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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 DETERMINATION		004			P	01

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Document Action Request

SPG#

Initiated By: P. Luckey Date: 5/15/01 Department: EPSD Ext.: 2490

Document No.: EPDI 03 Rev. No.: 004 Minor Rev.: 00

Title: Decrease in Effectiveness 10CFR50.54(g) Determination

Reason for Request (attach commitments, CRs, ARs, OEs etc)
Ars 01002579-02 and 00010775-07

Continued

Instructions:

Replace entire document

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 Supersedure

See DC-GDL01 for guidance

TPC OTC Place in VOID

Edit Corr. =>

Plant Mngt Staff Member - Approval

Comments:

KBurgess 5/15/01
RI/DPC Print Name and Date

Continued

Reviews	Print	Sign	Date	SQR Qualified			✓ If Comments
				Yes	No	Dept.	
<input type="checkbox"/>				<input type="checkbox"/>	<input type="checkbox"/>		
<input type="checkbox"/>				<input type="checkbox"/>	<input type="checkbox"/>		
<input type="checkbox"/>				<input type="checkbox"/>	<input type="checkbox"/>		
50.59	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>		
Cross Disc.	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>		
RCD	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>		
Independent	<input checked="" type="checkbox"/>	<u>KBurgess</u>	<u>5/25/01</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>EPSD</u>	

Safety Evaluation Required Yes No

Environmental Review Required Yes No

1. SQR Program Final Review and Approval

Approval Disapproval

KBurgess 5/25/01
SQR Qualified Independent Reviewer / Date
Paul G. Kassio
Department Head/Responsible Individual
5/25/01
Approval Date

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

Department Head/Responsible Individual / Date

Meeting No.: _____

Approval Signature

Approval Date

Effective Date: 5/31/01

Decrease In Effectiveness 10CFR50.54(q) Determination

EPDI-03

Rev. 4

Approval:

Paul A. Blasioli 5/25/01
Process Owner, Emergency Planning
Services Department

Effective Date:

5/31/01

**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 its effectiveness.

1.2.2 Changes to emergency implementing procedures, Emergency Action Level (EAL) Tables, 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 E-Plan's effectiveness.

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 E-Plan's effectiveness.

1.2.4 Any evaluation that results in a decrease in effectiveness requires NRC approval prior to implementing the change.

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).

1.4 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 Services Department (EPSD) Process Owner (PO) or designated Team Lead. Changes to the E-Plan are brought to SORC for approval and are accompanied by the 10 CFR 50.54(q) review. These measures help to 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 an E-Plan change, a procedure change, or other document for review, a member of the EPSD will evaluate the change 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 E-Plan 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 E-Plan related commitments. No further review and evaluation is required. Sign and date.
 - 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. If a detailed evaluation of the change is required, 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," if possible. Changes which involve the deletion of information are marked as "Removed from Document, if possible."

- 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 E-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 E-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 E-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. Sign and date.
- d. If applicable, attach the review documentation to the completed forms and prepare the package for evaluation.
- 1) If the proposed change does not affect the E-Plan, the document may be revised, approved by the PO EPSD, and implemented.
 - 2) If the Emergency Plan is changing, modify the Plan, obtain all necessary reviews, and obtain SORC approval. After SORC approval, the document imposing the change shall be implemented.

- 2.1.2 For revisions to the E-Plan that do decrease the effectiveness of the program:
- a. Apply to the NRC for change approval prior to implementing the proposed changes.
 - b. Retain a record of each change to the E-Plan that decreases the effectiveness until the NRC terminates the license for the reactor.
- 2.1.3 For revisions to the E-Plan that do not decrease the effectiveness of the program, and for revisions to the implementing procedures (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 E-Plan made without prior NRC approval for a period of 3 years from the date of change.
- 2.1.4 If EAL Tables have changed, ensure the EAL templates are modified on the Emergency Notification and Response System (ENRS) Incident Report Form pull-down menu to support the change.
- 2.1.5 If the change affects any SERO training program documents, send a copy of the review to the PO Technical 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., MP-01-01, MP-02-01, etc.).
- 2.2.2 Maintain the completed effectiveness reviews in the EPSD office. (A three-ring binder is available for the current year).

3. SUMMARY OF CHANGES

Revision 3

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.

Revision 4

This procedure has been completely revised.

- 3.7 Added reference to the EAL Tables in step 1.2.2.
- 3.8 Deleted reference to NGP 4.04, "Review and Approval of Proposed Changes to Selected License Requirements."
- 3.9 Upgraded Emergency Planning Manager title in step 1.4.2 to reflect new title, Process Owner.
- 3.10 Added reference to the Emergency Plan in step 2.1.1 as a document which needs a 50.54(q) review for any changes made.
- 3.11 Modified step 2.1.1.d to prepare the documentation review package for evaluation.
- 3.12 Clarified the process for taking Emergency Plan changes to SORC in step 2.1.1.d. SORC approves the changes, and then the associated affected documents shall be implemented. If the Emergency Plan is not changing, the affected documents are implemented after PO, EPDS approval
- 3.13 Added step 2.1.4 to clarify that EAL Tables templates on the Emergency Notification and Response System (ENRS) need to be updated when the EALs are revised.
- 3.14 Updated Manager of General Nuclear Training title in step 2.1.4 to PO Technical Training.
- 3.15 Added abbreviations to Attachment 1, "Definitions and Abbreviations."

Attachment 1

Definitions and Abbreviations

(Sheet 1 of 1)

Definitions

None

Abbreviations

1. EAL - Emergency Action Level
2. E Plan - Emergency Plan
3. EPSD - Emergency Planning Services Department
4. PO - Process Owner

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 Services 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

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

Complete Part 2.

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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: _____

PO EPSP or Designee: _____ 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: _____

PO, EPSD: _____ Date: _____

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