



June 4, 2019

NG-19-0062
10 CFR 50.54(q)
10 CFR 72.44(f)

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Duane Arnold Energy Center
Docket No. 50-331
Renewed Op. License No. DPR-49

Revision to Duane Arnold Energy Center (DAEC) Emergency Plan Section B and Appendix 6

NextEra Energy Duane Arnold, LLC issued revisions to the DAEC's Emergency Plan Section B and Appendix 6 on 05/16/19. These revisions incorporated changes that do not reduce the effectiveness of the DAEC Emergency Plan. Pursuant to 10 CFR 50.54(q)(5) and 10 CFR 72.44(f), enclosed are the 50.54(q) Screening and Evaluation forms which provide a summary of the changes and analysis.

This letter contains no new commitments and no revisions to existing commitments.

If you have any questions or require additional information, please contact Mike Davis, Licensing & Emergency Preparedness Manager at (319) 851-7032.

A handwritten signature in blue ink, appearing to read "Dean Curtland".

Dean Curtland
Site Director, Duane Arnold Energy Center
NextEra Energy Duane Arnold, LLC

Enclosure

cc: Director, Division of Spent Fuel Management
Administrator, Region III, USNRC
Resident Inspector, DAEC, USNRC

Enclosure to NG-19-0069

Duane Arnold Energy Center
50.54(q) Screening and Evaluation Forms

Thirteen Pages Follow

10CFR50.54(q) SCREENING FORM

Page 1 of 3

PCR/AR/NAMS No.: 2310522 and 2310525

SECTION 1: STATION APPLICABILITY

Applicable activity for review (process, document, modification, etc):

Applicable Site: ☒ Duane Arnold Energy Center ☐ Point Beach ☐ Seabrook ☐ St. Lucie ☐ Turkey Point

SECTION 2: PURPOSE

Identify the reason for the screening:

- ☒ 10CFR50.54(q) screening of a Change to the Emergency Plan or procedures implementing the Plan
☐ Emergency Preparedness Function Assessment

SECTION 3: PROVIDE A BRIEF DESCRIPTION OF PROPOSED CHANGE AND LIST THE PROCESS/DOCUMENT THAT IS DRIVING THE CHANGE.

Procedure Number and Current Revision:

1. E Plan Section B *Emergency Response Organization*, Current Revision is 41
2. EPIP 2.1, *Activation and Operation of the Operational Support Center (OSC)*, Current Revision is 25

Process/Document Driving Change: PCRs 2310522, 2310558, 2310556, 2310555, 2310546, and 2310525

Brief Description (include why the change is being made): A review of current TSC positions was conducted looking at positions that were possibly being underutilized. Two positions were identified and a task analysis was undertaken looking at the TSC Clerical and TSC Rad Support Staff. Both positions were determined to be underutilized and have been eliminated. Tasks were either eliminated or reassigned to the TSC Admin Supervisor and TSC Site Rad Pro Coordinator.

☐ Check if EAL Validation & Verification is Attached (required for EAL change not in the NRC SER)

SECTION 4: DETAILED DESCRIPTION OF ACTIVITY BEING REVIEWED. The "activity" is an 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.

Change Number	Description of Change	Reason for Change	Screening	Planning Standard / Program Element *
1.	Amend E Plan Section B <i>Emergency Organization</i> , Figure B-1 <i>Emergency Response Organization – Onsite ERO</i> to reflect the elimination of the TSC Clerical and Rad Support Staff positions. Neither of these positions is a key, minimum staffing position.	The TSC Clerical and Rad Support staff positions are underutilized and have been eliminated.	<input type="checkbox"/> Editorial Change: Analysis is NOT required <input type="checkbox"/> Proposed change does NOT affect the Planning Standards /Program Elements: Analysis is NOT required	10 CFR 50.47(b)(1) 10 CFR 50.47(b)(2) 10 CFR Part 50, Appendix E,

10CFR50.54(q) SCREENING FORM

Page 2 of 3

PCR/AR/NAMS No.: 2310522 and 2310525

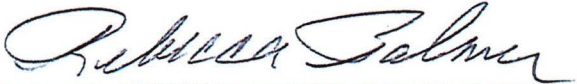


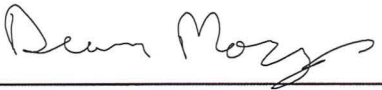
			<input checked="" type="checkbox"/> Proposed change DOES affect the Planning Standards / Program Elements: Analysis IS required	Sections IV.A.1
2.	EPIP 2.1, Activation and Operation of the Operational Support Center (OSC), Rev. 26 Page 15, 4.0 RECORDS: Replace TSC Clerical Staff with TSC Administrative Supervisor: (1) All records generated as a result of this procedure should be submitted to the TSC Administrative Supervisor for filing.	The TSC Admin Supervisor will assume records gathering responsibilities with the elimination of the TSC Clerical Support Position.	<input type="checkbox"/> Editorial Change: Analysis is NOT required <input checked="" type="checkbox"/> Proposed change does NOT affect the Planning Standards /Program Elements: Analysis is NOT required <input type="checkbox"/> Proposed change DOES affect the Planning Standards / Program Elements: Analysis IS required	

* Planning Standard / Program Element from Section 7

SECTION 5: RESULTS OF SCREENING

- ☐ If **NO** Section 7 criteria are affected, a 10CFR50.54(q) Evaluation is **NOT** required.
- ☒ If **ANY** Section 7 criteria are affected, go to Form 2 to perform a 10CFR50.54(q) Evaluation.

SECTION 6: SIGNATURE

Prepared by (Print Name)	Signature	Date
Rebecca Palmer		May 13, 2019
Reviewed by (Print Name)	Signature	Date
Bob Murray		5/13/19
SFAM Approval (Print Name)	Signature	Date
Mike Davis		5/14/19
CFAM Approval (Print Name)	Signature	Date
Dean Morgan		5-14-19

10CFR50.54(q) SCREENING FORM

Page 3 of 3

PCR/AR/NAMS No.: 2310522 and 2310525

Section 7: Are any of the following affected by this change? (Document in Section 4 for each change.)

No.	Planning Standards / Functions	Requirement	YES	NO
1.	Responsibility for emergency response is assigned..	50.47(b)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.	The response organization has the staff to respond and to augment staff on a continuing basis (i.e., 24/7 support) in accordance with the emergency plan.	50.47(b)(1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.	The process ensures that onshift emergency response responsibilities are staffed and assigned (including on-shift staffing study and assumptions)	50.47(b)(2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.	The process for timely augmentation of onshift staff is established and maintained.	50.47(b)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.	Arrangements for requesting and using offsite assistance have been made.	50.47(b)(3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.	State and local staff can be accommodated at the EOF in accordance with the emergency plan.	50.47(b)(3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7.	A standard scheme of emergency classification and action levels is in use.	50.47(b)(4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.	Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes after declaration of an emergency and providing follow-up notifications.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.	Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10.	The public ANS meets the design requirements of FEMA-REP-10, "Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants", or is compliant with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11.	Systems are established for prompt communication among principal emergency response organizations.	50.47(b)(6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12.	Systems are established for prompt communication to emergency response personnel.	50.47(b)(6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13.	Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway EPZ.	50.47(b)(7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14.	Coordinated dissemination of public information during emergencies is established.	50.47(b)(7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15.	Adequate equipment & facilities are maintained to support emergency response.	50.47(b)(8)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16.	Methods, systems, and equipment for assessment of radioactive releases are in use	50.47(b)(9)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17.	A range of public PARs is available for implementation during emergencies.	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18.	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.	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
19.	A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20.	The resources for controlling radiological exposures for emergency workers are established.	50.47(b)(11)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
21.	Arrangements are made for medical services for contaminated, injured individuals	50.47(b)(12)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
22.	Plans for recovery and reentry are developed.	50.47(b)(13)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
23.	A drill and exercise program (including radiological, medical, health physics, and other program areas) is established.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
24.	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.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
25.	Identified weaknesses are corrected.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
26.	Training is provided to emergency responders.	50.47(b)(15)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
27.	Responsibility for emergency plan development and review is established.	50.47(b)(16)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
28.	Planners responsible for emergency plan development and maintenance are properly trained.	50.47(b)(16)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

