



December 16, 2013  
GDP 13-0020

ATTN: Document Control Desk  
Ms. Catherine Haney  
Director, Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**Paducah Gaseous Diffusion Plant (PGDP)  
Docket No. 70-7001, Certificate No. GDP-1  
Certificate Amendment Request (CAR) –Table 3.2.2-1, Minimum Staffing Requirements**

Dear Ms. Haney:

In accordance with 10 CFR 76.45, the United States Enrichment Corporation (USEC) hereby submits a request for amendment to the Certificate of Compliance for PGDP. This Certificate Amendment Request (CAR) proposes a revision to Table 3.2.2-1, Minimum Staffing Requirements.

Enclosure 1 contains the Oath and Affirmation Statement. Enclosure 2 provides a detailed description and justification for the proposed change. Enclosure 3 is a copy of the revised TSR and Safety Analysis Report (SAR) pages associated with this request. The TSR pages are provided for your review and approval. The single SAR page change has been evaluated in accordance with 10 CFR 76.68. Based on the results of the 10 CFR 76.68 evaluation, the enclosed SAR change does not require prior Nuclear Regulatory Commission (NRC) review and approval and is provided for information only. Enclosure 4 contains the basis for USEC's determination that the proposed changes associated with this CAR are not significant.

The proposed changes will revise the Health Physics (HP) minimum staffing requirements and minimum staffing requirements for C-310. With the enrichment cascade and UF<sub>6</sub> feed, withdrawal, transfer and sampling facilities shutdown, there will be no need for continuous HP presence onsite. The HP position does not perform any safety related activities as credited in the accident analysis or associated TSR required actions. HP coverage will be present when required by plant procedures. The minimum staffing requirements for HP will be revised to not require continuous 24-hour HP coverage. The C-310 minimum staffing mode applicability will be revised to no longer require minimum staffing if the C-310 purge cascade is shut down and UF<sub>6</sub> removed. This is consistent with the existing enrichment cascade facilities minimum staffing requirements. Thus, the proposed changes will not result in any adverse impact on the health, safety or security of workers or the public.

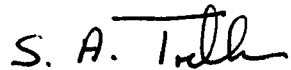
USEC requests NRC review of this CAR as soon as practical. The amendment should become effective 10 days after issuance.

115501

Ms. Catherine Haney  
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Should you have any questions related to this submittal, please contact me at (301) 564-3250. There are no new commitments contained in this submittal.

Sincerely,

A handwritten signature in black ink that reads "S. A. Toelle". The signature is written in a cursive style with a horizontal line above the first name.

Steven A. Toelle  
Director, Regulatory Affairs

Enclosures:

1. Oath and Affirmation
2. Detailed Description and Justification of the Changes
3. Removal/Insertion Instructions
4. Significance Determination

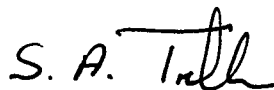
cc: J. Hickey, NRC Region II Office  
O. Siurano-Perez, NRC Project Manager - HQ

**Enclosure 1**  
**GDP 13-0020**

**Oath and Affirmation**

OATH AND AFFIRMATION

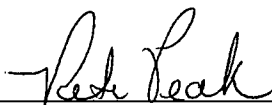
I, Steven A. Toelle, swear and affirm that I am the Director, Regulatory Affairs of the United States Enrichment Corporation (USEC), that I am authorized by USEC to sign and file with the Nuclear Regulatory Commission this Certificate Amendment Request for the Paducah Gaseous Diffusion Plant addressing revisions to the Technical Safety Requirements contained in USEC letter GDP 13-0020, that I am familiar with the contents thereof, and that the statements made and matters set forth therein are true and correct to the best of my knowledge, information, and belief.



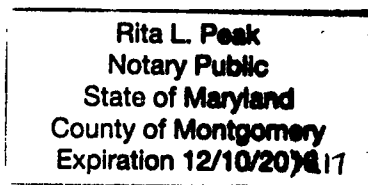
Steven A. Toelle

On this 16<sup>th</sup> day of December 2013, the individual signing above personally appeared before me, is known by me to be the person whose name is subscribed to within the instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof I hereunto set my hand and official seal.



