



Pre-Application Public Meeting for  
Proposed License Amendment Request  
to Revise the  
STPEGS Emergency Plan  
Staff Augmentation Times

September 20, 2016



# Introductions

- Mike Murray- Regulatory Affairs Manager
- Joe Enoch- Supervisor, Emergency Planning
- Stephanie Rodgers- Staff, Emergency Planning
- Kathleen Van Daalen- Staff, Licensing



# Desired Outcomes

- Communicate the content of the planned submittal
- Provide a common understanding of the planned submittal



# Proposed Changes

- Increases the STPEGS (STP) Emergency Plan staff augmentation times from 60 and 75 minutes to 90 minutes.
  - Increases the required augmentation time for Emergency Response Organization members to respond to their facility
  - Expands eligible pool of personnel to fill critical Emergency Response Organization positions, adding valuable technical expertise and defense in depth
  - Increases Emergency Response Facilities activation times
- The proposed changes considered the guidance of RIS 2016-10



# Regulatory Compliance

## **Applicable Regulatory Documents**

- 10 CFR 50.47(b)(2)
- 10 CFR 50.54(q)
- 10 CFR 50.90
- NUREG-0654
- NUREG-0737
- RG 1.219
- RG 1.101
- RIS 2016-10

## **Referenced in LAR Submittal**

- Planning Standard (ERO)
- Prior Approval (Example 1.219)
- License Request (required)
- Guidance (Basis for Plan)
- STA (Engineering On-shift)
- Guidance for Changes (50.54q)
- Endorsement (NUREG-0654)
- Expectation (Staff)



# Comparison (RIS-STP LAR)

## RIS 2016-10

- Current License Basis
- Fukushima (FLEX)
- NUREG-0654 Staffing
  - Major Functions
  - Technology
  - Table B-1, 60-90 Minute
- Offsite Agency Impact

## STP Submittal

- May 20, 1993
- No credit taken
- Staffing > NUREG-0654
  - Identified
  - Described
  - Defined
- State/County Concurrence



# Comparison (RIS-STP LAR)

## RIS 2016-10

## STP Submittal

### Major Functional Tasks

- Notification and Communication
- Emergency Director
- Off-site Surveys / On-site (out-of-plant) / In-Plant Surveys
- Chemistry/Radio-chemistry
- Technical Support
- Repair and Corrective Actions
- Radiation Protection
- Dose Assessment

### Details

- 2 Dedicated on-shift ( RO & NLO)
- 2 Augmented at 90-minutes
- Describes personnel and technology
- On-shift staffed
- STA role and technology
- Identified Staffing > NUREG-0654
- Staffing and technology
- On-shift staffed



# Site/Program Enhancements

- Technology
  - Access/Dosimetry Controls
  - Area Radiation Monitors
  - Dose Assessment
  - Plant Computer (System status trees)
  - Auto Notifications Systems
  - Web EOC
- Training
  - Licensed Operator Requalification and Simulator Modeling
  - Accredited Programs (Operations, RP, Chemistry, Maintenance, Engineering)
- Procedures
  - Symptom Based
  - Initiating Events (EALs NEI 99-01 Rev. 6)
- Shift Complement





# Staffing Changes

- Increased in 1993 to staffing of 20
- Currently staffed at 25
  - Will remain staffed at 25
- Operations Staff
  - 2-SMs (ED qualified)
  - 2-SROs
  - 4-ROs
  - 4-NLOs
  - 1-STA



# Staffing Comparison

Major Functional Area NUREG-0654	NUREG-0654 On- shift/30/60 minutes	Current STP Staffing On-shift/60/75 minutes	Proposed STP Staffing On-shift/90 minutes
<b>Operations *</b>			
1. Shift Sup/Manager	1. 1/0/0	1. 2/0/0	1. 2/0
2. Shift Foreman/US	2. 1/0/0	2. 2/0/0	2. 2/0
3. RO	3. 2/0/0	3. 4/0/0	3. 4/0
4. Plant Operators	4. 2/0/0	4. 4/0/0	4. 4/0
5. STA	5. 1**/0/0 (not counted in On-shift Total)	5. 1**/0/0 (not counted in On-shift Total)	5. 1**/0 (not counted in On-shift Total)
6. Operations Discipline Lead	6. None defined	6. 0/0/1#	6. 0/1#
<b>Emergency Direction and Control*** (STA, SS, or Facility Director)</b>	1**/0/0 (not counted in On-shift Total)	2**/0/0 (not counted in On-shift Total)	2**/0 (not counted in On-shift Total)
<b>Notification/ Communication</b>	1/1/2	2/0/2	2/2

\* Unaffected Unit in operation maintain shift foreman, 1-RO, 1-NLO

\*\* May be provided by shift personnel assigned other functions

\*\*\* Assumed by EOF Director when all facilities are manned

# Filled by personnel with plant operations experience



# Staffing Comparison (Continued)

Major Functional Area NUREG-0654	NUREG-0654 On- shift/30/60 minutes	Current STP Staffing On-shift/60/75 minutes	Proposed STP Staffing On-shift/90 minutes
<b>Radiological Assessment</b>			
Emergency Director	0/0/1	0/0/1	0/1
Senior HP Expertise	0/1/0	1/0/0	1/0
Offsite/Onsite surveys	0/3/3	2/3/4	2 <sup>**</sup> /7
Chemistry/Radio-chem	2/1/2	1/0/1	1/1
<b>Engineering, Repair and Corrective Actions</b>			
<b>1. Technical Support</b>	1.	1.	1.
STA	1/0/0	1/0/0	1/0
Core	0/1/0	0/1/0	0/1
Electrical	0/0/1	0/0/1	0/1
Mechanical	0/0/1	0/0/1	0/1
<b>2. Repair and Corr. Actions</b>	2.	2.	2.
Rad Waste/ Mechanical	1 <sup>**</sup> /0/2 (not counted in On-shift total)	2 <sup>**</sup> /0/0 (not counted in On-shift Total) 1 <sup>**</sup> /0/1	2 <sup>**</sup> /0 (not counted in On-shift Total) 1 <sup>**</sup> /1
Electrical/I&C	1 <sup>**</sup> /1/1 (not counted in On-shift Total)	1 <sup>**</sup> and 1/0/1	1 <sup>**</sup> and 1/1
I&C	0/1/0	1/0/0	1/0

**\*\*** May be provided by shift personnel assigned other functions



# Staffing Comparison (Continued)

Major Functional Area NUREG-0654	NUREG-0654 On- shift/30/60 minutes	Current STP Staffing On-shift/60/75 minutes	Proposed STP Staffing On-shift/90 minutes
<b>Protective Actions (In Plant) Radiation Protection HP Technicians for:</b>  a. Access Control b. HP Coverage c. Personnel monitor d. Dosimetry	2**/2/2 (not counted in On-shift Total)	2**/4/0 (not counted in On-shift Total)	2**/4 (not counted in On-shift Total)
<b>Firefighting</b>	Per T/S / Local Support / 0	Per T/S / Local Support / Local Support	Per T/S / Local Support
<b>Rescue First Aid</b>	2**/ Local Support (not counted in On-shift Total)	2**/ Local Support / Local Support	2**/ Local Support
<b>Security Site Access Control and Personnel Accountability</b>	Per Security Plan	Per Security Plan	Per Security Plan
<b>Totals</b>	10/11/15 = 36	25/8/13 = 46	25/21 = 46

\*\* May be provided by shift personnel assigned other functions



# Precedent

- Point Beach
- Prairie Island
- RAIs Reviewed



# Closing Remarks

- Desired Outcome
- Submittal Date
- STP Point of Contact