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Columbia Emergency Plan License Amendment Request NRC Pre-Submittal Meeting

Agenda

- Introductions and Opening Remarks
- Regulatory Requirements and Guidance
- License Amendment Request Overview
- Closing Remarks
- Current Schedule

Introductions and Opening Remarks

- Introductions
 - Nuclear Regulatory Commission
 - Energy Northwest
 - Contingency Management Consulting Group
- Opening Remarks
- Purpose of Pre-Submittal Meeting

Regulatory Requirements and Guidance

- 10 CFR 50.47, “Emergency Plans”
- 10 CFR 50, Appendix E, “Emergency Planning and Preparedness for Production and Utilization Facilities”
- 10 CFR 50.54(q), “Conditions of Licenses – Emergency Plans”
- 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”
- NRC Regulatory Issue Summary 2016-10, “License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation

License Amendment Request Overview

- Approval of new Columbia Emergency Plan Revision 69 requested
- This revision establishes an updated licensing basis using NUREG-0654/FEMA-REP-1, Revision 2, and RIS 2016-10
- Proposed revision complies with 10 CFR 50.47(b)(2) and 10 CFR 50, Appendix E

License Amendment Request Overview

- Submittal content will include:
 - Technical Evaluation
 - Proposed Columbia Emergency Plan
 - Offsite Response Organization concurrence letters

License Amendment Request Overview

- Changes to the proposed Emergency Plan:
 - Staffing changes to align with NUREG-0654
 - New formatting to align with NUREG-0654

Important to Note

The Columbia on-shift staffing will continue to support the approved 90-minute augmentation time

License Amendment Request Overview

- Proposed TSC/OSC deviations include:
 - Reduced Minimum Staff Emergency Director Positions
 - Transfer of responsibilities occurs directly to the EOF Emergency Director
 - No TSC Dose Assessor Minimum Staff Position
 - Transfer of responsibilities occurs directly to the EOF Dose Assessor
 - Single Fix-it-Now (FIN) Supervisor Position
 - Oversight to all work groups provided by experienced leader

License Amendment Request Overview

- Proposed EOF deviations include:
 - No IT Lead Positions
 - Dedicated EOF Telecom Manager
 - 24/7 coverage with build-in redundant communication systems
 - No Onsite Field Monitoring Team Driver
 - Onsite air sampling performed on foot or from a utility vehicle source
 - No Security Liaison Minimum Staff Position
 - Security-related activities coordinated by two on-shift positions

Closing Remarks

- Columbia LAR follows precedence
 - Duke Energy, ML20247J468
 - STP, ML20090B745
- Limited deviations
- On-shift Staffing Analysis not changing
- Currently approved response time remains the same

Current Schedule

- Submittal 2nd half of December 2023
- Audit/RAI dates outside of February-March 2024 preferable due to a scheduled graded exercise
- Approval requested within 12 months



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