September 28, 2001

Mr. Randall K. Edington
Vice President - Operations
Entergy Operations, Inc.
River Bend Station
P. O. Box 220
St. Francisville, LA 70775

SUBJECT: RIVER BEND STATION - PROPOSED EMERGENCY PLAN CHANGES REGARDING STAFF AUGMENTATION TIMES (TAC NO. MA9566)

Dear Mr. Edington:

In your application dated June 29, 2000, as supplemented by letters dated May 8 and August 23, 2001, and in accordance with 10 CFR 50.54(q), you submitted changes to the River Bend Station Emergency Plan (RBSEP) for Nuclear Regulatory Commission (NRC) review and approval prior to their implementation. The key proposed changes are as follows: (1) delay the augmentation/staffing of the operations support center, the emergency operations facility, and the technical support center; (2) augment five additional Radiation Protection Technicians within 60-90 minutes versus the current 30-minute augmentation time; (3) change the 30-minute augmentation times for other positions noted in RBSEP Table 13.3-7 as 30-minute response to 60-90 minutes; and (4) define deployment times for offsite monitoring teams. Enclosure 1 is the approved RBSEP Table 13.3-17.

To provide additional information needed for NRC staff review of your proposed RBSEP, a meeting was held on May 10, 2001, at NRC headquarters to discuss the RBSEP changes. A meeting summary was issued on June 12, 2001.

Based on the information provided, the NRC staff has concluded that the proposed RBSEP changes are acceptable in that the changes meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E of 10 CFR Part 50. These RBSEP changes shall be implemented within 120 days from the date of receipt of the NRC staff's letter approving the changes.

If you have any questions concerning this letter or the attached Safety Evaluation, please contact me at 301-415-1737.

Sincerely,

/RA by R. Gramm for/

Robert E. Moody, Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-458

Enclosures: Table 13.3-17
Safety Evaluation

cc: See next page

If you have any questions concerning this letter or the attached Safety Evaluation, please contact me at 301-415-1737.

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cc: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO EMERGENCY PREPAREDNESS PLAN CHANGES

ENTERGY OPERATIONS, INC., ET AL.

RIVER BEND STATION

DOCKET NO. 50-458

1.0 INTRODUCTION

In the application dated June 29, 2000, as supplemented by the letters dated May 8 and August 23, 2001, and in accordance with 10 CFR 50.54(q), Entergy Operations, Inc. (the licensee) submitted changes to the River Bend Station (RBS) Emergency Plan (RBSEP) for Nuclear Regulatory Commission (NRC) review and approval prior to their implementation. The key proposed changes are as follows: (1) delay the augmentation/staffing of the operations support center (OSC), the emergency operations facility (EOF), and the technical support center (TSC); (2) augment five additional Radiation Protection Technicians (RPTs) within 60-90 minutes versus the current 30-minute augmentation time; (3) change the 30-minute augmentation times for other positions noted in RBSEP Table 13.3-7 as 30-minute response to 60-90 minutes; and (4) define deployment times for offsite monitoring teams.

The licensee stated the proposed changes had been reviewed considering the requirements of 10 CFR 50.47, 10 CFR Part 50, Appendix E and other applicable NRC guidance. The licensee stated its review determined that the increased augmentation times are a reduction in commitments for the Emergency Preparedness (EP) Program, but will not result in any reduction of the capability of the emergency response organization to respond to an emergency.

To provide additional information needed for NRC staff review of the proposed RBSEP, a meeting was held on May 10, 2001, at NRC headquarters to discuss the RBSEP changes. A meeting summary was issued on June 12, 2001.

Most of the licensee's proposed changes are to RBSEP Table 13.3-17 which provides the licensee's minimum on-shift staffing for emergencies and the licensee's capability for augmentation of the minimum on-shift staffing for emergencies. The table lists positions (i.e., Communicator, Health Physics (HP) Technicians, etc.), the number of personnel to fill those positions on-shift, and the augmentation of the emergency on-shift personnel in 30 and 60 minutes. The tasks the personnel in these positions will perform are contained in Appendix A, "Emergency Organization Job Descriptions," Revision 19, dated December 1998, of the RBSEP.

