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Serial: RA-22-0151
May 24, 2022

10 CFR 50.54(q)

United States Nuclear Regulatory Commission (NRC)
ATTN: Document Control Desk
Washington, DC 20555-0001

Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Docket Nos. 50-325, 50-324 / Renewed License Nos. DPR-71 and DPR-62

Catawba Nuclear Station, Unit Nos. 1 and 2
Docket Nos. 50-413, 50-414 / Renewed License Nos. NPF-35 and NPF-52

H. B. Robinson Steam Electric Plant, Unit No. 2
Docket No. 50-261 / Renewed License No. DPR-23

McGuire Nuclear Station, Unit Nos. 1 and 2
Docket Nos. 50-369, 50-370 / Renewed License Nos. NPF-9 and NPF-17

Oconee Nuclear Station, Unit Nos. 1, 2 and 3
Docket Nos. 50-269, 50-270, and 50-287 / Renewed License Nos. DPR-38, DPR-47, and DPR-55

Shearon Harris Nuclear Power Plant, Unit 1
Docket No. 50-400 / Renewed License No. NPF-63

SUBJECT: Duke Energy Common Emergency Plan, Revision 2, Summary of Changes

Ladies and Gentlemen:

In accordance with 10 CFR 50.54(q), Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC (collectively referred to as Duke Energy), are submitting a revision summary for the Duke Energy Common Emergency Plan (EP-ALL-EPLAN, Revision 2).

EP-ALL-EPLAN, Duke Energy Common Emergency Plan, is the Emergency Plan utilized by the Duke Energy Nuclear Fleet. The Common Emergency Plan is being revised, with changes to update frequency definitions as well as clarify drill information in Section N. These changes have been evaluated in accordance with 10 CFR 50.54(q) and have been determined to not result in a reduction in the effectiveness of the Emergency Plan. The Duke Energy Common Emergency Plan continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. In accordance with 10 CFR 50.54(q)(5), Attachment 1 includes a summary of analyses associated with the emergency plan changes.

This document contains no new regulatory commitments.

Should you have any questions concerning this letter, or require additional information, please contact Lee Grzeck, Fleet Licensing Manager (Acting), at (980) 373-1530.

Sincerely,



M. Christopher Nolan
Vice President – Nuclear Regulatory Affairs, Policy & Emergency Preparedness

Attachment 1: EP-ALL-EPLAN, Revision 2, 10 CFR 50.54(q)

cc: L. Dudes, Regional Administrator USNRC Region II
G. Smith, USNRC Senior Resident Inspector – BNP
J. D. Austin, USNRC Senior Resident Inspector – CNS
J. Zeiler, USNRC Senior Resident Inspector – HNP
G. A. Hutto, USNRC Senior Resident Inspector – MNS
J. Nadel, USNRC Senior Resident Inspector – ONS
M. Fannon, USNRC Senior Resident Inspector – RNP
L. Haeg, NRR Project Manager – BNP
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M. Mahoney, NRR Project Manager – HNP
J. Klos, NRR Project Manager – MNS
S. A. Williams, NRR Project Manager – ONS
T. E. Hood, NRR Project Manager – RNP
N. Jordan, NRR Project Manager - Duke Fleet

Attachment 1: EP-ALL-EPLAN, Revision 2, 10 CFR 50.54(q)

<< 10 CFR 50.54(q) Review Form >>

Section I: 10 CFR 50.54(q) Review Number: (EREg #):				2418363	
Applicable Sites and Applicability Determination # (5AD)					
■ BNP	2418304	■ CNS	2418305	■ HNP	2418306
■ MNS	2418307	■ ONS	2418308	■ RNP	2418309
Document #, EC #, or N/A		Revision # or N/A		Document or Activity Title	
EP-ALL-EPLAN		002		Duke Energy Common Emergency Plan	

Section II: Identify/Describe All Proposed Activities/Changes being Reviewed

Event or action, or series of actions that may result in a change to the emergency plan or affect the implementation of the emergency plan (Use attachments, or continue additional pages as necessary): Continue to **Section III**.

Activity/Changes:

EP-ALL-EPLAN, Duke Energy Common Emergency Plan, is the Emergency Plan utilized by the Duke Energy Nuclear Fleet. The Common Emergency Plan is being revised to change frequency definitions, as well as clarifying drill information in section N.

Change #	Section or Step #	Change From	Change to
1	Throughout	Old revision number, effective date, table of contents, revision summary, page numbers.	New revision number, effective date, updated table of contents, revision summary, and page numbers as a result of the changes to the document.
2	Section 1.0, page 6 first paragraph	The Duke Energy Common Emergency Plan was developed with the guidance of NUREG-0654, FEMA-REP-1, Revision 2, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." The Duke Energy Emergency Plan meets the emergency planning standards of 10 CFR 50.47(b), the requirements of Appendix E. Section II of the Duke Energy Emergency Plan is organized using the structure of NUREG-0654, Revision 2. That structure provides the cross-reference to the elements in the base document.	The Duke Energy Common Emergency Plan was developed with the guidance of NUREG-0654, FEMA-REP-1, Revision 2, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." The Duke Energy Emergency Plan meets the emergency planning standards of 10 CFR 50.47(b), and the requirements of 10 CFR 50 Appendix E. The Duke Energy Emergency Plan is organized using the structure of NUREG-0654, Revision 2. That structure provides the cross-reference to the elements in the base document.
3	Section 4.0, Criteria B.1.a, 2.a	Emergency Coordinator <ul style="list-style-type: none"> Supervise TSC activities. Approve Emergency Action Level (EAL) Classifications Authorize personnel dose extensions. 	Emergency Coordinator <ul style="list-style-type: none"> Supervise TSC activities. Classify and Declare Emergencies. Authorize personnel dose extensions.
4	Section 4.0, Criteria B.2.a, Table Header	<u>Transition of "Non Delegable" Responsibilities</u>	<u>Transition of Responsibilities</u>

