



**Nebraska Public Power District**

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NLS2016011  
February 26, 2016

50.54(q)

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

Subject: Emergency Plan Implementing Procedures  
Cooper Nuclear Station, Docket No. 50-298, DPR-46

Dear Sir or Madam:

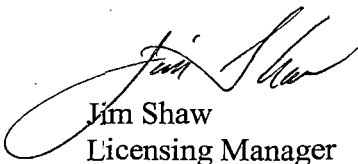
The purpose of this letter is to report a change to the following Emergency Plan Implementing Procedures (EPIP) and provide a summary of the associated 10 CFR 50.54(q) analyses for the changes to the EPIPs:

EPIP 5.7.2	Revision 34	Emergency Director EPIP
EPIP 5.7.9	Revision 35	Activation of EOF
EPIP 5.7.23	Revision 17	Activation of the Joint Information Center (JIC)
EPIP 5.7COMMUN	Revision 27	Communications
EPIP 0-EP-01	Revision 28	Emergency Response Organization
		Responsibilities
EPIP 0-EP-02	Revision 5	Configuration Control of the Automated
		Notification System (ANS)
EPIP 5.7.1	Revision 53	Emergency Classification

This letter contains no commitments.

If you have any questions regarding this submittal, please contact me at (402) 825-2788.

Sincerely,

  
Jim Shaw  
Licensing Manager

/bk

AK45  
VRR

- Attachments:
1. Report of Change and Summary of 50.54(q) Analyses - Emergency Plan Implementing Procedure 5.7.2, Revision 34
  2. Report of Change and Summary of 50.54(q) Analysis - Emergency Plan Implementing Procedure 5.7.9, Revision 35
  3. Report of Change and Summary of 50.54(q) Analysis - Emergency Plan Implementing Procedure 5.7.23, Revision 17
  4. Report of Change and Summary of 50.54(q) Analysis - Emergency Plan Implementing Procedure 5.7COMMUN, Revision 27
  5. Report of Change and Summary of 50.54(q) Analyses - Emergency Plan Implementing Procedure 0-EP-01, Revision 28
  6. Report of Change and Summary of 50.54(q) Analysis - Emergency Plan Implementing Procedure 0-EP-02, Revision 5
  7. Report of Change - Emergency Plan Implementing Procedure 5.7.1, Revision 53

- Enclosures:
1. Emergency Plan Implementing Procedure 5.7.2, Revision 34
  2. Emergency Plan Implementing Procedure 5.7.9, Revision 35
  3. Emergency Plan Implementing Procedure 5.7.23, Revision 17
  4. Emergency Plan Implementing Procedure 5.7COMMUN, Revision 27
  5. Emergency Plan Implementing Procedure 0-EP-01, Revision 28
  6. Emergency Plan Implementing Procedure 0-EP-02, Revision 5
  7. Emergency Plan Implementing Procedure 5.7.1, Revision 53

cc: Regional Administrator, w/ attachments and enclosures (2)  
USNRC – Region IV

Director, Spent Fuel Project Office, w/ attachments and enclosures  
Office of Nuclear Material Safety and Safeguards

Senior Resident Inspector, w/ attachments (enclosures per controlled document distribution)  
USNRC – CNS

NPG Distribution, w/ attachments and w/o enclosures

CNS Records, w/ attachments and w/o enclosures

## Attachment 1

### Report of Change and Summary of 50.54(q) Analyses – Emergency Plan Implementing Procedure 5.7.2, Revision 34

#### Change 1 Description

Revision 34 of Emergency Implementing Procedure (EPIP) 5.7.2 consolidated the Emergency Director (ED) position instruction manual into Attachment 7, EOF ED Flowchart, and also moved instructions from Section 3 of the EPIP into the Emergency Operations Facility (EOF) Flowchart. This change is considered a total rewrite to meet new format and performance guidance provided in the station's procedure writer's guide. Section/step sequence changes were made where appropriate, notes that contained actions were changed to procedure steps, and steps were rewritten to improve human performance.

