414 Nicollet Mall
Minneapolis, MN 55401-1993

November 15, 2021

L-XE-21-005
10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Monticello Nuclear Generating Plant
Docket No. 50-263
Renewed Facility Operating License No. DPR-22

Prairie Island Nuclear Generating Plant, Units 1 and 2
Docket Nos. 50-282 and 50-306
Renewed Facility Operating License Nos. DPR-42 and DPR-60

License Amendment Request: Standard Emergency Plan and Consolidated Emergency Operations Facility for the Monticello Nuclear Generating Plant and the Prairie Island Nuclear Generating Plant

Pursuant to 10 CFR 50.90, the Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy proposes revisions to the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP) Emergency Plans which include the Corporate Offsite Emergency Plan. The proposed changes include:

- Adoption of a fleet Xcel Energy Standard Emergency Plan (SEP) that includes site-specific Annexes. The SEP establishes an updated licensing basis for the Xcel Energy operating plants that complies with current NRC regulations in 10 CFR 50.47, 10 CFR 50 Appendix E, and the NRC-generated guidance in NUREG-0654/FEMA-REP-1, “Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness,” Revision 2.
- Replacing the existing MNGP and PINGP near-site Emergency Offsite Facilities (EOFs), and their common backup EOF (BUEOF) with a consolidated EOF centrally located in the Xcel Energy headquarters. A license amendment to request Commission approval for locating an EOF greater than 25 miles from a nuclear power reactor site is required per 10 CFR 50, Appendix E, Section IV.E.8.b.
- Maintaining the Emergency Notification System (ENS) function in the site Technical Support Centers (TSC) rather than transferring the function to the EOF.
- Updates in staffing numbers and duties to conform with NUREG-0654/FEMA-REP-1, Revision 2.

- Re-assignment of the on-shift dose assessment from the Chemistry Technician to a Radiation Protection Technician.

By standardizing emergency plans, Xcel Energy will realize increased consistency of organizations, duties and responsibilities, procedures, and training. The proposed changes will align the plants using consistent standards and definitions.

Enclosures 1, 2, and 3 provide technical analyses evaluating the impact to the effectiveness of the plans by combining the MNGP Emergency Plan, the PINGP Emergency Plan, and the Corporate Offsite Emergency Plan, into a combined SEP with site-specific Annexes for the MNGP and PINGP, respectively. Enclosure 4 evaluates the effects of replacing the existing MNGP and PINGP near-site EOFs, and their common backup EOF with a consolidated, centrally located EOF. Enclosure 5 provides letters of concurrence from the states of Minnesota and Wisconsin for the proposed emergency plan changes. Attachments provide additional information after each enclosure.

NSPM requests approval of the proposed amendment within 12 months of the acceptance of this request. Once approved, the amendment shall be implemented within 180 days.

In accordance with 10 CFR 50.91, NSPM is notifying the State of Minnesota of this request by transmitting a copy of this application, with attachments, to the designated State Official.

If there are any questions or if additional information is needed, please contact Richard Loeffler at (612) 342-8981 or rick.a.loeffler@xcelenergy.com.

Summary of Commitments

Northern States Power Company, Minnesota, will conduct a proof-of-concept demonstration involving response to concurrent events requiring Emergency Operations Facility activation with both the MNGP and PINGP prior to implementation as described in Enclosure 4 of L-XE-21-005.

I declare under penalty of perjury, that the foregoing is true and correct.
Executed on November 15 , 2021.

Martin C. Murphy Digitally signed by Martin C. Murphy
Date: 2021.11.15 11:05:00 -06'00'

Martin C. Murphy
Director, Nuclear Licensing and Regulatory Services
Northern States Power Company – Minnesota

Enclosures (5)

cc: Administrator, Region III, USNRC
Project Manager, Monticello, USNRC
Project Manager, Prairie Island, USNRC
Resident Inspector, Monticello, USNRC
Resident Inspector, Prairie Island, USNRC
State of Minnesota

ENCLOSURE 1

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

LICENSE AMENDMENT REQUEST
STANDARD EMERGENCY PLAN

(24 Pages Follow)

ENCLOSURE 1

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

LICENSE AMENDMENT REQUEST:
STANDARD EMERGENCY PLAN

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Attachments

Attachment 1 – Xcel Energy Standard Emergency Plan

1.0 SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.90, Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy proposes revisions to the Monticello Nuclear Generating Plant (MNGP) and Prairie Island Nuclear Generating Plant (PINGP) Emergency Plans which include the Corporate Offsite Emergency Plan. The proposed revisions include:

- Adoption of a fleet Xcel Energy Standard Emergency Plan (SEP) that includes site-specific Annexes. The SEP establishes an updated licensing basis for the Xcel Energy operating plants that complies with current NRC regulations in 10 CFR 50.47, 10 CFR 50 Appendix E, and NRC-generated guidance in NUREG-0654/FEMA-REP-1, *Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness*, Revision 2.
- Replacing the existing MNGP and PINGP near-site Emergency Offsite Facilities (EOFs), and their common backup EOF (BUEOF) with a consolidated EOF centrally located in the Xcel Energy headquarters – the detailed description and analysis for this change is contained in Enclosure 4 of this submittal.
- Maintaining the Emergency Notification System (ENS) function in the site Technical Support Centers (TSC) rather than transferring the function to the EOF.
- Updates in staffing numbers and duties to conform with NUREG-0654/FEMA-REP-1, Revision 2.

By standardizing emergency plans, Xcel Energy will realize increased consistency of organizations, duties and responsibilities, procedures, and training. The proposed change will align the plants using consistent standards and definitions.

2.0 DETAILED DESCRIPTION

The current MNGP and PINGP Emergency Plans consist of plant specific emergency plans and a Corporate Offsite Emergency Plan. Under the proposed emergency plan, information that is common to the MNGP Emergency Plan, the PINGP Emergency Plan, and the Corporate Offsite Emergency Plan will be consolidated into a SEP and information that is unique to MNGP and PINGP will be contained in site specific SEP Annexes.

The proposed SEP is based on regulatory guidance contained in NUREG-0654/FEMA/REP-1, Revision 2. The format of the proposed SEP is designed to conform with the format outlined in NUREG-0654/FEMA-REP-1, Revision 2. Consequently, regulatory references, emergency planning functions, and functional elements are identified for each section of the proposed SEP. For those functional areas that are addressed in the Site-Specific Annexes, a similar format is used.

The SEP is attached as Attachment 1 to this Enclosure. A detailed description and technical evaluation of the consolidated EOF is documented in Enclosure 4.

Detailed descriptions and technical evaluations of the site emergency plan changes are documented in Enclosure 2 (Monticello), and Enclosure 3 (Prairie Island).

A Justification Matrix for each plant identifies the wording in the current plant emergency plan sections, including the corporate Offsite Emergency Plan, the revised wording and location in the SEP or Annex, and the reasoning behind or justification for the change. Justification matrices are documented in Enclosure 2, Attachment 3 (Monticello), and Enclosure 3, Attachment 3 (Prairie Island).

Two additional tables for the site Augmented Emergency Response Organization (ERO) that compare the current ERO assigned to each emergency response facility with the proposed ERO assignment to the emergency response facilities with a justification for each change is provided in Enclosure 2, Attachment 4 (Monticello), and Enclosure 3, Attachment 4 (Prairie Island).

3.0 TECHNICAL ANALYSIS

This analysis evaluates the impact to the effectiveness of combining the MNGP Emergency Plan, the Prairie Island Emergency Plan and the Corporate Offsite Emergency Plan into a consolidated SEP with site specific Annexes for MNGP and PINGP. The evaluation compares the existing emergency plan commitments[1] which are based on NUREG-0654/FEMA-REP-1, *Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants*, Revision 1, and subsequent amendments to the Emergency Plan licensing basis, with the commitments in the proposed emergency plan which are based on NUREG-0654/FEMA-REP-1, Revision 2. The evaluation is supported by attachments to the site-specific annexes that contain a detailed justification matrix.

A. Assignment of Responsibility

Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the EPZs [emergency planning zones] have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

Element Analysis:

A.1 The Xcel Energy ERO is described in Section B of the SEP. Changes to the ERO are evaluated in Section B below.

1. The term ‘commitment’ used throughout this document is not to be construed as a formal NRC commitment as described in NEI 99-04, *Guidelines for Managing NRC Commitment Changes*. Rather, “commitment” is used consistent with the NRCs usage of the term in Regulatory Guide (RG) 1.219, Revision 1, *Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors*.

The proposed SEP continues to describe overall operational roles and relationships to the total effort including Xcel Energy, Federal organizations, state organizations, county organizations, and private sector organizations.

Evaluation of interrelationships between the Xcel Energy emergency response facilities and offsite response organizations is provided in Section B.4 below.

The SEP identifies the Emergency Manager in the EOF as the having the responsibility for overall event response upon activation of that facility.

Commitments related to the identification of Federal, state, local and tribal governments, licensee, and other private sector organizations that comprise the overall response for the EPZs do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

A.2 Not applicable to licensees.

A.3 The SEP identifies primary responsibilities of each ERO position in Section B.1.a and Table B-1. Refer to Section B.1 below for an evaluation of changes to the assigned responsibilities.

A.4 The SEP states that assistance will be provided, as necessary, by federal, state, tribal and county agencies that are mandated by charter, regulation, or law to protect public health and safety. State, tribal and county organizations cooperate with Xcel Energy and have developed radiological emergency plans and procedures in an integrated manner. Letters of Agreement (LOAs) are not required with these agencies. LOAs are discussed further in element C and in site-specific annexes.

No changes to the organizations with which agreements exist or fundamental methods for maintaining these agreements are made by the adoption of the Xcel Energy SEP.

A.5 The SEP states that Xcel Energy maintains an ERO that is capable of providing continuous, 24 hour/day, operation for an extended period of time. The shift rotations for the protracted period will be designated by the Emergency Manager.

Commitments related to maintaining organizational capability for a protracted period and for ensuring continuity of resources do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

B. Emergency Response Organization

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

Element Analysis:

B.1 The proposed SEP states that the description of the normal site operating organization is contained in each sites Updated Safety Analysis Report (USAR). The proposed SEP notes that on-shift staffing requirements for non-emergency plan related functions are contained in each site's Technical Specifications or other site-specific licensing documents or administrative procedures.

Site-specific on-shift staffing analysis reports are developed in accordance with 10 CFR 50 Appendix E.IV.A.9 and NEI 10-05.

The proposed SEP identifies key positions and their responsibilities for each emergency response facility in SEP Section B.1.a and Figures B-1, B-2, B-3, and B-4.

The proposed ERO organization conforms with the guidance contained in NUREG-0654-FEMA-REP-1, Revision 2, Table B-1, *Emergency Response Organization (ERO) Staffing and Augmentation Plan*. In addition, the on-shift ERO staffing has been assessed by the staffing analysis required by 10 CFR 50, Appendix E, Section IV.A.9.IV. A functional analysis of ERO organizational changes is contained in Enclosure 2 for MNGP and Enclosure 3 for PINGP.

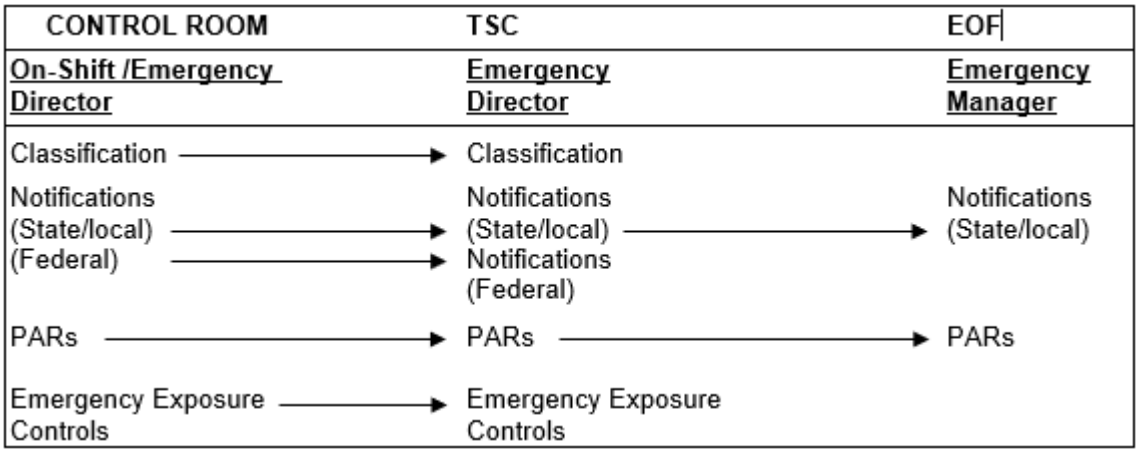
B.2 The proposed SEP states that the Shift Manager/Emergency Director (SM/ED) is the individual who is on-shift who has the authority and responsibility to immediately and unilaterally initiate any emergency actions, including providing Protective Action Recommendations (PARs) to authorities responsible for implementing offsite emergency measures and states that the SM/ED is responsible for the provision of overall event command and control until relieved.

Functional responsibilities for ERO positions are described in the SEP, Section B.1.a. Non-delegable responsibilities include:

- Event classification
- PARs for the general public
- Notification of offsite authorities
- Emergency Exposure Controls

The SEP states that the SM/ED has responsibility for event recognition and performing the non-delegable responsibilities until relieved by the Emergency Director in the TSC.

Upon activation of the EOF, responsibility for development of PARs and notification to state/local authorities transitions to the Emergency Manager. The transfer of these command-and-control activities is depicted in the diagram below.



In the current MNGP and PINGP Emergency Plans the responsibility for Federal notifications through the ENS is transferred from the TSC to the EOF. Under the proposed SEP, the responsibility for Federal notifications will be retained in the TSC.

This change is acceptable because under the proposed SEP two communicators will be assigned to the TSC within 60 minutes of event declaration to perform offsite communications. One for performing state and local communications and one for communicating with the NRC. An additional communicator will be assigned to the EOF within 90 minutes to perform state and local communications. This is consistent with the guidance in NUREG-0654/FEMA-REP-1, Revision 2.

The current Corporate Emergency Offsite Emergency Plan states that the affected site's Plant Manager or designee has the responsibility for managing the onsite emergency organization. As indicated in the MNGP and PINGP Emergency Plans, the Shift Manager (SM) is designated as person responsible for initial emergency response activities. This responsibility is transferred initially to a qualified emergency director located in the TSC.

The wording of the proposed SEP does not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plans.

B.3 The SEP states that the Xcel Energy Minimum Staff Table B-1 includes on-shift and augmented positions as identified in NUREG-0654, Revision 2, Table B-1, as well as those positions required in the TSC, OSC and EOF for facility activation.

A detailed analysis of the changes to the MNGP ERO Staffing Table is contained in Enclosure 2. A detailed analysis of the changes to the PINGP ERO Staffing Table is contained in Enclosure 3.

B.4 A block diagram showing the interfaces between the licensee and state, local, tribal government organizations is located in SEP Figure B.4-1.

Commitments in the proposed SEP related to the identification of the interfaces between and among the licensee functional areas of emergency activity, local services support, and state, local, and tribal government organizations do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

B.5 The SEP states that major equipment providers or Architect-Engineers include Westinghouse Electric Corporation and General Electric Corporation, which can provide assistance in an emergency:

The SEP also states that contracts exist with the Pooled Equipment Inventory Company (PEICo) and that contracts exist for the withdrawal of PIM PAS-1 Casks for emergency response.

Commitments in the proposed SEP related to the specification of external organizations, including contractors, that may be requested to provide technical assistance to and augmentation of the ERO do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plans.

C. Emergency Response Support and Resources

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's EOF have been made, and other organizations capable of augmenting the planned response have been identified.

Element Analysis:

C.1 The proposed SEP states that the EOF contains dedicated work areas and resources for federal personnel. Refer to Enclosure 4 for details of resources and capabilities of the proposed Xcel Energy EOF.

C.2 The proposed SEP states that Memorandums of Understanding (MOUs) and/or Letters of Agreement (LOAs) have been developed between Xcel Energy and several entities to provide emergency response support and services consistent with this plan. Refer to SEP Section C.2 for a detailed description of affected entities and their expected response. LOAs specific to MNGP are addressed in Enclosure 2. LOAs specific to PINGP are addressed in Enclosure 3.

Commitments related to LOAs, responsibilities related to initiating vendor support, and controlling site access in the proposed SEP do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

C.3 The proposed SEP states that in addition to the coordination between the individuals in command and control of each organization, Xcel Energy personnel are dispatched to state or county EOCs as liaisons. The liaisons clarify information contained in emergency notifications and provide a communications link between the Xcel Energy and governmental emergency response facilities.

When NRC representatives are present at the EOF and/or TSC, coordination occurs directly between NRC and Xcel Energy personnel.

Commitments related to coordination of the offsite response organization (ORO) capability in the proposed SEP do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

C.4 The proposed SEP states that:

Onsite Laboratory

The onsite laboratory/counting rooms at Xcel Energy sites are the primary facility for radiation monitoring and analysis efforts. The onsite laboratory is the central point for receipt and analysis of onsite samples and includes equipment for chemical and radiological analyses. The plant laboratories have the capability of quantitative analysis of water and air samples, and qualitative analysis of terrestrial samples.

Additional facilities for counting and analyzing samples are available at the unaffected Xcel Energy site or using state and federal laboratory services. These laboratories can act as backup facilities if the affected site's counting room and laboratory become unusable or the capacity or capability of the site’s laboratory is exceeded.

Commitments related to radiological laboratories or their general capabilities in the proposed SEP does not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitment.

Refer to Enclosure 2 for an analysis of contract laboratories for MNGP and refer to Enclosure 3 for an analysis of contract laboratories for PINGP.

C.5 The proposed SEP states that the TSC Emergency Director and the EOF Emergency Manager are the initial primary contact positions for the NRC site response team personnel sent to those facilities.

Xcel Energy sites have dedicated areas within the TSCs for NRC site response teams. Communications equipment, as well as instrument displays are available for use by the response teams.

Refer to Enclosure 2 and Enclosure 3 for a description of near site locations for NRC and other offsite agency staff.

Refer to Enclosure 4 for a description of the arrangements for integrating emergency response with NRC Headquarters and regional response centers and when dispatched, the NRC's site response team.

The proposed SEP states that ERO personnel will activate or confirm activation of ERDS as soon as possible but not later than one hour after declaring an alert or higher emergency classification level in accordance with 10 CFR 50.72(a)(4). It also states that the Xcel Energy ERO is staffed for and capable of maintaining continuous communications with the NRC. When requested, open communication lines will be staffed by knowledgeable personnel to ensure efficient and effective information flow.

Commitments related to ERDS and maintaining continuous communications with the NRC in the proposed SEP do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

D. Emergency Classification System

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Element Analysis:

Refer to SEP Section D, *Emergency Classification System*, for a description of the proposed emergency classification and action level scheme; the approach for developing and maintaining the scheme; the approach for obtaining and maintaining ORO concurrence; maintaining the timeliness capability of emergency classification; and a description of emergency response measures to be taken for each emergency classification level (ECL).

Commitments related to the emergency classification system do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

E. Notification Methods and Procedures

Procedures have been established for notification, by the licensee, of State and local response organizations and for notification of emergency personnel by all organizations; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway EPZ have been established.

Element Analysis:

Refer to SEP Section E, *Notifications Methods and Procedures*, for description of the process for direct and prompt notification of the ERO; the provisions for notification and verification of response organization messages; timeliness of

ORO and NRC notification; content of the initial and follow-up notification messages; and timeliness of supplemental information.

Refer to Enclosure 2 and Enclosure 3 for a description of the alert and notification systems (ANS) for MNGP and PINGP, respectively.

Commitments related to notification methods and procedures do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

F. Emergency Communications

Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

Element Analysis:

F.1 The proposed SEP states that Xcel Energy sites maintain the capability to perform emergency communications, notifying NRC and OROs, and activating the ERO. Communication systems are designed to facilitate normal and emergency communications within the plant, between the plant and emergency facilities, and between the plant and NRC and OROs. Redundant systems are provided to ensure continuous communications between entities and personnel. At least one system used for on-site communications and one system used for offsite communications is maintained with an alternate power source to ensure continuous availability.

Refer to Enclosure 2 and Enclosure 3 for a description and analysis of site-specific communications capabilities for MNGP and PINGP, respectively.

Refer to SEP Section F.1.b for a description of communications capabilities with state, county and tribal governments, NRC, and Field Monitoring Teams (FMTs) within the EPZs.

The SEP also states that Xcel Energy sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation.

Refer to Enclosure 4 for an analysis of communication methodologies and capabilities for the proposed consolidated EOF.

Commitments related to communication capabilities and methodology in the proposed SEP do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

F.2 Refer to Enclosure 2 and Enclosure 3 for an analysis of MNGP and PINGP site specific communications capabilities, respectively.

F.3 Refer to SEP Section F.3 for a description of testing methodologies and testing periodicity for each described communication system.

Refer to Enclosure 2 and Enclosure 3 for an analysis of MNGP and PINGP ANS testing, respectively.

Commitments in the proposed SEP related to communication system testing do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

G. Public Education and Information

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

Element Analysis:

Refer to SEP Section G, *Public Education and Information*, for description of the provisions made for the coordination of annual dissemination of information to the public; methods for coordinating and disseminating information to the public and media; designation of organizational news media point of contact and designation of spokespersons; the establishment of coordinated arrangements for identifying and addressing public inquires and inaccurate information; and programs to acquaint news media with the emergency plans annually.

Commitments in the proposed SEP related to public education and information do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

H. Emergency Facilities and Equipment

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

Element Analysis:

H.1 The proposed SEP states that the TSC provides a location to house personnel who are responsible for management and technical support of plant operations during emergency conditions. The TSC also functions to relieve the on-shift personnel of peripheral duties and communications not directly related to reactor system manipulations and preventing congestion in the main Control Room (MCR).

Each Xcel Energy site has a dedicated TSC for use during emergency situations to implement emergency actions and analyze and mitigate accident conditions. The TSCs are sized to accommodate ERO responders and NRC representatives. State and county personnel are not expected to report to the TSC.

The TSC is activated within 60 minutes following the declaration of an Alert or higher classification. TSC activation at the Unusual Event emergency classification level is optional. Site-specific details of the TSC are described in the site-specific annexes.

Commitments in the proposed SEP related to establishment of a TSC do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

Refer to Enclosure 2 and Enclosure 3 for a detailed description and analysis of the MNGP and PINGP TSCs, respectively.

H.2 The proposed SEP states that the Operational Support Center (OSC) provides a location where plant maintenance, operations, radiation protection and other plant emergency support personnel will assemble and stand by to assist as needed.

Each Xcel Energy site has an OSC that provides an area for coordinating and planning event response activities and for staging personnel and equipment.

The OSC is activated within 60 minutes following the declaration of an Alert or higher classification. OSC activation at the Unusual Event emergency classification level is optional.

Site-specific details of the OSC are described in the site-specific annexes.

Commitments in the proposed SEP related to establishment of an OSC do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

Refer to Enclosure 2 and Enclosure 3 for a detailed description and analysis of the MNGP and PINGP OSCs, respectively.

H.3 The proposed SEP states that the EOF is a dedicated facility located in conjunction with Xcel Energy’s general offices in Minneapolis and serves as the EOF for Xcel Energy sites. Access to the EOF is controlled using electronic card readers.

The EOF has the capability to display vital plant data and radiological information for each site and unit, in near real time, to be used by knowledgeable individuals responsible for providing technical briefings on plant conditions, event prognosis, and for management of overall emergency response.

The EOF provides reliable voice communications to each site's MCR, TSC, OSC, the NRC, and state and county warning points and EOCs.

The EOF is required to be activated within 90 minutes following the declaration of an Alert or higher classification.

The proposed Xcel Energy EOF is greater than 25 miles from MNGP and PINGP. Xcel Energy maintains space for members of an NRC Site Team and federal, state and county responders at a location near those sites.

The location and provisions of the near-site facilities are described in the site-specific annexes.

Refer to Enclosure 4 for a detailed description and analysis of the proposed consolidated Xcel Energy EOF and near site facilities for use by the NRC and offsite responders.

H.4 The proposed SEP states that an Alternative Emergency Facility for staging of ERO personnel has been designated for each Xcel Energy site and serves as a location for TSC and OSC personnel should those facilities become uninhabitable or in the cases where the facilities cannot be access such as a hostile action or natural disaster. The location of the Alternative Emergency Facility for each site is provided in the site-specific annexes.

Commitments in the proposed SEP related to establishment of an Alternative Emergency Facility do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

H.5 Refer to SEP Section G for a description of the Xcel Energy Joint Information Center (JIC) and Joint Information System (JIS).

H.6 Not applicable to Licensees

H.7 The proposed SEP states that Xcel Energy sites have installed monitoring instrumentation for seismic monitoring, radiation monitoring, fire protection and meteorological monitoring, in accordance with its USAR and plant Technical Specifications and Offsite Dose Calculation Manual (ODCM).

A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSC, OSC, EOF and the site's Alternative Emergency Facility.

Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.

Commitments in the proposed SEP related to online monitoring systems do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

H.8 The proposed SEP states that provisions are made for acquiring offsite data for meteorological, seismic, and radiological information.

Commitments in the proposed SEP related to offsite monitoring systems do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

H.9 The proposed SEP states that each Xcel Energy site maintains a sufficient supply of emergency equipment to be used for environmental monitoring. Additional offsite radiological monitoring equipment and resources are available from the other Xcel Energy nuclear plant site.

Commitments in the proposed SEP related to maintaining a sufficient supply of emergency equipment to be used for environmental monitoring do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

H.10 Refer to SEP Section H.7 for a description of onsite meteorological monitoring capabilities.

Refer to SEP Section H.8 for a description of offsite meteorological monitoring capabilities.

The proposed SEP states that site meteorological information is available directly in the MCR and is provided to the TSC and EOF.

The Emergency Response Data System (ERDS) will supply the NRC with selected meteorological data points on a near real time basis. The selected ERDS data points are transmitted via Virtual Private Network (VPN) to the NRC at approximately 1-minute intervals.

Meteorological parameters used for input into the site-specific Unified Radiological Assessment System for Consequence Analysis (RASCAL) Interface (URI) dose assessment model are described in the site-specific URI Site Annex documents.

Commitments in the proposed SEP related to obtaining current meteorological information do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

H.11 The proposed SEP states that in addition to supplies of normal use equipment and instruments, emergency kits are maintained at Xcel Energy sites. Routine quarterly inventories are performed to verify contents, and operationally check equipment/instruments in accordance with site procedures.

Sufficient reserves of instruments and equipment are maintained to replace those removed from emergency kits or lockers for calibration or repair.

Commitments in the proposed SEP related to the availability, testing, and maintenance of emergency equipment and supplies do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

H.12 The proposed SEP states that emergency kits may be assembled for radiation protection, field monitoring, first aid or other emergency use needs based on location and availability at each site.

Commitments in the proposed SEP related to emergency kits do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

H.13 The proposed SEP states that site count rooms are the primary location for receipt and analysis of field monitoring team environmental sample data. Sampling and analysis equipment are available for quantitative activity determination of liquid and air samples, and qualitative activity determination of terrestrial samples.

Commitments in the proposed SEP related to locations for the receipt and analysis of field monitoring team and environmental sample data do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

I. Accident Assessment

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

Element Analysis:

Refer to SEP Section I, *Accident Assessment*, for description of the capabilities for performing radiological assessment for reactor core and spent fuel sources; methods for assessing contamination of drinking water by waterborne releases; the capability and responsibility for monitoring parameters which provide input to radiological assessments; methods and responsibility for determining the source term present in reactor coolant, containment atmosphere, and spent fuel pool area atmosphere; the organizations responsible for FMT activities and resources; methods, equipment, and expertise to make timely assessments of actual or potential magnitude and locations of radiological hazards; the capability to detect and measure radiological concentrations in air in the plume exposure pathway EPZ as low as 10^{-7}µCi/cc; means for relating the various measured parameters to dose or dose rates; arrangements made to locate and track the airborne radioactive plume; and organizations directly responsible for radiological monitoring, analysis, and dose projections.

Commitments in the proposed SEP related to accident assessment do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

J. Protective Response

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. ETEs [Evacuation Time Estimates] have been developed by applicants and licensees. Licensees shall update the ETEs on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent

with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

Element Analysis:

Refer to SEP Section J, *Protective Response*, for description of the means and time required to alert, notify, and provide a range of protective actions for onsite individuals; provisions made and coordination with appropriate offsite entities for evacuation routes and transportation for onsite individuals to suitable offsite locations; provisions for radiological monitoring and decontamination of personnel evacuated from the site; the capability to account for individuals inside the protected area; provisions made for personal radiological protection for individuals arriving or remaining onsite; the basis and methodology established for the development of protective action recommendations (PARs); the site-specific protective action strategy informed by the evacuation time study used for coordination between the licensee and OROs; and the means for the timely providing of PARs to OROs responsible for making protective action decisions.

Refer to Enclosure 2 and Enclosure 3 for a description and analysis related to the site specific ETEs, for MNGP and PINGP, respectively.

Commitments in the proposed SEP related to protective response do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

K. Radiological Exposure Control

Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

Element Analysis:

Refer to SEP Section K, *Radiological Exposure Control* for a description of the radiation protection controls for emergency workers to be implemented during emergencies and the identification of individual(s) who can authorize personnel to receive radiation doses in excess of the occupational dose limits.

Commitments in the proposed SEP related to radiological exposure control do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

L. Medical and Public Health Support

Arrangements are made for medical services for contaminated injured individuals.

Element Analysis:

Refer to SEP Section L, *Medical and Public Health Support,* for a description of the arrangements for the medical treatment of contaminated, injured, and onsite personnel and those personnel who have received significant radiation exposures and/or significant uptakes of radioactive material; and the arrangements for the transportation of contaminated injured individuals means to control contamination while transporting victims of radiological incidents.

Commitments in the proposed SEP related to medical and public health support do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

M Recovery, Reentry, and Post-Accident Operations

General plans for recovery and reentry are developed.

Element Analysis:

Refer to SEP Section M, *Recovery and Reentry Planning and Post-Accident Operations,* for a description of the development of recovery, reentry, and return plans for radiological incidents; the identification of individuals who will compromise the licensee's recovery organization; the process for initiating recovery actions including the criteria for terminating emergencies; and the establishment of provisions for developing and modifying sampling plans.

Commitments in the proposed SEP related to recovery, reentry, and return plans do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

N. Exercises and Drills

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.

Element Analysis:

Refer to SEP Section N, *Exercises and Drills,* for a description of plans for the conduct, observation, and critique/evaluation of drills and exercises; the design of exercises to demonstrate key skills and capabilities; the development of exercise scenarios that vary content during each eight-year exercise cycle; and the design of drills to demonstrate and maintain key skills and capabilities.

Commitments in the proposed SEP related to exercises and drills include the removal of requirements for performance of the Health Physics and PASS Drills, Fire Drills and the Annual Performance Review for ANS, and add the requirement for performance of a drill to demonstrate the use of

equipment procedure and strategies for Mitigation of Beyond Design Basis Events. These changes, as outlined in the SEP and Monticello and Prairie Island Justification Matrices, align the proposed Plan and Annexes to NUREG-0654/FEMA-REP-1, Revision 2 standards.

O. Radiological Emergency Response Training

Radiological emergency response training is provided to those who may be called on to assist in an emergency.

Element Analysis:

Refer to SEP Section O, *Radiological Emergency Response Training,* for a description of the description of initial and retraining of emergency responders; and the approach to analyze jobs and tasks which are used to develop program learning objective.

Commitments in the proposed SEP related to radiological emergency response training do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

P. Responsibility for the Planning Effort: Development, Periodic Review, and Distribution of Emergency Plans

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

Element Analysis:

Refer to SEP Section P, *Responsibility for the Planning Effort: Development, Periodic Review, and Distribution of Emergency Plans,* for a description of the training and retraining program for individuals responsible for the planning effort; the identification of the individual with the overall responsibility for radiological emergency planning; the identification of the individual(s) responsible for the development, maintenance, review, updating, and distribution of emergency plans; the process for revieing annually and updating the emergency plan and associated information; the provisions for distributing and implementing procedures to required organizations; the listing of annexes, appendices, and supporting plans; the listing of procedures required to maintain and implement the emergency plan; a table of contents and a cross reference index to each of the NUREG-0654/FEMA-REP-1, Revision 2, evaluation criteria; the provisions for addressing the requirements of 10 CFR 50.54(t); the administrative process for periodic review and updating of contact information identified in the emergency plan and implementing procedures; the process for entering EP program-related issues in to the site-wide corrective action program; and the process to evaluate changes in plant configuration for the impact on emergency plan effectiveness.

Commitments in the proposed SEP related to the responsibility for the planning effort: development, periodic review, and distribution of emergency plans do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.

3.1 Conclusions

The proposed changes continue to support the functional areas of the Emergency Plan, continue to ensure the protection of the health and safety of the public and site personnel, and will not present a significant burden to the on-shift personnel. The SEP with Site-Specific Annexes will continue to meet 10 CFR 50.54(q)(2), the requirements of 10 CFR 50 Appendix E, and the planning standards of 10 CFR 50.47(b).

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements

The Standard Emergency Plan establishes an updated licensing basis for the Xcel Energy plants (i.e., the MNGP and the PINGP) that complies with current NRC regulations in 10 CFR 50.47(b) and 10 CFR 50, Appendix E. In addition, the Xcel Energy plan complies with NRC-generated guidance in NUREG-0654/FEMA-REP-1, Revision 2.

4.2 Precedent

The SEP was modeled generally after the Southern Nuclear Operating Company (SNC) Standard Emergency Plan in that the emergency planning content that is applicable to all company nuclear sites is included in a standard emergency plan and the emergency planning content that is specific to each nuclear site is included in a site-specific annex. It should be noted that the SNC SEP is based on NUREG-0654/FEMA-REP-1, Revision 1 (Reference 4).

4.3 No Significant Hazards Consideration Determination

In accordance with the requirements of 10 CFR 50.90, Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy requests an amendment to facility Renewed Operating Licenses DPR-22 for Monticello Generating Plant (MNGP) and DPR-42 and DPR-60, for Prairie Island Nuclear Generating Plant, Units 1 and 2 (PINGP) to revise the Emergency Plans.

NSPM proposes to revise each plant's license in order to adopt a fleet Xcel Energy Standard Emergency Plan (SEP) that includes site-specific annexes and consolidating the site Emergency Operations Facilities (EOFs) into a consolidated EOF centrally located in the Xcel Energy headquarters.

NSPM has performed an analysis that determined that the proposed SEP with annexes continues to meet the 10 CFR 50.47 and 10 CFR, Appendix E emergency preparedness requirements and applicable regulatory guidance.

Xcel Energy has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes have no effect on normal plant operation or on any accident initiator or precursors, and do not impact the function of plant structures, systems, or components (SSCs).

The proposed changes do not alter or prevent the ability of the emergency response organization to perform its intended functions to mitigate the consequences of an accident or event. The ability of the emergency response organization to respond adequately to radiological emergencies has been demonstrated as acceptable through a staffing analysis as required by 10 CFR 50 Appendix E.IV.A.9.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No.

   The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed), a change in the method of plant operation, or new operator actions. The proposed change does not introduce failure modes that could result in a new accident, and the change does not alter assumptions made in the safety analysis. The proposed change does not alter or prevent the ability of the emergency response organization (ERO) to perform their intended functions to mitigate the consequences of an accident or event.

   Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

   Response: No.

   Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary, and containment structure) to limit the level of radiation dose to the public. The proposed change does not impact operation of the plant or its response to transients or accidents. The change does not affect the Technical Specifications. The proposed change does not involve a change in the method of plant operation, and no accident analyses will be affected by the proposed change. Safety analysis acceptance criteria are not affected by this proposed change. The proposed revisions to the emergency plan continue to provide the necessary response staff with the proposed change.

   Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above evaluation, the NSPM has determined that operation of the facility in accordance with the proposed change does not involve a significant hazards consideration as defined in 10 CFR 50.92(c), in that it does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

4.4 Conclusions

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

5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

1. 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 – Final Report, dated December 2019 (ADAMS Accession No. ML19347D139)

2. NUREG-0696, Functional Criteria for Emergency Response Facilities – Final Report, dated February 1981 (ADAMS Accession No. ML051390358)

3. NSIR/DPR-ISG-01, Revision 0, Emergency Planning for Nuclear Power Plants, dated November 2011 (ADAMS Accession No. ML113010523)

4. NRC Letter to Southern Nuclear Operating Company, Inc., Subject: Joseph M. Farley Nuclear Plant, Units 1 and 2; Edwin I. Hatch Nuclear Plant, Units 1 and 2; and Vogtle Electric Generating Plant, Units 1, 2, 3, and 4 − Issuance of Amendments Related to Southern Nuclear Operating Company, Inc. Fleet Emergency Plan (CAC Nos. MF6670,

MF6671, MF6672, MF6673, MF6674, MF6675, and RP9516) dated March 14, 2017 ADAMS Accession No. ML16141A109)

ENCLOSURE 1

ATTACHMENT 1

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

STANDARD EMERGENCY PLAN

(EPLAN-01)

(99 Pages Follow)

Xcel Energy®	EPLAN-01	Revision: 0
Emergency Preparedness Licensing Document		Page 1 of 99
Title:	**Standard Emergency Plan**	
Approval: **XXXX**		

Table of Contents

SECTION I: INTRODUCTION

Purpose

The Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy,

In accordance with license conditions, 10CFR Part 50, and NRC Regulatory Guidance, the Standard Emergency Plan (SEP) provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to power plants operated by Xcel Energy, and plant employees. Xcel Energy operates the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP).

Background

The Xcel Energy licensing basis for meeting the requirements of 10 CFR 50.47(b) and Appendix E include the following documents:

SEP (EPLAN-01) – The SEP outlines actions taken to prepare for and respond to a declared emergency. Planning efforts common to Xcel Energy sites are encompassed within the SEP.

Site-Specific Annexes (EPLAN-02, EPLAN-03) – The Site Annexes contain information and guidance unique to the sites. The site annexes are subject to the same review and audit requirements as the SEP.

Site-Specific Emergency Action level (EAL) Technical Basis Document (EPLAN-04, EPLAN-05) – Establishes the EAL scheme used by the sites to declare emergencies. The Technical Basis document references inputs to determine values or events that would result in event classification.

Site-Specific Evacuation Time Estimate (ETE) Studies (EPLAN-06, EPLAN-07) – The ETE study defines the site's Plume Exposure (~10 mile) Emergency Planning Zone (EPZ). It documents the population within defined areas of the zone, evacuation routes and ETEs for different scenarios.

Site-Specific On-Shift Staffing Analysis (EPLAN-08, EPLAN-09) – The NEI 10-05 On-Shift Staffing Analysis fulfills the requirements of 10CFR50, Appendix E.IV, Subsection A.9.

Site-Specific Notification System (ANS) Design Report (EPLAN-10, EPLAN-11) – The report approved by the Federal Emergency Management Agency (FEMA) describes the public notification system that fulfills the requirements of 10 CFR 50, Appendix E, IV, Subsection D.3.

Scope

Detailed procedures concerning the implementation of the SEP are in the Emergency Plan Implementing Procedures (EPIPs). The EPIPs address the functional areas and actions that implement the plan and serve as the interface between the Emergency Plan, plant operations, security, and radiological control programs. Xcel Energy also has procedures in place that implement onsite protective actions and personnel accountability during hostile action threats or events that are appropriate for plant and environmental conditions. These procedures are available for use at the plants. There are supporting and complementing emergency plans, including those of federal agencies, the states of Minnesota and Wisconsin, the Prairie Island Indian Community and risk counties.

Xcel Energy Chief Nuclear Officer has overall responsibility for maintaining a state of readiness to implement this Plan for the protection of plant personnel, the general public, and property from hazards associated with nuclear power generation facilities operated by the company.

The SEP describes the organization, facilities, training, and maintenance of both onsite and offsite facilities and equipment available to implement the plan.

Site-Specific Alert and Notification System Design Report – approved by the Federal Emergency Management Agency (FEMA) describes the approved public warning system.

The SEP 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 SEP meets the emergency planning standards of 10 CFR 50.47(b), the requirements of Appendix E, and the intent of NUREG-0654 Revision 2. The SEP is organized using the structure of NUREG-0654 Revision 2, and that structure provides the cross-reference to the base document.

SECTION II: PLANNING STANDARDS AND ELEMENTS

A. Assignment Of Responsibility

Primary responsibilities for emergency response by the facility licensee and by State and local organizations within the EPZs have been assigned, the emergency responsibilities of the various supporting organization have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

Regulatory References: 10 CFR 50.47(b)(1), 44 CFR 350.5(a)(1)

A.1	The Federal, state, local and tribal governments, licensee, and other private sector organization that comprise the overall response for the EPZs are identified

A description of the Xcel Energy Emergency Response Organization (ERO) is detailed in Section B. The subsections below identify the Offsite Response Organizations (OROs), federal, state, tribal, county and other organizations that encompass the overall response organization for an event at an Xcel Energy site.

A.1.a	The organizations having an operational role specify their concept of operations and relationship to the total effort

Xcel Energy

Emergencies or accident situations at the sites are initially coordinated by the Control Room shift crew under the direction of the Shift Manager/Emergency Director (SM/ED). When an abnormal situation occurs, the SM/ED, using operating and implementing procedures determines whether it rises to the level of a declarable emergency.

For emergencies classified as Alert, Site Area Emergency and General Emergency, the SM/ED will initiate callout of the ERO.

The augmented ERO relieves the shift personnel of emergency response functions not associated with plant operations.

Federal Organizations

Nuclear Regulatory Commission (NRC)

The NRC is the coordinating agency for incidents at or caused by a facility or an activity that is licensed by the NRC or an Agreement State, with the Chairman of the Commission as the senior NRC authority for response. The Chairman can transfer control of emergency response activities when deemed appropriate.

Incident Response Centers have been established at the NRC regional offices and NRC headquarters, to centralize and coordinate NRC's emergency response. Provisions are made for NRC personnel at the plant's Technical Support Center and the Emergency Operations Facility.

Department of Homeland Security (DHS)

In accordance with the National Response Framework (NRF), DHS is responsible for the overall coordination of a multi-agency Federal response to a significant radiological incident.

Federal Emergency Management Agency (FEMA)

The primary role of FEMA is to support the states by coordinating the delivery of federal non-technical assistance. FEMA coordinates state requests for federal assistance, identifying which federal agency can best address specific needs. If deemed necessary, FEMA will establish a nearby Joint Field Office from which it will manage its assistance activities.

Department of Energy (DOE)/Radiation Emergency Assistance Center/Training Site (REAC/TS) Support

The DOE provides radiological assistance on request though the REAC/TS and has radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. Following a radiological incident, DOE operates as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP).

Federal Bureau of Investigation (FBI)

Support from the FBI is available through its statutory responsibility, based in public law and the US code, and through a memorandum of understanding for cooperation with the NRC. Notification to the FBI of emergencies in which they would have an interest will be through the provisions of a plant security plan, or by the NRC.

National Weather Service (NWS)

NWS provides meteorological information during emergency situations, if required. Data available will include existing and forecasted wind directions, wind speeds, and ambient air temperatures.

Environmental Protection Agency (EPA)

The EPA can assist with field radiological monitoring, sampling, and non-plant related recovery and reentry guidance.

State Organizations

State of Minnesota

Department of Public Safety

The Minnesota (MN) Department of Public Safety has the responsibility for notification and coordination of MN state agencies in the event of a major emergency at Monticello and Prairie Island. When the State Emergency Operations Center (SEOC) is activated, communications between departments are initiated in order to coordinate procedure implementation. The state agencies responsible for implementing procedures have established a system of 24-hour communications.

The state agencies and local government agencies are responsible for protecting the general public and providing logistical support such as food, temporary quarters, water, and sanitary facilities if evacuation and isolation is required.

Health Department

The Minnesota Department of Health (MDH) is responsible for providing radiological expertise in the State Emergency Operations Center in conjunction with the Department of Public Safety.

The Minnesota Department of Health will interpret data and participate in recommending protective actions to the Governor’s Authorized Representative.

State of Wisconsin

Wisconsin Emergency Management (WEM)

Wisconsin Emergency Management has the responsibility for notification and coordination of Wisconsin state agencies in the event of a major emergency at PINGP.

In the event of an emergency situation at the plant, PINGP will notify WEM who coordinates the implementation of emergency procedures.

Wisconsin Department of Health Services (DHS)

The Wisconsin Division of Health is responsible to prevent exposure to ionizing radiation in amounts which are detrimental to health according to nationally accepted standards.

The Wisconsin Division of Health, Radiation Protection Section, is responsible for coordination of radiation response activities in the State of Wisconsin. In the event of an emergency at Prairie Island, the Division of Health, Radiation Protection Section will be concerned with monitoring the air and water about the plant to assure that the public is not exposed to levels of radioactive pollutants potentially detrimental to public health. The Division of Health's facilities are in Madison, Wisconsin.

County Organizations

Counties within the sites' plume exposure EPZ maintain emergency plans that address the following primary response aspects:

- Notification of their own personnel and other agencies such as, local law enforcement, fire & rescue, and the Red Cross.
- Traffic control
- Notification or warning of persons in affected areas.
- Evacuation out of the affected area, and provisions for shelter, food, accommodations, communications, medical care, etc.
- Provide support to other counties, Xcel Energy, state and federal agencies.

Select counties adjacent to the sites' plume exposure EPZ maintain emergency plans to provide assistance and logistics support if evacuation of portions of the ten-mile EPZ becomes necessary.

Plume exposure and ingestion pathway EPZ counties are listed in the site-specific annexes.

Emergency Planning Zone (EPZ) Counties

The Emergency Management Agencies representing the Minnesota counties of Sherburne, Wright, Dakota, and Goodhue and the Wisconsin County of Pierce have the responsibility for notification and providing direction to residents in the event of an emergency that affects their respective jurisdiction. The 24-hour notification points have the responsibility to notify necessary local civil support groups in the event of an accident. The County is responsible for protection of the public and can provide personnel and equipment for evacuation, relocation, and isolation.

Private Sector Organizations

Private sector organizations are not used to provide additional personnel for positions on the Xcel Energy ERO or perform an operational role. Contractor and private organizations may be requested to provide technical assistance. Those are described in element B.5.

A.1.b	Each organization's emergency plan illustrates these interrelationships in a block diagram.

Interrelationships between the Xcel Energy emergency response facilities and offsite response organizations are provided in element B.4.

A.1.c	Each organization identifies the individual, by title/position, who will be in charge of the emergency response.

The Emergency Manager in the EOF is responsible for overall event response upon activation of that facility.

A.2	References to the applicable acts, codes, or statutes that provide the legal basis for emergency response-related authorities, including those that delegate responsibility and authority to state, local, and tribal governments are included. Each emergency plan indicates who may declare a "State of Emergency" and the powers that ensue.

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

A.3	Each organization specifies the key individual(s), by title/position, responsible for the following functions, as applicable to that organization: command and control, alert and notification, communications, public information, accident assessment, public health and sanitation, social services, fire and rescue, traffic control, emergency medical services, law enforcement, transportation, protective response (including authority to request Federal assistance and to initiate other protective actions), and radiological exposure control.

Refer to the list of primary responsibilities of each ERO position in element B.1.a, and to Table B-1 for the list of key individuals responsible for command and control, alerting and notification, communications, public information, accident assessment, protective response, and radiological exposure control.

A.4	Written agreements with the support organizations having an emergency response role within the EPZs are referenced. The agreements describe the concept of operations, emergency response measures to be provided, mutually acceptable criteria for their implementation, and arrangements for exchange of information.

Assistance will be provided, as necessary, by federal, state, tribal and county agencies that are mandated by charter, regulation, or law to protect public health and safety. State, tribal and county organizations cooperate with Xcel Energy and have developed radiological emergency plans and procedures in an integrated manner. LOAs are discussed further in element C and in site-specific annexes.

A.5	Each principal response organization is capable of continuous operations for a protracted period. The principal response organization specifies the individual, by title/position, who is responsible for ensuring continuity of resources (technical, administrative, and material).

Xcel Energy nuclear maintains an ERO that is capable of providing continuous, 24 hour/day, operation for an extended period of time. The shift rotations for the protracted period will be designated by the Emergency Manager.

B. Emergency Response Organization (ERO)

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

Regulatory References: 10 CFR 50.47(b)(2); 44 CFR 350.5(a)(2)
10 CFR Part 50, Appendix E.IV.A

B.1	The emergency plan specifies how the requirements of 10 CFR 50.47(b)(2) and the applicable sections of Appendix E to 10 CFR Part 50 are met.

10 CFR 50.47(b)(2) Compliance

Per Regulatory Guide 1.101, the criteria and recommendations contained in Revision 1 of NUREG-0654/FEMA- REP-1 are considered by the NRC staff to be acceptable methods for complying with the standards in 10 CFR 50.47 that must be met in onsite and offsite emergency response plans.

The SEP Section B is based on the criteria provided in the Revision 2 of NUREG-0654, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants”, Section II.B, “Emergency Response Organization” (ML19347D139) and the applicable sections of 10 CFR 50 Appendix E, as documented below.

10 CFR 50 Appendix E Compliance

Refer to the 10 CFR 50 Appendix E.IV.A cross-reference in Appendix 2 of this emergency plan.

B.1.a	The site-specific emergency response organization (ERO) is developed. Note that while other site programs, such as operations, fire response, rescue and first aid, and security, may be controlled via other licensing documents, it is only when these personnel are assigned EP functions that they become part of this regulatory standard. Consideration is given to ensure that EP functions are not assigned to individuals who may have difficulties performing their EP function(s) simultaneously with their other assigned (non-EP) duties. Appendix E to 10 CFR Part 50 requires licensees to perform an on-shift staffing analysis to ensure on-shift staff can support the EP functions assigned, as well as other assigned duties.

A description of the normal site operating organization is contained in each sites USAR.

The requirements for on-shift operations staff, security force staff, fire brigade and first aid staff are controlled by site-specific Technical Specifications and other site-specific licensing and administrative documents. Positions from these departments are contained in the emergency plan only when assigned an EP function that is performed during an event.

Site-specific on-shift staffing analysis reports are developed in accordance with 10 CFR 50 Appendix E.IV.A.9 and NEI 10-05. (EPLAN-08, EPLAN-09)

The ERO is composed of the following positions and assigned responsibilities:

Main Control Room (MCR)

Shift Manager/Emergency Director (SM/ED)

- Provide overall ERO command and control
- Evaluate plant conditions and approve Emergency Action Level (EAL) classifications
- Approve Protective Action Recommendations (PARs)
- Authorize personnel dose extensions
- Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs
- Direct radiation protection activities, including Field Monitoring Team (FMT) direction
- Direct and approve notifications to state and county authorities

Senior Reactor Operator (SRO)/Shift Technical Advisor (STA)

- Evaluate reactor conditions and assess for core damage
- Evaluate plant conditions and recommend EAL classifications

Shift Emergency Communicator

- Notify the ERO as needed
- Communicate required information per element E.3 to Offsite Response Organizations (ORO)

ENS Communicator (SRO/RO)

- Communicate EAL and PARs to NRC
- Activate or confirm activation of Emergency Response Data System (ERDS)
- Perform Emergency Notification System (ENS) communications

RP Technicians

- Provide RP coverage for responders accessing potentially unknown radiological environments
- Provide in-plant surveys
- Control dosimetry and radiologically controlled area (RCA) access
- Perform dose assessments and provide input regarding PARs to the SM/ED

Technical Support Center (TSC)

Emergency Director (ED)

- Approve EAL classifications
- Approve notifications to state/local agencies
- Approve Protective Action Recommendations (PARs)
- Approve personnel dose extensions
- Approve issuance of KI

TSC Manager

- Supervise TSC staffing and activities
- Assist the Emergency Director as needed

Engineering Coordinator

- Direct and coordinate engineering resources

Core Thermal Engineer

- Core damage assessment

Mechanical Engineer

- Provide engineering support and troubleshooting for mechanical systems

Electrical Engineer

- Provide engineering support and troubleshooting for electrical systems

Operations Coordinator

- Evaluate plant conditions and recommend emergency classifications

ENS Communicator

- Communicate changes in classification, PARs, protective action decisions made by offsite response organizations
- Activate / confirm activation of the Emergency Response Data System (ERDS)
- Perform notifications to the NRC as required by 10 CFR 50.72

ERF Communicator(s)

- Maintain communications and transmit key activities between the CR, TSC, OSC and EOF

Security Coordinator

- Coordinate security response with Local Law Enforcement and Federal officials
- Provide oversite for the Offsite Communicator

Offsite Communicator

- Transmit information to state/local agencies

Maintenance Coordinator

- Supporting the repair and corrective actions
- Supporting Search and Rescue efforts

Radiological Assessment Coordinator (RAC)

- Develop and recommend PARs
- Communicate changes to plant radiological conditions
- Provide oversight for facility habitability surveys

Dose Projection Specialist

- Perform dose assessment

Field Monitoring Team (FMT) Monitor

- Direct field monitoring teams for collection of dose rates and contamination levels

Field Monitoring Team (FMT)

- Conduct radiation surveys in areas at or beyond the Site Boundary
- Collect environmental samples for future analysis

HPN Communicator

- Establish communications with the NRC on the Health Physics Network (HPN) bridge line as requested
- Relay NRC requests for information on radiological conditions as needed

Operational Support Center (OSC)

OSC Coordinator

- Coordinate OSC staffing and activities

ERF Communicator

- Establish and maintain communications with the CR, TSC and EOF
- Transmit information related to key activities in the OSC

Maintenance Coordinators

- Provide oversight for OSC activities related to mechanical, electrical and I&C work

RP Coordinator

- Provide oversite for OSC activities related to radiological surveys and monitoring of radiological conditions in the plant

Emergency Operations Facility (EOF)

Emergency Manager

- Provide overall event response and control
- Approve notifications to state/local offsite agencies
- Approve PARs

EOF Manager

- Supervise EOF staffing and activities

Radiological Assessment Coordinator (RAC)

- Assess and communicate offsite radiological conditions
- Provide oversite for dose assessments and projections
- Develop and recommend PARs

Dose Projection Specialist

- Develop offsite dose projections based on event conditions for development of PARs

Offsite Communicator(s)

- Transmit information to state/local agencies

HPN Communicator

- Establish communications with the NRC on the Health Physics Network bridge line as requested
- Relate NRC requests for information on radiological conditions as needed

Field Monitoring Team (FMT) Communicator

- Relay FMT information to the Dose Projection Specialist and RAC

Offsite Agency Liaison

- Coordinate ERO and ORO activities

Security Coordinator

- Coordinate security response with Local Law Enforcement and Federal officials
- Provide oversite for the Offsite Communicator

ERF Communicator

- Establish and maintain communications with the CR, OSC, and TSC
- Transmit information related to key activities in the EOF

Joint Information Center (JIC)

Executive Spokesperson

- Serve as the Xcel Energy spokesperson for major media meetings and conferences held at the Minnesota state EOC/JIC.
- Supply information to ERO communications personnel who develop media releases at the state EOC/JIC.
- Represent Xcel Energy at the state EOC/JIC by interfacing with state officials.
- Ensure adequate liaison occurs between Xcel Energy representatives and state and county management.
- Establish 24-hour shift coverage for JIC Staff

JIC Manager

- Coordinate the efforts of Xcel Energy personnel at the state EOC/JIC
- Provide oversight for public information requests

Technical Advisor

- Brief the Executive Spokesperson on plant conditions and technical aspects of the event

State Liaison

- Serve as an interface between Xcel Energy and the states of Minnesota and Wisconsin
- Respond to state questions related to Xcel Energy response activities

County Liaison(s)

- Provide assistance to County Emergency Operations Center (EOC) personnel
- Serve as an interface between County and Xcel Energy personnel
- Resolve rumors and validate site information regarding event status
- Coordinate response efforts with Sheriff's Offices

Security Advisor

- Provide pertinent security information for security related events
- Serve as interface between Xcel Energy and State personnel

Figures B-1, B-2, B-3 and B-4 outline the organizational structure for the TSC, OSC, EOF and JIC.

B.2	An individual is designated as the on-shift emergency coordinator (individual title may vary) who has the authority and responsibility to immediately and unilaterally initiate any emergency response measures, including approving protective action recommendations (PARs) to be disseminated to authorities responsible for implementing offsite emergency response measures.

The SM/ED is the on-shift individual who has the authority and responsibility to immediately and unilaterally initiate any emergency actions, including providing PARs to authorities responsible for implementing offsite emergency measures.

The SM/ED is responsible for the provision of overall event command and control until relieved.

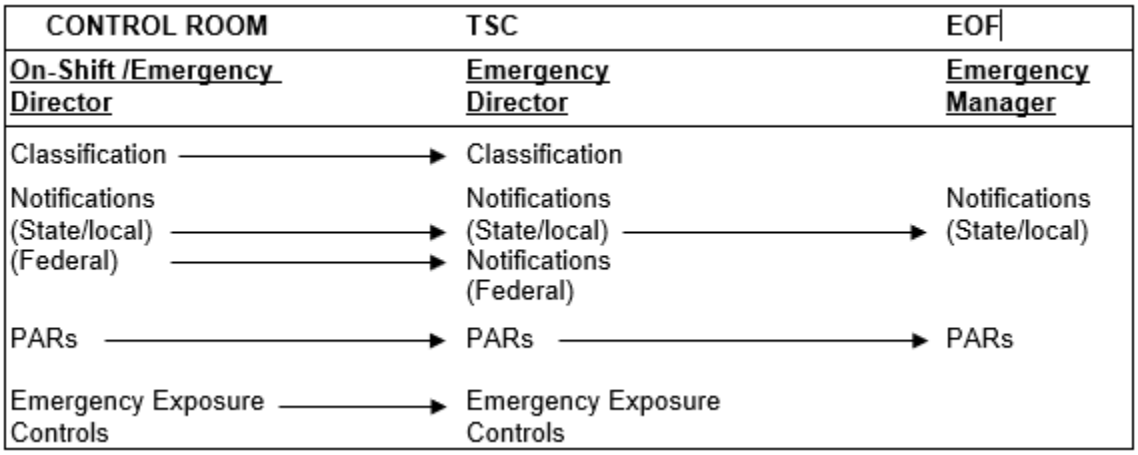
B.2.a	The functional responsibilities assigned to the ERO are established and the responsibilities that may not be delegated to other members of the ERO are clearly specified in the emergency plan.

Functional responsibilities for ERO positions are listed in element B.1.a.

Non-delegable responsibilities include the following:

- Event classification.
- PARs for the general public.
- Notification of offsite authorities
- Emergency Exposure Controls

The SM/ED has responsibility for event recognition and performing the non-delegable responsibilities until relieved by the Emergency Director in the TSC. Upon activation of the EOF, responsibility for development of PARs and notification to state/local authorities transitions to the Emergency Manager. The transfer of these command-and-control activities is depicted in the diagram below.



B.3	A table is developed depicting the site-specific on-shift staffing plan, as well as the ERO staffing augmentation plan. Table B-1, "Emergency Response Organization (ERO) Staffing and Augmentation Plan," provides a model for licensees to consider.

The Xcel Energy Minimum Staff Table B-1 includes on-shift and augmented positions as identified in NUREG-0654, Revision 2, Table B-1 as well as those positions required in the TSC, OSC and EOF for facility activation.

B.4	The interfaces between and among the licensee functional areas of emergency activity, local services support, and state, local, and tribal government organizations are identified. The information includes all licensee emergency response facilities. A block diagram is preferred for ease of use, but not required.

A block diagram showing the interfaces between the licensee and state, local, tribal government organizations is located in Figure B.4-1.

Primary Interfaces Between License, State, Local and Tribal Organizations

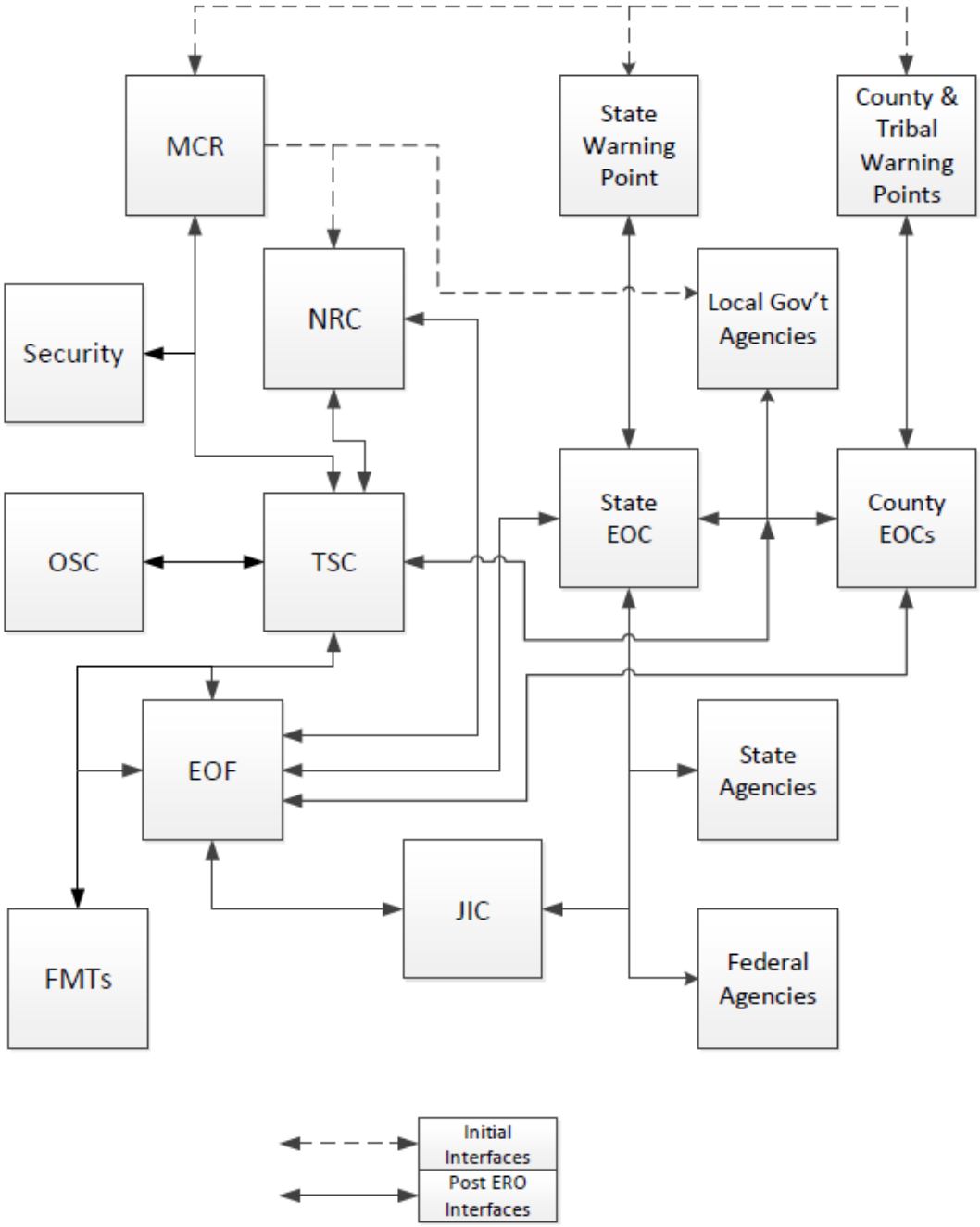


Figure B.4-1

B.5	The external organizations, including contractors, that may be requested to provide technical assistance to and augmentation of the ERO, as applicable, are specified.

Vendors and Contractors

Major equipment providers or Architect-Engineers include Westinghouse Electric Corporation and General Electric Corporation, which can provide the following assistance in an emergency:

- Trained personnel.
- Technical analysis.
- Operational analysis.
- Accident and transient analysis.

Pooled Equipment Inventory Company (PEICo)

Contracts exist for the withdrawal of PIM PAS-1Casks for emergency response.

Table B-1
Minimum On-Shift and Augmented Staffing

Major Functional Area	Major Tasks	Position Title/Expertise	Proposed On-Shift	Capability for Additions	
				60 min	90 min
Emergency Direction and Control	Classification/Oversight	Shift Manager (SRO)	1	------	------
		TSC Emergency Director (TSC)	------	1	------
		Operations Coordinator (TSC)	------	1	------
		EOF Emergency Manager (EOF)	------	------	1
Notification/ Communication	Licensee, Local/State, Federal	Shift Emergency Comm (State/local)	1	------	------
		ENS Communicator (SRO/RO)	1	------	------
		Offsite Communicator (TSC/EOF)	------	1	1
		ENS Communicator (TSC)	------	1	------
Radiological Accident Assessment	Offsite Dose Assessment	RP Technician	1*	------	------
		Dose Projection Specialist (TSC/EOF)	------	1	1
	Offsite Surveys	FMT Monitor (TSC)	------	1	------
		FMT Lead	------	1	1
		FMT Member	------	1	1
	In-plant/Onsite (out-of-plant) Surveys	RP Technician	1	1	1
	Protective Actions	RP Technician	1	2	2
	RP Oversight	Rad Assessment Coordinator (TSC/EOF)	------	1	1
Plant System Engineering	Technical Support	Shift Technical Advisor (SRO/STA)	1	------	------
		Core Hydraulic Engineer (TSC)	------	1	------
		Electrical Engineer (TSC)	------	1	------
		Mechanical Engineer (TSC)	------	1	------
Repair and Corrective	Repair and Corrective Actions	MM Coordinator (OSC)	------	------	1
		EM Coordinator (OSC)	------	------	1
		I&C Coordinator (OSC)	------	------	1
		OSC Coordinator (OSC)	------	1	------
		RP Coordinator (OSC)	------	------	1
		Mechanical Personnel (OSC)	------	1	------
		Electrical Personnel (OSC)	------	1	------
		Instrument & Control Personnel (OSC)	------	------	1
Total			**6**	**18**	**14**

*May be performed by someone filling another position having functional qualifications

Figure B-1, TSC Organization

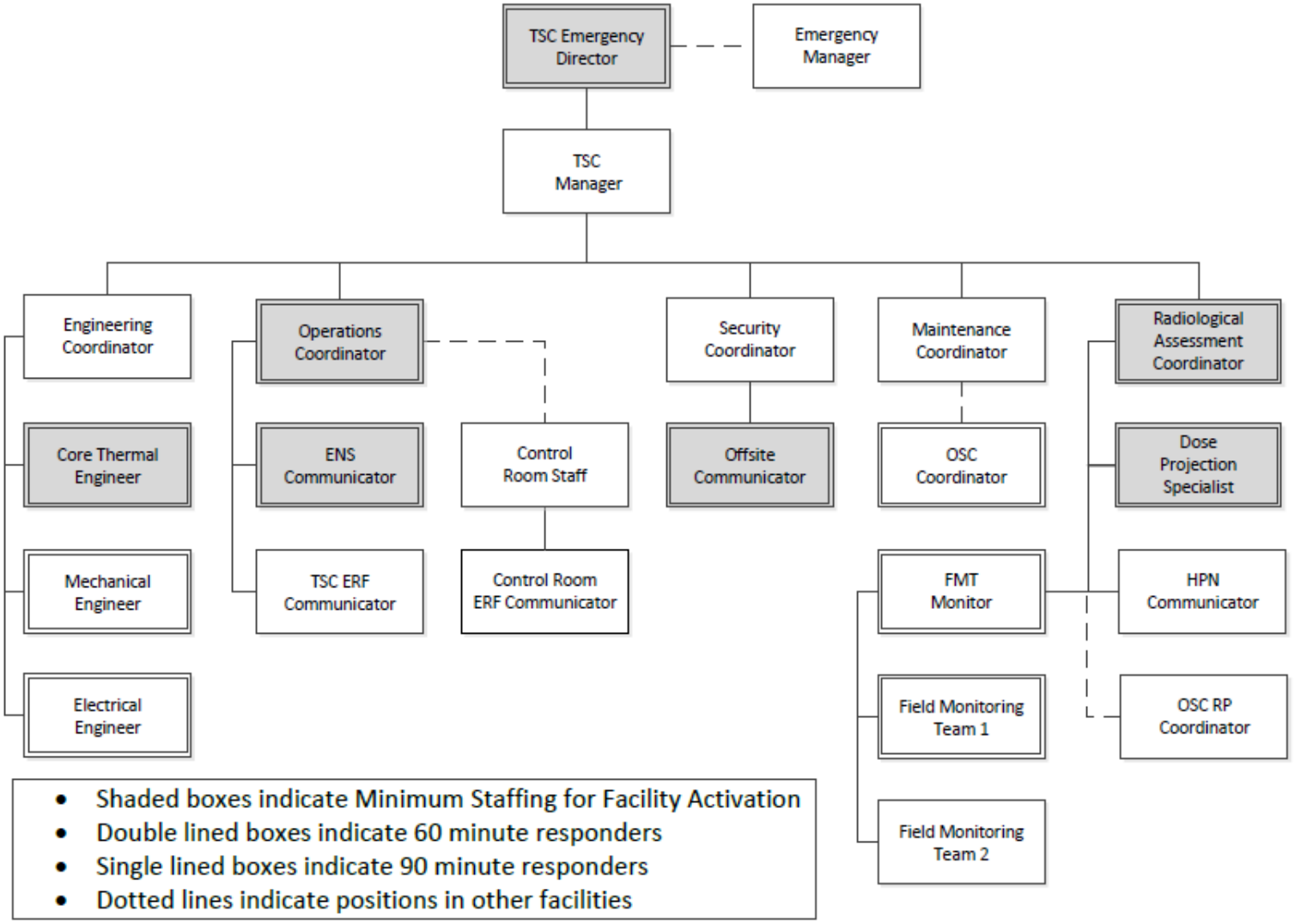


Figure B-2, OSC Organization

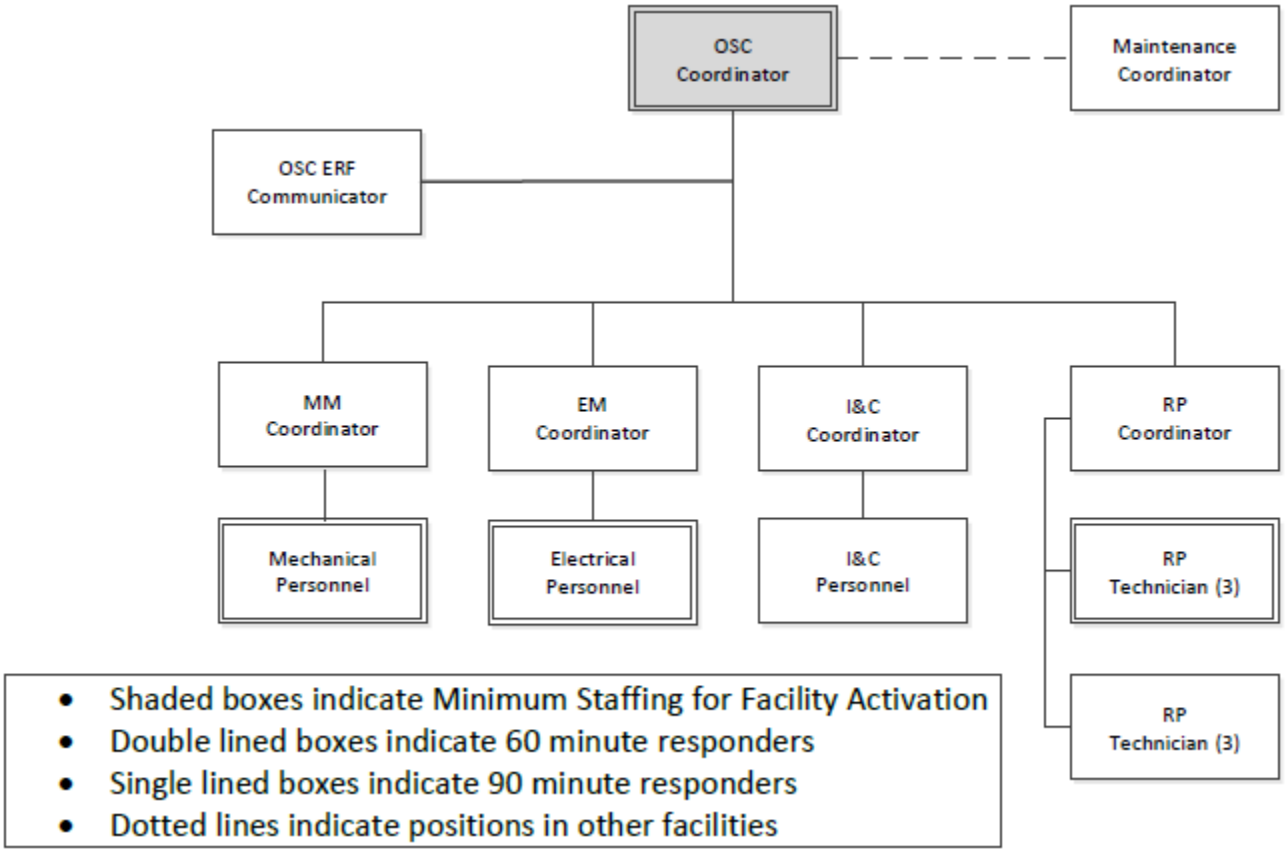


Figure B-3, EOF Organization

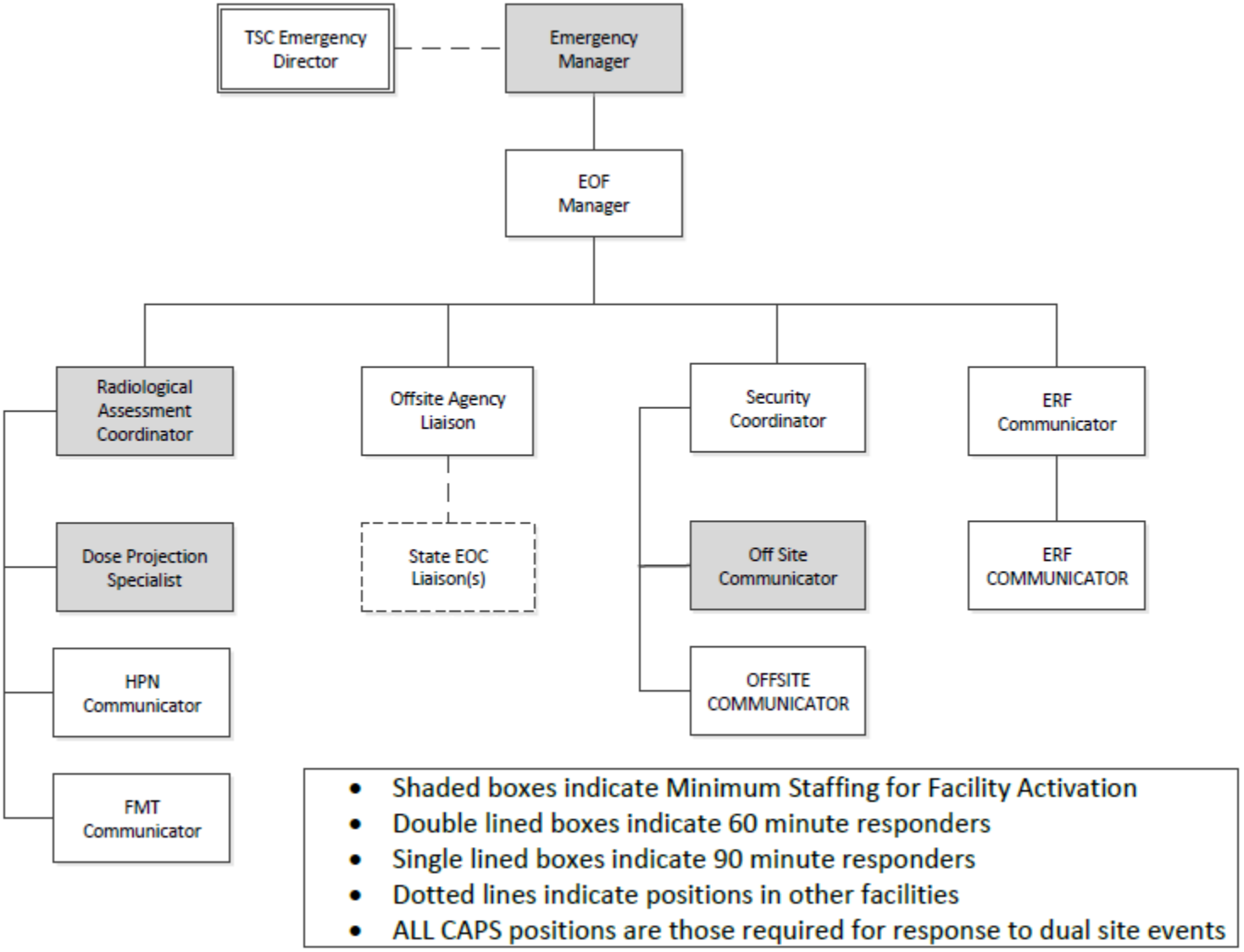
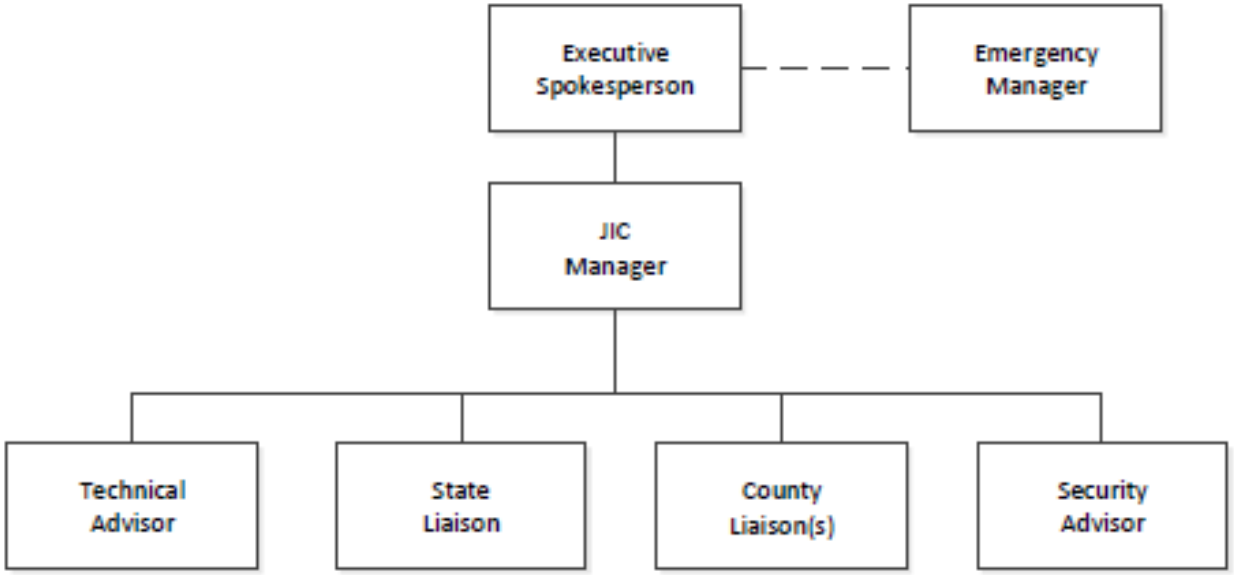


Figure B-4, JIC Organization



C. Emergency Response Support and Resources

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's EOF have been made, and other organizations capable of augmenting the planned response have been identified.

Regulatory References: 10 CFR 50.47(b)(3); 44 CFR 350.5(a)(3); 10 CFR Part 50, Appendix E.IV.A and E

C.1	Emergency response support and resources provided to the licensee's EOF, as agreed upon, are described

The Xcel Energy EOF contains dedicated work areas and resources for federal personnel.

C.2	Provisions made for additional emergency response support and resources are described and include the following

Memorandums of Understanding (MOUs) and/or LOAs have been developed between Xcel Energy and several entities to provide emergency response support and services consistent with this plan.

MOUs and LOAs are referenced by organization and title in element A.4 of the site-specific annexes. A contract/purchase order with a private contractor is considered acceptable in lieu of a MOU or LOA for the specified duration of the contract.

Written agreements have been developed which establish the extent of operations between Xcel Energy nuclear and other support organizations that have an emergency response role consistent with this plan. These agreements identify the emergency measures to be provided, the mutually accepted criteria for implementation, and the arrangements for the exchange of information. LOAs common to both sites include;

- Institute of Nuclear Power Operations (INPO)
- State of Minnesota, Department of Public Safety Division of Homeland Security and Emergency
- Regions Hospital
- Environmental Inc, Midwest Laboratory
- Department of Energy – REAC/TS
- North Memorial Health Care
- Pooled Equipment Inventory Co (PEICo)

The respective sites have obtained LOAs with private contractors and others who provide emergency support services. LOAs, as a minimum, state that the cooperating organization will provide its normal services in support of an emergency at the affected plant. LOAs are referenced in the site-specific Annexes and the actual letters are maintained in accordance with 10 CFR 50, Appendix E, IV.A.7.

C.2.a	The individual(s), by title/position, authorized to request emergency response support and resources from responding organizations

The individual authorized to request assistance and resources from responding organizations is the Emergency Manager who has overall authority for the Xcel Energy nuclear response.

Refer to element B.2.a, for greater detail regarding command & control.

C.2.b	(1) Each organization from which emergency response support and/or resources may be requested, (2) the circumstance(s) in which the emergency response support and/or resources would be required, (3) the process for requesting needed emergency response support and/or resources, (4) categories of capabilities and/or resources expected to be provided, (5) when the expected emergency response support and/or resources would be available once requested, and (6) how integration would occur.

Refer to elements A.1.a, and A.4 for the description and details of the provisions made for additional assistance and resources.

C.2.c	Coordination of NPP site access and support for external organizations that have agreed to provide requested emergency response support and resources

Site access is controlled by the Security organization in accordance with the site security plan and procedures. The TSC Security Coordinator is responsible for coordination with on-shift personnel when site access is needed for non-badged offsite agency and support personnel.

C.2.d	Agreements between licensees and local agencies for law enforcement, medical and ambulance services, fire, hospital support, and other support

Agreements with state and county response organizations have been established through the integrated development of their respective emergency plans.

Agreements with other entities have been formally developed and documented through memorandums of understanding (MOUs) and/or letters of agreement (LOAs).

OROs may be called to assist onsite for events requiring firefighting, medical, or law enforcement. Immediate assistance with firefighting, medical, law enforcement at the sites is initiated using the 911 emergency system. The coordination of these activities will be performed initially by CR personnel and subsequently by response personnel in the TSC or EOF when the facilities are activated.

If an event is of significant magnitude to require establishment of a near site Incident Command Post (ICP), the sites will provide liaison(s) to the ICP to assist in coordinating response efforts.

A list of applicable agreements is maintained in element A.4 of the site-specific annexes.

C.3	The capability of each principal organization to coordinate with other principal organizations leading the incident response is described

In addition to the coordination between the individuals in command and control of each organization, Xcel Energy personnel are dispatched to state or county EOCs as liaisons. The liaisons clarify information contained in emergency notifications and provide a communications link between the Xcel Energy and governmental emergency response facilities.

When NRC representatives are present at the EOF and/or TSC, coordination occurs directly between NRC and Xcel Energy nuclear personnel.

C. 4	Radiological laboratories, their general capabilities, and expected availability to provide radiological monitoring analysis services that can be used in an emergency are described. Plans to augment the identified radiological laboratories are described.

Onsite Laboratory

The onsite laboratory/counting rooms at Xcel Energy nuclear sites are the primary facility for radiation monitoring and analysis efforts. The onsite laboratory is the central point for receipt and analysis of onsite samples and includes equipment for chemical and radiological analyses. The plant laboratories have the capability of quantitative analysis of water and air samples, and qualitative analysis of terrestrial samples.

Additional facilities for counting and analyzing samples are available at the unaffected Xcel Energy nuclear site or using state and federal laboratory services. These laboratories can act as backup facilities if the affected site's counting room and laboratory become unusable or the capacity or capability of the site’s laboratory is exceeded.

Contract Laboratories

Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide environmental sample analysis services and are listed in the site-specific annexes.

C.5	Arrangements are described for integrating the licensee’s response with the NRC Headquarters and regional incident response centers and, when dispatched, the NRC’s site response team.

The TSC Emergency Director and the EOF Emergency Manager are the initial primary contact positions for the NRC site response team personnel sent to those facilities.

Xcel Energy nuclear sites have dedicated areas within the TSCs for NRC site response teams. Communications equipment, as well as instrumentation displays are available for use by the response teams.

Near site locations for NRC and other offsite agency staff are described in element H.3 of the site-specific annexes.

C.5.a	The activation process for the NRC's emergency response data system (ERDS) during an emergency is described.

ERO personnel will activate or confirm activation of ERDS as soon as possible but not later than one hour after declaring an alert or higher emergency classification level in accordance with 10 CFR 50.72(a)(4).

C.5.b	Provisions to continuously maintain open communications lines with the NRC, when requested, are described.

The Xcel Energy ERO is staffed for and capable of maintaining continuous communications with the NRC. When requested, open communication lines will be staffed by knowledgeable personnel to ensure efficient and effective information flow.

D. Emergency Classification System

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Regulatory References: 10 CFR 50.47(b)(4); 44 CFR 350.5(a)(4); 10 CFR Part 50 Appendix E.IV.B and C

D.1	A standard emergency classification and action level scheme is established and maintained. The scheme provides detailed EALs for each of the four ECLs in Section IV.C.1 of Appendix E to 10 CFR Part 50.

Xcel Energy has established and maintains a standard emergency classification and emergency action level scheme. The four ECLs are described as follows:

Unusual Event (UE)

Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.

Alert

Events are in progress, or have occurred, which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life-threatening risk to site personnel or damage to site equipment because of hostile action. Any releases are expected to be small fractions of the EPA Protective Action Guideline exposure levels.

Site Area Emergency (SAE)

Events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or hostile action that results in intentional damage or malicious acts; 1) toward site personnel or equipment that could lead to the likely failure of or; 2) that prevent effective access to, equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA PAG exposure levels beyond the site boundary.

General Emergency (GE)

Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or hostile actions that result in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA PAG exposure levels offsite for more than the immediate site area.

EAL schemes are site-specific and are documented in EAL Technical Basis Documents referenced in the site-specific annexes.

D.1.a	The EALs are developed using guidance provided or endorsed by the NRC that is applicable to the reactor design.

EALs at Xcel Energy nuclear sites have been developed in accordance with NEI 99-01 Revision 6, Development of Emergency Action Levels for Non-Passive Reactors. This guidance has been approved by the NRC and is applicable to the reactor design at Xcel Energy nuclear sites.

D.1.b	The initial emergency classification and action level scheme is discussed and agreed to by the licensee and OROs and approved by the NRC. Thereafter, the scheme is reviewed with OROs on an annual basis.

The emergency classification and EAL scheme has been agreed upon by state and county governmental authorities that support Xcel Energy sites.

Changes to the classification scheme or site-specific EALs are reviewed with the sites' respective state and county EPZ governmental authorities in advance of implementation.

D.2	The capability to assess, classify, and declare the emergency condition within 15 minutes after the availability of indications to NPP operators that an EAL has been met or exceeded is described.

Xcel Energy has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded.

The 15-minute time requirement to declare events will not be construed as a grace period to attempt to restore conditions to avoid declarations.

D.3	A summary of emergency response measures to be taken for each ECL is provided. The detailed emergency response measures are described in implementing procedures.

Xcel Energy maintains procedures that include immediate actions to be taken that are consistent with any declared ECL. Those procedures describe in detail required onsite protective actions, activation of the ERO when warranted, notification to the supporting state and county governmental agencies, and notification to the NRC.

Other notifications to plant management, corporate communications staff and any other supporting agency are also described in procedures.

A summary of emergency response measures for each ECL are detailed in Table D.3-1. Additional measures not listed may be taken based on event progression.

Table D.3-1: Matrix of Emergency Response Measures by ECL

Emergency Response Measure	Unusual Event	Alert	Site Area Emergency	General Emergency
Activation of ERO	NOTE	X	X	X
Notification to OROs and NRC	X	X	X	X
Site Assembly and Accountability			X	X
Site Evacuation			X	X
Protective Action Recommendation				X

NOTE: Activation of ERO at Unusual Event may occur at SM/ED discretion.

D.4	Emergency response measures based on the ECL declared by the licensee and applicable offsite conditions are described.

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

E. Notification Methods and Procedures

Procedures have been established for notification, by the licensee, of State and local response organizations and for notification of emergency personnel by all organizations; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway EPZ have been established.

Regulatory References: 10 CFR 50.47(b)(5); 44 CFR 350.5(a)(5)

E.1	The mutually agreeable process for direct and prompt notification of response organizations, aligned with the emergency classification and action level scheme, is described.

Xcel Energy, in coordination with state and county authorities, has developed methods and procedures for notification of offsite response organizations consistent with the emergency classification and EAL scheme. When an ECL is declared or upgraded, or changes are made to PARs, an initial notification will be performed within 15 minutes. The first notification is made to designated offsite agencies listed in the site annexes. If the states and counties choose to staff their EOC, notification messages could be received at those facilities. Receipt location of the notification messages is dependent on the applicable state and county procedures.

The state and county notification process is completed using a combination of electronic document transmittal and calls using commercial phone lines.

The initial notification to the NRC is made using the Emergency Notification System (ENS). If the ENS is inoperative, the required notification will be made using a backup means, such as an alternate commercial line, cell or satellite phone.

An accelerated call to the NRC will be made following discovery of an imminent threat or attack against a plant. The accelerated NRC notification will be completed after or concurrent with notification of local law enforcement agencies. The goal will be to initiate the notification within 15 minutes of discovery of an imminent threat or attack against a site. The information provided in the accelerated notification will be limited to the following:

- Site name.
- ECL if determined prior to the accelerated notification.
- Nature of the threat and the attack status

E.1.a	Provisions for notification of response organizations are established, including the means for verification of messages.

Xcel Energy nuclear sites initially notify state and county agencies listed in the site-specific annexes under the following conditions:

- The initial ECL declaration
- An upgrade to the ECL
- The issuance of, or change to, a PAR

This notification includes a means of verification or authentication. The authentication is accomplished in accordance with the offsite agency's specific emergency plans.

Follow-up messages are provided periodically to the appropriate offsite authorities. For long duration events with little change in information between messages, the follow-up message time interval can be increased as agreed upon by affected agencies.

Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.

E.1.b	The capability to notify responsible OROs within 15 minutes and the NRC within 60 minutes is described.

Xcel Energy nuclear sites notify responsible OROs within fifteen (15) minutes of event declaration.

The initial notification to the NRC is made using ENS immediately after notification to the states and counties, and not longer than 60 minutes of event declaration.

E.2	The alert and notification systems (ANS) used to alert and notify the general public within the plume exposure pathway EPZ and methods of activation are described. This description includes the administrative and physical means, the time required for notifying and providing prompt instructions to the public within the plume exposure pathway EPZ, and the organizations or titles/positions responsible for activating the system.

Xcel Energy Alert and Notification Systems (ANS) are described in site-specific annexes.

E.3	The licensee and state, local, and tribal government organizations establish the contents of the initial and follow-up emergency notifications to be sent from the NPP.

In conjunction with state and county authorities, Xcel Energy nuclear sites have established the content of the initial and follow-up notification messages to be used during an emergency. Initial notification will include the following:

- Site name
- ECL
- Release status
- PAR, if applicable

The content of the follow-up messages is detailed in implementing procedures.

E.4	Each organization establishes the contents of the initial and follow-up messages to the public including, as applicable, instructions for protective actions.

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

E.5	Provisions are made to provide timely supplemental information periodically throughout the radiological incident to inform the public.

State and county procedures provide for initial and follow-up messages to the public including instructions for protective actions, if required. Xcel Energy assists with establishment of appropriate instructions and message content.

F. Emergency Communications

Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

Regulatory References: 10 CFR 50.47(b)(6); 44 CFR 350.5(a)(6)

F.1	Each principal response organization establishes redundant means of communication and addresses the following provisions:
F.1.a	Continuous capability for notification to, and activation of, the emergency response network, including a minimum of two independent communication links.

Xcel Energy nuclear sites maintain the capability to perform emergency communications, notifying NRC and OROs, and activating the ERO. Communication systems are designed to facilitate normal and emergency communications within the plant, between the plant and emergency facilities, and between the plant and NRC and OROs. Redundant systems are provided to ensure continuous communications between entities and personnel. At least one system used for on-site communications and one system used for offsite communications is maintained with an alternate power source to ensure continuous availability.

Site communications capabilities are described in the site-specific annexes.

F.1.b	Communication with applicable organizations to include a description of the methods that may be used when contacting each organization.

Provisions exist for communications with state, county and tribal governments, NRC, and FMTs within the EPZs

Site communications capabilities are described in the site-specific annexes.

Telephones have been designated for the following NRC communications:

- NRC Emergency Notification System (ENS) – This communications line provides a link to the NRC Operations Center in Rockville, Maryland, and is used for initial notifications and continuous communications in a classified emergency.
- NRC Health Physics Network (HPN) – This communications line provides a link with the NRC to provide radiological information.

- NRC Reactor Safety Counterpart Link (RSCL) – This communications line provides a link for the NRC to conduct internal NRC discussions on plant equipment conditions separate from the licensee.
- Protective Measures Counterpart Link (PMCL) – This communications line provides a link for the NRC to conduct internal NRC discussions on radiological releases, meteorological conditions, and the need for protective actions.
- Management Counterpart Link (MCL) (Executive Bridge Line) – This communications line provides a communications link for any NRC internal discussions between the NRC Executive Team Director or Executive Team members and the NRC response team leader or top-level licensee management at the site.
- Security Bridge – This communications line provides a link to the NRC Security bridge Line for discussions between the NRC, site and EOF personnel.

Additional Methods of Communication

- Telephones
- Satellite phones
- Mobile Devices
- Radios
- Plant Page System
- ERDS

The available communications methods and their applicable locations are illustrated in Section F.1.b of the site-specific annexes.

F.1.c	Systems for alerting or activating emergency personnel in each response organization.

Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.

Alternate methods of ERO notification are in place via individual callouts of personnel utilizing any of the various calling methods available.

F.2	Systems for coordinated communication methods for applicable fixed and mobile medical support facilities are described.

Local medical facilities are listed in element L.2.b of the site-specific annexes.

Site communications capabilities are described in the site-specific annexes.

F.3	The testing method and periodicity for each communication system used for the functions identified in evaluation criteria E.2, F.1, and F.2 are described.

Communications tests will be conducted and documented on the frequency specified below. The tests include provisions to ensure participants in the test are able to understand the content of the messages in the test.

- Systems used to communicate with state and county government warning points within the plume exposure pathway EPZ will be tested monthly.
- Systems used to communicate from the MCR, TSC, and EOF to NRC Headquarters and NRC Regional Office Operations Center are tested monthly.
- Systems used to communicate with state and county government EOCs are tested annually.
- Systems used to communicate between Xcel Energy ERFs, and from the applicable ERF to the FMTs, are tested annually.
- Systems used to communicate with Federal emergency response organizations are tested annually.
- The ERDS is verified as connected and transmitting data on a quarterly basis.
- ANS testing frequency is described in site-specific annexes:

G. Public Education and Information

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency. The principal points of contact with the news media for dissemination of information during an emergency, including the physical location or locations, are established in advance, and procedures for coordinated dissemination of information to the public are established.

Regulatory References: 10 CFR 50.47(b)(7); 44 CFR 350.5(a)(7)

G.1	Provisions are made for a coordinated annual dissemination of information to the public within the plume exposure pathway EPZ, including transient populations and those with access and functional needs, regarding how they will be notified and what actions should be taken. The information is disseminated using multiple methods, to include non-English translations per current Federal Guidance.

Xcel Energy, in coordination with state and county emergency management personnel, updates and distributes site related emergency planning information annually to residents living within the plume-exposure pathway emergency planning zone (EPZ).

Xcel Energy, in coordination with state, county and local officials, annually provides the general public, including transients, with information concerning the methods of public notification and what individual actions should be taken during an emergency. This information may include:

- methods of public notification
- possible protective actions
- general information as to the nature and effects of radiation
- contact points for additional information
- special needs for the handicapped
- registration cards for the mobility impaired.

Methods for disseminating information may include brochures, annual publications, public postings, websites and/or meetings and lake access signs. Transient locations will be identified by state and county emergency management officials. These locations may include, but are not limited to, motels, hotels, marinas, and lake access areas. Dissemination of information to the public is coordinated with state and local agencies.

G.2	Methods, consistent with JIS concepts, are established for coordinating and disseminating information to the public and media. Plans include the physical location(s) for interacting with the media.

The State of Minnesota maintains a combined JIC/EOC for use by Xcel Energy and the State of Wisconsin. The JIC/EOC has sufficient space to allow interaction with the media. The JIC is staffed at an Alert or higher classification by Xcel Energy Corporate Communications personnel to ensure coordination with affected agencies and provide public information to the media and the public. The JIC provides the necessary structure and mechanism for organizing, developing, integrating, and delivering coordinated interagency messages via established plans, procedures, and strategies.

Corporate Communications personnel may provide public information at the Unusual Event declaration using social media in accordance with Joint Information System (JIS) precepts. Interactions with the media may occur at various locations and with various agencies depending on the extent of the response.

Various means are used to share information with the public and the media, such as media briefings in person or by phone, news conferences, social media posts, web posts, blogs, interactive voice response messages, news releases/updates/advisories, etc.

G.3	Organizations designate news media points of contact and a spokesperson(s) with access to necessary information

During the initial stages of an emergency, responses to media questions relative to plant status are typically provided by the corporate communications team. When the EOF is not activated, the normal Xcel Energy media interaction and news release process is followed.

When the EOF is activated, event response procedures are implemented for gathering and disseminating information. For scheduled news conferences and media briefings, the Executive Spokesperson will provide plant and event status and company information.

G.3.a	Arrangements are made for the timely exchange of information among the designated spokespersons representing the entities involved in incident response

Arrangements are made for the timely exchange of information among the designated spokespersons that use various means and technologies as agreed upon by the applicable agencies. Xcel Energy will provide information and updates to address the emergency event to include plant conditions and associated response actions. States and counties will address public response and actions.

G.4	Organizations establish coordinated arrangements for identifying and addressing public inquiries and inaccurate information

A Corporate Communications liaison will work with state, county and federal public information officers to acknowledge rumors and determine the origin. A coordinated response will be made to address rumors or correct misinformation.

G.5	Organizations conduct programs to acquaint news media with the emergency plans at least annually

The Xcel Energy Communications Department has communications procedures to ensure prompt communications between Xcel Energy and principal media organizations.

At least once a year, both states will conduct training programs or send mailings to acquaint the news media with the emergency plans and to provide information concerning radiation and points of contact for release of public information in an emergency. Xcel Energy has input to this process.

H. Emergency Facilities and Equipment

H.1	A TSC is established, using current Federal guidance, from which NPP conditions are evaluated and mitigative actions are developed.

The TSC provides a location to house personnel who are responsible for management and technical support of plant operations during emergency conditions. The TSC also functions to relieve the on-shift personnel of peripheral duties and communications not directly related to reactor system manipulations and preventing congestion in the MCR.

Each Xcel Energy nuclear site has a dedicated TSC for use during emergency situations to implement emergency actions and analyze and mitigate accident conditions. The TSCs are sized to accommodate ERO responders and NRC representatives. State and county personnel are not expected to report to the TSC.

The TSC is activated within 60 minutes following the declaration of an Alert or higher classification. TSC activation at the Unusual Event emergency classification level is optional. Site-specific details of the TSC are described in the site-specific annexes.

H.2	An OSC is established, using current Federal guidance, from which repair team activities are planned and teams are dispatched to implement actions.

The OSC provides a location where plant maintenance, operations, radiation protection and other plant emergency support personnel will assemble and stand by to assist as needed.

Each Xcel Energy nuclear site has an OSC that provides an area for coordinating and planning event response activities and for staging personnel and equipment.

The OSC is activated within 60 minutes following the declaration of an Alert or higher classification. OSC activation at the Unusual Event emergency classification level is optional.

Site-specific details of the OSC are described in the site-specific annexes.

H.3	An EOF is established, using current Federal guidance, as the primary base of emergency operations for the licensee during a radiological incident. The EOF facilitates the management and coordination of the overall emergency response, including the sharing of information with Federal, state, local and tribal government authorities.

The EOF is a dedicated facility located in conjunction with Xcel Energy's general offices in Minneapolis and serves as the EOF for Xcel Energy nuclear sites. Access to the EOF is controlled using electronic card readers.

The EOF has the capability to display vital plant data and radiological information for each site and unit, in near real time, to be used by knowledgeable individuals responsible for providing technical briefings on plant conditions, event prognosis, and for management of overall emergency response.

The EOF provides reliable voice communications to each site's MCR, TSC, OSC, the NRC, and state and county warning points and EOCs.

The EOF is required to be activated within 90 minutes following the declaration of an Alert or higher classification.

H.3.a	For an EOF that is located more than 25 miles away from the NPP site, provisions are made from locating NRC and offsite responders closer to the NPP site.

The EOF is greater than 25 miles from MNGP and PINGP. Xcel Energy maintains space for members of an NRC Site Team and federal responders at a location near those sites. The location and provisions of the near-site facilities is described in the site-specific annexes.

H.4	An alternative facility (or facilities is established, using currently provided and/or endorsed guidance, which would be accessible even if the NPP site is under threat of or experiencing hostile action.

An Alternative Emergency Facility for staging of ERO personnel has been designated for each Xcel Energy nuclear site and serves as a location for TSC and OSC personnel should those facilities become uninhabitable or in the cases where the facilities cannot be accessed such as a hostile action or natural disaster. The location of the Alternative Emergency Facility for each site is provided in the site-specific annexes.

H.5	A JIC is established, and its location is identified, to coordinate communication from Federal, state, local, and tribal government authorities and licensee personnel with the public and media.

Refer to Section G for details regarding the Xcel Energy JIC and JIS.

H.6	Each organization establishes an emergency operations center (EOC) for use in directing and controlling response functions and provides for timely EOC activation. For an EOC located within the plume exposure pathway EPZ, an alternate EOC, or location outside the plume exposure pathway EPZ, is identified to continue response functions in the event of an evacuation.

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

H.7	Onsite monitoring systems used to initiate emergency response measures in accordance with the emergency classification scheme, as well as those to be used for conducting assessment, are identified. Monitoring systems consist of geophysical phenomena monitors, including meteorological, hydrologic, and seismic instrumentation; radiation monitors and sampling equipment; plant process monitors; and fire, toxic gas, and combustion products detectors.

Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).

A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities.

Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.

H.8	Provisions are made to acquire data from offsite monitoring and analysis equipment, including data on geophysical phenomena (e.g., meteorological, hydrologic, and seismic monitors) and radiological data (e.g., from FMTs, environmental dosimeters, and laboratory analyses.

Meteorological Monitoring

Meteorological information from offsite sources can be obtained from the National Weather Service. Xcel Energy can contact the National Weather Service to obtain additional synoptic scale weather data and compile a site-specific atmospheric diffusion assessment for each Xcel Energy nuclear site.

Seismic Monitoring

Seismic information from offsite sources can be obtained from the National Earthquake Information Center. A considerable array of seismometers is in the region. A central point of contact to obtain information about a seismic event is the USGS.

Radiological Monitoring

Offsite monitoring programs and processes that include the use of fixed dosimetry and air sampling capability are developed within the Radiological Environmental Assessment Program (REMP) at each site as described in the site-specific Offsite Dose Calculation Manual (ODCM).