Change #	Section or Step #	Change From	Change to
5	Section 8.0, Criteria F.1.a	Duke Energy Emergency Management Network (DEMNET)	Duke Emergency Management Network (DEMNET)
6	Section 8.0, Criteria F.1.b.1	Duke Energy Emergency Management Network (DEMNET)	Duke Emergency Management Network (DEMNET)
7	Section 9.0 Criteria G.5	Information is offered each calendar year to acquaint news media outlets with the overall emergency preparedness at Duke Energy nuclear sites and the methods for obtaining information during an emergency. The material includes information about the site, radiation effects, emergency response activities, points of contact, etc	Information is offered annually to acquaint news media outlets with the overall emergency preparedness at Duke Energy nuclear sites and the methods for obtaining information during an emergency. The material includes information about the site, radiation effects, emergency response activities, points of contact, etc
8	Section 16.0, Criteria N.3.e	10 CFR 50.54(hh)(2) Strategies Demonstration of the use of equipment, procedures, and strategies developed in compliance with 10 CFR 50.54(hh)(2).	10 CFR 50.155(b)(2) Strategies Demonstration of the use of equipment, procedures, and strategies developed in compliance with 10 CFR 50.155(b)(2).
9	Section 16.0, Criteria N.3.f	<div>N.3.f</div> <div>Dual Site Event. In accordance with the NRC approval for common EOF, an exercise requiring multi-site events and response is conducted once each cycle.</div> <p>The Duke Energy Common EOF will participate in a multi-site event scenario conducted as an exercise within each eight-year exercise cycle.</p> <p>The participating sites will be varied.</p>	Removed from this section, moved to N.4.l
10	Section 16.0, Criteria N.3.g	<div>N.3.g</div> <div>Minimum Staffing. In accordance with the NRC approval for common emergency plan, an exercise with only minimum augmenting ERO response (no participation of non-minimum augmenting ERO personnel) is conducted once each cycle.</div> <p>A minimum staffing response exercise that requires facility activation, full transfer of responsibilities from the Main Control Room and demonstration of event assessment and response activities will be performed within each eight-year exercise cycle.</p> <p>The participating site will be varied.</p>	Removed from this section, moved to N.4.m
11	Section 16 Criteria N.4.a	Each Duke Energy nuclear site will conduct an emergency medical drill once per calendar year.	Each Duke Energy nuclear site will conduct an emergency medical drill annually.
12	Section 16 Criteria N.4.d	Each Duke Energy nuclear site will conduct an environmental monitoring drill once per calendar year.	Each Duke Energy nuclear site will conduct an environmental monitoring drill annually.
13	Section 16.0, New criterion N.4.l, moved from N.3.f	Added to this section, changed from "an exercise" to "a drill" in the criteria and description.	<div>N.4.l</div> <div>Dual Site Event. In accordance with the NRC approval for common EOF, a drill requiring multi-site events and response is conducted once each cycle.</div> <p>The Duke Energy Common EOF will participate in a multi-site event scenario conducted as a drill within each eight-year exercise cycle.</p> <p>The participating sites will be varied.</p>
14	Section 16.0, New criterion N.4.m, moved from N.3.g	Added to this section, changed from "an exercise" to "a drill" in the criteria.	<div>N.4.m</div> <div>Minimum Staffing. In accordance with the NRC approval for common emergency plan, a drill with only minimum augmenting ERO response (no participation of non-minimum augmenting ERO personnel) is conducted once each cycle.</div> <p>A minimum staffing response drill that requires facility activation, full transfer of responsibilities from the Main Control Room and demonstration of event assessment and response activities will be performed within each eight-year exercise cycle.</p> <p>The participating site will be varied.</p>
15	Section 17 Criteria O.1.a	Duke Energy offers emergency response training annually (once per calendar year) for those offsite organizations that may be called upon to provide onsite assistance (such as fire and ambulance) in the event of an emergency. They are invited to attend training applicable to the Duke Energy site or sites where they could provide assistance.	Duke Energy offers emergency response training annually for those offsite organizations that may be called upon to provide onsite assistance (such as fire and ambulance) in the event of an emergency. They are invited to attend training applicable to the Duke Energy site or sites where they could provide assistance.

Change #	Section or Step #	Change From	Change to
16	Section 18.0, Criteria P.1	Initial training of the EP staff consists of classroom training, reading for awareness, and reading with discussion and is documented in the Nuclear Generation Department EP Staff Training Plan Position Specific Guide.	Initial training of the EP staff consists of classroom training, reading for awareness, and reading with discussion and is documented in the Nuclear Generation Department EP Staff Training procedure.
17	Attachment 3	AD-EP-ALL-0002 - NRC Regulatory Assessment Performance Indicator Guideline Emergency Preparedness Cornerstone - P AD-EP-ALL-0100 - Emergency Response Organization (ERO) - B,H AD-EP-ALL-0102 - WebEOC - E,F AD-EP-ALL-0400 - Emergency Communication Equipment - F AD-EP-ALL-0602 - Emergency Plan Change Screening and Effectiveness Evaluations 10 CFR 50.54(q) - P AD-EP-ALL-0901 - Determining the Status of Offsite Emergency Preparedness - P AD-EP-NGO-0403 - Common EOF Data Coordinator Equipment Startup and Troubleshooting - H	Removed from document
18	Attachment 3	AD EP ALL 0407, Verification of Emergency Operations Facility Communication Equipment Operation and Equipment Supply Inventory	AD-EP-ALL-0407, Emergency Operations Facility Surveillance
19	Attachment 3	Added to document	AD-EP-ALL-0902 - Offsite Interface - C AD-EP-PWR-0206 - Core Damage Assessment During an Emergency - I
20	Attachment 4, Appendix 1, Definitions	Annual: At least once per 366 days. A maximum allowable extension which shall not exceed 25% of the specified interval (+91 days). NOTE: This does not apply to scheduling of offsite agency training, MOU/LOA review, Emergency Classification Level or Emergency Action Level schemes. This Offsite agency training, and reviews identified are conducted during the calendar year based on the availability of the offsite agencies.)	Annual or Annually: Once per calendar year.
21	Attachment 4, Appendix 1, Definitions	Biennial or Biennially: At least once per 731 days. A maximum allowable extension which shall not exceed 25% of the specified interval (+182). (NOTE: This does not apply to the scheduling of biennial exercises. An exercise can occur at any time during the second calendar year after the previous exercise.)	Biennial or Biennially: Once per two calendar years.