Rita Peak, Notary Public  
State of Maryland, Montgomery County  
My commission expires 12/10/2017



**Enclosure 2**  
**GDP 13-0020**

**USEC-01**  
**Certificate Amendment Request**  
**Revise Table 3.2.2-1, Minimum Staffing Requirements**  
**Detailed Description and Justification of the Changes**

**Enclosure 2  
 GDP 13-0020  
 United States Enrichment Corporation (USEC)  
 Certificate Amendment Request  
 Revise Table 3.2.2-1, Minimum Staffing Requirements  
 Detailed Description and Justification of the Changes**

**1) Description of Change**

TSR Table 3.2.2-1, Minimum Staffing Requirements, currently includes continuous Health Physics (HP) coverage requirements for a minimum of one HP technician to be on plant site at all times. Once all liquid UF<sub>6</sub> operations have been completed in early 2014, the UF<sub>6</sub> feed, withdrawal, transfer and sampling facilities will be shut down. With the enrichment cascade and UF<sub>6</sub> feed, withdrawal, transfer and sampling facilities shutdown, there will be no need for continuous HP presence onsite. HP coverage will be present when required by plant procedures. Therefore, TSR Table 3.2.2-1, Minimum Staffing Requirements, is being revised to remove the requirement for continuous HP coverage under shutdown plant conditions.

Once liquid UF<sub>6</sub> operations are completed and C-310 withdrawal process equipment is shutdown, the C-310 purge cascade will be shut down and UF<sub>6</sub> will be removed and cells placed in the Cascade 3 mode. Cascade 3 mode is currently listed in Table 3.2.2-1, Minimum Staffing Requirements, requiring the C-310 facility to have 2 operators in the facility even if the withdrawal and purge cascade are shutdown. The enrichment cascade facilities (C-331, C-333, C-335 and C-337) do not require minimum staffing when the facility is in the Cascade 3 mode. Therefore, TSR Table 3.2.2-1, Minimum Staffing Requirements, is being revised to remove the Cascade 3 mode from C-310 minimum staffing requirement mode applicability.

The changes shown below are for TSR Table 3.2.2-1, Minimum Staffing Levels. New wording is shown as underlined and deleted wording is shown as a strikeout. The final revised SAR and TSR pages are shown in Enclosure 3. The changes on Enclosure 3 pages are noted with revision bars in the right hand margin.

**Table 3.2.2-1 Minimum Staffing Requirements<sup>a</sup>**

Facility Function	Mode/Operation	Staffing Requirements <sup>h</sup>	Work Area Definition
C-300 <sup>b</sup>	All	2	PSS on the plant site with designee in C-300. Cascade Coordinator on plant site.
C-360 <sup>b</sup>	1b, 3, 4, 5	1	In the facility or immediately surrounding grounds to include the guard station and the local cylinder yard.
	2A, 6	1	In the facility or immediately surrounding grounds to include the guard station and the local cylinder yard.
	7	1	One person in the Laboratory.
	1a	2	In the facility or immediately surrounding grounds to include the guard station and the local cylinder yard.
C-333-A <sup>b</sup>	1, 2, 5, 7	1	One person in the operating facility or immediately surrounding grounds including the local cylinder yard.
C-337-A <sup>b</sup>	3, 4, 8	1	One person in the facility or immediately surrounding grounds including the local cylinder yard.
C-310	Product withdrawal 1, 2, 3, 4 Cascade <del>1, 3</del>	2 <sup>c</sup>	At least one person in the ACR. One person in the facility or immediately surrounding grounds including the local cylinder yard.
C-315	1, 2, 3, 4	2 <sup>c</sup>	Two persons in the facility or immediately surrounding grounds including the local cylinder yard.

