From: Lamb, John

Sent: Wednesday, February 17, 2021 6:09 PM

To: Lowery, Ken G.

**Cc:** Markley, Michael; Quichocho, Jessie; Anderson, Joseph; norris, michael;

Hoffman, Raymond; Williams, Shawn; Devlin-Gill, Stephanie

Subject: DRAFT - Info for Audit - SNC Fleet EP LAR

Importance: High

Ken,

Below is the DRAFT info that the NRC staff will need for the audit regarding the SNC Fleet EP LAR. The NRC staff will also need SNC's availability for the Audit. The NRC staff estimates that it will take 4 days.

Thanks.

John

The NRC staff needs the following information to support SNC's proposed ERO on-shift and augmentation changes:

- Provide information that supports the capability to provide timely augmentation to the Command and Control function.
  - Provide the qualification and training requirements for SNC's Shift Managers/Emergency Directors (ED) to implement SNC event response procedures. This information would include both the capabilities/responsibilities of a Shift Manager and of a ED. This information should provide an objective justification for the proposed changes to Shift Manager/ED ERO augmentation timing.
  - Provide information related to drills and/or exercises that were supported by only the Shift Manager for 75 minutes from the declaration of an Alert or greater emergency classification level (ECL) and for similar drills and/or exercises where an Emergency Director/Manager arrived before 75 minutes so that a direct comparison of emergency response can be made.
- Provide information that could be used by the NRC staff to determine how SNC licensed operators could concurrently meet the requirements of a licensed operator pursuant to 10 CFR 50.54(m)(2) and the Communications function as required by 10 CFR 50.47(b)(2).
  - Provide information related to drills and/or exercises that were supported by only licensed operators as on-shift communicators for 75 minutes from the declaration of an Alert or greater ECL and for similar drills and/or exercises where augmenting communicators arrived before 75 minutes so that a direct comparison of emergency response can be made.
  - Provide licensed operator initial and requalification evaluated scenarios where either the licensed or senior licensed operator performed their licensed operator responsibilities concurrently with performing the ERO communication function.
- Provide information that could be used by the NRC staff to determine how SNC licensed operators could concurrently implement event response procedures which would include emergency operating procedures, the emergency plan and related implementing procedures, and communication responsibilities while providing electrical and mechanical support for emergency core cooling system equipment, event mitigation, and equipment repair. Note: this information should address both maintenance technicians and maintenance supervisor capabilities.

- Procedures and related qualifications for SNC's version of Fix-It-Now (FIN) maintenance and its troubleshooting procedures.
- Evaluated scenarios where the SNC crew demonstrated the capabilities to perform troubleshooting, as prescribed in the SNC maintenance procedures, without assistance from the maintenance or engineering organizations.
- Provide information that could be used by the NRC staff to determine that the proposed increase in SNC ERO augmenting response time would not impact prescribed emergency preparedness key function of Engineering. Note: this information should include addressing the unique SNC shift technical advisor (STA) method of providing on-shift STA expertise and not an individual dedicated performing the STA function.
  - Provide information related to drills and/or exercises that were supported by only licensed operators as on-shift engineering staff for 75 minutes from the declaration of an Alert or greater ECL and for similar drills and/or exercises where engineering staff arrived before 75 minutes so that a direct comparison of emergency response can be made.
- Provide information that could be used by the NRC staff to determine that the proposed increase in SNC ERO augmenting response time would not impact prescribed emergency preparedness key function of Radiation Protection. Note: SNC includes field monitoring, supervision of radiation protection, and radiation protection actions in one Major Functional Area.
  - O Provide information related to drills and/or exercises that were supported by only the three Radiation Protection Technicians for 75 minutes from the declaration of an Alert or greater ECL and for similar drills and/or exercises where radiation protection support arrived before 75 minutes so that a direct comparison of emergency response can be made.
- Provide information that could be used by the NRC staff to determine that the proposed increase in SNC ERO augmenting response time would not impact prescribed emergency preparedness key function of Dose Assessment. Specifically, explain how the on-shift chemistry technician, or other trained individual, can provide equivalent dose assessment information as the augmenting ERO for an additional 15 minutes. Note: the augmenting ERO includes a RP Supervisor at the TSC and two Dose Assessment Supervisor & Analysts at the EOF which appear to have additional dose assessment capability.

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