Change #	Section or Step #	Change From	Change to
22	Attachment 4, Appendix 1, Definitions	Every 5 Years: at least once per 1825 days. A maximum allowable extension which shall not exceed 25% of the specified interval.	Removed from document
23	Attachment 4, Appendix 1, Definitions	Monthly: At least once per 31 days. A maximum allowable extension which shall not exceed 25% of the specified interval (+7 days).	Monthly: Once per calendar month.
24	Attachment 4, Appendix 1, Definitions	Onsite: the OCA of a commercial NPP	Onsite: the OCA of a commercial NPP (as defined by the Offsite Agencies). For the Proposes of the Onsite Field Monitoring Technician, Onsite is defined as Inside the Protected Area of a NPP.
25	Attachment 4, Appendix 1, Definitions	Quarterly: At least once per 92 days. A maximum allowable extension which shall not exceed 25% of the specified interval (+23 days). (NOTE: This does not apply to quarterly siren test that are conducted during the Biennial Exercise at the request of offsite agencies. In this situation the maximum interval may be exceeded; however, the siren test will be conducted during the applicable quarter.).	Quarterly: Once per calendar quarter. Calendar Quarters are defined as January-March, April - June, July - September and October-December.
26	Attachment 4, Appendix 1, Definitions	Semi Annual or Semiannually: At least once every 184 days. A maximum allowable extension which shall not exceed 25% of the specified interval (+46 days).	Semi Annual or Semiannually: Twice per calendar year. Twice defined as once in the first six months of the calendar year, and again, once in the second six months of the calendar year.
27	Attachment 4, Appendix 1, Definitions	Threat and Hazard Identification and Risk Assessment (THIRA): a comprehensive guide to identifying and addressing risks and impacts through the whole community approach; this is a joint effort between Federal, state, local, and tribal governments, and territorial organizations.	Removed from document
28	Attachment 4, Appendix 1, Definitions	Triennial: At least once every three years. A maximum allowable extension which shall not exceed 25% of the specified interval (+274 days).	Removed from document
29	Attachment 4, Appendix 1, Definitions	Weekly: At least once every 7 days. A maximum allowable extension which shall not exceed 25% of the specified interval (+2 days) (NOTE Weekly siren test may exceed this interval if requested/required by offsite agencies.)	Weekly: Once in a calendar week. The week defined as Monday through Sunday.

Section III: Description and Review of Licensing Basis Affected by the Proposed activity or Change:

List all emergency plan sections that were reviewed for this activity by number and title.

IF THE ACTIVITY IN ITS ENTIRETY IS AN EMERGENCY PLAN CHANGE, EAL CHANGE OR EAL BASIS CHANGE, Enter Licensing Basis affected by the change and continue to **Section VI**.

Licensing Basis:

- EP-ALL-EPLAN, Duke Energy Common Emergency Plan, Rev 0
- EP-BNP-EPLAN-ANNEX, Duke Energy Brunswick Emergency Plan Annex, Rev 0
- EP-CNS-EPLAN-ANNEX, Duke Energy Catawba Emergency Plan Annex, Rev 0
- EP-HNP-EPLAN-ANNEX, Duke Energy Harris Emergency Plan Annex, Rev 0
- EP-MNS-EPLAN-ANNEX, Duke Energy McGuire Emergency Plan Annex, Rev 0
- EP-ONS-EPLAN-ANNEX, Duke Energy Oconee Emergency Plan Annex, Rev 0
- EP-RNP-EPLAN-ANNEX, Duke Energy Robinson Emergency Plan Annex, Rev 0

Current Emergency Plans:

- EP-ALL-EPLAN, Duke Energy Common Emergency Plan, Rev 1
- EP-BNP-EPLAN-ANNEX, Duke Energy Brunswick Emergency Plan Annex, Rev 1
- EP-CNS-EPLAN-ANNEX, Duke Energy Catawba Emergency Plan Annex, Rev 1
- EP-HNP-EPLAN-ANNEX, Duke Energy Harris Emergency Plan Annex, Rev 1
- EP-MNS-EPLAN-ANNEX, Duke Energy McGuire Emergency Plan Annex, Rev 1
- EP-ONS-EPLAN-ANNEX, Duke Energy Oconee Emergency Plan Annex, Rev 1
- EP-RNP-EPLAN-ANNEX, Duke Energy Robinson Emergency Plan Annex, Rev 1

The differences in the approved and the current revision of the Emergency Plans have been reviewed, and they have been determined to meet the regulatory requirements required during the course of revisions.

Section IV: Ability to Maintain the Emergency Plan.

Answer the following questions related to impact on the ability to maintain the Emergency Plan. Continue to Section V.

1. Do any of the elements of the proposed activity change information or intent contained in the Emergency Plan?	Yes <input type="checkbox"/> No <input type="checkbox"/>
2. Do any elements of the proposed activity change the process or capability for alerting or notifying the public as described in the FEMA-approved Alert and Notification System Design Report?	Yes <input type="checkbox"/> No <input type="checkbox"/>
3. Do any elements of the proposed activity change the Evacuation Time Estimate results?	Yes <input type="checkbox"/> No <input type="checkbox"/>
4. Do any elements of the proposed activity change the On-Shift Staffing Analysis results?	Yes <input type="checkbox"/> No <input type="checkbox"/>
5. Does the Proposed activity require a change to the Emergency Plan Programmatic Description?	Yes <input type="checkbox"/> No <input type="checkbox"/>

If Question 5 was answered yes, and the document being reviewed is NOT the Emergency Plan, then exit this review until the Emergency Plan change is complete or the proposed change is modified to not change the Emergency Plan Programmatic Description.

Section IV conclusion:

- ☐ If questions 1-5 in **Section IV** marked NO, then complete **Section V**.
☐ If any question 1-5 of **Section IV** marked yes, then continue at **Section VI**.

