

10 CFR 50 54(q) Draft Guidance
NEI 50.54 (q) Task Force
April 2004

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1. INTRODUCTION:

The purpose of this document is to clearly establish the 10 CFR 50.54(q) review process and provide general guidance for its implementation. This document is meant to be used by the licensee, to determine whether a proposed activity that has an impact on the emergency plan (including the emergency action levels) (1) constitutes a decrease in effectiveness (DIE) of the plan or (2) results in the plan, as changed, no longer meeting either the planning standards of 10 CFR 50.47(b) or the requirements of Appendix E to 10 CFR Part 50. (Note 1)

When the licensee's evaluation under 10 CFR 50.54(q) determines that the proposed activity will not decrease the effectiveness of the plan, and that the plan, as changed, continues to meet the planning standards of 10 CFR 50.47(b) and requirements of Appendix E, prior NRC Nuclear Reactor Regulation (NRR) approval is not required. NRR may subsequently review the revised emergency plan. Licensees may be requested to make available, either through the inspection process or in accordance with 10 CFR 50.4 the supporting documentation and evaluations for plan changes whenever questions arise regarding decrease in effectiveness. This guidance provides a method for documenting evaluations. However, no matter what mechanism is used when a subsequent review takes place, it is ultimately the authority of NRR to determine compliance with regulations. (Note 2)

This process also provides guidance for the review and evaluation of activities that result in emergency plan changes that must be submitted for NRR approval prior to implementation. In accordance with 10 CFR 50.54(q), licensees may make changes, which decrease the effectiveness of the emergency plan but must submit these to NRR for approval prior to implementing the changes. (Note 3)

Note 1 – It is acceptable to relocate emergency plan information to lower tier documents if the evaluation guidance contained in this document is followed.

Note 2 – Nothing contained in this guidance is intended to invalidate prior actions or submittals.

Note 3 – A key point in the discussion of DIE is that "prior commission approval" is meant to be from NRR, and is not be misconstrued by obtaining a "review" from the NRC Regional Headquarters.

2. BACKGROUND

- a) Some interpretation issues and inconsistencies regarding implementation of 10 CFR 50.54(q) by both the licensees and NRC have occurred in the past. Historically, various regulatory and industry documents (e.g., EPPOS 4, proposed rulemakings and responses, draft white paper from 1998) have been prepared in an attempt to clarify the language in 10 CFR 50.54(q) such that licensees "*may make changes to these 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 paragraph 50.47(b) and the requirements of Appendix E to this part.*"
- b) In late 2003, NEI formed a task force to review and evaluate everything done to date regarding 10CFR50.54q issues/challenges. NEI's goal is to formulate guidance for the licensee use. This guidance document also provides guidance to clarify and restore the original intent of the rule in determining the acceptability of changes made pursuant to 10 CFR 50.54 (q). This guidance attempts to clarify and restore the original intent of the rule in determining the acceptability of changes made pursuant to 10 CFR 50.54 (q). While fairly effective at controlling changes, 10 CFR 50.54(q) is often viewed as overly restrictive, somewhat ambiguous, and inconsistently interpreted and applied. In addition, consistent application of the regulation in turn will alleviate potential ambiguities and will reduce unnecessary regulatory burden.

