



License Amendment Requests for Change in Emergency Plan Staff Augmentation Response Times

**Pre-Submittal Meeting for:
Prairie Island Nuclear Generating Plant
*Monticello Nuclear Generating Plant***

February 7, 2017





Participants

Brian Carberry – PINGP EP Manager

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John Fields – Projects Licensing Engineer

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Agenda

- ◆ Pre-Submittal Meeting Purpose
- ◆ Emergency Plan Licensing Basis
- ◆ Proposed Emergency Plan Changes
- ◆ LAR Format
- ◆ LAR Schedule
- ◆ Conclusions
- ◆ Questions?



Pre-Submittal Meeting Purpose

- ◆ Outline proposed Emergency Plan changes
- ◆ Discuss LAR Development / Content
- ◆ Review application of Industry Operating Experience for similar Licensing Amendment Requests

Emergency Plan Licensing Basis

- ◆ PINGP – E-Plan Status
 - Last NRC Approved Plan - Revision 2, approved 12/27/1982
 - Current Emergency Plan is Revision 52
- ◆ MNGP – E-Plan Status
 - Last NRC Approved Plan - Revision 2, approved 1/20/1983
 - Current Emergency Plan is Revision 47
- ◆ The LAR includes an analysis of NUREG-0654 Table B-1 functions as implemented in the Emergency Plan between the last approved and current revisions.



Proposed Emergency Plan Changes

- ◆ Proposes an increase in augmentation staff response times from 30 and 60 minutes to 60 and 90 minutes
- ◆ Define facility activation criteria for TSC, OSC and EOF
- ◆ Removal of RP support coming from opposite site in a specified time frame
- ◆ Removal of Electrical Maintenance Responder and Radwaste Operator (PINGP only)
- ◆ Removal of post-accident in-plant surveys by licensed operators (PINGP only)

Reason for Proposed Changes

- ◆ Increases in ERO augmented positions since 1982/1983 requires commensurate increase in the number of individuals required to meet Emergency Plan requirements
 - PINGP E-Plan staffing levels
 - Rev. 2 plan consisted of 52 augmented responders
 - Current plan increases augmented responders by 200%
 - MNGP E-Plan staffing levels
 - Rev. 2 plan consisted of 87 augmented responders
 - Current plan increases augmented responders by 66%

LAR Format

- ◆ LAR follows NEI 06-02, “License Amendment Request (LAR) Guidelines”
- ◆ Enclosures/Attachments include:
 - Technical Justification based on improvements in plant systems, procedures, dose assessment and training
 - Functional analysis of Table B-1 Major Tasks
 - Marked Up Copy of Affected Plan pages
 - Clean Copy of Affected Plan pages
 - Table B-1 Comparative Chart
 - Letters of Offsite Response Organization Concurrence

Regulatory Guidance

- ◆ RG 1.219, “Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors”
- ◆ NUREG-0654/FEMA-REP-1, Rev. 1, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants”
- ◆ NSIR/DPR-ISG-01, “Interim Staff Guidance Emergency Planning for Nuclear Power Plants”
- ◆ RIS 2016-10, “License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation”
- ◆ NEI 10-05, “Assessment of On-Shift Emergency Response Organization Staffing and Capabilities”

Industry Operating Experience

- ◆ Proposed changes to MNGP and PINGP E-Plans similar to changes approved by NRC for other licensees:
 - Susquehanna
 - Fermi
 - River Bend
 - Watts Bar
 - Point Beach
 - Duane Arnold Energy Center (accepted for review only)



LAR Schedule

- ◆ Submittal of both LARs by 3/31/2017
- ◆ Request approval by 4/30/2018
- ◆ Propose a 180 day implementation period



Conclusions

- ◆ Proposed staffing continues to minimize impact of radiological emergencies and provide protection of public health and safety
- ◆ Supported by Technical Justification and Functional Analysis
- ◆ Revised Emergency Plan continues to meet §50.54(q)(2), §50 Appendix E, and the planning standards of §50.47(b)



Questions?

Acronyms

E-Plan – Emergency Plan

EOF – Emergency Operations Facility

EP – Emergency Planning/Preparedness

ERO – Emergency Response Organization

LAR – License Amendment Request

MNGP – Monticello Nuclear Generating Plant

NEI – Nuclear Energy Institute

NRC – Nuclear Regulatory Commission

NSIR – Office of Nuclear Safety and Incident Response

OSC – Operational Support Center

PINGP – Prairie Island Nuclear Generating Plant

RG – Regulatory Guide

RIS – Regulatory Information Summary

RP – Radiation Protection

TSC – Technical Support Center