

**From:** Brost, Wendy <webrost@STPEGS.COM>  
**Sent:** Thursday, April 22, 2021 9:48 AM  
**To:** Galvin, Dennis  
**Subject:** [External\_Sender] STP questions about EPlan Amendment SE  
**Attachments:** STP EPlan Amendment SE Questions.pdf

Good morning –

Attached is a short list of questions and requests for clarification related to the safety evaluation for the recently approved Emergency Plan amendment. Could you all please review them and let us know your thoughts?

- Wendy Brost  
Supervisor, STPNOC Licensing

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#	Safety Evaluation Statement	STP Written Submittal Statement	Comment
<b>Section 3.2.2: Emergency Response Organization</b> <b>Section 3.7.2 of Enclosure 1 of Original License Amendment Request</b>			
1.	<p>[Page 9 of SE] The proposed STPEGS Emergency Plan incorporates the current process for industrial complexes in or near Matagorda County to notify the county through the 911 call center of any release of chemical or other hazardous event and for Matagorda County to notify the licensee of the event.</p>	<p>[Page 33 of 44] Matagorda County has established agreements with industrial complexes in or near the county (including Lyondell Chemicals and OXEA Corporations) that they will notify the county through the 911 center of any release of chemical or other hazardous event that may affect areas outside the immediate area. The County will then notify all members of the Local Emergency Planning Committee of the event. STPNOC is a member of this planning committee.</p> <p>The current LOAs with these facilities stated that they would contact STP or attempt to contact them, if the facility had a release that potentially affected STP. The new process eliminates the need for a separate LOA between STP and these facilities.</p>	<p>Safety Evaluation statement is not in the plan. The site did not intend to have these details at the plan level, Matagorda County maintains the agreements with other industrial complexes in or near the county. STP is requesting clarification on whether the NRC intended for these details to be included in the STPEGS Emergency Plan and further clarification on what documents are "part of the Plan" or to have the sentence removed/changed. Proposed wording: "The current practice for industrial complexes in or near Matagorda County is to notify the county through the 911 call center of any release of chemical or other hazardous event and for Matagorda County to notify the licensee of the event. This practice is incorporated in Matagorda County Emergency Response processes."</p>
<b>Section 3.2.8: Emergency Facility and Equipment</b> <b>Section H.4 of Enclosure 2 of Original License Amendment Request</b>			
2.	<p>[Page 19 of SE] During a security-related event, or other event that precludes onsite access, the TSC and OSC ERO personnel will be directed to an alternate facility.</p>	<p>[Page 49 of 115] The Alternative Facility is located in the same building as the EOF.</p> <p>The Alternative Facility can communicate with the CRs, site security, and EOF. The functions of offsite notification and PARs will be performed from the EOF should the Alternative Facility be used. Engineering assessment activities including damage control team planning and preparation can be performed from the Alternative Facility.</p>	<p>STP requests clarification on the usage of "alternate facility." Does the Safety Evaluation mean an alternate facility as in the other units TSC/OSC or the Alternative Facility as described in H.4 of the new Emergency Plan?</p>

#	Safety Evaluation Statement	STP Written Submittal Statement	Comment
<b>Section 3.2.9: Accident Assessment</b> <b>Section I.4 of Enclosure 2 of Original License Amendment Request</b>			
3.	<p>[Page 20 of SE] The source term present in reactor coolant, containment atmosphere, and spent fuel pool area atmosphere are estimated using the listed inputs into the dose assessment and core damage assessment processes.</p>	<p>[Page 57 of 115] The source term present in reactor coolant, containment atmosphere, and spent fuel pool area atmosphere are estimated using the following potential inputs into the dose assessment and core damage assessment processes: effluent, process, and area radiation monitor readings; comparison of plant conditions against design basis event scenarios; sample analysis and environmental survey results; and plant parameter indications.</p>	<p>STP requests the information in the Safety Evaluation is corrected to “The source term present in reactor coolant, containment atmosphere, and spent fuel pool area atmosphere are used in the dose assessment and core damage assessment processes.”</p>
<b>Section 3.2.13: Recovery and Reentry</b> <b>Section M.1.a of Enclosure 2 of Original License Amendment Request</b>			
4.	<p>[Page 26 of SE] Upon termination of the emergency phase, and at the discretion of the Emergency Director following consultation with offsite authorities, the STP ERO will shift to the recovery organization.</p>	<p>[Page 75 of 115] When transition from an emergency to a recovery phase is necessary, the Emergency Director will designate a Recovery Manager and develop a recovery organization.</p>	<p>The Emergency Director consults with offsite agencies to terminate from a Site Area Emergency or General Emergency classification level, but not to shift from ERO to recovery organization. STP requests clarification or correction regarding this inconsistency.</p>