

Attachment 1 to GNRO-2017/00062

Summary and Analysis of the GGNS Emergency Plan Changes

Procedure/Document Number: Emergency Plan	Revision: 76
Equipment/Facility/Other: Grand Gulf Nuclear Station	
Title: 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)):

Non-Editorial Changes:

1. Page 9-1 Changed section 9.0 title from "Reentry and Recovery" to "Recovery."
2. Page 9-1 Removed section 9.1 "Reentry/Recovery"
3. Page 9-1 Changed section 9.0, 1st sentence: " In any Emergency, the immediate action is directed toward limiting the consequences of the incident, in a manner that affords the maximum protection to the plant personnel, and the general public."
To:
"In any declared Emergency, immediate actions are intended to limit consequences and provide maximum protection to plant personnel, the general public, and plant equipment."
4. Page 9-1 Changed section 9.0, 2nd sentence: "Once the corrective and protective actions have been established an effective control over the situation, the emergency actions shifts into the reentry and the subsequent recovery phases during which all actions are planned and deliberate."
To:
"For a Site Area or General Emergency, once emergency phase corrective and protective actions have been implemented and effective controls established, emergency actions shift to the Recovery phase which includes reentry and recovery operations."
5. Page 9-1 Relocated paragraph 4 under 9.3 "Recovery" to section 9.0 paragraph 4 and changed it from:
"Recovery may be completed by the Emergency Organization before the termination of the emergency. If recovery has not been accomplished by the termination of the emergency, a recovery organization is activated as described in Section 5.5. Its function is to safely and effectively place the plant back in a safe operating condition. Appropriate GGNS and outside assistance is mobilized to accomplish the objective. The Emergency Director is responsible for transmitting the notification that the incident is terminated and reentry/recovery may begin to those agencies connected to the GGNS Operational Hot Line (see Section 7.5.3.a.1)"
To:
"Recovery may be completed by the Emergency Organization before emergency termination. If recovery has not been accomplished by the termination of the emergency, a recovery organization is activated as described in Section 5.5. Its objective is to safely and effectively place the plant back in a safe operating condition or an acceptable long term condition. Appropriate GGNS and outside assistance is mobilized to accomplish this objective. The Emergency Director is responsible for transmitting a notification to those agencies connected to the GGNS Operational Hot Line (see Section 7.5.3.a.1) that the incident is terminated and the plant is transitioning to the Recovery phase."

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Non-Editorial Changes (continued):

6. Page 9-1 Relocated paragraph 7 under 9.3 "Recovery" to section 9.0 paragraph 5 and changed it from: "Recovery operations are conducted in compliance with normal operational radiation exposure levels specified in 10CFR20. When possible, significant releases of radiation during recovery is planned, controlled, evaluated in advance for radiological impact, and appropriate offsite organizations and agencies informed of the scheduled release and estimated impact. Emergency Plan Procedures provide methods of periodically estimating total population exposure."
To:
"Recovery is conducted in compliance with normal occupational dose limits specified in 10CFR20. Significant releases of radioactive materials during recovery is planned, controlled, and evaluated in advance for radiological impact, and appropriate offsite organizations and agencies informed of the scheduled release and estimated impact. Emergency Plan Procedures provide methods of periodically estimating total population exposure."
7. Page 9-2 Relocated section 9.3 "Recovery" to the changed section 9.1 "Recovery Operations"
8. Page 9-2 Added the sentence "More detailed information is provided in Emergency Plan procedures." to the end of the first paragraph in section 9.1, Recovery Operations.
9. Page 9-2 Section 9.1, second paragraph: Changed "...recovery programs..." to "recovery operations".
10. Page 9-1 Changed section 9.2 "Reentry" to section 9.2 "Reentry Operations."
11. General- Procedure 10-S-01-22, Recovery, will be deleted and superseded by EN-EP-613, "Recovery from Declared Emergencies" at the same time this revision is issued.

