



Southern  
Nuclear

# SNC ERO Staffing LAR RAI responses

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# SNC's Approach

- Follow the basic template from NUREG 0654 Revised Table B-1 but use an SNC-specific strategy.
- Use improvements made at SNC sites including:
  - Comprehensive studies and extensive analysis of the emergency planning augmentation functions.
  - Advancements in technology, communications, training and procedures that improves the current augmentation support strategy and that were not available when the current Emergency Plan was approved.
- Justify where SNC's strategy differs from Revised Table B-1 though the use of certain more conservative SNC requirements and enhancements elsewhere in the staffing strategy.

## SNC's Approach (continued)

- Differences from the NRC generic guidance on augmentation are very minor. The overall ERO staffing strategy demonstrates compliance with the regulations.
- Upon approval of the LAR, SNC will execute an Implementation Plan for upgraded technology, training, qualifications, procedures, and drills in alignment with the changes that are approved.
- The three primary differences between SNC's plant specific strategy and the NRC generic guidance are discussed on the following 3 slides.

# Primary differences from NUREG 0654 R2

1. Emergency Director (ED) Augmentation Support
  - The SNC Shift Manager (SM) performs the ED functions for a maximum of the first 90 minutes, until they are relieved.
  - The SNC SM/ED is supported by on-shift SROs who are also qualified as EDs.
  - SNC EDs can be supported by a Corporate Nuclear Duty Officer and other SNC Operations Managers and Operations SMEs from early in the event. Using improvements in mobile communications and remote-working technologies, these resources can assist recovery efforts during the 90-minute period prior to relief.
  - Augmentation includes one ED in the TSC and one ED in the EOF - both from an Alert declaration.

## Primary differences (continued)

### 2. Technical/Maintenance Augmentation Support

- SNC EDs are experienced at directing technical and maintenance activities and perform similar duties every day.
- EDs can be supported by Engineering and Maintenance organizations SMEs from early in the event using improvements in mobile communications and remote-working technologies prior to arrival of Engineering and Maintenance Support.
- The SNC strategy is focused more on augmenting experienced technical support relevant to the event conditions and equipment failures instead of relying on the particular qualifications of an on-duty engineer, mechanic or electrician.
- The SNC strategy is supported by substantial evidence, including time/motion analysis, that demonstrates the on-shift technical and maintenance capabilities are suited for the work needed in the first 90 minutes.

## Primary differences (continued)

### 3. Radiation Protection Augmentation Support

- SNC EDs are experienced at directing RP technicians and perform similar duties every day. EDs and RP technicians are aided by new radiation monitoring and web-based technologies.
- Every SNC RP technician assigned to the on-shift staff is fully trained and qualified to perform the duties envisioned by the NRC's augmentation strategy in the generic guidance for the first 90 minutes.
- Minor changes in the strategy for how the 2 SNC on-shift RP technicians are employed allow for a slightly different approach. The 2 on-shift RP technicians are augmented by 7 RP technicians for a total of 9, which aligns with the total in the NRC generic guidance.
- Advancements in RP monitoring technologies, dose assessment, standard RWPs, and dosimetry justify the SNC staffing strategy.
- The SNC strategy is supported by substantial evidence, including time/motion analysis, that demonstrates that the two on-shift RP technicians are suited for the work needed in the first 90 minutes.

# Summary

In summary, SNC has proposed slight modifications to the NRC generic guidance that are consistent with the regulations.

The proposed LAR leverages the substantial improvements made since the Standard Plan was approved. In-depth analysis, numerous plant and technology improvements along with a complete rewrite of the E-Plan implementing procedures and training materials have vastly improved the effectiveness and efficiency of the stations.

SNC's pandemic workforce has demonstrated that remote support of the stations is very effective in quickly getting resources to the on-shift organization.