C-331 / C-335	Cascade 1, 2	2 <sup>f</sup>	At least one person in the ACR.
	F/S 1, 2, 3, 4, 5 Cascade 1 <sup>e</sup>	1	One person in building
C-333 / C-337	Cascade 1, 2	3 <sup>f</sup>	At least one person in the ACR.
	F/S 1, 2, 3, 4, 5 Cascade 1 <sup>e</sup>	1	One person in building
Health Physics	At all times	1	Onsite <sup>l</sup>
Power Operations <sup>g</sup>	Cascade 1, 2, when stage motors are energized.	1	Onsite.
Fire Services <sup>g</sup>	At all times	4 <sup>d</sup>	Onsite <sup>d</sup> .
Security Services <sup>g</sup>	At all times	4	Onsite.

- a. Staffing may be less than the minimum requirement listed for a period of a time not to exceed four hours in order to accommodate unexpected absence of on-duty shift members provided immediate action is taken to restore the shift manning requirements to within the minimum requirements. The C-331, C-333, C-335, and C-337 ACRs shall be manned when required by operating mode. The ACRs for C-310, C-315, C-333-A, and C-337-A shall be manned when required by operating mode. Manning not required during emergency conditions requiring building/area evacuation.
- b. Manning requirement is zero if, 1) all C-333-A or C-337-A autoclaves are in MODE 6 (Not In Use), or 2) all C-360 autoclaves are in Mode 2B (Out of Service) or MODE 8 (Not In Use) and the Transfer Station is in MODE 8 (Not In Use).
- c. When withdrawal process equipment is brought below atmospheric pressure, or to a UF<sub>6</sub> negative in the NOT IN USE (Mode 4) operating mode then the staffing requirements for the appropriate withdrawal facility do not apply.
- d. In accordance with footnote "a", Fire Services personnel making an unexpected run to deliver an individual to a local hospital are allowed to be offsite and are considered to be on duty and available.
- e. The facility is not enriching UF<sub>6</sub> (no stage/booster motors running) and only operations involved with: 1) maintaining a fluorinating environment or dry gas blanket in accordance with TSR 2.4.4.4 or 2) operating a P&E pump and associated valves, headers, and surge drums.
- f. Staffing requirements is zero for limited operations involving equipment, headers and surge drums containing UF<sub>6</sub> if: 1) UF<sub>6</sub> in piping/equipment is below atmospheric pressure; 2) all cascade enrichment cells including booster stations are in Cascade Mode 3, and 3) P&E pumps are not energized.
- g. USEC may procure personnel to fulfill the minimum staffing requirements for C-300 (PSS, Cascade Coordinator), Fire Services, or Security or HP Services, from DOE as enrichment cascade and support facilities are de-leased and returned to DOE regulatory oversight. Compliance with the governing NRC safety basis documents (SAR, TSRs, Emergency Plan, Fire Protection Program, Security Programs, etc.) will remain the responsibility of USEC and the personnel that meet the TSR minimum staffing requirements. USEC will control and oversee these personnel for the PGDP facilities and operations still operated by USEC under NRC regulatory oversight.
- h. USEC will eventually de-lease and return to DOE all process buildings (except C-360) having minimum staffing requirements. The de-lease may be as individual facilities, groups of facilities, or all at once. When facilities are de-leased and returned to DOE regulatory oversight, USEC will not be required to meet the minimum staffing requirements specified in this table for the de-leased facilities. When the facility has been de-leased and returned to DOE regulatory oversight, the facility minimum staffing requirements and associated note(s) will be lined through but not removed from the table.
- i. HP technician not required to be onsite with the enrichment cascade and UF<sub>6</sub> feed, withdrawal, transfer and sampling facilities shutdown.

## **2) Reason for the Changes**

As discussed above in the description of the change, TSR Table 3.2.2-1, Minimum Staffing Requirements, currently specifies that a single HP technician be present on plant site at all times. With the enrichment cascade and UF<sub>6</sub> feed, withdrawal, transfer and sampling facilities shutdown, HP support on a continuous 24-hour basis will no longer be required. HP support will be available as required by plant procedures. The proposed minimum staffing requirements are consistent with the number of operations staff required to safely operate the facility during normal and upset/accident conditions.

