

APRIL 21, 2020, TELECONFERENCE REGARDING NRC OBSERVATIONS ON THE
MARCH 30, 2020, LICENSE AMENDMENT REQUEST TO REVISE THE EMERGENCY PLAN

STP NUCLEAR OPERATING COMPANY

SOUTH TEXAS PROJECT, UNITS 1 AND 2

DOCKETS 50-498 AND 50-499

By letter dated March 30, 2020, the STP Nuclear Operating Company submitted a license amendment request (LAR) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20091H586) to revise the South Texas Project Electric Generating Station (STPEGS) Emergency Plan based on guidance in NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support Nuclear Power Plants," Revision 2. The Nuclear Regulatory Commission (NRC) staff is conducting an acceptance review of the LAR, including comparing the proposed emergency plan to the current emergency plan (ADAMS Accession No. ML20099F480) and has identified the following observations/potential issues.

Issues/Potential Supplemental Information

- Section 3.4, "ERO [emergency response organization] Task Analysis," of the application should be revised to only identify non-minimum augmenting (support) ERO positions that are currently identified in the current STPEGS Emergency Plan and provide any justification for the elimination or moving those positions to emergency plan implementing procedures.
- Section 3.6, "Approved to Current E-Plan Comparison Analysis," of the application identifies nine reduction in effectiveness changes that were made by the licensee in previous revision of the STPEGS Emergency Plan. Is STPEGS requesting the NRC to approve plan changes that have already been implemented by licensee as not constituting a reduction in effectiveness?
- Section E, "Notification Methods and Procedures," of the proposed [STPEGS](#) Emergency Plan states:

During emergencies that may require the implementation of protective actions, the general public will be alerted by the PNS [Prompt Notification System], which consists of systems and methods as detailed in the FEMA (Federal Emergency Management Agency) PNS Design Report.

More detail is needed in the proposed Section E of the STPEGS Emergency Plan to address licensee requirements in Section IV.D.3 to Appendix E of 10 CFR Part 50. Simply referencing a FEMA Alert and Notification System Design Report is inadequate as previously discussed by NRC staff with industry.

Issues/Proposed Changes

- Elimination of one of two Shift Managers – Basis was previously used by the staff to approve the extension of command and control in the technical support center/emergency operations facility (TSC/EOF) from 60 minutes to 90 minutes. As such, proposed changes undercuts NRC basis for approving recently approved ERO changes.
- Elimination of maintenance technicians/maintenance supervision from on shift – Basis was used previously by the staff to approve the extension of engineering support in the TSC from 60 minutes to 90 minutes. As such, proposed changes undercuts NRC basis for approving recently approved ERO changes.