

Susquehanna Steam Electric Station (SSES) License Amendment Request for Proposed Changes to Emergency Response Organization Staffing and Augmentation

Pre-Submittal Call Meeting
June 18, 2019



Agenda

- Purpose
- Emergency Plan Licensing Basis
- Proposed Changes
- Precedent
- Regulatory Requirements and Guidance
- Schedule
- Conclusion
- Questions

Purpose

To outline proposed Susquehanna Steam Electric Station (SSES) Emergency Plan changes and the considerations used in development of the License Amendment Request (LAR), including:

- Regulatory Requirements
- Regulatory Guidance
- Current NRC Staff Positions
- Recent NRC Approvals of Industry Submittals

Licensing Basis

- SSES Emergency Plan, approved by the NRC via Safety Evaluation Report (SER), dated March 24, 2003 changed from 30 and 60 minute ERO response to 60 and 90 minute response.
- The current SSES Emergency Plan maintains 60 and 90 minute response.
- The LAR includes an analysis of NUREG-0654 Table B-1 functions between the last approved and current revision.
- Proposed Emergency Plan changes will maintain 60 and 90 minute response.

Proposed Changes

- Remove references to performance of maintenance tasks on-shift.
- Reduce the number of augmented RP Technicians from 8 to 6.
- Remove augmented Chemistry position.
- Revise the definition of “facility activation” to describe TSC and OSC in terms of staffed and ready to assume command and control functions at an Alert or higher classification.

Proposed Changes (cont'd)

- Classification, Notification, Dose Assessment and PAR Determination remain at TSC.
- Extend response times for some TSC and OSC positions to 90 minutes.
- Require staffing of the EOF and JIC at an Alert or higher classification.
- Reduce the size of the augmented ERO to leverage efficiencies gained by consolidating command and control functions in the TSC.
- Administrative positions controlled via EPIPs.

Precedent

Safety Evaluations issued for the following:

- Point Beach (ML16118A154)
- Duane Arnold (ML17220A026)
- Monticello (ML17349A91)
- Prairie Island (ML17362A202)
- South Texas Project (ML18158A212)
- Sequoyah (ML18159A461)

Applicable Regulatory Requirements

- 10 CFR 50.47(b)
- 10 CFR 50.54(q)
- 10 CFR 50, Appendix E
- 10 CFR 50.90

Applicable Guidance Documents

- Regulatory Guide 1.219, "Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors," Revision 1
- Nuclear Regulatory Commission (NRC) Interim Staff Guidance NSIR/DPR-ISG-01, "Emergency Planning for Nuclear Power Plants"
- Nuclear Energy Institute (NEI) 10-05, "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities"
- NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1
- Regulatory Information Summary (RIS) 2016-10, "License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation"
- NRC Letter to NEI, "Alternative Guidance for Licensee Emergency Response Organizations"

Schedule

- Submit LAR by September 30, 2019
- Request approval within one year of submittal acceptance.
- Propose a 120-day implementation period

Conclusion

Based on the technical, functional, and staffing analyses performed, Susquehanna has concluded that the proposed changes:

- Maintain support for the required Emergency Plan functions
- Continue to ensure the protection of public health and safety
- Comply with applicable regulatory requirements

Questions

Questions?