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- c) In July 2003, the NRC published for comment a proposed rule (Emergency Planning and Preparedness for Production and Utilization Facilities (68 Fed. Reg. 43673, July 24, 2003) that would correct prior NRC approval protocol regarding EALs since there is an inconsistency between 10CFR50.54(q) and Appendix E. NRC NRR review and approval of every EAL change prior to implementation is not necessary to provide reasonable assurance that EALs will continue to provide an acceptable level of safety. Requiring prior NRC NRR review and approval in the two situations described in the proposed rule (EAL changes that potentially decrease the effectiveness of the emergency plan and changing from one EAL scheme to another) will ensure adequate regulatory oversight of the licensee's emergency classification system. The NRC will continue to review through the inspection process the licensee's determinations as to which EAL changes represent potential decreases in the effectiveness of the Emergency Plan. These changes will provide a means for licensees to modify their EALs without undo regulatory burden.
- d) While latitude has always existed in that improvements in one area of the plan may offset reductions in another areas, evaluation of the appropriateness of these determinations has been a subject of much discussion and concern. It is the intent of this guidance to reduce or eliminate these inconsistencies and ambiguities. Use of this guidance should allow a licensee to add to, delete from, or modify the current emergency plan, without NRR prior approval provided that the 10CFR50.54(q) evaluation clearly demonstrates that there is no overall reduction in effectiveness of the plan and that the result of the proposed change will provide required protection. This guidance also clarifies the provision to properly evaluate and reduce commitments where a licensee may have exceeded regulatory requirements and where such commitments were not agreed to between the licensee and the regulator to address a site-specific need.
- e) It is expected that licensees will judiciously make determinations regarding 10CFR50.54(q) changes and implement such changes in accordance with regulations. With the use of clarifications provided in this guidance, licensees should methodically implement changes made pursuant to 10 CFR 50.54(q) without prior NRR approval where appropriate while maintaining an acceptable level of safety. Use of this guidance will also provide for fewer unwarranted change requests to be submitted to the regulator for pre-approval resulting in better responsiveness to licensees submitting appropriate changes for review and approval.
- f) Based on the review, performed by the NEI taskforce, the following conclusions were made regarding key issues for implementing procedures and emergency action levels:
- Changes to Procedures Which Implement the Emergency Plan
Licensees may have relocated certain plan information to lower tier documents, such as implementing or administrative procedures, to facilitate more timely and resource efficient updates. The 10 CFR 50.54(q) process refers to changes that may be made to the emergency plan, *not to procedures*, which implement the plan unless information has been relocated to another document. 10 CFR 50.54(q) applies to future proposed changes to these lower tied documents when they include relocated plan information.
 - Clarification of Guidance Regarding Changes to Emergency Action Levels
If a proposed activity results in a change to the EALs, then the licensee under 10 CFR 50.54(q) will determine if there is a decrease in effectiveness of the plan and if it continues to meet the standards in 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50. If the results of the evaluation conclude that there is no DIE and the standards are met, then the licensees may make the changes to EALs without NRR approval.
- g) Guidance on acceptable methods for meeting the requirements of 10 CFR 50.54(q), 10 CFR 50.47(b), and Appendix E is contained in Regulatory Guide 1.101 which references NUREG-0654/FEMA-REP-1, NUMARC/NESP-007, and NEI 99-01. Guidance for implementation is provided in RIS 2003-18. The licensee should review EALs changes with State and local governmental authorities on an annual basis. The licensee shall discuss and obtain agreement on EAL classification scheme changes with State and local governmental authorities prior to implementing the change. NRR approval shall be requested for EAL changes that involve EAL scheme or incorporate a unique methodology, i.e., outside the guidance provided in NURG-0654/FEMA-REP-1, NUMARC/NESP-007, or NEI 99-01.

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3. 10CFR50.54 (q) Requirements

The standards of 10 CFR 50.47(b) and requirements of 10 CFR 50 Appendix E are stated in Attachment 1 to support performing the 10 CFR 50.54(q) evaluation process related to a licensee's emergency plan. Provided below are the requirements of 10 CFR 50.54(q).

- 10 CFR 50.54(q) Requirements

A licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans that meet the standards in 10 CFR 50.47(b) and the requirements in appendix E of this part. The licensee shall retain the emergency plan and each change that decreases the effectiveness of the plan as a record until the Commission terminates the license for the nuclear power reactor. The nuclear power reactor licensee may make changes to these 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 10 CFR 50.47(b) and the requirements of appendix E to this part. This nuclear power reactor licensee shall retain a record of each change to the emergency plan made without prior Commission approval for a period of three years from the date of the change. Proposed changes that decrease the effectiveness of the approved emergency plans may not be implemented without application to and approval by the Commission. The licensee shall submit, as specified in 10 CFR 50.4, a report of each proposed change for approval. If a change is made without approval, the licensee shall submit, as specified in 10 CFR 50.4, a report of each change within 30 days after the change is made.

