



Duke Energy

ACTION REQUEST - 02109914

Action Request Cross References

Ref	Ref	Ref	Ref Nbr	Status	Limit	Description
Type	Nbr	Sub	Type		AR Cls	
AR	02059527		NCR	COMPLETE	N	Evaluate TSC use during outages

Action Request Assignment Details

ASSIGNMENT NUMBER : 01 SUB :

Type	: EP01	Due Date	: 03/30/2017	Pri Resp Fac	:
Status	: COMPLETE	Reschedule	:	Pri Resp Group	:
Assigned To	: STACI N FISCHER			Sec Resp Fac	:
Subject	: 50.54(Q) SCREEN			Sec Resp Group	:

Aff Facility	: CN	Unit	:	System	:
UCR	:	Schedule Ref	:		
Organization	:	Department	: 13650	Discipline	:
Est Manhrs	:	Ext Comp Date	:		

Description

COMPLETE 50.54(Q) SCREEN IN ACCORDANCE WITH AD-EP-ALL-0602.

Action Request Assignment Completion Notes

Action Request Assignment Status History

Updated Date	Updated By	Assgn Status	Assgn Due Date
03/21/2017	I44004	INPROG	
03/21/2017	I44004		03/30/2017
03/21/2017	I44004	ACC/ASG	
03/28/2017	I44004	AWAIT/C	
03/29/2017	TAA7322	COMPLETE	



Duke Energy

ACTION REQUEST - 02109914

Action Request Assignment Attributes

Action Request Assignment Routing/Return Comments

Routing Comments from the X601 Panel

*** No Routing Comments Found ***

Updated On

Updated By

Routing Comments from the X602 Panel

*** No Return Comments Found ***

Updated On

Updated By

Action Request Assignment Completion Approval

Route List : 001

Route List Initiator : I44004

<u>Passport</u>	<u>Fac</u>	<u>Group</u>	<u>/</u>	<u>Type</u>	<u>Send</u> <u>Date</u>	<u>Send</u> <u>Time</u>	<u>Action</u> <u>Taken</u>	<u>Action</u> <u>Date</u>	<u>/</u>	<u>Time</u>	<u>Last Name</u>
I80034				A	03/28/2017	15:52	APPROVED	03/28/2017		17:36	WHITE
TAA7322				A	03/28/2017	17:36	APPROVED	03/29/2017		13:51	ARLOW

Action Request Assignment Cause/Action

Action Request Assignment Reference Documents

<u>Facility</u>	<u>Doc</u> <u>Type</u>	<u>Sub</u> <u>Type</u>	<u>Document</u>	<u>Sheet</u>	<u>Rev</u>	<u>Minor</u> <u>Rev</u>	<u>Title</u>
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Action Request Assignment Reference Equipment

<u>Facility</u>	<u>Unit</u>	<u>System</u>	<u>Equip</u> <u>Type</u>	<u>Equip</u> <u>Number</u>	<u>Equip</u> <u>Tag</u>	<u>Equip</u> <u>Status</u>	<u>Rev</u> <u>Rev</u>	<u>Rev</u> <u>Status</u>
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<< 10 CFR 50.54(q) Screening Evaluation Form >>