10CFR50.54(q)(2) – REVISING THE EMERGENCY PLAN EVALUATION FORM

(Page 1 of 7)

PCR/AR/NAMS No: 2310522 and 2310525

SECTION 1: THE CHANGE NUMBER(S) IDENTIFIED IN SECTION 4 OF THE SCREENING FORM THAT IS BEING EVALUATED

Change 1: Revised E Plan Section B *Emergency Response Organization*, Figure B-1 *Emergency Response Organization – Onsite ERO*, by eliminating the positions of TSC Clerical and TSC Rad Support Staff in the organizational chart.

SECTION 2: LIST EACH OF THE EMERGENCY PLANNING FUNCTION(S) AFFECTED BY THIS PROPOSED CHANGE

10 CFR 50.47(b)(1), Assignment of Responsibility/Organizational Control

Two emergency planning functions have been defined for this planning standard and one relates to the proposed change:

- (1) Responsibility for emergency response is assigned.

10 CFR 50.47(b)(2), Onsite Emergency Organization: [On-shift]

Two emergency planning functions have been defined for this planning standard and one relates to the proposed change:

- (2) The process for timely augmentation of on-shift staff is established and maintained.

10 CFR Part 50, Appendix E, IV.A.1. 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.

SECTION 3: LIST THE NRC REGULATORY GUIDANCE DOCUMENTS, NRC GENERIC COMMUNICATIONS SUCH AS ADMINISTRATIVE LETTERS, BULLETINS, GENERIC LETTERS, INFORMATION NOTICES AND REGULATORY ISSUE SUMMARIES. ADDITIONALLY LIST SITE COMMITMENTS AS A RESULT OF ITEMS SUCH AS NRC INSPECTION FINDINGS, SAFETY EVALUATIONS, ATOMIC SAFETY LICENSING BOARD.

NRC RELATED DOCUMENTS

Regulatory Guide 1.219, Rev. 1 *Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors*

10 CFR 50.47(b)(1), Assignment of Responsibility/Organizational Control: 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.

- (2) Responsibility for emergency response is assigned.

- (c)(1) A change could require prior NRC approval if it would reduce the authority and responsibility of persons filling key positions to perform their emergency assignments in accordance with the emergency plan.

10 CFR 50.47(b)(2), Onsite Emergency Organization: [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.

- (2) The process for timely augmentation of on-shift staff is established and maintained.

- (c)(3) A change could require prior NRC approval if it eliminates key positions identified in the plan and reassigns the responsibilities of the eliminated positions to other key positions (e.g., multiple functions) and if it would result in an ERO member being assigned duties that could be expected to be performed concurrently rather than sequentially. An example of this type of change would be one in which control room communicator responsibilities

10CFR50.54(q)(2) – REVISING THE EMERGENCY PLAN EVALUATION FORM

(Page 2 of 7)

PCR/AR/NAMS No: 2310522 and 2310525

are assigned to a fire brigade member or one in which dose assessment responsibilities are assigned to a shift technical advisor.

SITE COMMITMENTS

Updated Final Safety Analysis Report Duane Arnold Energy Center

AFSAR 13.3 Emergency Planning (relevant excerpt)

The Duane Arnold Energy Center Emergency Plan has been submitted to the NRC as a separate document. Provisions have been made for periodic review and updating of the Emergency Plan. Provisions have also been made for informing all concerned persons of significant revisions to the Emergency Plan and procedures. Revisions to the Emergency Plan and procedures are also submitted to the NRC.

An onsite Technical Support Center (TSC), an onsite Operational Support Center (OSC), and an offsite Emergency Facility adjacent to the administration building north of the turbine building

The DAEC TSC, OSC, and EOF are fully functional and meet the requirements of Section 8 of Supplement 1 to NUREG-0737.

Safety Evaluation Reports

1982 SER - H. Emergency Facilities and Equipment (pertinent excerpts)

Emergency facilities needed to support an emergency response have been provided including a TSC, EOF, and OSC. The TSC and OSC will be activated for any Alert or higher emergency classification, and the EDF will be activated for any Site Area or General Emergency classification.

