

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602	
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Screening and Evaluation Number		Applicable Sites	
EREG #: <u>02304332</u>		BNP	<input type="checkbox"/>
		CNS	<input type="checkbox"/>
		CR3	<input type="checkbox"/>
		HNP	<input type="checkbox"/>
5AD #: <u>02304273</u>		MNS	<input checked="" type="checkbox"/>
		ONS	<input type="checkbox"/>
		RNP	<input type="checkbox"/>
		GO	<input type="checkbox"/>
Document and Revision	RP/0/A/5700/001 - NOTIFICATION OF UNUSUAL EVENT Revision 37		
Part I. Description of Proposed Change:			
<p>MNS Site EP Procedure RP/0/A/5700/001 (NOTIFICATION OF UNUSUAL EVENT) is being superseded to Fleet EP Procedure AD-EP-ALL-0111 (CONTROL ROOM ACTIVATION OF THE ERO) as part of the Common Control Room Procedures Fleet EP project.</p>			
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 <input type="checkbox"/> No <input checked="" type="checkbox"/>
Part II. Description and Review of Licensing Basis Affected by the Proposed Change:			
<p><u>Licensing Basis</u> McGuire Emergency Plan Change 2 (dated February 1981), additional information submitted April 3, 1981 and July 1, 1981, Revision 97-1 (dated April 1997), and Revision 11-3 (dated October, 2011)</p> <p>Current Emergency Plan Revision 19-01</p> <p>The differences in approved revisions and the current revisions of the Emergency Plans have been reviewed, and they have been determined to meet the regulatory requirements required during the course of revisions.</p>			

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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):

MNS Site EP Procedure RP/0/A/5700/001 (NOTIFICATION OF UNUSUAL EVENT) is being superseded to Fleet EP Procedure AD-EP-ALL-0111 (CONTROL ROOM ACTIVATION OF THE ERO) as part of the Common Control Room Procedures Fleet EP project.

This change continues to meet NRC requirements as described below:

10 CFR 50.47(b)(1) Assignment of Responsibility (Organization Control) – The responsibility for emergency response is maintained via procedure AD-EP-ALL-0111.

10 CFR 50.47(b)(2) Onsite Emergency Organization – The responsibility for onshift emergency response is maintained via procedure AD-EP-ALL-0111. The processes for augmenting the on-shift staff and notifying applicable Duke Energy are maintained via procedure AD-EP-ALL-0111. The requirements for turnover from the Control Room to the TSC and/or the EOF are maintained via procedure AD-EP-ALL-0111.

10 CFR 50.47(b)(5) Notification Methods and Procedures - The process for implementing notification of State and local governmental agencies is maintained via procedure AD-EP-ALL-0111.

10 CFR 50.47(b)(9) Accident Assessment - The processes for implementing assessment of radioactive releases is maintained via procedure AD-EP-ALL-0111.

10 CFR 50.47(b)(10) Protective Response – Protective actions are maintained for plant emergency workers during emergencies, including those for hostile action events, via procedure AD-EP-ALL-0111.

The differences in approved revisions and the current revisions of the Emergency Plans have been reviewed, and they have been determined to continue to meet NRC requirements as described in 10 CFR 50.47(b) and 10 CFR 50, Appendix E during the course of revisions.

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:

