



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 16, 2021

Mr. Rod L. Penfield  
Site Vice President  
Energy Harbor Nuclear Corp.  
Perry Nuclear Power Plant  
P.O. Box 97, SB306  
Perry, OH 44081-0097

SUBJECT: PERRY NUCLEAR POWER PLANT, UNIT NO. 1 – ISSUANCE OF  
AMENDMENT NO. 196 REGARDING CHANGES TO THE EMERGENCY PLAN  
(EPID L-2020-LLA-0282)

Dear Mr. Penfield:

The U.S Nuclear Regulatory Commission (NRC, the Commission) has issued the enclosed Amendment No. 196 to Renewed Facility Operating License No. NPF-58 for Perry Nuclear Power Plant, Unit No. 1 (PNPP). The amendment consists of changes to the Emergency Plan in response to your application dated December 28, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20365A028), as supplemented by letter dated May 18, 2021 (ADAMS Accession No. ML21138A814). The amendment revises the PNPP Emergency Plan to eliminate on-shift staffing positions, increase emergency response facility (ERF) augmentation times, revise ERF staffing positions, revise facility position titles to be consistent with the Energy Harbor Nuclear Corp. fleet, and eliminate information from the emergency plan contained in implementing procedures and instructions.

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

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Scott P. Wall, Senior Project Manager  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-440

Enclosures:

1. Amendment No. 196 to NPF-58
2. Safety Evaluation

cc: Listserv



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NUCLEAR REGULATORY COMMISSION  
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ENERGY HARBOR NUCLEAR CORP.  
ENERGY HARBOR NUCLEAR GENERATION, LLC  
DOCKET NO. 50-440  
PERRY NUCLEAR POWER PLANT, UNIT NO. 1  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 196  
License No. NPF-58

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by Energy Harbor Nuclear Corp., et al.,<sup>1</sup> dated December 28, 2020, as supplemented by letter dated May 18, 2021, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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<sup>1</sup> Energy Harbor Nuclear Corp. is authorized to act as agent for Energy Harbor Nuclear Generation, LLC and has exclusive responsibility and control over the physical construction, operation, and maintenance of the facility.

2. Accordingly, by Amendment No. 196, Renewed Facility Operating License No. NPF-58 is hereby amended to authorize the revision to Perry Nuclear Power Plant Emergency Plan as set forth in application dated December 28, 2020, as supplemented by letter dated May 18, 2021, and as evaluated in the NRC staff's safety evaluation issued with this amendment.
3. This license amendment is effective as of its date of its issuance and shall be implemented within 180 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Andrea D. Veil, Director  
Office of Nuclear Reactor Regulation

Date of Issuance: November 16, 2021



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 196 TO

FACILITY OPERATING LICENSE NO. NPF-58

ENERGY HARBOR NUCLEAR CORP.

ENERGY HARBOR NUCLEAR GENERATION LLC

PERRY NUCLEAR POWER PLANT, UNIT NO. 1

DOCKET NO. 50-440

1.0 INTRODUCTION

By application dated December 28, 2020 (Reference 1) and as supplemented by letter dated May 18, 2021 (Reference 2), Energy Harbor Nuclear Corp. (Energy Harbor or the licensee) requested changes to the Perry Nuclear Power Plant (PNPP) Emergency Plan pursuant to Section 50.54(q)(2) of Title 10 of the *Code of Federal Regulations* (10 CFR). The proposed changes would revise the PNPP Emergency Plan to change the Emergency Response Organization (ERO) staffing composition and to increase the staff augmentation times from 30 minutes to 60 minutes and from 60 minutes to 90 minutes, for certain ERO positions from the time of declaration of an Alert or higher emergency classification level (ECL).

The proposed revisions include:

- Reassign responsibility for performance of on-shift dose assessment from the chemistry technician to the shift engineer/shift technical advisor (SE/STA);
- Extend augmented ERO response times from 30 and 60 minutes to 60 and 90 minutes of the declaration of an Alert or higher ECL, respectively;
- Eliminate the on-shift radwaste operator (RWO) and references to on-shift maintenance positions and functions;
- Establish facility activation criteria for the technical support center (TSC), operations support center (OSC) and emergency operations facility (EOF) and staffing of the joint information center (JIC) at the declaration of an Alert or higher classification;
- Separate command and control functions between the TSC and EOF to streamline augmented ERO staffing and reduce turnover of responsibilities during initial stages of the event;
- Eliminate references to specific fire protection response actions that are managed under the site fire protection plan, and

- Revise figures delineating positions associated with facility activation, allowing for the transfer of classification, state/local notification, dose assessment, protective action recommendation (PAR), and emergency exposure functions from the control room in advance of 60 minutes when minimum staff positions are met as defined in the proposed emergency plan.

The supplemental letter dated May 18, 2021, provided additional information that clarified the application but did not expand the scope of the application as originally noticed and, therefore, did not change the NRC staff's proposed no significant hazards consideration determination as published in the *Federal Register* on February 23, 2021 (86 FR 11009).

## 2.0 REGULATORY EVALUATION

The regulatory requirements and guidance on which the NRC staff based its review are provided below.

### 2.1 Regulatory Requirements

The planning standards in 10 CFR 50.47(b) establish the requirements that the onsite and offsite emergency response plans must meet for the NRC staff to make a finding that there is reasonable assurance that the licensee can, and will, take adequate protective measures in the event of a radiological emergency. Specifically, on-shift and augmented ERO staffing is addressed under 10 CFR 50.47(b)(2), which states:

On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and the interfaces among various onsite response activities and offsite support and response activities are specified.

In addition, Appendix E to 10 CFR Part 50, "Emergency Planning and Preparedness for Production and Utilization Facilities," Section IV, Part A, "Organization," states, in part:

The organization for coping with radiological emergencies shall be described, including definition of authorities, responsibilities, and duties of individuals assigned to the licensee's emergency organization....

### 2.2 Guidance

Regulatory Guide (RG) 1.101, Revision 2, "Emergency Planning and Preparedness for Nuclear Power Reactors," October 1981 (Reference 3), provides guidance on methods acceptable to the NRC staff for implementing the planning standards of 10 CFR 50.47(b)(1) and (2), and the requirements of Sections IV.A and IV.D of Appendix E to 10 CFR Part 50. Revision 2 of RG 1.101 endorses Revision 1 to NUREG-0654/FEMA-REP-1 [Federal Emergency Management Agency – Radiological Emergency Preparedness], "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980 (Reference 4), which provides acceptance criteria outlining an acceptable means for complying with the planning standards set forth in 10 CFR 50.47(b). These criteria provide a basis for NRC licensees, State, and local governments to develop acceptable radiological emergency plans.

In NUREG-0654, Section II, "Planning Standards and Evaluation Criteria," Evaluation Criteria II.B.1 and II.B.5 address planning standard 10 CFR 50.47(b)(2). Evaluation Criterion II.B.1 specifies the onsite emergency organization of plant staff personnel for all shifts, and its relation to the responsibilities and duties of the normal shift complement. In addition, Evaluation Criterion II.B.5, states, in part:

Each licensee shall specify the positions or title and major tasks to be performed by the persons to be assigned to the functional areas of emergency activity. For emergency situations, specific assignments shall be made for all shifts and for plant staff members, both onsite and away from the site. These assignments shall cover the emergency functions in Table B-1 entitled, "Minimum Staffing Requirements for Nuclear Power Plant Emergencies." The minimum on-shift staffing levels shall be as indicated in Table B-1. The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency. This capability shall be as indicated in Table B-1.

The NRC's Office of Nuclear Security and Incident Response (NSIR), Division of Preparedness and Response (DPR), Interim Staff Guidance (ISG), document – NSIR/DPR-ISG-01, "Emergency Planning for Nuclear Power Plants," November 2011 (Reference 5), provides updated guidance information to address emergency planning requirements for nuclear power plants. Specifically, NSIR/DPR-ISG-01 was developed to address the assignment of tasks or responsibilities to on-shift ERO personnel that would potentially overburden them and prevent the timely performance of their emergency plan functions. The ISG also endorsed the Nuclear Energy Institute (NEI) document NEI 10-05, Revision 0, "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities," June 2011 (Reference 6), which was developed to establish a standard methodology for licensees to conduct analyses of the ability of on-shift staff to perform all required functions and tasks necessary to respond to a declared emergency for an operating power reactor.

By letter dated June 12, 2018 (Reference 7), the NRC staff provided alternative guidance to Evaluation Criterion II.B.5 in NUREG-0654, Revision 1, for minimum ERO on-shift and augmentation staffing. The letter stated, in part:

The NRC has revised Section II.B, Table B-1 of NUREG-0654, based in part on comments received from the public on the draft Revision 2 of NUREG-0654, located at [www.regulations.gov](http://www.regulations.gov) under Docket ID FEMA-2012-0026. The revised ERO staffing guidance has been finalized, and the NRC will include it when the entire NUREG-0654, Revision 2, is ready for issuance. Until then, the NRC staff is making available on an interim basis the ERO on-shift and augmentation staffing plan (attached). Regardless of whether a licensee chooses to use the guidance contained in Revision 1 of NUREG-0654, the attached, or an alternative approach, licensees are still required to adhere to 10 CFR 50.54(q) when revising their ERO staffing plans.

Hereafter, Table B-1, "Emergency Response Organization (ERO) Staffing and Augmentation Plan," which is an attachment to the letter dated June 12, 2018, will be referred to as "Revised Table B-1" in this safety evaluation.

Energy Harbor states that a functional analysis of the augmented ERO positions based on the extended response times and completion of major tasks was performed as outlined in NUREG-0654, Revision 1 and the Revised Table B-1.

### 3.0 TECHNICAL EVALUATION

The NRC staff has reviewed the licensee's regulatory and technical analyses in support of the proposed changes to the PNPP Emergency Plan, as described in the application dated December 28, 2020, as supplemented by the letter dated May 18, 2021. The NRC staff's technical evaluation is detailed below.

#### 3.1 Enhancements

An evaluation of the proposed changes to the PPNP ERO based upon the applicable major functional areas as described in the Revised Table B-1 was performed. Many of the proposed changes are supported by enhancements to equipment (technology) and by procedural, training, and process improvements, as described below. Collectively, these enhancements compensate for the proposed increases in augmentation timing and the proposed reduction in available on-shift maintenance expertise.

##### *Plant Computer*

Energy Harbor states that the PNPP Plant Computer System was upgraded to an Integrated Computer System (ICS). The benefits of the ICS upgrade include:

- Improved plant monitoring capability for Emergency Director functions,
- Fewer keystrokes required to switch between graphical displays,
- Real time plant data available through graphical displays, and
- Real-time, read-only plant data available on any desktop computer throughout the corporate network.

Energy Harbor states that the ICS is a data-gathering, analysis, and display, system. It provides on-line monitoring of various inputs (digital, analog, and pulse) representing significant plant process variables. ICS then organizes and presents this data in a manner that provides users with easy access to the information they need to effectively operate the plant. The ICS can monitor systems throughout the plant and process, display, and log, this information.

##### *Dose Assessment*

Energy Harbor states that the PNPP dose assessment was originally performed utilizing a meteorological information and dose assessment system (MIDAS) software to receive data automatically from the meteorological tower and plant radiation monitors and provide two plume dispersion models: a straight-line gaussian model and a plume trajectory estimation model. The current dose assessment capability utilizes the unified RASCAL interface (URI) dose assessment software. The URI software package is installed and operated on designated processors located in the control room, TSC, and EOF. Inputs for meteorological data, plant vent flow, radiation monitor data, and other plant status indicators are taken from a group display that places all the necessary information in one location for ease of input. This method of dose assessment requires minimal user input and is simpler and less time consuming than the previous dose assessment method. Thus, enhancements in dose assessment software have reduced the time required to perform dose assessments and to provide the results to the Emergency Director.