The TSC is located in a new facility adjacent to the Administration Building, and is staffed by plant management and technical personnel to provide technical support to control room activities. Space is also provided for at least five NRC personnel. Personnel in the TSC are protected from radiological hazards, including direct radiation and airborne contaminants under accident conditions. To ensure adequate radiological protection, permanent radiation monitoring systems have been installed. These systems continuously indicate radiation dose rates and airborne radioactivity inside the TSC while in use. In addition, closed circuit TV cameras with pan and zoom capabilities are installed in the control room and can be controlled from the TSC to provide direct video representation of the main control panel instrumentation. Protective breathing apparatus are available for use as needed. The TSC has access to a complete set of as-built drawings and other records, including general arrangement diagrams, P&IDs, piping system isometrics, and electrical schematics. A CRT display of critical plant parameters monitored by the process computer is available in the TSC. Additionally, plant parameters and status information of significance to the event can be transmitted using a VAX computer terminal as well as by telephone, intercom, and radio.

2017 SER – 1.0 Introduction

The following proposed changes would revise the DAEC Emergency Plan, as follows:

1. Section A, "Assignment of Responsibilities (Organizational Control)," Subsection 2.5, "Direction and Coordination," clarifies the Emergency Response Organization (ERO) activation criteria.
2. Section B, "Emergency Response Organization," Subsection 2.2, "Onsite Response Assignments":
 - a) Revises the response time for the following ERO positions from 30 minutes to 60 minutes:
 - Emergency Coordinator,

10CFR50.54(q)(2) – REVISING THE EMERGENCY PLAN EVALUATION FORM

(Page 3 of 7)

PCR/AR/NAMS No: 2310522 and 2310525

- Site Radiation Protection Coordinator,
- Security and Support Supervisor,
- Technical and Engineering Supervisor,
- Reactor Engineer,
- Operational Support Center (OSC) Supervisor, and
- Health Physics (HP) Supervisor.

3.2.3 Notification/Communications

The licensee states that DAEC will have an on-shift dedicated communicator and the TSC will have the operations liaison and NRC emergency notification systems communicator respond to the TSC within 60 minutes of an Alert declaration or higher,

3.2.4 Radiological Accident Assessment and Support of Operational Assessment/Protective Actions (In-Plant).

The function of onsite radiological assessment is to: review radiological conditions onsite using data from available instrumentation; assess the impact of changing radiological conditions on emergency classification; assist in accident assessment based upon those changing radiological conditions, and recommend appropriate onsite protective measures. This major functional area includes the following tasks:

Overall Utility Emergency Management and Offsite Agency Interface: This major task was discussed previously in the Emergency Direction and Control Major Functional Area.

Offsite Dose Assessment and PARs: The guidance in NUREG-0654, Table 8-1 identifies one person to perform the offsite dose assessment function as a 30-minute augmented position.

In its submittal, the licensee states that the Site Radiation Protection Coordinator and MIDAS operator in the TSC are tasked with offsite dose assessment and PARs. These positions would respond within 60 minutes of an Alert declaration or higher. The on-shift chemistry technician is tasked with performing dose assessments until relieved by the MIDAS operator. An additional chemistry technician responds within 60 minutes of an Alert classification or higher. The on-shift chemistry technician can adequately perform this task for an additional 30 minutes until relocated to the TSC and reassigned as the MIDAS operator.

Based on the licensee's current dose assessment capability and the use of a dedicated on-shift position to perform dose assessment, the NRC staff concludes that there is no loss of function or impact on the timing for performing dose assessment. Therefore, with the proposed changes, the DAEC Emergency Plan continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

3.3.2 DAEC Emergency Plan - Section B. "Emergency Response Organization" B. 2. 2 - "Onsite Response Assignments":

The licensee proposed changes related to the ERO in addition to those discussed previously in Section 3.2. The NRC staff has determined that the changes, as described below, are an acceptable approach to meeting the intent of the guidance and to maintain compliance with the regulations. [Note that the responding ERO has two distinct purposes: (1) some positions relieve the on-shift staff of emergency response responsibilities, thus allowing them to focus on their other (non-emergency plan) responsibilities, and (2) some positions are intended to support the licensee's implementation of the DAEC Emergency Plan.]