With the completion of the liquid UF<sub>6</sub> operations the C-310 withdrawal process equipment and purge cascade will be shut down as discussed above in the description of the change. TSR Table 3.2.2-1 C-310 minimum staffing requirements note c provides minimum staffing relief if the withdrawal process equipment is shut down and meets specific requirements. Since the C-310 facility has both withdrawal and cascade equipment, Table 3.2.2-1 also lists the cascade modes applicable for minimum staffing. Unlike the enrichment cascade facilities (C-331, C-333, C-335 and C-337), C-310 lists the Cascade 3 mode as a mode requiring minimum staffing. With the C-310 withdrawal process meeting the requirements of note c and the C-310 purge cascade shutdown with UF<sub>6</sub> removed (Cascade 3), continuous staffing of C-310 is no longer required. The proposed

minimum staffing requirements are consistent with the number of operations staff required to safely operate the facility during normal and upset/accident conditions.

These changes will allow staffing flexibility, which will result in more efficient and continued safe operation of the very limited operations after UF<sub>6</sub> repackaging and UF<sub>6</sub> liquid operations is completed.

### **3) Justification of the Changes**

Review of the PGDP TSRs and SAR found that the HP personnel have no immediate actions/requirements specified in the TSR Required Actions, nor is there any credit taken in the PGDP SAR accident analysis for HP actions/requirements to prevent or mitigate any postulated accident scenario.

The Emergency Plan (EP) does not require continuous HP presence on plant site. The EP delineates that the responsibilities of the plant emergency squad includes HP skills (training provided by the HP organization) along with other skills (e.g., firefighting, HAZMAT response, and environmental response). The EP does not require an HP technician be included on the plant emergency squad, but does discuss that HP may provide training, support and equipment for the plant emergency squad. In addition, HP may be requested to provide training and support for off-site agencies (hospitals, emergency management, law enforcement, etc.).

There are no minimum staffing requirements for the enrichment cascade facilities (C-331, C-333, C-335 and C-337) when the equipment is shut down and UF<sub>6</sub> removed (Cascade 3 mode). The C-310 purge cascade and the enrichment cascade equipment share the same SAR accident analysis and TSRs with none specific to just the C-310 purge cascade. The SAR and TSRs do not require any immediate actions/requirements that would require operator actions/requirements or mitigate any postulated accident conditions during the Cascade 3 mode. Deleting the Cascade 3 mode for C-310 minimum staffing requirements will be consistent with the enrichment cascade facilities (C-331, C-333, C-335 and C-337) minimum staffing requirements.

The proposed minimum staffing requirements are consistent with the number of operations staff required to safely operate the facility during normal and upset/accident conditions.



**Enclosure 3**  
**GDP 13-0020**

**USEC-01**  
**Certificate Amendment Request**  
**Revise Table 3.2.2-1, Minimum Staffing Requirements**  
**Removal/Insertion Instructions**

**Certificate Amendment Request  
Paducah Gaseous Diffusion Plant  
Letter GDP 13-0020  
Removal/Insertion Instructions**

**Remove Pages**

**Insert Pages**

**APPLICATION FOR UNITED STATES  
NUCLEAR REGULATORY COMMISSION CERTIFICATION  
VOLUME 2**

**SAR Section 6.5  
6.5-3**

**SAR Section 6.5  
6.5-3**

**APPLICATION FOR UNITED STATES  
NUCLEAR REGULATORY COMMISSION CERTIFICATION  
VOLUME 4**

**TSR Section 3.0  
3.0-4**

**TSR Section 3.0  
3.0-4**

are located in the CCF. The plant power system is monitored and controlled through a communication network with the power suppliers. Typical operational activities that are monitored and controlled from the CCF include determining and establishing optimal plant power level, executing or altering the maintenance work plan if necessary, and maintaining necessary manpower level to support plant operations.

Staffing levels for the shifts are not fixed but are based on the expected or planned activity for the shift period. Staffing levels take into account the routine monitoring of plant equipment including operator rounds, expected operational activity level, facility size, and Technical Safety Requirement (TSR) specified staffing requirements. When special activities are included in the work plans, the staffing will be increased as required to perform the planned activity. The required minimum staffing level for Paducah is approximately 30 as detailed in Section 3 of the TSRs.