1. A description of the normal plant operating organization.
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;

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<p>b. Plant staff emergency assignments;</p> <p>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.</p> <p>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.</p> <p>The associated EP Function is Function 1a - Responsibility for emergency response is assigned.</p> <p>Program Elements NUREG-0654 Section II.A</p> <p>1.d. Each organization shall identify a specific individual by title who shall be in charge of the emergency response.</p> <p>1.e. Each organization shall provide for 24 hour per day emergency response, including 24-hour per day manning of communications links.</p> <p>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.</p> <p>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.</p> <p>10CFR50 Appendix E.IV.C. Activation of Emergency Organization</p> <p>1. The entire spectrum of emergency conditions that involve the alerting or activating of progressively larger segments of the total emergency organization shall be described. The communication steps to be taken to alert or activate emergency personnel under each class of emergency shall be described.</p> <p>Emergency action levels (based not only on onsite and offsite radiation monitoring information but also on readings from a number of sensors that indicate a potential emergency, such as the pressure in containment and the response of the Emergency Core Cooling System) for notification of offsite agencies shall be described. The existence, but not the details, of a message authentication scheme shall be noted for such agencies. The emergency classes defined shall include: (1) Notification of unusual events, (2) alert, (3) site area emergency, and (4) general emergency. These classes are further discussed in NUREG-0654/FEMA-REP-1.</p> <p>The associated EP Function is Functions are –</p> <p>2a - Process ensures that onshift emergency response responsibilities are staffed and assigned</p> <p>2b - The process for timely augmentation of onshift staff is established and maintained.</p> <p>Program Elements NUREG-0654 Section II.B</p> <p>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.</p> <p>2. Each licensee shall designate an individual as emergency coordinator who shall be on shift at all times and who shall have the authority and responsibility to immediately and unilaterally initiate any emergency actions, including providing protective action recommendations to authorities responsible for implementing offsite emergency measures.</p> <p>3. Each licensee shall identify a line of succession for the emergency coordinator position and identify the specific conditions for higher level utility officials assuming this function.</p> <p>4. Each licensee shall establish the functional responsibilities assigned to the emergency coordinator and shall</p>
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clearly specify which responsibilities may not be delegated to other elements of the emergency organization. Among the responsibilities which may not be delegated shall be the decision to notify and to recommend protective actions to authorities responsible for offsite emergency measures.

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.

6. Each licensee shall specify the interfaces between and among the onsite functional areas of emergency activity, licensee headquarters support, local services support, and State and local government response organization. This shall be illustrated in a block diagram and shall include the onsite technical support center and the operational support (assembly) center and the licensee's near-site Emergency Operations Facility (EOF)

7. Each licensee shall specify the corporate management, administrative, and technical support personnel who will augment the plant staff as specified in the table entitled "Minimum Staffing Requirements for Nuclear Power Plant Emergencies," (Table B-1) and in the following areas:

- 7.a. logistics support for emergency personnel, e.g., transportation, communications, temporary quarters, food and water, sanitary facilities in the field, and special equipment and supplies procurement;
- 7.b. technical support for planning and reentry/recovery operations;
- 7.c. management level interface with governmental authorities; and
- 7.d. release of information to news media during an emergency (coordinated with governmental authorities).

10CFR50.47(b)(5) Procedures have been established for notification, by the licensee, of State and local response organizations and for notification of emergency personnel by all organizations; the content of initial and followup messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.

10CFR50 Appendix E.IV.D. Notification Procedures

1. Administrative and physical means for notifying local, State, and Federal officials and agencies and agreements reached with these officials and agencies for the prompt notification of the public and for public evacuation or other protective measures, should they become necessary, shall be described. This description shall include identification of the appropriate officials, by title and agency, of the State and local government agencies within the EPZs.

...

3. A licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency. The licensee shall demonstrate that the appropriate governmental authorities have the capability to make a public alerting and notification decision promptly on being informed by the licensee of an emergency condition. Prior to initial operation greater than 5 percent of rated thermal power of the first reactor at a site, each nuclear power reactor licensee shall demonstrate that administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway EPZ. The design