Editorial Changes:

12. Pages 1,3,4 List of Effective Pages 1,3,4. Revised to update revision numbers for pages changed.
13. Page TOC vii 9.0 Change wording from "Reentry and Recovery" to "Recovery". 9.1 Change wording from "Recovery" to "Recovery Operations". 9.2 Change wording from "Reentry" to "Reentry Operations". 9.3 Delete "Recovery". TOC ii, 5.4.8, corrected misspelling of "Offsite".
14. Page 3-1a, section 3.2.h, Change Re-entry and Recovery to Recovery.
15. Page 9-1, section 9.0 first paragraph: Corrected subject/object/verb position to make the sentences clearer and more grammatically correct and less likely to be misinterpreted.
16. Page 9-1,9-2, 9-3, Removed unnecessary use of "the". Removed unnecessary prepositional phrases. Simplified tenses.
17. Page 9-1, Section 9.0.b Changed "...release of radiation..." to "...release of radioactive materials..."
18. Page 9-1, section 9.0 Third paragraph: Replaced "...before the..." with "prior".
19. Page 9-1, Section 9.0, paragraph 5 Changed "...release of radiation..." to "...release of radioactive materials..."
20. Page 9-2, Section 9.1, second paragraph: Removed "...as required...". Replaced "...investigation..." with "...assessment..."

Procedure/Document Number: Emergency Plan**Revision: 76****Equipment/Facility/Other: Grand Gulf Nuclear Station****Title: Emergency Plan**Editorial Changes (continued):

21. Page 9-2, Section 9.1, second paragraph: Changed "A systematic investigation is conducted to determine the equipment that has been damaged and the extent of the damage to plant equipment."
To:
"A systematic assessment is conducted to determine the extent of damage to plant equipment."
22. Page 9-2, Section 9.1, third paragraph, second sentence – Replaced "Determinations are made as to the repair work required to perform necessary modifications to plant equipment and/or operating procedures. Repair work and approved modifications are carried out as authorized. Test programs to confirm fitness for return to services are to be developed and executed."
To:
"Repair work and modifications to plant equipment and/or changes to operating procedures are determined, approved, and performed. Test programs to confirm fitness for return to services are developed and implemented."
23. Page 9-3, Section 9.2, Reentry Operations: Changed terminology to more accurately define conditions. Removed vague and ambiguous adverbs and adjectives.
24. Page A-11, Changed the following reference to section 9.1: Remove reference to "10-S-01-22", and "10-S-01-23", and "EN-EP-609", and replaced with "EN-EP-613". Replace "Reentry/Recovery" with "Recovery".

Changed the following references to section 9.2: Remove reference to "EN-EP-609", and replace with "EN-EP-613". Replaced "Reentry" with "Recovery Operations".

Remove reference to section 9.3 and all associated references.
25. Page A-14, Replaced reference to procedure "10-S-01-22" and replaced with "EN-EP-613". Replace "Recovery" with "Reentry Operations".
26. Page A-14, Modified the description of 10-S-01-23, Reentry from: " This procedure provides general guidance for the Reentry phase of on emergency."
To :
"This procedure provides general guidance for Reentry operations."
27. Page G-19, Changed the cross reference sections for NUREG 0654 M.3., and M.4 from GGNS E-Plan section "9.3" to "9.0".

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<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?</p> <p>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:</p> <p>Justification:</p> <p><input type="checkbox"/> Bounding document attached (optional)</p>	<p><input type="checkbox"/> YES 50.54(q)(3) Evaluation is NOT required. Enter justification below and complete Part VI.</p>	<p><input checked="" type="checkbox"/> NO Continue to next part</p>
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<p>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)</p> <p>APPLICABILITY CONCLUSION</p> <p><input checked="" type="checkbox"/> If there are no other controlling change processes, continue the 50.54(q)(3) Screening.</p> <p><input type="checkbox"/> 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.</p> <p><input type="checkbox"/> 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.</p>