- Site Radiation Protection Coordinator: The licensee proposed to revise the response time for this position from 30 minutes to 60 minutes. The NRC staff determined that the enhancements in technology and training compensate for the additional 30 minutes where the operations shift manager must fulfill the Site Radiation Protection Coordinator role until relieved.

10CFR50.54(q)(2) – REVISING THE EMERGENCY PLAN EVALUATION FORM

(Page 4 of 7)

PCR/AR/NAMS No: 2310522 and 2310525

- Security and Support Supervisor: The licensee proposed to revise the response time for this position from 30 minutes to 60 minutes. The NRC staff determined that the enhancements in technology and training compensate for the additional 30 minutes where the on-shift ERO must function without this support position.

B. 2. 2. 13 - Minimum Staffing:

The licensee noted that the on-shift staff has been validated by an on-shift staffing analysis as required by 10 CFR 50 Appendix E.IV.A.9. This does not invalidate any aspect of the DAEC Emergency Plan and is acceptable.

Figure B-1, "On-Site Emergency Response Organization":

The licensee proposed many changes to this figure, particularly in order to delineate which ERO positions are considered minimum staff. While some of these changes were not specifically discussed in the licensee's application and supplemental letters, the NRC staff has determined that the changes are an acceptable approach to meeting the intent of the guidance and to maintaining compliance with the regulations.

4.0 SUMMARY

The NRC staff performed a technical and regulatory review of the proposed changes to the DAEC Emergency Plan. The staff determined that these changes do not alter the intent of any - 13 - major functional area or major task, and is an acceptable approach to meeting the intent of the guidance and to maintaining compliance with the regulations. The staff has determined that there is reasonable assurance the licensee can and will take adequate protective measures in the event of a radiological emergency. The staff also reviewed the concurrence to these changes provided by applicable offsite response officials, as documented in Enclosure 3 of the licensee's supplemental letter, dated April 7, 2017.

Based on the above, the NRC staff has determined that the proposed changes meet the guidance in NUREG-0654, planning standard 10 CFR 50.47(b)(4), and the requirements in Appendix E to Part CFR 50. Therefore, the NRC staff concludes that the proposed DAEC Emergency Plan changes, provided as Enclosure 1, Attachment 2, of the licensee's supplemental letter dated June 19, 2017, are acceptable.

ONSITE COMMITMENTS

DAEC E-Plan, Section B., 2.2.4, SITE RADIATION PROTECTION COORDINATOR

- (1) Assignment, (a): The Site Radiation Protection Coordinator will operate from the TSC and initiate those activities related to radiological assessment of the environs surrounding the plant during the initial states of the event. Offsite monitoring will be assumed by the Radiological Assessment Coordinator upon activation of the EOF.
- (3) Responsibilities: (b) The Site Radiation Protection Coordinator is responsible for the following activities:
 - Ensuring that DAEC personnel are dispatched to monitor the environs in and around the plant for radiological consequences associated with the event.
 - Conducting an initial evaluation and assessment of the results of radiological monitoring activities. Upon activation of the EOF, evaluation and assessment of all offsite monitoring activities will be assumed by the Radiological Assessment Coordinator.
 - Assessing the onsite radiological consequences and directing protective measures, including the need for partial or complete evacuation of the plant.
 - During the initial states of the event, apprising local and state authorities, through the Emergency Coordinator, of the results of radiological monitoring activities and providing protective action recommendations based upon the projected radiological consequences to the population at risk. Upon activation of the EOF, this function will be assumed by the Radiological Assessment

10CFR50.54(q)(2) – REVISING THE EMERGENCY PLAN EVALUATION FORM

(Page 5 of 7)

PCR/AR/NAMS No: 2310522 and 2310525

Coordinator.

