

DOCKET NUMBER: 70-1257

LICENSE NUMBER: SNM-1227

LICENSEE: Framatome, Inc.  
2101 Horn Rapids Road  
Richland, WA 99354-0130

SUBJECT: SAFETY EVALUATION REPORT: APPROVAL OF  
EMERGENCY PLAN, VERSION 14.0 (ENTERPRISE  
PROJECT IDENTIFIER L-2019-EPR-0002)

## 1.0 BACKGROUND

By application dated March 15, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19078A297), Framatome, Inc. submitted changes to the site emergency plan for U.S. Nuclear Regulatory Commission (NRC) review and approval. The proposed changes would adjust the time required for event classification from 5 minutes to 15 minutes after observing that an emergency action level has been reached and two additional administrative changes that do not require NRC approval.

## 2.0 DISCUSSION

The NRC staff reviewed the changes from the current emergency plan, including the licensee's evaluation of the changes, to verify that the proposed Emergency Plan, Version 14.0, continues to meet the requirements contained in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 70. The licensee states that the 5 minutes has been too restrictive, and the 15 minutes is consistent with the requirements at other nuclear facilities.

Currently, there are no regulatory requirements for non-power reactor and materials licensees to assess, classify, and declare an emergency condition within 15 minutes. The requirements in 10 CFR 70.22(i)(3) state the licensee shall commit to notify the NRC operations center immediately after notification of the appropriate offsite response organizations and not later than one hour after the licensee declares an emergency. However, for nuclear power reactor licensees, the requirements in 10 CFR Part 50, Appendix E, Section IV.C.2, state in part:

...nuclear power reactor licensees shall establish and maintain the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an emergency action level has been exceeded and shall promptly declare the emergency condition as soon as possible following identification of the appropriate emergency classification level.

In the statements of consideration for Final Rule, "Enhancements to Emergency Preparedness Regulation," (76 Federal Register 72560; November 23, 2011), the NRC stated, in part:

...In 1995, the NRC found it necessary to publish Emergency Preparedness Position-2, "Emergency Preparedness Position (EPPOS) on Timeliness of

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Classification of Emergency Conditions,” to provide guidance to NRC staff in evaluating licensee performance in the area of timely classification. The NRC cited classification delays in actual events and exercises as the reason for issuing the guidance. The EPPOS-2 provided the NRC expectation that the classification should be made promptly following indications that conditions have reached an emergency action level (EAL) threshold and that 15 minutes was a reasonable goal for completing the classification once indications are available to the control room operators. The NRC based that conclusion on the belief that 15 minutes is a reasonable period of time for assessing and classifying an emergency once indications are available to cognizant personnel, and that a delay in classification for up to 15 minutes would have a minimal impact upon the overall emergency response and protection of the public health and safety....

Therefore, the request to change the timing for emergency classification from 5 minutes to 15 minutes after the availability of indications that an emergency action level has been exceeded is reasonable and would have a minimal impact upon the overall emergency response, and protection of the public health and safety.

Based on this analysis, the NRC staff concludes that the proposed change of the time required for event classification from 5 minutes to 15 minutes after observing that an emergency action level has been reached is acceptable.

### 3.0 ENVIRONMENTAL REVIEW

The changes requested by this amendment are administrative and organizational in nature. The provisions of 10 CFR Paragraph 51.22(c)(11) state that such actions are excluded from the requirement to perform an environmental review if certain criteria are met. The NRC staff finds that (i) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, (ii) there is no significant increase in individual or cumulative occupational radiation exposure, (iii) there is no significant construction impact, and (iv) there is no significant increase in the potential for or consequences from radiological accidents. Therefore, as authorized by 10 CFR 51.22(c)(11), neither an environmental impact statement nor an environmental assessment has been prepared for this amendment.

### 4.0 CONCLUSION

Based on the discussion above, the NRC staff concludes that the changes to the time required for event classification from 5 minutes to 15 minutes after observing that an emergency action level has been reached and other administrative changes are acceptable.

### 5.0 PRINCIPAL CONTRIBUTORS

Jeannette Arce, NSIR