### *Procedure Improvements*

Energy Harbor states that PNPP emergency action levels (EALs) now incorporate guidance that has simplified the emergency classification process, including the use of an overview matrix of EAL initiating conditions and threshold values, which streamlines the process of evaluating EALs against plant conditions. Additionally, emergency operating procedures (EOPs) have been vastly improved through internal operating experience and industry initiatives. EOPs now use a symptom-based approach that demands less assessment and interpretation of plant conditions by the operating crews. Overall, the improvements made to procedures greatly reduce the operator's reliance on the ERO during the initial phases of any event.

### *Training*

Energy Harbor states that training is used to strategically drive and sustain improved performance at PNPP. Training is administered through the application of a Systematic Approach to Training to ensure that all training is conducted to the industry-accepted standards required to achieve and maintain accreditation by the National Academy of Nuclear Training. The proficiency of the control room team is evaluated in the areas of critical task performance, prioritization of activities, communications, accident mitigation, event classification, teamwork, and communications. Improvements to equipment, procedures, and training that have occurred since initial approval of the PNPP emergency plan have resulted in a significant increase in the on-shift capabilities and knowledge. Based on these improvements, Energy Harbor concluded that there would be no significant degradation or loss of any functional capability as a result of the proposed changes in on-shift staff, augmentation times, facility activation criteria or re-alignment of augmented positions.

### 3.2 Major Functional Areas

In its application, Energy Harbor provided a justification for the proposed PNPP Emergency Plan changes that included a detailed review of each major functional area described in the Revised Table B-1.

The current PNPP Emergency Plan describes the ERO as consisting of personnel staffing in the following emergency response facilities:

- Control Room,
- OSC,
- TSC,
- EOF, and
- JIC

The current PNPP Emergency Plan activates the TSC and OSC at the declaration of an Alert or higher ECL and activates the EOF and JIC at the declaration of a Site Area Emergency or higher ECL. Energy Harbor proposes to activate the TSC, OSC and EOF within 60 minutes of declaring an Alert or higher ECL. Although activation of the EOF would not be required until the declaration of a Site Area Emergency or higher ECL is in effect per the guidance in the Revised Table B-1, the proposed ERO staffing changes to the PNPP Emergency Plan require the TSC, OSC and EOF emergency response facilities to activate at the declaration of an Alert or higher ECL.

The NRC staff's review of the proposed changes to the PNPP Emergency Plan is described below by major functional area.

### 3.2.1 Major Functional Area: Plant Operations and Assessment of Operational Aspects

Energy Harbor states that NUREG-0654, Revision 1, assumes the on-shift staff will perform plant operations and assessment of operational aspects functions throughout the emergency. The Revised Table B-1 replaced the plant operations and assessment of operational aspects major functional area with the emergency direction and control major functional area. The revision placed greater focus on performance of emergency preparedness functions performed by plant operations personnel.

Energy Harbor states that the staffing levels associated with plant operations are revised to reflect only those with positions performing emergency preparedness functions of classification, notification, protective actions/dose assessment, core damage assessment, and oversight of on-shift ERO in order to better align the PNPP Emergency Plan with the Revised Table B-1.

Energy Harbor further states that the proposed change was evaluated in accordance with 10 CFR Part 50, Appendix E, Section IV.A.9. The evaluation did not reveal any conflicting duties for on-shift personnel as a result of the proposed change and continues to meet NRC guidance.

The NRC staff finds the revision of the plant operations staffing to only reflect those with positions performing emergency preparedness functions is consistent the guidance in the Revised Table B-1 and is acceptable.

Based on an evaluation of the above changes, the NRC staff has determined that the proposed PNPP Emergency Plan will continue to meet the planning standard of 10 CFR 50.47(b)(2) and the requirements in Section IV.A of Appendix E to 10 CFR Part 50 regarding plant operations and assessment of operational aspects.

### 3.2.2 Major Functional Area: Emergency Direction and Control

The Revised Table B-1 recommends that the TSC should be staffed with an Emergency Coordinator to relieve the control room within 60 minutes following the declaration of an Alert or higher ECL. Additionally, the EOF Emergency Director position should be staffed within 60 minutes of the declaration of a Site Area Emergency or higher ECL to perform relief and assume the Emergency Direction and Control function from the TSC.

The current revision of the PNPP Emergency Plan provides for the performance of emergency direction and control functions in the TSC at 30 minutes following the declaration of an Alert or higher ECL and in the EOF at 60 minutes following the declaration of a Site Area Emergency or higher ECL. The proposed change extends the 30-minute response time for the Emergency Coordinator in the TSC to 60 minutes. The proposed change also includes activation of the TSC, OSC, and EOF within 60 minutes of an Alert or higher classification. The emergency direction and control functions of classification, Federal notification and emergency exposure authorization, would be transferred to the TSC Emergency Coordinator, and the functions of State/local notification and dose assessment/ PARs would be transferred to the EOF Emergency Director upon activation of these facilities.

The Table, “Transition of Command and Control Functions,” in Section 5.2.3, “Activation and Staffing,” in the proposed PNPP Emergency Plan illustrates the transfer of emergency direction and control functions by facility:

<b>CONTROL ROOM</b>	<b>TSC</b>	<b>EOF</b>
<b>SM [Shift Manager] / Emergency Coordinator</b>	<b>Emergency Coordinator</b>	<b>Emergency Director</b>
Classification ----->	Classification	
Notifications (State/local) ----->		Notifications (State/local)
Notifications (NRC) ----->	Notifications (NRC)	
PARs ----->		PARs
Emergency Exposure -----> Controls	Emergency Exposure Controls	

The NRC staff finds that the proposed 60-minute augmentation time from the declaration of an Alert or higher ECL to activate and staff the TSC Emergency Coordinator position is consistent with the guidance in the Revised Table B-1. The current timeframe for augmentation of the TSC Emergency Coordinator was more conservative than the time provided in NUREG-0654, Revision 1, as well as the Revised Table B-1. The basis for the extension to the other major functional area 30-minute response times also provides the basis for the extension in 30-minute response time for the emergency direction and control. The emergency direction and control burden for the Shift Manager/Emergency Coordinator is reduced due to the extension in augmentation times for the 30-minute ERO responders to within 60-minutes of the declaration of an Alert or higher ECL.

Based on an evaluation of the above changes, the NRC staff has determined that the proposed PNPP Emergency Plan will continue to meet the planning standard of 10 CFR 50.47(b)(2) and the requirements in Section IV.A of Appendix E to 10 CFR Part 50 regarding emergency direction and control.

### 3.2.3 Major Functional Area: Notification/Communication

The Revised Table B-1, recommends that the TSC will be staffed with two communicators within 60 minutes of the declaration of an Alert or higher ECL and an additional communicator, as needed, within 90 minutes. In addition, the Revised Table B-1 recommends the staffing of one communicator in the EOF within 60 minutes of the declaration of a Site Area Emergency or higher ECL.

The current PNPP Emergency Plan assigns one on-shift individual as an on-shift Communicator to perform the notification/communication function, and has one additional communicator in the TSC available within 30 minutes of declaring an Alert or higher ECL with another communicator available in the TSC within 60 minutes of declaring an Alert or higher ECL. It further provides for two additional communicators in the EOF within 60 minutes of declaring a Site Area Emergency or higher ECL.

Energy Harbor states that the proposed PNPP Emergency Plan maintains an on-shift individual as an on-shift Communicator to perform the notification/communication function. However, the proposed PNPP Emergency Plan eliminates the 30-minute augmented response position and

provides for augmenting the staffing the EOF State/local Communicator and TSC Emergency Notification System (ENS) Communicator within 60 minutes of a declaration of an Alert or higher ECL as provided in the Revised Table B-1. Energy Harbor states that the change supports the transition of the Federal notification function to the TSC and the State and local notification function to the EOF within 60-minutes of a declaration of an Alert or higher ECL.

The proposed PNPP Emergency Plan maintains an on-shift dedicated communicator, as well as an augmenting State/local Communicator in the EOF and adds an augmenting designated ENS Communicator in the TSC within 60 minutes of the declaration of an Alert or higher ECL, respectively.

The NRC staff finds the change in the augmentation times for the staffing of the State and local Communicator in the EOF to activate at the same time as the TSC (within 60 minutes of a declaration of an Alert or higher ECL) is more conservative and timely than what is provided in the Revised Table B-1. The designation of an augmenting ENS Communicator in the TSC and a State and local Communicator in the EOF meets the intent the guidance in the Revised Table B-1 for the notification/communication function and is acceptable.

Based on an evaluation of the above changes, the NRC staff has determined that the proposed PNPP Emergency Plan will continue to meet the planning standard of 10 CFR 50.47(b)(2) and the requirements in Section IV.A of Appendix E to 10 CFR Part 50 regarding the notification/communication function.

### 3.2.4 Major Functional Area: Radiological Accident Assessment and Support of Operational Accident Assessment

#### Offsite Dose Assessment

The Revised Table B-1 recommends that the TSC should be staffed with one Dose Assessment/Projection staff within 60 minutes following the declaration of an Alert or higher ECL. Additionally, the EOF should be staffed with one Dose Assessment/Projection staff within 60 minutes of the declaration of a Site Area Emergency or higher ECL.

The current PNPP Emergency Plan maintains an on-shift dose assessment by an on-shift chemistry technician. It further provides for augmentation of the dose assessment function within 30 minutes by the Radiation Protection Coordinator in the TSC and subsequently to the Offsite Radiation Advisor in the EOF upon activation of that facility.

Energy Harbor states that in the proposed PNPP Emergency Plan the responsibility for offsite dose assessment would be the responsibility of the on-shift STA. The proposed change is being made as a result of enhancements to computer systems, as well as improvements in the dose assessment software at the facility. These computer system and dose assessment software improvements allow for minimal user interface and streamlining of data such that the activities related to monitoring performance of core damage and dose assessment can be performed by a single position improving the efficiency for the performance of the tasks.

Energy Harbor further states that establishing a common activation timeframe for the TSC and EOF allows for simultaneous transfer of certain functions from the control room directly to the EOF. The Offsite Radiation Advisor position in the EOF will maintain responsibility for direction of offsite radiological monitoring teams, coordination of exchanges of offsite monitoring data and performance of dose assessment duties associated with establishing PARs as that function will

be performed solely by the EOF under the proposed change. Since the PAR function will no longer be performed in the TSC, there is no longer a need for the TSC Dose Assessor position in the ERO. As a result, the Dose Assessor position in the TSC will be eliminated. Additionally, the EOF Offsite Radiation Advisor position will be renamed "Dose Assessment Coordinator."

The NRC staff finds the change in the augmentation times for the staffing of the EOF to activate at the same time as the TSC (within 60 minutes of a declaration of an Alert or higher ECL is more conservative and timely than what is provided in the Revised Table B-1. The augmentation of Dose Assessment Coordinator in the EOF and elimination of the Dose Assessor position in the TSC meets the intent the guidance in the Revised Table B-1 for the offsite dose assessment function and is acceptable.

Based on an evaluation of the above changes, the NRC staff has determined that the proposed PNPP Emergency Plan will continue to meet the planning standard 10 CFR 50.47(b)(2) and the requirements of Section IV.A to Appendix E of 10 CFR Part 50 regarding the offsite dose assessment function.

#### Offsite Surveys

The Revised Table B-1, recommends one onsite Field Monitoring Team (FMT) and one offsite FMT within 60 minutes of the declaration of an Alert or higher ECL. In addition, the Revised Table B-1 recommends one offsite FMT within 90 minutes of the declaration of an Alert or higher ECL.

The current PNPP Emergency Plan assigns two Radiation Monitoring Teams (renamed to FMTs in the proposed PNPP Emergency Plan) at the Alert or higher classification, with a 30-minute augmentation response requirement. The teams are comprised of one leader and one helper.

Energy Harbor states that in the proposed PNPP Emergency Plan, the dispatch of two FMTs continues to occur at declaration of an Alert or higher classification; however, response times are extended from 30 minutes to 60 and 90 minutes for each FMT, respectively. FMT response involves primarily environmental radiation and contamination assessments which would provide for the tracking of the plume from any potential radiological release. The actions were explained by Energy Harbor as driving to and from field positions, reading dose rate instrumentation, and communicating results to the TSC and EOF. The first FMT would be augmented at 60 minutes and would track any potential plume at the early stages of an event, while the second team, augmented in 90 minutes, would support continued plume tracking capability while in parallel do any necessary sampling activities.

Energy Harbor further states that oversight and direction of the FMTs is provided by the FMT coordinator in the EOF. This position maintains responsibility for radiological safety of the FMTs.

The NRC staff finds the augmentation of two FMTs within 60 and 90 minutes of an Alert of higher ECL, respectively, supports the applicable PAR decision-makers in developing effective PARs and is consistent with the guidance provided in the Revised Table B-1.

Based on an evaluation of the above changes, the NRC staff has determined that the proposed PNPP Emergency Plan will continue to meet the planning standard 10 CFR 50.47(b)(2) and the requirements of Section IV.A to Appendix E of 10 CFR Part 50 regarding the offsite survey function.

### Onsite (out-of-plant) and In-Plant Surveys

The Revised Table B-1 recommends one Radiation Protection (RP) or Health Physics (HP) technician (for the purposes of this safety evaluation, RP and HP are interchangeable) per unit for a multi-unit site and three additional RP technicians within 60 minutes and three additional RP technicians within 90 minutes of an Alert or higher classification, respectively.

The current PNPP Emergency Plan has one HP technician on-shift to perform onsite surveys with one HP technician responding within 30 minutes and one additional HP technician responding within 60 minutes of declaring an Alert or higher ECL.

Energy Harbor states that the proposed PNPP Emergency Plan provides for one on-shift RP technician with one RP technician responding within 60 minutes and one RP technician responding within 90 minutes to perform onsite (out-of-plant) and in-plant surveys. The improvements in the plant computer systems, as it relates to the availability of plant data and trending analyses, has been extended to data associated with area radiation and plant process monitoring. The decision to provide RP coverage may be based on plant radiological conditions as indicated by installed area radiation monitors (ARMs) and the process radiation monitoring system (PRMS). During the initial stages of an accident, not all areas of the plant would be affected by releases of radioactive materials. Therefore, RP coverage would not be required for all areas. If RP coverage is deemed necessary, emergency teams can be covered by the on-shift and augmenting RP technicians. In addition, installed ARMs, which alarm locally and remotely at preset dose rates, are located throughout the plant.

The NRC staff finds that the improvements in plant computer systems supports the augmentation of one RP technician within 60 minutes and one RP technician within 90 minutes of an Alert or higher ECL, respectively, and is consistent with the guidance provided in the Revised Table B-1.

Based on an evaluation of the above changes, the NRC staff has determined that the proposed PNPP Emergency Plan will continue to meet the planning standard 10 CFR 50.47(b)(2) and the requirements of Section IV.A to Appendix E of 10 CFR Part 50 regarding the onsite (out-of-plant) and in-plant surveys function.

### Chemistry/Radiochemistry

The chemistry/radiochemistry task was included under the Radiological Assessment function in NUREG-0654, Revision 1), but is not included in the Revised Table B-1 because it is no longer needed as the need for immediate reactor coolant sampling has been reduced due to the variety of plant indications of fuel damage available to the licensee.

The current PNPP Emergency Plan identifies the chemistry/radiochemistry tasks as being performed by the on-shift chemistry technician. This position is augmented by another chemistry technician with a response time of 60 minutes.

The proposed PNPP Emergency Plan revision eliminates the requirement for performance of the chemistry/radiochemistry function on-shift as well as augmented staffing for performance of this function. Performance of chemistry/radiochemistry is being removed from the PNPP Emergency Plan and will be maintained in accordance with site technical specifications.

As specified in the Revised Table B-1, the chemistry/radiochemistry function is no longer needed as the need for immediate reactor sampling has been reduced due to the variety of plant indications of fuel damage available to plant personnel.

The NRC staff finds the revision to remove the chemistry/radiochemistry function is consistent with the guidance in the Revised Table B-1 and is acceptable.

Based on an evaluation of the above changes, the NRC staff has determined that the proposed PNPP Emergency Plan continues to meet the planning standard 10 CFR 50.47(b)(2) and the requirements of Section IV.A to Appendix E of 10 CFR Part 50 regarding the chemistry/radiochemistry function.

### 3.2.5 Major Functional Area: Plant System Engineering, Repair, and Corrective Actions

#### Technical Support

The Revised Table B-1 identifies one on-shift Core/Thermal Hydraulics Engineer (typically filled by the STA), one Core/Thermal Hydraulics Engineer, one Electrical/Instrument and Controls (I&C) Engineer and one Mechanical Engineer to be available within 60 minutes of the declaration of an Alert or higher ECL, respectively.

The current PNPP Emergency Plan identifies an on-shift STA with a Plant Technical Engineer and Core/Thermal Engineer augmenting within 30 minutes of the declaration of an Alert or higher ECL, and a Mechanical Engineer and Electrical Engineer augmenting within 60 minutes of the declaration of an Alert or higher ECL.

The proposed PNPP Emergency Plan maintains the on-shift responsibility for performance of technical support activities as well as the 60-minute augmented response by the Electrical and Mechanical Engineers but extends the response time for the Core/Thermal Hydraulics Engineer from 30 to 60 minutes of the declaration of an Alert or higher ECL and the response time for the Plant Technical Engineer from 30 to 90 minutes of the declaration of an Alert or higher ECL.

Energy Harbor states that the PNPP core damage assessment process uses a combination of clad failure, and drywell and containment radiation readings to determine core status. This data is readily available for viewing and trending in the control room utilizing the plant process computer (PPC) in order to assist in rapidly assessing core conditions. The PNPP dose assessment software also uses these data in the development of dose assessment and dose projection activities.

Energy Harbor further states that the user-friendly displays and interfaces have been developed to increase the number of plant parameters that can be accessed through both the plant computer system and business network. These plant parameter displays also include real time data updates. Added programming capability for critical parameter indications and the ability to switch between graphical displays have also contributed to the STA's improved ability to monitor plant functions. Extending the response time for the core hydraulic engineer to 60 minutes and the plant technical engineer to 90 minutes of the declaration of an Alert or higher ECL respectively, does not adversely impact the technical support major task.

The NRC staff finds that due to the enhancements identified in Section 3.1 above, the revision in augmentation times for the Core/Thermal Hydraulics Engineer from 30 to 60 minutes of the declaration of an Alert or higher ECL and the response time for the Plant Technical Engineer

from 30 to 90 minutes of the declaration of an Alert or higher ECL are consistent the guidance in the Revised Table B-1 and are acceptable.

Based on an evaluation of the above changes, the NRC staff has determined that the proposed PNPP Emergency Plan continues to meet planning standard 10 CFR 50.47(b)(2) and the requirements of Section IV.A to Appendix E of 10 CFR Part 50 regarding the technical support function.

Repair and Corrective Actions

The Revised Table B-1 specifies that the following maintenance personnel should respond to the OSC to support Repair Team activities:

- One electrician and one mechanic within 60 minutes of the declaration of an Alert or higher ECL to provide support for emergency core cooling system equipment (ECCS), event mitigation, and equipment repair.
- One I&C technician within 90 minutes of the declaration of an Alert or higher ECL to provide assistance with logic manipulation, support for event mitigation and equipment repair, and support of digital I&C, if applicable.

The current PNPP Emergency Plan specifies that the repair and corrective actions function is performed on-shift by operations personnel, including a radwaste operator (as an ancillary duty), as well as an I&C technician. These positions were augmented by the Mechanical Maintenance Coordinator in the TSC and the OSC Coordinator within 30 minutes of the declaration of an Alert or higher ECL, and the Maintenance Mechanical Supervisor, Maintenance Electrical Supervisor and I&C Supervisor within 60 minutes of the declaration of an Alert or higher ECL, respectively. Additionally, a title change was made to replace the RP Supervisor position with a HP Coordinator.

The proposed PNPP Emergency Plan would eliminate the on-shift repair team staffing and extend the response times for following OSC augmented resources to the times as indicated in the table below:

<b>Position Title/Expertise</b>	<b>60-Minute Augmentation</b>	<b>90-Minute Augmentation</b>
OSC Coordinator	1	Not Applicable (N/A)
HP Coordinator	1	N/A
Mechanical Personnel	1	N/A
Electrical Personnel	1	N/A
Mechanical Maintenance Coordinator	N/A	1
Electrical Maintenance Coordinator	N/A	1
I&C Coordinator	N/A	1
I&C Personnel	N/A	1

Energy Harbor states that with respect to the removal of the RWO, during the completion of the on-shift staffing analysis, it was noted that there were no actions requiring response by the RWO for the first 90 minutes after event classification. Radiological waste processing would be performed by the RWO as part of its normal duties. The RWO is not required to operate or support maintenance of radwaste equipment in the PNPP EOPs, off normal operating

instructions, emergency implementing procedures, or severe accident management guidelines. As a result, the proposed change to remove the RWO from the proposed PNPP Emergency Plan would not result in a reduction of event response capability.

The NRC staff finds the availability of on-shift operators with the knowledge, skills, and abilities to perform all tasks that may be required to implement the PNPP abnormal operating procedures and emergency operating procedures, the redundant and diverse emergency core cooling system design, and the proposed augmenting maintenance personnel are consistent with the guidance in the Revised Table B-1 and are acceptable.

Based on an evaluation of the above changes, the NRC staff has determined that the proposed PNPP Emergency Plan continues to meet planning standard 10 CFR 50.47(b)(2) and the requirements of Section IV.A to Appendix E of 10 CFR Part 50 regarding the repair and corrective action function.

### 3.2.6 Major Functional Area: Protective Actions (In-Plant)

The Revised Table B-1 recommends one RP per unit for a multi-unit site and three additional RP technicians within 60 minutes and three additional RP technicians within 90 minutes of an Alert or higher classification, respectively.

The purpose of the RP function is to: (1) provide qualified RP coverage for responders accessing potentially unknown radiological environments during emergency conditions; (2) provide in-plant surveys, and (3) control dosimetry and Radiologically Controlled Area access.

The current PNPP Emergency Plan identifies the performance of the protective action functions as a duty of one of the two on-shift HP technicians and provides for augmentation by two HP technicians within 30 minutes and two HP technicians within 60 minutes from the declaration of an Alert or higher ECL.

The proposed PNPP Emergency plan maintains the second on-shift RP technician for performance of the protective actions (in-plant) function. The proposed PNPP Emergency plan changes the augmentation for one HP technician at 30 minutes to two RP technicians at 60 minutes from the declaration of an Alert or higher ECL. The proposed PNPP Emergency plan further changes the augmentation for one HP technician at 60 minutes to two RP technicians at 90 minutes from the declaration of an Alert or higher ECL. These RP technician positions will continue to perform activities related to:

- Access Control/Dosimetry,
- Job coverage for repair and corrective actions, and
- Personnel monitoring

Energy Harbor states that issuance of electronic dosimeters, which are obtained prior to entry into radiologically controlled areas, would not require oversight by a RP technician. In addition to providing dose information, electronic dosimeter systems are used by personnel as a key to unlock turnstiles to allow access to a radiologically controlled area. Electronic area radiation monitoring provides updated real time information for limited areas that allows one RP technician to remotely monitor numerous locations. An extension of the response time for the RP personnel responsible for personnel monitoring/habitability coincides with the 60-minute

activation time for emergency response facilities as described in the proposed PNPP Emergency Plan.

The NRC staff finds the improved use of technology regarding access control and electronic area radiation monitoring, and the staffing of two on-shift RP technicians, two RP technicians augmenting in 60 minutes, and two RP technicians augmenting in 90 minutes will not result in a loss of function or impact to the timing of the performance of protective actions and are consistent the guidance in the Revised Table B-1 and are acceptable.

Based on an evaluation of the above changes, the NRC staff has determined that the proposed PNPP Emergency Plan continues to meet planning standard 10 CFR 50.47(b)(2) and the requirements of Section IV.A to Appendix E of 10 CFR Part 50 regarding the protective actions (in-plant) function.

### 3.2.7 Major Functional Area: Firefighting

The Firefighting function was included in NUREG-0654, Revision 1, but is not included in the Revised Table B-1.

The current PNPP Emergency Plan states that the responsibility for performance of rescue and first aid tasks is assigned to the fire brigade as an ancillary duty.

Energy Harbor states that the proposed PNPP Emergency Plan removes firefighting from the PNPP Emergency Plan Table 5.1, "Perry Plant Emergency Response Organization Functions and Shift Staff Augmentation Plan," and provides that the PNPP firefighting function will be maintained as part of the Fire Protection Plan.

Because Energy Harbor would continue to provide firefighting in accordance with applicable programs and is consistent with the Revised Table B-1 guidance, the NRC staff finds the proposed removal of the firefighting function from the proposed PNPP Emergency Plan is acceptable.

Based on an evaluation of the above changes, the NRC staff has determined that the proposed PNPP Emergency Plan continues to meet planning standard 10 CFR 50.47(b)(2) and the requirements of Section IV.A to Appendix E of 10 CFR Part 50 regarding the firefighting function.

### 3.2.8 Major Functional Area: Rescue Operations and First-Aid

The Rescue Operations and First Aid functions were included in NUREG-0654, Revision 1, but are not included in the Revised Table B-1.

The current PNPP Emergency Plan states that the responsibility for performance of rescue and first aid tasks is assigned to the fire brigade as an ancillary duty.

Energy harbor is not proposing a change to the rescue operations and first-aid functional area at the PNPP site. However, the proposed PNPP Emergency plan removes rescue operations and first aid references from the PNPP Emergency Plan Table 5.1, "Perry Plant Emergency Response Organization Functions and Shift Staff Augmentation Plan," and will provide details related to those functions as part of the update of the Fire Protection Plan.

Because Energy Harbor would continue to provide rescue operations and first-aid in accordance

with applicable programs and is consistent with the Revised Table B-1 guidance, the NRC staff finds the proposed removal of the rescue operations and first-aid functions from the proposed PNPP Emergency Plan is acceptable.

Based on an evaluation of the above changes, the NRC staff has determined that the proposed PNPP Emergency Plan continues to meet the planning standard 10 CFR 50.47(b)(2) and the requirements in Section IV.A to Appendix E of 10 CFR Part 50 regarding the rescue operations and first-aid functions.

### 3.2.9 Major Functional Area: Site Access Control and Personnel Accountability

The Site Access Control and Personnel Accountability functions were included in NUREG-0654, Revision 1, but are not included in the Revised Table B-1.

The current PNPP Emergency Plan provides a note stating that on-shift Nuclear Security Personnel are staffed per the Security Plan and refers to having one on-shift secondary alarm station (SAS) operator.

Energy Harbor states that the proposed PNPP Emergency Plan removes the reference of having one on-shift SAS operator from the PNPP Emergency Plan Table 5.1, "Perry Plant Emergency Response Organization Functions and Shift Staff Augmentation Plan," but continues to specify that Security Personnel per the Security Plan will perform tasks associated with site access and personnel accountability. As such, PNPP is not proposing a change to the use of on-shift Security personnel in the Security Plan.

Because Energy Harbor would continue to provide site access control and personnel accountability in accordance with applicable programs and is consistent with the Revised Table B-1 guidance, the NRC staff finds the proposed removal of the site access control and personnel accountability functions from the proposed PNPP Emergency Plan is acceptable.

Based on an evaluation of the above changes, the NRC staff has determined that the proposed PNPP Emergency Plan continues to meet the planning standard 10 CFR 50.47(b)(2) and the requirements in Section IV.A to Appendix E of 10 CFR Part 50 regarding the site access control and personnel accountability functions.

### 3.3 ERO Change Summary

Energy Harbor provided a summary and evaluation of changes to the augmenting ERO by facility. The tables below illustrate these changes:

<b>EOF Position Changes</b>		
<b>Current Position</b>	<b>Proposed Position</b>	<b>Change</b>
Emergency Coordinator	Emergency Director	Title change only
Environmental Liaison	FMT Coordinator	Title change only
Radiation Monitoring Teams	Field Monitoring Teams	Title change only
Offsite Radiation Advisor	Dose Assessment Coordinator	Title change only
Regulatory Affairs Coordinator	Offsite Agency Liaison	Title change only

<b>EOF Position Changes</b>		
<b>Current Position</b>	<b>Proposed Position</b>	<b>Change</b>
Plant Operations Advisor	N/A	<i>Deleted position</i>
Communicators	Operations Communicator	Title change – position specific
Communicators	Health Physics Network Communicator	Title change – position specific
Communicators	State/local Communicator	Title change – position specific

Energy Harbor states that the change to remove the Plant Operations Advisor is acceptable due to the establishment of a common activation timeframe and classification level for the TSC and EOF. This provides for the separation of response activities associated with onsite response in the TSC from those associated with offsite agency support in the EOF. As a result, the Plant Operations Advisor position is no longer needed in the EOF. This function will be performed by the Operations Coordinator, formerly titled the Operations Advisor, in the TSC.

