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10 CFR 50.54(q)

United States Nuclear Regulatory Commission (NRC)  
ATTN: Document Control Desk  
Washington, DC 20555-0001

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-325 AND 50-324  
RENEWED LICENSE NOS. DPR-71 AND DPR-62

CATAWBA NUCLEAR STATION, UNIT NOS. 1 AND 2  
RENEWED FACILITY OPERATING LICENSE NOS. NPF-35 AND NPF-52  
DOCKET NOS. 50-413 AND 50-414

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1  
DOCKET NO. 50-400 / RENEWED LICENSE NO. NPF-63

MCGUIRE NUCLEAR STATION, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-369, 50-370 / RENEWED LICENSE NOS. NPF-9 AND NPF-17

OCONEE NUCLEAR STATION, UNIT NOS. 1, 2 AND 3  
DOCKET NOS. 50-269, 50-270, AND 50-287 / RENEWED LICENSE NOS. DPR-38, DPR-47,  
AND DPR-55

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261 / RENEWED LICENSE NO. DPR-23

**SUBJECT: Duke Energy Common Emergency Plan and Brunswick Steam Electric  
Plant and Catawba Nuclear Station Emergency Plan Annexes, Revision 1  
Summary of Changes**

**REFERENCE:**

1. NRC Letter, "*Catawba Nuclear Station, Units 1 and 2; McGuire Nuclear Station, Units 1 and 2; Oconee Nuclear Station, Units 1, 2, and 3; Brunswick Steam Electric Plant, Units 1 and 2; Shearon Harris Nuclear Power Plant, Unit 1; and H. B. Robinson Steam Electric Plant, Unit No. 2 – Issuance of Amendments for Common Emergency Plan Consistent with NUREG-0654, Revision 2 (EPID L-2020-LLA-0198)*", Agencywide Documents Access and Management System (ADAMS) Accession No. ML21155A213, Dated August 26, 2021

Ladies and Gentlemen:

In accordance with 10 CFR 50.54(q), Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively referred to as Duke Energy) is submitting a revision summary for the Duke

Energy Common Emergency Plan (EP-ALL-EPLAN, Revision 1), as well as revision summaries for the Emergency Plan Annexes for the Brunswick Steam Electric Plant (BNP) and the Catawba Nuclear Station (CNS) (EP-BNP-EPLAN-ANNEX, Revision 1, and EP-CNS-EPLAN-ANNEX, Revision 1, respectively).

EP-ALL-EPLAN, Duke Energy Common Emergency Plan, is the Emergency Plan utilized by the Duke Energy Nuclear Fleet, as approved by the NRC in Reference 1. The Common Emergency Plan is being revised to update the format, correct procedure references, and issue other minor conforming changes. These minor conforming changes include adding certain attachments and appendices to the Table of Contents, correcting terms and definitions for clarity, and additional clarifications to ensure alignment between various parts of the Emergency Plan.

EP-BNP-EPLAN-ANNEX, Duke Energy Brunswick Emergency Plan Annex and EP-CNS-EPLAN-ANNEX, Duke Energy Catawba Emergency Plan Annex, are the BNP and CNS specific compliments to the Duke Energy Common Emergency Plan. The Annexes have been revised from Revision 0 to update the format and correct procedure references.

The Duke Energy Common Emergency Plan License Amendment (Reference 1) was implemented at BNP and CNS on October 4, 2021. The remaining Duke Energy sites will implement the original License Amendment and subsequent revision described in Attachment 1 in accordance with the implementation schedule as described in Reference 1.

In accordance with 10 CFR 50.54(q)(5), Attachments 1, 2, and 3 include a summary of analyses associated with the emergency plan changes.

This document contains no new regulatory commitments.

Should you have any questions concerning this letter, or require additional information, please contact Lee Grzeck, Fleet Licensing Manager (Acting), at (980) 373-1530.

Sincerely,



M. Christopher Nolan  
Vice President – Nuclear Regulatory Affairs, Policy & Emergency Preparedness

Attachment 1: EP-ALL-EPLAN, Revision 1 10 CFR 50.54(q)

Attachment 2: EP-BNP-EPLAN-ANNEX, Revision 1 10 CFR 50.54(q)

Attachment 3: EP-CNS-EPLAN-ANNEX, Revision 1 10 CFR 50.54(q)

cc: L. Dudes, Regional Administrator USNRC Region II  
G. Smith, USNRC Senior Resident Inspector – BNP  
J. D. Austin, USNRC Senior Resident Inspector – CNS  
J. Zeiler, USNRC Senior Resident Inspector – HNP  
G. A. Hutto, USNRC Senior Resident Inspector – MNS  
J. Nadel, USNRC Senior Resident Inspector – ONS  
M. Fannon, USNRC Senior Resident Inspector – RNP  
A. Hon, NRR Project Manager – BNP  
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M. Mahoney, NRR Project Manager – HNP  
J. Klos, NRR Project Manager – MNS  
S. A. Williams, NRR Project Manager – ONS  
T. E. Hood, NRR Project Manager – RNP

**Attachment 1: EP-ALL-EPLAN, Revision 1 10 CFR 50.54(q)**

**<< 10 CFR 50.54(q) Review Form >>**

<b>Section I: 10 CFR 50.54(q) Review Number: (REG #):</b>				<b>2397671</b>	
<b>Applicable Sites and Applicability Determination # (5AD)</b>					
<b>■ BNP</b>	2397661	<b>■ CNS</b>	2397662	<b>■ HNP</b>	2397663
<b>■ MNS</b>	2397664	<b>■ ONS</b>	2397665	<b>■ RNP</b>	2397666
<b>Document #, EC #, or N/A</b>	<b>Revision # or N/A</b>	<b>Document or Activity Title</b>			
EP-ALL-EPLAN	001	Duke Energy Common Emergency Plan			

**Section II: Identify/Describe All Proposed Activities/Changes being Reviewed**

Event or action, or series of actions that may result in a change to the emergency plan or affect the implementation of the emergency plan (Use attachments, or continue additional pages as necessary): Continue to **Section III**.

EP-ALL-EPLAN, Duke Energy Common Emergency Plan, is the Emergency Plan utilized by the Duke Energy Nuclear Fleet. The Common Emergency Plan is being revised to update format, correct procedure references and minor changes found in the review and implementation of revision 0.

<b>Change #</b>	<b>Section or Step #</b>	<b>Change From</b>	<b>Change to</b>
1	Throughout	Old revision number, table of contents, Old header and footer, page numbers.	New revision number, updated table of contents, added revision summary, and page numbers as a result of the changes to the procedure. Procedure format was updated to align with Duke Energy Standard Procedure Automation System (PAS)
2	Throughout	Revision 0 grammar issues found in review.	Revision 1 Updated grammar issues found in review (added or removed commas, removed extra spaces, and periods, hyphens where needed).
3	Table of Contents	Added to document	<b>ATTACHMENTS</b> 1 Table B-1 - Emergency Response Organization (ERO) Staffing and Augmentation Plan. 2 Site-Specific Emergency Plan Annexes and Extension Documents 3 Procedures Required to Maintain the Emergency Plan 4 Appendix 1 - Definitions 5 Appendix 2 - Abbreviations and Acronyms 6 Appendix 3 - Cross References to 10 CFR 50 Appendix E.IV - Content of Emergency Plans

Change #	Section or Step #	Change From	Change to
4	Section 1 Introduction, third paragraph	The Duke Energy Common Emergency Plan was developed with the guidance of NUREG-0654, FEMA-REP-1, Revision 2, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." The Duke Energy Emergency Plan meets the emergency planning standards of 10 CFR 50.47(b), the requirements of Appendix E. <b>Section II of the Duke Energy Emergency Plan is organized using the structure of NUREG-0654, Revision 2. That structure provides the cross-reference to the elements in the base document.</b>	The Duke Energy Common Emergency Plan was developed with the guidance of NUREG-0654, FEMA-REP-1, Revision 2, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." The Duke Energy Emergency Plan meets the emergency planning standards of 10 CFR 50.47(b), the requirements of Appendix E.
5	Section 1 Introduction, Last Paragraph	<b>Section II</b> of the Duke Energy Common Emergency Plan provides specific guidance how the Emergency Plan meets each planning standard of 10 CFR 50.47(b), the requirements of 10 CFR 50 Appendix E and elements from NUREG 0654."	<b>Section 3.0 through Section 18.0</b> of the Duke Energy Common Emergency Plan provides specific guidance how the Emergency Plan meets each planning standard of 10 CFR 50.47(b), the requirements of 10 CFR 50 Appendix E and elements from NUREG-0654.
6	Section 2 Planning Standards and Elements	Added to document	Section 3.0 through Section 18.0 of the Duke Energy Emergency Plan is organized using the structure of NUREG-0654, Revision 2. That structure provides the cross reference to the elements in the base document.
7	Section B.1.a.5.a and Attachment 1 Table B-1	Public Information Officer - JIS	Public Information Officer (PIO) - JIS
8	Section B.1.a.5.b and Attachment 1 Table B-1	Public Information Liaison - EOF	EOF Technical Liaison - JIS
9	Section B, Element B.3, Table B-1	Refer to Table B-1 for the Duke Energy on-shift and augmenting ERO staffing plan  Table B-1 Removed from section	Refer to <b>Attachment 1, Table B-1 - Emergency Response Organization (ERO) Staffing and Augmentation Plan for the Duke Energy</b> on-shift and augmenting ERO staffing plan.  Table B-1 Moved to Attachment 1

Change #	Section or Step #	Change From	Change to
10	Section C, Element C.1 Section H, Element H.3, first paragraph, Section I.5, Element I.5	The Duke Energy EOF.....  Or  ....the Duke Energy EOF....	The Duke Energy <b>Common</b> EOF.....  Or  ....the Duke Energy <b>Common</b> EOF
11	Section D, Table D.3.1, Under Unusual Event	Added to Document	<b>[1]</b> and <b>[Note 1]</b> added to delineate note "1"
12	Section G, Element G.2, second to last paragraph	News releases are designed to be a written confirmation of the event and are public information. The coordination and sharing of news releases occurs via the JIS, or within a JIC when activated. Duke Energy news releases are approved by the company spokesperson or the EOF director/assistant director if the company spokesperson is not available. Once approved and shared within the JIS/JIC, they are distributed to the media.	News releases are designed to be a written confirmation of the event and are public information. The coordination and sharing of news releases occurs via the JIS, or within a JIC when activated. Duke Energy news releases are approved by the company spokesperson or the EOF director/ <del>assistant director</del> if the company spokesperson is not available. Once approved and shared within the JIS/JIC, they are distributed to the media.
13	Section H, Element H.10, second paragraph	Refer to element H.8 for a description of the offsite meteorological monitoring capabilities. Site meteorological information is available directly in the MCR and is provided to the TSC and EOF using EP-NET.	Refer to element H.8 for a description of the offsite meteorological monitoring capabilities. Site meteorological information is available directly in the MCR and is provided to the TSC and EOF using <b>facility computer and display systems (i.e. Emergency Preparedness Network (EP-NET), Operator Aid Computer (OAC) etc.)</b> .
14	Section H, Element H.13	<b>Duke Energy EOF is</b> the primary <b>location</b> for receipt and analysis of field monitoring team environmental sample data. The EOF Radiological Assessment Manager will be responsible for the coordination efforts. Sampling and analysis equipment are available (see element H.8) for quantitative activity determination of liquid and air samples, and qualitative activity determination of terrestrial samples.	<b>The Duke Energy Common EOF has</b> the primary <b>responsibility for coordination of</b> receipt and analysis of field monitoring team environmental sample data. The EOF Radiological Assessment Manager will be responsible for the coordination efforts. Sampling and analysis equipment are available (see element H.8) for quantitative activity determination of liquid and air samples, and qualitative activity determination of terrestrial samples.

