

License Amendment Request for Change in Emergency Plan Staff Augmentation Response Times

Pre-Submittal Meeting for:
Vistra Operations Company LLC,
Comanche Peak Nuclear Power Plant (CPNPP)
September 17, 2018

Participants

- USNRC

- CPNPP

AGENDA

- Pre-Submittal Meeting Purpose
- Emergency Plan Licensing Basis
- Proposed Emergency Plan Changes
- LAR Format
- LAR Schedule
- Conclusions
- Questions?

Pre-Submittal Meeting Purpose

- Establish communication with NRC staff in order to identify:
 - applicable review criteria
 - level of detail needed
 - applicability of precedents
 - feasibility of desired schedule
- Outline proposed Emergency Plan changes
- Discuss LAR Development process and preliminary content

CPNPP Emergency Plan Licensing Basis

- Last NRC Approved Plan - Revision 11, approved August 1989
- Current Emergency Plan - Revision 42, dated August 2018
- The LAR includes an analysis of the NUREG-0654 Table B-1 functions as implemented in the Emergency Plan between the last approved, current, and proposed revisions (example below).

Major Functional Area	Major tasks	Position Title/Expertise	Table B-1 On-Shift	CPNPP Rev 11 On-Shift	CPNPP Rev 42 On-Shift	CPNPP Proposed On-Shift
Plant Operations & Assessment of Operational Aspects		Shift Manager (SRO)	1	1	1	1
		Unit Supervisor (SRO)	1	1	2	2
		Reactor Operator (RO)	2	3	4	4
		Nuclear Station Operator	2	3	7	7
Emergency Direction and Control		Shift Manager (SRO)	1**	1**	1**	1**

Proposed Emergency Plan Changes

- Extend augmenting Emergency Response Organization (ERO) to 60 and 90 minute response times (from 40 and 70 respectively).
- Reduce the number of required ERO augmentation positions through consolidation and elimination.

Reason for Proposed Changes

- Significant increases in the number of on-shift positions have occurred over the years.
 - Current, Revision 42 from August 2018 - **24** positions
 - Last NRC-approved Emergency Plan, Revision 11 from 1989 - **10** positions
- ERO augmentation times at 40 and 70 minutes.
 - Limits pool of qualified personnel to fill open ERO spots
 - No credit provided for advances in technology, training and procedures that assist on-shift staff in coping with an event

LAR Format

- LAR follows NEI 06-02, “License Amendment Request (LAR) Guidelines”
- Enclosures/Attachments include:
 - Technical Justification based on improvements in plant systems, procedures, dose assessment, and training
 - Contains a functional analysis of NUREG-0654, Table B-1 Major Tasks
 - Summary table of Emergency Plan changes
 - Marked up (red line) copy of the Emergency Plan
 - Clean copy of the Emergency Plan
 - ERO Task Analysis
 - Table B-1 Comparative Chart
 - Letters of Offsite Response Organization Concurrence

Regulatory Guidance

- RG 1.219, “Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors”
- NUREG-0654/FEMA-REP-1, Rev. 1, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants”
- NSIR/DPR-ISG-01, “Interim Staff Guidance Emergency Planning for Nuclear Power Plants”
- RIS 2016-10, “License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation”
- NEI 10-05, “Assessment of On-Shift Emergency Response Organization Staffing and Capabilities”

Precedents

- Susquehanna (ML030830543)
- Fermi (ML102700478)
- River Bend (ML012710218)
- Watts Bar (ML041810056)
- Point Beach (ML16118A54)
- Duane Arnold (ML16263A071)
- Monticello (ML17083A083)
- Prairie Island (ML17055C359)
- Wolf Creek (ML18135A145) [pending NRC review and approval]

LAR Schedule

- Submittal of LAR by 10/30/2018
- Request approval by 10/30/2019
- Propose a 180 day implementation period

Conclusions

- Proposed staffing continues to minimize impact of radiological emergencies and provides protection of public health and safety.
- Supported by Technical Justification and Functional Analysis.
- Revised Emergency Plan continues to meet §50.54(q)(2), §50 Appendix E, and the planning standards of §50.47(b).
- Draft on-shift staffing analysis completed to verify that ERO positions were not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the Emergency Plan.

Questions?

