 Rev. 91 (PRR 2197595)		Robinson 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):				
#	E-Plan or Procedure Section Reference	Current (Existing) Text	Proposed (Change) Text	Supporting Rationale (Justification) for Change
1	Cover Sheet and Headers	Revision 90	Revision 91	Editorial
2	Summary of Changes	PRR 2161598, NCR 734329, EC 407871 R000, EC 404890 R000	Summary of Changes PRR 2197595	Editorial
3	Table of Contents	N/A	Updated page numbers	Editorial
4	Throughout	Operational Support Center	Operations Support Center	PRR 2181245 Fleet Standard ERO changed the facility name. (Editorial)
5	2.50	N/A	Added reference CAPR 199340-23, Correct and Clarify Expected Response Time of ERO Personnel	PRR 2215380 Added Reference to CAPR 199340-23, Correct and Clarify Expected Response Time of ERO Personnel (Editorial)
6	Table 5.3.2-2	N/A	{2.50}	Editorial
7	5.4.3.1	<p>“Emergency Coordinator and EOF Director will fill this role.”</p> <p>“The Accident Assessment</p>	<p>“TSC Emergency Coordinator will fill this role.”</p>	<p>This change moves the responsibilities from EOF personnel to TSC personnel. The EOF was</p>

		Team, Plant Operations Director, and Technical Analysis Director will fill this role”  “The Technical Analysis Manager is not included in the above categories but is provided high level overview training to assist the ERM”	“The TSC Operations and Engineering Manager will fill this role”  Deleted	moved to Charlotte these responsibilities will stay at RNP.
8	2.43, Table 5.3.2-1 Note 5	NEI 10-05 On-Shift Staffing Analysis for H.B. Robinson Nuclear Plant-2015	NEI 10-05 On-Shift Staffing Analysis for H.B. Robinson Nuclear Plant	There is a more recent analysis than 2015 (PRR 2211282) Editorial
9	4.1.29	Remove the underline extending into the sentence	Deleted	Editorial
10	5.3.1.1 second paragraph	“personnel’ primary”	“personnel primary”	Deleted apostrophe. Editorial
11	5.1.3.1.b second paragraph	Health Physics	Radiation Protection	Editorial
12	5.3.2 third paragraph	“The emergency response organization is shown in Figure 5.3.2-1, Technical Support center ERO, Figure 5.3.2-2, Operations Support Center ERO, Figure 5.3.2-3, Emergency Operations Facility ERO, and Figure 5.3.2-4, joint Information Center ERO.”	Deleted	The same information is in second paragraph. (Editorial)
13	5.3.2.1.a first bullet	“Coordinate response activities with offsite response agencies (EM, ICP, Field Mon, etc.)”	“Coordinate response activities with offsite response agencies (Emergency Management, Incident Command Post, Field Monitoring, etc.)”	Defined abbreviations as follows per AD-EP-ALL-0103 (Editorial)
14	5.3.2.2.a	“Coordinate response activities with offsite response agencies (EM, ICP, Field Mon, etc.)”	“Coordinate response activities with offsite response agencies (Emergency Management, Incident Command Post, Field Monitoring, etc.)”	Defined abbreviations as follows per AD-EP-ALL-0103 (Editorial)
15	5.3.2.2.e	“The State and County Liaisons are staffed by site personnel and report to the Emergency Planner.”	“The State and County Liaison report to the Emergency Planner”	Clarified statement
16	Figure 5.3.2-2		Added “[Note 2] to Operations Supervisor	Note added to identify position as