#### Change 1 Summary of Analysis (10 CFR 50.54(q) evaluation)

##### Licensing Basis Affected by Change:

Cooper Nuclear Station (CNS) Emergency Plan (E-Plan), Section 1.4, provides the definition of the Control Room.

E-Plan, Section 1.8, provides the definition of the EOF.

E-Plan, Section 4.1.2.2, describes that notifications will be made at an Alert classification.

E-Plan, Section 5.1.2.1, discusses the responsibilities of the Shift Manager.

E-Plan, Section 5.2, discusses the key elements of the Emergency Response Organization (ERO) and states that the Technical Support Center, EOF, and Operational Support Center will be manned and activated at the declaration of an Alert or higher level emergency.

E-Plan, Section 5.2.1, discusses the responsibilities of the ED.

E-Plan, Section 7.1, describes the Control Room.

E-Plan, Section 7.2.3, describes the EOF.

##### How Change Complies with Regulations and Previous Commitments:

This change restructured EPIP 5.7.2 and added attachments with flowcharts. ERO primary responsibilities were not impacted by the change and no regulatory requirements or commitments were affected.

Affected Emergency Planning Functions/Impact on Effectiveness of Emergency Planning Functions:

10 CFR 50.47(b)(1); Function - Responsibility for emergency response is assigned.

10 CFR 50.47(b)(1); Function - The response organization has the staff to respond and to augment staff on a continuing basis in accordance with the emergency plan.

10 CFR 50.47(b)(2); Function - The process ensures that on-shift emergency response responsibilities are staffed and assigned.

10 CFR 50.47(b)(2); Function - The process for timely augmentation of on-shift staff is established and maintained.

The change does not decrease the ability of CNS to staff, respond, or augment staff on a continuing 24/7 basis and does not impact the process used for timely augmentation of on-shift staff. As such, the change does not constitute a reduction in the effectiveness of the CNS E-Plan.

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**Change 2 Description**

The Automated Notification System (ANS) is the primary method/equipment used for notification of CNS' emergency response personnel. A new vendor hosted system upgrade was implemented which provides 100 inbound vendor telephone lines and 500 outbound vendor telephone lines for ERO notification and response. The system consists of two redundant primary and backup systems, which are physically located in two separate data centers and shares no common infrastructure in order to ensure that no single failure can render both a primary and backup server unavailable. EPIP 5.7.2 was revised to reflect implementation of the new system.

**Change 2 Summary of Analysis (10 CFR 50.54(q) evaluation)**

Licensing Basis Affected by Change:

CNS E-Plan, Section 6.2, discusses notification and activation of the ERO including notification of on-site plant personnel, off-site plant personnel, and the Joint Information Center.

E-Plan, Section 7.4, discusses notification schemes by emergency classification.

The change complies with ERO notification and activation requirements as described in the E-Plan.

How Change Complies with Regulations and Previous Commitments:

10 CFR 50, Appendix E, Section IV.C.1, requires that the entire spectrum of emergency conditions that involve the alerting or activating of progressively larger segments of the total emergency organization shall be described. This requirement continues to be described in the E-Plan and implementing procedures. The new ANS includes more telephone lines and device contact capability for faster notification.

10 CFR 50, Appendix E, Sections IV.E.9, requires that all communication plans have arrangements for emergencies including titles and alternates for those in charge at both ends of the communication links and the primary and backup means of communication. The new ANS is a more reliable and faster communications link, and provides for an additional ANS backup method for ERO notification. The change complies with this regulation.

10 CFR 50.47(b)(6), requires provisions exist for prompt communications among principal response organizations to emergency personnel and the public. The change complies with this regulation as these provisions for prompt communication continue to exist. Further, communications capability is enhanced due to the system being more reliable and faster because of additional lines, device contact capability, and additional back-up for emergency personnel notification.

10 CFR 50.47(b)(8), requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained. The change complies with this requirement as emergency response equipment continues to be adequate and is enhanced due to the system being more reliable and faster. Emergency facilities are not impacted by this change.

