



Nuclear Emergency Plan Submittal

**January 9, 2008** 



## Meeting Purpose

- Discuss NMC's purpose for developing a Common Emergency Plan for Monticello and Prairie Island
- Review with the NRC Staff a general overview of the Common Emergency Plan relative to the current plant-specific Emergency Plans
- Discuss and agree upon the licensing process to be used to gain NRC approval in a timely manner
- Obtain NRC feedback and comments on the format, content, and level of detail needed to obtain NRC approval of the NMC Common Emergency Plan

## Common Emergency Plan Drivers

- Response
  - Changes since NUREG-0654
  - Security-based changes
- Organization
  - Eliminate 30-Minute Responders
  - Changes to on-shift response organization
  - Reorganize Emergency Response Facility staffing
- Standardization
  - Incorporate industry best practices
  - Re-baseline Emergency Plan Licensing Bases
- Commonality
  - Permit leveraging of resources
  - Ensure consistent response to emerging regulatory direction

## Key Changes

- Site-specific Annexes
- Increase on-shift staff to meet time critical emergency response requirements
- Eliminate 30-minute Responders
- Emergency Plan section numbering in accordance with NUREG-0654
- Emergency Plan written to minimize the need for future

changes



### Key Changes

- Better alignment of function to facility
  - Most Engineering activities relocated to TSC/OSC
  - News writer re-assigned to EOF from JIC to enhance access to time-critical information
  - Eliminate duplicated functions
  - Improved overall ERO response
- Standardized dose assessment
- Operations personnel cross-trained to perform certain timecritical radiation protection functions at Prairie Island; under consideration at Monticello
- Security management added to staffing at EOF and TSC

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### **Key Changes Summary**

- Proposed ERO organization modeled after high performing plants
  - Efficiency
  - Effectiveness
  - Functions not duplicated in multiple facilities
- Re-baseline Emergency Plan Licensing Basis
  - Ensure appropriate regulatory approval and basis for Emergency Plan
  - Implement changes associated with NUREG-0654
     Table B-1
- Common Emergency Plan provides an acceptable alternative to each site's current Plan

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## Common Emergency Plan Value-Added

#### A common Nuclear Emergency Plan will

- Support continued performance improvement by the Emergency Response Organization (ERO)
- Better align ERO Emergency Response Facilities staffing
- Standardize Response Capabilities
- Facilitate Fleet activities
- Permit leveraging of resources
- Ensure consistent response to emerging regulatory direction
- Re-baseline each site's Emergency Plan Licensing
   Basis

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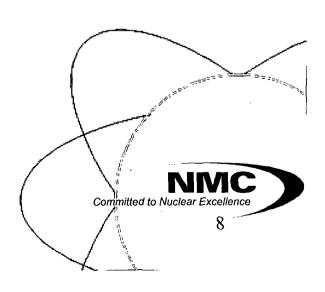
# Licensing Submittal Alternatives

∘ 10 CFR 50.54(q)

• 10 CFR 50.47(b)

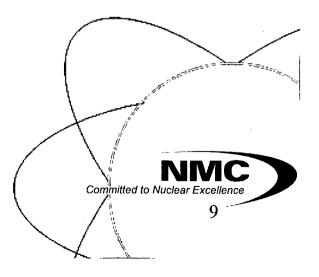
10 CFR Part 50 Appendix E

• 10 CFR 50.90



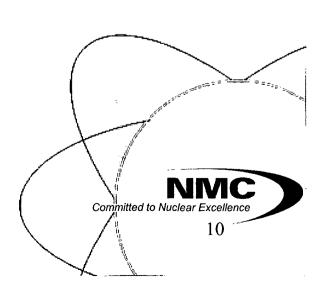
# Licensing Submittal Level of Detail

Discussion on detail of appropriate alternative for submittal



### Implementation Plan

- Emergency Plan Procedures
  - Implementing procedures will be developed to implement Emergency Plan commitments
  - Maintenance procedures will be developed to maintain the emergency response facilities and equipment
  - Administrative procedures will be developed to administer the Emergency Preparedness Program
- Emergency Plan Training
  - Standard Training Modules
  - Standard Training for ERO Positions
  - Proficiency Drills

