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PASSPORT DOCUMENT

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Page: 1



Item	Facility	Type	Sub	Document Number / Title	Sheet	Revision	Doc Date	Copy #	Media	Copies
* 0001	MP	PROC	EP	EPDI 03 DECREASE IN EFFECTIVENESS 10CFR50.54 (Q) DETERMINATIONS		003			P	01

Marked (*) documents require your acknowledgement.

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A045

01/27/00
Approval Date

01/31/00
Effective Date

Document Action Request

SPG#

Initiated By: Scott McCain Date: 6/20/00 Department: EPSD Ext.: 3757

Document No.: EPDI-03 Rev. No.: 003 Minor Rev.: _____

Title: Decrease in Effectiveness 10 CFR 50.54(g) Determination

Reason for Request (attach commitments, CRs, ARs, OEs etc)

Address CR M3-98-5167, improve evaluation process, and specify SORC review requirements.

Continued

Instructions:

None

Continued

TPC

Interim

Approval (1) Plant Mngt Staff Member Print/Sign/Date (2) SM/SRO/CFH on Unit Print/Sign/Date

Procedure Request/Feedback Disposition

Priority: Perform Now Perform Later - See Comments Rejected - See Comments

Activity: Revision Minor Revision Cleanup Rev Biennial Review Cancellation

See DC-GDL01 for guidance

TPC OTC Place in VOID

Edit Corr.:>

Plant Mngt Staff Member - Approval

Comments: None

RI/DPC Print Name and Date

Continued

Reviews	Print	Sign	Date	SQR Qualified			✓ If Comments
				Yes	No	Dept.	
Internal <input checked="" type="checkbox"/>	D. Alois	<i>Dan Alois</i>	6/21	<input type="checkbox"/>	<input type="checkbox"/>	EPSD	<i>Not Approved</i>
Internal <input checked="" type="checkbox"/>	K. Burgess	<i>KRBurgess</i>	6/21	<input type="checkbox"/>	<input type="checkbox"/>	EPSD	
Internal <input checked="" type="checkbox"/>	D. Emborskiy	<i>D. Emborskiy</i>	6/21	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EPSD	
RAC 06 <input type="checkbox"/>				<input type="checkbox"/>	<input type="checkbox"/>		
Independent <input type="checkbox"/>				<input type="checkbox"/>	<input type="checkbox"/>		
Writer's Guide <input type="checkbox"/>				<input type="checkbox"/>	<input type="checkbox"/>		
Validation <input type="checkbox"/>				<input type="checkbox"/>	<input type="checkbox"/>		

Safety Evaluation/Environmental Review Attached? Yes No

a. SOR Program Final Review and Approval
Approval Disapproval

b. SORC/PORC/RI/DH Final Review and Approval

Meeting No. _____

Department Head/Responsible Individual / Date _____

Approval Signature _____

Approval Date _____

SQR Qualified Independent Reviewer / Date _____

Department Head/Responsible Individual _____

6/30/00 6/21/00
Approval Date

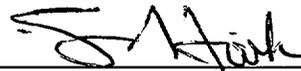
Effective Date: 6/30/00

Decrease In Effectiveness 10CFR50.54(q) Determination

EPDI-03

Rev. 3

Approval:



Manager Emergency Planning Services

Effective Date:

6/30/00

**Level of Use
Information**

Emergency Planning Services Department Instruction
Decrease In Effectiveness 10CFR50.54(q) Determination

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1. PURPOSE

1.1 Objective

This procedure provides instructions for performing an appropriate effectiveness review of proposed changes which may impact the Emergency Preparedness Program.

1.2 Applicability

1.2.1 Changes to the Emergency Plan (E-Plan) require a §50.54(q) evaluation review to determine if those changes decrease the effectiveness of the E-Plan.

1.2.2 Changes to emergency procedures, or modifications to equipment or facilities used to implement the E-Plan or maintain the Emergency Preparedness Program require a §50.54(q) evaluation review to ensure those changes do not directly or indirectly decrease the effectiveness of the E-Plan.

1.2.3 Changes to plant procedures or other non-emergency preparedness documents require a §50.54(q) evaluation review if the change to the subject matter impacts the Emergency Preparedness Program to ensure those changes do not directly or indirectly decrease the effectiveness of the E-Plan.

1.2.4 Any evaluation that results in a decrease in effectiveness requires NRC approval prior to implementation.

1.3 Supporting Documents

1.3.1 Title 10, Code of Federal Regulations, Section 50, paragraph 47(b).

1.3.2 Title 10, Code of Federal Regulations, Section 50, Appendix E, Section IV.

1.3.3 Title 10, Code of Federal Regulations, Section 50, paragraph 54(q).

1.3.4 NGP 4.04, "Review and Approval of Proposed Changes to Selected License Requirements."

1.4 Discussion

1.4.1 The NRC rule 10 CFR 50.54(q) states that the "...licensee may make changes to these [emergency] plans without Commission approval only if the changes do not decrease the effectiveness of the plans and the plans, as changed, continue to meet the standards of §50.47(b) and the requirements of Appendix E of this part."