Commitments associated with ERO personnel response, alternate assembly areas, ERO activation, corporate office personnel pagers, and ANS pager codes, were reviewed. The change does not conflict with or negatively impact these commitments.

Affected Emergency Planning Functions/Impact on Effectiveness of Emergency Planning Functions:

10 CFR 50.47(b)(6); Function - Systems are established for prompt communication among principal emergency response organizations.

10 CFR 50.47(b)(6); Function - Systems are established for prompt communication to emergency response personnel.

10 CFR 50.47(b)(8); Function - Adequate facilities are maintained to support emergency response.

10 CFR 50.47(b)(8); Function - Adequate equipment is maintained to support emergency response.

As noted above, emergency equipment and communications are enhanced as the system is more reliable and faster with additional telephone lines and backup capability for emergency response personnel notification. Emergency communications to the public and emergency facilities are not impacted by this change. The change does not represent a reduction in effectiveness of the CNS E-Plan.

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**Other Changes**

Other changes were also made to the EPIP that were determined to be editorial or did not affect an emergency planning element/function. These changes did not require a 10 CFR 50.54(q) evaluation.

## **Attachment 2**

### **Report of Change and Summary of 50.54(q) Analysis – Emergency Plan Implementing Procedure 5.7.9, Revision 35**

#### **Change Description**

Revision 35 of Emergency Implementing Procedure (EPIP) 5.7.9 consolidated the Emergency Operations Facility (EOF) Director position instruction manual into the EPIP and added instruction in new attachments for EOF activation (hard card), Nuclear Regulatory Commission and State initial briefing, and EOF director (action flowchart). This change is considered a total rewrite to meet new format and performance guidance provided in the station's procedure writer's guide. Section/step sequence changes were made where appropriate, notes that contained actions were changed to procedure steps, and steps were rewritten to improve human performance.

#### **Change Summary of Analysis (10 CFR 50.54(q) evaluation)**

##### Licensing Basis Affected by Change:

Cooper Nuclear Station (CNS) Emergency Plan (E-Plan), Section 1.8, provides the definition of the EOF.

E-Plan, Section 4.1.2.2, describes that notifications will be made at an Alert classification.

E-Plan, Section 5.1.2.1, discusses the responsibilities of the Shift Manager.

E-Plan, Section 5.2, discusses the key elements of the Emergency Response Organization (ERO) and states that the Technical Support Center, EOF, and Operational Support Center will be manned and activated at the declaration of an Alert or higher level emergency.

E-Plan, Section 5.2.3, discusses the responsibilities of the EOF Director.

E-Plan, Section 7.2.3, describes the EOF.

##### How Change Complies with Regulations and Previous Commitments:

This change restructured EPIP 5.7.9 and added attachments with flowcharts. ERO primary responsibilities were not impacted by the change and no regulatory requirements or commitments were affected.

##### Affected Emergency Planning Functions/Impact on Effectiveness of Emergency Planning Functions:

10 CFR 50.47(b)(1); Function - Responsibility for emergency response is assigned.

10 CFR 50.47(b)(1); Function - The response organization has the staff to respond and to

augment staff on a continuing basis in accordance with the emergency plan.

10 CFR 50.47(b)(2); Function - The process ensures that on-shift emergency response responsibilities are staffed and assigned.

10 CFR 50.47(b)(2); Function - The process for timely augmentation of on-shift staff is established and maintained.

The change does not decrease the ability of CNS to staff, respond, or augment staff on a continuing 24/7 basis and does not impact the process used for timely augmentation of on-shift staff. As such, the change does not constitute a reduction in the effectiveness of the CNS E-Plan.

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### **Other Changes**

Other changes were also made to the EPIP that were determined to be editorial. These changes did not require a 10 CFR 50.54(q) evaluation.

### **Attachment 3**

## **Report of Change and Summary of 50.54(q) Analysis – Emergency Plan Implementing Procedure 5.7.23, Revision 17**

### **Change Description**

This change is considered a total rewrite of Emergency Plan Implementing Procedure (EPIP) 5.7.23 to meet new format and performance guidance provided in the station's procedure writer's guide. Section/step sequence changes were made where appropriate, notes that contained actions were changed to procedure steps, steps were rewritten to improve human performance, and commitment annotation was corrected. Also, certain position responsibilities for the Joint Information Center (JIC) were moved to another EPIP to streamline the activation process.

### **Change Summary of Analysis (10 CFR 50.54(q) evaluation)**

#### Licensing Basis Affected by Change:

Cooper Nuclear Station (CNS) Emergency Plan (E-Plan), Section 1.13, provides the definition of the JIC.

E-Plan, Section 4.1.3.2, describes actions taken upon declaration of a Site Area Emergency, including activation of the JIC.

E-Plan, Table 4.1-6, lists expected actions of CNS and State/Local organizations at an Alert classification, including placing the JIC on standby status.

E-Plan, Table 4.1-7, lists expected actions of CNS and State/Local organizations at a Site Area Emergency classification, including activation of the JIC and other emergency response facilities.

E-Plan, Table 4.1-8, lists expected actions of CNS and State/Local organizations at a General Emergency, including activation of the JIC and other emergency response facilities.

E-Plan, Section 5.2, discusses the key elements of the Emergency Response Organization and when the emergency response facilities will be manned and activated.

E-Plan, Section 5.3.1 and describes the JIC and its principal functions.

E-Plan, Section 5.3.3.1, describes the responsibilities of the JIC Director.

E-Plan, Section 5.3.2, discusses the coordination of emergency public information and its release through the JIC.

E-Plan, Figure 5.3-1, depicts the JIC and staff positions.



E-Plan, Section 6.2.3, discusses that depending upon the situation, the JIC may be activated in accordance with EPIP 5.7.23.

E-Plan, Section 7.2.4, describes JIC responsibilities and its means for communicating with other emergency response facilities and State Emergency Operations Centers.

How Change Complies with Regulations and Previous Commitments:

This change restructured EPIP 5.7.23 and provided additional guidance to ensure that JIC functions are performed efficiently. The change is consistent with CNS E-Plan requirements and responsibilities and continues to meet relevant emergency preparedness regulations and regulatory commitments.

Affected Emergency Planning Functions/Impact on Effectiveness of Emergency Planning Functions:

10 CFR 50.47(b)(1); Function - Responsibility for emergency response is assigned.

10 CFR 50.47(b)(1); Function - The response organization has the staff to respond and to augment staff on a continuing basis in accordance with the emergency plan.

10 CFR 50.47(b)(2); Function - The process ensures that on-shift emergency response responsibilities are staffed and assigned.

10 CFR 50.47(b)(2); Function - The process for timely augmentation of on-shift staff is established and maintained.

10 CFR 50.47(b)(7); Function - Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway EPZ.

10 CFR 50.47(b)(7); Function - Coordinated dissemination of public information during emergencies is established.

The change does not decrease the ability of CNS to staff, respond, or augment staff on a continuing 24/7 basis and does not impact the process used for timely augmentation of on-shift staff, nor does it reduce the capability of CNS to disseminate information to the public in a timely and accurate manner during emergencies. In conclusion, the change does not constitute a reduction in the effectiveness of the CNS E-Plan.

## Attachment 4

### Report of Change and Summary of 50.54(q) Analysis – Emergency Plan Implementing Procedure 5.7COMMUN, Revision 27

#### Change Description

The Automated Notification System (ANS) is the primary method/equipment used for notification of Cooper Nuclear Station's (CNS) emergency response personnel. A new vendor hosted system upgrade was implemented which provides 100 inbound vendor telephone lines and 500 outbound vendor telephone lines for emergency response organization (ERO) notification and response. The system consists of two redundant primary and backup systems, which are physically located in two separate data centers and shares no common infrastructure in order to ensure that no single failure can render both a primary and backup server unavailable. Emergency Plan Implementing Procedure 5.7COMMUN was revised to reflect implementation of the new system.