The licensee's June 29, 2000, application included three attachments. Attachment 1 identified the proposed changes, their justification, and the proposed revisions to the RBSEP to incorporate these changes. Attachment 2 compared the current RBSEP Table 13.3-17 to Table B-1, NUREG-0654. Attachment 3 provided information on Probabilistic Risk Assessment for RBS, a Human Performance Analysis, and Severe Accident Procedures implementation.

2.0 APPLICABLE REGULATIONS AND GUIDANCE

2.1 Regulations

- 10 CFR 50.47(b)(1) states, in part: "...and each principal response organization has staff to respond and to augment its initial response on a continuous basis."

- 10 CFR 50.47(b)(2) states, in part: " ... adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and ..."

- 10 CFR 50.47(b)(8), states: "Adequate emergency facilities and equipment to support the emergency response are provided and maintained."

- 10 CFR 50.47(b)(9), states: "Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use."

2.2 Guidance

- Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 2, states, in part: "The criteria and recommendations contained in Revision 1 of NUREG-0654/FEMA-REP-1 are considered by the NRC staff to be acceptable methods for complying with the standards in 10 CFR 50.47 that must be met in on-site and off-site emergency response plans."

- NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," states in part:

  In Section B. Onsite Emergency Organization, "5. Each licensee shall specify...functional areas of emergency activity.... These assignments shall cover the emergency functions in Table B-1 entitled, "Minimum Staffing Requirements for Nuclear Power Plant Emergencies." The minimum on-shift staffing shall be as indicated in Table B-1. The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency. This capability shall be as indicated in Table B-1...."

  In Section H. Emergency Facilities and Equipment, "1. Each licensee shall establish a Technical Support Center ... in accordance with NUREG-0696, Revision 1" and "2. Each licensee shall establish an Emergency Operations Facility ... in accordance with NUREG-0696, Revision 1."

In Section I. Accident Assessment, “8. Each organization...shall provide methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards.... This shall include activation, notification means, field team composition, transportation, communication, monitoring equipment and estimated deployment times.”

- NUREG-0696, Revision 1, “Functional Criteria for Emergency Response Facilities,” states, in part: in subparagraph 2.3. "Upon activation of the TSC, ... achieve full functional operation within 30 minutes,” and in subparagraph 4.3. "Upon EOF activation,...achieve full functional operation within 1 hour.”

- NUREG-0737, Supplement 1, "Clarification of TMI [Three Mile Island Nuclear Station] Action Plan Requirements", states, in part: in subparagraph 8.2.1.a. "The TSC will perform EOF functions for the Alert Emergency class and for the Site Area Emergency class and General Emergency class until the EOF is functional," in subparagraph 8.2.1.j, "TSC - ... be fully operational within approximately 1 hour after activation,” and in subparagraph 8.4.1.j. "EOF - Staffed using Table 2 (previous guidance approved by the Commission) as a goal. Reasonable exceptions to goals for the number of additional staff personnel and response times for their arrival should be justified and will be considered by NRC staff.”

3.0 EVALUATION

The licensee combined Emergency Response Facility (ERF) staffing changes with changes to the times for the licensee’s capability to augment the on-shift staff for emergencies. The licensee’s capability to augment the on-shift staff for emergencies is required by planning standard 50.47(b)(2) which is not classification dependent. Staffing of ERFs, which is required by planning standard 50.47(b)(8), is classification dependent. Consequently, on-shift staffing for emergencies and capability to augment that staff, as defined in the RBSEP Table 13.3-17, is to be based on the declaration of any emergency and not linked to ERF activation/staffing (operational) time goals.

The NRC staff evaluated the proposed changes in the following order: (1) extend the activation/staffing (operational) time goal of the OSC, the EOF, and the TSC from 60 to 90 minutes; (2) extend the augmentation time for five RPTs from 30 to within 60-90 minutes; (3) extend the 30 minute augmentation time for other positions noted in RBSEP Table 13.3-17 to 60-90 minutes; and (4) define deployment times for offsite monitoring teams.

