

July 5, 2016

Vanessa Quinn, Chief
Radiological Emergency Preparedness Branch
Technological Hazards Division
Federal Emergency Management Agency
1800 South Bell Street
Arlington, VA 20598-3025

SUBJECT: REQUEST FROM SOUTHERN NUCLEAR COMPANY FOR APPROVAL TO
ADOPT A STANDARD EMERGENCY PLAN FOR THE JOSEPH M. FARLEY,
EDWIN I. HATCH AND VOGTLE NUCLEAR PLANT SITES

Dear Ms. Quinn:

This letter serves as a follow-up to my December 8, 2015 correspondence (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15337A420), requesting a review by the Federal Emergency Management Agency (FEMA) of the proposed changes that may potentially impact off-site response organizations' (ORO) radiological emergency preparedness (REP) plans. FEMA is also requested to provide the U.S. Nuclear Regulatory Commission (NRC) an evaluation of whether the changes would preclude offsite agencies from implementing their approved REP plans.

In an e-mail dated January 11, 2016, I provided the proposed Southern Nuclear Company (SNC) Standard Emergency Plan (SEP), the corporate Joint Information Center (JIC) description and evaluation, and the letters of consultation and concurrence from the various State and county emergency response organizations. I noted that, while these letters documented a general concurrence with the changes proposed by SNC under the SEP approach, they did not specifically acknowledge potential changes needed to offsite REP plans to include the consolidation of the JIC, as outlined in SNC's submittal. As such, to facilitate our continued review, we requested SNC to specifically confirm with the appropriate OROs, their concurrence with the corporate JICs and their intent to revise their respective REP plans, as appropriate. Also, SNC was requested to identify any specific changes under the proposed SNC SEP that may have an impact on the current FEMA approved REP plans and document concurrence by appropriate OROs of the proposed changes.

As a result of our request, we have received additional information from SNC, to include the following:

1. The SNC submittal dated August 31, 2015, contained provisions for designating the Alabama Power Company and Georgia Power Company Corporate Media Centers (CMCs), located in Birmingham, Alabama, and Atlanta, Georgia respectively, as the official JICs until such time as the near site JIC could be established. This proposal included prescribing a minimum activation time for this facility of 75 minutes.

Moving the JIC to the CMC locations was intended to facilitate meeting the 75-minute minimum staff augmentation time.

Subsequently, SNC has decided not to propose these changes to the JIC process, as originally described to the NRC in Enclosure 3 of their submittal dated August 31, 2015. As such, SNC's practice for coordination and dissemination of information to the public via the near site JICs, as provided in the current SNC emergency plans and the State and county REP plans, will remain unchanged in the SNC SEP.

2. SNC performed a detailed review of the relevant ORO REP plans to identify potential impacts resulting from the proposed SNC SEP. Only minor editorial changes related to the SNC emergency plan document titles were identified. Nonetheless, SNC held additional discussions with the OROs to provide further clarification and answer any questions. Specifically, in addition to covering the exact changes that would be needed to the ORO REP plans, SNC and the OROs discussed details of the personnel interfaces and coordination necessary to effectively implement the plans during an emergency. Updated letters of concurrence from the following agencies are enclosed documenting the OROs concurrence that there are no adverse impacts to their respective REP plans from the proposed SNC fleet SEP:

- State of Alabama Department of Public Health,
- State of Alabama Emergency Management Agency (EMA),
- Aiken County (SC) Department of Emergency Services,
- Allendale County (SC) EMA,
- Appling County (GA) EMA,
- Barnwell County (SC) Emergency Management,
- Blakely-Early County (GA) EMA,
- Burke County (GA) EMA,
- State of Georgia Department of Natural Resources,
- State of Georgia EMA,
- Henry County (AL) EMA,
- Dothan/Houston County (AL) EMA,
- Jeff Davis County (GA) EMA,
- State of South Carolina Department of Health and Environmental Control,
- State of South Carolina Emergency Management Division,
- Savannah River Site (Department of Energy),
- Tatnall County (GA) EMA, and
- Toombs County (GA) EMA.

These letters of concurrence replace the ORO concurrence letters originally submitted. Savannah River Site (SRS) has elected not to provide a follow-up response to their initial acknowledgement letter in keeping with SRS's position that, as a Department of Energy facility, a simple "acknowledgement" letter is appropriate rather than a "concurrence" letter.

Key updates/additions to the original ORO letters include the following items discussed between SNC personnel and representatives of State and local ORO agencies/departments:

- The changes to the emergency operations facility (EOF) staffing, most notably the addition of a senior decision maker with the title of Emergency Director, who is vested with the command and control authority for approving notifications to OROs and for approval of licensee protective action recommendations (PARs) to OROs. The OROs noted the addition of this new leadership position will not alter the interface between the licensee and the States and counties, as described in the applicable State/local REP plans.
- SNC's proposed changes to their on-shift staffing and augmented response staffing positions, titles, and duties to align the SNC sites with a common emergency response organization (ERO) structure. These changes do not: (1) alter how the OROs would respond to a radiological emergency at any of the SNC sites; (2) necessitate a change to the current ORO REP plans, or (3) alter the existing points of interface with the licensee. The OROs acknowledged they understood that part of the staffing changes includes transitioning from three (3) licensee radiological field monitoring teams (FMTs) to two FMTs. Through continued coordination between the State and licensee radiological assessment organizations, an adequate field monitoring capability will be maintained.
- SNC's proposal changes the definition for ERO augmentation time at Plant Hatch, Plant Vogtle and the common EOF from 60 minutes from notification of an Alert or higher emergency, with 15 minutes to complete notification, to 75 minutes from declaration of an Alert or higher emergency. The OROs recognize this augmentation time is effectively the same time period (75 minutes total from time of event declaration) and aligns with the existing augmentation time for Plant Farley. As such, this change does not impact respective State/local REP plans.
- The OROs also recognize that minor administrative changes will need to be made to respective State/local REP plans to support the implementation of the proposed SNC SEP, due to changes in the title of the document. These changes will be submitted by States/locals, as appropriate, for FEMA approval in support of the final SNC SEP implementation.

SNC has updated their draft plans (SEP and respective site annexes) in response to the NRC staff's requests for additional information. Copies of the latest draft versions are publicly available in ADAMS under Accession No. ML16167A468 (package). Copies of these documents are also available through my lead technical reviewer, Richard Kinard.

In order to support our development of safety evaluation reports for each of the sites (Farley, Hatch and Vogtle), I'm requesting you provide the NRC the results of the FEMA review by no later than August 5, 2016.

V. Quinn

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Once again, thank you for your assistance. If you have any questions regarding the specifics of the changes requested by SNC, or the NRC's evaluation of these proposed changes, please contact Richard Kinard at (301) 287-3768.

Sincerely,

/RA/

Joseph D. Anderson, Chief
Reactor Licensing Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

Enclosure:

Letters of Concurrence

cc: A. Coons, FEMA HQ
M. Markley, NRR/DORL
S. Williams, NRR/DORL

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Distribution:

DPR R/F

ADAMS Accession No.: ML16176A150

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NAME:	RKinard	MNorris	JAnderson
DATE:	06/30/16	06/30/16	07/05/16

OFFICIAL RECORDS COPY

Letters of Concurrence

- State of Alabama Department of Public Health,
- State of Alabama Emergency Management Agency (EMA),
- Aiken County (SC) Department of Emergency Services,
- Allendale County (SC) EMA,
- Appling County (GA) EMA,
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- State of South Carolina Emergency Management Division,
- Savannah River Site (Department of Energy),
- Tatnall County (GA) EMA, and
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Enclosure