Screening and Evaluation Number		Applicable Sites				
EREG #: _____ 2066407 _____		BNP			<input type="checkbox"/>	
		CNS			<input checked="" type="checkbox"/>	
		CR3			<input type="checkbox"/>	
		HNP			<input type="checkbox"/>	
5AD #: _____ N/A _____		MNS			<input type="checkbox"/>	
		ONS			<input type="checkbox"/>	
		RNP			<input type="checkbox"/>	
		GO			<input type="checkbox"/>	
Document and Revision		No Document Revision				
<p>Part I. Description of Activity Being Reviewed (event or action, or series of actions that may result in a change to the emergency plan or affect the implementation of the emergency plan):</p> <p>During outages, the Radiation Protection organization is proposing to locate the RCA entry point briefing areas for Lower Containment and the Auxiliary Building in the Evacuation Coordinators area of the TSC. In the event the TSC is activated, the RP staff will collect their materials and leave the TSC within 75 minutes of the emergency declaration.</p> <p>No minimum staffing Emergency Response Organization (ERO) members will be affected by the briefing area being located in the Evacuation Coordinators Area. The Evacuation Coordinators Area is simply tables and chairs; no computers or procedures are kept in this area. The TSC ERO minimum staffing work areas, procedures, computers and telephones are not affected by this proposed change.</p> <p>One other temporary change that the RP Organization proposes is to move the RCA Access Stations (Electronic Dosimeter Log-in/Log-out stations) within the TSC from the TSC Evacuation Coordinators Area to the TSC Engineering Area. With this move, the ERO will maintain the capability to obtain an electronic dosimeter from the RCA Access Stations while remaining in the TSC ventilation envelope. The ERO will be made aware of this temporary change.</p>						
Part II. Activity Previously Reviewed? Is this activity Fully bounded by an NRC approved 10 CFR 50.90 submittal or Alert and Notification System Design Report? If yes, identify bounding source document number or approval reference and ensure the basis for concluding the source document fully bounds the proposed change is documented below: Justification:		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	10 CFR 50.54(q) Effectiveness Evaluation is not required. Enter justification below and complete Attachment 4, Part V.			Continue to Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part III
Bounding document attached (optional)		<input type="checkbox"/>				

Part III. Editorial Change		Yes	<input type="checkbox"/>	No	●
Is this activity an editorial or typographical change only, such as formatting, paragraph numbering, spelling, or punctuation that does not change intent?		10 CFR 50.54(q) Effectiveness Evaluation is not required. Enter justification and complete Attachment 4, Part V & VI.		Continue to Attachment 4, Part IV and address non editorial changes	
Justification:					
Part IV. Emergency Planning Element and Function Screen (Reference Attachment 1, Considerations for Addressing Screening Criteria)					
Does this activity involve any of the following, including program elements from NUREG-0654/FEMA REP-1 Section II? If answer is yes, then check box.					
1	10 CFR 50.47(b)(1) Assignment of Responsibility (Organization Control)				
1a	Responsibility for emergency response is assigned.				<input type="checkbox"/>
1b	The response organization has the staff to respond and to augment staff on a continuing basis (24-7 staffing) in accordance with the emergency plan.				<input type="checkbox"/>
2	10 CFR 50.47(b)(2) Onsite Emergency Organization				
2a	Process ensures that onshift emergency response responsibilities are staffed and assigned				<input type="checkbox"/>
2b	The process for timely augmentation of onshift staff is established and maintained.				●
3	10 CFR 50.47(b)(3) Emergency Response Support and Resources				
3a	Arrangements for requesting and using off site assistance have been made.				<input type="checkbox"/>
3b	State and local staff can be accommodated at the EOF in accordance with the emergency plan. (NA for CR3)				<input type="checkbox"/>
4	10 CFR 50.47(b)(4) Emergency Classification System				
4a	A standard scheme of emergency classification and action levels is in use. (Requires final approval of Screen and Evaluation by EP CFAM.)				<input type="checkbox"/>
5	10 CFR 50.47(b)(5) Notification Methods and Procedures				
5a	Procedures for notification of State and local governmental agencies are capable of initiating notification of the declared emergency within 15 minutes (60 minutes for CR3) after declaration of an emergency and providing follow-up notification.				<input type="checkbox"/>
5b	Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway. (NA for CR3)				<input type="checkbox"/>
5c	The public ANS meets the design requirements of FEMA-REP-10, Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants, or complies with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter. (NA for CR3)				<input type="checkbox"/>

