



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

December 3rd, 2019



INTRODUCTIONS

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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?