

## APPENDIX B

### Instruction for Completing the Sample Evaluation Form

#### **Developer Instruction**

Each Part, I to VII in this section, provides instructions to the Preparer on how to complete the Evaluation form.

*Note: Developer Instructions are not retained in the station procedure.*

#### **Developer Instruction**

There is no requirement in RG 1.219 for separation of the Screen and Evaluation into two separate forms.

The Developer may elect to combine the Screen and Evaluation into one continuous process.

#### **Evaluation Number:**

#### **Developer Instruction**

Each station may have a different method for numbering evaluation forms. One example is provided below. Replace the below instructions with instructions that describe your station method.

In the space for The Evaluation Number, number the Evaluation using the following format: YearSequentialNumber. Example: The first evaluation performed in 2012 would be numbered 1201.

Provide the number for the Screen that is linked to this Evaluation.

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#### **Part I. Description of Proposed Change**

Identify the proposed change (event or action, or series of actions that may result in a change to the emergency plan or affect the implementation of the emergency plan) being reviewed. Each proposed change should be evaluated separately.

**RG 1.219 Reference:** See section 3.6 for a discussion of what constitutes a change and section 3.5 for a discussion of what constitutes the emergency plan.

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## **Part II. Description and Review of Licensing Basis Affected by the Proposed Change**

Determine if the proposed change affects the licensing basis. The impact of a proposed change cannot be adequately assessed without knowledge of the rationale for the original structure of the affected program element. When making this determination:

- Review the relevant sections of the emergency plan,
- The differences between the current emergency plan and the one with the last NRC approved SER. Also identify the reason for those differences, e.g., need to compensate for preparedness or response constraints or vulnerabilities specific to the facility, emergency planning zone (EPZ), and jurisdiction,
- Relevant license amendments, license conditions, regulatory commitments and correspondence,
- Relevant Commission Orders and related inspection findings,
- Relevant statements of consideration,
- Relevant regulatory generic correspondence, findings, or violations related to similar changes
- Relevant statements in the FEMA ANS Design Report.

**RG 1.219 Reference:** See section 1.6 for additional information on determining if a change affects the licensing basis.

### **Developer Instruction**

Your existing program may include evaluation elements that were incorporated to address site-specific needs, corrective actions or operating experience. Any such elements should be evaluated to determine whether they need to be included in the change evaluation program going forward.

If this is the case, then this example evaluation process will need to be modified to include the former elements.

**Developer Instruction**

Detailed information is provided in section 1.6 in RG 1.219. In this example an outline of the main points of the section are provided.

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**Part III: Describe How the Proposed Change Complies with Relevant Emergency Preparedness Regulation(s) and Previous Commitments Made to the NRC**

Describe how the proposed change complies with relevant emergency preparedness regulation(s) and previous commitments made to the NRC.

If the emergency plan, modified as proposed, no longer complies with planning standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50, the change must be either rejected, modified or processed as an exemption request under 10 CFR 50.12, "Specific Exemptions," rather than under 10 CFR 50.54(q).

**RG 1.219 Reference:** See section 3.4 for a definition of a regulatory requirement.

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**Part IV: Description of Emergency Planning Standards, Functions and Program Elements Affected by the Proposed Change**

Discuss each emergency planning standard, function and program element (or approved alternative to program element) affected by proposed change that was checked as applicable on Screening Form Part V:

- 10CFR50.47(b)(1-16);
- RG-1.219 Sections 4.1-4.16, sub-sections b;
- NUREG-0654/FEMA REP-1 Section II (sub-sections A-P) or approved alternative.

**RG 1.219 Reference:** See section 3.1 for a definition of a planning standard.

**RG 1.219 Reference:** Sections 4.1-4.16 contains the regulatory requirement, emergency planning functions and examples of changes that could, and that would generally not, require prior NRC approval. Do not view the examples of changes as being inclusive or exclusive; instead they should be used to inform decisions involving changes under consideration.

## **Part V: Description of Impact of the Proposed Change on the Effectiveness of the Emergency Plan Functions**

For each affected function, element or commitment being reviewed, describe the impact of the proposed change on effectiveness using the below guidance and the guidance in RG 1.219.

