

**Attachment 1**

Letter Number 2.17.031  
Revised 10 CFR 50.54(q) Review for the PNPS Emergency Plan, EP-PP-01,  
Revision 47

Procedure/Document Number: EP-PP-01	Revision: 47
Equipment/Facility/Other: Pilgrim Nuclear Power Station	
Title: PNPS Emergency Plan	

**Part I. Description of Activity Being Reviewed** (This is generally changes to the emergency plan, EALs, EAL bases, etc. – refer to step 3.0[6]):

1. Delete Security Radio indication "2" from TSC to AEOF communication in Table F-1. Page F-6
2. Change Item 3 from "Reserved" to "(Spare)" in table F-1. Page F-6
3. Remove all references to the RACES Radio (440 MHz). Pages F-6, F-7
4. Moved the Plymouth Fire and Police Radios from the Telephones Section to the Radios Section in Table F-2. Page F-6
5. Change news media telephones are "installed" to "available". Page G-1
6. Change "teletype" to "teletypewriter". Page H-3
7. Change "Eating, drinking and smoking" to "Eating and drinking". Page K-3
8. Delete references to and tables O-1a and O-1b. O-2, O-6
9. Clarify that detailed training matrices are located in NTM5.5, Emergency Response Organization Training; and EN-TQ-110-01, Fleet EPlan Training Course Summary. Page O-2

**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/approval reference and ensure the basis for concluding the source document fully bounds the proposed change is documented below:

Justification:

Bounding document attached (optional)

YES  
50.54(q)(3)  
Evaluation is  
NOT required.  
Enter  
justification  
below and  
complete Part  
VI.

NO  
Continue to  
next part

**Part III. Applicability of Other Regulatory Change Control Processes**

Check if any other regulatory change processes control the proposed activity. (Refer to EN-LI-100)

**APPLICABILITY CONCLUSION**

- If there are no other controlling change processes, continue the 50.54(q)(3) Screening.
- One or more controlling change processes are selected, however, some portion of the activity involves the emergency plan or affects the implementation of the emergency plan; continue the 50.54(q)(3) Screening for that portion of the activity. Identify the applicable controlling change processes below.
- One or more controlling change processes are selected and fully bounds all aspects of the activity. 50.54(q)(3) Evaluation is NOT required. Identify controlling change processes below and complete Part VI.

**CONTROLLING CHANGE PROCESSES**

10 CFR 50.54(q)

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<b>Part IV. Editorial Change</b> Is this activity an editorial or typographical change such as formatting, paragraph numbering, spelling, or punctuation that does not change intent? Yes, Items 2, 4 & 6 <b>Justification:</b> Item 2 clarifies that Item 3 in Table F-1 is available as a spare and is not reserved. Item 4 locates the Plymouth Fire and Police Radios in the proper Radio Section of Table F-2. Item 6 clarifies that a teletype is a teletypewriter.  "No" is checked because the procedure revision contains other changes that are not editorial.	<input type="checkbox"/> YES 50.54(q)(3) Evaluation is NOT required. Enter justification and continue to next part or complete Part VI as applicable.	<input checked="" type="checkbox"/> NO Continue to next part
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<b>Part V. Emergency Planning Element/Function Screen (Associated 10 CFR 50.47(b) planning standard function identified in brackets) Does this activity affect any of the following, including program elements from NUREG-0654/FEMA REP-1 Section II?</b>	
1. Responsibility for emergency response is assigned. [1]	<input type="checkbox"/>
2. 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. [1]	<input type="checkbox"/>
3. The process ensures that on shift emergency response responsibilities are staffed and assigned. [2]	<input type="checkbox"/>
4. The process for timely augmentation of onshift staff is established and maintained. [2]	<input type="checkbox"/>
5. Arrangements for requesting and using off site assistance have been made. [3]	<input type="checkbox"/>
6. State and local staff can be accommodated at the EOF in accordance with the emergency plan. [3]	<input type="checkbox"/>
7. A standard scheme of emergency classification and action levels is in use. [4]	<input type="checkbox"/>
8. Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes after declaration of an emergency and providing follow-up notifications. [5]	<input type="checkbox"/>
9. Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway. [5]	<input type="checkbox"/>
10. 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. [5]	<input type="checkbox"/>
11. Systems are established for prompt communication among principal emergency response organizations. [6]	<input checked="" type="checkbox"/>
12. Systems are established for prompt communication to emergency response personnel. [6]	<input type="checkbox"/>
13. Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway emergency planning zone (EPZ). [7]	<input type="checkbox"/>
14. Coordinated dissemination of public information during emergencies is established. [7]	<input type="checkbox"/>
15. Adequate facilities are maintained to support emergency response. [8]	<input type="checkbox"/>
16. Adequate equipment is maintained to support emergency response. [8]	<input checked="" type="checkbox"/>
17. Methods, systems, and equipment for assessment of radioactive releases are in use. [9]	<input type="checkbox"/>
18. A range of public PARs is available for implementation during emergencies. [10]	<input type="checkbox"/>