1.4.2 Effectiveness evaluations are reviewed and approved by the Emergency Planning Manager. Changes to the E-Plan are brought to SORC for approval per NGP 4.04 and are accompanied by the 10 CFR 50.54(q) review. These measures will help ensure that review decisions are not arbitrary and receive an appropriate level of management attention.

2. INSTRUCTIONS

2.1 Performing Effectiveness Reviews

- 2.1.1 Upon receipt of a procedure or other document for review, a member of the EP Department will evaluate and document the §50.54(q) effectiveness review using Attachment 3 as follows:
- a. Complete Part 1, "Preliminary Screen," to determine if *the change* impacts the items which describe the planning standards of §50.47(b), the requirements of Part 50 Appendix E, or additional emergency planning related commitments.
 - b. Complete Part 2 'Assessment of Impact' to indicate whether *the change* involves an item requiring a detailed review to evaluate the impacts.
 - 1) If all items listed in Part 1, "Preliminary Screen," are checked 'NO', the change does not impact the standards of §50.47(b), the requirements of Part 50 Appendix E, or additional Emergency Planning related commitments. No further review and evaluation is required.
 - 2) If any item listed in Part 1, "Preliminary Screen," is checked 'YES', an evaluation of the change against the specific elements of §50.47(b), 10 CFR 50 Appendix E and other applicable regulations, requirements, and commitments is required.
 - c. Complete Part 3, "Effectiveness Review," to document the affect *the change* has on each of the impacted items.
 - 1) Review each change which impacts a listed item.
 - 2) Document the review in the outline format below:
 - Background and Scope: A description of the reason for and scope of the change.

NOTE

For changes that are large in scope in which a one-to-one comparison is not practical, a detailed discussion of the change which compares the current content with the proposed content may be developed.

- Change Comparison: A comparison showing both old and new wording, including step or section number references as applicable. Changes which incorporate new information are marked as "Added to Document." Changes which involve the deletion of information are marked as "Removed from Document."

- Program Requirements: A description of the regulation, commitment or planning criteria for which the Emergency Preparedness Program must demonstrate compliance.
- Change Assessment: A discussion of how the change degrades, does not affect, or enhances the effectiveness and abilities of the Emergency Preparedness Program as it relates to the program requirements.
- Justification: A formal justification which describes the basis and reason the change is appropriate and necessary for any degradation (otherwise, not required).
- References: A list of references such as regulations, licensing commitments, guidance documents, information notices, inspection reports or other sources which contain criteria incorporated by the Emergency Plan related to the change.

- 3) Attach the review to the §50.54(q) evaluation package and record the number of additional pages in the space provided.
- 4) Document whether areas impacted by the proposed changes (which impact the planning standards, requirements of Appendix E, or regulatory commitments) affect the content of the Emergency Plan.
- 5) Document whether the change maintains an equivalent capability or establishes an improved capability of the effectiveness of the Emergency Preparedness Program by checking appropriate assessment of effectiveness boxes. If the change was evaluated to have no affect, check 'N/A'.
- 6) Document whether the proposed change decreases the effectiveness of the Emergency Plan by checking the appropriate statement.
- 7) Document whether the E-Plan continues to meet the standards of 10 CFR 50.47(b), the requirements 10 CFR 50 Appendix E, and all other applicable regulations, requirements, and commitments by checking the appropriate statement.

d. Attach the review documentation to the completed forms, if applicable, and forward the evaluation package to the Emergency Planning Manager for approval.

2.1.2 If the proposed change does not affect the Emergency Plan, the document may be revised, approved and implemented.

2.1.3 If the proposed change does affect the Emergency Plan, the revised Emergency Plan and the document imposing the change must be approved through SORC.

- 2.1.4 For revisions to the Emergency Plan that do decrease the effectiveness of the program:
- a. Apply to the NRC for change approval prior to implementation of the proposed changes.
 - b. Retain a record of each change to the Emergency Plan that decreases the effectiveness until the NRC terminates the license for the reactor.
- 2.1.5 For revisions to the Emergency Plan that do not decrease the effectiveness of the program, and for revisions to the implementing procedures (EPIPs/EPIs):
- a. Submit a report, as specified in §50.4, to the NRC within 30 days after the change is made effective.
 - b. Retain a record of each change to the Emergency Plan made without prior NRC approval for a period of 3 years from the date of change.
- 2.1.6 If the change affects any SERO training program documents, send a copy of the review to the Manager of General Nuclear Training.

2.2 Tracking and Filing

- 2.2.1 Assign a sequential identification number to each approved review package by number and year (e.g., 01-00, 02-00, etc.).
- 2.2.2 Maintain the completed reviews in the Emergency Planning office. (A three-ring binder is available for the current year).

3. SUMMARY OF CHANGES

This procedure has been completely revised.

