



TVA License Amendment Request
Revise Fleet Radiological Emergency Plan
Revised Requirement for On-Shift EMT and Onsite Ambulance
CNL-20-047

June 23, 2020



Agenda

- Meeting Purpose
- License Amendment Request (LAR) Overview
- Key Affected Planning Standards
- How Planning Standards Will Continue To Be Met
- LAR Schedule
- Conclusions
- Questions/Comments?



Meeting Purpose

Provide the NRC staff with a description of CNL-20-047, the proposed TVA Fleet Radiological Emergency Plan (REP) change to revise the need for an on-shift Emergency Medical Technician (EMT) and onsite ambulance, and to solicit staff feedback



LAR Overview

- Requests replacement of on-shift Emergency Medical Technician (EMT) coverage with an Emergency Medical Professional (who can be an Emergency Medical Responder, EMT, Advanced EMT, or Paramedic)
- Removes requirement for an onsite ambulance
- Identifies 15 specific changes to the REP that are assessed against the relevant Planning Standards



Key Affected Planning Standards

10 CFR 50.47(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.

- Impacted by revised medical staffing regarding EMTs



Key Affected Planning Standards

10 CFR 50.47(b)(12) - Arrangements are made for medical services for contaminated injured individuals.

- Impacted by revised medical staffing regarding EMTs
- Impacted by no longer crediting onsite ambulance



Key Affected Planning Standards

10 CFR 50.47(b)(14) - Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

- Impacted by no longer needing participation on onsite ambulance



How Planning Standards Will Continue To Be Met

10 CFR 50.47(b)(2)

- Site Emergency Response Organization will continue to have on-shift Emergency Medical Professionals consistent with the Planning Standard.



How Planning Standards Will Continue To Be Met

10 CFR 50.47(b)(12)

- On-shift Emergency Medical Professional can be either an EMR, EMT, Advanced EMT, or Paramedic. This exceeds NUREG-0654 standard for a First Aid capability.
- Unit Auxiliary Operator Fire Brigade Members are assigned the Advanced Fire Brigade Member curricula. This is consistent with NUREG-0654 standard for a First Aid capability.
- Ability to transport an injured individual from the Protected Area to an offsite ambulance is not impaired.



How Planning Standards Will Continue To Be Met

10 CFR 50.47(b)(14)

- Required exercises will continue to be performed without participation of the onsite ambulance



LAR Schedule

- Submittal expected in July 2020
- An expedited NRC review is requested
- Upon approval, the REP change will be implemented within 7 days



Conclusions

- REP Change LAR is scheduled to be submitted in July 2020
- LAR demonstrates that affected Planning Standards will continue to be met
- An expedited NRC approval is requested with implementation within 7 days



Questions/Comments?