

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 6

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Screening and Evaluation Number	Applicable Sites	
EREG #: <u>02279026</u>	BNP	<input type="checkbox"/>
	CNS	<input type="checkbox"/>
	CR3	<input type="checkbox"/>
	HNP	<input type="checkbox"/>
5AD #: <u>02278957</u>	MNS	<input checked="" type="checkbox"/>
	ONS	<input type="checkbox"/>
	RNP	<input type="checkbox"/>
	GO	<input type="checkbox"/>

Document and Revision	Emergency Plan Section J 19-01
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Part I. Description of Proposed Change:

Change #	Plan Section	Current Revision	Proposed Revision	Reason
1	Section J.7 Second paragraph	Protective Action Guides are adopted from EPA 400-R-92-001 and in the State Plan guidance on the use of KI and are shown in Figure J-1. A flowchart to aid the Emergency Coordinator/EOF Director in making Protective Action Recommendations is also shown in Figure J-1. {PIP-G-03-606}	Protective Action Guides are adopted from EPA 400-R-92-001 and in the State Plan guidance on the use of KI. A flowchart to aid the Emergency Coordinator/EOF Director in making Protective Action Recommendations is also shown in Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations. {PIP-G-03-606}	Deleted 'and are shown in Figure J-1' and Figure J-1 and reference procedure AD-EP-ALL-0109 which contains the same flow chart as previously shown in Figure J-1.
2	Section J.7 Fifth paragraph	... These dose projections are compared to the Protective Action Guides in Figure J-1, which are derived from the "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" (EPA-400-R-92-001) and in the State Plan guidance on use of KI. These dose projections are compared to the Protective Action Guides in Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations, which are derived from the "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" (EPA-400-R-92-001) and in the State Plan guidance on use of KI.	Deleted 'in Figure J-1' and reference procedure AD-EP-ALL-0109 which contains the same flow chart as previously shown in Figure J-1.

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4	Section J.10.a	Figures J-1 and 2 describe the EPZ's, ...	Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations and Figures J-2 describe the EPZ's, ...	Added procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations, removed Figure J-1.
6	Section J.10.m	Figure J-1 describes the considerations used by Duke management in developing protective action recommendations.	Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations describes the considerations used by Duke management in developing protective action recommendations.	Removed procedure level guidance from Emergency Plan and reference applicable procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations.
7	Figure J-1	PAR Flow Chart	Deleted	Figure J-1 contained the same information as Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations Attachment 4.

Attachment 6, 10 CFR 50.54(q) Initiating Condition (IC) and Emergency Action Level (EAL) and EAL Bases Validation and Verification (V&V) Form, is attached (required for IC or EAL change)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
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Part II. Description and Review of Licensing Basis Affected by the Proposed Change:

Licensing Basis

McGuire Emergency Plan Change 2 (dated February 13, 1981)

Current Emergency Plan

Emergency Plan, Revision 18-3

Part III. Description of How the Proposed Change Complies with Regulation and Commitments.

If the emergency plan, modified as proposed, no longer complies with planning standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50, then ensure the change is rejected, modified, or processed as an exemption request under 10 CFR 50.12, Specific Exemptions, rather than under 10 CFR 50.54(q):

Change 1 – Changed Section J.7 Second paragraph from “Protective Action Guides are adopted from EPA 400-R-92-001 and in the State Plan guidance on the use of KI and are shown in Figure J-1. A flowchart to aid the Emergency Coordinator/EOF Director in making Protective Action Recommendations is also shown in Figure J-1. {PIP-G-03-606}” to “Protective Action Guides are adopted from EPA 400-R-92-001 and in the State Plan guidance on the use of KI. A flowchart to aid the Emergency Coordinator/EOF Director in making Protective Action Recommendations is also shown in Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations. {PIP-G-03-606}”. Deleted ‘and are shown in Figure J-1’ and Figure J-1 and reference procedure AD-EP-ALL-0109 which contains the same flow chart as previously shown in Figure J-1. Protective Action Recommendations (PARs) continue to be developed for the plume exposure pathway EPZ for emergency workers and the public, as described in Section J of the Emergency Plan (Protective Response), using procedure AD-EP-ALL-0109. Thus, the

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Emergency Plans will continue to comply with 10 CFR 50.47(b)(10) Protective Response and 10 CFR Part 50 Appendix E, Section IV.D. Notification Procedures.