Part IV. Emergency Planning Element and Function Screen (cont.)		
6	10 CFR 50.47(b)(6) Emergency Communications	
6a	Systems are established for prompt communication among principal emergency response organizations.	<input type="checkbox"/>
6b	Systems are established for prompt communication to emergency response personnel.	<input type="checkbox"/>
7	10 CFR 50.47(b)(7) Public Education and Information	
7a	Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway emergency planning zone (EPZ). (NA for CR3)	<input type="checkbox"/>
7b	Coordinated dissemination of public information during emergencies is established.	<input type="checkbox"/>
8	10 CFR 50.47(b)(8) Emergency Facilities and Equipment	
8a	Adequate facilities are maintained to support emergency response.	<input checked="" type="checkbox"/>
8b	Adequate equipment is maintained to support emergency response.	<input checked="" type="checkbox"/>
9	10 CFR 50.47(b)(9) Accident Assessment	
9a	Methods, systems, and equipment for assessment of radioactive releases are in use.	<input type="checkbox"/>
10	10 CFR 50.47(b)(10) Protective Response	
10a	A range of public PARs is available for implementation during emergencies. (NA for CR3)	<input type="checkbox"/>
10b	Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities. (NA for CR3)	<input type="checkbox"/>
10c	A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.	<input type="checkbox"/>
10d	KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public.	<input type="checkbox"/>
11	10 CFR 50.47(b)(11) Radiological Exposure Control	
11a	The resources for controlling radiological exposures for emergency workers are established.	<input type="checkbox"/>
12	10 CFR 50.47(b)(12) Medical and Public Health Support	
12a	Arrangements are made for medical services for contaminated, injured individuals.	<input type="checkbox"/>
13	10 CFR 50.47(b)(13) Recovery Planning and Post-accident Operations	
13a	Plans for recovery and reentry are developed.	<input type="checkbox"/>
14	10 CFR 50.47(b)(14) Drills and Exercises	
14a	A drill and exercise program (including radiological, medical, health physics and other program areas) is established.	<input type="checkbox"/>
14b	Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills are assessed via a formal critique process in order to identify weaknesses.	<input type="checkbox"/>
14c	Identified weaknesses are corrected.	<input type="checkbox"/>
15	10 CFR 50.47(b)(15) Emergency Response Training	
15a	Training is provided to emergency responders.	<input type="checkbox"/>
Part IV. Emergency Planning Element and Function Screen (cont.)		
16	10 CFR 50.47(b)(16) Emergency Plan Maintenance	
16a	Responsibility for emergency plan development and review is established.	<input type="checkbox"/>

16b	Planners responsible for emergency plan development and maintenance are properly trained.	<input type="checkbox"/>	
PART IV. Conclusion If no Part IV criteria are checked, a 10 CFR 50.54(q) Effectiveness Evaluation is not required, then complete Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part V. Go to Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part VI for instructions describing the NRC required 30 day submittal.			<input type="checkbox"/>
If any Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part IV criteria are checked, then complete Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part V and perform a 10 CFR 50.54(q) Effectiveness Evaluation. Shaded block requires final approval of Screen and Evaluation by EP CFAM.			•

Part V. Signatures:		
Preparer Name (Print): Staci Fischer	Preparer Signature: See CAS	Date: See CAS
Reviewer Name (Print): Jeffery White	Reviewer Signature: See CAS	Date: See CAS
Approver (EP Manager Name (Print): Tom Arlow	Approver Signature: See CAS	Date: See CAS
Approver (CFAM, as required) Name (Print) N/A	Approver Signature: N/A	Date: N/A

Part VI. NRC Emergency Plan and Implementing Procedure Submittal Actions	
Create two EREG General Assignments. <ul style="list-style-type: none"> One for EP to provide the 10 CFR 50.54(q) summary of the analysis, or the completed 10 CFR 50.54(q), to Licensing. One for Licensing to submit the 10 CFR 50.54(q) information to the NRC within 30 days after the change is put in effect. 	• •

QA RECORD



Duke Energy

ACTION REQUEST - 02109914

Action Request Assignment Details

ASSIGNMENT NUMBER : 02 SUB :

Type	: EP02	Due Date	: 03/30/2017	Pri Resp Fac	:
Status	: COMPLETE	Reschedule	:	Pri Resp Group	:
Assigned To	: STACI N FISCHER			Sec Resp Fac	:
Subject	: 50.54(Q) EVALUATION			Sec Resp Group	:
Aff Facility	: CN	Unit	:	System	:
UCR	:	Schedule Ref	:		
Organization	:	Department	: 13650	Discipline	:
Est Manhrs	:	Ext Comp Date	:		

Description

COMPLETE 50.54(Q) EVALUATION IN ACCORDANCE WITH AD-EP-ALL- 0602.

