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PNP 2012-055

10 CFR 50.12

June 20, 2012

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

**SUBJECT:** Request for Exemption from Emergency Planning and Preparedness Requirements

Big Rock Point  
Docket 50-155 and 72-043  
License No. DPR-6

Dear Sir or Madam:

Pursuant to 10 CFR 50.12, *Specific Exemptions*, Entergy Nuclear Operations, Inc. (ENO) requests Nuclear Regulatory Commission approval of exemption from the specific requirements of 10 CFR 50, Appendix E, *Emergency Planning and Preparedness for Production and Utilization Facilities*, for the Big Rock Point Independent Spent Fuel Storage Installation. The specific requested exemption and basis is discussed in Attachment 1.

ENO has concluded that, within the provisions of 10 CFR 50.12, an approved exemption would not present an undue risk to the public and that special circumstances are present such that the underlying purpose of the rule has been met.

Attachment 2 provides an Environmental Assessment for the exemptions requested, as required by 10 CFR 51.

This letter identifies no new commitments and no revisions to existing commitments.

Sincerely,

A handwritten signature in black ink, appearing to read "O W Gustafson", written over a light blue horizontal line.

owg/jlk

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Attachment: 1. Request for Exemption from Emergency Planning and Preparedness Requirements  
2. Environmental Assessment

cc: Administrator, Region III, USNRC  
Project Manager, Big Rock Point, USNRC

**ATTACHMENT 1**  
**REQUEST FOR EXEMPTION FROM EMERGENCY PLANNING AND**  
**PREPAREDNESS REQUIREMENTS**

**Introduction**

On November 23, 2011, the NRC issued a final rule amending certain emergency preparedness requirements in the regulations that govern domestic licensing of production and utilization facilities. The final rule was effective on December 23, 2011, with licensees permitted to defer implementation of the final rule until June 20, 2012, with certain exceptions.

Entergy Nuclear Palisades, LLC, (ENP) and Entergy Nuclear Operations, Inc. (ENO) are the holders of Facility Operating License DPR-6 for Big Rock Point (BRP) plant. The license, pursuant to the Atomic Energy Act of 1954 and 10 CFR Part 50, *Domestic Licensing of Production and Utilization Facilities*, allows ENP/ENO to possess the BRP facility. The facility is not licensed for power operation. BRP nuclear power plant has been permanently defueled and dismantled. The BRP facility exists only as an Independent Spent Fuel Storage Installation (ISFSI)

ENP/ENO requests exemption from the implementation of the regulations listed below. The current BRP ISFSI Emergency Plan (EP) continues to meet the non-exempted emergency planning requirements contained in 10 CFR 50 that are applicable to the permanently shutdown and defueled condition of the plant. ENP/ENO concludes that the requested exemption per 10 CFR 50.12, *Specific exemptions*, is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security. The granting of the proposed exemption is within the special circumstances, of 10 CFR 50.12(a)(2)(ii), in that, application of the regulation, in the circumstances described below, is not necessary to achieve the underlying purpose of the rule.

**Previous Exemption**

On September 30, 1998, the NRC issued BRP an exemption, *Exemption from Certain Requirements of 10 CFR 50.54(q) Regarding Offsite Emergency Planning Activities at Big Rock Point Nuclear Plant and Approval of Defueled Emergency Plan (TAC Nos. M99688 and M99689)*. The approved exemption was to certain portions of 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50 to allow BRP to discontinue offsite emergency planning activities and reduce the scope of onsite emergency planning as a result of its permanently shutdown and defueled status. Subsequent to the issuance of the approved exemption, in 2003, all of the spent fuel in the BRP spent fuel pool was transferred to dry cask storage containers for storage at the BRP ISFSI. The bases for the previously approved exemption have not changed. Therefore, ENP/ENO requests the

previously approved exemption be transferred to the new rule and compliance basis to the new rule or grant a new exemption as appropriate.

## Proposed Exemption

ENP/ENO staff have reviewed relevant sections of 10 CFR 50.47(b), 10 CFR 50.54(q), and 10 CFR Part 50, Appendix E, and determined that exemption from certain requirements is required for those requirements that are not applicable to BRP. The identified regulations, with the exception of those for which the September 30, 1998, NRC approved exemption applies, and basis for exemption are listed below.