Section V: Maintaining the Emergency Plan Conclusion.	
<p>The questions in Section IV do not represent the total of all conditions that may cause a change to or impact the ability to maintain the emergency plan. Originator and reviewer signatures in Section XIV document that a review of all elements of the proposed change have been considered for their impact on the ability to maintain the emergency plan and their potential to change the emergency plan.</p>	
<p>1. Provide a brief conclusion below that describes how the conditions, as described in the emergency plan, are maintained with this activity.</p>	
<p>2. Select the box below when the review completes all actions for all elements of the activity and no 10CFR50.54 screening or evaluation is required for any element. Continue to Section XIV.</p>	
<p><input type="checkbox"/> <input type="checkbox"/> I have completed a review of this activity in accordance with 10CFR50.54(q)(2) and determined that the effectiveness of the emergency plan is maintained. This activity does not make any changes to the emergency plan. No further actions are required to screen or evaluate this activity in accordance with 10CFR50.54(q)(3).</p>	

Conclusion:

Section VI: Activity Previously Reviewed?		
Is this activity fully bounded by an NRC approved 10CFR50.90 submittal or Alert and Notification System Design Report?		
<input type="checkbox"/>	Yes	10 CFR 50.54(q) Evaluation is not required. Identify bounding source document below and continue to Section XIV .
<input checked="" type="checkbox"/>	No	Continue to Section VII .
<input type="checkbox"/>	Partially	If PARTIALLY , identify bounding source document and list changes bounded by the approved 10 CFR 50.90 or Alert and Notification System Design Report below. Changes not bound by the approved 10 CFR 50.90 or Alert and Notification System Design Report (i.e., part requiring further review). Continue the review in Section VII .

Bounding source document and list of bounded changes:

Section VII: Editorial Changes		
<input type="checkbox"/>	Yes	All Activities/Changes identified in Section II are editorial/typographical changes such as formatting, paragraph numbering, spelling, or punctuation that does not change intent.
<input type="checkbox"/>	No	None of the Activities/Changes listed in Section II are editorial/typographical changes. Continue to Section VIII .
<input checked="" type="checkbox"/>	Partially	Some Activities/Changes are editorial/typographical.
<p>If Yes is checked, Identify the activities/changes listed in Section II that are editorial/typographical changes and provide justification below. Continue to Section XII.</p> <p>If Partially is checked, Identify the activities/changes listed in Section II that are editorial/typographical changes and provide justification below. Continue to Section VIII for changes not identified as editorial.</p>		

Justification:

The change(s) below are defined as editorial in accordance with AD-EP-ALL-0602, and do not change the intent of the Emergency Plan as written.

Change 1, updates the revision number, effective date, table of contents, revision summary, and page numbers as a result of the changes to the document. These changes do not change intent of the Emergency Plan and are considered editorial.

Changes 5 and 6 update the title of "DEMNET". DEMNET is an acronym used by Duke Energy that stands for Duke Emergency Management Network, a system used to contact the states and counties during declared emergencies. When creating the Common Emergency Plan the word "Energy" was added to the name erroneously. This change corrects that title of the system and aligns to the title of the procedure. There are no changes of intent. This change is editorial because it corrects the name of the title of the procedure without any other changes.

Section VIII: Emergency Planning Element and Function Screen <i>(Utilize Reg Guide 1.219 and Attachment 1, Additional Regulatory Guidance References for additional assistance)</i> Does any of Proposed Activities/Changes Identified in Section I impact any of the following, including program elements from NUREG-0654/FEMA REP-1 Section II? If yes check appropriate box.		
1	10 CFR 50.47(b)(1) Assignment of Responsibility (Organization Control)	
1a	Responsibility for emergency response is assigned.	<input checked="" type="checkbox"/>
1b	The response organization has the staff to respond and to augment staff on a continuing basis (24-7 staffing) in accordance with the emergency plan.	<input type="checkbox"/>
2	10 CFR 50.47(b)(2) Onsite Emergency Organization	
2a	Process ensures that on shift emergency response responsibilities are staffed and assigned	<input type="checkbox"/>
2b	The process for timely augmentation of onshift staff is established and maintained.	<input type="checkbox"/>
3	10 CFR 50.47(b)(3) Emergency Response Support and Resources	
3a	Arrangements for requesting and using off site assistance have been made.	<input type="checkbox"/>
3b	State and local staff can be accommodated at the EOF in accordance with the emergency plan.	<input type="checkbox"/>
4	10 CFR 50.47(b)(4) Emergency Classification System	RS
4a	A standard scheme of emergency classification and action levels is in use. (Requires V/V (Attachment 3) and final approval of Screen and Evaluation by EP CFAM)	<input type="checkbox"/>
5	10 CFR 50.47(b)(5) Notification Methods and Procedures	RS
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.	<input type="checkbox"/>
5b	Administrative and physical means have been established for alerting and providing prompt instructions to public within the plume exposure pathway.	<input type="checkbox"/>
5c	The public ANS meets the design requirements of FEMA-REP-10, Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants, or complies with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter	<input type="checkbox"/>
6	10 CFR 50.47(b)(6) Emergency Communications	
6a	Systems are established for prompt communication among principal emergency response organizations.	<input type="checkbox"/>
6b	Systems are established for prompt communication to emergency response personnel.	<input type="checkbox"/>
7	10 CFR 50.47(b)(7) Public Education and Information	
7a	Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway emergency planning zone (EPZ).	<input type="checkbox"/>
7b	Coordinated dissemination of public information during emergencies is established.	<input type="checkbox"/>
8	10 CFR 50.47(b)(8) Emergency Facilities and Equipment	
8a	Adequate facilities are maintained to support emergency response	<input type="checkbox"/>
8b	Adequate equipment is maintained to support emergency response.	<input type="checkbox"/>
9	10 CFR 50.47(b)(9) Accident Assessment	RS
9a	Methods, systems, and equipment for assessment of radioactive releases are in use.	<input type="checkbox"/>
10	10 CFR 50.47(b) (10) Protective Response	RS
10a	A range of public PARs is available for implementation during emergencies.	<input type="checkbox"/>
10b	Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.	<input type="checkbox"/>