			position and added "(2)" to the Mech Tech 75 min.	Shift personnel and "(2)" added to identify that 2 personnel are required. (Editorial)
17	Figure 5.3.2-4		Added "[Note 2] to the Information Gathering Lead, Tech Liaison (EOF) and News Writer (EOF) positions	Noted added to identify position as a corporate support position. (Editorial)
18	Table 5.3.2.4		Corrected table format on second page to allow it to be viewable.	Corrected formatting. (Editorial)
19	5.3.2.4	"new conferences"	"news conferences"	Correct typo. (Editorial)
20	5.3.2.4. a	"Company Spokesperson (Near Site/Corporate JIC)"	"Company Spokesperson (Near Site JIC)"	Revised to add clarity to the specific location. Administrative
21	5.3.2.4. b	"Information Gathering Lead (Near Site JIC)"	"Information Gathering Lead (Corporate JIC)"	Revised to add clarity to the specific location. Administrative
22	5.3.2.4. c	"Media Monitor (Corporate JIC)"	"Media Monitor (Near Site JIC)"	Revised to add clarity to the specific location. Administrative
23	5.3.2.4. d	"JIC Technical Liaison (Corporate JIC)"	"JIC Technical Liaison (Near Site JIC)"	Revised to add clarity to the specific location. Administrative
24	5.3.2.4. g	"Media Center Coordinator (Media Center)"	"Media Center Coordinator (Near Site JIC)"	Revised to add clarity to the specific location. Administrative
25	Figure 5.3.5-1	"Control Room Shift Manager"	"Emergency Coordinator"	Title updated to be consistent with the other figures. (Editorial)
26	Table 5.3.5-1 Note d	"Communications link between mobile and fixed medical support facilities is by radio and beepers."	"Communications link between mobile and fixed medical support facilities is by radio or other mobile communications devices. "	This change is made to include all mobile devices and technological changes.
27	5.4.2.5 Second sentence	"This function will be activated by the Control Room Staff within an hour of the declaration	"The Control Room Staff will ensure that this function will be activated within one hour	Sentence revised to provide clarification

		of an Alert or higher."	of the declaration of an Alert or higher."	on the expected action. The intent or expected actions have not changed. (Editorial)
28	5.4.4.2. b	"EPSPA-04, Access Control"	"AD-EP-ALL-0105, Activation and Operation of the Technical Support Center"	Procedure was superseded. Updated with current procedure. (Editorial)
29	5.5 Second Bullet	"SCEMD Local Government Radio"	Deleted	The LGR has been out of service for an extended period (2015), there are other methods of communication for emergencies. LGR is not credit for any EAL calls.
30	5.6.1.1 last sentence	"EPPRO-01, Program and Responsibilities"	"AD-EP-ALL-1000, Conduct of Emergency Preparedness"	Procedure was superseded. Updated with current procedure. (Editorial)
31	5.6.1.2.b	"Every sixth year, the exercise will be expanded to involve the federal response organizations in addition to the state and local organizations."	"Every eighth year, the exercise will be expanded to involve the federal response organizations in addition to the state and local organizations."	Change to support regulatory changes outlined in NUREG-0654/FEMA-REP-1, Supplement 4 and Program Manual Radiological Emergency Preparedness.
32	5.6.1.2. b	"EPPRO-01"	"AD-EP-ALL-0803"	EPPRO-01 was superseded. (Editorial)
33	5.6.1.2.6.b	"Manager Emergency Planning"	"Support Services Manager"	Title change impacted by the reorganization. (Editorial) (PRR2245707, NTM 2242299)
34	Attachment 6.7 Section 5.3	N/A	Added reference "AD-EP-ALL- 0100, Emergency Response Organization (ERO)".	This procedure defines how the planning standard for the ERO is managed. (Editorial) (PRR 2253538)
35	Attachment 6.7 Section 5.4	"EPPRO-01, Program and Responsibilities"	Deleted	EPCLA-01 & AD-EP-ALL-0100 contain emergency