3.1 Extend the Operational Time Goals for the TSC, OSC, and the EOF from 60 to 90 Minutes

3.1.1 Licensee's Justification

The licensee’s bases for extending the operational time goals for these facilities are: (1) RBS currently staffs all ERFs at an “Alert;” (2) all emergency response organization (ERO) teams are notified and expected to respond at the Alert classification; (3) plant policies, procedures, processes, and training; (4) plant personnel demographics - personnel who staff the ERFs require more time to travel to the site; and (5) RBS population density. RBS maintains multiple ERO teams with one team being on-duty/on-call each week. When an emergency is declared,

ERO members who have pagers are paged and are expected to report to their respective facilities. Personnel who do not carry pagers are called. The proposed 90 minute augmentation time is expected to be the maximum time for personnel to respond to an off-hours notification. The allowance of 90 minutes would not be applied as permission to delay response to an event and that this management expectation is emphasized in training. The first person for a position to arrive at a facility assumes that role whether or not they are the assigned duty team.

3.1.2 NRC Staff Evaluation

3.1.2.1 Activating all ERFs at an "Alert"

Supplement 1 to NUREG-0737 indicates the TSC will be activated at the Alert or higher emergency class and be fully operational within approximately one hour, to allow the control room to focus on mitigating the consequences of the accident, to relieve the control room of managing the accident; and for the Site Area Emergency (SAE) and General Emergency (GE) classes, and to perform EOF functions until the EOF is operational. Consequently, the EOF should be activated at the SAE and GE classes (or earlier) and staffed so as to be functional in approximately one hour.

Current guidance does not address when the OSC is to be activated or an operational time goal. However, in order to relieve the potential for congestion in the control room, the OSC should be activated at the Alert and be operational within 60 minutes, similar to the TSC so as to provide an onsite area separate from the control room where predesignated support personnel can assemble and facilitate performance of support functions and tasks. Activating the TSC (and the OSC) at the Alert is commensurate with current guidance. The licensee indicated that when facility minimum staffing can be accomplished with onsite personnel, it is the goal to become operational within 45 minutes. The licensee provided additional information regarding how the functions of the OSC and TSC would be accomplished if the augmentation times were extended. By increasing the on-shift staffing for emergencies, especially in the functional areas of dose assessment, communications, and maintenance, and by assuring the functional requirements of the facilities, as stated in the RBSEP, are maintained, the licensee has compensated for extending the operational time goals for these facilities. Therefore, this would not be a decrease in effectiveness and is acceptable.

Activating the EOF and having it operational within 90 minutes of an Alert, as opposed to having it operational within 60 minutes of a SAE, would facilitate the early staffing and transfer of certain functions to unburden the control room and the TSC. Consequently, for those accidents which progress from an Unusual Event, a bases for activating/staffing the TSC within 60 minutes has been provided, and activating/staffing it within a goal of 90 minutes following the declaration of an Alert would not be a decrease in the effectiveness of the RBSEP. For those accidents which would immediately be classified as a SAE or GE, delaying the operational time goal for the EOF an additional 30 minutes would have a minimal effect in that (1) additional persons have been added on-shift; (2) the low frequency for SAE and GE classified accidents; and (3) it is the licensee’s goal to have the TSC operational within 45 minutes with onsite personnel and 90 minutes with offsite personnel. Notifying and having all ERO personnel respond at the Alert classification would provide additional bases for extending the EOF activation/staffing (operational) time goal to 90 minutes as discussed above. The NRC

staff has accepted extended times, up to 90 minutes, for the activation/staffing operational goal for EOFs as an alternative method for satisfying planning standard 50.47(b)(8).

3.1.2.2 Plant policies, procedures, processes and training

In the supplemental letter dated August 23, 2001, the licensee indicated that the expectation that ERFs will be staffed as soon as possible without delay is included in all aspects of the ERO training through EP information notices and periodically disseminated through EP newsletters. The licensee also stated that it is RBS's policy for all ERO members, not just the duty team, to respond to an actual emergency. These practices and established policy provide additional bases for extending the current operational time goals for ERFs.

3.1.2.3 Plant personnel demographics

The licensee provided a table which showed the typical response times for the RBS ERO. The table indicated that over 70 percent of the RBS responders can respond in 50 to 65 minutes. The licensee indicated that this percentage was not representative of the persons needed to fill positions necessary for Table 13.3-17 and for ERF operational times. However, the licensee indicated that upon notification of an emergency all responders report to their assigned duty station and when a position is filled, excess personnel are allowed to return home. By extending the augmentation times, the licensee will be able to draw upon a larger pool of personnel for the ERO, which would facilitate having the necessary persons with the appropriate skills respond to the emergency. This would compensate for the extension of times by allowing the licensee the ability to draw upon more available and necessary resources to support the on-shift staff.