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objective of the prompt public alert and notification system shall be to have the capability to essentially complete the initial alerting and initiate notification of the public within the plume exposure pathway EPZ within about 15 minutes. The use of this alerting and notification capability will range from immediate alerting and notification of the public (within 15 minutes of the time that State and local officials are notified that a situation exists requiring urgent action) to the more likely events where there is substantial time available for the appropriate governmental authorities to make a judgment whether or not to activate the public alert and notification system. The alerting and notification capability shall additionally include administrative and physical means for a backup method of public alerting and notification capable of being used in the event the primary method of alerting and notification is unavailable during an emergency to alert or notify all or portions of the plume exposure pathway EPZ population. The backup method shall have the capability to alert and notify the public within the plume exposure pathway EPZ, but does not need to meet the 15-minute design objective for the primary prompt public alert and notification system. When there is a decision to activate the alert and notification system, the appropriate governmental authorities will determine whether to activate the entire alert and notification system simultaneously or in a graduated or staged manner. The responsibility for activating such a public alert and notification system shall remain with the appropriate governmental authorities.

The associated EP Function is Function 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.

Program Elements NUREG-0654 Section II.E

1. Each organization shall establish procedures which describe mutually agreeable bases for notification of response organizations consistent with the emergency classification and action level scheme set forth in Appendix 1. These procedures shall include means for verification of messages. The specific details of verification need not be included in the plan.
2. Each organization shall establish procedures for alerting, notifying, and mobilizing emergency response personnel.
3. The licensee in conjunction with State and local organizations shall establish the contents of the initial emergency messages to be sent from the plant. These measures shall contain information about the class of emergency, whether a release is taking place, potentially affected population and areas, and whether protective measures may be necessary.
4. Each licensee shall make provisions for follow-up messages from the facility to offsite authorities which shall contain the following information if it is known and appropriate: ...

10 CFR 50.47(b)(9) Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

10CFR50 Appendix E.IV.B. Assessment Actions

1. The means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety. The emergency action levels shall be based on in-plant conditions and instrumentation in addition to onsite and offsite monitoring. By June 20, 2012, for nuclear power

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reactor licensees, these action levels must include hostile action that may adversely affect the nuclear power plant. The initial emergency action levels shall be discussed and agreed on by the applicant or licensee and state and local governmental authorities, and approved by the NRC. Thereafter, emergency action levels shall be reviewed with the State and local governmental authorities on an annual basis.

The associated EP Function is Function 9a - Methods, systems, and equipment for assessment of radioactive releases are in use.

Program Elements NUREG-0654 Section II.I

3. Each licensee shall establish methods and techniques to be used for determining:
 - 3.a. the source term of releases of radioactive material within plant systems. An example is the relationship between the containment radiation monitor(s) reading(s) and radioactive material available for release from containment.
 - 3.b. the magnitude of the release of radioactive materials based on plant system parameters and effluent monitors.
6. Each licensee shall establish the methodology for determining the release rate/projected doses if the instrumentation used for assessment are offscale or inoperable.
8. Each organization, where appropriate, shall provide methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways. This shall include activation, notification means, field team composition, transportation, communication, monitoring equipment and estimated deployment times.

10 CFR 50.47(b)(10) A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. Evacuation time estimates have been developed by applicants and licensees. Licensees shall update the evacuation time estimates on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

The associated EP Function is Function 10a - A range of public PARs is available for implementation during emergencies.

Program Elements NUREG-0654 Section II.J.

1. Each licensee shall establish the means and time required to warn or advise onsite individuals and individuals who may be in areas controlled by the operator, including:
 - 1.a. Employees not having emergency assignments;
 - 1.b. Visitors;
 - 1.c. Contractor and construction personnel; and
 - 1.d. Other persons who may be in the public access areas on or passing through the site or within the owner controlled area.

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

MNS Site EP Procedure RP/0/A/5700/001 (NOTIFICATION OF UNUSUAL EVENT) is being superseded to Fleet EP Procedure AD-EP-ALL-0111 (CONTROL ROOM ACTIVATION OF THE ERO) as part of the Common Control Room Procedures Fleet EP project.