#### Change Summary of Analysis (10 CFR 50.54(q) evaluation)

##### Licensing Basis Affected by Change:

CNS Emergency Plan (E-Plan), Section 6.2, discusses notification and activation of the ERO including notification of on-site plant personnel, off-site plant personnel, and the Joint Information Center.

E-Plan, Section 7.4, discusses notification schemes by emergency classification.

The change complies with ERO notification and activation requirements as described in the E-Plan.

##### How Change Complies with Regulations and Previous Commitments:

10 CFR 50, Appendix E, Section IV.C.1, requires that the entire spectrum of emergency conditions that involve the alerting or activating of progressively larger segments of the total emergency organization shall be described. This requirement continues to be described in the E-Plan and implementing procedures. The new ANS includes more telephone lines and device contact capability for faster notification.

10 CFR 50, Appendix E, Sections IV.E.9, requires that all communication plans have arrangements for emergencies including titles and alternates for those in charge at both ends of the communication links and the primary and backup means of communication. The new ANS is a more reliable and faster communications link, and provides for an additional ANS backup method for ERO notification. The change complies with this regulation.

10 CFR 50.47(b)(6), requires provisions exist for prompt communications among principal response organizations to emergency personnel and the public. The change complies with this

regulation as these provisions for prompt communication continue to exist. Further, communications capability is enhanced due to the system being more reliable and faster because of additional lines, device contact capability, and additional back-up for emergency personnel notification.

10 CFR 50.47(b)(8), requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained. The change complies with this requirement as emergency response equipment continues to be adequate and is enhanced due to the system being more reliable and faster. Emergency facilities are not impacted by this change.

Commitments associated with ERO personnel response, alternate assembly areas, ERO activation, corporate office personnel pagers, and ANS pager codes, were reviewed. The change does not conflict with or negatively impact these commitments.

Affected Emergency Planning Functions/Impact on Effectiveness of Emergency Planning Functions:

10 CFR 50.47(b)(6); Function - Systems are established for prompt communication among principal emergency response organizations.

10 CFR 50.47(b)(6); Function - Systems are established for prompt communication to emergency response personnel.

10 CFR 50.47(b)(8); Function - Adequate facilities are maintained to support emergency response.

10 CFR 50.47(b)(8); Function - Adequate equipment is maintained to support emergency response.

As noted above, emergency equipment and communications are enhanced as the system is more reliable and faster with additional telephone lines and backup capability for emergency response personnel notification. Emergency communications to the public and emergency facilities are not impacted by this change. The change does not represent a reduction in effectiveness of the CNS E-Plan.

## Attachment 5

### Report of Change and Summary of 50.54(q) Analyses – Emergency Plan Implementing Procedure 0-EP-01, Revision 28

#### Change 1 Description

This change updated company titles for Burns & Roe and Stone & Webster in Emergency Plan Implementing Procedure (EPIP) 0-EP-01.

#### Change 1 Summary of Analysis (10 CFR 50.54(q) evaluation)

##### Licensing Basis Affected by Change:

Cooper Nuclear Station (CNS) Emergency Plan (E-Plan), Section 5.3.3, describes the support the Emergency Response Organization may draw on from outside of Nebraska Public Power District.

E-Plan, Section 5.3.3.2, provides an example of companies that could be called upon to provide technical assistance to CNS, and Section 5.2.2.2 provides a description of other contract services the Engineering Coordinator can coordinate with to help mitigate the consequences of an event.

##### How Change Complies with Regulations and Previous Commitments:

10 CFR 50.47(b)(3), requires that arrangements for requesting and effectively using assistance resources are made, arrangements to accommodate State and local staff at the licensee's Emergency Operations Facility are made, and other organizations capable of augmenting the planned response are identified.