### 1. 10 CFR 50, Appendix E, Section IV.4., 5., 6., & 7.:

*4. Within 365 days of the later of the date of the availability of the most recent decennial census data from the U.S. Census Bureau or December 23, 2011, nuclear power reactor licensees shall develop an ETE analysis using this decennial data and submit it under § 50.4 to the NRC. These licensees shall submit this ETE analysis to the NRC at least 180 days before using it to form protective action recommendations and providing it to State and local governmental authorities for use in developing offsite protective action strategies*

*5. During the years between decennial censuses, nuclear power reactor licensees shall estimate EPZ permanent resident population changes once a year, but no later than 365 days from the date of the previous estimate, using the most recent U.S. Census Bureau annual resident population estimate and State/local government population data, if available. These licensees shall maintain these estimates so that they are available for NRC inspection during the period between decennial censuses and shall submit these estimates to the NRC with any updated ETE analysis.*

*6. If at any time during the decennial period, the EPZ permanent resident population increases such that it causes the longest ETE value for the 2-mile zone or 5-mile zone, including all affected Emergency Response Planning Areas, or for the entire 10-mile EPZ to increase by 25 percent or 30 minutes, whichever is less, from the nuclear power reactor licensee's currently NRC approved or updated ETE, the licensee shall update the ETE analysis to reflect the impact of that population increase. The licensee shall submit the updated ETE analysis to the NRC under § 50.4 no later than 365 days after the licensee's determination that the criteria for updating the ETE have been met and at least 180 days before using it to form protective action recommendations and providing it to State and local governmental authorities for use in developing offsite protective action strategies.*

*7. After an applicant for a combined license under part 52 of this chapter receives its license, the licensee shall conduct at least one review of any changes in the population of its EPZ at least 365 days prior to its scheduled fuel load. The licensee shall estimate EPZ permanent resident population changes using the most recent U.S. Census bureau annual resident population estimate and State/local government population data, if available. If the EPZ permanent resident population increases such that it causes the longest ETE value for the 2-mile zone or 5-mile zone, including all affected Emergency Response Planning Areas, or for the entire 10-mile EPZ, to increase by 25 percent or 30 minutes, whichever is less, from the licensee's currently approved ETE, the licensee shall update the ETE analysis to reflect the impact of that population increase. The licensee shall submit the updated ETE analysis to the NRC for review under § 50.4 of this chapter no later than 365 days before the licensee's scheduled fuel load.*

**Basis for Exemption:**

On September 30, 1998, as described above, the NRC issued an exemption from certain requirements regarding emergency planning at BRP. One requirement exempted in total was 10 CFR 50, Appendix E, Section IV. New subsections to Section IV include 4, 5, 6 and 7 (above). Section IV.7. is not applicable to BRP as it is for a combined license. The previous exemption was based on there being no other credible events that would result in doses beyond the site area boundary that would exceed the EPA PAGs following 68 days post shutdown (November 5, 1997). The EPZs and the associated protective actions are no longer required. The exemption basis continues to apply. Furthermore, BRP nuclear plant was shutdown almost 15 years ago, and the plant was dismantled. The BRP facility only exists as an ISFSI.

Therefore, ENP/ENO requests the previous exemption that applied to 10 CFR 50, Appendix E, Section IV in total, be extended to new Sections IV.4., 5., 6., and 7. for BRP.

**2. 10 CFR 50, Appendix E, Section IV.A.9**

*9. By December 24, 2012, for nuclear power reactor licensees, a detailed analysis demonstrating that on-shift personnel assigned emergency plan implementation functions are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the emergency plan.*

**Basis for Exemption:**

There are no credible events that would result in doses beyond the site area boundary that would exceed the EPA Protective Action Guides at BRP. The two Emergency Action Levels at BRP are either an Unusual Event or an Alert. As a result the Emergency Planning Zones and associated protective actions are no longer required. BRP is an ISFSI facility. The EP for the BRP ISFSI was revised and approved by the NRC in a letter dated May 18, 2005. The EP accounts for the small BRP staff and minimum backshift coverage. BRP personnel are required to be trained in EP. Based on the above, a detailed analysis to demonstrate that on-shift personnel assigned emergency plan implementation functions are not assigned responsibilities that would prevent timely performance of their assigned functions as specified in the EP, is not necessary for BRP.

Therefore, ENP/ENO requests an exemption to 10 CFR 50, Appendix E, Section IV.A.9.