<p>CONTROLLING CHANGE PROCESSES</p> <p>10CFR50.54 (q)</p>
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<p>Part IV. Editorial Change Is this activity an editorial or typographical change such as formatting, paragraph numbering, spelling, or punctuation that does not change intent?</p> <p>Justification: The following changes are editorial changes per EN-AD-101. No is checked at right because the remaining changes are non-editorial.</p> <p>12. Pages 1,3,4 List of Effective Pages 1,3,4. Revised to update revision numbers for pages changed.</p> <p>13. Page TOC vii 9.0 Change wording from "Reentry and Recovery" to "Recovery". 9.1 Change wording from "Recovery" to "Recovery Operations". 9.2 Change wording from "Reentry" to "Reentry Operations". 9.3 Delete "Recovery". TOC ii, 5.4.8, corrected misspelling of "Offsite".</p> <p>14. Page 3-1a, section 3.2.h, Change Re-entry and Recovery to Recovery.</p> <p>15. Page 9-1 First paragraph: Corrected subject/object/verb position to make the sentences clearer and more grammatically correct and less likely to be misinterpreted.</p> <p>16. Page 9-1,9-2, 9-3 Removed unnecessary use of "the". Removed unnecessary prepositional phrases. Simplified tenses.</p>	<p><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.</p>	<p><input checked="" type="checkbox"/> NO Continue to next part</p>
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Part IV. Editorial Change (continued)

17. Page 9-1, Section 9.0.b Changed "...release of radiation..." to "...release of radioactive materials..."
18. Page 9-1, Third paragraph: Replaced "...before the..." with "prior".
19. Page 9-1, Section 9.1, paragraph 5 Changed "...release of radiation..." to "...release of radioactive materials..."
20. Page 9-2, Section 9.1, second paragraph: Removed "...as required...".
Replaced "...investigation..." with "...assessment..."
21. Page 9-2, Section 9.1, second paragraph: Changed "A systematic investigation is conducted to determine the equipment that has been damaged and the extent of the damage to plant equipment."
To:
"A systematic assessment is conducted to determine the extent of damage to plant equipment."
22. Page 9-2, Section 9.1, third paragraph, second sentence – Replaced "Determinations are made as to the repair work required to perform necessary modifications to plant equipment and/or operating procedures. Repair work and approved modifications are carried out as authorized. Test programs to confirm fitness for return to services are to be developed and executed."
To:
"Repair work and modifications to plant equipment and/or changes to operating procedures are determined, approved, and performed. Test programs to confirm fitness for return to services are developed and implemented."
23. Page 9-3, Section 9.2, Reentry Operations: Changed terminology to more accurately define conditions. Removed vague and ambiguous adverbs and adjectives.
24. Page A-11, Changed the following reference to section 9.1: Remove reference to "10-S-01-22", and "10-S-01-23", and "EN-EP-609", and replace with "EN-EP-613". Replace "Reentry/Recovery" with "Recovery".

Changed the following references to section 9.2: Remove reference to "EN-EP-609", and replace with "EN-EP-613". Replace "Reentry" with "Recovery Operations".

Remove reference to section 9.3 and all associated references.
25. Page A-14, Page A-14, Replaced reference to procedure "10-S-01-22" and replace with "EN-EP-613". Replace "Recovery" with "Reentry Operations".
26. Page A-14, Modified the description of 10-S-01-23, Reentry from: " This procedure provides general guidance for the Reentry phase of on emergency."
To :
"This procedure provides general guidance for Reentry operations."

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27. Page G-19 Changed the cross reference sections for NUREG 0654 M.3., and M.4 from GGNS E-Plan section "9.3" to "9.0".

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?

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 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 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"/>
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"/>

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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 checked="" 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

The following items do not require a 50.54(q) evaluation and the basis is provided:

3. Page 9-1 Changed section 9.0, 1st sentence: " In any Emergency, the immediate action is directed toward limiting the consequences of the incident, in a manner that affords the maximum protection to the plant personnel, and the general public."

To:

"In any declared Emergency, immediate actions are intended to limit consequences and provide maximum protection to plant personnel, the general public, and plant equipment."

The sentence was simplified grammatically and plant equipment was added to the end of the sentence. Protecting plant equipment is important since certain system can be used to mitigate consequences of the event, either by minimizing a release or minimizing further damage to fission product barriers. Inclusion of plant equipment does not affect any of the planning standards in 10CFR50.47 (b), the requirements in 10 CFR 50 Appendix E, or the program elements in NUREG 0654. No further evaluation is required for this change.