4. DEFINITIONS AND APPLICABILITY OF TERMS

Implementation of 10 CFR 50.54(q) process is dependent upon the proper use of key terms. The following definitions have been identified as key terms necessary to complete a 10 CFR 50.54(q) evaluation that meets the intent of 10 CFR 50.54(q). These key definitions were put together using guidance associated with the 10 CFR 50.47(b), Appendix E of 10 CFR Part 50, EPPOS #4, proposed Rev 1, and SDP 0609 App B, and NEI 99-04.

- **Activity**: A series of events or actions that may result in a change to the emergency plan.

DISCUSSION:

1. An activity sets in motion the need to determine impact on certain licensing bases documents using regulatory review criteria such as 10 CFR 50.54(q).
2. Activities may range from something as simple as making an editorial change or organization change to complicated facility modifications.
3. For the purposes of 10 CFR 50.54(q) activities, may also originate outside of the owner's responsibility such as road closings or population increases.

- **Approved Emergency Plan**: The latest approved plan is that one reviewed by NRR that received unconditional NRR approval for the issuance or continuance of an operating license.

DISCUSSION:

1. A safety evaluation report or letter from NRC NRR documents approval of the emergency plan.

- **Current Emergency Plan**: The current emergency plan is that plan in use by the licensee that has been evaluated and approved in accordance with 10CFR 50.54(q).

DISCUSSION:

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1. The current plan will include approvals by the NRR as documented in a letter to the licensee, a safety evaluation report, or an inspection report.
 2. The latest approved plan may not necessarily be the current plan in effect. In order to determine DIE, a review of previous NRR correspondence and evaluations is necessary.
 3. The licensees may approve plan changes based on results of the 10 CFR 50.54(q) evaluation without NRC NRR approval.
 4. The current plan includes the current EALs; however, changes to EALs shall be discussed and agreed upon by local and State government authorities prior to implementation.
- **Change:** For the purposes of this document and documents related to or resulting from this document, change is defined as: A result of an activity that, through revision of the emergency plan, adds, modifies or deletes an obligation or commitment that implements the standards of 10 CFR 50.47(b) or requirements of Appendix E and therefore is determined to require evaluation in accordance with 10 CFR 50.54q.

DISCUSSION:

1. A proposed activity that results in a revision to the emergency plan (including EALs) that does not adversely impact the EALs, 10 CFR 50.47(b) planning standards, or App E requirements can be implemented via the screening criteria in Section 5.
 2. A DIE evaluation is required to determine if an activity adversely impacts EALs, 10 CFR 50.47(b) planning standards, or App E requirements and the results of that evaluation determines if NRR approval is needed.
 3. Activities may be identified by the applicability determination process provided by 10 CFR 50.59 (c) 4 or through another process.
- **Emergency Plan Commitment:** Regulatory Commitment means an explicit statement to take a specific action agreed to or volunteered by a licensee that has been submitted in writing on the docket to the NRC (as defined in NEI 99-04, revision 0). Commitments contained in the emergency plan are reviewed and evaluated in accordance with licensee procedures and the NEI guidance. An example of an emergency plan commitment would be a statement made by the licensee in the emergency plan that specifies the licensee's capability or resources (e.g., personnel, equipment) for responding to an emergency.
 - **Effectiveness:** The ability of an emergency plan, as written, to meet the requirements of 10 CFR 50.47(B), Appendix E to 10 CFR Part 50, and thus adequately protect the health and safety of the public.
 - **Decrease in Effectiveness:** A change to the emergency plan, that if implemented, would not meet the requirements of 10 CFR 50.47(B) and Appendix E to 10 CFR Part 50, therefore may reduce the ability to protect the health and safety of the public.
 - **Planning Standard:** Any of the sixteen Emergency Preparedness Planning Standards defined in 10 CFR 50.47(b) and related sections of Appendix E to 10 CFR Part 50.
 - **Risk Significant Planning Standard:** Any of the four Planning Standards defined in 10 CFR 50.47(b): 10 CFR 50.47(b)(4), (5), (9), and (10), including the related sections of Appendix E to 10 CFR Part 50.
 - **NRC Prior Approval:** A change to the emergency plan (including Emergency Action Levels (EAL)) that has been submitted to NRR for approval before the plan or EAL change can be implemented.