### 3. 10 CFR 50, Appendix E, Section IV.C.2.:

*2. By June 20, 2012, nuclear power reactor licensees shall establish and maintain the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an emergency action level has been exceeded and shall promptly declare the emergency condition as soon as possible following identification of the appropriate emergency classification level. Licensees shall not construe these criteria as a grace period to attempt to restore plant conditions to avoid declaring an emergency action due to an emergency action level that has been exceeded. Licensees shall not construe these criteria as preventing implementation of response actions deemed by the licensee to be necessary to protect public health and safety provided that any delay in declaration does not deny the State and local authorities the opportunity to implement measures necessary to protect the public health and safety.*

#### Basis for Exemption:

There are no credible events that would result in doses beyond the site area boundary that would exceed the Environmental Protection Agency (EPA) Protective Action Guides (PAG) at BRP. The two Emergency Action Levels at BRP are either an Unusual Event or an Alert. As a result the Emergency Planning Zones and associated protective actions are no longer required. BRP is an ISFSI facility. BRP, unlike nuclear power reactor plants, has no plant instrumentation and no plant operators monitoring indications. On September 30, 1998, as described above, the NRC issued an exemption from certain requirements regarding emergency planning at BRP. One requirement exempted was 10 CFR 50, Appendix E, Section IV.D.3. The exemption approved a change of the 15 minute requirement to notify off-site officials to 30 minutes. Subsequently, on October 13, 2005, the NRC issued an approval letter for revision to the BRP EP. That EP revision allowed notification of the State to be within one hour after classifying the event. The previous approvals recognized that assessing, classifying, and declaring an event and notifying off-site officials within a short timeframe of 15 minutes is not necessary at BRP.

Therefore, because there are no credible events that would result in dose to the public that would exceed EPA PAG at BRP, ENP/ENO requests an exemption from 10 CFR 50, Appendix E, Section IV.C.2. for BRP.

### 4. 10 CFR 50, Appendix E, Section IV.D.3.:

*A licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency. The licensee shall demonstrate that the appropriate governmental authorities have the capability to make a public alerting and notification decision promptly on being informed by the licensee of an emergency condition. Prior to initial operation greater than 5 percent of rated thermal power of the first reactor site, each nuclear power reactor licensee shall demonstrate that administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway EPZ. The design objective of the prompt public alert and notification system shall be to have the capability to essentially complete the initial alerting and initiate notification of the public within the plume exposure pathway EPZ within 15 minutes. The use of this alerting and notification capability will range from immediate alerting and notification of the public (within 15 minutes of the time that State and local officials are notified that a situation exists requiring urgent action) to the more likely events where there is substantial time available for the appropriate governmental authorities to make a judgment whether or not to activate the public alert and notification system.*

*The alerting and notification capability shall additionally include administrative and physical means for a backup method of public alerting and notification capable of being used in the event the primary method of alerting and notification is unavailable during an emergency to alert or notify all or portions of the plume exposure pathway EPZ population. The backup method shall have the capability to alert and notify the public within the plume exposure pathway EPZ, but does not need to meet the 10-minute design objective for the primary prompt public alert and notification system. When there is a decision to activate the alert and notification system, the appropriate governmental authorities will determine whether to activate the entire alert and notification system simultaneously or in a graduated or staged manner. The responsibility for activating such a public alert and notification system shall remain with the appropriate governmental authorities.*

#### **Basis for Exemption:**

On September 30, 1998, as described above, the NRC issued an exemption from certain requirements regarding emergency planning at BRP. One requirement exempted was 10 CFR 50, Appendix E, Section IV.D.3. The 15 minute requirement was changed to 30 minutes. Subsequently, on October 13, 2005, the NRC issued an approval letter for revision to the BRP EP. That revision to the EP allowed notification of the State to be within one hour after classifying the event. Local support if required would be requested via a 911 call. The basis for the approved EP change to a one hour notification is the low risk of radiological risk associated with the dry fuel storage at the BRP ISFSI and the reduced facility staff.

Consistent with the approved EP, ENP/ENO requests an exemption be granted to 10 CFR 50, Appendix E, Section IV.D.3. for BRP to allow notification of responsible State and local governmental agencies within one hour after declaring an emergency.