H.9	Organizations directly responsible for offsite radiological monitoring provide for radiological monitoring equipment. This includes equipment that is located or stored near the NPP site, as well as additional equipment that may be brought to the site.

Each Xcel Energy nuclear site maintains a sufficient supply of emergency equipment to be used for environmental monitoring. Additional offsite radiological monitoring equipment and resources are available from the other Xcel Energy nuclear site.

H.10	Instrumentation is provided to obtain current meteorological information. Additional provisions are made to obtain representative meteorological information from other sources as needed by the NPP's radiological assessment models for site-specific characterization of plume dispersion and transport. Meteorological information is provided to the control room, TSC, EOF (or backup EOF), and NRC (via ERDS).

Refer to element H.7 for a description of the onsite meteorological monitoring capabilities.

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.

The ERDS will supply the NRC with selected meteorological data points on a near real time basis. The selected ERDS data points are transmitted via Virtual Private Network (VPN) to the NRC at approximately 1-minute intervals.

Meteorological parameters used for input into the site-specific URI dose assessment model are described in the site-specific URI Site Annex documents.

H.11	Provisions are made to ensure that emergency equipment and supplies are tested, maintained, and available in sufficient quantities, to include reserves and replacements, when needed. This includes:

In addition to supplies of normal use equipment and instruments, emergency kits are maintained at Xcel Energy nuclear sites. Routine quarterly inventories are performed to verify contents and operationally check equipment/instruments in accordance with site procedures.

Sufficient reserves of instruments and equipment are maintained to replace those removed from emergency kits or lockers for calibration or repair.

H.11.a	Identification of the organization(s) responsible for the testing and maintenance of emergency equipment

Radiation Protection is responsible for the maintenance and storage of radiological equipment and instruments.

H.11.b	Calibration and operational checks of emergency equipment per national standards or the manufacturer's instructions, whichever is more frequent.

Requirements to calibrate emergency equipment and instruments are specified in site or fleet procedures.

H.12	Emergency kits are identified by general category. Contents and quantity of each emergency kit are specified in the emergency plan or other document(s) referenced in the emergency plan.

Emergency kits may be assembled for radiation protection, field monitoring, first aid or other emergency use needs based on location and availability at each site.

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.

Site count rooms are the primary location for receipt and analysis of FMT samples. Sampling and analysis equipment are available for quantitative activity determination of liquid and air samples, and qualitative activity determination of terrestrial samples.

I. Accident Assessment

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

Regulatory References: 10 CFR 50.47(b)(9); 44 CFR 350.5(a)(9)

I.1	Capabilities for performing radiological assessment for all reactor core and spent fuel pool sources, individually and collectively, including response to events occurring simultaneously at all units on the NPP site, are described. These capabilities include
I.1.a	Methods for determining the magnitude and isotopic composition of an ongoing release of radioactive material through waterborne or airborne release pathways, or estimating these parameters for a potential release

The magnitude of a release of radioactive material to the environment is primarily identified directly by effluent monitors. Survey and sample analysis may also be used to determine the magnitude of a release. Indirect means such as core damage estimates and release pathway assumptions may be used to estimate the magnitude of a release of radioactive material.

The isotopic composition of a release of radioactive material to the environment may be determined by; (1) specialized gaseous monitors that distinguish between gases, iodines and particulate, (2) survey and sample analysis, or (3) source term estimates based on core damage and release pathway assumptions.

Dose assessment model methods are capable of estimating source term and magnitude of gaseous releases from effluent monitors or plant parameter data and release rate projections.

I.1.b	A radiological assessment model for airborne releases that provides estimates of offsite radiation exposures and contamination levels using a dispersion model that is representative of the plant release points, topographical features, and meteorological regimes at the NPP site

Xcel Energy uses site-specific versions of the Unified RASCAL Interface (URI) off-site dose projection computer model. The underlying dose assessment

model in URI is the NRC RASCAL 4 model, based on the methods and equations documented in NUREG-1940.

The URI model provides off-site radiological dose and dose rate estimates based on near real time or hypothetical inputs. Projected dose is based on EPA-400 dose conversion factors and provided as; (1) the total effective dose equivalent, or TEDE (the sum of the effective dose equivalent from immersion, 4 days of ground deposition, and the committed effective dose equivalent from inhalation), and (2) the committed dose equivalent to the thyroid (CDE thyroid).

URI dose projection results are given for various locations from the site boundary to 10 miles. URI can provide dose assessment results for multiple release points from the site.

URI dose projection results and field monitoring readings are used in assessing radiological EALs and PARs.

The URI/RASCAL program may be run from terminals that are located in the Control Room, TSC, and EOF. Back-up capabilities are provided by stand-alone laptop computers using manual data entry for meteorology.

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

On-site/out of plant environmental monitoring is performed by site radiation protection personnel under the direction of the OSC RP Coordinator.

Off-site environmental monitoring is performed by qualified field monitoring team personnel under the direction of the TSC Field Team Monitor.

FMTs are provided vehicles and equipment for environmental surveys. Field monitoring surveys and sampling may be performed at pre-identified locations or other geographic locations within the EPZ determined during the event. FMTs are directed to track the radioactive plume by monitoring radiation levels and by obtaining and analyzing air samples. Samples taken by the FMTs will be further evaluated by one of the available laboratory facilities described in elements C.4 and site-specific annexes.

I.2	Methods for assessing contamination of drinking water by waterborne releases for sites located on bodies of water from which public drinking water is drawn.

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

I.3	The capability and responsibility for monitoring the following parameters, which provide input to radiological assessments during an emergency, are described: 1. Status of reactor fuel (e.g., no fuel damage, technical specification activity, clad failure, core melt). 2. Status of containment integrity. 3. Leakage of radioactive material from plant systems, structures, and components. 4. Status of engineered safety features used to mitigate the release of radioactive material to the environment (e.g., filters, containment spray, etc.). 5. Onset and duration of an actual release of radioactive material to the environment or estimating these parameters for a potential release.

The Xcel Energy ERO monitors plant parameters using information provided by plant data transmittal systems to assess the status of reactor fuel using core damage assessment procedures.

The ERO also monitors plant data transmittal systems to evaluate the status of containment integrity, systems used to mitigate the release of radioactive material to the environment and to identify leakage of radioactive material from plant systems, structures, and components.

By observing effluent and process monitors, the onset and duration of an actual release of radioactive material to the environment can be determined, or these parameters estimated for a potential release.

I.4	The methods and responsibility for determining the source term present in reactor coolant, containment atmosphere, and spent fuel pool area atmosphere are described

Source term present in reactor coolant, containment atmosphere, and spent fuel pool area atmosphere are estimated using effluent, process and area radiation monitor readings, comparison of plant conditions against design basis event scenarios, sample analysis and environmental survey results, and plant parameter indications as inputs into the dose assessment and core damage assessment processes.

I.4.a	The contingency arrangements to obtain and analyze highly radioactive samples from the reactor coolant system, containment atmosphere and sump, and spent fuel pool storage area are described

Details on the sampling of highly radioactive systems are outlined in site Technical Specifications and implemented by Chemistry procedures outside of the SEP and Site Annexes.

I.5	The organizations responsible for FMT activities, and necessary resources, are identified.

Responsibility for state FMT personnel remains with state ORO and responsibility for Xcel Energy FMT personnel remains with Xcel Energy ERO.

Xcel Energy FMT activities are coordinated with environmental monitoring efforts performed by state directed teams as appropriate for the site.

I.6	Each organization, where appropriate, provides methods, equipment, and expertise to make timely assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways, including development of post-plume PARs for comparison to current Federal guidance.

Xcel Energy uses an industry recognized dose assessment code to make timely assessments of the actual or potential magnitude and locations of any radiological hazards through gaseous release pathways. Personnel qualified in dose assessment are available on-shift, in the TSC and the EOF. Dose assessment results and field monitoring readings assist in evaluating appropriate ECLs based on radiological EALs and developing any related PARs.

The immediate onsite magnitude and consequences of liquid releases regarding event classification are primarily determined by liquid effluent monitors and direct area surveys.

Post-plume protective actions are developed by OROs and described in state and county radiological emergency plans. Xcel Energy FMT and laboratory personnel may assist ORO decision making with sample collection and analysis using established procedures and protocols.

I.7	The capability to detect and measure radioiodine concentrations in air in the plume exposure pathway EPZ as low as 10^{-7} µCi/cc (microcuries per cubic centimeter) under field conditions is described. The sample collection process takes into account the sample flow rate, collection efficiency of the sample media used to collect the sample, duration of the sample, counter efficiency, and background radiation, including interference from the presence of noble gases

Xcel Energy field monitoring equipment has the capability to detect and measure airborne radioiodine concentrations as low as 1E-7 µCi/cc in the presence of noble gases. Air samples will be taken with portable air sampling equipped with a Silver Zeolite or equivalent cartridge and particulate filter. Interference from the presence of noble gas and background radiation is minimized by ensuring that monitoring teams move to areas of low background prior to analyzing the sample cartridge.

Air sample results can be estimated in the field. The samples can be analyzed for greater precision by one of the available laboratory facilities described in elements C.4 and site-specific annexes.

I.8	A means is established for relating the various measured parameters (e.g., exposure rates, contamination levels, and air activity levels) to dose or dose rates. Provisions are made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with current Federal guidance. In addition, provisions are established to validate dose projections with field data and compare projections with other organizations also calculating dose projections. The detailed provisions are described in implementing procedures.

Xcel Energy FMTs will track the plume from any radiological release by monitoring radiation levels as indicated on radiological measuring instruments and by obtaining and analyzing air samples. Environmental survey and air sample results are compared with dose assessment results to validate or adjust projections. Additionally, results can be input into the Xcel Energy URI dose assessment model to develop projections at various locations.

I.9	Arrangements to locate and track the airborne radioactive plume are made using available resources, which includes Federal, state, local, and tribal governments, and/or licensee resources. Provisions are made to characterize the plume including taking peak plume measurements. Identification of the plume includes determining a measurement that is high enough to be reasonably above background radiation readings and sufficient enough to indicate submersion within the plume.

Xcel Energy provides vehicles and equipment for the FMTs. Methods to monitor a radioactive plume include establishing peak centerline values and edges. Monitoring strategies may include the traversing of plumes when road networks and exposure rates permits. Additionally, local field sampling and monitoring points are specified to support pre-positioning of teams or use in comparison with dose projection results.

Xcel Energy personnel coordinate environmental radiological monitoring and assessment efforts with state directed teams as appropriate for the site.

Support from the DOE Radiological Assistance Team can be requested by Xcel Energy or the states.

I.10	Organizations directly responsible for radiological monitoring, analysis, and dose projections describe the capability for coordinating monitoring efforts, tracking and trending data, and sharing analytical results with other organizations performing radiological assessment functions

Xcel Energy personnel coordinate environmental radiological monitoring and assessment efforts with state assessors as appropriate for the site.

J. Protective Response

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. ETEs have been developed by applicants and licensees. Licensees shall update the ETEs on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

Regulatory References: 10 CFR 50.47(b)(10); 44 CFR 350.5(a)(10)

J.1	The means and time required to alert, notify, and provide a range of protective actions for onsite individuals and individuals who may be in areas controlled by the licensee (including members of the public) during a radiological incident are described.

Alarms are available for alerting personnel of hazardous conditions such as fire or increasing radiation levels at the site. Site communications methods are available for notification of personnel outside the Protected Area and within the Owner Controlled Area. Instructions are provided to plant personnel that describe the protective action to be taken in each instance.

The implementing procedures describe the assembly areas for personnel on-site.

The implementing procedures also describe provisions made to alert personnel in high noise areas and outbuildings within the Protected Area and within the Owner Controlled Area.

J.1.a	Provisions are made for evacuation of onsite non-essential personnel at an SAE or General Emergency (GE).

Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager.

Transportation offsite includes use of personnel vehicles and company vehicles if needed.

J.2	Provisions are made and coordinated with appropriate offsite entities for evacuation routes and transportation for onsite individuals to a suitable offsite location. Selection of location considers the potential for inclement weather, high traffic density, and potential radiological conditions. Alternate location(s) and route(s) are identified.

Evacuation routes, transportation and relocation areas are described in the site-specific annexes.

J.3	Provisions for radiological monitoring and decontamination, if necessary, of personnel evacuated from the NPP site are described.

Requirements for radiological monitoring of personnel evacuated from the site are contained in Section L and address appropriate actions for any known or suspected overexposures or contamination. Details on the decontamination of evacuees are in Radiological Protection Procedures.

J.4	The capability to account for all individuals inside the NPP Protected Area following declaration of an SAE or GE is described. The names of missing individuals are ascertained within 30 minutes following the emergency declaration and accountability is maintained for the duration of the incident. This capability includes provisions for prompt accountability following events that may preclude completion within 30 minutes (e.g., hostile action).

Assembly and accountability is conducted following the declaration of a Site Area or General Emergency, or at the discretion of the Emergency Director and is initiated via site assembly announcement.

Accountability of personnel within the Protected Area is accomplished within 30 minutes following emergency declaration and maintained continuously thereafter as described in the Security Plan. Accountability may be delayed during a security event if the Emergency Director, in consultation with Security, determines that performing accountability could be detrimental to the safety of plant personnel. If accountability is delayed, then accountability will be performed as soon as conditions permit.

J.5	Provisions are made for personal radiological protection for individuals arriving or remaining onsite during the incident.

Onsite protective actions for routine and emergency conditions are detailed in the plant's Radiation Protection Program. During an emergency, protective actions would be taken to minimize radiological exposures or contamination affecting onsite personnel. A range of protective actions applicable to site personnel include:

- Assembly/Accountability
- Site Evacuation
- Issuance of KI

Each site maintains an inventory of equipment and potassium iodide (KI) available for use by emergency workers. The Emergency Director has the responsibility for approval of issuing KI to site emergency workers.

Additionally, a duck and cover protective action of may be used in response to security related events.

Implementing procedures provide specific protective actions to take during hostile action or severe weather events.

J.6	The basis and methodology are established for the development of PARs for the responsible OROs, including evacuation, sheltering, and, if appropriate, radioprotective drug use, for the plume exposure pathway EPZ. Current Federal guidance is used.

PARs for preventing or minimizing exposure to the public and are based on Environmental Protection Agency (EPA) 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents and NUREG-0654, Revision 1, Supplement 3. PARs are provided to the offsite agencies responsible for implementing protective actions for the public within the 10-mile EPZ. Protective actions that can be recommended to the state and counties include the following:

- Evacuation.
- Shelter in place.
- Thyroid blocking agent in accordance with state plans and policy.

Additional precautionary protective actions for PINGP are included in the site-specific annex.

PAR decision-making flowcharts are site-specific in nature and are provided in implementing procedures. Sites have the capability to provide state and local agencies an ad hoc PAR for beyond the 10-mile EPZ.

J.7	A site-specific protective action strategy or decision-making process, informed by the ETE study, is coordinated between the licensee and OROs. Current Federal guidance is used.

Plant conditions, projected dose and dose rates and field monitoring data are communicated to offsite agencies responsible for dose assessment/PARs to assist them in developing parallel assessments.

Site-specific protective action strategies, informed by the site-specific ETEs, have been developed using guidance provided in NUREG-0654. Rev 1. Supplement 3, Guidance for Protective Action Strategies, in coordination between Xcel Energy and the site-specific Offsite Response Organizations (OROs) and are included in implementing procedures.

J.8	The latest ETEs are:
J.8.a	Incorporated either by reference or in their entirety into the emergency plan.

Refer to the site-specific annexes for reference to ETEs.

ETE analyses are maintained as described in element P.4.

J.8.b	Incorporated either by reference or as a summary of the latest ETE analysis into the emergency plan.

T*his element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.*

J.9	PARs are provided, in a timely manner, directly to the designated ORO(s) responsible for making protective action decisions (PADs) within the plume exposure pathway EPZ.

Applicable plume exposure pathway EPZ PARs are developed at the General Emergency classification level and provided to the ORO personnel responsible for making protective action decisions as noted in element E.1

Prior to ERF activation, the SM/ED is responsible for making these notifications. Following ERF activation, the TSC Emergency Director and subsequently the EOF Emergency Manager assumes the responsibility for PAR notification.

PARs are communicated using the initial notification form and process. See section E for a discussion of emergency notification.

J.10	Plans include maps, charts, or other information that demonstrate the following for the plume exposure pathway EPZ:
J.10.a	Evacuation routes, evacuation areas, reception centers in host areas, and shelter areas.

Maps and other information showing site-specific evacuation routes, evacuation areas, reception centers in host areas, and shelter areas are contained in the ETE study reports as noted in the site-specific annexes.

J.10.b	Population distribution around the NPP site by evacuation areas.

Maps and other information showing population distribution around each Xcel Energy nuclear site, by evacuation area, are contained in the ETE.

The following elements are not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

J.11	A capability for implementing protective actions based on current Federal guidance is established. The process ensures coordinated implementation of PADs with all appropriate jurisdictions. The process for implementing protective actions for the plume exposure pathway EPZ is described and includes the following:

J.11.a	Means for identifying and protecting residents who would have difficulty in implementing protective actions without assistance. This includes those with access and functional needs, transportation-dependent residents, those in special facilities, and those in correctional facilities. These means include notification, support, and assistance in implementing protective actions where appropriate.

J.11.b	The decision-making methodologies for use of radioprotective drugs and the provisions for administration to the general public, emergency workers, and institutionalized persons within the plume exposure pathway EPZ. This includes the means of determining quantities, maintaining and managing supplies, communicating recommendations, and distributing.

J.11.c	Means of evacuation informed by the updated ETEs. The evacuation routes and transportation resources to be utilized are described and include projected traffic capacities of evacuation routes and implementation of traffic control schemes during evacuation.

J.11.d	The locations of pre-identified reception centers beyond the boundaries of the plume exposure pathway EPZ, organizations responsible for managing reception centers, arrangements for handling service animals and pets, and provisions for radiological monitoring/decontamination.

J.11.e	Means for the initial and ongoing control of access to evacuated areas and organizational responsibilities for such control, including identifying pre-selected control points.

J.11.f	Identification of and means for dealing with potential impediments to the use of evacuation routes (e.g., seasonal impassability of roads) and contingency measures. The resources available to clear impediments and responsibility for re-routing traffic, as necessary, are described.

J.11.g	Identification of and means to implement precautionary protective actions (e.g., actions taken at an SAE).

J.12	Protective actions to be used for the ingestion exposure pathway EPZ are specified, including the methods for protecting the public from consumption of contaminated foodstuffs, and are based on current Federal guidance.

J.13	The means for registering, monitoring, and decontaminating evacuees, service animals, pets, vehicles, and possessions at reception centers in host areas are described. The personnel and equipment available are capable of monitoring 20 percent of the plume exposure pathway EPZ population, including transients, assigned to each facility within a 12-hour period.

J.14	General plans for the removal or continued exclusion of individuals from restricted areas are developed. Relocation plans include:

J.14.a	Process for implementing current Federal guidance for relocation.

J.14.b	Means to identify and determine the boundaries of relocation areas, including a buffer zone.

J.14.c	Prioritization of relocation based on projected dose to an individual and the timeframe for relocation.

J.14.b	Means to identify and determine the boundaries of relocation areas, including a buffer zone.

J.14.d	Control of access to and egress from relocation areas and security provisions for evacuated areas.

J.14.e	Contamination control during relocation.

J.14.f	Means for coordinating and providing assistance during relocation.

K. Radiological Exposure Control

Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

Regulatory References: 10 CFR 50.47(b)(11); 44 CFR 350.5(a)(11)

K.1	The radiation protection controls for emergency workers to be implemented during emergencies are described. These controls address the following aspects:

K.1.a	Onsite emergency exposure guidelines for emergency workers consistent with their assigned duties and current Federal guidance and the conditions under which the guidelines apply

Plant management approval is required before emergency workers are allowed to exceed the maximum administrative radiation dose.

The Emergency Director has responsibility for authorizing personnel exposure levels under emergency conditions using the guidance in Environmental Protection Agency (EPA) 400-R-92-001, “Manual of Protective Action Guides and Protective Actions for Nuclear Incidents.

Table K.1-a – Emergency Worker Dose Limits

Dose (TEDE)	Applicability	Conditions
5 rem	All	N/A
10 rem	Protecting valuable property or equipment	Lower dose not practicable
25 rem	Lifesaving or protection of large populations	Lower dose not practicable
>25 rem	Lifesaving or protection of large populations	Only on a voluntary basis to persons fully aware of the risks involved

K.1.b	The capability to evaluate emergency worker dose (i.e., the sum of the effective dose equivalent and the committed effective dose equivalent) at the time of exposure when direct measurement is not feasible.

Emergency worker dose when direct measurement is not feasible will be determined by the sum of the effective dose equivalent and the committed effective dose equivalent.

K.1.c	The capability to monitor and assess the radiation doses received by emergency workers for the duration of the incident.

Personnel monitoring equipment is issued to and worn by personnel as required in 10 CFR 20 and RP procedures as a record of radiation exposure. Other radiation detection devices are available for use by emergency workers to allow real time measurement of exposure.

K.1.d	The capability to implement onsite contamination control measures.

Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.

K.1.e	The capability to decontaminate emergency workers, equipment, and vehicles.

Guidelines as established in radiation protection procedures will be used to determine action levels for decontamination. Radiation protection procedures have been established for decontamination of emergency workers and equipment. The means for disposal of contaminated waste are also established.

K.1.f	Appropriate radiation protection briefings for repair teams that are being dispatched into the plant and FMTs being sent onsite and offsite, the scope of which is consistent with the expected risk to the team.

Emergency response teams, including FMTs, that must enter areas where they might be expected to receive higher than normal doses will be briefed on the task assigned, risks associated with the task, the planned route to destination, allowed dose and dose rates, stay time, protective clothing/equipment and other hazards or conditions as applicable.

K.1.g	The process for NPP site access and dosimetry issuance to personnel from OROs arriving to assist with the onsite response.

ORO personnel supporting on-site activities will be issued dosimetry and/or be monitored by radiation protection personnel when responding to areas where exposure could occur. This process will be implemented by radiation protection and site security personnel.

K.2	Individual(s) who can authorize personnel to receive radiation doses in excess of the occupational dose limits in accordance with the minimum standards set forth in 10 CFR Part 20 or 29 CFR 1910.1096, as applicable to the organization, are identified by title/position. Such authorizations are documented.

The Emergency Director may authorize emergency workers to receive doses in excess of the occupational dose limits set forth in 10 CFR 20.

K.2.a	The process for allowing onsite volunteers to receive radiation exposures in the course of carrying out lifesaving and other emergency activities is described.

Personnel dispatched into radiation areas or areas of unknown radiation levels are briefed on the task and environmental conditions and are provided appropriate monitoring and personnel protective equipment. Decisions to accept doses in excess of occupational limits are on a volunteer basis and prospective volunteers shall be made aware of the risks.

Refer to element K.1.a., for appropriate emergency exposure limits.

The following elements are not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

K.2.b.	The process for authorizing emergency workers to incur exposures that may result in doses in excess of the current Federal guidance is described

K.3	The capability to determine the doses received by emergency workers involved in any commercial NPP radiological incident is described. Each organization makes provisions for distribution of direct-reading dosimeters (DRDs) and permanent record dosimeters (PRDs).

K.3.a	Provisions to ensure that DRDs are read at designated intervals and dose records are maintained for emergency workers are described.

K.4	Action levels for determining the need for decontamination are specified and the means for radiological decontamination are established for emergency workers and the general public, as well as equipment, vehicles, and personal possessions. The means for disposal of contaminated waste created by decontamination efforts are also established.

L. Medical and Public Health Support

Arrangements are made for medical services for contaminated injured individuals.

Regulatory Reference: 10 CFR 50.47(b)(12); 44 CFR 350.5(a)(12)

L.1	Arrangements are established with primary and backup hospitals (one hospital is located outside the plume exposure pathway EPZ) and medical services. These facilities have the capability for evaluation of radiation exposure and uptake. The persons providing these services are adequately trained and prepared to handle contaminated, injured emergency workers and members of the general public.

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

L.2	Arrangements for the medical treatment of contaminated, injured onsite personnel and those onsite personnel who have received significant radiation exposures and/or significant uptakes of radioactive material are described. These arrangements include the following components:

Refer to element L.2.e for arrangements for personnel who have received significant radiation exposures and/or significant uptakes of radioactive material.

L.2.a	An onsite first aid capability with adequate medical equipment and supplies.

First aid capability is maintained as part of the site's administrative procedures.

L.2.b	Primary and backup offsite medical facilities.

Arrangements have been made with local hospitals for the medical treatment of contaminated injured personnel.

Primary and backup offsite medical facilities to treat contaminated injured personnel are described in the site-specific annexes.

L.2.c	Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas.

Xcel Energy personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Hospitals are equipped and hospital personnel trained to address contaminated injured individuals and basic training on the nature of radiological emergencies. Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.

L.2.d	Provisions to evaluate for radiological contamination either prior to transport to a medical facility or after arrival.

Injured personnel are evaluated for radiological contamination prior to transport to a medical facility in accordance with radiation protection procedures.

L.2.e	Contact information for facilities capable of treating overexposure to radioactive material.

Contact of the Radiation Emergency Assistance Center/Training Site (REAC/TS) is maintained per LOA.

L.3	Supplemental lists are developed that indicate the location of the closest public, private, and military hospitals, and other emergency medical facilities within the state or contiguous states considered capable of providing medical support for any contaminated, injured individual.

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

L.4	Each organization arranges for the transportation of contaminated, injured individuals and the means to control contamination while transporting victims of radiological incidents to medical support facilities and the decontamination of transport vehicle following use.

In addition to the information provided in element L.2, radiation monitoring is provided by Xcel Energy personnel whenever it becomes necessary to use an ambulance service for the transportation of contaminated persons. Injured

personnel are evaluated for radiological contamination using contamination control practices to transport to a medical facility per radiation protection procedures. Xcel Energy personnel will assist with decontamination of transport vehicles if necessary. Ambulance services are described in the site-specific annexes.

M. Recovery and Reentry Planning and Post-Accident Operations

General plans for recovery and reentry are developed.

Regulatory Reference: 10 CFR 50.47(b)(13); 44 CFR 350.5(a)(13)

M.1	General recovery, reentry, and return plans for radiological incidents are developed, as appropriate. These plans address re-occupancy, as appropriate. The plans should include:
M.1.a	Provisions for allowing reentry into areas controlled by the licensee. Reentry planning includes evaluation of the controls necessary for reentry under post-incident conditions.

Site reentry criteria and actions are established by recovery procedures.

M.1.b	Provisions for reentry into restricted areas, including exposure and contamination control, as appropriate. A method for coordinating and implementing decisions regarding temporary reentry into restricted areas is addressed.

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

M.2	Individuals who will comprise the licensee's recovery organization are identified by title/ position. The recovery organization includes technical personnel with responsibilities to develop, evaluate, and direct recovery and reentry operations.

Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization. The primary positions in the Recovery Organization are described as follows:

Recovery Manager

- Overall management of recovery activities.
- Interface with federal, state and county agencies during the recovery process

Operations Manager

- Direct interface with outage organization
- Provides oversight of work orders/priorities for repairs

RP Manager

- Coordinates radiological and environmental assessment with federal and state agencies.
- Coordinates offsite radwaste management and decontamination activities with OROs as needed.

Engineering Manager

- Provides oversight for repairs and modifications required as part of recovery efforts

Maintenance Manager

- Provides oversight for equipment repair and replacement work

Communications/Public Affairs

- Directs the Public Information Program during the recovery process.
- Supports communications with federal, state and local OROs

M.3	The process for initiating recovery actions is described and includes the criteria for terminating the emergency.

Implementing procedures provide guidance to directly terminate from an Unusual Event, Alert or Site Area Emergency with no long-term plant damage classifications when a normal outage organization is able to address any plant issues, or to transition to a recovery organization.

The Emergency Director in consultation with the Emergency Manager, determines when conditions warranting an emergency declaration have passed and steps will be taken to terminate directly from the event or transition to a recovery organization.

Recovery from an emergency situation is guided by the following principles:

- The protection of the public health and safety is the foremost consideration in formulating recovery plans.
- Public officials would be kept informed of recovery plans so that they can properly carry out their responsibilities to the public,

- Periodic information would be provided to the news media so that they can provide information to the public regarding recovery plans and progress made.
- Periodic status reports would be given to company employees at other locations and to government and industry representatives.

The Emergency Manager will take the following steps to inform members of the EOF, site organization, and off-site agencies that recovery operations are being initiated and that activities associated with bringing the plant to a safe shutdown condition are completed:

- Develop a brief message as to the time and date of recovery operations initiation as well as any necessary organizational realignments.

M.4	The process for initiating recovery actions is described and includes provisions to ensure continuity during transfer of responsibility between phases. The chain of command is established.

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

M.5	The framework for relaxing protective actions and allowing for return are described. Prioritization is given to restoring access to vital services and facilities.

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

M.6	The organization(s) responsible for developing and implementing cleanup operations offsite is identified.

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

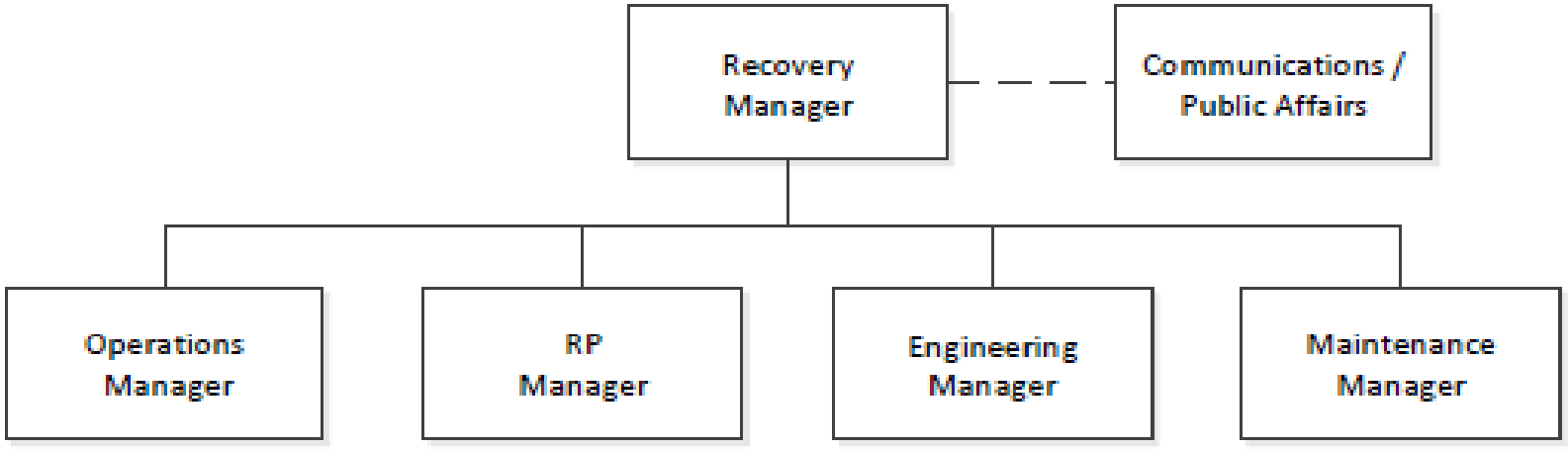
M.7	Provisions for developing and modifying sampling plans are established. Provisions for laboratory analysis of samples are included in the plan.

The recovery organization will coordinate Xcel Energy environmental sampling activities with the state agencies. Refer to elements C.4 and H.8 for a description of laboratory capabilities.

M.8	A method for periodically conducting radiological assessments of public exposure is established

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element

Figure M.2-1 Typical Long Term Recovery Organization



N. Exercises and Drills

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

Regulatory References: 10 CFR 50.47(b)(14); 44 CFR 350.5(a)(14).

N.1	Exercises and drills are conducted, observed, and critiqued/evaluated as set forth in NRC and FEMA regulations and guidance.

An exercise tests the integrated capability and a major portion of the elements of the emergency plan and organizations. Over the period of the exercise cycle, exercises will 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.

Drills are supervised instructional periods aimed at testing, developing and maintaining skills in a particular operation and are a part of the continuous training program and is often a component of an exercise.

Drills and Exercises may be comprised of combinations of the criteria described below.

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

Following exercises and drills, a critique is conducted by qualified Xcel Energy individuals to evaluate areas and identify issues with ERO performance, response procedures, facility and equipment adequacy. The critique is performed as soon as possible following the conclusion of a drill or exercise using preselected drill and exercise performance objectives that are evaluated against measurable demonstration criteria. Provisions are made for federal, state, and county representatives to observe and participate in drill and exercise critiques.

A critique report is prepared by the EP group following a drill or exercise documenting objective demonstration. Failed or degraded performance objectives are entered into the corrective action program (CAP).

N.1.b	The process used to track findings and associated corrective actions identified by drill and exercise critiques/evaluations, including their assignment and completion, is described.

The Xcel Energy CAP process provides for tracking and trending of issues in accordance with 10 CFR 50 Appendix B, Criterion XVI.

N.1.c	A drill or exercise starts between 6:00 p.m. and 4:00 a.m. at least once every eight-year exercise cycle.

Each Xcel Energy nuclear site will conduct at least one drill or exercise between 6:00 pm and 4:00 am within an eight-year exercise cycle.

This requirement may be satisfied by an actual event provided it meets the above criteria and the objectives are evaluated and documented in a critique report for the augmentation of the ERO.

N.1.d	A drill or exercise is unannounced at least once every eight-year exercise cycle.

Each Xcel Energy nuclear site will conduct at least one unannounced drill or exercise within an eight-year cycle.

This requirement may be satisfied by an actual event provided objectives are evaluated and documented in a critique report for the augmentation of the ERO.

N.2	Exercises are designed to enable the response organizations' demonstration of the key skills and capabilities necessary to implement the emergency plan. The following two types of exercises are conducted at the frequency noted:
N.2.a	Plume Exposure Pathway Exercises. Plume exposure pathway exercises are conducted biennially. These exercises include mobilization of licensee and state, local, and tribal government personnel and resources and implementation of emergency plans to demonstrate response capabilities within the plume exposure pathway EPZ.

Each Xcel Energy nuclear site will conduct a Plume Exposure Pathway (PEP) Exercise biennially. This exercise includes mobilization of licensee state, local,

and tribal government personnel, as applicable, and resources and implementation of emergency plans to demonstrate response capabilities.

State, county and tribal authorities are invited to participate in PEP exercises. If a state, county or tribal organization chooses not to participate it will be documented that they were given the opportunity to participate.

Exercise scenarios are submitted in accordance with 10 CFR50, Appendix E, IV.F(2)b.

N.2.b	Ingestion Exposure Pathway Exercises. Ingestion exposure pathway exercises are conducted at least once every eight years. These exercises include mobilization of state, local, and tribal government personnel and resources and implementation of emergency plans to demonstrate response capabilities to a release of radioactive materials requiring post-plume phase protective actions within the ingestion exposure pathway EPZ.

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

N.3	Exercise Scenario Elements. During each eight-year exercise cycle, biennial, evaluated exercise scenario content is varied to provide the opportunity to demonstrate the key skills and capabilities necessary to respond to the following scenario elements:
N.3.a	Hostile Action-Based (HAB). Hostile action directed at the NPP site. This scenario element may be combined with either a radiological release scenario or a no/minimal radiological release scenario, but a no/minimal radiological release scenario should not be included in consecutive HAB exercises at an NPP site.

During each eight-year exercise cycle, scenario content will address the following elements;

Each Xcel Energy nuclear site will conduct at least one HAB scenario in a drill or exercise within an eight-year cycle. The HAB scenario will include either a radiological release scenario or no/minimal radiological release scenario. HAB scenarios combined with a no/minimal radiological release scenario will not be used consecutively in exercises.

N.3.b	Rapid Escalation. An initial classification of, or rapid escalation to, an SAE or GE.

Each Xcel Energy nuclear site will conduct at least one rapid escalation scenario in a drill or exercise within an eight-year cycle. The rapid escalation scenario will begin with an initial classification of or rapidly escalate to the Site Area Emergency or General Emergency level.

N.3.c	No/Minimal Release of Radioactive Materials. No release or an unplanned minimal release of radioactive material which does not require public protective actions. This scenario element is used only once during each eight-year exercise cycle.

Each Xcel Energy nuclear site will conduct at least one No/Minimal radiological release scenario that escalates to a Site Area Emergency but does not require escalation to the General Emergency classification level with PARs in a drill or exercise within an eight-year cycle.

N.3.c.1	The licensee is required to demonstrate the ability to respond to a no/minimal radiological release scenario. State, local, and tribal government response organizations have the option, and are encouraged, to participate jointly in this demonstration. If the offsite organizations elect not to participate in the licensee's required minimal or no release exercise, the OROs will still be obligated to meet the exercise requirements as specified in 44 CFR 350.9.

State and county agencies located within the plume exposure pathway EPZ are invited to participate in No/Minimal radiological release scenarios.

N.3.c.2	When planning for a joint no/minimal radiological release exercise, affected state, local, and tribal government jurisdictions, the licensee, and FEMA will identify offsite capabilities that may still need to be evaluated and agree upon appropriate alternative evaluation methods to satisfy FEMA's biennial criteria requirements. Alternative evaluation methods that could be considered during the extent of play negotiations include expansion of the exercise scenario, out of sequence activities, plan reviews, staff assistance visits, or other means as described in FEMA guidance.

When planning for a joint no/minimal radiological release exercise, affected parties will identify offsite capabilities that may still need to be evaluated.

N.3.d	Resource Integration. Integration of offsite resources with onsite response.

Each Xcel Energy nuclear site will conduct at least one scenario that integrates offsite resources with onsite response in an exercise within an eight-year cycle.

Demonstration of resource integration includes briefings, offsite response to the site and coordination of worker protection, as appropriate to the scenario.

N.3.e	10 CFR 50.155(b)(2) Mitigation of Beyond-Design-Basis Events. Demonstration of the use of equipment, procedures, and strategies developed in compliance with 10 CFR 50.155(b)(2).

Each Xcel Energy nuclear site will conduct at least one scenario in a drill or exercise within an eight-year cycle to demonstrate strategies and guidelines to maintain or restore core cooling, containment, or spent fuel pool cooling capabilities under the circumstances associated with the loss of large area due to explosions or fire. Strategies to be demonstrated may include one or more of the following:

- Fire fighting
- Operations to mitigate fuel damage
- Actions to minimize radiological release

N.4	Drills are designed to enable an organization's demonstration and maintenance of key skills and capabilities necessary to fulfill functional roles. Drills include, but are not limited to, the following at their noted frequencies:
N.4.a	Emergency Medical Drills. Emergency medical drills are conducted annually. These drills involve a simulated, contaminated individual and contain provisions for participation by support services agencies (i.e., ambulance and offsite medical treatment facility).

Each Xcel Energy nuclear site will conduct an emergency medical drill once per calendar year.

The scope of the emergency medical drill will include a simulated contaminated individual and invitation for participation by support services agencies.

N.4.b	Medical Services Drills. Medical services drills are conducted annually at each medical facility designated in the emergency plan. These drills involve a simulated, contaminated emergency worker and/or member of the general public and contain provisions for participation by support services agencies (i.e., ambulance and offsite medical treatment facility).

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

N.4.c	Laboratory Drills. Laboratory drills are conducted biennially at each laboratory designated in the emergency plan. These drills involve demonstration of handling, documenting, provisions for record keeping, and analyzing air, soil, and food samples, as well as quality control and quality assurance processes. These drills also involve an assessment of the laboratory's capacity to handle daily and weekly samples and the volume of samples that can be processed daily or weekly

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

N.4.d	Environmental Monitoring Drills. Environmental monitoring drills are conducted annually. These drills include direct radiation measurements in the environment, collection and analysis of all sample media (e.g., water, vegetation, soil, and air), and provisions for record keeping.

Each Xcel Energy nuclear site will conduct an environmental monitoring drill once per calendar year. The scope of the environmental monitoring drill will include performance objectives for direct radiation measurements in the environment, collection and analysis of sample media including water, vegetation, soil, and air, provisions for communications and record keeping.

N.4.e	Ingestion Pathway and Post-Plume Phase Drills. Ingestion pathway and post-plume phase drills are conducted biennially. These drills involve sample plan development, analysis of lab results from samples, assessment of the impact on food and agricultural products, protective decisions for relocation, and food/crop embargos

This element is not applicable to the licensee. See state and county radiological emergency plans for specific information related to this element.

N.4.f	Communications Drills. Communications amongst and between emergency response organizations, including those at the state, local, and Federal level, the FMTs, and nuclear facility within both the plume and ingestion exposure pathway EPZs, are tested at the frequencies determined in evaluation criterion F.3. Communications drills include the aspect of understanding the content of messages and can be done in conjunction with the testing described in evaluation criterion F.3.

Communications Drills are accomplished during testing described in element F.3.

N.4.g	Post-Accident Sampling Drills. Post-accident sampling drills are conducted annually. These drills address capabilities including analysis of liquid and containment atmosphere samples with simulated elevated radiation levels. This criterion is not applicable if the NPP unit(s) does (do) not have licensing basis requirements for post-accident sampling.

Testing of Post-accident sampling systems are completed as a function of site technical specifications.

N.4.h	Off-Hours Report-In Drills. Off-hours report-in drills are conducted biennially and are unannounced.

Each Xcel Energy nuclear site will conduct an off-hours unannounced ERO report-in augmentation drill biennially. The EOF will participate concurrent with either of the Xcel Energy nuclear sites.

N.4.i	Off-Hours Call-In Drills. Off-hours call-in drills are conducted quarterly, such that each ERO member's normally expected response time is assessed at least biennially based on call-in drill responses or an alternate means for determining response time. Some drills are unannounced.

Each Xcel Energy nuclear site and the EOF will conduct an off-hours call-in drill quarterly. Some call-in drills will be unannounced.

The scope of the off-hours call-in drill will require ERO member's response regarding ability to respond to their applicable facility within the required augmentation time. Each Table B-1 ERO member's ability to respond within the required augmentation time will be assessed at least biennially.

N.4.j	Onsite Personnel Protective Action Drills. Onsite personnel protective action drills are conducted during every eight-year exercise cycle. These drills demonstrate the NPP site's ability to implement and coordinate protective actions for onsite personnel during hostile action.

Each Xcel Energy nuclear site will conduct a protective action drill within an eight-year cycle.

The scope of the protective actions drill will demonstrate the ability to implement and coordinate protective actions for onsite personnel during a hostile action.

N.4.k	Aircraft Threat/Attack Response Drills. Aircraft threat/attack response drills are conducted during every eight-year exercise cycle. These drills demonstrate the use of procedures and protective measures developed for responding to hostile action involving an aircraft threat or attack.

Each Xcel Energy nuclear site will conduct an aircraft threat/attack response drill within an eight-year cycle.

O. Radiological Emergency Response Training

Radiological emergency response training is provided to those who may be called on to assist in an emergency.

Regulatory References: 10 CFR 50.47(b)(15); 44 CFR 350.5(a)(15)

O.1	Each organization ensures the training of emergency responders and other appropriate individuals with an operational role described in the emergency plan. Initial training and at least annual retraining are provided.

Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency.

Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.

O.1.a	Site-specific emergency response training is developed and conducted for those offsite organizations that may be called upon to provide onsite assistance in the event of an emergency.

Xcel Energy offers emergency response training annually for those offsite organizations that may be called upon to provide onsite assistance in the event of an emergency. They are invited to attend training applicable to the Xcel Energy nuclear site or sites where they could provide assistance.

Training of state and county offsite response organizations is described in their respective radiological emergency plans, with support provided by Xcel Energy, if requested.

O.2	The ERO training program consists of learning objectives that are used to develop and maintain key skills. This includes a systematic analysis of jobs and tasks to be performed from which learning objectives are derived.

The EP Training Program Description identifies the training requirements for initial qualification, continuing training, and requalification of the ERO.

Training will be evaluated in accordance with the principles of the Systematic Approach to Training (SAT) practices to ensure effectiveness and in order to identify areas that need improvement or correction.

O.2.a	The ERO training program is reviewed at least annually and revised as necessary.

Revisions to the training program are identified with feedback from trainees in training and critique items during drills. EP training is also reviewed during EP assessments at the Xcel Energy nuclear sites. During assessments, ERO and EP staff performance is reviewed and appropriate revisions to the training program are made.

O.2.b	Training sessions that provide performance opportunities to develop, maintain, or demonstrate key skills are evaluated in order to identify weak or deficient areas that need correction.

Training sessions providing performance enhancing opportunities for key positions are evaluated in order to identify weak or deficient areas that need correction for the key skills demonstrated.

P. Responsibility for the Planning Effort: Development, Periodic Review, and Distribution of Emergency Plans

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

Regulatory References: 10 CFR 50.47(b)(16); 44 CFR 350.5(a)(16)

P.1	The training program, including initial training and periodic retraining, of individuals responsible for the planning effort is described.

EP staff responsible for the planning effort complete initial and continuing training on regulatory requirements, applicable guidance documents and industry operating experience.

P.2	The individual with the overall authority and responsibility for radiological emergency planning is identified by title/position

The Xcel Energy Chief Nuclear Officer has the overall authority and responsibility for Xcel Energy Emergency Plan.

P.3	The individual(s) with the responsibility for the development, maintenance, review, updating, and distribution of emergency plans, as well as the coordination of these plans with other response organizations, is identified by title/position.

The Xcel Energy EP Staff is responsible for the development, maintenance, review, and updating of the emergency plan and site-specific annexes, as well as the coordination of the plan with other response organizations as shown in Figure P.1.

P.4	The process for reviewing annually, and updating as necessary, the emergency plan, implementing procedures, maps, charts, and agreements is described. The process includes a method for recording changes made to the documents and, when appropriate, how those changes are retained.

The SEP and associated documents as identified herein, are reviewed on an annual basis and updated if necessary. Changes due to regulatory revisions, issues identified by drills and exercises, or other updates will be incorporated.

Agreements with supporting organizations will be reviewed and certified to be current on an annual basis and updated, if necessary. Changes to agreements may be coordinated with the annual review of the SEP.

Emergency Plan changes will be processed in accordance with 10 CFR 50.54(q) requirements and fleet document control/records management procedures. ETE updates are completed in accordance with 10 CFR 50, Appendix E, IV.4, 5 & 6.

P.5	Provisions for distributing the emergency plan and implementing procedures to all organizations and appropriate individuals with responsibility for implementation of the plan/procedures are described.

Approved changes to the SEP, associated documents and implementing procedures will be transmitted in accordance with the distribution list maintained in the Electronic Document Management System (EDMS).

P.6	A listing of annexes, appendices, and supporting plans and their originating agency is included in the emergency plan.

A listing of emergency plan extension documents is included in the Introduction of this SEP.

External emergency plans specific that support the SEP are listed in Section A.1.a. Supporting plans for organizations that support individual sites are listed in the site-specific annexes.

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.

Appendix C of the SEP provides a listing by title of the procedures required to maintain and implement the emergency plan and the section(s) of the emergency plan to be implemented by each procedure.

P.8	A table of contents and a cross-reference index to each of the NUREG-0654/FEMA-REP-1, Rev. 2 evaluation criteria are included. The evaluation criteria that do not apply are identified.

SEP contains a specific table of contents. The SEP and Annexes are numbered corresponding to the NUREG-0654/FEMA-REP-1, Rev.2 evaluation criteria. Evaluation criteria which do not apply to utilities are listed and identified.

P.9	Provisions for addressing the requirements of 10 CFR 50.54(t) are described.

An independent review will be conducted in accordance with the requirements of 10CFR50.54(t)(2). The review findings will be submitted to the appropriate corporate and site management. The part of the review involving the evaluation of the adequacy of interface with state and county governments will be reported to the appropriate state and county governments. Corporate or site management, as appropriate, will evaluate the findings affecting their area of responsibility and ensure effective corrective actions are taken. The results of the review, along with recommendations for improvements, will be documented, and retained.

P.10	The administrative process for the periodic review and updating of contact information identified in the emergency plan and implementing procedures is described.

The Emergency Preparedness Emergency Telephone Directory contains contact numbers for ORO, ERF, and support organizations identified in the emergency plan and implementing procedures.

The directory is reviewed quarterly and updated as needed. EP staff update call out information in the ERO Notification System quarterly.

P.11	The process for entering EP program-related issues that could reduce the effectiveness of the emergency plan into the site-wide corrective action program is described.

Xcel Energy CAP is used to capture conditions that do not meet program regulations, requirements, or expectations, or are otherwise adverse to quality.

P.12	The process to evaluate changes in plant configuration for their impact on the effectiveness of the emergency plan is described.

Changes in plant configuration are evaluated for their impact on the effectiveness of the emergency plan through the Applicability Determination process specified in Regulatory Affairs procedures and, if required, the 10 CFR 50.54(q) process specified in EP procedures.

SECTION III: APPENDICES

APPENDIX A – DEFINITIONS

The following are definitions of terms commonly used in this Emergency Plan and each site-specific annex:

Accountability
Accountability is the list of individuals missing within the protected area after a site assembly has been called.

Assembly
The process of relocating personnel onsite to pre-designated locations as a personnel protective measure during an event.

Committed Dose Equivalent (CDE)
CDE is the dose equivalent to organs or tissues of reference that will be received from an intake of radioactive material by an individual during the 50-year period following the intake.

Committed Effective Dose Equivalent (CEDE)
CEDE is the sum of the products of the weighting factors applicable to each of the body organs or tissues that are irradiated and the CDE to these organs or tissues.

Dose Equivalent (DE)
DE is the product of the absorbed dose in tissue, quality factor and all other necessary modifying factors at the location of interest. The units of dose equivalent are the rem and sievert (Sv).

Effective Dose Equivalent (EDE)
EDE is the sum of the products of the dose equivalent to each organ or tissue and a weighting factor applicable to each of the body organs or tissues that are irradiated.

Emergency Action Levels (EALs)
A pre-determined, site-specific, observable threshold for a plant Initiating Condition that, when met or exceeded, places the plant in a given emergency classification level.

Emergency Planning Zones (EPZ)

A defined area around the plant to facilitate emergency planning by state and local authorities, to assure that prompt and effective actions are taken to protect the public in the event of a release of radioactive material. It is defined for:

- Plume Exposure Pathway – A 10-mile radius around the plant where the principal exposure source is: (1) whole body exposure to gamma radiation from the plume and from deposited material; and (2) inhalation exposure from the passing radioactive plume (Short Term Exposure).

- Ingestion Exposure Pathway – A 50-mile radius around the plant where the principal exposure would be from the ingestion of contaminated water or foods such as milk or fresh vegetables (Long Term Exposure).

Emergency Worker

Any individual involved in mitigating the consequences of an emergency situation and/or minimizing or preventing exposure to the offsite population.

Facility Activation

An Emergency Response Facility is activated when the minimum staff per Figures B-1, B-2 and B-3 are available and the facility is ready to assume its assigned Emergency Plan functions and relieve the on-shift staff of those functions. Although the facility may be ready, the on-shift staff relief may be postponed in the interests of completing critical tasks prior to turnover.

Hostile Action

An act towards a nuclear power plant or its personnel that includes the use of violent force to destroy equipment, take hostages, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, projectiles, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. Hostile action should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the nuclear power plant. Non-terrorist based EALs should be used to address such activities, (e.g., violent acts between individuals in the owner-controlled area).

Offsite Survey

The area located beyond the confines of the Protected Area.

Onsite Survey

The area located within the confines of the Protected Area.

Owner Controlled Area

The area owned by the licensee and located within the confines of the Site Boundary.

Protective Actions

Emergency measures taken to avoid or reduce radiation dose. These commonly include sheltering, evacuation, and prophylaxis.

Protective Action Decision (PADs)

Protective actions determined and implemented by offsite agencies for protection of the health and safety of the general public.

Protective Action Recommendations (PARs)

Protective actions recommended by a plant to offsite agencies to protect the health and safety of the public within the plume exposure pathway.

Protective Action Guides (PAGs)

Projected dose to individuals, that warrants protective action prior to and/or following a radioactive release.

Site Boundary

The boundary of a reactor site beyond which the land or property is not owned, leased, or otherwise controlled by the licensee.

Total Effective Dose Equivalent (TEDE)

TEDE is the sum of the Deep-Dose Equivalent (for external exposures) and the CEDE (for internal exposures).

Vital Areas

Areas within the protected area that contain equipment vital to the operations of the plant.

APPENDIX B – CROSS REFERENCE TO 10 CFR 50 APPENDIX E.IV – CONTENT OF EMERGENCY PLANS

Regulatory Criteria	E-Plan Reference
1. The applicant's emergency plans shall contain, but not necessarily be limited to, information needed to demonstrate compliance with the elements set forth below, i.e., organization for coping with radiological emergencies, assessment actions, activation of emergency organization, notification procedures, emergency facilities and equipment, training, maintaining emergency preparedness, recovery, and onsite protective actions during hostile action.	N/A
2. This nuclear power reactor license applicant shall also provide an analysis of the time required to evacuate various sectors and distances within the plume exposure pathway EPZ for transient and permanent populations, using the most recent U.S. Census Bureau data as of the date the applicant submits its application to the NRC.	Annex J.8.a
3. Nuclear power reactor licensees shall use NRC approved evacuation time estimates (ETEs) and updates to the ETEs in the formulation of protective action recommendations and shall provide the ETEs and ETE updates to state and local governmental authorities for use in developing offsite protective action strategies.	Annex J.8.a J.7
4. Within 365 days of the later of the date of the availability of the most recent decennial census data from the U.S. Census Bureau or December 23, 2011, nuclear power reactor licensees shall develop an ETE analysis using this decennial data and submit it under § 50.4 to the NRC. These licensees shall submit this ETE analysis to the NRC at least 180 days before using it to form protective action recommendations and providing it to state and local governmental authorities for use in developing offsite protective action strategies.	SEP Section P.4
5. During the years between decennial censuses, nuclear power reactor licensees shall estimate EPZ permanent resident population changes once a year, but no later than 365 days from the date of the previous estimate, using the most recent U.S. Census Bureau annual resident population estimate and state/local government population data, if available. These licensees shall maintain these estimates so that they are available for NRC inspection during the period between decennial censuses and shall submit these estimates to the NRC with any updated ETE analysis.	Annex J.8.a SEP Section P.4

6. If at any time during the decennial period, the EPZ permanent resident population increases such that it causes the longest ETE value for the 2-mile zone or 5-mile zone, including all affected Emergency Response Planning Areas, or for the entire 10-mile EPZ to increase by 25 percent or 30 minutes, whichever is less, from the nuclear power reactor licensee's currently NRC approved or updated ETE, the licensee shall update the ETE analysis to reflect the impact of that population increase.	Annex J.8.a SEP Section P.4
The licensee shall submit the updated ETE analysis to the NRC under § 50.4 no later than 365 days after the licensee's determination that the criteria for updating the ETE have been met and at least 180 days before using it to form protective action recommendations and providing it to state and local governmental authorities for use in developing offsite protective action strategies.	Annex J.8.a SEP Section P.4
7. After an applicant for a combined license under part 52 of this chapter receives its license, the licensee shall conduct at least one review of any changes in the population of its EPZ at least 365 days prior to its scheduled fuel load. The licensee shall estimate EPZ permanent resident population changes using the most recent U.S. Census Bureau annual resident population estimate and state/local government population data, if available. If the EPZ permanent resident population increases such that it causes the longest ETE value for the 2-mile zone or 5-mile zone, including all affected Emergency Response Planning Areas, or for the entire 10-mile EPZ, to increase by 25 percent or 30 minutes, whichever is less, from the licensee's currently approved ETE, the licensee shall update the ETE analysis to reflect the impact of that population increase. The licensee shall submit the updated ETE analysis to the NRC for review under § 50.4 of this chapter no later than 365 days before the licensee's scheduled fuel load.	N/A

10 CFR 50 Appendix E.IV.A – Organization

The organization for coping with radiological emergencies shall be described, including definition of authorities, responsibilities, and duties of individuals assigned to the licensee's emergency organization and the means for notification of such individuals in the event of an emergency. Specifically, the following shall be included:

Criteria	E-Plan	Criteria	E-Plan	Criteria	E-Plan
1.	B.1.a	3.	B.1.a	7.	Annex A.4
2.a	B.1.a, B.2, B.2.a	4.	B.1.a, I.6, E.3	8.	A.1.a
2.b	B.1.a	5.	B.1.a, B.5	9.	B.1.a, Annex B.1.a
2.c	B.1.a, B.2, B.2.a	6.	A.1.a, C.2, C.2.d		

10 CFR 50 Appendix E.IV.B – Assessment Actions

Criteria	E-Plan	Criteria	E-Plan	Criteria	E-Plan
1.	I.6, D.1.a, D.1.b	2.	D.1.a		

10 CFR 50, Appendix E.IV.C – Activation of Emergency Organization

Criteria	E-Plan	Criteria	E-Plan	Criteria	E-Plan
1.	F.1.c, E.1.a D.1, D.1.b	2.	D.2		

10 CFR 50, Appendix E.IV.D – Notification Procedures

Criteria	E-Plan	Criteria	E-Plan	Criteria	E-Plan
1.	Annex E.2, E.3	3.	E.1, Annex E.2		
2.	G.1	4.	NA		

10 CFR 50, Appendix E.IV.E – Emergency Facilities and Equipment

Adequate provisions shall be made and described for emergency facilities and equipment, including:

Criteria	E-Plan	Criteria	E-Plan	Criteria	E-Plan
1.	K.1.c	8.b	H.3, Annex H.3.a	8.d	Annex H.4
2.	I.8, I.9	8.b (1)	Annex H.3.a	8.e	NA
3.	K.1.e	8.b (2)	Annex H.3.a	9.	F.1, Annex F.1.a, E.1
4.	L.2.e	8.b (3)	Annex H.3.a	9.a	E.1, Annex F.1.b, F.3
5.	L.2.b	8.b (4)	Annex H.3.a	9.b	E.1, Annex F.1.b, F.3
6.	L.4	8.b (5)	Annex H.3.a	9.c	Annex F.1.a, Annex F.1.b
7.	L.2.b	8.c (1)	H.3	9.d	E.1, Annex F.1.b, F.3
8.a (i)	H.1, H.3	8.c (2)	H.3		
8.a.(ii)	H.2	8.c (3)	H.3		

10 CFR 50, Appendix E.IV.F – Training

Criteria	E-Plan	Criteria	E-Plan	Criteria	E-Plan
1.(a)	N.1	1.(b).ix	O.1, O.1.a	2.c (3)	NA
1.(b)	N.4, N.4.a, N.4.d, F.3, N.4.h – k, O.1	2.	N.1	2.c (4)	NA
1.(b).i	O.1	2.a	N.2.a	2.c (5)	NA
1.(b).ii	O.1	2.a (i)	NA	2.d	NA
1.(b).iii	O.1	2.a (ii)	NA	2.e	N.4
1.(b).iv	O.1	2.a (iii)	NA	2.f	N.1.a
1.(b).v	O.1	2.b	N.2.a, N.4	2.g	N.1.a, N.1.b
1.(b).vi	O.1	2.c	NA	2.h	N.2.a
1.(b).vii	O.1	2.c (1)	NA	2.i	N.1, N.3, N.3.a-e, N.4
1.(b).viii	O.1	2.c (2)	NA		

10 CFR 50, Appendix E.IV.G – Maintaining Emergency Preparedness

Criteria	E-Plan	Criteria	E-Plan	Criteria	E-Plan
IV.G	P.2, P.3, P.4				

10 CFR 50, Appendix E Section IV.H – Recovery

Criteria	E-Plan	Criteria	E-Plan	Criteria	E-Plan
IV.H	M.1.a				

10 CFR 50, Appendix E.IV.I – Onsite Protective Actions During Hostile Action

Criteria	E-Plan	Criteria	E-Plan	Criteria	E-Plan
IV.I	J.5				

Appendix C – NUREG 0654, Rev 2 and EPIP Cross walk

NUREG-0654 Rev 2 Section	Applicable EPIP

EPIPS Currently Under Development

Appendix D – Changes from Previous Revision

Revision #	Description	Date

ENCLOSURE 2

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

LICENSE AMENDMENT REQUEST
XCEL ENERGY STANDARD EMERGENCY PLAN
MONTICELLO ANNEX – TECHNICAL ANALYSIS

(17 Pages Follow)

ENCLOSURE 2

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1

LICENSE AMENDMENT REQUEST
XCEL ENERGY STANDARD EMERGENCY PLAN
MONTICELLO ANNEX – TECHNICAL ANALYSIS

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Attachments

1. Monticello Plan Annex
2. Xcel Energy Corporate Emergency Plan Justification Matrix
3. Monticello Nuclear Generating Plant Change Justification Matrix
4. Monticello Nuclear Generating Plant ERO Change Summary
5. Monticello Communications Methods and Interfaces Comparative Table

MONTICELLO ANNEX – TECHNICAL ANALYSIS

1.0 SUMMARY

This License Amendment Request (LAR) revises the Monticello Nuclear Generating Plant (MNGP) Emergency Plan which includes the Corporate Offsite Emergency Plan. The proposed revisions include:

- Adoption of a fleet Xcel Energy Standard Emergency Plan (SEP) that includes site-specific Annexes. The SEP establishes an updated licensing basis for the Xcel Energy operating plants that complies with current NRC regulations in 10 CFR 50.47, 10 CFR 50 Appendix E, and NRC-generated guidance in NUREG-0654/FEMA-REP-1, *Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness*, Revision 2.
- Replacing the existing MNGP and the Prairie Island Nuclear Generating Plant (PINGP) near-site Emergency Offsite Facilities (EOFs), and their common backup EOF (BUEOF) with a consolidated EOF centrally located in the Xcel Energy headquarters – the detailed description and analysis for this change is contained in Enclosure 4 of this submittal.
- Maintaining the Emergency Notification System (ENS) function in the site Technical Support Centers (TSC) rather than transferring the function to the Emergency Operations Facility (EOF).
- Updates in staffing numbers and duties to conform with NUREG-0654/FEMA-REP-1, Revision 2.
- Re-assignment of on-shift dose assessment from the Chemistry Technician to an RP Technician.

Changes that are common to the MNGP, PINGP, and the Corporate Offsite Emergency Plans are evaluated in Enclosure 1. Changes that are specific to the MNGP Emergency Plan are evaluated below.

The proposed SEP is based on regulatory guidance contained in NUREG-0654 FEMA/REP 1, Revision 2. The format of the proposed SEP is designed to conform with the format outlined in NUREG-0654/FEMA-REP-1. Consequently, regulatory references, emergency planning functions, and functional elements are identified for each section of the proposed SEP. For those functional areas that are addressed in the Site-Specific Annexes, a similar format is used.

2.0 TECHNICAL ANALYSIS

This analysis evaluates the impact to the effectiveness of combining the MNGP Emergency Plan and the Corporate Offsite Emergency Plan into a combined Standard Emergency Plan with a site-specific Annex for MNGP. The evaluation compares the

existing emergency plan commitments[1] which are based on NUREG-0654/FEMA-REP-1, *Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants*, Revision 1, and subsequent amendments to the Emergency Plan licensing basis, with the commitments in the proposed emergency plan which are based on NUREG-0654/FEMA-REP-1, Revision 2. The evaluation is supported an attachment that contains a detailed justification matrix for changes to the MNGP and Corporate Offsite Emergency Plans.

A. Assignment of Responsibility

Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the EPZs [Emergency Planning Zones] have been assigned, the emergency responsibilities of the various supporting organization have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

Element Analysis:

A.1 The proposed MNGP Plan Annex states that the county and municipal governments with an operational role within the MNGP 10-mile EPZ as depicted in Figure 1 of the MNGP Plan Annex are:

- Wright County
- Sherburne County

The county governments having an operational role within the MNGP 50-mile Ingestion Pathway Zone (IPZ) as depicted in Figure 2 of the MNGP Plan Annex are:

Minnesota			
Anoka	Isanti	Morrison	Sibley
Benton	Kanabec	Pine	Stearns
Carver	Kandiyohi	Ramsey	Washington
Chisago	McLeod	Renville	Wright
Dakota	Meeker	Scott	
Hennepin	Mille Lacs	Sherburne	

Commitments in the proposed SEP MNGP Plan Annex related to the identification of Federal, state, local and tribal governments, licensee, and other private sector organization that comprise the overall

1. The term 'commitment' used throughout this document is not to be construed as a formal NRC commitment as described in NEI 99-04, *Guidelines for Managing NRC Commitment Changes*. Rather, "commitment" is used consistent with the NRCs usage of the term in Regulatory Guidance (RG) 1.219, Revision 1, *Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors.*

response for the EPZs do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

A.4 The proposed MNGP Plan Annex states that site specific Letters of Agreement (LOAs) are maintained by Xcel Energy with the following organizations:

- GE Hitachi Nuclear Energy (GEH)
- CentraCare – Monticello (CC-M)
- CentraCare St. Cloud Hospital (SCH)
- Sherburne County Sheriff's Department and Emergency Services Division
- Wright County
- City of Monticello

Support for HAB events is included as appropriate.

Commitments in the proposed MNGP Plan Annex related to the referencing of written agreements with the support organizations having an emergency response role within the EPZs do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

B. Emergency Response Organization (ERO)

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

Functional Analysis:

B.1 The MNGP Plan Annex states that the MNGP on-shift staffing analysis has been developed in accordance with 10 CFR 50 Appendix E.IV.A.9 and NEI 10-05.

The MNGP On-Shift Staffing Analysis Report (EPLAN-08) is maintained in the Document Management System.

Commitments in the proposed MNGP Annex related to the specification of how the requirements of 10 CFR 50.47(b)(2) and the applicable sections of Appendix E to 10 CFR Part 50 are met do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

B.2 Note: In the proposed SEP on-shift and augmented staffing is common to MNGP and PINGP. However, because the current staffing is not common to MNGP and PINGP, the detailed description of staffing changes is addressed below and in Attachment 4 of the specific Enclosure for each site.

Plant Operations and Assessment of Operational Aspects

a. NUREG-0654/FEMA REP-01 Revision 1 guidance assumes the on-shift staff will provide the Plant Operations and Assessment of Operational Aspects functions throughout the emergency. The on-shift operations staffing as provided in the SER approved MNGP Emergency Plan, Revision 50 met the operations staffing requirements of 10 CFR 50.54(m)(2)(i) and the MNGP Technical Specifications. The current MNGP Emergency Plan maintains Revision 50 staffing for Operations.

b. NUREG-0654/FEMA REP-01, Revision 2, notes that Table B-1, Emergency Response Organization (ERO) Staffing and Augmentation Plan, lists the EP functions needed to implement the typical emergency plan. Plant Operations and Assessment of Operational Aspects is not considered an EP function inNUREG-0564, Revision 2. Accordingly, the plant Operations and Assessment of Operational Aspects function is not included in the proposed SEP, Table B-1, Minimum On-Shift and Augmented Staffing. MNGP continues to meet the operations staffing requirements of 10 CFR 50.54(m)(2)(i) and the MNGP Technical Specifications.

Emergency Direction and Control

a. In MNGP Emergency Plan, Revision 50[2], staffing, the Shift Manager was designated as the on-shift Emergency Director (ED) to fulfill the function of Emergency Direction and Control until augmented by the Technical Support Center (TSC) ED within 60 minutes of declaration of an Alert or higher emergency. An Emergency Operations Facility (EOF) Emergency Manager is augmented within 90 minutes of an Alert or higher declaration. The current MNGP Emergency Plan maintains these staffing requirements.

b. The proposed SEP retains the commitment for the Shift Manager to perform the ED function until augmented within 60 minutes by the TSC ED and the EOF Emergency Manager within 90 minutes of an Alert or higher declaration.

   The proposed change continues to meet the staffing guidance in accordance with NUREG-0654/FEMA REP-01, Revision 2.

Notification and Communication

a. In the SER approved MNGP Emergency Plan, Revision 50, staffing for the Notification and Communication functional area provided for one communicator on-shift augmented by two communicators at 60 minutes and two additional communicators at 90 minutes. The current MNGP Emergency Plan maintains this staffing for the Notifications function.

2. MNGP Emergency Plan, Revision 50, staffing was approved by the NRC in license Amendment Number 196, dated March 5, 2018 (ADAMS Accession Number ML17349A916).

b. The proposed SEP provides for the addition of a second communicator position on-shift, while maintaining augmented response of two communicators at 60 minutes. The proposed change reduces the number of 90-minute responders for this function from two to one. This reduction in augmented staffing is a result of the reconfiguration of command-and-control assignments in the TSC and EOF. The proposed plan retains the Emergency Notification System (ENS) function in the TSC and does not transfer the function to the EOF. As a result, a second communicator in that facility is no longer required.

   The proposed change continues to meet the staffing guidance in accordance with NUREG-0654/FEMA REP-01, Revision 2.

Radiological Accident Assessment and Support of Operational Accident Assessment

The function of on-site radiological assessment is to: review radiological conditions on site using data from available instrumentation, assess the impact of changing radiological conditions on emergency classification, assist in accident assessment based upon those changing radiological conditions, and recommend appropriate on-site protective measures. In MNGP Emergency Plan, Revision 50, this functional area consists of five major tasks: Emergency Operations Facility (EOF) and Technical Support Center (TSC) Leads; Off-Site Dose Assessment; Off-Site Surveys; On-Site (out-of-plant)/in-plant Surveys; and Chemistry/Radio Chemistry.

Emergency Operations Facility and TSC Leads

a. In the MNGP Emergency Plan, Revision 50, staffing, classification was performed by the Shift Manager/ED using established implementing procedures. Off-site and onsite surveys provided additional information, such as direct radiation measurements, that can be directly applied to emergency classification. The classification function is transferred to the TSC ED. The EOF Emergency Manger position was augmented within 90 minutes. This organization is maintained in the current MNGP Emergency Plan.

b. The proposed SEP staffing continues to assign the classification task to the Shift Manager/ED and continues to be augmented by the TSC ED within 60 minutes. The EOF Emergency Manager continues to be augmented within 90 minutes.

   The proposed change continues to meet the staffing guidance in accordance with NUREG-0654/FEMA REP-01, Revision 2.

Off-Site Dose Assessment

a. In the MNGP Emergency Plan, Revision 50, staffing, offsite dose assessment was assigned to the shift chemistry technician. Offsite dose assessment was augmented by the Radiological Emergency Coordinator in the TSC within 60 minutes augmented at 90 minutes in the EOF by the Radiation Protection Supervisor (RPSS). The current

MNGP Emergency Plan maintains this organization for the performance of dose assessment on-shift.

b. The proposed SEP re-assigns the offsite dose assessment task from the on-shift Chemistry Technician to the Radiation Protection (RP) Technician as a collateral duty. The offsite dose assessment task continues to be augmented by a dose assessment specialist in the TSC at 60 minutes and further augmented in the EOF at 90 minutes.

   As stated in Northern States Power Company (NSPM) letter to NRC, "Monticello Nuclear generating Plant License Amendment Request: Revision to Emergency Plan Staff Augmentation Response Times," dated March 24, 2017, (ML17083a083), improvements in the dose assessment program related to implementation of URI and availability of data from the Plant Process Computer System (PPCS) results in minimal user interface for completion of this activity. The adequacy of the proposed change in on-shift staffing assignment has been verified through a 10 CFR 50, Appendix E, Section IV.A.9 analysis and demonstrated that the change does not result in conflicts in on-shift responsibilities.

   The proposed change continues to meet the staffing guidance in accordance with NUREG-0654/FEMA REP-01, Revision 2.

Off-Site Surveys

a. In the MNGP Emergency Plan, Revision 50, staffing, the off-site survey task was performed by an augmented two person radiological monitoring team within 60 minutes of event declaration. The task was further augmented within 90 minutes by a second two person radiological monitoring team. The current MNGP Emergency Plan maintains this on-shift and augmented response.

b. In the proposed SEP, the offsite survey task will be assigned to Field Monitoring Team (FMT) personnel. One FMT Monitor will be assigned to the TSC. In addition, one FMT Lead, and one FMT Member will continue to be augmented within 60 minutes and additional FMT Lead and an additional FMT member will be augmented within 90 minutes of event declaration.

   The above is consistent with NUREG-0654/FEMA REP-1, Revision 2, guidance.

On-Site Surveys (Out-of-Plant and In-Plant)

a. In the MNGP Emergency Plan, Revision 50, staffing, two on-shift radiation protection personnel were assigned to the on-site survey function and were augmented within 60 minutes for performance of in-plant and out-of-plant surveys with an additional radiation protection support person augmented at 90 minutes. The current MNGP Emergency Plan maintains the on-shift and augmented staffing for performance of on-site surveys.

b. In the proposed SEP the on-site survey task will continue to be performed by one on-shift Radiation Protection (RP) Technician and will be augmented by an RP Technician at 60 minutes and an additional RP Technician at 90 minutes. The second on-shift radiation protection specialist discussed above will be assigned to the protective action task as described below.

   The above is consistent with NUREG-0654/FEMA REP-1, Revision 2, guidance.

Chemistry/Radio Chemistry

a. In the MNGP Emergency Plan, Revision 50, staffing, the chemistry/radio chemistry task was assigned to one on-shift position. This position was augmented within 60 minutes. The on-shift Chemistry Technician also performed dose assessments as needed. The current MNGP Emergency Plan maintains the on-shift and augmented staffing for chemistry/radiochemistry.

b. In the proposed SEP, the on-shift Chemistry Technician position is removed, and the chemistry/radio chemistry task is eliminated. Chemistry functions are maintained in accordance with site technical specifications governed by licensing processes outside the emergency plan. The proposed change is also aligned with NUREG-0654/FEMA-REP-1, Revision 2. The dose assessment function is reassigned to an RP Technician on-shift as described above.

Plant System Engineering, Repair and Corrective Actions

This functional area includes two tasks: Technical Support, and Repair and Corrective Actions.

Technical Support

a. In the MNGP Emergency Plan, Revision 50, staffing, one of three on-shift SROs perform the STA function and were augmented by a Core Thermal Engineer within 60 minutes of declaration of an Alert or higher classification and by Mechanical and Electrical Engineers reporting to the TSC within 60 minutes of declaration of an Alert or higher classification. The current MNGP Emergency Plan maintains the on-shift and augmented staffing for performance of engineering and technical support activities.

b. The proposed SEP remains unchanged regarding the Technical Support task.

   The above is consistent with NUREG-0654/FEMA REP-1, Revision 2, guidance.

Repair and Corrective Actions

a. In the MNGP Emergency Plan, Revision 50, damage control and repair for electrical, mechanical, and instrument and control equipment was

performed by one mechanical maintenance technician and one electrical maintenance technician reporting to the Operational Support Center (OSC) within 60 minutes of declaration of an Alert or higher classification, and one I&C technician reporting to the OSC within 90 minutes of declaration of an Alert or higher classification. In addition, mechanical maintenance, electrical maintenance, and instrument and control coordinators report to the OSC within 60 minutes. The current MNGP Emergency Plan maintains this augmented staffing for response in the area of repair and corrective actions.

b. In the proposed SEP, damage control and repair activities for electrical, mechanical, and instrument and control equipment continue to be performed by mechanical and electrical maintenance technicians augmented at 60 minutes as an I&C maintenance technician at 90 minutes.

   The proposed SEP also maintains response by one mechanical maintenance coordinator, one electrical maintenance coordinator and one instrument and control coordinator augmented within 90 minutes. In addition, the OSC coordinator will continue to be augmented within 60 minutes and will provide oversight for RP and maintenance personnel between 60 and 90 minutes. Finally, the radiation protection coordinator will be extended from 60 to 90 minutes.

   The above is consistent with NUREG-0654/FEMA REP-1, Revision 2, guidance.

Protective Action (In-Plant)

This functional area includes four tasks: Access control; Health Physics (HP) Coverage for repair, corrective actions, search and rescue first aid, and firefighting; personnel monitoring; and dosimetry.

a. In the MNGP Emergency Plan, Revision 50, staffing, two radiation protection personnel were assigned to this functional area as an ancillary duty of the two radiation protection personnel on shift. The MNGP Emergency Plan provides for one additional radiation protection person to be augmented within 60 minutes and another augmented within 90 minutes. The current MNGP Emergency Plan maintains this on-shift and augmented staffing.

b. In the proposed SEP, tasks included in the protective action functional area have been relocated to the Radiological Accident Assessment functional area to be consistent with the guidance in NUREG-0654/FEMA REP-1, Revision 2. The proposed SEP identifies one radiation protection qualified individual to be assigned on shift. As stated previously, the RP Specialist assigned to performance of the protective action function will perform dose assessment activities as a collateral duty. Two additional radiation protection qualified individuals

will be augmented within 60 minutes and two additional radiation protection qualified individuals will be augmented within 90 minutes.

This is consistent with the guidance contained in NUREG-0654/FEMA REP-1, Revision 2.

Fire Fighting

a. In the MNGP Emergency Plan, Revision 50, staffing, the Fire Brigade is assigned in accordance with station administrative procedures. The current MNGP Emergency Plan maintains this reference.

b. In the proposed SEP, references to the Fire Brigade are removed as this function is governed under the site Fire Protection Program Plan. This change is consistent in the guidance contained in NUREG-0654/FEM/REP-1, Revision 2.

Rescue Operations and First Aid.

a. In the MNGP Emergency Plan, Revision 50, staffing, two on-shift individuals were assigned to the Rescue Operations and First Aid functional area, but the individuals could be assigned other responsibilities. The functional area was augmented by local support personnel. The current MNGP Emergency Plan maintains this staffing.

b. In the proposed SEP, assignment of the Rescue Operations and First Aid functional area is removed as these functions are governed under administrative procedures maintained outside the Emergency Plan. This change is consistent in the guidance contained in NUREG-0654/FEM/REP-1, Revision 2.

Site Access Control and Personnel Accountability

a. In the MNGP Emergency Plan, Revision 50, staffing for the Site Access Control and Accountability functional area was fulfilled by the security force in accordance with the security plan. The current MNGP Emergency Plan maintains this reference for site access control and accountability.

b. In the proposed SEP, Site Access Control and Personnel Accountability is removed from the emergency plan as these activities are governed under the Site Security Program. This change is consistent with NUREG 0654/FEMA REP-1, Revision 2.

Changes to the MNGP on-shift and augmented staffing tables continue to meet the intent of regulatory guidance as described in NUREG-0654/FEMA-REP-1, Table B-1, Revision 2. The on-shift staffing has been assessed in accordance with 10 CFR 50, Appendix E, Section IV.A.9 and determined that on-shift staff can support assigned EP functions as well as other assigned duties.

Changes to the augmented ERO staffing, including changes in titles, assigned to the TSC, OSC, EOF, and Joint Information Center (JIC) are addressed on Attachment 4 of this Enclosure.

B.3 The proposed SEP MNGP Plan Annex states that the following contractors may be requested to provide technical assistance.

- Arcadis: Arcadis will provide personnel and/or consulting services to MNGP as needed.
- GE Hitachi Nuclear Energy (GEH): GEH will provide assistance and services to MNGP through the BWR Nuclear Emergency Support Program as identified in Services Information Letter SIL No. 324.
- GEL Laboratories, LLC: GEL will provide personnel and laboratory support services to MNGP as needed.

Commitments in the proposed MNGP Plan Annex related to the specification of external organizations, including contractors, that may be requested to provide technical assistance to and augmentation of the ERO do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

D. Emergency Classification System

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Element Analysis:

D.1 The proposed SEP MNGP Plan Annex states that the MNGP EAL scheme is documented in Monticello Nuclear Generating Plant Emergency Action Levels, (EPLAN-04).

Commitments in the proposed MNGP Plan Annex related to the establishment and maintenance of a standard emergency classification and action level scheme do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

E. Notification Methods and Procedures

Procedures have been established for notification, by the licensee, of State and local response organizations and for notification of emergency personnel by all organizations; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway EPZ have been established.

Element Analysis:

E.1 The proposed SEP MNGP Plan Annex states that the site-specific state and county entities notified of a declared emergency at MNGP are as follows:

- State of Minnesota
- Wright County
- Sherburne County

Commitments in the proposed MNGP Plan Annex related to the establishment of provisions for notification of response organizations do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

E.2 The proposed SEP MNGP Plan Annex states that MNGP maintains an Alert and Notification System (ANS) that provides the administrative and physical means to complete the initial alerting and initiate notification of the public within the plume exposure pathway EPZ within 15 minutes of the time that State and local officials are notified. The ANS system consists of a primary and backup activation and monitoring of outdoor warning sirens, primary and backup initiation of the Emergency Alert System (EAS), primary and backup initiation of the Integrated Public Alert and Warning System (IPAWS), and county auto-dial notification systems for special populations.

Activation of the ANS begins with a protective action recommendation (PAR) of evacuation or sheltering by the MNGP Emergency Director/Manager. The Minnesota Division of Homeland Security and Emergency Management (HSEM) is responsible for coordinating the recommendation and making it a decision with appropriate approvals and assigning siren activation times and EAS activation times. The Sherburne and Wright County Sheriff's Offices are responsible for activation of the outdoor warning sirens.

The sirens provide essentially 100% coverage of the populated area within the 10-mile EPZ. In the event that a siren is not working, affected areas will still be alerted through the use of IPAWS.

Detailed information on the FEMA approved system used to alert and notify the general public is maintained in the Monticello Nuclear Generating Plant ANS Design Report (EPLAN-10)

Commitments in the proposed MNGP Plan Annex related to the description of the ANSs used to alert and notify the general public within the plume exposure pathway EPZ and methods of activation do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

F. Emergency Communications

Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

Element Analysis:

F.1 The proposed SEP MNGP Plan Annex states that provisions exist for continuous communications with applicable onsite and offsite emergency organizations.

The available communication systems are illustrated in Table F.1.b, *MNGP Communications Matrix*. Refer to Attachment 5 for a comparative table of communication methods and interfaces and associated change justification.

Commitments in the proposed MNGP Plan Annex related to the description of the communication methods that may be used when contacting applicable organizations do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

F.3 The proposed SEP MNGP Plan Annex states that systems used to communicate with the state of Minnesota, Wright County, and Sherburne County warning points will be tested monthly.

ANS siren silent testing is completed on a weekly frequency and activation testing is completed on a monthly frequency.

Commitments in the proposed MNGP Plan Annex related to the identification of testing methods and frequency for communication systems used for identified communication functions do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

H. Emergency Facilities and Equipment

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

Element Analysis:

H.1 The proposed SEP MNGP Plan Annex states that the Technical Support Center (TSC) is located on the first level of the Plant Engineering Building (PEB).

The MNGP TSC has the following capabilities:

- Working space for about twenty-five people which is approximately 5700 sq ft of floor space.
- Shielding, filtered ventilation, and access to thyroid blocking agents to provide habitability under accident conditions.
- Area radiation and continuous airborne monitors are provided to monitor radiological conditions in the facility.

- Primary and backup communication links to onsite and offsite emergency response centers.
- Access to plant procedures, documents, and records.
- The capability to record and display plant system, radiological, and meteorological parameters.

Commitments in the proposed MNGP Plan Annex related to establishing a TSC do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

H.2 The proposed Xcel Energy SEP MNGP Plan Annex states that the OSC is located in designated areas on the first and second levels of the Plant Administration Building and is provided with the necessary equipment and communication links to support OSC emergency response actions.

Commitments in the proposed MNGP Plan Annex related to establishing a OSC do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

H.3 The proposed MNGP Plan Annex states that the MNGP Training Building has been designated for use as a near site location for the NRC and other off-site agency staff.

This location provides space for an NRC site team and Federal/state/local responders, space for conducting briefings with emergency response personnel, communication with other licensee and offsite emergency response facilities, access to plant radiological information and access to copying equipment and office supplies.

Refer to Enclosure 4 for an evaluation and analysis of the proposed combined EOF.

H.4 The proposed MNGP Plan Annex states that the MNGP Training Building has been designated as the MNGP alternative facility.

Commitments in the proposed MNGP Plan Annex related to establishing an alternative facility do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

H.8 The proposed MNGP Plan Annex states that the following site-specific provisions are made to acquire data from offsite monitoring and analysis equipment.

<u>Laboratory Facilities</u>

MNGP environmental sampling is performed in accordance with MNGP Off-Site Dose Calculation Manual (ODCM) and Technical Specifications.

If needed, additional offsite laboratory services are available from PINGP or provided by GEL Laboratories as stated in section B.5-2.C, Contractor Support.

Commitments in the proposed MNGP Plan Annex related to establishing site-specific provisions acquire data from offsite monitoring and analysis equipment do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

J. Protective Response

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. ETEs have been developed by applicants and licensees. Licensees shall update the ETEs on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

Element Analysis:

J.2 The proposed MNGP Plan Annex states that evacuation is coordinated with the OROs and may be to individual homes or designated offsite locations, Xcel Energy Monticello Service Center or Sherco Generation Plant, should radiological monitoring of site personnel be needed. Pre-established primary and alternate routes for each location have been established and are maintained in implementing procedures.

Commitments in the proposed MNGP Plan Annex related to providing and coordinating evacuation routes and transportation for onsite individuals do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

J.8 The proposed MNGP Plan Annex states that the MNGP site specific ETE report is documented in, Monticello Nuclear Generating Plant Evacuation Time Estimates, EPLAN-06.

Commitments in the proposed MNGP Plan Annex related to providing and coordinating evacuation routes and transportation for onsite individuals do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

J.10 The proposed MNGP Plan Annex states that maps and other information showing site specific evacuation routes, evacuation areas, reception centers in host areas, and shelter areas are contained in the MNGP ETE report, EPLAN-06.

Maps and other information showing population distribution around MNGP, by evacuation area, are contained in the MNGP ETE report, EPLAN-06.

Commitments in the proposed MNGP Plan Annex related to including maps, charts, or other information that demonstrate evacuation routes,

evacuation arears, reception centers, and host areas and shelter areas for the plume exposure pathway EPZ, do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

L. Medical and Public Health Support

Arrangements are made for medical services for contaminated injured individuals.

Element Analysis:

L.2 The proposed MNGP Plan Annex states that the primary and backup offsite medical facilities to treat contaminated injured personnel from MNGP are:

Primary – CentraCare Health-Monticello

Backup – CentraCare St. Cloud Hospital

Commitments in the proposed MNGP Plan Annex related to the description of arrangements for the medical treatment of contaminated, injured onsite personnel and those onsite personnel who have received significant radiation exposures and/or significant uptakes of radioactive material do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

L.4 The proposed MNGP Plan Annex states that arrangements for transportation of radiologically contaminated casualties have been made with the CentraCare Health-Monticello Ambulance Service.

Commitments in the proposed MNGP Plan Annex related to the arrangement for the transportation of contaminated, injured individuals and the means to control contamination while transporting victims of radiological incidents to medical support facilities and the decontamination of transport vehicle following use do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

P. Responsibility for the Planning Effort: Development, Periodic Review, and Distribution of Emergency Plans

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

Element Analysis:

P.6 The proposed MNGP Plan Annex states that external emergency plans specific to the support of MNGP include the following:

- Wright County Emergency Response Plan
- Sherburne County Emergency Response Plan-

Commitments in the proposed MNGP Plan Annex related to the listing of annexes, appendices, and supporting plans and their originating agency do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

P.7 The proposed MNGP Plan Annex states that Attachment C of the SEP provides a listing of the implementing procedures required to maintain and implement the emergency plan, and the section(s) of the emergency plan implemented by each procedure.

Commitments in the proposed MNGP Plan Annex related to including an appendix containing a listing by title of the procedures required to maintain and implement the emergency plan do not represent a material change from the current MNGP or Corporate Offsite Emergency Plan commitments.

3.0 CONCLUSION

The proposed changes continue to support the functional areas of the Emergency Plan, continue to ensure the protection of the health and safety of the public and site personnel, and will not present a significant burden to the on-shift personnel.

ENCLOSURE 2

ATTACHMENT 1

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

MONTICELLO PLAN ANNEX

(EPLAN-02)

(16 Pages Follow)

Xcel Energy®	EPLAN-02	Revision: 0
Emergency Preparedness Licensing Document		Page 1 of 16
Title:	**Monticello Plan Annex**	
Approval: **XXXX**		

Table of Contents

A. ASSIGNMENT OF RESPONSIBILITY

Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the EPZs have been assigned, the emergency responsibilities of the various supporting organization have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

Regulatory References: 10 CFR 50.47(b)(1); 44 CFR 350.5(a)(1)

A.1	The Federal, state, local and tribal governments, licensee, and other private sector organization that comprise the overall response for the EPZs are identified
A.1.a	The organizations having an operational role specify their concept of operations and relationship to the total effort.

County Organizations

The county and municipal governments with an operational role within the Monticello Nuclear Generating Plant (MNGP) 10-mile EPZ as depicted in Figure 1 are:

- Wright County
- Sherburne County

The county governments having an operational role within the MNGP 50-mile Ingestion Pathway Zone (IPZ) as depicted in Figure 2 are:

Minnesota			
Anoka	Isanti	Morrison	Sibley
Benton	Kanabec	Pine	Stearns
Carver	Kandiyohi	Ramsey	Washington
Chisago	McLeod	Renville	Wright
Dakota	Meeker	Scott	
Hennepin	Mille Lacs	Sherburne	

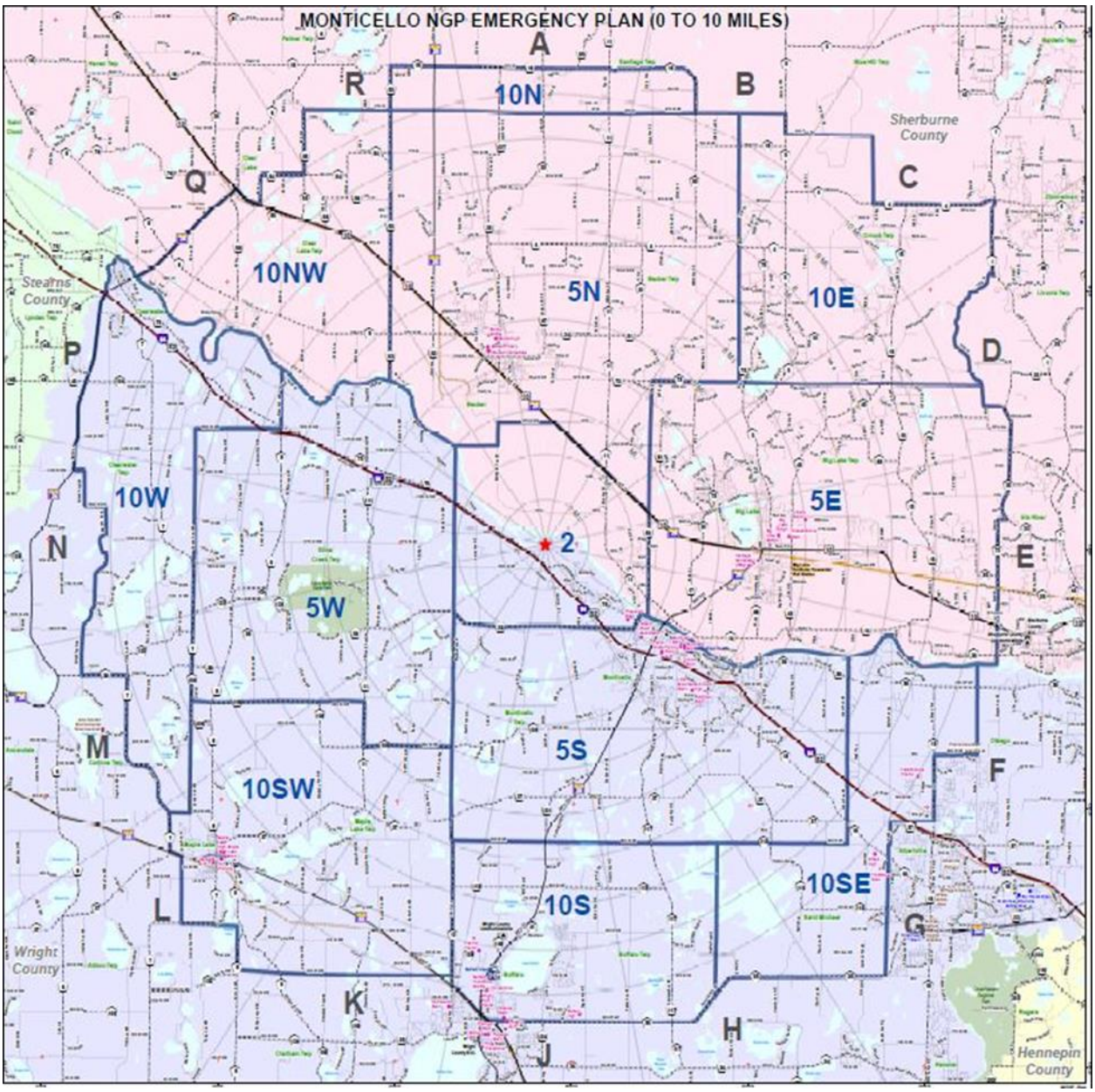

Figure 1 – MNGP 10-Mile Plume Exposure Pathway Zone (EPZ)

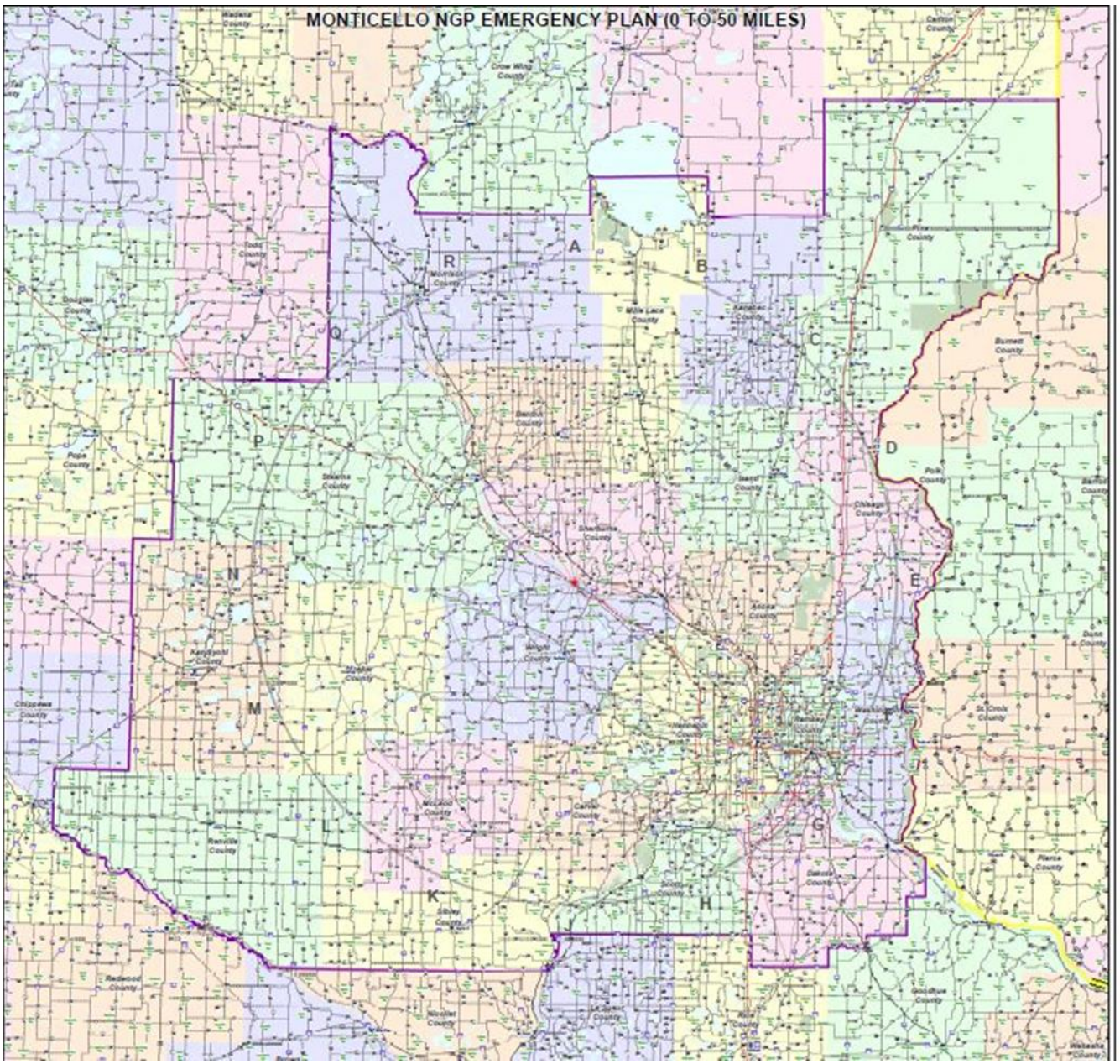

Figure 2 – MNGP 50-Mile Ingestion Pathway (IPZ)

A.4	Written agreements with the support organizations having an emergency response role within the EPZs are referenced. The agreements describe the concept of operations, emergency response measures to be provided, mutually acceptable criteria for their implementation, and arrangements for exchange of information.

Site specific Letters of Agreement (LOAs) are maintained by Xcel Energy with the following organizations:

- GE Hitachi Nuclear Energy (GEH)
- CentraCare – Monticello (CC-M)
- CentraCare St. Cloud Hospital (SCH)
- Sherburne County Sheriff's Department and Emergency Services Division
- Wright County
- City of Monticello

Support for HAB events is included as appropriate.

B. EMERGENCY RESPONSE ORGANIZATION (ERO)

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

Regulatory References: 10 CFR 50.47(b)(2); 44 CFR 350.5(a)(2);
10 CFR Part 50, Appendix E.IV.A

B.1	The emergency plan specifies how the requirements of 10 CFR 50.47(b)(2) and the applicable sections of Appendix E to 10 CFR Part 50 are met.
B.1.a	The site-specific emergency response organization (ERO) is developed. Note that while other site programs, such as operations, fire response, rescue and first aid, and security, may be controlled via other licensing documents, it is only when these personnel are assigned EP functions that they become part of this regulatory standard. Consideration is given to ensure that EP functions are not assigned to individuals who may have difficulties performing their EP function(s) simultaneously with their other assigned (non-EP) duties. Appendix E to 10 CFR Part 50 requires licensees to perform an on-shift staffing analysis to ensure on-shift staff can support the EP functions assigned, as well as other assigned duties.

The MNGP on-shift staffing analysis has been developed in accordance with 10 CFR 50 Appendix E.IV.A.9 and NEI 10-05.

The MNGP On-Shift Staffing Analysis Report (EPLAN-08) is maintained in the Document Records Management System.

B.5	The external organizations, including contractors, that may be requested to provide technical assistance to and augmentation of the ERO, as applicable, are specified.

Contractor Support

- Arcadis: Arcadis will provide personnel and/or consulting services to MNGP as needed.
- GE Hitachi Nuclear Energy (GEH): GEH will provide assistance and services to MNGP through the BWR Nuclear Emergency Support Program as identified in Services Information Letter SIL No. 324.
- GEL Laboratories, LLC: GEL will provide personnel and laboratory support services to MNGP as needed.

D. EMERGENCY CLASSIFICATION SYSTEM

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Regulatory References: 10 CFR 50.47(b)(4); 44 CFR 350.5(a)(4);
10 CFR Part 50 Appendix E.IV.B and C

D.1	A standard emergency classification and action level scheme is established and maintained. The scheme provides detailed EALs for each of the four ECLs in Section IV.C.1 of Appendix E to 10 CFR Part 50.

The MNGP EAL scheme is documented in Monticello Nuclear Generating Plant Emergency Action Levels, (EPLAN-04).

E. NOTIFICATION METHODS AND PROCEDURES

Procedures have been established for notification, by the licensee, of State and local response organizations and for notification of emergency personnel by all organizations; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway EPZ have been established.

Regulatory References: 10 CFR 50.47(b)(5); 44 CFR 350.5(a)(5)

E.1	The mutually agreeable process for direct and prompt notification of response organizations, aligned with the emergency classification and action level scheme, is described.
E.1.a	Provisions for notification of response organizations are established including the means for verification of messages.

The site-specific state and county entities notified of a declared emergency at MNGP are as follows:

- State of Minnesota
- Wright County
- Sherburne County

E.2	The alert and notification systems (ANSs) used to alert and notify the general public within the plume exposure pathway EPZ and methods of activation are described. This description includes the administrative and physical means, the time required for notifying and providing prompt instructions to the public within the plume exposure pathway EPZ, and the organizations or titles/positions responsible for activating the system.

MNGP maintains an ANS that provides the administrative and physical means to complete the initial alerting and initiate notification of the public within the plume exposure pathway EPZ within about 15 minutes of the time that State and local

officials are notified. The ANS system consists of a primary and backup activation and monitoring of outdoor warning sirens, primary and backup initiation of the Emergency Alert System (EAS), primary and backup initiation of the Integrated Public Alert and Warning System (IPAWS), and county auto-dial notification systems for special populations.

Activation of the ANS begins with a protective action recommendation (PAR) of evacuation or sheltering by the MNGP Emergency Director/Manager. The Minnesota Division of Homeland Security and Emergency Management (HSEM) is responsible for coordinating the recommendation and making it a decision with appropriate approvals and assigning siren activation times and EAS activation times. The Sherburne and Wright County Sheriff's Offices are responsible for activation of the outdoor warning sirens.

The sirens provide essentially 100% coverage of the populated area within the 10-mile EPZ. In the event that a siren is not working, affected areas will still be alerted through the use of IPAWS.

Detailed information on the FEMA approved system used to alert and notify the general public is maintained in the Monticello Nuclear Generating Plant ANS Design Report (EPLAN-10).

F. EMERGENCY COMMUNICATIONS

Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

Regulatory References: 10 CFR 50.47(b)(6); 44 CFR 350.5(a)(6).

F.1	Each principal response organization establishes redundant means of communication and addresses the following provisions:
F.1.b	Communication with applicable organizations to include a description of the methods that may be used when contacting each organization.

Provisions exist for communications with applicable onsite and offsite emergency organizations. The available communication systems are illustrated in Table F.1.b, MNGP Communications Matrix.

Table F.1.b – MNGP Communications Matrix

	Commercial Telephones	Plant/Xcel Energy Phones	Mobile Devices	Plant Page System	ERDS	Facsimile and/or Scan/E-mail	Xcel Radio Network	Dedicated Telephone	ERO Notification System	Satellite Phones	USNRC - Communications
Control Room	X	X		X	X	X	X		X	X	X
TSC	X	X		X	X	X	X	X	X	X	X
OSC	X	X		X			X			X	
EOF	X	X	X			X	X			X	X
NRC Near Site Facility	X	X									X
MNGP Alternative Facility	X	X	X	X		X	X		X		X
Prairie Island NGP	X	X				X					
Plant Areas	X	X		X			X				
Field Monitoring Teams			X				X			X	
MNGP Key Personnel	X	X	X						X		
MNGP Security	X	X		X		X	X				X
Xcel Energy System Dispatcher	X	X					X	X			
MN/HSEM – EOC	X					X	X	X		X	
MN/State Patrol	X						X			X	
Wright Co. Sheriff	X					X	X			X	
Wright Co. EOC	X					X				X	
Monticello Police/Fire	X										
Monticello Hospital	X										
Monticello City Hall	X										
Sherburne Co. Sheriff	X					X	X			X	
Sherburne Co. EOC	X					X				X	
USNRC/HQ	X				X	X					X
USNRC/REG III	X										X
USNRC/Resident Insp.	X	X	X	X							

F.3	The testing method and periodicity for each communication system used for the functions identified in evaluation criteria E.2, F.1, and F.2 are described.

Systems used to communicate with the state of Minnesota, Wright County, and Sherburne County warning points will be tested monthly.

ANS siren silent testing is completed on a weekly frequency and activation testing is completed on a monthly frequency.

