



INTERIM STORAGE PARTNERS

NRC Public Meeting – Emergency Response Plan
August 29, 2018



WCS CISF

Emergency Operations Center (EOC)

Emergency Response Vehicle

Emergency Operations Center (EOC)



Goal: Protect our Workforce and Surrounding Community

- Most important criteria for consolidated versus separate Emergency Response Plans (ERPs)
 - Protection of the public
 - Protection of the workers at both WCS and CISF operations
 - Protection of the environment through containing the event
- Unique location that merits a consolidated plan
 - Events requiring implementation of the ERP will, more often than not, impact both facilities because they are co-located
 - Important that there is no confusion on part of responders as to what to do in an emergency (respond to the main gate and receive information and direction)
- Ensures the integration of planning/preparedness activities (development, coordination, drills, exercises, response and recovery planning activities) for both facilities



RG 3.67 Encourages Licensees to Have A Single ERP

- Reg. Guide 3.67 for Emergency Plans encourages Licensees “. . . to have a single emergency plan to meet the requirements of State agencies or the Community Right-To-Know Act, as well as to comply with the regulations of NRC.”
 - Section A Introduction, page 2
 - “Additional material to meet these other regulations should either be included in the plan or referenced in the licensee’s emergency plan submitted to NRC. This additional material will be reviewed by NRC only to ensure that it does not diminish compliance with NRC’s requirements.”
- “The implementing procedures are the heart of the emergency response. They must be clear, precise, and easily understood. Each procedure should pertain to a narrow, specific response action.”



Implementing Procedures Center of Emergency Response

- Detailed implementing procedures are already established and cover most of the postulated accident scenarios as directed in Reg. Guide 3.67
- A significant amount of emergency response resources are gained by having one, consolidated ERP
 - Additional trained/qualified personnel and radiological analytical resources are available for a common response



EPZ Does Not Diminish Compliance with NRC's Requirements

- The Emergency Planning Zone (EPZ) comes from the U.S. Environmental Protection Agency (USEPA) Office of Radiation Programs “Manual of Protective Action Guides and Protective Actions for Nuclear Incidents”, which conforms to both Texas and New Mexico requirements for the existing WCS operations
 - EPZ is not required for the CISF per the SAR and 10 CFR 72.32.
 - EPZ does not conflict with NRC requirements and is an added administrative protection measure
- The 3.7-mile EPZ is based on the postulated accidents and the doses (based on 10 mRem/yr regulatory air pathway and 2 mRem/hr regulatory dose constraints) resulting from the WCS evaluated accidents
 - 3.7-mile boundary set by existing WCS Operations



Example Event Types and Impacts

INCIDENTS & EFFECTS ON SITES							
	Wild Fire	Building/Storage Area Fire	Injured Worker	Explosion	Lightning	Flood	Tornado
CISF Site	YES ¹	YES ¹	YES	YES ²	YES ³	NO	YES
WCS Sites	YES ¹	YES ¹	YES	YES ²	YES ³	YES*	YES
ALL Sites	YES ¹	YES ¹	NO**	YES ²	YES ³	NO	YES

* Flood in WCS Site would shut down disposals till cells could be recovered.

** The access road may be shut down for a short period of time

¹ Dependent on location and severity of Fire

² Dependent on location and severity of Explosion

³ Dependent on proximity of lightning - outdoor activities first and then possibly indoor movement of certain material to include placing all operations in a safe configuration



Coordination with New Mexico and Texas

- Coordination between Texas and New Mexico already exists in Memorandums of Understanding (MOUs) with the City of Eunice, City of Andrews, Andrews Sherriff & Police departments, Carlsbad Medical Center, Lea Regional Medical Center, and Permian Regional Medical Center
 - 911 emergencies go to the Lea County Sheriff's Department and Andrews County Sheriff's Department so coordinated response can commence immediately
 - In addition, 911 dispatch calls the WCS Guard House for confirmatory purposes
- The coordination MOUs will be updated to include the CISF once the license is granted, but before receipt of fuel at the CISF
- See Appendix D of ERP – Draft updated MOUs



Emergency Response Plan Change Process

- The NRC and the Texas Commission of Environmental Quality (TCEQ) share common goals – protecting the public, workers and the environment
 - Plan changes expected to be infrequent and not substantive
- ISP/WCS will use approved methods to screen changes to determine whether they affect the CISO, LLW facility, or both, and apply respective change control process
 - Most of the Plan applies to both; would apply both change control processes
- NRC
 - Changes reviewed under 10 CFR 72.44(f) to determine whether a change must be approved by the NRC (*i.e.*, whether it decreases effectiveness)
 - Reported within six months after change is made
- TCEQ
 - Approval of Plan changes prior to implementation
 - License condition to implement most recent version of Plan
- ISP/WCS will iterate on changes if any disagreement



Emergency Action Level

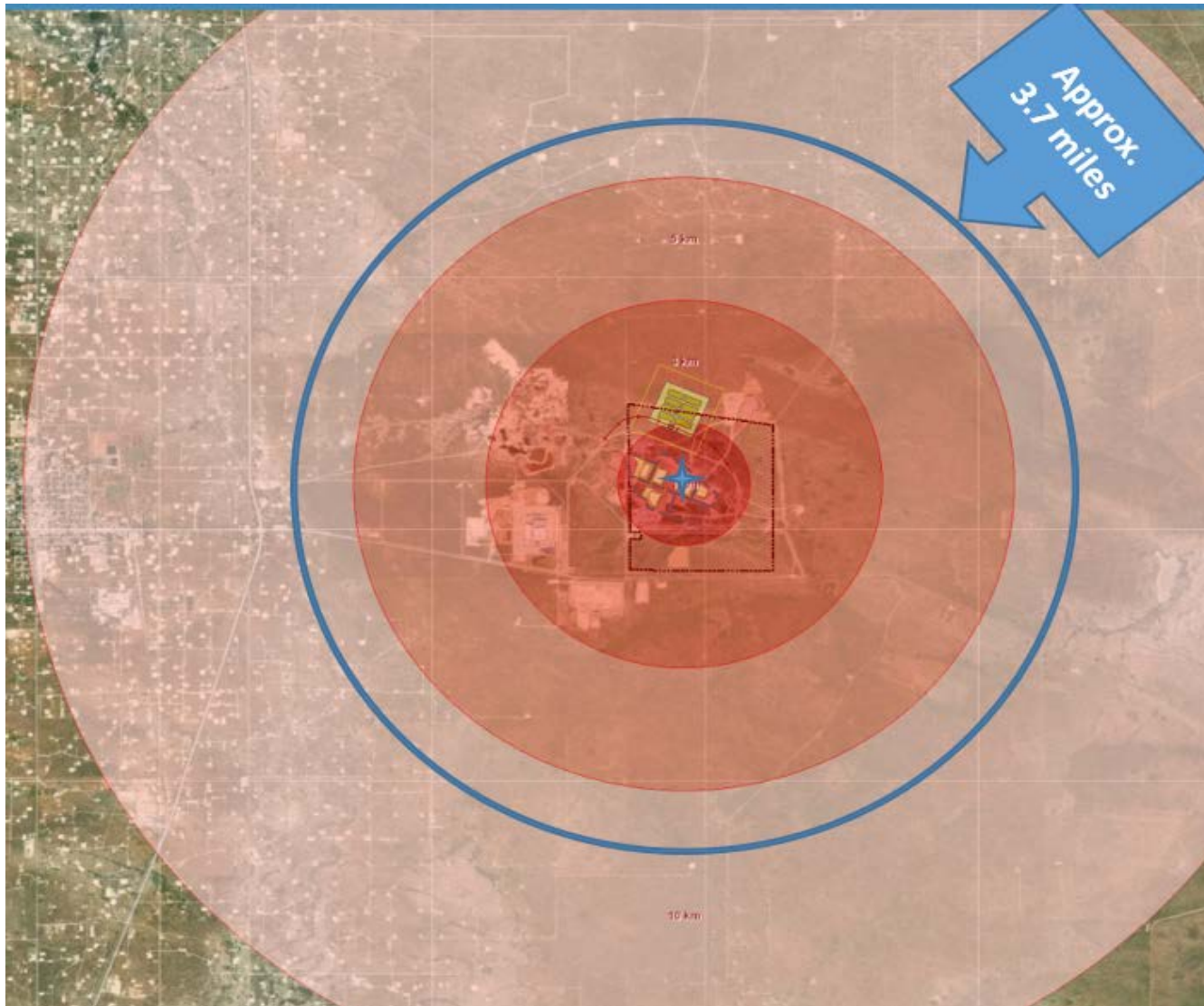
- Emergency actions (Alert or Site Area Emergency) are derived from Reg. Guide 3.67, Section 3.2
- The WCS CERP Table B in Section 5.5, Exposure Control, uses Protective Action Guides taken out of “Manual of Protective Action Guides and Protective Actions for Nuclear Incidents,” Office of Radiation Programs, USEPA, 1992
- The TCEQ rule §336.210 is in agreement with Reg Guide 3.67 and the USEPA manual of Protective Action Guides. In addition, TCEQ rule §336.210 further defines accidents as “alerts” and “site area emergencies” while 10 CFR 72.32 ONLY requires the classification of “alert” for Independent Spent Fuel Storage Installation Facilities
- The submitted Consolidated ERP meets both the NRC requirements and the TCEQ requirements since TCEQ is an agreement state