#### **5. 10 CFR 50, Appendix E, Section IV.E.8.a(ii). through IV.E.8e**

*8.a. (i) A licensee onsite technical support center and an emergency operations facility from which effective direction can be given and effective control can be exercised during an emergency;*  
*(ii) For nuclear power reactor licensees, a licensee onsite operational support center;*  
*b. For a nuclear power reactor licensee's emergency operations facility required by paragraph 8.a of this section, either a facility located between 10 miles and 25 miles of the nuclear power reactor site(s), or a primary facility located less than 10 miles from the nuclear power reactor site(s) and a backup facility located between 10 miles and 25 miles of the nuclear power reactor site(s). An emergency operations facility may serve more than one nuclear power reactor site. A licensee desiring to locate an emergency operations facility more than 25 miles from a nuclear power reactor site shall request prior Commission approval by submitting an application for an amendment to its license. For an emergency operations facility located more than 25 miles from a nuclear power reactor site, provisions must be made for locating NRC and offsite responders closer to the nuclear power reactor site so that NRC and offsite responders can interact face-to-face with emergency response personnel entering and leaving the nuclear power reactor site. Provisions for locating NRC and offsite responders closer to a nuclear power reactor site that is more than 25 miles from the emergency operations facility must include the following:*

- (1) Space for members of an NRC site team and Federal, State, and local responders;*
- (2) Additional space for conducting briefings with emergency response personnel;*
- (3) Communication with other licensee and offsite emergency response facilities;*
- (4) Access to plant data and radiological information; and*

(5) Access to copying equipment and office supplies;

c. By June 20, 2012, for a nuclear power reactor licensee's emergency operations facility required by paragraph 8.a of this section, a facility having the following capabilities:

(1) The capability for obtaining and displaying plant data and radiological information for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves;

(2) The capability to analyze plant technical information and provide technical briefings on event conditions and prognosis to licensee and offsite response organizations for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves; and

(3) The capability to support response to events occurring simultaneously at more than one nuclear power reactor site if the emergency operations facility serves more than one site; and

d. For nuclear power reactor licensees, an alternative facility (or facilities) that would be accessible even if the site is under threat of or experiencing hostile action, to function as a staging area for augmentation of emergency response staff and collectively having the following characteristics: the capability for communication with the emergency operations facility, control room, and plant security; the capability to perform offsite notifications; and the capability for engineering assessment activities, including damage control team planning and preparation, for use when onsite emergency facilities cannot be safely accessed during hostile action. The requirements in this paragraph 8.d must be implemented no later than December 23, 2014, with the exception of the capability for staging emergency response organization personnel at the alternative facility (or facilities) and the capability for communications with the emergency operations facility, control room, and plant security, which must be implemented no later than June 20, 2012.

e. A licensee shall not be subject to the requirements of paragraph 8.b of this section for an existing emergency operations facility approved as of December 23, 2011.

#### Basis for Exemption:

On September 30, 1998, the NRC issued BRP an exemption, *Exemption from Certain Requirements of 10 CFR 50.54(q) Regarding Offsite Emergency Planning Activities at Big Rock Point Nuclear Plant and Approval of Defueled Emergency Plan (TAC Nos. M99688 and M99689)*. The approved exemption was to certain portions of 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50 to allow BRP to discontinue offsite emergency planning activities and reduce the scope of onsite emergency planning as a result of its permanently shutdown and defueled status. The exemption was applied to 10 CFR 50, Appendix E, Section IV.E.8. in its entirety. [9/30/1998 NRC cover letter] The basis for the exemption was that effective direction and control during an emergency emanated from the BRP Emergency Support Center and that BRP EP does not require the use of an Emergency Operations Facility or a Technical Support Center.

Subsequent to the issuance of the approved exemption, in 2003, all of the spent fuel in the BRP spent fuel pool was transferred to dry cask storage containers for storage at the BRP ISFSI. [BRP UFHSR] Although several new requirements have been added to Appendix E, Section IV.E.8. (Section IV.E.8.a.(ii) through Section IV.E.8.e), the basis for the previously approved exemption has not changed and still applies to Section IV.E.8. in its entirety.

Therefore, ENP/ENO requests exemption from 10 CFR 50, Appendix E, Section IV.E., in its entirety.

6. 10 CFR 50, Appendix E, Section IV.F.2.a.