5. Page 9-1 Relocated paragraph 4 under 9.3 "Recovery" to section 9.0 paragraph 4 and changed it from: "Recovery may be completed by the Emergency Organization before the termination of the emergency. If recovery has not been accomplished by the termination of the emergency, a recovery organization is activated as described in Section 5.5. Its function is to safely and effectively place the plant back in a safe operating condition. Appropriate GGNS and outside assistance is mobilized to accomplish the objective. The Emergency Director is responsible for transmitting the notification that the incident is terminated and reentry/recovery may begin to those agencies connected to the GGNS Operational Hot Line (see Section 7.5.3.a.1)"

To:

"Recovery may be completed by the Emergency Organization before emergency termination. If recovery has not been accomplished by the termination of the emergency, a recovery organization is activated as described in Section 5.5. Its objective is to safely and effectively place the plant back in a safe operating condition or an acceptable long term condition. Appropriate GGNS and outside assistance is mobilized to accomplish this objective. The Emergency Director is responsible for

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transmitting a notification to those agencies connected to the GGNS Operational Hot Line (see Section 7.5.3.a.1) that the incident is terminated and the plant is transitioning to the Recovery phase." 7.5.3.a.1) that the incident is terminated and the plant is transitioning to the Recovery phase."

The sentence was simplified grammatically, and "...or acceptable long term condition." was added to the end of the 3rd sentence. The prior sentence assumed that the plant could be place back into a safe operating condition. This may not be achievable and an alternative would be to place the plant into an acceptable long term condition. Inclusion of the alternative statement does not affect any of the planning standards in 10CFR50.47 (b), the requirements in 10 CFR 50 Appendix E, or the program elements in NUREG 0654. No further evaluation is required for this change.

6. Page 9-1 Relocated paragraph 7 under 9.3 "Recovery" to section 9.0 paragraph 5 and changed it from: "Recovery operations are conducted in compliance with normal operational radiation exposure levels specified in 10CFR20. When possible, significant releases of radiation during recovery is planned, controlled, evaluated in advance for radiological impact, and appropriate offsite organizations and agencies informed of the scheduled release and estimated impact. Emergency Plan Procedures provide methods of periodically estimating total population exposure."

To:

"Recovery is conducted in compliance with normal occupational dose limits specified in 10CFR20. Significant releases of radioactive materials during recovery is planned, controlled, and evaluated in advance for radiological impact, and appropriate offsite organizations and agencies informed of the scheduled release and estimated impact. Emergency Plan Procedures provide methods of periodically estimating total population exposure."

Changed wording in the first sentence to correct its meaning. "... normal operational radiation exposure levels..." are radiation levels encountered in the plant during normal operations. These are not specified in 10 CFR 20. Replaced with "...normal occupational dose limits ...", which are included in 10 CFR 20.

Changed wording in the second sentence from "...release of radiation..." to "...release of radioactive material". Radiation is always being released from the atom or nucleus.

Neither of these changes affect any of the planning standards in 10CFR50.47 (b), the requirements in 10 CFR 50 Appendix E, or the program elements in NUREG 0654. No further evaluation is required for this change.

11. General- Procedure 10-S-01-22, Recovery, will be deleted and superseded by EN-EP-613, "Recovery from Declared Emergencies" at the same time this revision is issued.

This change is listed as part of editorial changes in section A-14 and A-16. Supersedence of the older procedure by the newer one requires a 50.54(q) review be performed on the new procedure. The review is performed separately and not in this document.

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BASIS FOR CONCLUSION

Non-editorial changes requiring a 50.54(q) evaluation.




The following changes in part or collectively affect the emergency planning standard 13 listed in Part V of this form:

1. Page 9-1 Changed section 9.0 title from "Reentry and Recovery" to "Recovery."
2. Page 9-1 Removed section 9.1 "Reentry/Recovery"
4. Page 9-1 Changed section 9.0, 2nd sentence: "Once the corrective and protective actions have been established an effective control over the situation, the emergency actions shifts into the reentry and the subsequent recovery phases during which all actions are planned and deliberate."
To:
"For a Site Area or General Emergency, once emergency phase corrective and protective actions have been implemented and effective controls established, emergency actions shift to the Recovery phase which includes reentry and recovery operations."
7. Page 9-2 Relocated section 9.3 "Recovery" to the changed section 9.1 "Recovery Operations"
8. Page 9-2 Added the sentence "More detailed information is provided in Emergency Plan procedures." to the end of the first paragraph in section 9.1, Recovery Operations.
9. Page 9-2 Section 9.1, second paragraph: Changed "...recovery programs..." to "recovery operations"
10. Page 9-3 Relocated section 9.3 "Reentry" to section 9.2 and renamed the title "Reentry Operations."