Change #	Section or Step #	Change From	Change to
15	Section I, Element I.1.c, first 2 paragraphs	<p>On-site (inside the <b>owner controlled area (OCA)</b>) out of plant environmental monitoring is performed by <b>site radiation protection personnel</b> under the direction of OSC RP Supervisor or TSC RP Manager ERO positions.</p> <p>Off-site (outside the <b>OCA</b>) environmental monitoring is performed by qualified field monitoring team personnel under the direction of the EOF Field Monitoring Coordinator (or EOF Radiological Assessment Manager, if the EOF Field Monitoring Coordinator is not available).</p>	<p>On-site (inside the <b>protected area</b>) out of plant environmental monitoring is performed by <b>a qualified field monitoring technician</b> under the direction of OSC RP Supervisor or TSC RP Manager ERO positions.</p> <p>Off-site (outside the <b>protected area</b>) environmental monitoring is performed by qualified field monitoring team personnel under the direction of the EOF Field Monitoring Coordinator (or EOF Radiological Assessment Manager, if the EOF Field Monitoring Coordinator is not available).</p>
16	Section I, Element I.1.c, last paragraph	<p>Field monitoring teams are provided dedicated vehicles <b>and</b> equipment. Field monitoring surveys and sampling may be performed at pre-identified locations or other geographic locations within the EPZ determined during the event. Field monitoring teams are directed to track a radioactive plume by monitoring radiation levels and by obtaining and analyzing air samples. Samples taken by the off-site monitoring teams will be evaluated further by one of the available laboratory facilities described in elements C.4 and H.8.</p>	<p><b>With the exception of the on-site field monitoring technician</b>, field monitoring teams are provided dedicated vehicles. <b>Field monitoring teams and technicians are</b> provided equipment. Field monitoring surveys and sampling may be performed at pre-identified locations or other geographic locations within the EPZ determined during the event. Field monitoring teams are directed to track a radioactive plume by monitoring radiation levels and by obtaining and analyzing air samples. Samples taken by the off-site monitoring teams will be evaluated further by one of the available laboratory facilities described in elements C.4 and H.8.</p>
17	Section N, Element N.1.a, 4th paragraph	<p>If the emergency plan is not satisfactorily tested during the biennial exercise, such that NRC, in consultation with FEMA, cannot (1) find reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency or (2) determine that the ERO has maintained key skills specific to emergency response. Remedial exercises and drills are not required when performance issues are identified in non-biennial exercises, although identified issues will be documented for appropriate action within the CAP.</p>	<p>If the emergency plan is not satisfactorily tested during the biennial exercise, such that NRC, in consultation with FEMA, cannot (1) find reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency or (2) determine that the ERO has maintained key skills specific to emergency response, <b>then a remedial exercise may be requested</b>. Remedial exercises and drills are not required when performance issues are identified in non-biennial exercises, although identified issues will be documented for appropriate action within the CAP.</p>



Change #	Section or Step #	Change From	Change to
18	Section N Element N.3, 4th and 5th bullets	Onsite Radiological Data - A section for area radiation maps and display system snapshots, if warranted by the scenario events.  Offsite Radiological and Meteorological Data - A section for onsite and offsite maps and data tables, if warranted by the scenario events.	Onsite Radiological Data - A section for area radiation maps, onsite maps, data tables and display system snapshots, if warranted by the scenario events.  Offsite Radiological and Meteorological Data - A section for offsite maps and data tables, if warranted by the scenario events.
19	Section N, Element N.3.f	The <b>corporate</b> EOF.....	The <b>Duke Energy Common</b> EOF....
20	Section N, Element N.4, last bullet	the Duke Energy <b>Charlotte</b> EOF.....	the Duke Energy <b>Common</b> EOF....
21	Section P, Element P.6, 1st paragraph	Table P.6-1 provides a listing of annexes and emergency plan extension documents (documents that are considered part of the emergency plan but are maintained separately).  Moved table P6-1 to Attachment 2	Attachment 2, Site-Specific Emergency Plan Annexes and Extension Documents, provides a listing of annexes and emergency plan extension documents (documents that are considered part of the emergency plan but are maintained separately).
22	Section P, Element P.7, 1st Paragraph	Table P.7-1 provides a listing by title of the fleet procedures required to maintain and implement the emergency plan and the section(s) of the emergency plan to be implemented by each procedure. Site specific procedures are listed in the appropriate site specific annex to the Duke Energy Common Emergency Plan.  Moved Table P.7-1 to Attachment 3	Attachment 3, Procedures Required to Maintain the Emergency Plan, provides a listing by title of the fleet procedures required to maintain and implement the emergency plan and the section(s) of the emergency plan to be implemented by each procedure. Site specific procedures are listed in the appropriate site-specific annex to the Duke Energy Common Emergency Plan.
23	Old Table P.6-1, New attachment 2	Revision 0 procedure numbers and titles	Revision 1 procedure numbers and titles See mark up in E-folder of this assignment
24	Old Table P.7-1, New attachment 3	Revision 0 procedure numbers and titles	Revision 1 procedure numbers and titles added AD-EP-ALL-0112, AD-EP-ALL-0305, AD-EP-ALL-0407, and AD-SY-ALL-0208 to the attachment and removed TE-EP-ALL-0407 and TE-EP-ALL-0408 as they were superseded by AD-EP-ALL-0407 Added G to AD-EP-ALL-1000 See mark up in E-folder of this assignment
25	Old section III Appendices, Appendix 1 Definitions, New Attachment 4, Appendix 1 Definitions	Added new attachment	Attachment 4, Appendix 1 - Definitions

<b>Change #</b>	<b>Section or Step #</b>	<b>Change From</b>	<b>Change to</b>
26	Old Section III Appendix 2, New Attachment 5 Appendix 2	Abbreviations and Acronyms listed	Abbreviations and Acronyms placed in a table.
27	Old Section III Appendix 3, New Attachment 6 Appendix 3	Cross References to 10 CFR 50 Appendix E.IV - Content of Emergency Plans listed	Cross References to 10 CFR 50 Appendix E.IV - Content of Emergency Plans, and formatted in a table

**Section III: Description and Review of Licensing Basis Affected by the Proposed activity or Change:**

List all emergency plan sections that were reviewed for this activity by number and title.

IF THE ACTIVITY IN ITS ENTIRETY IS AN EMERGENCY PLAN CHANGE, EAL CHANGE OR EAL BASIS CHANGE, Enter Licensing Basis affected by the change and continue to **Section VI**.

**Licensing Basis**

- EP-ALL-EPLAN, Duke Energy Common Emergency Plan, Revision 0
- EP-BNP-EPLAN-ANNEX, Duke Energy Brunswick Emergency Plan Annex, Revision 0
- EP-CNS-EPLAN-ANNEX, Duke Energy Catawba Emergency Plan Annex, Revision 0
- EP-HNP-EPLAN-ANNEX, Duke Energy Harris Emergency Plan Annex, Revision 0
- EP-MNS-EPLAN-ANNEX, Duke Energy McGuire Emergency Plan Annex, Revision 0
- EP-ONS-EPLAN-ANNEX, Duke Energy Oconee Emergency Plan Annex, Revision 0
- EP-RNP-EPLAN-ANNEX, Duke Energy Robinson Emergency Plan Annex, Revision 0

<b>Section IV: Ability to Maintain the Emergency Plan.</b> <b>Answer the following questions related to impact on the ability to maintain the Emergency Plan. Continue to Section V.</b>	
1. Do any of the elements of the proposed activity change information or intent contained in the Emergency Plan?	Yes <input type="checkbox"/> No <input type="checkbox"/>
2. Do any elements of the proposed activity change an Initiating Condition (IC), Emergency Action Level (EAL), associated EAL note or basis, including underlying calculation or basis?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Attachment 3, 10 CFR 50.54(q) Initiating Condition (IC) and Emergency Action Level (EAL) and EAL Bases Validation and Verification (V&V) Form, is required to be completed as part of this review if "Yes" is selected above in question 2.	
3. Do any elements of the proposed activity change the process or capability for alerting or notifying the public as described in the FEMA-approved Alert and Notification System Design Report?	Yes <input type="checkbox"/> No <input type="checkbox"/>
4. Do any elements of the proposed activity change the Evacuation Time Estimate results?	Yes <input type="checkbox"/> No <input type="checkbox"/>
5. Do any elements of the proposed activity change the On-Shift Staffing Analysis results?	Yes <input type="checkbox"/> No <input type="checkbox"/>
6. Does the Proposed activity require a change to the Emergency Plan Programmatic Description?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>If Question 6 was answered yes, and the document being reviewed is NOT the Emergency Plan, then exit this review until the Emergency Plan change is complete or the proposed change is modified to not change the Emergency Plan Programmatic Description.</b>	
<b>Section IV</b> conclusion: <input type="checkbox"/> If questions 1-6 in <b>Section IV</b> marked NO, then complete <b>Section V</b> . <input type="checkbox"/> If any question 1-6 of <b>Section IV</b> marked yes, then continue at <b>Section VI</b> .	

<b>Section V: Maintaining the Emergency Plan Conclusion.</b>	
The questions in <b>Section IV</b> do not represent the total of all conditions that may cause a change to or impact the ability to maintain the emergency plan. Originator and reviewer signatures in <b>Section XIV</b> document that a review of all elements of the proposed change have been considered for their impact on the ability to maintain the emergency plan and their potential to change the emergency plan.	
<ol style="list-style-type: none"> <li>1. Provide a brief conclusion below that describes how the conditions, as described in the emergency plan, are maintained with this activity.</li> <li>2. Select the box below when the review completes all actions for all elements of the activity and no 10CFR50.54 screening or evaluation is required for any element. Continue to <b>Section XIV</b>.</li> </ol>	
<input type="checkbox"/> I have completed a review of this activity in accordance with 10CFR50.54(q)(2) and determined that the effectiveness of the emergency plan is maintained. This activity does not make any changes to the emergency plan. No further actions are required to screen or evaluate this activity in accordance with 10CFR50.54(q)(3).	

Conclusion:

<b>Section VI: Activity Previously Reviewed?</b>		
<b>Is this activity fully bounded by an NRC approved 10CFR50.90 submittal or Alert and Notification System Design Report?</b>		
<input type="checkbox"/>	Yes	10 CFR 50.54(q) Evaluation is not required. Identify bounding source document below and continue to <b>Section XIV</b> .
<input checked="" type="checkbox"/>	No	Continue to <b>Section VII</b> .
<input type="checkbox"/>	Partially	If <b>PARTIALLY</b> , identify bounding source document and list changes bounded by the approved 10 CFR 50.90 or Alert and Notification System Design Report below.  Changes not bound by the approved 10 CFR 50.90 or Alert and Notification System Design Report (i.e., part requiring further review). Continue the review in <b>Section VII</b> .

<b>Section VII: Editorial Changes</b>		
<input type="checkbox"/>	Yes	All Activities/Changes identified in <b>Section II</b> are editorial/typographical changes such as formatting, paragraph numbering, spelling, or punctuation that does not change intent.
<input type="checkbox"/>	No	None of the Activities/Changes listed in <b>Section II</b> are editorial/typographical changes. Continue to <b>Section VIII</b> .
<input checked="" type="checkbox"/>	Partially	Some Activities/Changes are editorial/typographical.
<p>If <b>Yes</b> is checked, Identify the activities/changes listed in <b>Section II</b> that are editorial/typographical changes and provide justification below. Continue to <b>Section XIV</b>.</p> <p>If <b>Partially</b> is checked, Identify the activities/changes listed in <b>Section II</b> that are editorial/typographical changes and provide justification below. Continue to <b>Section VIII</b> for changes not identified as editorial.</p>		

Justification:

The change(s) below are defined as editorial in accordance with AD-EP-ALL-0602, and do not change the intent of the emergency plan as written.

Proposed change 1, updates procedure format to align with the Procedure Automated System (PAS) formatting. This Duke Energy Standard formatting includes updates on the cover page, document number, table of contents, adds a revision summary, revises section spacing and page alignment, removes the previous revisions header and footer and replaces those with a PAS standard header to each page, updates the revision number throughout the document. Hyperlinks were added to some licensing documents directing the user to the latest version of the linked document in Fusion. These format changes do not change intent of the Emergency Plan.

Proposed change 2 revises grammar mistakes found in the review of revision 0. Extra spaces, double periods were removed, commas were either placed or removed from the document in places where appropriate, and hyphens were placed or removed between words when needed i.e. (site specific vs. site-specific). These changes did not change intent of the Emergency Plan.

Proposed changes 7 and 8 revise the titles of positions that support the ERO. Responsibilities of these positions have not changed, only the titles.

Proposed changes 10, 19 and 20 change terminology when referring to the Duke Energy Common EOF. The locations identified referred to the EOF as the Duke Energy EOF, the Duke Energy Common EOF, The Charlotte EOF, or the Corporate EOF. These changes simply align the terminology when the Duke Energy EOF is referred to in the Common Emergency Plan. The location, facility, nor equipment has been changed as a result of aligning this term.

