



**M. CHRISTOPHER NOLAN**  
Vice President

**Nuclear Regulatory Affairs, Policy &  
Emergency Preparedness**  
526 South Church Street, EC-07C  
Charlotte, NC 28202

980-382-7426  
Chris.Nolan@duke-energy.com

Serial: RA-19-0427  
November 21, 2019

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 92**

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 92, which is effective November 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: L. Dudes, NRC Regional Administrator, NRC, Region II  
M. Fannon, NRC Senior Resident Inspector, HBRSEP, Unit No. 2  
M. Barillas, 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 #: 2289207		BNP	<input type="checkbox"/>	
		CNS	<input type="checkbox"/>	
		CR3	<input type="checkbox"/>	
		HNP	<input type="checkbox"/>	
5AD #: 2289016		MNS	<input type="checkbox"/>	
		ONS	<input type="checkbox"/>	
		RNP	<input checked="" type="checkbox"/>	
		GO	<input type="checkbox"/>	
Document and Revision		PLP-007 Robinson Emergency Plan Revision 92		
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	Old: Step 5.3.2.1. g	OAC Support The OAC Support position reports to the Assistant Emergency Coordinator. Key responsibilities include: • Monitor facility equipment (computer, communications, etc.) for proper operation  • Activate ERDS or confirm ERDS operation	Deleted	The following responsibility is duplicated under Step 5.3.2.1.g IT support: • Monitor facility equipment (computer, communications, etc.) for proper operation  The following responsibility is transferred under Step 5.3.2.1.g IT Support: • Activate ERDS or confirm ERDS operation.
2	New Step 5.3.2.1.g		IT Support The IT Support position reports to the Assistant Emergency Coordinator. Key responsibilities include: • Monitor facility equipment (computer, communications, etc.) for proper operation  • Activate ERDS or confirm ERDS operation.	The second bullet was transferred from Old step 5.3.2.1.g OAC Support to IT Support. Step renumbered
3	Page 86 Figure	OAC Support position	None	Removed position

	5.3.2-1 Technical Support Center ERO	block	Removed from table	
4	Page 92 Table 5.3.2-2 Augmented Staffing For Emergencies	OAC Support (TSC) 1	None Removed from table	Removed position
5	Step 5.3.2.4. i	<p>Logistics Lead (Near Site JIC)</p> <p>The Logistics Lead reports to the Near Site JIC Manager. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Coordinate ERO/facility shift turnover</li> <li>• Manage assigned group emergency response activities</li> <li>• Arrange for logistics support</li> <li>• Make staffing notifications</li> <li>• Coordinate JIC security and media badging</li> <li>• Prepare for facility activation (rooms, work area, equipment, etc.)</li> <li>• Determine current/projected staff needs</li> <li>• Provide administrative support for facility operation</li> </ul>	<p>Logistics Lead (Near Site JIC)</p> <p>The Logistics Lead reports to the Near Site JIC Manager. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Coordinate ERO/facility shift turnover</li> <li>• Manage assigned group emergency response activities</li> <li>• Arrange for logistics support</li> <li>• Make staffing notifications</li> <li>• Coordinate JIC security and media badging</li> <li>• Prepare for facility activation (rooms, work area, equipment, etc.)</li> <li>• Determine current/projected staff needs</li> <li>• Provide administrative support for facility operation</li> <li>• Coordinate distribution of news releases, statements and messages</li> <li>• Distribute forms, reports, etc. as needed</li> </ul>	<p>The following responsibilities were transferred from deleted Step 5.3.2.4.j Admin Support (Near JIC):</p> <ul style="list-style-type: none"> <li>• Coordinate distribution of news releases, statements and messages</li> <li>• Distribute forms, reports, etc. as needed</li> </ul>
6	Old Step 5.3.2.4. j	<p>Admin Support (Near Site JIC)</p> <p>The Admin Support position reports to the Logistics Lead. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Coordinate distribution of news releases, statements and messages</li> <li>• Prepare for facility activation (rooms, work</li> </ul>	Deleted	<p>The following responsibilities are duplicated under Step 5.3.2.4.i Logistics Lead:</p> <ul style="list-style-type: none"> <li>• Prepare for facility activation (rooms, work area, equipment, etc.)</li> <li>• Provide administrative support for facility operation</li> </ul>