Capability Assessment

This change continues to meet Emergency Plan requirements as described below:

Assignment of Responsibility (Organization Control) – The responsibility for emergency response is maintained via procedure AD-EP-ALL-0111. The change continues to provide for the assignment of individuals responsible for emergency response.

Onsite Emergency Organization – The responsibility for onshift emergency response is maintained via procedure AD-EP-ALL-0111. The processes for augmenting the on-shift staff and notifying applicable Duke Energy are maintained via procedure AD-EP-ALL-0111. The requirements for turnover from the Control Room to the TSC and/or the EOF are maintained via procedure AD-EP-ALL-0111. The change continues to provide the assignment of individuals responsible for onshift emergency response, the process for augmenting the on-shift staff and command and control turnover.

Notification Methods and Procedures - The process for implementing notification of State and local governmental agencies is maintained via procedure AD-EP-ALL-0111. The change continues to assure that State and local governmental agencies notifications are conducted.

Accident Assessment - The processes for implementing assessment of radioactive releases is maintained via procedure AD-EP-ALL-0111. The change continues to direct the assessment of radiological releases when occurring.

Protective Response – Protective actions are maintained for plant emergency workers during emergencies, including those for hostile action events, via procedure AD-EP-ALL-0111. The change continues to provide for notification of plant personnel and, when necessary, appropriate protective actions.

No action, function or responsibility has been removed from the guidance available to the Shift Manager/Emergency Coordinator.

Timeliness Assessment

There are no changes to the ERO augmentation, accident assessment (on shift dose assessment) or on-site protective actions time frames associated with this change.

There are no changes to the state and county notification time frame as notifications will continue to be made within 15 minutes of event declaration.

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<p>These changes continue to provide assurance that the Emergency Response Organization has the ability and capability to:</p> <ul style="list-style-type: none"> • respond to an emergency; • perform functions in a timely manner; • effectively identify and take measures to ensure protection of the public health and safety; and • effectively use response equipment and emergency response procedures. <p>Thus, there is no reduction in effectiveness of the Emergency Plan and these changes continue to meet NRC requirements, as described in 10 CFR 50.47(b) and 10 CFR 50, Appendix E.</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"/>	
<p>Part VII. Disposition of Proposed Change Requiring Prior NRC Approval</p>			
Will the proposed change determined to require prior NRC approval be either revised or rejected?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
<p>If No, then initiate a License Amendment Request in accordance 10 CFR 50.90, AD-LS-ALL-0002, Regulatory Correspondence, and AD-LS-ALL-0015, License Amendment Request and Changes to SLC, TRM, and TS Bases, and include the tracking number:_____.</p>			

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Part VIII. Signatures: EP CFAM Final Approval is required for changes affecting risk significant planning standard 10 CFR 50.47(b)(4) (i.e., Emergency Action Levels and Emergency Action Level Bases). If CFAM approval is NOT required, then mark the CFAM signature block as not applicable (N/A) to indicate that signature is not required.		
Preparer Name (Print): Barry Kimray	Preparer Signature: See CAS	Date: See CAS
Reviewer Name (Print): See CAS	Reviewer Signature: See CAS	Date: See CAS
Approver (Manager, Nuclear Support Services) Name (Print): See CAS	Approver Signature: See CAS	Date: See CAS
Approver (CFAM, as required) Name (Print): N/A	Approver Signature: N/A	Date: N/A
If the proposed activity is a change to the E-Plan, then initiate PRRs. If the proposed activity is a change to the E-Plan, then create two EREG General Assignments. If required by Section 5.6, Submitting Reports of Changes to the NRC, then create two EREG General Assignments.		<input type="checkbox"/>
<ul style="list-style-type: none"> One for EP to provide the 10 CFR 50.54(q) summary of the analysis, or the completed 10 CFR 50.54(q), to Licensing. 		<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> One for Licensing to submit the 10 CFR 50.54(q) information to the NRC within 30 days after the change is put in effect. 		<input checked="" type="checkbox"/>

QA RECORD