Action Request Assignment Completion Notes

Action Request Assignment Status History

<u>Updated Date</u>	<u>Updated By</u>	<u>Assgn Status</u>	<u>Assgn Due Date</u>
03/21/2017	I44004	INPROG	
03/21/2017	I44004		03/30/2017
03/21/2017	I44004	ACC/ASG	
03/28/2017	I44004	AWAIT/C	
03/29/2017	TAA7322	COMPLETE	

Action Request Assignment Attributes

Action Request Assignment Routing/Return Comments

Routing Comments from the X601 Panel

*** No Routing Comments Found ***

Updated On

Updated By



Duke Energy

ACTION REQUEST - 02109914

Routing Comments from the X602 Panel

*** No Return Comments Found ***

Updated On

Updated By

Action Request Assignment Completion Approval

Route List : 001

Route List Initiator : 144004

<u>Passport</u>	<u>Fac</u>	<u>Group</u>	<u>/</u>	<u>Type</u>	<u>Send</u> <u>Date</u>	<u>Send</u> <u>Time</u>	<u>Action</u> <u>Taken</u>	<u>Action</u> <u>Date</u>	<u>/</u>	<u>Time</u>	<u>Last Name</u>
I80034				A	03/28/2017	15:52	APPROVED	03/28/2017	17:39		WHITE
TAA7322				A	03/28/2017	17:39	APPROVED	03/29/2017	13:50		ARLOW

Action Request Assignment Cause/Action

Action Request Assignment Reference Documents

<u>Facility</u>	<u>Doc</u> <u>Type</u>	<u>Sub</u> <u>Type</u>	<u>Document</u>	<u>Sheet</u>	<u>Rev</u>	<u>Minor</u> <u>Rev</u>	<u>Title</u>
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Action Request Assignment Reference Equipment

<u>Facility</u>	<u>Unit</u>	<u>System</u>	<u>Equip</u> <u>Type</u>	<u>Equip</u> <u>Number</u>	<u>Equip</u> <u>Tag</u>	<u>Equip</u> <u>Status</u>	<u>Rev</u> <u>Status</u>
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Action Request Assignment Cross References

<u>Ref</u> <u>Type</u>	<u>Ref</u> <u>Nbr</u>	<u>Ref</u> <u>Sub</u>	<u>Ref Nbr</u> <u>Type</u>	<u>Status</u>	<u>Limit</u> <u>AS Cls</u>	<u>Description</u>
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Action Request Assignment Appendices

APPENDIX 1

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 1

ATTACHMENT 5
Page 1 Syntax Error, 1 of 8

<< 10 CFR 50.54(q) Effectiveness Evaluation Form >>

Screening and Evaluation Number		Applicable Sites	
EREG #: 2066407		BNP	<input type="checkbox"/>
		CNS	<input checked="" type="checkbox"/>
		CR3	<input type="checkbox"/>
		HNP	<input type="checkbox"/>
5AD #: N/A		MNS	<input type="checkbox"/>
		ONS	<input type="checkbox"/>
		RNP	<input type="checkbox"/>
		GO	<input type="checkbox"/>
Document and Revision	No Document Revision		
<p>Part I. Description of Proposed Change:</p> <p>During outages, the Radiation Protection organization is proposing to locate the RCA entry point briefing areas for Lower Containment and the Auxiliary Building in the Evacuation Coordinators area of the TSC. In the event the TSC is activated, the RP staff will collect their materials and leave the TSC within 75 minutes of the emergency declaration.</p> <p>No minimum staffing Emergency Response Organization (ERO) members will be affected by the briefing area being located in the Evacuation Coordinators Area. The Evacuation Coordinators Area is simply tables and chairs; no computers or procedures are kept in this area. The TSC ERO minimum staffing work areas, procedures, computers and telephones are not affected by this proposed change.</p> <p>One other temporary change that the RP Organization proposes is to move the RCA Access Stations (Electronic Dosimeter Log-in/Log-out stations) within the TSC from the TSC Evacuation Coordinators Area to the TSC Engineering Area. With this move, the ERO will maintain the capability to obtain an electronic dosimeter from the RCA Access Stations while remaining in the TSC ventilation envelope. The ERO will be made aware of this temporary change.</p>			
Attachment 6, 10 CFR 50.54(q) Initiating Condition (IC) and Emergency Action Level (EAL) and EAL Bases Validation and Verification (V&V) Form , is attached (required for IC or EAL change)			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