		<p>area, equipment, etc.)</p> <ul style="list-style-type: none"> <li>• Provide administrative support for facility operation</li> <li>• Distribute forms, reports, etc. as needed</li> </ul>		<p>The following responsibilities were transferred under Step 5.3.2.4.i Logistics Lead:</p> <ul style="list-style-type: none"> <li>• Coordinate distribution of news releases, statements and messages</li> <li>• Distribute forms, reports, etc. as needed</li> </ul>
7	Old Step 5.3.2.4. I	<p>Registration Liaison (Near Site JIC)</p> <p>The Registration Liaison reports to the Logistics Lead. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Register personnel at the assigned location</li> <li>• Monitor facility entrance areas</li> <li>• Prepare for facility activation (rooms, work area, equipment, etc.)</li> </ul>	Deleted	Deleted Registration Liaison Position & functions. The same responsibilities are duplicated under the Media Center Coordinator in Step 5.3.2.4.g.
8	Page 87 Figure 5.3.2-4, Joint Information Center ERO	Admin Support and Registration Liaison block	None Removed from table	Removed position
9	Step 5.6.1	<p>Organizational Preparedness</p> <p>Organizational preparedness is maintained through an integrated training program that includes general orientation of all persons at the site and detailed training of individuals and groups required to perform specific functions and actions during an emergency condition. The training program provides initial training and annual continuing training by completion of Annual Requalification Checklist for designated positions to include drill or exercise participation. Initial and</p>	<p>Organizational Preparedness</p> <p>Organizational preparedness is maintained through an integrated training program that includes general orientation of all persons at the site and detailed training of individuals and groups required to perform specific functions and actions during an emergency condition. The training program provides initial training and annual continuing training as outlined in AD-EP-ALL-0500 Emergency Response Training. Classroom training may be provided as necessary.</p>	This change is to align with AD-EP-ALL-0500 and the fleet use of LMS to track requalification and not the use of an annual paper requalification checklist.

		<p>Requalification Checklists include a review of applicable procedures and job responsibilities. Classroom training may be provided as necessary.</p>		
10	Page 87 Figure 5.3.2-4, Joint Information Center ERO	Information Gathering Lead and News Writer (EOF) position box	Information Gathering Lead and News Writer (EOF) position box	<p>No change to the content of these boxes, the color of the boxes was changed from Blue to Pink to align with other boxes that contain Note 2.</p> <p>Editorial</p>

<b>Part II. Activity Previously Reviewed?</b> 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 checked="" type="checkbox"/>	10 CFR 50.54(q) Effectiveness Evaluation is not required. Enter justification below and complete Attachment 4, Part V.	Continue to Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part III
Bounding document attached (optional)			<input type="checkbox"/>	

<b>Part III. Editorial Change</b> Is this activity an editorial or typographical change only, such as formatting, paragraph numbering, spelling, or punctuation that does not change intent?  Justification:  The proposed change10 is 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.		Yes <input type="checkbox"/> No or Partially <input checked="" type="checkbox"/>	10 CFR 50.54(q) Effectiveness Evaluation is not required. Enter justification and complete Attachment 4, Part V.	Continue to Attachment 4, Part IV and address non editorial changes
---	--	--	--	---

