



FEMA

January 13, 2020

Mr. Joseph Anderson  
Operating Reactors Licensing Outreach Branch  
Division of Preparedness and Response  
Office of Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

SUBJECT: Federal Emergency Management Agency (FEMA) Review of Responses to Requests for Additional Information (RAI) Pertaining to the Duane Arnold Energy Center (DAEC) Emergency Plan to Address the Permanently Defueled Condition

Dear Mr. Anderson:

Your letter dated April 30, 2019, requested FEMA's review of the proposed licensee staffing changes to determine any potential issues with the current FEMA approved state and local Radiological Emergency Preparedness Plans for the Duane Arnold Energy Center (DAEC). The proposed staffing changes to the DAEC Emergency Plan would eliminate specific on-shift and augmented emergency response organization (ERO) positions based on written certification to the U.S. Nuclear Regulatory Commission (NRC) under 10 CFR 50.82(a)(1) of the permanent cessation of reactor operation and transfer of spent fuel from the reactor vessel.

By letter dated July 29, 2019 (ADAMS Accession No. ML19213A323, attached), FEMA requested additional information on several questions based on FEMA Headquarters' and Region VII's review of the proposed ERO changes to the DAEC Emergency Plan. Subsequently, FEMA Region VII and Headquarters REP staff reviewed the licensee's responses to the NRC's Request for Additional Information (RAI) against the current FEMA approved REP Plans of the State of Iowa and local municipalities.

As a result of this detailed review, FEMA has determined that the proposed licensee ERO changes would have no adverse impacts that would preclude the effective implementation of state and local REP Plans or impact FEMA's future ability to make any determination of Reasonable Assurance for DAEC.

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If you have any questions or concerns pertaining to this response, please contact me at 202-212-1226 or Vanessa Quinn at 202-212-2849.

Sincerely,

Michael S. Casey, Ph.D.  
Director  
Technological Hazards Division

cc: Tom Morgan, RAC Chair, Region VII