5. 10CFR50.54(q) EVALUATION GUIDELINES

The 10CFR50.54(q) evaluation guidelines have been provided and are reflected in Attachment 1. There are six steps defined that outline the process to evaluate proposed activities and the impact on the Emergency Plan. **Attachment 1 is intended to be used to document the review.** Attachment 1 includes a mechanism to document the review of the following:

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- 10 CFR 50.47 (b) [Planning Standards]
- 10 CFR 50 Appendix E Overview
- 10 CFR 50.54 (q)

Step 1: Describe the proposed change(s) to the Emergency Plan

The description should consist of a concise summary of the proposed activity, and a brief statement that explains why the changes are being made. The description should also identify the section(s) of the emergency plan that is (are) being revised as well as any references that are pertinent to the understanding and or acceptability of the screen and or evaluation. For editorial changes it is acceptable to state in this section that the change is editorial in nature and will continue to meet the standards in steps 2 & 3. To determine if the change is editorial in nature use the site-specific guidance specified for a procedure editorial change.

Step 2: Perform a review of the 50.47(b) planning standards

In order to determine if a proposed change has resulted in a reduction in effectiveness it is necessary to review the change and implications of the change against the subject areas defined in 10 CFR 50.47(b) (see Attachment 2 for additional input on each planning standard). Each planning standard should be reviewed and a decision made as to whether it is affected. More detailed documentation of yes answers should be provided. Several of the areas delineated in 10 CFR 50.47(b) have been identified as risk significant planning standards in NRC Inspection Manual MC 0609, Appendix B, "Emergency Preparedness Significance Determination Process."

Step 3: Perform a review of Appendix E

Just as it is necessary to evaluate the proposed change against 10 CFR 50.47(b) to determine if a reduction in effectiveness has occurred, it is also necessary to evaluate the change against the eight criteria in 10 CFR 50 Appendix E. Documentation to support both yes and no answers should be provided. More detailed documentation of yes answers should be supplied in the comments section.

Step 4: Describe the effect of the proposed change(s) on the effectiveness of the emergency plan

Steps 1 through 3 provide the foundation for Step 4. In this section the data documented in steps 2 and 3 are compared against four criteria that will provide reasonable assurance that the effectiveness has or has not been reduced. In addition, changes that affect information in the emergency plan but are not derived from either 10 CFR 50.47(b) or Appendix E are also reviewed for impact.

If the affected section of the plan does not implement a planning standard (refer to Part 3) then determine if the section was added to the plan based on a written commitment to the NRC (use the commitment data base and assistance from plant regulatory departments to determine if there are any commitments).

If the section of the plan does not implement a planning standard or is a commitment to the NRC then state in this section that "*information in the section of the plan was provided as information only and therefore changes to the section do not reduce the effectiveness of the plan*"

If the section of the plan does implement a planning standard, determine if the change decreases the effectiveness of the plan by the following:

- If the change still implements the planning standard utilizing a different method then document the new method and state *why* the change does not decrease the effectiveness of the plan
- If a set point was changed then state *why* the change is a set point change and the change is not a decrease in the effectiveness of the plan
- If an instrument/tool type was substituted and the instrument still performs the same function, then state *why* the instrument/tool still performs the same function the change does not alter the effectiveness of the plan

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The planning standards set baseline minimum levels for planning purposes. In some cases the Emergency Plan exceeds those baseline levels. If the plan exceeds the baseline standard and a reduction is proposed then determine if a commitment was made to the NRC (other than the plan) where the licensee committed to a baseline that was greater than the planning standard. If so, consultation with the plant's regulatory department is required for the change (prior approval of the change may be required – see section 6 of this guidance). If no commitment to the NRC was made state how the section that is changing exceeds the baseline planning standards and make a determination that the information that exceeded the planning standard was provided as "information only" and therefore the change does not decrease the effectiveness of the plan

Step 5

Step 5 provides an opportunity to further establish whether the change continues to meet 10 CFR 50.47(b) and Appendix E through justification of the acceptability of the change (i.e., the how and why). A summary of the review performed to this point is established. Reasonable assurance that documentation providing insight into the bases for the emergency plan are also examined. Affected planning standards should be identified here and annotated if they are risk significant. If, in this step it is determined that the planning standards are not met, the change should either be altered to allow the standards to be met or NRR approval should be sought.

Step 6

The final step is to provide the overall conclusion that the change either does or does not decrease the effectiveness of the plan. In addition, step 6 documents who performed and reviewed the evaluation.

6. NRC PRIOR APPROVAL

The need for NRC NRR prior approval, as defined in Section 4, is delineated in the attached flow chart (Attachment 3) based on the results of Section 5.

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7. REFERENCES

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

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

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

EPPOS 4: "EMERGENCY PREPAREDNESS POSITION (EPPOS¹) ON EMERGENCY PLAN AND IMPLEMENTING PROCEDURE CHANGES," dated November 1998

RIS 2003-18 NRC REGULATORY ISSUE SUMMARY 2003-18 USE OF NEI 99-01, "METHODOLOGY FOR DEVELOPMENT OF EMERGENCY ACTION LEVELS,"

FSAR

NRC Inspection Manual MC 0609, Appendix B, "Emergency Preparedness Significance Determination Process," dated 03/06/03

NRC Letter to licensees on emergency preparedness

NUREG-0694, "TMI-Related Requirements for New Operating Licenses"

NUREG-0737, "Clarification of TMI Action Plan Requirements"

NUREG-0696, "Criteria for Emergency Planning Facilities"

NUREG-0654, Rev. 1 "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants"

EPA 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents"

10 CFR 100, "Reactor Site Criteria"

FEMA REP-10, "Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants"

NEI 99-01, "Methodology for development of Emergency Action Levels"

NEI 99-02, "Regulatory Assessment Performance Indicator Guideline"

NEI 98-03, "Guidelines for Updating Final Safety Analysis Reports"

NEI 99-04, "Guidelines for Managing NRC Commitment Changes"

Proposed Rule, Emergency Planning and Preparedness for Production and Utilization Facilities (68 Fed. Reg. 43673, July 24, 2003) to amend 10 CFR Part 50 Appendix E.IV regarding NRC approval of licensee changes to Emergency Action Levels (EAL) and exercise requirements for co-located licensees

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10 CFR 50.54(q) Evaluation Process

Instructions:

The following is guidance on performing 10CFR50.54(q) evaluations as part of licensees input to plant specific safety evaluation processes. All steps must be completed if a yes answer is documented to any part of Step 2 or 3. If Step 2 and 3 are all no, document and complete Step 5 and 6.

Step 1 – Describe the proposed change to the emergency plan

Step 2 – Perform a review of the 10 CFR 50.47(b) planning standards

Step 3 – Perform a review of Appendix E

Step 4 – Describe the effect of the proposed change(s) on the effectiveness of the emergency plan

Step 5 – Describe if and how the revised emergency plan will continue to meet the standards of 10CFR50.47(b) and the requirements of Appendix E to 10CFR50.

