

## **NRR-DRMAPEm Resource**

---

**From:** Lingam, Siva  
**Sent:** Tuesday, October 22, 2019 3:30 PM  
**To:** Michael.Dilorenzo@aps.com  
**Cc:** Dixon-Herrity, Jennifer; Wengert, Thomas; Anderson, Joseph; norris, michael; Hoffman, Raymond; thomas.n.weber@aps.com  
**Subject:** Palo Verde 1, 2, and 3 - Acceptance Review of LAR Associated with Changes to Emergency Plan Staffing Requirements (EPID L-2019-LLA-0222)

By letter dated October 18, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19291F735), Arizona Public Service Company (APS, the licensee) submitted a license amendment request (LAR) proposing changes to Emergency Plan staffing requirements for Palo Verde Nuclear Generating Station, Units 1, 2, and 3, and related Independent Spent Fuel Storage Installation (Palo Verde). The amendment would revise certain Emergency Response Organization (ERO) positions in the Palo Verde Emergency Plan. Specifically, the proposed changes would revise certain ERO positions in accordance with guidance specified in the "Alternative Guidance for Licensee Emergency Response Organizations," finalized in a letter from the U.S. Nuclear Regulatory Commission (NRC) to the Nuclear Energy Institute, dated June 12, 2018 (ADAMS Accession No. ML18022A352). Please note that the licensee is required to adhere to Title 10 of the *Code of Federal Regulations*, Part 50 (10 CFR 50), Paragraph 50.54(q), "Emergency Plans," when revising the ERO staffing plans.

The proposed changes will also relocate the non-minimum staff ERO personnel from the Palo Verde Emergency Plan to emergency preparedness implementing procedures.

The proposed changes have been reviewed considering the requirements of 10 CFR 50.47, "Emergency Plans," Paragraph (b), 10 CFR 50 Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," and other applicable emergency preparedness NRC guidance documents such as . These regulations establish emergency planning standards that require 1) adequate staffing; 2) satisfactory performance of key functional areas and critical tasks; and 3) timely augmentation of the response capability.

The purpose of this e-mail is to provide the results of the NRC staff's acceptance review for the above LAR. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed LAR in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 280 hours to complete. The NRC staff expects to complete this review approximately by October 31, 2020, or earlier. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager. These estimates are based on the NRC staff's initial review of the application and

they could change, due to several factors including requests for additional information, or unanticipated addition of scope to the review.

If you have any questions, please contact me at (301) 415-1564.

Siva P. Lingam  
U.S. Nuclear Regulatory Commission  
Project Manager  
Palo Verde Nuclear Generating Station, Units 1, 2, and 3  
Grand Gulf Nuclear Station  
Entergy Fleet  
Location: O-9E22; Mail Stop: O-9E03  
Telephone: 301-415-1564  
E-mail address: [Siva.Lingam@nrc.gov](mailto:Siva.Lingam@nrc.gov)

**Hearing Identifier:** NRR\_DRMA  
**Email Number:** 280

**Mail Envelope Properties** (SN6PR09MB276570A110664F7BF9727F24F6680)

**Subject:** Palo Verde 1, 2, and 3 - Acceptance Review of LAR Associated with Changes to  
Emergency Plan Staffing Requirements (EPID L-2019-LLA-0222)  
**Sent Date:** 10/22/2019 3:29:53 PM  
**Received Date:** 10/22/2019 3:29:00 PM  
**From:** Lingam, Siva

**Created By:** Siva.Lingam@nrc.gov

**Recipients:**

"Dixon-Herrity, Jennifer" <Jennifer.Dixon-Herrity@nrc.gov>  
Tracking Status: None  
"Wengert, Thomas" <Thomas.Wengert@nrc.gov>  
Tracking Status: None  
"Anderson, Joseph" <Joseph.Anderson@nrc.gov>  
Tracking Status: None  
"norris, michael" <Michael.Norris@nrc.gov>  
Tracking Status: None  
"Hoffman, Raymond" <Raymond.Hoffman@nrc.gov>  
Tracking Status: None  
"thomas.n.weber@aps.com" <thomas.n.weber@aps.com>  
Tracking Status: None  
"Michael.Dilorenzo@aps.com" <Michael.Dilorenzo@aps.com>  
Tracking Status: None

**Post Office:** SN6PR09MB2765.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	4302	10/22/2019 3:29:00 PM

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**