DAEC E-Plan, Section B, 2.2.5, SECURITY AND SUPPORT SUPERVISOR

(1) Assignment, (a): The Security and Support Supervisor will exercise supervision and direction of the security staff and direction over the personnel assigned to the TSC support staff.

(3) Responsibilities, (b): Upon Activation of the TSC, the Security and Support Supervisor is responsible for:

- Assuring that an accountability check for all personnel within the protected area is conducted in a timely fashion and that requisite security posts are filled.
- Ensuring that the Emergency Response Organization notification process as described in the Emergency Plan Implementing Procedures has been initiated and is successfully completed.
- Assuring the TSC closed ventilation system is operational and activated.
- Limiting access into the facility to only those personnel who are members of the Emergency Response Organization, or otherwise are authorized.
- Establishing measures that will enable continuous accountability for all personnel within the protected area once the initial accountability check has been completed.
- Ensuring that no unauthorized personnel gain access to the site.
- Assigning personnel for first aid duties, as required.
- Providing overall management and direction to the support staff assembled in the TSC.

DAEC E-Plan, Section B, 2.2.8 ADMINISTRATIVE SUPERVISOR, (3) Responsibilities, (b) Services to be provided under the direction of the Administrative Supervisor include, but are not limited to:

- Clerical, typing, and copying services.
- Document retrieval.
- Food services, clothing, and overnight accommodations.
- Coordination of transportation services and any facilities or office space needs.

Determining existing and potential administrative needs and providing recommendations to the Security & Support Supervisor, as required.

SECTION 4: DESCRIBE HOW THE PROPOSED CHANGE TO THE EMERGENCY PLAN COMPLIES WITH THE (1) FUNCTION AND (2) TIMING OF THE FUNCTION FOR THE ITEMS DESCRIBED IN SECTION 2 AND 3

The Rad Support Staff is not a key, minimum staffing position in the TSC. The duties of the Rad Support Staff are to document and trend ARM readings via the VAX, PPC, or from values obtained via the Control Room Communicator in order to keep the Site Rad Pro Coordinator (SRPC) aware of increasing trends. It should be noted that the SRPC is already tracking this data. The Rad Support Staff provides support to the MIDAS Operator, when requested, in performing dose projections and can provides support to the Field Team Director in directing onsite and offsite field monitoring teams. The Rad Support Staff position serves in a limited administrative support capacity to the SRPC, MIDAS Operator, and Field Team Director.

The SRPC will assume the tasks of updating the PAR Status and Wind Spider boards; monitor the TSC radiation monitors; obtain area radiation monitor data via SPDS from Tech & Analysis Engineer; provide alarming ARM data to the TSC Communicator for update to the Status Board; and notify the OSC HP Supervisor of any changes in ARM data.

These are all tasks the SRPC remains engaged with as part of their ERO position core functions. The elimination of this support position will add no significant new tasks or time commitments to the SRPC or other positions and therefore will not change position functions. Any change in the timing of those functions is minimal and will not interfere with response in accordance with the DAEC E-Plan.

The TSC Clerical Position is not a key, duty position. The TSC Clerical position supports the TSC and OSC through maintaining paper and office supplies, distributing the microphones and turning on the

10CFR50.54(q)(2) – REVISING THE EMERGENCY PLAN EVALUATION FORM

(Page 6 of 7)

PCR/AR/NAMS No: 2310522 and 2310525

sound system, document services (copying, faxing, and distributing), reviewing the 24-hour staffing roster (created by Admin Supervisor), journaling data from the Priority Board and Repair Team Board, and collecting event or drill documents. These functions are all supportive in nature; they serve to provide assistance to the primary functions of the TSC Admin Supervisor and Security and Support Supervisor.

The Admin Supervisor will assume the following tasks, which had been delegated to the TSC Clerical position: ensure hallway entrance doors to the TSC/OSC have been closed; switch fax phone line to 'emergency;' make copies of NOTE-05 forms faxed to the TSC and distribute, along with other documents, as needed; distribute wireless mics; journal data from the Priority and Repair Team boards, and collect documents at the end of an event or drill. Also note that, through a concurrent project, the TSC Admin Supervisor will no longer act as Phone Talker for NOTE-05 offsite notifications (see 2310188). The Security and Support Supervisor will assume the task of reviewing the 24-hour staffing roster for the Admin Supervisor before submitting the schedule to the EC for review and approval.