<< 10 CFR 50.54(q) Effectiveness Evaluation Form >>

Part II. Description and Review of Licensing Basis Affected by the Proposed Change:

Three licensing basis documents were reviewed for applicability, 1) the Catawba Emergency plan, Revision 2, as the original plan approved by the NRC, 2) the current Catawba Emergency plan, revision 148, and 3) Duke Power Company Response to Supplement 1 to NUREG-0737, Emergency Response Capability for Catawba Nuclear Station, Volume 1.

Catawba Emergency Plan, Rev 2

EPA Section B, Site Emergency Organization

Figure B-1 contains the minimum staff required to activate the TSC, listing the capability for Additions at 45 minutes and 75 minutes.

EPA Section H, Emergency Facilities and Equipment

Section H.1.b, Technical Support Center

Section H.5.b:

"Radiological monitors including process monitors, area monitors, post-accident monitoring equipment, effluent monitors, **personnel monitoring devices**, portable monitors and sampling equipment are described in various Radiation Protection procedures, the Catawba UFSAR, Emergency Plan Implementing Procedures and Safety Evaluation Report."

The Catawba Emergency Plan, rev 2, does not refer to non-emergency use of the TSC.

Catawba Emergency Plan, Rev 148

EPA Section B, Site Emergency Organization

Figure B-1b contains the minimum staff required to activate the TSC, listing the capability for Additions at 45 minutes and 75 minutes.

EPA Section H, Emergency Facilities and Equipment

Section H.1.b, Technical Support Center

Section H.5.b:

"Radiological monitors including process monitors, area monitors, post-accident monitoring equipment, effluent monitors, **personnel monitoring devices**, portable monitors and sampling equipment are described in various Radiation Protection procedures, the Catawba UFSAR, Emergency Plan Implementing Procedures and Safety Evaluation Report."

The Catawba Emergency Plan, rev 148, does not refer to non-emergency use of the TSC.

Duke Power Company Response to Supplement 1 to NUREG-0737, Emergency Response Capability for Catawba Nuclear Station, Volume 1.

7.1 Technical Support Center

Duke Power Company has established a Technical Support Center for Catawba Nuclear Station as identified, located and described in the Catawba Emergency Plan. The TSC is on the same elevation and within two minutes walking distance from the Control room. The TSC has the following capabilities and characteristics: *[none of the capabilities or characteristics mention non-emergency use of the TSC or personnel monitoring devices/dosimetry]*

<< 10 CFR 50.54(q) Effectiveness Evaluation Form >>

Part III. Description of How the Proposed Change Complies with Regulation and Commitments.

If the emergency plan, modified as proposed, no longer complies with planning standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50, then ensure the change is rejected, modified, or processed as an exemption request under 10 CFR 50.12, Specific Exemptions, rather than under 10 CFR 50.54(q):

10 CFR 50.47(b) (2) Onsite Emergency Organization

"...facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified."

10 CFR 50.47(b) (8)

"Adequate emergency facilities and equipment to support the emergency response are provided and maintained."

Conclusion

The proposed change to use the TSC for an RP briefing area during outages continues to comply with Regulations and Commitments because the capability of the Emergency Response Organization to activate the TSC within 75 minutes is maintained.

The proposed change to move RCA Access Stations within the TSC maintains the capability of ERO members to obtain an electronic dosimeter, a personnel monitoring device.

Part IV. Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change (Address each function identified in Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part IV of associated Screen):

PLANNING STANDARDS

10 CFR 50.47(b) (2) Onsite Emergency Organization

The regulation at 10 CFR 50.47 (b) (2) states the following:

"...facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support

10 CFR 50.47(b)(8)—Emergency Facilities and Equipment

The regulation at 10 CFR 50.47 (b) (8) states the following:

"Adequate emergency facilities and equipment to support the emergency response are provided and maintained."