Proposed change 11 adds "[1]" and [Note 1] to specify the referenced note below in the table. Intent of the note was not changed by adding these brackets and the 1.

Proposed change 23 revised the procedure numbers and titles of documents that support the common emergency plan implementation. Old versions of documents were considered Controlled Supporting Documents (CSDs) referring to lower tiered documents. The Documents referred to in table P.6-1 are licensing documents. Document Control requested that these documents be changed in document number to not include the CSD designation. Title changes were made to aid in user reference. No change in internal content was made as a result of these new titles and document numbers.

<b>Section VIII: Emergency Planning Element and Function Screen</b>		
<i>(Utilize Reg Guide 1.219 and Attachment 1, Additional Regulatory Guidance References for additional assistance)</i>		
<b>Does any of Proposed Activities/Changes Identified in Section I impact any of the following, including program elements from NUREG-0654/FEMA REP-1 Section II? If yes check appropriate box.</b>		
<b>1</b>	<b>10 CFR 50.47(b)(1) Assignment of Responsibility (Organization Control)</b>	
1a	Responsibility for emergency response is assigned.	<input type="checkbox"/>
1b	The response organization has the staff to respond and to augment staff on a continuing basis (24-7 staffing) in accordance with the emergency plan.	<input type="checkbox"/>
<b>2</b>	<b>10 CFR 50.47(b)(2) Onsite Emergency Organization</b>	
2a	Process ensures that on shift emergency response responsibilities are staffed and assigned	<input type="checkbox"/>
2b	The response organization has the staff to respond and to augment staff on a continuing basis (24-7 staffing) in accordance with the emergency plan.	<input type="checkbox"/>
<b>3</b>	<b>10 CFR 50.47(b)(3) Emergency Response Support and Resources</b>	
3a	Arrangements for requesting and using off site assistance have been made.	<input type="checkbox"/>
3b	State and local staff can be accommodated at the EOF in accordance with the emergency plan.	<input type="checkbox"/>
<b>4</b>	<b>10 CFR 50.47(b)(4) Emergency Classification System</b>	<b>RS</b>
4a	A standard scheme of emergency classification and action levels is in use. <b>(Requires V/V (Attachment 5) and final approval of Screen and Evaluation by EP CFAM)</b>	<input type="checkbox"/>
<b>5</b>	<b>10 CFR 50.47(b)(5) Notification Methods and Procedures</b>	<b>RS</b>
5a	Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes (60 minutes for CR3) after declaration of an emergency and providing follow-up notification.	<input type="checkbox"/>
5b	Administrative and physical means have been established for alerting and providing prompt instructions to public within the plume exposure pathway.	<input type="checkbox"/>
5c	The public ANS meets the design requirements of FEMA-REP-10, Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants, or complies with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter	<input type="checkbox"/>
<b>6</b>	<b>10 CFR 50.47(b)(6) Emergency Communications</b>	
6a	Systems are established for prompt communication among principal emergency response organizations.	<input type="checkbox"/>
6b	Systems are established for prompt communication to emergency response personnel.	<input type="checkbox"/>
<b>7</b>	<b>10 CFR 50.47(b)(7) Public Education and Information</b>	
7a	Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway emergency planning zone (EPZ).	<input type="checkbox"/>
7b	Coordinated dissemination of public information during emergencies is established.	<input type="checkbox"/>
<b>8</b>	<b>10 CFR 50.47(b)(8) Emergency Facilities and Equipment</b>	
8a	Adequate facilities are maintained to support emergency response	<input checked="" type="checkbox"/>
8b	Adequate equipment is maintained to support emergency response.	<input type="checkbox"/>
<b>9</b>	<b>10 CFR 50.47(b)(9) Accident Assessment</b>	<b>RS</b>
9a	Methods, systems, and equipment for assessment of radioactive releases are in use.	<input checked="" type="checkbox"/>

<b>10</b>	<b>10 CFR 50.47(b) (10) Protective Response</b>	<b>RS</b>
10a	A range of public PARs is available for implementation during emergencies.	<input type="checkbox"/>
10b	Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.	<input type="checkbox"/>
10c	A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.	<input type="checkbox"/>
10d	KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public.	<input type="checkbox"/>
<b>11</b>	<b>10 CFR 50.47(b) (11) Radiological Exposure Control</b>	
11a	The resources for controlling radiological exposures for emergency workers are established.	<input type="checkbox"/>
<b>12</b>	<b>10 CFR 50.47(b) (12) Medical and Public Health Support</b>	
12a	Arrangements are made for medical services for contaminated, injured individuals.	<input type="checkbox"/>
<b>13</b>	<b>10 CFR 50.47(b) (13) Recovery Planning and Post-Accident Operations</b>	
13a	Plans for recovery and reentry are developed.	<input type="checkbox"/>
<b>14</b>	<b>10 CFR 50.47(b) (14) Drills and Exercises</b>	
14a	A drill and exercise program (including radiological, medical, health physics and other program areas) is established.	<input checked="" type="checkbox"/>
14b	Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills are assessed via a formal critique process in order to identify weaknesses.	<input type="checkbox"/>
14c	Identified weaknesses are corrected.	<input type="checkbox"/>
<b>15</b>	<b>10 CFR 50.47(b) (15) Emergency Response Training</b>	
15a	Training is provided to emergency responders.	<input type="checkbox"/>
<b>16</b>	<b>10 CFR 50.47(b) (16) Emergency Plan Maintenance</b>	
16a	Responsibility for emergency plan development and review is established.	<input type="checkbox"/>
16b	Planners responsible for emergency plan development and maintenance are properly trained.	<input type="checkbox"/>
<b>Section VIII: Conclusion</b>		
<input checked="" type="checkbox"/> If any <b>Section VIII</b> criteria are checked, continue the 50.54(q) Review <b>Section IX</b> . <input type="checkbox"/> If no <b>Section VIII</b> criteria are checked, 10CFR50.54(q)(3) Evaluation is NOT required. Document the basis for conclusion below and continue to <b>Section XIV</b> .		



Proposed changes 3, 9, 21, 22, 25, 26, and 27 adds attachments to the table of contents and move tables and appendices to attachments in the document. These changes are the result of the conversion of the document to the Procedure Automation System (PAS) tool used by Duke Energy as the standard formatting tool for Duke Energy procedures. Table B-1, Table P.6-1, and Table P.7-1 would not convert as written in the original revision 0 of the Common Emergency Plan. Therefore, these tables were removed from their original section and placed as attachments later in the document. Appendices created in Revision 0 are now new Attachments 4, 5 and 6. They are still titled appendices, however, due to the formatting changes they are attachments to the document. The content of these tables remains the same. The color and note section of Table B-1 (Attachment 1) did change as a result of the PAS conversion as well. The notes at the bottom of the table were placed in columns to fit the page easier. The color was removed because PAS does not include the option to change font color. These changes did not result in any changes of intent to these tables or appendices.

Proposed change 4, revises a paragraph in the introduction of Section 1 "Introduction". The last sentence of the third paragraph was removed from the introduction section. The sentence was placed as the first paragraph of section 2 and modified to accommodate for the added sections due to the PAS reformatting. There is no intent change as a result of removing the sentence from this introduction section. The sentence is more appropriate as a description introduction of the new Section II of the Duke Energy Common Emergency Plan.

Proposed change 5 revises the last paragraph of the introduction. A modification of the sections in the common emergency plan were due to formatting with the conversion to the standard Duke Energy PAS document program. The sections in Revision 0 of the Common Emergency Plan were only sections 1 through 3. The PAS conversion created sections for each planning standard as well. This led to the modification in the paragraphs pointing to section 3.0 through section 18.0 "organized using the structure of NUREG-0654" instead of only section 2 "being organized using the structure of NUREG-0654". There were no changes in intent of these statements to the Duke Energy Common Emergency Plan.

Proposed change 6 adds a sentence as an introduction to Section II describing to the user how the Duke Energy Common Emergency Plan is organized. The modifications of the sections in the common emergency plan were due to formatting with the conversion to the standard Duke Energy PAS document program. The original sections in Revision 0 of the Common Emergency Plan were only sections 1 through 3. The PAS conversion created sections for each planning standard as well. This lead to the modification in the paragraphs pointing to section 3.0 through section 18.0 "organized using the structure of NUREG-0654" instead of only section 2 "being organized using the structure of NUREG-0654". There were no changes in intent of these statements to the emergency plan.

Proposed change 12 removes the words "assistant director" as the approval authority of News Releases. The NRC approval of the Duke Energy Common Emergency Plan removed the position of Assistant EOF Director from the Emergency Plan. Removal of this position does not produce any additional responsibilities or functions on the EOF director as the EOF director already had the responsibility. Timeliness of approving news releases is not delayed either, due to the Company spokesperson also prepared to approve when the JIC is activated. There is no reduction in effectiveness of the Duke Energy Common Emergency Plan as a result of the removal of this position from this paragraph.

Proposed change 13 removes the implication of the use of "EP-NET" in all Duke Energy TSC facilities. Some Duke Energy TSCs do not have EP-NET in their TSCs and use an Operational Aid Computer (OAC) for Met data. Although it was desired to utilize EP-NET in all TSC facilities during the draft of the Common Emergency Plan, Catawba, McGuire and Oconee have not yet transitioned to the use of EP-NET. They continue to use Operator Aid Computers (OAC). The OAC has the ability to provide the needed Met data for assessing accident conditions. There is currently no time frame for when EP-NET will be deployed in these remaining TSC Facilities. Therefore, revising this paragraph of H.13 is appropriate to make the information available utilizing more generic terminology and providing examples of those technologies utilized to receive this information. This generic terminology also aligns with the same terminology used in section H element H.8. All information remains available for use in the TSC facilities.

Proposed change 17 completes a sentence that was inadvertently not completed with the submittal of the Duke Energy Common Emergency Plan to the NRC. Completing this sentence improves the paragraph and provides the intended outcome should the emergency plan not be satisfactorily tested during the biennial exercise. The results of which could lead to a request by the NRC to conduct a remedial exercise. This was the original intent of this paragraph in Section N, Element N.1.a.

Proposed change 24 added references to sections and procedures to Section P, Table P.7-1 as a result of new procedures created for Duke Energy fleet use that superseded other site-specific procedures. AD-EP-ALL-1000 was added for implementation of section G of the Duke Energy Common Emergency Plan. Table P.7-1 is the listing of procedures that implement sections of the emergency plan. This proposed change shows all fleet procedures used by the Duke Energy fleet.

The proposed changes do not affect any planning standards, and therefore, require no further evaluation. There is no reduction in effectiveness of the Duke Energy Common Emergency Plan.

**Section IX: Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change**

Copy each emergency planning standard, function and program element affected by the proposed change that was identified as applicable in **Section VIII**. Continue to **Section X**.

**10 CFR 50.47(b)(8)—Emergency Facilities and Equipment**

“Adequate emergency facilities and equipment to support the emergency response are provided and maintained.”

The applicable planning function is: emergency planning functions have been defined for this planning standard:

(2) Adequate equipment is maintained to support emergency response.

The applicable Sections of Appendix E to 10 CFR Part 50 IV supply supporting requirements.

E. Emergency Facilities and Equipment

E. 2. Equipment for determining the magnitude of and for continuously assessing the impact of the release of radioactive materials to the environment;

G. Maintaining Emergency Preparedness

Provisions to be employed to ensure that the emergency plan, its implementing procedures, and emergency equipment and supplies are maintained up to date shall be described.

Informing criteria appear in Section II.H of NUREG-0654

H.13 - Each organization identifies the location(s) for the receipt and analysis of field monitoring data and coordination of sample media, and identifies the organization(s) responsible for assessing radiological data.

**10 CFR 50.47(b)(9)—Emergency Assessment Capability**

“Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.”

The following emergency planning function has been defined for this planning standard:

Methods, systems, and equipment for assessment of radioactive releases are in use.

The applicable Sections of Appendix E to 10 CFR Part 50 provide supporting requirements.

B. Assessment Actions

1. The means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety. The emergency action levels shall be based on in-plant conditions and instrumentation in addition to onsite and offsite monitoring. By June 20, 2012, for nuclear power reactor licensees, these action levels must include hostile action that may adversely affect the nuclear power plant. The initial emergency action levels shall be discussed and agreed on by the applicant or licensee and state and local governmental authorities, and approved by the NRC. Thereafter, emergency action levels shall be reviewed with the State and local governmental authorities on an annual basis.