H. EMERGENCY FACILITIES AND EQUIPMENT

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

Regulatory References: 10 CFR 50.47(b)(8); 44 CFR 350.5(a)(8)

H.1	A TSC is established, using current Federal guidance, from which NPP conditions are evaluated and mitigative actions are developed.

The Technical Support Center (TSC) is located on the first level of the Plant Engineering Building (PEB).

The MNGP TSC has the following capabilities:

- Working space for about twenty-five people which is approximately 5700 sq ft of floor space.
- Shielding, filtered ventilation, and access to thyroid blocking agents to provide habitability under accident conditions.
- Area radiation and continuous airborne monitors are provided to monitor radiological conditions in the facility.
- Primary and backup communication links to onsite and offsite emergency response centers.
- Access to plant procedures, documents, and records.
- The capability to record and display plant system, radiological, and meteorological parameters.

H.2	An OSC is established, using current Federal guidance, from which repair team activities are planned and teams are dispatched to implement actions.

The Operational Support Center (OSC) is located in designated areas on the first and second levels of the Plant Administration Building and is provided with the necessary equipment and communication links to support OSC emergency response actions.

H.3	An EOF is established, using current Federal guidance, as the primary base of emergency operations for the licensee during a radiological incident. The EOF facilitates the management and coordination of the overall emergency response, including the sharing of information with Federal, state, local and tribal government authorities.
H.3.a	For an EOF that is located more than 25 miles away from the NPP site, provisions are made for locating NRC and offsite responders closer to the NPP site.

The MNGP Training Building has been designated for use as a near site location for the NRC and other off-site agency staff.

This location provides space for an NRC site team and Federal/state/local responders, space for conducting briefings with emergency response personnel, communication with other licensee and offsite emergency response facilities, access to plant data and radiological information, and access to copying equipment and office supplies.

H.4	An alternative facility (or facilities) is established, using currently provided and/or endorsed guidance, which would be accessible even if the NPP site is under threat of or experiencing hostile action.

The MNGP Training Building has been designated as the MNGP alternative facility.

H.8	Provisions are made to acquire data from offsite monitoring and analysis equipment, including data on geophysical phenomena (e.g., meteorological, hydrologic, and seismic monitors) and radiological data (e.g., from FMTs, environmental dosimeters, and laboratory analyses).

<u>Laboratory Facilities</u>

MNGP environmental sampling is performed in accordance with MNGP ODCM and Technical Specifications.

If needed, additional offsite laboratory services are available from PINGP or provided by GEL Laboratories as stated in section B.5-2.C, Contractor Support.

J. PROTECTIVE RESPONSE

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. ETEs have been developed by applicants and licensees. Licensees shall update the ETEs on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

Regulatory References: 10 CFR 50.47(b)(10); 44 CFR 350.5(a)(10)

J.2	Provisions are made and coordinated with appropriate offsite entities for evacuation routes and transportation for onsite individuals to a suitable offsite location. Selection of location considers the potential for inclement weather, high traffic density, and potential radiological conditions. Alternate location(s) and route(s) are identified.

Evacuation is coordinated with the OROs and may be to individual homes or designated offsite locations, Xcel Energy Monticello Service Center or Sherco Generation Plant, should radiological monitoring of site personnel be needed. Pre-established primary and alternate routes for each location have been established and are maintained in implementing procedures.

J.8	The latest ETEs are:
J.8.a	Incorporated either by reference or in their entirety into the emergency plan.

The MNGP site specific ETE report is documented in, Monticello Nuclear Generating Plant Evacuation Time Estimates, EPLAN-06.

J.10	Plans include maps, charts, or other information that demonstrate the following for the plume exposure pathway EPZ:
J.10.a	Evacuation routes, evacuation areas, reception centers in host areas, and shelter areas.

Maps and other information showing site specific evacuation routes, evacuation areas, reception centers in host areas, and shelter areas are contained in the MNGP ETE report, EPLAN-06.

J.10.b	Population distribution around the NPP site by evacuation areas.

Maps and other information showing population distribution around MNGP, by evacuation area, are contained in the MNGP ETE report, EPLAN-06.

L. MEDICAL AND PUBLIC HEALTH SUPPORT

Arrangements are made for medical services for contaminated injured individuals.

Regulatory Reference: 10 CFR 50.47(b)(12); 44 CFR 350.5(a)(12)

L.2	Arrangements for the medical treatment of contaminated, injured onsite personnel and those onsite personnel who have received significant radiation exposures and/or significant uptakes of radioactive material are described. These arrangements include the following components:
L.2.b	Primary and backup offsite medical facilities.

The primary and backup offsite medical facilities to treat contaminated injured personnel from MNGP are:

Primary – CentraCare Health-Monticello

Backup – CentraCare St. Cloud Hospital

L.4	Each organization arranges for the transportation of contaminated, injured individuals and the means to control contamination while transporting victims of radiological incidents to medical support facilities and the decontamination of transport vehicle following use.

Arrangements for transportation of radiologically contaminated casualties have been made with the CentraCare Health-Monticello Ambulance Service.

P. RESPONSIBILITY FOR THE PLANNING EFFORT: DEVELOPMENT, PERIODIC REVIEW AND DISTRIBUTION OF EMERGENCY PLAN

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

Regulatory References: 10 CFR 50.47(b)(16); 44 CFR 350.5(a)(16)

P.6	A listing of annexes, appendices, and supporting plans and their originating agency is included in the emergency plan.

External emergency plans specific to the support of MNGP include the following:

- Wright County Emergency Response Plan
- Sherburne County Emergency Response Plan

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.

Appendix C of the Standard Emergency Plan (SEP) provides a listing of the MNGP implementing procedures required to maintain and implement the emergency plan, and the section(s) of the emergency plan implemented by each procedure.

REFERENCES

1. 10CFR50.47, Emergency Plans
2. 10CFR50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities
3. NUREG-0654/FEMA-REP-1, REV. 2; Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants

ENCLOSURE 2

ATTACHMENT 2

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

XCEL ENERGY CORPORATE EMERGENCY PLAN JUSTIFICATION MATRIX

(79 Pages Follow)

Xcel Energy Corporate Emergency Plan – Change Justification Matrix

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
	Section 1.0 Purpose	**Section I – Introduction**	
2.	1.1		
3.	In accordance with license conditions, 10 CFR Part 50 and Nuclear Regulatory Commissioned (NRC) regulatory guidance, the Northern States Power Company, a Minnesota Corporation (NSPM) d/b/a Xcel Energy has developed and implemented emergency response plans for both of its operating nuclear power sites' and off-site response organizations.	**Section I, Introduction, Purpose** In accordance with license conditions, 10 CFR Part 50, and NRC Regulatory Guidance, the Standard Emergency Plan (SEP) provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to power plants operated by Xcel Energy, and plant employees. Xcel Energy operates the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP).	Wording modified to eliminate references to Offsite Plans controlled through FEMA approval of those plans.
4.	These combined plans constitute Monticello and Prairie Island's Emergency Response Plan.	**Section I, Introduction, Scope** Xcel Energy Chief Nuclear Officer has overall responsibility for maintaining a state of readiness to implement this Plan for the protection of plant personnel, the general public, and property from hazards associated with nuclear power generation facility operated by the company. The SEP describes the organization, facilities, training, and maintenance of both onsite and offsite facilities and equipment available to implement the plan.	Terminology updated to reflect incorporation of the Standard Plan concept as proposed by this submittal. Wording aligns scope with NUREG-0654 terminology.
5.	NSPM is a subsidiary of Xcel Energy Corporation and operates Monticello and Prairie Island Nuclear Power Sites. As asset owner Xcel Energy retains all owner obligations.	**Section I, Introduction, Purpose** The Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy	Terminology updated to reflect the Standard Plan concept applicable to both sites proposed by this submittal.
6.	1.2		

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7.	In support of the planning effort at these fixed nuclear facilities, supplemental emergency response plans have been developed by organizations outside of and within the NSPM/Xcel Energy. These include response plans developed by the States of Minnesota, Wisconsin (a state contiguous to NSPM/Xcel Energy Prairie Island site) and Prairie Island Indian Community.	**Section I, Introduction, Scope** There are supporting and complementing emergency plans, including those of federal agencies, the states of Minnesota and Wisconsin, the Prairie Island Indian Community and risk counties.	Language consolidated as it applies to related offsite plans. No change in the actual offsite plans themselves.
8.	Response plans have also been developed by counties (in both states) which are within the emergency planning zones at either Monticello or Prairie Island Nuclear Generating plants.		
9.	Response arrangements have been developed with various service oriented organizations in support of both sites. These include such entities as hospitals, ambulance services, federal radiological emergency response teams, contractor laboratories, vendors and consultants. These arrangements are documented in a list of "letters of agreement" attached in Attachment 5 to this plan.	**Section C.2.d** Agreements with state and county response organizations have been established through the integrated development of their respective emergency plans. **Section C.4** Contract Laboratories Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide environmental sample analysis services and are listed in the site-specific annexes.	No change in responsibilities for establishing and maintaining agreements with various supporting agencies. Language aligned to Standard Plan and organization as defined in NUREG-0654, Revision 2.
10.	NSPM/Xcel Energy Chief Nuclear Officer is ultimately responsible for ensuring a well prepared and adequately staffed Emergency Response Organization (ERO) is in place for both the On-site and Off-site organizations.	**Section I, Introduction, Scope** Xcel Energy Chief Nuclear Officer has overall responsibility for maintaining a state of readiness to implement this Plan for the protection of plant personnel, the general public, and property from hazards associated with nuclear power generation facility operated by the company.	Sections consolidated in the proposed Emergency Plan to provide a clear statement of responsibility. No change in practice or intent was made.
11.	NSPM/Xcel Energy's Chief Nuclear Officer ensures this by requiring strict compliance to the Emergency Plans.		

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12.	This plan can be implemented in response to emergencies at either Monticello or Prairie Island nuclear facilities. It coordinates the resources of the NSPM/Xcel Energy and other supporting departments.	**Section I. Introduction, Purpose** In accordance with license conditions, 10 CFR Part 50, and NRC Regulatory Guidance, the Standard Emergency Plan (SEP) provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to power plants operated by Xcel Energy, and plant employees. Xcel Energy operates the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP).	Applicability language modified to align with Standard Plan concept. No change in overall applicability.
13.	The emergency response planning effort consists of three phases: 1. The Response 2. Offsite Assistance 3. The Recovery	No equivalent statement	Original language is part of the Planning Basis for Section I of NUREG-0654, Revision 1. Adoption of the Standard Classification scheme (Section D of the Standard Plan) provides the overall response concept.
14.	The Response Phase is that period of time immediately following the classification of an emergency condition. Responses during this phase are those actions which are taken by site personnel to reduce consequences of the emergency condition. Each site plan directs actions during this period and is designed to interface with other response plans if it becomes necessary to utilize outside assistance.	No equivalent statement	Original language is part of the Planning Basis for Section I of NUREG-0654, Revision 1. Adoption of the Standard Classification scheme (Section D of the Standard Plan) provides the overall response concept.
15.	The Offsite Assistance Phase commences when organizations other than the affected sites are used to assist the site in response to the emergency. The response effort described in this Plan is designed for the Offsite Assistance Phase.	No equivalent statement	Original language is part of the Planning Basis for Section I of NUREG-0654, Revision 1. Adoption of the Standard Classification scheme (Section D of the Standard Plan) provides the overall response concept.

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16.	The Monticello and Prairie Island Offsite Nuclear Emergency Plan organizes the total resources of the NSPM/Xcel Energy to facilitate support of the affected site. Activation of the Monticello and Prairie Island Offsite Response Organization (ORO), and state, federal, and local governmental response organizations are associated with this phase.	**Section I, Introduction, Purpose** In accordance with license conditions, 10 CFR Part 50, and NRC Regulatory Guidance, the Standard Emergency Plan (SEP) provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to power plants operated by Xcel Energy, and plant employees. Xcel Energy operates the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP).	Language modified to align with the Standard Plan concept. No change was made to the responsibility of NSPM in response to activation of the Emergency Plan.
17.	The Recovery Phase commences when the Emergency Director, Emergency Manager, Plant Manager, and the Recovery Manager agree that all Emergency Organization activities in progress can be safely transferred to the Recovery Organization, and a punch list of short-term and long-term projects have been identified and prioritized, and consultation has occurred with the NRC.	**Section M.3** Implementing procedures provide guidance to directly terminate from an Unusual Event, Alert and Site Area Emergency with no long-term plant damage classifications when a normal outage organization is able to address any plant issues, or to transition to a recovery organization. The Emergency Director in consultation with the Emergency Manager, determines when conditions warranting an emergency declaration have passed and steps will be taken to terminate directly from the event or transition to a recovery organization.	Recovery requirements and structure including the organization are provided as Section M of the Standard Plan.

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18.	The methodology for the transition to the Recovery Phase is specified in the site Emergency Plan Implementing Procedures.	**Section M.3** Implementing procedures provide guidance to directly terminate from an Unusual Event, Alert and Site Area Emergency with no long-term plant damage classifications when a normal outage organization is able to address any plant issues, or to transition to a recovery organization. The Emergency Director in consultation with the Emergency Manager, determines when conditions warranting an emergency declaration have passed and steps will be taken to terminate directly from the event or transition to a recovery organization. Recovery from an emergency situation is guided by the following principles: • The protection of the public health and safety is the foremost consideration in formulating recovery plans. • Public officials would be kept informed of recovery plans so that they can properly carry out their responsibilities to the public. • Periodic information would be provided to the news media so that they can provide information to the public regarding recovery plans and progress made.	Recovery requirements and structure including the organization are provided as Section M of the Standard Plan.

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19.	The methodology for the transition to the Recovery Phase is specified in the site Emergency Plan Implementing Procedures.	**Section M.3, (continued)** • Periodic status reports would be given to company employees at other locations and to government and industry representatives. The Emergency Manager will take the following steps to inform members of the EOF, site organization, and off-site agencies that recovery operations are being initiated and that activities associated with bringing the plant to a safe shutdown condition are completed: • Develop a brief message as to the time and date of recovery operations initiation as well as any necessary organizational realignments.	Recovery requirements and structure including the organization are provided as Section M of the Standard Plan.
20.	**Section 2.0 Applicability**		
21.	2.1		
22.	This plan can be implemented in response to emergency at either Monticello or Prairie Island Nuclear Generating Plants.	**Section I, Introduction, Purpose** In accordance with license conditions, 10 CFR Part 50, and NRC Regulatory Guidance, the Standard Emergency Plan (SEP) provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to power plants operated by Xcel Energy, and plant employees. Xcel Energy operates the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP).	No change in coverage of the existing plans. Standard Plan logic consolidated to align with single plan proposal.
23.	**Section 3.0 Responsibilities**		
24.	Monticello and Prairie Island Nuclear Generating Plants will activate their respective emergency organization independent of offsite assistance.	No equivalent statement	Intent of the original site plans was to activate separately without dependence on any offsite licensee personnel. Standard Plan has no equivalence since corporate personnel are now an integral part of the ERO.

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25.	The site staff is responsible for taking the immediate actions to mitigate the emergency and limit the adverse effects.	**Section B.1.a** A description of the normal site operating organization is contained in each sites USAR. The requirements for on-shift operations staff, security force staff, and fire brigade and first aid staff are controlled by site-specific Technical Specifications and other site-specific licensing and administrative documents. Positions from these departments are contained in the emergency plan only when assigned an EP function that is performed during an event. Site-specific on-shift staffing analysis reports are developed in accordance with 10 CFR 50 Appendix E.IV.A.9 and NEI 10-05. (EPLAN-08, EPLAN-09)	Intent of the original site plans was to activate separately without dependence on any offsite licensee personnel. Standard Plan has no equivalence since corporate personnel are now an integral part of the ERO.
26.	The time taken to completely activate the Monticello or Prairie Island Emergency Response Organization will not adversely affect the site's response to the emergency condition.	No equivalent statement	Statement deleted and specific ERO Activation times are aligned with NUREG-0654, Revision 2, and documented in the Standard Plan Table B-1.
27.	The Monticello and Prairie Island Offsite Emergency Response Organization is shown in Attachment 1. Methods are established in procedures to ensure that the necessary personnel are available to staff required positions or that alternates are specified.	**Section B.1.a** Figures B-1, B-2, B-3, B-4 **Section F.1.c,** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	Figures contained in Section B defines the ERO. The detailed analysis of the augmented ERO is provided in Enclosure 1 Section B.

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28.	The following is a description of key members of the Monticello and Prairie Island Offsite Emergency Response Organization. The site emergency organizations are described in the site plans.	**Section B.1.a** The ERO is composed of the following positions and assigned responsibilities:	Language consolidated. No change in intent.
29.	Section 3.1 Responsibilities of NSPM/Xcel Energy's Offsite Emergency Response Organization Positions	**Section B.1.a**	The detailed comparison of the augmented ERO is provided in Enclosure 1 Section B.
30.	3.1.1 Xcel Communications	No equivalent description	Corporate Plan maintained a general description of the Xcel Communications group. Standard Plan provides the description of the JIC and the response as defined in the Standard Emergency Plan.
31.	This group is represented by the Xcel Energy Communications staff.	**Section G.** The JIC is staffed at an Alert or higher classification by Xcel Energy Corporate Communications personnel to ensure coordination with affected agencies and provide public information to the media and the public.	Language modified to focus on the Emergency Response to a classified event. Statement of purpose and activation requirements are specifically identified in the Standard Plan.
32.	Staffing of these positions is ensured by use of a call list of qualified designees.	**Section B.1.a, Figure B-4** **Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO.	Language modified to identify JIC as designated 90-minute responders within the ERO callout.

33.	The Director of Communications is responsible for the management of NSPM/Xcel Energy public information efforts and to advise NSPM/Xcel Energy Executive Management on public affairs. The responsibilities and authorities are listed below: • Provide a media representative for communication with the various media personnel. • Ensure that requests for public information by NSPM/Xcel Energy Executive Management are acted upon. • Coordinate the efforts of ERO communications personnel at corporate offices and at the state EOC/JIC. • Ensure that there is a timely exchange of information among spokespersons for the responding agencies and that there are coordinated arrangements for dealing with rumors. • Ensure that requests for communications resources are acted upon in a timely fashion. • Ensure information flow to appropriate federal, state and local government officials not directly involved in the emergency response effort. • If requested by the Emergency Manager, consider dispatching a Communications Representative to the site to support local Media related issues.	**Section B.1.a** JIC Manager • Coordinate the efforts of Xcel Energy personnel at the state EOC/JIC. • Provide oversight for public information requests.	Language modified to define responsibilities of the ERO members responding to the JIC. Non-responding personnel are not assigned responsibilities.

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34.	3.1.2 Executive Spokesperson	**Section B.1.a** Executive Spokesperson • Serve as the Xcel Energy spokesperson for major media meetings and conferences held at the Minnesota state EOC/JIC. • Supply information to ERO communications personnel who develop media releases at the state EOC/JIC. • Represent Xcel Energy at the state EOC/JIC by interfacing with state officials. • Ensure adequate liaison occurs between Xcel Energy representatives and state and county management. • Establish 24-hour shift coverage for JIC Staff.	Language provides more specific expectations for the position. No change in intent of the responder's actions as the integrated JIC as evolved.
35.	The Executive Spokesperson with the assistance of Technical Resource personnel will be responsible for directing the efforts of NSPM/Xcel Energy personnel at the State EOC and the Joint Information Center. Additionally, this individual will be the designated NSPM/Xcel Energy Spokesperson in attendance for media conferences.		
36.	The individual designated to fill this position will have the following responsibilities: • Serve as the NSPM/Xcel Energy spokesperson for major media meetings and conferences held at the Minnesota state EOC/JIC. • Supply information to ERO communications personnel who develop media releases at the state EOC/JIC. • Represent NSPM/Xcel Energy at the state EOC/JIC by interfacing with state officials. • Ensure adequate liaison occurs between NSPM/Xcel Energy representatives and state and county management. • Serve on the JIC Management Committee. • Establish 24-hour shift coverage for JIC Staff.		
37.	3.1.3 Technical Resource Staff	**Section B.1.a, p. 18** Technical Advisor	
38.	The individuals designated to fill this position will have the following responsibilities: 1. Assist the Executive Spokesperson in supplying information to the ERO communications personnel located at the JIC/EOC.	• Brief the Executive Spokesperson on plant conditions and technical aspects of the event.	Responsibilities revised to align with evolution of a single voice response for the utility. Technical Advisor focus in the Standard Plan is advisor rather than potential spokesperson.

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39.	2. Act as the Executive Spokesperson in his or her absence. 3. As an NSPM/Xcel Energy technical representative, assist other personnel at the JIC/EOC.	No equivalent statement	Responsibilities revised to align with evolution of a single voice response for the utility. Technical Advisor focus in the Standard Plan is advisor rather than potential spokesperson.
40.	3.1.4 State Liaison	**Section B.1.a** State Liaison	
41.	The State Liaison Representative works for the Executive Spokesperson and is at the Executive Spokespersons disposal to provide Liaison between NSPM/Xcel Energy and the State Agencies.	**Figure B-4, JIC Organization**	No Change. JIC Organization as defined in Section B-4 designates reporting chain to the Executive spokesperson.
42.	The State Liaison Representative will have the following responsibilities: 1. Provide an interface between NSPM/Xcel Energy and various state agencies of both Minnesota and Wisconsin. 2. Assist the state in understanding NSPM/Xcel Energy's response efforts to the emergency situation. 3. Facilitate the answering of any questions the state has concerning NSPM/Xcel Energy's response efforts. 4. Ensure that information being provided to the state accurately reflects the actual emergency situation. 5. Ensure that information originating from the state accurately reflects the actual emergency situation.	• Serve as an interface between Xcel Energy and the states of Minnesota and Wisconsin. • Respond to state questions related to Xcel response activities.	Responsibilities aligned to actual performance responsibilities as demonstrated in drills and exercises.
43.	3.1.5 Emergency Planning County Liaisons	**Section B.1.a** County Liaison(s)	No Change. JIC Organization as defined in Section B-4 designates reporting chain to the Executive spokesperson.

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44.	The County Liaisons work with the State EP Liaison and assist that person by providing Liaison between NSPM/Xcel Energy and the County Agencies.	**Figure B-4, JIC Organization** **County Liaison(s)** • Provide assistance to County Emergency Operations Center (EOC) personnel. • Serve as an interface between County and Xcel Energy personnel. • Resolve rumors and validate site information regarding event status. • Coordinate response efforts with Sheriff's Offices. **Section C.3, p. 30** In addition to the coordination between the individuals in command and control of each organization, Xcel Energy personnel are dispatched to state or county EOCs as liaisons. The liaisons clarify information contained in emergency notifications and provide a communications link between the Xcel Energy and governmental emergency response facilities. When NRC representatives are present at the EOF and/or TSC, coordination occurs directly between NRC and Xcel Energy nuclear personnel.	Responsibilities aligned to actual performance responsibilities as demonstrated in drills and exercises.
45.	The County Liaison Representatives will have the following responsibilities: 1. Keep the State EP Liaison informed of issues brought up by County EOC staff and the media at County PIO briefings. 2. Provide assistance to the County EOC Operations Chief as requested. 3. Attend County press briefings as time permits. 4. Keep informed of activities in progress at the County EOC. 5. If requested by County EOC Operations Chief, contact State EP Liaison to resolve rumors and/or validate information concerning site status. 6. Assist Sheriff's Office representative in becoming aware of site shift change times, clearance of NSPM/Xcel Energy staff through roadblocks, or with other requests.		
46.	3.1.6 Security Advisor at the State Emergency Operations Center	**Section B.1.a** Security Advisor	
47.	The Security Advisor works with the Executive Spokesperson when security issues are concerns in the event. The individual assigned to fill this position will have the following responsibilities: 1. Provide the Executive Spokesperson with pertinent security information. 2. Act as NSPM/Xcel Energy's security liaison with the State of Minnesota.	**Figure B-4** **Section B.1.a** • Provide pertinent security information for security related events. • Serve as interface between Xcel Energy and State personnel.	Responsibilities aligned to actual performance responsibilities as demonstrated in drills and exercises. JIC Organization as defined in Section B-4 designates reporting chain to the Executive spokesperson.

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48.	**Section 4.0 Definitions**	**Section III: Appendices Appendix A**	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
49.	**4.1 Annually** Annually is defined as one calendar year (January – December).	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
50.	**4.2 Monthly** Monthly is defined as one month ± 1 week.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
51.	**4.3 Offsite Nuclear Emergency Plan** Provides supplementary direction and guidance for the NSPM/Xcel Energy Monticello and Prairie Island Emergency Response Organization including Site emergency plans and implementing procedures.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
52.	**4.4 Recovery Phase** The recovery phase should occur only after at least one fission product barrier is in place, the site is not making any radioactive releases to the environs greater than technical specification limits, and the site is stable, with very little potential for future degradation.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
53.	**4.5 Plant Management** The affected site's Vice President and their direct reports.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
54.	**4.6 Corporate Management** Those members of NSPM/Xcel Energy management below the Vice President level.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.

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55.	**4.7 Executive Management** Those members of NSPM/Xcel Energy management at the Vice President level and above.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
56.	**4.8 Corporate NSPM/XCEL ENERGY Offices** The administrative offices of NSPM/Xcel Energy located in Marquette Plaza, Minneapolis, Minnesota.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
57.	**4.9 Nuclear Emergency Preparedness Group** The NSPM/Xcel Energy group that is responsible for overall emergency preparedness including the interfacing with the governmental entities involved in emergency planning. Other NSPM/ Xcel Energy departments have emergency preparedness responsibilities as specified by this Plan or its Implementing Procedures.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
58.	**4.10 Communications Department** Xcel Energy communications staff are responsible for providing public information.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
59.	**4.11 Offsite Officials** Those elected or appointed officials responsible for Federal (e.g., NRC, FEMA), State, and local government functions.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.

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60.	**4.12 Emergency Director** The affected site's Plant Manager or his designee. This individual has responsibility for managing the onsite emergency organization and initial efforts external to the site until the near site EOF Emergency Response Organization is activated and the Emergency Manager assumes control.	**Section B.1.a** <u>Main Control Room (MCR)</u> Shift Manager/Emergency Director (SM/ED) • Provide overall ERO command and control until relieved. • Evaluate plant conditions and approve Emergency Action Level (EAL) classifications until relieved. • Approve Protective Action Recommendations (PARs) until relieved. • Authorize personnel dose extensions until relieved. • Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs until relieved. • Direct radiation protection activities, including Field Monitoring Team (FMT) direction until relieved. • Direct and approve notifications to state and county authorities until relieved <u>Technical Support Center (TSC)</u> Emergency Director • Approve EAL classifications • Approve notifications to state/local agencies • Approve Protective Action Recommendations (PARs) • Approve Personnel dose extensions • Approve issuance of KI	Specific ERO Position defined for responsibilities within the Standard Plan. The Emergency Director role is initially assumed by the Shift Manager until transitioned to the TSC ED as defined in the Standard Plan. Enclosure 1 Section B provides the detailed functional analysis for ERO staffing.

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61.	**4.13 Emergency Manager** The Emergency Manager has the authority and responsibility for the Management of NSPM/Xcel Energy response to an emergency. This individual will assume control at the Emergency Operations Facility (EOF) or Backup EOF and direct the NSPM/Xcel Energy response efforts.	**Section C.2.a** The individual authorized to request assistance and resources from responding organizations is the Emergency Manager who has overall authority for the Xcel Energy nuclear response. **Section A.1.c** The Emergency Manager in the EOF is responsible for overall event response upon activation of that facility.	Standard Plan defines the position within the EOF organization. Enclosure 1 Section B provides the detailed functional analysis for ERO staffing.
62.	**4.14 Recovery Manager** This person is responsible for the implementation of the Recovery Phase. This individual will perform tasks as directed by the Emergency Manager but will primarily be responsible for establishing the Recovery Organization and preparing for the long-term recovery effort.	**Section M.2** Recovery Manager • Overall management of recovery activities. • Interface with federal, state and county agencies during the recovery process	Standard Plan defines Recovery as a specific organization once criteria are met to enter recovery phase. Responsibility is not impacted by the Standard Plan.
63.	**4.15 Advisory / Technical Support Group** This group is made up of selected personnel. They will provide a pool of personnel who are familiar with NSPM/Xcel Energy's Monticello or Prairie Island facilities, Off-site procedures, and available resources.	**Figures B-1, B-2 and B-3**	Standard Plan figures define the functional Emergency Response Facility support organization.
64.	**4.16 Sister Site** The sister site is the unaffected NSPM/Xcel Energy nuclear site. The sister site to Monticello is Prairie Island, and the sister site to Prairie Island is Monticello.	No equivalent statement	Incorporation of the Standard Plan concept integrates the Emergency Plans of Monticello and Prairie Island eliminating the need for the Sister Site concept.

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65.	**4.17 Near-Site Emergency Operations Facility (EOF)** Once activated, the Near-site Emergency Operations Facility will serve as the affected Plant's base for control of offsite emergency response activities.	No near-site EOF is proposed in the Standard Plan.	The Standard Plan eliminates the Near-Site EOF for a consolidated EOF concept with a near site response facility for NRC Site Team. The consolidated EOF will be a remote facility located greater than 25 miles from either site. See Enclosure 4 for detailed justification of the concept.
66.	**4.18 Technical Support Center (TSC)** The onsite Technical Support Center provides a central area outside of the control room that functions as a command and control center for the coordinated onsite emergency response during emergency conditions.	**Section H.1** The TSC provides a location to house personnel who are responsible for management and technical support of plant operations during emergency conditions. The TSC also functions to relieve the on-shift personnel of peripheral duties and communications not directly related to reactor system manipulations and preventing congestion in the MCR.	No change in intent of the ERF. Language modified to align with NUREG-0654, Revision 2, updated terminology.
67.	**4.19 Operational Support Center (OSC)** The Operational Support Center will provide a center to assemble the necessary Operators, Radiation Protection Specialists, Instrument Control, Electrical, and Maintenance personnel to support the operations of the site under emergency condition without causing undue congestion in the Control Room.	**Section H.2** The OSC provides a location where plant maintenance, operations, radiation protection and other plant emergency support personnel will assemble and stand by to assist as needed.	No change in intent of the ERF. Language modified to align with NUREG-0654, Revision 2, updated terminology.
68.	**4.20 State Emergency Operations Centers (SEOC)** These are the command and control centers for the State(s) of Minnesota and Wisconsin. Situation, evaluations and coordinated protective action recommendations will be maintained between county EOCs, the state EOCs, and the site EOF.	No equivalent section	Section A of the Standard Plan provides the general description including State and County response. Facilities used are controlled by their respective Plans/Procedures and not germane to the Standard Plan.

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69.	**4.21 County Emergency Operations Centers (local EOCs)** These response centers provide command and control functions and are the central point of coordination for county and local emergency response organizations.	No equivalent section	Section A of the Standard Plan provides the general description including State and County response. Facilities used are controlled by their respective Plans/Procedures and not germane to the Standard Plan.
70.	**4.22 Monticello and Prairie Island's Off-Site EMERGENCY RESPONSE Organization**. Those individuals assigned duties and responsibilities located at the JIC, and County and State EOCs. This Organization is comprised of various NSPM/Xcel Energy personnel.	**Figure B-4**	The Standard Plan incorporates the offsite ERO into the SEP ERO with the same expectations as onsite personnel with respect to training and qualification. Figure B-4 now describes what was previously the Off-Site ERO.
71.	**4.23 Joint Information Center (JIC)** A facility where designated spokespersons from federal, state, local, tribal and NSPM/Xcel Energy personnel will issue media releases.	**Section G.2** The State of Minnesota maintains a combined JIC/EOC for use by Xcel Energy and the State of Wisconsin. The JIC/EOC has sufficient space to allow interaction with the media. The JIC is staffed at an Alert or higher classification by Xcel Energy Corporate Communications personnel to ensure coordination with affected agencies and provide public information to the media and the public. The JIC provides the necessary structure and mechanism for organizing, developing, integrating, and delivering coordinated interagency messages via established plans, procedures, and strategies.	No change in intent of the JIC or performance by responders was made by the standard plan. An expanded description was provided to better reflect the process used.

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72.	**4.24 Emergency Response Organization Notification Systems (ERONS)** An automated notification system that is used for ERO activation and augmentation. This system is initiated by the sites for a declared emergency and utilizes a variety of communication methods to contact the ERO.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a. Alternate methods of ERO notification are in place via individual callouts of personnel utilizing any of the various calling methods available.	The Standard Plan adopts a single methodology for the notification of all ERO members including those formally activated through the Corporate Plan.
73.	**Section 5.0 Requirements**		
74.	5.1 Concept of Operations		
75.	The emergency plans for the Monticello and Prairie Island fixed nuclear facilities are designed to be implemented independently of offsite support. However, it is the purpose of the Monticello and Prairie Island Offsite Nuclear Emergency Plan to augment the Onsite Emergency Response Organization with additional resources as soon as possible.	No equivalent statement	This Offsite Plan is being subsumed into the SEP – therefore there are no current references to the “Offsite Emergency Plan” in the SEP.
76.	The Monticello and Prairie Island Offsite Nuclear Emergency Plan is designed to be implemented in an incremental manner, as site needs dictate.	No equivalent statement	This Offsite Plan is being subsumed into the SEP – therefore there are no current references to the “Offsite Emergency Plan” in the SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
77.	For emergency conditions that are classified as Unusual Events, the response will be limited to supplying offsite assistance in the areas of public information (Xcel Energy's Communications Department) and liaison to state and local officials. During an "Alert", "Site Area Emergency", or "General Emergency" NSPM/Xcel Energy Monticello and Prairie Island Offsite Emergency Response Organization will be activated.	**Section G.2** Corporate Communications personnel may provide public information at the Unusual Event declaration using social media in accordance with Joint Information System (JIS) precepts. Interactions with the media may occur at various locations and with various agencies depending on the extent of the response.	The language was updated to reflect current company terminology. There is no change in intent or actual practice from the current Plan.
78.	This activation will be accomplished through use of the automated Emergency Response Organization Notification System (ERONS) which is initiated by the site.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a. Alternate methods of ERO notification are in place via individual callouts of personnel utilizing any of the various calling methods available.	The Standard Plan adopts a single methodology for the notification of all ERO members including those formally activated through the Corporate Plan.
79.	The individuals assigned to the Offsite Emergency Response Organization as well as their duties and responsibilities are identified in the Monticello and Prairie Island Offsite Nuclear Emergency Plan Implementing Procedures.	No equivalent statement	This Offsite Plan is being subsumed into the SEP – therefore there are no current references to the "Offsite Emergency Plan" in the SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
80.	The Monticello and Prairie Island Offsite Nuclear Emergency Plan coordinates the resources of several utility, NSPM/Xcel Energy departments and various outside agencies. These organizations have each developed emergency planning documents to support their respective functions in the event of a nuclear incident at Monticello or Prairie Island nuclear sites.	No equivalent statement	This Offsite Plan is being subsumed into the SEP – therefore there are no current references to the “Offsite Emergency Plan” in the SEP.
81.	The Monticello and Prairie Island Offsite Nuclear Emergency Plan is implemented depending on the severity and location of the incident, in conjunction with one or more of the following emergency plans: 1. Monticello Nuclear Generating Plant Emergency Plan. 2. Prairie Island Nuclear Generating Plant Emergency Plan. 3. State of Wisconsin Emergency Operations Plan (applicable for PI Site only)	No equivalent statement	This Offsite Plan is being subsumed into the SEP – therefore there are no current references to the “Offsite Emergency Plan” in the SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
82.	4. Pierce County Emergency Operations Plan (applicable for PI Site only). 5. State of Minnesota Emergency Operations Plan. 6. State of Minnesota Local Government Emergency Response Plans for Nuclear Generating Plants. • City of Red Wing/Goodhue County Emergency Response Plan for the Prairie Island Nuclear Generating Plant. • Dakota County Emergency Response Plan for an Incident at the Prairie Island Nuclear Generating Plant. • Wright County Emergency Response Plan for the Monticello Nuclear Generating Plant. • Sherburne County Emergency Response Plan for the Monticello Nuclear Generating Plant. 7. Prairie Island Indian Community (applicable for PI Site only).	No equivalent statement	This Offsite Plan is being subsumed into the SEP – therefore there are no current references to the “Offsite Emergency Plan” in the SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
83.	Additionally, "Letters of Agreement" have been obtained from various other offsite agencies and corporations. These letters specify pre-existing arrangements to support NSPM/Xcel Energy or state and local government actions during an emergency condition. A list of these letters is provided in Attachment 5 of this Plan.	**Section C.2** Memorandums of Understanding (MOUs) and/or LOAs have been developed between Xcel Energy and several entities to provide emergency response support and services consistent with this plan. MOUs and LOAs are referenced by organization and title in element A.4 of the site-specific annexes. A contract/purchase order with a private contractor is considered acceptable in lieu of a MOU or LOA for the specified duration of the contract. LOAs common to both sites include; • Institute of Nuclear Power Operations (INPO) • State of Minnesota, Department of Public Safety Division of Homeland Security and Emergency • Regions Hospital • Environmental Inc, Midwest Laboratory • Department of Energy – REAC/TS • North Memorial Health Care • Pooled Equipment Inventory Co (PEICo)	The SEP updates language. There is no change in intent. There is no change in the proposed Plan for organizations in which an MOU/LOA was maintained. Site Specific information is contained in the applicable Change Justification Matrix.
84.	5.2 Emergency Classification System	**Section D, p. 33**	
85.	At the Monticello and Prairie Island Nuclear Generating facilities, emergencies are classified into one of four categories. Each succeeding category increases in level of severity and requires an increased amount of participation by onsite and offsite personnel.	**Section D.1** Xcel Energy has established and maintains a standard emergency classification and emergency action level scheme. The four ECLs are described as follows:	The SEP updates language. There is no change in intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
86.	For each emergency category, key personnel within NSPM/Xcel, Federal, State, Tribal and local organizations will be notified. They will, in turn, activate their respective emergency organizations according to their individual plans based on the conditions of the emergency.	**Section E.1** Xcel Energy, in coordination with state and county authorities, has developed methods and procedures for notification of offsite response organizations consistent with the emergency classification and EAL scheme.	The SEP updates language. There is no change in intent.
87.	Each classification provides a known boundary concerning the severity of the emergency condition.	**Section D.1** Xcel Energy has established and maintains a standard emergency classification and emergency action level scheme. The four ECLs are described as follows:	The SEP updates language. There is no change in intent.
88.	All NSPM/Xcel, Federal, State and local organizations accept this classification system and recognize the bounds of severity of the categories.	**Section D.1.b** The emergency classification and EAL scheme has been agreed upon by state and county governmental authorities that support Xcel Energy sites. Changes to the classification scheme or site-specific EALs are reviewed with the sites' respective state and county EPZ governmental authorities in advance of implementation.	The SEP updates language. There is no change in intent.
89.		**Section D.2** Xcel Energy has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded. The 15-minute time requirement to declare events will not be construed as a grace period to attempt to restore conditions to avoid declarations.	This section was previously in Site E Plans. The change reflects wording contained in the November 2011 Enhanced EP Rulemaking.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
90.	Associated with this classification system are recommended guidelines for protective actions to be implemented by State and local offsite authorities.	**Section E.3** In conjunction with state and county authorities, Xcel Energy nuclear sites have established the content of the initial notification message to be used during an emergency. Initial notification will include the following: • Site Name • ECL • Release status • PAR, if applicable The content of the follow-up messages is detailed in procedures.	Formatting of NUREG-0654, Revision 2, provides direction for PARs in Notification Section (E) vice Classification Section (D). The SEP contains criteria to provide a Protective Action Recommendation for any General Emergency Classification.
91.	Various events could initially be classified in one category and later be reclassified, as better defined and more complete information becomes available. The emergency classification system is constructed to provide a smooth transition between categories.	**Section D.1.a** EALs at Xcel Energy nuclear sites have been developed in accordance with NEI 99-01, Revision 6, Development of Emergency Action Levels for Non-Passive Reactors. This guidance has been approved by the NRC and is applicable to the reactor design at Xcel Energy nuclear sites.	The language has been reflected to address the use of the NEI 99-01 EAL scheme.
92.	The mechanism to classify any single event or group of events or conditions into one of the above categories is contained in the respective Site Emergency Plan Implementing Procedures.	**Section D.3** Xcel Energy maintains procedures that include immediate actions to be taken that are consistent with any declared EAL.	The language has been updated to reflect usage of the NEI 99-01 EALs. There is no change in intent.
93.	In general, the individual who is functioning as the Emergency Director is responsible to classify all emergency conditions.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Evaluate plant conditions and approve Emergency Action Level (EAL) classifications until relieved. <u>Technical Support Center (TSC)</u> Emergency Director (ED) • Approve EAL classifications	The SEP provides key responsibilities in bullet form. There is no change in the responsibility of the ED for Classification.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
94.	In certain situations, it is possible that the offsite organization may have data which would confirm an emergency classification or precipitate a reclassification. In order to preclude erroneous reclassification, after the EOF Emergency Response Organization is fully activated and has assumed responsibility for offsite activities, all changes in classification must have the concurrence of the Emergency Manager.	No equivalent statement	The SEP integrates offsite organization and the onsite into a single ERO making the statement not applicable under proposed change – See Table in B.2.a, page 20.
95.	Monticello and Prairie Island Nuclear Generating Plant Emergency Plan Implementing Procedures contain specific parameter values and equipment status for each emergency class as a convenient cross reference.	**Site-Specific Emergency Action level (EAL) and Technical Basis Document (EP-PLAN-04, EP-PLAN-05)**	The SEP incorporates each site's EALs and respective technical bases into stand-alone documents. These documents were previously approved by the NRC by separate SER.
96.	5.2.1 Classification System		
97.	Emergency situations are classified according to severity, taking into consideration potential as well as actual events in process.	**Section D.1.a** EALs at Xcel Energy nuclear sites have been developed in accordance with NEI 99-01, Revision 6, Development of Emergency Action Levels for Non-Passive Reactors. This guidance has been approved by the NRC and is applicable to the reactor design at Xcel Energy nuclear sites.	Language updated to reflect specific approval of NEI 99-01, Revision 6 EALs at both Xcel sites by previous submittal.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
98.	The four classifications are as follows: 1. Notification of Unusual Event (Unusual Event) 2. Alert	**Section D.1** The four ECLs are described as follows: <u>Unusual Event (UE)</u> Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs. <u>Alert</u> Events are in progress, or have occurred, which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life-threatening risk to site personnel or damage to site equipment because of hostile action. Any releases are expected to be small fractions of the EPA Protective Action Guideline exposure levels.	The SEP provides a formatting Change to Reflect current definitions of the four EAL Classification Levels with the listing rather than located elsewhere in the Plan.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
99.	3. Site Area Emergency 4. General Emergency	Site Area Emergency (SAE) Events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or hostile action that results in intentional damage or malicious acts; 1) toward site personnel or equipment that could lead to the likely failure of or; 2) that prevent effective access to, equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA PAG exposure levels beyond the site boundary. General Emergency (GE) Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or hostile actions that result in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA PAG exposure levels offsite for more than the immediate site area.	The SEP provides a formatting Change to Reflect current definitions of the four EAL Classification Levels with the listing rather than located elsewhere in the Plan.
100.	Methodologies for Classification of Emergencies are found in the Site Emergency Plans.	**Background** **Site-Specific Emergency Action level (EAL) Technical Basis Document (EPLAN-04, -EPLAN-05)**	The EAL Schemes and associated bases documents are now provided as stand-alone plan documents. The system is based on NEI 99-01, Revision 6 which was submitted and approved by a previous LAR.
101.	5.3 Facilities and Equipment	**Section H, p. 45**	
102.	5.3.1 Description of NSPM/Xcel Energy's Offsite Facilities		
103.		**Section C.1** The Xcel Energy EOF contains dedicated work areas and resources for federal personnel.	Statement added to clarify expectation to provide support for responding federal personnel.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
104.	1. Backup Emergency Operations Facility (BUEOF) This facility is approximately 1400 sq. ft. in area and is located in conjunction with Xcel Energy's general offices in Minneapolis. The primary purpose of this facility is to serve as the Backup EOF in the event that the near site EOF becomes uninhabitable, or security issues exist.	No equivalent statement	The SEP proposes a consolidated EOF located in downtown Minneapolis, formerly the Backup EOF, in place of near-site EOFs and the current approved BUEOF. Enclosure 4 provides the detailed justification for NRC approval of a consolidated EOF beyond 25 miles from the respective sites.
105.	2. Near-site Emergency Operations Facility (EOF) The Emergency Operations Facility is activated during "Alert", "Site Area Emergency" and "General Emergency" conditions. The purpose of the EOF is to provide a command and control center for the utilities offsite emergency activities concerned with identifying and limiting the consequences of the emergency conditions.	No equivalent statement	The SEP proposes a consolidated EOF located in downtown Minneapolis, formerly the Backup EOF, in place of near-site EOFs and the current approved BUEOF. Enclosure 4 provides the detailed justification for NRC approval of a consolidated EOF beyond 25 miles from the respective sites.
106.	The EOF is located in the Plant Training Center which also contains administrative offices for the Training Department and the plant simulator. For Monticello, the EOF is located approximately 1 mile south-southeast of the plant within the city of Monticello. For Prairie Island, the EOF is located approximately 1/2 mile west of the plant.	No equivalent statement	The SEP proposes a consolidated EOF located in downtown Minneapolis, formerly the Backup EOF, in place of near-site EOFs and the current approved BUEOF. Enclosure 4 provides the detailed justification for NRC approval of a consolidated EOF beyond 25 miles from the respective sites.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
107.	A more detailed description of the EOF facilities are contained in the Monticello and Prairie Island Nuclear Generating Plant Emergency Plans.	No equivalent statement	The SEP proposes a consolidated EOF located in downtown Minneapolis, formerly the Backup EOF, in place of near-site EOFs and the current approved BUEOF. Enclosure 4 provides the detailed justification for NRC approval of a consolidated EOF beyond 25 miles from the respective sites.
108.		**Section H.3** The EOF is a dedicated facility located in conjunction with Xcel Energy's general offices in Minneapolis and serves as the EOF for Xcel Energy nuclear sites. Access to the EOF is controlled using electronic card readers. The EOF is required to be activated within 90 minutes following the declaration of an Alert or higher classification. The EOF has the capability to display vital plant data and radiological information for each site and unit, in near real time, to be used by knowledgeable individuals responsible for providing technical briefings on plant conditions, event prognosis, and for management of overall emergency response. The EOF provides reliable voice communications to each site's MCR, TSC, OSC, the NRC, and state and county warning points and EOCs.	Section provides updated description for proposed consolidated EOF. Enclosure 4 provides the detailed justification for NRC approval of a consolidated EOF beyond 25 miles from the respective sites.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
109.		**Section H.3.a** The EOF is greater than 25 miles from MNGP and PINGP. Xcel Energy maintains space for members of an NRC Site Team and federal responders at a location near those sites. The location and provisions of the near-site facilities is described in the site-specific annexes.	The SEP proposes a consolidated EOF located in downtown Minneapolis, formerly the Backup EOF, in place of near-site EOFs and the current approved BUEOF. Section was added to document NRC requirement to provide near-site space for federal responders if the primary EOF is located greater than 25 miles from the site(s). Enclosure 4 provides the detailed justification for NRC approval of a consolidated EOF beyond 25 miles from the respective sites.
110.	5.3.2 On-Site Emergency Centers		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
111.	There are two emergency centers at each plant, the onsite Technical Support Center	**Section H.1** Each Xcel Energy nuclear site has a dedicated TSC for use during emergency situations to implement emergency actions and analyze and mitigate accident conditions. The TSCs are sized to accommodate ERO responders and NRC representatives. State and county personnel are not expected to report to the TSC. The TSC is activated within 60 minutes following the declaration of an Alert or higher classification. TSC activation at the Unusual Event emergency classification level is optional. Site-specific details of the TSC are described in the site-specific annexes. **Monticello Annex, Section H.1** The Technical Support Center (TSC) is located on the first level of the Plant Engineering Building (PEB). **Prairie Island Annex, Section H.1** The Technical Support Center (TSC) is located across the Turbine Building from Units 1 & 2 Control Room.	Expanded description of the TSC and the OSC (see line 111) below to align with formatting per NUREG-0654, Revision 2. Activation times are specified. The SEP provides no change to the existing TSC or OSC.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
112.	…and the onsite Operational Support Center.	**Section H.2** Each Xcel Energy nuclear site has an OSC that provides an area for coordinating and planning event response activities and for staging personnel and equipment. The OSC is activated within 60 minutes following the declaration of an Alert or higher classification. OSC activation at the Unusual Event emergency classification level is optional. Site-specific details of the OSC are described in the site-specific annexes. **Monticello Annex, Section H.2** The Operational Support Center (OSC) is located in designated areas on the first and second levels of the Plant Administration Building and is provided with the necessary equipment and communication links to support OSC emergency response actions. **Prairie island Annex, Section H.2** The Operational Support Center (OSC) is located in the New Administration Building and is provided with the necessary equipment and communications links to support OSC emergency response actions	Expanded description of the TSC and the OSC below to align with formatting per NUREG-0654, Revision 2. Activation times are specified. The SEP provides no change to the existing TSC or OSC.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
113.	Alternative Response Facilities have been designated when ERO response to the onsite centers is not appropriate due to the nature of the site event.	**Section H.4** An Alternative Emergency Facility for staging of ERO personnel has been designated for each Xcel Energy nuclear site and serves as a location for TSC and OSC personnel should those facilities become uninhabitable or in the cases where the facilities cannot be accessed such as a hostile action or natural disaster. The location of the Alternative Emergency Facility for each site is provided in the site-specific annexes.	Language has been updated in the SEP to maintain the commitment for Alternative Response Facilities consistent with the November 2011 Enhanced EP Rulemaking and direct the reviewer to the Site Annex for the site-specific facility information.
114.	Detailed descriptions of these centers are included in the specific site plans.	**Monticello Annex, Section H.4** The MNGP Training Building has been designated as the MNGP alternative facility. **Prairie island Annex, Section H.4** The Red Wing Service Center (RWSC) has been designated as the Alternative Facility.	Language has been updated in the SEP to maintain the commitment for Alternative Response Facilities consistent with the November 2011 Enhanced EP Rulemaking and direct the reviewer to the Site Annex for the site-specific facility information.
115.	5.3.3 Governmental Facilities		
116.	1. Minnesota State Emergency Operations Center (EOC) The State EOC is the command and control center for the state. Coordination will be maintained between County EOCs and the State EOC for situation evaluation and protective actions. Federal agencies assigned responsibilities in the event of a nuclear power plant accident, regardless of location, will maintain coordination with the State EOC	**Section A.1.a** The Minnesota (MN) Department of Public Safety has the responsibility for notification and coordination MN of state agencies in the event of a major emergency at Monticello and Prairie Island. When the State Emergency Operations Center (SEOC) is activated, communications between departments are initiated in order to coordinate procedure implementation. The state agencies responsible for implementing procedures have established a system of 24-hour communications.	Language updated to reflect current State/County Emergency Plan language. There is no change in intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
117.	State agencies assigned responsibilities for emergency functions will provide required personnel at the State EOC. In most instances, when the state EOC is activated a licensee Executive Spokesperson will be in attendance. The Executive Spokesperson will have an office at the EOC equipped with communication channels (voice & telecopy) to interface with key licensee facilities including the EOF.	No equivalent statement	The description is no longer applicable to licensee Emergency Plans per NUREG-0654, Revision 2.
118.	2. Wisconsin State Emergency Operations Center (EOC) For emergencies at Prairie Island, the Wisconsin EOC in Madison will be activated and will serve as a command and control center for Wisconsin response activities. The Wisconsin EOC in Madison will coordinate communications with the Pierce County (Wisconsin) EOC in Ellsworth and the Joint Information Center (JIC) in St. Paul, Minnesota.	No equivalent statement	The description is no longer applicable to licensee Emergency Plans per NUREG-0654, Revision 2.
119.	3. County Emergency Operations Centers (EOC) The county EOCs are command and control centers for the local emergency response organizations. They are located in the following buildings:	**Section A.1.a** Counties within the sites' plume exposure EPZ maintain emergency plans that address the following primary response aspects: • Notification of their own personnel and other agencies such as, local law enforcement, fire and rescue, and Red Cross. • Traffic control • Notification or warning of persons in affected areas.	Language of the SEP has been updated to more clearly state responsibilities of the offsite counties. Specifics to the EOCs are deleted due to the facility description being maintained in the offsite approved plans. The list of impacted counties is maintained unchanged.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
120.	• Goodhue County Law Enforcement Building. • Dakota County Government Center. • Pierce County Emergency Management Office in the Ellsworth Courthouse Annex. • Wright County Courthouse. • Sherburne County Government Building.	**Section A.1.a (continued)** • Evacuation out of the affected area, and provisions for shelter, food, accommodations, communications, medical care, etc. • Provide support to other counties, Xcel Energy, state and federal agencies. Select counties adjacent to the sites' plume exposure EPZ maintain emergency plans to provide assistance and logistics support if evacuation of portions of the ten-mile EPZ becomes necessary. Plume exposure and ingestion pathway EPZ counties are listed in the site-specific annexes. Emergency Planning Zone (EPZ) Counties The Emergency Management Agencies representing the Minnesota counties of Sherburne, Wright, Dakota, and Goodhue and the Wisconsin County of Pierce have the responsibility for notification and providing direction to residents in the event of an emergency that affects their respective jurisdiction.	Language of the SEP has been updated to more clearly state responsibilities of the offsite counties. Specifics to the EOCs are deleted due to the facility description being maintained in the offsite approved plans. The list of impacted counties is maintained unchanged.
121.	The County EOC receives primary direction from the State EOC and coordinates the local emergency response activities. The agencies assigned responsibilities in the county emergency response organization will provide the required personnel to the county EOCs.	**Section A.1.a, (continued)** The 24-hour notification points have the responsibility to notify necessary local civil support groups in the event of an accident. The County is responsible for protection of the public and can provide personnel and equipment for evacuation, relocation, and isolation.	The description is no longer applicable to licensee Emergency Plans per NUREG-0654, Revision 2.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
122.	4. Joint Information Center (JIC) The State of Minnesota has established a JIC, which will be activated jointly with the State EOC. The JIC is located in the Saint Paul Minneapolis area and the major Minnesota news media are also headquartered in this area. The State of Wisconsin officials are aware of this arrangement and are prepared to send representatives.	**Section G.2** The State of Minnesota maintains a combined JIC/EOC for use by Xcel Energy and the State of Wisconsin. The JIC/EOC has sufficient space to allow interaction with the media. The JIC is staffed at an Alert or higher classification by Xcel Energy Corporate Communications personnel to ensure coordination with affected agencies and provide public information to the media and the public. The JIC provides the necessary structure and mechanism for organizing, developing, integrating, and delivering coordinated interagency messages via established plans, procedures, and strategies.	The SEP provides updated language more specific to the JIC organization and function. There is no change proposed to the facility or current functionality as demonstrated in drills/exercises.
123.	5.3.4 Communication Links	**Section F – Emergency Communications**	
124.	The equipment in each site Emergency Response Facility is specified in their Emergency Plans. The equipment in the Backup EOF is described in Attachment 2.	**Section F Emergency Communications** **PI Annex Table F.1.b PINGP Communications Matrix** **Monticello Annex Table F.1.b MNGP Communications Matrix**	The SEP provides standardized Section F provides description of the communications systems available to the entire organization. The site-specific tables provide an integrated listing of what's available to the site. Methods and interfaces are described in Enclosures 2 and 3 Attachment 5 to this submittal to clarify site communication capabilities and interfaces. No change in actual communications capability is proposed in the SEP.
125.	5.4 Emergency Response		
126.	Emergency response activities performed through the Monticello and Prairie Island Offsite Emergency Response Organization are predicated on the fact that each site is able to operate independently for several hours during an emergency.	No equivalent statement	Incorporation of a consolidated SEP eliminates the need for ongoing independent operation.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
127.	Since the Offsite Emergency Response Organization can be activated within approximately 2 hours, adequate support is available, should the site require it.	No equivalent statement Figures B-3 EOF and B-4 JIC document the staffing timeliness requirements for key personnel.	Incorporation of a consolidated SEP eliminates the need for ongoing independent operation. Activation timing for the EOF/JIC is now formalized in the SEP at 60/90 minutes for the EOF and 90 minutes for the JIC.
128.	5.4.1 Activation		
129.	Activation/Site The Shift Manager/Emergency Director is responsible for activating the site Emergency Response Organization in accordance with site Emergency Plan Implementing Procedures. A detailed description of the site activation process is contained in the applicable Site Emergency Plan.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	A single methodology for activation of the ERO responding to a specific event was adopted covering both site and previous corporate organizations.
130.	Activation/Offsite The NSPM/Xcel Energy Monticello and Prairie Island Offsite Emergency Response Organization can be activated within about 2 hours of notification. The Site Plan Implementing Procedures provide for the notification of the Offsite Emergency Response Organization (ERO). The automated Emergency Response Organization Notification System (ERONS) will notify the Offsite ERO in the event of a declared emergency in accordance with the Offsite Emergency Plan Implementing Procedure.	No equivalent statement	The incorporation of the consolidated EOF into the SEP provides for 60/90 minute staffing and activation. Similarly, the SEP provides for 90-minute staffing of the JIC.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
131.	5.4.2 Planned Response Action	**Section A.1** A description of the Xcel Energy Emergency Response Organization (ERO) is detailed in Section B. The subsections below identify the Offsite Response Organizations (OROs), federal, state, tribal, county and other organizations that encompass the overall response organization for an event at an Xcel Energy plant site.	SEP added the introductory paragraph to enhance readability of the section.
132.	1. Response/Site The Site Emergency Response Organization is activated immediately after the Shift Manager declares an emergency condition as described in site plans. At this declaration, the Shift Manager becomes the Emergency Director until he is formally relieved of that responsibility according to the site Emergency Plan Implementing Procedures.	**Section D.3, Table D.3-1** **Section B.2** The SM/ED is the on-shift individual who has the authority and responsibility to immediately and unilaterally initiate any emergency actions, including providing PARs to authorities responsible for implementing offsite emergency measures.	The SEP updates language without changing practice or intent.
133.	As Emergency Director, several emergency response actions are pre planned in the site plan and procedures. These actions include steps that initiate the activation process for the site Emergency Response Organization.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	A single methodology for activation of the ERO responding to a specific event was adopted covering both site and previous corporate organizations.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
134.	2. Response/ Monticello and Prairie Island Offsite The Xcel Energy Security Operations Center (SOC) is continuously manned at Xcel Energy's General Office. When notified of an emergency condition, the SOC will initiate a Mission Mode notification to establish a management conference call. As part of the site's ERONS, offsite ERO are also notified who will respond to their assigned ERF and initiate Offsite Emergency Plan Implementing Procedures. The notified personnel have assigned duties that, when implemented, provide for an operational group of personnel at the JIC.	No equivalent statement	NUREG 0654, Revision 2, separates the functions controlled by other site plans from the Emergency Plan as defined by the EP functions. Security performance is controlled by the site Security Plan and therefore no longer addressed in the SEP.
135.	3. Response/Vendor/Consultant There are two primary vendors that are involved with emergency response planning for Monticello and Prairie Island Sites. They are: General Electric Co. (GE) for Monticello and Westinghouse (W) for Prairie Island.	**Section B.5** Major equipment providers or Architect-Engineers include Westinghouse Electric Corporation and General Electric Corporation, which can provide the following assistance in an emergency:	SEP language was consolidated without change in practice or intent.
136.	At the request of the Emergency Manager, these companies will provide assistance. The response actions which may be requested involve the following:		The site annexes contain the LOAs for the respective Vendors. There is no change to Westinghouse/GE support connected to the SEP proposal.
137.	• Personnel • Technical analysis • Operational analysis • Accident/transient analysis Other vendors or consultants will be requested to provide assistance as needed.	**Section B.5** • Trained personnel. • Technical analysis. • Operational analysis. • Accident and transient analysis.	The site annexes contain the LOAs for the respective Vendors. There is no change to Westinghouse/GE support connected to the SEP proposal.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
138.	4. Assistance from Other Utilities Under an emergency, it may be desirable to call on the resources (personnel and equipment) of other nuclear utilities, outside of NSPM/Xcel Energy. Such a request may be made by the sites using the INPO Emergency Resource Manual.	**Section C.2** LOAs common to both sites include; • Institute of Nuclear Power Operations (INPO)	The INPO agreement provides the industry cooperative support. SEP language was updated to align with current practice. There was no change in LOAs/MOUs maintained.
139.	5. Response/Support and Resources The Minnesota Department of Homeland Security and Emergency Management (HSEM) and the Wisconsin Emergency Management (WEM) are the state agencies which are responsible for the overall direction of the state emergency response efforts.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
140.	The HSEM and WEM will activate their Emergency Operation Centers and deploy their personnel and resources, in accordance with the State of Minnesota Emergency Operations Plan, and the Wisconsin Emergency Operations Plan respectively.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
141.	These plans include written messages intended for the public which are consistent with the emergency classification scheme and give the public instruction regarding suitable protective action.	**Section E.5** State and county procedures provide for initial and follow-up messages to the public including instructions for protective actions, if required. Xcel Energy assists with establishment of appropriate instructions and message content.	The SEP provides for general assignment of responsibility. Message content is provided by the respective OROs.
142.	The Public Emergency Planning Education Program (described in Section 5.5) will familiarize the public in the proper response to these pre-planned messages.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
143.	The Federal Department of Energy Radiological Assistance Program is available for monitoring assistance and radiological advice to the Minnesota Department of Health (MDH), Section of Radiation Control, and the Wisconsin Department of Health Services (DHS), section of Radiation Protection.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
144.	The Department of Energy (DOE) is the coordinating agency for the Federal Emergency Response Plan (FERP). Regional Coordinating offices are assigned geographic responsibilities for incidents in their region. Their objective is to rapidly dispatch specialists to the incident site, evaluate the hazard, take recommended action to counteract and control any acute hazard, and establish communications with local authorities and the press.	**Section A.1.a** <u>Department of Energy (DOE)/Radiation Emergency Assistance Center/Training Site (REAC/TS) Support</u> The DOE provides radiological assistance on request though the REAC/TS and has radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. Following a radiological incident, DOE operates as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP).	SEP provides updated language without changing practice or intent.
145.	The Regional Coordinating Offices will respond to requests for radiological assistance from the NSPM/Xcel Energy, federal, state, and local agencies, and would implement the FERP.		SEP provides updated language without changing practice or intent.
146.	The Emergency Manager will, if necessary, coordinate with the Health Department(s) any request for DOE assistance. Federal assistance teams will be supplied operating quarters, support, and resources by the State EOC(s).		The statement is no longer addressed in the SEP. Activation of DOE assistance is controlled by the FRMAP.
147.	5.5 Public Information		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
148.	Public Emergency Planning Education NSPM/Xcel Energy, in coordination with state, county and local officials, annually provides the general public (including transients) with information concerning the methods of public notification and what individual actions should be taken during an emergency.	**Section G.1** Xcel Energy, in coordination with state, county and local officials, annually provides the general public, including transients, with information concerning the methods of public notification and what individual actions should be taken during an emergency.	The SEP provides updated language without changing requirement, practice or intent.
149.	This information may include: • methods of public notification • possible protective actions • general information as to the nature and effects of radiation • contact points for additional information • special needs for the handicapped • registration cards for the mobility impaired.	**Section G.1** This information may include: • methods of public notification • possible protective actions • general information as to the nature and effects of radiation • contact points for additional information • special needs for the handicapped • registration cards for the mobility impaired.	The SEP provides updated language without changing requirement, practice or intent.
150.	Methods for disseminating the information may include calendars, brochures, annual publications, public postings and/or meetings. Dissemination of information to the public is coordinated with state and local agencies.	**Section G.1** Methods for disseminating information may include brochures, annual publications, public postings, websites and/or meetings and lake access signs. Transient locations may include, but are not limited to, motels, hotels, marinas, and lake access areas. Dissemination of information to the public is coordinated with state and local agencies.	The SEP provides updated language without changing requirement, practice or intent.
151.	Media Information The Xcel Energy Communications Department has established a Nuclear Emergency Communications Plan. This program is designed to ensure prompt communications between Xcel Energy or NSPM and principal media organizations.	**Section G.5** The Xcel Energy Communications Department has communications procedures to ensure prompt communications between Xcel Energy and principal media organizations.	The SEP provides updated language without changing requirement, practice or intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
152.	At least once a year, both states will conduct training programs or send mailings to acquaint the news media with the emergency plans and to provide information concerning radiation and points of contact for release of public information in an emergency. NSPM/Xcel Energy has input to this process.	**Section G.5** At least once a year, both states will conduct training programs or send mailings to acquaint the news media with the emergency plans and to provide information concerning radiation and points of contact for release of public information in an emergency. Xcel Energy has input to this process.	No change
153.	NSPM/Xcel Energy have established procedures for informing the news media when a nuclear power plant is removed from service and the Nuclear Emergency Communications Plan delineates additional responsibilities during a serious nuclear accident.	No equivalent statement	Prior Plan statement was outside the controls of the Emergency Plan.
154.	Primary responsibility for implementation of the program rests with the Xcel Energy Communications Department after notification by the site.	No equivalent statement	Incorporation of the JIC into the SEP provides formal commitment as to the process and controls.
155.	Release of information to the news media and the scheduling of news conferences SHALL have the review and concurrence of the Executive Spokesperson.	No equivalent statement	The statement provides procedure level detail. The joint control of the JIC by site and offsite personnel provide controls for release of information.
156.	NSPM/Xcel Energy and Xcel Energy Employee Information It is desirable that NSPM/Xcel Energy employees be aware of the current status during an emergency. This ensures employees do not inadvertently start rumors.	No equivalent statement	The SEP addresses notification of personnel supporting implementation of the emergency plan and provides for protective actions for non-essential personnel onsite. Communications to uninvolved employees are beyond the scope of the plan and federal regulatory requirements and controlled at the procedural level.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
157.	Methods of employee communication are delineated in the Communications Program and may consist of the following: • Electronic mail • Public address announcements • Daily news services, print, and phone • Employee meetings	No equivalent statement	The SEP addresses notification of personnel supporting implementation of the emergency plan and provides for protective actions for non-essential personnel onsite. Communications to uninvolved employees are beyond the scope of the plan and federal regulatory requirements and controlled at the procedural level.
158.	5.6 Emergency Organization Interfaces		
159.	The purpose of this section is to specify communications interfaces between the Emergency Response Organization and various organizational entities within and outside of NSPM/Xcel Energy.	**Section B, Figure B.4-1** A block diagram showing the interfaces between the licensee and state, local, tribal government organizations is located in Figure B.4-1.	The block diagram outlining the interfaces was adopted as a recommendation of NUREG-0654, Revision 2. The SEP proposes no change to current practices.
160.	After notification of an emergency condition is made to offsite officials, the state, and applicable county emergency operations centers, the associated response teams will be activated, in accordance with the appropriate State Emergency Plans.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
161.	Designated NSPM/Xcel Energy personnel will make periodic status reports of site conditions to offsite officials.	**Section E.1.a** Follow-up messages are provided periodically to the appropriate offsite authorities. For long duration events with little change in information between messages, the follow-up message time interval can be increased as agreed upon by affected agencies. Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	The SEP provides updated language without any change to performance or intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
162.	Meteorological data, survey results, projected doses and protective action recommendations will be provided to offsite officials.	**Section I.6** Xcel Energy uses an industry recognized dose assessment code to make timely assessments of the actual or potential magnitude and locations of any radiological hazards through gaseous release pathways. Personnel qualified in dose assessment are available on-shift, in the TSC and the EOF. Dose assessment results and field monitoring readings assist in evaluating appropriate ECLs based on radiological EALs and developing any related PARs. The immediate onsite magnitude and consequences of liquid releases regarding event classification are primarily determined by liquid effluent monitors and direct area surveys. Post-plume protective actions are developed by OROs and described in state and county radiological emergency plans. Xcel Energy FMT and laboratory personnel may assist ORO decision making with sample collection and analysis using established procedures and protocols	SEP provides a more detailed description of the capability and intent to share related information with OROs. There is no proposed change in practice or intent.
163.	The final decision concerning what protective actions will be implemented on behalf of the public rests with the Governor of each State.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
164.	Designated Utility officials will make recommendations (see site plans) but the State of Minnesota (and/or Wisconsin & Prairie Island Indian Community) is responsible for issuing protective actions decisions (PADs). If necessary, for a fast developing incident, the States' Plan provides for the contingency that the site may recommend immediate protective actions to offsite officials.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.

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165.	5.7 Recovery Phase	**Section M**	
166.	The process of Recovery Phase is defined in the specific site plans.	**Section M.2 and Figure M.2-1** Figure M-2 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization.	The SEP consolidates the language related to Recovery from the existing corporate and site Plans. See the Site Plan Justification Matrices for detailed alignment of the Recovery process proposed in the SEP.
167.	5.8 Exercises, Drills and Training	**Section N**	
168.	Exercises Periodic exercises and drills are conducted to evaluate major portions of emergency response capabilities, maintain capabilities and identify deficiencies that form the basis for corrective action.	**Section N.1** An exercise tests the integrated capability and a major portion of the elements of the emergency plan and organizations. Over the period of the exercise cycle, exercises will 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. Drills are supervised instructional periods aimed at testing, developing and maintaining skills in a particular operation and are a part of the continuous training program and is often a component of an exercise. Drills and Exercises may be comprised of combinations of the criteria described below.	Language for the SEP was consolidated from the existing Site Emergency Plans and Corporate Emergency Plan. Resulting language is consistent with the 2011 Enhanced EP Rulemaking. Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
169.	These exercises serve to develop and maintain key skills in the course of emergency response.	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
170.	An exercise is a real time simulated event that tests the integrated capability of the ERO and a major portion of the five basic elements existing within emergency preparedness plans.	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
171.	The emergency preparedness exercise simulates an emergency that results in potential offsite radiological releases which would require response by offsite authorities.	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
172.	The five basic elements are: 1. Initial Response Activities • Identify and classify emergency • Notify and communicate conditions • Activate organizations and facilities • Control facility access	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
173.	2. Emergency Response Activities • Assess accidents • Mitigate accidents • Recommend protective actions	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
174.	3. Radiological Response Activities • Sample/analyze plant air/liquids • Monitor onsite radiological conditions • Control emergency radiation exposure • Monitor offsite radiological conditions	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
175.	4. Assembly and Accountability Activities	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
176.	5. Offsite Interface Activities	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
177.	The specifics of conducting Emergency Preparedness drills or exercises are found in Emergency Preparedness Drill and Exercise Manual.	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
178.	When integrated exercises are conducted, the scope will be expanded to also include appropriate State and local government agencies as well as the JIC.	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
179.	Each site SHALL exercise with offsite authorities such that the State and local government emergency plans for each operating reactor site are exercised at least biennially, with full or partial participation by State(s) and local governments, within the plume exposure pathway EPZ.	**Section N.2, N.2.a** Each Xcel Energy nuclear site will conduct a Plume Exposure Pathway (PEP) Exercise biennially. This exercise includes mobilization of licensee state, local, and tribal government personnel, as applicable, and resources and implementation of emergency plans to demonstrate response capabilities. State, county and tribal authorities are invited to participate in PEP exercises. If a state, county or tribal organization chooses not to participate it will be documented that they were given the opportunity to participate. Exercise scenarios are submitted in accordance with 10 CFR 50, Appendix E, IV.F(2)b.	Language updated to reflect the 2011 Enhanced EP Rulemaking. The SEP provides to no change to practice or intent.
180.	The level of participation SHALL be as follows: • At a minimum, each State, within an Ingestion Pathway Zone (IPZ), SHALL exercise its plans and preparedness related to ingestion exposure pathway measures at least once every 8 years. The States of Minnesota and Wisconsin should rotate this participation from between Monticello and Prairie Island sites.	**Section N.2.b** Not applicable to the licensee	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
181.	Local governments having ingestion pathway responsibilities should also participate. At a minimum, local entities should, during the year the full participation ingestion exercise is held, review their plans and procedures to verify their accuracy and completeness.	**Section N.2.b** Not applicable to the licensee	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
182.	• The Utility should enable any State or local governments, located within the plume exposure pathway EPZ, to participate in annual full scale exercises when requested by such State or local government.	**Section N.2.a** State, county and tribal authorities are invited to participate in PEP exercises. If a state, county or tribal organization chooses not to participate it will be documented that they were given the opportunity to participate.	Language updated to reflect practice if ORO chooses not to participate. The SEP provides no change in practice or intent.
183.	The need for a remedial exercise under 10 CFR Part 50, Appendix E, Section IV.F.2.f will be determined on a case-by-case basis when any of the following conditions associated with a biennial exercise occurs: • Confidentiality is compromised to an extent that broadly affects ERO performance. • The scenario does not provide the opportunity for demonstration of key skills; the scenario is not implemented in such a way that provides the opportunity for demonstration of key skills. • ERO performance does not provide the NRC with a basis to determine that key skills have been maintained. • The extent of participation in a remedial exercise will also be determined on a case-by-case basis since only portions of the response may need to be re-demonstrated.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
184.	NSPM/Xcel Energy participants in drills and exercises SHALL be assigned from the staff listings in the Nuclear Emergency Preparedness Telephone Directory.	No equivalent statement	Language standardized between the three plans. Commitment remains to observe and critique drills and exercises. Obtaining controllers is a procedural level requirement.
185.	Controllers in drills and exercises should be trained in the Emergency Response Organization to which they are assigned duties.	No equivalent statement	Controller training will be addressed as part of the site EP Training Program.
186.	Official controllers from Federal, State or local governments will observe, evaluate, and critique the required exercises.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
187.	A critique SHALL be scheduled at the conclusion of the exercise to evaluate each organization's ability to respond as called for in the Emergency Plan. The critique SHALL be conducted as soon as practicable after the exercise, and a formal evaluation should result from the critique.	**Section N.1.a** Following exercises and drills, a critique is conducted by qualified Xcel Energy individuals to evaluate areas and identify issues with ERO performance, response procedures, facility and equipment adequacy. The critique is performed as soon as possible following the conclusion of a drill or exercise using preselected drill and exercise performance objectives that are evaluated against measurable demonstration criteria. Provisions are made for federal, state, and county representatives to observe and participate in drill and exercise critiques. A critique report is prepared by the EP group following a drill or exercise documenting objective demonstration. Failed or degraded performance objectives are entered into the corrective action program (CAP).	SEP standardizes wording between the three plans and aligned to the wording of the November 2011 Enhanced EP Rulemaking.
188.	Controller and participant comments should be evaluated, and corrective actions will be established by management control to ensure that Emergency Plan or Implementing Procedures are changed as required.	**Section N.1.b** The Xcel Energy CAP process provides for tracking and trending of issues in accordance with 10 CFR 50 Appendix B, Criterion XVI.	SEP documents intent for EP to use the existing Corrective Action Process for issues related to ERO performance in drills and exercises. There is no change in the SEP from past practice.

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189.	The exercise will be varied from year to year so as to test all major components of the plans and preparedness organizations, which may include federal emergency response agencies, within the applicable exercise cycle (8 years).	**Section N.3** During each eight-year exercise cycle, scenario content will address the following elements.	SEP Sections N.3 and N.4 specify the specifics needed to address the requirement as directed in NUREG-0654, Revision 2.
190.	Provisions should be made to start a drill or exercise between 6:00pm and 4:00am at least once in every exercise cycle. Some drills or exercises should be unannounced.	**Section N.1.c** Each Xcel Energy nuclear site will conduct at least one drill or exercise between 6:00 pm and 4:00 am within an eight-year exercise cycle. This requirement may be satisfied by an actual event provided it meets the above criteria and the objectives are evaluated and documented in a critique report for the augmentation of the ERO.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
191.		**Section N.1.d** Each Xcel Energy nuclear site will conduct at least one unannounced drill or exercise within an eight-year cycle. This requirement may be satisfied by an actual event provided objectives are evaluated and documented in a critique report for the augmentation of the ERO.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
192.	The details concerning scheduling, conduct and critique of drills and exercises are specified in site specific procedures.	**See lines 188 through 201 for details**	Drill and Exercise Section has been revised to reflect the criteria and frequency derived from the 2011 Enhanced EP Rulemaking.
193.		**Section N.3, N.3.a** Each Xcel Energy nuclear site will conduct at least one HAB scenario in a drill or exercise within an eight-year cycle. The HAB scenario will include either a radiological release scenario or no/minimal radiological release scenario. HAB scenarios combined with a no/minimal radiological release scenario will not be used consecutively in exercises.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.

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194.		**Section N.3.b** Each Xcel Energy nuclear site will conduct at least one rapid escalation scenario in a drill or exercise within an eight-year cycle. The rapid escalation scenario will begin with an initial classification of or rapidly escalate to the Site Area Emergency or General Emergency level.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
195.		**Section N.3.c** Each Xcel Energy nuclear site will conduct at least one No/Minimal radiological release scenario that escalates to a Site Area Emergency but does not require escalation to the General Emergency classification level with PARs in a drill or exercise within an eight-year cycle.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
196.		**Section N.3.c.1** State and county agencies located within the plume exposure pathway EPZ are invited to participate in No/Minimal radiological release scenarios.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
197.		**Section N.3.c.2** When planning for a joint no/minimal radiological release exercise, affected parties will identify offsite capabilities that may still need to be evaluated.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
198.		**Section N.3.d** Each Xcel Energy nuclear site will conduct at least one scenario that integrates offsite resources with onsite response in an exercise within an eight-year cycle. Demonstration of resource integration includes briefings, offsite response to the site and coordination of worker protection, as appropriate to the scenario.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.

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199.		**Section N.3.e** Each Xcel Energy nuclear site will conduct at least one scenario in a drill or exercise within an eight-year cycle to demonstrate strategies and guidelines to maintain or restore core cooling, containment, or spent fuel pool cooling capabilities under the circumstances associated with the loss of large area due to explosions or fire. Strategies to be demonstrated may include one or more of the following: • Fire fighting • Operations to mitigate fuel damage • Actions to minimize radiological release	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
200.		**Section N.4, N.4.a** Each Xcel Energy nuclear site will conduct an emergency medical drill once per calendar year. The scope of the emergency medical drill will include a simulated contaminated individual and invitation for participation by support services agencies.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
201.		**Section N.4.d** Each Xcel Energy nuclear site will conduct an environmental monitoring drill once per calendar year. The scope of the environmental monitoring drill will include performance objectives for direct radiation measurements in the environment, collection and analysis of sample media including water, vegetation, soil, and air, provisions for communications and record keeping.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
202.		**Section N.4.g** Testing of Post-accident sampling systems are completed as a function of site Technical Specifications.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.

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203.		**Section N.4.h** Each Xcel Energy nuclear site will conduct an off-hours unannounced ERO report-in augmentation drill biennially. The EOF will participate concurrent with either of the Xcel Energy nuclear sites.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
204.		**Section N.4.i** Each Xcel Energy nuclear site and the EOF will conduct an off-hours call-in drill quarterly. Some call-in drills will be unannounced. The scope of the off-hours call-in drill will require ERO member's response regarding ability to respond to their applicable facility within the required augmentation time. Each Table B-1 ERO member's ability to respond within the required augmentation time will be assessed at least biennially.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
205.		**Section N.4.j** Each Xcel Energy nuclear site will conduct a protective action drill within an eight-year cycle. The scope of the protective actions drill will demonstrate the ability to implement and coordinate protective actions for onsite personnel during a hostile action.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
206.		**Section N.4.k** Each Xcel Energy nuclear site will conduct an aircraft threat/attack response drill within an eight-year cycle.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
207.	5.8.2 Drills		
208.	A drill is a supervised instruction period aimed at testing, developing and maintaining skills in a particular operation.	**Section N.1** Drills are supervised instructional periods aimed at testing, developing and maintaining skills in a particular operation and are a part of the	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
209.	A drill is often a component of an exercise.	continuous training program and is often a component of an exercise.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
210.	Each drill is supervised and evaluated by a qualified drill coordinator.	**Section N.1.a** Following exercises and drills, a critique is conducted by qualified Xcel Energy individuals to evaluate areas and identify issues with ERO performance, response procedures, facility and equipment adequacy. The critique is performed as soon as possible following the conclusion of a drill or exercise using preselected drill and exercise performance objectives that are evaluated against measurable demonstration criteria. Provisions are made for federal, state, and county representatives to observe and participate in drill and exercise critiques. A critique report is prepared by the EP group following a drill or exercise documenting objective demonstration. Failed or degraded performance objectives are entered into the corrective action program (CAP).	SEP retains the commitment to conduct a critique after all drills.
211.	The utility will conduct drills at intervals specified in site specific procedures and their respective Drill and Exercise Manual.	**Sections N.3 and N.4**	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking
212.	5.8.3 Training		
213.	NSPM/Xcel Energy will assure that radiological emergency response training is provided to those who may be called upon to assist in an emergency.	**Section O.1.a** Xcel Energy offers emergency response training annually for those offsite organizations that may be called upon to provide onsite assistance in the event of an emergency. They are invited to	SEP standardizes the language between the three existing plans without changing existing practices or intent to train ORO personnel supporting response.

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214.	Training will also be provided for the person(s) designated as responsible for the planning effort.	attend training applicable to the Xcel Energy nuclear site or sites where they could provide assistance. Training of state and county offsite response organizations is described in their respective radiological emergency plans, with support provided by Xcel Energy, if requested.	SEP standardizes the language between the three existing plans without changing existing practices or intent to train ORO personnel supporting response.
215.	1. Qualification of and training for the Monticello and Prairie Island Offsite Emergency Response Organization consists of initial overview training and position specific training. The training program for site and EOF ERO members is described in the site-specific procedures.	**Section O.1** Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency. Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
216.	2. Initial Overview Training Training SHALL introduce the EP personnel to the basis for nuclear power plant radiological emergency preparedness. It should include: a. Protective Action Recommendations b. Emergency Action Levels and Classifications c. Introduction to Emergency Plans of Monticello, Prairie Island and local Government d. Emergency Response Organization and Communication e. EP Objectives	**Section O.2** The EP Training Program Description identifies the training requirements for initial qualification, continuing training, and requalification of the ERO. Training will be evaluated in accordance with the principles of the Systematic Approach to Training (SAT) practices to ensure effectiveness and in order to identify areas that need improvement or correction.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
217.	3. Position specific training SHALL qualify the EP personnel in the position for which they have been nominated. It should include: a. Detailed review of applicable procedures b. Opportunity to practice the role of nominated position c. Mini drill or table top simulations/discussions		SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
218.	The Utility will assist in the training of those offsite emergency organizations who may be called upon to provide assistance in the event of an emergency.	**Section O.1** Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency. Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
219.	Each offsite response organization will participate in and receive training which will be coordinated by the appropriate governmental agencies.	No equivalent statement	SEP documents the licensee commitment to offer training to appropriate ORO personnel. Management of the training population is outside the control of the site program.
220.	Where mutual aid agreements exist between local agencies such as fire, police, ambulance/rescue, and other departments that are members of the mutual aid district, training will also be offered.	**Section O.1** Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency. Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
221.	Annual training for hospital personnel, ambulance/rescue and fire departments will include the procedures for notification, basic radiation protection and the appropriate Implementing Procedures.		SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
222.	For local services and support organizations who may enter the site, training will include orientation to site access procedures and to the onsite emergency organization that will control the support activities.		SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
223.	All emergency organization members will be required to periodically participate in drills and exercises in which each person demonstrates the ability to perform his assigned tasks in an emergency situation.	**Section O.2.b** Training sessions providing performance enhancing opportunities for key positions are evaluated in order to identify weak or deficient areas that need correction for the key skills demonstrated.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
224.	Personnel who implement radiological facets of the Emergency Response Plan will receive a training program to qualify them, per the Implementing Procedures that pertain to surveys, accident assessment, decontamination, and emergency mitigation.	**Section O.1** Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency. Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
225.	Training was presented initially when all plans and procedures were finalized, and re training will be conducted annually in accordance with the Emergency Response Training Plans.		SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
226.	Emergency response personnel will be trained for the following categories: 1. Directors or Coordinators of the Emergency Response Organizations 2. Accident assessment personnel 3. Radiological monitoring teams and radiological analysis personnel 4. Security and fire-fighting personnel 5. Personnel responsible for transmission of emergency information and instructions 6. Onsite repair and damage control teams 7. First aid and rescue personnel 8. Medical support personnel 9. Local law enforcement personnel 10. Local Civil Defense/Emergency Service personnel 11. Media personnel 12. State Government Agencies	**Section O.1** Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency. Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
227.		**Section O.2.a** Revisions to the training program are identified with feedback from trainees in training and critique items during drills. EP training is also reviewed during EP assessments at the Xcel Energy nuclear sites. During assessments, ERO and EP staff performance is reviewed and appropriate revisions to the training program are made.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
228.	5.9 Maintenance of Plans and Procedures		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
229.	5.9.1 Review of Plans		
230.	In accordance with 10CFR 50.54(t) the Utilities Procedures and Surveillances provide for the conduct of an annual independent adequacy review of the Monticello and Prairie Island Offsite Emergency Preparedness Program. (The independent review may be conducted by either an internal or external organization.)	**Section P.9** An independent review will be conducted in accordance with the requirements of 10 CFR 50.54(t)(2). The review findings will be submitted to the appropriate corporate and site management. The part of the review involving the evaluation of the adequacy of interface with state and county governments will be reported to the appropriate state and county governments. Corporate or site management, as appropriate, will evaluate the findings affecting their area of responsibility and ensure effective corrective actions are taken. The results of the review, along with recommendations for improvements, will be documented, and retained.	SEP standardizes the language between the three existing plans without changing past practices or intent.
231.	Individuals who have no direct responsibility for implementation of the Emergency Preparedness Program will conduct the review.		SEP standardizes the language between the three existing plans without changing past practices or intent.
232.	The review will include the Emergency Plans, Implementing Procedures, training, readiness testing, interface with state and local organizations, and equipment.		SEP standardizes the language between the three existing plans without changing past practices or intent.
233.	Management controls will be implemented for evaluation and correction of review findings.		SEP standardizes the language between the three existing plans without changing past practices or intent.
234.	The result of the review will be documented, reported to appropriate organizational management and retained in accordance with 10 CFR 50.54(t) (2).		SEP standardizes the language between the three existing plans without changing past practices or intent.
235.	The part of the review involving the evaluation for adequacy of interface with state and local governments SHALL be made available to the appropriate state and local governments.		SEP standardizes the language between the three existing plans without changing past practices or intent.
236.	In addition, the Utility will review and update plans and procedures as needed and they will be certified to be current on an annual basis.	**Section P.4** The SEP and associated documents as identified herein, are reviewed on an annual basis and updated if necessary. Changes due to regulatory revisions, issues identified by drills and exercises, or other updates will be incorporated.	SEP standardizes the language between the three existing plans without changing past practices or intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
237.	The update will take into account changes identified during drills and exercises. Other reviews of the Emergency Plan and Implementing Procedures will be performed as required by Technical Specifications.	**Section P.4** Agreements with supporting organizations will be reviewed and certified to be current on an annual basis and updated, if necessary. Changes to agreements may be coordinated with the annual review of the SEP. Emergency Plan changes will be processed in accordance with 10 CFR 50.54(q) requirements and fleet document control/records management procedures. ETE updates are completed in accordance with 10 CFR 50, Appendix E, IV.4, 5 & 6.	SEP standardizes the language between the three existing plans without changing past practices or intent.
238.	5.9.2 Control of Plans and Procedures		
239.	Emergency Plans and approved changes will be distributed in a controlled manner. Assigned copies of state and local plans, required at specific locations within the NSPM/Xcel Energy organization, will be updated in the same controlled manner.	**Section P.5** Approved changes to the SEP, associated documents and implementing procedures will be transmitted in accordance with the distribution list maintained in the Electronic Document Management System (EDMS).	SEP standardizes the language between the three existing plans without changing past practices or intent.
240.	When making revisions to the Monticello and Prairie Island Off-site Nuclear Emergency Plan, the section of the plan containing the changes will be revised and issued as a whole.	**Section P.5** Approved changes to the SEP, associated documents and implementing procedures will be transmitted in accordance with the distribution list maintained in the Electronic Document Management System (EDMS).	Incorporation of the three plans and the maintenance of the change processed described in Section P.5 eliminates the need for the previously existing statement.
241.	The plan will be marked (side barred) to show where changes have been made. The review, revision and issuance of controlled copies of the Nuclear Emergency Plans will be conducted in accordance with standard Utility procedures for document control	No equivalent statement	The commitment to use the EDMS system documents the methodology for tracking changes.
242.	5.9.3 Surveillance Program		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
243.	A Surveillance Program has been developed to ensure that Monticello and Prairie Island Offsite Nuclear Emergency Plan facilities and procedures are in a current state of readiness.	**Section P.4** The SEP and associated documents as identified herein, are reviewed on an annual basis and updated if necessary. Changes due to regulatory revisions, issues identified by drills and exercises, or other updates will be incorporated. **Section P.11** Xcel Energy CAP is used to capture conditions that do not meet program regulations, requirements, or expectations, or are otherwise adverse to quality.	SEP Plan commitment to review the program and the subsequent commitment to use the formal CAP system standardizes the previous commitment.
244.	Communication links with federal, state, and county governments are tested monthly, and inventories of equipment are conducted quarterly	**Section F.3** Communications tests will be conducted and documented on the frequency specified below. The tests include provisions to ensure participants in the test are able to understand the content of the messages in the test. • Systems used to communicate with state and county government warning points within the plume exposure pathway EPZ will be tested monthly. • Systems used to communicate from the MCR, TSC, and EOF to NRC Headquarters and NRC Regional Office Operations Center are tested monthly.	SEP standardizes the language between the three existing plans without changing past practices or intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
245.	Communication links with federal, state, and county governments are tested monthly, and inventories of equipment are conducted quarterly.	• Systems used to communicate with state and county government EOCs are tested annually. • Systems used to communicate between Xcel Energy ERFs, and from the applicable ERF to the FMTs, are tested annually. • Systems used to communicate with Federal emergency response organizations are tested annually. • The ERDS is verified as connected and transmitting data on a quarterly basis. ANS testing frequency is described in site-specific annexes.	SEP standardizes the language between the three existing plans without changing past practices or intent.
246.	Surveillances have also been prepared to conduct the Annual Independent Review, Quarterly inventory, and the quarterly updating of emergency response telephone numbers.	**Section P.12** Changes in plant configuration are evaluated for their impact on the effectiveness of the emergency plan through the Applicability Determination process specified in Regulatory Affairs procedures and, if required, the 10 CFR 50.54(q) process specified in EP procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.
247.	The Emergency Planning Zone (EPZ) brochure/calendar, Ingestion Planning Zone (IPZ) brochure, and handouts for transients are reviewed annually and updated, as needed	**Section G.5** At least once a year, both states will conduct training programs or send mailings to acquaint the news media with the emergency plans and to provide information concerning radiation and points of contact for release of public information in an emergency. Xcel Energy has input to this process.	SEP standardizes the language between the three existing plans without changing past practices or intent.
248.	5.10 Emergency Medical Plan	**Section L**	
249.	5.10.1 Emergency Medical Plan Objective		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
250.	The purpose of this section is to provide an overview of the process to be followed to ensure that prompt, effective and complete medical assistance is available to a nuclear power plant employee in the event of an accident involving an injury or illness which may be complicated by radiation exposure and/or contamination.	**Section L.2.b** Arrangements have been made with local hospitals for the medical treatment of contaminated injured personnel. Primary and backup offsite medical facilities to treat contaminated injured personnel are described in the site-specific annexes.	SEP standardizes the language between the three existing plans without changing past practices or intent.
251.	To provide the best medical treatment possible for its employees, the Utility has made arrangements with certain off-site medical facilities to care for radiation complicated injuries or illnesses.		SEP standardizes the language between the three existing plans without changing past practices or intent.
252.	Because these facilities have special equipment, expertise and training, these facilities will be used for this infrequent, but specialized patient care.	**Section L.2.c** Xcel Energy personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Hospitals are equipped and hospital personnel trained to address contaminated injured individuals and basic training on the nature of radiological emergencies. Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
253.		**Section L.4** In addition to the information provided in element L.2, radiation monitoring is provided by Xcel Energy personnel whenever it becomes necessary to use an ambulance service for the transportation of contaminated persons. Injured personnel are evaluated for radiological contamination using contamination control practices to transport to a medical facility per radiation protection procedures. Xcel Energy personnel will assist with decontamination of transport vehicles if necessary. Ambulance services are described in the site-specific annexes.	SEP standardizes the language between the three existing plans without changing past practices or intent.
254.	Any referral of NSPM/Xcel Energy employees outside of this off-site medical system will be done at the direction of the Utility Medical Review Officer or as the family requests.	**Section L.2.d & L.2.e** Injured personnel are evaluated for radiological contamination prior to transport to a medical facility per radiation protection department procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.
255.	For Monticello Nuclear Generating Plant, the principle off site medical support consists of: • CentraCare Health EMS (ambulance) Monticello, MN • CentraCare Health, Monticello, MN • North Memorial Medical Center, Minneapolis, MN • Regions Hospital • St. Cloud Hospital (CentraCare) St Cloud, MN	Monticello Annex, Section L.2.b Also - See Monticello Justification Matrix for description contained in Monticello Annex.	Description of Site Specific Offsite Medical Support Facilities relocated to respective Site Annex.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
256.	For Prairie Island Nuclear Generating Plant the principle off site medical support consists of: • Red Wing Fire and Ambulance Service • Mayo Clinic Health System-Red Wing • Regions Hospital • North Memorial Medical Center, Minneapolis, MN	Prairie Island Annex, Section L.2.b Also - See Prairie Island Justification Matrix for description contained in Prairie Island Annex.	Description of Site Specific Offsite Medical Support Facilities relocated to respective Site Annex.
257.	5.10.2 Activation/Plant		
258.	1. The Shift Manager/Emergency Director is responsible for assessing the extent of injuries, radiation exposure and/or contamination that an individual may have received during their shift.	**Section B.1.a** The requirements for on-shift operations staff, security force staff, fire brigade and first aid staff are controlled by site-specific Technical Specifications and other site-specific licensing and administrative documents. Positions from these departments are contained in the emergency plan only when assigned an EP function that is performed during an event.	Provision revised to align with NUREG-0654, Revision 2, intent to align Plan to EP Functional performance and eliminate functions controlled by other site approved Plans/requirements.
259.	Their assessment of the personnel, injured with or without radiation exposure or contamination, is to include the need for offsite medical assistance.		Provision revised to align with NUREG-0654, Revision 2, intent to align Plan to EP Functional performance and eliminate functions controlled by other site approved Plans/requirements.
260.	The Shift Manager/Emergency Director can use any member of the Corporate Medical staff to evaluate the extent of such injuries, if such an individual is available.		Provision revised to align with NUREG-0654, Revision 2, intent to align Plan to EP Functional performance and eliminate functions controlled by other site approved Plans/requirements.
261.	Additionally, the Shift Manager/Emergency Director can use any available Health Physics expertise to evaluate the victim's radiation exposure or contamination.		Provision revised to align with NUREG-0654, Revision 2, intent to align Plan to EP Functional performance and eliminate functions controlled by other site approved Plans/requirements.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
262.	Once the Shift Manager/Emergency Director has determined that off-site medical assistance is necessary, it is their responsibility to ensure that the local medical hospital and ambulance group are contacted, in accordance with the Plant Emergency Implementing Procedures, to arrange for transportation of the victims.	**(Continued)**	Provision revised to align with NUREG-0654, Revision 2, intent to align Plan to EP Functional performance and eliminate functions controlled by other site approved Plans/requirements.
263.	2. The Plant Emergency Implementing Procedures describe how the hospital is to be notified and discusses what information the hospital needs to ensure their emergency rooms are prepared to receive the potentially contaminated/over exposed, injured victim.	**Section B.1.a** The requirements for on-shift operations staff, security force staff, fire brigade and first aid staff are controlled by site-specific Technical Specifications and other site-specific licensing and administrative documents. Positions from these departments are contained in the emergency plan only when assigned an EP function that is performed during an event.	Provision revised to align with NUREG-0654, Revision 2, intent to align Plan to EP Functional performance and eliminate functions controlled by other site approved Plans/requirements.
264.	5.10.3 Activation/Local Hospital		
265.	The local hospital or fire department is responsible for the transportation of all personnel from Monticello or Prairie Island Nuclear Generating sites.	**Section L.2.d** Injured personnel are evaluated for radiological contamination prior to transport to a medical facility per radiation protection department procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
266.	They will receive all NSPM/Xcel Energy personnel that are injured and/or contaminated and/or have received an overdose of ionizing radiation. The local hospital will provide initial medical treatment and decontamination care and, after the patient is stabilized, will arrange, if necessary, the transportation of patients to North Memorial Medical Center or Regions Hospital, via air or ambulance as weather dictates.	**Section L.2.c** Xcel Energy personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Hospitals are equipped and hospital personnel trained to address contaminated injured individuals and basic training on the nature of radiological emergencies. Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.
267.	Patients may be transferred directly to a Definitive Care Center if the injury(s) warrant.	No equivalent statement	The SEP retains the requirement to maintain offsite Medical support agreements as previously documented. Specific care practices are determined by the medical staff of the support facility and not Xcel Energy.
268.	Additionally, the local hospital could make contact with the Radiation Emergency Assistance Center/Training Site (REAC/TS) as deemed necessary, to seek further medical advice and expertise.	**Section A.1.a** Department of Energy (DOE)/Radiation Emergency Assistance Center/Training Site (REAC/TS) Support The DOE provides radiological assistance on request though the REAC/TS and has radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. Following a radiological incident, DOE operates as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP).	SEP standardizes the language between the three existing plans without changing past practices or intent.
269.	5.10.4 Activation/Definitive Care Center		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
270.	1. North Memorial Medical Center, located in Minneapolis and Regions Hospital in St. Paul, are designated by this Plan as Definitive Care Centers, in accordance with our current Letters of Agreement (Attachment 5).	**Section C.2** LOAs common to both sites include; • North Memorial Health Care • Regions Hospital	SEP standardizes the language between the three existing plans without changing past practices or intent.
271.	2. The Definitive Care Center will be responsible for providing definitive evaluation and treatment of more serious trauma, illness and for radiation overexposure. The personnel at the Definitive Care Center could contact the Radiation Emergency Assistance Center/Training Site (REAC/TS) for advice as necessary.	No equivalent statement	The SEP retains the requirement to maintain offsite Medical support agreements as previously documented. Specific care practices are determined by the medical staff of the support facility and not Xcel Energy.
272.	3. Should the need arise for further advanced medical treatment of radiation overexposure (for example, bone marrow transplant), this arrangement and decision will be made after evaluation of the patient by the medical staff at the Definitive Care Center, in consultation with the Utility Medical Review Officer/Medical Advisor, and any other medical consultants. The facilities (locally & nationally) able to perform this procedure will be described to the patient and family, and referral made according to their wishes.	No equivalent statement	The SEP retains the requirement to maintain offsite Medical support agreements as previously documented. Specific care practices are determined by the medical staff of the support facility and not Xcel Energy.
273.	5.10.5 Activation/Medical Resource Person		
274.	The Utility Medical Review Officer/Medical Advisor would be available to provide medical expertise on the extent of the injury, act as Company spokesperson, and assist in determination of when the services and/or advice of emergency medical assistance would be needed during a nuclear power plant event involving a contaminated/overexposed and/or injured individual.	No equivalent statement	The SEP retains the requirement to maintain offsite Medical support agreements as previously documented. Specific care practices are determined by the medical staff of the support facility and not Xcel Energy.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
275.	5.10.6 Activation of Emergency Medical Assistance		
276.	In the event of a suspected or actual radiation accident, where the aforementioned medical facilities need additional emergency medical assistance, this assistance can be provided by Radiation Emergency Assistance Center/Training Site (REAC/TS) and is available as a public agency on a 24-hour basis.	**Section L.2.e** Contact of the Radiation Emergency Assistance Center/Training Site (REAC/TS) is maintained per LOA.	The SEP retains the requirement to maintain offsite Medical support agreements as previously documented. Specific care practices are determined by the medical staff of the support facility and not Xcel Energy.
277.	The assistance is comprised of, but not limited to the following: 1. Upon notification, establish immediate means of communication between emergency response personnel and all other facilities involved in the management of the accident. 2. Provide consultation and laboratory services for the evaluation of the patient's radiological health status, if requested. 3. Assist the local hospital and/or the Definitive Care Center in the evaluation and the care of the accident victim. 4. Assist or provide a list of commercial entities that could provide support of the Utility Medical Review Officer/Medical Advisor in the arrangement for evacuation of the radiation over exposed patient(s) to a medical center for advanced treatment, if necessary.	**Section L.2.c** Xcel Energy personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Hospitals are equipped and hospital personnel trained to address contaminated injured individuals and basic training on the nature of radiological emergencies. Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.
278.	Additional medical consultants will be requested as determined by the Utility Emergency and Medical Management.		SEP standardizes the language between the three existing plans without changing past practices or intent.
279.	5.10.7 Multiple Patients		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
280.	If multiple patients result from an accident, they will be triaged and decontaminated, if necessary, according to accepted medical principles at each level of care, starting at the plant site.	**Section L.2.c** Xcel Energy personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Hospitals are equipped and hospital personnel trained to address contaminated injured individuals and basic training on the nature of radiological emergencies. Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.
281.	5.10.8 Medical Drills and Training	**Section L.2.b** Arrangements have been made with local hospitals for the medical treatment of contaminated injured personnel. Primary and backup offsite medical facilities to treat contaminated injured personnel are described in the site-specific annexes.	SEP standardizes the language between the three existing plans without changing past practices or intent.
282.	The objective of medical training and drills is to ensure prompt, effective and complete medical assistance is available to site personnel in the event of an accident involving injury which is complicated by radiation exposure and/or contamination.		
283.	To meet this objective, NSPM/Xcel Energy will provide training and conduct drills to ensure that personnel at all levels of care (plant, ambulance, local hospitals and occasionally, definitive care centers) can respond properly to a radiation emergency medical problem.	**Section N.4.a** Each Xcel Energy nuclear site will conduct an emergency medical drill once per calendar year. The scope of the emergency medical drill will include a simulated contaminated individual and invitation for participation by support services agencies.	SEP standardizes the language between the three existing plans without changing past practices or intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
284.	Training covering methods of dealing with radiation and contamination problems during a medical emergency will be provided annually for the following off-site and on-site Emergency Response groups: 1. Site First Responder Personnel 2. Local hospital personnel, Emergency Room staff 3. Physicians Training will be offered periodically 4. Ambulance personnel, Emergency Medical Technicians 5. Definitive Care personnel and other medical staff that may be involved in the care of patients with radiological concerns	**Section L.2.c** Xcel Energy personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Hospitals are equipped and hospital personnel trained to address contaminated injured individuals and basic training on the nature of radiological emergencies. Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.
285.	All medical drills and training to support the Medical Plan are described in the Emergency Preparedness Training Program.	**Section N.4.a** Each Xcel Energy nuclear site will conduct an emergency medical drill once per calendar year. The scope of the emergency medical drill will include a simulated contaminated individual and invitation for participation by support services agencies.	SEP standardizes the language between the three existing plans without changing past practices or intent.
286.	5.10.9 Program Maintenance		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
287.	In order to maintain an effective on-site and off-site response program, the following tasks will be performed: 1. Conduct periodic inventories of plant and hospital equipment and supplies used for handling radiation medical emergencies. Replenish supplies as necessary, based on inventory results or as requested by hospital or ambulance staff. The results of these periodic surveillances are to be filed by the respective plant. 2. Perform periodic review of hospital telephone numbers and communication checks. The responsibility of this review and communications check will be the respective plants for the local hospitals and the Offsite planning group will perform the communication check with North Memorial Medical Center and Regions Hospital. 3. Periodic review and inventories should be done at least annually.	No equivalent statement	The SEP retains the commitment for support agreements, training and periodic drills with offsite medical support facilities. NUREG-0654, Revision 2, no longer addresses procedural level detail needed to maintain these commitments.
288.	5.11 Implementing Procedures	**Section P.7, Table P.7-1**	
289.	FP-EP-IP-01, “Offsite Emergency Response Organization”	No equivalent statement	SEP will be supported by functional based procedures developed in conjunction with NRC approval of the Consolidated Plan. These procedures will be replaced in the implementation process.
290.	FP-EP-IP-02, “Emergency Organization Shift Turnover”	No equivalent statement	SEP will be supported by functional based procedures developed in conjunction with NRC approval of the Consolidated Plan. These procedures will be replaced in the implementation process.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
291.	FP-EP-IP-03, "Communication Equipment and Information"	No equivalent statement	SEP will be supported by functional based procedures developed in conjunction with NRC approval of the Consolidated Plan. These procedures will be replaced in the implementation process.
292.	FP-EP-IP-04, "Start-up and Operation of SEOC/JIC (and Remote Locations)"	No equivalent statement	SEP will be supported by functional based procedures developed in conjunction with NRC approval of the Consolidated Plan. These procedures will be replaced in the implementation process.
293.	Supplemental Procedure – Nuclear Communication Plan	No equivalent statement	SEP will be supported by functional based procedures developed in conjunction with NRC approval of the Consolidated Plan. These procedures will be replaced in the implementation process.
294.	**Plan Attachments**		
295.	Attachment 1 Offsite Emergency Response Organization Chart	SEP Table B-1 and Figures B-3 (EOF) and B-4 (JIV)	SEP consolidates the existing concept of onsite and offsite EROs into an integrated ERO.
296.	Attachment 2 Backup EOF Equipment	No equivalent statement	SEP proposes a consolidated EOF greater than 10 miles from the site eliminating the need for a specified BUEOF. See Enclosure 4 for description of proposed EOF.
297.	a. Corporate Phone System - A Failure Analysis of telephone lines has been conducted and it was determined that the Backup EOF has adequate failure protection. Telephone, radio, and private line circuits are spread between two feeder and riser cables to reduce the chances of a complete failure. Approximately two dozen commercial telephone lines are available for use.	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
298.	b. Facsimile Stations -Two facsimile machine extensions, to allow for incoming and outgoing faxes.	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
299.	c. 800 Mghz Paging System Radio	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
300.	d. NRC Phones - Should the NRC decide to co-locate at the Backup EOF, telephone lines have been assigned for this purpose.	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
301.	e. INPO Nuclear Network - A computer is available that can access the INPO Nuclear Network to send, receive, and retrieve messages.	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
302.	f. E-Mail - Equipment is available for sending electronic mail messages to both sites. Printers are available to print hard copies of messages sent.	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
303.	2. Backup EOF Phones Monticello Specific a. Technical Support Communicator (Status Board) Telephone extension b. Monticello Field Survey Team Radio	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
304.	3. Backup EOF Phones Prairie Island Specific a. Technical Support Communicator (Status Board) Prairie Island Plant extension b. Prairie Island Field Survey Team Radio	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
305.	4. Minnesota State EOC/JIC a. Telephone Lines - NSPM/XCEL ENERGY Executive Spokesperson 1) General Office extension and a Rice Street extension 2) Facsimile Machine – General Office extension 3) Facsimile Machine MN Dept. of Health extension b. 800 Mghz Paging System Radio	**Section G.2** The JIC provides the necessary structure and mechanism for organizing, developing, integrating, and delivering coordinated interagency messages via established plans, procedures, and strategies.	SEP standardizes the language between the three existing plans without changing past practices or intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
306.	Attachment 3 Monticello (Medical Care Chart)	**Corporate Plan Section L** **Monticello Site Annex Section L**	The Standard Plan and Site Annexes provide Medical Support in alignment with the format of NUREG-0654, Revision 2. Separate Medical Care Attachments are no longer required.
307.	Attachment 4 Prairie Island (Medical Care Chart)	**Corporate Plan Section L** **Prairie Island Site Annex Section L**	The Standard Plan and Site Annexes provide Medical Support in alignment with the format of NUREG-0654, Revision 2. Separate Medical Care Attachments are no longer required.
308.	Attachment 5 Letters of Agreement	**Section C.2** LOAs common to both sites include; • Institute of Nuclear Power Operations (INPO) • State of Minnesota, Department of Public Safety Division of Homeland Security and Emergency • Regions Hospital • Environmental Inc, Midwest Laboratory • Department of Energy – REAC/TS • North Memorial Health Care • Pooled Equipment Inventory Co (PEICo)	SEP standardizes the language between the three existing plans without changing past practices or intent.
309.	Attachment 6 Radiation Environment Monitoring Plan Activation of the Radiation Environmental Monitoring Program (REMP) is accomplished through existing Site Emergency Plan Implementing Procedures.	No equivalent statement	Incorporation of the three Emergency Plans into the consolidated SEP eliminates the need for the attachment.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
310.	In addition, a Letter of Agreement between the NSPM/Xcel Energy and Environmental, Inc. Midwest Laboratory exists which states Environmental, Inc. Midwest Laboratory will respond upon request to augment our environmental sampling and monitoring program.	**Section C.2** LOAs common to both sites include; • Environmental Inc, Midwest Laboratory	SEP standardizes the language between the three existing plans without changing past practices or intent.
311.	Attachment 7 Monticello and Prairie Island Conservative Guidance for PARs	**See SEP Section I**	Section I of the SEP provides overall guidance for the determination of PARs. Separate attachment no longer is required.
312.	Attachment 8 Evacuation Time Estimates – Prairie Island	**Prairie Island Evacuating Time Estimate (EPLAN-07)**	SEP incorporates the respective Plant ETEs into the Plan as a stand-alone document contained within the overall Plan Structure.
313.	Attachment 9 Evacuation Time Estimates – Monticello	**Monticello Evacuation Time Estimate Study (EPLAN-06)**	SEP incorporates the respective Plant ETEs into the Plan as a stand-alone document contained within the overall Plan Structure.
314.	Attachment 10 Offsite Nuclear Emergency Plan Cross-Reference Index	No equivalent statement	SEP structure has been developed to provide the cross-reference guidance to NUREG-0654 within the structure of the Plan itself. Cross reference attachment no longer required.