10 CFR 50, Appendix E, Sections IV.A.6, requires a description of the local off-site services to be provided in support of the licensee's emergency organization.

The change in company names does not reduce CNS' ability to meet the above regulatory requirements.

##### Affected Emergency Planning Functions/Impact on Effectiveness of Emergency Planning Functions:

10 CFR 50.47(b)(3); Function - Arrangements for requesting and using off-site assistance have been made.

10 CFR 50.47(b)(3); Function - State and local staff can be accommodated at the EOF in accordance with the E-Plan.

Representatives from both the new companies, CB&I - Stone & Webster and Power Engineers, were contacted and affirmed the same type of services, previously offered by the former

companies, would still be available if needed by CNS during a declared emergency. Therefore, this change does not constitute a reduction in the effectiveness of the CNS E-Plan.

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## **Change 2 Description**

The Automated Notification System (ANS) is the primary method/equipment used for notification of CNS' emergency response personnel. A new vendor hosted system upgrade was implemented which provides 100 inbound vendor telephone lines and 500 outbound vendor telephone lines for emergency response organization (ERO) notification and response. The system consists of two redundant primary and backup systems, which are physically located in two separate data centers and shares no common infrastructure in order to ensure that no single failure can render both a primary and backup server unavailable. Emergency Plan Implementing Procedure 0-EP-01 was revised to reflect implementation of the new system.

## **Change 2 Summary of Analysis (10 CFR 50.54(q) evaluation)**

### Licensing Basis Affected by Change:

CNS E-Plan, Section 6.2, discusses notification and activation of the ERO including notification of on-site plant personnel, off-site plant personnel, and the Joint Information Center.

E-Plan, Section 7.4, discusses notification schemes by emergency classification.

The change complies with ERO notification and activation requirements as described in the E-Plan.

### How Change Complies with Regulations and Previous Commitments:

10 CFR 50, Appendix E, Section IV.C.1, requires that the entire spectrum of emergency conditions that involve the alerting or activating of progressively larger segments of the total emergency organization shall be described. This requirement continues to be described in the E-Plan and implementing procedures. The new ANS includes more telephone lines and device contact capability for faster notification.

10 CFR 50, Appendix E, Sections IV.E.9, requires that all communication plans have arrangements for emergencies including titles and alternates for those in charge at both ends of the communication links and the primary and backup means of communication. The new ANS is a more reliable and faster communications link, and provides for an additional ANS backup method for ERO notification. The change complies with this regulation.

10 CFR 50.47(b)(6), requires provisions exist for prompt communications among principal response organizations to emergency personnel and the public. The change complies with this regulation as these provisions for prompt communication continue to exist. Further, communications capability is enhanced due to the system being more reliable and faster because of additional lines, device contact capability, and additional back-up for emergency personnel notification.

10 CFR 50.47(b)(8), requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained. The change complies with this requirement as emergency response equipment continues to be adequate and is enhanced due to the system being more reliable and faster. Emergency facilities are not impacted by this change.

Commitments associated with ERO personnel response, alternate assembly areas, ERO activation, corporate office personnel pagers, and ANS pager codes, were reviewed. The change does not conflict with or negatively impact these commitments.

Affected Emergency Planning Functions/Impact on Effectiveness of Emergency Planning Functions:

10 CFR 50.47(b)(6); Function - Systems are established for prompt communication among principal emergency response organizations.

10 CFR 50.47(b)(6); Function - Systems are established for prompt communication to emergency response personnel.

10 CFR 50.47(b)(8); Function - Adequate facilities are maintained to support emergency response.

10 CFR 50.47(b)(8); Function - Adequate equipment is maintained to support emergency response.

As noted above, emergency equipment and communications are enhanced as the system is more reliable and faster with additional telephone lines and backup capability for emergency response personnel notification. Emergency communications to the public and emergency facilities are not impacted by this change. The change does not represent a reduction in effectiveness of the CNS E-Plan.