The changes remove "Reentry" as a separate phase that is performed prior to recovery and makes it subordinate to the "Recovery phase". Under the "Recovery phase", "Recovery Operations" and "Reentry Operations" are performed.

A 10CFR50.54 (q) evaluation will be performed to determine whether or not the effectiveness of the emergency plan is reduced and prior NRC approval is required.

Part VI. Signatures:

Preparer Name (Print) Paul Sudnak	Preparer Signature 	Date: 4/21/17
Reviewer Name (Print) David Townsend Nuclear EP Project Manager	Reviewer Signature 	Date: 6/21/17
Approver Name (Print) Jeff Selter Manager, Emergency Planning or designee	Approver Signature 	Date: 6/21/17

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Part I. Description of Proposed Change:

The numbering used below corresponds to the descriptions listed in attachment 9.2, 10 CFR 50.54(q)(2) Screening.

1. Page 9-1 Changed section 9.0 title from "Reentry and Recovery" to "Recovery."
2. Page 9-1 Removed section 9.1 "Reentry/Recovery"
4. Page 9-1 Changed section 9.0, 2nd sentence: "Once the corrective and protective actions have been established an effective control over the situation, the emergency actions shifts into the reentry and the subsequent recovery phases during which all actions are planned and deliberate."
To:
"For a Site Area or General Emergency, once emergency phase corrective and protective actions have been implemented and effective controls established, emergency actions shift to the Recovery phase which includes reentry and recovery operations."
7. Page 9-2 Relocated section 9.3 "Recovery" to the changed section 9.1 "Recovery Operations"
8. Page 9-2 Added the sentence "More detailed information is provided in Emergency Plan procedures." to the end of the first paragraph in section 9.1, Recovery Operations.
9. Page 9-2 Section 9.1, second paragraph: Changed "...recovery programs..." to "recovery operations".
10. Page 9-3 Relocated section 9.3 "Reentry" to section 9.2 and renamed the title "Reentry Operations."

The changes remove "Reentry" as a separate phase that is performed prior to recovery and makes it subordinate to the "Recovery phase". Under the "Recovery phase", "Recovery Operations" and "Reentry Operations" are performed.

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

Performed electronic search of the GGNS Emergency Plan section 9.0, Reentry and Recovery, 9.1 Reentry/Recovery, 9.2, Reentry, Appendix G, page G-4, NUREG-0654 Cross Reference B.7, Appendix G, page G-19, NUREG 0654 Cross Reference M, M.1, M.2, M.3,

Revision 1 of the Emergency Plan was reviewed for the original approved text used to describe Reentry and Recovery. With the exception of the following revision changes, all other changes were editorial or error corrections.

Rev 75, section 9.0: This revision removed Site or General Emergency from the first sentence and resulted in immediate actions applying to all emergencies. The first sentence is a generic statement, and does not contain any commitments or implement any regulations.

Rev 61, section 9.3: This revision changed the name from the Emergency Director/Off-site Emergency Coordinator to the Emergency Director. This was a simple name change, did not change responsibilities and obligations, and consolidated Fleet wide naming convention.

Rev 61, section 9.3: This revision added the 3rd paragraph: "The Emergency Director discusses existing offsite conditions with appropriate State officials prior to terminating a Site Area Emergency or General Emergency classification." This change was evaluated and determined that there were no effects on the GGNS Emergency Plan.

Revision 1 of the Plan approved by the NRC, established the licensing basis for the GGNS Emergency Plan. It, along with the changes in revision 61 and 75, and the changes in revision 76 were considered in their entirety.