Each shift organization is composed of a PSS; a cascade coordinator (CC) who directs overall cascade activities; shift engineer; first-line managers for the cascade buildings, UF<sub>6</sub> handling facilities, security, fire services, maintenance and power operations and utility operations; Security Shift Commander; Fire Services Shift Commander; and operators, instrument mechanics, Security Police officers, and firefighters. Less than this normal shift staffing is permitted for short periods with the concurrence of the PSS to allow for call-ins or other compensatory actions.

The PSS provides a direct chain of command from the Operations Manager, Shift Operations Manager, Plant Manager and General Manager to the shift operating staff and serves as the senior shift manager in directing activities and personnel. The operations line organization is accountable to the PSS for reporting plant status.

The CC provides managerial oversight, operations coordination, and assures adequate staffing for all cascade operations on a 24-hour basis. This person approves, directs, and integrates all significant cascade operational activities under the oversight of the PSS.

The remaining members of the shift organization provide the needed functions for round-the-clock operations. First-line managers provide management for, coordination of, and assurance for proper execution of assigned tasks. The shift engineer provides engineering support for technical issues involving operations. The first-line manager for Security supervises the activities necessary to ensure the protection of plant facilities, government property, and classified information. The first-line manager for fire services supervises shift fire services work activities and responds to plant emergency events.

**SECTION 3.0 ADMINISTRATIVE CONTROLS**

**Table 3.2.2-1 Minimum Staffing Requirements<sup>a</sup>**

Facility Function	Mode/Operation	Staffing Requirements <sup>h</sup>	Work Area Definition
C-300 <sup>b</sup>	All	2	PSS on the plant site with designee in C-300. Cascade Coordinator on plant site.
C-360 <sup>b</sup>	1b, 3, 4, 5	1	In the facility or immediately surrounding grounds to include the guard station and the local cylinder yard.
	2A, 6	1	In the facility or immediately surrounding grounds to include the guard station and the local cylinder yard.
	7	1	One person in the Laboratory.
	1a	2	In the facility or immediately surrounding grounds to include the guard station and the local cylinder yard.
C-333-A <sup>b</sup>	1, 2, 5, 7	1	One person in the operating facility or immediately surrounding grounds including the local cylinder yard.
C-337-A <sup>b</sup>	3, 4, 8	1	One person in the facility or immediately surrounding grounds including the local cylinder yard.
C-310	Product withdrawal 1, 2, 3, 4 Cascade 1	2 <sup>c</sup>	At least one person in the ACR. One person in the facility or immediately surrounding grounds including the local cylinder yard.
C-315	1, 2, 3, 4	2 <sup>c</sup>	Two persons in the facility or immediately surrounding grounds including the local cylinder yard.
C-331 / C-335	Cascade 1, 2 F/S 1, 2, 3, 4, 5	2 <sup>f</sup>	At least one person in the ACR.
	Cascade 1 <sup>e</sup>	1	One person in building
C-333 / C-337	Cascade 1, 2 F/S 1, 2, 3, 4, 5	3 <sup>f</sup>	At least one person in the ACR.
	Cascade 1 <sup>e</sup>	1	One person in building
Health Physics	At all times	1	Onsite <sup>i</sup>
Power Operations <sup>b</sup>	Cascade 1, 2, when stage motors are energized.	1	Onsite.
Fire Services <sup>b</sup>	At all times	4 <sup>d</sup>	Onsite <sup>d</sup> .
Security Services <sup>b</sup>	At all times	4	Onsite.

a. Staffing may be less than the minimum requirement listed for a period of a time not to exceed four hours in order to accommodate unexpected absence of on-duty shift members provided immediate action is taken to restore the shift manning requirements to within the minimum requirements. The C-331, C-333, C-335, and C-337 ACRs shall be manned when required by operating mode. The ACRs for C-310, C-315, C-333-A, and C-337-A shall be manned when required by operating mode. Manning not required during emergency conditions requiring building/area evacuation.