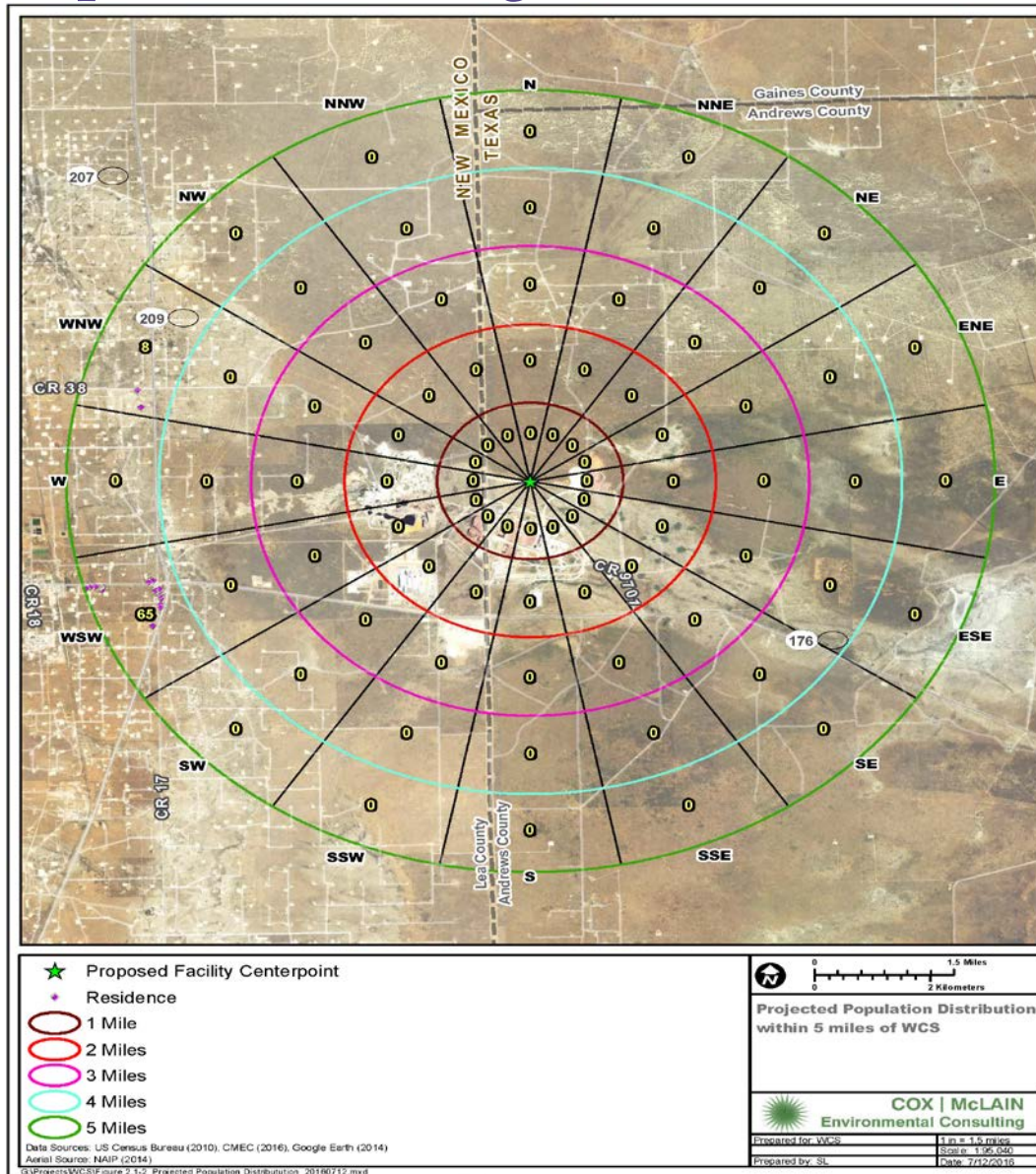
Backup Slides



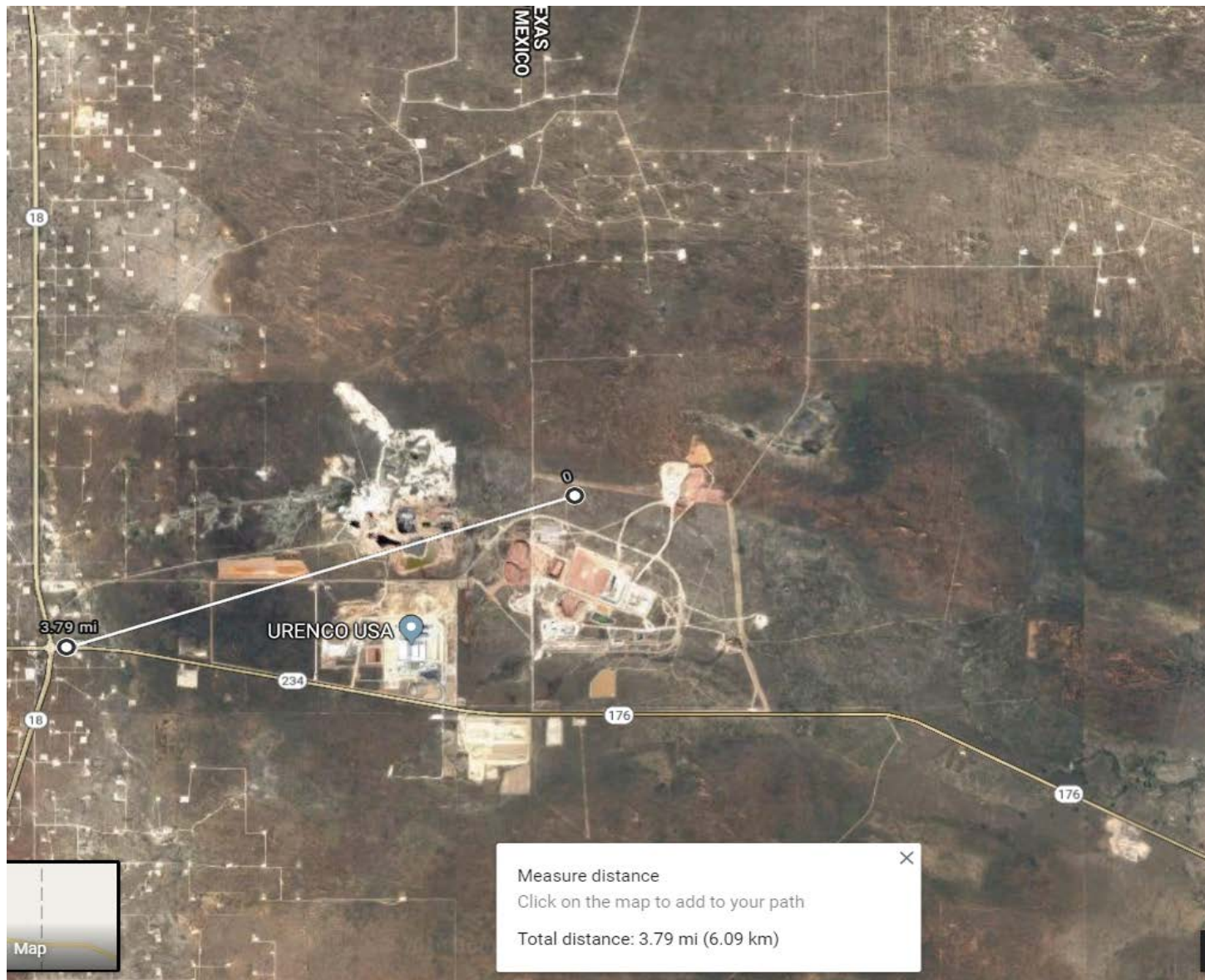
RACER Map Depicting the EPZ w/1, 3, 5, 10 km Overlay



Zero Population Living Within the EPZ



~Distance from CISF to HWY intersect of NM 18 / TX176 (NM 234)



Predominant Wind Direction and Met Tower Locations