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**Other Changes**

Other changes were also made to the EPIP that were determined to be editorial or did not affect an emergency planning element/function. These changes did not require a 10 CFR 50.54(q) evaluation.

## Attachment 6

### Report of Change and Summary of 50.54(q) Analysis – Emergency Plan Implementing Procedure 0-EP-02, Revision 5

#### Change Description

The Automated Notification System (ANS) is the primary method/equipment used for notification of Cooper Nuclear Station's (CNS) emergency response personnel. A new vendor hosted system upgrade was implemented which provides 100 inbound vendor telephone lines and 500 outbound vendor telephone lines for emergency response organization (ERO) notification and response. The system consists of two redundant primary and backup systems, which are physically located in two separate data centers and shares no common infrastructure in order to ensure that no single failure can render both a primary and backup server unavailable. Emergency Plan Implementing Procedure (EPIP) 0-EP-02 was revised to reflect implementation of the new system.

#### Change Summary of Analysis (10 CFR 50.54(q) evaluation)

##### Licensing Basis Affected by Change:

CNS Emergency Plan (E-Plan), Section 6.2, discusses notification and activation of the ERO including notification of on-site plant personnel, off-site plant personnel, and the Joint Information Center.

E-Plan, Section 7.4, discusses notification schemes by emergency classification.

The change complies with ERO notification and activation requirements as described in the E-Plan.

##### How Change Complies with Regulations and Previous Commitments:

10 CFR 50, Appendix E, Section IV.C.1, requires that the entire spectrum of emergency conditions that involve the alerting or activating of progressively larger segments of the total emergency organization shall be described. This requirement continues to be described in the E-Plan and implementing procedures. The new ANS includes more telephone lines and device contact capability for faster notification.

10 CFR 50, Appendix E, Sections IV.E.9, requires that all communication plans have arrangements for emergencies including titles and alternates for those in charge at both ends of the communication links and the primary and backup means of communication. The new ANS is a more reliable and faster communications link, and provides for an additional ANS backup method for ERO notification. The change complies with this regulation.

10 CFR 50.47(b)(6), requires provisions exist for prompt communications among principal response organizations to emergency personnel and the public. The change complies with this

regulation as these provisions for prompt communication continue to exist. Further, communications capability is enhanced due to the system being more reliable and faster because of additional lines, device contact capability, and additional back-up for emergency personnel notification.

10 CFR 50.47(b)(8), requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained. The change complies with this requirement as emergency response equipment continues to be adequate and is enhanced due to the system being more reliable and faster. Emergency facilities are not impacted by this change.

Commitments associated with ERO personnel response, alternate assembly areas, ERO activation, corporate office personnel pagers, and ANS pager codes, were reviewed. The change does not conflict with or negatively impact these commitments.

Affected Emergency Planning Functions/Impact on Effectiveness of Emergency Planning Functions:

10 CFR 50.47(b)(6); Function - Systems are established for prompt communication among principal emergency response organizations.

10 CFR 50.47(b)(6); Function - Systems are established for prompt communication to emergency response personnel.

10 CFR 50.47(b)(8); Function - Adequate facilities are maintained to support emergency response.

10 CFR 50.47(b)(8); Function - Adequate equipment is maintained to support emergency response.

As noted above, emergency equipment and communications are enhanced as the system is more reliable and faster with additional telephone lines and backup capability for emergency response personnel notification. Emergency communications to the public and emergency facilities are not impacted by this change. The change does not represent a reduction in effectiveness of the CNS E-Plan.

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**Other Changes**

Other changes were also made to the EPIP that were determined to be editorial or did not affect an emergency planning element/function. These changes did not require a 10 CFR 50.54(q) evaluation.



**Attachment 7**

**Report of Change –  
Emergency Plan Implementing Procedure 5.7.1, Revision 53**

**Change Description**

Changes were made to Emergency Plan Implementing Procedure 5.7.1 that were determined to be editorial or did not affect an emergency planning element/function. These changes did not require a 10 CFR 50.54(q) evaluation.