



Palo Verde

License Amendment Request for Emergency Plan

July 11, 2019

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- Change based on the following:
 - NRC June 12, 2018 correspondence to NEI, Alternative Guidance for Licensee Emergency Response Organizations (ML18022A352)
 - Technical Basis for Section II.B, Table B-1 of NUREG-0654, Revision 2 (ML16117A427)
 - Exelon Midwest License Amendment Request (ML18053A159) and approved Safety Evaluation (ML19036A586) for changes to their Emergency Response Organization



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Critical Elements of License Amendment Request

- No change to current augmentation timeframes and process
 - Augment at Alert for all facilities and ERO positions
 - Use of an “All Call” and duty roster process for staffing
 - 60 minutes during normal working hours and 120 minutes off hours
- Supplemented Rev. 2 NUREG 0654 on shift ERO to support maintaining 120 minute off hours augmentation
 - Increase RP technicians to support onsite or offsite monitoring as needed
 - RP Supervision/Dose Assessment on-shift
 - Ensure that key ERO functions can be maintained for timeframe prior to augmented resources arrival



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Critical Elements of License Amendment Request (cont'd)

- Remove on-shift Chemistry and Maintenance personnel
- Increase number of augmented ERO consistent with guidance in Rev. 2
- Remove non-minimum staff positions from the emergency plan (maintain in procedures)
- State of Arizona has reviewed and supports this amendment request
- State and federal agencies will be invited to a once every drill cycle minimum staff drill



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Additional resources to support the key ERO functions remain in place on-shift:

- Additional Radiation Protection support for onsite and offsite field monitoring is available if needed
- The number of auxiliary operators on site (12, 4 per unit) allows for additional efforts to support operations and maintenance critical activities during the 120 minute augmentation time
- Dose Assessment and Radiation Protection leadership available on shift
- Offsite communications to State and Local government and the NRC



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Additional resources to support the key ERO functions remain in place on shift (cont'd):

- Engineering Support in the form of the unaffected unit Shift Technical Advisor
- Security Leadership to support the callout process
- Augmented Command and Control assistance to the affected Unit Shift Manager in the form of two on-shift Shift Managers/Emergency Coordinators from the unaffected Units
- Shift Managers, Control Room Supervisors and Shift Technical Advisors are trained to the Emergency Coordinator position qualification



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- Schedule for LAR submittal
 - 3rd Quarter 2019
- NRC review and Issuance of Safety Evaluation
 - 1 year
- Scheduled Implementation
 - Six Months following approval

Discussion/Questions