10c	A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.	<input type="checkbox"/>
10d	KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public.	<input type="checkbox"/>
11	10 CFR 50.47(b) (11) Radiological Exposure Control	
11a	The resources for controlling radiological exposures for emergency workers are established.	<input type="checkbox"/>
12	10 CFR 50.47(b) (12) Medical and Public Health Support	
12a	Arrangements are made for medical services for contaminated, injured individuals.	<input type="checkbox"/>
13	10 CFR 50.47(b) (13) Recovery Planning and Post-Accident Operations	
13a	Plans for recovery and reentry are developed.	<input type="checkbox"/>
14	10 CFR 50.47(b) (14) Drills and Exercises	
14a	A drill and exercise program (including radiological, medical, health physics and other program areas) is established.	<input checked="" type="checkbox"/>
14b	Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills are assessed via a formal critique process in order to identify weaknesses.	<input type="checkbox"/>
14c	Identified weaknesses are corrected.	<input type="checkbox"/>
15	10 CFR 50.47(b) (15) Emergency Response Training	
15a	Training is provided to emergency responders.	<input type="checkbox"/>
16	10 CFR 50.47(b) (16) Emergency Plan Maintenance	
16a	Responsibility for emergency plan development and review is established.	<input checked="" type="checkbox"/>
16b	Planners responsible for emergency plan development and maintenance are properly trained.	<input checked="" type="checkbox"/>
Section VIII: Conclusion		
<p><input checked="" type="checkbox"/> If any Section VIII criteria are checked, document the basis for conclusion below for any changes that are more than editorial, however not impacted by any of the identified criteria in Section VIII and continue the 50.54(q) Review in Section IX.</p> <p><input type="checkbox"/> If no Section VIII criteria are checked, 10CFR50.54(q)(3) Evaluation is NOT required. Document justification below for any changes that are more than editorial and continue to Section XIV.</p>		

Justification for changes that are more than editorial, however, not impacted by any of the identified criteria in Section VIII:

Change 2 updates the first paragraph on page 6 of section 1.0. The changes update grammar and provide clarity of how the Duke Energy Common Emergency Plan was structured. "Section II" in this paragraph was deleted because it referred to the "section II" of the common Emergency Plan. This statement is meant for the entire Duke Energy Common Emergency Plan, and not just section II. The revised words clearly fix that error. Additionally, "10 CFR 50" was added before "Appendix E" to update the reference for clarity. These updates do not change intent of the Emergency Plan. These changes only add clarifying information to the introduction of the Duke Energy Emergency Plan.

Change 8 updates the criteria of Section 16.0 N.3.e. When NUREG-0654 Revision 2 was approved and endorsed, the NRC wanted emergency plans to have guidance regarding beyond design basis events as specified in a draft of 10 CFR 50.54(hh)(2). Later the NRC approved placement of the draft 50.54(hh)(2) guidance in 10 CFR 50.155. This is documented in NRC accession number ML19023A038 for more detail. This change updates the referenced regulation to match the intent of NUREG-0654 Revision 2. Since the change does not describe how Duke Energy meets a function within the Emergency Plan, and only updates the document to match the location of the guidance on beyond design basis events, there is not a reduction in effectiveness. The Emergency Plan now references the corrected document to meet the guidance.

Change 18 updates the name of the EOF surveillance document. There were 2 EOF surveillance documents prior to the implementation of the common Emergency Plan. AD-EP-ALL-0407, Emergency Operations Facility Surveillance superseded those documents. This change updates the title of the surveillance only, and not the content of the document.

Changes 22, 27 and 28 remove definitions from the Emergency Plan that are not used by the emergency preparedness staff, or emergency response organization (ERO). Removing the definitions of "Every 5 Years", "Threat and Hazard Identification and Risk Assessment (THIRA)", and "Triennial" were standard definitions used in the guidance document when creating the Duke Energy Common Emergency Plan. These definitions are not used in the common Emergency Plan or procedures used by the EP staff or ERO; therefore, removing them from the definitions section of the Emergency Plan is acceptable.

Change 24 updates the definition of "Onsite" to include a caveat. The standard definition from the guidance document for "Onsite" is used to help the Offsite Response Organizations (OROs) define the Owner Controlled Area (OCA) of a nuclear Power plant, however, the NRC required Duke Energy to staff an Onsite Field Monitoring Technician when approving the Duke Energy Common Emergency Plan. Additional clarifying information added for what "Onsite" means for the Onsite Field Monitoring Technician, helps the EP staff and ERO understand how "Onsite" is defined by the OROs, and how Duke Energy defines "Onsite" for Field Monitoring Technicians.

The proposed changes above do not affect any planning standards. There is no reduction in effectiveness of the Duke Energy Common Emergency Plan as a result of the changes above and they require no further evaluation.

<i>Section IX: Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change</i>

Copy each emergency planning standard, function and program element affected by the proposed change that was identified as applicable in Section VIII . Continue to Section X .

List affected Emergency Planning Standards, Functions, and Program Elements:

Applicable Planning Standard

10 CFR 50.47(b)(1) Assignment of Responsibility/Organizational Control

The regulation at 10 CFR 50.47(b)(1) states the following:

“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.”

Applicable planning functions

The applicable emergency planning function identified for this planning standard:

(1) Responsibility for emergency response is assigned.

Applicable sections of Appendix E to 10 CFR Part 50

IV.A.2 of Appendix E to 10 CFR Part 50

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;*
- b. Plant staff emergency assignments;*
- 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.*

Informing criteria appear in Section II.N of NUREG-0654

A.1.a - The organizations having an operational role specify their concept of operations and relationship to the total effort.

A.1.c - Each organization identifies the individual, by title/position, who will be in charge of the emergency response.

Applicable Planning Standard

10 CFR 50.47(b)(14)—Drill and Exercise Program

The regulation at 10 CFR 50.47(b)(14) states the following:

“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.”

Applicable planning functions

The applicable emergency planning function identified for this planning standard:

(2) Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills, are assessed via a formal critique process to identify weaknesses.

Applicable sections of Appendix E to 10 CFR Part 50 (in part)

Sections IV.F.2 of Appendix E to 10 CFR Part 50 provide supporting requirements.

2. The plan shall describe provisions for the conduct of emergency preparedness exercises as follows: Exercises shall test the adequacy of timing and content of implementing procedures and methods, test emergency equipment and communications networks, test the public alert and notification system, and ensure that emergency organization personnel are familiar with their duties.³

a. A full participation ⁴ exercise which tests as much of the licensee, State, and local emergency plans as is reasonably achievable without mandatory public participation shall be conducted for each site at which a power reactor is located. Nuclear power reactor licensees shall submit exercise scenarios under § 50.4 at least 60 days before use in a full participation exercise required by this paragraph 2.a

b. Each licensee at each site shall conduct a subsequent exercise of its onsite emergency plan every 2 years. Nuclear power reactor licensees shall submit exercise scenarios under § 50.4 at least 60 days before use in an exercise required by this paragraph 2.b. The exercise may be included in the full participation biennial exercise required by paragraph 2.c. of this section. In addition, the licensee shall take actions necessary to ensure that adequate emergency response capabilities are maintained during the interval between biennial exercises by conducting drills, including at least one drill involving a combination of some of the principal functional areas of the licensee's onsite emergency response capabilities. The principal functional areas of emergency response include activities such as management and coordination of emergency response, accident assessment, event classification, notification of offsite authorities, assessment of the onsite and offsite impact of radiological releases, protective action recommendation development, protective action decision making, plant system repair and mitigative action implementation. During these drills, activation of all of the licensee's emergency response facilities (Technical Support Center (TSC), Operations Support Center (OSC), and the Emergency Operations Facility (EOF)) would not be necessary, licensees would have the opportunity to consider accident management strategies, supervised instruction would be permitted, operating staff in all participating facilities would have the opportunity to resolve problems (success paths) rather than have controllers intervene, and the drills may focus on the onsite exercise training objectives.

Informing criteria appear in Section II.N of NUREG-0654

There is no applicable informing criteria from NUREG 0654 for the specific drills discussed in the activity of changes. These drills were requirements that the NRC provided Duke Energy when approving the Duke Energy Common Emergency Plan.

Applicable Planning Standard

10 CFR 50.47(b)(16)—Emergency Plan Maintenance

The regulation at 10 CFR 50.47(b)(16) states the following:

"Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained."

Applicable planning functions

Two emergency planning functions have been identified for this planning standard:

- (1) Responsibility for emergency plan development and review is established.*
- (2) Planners responsible for emergency plan development and maintenance are properly trained.*

Applicable sections of Appendix E to 10 CFR Part 50

Appendix E to 10 CFR Part 50 does not contain any supporting requirements for this planning standard.

Informing criteria appear in Section II.P of NUREG-0654

P.1 - The training program, including initial training and periodic retraining, of individuals responsible for the planning effort is described.

P.7 - An appendix containing a listing by title of the procedures required to maintain and implement the emergency plan is included. The listing includes the section(s) of the emergency plan to be implemented by each procedure.

Section X: Describe How the Proposed Change Complies with Relevant Emergency Preparedness Regulation(s) and Previous Commitment(s) Made to the NRC

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). Address each Planning Standard identified in **Section IX. Continue to Section XI.**

Justification:

Change 3 revises the wording of the responsibilities of the Emergency Coordinator. Previous wording stated that the Emergency Coordinator "Approves" emergency action level classifications. This is an incomplete description of their role. The Emergency Coordinator Classifies and Declares Emergencies. The new wording makes this clear. Primary responsibilities for emergency response by the nuclear facility licensee have been specifically established.

Change 4 changes the title of a table within the Emergency Plan from Transition of "Non Delegable" Responsibilities to Transition of Responsibilities. This table was not intended to designate non-delegable duties and the title could be misleading. Specifically, NRC Notifications are delegable because anyone in the facility may communicate with the NRC. The revised title clarifies this intent. Non-delegable responsibilities continue to be listed above this table in the body of the criteria. Those non-delegable duties are "Event Classification", "PARs for the general public", and "Notification of offsite authorities". Primary responsibilities for emergency response by the nuclear facility licensee have been specifically established.

The changes above do not reduce the authority and responsibility of persons filling key positions to perform their emergency assignments. Therefore, the changes continue to comply with 10 CFR 50.47(b)(1).

Changes 9, 10, 13 and 14 move 2 criteria for drills and exercises to another section of the Emergency Plan and revises wording within the criteria and the response from "exercise" to "drill". The 2 criteria in question are not from any guidance listed in NUREG 0654 Revision 2. A criterion for a minimum staffing demonstration was proposed by the NRC during the submittal and approval process of the Duke Energy Common Emergency Plan to have Duke Energy demonstrate a drill that did not include all ERO staffing (Minimum and full ERO staffing) in the Duke Energy facilities.

The second criterion in question is for Duke Energy to perform a dual site demonstration. NSIR/DPR-ISG-0, NRC INTERIM STAFF GUIDANCE, EMERGENCY PLANNING FOR NUCLEAR POWER PLANTS states (in part) *"Prior to the initial operation of a co-located or consolidated EOF and in at least one drill or exercise per exercise cycle thereafter the EOF staff will demonstrate the ability to perform the additional co-located or consolidated EOF functions set forth in Subsection 4.1."* (subsection 4.1 list the functions of the EOF). Duke Energy maintains a 6-site Emergency Operations Facility (EOF); therefore, Duke Energy must *"effectively responding to and coordinating response efforts for events occurring simultaneously at more than one site for a co-located or consolidated EOF."* As stated in the ISG this can be demonstrated in a "drill or exercise".

These two (2) criteria were added to the Duke Energy Common Emergency Plan within the "Exercise" section of the Emergency Plan. The proposed changes move these criteria to the "drill" section of the Emergency Plan and remove the word "exercise" from the criteria and the criteria responses. For Duke Energy, "exercise" implies the biennial NRC-graded, or off-year exercise as stated in 10 CFR-50 Appendix E. These criteria are not required to be listed as one of the required exercises in Appendix E. Revising the wording of these criteria and the response allows these criteria to be performed by the ERO as drills at any time during the exercise cycle, with or without the play of the offsite agencies. This also allows for greater frequency of performance for the entire ERO to gain proficiency. Shifting these demonstrations to drills will have minimal affect to the play of the offsite agencies because the functions are the same for the Duke Energy ERO. If multiple Events were to occur, multiple teams populate the EOF to allow each ERO team to communicate with the corresponding offsite agency. Minimum staff functions remain the same for offsite agencies as if the full EOF ERO had responded. Periodic exercises continue to be conducted to evaluate major portions of emergency response capabilities, periodic drills continue to be conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills continue to be corrected. Therefore, the changes continue to comply with 10 CFR 50.47(b)(14).

Change 16 removes a specific name of a document, "Position Specific Guide", and replaces those words with the more generic words of "Training Procedure". EP staff is not a "position" as part of the ERO as this statement implies. The position specific guide title for the EP staff will be changed so that there is no confusion or misunderstandings with the qualification process of an EP staff member from that of an ERO member. The proposed change does not introduce changes in the scope or frequency of training and performance enhancement opportunities for emergency preparedness management and staff. Responsibilities for plan development and review and for distribution of Emergency Plans continue to be established, and planners are properly trained. Therefore, the change continues to comply with 10 CFR 50.47(b)(16).