Part IV. Emergency Planning Element and Function Screen (Reference Attachment 1, Considerations for Addressing Screening Criteria)		
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.		
1	10 CFR 50.47(b)(1) Assignment of Responsibility (Organization Control)	
1a	Responsibility for emergency response is assigned.	<input 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 on shift emergency response responsibilities are staffed and assigned	<input type="checkbox"/>
2b	The process for timely augmentation of on shift 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 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 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 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 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.		<input type="checkbox"/>
Justification:		
Change 9 provides specific guidance on how annual requalification documentation will be maintained. It does not change the requalification process or the training process. There is no change to the intent and there is no impact to the planning standards, therefore, there is no reduction in effectiveness.		<input checked="" type="checkbox"/>
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 #: 2289207	BNP	<input type="checkbox"/>		
	CNS	<input type="checkbox"/>		
	CR3	<input type="checkbox"/>		
	HNP	<input type="checkbox"/>		
5AD #: 2289016	MNS	<input type="checkbox"/>		
	ONS	<input type="checkbox"/>		
	RNP	<input checked="" type="checkbox"/>		
	GO	<input type="checkbox"/>		
Document and Revision	PLP-007 Robinson Emergency Plan Revision 92			
Part I. Description of Proposed Change:				
#	E-Plan or Procedure Section Reference	Current (Existing) Text	Proposed (Change) Text	Supporting Rationale (Justification) for Change
1	Old: Step 5.3.2.1. g	<p>OAC Support</p> <p>The OAC Support position reports to the Assistant Emergency Coordinator. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Monitor facility equipment (computer, communications, etc.) for proper operation</li> <li>• Activate ERDS or confirm ERDS operation</li> </ul>	Deleted	<p>The following responsibility is duplicated under Step 5.3.2.1.g IT support:</p> <ul style="list-style-type: none"> <li>• Monitor facility equipment (computer, communications, etc.) for proper operation</li> </ul> <p>The following responsibility is transferred under Step 5.3.2.1.g IT Support:</p> <ul style="list-style-type: none"> <li>• Activate ERDS or confirm ERDS operation.</li> </ul>
2	New Step 5.3.2.1.g		<p>IT Support</p> <p>The IT Support position reports to the Assistant Emergency Coordinator. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Monitor facility equipment (computer, communications, etc.) for proper operation</li> <li>• Activate ERDS or confirm ERDS operation.</li> </ul>	<p>The second bullet was transferred from Old step 5.3.2.1.g OAC Support to IT Support. Step renumbered</p>

3	Page 86 Figure 5.3.2-1 Technical Support Center ERO	OAC Support position block	None Removed from table	Removed position
4	Page 92 Table 5.3.2-2 Augmented Staffing For Emergencies	OAC Support (TSC) 1	None Removed from table	Removed position
5	Step 5.3.2.4. i	<p>Logistics Lead (Near Site JIC)</p> <p>The Logistics Lead reports to the Near Site JIC Manager. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Coordinate ERO/facility shift turnover</li> <li>• Manage assigned group emergency response activities</li> <li>• Arrange for logistics support</li> <li>• Make staffing notifications</li> <li>• Coordinate JIC security and media badging</li> <li>• Prepare for facility activation (rooms, work area, equipment, etc.)</li> <li>• Determine current/projected staff needs</li> <li>• Provide administrative support for facility operation</li> </ul>	<p>Logistics Lead (Near Site JIC)</p> <p>The Logistics Lead reports to the Near Site JIC Manager. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Coordinate ERO/facility shift turnover</li> <li>• Manage assigned group emergency response activities</li> <li>• Arrange for logistics support</li> <li>• Make staffing notifications</li> <li>• Coordinate JIC security and media badging</li> <li>• Prepare for facility activation (rooms, work area, equipment, etc.)</li> <li>• Determine current/projected staff needs</li> <li>• Provide administrative support for facility operation</li> <li>• Coordinate distribution of news releases, statements and messages</li> <li>• Distribute forms, reports, etc. as needed</li> </ul>	<p>The following responsibilities were transferred from deleted Step 5.3.2.4.j Admin Support (Near JIC):</p> <ul style="list-style-type: none"> <li>• Coordinate distribution of news releases, statements and messages</li> <li>• Distribute forms, reports, etc. as needed</li> </ul>
6	Old Step 5.3.2.4. j	<p>Admin Support (Near Site JIC)</p> <p>The Admin Support position reports to the Logistics Lead. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Coordinate distribution of news releases, statements and messages</li> <li>• Prepare for facility</li> </ul>	Deleted	<p>The following responsibilities are duplicated under Step 5.3.2.4.i Logistics Lead:</p> <ul style="list-style-type: none"> <li>• Prepare for facility activation (rooms, work area, equipment, etc.)</li> <li>• Provide administrative support for facility operation</li> </ul> <p>The following</p>