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19. 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. [10]	<input type="checkbox"/>
20. A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events. [10]	<input type="checkbox"/>
21. The resources for controlling radiological exposures for emergency workers are established. [11]	<input type="checkbox"/>
22. Arrangements are made for medical services for contaminated, injured individuals. [12]	<input type="checkbox"/>
23. Plans for recovery and reentry are developed. [13]	<input type="checkbox"/>
24. A drill and exercise program (including radiological, medical, health physics and other program areas) is established. [14]	<input type="checkbox"/>
25. 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. [14]	<input type="checkbox"/>
26. Identified weaknesses are corrected. [14]	<input type="checkbox"/>
27. Training is provided to emergency responders. [15]	<input type="checkbox"/>
28. Responsibility for emergency plan development and review is established. [16]	<input type="checkbox"/>
29. Planners responsible for emergency plan development and maintenance are properly trained. [16]	<input type="checkbox"/>

**APPLICABILITY CONCLUSION**

- If no Part V criteria are checked, a 50.54(q)(3) Evaluation is **NOT** required; document the basis for conclusion below and complete Part VI.
- If any Part V criteria are checked, complete Part VI and perform a 50.54(q)(3) Evaluation.

**BASIS FOR CONCLUSION**

**Item 1:** This change removes a long-standing inaccurate reference to the presence of a Security radio at the Alternate Emergency Operations Facility (AEOF). Prior revisions to the PNPS Emergency Plan were examined resulting in the observation that this administrative error in the matrix appears to have occurred in the distant past, in Revision 13 to the document, and was inadvertently carried over in subsequent revisions Table F-2, Communications Equipment, occurring on the subsequent page of the Emergency Plan, accurately and consistently does not reference a Security radio in the AEOF, and the AEOF Surveillance Sheets contained in EP-AD-302 do not include a security radio during the quarterly surveillance activity. This is an administrative removal of a reference to a Security radio at the AEOF which acts to correct an inaccurate depiction of the presence of a specific radio at the facility. No removal of any actual radio(s) or other equipment is included in this change. This change does not change intent, facilities, equipment or processes for this procedure or affect any planning standard elements. No further evaluation is required for this change.

**Item 5:** This change allows for installation of telephones in the Media Phone Room at the Joint Information Center only when required. With new technology, most if not all, media will have their own means of communication. Telephones will still be available for hookup if necessary. This change does not change intent, facilities, equipment or processes for this procedure or affect any planning standard elements. No further evaluation is required for this change.

**Item 7:** This change removes an unnecessary reference to "no smoking". Pilgrim Station has had a No Smoking in Company facilities policy in place for many years. Therefore, this language is redundant and not needed. This change does not change intent, facilities, equipment or processes for this procedure or affect any planning standard elements. No further evaluation is required for this change.





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Item 8: Tables O-1a and O-1b contained sample training matrices. Locations of the actual training matrices are included in Section O.4. Therefore, these are being removed. This change does not change intent, facilities, equipment or processes for this procedure or affect any planning standard elements. No further evaluation is required for this change.

Item 9: This change provides clarification that the document number for the section of the PNPS Nuclear Training Manual where detailed training matrices are maintained. It also provides the child procedure, EN-TQ-110-01, Fleet EPlan Training Course Summary, to EN-TQ-110, Emergency Response Organization Training, where detailed matrices are maintained. This change does not change intent, facilities, equipment or processes for this procedure or affect any planning standard elements. No further evaluation is required for this change.

Emergency planning elements 6 and 8 in Part V of this form are affected by Item 3. A 10CFR50.54(q) evaluation will be performed to determine whether or not the effectiveness of the PNPS Emergency Plan is reduced and prior NRC approval is required.

#### Part VI. Signatures:

Preparer Name (Print) Karen Larson-Sullivan	Preparer Signature 	Date: 4/12/17
(Optional) Reviewer Name (Print)	Reviewer Signature 	Date:
Reviewer Name (Print) Tim Garvey Nuclear EP Project Manager	Reviewer Signature 	Date: 4/13/17
Approver Name (Print) Donna Calabrese Manager, Emergency Planning or designee	Approver Signature 	Date: 4/17/2017