Change 17 removes documents from table P.7.1 (attachment 1) that lists the Emergency Plan Implementing Procedures (EPIPs). The procedures described below do not implement any portion of the Duke Energy Emergency Plan and should not be considered EPIPs.

- AD-EP-ALL-0002, NRC Regulatory Assessment Performance Indicator Guideline Emergency Preparedness Cornerstone describes the data and calculations for assessing the Duke Energy Emergency Preparedness cornerstone performance indicators (PI) in the Nuclear Regulatory Commission's (NRC) power reactor licensee assessment process using the current revision of NEI 99-02, Regulatory Assessment Performance Indicator Guideline and NRC Reactor Oversight Process Performance Indicator Approved Frequently Asked Questions. AD-EP-ALL-0002 does not provide instructions for accomplishing any provisions within the Emergency Plan.
- AD-EP-ALL-0100, Emergency Response Organization (ERO) provides standards and expectations for the Duke Energy Emergency Response Organization (ERO). AD-EP-ALL-0100 does not provide instructions for accomplishing any provisions within the Emergency Plan.
- AD-EP-ALL-0102, WebEOC provides maintenance and guidance to WebEOC Administrators to maintain, test, and administer WebEOC. AD-EP-ALL-0102 does not provide instructions for accomplishing any provisions within the Emergency Plan.
- AD-EP-ALL-0400, Emergency Communication Equipment is a guide for the sites in developing their instructions on the use of Iridium Satellite Phones and Government Emergency Telephone System (GETS) Cards. AD-EP-ALL-0400 does not provide instructions for accomplishing any provisions within the Emergency Plan.
- AD-EP-ALL-0602, Emergency Plan Change Screening and Effectiveness Evaluations 10 CFR 50.54(q) provides a consistent approach in complying with 10 CFR 50.54(q)(3) when making changes to emergency plans without prior NRC approval. The 10 CFR 50.54q program is needed to administratively control the change evaluation program but is not part of Duke Energy's response to an emergency, nor does it implement any planning standards. AD-EP-ALL-0602 does not provide instructions for accomplishing any provisions within the Emergency Plan.
- AD-EP-ALL-0901, Determining the Status of Offsite Emergency Preparedness provides guidance to Site Emergency Preparedness personnel to determine the status of site Emergency Preparedness (EP) capabilities after a natural disaster, to support FEMA Disaster Initiated Review Standard Operating Guide. AD-EP-ALL-0901 does not provide instructions for accomplishing any provisions within the Emergency Plan.
- AD-EP-NGO-0403, Common EOF Data Coordinator Equipment Startup and Troubleshooting, provided general information that is typically provided by the Duke Energy 24-hour IT help desk or in ERO position checklists. AD-EP-NGO-0403 does not provide any additional instructions for accomplishing any provisions within the Emergency Plan.

The Emergency Plan continues to list the correct procedures that support implementation of the common Emergency Plan. Responsibilities for plan development and review and for distribution of emergency plans continue to be established, and planners are properly trained. Therefore, the change continues to comply with 10 CFR 50.47(b)(16).

Change 19 adds documents to table P.7.1 (attachment 1) that lists the Emergency Plan Implementing Procedures (EPIPs). The procedures described below are considered EPIPs and are being added to the table of EPIPs.

- AD-EP-ALL-0902, Offsite interface is being added as it supports the general review of Memorandums of Understanding and Letters of agreements between Duke Energy and applicable Offsite agencies. Specifically, this procedure supports section "C" of the Emergency Plan. AD-EP-ALL-0902 does provide instructions for accomplishing provisions within the Emergency Plan.
- AD-EP-PWR-0206, Core Damage Assessment During an Emergency, is being added as it supports determining core damage assessment capabilities within the fission product barrier table of the Emergency Action Levels (EALs). Specifically, this procedure supports section "I", Accident Assessment, of the Emergency Plan. AD-EP-PWR-0206 provides instructions for accomplishing provisions within the Emergency Plan.

Changes 7, 11, 12, 15, 20, 21, 23, 25, 26 and 29 update frequency definitions and align wording in the Emergency Plan with the updated definitions. The updated definitions remove a "grace period" from the frequency definition that allowed the frequency to go beyond the time by no more than 25%. For example, an annual required frequency could go beyond 365 days for another 91 days, or biennial frequency could go beyond 732 days for another 182 days. These grace periods could allow the user to perform the action fewer times overall. Removing the grace periods within these definitions ensures that the action is performed within the required frequency (Weekly; within the week, Monthly; within the month, Quarterly; 1 time in each quarter, Annual; once in the calendar year, etc.). The revision to the frequency definitions provide clarification to the user and eliminates guess work determining when actions are required to be performed. As a result of the changes in frequency definitions, criterion wording is revised to align to the new "annual" or "annually" definition. Some of the criteria use the words "Once per calendar year", or "each calendar year". These words were removed and replaced with annually or removed all together for consistency throughout the Emergency Plan. The changes continue to meet the letter and intent of the regulation of performance frequencies for the given actions.

Periodic exercises continue to be conducted to evaluate major portions of emergency response capabilities, periodic drills continue to be conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills continue to be corrected. Therefore, the changes continue to comply with 10 CFR 50.47(b)(14). Responsibilities for plan development and review and for distribution of emergency plans continue to be established and planners are properly trained. Therefore, the change continues to comply with 10 CFR 50.47(b)(16)

<i>Section XI: Description of Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions</i>

Address each function identified in Section IX . <i>Continue to Section XII.</i>

Justification:

Change 3 revises the wording of the responsibilities of the Emergency Coordinator. Previous wording stated that the Emergency Coordinator "Approves" emergency action level classifications. This is an incomplete description of their role. The Emergency Coordinator Classifies and Declares Emergencies. The new wording makes this clear.

Change 4 changes the title of a table within the Emergency Plan from Transition of "Non Delegable" Responsibilities to Transition of Responsibilities. This table was not intended to designate non delegable duties and the title could be misleading. Specifically, NRC Notifications are delegable because anyone in the facility may communicate with the NRC. The revised title clarifies this intent. Non delegable responsibilities continue to be listed above this table in the body of the criteria. Those non delegable duties are "Event Classification", "PARs for the general public", and "Notification of offsite authorities".