An activity can impact more than one program element or function under different planning standards. Each impacted element and function must be evaluated separately as a reduction in effectiveness. A reduction in effectiveness may occur in one planning standard but not in the other. Unless an activity results in repetitive identical changes or multiple activities result in interdependent changes, the reduction in effectiveness evaluation should be documented separately for each change.

**RG 1.219 Reference:** See section 3.7 for a definition of Reduction in Effectiveness.

A reduction in effectiveness is usually based on the change to a planning standard function. A change to one or more program elements may not always reduce the effectiveness of the associated planning standard function. A reduction in effectiveness will occur if there is a decrease in the capabilities or timeliness for performing or fulfilling a function or commitment without activities to compensate for the reduction.

A comparison of how the affected function, element or commitment is currently fulfilled and how it will be fulfilled as a result of the proposed activity should be documented. Documentation should include a discussion of the capability to meet or perform the function, element, or commitment that exists following the change compared to that which existed prior to the change. Timeliness of the function, element or commitment should also be addressed. Documentation should provide a clear basis for the any differences (e.g., special circumstances that require the difference in order to effectively perform the function or as a matter of convenience or operating philosophy). Documentation should qualify the difference as improving, sustaining or reducing the effectiveness of the planning standard function or commitment.

All conclusions made under 50.54(q) should be supported by defensible rational statements (e.g., “the proposed change does not affect planning standard (b)(5) because...”). Evaluations are to be of a level of rigor and thoroughness consistent with the scope of the proposed changes with particular emphasis placed on the risk-significant planning standards (10 CFR 50.47(b)(4), (5), (9), and (10)).

**RG 1.219 Reference:** See sections 1.1 to 1.4, 1.7, 1.8, 4.0 and 4.1 – 4.16 for additional information to aid in a determination of the impact of the proposed change on the effectiveness of the emergency plan functions.

Check if the proposed change is one for which the NRC encourages exchange information on technical issues prior to finalizing evaluation.

**RG 1.219 Reference:** See section 2 for addition information.

## Part VI. Evaluation Conclusion

Using the information provided in Part II, III, IV and V check the appropriate boxes.

If questions 1 or 2 are answered NO do one of the following:

- Revise the proposed change.
- Reject the proposed change.
- Obtain prior NRC approval of the proposed change under provisions of 10 CFR 50.90.

If questions 1 and 2 are answered YES, and question 3 answered NO, implement applicable change process(es).

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## Part VII. Signatures

Provide the signatures and dates for the:

- Preparer,
- Reviewer,
- Approver.

### **Developer Instruction**

Neither the 50.54(q) regulation nor RG 1.219 requires a signature on an Evaluation.

The signature block is provided as an example only and is not a requirement.

In lieu of multiple signature blocks, the licensee should substitute their station's review and approval process.

### SAMPLE EVALUATION FORM

<b>Evaluation Number:</b>	<b>Screen Number:</b>
<b>Part I. Description of Proposed Change:</b>	
<b>Part II. Description and Review of Licensing Basis Affected by the Proposed Change:</b>	
<b>Part III. Describe How the Proposed Change Complies with Relevant Emergency Preparedness Regulation(s) and Previous Commitment(s) Made to the NRC:</b>	
<b>Part IV. Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change:</b>	
<b>Part V. Description of Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions:</b>	

<b>Part VI. Evaluation Conclusion</b>		
Answer the following questions about the proposed change.		
1. Does the proposed change comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
2. Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
3. Does the proposed change constitute an emergency action level scheme change?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
If questions 1 or 2 are answered NO, or question 3 answered YES, obtain prior NRC approval under provisions of 10 CFR 50.90. If questions 1 and 2 are answered YES, and question 3 answered NO, implement applicable change process(es).		
<b>Part VII. Signatures</b>		
Preparer Name (Print)	Preparer Signature	Date:
Reviewer Name (Print)	Reviewer Signature	Date:
Approver Name (Print)	Approver Signature	Date: