

# 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?