



Pre-Submittal Meeting: Emergency Plan License Amendment Request.

#### **Agenda**

- Introduction and Opening Remarks
- Regulatory Requirements and Guidance
- License Amendment Request Overview
- Schedule
- Closing Questions and Remarks

#### Introductions

- Introductions
  - -Nuclear Regulatory Commission
  - Cooper Nuclear Station
  - Contingency Management Consulting Group

Opening Remarks

#### **Purpose**

- The purpose of this meeting is to discuss a proposed license amendment request (LAR) for the Cooper Nuclear Station (CNS)
- The proposed license amendment would revise the CNS Emergency Plan.

#### Regulatory Requirements & 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

- Approval of proposed Cooper Nuclear Station Emergency Plan requested.
- This revision establishes an updated licensing basis using NUREG-0654/FEMA-REP-1, Revision 2, and RIS 2016-10
- Proposed revision complies with 10CFR50.47(b) and 10CFR50, Appendix E

- Submittal content will include:
  - Enclosure 1: Change Evaluation
  - Enclosure 2: Proposed Cooper Nuclear StationEmergency Plan
  - Enclosure 3: Offsite Response Organization (ORO)
    concurrence letters
  - Posting of LAR bases and analysis files
- Changes to the proposed Emergency Plan:
  - Staffing changes to align with NUREG-0654
  - New format and content to align with NUREG-0654

## Proposed deviations include:

- Dose Assessment Collateral Duty Assigned to On-Shift Radiological/Chemistry Personnel
- No Minimum Staff Technical Support Center (TSC)
  Emergency Director Position
- No Minimum Staff TSC ORO Communicator Position
- No Minimum Staff TSC Dose Assessor
- No dedicated Minimum Staff Onsite Field Monitoring Team (FMT) Technician Position
- -Single Maintenance Supervisor Position
- No Minimum Staff Onsite FMT Driver

- Proposed deviations continued:
  - –TSC Emergency Notification System Communicator at 90 minutes
  - Operational Support Center Maintenance at 90 minutes
  - Emergency Operations Facility (EOF)
    Operations/Emergency Operating Procedures
    Advisor (Classification Advisor) at 90 minutes
  - -EOF Offsite Communicator at 90 minutes
  - EOF Dose Assessor at 90 minutes

#### **Schedule**

- Submit to NRC July 2024
- Estimated 1-yr NRC review time from acceptance



# Closing Questions & Remarks