<< 10 CFR 50.54(q) Effectiveness Evaluation Form >>

FUNCTIONS

Two emergency planning functions have been defined for 10 CFR 50.47 (b) (2):

- (1) *The process ensures that onshift emergency response responsibilities are staffed and assigned. [Not applicable to this change]*
- (2) **The process for timely augmentation of onshift staff is established and maintained.**

Two emergency planning functions have been defined for 10 CFR 50.47 (b) (8):

- (1) **Adequate facilities are maintained to support emergency response.**
- (2) **Adequate equipment is maintained to support emergency response.**

ELEMENTS

Section IV.A of Appendix E to 10 CFR Part 50

A. Organization

The organization for coping with radiological emergencies shall be described, including definition of authorities, responsibilities, and duties of individuals assigned to the licensee's emergency organization and the means for notification of such individuals in the event of an emergency. Specifically, the following shall be included:

1. A description of the normal plant operating organization.
2. A description of the onsite emergency response organization (ERO) with a detailed discussion of:
 - a. Authorities, responsibilities, and duties of the individual(s) who will take charge during an emergency;
 - b. Plant staff emergency assignments;
 - c. Authorities, responsibilities, and duties of an onsite emergency coordinator who shall be in charge of the exchange of information with offsite authorities responsible for coordinating and implementing offsite emergency measures.
3. A description, by position and function to be performed, of the licensee's headquarters personnel who will be sent to the plant site to augment the onsite emergency organization.

Section IV.C of Appendix E to 10 CFR Part 50

C. Activation of Emergency Organization

1. The entire spectrum of emergency conditions that involve the alerting or activating of progressively larger segments of the total emergency organization shall be described. The communication steps to be taken to alert or activate emergency personnel under each class of emergency shall be described. Emergency action levels (based not only on onsite and offsite radiation monitoring information but also on readings from a number of sensors that indicate a potential emergency, such as the pressure in containment and the response of the Emergency Core Cooling System) for notification of offsite agencies shall be described. The existence, but not the details, of a message authentication scheme shall be noted for such agencies. The emergency classes defined shall include: (1) Notification of unusual events, (2) alert, (3) site area emergency, and (4) general emergency. These classes are further discussed in NUREG- 0654/FEMA-REP-1.

Section IV.E.1-4 of 10 CFR Part 50, Appendix E

E. Emergency Facilities and Equipment

Adequate provisions shall be made and described for emergency facilities and equipment, including:

1. Equipment at the site for personnel monitoring;
2. Equipment for determining the magnitude of and for continuously assessing the impact of the release of

<< 10 CFR 50.54(q) Effectiveness Evaluation Form >>

radioactive materials to the environment;
3. Facilities and supplies at the site for decontamination of onsite individuals;
4. Facilities and medical supplies at the site for appropriate emergency first aid treatment;
Section IV.E.8 of 10 CFR Part 50, Appendix E
8.a.

(i) A licensee onsite **technical support center** and an emergency operations facility from which effective direction can be given and effective control can be exercised during an emergency;

Section II.B of NUREG-0654

Planning Standard

On shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and the interfaces among various onsite response activities and offsite support and response activities are specified.

Applicable Evaluation Criteria

5. Each licensee shall specify the positions or title and major tasks to be performed by the persons to be assigned to the functional areas of emergency activity. For emergency situations, specific assignments shall be made for all shifts and for plant staff members, both onsite and away from the site. These assignments shall cover the emergency functions in Table B-1 entitled, "Minimum Staffing Requirements for Nuclear Power Plant Emergencies." The minimum on-shift staffing levels shall be as indicated in Table B-1. **The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency.** This capability shall be as indicated in Table B-1. The implementation schedule for licensed operators, auxiliary operators and the shift technical advisor on shift shall be as specified in the July 31, 1980 letter to all power reactor licensees. Any deficiencies in the other staffing requirements of Table B-1 must be capable of augmentation within 30 minutes by September 1, 1981, and such deficiencies must be fully removed by July 1, 1982.

