



# **License Amendment Request for On-Shift ERO Staffing Reduction**

Pre-Submittal Meeting for:  
Wolf Creek Nuclear Operating Company (WCNOC),  
Wolf Creek Generating Station (WCGS)

**11/19/2020**

# Participants



- USNRC
- WCNOC

# Agenda



- Pre-Submittal Meeting Purpose
- Emergency Plan Licensing Basis
- Proposed Emergency Plan Changes
- LAR Format
- LAR Schedule
- Conclusions
- Questions?

# Pre-Submittal Meeting Purpose



- Establish communication with NRC staff in order to identify:
  - Applicable review criteria/standards
  - Level of detail and supporting analysis needed
  - Identification and applicability of precedents
  - Feasibility of desired schedule
- Outline proposed Emergency Plan changes
- Discuss LAR Development process and preliminary content

# Emergency Plan Licensing Basis



- Last NRC approved Emergency Plan is procedure AP 06-002, Revision 20 (License Amendment 220, dated April 1, 2019)
- Current Emergency Plan is procedure AP 06-002, Revision 21
- License Amendment 220 included an analysis of NUREG-0654, R/2, Table B-1 functions as implemented in the Emergency Plan

# Proposed Emergency Plan Changes



- Reduce on-shift Emergency Response Organization (ERO) staffing by two (2) Nuclear Station Operators (NSO) and one (1) RP Technician by:
  - Utilizing the Work Control Senior Reactor Operator (WCSRO) as the Emergency Notification System (ENS) Communicator and Off-site Communicator (OSC)
  - Reassigning Site Watch mitigation functions to other NSOs
  - Assigning Dose Assessment and Control Room Radiation Protection duties to one qualified Dose Assessor.

# Position 1: WCSRO as ENS/OSC Communicator



- WCSRO is now the dedicated Shift Technical Advisor (STA) separate from the other Shift Manager (SM) / Senior Reactor Operator (SRO) positions
- Eliminates dedicated STA position by allowing the STA functions to be combined with one or more of the required SM/SRO positions (Option 1 of GL 86-04)
- WCSRO would now be used as ENS/OSC communicator
- WCSRO will not have collateral duties while assigned ENS/OSC Communicator duties

# Position 1: WCSRO as ENS/OSC Communicator



- WCNO Tech Specs have already adopted the enabling STS wording to get rid of the separate title "Shift Technical Advisor"
- LAR patterned after Southern Nuclear Corporation (SNC) 2018/2019 LAR and NRC Safety Evaluation
- Change does not invalidate any conclusions reached in NRC's Safety Evaluation Report (SER) for WCNO Amendment 220
- Removes one NSO currently filling the ENS/OSC communicator position

## Position 2: Reassign Site Watch Mitigation Functions



- Site Watch NSO has no assigned emergency planning, firefighting, or collateral duties
- Site Watch is only required for “Mitigation”
- Previous addition of two Fire Brigade Members (FBM) as NSOs can perform the Site Watch “Mitigation” functions
- Optimization of these mitigation functions would not create a competing collateral duty or impact any emergency planning functions
- Removes one NSO emergency planning position

## Position 3: Dose Assessor/Rad Protection Position



- Chem Tech currently performs Dose Assessment in the Control Room
- Dose Assessor will be responsible for the Major Task of “Personnel Monitoring” in the Control Room
- Dose Assessor will be task qualified for the following basic RP duties:
  - Perform on-site radiation surveys;
  - Perform on-site contamination surveys;
  - Set up a step-off pad for access to the control room.
- This position will be titled On-Shift Dose Assessor
- Reduces on-shift staffing by one RP Tech

# LAR Format



- LAR follows NEI 06-02, “License Amendment Request (LAR) Guidelines”
- Enclosures/Attachments include:
  - Technical Justification
  - Functional analysis of Table B-1 Major Tasks
  - Summary table of Emergency Plan changes
  - Marked up copy of the Emergency Plan
  - Clean copy of the Emergency Plan
  - Table B-1 Comparative Chart
  - Commitments

# Regulatory Guidance



- RG 1.219, "Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors"
- 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"
- NSIR/DPR-ISG-01, "Interim Staff Guidance Emergency Planning for Nuclear Power Plants"
- RIS 2016-10, "License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation"
- NEI 10-05, "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities"
- NEI 12-01, "Guideline for Assessing Beyond Design Basis Accidents Response Staffing and Communications Capabilities"

# LAR Schedule



- Submittal of LAR by end of first quarter 2021
- Request approval by end of first quarter 2022
- Propose a 180-day implementation period



# Conclusions

- Proposed staffing continues to minimize impact of radiological emergencies and provides protection of public health and safety
- Supported by technical justification and functional analysis
- Revised Emergency Plan continues to meet §50.54(q)(2), §50 Appendix E, and the planning standards of §50.47(b)
- Draft on-shift staffing analysis completed to verify that remaining ERO positions were not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the Emergency Plan

# Questions