ENCLOSURE 2

ATTACHMENT 3

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

MONTICELLO NUCLEAR PLANT
CHANGE JUSTIFICATION MATRIX

(161 Pages Follow)

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
1.	**SECTION 1.0 DEFINITIONS AND ABBREVIATIONS**	**Section III: Appendices, Appendix A**	
2.	**1.1 Assessment Action** - Actions taken during or after an accident to obtain and process information necessary to make decisions regarding emergency measures.	No equivalent statement	Terminology not used in Standard Plan.
3.	**1.2 Committed Dose Equivalent (CDE)** - refers to the dose received over the 50 year period following an intake of radioactive materials.	**Appendix A** CDE is the dose equivalent to organs or tissues of reference that will be received from an intake of radioactive material by an individual during the 50-year period following the intake.	Standardized language using ICRP language.
4.	**1.3 Committed Effective Dose Equivalent (CEDE)** - is the sum of the products of the weighted factors applicable to each of the body organs or tissues that are irradiated and the committed dose equivalent to these organs or tissue.	**Appendix A** CEDE is the sum of the products of the weighting factors applicable to each of the body organs or tissues that are irradiated and the CDE to these organs or tissues.	Standardized language using ICRP language.
5.	**1.4 Corrective Actions** – Emergency measures taken to terminate an emergency situation at or near the source in order to prevent or minimize a radioactive release, e.g., shutting down equipment, firefighting, repair and damage control, etc.	No equivalent statement	Terminology not used in Standard Plan.
6.	**1.5 Effective dose equivalent (EDE)** - is the sum of the product of the absorbed dose in tissue, quality factors, and all other necessary modifying factors at the location of interest.	**Appendix A** EDE is the sum of the products of the dose equivalent to each organ or tissue and a weighting factor applicable to each of the body organs or tissues that are irradiated.	Standardized language using ICRP language.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
7.	**1.6 Emergency Action Level (EAL)** – A pre-determined, site-specific, observable threshold for an Initiating Condition that, when met or exceeded, places the plant in a given emergency classification level.	**Section D.1.a** EALs at Xcel Energy nuclear sites have been developed in accordance with NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors." This guidance has been approved by the NRC and is applicable to the reactor design at Xcel Energy nuclear sites.	Criterion revised to reflect criterion as noted in NRC approved guidance.
8.	**1.7 Emergency Director (ED)** – The Plant Manager or his designee. This individual has overall responsibility and authority for managing the emergency effort within the plant. The ED will also manage efforts external to the plant until relieved of those responsibilities by the Emergency Manager.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Provide overall ERO command and control until relieved. • Evaluate plant conditions and approve Emergency Action Level (EAL) classifications until relieved. • Approve Protective Action Recommendations (PARs) until relieved. • Authorize personnel dose extensions until relieved. • Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs until relieved. • Direct radiation protection activities, including Field Monitoring Team (FMT) direction until relieved. • Provide relevant information to personnel communicating offsite PARs to OROs until relieved. • Direct and approve offsite emergency notifications to state and county authorities until relieved.	Terminology standardized and revised to clarify specific responsibilities with respect to Emergency Plan functions.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
9.	**1.8 Emergency Manager (EM)** – This person is responsible to direct the overall MNGP emergency response effort. The EM will assume control of the Emergency Operations Facility and direct NSPM Emergency response efforts.	**Section B.1.a** Emergency Manager • Provide overall event response and control • Approve notifications to state/local offsite agencies • Approve PARs	Terminology standardized and revised to clarify specific responsibilities with respect to Emergency Plan functions.
10.	**1.9 EOF** – Emergency Operations Facility	**Section H.3** The EOF is a dedicated facility located in conjunction with Xcel Energy's general offices in Minneapolis and serves as the EOF for Xcel Energy sites. Access to the EOF is controlled using electronic card readers. The EOF is required to be activated within 90 minutes following the declaration of an Alert or higher classification. The EOF has the capability to display vital plant data and radiological information for each site and unit, in near real time, to be used by knowledgeable individuals responsible for providing technical briefings on plant conditions, event prognosis, and for management of overall emergency response. The EOF provides reliable voice communications to each site's MCR, TSC, OSC, the NRC, and state and county warning points and EOCs.	Facility definition provided in facilities description.
11.	**1.10 Emergency Planning Zones** – A defined area around the plant to facilitate emergency planning by state and local authorities, to assure that prompt and effective actions are taken to protect the public in the event of a release of radioactive material. It is defined for:	**Appendix A** A defined area around the plant to facilitate emergency planning by state and local authorities, to assure that prompt and effective actions are taken to protect the public in the event of a release of radioactive material. It is defined for:	No Change

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
12.	• Plume Exposure Pathway – A 10 mile radius around the plant where the principal exposure source is: (1) whole body exposure to gamma radiation from the plume and from deposited material; and (2) inhalation exposure from the passing radioactive plume (Short Term Exposure).	**Appendix A** Plume Exposure Pathway – A 10-mile radius around the plant where the principal exposure source is: (1) whole body exposure to gamma radiation from the plume and from deposited material; and (2) inhalation exposure from the passing radioactive plume (Short Term Exposure).	No Change
13.	• Ingestion Exposure Pathway – A 50 mile radius around the plant where the principal exposure would be from the ingestion of contaminated water or foods such as milk or fresh vegetables (Long Term Exposure).	**Appendix A** Ingestion Exposure Pathway – A 50-mile radius around the plant where the principal exposure would be from the ingestion of contaminated water or foods such as milk or fresh vegetables (Long Term Exposure).	No Change
14.	**1.11 ERDS** – Emergency Response Data System	**Section H.10** The ERDS will supply the NRC with selected meteorological data points on a near real time basis. The selected ERDS data points are transmitted via Virtual Private Network (VPN) to the NRC at approximately 1-minute intervals.	Definition is included as part of Section H.10.
15.	**1.12 ERF Communicator** - Individual qualified to perform duties as Plant Status Communicator in the TSC, OSC, or EOF.	No equivalent statement	Position specific title is not used in the standard plan. Staffing justification is provided in Enclosure 1 Section B of this submittal.
16.	**1.13 Emergency Worker** – An individual who has an essential mission to protect the health and safety of the public, who could be exposed to ionizing radiation from the plume or from its deposition. Emergency workers may or may not be individuals normally exposed to ionizing radiation as a part of their occupations. Ultimately, state and local authorities designate what categories of workers are classified as emergency workers.	**Appendix A** Any individual involved in mitigating the consequences of an emergency situation and/or minimizing or preventing exposure to the offsite population.	Language standardized in the proposed Plan. No change in intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
17.	**1.14 Facility Activation** – An Emergency Response Facility is activated when the minimum staff per Figure 13.1 is available and the facility is ready to assume its assigned Emergency Plan functions and relieve the on-shift staff of those functions. Although the facility may be ready, the on-shift staff relief may be postponed in the interests of completing critical tasks prior to turnover.	**Appendix A** An Emergency Response Facility is activated when the minimum staff per Figures B-1, B-2 and B-3 are available and the facility is ready to assume its assigned Emergency Plan functions and relieve the on-shift staff of those functions. Although the facility may be ready, the on-shift staff relief may be postponed in the interests of completing critical tasks prior to turnover.	Language standardized, updated to align with 2011 Rulemaking language, and revised to reflect Standard Plan ERF facility staffing. See Enclosure 1 Section B for detailed justification of staffing.
18.	**1.15 FTS** – Federal Telephone System	**Section F.1.b** Detail not entered due to volume. Specific commitments to support NRC links are provided including ENS, HPN, RSCL, PMCL, MCL, Security Bridge.	Terminology not used in Standard Plan. Specific channels used for communication with the NRC are described in Section F.1.b. Specific FTS system no longer noted to permit flexibility in system use.
19.	**1.16 Initiating Condition (IC)** – An event or condition that aligns with the definition of one of the four emergency classification levels by virtue of the potential or actual effects or consequences.	**Section D.1.a** EALs at Xcel Energy sites have been developed in accordance with NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors." This guidance has been approved by the NRC and is applicable to the reactor design at Xcel Energy sites.	Terminology used as part of EAL description rather than stand-alone definition. Section D.1.a commits to use of NEI 99-01 EALs which uses IC as part of the EAL.
20.	**1.17 Northern States Power Company – Minnesota (NSPM)** - is the operator of the Monticello Nuclear Generating Plant.	**Section I, Introduction, Purpose** The Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy.	Terminology not required as a separate Definition. Section I provided description of company and applicable
21.	**1.18 OSC** – Operational Support Center	No equivalent statement	Facility defined as part of Section H facility description. (H.2)
22.	**1.19 PASS** – Post–Accident Sampling System	No equivalent statement	Specific definition is not used in Standard Plan. Sampling capabilities are described in Section
23.	**1.20 Protective Actions** – Emergency measures taken before or after a release of radioactive materials in order to prevent or minimize radiological exposures to the population.	**Appendix A** Emergency measures taken to avoid or reduce radiation dose. These commonly include sheltering, evacuation, and prophylaxis.	Language standardized in the Standard Plan.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
24.	**1.21 Protective Action Guides (PAG)** – Projected dose to individuals that warrants protective action prior to and/or following a radioactive release.	**Appendix A** Projected dose to individuals, that warrants protective action prior to and/or following a radioactive release.	No Change
25.	**1.22 REC** – Radiological Emergency Coordinator	No equivalent statement	ERO positions have been standardized. See Enclosure 1 for detailed justification of standardized organization.
26.	**1.23 Recovery Actions** – Actions taken after an emergency to restore the plant to normal.	No equivalent statement	Specific definition is not used in Standard Plan. Section M of the proposed Standard Plan aligns with new organizational structure for Recovery.
27.	**1.24 SEC** – Shift Emergency Communicator	No equivalent statement	ERO positions have been standardized. See Enclosure 1 for detailed justification of standardized organization.
28.	**1.25 TSC** – Technical Support Center	No equivalent statement	Facility defined as part of Section H facility descriptions. (H.1)
29.	**1.26 Total Effective Dose Equivalent (TEDE**) is the sum of EDE and CEDE.	**Appendix A** TEDE is the sum of the Deep-Dose Equivalent (for external exposures) and the CEDE (for internal exposures).	Language standardized in Standard Plan.
30.	**1.27** Xcel Energy is the owner of the Monticello Nuclear Generating Plant.	**Section I: Introduction, Purpose** The Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy,	No change. Language standardized and clarified to better describe current corporate structure.
31.	**SECTION 2.0 SCOPE AND APPLICABILITY**	**Section I: Introduction**	

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
32.	In accordance with license conditions, 10 CFR Part 50, and NRC Regulatory guidance, the Northern States Power Company – Minnesota (NSPM) has developed and implemented an emergency response plan for the Monticello Nuclear Generating Plant (MNGP) and a joint off–site plan for the MNGP and the Prairie Island Nuclear Generating Plant. Xcel Energy's wholly owned subsidiary NSPM operates the Monticello Nuclear Generating Plant. As asset owner, Xcel Energy retains all owner obligations.	In accordance with license conditions, 10 CFR Part 50, and NRC Regulatory Guidance, the Standard Emergency Plan (SEP) provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to power plants operated by Xcel Energy, and plant employees. Xcel Energy operates the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP).	No change. Language standardized and clarified to better describe current corporate structure.
33.	In any emergency situation at Monticello, the initial response would be made by the site staff and, if needed, by local support agencies.	No equivalent statement	Section C of the Standard Plan provides the overall response capabilities and expected timeliness of the response efforts for company and offsite response should the plan be activated.
34.	It is expected that the initial response would have to extend for a period of hours, by which time the site staff would be augmented by other segments of the overall NSPM emergency response organization.	No equivalent statement	Section C of the Standard Plan provides the overall response capabilities and expected timeliness of the response efforts for company and offsite response should the plan be activated.
35.	Once all centers are activated and the emergency organization is at full strength, the scope of the plant staff response will be reduced to the immediate plant site activities. This plan covers the actions and responsibilities of the Monticello plant staff and the local off site support agencies.	No equivalent statement	Section C of the Standard Plan provides the overall response capabilities and expected timeliness of the response efforts for company and offsite response should the plan be activated.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
36.	The plan is directed toward the following areas:	**Section I: Introduction/Scope** Detailed procedures concerning the implementation of the SEP are in the Emergency Plan Implementing Procedures (EPIPs). The EPIPs address the functional areas and actions that implement the plan and serve as the interface between the Emergency Plan, plant operations, security, and radiological control programs. Xcel Energy also has procedures in place that implement onsite protective actions and personnel accountability during hostile action threats or events that are appropriate for plant and environmental conditions. These procedures are available for use at the plants. There are supporting and complementing emergency plans, including those of federal agencies, the states of Minnesota and Wisconsin, the Prairie Island Indian Community and risk counties.	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
37.	The plan is directed toward the following areas:	Xcel Energy Chief Nuclear Officer has overall responsibility for maintaining a state of readiness to implement this Plan for the protection of plant personnel, the general public, and property from hazards associated with nuclear power generation facilities operated by the company.	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
38.	**2.1** Organization and actions within the plant to control and limit the consequences of an accident.	See Scope description in Lines 36 and 37	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
39.	**2.2** Organization and actions controlling site and initial off-site activities in the event of an uncontrolled release of radioactive material. This includes notification of and coordination with required off-site support agencies.	See Scope description in Lines 36 and 37	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
40.	**2.3** Identifying and evaluating the consequences of accidents that may occur and affect the safety of public and plant personnel.	See Scope description in Lines 36 and 37	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
41.	**2.4** Describing the protective action levels and actions that are required to protect the public and plant personnel in the event of an accident.	See Scope description in Lines 36 and 37	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
42.	**2.5** Considerations necessary for the purposes of re-entry and recovery.	See Scope description in Lines 36 and 37	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
43.	**2.6** Arrangements required for medical support in the event of injury.	See Scope description in Lines 36 and 37	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
44.	**2.7** The training necessary to assure adequate response to emergencies.	See Scope description in Lines 36 and 37	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
45.	**2.8** Notification systems used to notify the public in the event of an incident involving or potential of involving an off-site release.	See Scope description in Lines 36 and 37	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
46.	The Emergency Plan is dependent upon the Emergency Plan Implementing Procedures for implementation. The procedures are the activating mechanism for the State Plan, which in turn activates the local government and service support agencies. Finally, the procedures reference standing plant operating, radiological control and security procedures in defining the plant's response to the spectrum of emergency situations.	See Scope description in Lines 36 and 37	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
47.	**SECTION 3.0 SUMMARY OF EMERGENCY PLAN**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
48.	Abnormal events, both realized and potential, requiring emergency preparedness response are classified into four classes of Emergency Action Levels. The four levels of emergency classes, in increasing order of severity are: (1) Notification of Unusual Event (2) Alert (3) Site Area Emergency (4) General Emergency	**Section D.1** Contains classification levels and descriptions. (not repeated due to bulk)	Organization of the plan was aligned to structure of NUREG-0654, Revision 2. Language moved without Change in practice or intent to Section D.
49.	Each class requires specific immediate actions on the part of the plant staff in order to protect the public, plant personnel and property. As the severity level of the emergency increases, so does the response of the off-site agencies, in order to protect the public.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Table is used to document specific expected actions for each level.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
50.	The lowest class (least severe) is the Notification of Unusual Event. This classification will be handled by plant personnel, with advisory notification to local and state authorities. The Alert Classification requires prompt notification of local and state authorities, which will place their various organizations in the standby mode. In both the Notification of Unusual Event and the Alert Classification, the plant staff is expected to restore the situation to normal without further or minimum involvement of off-site authorities. The two higher severity classes, the Site Area and the General Emergency, (the General Emergency being the most severe), require prompt notification of off-site authorities with immediate involvement of those organizations to assess the emergency situation and to implement the required protective actions for the general public.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Table is used to document specific expected actions for each level.
51.	**SECTION 4.0 EMERGENCY CLASSIFICATION SYSTEM**		
52.	Emergency situations are classified according to severity, taking into consideration potential as well as actual events in process. Monticello Nuclear Generating Plant has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an emergency action level has been exceeded.	**Section D.2** Xcel Energy has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded. The 15-minute time requirement to declare events will not be construed as a grace period to attempt to restore conditions to avoid declarations.	No change

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
53.	Upon identification of the appropriate emergency classification level the emergency condition will be promptly declared. The four standardized classifications are as follows: 1. Notification of Unusual Event (NUE) 2. Alert 3. Site Area Emergency (SAE) 4. General Emergency (GE)	**Section D.1** Contains classification levels and descriptions. (not repeated due to bulk)	Organization of the plan was aligned to structure of NUREG-0654, Revision 2. Language moved without Change in practice or intent to Section D.
54.	The rationale connecting the four action levels is to provide a mechanism for timely notification of events which could lead to significant consequences given subsequent operator error or equipment failure or which might be indicative of more serious conditions which are not yet fully realized. It should be noted that various events could require a graded scale of response. A minor incident could increase in severity and advance to the next class of emergency.	**Section D.2** Xcel Energy has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded. The 15-minute time requirement to declare events will not be construed as a grace period to attempt to restore conditions to avoid declarations.	Language standardized and aligned to provide specific commitment for timely notification.
55.	The process of assessing and classifying an event as a specific type of emergency requires a broad knowledge of integrated plant instrumentation and response to various transients. The various Initiating Conditions (IC) for each emergency class are specified in Annex A of this plan. Annex A also includes the detailed set of Emergency Action Levels (EAL) applicable to the Monticello Nuclear Generating Plant. The EALs are the plant–specific indications, conditions, or instrument readings that are utilized to classify emergency conditions at the plant and were developed using the EAL development methodology found in NEI 99–01, Revision 6.	**Section D.1** Xcel Energy has established and maintains a standard emergency classification and emergency action level scheme. EPLAN-04, Monticello Nuclear Generating Plant Emergency Action Levels EPLAN-05, Prairie Island Nuclear Generating Plant Emergency Action Levels	The Standard Plan standardizes the format for the Classification Process. Site Specific Plan documents contain the NEI 99-01 EAL scheme previously approved by the NRC for each site.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
56.	The ICs and EALs are grouped into the following symptom-based, event based, and barrier-based recognition categories. • R – Abnormal Rad Levels/Radiological Effluent • C – Cold Shutdown/Refueling System Malfunction • E – Independent Spent Fuel Storage Installations • F – Fission Product Barrier • H – Hazards and Other Conditions Affecting Plant Safety • S – System Malfunction	EPLAN-04, Monticello Nuclear Generating Plant Emergency Action Levels EPLAN-05, Prairie Island Nuclear Generating Plant Emergency Action Levels	Site Specific Plan documents contain the NEI 99-01 EAL scheme previously approved by the NRC for each site. The ICs and EALs are contained in those documents.
57.	Following is a brief description of each emergency classification and its associated response level.	No equivalent statement	Introduction statement not used in Standard Plan.
58.	**4.1 Notification of Unusual Event** Events are in process or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring off-site response or monitoring are expected unless further degradation of safety systems occurs. The purpose of this classification is to assure that the first step in future response has been carried out, to bring the operations staff to a state of readiness, and to provide systematic handling of unusual event information and decision-making.	**Section D.1** Unusual Event (UE) Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.	Language standardized in the proposed Plan without change in process or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
59.	**4.2 Alert** Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels. The purpose of this classification is to assure that emergency personnel are readily available to respond if the situation becomes more serious or to perform confirmatory radiation monitoring if required, and provide offsite authorities current information on plant status and parameters.	**Section D.1** Alert Events are in progress, or have occurred, which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life-threatening risk to site personnel or damage to site equipment because of hostile action. Any releases are expected to be small fractions of the EPA Protective Action Guideline exposure levels.	Language standardized in the proposed Plan without change in process or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
60.	**4.3 Site Area Emergency Events** are in process or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or HOSTILE ACTION that results in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) that prevent effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA Protective Action Guideline exposure levels beyond the site boundary. The purpose of the Site Area Emergency declaration is to assure that emergency response centers are staffed, to assure that monitoring teams are dispatched, to assure that personnel required for evacuation of near-site areas are at duty stations if the situation becomes more serious, to provide consultation with offsite authorities, and to provide updates to the public through government authorities.	**Section D.1** Site Area Emergency (SAE) Events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or hostile action that results in intentional damage or malicious acts; 1) toward site personnel or equipment that could lead to the likely failure of or; 2) that prevent effective access to, equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA PAG exposure levels beyond the site boundary.	Language standardized in the proposed Plan without change in process or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
61.	**4.4 General Emergency Events** are in process or have occurred which involve actual or IMMINENT substantial core degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels off-site for more than the immediate site area. The purpose of the General Emergency declaration is to initiate predetermined protective actions for the public, to provide continuous assessment of information from the licensee and offsite organizational measurements, to initiate additional measures as indicated by actual or potential releases, to provide consultation with offsite authorities, and to provide updates for the public through government authorities.	**Section D.1** General Emergency (GE) Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or hostile actions that result in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA PAG exposure levels offsite for more than the immediate site area.	Language standardized in the proposed Plan without change in process or intent.
62.	**SECTION 5.0 ORGANIZATIONAL CONTROL OF EMERGENCIES**		
63.	**5.1 Normal Site Organization**	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of the 'normal' organization to focus on the requirements for organization response to activation of the Plan as described in Section C.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
64.	**5.1.1 Site Management Organization** The normal site organization is comprised of the plant organization and several other fleet support organizations. Each organizational area has a report directly to the Site Vice President or provides on-site functional support to the Site Vice President with an indirect reporting responsibility to the Site Vice President. Responsibilities and authority of the various functional groups and individual positions are delineated in site procedures which also provide detailed organizational descriptions.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of the 'normal' organization to focus on the requirements for organization response to activation of the Plan as described in Section C.
65.	**5.1.2 Shift Organization**		
66.	**5.1.2.1 Operations** The Shift Manager holds a Senior Reactor Operator license and is the senior member of the Operations shift organization. The Shift Manager has the responsibility and authority to direct operating activities of the plant IAW applicable regulations and procedures. The Shift Manager maintains the broadest perspective of operational conditions affecting plant safety and serves as or provides oversight of the technical advisor to the Control Room Supervisor and Control Room operations crew.	**Section B.1.a** The requirements for on-shift operations staff, security force staff, fire brigade and first aid staff are controlled by site-specific Technical Specifications and other site-specific licensing and administrative documents. Positions from these departments are contained in the emergency plan only when assigned an EP function that is performed during an event.	NUREG-0654, Revision 2, formatting eliminates the description of the 'normal' organization to focus on the requirements for organization response to activation of the Plan as described in Section C.

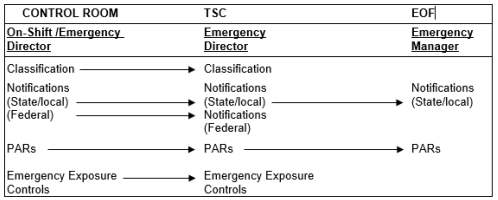
	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
67.	The Control Room Supervisor holds a Senior Reactor Operator license and reports to the Shift Manager. The Control Room Supervisor has the responsibility to supervise operating activities of the plant in accordance with applicable regulations and procedures under the direction of the Shift Manager. A third SRO is qualified to support the shift manager in evaluation of off normal conditions. Licensed Operators assigned to the Control Room perform plant manipulations and take direction from the Control Room Supervisor. Auxiliary Operators outside the Control Room manipulate plant equipment and generally take direction from the Lead Plant Equipment and Control Room Operator or the Control Room Supervisor.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of the 'normal' organization to focus on the requirements for organization response to activation of the Plan as described in Section C.
68.	**5.1.2.2 Fire Brigade** The plant Fire Brigade is staffed by qualified Operators, Chemistry and Radiation Protection Technicians. The Fire Brigade is maintained in accordance with FIREPREVENT (FIRE PREVENTION PRACTICES).	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of site functions controlled by other plant requirements, in this case the Fire Prevention to focus on EP functions.
69.	**5.1.2.3 Radiation Protection** Two Radiation Protection Technicians are assigned to each operating shift. The normal responsibilities of a shift Radiation Protection Technician are conducting routine and special radiological surveys, operation of plant Count Room equipment, access control and Radiation Work Permit preparation.	**Section B.1.a, Table B-1 Minimum On-Shift and Augmented Staffing**	The Standard Plan formatting revises staffing requirements into Table B-1. The task of on-shift dose assessment has been added as a responsibility of the RP Technician as an ancillary duty. The shift staffing analysis demonstrated that the addition of this task did not result in conflict of duties.
70.	**5.1.2.4 Chemistry**	No equivalent statement	Chemistry function is no longer included in NUREG-0654, Revision 2, as an EP

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
	One Chemistry Technician is assigned to each operating shift. The normal responsibilities of the shift Chemistry Technician are conducting routine and special chemistry sampling and analysis and operation of the plant Chemistry Lab.		function resulting in the deletion of this section.
71.	**5.1.2.5 Security (Shift Emergency Communicator)** Security personnel perform duties in accordance with the Security Plan. In addition, Security personnel on each shift are normally assigned the responsibility of primary Shift Emergency Communicator (SEC). As SEC, Security personnel perform emergency and non-emergency communications as directed by the Shift Manager.	**Section B.1.a** Shift Emergency Communicator • Notify the ERO as needed • Communicate required information per element E.3 to Offsite Response Organizations (ORO) until relieved	Language has been standardized between the three current plans and aligned to format. Detailed staffing analysis is contained in Enclosure 1 Section B of this submittal.
72.	If dedicated Security personnel are not available to perform this function, other SEC qualified personnel may also be assigned responsibility of primary SEC.	No equivalent statement	Standard Plan directs required staffing to implement EP functions. Statement is no longer required.
73.	**5.1.3 Minimum Shift Staffing** Minimum shift staffing SHALL be as indicated in Table 1, Minimum Shift Staffing and Capability For Additions For Nuclear Power Plant Emergencies.	**Section B.3** The Xcel Energy Minimum Staff Table B-1 includes on-shift and augmented positions as identified in NUREG-0654, Revision 2, Table B-1 as well as those positions required in the TSC, OSC and EOF for facility activation.	Language standardized between the three plans without change of intent.
74.	**5.1.4 Onshift Staffing Analysis** The Onshift Staffing Analysis provides the supporting documentation for developing the onshift staffing levels as indicated in Table 1, Minimum Shift Staffing and Capability for Additions for Nuclear Power.	**Section B.1.a** Site-specific on-shift staffing analysis reports are developed in accordance with 10 CFR 50 Appendix E.IV.A.9 and NEI 10-05. (EPLAN-08, EPLAN-09)	Language standardized between the three plans without change of intent.
75.	**5.2 Emergency Organization and Responsibilities**	**Section B, Emergency Response Organization**	

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
76.	Under emergency conditions the organization of the site staff is altered to simplify communications channels and make more efficient use of personnel resources (refer to Figure 13.1, Monticello Plant Emergency Organization). The Monticello Emergency Response Organization (ERO) consists of various groups which staff the site Emergency Response Facilities including the Technical Support Center, Operational Support Center and Emergency Operations Facility (or backup EOF if necessary). Functional responsibilities of the various groups are described in this section.	No equivalent statement	Paragraph eliminated from Standard Plan. Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
77.	A detailed description of individual position responsibilities and leadership designations for the various groups is contained in Emergency Plan Implementing Procedure A.2-001 (EMERGENCY ORGANIZATION).	**Section B.1.a** The ERO is composed of the following positions and assigned responsibilities:	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
78.	A detailed description of personnel assignments is found in Form 5790-001-01 (EMERGENCY RESPONSE ORGANIZATION).	**Section B.1.a** The ERO is composed of the following positions and assigned responsibilities:	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
79.	**5.2.1 Technical Support Center Emergency Organization** The Technical Support Center ERO consists of a Coordination and Direction Group and six subordinate groups. Each group is represented at the command table in the Technical Support Center. The TSC will be activated within 60 minutes of an Alert or higher declaration.	**Section B.1.a, Figure B-1, TSC Organization** **Section, H.1** The TSC is activated within 60 minutes following the declaration of an Alert or higher classification.	Language standardized for TSC activation. No change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
80.	When a transition from Emergency Operating Procedures (EOPs) to Severe Accident Management Guidelines (SAMGs) occurs, an Accident Management Team (AMT) is formed to utilize the SAMGs. The AMT is comprised of the following ERO positions; Operations Group Leader, Assistant Operations Group Leader, Engineering Coordinator, Nuclear Engineer, SPDS Operator, Trending Individual. AMT members are the Decision Maker and Evaluators.	No equivalent statement	Issuance by the NRC of the Beyond Design Basis rule now controls the site response once these conditions are met. Discussion has been eliminated in the Emergency Plan in alignment with NUREG-0654, Revision 2, formatting.
81.	Evaluators are responsible for assessing control parameters, plant status, system status and EOP/SAMG actions and develop potential strategies that may be utilized to mitigate an event.	No equivalent statement	Issuance by the NRC of the Beyond Design Basis rule now controls the site response once these conditions are met. Discussion has been eliminated in the Emergency Plan in alignment with NUREG-0654, Revision 2, formatting.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
82.	Functional responsibilities of the Emergency Director include: • Recommend off-site protective measures. This responsibility may not be delegated and is relinquished to the Emergency Manager when the EOF is activated. • Overall direction and control of the Technical Support Center personnel and activities. • Ensure 24 hour coverage of key Emergency Response Organization positions in the TSC and OSC and continuity of personnel and material resources. • Make decisions regarding plant emergency response facility habitability including on–site protective actions (including KI use), personnel monitoring and evacuations. • Approval of emergency radiation exposures in excess of normal limits. • Communications with utility and off-site Emergency Response Organizations. EOF assumes responsibility for communications with off-site agencies when activated.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Provide overall ERO command and control until relieved. • Evaluate plant conditions and approve Emergency Action Level (EAL) classifications until relieved. • Approve Protective Action Recommendations (PARs) until relieved. • Authorize personnel dose extensions until relieved. • Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs until relieved. • Direct radiation protection activities, including Field Monitoring Team (FMT) direction until relieved. • Provide relevant information to personnel communicating offsite PARs to OROs until relieved. • Direct and approve offsite emergency notifications to state and county authorities until relieved.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
83.	When the EOF is activated, the overall direction and control responsibility is transferred from the TSC Emergency Director to the Emergency Manager in the EOF.	**Section B.2** Command and Control Diagram See table below in Lines 82 and 83 Column 2.	Standard Plan revises the key functional areas of responsibility into a table showing clear assignment by facility and time.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
84.	The TSC Emergency Director retains authority and responsibility for decisions immediately affecting the plant including event classification, direction of plant emergency response and on-site protective measures including emergency exposure authorization.		Standard Plan revises the key functional areas of responsibility into a table showing clear assignment by facility and time.
85.	Responsibility for offsite functions of notification and protective action recommendations transfer from the TSC to the EOF Emergency Manager. The transition of command and control functions is depicted below.		Standard Plan revises the key functional areas of responsibility into a table showing clear assignment by facility and time.
86.	**5.2.1.2 Radiation Protection and Chemistry Groups**		
87.	The Radiation Protection and Chemistry Groups consists of the Radiological Emergency Coordinator (REC) and members of the Radiation Protection and Chemistry Groups. The REC reports to the Emergency Director and is staffed by Radiation Protection and Chemistry Manager designees. The group is divided into three sections: • Monitoring Section • Chemistry Section • Off-site Dose Projection	**Table B-1, Minimum On-Shift and Augmented Staff** **Figure B-1, TSC Organization** **Figure B-2, OSC Organization** **Figure B-3, EOF Organization**	Section B of the Plan maintains the ERO description and purposes. The concept of the specific groups is not used in the Standard Plan. The Plan staffing is aligned to the formatting of NUREG-0654, Revision 2, describing response by EP function. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
88.	The Radiological Emergency Coordinator is the group leader and responsible for coordination of all on-site Radiation Protection and Chemistry emergency response activities.	**Section B.1.a** Radiological Assessment Coordinator • Develop and recommend PARs • Communicate changes to plant radiological conditions • Provide oversight for facility habitability surveys	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
89.	The Monitoring Section consists of the Monitoring Section Leader, and members of the plant Radiation Protection/Chemistry staff and other NSPM personnel with demonstrated experience in radiation protection. Responsibilities of the Monitoring Section include on-site radiological surveys, in-plant surveys, personnel exposure control, access control, and initial off-site radiological monitoring.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
90.	The Chemistry Section consists of the Chemistry Section Leader and members of the plant Chemistry staff. Responsibilities of the Chemistry Section include chemistry sampling and analysis, plant and EOF Count Room operation, PASS sampling and core damage assessment, if necessary. Chemistry personnel also function as off-site Dose Projection Specialists.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
91.	Off-site dose projection is performed by a Dose Projection Specialist. The Dose Projection Specialist positions are staffed by qualified personnel trained in off-site dose projection. The Dose Projection Specialist responsibilities include off-site dose projections, monitoring current and forecast meteorological information and providing off-site dose projection results to the REC or RPSS.	**Section B.1.a** Dose Projection Specialist • Perform dose assessment	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
92.	**5.2.1.3 Support Group** The Support Group is staffed by members of the Performance Improvement, Supply Chain groups and others designated by site management. The Support Group Leader reports to the Emergency Director and is responsible for on-site logistics support, emergency document control, print and drawing retrieval, administrative services, emergency procurement and warehouse support. The Support Group Leader is also responsible to coordinate the establishment of 24-hour ERO shift schedules as requested by the Emergency Director.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
93.	**5.2.1.4 Operations Group** The Operations Group consists of the Operations Group Leader and all members of the Operations staff including the duty operating crew, off-duty Shift Managers, Control Room Supervisors and all Operators. The Operations Group Leader is staffed by Shift Operation Manager designees and includes off-duty Shift Managers and Control Room Supervisors that report to the Emergency Director. The Operations Group Leader serves as the primary link between the TSC and Control Room for the purpose of providing technical and operational advice and support to the duty Control Room operating staff.	**Section B.1.a** Operations Coordinator • Evaluate plant conditions and recommend emergency classifications	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
94.	When the TSC is staffed and a transition point from the EOPs to the SAMGs is reached, the duty Shift Manager and Operations Group Leader will make a joint decision to transition from the EOPs to the Severe Accident Management Guidelines (SAMGs). At this point, the Operations Group Leader would inform the TSC that they have relieved the duty Shift Manager as the Decision Maker.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
95.	The Decision Maker is designated to assess and select the strategies to be implemented. When using the SAMGs, the Operations Group Leader will act as the Decision Maker and directs actions as specified in the SAMGs. The Assistant Operations Group Leader is a member of the Accident Management Team (AMT). The Assistant Operations Group Leaders primary responsibility is to recommend actions to the Operations Group Leader based on the SAMGs.	No equivalent statement	Issuance by the NRC of the Beyond Design Basis rule now controls the site response once these conditions are met. Discussion has been eliminated in the Emergency Plan in alignment with NUREG-0654, Revision 2, formatting.
96.	The Assistant Operations Group Leader is an off–duty Shift Manager or Control Room Supervisor.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
97.	In addition, the Operations Group provides off-duty personnel to staff and support the Operational Support Center (OSC).	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
98.	**5.2.1.5 Engineering Group** The Engineering Group consists of the Engineering Group Leader and members of the Engineering and Maintain the Plant Groups.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

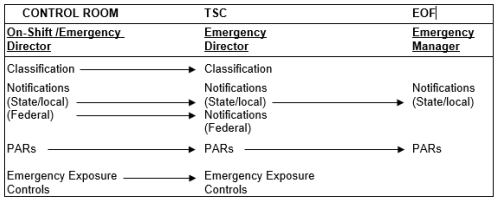
	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
99.	The Engineering Group Leader position is staffed by Engineering Manager Designees and reports to the Emergency Director.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
100.	The Engineering Group Leader is responsible for overall direction of Engineering Group activities and assessment.	**Section B.1.a** Engineering Coordinator • Direct and coordinate engineering resources	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
101.	The Engineering Coordinator reports to the Engineering Group Leader until the SAMGs are entered. When using the SAMGs the Engineering Coordinator becomes a member of the Accident Management Team (AMT) and reports to the Operations Group Leader.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
102.	Responsibilities of the Engineering Coordinator include engineering evaluation of the event, assessment of inoperable systems or system components, development of accident mitigation strategies and parameter trending and analysis.	**Section B.1.a** Core Thermal Engineer • Core damage assessment Mechanical Engineer • Provide engineering support and troubleshooting for mechanical systems Electrical Engineer • Provide engineering support and troubleshooting for electrical systems	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
103.	**5.2.1.6 Maintenance Group** The Maintenance Group consists of the Maintenance Group Leader and members of the Mechanical and Electrical Maintenance Groups including Instrument and Control and designated personnel capable of performing emergency tasks. The Maintenance Group Leader position is staffed by Maintenance Manager designees and reports to the Emergency Director.	**Section B.1.a** Maintenance Coordinator • Supporting the repair and corrective actions • Supporting Search and Rescue efforts	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
104.	The Maintenance Group Leader is responsible for the overall direction of corrective actions including damage control and emergency repairs to systems, components or equipment. The OSC Coordinator reports to the Maintenance Group Leader and is responsible for the coordination of emergency repair activities initiated out of the OSC.	**Section B.1.a** Maintenance Coordinator • Supporting the repair and corrective actions • Supporting Search and Rescue efforts	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
105.	**5.2.1.7 Security Group** The Security Group consists of the Security Group Leader, Security Lieutenant/SEC and members of the plant Security force. The Security Group Leader position is staffed by the Security Manager or designee and reports to the Emergency Director.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of site functions controlled by other plant requirements, in this case the Fire Prevention to focus on EP functions.
106.	The Security Group Leader is responsible for the direction and coordination of security emergency activities including personnel accountability, evacuation of on-site areas and site traffic control and access.	**Section B.1.a** Security Coordinator • Coordinate security response with Local Law Enforcement and Federal officials • Provide oversite for the Offsite Communicator	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
107.	The duty Shift Emergency Communicator reports to the Emergency Director (Shift Manager) and is responsible for making or assisting with initial off-site notification. The duty Shift Emergency Communicator may be a qualified SEC from other departments.	**Section B.1.a** Shift Emergency Communicator • Notify the ERO as needed • Communicate required information per element E.3 to Offsite Response Organizations (ORO) until relieved	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
108.	**5.2.1.8 Emergency Communications Group** The Communications Group consists of the Offsite Communicators and qualified Emergency Communicators from various site and fleet support groups. Designated personnel are qualified to staff emergency communicator positions in the TSC, OSC, EOF and Control Room. Responsibilities of the Emergency Communicators include emergency notifications to off-site authorities, transmission of Emergency Follow-up Messages and other required information to off-site authorities, intra-utility communications and communications links between site emergency response facilities.	**Section B.1.a** ENS Communicator • Communicate EAL and PARs to NRC until relieved • Activate / confirm activation of the Emergency response Data System (ERDS) • Perform notifications to the NRC as required by 10 CFR 50.72 Offsite Communicator • Transmit information to state/local agencies ERF Communicator(s) • Maintain communications and transmit key activities between the CR, TSC, OSC and EOF	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
109.	**5.2.2 Operational Support Center Emergency Organization**		
110.	The OSC Emergency Response Organization includes personnel from Maintenance, Operations, Radiation Protection and Chemistry. The OSC is activated within 60 minutes of an Alert or higher declaration.	**Section H.2** The OSC is activated within 60 minutes following the declaration of an Alert or higher classification. OSC activation at the Unusual Event emergency classification level is optional. **Figure B-2, OSC Organization, p. 25**	Language was standardized between the three Plans without change in commitment for timely staffing. See Enclosure 1 Section B for justification of OSC staffing.
111.	**5.2.2.1 Coordination and Direction** The OSC Coordinator is responsible for coordination of all OSC activities including dispatching repair teams, personnel accountability in the OSC and OSC habitability.	**Section B.1.a** OSC Coordinator • Coordinate OSC staffing and activities **Figure B-2, OSC Organization**	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
112.	The OSC Coordinator position is staffed by individuals with Maintenance or Operations experience and reports to the Maintenance Group Leader.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
113.	**5.2.2.2 Mechanical Maintenance** The Mechanical Maintenance Group consists of Machinists, Steamfitter – Welders, Riggers and Repairmen from the plant Maintenance Department, as well as designated personnel capable of performing emergency tasks. They are responsible for emergency repair activities under the direction of the OSC Coordinator.	**Section B.1.a** Maintenance Coordinators • Provide oversight for OSC activities related to mechanical, electrical and I&C work	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
114.	**5.2.2.3 Electrical Maintenance** The Electrical Maintenance Group consists of the Electrical Maintenance Coordinator and Station Electricians from the plant Maintenance Department, as well as designated personnel capable of performing emergency tasks. They are responsible for emergency repair activities under the direction of the OSC Coordinator.	**Section B.1.a, Figure B-2, OSC Organization**	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
115.	**5.2.2.4 Instrument & Control** The I&C Group consists of the I&C Maintenance Coordinator and I&C Specialists from the plant Maintenance Department, as well as designated personnel capable of performing emergency tasks. They are responsible for emergency repairs under the direction of the OSC Coordinator.	**Section B.1.a, Figure B-2, OSC Organization**	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
116.	**5.2.2.5 Radiation Protection** The Radiation Protection Group consists of the Radiation Protection Coordinator, Radiation Protection Technicians, Chemistry Technicians, and other NSPM personnel with radiation protection/chemistry experience and personnel designated and trained to perform on-site, out of plant and off site radiological monitoring surveys. Radiation protection responsibilities include: OSC RP support, staffing Main Access Control, in-plant emergency team support, in-plant and out-plant radiological surveys, Emergency Response Center habitability, off-site environmental monitoring, Assembly Point staffing and Fire Brigade support (as necessary).	**Section B.1.a, Figure B-2, OSC Organization**	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
117.	**5.2.2.6 Operations** The Operations Group consists of available non-duty Shift Managers, Control Room Supervisors, Operators and other personnel reporting to the Operations Manager. Their responsibilities include OSC operations support, in-plant emergency teams, augment the duty Control Room staff (as necessary) and Fire Brigade support (as necessary).	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
118.	**5.2.3 EOF Emergency Organization**		
119.	The EOF Emergency Organization consists of a Direction and Control Group and four subordinate groups. The EOF Emergency Organization is staffed by personnel from the NSPM organization and is activated within 90 minutes of an Alert or higher declaration.	**Section B.1 contains the EOF Organization.** Figures B-3 (EOF) and B-4 (JIC) contain specific organizations and staffing timeliness requirements.	Corporate Plan previously controlled EOF organization. Incorporation of the standard Plan brings the previous organization into the Standard Plan. See Enclosure 1 Section B for detailed staffing justification.

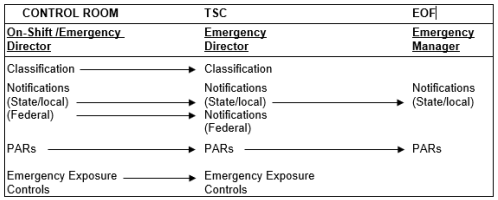
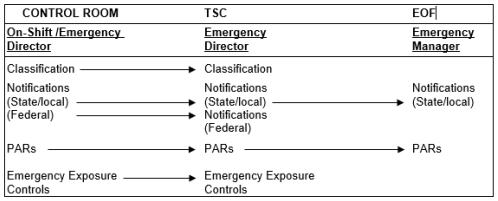
	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
120.	**5.2.3.1 Direction and Control** The Direction and Control Group consists of Site and Fleet Senior Management personnel. Designated members of this group staff the Emergency Manager position in the EOF. The Emergency Manager is responsible for overall direction and control of the utilities emergency response effort. The Emergency Manager relieves the Emergency Director of the following responsibilities:	**Section B.1.a** Emergency Manager • Provide overall event response and control • Approve notifications to state/local offsite agencies • Approve PARs	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
121.	• Off-site dose projections and coordination and direction of off-site radiological monitoring teams. • Communications with off-site authorities including Federal, State, and local authorities and Xcel Energy/NSPM executive management. • In addition, the Emergency Manager assumes the authority and responsibility to provide protective action recommendations to authorities responsible for implementing off-site emergency measures. Other responsibilities of the Emergency Manager include:	**Section B.2** 	Standard Plan revises the key functional areas of responsibility into a table showing clear assignment by facility and time.
122.	• Coordinate the emergency response efforts of other utility personnel assisting the site organization.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
123.	• Obtain and coordinate the services of outside consultants and vendors. • Advise Xcel Energy/NSPM executive management on matters related to emergency response efforts and	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

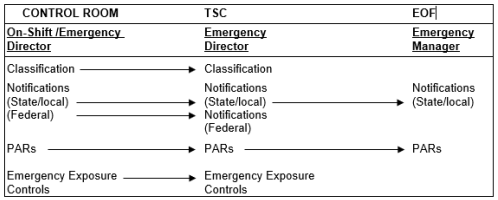
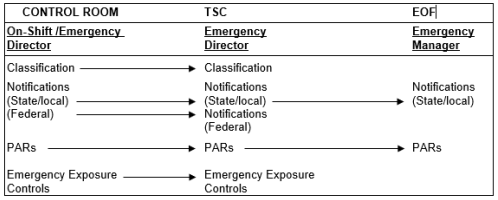
	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
	needed resources to support the effort.		
124.	**5.2.3.2 Technical Support Group** The EOF Technical Support Group consists of select personnel from various site and fleet groups. The Technical Support Supervisor is staffed by site and fleet personnel and reports to the Emergency Manager.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
125.	The Technical Support Group is responsible for trending critical parameters, engineering evaluation in support of the TSC Engineering Group, technical assessment and advising the Emergency Manager on technical matters related to the event.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
126.	**5.2.3.3 Radiation Protection Support Group** The Radiation Protection Support Group is staffed by Radiation Protection Technicians, Chemistry Technicians, and other NSPM personnel with radiation protection (chemistry) experience and personnel designated and trained to perform on-site, out of plant and off-site radiological monitoring surveys.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
127.	The Radiation Protection Support Supervisor position is staffed by NSPM personnel with demonstrated experience in radiation protection and reports to the Emergency Manager.	**Section B.1.a** **Figure B-4, EOF Organization** Radiological Assessment Coordinator (RAC) • Assess and communicate offsite radiological conditions • Provide oversite for dose assessments and projections • Develop and recommend PARs	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
128.	The Radiation Protection Support Group includes plant Chemistry personnel for off-site dose projection and EOF Count Room operation and designated personnel who function as sample couriers and drivers for off-site radiological monitoring teams. Radiation Protection Support Group responsibilities include:	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
129.	Direction and coordination of the utility off-site radiological monitoring teams. • Off-site dose projection. • EOF Count Room activation and operation. • EOF habitability, personnel monitoring and decontamination (as necessary).	**Section B.1.a** Field Monitoring Team (FMT) Monitor • Direct field monitoring teams for collection of dose rates and contamination levels Field Monitoring Team (FMT) • Conduct radiation surveys in areas at or beyond the Site Boundary • Collect environmental samples for future analysis **Figure B-4, EOF Organization,**	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
130.	Communications with State Emergency Operation Center personnel on matters related to dose projections and off site protective action recommendations.	**Section B.1.a** Radiological Assessment Coordinator (RAC) • Assess and communicate offsite radiological conditions • Provide oversite for dose assessments and projections • Develop and recommend PARs	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
131.	Staffing the Health Physics Network (HPN) and communications with the NRC (as necessary).	**Section B.1.a** HPN Communicator • Establish communications with the NRC on the Health Physics Network (HPN) bridge line as requested • Relate NRC requests for information on radiological conditions as needed	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

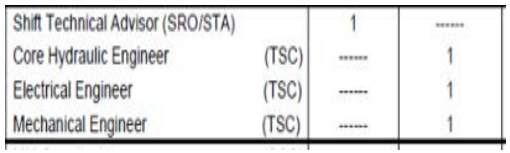
	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
132.	The Radiation Protection Support Supervisor advises the Emergency Manager on matters related to actual or potential radiological impact on the environment, off-site protective action recommendations, and EOF habitability.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
133.	**5.2.3.4 EOF General Staff, Logistics, and Support Group** The EOF general staff consists of the EOF Coordinator, off-site communicators, administrative and logistics support personnel.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
134.	The EOF Coordinator position is staffed by designated NSPM personnel and reports to the Emergency Manager. The EOF Coordinator is responsible for operation of the EOF and assists the Emergency Manager with administrative duties.	**Section B. 1.a.** EOF Manager • Supervise EOF staffing and activities	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
135.	The off-site communicators, EOF Security Coordinator, Agency Liaison and Administrative Staff report to the EOF Coordinator.	**Figure B-3, EOF Organization**	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
136.	The off-site communicators are responsible for communications with Federal, State and Local authorities as directed by the Emergency Manager.	**Section B.1.a** Offsite Communicator(s) • Transmit information to state/local agencies	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
137.	The Administrative Staff is responsible for emergency document control, recording and document distribution in the EOF.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
138.	The off-site Agency Liaison is responsible to serve as the initial interface with off-site (Non-MNGP/NSPM) Emergency Organizations (e.g., NRC Incident Response Team) responding to the EOF.	**Section B.1.a** Offsite Agency Liaison • Coordinate ERO and ORO activities	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

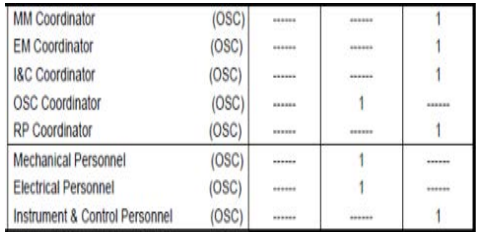
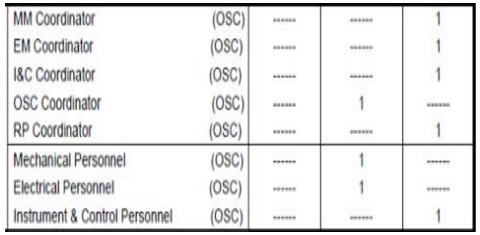
	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
139.	The EOF Security Group is staffed by personnel from the Site Security Group. The EOF Security Coordinator reports to the EOF Coordinator. Responsibilities of EOF Security include EOF access, dosimetry issuance to EOF personnel and Fitness-for-duty assessment (if required during off-hours activations).	**Section B.1.a** Security Coordinator • Coordinate security response with Local Law Enforcement and Federal officials • Provide oversite for the Offsite Communicator	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
140.	**5.3 Emergency Response Organization Augmentation**		
141.	The Emergency Response Organization augmentation goals are outlined in Table 1. The augmentation of each functional area and the methods used to accomplish ERO augmentation are described in this section.	**Table B-1, Minimum On-Shift and Augmented Staffing**	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
142.	**5.3.1 ERO Augmentation Description and Goals**		
143.	**5.3.1.1 Plant Operations and Operational Assessment** The duty Operations crew retains the responsibility for plant operation throughout an emergency situation. When in Severe Accident Management Guidelines (SAMGs) the duty operations staff implements the actions as directed by the SAMGs. Nonduty Operations personnel in the TSC and OSC will augment the duty Operations staff.	No equivalent statement	Issuance of the Beyond Design Basis rule removes the function from the emergency plan structure. The Standard Plan aligns with NUREG-0654, Revision 2, formatting focusing on Emergency Plan functions.
144.	The responsibilities of the non-duty Operations personnel include operational assessment, under the direction of the Emergency Director in the TSC, and support of emergency repair and corrective action efforts in the OSC including Fire Brigade support.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
145.	When the TSC is staffed and a transition point from the EOPs to the SAMGs is reached, the duty Shift Manager and Operations Group Leader will make a joint decision to transition from the EOPs to the SAMGs. At this point, the Operations Group Leader would inform the TSC that they have relieved the duty Shift Manager as the Decision Maker. The Decision Maker is designated to assess and select the strategies to be implemented.	No equivalent statement	Issuance of the Beyond Design Basis rule removes function from the emergency plan structure. The Standard Plan aligns with NUREG-0654, Revision 2, formatting focusing on Emergency Plan functions.
146.	When using the SAMGs, the Operations Group Leader will act as the Decision Maker and direct control room response as specified in the SAMGs. The Assistant Operations Group Leader is a member of the Accident Management Team (AMT).	No equivalent statement	Issuance of the Beyond Design Basis rule removes function from the emergency plan structure. The Standard Plan aligns with NUREG-0654, Revision 2, formatting focusing on Emergency Plan functions.
147.	**5.3.1.2 Emergency Direction and Control**	**Section B.2.a**	Issuance of the Beyond Design Basis rule removes function from the emergency plan structure. The Standard Plan aligns with NUREG-0654, Revision 2, formatting focusing on Emergency Plan functions.
148.	The duty Shift Manager initially assumes the duties and responsibilities of the Emergency Director until relieved by a designated TSC Emergency Director. Once relieved, the duty Shift Manager's primary focus returns to overall coordination of emergency response activities of the duty Operations crew.		Standard Plan revises the key functional areas of responsibility into a table showing clear assignment by facility and time.
149.	The TSC Emergency Director assumes overall responsibility for the utility emergency response activities until relieved of notification and protective action recommendation functions by the Emergency Manager in the EOF.		Standard Plan revises the key functional areas of responsibility into a table showing clear assignment by facility and time.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
150.	Once relieved of offsite functions, the TSC Emergency Director's primary focus is on site operation and overall direction of plant emergency response activities in plant emergency response facilities including the on-site Assembly Point.		Standard Plan revises the key functional areas of responsibility into a table showing clear assignment by facility and time.
151.	The Emergency Manager assumes overall authority and responsibility for the utility's emergency response activities from the Emergency Director and retains this authority until the event is terminated or the transition to recovery is complete.		Standard Plan revises the key functional areas of responsibility into a table showing clear assignment by facility and time.
152.	**5.3.1.3 Notification and Communications** The Shift Emergency Communicator (SEC) is responsible for the performance of initial emergency notifications to the State, counties, and other off-site and utility support organizations.	**Section B.1.a** Shift Emergency Communicator • Notify the ERO as needed. • Communicate required information per element E.3 to Offsite Response Organizations (ORO) until relieved.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
153.	A licensed operator or designee is responsible for performance of Federal notifications.	**Section B.1.a** ENS Communicator (SRO/RO) • Communicate EAL and PARs to NRC until relieved. • Activate or confirm activation of Emergency Response Data System (ERDS). • Perform notifications to the NRC as required by 10 CFR 50.72.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
154.	The duty SEC and licensed operator or designee will be augmented within 60 minutes with two additional Emergency Communicators in the TSC and within 90 minutes with two more Emergency Communicators at the EOF.	**Table B-1, Minimum On-Shift and Augmented Staffing**	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
155.	**5.3.1.4 Radiological Assessment and Protective Actions** The Shift Radiation Protection Technicians are responsible for initial radiological assessment including in-plant radiological surveys. The shift Chemistry Technician is responsible for initial chemistry sampling, sample analysis, and off-site dose projection operation if required.	**Section B.1.a** RP Technicians • Provide RP coverage for responders accessing potentially unknown radiological environments. • Provide in-plant surveys. • Control dosimetry and radiologically controlled area (RCA) access • Perform dose assessments and provide input regarding PARs to the SM/ED until relieved	Section B of the Plan maintains the ERO description and purposes and adds performance of on-shift dose assessment to this position. The shift staffing analysis demonstrated that the addition of this task did not result in conflict of duties. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
156.	The Shift Radiation Protection Technicians will be augmented by three additional Radiation Protection personnel within 60 minutes and three more Radiation Protection personnel within 90 minutes. The responsibilities of these additional Radiation Protection personnel include in-plant surveys, access control, and off-site radiological monitoring.	**Section B.1.a, Table B-1, Minimum On-Shift and Augmented Staffing**	Section B of the Plan maintains the ERO description and purposes and adds performance of on-shift dose assessment to this position. The shift staffing analysis demonstrated that the addition of this task did not result in conflict of duties. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
157.	In addition, a qualified Radiological Emergency Coordinator (REC) will augment the shift RP staff within 60 minutes.	**Section B.1.a, Table B-1, Minimum On-Shift and Augmented Staffing**	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
158.	The REC is responsible for overall coordination of the Radiation Protection and Chemistry Group's emergency response activities.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
159.	A qualified Radiation Protection Support Supervisor will be augmented within 90 minutes. The RPSS is responsible for dose assessment in the EOF.	**Section B.1.a** Radiological Assessment Coordinator (RAC) • Assess and communicate offsite radiological conditions. • Provide oversite for dose assessments and projections. • Develop and recommend PARs. **Table B-1, Minimum On-Shift and Augmented Staffing**	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
160.	The Shift Chemistry Technician will be augmented with one additional Chemist within 60 minutes.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
161.	**5.3.1.5 Engineering and Technical Support** Technical support for the shift Operations staff is initially provided by the duty Shift Manager or Shift Technical Advisor (when staffed separately on-shift). The plant Engineering and Operations staff will provide additional technical support personnel, knowledgeable in the areas of nuclear core/thermal hydraulics, electrical, and mechanical engineering. Augmentation in this area includes the addition of the core/thermal hydraulics position and two more members of the TSC Engineering Staff within 60 minutes. The TSC Engineering Staff is responsible to provide technical support to the Control Room staff under the direction of the Emergency Director.	**Table B-1, Minimum On-Shift and Augmented Staffing**  Shift Technical Advisor (SRO/STA) 1 ------ Core Hydraulic Engineer (TSC) ------ 1 Electrical Engineer (TSC) ------ 1 Mechanical Engineer (TSC) ------ 1	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
162.	Specific individuals from the TSC Engineering Staff are also members of an Accident Management Team (AMT). They will evaluate parameters used within the SAMGs.	No equivalent statement	Issuance of the Beyond Design Basis rule removes function from the emergency plan structure. The Standard Plan aligns with NUREG-0654, Revision 2, formatting focusing on Emergency Plan functions.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
163.	**.5.3.1.6 Repair and Corrective Actions** The duty Operations crew is initially responsible for any emergency repair and corrective actions that may be immediately required prior to ERO augmentation. After augmentation, repair and corrective actions are the responsibility of the Maintenance Group under the direction of the Emergency Director.	No equivalent statement	The robust nature of the ECCS System provide reliance on critical safety response during the early phases of the emergency condition prior to ERO Augmentation. See Enclosures 1, 2 and 3 for discussion on crediting of ECCS for performance of maintenance activities during the first 60 minutes after an event. The repair and corrective actions are managed as described in the ERO organization in Table B-1, On-shift Staffing and Augmentation, Figure B-1, TSC Organization, and Figure B-2, OSC Organization. Enclosure 1 Section B provides detailed justification of ERO staffing.
164.	The Maintenance Group consists of mechanical and electrical maintenance personnel including instrument and control technicians, as well as designated personnel capable of performing emergency tasks. Personnel from these groups report to the OSC where they are assigned corrective action tasks by the OSC Coordinator.	**Figure B-2, OSC Organization**  MM Coordinator (OSC) ------ ------ 1 EM Coordinator (OSC) ------ ------ 1 I&C Coordinator (OSC) ------ ------ 1 OSC Coordinator (OSC) ------ 1 ------ RP Coordinator (OSC) ------ ------ 1 Mechanical Personnel (OSC) ------ 1 ------ Electrical Personnel (OSC) ------ 1 ------ Instrument & Control Personnel (OSC) ------ ------ 1	NUREG-0654, Revision 2, formatting provides for tabular description of augmented maintenance response to an event. Individual responsibilities for ERO positions responding for the Repair and Corrective Actions function are provided by position specific list in Section B.1.a of the Standard Plan.
165.	Augmentation in the maintenance area includes the addition of one mechanical maintenance and one electrical maintenance person within 60 minutes and one I&C Group member within 90 minutes.	**Table B-1, Minimum On-Shift and Augmented Staffing**  MM Coordinator (OSC) ------ ------ 1 EM Coordinator (OSC) ------ ------ 1 I&C Coordinator (OSC) ------ ------ 1 OSC Coordinator (OSC) ------ 1 ------ RP Coordinator (OSC) ------ ------ 1 Mechanical Personnel (OSC) ------ 1 ------ Electrical Personnel (OSC) ------ 1 ------ Instrument & Control Personnel (OSC) ------ ------ 1	NUREG-0654, Revision 2, formatting provides for tabular description of augmented maintenance response to an event. Individual responsibilities for ERO positions responding for the Repair and Corrective Actions function are provided by position specific list in Section B.1.a of the Standard Plan.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
166.	**5.3.1.7 Firefighting** A shift fire brigade trained and equipped for fire fighting ensures adequate manual fire fighting capability for all areas of the plant containing structures, systems or components important to safety.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of site functions controlled by other plant requirements, in this case the Fire Protection Plan to focus on EP functions.
167.	Firefighting is the responsibility of the shift Fire Brigade. The shift Fire Brigade may be augmented by non-duty, Fire Brigade qualified, personnel available from the OSC. Additional support for the Fire Brigade is also available from the local Fire Departments upon request.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of site functions controlled by other plant requirements, in this case the Fire Protection Plan to focus on EP functions.
168.	**5.3.1.8 Rescue Operations and First Aid** The shift Fire Brigade is initially responsible for any immediate search and rescue operations or medical emergency response that may be required. After ERO augmentation, additional support for search and rescue and medical emergency response is available from the OSC staff under the direction of the OSC Coordinator.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of site functions controlled by other plant requirements to focus on EP functions.
169.	**5.3.1.9 Site Access Control, Accountability and Security** Site access, personnel accountability, coordination of evacuees and on-site traffic control are the responsibilities of the site Security Group. Augmentation of the on-duty, shift Security Force will be as directed by the Emergency Director and Security Group Leader.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of site functions controlled by other plant requirements, in this case the Site Security Plan to focus on EP functions.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
170.	**5.3.1.10 Administrative and Logistics Support** The Support Group is responsible for administrative support, document control and logistics in the on-site emergency response facilities.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
171.	**5.3.1.11 Environmental Monitoring Support** The site Radiation Protection/Chemistry Group is responsible to coordinate post-accident environs monitoring with the REMP contractor.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
172.	**5.3.2 Augmentation Methods** In order to ensure the goals of Table 1 (Minimum Shift Staffing and Capability for Additions for Nuclear Power Plant Emergencies) can be achieved, two methods have been developed for the notification of site emergency response personnel. The methods include an Emergency Response Organization (ERO) Pager Network and automatic callout system for select site groups such as Business Support, Operations, Maintenance, Radiation Protection, and Chemistry.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	Language standardized in Plan submittal without change in intent.
173.	The ERO Pager Network consists of a commercial pager system which provides coverage to an area of approximately 75 mile radius of Minneapolis. This area includes both the Monticello and Prairie Island nuclear sites.	No equivalent statement	Standard Plan retains the commitment to augment the ERO in a timely manner. Specifics of the system operation are transferred to procedural level to permit flexibility as new technologies emerge.
174.	The system may be accessed via commercial telephone and has primary and backup telephone numbers. Designated ERO personnel carry ERO pagers. This group includes:	No equivalent statement	Standard Plan retains the commitment to augment the ERO in a timely manner. Specifics of the system operation are transferred to procedural level to permit flexibility as new technologies emerge.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
175.	Emergency Directors TSC Group Leaders TSC Engineering Staff Emergency Communicators • Radiation Protection/Chemistry personnel	No equivalent statement	The Standard Plan retains the commitment to activate the ERO in a timely manner as described in the Figures B-1 through B-4. Sub-lists in this section are no longer required.
176.	Operations Shift Managers • Maintenance Supervision and Engineers • Support Group personnel • Emergency Managers • EOF Technical Engineering personnel • EOF Radiation Protection Support personnel	No equivalent statement	The Standard Plan retains the commitment to activate the ERO in a timely manner as described in the Figures B-1 through B-4. Sub-lists in this section are no longer required.
177.	Each pager in the network may be activated individually and all pagers in the network may be activated by one telephone (group) call.	No equivalent statement	Standard Plan retains the commitment to augment the ERO in a timely manner. Specifics of the system operation are transferred to procedural level to permit flexibility as new technologies emerge.
178.	To supplement the Pager Network, an automated callout system is utilized for site groups, including Operations, Maintenance, Support Group, Radiation Protection/Chemistry. The ERO roster utilized by the automated callout system is reviewed and updated quarterly.	No equivalent statement	Standard Plan retains the commitment to augment the ERO in a timely manner. Specifics of the system operation are transferred to procedural level to permit flexibility as new technologies emerge.
179.	Whether contacted by pager or other means, ERO personnel are instructed to respond immediately to the event.	No equivalent statement	Standard Plan retains the commitment to augment the ERO in a timely manner. Specifics of the system operation are transferred to procedural level to permit flexibility as new technologies emerge.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
180.	If an emergency has been declared based on a security event or security threat, onsite MNGP ERO personnel may be instructed to "duck and cover" until the threat has passed or, if safe, report to an alternate near site location to standby for activation of their respective facility. ERO members who are off-site will be instructed to report to the EOF. They will not be instructed to staff the affected facilities until it is safe to do so.	**Section H.4** An Alternative Emergency Facility for staging of ERO personnel has been designated for each Xcel Energy nuclear site and serves as a location for TSC and OSC personnel should those facilities become uninhabitable or in the cases where the facilities cannot be accessed such as a hostile action or natural disaster	Standard Plan retains the commitment for Alternative Emergency Facilities should onsite facilities be unsafe to staff. Specific protective measures are now addressed at the procedural level.
181.	**5.4 Augmentation of On-Site Emergency Organization**		
182.	**5.4.1 Licensee Headquarters Support**		
183.	This augmentation capability is completely described in the Off–site Nuclear Emergency Plan. The purpose of this capability is to support the plant and EOF in as many areas as is practical. Such areas include: Government Agency Interface, Logistics Support, Technical Analysis, News Media Interface, Xcel Energy and NSPM Executive Management Interface.	**Figure B-3, EOF Organization** **Figure B-4, JIC Organization**	Standard Plan incorporates the previous Off-site Nuclear Emergency plan. Figures identify responders and response commitments.
184.	**5.4.2 Local Support Services**		
185.	**5.4.2.1 Monticello Fire Department**		
186.	The Monticello Fire Department will provide fire and rescue assistance upon request in the event of a fire at the plant and Hostile Action Based (HAB) event.	**Monticello Annex Section A.4** Letters of Agreement	Specific description of support services including Hostile Action Based support is included in the Site-Specific Letters of Agreement.
187.	The Monticello Fire Department will be the lead fire agency for all emergencies in the City of Monticello. For a HAB event, the fire department will deploy a representative to the Incident Command Post dependent upon type, location, and scope of the incident, once scene safety is established.	No equivalent statement	Specific description of support services including Hostile Action Based support is included in the Site-Specific Letters of Agreement.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
188.	The MNGP Fire Brigade Leader will work with the Fire Department Leader to provide local coordination of fire fighting and non-fire fighting activities.	No equivalent statement	Specific description of support services including Hostile Action Based support is included in the Site-Specific Letters of Agreement.
189.	Non-fire fighting tasks may include actions such as spraying water to contain radiological releases or directing water to plant locations for refilling/cooling purposes.	No equivalent statement	Specific description of support services including Hostile Action Based support is included in the Site-Specific Letters of Agreement.
190.	In all cases, such operations may begin only when the radiological and security threats are mitigated to insure the safety of both plant personnel and fire fighters.	No equivalent statement	Specific description of support services including Hostile Action Based support is included in the Site-Specific Letters of Agreement.
191.	The City of Monticello has agreements in place to call upon resources of other agencies to assist in the response to a HAB event. The Monticello Fire Department will coordinate with other local fire departments to the extent necessary and consistent with the plans.	**Monticello Annex Section A.4** Site specific Letters of Agreement (LOAs) are maintained by Xcel Energy with the following organizations: • City of Monticello	Specific description of support services including Hostile Action Based support is included in the Site-Specific Letters of Agreement.
192.	If the fire department requires assistance to respond to an event at MNGP, including an HAB event, the Monticello Fire Department will be supplemented by resources available pursuant to the North Suburban Mutual Aid Agreement and the Minnesota Fire and Rescue Mutual Aid Plan.	No equivalent statement	Specific description of support services including Hostile Action Based support is included in the Site-Specific Letters of Agreement.
193.	**5.4.2.2 CentraCare Health Monticello**		
194.	CentraCare Health Monticello, also referred to as “local hospital”, serves as the principal off-site medical facility for initial treatment of radiation complicated injury or illness. In addition, St. Cloud Hospital (CentraCare) and North Memorial Hospital (in Robbinsdale) have been designated as the definitive care center for injuries or illness that require	**Section L.2.b** Arrangements have been made with local hospitals for the medical treatment of contaminated injured personnel. **Monticello Annex, Section A.4** Site specific Letters of Agreement (LOAs) are maintained by Xcel Energy with the following organizations: • CentraCare – Monticello (CC-M)	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision2, without change to practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
	services/facilities that the local hospital is unable to provide. Emergency procedures have been established at both hospitals and training of hospital personnel is accomplished periodically.	**Section C.2** LOAs common to both sites include; • North Memorial Health Care	
195.	A complete description of local medical support services may be found in the Off-site Nuclear Emergency Plan.	No equivalent statement	The Standard Plan incorporates the previous Off-site Emergency Plan. Statement no longer required.
196.	**5.4.2.3 Burlington Northern and Santa Fe Railway**		
197.	The Burlington Northern and Santa Fe Railway Dispatcher will stop and re-route trains away from the plant site, if necessary.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
198.	**5.4.2.4 Ambulance Service**		
199.	There are two ambulance services that are available to provide service to the Monticello Nuclear Generating Plant. CentraCare Health ambulance service will provide ambulatory services and be the lead Emergency Medical Service (EMS) agency for all emergencies at MNGP. For a Hostile Action Based (HAB) event, CentraCare Health ambulance service will deploy a representative to the Incident Command Post dependent upon type, location, and scope of the incident, once scene safety is established. The CentraCare Health representative will work under the direction and control of the Incident Commander, which shall be either the Wright County Sheriff's Office or Monticello Fire Department, dependent on the type of incident.	**Monticello Annex Section A.4** Site specific Letters of Agreement (LOAs) are maintained by Xcel Energy with the following organizations • CentraCare – Monticello (CC-M) • Sherburne County Sheriff's Department and Emergency Services Division • Wright County	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2 without change to practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
200.	CentraCare Health ambulance service may utilize mutual aid to supplement their response. This mutual aid includes the relationships with St. Cloud Hospital (CentraCare) and North Memorial Medical Center. If the response to an emergency, including a HAB event, requires additional resources, CentraCare Health will engage the resources of its affiliate, St. Cloud Hospital (CentraCare) as needed and as available.	**Section L.2.b** Arrangements have been made with local hospitals for the medical treatment of contaminated injured personnel. **Monticello Annex, Section A.4** Site specific Letters of Agreement (LOAs) are maintained by Xcel Energy with the following organizations: • CentraCare – Monticello (CC-M) **Section C.2** LOAs common to both sites include; • North Memorial Health Care	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
201.	A complete description of response capabilities, organizational resources, activation plans, designations of emergency operations centers and letters of agreement for the organizations mentioned above are available in the Minnesota Emergency Operations Plan.	No equivalent statement	Standard Plan contains the support agencies required to implement the Plan. Reference to State Plan provides no benefit to the site plan.
202.	**5.4.2.5 Local Law Enforcement**		
203.	For a HAB event, Wright County Sheriff's Office will set up an Incident Command Post (ICP) near the site. The pre designated ICP location(s) have been identified; however, selection will depend on the incident. The Wright County Sheriff's Office maintains the list of potential ICP sites and will be responsible for designating the site during a response and notifying the other agencies responding to the location. The Incident Command Post should be responsible for tracking resources and personnel at or near the site.	**Monticello Annex, Section A.4** Site specific Letters of Agreement (LOAs) are maintained by Xcel Energy with the following organizations: • Wright County	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
204.	Unified Command will be established and includes the Wright and Sherburne Counties, state, federal and utility personnel. For a HAB event, communication will be established between the Incident Commander and plant security and operations as soon as possible	No equivalent statement	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
205.	.The Wright County Sheriff's Office Tactical Response Team will be the lead tactical response operations group coordinator and coordinate the tactical law enforcement response with Command.	No equivalent statement	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
206.	If the response to an emergency, including a HAB event, requires additional resources, Wright County and the Sheriff have agreements in place to call upon the resources of neighboring law enforcement and emergency response service providers to assist.	No equivalent statement	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
207.	Wright County Sheriff's Office may request tactical team resources as needed from: Minnesota State Patrol Special Response Team, Sherburne County ERT, and FBI SWAT	No equivalent statement	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
208.	The initial hostile action response goals are: Maintain vital plant systems to prevent a release of radioactive materials, protection of on-site workforce, neutralizing the adversaries and restoring plant operating conditions.	No equivalent statement	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
209.	Law enforcement tactical operational priorities include: Securing a perimeter around the site, immediate containment of vital areas,	No equivalent statement	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
210.	sweep and securing of vital areas, safe movement of critical workers on the site, neutralizing adversaries, protection/evacuation of the on-site workforce, sweep of protected area and owner controlled area.	No equivalent statement	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
211.	Sherburne County will support the ICP with a Sherburne County Sheriff's Representative. If the response to an emergency, including a HAB event, requires additional resources, Sherburne County Sheriff's Department and Sherburne County Emergency Services have agreements in place to call upon the resources of neighboring law enforcement and emergency response service providers to assist.	No equivalent statement	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
212.	**5.5 Coordination with Participating Government Agencies**		
213.	Appropriate State and Local government emergency plans have been developed in support of the Monticello emergency preparedness effort. Figure 13.2, Interface Between Functional Areas of Emergency Activity, shows the interface relationships between functional areas of emergency activity.	**Figure B.4-1**	No change
214.	Figure 13.3, Interface Between Functional Areas of Emergency Activity During Hostile Action Based Events, illustrates the interface relationships between on-site and off-site functional areas of emergency response during events requiring use of an off-site Incident Command Post.	No equivalent statement	The HAB support for Hostile Action Based events is laid out in the respective Letters of Agreement. They establish the interaction between the site and offsite incident command. Function of the offsite response will be managed by the ICP and not the site.
215.	**5.5.1 Minnesota Department of Public Safety**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
216.	The Minnesota Department of Public Safety has the responsibility for notification and coordination of state agencies in the event of a major emergency at Monticello. In the event of an emergency situation at the plant, the State Emergency Operations Center is activated and the Minnesota Duty Officer will immediately call the Department of Health, Governor's Office, and other state agencies with emergency assignments to coordinate the implementation of any emergency procedures. The state agencies responsible for emergency procedures have established a system of 24-hour communications.	**Section A.1.a** Department of Public Safety The Minnesota (MN) Department of Public Safety has the responsibility for notification and coordination of MN state agencies in the event of a major emergency at Monticello and Prairie Island. When the State Emergency Operations Center (SEOC) is activated, communications between departments are initiated in order to coordinate procedure implementation. The state agencies responsible for implementing procedures have established a system of 24-hour communications.	Language has been standardized between the three prior plans without change in practice or intent.
217.	The state agencies and local government agencies are responsible for protecting the general public and providing logistical support such as food, temporary quarters, water, and sanitary facilities in the event that evacuation and isolation is required.	**Section A.1.a** The state agencies and local government agencies are responsible for protecting the general public and providing logistical support such as food, temporary quarters, water, and sanitary facilities if evacuation and isolation is required.	No change.
218.	**5.5.2 Minnesota Health Department**		
219.	The Minnesota Department of Health (MDH) is responsible for providing radiological expertise in the State Emergency Operations Center in conjunction with the Department of Public Safety.	**Section A.1.a** The Minnesota Department of Health (MDH) is responsible for providing radiological expertise in the State Emergency Operations Center in conjunction with the Department of Public Safety.	No change
220.	The Minnesota Department of Health will interpret data and participate in recommending protective actions to the Governor's Authorized Representative.	**Section A.1.a** The Minnesota Department of Health will interpret data and participate in recommending protective actions to the Governor's Authorized Representative	No change
221.	**5.5.3 Wright County Sheriff**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
222.	In the event of an accident the Sheriff of Wright County will notify all necessary civil support groups in Wright County. The sheriff or designee is also responsible for protection of the general public and can provide personnel and equipment for evacuation, relocation and isolation of affected areas.	**Section A.1.a** Counties within the sites' plume exposure EPZ maintain emergency plans that address the following primary response aspects: • Notification of their own personnel and other agencies local law enforcement, fire & rescue, and the Red Cross. • Traffic control • Notification or warning of persons in affected areas. • Evacuation out of the affected area, and provisions for shelter, food, accommodations, communications, medical care, etc. • Provide support to other counties, Xcel Energy, state and federal agencies	The language has been standardized between the three prior plans without change to practice or intent.
223.	**5.5.4 Monticello Radiological Emergency Preparedness**		
224.	The Monticello Radiological Emergency Preparedness has the responsibility for coordination of city populace in the event of a major emergency that affects the city of Monticello.	**Monticello Annex Section A.4** Site specific Letters of Agreement (LOAs) are maintained by Xcel Energy with the following organizations: • City of Monticello	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
225.	**5.5.5 U.S. Department of Energy**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
226.	Protection for the general public is provided through the Nuclear / Radiological Incident Annex of the National Response Framework. Under this plan, individual DOE officers are assigned geographic responsibilities for incidents occurring in their region. Their immediate objective is to rapidly dispatch a team of specialists to the incident site and assist the state in evaluating the hazard. The DOE will then provide the materials and equipment to counteract and control any acute hazard, and establish communications with local authorities.	**Section A.1.a** Department of Energy (DOE)/Radiation Emergency Assistance Center/Training Site (REAC/TS) Support The DOE provides radiological assistance on request though the REAC/TS and has radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. Following a radiological incident, DOE operates as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP)	The language has been standardized between the three prior plans without change to practice or intent. Statement of function is contained in the more general description of DOE function in the emergency response role
227.	**5.5.6 Sherburne County Sheriff**		
228.	In the event of an accident, the Sheriff of Sherburne County will notify all necessary civil support groups in Sherburne County. The sheriff or designee is also responsible for protection of the general public and can provide personnel and equipment for evacuation, relocation and isolation of affected areas.	**Section A.1.a** Counties within the sites' plume exposure EPZ maintain emergency plans that address the following primary response aspects: • Notification of their own personnel and other agencies such as local law enforcement, fire & rescue, and the Red Cross. • Traffic control • Notification or warning of persons in affected areas. • Evacuation out of the affected area, and provisions for shelter, food, accommodations, communications, medical care, etc. • Provide support to other counties, Xcel Energy, state and federal agencies.	The language has been standardized between the three prior plans without change to practice or intent.
229.	**5.5.7 Minnesota State Patrol**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
230.	The State Patrol may assist with the protection of the general public by providing personnel and equipment to re-route traffic in the event of a general emergency. Plans have been made for re-routing federal and state highways. Signs and equipment required for re-routing will be stored in the areas where they would be needed to facilitate highway closings.	No equivalent statement	State Agencies will function under the auspices of the State Plan and direction of State officials. Statement in the Xcel Energy Plan is not required.
231.	**5.5.8 Minnesota Department of Transportation**		
232.	Assist the State Patrol in blocking and re-routing traffic around the plant site. The Minnesota Department of Transportation has the necessary personnel, vehicles, signals, and barriers for establishing and maintaining detour routes.	No equivalent statement	State Agencies will function under the auspices of the State Plan and direction of State officials. Statement in the Xcel Energy Plan is not required.
233.	**5.5.9 City of Minneapolis Water Department**		
234.	The Water Department can shut off water intakes, if necessary.	**Section E.3** In conjunction with state and county authorities, Xcel Energy nuclear sites have established the content of the initial and follow-up notification message to be used during an emergency. Initial notification will include the following: • Site name • ECL • Release status • PAR, if applicable	The standard plan retains the licensee responsibility to notify ORO's of a radioactive release. NUREG-0654, Revision 2, element I.2 assigns the responsibility for the assessment of liquid releases to the ORO's. Actions taken following that assessment will be driven by offsite plans/procedures rather than the Standard Plan.
235.	**5.5.10 City of St. Paul Water Department**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
236.	The Water Department can shut off water intakes, if necessary.	**Section E.3** In conjunction with state and county authorities, Xcel Energy nuclear sites have established the content of the initial and follow-up notification message to be used during an emergency. Initial notification will include the following: • Site name • ECL • Release status • PAR, if applicable	The standard plan retains the licensee responsibility to notify ORO's of a radioactive release. NUREG-0654, Revision 2, element I.2 assigns the responsibility for the assessment of liquid releases to the ORO's. Actions taken following that assessment will be driven by offsite plans/procedures rather than the Standard Plan.
237.	A complete description of response capabilities, organizational resources, activation plans, designations of emergency operations centers and letters of agreement for the organizations mentioned above are available in the Minnesota Emergency Operations Plan.	No equivalent statement	Location of offsite information is outside the format of NUREG-0654, Revision 2, and not needed for the implementation of the Xcel Energy Plan.
238.	**5.6 Coordination with Other Participating Agencies**		
239.	**5.6.1 Institute of Nuclear Power Operations (INPO)**		
240.	INPO will coordinate requests from other utility INPO members and participants. They will notify NEI and EPRI of events, maintain an emergency resource capability and information on industry assistance capabilities, coordinate the delivery of persons and materials under its Nuclear Power Plant and Transportation Agreements, and provide member communications to facilitate the flow of technical information about the emergency.	**Section C.2** LOAs common to both sites include; • Institute of Nuclear Power Operations (INPO)	Language standardized between the three plans without change in practice or intent.
241.	**5.6.2 Pooled Equipment Inventory Company (PEICo)**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
242.	Southern Nuclear Services, llC ("SNS"), as agent for Pooled Equipment Inventory Company (PEICo) will support the Monticello emergency preparedness effort for withdrawal of PIM Pass Cask D24AElOIAOOl & A002.	**Section B.5** Pooled Equipment Inventory Company (PEICo) Contracts exist for the withdrawal of PIM PAS-1Casks for emergency response.	Language standardized between the three plans without change in practice or intent.
243.	The emergency contact list of the PIM Program Manager's Organization is provided in the LOA in the event there is a need to withdraw the subject equipment.	No equivalent statement	Language standardized between the three plans without change in practice or intent.
244.	**SECTION 6.0 EMERGENCY MEASURES**		
245.	**6.1 Summary of Responses**	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent.
246.	For each of the four emergency classifications discussed in Section 4.0 certain generic emergency response actions are required to be taken by the site Emergency Response Organization. These generic emergency response actions are in addition to those actions specific to the type of emergency. This section summarizes the generic emergency response actions.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent.
247.	**6.1.1 Notification of Unusual Event**	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent.
248.	**6.1.1.1** Promptly inform State and Local off-site authorities of the nature of the emergency condition.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
249.	**6.1.1.2** Inform the NRC of the Unusual Event.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
250.	**6.1.1.3** Augment on-shift resources as necessary.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
251.	**6.1.1.4** Assess and respond to the off-normal condition.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
252.	**6.1.1.5** Terminate the Unusual Event with notification to the State and Local off-site authorities and the NRC. OR	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
253.	**6.1.1.6** Escalate to a more severe emergency class.	No equivalent statement	Escalation is driven by the progression EALs as designed in the NEI 99-01 system. Statement is not required.
254.	**6.1.2 Alert**	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent.
255.	**6.1.2.1** Promptly inform the State and Local off-site authorities of the Alert and the nature of the emergency condition.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
256.	**6.1.2.2** Augment on-shift resources by activating the Technical Support Center (TSC), Operational Support Center (OSC), and Emergency Operations Facility (EOF) or Back-up EOF	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
257.	**6.1.2.3** Notify the NRC of the Alert.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
258.	**6.1.2.4** Establish the Emergency Response Data System (ERDS) communication link with the NRC.	**Section C.5.a** ERO personnel will activate or confirm activation of ERDS as soon as possible but not later than one hour after declaring an alert or higher emergency classification level in accordance with 10 CFR 50.72(a)(4).	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
259.	**6.1.2.5** Assess and respond to the emergency condition.	No equivalent statement	Standard Plan provides specific responsibilities in Section B.1.a. Figures provide committed response times. General statement is not required.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
260.	**6.1.2.6** Dispatch on-site and off-site radiological survey teams and associated communications.	**Table B-1, Minimum On-Shift and Augmented Staffing**	Plan provides the commitment to dispatch two environmental teams as part of the designated ERO. Table B-1 provides for one team at 60 minutes and one at 90 minutes when the ERO is activated. Activation is required at Alert or above.
261.	**6.1.2.7** Provide periodic plant status updates to off-site authorities (Follow-up Messages).	**Section E.1.a** Follow-up messages are provided periodically to the appropriate offsite authorities. For long duration events with little change in information between messages, the follow-up message time interval can be increased as agreed upon by affected agencies.	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
262.	**6.1.2.8** Provide periodic meteorological assessments to off-site authorities and, if releases are occurring, estimates for actual releases.	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
263.	**6.1.2.9** Terminate the Alert with notification to the State and Local off site authorities and the NRC. OR	**Section M.3** Implementing procedures provide guidance to directly terminate from an Unusual Event, Alert or Site Area Emergency with no long-term plant damage classifications when a normal outage organization is able to address any plant issues, or to transition to a recovery organization.	Section M Recovery and Reentry Planning and Post accident Operations directs post emergency phase. Statement is not relevant to activities in the Emergency Phase.
264.	**6.1.2.10** Escalate to a more severe emergency class.	No equivalent statement	Escalation is driven by the progression EALs as designed in the NEI 99-01 system. Statement is not required.
265.	**6.1.3 Site Area Emergency**	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
266.	**6.1.3.1** Promptly inform the State and Local off–site authorities of the Site Area Emergency and the nature of the emergency condition.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
267.	**6.1.3.2** Augment on-shift resources by activating the Technical Support Center (TSC), Operational Support Center (OSC) and Emergency Operations Facility (EOF) or Back-up EOF.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
268.	**6.1.3.3** Notify the NRC of the Site Area Emergency.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
269.	**6.1.3.4** Establish the ERDS communication link with the NRC.	**Section C.5.a** ERO personnel will activate or confirm activation of ERDS as soon as possible but not later than one hour after declaring an alert or higher emergency classification level in accordance with 10 CFR 50.72(a)(4).	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
270.	**6.1.3.5** Assess and respond to the emergency condition.	No equivalent statement	Standard Plan provides specific responsibilities in Section B.1.a. Figures provide committed response times. General statement is not required.
271.	**6.1.3.6** If radiological and environmental conditions permit evacuate on-site, non-essential personnel.	**Section J.1.a** Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager. Transportation offsite includes use of personnel vehicles and company vehicles if needed.	Standard Plan relocates the guidance to Section J Protective Actions.
272.	**6.1.3.7** Dispatch on-site and off-site radiological survey teams and associated communications as necessary.	**Table B-1, Minimum On-Shift and Augmented Staffing**	Plan provides the commitment to dispatch two environmental teams as part of the designated ERO. Table B-1 provides for one team at 60 minutes and one at 90 minutes when the ERO is activated. Activation is required at Alert or above.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
273.	**6.1.3.8** Provide a dedicated individual for plant status updates to off site authorities.	**Section E.1.a** Follow-up messages are provided periodically to the appropriate offsite authorities. For long duration events with little change in information between messages, the follow-up message time interval can be increased as agreed upon by affected agencies.	Standard plan maintains the commitment for providing follow up messages.
274.	**6.1.3.9** Make utility senior technical and management staff available for consultation with the NRC and State on a periodic basis.	**Section F.1.b** Telephones have been designated for the following NRC communications: • Management Counterpart Link (MCL) (Executive Bridge Line) – This communications line provides a communications link for any NRC internal discussions between the NRC Executive Team Director or Executive Team members and the NRC response team leader or top-level licensee management at the site.	Language has been standardized without change in practice or intent.
275.	**6.1.3.10** Provide meteorological data and dose estimates to off-site authorities for actual releases via a dedicated individual or automated transmission.	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Language standardized between the three plans without change in practice or intent.
276.	**6.1.3.11** Provide release data and dose projections based on available plant condition information and foreseeable contingencies.	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Language standardized between the three plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
277.	**6.1.3.12** Terminate the Site Area Emergency with notification to the State and Local off-site authorities and the NRC. OR	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization.	Section M Recovery and Reentry Planning and Post accident Operations directs post emergency phase. Statement is not relevant to activities in the Emergency Phase.
278.	**6.1.3.13** Enter Recovery with notification to the State and Local off-site authorities and the NRC. OR	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization.	Section M Recovery and Reentry Planning and Post accident Operations directs post emergency phase. Statement is not relevant to activities in the Emergency Phase.
279.	**6.1.3.14** Escalate to a General Emergency.	No equivalent statement	Escalation is driven by the progression EALs as designed in the NEI 99-01 system. Statement is not required.
280.	**6.1.4 General Emergency**	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	
281.	**6.1.4.1** Promptly inform the State and Local off-site authorities of the General Emergency and the nature of the emergency condition.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
282.	**6.1.4.2** Make off-site protective action recommendations to State and Local authorities based on actual or potential plant conditions and radiological releases.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
283.	**6.1.4.3** Augment on-shift resources by activating the Technical Support Center (TSC), Operational Support Center (OSC) and Emergency Operations Facility (EOF) or Back-up EOF.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
284.	**6.1.4.4** Notify the NRC of the General Emergency.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
285.	**6.1.4.5** Establish the ERDS communication link with the NRC.	**Section C.5.a** ERO personnel will activate or confirm activation of ERDS as soon as possible but not later than one hour after declaring an alert or higher emergency classification level in accordance with 10 CFR 50.72(a)(4).	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
286.	**6.1.4.6** Assess and respond to the emergency condition.	No equivalent statement	Standard Plan provides specific responsibilities in Section B.1.a. Figures provide committed response times. General statement is not required.
287.	**6.1.4.7** If radiological and environmental conditions permit evacuate on-site, non--essential personnel.	**Section J.1.a** Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager. Transportation offsite includes use of personnel vehicles and company vehicles if needed.	Standard Plan relocates the guidance to Section J Protective Actions. Section J.1.a specifically addresses SAE and GE.
288.	**6.1.4.8** Dispatch on-site and off-site radiological survey teams and associated communications.	**Table B-1. Minimum On-Shift and Augmented Staffing**	Plan provides the commitment to dispatch two environmental teams as part of the designated ERO. Table B-1 provides for one team at 60 minutes and one at 90 minutes when the ERO is activated. Activation is required at Alert or above.
289.	**6.1.4.9** Provide a dedicated individual for plant status updates to off-site authorities.	**Section E.1.a** Follow-up messages are provided periodically to the appropriate offsite authorities. For long duration events with little change in information between messages, the follow-up message time interval can be increased as agreed upon by affected agencies.	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
290.	**6.1.4.10** Make utility senior technical and management staff available for consultation with the NRC and State on a periodic basis.	**Section F.1.b** Telephones have been designated for the following NRC communications: Management Counterpart Link (MCL) (Executive Bridge Line) – This communications line provides a communications link for any NRC internal discussions between the NRC Executive Team Director or Executive Team members and the NRC response team leader or top-level licensee management at the site.	Language has been standardized without change in practice or intent.
291.	**6.1.4.11** Provide meteorological data and dose estimates to off-site authorities for actual releases via a dedicated individual or automated transmission.	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
292.	**6.1.4.12** Provide release data and dose projections based on available plant condition information and foreseeable contingencies.	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Language standardized between the three plans without change in practice or intent. Table D.3-1 directs substep action.
293.	**6.1.4.13** Enter Recovery with notification to the State and Local off-site authorities and the NRC.	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization.	Section M Recovery and Reentry Planning and Post accident Operations directs post emergency phase. Statement is not relevant to activities in the Emergency Phase.
294.	**6.2 Emergency Response Activation**		
295.	**6.2.1 Notification Scheme**		

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296.	In the event an emergency classification is declared procedures and systems are in place to facilitate timely activation of the site Emergency Response Organization and notification of State and Local authorities, Federal agencies and the general public within the 10 mile EPZ.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation.	Standard Plan standardized the language between the three plans without change in practice or intent.
297.	This section describes the notification methods and processes used to activate on-site and off-site emergency response	No equivalent statement	Sentence states what's in that particular section of the current plan and is irrelevant to Plan activation.
298.	**6.2.1.1 Activation of the On-Site ERO**		
299.	When an abnormal condition is identified by the shift operating staff the duty Control Room Supervisor and Shift Manager are notified. An assessment of the safety significance of the event is performed and a determination of the emergency classification made using the Emergency Action Levels (EALs) contained in the Emergency Plan Implementing Procedures.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Evaluate plant conditions and approve Emergency Action Level (EAL) classifications until relieved.	Standard Plan standardized the language between the three plans without change in practice or intent.
300.	Upon declaring an emergency condition, the duty Shift Manager is responsible for implementation of the Emergency Plan and assumes the role of Emergency Director. The Shift Manager directs the completion of the necessary emergency notifications including the on-site Emergency Response Organization.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Provide overall ERO command and control until relieved.	Standard Plan standardized the language between the three plans without change in practice or intent.
301.	When directed, the Shift Emergency Communicator notifies the site Emergency Response Organization. During normal working hours, ERO notification is made using the plant public address system.	**Section B.1.a** Shift Emergency Communicator (s) • Notify the ERO as needed	Standard Plan standardized the language between the three plans without change in practice or intent.

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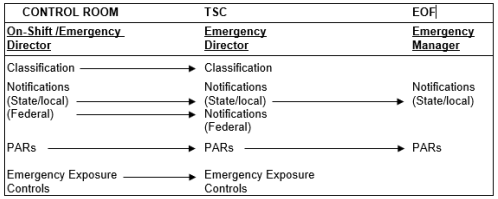
302.	During non-working hours, ERO notification is made using the ERO Pager Network and automated callout system.	No equivalent statement	Standard Plan retains the commitment to notify the ERO in Section B.1.a. Methodology of notification is no longer specified in the plan allowing flexibility and use of latest advances without conflicts with the Plan.
303.	The detailed instructions for ERO notification are contained in the implementing procedures and associated forms and call-lists.	No equivalent statement	Standard Plan retains the commitment to notify the ERO in Section B.1.a. Methodology of notification is no longer specified in the plan allowing flexibility and use of latest advances without conflicts with the Plan.
304.	**6.2.1.2 State and Local Authorities and NRC**		
305.	Under the direction of the Shift Manager (Emergency Director) the Shift Emergency Communicator will notify State and Local authorities and a licensed operator or designee will notify the NRC using commercial telephone and the FTS Emergency Notification System (ENS) respectively. Notification procedures are contained in the Emergency Plan Implementing Procedures and associated forms.	**Section B.1.a** Shift Emergency Communicator • Communicate required information per element E.3 to Offsite Response Organizations (ORO) until relieved **Section B.2.a**  	Standard Plan standardized the language between the three plans without change in practice or intent.

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306.	A security threat to MNGP requires an accelerated notification to the NRC immediately after notification to state and local authorities. The goal is to initiate the accelerated call within about 15 minutes of discovery of an imminent threat or attack against the station.	**Section E.1** An accelerated call to the NRC will be made following discovery of an imminent threat or attack against a plant. The accelerated NRC notification will be completed after or concurrent with notification of local law enforcement agencies. The goal will be to initiate the notification within 15 minutes of discovery of an imminent threat or attack against a site. The information provided in the accelerated notification will be limited to the following: • Site name. • ECL if determined prior to the accelerated notification. • Nature of the threat and the attack status	Standard Plan standardized the language between the three plans without change in practice or intent.
307.	This implements the requirements of SA 05-02, "Safeguards Advisory for Operating Power Reactors", January 26, 2005.	No equivalent statement	Safeguards Advisory was incorporated in the November 2011 Enhanced EP Rulemaking. Reference is no longer applicable.
308.	In addition to the initial notifications, provisions are included in the Emergency Plan Implementing Procedures for follow-up notifications to State authorities which contain the following information (if it is known and appropriate):	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Language standardized between the three plans without change in practice or intent.
309.	**6.2.1.2.1** Location of the incident, name and telephone number of the caller;	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.

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310.	**6.2.1.2.2** Date and time of the incident;	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.
311.	**6.2.1.2.3** Emergency classification;	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.
312.	**6.2.1.2.4** Type of actual or potential release and estimated release duration/impact times;	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.
313.	**6.2.1.2.5** Estimate of quantity of radioactive material released or being released and the release point;	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.

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314.	**6.2.1.2.6** Estimates of relative quantities and concentration of noble gases, iodines and particulates;	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.
315.	**6.2.1.2.7** Meteorological conditions;	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.
316.	**6.2.1.2.8** Actual or projected dose rates at the site boundary and integrated dose at the site boundary;	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.
317.	**6.2.1.2.9** Projected dose rates and integrated dose at projected peak and at about 2, 5 and 10 miles, including affected sectors;	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
318.	**6.2.1.2.10** Estimates of any surface radioactive contamination on-site or off-site;	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.
319.	**6.2.1.2.11** Licensee emergency response actions underway;	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.
320.	**6.2.1.2.12** Recommended emergency actions including protective measures;	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.
321.	**6.2.1.2.13** Request for any needed on-site support by off-site organizations.	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.

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322.	**6.2.1.2.14** Prognosis for worsening or termination of the event based on plant information.	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Follow up notification content is agreed upon by Site and OROs. Need to specifically identify contents in the Plan is removed to permit flexibility in supporting ORO needs without unnecessary administrative Plan changes.
323.	**6.2.1.3 Off-site Emergency Response Organization**		
324.	Notification and activation of the Off-site Emergency Response Organization is accomplished by the Shift Emergency Communicator per the site ERO notification procedures. The ERO notification procedures support the notification of select Xcel Energy/NSPM management and technical personnel who staff the Joint Information Center (JIC).	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation.	Language modified to align with Standard Plan incorporation of the previous separate Off-site Emergency Response Organization into an integrated ERO. Integration subsequently ensures notification upon activation of the Plan consistent with Section E.
325.	**6.2.1.4 General Public**		
326.	The decision to notify the general public will be made by State or Local authorities based on information and recommendations provided by the MNGP. The Emergency Director is initially responsible for recommendations involving notification of the general public and is relieved of this responsibility by the Emergency Manager.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	The Standard Plan retains the commitment to provide a PAR at declaration of a General Emergency.

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327.	Notification of the general public is accomplished through Local Authorities use of the Public Alert and Notification System (ANS), and Emergency Alert System (EAS), and auto dialing telephone systems. The State or Local authorities are responsible for activation of these systems and the information provided to the public. See Section 7.7 and 7.8 for additional information.	**Section E.2** Xcel Energy Alert and Notification Systems (ANS) are described in site-specific annexes. **Monticello Annex, Section E.2** The ANS system consists of a primary and backup activation and monitoring of outdoor warning sirens, primary and backup initiation of the Emergency Alert System (EAS), primary and backup initiation of the Integrated Public Alert and Warning System (IPAWS), and county auto-dial notification systems for special populations.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
328.	**6.2.2 Emergency Action Levels (EALs)**	**Monticello Emergency Action Levels (EALs) (EPLAN-04)**	
329.	The Emergency Action Levels (EALs) for each of the four emergency classifications are outlined in the Initiating Conditions in Annex A. These Emergency Action Levels are also identified for each Initiating Condition in the Emergency Plan Implementing Procedures. State and Local authorities are notified for all four emergency classifications and will activate the appropriate elements of their respective emergency plans based on information provided in the notification from the utility.	**Section D.1.a** EALs at Xcel Energy nuclear sites have been developed in accordance with NEI 99-01 Revision 6, “Development of Emergency Action Levels for Non-Passive Reactors.” This guidance has been approved by the NRC and is applicable to the reactor design at Xcel Energy nuclear sites. **Table D.3-1**	The Plan standardizes the language between the three existing Plans and relocates the EALs to a specific Plan document without change in practice or intent.
330.	**6.2.3 Authentication**		

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331.	Communications made for the purpose of notifying off-site authorities of an emergency will be authenticated before the initiation of their emergency response actions. The methods used for authentication are developed and mutually agreed to by the utility and off-site authorities and are located in the off-site plans.	**Section E.1.a** This notification includes a means of verification or authentication. The authentications is accomplished in accordance with the offsite agency's specific emergency plans. Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	The Plan standardizes the language between the three existing Plans and relocates the EALs to a specific Plan document without change in practice or intent.
332.	**6.3 Assessment Actions**		
333.	**6.3.1 Determining Magnitude of Release**		
334.	The magnitude of releases and release rates from normal pathways (e.g., Stack and Reactor Building vent) are determined using installed plant instrumentation. Installed side-stream isokinetic samplers and wide-range radiation monitors normally monitor plant effluent releases, and would be the primary method used in an emergency. Portable hand held radiation instruments are used in the event the installed monitors become inoperable.	**Section I.1, I.1.a** The magnitude of a release of radioactive material to the environment is primarily identified directly by effluent monitors. Survey and sample analysis may also be used to determine the magnitude of a release. Indirect means such as core damage estimates and release pathway assumptions may be used to estimate the magnitude of a release of radioactive material.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
335.	Releases from other than normal pathways (e.g., hard pipe containment vent) will be estimated either from installed plant instrumentation or from a determination of the amount of activity available for release plus the particulars of the release path. Field measurements will be used to assist in the assessment effort by making physical measurements of dose rates and airborne, liquid and surface contamination. Field measurements are primarily the responsibility of the Radiation Protection Support Group, headquartered at the EOF, and under the direction of the Emergency Manager.	**Section I.1, I.1.a** The isotopic composition of a release of radioactive material to the environment may be determined by; (1) specialized gaseous monitors that distinguish between gases, iodines and particulate, (2) survey and sample analysis, or (3) source term estimates based on core damage and release pathway assumptions. Dose assessment model methods are capable of estimating source term and magnitude of gaseous releases from effluent monitors or plant parameter data and release rate projections	The Plan standardizes the language between the three existing Plans without change in practice or intent.
336.	**6.3.2 Off-Site Dose Projection**		
337.	The primary means of performing dose projections is RASCAL (Radiological Assessment System for Consequence Analysis) using the Unified RASCAL Interface(URI).	**Section I.1.b** Xcel Energy uses site-specific versions of the Unified RASCAL Interface (URI) off-site dose projection computer model. The underlying dose assessment model in URI is the NRC RASCAL 4 model, based on the methods and equations documented in NUREG-1940.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

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338.	URI provides a site specific overlay on RASCAL meteorological, dispersion, and dose assessment models for all required input for emergency dose assessment as well as reports and plume graphics. Using URI, the user does not interact with any part of the original RASCAL input or output screens. Meteorological and effluent data from process monitors and meteorological instruments located at the plant site is entered into RASCAL using URI. This data is available from one central location to be used by the Dose Projection Specialist for entry into the dose projection software.	**Section I.1.b** Xcel Energy uses site-specific versions of the Unified RASCAL Interface (URI) off-site dose projection computer model. The underlying dose assessment model in URI is the NRC RASCAL 4 model, based on the methods and equations documented in NUREG-1940. The URI model provides off-site radiological dose and dose rate estimates based on near real time or hypothetical inputs. Projected dose is based on EPA-400 dose conversion factors and provided as; (1) the total effective dose equivalent, or TEDE (the sum of the effective dose equivalent from immersion, 4 days of ground deposition, and the committed effective dose equivalent from inhalation), and (2) the committed dose equivalent to the thyroid (CDE thyroid). URI dose projection results are given for various locations from the site boundary to 10 miles. URI can provide dose assessment results for multiple release points from the site.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
339.	The URI code supports three modes of operation: Rapid Assessment, Detailed Assessment, and Sum Assessment.	No equivalent statement	Detailed description of the various modes of operation of the dose model is not beneficial at the Plan level. See Column 2 Line 337 for general description of capabilities.
340.	**6.3.2.1 Rapid Assessment**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
341.	This mode is intended for use as an aid to supporting decision makers during the initial phases of a rapidly evolving incident. It is useful for quickly providing estimates of offsite dose projections relative to established Protective Action Guideline (PAG) exposure levels in support of initial protective action decision-making but limits options in order to simplify the assessment.	No equivalent statement	Detailed description of the various modes of operation of the dose model is not beneficial at the Plan level. See Column 2 Line 337 for general description of capabilities.
342.	**6.3.2.2 Detailed Assessment**		
343.	This mode provides a user-interface to produce more deliberate and comprehensive offsite dose projections than those produced by the Rapid Assessment option. It supports development of refined off-site dose projections based on changing plant status and/or meteorological conditions or field monitoring and sampling results.	No equivalent statement	Detailed description of the various modes of operation of the dose model is not beneficial at the Plan level. See Column 2 Line 337 for general description of capabilities.
344.	**6.3.2.3 Sum Assessment**		
345.	This mode permits the user to add archived data from previously completed dose assessments into a single report characterizing multiple concurrent releases. It is an additive process, producing a composite report and is solely for concurrent releases rather than integration of an entire event.	No equivalent statement	Detailed description of the various modes of operation of the dose model is not beneficial at the Plan level. See Column 2 Line 337 for general description of capabilities.
346.	The URI supports expected emergency effluent dose assessment changes such as summing of multiple release/multiple source events and assessment to 50 miles.	No equivalent statement	Detailed description of the various modes of operation of the dose model is not beneficial at the Plan level. See Column 2 Line 337 for general description of capabilities.

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347.	The URI program can be run from computer stations located in the Control Room, TSC, EOF, and the Back-up EOF. Independent battery powered laptop computers are available in the TSC, EOF and Back-up EOF.	No equivalent statement	Detailed description of the various modes of operation of the dose model is not beneficial at the Plan level. See Column 2 Line 337 for general description of capabilities.
348.	The Radiological Emergency Coordinator has the capability to estimate the total off-site population dose (manrem) received during a release.	**Section B.1.a** Radiological Assessment Coordinator (RAC) • Assess and communicate offsite radiological conditions • Provide oversite for dose assessments and projections • Develop and recommend PARs	The Plan standardizes the language between the three existing Plans without change in practice or intent.
349.	The off site dose assessment computer will supply the projected dose rates or doses (whole body and thyroid) at various distances.	**Section I.1.b** Xcel Energy uses site-specific versions of the Unified RASCAL Interface (URI) off-site dose projection computer model. The underlying dose assessment model in URI is the NRC RASCAL 4 model, based on the methods and equations documented in NUREG-1940. The URI model provides off-site radiological dose and dose rate estimates based on near real time or hypothetical inputs. Projected dose is based on EPA-400 dose conversion factors and provided as; (1) the total effective dose equivalent, or TEDE (the sum of the effective dose equivalent from immersion, 4 days of ground deposition, and the committed effective dose equivalent from inhalation), and (2) the committed dose equivalent to the thyroid (CDE thyroid). URI dose projection results are given for various locations from the site boundary to 10 miles. URI can provide dose assessment results for multiple release points from the site.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

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350.	Field Team radiation survey results may also be used to determine the off-site dose rates. Population distribution charts comprised of the sectors and distances from the plant are available.	**Section I.1.b** URI dose projection results and field monitoring readings are used in assessing radiological EALs and PARs.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
351.	The Radiological Emergency Coordinator will determine the applicable doses or dose rates in the sectors and calculate the estimated total population dose by referring to the population totals in the sectors of interest.	**Section B.1.a** Radiological Assessment Coordinator (RAC) • Assess and communicate offsite radiological conditions • Provide oversite for dose assessments and projections • Develop and recommend PARs	The Plan standardizes the language between the three existing Plans without change in practice or intent.
352.	**6.3.3 Field Radiation Surveys**		
353.	The task of field radiation surveillance will be accomplished by two (2) teams under the supervision of Emergency Operations Facility (EOF) personnel. The EOF will be the central point for receipt and analysis of all off-site field monitoring data.	**Section I.1.c** Off-site environmental monitoring is performed by qualified field monitoring team personnel under the direction of the TSC Field Team Monitor.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
354.	Survey teams will normally be composed of 2 individuals each, at least one of whom SHALL be trained in radiological field monitoring. Each team SHALL be equipped with appropriate monitoring equipment, including dose rate instruments, air sampling equipment and sample collection media and containers.	**Section B.1.a, Table B-1, Minimum On-Shift and Augmented Staffing**	The Plan standardizes the language between the three existing Plans without change in practice or intent.
355.	This equipment has the capability to detect and measure radioiodine concentrations in the air as low as 1x10-7 µCi/cc under field conditions.	**Section I.7** Xcel Energy field monitoring equipment has the capability to detect and measure airborne radioiodine concentrations as low as 1E-7 µCi/cc in the presence of noble gases.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
356.	The estimated deployment time for the initial and second monitoring team is 60 minutes and 90 minutes respectively from an Alert or higher classification.	**Table B-1, Minimum On-Shift and Augmented Staffing**	The Plan standardizes the language between the three existing Plans without change in practice or intent.
357.	**6.4 Corrective Actions**		

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358.	**6.4.1 Fire Control**		
359.	The Fire Brigade, which is composed entirely of plant personnel, is fully equipped, trained and capable of dealing with fire emergencies. At the direction of the Emergency Director and the Brigade Leader, the Fire Brigade will be deployed as necessary.	No equivalent statement	NUREG-0654, Revision 2, focuses on EP functions and permits activities covered under other site approved Plans to no longer be addressed in the Emergency Plan.
360.	**6.4.2 Repair and Damage Control**		
361.	The repair and damage control functions are assigned to the Maintenance Group. Personnel are assigned according to the skills they possess so that the team is capable of coping with the emergency situation. Repair and damage control team members are selected from available personnel.	**Section B.1.a** Maintenance Coordinator • Supporting the repair and corrective actions • Supporting Search and Rescue efforts Maintenance Coordinators • Provide oversight for OSC activities related to mechanical, electrical and I&C work	NUREG-0654, Revision 2, focuses on EP functions and permits activities covered under other site approved Plans to no longer be addressed in the Emergency Plan. Section B.1.a of the plan provides ERO position interface responsibilities.
362.	**6.5 Protective Actions**		
363.	**6.5.1 Protective Cover, Evacuation, Personnel Accountability**		
364.	In the course of an emergency situation where there is an actual or potential release of radioactive material to the environs in excess of normal operating levels, an assessment of projected exposure to persons on-site and off-site will be made. The result of this assessment will be a determining factor for implementing protective actions.	**Section J.6** PARs for preventing or minimizing exposure to the public and are based on Environmental Protection Agency (EPA) 400-R-92-001, “Manual of Protective Action Guides and Protective Actions for Nuclear Incidents,” and NUREG-0654, Revision 1, Supplement 3. PARs are provided to the offsite agencies responsible for implementing protective actions for the public within the 10-mile EPZ.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

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365.	In the course of an emergency situation where there is an actual or potential release of radioactive material to the environs in excess of normal operating levels, an assessment of projected exposure to persons on-site and off-site will be made. The result of this assessment will be a determining factor for implementing protective actions.	**Section J.6** Protective actions that can be recommended to the state and counties include the following: • Evacuation. • Shelter in place. • Thyroid blocking agent in accordance with state plans and policy. PAR decision-making flowcharts are site-specific in nature and are provided in implementing procedures. Sites have the capability to provide state and local agencies an ad hoc PAR for beyond the 10-mile EPZ.	The Plan standardizes the language between the three existing Plans without change in practice or intent
366.	**6.5.1.1** Plant Site		
367.	During the course of an emergency, the REC is responsible for on-site monitoring operations. The on-site monitoring procedures contain criteria for initiating evacuations of various degrees. In all cases of elevated radiation levels or in potentially hazardous situations, non-essential personnel will be evacuated from affected areas of the plant. A plant evacuation is required at the Site Area Emergency level, radiological and environmental conditions permitting. The plant evacuation includes the owner-controlled area outside of the Protected Area.	**Section J.1.a** Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager. Transportation offsite includes use of personnel vehicles and company vehicles if needed.	The Plan standardizes the language between the three existing Plans without change in practice or intent. Section J.1.a specifically addresses SAE and GE actions.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
368.	A personnel accounting process is part of a plant or site evacuation. A system using the plant security computer and individual Security I.D. badges enables the Emergency Director to account for all personnel within the Protected Area in 30 minutes or less. Card readers are located at the TSC, Security Access Facility and Access Control to expedite the process.	**Section J.4** Assembly and accountability is conducted following the declaration of a Site Area or General Emergency, or at the discretion of the Emergency Director and is initiated via site assembly announcement. Accountability of personnel within the Protected Area is accomplished within 30 minutes following emergency declaration and maintained continuously thereafter as described in the Security Plan. Accountability may be delayed during a security event if the Emergency Director, in consultation with Security, determines that performing accountability could be detrimental to the safety of plant personnel. If accountability is delayed, then accountability will be performed as soon as conditions permit.	The Plan standardizes the language between the three existing Plans without change in practice or intent
369.	Backup methods are also available in case of a computer malfunction.	No equivalent statement	Plan retains the commitment to perform the Accountability in a timely manner. Methodology is maintained in Implementing Procedures.
370.	Personnel within the plant are notified of an evacuation by the plant Public Address (PA) system. A warning tone and voice instructions are part of the procedure. Time required for this process is less than 5 minutes from decision to evacuate.	**Section J.1** Alarms are available for alerting personnel of hazardous conditions such as fire or increasing radiation levels at the site. Site communications methods are available for notification of personnel outside the Protected Area and within the Owner Controlled Area. Instructions are provided to plant personnel that describe the protective action to be taken in each instance. The implementing procedures describe the assembly areas for personnel on-site.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
371.	Personnel outside of the plant buildings are notified by the plant evacuation siren, which is located atop the Reactor Building. The siren initiation is simultaneous with the PA system alarm.	**Section J.1** The implementing procedures also describe provisions made to alert personnel in high noise areas and outbuildings within the Protected Area and within the Owner Controlled Area.	The Plan standardizes the language between the three existing Plans without change in practice or intent
372.	After the accounting process is completed, Security personnel are dispatched to ensure that all personnel in the Owner Controlled Area outside the Protected Area have been notified. This process should be completed within 60 minutes of the start of the evacuation.		Plan retains the commitment to perform the Accountability in a timely manner. Methodology is maintained in Implementing Procedures.
373.	In the event of a Site Area or General Emergency, the following actions will be taken:	**Section D.3, Table D.3-1, Matrix of Emergency Response Measures by ECL**	No change. Matrix outlines protective actions for SAE and GE conditions.
374.	**6.5.1.1.1** All plant employees not having emergency assignments at the site and having been cleared of radioactive contamination, will be directed to proceed to the Emergency Operations Facility, a designated off-site assembly point or sent home;	**Section J.1.a** Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager. Transportation offsite includes use of personnel vehicles and company vehicles if needed.	The Plan standardizes the language between the three existing Plans without change in practice or intent. Section J.1.a specifically addresses SAE and GE actions.
375.	**6.5.1.1.2** All working and non-working visitors and contractor and construction personnel, having been cleared of radioactive contamination, will be directed to leave the site, unless requested otherwise by the Emergency Director;		The Plan standardizes the language between the three existing Plans without change in practice or intent. Section J.1.a specifically addresses SAE and GE actions.
376.	**6.5.1.1.3** Persons who may be within the restricted area but outside the security fence, will be directed to proceed to the designated assembly point for accountability and radioactive contamination check before being directed to leave the site.	**Section J.1** The implementing procedures also describe provisions made to alert personnel in high noise areas and outbuildings within the Protected Area and within the Owner Controlled Area.	The Plan standardizes the language between the three existing Plans without change in practice or intent

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
377.	**6.5.1.1.4** Persons who are not cleared of radioactive contamination following a plant evacuation will be decontaminated at a location on the plant site, at an off-site assembly point, or at a County Emergency Worker Monitoring and Decontamination Facility.	**Section J.3** Requirements for radiological monitoring of personnel evacuated from the site are contained in Section L and address appropriate actions for any known or suspected overexposures or contamination. Details on the decontamination of evacuees are in Radiological Protection Procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent
378.	**6.5.1.2** Onsite Protective Actions for Hostile Action Events		
379.	**6.5.1.2.1** Onsite Protective Actions designed for protection of personnel as described in Section 6.5.1.1 may be inappropriate for a Hostile Action Event. Alternate actions as described in NSIR/DRP-ISG-01 Section IV.F have been developed and proceduralized.	**Section J.5** Onsite protective actions for routine and emergency conditions are detailed in the plant's Radiation Protection Program. During an emergency, protective actions would be taken to minimize radiological exposures or contamination affecting onsite personnel. A range of protective actions appliable to site personnel include: • Assembly/Accountability • Site Evacuation • Issuance of KI	The Plan standardizes the language between the three existing Plans without change in practice or intent.
380.	**6.5.1.3 Off-Site Public**		
381.	Actions planned to protect the off-site public and criteria for their implementation are described in the MINNESOTA EMERGENCY OPERATIONS PLAN.	**Section J.6** PARs for preventing or minimizing exposure to the public and are based on Environmental Protection Agency (EPA) 400--R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," and NUREG-0654, Revision 1, Supplement 3. PARs are provided to the offsite agencies responsible for implementing protective actions for the public within the 10-mile EPZ.	Plan retains the commitment to make a broad range of Protective Action Recommendations consistent with Federal guidance. Statement of actions taken by the OROs is not relevant to implementing the Emergency Plan.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
382.	Initiation of protective actions for off-site areas is the responsibility of the State of Minnesota. Prior to the EOF being activated, the Emergency Director will make recommendations for protective actions if it is determined that they are necessary. Recommendations will be directed to the State EOC and will come directly from the Emergency Director.	**Section J.6** PARs for preventing or minimizing exposure to the public and are based on Environmental Protection Agency (EPA) 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," and NUREG-0654, Revision 1, Supplement 3. PARs are provided to the offsite agencies responsible for implementing protective actions for the public within the 10-mile EPZ.	Plan retains the commitment to make a broad range of Protective Action Recommendations consistent with Federal guidance. Statement of actions taken by the OROs is not relevant to implementing the Emergency Plan.
383.	. If the State EOC is not activated and it is determined by MNGP that immediate protective actions should be initiated at the MN Duty Officer and Local level, the recommendation will be made directly to the MN Duty Officer and Local authorities. When the EOF is activated, the protective action recommendation function will normally be transferred to the Emergency Manager.		
384.	The current issue of the "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" (EPA 400-R-92) SHALL be used as a basis for recommendations for protective actions for the off-site public; however, more conservative protective actions based on discussions with the State may be recommended in the course of an emergency.	**Section I.1.b** The URI model provides off-site radiological dose and dose rate estimates based on near real time or hypothetical inputs. Projected dose is based on EPA-400 dose conversion factors and provided as; (1) the total effective dose equivalent, or TEDE (the sum of the effective dose equivalent from immersion, 4 days of ground deposition, and the committed effective dose equivalent from inhalation), and (2) the committed dose equivalent to the thyroid (CDE thyroid).	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
385.	Protective action recommendations SHALL also be consistent with the guidance of the U.S. Food and Drug Administration's, Department of Health and Human Services' document titled "Accidental Radioactive Contamination of Human Food and Animal Feeds: Recommendations for State and Local Agencies," August 1998.	No equivalent statement	Protective Actions described in Column 1 apply to situations beyond the Emergency Phase and are the responsibility of the ORO organizations. Section J outlines the Protective Action Recommendations based on EPA-400 that are the responsibility of the Licensee in the Emergency Phase.
386.	Tables 2, 3, 4 and 5 provide guidelines and action levels to be used in the formulation of protective action recommendations.	**Section I.1.b** The URI model provides off-site radiological dose and dose rate estimates based on near real time or hypothetical inputs. Projected dose is based on EPA-400 dose conversion factors and provided as; (1) the total effective dose equivalent, or TEDE (the sum of the effective dose equivalent from immersion, 4 days of ground deposition, and the committed effective dose equivalent from inhalation), and (2) the committed dose equivalent to the thyroid (CDE thyroid).	The Plan standardizes the language between the three existing Plans without change in practice or intent.
387.	Tables 2, 3, 4 and 5 provide guidelines and action levels to be used in the formulation of protective action recommendations.	**Section J.7** Plant conditions, projected dose and dose rates and field monitoring data are communicated to offsite agencies responsible for dose assessment/PARs to assist them in developing parallel assessments. Site-specific protective action strategies, informed by the site-specific ETEs, have been developed using guidance provided in NUREG-0654, Revision 1. Supplement 3, Guidance for Protective Action Strategies, in coordination between Xcel Energy and the site-specific Offsite Response Organizations (OROs) and are included in implementing procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
388.	**6.5.2** Routes for Site Evacuation		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
389.	Evacuation of personnel from the site SHALL be accomplished in personal private vehicles and augmented by MNGP vehicles when necessary and available. Personnel are to proceed to the designated assembly area as directed by traffic control personnel.	**Section J.1.a** Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager. Transportation offsite includes use of personnel vehicles and company vehicles if needed.	The Plan standardizes the language between the three existing Plans without change in practice or intent. Section J.1.a specifically addresses SAE and GE actions.
390.	**6.5.2.1** Monticello Service Center Assembly Area – 118 Dundas Road, Monticello, Minnesota	**Monticello Annex, Section J.2** Evacuation is coordinated with the OROs and may be to individual homes or designated offsite locations, Monticello Service Center or Sherco Generation Plant, should radiological monitoring of site personnel be needed. Pre-established primary and alternate routes for each location have been established and are maintained in implementing procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
391.	**.5.2.2** Xcel Energy Sherburne County Generating Plant (Sherco) – 13999 Industrial Blvd, Becker, Minnesota	**Monticello Annex, Section J.2** Evacuation is coordinated with the OROs and may be to individual homes or designated offsite locations, Monticello Service Center or Sherco Generation Plant, should radiological monitoring of site personnel be needed. Pre-established primary and alternate routes for each location have been established and are maintained in implementing procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
392.	**6.5.3** Evacuation Time Estimates (ETE) – Plume Exposure EPZ		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
393.	Time estimates for evacuation of the plume exposure EPZ are referenced in an appendix to the Off-site Nuclear Emergency Plan and in the Plant Emergency Plan Implementing Procedure for making off–site protective action recommendations. MNGP and the State of Minnesota use the ETE to develop pre-determined protective action recommendations.	**Monticello Annex, Section J.8.a** The MNGP site specific ETE report is documented in, Monticello Nuclear Generating Plant Evacuation Time Estimates, EPLAN-06. **Section J.7** Plant conditions, projected dose and dose rates and field monitoring data are communicated to offsite agencies responsible for dose assessment/PARs to assist them in developing parallel assessments. Site-specific protective action strategies, informed by the site-specific ETEs, have been developed using guidance provided in NUREG-0654, Revision 1. Supplement 3, Guidance for Protective Action Strategies, in coordination between Xcel Energy and the site-specific Offsite Response Organizations (OROs) and are included in implementing procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
394.	**6.5.4 Use of On-Site Protective Equipment and Supplies**		
395.	**6.5.4.1 Respiratory Protection and Protective Clothing**		
396.	In an emergency situation, the protection afforded by individual respiratory equipment must be weighed against the negative aspects of its use. In the case where a respirator may lead to additional external exposure because of the inherent difficulties of working while wearing a respirator, it may be prudent to forego the respirator in favor of a lower total dose to the individual.	No equivalent statement	Section K of the Standard Plan provides overall guidance, consistent with site RP procedures for the control and management of exposure and contamination.

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397.	In general the use of protective clothing and respiratory protection equipment will be governed by existing Radiation Protection Procedures. The Radiological Emergency Coordinator will make decisions on the use of this equipment during emergency situations.	**Section K.1.f** Emergency response teams, including FMTs, that must enter areas where they might be expected to receive higher than normal doses will be briefed on the task assigned, risks associated with the task, the planned route to destination, allowed dose and dose rates, stay time, protective clothing/equipment and other hazards or conditions as applicable.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
398.	A supply of protective clothing is stored in the TSC.	**Section J.5** Each site maintains an inventory of equipment and potassium iodide (KI) available for use by emergency workers. The Emergency Director has the responsibility for approval of issuing KI to site emergency workers.	Section K of the Standard Plan provides overall guidance, consistent with site RP procedures for the control and management of exposure and contamination.
399.	A very limited supply of this equipment is stored at each assembly point. Large supplies of respiratory equipment are stored at the plant access control area and protective clothing will normally be available in the warehouse located outside the security fence.	**Section J.5** Each site maintains an inventory of equipment and potassium iodide (KI) available for use by emergency workers. The Emergency Director has the responsibility for approval of issuing KI to site emergency workers.	Section K of the Standard Plan provides overall guidance, consistent with site RP procedures for the control and management of exposure and contamination.
400.	**6.5.4.2 Thyroid Prophylaxis**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
401.	A supply of potassium iodide (KI) will be maintained at the Technical Support Center and the Emergency Operations Facility. Each of these locations will have a minimum of 200 boxes, each of which contain a 10-day supply of KI at recommended dosages for one person. In the event that an individual is expected to receive a dose to the thyroid in excess of 25 Rem (due to radioiodine uptake), the use of KI as a blocking agent may be recommended. KI will not be made available to off-site personnel under this plan.	**Section J.5** Each site maintains an inventory of equipment and potassium iodide (KI) available for use by emergency workers. The Emergency Director has the responsibility for approval of issuing KI to site emergency workers.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
402.	**6.5.5 Emergency Exposure Control**		
403.	**6.5.5.1 Exposure Limits**		
404.	Although an emergency situation transcends the normal requirements of limiting exposure, there are suggested levels for exposure to be accepted in emergencies. Immediate re-entry may be necessary to account for missing personnel or to secure vital equipment.	**Section K.1.a** The Emergency Director has responsibility for authorizing personnel exposure levels under emergency conditions using the guidance in Environmental Protection Agency (EPA) 400-R-92-001, “Manual of Protective Action Guides and Protective Actions for Nuclear Incidents.”	The Plan standardizes the language between the three existing Plans without change in practice or intent.
405.	Additional exposure for this purpose must be approved by the Emergency Director based on the following criteria and the guidelines in Table 5:	**Table K.1.a**	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
406.	**6.5.5.1.1** In order to avoid restricting actions that may be necessary to save lives or protect the health and safety of the public, it SHALL be the discretion of the Emergency Director that determines the amount of exposure that will be permitted in order to perform the emergency mission. However, the dose resulting from emergency exposure should be limited to 25 REM for life-saving activities and the protection of large populations. Individuals undertaking any emergency operation in which the dose will exceed 25 REM to the whole body should do so only on a voluntary basis and with full awareness of the risk involved (EPA-400).	**Section K.1.a** The Emergency Director has responsibility for authorizing personnel exposure levels under emergency conditions using the guidance in Environmental Protection Agency (EPA) 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents."	The Plan standardizes the language between the three existing Plans without change in practice or intent.
407.	**6.5.5.1.2** In situations where protecting valuable property is involved, the dose resulting from emergency exposure should be limited to 10 REM (EPA-400).	**Table K.1-a, Emergency Worker Dose Limits**	The Plan standardizes the language between the three existing Plans without change in practice or intent.
408.	**6.5.5.2 Exposure Control**		
409.	Under emergency conditions, exposure control would be implemented in accordance with the Emergency Plan Implementing Procedure A.2-401 (EMERGENCY EXPOSURE CONTROL).	**Section K.1.a** Plant management approval is required before emergency workers are allowed to exceed the maximum administrative radiation dose.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
410.	Each person entering the controlled area would be required to wear a permanent record device and a self reading dosimeter (SRD).	**Section K.1.c** Personnel monitoring equipment is issued to and worn by personnel as required in 10 CFR 20 and RP procedures as a record of radiation exposure. Other radiation detection devices are available for use by emergency workers to allow real time measurement of exposure.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
411.	The responsibility for maintaining exposure control for site activities rests with the Radiological Emergency Coordinator and the Radiation Protection Group. With this responsibility would be the option of establishing Access Control at alternate locations on site if the primary access control facility becomes uninhabitable. In this event, the access control function would be relocated to an alternate location within the Administration Building, Security Access Facility or the EOF. In any case, strict exposure control of all individuals passing through the access point would be maintained on a 24 hour basis.	**Section K.1.a** The Emergency Director has responsibility for authorizing personnel exposure levels under emergency conditions using the guidance in Environmental Protection Agency (EPA) 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents."	The Plan standardizes the language between the three existing Plans without change in practice or intent. Section K.1.a assigns responsibility for exposure authorizations to the Emergency Director. The remainder of Section K provides overall guidance for implementation of onsite radiation protection/control.
412.	In order to enhance the exposure control process and to provide dosimetry for an expanded number of people, a dosimetry vendor would be called upon to expedite the shipment of extra dosimetry devices and to supply personnel and instrumentation for on-site appraisal of exposures.	No equivalent statement	The Plan standardizes the language between the three existing Plans without change in practice or intent. The remainder of Section K provides overall guidance for implementation of onsite radiation protection/control.
413.	It must be noted, however, that every effort will be made to keep the exposures of plant staff personnel and off-site emergency personnel below the limits for normal operations.	No equivalent statement	The Plan standardizes the language between the three existing Plans without change in practice or intent. The remainder of Section K provides overall guidance for implementation of onsite radiation protection/control.
414.	**6.5.6 Contamination Control Measures**		
415.	**6.5.6.1 Plant Site**		
416.	The Radiation Protection Group is responsible for preventing or minimizing direct or subsequent ingestion exposure to radioactive materials deposited on the ground or other surfaces. Personnel, material and equipment will be checked at	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
	the main access control point. Decontamination will be effected when needed and when practical. Equipment which cannot be decontaminated will remain within the Radiological Controlled Area or be controlled through a conditional release process.	**Section K.1.e** Guidelines as established in radiation protection procedures will be used to determine action levels for decontamination. Radiation protection procedures have been established for decontamination of emergency workers and equipment. The means for disposal of contaminated waste are also established.	
417.	The site guidelines for release of equipment to a clean area are no detectable licensed radioactive material above background, using the following criteria:		
418.	**6.5.6.1.1** A. Use of a counting system that meets a minimum detection sensitivity of 1000 dpm/100cm2 beta/gamma provided that this equates to an MDA no higher than 20 dpm/100cm2 alpha based on 10 CFR 61 plant beta to alpha ratios.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent. The Plan maintains the commitment for contamination control without specifying methodologies.
419.	**6.5.6.1.2** B. Using a frisker type instrument to conduct a direct frisk survey with no reproducible counts above background provided background is < 200 cpm.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent. The Plan maintains the commitment for contamination control without specifying methodologies.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
420.	Should any normally clean areas become contaminated in excess of 20 dpm/100 cm2 alpha or 1000 dpm/100 cm2 beta gamma (as determined by smear tests), they SHALL be barricaded or roped and posted as a Contaminated Area, per normal plant procedures. Such areas SHALL be decontaminated as soon as practical. Access to such areas which lie outside the protected area will be controlled by plant security until properly decontaminated and cleared.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent. The Plan maintains the commitment for contamination control without specifying methodologies.
421.	Under emergency conditions, the Radiological Emergency Coordinator has the option of implementing emergency guidelines for contamination control which are in excess of normal limits.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
422.	The Radiation Protection Group is responsible for controlling all food and water supplies at the plant during an emergency. Whenever an evacuation due to radiological condition occurs, all food and water supplies within the evacuated area will be considered contaminated and measures will be taken to prevent their use.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
423.	Before any water or food may be consumed, the Radiation Protection Group must verify that the water/food is not contaminated and the area in which it is consumed is less than detectable using normal contamination survey methods.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
424.	Random samples of water/food SHALL be analyzed for contamination on a periodic basis.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
425.	**6.5.6.2 Off-Site Areas**		
426.	Protective actions planned for persons in off-site areas and criteria for their implementation are described in the MINNESOTA EMERGENCY OPERATIONS PLAN.	**Section A.1.a** The Emergency Management Agencies representing the Minnesota counties of Sherburne, Wright, Dakota, and Goodhue and the Wisconsin County of Pierce have the responsibility for notification and providing direction to residents in the event of an emergency that affects their respective jurisdiction. The 24-hour notification points have the responsibility to notify necessary local civil support groups in the event of an accident. The County is responsible for protection of the public and can provide personnel and equipment for evacuation, relocation, and isolation	The Plan standardizes the language between the three existing Plans without change in practice or intent.
427.	**6.6 Aid to Affected Personnel**		
428.	In case of an accident or emergency, protection of personnel from radioactive contamination and exposure is the responsibility of the Radiation Protection Group. The highest priority for medical treatment of radiation injuries are personnel suspected of receiving 25 rem or more of penetrating radiation to the whole body.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures. **Section L.2.b** Arrangements have been made with local hospitals for the medical treatment of contaminated injured personnel. Primary and backup offsite medical facilities to treat contaminated injured personnel are described in the site-specific annexes.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
429.	The order of medical treatment will be: A. Immediate care of serious injuries B. Decontamination of personnel C. Care of other injuries D. Determining any internal contaminations through bioassays and whole body counts. E. Follow-up treatment	No equivalent statement	Triage of contaminated/injured personnel is a case-by-case situation and inappropriate to establish a Plan level. The Standard Plan retains the capability to manage various facets of the situation. Triage/response will be managed based on the situation.
430.	**6.6.1 Decontamination and First Aid**		
431.	**6.6.1.1 Decontamination**		
432.	As soon as practical, attempts SHALL be made to decontaminate individuals found to be contaminated.	**Section L.2.c** Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.	Plan Language has been aligned to the elements contained in Section L Medical and Public Health Support. The provisions include equipment and capabilities to respond to contaminated injured personnel. The Plan aligns to the commitment to support the capability. Language related to specific treatment has been eliminated to procedural level.
433.	First aid or removal from a hazardous environment, however, SHALL take precedence over decontamination actions. Precautions will be taken to prevent the spread of contamination to other parts of the body.		
434.	Particular attention will be paid to open wounds in order to prevent internal contamination.	No equivalent statement	Plan Language has been aligned to the elements contained in Section L Medical and Public Health Support. The provisions include equipment and capabilities to respond to contaminated injured personnel. The Plan aligns to the commitment to support the capability. Language related to specific treatment has been eliminated to procedural level.
435.	Contamination monitoring will be accomplished using thin window GM pancake-type probes for maximum sensitivity. Each assembly area where decontamination may be conducted is equipped with one or more of these instruments.	No equivalent statement	Plan Language has been aligned to the elements contained in Section L Medical and Public Health Support. The provisions include equipment and capabilities to respond to contaminated injured personnel. The Plan aligns to the commitment to support the capability. Language related to specific treatment has been eliminated to procedural level.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
436.	The primary decontamination facility is located in the plant Access Control Area. Two showers and a large sink, plus various other supplies are provided for this express purpose. If the primary facility is not accessible, decontamination kits are also provided in the emergency supplies for the EOF and off site Assembly Points. Decontamination operations at an Assembly Point would be on a small scale due to limited resources. If necessary, contaminated personnel at an Assembly Point will be placed in protective clothing and transported to an adequate facility.	No equivalent statement	Plan Language has been aligned to the elements contained in Section L Medical and Public Health Support. The provisions include equipment and capabilities to respond to contaminated injured personnel. The Plan aligns to the commitment to support the capability. Language related to specific treatment has been eliminated to procedural level.
437.	The decontamination kits contain the equipment and materials necessary for small scale personnel decontamination operations.	No equivalent statement	Plan Language has been aligned to the elements contained in Section L Medical and Public Health Support. The provisions include equipment and capabilities to respond to contaminated injured personnel. The Plan aligns to the commitment to support the capability. Language related to specific treatment has been eliminated to procedural level.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
438.	Decontamination materials are made available for use at Access Control, EOF, and Off-Site Assembly Points to deal with various skin contamination.	**Section L.4** In addition to the information provided in element L.2, radiation monitoring is provided by Xcel Energy personnel whenever it becomes necessary to use an ambulance service for the transportation of contaminated persons. Injured personnel are evaluated for radiological contamination using contamination control practices to transport to a medical facility per radiation protection procedures. Xcel Energy personnel will assist with decontamination of transport vehicles if necessary. Ambulance services are described in the site-specific annexes.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
439.	The waste generated in decontamination operations will be retained for proper disposal.	**Section K.1.e** Guidelines as established in radiation protection procedures will be used to determine action levels for decontamination. Radiation protection procedures have been established for decontamination of emergency workers and equipment. The means for disposal of contaminated waste are also established.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
440.	**6.6.1.2 First Aid**		
441.	Fire Brigade personnel receive first aid training (Red Cross Multi-Media or equivalent) on a periodic basis. The level of skills is sufficient for the time it takes for off-site medical personnel to arrive.	**Section L.2.a** First aid capability is maintained as part of each site's Fire Protection Plan.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
442.	**6.6.2 Medical Transportation**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
443.	Arrangements for transportation of radiologically contaminated casualties have been made with local hospital's Ambulance Service. The personnel at the service receive radiological training from MNGP Training Staff members on a regular basis. The procedure for handling contaminated personnel includes protective measures for equipment as well as the ambulance service personnel.	**Section L.4** In addition to the information provided in element L.2, radiation monitoring is provided by Xcel Energy personnel whenever it becomes necessary to use an ambulance service for the transportation of contaminated persons. Injured personnel are evaluated for radiological contamination using contamination control practices to transport to a medical facility per radiation protection procedures. Xcel Energy personnel will assist with decontamination of transport vehicles if necessary. Ambulance services are described in the site-specific annexes.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
444.	**6.6.3 Medical Treatment**		
445.	The Monticello Nuclear Generating Plant has made arrangements for medical services with a local hospital located approximately five miles from the plant in Monticello. In addition, if the response requires additional resources, CentraCare Health -	**Section L.2.b** Arrangements have been made with local hospitals for the medical treatment of contaminated injured personnel. Primary and backup offsite medical facilities to treat contaminated injured personnel are described in the site-specific annexes **Monticello Annex, Section L.4** Arrangements for transportation of radiologically contaminated casualties have been made with the CentraCare Health-Monticello Ambulance Service.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
446.	Monticello will utilize existing mutual aid and transfer agreements with hospitals appropriate to patient needs and acuity.	**Monticello Annex, Section L.2.b** The primary and backup offsite medical facilities to treat contaminated injured personnel from MNGP are: Primary – CentraCare Health-Monticello Backup – CentraCare St. Cloud Hospital	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
447.	Injured personnel who must be moved to the local hospital while in a contaminated condition SHALL be accompanied by personnel who are qualified in radiological monitoring who will stay in attendance and maintain radiological control until decontamination is satisfactorily completed.	**Section L.2.c** Xcel Energy personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Hospitals are equipped and hospital personnel trained to address contaminated injured individuals and basic training on the nature of radiological emergencies. Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
448.	The person escorting the patient will take along survey instruments. In addition, DLR badges, self reading dosimeters, survey instruments and other supplies and protective equipment for hospital employees are available at the local hospital. For definitive care hospitals, equipment is maintained in the definitive care emergency kit.	No equivalent statement	Plan Language has been aligned to the elements contained in Section L Medical and Public Health Support. The provisions include equipment and capabilities to respond to contaminated injured personnel. The Plan aligns to the commitment to support the capability. Language related to specific treatment has been eliminated to procedural level.
449.	The patient will be put in a separate room and this will be considered a Contaminated Area. Upon release of the patient from the room, it SHALL be sealed until decontaminated and cleared by Radiation Protection. All hospital equipment in the room will be surveyed and decontaminated to site guidelines for release of equipment to a clean area before being released.	No equivalent statement	The Plan retains the commitment to have the capability and related offsite support agreements. Subsequent handling at the offsite facility is managed by that facility and not the Emergency Plan.
450.	If deemed necessary patients may be sent to another hospital for radiological studies, or other reasons.	No equivalent statement	The Plan retains the commitment to have the capability and related offsite support agreements. Subsequent handling at the

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
			offsite facility is managed by that facility and not the Emergency Plan.
451.	This arrangement is formalized in a LOA with CentraCare Health - Monticello and St. Cloud Hospital (CentraCare).	**Monticello Annex, Section A.4,** Site specific Letters of Agreement (LOAs) are maintained by Xcel Energy with the following organizations: • GE Hitachi Nuclear Energy (GEH) • CentraCare – Monticello (CC-M) • CentraCare St. Cloud Hospital (SCH) • Sherburne County Sheriff's Department and Emergency Services Division • Wright County • City of Monticello	The Plan standardizes the language between the three existing Plans without change in practice or intent.
452.	**7.0 EMERGENCY FACILITIES AND EQUIPMENT**		
453.	**7.1 Emergency Response Centers**		
454.	Plan views of the Technical Support Center, Back-up Operations Support Center, Emergency Operations Facility (EOF) and Operations Support Center (OSC) as described below, are shown in Figures 13.4, 13.5, and 13.7.	No equivalent statement	Standard Plan describes the facilities via text documenting capabilities rather than providing a figure.
455.	**7.1.1 Technical Support Center**		
456.	The Technical Support Center (TSC) serves as a center outside of the Control Room that acts in support of the command and control function. Plant status and diagnostic information will be available at this location for use by technical and management personnel in support of reactor command and control functions. The Emergency Director resides in the TSC when activated.	**Section H.1** The TSC provides a location to house personnel who are responsible for management and technical support of plant operations during emergency conditions. The TSC also functions to relieve the on-shift personnel of peripheral duties and communications not directly related to reactor system manipulations and preventing congestion in the MCR.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
457.	The TSC is located on the first level of the Plant Engineering Building (PEB). The TSC has approximately 5700 sq ft of floor space and is within the controlled ventilation boundary of the Emergency Ventilation System (EVS). This system is independent of the Emergency Filtration Train System (EFT) which serves the Control Room.	**Monticello Annex, Section H.1** The Technical Support Center (TSC) is located on the first level of the Plant Engineering Building (PEB). The MNGP TSC has the following capabilities: • Working space for about twenty-five people which is approximately 5700 sq ft of floor space. • Shielding, filtered ventilation, and access to thyroid blocking agents to provide habitability under accident conditions. • Area radiation and continuous airborne monitors are provided to monitor radiological conditions in the facility. • Primary and backup communication links to onsite and offsite emergency response centers. • Access to plant procedures, documents, and records. The capability to record and display plant system, radiological, and meteorological parameters	The specific description of the Monticello TSC was relocated to the Monticello Annex of the Plan without change in practice or intent.
458.	An emergency equipment locker located in the TSC contains protective, anti-contamination clothing for TSC personnel.	**Section J.5** Each site maintains an inventory of equipment and potassium iodide (KI) available for use by emergency workers. The Emergency Director has the responsibility for approval of issuing KI to site emergency workers.	The Plan retains the commitment to provide protective equipment for onsite personnel.
459.	**7.1.2 Operations Support Center**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
460.	The Operational Support Center (OSC) serves as the facility to which Mechanical, Electrical and I&C maintenance personnel report in an emergency. In addition to maintenance personnel, off-duty Operations personnel also report to the OSC. The OSC functions as the staging area from which emergency teams are dispatched, by the TSC or Control Room, to undertake emergency corrective actions.	**Section H.2** The OSC provides a location where plant maintenance, operations, radiation protection and other plant emergency support personnel will assemble and stand by to assist as needed. Each Xcel Energy site has an OSC that provides an area for coordinating and planning event response activities and for staging personnel and equipment.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
461.	The primary OSC is located on the first and second levels of the Plant Administration Building, PAB2 conference room, I&C offices, Operations Department Break Room and Plant Lunch Room. The primary OSC is a dedicated facility which serves as a maintenance support area and conference room during normal operation. The primary OSC is outside a filtered ventilation boundary.	**Monticello Annex, Section H.2** The Operational Support Center (OSC) is located in designated areas on the first and second levels of the Plant Administration Building and is provided with the necessary equipment and communication links to support OSC emergency response actions.	The specific description of the Monticello OSC was relocated to the Monticello Annex of the Plan without change in practice or intent.
462.	The Back-up OSC is located within the TSC shell structure in the east end of the TSC. The Back-up OSC is located within the EVS controlled ventilation boundary. The Back-up OSC is activated if the primary OSC becomes uninhabitable or as other circumstances dictate.	**Section H.4** An Alternative Emergency Facility for staging of ERO personnel has been designated for each Xcel Energy nuclear site and serves as a location for TSC and OSC personnel should those facilities become uninhabitable or in the cases where the facilities cannot be access such as a hostile action or natural disaster. **Monticello Annex H.4** The MNGP Training Building has been designated as the MNGP alternative facility.	The Plan eliminates specification of an onsite Back-up OSC. Relocation of onsite personnel should the primary OSC become unusable requires minimal communication capability to the CR and/or TSC and can be determined based on the conditions present causing the need to evacuate the primary OSC. Monticello in response to the November 2011 Enhanced EP Rulemaking established alternative facilities, in this case, in the Training Building, meeting the requirements should response to the site facility be deemed unsafe.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
463.	Emergency equipment lockers, located in the primary OSC, contain protective anti-contamination clothing for OSC emergency team personnel.	**Section J.5** Each site maintains an inventory of equipment and potassium iodide (KI) available for use by emergency workers. The Emergency Director has the responsibility for approval of issuing KI to site emergency workers.	The Plan retains the commitment to provide protective equipment for onsite personnel.
464.	**7.1.3 Emergency Operations Facility**		
465.	In the event of an Alert, Site Area Emergency, or a General Emergency, the Emergency Operations Facility (EOF) will be activated. The EOF serves as a center for evaluation and coordination of off-site activities related to the emergency. Additionally, the facility will be the base of operations for environmental surveillance and communications with supporting operations. The Emergency Manager is in charge of the EOF.	**Section H.3** The EOF is a dedicated facility located in conjunction with Xcel Energy's general offices in Minneapolis and serves as the EOF for Xcel Energy nuclear sites. Access to the EOF is controlled using electronic card readers.	The Standard Plan proposes a consolidated EOF covering both Prairie Island and Monticello sites. Enclosure 4 of this document provides justification for NRC approval of the proposal in accordance with the requirements for an EOF located beyond 25 miles from the site.
466.	The EOF is located within the site Training Center, 1 mile south by southeast of the plant (approximately 5 minutes driving time). It was designed primarily as a training facility and also in accordance with NUREG 0696. In the event the EOF is needed, it is capable of prompt conversion from a training facility to an Emergency Response Facility.	**Monticello Annex, Section H.3.a**The MNGP Training Building has been designated for use as a near site location for the NRC and other off-site agency staff. This location provides space for an NRC site team and federal/state/local responders, space for conducting briefings with emergency response personnel, communication with other licensee and offsite emergency response facilities and access to copying equipment and office supplies.	The Standard Plan proposes a consolidated EOF covering both Prairie Island and Monticello sites. Enclosure 4 of this document provides justification for NRC approval of the proposal in accordance with the requirements for an EOF located beyond 25 miles from the site.
467.	The EOF will be activated and staffed by Site ERO personnel. The Emergency Plan Implementing Procedures describe the functions, equipment and personnel responsibilities more fully.	No equivalent statement	The Standard Plan proposes a consolidated EOF covering both Prairie Island and Monticello sites. Enclosure 4 of this document provides justification for NRC approval of the proposal in accordance with the requirements for an EOF located beyond 25 miles from the site.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
468.	The EOF will also provide office space, trailer space and communications hook-ups for NRC Incident Response Teams, vendors, and technical support contractors. Media personnel may be assembled in the Training Center Multi-Purpose Room or other designated waiting area. The JIC will be the main point of contact for the media to obtain information regarding the emergency.	**Section H.3.a** The EOF is greater than 25 miles from MNGP and PINGP. Xcel Energy maintains space for members of an NRC Site Team and federal responders at a location near those sites. The location and provisions of the near-site facilities is described in the site-specific annexes.	The Standard Plan proposes a consolidated EOF covering both Prairie Island and Monticello sites. Enclosure 4 of this document provides justification for NRC approval of the proposal in accordance with the requirements for an EOF located beyond 25 miles from the site.
469.	The EOF has facilities and capabilities for: • Management of overall licensee emergency response, • Coordination of radiological and environmental assessment, • Determination of recommended public protective actions, • Notification of offsite agencies, • Coordination of event, plant, and response information provided to public information staff for dissemination to the media and public, • Staffing and activation of the facility within time frames and at emergency classification levels defined in the emergency plan, • Coordination of emergency response activities with Federal, State, and local agencies,	**Section H.3** The EOF has the capability to display vital plant data and radiological information for each site and unit, in near real time, to be used by knowledgeable individuals responsible for providing technical briefings on plant conditions, event prognosis, and for management of overall emergency response. The EOF provides reliable voice communications to each site's MCR, TSC, OSC, the NRC, and state and county warning points and EOCs.	The Standard Plan proposes a consolidated EOF covering both Prairie Island and Monticello sites. Enclosure 4 of this document provides justification for NRC approval of the proposal in accordance with the requirements for an EOF located beyond 25 miles from the site.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
470.	Obtaining and displaying key plant data and radiological information, and • Analyzing plant technical information and providing technical briefings on event conditions and prognosis to licensee staff and offsite agency responders.	**Section H.3** The EOF has the capability to display vital plant data and radiological information for each site and unit, in near real time, to be used by knowledgeable individuals responsible for providing technical briefings on plant conditions, event prognosis, and for management of overall emergency response.	The Standard Plan proposes a consolidated EOF covering both Prairie Island and Monticello sites. Enclosure 4 of this document provides justification for NRC approval of the proposal in accordance with the requirements for an EOF located beyond 25 miles from the site.
471.	**7.1.4 Alternative Facilities**		
472.	In the case of Hostile Action Events activation of onsite Emergency Response Facilities may be unsafe. Alternative Response Facilities have been developed to allow onsite ERO personnel to muster is a location near the site but away from any onsite hostile activity. The alternative facility selected for Monticello is the EOF/Training Building described in Section 7.1.3. This facility is accessible in the event of an onsite Hostile Action and provides the ability to perform the following functions: • Communication with the Control Room and onsite Security Forces • Notification of offsite Emergency Response Organizations • Engineering Assessment Activities including damage control team preparation and planning.	**Section H.4** An Alternative Emergency Facility for staging of ERO personnel has been designated for each Xcel Energy nuclear site and serves as a location for TSC and OSC personnel should those facilities become uninhabitable or in the cases where the facilities cannot be access such as a hostile action or natural disaster. The location of the Alternative Emergency Facility for each site is provided in the site-specific annexes. **Monticello Annex, Section H.4** The MNGP Training Building has been designated as the MNGP alternative facility.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
473.	**7.1.5 Back-up EOF**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
474.	In the event the primary EOF becomes uninhabitable during a real emergency, the functions of the EOF would be transferred to the Back-up EOF. The Back-up EOF is located at the Xcel Energy corporate office in downtown Minneapolis, 45 miles southeast of plant.	No equivalent statement	The Standard Plan proposes a consolidated EOF covering both Prairie Island and Monticello sites. Enclosure 4 of this document provides justification for NRC approval of the proposal in accordance with the requirements for an EOF located beyond 25 miles from the site.
475.	The Back-up EOF has facilities and capabilities for: • Management of overall licensee emergency response, • Coordination of radiological and environmental assessment • Determination of recommended public protective actions • Notification of offsite agencies • Coordination of event, plant, and response information provided to public information staff for dissemination to the media and public, • Coordination of emergency response activities with Federal, State, and local agencies, • Obtaining and displaying key plant data and radiological information, and • Analyzing plant technical information and providing technical briefings on event conditions and prognosis to licensee staff and offsite agency responders.	No equivalent statement	The Standard Plan proposes a consolidated EOF covering both Prairie Island and Monticello sites. Enclosure 4 of this document provides justification for NRC approval of the proposal in accordance with the requirements for an EOF located beyond 25 miles from the site.
476.	**7.1.6 Assembly Points**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
477.	In the event of a plant evacuation, the On-Site Assembly Point (or an Off Site Assembly Point, as appropriate) will be activated. The function of the assembly point is to provide a center for personnel accountability and radiological contamination screening along with any other immediately necessary actions.	**Section J.1.a** Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager. Transportation offsite includes use of personnel vehicles and company vehicles if needed.	The Plan standardizes the language between the three existing Plans without change in practice or intent. Section J.1.a specifically addresses SAE and GE actions.
478.	The On-Site Assembly Point is located approximately 1000 feet south of the plant, within the Site Administration Building. The location of the Off-Site Assembly Point is dependent upon the nature of the emergency conditions. Its location will be announced over the public address system when announcement of evacuation is made.	**Section J.1.a** Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager. Transportation offsite includes use of personnel vehicles and company vehicles if needed.	The Plan standardizes the language between the three existing Plans without change in practice or intent. Section J.1.a specifically addresses SAE and GE actions.
479.	**7.1.7 Access Control**		
480.	The Primary Access Control Point is located in the lower level of the Plant Administration Building. This is the primary entry/exit point from the Radiologically Controlled Area.	No equivalent statement	NUREG-0654, Revision 2, focuses on the performance of EP functions. Those functions controlled under the auspices of other site processes Plans were removed from the document. Access control is managed through Plant RP Procedures.
481.	An alternate Access Control Point will be located in the Administration Building, Security Access Facility, or at a point designated by the ED, if the Primary Access Control Point becomes uninhabitable due to high radiation or high airborne levels.	No equivalent statement	NUREG-0654, Revision 2, focuses on the performance of EP functions. Those functions controlled under the auspices of other site processes Plans were removed from the document. Access control is managed through Plant RP Procedures.
482.	**7.1.8 Sign-in Boards for ERO Assignments**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
483.	The boards are used to make speedy personnel duty assignments during the initial stage of an emergency, to insure that qualified personnel fill the positions in the ERO, and insure that the more important positions in the ERO are filled first.	No equivalent statement	The Plan retains commitment to maintain ERFs and their respective capabilities. Sign-in boards or future changes in methodology of people management within those facilities have been relocated to implementing procedures.
484.	The board consists of a layout of the Emergency Response Organization. Under the board is a list of the individuals who are qualified to fill that position.	No equivalent statement	The Plan retains commitment to maintain ERFs and their respective capabilities. Sign-in boards or future changes in methodology of people management within those facilities have been relocated to implementing procedures.
485.	The boards are located in each facility. Personnel who have key positions within those facilities have the responsibility of checking the boards when it is announced that ERO personnel are to report to their duty stations. The boards are reviewed and updated quarterly.	No equivalent statement	The Plan retains commitment to maintain ERFs and their respective capabilities. Sign-in boards or future changes in methodology of people management within those facilities have been relocated to implementing procedures.
486.	**7.2 Communications Systems**		
487.	**7.2.1 Normal On-Site Communications**		
488.	Normal on-site communications is provided by the plant telephone system which has a maximum capacity of 36,000 lines and 12,000 trunks. The telephone system processing equipment located in the Plant Administration Building telephone room and the Plant Engineering Building communication room is powered by UPS/battery backed non-1E instrument buses.	**Section F.1.a** Xcel Energy nuclear sites maintain the capability to perform emergency communications, notifying NRC and OROs, and activating the ERO. Communication systems are designed to facilitate normal and emergency communications within the plant, between the plant and emergency facilities, and between the plant and NRC and OROs. Redundant systems are provided to ensure continuous communications between entities and personnel.	The Plan retains commitment to maintain Communication capabilities required to support implementation of the Emergency Plan.

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489.	Portions of the system are also provided with an alternative power source from lighting panels backed by the non-1E Diesel Generator. Telephone system components at remote locations are powered from lighting panels backed by stand-alone UPSs.	**Section F.1.a** At least one system used for on-site communications and one system used for offsite communications is maintained with an alternate power source to ensure continuous availability.	The Plan retains commitment to maintain Communication capabilities required to support implementation of the Emergency Plan.
490.	The plant PA System may also be used for in-plant communications. The PA System is powered by normal plant power, backed up by uninterruptible power.	**Section F.1.a** Site communications capabilities are described in the site-specific annexes. **Monticello Annex, Table F.1.b, MNGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.
491.	Portable radios are used for communications between individuals and base stations located in the Control Room, TSC, EOF, and Security Building.		
492.	**7.2.2 Normal Off-Site Communications**		
493.	Normal off-site communications is provided by the following telephone circuits:	**Monticello Annex, Table F.1.b, MNGP Communications Matrix**	Standard Plan focuses on the Communications capabilities intended for use when the Plan is implemented. 'Normal' communications are not discussed.
494.	**7.2.2.1** 46 two way ISDN trunks (TDS Telecom)	No equivalent statement	Standard Plan focuses on the Communications capabilities intended for use when the Plan is implemented. 'Normal' communications are not discussed.
495.	**7.2.2.2** 46 two way ISDN trunks to Minneapolis (Dial 8 access)	No equivalent statement	Standard Plan focuses on the Communications capabilities intended for use when the Plan is implemented. 'Normal' communications are not discussed.
496.	**7.2.2.3** 23 ISDN trunks to the Monticello Training Center	No equivalent statement	Standard Plan focuses on the Communications capabilities intended for use when the Plan is implemented. 'Normal' communications are not discussed.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
497.	**7.2.3** Alternate Off-Site Communications	**Monticello Annex, Table F.1.b, MNGP Communications Matrix**	Standard Plan focuses on the Communications capabilities intended for use when the Plan is implemented. 'Normal' communications are not discussed.
498.	**7.2.3.1 Radio Receiver/Transmitter**		
499.	An alternate method for communications is provided by an AC powered radio transceiver with control consoles located in the TSC, Control Room and EOF.	**Monticello Annex, Table F.1.b, MNGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.a.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications include Attachment 5 documenting specifically the Communication Methods and Interfaces.
500.	From either console, communications may be established with the EOF, Sherburne and Wright County Sheriffs, Plant Security, Operations and Radiation Protection portable radios, and the Xcel Energy System Control Center.	**Monticello Annex, Table F.1.b, MNGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.a.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications include Attachment 5 documenting specifically the Communication Methods and Interfaces.
501.	**7.2.3.2** Emergency Response Organization Pager Network		
502.	An ERO Pager Network is utilized for notification of site Emergency Response Organization members. The system consists of a commercial pager network with independent, transmitters.	**Section F.1.c** Xcel Energy sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	Standard Plan commits to the maintenance of an automated system without specifying methodology to permit use of rapidly emerging technologies.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
503.	Transmitters are located in various areas from St. Cloud to Red Wing. Each pager group has a primary and back-up telephone number which are from separate trunk lines, which further increases accessibility. Each transmitter is installed with a back-up power supply (battery or diesel).	**Section F.1.c** Alternate methods of ERO notification are in place via individual callouts of personnel utilizing any of the various calling methods available.	Standard Plan commits to the maintenance of an automated system without specifying methodology to permit use of rapidly emerging technologies.
504.	**7.2.3.3 Direct Dedicated Telephones**		
505.	Direct dedicated telephones as described below are diagrammed in Figure 13.6.	**Monticello Annex, Table F.1.b, MNGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.a.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications include Attachment 5 documenting specifically the Communication Methods and Interfaces.
506.	**7.2.3.3.1 Three dedicated lines exist between the TSC and the EOF.**	**Monticello Annex, Table F.1.b, MNGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.a.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications include Attachment 5 documenting specifically the Communication Methods and Interfaces.
507.	**7.2.3.3.2** Site FTS System – this dedicated telephone network connects the plant site with the NRC Operations Center. Site extensions are located in the Control Room, TSC, Duty Shift Manager Office and Site NRC Office. Site extensions include ENS, HPN, and various other extensions connecting to the NRC Operations Center.	**Section F.1.b** Telephones have been designated for the following NRC communications: • NRC Emergency Notification System (ENS) – This communications line provides a link to the NRC Operations Center in Rockville, Maryland, and is used for initial notifications and continuous communications in a classified emergency. • NRC Health Physics Network (HPN) – This communications line provides a link	Standard Plan maintains the commitment to provide phones to support NRC response communications. Specific commitment to FTS system is not listed to permit flexibility as described as discussed in previous NRC Generic Communications.
508.	**7.2.3.3.3** EOF FTS System – this dedicated telephone network connects the EOF with the NRC Operations Center. EOF extensions are located in the EOF		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
	and adjoining classrooms. EOF extensions include ENS, HPN and various other extensions connecting to the NRC Operations Center.	with the NRC to provide radiological information. • NRC Reactor Safety Counterpart Link (RSCL) – This communications line provides a link for the NRC to conduct internal NRC discussions on plant equipment conditions separate from the licensee.	
509.	**7.2.3.3.3** EOF FTS System – this dedicated telephone network connects the EOF with the NRC Operations Center. EOF extensions are located in the EOF and adjoining classrooms. EOF extensions include ENS, HPN and various other extensions connecting to the NRC Operations Center.	**Section F.1.b** • Protective Measures Counterpart Link (PMCL) – This communications line provides a link for the NRC to conduct internal NRC discussions on radiological releases, meteorological conditions, and the need for protective actions.	Standard Plan maintains the commitment to provide phones to support NRC response communications. Specific commitment to FTS system is not listed to permit flexibility as described as discussed in previous NRC Generic Communications.
510.	**7.2.3.3.3** EOF FTS System – this dedicated telephone network connects the EOF with the NRC Operations Center. EOF extensions are located in the EOF and adjoining classrooms. EOF extensions include ENS, HPN and various other extensions connecting to the NRC Operations Center **(continued)**	**Section F.1.b** • Management Counterpart Link (MCL) (Executive Bridge Line) – This communications line provides a communications link for any NRC internal discussions between the NRC Executive Team Director or Executive Team members and the NRC response team leader or top-level licensee management at the site. • Security Bridge – This communications line provides a link to the NRC Security bridge Line for discussions between the NRC, site and EOF personnel.	Standard Plan maintains the commitment to provide phones to support NRC response communications. Specific commitment to FTS system is not listed to permit flexibility as described as discussed in previous NRC Generic Communications.
511.	**7.2.3.3.4** An automatic-ringing line exists between the TSC and the State EOC.	**Monticello Annex, Table F.1.b, MNGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.a.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications include Attachment

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
			5 documenting specifically the Communication Methods and Interfaces.
512.	**7.2.3.3.5** Two dedicated lines exists between the EOF and the Back up EOF.	**Monticello Annex, Table F.1.b, MNGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.a.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications include Attachment 5 documenting specifically the Communication Methods and Interfaces.
513.	**7.2.3.3.6** An auto ring line exists between the EOF and the State EOC.	**Monticello Annex, Table F.1.b, MNGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.a.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications include Attachment 5 documenting specifically the Communication Methods and Interfaces.
514.	**7.2.3.3.7** Four dedicated Federal Telephone System (FTS) lines exists in both the EOF and TSC to connect the NRC incident response team with the NRC Operations Center.	**Monticello Annex, Table F.1.b, MNGP Communications Matrix** Row 2, Columns 4, 11, 12, 13 Row 4, Columns 11.12.13	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.a.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications include Attachment 5 documenting specifically the Communication Methods and Interfaces.
515.	**7.2.3.3.8** Two dedicated cellular phones providing back-up communications for Field Teams.	**Section F.1.b** Alternate Methods of Communication • Mobile Devices	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.a.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications include Attachment 5 documenting specifically the Communication Methods and Interfaces.
516.	**7.2.3.4 Radio Links**		
517.	Radio links exist for communications between the Minnesota Division of Homeland Security and Emergency	**Monticello Annex, Table F.1.b, MNGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
	Management and the Control Room, TSC, EOF, and Back-up EOF at the plant site.		are incorporated into Site Specific Annex Table F.a.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications include Attachment 5 documenting specifically the Communication Methods and Interfaces.
518.	**7.2.3.5 Emergency Response Data System**		
519.	ERDS is a direct near real-time electronic data link between the plant's on-site computer system and the NRC Operations Center that provides for the automated transmission of a limited data set of selected parameters. The ERDS supplements the existing voice transmission over the FTS-ENS.	**Section H.10** The ERDS will supply the NRC with selected meteorological data points on a near real time basis. The selected ERDS data points are transmitted via Virtual Private Network (VPN) to the NRC at approximately 1-minute intervals.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
520.	**7.2.4 Emergency Communications Matrix**		
521.	Tables 6 and 7 depict the different communications media by which emergency centers pass information, and give primary and alternate contacts for centers where appropriate.	**Monticello Annex, Table F.1.b, MNGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.a.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications include Attachment 5 documenting specifically the Communication Methods and Interfaces.
522.	**7.2.5 Testing**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
523.	Testing of the various communications links is accomplished in two ways.	**Section F.3** Communications tests will be conducted and documented on the frequency specified below. The tests include provisions to ensure participants in the test are able to understand the content of the messages in the test. • Systems used to communicate with state and county government warning points within the plume exposure pathway EPZ will be tested monthly. • Systems used to communicate from the MCR, TSC, and EOF to NRC Headquarters and NRC Regional Office Operations Center are tested monthly. • Systems used to communicate with state and county government EOCs are tested annually.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
524.	Testing of the various communications links is accomplished in two ways. (continued)	**Section F.3** • Systems used to communicate between Xcel Energy ERFs, and from the applicable ERF to the FMTs, are tested annually. • Systems used to communicate with Federal emergency response organizations are tested annually. • The ERDS is verified as connected and transmitting data on a quarterly basis.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
525.	**7.2.5.1** Each month a communications test is conducted in accordance with a surveillance procedure (1225).		
526.	**7.2.5.2** Drills involving communications equipment are conducted on a regular basis to assure operability.		
527.	**7.3 Assessment Facilities**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
528.	The plant instrumentation and monitors perform indicating, recording and protective functions. The regulating systems provide the ability to regulate the plant safely from shutdown to full power and to monitor and maintain key variables such as reactor power, flow, temperature and radioactivity levels within predetermined safe limits during both steady state and plant transients. Plant instrumentation and control systems also provide means to cope with abnormal operating conditions. The control and display of information of these various systems are centralized in the main Control Room. This instrumentation would provide the basis for initiation of protective systems.	**Section H.8** **Seismic Monitoring** Seismic information from offsite sources can be obtained from the National Earthquake Information Center. A considerable array of seismometers is in the region. A central point of contact to obtain information about a seismic event is the USGS in Reston, Virginia. **Radiological Monitoring** Offsite programs and processes are developed within the Radiological Environmental Assessment Program (REMP) at each site as described in the site-specific Offsite Dose Calculation Manual (ODCM).	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
529.	**7.3.1 On-Site Systems and Equipment**		
530.	**7.3.1.1 Safety Parameter Display System (SPDS)**		
531.	The Safety Parameter Display System (SPDS) is an integrated function of the Plant Process Computer System (PPCS); and is designed to provide plant operators with a concise display of critical plant parameters as an aid in implementation of the plant Emergency Operating Procedures (EOPs). The Monticello SPDS is based on plant Emergency Operating Procedures (EOPs) and General Electric (GE) generic Emergency Response Information System (ERIS).	**Section H.7** A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities. Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
532.	PPCS displays are available in the Work Execution Center Office, Duty Shift Manager Office, Technical Support Center (TSC), Emergency Operations Facility (EOF) and throughout the Control Room. The PPCS terminals in the TSC include one for Radiation Protection Group use and one for Technical Engineering use.	**Section H.7** A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities. Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
533.	SPDS information is presented to the operator via color graphic computer system monitors. Operator interface to the computer system is via keyboards, mice, monitors, and printers. Input data from plant sensors is gathered via the Data Acquisition System (DAS) and interfaced to the PPCS, which supports the various SPDS displays. Signals are processed through various algorithms such as signal range checking, limit checking, averaging, logical manipulations and validation.	**Section H.7** A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities. Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
534.	The results are then made available on the SPDS displays.	**Section H.7** A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities. Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
535.	The SPDS displays can be classified into two categories, Top-Level and Lower-Level displays. In general, Top-Level displays provide information on several control parameters, both current and historical. The Lower-Level displays are designed to augment the Top-Level displays by providing more detail or background on specific items contained in the Top-Level displays. The overall SPDS display structure is as follows:	**Section H.7** A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities. Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
536.	**7.3.1.1.1 Top Level SPDS Displays**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
537.	1. Critical Plant Variables (000) The CPV display provides the status of all critical plant parameters including RPV level, pressure, reactor power, drywell pressure and temperature, torus pressure, temperature and level, and radioactive release rate information. 2. Reactor Pressure Vessel Control (011) The RPV display provides detailed status and control parameter information including RPV water level, RPV pressure, reactor power and RPV temperature. 3. Containment Control (021) This display provides specific information regarding containment control including drywell pressure and temperature and torus water level, temperature and pressure.	**Section H.7** A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities. Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
538.	4. H2/O2 Control (022) This display provides the hydrogen and oxygen concentrations in containment. 5. Radiation Control (1110-113) **7.3.1.1.2** The Radiation Monitor displays provide detailed information on Reactor/Turbine and Radwaste Building area radiation monitors and plant process monitors	**Section H.7** A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities. Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
539.	**7.3.1.1.3 Lower-Level SPDS Displays**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
540.	1. Trend Plot Displays Trend plot displays support the RPV and Containment Control displays by providing detailed parameter trend plots of those displays. 2. Validation Displays The Validation displays are used to display how a parameter is determined. 3. Two Dimensional Plot Displays The 2-D plot displays provide plant specific two dimensional limits in an x–y format and are identical to the curves used in the EOPs.	**Section H.7** A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities. Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
541.	In addition, Menu Displays are provided to assist the user in selection of individual displays from applicable display types. The following Menus are available: SPDS, Trend Plot, Validation, and 2D Plot.	**Section H.7** A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities. Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
542.	The SPDS displays are designed with common display characteristics for ease of understanding. Data is displayed according to defined conventions for use of color, shape, format, alarm and validation processing.	**Section H.7** A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities. Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
543.	A display color coding scheme is used to aid the operator in prioritizing information and recognizing off-normal conditions. In addition, displays provide indication of both validated parameter and process limit status. Status windows are also provided to alert the operator when approaching or exceeding a critical parameter limit (EOP entry condition).	**Section H.7** A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities. Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
544.	**7.3.1.2 Geophysical Phenomena Monitors**		
545.	**7.3.1.2.1 Seismic Monitoring System**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
546.	The Seismic Monitoring System is made up of three independent sensing systems: the peak recording accelerometers, the seismic switch activated annunciator system and the accelerograph recording system. The peak recording accelerometers and the sensors for the accelerograph system (force balance accelerometers) are located in the drywell, on the refueling floor and in the seismic shed (located to the north of the number 2 warehouse). Seismic switches for the annunciator system are also located in the seismic shed. The seismic trigger which initiates the accelerograph is located in the number 12 125 VDC Battery Room.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM). **Section H.8** **Seismic Monitoring** Seismic information from offsite sources can be obtained from the National Earthquake Information Center. A considerable array of seismometers is in the region. A central point of contact to obtain information about a seismic event is the USGS.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
547.	Each of the peak recording accelerometers is a self contained unit. The sensing mechanism is a permanent magnet stylus attached to the end of a torsional accelerometer. Low frequency accelerations cause the magnet to erase pre recorded lines on a small (approximately 1/4 inch square) piece of magnetic tape. Each peak recording accelerometer unit contains three torsional accelerometers and magnetic tapes - one each for longitudinal, transverse, and vertical accelerations.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
548.	The magnetic tapes can be removed from the accelerometers, developed and evaluated by plant personnel for a rapid determination of the severity of a seismic disturbance.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
549.	The Control Room annunciator 6-C-08 (EARTHQUAKE) is initiated by either seismic switch of the Seismic Annunciator System or the seismic trigger of the accelerograph recording system. In addition to this, each of the seismic switches has its own alarm. The first of these is the alarm 6-C-13 (OPERATIONAL BASIS EARTHQUAKE (OBE)) which annunciates when its switch senses an acceleration ≥ .03 g.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
550.	The second alarm is the 6-C-18 (DESIGN BASIS EARTHQUAKE (DBE)), which annunciates when its switch senses an acceleration ≥.06g. These two switches do not activate the accelerograph recording system.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
551.	The accelerograph recording system gives a more detailed record of a disturbance than the peak recording accelerometers – it records accelerations in three directions (longitudinal, transverse, and vertical, as above) from each of the three sensor locations on magnetic tape cartridges located in the Control Room. This system has five major components: a trigger, three sensors, and the recording and control units. When the trigger (located in the No. 12 125 VDC Battery Room) senses the beginning of a seismic disturbance, (an acceleration > .01 g), it will start the accelerograph recorders and also triggers the earthquake event alarm 6-C-08 in the Control Room.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
552.	A summary of the Seismic Monitoring Equipment is provided in Table 8.	No equivalent statement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
553.	**7.3.1.2.2 Meteorological Monitoring System**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
554.	The purpose of the meteorological monitoring system is to monitor and determine atmospheric dilution and dispersion parameters for the Monticello Plant site.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM). **Section H.8** **Meteorological Monitoring** Meteorological information from offsite sources can be obtained from the National Weather Service. Xcel Energy can contact the National Weather Service to obtain additional synoptic scale weather data and compile a site-specific atmospheric diffusion assessment for each Xcel Energy site.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
555.	The meteorological monitoring system consists of two instrumented towers, associated signal transmission and data processing equipment, and associated power supplies.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with theirs USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
556.	The primary meteorological tower facility is located on the plant site, east of the Reactor Building. It has a 100 meter guyed steel tower and several enclosures mounted to an H-Frame at the base of the tower. There is a motor driven elevator for each train with three separate instrument platforms mounted on the tower. The platforms are spaced at 10 meters (ground), 43 meters (vent), and 100 meters (stack).	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
557.	Two complete sets of instruments are divided into two independent signal trains, A and B allowing each train of equipment to operate independently so maintenance may be performed without taking both trains out of service.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
558.	Each train is comprised of three wind speed and direction transmitters, three RTD temperature probes housed in a forced air/shield aspirator, one heated precipitation sensor, and one relative humidity probe. All of the signals from the tower are fed to the instrument processor rack located in the H-Frame enclosures. The majority of instrumentation is powered from a local UPS. Data is collected, processed, and then communicated from the tower to a receiver inside the Plant Administration Building.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
559.	Meteorological data is available on the Process Computer System in the Plant Control Room, TSC, and the EOF. A meteorological data recorder is also provided in the control room.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
560.	A backup meteorological tower is located approximately 3/4 mile from the Reactor Building and is located within the Training Center site. This tower is a 22 meter self-supported tower with an instrument elevator which lifts single train wind speed and wind direction sensor to the 22 meter elevation. Signals from the tower are fed to an instrument processor rack and provide a backup source of wind speed and wind direction data.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM). **Section H.8** **Meteorological Monitoring** Meteorological information from offsite sources can be obtained from the National Weather Service. Xcel Energy can contact the National Weather Service to obtain additional synoptic scale weather data and compile a site-specific atmospheric diffusion assessment for each Xcel Energy site.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
561.	Meteorological data from the 100 meter tower is collected and a 15 minute running average is calculated every minute. The data is available on the Process Computer System in the Plant Control Room, TSC, and the EOF.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, and plant Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
562.	Meteorological data from the backup tower is collected and a 15 minute running average is calculated every minute. The data is available on the Process Computer System in the Plant Control Room, TSC, and the EOF.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
563.	Displays of 15 minute running average meteorological data from both sensor trains on the 100 meter tower and backup tower are simultaneously available on computer terminals in both the TSC and EOF.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
564.	The Meteorological Data Collection software includes data quality control tests which flag questionable or bad data to the user. Plant Chemistry personnel access hourly averaged data on a daily basis and review the data for reasonableness in accordance with plant Chemistry Department procedures. Plant I&C personnel perform a periodic surveillance test on the 100 meter tower and annual instrument maintenance on both towers in accordance with the plant surveillance program. System problems are corrected through the plant Work Order process.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
565.	In addition to the site meteorological monitoring system, regional meteorological data is available through the National Weather Service by commercial telephone. National Oceanic and Atmospheric Administration (NOAA) Weather Alert radios are also installed in the Control Room, TSC and EOF to provide warning of adverse weather.	**Section H.8** **Meteorological Monitoring** Meteorological information from offsite sources can be obtained from the National Weather Service. Xcel Energy can contact the National Weather Service to obtain additional synoptic scale weather data and compile a site-specific atmospheric diffusion assessment for each Xcel Energy site.	The Standard Plan aligns wording between the three existing plans without change in practice or intent.
566.	**7.3.1.3 Radiological Monitors**		
567.	**7.3.1.3.1 Process Radiation Monitoring System**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
568.	The function of the process radiation monitoring system is to provide a continuous monitoring and readout of the radioactivity of all process lines and vents that can release radioactivity directly to the environs.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
569.	In addition, this system also continuously measures, indicates and records the radioactivity concentration levels of in-plant process streams and vents. A list of the plant process monitors is provided in Table 10.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	
570.	**7.3.1.3.2 Area Radiation Monitoring System**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
571.	A list of the Area Radiation Monitors is provided in Table 11. The functions of the Area Radiation Monitoring System are: 1. Warn of excessive gamma radiation levels in areas where nuclear fuel is stored or handled. 2. Provide operating personnel with a continuous indication in the main Control Room of gamma radiation levels at selected locations within the various plant buildings. 3. Contribute supervisory information to the Control Room so that correct decisions may be made with respect to deployment of personnel in the event of a radiation incident. 4. Assist in the detection of unauthorized or inadvertent movement of radioactive material in the plant including the radwaste area. 5. Supplement other systems including Process Radiation Monitoring, Leak Detection, etc., in detecting abnormal migrations of radioactive material in or from the process streams.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
572.	6. Provide local alarms at key points where a substantial change in radiation level might be of immediate importance to personnel frequenting the area. 7. Maintain a permanent record of the radiation levels in the areas being monitored.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
573.	**7.3.1.4 Process Monitors**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
574.	**7.3.1.4.1** There are many instruments in the plant which may be used to assess the many potential conditions that the plant may experience. These instruments may be used individually or in groups of indicators to assess a certain situation. There is no specific indication that in itself can correctly identify an emergency condition 100% of the time. Therefore, the operators must utilize their general knowledge along with the guidelines provided in Emergency Plan Implementing Procedure A.2 101 (CLASSIFICATION OF EMERGENCIES) to analyze process indications. Specific process monitors of reactor systems which are used during various plant emergencies are discussed in A.2-101. In addition, a summary of the types of measured parameters in the Control Room is provided in Table 12, Instruments Available for Monitoring Major Systems.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
575.	**7.3.1.4.2 Reactor Protection System**		
576.	The Reactor Protection System is designed to prevent, in conjunction with the Primary Containment and Containment Isolation Systems, the release of radioactive materials in excess of the guidelines of 10 CFR 50.67, and to prevent fuel damage as a consequence of single operator error or single equipment failure. When specified limits have been exceeded, the Reactor Protection System initiates a reactor scram.	No equivalent statement	The Reactor Protective System is controlled by Technical Specifications. NUREG-0654, Revision 2, structure to focus the Plan on Emergency Plan functions eliminates the need for this system description.
577.	**7.3.1.4.3 Primary Containment Isolation System**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
578.	The purpose of the Primary Containment Isolation System is to prevent the release of radioactive materials in excess of the guidelines of 10 CFR 50.67 by isolating the reactor vessel and closing containment where required following an accident.	No equivalent statement	The Primary Containment Isolation System is controlled by Technical Specifications. NUREG-0654, Revision 2, structure to focus the Plan on Emergency Plan functions eliminates the need for this system description.
579.	**7.3.1.5 Containment Radiation Monitor**		
580.	There are two containment radiation monitors which have ion chamber detectors and a response range of 100 to 108 R/hr. The detectors are located at approximately the midline of the drywell and separated to enhance the redundant feature of the system. As safety monitors, they satisfy 1E requirements and are qualified under LOCA conditions to IEEE 323-1974. The detectors are encased in steel to protect them from containment sprays and high temperatures.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
581.	In the event of a large release of radioactivity to the containment atmosphere, the containment monitors can be used to estimate the amount of activity available for release from containment.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with theirs USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
582.	**7.3.1.6 Fire Detection Devices**		
583.	**7.3.1.6.1 Early Warning Fire Detectors**		
584.	Fire detectors (smoke, heat, and flame) are located in most areas of the plant. The detectors in each area initiate an alarm locally and in the Control Room upon detecting either combustion or a failure in the detector system. Detectors in certain areas of the plant will activate their respective sprinkler systems.	No equivalent statement	The Fire Protection System is controlled by Technical Specifications and/or the Fire Plan. NUREG-0654, Revision 2, structure to focus the Plan on Emergency Plan functions eliminates the need for this system description.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
585.	**7.3.1.6.2 HAD (Heat Activated Device)**		
586.	The HAD System utilizes the heat from a fire to operate a pneumatic system to either sound alarms or automatically initiate a deluge or sprinkler system. The HAD System is used in conjunction with the building siding deluge, the cooling tower deluges, the recirculation MG set deluges, and the lube oil reservoir deluge. These systems can also be operated locally.	No equivalent statement	The Fire Protection System is controlled by Technical Specifications and/or the Fire Plan. NUREG-0654, Revision 2, structure to focus the Plan on Emergency Plan functions eliminates the need for this system description.
587.	**7.3.1.6.3 LHD (Linear Heat Detection)**		
588.	The LHD utilizes a Protectowire linear heat fire detection system and is capable of initiating an alarm once its rated activation temperature is reached.	No equivalent statement	The Fire Protection System is controlled by Technical Specifications and/or the Fire Plan. NUREG-0654, Revision 2, structure to focus the Plan on Emergency Plan functions eliminates the need for this system description.
589.	**7.3.1.7 Post-Accident Sample System**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
590.	The Post-Accident Sample System (PASS) was designed to provide a means of assessing core damage during and after a loss-of-coolant accident. The facility is located outside of secondary containment to enhance accessibility. Local shielding and area radiation monitoring are also provided to protect the operator. The capabilities of the system include:	**Section I.1.a** The magnitude of a release of radioactive material to the environment is primarily identified directly by effluent monitors. Survey and sample analysis may also be used to determine the magnitude of a release. Indirect means such as core damage estimates and release pathway assumptions may be used to estimate the magnitude of a release of radioactive material. The isotopic composition of a release of radioactive material to the environment may be determined by; (1) specialized gaseous monitors that distinguish between gases, iodines and particulate, (2) survey and sample analysis, or (3) source term estimates based on core damage and release pathway assumptions.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
591.	**7.3.1.7.1 Large and small volume liquid coolant samples from jet pumps A and B and RHR pumps A and B;**		
592.	**7.3.1.7.2 Gas samples from drywell and torus.**		
593.	**7.3.2 Facilities and Equipment for Off-Site Monitoring**		
594.	**7.3.2.1 Geophysical Phenomena Monitors**		
595.	In the event that a seismic disturbance is indicated by on-site detection equipment, plant procedures require the operator to confirm the validity and intensity of the disturbance by contacting an off-site source. The list of off-site sources includes:	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM). **Monticello Seismic EALs (EPLAN-04)**	Emergency Action Levels in the approved EAL scheme drive the response should a detectable seismic activity occur. The Plan retains the commitment for onsite monitoring to support the EALs.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
596.	**7.3.2.1.1 Prairie Island Nuclear Plant (Located near Red Wing, Minnesota);**	**Section H.8** **<u>Seismic Monitoring</u>** Seismic information from offsite sources can be obtained from the National Earthquake Information Center. A considerable array of seismometers is in the region. A central point of contact to obtain information about a seismic event is the USGS.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
597.	**7.3.2.1.2 National Earthquake Information Service (Golden, Colorado)**	**Section H.8** **<u>Seismic Monitoring</u>** Seismic information from offsite sources can be obtained from the National Earthquake Information Center. A considerable array of seismometers is in the region. A central point of contact to obtain information about a seismic event is the USGS.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
598.	**7.3.2.2 Radiological Monitors**		
599.	The Monticello off-site radiation monitoring program includes TLD stations which are located in the general areas of the site boundary, in an outer ring, in special interest areas, and in control stations, many miles from the plant. Also included in the program is a group of air monitoring stations positioned on the site boundary and in the city of Monticello. The program, known as the Radiological Environmental Monitoring Program, is administered at the Site.	**Section H.8** **<u>Radiological Monitoring</u>** Offsite monitoring programs and processes that include the use of fixed dosimetry and air sampling capability, are developed within the Radiological Environmental Assessment Program (REMP) at each site as described in the site-specific Offsite Dose Calculation Manual (ODCM).	The Standard Plan aligns wording between the three existing plans without change in practice or intent.
600.	**7.3.2.3 Laboratory Facilities**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
601.	In the event that the lab facilities on-site become unusable or overloaded, back-up facilities are available. The chemistry labs at Prairie Island are available for chemical analysis work. For radiochemical analysis, the back-up countroom at the EOF is equipped with a computer-based multi-channel analyzer and gross beta counting equipment. The counting facilities at Prairie Island are also available, if needed.	**Section C.4** Contract Laboratories Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide environmental sample analysis services and are listed in the site-specific annexes **Monticello Annex, Section B.5** • GEL Laboratories, LLC: GEL will provide personnel and laboratory support services to MNGP as needed.	The Standard Plan aligns wording between the three existing plans without change in practice or intent.
602.	**7.4 Protective Facilities and Equipment**		
603.	**7.4.1 Assembly Points**		
604.	In the event of a Site Area or General Emergency, the Site Administration Building (SAB) is designated as the assembly point for evacuated personnel. The SAB is located approximately 1000 feet south of the plant.	**Section J.1** Alarms are available for alerting personnel of hazardous conditions such as fire or increasing radiation levels at the site. Site communications methods are available for notification of personnel outside the Protected Area and within the Owner Controlled Area. Instructions are provided to plant personnel that describe the protective action to be taken in each instance.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
605.	This structure offers cover from fallout, but does not have special ventilation or shielding properties. It has the capacity to handle the number of people expected to report there. An emergency equipment locker at the assembly point contains a supply of emergency equipment and protective clothing.	No equivalent statement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
606.	The Receiving Warehouse has been identified as an alternate assembly point for specific events. This facility may be used to relocate and assemble and account for non–essential personnel during security threats.	No equivalent statement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
607.	**7.4. Emergency Operations Facility (EOF)**		
608.	The EOF is located approximately 1 mile southeast of the plant and is activated at the Alert, Site Area or General Emergency classification. The EOF is contained within the site Training Center which houses the Training Staff, administrative offices and Control Room Simulator.	No equivalent statement	The Standard Plan proposes a consolidated EOF used for both Monticello and Prairie Island greater than 25 miles from either site. See Enclosure 4 for the detailed justification for NRC approval of the consolidated EOF.
609.	The EOF was designed and constructed IAW NUREG 0696 and is a concrete structure which contains sufficient shielding (for the EOF section of the building) to provide a protection factor of 5. The EOF portion of the building is served by two independent off-site power sources for reliability.	No equivalent statement	The Standard Plan proposes a consolidated EOF used for both Monticello and Prairie Island greater than 25 miles from either site. See Enclosure 4 for the detailed justification for NRC approval of the consolidated EOF.
610.	The building ventilation system includes an “emergency” mode which provides filtered air to pressurize the EOF through a high efficiency particulate absolute (HEPA) filtration system. The layout of the building entrances and exits were also designed to facilitate emergency operations.	No equivalent statement	The Standard Plan proposes a consolidated EOF used for both Monticello and Prairie Island greater than 25 miles from either site. See Enclosure 4 for the detailed justification for NRC approval of the consolidated EOF.
611.	Radiological monitoring of the EOF is provided by air sampling and Dosimeter Area Radiation Monitor (DARM) which may be supplemented with radiological surveys by the EOF Radiation Protection Staff.	No equivalent statement	The Standard Plan proposes a consolidated EOF used for both Monticello and Prairie Island greater than 25 miles from either site. See Enclosure 4 for the detailed justification for NRC approval of the consolidated EOF.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
612.	Extensive communications equipment is installed to provide primary and back-up methods of communicating with plant Emergency Response Facilities, utility headquarters, off-site agencies and utility Field Monitoring teams. Critical plant parameter data is available in the EOF through the plant Safety Parameter Display System (SPDS).	No equivalent statement	The Standard Plan proposes a consolidated EOF used for both Monticello and Prairie Island greater than 25 miles from either site. See Enclosure 4 for the detailed justification for NRC approval of the consolidated EOF.
613.	Meteorological data is provided by the ERIS system. Off site dose projection is provided by RASCAL.	No equivalent statement	The Standard Plan proposes a consolidated EOF used for both Monticello and Prairie Island greater than 25 miles from either site. See Enclosure 4 for the detailed justification for NRC approval of the consolidated EOF.
614.	**7.4.3 Back-up EOF**		
615.	The Back-up EOF is located at the Xcel Energy corporate office in downtown Minneapolis, 45 miles southeast of the plant.	No equivalent statement	The Standard Plan proposes a consolidated EOF used for both Monticello and Prairie Island greater than 25 miles from either site. See Enclosure 4 for the detailed justification for NRC approval of the consolidated EOF.
616.	In the event the primary EOF became uninhabitable during a real emergency, the functions of the EOF would be transferred to the Back-up EOF.	No equivalent statement	The Standard Plan proposes a consolidated EOF used for both Monticello and Prairie Island greater than 25 miles from either site. See Enclosure 4 for the detailed justification for NRC approval of the consolidated EOF.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
617.	Extensive communications equipment is installed to provide primary and back-up methods of communicating with plant emergency Response Facilities, off-site agencies and utility Field Monitoring teams. Critical plant parameter data is available in the Back-up EOF through the plant Safety Parameter Display System (SPDS). Meteorological data is provided and displayed by the ERIS system. Off site dose projection is provided by RASCAL.	No equivalent statement	The Standard Plan proposes a consolidated EOF used for both Monticello and Prairie Island greater than 25 miles from either site. See Enclosure 4 for the detailed justification for NRC approval of the consolidated EOF.
618.	**7.4.4 Emergency Kits**		
619.	Table 13 lists the location and general contents of emergency kits to be used in response to an emergency at the Monticello Plant.	**Section H.11** In addition to supplies of normal use equipment and instruments, emergency kits are maintained at Xcel Energy nuclear sites. Routine quarterly inventories are performed to verify contents and operationally check equipment/instruments in accordance with site procedures.	The Standard Plan retains the commitment to maintain emergency kits without specifying location.
620.	**7.5 First Aid and Medical Supplies**		
621.	**7.5.1 First Aid Center**		
622.	A decon shower and first aid supplies are located in the Main Access Control area in the lower level of the Plant Administration Building. Immediate and temporary care may be given to a victim in this area.	**Section K.1.e** Guidelines as established in radiation protection procedures will be used to determine action levels for decontamination. Radiation protection procedures have been established for decontamination of emergency workers and equipment. The means for disposal of contaminated waste are also established.	The Standard Plan retains the commitment to perform decontamination of emergency workers without specifying methodology.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
623.	If the injury involves contamination that cannot be removed without causing further injury, steps will be taken to minimize the spread of contamination until medical assistance arrives or until the victim has been transported to the hospital.	**Section K.1.e** Guidelines as established in radiation protection procedures will be used to determine action levels for decontamination. Radiation protection procedures have been established for decontamination of emergency workers and equipment. The means for disposal of contaminated waste are also established.	The Standard Plan retains the commitment to perform decontamination of emergency workers without specifying methodology.
624.	**7.5.2 First Aid Kits**		
625.	First Aid kits are located in the Fire Brigade Room at Main Access Control, Work Execution Center and various other areas on the plant site. Stretchers and shock blankets are located on each level of the Containment Building, Turbine Building and Main Access Control.	No equivalent statement	NUREG-0654, Revision 2, removes functions from the E Plan that are controlled by other site Plans. In this case the Fire Plan directs the activity.
626.	**7.6 Damage Control Equipment and Supplies**		
627.	**7.6.1 Firefighting Equipment**		
628.	A full line of fire fighting equipment and supplies is available for damage control operations. The equipment is stored in the Fire Brigade Room adjacent to the Main Access Control area in addition to various areas within the plant for easy access and quick response to fires.	No equivalent statement	NUREG-0654, Revision 2, removes functions from the E Plan that are controlled by other site Plans. In this case the Fire Plan directs the activity.
629.	**7.6.2 Spill and Leak Control Equipment**		
630.	Spill and leak control equipment includes electric and gas driven pumps, various patching supplies and welding equipment. This equipment is available in the warehouse along with machine shop facilities for response to a wide variety of problems.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan retains the commitment to have the capability to contain the spread of contamination without specifying methodology.
631.	**7.7 Public Alert and Notification System (ANS)**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
632.	Within the Plume Exposure Emergency Planning Zone (EPZ) there exists provisions for alerting and providing notification to the public. The state and local authorities are responsible for activation of this system.	**Monticello Annex, Section E.2** The ANS system consists of a primary and backup activation and monitoring of outdoor warning sirens, primary and backup initiation of the Emergency Alert System (EAS), primary and backup initiation of the Integrated Public Alert and Warning System (IPAWS), and county auto-dial notification systems for special populations.	The Plan aligns wording between the three existing Plans without change in practice or intent.
633.	The ANS system consists of a primary and backup activation and monitoring of outdoor warning sirens, primary and backup initiation of the Emergency Alert System (EAS), primary and backup initiation of the Integrated Public Alert and Warning System (IPAWS), and county auto-dial notification systems for special populations.		
634.	Emergency Planning Visitor Guides are available for distribution in all recreational areas to advise transient populations of the action they should take in the event of an accident at the MNGP. Annual Emergency Planning Guides are distributed to all residential and business addresses within the 10-mile EPZ and contain information for the public to use in the event they hear sirens or EAS Messages over the local radio system.	**Section G.2** Various means are used to share information with the public and the media, such as media briefings in person or by phone, news conferences, social media posts, web posts, blogs, interactive voice response messages, news releases/updates/advisories, etc.	The Plan aligns wording between the three existing Plans without change in practice or intent.
635.	Activation of the ANS begins with a protective action recommendation (PAR) of evacuation or sheltering by the MNGP Emergency Director/Manager.	**Monticello Annex, Section E.2** Activation of the ANS begins with a protective action recommendation (PAR) of evacuation or sheltering by the MNGP Emergency Director/Manager.	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
636.	The Minnesota Division of Homeland Security and Emergency Management (HSEM) is responsible for coordinating the recommendation and making it a decision with appropriate approvals and assigning siren activation times and EAS activation times. The Sherburne and Wright County Sheriff's Offices are responsible for activation of the outdoor warning sirens.	**Monticello Annex, Section E.2** The Minnesota Division of Homeland Security and Emergency Management (HSEM) is responsible for coordinating the recommendation and making it a decision with appropriate approvals and assigning siren activation times and EAS activation times. The Sherburne and Wright County Sheriff's Offices are responsible for activation of the outdoor warning sirens.	The Plan aligns wording between the three existing Plans without change in practice or intent.
637.	The system consists of 106 sirens. The 106 sirens provide 100% coverage of the populated area within the 10-mile EPZ. In the event that a siren is not working, affected areas will still be alerted through the use of IPAWS.	**Monticello Annex, Section E.2** The sirens provide essentially 100% coverage of the populated area within the 10-mile EPZ. In the event that a siren is not working, affected areas will still be alerted through the use of IPAWS.	The Plan aligns wording between the three existing Plans without change in practice or intent.
638.	Additional, detailed information about the ANS system, including system design, siren coverage analysis, testing schedules, and an evaluation of the current system is found in the Alert and Notification System Design Report.	**Monticello Annex, Section E.2** Detailed information on the FEMA approved system used to alert and notify the general public is maintained in the Monticello Nuclear Generating Plant ANS Report (EPLAN-10).	The Plan aligns wording between the three existing Plans without change in practice or intent.
639.	**7.8 Auto Dialing Telephone Systems**		
640.	To further ensure prompt notification, auto-dialing systems are used to notify various commercial, institutional, and education facilities in the 10 mile zone. These locations may harbor large groups of people during all or part of a day. Auto dialing systems will be activated by the local counties.	No equivalent statement	The Plan maintains the commitment to notify OROs in a timely manner in Section E. The auto-dial system is part of the ORO decision making and notification process subsequent to site notifications and no longer part of the NUREG-0654, Revision 2, format for licensee responsibilities.
641.	**7.9 Mapping**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
642.	10 mile EPZ maps are periodically updated to reflect population and geo-physical changes.	**Section P.4** The SEP and associated documents as identified herein, are reviewed on an annual basis and updated if necessary. Changes due to regulatory revisions, issues identified by drills and exercises, or other updates will be incorporated. **Monticello Annex, Figure 1**	The Plan provides for annual review and updating of all plan components.
643.	Table 6 MONTICELLO NUCLEAR GENERATING PLANT COMMUNICATIONS MATRIX	**Monticello Annex, Table F.1.b**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.a.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications include Attachment 5 documenting specifically the Communication Methods and Interfaces.
644.	Table 7 COMMUNICATIONS CONTACTS	No equivalent statement	The Plan maintains the commitment to perform the function in the respective sections without use of a stand-alone table. Figures/tables are contained in section H where needed.
645.	Table 8 SEISMIC MONITORING INSTRUMENTATION	No equivalent statement	The Plan maintains the commitment to perform the function in the respective sections without use of a stand-alone table. Figures/tables are contained in section H where needed.
646.	Table 9 ON-SITE METEOROLOGICAL MONITORING INSTRUMENTATION	No equivalent statement	The Plan maintains the commitment to perform the function in the respective sections without use of a stand-alone table. Figures/tables are contained in section H where needed.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
647.	Table 10 PROCESS RADIATION MONITORS	No equivalent statement	The Plan maintains the commitment to perform the function in the respective sections without use of a stand-alone table. Figures/tables are contained in section H where needed.
648.	Table 11 AREA RADIATION MONITORS	No equivalent statement	The Plan maintains the commitment to perform the function in the respective sections without use of a stand-alone table. Figures/tables are contained in section H where needed.
649.	Table 12 INSTRUMENTS AVAILABLE FOR MONITORING MAJOR SYSTEMS	No equivalent statement	The Plan maintains the commitment to perform the function in the respective sections without use of a stand-alone table. Figures/tables are contained in section H where needed.
650.	Table 13 EMERGENCY KITS	No equivalent statement	The Plan maintains the commitment to perform the function in the respective sections without use of a stand-alone table. Figures/tables are contained in section H where needed.
651.	**SECTION 8.0 MAINTAINING EMERGENCY PREPAREDNESS**		
652.	**8.1 Organizational Preparedness**		
653.	**8.1.1 Emergency Response Organization Training**		
654.	Training of ERO personnel is controlled by the EP Training Program Description (TPD). The requirements for training in the TPD are based on a graded approach to the systematic approach to training.	**Section O.1** Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency. Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
655.	Off-site Emergency Preparedness Coordinators will make provisions for the training of those off-site organizations who may be called upon to provide assistance in the event of an emergency.	**Section O.1.a** Xcel Energy offers emergency response training annually for those offsite organizations that may be called upon to provide onsite assistance in the event of an emergency. They are invited to attend training applicable to the Xcel Energy nuclear site or sites where they could provide assistance. Training of state and county offsite response organizations is described in their respective radiological emergency plans, with support provided by Xcel Energy, if requested.	The Plan aligns wording between the three existing Plans without change in practice or intent.
656.	**8.1.2 Drills, Exercises and Tests**		
657.	The Off-site Nuclear Emergency Plan contains the specific requirements for the conduct of required drills and exercises.	**No equivalent statement** **(See N.4.e)**	Incorporation of the Offsite Nuclear Emergency Plan into the Standard Plan eliminates the need for the reference. Section N in its entirety controls the drill and exercise program.
658.	The conduct of periodic drills and exercises are the responsibility of the Nuclear Emergency Preparedness Group in accordance with the Emergency Preparedness Drill & Exercise Manual, which includes:	No equivalent statement	Incorporation of the Offsite Nuclear Emergency Plan into the Standard Plan eliminates the need for the reference. Section N in its entirety controls the drill and exercise program.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
659.	**8.1.2.1** An exercise which tests the integrated capability and basic elements of the Emergency Plan SHALL be conducted every 2 years. This exercise may be included in the full participation biennial exercise which tests the off–site state and local emergency plans.	**Section N.2.a** Each Xcel Energy nuclear site will conduct a Plume Exposure Pathway (PEP) Exercise biennially. This exercise includes mobilization of licensee state, local, and tribal government personnel, as applicable, and resources and implementation of emergency plans to demonstrate response capabilities. State, county and tribal authorities are invited to participate in PEP exercises. If a state, county or tribal organization chooses not to participate it will be documented that they were given the opportunity to participate. Exercise scenarios are submitted in accordance with 10 CFR 50, Appendix E, IV.F(2)b.	The Plan aligns wording between the three existing Plans without change in practice or intent.
660.	**8.1.2.2** In order to ensure that adequate emergency response capabilities are maintained during the interval between biennial exercises, drills SHALL be conducted including at least one drill involving a combination of some of the principal functional areas of the on-site emergency response capabilities.	No equivalent statement	Drill and Exercise Language in Section N were aligned to the format of NUREG-0654, Revision 2.
661.	The principal functional areas of emergency response include activities such as management and coordination of emergency response, accident assessment, protective action decision making, and plant system repair and corrective actions.	No equivalent statement	Drill and Exercise Language in Section N were aligned to the format of NUREG-0654, Revision 2.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
662.	During these drills, activation of all of the Emergency Plan's response facilities (TSC, OSC, and EOF) is not necessary, opportunities to consider accident management strategies may be provided, supervised instruction is permitted, operating staff may have the opportunity to resolve problems (success paths) rather than have controllers intervene, and the drills may focus on on-site training objectives.	No equivalent statement	Drill and Exercise Language in Section N were aligned to the format of NUREG-0654, Revision 2.
663.	**8.1.2.3** A medical emergency drill, involving response to and transport of a simulated contaminated, injured individual, which provides for off-site support agency participation, SHALL be conducted annually.	**Section N.4.a** Each Xcel Energy nuclear site will conduct an emergency medical drill once per calendar year. The scope of the emergency medical drill will include a simulated contaminated individual and invitation for participation by support services agencies.	The Plan aligns wording between the three existing Plans without change in practice or intent.
664.	**8.1.2.4** Health Physics Drills which involve response to and analysis of simulated elevated airborne or liquid samples and direct radiation measurements in the environment SHALL be conducted semi-annually. These drills may be performed as stand alone Health Physics Drills or included as part of other drills or exercises.	No equivalent statement	Drill and Exercise Language in Section N were aligned to the format of NUREG-0654, Revision 2.
665.	**8.1.2.4.1** The analysis of in-plant liquid samples (with actual elevated radiation levels) including the use of the Post Accident Sampling System (PASS) will be included in biennial chemistry training/walkthroughs and may be performed in conjunction with full scale exercises/drills or Health Physics drills.	**Section N.4.g** Testing of Post-accident sampling systems are completed as a function of site technical specifications.	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
666.	**8.1.2.4.2** Radiological monitoring drills which include the collection and analysis of environmental samples for the purpose of ground deposition assessment SHALL be conducted annually and may be performed as stand alone Health Physics Drills or included as part of other drills or exercises.	**Section N.4.d** Each Xcel Energy nuclear site will conduct an environmental monitoring drill once per calendar year. The scope of the environmental monitoring drill will include performance objectives for direct radiation measurements in the environment, collection and analysis of sample media including water, vegetation, soil, and air, provisions for communications and record keeping.	The Plan aligns wording between the three existing Plans without change in practice or intent.
667.	**8.1.2.5** Fire Drills SHALL be conducted in accordance with applicable Plant Administrative Control Directives.	No equivalent statement	Fire Drills are conducted as part of the Site Fire Plan. In alignment with the NUREG-0654, Revision 2, philosophy no longer addressed in the Emergency Plan.
668.	**8.1.2.6** In addition to drills and exercises, periodic tests are conducted to ensure an adequate state of emergency preparedness is maintained. These tests include:	No equivalent statement	N/A Sentence is a lead in to the actual commitments.
669.	**8.1.2.6.1** Communications tests with State and Local government agencies, local law enforcement, and off-site facilities within the plume EPZ are conducted monthly in accordance with plant Surveillance 1225.	**Section N.4.f** Communications Drills are accomplished during testing described in element F.3.	The Plan aligns wording between the three existing Plans without change in practice or intent.
670.	**8.1.2.6.2** Communications tests with the NRC via the Emergency Notification System (ENS) and Health Physics Network (HPN) are conducted monthly in accordance with Surveillance 1225.	**Section F.3** Communications tests will be conducted and documented on the frequency specified below. The tests include provisions to ensure participants in the test are able to understand the content of the messages in the test. • Systems used to communicate from the MCR, TSC, and EOF to NRC Headquarters and NRC Regional Office Operations Center are tested monthly.	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
671.	**8.1.2.6.3** Emergency Response Organization Augmentation tests are conducted quarterly in accordance with plant Surveillance 1317.	**Section N.1.c** Each Xcel Energy nuclear site will conduct at least one drill or exercise between 6:00 pm and 4:00 am within an eight-year exercise cycle. This requirement may be satisfied by an actual event provided it meets the above criteria and the objectives are evaluated and documented in a critique report for the augmentation of the ERO.	The Plan aligns wording between the three existing Plans without change in practice or intent.
672.	**8.1.2.6.4** The Public Alert Notification System (ANS) is tested weekly in accordance with plant Surveillance Test 1359.	**Monticello Annex, Section F.3** ANS silent testing is completed on a weekly frequency and activation testing is completed on a monthly frequency.	The Plan aligns wording between the three existing Plans without change in practice or intent.
673.	**8.1.2.6.5** The Annual Performance Review for the ANS is conducted in accordance with plant Surveillance 1408.	No equivalent statement	The Statement existed previously to document station support for the Annual Siren Report. This report is covered under the Offsite FEMA approval process and not needed to support site EP functions.
674.	**8.1.2.6.6** The Auto Dialing Telephone Systems are tested by Sherburne County and Wright County staff. Completion of the testing and system maintenance is verified on a semi-annual basis in accordance with plant Surveillance 1410.	**Section F.3** Communications tests will be conducted and documented on the frequency specified below. The tests include provisions to ensure participants in the test are able to understand the content of the messages in the test. • Systems used to communicate with state and county government warning points within the plume exposure pathway EPZ will be tested monthly • Systems used to communicate with state and county government EOCs are tested annually.	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
675.	**8.1.2.6.7** The ERDS communication link is tested on a quarterly basis in accordance with plant Surveillance 1416.	**Section F.3** Communications tests will be conducted and documented on the frequency specified below. The tests include provisions to ensure participants in the test are able to understand the content of the messages in the test. • The ERDS is verified as connected and transmitting data on a quarterly basis.	The Plan aligns wording between the three existing Plans without change in practice or intent.
676.	**8.2 Planning**		
677.	**8.2.1 Responsibility**		
678.	The overall responsibility for radiological emergency response planning rests with NSPM management.	**Section P.2** The Xcel Energy Chief Nuclear Officer has the overall authority and responsibility for Xcel Energy Emergency Plan.	The Plan aligns wording between the three existing Plans without change in practice or intent.
679.	At the site level the Site Vice President, Monticello Site has overall authority and responsibility for the Monticello Emergency Plan and Emergency Plan Implementing Procedures.	No equivalent statement	The incorporation of the Plan into an integrated Plan focuses the responsibility for the Plan on the Chief Nuclear Officer.
680.	The Site Emergency Planners are responsible for the development and updating of the Emergency Plan and coordination of the plan with off-site emergency response plans.	**Section P.3** The Xcel Energy EP Staff is responsible for the development, maintenance, review, and updating of the emergency plan and site-specific annexes, as well as the coordination of the plan with other response organizations as shown in Figure P.1	The Plan aligns wording between the three existing Plans without change in practice or intent.
681.	**8.2.2 Review and Updating of the Emergency Plan**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
682.	The Monticello Emergency Plan SHALL be reviewed and certified to be current on an annual basis in accordance with the Off-site Nuclear Emergency Plan. Other reviews of the Emergency Plan and Implementing Procedures will be performed as required by Technical Specifications. Annual revisions to the Emergency Plan are conducted in accordance with Surveillance Procedure 1406 and may be based on the following:	**Section P.9** An independent review will be conducted in accordance with the requirements of 10 CFR 50.54(t)(2). The review findings will be submitted to the appropriate corporate and site management. The part of the review involving the evaluation of the adequacy of interface with state and county governments will be reported to the appropriate state and county governments. Corporate or site management, as appropriate, will evaluate the findings affecting their area of responsibility and ensure effective corrective actions are taken. The results of the review, along with recommendations for improvements, will be documented, and retained.	The Plan aligns wording between the three existing Plans without change in practice or intent.
683.	**8.2.2.1** Lessons learned during drills and exercises and industry lessons learned.	See Column 2 Line 682	The Plan aligns wording between the three existing Plans without change in practice or intent.
684.	**8.2.2.2** Changes in the normal plant or Emergency Response Organization structures.	See Column 2 Line 682	The Plan aligns wording between the three existing Plans without change in practice or intent.
685.	**8.2.2.3** Modifications to plant systems, components or instrumentation.	See Column 2 Line 682	The Plan aligns wording between the three existing Plans without change in practice or intent.
686.	**8.2.2.4** Changes in the functions or responsibilities of supporting agencies and organizations.	See Column 2 Line 682	The Plan aligns wording between the three existing Plans without change in practice or intent.
687.	**8.2.2.5** Lessons learned from real emergency plan activations.	See Column 2 Line 682	The Plan aligns wording between the three existing Plans without change in practice or intent.
688.	**8.2.2.6** Changes in State or Federal regulations.	See Column 2 Line 682	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
689.	Changes to the Emergency Plan SHALL be reviewed and approved in accordance with plant Technical Specifications and applicable Administrative Control Directives. Distribution of controlled copies of the Emergency Plan SHALL be performed in accordance with applicable MNGP document control procedures.	**Section P.3** The Xcel Energy EP Staff is responsible for the development, maintenance, review, and updating of the emergency plan and site-specific annexes, as well as the coordination of the plan with other response organizations as shown in Figure P.1	The Plan aligns wording between the three existing Plans without change in practice or intent.
690.	In addition to the annual review, all Emergency Plan Implementing Procedures containing telephone numbers are reviewed at least quarterly to verify the correct numbers in accordance with Surveillance Procedure 1240.	**Section P.10** The Emergency Preparedness Emergency Telephone Directory contains contact numbers for ORO, ERF, and support organizations identified in the emergency plan and implementing procedures. The directory is reviewed quarterly and updated as needed. EP staff update call out information in the ERO Notification System quarterly.	The Plan aligns wording between the three existing Plans without change in practice or intent.
691.	**8.3 Maintenance and Inventory of Emergency Equipment and Supplies**		
692.	**8.3.1 Equipment and Supplies Inventory**		
693.	Emergency Equipment and supplies SHALL be inventoried at least quarterly in accordance with plant Surveillance Procedure 1102-01 and 1102-02.	**Section H.11** In addition to supplies of normal use equipment and instruments, emergency kits are maintained at Xcel Energy nuclear sites. Routine quarterly inventories are performed to verify contents and operationally check equipment/instruments in accordance with site procedures.	The Plan aligns wording between the three existing Plans without change in practice or intent
694.	**8.3.2 Instrument and Facilities Functional Check**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
695.	Key emergency response equipment and instrumentation located in the Technical Support Center and Emergency Operation Facility is tested monthly in accordance with plant Surveillance Test 1230.	**Section H.11** In addition to supplies of normal use equipment and instruments, emergency kits are maintained at Xcel Energy nuclear sites. Routine quarterly inventories are performed to verify contents and operationally check equipment/instruments in accordance with site procedures.	The Plan aligns wording between the three existing Plans without change in practice or intent.
696.	**SECTION 9.0 RECOVERY**		
697.	**9.1 General Approach**		
698.	In general, the site organization will be responsible for the short term recovery, that is recovery from an emergency condition in which no core damage or serious release of radioactivity to the environment has occurred.	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization.	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area.
699.	If it is clear that a high potential exists for core damage or a serious release of radioactivity to the environment has occurred, a Recovery Phase will be activated to provide for the long-term recovery actions and for establishing support arrangements.	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization.	The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
700.	Before reoccupying buildings after an emergency, certain recovery criteria must be satisfied:	**Section M.1.a** Site reentry criteria and actions are established by recovery procedures.	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
701.	•There must be assurance that the problem encountered is solved and that the same incident cannot immediately recur; • The normally occupied areas must be free of significant contamination; • Radiation areas and High Radiation areas must be properly defined; • Airborne radioactivity must be eliminated or controlled.	**Section M.3** The Emergency Director in consultation with the Emergency Manager, determines when conditions warranting an emergency declaration have passed and steps will be taken to terminate directly from the event or transition to a recovery organization. Recovery from an emergency situation is guided by the following principles: • The protection of the public health and safety is the foremost consideration in formulating recovery plans. • Public officials would be kept informed of recovery plans so that they can properly carry out their responsibilities to the public, • Periodic information would be provided to the news media so that they can provide information to the public regarding recovery plans and progress made.	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
702.	**9.2 Investigation of Incidents**		
703.	All incidents SHALL be investigated by qualified plant staff personnel and reported to the Plant Operations Review Committee, Management and Safety Review Committee (MSRC) and the NRC in accordance with guidelines for reportable events which are set forth in the Administrative Control Directives and the Technical Specifications.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
704.	**9.3 Recovery Procedures**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
705.	All recovery operations SHALL be performed in accordance with written procedures. These procedures SHALL include the following activities:	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
706.	•Investigation of the course of the incident. • Investigation of plant conditions following an accident. • Repair and restoration of facilities. • Testing and startup of restored facilities.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
707.	Methods for determining the extent of radioactive contamination and general protective measures to be taken for personnel performing recovery operations are established in site Radiation Protection Procedures.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
708.	Written procedures for recovery of the facility from the specific post accident conditions will be prepared by qualified plant staff members and submitted to the Plant Operations Review Committee. The Plant Operations Review Committee approval of all such procedures is required prior to their initiation.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
709.	**9.4 Criteria for Resumption of Operation**		