- 3.1 Incorporated guidance contained in NRC EPPOS #4, "Emergency Preparedness Position (EPPOS) on Emergency Plan and Implementing Procedure Changes."
- 3.2 Incorporated a screening tool to assist reviewers in the determination of whether a proposed change impacts the emergency preparedness program.
- 3.3 Incorporated specific guidance on the outline format for evaluations determined to impact the Emergency Preparedness Program.
- 3.4 Changed approval authority for evaluations from the CRC Chair to the Emergency Planning Manager. Only completed and approved evaluations are taken to the CRC.
- 3.5 Eliminated the requirement for SORC to approve changes to procedures which do not involve changes to the Emergency Plan.
- 3.6 Incorporated detailed guidance in the disposition of changes.

Attachment 1
Definitions and Abbreviations

(Sheet 1 of 1)

Definitions

None

Abbreviations

None

Attachment 2 Responsibilities

(Sheet 1 of 1)

1. The originator of a proposed change must submit the revision (e.g., revised text, figures, etc.) to a qualified reviewer.
2. Emergency Planning Department exempt personnel (emergency preparedness coordinators, engineers, and scientists) are considered qualified to perform an effectiveness evaluation and are responsible for documenting the evaluations in accordance with this procedure.

Attachment 3
§50.54(q) Program Evaluation and Effectiveness Review

(Sheet 1 of 3)

Review No.: _____

Document Title: _____ No.: _____ Revision: _____

PART 1 PRELIMINARY SCREEN

Does the proposed change impact:

YES NO ITEM

- The assignment of responsibilities related to the either principal or supporting organizations, or the ability to respond initially or on a continuous basis.
- The staffing and/or responsibilities of on-shift personnel, or initial activation and long term staffing of emergency response facilities.
- The interface between onsite and offsite support response activities.
- Arrangements for requesting and effectively using assistance or resources from offsite authorities, or the accommodations for federal, state, and/or local staff at the EOF.
- Emergency Action Levels.
- The periodicity of communications and emergency equipment tests.
- Notification procedures to either the SERO, local, state, or federal entities.
- Content of initial and follow-up messages.
- Communications capability among principal response organizations to emergency personnel or the public.
- Dissemination of coordinated information to the general or transient public including periodic information dissemination (brochures).
- Emergency facilities and support equipment, used in emergency response, provisions, or maintenance.
- Methods, systems and/or equipment for the assessment and monitoring of actual or potential offsite radiological consequences.
- Protective Actions developed for either the Plume or Ingestion Exposure Pathways including onsite protective actions.
- Means for controlling emergency worker radiation exposures consistent with the guidelines established by the EPA.
- Arrangements for medical services for contaminated injured individuals.
- Plans for plant reentry and/or recovery organization operations.
- Periodicity of drills and/or exercises as well as deficiency resolution.
- Training requirements for SERO or local site support personnel.
- Responsibilities for Radiological Emergency Response Plan development, maintenance, and review as well as training requirements for personnel maintaining those plans.
- Implementation of federal regulations and requirements or formal commitments related to the Millstone Emergency Preparedness Program.
- The operation, maintenance, or testing requirements of the ERDS.

Complete Part 2.

**Level of Use
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Attachment 3
§50.54(q) Program Evaluation and Effectiveness Review

(Sheet 2 of 3)

Review No.: _____

Document Title: _____ No.: _____ Revision: _____

PART 2: ASSESSMENT OF IMPACT

All items in Part 1 **are not** impacted.

This change **does not** involve the standards of §50.47(b), the requirements of Part 50 Appendix E or additional commitments as described within the Emergency Plan.

No further review and evaluation is required.

Item(s) listed in Part 1 **are** impacted.

An evaluation of the change against the specific elements of §50.47(b), 10 CFR 50 Appendix E and other applicable regulations, requirements, and commitments is required.

Complete Part 3 of this review.

EP Reviewer: _____ Date: _____

EP Manager: _____ Date: _____

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Attachment 3
§50.54(q) Program Evaluation and Effectiveness Review

(Sheet 3 of 3)

Review No.: _____

Document Title: _____ No.: _____ Revision: _____

PART 3 EFFECTIVENESS REVIEW

Documentation of the affect of the proposed changes impacting the Emergency Preparedness Program are attached as pages _____ to this evaluation.

The proposed changes which impact the planning standards, requirements of Appendix E, or regulatory commitments **do** **do not** affect the content of the Emergency Plan.

Does the change maintain the equivalent or establish an improved capability:

YES	NO	N/A	ITEM
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	To respond to an emergency or meet actions or other requirements described in the Emergency Plan.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	In protecting the health and safety of plant personnel and the general public in the event of an emergency.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	In implementation of a federal regulation or requirement or formal commitment.

A decrease in effectiveness in the Emergency Plan is determined to have occurred if there has been a change or reduction in a commitment without a commensurate change or reduction in the bases for that commitment (a commitment is defined as a statement made in the Emergency Plan that affects the capability or resources for responding to an emergency).

NRC approval is required prior to procedure implementation if the proposed change decreases the effectiveness of the Emergency Plan.

Based on this evaluation the proposed change **does** **does not** decrease the effectiveness of the Emergency Plan.

The Emergency Plan **continues** **does not continue** to meet the standards of 10 CFR 50.47(b), the requirements 10 CFR 50 Appendix E, and all other applicable regulations, requirements, and commitments.

EP Reviewer: _____ Date: _____

EP Manager: _____ Date: _____

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