#### E. Emergency Facilities and Equipment

E. 2. Equipment for determining the magnitude of and for continuously assessing the impact of the release of radioactive materials to the environment;

Informing criteria appear in Section II.I of NUREG-0654

I.1.c - A capability to coordinate and implement in-field radiological assessments by FMTs and provisions to assess the data obtained.

#### **10 CFR 50.47(b)(14)—Drill and Exercise Program**

“Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.”

The applicable emergency planning function identified for this planning standard:

(2) Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills, are assessed via a formal critique process to identify weaknesses.

The applicable Sections of Appendix E to 10 CFR Part 50 provide supporting requirements.

#### F. Training

2. The plan shall describe provisions for the conduct of emergency preparedness exercises as follows: Exercises shall test the adequacy of timing and content of implementing procedures and methods, test emergency equipment and communications networks, test the public alert and notification system, and ensure that emergency organization personnel are familiar with their duties.

Informing criteria appear in Section II.N of NUREG-0654

N.1.a - The process to critique/evaluate exercises and drills is described.

**Section X: Describe How the Proposed Change Complies with Relevant Emergency Preparedness Regulation(s) and Previous Commitment(s) Made to the NRC**

If the emergency plan, modified as proposed, no longer complies with planning standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50, then ensure the change is rejected, modified, or processed as an exemption request under 10 CFR 50.12, Specific Exemptions, rather than under 10 CFR 50.54(q). Address each Planning Standard identified in **Section IX. Continue to Section XI.**

Proposed change 14 removes the Duke Energy EOF as the primary location to receive samples and analyze field monitoring team environmental sample data. As written in Revision 0 of the Duke Energy Common Emergency Plan, the statement implies that samples of environmental data are sent to the EOF for analysis. The EOF does not maintain any equipment for this task. As stated in H.8 of the Common Emergency Plan "*Facilities for counting and analyzing samples can be provided by any Duke Energy nuclear site and the Duke Energy Environmental Laboratory near MNS.*" The EOF holds the responsibility to provide the coordination of receipt and analysis of the environmental data. Removing the statement that the EOF is the primary location for receipt and analysis will prevent delay of sample analysis so that the sample can be received at the correct location coordinated by the EOF. Adequate emergency facilities to support the emergency response continue to be provided and maintained, and adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition continue to be in use. Therefore, the Duke Energy Common Emergency Plan continues to comply with 10 CFR 50.47(b)(8)—Emergency Facilities and Equipment, and 10 CFR 50.47(b)(9)—Emergency Assessment Capability.

Proposed changes 15 and 16, are a result of NRC RAI-7 from the Duke Energy Common Emergency Plan submittal. The original submittal of the common emergency plan proposed 2 field monitoring teams to respond at an ALERT or higher declaration within 75 minutes. NUREG-0654 Revision 2 guidance calls for a 60-minute response *"in order to be ready to respond to a radiological release, or to detect radiation in the field thus confirming and quantifying the release."* In NRC RAI-7, the NRC requested *"additional justification for extending the capability to perform onsite/near site surveys or offsite surveys at 60 minutes from an Alert emergency declaration. This justification should not rely on the two on-shift RP technicians who would be expected to have an increasing RP burden at 60 minutes which will be compounded by augmenting RP technicians not arriving until 75 minutes after the classification of an Alert ECL."* Duke Energy's Response to RAI-7 states the following *"As shown in Enclosure 2, the proposed Duke Energy Common Emergency plan Table B-1 is revised to reflect one (1) onsite field monitoring (FM) Technician responding within 60 minutes of an Alert or higher ECL."* Thus, one on-site FMT Technician is now required in the Duke Energy Common Emergency plan. This new requirement for an onsite FM Technician required a change to the definitions of onsite and offsite when it came to the elements that describe these positions of Onsite and Offsite FMTs, as described in proposed change 15 and 16. Within Section I Element 1.c, Onsite was defined as within the Owner Controlled Area. Revision 1 changes the definition for this element as within the Protected area. Offsite is now defined in this element as anything outside the protected area. This continues to allow 1 Technician to monitor for areas within close proximity of the control room and validate any releases as described in NUREG 0654 guidance and meet the requirements as answered in RAI-7 from the NRC. Since protected areas are much smaller in size than anything outside the protected area, a dedicated vehicle for the onsite FM technician is not required. Equipment for this technician continues to be readily available as described. Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition continue to be in use. Therefore, the Duke Energy Common Emergency Plan continues to comply with 10 CFR 50.47(b)(9)—Emergency Assessment Capability.

Proposed change 18 changes element N.3 of section N to include on-site maps and data for use of the on-site field monitoring technician if warranted by the scenario events. Offsite radiological data continues to be supplied for field monitoring teams outside of the protected area if warranted by the scenario events. This proposed change will help ensure sufficient detail in a scenario to promote expected ERO response to the data and situations presented by the scenario. Periodic exercises will be conducted to evaluate major portions of emergency response capabilities, periodic drills will be conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills will be corrected. Therefore, the Duke Energy Common Emergency Plan continues to comply with 10 CFR 50.47(b)(14)—Drill and Exercise Program.

**Section XI: Description of Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions**

Address each function identified in **Section IX**. **Continue to Section XII**.

Proposed change 14 removes the Duke Energy EOF as the primary location to receive samples and analyze field monitoring team environmental sample data. As written in Revision 0 of the Duke Energy Common Emergency Plan, the statement implies that samples of environmental data is sent to the EOF for analysis. The EOF does not maintain any equipment for this task. As stated in H.8 of the Common Emergency Plan *"Facilities for counting and analyzing samples can be provided by any Duke Energy nuclear site and the Duke Energy Environmental Laboratory near MNS."* The EOF holds the responsibility to provide the coordination of receipt and analysis of the environmental data. Removing the statement that the EOF is the primary location for receipt and analysis will prevent delay of sample analysis so the samples can be received at the correct location coordinated by the EOF. Adequate equipment continues to be maintained to support emergency response and methods, systems, and equipment for assessment of radioactive releases continue to be in use.

Proposed changes 15, and 16 are a result of NRC RAI-7 from the Duke Energy Common Emergency Plan submittal. The original submittal of the common emergency plan proposed 2 field monitoring teams to respond at an ALERT or higher declaration within 75 minutes. NUREG-0654 Revision 2 guidance calls for a 60-minute response *"in order to be ready to respond to a radiological release, or to detect radiation in the field thus confirming and quantifying the release."* In NRC RAI-7, the NRC requested *"additional justification for extending the capability to perform onsite/near site surveys or offsite surveys at 60 minutes from an Alert emergency declaration. This justification should not rely on the two on-shift RP technicians who would be expected to have an increasing RP burden at 60 minutes which will be compounded by augmenting RP technicians not arriving until 75 minutes after the classification of an Alert ECL."* Duke Energy's Response to RAI-7 states the following *"As shown in Enclosure 2, the proposed Duke Energy Common Emergency plan Table B-1 is revised to reflect one (1) onsite field monitoring (FM) Technician responding within 60 minutes of an Alert or higher ECL."* Thus, one on-site FMT Technician is now required in the Duke Energy Common Emergency plan. This new requirement for an onsite FM Technician required a change to the definitions of onsite and offsite when it came to the elements that describe these positions of Onsite and Offsite FMTs, as described in proposed change 15 and 16. Within Section I Element 1.c, Onsite was defined as within the Owner Controlled Area. Revision 1 changes the definition for this element as within the Protected area. Offsite is now defined in this element as anything outside the protected area. This continues to allow 1 Technician to monitor for areas within close proximity of the control room and validate any releases as described in NUREG-0654 guidance and meet the requirements as answered in RAI-7 from the NRC. Since protected areas are smaller in size than anything outside the protected area, a dedicated vehicle for the onsite FM technician is not required. Equipment for this technician continues to be readily available as described. This proposed change does not change ERO staffing that would eliminate any on-shift capability to make timely and accurate estimates of the

actual or potential radiological hazards through liquid or gaseous release pathways. Methods, systems, and equipment for assessment of radioactive releases continue to be in use.

Proposed change 18 changes element N.3 of section N to include on-site maps and data for use of the on-site field monitoring technician if warranted by the scenario events. Offsite radiological data continues to be supplied for field monitoring teams outside of the protected area if warranted by the scenario events. This proposed change will help ensure sufficient detail in a scenario to promote expected ERO response to the data and situations presented by the scenario. Drills, exercises, and training evolutions that provide performance enhancing opportunities to develop, maintain, and demonstrate key skills, are assessed via a formal critique process and continue to identify weaknesses.

The proposed changes do not reduce the effectiveness of the Duke Energy Common Emergency Plan, or Site Annexes. These changes continue to provide assurances that the Emergency Response Organization has the ability and capability to:

- respond to an emergency;
- perform functions in a timely manner;
- effectively identify and take measures to ensure protection of the public health and safety; and
- effectively use response equipment and emergency response procedures.

These changes continue to meet NRC requirements, as described in 10 CFR 50.47(b) and 10 CFR 50, Appendix E as well as the requirements of the Duke Energy Common Emergency Plan and Site Annexes as written and approved.



<b>Section XII: Evaluation Conclusion</b>	
Answer the following questions about the proposed change:	
1. Does the proposed change comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
3. Does the proposed change maintain the current Emergency Action Level (EAL) scheme?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<b>Section XII: Conclusion</b>	
Questions 1, 2 and 3 are answered YES, complete step below to create CAS assignment EP03, and then continue on to <b>Section XIV</b> and implement change(s).	<input checked="" type="checkbox"/>
Complete CAS assignment EP03 - Licensing submit changes in accordance with 10 CFR 50.4(b)(5)(ii) within 30 days of change implementation	<input checked="" type="checkbox"/>
Questions 1 or 2 or 3 are answered NO, complete <b>Sections XIII</b> and <b>Section XIV</b> .	<input type="checkbox"/>

<b>Section XIII: Disposition of Proposed Change Requiring Prior NRC Approval</b>	
Will the proposed change be submitted to the NRC for prior approval?	Yes <input type="checkbox"/> No <input type="checkbox"/>
If No, reject the proposed change, or modify the proposed change and perform a new evaluation. Continue to <b>Section XIV</b> for this evaluation.	
If YES, then initiate a License Amendment Request in accordance 10 CFR 50.90, AD-LS-ALL-0002, Regulatory Correspondence, and AD-LS-ALL-0015, License Amendment Request and Changes to SLC, TRM, and TS Bases, and include the tracking number: _____ . Complete <b>Section XIV</b> .	

**Attachment 2: EP-BNP-EPLAN-ANNEX, Revision 1 10 CFR 50.54(q)**

<< 10 CFR 50.54(q) Review Form >>

<b>Section I: 10 CFR 50.54(q) Review Number: (EREG #):</b>				<b>2390327</b>	
<b>Applicable Sites and Applicability Determination # (5AD)</b>					
<input checked="" type="checkbox"/> <b>BNP</b>	2390319	<input type="checkbox"/> <b>CNS</b>		<input type="checkbox"/> <b>HNP</b>	
<input type="checkbox"/> <b>MNS</b>		<input type="checkbox"/> <b>ONS</b>		<input type="checkbox"/> <b>RNP</b>	
<b>Document #, EC #, or N/A</b>		<b>Revision # or N/A</b>		<b>Document or Activity Title</b>	
EP-BNP-EPLAN-ANNEX		001		Duke Energy Brunswick Emergency Plan Annex	

<b>Section II: Identify/Describe All Proposed Activities/Changes being Reviewed</b>
Event or action, or series of actions that may result in a change to the emergency plan or affect the implementation of the emergency plan (Use attachments, or continue additional pages as necessary): Continue to <b>Section III</b> .

EP-BNP-EPLAN-ANNEX, Duke Energy Brunswick Emergency Plan Annex, is the Brunswick specific compliment to the Duke Energy Common Emergency Plan. The Annex is being revised to update format and correct procedure references.