*a. A full participation<sup>4</sup> exercise which tests as much of the licensee, State, and local emergency plans as is reasonably achievable without mandatory public participation shall be conducted for each site at which a power reactor is located. Nuclear power reactor licensees shall submit exercise scenarios under § 50.4 at least 60 days before use in a full participation exercise required by this paragraph 2.a.*

**Basis for Exemption:**

Consumers Energy submittal of supplemental information, on July 30, 1998, amended a previous exemption request. The submittal contained a table of requested exemptions including requests for exemptions to 10 CFR 50, Appendix E, Section IV.F.2.a, and Section IV.F.2.c. The basis for the request were that since there is no design basis or other credible events that would result in doses beyond the site area boundary that would exceed EPA PAG that full participation exercise would no longer be required. In its September 30, 1998, approval of the BRP exemption request that included the Consumers Energy July 30, 1998, supplemental information the NRC stated: "The licensee requested exemption from the complete requirement of 10 CFR 50, Appendix E, IV.F.2.c. to, in part, conduct a biennial exercise with full participation of offsite authorities. The staff found this change acceptable." The lack of inclusion of 10 CFR 50, Appendix E, IV.F.2.a., appears to have been an oversight.

Therefore, ENP/ENO requests exemption from 10 CFR 50, Appendix E, Section IV.F.2.a., in its entirety.

7. 10 CFR 50, Appendix E, Section IV.F.2.b.

*b. Each licensee at each site shall conduct a subsequent exercise of its onsite emergency plan every 2 years. Nuclear power reactor licensees shall submit exercise scenarios under § 50.4 at least 60 days before use in an exercise required by this paragraph 2.b. The exercise may be included in the full participation biennial exercise required by paragraph 2.c. of this section. In addition, the licensee shall take actions necessary to ensure that adequate emergency response capabilities are maintained during the interval between biennial exercises by conducting drills, including at least one drill involving a combination of some of the principal functional areas of the licensee's onsite emergency response capabilities. The principal functional areas of emergency response include activities such as management and coordination of emergency response, accident assessment, event classification, notification of offsite authorities, assessment of the onsite and offsite impact of radiological releases, protective action recommendation development, protective action decision making, plant system repair and mitigative action implementation. During these drills, activation of all the licensee's emergency response facilities (Technical Support Center (TSC), Operations Support Center (OSC), and the Emergency Operations Facility (EOF) would not be necessary, licensees would have the opportunity to consider accident management strategies, supervised instruction would be permitted, operating staff in all participating facilities would have the opportunity to resolve problems (success paths) rather than have controllers intervene, and the drills may focus on the onsite exercise training objectives.*

Basis for Exemption:

On September 30, 1998, the NRC issued BRP an exemption, *Exemption from Certain Requirements of 10 CFR 50.54(q) Regarding Offsite Emergency Planning Activities at Big Rock Point Nuclear Plant and Approval of Defueled Emergency Plan (TAC Nos. M99688 and M99689)*. The approved exemption was to certain portions of 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50, to allow BRP to discontinue offsite emergency planning activities and reduce the scope of onsite emergency planning as a result of its permanently shutdown and defueled status.

Due to the reduced scope of the BRP EP, a partial exemption, to 10 CFR 50, Appendix E, Section IV.F.2.b. is requested from the requirement, to “submit exercise scenarios under 10 CFR 50.4 at least 60 days before use in an exercise required by this paragraph 2.b.”

8. 10 CFR 50, Appendix E, Section IV.F.2.j.

*j. The exercises conducted under paragraph 2 of this section by nuclear power reactor licensees must provide the opportunity for the ERO to demonstrate proficiency in the key skills necessary to implement the principal functional areas of emergency response identified in paragraph 2.b of this section. Each exercise must provide the opportunity for the ERO to demonstrate key skills specific to emergency response duties in the control room, TSC, OSC, EOF, and joint information center. Additionally, in each eight calendar year exercise cycle, nuclear power reactor licensees shall vary the content of scenarios during exercises conducted under paragraph 2 of this section to provide the opportunity for the ERO to demonstrate proficiency in the key skills necessary to respond to the following scenario elements: hostile action directed at the plant site, no radiological release or an unplanned minimal radiological release that does not require public protective actions, an initial classification of or rapid escalation to a Site Area Emergency or General Emergency, implementation of strategies, procedures, and guidance developed under § 50.54(hh)(2), and integration of offsite resources with onsite response. The licensee shall maintain a record of exercises conducted during each eight year exercise cycle that documents the content of scenarios used to comply with the requirements of this paragraph. Each licensee shall conduct a hostile action exercise for each of its sites no later than December 31, 2015. The first eight-year exercise cycle for a site will begin in the calendar year in which the first hostile action exercise is conducted. For a site licensed under part 52, the first eight-year exercise cycle begins in the calendar year of initial exercise required by Section IV.F.2.a.*

Basis for Exemption:

There are no credible events that would result in doses beyond the site area boundary that would exceed the EPA Protective Action Guides at BRP. The two Emergency Action Levels at BRP are either an Unusual Event or an Alert. As a result the Emergency Planning Zones and associated protective actions are no longer required. BRP is an ISFSI facility. The EP for the BRP ISFSI was revised and approved by the NRC in a letter dated May 18, 2005. The EP accounts for the small BRP staff and minimum backshift coverage.

