

Issues noted with Fleet and V3&4 SERs

1) Section 3.1 and 3.1.12 - Both SERs

Section 3.1, last paragraph states:

“Although no specific augmentation time is provided for the JIC, SNC stated that it would continue to have the capability for the disseminating of media information within 60 minutes of an Alert or higher ECL.”

Additionally, Section 3.1.12 states the following:

“The Public Information Director (PID) would be available and be capable of disseminating information to the media within 60 minutes of a declaration of an Alert or higher ECL.”

“SNC states that a joint information system approach is currently used at SNC. The Public Information Director (PID) would be available and be capable of disseminating information to the media within 60 minutes of a declaration of an Alert or higher ECL.”

“SNC will continue to have a PID be available who is capable of disseminating information to the media within 60 minutes of a declaration of an Alert or higher ECL. The licensee is not proposing a change to this capability.”

“The proposed SNC SEP would clearly identify the JIC organization and SNC stated that the PID would continue to be available to disseminate information to the media with 60 minutes of a declaration of an Alert or higher ECL.”

“Because SNC is not proposing a change to their existing capability to provide a PID who is capable of disseminating information to the media within 60 minutes of a declaration of an Alert or higher ECL, extending the augmentation time of the News Writer to within 90 minutes of a declaration of an Alert or higher ECL does not impact the timing or capability to provide the media information. SNC will continue to have the capability to provide the media information within 60 minutes.”

Issue:

Section 3.1 and 3.1.12 contain statements that do not represent the current or proposed SNC approach to media inquiries and dissemination of information.

Revised Table B-1 states that “JIC/JIS staff to address media inquiries” are required within 60 minutes of an Alert or higher ECL. SNC maintains and staffs a 24 hour media inquiry line that satisfies this requirement.

Revised Table B-1 states that “Staff to perform JIC/JIS related tasks” are required within 60 minutes of a Site Area or higher ECL. This includes the dissemination of information to the media. SNC meets this requirement with the EOF New Writer, who responds within 75 minutes of an Alert or higher ECL.

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Action Needed: Discuss issue with NRC, no changes to the current SNC approach of receiving media inquiries or disseminating information is requested.

Suggest the following language for section 3.1:

“The proposed SNC SEP would maintain the requirement to activate the EOF within 75 minutes of an Alert or higher emergency classification level (ECL) and would revise the time to activate the TSC and OSC from within 75 minutes to within 90 minutes of an Alert or higher ECL. Although no specific augmentation time is provided for the JIC, SNC stated that it would continue to have the capability for the disseminating of media information within 75 minutes of an Alert or higher ECL.”

Suggest the following language for section 3.1.12:

“The purpose of the providing information to the media function is to manage and coordinate information related to the event.

The Revised Table B-1 recommends that JIC staff address media inquiries within 60 minutes of the declaration of an Alert or higher ECL but notes that this function does not need to be performed at the TSC or OSC. The Revised Table B-1 further recommends additional staff to perform JIC-related tasks within 60 minutes of the declaration of a Site Area Emergency or higher ECL. For the JIC, the Revised Table B-1 notes: “Emergency response facility activation timing is not the concern; it is whether the facility staff is performing the stated function(s) within the time specified.” The Revised Table B-1 does not specify an on-shift capability and does not identify specific staff positions for the minimum staff.

The current SNC Standard Emergency Plan has a News Writer to respond to the EOF within 75 minutes of a declaration of an Alert or higher ECL. SNC states that a joint information center / joint information system approach is currently used at SNC. A designated individual would be available and be capable of disseminating information to the media within 75 minutes of a declaration of an Alert or higher ECL.

Currently, the SNC SEP identifies the following minimum staffing positions that report to the JIC following the decision to staff the JIC:

- *PID*
- *JIC Manager*
- *Public Response Coordinator*
- *Facility Coordinator*
- *Media Relations Representative*

The following positions reporting to the JIC are not identified as minimum staffing positions:

- *Nuclear Spokesperson*
- *Technical Assistant*
- *JIC Assistant*
- *Public Response Staff*
- *Clerical Staff*
- *Security*

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No specific response time is currently designated for these JIC positions.