Change #	Section or Step #	Change From	Change to
1	Throughout	Old revision number, table of contents updates due to changes in the procedure, old revision summary, page numbers.	New revision number, updated table of contents as a result of procedure changes, updated revision summary identifying the changes made from the procedure revision request, and page numbers as a result of the changes to the procedure. Procedure format was updated to align with Procedure Automation System.
1a	Throughout	Revision 0 grammar issues found in review	Revision 1 Updated grammar issues found in review (added or removed commas, removed extra spaces, and periods, hyphens where needed).
2	Section B	CSD-EP-BNP-0603-02, Brunswick Plant On-Shift Staffing Analysis	EP-BNP-OSSA, Brunswick On-Shift Staffing Analysis
3	Section E	CSD-EP-BNP-0603-01, Brunswick Plant Alert and Notification System Design Report	EP-BNP-ANS, Brunswick Alert and Notification System Design Report
4	Section J	CSD-EP-0603-03, Brunswick Plant Evacuation Time Estimate Study	BNP-ETE, Brunswick Evacuation Time Estimate

Change #	Section or Step #	Change From	Change to
5	Section P, Table P.7-1	OPEP-02.6.30, Alternate Emergency Facility Operation	Removed from document.  Procedure superseded by AD-EP-BNP-0105, BNP Site Specific TSC Support, AD-EP-BNP-0106, BNP Site Specific OSC Support, and AD-EP-ALL-0103, Activation and Operation of the Emergency Operations Facility. These procedures can be found in Section P of the Site Annex or the Common Emergency plan.
6	Section P, Table P.7-1	OPEP-03.6.1, Release Estimates Based Upon Stack/Vent Readings	Removed from document. Removed from BNP OERP, Radiological Response Plan, in 2017
7	Section P, Table P.7-1	OPEP-03.8.2, Personnel Accountability and Evacuation	Removed from document.  Procedure superseded by AD-EP-ALL-0112, Site Assembly and Accountability
8	Section P, Table P.7-1	OPEP-03.1.3, Use of Communication Equipment	Removed from document.
9	Section P, Table P.7-1	OPEP-03.9.6, Search and Rescue	Removed from document.  Procedure superseded by AD-EP-ALL-0112, Site Assembly and Accountability, and AD-EP-ALL-0106, Activation and Operation of the Operations Support Center
10	Section P, Table P.7-1	OPEP-04.1, Record Keeping and Documentation	Removed from document.  All QA records are documented per procedure initiating the work and AD-EP-ALL-1000, Conduct of Emergency Preparedness.
11	Section P, Table P.7-1	OPEP-04.2, Emergency Facilities and Equipment	AD-EP-BNP-0407, Emergency Facilities and Equipment Added "F" to corresponding Section Implemented block. Procedure superseded by AD-EP-BNP-0407.
12	Section P, Table P.7-1	OPEP-04.5, Public Education and Information	Removed from document.  Procedure superseded by AD-EP-ALL-1000, Conduct of Emergency Preparedness.

Change #	Section or Step #	Change From	Change to
13	Section P, Table P.7-1	OPEP-04.6, Radiological Emergency Kit Inventories	Removed from document.  Procedure superseded by AD-EP-BNP-0407, Emergency Facilities and Equipment
14	Section P, Table P.7-1	OPEP-04.08, Periodic Review of Emergency Plan	Removed from document.  Procedure superseded by AD-EP-ALL-1000, Conduct of Emergency Preparedness, AD-EP-ALL-0602, Emergency Plan Change Screening and Effectiveness Evaluations 10 CFR 50.54Q, and AD-EP-ALL-0902, Offsite Interface
15	Section P, Table P.7-1	OSI-31, Medical Emergency Response and Technical Rescue	GL-SY-BNP-2801, Nuclear Security Guideline for BNP MERT Program
16	Section P, Table P.7-1	(1) All letters refer to Sub-Sections of Plan Section II, Planning Standards and Elements	Removed from document .

**Section III: Description and Review of Licensing Basis Affected by the Proposed activity or Change:**

List all emergency plan sections that were reviewed for this activity by number and title.

IF THE ACTIVITY IN ITS ENTIRETY IS AN EMERGENCY PLAN CHANGE, EAL CHANGE OR EAL BASIS CHANGE, Enter Licensing Basis affected by the change and continue to **Section VI**.

**Licensing Basis**

- EP-ALL-EPLAN, Duke Energy Common Emergency Plan Revision 0
- EP-BNP-EPLAN-ANNEX, Duke Energy Brunswick Emergency Plan Annex Revision 0

<b>Section IV: Ability to Maintain the Emergency Plan.</b> <b>Answer the following questions related to impact on the ability to maintain the Emergency Plan. Continue to Section V.</b>	
7. Do any of the elements of the proposed activity change information or intent contained in the Emergency Plan?	Yes <input type="checkbox"/> No <input type="checkbox"/>
8. Do any elements of the proposed activity change an Initiating Condition (IC), Emergency Action Level (EAL), associated EAL note or basis, including underlying calculation or basis?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Attachment 3, 10 CFR 50.54(q) Initiating Condition (IC) and Emergency Action Level (EAL) and EAL Bases Validation and Verification (V&V) Form, is required to be completed as part of this review if "Yes" is selected above in question 2.	
9. Do any elements of the proposed activity change the process or capability for alerting or notifying the public as described in the FEMA-approved Alert and Notification System Design Report?	Yes <input type="checkbox"/> No <input type="checkbox"/>
10. Do any elements of the proposed activity change the Evacuation Time Estimate results?	Yes <input type="checkbox"/> No <input type="checkbox"/>
11. Do any elements of the proposed activity change the On-Shift Staffing Analysis results?	Yes <input type="checkbox"/> No <input type="checkbox"/>
12. Does the Proposed activity require a change to the Emergency Plan Programmatic Description?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>If Question 6 was answered yes, and the document being reviewed is NOT the Emergency Plan, then exit this review until the Emergency Plan change is complete or the proposed change is modified to not change the Emergency Plan Programmatic Description.</b>	
<b>Section IV conclusion:</b> <input type="checkbox"/> If questions 1-6 in <b>Section IV</b> marked NO, then complete <b>Section V</b> . <input type="checkbox"/> If any question 1-6 of <b>Section IV</b> marked yes, then continue at <b>Section VI</b> .	

<b>Section V: Maintaining the Emergency Plan Conclusion.</b>	
<p>The questions in <b>Section IV</b> do not represent the total of all conditions that may cause a change to or impact the ability to maintain the emergency plan. Originator and reviewer signatures in <b>Section XIV</b> document that a review of all elements of the proposed change have been considered for their impact on the ability to maintain the emergency plan and their potential to change the emergency plan.</p>	
<ol style="list-style-type: none"> <li>1. Provide a brief conclusion below that describes how the conditions, as described in the emergency plan, are maintained with this activity.</li> <li>2. Select the box below when the review completes all actions for all elements of the activity and no 10CFR50.54 screening or evaluation is required for any element. Continue to <b>Section XIV</b>.</li> </ol>	
<input type="checkbox"/> I have completed a review of this activity in accordance with 10CFR50.54(q)(2) and determined that the effectiveness of the emergency plan is maintained. This activity does not make any changes to the emergency plan. No further actions are required to screen or evaluate this activity in accordance with 10CFR50.54(q)(3).	

Conclusion:

<b>Section VI: Activity Previously Reviewed? Is this activity fully bounded by an NRC approved 10CFR50.90 submittal or Alert and Notification System Design Report?</b>		
<input type="checkbox"/>	Yes	10 CFR 50.54(q) Evaluation is not required. Identify bounding source document below and continue to <b>Section XIV</b> .
<input checked="" type="checkbox"/>	No	Continue to <b>Section VII</b> .
<input type="checkbox"/>	Partially	If <b>PARTIALLY</b> , identify bounding source document and list changes bounded by the approved 10 CFR 50.90 or Alert and Notification System Design Report below.  Changes not bound by the approved 10 CFR 50.90 or Alert and Notification System Design Report (i.e., part requiring further review). Continue the review in <b>Section VII</b> .

<b>Section VII: Editorial Changes</b>		
<input type="checkbox"/>	Yes	All Activities/Changes identified in <b>Section II</b> are editorial/typographical changes such as formatting, paragraph numbering, spelling, or punctuation that does not change intent.
<input type="checkbox"/>	No	None of the Activities/Changes listed in <b>Section II</b> are editorial/typographical changes. Continue to <b>Section VIII</b> .
<input checked="" type="checkbox"/>	Partially	Some Activities/Changes are editorial/typographical.
<p>If <b>Yes</b> is checked, Identify the activities/changes listed in <b>Section II</b> that are editorial/typographical changes and provide justification below. Continue to <b>Section XIV</b>.</p> <p>If <b>Partially</b> is checked, Identify the activities/changes listed in <b>Section II</b> that are editorial/typographical changes and provide justification below. Continue to <b>Section VIII</b> for changes not identified as editorial.</p>		

Justification:

The change(s) below are defined as editorial in accordance with AD-EP-ALL-0602, and do not change the intent of the emergency plan as written.

Change 1, updates procedure format to align with the standard Duke Energy Procedure Automated System formatting, this includes updates on the cover page, document number, table of contents, and standard header to each page and updates the revision number, layout of document and the addition of some hyperlinks.

Proposed change 1a revises grammar mistakes found in the review or revision 0. Extra spaces, double periods were removed, and commas/periods were either placed or removed from the document in places where appropriate. These changes did not change intent of the Emergency Plan Annex.

Reference changes 2-5, 7, 9, 12-15, remove procedures that have been superseded by fleet and site procedures. Fleet procedures are referenced in the Common Emergency Plan. Site procedure AD-EP-BNP-0407, Emergency Facilities and Equipment, superseded OPEP-04.2, Emergency Facilities and Equipment, and OPEP-04.6, Radiological Emergency Kit Inventories, and was added to Section P. Site procedure GL-SY-BNP-2801, Nuclear Security Guideline for BNP MERT Program, superseded OSI-31, Medical Emergency Response and Technical Rescue, and was added to Section P.

Change 16 removes note that is not needed. Updating procedure format to align with PAS formatting added "Section" to each of the plan sections thus eliminating need to have a note stating letters refer to sub sections of plan. This change does not change intent of the Emergency Plan.

Removing these procedures from the reference section, and updating referenced documents as needed, does not reduce the effectiveness of the Brunswick Emergency Plan and does not change the intent of the Plan.



<b>Section VIII: Emergency Planning Element and Function Screen</b>		
<i>(Utilize Reg Guide 1.219 and Attachment 1, Additional Regulatory Guidance References for additional assistance)</i>		
<b>Does any of Proposed Activities/Changes Identified in Section I impact any of the following, including program elements from NUREG-0654/FEMA REP-1 Section II? If yes check appropriate box.</b>		
<b>1</b>	<b>10 CFR 50.47(b)(1) Assignment of Responsibility (Organization Control)</b>	
1a	Responsibility for emergency response is assigned.	<input type="checkbox"/>
1b	The response organization has the staff to respond and to augment staff on a continuing basis (24-7 staffing) in accordance with the emergency plan.	<input type="checkbox"/>
<b>2</b>	<b>10 CFR 50.47(b)(2) Onsite Emergency Organization</b>	
2a	Process ensures that on shift emergency response responsibilities are staffed and assigned	<input type="checkbox"/>
2b	The response organization has the staff to respond and to augment staff on a continuing basis (24-7 staffing) in accordance with the emergency plan.	<input type="checkbox"/>
<b>3</b>	<b>10 CFR 50.47(b)(3) Emergency Response Support and Resources</b>	
3a	Arrangements for requesting and using off site assistance have been made.	<input type="checkbox"/>
3b	State and local staff can be accommodated at the EOF in accordance with the emergency plan.	<input type="checkbox"/>
<b>4</b>	<b>10 CFR 50.47(b)(4) Emergency Classification System</b>	<b>RS</b>
4a	A standard scheme of emergency classification and action levels is in use. <b>(Requires V/V (Attachment 5) and final approval of Screen and Evaluation by EP CFAM)</b>	<input type="checkbox"/>
<b>5</b>	<b>10 CFR 50.47(b)(5) Notification Methods and Procedures</b>	<b>RS</b>
5a	Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes (60 minutes for CR3) after declaration of an emergency and providing follow-up notification.	<input type="checkbox"/>
5b	Administrative and physical means have been established for alerting and providing prompt instructions to public within the plume exposure pathway.	<input type="checkbox"/>
5c	The public ANS meets the design requirements of FEMA-REP-10, Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants, or complies with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter	<input type="checkbox"/>
<b>6</b>	<b>10 CFR 50.47(b)(6) Emergency Communications</b>	
6a	Systems are established for prompt communication among principal emergency response organizations.	<input type="checkbox"/>
6b	Systems are established for prompt communication to emergency response personnel.	<input type="checkbox"/>
<b>7</b>	<b>10 CFR 50.47(b)(7) Public Education and Information</b>	
7a	Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway emergency planning zone (EPZ).	<input type="checkbox"/>
7b	Coordinated dissemination of public information during emergencies is established.	<input type="checkbox"/>
<b>8</b>	<b>10 CFR 50.47(b)(8) Emergency Facilities and Equipment</b>	
8a	Adequate facilities are maintained to support emergency response	<input type="checkbox"/>
8b	Adequate equipment is maintained to support emergency response.	<input type="checkbox"/>
<b>9</b>	<b>10 CFR 50.47(b)(9) Accident Assessment</b>	<b>RS</b>
9a	Methods, systems, and equipment for assessment of radioactive releases are in use.	<input type="checkbox"/>

