SNC LICENSE AMENDMENT REQUEST FOR PROPOSED CHANGES TO EMERGENCY RESPONSE ORGANIZATION STAFFING AND AUGMENTATION

FEBRUARY 5, 2019

Southern Nuclear

SNC Staffing and Augmentation LAR

Objectives

SNC plans to submit a license amendment request (LAR) to revise the SNC Standard Emergency Plan and Site Annexes to reduce on-shift staffing levels and extend certain Emergency Response Organization (ERO) augmentation times. The purpose of this meeting is to gain a common understanding of this project and the necessary LAR contents.

Considerations

- Recent industry submittals
- Recent NRC draft guidance

Proposed Changes

- Reformat staffing table to align Operations staffing with recent NRC guidance
- Reduce On-shift staffing for Maintenance (4), RP (1) and Chemistry (1) positions
- Relocate references to administrative positions for TSC, OSC, EOF and JIC from the SNC Emergency Plan to Fleet Emergency Plan Implementing Procedures
- Extend dispatch of second Field Monitoring Team at the Alert or higher classification to 90 minutes

Proposed Changes (continued)

- Revise Augmented ERO Response Times
  - Maintain 75-minute response for Control Room *Support* functions (Oversight, Initial Assessment, Troubleshooting) to include;
    - Maintenance (2 positions)
    - RP Technicians (3 positions)
    - First Field Monitoring Team (2 positions)
    - Engineering (3 positions)
    - Operations Supervisor (1 position reporting to Control Room)
  - Extend response times for remaining ERO positions associated with Control Room *Relief* functions to 90 minutes (Transfer of Command and Control responsibilities)
- TSC, OSC and EOF Activation would occur at 90 minutes

Current and Proposed Staffing

- Current Staffing
  - On-Shift Staff of 25
    - Operations Staff – 16
    - Chemistry & RP Techs – 5
    - Maintenance – 4
  - Augmented Staff of 44
    - 30, 75-minute minimum staff response positions
    - 14 additional positions respond at 75 minutes
- Proposed Staffing
  - On-Shift Staff of 13
    - Operations Staff Performing EP Functions – 10
    - Chemistry & RP Techs – 3
  - Augmented Staff of 45
    - 25, 75 and 90-minute minimum staff response positions
    - 20 additional support staff augmented at 90 minutes

Basis for Proposed Changes

Plant Operations and Assessment of Operational Aspects

- Augmented Direction and Control function in the Control Room.
  - The proposed change maintains the 75-minute augmented response by the Operations Supervisor and Reactor Engineer which allows the on-shift Emergency Director to focus on event classification and Emergency Plan implementation oversight for an additional 15 minutes without conflicts.

Notification and Communication

- Revised on-shift operations resources to include 2 positions available for emergency communications.
  - The proposed change provides for dedicated resources assigned to State/local and Federal notification and supports the performance of this activity for an additional 15 minutes without conflicts.

Basis for Proposed Changes (continued)

Radiological Assessment

- Maintain 2 RP Technicians on-shift for performance of radiological assessment and protective action tasks
  - New definition of Onsite (out-of-plant) Survey allows for more efficient completion of PA boundary surveys for inputs to dose assessment.
- Maintain 75-minute augmented response by 3 RP Technicians for assessment and protective action tasks as well as dispatch of the first Field Monitoring Team
  - Continues to support performance of onsite and off-site radiological assessments as currently performed.
- Extend response of 3 additional RP Technicians and the second field monitoring Team to 90 minutes
  - Maintaining on-shift positions and augmented response 75 minutes after an event continues to provide for public health and safety.

Basis for Proposed Changes (continued)

Plant System Engineering / Repair and Corrective Actions

- Maintain 75-minute augmented response by Engineering
  - This approach allows the Reactor Engineer and Engineering Support positions to continue initial troubleshooting at 75 minutes in support of Control Room activities.
- Remove maintenance personnel from on-shift
  - Crediting Emergency Core Cooling System (ECCS) capability for the first 75 minutes after an event, maintaining Maintenance response by 2 positions at 75 minutes and extending response to additional maintenance resources to 90 minutes, continues to provide for public health and safety.

QUESTIONS?