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
710.	If the plant is shutdown as the result of an emergency, it will be restarted only when: • The conditions which caused the emergency are corrected. • The cause of the emergency is understood. • Restoration, repair and testing is completed as required. • No unreviewed safety questions exist. • All conditions of the license and technical specifications are satisfied.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
711.	**9.5 Long Term Recovery**		
712.	If extensive plant damage exists and contamination of plant or site environs has occurred, then a Recovery Phase will be required.	**Section M.3** Implementing procedures provide guidance to directly terminate from an Unusual Event, Alert or Site Area Emergency with no long-term plant damage classifications when a normal outage organization is able to address any plant issues, or to transition to a recovery organization.	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
713.	Entry into the Recovery Phase will take place in an incremental manner as the functions change from operational to engineering/construction. The decision to enter the Recovery Phase will be made by Site Management. The Recovery Manager will be selected from several qualified designees who are members of the site organization. The Emergency Manager and the Emergency Director will share responsibility at least during the early part of the Recovery Phase.	**Section M.3** Recovery from an emergency situation is guided by the following principles: • The protection of the public health and safety is the foremost consideration in formulating recovery plans. • Public officials would be kept informed of recovery plans so that they can properly carry out their responsibilities to the public, • Periodic information would be provided to the news media so that they can provide information to the public regarding recovery plans and progress made. • Periodic status reports would be given to company employees at other locations and to government and industry representatives	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
714.	If a transition to the Recovery Phase becomes necessary, the site engineering/construction oriented staff would provide the nucleus of the organization responsible to carry out the Recovery Phase.	**Section M.3** Implementing procedures provide guidance to directly terminate from an Unusual Event, Alert or Site Area Emergency with no long-term damage classifications when a normal outage organization is able to address any plant issues, or to transition to a recovery organization. The Emergency Director in consultation with the Emergency Manager, determines when conditions warranting an emergency declaration have passed and steps will be taken to terminate directly from the event or transition to a recovery organization.	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
715.	The plant staff would be augmented as required by specialists from the site organization and the NSPM/Xcel Energy corporate office. These specialty areas include Engineering Services, Licensing Administration, Maintenance, Quality Assurance, Communications and Security personnel. In addition, appropriate assistance would be secured from the Architect-Engineer and the Technical Support Services vendor organizations. This support could be broadened as required by consultant help from the several organizations familiar with the MNGP and organization. The overall organizations envisioned for a substantial Recovery Phase would be a blend of site staff and appropriate vendor and consultant personnel	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization. **Figure M.2-1**	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
716.	On a prior basis it is counter productive to define in detail the extensive organization that might be involved in a sizable Recovery Phase because of the unlimited variation of conditions that could result from plant emergencies.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
717.	However, the nucleus organization has been identified together with guidelines on how the organization might be expanded to meet the requirements demanded at the time.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
718.	When the Emergency Manager and Emergency Director agree that the emergency condition has been terminated, a complete transfer of the responsibilities for off-site support may be made to the Recovery Organization. The EOF will then become the Recovery Center and will function as Command Center for the Recovery Organization activation and implementation in accordance with applicable Emergency Plan Implementing Procedures.	**Section M.3** The Emergency Director in consultation with the Emergency Manager, determines when conditions warranting an emergency declaration have passed and steps will be taken to terminate directly from the event or transition to a recovery organization.	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
719.	**SECTION 10.0 APPENDIX A – Procedure No., Procedure Title, Plan Section Reference Chart**		
720.	**SECTION 11.0 APPENDIX B – NUREG 0654-Section, Emergency Plan Section**		
721.	A - Assignment of Responsibility B - On-Site Emergency Organization C - Emergency Response Support and Resources D - Emergency Classification System E - Emergency Classification System F - Emergency Communications G - Public Education and Information	No equivalent statement	The Standard Plan has been designed to align with the Sections and elements of NUREG-0654, Revision 2. The need for an Appendix providing a separate cross reference to document is eliminated by the chosen structure of the Plan.
722.	H - Emergency Facilities and Equipment I - Accident Assessment J - Protective Response K - Radiological Exposure Control L - Medical and Public Health Support	No equivalent statement	The Standard Plan has been designed to align with the Sections and elements of NUREG-0654, Revision 2. The need for an Appendix providing a separate cross reference to document is eliminated by the chosen structure of the Plan.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
723.	M - Recovery and Re-entry Planning and Post Accident Operations N - Exercises and Drills O - Radiological Emergency Response Training P - Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans	No equivalent statement	The Standard Plan has been designed to align with the Sections and elements of NUREG-0654, Revision 2. The need for an Appendix providing a separate cross reference to document is eliminated by the chosen structure of the Plan.
724.	**SECTION 12.0 ANNEX A MNGP EMERGENCY ACTION LEVELS AND APPLICABLE DEFINITIONS**		
725.	Emergency Action Levels		
726.	The site specific Emergency Action Levels are contained in 5790-101-02 (MONTICELLO NUCLEAR GENERATING PLANT EMERGENCY ACTION LEVEL MATRIX), Revision 14. These EALs are based on NEI 99-01, Revision 6.	**Monticello Nuclear Generating Plant Emergency Action Levels, (EPLAN-04)**	The Plan aligns wording between the three existing Plans without change in practice or intent.
727.	Emergency Plan Implementing Procedure A.2-101 (CLASSIFICATION OF EMERGENCIES) requires use of 5790-101-02.	**Monticello Nuclear Generating Plant Emergency Action Levels, (EPLAN-04)**	The Plan aligns wording between the three existing Plans without change in practice or intent.
728.	**12.0 FIGURE Annex A-1** Monticello Nuclear Generating Plant Emergency Action Level Matrix **Left half of Page 1** of 5790-101-02, Revision 14.	**Monticello Nuclear Generating Plant Emergency Action Levels, (EPLAN-04)**	The Plan aligns wording between the three existing Plans without change in practice or intent.
729.	**12.0 FIGURE Annex A-1** Monticello Nuclear Generating Plant Emergency Action Level Matrix (Cont'd) **Right half of Page 1** of 5790-101-02, Revision 14.	**Monticello Nuclear Generating Plant Emergency Action Levels, (EPLAN-04)**	The Plan aligns wording between the three existing Plans without change in practice or intent.
730.	**12.0 FIGURE Annex A-1** Monticello Nuclear Generating Plant Emergency Action Level Matrix (Cont'd) **Left half of Page 2** of 5790-101-02, Revision 14.	**Monticello Nuclear Generating Plant Emergency Action Levels, (EPLAN-04)**	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
731.	**12.0 FIGURE Annex A-1** Monticello Nuclear Generating Plant Emergency Action Level Matrix (Cont'd) **Right half of Page 2** of 5790-101-02, Revision 14.	**Monticello Nuclear Generating Plant Emergency Action Levels, (EPLAN-04)**	The Plan aligns wording between the three existing Plans without change in practice or intent.
732.	**SECTION 13.0 FIGURES**		
733.	**Figure 13.1 MONTICELLO PLANT EMERGENCY ORGANIZATION Technical Support Center Positions Report Within 60 Minutes**	**Section B, Figure B-1, TSC Organization**	The Plan aligns wording between the three existing Plans without change in practice or intent. See Enclosure 1 Section B of this submittal for the detailed staffing justification.
734.	**Figure 13.1 MONTICELLO PLANT EMERGENCY ORGANIZATION (CONT'D) Operational Support Center Positions Report Within 60 Minutes Unless Otherwise Indicated on Table 1**	**Section B, Figure B-2, OSC Organization**	The Plan aligns wording between the three existing Plans without change in practice or intent. See Enclosure 1 Section B of this submittal for the detailed staffing justification.
735.	**Figure 13.1 MONTICELLO PLANT EMERGENCY ORGANIZATION (CONT'D) Emergency Operations Facility Positions Report Within 90 Minutes**	**Section B, Figure B-3, EOF Organization**	The Plan aligns wording between the three existing Plans without change in practice or intent. See Enclosure 1 Section B of this submittal for the detailed staffing justification.
736.	**Figure 13.2 INTERFACE BETWEEN FUNCTIONAL AREAS OF EMERGENCY ACTIVITY**	**Section B, Figure B.4-1, Block Diagram**	The Plan aligns wording between the three existing Plans without change in practice or intent.
737.	**Figure 13.3 INTERFACE BETWEEN FUNCTIONAL AREAS OF EMERGENCY ACTIVITY DURING HOSTILE ACTION BASED EVENTS**	No equivalent statement	ORO and Site interfaces during a Hostile Action Event are addressed within the contents of the Letters of Agreement cited in the Monticello Annex

	Current MNGP Emergency Plan Revision 55	Standard Emergency Plan or MNGP Annex Description	Justification
738.	**Figure 13.4 PLAN VIEW OF TECHNICAL SUPPORT CENTER, BACK-UP OPERATIONAL SUPPORT CENTER**	No equivalent statement	The Plan commits to the personnel structure of the facility and the personnel makeup. A floor diagram of the facility is not needed to support Plan implementation.
739.	**Figure 13.5 PLAN VIEW OF THE EMERGENCY OPERATIONS FACILITY**	No equivalent statement	The Plan commits to the personnel structure of the facility and the personnel makeup. A floor diagram of the facility is not needed to support Plan implementation.
740.	**Figure 13.6 DIRECT DEDICATED TELEPHONES (HOT LINES) MONTICELLO TELEPHONE NETWORK (Primary Communications Link)**	**Section B, Figure B.4-1, Block Diagram** **Section F, Emergency Communications**	The Plan provides a block diagram for the interface between the site facilities and OROs. Section F in its entirety provides a description of the communications links available/maintained. A separate table for phone lines potentially limits flexibility to use the most effective link. Communication Methods and Interfaces are provided in Enclosures 2 and 3 of this submittal (Site Specific Analyses).
741.	**Figure 13.7 PLAN VIEW OF OPERATIONAL SUPPORT CENTER PAB 1st Floor OSC Assembly Areas**	No equivalent statement	The Plan commits to the personnel structure of the facility and the personnel makeup. A floor diagram of the facility is not needed to support Plan implementation.
742.	**Figure 13.7 PLAN VIEW OF OPERATIONAL SUPPORT CENTER (CONT'D) PAB 2nd Floor OSC Command Center**	No equivalent statement	The Plan commits to the personnel structure of the facility and the personnel makeup. A floor diagram of the facility is not needed to support Plan implementation.
743.	**Figure 13.8 SUMMARY OF SIGNIFICANT CHANGES**	**Appendix D – Changes from Previous Revision**	No change

Enclosure 2, Attachment 4

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

Monticello Nuclear Generating Plant
ERO Change Summary

Technical Support Center (TSC) Position Changes		
Current Position	**Proposed Position**	**Change**
Engineering Group Leader	Engineering Coordinator	Title change only
Operations Group Leader	Operations Coordinator	Title change only
Emergency Response Facility (ERF) Communicator	TSC Emergency Response Facility (ERF) Communicator	Title change only
Security Group Leader	Security Coordinator	Title change only
Maintenance Group Leader	Maintenance Coordinator	Title change only
Radiological Emergency Coordinator	Radiological Assessment Coordinator	Title change only
Field Team (F/T) Communicator	Field Monitoring Team (FMT) Monitor	Title change only
RP Support	Field Monitoring Team (FMT) 1	Title change only
RP Support	Field Monitoring Team (FMT) 2	Title change only
Nuclear Engineer	Core Thermal Engineer	Title change only
None	TSC Manager	New position discussed below
Chemistry Section Leader	None	Position removal discussed below
Monitoring Section Leader	None	Position removal discussed below
Assistant Operations Group Leader (Coordinator)	None	Position removal discussed below
SPDS Operator	None	Position removal discussed below
Trending	None	Position removal discussed below
Support Group Leader (TSC)	None	Position removal discussed below
Support Group (TSC)	None	Position removal discussed below
Operational Support Center (OSC) Position Changes		
Current Position	**Proposed Position**	**Change**
Mechanical Maintenance Coordinator	Mechanical Maintenance (MM) Coordinator	Title change only
Mechanics	Mechanical Personnel	Title change only
Electrical Maintenance Coordinator	Electrical Maintenance (EM) Coordinator	Title change only
Electricians	Electrical Personnel	Title change only
Instrument & Control (I&C) Coordinator	Instrument &Control (I&C) Coordinator	Title change only
Instrument &Control (I&C) Technicians	Instrument &Control (I&C) Personnel	Title change only
Radiation Protection (RP) Coordinator	Radiation Protection (RP) Coordinator	Title change only
Chemistry Coordinator	None	Position removal discussed below
Chemistry Technicians	None	Position removal discussed below

EOF Position Changes		
Current Position	**Proposed Position**	**Change**
EOF Coordinator	EOF Manager	Title change only
Radiation Protection Support Supervisor (RPSS)	Radiological Assessment Coordinator (RAC)	Title change only
Field Team Communicator	Field Monitoring Team (FMT) Communicator	Title change only
Assistant EOF Coordinator / Agency Liaison	Offsite Agency Liaison	Position change(s) discussed below
Assistant Radiation Protection SS	None	Position removal discussed below
Field Team Coordinator	None	Position removal discussed below
Radiation Protection (RP) Status Board	None	Position removal discussed below
EOF Radiation Protection Technician (RPT)	None	Position removal discussed below
Sample Courier	None	Position removal discussed below
Count Room Chemistry Technician	None	Position removal discussed below
Technical Support Supervisor	None	Position removal discussed below
Technical Support Staff	None	Position removal discussed below
ENS Communicator	None	Position removal discussed below
SPDS Operator	None	Position removal discussed below
Trending	None	Position removal discussed below
Support Group	None	Position removal discussed below
Joint Information Center (JIC) Position Changes		
Current Position	**Proposed Position**	**Change**
Security Advisor at the State Emergency Operations Center	Security Advisor	Title change only
Emergency Planning County Liaisons	County Liaison(s)	Title change only
Technical Resource Staff	Technical Advisor	Title change only

TSC ERO Position Change Summary	
Current Performer / Functions	**Proposed Performer / Functions**
None	**TSC Manager** - Supervise TSC staffing and activities - Assist the Emergency Director as needed
Change: Addition of the TSC Manager position as an Emergency Response Organization (ERO) position in the TSC **Justification:** The proposed change adds a new position, TSC Manager with the responsibility of supervising TSC staffing and activities and assisting the TSC Emergency Director as needed. Addition of this position enhances emergency response actions by enabling the TSC Emergency Director to focus on command and control duties without being distracted by managing the TSC. There is no loss of capability associated with this function as a result of the proposed change.	

Current Performer / Functions	Proposed Performer / Functions
Chemistry Section Leader - Supervise Chemistry activities	**None**
Change: Removal of the Chemistry Section Leader position as an ERO position in the TSC **Justification:** This position is being removed from the ERO as it does not perform any Emergency Preparedness (EP) functions. Chemistry functions are managed by department procedures as required by Technical Specifications. This change is aligned with NUREG-0654, Revision 2, Table B-1 guidance. There is no loss of capability as a result of the proposed change.	

Current Performer / Functions	Proposed Performer / Functions
Monitoring Section Leader - Supervise on-site radiological surveys, in-plant surveys, access control and initial off-site radiological monitoring - Provide recommendations related to personnel exposure control	**Radiological Assessment Coordinator (TSC)** - Develop Protective Action Recommendations (PARs) - Communicate changes to plant radiological conditions - Provide oversight for facility habitability surveys **RP Coordinator (OSC)** - Provide oversite for OSC activities related to radiological surveys and monitoring for radiological conditions in the plant **Field Team (FMT) Monitor** - Direct field monitoring teams for collection of dose rates and contamination levels

Change: **Removal of the Monitoring Section Leader position as an ERO position in the TSC**

Justification:
The proposed change removes the Monitoring Section Leader position since the support provided by this position is performed by other ERO positions. In the proposed plan change, the Radiological Assessment Coordinator, in the TSC, and RP Coordinator, in the OSC, assume the functions performed by the Monitoring Section Leader. The Field Monitoring Team (FMT) Monitor in the TSC continues to maintain direction and control of the FMTs. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Assistant Operations Group Leader (Coordinator) - Provide support to the Accident Management Team (AMT) - Recommend actions to the Operations Coordinator based on SAMG actions	**None**

Change: **Removal of the Assistant Operations Group Leader (Coordinator) position as an ERO position in the TSC**

Justification:
The Assistant Operations Group Leader serves a Severe Accident Management Guideline (SAMG) function in the TSC and does not perform emergency preparedness functions. The proposed change removes this position from the Emergency Plan and maintains the position in accordance with SAMG procedures/guidelines. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
SPDS Operator - Monitor and project SPDS parameters as identified by TSC personnel - Provide SAMG support as needed	**None**

Change: **Removal of the SPDS Operator position as an ERO position in the TSC**

Justification:
The SPDS Operator provides a support function in the TSC and does not perform emergency preparedness functions. SPDS is an integrated function of the Plant Process Computer System (PPCS) with access available in the TSC through dedicated terminals as well as numerous computers located in the TSC. Support for monitoring and projecting SPDS displays in the facility is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Trending - Trend plant parameters as identified by TSC personnel - Provide SAMG support as needed	**None**

Change: **Removal of the Trending position as an ERO position in the TSC**

Justification:
The Trending position provides a support function in the TSC and does not perform emergency preparedness functions. Trending of plant data is available through SPDS and the data acquisition system available on computers located in the TSC. Trending support for the facility is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Support Group Leader (TSC) - Supervise on-site logistics support including emergency document control, print and drawing retrieval, administrative services, emergency procurement, and warehouse support - Coordinate the establishment of 24-hour ERO shift schedules as requested by the Emergency Director	**None**

Change: **Removal of the Support Group Leader (TSC) position as an ERO position in the TSC**

Justification:
The Support Group Leader serves a support function in the TSC and does not perform emergency preparedness functions. The actions for providing logistics support are directed in accordance with implementing procedures. This support is administrative in nature and will be provided as needed in accordance with implementing procedures. There is no corresponding TSC position identified in Table B-1 of NUREG-0654, Revision 2.

There is no loss of capability as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Support Group (TSC) - Provide on-site logistics support including emergency document control, print and drawing retrieval, administrative services, emergency procurement, and warehouse support	**None**

Change: **Removal of the Support Group (TSC) position as an ERO position in the TSC**

Justification:
The Support Group serves an administrative/support function in the TSC and does not perform emergency preparedness functions. The actions for providing logistics support are directed in accordance with implementing procedures. This support is administrative in nature and will be provided as needed in accordance with implementing procedures. There is no corresponding TSC position identified in Table B-1 of NUREG-0654, Revision 2.

There is no loss of capability associated with this function as a result of the proposed change.

OSC ERO Position Change Summary	
Current Performer / Functions	**Proposed Performer / Functions**
Chemistry Coordinator - Coordinate/supervise Chemistry Section activities	**None**

Change: **Removal of the Chemistry Coordinator position as an ERO position in the OSC**

Justification:
This position is being removed from the ERO as it does not perform any EP functions. Chemistry functions are managed by department procedures as required by Technical Specifications. This change is aligned with NUREG-0654, Revision 2, Table B-1 guidance.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Chemistry Technicians - Chemistry sampling and analysis - Plant and MNGP Alternative Facility Count Room Operation - Core damage assessment support	**None**

Change: **Removal of Chemistry Technician(s) position as an ERO position in the OSC**

Justification:
This position is being removed from the ERO as it does not perform any EP functions. Chemistry functions are managed by department procedures as required by Technical Specifications. This change is aligned with NUREG-0654, Revision 2, Table B-1 guidance.

There is no loss of capability associated with this function as a result of the proposed change.

EOF ERO Position Change Summary	
Current Performer / Functions	**Proposed Performer / Functions**
Asst EOF Coordinator / Agency Liaison - Coordinate operation of the EOF - Assist the Emergency Manager with administrative duties	**Offsite Agency Liaison** - Coordinate ERO and ORO activities **EOF Manager** - Supervise EOF staffing and activities
Change: Removal of Asst EOF Coordinator/Agency Liaison position as an ERO position in the EOF and addition of the Offsite Agency Liaison as an ERO position in the EOF **Justification:** The proposed change removes the position of Assistant EOF Coordinator/Agency Liaison position and assigns the identified functions to the Offsite Agency Liaison and the EOF Manager positions. Coordination of EOF operations is assumed by the EOF Manager which is one of the functions performed by the Assistant EOF Coordinator/Agency Liaison. The proposed new position of Offsite Agency Liaison assumes the Agency Liaison function performed by the Assistant EOF Coordinator/ Agency Liaison. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1. Since the functions of the Assistant EOF Coordinator/Agency Liaison are being performed by other ERO personnel, there is no loss in capability with performance of this function as a result of the proposed change.	

Current Performer / Functions	Proposed Performer / Functions
Assistant RPSS - Assist the Radiation Protection Support Supervisor (RPSS) with coordination of Radiation Protection Support Group activities including of-site dose projections, dose assessment, EOF habitability and direction of Off-site Monitoring teams - General support of the EOF Radiation Protection group including manning communications links (e.g., HPN) and maintaining Radiological Status board(s)	**Radiological Assessment Coordinator** - Assess and communicate offsite radiological conditions - Provide oversite for dose assessments and projections - Recommend PARs to the Emergency Manager
Change: Removal of the Assistant RPSS position as an ERO position in the EOF **Justification:** The proposed change removes this position in the EOF. This position is identified in Figure 13.1 of the current Emergency Plan; however, the functions are identified in an Emergency Plan Implementing Procedure (EPIP). The proposed Radiological Assessment Coordinator position, formerly the Radiation Protection Support Supervisor (RPSS), performs the required functions identified for this position. With the proposed change, FMT activities are controlled from the TSC, therefore additional support in the EOF for this activity is not required. In addition, the dedicated HPN Communicator position in the EOF is not affected by the proposed organization change. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1. Since the EPIP function of this position is being performed by other ERO personnel, there is no loss in capability with performance of this function as a result of the proposed change.	

Current Performer / Functions	Proposed Performer / Functions

Current Performer / Functions	Proposed Performer / Functions
Field Team Coordinator - Direct field monitoring teams for collection of dose rates and contamination levels	**None**

Change: **Removal of the Field Team Coordinator position as an ERO position in the EOF**

Justification:
The proposed change removes this position in the EOF with the function being assumed by the Field Team Monitor in the TSC. The proposed organizational change for the EOF supports the primary EOF function of offsite agency coordination of emergency response actions enabling the EOF to focus on off-site notifications, dose assessment and PAR development. Implementation of a common Xcel Energy EOF, staffed by corporate resources, also minimizes the impact to site resources. FMT coordination is performed in the TSC, thereby not requiring site resources to travel to the common Xcel Energy EOF facilitating the efficient use of MNGP resources to support site response actions. FMT information will be provided as needed by the existing FMT Communicator in the EOF. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Radiation Protection (RP) Status Board - Maintain status board of RP/Dose Assessment activities in the EOF	**None**

Change: **Removal of the RP Status Board position as an ERO position in the EOF**

Justification:
The RP Status Board position serves a support function in the EOF and does not perform emergency preparedness functions. Maintenance of status boards is directed in accordance with implementing procedures. Support for maintaining status boards is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
EOF Radiation Protection Technician (RPT) - Perform EOF habitability surveys - Perform personnel monitoring and decontamination (as necessary)	**None**

Change: **Removal of the EOF RPT position as an ERO position in the EOF**

Justification:
The proposed plan removes the EOF RPT position in the EOF. Implementation of the plan change includes implementation of a common Xcel Energy EOF at the corporate headquarters. Since this facility is

Current Performer / Functions	Proposed Performer / Functions
greater than 25 miles from MNGP, the need to perform this function is no longer required. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1. There is no loss of capability associated with this function as a result of the proposed change.	

Current Performer / Functions	Proposed Performer / Functions
Sample Courier - Transport environmental samples from the FMTs to the EOF count room for analysis	**None**

Change: Removal of the Sample Courier position as an ERO position in the EOF

Justification:
The Sample Courier position is not identified in NUREG-0654, Revision 2, Table B-1. Environmental samples will be collected by the FMTs and transported to the site for analysis as required by implementing procedures. FMTs are equipped to provide in-situ results to support dose projections. Environmental samples are used to determine the consequence of radiological releases and are not required in the immediate response phase of an event. The EOF will no longer contain a count room, therefore this EOF position is no longer required.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Count Room Chemistry Technician - Operate EOF count room equipment	**None**

Change: Removal of the Count Room Chemistry Technician position as an ERO position in the EOF

Justification:
Chemistry functions are managed by department procedure as required by Technical Specifications. This position is being removed from the ERO as it does not perform any EP functions. The proposed Emergency Plan replaces the MNGP EOF with a common Xcel Energy EOF, located at the corporate office. The new EOF is greater than 25 miles from MNGP and will not have a Count Room; therefore, there will be no need for a Count Room Chemistry Technician position in the EOF ERO. Samples will continue to be counted at the Count Room for the respective sites. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Technical Support Supervisor - Direct the activities of the Technical Support Group - Advise the Emergency Manager on technical matters related to the event	**None**

Change: Removal of the Technical Support Supervisor position as an ERO position in the EOF

Justification:
The Technical Support Supervisor serves a support function in the EOF and does not perform emergency preparedness functions. The proposed Emergency Plan replaces the MNGP EOF with a common Xcel Energy EOF. The common EOF functions are focused on coordination of offsite emergency response activities to include State and local notifications, offsite dose projections, Protective Action Recommendations (PARs), and interface with Offsite Response Organizations; therefore, providing Technical and Engineering support from the EOF is no longer required. Implementation of the proposed change identifies Technical and Engineering support as being the responsibility of the TSC. There is no corresponding EOF position in NUREG-0654, Revision 2, Table B-1.

Current Performer / Functions	Proposed Performer / Functions
There is no loss of capability associated with this function as a result of the proposed change.	

Current Performer / Functions	Proposed Performer / Functions
Technical Support Staff - Trend critical parameters - Engineering evaluation in support of the TSC Engineering Group - Technical assessment	**None**

Change: Removal of the Technical Support Staff position(s) as an ERO position(s) in the EOF
Justification:
The Technical Support Staff provide an administrative function in the EOF and do not perform emergency preparedness functions. The proposed Emergency Plan replaces the MNGP EOF with a common Xcel Energy EOF. The common EOF functions are focused on coordination of offsite emergency response activities to include State and local notifications, offsite dose projections, Protective Action Recommendations (PARs), and interface with Offsite Response Organizations; therefore, providing Technical and Engineering support from the EOF is no longer required. Implementation of the proposed change identifies Technical and Engineering support as being the responsibility of the TSC. There is no corresponding EOF position in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
ENS Communicator - Establish and maintain ENS communications with the NRC	**None**

Change: Removal of the ENS Communicator position as an ERO position in the EOF

Justification
The proposed change removes the ENS Communicator position in the EOF. The proposed change maintains ENS communications with the NRC in the TSC, with the position being staffed within 60 minutes of an event requiring activation of the ERO. The proposed Emergency Plan replaces the MNGP EOF with a common Xcel Energy EOF. The common EOF functions are focused on coordination of offsite emergency response activities to include State and local notifications, offsite dose projections, Protective Action Recommendations (PARs), and interface with Offsite Response Organizations; therefore, providing ENS communications from the EOF is no longer required. Maintaining communications from the TSC is appropriate since the facility is on-site and the TSC ENS Communicator has direct access to plant status information which is being provided to the NRC. There is no corresponding EOF position in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
SPDS Operator - Monitor and project SPDS parameters as identified by EOF personnel - Provide SAMG support as needed	**None**

Change: **Removal of the SPDS Operator position as an ERO position in the EOF**

Justification:
The SPDS Operator provides a support function in the EOF and does not perform emergency preparedness functions. SPDS is an integrated function of the Plant Process Computer System (PPCS) with access available in the EOF through numerous computers located in the EOF. Support for monitoring and projecting SPDS displays in the facility is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. The proposed Emergency Plan replaces the MNGP EOF with a common Xcel Energy EOF. The common EOF functions are focused on coordination of offsite emergency response activities to include State and local notifications, offsite dose projections, Protective Action Recommendations (PARs), and interface with Offsite Response Organizations; therefore, providing SAMG and technical support from the EOF is no longer required. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Trending - Trend plant parameters as identified by EOF personnel - Provide SAMG support as needed	**None**

Change: **Removal of the Trending position as an ERO position in the EOF**

Justification:
The Trending position provides a support function in the EOF and does not perform emergency preparedness functions. Trending of plant data is available through SPDS and the data acquisition system available on PCs located in the EOF. Support for trending parameters in the facility is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. The proposed Emergency Plan replaces the MNGP EOF with a common Xcel Energy EOF. The common EOF functions are focused on coordination of offsite emergency response activities to include State and local notifications, offsite dose projections, Protective Action Recommendations (PARs), and interface with Offsite Response Organizations; therefore, providing SAMG and technical support from the EOF is no longer required. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Support Staff - Provide EOF logistics support including emergency document control, print and drawing retrieval, administrative services, emergency procurement, and warehouse support	**None**

Change: **Removal of the Support Staff as an ERO position(s) in the EOF**

Justification:
The Support Staff serves an administrative/support function in the EOF and does not perform emergency preparedness functions. The actions for providing logistics support are directed in accordance with implementing procedures. This support is administrative in nature and will be provided as needed in accordance with implementing procedures. There is no corresponding TSC position identified in Table B-1 of NUREG-0654, Revision 2.

There is no loss of capability associated with this function as a result of the proposed change.

Enclosure 2, Attachment 5

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

Monticello Nuclear Generating Plant
Communications Methods and Interfaces Comparative Table

Communications Methods and Interfaces Comparative Table
Monticello

Communication Methods

Current	Proposed	Basis
Plant Telephone	Plant/Xcel Energy Phones	Consolidated titles for ease of reference
Plant PA	Plant Page System	No change
Cellular Telephone Personal pager	Mobile Devices	Use of generic title for ease of reference.
ERDS	ERDS	No change
Facsimile and/or scan/Email	Facsimile and/or scan/Email	No change
Two-way radio Radio-Telephone link	Xcel Energy Radio Network	Renamed to reflect improvements in Xcel Energy system radio capability.
Dedicated Telephone	Dedicated Telephone	No change
USNRC ENS USNRC/HPN USNRC – FTS Extensions	USNRC Communications	Renamed as a category of available communications for any NRC Systems. Removed reference to FTS to permit flexibility per recent NRC generic communications.
TDS Telecom	Commercial Telephones	Title change
NONE	Satellite phones	Added Satellite Phone reference to Communication Table to better reflect Beyond Design Basis changes as documented in the site 10 CFR 50.54f response.
NONE	ERO Notification System	Added Reference in Communications Table for planned systems.

Communications Methods and Interfaces Comparative Table
Monticello

Facilities/Organizations with Interfacility Communication Responsibilities

Current	Proposed	Basis
Control Room	Control Room	No change
EOF	EOF	No change
TSC	TSC	No change
OSC	OSC	No change
MNGP Security	MNGP Security	No change
Incident Command Post	NONE	Subsumed under Key MNGP Personnel.
MN/HSEM MN Planning and Assessment	MN/HSEM	Relabeled to reflect ORO organization titles.
USNRC HQ	USNRC HQ	No change
USNRC Reg III	USNRC Reg III	No change
USNRC Resident Inspector	USNRC Resident Inspector	No change
Key MNGP Personnel	MNGP Key Personnel	No change
Wright Co. Sheriff	Wright Co. Sherrif	No change
Sherburne Co Sheriff	Sherburne Co Sheriff	No change
DOE/RAP (Chicago)	NONE	DOE Services if required will be requested by ORO.
Civil Defense	NONE	Previous terminology no longer used by OROs
MN State Patrol	MN State Patrol	No change
Monticello City Hall	Monticello City Hall	No change
Monticello Fire/PD	Monticello Police/Fire	No change
Main Access Control	NONE	Managed through Security Plan
Back-Up EOF	NONE	No longer applicable
Xcel Energy System Dispatcher	Xcel Energy System Dispatcher	No change
PINGP	Prairie Island NGP	No change
MNGP Areas	Plant Areas	No change
MNGP-PINGP Monitoring Teams	Field Monitoring Teams	No change
Monticello Hospital	Monticello Hospital	No change
NONE	National Weather Service	Added for completeness and consistency between the sites.
NONE	NRC Near Site Facility	Updated to reflect addition of facility to Standard Plan.
NONE	MNGP Alternative Facility	Updated to reflect addition of facility to Standard Plan.

ENCLOSURE 3

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

LICENSE AMENDMENT REQUEST
XCEL ENERGY STANDARD EMERGENCY PLAN
PRAIRIE ISLAND ANNEX – TECHNICAL ANALYSIS

(18 Pages Follow)

ENCLOSURE 3

NORTHERN STATES POWER COMPANY
PRAIRIE NUCLEAR GENERATING PLANT, UNIT 1 and 2

LICENSE AMENDMENT REQUEST
XCEL ENERGY STANDARD EMERGENCY PLAN
PRAIRIE ISLAND ANNEX – TECHNICAL ANALYSIS

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Attachments

1. Prairie Island Plan Annex
2. Xcel Energy Corporate Emergency Plan Justification Matrix
3. Prairie Island Nuclear Generating Plant Change Justification Matrix
4. Prairie Island Nuclear Generating Plant ERO Change Summary
5. Prairie Island Communications Methods and Interfaces Comparative Table

PRAIRIE ISLAND ANNEX – TECHNICAL ANALYSIS

1.0 SUMMARY

This License Amendment Request (LAR) revises the Prairie Island Nuclear Generating Plant (PINGP) Unit 1 and 2 Emergency Plan which includes the Corporate Offsite Emergency Plan. The proposed revisions include:

- Adoption of a fleet Standard Emergency Plan (SEP) that includes site-specific Annexes. The SEP establishes an updated licensing basis for the Xcel Energy operating plants that complies with current NRC regulations in 10 CFR 50.47, 10 CFR 50 Appendix E, and NRC-generated guidance in NUREG-0654/FEMA-REP-1, Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness, Revision 2.
- Replacing the existing Monticello Nuclear Generating plant (MNGP) and PINGP near-site Emergency Offsite Facilities (EOFs), and their common backup EOF (BUEOF) with a consolidated EOF centrally located in the Xcel Energy headquarters – the detailed description and analysis for this change is contained in Enclosure 4 of this submittal.
- Maintaining the Emergency Notification System (ENS) function in the site Technical Support Centers (TSC) rather than transferring the function to the Emergency Operations Facility (EOF)
- Updates in staffing numbers and duties to conform with NUREG-0654/FEMA-REP-1, Revision 2.
- Re-assignment of on-shift dose assessment from the Chemistry Technician to an RP Technician.

Changes that are common to the MNGP, PINGP, and the Corporate Offsite Emergency Plans are evaluated in Enclosure 1. Changes that are specific to the PINGP Emergency Plan are evaluated below.

The proposed SEP is based on regulatory guidance contained in NUREG-0654 FEMA/REP 1, Revision 2. The format of the proposed SEP is designed to conform with the format outlined in NUREG-0654/FEMA-REP-1 Consequently, regulatory references, emergency planning functions, and functional elements are identified for each section of the proposed SEP. For those functional areas that are addressed in the Site-Specific Annexes, a similar format is used.

2.0 TECHNICAL ANALYSIS

This analysis evaluates the impact to the effectiveness of combining the PINGP Emergency Plan and the Corporate Offsite Emergency Plan into a combined Xcel Energy Emergency Plan with a site-specific Annex for PINGP which addresses site-specific aspects of the emergency plan. The evaluation compares the existing

emergency plan commitments[1] which are based on NUREG-0654/FEMA-REP-1, *Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants*, Revision 1, and subsequent amendments to the Emergency Plan licensing basis, with the commitments in the proposed emergency plan which are based on NUREG-0654/FEMA-REP-1, Revision 2. The evaluation is supported by an attachment that contains a detailed justification matrix for changes to the PINGP and Corporate Offsite Emergency Plans.

A. Assignment of Responsibility

Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the EPZs [Emergency Planning Zones] have been assigned, the emergency responsibilities of the various supporting organization have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

Element Analysis:

A.1 The proposed PINGP Plan Annex states that the county and municipal governments with an operational role within the Prairie Island Nuclear Generating Plant (PINGP) 10-mile EPZ as depicted in Figure 1 of the PINGP Plan Annex are:

- Goodhue County, Minnesota
- Dakota County, Minnesota
- City of Red Wing, Minnesota
- Pierce County, Wisconsin

The county governments having an operational role within the PINGP 50-mile Ingestion Pathway Zone (IPZ) as depicted in Figure 2 of the PINGP Plan Annex are:

Minnesota					**Wisconsin**	
Anoka	Dodge	Olmsted	Steele	Winona	Barron	Pepin
Carver	Goodhue	Ramsey	Wabasha		Buffalo	Pierce
Chisago	Hennepin	Rice	Waseca		Dunn	Polk
Dakota	Le Sueur	Scott	Washington		Eau Claire	St Croix

1. The term ‘commitment’ used throughout this document is not to be construed as a formal NRC commitment as described in NEI 99-04, “*Guidelines for Managing NRC Commitment Changes*.” Rather, “commitment” is used consistent with the NRCs usage of the term in Regulatory Guidance (RG) 1.219, Revision 1, *Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors*.

Tribal Organizations

The Prairie Island Indian Community is located within the PINGP 10-mile EPZ, as depicted in Figure 1, and has an Emergency Operations Plan that includes the description of tribal responsibilities during a nuclear plant declared event.

Commitments in the proposed PINGP Plan Annex related to the identification of Federal, state, local and tribal governments, licensee, and other private sector organization that comprise the overall response for the EPZs do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

A.4 The proposed PINGP Plan Annex states that site specific Letters of Agreement (LOAs) are maintained by PINGP with the following organizations:

- State of Wisconsin
- Goodhue County Emergency Management
- Dakota County Emergency Services
- Pierce County Emergency Management
- City of Redwing
- Prairie Island Indian Community
- Mayo Clinic Health System – Red Wing
- Sacred Heart Hospital
- Westinghouse Electric Company
- Environmental, Inc. Midwest Laboratory
- Canadian Pacific Railway

Commitments in the proposed Xcel Energy PINGP Plan Annex related to the referencing of written agreements with the support organizations having an emergency response role within the EPZs do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

B. Emergency Response Organization (ERO)

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

Functional Analysis:

B.1 The proposed PINGP Plan Annex states that the PINGP on-shift staffing analysis has been developed in accordance with 10 CFR 50 Appendix E.IV.A.9 and NEI 10-05.

The PINGP On-Shift Staffing Analysis Report (EPLAN-09) is maintained in the Document Records Management System.

Commitments in the proposed PINGP Annex related to the specification of how the requirements of 10 CFR 50.47(b)(2) and the applicable sections of Appendix E to 10 CFR Part 50 are met do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

B.2 Note: In the proposed SEP on-shift and augmented staffing is common to MNGP and PINGP. However, because the current staffing is not common to MNGP and PINGP, the detailed description of staffing changes is addressed below and in Attachment 4 of the specific Enclosure for each site.

Plant Operations and Assessment of Operational Aspects

a. NUREG-0654/FEMA REP-01 Revision 1 guidance assumes the on-shift staff will provide the Plant Operations and Assessment of Operational Aspects functions throughout the emergency. The on-shift operations staffing as provided in the SER approved PINGP Emergency Plan, Revision 54 met the operations staffing requirements of 10 CFR 50.54(m)(2)(i) and the PINGP Technical Specifications. The current PINGP Emergency Plan maintains Revision 54 staffing for Operations.

b. NUREG-0654/FEMA REP-01, Revision 2, notes that Table B-1, Emergency Response Organization (ERO) Staffing and Augmentation Plan, lists the EP functions needed to implement the typical emergency plan. Because Pant Operations and Assessment of Operational Aspects is not considered an EP function, it has been removed from NUGEG-0564. Accordingly, the plant Operations and Assessment of Operational Aspects function is not included in the proposed SEP, Table B-1, Minimum On-Shift and Augmented Staffing. PINGP continues to meet the operations staffing requirements of 10 CFR 50.54(m)(2)(i) and the PINGP Technical Specifications.

Emergency Direction and Control

a. In PINGP Emergency Plan, Revision 54[2], staffing, the Shift Manager was designated as the on-shift Emergency Director (ED) to fulfill the function of Emergency Direction and Control until augmented by the Technical Support Center (TSC) ED within 60 minutes of declaration of an Alert or higher emergency. An Emergency Operations Facility (EOF) Emergency Manager is augmented within 90 minutes of an Alert or higher declaration. The current PINGP Emergency Plan maintains these staffing requirements.

b. The proposed SEP retains the commitment for the Shift Manager to perform the ED function until augmented within 60 minutes by the TSC

2. PINGP Units 1 and 2 Emergency Plan, Revision 54, staffing was approved by the NRC in license Amendment Numbers 223 and 210, respectively, dated March 5, 2018 (ADAMS Accession Number ML17362A202).

ED and the EOF Emergency Manager within 90 minutes of an Alert or higher declaration.

The proposed change continues to meet the staffing guidance in accordance with NUREG-0654/FEMA REP-01, Revision 2.

Notification and Communication

a. In the SER approved PINGP Emergency Plan, Revision 54, staffing for the Notification and Communication functional area provided for one communicator on-shift augmented by two communicators at 60 minutes and two additional communicators at 90 minutes. The current PINGP Emergency Plan maintains this staffing for the Notifications function.

b. The proposed SEP provides for the addition of a second communicator position on-shift, while maintaining augmented response of two communicators at 60 minutes. The proposed change reduces the number of 90-minute responders for this function from two to one. This reduction in augmented staffing is a result of the reconfiguration of command-and-control assignments in the TSC and EOF. The proposed plan retains the Emergency Notification System (ENS) function in the TSC and does not transfer the function to the EOF. As a result, a second communicator in that facility is no longer required.

The proposed change continues to meet the staffing guidance in accordance with NUREG-0654/FEMA REP-01, Revision 2.

Radiological Accident Assessment and Support of Operational Accident Assessment

The function of on-site radiological assessment is to: review radiological conditions on site using data from available instrumentation, assess the impact of changing radiological conditions on emergency classification, assist in accident assessment based upon those changing radiological conditions, and recommend appropriate on-site protective measures. In PINGP Emergency Plan, Revision 58, this function consists of five major tasks: Emergency Operations Facility (EOF) Director; Off-Site Dose Assessment; Off-Site Surveys; On-Site (out-of-plant)/In-Plant Surveys; and Chemistry/Radio Chemistry.

Emergency Operations Facility (EOF) Director

a. In the PINGP Emergency Plan, Revision 54, staffing, classification was performed by the Shift Manager/ED using established implementing procedures. Off-site and onsite surveys provided additional information, such as direct radiation measurements, that can be directly applied to emergency classification. The classification function is transferred to the TSC ED. The EOF Emergency Manger position was augmented within 90 minutes. This organization is maintained in the current PINGP Emergency Plan.

b. The proposed SEP staffing continues to assign the classification task to the Shift Manager/ED and continues to be augmented by the TSC ED within 60 minutes. The EOF Emergency Manager continues to be augmented within 90 minutes.

The proposed change continues to meet the staffing guidance in accordance with NUREG-0654/FEMA REP-01, Revision 2.

Off-Site Dose Assessment

a. In the PINGP Emergency Plan, Revision 54, staffing, offsite dose assessment was assigned to the shift chemistry technician. Offsite dose assessment was augmented by the Radiological Emergency Coordinator in the TSC within 60 minutes and augmented at 90 minutes in the EOF by the Radiation Protection Supervisor (RPSS). The current PINGP Emergency Plan maintains this organization for performance of dose assessment on-shift.

b. The proposed SEP re-assigns the offsite dose assessment task from the on-shift Chemistry Technician to the Radiation Protection (RP) Technician as a collateral duty. The offsite dose assessment task continues to be augmented by a dose assessment specialist in the TSC at 60 minutes and further augmented in the EOF at 90 minutes.

As stated in Northern States Power Company (NSPM) letter to NRC, "License Amendment Request (LAR) to Revise Staff Augmentation Times in the Prairie Island Nuclear Generating Plant (PINGP) Emergency Plan", dated February 23, 2017, (ML17055C359), improvements in the dose assessment program related to implementation of URI and availability of data from the Emergency Response Computer System (ERCS) results in minimal user interface for completion of this activity. The adequacy of the proposed change in on-shift staffing assignment has been verified through a 10 CFR 50, Appendix E, Section IV.A.9 analysis and demonstrated that the change does not result in conflicts in on-shift responsibilities.

The proposed change continues to meet the staffing guidance in accordance with NUREG-0654/FEMA REP-01, Revision 2.

Off-Site Surveys

a. In the PINGP Emergency Plan, Revision 54, staffing, the off-site survey task was performed by an augmented two person offsite survey team within 60 minutes of event declaration. The task was further augmented within 90 minutes by a second two person offsite survey team. The current PINGP Emergency Plan maintains this on-shift and augmented response.

b. In the proposed SEP, the offsite survey task will be assigned to Field Monitoring Team (FMT) personnel. One FMT Monitor will be assigned to the TSC. In addition, one FMT Lead, and one FMT Member will continue to be augmented within 60 minutes and additional FMT Lead

and an additional FMT member will be augmented within 90 minutes of event declaration.

The above is consistent with NUREG-0654/FEMA REP-1, Revision 2, guidance.

On-Site Surveys (Out-of-Plant and In-Plant)

a. In the PINGP Emergency Plan, Revision 54, staffing, one on-shift radiation protection specialist was assigned to the on-site survey function and was augmented within 60 minutes to perform in-plant and out-of-plant surveys with an additional radiation protection specialist augmented at 90 minutes. The current PINGP Emergency Plan maintains the on-shift and augmented staffing for performance of on-site surveys.

b. In the proposed SEP, the on-site survey task will continue to be performed by one on-shift RP Technician and will be augmented by an RP Technician at 60 minutes and an additional RP technician at 90 minutes.

   The above is consistent with NUREG-0654/FEMA REP-1, Revision 2, guidance.

Chemistry/Radio Chemistry

a. In the PINGP Emergency Plan, Revision 54, staffing, the chemistry/radio chemistry task was assigned to one on-shift position. This position was augmented within 60 minutes. The on-shift Chemistry Technician also performed dose assessment, as needed. The current PINGP Emergency Plan maintains the on-shift and augmented staffing for chemistry/radiochemistry.

b. In the proposed SEP, the on-shift Chemistry Technician position is removed, and the chemistry/radio chemistry task is eliminated. Chemistry functions are maintained in accordance with site technical specifications governed by licensing processes outside the emergency plan. The proposed change is also aligned with NUREG-0654/FEMA-REP-1, Revision 2. The dose assessment function is reassigned to an RP Technician on-shift as described above.

Plant System Engineering, Repair and Corrective Actions

This functional area includes two tasks: Technical Support, and Repair and Corrective Actions.

Technical Support

a. In the PINGP Emergency Plan, Revision 54, staffing, the STA on-shift performed the core damage assessment function and was augmented by a Core Thermal Engineer within 60 minutes of declaration of an Alert or higher classification and by Mechanical and Electrical Engineers reporting to the TSC within 60 minutes of declaration of an

Alert or higher classification. The current PINGP Emergency Plan maintains the on-shift and augmented staffing for performance of engineering and technical support activities.

b. The proposed SEP remains unchanged regarding the Plant System Engineering function.

   The above is consistent with NUREG-0654/FEMA REP-1, Revision 2, guidance.

Repair and Corrective Actions

a. In the PINGP Emergency Plan, Revision 54, damage control and repair for electrical, mechanical, and instrument and control equipment was performed by one mechanical maintenance technician and one electrical maintenance technician reporting to the Operational Support Center (OSC) within 60 minutes of declaration of an Alert or higher classification, and one I&C technician reporting to the OSC within 90 minutes of declaration of an Alert or higher classification. In addition, mechanical maintenance, electrical maintenance, and instrument and control coordinators report to the OSC within 60 minutes. The current PINGP Emergency Plan maintains this augmented staffing for response in the area of repair and corrective actions.

b. In the proposed SEP, damage control and repair activities for electrical, mechanical, and instrument and control equipment continue to be performed by Mechanical and Electrical Maintenance personnel augmented at 60 minutes and an I&C Maintenance responder at 90 minutes.

   The proposed SEP also maintains response by one mechanical maintenance coordinator, one electrical maintenance coordinator and one instrument and control coordinator augmented within 90 minutes. In addition, the OSC coordinator will continue to be augmented within 60 minutes and will provide oversight for RP and maintenance personnel between 60 and 90 minutes. Finally, the radiation protection coordinator response time will be extended from 60 to 90 minutes.

   The above is consistent with NUREG-0654/FEMA REP-1, Revision 2, guidance.

Protective Action (In-Plant)

This functional area includes four tasks: Access control; Health Physics (HP) Coverage for repair, corrective actions, search and rescue first aid, and firefighting; personnel monitoring; and dosimetry.

a. In the PINGP Emergency Plan, Revision 54, staffing, one RP Specialist was assigned to functional area. The PINGP Emergency Plan provided for one RP Specialist to be augmented within 60 minutes and another augmented within 90 minutes. The current

PINGP Emergency Plan maintains this on-shift and augmented staffing.

b. In the proposed SEP, tasks included in the protective action functional area have been relocated to the Radiological Accident Assessment functional area to be consistent with the guidance in NUREG-0654/FEMA REP-1, Revision 2. The proposed PINGP Emergency Plan identifies one RP Technician to be assigned on-shift. As stated previously, the RP Technician assigned to the performance of protective action function will perform dose assessment activities as a collateral duty. Two additional RP Technicians will be augmented within 60 minutes and two additional RP Technicians will be augmented within 90 minutes.

   This is consistent with the guidance contained in NUREG-0654/FEMA REP-1, Revision 2.

Fire Fighting

a. In the PINGP Emergency Plan, Revision 54, staffing, the Fire Brigade is assigned in accordance with the Fire Protection Program. The current PINGP Emergency Plan maintains this reference.

b. In the proposed SEP, references to the Fire Brigade are removed as this function is governed under the site Fire Protection Program Plan. This change is consistent in the guidance contained in NUREG-0654/FEM/REP-1, Revision 2.

Rescue Operations and First Aid.

a. In the PINGP Emergency Plan, Revision 54, staffing, two on-shift individuals were assigned to the Rescue Operations and First Aid functional area, but the individuals could be assigned other responsibilities. The functional area was augmented by local support personnel. The current PINGP Emergency Plan maintains this staffing.

b. In the proposed SEP, assignment of the Rescue Operations and First Aid functional area is removed as these functions are governed under administrative procedures maintained outside the Emergency Plan . This change is consistent with the guidance described in NUREG-0654/FEM/REP-1, Revision 2, Table B-1.

Site Access Control and Personnel Accountability

a. In the PINGP Emergency Plan, Revision 54, staffing for the Site Access Control and Accountability functional area was fulfilled by the security force in accordance with the security plan. The current PINGP Emergency Plan maintains the reference for site access control and accountability.

b. In the proposed SEP, Site Access Control and Personnel Accountability is removed from the emergency plan as these activities

are governed under the Site Security Program. This change is consistent with NUREG 0654/FEMA REP-1, Revision 2, Table B-1.

Changes to the PINGP on-shift and augmented staffing tables continue to meet the intent of regulatory guidance as described in NUREG-0654/FEMA-REP-1, Table B-1, Revision 2. The on-shift staffing has been assessed in accordance with 10 CFR Part 50, Appendix E, Section IV.A.9 and determined that on-shift staff can support assigned EP functions as well as other assigned duties.

Changes to the ERO staffing assigned to the TSC, OSC, EOF, and Joint Information Center (JIC) are addressed on Attachment 4 of this Enclosure.

B.5 The proposed SEP PINGP Plan Annex states:

Contractor Support

- Westinghouse will provide technical support upon request.
- Environmental, Inc. Midwest Laboratory will provide laboratory support services for PINGP as needed.

Commitments in the proposed PINGP Plan Annex related to the specification of external organizations, including contractors, that may be requested to provide technical assistance to and augmentation of the ERO do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

D. Emergency Classification System

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Element Analysis:

D.1 The PINGP Plan Annex states that the PINGP EAL scheme is documented in Prairie Island Nuclear Generating Plant Emergency Action Levels, (EPLAN-05).

Commitments in the proposed PINGP Plan Annex related to the establishment and maintenance of a standard emergency classification and action level scheme do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

E. Notification Methods and Procedures

Procedures have been established for notification, by the licensee, of State and local response organizations and for notification of emergency personnel by all organizations; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway EPZ have been established.

Element Analysis:

E.1 The PINGP Plan Annex states that the site-specific state and county entities are notified of a declared emergency at PINGP are as follows:

- Minnesota Division of Homeland Security (HSEM)
- State of Wisconsin Emergency Management
- Goodhue County Sheriff
- Dakota County Sheriff
- Pierce County Sheriff
- Prairie Island Indian Community - Treasure Island Security Dispatch

Commitments in the proposed PINGP Plan Annex related to the establishment of provisions for notification of response organizations do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

E.2 The proposed SEP PINGP Plan Annex states that PINGP maintains an Alert and Notification System (ANS) that provides the administrative and physical means to complete the initial alerting and initiate notification of the public within the plume exposure pathway EPZ within about 15 minutes of the time that State and local officials are notified.

The PINGP ANS system consists of a fixed siren system providing 100% coverage of the populated area within the 10-mile EPZ with primary and backup activation and monitoring of capability; Emergency Alert System (EAS) with primary and backup initiation capability; Integrated Public Alert and Warning System (IPAWS) with primary and backup initiation capability; Wireless Emergency Alert (WEA) System; and county auto-dial notification systems.

Additional ANS capabilities are provided by PINGP at the Prairie Island Indian Community. An EAS Radio Receiver maintained by Xcel Energy is provided at the Prairie Island Indian Community Administrative Building. In addition, the ANS Siren located near the Prairie Island Indian Community Center can be activated from the TSC at a Site Area Emergency with a special “stutter tone” for the purpose of quickly notifying Prairie Island’s Indian tribal leaders

Activation of the ANS begins with a protective action recommendation (PAR) by the PINGP Emergency Director/Manager. The Minnesota Division of Homeland Security and Emergency Management (HSEM) is responsible for coordinating the recommendation and making it a decision with appropriate approvals from Pierce, Goodhue and Dakota Counties and the Wisconsin Emergency Management and assigning siren activation times and EAS activation times. The Dakota, Goodhue and Pierce County Sheriff’s Offices are responsible for activation of the outdoor warning sirens

Detailed information on the FEMA approved system used to alert and notify the general public is maintained in the Prairie Island Nuclear Generating Plant ANS Report (EPLAN-11).

Commitments in the proposed PINGP Plan Annex related to the description of the ANSs used to alert and notify the general public within the plume exposure pathway EPZ and methods of activation do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

F. Emergency Communications

Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

Element Analysis:

F.1 The proposed PINGP Plan Annex states that provisions exist for communications with applicable onsite and offsite emergency organizations.

The available communications systems are illustrated Table F.1.b, *PINGP Communications Matrix*. Refer to Attachment 5 for a comparative table of communication methods and interfaces and associated change justification.

Commitments in the proposed PINGP Plan Annex related to the description of the communication methods that may be used when contacting applicable organizations do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

F.3 The proposed PINGP Plan Annex states that systems used to communicate with the states of Minnesota and Wisconsin, Goodhue, Dakota and Pierce County, and Prairie Island Indian Community warning points will be tested monthly.

ANS siren silent testing is completed on a weekly frequency, activation testing is completed on a monthly frequency, and Prairie Island Indian Community stutter tone testing is on a monthly frequency in accordance with EPLAN 11, *Prairie Island Nuclear Generating Plant ANS Report*.

Commitments in the proposed PINGP Plan Annex related to the identification of testing methods and frequency for communication systems used for identified communication functions do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

H. Emergency Facilities and Equipment

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

Element Analysis:

H.1 The proposed PINGP Plan Annex states that the Technical Support Center (TSC) is located across the Turbine Building from Units 1 & 2 Control Room.

The PINGP TSC has the following capabilities:

- Sufficient working space for ERO and NRC personnel.
- Shielding, filtered ventilation, and access to thyroid blocking agents to provide habitability under accident conditions.
- Area radiation and continuous airborne monitors are provided to monitor radiological conditions in the facility.
- Primary and backup communication links to onsite and offsite emergency response centers.
- Access to plant procedures, documents, and records.
- The capability to record and display plant system, radiological, and meteorological parameters.

Commitments in the proposed PINGP Plan Annex related to establishing a TSC do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

H.2 The proposed PINGP Plan Annex states that the Operational Support Center (OSC) is located in the New Administration Building and is provided with the necessary equipment and communications links to support OSC emergency response actions.

Commitments in the proposed PINGP Plan Annex related to establishing a OSC do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

H.3 The proposed PINGP Plan Annex states that the PINGP Training Center has been designated for use as a near site location for the NRC and other off-site agency staff.

This location provides space for an NRC site team and Federal/state/local responders, space for conducting briefings with emergency response personnel, communication with other licensee and offsite emergency response facilities, access to plant data and radiological information, and access to copying equipment and office supplies.

Refer to Enclosure 4 for an evaluation and analysis of the proposed combined EOF.

H.4 The proposed PINGP Plan Annex states that the Red Wing Service Center (RWSC) has been designated as the PINGP alternative facility.

Commitments in the proposed PINGP Plan Annex related to establishing an alternative facility do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

H.8 The proposed PINGP Plan Annex states that:

Laboratory Facilities

PINGP environmental sampling is performed in accordance with PINGP Off-Site Dose Calculation manual (ODCM) and Technical Specifications.

Additional offsite laboratory services are available through an LOA established with Environmental, Inc. Midwest Laboratory.

Commitments in the proposed PINGP Plan Annex related to establishing site-specific provisions acquire data from offsite monitoring and analysis equipment do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

J. Protective Response

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. ETEs have been developed by applicants and licensees. Licensees shall update the ETEs on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

Element Analysis:

J.2 The proposed PINGP Plan Annex states that evacuation of onsite personnel to a suitable offsite location is accomplished using Xcel Energy vehicles and/or personal vehicles and is coordinated with the OROs. Pre-established primary and alternate routes have been established and are maintained in implementing procedures.

Commitments in the proposed PINGP Plan Annex related to providing and coordinating evacuation routes and transportation for onsite individuals do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

J.6 The proposed PINGP Plan Annex states that PINGP, in coordination with impacted OROs, has developed site specific precautionary measures for specific EPZ populations that may result in precautionary Protective Action Recommendations prior to reaching a General Emergency.

Precautionary measures may be warranted for the near site Treasure Island Casino and/or residents within a 2-mile radius under the following conditions:

- At an Alert or SAE declared for an HAB event, PINGP will make a recommendation that the Casino staff, Patrons, and residents within a 2-mile radius to stay indoors and continue to monitor radio/tv broadcasts for further information.

- At an SAE declared based on radiological effluents, PINGP will make a recommendation for Casino Shutdown and Dismissal of Staff and Patrons.

At an SAE, where the station will not deescalate in less than 2 hours and there is a potential for escalating to a General Emergency, PINGP will make a recommendation to implement a precautionary relocation of the population within a 10-mile radius of the plant for areas of restricted egress due to flooding.

Commitments in the proposed PINGP Plan Annex related to the establishment of the development of PARs for the responsible OROs for the plume exposure pathway EPZ do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

J.8 The proposed PINGP Plan Annex states that the PINGP ETE Report is documented in Prairie Island Nuclear Generating Plant Evacuation Time Estimates, EPLAN-09.

Commitments in the proposed PINGP Plan Annex related to providing and coordinating evacuation routes and transportation for onsite individuals do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

J.10 The proposed PINGP Plan Annex states that maps and other information showing site specific evacuation routes, evacuation areas, reception centers in host areas, and shelter areas are contained in the EPLAN-09, *Prairie Island Nuclear Generating Plant Evacuation Time Estimates*.

Maps and other information showing population distribution around PINGP, by evacuation area, are contained in EPLAN-09, *Prairie Island Nuclear Generating Plant Evacuation Time Estimates*.

Commitments in the proposed PINGP Plan Annex related to including maps, charts, or other information that demonstrate evacuation routes, evacuation arears, reception centers, and host areas and shelter areas for the plume exposure pathway EPZ, do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

L. Medical and Public Health Support

Arrangements are made for medical services for contaminated injured individuals.

Element Analysis:

L.2 The proposed PINGP Plan Annex states that the primary and backup offsite medical facilities to treat contaminated injured personnel from PINGP are:

Primary - Mayo Clinic Health System located in Red Wing, Minnesota

Backup - Regions Hospital in St. Paul, Minnesota

Commitments in the proposed PINGP Plan Annex related to the description of arrangements for the medical treatment of contaminated, injured onsite personnel and those onsite personnel who have received significant radiation exposures and/or significant uptakes of radioactive material do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

L.4 The proposed PINGP Plan Annex states that arrangements for transportation of radiologically contaminated casualties have been made with Red Wing Ambulance Service in Red Wing, Minnesota.

Commitments in the proposed PINGP Plan Annex related to the arrangement for the transportation of contaminated, injured individuals and the means to control contamination while transporting victims of radiological incidents to medical support facilities and the decontamination of transport vehicle following use do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

P. Responsibility for the Planning Effort: Development, Periodic Review, and Distribution of Emergency Plans

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

Element Analysis:

P.6 The proposed PINGP Plan Annex states that external emergency plans specific to the support of PINGP include the following:

- Goodhue County/Red Wing City Emergency Response Plan for the Prairie Island Nuclear Generating Plant
- Dakota County Emergency Response Plan for the Prairie Island Nuclear Generating Plant
- Pierce County Emergency Response Plan for the Prairie Island Nuclear Generating Plant
- Prairie Island Indian Community Emergency Response Plan for the Prairie Island Nuclear Generating Plant

Commitments in the proposed PINGP Plan Annex related to the arrangement for the transportation of contaminated, injured individuals and the means to control contamination while transporting victims of radiological incidents to medical support facilities and the decontamination of transport vehicle following use do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

P.7 The proposed PINGP Plan Annex states that the SEP, Appendix C contains a listing of the PINGP implementing/administrative procedures required to maintain and implement the emergency plan, and the section(s) of the emergency plan implemented by each procedure.

Commitments in the proposed PINGP Plan Annex related to including an appendix containing a listing by title of the procedures required to maintain and implement the emergency plan do not represent a material change from the current PINGP or Corporate Offsite Emergency Plan commitments.

3.0 CONCLUSION

The proposed changes continue to support the functional areas of the Emergency Plan, continue to ensure the protection of the health and safety of the public and site personnel, and will not present a significant burden to the on-shift personnel.

ENCLOSURE 3

ATTACHMENT 1

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

PRAIRIE ISLAND PLAN ANNEX

(EPLAN-03)

(18 Pages Follow)

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Emergency Preparedness Licensing Document		Page 1 of 18
Title:	**Prairie Island Plan Annex**	
Approval:		

Table of Contents

A. ASSIGNMENT OF RESPONSIBILITY

Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the EPZs have been assigned, the emergency responsibilities of the various supporting organization have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

Regulatory References: 10 CFR 50.47(b)(1); 44 CFR 350.5(a)(1)

A.1	The Federal, state, local, and tribal governments, licensee, and other private sector organizations that comprise the overall response for the EPZs are identified.
A.1.a	The organizations having an operational role specify their concept of operations and relationship to the total effort.

County Organizations

The county and municipal governments with an operational role within the Prairie Island Nuclear Generating Plant (PINGP) 10-mile EPZ as depicted in Figure 1 are:

- Goodhue County, Minnesota
- Dakota County, Minnesota
- City of Red Wing, Minnesota
- Pierce County, Wisconsin

The county governments having an operational role within the PINGP 50-mile Ingestion Pathway Zone (IPZ) as depicted in Figure 2 are:

Minnesota					**Wisconsin**	
Anoka	Dodge	Olmsted	Steele	Winona	Barron	Pepin
Carver	Goodhue	Ramsey	Wabasha		Buffalo	Pierce
Chisago	Hennepin	Rice	Waseca		Dunn	Polk
Dakota	Le Sueur	Scott	Washington		Eau Claire	St Croix

Tribal Organizations

The Prairie Island Indian Community (PIIC) is located within the PINGP 10-mile EPZ, as depicted in Figure 1, and has an Emergency Operations Plan that includes the description of tribal responsibilities during a nuclear plant declared event.

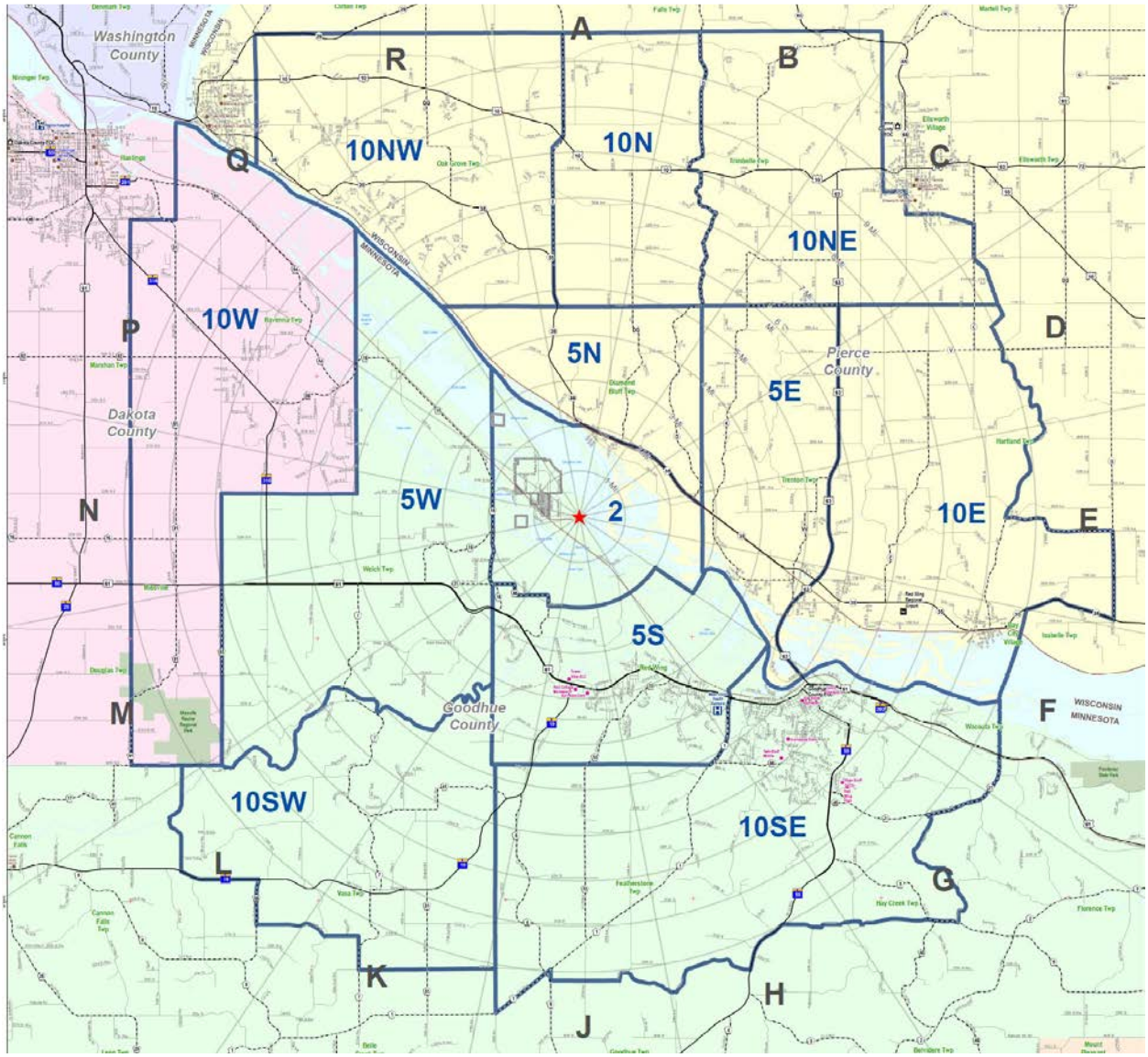

Figure 1 – PINGP 10-Mile Plume Exposure Pathway Zone (EPZ)

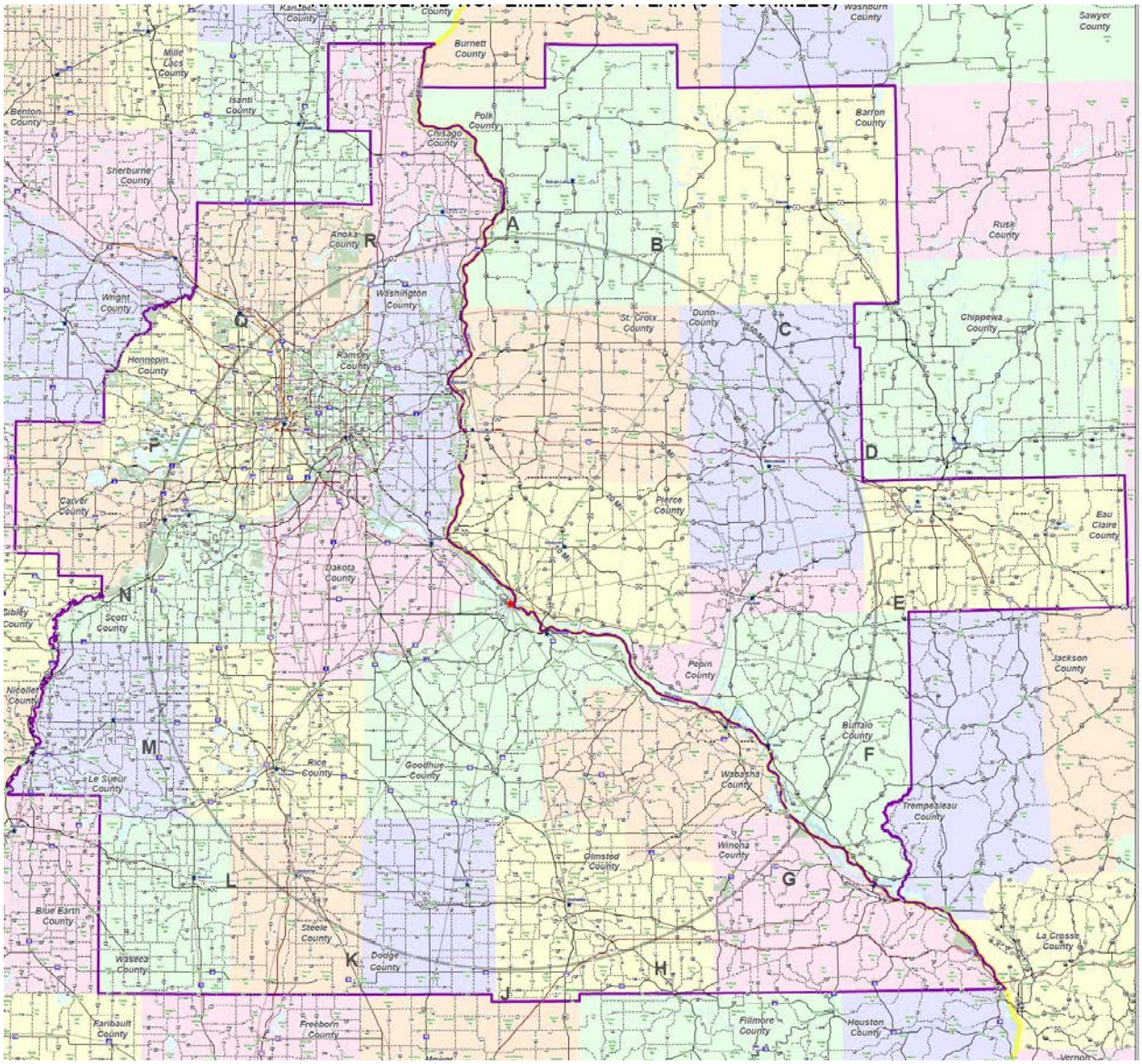

Figure 2 – PINGP 50-Mile Ingestion Pathway Zone (IPZ)

A.4	Written agreements with the support organizations having an emergency response role within the EPZs are referenced. The agreements describe the concept of operations, emergency response measures to be provided, mutually acceptable criteria for their implementation, and arrangements for exchange of information.

Site-specific letters of agreement (LOAs) are maintained by PINGP with the following organizations:

- State of Wisconsin
- Goodhue County Emergency Management
- Dakota County Emergency Services
- Pierce County Emergency Management
- City of Redwing
- Prairie Island Indian Community
- Mayo Clinic Health System – Red Wing
- Sacred Heart Hospital
- Westinghouse Electric Company
- Environmental, Inc. Midwest Laboratory
- Canadian Pacific Railway

B. EMERGENCY RESPONSE ORGANIZATION (ERO)

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

Regulatory References: 10 CFR 50.47(b)(2); 44 CFR 350.5(a)(2);
10 CFR Part 50, Appendix E.IV.A

B.1	The emergency plan specifies how the requirements of 10 CFR 50.47(b)(2) and the applicable sections of Appendix E to 10 CFR Part 50 are met.

B.1.a	The site-specific emergency response organization (ERO) is developed. Note that while other site programs, such as operations, fire response, rescue and first aid, and security, may be controlled via other licensing documents, it is only when these personnel are assigned EP functions that they become part of this regulatory standard. Consideration is given to ensure that EP functions are not assigned to individuals who may have difficulties performing their EP function(s) simultaneously with their other assigned (non-EP) duties. Appendix E to 10 CFR Part 50 requires licensees to perform an on-shift staffing analysis to ensure on-shift staff can support the EP functions assigned, as well as other assigned duties.

The PINGP on-shift staffing analysis has been developed in accordance with 10 CFR 50 Appendix E.IV.A.9 and NEI 10-05.

The PINGP on-shift staffing analysis is documented in EPLAN-09, On-Shift Staffing Analysis Report, and is maintained in the Document Records Management System.

B.5	The external organizations, including contractors, that may be requested to provide technical assistance to and augmentation of the ERO, as applicable, are specified.

Contractor Support

- Westinghouse will provide technical support upon request.
- Environmental, Inc. Midwest Laboratory will provide laboratory support services for PINGP as needed.

D. EMERGENCY CLASSIFICATION SYSTEM

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Regulatory References: 10 CFR 50.47(b)(4); 44 CFR 350.5(a)(4);
10 CFR Part 50 Appendix E.IV.B and C

D.1	A standard emergency classification and action level scheme is established and maintained. The scheme provides detailed EALs for each of the four ECLs in Section IV.C.1 of Appendix E to 10 CFR Part 50.

The PINGP EAL scheme is documented in EPLAN-05, Prairie Island Nuclear Generating Plant Emergency Action Levels.

E. NOTIFICATION METHODS AND PROCEDURES

Procedures have been established for notification, by the licensee, of State and local response organizations and for notification of emergency personnel by organization; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway EPZ have been established.

Regulatory References: 10 CFR 50.47(b)(5); 44 CFR 350.5(a)(5)

E.1	The mutually agreeable process for direct and prompt notification of response organizations, aligned with the emergency classification and action level scheme, is described.
E.1.a	Provisions for notification of response organizations are established, including the means for verification of messages.

The site-specific state and county entities are notified of a declared emergency at PINGP are as follows:

- Minnesota Division of Homeland Security (HSEM)
- State of Wisconsin Emergency Management
- Goodhue County Sheriff
- Dakota County Sheriff
- Pierce County Sheriff
- Prairie Island Indian Community - Treasure Island Security Dispatch

E.2	The alert and notification systems (ANSs) used to alert and notify the general public within the plume exposure pathway EPZ and methods of activation are described. This description includes the administrative and physical means, the time required for notifying and providing prompt instructions to the public within the plume exposure pathway EPZ, and the organizations or titles/positions responsible for activating the system.

PINGP maintains an ANS that provides the administrative and physical means to complete the initial alerting and initiate notification of the public within the plume exposure pathway EPZ within about 15 minutes of the time that State and local officials are notified.

The PINGP ANS system consists of a fixed siren system providing 100% coverage of the populated area within the 10-mile EPZ with primary and backup activation and monitoring of capability; Emergency Alert System (EAS) with primary and backup initiation capability; Integrated Public Alert and Warning System (IPAWS) with primary and backup initiation capability; Wireless Emergency Alert (WEA) System; and county auto-dial notification systems.

Additional ANS capabilities are provided by PINGP at the Prairie Island Indian Community. An EAS Radio Receiver maintained by Xcel Energy is provided at the Prairie Island Indian Community Administrative Building. In addition, the ANS Siren located near the Prairie Island Indian Community Center can be activated from the TSC at a Site Area Emergency (SAE) with a special “stutter tone” for the purpose of quickly notifying Prairie Island’s Indian tribal leaders.

Activation of the ANS begins with a protective action recommendation (PAR) by the PINGP Emergency Director/Manager. The Minnesota Division of Homeland Security and Emergency Management (HSEM) is responsible for coordinating the recommendation and making it a decision with appropriate approvals from Pierce, Goodhue and Dakota Counties and the Wisconsin Emergency Management and assigning siren activation times and EAS activation times. The Dakota, Goodhue and Pierce County Sheriff’s Offices are responsible for activation of the outdoor warning sirens.

Detailed information on the FEMA approved system used to alert and notify the general public is maintained in EPLAN-11, Prairie Island Nuclear Generating Plant ANS Design Report.

F. EMERGENY COMMUNICATIONS

Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

Regulatory References: 10 CFR 50.47(b)(6); 44 CFR 350.5(a)(6).

F.1	Each principal response organization establishes redundant means of communication and addresses the following provisions:
F.1.b	Communication with applicable organizations to include a description of the methods that may be used when contacting each organization.

Provisions exist for communications with applicable onsite and offsite emergency organizations. The available communications systems are illustrated Table F.1.b, PINGP Communications Matrix.

Table F.1.b - PINGP Communications Matrix

	Commercial Telephones	Plant/Xcel Energy Phones	Mobile Devices	Plant Page System	NAWAS	ERDS	Facsimile and/or Scan/E-mail	Xcel Radio Network	Auto Ring Direct Dialing Phone	ERO Notification System	Satellite Phones	USNRC - Communications
Control Room	X	X		X		X		X	X	X	X	X
TSC	X	X	X	X	X	X	X	X	X	X	X	X
OSC	X	X	X	X				X			X	
EOF	X	X	X				X	X			X	X
NRC Near Site Facility	X	X										
PINGP Alternative Facility	X	X	X					X		X		X
Monticello NGP	X	X					X					
Plant Areas	X	X		X				X				
Field Monitoring Teams			X					X			X	
PINGP Security	X	X	X	X				X				
Xcel Energy System Dispatcher	X	X						X	X			
PINGP Key Personnel	X		X							X		
MN/HSEM – EOC	X						X	X	X			
MN Duty Officer/State Patrol	X							X			X	
Goodhue Co. Sheriff	X						X	X			X	
Goodhue-Red Wing EOC	X						X	X			X	
Red Wing Police/Fire	X											
Red Wing Hospital	X						X					
PIIC	X						X	X			X	
Dakota Co. Sheriff	X						X	X			X	
Dakota Co. EOC	X						X	X			X	
WI/WEM – EOC	X				X		X					
WI/WEM – Eau Claire	X				X							
Pierce Co. Sheriff	X				X		X	X			X	
Pierce Co. EOC	X				X		X	X				
WI/State Patrol	X				X						X	
USNRC/HQ	X					X	X					X
USNRC/REG III	X											X
USNRC/Resident Insp.	X	X	X	X								
National Weather Service	X											

F.3	The testing method and periodicity for each communication system used for the functions identified in evaluation criteria E.2, F.1, and F.2 are described.

Systems used to communicate with the states of Minnesota and Wisconsin, Goodhue, Dakota and Pierce County, and Prairie Island Indian Community warning points will be tested monthly.

ANS siren silent testing is completed on a weekly frequency, activation testing is completed on a monthly frequency, and Prairie Island Indian Community stutter tone testing is on a monthly frequency in accordance with EPLAN-11, Prairie Island Nuclear Generating Plant ANS Design Report.

H. EMERGENCY FACILITIES AND EQUIPMENT

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

Regulatory References: 10 CFR 50.47(b)(8); 44 CFR 350.5(a)(8)

H.1	A TSC is established, using current Federal guidance, from which NPP conditions are evaluated and mitigative actions are developed.

The Technical Support Center (TSC) is located across the Turbine Building from Units 1 & 2 Control Room.

The PINGP TSC has the following capabilities:

- Sufficient working space for ERO and NRC personnel .
- Shielding, filtered ventilation, and access to thyroid blocking agents to provide habitability under accident conditions.
- Area radiation and continuous airborne monitors are provided to monitor radiological conditions in the facility.
- Primary and backup communication links to onsite and offsite emergency response centers.
- Access to plant procedures, documents, and records.
- The capability to record and display plant system, radiological, and meteorological parameters.

H.2	An OSC is established, using current Federal guidance, from which repair team activities are planned and teams are dispatched to implement actions.

The Operational Support Center (OSC) is located in the New Administration Building and is provided with the necessary equipment and communications links to support OSC emergency response actions.

H.3	An EOF is established, using current Federal guidance, as the primary base of emergency operations for the licensee during a radiological incident. The EOF facilitates the management and coordination of the overall emergency response, including the sharing of information with Federal, state, local, and tribal government authorities.
H.3.a	For an EOF that is located more than 25 miles away from the NPP site, provisions are made for locating NRC and offsite responders closer to the NPP site.

The PINGP Training Center has been designated for use as a near site location for the NRC and other off-site agency staff.

This location provides space for an NRC site team and Federal/state/local responders, space for conducting briefings with emergency response personnel, communication with other licensee and offsite emergency response facilities, access to plant data and radiological information, and access to copying equipment and office supplies.

H.4	An alternative facility (or facilities) is established, using currently provided and/or endorsed guidance, which would be accessible even if the NPP site is under threat of or experiencing hostile action.

The Red Wing Service Center (RWSC) has been designated as the Alternative Facility.

H.8	Provisions are made to acquire data from offsite monitoring and analysis equipment, including data on geophysical phenomena (e.g., meteorological, hydrologic, and seismic monitors) and radiological data (e.g., from FMTs, environmental dosimeters, and laboratory analyses).

Laboratory Facilities

PINGP environmental sampling is performed in accordance with the PINGP ODCM and Technical Specifications.

Additional offsite laboratory services are available through an LOA established with Environmental, Inc. Midwest Laboratory.

J. PROTECTIVE RESPONSE

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. ETEs have been developed by applicants and licensees. Licensees shall update the ETEs on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

Regulatory References: 10 CFR 50.47(b)(10); 44 CFR 350.5(a)(10)

J.2	Provisions are made and coordinated with appropriate offsite entities for evacuation routes and transportation for onsite individuals to a suitable offsite location. Selection of location considers the potential for inclement weather, high traffic density, and potential radiological conditions. Alternate location(s) and route(s) are identified.

Evacuation of onsite personnel to a suitable offsite location is accomplished using Xcel Energy vehicles and/or personal vehicles and is coordinated with the OROs. Primary and alternate routes have been established and are maintained in implementing procedures.

J.6	The basis and methodology are established for the development of PARs for the responsible OROs, including evacuation, sheltering, and, if appropriate, radioprotective drug use, for the plume exposure pathway EPZ.

PINGP, in coordination with impacted OROs, has developed site specific precautionary measures for specific EPZ populations that may result in precautionary Protective Action Recommendations prior to reaching a General Emergency.

Precautionary measures may be warranted for the near site Treasure Island Casino and/or residents within a 2 mile radius under the following conditions:

- At an Alert or SAE declared for an HAB event, PINGP will make a recommendation that the Casino staff, Patrons, and residents within a 2-mile radius to stay indoors and continue to monitor radio/tv broadcasts for further information.
- At an SAE declared based on radiological effluents, PINGP will make a recommendation for Casino Shutdown and Dismissal of Staff and Patrons.

At an SAE, where the station will not deescalate in less than 2 hours and there is a potential for escalating to a General Emergency, PINGP will make a recommendation to implement a precautionary relocation of the population within a 10-mile radius of the plant for areas of restricted egress due to flooding.

J.8	The latest ETEs are:
J.8.a	Incorporated either by reference or in their entirety into the emergency plan.

The PINGP ETE Report is documented in EPLAN-09, Prairie Island Nuclear Generating Plant Evacuation Time Estimates.

J.10	Plans include maps, charts, or other information that demonstrate the following for the plume exposure pathway EPZ:
J.10.a	Evacuation routes, evacuation areas, reception centers in host areas, and shelter areas.

Maps and other information showing site-specific evacuation routes, evacuation areas, reception centers in host areas, and shelter areas are contained in EPLAN-09, Prairie Island Nuclear Generating Plant Evacuation Time Estimates.

J.10.b	Population distribution around the NPP site by evacuation areas.

Maps and other information showing population distribution around PINGP, by evacuation area, are contained in EPLAN-09, Prairie Island Nuclear Generating Plant Evacuation Time Estimates.

L. MEDICAL AND PUBLIC HEALTH SUPPORT

Arrangements are made for medical services for contaminated injured individuals.

Regulatory Reference: 10 CFR 50.47(b)(12); 44 CFR 350.5(a)(12)

L.2	Arrangements for the medical treatment of contaminated, injured onsite personnel and those onsite personnel who have received significant radiation exposures and/or significant uptakes of radioactive material are described. These arrangements include the following components:
L.2.b	Primary and backup offsite medical facilities.

The primary and backup offsite medical facilities to treat contaminated, injured personnel from PINGP are:

Primary - Mayo Clinic Health System located in Red Wing, Minnesota

Backup – Regions Hospital in St. Paul, Minnesota

L.4	Each organization arranges for the transportation of contaminated, injured individuals and the means to control contamination while transporting victims of radiological incidents to medical support facilities and the decontamination of transport vehicle following use.

Arrangements for the transportation of radiologically contaminated casualties have been made with Red Wing Ambulance Service in Red Wing, Minnesota.

P. RESPONSIBILITY FOR THE PLANNING EFFORT: DEVELOPMENT, PERIODIC REVIEW AND DISTRIBUTION OF EMERGENCY PLANS

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

Regulatory References: 10 CFR 50.47(b)(16); 44 CFR 350.5(a)(16)

P.6	A listing of annexes, appendices, and supporting plans and their originating agency is included in the emergency plan.

External emergency plans specific to the support of PINGP include the following:

- Goodhue County/Red Wing City Emergency Response Plan for the Prairie Island Nuclear Generating Plant
- Dakota County Emergency Response Plan for the Prairie Island Nuclear Generating Plant
- Pierce County Emergency Response Plan for the Prairie Island Nuclear Generating Plant
- Prairie Island Indian Community Emergency Response Plan for the Prairie Island Nuclear Generating Plant

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.

The Standard Emergency Plan (SEP), Appendix C contains a listing of the PINGP implementing/administrative procedures required to maintain and implement the emergency plan, and the section(s) of the emergency plan implemented by each procedure.