In its letter dated June 30, 2020, as supplemented by letters dated August 11 and November 20, 2020, and April 27, 2021, SNC proposed to extend the augmentation time of the News Writer to within 90 minutes of a declaration of an Alert or higher ECL, eliminate the identification of JIC minimum staffing positions, remove JIC minimum positions in Table 1 [ERO Augmented Responder Table] of the SNC SEP, and remove Clerical Staff from the JIC organization. An NRC staff assessment of these changes is as follows:

- SNC will continue to have a **designated individual** available who is capable of disseminating information to the media within **75 minutes** of a declaration of an Alert or higher ECL. The licensee is not proposing a change to this capability.
- SNC would remove the Media Response Functional Area from Table 4, "JIC Staff." Table 4 stated that the JIC staff does not have a 75 minute Augmentation Time and the proposed SNC SEP will continue to identify the JIC organization on Figure B.3.2.A, "Joint Information Center Organization." This change is administrative and does not impact the timing or capability to provide the media information.
- The proposed SNC SEP would remove designations for certain Table B.3.2.A positions as minimum staff. The proposed SNC SEP would clearly identify the JIC organization and SNC stated that a **designated individual** would continue to be available to disseminate information to the media with **75 minutes** of a declaration of an Alert or higher ECL. This change is administrative and does not impact the timing or capability to provide the media information.
- The SNC SEP ERO staffing changes include removing administrative support staff who do not perform emergency plan functions. For the JIC organization, Table B.3.2.A identifies these administrative staff positions as clerical staff. Because clerical staff/administrative support positions do not perform emergency plan functions, this change does not impact the timing or capability to provide the media information.
- ~~Because SNC is not proposing a change to their existing capability to provide a designated individual who is capable of disseminating information to the media within 75 minutes of a declaration of an Alert or higher ECL, extending the augmentation time of the News Writer to within 90 minutes of a declaration of an Alert or higher ECL does not impact the timing or capability to provide the media information. SNC will continue to have the capability to provide the media information within 60 minutes. As such, the NRC staff finds the proposed change to the News Writer augmentation time are acceptable.~~ (No change to EOF News Writer augmentation time is now requested since EOF augmentation time is remaining at 75 minutes of an Alert or higher ECL.)

Based on the above, the NRC staff concludes that the proposed SNC SEP will continue to meet the planning standard of 10 CFR 50.47(b)(2) and the requirements of Appendix E to 10 CFR Part 50, Section IV.A for media information."

Issues noted with Fleet and V3&4 SERs

2) Section 3.1.1 - Fleet SER only

Regarding current SNC staffing, the Fleet SER (ML21217A091) states in 2nd paragraph:

*“The first difference is that the TSC Emergency Director would relieve the on-shift shift manager **within 90 minutes of a declaration of an Alert or higher ECL** while the Revised Table B-1 provides for TSC staffing within 60 minutes of a declaration of an Alert or higher ECL.”*

Similar language does not appear in the V3&4 SER (ML21217A028). The V3&4 SER states:

*“The second difference is that the TSC Emergency Director would relieve the on-shift shift manager **within 75 minutes of Alert or higher ECL** while the Revised Table B-1 provides for TSC staffing within 60 minutes of an Alert or higher ECL.”*

Issue: 75 minutes is the current SNC staffing time for the TSC. 90 minutes is the proposed staffing for the TSC. The V3&4 SER states this correctly, although it is listed as the “second difference” from Revised Table B-1.

Action Needed: Verify NRC understanding of issue, request correction to state what the current SNC staffing timing is.

Issues noted with Fleet and V3&4 SERs

3) Section 3.1.1 - Fleet SER only

Fleet SER (ML21217A091) - Bottom of 3rd paragraph states, "Because the SNC EOF Emergency Director would provide augmentation and relief for Emergency Director responsibilities and the responsibility for EAL classifications, it would not be expected to place an undue burden on the on-shift Shift Manager/Emergency Director."

V3&4 SER (ML21217A028) - Bottom of 3rd paragraph states, "Because the SNC EOF Emergency Director would provide augmentation and relief for Shift Manager/Emergency Director responsibilities and the responsibility for EAL classifications would not place an undue burden on the on-shift Shift Manager/Emergency Director, the NRC staff finds the proposed changes to the Command and Control function acceptable."

Issue: The two SERs differ slightly in wording and meaning.

The Fleet SER states that the EOF Emergency Director takes responsibility for EAL classifications, which is not currently done and is not proposed.

The V3&4 SER states that because the EOF ED provides augmentation and relief for SM/ED responsibilities, the SM/ED can maintain EAL classifications without excessive other burdens.

The V3&4 SER wording describes the current and proposed approach SNC takes. The EOF Emergency Director does not take the responsibility for EAL classifications from the site SM/ED.

Action Needed: Verify NRC understanding of issue, request the Fleet SER be modified to use similar wording as the V3&4 SER.

Issues noted with Fleet and V3&4 SERs

4) Section 3.1.2 - Fleet SER only

Fleet SER (ML21217A091) - 3rd paragraph states:

"In its letter dated June 30, 2020, as supplemented by letters dated August 11 and November 20, 2020, SNC proposed to extend the TSC response time from the current 75 minutes to 90 minutes from a declaration of an Alert or higher ECL and EOF staffing of one communicator within 60 minutes of a declaration of an SAE or higher ECL."

V3&4 SER (ML21217A028) states:

"In a letter dated June 30, 2020, as supplemented by letters dated August 11, 2020 and November 20, 2020, SNC proposed to extend the TSC and EOF response time from the current 75 minutes to 90 minutes from an Alert or higher ECL."

Issue: SNC did not intend to propose EOF staffing of one communicator within 60 minutes of a declaration of a SAE or higher ECL. It appears to be the recommended staffing per Revised Table B-1. Similar language does not appear in the V3&4 SER (ML21217A028).

Per the August 11, 2020, Supplement 1 (ML20224A464), page 10:

"Within 90 minutes of an Alert or higher, SNC provides relief for the two dedicated on-shift Communicators in the TSC and the EOF." (NOTE: This EOF response time was later changed back to 75 minutes based on the communication in Supplement 2.)

Per the April 27, 2021, Supplement 2 (ML21117A351):

"SNC proposes to maintain the facility activation requirement within 75 minutes from declaration of an Alert or higher classification for the EOF. One position in the EOF, the emergency notification network (ENN) Communicator, is dedicated to the state and local off-site response organizations (OROs). A second communicator in the EOF, the emergency notification system (ENS) Communicator, is dedicated to the NRC open-line. The EOF ENN Communicator relieves the on-shift ERO personnel of both completion of the ENN form and communications with the OROs. The EOF ENS communicator can relieve the on-shift ERO personnel of both completion of the NRC form 361 and communications with the NRC."

Action Needed: Verify NRC understanding of issue, request the Fleet SER be modified to use similar wording as the V3&4 SER.

Issues noted with Fleet and V3&4 SERs

5) Section 3.1.4 - Both SERs

2nd paragraph states, "The first difference is that SNC currently has a RP/Chemistry Group Lead respond to the OSC to perform within 75 minutes of the declaration of an Alert or higher ECL, while the Revised Table B-1 provides for one RP Coordinator within 60 minutes of a declaration of an Alert or higher ECL, and an additional RP Manager respond to the EOF **within 90 minutes** of a Site Area Emergency or higher ECL."

Issue: Revised Table B.1 does not require the EOF RP Manager in 90 minutes. It should be 60 minutes.

Action Needed: Discuss with NRC, verify common understanding and correct if needed.

Issues noted with Fleet and V3&4 SERs

6) Section 3.1.5 - Both SERs

2nd paragraph states, "The first difference is that the current SNC ERO Dose Assessment augmentation is within 75 minutes of the declaration of an Alert or higher ECL, while the Revised Table B-1 provides one Dose Assessment/Projection Staff individual within 60 minutes of a declaration of an Alert or higher ECL, and an additional Dose Assessment/Projection Staff individual **within 90 minutes** of a declaration of an Alert or higher ECL."

Issue: Revised Table B.1 does not require the additional Dose Assessment/Projection Staff in 90 minutes. It should be 60 minutes.

Action Needed: Discuss with NRC, verify common understanding and correct if needed.