Change 2 – Changed Section J.7 Fifth paragraph from “... These dose projections are compared to the Protective Action Guides in Figure J-1, which are derived from the "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" (EPA-400-R-92-001) and in the State Plan guidance on use of Kl. ...” to “... These dose projections are compared to the Protective Action Guides in Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations, which are derived from the "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" (EPA-400-R-92-001) and in the State Plan guidance on use of Kl.”. Deleted ‘in Figure J-1’ and reference procedure AD-EP-ALL-0109 which contains the same flow chart as previously shown in Figure J-1. Protective Action Recommendations (PARs) continue to be developed for the plume exposure pathway EPZ for emergency workers and the public, as described in Section J of the Emergency Plan (Protective Response), using procedure AD-EP-ALL-0109. Thus, the Emergency Plans will continue to comply with 10 CFR 50.47(b)(10) Protective Response and 10 CFR Part 50 Appendix E, Section IV.D. Notification Procedures.

Change 4 – Changed Section J.10.a from “Figures J-1 and 2 describe the EPZ's, ...” to “Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations and Figures J-2 describe the EPZ's, ...”. Added procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations, removed Figure J-1. Protective Action Recommendations (PARs) continue to be developed for the plume exposure pathway EPZ for emergency workers and the public, as described in Section J of the Emergency Plan (Protective Response), using procedure AD-EP-ALL-0109. Thus, the Emergency Plans will continue to comply with 10 CFR 50.47(b)(10) Protective Response and 10 CFR Part 50 Appendix E, Section IV.D. Notification Procedures.

Change 6 – Changed Section J.10.m from “Figure J-1 describes the considerations used by Duke management in developing protective action recommendations.” to “Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations describes the considerations used by Duke management in developing protective action recommendations.” Removed procedure level guidance from Emergency Plan and reference applicable procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations. Protective Action Recommendations (PARs) continue to be developed for the plume exposure pathway EPZ for emergency workers and the public, as described in Section J of the Emergency Plan (Protective Response), using procedure AD-EP-ALL-0109. Thus, the Emergency Plans will continue to comply with 10 CFR 50.47(b)(10) Protective Response and 10 CFR Part 50 Appendix E, Section IV.D. Notification Procedures.

Change 7 – Deleted Figure J-1 as it contains the same information as Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations Attachment 4. Protective Action Recommendations (PARs) continue to be developed for the plume exposure pathway EPZ for emergency workers and the public, as described in Section J of the Emergency Plan (Protective Response), using procedure AD-EP-ALL-0109. Thus, the Emergency Plans will continue to comply with 10 CFR 50.47(b)(10) Protective Response and 10 CFR Part 50 Appendix E, Section IV.D. Notification Procedures.

The differences in approved revisions and the current revisions of the Emergency Plans have been reviewed, and they have been determined to continue to meet NRC requirements as described in 10 CFR 50.47(b) and 10 CFR 50, Appendix E during the course of revisions.

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Part IV. Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change (Address each function identified in Attachment 4, 10 CFR 50.54(q) Screening Evaluation Form, Part IV of associated Screen):

10 CFR 50.47(b)(10) - Protective Response

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. Evacuation time estimates have been developed by applicants and licensees. Licensees shall update the evacuation time estimates on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

10CFR50 Appendix E.IV.D. Notification Procedures

1. Administrative and physical means for notifying local, State, and Federal officials and agencies and agreements reached with these officials and agencies for the prompt notification of the public and for public evacuation or other protective measures, should they become necessary, shall be described. This description shall include identification of the appropriate officials, by title and agency, of the State and local government agencies within the EPZs.

The associated EP Function is Function 10a, "A range of public PARs is available for implementation during emergencies."

Program Elements NUREG-0654 Section II.J. - Protective Response

J.7. Each licensee shall establish a mechanism for recommending protective actions to the appropriate State and local authorities. These shall include Emergency Action Levels corresponding to projected dose to the population-at-risk, in accordance with Appendix 1 and with the recommendations set forth in Tables 2.1 and 2.2 of the Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (EPA-520/1-75-001). As specified in Appendix 1, prompt notification shall be made directly to the offsite authorities responsible for implementing protective measures within the plume exposure pathway Emergency Planning Zone.