Step 6 - Conclusion and approval

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Step 1 - Describe the proposed change(s) to the Emergency Plan	
Action	Result
Emergency plan section	
Description of change	
For editorial changes it is acceptable to state in this section that the change is editorial in nature and will continue to meet the standards in steps 2 & 3. To determine if the change is editorial in nature use the site specific guidance specified for a procedure editorial change.	
Reference(s) (e.g., plant tracking document)	

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Step 2 - Perform a review of the 50.47(b) planning standards		
Action	Result	
Does this activity affect any of the following subject areas of 10 CFR 50.47(b)? SDP 0609B (*Risk Significant Planning Standard)		
1. Assignment of ERO responsibilities	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2. Assignment of on-shift ERO personnel	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3. Arrangement for utilizing State or local resources and staff	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4. EALs	<input type="checkbox"/> Yes	<input type="checkbox"/> No
5. Notifications to off-site agencies, the ERO or the public	<input type="checkbox"/> Yes	<input type="checkbox"/> No
6. Communications between off-site agencies, the ERO, or the public	<input type="checkbox"/> Yes	<input type="checkbox"/> No
7. Dissemination of public information	<input type="checkbox"/> Yes	<input type="checkbox"/> No
8. Adequacy of emergency facilities and equipment	<input type="checkbox"/> Yes	<input type="checkbox"/> No
9. Methods, systems, and equipment for off-site response to a radiological emergency	<input type="checkbox"/> Yes	<input type="checkbox"/> No
10. Protective Action Recommendations	<input type="checkbox"/> Yes	<input type="checkbox"/> No
11. Emergency Worker radiological control	<input type="checkbox"/> Yes	<input type="checkbox"/> No
12. Medical services for contamination injured personnel	<input type="checkbox"/> Yes	<input type="checkbox"/> No
13. Re-entry / Recovery plans	<input type="checkbox"/> Yes	<input type="checkbox"/> No
14. Drills and exercises	<input type="checkbox"/> Yes	<input type="checkbox"/> No
15. Radiological emergency response training	<input type="checkbox"/> Yes	<input type="checkbox"/> No
16. Plan development, review and distribution	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Comments:		

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Step 3 – Perform a review of Appendix E		
Action	Result	
Does the proposed activity affect any of the following subject areas of 10 CFR 50, Appendix E?		
(i)(ii)(iii) Emergency plans as described in the FSAR	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(iv) A. Organization for coping with radiological emergencies	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(iv) B. Assessment of radiological emergencies	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(iv) C. Classifications, EALs and ERO activation	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(iv) D. Notification of Federal, State and local agencies and the public	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(iv) E. ERFs, equipment, and communications	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(iv) F. Training, drills, and exercises	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(iv) G. Plans and procedures and surveillance of equipment and supplies	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(iv) H. Re-entry and Recovery following an accident	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Comments:		

If all answers to Step 2 and Step 3 are NO, document in Step 5 and 6 and implement change.

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Step 4 - Describe the effect of the proposed change(s) on the effectiveness of the emergency plan	
Action	Results
1. If the affected section of the plan does not implement a planning standard (refer to Attachment 2) then determine if the section was added to the plan based on a written commitment to the NRC (use the commitment data base and assistance from plant regulatory departments to determine if there are any commitments).	
2. If the section of the plan does not implement a planning standard or is a commitment to the NRC then state in this section that <i>"information in the section of the plan was provided as information only and therefore changes to the section do not reduce the effectiveness of the plan"</i>	
3. If the section of the plan does implement a planning standard, determine if the change decreases the effectiveness of the plan by the following:	
o If the change still implements the planning standard utilizing a different method then document the new method and state why the change does not decrease the effectiveness of the plan	
o If a set point was changed then state the change is a set point change and why the change is not a decrease in the effectiveness of the plan	