3.1.2.4 Population considerations

The licensee indicated in the June 29, 2000, application that the population density in the area around the site had declined from the 1980 to the 1990 census, and that preliminary information from the year 2000 census was not available. However, the local Chamber of Commerce projections show an increase of about 500 to 600 persons by 2004. In the supplemental letter dated August 23, 2001, the licensee indicated the population density within 10 miles of the site as:

From 0 to 2 miles	419
From 2 to 5 miles	2,804
From 5 to 10 miles	17,688
TOTAL	20,911

The licensee demonstrated that the population density within two miles of the plant is small enough so that prompt protective actions could be taken by the appropriate offsite authorities in a timely manner, when informed of plant conditions by the control room staff prior to full augmentation of the on-shift staff and prior to the licensee's ERFs becoming operational.

3.1.3 Summary

The NRC staff finds the alternative times for ERF activation/staffing (operational) time goals acceptable. Currently, the RBSEP indicates that the ERF activation/staffing (operational) time goals are 60 to 75 minutes. Extending the EOF operational time goal to 90 minutes is acceptable provided the RBSEP continues to activate the EOF at the Alert classification. Extending the current OSC and TSC operational time goals to 90 minutes is acceptable due to the compensation provided by adding additional emergency responders on-shift for emergencies to assure that the necessary functions of the ERFs can be performed without degrading the capabilities of the operational on-shift staff to mitigate the consequences of an accident. Therefore, this would not be a decrease in the effectiveness of the RBSEP and the change is acceptable.

3.2 Extend the Augmentation Time for Five Additional RPTs from 30 to Within 60-90 Minutes (Emergency Plan Section 13.3.4.2.2.5)

3.2.1 Licensee's Justification

In the original proposal dated June 29, 2000, the licensee stated that the bases for this proposed change were (1) automated worker access control; (2) Electronic Alarming Dosimeters, Area Radiation Monitors, and self-frisking; (3) RPT coverage when needed; and (4) onsite surveys when needed.

3.2.2 NRC Staff Evaluation

At RBS, the on-shift dose assessment capability is assigned to the Chemistry Technician. The licensee added another dedicated RPT to the on-shift staff for emergencies. Additionally, in the supplemental letter dated August 23, 2001, the licensee stated that Table 13.3-17 is being revised, by adding footnote “j” to reflect two of the eleven RPTs will augment the on-shift staff in 75 minutes, and the remainder would augment in 90 minutes. Therefore, the licensee has provided acceptable compensation in lieu of having 30 minute and 60 minute RPT responders.

3.2.3 Summary

The licensee has provided an acceptable alternative to allow extending the augmentation time for five additional RPTs from 30 to 90 minutes. Extending the augmentation time for the additional RPTs at RBS from 60 to 90 minutes is also acceptable. Therefore, extending these augmentation times from 30 and 60 minutes to within 90 minutes would not be a decrease in the effectiveness of the RBSEP and is acceptable.

3.3 Extend the 30 Minute Augmentation Times for Other Positions in RBSEP Table 13.3-17 From 30 to 90 Minutes (Emergency Plan Sections 13.3.4.2.2.4, 13.3.5.1, and Table 13.3-17).

3.3.1 Licensee's Justification

The licensee identified the positions whose response time would be extended to 90 minutes in Attachment 1 of the application dated June 29, 2000, as Operations, Communicator, Radiation

Protection, and Chemistry Technical Support and Maintenance. The licensee's justification for extending the time for augmentation for each of these positions is as follows:

3.3.1.1 Operations

The licensee stated that operations crews are purposefully overstaffed compared to requirements of NUREG-0654 Table B-1, and that this is a planned staffing decision to ensure personnel are on-shift to facilitate handling postulated emergency events. The licensee indicated that simulator training usually begins with a normal operating condition and escalates to an accident condition that enables the crew to enter the Emergency Implementing Procedures, and that during this time, the operations staff performs the functions they would normally be required to perform in an emergency condition prior to the OSC, TSC, or EOF becoming operational. The conduct of these drills demonstrates the ability to adequately perform such key functional tasks as event classification, offsite dose assessment/calculations, offsite communications/notifications, accident mitigation, core thermal hydraulics, and team prioritization and tracking.