				measures and are already listed. (Editorial)
36	Attachment 6.7 Section 5.6	"EPPRO-01, Program and Responsibilities"	"AD-EP-ALL-1000, Conduct of Emergency Preparedness"	EPPRO-01 has been superseded these planning standards for maintaining Emergency Preparedness are contained in AD-EP-ALL-1000. (Editorial)
37	5.3.2.3. d	<p>d. Operations Supervisor The Operations Supervisor reports to the OSC Manager. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Manage assigned group emergency response activities</li> <li>• Develop requests and coordinate external assistance (technical, craft, admin, etc.)</li> <li>• Arrange for equipment and supply resources</li> <li>• Monitor status and information boards/displays/systems</li> <li>• Participate with OSC Team dispatch and control</li> <li>• Provide input for facility briefs and updates</li> </ul>	<p>d. Operations Supervisor The Operations Supervisor reports to the OSC Manager. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Manage assigned group emergency response activities</li> <li>• Develop requests and coordinate external assistance (technical, craft, admin, etc.)</li> <li>• Arrange for equipment and supply resources</li> <li>• Monitor status and information boards/displays/systems</li> <li>• Participate with OSC Team dispatch and control</li> <li>• Provide input for facility briefs and updates</li> <li>• Perform event detection and assessment activities</li> <li>• Perform chemical sampling and analysis</li> </ul>	Revised the following due to "Chemistry Supervisor" position being deleted from AD-EP-ALL-0106. Moved Old Step5.3.2.3.h 4 <sup>th</sup> and 5 <sup>th</sup> bullets from 'Chemistry Supervisor' to bullets 7 and 8 under "Operations Supervisor".
38	Old Step 5.3.2.3.h	<p>h. Chemistry Supervisor The Chemistry Supervisor reports to the OSC Manager. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Manage assigned group emergency response activities</li> <li>• Develop requests and coordinate external</li> </ul>	<p>Deleted "Chemistry Supervisor" position as follows: h. Chemistry Supervisor The Chemistry Supervisor reports to the OSC Manager. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Manage assigned group</li> </ul>	Revised the following due to "Chemistry Supervisor" position being deleted from AD-EP-ALL-0106. Moved Old Step5.3.2.3.h 4 <sup>th</sup> and 5 <sup>th</sup> bullets from 'Chemistry

		assistance (technical, craft, admin, etc.) • Arrange for equipment and supply resources • Perform event detection and assessment activities • Perform chemical sampling and analysis • Participate with OSC Team dispatch and control • Provide input for facility briefs and updates	emergency response activities • Develop requests and coordinate external assistance (technical, craft, admin, etc.) • Arrange for equipment and supply resources • Participate with OSC Team dispatch and control • Provide input for facility briefs and updates	Supervisor” to bullets 7 and 8 under “Operations Supervisor
39	Figure 5.3.2-2	Deleted “Chemistry Supervisor”	Moved blocks for “Chemistry Tech 75 min [Note 1] and Chemistry Tech [Note 2]” from Chemistry Supervisor to under Operations Supervisor.	Revised the following due to “Chemistry Supervisor” position being deleted from AD-EP-ALL-0106.
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:		Yes <input type="checkbox"/> No <input type="checkbox"/>	10 CFR 50.54(q) Effectiveness Evaluation is not required. Enter justification below and complete Attachment 4, Part V.	
Bounding document attached (optional)		<input type="checkbox"/>		
Part III. Editorial Change				
		Yes <input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/>	



<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>The following proposed changes: 1-6,8-19,25,27,28,30,32-36 are editorial as defined by AD-EP-ALL-0602, EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q) and do not cause a reduction in effectiveness of the Robinson Emergency Plan as defined in Regulatory Guide 1.219 section 3.7.a ,therefore require no further evaluation.</p>		<p>10 CFR 50.54(q) Effectiveness Evaluation is not required. Enter justification and complete Attachment 4, Part V.</p>	<p>Continue to Attachment 4, Part IV and address non editorial changes</p>
<p>Part IV. Emergency Planning Element and Function Screen (Reference Attachment 1, Considerations for Addressing Screening Criteria)</p> <p>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.</p>			
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 checked="" 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"/>	
6	10 CFR 50.47(b)(6) Emergency Communications		
6a	Systems are established for prompt communication among principal emergency response organizations.	<input checked="" 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 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 checked="" 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 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 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 checked="" 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"/>
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, then provide Justification and complete Part V below.		
Justification:		<input type="checkbox"/>
<ul style="list-style-type: none"> <li>Changes 20-24 identify and/or clarify specific locations, for positions found either at the near site or Corporate Joint Information Center). These changes are not associated with the 16 standards</li> </ul>		

delineated in 10 CFR 50.47(b). Therefore, the changes do not meet the definition of a reduction in effectiveness as defined in Regulatory Guide 1.219 section 3.7.a.	
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.	■