<b>10</b>	<b>10 CFR 50.47(b) (10) Protective Response</b>	<b>RS</b>
10a	A range of public PARs is available for implementation during emergencies.	<input type="checkbox"/>
10b	Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.	<input type="checkbox"/>
10c	A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.	<input type="checkbox"/>
10d	KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public.	<input type="checkbox"/>
<b>11</b>	<b>10 CFR 50.47(b) (11) Radiological Exposure Control</b>	
11a	The resources for controlling radiological exposures for emergency workers are established.	<input type="checkbox"/>
<b>12</b>	<b>10 CFR 50.47(b) (12) Medical and Public Health Support</b>	
12a	Arrangements are made for medical services for contaminated, injured individuals.	<input type="checkbox"/>
<b>13</b>	<b>10 CFR 50.47(b) (13) Recovery Planning and Post-Accident Operations</b>	
13a	Plans for recovery and reentry are developed.	<input type="checkbox"/>
<b>14</b>	<b>10 CFR 50.47(b) (14) Drills and Exercises</b>	
14a	A drill and exercise program (including radiological, medical, health physics and other program areas) is established.	<input type="checkbox"/>
14b	Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills are assessed via a formal critique process in order to identify weaknesses.	<input type="checkbox"/>
14c	Identified weaknesses are corrected.	<input type="checkbox"/>
<b>15</b>	<b>10 CFR 50.47(b) (15) Emergency Response Training</b>	
15a	Training is provided to emergency responders.	<input type="checkbox"/>
<b>16</b>	<b>10 CFR 50.47(b) (16) Emergency Plan Maintenance</b>	
16a	Responsibility for emergency plan development and review is established.	<input checked="" type="checkbox"/>
16b	Planners responsible for emergency plan development and maintenance are properly trained.	<input type="checkbox"/>
<b>Section VIII: Conclusion</b>		
<input checked="" type="checkbox"/> If any <b>Section VIII</b> criteria are checked, continue the 50.54(q) Review <b>Section IX</b> . <input type="checkbox"/> If no <b>Section VIII</b> criteria are checked, 10CFR50.54(q)(3) Evaluation is NOT required. Document the basis for conclusion below and continue to <b>Section XIV</b> .		

**Section IX: Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change**

Copy each emergency planning standard, function and program element affected by the proposed change that was identified as applicable in **Section VIII**. Continue to **Section X**.

**Planning Standard**

The regulation at 10 CFR 50.47(b)(16) states the following:

Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.

### **Function**

Two emergency planning functions have been defined for this planning standard:

- (1) Responsibility for emergency plan development and review is established.
- (2) Planners responsible for emergency plan development and maintenance are properly trained.

### **Informing Criteria from NUREG-0654**

The applicable program elements described in NUREG-0654, Section II.P state:

P.7 - An appendix containing a listing by title of the procedures required to maintain and implement the emergency plan is included. The listing includes the section(s) of the emergency plan to be implemented by each procedure.

<b><i>Section X: Describe How the Proposed Change Complies with Relevant Emergency Preparedness Regulation(s) and Previous Commitment(s) Made to the NRC</i></b>
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If the emergency plan, modified as proposed, no longer complies with planning standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50, then ensure the change is rejected, modified, or processed as an exemption request under 10 CFR 50.12, Specific Exemptions, rather than under 10 CFR 50.54(q). Address each Planning Standard identified in <b>Section IX. Continue to Section XI.</b>
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Changes 6, 8, and 10, remove procedure references that do not implement the Brunswick Emergency Plan.

- Proposed change 6, removal of OPEP-03.6.1 had been previously removed from BNP OERP Revision 90. OPEP-03.6.1 was deleted in 2017. OPEP-03.6.1 was determined to be duplicate information considering procedure OOI-01.03, Non-Routine Activities, provides information to estimate stack vent flow. ERO Staffing and ERF organizational structure was evaluated in EREG 2203147. The reference to this procedure was carried over in the Annex in error.

- Proposed change 8 removes OPEP-03.1.3, Use of Communication Equipment from Section P. This procedure provides instructions on operation of each type of communications equipment and does not implement the Emergency Plan. Notification of response organizations and communication methods are established per fleet procedure AD-EP-ALL-0304, State and County Notifications. Testing of this equipment at Brunswick Nuclear Plant is per AD-EP-BNP-0407, Emergency Facilities and Equipment. Therefore, it is acceptable to delete OPEP-03.1.3 and utilize the procedures described to implement Emergency Plan Section E and F. OPEP-03.1.3 does not implement any section of the Brunswick Emergency Plan.
- Proposed change 10, removal of OPEP-04.1, Record Keeping and Documentation, was previously deleted as all elements found in OPEP-04.1 are maintained in Fleet and site procedures. All documentation and records covered in OPEP-04.1 are maintained in the procedures below making OPEP-04.1 redundant and not necessary. Therefore OPEP-04.1 does not implement any section of the Brunswick Emergency Plan.
  - AD-DC-ALL-0201, Development and Maintenance of Controlled Procedure Manual Procedures
  - AD-DC-ALL-0002, Records Management
  - AD-EP-ALL-0803, Evaluation and Critique of Drills and Exercises
  - AD-EP-ALL-1000, Conduct of Emergency Preparedness
  - AD-EP-ALL-0305, Fleet Emergency Preparedness (EP) Alert and Notification System (ANS) Siren Program
  - AD-NO-ALL-1001, Conduct of Audit
  - OPEP-03.9.3, First Aid, Medical Care, and Transport for Injured Personnel

Therefore, it is acceptable to delete OPEP-04.1 and utilize the procedures above to maintain the BNP Emergency Plan records and documentation. This was previously documented in EREG 2382042. Although some of the procedure are not listed with in the Common Emergency Plan, documenting of records is procedurally required and outlined in each individual procedure.

- Proposed change 11 Site procedure AD-EP-BNP-0407, Emergency Facilities and Equipment, was added to Table P.7-1 because it superseded OPEP-04.2, Emergency Facilities and Equipment and included Plan Section Implemented "F" to credit Emergency Communications testing covered by AD-EP-BNP-0407.

The proposed changes do not affect any planning standards. Emergency Plan Maintenance, and Responsibilities for plan development and review and for distribution of emergency plans continue to be maintained. These changes continue to meet NRC requirements, as described in 10 CFR 50.47(b) and 10 CFR 50, Appendix E. There is no reduction in effectiveness of the Brunswick Emergency Plan Annex.

**Section XI: Description of Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions**

Address each function identified in **Section IX. Continue to Section XII.**

Changes 6, 8, and 10, remove procedure references that do not implement the Brunswick Emergency Plan.

- Proposed change 6, removal of OPEP-03.6.1 had been previously removed from BNP OERP Revision 90. OPEP-03.6.1 was deleted in 2017. OPEP-03.6.1 was determined to be duplicate information considering procedure OOI-01.03, Non-Routine Activities, provides information to estimate stack vent flow. ERO Staffing and ERF organizational structure was evaluated in EREG 2203147. The reference to this procedure was carried over in the Annex in error.
- Proposed change 8 removes OPEP-03.1.3, Use of Communication Equipment from Section P. This procedure provides instructions on operation of each type of communications equipment and does not implement the Emergency Plan. Notification of response organizations and communication methods are established per fleet procedure AD-EP-ALL-0304, State and County Notifications. Testing of this equipment at Brunswick Nuclear Plant is per AD-EP-BNP-0407, Emergency Facilities and Equipment. Therefore, it is acceptable to delete OPEP-03.1.3 and utilize the procedures described to implement Emergency Plan Section E and F. OPEP-03.1.3 does not implement any section of the Brunswick Emergency Plan.
- Proposed change 10, removal of OPEP-04.1, Record Keeping and Documentation, was previously deleted as all elements found in OPEP-04.1 are maintained in Fleet and site procedures. All documentation and records covered in OPEP-04.1 are maintained in the procedures below making OPEP-04.1 redundant and not necessary. Therefore OPEP-04.1 does not implement any section of the Brunswick Emergency Plan.
  - AD-DC-ALL-0201, Development and Maintenance of Controlled Procedure Manual Procedures
  - AD-DC-ALL-0002, Records Management
  - AD-EP-ALL-0803, Evaluation and Critique of Drills and Exercises
  - AD-EP-ALL-1000, Conduct of Emergency Preparedness
  - AD-EP-ALL-0305, Fleet Emergency Preparedness (EP) Alert and Notification System (ANS) Siren Program
  - AD-NO-ALL-1001, Conduct of Audit
  - OPEP-03.9.3, First Aid, Medical Care, and Transport for Injured Personnel

Therefore, it is acceptable to delete OPEP-04.1 and utilize the procedures above to maintain the BNP Emergency Plan records and documentation. This was previously documented in EREG 2382042. Although some of the procedure are not listed with in the Common Emergency Plan, documenting of records is procedurally required and outlined in each individual procedure.

- Proposed change 11 Site procedure AD-EP-BNP-0407, Emergency Facilities and Equipment, was added to Table P.7-1 because it superseded OPEP-04.2, Emergency Facilities and Equipment and included Plan Section Implemented "F" to credit Emergency Communications testing covered by AD-EP-BNP-0407.

The proposed changes do not affect the emergency plan function of Emergency Plan Maintenance because, responsibility for emergency plan development and review continues to be established. The proposed changes maintain the effectiveness of the Brunswick Nuclear Station Emergency Plan because responsibility for emergency plan development and review is established. These changes continue to provide assurance that the Emergency Response Organization has the ability and capability to:

- respond to an emergency;
- perform functions in a timely manner;
- effectively identify and take measures to ensure protection of the public health and safety; and
- effectively use response equipment and emergency response procedures.

These changes continue to meet NRC requirements, as described in 10 CFR 50.47(b) and 10 CFR 50, Appendix E as well as the requirements of the Brunswick Nuclear Station Emergency Plan as written and approved.

<b>Section XII: Evaluation Conclusion</b>	
Answer the following questions about the proposed change:	
1. Does the proposed change comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
3. Does the proposed change maintain the current Emergency Action Level (EAL) scheme?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<b>Section XII: Conclusion</b>	
Questions 1, 2 and 3 are answered YES, complete step below to create CAS assignment EP03, and then continue on to <b>Section XIV</b> and implement change(s).	<input checked="" type="checkbox"/>
Complete CAS assignment EP03 - Licensing submit changes in accordance with 10 CFR 50.4(b)(5)(ii) within 30 days of change implementation	<input checked="" type="checkbox"/>
Questions 1 or 2 or 3 are answered NO, complete <b>Sections XIII</b> and <b>Section XIV</b> .	<input type="checkbox"/>

<b>Section XIII: Disposition of Proposed Change Requiring Prior NRC Approval</b>	
Will the proposed change be submitted to the NRC for prior approval?	Yes <input type="checkbox"/> No <input type="checkbox"/>
If No, reject the proposed change, or modify the proposed change and perform a new evaluation. Continue to <b>Section XIV</b> for this evaluation.	
If YES, then initiate a License Amendment Request in accordance 10 CFR 50.90, AD-LS-ALL-0002, Regulatory Correspondence, and AD-LS-ALL-0015, License Amendment Request and Changes to SLC, TRM, and TS Bases, and include the tracking number:_____ . Complete <b>Section XIV</b> .	

**Attachment 3: EP-CNS-EPLAN-ANNEX, Revision 1 10 CFR 50.54(q)**



<< 10 CFR 50.54(q) Review Form >>

<b>Section I: 10 CFR 50.54(q) Review Number: (EREG #):</b>				<b>2398570</b>	
<b>Applicable Sites and Applicability Determination # (5AD)</b>					
<input type="checkbox"/> BNP		<input checked="" type="checkbox"/> CNS	2398568	<input type="checkbox"/> HNP	
<input type="checkbox"/> MNS		<input type="checkbox"/> ONS		<input type="checkbox"/> RNP	
<b>Document #, EC #, or N/A</b>	<b>Revision # or N/A</b>	<b>Document or Activity Title</b>			
EP-CNS-EPLAN-ANNEX	1	Duke Energy Catawba Emergency Plan Annex			

**Section II: Identify/Describe All Proposed Activities/Changes being Reviewed**

Event or action, or series of actions that may result in a change to the emergency plan or affect the implementation of the emergency plan (Use attachments, or continue additional pages as necessary): Continue to **Section III**.

EP-CNS-EPLAN-ANNEX, Duke Energy Catawba Emergency Plan Annex, is the Catawba specific compliment to the Duke Energy Common Emergency Plan. The Annex is being revised to update format and correct procedure references.

Change #	Section or Step #	Change From	Change to
1	Throughout	Old revision number, document cover page, document title, table of contents, header and footer, page numbers.	New revision number, document cover page, document title, updated table of contents, added revision summary, and page numbers as a result of the changes to the procedure. Procedure format was updated to align with Procedure Automation System (PAS). PAS formatting includes updating documents referenced in body of annex to include hyperlinks and are designated with blue text.
2	Throughout	Revision 0 grammar issues found in review.	Revision 1 Updated grammar issues found in review (added or removed spaces and hyphens where needed).
3	Section B	CSD-EP-CNS-0603-02, Catawba Plant On-Shift Staffing Analysis	EP-CNS-OSSA, Catawba On-Shift Staffing Analysis
4	Section E	CSD-EP-CNS-0603-01, Catawba Plant Alert and Notification System Design Report	EP-CNS-ANS, Catawba Alert and Notification System Design Report
5	Section I	I.4.a 2 <sup>nd</sup> paragraph: and Residual Heat Removal	Removed from document "and" before "Residual Heat Removal".
6	Section J	CSD-EP-CNS-0603-03, Catawba Plant Evacuation Time Estimate Study	EP-CNS-ETE, Catawba Evacuation Time Estimate
7	Section P, Table P.7.1	AD-EP-CNS-0203, CNS Site Specific Field Monitoring Information	AD-EP-CNS-0203, CNS Site Specific Field Monitoring

Change #	Section or Step #	Change From	Change to
8	Section P, Table P.7.1	RP/0/A/5000/010, Conducting a Site Assembly or Preparing the Site for an Evacuation, Plan Section Implemented: E, J, K	Removed from document.  Procedure superseded by AD-EP-ALL-0112, Site Assembly and Accountability
9	Section P, Table P.7.1	HP/0/B/1009/003, Radiation Protection Response Following a Primary to Secondary Leak, Plan Section Implemented: D, E, I	Removed from document.
10	Section P, Table P.7.1	HP/0/B/1009/005, Personnel/Vehicle Monitoring for Emergency Conditions, Plan Section Implemented: D, J	Removed from document.
11	Section P, Table P.7.1	HP/0/B/1009/006, Alternative Method for Determining Dose Rate within the Reactor Building, Plan Section Implemented: D, I	Removed from document.
12	Section P, Table P.7.1	HP/0/B/1009/007, In plant Particulate and Iodine Monitoring Under Accident Conditions, Plan Section Implemented: D, I	Removed from document.
13	Section P, Table P.7.1	HP/0/B/1009/008, Contamination Control of Injured Individuals, Plan Section Implemented: D, K, L, L	Removed from document.
14	Section P, Table P.7.1	HP/0/B/1009/014, Radiation Protection Actions Following an Uncontrolled Release of Liquid Radioactive Material, Plan Section Implemented: D, I	Removed from document.
15	Section P, Table P.7.1	HP/0/B/1009/019, Emergency Radio System Operation, Maintenance and Communication, Plan Section Implemented: F.1.b	Removed from document.
16	Section P, Table P.7.1	RP/0/A/5000/015, Core Damage Assessment, Plan Section Implemented: D, I	Removed from document.  Procedure superseded by AD-EP-PWR-0206, Core Damage Assessment During an Emergency
17	Section P, Table P.7.1	(1) after Plan Section Implemented on header of column 3 and "(1) All letters refer to Sub-Sections of Plan Section II, Planning Standards and Elements" at bottom of table.	Removed from document.

**Section III: Description and Review of Licensing Basis Affected by the Proposed activity or Change:**

List all emergency plan sections that were reviewed for this activity by number and title.

IF THE ACTIVITY IN ITS ENTIRETY IS AN EMERGENCY PLAN CHANGE, EAL CHANGE OR EAL BASIS CHANGE, Enter Licensing Basis affected by the change and continue to **Section VI**.

**Licensing Basis**

- EP-ALL-EPLAN, Duke Energy Common Emergency Plan Revision 0
- EP-CNS-EPLAN, Duke Energy Catawba Emergency Plan Annex Revision 0

**Section IV: Ability to Maintain the Emergency Plan.**

**Answer the following questions related to impact on the ability to maintain the Emergency Plan. Continue to Section V.**

13. Do any of the elements of the proposed activity change information or intent contained in the Emergency Plan?	Yes <input type="checkbox"/> No <input type="checkbox"/>
14. Do any elements of the proposed activity change an Initiating Condition (IC), Emergency Action Level (EAL), associated EAL note or basis, including underlying calculation or basis?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Attachment 3, 10 CFR 50.54(q) Initiating Condition (IC) and Emergency Action Level (EAL) and EAL Bases Validation and Verification (V&V) Form, is required to be completed as part of this review if "Yes" is selected above in question 2.	
15. Do any elements of the proposed activity change the process or capability for alerting or notifying the public as described in the FEMA-approved Alert and Notification System Design Report?	Yes <input type="checkbox"/> No <input type="checkbox"/>
16. Do any elements of the proposed activity change the Evacuation Time Estimate results?	Yes <input type="checkbox"/> No <input type="checkbox"/>
17. Do any elements of the proposed activity change the On-Shift Staffing Analysis results?	Yes <input type="checkbox"/> No <input type="checkbox"/>
18. Does the Proposed activity require a change to the Emergency Plan Programmatic Description?	Yes <input type="checkbox"/> No <input type="checkbox"/>

**If Question 6 was answered yes, and the document being reviewed is NOT the Emergency Plan, then exit this review until the Emergency Plan change is complete or the proposed change is modified to not change the Emergency Plan Programmatic Description.**

**Section IV conclusion:**

- If questions 1-6 in **Section IV** marked NO, then complete **Section V**.
- If any question 1-6 of **Section IV** marked yes, then continue at **Section VI**.

<b>Section V: Maintaining the Emergency Plan Conclusion.</b>	
<p>The questions in <b>Section IV</b> do not represent the total of all conditions that may cause a change to or impact the ability to maintain the emergency plan. Originator and reviewer signatures in <b>Section XIV</b> document that a review of all elements of the proposed change have been considered for their impact on the ability to maintain the emergency plan and their potential to change the emergency plan.</p>	
<p>1. Provide a brief conclusion below that describes how the conditions, as described in the emergency plan, are maintained with this activity.</p>	
<p>2. Select the box below when the review completes all actions for all elements of the activity and no 10CFR50.54 screening or evaluation is required for any element. Continue to <b>Section XIV</b>.</p>	
<p><input type="checkbox"/> I have completed a review of this activity in accordance with 10CFR50.54(q)(2) and determined that the effectiveness of the emergency plan is maintained. This activity does not make any changes to the emergency plan. No further actions are required to screen or evaluate this activity in accordance with 10CFR50.54(q)(3).</p>	

Conclusion:

<b>Section VI: Activity Previously Reviewed?</b> <i>Is this activity fully bounded by an NRC approved 10CFR50.90 submittal or Alert and Notification System Design Report?</i>		
<input type="checkbox"/>	Yes	10 CFR 50.54(q) Evaluation is not required. Identify bounding source document below and continue to <b>Section XIV</b> .
<input checked="" type="checkbox"/>	No	Continue to <b>Section VII</b> .
<input type="checkbox"/>	Partially	If <b>PARTIALLY</b> , identify bounding source document and list changes bounded by the approved 10 CFR 50.90 or Alert and Notification System Design Report below.  Changes not bound by the approved 10 CFR 50.90 or Alert and Notification System Design Report (i.e., part requiring further review). Continue the review in <b>Section VII</b> .

<b>Section VII: Editorial Changes</b>		
<input type="checkbox"/>	Yes	All Activities/Changes identified in <b>Section II</b> are editorial/typographical changes such as formatting, paragraph numbering, spelling, or punctuation that does not change intent.
<input type="checkbox"/>	No	None of the Activities/Changes listed in <b>Section II</b> are editorial/typographical changes. Continue to <b>Section VIII</b> .
<input checked="" type="checkbox"/>	Partially	Some Activities/Changes are editorial/typographical.
<p>If <b>Yes</b> is checked, Identify the activities/changes listed in <b>Section II</b> that are editorial/typographical changes and provide justification below. Continue to <b>Section XIV</b>.</p> <p>If <b>Partially</b> is checked, Identify the activities/changes listed in <b>Section II</b> that are editorial/typographical changes and provide justification below. Continue to <b>Section VIII</b> for changes not identified as editorial.</p>		

Justification:

The proposed changes below are defined as editorial in accordance with AD-EP-ALL-0602, and do not change the intent of the Emergency Plan as written.

Proposed change 1, updates procedure format to align with the Procedure Automated System (PAS) formatting. This Duke Energy Standard formatting includes updates on the document cover page, document number, table of contents, adds a revision summary, replaces lists separated by semicolon with bulleted lists, revises section spacing and page alignment, removes the previous revisions header and footer and replaces those with a PAS standard header to each page, updates the revision number throughout the document, adds hyperlinks to procedures referenced in body of annex. These format changes do not change the intent of the Emergency Plan.

Proposed change 2 revises grammar mistakes found in the review of revision 0. Extra spaces, and hyphens were placed or removed between words when needed i.e. (site specific vs. site-specific). These changes do not change the intent of the Emergency Plan.

Proposed reference changes 3, 4, 6, and 7 update procedure references to correct procedure number and title as needed. These changes do not change the intent of the Emergency Plan.

Proposed change 5 corrects grammar error by removing “and” before “Residual Heat Removal”. This change does not change the intent of the Emergency Plan.

Proposed reference changes 8 and 16 remove procedures that have been superseded by fleet procedures. Fleet procedures are referenced in the Common Emergency Plan. These changes do not change the intent of the Emergency Plan.

Proposed change 17 removes note that is not needed. Updating procedure format to align with PAS formatting added “Section” to each of the plan sections thus eliminating need to have a note stating letters refer to sub sections of plan. This change does not change intent of the Emergency Plan.

These editorial changes do not change the intent of the Emergency Plan and does not reduce the effectiveness of the Catawba Nuclear Station Emergency Plan.

<b>Section VIII: Emergency Planning Element and Function Screen</b>		
<i>(Utilize Reg Guide 1.219 and Attachment 1, Additional Regulatory Guidance References for additional assistance)</i>		
<b>Does any of Proposed Activities/Changes Identified in Section I impact any of the following, including program elements from NUREG-0654/FEMA REP-1 Section II? If yes check appropriate box.</b>		
<b>1</b>	<b>10 CFR 50.47(b)(1) Assignment of Responsibility (Organization Control)</b>	
1a	Responsibility for emergency response is assigned.	<input type="checkbox"/>
1b	The response organization has the staff to respond and to augment staff on a continuing basis (24-7 staffing) in accordance with the emergency plan.	<input type="checkbox"/>
<b>2</b>	<b>10 CFR 50.47(b)(2) Onsite Emergency Organization</b>	
2a	Process ensures that on shift emergency response responsibilities are staffed and assigned	<input type="checkbox"/>
2b	The response organization has the staff to respond and to augment staff on a continuing basis (24-7 staffing) in accordance with the emergency plan.	<input type="checkbox"/>
<b>3</b>	<b>10 CFR 50.47(b)(3) Emergency Response Support and Resources</b>	
3a	Arrangements for requesting and using off site assistance have been made.	<input type="checkbox"/>
3b	State and local staff can be accommodated at the EOF in accordance with the emergency plan.	<input type="checkbox"/>
<b>4</b>	<b>10 CFR 50.47(b)(4) Emergency Classification System</b>	<b>RS</b>
4a	A standard scheme of emergency classification and action levels is in use. <b>(Requires V/V (Attachment 5) and final approval of Screen and Evaluation by EP CFAM)</b>	<input type="checkbox"/>
<b>5</b>	<b>10 CFR 50.47(b)(5) Notification Methods and Procedures</b>	<b>RS</b>
5a	Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes (60 minutes for CR3) after declaration of an emergency and providing follow-up notification.	<input type="checkbox"/>
5b	Administrative and physical means have been established for alerting and providing prompt instructions to public within the plume exposure pathway.	<input type="checkbox"/>
5c	The public ANS meets the design requirements of FEMA-REP-10, Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants, or complies with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter	<input type="checkbox"/>
<b>6</b>	<b>10 CFR 50.47(b)(6) Emergency Communications</b>	
6a	Systems are established for prompt communication among principal emergency response organizations.	<input type="checkbox"/>
6b	Systems are established for prompt communication to emergency response personnel.	<input type="checkbox"/>
<b>7</b>	<b>10 CFR 50.47(b)(7) Public Education and Information</b>	
7a	Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway emergency planning zone (EPZ).	<input type="checkbox"/>
7b	Coordinated dissemination of public information during emergencies is established.	<input type="checkbox"/>
<b>8</b>	<b>10 CFR 50.47(b)(8) Emergency Facilities and Equipment</b>	
8a	Adequate facilities are maintained to support emergency response	<input type="checkbox"/>
8b	Adequate equipment is maintained to support emergency response.	<input type="checkbox"/>
<b>9</b>	<b>10 CFR 50.47(b)(9) Accident Assessment</b>	<b>RS</b>
9a	Methods, systems, and equipment for assessment of radioactive releases are in use.	<input type="checkbox"/>

<b>10</b>	<b>10 CFR 50.47(b) (10) Protective Response</b>	<b>RS</b>
10a	A range of public PARs is available for implementation during emergencies.	<input type="checkbox"/>
10b	Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.	<input type="checkbox"/>
10c	A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.	<input type="checkbox"/>
10d	KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public.	<input type="checkbox"/>
<b>11</b>	<b>10 CFR 50.47(b) (11) Radiological Exposure Control</b>	
11a	The resources for controlling radiological exposures for emergency workers are established.	<input type="checkbox"/>
<b>12</b>	<b>10 CFR 50.47(b) (12) Medical and Public Health Support</b>	
12a	Arrangements are made for medical services for contaminated, injured individuals.	<input type="checkbox"/>
<b>13</b>	<b>10 CFR 50.47(b) (13) Recovery Planning and Post-Accident Operations</b>	
13a	Plans for recovery and reentry are developed.	<input type="checkbox"/>
<b>14</b>	<b>10 CFR 50.47(b) (14) Drills and Exercises</b>	
14a	A drill and exercise program (including radiological, medical, health physics and other program areas) is established.	<input type="checkbox"/>
14b	Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills are assessed via a formal critique process in order to identify weaknesses.	<input type="checkbox"/>
14c	Identified weaknesses are corrected.	<input type="checkbox"/>
<b>15</b>	<b>10 CFR 50.47(b) (15) Emergency Response Training</b>	
15a	Training is provided to emergency responders.	<input type="checkbox"/>
<b>16</b>	<b>10 CFR 50.47(b) (16) Emergency Plan Maintenance</b>	
16a	Responsibility for emergency plan development and review is established.	<input checked="" type="checkbox"/>
16b	Planners responsible for emergency plan development and maintenance are properly trained.	<input type="checkbox"/>
<b>Section VIII: Conclusion</b>		
<p><input checked="" type="checkbox"/> If any <b>Section VIII</b> criteria are checked, continue the 50.54(q) Review <b>Section IX</b>.</p> <p><input type="checkbox"/> If no <b>Section VIII</b> criteria are checked, 10CFR50.54(q)(3) Evaluation is NOT required. Document the basis for conclusion below and continue to <b>Section XIV</b>.</p>		

**Section IX: Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change**

Copy each emergency planning standard, function and program element affected by the proposed change that was identified as applicable in **Section VIII**. Continue to **Section X**.

**Planning Standard**

The regulation at 10 CFR 50.47(b)(16) states the following:

Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.

**Function**

Two emergency planning functions have been defined for this planning standard:

- (1) Responsibility for emergency plan development and review is established.
- (2) Planners responsible for emergency plan development and maintenance are properly trained.

**Informing Criteria from NUREG-0654**

The applicable program elements described in NUREG-0654, Section II.P state:

P.7 - An appendix containing a listing by title of the procedures required to maintain and implement the emergency plan is included. The listing includes the section(s) of the emergency plan to be implemented by each procedure.

**Section X: Describe How the Proposed Change Complies with Relevant Emergency Preparedness Regulation(s) and Previous Commitment(s) Made to the NRC**

If the emergency plan, modified as proposed, no longer complies with planning standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50, then ensure the change is rejected, modified, or processed as an exemption request under 10 CFR 50.12, Specific Exemptions, rather than under 10 CFR 50.54(q). Address each Planning Standard identified in **Section IX**. **Continue to Section XI**.

Proposed changes 9-15 remove procedure references that do not implement the Catawba Emergency Plan.

Change 9, HP/0/B/1009/003 - Radiation Protection Response Following a Primary to Secondary Leak, is being removed from list of procedures used to implement various sections of the Catawba Emergency Plan. This procedure is used to meet EPRI requirements for monitoring a primary to secondary steam generator tube leak and to identify and minimize radiological hazards caused by a primary to secondary steam generator tube leak. This procedure is for leaks below Emergency Action Levels (EALs) and does not implement any sections of the Catawba Emergency Plan.

Change 10, HP/0/B/1009/005 – Personnel/Vehicle Monitoring for Emergency Conditions, is being removed from list of procedures used to implement various sections of the Catawba Emergency Plan. This procedure provided guidance for Radiation Protection personnel (RP) to perform site evacuation/relocation in a radiological emergency. AD-EP-ALL-0112 provides actions for RP to perform site evacuation/relocation in a radiological emergency. HP/0/B/1009/005 does not implement any sections of the Catawba Emergency Plan.



Change 11, HP/0/B/1009/006 – Alternative Method for Determining Dose Rate within the Reactor Building, is being removed from list of procedures used to implement various sections of the Catawba Emergency Plan. This procedure provides a method for determining containment dose rate when plant emergency conditions exist and Containment High Range Radiation Monitors EMF 53A and EMF 53B are inoperable. EALs are implemented based on EMF 53A and EMF 53B thresholds or alternate indications as listed in EALs if inoperable. HP/0/B/1009/006 does not implement any sections of the Catawba Emergency Plan.

Change 12, HP/0/B/1009/007 – In plant Particulate and Iodine Monitoring Under Accident Conditions, is being removed from list of procedures used to implement various sections of the Catawba Emergency Plan. This procedure provided redundant guidance to obtain air samples. Emergency Plan Implementing Procedure (EPIP) AD-EP-ALL-0105, Activation and Operation of the Technical Support Center, will direct airborne samples as required by the emergency event. HP/0/B/1009/007 does not implement any sections of the Catawba Emergency Plan.

Change 13, HP/0/B/1009/008 – Contamination Controls of Injured Individuals, is being removed from list of procedures used to implement various sections of the Catawba Emergency Plan. This procedure provides redundant guidance for RP response to an injury in Radiation Control Area (RCA) and provides methods for contamination control during treatment and transport of a patient to an off-site medical facility. EPIP AD-SY-ALL-0280, Medical Emergency Response Team (MERT) and Technical Rescue Programs, will direct RP response and contamination controls during treatment and transport of a patient to an off-site medical facility. AD-SY-ALL-0280 is an EPIP listed in the Duke Energy Common Emergency Plan. HP/0/B/1009/008 does not implement any sections of the Catawba Emergency Plan.

Change 14, HP/0/B/1009/014 – Radiation Protection Actions Following an Uncontrolled Release of Liquid Radioactive Material, is being removed from list of procedures used to implement various sections of the Catawba Emergency Plan. This procedure provides redundant guidance for calculating the radionuclide concentration at area water intakes following an uncontrolled release of liquid radioactive material, and the subsequent actions to be taken when the concentration exceeds regulatory (10CFR20) values. Catawba Emergency plan will be implemented if liquid release exceeds EAL thresholds. Emergency plan required notifications will continue to be completed using EPIP AD-EP-ALL-0304, State and County Notifications. HP/0/B/1009/014 does not implement any sections of the Catawba Emergency Plan.

Change 15, HP/0/B/1009/019 – Emergency Radio System Operation, Maintenance and Communication, is being removed from list of procedures used to implement various sections of the Catawba Emergency Plan. This procedure provides guidance to use radios for Field Monitoring Team (FMT) response during an emergency event or drill. As described in section F of the Catawba Emergency Plan, Cellular phones are the FMT primary communication method and satellite phones are the back-up communication method. HP/0/B/1009/019 does not implement any sections of the Catawba Emergency Plan.

The proposed changes do not affect any planning standards because, responsibilities for plan development and review and for distribution of emergency plans continue to be established, and planners continue to be properly trained. These changes continue to meet NRC requirements, as described in 10 CFR 50.47(b) and 10 CFR 50, Appendix E.

**Section XI: Description of Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions**

Address each function identified in **Section IX. Continue to Section XII.**

Proposed changes 9-15 remove procedure references that do not implement the Catawba Emergency Plan.

Change 9, HP/0/B/1009/003 - Radiation Protection Response Following a Primary to Secondary Leak, is being removed from list of procedures used to implement various sections of the Catawba Emergency Plan. This procedure is used to meet EPRI requirements for monitoring a primary to secondary steam generator tube leak and to identify and minimize radiological hazards caused by a primary to secondary steam generator tube leak. This procedure is for leaks below Emergency Action Levels (EALs) and does not implement any sections of the Catawba Emergency Plan.

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The proposed changes do not affect the emergency plan function of Emergency Plan Maintenance because, responsibility for emergency plan development and review continues to be established. The proposed changes maintain the effectiveness of the Catawba Nuclear Station Emergency Plan because responsibility for emergency plan development and review is established. These changes continue to provide assurance that the Emergency Response Organization has the ability and capability to:

- respond to an emergency;
- perform functions in a timely manner;
- effectively identify and take measures to ensure protection of the public health and safety; and
- effectively use response equipment and emergency response procedures.

These changes continue to meet NRC requirements, as described in 10 CFR 50.47(b) and 10 CFR 50, Appendix E as well as the requirements of the Catawba Nuclear Station Emergency Plan as written and approved.

<b>Section XII: Evaluation Conclusion</b>	
Answer the following questions about the proposed change:	
1. Does the proposed change comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
3. Does the proposed change maintain the current Emergency Action Level (EAL) scheme?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<b>Section XII: Conclusion</b>	
Questions 1, 2 and 3 are answered YES, complete step below to create CAS assignment EP03, and then continue on to <b>Section XIV</b> and implement change(s).	<input checked="" type="checkbox"/>
Complete CAS assignment EP03 - Licensing submit changes in accordance with 10 CFR 50.4(b)(5)(ii) within 30 days of change implementation	<input checked="" type="checkbox"/>
Questions 1 or 2 or 3 are answered NO, complete <b>Sections XIII</b> and <b>Section XIV</b> .	<input type="checkbox"/>

<b>Section XIII: Disposition of Proposed Change Requiring Prior NRC Approval</b>	
Will the proposed change be submitted to the NRC for prior approval?	Yes <input type="checkbox"/> No <input type="checkbox"/>
If No, reject the proposed change, or modify the proposed change and perform a new evaluation. Continue to <b>Section XIV</b> for this evaluation.	
If YES, then initiate a License Amendment Request in accordance 10 CFR 50.90, AD-LS-ALL-0002, Regulatory Correspondence, and AD-LS-ALL-0015, License Amendment Request and Changes to SLC, TRM, and TS Bases, and include the tracking number: _____. Complete <b>Section XIV</b> .	