3.3.1.2 Communicator

The licensee stated the initial communicator for any event is a Nuclear Equipment Operator from the on-shift crew, which ensures immediate availability and an individual with a technical background to comprehend/communicate plant equipment and process issues. The individual serves as Emergency Notification System Communicator until the TSC/Control Room Communicator arrives and assumes the responsibility. The licensee indicates improvements were made in the EP program, equipment and readiness which take some of the burden off of the communicator and provide further justification for allowing the response time goal change. Improvements were made in ERO notifications, offsite notifications, and NRC notifications. At least one of the four Nuclear Equipment Operators on shift will be qualified as communicator.

3.3.1.3 Radiation Protection and Chemistry

The licensee indicated that offsite surveys are available when the ERO is fully implemented. Radiological monitoring of the installed instrumentation would be sufficient for the first 60-90 minutes of an accident with on-site, out-of-plant surveys used for verification, as needed. Offsite radiological survey tasks such as soil, water, and vegetation sampling or environmental thermoluminescent dosimeter retrieval can be performed when additional augmentation personnel arrive in 60-90 minutes. These particular samples are not used as input parameters for offsite dose assessment calculations. These types of radiological survey tasks would be considered in the recovery phase following an offsite release of radioactive material and are not needed for the immediate protection of the public health and safety. Chemistry technicians are trained to perform dose assessment and the on-shift chemistry person would report to the main control room to perform dose assessment.

3.3.1.4 Technical Support

The licensee stated that technical support personnel are provided to support supplemental actions need to ensure the plant stays in a stable condition, restore capabilities needed for control of the plant, and assist in planning/preparing necessary corrective maintenance. The licensee states these functions are not needed during the initial stage of an emergency. The

technical support personnel are needed for assessing the extent and impact of damage, practical long-term stabilization options, priority corrective maintenance, and other plant recovery work.

3.3.1.5 Maintenance

The licensee stated that due to the time needed to stabilize the plant and assess the event, the initial phase of an accident scenario is not expected to involve a large need for maintenance personnel. The maintenance staff on-shift will primarily be available to the Operations Shift Superintendent (OSS) to assist in controlling/mitigating the event. Only after the plant is in stable and understood status can attention be refocused to corrective maintenance that may be needed to restore plant conditions. Maintenance personnel can be used as needed by the OSS for decontamination support, observation, or other duties in the initial stages of an event. Until the reactor plant is stabilized and the causal agents are discerned, actual repairs or realignment of plant equipment should not require large-scale maintenance support.

3.3.2 NRC Staff Evaluation

The RBSEP currently provides 30 to 45 and 60 to 75 minutes for the licensee's capability to augment the on-shift staff for emergencies. The NRC staff evaluated the justifications for the HP positions in Section 3.2.2 above, and determined an acceptable basis was provided for these positions to justify extending their time to augment the on-shift emergency staff to 90 minutes. The NRC staff finds that the licensee's actions regarding the emergency on-shift staff would be capable of performing and therefore acceptable. However, these are the actions expected to be performed until the emergency on-shift staff is augmented with additional resources to allow the on-shift staff to focus its attention more on mitigating the accident. Additionally, having the capability to perform offsite dose assessment on-shift is required by Section IV.B of Appendix E to 10 CFR Part 50. The staff has indicated that this task may be performed by on-shift personnel assigned other duties, i.e. the chemistry technician.

The NRC staff has used certain criteria for evaluating a licensee's proposal to extend the times for the capability to augment the minimum emergency on-shift staffing for emergencies. The NRC staff's evaluation of information within the RBSEP and information provided by the licensee concerning some of these criteria is discussed below:

(1) Description of Normal Plant Operating Organization and Staffing for Emergencies

Section 13.3.4.1, RBSEP provides a description of the normal operating organization at RBNS. Although the licensee states that the operations crews for emergencies are purposefully overstaffed compared to NUREG-0654 Table B-1, this table only indicates the minimum staffing requirements for emergencies. The licensee's current staffing exceeds the minimum on-shift staffing for emergencies guidance by having two additional Nuclear Equipment Operators (NEOs), one additional RPT, and two dedicated Electrician/Instrumentation and Control (I&C) Technicians. The normal operating organization and the on-shift staffing for emergencies as shown in revised Table 13.3.17 provides an acceptable alternative to having the corresponding 30 minute responders, and would provide part of the basis to allow extending the remaining 30 and 60 minute responders augmentation times to 90 minutes.