**Attachment II: 10 CFR 50.54(q) Effectiveness Evaluation Form**

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

Screening and Evaluation Number		Applicable Sites		
EREG #: 2241129		BNP	<input type="checkbox"/>	
		CNS	<input type="checkbox"/>	
		CR3	<input type="checkbox"/>	
		HNP	<input type="checkbox"/>	
5AD #: 2241132		MNS	<input type="checkbox"/>	
		ONS	<input type="checkbox"/>	
		RNP	<input checked="" type="checkbox"/>	
		GO	<input type="checkbox"/>	
Document and Revision PLP-007 Rev. 91		Robinson Emergency Plan		
Part I. Description of Proposed Change:				
#	E-Plan or Procedure Section Reference	Current (Existing) Text	Proposed (Change) Text	Supporting Rationale (Justification) for Change
7	5.4.3.1	<p>“Emergency Coordinator and EOF Director will fill this role.”</p> <p>“The Accident Assessment Team, Plant Operations Director, and Technical Analysis Director will fill this role”</p> <p>“The Technical Analysis Manager is not included in the above categories but is provided high level overview training to assist the ERM”</p>	<p>“TSC Emergency Coordinator will fill this role.”</p> <p>“The TSC Operations and Engineering Manager will fill this role”</p> <p>Deleted</p>	<p>This change moves the responsibilities from EOF personnel to TSC personnel. The EOF was moved to Charlotte these responsibilities will state at RNP.</p>
26	Table 5.3.5-1 Note d	<p>“Communications link between mobile and fixed medical support facilities is by radio and beepers.”</p>	<p>" Communications link between mobile and fixed medical support facilities is by radio or other mobile communications devices. "</p>	<p>This change is made to include all mobile devices and technological changes.</p>
29	5.5 Second Bullet	<p>“SCEMD Local Government Radio”</p>	<p>Deleted</p>	<p>The LGR has been out of service for an extended period</p>

				(2015), there are other methods of communication for emergencies. LGR is not credit for any EAL Declarations
31	5.6.1.2.b	"Every sixth year, the exercise will be expanded to involve the federal response organizations in addition to the state and local organizations."	"Every eighth year, the exercise will be expanded to involve the federal response organizations in addition to the state and local organizations."	Change to support regulatory changes outlined in NUREG-0654/FEMA-REP-1, Supplement 4 and Program Manual Radiological Emergency Preparedness.
37	5.3.2.3. d	<p>d. Operations Supervisor The Operations Supervisor reports to the OSC Manager. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Manage assigned group emergency response activities</li> <li>• Develop requests and coordinate external assistance (technical, craft, admin, etc.)</li> <li>• Arrange for equipment and supply resources</li> <li>• Monitor status and information boards/displays/systems</li> <li>• Participate with OSC Team dispatch and control</li> <li>• Provide input for facility briefs and updates</li> </ul>	<p>d. Operations Supervisor The Operations Supervisor reports to the OSC Manager. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Manage assigned group emergency response activities</li> <li>• Develop requests and coordinate external assistance (technical, craft, admin, etc.)</li> <li>• Arrange for equipment and supply resources</li> <li>• Monitor status and information boards/displays/systems</li> <li>• Participate with OSC Team dispatch and control</li> <li>• Provide input for facility briefs and updates</li> <li>• Perform event detection and assessment activities</li> <li>• Perform chemical sampling and analysis</li> </ul>	Revised the following due to "Chemistry Supervisor" position being deleted from AD-EP-ALL-0106. Moved Old Step5.3.2.3.h 4 <sup>th</sup> and 5 <sup>th</sup> bullets from 'Chemistry Supervisor' to bullets 7 and 8 under "Operations Supervisor".
38	Old Step 5.3.2.3.h	<p>h. Chemistry Supervisor The Chemistry Supervisor reports to the OSC Manager. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Manage assigned group emergency response activities</li> <li>• Develop requests and coordinate external assistance (technical, craft,</li> </ul>	<p>Deleted "Chemistry Supervisor" position as follows: h. Chemistry Supervisor The Chemistry Supervisor reports to the OSC Manager. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Manage assigned group emergency response</li> </ul>	Revised the following due to "Chemistry Supervisor" position being deleted from AD-EP-ALL-0106. Moved Old Step5.3.2.3.h 4 <sup>th</sup> and 5 <sup>th</sup> bullets from 'Chemistry Supervisor' to