NUREG-0654, Section II. H

Planning Standard

Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

Applicable Evaluation Criteria

1. Each licensee shall establish a Technical Support Center and an onsite operations support center (assembly area) in accordance with NUREG-0696, Revision 1.
4. Each organization shall provide for timely activation and staffing of the facilities and centers described in the plan.
11. Each plan shall, in an appendix, include identification of emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment and emergency supplies).

<< 10 CFR 50.54(q) Effectiveness Evaluation Form >>

NUREG-0696

Section 2, Technical Support Center

The onsite technical support center (TSC) will provide the following functions:

- Provide plant management and technical support to plant operations personnel during emergency conditions.
- Relieve the reactor operators of peripheral duties and communications not directly related to reactor system manipulations.
- Prevent congestion in the control room.
- Perform EOF functions for the Alert Emergency class and for the Site Area Emergency class and General Emergency class until the EOF is functional.

... The TSC facilities may be used by designated operating personnel for **normal daily operations** as well as for training and emergency drills. **Use of the TSC facility during normal operation shall be limited to activities that will not degrade TSC preparedness to react to abnormal conditions or reduce TSC systems reliability.**

Part V. Description of Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions:

The proposed change to use the TSC for an RP briefing area during outages maintains the effectiveness of the Emergency Plan Functions because the capability for timely augmentation of onshift staff is maintained. The RPs using this area can remove their work materials and allow for activation of the TSC within 75 minutes. The TSC Minimum Staffing work areas are not affected by this change; an adequate TSC facility is maintained to support emergency response.

The proposed change to move the RCA Access Stations within the TSC maintains the capability for timely augmentation of onshift staff and adequate equipment to support emergency response. The ERO members maintain the capability to obtain an electronic dosimeter within the TSC ventilation envelope.

Part VI. Evaluation Conclusion.

Answer the following questions about the proposed change.

1	Does the proposed change comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E?	Yes ●	No □
2	Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)?	Yes ●	No □
3	Does the proposed change maintain the current Emergency Action Level (EAL) scheme?	Yes ●	No □
4	Choose one of the following conclusions:		

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 1

ATTACHMENT 5

<< 10 CFR 50.54(q) Effectiveness Evaluation Form >>

a	The activity does continue to comply with the requirements of 10 CFR 50.47(b) and 10 CFR 50, Appendix E, and the activity does not constitute a reduction in effectiveness or change in the current Emergency Action Level (EAL) scheme. Therefore, the activity can be implemented without prior NRC approval.	●
b	The activity does not continue to comply with the requirements of 10 CFR 50.47(b) or 10 CFR 50 Appendix E or the activity does constitute a reduction in effectiveness or EAL scheme change. Therefore, the activity cannot be implemented without prior NRC approval.	□
Part VII. Disposition of Proposed Change Requiring Prior NRC Approval		
Will the proposed change determined to require prior NRC approval be either revised or rejected?		Yes <input type="checkbox"/> No <input type="checkbox"/>
If No, then initiate a License Amendment Request in accordance 10 CFR 50.90 and AD-LS-ALL-0002, Regulatory Correspondence, and include the tracking number: _____.		

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
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Part VIII. Signatures: EP CFAM Final Approval is required for changes affecting risk significant planning standard 10 CFR 50.47(b)(4).		
Preparer Name (Print): Staci Fischer	Preparer Signature: See CAS	Date: See CAS
Reviewer Name (Print): Jeffery White	Reviewer Signature: See CAS	Date: See CAS
Approver (EP Manager Name (Print): Tom Arlow	Approver Signature: See CAS	Date: See CAS
Approver (CFAM, as required) Name (Print) N/A	Approver Signature: N/A	Date: N/A
If the proposed activity is a change to the E-Plan or implementing procedures, then create two EREG General Assignments. <ul style="list-style-type: none"> One for EP to provide the 10 CFR 50.54(q) summary of the analysis, or the completed 10 CFR 50.54(q), to Licensing. One for Licensing to submit the 10 CFR 50.54(q) information to the NRC within 30 days after the change is put in effect. 		<input type="checkbox"/> <input type="checkbox"/>

QA RECORD