



Pre-Application Public Meeting for Proposed License Amendment Request to Revise the STPEGS Emergency Plan

December 3rd, 2019



INTRODUCTIONS

Drew Richards

Licensing Supervisor

Ali (AJ) Albaaj

Licensing Engineer

Roger Aguilera

Emergency Response Services Director

Joe Enoch

Emergency Planning Manager

Desired Outcome

Provide a high-level review of the proposed STPEGS Emergency Plan submittal

Agenda

Regulatory Requirements &
Guidance

Description of Changes

Submittal Scope

Schedule

Regulatory Requirements & Guidance

- 10 CFR 50.47, “Emergency Plans”
- 10 CFR 50 Appendix E, “Emergency Planning and Preparedness for Production and Utilization Facilities”
- 10 CFR 50.54(q), “Conditions of Licenses - Emergency Plans”
- NUREG-0654/FEMA-REP-1, Rev 2, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants”
- NRC Regulatory Issue Summary 2016-10, “License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation”

Description of Changes

South Texas Project Electric Generating Station (STPEGS) is proposing a rewriting of the Emergency Plan (STPEGS EPlan) using NUREG-0654/FEMA-REP-1, Rev 2 (as updated by alternative guidance in June 12, 2018, NRC letter).

- Each NUREG-0654/FEMA-REP-1, Rev 2, evaluation criterion (planning element) will be explicitly stated, followed by a description of how the proposed STPEGS EPlan addresses that criterion
- Maintains 90 minute ERO Staff augmentation time (approved 7/19/19)
- Changes to Augmented ERO Positions

Submittal Scope

Differences from NUREG-0654 Rev. 2

- Differences between the proposed emergency plan, the current STPEGS EPlan, and NUREG-0654/FEMA-REP-1, Rev 2, will be justified to show continued adequate emergency preparedness.
 - Functional analysis performed to support staffing changes
 - RIS 2016-10 reviewed with respect to differences from NUREG-0654/FEMA-REP-1, Rev 2

Offsite Inclusion

- Offsite Response Agency concurrence letters will be included in the submittal.

Schedule

- Submit to the NRC by end of March 2020
- Request 12-month NRC review and 12-month implementation period



QUESTIONS?