		admin, etc.) • Arrange for equipment and supply resources • Perform event detection and assessment activities • Perform chemical sampling and analysis • Participate with OSC Team dispatch and control • Provide input for facility briefs and updates	activities • Develop requests and coordinate external assistance (technical, craft, admin, etc.) • Arrange for equipment and supply resources • Participate with OSC Team dispatch and control • Provide input for facility briefs and updates	bullets 7 and 8 under "Operations Supervisor"
39	Figure 5.3.2-2	Deleted "Chemistry Supervisor"	Moved blocks for "Chemistry Tech 75 min [Note 1] and Chemistry Tech [Note 2]" from Chemistry Supervisor to under Operations Supervisor.	Revised the following due to "Chemistry Supervisor" position being deleted from AD-EP-ALL-0106.

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 ☐  
No ☒

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

Revision 91 of PLP-007, Robinson Emergency Plan, included a review of the following RNP emergency plan licensing basis documents:

- PLP-007, Robinson Emergency Plan (Revision 0, dated 1982)
- PLP-007, Robinson Emergency Plan, Revision 90
- NRC Correspondence- May 11, 1983: Subject: NUREG-0737 Item III.A.2.1- Emergency Plan Upgrade To Meet Rule (H.B. Robinson Unit 2)
- H.B. Robinson Steam Electric Plant, Unit No.2, Updated Final Safety Analysis Report
- NRC approval of Changes to Technical Specifications in RNP amendment 192 date January 14,2002
- NRC approval of Emergency Plan changes in RNP amendment 254 date August 21,2017

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.

**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):

**Change 7:** The change moves the responsibilities described in section 5.4.3.1 from personnel in the EOF to Personnel in the TSC. The EOF was moved to Charlotte. Therefore, these responsibilities described in this section will stay at the plant. RNP continues to have an organization for coping with radiological emergencies. This change does not alter or remove previous

site-specific commitments. The RNP emergency plan continues to meet the regulatory requirements in 10CFR 50.47(b)(1) and (2) and 10 CFR Part 50 Appendix E, Section IV.A Organization.

**Change 26:** The change from “beepers” to “other mobile communication devices.” provides an enhancement and support to the RNP emergency plan, this change provides for inclusion of all mobile devices and technological advances. RNP continues to maintain various mobile methods of communications with fixed and mobile medical support facilities. RNP continues to maintain the ability to provide prompt communications among principle response organizations. This change does not reduce the availability and reliability of primary and backup communications systems used to maintain communications with medical support facilities in accordance with the emergency plan. This change does not alter or reduce the effectiveness of the RNP emergency plan. The change described continues to meet the NRC requirements as described in 10 CFR 50.47 (b)(6) and 10 CFR 50 Appendix E, Section IV.D.1 Notification Procedures.

**Change 29:** The removal of SCEMD Local Government Radio does not reduce the effectiveness of RNP’s ability or capability to notify responsible State and local governmental agencies within 15 minutes. RNP continues to maintain a primary means of notification the Duke Energy Emergency Management Network (DEMNET) along with multiple other back up communication methods. RNP continues to maintain a provision for communications with contiguous State/local governments within the plume exposure pathway EPZ. This change does not reduce the effectiveness of the RNP emergency plan. The change described continues to meet the NRC requirements as described in 10 CFR 50.47 (b)(6) , 10 CFR 50 Appendix E, Section IV.E.9 Emergency Facility and Equipment and 10 CFR 50 Appendix E, Section IV.D.1 Notification Procedures.

**Change 31:** The transition from “every sixth year” to “every eighth year” does not reduce the effectiveness or capability to conduct periodic drills of emergency plans to ensure that employees are familiar with specific emergency response duties. This change brings RNP in alignment with regulatory changes outlined in NUREG-0654/FEMA-REP-1, Supplement 4 and Program Manual Radiological Emergency Preparedness. RNP will maintain the ability to conduct 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. The change described continues to comply with the NRC requirements as described in 10 CFR 50.47 (b) (14) and 10 CFR 50 Appendix E, Section IV.F.2. Thus, does not alter or reduce the effectiveness of the RNP emergency plan.