The elimination of the TSC Clerical Support will add no significant tasks or new functions to other positions. The majority of the tasks are one time only actions. The position elimination will not change the E-Plan functions of the Admin Supervisor or Security and Support Supervisor, or the timing of those functions.

As demonstrated by the Task Analysis and changes outlined above:

- (1) The positions to be eliminated are not key, minimum staffing positions.
- (2) Duties remaining and being reassigned are limited scope, administrative in nature; often times single one-time tasks, and will not create a time burden to the other positions taking on the tasks.
- (3) The functional responsibilities assigned to the SRPC, Administrative Supervisor, and Security and Support Supervisor remain the same.
- (4) There are no site commitments that are impacted by the changes being implemented as there are no changes in key minimum staff positions and no change in staff augmentation time to the TSC facility.
- (5) The elimination of the Clerical and Rad Support Staff from the E Plan, Figure B-1 *Organizational Chart* –Onsite ERO is being completed in a way that is unambiguous and maintains adequate staffing in the TSC.

SECTION 5: RESULTS OF EVALUATION: ANSWER THE FOLLOWING QUESTIONS BASED ON THE EVALUATION




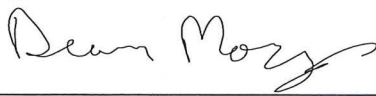
1. Does the proposed change comply with 10CFR50.47(b) and 10CFR50 Appendix E?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Does the proposed change maintain the emergency plan with no reduction in effectiveness?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<input checked="" type="checkbox"/>	The answer to BOTH question 1 & 2 are YES. The proposed change may be implemented without prior NRC approval.
<input type="checkbox"/>	The answer to EITHER question 1 or 2 is NO. Prior approval by the NRC is required prior to implementation.

10CFR50.54(q)(2) – REVISING THE EMERGENCY PLAN EVALUATION FORM

(Page 7 of 7)

PCR/AR/NAMS No: 2310522 and 2310525

SECTION 7: SIGNATURE

Prepared by (Print Name) Rebecca Palmer	Signature 	Date May 13, 2019
Reviewed by (Print Name) <i>Bob Murren</i>	Signature 	Date <i>5/13/19</i>
SFAM Approval (Print Name) <i>Mike Davis</i>	Signature 	Date <i>5/14/19</i>
CFAM Approval (Print Name) Dean Morgan	Signature 	Date 5-14-19

10CFR50.54(q) SCREENING FORM

Page 1 of 3

PCR/AR/NAMS No.: 2277166

SECTION 1: STATION APPLICABILITY

Applicable activity for review (process, document, modification, etc):

Applicable Site: ☒ Duane Arnold Energy Center ☐ Point Beach ☐ Seabrook ☐ St. Lucie ☐ Turkey Point

SECTION 2: PURPOSE

Identify the reason for the screening:

☒ 10CFR50.54(q) screening of a Change to the Emergency Plan or procedures implementing the Plan

☐ Emergency Preparedness Function Assessment

SECTION 3: PROVIDE A BRIEF DESCRIPTION OF PROPOSED CHANGE AND LIST THE PROCESS/DOCUMENT THAT IS DRIVING THE CHANGE

Procedure Number and Current Revision: DAEC Emergency Plan, Appendix 6, *Definitions*, Rev. 29

Process/Document Driving Change: PCR 2277166

Brief Description (include why the change is being made): NOS identified; recommended enhancement: Correct typo in Item 27 by changing the word "can" to "and".

☐ Check if EAL Validation & Verification is Attached (required for EAL change not in the NRC SER)

SECTION 4: DETAILED DESCRIPTION OF ACTIVITY BEING REVIEWED. The "activity" is an 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.