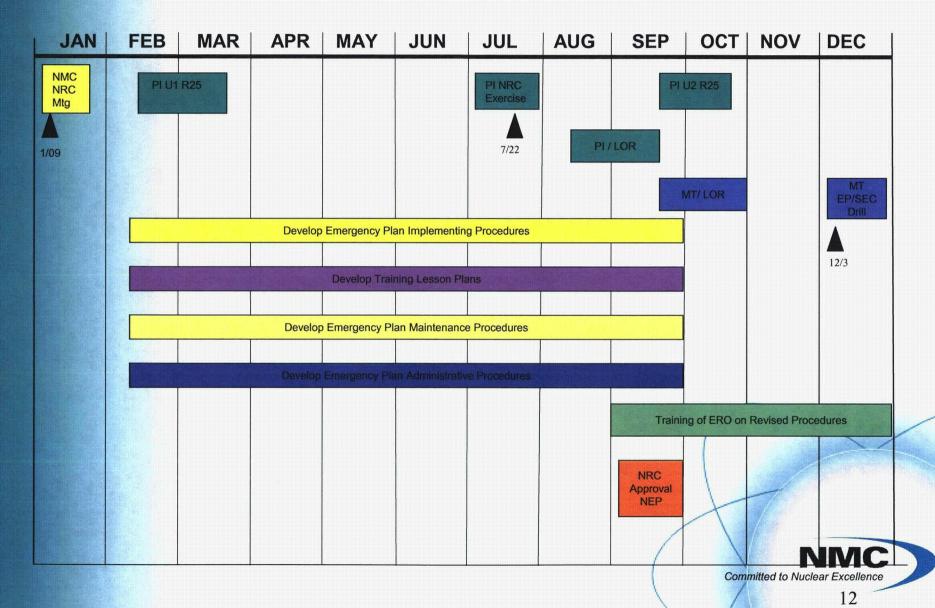


### Implementation Schedule

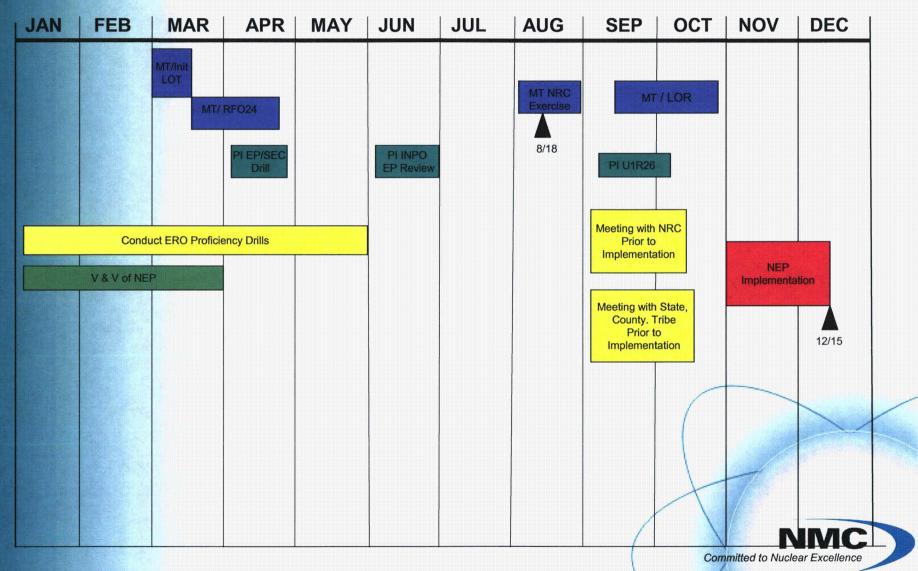
- Site-specific, considering
  - Previously scheduled drills and exercises
  - Procedure development and revisions
  - Training requirements
  - Scheduled site activities
    - Outages
    - INPO Evaluations
    - Drills and exercises
- Immediately effective, with up to two years to implement
  - Current plant-specific plans must remain effective



### Activities Schedule 2008



### Activities Schedule 2009



### Summary

- There is significant value-added to NMC in implementing a Common Emergency Plan for Monticello and Prairie Island
- NMC believes that the Common Emergency Plan will improve Emergency Response at Prairie Island and Monticello
- NMC wants to come to agreement with the NRC staff on the licensing process to be used to gain NRC approval in a timely manner
- NMC wants to clearly understand the format, content, and level of detail needed to obtain NRC approval of the NMC Common Emergency Plan

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