**Changes 37, 38 and 39:** Moves Chemistry Supervisor responsibilities and procedure steps to Operations Supervisor in the OSC. This change is due to staffing analysis and efficiency gains. During normal and emergency operations, operations procedures direct when to take chemistry samples. When procedures direct a chemistry sample, operations contacts chemistry to perform samples and report results to control room. This process will only modify, by location, when OSC is activated. The OSC Operations Supervisor will be in contact with the control room during declared emergencies and as samples are required by procedure, the OSC Operations Supervisor will direct chemistry to perform samples and report results to the OSC. The OSC Operations Supervisor is trained to direct and control in-plant operations as directed by procedure. The OSC Operations Supervisor is aware of plant conditions and will continue to dispatch missions including requesting chemistry samples using OSC resources ensuring radiological and personnel safety. Chemistry samples will continue to be assessed in TSC for upgrades in classification and core damage assessments. Responsibilities for chemistry sampling continue to be defined and timely augmentation of chemistry sampling supervision is available. The ERO continues to be staffed to augment initial response on a continuous basis. Thus, the RNP Emergency Plan will continue to comply with 10 CFR 50.47(b)(1) Assignment of Responsibility/Organizational Control, 10 CFR 50.47(b)(2), Onsite Emergency Organization, and 10 CFR Part 50 Appendix E, Section IV.A *Organization*.

The changes evaluated above continue to meet NRC requirements as described in 10 CFR 50.47(b) and 10 CFR 50, Appendix E.



Proposed Change (Address each function identified in Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part IV of associated Screen):

Changes 7 and 37-39

**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.

**10CFR50 Appendix E.IV.A. Organization**

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.

The associated **EP Function** is Function 1b, "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."

Program Element **NUREG-0654** Section II.A

A.1.e. Each organization shall provide for 24-hour emergency response, including 24-hour per day manning of communication links.

A.4 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.

**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.

The associated **EP Function** is Function 2a, "Process ensures that onshift emergency response responsibilities are staffed and assigned" and Function 2b, "The process for timely augmentation of onshift staff is established and maintained."

Program Elements **NUREG-0654** Section II.B

B.1 Each licensee shall specify the onsite emergency organization of plant staff personnel for all shifts and its relation to the responsibilities and duties of the normal staff complement.

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 minimum on-shift staffing levels shall be as indicated in Table B-1. 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. The implementation schedule for licensed operators, auxiliary operators and the shift technical advisor on shift shall be as specified in the July 31, 1980 letter to all power reactor licensees. Any deficiencies in the other staffing requirements of Table B-1 must be capable of augmentation within 30 minutes by September 1, 1981, and such deficiencies must be fully removed by July 1, 1982.

Changes 26 and 29

**10 CFR 50.47(b)(6)** Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

#### **10CFR50 Appendix E.IV.D. Notification Procedures**

1. Administrative and physical means for notifying local, State, and Federal officials and agencies and agreements reached with these officials and agencies for the prompt notification of the public and for public evacuation or other protective measures, should they become necessary, shall be described. This description shall include identification of the appropriate officials, by title and agency, of the State and local government agencies within the EPZs.

The associated **EP Function** is Function 6a, "Systems are established for prompt communication among principal emergency response organizations."

#### **10CFR50 Appendix E.IV.E. Emergency Facilities and Equipment**

9. At least one onsite and one offsite communications system; each system shall have a backup power source. All communication plans shall have arrangements for emergencies, including titles and alternates for those in charge at both ends of the communication links and the primary and backup means of communication. Where consistent with the function of the governmental agency, these arrangements will include:

a. Provision for communications with contiguous State/local governments within the plume exposure pathway EPZ.

The associated **EP Function** is Function 8b, "Adequate equipment is maintained to support emergency response."

Program Elements **NUREG-0654** Section II.F

- 1.b Provision for communications with contiguous State/local governments with the Emergency Planning Zones.
2. Each organization shall ensure that a coordinated communications link for fixed and mobile medical support facilities exists.