Change Number	Description of Change	Reason for Change	Screening	Planning Standard / Program Element *
1.	<p>DAEC Emergency Plan, Appendix 6, <i>Definitions</i>, Rev. 29, Page 4 of 7, Item No. 27:</p> <p><u>Facility Activation</u> – Activation of Emergency Response Facilities occurs when the minimum staff at each facility, as noted in Figure B-1, has arrived, been briefed on the event, and is ready to perform command <i>and</i> control functions. Although the facility may be ready turnover may be postponed in the interest of completing critical tasks. (Italics added)</p> <p>Replace typo "can," "command can control" to "and" in order to read "command and control".</p>	Correct typo.	<p><input checked="" type="checkbox"/> Editorial Change: Analysis is NOT required</p> <p><input type="checkbox"/> Proposed change does NOT affect the Planning Standards /Program Elements: Analysis is NOT required</p> <p><input type="checkbox"/> Proposed change DOES affect the Planning Standards / Program Elements: Analysis IS required</p>	

10CFR50.54(q) SCREENING FORM

Page 2 of 3





PCR/AR/NAMS No.: 2277166

* Planning Standard / Program Element from Section 7

SECTION 5: RESULTS OF SCREENING

- ☒ If **NO** Section 7 criteria are affected, a 10CFR50.54(q) Evaluation is **NOT** required.
- ☐ If **ANY** Section 7 criteria are affected, go to Form 2 to perform a 10CFR50.54(q) Evaluation.

SECTION 6: SIGNATURE

Prepared by (Print Name) Tricia Granfors	Signature 	Date April 18, 2019
Reviewed by (Print Name) MARK FRITZ	Signature 	Date 4-18-19
SFAM Approval (Print Name) Mike Davis	Signature 	Date 4/19/19
CFAM Approval (Print Name) Dean Morgan	Signature 	Date 4/22/19

10CFR50.54(q) SCREENING FORM

Page 3 of 3

PCR/AR/NAMS No.: 2277166

Section 7: Are any of the following affected by this change? (Document in Section 4 for each change.)

No.	Planning Standards / Functions	Requirement	YES	NO
1.	Responsibility for emergency response is assigned..	50.47(b)(1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.	The response organization has the staff to respond and to augment staff on a continuing basis (i.e., 24/7 support) in accordance with the emergency plan.	50.47(b)(1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.	The process ensures that onshift emergency response responsibilities are staffed and assigned (including on-shift staffing study and assumptions)	50.47(b)(2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.	The process for timely augmentation of onshift staff is established and maintained.	50.47(b)(2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.	Arrangements for requesting and using offsite assistance have been made.	50.47(b)(3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.	State and local staff can be accommodated at the EOF in accordance with the emergency plan.	50.47(b)(3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7.	A standard scheme of emergency classification and action levels is in use.	50.47(b)(4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.	Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes after declaration of an emergency and providing follow-up notifications.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.	Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10.	The public ANS meets the design requirements of FEMA-REP-10, "Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants", or is compliant with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11.	Systems are established for prompt communication among principal emergency response organizations.	50.47(b)(6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12.	Systems are established for prompt communication to emergency response personnel.	50.47(b)(6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13.	Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway EPZ.	50.47(b)(7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14.	Coordinated dissemination of public information during emergencies is established.	50.47(b)(7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15.	Adequate equipment & facilities are maintained to support emergency response.	50.47(b)(8)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16.	Methods, systems, and equipment for assessment of radioactive releases are in use	50.47(b)(9)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17.	A range of public PARs is available for implementation during emergencies.	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18.	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.	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
19.	A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20.	The resources for controlling radiological exposures for emergency workers are established.	50.47(b)(11)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
21.	Arrangements are made for medical services for contaminated, injured individuals	50.47(b)(12)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
22.	Plans for recovery and reentry are developed.	50.47(b)(13)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
23.	A drill and exercise program (including radiological, medical, health physics, and other program areas) is established.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
24.	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.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
25.	Identified weaknesses are corrected.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
26.	Training is provided to emergency responders.	50.47(b)(15)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
27.	Responsibility for emergency plan development and review is established.	50.47(b)(16)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
28.	Planners responsible for emergency plan development and maintenance are properly trained.	50.47(b)(16)	<input type="checkbox"/>	<input checked="" type="checkbox"/>