<b>TSC Position Changes</b>		
<b>Current Position</b>	<b>Proposed Position</b>	<b>Change</b>
Operations Manager	Emergency Coordinator	Title change only
Plant Technical Engineer	Engineering Coordinator	Title change only
TSC Operations Advisor	TSC Operations Coordinator	Title change only
Radiological Controls Coordinator	Radiation Protection Coordinator	Title change only
Administrative Assistant	TSC Manager	Title change only
	ENS Communicator	New position
	Operations Communicator	New position
Radiation Monitoring Teams		Positions relocated to EOF
Dose Assessor		<i>Deleted position</i>
Radiation Protection Assistant		<i>Deleted position</i>
Regulatory Information Liaison		<i>Deleted position</i>

Energy Harbor states that the elimination of the Dose Assessor and Radiation Protection Assistant positions in the TSC is acceptable due to the establishment of a common activation timeframe and classification level for the TSC and EOF. This alignment allows for reduction in duplicative staffing positions.

Energy Harbor further states that the elimination of the Information Liaison in the TSC together with the establishment of a common activation timeframe and classification level for the EOF and JIC facilitates the communication of information needed to develop materials for issuance to the media and general public. As a result, the Public Information Response Team (PIRT) is no longer needed. With the deletion of the PIRT, there is no longer a need to maintain an ERO position responsible for facilitation of information from this organization.

<b>JIC Position Changes</b>		
<b>Current Position</b>	<b>Proposed Position</b>	<b>Change</b>
Support Services Supervisor	Logistics Coordinator	Title change only
Media Relations Supervisor	Media Relations Coordinator	Title change only
Information Supervisor	Information Coordinator	Title change only
	Technical Advisor	New position
	Nuclear Communications Coordinator	New position
	Company Spokesperson	New position
Rumor Control Staff	Media Monitor / Rumor Control	<i>Position change</i>
Technical Spokesperson		<i>Deleted position</i>

Energy Harbor states that replacing the Rumor Control Staff with Media Monitor/Rumor Control position is acceptable because improvements in JIC processes including the use of social media and internet capability for response to requests from the public allow for combining of media monitoring and rumor control functions. Using available internet resources, the Media Monitor/Rumor Control position is able to monitor social and news media and report rumors to JIC Management.

Energy Harbor further states that for the elimination of Technical Spokesperson position is acceptable because the proposed change eliminates the Technical Spokesperson from the JIC staff. Under the proposed change, the Nuclear Communications Coordinator is responsible for developing news announcements and the Company Spokesperson discusses technical information during media briefings.

The NRC staff reviewed the respective facilities' ERO task disposition and assessment for positions removed from the proposed PNPP Emergency Plan and finds the changes proposed for the TSC, EOF and JIC are acceptable.

Based on the above evaluations for each function, the NRC staff determined that the proposed PNPP Emergency Plan continues to meet the planning standard 10 CFR 50.47(b)(2) and the requirements in Section IV.A to Appendix E of 10 CFR Part 50.

### 3.4 Summary

Based on a technical and regulatory review of the proposed changes to the PNPP Emergency Plan, the NRC staff finds that the proposed PNPP Emergency Plan, as changed, continues to meet planning standard 10 CFR 50.47(b)(2) and the requirements of Section IV.A to Appendix E of 10 CFR Part 50 and provides reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. Therefore, the NRC staff concludes that the proposed PNPP Emergency Plan changes to certain ERO staffing and augmentation times, as described in the application dated December 28, 2020, as supplemented by letter dated May 18, 2021, are acceptable.

#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the State of Ohio official was notified of the proposed issuance of the amendment on September 27, 2021. The State official had no comments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

The amendments change the site emergency plan. The amendments relate, in part, to changes in recordkeeping, reporting, or administrative procedures or requirements. The amendments also relate, in part, to changing requirements with respect to the installation or use of facility components located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, published in the *Federal Register* on February 23, 2021 (86 FR 11009) and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

#### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

#### 7.0 REFERENCES

1. Energy Harbor letter to U.S. Nuclear Regulatory Commission, "Perry Nuclear Power Plant, Emergency Plan Amendment Request," dated December 28, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20365A028).
2. Energy Harbor letter to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information regarding a License Amendment Request that revises the Perry Nuclear Power Plant Emergency Plan (EPID No. L-2020-LLA-0282)," dated May 18, 2021 (ADAMS Accession No. ML21138A814).
3. Regulatory Guide 1.101, Revision 2, "Emergency Planning and Preparedness for Nuclear Power Reactors," dated October 1981 (ADAMS Accession No. ML090440294).
4. NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," dated November 1980 (ADAMS Accession No. ML040420012).

5. U.S. Nuclear Regulatory Commission, NSIR/DPR-ISG-01, "Interim Staff Guidance-Emergency Planning for Nuclear Power Plants," dated November 20, 2011 (ADAMS Accession No. ML113010523).
6. NEI 10-05, Revision 0, "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities," dated June 2011 (ADAMS Accession No. ML111751698).
7. Kahler, R., U.S. Nuclear Regulatory Commission, letter to Susan Perkins-Grew, Nuclear Energy Institute, "Alternative Guidance for Licensee Emergency Response Organizations," dated June 12, 2018 (ADAMS Accession No. ML18022A352).

Principal Contributor: E. Robinson, NSIR

Date of issuance: November 16, 2021

SUBJECT: PERRY NUCLEAR POWER PLANT, UNIT NO. 1 – ISSUANCE OF AMENDMENT NO. 196 REGARDING CHANGES TO THE EMERGENCY PLAN (EPID L-2020-LLA-0282) DATED NOVEMBER 16, 2021

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**\*via memo**

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