Change 31

**10 CFR 50.47(b)(14)** Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

#### **10CFR50 Appendix E.IV.F. Training**

2. The plan shall describe provisions for the conduct of emergency preparedness exercises as follows: Exercises shall test the adequacy of timing and content of implementing procedures and methods, test emergency equipment and communications networks, test the public alert and notification system, and ensure that emergency organization personnel are familiar with their duties.

The associated **EP Functions** are:

Function 14a “A drill and exercise program (including radiological, medical, health physics, or other program areas) is established.”

Function 14b “Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.”

Program Elements **NUREG-0654** Section II.N

1.a. An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. The emergency preparedness exercise shall simulate an emergency that results in offsite radiological releases which would require response by offsite authorities. Exercises shall be conducted as set forth in NRC and FEMA rules.

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

**Change 7:** The change moves the responsibilities described in section 5.4.3.1 from personnel in the EOF to Personnel in the TSC. The EOF was moved to Charlotte. Therefore, these responsibilities described in this section will stay at the plant. RNP continues to have a 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. This change does not reduce the effectiveness of the RNP emergency plan.

**Change 26:** The change from “beepers” to “other mobile communication devices.” provides an enhancement and support to the RNP emergency plan, this change provides for inclusion of technological advances. RNP continues to maintain various methods of communications with medical support facilities. RNP continues to maintain systems to provide prompt communications among principle response organizations, and adequate equipment is maintained to support emergency response. This change does not reduce the effectiveness of the RNP emergency plan.

**Change 29:** The removal of SCEMD Local Government Radio(LGR) does not reduce the effectiveness of RNP’s ability or capability to notify responsible State and local governmental agencies within 15 minutes. The Local Government Radio system, is a state owned, operated, and maintained system. The LGR system has not been operable in the RNP area for several years, and there is not a timeline to restore the system to operation. The LGR system once used by the state to communicate with the counties, and initially thought to be a backup communication method for notification. This system was not ever utilized by RNP for notification. RNP continues to maintain various methods of communications with contiguous State/local governments within the plume exposure pathway EPZ. RNP continues to maintain systems to provide prompt communications among principle response organizations, and adequate equipment is maintained to support emergency response. This change does not reduce the effectiveness of the RNP emergency plan.

**Change 31:** The transition from “every sixth year” to “every eighth year” does not reduce the effectiveness or capability to conduct periodic drills of emergency plans to ensure that employees are familiar with specific emergency response duties. This change brings RNP in alignment with regulatory changes outlined in NUREG-0654/FEMA-REP-1, Supplement 4 and Program Manual Radiological Emergency Preparedness. RNP continues to have an established drill and exercise program (including radiological, medical, health physics, or other program areas). RNP continues to maintain the ability to conduct drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills, are assess via a formal critique process in order to identify weaknesses. Therefore, the change does not reduce the effectiveness of the RNP emergency plan.

**Changes 37, 38 and 39:** Moves Chemistry Supervisor responsibilities and procedure steps to Operations Supervisor in the OSC. This change is due to staffing analysis and efficiency gains. During normal and emergency operations, operations procedures direct when to take chemistry samples. When procedures direct to take a chemistry sample, operations contacts chemistry to perform samples and report results to control room. This process will only modify by location when OSC is activated. The OSC Operations Supervisor will be in contact with control room during declared emergencies and as samples are required by procedure, the OSC Operations Supervisor will direct chemistry to perform samples and report results to OSC. The OSC Operations Supervisor is trained to direct and control in-plant operations as directed by procedure. The OSC Operations Supervisor is aware of plant conditions and will continue to dispatch missions including requesting chemistry samples using OSC resources ensuring radiological and personnel safety. Chemistry samples will continue to be assessed in TSC for upgrades in classification and core damage assessments. Responsibilities for chemistry sampling continue to be defined and timely augmentation of chemistry sampling supervision is available. The ERO continues to be staffed to augment initial response on a continuous basis. The change does not reduce the effectiveness of the RNP emergency plan.

The changes described provide 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.

Thus there is no reduction in effectiveness of the Robinson Emergency Plan.

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"/>	