

## NRR-PMDAPem Resource

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**From:** Sterling, Lance <lsterling@STPEGS.COM>  
**Sent:** Wednesday, February 10, 2016 9:26 AM  
**To:** Regner, Lisa  
**Subject:** [External\_Sender] RE: Follow-up on EP Plan change non-acceptance

Thank you Lisa.

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**From:** Regner, Lisa [mailto:Lisa.Regner@nrc.gov]  
**Sent:** Wednesday, February 10, 2016 8:20 AM  
**To:** Sterling, Lance  
**Subject:** Follow-up on EP Plan change non-acceptance

Lance,

I was going through old emails and believe I was supposed to send you more information on why we rejected your 120 minute EP plan request. Below are excerpts of what NSIR provided to me.

Lisa

Because of the extensive nature of the information needed, the NRC staff finds the request for approval of the proposed action unacceptable for NRC review pursuant to 10 CFR 2.101. NRC staff activities on the review have ceased and the associated Cost Activity Code number has been closed, therefore, this does not represent a complete list of inconsistencies and errors. Correction of these items does not assure a future license amendment request will be acceptable; the NRC staff will evaluate each submitted license request on its individual merits.

- No evaluation was provided regarding whether a delay in staffing of the Technical Support Center and Emergency Operations Facility, from 60 to 120 minutes at the Alert and Site Area Emergency declarations, respectively, will affect State and local emergency plans. No correspondence was provided by the licensee summarizing its discussions with State and local response organizations on potential impacts and no documentation of their acceptance. [NOTE: Any change to the licensee's emergency plan that impacts or has the potential to impact State and local response actions will be provided to the Federal Emergency Management Agency for review to verify that continued reasonable assurance that State and local emergency plans can be implemented. As such, an adequate evaluation, and documentation of coordination with offsite response organization (if applicable), needs to be provided as part of submittal.]
- The application provides a technical evaluation using personnel required by other programs or procedures in excess of what is currently on the Table C-1, "Minimum Staffing Requirements (STPEGS [South Texas Project Electric Generating Station])." Specifically, Section 2.2, "Background (Emergency Response Organization Augmentation Time Revision)," states, in part, that:

Attachment 2 provides the basis for and assurance that the health and safety of the public is maintained during a radiological event with the on-shift designated [Radiation Protection (RP)], Chemistry and [Duty Maintenance Supervisor (DMS)] resources... STPNOC maintains one Mechanic, two Electricians, and one Instrument and Control Technician on-shift for repair and corrective actions with no collateral duties.

The following additional personnel are not on Table C-1 of the proposed plan:

- Duty Maintenance Supervisor

- One (1) Mechanical Maintenance
  - One (1) additional Electrical Maintenance
- The application does not provide an evaluation of the tasks performed by the augmenting personnel in the major functional areas on Table C-1. There is only an evaluation that the on-shift staff can perform operational and emergency response tasks for the first 120 minutes using two accident scenarios. The request only extends the augmentation time without any compensatory measures being identified or considered.
  - The application states that the proposed revision would change the staff augmentation times from 60 and 75 minutes from the *time of notification* to approximately 120 minutes from *time of event declaration*. It further provides that the current ERO augmentation times of 60 and 75 minutes were approved by NRC safety evaluation (SE) dated May 20, 1993 (ADAMS Legacy Accession No. 9305280305).

The SE dated May 20, 1993, documented the NRC's review of proposed changes submitted by letter dated November 3, 1992 (ADAMS Legacy Accession No. 9211100343), by the Houston Lighting & Power Company. The letter stated, in part, that:

The STP Emergency Plan currently provides the number of personnel expected to be available in 45 minutes and 60 minutes following an *emergency declaration* [emphasis added]. The proposed change extends the time by 15 minutes to 60 minutes and 75 minutes, respectively.

The SE dated May 20, 1993, provided stated that the current response times of 45 and 60 minutes would be increase by 15 minutes following an *emergency declaration*.

Revision 16 to the STPEGS Emergency Plan, issued March 1, 1994 (ADAMS Legacy Accession No. 9404010059), provided the following in Section C.4:

Those members of the Emergency Response Organization who are not on site at the time of the emergency shall be able to augment the Onshift Response Organization within approximately 60 to 75 minutes of *being notified* [emphasis added] as specified in Table C-2 to provide manning levels recommended in NUREG-0654 ["Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1].

The information in the current application appears to be inconsistent with requested change approved by the NRC in the SE dated May 20, 1993, referenced above.

- The proposed plan change does not consider any other possible means to facilitate timely ERO staff augmentation, other than increasing response times. The application does not describe whether the licensee considered relocation of existing facilities, use of an alternate facility, or potential considerations such as virtual staffing, etc., to support timely ERO augmentation staffing.
- Based on the NRC staff's review, it is not apparent that the licensee considered the guidance provided in the Emergency Preparedness Frequently Asked Questions (EPFAQ) 2014-002 dated March 18, 2015 (ADAMS Accession No. ML15076A259), nor the information discussed between the staff and industry during the September 24, 2015, EPFAQ Public Meeting (ADAMS Accession No. ML15278A194).

**Lisa Regner**  
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**Email Number:** 2650

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**Sent Date:** 2/10/2016 9:26:02 AM  
**Received Date:** 2/10/2016 9:25:25 AM  
**From:** Sterling, Lance

**Created By:** lsterling@STPEGS.COM

**Recipients:**  
"Regner, Lisa" <Lisa.Regner@nrc.gov>  
Tracking Status: None

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