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Step 4 - Describe the effect of the proposed change(s) on the effectiveness of the emergency plan	
Action	Results
<ul style="list-style-type: none">○ If an instrument/tool type was substituted and the instrument still performs the same function, then state why the instrument/tool still performs the same function the change does not alter the effectiveness of the plan	
<ul style="list-style-type: none">○ The planning standards set baseline minimum levels for planning purposes. In some cases the emergency plan exceeds those baseline levels. If the plan exceeds the baseline standard and a reduction is proposed then determine if a commitment was made to the NRC (other than the plan) where the licensee committed to a baseline that was greater than the planning standard. If so, consultation with the plant's regulatory department is required for the change (prior approval of the change may be required – see section 6 of this guidance). If no commitment to the NRC was made state how the section that is changing exceeds the baseline planning standards and make a determination that the information that exceeded the planning standard was provided as "information only" and therefore the change does not decrease the effectiveness of the plan	

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Step 5 - Describe if and how the revised emergency plan will continue to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR50.

Action	Results
Based on steps 2 and 3, document the results of how the revised emergency plan will continue to meet the standards of 10 CFR 50.47(b) and requirements of Appendix E.	
Determine what planning standards (PS) are affected by the change from the above documents.	List Planning Standards
Is it a risk significant (RS) PS? (4, 5, 9 or 10)	<input type="checkbox"/> Yes <input type="checkbox"/> No

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ATTACHMENT 2

10CFR50.47(b) Planning Standards Overview

10CFR 50.47 (b) (1) responsibilities & staffing

- Primary responsibilities have been assigned for emergency response by
- Nuclear facility licensee
- State and local organizations within the Emergency Planning Zones
- Emergency responsibilities of the various supporting organizations have been specifically established.
- Each principal response organization has staff to respond and to augment its initial response on a continuous basis.

10CFR 50.47 (b) (2) on-shift responsibilities & timely augmentation

- On-shift responsibilities for emergency response are unambiguously defined.
- Adequate staffing to provide initial facility accident response in key functional areas is maintained at all times.
- Timely augmentation of response capabilities is available.
- The interfaces among various onsite response activities and offsite support and response activities are specified.

10CFR 50.47 (b) (3) assistance & augmentation

- Arrangements for requesting and effectively using assistance resources have been made,
- arrangements to accommodate State and local staff at the licensee's near-site Emergency Operations Facility have been made,
- other organizations capable of augmenting the planned response have been identified.

10CFR 50.47 (b) (4) emergency classification and action level scheme

- A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee,
- and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

10CFR 50.47 (b) (5) notification procedures

- Procedures have been established for notification, by the licensee, of
- State and local response organizations
- Emergency personnel by all organizations;
- The content of initial and follow-up messages to response organizations and the public has been established;
- Means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone.

10CFR 50.47 (b) (6) Communications Provisions

- Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

10CFR 50.47 (b) (7) Public Information

- Public education materials provided periodically to the public

10CFR 50.47 (b) (8) emergency facilities and equipment

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ATTACHMENT 2

10CFR50.47(b) Planning Standards Overview

- Procedures
- Procedures and drawings shall be distributed and controlled within the ERFs in accordance with licensee procedures

10CFR 50.47 (b) (9) radiological assessment methods, systems, and equipment

- Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

10CFR 50.47 (b) (10) protective actions

- A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate,
- Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and
- Protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

10CFR 50.47 (b) (11) radiological exposure control & protective action guides.

- Means for controlling radiological exposures, in an emergency, are established for emergency workers.
- The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

10CFR 50.47 (b) (12) medical services

- Arrangements are made for medical services for contaminated injured individuals.

10CFR 50.47 (b) (13) recovery and reentry plans

- General plans for recovery and reentry are developed.

10CFR 50.47 (b) (14) drills & exercises

- Periodic exercises are conducted to evaluate emergency response capabilities,
- Periodic drills are conducted to develop and maintain key skills.
- Deficiencies identified as a result of exercises or drills are corrected.

10CFR 50.47 (b) (15) emergency response training

- Training is provided to those who may be called on to assist in an emergency.

10CFR 50.47 (b) (16) emergency response planner Responsibilities & training

- Responsibilities for plan development, review, and distribution are established.
- Planners are properly trained

ATTACHMENT 3

Decrease In Effectiveness (DIE) Screen and Evaluation