The changes above do not reduce the authority and responsibility of persons filling key positions to perform their emergency assignments. Responsibility for the emergency response remains assigned.

Changes 9, 10, 13 and 14 move two criteria for drills and exercises to another section of the Emergency Plan and revises wording within the criteria and the response from "exercise" to "drill". The two criteria in question are not from any guidance listed in NUREG 0654 Revision 2. A criterion for a minimum staffing demonstration was proposed by the NRC during the submittal and approval process of the Duke Energy Common Emergency Plan to allow Duke Energy to not include all ERO staffing (Minimum and full ERO staffing) in the Duke Energy Common Emergency Plan.

The second criterion in question is for Duke Energy to perform a dual site demonstration. NSIR/DPR-ISG-0, NRC INTERIM STAFF GUIDANCE, EMERGENCY PLANNING FOR NUCLEAR POWER PLANTS states (in part) "*Prior to the initial operation of a co-located or consolidated EOF and in at least one drill or exercise per exercise cycle thereafter the EOF staff will demonstrate the ability to perform the additional co-located or consolidated EOF functions set forth in Subsection 4.1.*" (subsection 4.1 list the functions of the EOF). Duke Energy maintains a six site Emergency Operations Facility (EOF), therefore, Duke Energy must "effectively responding to and coordinating response efforts for events occurring simultaneously at more than one site for a co-located or consolidated EOF." As stated in the ISG this can be demonstrated in a "drill or exercise".

These two (2) criteria were added to the Duke Energy Common Emergency plan within the "Exercise" section of the Emergency Plan. The proposed changes move these criteria to the "drill" section of the Emergency Plan and remove the word exercise from the criteria and the criteria responses. For Duke Energy, "exercise" implies the annual graded, or off year exercise as stated in 10 CFR-50 Appendix E. These criteria are not required as listed as one of the required exercises in Appendix E. Revising the wording of these criteria and the response allows these criteria to be performed by the ERO as drills at anytime during the exercise cycle, without the play of the offsite agencies. This also allows for greater frequency of performance for the entire ERO to gain proficiency. Shifting these demonstrations to drills will have minimal affect to the play of the offsite agencies because the functions are the same for the Duke Energy ERO. If multiple Events were to occur, multiple teams populate the EOF to allow each ERO team to communicate with the corresponding offsite agency. Minimum staff functions remain the same for offsite agencies as if the full EOF ERO had responded. The proposed changes do not reduce the challenge to ERO personnel to the extent that they are not provided adequate opportunities over the exercise planning cycle to practice key functional areas and major tasks, including the use of the plan, procedures, and equipment associated with those functions and tasks. A drill and exercise program is maintained. Drills, exercises, and training evolutions continue to provide performance opportunities to develop, maintain, and demonstrate key skills, and continue to be assessed via a formal critique process to identify weaknesses.

Change 16 removes a specific name of a document, "Position Specific Guide," and replaces those words with the more generic words of "Training Procedure." EP staff is not a "position" as part of the ERO as this statement implies. The position specific guide title for the EP staff will be changed so that there is no confusion or misunderstandings with the qualification process of an EP staff member from that of an ERO member. The proposed change does not introduce changes in the scope or frequency of training and performance enhancement opportunities for emergency preparedness management and staff. Planners responsible for Emergency Plan development and maintenance continue to be properly trained, and responsibility for Emergency Plan development and review is maintained.

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- AD-EP-PWR-0206, Core Damage Assessment During an Emergency, is being added as it supports assessment capabilities determining Core Damage within the fission product barrier table of the Emergency Action Levels (EALs). Specifically, this procedure supports section "I" of the Emergency Plan. AD-EP-PWR-0206 does provide instructions for accomplishing provisions within the Emergency Plan.

The Emergency Plan continues to list the correct procedures that support implementation of the common Emergency Plan.

Changes 7, 11, 12, 15, 20, 21, 23, 25, 26 and 29 update frequency definitions and align wording in the Emergency Plan with the updated definitions. The definition updates remove a "grace period" from the frequency definition that allowed the frequency to go beyond the time by no more than 25%. For example, an annual required frequency could go beyond 365 days for another 91 days, or biennial frequency could go beyond 732 days for another 182 days. These grace periods could allow the user to perform the action fewer times overall. Removing the grace periods within these definitions ensures that the action is performed within the required frequency (Weekly; within the week, Monthly; within the month, Quarterly; 1 time in each quarter, Annual; once in the calendar year, etc.). The revision to the frequency definitions provide clarification to the user and eliminates guess work determining when actions are required to be performed. As a result of the changes in frequency definitions, criterion wording is revised to align to the new "annual" or "annually" definition. Some of the criteria use the words "Once per calendar year", or "each calendar year". These words were removed and replaced with annually or removed all together for consistency throughout the Emergency Plan. The changes continue to meet the letter and intent of the regulation of performance frequencies for the given actions.

The proposed changes 7, 11, 12, 15, 20, 21, 23, 25, 26 and 29 do not create a decrease in the scope, periodicity, or independence of the performance of emergency preparedness program reviews or requirements and do not increase the amount of time necessary to put changes into effect to needed Emergency Plan and supporting procedures identified as corrective actions for identified plan deficiencies and ERO weaknesses.

The proposed changes do not reduce the effectiveness of the Duke Energy Emergency Plan. These changes continue to provide assurance that the Emergency Response Organization has the ability and capability to:

- 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.

These changes continue to meet NRC requirements, as described in 10 CFR 50.47(b) and 10 CFR 50, Appendix E as well as the requirements of the Duke Energy Common Emergency Plan and Site's specific Emergency Plan annexes as written and approved.

Section XII: Evaluation Conclusion	
Answer the following questions about the proposed change:	
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"/>
Section XII: Conclusion	
Questions 1, 2 and 3 are answered YES, complete step below to create a General CAS assignment, and then continue on to Section XIV and implement change(s).	<input checked="" type="checkbox"/>
General CAS assignment created - Licensing submit changes in accordance with 10 CFR 50.4(b)(5)(ii) within 30 days of change implementation	<input checked="" type="checkbox"/>
Questions 1 or 2 or 3 are answered NO, complete Sections XIII and Section XIV .	<input type="checkbox"/>