Due to the reduced consequences of an event associated with the BRP ISFSI, an exemption, to 10 CFR 50, Appendix E, Section IV.F.2.j., is requested.

9. 10 CFR 50, Appendix E, Section IV.I.

*I. Onsite Protective Actions During Hostile Action*

By June 20, 2012, for nuclear power reactor licensees, a range of protective actions to protect onsite personnel during hostile action must be developed to ensure the continued ability of the licensee to safely shut down the reactor and perform the functions of the licensee's emergency plan.

**Basis for Exemption:**

There are no credible events that would result in doses beyond the site area boundary that would exceed the EPA Protective Action Guides at BRP. The two Emergency Action Levels at BRP are either an Unusual Event or an Alert. As a result the Emergency Planning Zones and associated protective actions are no longer required. BRP is an ISFSI facility. The EP for the BRP ISFSI was revised and approved by the NRC in a letter dated May 18, 2005. The EP accounts for the small BRP staff and minimum backshift coverage. As an ISFSI facility, a range of protective actions to protect onsite personnel during hostile action to ensure continued ability of the licensee to safely shutdown the reactor is not applicable to BRP.

Therefore, an exemption, to 10 CFR 50, Appendix E, Section IV.I., is requested.

## **ATTACHMENT 2 ENVIRONMENTAL ASSESSMENT**

1. Describe any change to the types, characteristics, or quantities of non-radiological effluents discharged to the environment as a result of the proposed exemption.

There are no expected changes in the types, characteristics, or quantities of non-radiological effluents discharged to the environment associated with the proposed exemption. This application is associated with implementation of emergency planning and preparedness changes. The exemption will not result in changes to the design basis requirements for the structures, systems and components (SSC) at the Big Rock Point (BRP) Independent Spent Fuel Storage Installation (ISFSI), that function to limit the release of non-radiological effluents during and following postulated accidents. The SSC associated with limiting the release of offsite non-radiological effluents will therefore continue to be able to perform their functions, and as a result; there is no significant non-radiological effluent impact. There are no materials or chemicals being introduced that could affect the characteristics or types of non-radiological effluents.

2. Describe any changes to liquid radioactive effluents discharged as a result of the proposed exemption.

There are no liquid radioactive effluents from the BRP ISFSI, and therefore, there are no expected changes to the liquid radioactive effluents discharged as a result of this exemption. The exemption will not result in changes to the design basis requirements for the SSC at the BRP ISFSI.

3. Describe any changes to gaseous radioactive effluents discharged as a result of the proposed exemption.

There are no gaseous radioactive effluents from the BRP ISFSI, and therefore, there are no expected changes to the gaseous radioactive effluents discharged as a result of this exemption. The exemption will not result in changes to the design basis requirements for the SSC at the BRP ISFSI that function to limit the release of gaseous radiological effluents during and following postulated accidents.

4. Describe any change in the type or quantity of solid radioactive waste generated as a result of the proposed exemption.

There are no expected changes in the type or quantity of solid radioactive waste generated as a result of the proposed exemption. The exemption will not result in changes to the design basis requirements for the SSC at the BRP ISFSI that function to limit the release of solid waste during and following postulated accidents.

5. What is the expected change in occupational dose as a result of the proposed exemption under normal and design basis accident conditions?

There would be no expected radiological impact on either the workforce or the public. There are no other expected changes in normal occupational doses.

6. What is the expected change in the public dose as a result of the proposed change under normal and design basis accidents (DBA) conditions?

Dose to the public will not be changed by the proposed exemption.

7. What is the impact to land disturbance for the proposed emergency planning and preparedness exemption?

There is no impact to land disturbance as a result of the proposed emergency planning and preparedness exemption.

#### Conclusion:

There is no significant radiological environmental impact associated with the proposed exemption at the BRP ISFSI. The proposed exemption will not affect any historical sites, nor will they affect non-radiological effluents.