

## NRC EPFAQ – EPIP Submittal

### Preliminary Draft

#### Question

How is it determined when a revision of a sub-tier document (e.g., EPIP, large wall charts maintained in the control room) is subject to the 50.54(q)(3) process and requires submittal of a report of the change and summary of its analysis to the NRC in accordance with 50.54(q)(5)?

#### Answer

- Review the cross reference of program elements that implement the 10 CFR50.47(b) emergency planning standards and determine if it is up to date. If a section of a sub-tier document is listed in the cross reference as the only means to meet the programmatic method then that section of the sub-tier document is subject to the 50.54(q)(3) process.
- If the licensee has received a safety evaluation report (SER) and the SER references a specific section of a sub-tier document as a means to meet a programmatic method, then that specific section of the sub-tier document is part of the emergency plan and is subject to the 50.54(q)(3) process (e.g., Emergency Action Levels).
- If a sub-tier document is referenced in the body of the emergency plan, then sections of the sub-tier document may be part of the emergency plan. If a programmatic description has been relocated from the emergency plan to a sub-tier document, then the section of the sub-tier document that contains the programmatic description is subject to the 50.54(q)(3) process.\*
- The listing by title, of procedures required to implement the plan (usually in an appendix and including the section(s) of the plan to be implemented by each procedure) does not by itself cause the listed procedure to be part of the emergency plan.

\* Other parts of the sub-tier document that do not contain programmatic descriptions are not subject to the 50.54(q)(3) process. For example, sections of the sub-tier document that contain step-by-step instructions that document performance are not subject to the 50.54(q)(3) process. It is a good practice to identify where a relocated programmatic description appears in the body of the sub-tier document.