REFERENCE DOCUMENTS

1. 10 CFR 50.47; Emergency Plans

2. 10 CFR 50, Appendix E; Emergency Planning and Preparedness for Production and Utilization Facilities

3. NUREG-0654/FEMA-REP-1, REV. 2; Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants

ENCLOSURE 3

ATTACHMENT 2

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

XCEL ENERGY CORPORATE EMERGENCY PLAN JUSTIFICATION MATRIX

(79 Pages Follow)

Xcel Energy Corporate Emergency Plan – Change Justification Matrix

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
	Section 1.0 Purpose	**Section I – Introduction**	
2.	1.1		
3.	In accordance with license conditions, 10 CFR Part 50 and Nuclear Regulatory Commissioned (NRC) regulatory guidance, the Northern States Power Company, a Minnesota Corporation (NSPM) d/b/a Xcel Energy has developed and implemented emergency response plans for both of its operating nuclear power sites' and off-site response organizations.	**Section I, Introduction, Purpose** In accordance with license conditions, 10 CFR Part 50, and NRC Regulatory Guidance, the Standard Emergency Plan (SEP) provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to power plants operated by Xcel Energy, and plant employees. Xcel Energy operates the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP).	Wording modified to eliminate references to Offsite Plans controlled through FEMA approval of those plans.
4.	These combined plans constitute Monticello and Prairie Island's Emergency Response Plan.	**Section I, Introduction, Scope** Xcel Energy Chief Nuclear Officer has overall responsibility for maintaining a state of readiness to implement this Plan for the protection of plant personnel, the general public, and property from hazards associated with nuclear power generation facility operated by the company. The SEP describes the organization, facilities, training, and maintenance of both onsite and offsite facilities and equipment available to implement the plan.	Terminology updated to reflect incorporation of the Standard Plan concept as proposed by this submittal. Wording aligns scope with NUREG-0654 terminology.
5.	NSPM is a subsidiary of Xcel Energy Corporation and operates Monticello and Prairie Island Nuclear Power Sites. As asset owner Xcel Energy retains all owner obligations.	**Section I, Introduction, Purpose** The Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy	Terminology updated to reflect the Standard Plan concept applicable to both sites proposed by this submittal.
6.	1.2		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
7.	In support of the planning effort at these fixed nuclear facilities, supplemental emergency response plans have been developed by organizations outside of and within the NSPM/Xcel Energy. These include response plans developed by the States of Minnesota, Wisconsin (a state contiguous to NSPM/Xcel Energy Prairie Island site) and Prairie Island Indian Community.	**Section I, Introduction, Scope** There are supporting and complementing emergency plans, including those of federal agencies, the states of Minnesota and Wisconsin, the Prairie Island Indian Community and risk counties.	Language consolidated as it applies to related offsite plans. No change in the actual offsite plans themselves.
8.	Response plans have also been developed by counties (in both states) which are within the emergency planning zones at either Monticello or Prairie Island Nuclear Generating plants.		
9.	Response arrangements have been developed with various service oriented organizations in support of both sites. These include such entities as hospitals, ambulance services, federal radiological emergency response teams, contractor laboratories, vendors and consultants. These arrangements are documented in a list of "letters of agreement" attached in Attachment 5 to this plan.	**Section C.2.d** Agreements with state and county response organizations have been established through the integrated development of their respective emergency plans. **Section C.4** Contract Laboratories Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide environmental sample analysis services and are listed in the site-specific annexes.	No change in responsibilities for establishing and maintaining agreements with various supporting agencies. Language aligned to Standard Plan and organization as defined in NUREG-0654, Revision 2.
10.	NSPM/Xcel Energy Chief Nuclear Officer is ultimately responsible for ensuring a well prepared and adequately staffed Emergency Response Organization (ERO) is in place for both the On-site and Off-site organizations.	**Section I, Introduction, Scope** Xcel Energy Chief Nuclear Officer has overall responsibility for maintaining a state of readiness to implement this Plan for the protection of plant personnel, the general public, and property from hazards associated with nuclear power generation facility operated by the company.	Sections consolidated in the proposed Emergency Plan to provide a clear statement of responsibility. No change in practice or intent was made.
11.	NSPM/Xcel Energy's Chief Nuclear Officer ensures this by requiring strict compliance to the Emergency Plans.		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
12.	This plan can be implemented in response to emergencies at either Monticello or Prairie Island nuclear facilities. It coordinates the resources of the NSPM/Xcel Energy and other supporting departments.	**Section I. Introduction, Purpose** In accordance with license conditions, 10 CFR Part 50, and NRC Regulatory Guidance, the Standard Emergency Plan (SEP) provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to power plants operated by Xcel Energy, and plant employees. Xcel Energy operates the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP).	Applicability language modified to align with Standard Plan concept. No change in overall applicability.
13.	The emergency response planning effort consists of three phases: 1. The Response 2. Offsite Assistance 3. The Recovery	No equivalent statement	Original language is part of the Planning Basis for Section I of NUREG-0654, Revision 1. Adoption of the Standard Classification scheme (Section D of the Standard Plan) provides the overall response concept.
14.	The Response Phase is that period of time immediately following the classification of an emergency condition. Responses during this phase are those actions which are taken by site personnel to reduce consequences of the emergency condition. Each site plan directs actions during this period and is designed to interface with other response plans if it becomes necessary to utilize outside assistance.	No equivalent statement	Original language is part of the Planning Basis for Section I of NUREG-0654, Revision 1. Adoption of the Standard Classification scheme (Section D of the Standard Plan) provides the overall response concept.
15.	The Offsite Assistance Phase commences when organizations other than the affected sites are used to assist the site in response to the emergency. The response effort described in this Plan is designed for the Offsite Assistance Phase.	No equivalent statement	Original language is part of the Planning Basis for Section I of NUREG-0654, Revision 1. Adoption of the Standard Classification scheme (Section D of the Standard Plan) provides the overall response concept.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
16.	The Monticello and Prairie Island Offsite Nuclear Emergency Plan organizes the total resources of the NSPM/Xcel Energy to facilitate support of the affected site. Activation of the Monticello and Prairie Island Offsite Response Organization (ORO), and state, federal, and local governmental response organizations are associated with this phase.	**Section I, Introduction, Purpose** In accordance with license conditions, 10 CFR Part 50, and NRC Regulatory Guidance, the Standard Emergency Plan (SEP) provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to power plants operated by Xcel Energy, and plant employees. Xcel Energy operates the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP).	Language modified to align with the Standard Plan concept. No change was made to the responsibility of NSPM in response to activation of the Emergency Plan.
17.	The Recovery Phase commences when the Emergency Director, Emergency Manager, Plant Manager, and the Recovery Manager agree that all Emergency Organization activities in progress can be safely transferred to the Recovery Organization, and a punch list of short-term and long-term projects have been identified and prioritized, and consultation has occurred with the NRC.	**Section M.3** Implementing procedures provide guidance to directly terminate from an Unusual Event, Alert and Site Area Emergency with no long-term plant damage classifications when a normal outage organization is able to address any plant issues, or to transition to a recovery organization. The Emergency Director in consultation with the Emergency Manager, determines when conditions warranting an emergency declaration have passed and steps will be taken to terminate directly from the event or transition to a recovery organization.	Recovery requirements and structure including the organization are provided as Section M of the Standard Plan.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
18.	The methodology for the transition to the Recovery Phase is specified in the site Emergency Plan Implementing Procedures.	**Section M.3** Implementing procedures provide guidance to directly terminate from an Unusual Event, Alert and Site Area Emergency with no long-term plant damage classifications when a normal outage organization is able to address any plant issues, or to transition to a recovery organization. The Emergency Director in consultation with the Emergency Manager, determines when conditions warranting an emergency declaration have passed and steps will be taken to terminate directly from the event or transition to a recovery organization. Recovery from an emergency situation is guided by the following principles: • The protection of the public health and safety is the foremost consideration in formulating recovery plans. • Public officials would be kept informed of recovery plans so that they can properly carry out their responsibilities to the public. • Periodic information would be provided to the news media so that they can provide information to the public regarding recovery plans and progress made.	Recovery requirements and structure including the organization are provided as Section M of the Standard Plan.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
19.	The methodology for the transition to the Recovery Phase is specified in the site Emergency Plan Implementing Procedures.	**Section M.3, (continued)** • Periodic status reports would be given to company employees at other locations and to government and industry representatives. The Emergency Manager will take the following steps to inform members of the EOF, site organization, and off-site agencies that recovery operations are being initiated and that activities associated with bringing the plant to a safe shutdown condition are completed: • Develop a brief message as to the time and date of recovery operations initiation as well as any necessary organizational realignments.	Recovery requirements and structure including the organization are provided as Section M of the Standard Plan.
20.	**Section 2.0 Applicability**		
21.	2.1		
22.	This plan can be implemented in response to emergency at either Monticello or Prairie Island Nuclear Generating Plants.	**Section I, Introduction, Purpose** In accordance with license conditions, 10 CFR Part 50, and NRC Regulatory Guidance, the Standard Emergency Plan (SEP) provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to power plants operated by Xcel Energy, and plant employees. Xcel Energy operates the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP).	No change in coverage of the existing plans. Standard Plan logic consolidated to align with single plan proposal.
23.	**Section 3.0 Responsibilities**		
24.	Monticello and Prairie Island Nuclear Generating Plants will activate their respective emergency organization independent of offsite assistance.	No equivalent statement	Intent of the original site plans was to activate separately without dependence on any offsite licensee personnel. Standard Plan has no equivalence since corporate personnel are now an integral part of the ERO.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
25.	The site staff is responsible for taking the immediate actions to mitigate the emergency and limit the adverse effects.	**Section B.1.a** A description of the normal site operating organization is contained in each sites USAR. The requirements for on-shift operations staff, security force staff, and fire brigade and first aid staff are controlled by site-specific Technical Specifications and other site-specific licensing and administrative documents. Positions from these departments are contained in the emergency plan only when assigned an EP function that is performed during an event. Site-specific on-shift staffing analysis reports are developed in accordance with 10 CFR 50 Appendix E.IV.A.9 and NEI 10-05. (EPLAN-08, EPLAN-09)	Intent of the original site plans was to activate separately without dependence on any offsite licensee personnel. Standard Plan has no equivalence since corporate personnel are now an integral part of the ERO.
26.	The time taken to completely activate the Monticello or Prairie Island Emergency Response Organization will not adversely affect the site's response to the emergency condition.	No equivalent statement	Statement deleted and specific ERO Activation times are aligned with NUREG-0654, Revision 2, and documented in the Standard Plan Table B-1.
27.	The Monticello and Prairie Island Offsite Emergency Response Organization is shown in Attachment 1. Methods are established in procedures to ensure that the necessary personnel are available to staff required positions or that alternates are specified.	**Section B.1.a** Figures B-1, B-2, B-3, B-4 **Section F.1.c,** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	Figures contained in Section B defines the ERO. The detailed analysis of the augmented ERO is provided in Enclosure 1 Section B.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
28.	The following is a description of key members of the Monticello and Prairie Island Offsite Emergency Response Organization. The site emergency organizations are described in the site plans.	**Section B.1.a** The ERO is composed of the following positions and assigned responsibilities:	Language consolidated. No change in intent.
29.	Section 3.1 Responsibilities of NSPM/Xcel Energy's Offsite Emergency Response Organization Positions	**Section B.1.a**	The detailed comparison of the augmented ERO is provided in Enclosure 1 Section B.
30.	3.1.1 Xcel Communications	No equivalent description	Corporate Plan maintained a general description of the Xcel Communications group. Standard Plan provides the description of the JIC and the response as defined in the Standard Emergency Plan.
31.	This group is represented by the Xcel Energy Communications staff.	**Section G.** The JIC is staffed at an Alert or higher classification by Xcel Energy Corporate Communications personnel to ensure coordination with affected agencies and provide public information to the media and the public.	Language modified to focus on the Emergency Response to a classified event. Statement of purpose and activation requirements are specifically identified in the Standard Plan.
32.	Staffing of these positions is ensured by use of a call list of qualified designees.	**Section B.1.a, Figure B-4** **Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO.	Language modified to identify JIC as designated 90-minute responders within the ERO callout.

33.	The Director of Communications is responsible for the management of NSPM/Xcel Energy public information efforts and to advise NSPM/Xcel Energy Executive Management on public affairs. The responsibilities and authorities are listed below: • Provide a media representative for communication with the various media personnel. • Ensure that requests for public information by NSPM/Xcel Energy Executive Management are acted upon. • Coordinate the efforts of ERO communications personnel at corporate offices and at the state EOC/JIC. • Ensure that there is a timely exchange of information among spokespersons for the responding agencies and that there are coordinated arrangements for dealing with rumors. • Ensure that requests for communications resources are acted upon in a timely fashion. • Ensure information flow to appropriate federal, state and local government officials not directly involved in the emergency response effort. • If requested by the Emergency Manager, consider dispatching a Communications Representative to the site to support local Media related issues.	**Section B.1.a** JIC Manager • Coordinate the efforts of Xcel Energy personnel at the state EOC/JIC. • Provide oversight for public information requests.	Language modified to define responsibilities of the ERO members responding to the JIC. Non-responding personnel are not assigned responsibilities.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
34.	3.1.2 Executive Spokesperson	**Section B.1.a** Executive Spokesperson • Serve as the Xcel Energy spokesperson for major media meetings and conferences held at the Minnesota state EOC/JIC. • Supply information to ERO communications personnel who develop media releases at the state EOC/JIC. • Represent Xcel Energy at the state EOC/JIC by interfacing with state officials. • Ensure adequate liaison occurs between Xcel Energy representatives and state and county management. • Establish 24-hour shift coverage for JIC Staff.	Language provides more specific expectations for the position. No change in intent of the responder's actions as the integrated JIC as evolved.
35.	The Executive Spokesperson with the assistance of Technical Resource personnel will be responsible for directing the efforts of NSPM/Xcel Energy personnel at the State EOC and the Joint Information Center. Additionally, this individual will be the designated NSPM/Xcel Energy Spokesperson in attendance for media conferences.		
36.	The individual designated to fill this position will have the following responsibilities: • Serve as the NSPM/Xcel Energy spokesperson for major media meetings and conferences held at the Minnesota state EOC/JIC. • Supply information to ERO communications personnel who develop media releases at the state EOC/JIC. • Represent NSPM/Xcel Energy at the state EOC/JIC by interfacing with state officials. • Ensure adequate liaison occurs between NSPM/Xcel Energy representatives and state and county management. • Serve on the JIC Management Committee. • Establish 24-hour shift coverage for JIC Staff.		
37.	3.1.3 Technical Resource Staff	**Section B.1.a, p. 18** Technical Advisor	
38.	The individuals designated to fill this position will have the following responsibilities: 1. Assist the Executive Spokesperson in supplying information to the ERO communications personnel located at the JIC/EOC.	• Brief the Executive Spokesperson on plant conditions and technical aspects of the event.	Responsibilities revised to align with evolution of a single voice response for the utility. Technical Advisor focus in the Standard Plan is advisor rather than potential spokesperson.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
39.	2. Act as the Executive Spokesperson in his or her absence. 3. As an NSPM/Xcel Energy technical representative, assist other personnel at the JIC/EOC.	No equivalent statement	Responsibilities revised to align with evolution of a single voice response for the utility. Technical Advisor focus in the Standard Plan is advisor rather than potential spokesperson.
40.	3.1.4 State Liaison	**Section B.1.a** State Liaison	
41.	The State Liaison Representative works for the Executive Spokesperson and is at the Executive Spokespersons disposal to provide Liaison between NSPM/Xcel Energy and the State Agencies.	**Figure B-4, JIC Organization**	No Change. JIC Organization as defined in Section B-4 designates reporting chain to the Executive spokesperson.
42.	The State Liaison Representative will have the following responsibilities: 1. Provide an interface between NSPM/Xcel Energy and various state agencies of both Minnesota and Wisconsin. 2. Assist the state in understanding NSPM/Xcel Energy's response efforts to the emergency situation. 3. Facilitate the answering of any questions the state has concerning NSPM/Xcel Energy's response efforts. 4. Ensure that information being provided to the state accurately reflects the actual emergency situation. 5. Ensure that information originating from the state accurately reflects the actual emergency situation.	• Serve as an interface between Xcel Energy and the states of Minnesota and Wisconsin. • Respond to state questions related to Xcel response activities.	Responsibilities aligned to actual performance responsibilities as demonstrated in drills and exercises.
43.	3.1.5 Emergency Planning County Liaisons	**Section B.1.a** County Liaison(s)	No Change. JIC Organization as defined in Section B-4 designates reporting chain to the Executive spokesperson.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
44.	The County Liaisons work with the State EP Liaison and assist that person by providing Liaison between NSPM/Xcel Energy and the County Agencies.	**Figure B-4, JIC Organization** **County Liaison(s)** • Provide assistance to County Emergency Operations Center (EOC) personnel. • Serve as an interface between County and Xcel Energy personnel. • Resolve rumors and validate site information regarding event status. • Coordinate response efforts with Sheriff's Offices. **Section C.3, p. 30** In addition to the coordination between the individuals in command and control of each organization, Xcel Energy personnel are dispatched to state or county EOCs as liaisons. The liaisons clarify information contained in emergency notifications and provide a communications link between the Xcel Energy and governmental emergency response facilities. When NRC representatives are present at the EOF and/or TSC, coordination occurs directly between NRC and Xcel Energy nuclear personnel.	Responsibilities aligned to actual performance responsibilities as demonstrated in drills and exercises.
45.	The County Liaison Representatives will have the following responsibilities: 1. Keep the State EP Liaison informed of issues brought up by County EOC staff and the media at County PIO briefings. 2. Provide assistance to the County EOC Operations Chief as requested. 3. Attend County press briefings as time permits. 4. Keep informed of activities in progress at the County EOC. 5. If requested by County EOC Operations Chief, contact State EP Liaison to resolve rumors and/or validate information concerning site status. 6. Assist Sheriff's Office representative in becoming aware of site shift change times, clearance of NSPM/Xcel Energy staff through roadblocks, or with other requests.		
46.	3.1.6 Security Advisor at the State Emergency Operations Center	**Section B.1.a** Security Advisor	
47.	The Security Advisor works with the Executive Spokesperson when security issues are concerns in the event. The individual assigned to fill this position will have the following responsibilities: 1. Provide the Executive Spokesperson with pertinent security information. 2. Act as NSPM/Xcel Energy's security liaison with the State of Minnesota.	**Figure B-4** **Section B.1.a** • Provide pertinent security information for security related events. • Serve as interface between Xcel Energy and State personnel.	Responsibilities aligned to actual performance responsibilities as demonstrated in drills and exercises. JIC Organization as defined in Section B-4 designates reporting chain to the Executive spokesperson.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
48.	**Section 4.0 Definitions**	**Section III: Appendices Appendix A**	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
49.	**4.1 Annually** Annually is defined as one calendar year (January – December).	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
50.	**4.2 Monthly** Monthly is defined as one month ± 1 week.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
51.	**4.3 Offsite Nuclear Emergency Plan** Provides supplementary direction and guidance for the NSPM/Xcel Energy Monticello and Prairie Island Emergency Response Organization including Site emergency plans and implementing procedures.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
52.	**4.4 Recovery Phase** The recovery phase should occur only after at least one fission product barrier is in place, the site is not making any radioactive releases to the environs greater than technical specification limits, and the site is stable, with very little potential for future degradation.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
53.	**4.5 Plant Management** The affected site's Vice President and their direct reports.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
54.	**4.6 Corporate Management** Those members of NSPM/Xcel Energy management below the Vice President level.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
55.	**4.7 Executive Management** Those members of NSPM/Xcel Energy management at the Vice President level and above.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
56.	**4.8 Corporate NSPM/XCEL ENERGY Offices** The administrative offices of NSPM/Xcel Energy located in Marquette Plaza, Minneapolis, Minnesota.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
57.	**4.9 Nuclear Emergency Preparedness Group** The NSPM/Xcel Energy group that is responsible for overall emergency preparedness including the interfacing with the governmental entities involved in emergency planning. Other NSPM/ Xcel Energy departments have emergency preparedness responsibilities as specified by this Plan or its Implementing Procedures.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
58.	**4.10 Communications Department** Xcel Energy communications staff are responsible for providing public information.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.
59.	**4.11 Offsite Officials** Those elected or appointed officials responsible for Federal (e.g., NRC, FEMA), State, and local government functions.	No equivalent statement	Definitions supporting the Standard Emergency Plan are Provided as separate Appendix. Other terms are defined as used in the Plan.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
60.	**4.12 Emergency Director** The affected site's Plant Manager or his designee. This individual has responsibility for managing the onsite emergency organization and initial efforts external to the site until the near site EOF Emergency Response Organization is activated and the Emergency Manager assumes control.	**Section B.1.a** <u>Main Control Room (MCR)</u> Shift Manager/Emergency Director (SM/ED) • Provide overall ERO command and control until relieved. • Evaluate plant conditions and approve Emergency Action Level (EAL) classifications until relieved. • Approve Protective Action Recommendations (PARs) until relieved. • Authorize personnel dose extensions until relieved. • Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs until relieved. • Direct radiation protection activities, including Field Monitoring Team (FMT) direction until relieved. • Direct and approve notifications to state and county authorities until relieved <u>Technical Support Center (TSC)</u> Emergency Director • Approve EAL classifications • Approve notifications to state/local agencies • Approve Protective Action Recommendations (PARs) • Approve Personnel dose extensions • Approve issuance of KI	Specific ERO Position defined for responsibilities within the Standard Plan. The Emergency Director role is initially assumed by the Shift Manager until transitioned to the TSC ED as defined in the Standard Plan. Enclosure 1 Section B provides the detailed functional analysis for ERO staffing.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
61.	**4.13 Emergency Manager** The Emergency Manager has the authority and responsibility for the Management of NSPM/Xcel Energy response to an emergency. This individual will assume control at the Emergency Operations Facility (EOF) or Backup EOF and direct the NSPM/Xcel Energy response efforts.	**Section C.2.a** The individual authorized to request assistance and resources from responding organizations is the Emergency Manager who has overall authority for the Xcel Energy nuclear response. **Section A.1.c** The Emergency Manager in the EOF is responsible for overall event response upon activation of that facility.	Standard Plan defines the position within the EOF organization. Enclosure 1 Section B provides the detailed functional analysis for ERO staffing.
62.	**4.14 Recovery Manager** This person is responsible for the implementation of the Recovery Phase. This individual will perform tasks as directed by the Emergency Manager but will primarily be responsible for establishing the Recovery Organization and preparing for the long-term recovery effort.	**Section M.2** Recovery Manager • Overall management of recovery activities. • Interface with federal, state and county agencies during the recovery process	Standard Plan defines Recovery as a specific organization once criteria are met to enter recovery phase. Responsibility is not impacted by the Standard Plan.
63.	**4.15 Advisory / Technical Support Group** This group is made up of selected personnel. They will provide a pool of personnel who are familiar with NSPM/Xcel Energy's Monticello or Prairie Island facilities, Off-site procedures, and available resources.	**Figures B-1, B-2 and B-3**	Standard Plan figures define the functional Emergency Response Facility support organization.
64.	**4.16 Sister Site** The sister site is the unaffected NSPM/Xcel Energy nuclear site. The sister site to Monticello is Prairie Island, and the sister site to Prairie Island is Monticello.	No equivalent statement	Incorporation of the Standard Plan concept integrates the Emergency Plans of Monticello and Prairie Island eliminating the need for the Sister Site concept.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
65.	**4.17 Near-Site Emergency Operations Facility (EOF)** Once activated, the Near-site Emergency Operations Facility will serve as the affected Plant's base for control of offsite emergency response activities.	No near-site EOF is proposed in the Standard Plan.	The Standard Plan eliminates the Near-Site EOF for a consolidated EOF concept with a near site response facility for NRC Site Team. The consolidated EOF will be a remote facility located greater than 25 miles from either site. See Enclosure 4 for detailed justification of the concept.
66.	**4.18 Technical Support Center (TSC)** The onsite Technical Support Center provides a central area outside of the control room that functions as a command and control center for the coordinated onsite emergency response during emergency conditions.	**Section H.1** The TSC provides a location to house personnel who are responsible for management and technical support of plant operations during emergency conditions. The TSC also functions to relieve the on-shift personnel of peripheral duties and communications not directly related to reactor system manipulations and preventing congestion in the MCR.	No change in intent of the ERF. Language modified to align with NUREG-0654, Revision 2, updated terminology.
67.	**4.19 Operational Support Center (OSC)** The Operational Support Center will provide a center to assemble the necessary Operators, Radiation Protection Specialists, Instrument Control, Electrical, and Maintenance personnel to support the operations of the site under emergency condition without causing undue congestion in the Control Room.	**Section H.2** The OSC provides a location where plant maintenance, operations, radiation protection and other plant emergency support personnel will assemble and stand by to assist as needed.	No change in intent of the ERF. Language modified to align with NUREG-0654, Revision 2, updated terminology.
68.	**4.20 State Emergency Operations Centers (SEOC)** These are the command and control centers for the State(s) of Minnesota and Wisconsin. Situation, evaluations and coordinated protective action recommendations will be maintained between county EOCs, the state EOCs, and the site EOF.	No equivalent section	Section A of the Standard Plan provides the general description including State and County response. Facilities used are controlled by their respective Plans/Procedures and not germane to the Standard Plan.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
69.	**4.21 County Emergency Operations Centers (local EOCs)** These response centers provide command and control functions and are the central point of coordination for county and local emergency response organizations.	No equivalent section	Section A of the Standard Plan provides the general description including State and County response. Facilities used are controlled by their respective Plans/Procedures and not germane to the Standard Plan.
70.	**4.22 Monticello and Prairie Island's Off-Site EMERGENCY RESPONSE Organization**. Those individuals assigned duties and responsibilities located at the JIC, and County and State EOCs. This Organization is comprised of various NSPM/Xcel Energy personnel.	**Figure B-4**	The Standard Plan incorporates the offsite ERO into the SEP ERO with the same expectations as onsite personnel with respect to training and qualification. Figure B-4 now describes what was previously the Off-Site ERO.
71.	**4.23 Joint Information Center (JIC)** A facility where designated spokespersons from federal, state, local, tribal and NSPM/Xcel Energy personnel will issue media releases.	**Section G.2** The State of Minnesota maintains a combined JIC/EOC for use by Xcel Energy and the State of Wisconsin. The JIC/EOC has sufficient space to allow interaction with the media. The JIC is staffed at an Alert or higher classification by Xcel Energy Corporate Communications personnel to ensure coordination with affected agencies and provide public information to the media and the public. The JIC provides the necessary structure and mechanism for organizing, developing, integrating, and delivering coordinated interagency messages via established plans, procedures, and strategies.	No change in intent of the JIC or performance by responders was made by the standard plan. An expanded description was provided to better reflect the process used.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
72.	**4.24 Emergency Response Organization Notification Systems (ERONS)** An automated notification system that is used for ERO activation and augmentation. This system is initiated by the sites for a declared emergency and utilizes a variety of communication methods to contact the ERO.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a. Alternate methods of ERO notification are in place via individual callouts of personnel utilizing any of the various calling methods available.	The Standard Plan adopts a single methodology for the notification of all ERO members including those formally activated through the Corporate Plan.
73.	**Section 5.0 Requirements**		
74.	5.1 Concept of Operations		
75.	The emergency plans for the Monticello and Prairie Island fixed nuclear facilities are designed to be implemented independently of offsite support. However, it is the purpose of the Monticello and Prairie Island Offsite Nuclear Emergency Plan to augment the Onsite Emergency Response Organization with additional resources as soon as possible.	No equivalent statement	This Offsite Plan is being subsumed into the SEP – therefore there are no current references to the “Offsite Emergency Plan” in the SEP.
76.	The Monticello and Prairie Island Offsite Nuclear Emergency Plan is designed to be implemented in an incremental manner, as site needs dictate.	No equivalent statement	This Offsite Plan is being subsumed into the SEP – therefore there are no current references to the “Offsite Emergency Plan” in the SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
77.	For emergency conditions that are classified as Unusual Events, the response will be limited to supplying offsite assistance in the areas of public information (Xcel Energy's Communications Department) and liaison to state and local officials. During an "Alert", "Site Area Emergency", or "General Emergency" NSPM/Xcel Energy Monticello and Prairie Island Offsite Emergency Response Organization will be activated.	**Section G.2** Corporate Communications personnel may provide public information at the Unusual Event declaration using social media in accordance with Joint Information System (JIS) precepts. Interactions with the media may occur at various locations and with various agencies depending on the extent of the response.	The language was updated to reflect current company terminology. There is no change in intent or actual practice from the current Plan.
78.	This activation will be accomplished through use of the automated Emergency Response Organization Notification System (ERONS) which is initiated by the site.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a. Alternate methods of ERO notification are in place via individual callouts of personnel utilizing any of the various calling methods available.	The Standard Plan adopts a single methodology for the notification of all ERO members including those formally activated through the Corporate Plan.
79.	The individuals assigned to the Offsite Emergency Response Organization as well as their duties and responsibilities are identified in the Monticello and Prairie Island Offsite Nuclear Emergency Plan Implementing Procedures.	No equivalent statement	This Offsite Plan is being subsumed into the SEP – therefore there are no current references to the "Offsite Emergency Plan" in the SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
80.	The Monticello and Prairie Island Offsite Nuclear Emergency Plan coordinates the resources of several utility, NSPM/Xcel Energy departments and various outside agencies. These organizations have each developed emergency planning documents to support their respective functions in the event of a nuclear incident at Monticello or Prairie Island nuclear sites.	No equivalent statement	This Offsite Plan is being subsumed into the SEP – therefore there are no current references to the “Offsite Emergency Plan” in the SEP.
81.	The Monticello and Prairie Island Offsite Nuclear Emergency Plan is implemented depending on the severity and location of the incident, in conjunction with one or more of the following emergency plans: 1. Monticello Nuclear Generating Plant Emergency Plan. 2. Prairie Island Nuclear Generating Plant Emergency Plan. 3. State of Wisconsin Emergency Operations Plan (applicable for PI Site only)	No equivalent statement	This Offsite Plan is being subsumed into the SEP – therefore there are no current references to the “Offsite Emergency Plan” in the SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
82.	4. Pierce County Emergency Operations Plan (applicable for PI Site only). 5. State of Minnesota Emergency Operations Plan. 6. State of Minnesota Local Government Emergency Response Plans for Nuclear Generating Plants. • City of Red Wing/Goodhue County Emergency Response Plan for the Prairie Island Nuclear Generating Plant. • Dakota County Emergency Response Plan for an Incident at the Prairie Island Nuclear Generating Plant. • Wright County Emergency Response Plan for the Monticello Nuclear Generating Plant. • Sherburne County Emergency Response Plan for the Monticello Nuclear Generating Plant. 7. Prairie Island Indian Community (applicable for PI Site only).	No equivalent statement	This Offsite Plan is being subsumed into the SEP – therefore there are no current references to the “Offsite Emergency Plan” in the SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
83.	Additionally, "Letters of Agreement" have been obtained from various other offsite agencies and corporations. These letters specify pre-existing arrangements to support NSPM/Xcel Energy or state and local government actions during an emergency condition. A list of these letters is provided in Attachment 5 of this Plan.	**Section C.2** Memorandums of Understanding (MOUs) and/or LOAs have been developed between Xcel Energy and several entities to provide emergency response support and services consistent with this plan. MOUs and LOAs are referenced by organization and title in element A.4 of the site-specific annexes. A contract/purchase order with a private contractor is considered acceptable in lieu of a MOU or LOA for the specified duration of the contract. LOAs common to both sites include; • Institute of Nuclear Power Operations (INPO) • State of Minnesota, Department of Public Safety Division of Homeland Security and Emergency • Regions Hospital • Environmental Inc, Midwest Laboratory • Department of Energy – REAC/TS • North Memorial Health Care • Pooled Equipment Inventory Co (PEICo)	The SEP updates language. There is no change in intent. There is no change in the proposed Plan for organizations in which an MOU/LOA was maintained. Site Specific information is contained in the applicable Change Justification Matrix.
84.	5.2 Emergency Classification System	**Section D, p. 33**	
85.	At the Monticello and Prairie Island Nuclear Generating facilities, emergencies are classified into one of four categories. Each succeeding category increases in level of severity and requires an increased amount of participation by onsite and offsite personnel.	**Section D.1** Xcel Energy has established and maintains a standard emergency classification and emergency action level scheme. The four ECLs are described as follows:	The SEP updates language. There is no change in intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
86.	For each emergency category, key personnel within NSPM/Xcel, Federal, State, Tribal and local organizations will be notified. They will, in turn, activate their respective emergency organizations according to their individual plans based on the conditions of the emergency.	**Section E.1** Xcel Energy, in coordination with state and county authorities, has developed methods and procedures for notification of offsite response organizations consistent with the emergency classification and EAL scheme.	The SEP updates language. There is no change in intent.
87.	Each classification provides a known boundary concerning the severity of the emergency condition.	**Section D.1** Xcel Energy has established and maintains a standard emergency classification and emergency action level scheme. The four ECLs are described as follows:	The SEP updates language. There is no change in intent.
88.	All NSPM/Xcel, Federal, State and local organizations accept this classification system and recognize the bounds of severity of the categories.	**Section D.1.b** The emergency classification and EAL scheme has been agreed upon by state and county governmental authorities that support Xcel Energy sites. Changes to the classification scheme or site-specific EALs are reviewed with the sites' respective state and county EPZ governmental authorities in advance of implementation.	The SEP updates language. There is no change in intent.
89.		**Section D.2** Xcel Energy has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded. The 15-minute time requirement to declare events will not be construed as a grace period to attempt to restore conditions to avoid declarations.	This section was previously in Site E Plans. The change reflects wording contained in the November 2011 Enhanced EP Rulemaking.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
90.	Associated with this classification system are recommended guidelines for protective actions to be implemented by State and local offsite authorities.	**Section E.3** In conjunction with state and county authorities, Xcel Energy nuclear sites have established the content of the initial notification message to be used during an emergency. Initial notification will include the following: • Site Name • ECL • Release status • PAR, if applicable The content of the follow-up messages is detailed in procedures.	Formatting of NUREG-0654, Revision 2, provides direction for PARs in Notification Section (E) vice Classification Section (D). The SEP contains criteria to provide a Protective Action Recommendation for any General Emergency Classification.
91.	Various events could initially be classified in one category and later be reclassified, as better defined and more complete information becomes available. The emergency classification system is constructed to provide a smooth transition between categories.	**Section D.1.a** EALs at Xcel Energy nuclear sites have been developed in accordance with NEI 99-01, Revision 6, Development of Emergency Action Levels for Non-Passive Reactors. This guidance has been approved by the NRC and is applicable to the reactor design at Xcel Energy nuclear sites.	The language has been reflected to address the use of the NEI 99-01 EAL scheme.
92.	The mechanism to classify any single event or group of events or conditions into one of the above categories is contained in the respective Site Emergency Plan Implementing Procedures.	**Section D.3** Xcel Energy maintains procedures that include immediate actions to be taken that are consistent with any declared EAL.	The language has been updated to reflect usage of the NEI 99-01 EALs. There is no change in intent.
93.	In general, the individual who is functioning as the Emergency Director is responsible to classify all emergency conditions.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Evaluate plant conditions and approve Emergency Action Level (EAL) classifications until relieved. <u>Technical Support Center (TSC)</u> Emergency Director (ED) • Approve EAL classifications	The SEP provides key responsibilities in bullet form. There is no change in the responsibility of the ED for Classification.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
94.	In certain situations, it is possible that the offsite organization may have data which would confirm an emergency classification or precipitate a reclassification. In order to preclude erroneous reclassification, after the EOF Emergency Response Organization is fully activated and has assumed responsibility for offsite activities, all changes in classification must have the concurrence of the Emergency Manager.	No equivalent statement	The SEP integrates offsite organization and the onsite into a single ERO making the statement not applicable under proposed change – See Table in B.2.a, page 20.
95.	Monticello and Prairie Island Nuclear Generating Plant Emergency Plan Implementing Procedures contain specific parameter values and equipment status for each emergency class as a convenient cross reference.	**Site-Specific Emergency Action level (EAL) and Technical Basis Document (EP-PLAN-04, EP-PLAN-05)**	The SEP incorporates each site's EALs and respective technical bases into stand-alone documents. These documents were previously approved by the NRC by separate SER.
96.	5.2.1 Classification System		
97.	Emergency situations are classified according to severity, taking into consideration potential as well as actual events in process.	**Section D.1.a** EALs at Xcel Energy nuclear sites have been developed in accordance with NEI 99-01, Revision 6, Development of Emergency Action Levels for Non-Passive Reactors. This guidance has been approved by the NRC and is applicable to the reactor design at Xcel Energy nuclear sites.	Language updated to reflect specific approval of NEI 99-01, Revision 6 EALs at both Xcel sites by previous submittal.

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98.	The four classifications are as follows: 1. Notification of Unusual Event (Unusual Event) 2. Alert	**Section D.1** The four ECLs are described as follows: <u>Unusual Event (UE)</u> Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs. <u>Alert</u> Events are in progress, or have occurred, which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life-threatening risk to site personnel or damage to site equipment because of hostile action. Any releases are expected to be small fractions of the EPA Protective Action Guideline exposure levels.	The SEP provides a formatting Change to Reflect current definitions of the four EAL Classification Levels with the listing rather than located elsewhere in the Plan.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
99.	3. Site Area Emergency 4. General Emergency	Site Area Emergency (SAE) Events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or hostile action that results in intentional damage or malicious acts; 1) toward site personnel or equipment that could lead to the likely failure of or; 2) that prevent effective access to, equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA PAG exposure levels beyond the site boundary. General Emergency (GE) Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or hostile actions that result in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA PAG exposure levels offsite for more than the immediate site area.	The SEP provides a formatting Change to Reflect current definitions of the four EAL Classification Levels with the listing rather than located elsewhere in the Plan.
100.	Methodologies for Classification of Emergencies are found in the Site Emergency Plans.	**Background** **Site-Specific Emergency Action level (EAL) Technical Basis Document (EPLAN-04, -EPLAN-05)**	The EAL Schemes and associated bases documents are now provided as stand-alone plan documents. The system is based on NEI 99-01, Revision 6 which was submitted and approved by a previous LAR.
101.	5.3 Facilities and Equipment	**Section H, p. 45**	
102.	5.3.1 Description of NSPM/Xcel Energy's Offsite Facilities		
103.		**Section C.1** The Xcel Energy EOF contains dedicated work areas and resources for federal personnel.	Statement added to clarify expectation to provide support for responding federal personnel.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
104.	1. Backup Emergency Operations Facility (BUEOF) This facility is approximately 1400 sq. ft. in area and is located in conjunction with Xcel Energy's general offices in Minneapolis. The primary purpose of this facility is to serve as the Backup EOF in the event that the near site EOF becomes uninhabitable, or security issues exist.	No equivalent statement	The SEP proposes a consolidated EOF located in downtown Minneapolis, formerly the Backup EOF, in place of near-site EOFs and the current approved BUEOF. Enclosure 4 provides the detailed justification for NRC approval of a consolidated EOF beyond 25 miles from the respective sites.
105.	2. Near-site Emergency Operations Facility (EOF) The Emergency Operations Facility is activated during "Alert", "Site Area Emergency" and "General Emergency" conditions. The purpose of the EOF is to provide a command and control center for the utilities offsite emergency activities concerned with identifying and limiting the consequences of the emergency conditions.	No equivalent statement	The SEP proposes a consolidated EOF located in downtown Minneapolis, formerly the Backup EOF, in place of near-site EOFs and the current approved BUEOF. Enclosure 4 provides the detailed justification for NRC approval of a consolidated EOF beyond 25 miles from the respective sites.
106.	The EOF is located in the Plant Training Center which also contains administrative offices for the Training Department and the plant simulator. For Monticello, the EOF is located approximately 1 mile south-southeast of the plant within the city of Monticello. For Prairie Island, the EOF is located approximately 1/2 mile west of the plant.	No equivalent statement	The SEP proposes a consolidated EOF located in downtown Minneapolis, formerly the Backup EOF, in place of near-site EOFs and the current approved BUEOF. Enclosure 4 provides the detailed justification for NRC approval of a consolidated EOF beyond 25 miles from the respective sites.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
107.	A more detailed description of the EOF facilities are contained in the Monticello and Prairie Island Nuclear Generating Plant Emergency Plans.	No equivalent statement	The SEP proposes a consolidated EOF located in downtown Minneapolis, formerly the Backup EOF, in place of near-site EOFs and the current approved BUEOF. Enclosure 4 provides the detailed justification for NRC approval of a consolidated EOF beyond 25 miles from the respective sites.
108.		**Section H.3** The EOF is a dedicated facility located in conjunction with Xcel Energy's general offices in Minneapolis and serves as the EOF for Xcel Energy nuclear sites. Access to the EOF is controlled using electronic card readers. The EOF is required to be activated within 90 minutes following the declaration of an Alert or higher classification. The EOF has the capability to display vital plant data and radiological information for each site and unit, in near real time, to be used by knowledgeable individuals responsible for providing technical briefings on plant conditions, event prognosis, and for management of overall emergency response. The EOF provides reliable voice communications to each site's MCR, TSC, OSC, the NRC, and state and county warning points and EOCs.	Section provides updated description for proposed consolidated EOF. Enclosure 4 provides the detailed justification for NRC approval of a consolidated EOF beyond 25 miles from the respective sites.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
109.		**Section H.3.a** The EOF is greater than 25 miles from MNGP and PINGP. Xcel Energy maintains space for members of an NRC Site Team and federal responders at a location near those sites. The location and provisions of the near-site facilities is described in the site-specific annexes.	The SEP proposes a consolidated EOF located in downtown Minneapolis, formerly the Backup EOF, in place of near-site EOFs and the current approved BUEOF. Section was added to document NRC requirement to provide near-site space for federal responders if the primary EOF is located greater than 25 miles from the site(s). Enclosure 4 provides the detailed justification for NRC approval of a consolidated EOF beyond 25 miles from the respective sites.
110.	5.3.2 On-Site Emergency Centers		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
111.	There are two emergency centers at each plant, the onsite Technical Support Center	**Section H.1** Each Xcel Energy nuclear site has a dedicated TSC for use during emergency situations to implement emergency actions and analyze and mitigate accident conditions. The TSCs are sized to accommodate ERO responders and NRC representatives. State and county personnel are not expected to report to the TSC. The TSC is activated within 60 minutes following the declaration of an Alert or higher classification. TSC activation at the Unusual Event emergency classification level is optional. Site-specific details of the TSC are described in the site-specific annexes. **Monticello Annex, Section H.1** The Technical Support Center (TSC) is located on the first level of the Plant Engineering Building (PEB). **Prairie Island Annex, Section H.1** The Technical Support Center (TSC) is located across the Turbine Building from Units 1 & 2 Control Room.	Expanded description of the TSC and the OSC (see line 111) below to align with formatting per NUREG-0654, Revision 2. Activation times are specified. The SEP provides no change to the existing TSC or OSC.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
112.	…and the onsite Operational Support Center.	**Section H.2** Each Xcel Energy nuclear site has an OSC that provides an area for coordinating and planning event response activities and for staging personnel and equipment. The OSC is activated within 60 minutes following the declaration of an Alert or higher classification. OSC activation at the Unusual Event emergency classification level is optional. Site-specific details of the OSC are described in the site-specific annexes. **Monticello Annex, Section H.2** The Operational Support Center (OSC) is located in designated areas on the first and second levels of the Plant Administration Building and is provided with the necessary equipment and communication links to support OSC emergency response actions. **Prairie island Annex, Section H.2** The Operational Support Center (OSC) is located in the New Administration Building and is provided with the necessary equipment and communications links to support OSC emergency response actions	Expanded description of the TSC and the OSC below to align with formatting per NUREG-0654, Revision 2. Activation times are specified. The SEP provides no change to the existing TSC or OSC.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
113.	Alternative Response Facilities have been designated when ERO response to the onsite centers is not appropriate due to the nature of the site event.	**Section H.4** An Alternative Emergency Facility for staging of ERO personnel has been designated for each Xcel Energy nuclear site and serves as a location for TSC and OSC personnel should those facilities become uninhabitable or in the cases where the facilities cannot be accessed such as a hostile action or natural disaster. The location of the Alternative Emergency Facility for each site is provided in the site-specific annexes.	Language has been updated in the SEP to maintain the commitment for Alternative Response Facilities consistent with the November 2011 Enhanced EP Rulemaking and direct the reviewer to the Site Annex for the site-specific facility information.
114.	Detailed descriptions of these centers are included in the specific site plans.	**Monticello Annex, Section H.4** The MNGP Training Building has been designated as the MNGP alternative facility. **Prairie island Annex, Section H.4** The Red Wing Service Center (RWSC) has been designated as the Alternative Facility.	Language has been updated in the SEP to maintain the commitment for Alternative Response Facilities consistent with the November 2011 Enhanced EP Rulemaking and direct the reviewer to the Site Annex for the site-specific facility information.
115.	5.3.3 Governmental Facilities		
116.	1. Minnesota State Emergency Operations Center (EOC) The State EOC is the command and control center for the state. Coordination will be maintained between County EOCs and the State EOC for situation evaluation and protective actions. Federal agencies assigned responsibilities in the event of a nuclear power plant accident, regardless of location, will maintain coordination with the State EOC	**Section A.1.a** The Minnesota (MN) Department of Public Safety has the responsibility for notification and coordination MN of state agencies in the event of a major emergency at Monticello and Prairie Island. When the State Emergency Operations Center (SEOC) is activated, communications between departments are initiated in order to coordinate procedure implementation. The state agencies responsible for implementing procedures have established a system of 24-hour communications.	Language updated to reflect current State/County Emergency Plan language. There is no change in intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
117.	State agencies assigned responsibilities for emergency functions will provide required personnel at the State EOC. In most instances, when the state EOC is activated a licensee Executive Spokesperson will be in attendance. The Executive Spokesperson will have an office at the EOC equipped with communication channels (voice & telecopy) to interface with key licensee facilities including the EOF.	No equivalent statement	The description is no longer applicable to licensee Emergency Plans per NUREG-0654, Revision 2.
118.	2. Wisconsin State Emergency Operations Center (EOC) For emergencies at Prairie Island, the Wisconsin EOC in Madison will be activated and will serve as a command and control center for Wisconsin response activities. The Wisconsin EOC in Madison will coordinate communications with the Pierce County (Wisconsin) EOC in Ellsworth and the Joint Information Center (JIC) in St. Paul, Minnesota.	No equivalent statement	The description is no longer applicable to licensee Emergency Plans per NUREG-0654, Revision 2.
119.	3. County Emergency Operations Centers (EOC) The county EOCs are command and control centers for the local emergency response organizations. They are located in the following buildings:	**Section A.1.a** Counties within the sites' plume exposure EPZ maintain emergency plans that address the following primary response aspects: • Notification of their own personnel and other agencies such as, local law enforcement, fire and rescue, and Red Cross. • Traffic control • Notification or warning of persons in affected areas.	Language of the SEP has been updated to more clearly state responsibilities of the offsite counties. Specifics to the EOCs are deleted due to the facility description being maintained in the offsite approved plans. The list of impacted counties is maintained unchanged.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
120.	• Goodhue County Law Enforcement Building. • Dakota County Government Center. • Pierce County Emergency Management Office in the Ellsworth Courthouse Annex. • Wright County Courthouse. • Sherburne County Government Building.	**Section A.1.a (continued)** • Evacuation out of the affected area, and provisions for shelter, food, accommodations, communications, medical care, etc. • Provide support to other counties, Xcel Energy, state and federal agencies. Select counties adjacent to the sites' plume exposure EPZ maintain emergency plans to provide assistance and logistics support if evacuation of portions of the ten-mile EPZ becomes necessary. Plume exposure and ingestion pathway EPZ counties are listed in the site-specific annexes. Emergency Planning Zone (EPZ) Counties The Emergency Management Agencies representing the Minnesota counties of Sherburne, Wright, Dakota, and Goodhue and the Wisconsin County of Pierce have the responsibility for notification and providing direction to residents in the event of an emergency that affects their respective jurisdiction.	Language of the SEP has been updated to more clearly state responsibilities of the offsite counties. Specifics to the EOCs are deleted due to the facility description being maintained in the offsite approved plans. The list of impacted counties is maintained unchanged.
121.	The County EOC receives primary direction from the State EOC and coordinates the local emergency response activities. The agencies assigned responsibilities in the county emergency response organization will provide the required personnel to the county EOCs.	**Section A.1.a, (continued)** The 24-hour notification points have the responsibility to notify necessary local civil support groups in the event of an accident. The County is responsible for protection of the public and can provide personnel and equipment for evacuation, relocation, and isolation.	The description is no longer applicable to licensee Emergency Plans per NUREG-0654, Revision 2.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
122.	4. Joint Information Center (JIC) The State of Minnesota has established a JIC, which will be activated jointly with the State EOC. The JIC is located in the Saint Paul Minneapolis area and the major Minnesota news media are also headquartered in this area. The State of Wisconsin officials are aware of this arrangement and are prepared to send representatives.	**Section G.2** The State of Minnesota maintains a combined JIC/EOC for use by Xcel Energy and the State of Wisconsin. The JIC/EOC has sufficient space to allow interaction with the media. The JIC is staffed at an Alert or higher classification by Xcel Energy Corporate Communications personnel to ensure coordination with affected agencies and provide public information to the media and the public. The JIC provides the necessary structure and mechanism for organizing, developing, integrating, and delivering coordinated interagency messages via established plans, procedures, and strategies.	The SEP provides updated language more specific to the JIC organization and function. There is no change proposed to the facility or current functionality as demonstrated in drills/exercises.
123.	5.3.4 Communication Links	**Section F – Emergency Communications**	
124.	The equipment in each site Emergency Response Facility is specified in their Emergency Plans. The equipment in the Backup EOF is described in Attachment 2.	**Section F Emergency Communications** **PI Annex Table F.1.b PINGP Communications Matrix** **Monticello Annex Table F.1.b MNGP Communications Matrix**	The SEP provides standardized Section F provides description of the communications systems available to the entire organization. The site-specific tables provide an integrated listing of what's available to the site. Methods and interfaces are described in Enclosures 2 and 3 Attachment 5 to this submittal to clarify site communication capabilities and interfaces. No change in actual communications capability is proposed in the SEP.
125.	5.4 Emergency Response		
126.	Emergency response activities performed through the Monticello and Prairie Island Offsite Emergency Response Organization are predicated on the fact that each site is able to operate independently for several hours during an emergency.	No equivalent statement	Incorporation of a consolidated SEP eliminates the need for ongoing independent operation.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
127.	Since the Offsite Emergency Response Organization can be activated within approximately 2 hours, adequate support is available, should the site require it.	No equivalent statement Figures B-3 EOF and B-4 JIC document the staffing timeliness requirements for key personnel.	Incorporation of a consolidated SEP eliminates the need for ongoing independent operation. Activation timing for the EOF/JIC is now formalized in the SEP at 60/90 minutes for the EOF and 90 minutes for the JIC.
128.	5.4.1 Activation		
129.	Activation/Site The Shift Manager/Emergency Director is responsible for activating the site Emergency Response Organization in accordance with site Emergency Plan Implementing Procedures. A detailed description of the site activation process is contained in the applicable Site Emergency Plan.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	A single methodology for activation of the ERO responding to a specific event was adopted covering both site and previous corporate organizations.
130.	Activation/Offsite The NSPM/Xcel Energy Monticello and Prairie Island Offsite Emergency Response Organization can be activated within about 2 hours of notification. The Site Plan Implementing Procedures provide for the notification of the Offsite Emergency Response Organization (ERO). The automated Emergency Response Organization Notification System (ERONS) will notify the Offsite ERO in the event of a declared emergency in accordance with the Offsite Emergency Plan Implementing Procedure.	No equivalent statement	The incorporation of the consolidated EOF into the SEP provides for 60/90 minute staffing and activation. Similarly, the SEP provides for 90-minute staffing of the JIC.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
131.	5.4.2 Planned Response Action	**Section A.1** A description of the Xcel Energy Emergency Response Organization (ERO) is detailed in Section B. The subsections below identify the Offsite Response Organizations (OROs), federal, state, tribal, county and other organizations that encompass the overall response organization for an event at an Xcel Energy plant site.	SEP added the introductory paragraph to enhance readability of the section.
132.	1. Response/Site The Site Emergency Response Organization is activated immediately after the Shift Manager declares an emergency condition as described in site plans. At this declaration, the Shift Manager becomes the Emergency Director until he is formally relieved of that responsibility according to the site Emergency Plan Implementing Procedures.	**Section D.3, Table D.3-1** **Section B.2** The SM/ED is the on-shift individual who has the authority and responsibility to immediately and unilaterally initiate any emergency actions, including providing PARs to authorities responsible for implementing offsite emergency measures.	The SEP updates language without changing practice or intent.
133.	As Emergency Director, several emergency response actions are pre planned in the site plan and procedures. These actions include steps that initiate the activation process for the site Emergency Response Organization.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	A single methodology for activation of the ERO responding to a specific event was adopted covering both site and previous corporate organizations.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
134.	2. Response/ Monticello and Prairie Island Offsite The Xcel Energy Security Operations Center (SOC) is continuously manned at Xcel Energy's General Office. When notified of an emergency condition, the SOC will initiate a Mission Mode notification to establish a management conference call. As part of the site's ERONS, offsite ERO are also notified who will respond to their assigned ERF and initiate Offsite Emergency Plan Implementing Procedures. The notified personnel have assigned duties that, when implemented, provide for an operational group of personnel at the JIC.	No equivalent statement	NUREG 0654, Revision 2, separates the functions controlled by other site plans from the Emergency Plan as defined by the EP functions. Security performance is controlled by the site Security Plan and therefore no longer addressed in the SEP.
135.	3. Response/Vendor/Consultant There are two primary vendors that are involved with emergency response planning for Monticello and Prairie Island Sites. They are: General Electric Co. (GE) for Monticello and Westinghouse (W) for Prairie Island.	**Section B.5** Major equipment providers or Architect-Engineers include Westinghouse Electric Corporation and General Electric Corporation, which can provide the following assistance in an emergency:	SEP language was consolidated without change in practice or intent.
136.	At the request of the Emergency Manager, these companies will provide assistance. The response actions which may be requested involve the following:		The site annexes contain the LOAs for the respective Vendors. There is no change to Westinghouse/GE support connected to the SEP proposal.
137.	• Personnel • Technical analysis • Operational analysis • Accident/transient analysis Other vendors or consultants will be requested to provide assistance as needed.	**Section B.5** • Trained personnel. • Technical analysis. • Operational analysis. • Accident and transient analysis.	The site annexes contain the LOAs for the respective Vendors. There is no change to Westinghouse/GE support connected to the SEP proposal.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
138.	4. Assistance from Other Utilities Under an emergency, it may be desirable to call on the resources (personnel and equipment) of other nuclear utilities, outside of NSPM/Xcel Energy. Such a request may be made by the sites using the INPO Emergency Resource Manual.	**Section C.2** LOAs common to both sites include; • Institute of Nuclear Power Operations (INPO)	The INPO agreement provides the industry cooperative support. SEP language was updated to align with current practice. There was no change in LOAs/MOUs maintained.
139.	5. Response/Support and Resources The Minnesota Department of Homeland Security and Emergency Management (HSEM) and the Wisconsin Emergency Management (WEM) are the state agencies which are responsible for the overall direction of the state emergency response efforts.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
140.	The HSEM and WEM will activate their Emergency Operation Centers and deploy their personnel and resources, in accordance with the State of Minnesota Emergency Operations Plan, and the Wisconsin Emergency Operations Plan respectively.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
141.	These plans include written messages intended for the public which are consistent with the emergency classification scheme and give the public instruction regarding suitable protective action.	**Section E.5** State and county procedures provide for initial and follow-up messages to the public including instructions for protective actions, if required. Xcel Energy assists with establishment of appropriate instructions and message content.	The SEP provides for general assignment of responsibility. Message content is provided by the respective OROs.
142.	The Public Emergency Planning Education Program (described in Section 5.5) will familiarize the public in the proper response to these pre-planned messages.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
143.	The Federal Department of Energy Radiological Assistance Program is available for monitoring assistance and radiological advice to the Minnesota Department of Health (MDH), Section of Radiation Control, and the Wisconsin Department of Health Services (DHS), section of Radiation Protection.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
144.	The Department of Energy (DOE) is the coordinating agency for the Federal Emergency Response Plan (FERP). Regional Coordinating offices are assigned geographic responsibilities for incidents in their region. Their objective is to rapidly dispatch specialists to the incident site, evaluate the hazard, take recommended action to counteract and control any acute hazard, and establish communications with local authorities and the press.	**Section A.1.a** <u>Department of Energy (DOE)/Radiation Emergency Assistance Center/Training Site (REAC/TS) Support</u> The DOE provides radiological assistance on request though the REAC/TS and has radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. Following a radiological incident, DOE operates as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP).	SEP provides updated language without changing practice or intent.
145.	The Regional Coordinating Offices will respond to requests for radiological assistance from the NSPM/Xcel Energy, federal, state, and local agencies, and would implement the FERP.		SEP provides updated language without changing practice or intent.
146.	The Emergency Manager will, if necessary, coordinate with the Health Department(s) any request for DOE assistance. Federal assistance teams will be supplied operating quarters, support, and resources by the State EOC(s).		The statement is no longer addressed in the SEP. Activation of DOE assistance is controlled by the FRMAP.
147.	5.5 Public Information		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
148.	Public Emergency Planning Education NSPM/Xcel Energy, in coordination with state, county and local officials, annually provides the general public (including transients) with information concerning the methods of public notification and what individual actions should be taken during an emergency.	**Section G.1** Xcel Energy, in coordination with state, county and local officials, annually provides the general public, including transients, with information concerning the methods of public notification and what individual actions should be taken during an emergency.	The SEP provides updated language without changing requirement, practice or intent.
149.	This information may include: • methods of public notification • possible protective actions • general information as to the nature and effects of radiation • contact points for additional information • special needs for the handicapped • registration cards for the mobility impaired.	**Section G.1** This information may include: • methods of public notification • possible protective actions • general information as to the nature and effects of radiation • contact points for additional information • special needs for the handicapped • registration cards for the mobility impaired.	The SEP provides updated language without changing requirement, practice or intent.
150.	Methods for disseminating the information may include calendars, brochures, annual publications, public postings and/or meetings. Dissemination of information to the public is coordinated with state and local agencies.	**Section G.1** Methods for disseminating information may include brochures, annual publications, public postings, websites and/or meetings and lake access signs. Transient locations may include, but are not limited to, motels, hotels, marinas, and lake access areas. Dissemination of information to the public is coordinated with state and local agencies.	The SEP provides updated language without changing requirement, practice or intent.
151.	Media Information The Xcel Energy Communications Department has established a Nuclear Emergency Communications Plan. This program is designed to ensure prompt communications between Xcel Energy or NSPM and principal media organizations.	**Section G.5** The Xcel Energy Communications Department has communications procedures to ensure prompt communications between Xcel Energy and principal media organizations.	The SEP provides updated language without changing requirement, practice or intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
152.	At least once a year, both states will conduct training programs or send mailings to acquaint the news media with the emergency plans and to provide information concerning radiation and points of contact for release of public information in an emergency. NSPM/Xcel Energy has input to this process.	**Section G.5** At least once a year, both states will conduct training programs or send mailings to acquaint the news media with the emergency plans and to provide information concerning radiation and points of contact for release of public information in an emergency. Xcel Energy has input to this process.	No change
153.	NSPM/Xcel Energy have established procedures for informing the news media when a nuclear power plant is removed from service and the Nuclear Emergency Communications Plan delineates additional responsibilities during a serious nuclear accident.	No equivalent statement	Prior Plan statement was outside the controls of the Emergency Plan.
154.	Primary responsibility for implementation of the program rests with the Xcel Energy Communications Department after notification by the site.	No equivalent statement	Incorporation of the JIC into the SEP provides formal commitment as to the process and controls.
155.	Release of information to the news media and the scheduling of news conferences SHALL have the review and concurrence of the Executive Spokesperson.	No equivalent statement	The statement provides procedure level detail. The joint control of the JIC by site and offsite personnel provide controls for release of information.
156.	NSPM/Xcel Energy and Xcel Energy Employee Information It is desirable that NSPM/Xcel Energy employees be aware of the current status during an emergency. This ensures employees do not inadvertently start rumors.	No equivalent statement	The SEP addresses notification of personnel supporting implementation of the emergency plan and provides for protective actions for non-essential personnel onsite. Communications to uninvolved employees are beyond the scope of the plan and federal regulatory requirements and controlled at the procedural level.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
157.	Methods of employee communication are delineated in the Communications Program and may consist of the following: • Electronic mail • Public address announcements • Daily news services, print, and phone • Employee meetings	No equivalent statement	The SEP addresses notification of personnel supporting implementation of the emergency plan and provides for protective actions for non-essential personnel onsite. Communications to uninvolved employees are beyond the scope of the plan and federal regulatory requirements and controlled at the procedural level.
158.	5.6 Emergency Organization Interfaces		
159.	The purpose of this section is to specify communications interfaces between the Emergency Response Organization and various organizational entities within and outside of NSPM/Xcel Energy.	**Section B, Figure B.4-1** A block diagram showing the interfaces between the licensee and state, local, tribal government organizations is located in Figure B.4-1.	The block diagram outlining the interfaces was adopted as a recommendation of NUREG-0654, Revision 2. The SEP proposes no change to current practices.
160.	After notification of an emergency condition is made to offsite officials, the state, and applicable county emergency operations centers, the associated response teams will be activated, in accordance with the appropriate State Emergency Plans.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
161.	Designated NSPM/Xcel Energy personnel will make periodic status reports of site conditions to offsite officials.	**Section E.1.a** Follow-up messages are provided periodically to the appropriate offsite authorities. For long duration events with little change in information between messages, the follow-up message time interval can be increased as agreed upon by affected agencies. Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	The SEP provides updated language without any change to performance or intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
162.	Meteorological data, survey results, projected doses and protective action recommendations will be provided to offsite officials.	**Section I.6** Xcel Energy uses an industry recognized dose assessment code to make timely assessments of the actual or potential magnitude and locations of any radiological hazards through gaseous release pathways. Personnel qualified in dose assessment are available on-shift, in the TSC and the EOF. Dose assessment results and field monitoring readings assist in evaluating appropriate ECLs based on radiological EALs and developing any related PARs. The immediate onsite magnitude and consequences of liquid releases regarding event classification are primarily determined by liquid effluent monitors and direct area surveys. Post-plume protective actions are developed by OROs and described in state and county radiological emergency plans. Xcel Energy FMT and laboratory personnel may assist ORO decision making with sample collection and analysis using established procedures and protocols	SEP provides a more detailed description of the capability and intent to share related information with OROs. There is no proposed change in practice or intent.
163.	The final decision concerning what protective actions will be implemented on behalf of the public rests with the Governor of each State.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
164.	Designated Utility officials will make recommendations (see site plans) but the State of Minnesota (and/or Wisconsin & Prairie Island Indian Community) is responsible for issuing protective actions decisions (PADs). If necessary, for a fast developing incident, the States' Plan provides for the contingency that the site may recommend immediate protective actions to offsite officials.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
165.	5.7 Recovery Phase	**Section M**	
166.	The process of Recovery Phase is defined in the specific site plans.	**Section M.2 and Figure M.2-1** Figure M-2 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization.	The SEP consolidates the language related to Recovery from the existing corporate and site Plans. See the Site Plan Justification Matrices for detailed alignment of the Recovery process proposed in the SEP.
167.	5.8 Exercises, Drills and Training	**Section N**	
168.	Exercises Periodic exercises and drills are conducted to evaluate major portions of emergency response capabilities, maintain capabilities and identify deficiencies that form the basis for corrective action.	**Section N.1** An exercise tests the integrated capability and a major portion of the elements of the emergency plan and organizations. Over the period of the exercise cycle, exercises will 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. Drills are supervised instructional periods aimed at testing, developing and maintaining skills in a particular operation and are a part of the continuous training program and is often a component of an exercise. Drills and Exercises may be comprised of combinations of the criteria described below.	Language for the SEP was consolidated from the existing Site Emergency Plans and Corporate Emergency Plan. Resulting language is consistent with the 2011 Enhanced EP Rulemaking. Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
169.	These exercises serve to develop and maintain key skills in the course of emergency response.	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
170.	An exercise is a real time simulated event that tests the integrated capability of the ERO and a major portion of the five basic elements existing within emergency preparedness plans.	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
171.	The emergency preparedness exercise simulates an emergency that results in potential offsite radiological releases which would require response by offsite authorities.	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
172.	The five basic elements are: 1. Initial Response Activities • Identify and classify emergency • Notify and communicate conditions • Activate organizations and facilities • Control facility access	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
173.	2. Emergency Response Activities • Assess accidents • Mitigate accidents • Recommend protective actions	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
174.	3. Radiological Response Activities • Sample/analyze plant air/liquids • Monitor onsite radiological conditions • Control emergency radiation exposure • Monitor offsite radiological conditions	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
175.	4. Assembly and Accountability Activities	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
176.	5. Offsite Interface Activities	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
177.	The specifics of conducting Emergency Preparedness drills or exercises are found in Emergency Preparedness Drill and Exercise Manual.	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
178.	When integrated exercises are conducted, the scope will be expanded to also include appropriate State and local government agencies as well as the JIC.	No equivalent statement	Corporate Emergency Plan contained minimal information related to the drill and exercise program since it was primarily controlled by the Site Emergency Plans. See the site-specific Justification Matrices for detailed alignment of existing commitments, the 2011 Enhanced EP Rulemaking and the proposed SEP.
179.	Each site SHALL exercise with offsite authorities such that the State and local government emergency plans for each operating reactor site are exercised at least biennially, with full or partial participation by State(s) and local governments, within the plume exposure pathway EPZ.	**Section N.2, N.2.a** Each Xcel Energy nuclear site will conduct a Plume Exposure Pathway (PEP) Exercise biennially. This exercise includes mobilization of licensee state, local, and tribal government personnel, as applicable, and resources and implementation of emergency plans to demonstrate response capabilities. State, county and tribal authorities are invited to participate in PEP exercises. If a state, county or tribal organization chooses not to participate it will be documented that they were given the opportunity to participate. Exercise scenarios are submitted in accordance with 10 CFR 50, Appendix E, IV.F(2)b.	Language updated to reflect the 2011 Enhanced EP Rulemaking. The SEP provides to no change to practice or intent.
180.	The level of participation SHALL be as follows: • At a minimum, each State, within an Ingestion Pathway Zone (IPZ), SHALL exercise its plans and preparedness related to ingestion exposure pathway measures at least once every 8 years. The States of Minnesota and Wisconsin should rotate this participation from between Monticello and Prairie Island sites.	**Section N.2.b** Not applicable to the licensee	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.

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181.	Local governments having ingestion pathway responsibilities should also participate. At a minimum, local entities should, during the year the full participation ingestion exercise is held, review their plans and procedures to verify their accuracy and completeness.	**Section N.2.b** Not applicable to the licensee	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
182.	• The Utility should enable any State or local governments, located within the plume exposure pathway EPZ, to participate in annual full scale exercises when requested by such State or local government.	**Section N.2.a** State, county and tribal authorities are invited to participate in PEP exercises. If a state, county or tribal organization chooses not to participate it will be documented that they were given the opportunity to participate.	Language updated to reflect practice if ORO chooses not to participate. The SEP provides no change in practice or intent.
183.	The need for a remedial exercise under 10 CFR Part 50, Appendix E, Section IV.F.2.f will be determined on a case-by-case basis when any of the following conditions associated with a biennial exercise occurs: • Confidentiality is compromised to an extent that broadly affects ERO performance. • The scenario does not provide the opportunity for demonstration of key skills; the scenario is not implemented in such a way that provides the opportunity for demonstration of key skills. • ERO performance does not provide the NRC with a basis to determine that key skills have been maintained. • The extent of participation in a remedial exercise will also be determined on a case-by-case basis since only portions of the response may need to be re-demonstrated.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.

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184.	NSPM/Xcel Energy participants in drills and exercises SHALL be assigned from the staff listings in the Nuclear Emergency Preparedness Telephone Directory.	No equivalent statement	Language standardized between the three plans. Commitment remains to observe and critique drills and exercises. Obtaining controllers is a procedural level requirement.
185.	Controllers in drills and exercises should be trained in the Emergency Response Organization to which they are assigned duties.	No equivalent statement	Controller training will be addressed as part of the site EP Training Program.
186.	Official controllers from Federal, State or local governments will observe, evaluate, and critique the required exercises.	No equivalent statement	The statement is no longer required for the licensee Emergency Plan per NUREG-0654, Revision 2.
187.	A critique SHALL be scheduled at the conclusion of the exercise to evaluate each organization's ability to respond as called for in the Emergency Plan. The critique SHALL be conducted as soon as practicable after the exercise, and a formal evaluation should result from the critique.	**Section N.1.a** Following exercises and drills, a critique is conducted by qualified Xcel Energy individuals to evaluate areas and identify issues with ERO performance, response procedures, facility and equipment adequacy. The critique is performed as soon as possible following the conclusion of a drill or exercise using preselected drill and exercise performance objectives that are evaluated against measurable demonstration criteria. Provisions are made for federal, state, and county representatives to observe and participate in drill and exercise critiques. A critique report is prepared by the EP group following a drill or exercise documenting objective demonstration. Failed or degraded performance objectives are entered into the corrective action program (CAP).	SEP standardizes wording between the three plans and aligned to the wording of the November 2011 Enhanced EP Rulemaking.
188.	Controller and participant comments should be evaluated, and corrective actions will be established by management control to ensure that Emergency Plan or Implementing Procedures are changed as required.	**Section N.1.b** The Xcel Energy CAP process provides for tracking and trending of issues in accordance with 10 CFR 50 Appendix B, Criterion XVI.	SEP documents intent for EP to use the existing Corrective Action Process for issues related to ERO performance in drills and exercises. There is no change in the SEP from past practice.

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189.	The exercise will be varied from year to year so as to test all major components of the plans and preparedness organizations, which may include federal emergency response agencies, within the applicable exercise cycle (8 years).	**Section N.3** During each eight-year exercise cycle, scenario content will address the following elements.	SEP Sections N.3 and N.4 specify the specifics needed to address the requirement as directed in NUREG-0654, Revision 2.
190.	Provisions should be made to start a drill or exercise between 6:00pm and 4:00am at least once in every exercise cycle. Some drills or exercises should be unannounced.	**Section N.1.c** Each Xcel Energy nuclear site will conduct at least one drill or exercise between 6:00 pm and 4:00 am within an eight-year exercise cycle. This requirement may be satisfied by an actual event provided it meets the above criteria and the objectives are evaluated and documented in a critique report for the augmentation of the ERO.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
191.		**Section N.1.d** Each Xcel Energy nuclear site will conduct at least one unannounced drill or exercise within an eight-year cycle. This requirement may be satisfied by an actual event provided objectives are evaluated and documented in a critique report for the augmentation of the ERO.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
192.	The details concerning scheduling, conduct and critique of drills and exercises are specified in site specific procedures.	**See lines 188 through 201 for details**	Drill and Exercise Section has been revised to reflect the criteria and frequency derived from the 2011 Enhanced EP Rulemaking.
193.		**Section N.3, N.3.a** Each Xcel Energy nuclear site will conduct at least one HAB scenario in a drill or exercise within an eight-year cycle. The HAB scenario will include either a radiological release scenario or no/minimal radiological release scenario. HAB scenarios combined with a no/minimal radiological release scenario will not be used consecutively in exercises.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.

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194.		**Section N.3.b** Each Xcel Energy nuclear site will conduct at least one rapid escalation scenario in a drill or exercise within an eight-year cycle. The rapid escalation scenario will begin with an initial classification of or rapidly escalate to the Site Area Emergency or General Emergency level.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
195.		**Section N.3.c** Each Xcel Energy nuclear site will conduct at least one No/Minimal radiological release scenario that escalates to a Site Area Emergency but does not require escalation to the General Emergency classification level with PARs in a drill or exercise within an eight-year cycle.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
196.		**Section N.3.c.1** State and county agencies located within the plume exposure pathway EPZ are invited to participate in No/Minimal radiological release scenarios.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
197.		**Section N.3.c.2** When planning for a joint no/minimal radiological release exercise, affected parties will identify offsite capabilities that may still need to be evaluated.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
198.		**Section N.3.d** Each Xcel Energy nuclear site will conduct at least one scenario that integrates offsite resources with onsite response in an exercise within an eight-year cycle. Demonstration of resource integration includes briefings, offsite response to the site and coordination of worker protection, as appropriate to the scenario.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.

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199.		**Section N.3.e** Each Xcel Energy nuclear site will conduct at least one scenario in a drill or exercise within an eight-year cycle to demonstrate strategies and guidelines to maintain or restore core cooling, containment, or spent fuel pool cooling capabilities under the circumstances associated with the loss of large area due to explosions or fire. Strategies to be demonstrated may include one or more of the following: • Fire fighting • Operations to mitigate fuel damage • Actions to minimize radiological release	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
200.		**Section N.4, N.4.a** Each Xcel Energy nuclear site will conduct an emergency medical drill once per calendar year. The scope of the emergency medical drill will include a simulated contaminated individual and invitation for participation by support services agencies.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
201.		**Section N.4.d** Each Xcel Energy nuclear site will conduct an environmental monitoring drill once per calendar year. The scope of the environmental monitoring drill will include performance objectives for direct radiation measurements in the environment, collection and analysis of sample media including water, vegetation, soil, and air, provisions for communications and record keeping.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
202.		**Section N.4.g** Testing of Post-accident sampling systems are completed as a function of site Technical Specifications.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.

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203.		**Section N.4.h** Each Xcel Energy nuclear site will conduct an off-hours unannounced ERO report-in augmentation drill biennially. The EOF will participate concurrent with either of the Xcel Energy nuclear sites.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
204.		**Section N.4.i** Each Xcel Energy nuclear site and the EOF will conduct an off-hours call-in drill quarterly. Some call-in drills will be unannounced. The scope of the off-hours call-in drill will require ERO member's response regarding ability to respond to their applicable facility within the required augmentation time. Each Table B-1 ERO member's ability to respond within the required augmentation time will be assessed at least biennially.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
205.		**Section N.4.j** Each Xcel Energy nuclear site will conduct a protective action drill within an eight-year cycle. The scope of the protective actions drill will demonstrate the ability to implement and coordinate protective actions for onsite personnel during a hostile action.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
206.		**Section N.4.k** Each Xcel Energy nuclear site will conduct an aircraft threat/attack response drill within an eight-year cycle.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
207.	5.8.2 Drills		
208.	A drill is a supervised instruction period aimed at testing, developing and maintaining skills in a particular operation.	**Section N.1** Drills are supervised instructional periods aimed at testing, developing and maintaining skills in a particular operation and are a part of the	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.

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209.	A drill is often a component of an exercise.	continuous training program and is often a component of an exercise.	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking.
210.	Each drill is supervised and evaluated by a qualified drill coordinator.	**Section N.1.a** Following exercises and drills, a critique is conducted by qualified Xcel Energy individuals to evaluate areas and identify issues with ERO performance, response procedures, facility and equipment adequacy. The critique is performed as soon as possible following the conclusion of a drill or exercise using preselected drill and exercise performance objectives that are evaluated against measurable demonstration criteria. Provisions are made for federal, state, and county representatives to observe and participate in drill and exercise critiques. A critique report is prepared by the EP group following a drill or exercise documenting objective demonstration. Failed or degraded performance objectives are entered into the corrective action program (CAP).	SEP retains the commitment to conduct a critique after all drills.
211.	The utility will conduct drills at intervals specified in site specific procedures and their respective Drill and Exercise Manual.	**Sections N.3 and N.4**	SEP standardizes the language between the three existing plans and is consistent with the requirements of the November 2011 Rulemaking
212.	5.8.3 Training		
213.	NSPM/Xcel Energy will assure that radiological emergency response training is provided to those who may be called upon to assist in an emergency.	**Section O.1.a** Xcel Energy offers emergency response training annually for those offsite organizations that may be called upon to provide onsite assistance in the event of an emergency. They are invited to	SEP standardizes the language between the three existing plans without changing existing practices or intent to train ORO personnel supporting response.

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214.	Training will also be provided for the person(s) designated as responsible for the planning effort.	attend training applicable to the Xcel Energy nuclear site or sites where they could provide assistance. Training of state and county offsite response organizations is described in their respective radiological emergency plans, with support provided by Xcel Energy, if requested.	SEP standardizes the language between the three existing plans without changing existing practices or intent to train ORO personnel supporting response.
215.	1. Qualification of and training for the Monticello and Prairie Island Offsite Emergency Response Organization consists of initial overview training and position specific training. The training program for site and EOF ERO members is described in the site-specific procedures.	**Section O.1** Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency. Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
216.	2. Initial Overview Training Training SHALL introduce the EP personnel to the basis for nuclear power plant radiological emergency preparedness. It should include: a. Protective Action Recommendations b. Emergency Action Levels and Classifications c. Introduction to Emergency Plans of Monticello, Prairie Island and local Government d. Emergency Response Organization and Communication e. EP Objectives	**Section O.2** The EP Training Program Description identifies the training requirements for initial qualification, continuing training, and requalification of the ERO. Training will be evaluated in accordance with the principles of the Systematic Approach to Training (SAT) practices to ensure effectiveness and in order to identify areas that need improvement or correction.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
217.	3. Position specific training SHALL qualify the EP personnel in the position for which they have been nominated. It should include: a. Detailed review of applicable procedures b. Opportunity to practice the role of nominated position c. Mini drill or table top simulations/discussions		SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.

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218.	The Utility will assist in the training of those offsite emergency organizations who may be called upon to provide assistance in the event of an emergency.	**Section O.1** Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency. Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
219.	Each offsite response organization will participate in and receive training which will be coordinated by the appropriate governmental agencies.	No equivalent statement	SEP documents the licensee commitment to offer training to appropriate ORO personnel. Management of the training population is outside the control of the site program.
220.	Where mutual aid agreements exist between local agencies such as fire, police, ambulance/rescue, and other departments that are members of the mutual aid district, training will also be offered.	**Section O.1** Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency. Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
221.	Annual training for hospital personnel, ambulance/rescue and fire departments will include the procedures for notification, basic radiation protection and the appropriate Implementing Procedures.		SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
222.	For local services and support organizations who may enter the site, training will include orientation to site access procedures and to the onsite emergency organization that will control the support activities.		SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
223.	All emergency organization members will be required to periodically participate in drills and exercises in which each person demonstrates the ability to perform his assigned tasks in an emergency situation.	**Section O.2.b** Training sessions providing performance enhancing opportunities for key positions are evaluated in order to identify weak or deficient areas that need correction for the key skills demonstrated.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.

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224.	Personnel who implement radiological facets of the Emergency Response Plan will receive a training program to qualify them, per the Implementing Procedures that pertain to surveys, accident assessment, decontamination, and emergency mitigation.	**Section O.1** Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency. Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
225.	Training was presented initially when all plans and procedures were finalized, and re training will be conducted annually in accordance with the Emergency Response Training Plans.		SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
226.	Emergency response personnel will be trained for the following categories: 1. Directors or Coordinators of the Emergency Response Organizations 2. Accident assessment personnel 3. Radiological monitoring teams and radiological analysis personnel 4. Security and fire-fighting personnel 5. Personnel responsible for transmission of emergency information and instructions 6. Onsite repair and damage control teams 7. First aid and rescue personnel 8. Medical support personnel 9. Local law enforcement personnel 10. Local Civil Defense/Emergency Service personnel 11. Media personnel 12. State Government Agencies	**Section O.1** Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency. Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
227.		**Section O.2.a** Revisions to the training program are identified with feedback from trainees in training and critique items during drills. EP training is also reviewed during EP assessments at the Xcel Energy nuclear sites. During assessments, ERO and EP staff performance is reviewed and appropriate revisions to the training program are made.	SEP standardizes the language between the three existing plans without changing past practices or intent to train the ERO.
228.	5.9 Maintenance of Plans and Procedures		

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229.	5.9.1 Review of Plans		
230.	In accordance with 10CFR 50.54(t) the Utilities Procedures and Surveillances provide for the conduct of an annual independent adequacy review of the Monticello and Prairie Island Offsite Emergency Preparedness Program. (The independent review may be conducted by either an internal or external organization.)	**Section P.9** An independent review will be conducted in accordance with the requirements of 10 CFR 50.54(t)(2). The review findings will be submitted to the appropriate corporate and site management. The part of the review involving the evaluation of the adequacy of interface with state and county governments will be reported to the appropriate state and county governments. Corporate or site management, as appropriate, will evaluate the findings affecting their area of responsibility and ensure effective corrective actions are taken. The results of the review, along with recommendations for improvements, will be documented, and retained.	SEP standardizes the language between the three existing plans without changing past practices or intent.
231.	Individuals who have no direct responsibility for implementation of the Emergency Preparedness Program will conduct the review.		SEP standardizes the language between the three existing plans without changing past practices or intent.
232.	The review will include the Emergency Plans, Implementing Procedures, training, readiness testing, interface with state and local organizations, and equipment.		SEP standardizes the language between the three existing plans without changing past practices or intent.
233.	Management controls will be implemented for evaluation and correction of review findings.		SEP standardizes the language between the three existing plans without changing past practices or intent.
234.	The result of the review will be documented, reported to appropriate organizational management and retained in accordance with 10 CFR 50.54(t) (2).		SEP standardizes the language between the three existing plans without changing past practices or intent.
235.	The part of the review involving the evaluation for adequacy of interface with state and local governments SHALL be made available to the appropriate state and local governments.		SEP standardizes the language between the three existing plans without changing past practices or intent.
236.	In addition, the Utility will review and update plans and procedures as needed and they will be certified to be current on an annual basis.	**Section P.4** The SEP and associated documents as identified herein, are reviewed on an annual basis and updated if necessary. Changes due to regulatory revisions, issues identified by drills and exercises, or other updates will be incorporated.	SEP standardizes the language between the three existing plans without changing past practices or intent.

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237.	The update will take into account changes identified during drills and exercises. Other reviews of the Emergency Plan and Implementing Procedures will be performed as required by Technical Specifications.	**Section P.4** Agreements with supporting organizations will be reviewed and certified to be current on an annual basis and updated, if necessary. Changes to agreements may be coordinated with the annual review of the SEP. Emergency Plan changes will be processed in accordance with 10 CFR 50.54(q) requirements and fleet document control/records management procedures. ETE updates are completed in accordance with 10 CFR 50, Appendix E, IV.4, 5 & 6.	SEP standardizes the language between the three existing plans without changing past practices or intent.
238.	5.9.2 Control of Plans and Procedures		
239.	Emergency Plans and approved changes will be distributed in a controlled manner. Assigned copies of state and local plans, required at specific locations within the NSPM/Xcel Energy organization, will be updated in the same controlled manner.	**Section P.5** Approved changes to the SEP, associated documents and implementing procedures will be transmitted in accordance with the distribution list maintained in the Electronic Document Management System (EDMS).	SEP standardizes the language between the three existing plans without changing past practices or intent.
240.	When making revisions to the Monticello and Prairie Island Off-site Nuclear Emergency Plan, the section of the plan containing the changes will be revised and issued as a whole.	**Section P.5** Approved changes to the SEP, associated documents and implementing procedures will be transmitted in accordance with the distribution list maintained in the Electronic Document Management System (EDMS).	Incorporation of the three plans and the maintenance of the change processed described in Section P.5 eliminates the need for the previously existing statement.
241.	The plan will be marked (side barred) to show where changes have been made. The review, revision and issuance of controlled copies of the Nuclear Emergency Plans will be conducted in accordance with standard Utility procedures for document control	No equivalent statement	The commitment to use the EDMS system documents the methodology for tracking changes.
242.	5.9.3 Surveillance Program		

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243.	A Surveillance Program has been developed to ensure that Monticello and Prairie Island Offsite Nuclear Emergency Plan facilities and procedures are in a current state of readiness.	**Section P.4** The SEP and associated documents as identified herein, are reviewed on an annual basis and updated if necessary. Changes due to regulatory revisions, issues identified by drills and exercises, or other updates will be incorporated. **Section P.11** Xcel Energy CAP is used to capture conditions that do not meet program regulations, requirements, or expectations, or are otherwise adverse to quality.	SEP Plan commitment to review the program and the subsequent commitment to use the formal CAP system standardizes the previous commitment.
244.	Communication links with federal, state, and county governments are tested monthly, and inventories of equipment are conducted quarterly	**Section F.3** Communications tests will be conducted and documented on the frequency specified below. The tests include provisions to ensure participants in the test are able to understand the content of the messages in the test. • Systems used to communicate with state and county government warning points within the plume exposure pathway EPZ will be tested monthly. • Systems used to communicate from the MCR, TSC, and EOF to NRC Headquarters and NRC Regional Office Operations Center are tested monthly.	SEP standardizes the language between the three existing plans without changing past practices or intent.

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245.	Communication links with federal, state, and county governments are tested monthly, and inventories of equipment are conducted quarterly.	• Systems used to communicate with state and county government EOCs are tested annually. • Systems used to communicate between Xcel Energy ERFs, and from the applicable ERF to the FMTs, are tested annually. • Systems used to communicate with Federal emergency response organizations are tested annually. • The ERDS is verified as connected and transmitting data on a quarterly basis. ANS testing frequency is described in site-specific annexes.	SEP standardizes the language between the three existing plans without changing past practices or intent.
246.	Surveillances have also been prepared to conduct the Annual Independent Review, Quarterly inventory, and the quarterly updating of emergency response telephone numbers.	**Section P.12** Changes in plant configuration are evaluated for their impact on the effectiveness of the emergency plan through the Applicability Determination process specified in Regulatory Affairs procedures and, if required, the 10 CFR 50.54(q) process specified in EP procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.
247.	The Emergency Planning Zone (EPZ) brochure/calendar, Ingestion Planning Zone (IPZ) brochure, and handouts for transients are reviewed annually and updated, as needed	**Section G.5** At least once a year, both states will conduct training programs or send mailings to acquaint the news media with the emergency plans and to provide information concerning radiation and points of contact for release of public information in an emergency. Xcel Energy has input to this process.	SEP standardizes the language between the three existing plans without changing past practices or intent.
248.	5.10 Emergency Medical Plan	**Section L**	
249.	5.10.1 Emergency Medical Plan Objective		

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250.	The purpose of this section is to provide an overview of the process to be followed to ensure that prompt, effective and complete medical assistance is available to a nuclear power plant employee in the event of an accident involving an injury or illness which may be complicated by radiation exposure and/or contamination.	**Section L.2.b** Arrangements have been made with local hospitals for the medical treatment of contaminated injured personnel. Primary and backup offsite medical facilities to treat contaminated injured personnel are described in the site-specific annexes.	SEP standardizes the language between the three existing plans without changing past practices or intent.
251.	To provide the best medical treatment possible for its employees, the Utility has made arrangements with certain off-site medical facilities to care for radiation complicated injuries or illnesses.		SEP standardizes the language between the three existing plans without changing past practices or intent.
252.	Because these facilities have special equipment, expertise and training, these facilities will be used for this infrequent, but specialized patient care.	**Section L.2.c** Xcel Energy personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Hospitals are equipped and hospital personnel trained to address contaminated injured individuals and basic training on the nature of radiological emergencies. Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.

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253.		**Section L.4** In addition to the information provided in element L.2, radiation monitoring is provided by Xcel Energy personnel whenever it becomes necessary to use an ambulance service for the transportation of contaminated persons. Injured personnel are evaluated for radiological contamination using contamination control practices to transport to a medical facility per radiation protection procedures. Xcel Energy personnel will assist with decontamination of transport vehicles if necessary. Ambulance services are described in the site-specific annexes.	SEP standardizes the language between the three existing plans without changing past practices or intent.
254.	Any referral of NSPM/Xcel Energy employees outside of this off-site medical system will be done at the direction of the Utility Medical Review Officer or as the family requests.	**Section L.2.d & L.2.e** Injured personnel are evaluated for radiological contamination prior to transport to a medical facility per radiation protection department procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.
255.	For Monticello Nuclear Generating Plant, the principle off site medical support consists of: • CentraCare Health EMS (ambulance) Monticello, MN • CentraCare Health, Monticello, MN • North Memorial Medical Center, Minneapolis, MN • Regions Hospital • St. Cloud Hospital (CentraCare) St Cloud, MN	Monticello Annex, Section L.2.b Also - See Monticello Justification Matrix for description contained in Monticello Annex.	Description of Site Specific Offsite Medical Support Facilities relocated to respective Site Annex.

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256.	For Prairie Island Nuclear Generating Plant the principle off site medical support consists of: • Red Wing Fire and Ambulance Service • Mayo Clinic Health System-Red Wing • Regions Hospital • North Memorial Medical Center, Minneapolis, MN	Prairie Island Annex, Section L.2.b Also - See Prairie Island Justification Matrix for description contained in Prairie Island Annex.	Description of Site Specific Offsite Medical Support Facilities relocated to respective Site Annex.
257.	5.10.2 Activation/Plant		
258.	1. The Shift Manager/Emergency Director is responsible for assessing the extent of injuries, radiation exposure and/or contamination that an individual may have received during their shift.	**Section B.1.a** The requirements for on-shift operations staff, security force staff, fire brigade and first aid staff are controlled by site-specific Technical Specifications and other site-specific licensing and administrative documents. Positions from these departments are contained in the emergency plan only when assigned an EP function that is performed during an event.	Provision revised to align with NUREG-0654, Revision 2, intent to align Plan to EP Functional performance and eliminate functions controlled by other site approved Plans/requirements.
259.	Their assessment of the personnel, injured with or without radiation exposure or contamination, is to include the need for offsite medical assistance.		Provision revised to align with NUREG-0654, Revision 2, intent to align Plan to EP Functional performance and eliminate functions controlled by other site approved Plans/requirements.
260.	The Shift Manager/Emergency Director can use any member of the Corporate Medical staff to evaluate the extent of such injuries, if such an individual is available.		Provision revised to align with NUREG-0654, Revision 2, intent to align Plan to EP Functional performance and eliminate functions controlled by other site approved Plans/requirements.
261.	Additionally, the Shift Manager/Emergency Director can use any available Health Physics expertise to evaluate the victim's radiation exposure or contamination.		Provision revised to align with NUREG-0654, Revision 2, intent to align Plan to EP Functional performance and eliminate functions controlled by other site approved Plans/requirements.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
262.	Once the Shift Manager/Emergency Director has determined that off-site medical assistance is necessary, it is their responsibility to ensure that the local medical hospital and ambulance group are contacted, in accordance with the Plant Emergency Implementing Procedures, to arrange for transportation of the victims.	**(Continued)**	Provision revised to align with NUREG-0654, Revision 2, intent to align Plan to EP Functional performance and eliminate functions controlled by other site approved Plans/requirements.
263.	2. The Plant Emergency Implementing Procedures describe how the hospital is to be notified and discusses what information the hospital needs to ensure their emergency rooms are prepared to receive the potentially contaminated/over exposed, injured victim.	**Section B.1.a** The requirements for on-shift operations staff, security force staff, fire brigade and first aid staff are controlled by site-specific Technical Specifications and other site-specific licensing and administrative documents. Positions from these departments are contained in the emergency plan only when assigned an EP function that is performed during an event.	Provision revised to align with NUREG-0654, Revision 2, intent to align Plan to EP Functional performance and eliminate functions controlled by other site approved Plans/requirements.
264.	5.10.3 Activation/Local Hospital		
265.	The local hospital or fire department is responsible for the transportation of all personnel from Monticello or Prairie Island Nuclear Generating sites.	**Section L.2.d** Injured personnel are evaluated for radiological contamination prior to transport to a medical facility per radiation protection department procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
266.	They will receive all NSPM/Xcel Energy personnel that are injured and/or contaminated and/or have received an overdose of ionizing radiation. The local hospital will provide initial medical treatment and decontamination care and, after the patient is stabilized, will arrange, if necessary, the transportation of patients to North Memorial Medical Center or Regions Hospital, via air or ambulance as weather dictates.	**Section L.2.c** Xcel Energy personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Hospitals are equipped and hospital personnel trained to address contaminated injured individuals and basic training on the nature of radiological emergencies. Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.
267.	Patients may be transferred directly to a Definitive Care Center if the injury(s) warrant.	No equivalent statement	The SEP retains the requirement to maintain offsite Medical support agreements as previously documented. Specific care practices are determined by the medical staff of the support facility and not Xcel Energy.
268.	Additionally, the local hospital could make contact with the Radiation Emergency Assistance Center/Training Site (REAC/TS) as deemed necessary, to seek further medical advice and expertise.	**Section A.1.a** Department of Energy (DOE)/Radiation Emergency Assistance Center/Training Site (REAC/TS) Support The DOE provides radiological assistance on request though the REAC/TS and has radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. Following a radiological incident, DOE operates as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP).	SEP standardizes the language between the three existing plans without changing past practices or intent.
269.	5.10.4 Activation/Definitive Care Center		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
270.	1. North Memorial Medical Center, located in Minneapolis and Regions Hospital in St. Paul, are designated by this Plan as Definitive Care Centers, in accordance with our current Letters of Agreement (Attachment 5).	**Section C.2** LOAs common to both sites include; • North Memorial Health Care • Regions Hospital	SEP standardizes the language between the three existing plans without changing past practices or intent.
271.	2. The Definitive Care Center will be responsible for providing definitive evaluation and treatment of more serious trauma, illness and for radiation overexposure. The personnel at the Definitive Care Center could contact the Radiation Emergency Assistance Center/Training Site (REAC/TS) for advice as necessary.	No equivalent statement	The SEP retains the requirement to maintain offsite Medical support agreements as previously documented. Specific care practices are determined by the medical staff of the support facility and not Xcel Energy.
272.	3. Should the need arise for further advanced medical treatment of radiation overexposure (for example, bone marrow transplant), this arrangement and decision will be made after evaluation of the patient by the medical staff at the Definitive Care Center, in consultation with the Utility Medical Review Officer/Medical Advisor, and any other medical consultants. The facilities (locally & nationally) able to perform this procedure will be described to the patient and family, and referral made according to their wishes.	No equivalent statement	The SEP retains the requirement to maintain offsite Medical support agreements as previously documented. Specific care practices are determined by the medical staff of the support facility and not Xcel Energy.
273.	5.10.5 Activation/Medical Resource Person		
274.	The Utility Medical Review Officer/Medical Advisor would be available to provide medical expertise on the extent of the injury, act as Company spokesperson, and assist in determination of when the services and/or advice of emergency medical assistance would be needed during a nuclear power plant event involving a contaminated/overexposed and/or injured individual.	No equivalent statement	The SEP retains the requirement to maintain offsite Medical support agreements as previously documented. Specific care practices are determined by the medical staff of the support facility and not Xcel Energy.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
275.	5.10.6 Activation of Emergency Medical Assistance		
276.	In the event of a suspected or actual radiation accident, where the aforementioned medical facilities need additional emergency medical assistance, this assistance can be provided by Radiation Emergency Assistance Center/Training Site (REAC/TS) and is available as a public agency on a 24-hour basis.	**Section L.2.e** Contact of the Radiation Emergency Assistance Center/Training Site (REAC/TS) is maintained per LOA.	The SEP retains the requirement to maintain offsite Medical support agreements as previously documented. Specific care practices are determined by the medical staff of the support facility and not Xcel Energy.
277.	The assistance is comprised of, but not limited to the following: 1. Upon notification, establish immediate means of communication between emergency response personnel and all other facilities involved in the management of the accident. 2. Provide consultation and laboratory services for the evaluation of the patient's radiological health status, if requested. 3. Assist the local hospital and/or the Definitive Care Center in the evaluation and the care of the accident victim. 4. Assist or provide a list of commercial entities that could provide support of the Utility Medical Review Officer/Medical Advisor in the arrangement for evacuation of the radiation over exposed patient(s) to a medical center for advanced treatment, if necessary.	**Section L.2.c** Xcel Energy personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Hospitals are equipped and hospital personnel trained to address contaminated injured individuals and basic training on the nature of radiological emergencies. Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.
278.	Additional medical consultants will be requested as determined by the Utility Emergency and Medical Management.		SEP standardizes the language between the three existing plans without changing past practices or intent.
279.	5.10.7 Multiple Patients		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
280.	If multiple patients result from an accident, they will be triaged and decontaminated, if necessary, according to accepted medical principles at each level of care, starting at the plant site.	**Section L.2.c** Xcel Energy personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Hospitals are equipped and hospital personnel trained to address contaminated injured individuals and basic training on the nature of radiological emergencies. Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.
281.	5.10.8 Medical Drills and Training	**Section L.2.b** Arrangements have been made with local hospitals for the medical treatment of contaminated injured personnel. Primary and backup offsite medical facilities to treat contaminated injured personnel are described in the site-specific annexes.	SEP standardizes the language between the three existing plans without changing past practices or intent.
282.	The objective of medical training and drills is to ensure prompt, effective and complete medical assistance is available to site personnel in the event of an accident involving injury which is complicated by radiation exposure and/or contamination.		
283.	To meet this objective, NSPM/Xcel Energy will provide training and conduct drills to ensure that personnel at all levels of care (plant, ambulance, local hospitals and occasionally, definitive care centers) can respond properly to a radiation emergency medical problem.	**Section N.4.a** Each Xcel Energy nuclear site will conduct an emergency medical drill once per calendar year. The scope of the emergency medical drill will include a simulated contaminated individual and invitation for participation by support services agencies.	SEP standardizes the language between the three existing plans without changing past practices or intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
284.	Training covering methods of dealing with radiation and contamination problems during a medical emergency will be provided annually for the following off-site and on-site Emergency Response groups: 1. Site First Responder Personnel 2. Local hospital personnel, Emergency Room staff 3. Physicians Training will be offered periodically 4. Ambulance personnel, Emergency Medical Technicians 5. Definitive Care personnel and other medical staff that may be involved in the care of patients with radiological concerns	**Section L.2.c** Xcel Energy personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Hospitals are equipped and hospital personnel trained to address contaminated injured individuals and basic training on the nature of radiological emergencies. Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.	SEP standardizes the language between the three existing plans without changing past practices or intent.
285.	All medical drills and training to support the Medical Plan are described in the Emergency Preparedness Training Program.	**Section N.4.a** Each Xcel Energy nuclear site will conduct an emergency medical drill once per calendar year. The scope of the emergency medical drill will include a simulated contaminated individual and invitation for participation by support services agencies.	SEP standardizes the language between the three existing plans without changing past practices or intent.
286.	5.10.9 Program Maintenance		

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
287.	In order to maintain an effective on-site and off-site response program, the following tasks will be performed: 1. Conduct periodic inventories of plant and hospital equipment and supplies used for handling radiation medical emergencies. Replenish supplies as necessary, based on inventory results or as requested by hospital or ambulance staff. The results of these periodic surveillances are to be filed by the respective plant. 2. Perform periodic review of hospital telephone numbers and communication checks. The responsibility of this review and communications check will be the respective plants for the local hospitals and the Offsite planning group will perform the communication check with North Memorial Medical Center and Regions Hospital. 3. Periodic review and inventories should be done at least annually.	No equivalent statement	The SEP retains the commitment for support agreements, training and periodic drills with offsite medical support facilities. NUREG-0654, Revision 2, no longer addresses procedural level detail needed to maintain these commitments.
288.	5.11 Implementing Procedures	**Section P.7, Table P.7-1**	
289.	FP-EP-IP-01, “Offsite Emergency Response Organization”	No equivalent statement	SEP will be supported by functional based procedures developed in conjunction with NRC approval of the Consolidated Plan. These procedures will be replaced in the implementation process.
290.	FP-EP-IP-02, “Emergency Organization Shift Turnover”	No equivalent statement	SEP will be supported by functional based procedures developed in conjunction with NRC approval of the Consolidated Plan. These procedures will be replaced in the implementation process.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
291.	FP-EP-IP-03, "Communication Equipment and Information"	No equivalent statement	SEP will be supported by functional based procedures developed in conjunction with NRC approval of the Consolidated Plan. These procedures will be replaced in the implementation process.
292.	FP-EP-IP-04, "Start-up and Operation of SEOC/JIC (and Remote Locations)"	No equivalent statement	SEP will be supported by functional based procedures developed in conjunction with NRC approval of the Consolidated Plan. These procedures will be replaced in the implementation process.
293.	Supplemental Procedure – Nuclear Communication Plan	No equivalent statement	SEP will be supported by functional based procedures developed in conjunction with NRC approval of the Consolidated Plan. These procedures will be replaced in the implementation process.
294.	**Plan Attachments**		
295.	Attachment 1 Offsite Emergency Response Organization Chart	SEP Table B-1 and Figures B-3 (EOF) and B-4 (JIV)	SEP consolidates the existing concept of onsite and offsite EROs into an integrated ERO.
296.	Attachment 2 Backup EOF Equipment	No equivalent statement	SEP proposes a consolidated EOF greater than 10 miles from the site eliminating the need for a specified BUEOF. See Enclosure 4 for description of proposed EOF.
297.	a. Corporate Phone System - A Failure Analysis of telephone lines has been conducted and it was determined that the Backup EOF has adequate failure protection. Telephone, radio, and private line circuits are spread between two feeder and riser cables to reduce the chances of a complete failure. Approximately two dozen commercial telephone lines are available for use.	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
298.	b. Facsimile Stations -Two facsimile machine extensions, to allow for incoming and outgoing faxes.	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
299.	c. 800 Mghz Paging System Radio	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
300.	d. NRC Phones - Should the NRC decide to co-locate at the Backup EOF, telephone lines have been assigned for this purpose.	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
301.	e. INPO Nuclear Network - A computer is available that can access the INPO Nuclear Network to send, receive, and retrieve messages.	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
302.	f. E-Mail - Equipment is available for sending electronic mail messages to both sites. Printers are available to print hard copies of messages sent.	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
303.	2. Backup EOF Phones Monticello Specific a. Technical Support Communicator (Status Board) Telephone extension b. Monticello Field Survey Team Radio	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
304.	3. Backup EOF Phones Prairie Island Specific a. Technical Support Communicator (Status Board) Prairie Island Plant extension b. Prairie Island Field Survey Team Radio	No equivalent statement	See Enclosure 4 for description of proposed EOF communication capabilities.
305.	4. Minnesota State EOC/JIC a. Telephone Lines - NSPM/XCEL ENERGY Executive Spokesperson 1) General Office extension and a Rice Street extension 2) Facsimile Machine – General Office extension 3) Facsimile Machine MN Dept. of Health extension b. 800 Mghz Paging System Radio	**Section G.2** The JIC provides the necessary structure and mechanism for organizing, developing, integrating, and delivering coordinated interagency messages via established plans, procedures, and strategies.	SEP standardizes the language between the three existing plans without changing past practices or intent.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
306.	Attachment 3 Monticello (Medical Care Chart)	**Corporate Plan Section L** **Monticello Site Annex Section L**	The Standard Plan and Site Annexes provide Medical Support in alignment with the format of NUREG-0654, Revision 2. Separate Medical Care Attachments are no longer required.
307.	Attachment 4 Prairie Island (Medical Care Chart)	**Corporate Plan Section L** **Prairie Island Site Annex Section L**	The Standard Plan and Site Annexes provide Medical Support in alignment with the format of NUREG-0654, Revision 2. Separate Medical Care Attachments are no longer required.
308.	Attachment 5 Letters of Agreement	**Section C.2** LOAs common to both sites include; • Institute of Nuclear Power Operations (INPO) • State of Minnesota, Department of Public Safety Division of Homeland Security and Emergency • Regions Hospital • Environmental Inc, Midwest Laboratory • Department of Energy – REAC/TS • North Memorial Health Care • Pooled Equipment Inventory Co (PEICo)	SEP standardizes the language between the three existing plans without changing past practices or intent.
309.	Attachment 6 Radiation Environment Monitoring Plan Activation of the Radiation Environmental Monitoring Program (REMP) is accomplished through existing Site Emergency Plan Implementing Procedures.	No equivalent statement	Incorporation of the three Emergency Plans into the consolidated SEP eliminates the need for the attachment.

	Current Corporate Emergency Plan FP-EP-Plan-01 Rev 9	Standard Emergency Plan or Site Annex Description	Justification
310.	In addition, a Letter of Agreement between the NSPM/Xcel Energy and Environmental, Inc. Midwest Laboratory exists which states Environmental, Inc. Midwest Laboratory will respond upon request to augment our environmental sampling and monitoring program.	**Section C.2** LOAs common to both sites include; • Environmental Inc, Midwest Laboratory	SEP standardizes the language between the three existing plans without changing past practices or intent.
311.	Attachment 7 Monticello and Prairie Island Conservative Guidance for PARs	**See SEP Section I**	Section I of the SEP provides overall guidance for the determination of PARs. Separate attachment no longer is required.
312.	Attachment 8 Evacuation Time Estimates – Prairie Island	**Prairie Island Evacuating Time Estimate (EPLAN-07)**	SEP incorporates the respective Plant ETEs into the Plan as a stand-alone document contained within the overall Plan Structure.
313.	Attachment 9 Evacuation Time Estimates – Monticello	**Monticello Evacuation Time Estimate Study (EPLAN-06)**	SEP incorporates the respective Plant ETEs into the Plan as a stand-alone document contained within the overall Plan Structure.
314.	Attachment 10 Offsite Nuclear Emergency Plan Cross-Reference Index	No equivalent statement	SEP structure has been developed to provide the cross-reference guidance to NUREG-0654 within the structure of the Plan itself. Cross reference attachment no longer required.