		activation (rooms, work area, equipment, etc.) • Provide administrative support for facility operation • Distribute forms, reports, etc. as needed		responsibilities were transferred under Step 5.3.2.4.i Logistics Lead: • Coordinate distribution of news releases, statements and messages • Distribute forms, reports, etc. as needed
7	Old Step 5.3.2.4. I	Registration Liaison (Near Site JIC) The Registration Liaison reports to the Logistics Lead. Key responsibilities include: • Register personnel at the assigned location • Monitor facility entrance areas • Prepare for facility activation (rooms, work area, equipment, etc.)	Deleted	Deleted Registration Liaison Position & functions. The same responsibilities are duplicated under the Media Center Coordinator in Step 5.3.2.4.g.
8	Page 87 Figure 5.3.2-4, Joint Information Center ERO	Admin Support and Registration Liaison block	None Removed from table	Removed position

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:

- PLP-007, Robinson Emergency Plan (Revision 0, dated 1982)
- PLP-007, Robinson Emergency Plan, Revision 91
- 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

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):

Changes 1-4 move the OAC Support responsibilities and procedure steps to IT Support in the TSC. This change is an efficiency gain. The OAC Support only defined responsibility was to turn on or verify ERDS was operating. That responsibility has been added to the IT Support Checklist. The IT Support will contact the on-call OAC Subject Matter Expert for any other OAC related issues. Responsibilities continue to be defined and timely augmentation of an OAC SME is available. The ERO continues to be staffed to augment initial response on a continuous basis. Thus, the Robinson Emergency Plans 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.

Changes 5-8 delete the Administrative Support position and the Registration Liaison position from the Joint Information Center (JIC) operations. The deletion of these positions requires some tasks from the deleted positions to move to other positions in the JIC. This change is due to personnel changes and efficiency gains. The tasks that were moved were only administrative in nature and not associated with ERO Key roles or Key Functions. The tasks that were moved to other positions in the JIC will not prevent activation of the facility or hinder operations to provide the public information on a periodic basis on how they will be notified and what their initial actions should be in an emergency. The ERO continues to be staffed and the responsibility for emergency response is assigned, and able to augment initial response on a continuous basis. Thus, the Robinson Nuclear Plant Emergency Plans 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.

Part IV. Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change (Address each function identified in Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part IV of associated Screen):

**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 2b, "The process for timely augmentation of on shift 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.

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

Proposed changes 1-4 move the OAC Support responsibilities and procedure steps to IT Support in the TSC. This change is an efficiency gain. The OAC Support position's only defined responsibility was to turn on or verify ERDS was operating. That responsibility has been added to the IT Support Checklist. The IT Support position will contact the on-call OAC Subject Matter Expert for any other OAC related issues. Responsibilities continue to be defined and timely augmentation of an OAC SME is available. The ERO continues to be staffed to augment initial response on a continuous basis and maintain the process for timely augmentation of on shift staff in accordance with the emergency plan.

Proposed changes 5-8 RNP originally approved Emergency plan do not speak to the specific positions that are being eliminated with this change. These positions were introduced to the Emergency Plan during the standard ERO implementation across the fleet in 2018. These positions were to support administrative tasks that were not associated with the Key functions of providing the public with information on a periodic basis on how they will be notified and what their initial actions should be in an emergency. These 2 specific positions were located at the near site JIC. Some tasks associated with these positions were redundant across multiple positions in the JIC. The other tasks that were not duplicated across other positions in the JIC have been moved to other positions in the JIC. These additional tasks for these other positions do not add additional burden nor do these tasks hinder other JIC position responsibilities.

Responsibilities for dissemination of public information during emergencies continue to be defined and timely. The ERO continues to be staffed to augment initial response on a continuous basis. Thus, there is no reduction in effectiveness of the Emergency Planning Functions of Assignment of Responsibility and Onsite Emergency Organization.

The changes described provide assurance that the normal plant operating organization and ERO have the ability and capability to:

- respond to an emergency;
- perform functions in a timely manner;

<ul style="list-style-type: none"> <li>effectively identify and take measures to ensure protection of the public health and safety; and</li> <li>effectively use response equipment and emergency response procedures.</li> </ul> <p>Thus, there is no reduction in effectiveness of the Robinson Emergency Plan.</p>			
<p>Part VI. Evaluation Conclusion.</p> <p>Answer the following questions about the proposed change.</p>			
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"/>	