

September 9, 2004

MEMORANDUM TO: Nader L. Mamish, Director  
Emergency Preparedness Directorate  
Division of Preparedness and Response  
Office of Nuclear Security and Incident Response

FROM: Robert E. Moody, Sr. Emergency Preparedness Specialist/**RA**  
Licensing and Regulatory Improvements Section  
Emergency Preparedness Directorate  
Division of Preparedness and Response  
Office of Nuclear Security and Incident Response

SUBJECT: SUMMARY OF MEETING WITH THE NUCLEAR ENERGY INSTITUTE  
REGARDING THE DEVELOPMENT OF A SMART APPLICATION  
TEMPLATE RELATED TO ON-SHIFT STAFFING LEVELS AND  
AUGMENTATION TIMES CHANGES

On August 20, 2004, the Emergency Preparedness Directorate held a public meeting with the Nuclear Energy Institute and industry personnel to discuss the draft smart application template for use by licensees when proposing changes related to on-shift staffing and augmentation times. The draft template was prepared by the NRC staff in an effort to improve the quality and completeness of licensee applications. The purpose of the meeting was to exchange information in order to improve the draft template. The meeting attendees are listed in Attachment 1.

The NRC meeting announcement and preliminary agenda can be found in ADAMS, Accession number ML042220261.

The meeting focused on three topics:

- The content of the cover letter
- The level of detail in the body of the application
- The attachments

At the conclusion of meeting the next steps to finalize the smart application template were discussed. The attendee consensus was that the NRC staff should incorporate the comments provided during the meeting into the template and attach the revised template to the meeting summary. See attachment 2 for the revised smart application template.

CONTACT: Robert Moody, EPD/DPR/NSIR  
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**ATTENDEES LIST**  
 NRC/NEI MEETING TO DISCUSS THE DRAFT SMART APPLICATION TEMPLATE  
 RELATED TO ON-SHIFT STAFFING LEVELS AND AUGMENTATION TIME CHANGES  
 AUGUST 20, 2004

	<b>NAME</b>	<b>ORGANIZATION</b>	<b>TITLE/POSITION</b>
1.	Robert Moody	NRC	Sr. Emergency Prep. Specialist
2.	Charles Arnone	Exelon	Corporate EP Director
3.	Alan Nelson	NEI	Chief, Emergency Preparedness
4.	Tom Beedle	Duke Energy	Catawba EP Manager
5.	Martin Vonk	Nuclear Management Corp.	Corporate EP Manager
6.	Stacy Rosenberg	NRC	Team Leader, Reg. Improvements
7.	Eric Weiss	NRC	Section Chief
8.	Kevin Williams	NRC	EP Specialist
9.	Lane Hay	Bechtel Licensing	Sr. Licensing Engineer
10.	Brian McBride	Dominion Resources	Manager EP
11.	Cyrus Anderson	Southern Cal. Edison	Mgr., Emergency Preparedness
12.	Don Mothena	Florida Power & Light	Mgr., Emergency Preparedness
13.	Dan Barss	NRC	Team Leader, Sr. EP Specialist
14.	Eric Benner	NRC	Technical Assistant
15.	Deanne Raleigh	Sciencetech	

**Smart Application Template for  
Requesting Emergency Plan Changes Related to  
On-shift Staffing Levels and Augmentation Times**

NOTES: (1) A separate template has been developed for use when requesting changes to Emergency Action Levels. See ADAMS number ML041210096.  
(2) An applicant for an emergency plan change may confer informally with the NRC staff prior to sending the application. This pre-application conference should be initiated through the Office of Nuclear Reactor Regulation Project Manager for the applicant's site.

**I. Three parts of the Application:**

1. Cover letter
2. Body of the application
3. Attachments

A. Content of the cover letter

1. Specify the proposed change(s).
  - a. State the change(s) you want reviewed and approved. Be specific.
  - b. State why the change(s) are needed.
2. Identify which regulation or NRC guidance document under which the application is being submitted.
  - a. The change is a proposal of an alternative method (same capability/different means) under Regulatory Guide 1.101.
  - b. The change is a decrease in effectiveness of the emergency plan. State that the proposed change has been reviewed considering the standards in 10 CFR 50.47 and the requirements of 10 CFR 50 Appendix E.
3. Provide the names of the licensing and technical contacts.
4. Request a date for NRC approval. If the approval date is less than one year, provide a justification. For example:
  - a. changes needed prior to next exercise
  - b. correction of an NRC identified weakness
  - c. scheduling conflicts with an outage
  - d. time needed to get changes approved and conduct training
  - e. some other reason
5. Reference attachments.

B. Body of the application

1. State each proposed change and discuss the justification for the change and any measures that will be implemented.
2. State the new basis for the change and how it is as effective or more effective than the current basis for the change.

- a. The current basis may be in writing (e.g., some NRC approved document) or may not be (e.g., site personnel knowledge).
  - b. The current basis may not be known.
3. Define any terms that are unique to the site, related to new technology, etc.
4. Details related to proposed on-shift staffing level changes:
- a. A table can be used with columns for current staffing levels and proposed levels at the function level, such as Table B-1 in NUREG-0654. For a multi-unit site, show the staffing levels that will be in place for each unit in the event of an emergency.
  - b. Discuss on a position or functional basis the current and proposed staffing levels.
  - c. Discuss the qualification program/process for the individuals performing the functions at the current and proposed staffing levels.
  - d. Discuss how the capability to perform each function still exists, or why the function is no longer needed.
  - e. Discuss the use of any precedents. Since many precedents are site-specific, explain why the precedent is applicable to your site.
  - f. Validate the proposed change against actual experience or performance.  
(Optional)
5. Details related to proposed on-shift staffing augmentation times changes:
- a. Clearly describe your augmentation process as it relates to notification, staffed, activation, activate, operational, fully operational, etc. Explain the basis for any changes in the definitions from those in the current emergency plan.
  - b. Define when the augmentation clock starts.
  - c. Provide a justification for extending the response time for each position/function.  
For example:
    - i. Activation of all emergency response facilities at the Alert
    - ii. Provide a statement (and reference) that management expects emergency response organization (ERO) personnel to respond as soon as they are notified.
  - d. Discuss ERO augmentation performance during actual events, call-out drills, and exercises. (Optional)

### C. Attachments

1. Include copies of applicable current sections of the emergency plan and the proposed revision, or a redline/strikeout version showing the proposed change(s).
2. Include a table that shows the current emergency plan wording, the proposed wording, the old and new bases, and a discussion column is one means to present the desired information.

## II. Specific notes

- A. The more limiting document applies (e.g., Table B-1, or equivalent, and Technical Specifications) when staffing the ERO on a 24/7 basis, especially during outages.
- B. Multi-unit sites may benefit from sharing staff from the other unit(s). Address the "" footnote (staffing the unaffected unit(s)) in Table B-1 of NUREG-0654 when sharing resources.
- C. If applicable, discuss how the change affects, or does not affect, the rest of the ERO on a position or functional basis.
- D. Specifically address the need to perform the on-site/out-of-plant task.
- E. Consider including changes in technology that may reduce workload.
- F. No credit is given for probabilistic risk assessment and severe accident management guide information.