Part V. Description of Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions:

Change 1 – Changed Section J.7 Second paragraph from "Protective Action Guides are adopted from EPA 400-R-92-001 and in the State Plan guidance on the use of KI and are shown in Figure J-1. A flowchart to aid the Emergency Coordinator/EOF Director in making Protective Action Recommendations is also shown in Figure J-1. {PIP-G-03-606}" to "Protective Action Guides are adopted from EPA 400-R-92-001 and in the State Plan guidance on the use of KI. A flowchart to aid the Emergency Coordinator/EOF Director in making Protective Action Recommendations is also shown in Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations. {PIP-G-03-606}". Deleted 'and are shown in Figure J-1' and Figure J-1 and reference procedure AD-EP-ALL-0109 which contains the same flow chart as previously shown in Figure J-1. Protective Action Recommendations (PARs) continue to be developed for the plume exposure pathway EPZ for emergency workers and the public, as described in Section J of the Emergency Plan (Protective Response), using procedure AD-EP-ALL-0109.

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projections are compared to the Protective Action Guides in Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations, which are derived from the "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" (EPA-400-R-92-001) and in the State Plan guidance on use of KI. Deleted 'in Figure J-1' and reference procedure AD-EP-ALL-0109 which contains the same flow chart as previously shown in Figure J-1. Protective Action Recommendations (PARs) continue to be developed for the plume exposure pathway EPZ for emergency workers and the public, as described in Section J of the Emergency Plan (Protective Response), using procedure AD-EP-ALL-0109.

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Change 6 – Changed Section J.10.m from "Figure J-1 describes the considerations used by Duke management in developing protective action recommendations." to "Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations describes the considerations used by Duke management in developing protective action recommendations." Removed procedure level guidance from Emergency Plan and reference applicable procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations. Protective Action Recommendations (PARs) continue to be developed for the plume exposure pathway EPZ for emergency workers and the public, as described in Section J of the Emergency Plan (Protective Response), using procedure AD-EP-ALL-0109.

Change 7 – Deleted Figure J-1 as it contains the same information as Procedure AD-EP-ALL-0109, Off Site Protective Actions Recommendations Attachment 4. Protective Action Recommendations (PARs) continue to be developed for the plume exposure pathway EPZ for emergency workers and the public, as described in Section J of the Emergency Plan (Protective Response), using procedure AD-EP-ALL-0109.

The changes described provide assurance that the normal plant operating organization and ERO has the ability and capability to:

- respond to an emergency;
- perform functions in a timely manner;
- effectively identify and take measures to ensure protection of the public health and safety; and
- effectively use response equipment and emergency response procedures.

The changes described do not reduce the effectiveness of the McGuire Nuclear Station Emergency Plan, as written and approved; and continue to meet NRC requirements, as described in 10 CFR 50.47(b) and 10 CFR 50, Appendix E.

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Part VI. Evaluation Conclusion.			
Answer the following questions about the proposed change.			
1	Does the proposed change comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2	Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
3	Does the proposed change maintain the current Emergency Action Level (EAL) scheme?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4	Choose one of the following conclusions:		
a	The activity does continue to comply with the requirements of 10 CFR 50.47(b) and 10 CFR 50, Appendix E, and the activity does not constitute a reduction in effectiveness or change in the current Emergency Action Level (EAL) scheme. Therefore, the activity can be implemented without prior NRC approval.	<input checked="" type="checkbox"/>	
b	The activity does not continue to comply with the requirements of 10 CFR 50.47(b) or 10 CFR 50 Appendix E or the activity does constitute a reduction in effectiveness or EAL scheme change. Therefore, the activity cannot be implemented without prior NRC approval.	<input type="checkbox"/>	
Part VII. Disposition of Proposed Change Requiring Prior NRC Approval			
Will the proposed change determined to require prior NRC approval be either revised or rejected?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
If No, then initiate a License Amendment Request in accordance 10 CFR 50.90, AD-LS-ALL-0002, Regulatory Correspondence, and AD-LS-ALL-0015, License Amendment Request and Changes to SLC, TRM, and TS Bases, and include the tracking number:_____.			