b. Manning requirement is zero if, 1) all C-333-A or C-337-A autoclaves are in MODE 6 (Not In Use), or 2) all C-360 autoclaves are in Mode 2B (Out of Service) or MODE 8 (Not In Use) and the Transfer Station is in MODE 8 (Not in Use).

c. When withdrawal process equipment is brought below atmospheric pressure, or to a UF6 negative in the NOT IN USE (Mode 4) operating mode then the staffing requirements for the appropriate withdrawal facility do not apply.

d. In accordance with footnote "a", Fire Services personnel making an unexpected run to deliver an individual to a local hospital are allowed to be offsite and are considered to be on duty and available.

e. The facility is not enriching UF6 (no stage/booster motors running) and only operations involved with: 1) maintaining a fluorinating environment or dry gas blanket in accordance with TSR 2.4.4.4 or 2) operating a P&E pump and associated valves, headers, and surge drums.

f. Staffing requirements is zero for limited operations involving equipment, headers and surge drums containing UF6 if: 1) UF6 in piping/equipment is below atmospheric pressure; 2) all cascade enrichment cells including booster stations are in Cascade Mode 3, and 3) P&E pumps are not energized.

g. USEC may procure personnel to fulfill the minimum staffing requirements for C-300 (PSS, Cascade Coordinator), Fire Services, Security or HP Services, from DOE as enrichment cascade and support facilities are de-leased and returned to DOE regulatory oversight. Compliance with the governing NRC safety basis documents (SAR, TSRs, Emergency Plan, Fire Protection Program, Security Programs, etc.) will remain the responsibility of USEC and the personnel that meet the TSR minimum staffing requirements. USEC will control and oversee these personnel for the PGDP facilities and operations still operated by USEC under NRC regulatory oversight.

h. USEC will eventually de-lease and return to DOE all process buildings (except C-360) having minimum staffing requirements. The de-lease may be as individual facilities, groups of facilities, or all at once. When facilities are de-leased and returned to DOE regulatory oversight, USEC will not be required to meet the minimum staffing requirements specified in this table for the de-leased facilities. When the facility has been de-leased and returned to DOE regulatory oversight, the facility minimum staffing requirements and associated note(s) will be lined through but not removed from the table.

i. HP technician not required to be onsite when the enrichment cascade and UF6 feed, withdrawal, transfer and sampling facilities are shutdown.

**Enclosure 4  
GDP 13-0020**

**USEC-01  
Certificate Amendment Request  
Revise Table 3.2.2-1, Minimum Staffing Requirements  
Significance Determination**

**Enclosure 4  
GDP 13-0020**

**USEC-01  
United States Enrichment Corporation (USEC)  
Certificate Amendment Request  
Revise Table 3.2.2-1, Minimum Staffing Requirements  
Significance Determination**

**NEED TO UPDATE Significance Determination FOR HP minimum staffing change.**

The United States Enrichment Corporation (USEC) has reviewed the proposed change associated with this certificate amendment request and provides the following Significance Determination for consideration.

1. No Significant Change to Any Conditions to the Certificate of Compliance

None of the Conditions to the Certificate of Compliance specifically address the subject TSR and SAR sections that are being revised. Thus, the proposed change will have no impact on any of the Conditions to the Certificate of Compliance.

2. No Significant Increase in the Probability of Occurrence or Consequences of Previously Evaluated Accidents

No new or changed operations of the system or any of its equipment or components are proposed. Therefore, the proposed changes will not significantly increase the probability of occurrence or the consequences of previously evaluated accidents.

3. No New or Different Type of Accident

The proposed changes to the HP minimum staffing requirements and C-310 minimum staffing do not affect the essential controls or required operator actions for any scenario in the accident analysis. The proposed changes do not create any new failure modes or create initiating events that are different than previously evaluated in the SAR. Thus, the proposed changes will not create a new or different type of accident.

Therefore, the proposed change will not create a new or different type of accident.