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Part III. Describe How the Proposed Change Complies with Relevant Emergency Preparedness Regulation(s) and Previous Commitment(s) Made to the NRC:

10 CFR 50.47 (b)(13) General plans for recovery and reentry are developed:

Site Compliance: Through implementation of this revision, the commitment to comply with the planning standards provided in 10 CFR 50.47 (b)(13) remains, and the requirement for Reentry and Recovery plans remains in the GGNS Emergency Plan.

10 CFR 50 Appendix E, IV, H. Recovery Criteria to be used to determine when, following an accident, reentry of the facility would be appropriate or when operation could be resumed shall be described.

Site Compliance: Through implementation of this revision, the commitment to comply with the regulations provided in 10 CFR 50 Appendix E, IV, H. Recovery remains, and Reentry and Recovery criteria are established and remain in the GGNS Emergency Plan.

Previous NRC commitments - Licensing Research System (LRS) v3.0a was used to search for potential NRC commitment changes as a result of the GGNS Emergency Plan change. There were no identified conflicts with the plan changes and the current NRC commitments. All current NRC commitments that relate to Reentry and Recovery continue to be maintained and fulfilled with this plan change.

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Part IV. Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change:

10 CFR 50.47(b)(13) - Recovery and Reentry Planning

- Plans for recovery and reentry are developed.

Sections IV.H. of Appendix E to 10 CFR 50 provides supporting requirements. Informing criteria appear in Section II.M of NUREG-0654 and the licensee's emergency plan.

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

The change incorporates both Reentry Operations and Recovery Operations under the Recovery phase. During Recovery Operations, plans are established to identify equipment to be repaired, replaced, or returned to service. Priorities are assigned to equipment and systems yielding the highest value to meet Recovery objectives. Personnel are assigned to the Recovery organization based on planned Recovery efforts, priorities, and objectives.

For initial Reentry Operations, area hazards are assessed and evaluated. These assessments, including radiation surveys, are performed in areas associated with critical systems and equipment which have been identified in the Recovery plan as necessary to support Recovery Operations.

The current revision of the GGNS Emergency Plan separates the Reentry phase from the Recovery phase and describes the Recovery phase as being entered subsequent to the Reentry phase. In reality, initial Recovery plans would include Reentry into areas with equipment and systems needed for further stabilizing the plant and establishing additional levels of control. Based on reentry surveys and assessments, Recovery plans may be modified based on significant hazards or impediments in areas identified as critical for Recovery. A reiterative process is likely based on results of ongoing plant hazards assessments and Recovery planning.

A flexible and reiterative process cannot be implemented if elements of the process are predefined, distinct, and sequential.

For this reason, it is logical and prudent to perform both reentry and recovery planning and certain aspects of Reentry and Recovery operations at the same time. This allows modifying plans based on ongoing assessments of plant conditions.

Aside from the benefit of incorporating both Recovery and Reentry Operations into the Recovery phase, the elements of both Reentry and Recovery of the prior revision remain in this revision.

Since Reentry Operations and Recovery Operations elements essentially remain the same with no adverse impact on either Reentry or Recovery, the change and clarification to section 9.0 is not considered a reduction in effectiveness.

The proposed changes to the GGNS emergency plan continue to meet the planning standards outlined in 10 CFR 50.47(b)(14). The effectiveness of the emergency plan is not reduced. The emergency plan changes can be incorporated without prior NRC approval.

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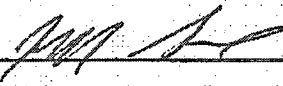
Part VI. Evaluation Conclusion:

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? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| 2. Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. Does the proposed change constitute an emergency action level scheme change? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

If questions 1 or 2 are answered NO, or question 3 answered YES, reject the proposed change, modify the proposed change and perform a new evaluation or obtain prior NRC approval under provisions of 10 CFR 50.90. If questions 1 and 2 are answered YES, and question 3 answered NO, implement applicable change process(es). Refer to step 5.8[8].

Part VII. Signatures

Preparer Name (Print) Paul Sudnak	Preparer Signature 	Date: 6/21/17
Reviewer Name (Print) David Townsend Nuclear EP Project Manager	Reviewer Signature 	Date: 6/21/17
Approver Name (Print) Jeffery Seiter Manager, Emergency Preparedness or designee	Approver Signature 	Date: 6/21/17

Attachment 2 to GNRO-2017/00062

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