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PNP 2018-033

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10 CFR 50.54(q)

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Palisades Nuclear Plant Site Emergency Plan, Supplement 1, Rev 4

Palisades Nuclear Plant
Docket 50-255
License No. DPR-20

Dear Sir or Madam:

The Palisades Nuclear Plant (PNP) Site Emergency Plan (SEP), Supplement 1, Revision 4, was issued on May 31, 2018.

The SEP, Supplement 1 revision was analyzed under Title 10 of the Code of Federal Regulations (10 CFR), Section 50.54(q), *Emergency plans*. Pursuant to 10 CFR 50.4, *Written communications*, Subsection (b)(5)(ii), and 10 CFR 50.54(q)(5), a summary of the 10 CFR 50.54(q) analysis is being submitted.

DESCRIPTION OF CHANGES

The SEP Supplement 1 was revised as follows:

1. Table A-1 (hot and cold charts) gaseous effluent values were revised to reflect updated site boundary 10 year average annual meteorology.

2. Emergency Action Level (EAL) CA 1.1 was revised to include a reference to Note 7 for clarity and consistency.

3. Emergency Action Levels HU 1.1 and HA 1.1 were revised to update the United States Geological Survey (USGS) National Earthquake Information Center (NEIC) earthquake information web address.

4. Alpha numeric designations were changed throughout the document to account for changing of the nomenclature from Off-Normal Procedure (ONP) to Abnormal Operating Procedure (AOP).

DESCRIPTION OF HOW THE CHANGES STILL COMPLY WITH REGULATIONS

The revisions to Table A-1 and EAL CA 1.1 do not impact the EAL scheme. The implementation of the EAL Wall Charts, as revised, maintains the guidance for the personnel assigned responsibility for implementing the Emergency Classification system. The changes do not adversely affect the methods for assessment of radiological consequences or the responsibilities for emergency response organization personnel.

The remaining changes are administrative or editorial in nature, and do not affect the purpose, scope, or intent of the SEP.

Therefore, with these changes, the SEP continues to comply with the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E.

DESCRIPTION OF WHY THE CHANGES WERE NOT A REDUCTION IN THE EFFECTIVENESS OF THE SEP

The revisions to Table A-1 and EAL CA 1.1 continue to meet the planning standard of 10 CFR 50.47(b)(4), and do not represent a reduction in the effectiveness of the SEP because the Offsite Dose Calculation Manual (ODCM) methods used to determine the EAL threshold values have not changed. The EALs associated with the ODCM were updated in response to a change in the ODCM 10-year site boundary average annual (maximum sector) X/Q. The standard EAL scheme is maintained.

The remaining changes are editorial in nature.

These changes do not represent a reduction in the effectiveness of the SEP per 10 CFR 50.54(q)(3), and therefore may be implemented without prior NRC approval.

A copy of the SEP, Supplement 1, is attached.

This letter contains no new commitments and no revisions to existing commitments.

Sincerely,

JAH/bed

Attachment 1: Palisades Nuclear Plant Site Emergency Plan, Supplement 1, Rev 4

CC Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC