



# Pre-Submittal Call

**License Amendment Requests for  
Prairie Island and Monticello Emergency  
Action Level Scheme Changes**

**January 24, 2017**



# Agenda

- ◆ Pre-Submittal Call Purpose
- ◆ Current Licensing Basis
- ◆ Proposed Change
- ◆ LAR Content and Precedent
- ◆ Regulatory Requirements, Guidance, & EP FAQs
- ◆ LAR Schedule
- ◆ Conclusions



# Pre-Submittal Call Purpose

- ◆ Communicate EAL scheme change LAR plans for Prairie Island and Monticello
- ◆ Outline proposed LAR format and content
- ◆ Discuss:
  - Regulatory Criteria
  - Regulatory Guidance
  - Current NRC staff positions (EP FAQs)

# Current EAL Licensing Basis

- ◆ Prairie Island and Monticello Current EALs:
  - NEI 99-01, Rev 4, for non-security EALs
  - NEI 99-01, Rev 5, for security EALs

# Proposed EAL Changes

- ◆ Scheme change for both sites to adopt the NRC endorsed NEI 99-01, Rev 6 EALs
- ◆ Separate submittals for the sites
- ◆ Differences will be noted and explained
- ◆ Only deviations are approved based on EP FAQ responses (also noted and explained in the applications)

# LAR Content and Precedent

- ◆ Two LARs
- ◆ Cover Letter
- ◆ Enclosure – Content per NEI 06-02
  - Attachment 1 – Differences and Deviations
  - Attachment 2 – NEI 99-01 Rev 6 Mark-up Copy
  - Attachment 3 – NEI 99-01 Rev 6 Clean Copy
  - Attachment 4 – Supporting Calculations
  - Attachment 5 – Wall Board (Information Only)
- ◆ Precedent for NEI 99-01, Rev 6 LARs



# Regulatory Requirements

- ◆ 10 CFR 50.47(b)(4)
- ◆ 10 CFR 50, Appendix E, Section IV.B.1
- ◆ 10 CFR 50, Appendix E, Section IV.B.2
- ◆ 10 CFR 50.90, 50.91 and 50.92

# Regulatory Guidance

- ◆ RG 1.219, Revision 1, “Guidance On Making Changes to Emergency Plans for Nuclear Power Plants”
- ◆ NUREG-0654, Revision 1, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants”
- ◆ NEI 99-01, Revision 6, “Development of Emergency Action Levels for Non-Passive Reactors”
- ◆ NRC letter to NEI, “US Nuclear Regulatory Commission Review and Endorsement of NEI 99-01, Revision 6, dated November, 2012”
- ◆ RIS 2003-18, “Use of NEI 99-01, “Methodology for Development of Emergency Action Levels,” and its supplements
- ◆ NEI 06-02, “License Amendment Request (LAR) Guidelines”



## Current EP FAQs

- ◆ LAR incorporates EP FAQs:
  - 2015-003, 2015-004, 2015-005, and 2015-006 (MNGP)
  - 2015-008, 2015-014, and 2015-015 (MNGP & PINGP)
- LAR does not incorporate EP FAQ 2015-013
  - EP FAQ reviewed but no changes at either site



## LAR Schedule

- ◆ Both Prairie Island and Monticello:
  - Plan to submit separate applications by the end of the first quarter/beginning of second quarter 2017
  - Request a one year review
  - Propose a 180 day implementation period for both facilities

# Conclusions

- ◆ Proposed EAL scheme changes:
  - Based on NRC endorsed NEI 99-01, Rev 6
  - Provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency
  - Continue to minimize impact of radiological emergencies and provide protection of public health and safety
- ◆ Revised Emergency Plans continue to meet:
  - Planning standards of 10 CFR 50.47(b)
  - 10 CFR 50, Appendix E, Section IV.B



## Acronyms

CFR	Code of Federal Regulations
EAL	Emergency Action Level
EP	Emergency Preparedness
FAQ	Frequently Asked Questions
LAR	License Amendment Request
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
NUREG	NRC technical report designation
RG	Regulatory Guide
RIS	Regulatory Issue Summary