4. No Significant Reduction in Margins of Safety

The proposed changes to TSR Table 3.2.2-1, Minimum Staffing Requirements, for HP, as described in Enclosure 2, description of changes, will revise the minimum staffing requirements for continuous HP coverage on plant site. Review of the PGDP TSRs found that the HP personnel currently have no immediate actions/requirements specified in the TSR Required Actions nor is there any credit taken in the PGDP SAR accident analysis for HP actions/requirements to prevent or mitigate any postulated accident

scenario. Therefore, continuous HP 24-hour support is not required with the enrichment cascade and UF<sub>6</sub> feed, withdrawal, transfer and sampling facilities shutdown. Laboratory operations may continue on the back shift without continuous HP support. The proposed change to the C-310 minimum staffing when the purge cascade is shut down and UF<sub>6</sub> removed will be consistent with the minimum staffing for the enrichment cascade facilities (C-331, C-333, C-335 and C-337) when it is shut down and UF<sub>6</sub> removed since they share the same SAR accident analysis and TSRs, and thus the same actions/requirements. The proposed minimum staffing requirements are consistent with the number of operations staff required to safely operate the facility during normal and accident conditions.

5. No Significant Decrease in the Effectiveness of Any Programs or Plans Contained in the Certificate Application

The proposed changes to TSR Table 3.2.2-1 do not impact or change any programs or plans in the certificate application. It has been determined that the minimum number of staff specified in TSRs for HP continuous coverage can be removed and the C-310 minimum staffing revised as proposed above without adversely affecting the safety of the facilities regulated operations.

Since the proposed TSR HP minimum staffing requirement changes do not alter the response actions and mitigative functions that are addressed in the Emergency Plan (EP) and its implementing procedures and facility Emergency Response Plans, there is no decrease in the effectiveness of the Emergency Plan.

The proposed changes to the C-310 minimum staffing will allow zero staffing when specific conditions in the C-310 withdrawal process and the C-310 purge cascade are met. This will impact where and how plant or facility alerts/notifications/announcements will be made in C-310. Although there may be no minimum staffing requirements for C-310, there still may be personnel in the facility that need to be notified of emergencies or other important announcements. Therefore, the EP implementing procedures and Emergency Response Plans will be impacted by the proposed changes to the minimum staffing requirements for C-310 and will be revised as necessary when the proposed change is approved. The EP does not specify or discuss the details of how emergency or other important notifications are relayed to plant personnel. Therefore, there is no decrease in the effectiveness of the EP resulting from the proposed change to C-310 TSR minimum staffing.

Therefore, the proposed changes will not decrease the effectiveness of any programs or plans contained in the Certificate Application.

6. The Proposed Changes do not Result in Undue Risk to 1) Public Health and Safety, 2) Common Defense and Security, and 3) the Environment

Due to the fact that there is no significant increase in the probability or consequences of any accident previously analyzed and no new or different type of accident, as discussed

in items 2 and 3 above, there will be no undue risk to the public health and safety due to the proposed changes. In addition, the proposed changes will have no impact on plant effluents or on the programs and plans in place to implement physical security, protection of classified matter, transportation security, or special nuclear material accountability.

Therefore, the proposed changes to the TSRs will not pose any undue risk to the public health and safety, common defense and security, or the environment.

7. No Change in the Types or Significant Increase in the Amounts of Any Effluents that May be Released Off-Site

The proposed changes to the TSR and SAR do not involve any physical change to the plant or changes to plant operations that could change the types or increase the amounts of any effluents that may be released offsite.

Therefore, the proposed changes do not change the type or significantly increase the amount of effluents that may be released offsite.

8. No Significant Increase in Individual or Cumulative Occupational Radiation Exposure

The proposed changes to the TSR and SAR will not affect the radiological protection program description or the actions in place to minimize occupational exposures.

Therefore, there is no significant increase in individual or cumulative occupational radiation exposure as a result of the proposed changes.

9. No Significant Construction Impact

These proposed changes will not require any construction. The proposed changes to TSR Table 3.2.2-1 and SAR Section 6.5 has no construction impact.

Therefore, since there is no construction, there are no significant construction impacts associated with the proposed changes.