(2) Population Density Considerations

As discussed in Section 3.1.2.4, this consideration supports extending the OSC or TSC operational time goals to 90 minutes. The population density considerations would also provide part of the basis such that the licensee's capability to augment the emergency on-shift staff with responders in 30 and 60 minutes could be extended to 90 minutes.

(3) Increase the ERP Pool

In the application dated June 29, 2000, the licensee provided a table which indicated the extended augmentation time of 75 and 90 minutes was to allow a greater fraction of the RBS staff to be available to participate in the ERO. Allowing the 30 minute responders 90 minutes would expand the pool of resources from which the licensee could draw upon to fill those positions necessary to satisfy the on-shift staffing augmentation capability shown in Table 13.3-17. Therefore, expanding the ERO pool would provide part of the basis for 30 and 60 minute responders to be extended to 90 minutes.

(4) Early Activation of ERFs

The licensee indicated all emergency facilities are activated at the Alert emergency classification. However, as discussed in Section 3.1, the licensee proposes to increase the operational time goal for all emergency facilities to 90 minutes. Current guidance is for the licensee to activate the TSC (and OSC) at the Alert emergency classification. Activating the EOF at the Alert would exceed current guidance that it be activated at the Site Area Emergency classification. The early activation of the OSC, TSC and EOF would provide part of the basis to extend the 30 and 60 minute capability to augment the on-shift staff for emergencies to 90 minutes.

3.3.3 Summary

The licensee's on-shift staffing level exceeds the NUREG-0654 Table B-1 guidance by five positions (two additional NEOs, one additional RPT, and two dedicated Electrician/I&C Technicians). Additionally, nine of the augmenters will augment the on-shift staff in 75 minutes; the remainder would augment in 90 minutes. Acceptable compensation has been provided for extending the current 30 or 60 minute augmentation time for the remaining responders to 75 or 90 minutes as discussed above. Therefore, extending the 30 and 60 minute capability out to 75 or 90 minutes would not be a decrease in the effectiveness of the RBSEP and is acceptable.

3.4 Define Deployment Times for Offsite Monitoring Teams (RBSEP Section13.3.4.2.2.3)

3.4.1 Licensee's Justification

The licensee stated that the offsite radiological monitoring teams are dispatched at a GE or when the Emergency Director (ED) deems it necessary. With offsite teams (Radiation Protection and Chemistry Technicians) reporting at 60-90 minutes, the deployment time is being defined as the time it takes to dispatch the teams upon deciding to deploy them. The RBSEP currently states: "Deployment times for the offsite teams range from 45 minutes to 1 hour and 30 minutes." The licensee proposes to indicate that the time range would begin when it is decided to deploy them.

3.4.2 NRC Staff Evaluation

The licensee stated, in the May 8, 2001, supplemental letter that RBSEP, Section 13.3.4.2.2.3 would be revised to reflect a goal to be ready to deploy offsite monitoring teams as soon as possible but no later than 90 minutes following notification. The licensee indicated that the change to add the words “dispatch the teams upon deciding to deploy them” was not intended as an additional decision for the ED or any other ERO personnel. The offsite teams are sent from the OSC to the EOF at the Alert classification. However, after becoming ready to depart, the licensee has indicated that the Radiological Assessment Coordinator and the Radiation Protection Advisor will brief and deploy the teams based upon several factors, including the status of the emergency and weather conditions.

3.4.3 Summary

This change would not result in a decrease in the effectiveness of the RBSEP and is therefore acceptable to the NRC staff.

4.0 CONCLUSION

The NRC staff concludes that the licensee's proposed RBSEP changes in its application dated June 29, 2000, and as supplemented by letters dated May 8 and August 23, 2001, are acceptable. The NRC staff also concludes that the RBSEP changes meet the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E of 10 CFR Part 50. These RBSEP changes shall be implemented within 120 days from the date of receipt of the NRC staff's letter approving the changes.

Principal Contributor: E. Fox

Date: September 28, 2002