



FEMA

July 29, 2019

Mr. Joseph Anderson
Operating Reactors Licensing Outreach Branch
Division of Preparedness and Response
Office of the Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

SUBJECT: Federal Emergency Management Agency (FEMA) Review Requested of Revision to the Duane Arnold Energy Center (DAEC) Emergency Plan to Address the Permanently Defueled Condition

Dear Mr. Anderson:

The FEMA Radiological Emergency Preparedness (REP) Program received your letter dated April 30, 2019, requesting FEMA's review of the proposed licensee staffing changes against the current FEMA approved state and local Radiological Emergency Preparedness Plans regarding the Duane Arnold Energy Center (DAEC) Emergency Plan. The proposed changes to the DAEC Emergency Plan would eliminate specific on-shift and augmented emergency response organization (ERO) positions based on written certification to the U.S. Nuclear Regulatory Commission (NRC) under 10 CFR 50.82(a)(1) of the permanent cessation of reactor operation and transfer of spent fuel from the reactor vessel.

The FEMA Region VII and Headquarters REP staff reviewed the proposed licensee staffing changes to the DAEC on-shift and augmented ERO against the current FEMA approved State of Iowa, and local municipalities REP Plans. As a result of this detailed review, FEMA is requesting that the NRC provide additional information based on the enclosed questions. Until this information is provided, FEMA cannot conclusively determine if a validation drill is warranted.

In addition, without this additional information, FEMA cannot affirm that no adverse impacts exist that would preclude the effective implementation of state and local REP Plans or impact FEMA's finding of reasonable assurance for DAEC.

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If you have any questions or concerns, please contact me at 202-212-2849 or Timothy Harris III at 202-765-6727.

Sincerely,

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Date: 2019.07.29 12:33:30 -04'00'

Vanessa E. Quinn
Chief
Radiological Emergency Preparedness Branch

Enclosure: Region VII Proposed questions

cc: Tom Morgan, RAC Chair, Region VII

Questions proposed by Region VII.

- Section 2.3 Description of Proposed Changes (p. 4): The last paragraph references two other requests NEDA has or will submit to NRC regarding the position titles “Certified Fuel Handler” and “Non-Certified Operator”, which are key positions in the proposed post-shutdown on-shift staff. The following page notes that “specific training requirements of the NCO position will be developed... with an emphasis on systems and processes important to maintaining SFP cooling... {and} applicable aspects of the DAEC Emergency Plan related NCO duties.”. This doesn’t give a very good picture of what the NCO will be responsible to do in relation to interfacing with OROs, or what training related to offsite preparedness and response they will receive. The NCOs seem to be taking on several other responsibilities (current Control Room Operators and Auxiliary Operators), so it is unclear if there has been an assessment of their ability to perform the additional duties related to offsite notification and coordination, or what those additional duties would be.
- Section 3.2.1.3 Major Functional Area: Notification/Communications (p. 10): The proposal is for the current Shift Communicator position be replaced by an on-shift NCO for notification of OROs. There are 2 sentences in this section that refer to notification of offsite authorities within 15 minutes. The rest of the section focuses on notification and communications with NRC. It isn’t clear if their analysis of the NCO duties included communications with OROs or just NRC. The document refers several times to their ‘analysis of proposed post-shutdown on-shift staffing’, but the analysis results, methodology, etc. are not provided.
- Section 3.2.2 ERO Staffing, Table 1 (p. 20-21): All EOF and JIC positions are retained in the proposed post-shutdown ERO staffing, so on the surface it seems our primary concern would be the reduced on-shift staffing.
- DAEC Emergency Plan, Assignment of Responsibilities (p. 39): subparagraph € Public Health and Protective Response – notes that the Operations Shift Manager, acting as the Emergency Coordinator, is responsible for contact and coordination with public officials. This responsibility transitions to the Emergency Coordinator (assisted by the Site Radiation Protection coordinator), then when the EOF is activated it transitions to the Radiological and EOF Manager. There is no reference to a “Non-Certified Operator” in this (or other ORO-related) sections of the DAEC Emergency Plan.
- DAEC Emergency Plan, Emergency Response Organization (p. 73): Major Functional Area “Notification/Communications” does not list an NCO with this responsibility in the on-shift staffing. It includes an NRC ENS Communicator in the Tech Support Center, but it is not clear if that position would also interface with OROs.