ENCLOSURE 3

ATTACHMENT 3

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

PRAIRIE ISLAND NUCLEAR GENERATING PLANT EMERGENCY PLAN JUSTIFICATION MATRIX

(170 Pages Follow)

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
1.	**Section 1.0 DEFINITIONS**	**Section III: Appendices, Appendix A**	
2.	Listed below are some terms in this plan along with the definitions that should be applied to these terms when they are used in this plan.	The following are definitions of terms commonly used in this Emergency Plan and each site-specific annex.	No change. Introductory statement.
3.	**1.1 Assessment Actions** - Actions taken during or after an accident to obtain and process information necessary to make decisions regarding emergency measures.	No equivalent statement	Terminology not used in Standard Plan.
4.	**1.2 Corrective Actions -** Emergency measures taken to terminate an emergency situation at or near the source in order to prevent or minimize a radioactive release, e.g., shutting down equipment, firefighting, repair and damage control, etc.	No equivalent statement	Terminology not used in Standard Plan.
5.	**1.3 Emergency Action level (EAL) -** A predetermined, site-specific, observable threshold for a plant Initiating Condition (IC) that places the plant in a given emergency class. An EAL can be: an instrument reading; an equipment status indicator; a measurable parameter (onsite or offsite); a discrete, observable event; results of analyses; entry into specific emergency operating procedures; or another phenomenon which, if it occurs, indicates entry into a particular emergency class.	**Section D.1.a** EALs at Xcel Energy nuclear sites have been developed in accordance with NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors." This guidance has been approved by the NRC and is applicable to the reactor design at Xcel Energy nuclear sites.	Criterion revised to reflect criterion as noted in NRC approved guidance.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
6.	**1.4 Emergency Class** - One of a minimum set of names or titles, established by the Nuclear Regulatory Commission (NRC), for grouping of normal nuclear power plant conditions according to (1) their relative radiological seriousness, and (2) the time sensitive onsite and off site radiological emergency preparedness actions necessary to respond to such conditions.	No equivalent statement	The Standard Plan does not provide this as a stand-alone definition but uses it in context in Section D Classification. There was no change in how the terminology was used in the Plan.
7.	The existing radiological emergency classes, in ascending order of seriousness, are called: Notification of Unusual Event (UE), Alert, Site Area Emergency (SAE), and General Emergency (GE).	No equivalent statement	The Standard Plan does not provide this as a stand-alone definition but uses it in context in Section D Classification. There was no change in how the terminology was used in the Plan.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
8.	**1.5 Emergency Director (ED)** - The Plant Manager or designee. This individual has overall responsibility and authority for managing the emergency effort within the plant. This person will also manage efforts external to the plant until the Emergency Operations Facility (EOF) Organization can relieve the ED of external tasks.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Provide overall ERO command and control until relieved. • Evaluate plant conditions and approve Emergency Action Level (EAL) classifications until relieved. • Approve Protective Action Recommendations (PARs) until relieved. • Authorize personnel dose extensions until relieved. • Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs until relieved. • Direct radiation protection activities, including Field Monitoring Team (FMT) direction until relieved. • Direct and approve notifications to state and county authorities until relieved.	Terminology standardized and revised to clarify specific responsibilities with respect to Emergency Plan functions.
9.	**1.6 Emergency Manager (EM)** - A designated member of site management. This person has the authority and responsibility for the management of (NSPM) Northern States Power Company – Minnesota overall response to an emergency. The EM will assume command and control at the Emergency Operations Facility and direct the NSPM response efforts.	**Section B.1.a** Emergency Manager • Provide overall event response and control • Approve notifications to state/local offsite agencies • Approve PARs	Terminology standardized and revised to clarify specific responsibilities with respect to Emergency Plan functions.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
10.	**1.7 Emergency Planning Zones** - a defined area around the plant to facilitate emergency planning by state and local authorities, to assure that prompt and effective actions are taken to protect the public in the event of a release of radioactive material. It is defined for:	**Appendix A** A defined area around the plant to facilitate emergency planning by state and local authorities, to assure that prompt and effective actions are taken to protect the public in the event of a release of radioactive material. It is defined for:	No Change
11.	**1.7.1 Plume Exposure Pathway** - a 10 mile radius around the plant where the principal exposure source is: (1) whole body exposure to gamma radiation from the plume and from deposited material; and (2) internal exposure from the inhaled radionuclides deposited in the body (Short Term Exposure).	**Appendix A** Plume Exposure Pathway – A 10-mile radius around the plant where the principal exposure source is: (1) whole body exposure to gamma radiation from the plume and from deposited material; and (2) inhalation exposure from the passing radioactive plume (Short Term Exposure).	No Change
12.	**1.7.2** Ingestion Exposure Pathway - a 50 mile radius around the plant where the principal exposure would be from the ingestion of contaminated water or foods such as milk or fresh vegetables (Long Term Exposure). The ingestion exposure pathway includes the plume exposure pathway	**Appendix A** Ingestion Exposure Pathway – A 50-mile radius around the plant where the principal exposure would be from the ingestion of contaminated water or foods such as milk or fresh vegetables (Long Term Exposure).	No Change
13.	**1.8 Emergency Worker** - Any individual involved in mitigating the consequences of an emergency situation and/or minimizing or preventing exposure to the offsite population. The emergency worker category includes emergency workers at the plant as well as individuals who are engaged in public service emergency activities - firemen, policemen, medical support, and certain public officials. .	**Appendix A** Any individual involved in mitigating the consequences of an emergency situation and/or minimizing or preventing exposure to the offsite population.	Language standardized in the proposed Plan without change in process or intent.
14.	These are people who voluntarily place themselves as emergency workers.	No equivalent statement	Language standardized in the proposed Plan without change in process or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
15.	**1.9 Exclusion Area** - The area surrounding the plant that is under direct Prairie Island Nuclear Generating Plant control. This includes the Corps of Engineering land north of plant and the islands located in the Mississippi River east of plant.	No equivalent statement	The term Exclusion Area is not used in Standard Plan.
16.	It is sized such that any individual located on its boundary would not exceed 25 REM whole body or 300 REM thyroid from I-131 for two hours immediately following the design basis accident (approximately 2340 feet out to boundary).	No equivalent statement	The term Exclusion Area is not used in Standard Plan.
17.	**1.10 Facility Activation** - An Emergency Response Facility is activated when the minimum staff per Figures 1 and 2 is available and the facility is ready to assume its assigned Emergency Plan functions and relieve the on-shift staff of those functions. Although the facility may be ready, the on-shift staff relief may be postponed in the interest of completing critical tasks prior to turnover.	**Appendix A** An Emergency Response Facility is activated when the minimum staff per Figures B-1, B-2 and B-3 are available and the facility is ready to assume its assigned Emergency Plan functions and relieve the on-shift staff of those functions. Although the facility may be ready, the on-shift staff relief may be postponed in the interests of completing critical tasks prior to turnover.	Language standardized in the proposed Plan without change in process or intent.
18.	**1.11 Initiating Condition (IC)** - One of a predetermined subset of nuclear power plant conditions when either the potential exists for a radiological emergency, or such an emergency has occurred.	**Section D.1.a** EALs at Xcel Energy nuclear sites have been developed in accordance with NEI 99-01 Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors." This guidance has been approved by the NRC and is applicable to the reactor design at Xcel Energy nuclear sites.	Terminology used as part of EAL description rather than stand-alone definition. Section D.1.a commits to use of NEI 99-01 EALs which uses IC as part of the EAL.
19.	**1.12 Northern States Power Company – Minnesota (NSPM) d/b/a Xcel Energy -** Operator of the Prairie Island Nuclear Generating Plant.	**Section I, Introduction, Purpose** The Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy.	Terminology not required as a separate Definition. Section I provided description of company and applicable

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
20.	**1.13 Protective Actions** - Emergency measures taken before or after a release of radioactive materials in order to prevent or minimize radiological exposures to the population.	**Appendix A** Emergency measures taken to avoid or reduce radiation dose. These commonly include sheltering, evacuation, and prophylaxis.	Language standardized in the Standard Plan.
21.	**1.14 Protective Action Guides (PAG) –** Projected dose to individuals, that warrants protective action prior to and/or following a radioactive release.	**Appendix A** Projected dose to individuals, that warrants protective action prior to and/or following a radioactive release.	No Change
22.	**1.15 Recovery Actions** - Actions taken after an emergency to restore the plant to normal.	No equivalent statement	Specific definition is not used in Standard Plan. Sampling capabilities are described in Section
23.	**1.16 Xcel Energy** - Operating Utility of Northern States Power Company – Minnesota.	**Section I: Introduction, Purpose** The Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy,	No change. Language standardized and clarified to better describe current corporate structure.
24.	**SECTION 2.0 SCOPE AND PURPOSE**	**Section I: Introduction**	
25.	In accordance with license conditions, 10 CFR Part 50, and NRC guidance, the Northern States Power Company – Minnesota (NSPM) has developed and implemented a radiological emergency response plan for the Prairie Island Nuclear Generating Plant (PINGP) and a joint off-site plan for the PINGP and the Monticello Nuclear Generating Plant. As asset owner NSPM, and Xcel Energy, the operating utility, retain all owner obligations.	In accordance with license conditions, 10 CFR Part 50, and NRC Regulatory Guidance, the Standard Emergency Plan (SEP) provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to power plants operated by Xcel Energy, and plant employees. Xcel Energy operates the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP).	No change. Language standardized and clarified to better describe current corporate structure.
26.	This Emergency Plan is applicable to Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2.	No equivalent statement	Incorporation of the site plans and corporate plan make the statement unnecessary.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
27.	In any emergency situation at Prairie Island, the initial response to activate the Emergency Plan is accomplished by the plant staff and, if needed, immediate actions may be required by local support agencies. The plant, during initial stages of the emergency situation, must function independently coordinating both onsite and offsite activities. The augmented response organization will assume those tasks external (offsite) to the plant, thus allowing the plant staff to be responsible for all onsite activities. This plan covers the actions and responsibilities of the PINGP Emergency Organization and the Emergency Operations Facility Organization. The purpose of the plan is to describe the following: **2.1** Organization and actions within the plant to control and limit the consequences of an accident **2.2** Organization and actions controlling site and offsite activities in the event of an uncontrolled release of radioactive material. This includes notification of and coordination with required offsite support agencies.	**Section I: Introduction/Scope** Detailed procedures concerning the implementation of the SEP are in the Emergency Plan Implementing Procedures (EPIPs). The EPIPs address the functional areas and actions that implement the plan and serve as the interface between the Emergency Plan, plant operations, security, and radiological control programs. Xcel Energy also has procedures in place that implement onsite protective actions and personnel accountability during hostile action threats or events that are appropriate for plant and environmental conditions. These procedures are available for use at the plants. There are supporting and complementing emergency plans, including those of federal agencies, the states of Minnesota and Wisconsin, the Prairie Island Indian Tribe and risk counties. Xcel Energy/Xcel Energy Chief Nuclear Officer has overall responsibility for maintaining a state of readiness to implement this Plan for the protection of plant personnel, the general public, and property from hazards associated with nuclear power generation facilities operated by the company.	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
28.	**2.3** Identifying and evaluating the consequences of accidents that may occur and affect the public and plant personnel.	See Scope description in Line 27	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
29.	**2.4** Describing the protective action levels and actions that are required to protect the public and plant personnel in the event of an accident.	See Scope description in Line 27	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
30.	**2.5** Consideration necessary for the purpose of reentry and short-term recovery.	See Scope description in Line 27	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
31.	**2.6** Arrangements required for medical support in the event of injury.	See Scope description in Line 27	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
32.	**2.7** Arrangements required for fire fighting support in the event of major fires requiring outside support.	See Scope description in Line 27	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
33.	**2.8** The training necessary to assure adequate response to emergencies.	See Scope description in Line 27	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
34.	The Emergency Plan is dependent upon various standing plant operating, abnormal operating, emergency operating, plant safety, radiological control and security procedures and the Emergency Plan Implementing Procedures for the implementation of the plant's response to the spectrum of emergency situations.	See Scope description in Line 27	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
35.	PINGP has procedures in place that implement on-site protective actions and personnel accountability during security events that are appropriate for plant and environmental conditions.	See Scope description in Line 27	Language updated and standardized between the three existing plans and modified to align with NUREG-0654, Revision 2 elements.
36.	Coordination between plant, state, local and tribal authorities is defined in the Minnesota and Wisconsin state emergency operations plans, Goodhue, Dakota and Pierce county emergency plans and the Prairie Island Indian Community's emergency plan.	No equivalent statement	NUREG-0654 elements reflect licensee requirements. Standard Plan maintains the commitment to implement the Standard Plan to support offsite plans without discussing offsite responsibilities.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
37.	Goodhue, Dakota and Pierce Counties have, formulated for their respective areas, individual evacuation plans which are included in the respective state plans.	No equivalent statement	NUREG-0654 elements reflect licensee requirements. Standard Plan maintains the commitment to implement the Standard Plan to support offsite plans without discussing offsite responsibilities.
38.	Monticello & Prairie Island (MT & PI) offsite response is detailed in the Corporate Nuclear Emergency Plan.	No equivalent statement	Standard Plan incorporates the site Plans and the Corporate Plan into a single Plan making the statement unnecessary.
39.	**SECTION 3.0 SUMMARY**		
40.	Abnormal events, both realized and potential, requiring emergency preparedness response are classified into four classes of Emergency Action Levels. The four levels of emergency classes, in increasing order of severity are: 3.1 Notification of Unusual Event (UE) 3.2 Alert 3.3 Site Area Emergency (SAE) 3.4 General Emergency (GE)	**Section D.1** Contains classification levels and descriptions. (not repeated due to bulk)	Organization of the plan was aligned to structure of NUREG-0654, Revision 2. Language moved without Change in practice or intent to Section D.
41.	Each class requires specific immediate actions on the part of the plant staff in order to protect the public, plant personnel and property. As the severity level of the emergency increases, so does the response of the offsite agencies, in order to protect the public.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Table is used to document specific expected actions for each level.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
42.	The lowest class (least severe) is the Notification of Unusual Event, and will be handled mainly by plant personnel, with only advisory notification to local and state authorities. The Alert Classification requires prompt notification of local and state authorities, which will place their various organizations in a standby mode. In both the Notification of Unusual Event and the Alert Classification, the plant staff is expected to restore the situation to normal without further or minimum involvement of offsite authorities. The two higher severity classes, the Site Area and General Emergency, (the General Emergency being the most severe), requires prompt notification of offsite authorities with immediate involvement of those organizations to assess the emergency situation and to implement the required protective actions for the general public.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Table is used to document specific expected actions for each level.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
43.	During an Alert, Site Area, or General Emergency, Prairie Island Nuclear Generating Plant will automatically activate their site and offsite support emergency response organizations. The normal site organization will staff the Plant Emergency Response Organization and the Emergency Operations Facility (EOF) Organization. The offsite organization will be staffed by members of the MT & PI Offsite Organization and be located at the Minnesota Emergency Operations Center. MT & PI Offsite Organization will communicate to the plant via the EOF Organization.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Table is used to document specific expected actions for each level.
44.	The EOF Organization will support emergency response for the plant and relieve plant personnel of offsite activities who may be needed for plant activities.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Table is used to document specific expected actions for each level.
45.	When plant conditions stabilize and the potential for future degradation of plant conditions is small, the plant may terminate the emergency classification. If severe equipment or core damage has occurred, a transition to a recovery phase may be warranted. In general terms, an Unusual Event or Alert may be terminated without transition to Recovery while a Site Area Emergency or General Emergency will probably necessitate a planned transition to Recovery and the establishment of a Recovery Organization. The Recovery Organization will manage the overall recovery or post-accident outage plans as work is done to return the plant to a normal operational or shutdown status.	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area or General Emergency classification to an outage organization.	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
46.	PINGP has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL has been exceeded. Upon identification of the appropriate emergency classification level the emergency condition will be promptly declared.	**Section D.2** Xcel Energy has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded.	No Change
47.	**SECTION 4.0 EMERGENCY CONDITIONS**		
48.	**4.1** Classification System **-** Four Emergency Classification Levels (ECLs) are established, according to severity, taking into consideration potential as well as actual events in progress. Initiating Conditions (ICs) are predetermined subset of plant conditions when either the potential exists for a radiological emergency, or such an emergency has occurred. Emergency Action Levels (EALs) are plant-specific indications, conditions or instrument readings that are utilized to classify emergency conditions.	**Section D.1** Contains classification levels and descriptions. (not repeated due to bulk)	Organization of the plan was aligned to structure of NUREG-0654, Revision 2. Language moved without Change in practice or intent to Section D.
49.	Annex A contains the Emergency Action Level (EAL) scheme as established by NEI 99-01, Revision 6.	**Section D.1** Xcel Energy has established and maintains a standard emergency classification and emergency action level scheme. EPLAN-04, Monticello Nuclear Generating Plant Emergency Action Levels EPLAN-05, Prairie Island Nuclear Generating Plant Emergency Action Levels	The Standard Plan standardizes the format for the Classification Process. Site Specific Plan documents contain the NEI 99-01 EAL scheme previously approved by the NRC for each site.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
50.	It should be noted that various events could require a graded scale of response. A minor incident could increase in severity and advance to the next class of emergency. This Emergency Plan is constructed to provide for a smooth transition from one class to another.	**Section D.1.a** EALs at Xcel Energy nuclear sites have been developed in accordance with NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors." This guidance has been approved by the NRC and is applicable to the reactor design at Xcel Energy nuclear sites. **Table D.3-1, Matrix of Emergency Response Measures by ECL**	The NEI 99-01 incorporates the graded scale of response. Table D.3-1 provides the specific actions taken at the various levels.
51.	**4.1.1** Notification of Unusual Event (UE) Notification of Unusual Events are events that are in process or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.	**Section D.1** <u>Unusual Event (UE)</u> Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.	Language standardized in the proposed Plan without change in process or intent.
52.	The purpose of the Notification of Unusual Event action level is to: (1) have the operating staff come to a state of readiness from the standpoint of emergency response in the event the handling of the initiating condition requires escalation to a more severe action level class; and	**Section D.1** <u>Unusual Event (UE)</u> Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs. **Table D.3-1, Matrix of Emergency Response Measures by ECL**	Standard Plan provides definition of Unusual Event and Table D.3-1 provides the level specific actions.

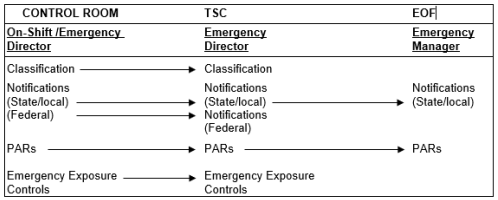
	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
53.	(2) provide for systematic handling of unusual event information, i.e., to provide early and prompt notification of minor events which could lead to more serious consequences given operator error or equipment failure or which might be indicative of more serious conditions which are not yet fully realized.	No equivalent statement	Standard Plan provides definition of Unusual Event and Table D.3-1 provides the level specific actions.
54.	**4.1.2** Alert - At the Alert action level, events are in process or have occurred which involve actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. It is the lowest level when some necessity for emergency planning and response offsite is necessary. Any radioactive release will be limited to a small fraction of the EPA Protective Action Guideline exposure levels.	**Section D.1** Alert Events are in progress, or have occurred, which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life-threatening risk to site personnel or damage to site equipment because of hostile action. Any releases are expected to be small fractions of the EPA Protective Action Guideline exposure levels.	Language standardized in the proposed Plan without change in process or intent.
55.	The purpose of the Alert action level is to: (1) assure that emergency personnel are readily available to respond if the situation becomes more serious or to perform confirmatory radiation monitoring if required; and (2) provide offsite authorities current status information, i.e., early and prompt notification of minor events which could lead to more serious consequences given operator error or equipment failure or which might be indicative of more serious conditions which are not yet fully realized.	**Section D.1,** Alert Events are in progress, or have occurred, which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life-threatening risk to site personnel or damage to site equipment because of hostile action. Any releases are expected to be small fractions of the EPA Protective Action Guideline exposure levels. **Table D.3-1, Matrix of Emergency Response Measures by ECL**	Standard Plan provides definition of Alert and Table D.3-1 provides the level specific actions.

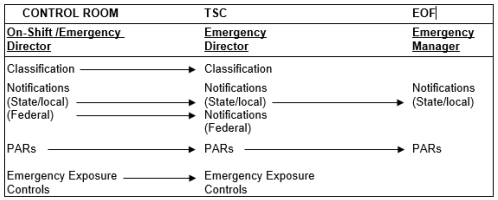
	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
56.	**4.1.3** Site Area Emergency - The Site Area Emergency action level describes events that are in process or have occurred which involve actual or likely major failure of plant functions needed for protection of the public or HOSTILE ACTION that result in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) that prevent effective access to equipment needed for the protection of the public. It reflects conditions where significant offsite releases are likely to occur or are occurring but where a core melt situation is not expected although severe fuel damage may have occurred. Any radioactive releases are not expected to exceed the EPA Protective Action Guideline exposure levels except near the site boundary.	**Section D.1** Site Area Emergency (SAE) Events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or hostile action that results in intentional damage or malicious acts; 1) toward site personnel or equipment that could lead to the likely failure of or; 2) that prevent effective access to, equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA PAG exposure levels beyond the site boundary.	Language standardized in the proposed Plan without change in process or intent.
57.	The purpose of the Site Area Emergency action level is to: (1) assure that response centers are manned; (2) assure that monitoring teams are dispatched; (3) assure that personnel required for evacuation of near-site areas are at duty stations if the situation becomes more serious; (4) provide current information for and consultation with offsite authorities; and (5) provide updates for the public through offsite authorities.	**Section D.1** Site Area Emergency (SAE) Events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or hostile action that results in intentional damage or malicious acts; 1) toward site personnel or equipment that could lead to the likely failure of or; 2) that prevent effective access to, equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA PAG exposure levels beyond the site boundary **Table D.3-1, Matrix of Emergency Response Measures by ECL, pg. 35**	Standard Plan provides definition of Site Area Emergency and Table D.3-1 provides the level specific actions.

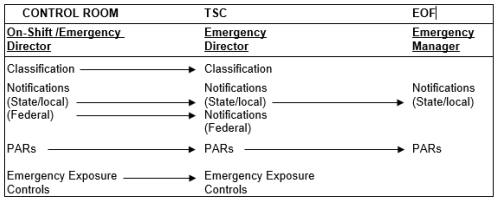
	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
58.	**4.1.4** General Emergency **-** The General Emergency action level describes events in process or have occurred which involve actual or imminent substantial core degradation or melting with the potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Radioactive releases can be reasonably expected to exceed the EPA Protective Action Guidelines exposure levels offsite for more than the immediate site area.	**Section D.1** General Emergency (GE) Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or hostile actions that result in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA PAG exposure levels offsite for more than the immediate site area.	Language standardized in the proposed Plan without change in process or intent.
59.	The purpose of the General Emergency class is to: (1) initiate predetermined protective actions for the public; (2) provide continuous assessment of information from licensee and offsite organization measurements; (3) initiate additional measures as indicated by actual or potential releases;	**Section D** General Emergency (GE) Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or hostile actions that result in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA PAG exposure levels offsite for more than the immediate site area.	Standard Plan provides definition of Site Area Emergency and Table D.3-1 provides the level specific actions.
60.	(4) provide consultation with offsite authorities; and (5) provide updates for the public through offsite authorities.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Language standardized in the proposed Plan without change in process or intent.
61.	**SECTION 5.0 ORGANIZATIONAL CONTROL OF EMERGENCIES**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
62.	**5.1** Normal Site Organization - The normal site organization is comprised of the plant organization and several other site support organizations. The normal site organization can be accessed on the Prairie Island web page. Responsibilities and authorities of the various functional groups are delineated in plant Administrative Work Instructions.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of the 'normal' organization to focus on the requirements for organization response to activation of the Plan as described in Section C.
63.	**5.2** Normal Plant Organization - The normal plant operating crew is staffed and qualified to perform all actions that may be necessary to initiate immediate protective actions and to implement the emergency plan and is designated as the responsible group for such actions. The normal plant organization can be accessed on the Prairie Island web page.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of the 'normal' organization to focus on the requirements for organization response to activation of the Plan as described in Section C.
64.	The Plant Manager has overall responsibility for the safe, efficient operation of the plant and for compliance with operating license requirements. The Plant Manager SHALL select, train and supervise a qualified staff.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of the 'normal' organization to focus on the requirements for organization response to activation of the Plan as described in Section C.
65.	The Shift Manager reports directly to the Assistant Operations Manager who reports directly to the Operations Manager who reports directly to the Plant Manager.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of the 'normal' organization to focus on the requirements for organization response to activation of the Plan as described in Section C.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
66.	The Shift Manager is responsible for the direction and coordination of the Shift Supervisors on his/her shift to perform operations in accordance with the administrative controls and operating procedures. The Shift Manager coordinates activities with other plant groups as required to maintain the safe operation of the plant.	**Section B.1.a** The requirements for on-shift operations staff, security force staff, fire brigade and first aid staff are controlled by site-specific Technical Specifications and other site-specific licensing and administrative documents. Positions from these departments are contained in the emergency plan only when assigned an EP function that is performed during an event.	NUREG-0654, Revision 2, formatting eliminates the description of the 'normal' organization to focus on the requirements for organization response to activation of the Plan as described in Section C.
67.	The Shift Supervisor reports to the Shift Manager. The Shift Supervisor is the single focal point for directing and coordinating the operations group, maintenance group and the plant security activities during his/her shift. The Shift Supervisor SHALL assume the primary management responsibility for the safe operation of the plant under all conditions during his/her shift. The responsibility and authority of the Shift Supervisor SHALL be to maintain the broadest perspective of operational conditions affecting the safety of the plant as a matter of highest priority at all times when on duty in the Control Room.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of the 'normal' organization to focus on the requirements for organization response to activation of the Plan as described in Section C.
68.	**5.3** Plant Emergency Organization **-** A plant emergency organization is designated to augment the normal operating crew. Provisions have been made for rapid assignment of plant personnel to the plant emergency organization during emergency situations. The Prairie Island Plant Emergency Organization is shown in Figure 1.	No equivalent statement	Paragraph eliminated from Standard Plan. Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
69.	Various areas of responsibility are assigned to segments of the plant staff during emergency situations as depicted in Table 1. Table 1 shows the personnel available on-shift and the capability for additional personnel within 60 minutes and 90 minutes of event declaration. Table 1 follows the guidance developed in accordance with 10 CFR 50 Appendix E. This staffing analysis is documented in F3-1.1, Emergency Plan On-Shift Staffing.	**Section B.1.a** Site-specific on-shift staffing analysis reports are developed in accordance with 10 CFR 50. (EPLAN-08, EPLAN-09)	Language standardized between the three Plans without change of intent.
70.	**5.3.1** Direction and Coordination - During the initial stages of an emergency condition at Prairie Island Nuclear Generating Plant, the Emergency Director has overall coordinating authority for Northern States Power Company – Minnesota (NSPM). The Emergency Director alone has the authority and responsibility to immediately initiate any emergency actions, including providing protective action recommendations to offsite authorities responsible for implementing offsite emergency measures.	**Section B.2.a** 	Standard Plan revises the key functional areas of responsibility into a table showing clear assignment by facility and time.
71.	The Shift Supervisor, of the affected unit, until properly relieved, SHALL remain in the Control Room at all times during accident situations, to direct the activities of control room operators. If necessary, the Shift Supervisor of the unaffected unit may function as an alternate Emergency Director backing up the Shift Manager.	No equivalent statement	Paragraph eliminated from Standard Plan. Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
72.	Twenty-four (24) hour coverage for the Emergency Director position is provided by the Duty Shift Manager who assumes the responsibility of the TSC Emergency Director at the onset of any emergency condition.	**Section A.5** Xcel Energy maintains an ERO that is capable of providing continuous, 24 hour/day, operation for an extended period of time. The shift rotations for the protracted period will be designated by the Emergency Manager.	No change
73.	When the Technical Support Center (TSC) and Emergency Operations Facility (EOF) Organizations are activated, the Emergency Director (ED) and TSC staff will relieve the Emergency Director on shift of command and control functions as soon as practical and assume the responsibility for the management of NSPM's overall response to the emergency. The Emergency Director on shift can then direct the plant's priorities for event responses. Upon activation of the EOF, responsibility for offsite functions of notification and protective action recommendations transfer from the TSC to the EOF Emergency Manager (EM). The transition of command and control functions is depicted below. (Chart)	**Section B.2.a** 	Standard Plan revises the key functional areas of responsibility into a table showing clear assignment by facility and time.
74.	**Command and Control Table**		
75.	**Figure 1 Prairie Island Plant Emergency Organization (Chart 2 pages)**	**Figure B-1, TSC Organization** **Figure B-2, OSC Organization**	Paragraph eliminated from Standard Plan. Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
76.	**Table 1 Guidance for Augmentation of Plant Emergency Organization (Chart 3 pages)**	**Table B-1, Minimum On-Shift and Augmented Staffing**	Paragraph eliminated from Standard Plan. Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
77.	The Shift Manager SHALL be relieved of the Emergency Director responsibilities when the designated Emergency Director arrives onsite. The Plant Manager or Designee SHALL be the designated Emergency Director and will be available with a pager on a twenty-four (24) hour basis. When the Plant Manager is unavailable, (e.g., out of town), the designated Emergency Director responsibility will be passed onto another Plant Manager designee who is a member of senior plant management. Specific personnel assignments to the Emergency Director position are found in the MT & PI Nuclear Emergency Preparedness Telephone Directory.	**Section B.2.a**  	Standard Plan revises the key functional areas of responsibility into a table showing clear assignment by facility and time.
78.	The Shift Manager SHALL start the tasks assigned to the Emergency Director, (e.g., notification, activating onsite centers, etc.). These tasks SHALL be accomplished promptly and cannot wait for the designated individual to arrive at the plant site.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Provide overall ERO command and control until relieved. • Evaluate plant conditions and approve Emergency Action Level (EAL) classifications until relieved.	Terminology standardized and revised to clarify specific responsibilities with respect to Emergency Plan functions.
79.	The Emergency Director's responsibilities are as follows:	**Section B.1.a** Shift Manager/Emergency Director (SM/ED)	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
80.	**A.** Activation of onsite emergency organization 1. Direct the activation of the onsite emergency response centers and monitor their habitability, and 2. Coordinate response of the plant onsite emergency organization.	**Section B.1.a** • Provide overall ERO command and control until relieved.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
81.	**B.** Personnel accountability - During a plant evacuation the Emergency Director SHALL account for all personnel onsite within thirty minutes of the Site Area or General Emergency requiring the evacuation so that a search for missing personnel can be conducted. A continuous personnel accountability SHALL be maintained throughout the emergency. This responsibility may be delegated to a designated individual with assistance from the security force.	**Section B.1.a** • Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs until relieved.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
82.	**C.** Radiological monitoring - The Emergency Director SHALL direct radiological monitoring of all personnel onsite and at the onsite assembly area, for contamination and/or excessive exposure. This responsibility may be delegated to the Radiation Protection Specialists or to a qualified operations member.	**Section B.1.a** • Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs until relieved.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
83.	**D.** Exposure - The Emergency Director SHALL be responsible to authorize overexposures in excess of the normal limits (this responsibility may not be delegated).	**Section B.1.a** • Authorize personnel dose extensions until relieved.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
84.	**E.** Radiation Survey Teams - The Emergency Director SHALL direct the Radiation Survey Teams to obtain the necessary onsite and offsite samples and/or radiation surveys. This responsibility may be delegated to the Radiological Emergency Coordinator.	**Section B.1.a** • Direct radiation protection activities, including Field Monitoring Team (FMT) direction until relieved.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
85.	**F.** Offsite Dose Projections - The Emergency Director SHALL be responsible to project dose rates to the offsite population. This responsibility may be delegated to the Radiological Emergency Coordinator.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
86.	**G.** Protective Action - The Emergency Director SHALL be responsible for authorizing offsite Protective Action Recommendations (this responsibility may not be delegated and is relinquished to the Emergency Manager when the EOF is activated).	**Section B.1.a** • Approve Protective Action Recommendations (PARs) until relieved.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
87.	**H.** Notification - The Emergency Director SHALL be responsible to ensure that the necessary offsite notifications are initiated and completed. This responsibility may be delegated to the Shift Emergency Communicator (SEC). The SEC may designate offsite communications to a qualified Communicator.	**Section B.1.a** • Direct and approve notifications to state and county authorities until relieved.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
88.	**1.** Immediate (within 15 minutes) The initial notification message to State, local and tribal authorities, from the plant, SHALL contain the following information: A Class of emergency B Whether radioactivity is being released and in what form (liquid or gas) C Potentially affected populace and area, if any D Necessity of protective measures E Brief description of the event	**Section E.3** In conjunction with state and county authorities, Xcel Energy sites have established the content of the initial notification message to be used during an emergency. Initial notification will include the following: • Site name • ECL • Release status • PAR, if applicable	The standard plan retains the licensee responsibility to notify ORO's of a radioactive release. NUREG-0654, Revision 2, element I.2 assigns the responsibility for the assessment of liquid releases to the ORO's. Actions taken following that assessment will be driven by offsite plans/procedures rather than the Standard Plan.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
89.	Other information, i.e., meteorological data, etc., are available to these authorities via the follow-up notification messages.	**Section E.1.a** Follow-up messages are provided periodically to the appropriate offsite authorities. For long duration events with little change in information between messages, the follow-up message time interval can be increased as agreed upon by affected agencies.	Standard plan maintains the commitment for providing follow up messages.
90.	**2.** Subsequent Messages The plant will continue to provide updating information to offsite authorities. As soon as possible after the initial notification of an Alert, Site Area, or General Emergency, as much of the following information that is known and appropriate will be forwarded to offsite authorities:	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Language standardized between the three plans without change in practice or intent.
91.	A. Location of incident B. Name and telephone number of caller C. Date/time of incident D. Class of emergency E. Type of release (airborne, liquid, surface spill) and estimated duration. F. Estimate of noble gas, iodine, and particulate release rates.	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Language standardized between the three plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
92.	G. Prevailing weather conditions (wind speed, wind direction, temperature, atmospheric stability class, precipitation, if any). H. Actual or projected dose rates at site boundary. I. Projected dose rate and integrated dose at 2, 5 and 10 miles and the Sectors affected. J. Survey results of offsite dose rates or any surface contamination. K. Plant emergency response actions in progress. L. Request for onsite support from offsite support organizations.	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Language standardized between the three plans without change in practice or intent.
93.	M. Prognosis for worsening or termination of event based on plant information. To provide ease in supplying the aforementioned information, a standardized form is used and incorporated into the implementing procedures.	**Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures.	Language standardized between the three plans without change in practice or intent.
94.	I. Protracted Emergency Shift Coverage - The Emergency Director, with assistance from and coordination with other group Managers and Supervisors, SHALL ensure that work force requirements for all subsequent work shifts are determined and the necessary personnel are scheduled for the specific time period.	**Section A.5** Xcel Energy maintains an ERO that is capable of providing continuous 24 hour/day operations for an extended period of time. The shift rotations for the protracted period will be designated by the Emergency Manager.	Language standardized between the three plans without change in practice or intent.
95.	**5.3.2 Plant Emergency Organization Coordinators**		
96.	**A. Technical Support Center Coordinator**	**Section B.1.a** TSC Manager	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
97.	The Technical Support Center (TSC) Coordinator SHALL be responsible for the general activation, operation and coordination of activities in the Technical Support Center (TSC). Specific personnel assignments to the TSC Coordinator are found in the MT & PI Nuclear Emergency Preparedness Telephone Directory.	**Section B.1.a** TSC Manager • Supervise TSC staffing and activities • Assist the Emergency Director as needed	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
98.	The responsibilities of the TSC Coordinator are: 1. Establish and verify radiological monitoring for the TSC; 2. Assist personnel performing the accountability check; 3. Coordinate activities of plant and non-plant personnel located in the TSC;	**Section B.1.a** TSC Manager • Supervise TSC staffing and activities • Assist the Emergency Director as needed	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
99.	4. Periodically update personnel located in the TSC with appropriate information; 5. Maintain any necessary status boards; 6. Ensure technical guidance is provided to the Emergency Director and Control Room Operators on plant operations; 7. Establish or ensure that communications are established between all onsite emergency facilities and the EOF. 8. Ensure the Emergency Response Data System data link is established with the NRC's emergency center.	**Section B.1.a** TSC Manager • Supervise TSC staffing and activities • Assist the Emergency Director as needed	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
100	**B. Operational Support Center Coordinator**	**Section B.1.a** OSC Coordinator	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
101	The Operational Support Center Coordinator SHALL be responsible for the general activation, operation, and coordination of activities in the Operational Support Center (OSC). Specific personnel assignments to the OSC Coordinator are found in the MT & PI Nuclear Emergency Preparedness Telephone Directory.	**Section B.1.a** OSC Coordinator Coordinate OSC staffing and activities	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
102	The responsibilities of the OSC Coordinator are: 1. Establish and verify radiological monitoring for the OSC and the Control Room; 2. Coordinate activities of plant personnel located in the OSC to support plant operations as requested by the Control Room and TSC.	**Section B.1.a** OSC Coordinator Coordinate OSC staffing and activities	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
103	3. Assist personnel performing the accountability check in the OSC and the Control Room. 4. Maintain the communication systems in the OSC. A person may be designated to act as a communicator. 5. Periodically update personnel located in the OSC with appropriate information. 6. Control the use of equipment located in the emergency locker.	**Section B.1.a** OSC Coordinator Coordinate OSC staffing and activities	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
104	**C. Assembly Point Coordinator**	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
105	The Assembly Point Coordinator SHALL be responsible for the general operation of the assembly area. Specific personnel assignments to the Assembly Point Coordinator are found in the MT & PI Nuclear Emergency Preparedness Telephone Directory.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
106	The responsibilities of the Assembly Point Coordinator are: 1. Verify that radiological monitoring has been established for the Assembly Point. 2. Coordinate activities of all personnel (plant and non-plant) located at the Assembly Point. 3. Assist the Emergency Director in performing the accountability check, as necessary. 4. Maintain the communication systems. A person may be designated as the communicator, if necessary. 5. Control the use of equipment located in the Emergency Locker.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
107	6. Update all personnel with appropriate information when directed by the Emergency Director. 7. Provide instructions to personnel when they are released from the assembly point for reentry or transport offsite.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
108	**D. Radiological Emergency Coordinator**	**Section B.1.a** Radiological Assessment Coordinator	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
109	The Radiological Emergency Coordinator (REC) SHALL be responsible for radiological accident assessment, onsite and offsite. The REC should report to the Technical Support Center when the TSC is activated. Upon activation of the EOF, the Radiation Protection Support Supervisor will assume responsibility for the offsite activities.	**Section B.1.a** Technical Support Center (TSC) Radiological Assessment Coordinator • Develop and recommend PARs • Communicate changes to plant radiological conditions • Provide oversight for facility habitability surveys **Section B.1.a** Emergency Operations Facility (EOF) Radiological Assessment Coordinator • Assess and communicate offsite radiological conditions • Provide oversite for dose assessments and projections • Develop and recommend PARs	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
110	The REC should transfer the responsibility for offsite accident assessment to the Radiation Protection Support Supervisor at the EOF. Specific personnel assignments to the Radiological Emergency Coordinator are found in the MT & PI Nuclear Emergency Preparedness Telephone Directory.	**Section B.1.a** Emergency Operations Facility (EOF) Emergency Manager • Provide overall event response and control • Approve notifications to state/local offsite agencies • Approve PARs	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
111	The responsibilities of the REC are: 1. Offsite dose assessment 2. Formulating offsite protective action recommendations 3. Offsite surveys 4. Onsite surveys 5. Chemistry 6. Radiochemistry	**Section B.1.a** Technical Support Center (TSC) Radiological Assessment Coordinator • Develop and recommend PARs • Communicate changes to plant radiological conditions • Provide oversight for facility habitability surveys	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
112	7. Onsite Radiation Protection for: A. Access Control B. Damage control and repair C. Search and rescue D. First-aid E. Personnel monitoring and decontamination F. Dosimetry	**Section B.1.a** Operational Support Center (OSC) RP Coordinator • Provide oversite for OSC activities related to radiological surveys and monitoring of radiological conditions in the plant.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
113	**5.3.3 Plant Shift Organization**		
114	The following groups comprise the plant's shift organization. Brief descriptions of their emergency responsibilities are included.	No equivalent statement	Introduction statement not used in Standard Plan.
115	**A. Operations Group**		
116	The Operations Group consists of the Operations Manager, Asst. Operations Manager, Shift Managers, Shift Technical Advisors, Shift Supervisors, and all operators.	**Section B.1.a** The requirements for on-shift operations staff, security force staff, fire brigade and first aid staff are controlled by site-specific Technical Specifications and other site-specific licensing and administrative documents. Positions from these departments are contained in the emergency plan only when assigned an EP function that is performed during an event.	NUREG-0654, Revision 2, formatting eliminates the description of the 'normal' organization to focus on the requirements for organization response to activation of the Plan as described in Section C.
117	The Operations Group SHALL have responsibility for: 1. Plant Operations and assessment of operational aspects of the emergency. 2. Short term damage control and repair for electrical, mechanical, and I&C equipment.	**Section B.1.a** The requirements for on-shift operations staff, security force staff, fire brigade and first aid staff are controlled by site-specific Technical Specifications and other site-specific licensing and administrative documents. Positions from these departments are contained in the emergency plan only when assigned an EP function that is performed during an event.	NUREG-0654, Revision 2, formatting eliminates the description of the 'normal' organization to focus on the requirements for organization response to activation of the Plan as described in Section C.
118	**B. Security Group**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
119	The Security Group consists of the Security Manager, the Security Staff, and the contract Security Force.	**Section B.1.a** Shift Emergency Communicator • Notify the ERO as needed • Communicate required information per element E.3 to Offsite Response Organizations (ORO) until relieved	Language has been standardized between the three current plans and aligned to format. Detailed staffing analysis is contained in Enclosure 1 Section B of this submittal.
120	The Security Force SHALL: 1. Carry out the plant security and Access Control program. 2. Maintain strict personnel accountability onsite. 3. Assist communications efforts when necessary. 4. Assist in first aid treatment.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of site functions controlled by other plant requirements, in this case the Security Plan to focus on EP functions.
121	**C. Shift Manager**		
122	The Shift Manager (SM) SHALL be onsite continuously. The Shift Manager SHALL assume overall coordination and control in the Control Room and provide direction as necessary to the Shift Supervisor.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Provide overall ERO command and control until relieved.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
123	The Shift Manager SHALL: 1. Assume the duties of the Emergency Director until relieved by the TSC Emergency Director. Portions of the E-Plan implementation may be delegated to other members of the plant staff as the condition of the plant dictate. 2. Assess the emergency condition, event evaluation, and safety related aspects of the plant.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Evaluate plant conditions and approve Emergency Action Level (EAL) classifications until relieved. • Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs until relieved.	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
124	**D. Shift Technical Advisors**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
125	Provide technical and engineering support in the area of accident assessment.	**Section B.1.a** Senior Reactor Operator (SRO)/Shift Technical Advisor (STA) • Evaluate reactor conditions and assess for core damage • Evaluate plant conditions and recommend EAL classification until relieved	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
126	**E. Shift Emergency Communicator (SEC)**		
127	The Shift Emergency Communicator (SEC) SHALL be onsite continuously. The SEC is responsible for initial notification to the offsite agencies and maintaining communications during emergency conditions.	**Section B.1.a** Shift Emergency Communicator • Notify the ERO as needed • Communicate required information per element E.3 to Offsite Response Organizations (ORO) until relieved	Language has been standardized between the three current plans and aligned to format. Detailed staffing analysis is contained in Enclosure 1 Section B of this submittal.
128	The SEC may designate offsite communications to a qualified Communicator.	No equivalent statement	Standard Plan provides for communicators and augmented communication support consistent with the staffing outlined in NUREG-0654, Revision 2.
129	**F. Fire Brigade**		
130	The Fire Brigade should consist of: 1. Brigade Chief - Unit 1 Turbine Building APEO or as designated by the Shift Manager. 2. Assistant Chief - Any Qualified APEO. 3. Fire Fighters - BOP Operators. 4. Runner - As designated to accompany fire department, operate equipment, bring additional equipment to fire scene.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of site functions controlled by other plant requirements, in this case the Fire Protection Plan to focus on EP functions.
131	The Fire Brigade SHALL be responsible for firefighting and primary responders for Search and Rescue, as necessary.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of site functions controlled by other plant requirements, in this case the Fire Protection Plan to focus on EP functions.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
132	The Red Wing Fire Department should provide emergency assistance and SHALL be called immediately on report of fire. Other plant personnel on site may be called on for emergency work or called to plant for emergency service.	**Prairie Island Annex, Section 4.a** Letters of Agreement	Specific description of support services including Hostile Action Based support is included in the Site-Specific Letters of Agreement.
133	**G. Radiation Protection Specialist**		
134	The Radiation Protection Organization consists of two Radiation Protection Specialists (RPS) onsite at all times. The RPS is responsible for conducting routine and special surveys, maintaining Access Control, writing RWP's and providing job coverage as required.	**Section B.1.a,** RP Technicians • Provide RP coverage for responders accessing potentially unknown radiological environments. • Provide in-plant surveys. • Control dosimetry and radiologically controlled area (RCA) access • Perform dose assessments and provide input regarding PARs to the SM/ED until relieved **Table B-1 Minimum On-Shift and Augmented Staffing**	The Standard Plan formatting revises staffing requirements into Table B-1. Performance of on-shift dose assessment has been added to this position. The shift staffing analysis demonstrated that the addition of this task did not result in conflict of duties.
135	**H. Chemistry Technician**		
136	One Chemistry Technician is onsite at all times. The Chemistry Technician is responsible for chemistry, radiochemistry, dose assessments, and offsite dose projections. The Chemistry Technician is also cross-trained to support the Radiation Protection Specialist functions described in Section G above.	No equivalent statement	Chemistry function is no longer included in NUREG-0654, Revision 2, as an EP function resulting in the deletion of this section.
137	**5.3.4 Plant Emergency Staff Augmentation Groups**		
138	**A. Maintenance Group**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
139	The Maintenance Group consists of all mechanical maintenance personnel, all plant electricians and I&C Specialists. The onsite Emergency Organization includes the Maintenance Manager, who should report to the Technical Support Center (TSC); and the Maintenance Supervisors (mechanical, electrical and I&C), and designated Electricians who should report to the Operational Support Center (OSC). The mechanical, electrical and I&C maintenance staff in the OSC can be further augmented or decreased as emergency conditions dictate.	**Section B.1.a** Maintenance Coordinator • Supporting the repair and corrective actions • Supporting Search and Rescue efforts	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
140	The Mechanical, Electrical, and I&C Maintenance Group SHALL have responsibility for: 1. Supporting the repair and corrective actions for the mechanical, electrical, and I&C systems in support of emergency response and recovery actions. 2. Supporting the Search and Rescue effort.	**Section B.1.a** Maintenance Coordinator • Supporting the repair and corrective actions • Supporting Search and Rescue efforts	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
141	**B. Radiation Protection Group and Chemistry Group**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
142	The Radiation Protection and Chemistry Groups consists of the Radiation Protection Manager & Chemistry Manager and all members of the Radiation Protection and Chemistry Groups. Radiation Protection and Chemistry Managers and other designated group members should report to the Technical Support Center. Other Radiation Protection Specialists and Chemistry Technicians should report to the Operational Support Center.	**Section B.1.a** Technical Support Center (TSC) Radiological Assessment Coordinator • Develop and recommend PARs • Communicate changes to plant radiological conditions • Provide oversight for facility habitability surveys **Section B.1.a** Dose Projection Specialist • Perform dose assessment	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
143	The responsibilities of the Radiation Protection and Chemistry Groups are: 1. Offsite Dose Assessment 2. Offsite Surveys 3. Onsite Surveys 4. Chemistry 5. Radiochemistry 6. Radiation Protection for: A Access Control B Damage control and repair C Search and rescue D First aid E Fire fighting F Personnel monitoring and decontamination G Dosimetry	**Section B.1.a** Technical Support Center (TSC) Radiological Assessment Coordinator • Develop and recommend PARs • Communicate changes to plant radiological conditions • Provide oversight for facility habitability surveys RP Coordinator • Provide oversite for OSC activities related to radiological surveys and monitoring of radiological conditions in the plant **Section B.1.a** Dose Projection Specialist • Perform dose assessment	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
144	**C. Engineering Group**		
145	The Engineering Group consists of Systems, Programs, Design and Equipment Reliability.	No equivalent statement	The Standard Plan provides for individual areas of responsibility consistent with the guidance of NUREG-0654, Revision 2, without generalizing group responsibilities.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
146	Upon activation of the onsite emergency organization, Systems and Programs Engineering Managers and designated engineers assigned to the emergency organization should report to the Technical Support Center. Other designated engineers may be requested to further augment engineering support in the TSC.	**Section B.1.a** Core Thermal Engineer • Core damage assessment Mechanical Engineer • Provide engineering support and troubleshooting for mechanical systems Electrical Engineer • Provide engineering support and troubleshooting for electrical systems	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
147	The Engineering Group SHALL have responsibility for: 1. Providing technical support for plant system engineering on electrical/mechanical systems. 2. Providing technical support for operating radioactive waste control systems. 3. Providing core parameter analysis to determine current core status. 4. Providing plant parameter trending and analysis utilizing the Emergency Response Computer System (ERCS). 5. Projecting possible loss of key equipment and its consequences. 6. Providing technical support for emergency repairs and corrective actions on electrical/mechanical systems. 7. Update TSC staff of potential problems and developments.	**Section B.1.a** Core Thermal Engineer • Core damage assessment Mechanical Engineer • Provide engineering support and troubleshooting for mechanical systems Electrical Engineer • Provide engineering support and troubleshooting for mechanical systems	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
148	**D. Logistics Support Group**		
149	The Logistics Support Group consists of Business Support Group (Administration Services and Document Control), Plant Services, and Site Materials.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
150	Business Support Group SHALL supply logistical support in their area of expertise. Personnel in these areas may be called in to provide support for emergency response on an "as needed" basis.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
151	Site Materials SHALL provide assistance in retrieving the parts necessary for an emergency response.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
152	Plant Services SHALL support an emergency response by providing necessary assistance by the Nuclear Plant Service Attendants.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
153	**5.4 EOF Organization**		
154	The EOF (Emergency Operations Facility) Organization consists of a Direction and Control Group and three subordinate groups. The EOF Organization is staffed by personnel from the site's Engineering and Project Management groups and Prairie Island Training Center staff. The Prairie Island EOF Organization is shown in Figure 2.	**Section B.1 starting on p. 16 contains the EOF Organization.** Figures B-3 (EOF) and B-4 (JIC) contain specific organizations and staffing timeliness requirements.	Corporate Plan previously controlled EOF organization. Incorporation of the standard Plan brings the previous organization into the Standard Plan. See Enclosure 1 Section B for detailed staffing justification.
155	The EOF will be activated within 90 minutes of when an Alert, Site Area Emergency or General Emergency is declared.	**Section H.3** The EOF is required to be activated within 90 minutes following the declaration of an Alert or higher classification.	No change
156	**5.4.1 EOF Direction and Control**		
157	The Emergency Manager is responsible for overall direction and control of NSPM's emergency response effort. Designated members of management staff the Emergency Manager position in the EOF.	**Section B.1.a** Emergency Manager • Provide overall event response and control • Approve notifications to state/local offsite agencies • Approve PARs	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
158	Specific personnel assignments to the Emergency Manager position are found in the MT & PI Nuclear Emergency Preparedness Telephone Directory.	No equivalent statement	Qualifications are maintained as part of the Training Program and ERO notification criteria defined in other areas of the Standard Plan.
159	The Emergency Manager relieves the Emergency Director of the following responsibilities: A. Off-site dose projections and coordination and direction of the utility off-site radiological monitoring teams. B. Authorization of offsite Protective Action Recommendations. C. Communications with off-site authorities including Federal, State, Local and Tribal authorities and MT & PI Offsite executive management located at the Minnesota State Emergency Operations Center.	**Section B.1.a** Emergency Manager • Provide overall event response and control • Approve notifications to state/local offsite agencies • Approve PARs	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
160	**Figure 2 Prairie Island EOF Organization (Chart)**	**Section B.1 starting on pg. 16 contains the EOF Organization.** Figures B-3 (EOF) contain specific organizations and staffing timeliness requirements.	Corporate Plan previously controlled EOF organization. Incorporation of the standard Plan brings the previous organization into the Standard Plan. See Enclosure 1 Section B for detailed staffing justification.
161	Other responsibilities of the Emergency Manager include: A. Coordinate the emergency response efforts of other offsite support personnel assisting the plant organization. B. Obtain and coordinate the services of outside consultants and vendors. C. Advise utility management on matters related to emergency response efforts and needed resources to support the effort.	**Section B.1.a** Emergency Manager • Provide overall event response and control • Approve notifications to state/local offsite agencies • Approve PARs	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
162	**5.4.2 EOF Technical Support Group**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
163	The EOF Technical Support Group consists of select personnel from the site's Engineering and Project Management groups and Training Center staff. The Technical Support Supervisor is staffed by senior personnel and reports to the Emergency Manager. The Technical Support Group is responsible for trending critical parameters, engineering evaluation in support of the TSC Engineering Group, technical assessment and advising the Emergency Manager on technical matters related to the event.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
164	**5.4.3 EOF Radiation Protection Support Group**		
165	The EOF Radiation Protection Support Group is staffed by select personnel from the Training Center, plant Radiation Protection and Chemistry Groups and Emergency Plan Group. The Radiation Protection Support Supervisor position is staffed by senior personnel qualified in radiation assessment and reports to the Emergency Manager. The Radiation Protection Support Group includes plant Chemistry personnel for off-site dose projection and EOF Count Room operation and Nuclear Plant Service Attendants who function as sample couriers and drivers for off-site radiological monitoring teams. Radiation Protection Support Group responsibilities include:	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
166	A. Direction and coordination of the utility off-site radiological monitoring teams. B. Off-site dose projection. C. EOF Count Room activation and operation. D. EOF habitability, personnel monitoring and decontamination (as necessary). E. Communications with state assessment groups on matters related to dose projections and off-site protective action recommendations. F. Staffing the Health Physics Network (HPN) and communications with the NRC (as necessary).	**Section B.1.a** **Figure B-4, EOF Organization** Emergency Operations Facility (EOF) Radiological Assessment Coordinator (RAC) • Assess and communicate offsite radiological conditions • Provide oversite for dose assessments and projections • Develop and recommend PARs	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
167	The Radiation Protection Support Supervisor advises the Emergency Manager on matters related to actual or potential radiological impact on the environment, off-site protective action recommendations, and EOF habitability.	**Section B.1.a** **Figure B-4, EOF Organization** Emergency Operations Facility (EOF) Radiological Assessment Coordinator (RAC) • Assess and communicate offsite radiological conditions • Provide oversite for dose assessments and projections • Develop and recommend PARs	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
168	**5.4.4 EOF General Support Staff**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
169	The EOF General Support Staff consists of the EOF Coordinator, emergency communicators, administrative and security support personnel. The EOF Coordinator position is staffed by senior Training Center or site Engineering and Project Management personnel and reports to the Emergency Manager. The EOF Coordinator is responsible for activation and operation of the EOF and assists the Emergency Manager with administrative duties.	No equivalent statement	Administrative function to be maintained in EPIPs.
170	The emergency communicators, EOF Security Coordinator and Administrative Staff report to the EOF Coordinator. The emergency communicators are responsible for communications with offsite agencies as directed by the Emergency Manager. The Administrative Staff is responsible for emergency document control, recording and document distribution at the EOF. An EOF Coordinator Assistant is responsible for general logistics support and assisting the EOF Coordinator. The EOF Security Coordinator reports to the EOF Coordinator.	No equivalent statement	Administrative function to be maintained in EPIPs.
171	Responsibilities of EOF Security include EOF access and dosimetry issuance to EOF personnel.	**Section B.1.a** Security Coordinator • Coordinate security response with Local Law Enforcement and Federal officials • Provide oversite for the Offsite Communicator	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
172	**5.5 Recovery Organization**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
173	The establishment of the Recovery Organization will be dependent upon the nature and severity of the event or plant conditions. In general terms, an Unusual Event or Alert may be terminated without establishing a special Recovery Organization while a Site Area Emergency or General Emergency will probably necessitate the establishment of a Recovery Organization. The Recovery Organization will manage the overall recovery or post-accident outage plans as work is done to return the plant to a normal operational or shutdown status.	**Section M.3** Implementing procedures provide guidance to directly terminate from an Unusual Event, Alert or Site Area Emergency with no long-term plant damage classifications when a normal outage organization is able to address any plant issues, or to transition to a recovery organization.	Section M Recovery and Reentry Planning and Post accident Operations directs post emergency phase. Statement is not relevant to activities in the Emergency Phase.
174	The Recovery Manager is mainly responsible for management of the recovery phase and will perform their initial tasks as directed by the Emergency Manager. The Recovery Manager will report to the Emergency Operations Facility and begin to prepare for the transition to Recovery, as necessary. If Recovery is imminent, the Recovery Manager will establish a recovery or post-accident outage organization following the site's plant event recovery protocols.	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization **Figure M.2-1**	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-065, Revision 2. without change in practice or intent from the current approved Plan.
175	**5.6 Augmentation of Plant and EOF Emergency Organizations**		
176	**5.6.1 Offsite Support Response**		
177	The emergency response plan for Prairie Island NGP is designed to be initially implemented independent of any offsite support. However, the onsite effort will be augmented with offsite support resources as described in the MT & PI Offsite Nuclear Emergency Plan.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal. Standard Plan maintains the commitment to interact with the OROs responding to the event.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
178	It is the purpose of the offsite support organization to augment the onsite response effort with offsite support resources as soon as practical and as needed by the Prairie Island Site staff. Such areas of support include: Government Agency Interface, Logistics Support, News Media Interface and Utility Executive Management Interface.	No equivalent statement	Section B of the Plan maintains the ERO description and purposes. A detailed Staffing justification is provided in Enclosure 1 Section B of this submittal.
179	**5.6.2 Monticello Radiation Protection Group Support**		
180	The Monticello Nuclear Generating Plant is located approximately 100 miles northwest of Prairie Island NGP. The Monticello Radiation Protection and Chemistry Groups are available for supporting the Prairie Island Radiation Protection Group with personnel and equipment during any emergency condition at Prairie Island.	No equivalent statement	Integration of the existing site Plans and the Corporate Plan into a single response Plan eliminates the need to call out Monticello as a supporting organization.
181	**5.6.3 Westinghouse Support**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
182	Westinghouse emergency assistance is available on a twenty-four hour per day, seven day per week basis. Westinghouse will activate all appropriate features of the Westinghouse Emergency Response Plan to support the plant needs. When activated, the Westinghouse Emergency Response Plan becomes a functioning organization, comprised of individuals with unique technical, managerial and communication skills and experience, necessary to: A. Make an early assessment of the situation. B. Provide early assistance to the utility. C. Mobilize appropriate Westinghouse critical skills and functions. D. Initiate timely, accurate communications to involved and interested parties.	**Section B.5** Vendors and Contractors Major equipment providers or Architect-Engineers include Westinghouse Electric Corporation and General Electric Corporation, which can provide the following assistance in an emergency: • Trained personnel. • Technical analysis. • Operational analysis. • Accident and transient analysis.	Language standardized between the three plans without change in practice or intent.
183	A Site Response Team may be dispatched to the site to obtain a first hand assessment of actual conditions and establish communications from the site to the Westinghouse response center, as deemed necessary.	**Section B.5** Vendors and Contractors Major equipment providers or Architect-Engineers include Westinghouse Electric Corporation and General Electric Corporation, which can provide the following assistance in an emergency: • Trained personnel. • Technical analysis. • Operational analysis. • Accident and transient analysis.	Language standardized between the three plans without change in practice or intent.
184	**5.6.4 Local Support Services**		
185	**A. Fire Fighting**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
186	The Red Wing Fire Department will provide assistance in the event of a fire occurring at the plant. The duties and responsibilities of the Plant Fire Brigade, insuring complete coordination with the Fire Department, are covered in the Operations Manual, Section F5, Fire Fighting.	**PI Annex, Section A.4** Site-specific letters of agreement (LOAs) or memorandums of understanding (MOUs), are maintained by PINGP with the following organizations: • State of Wisconsin • Goodhue County Emergency Management • Dakota County Emergency Services • Pierce County Emergency Services • City of Red Wing • Mayo Clinic – Red Wing	Specific description of support services including Hostile Action Based support is included in the Site-Specific Letters of Agreement.
187	The Red Wing Fire Department will be the lead fire and Emergency Medical Service (EMS) agency for all emergencies. The Red Wing Fire Department maintains mutual aid agreements with other area ambulance and fire departments as specified in the City of Red Wing/Goodhue County Emergency Response Plan. These agreements provide that the City may call upon other resources to assist in responding to an emergency, including a Hostile Action Based (HAB) event. For a HAB event, Red Wing Fire Department will deploy a representative to the Incident Command Post dependent upon type, location, and scope of the incident, once scene safety is established.	**PI Annex, Section A.4** Site-specific letters of agreement (LOAs) or memorandums of understanding (MOUs), are maintained by PINGP with the following organizations: • State of Wisconsin • Goodhue County Emergency Management • Dakota County Emergency Services • Pierce County Emergency Services • City of Red Wing • Mayo Clinic – Red Wing	Specific description of support services including Hostile Action Based support is included in the Site-Specific Letters of Agreement.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
188	The Red Wing Fire Department has various firefighting apparatus and water pumping equipment available for use. All Red Wing Fire Department apparatus can perform both fire fighting tasks, including rescue, and non-fire fighting tasks, including spraying to contain radiological releases and pumping water into the plant for refilling and cooling purposes. In all cases, such operations can begin once the radiological and security threats are mitigated to insure the safety of both plant personnel and fire fighters.	**PI Annex, Section A.4** Site-specific letters of agreement (LOAs) or memorandums of understanding (MOUs), are maintained by PINGP with the following organizations: • State of Wisconsin • Goodhue County Emergency Management • Dakota County Emergency Services • Pierce County Emergency Services • City of Red Wing • Mayo Clinic – Red Wing	Specific description of support services including Hostile Action Based support is included in the Site-Specific Letters of Agreement.
189	**B. Hospital and Medical Support**		
190	Medical support and treatment for non-radiological injuries is provided by the Mayo Clinic Health System, both of which are located in Red Wing, Minnesota. Radiological related injuries are treated at the medical center which is the primary treatment facility. Emergency plans have been prepared, and training of medical center personnel is accomplished on an annual basis.	**PI Annex, Section A.4** Site-specific letters of agreement (LOAs) or memorandums of understanding (MOUs), are maintained by PINGP with the following organizations: • State of Wisconsin • Goodhue County Emergency Management • Dakota County Emergency Services • Pierce County Emergency Services • City of Red Wing • Mayo Clinic – Red Wing	Specific description of support services including Hostile Action Based support is included in the Site-Specific Letters of Agreement.
191	Regions Hospital in St. Paul, Minnesota is designated as the definitive care center for Prairie Island Nuclear Generating Plant. Regions Hospital may be used for radiation casualties, severe burn casualties, and other non-radiation injuries with use of an appropriate medical air transport service.	**Section C.2** These agreements identify the emergency measures to be provided, the mutually accepted criteria for implementation, and the arrangements for the exchange of information. LOAs common to both sites include; • Regions Hospital	Language standardized between the three plans without change in practice or intent.
192	**C. Ambulance Service**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
193	The Red Wing Ambulance Service will provide service to the Prairie Island Nuclear Generating Plant. Training and participation in drills ensures that personnel involved in the transportation of radiation victims are knowledgeable in use of proper procedures and handling methods. Procedures are covered in the Operations Manual, Section F4, Medical Support and Casualty Care.	**PI Annex, Section A.4** Site-specific letters of agreement (LOAs) or memorandums of understanding (MOUs), are maintained by PINGP with the following organizations: • State of Wisconsin • Goodhue County Emergency Management • Dakota County Emergency Services • Pierce County Emergency Services • City of Red Wing Mayo Clinic – Red Wing	Specific description of support services including Hostile Action Based support is included in the Site-Specific Letters of Agreement.
194	**D. Local Law Enforcement**		
195	For a Notification of Unusual Event (NUE) Security Condition and an Alert and Site Area Emergency Hostile Action Based (HAB) event at PINGP, the City of Red Wing Police Department is the lead law enforcement agency. For a HAB event, the Red Wing Police Department will set up an Incident Command Post (ICP) near the site. The pre-designated ICP locations have been identified; however, selection will depend on the incident. The City of Red Wing Police Department maintains the list of potential ICP sites and will be responsible for designating the site during a response and telling the other agencies responding to the location	No equivalent statement	NUREG-0654, Revision ,2 formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
196	Unified Command should be established and includes city, county, state, federal and utility expertise. Communication will be established between the Incident Commander and plant security and operations as soon as possible.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
197	The Red Wing Police Department has the ability to request additional response resources from neighboring agencies (i.e., the primary source of additional resources will be the Goodhue County Sheriff's Office with the ability to request assistance from other neighboring agencies as necessary) to assist them in response to any Prairie Island contingency situation, including a HAB event.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
198	The initial hostile action response goals are; maintain vital plant systems to prevent a release of radioactive materials, protection of on-site workforce, neutralizing the adversaries, and restoring plant operating conditions. Tactical operational priorities supported by Law Enforcement include; securing a perimeter around the site, containment of vital areas, sweep and securing of vital areas, safe movement of critical workers on the site, neutralizing adversaries, protection/evacuation of the on-site workforce, and sweep of protected area and owner controlled area.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
199	The Incident Command Post will support tracking resources and personnel at or near the site and the City of Red Wing/Goodhue County Emergency Operation Center (EOC) will support tracking resources and personnel off-site in accordance with the Radiological Emergency Plan.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
200	In the event that NSPM has declared a General Emergency as defined in the City/County Plan, the Goodhue County Sheriff's Office shall assume operational control over all emergency operations.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
201	**5.7 Coordination with Governmental Response Organizations**		
202	**5.7.1 Minnesota Division of Homeland Security and Emergency Management (HSEM)**		
203	The Minnesota Division of Homeland Security and Emergency Management has the responsibility for notification and coordination of Minnesota State Agencies in the event of a major emergency at Prairie Island.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
204	The MN HSEM is notified by Prairie Island NGP. In the event of an emergency situation at the plant, the MN duty officer will immediately call the MN Department of Health, the Governor's Authorized Representative and other state agencies with emergency assignments to coordinate the implementation of any emergency procedures. The state agencies responsible for emergency procedures have established a system of twenty-four hour communications.	**PI Annex, Table F.1.b, PINGP Communications Matrix,** **PI Annex, Section E.2** The Minnesota Division of Homeland Security and Emergency Management (HSEM) is responsible for coordinating the recommendation and making it a decision with appropriate approvals from Pierce, Goodhue and Dakota Counties and the Wisconsin Emergency Management and assigning siren activation times and EAS activation times. The Dakota, Goodhue and Pierce County Sheriff's Offices are responsible for activation of the outdoor warning sirens.	Standard Plan in the Table describes the systems available to the various ERFs and not specifics on how they operate.
205	**5.7.2 Minnesota Department of Health (MDH)**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
206	The Minnesota Department of Health (MDH) is responsible for providing radiological expertise in the State Emergency Operations Center in conjunction with the MN HSEM.	**Section A.1.a** The Minnesota Department of Health (MDH) is responsible for providing radiological expertise in the State Emergency Operations Center in conjunction with the Department of Public Safety.	No change
207	The Minnesota Department of Health will interpret data and participate in recommending protective actions to the Governor's Authorized Representative.	**Section A.1.a** The Minnesota Department of Health will interpret data and participate in recommending protective actions to the Governor's Authorized Representative.	No change
208	**5.7.3 Wisconsin Emergency Management**		
209	The Wisconsin Emergency Management (WEM), has the responsibility for notification and coordination of Wisconsin state agencies in the event of a major emergency at Prairie Island NGP.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
210	In the event of an emergency situation at the plant, Prairie Island NGP will notify the WEM duty officer who will notify the Wisconsin Department of Health Services (Radiation Protection Section) and other state agencies with emergency assignments, to coordinate the implementation of any emergency procedures. The state agencies responsible for emergency procedures have established a system of twenty-four hour communications.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
211	**5.7.4 Wisconsin Department of Health Services (DHS)**		
212	The Wisconsin Department of Health Services (DHS) is responsible to prevent exposure to ionizing radiation in amounts which are detrimental to health according to nationally accepted standards.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
213	The Wisconsin DHS, Radiation Protection Section, is responsible for coordination of radiation response activities in the State of Wisconsin. In the event of an emergency at Prairie Island NGP, DHS, Radiation Protection Section will be concerned with monitoring the air and water about the plant to assure that the public is not exposed to levels of radioactive pollutants potentially detrimental to public health. DHS's facilities are located in Madison, Wisconsin.	No equivalent statement	NUREG-0654, Revision 2, NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
214	**5.7.5 Goodhue, Dakota and Pierce County Sheriffs**		
215	The Sheriff's Departments will notify all necessary local emergency response groups in the event of an accident. The Sheriff is responsible for protection of the general public and can provide personnel and equipment for evacuation, relocation and isolation.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
216	Goodhue County and the Sheriff also has agreements in place to request additional response resources from neighboring agencies, including resources needed to respond to a HAB event. For a HAB event, the Red Wing Police Department will set up an Incident Command Post (ICP) near the site.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
217	The Goodhue County Sheriff's Office Tactical Response Team will be the lead tactical response operations group coordinator and coordinate the tactical law enforcement response with Command. Goodhue County Sheriff's Office can request tactical team resources as needed from: Minnesota State Patrol Special Response Team, Dakota County ERT, FBI SWAT and Washington County ERT.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
218	**5.7.6 Goodhue, Dakota, Pierce County and City of Red Wing Emergency Management**		
219	The Goodhue, Dakota, Pierce County and City of Red Wing Emergency Management Organizations have the responsibility for notification and providing direction to residents in the event of a major emergency that affects their respective area of responsibility.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
220	**5.7.7 Prairie Island Indian Community**		
221	The Prairie Island Indian Community has an Emergency Operations Plan that includes the description of tribal responsibilities during a nuclear plant declared event. The Prairie Island Nuclear Generation Plant conducts emergency notifications to the Treasure Island Casino security dispatch center who, in turn, notifies appropriate members of the Prairie Island Indian Community and their organization.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
222	**5.7.8 Minnesota State Patrol**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
223	The Minnesota (MN) State Patrol has the responsibility to protect the general public by providing personnel and equipment to re-route traffic in the event of an emergency situation. Plans have been made for re-routing federal and state highways. Signs and equipment required for re-routing will be stored in the areas where they would be needed to facilitate highway closings. The MN Department of Transportation would be notified by the MN State Patrol to erect the signs.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
224	**5.7.9 Minnesota Department of Transportation**		
225	The MN Department of Transportation will assist the MN State Patrol in blocking and re-routing traffic around the plant site. In addition to the necessary personnel; vehicles, signals, and barriers for setting up and maintaining detour routes are available.	No equivalent statement	State Agencies will function under the auspices of the State Plan and direction of State officials. Statement in the Xcel Energy Emergency Plan is not required.
226	**5.7.10 Canadian Pacific Railway-CP Railway (Soo Line)**		
227	In an emergency situation, CP Rail will make every reasonable effort to expedite unblocking the road/railroad crossing near Prairie Island NGP. The dispatcher will also provide routing assistance during an emergency at Prairie Island NGP.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
228	**5.7.11 Burlington Northern Santa Fe (BNSF) Railway**		
229	The dispatcher will provide routing assistance during an emergency at Prairie Island NGP as per the Minnesota State emergency operations plan.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
230	**5.7.12 Department of the Army, Corps of Engineers, Lock & Dam #3**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
231	The Corps of Engineers at Lock & Dam #3 will be notified by the Minnesota Duty Officer of an emergency at Prairie Island NGP. The Lock and Dam personnel will notify all tows within radio range of impending evacuations and assist in evacuation of personnel at the Lock and Dam.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
232	**NOTE:** A complete description of response capabilities, organizational resources, activation plans, designations of emergency operations centers and letters of agreement are available in Minnesota and Wisconsin's state emergency operations plans.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
233	**5.7.13 Nuclear Regulatory Commission (NRC)**		
234	The basic responsibilities of the NRC are to monitor, assess, and, if necessary, direct the utility to take actions to protect the health and safety of the public. For a radiological incident at a commercial power plant, the NRC is the Lead Federal Agency (LFA). The LFA is responsible for coordinating all Federal on scene actions. The NRC will coordinate Federal assistance to States and local organizations.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
235	State in interpretation and analysis of technical information as a basis for making decisions about protective actions. This assistance will begin early in an incident from the NRC Operations Center in Rockville, MD, and later, from the utility's emergency operations facility on scene. The NRC is an independent reviewer of the actions the utility is taking to correct the initiating and related problems.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
236	The NRC will assess actual or potential offsite impacts as well, and will make an independent evaluation of Protective Action Recommendations, if necessary. As the LFA, the NRC has the responsibility for coordinating the release of Federal information to the media and others.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
237	The NRC will conduct most public information activities from the utility's Joint Information Center (JIC). The NRC also will keep the White House and Congress informed on all aspects of the event.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
238	The NRC is responsible for giving the best possible advice at a given time to the States and will not limit its involvement to presenting a series of options.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
239	The NRC also administers the Price-Anderson Act to ensure that the public that is affected by the event has adequate financial assistance to address most emergency needs.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
240	**5.7.14 Department of Energy (DOE)**		

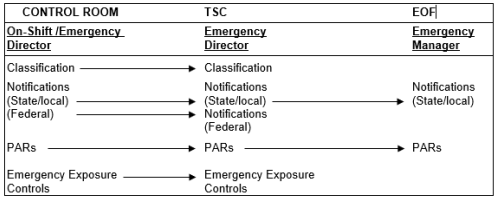
	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
241	Among its responsibilities as a support agency, DOE will coordinate the offsite radiological monitoring and assessment for the Lead Federal Agency (LFA) and the State during the initial phases of the emergency. It will maintain a common set of offsite radiological data and provide an appropriate interpretation of the data to the LFA and the State. DOE will manage the Federal Radiological Monitoring and Assessment Center (FRMAC), which is a multi-agency facility. DOE will conduct environmental monitoring, including air, ground, and water.	**Section A.1.a** Department of Energy (DOE)/Radiation Emergency Assistance Center/Training Site (REAC/TS) Support The DOE provides radiological assistance on request though the REAC/TS and has radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. Following a radiological incident, DOE operates as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP).	The language has been standardized between the three prior plans without change to practice or intent. Statement of function is contained in the more general description of DOE function in the emergency response role
242	Their immediate objective is to rapidly dispatch a Radiological Assistant Program (RAP) Team to the scene to assess the hazard to the public and make recommendations to the authorities for the protection of the public. The Planning Chief in the State EOC is the designated Minnesota authority to request RAP assistance, as stated in the Minnesota state plan, and the Wisconsin DH, Radiation Section, is the designated Wisconsin authority to request RAP assistance for Wisconsin, as stated in the Wisconsin state plan.	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
243	**5.7.15 Institute Of Nuclear Power Operations (INPO)**		
244	INPO will coordinate requests from other utility INPO members and participants.	**Section C.2** LOAs common to both sites include; • Institute of Nuclear Power Operations (INPO)	Language standardized between the three plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
245	They will notify NEI and EPRI of events, maintain an emergency resource capability and information on industry assistance capabilities coordinate the delivery of persons and materials under its Nuclear Power Plant and Transportation Agreements, and provide member communications to facilitate the flow of technical information about the emergency.	**Section C.2** LOAs common to both sites include; • Institute of Nuclear Power Operations (INPO)	Language standardized between the three plans without change in practice or intent.
246	**SECTION 6.0 EMERGENCY MEASURES**		
247	This section will describe the activation of the Emergency Organization. Various detailed and specific emergency measures that will be taken by the plant staff are further delineated in the plant's emergency plan implementing procedures.	No equivalent statement	Introductory Statement. Standard Plan and NUREG-0654, Revision 2, formatting integrate the emergency measures into the specific elements so no equivalent section exists. Justification Matrix will address relocation of specific actions included in the existing section.
248	**6.1 Activation of Emergency Organization**		
249	**6.1.1 Activation of Plant and EOF Organizations**		
250	The Shift Manager will be responsible for activating any part of the emergency organization. During the normal work week, the plant and training center public address systems will be used to activate the organizations. During the off-shift hours, activation of the emergency organizations will be accomplished using the ERO (Emergency Response Organization) Pager Network and the ERO Auto Dial System.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	Language standardized in Plan submittal without change in intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
251	Personal pagers are carried by the following personnel who are considered members of the emergency organization: A. Radiation Survey Team Members B. Plant Operating Review Committee Members C. Maintenance Supervisors (Mechanical and Electrical) D. I&C Supervisors E. Designated Engineers & Technical Personnel	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	Language standardized in Plan submittal without change in intent.
252	The ERO Pager Network is a personal pager system activated by a phone call. Upon receipt of a notification, it will be the responsibility of the supervisors to contact any additional personnel in their respective groups which may be required to report to the plant site, to staff the Technical Support Center, Operational Support Center and Emergency Operations Facility or to initiate offsite monitoring.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	Language standardized in Plan submittal without change in intent.
253	The ERO Auto Dial System is an automatic dialing telephone network with multiple outgoing telephone lines. When activated, it will call and deliver an emergency message to the Plant and EOF Organization's home telephones.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	Language standardized in Plan submittal without change in intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
254	The ERO Auto Dial System and ERO Pager Network are two notification system(s) used to activate the onsite emergency organization. One system is the backup of the other system. Both will be activated for ERO notification. Telephone numbers of all key emergency organization personnel are published in the MT & PI Nuclear Emergency Preparedness Telephone Directory.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	Language standardized in Plan submittal without change in intent.
255	If the event involves a credible security threat, EOF staff may be directed to staff the Backup EOF. In this case, the onsite ERO may be directed to the Red Wing Service Center until it is safe to staff the onsite OSC and TSC. The Red Wing Service Center is to be used as the Alternative Facility during a security threat or event. The RWSC has communication links with the Control Room, EOF, and Security.	**Section H.4** An Alternative Emergency Facility for staging of ERO personnel has been designated for each Xcel Energy site and serves as a location for TSC and OSC personnel should those facilities become uninhabitable or in the cases where the facilities cannot be access such as a hostile action or natural disaster. **PI Annex, Section H.4** The Red Wing Service Center (RWSC) has been designated as the Alternative Facility	Language standardized in Plan submittal without change in intent.
256	**6.1.2 Notification Scheme**		
257	When an abnormal condition is identified by the Operating Staff/Shift Supervisor, the Shift Supervisor will contact the Shift Manager and the Shift Emergency Communicator. An assessment of the safety significance will be performed, and a determination of the emergency classification will be made using the plant's emergency plan implementing procedures.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Evaluate plant conditions and approve Emergency Action Level (EAL) classifications until relieved.	Standard Plan standardized the language between the three plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
258	Upon declaring an emergency condition, the Shift Manager will activate portions of the Emergency Plan as appropriate to respond to the declared emergency. During a Notification of Unusual Event, the Emergency Director position usually will not be staffed and the Shift Manager SHALL designate the Shift Emergency Communicator or other qualified communicator to make the necessary notifications of offsite state and local authorities. The Emergency Director position will be staffed during an Alert, a Site Area Emergency or General Emergency. The Shift Manager will assume the role as Emergency Director until relieved by the individual designated to relieve him.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Provide overall ERO command and control until relieved	Standard Plan standardized the language between the three plans without change in practice or intent.
259	The Shift Manager/Emergency Director, will designate the Emergency Communicator or qualified designee to make notification calls to the following individuals or agencies, as detailed in the plant's implementing procedures.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Direct and approve offsite emergency notifications to state and county authorities until relieved	Standard Plan standardized the language between the three plans without change in practice or intent.
260	A. State of Minnesota HSEM B. State of Wisconsin Emergency Management C. Local Authorities (Wisconsin & Minnesota) 1. Dakota County Sheriff 2. Pierce County Sheriff 3. Goodhue County Sheriff D. Prairie Island Indian Community Representatives via Treasure Island Casino Security Dispatch Center E. Plant Manager (designated Emergency Director) F. Emergency Manager	**PI Annex, Section E.1.a** The site-specific state and county entities are notified of a declared emergency at PINGP are as follows: • Minnesota Division of Homeland Security (HSEM) • State of Wisconsin Emergency Management • Goodhue County Sheriff • Dakota County Sheriff • Pierce County Sheriff • Prairie Island Indian Community - Treasure Island Security Dispatch	Standard Plan standardized the language between the three plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
261	G. Electric Utility System Operations Dispatcher H. NRC Resident Inspectors	Same as above	Standard Plan standardized the language between the three plans without change in practice or intent.
262	A more detailed call list of agencies and individuals, listing phone numbers, is included in the implementing procedures.	No equivalent statement	Standard Plan standardized the language between the three plans without change in practice or intent.
263	The Shift Manager/Emergency Director will ensure that the NRC Duty Officer is notified of the emergency by a qualified individual within one (1) hour of emergency declaration.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Direct and approve offsite emergency notifications to state and county authorities until relieved	Standard Plan standardized the language between the three plans without change in practice or intent.
264	Eventually the Emergency Manager, in the Emergency Operations Facility (EOF), will relieve the Emergency Director of offsite communications and protective action recommendations. At that time offsite notification calls will be initiated by the EOF. The Prairie Island Onsite/Offsite Emergency Organization Interface is shown in Figure 3.		Standard Plan standardized the language between the three plans without change in practice or intent.
265	**6.1.3 Communicators**		
266	It is the responsibility of all individuals in the emergency organization to ensure that any information transmitted or received over any communication channel is formal, clear, and concise so that there will be no misunderstanding.	No equivalent statement	Statement not used. Training function.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
267	Dedicated communicators will be assigned at each emergency operations center assuring a uniform transfer of information between segments of the onsite and offsite emergency response organizations. Initially, this responsibility rests with the Shift Emergency Communicator or qualified designee located in the Technical Support Center and subsequently with all backup communicators assigned these responsibilities.	**Figure B-1, TSC Organization** **Figure B-2, OSC Organization** **Figure B-3, EOF Organization**	Standard Plan provides assignment of communicators to the various ERFs via the tables. There was no change to practice or intent.
268	Emergency Response Facilities such as the Technical Support Center, Operational Support Center, Control Room, Assembly Area and EOF will have dedicated communicators.	**Figure B-1, TSC Organization** **Figure B-2, OSC Organization** **Figure B-3, EOF Organization**	Standard Plan provides assignment of communicators to the various ERFs via the tables. There was no change to practice or intent.
269	Communicators will be assigned to specific communication duties, for example: A. ENS Hotline – licensed operator or designee B. HPN Hotline – Radiation Protection personnel when requested by the NRC following facility activation. C. NRC Security Bridge – Security personnel when requested by the NRC following facility activation. D. Offsite State and Local Agency Notifications – Shift Emergency Communicator and Emergency Communicators	**See Section B.1.a, Figures** **B-1, TSC Organization** **B-2, OSC Organization** **B-3 EOF Organization**	Standard Plan provides assignment of communicators to the various ERFs via the tables. There was no change to practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
270	E. Survey Teams – Radiological Emergency Coordinator or Radiation Protection Support Supervisor and/or designee F. Emergency Operating Centers – Operating Center Coordinators and/or designees G. Others as deemed necessary	**See Section B.1.a, Figures B-1, TSC Organization B-2, OSC Organization B-3 EOF Organization**	Standard Plan provides assignment of environmental teams to the various ERFs via the tables.
271	**Figure 3 Prairie Island Onsite/Offsite Emergency Organization Interface (Chart)**		
272	**Figure 4 HAB Communications (Chart)**	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
273	Primary offsite authorities provide a 24 hour per day manning of communication links, as follows: A. Wisconsin authorities 1. State of Wisc. (WEM) – State Patrol District 1 Dispatcher 2. Pierce County – Pierce County Sheriff's Dispatcher B. Minnesota authorities 1. State of Minnesota – Minnesota Duty Officer (MDO) 2. Goodhue County – Goodhue County Sheriff's Dispatcher 3. Dakota County – Dakota County Sheriff's Dispatcher C. Tribal Authorities – Treasure Island Security Dispatch	No equivalent statement	NUREG-0654, Revision 2, formatting eliminates the description of offsite activities outside the purview of the site emergency plan.
274	**6.1.4 Authentication of Emergency Communications**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
275	Communication, for the purpose of notifying offsite agencies that an emergency condition exists, SHALL be authenticated before offsite agency action is initiated. The authentications will be accomplished in accordance with the offsite agencies specific emergency plans.	**Section E.1.a** Xcel Energy nuclear sites initially notify state and county agencies listed in the site-specific annexes under the following conditions: • The initial ECL declaration • An upgrade to the ECL • The issuance of, or change to, a PAR This notification includes a means of verification or authentication. The authentication is accomplished in accordance with the offsite agency's specific emergency plans.	Standard Plan standardized the language between the three plans without change in practice or intent.
276	**6.2 Record Keeping**		
277	It is the responsibility of all personnel involved in the emergency organization to ensure that accurate and complete records are maintained throughout the emergency situation. Emergency records may serve the following purposes:	No equivalent statement	Procedure level detail. Maintenance of records/logs will be addressed in the EPIPs and Training Program.
278	**6.2.1** Official documentation used to reconstruct the emergency for critique or analysis;	No equivalent statement	Procedure level detail. Maintenance of records/logs will be addressed in the EPIPs and Training Program.
279	**6.2.2** Check to ensure that necessary actions are completed during the course of an emergency;	No equivalent statement	Procedure level detail. Maintenance of records/logs will be addressed in the EPIPs and Training Program.
280	**6.2.3** Information and data collection during an emergency; and	No equivalent statement	Procedure level detail. Maintenance of records/logs will be addressed in the EPIPs and Training Program.
281	**6.2.4** Documentation of actions for legal purposes.	No equivalent statement	Procedure level detail. Maintenance of records/logs will be addressed in the EPIPs and Training Program.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
282	All activities performed by the operations staff SHALL be logged in the applicable reactor log. All other information and activities SHALL be maintained by the Emergency Director, Emergency Manager and various coordinators (e.g., individuals in charge of various emergency operating centers, radiation survey teams, etc.) for permanent plant records.	No equivalent statement	Procedure level detail. Maintenance of records/logs will be addressed in the EPIPs and Training Program.
283	**6.3 Summary of Site Response Actions**		
284	Summarized below are the actions required by the site staff for each of the four emergency classifications. For each class of emergency, appropriate state, local, and tribal authorities will be notified. Depending on the emergency level classification, they will activate the segment(s) of their emergency organizations, according to their individual plans and based on the information received in the notification.	No equivalent statement	Standard Plan and NUREG-0654, Revision 2, formatting provide the response activities for each classification level in the functional area rather than by classification. Justification Matrix will address the activities as located in the standard plan formatting.
285	**NOTIFICATION OF UNUSUAL EVENT** 1. Promptly inform offsite authorities of unusual event status and the reason for the Unusual Event as soon as discovered. 2. Augment on-shift resources as needed. 3. Assess and respond to Unusual Event. 4. Terminate by contacting offsite authorities or 5. Escalate to a more severe class.	**Table D.3-1, Matrix of Emergency Response Measures by ECL**	Standard Plan standardized the language between the three plans without change in practice or intent. Table D.3-1 directs substep actions 1 through 4. Substep 5, escalation is driven by the progression of EALs designed within the approved NEI 99-01 scheme.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
286	**ALERT** 1. Promptly inform offsite authorities of Alert status and reason for Alert as soon as discovered. 2. Augment resources by activating onsite Technical Support Center (TSC) and onsite Operational Support Center (OSC). The Emergency Operations Facility (EOF) and key offsite emergency organization personnel will be activated. 3. Assess and respond to the Alert condition. 4. Dispatch onsite and offsite survey teams and associated communications. 5. Provide periodic plant status updates to offsite authorities. 6. Provide periodic meteorological assessments to offsite authorities and, if any releases are occurring, dose estimates for actual releases. 7. Terminate by contacting offsite authorities. or 8. Escalate to a more severe class.	**Table D.3-1, Matrix of Emergency Response Measures by ECL** **Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures. **Table B-1, Minimum On-Shift and Augmented Staffing** **Section M.3** Implementing procedures provide guidance to directly terminate from an Unusual Event, Alert and Site Area Emergency with no long-term plant damage classifications when a normal outage organization is able to address any plant issues, or to transition to a recovery organization.	Standard Plan standardized the language between the three plans without change in practice or intent. Table D.3-1 directs substeps 1 through 3. Table B-1 directs establishment of the environmental field teams. Standard Plan Section E.1.a directs steps 5 and 6 Standard Plan Section M.3 directs process for termination. Substep 8, escalation is driven by the progression of EALs designed within the approved NEI 99-01 scheme.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
287	**SITE AREA EMERGENCY** 1. Promptly inform offsite authorities of Site Area Emergency status and reason for emergency as soon as discovered. 2. Augment resources by activating onsite Technical Support Center (TSC), onsite Operational Support Center (OSC) and Emergency Operations Facility (EOF). 3. Assess and respond to the Site Area Emergency. 4. If radiological or environmental conditions permit, evacuate onsite, nonessential personnel. 5. Dispatch onsite and offsite survey teams and associated communications. 6. Provide a dedicated individual for plant status updates to offsite authorities. 7. Make senior technical and management staff onsite available for consultation with NRC and State on a periodic basis. 8. Provide meteorological and dose estimates to offsite authorities for actual release via a dedicated individual. 9. Provide release and dose projections based on available plant condition information and foreseeable contingencies. 10. Terminate emergency class by contacting offsite authorities and initiate recovery phase. or 11. Escalate to General Emergency class.	**Table D.3-1, Matrix of Emergency Response Measures by ECL** **Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures. **Section J.1.a** Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager. Transportation offsite includes use of personnel vehicles and company vehicles if needed. **Table B-1, Minimum On-Shift and Augmented Staffing** **Section M.3** Implementing procedures provide guidance to directly terminate from an Unusual Event, Alert and Site Area Emergency with no long-term plant damage classifications when a normal outage organization is able to address any plant issues, or to transition to a recovery organization.	Standard Plan standardized the language between the three plans without change in practice or intent. Table D.3-1 directs substeps 1 through 3. Substep 4; Plan Section J.1. provides direction for site evacuation of non-essential personnel. Table B-1 directs establishment of the environmental field teams. (substep 5) Standard Plan Section E.1.a directs steps 6 through 10. Standard Plan Section M.3 directs process for termination. Substep 8, escalation is driven by the progression of EALs designed within the approved NEI 99-01 scheme.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
288	**GENERAL EMERGENCY** 1. Promptly inform offsite authorities of General Emergency status, appropriate offsite protective action recommendations and reason for emergency as soon as discovered. 2. Augment resources by activating onsite Technical Support Center (TSC), onsite Operational Support Center (OSC) and Emergency Operations Facility (EOF). 3. Assess and respond to General Emergency. 4. If radiological or environmental conditions permit, evacuate onsite, nonessential personnel. 5. Dispatch onsite and offsite survey teams and associated communications. 6. Provide a dedicated individual for plant status updates to offsite authorities. 7. Make senior technical and management staff onsite available for consultation with NRC and State on a periodic basis. 8. Provide meteorological and dose estimates to offsite authorities for actual releases via a dedicated individual. 9. Provide release and dose projections based on available plant condition information and foreseeable contingencies. 10. Terminate emergency class by contacting offsite authorities and initiate recovery phase.	**Table D.3-1, Matrix of Emergency Response Measures by ECL** **Section E.1.a** Initial and follow-up notification message content and the methods used for authentication are mutually developed and agreed upon by Xcel Energy and the offsite authorities. Notification forms, methods and the message authentication technique are provided in implementing procedures. **Section J.1.a** Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager. Transportation offsite includes use of personnel vehicles and company vehicles if needed. **Table B-1, Minimum On-Shift and Augmented Staffing** **Section M.3** Implementing procedures provide guidance to directly terminate from an Unusual Event, Alert and Site Area Emergency with no long-term plant damage classifications when a normal outage organization is able to address any plant issues, or to transition to a recovery organization.	Standard Plan standardized the language between the three plans without change in practice or intent. Table D.3-1 directs substeps 1 through 3. Substep 4; Plan Section J.1. provides direction for site evacuation of non-essential personnel. Table B-1 directs establishment of the environmental field teams. (substep 5) Standard Plan Section E.1.a directs steps 6 through 9. Standard Plan Section M.3 directs process for termination. .
289	**6.4 Assessment Actions**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
290	**6.4.1 Dose Projections**		
291	Dose projections may be performed by using the standard dose projection program RASCAL (Radiological Assessment System for Consequence Analysis). Radioactive effluent release and meteorological data is procured from the Emergency Response Computer System (ERCS) and entered into RASCAL for real time dose assessments during inadvertent release of radioactive materials. The RASCAL program may be run from terminals that are located in the Control Room, TSC, EOF, and Backup EOF.	**Section I.1.b** Xcel Energy uses site-specific versions of the Unified RASCAL Interface (URI) off-site dose projection computer model. The underlying dose assessment model in URI is the NRC RASCAL 4 model, based on the methods and equations documented in NUREG-1940.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
292	Meteorological data is stored and processed in the ERCS. The onsite 60 meter meteorological tower supplies the following: A. Wind speed (10 and 60 meters) B. Wind direction (10 and 60 meters) C. Ambient Temperature D. DT (between 10 and 60 meters) E. Rainfall	**Section H.8** **Meteorological Monitoring** Meteorological information from offsite sources can be obtained from the National Weather Service. Xcel Energy can contact the National Weather Service to obtain additional synoptic scale weather data and compile a site-specific atmospheric diffusion assessment for each Xcel Energy site.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
293	A 22 meter backup meteorological tower is located near the EOF, and supplies the following: A. Wind speed (22 meters) B. Wind direction (22 meters) Redundant instrumentation is provided on the onsite 60 meter meteorological tower, and may be designated as primary and secondary sensors. The 22 meter backup tower provides a set of tertiary sensors	**Section H.8** **Meteorological Monitoring** Meteorological information from offsite sources can be obtained from the National Weather Service. Xcel Energy can contact the National Weather Service to obtain additional synoptic scale weather data and compile a site-specific atmospheric diffusion assessment for each Xcel Energy site.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
294	The ERCS continuously collects the meteorological data. Meteorological data from all three sets of instruments are displayed simultaneously as well as the calculated stability class (derived from the temperature readings). If all met data is unavailable, manual entry of met data may be made for accident calculations.	**Section H.8** **Meteorological Monitoring** Meteorological information from offsite sources can be obtained from the National Weather Service. Xcel Energy can contact the National Weather Service to obtain additional synoptic scale weather data and compile a site-specific atmospheric diffusion assessment for each Xcel Energy site.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
295	Surveillances and quality checks are performed on the meteorological tower equipment and data to ensure emergency responders will have access to representative onsite meteorological data. A daily review of a week's trend of meteorological data is performed. The meteorological tower instruments are functionally tested monthly and calibrated at least annually.	No equivalent statement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
296	Radiological effluent monitor data is also stored and processed in the ERCS. The effluent monitor reading, the calibration conversion factor and the vent flow rate result in a release rate. Effluent concentrations may also be manually entered into the computer if monitor data is not automatically available to the ERCS.	No equivalent statement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
297	With meteorological and effluent release data available, calculations of offsite radiation dose, air concentration, ground deposition, and external dose rate from the plume can be made. Dose calculations are made for Total Effective Dose Equivalents (TEDE) and Thyroid Committed Dose Equivalents (Thyroid CDE). Results of all calculations can be printed in report format and, in most cases, displayed graphically. Isopleths can be displayed of any or all calculated outputs. Projected calculations take into account values of time of release and duration of release. The isopleth displayed is based on the assumption that the release continues for a predetermined duration time. This gives a display in which the plume overlays the region of potential highest dose.	**Section I.1.b** The URI model provides off-site radiological dose and dose rate estimates based on near real time or hypothetical inputs. Projected dose is based on EPA-400 dose conversion factors and provided as; (1) the total effective dose equivalent, or TEDE (the sum of the effective dose equivalent from immersion, 4 days of ground deposition, and the committed effective dose equivalent from inhalation), and (2) the committed dose equivalent to the thyroid (CDE thyroid). URI dose projection results are given for various locations from the site boundary to 10 miles. URI can provide dose assessment results for multiple release points from the site.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
298	The dose assessment computer allows quick accident dose calculations to be made, before any results from the Radiation Survey Teams are received. Radiation Survey Team results will be used to verify the dose calculations.	**Section I.1, I.1.a** The magnitude of a release of radioactive material to the environment is primarily identified directly by effluent monitors. Survey and sample analysis may also be used to determine the magnitude of a release. Indirect means such as core damage estimates and release pathway assumptions may be used to estimate the magnitude of a release of radioactive material.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
299	In case of potential release from the containment, the activity available for a release may be obtained from the containment high range dome monitors, as illustrated in Figure 5. The containment dome monitor reading and applicable calibration curve results in an activity available for release, and using an estimated release rate, an offsite dose calculation within the plume exposure pathway may be projected. The activity available in containment may also be obtained directly from sample analysis.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used
300	The containment dome monitors are also used as indicators for relative amounts of core damage, as illustrated in Figure 5. The indicated radiation levels in the containment gives an estimate of the gaseous radioactive concentrations in containment. Using the time after shutdown and the radiation levels, an estimate of the relative amount of core damage may be made. This must be used in a confirmatory sense, that is, as backup to other measurements of fission product release and other indicators.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used
301	**Figure 5 Containment Dose Rate Versus Time (Chart)**		
302	The capability for remote interrogation of the meteorological data will be provided to NRC by either the Emergency Response Data System (ERDS) or direct telephone access to the individual responsible for making offsite dose projections. Implementing procedures will detail this activity.	**Section H.10** The ERDS will supply the NRC with selected meteorological data points on a near real time basis. The selected ERDS data points are transmitted via Virtual Private Network (VPN) to the NRC at approximately 1-minute intervals.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
303	A hand calculation methodology for offsite dose calculations is available in case of computer system and/or meteorological system failure. Additionally, meteorological data may be obtained from local offsite locations. Atmospheric stability class and weather forecast information is available from the National Weather Service Twin Cities.	No equivalent statement	Computers with URI/Rascal software are provided in each facility where performance of dose assessment may be required. Data can be entered manually if access to plant monitor data or meteorological data is unavailable. The manual entry capability of URI is more effective and faster than a hand calculation.
304	The capability to estimate the total offsite population dose (manrem) received during a release is available. The offsite dose assessment computer will supply the projected dose rates or doses at selected distances from the plant. Radiation Survey Team results may also be used to determine the offsite dose rates. Population distribution charts comprised of the geopolitical subareas are available.	No equivalent statement	NUREG-0654, Revision 2, assigns this responsibility to OROs.
305	The Radiological Emergency Coordinator in the TSC or the Radiological Protection Support Supervisor in the EOF may determine the applicable dose rates in the geopolitical subarea and multiply dose rate times the exposure time, times the population in the geopolitical subarea of interest, thereby calculating an estimated total population dose.	**Section B.1.a** <u>Technical Support Center (TSC)</u> Radiological Assessment Coordinator • Develop and recommend PARs • Communicate changes to plant radiological conditions • Provide oversight for facility habitability surveys **Section B.1.a** <u>Emergency Operations Facility (EOF)</u> • Assess and communicate offsite radiological conditions • Provide oversite for dose assessments and projections Develop and recommend PARs	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
306	The Emergency Director SHALL ensure that radiological information (both actual and potential) and recommendations for protective actions are transmitted to the offsite authorities. Upon activation of the EOF Organization, the responsibility for offsite accident assessment is transferred to the EOF. The EOF will serve as a base of operations for all site environmental surveillance, receipt and analysis of all field monitoring data, offsite dose projection and recommendations for offsite protective actions.	**Section B.1.a** Emergency Director (ED) • Approve EAL classifications • Authorize State/local notifications • Authorize Protective Action Recommendations (PARs) • Authorize personnel dose extensions Emergency Manager • Provide overall event response and control • Approve notifications to state/local offsite agencies • Approve PARs	The Plan standardizes the language between the three existing Plans without change in practice or intent.
307	**6.4.2 Radiological Surveys**		
308	The Radiation Protection Group SHALL be responsible for all radiological surveys and personnel monitoring both onsite and offsite. The Emergency Director has the responsibility for directing all radiation safety during the emergency.	**Section B.1.a** <u>Technical Support Center (TSC)</u> Radiological Assessment Coordinator • Develop and recommend PARs • Communicate changes to plant radiological conditions • Provide oversight for facility habitability surveys Emergency Director • Approve EAL Classifications • Approve notifications to state/local agencies • Approve Protective Action Recommendations (PARs) • Approve personnel dose extensions	The Standard Plan assigns responsibilities to individuals rather than a less specific group.
309	The Radiation Protection Specialists may be divided into two emergency Radiation Survey Teams. The teams are assigned offsite duties such as radiation surveys, air samples, or liquid sampling.	No equivalent statement	Table B-1 provides for specific assignment and timeliness of response for two teams rather than the general guidance specified in the current Plan.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
310	The two offsite survey teams will conduct a search for the plume and obtain dose rates, and iodine, particulate or gaseous samples at pre-designated sample locations. Plume exposure pathway maps with pre-designated sample locations are contained in the emergency survey kits. Additional duties onsite such as radiation surveys, sampling (airborne or liquid) and sample analysis using the equipment available onsite and/or the EOF Count Room facility are completed by other augmented personnel.	**Section B.1.a** Field Monitoring Team (FMT) Monitor • Direct field monitoring teams for collection of dose rates and contamination levels Field Monitoring Team (FMT) • Conduct radiation surveys in areas at or beyond the Site Boundary • Collect environmental samples for future analysis **Table B-1, Minimum On-Shift and Augmented Staffing**	The Plan standardizes the language between the three existing Plans without change in practice or intent.
311	Silver zeolite adsorbers are used to collect airborne iodine samples, both onsite and offsite. Silver zeolite adsorbers eliminate the problem of entrapped noble gases on the iodine adsorber, allowing a much lower detection sensitivity. Iodine samples may be analyzed in the EOF Counting Room.	No equivalent statement	The Standard Plan maintains the commitment to establish teams and perform appropriate sampling without documenting the procedural level specifics of how that sampling is provided.
312	The Radiation Survey Teams are activated via the ERO Auto Dial System and/or the ERO Pager Network or the telephone system. If the emergency occurs during normal working hours, the teams will be activated and respond within 10 minutes. If the emergency occurs during off hours, the first team will be activated and respond within sixty (60) minutes and the second team within ninety (90) minutes.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
313	Designated Emergency Lockers contain emergency survey kits, which include portable instruments, battery operated air samplers, liquid sampling equipment, and communication equipment.	No equivalent statement	The Standard Plan maintains the commitment to establish teams and perform appropriate sampling without documenting the procedural level specifics of how that sampling is provided.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
314	**6.5 Corrective Actions**		
315	Certain actions may be taken by the Prairie Island staff during an emergency which may minimize the severity of the accident and lessen the amount of offsite releases. These actions are outlined in the various standing plant abnormal operating, emergency operating, and plant safety procedures.	No equivalent statement	Corrective Action function is no longer included in NUREG-0654, Revision 2, as an EP function resulting in the deletion of this section.
316	Repair and Damage Control is the responsibility of the Emergency Director and Shift Supervisors. During the onset of the emergency, plant operators are responsible for minor damage repair and control.	No equivalent statement	On-Shift function is no longer included in NUREG-0654, REVISION 2, as an EP function resulting in the deletion of this section.
317	Upon activation of the Plant Emergency Organization, equipment repair activities are the responsibility of the Maintenance Group, the I&C Group, the Electrical Group, and the Operations Group depending upon the extent and type of damage. Repair and damage control on radioactive or contaminated systems will be monitored by the Radiation Protection Group.	**Section B.1.a** Engineering Coordinator • Direct and coordinate engineering resources Core Thermal Engineer • Core damage assessment Mechanical Engineer • Provide engineering support and troubleshooting for mechanical systems Electrical Engineer • Provide engineering support and troubleshooting for electrical systems **Figure B-2, OSC Organization**	Standard Plan assigns responsibility by individual in the TSC and provides Organization Diagram for OSC support for repair activities.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
318	The Fire Brigade is composed of personnel in accordance with NRC requirements and is directed by a Fire Brigade Chief. Backup support is from the Red Wing Fire Department. All onsite Fire Brigade members are trained in the use of onsite fire fighting equipment and in proper fire fighting procedures. The Fire Brigade will be placed in action under the direction of the Brigade Chief.	No equivalent statement	Fire Brigade function is no longer included in NUREG-0654, Revision 2, as an EP function resulting in the deletion of this section.
319	**6.6 Protective Actions**		
320	**6.6.1 Evacuation and Sheltering**		
321	In the course of an emergency at Prairie Island NGP when there is an actual or potential release of radioactive material to the environs in excess of normal operating levels, the Emergency Director SHALL be responsible to ensure that an assessment is made of the projected doses to persons onsite and offsite. Upon activation of the EOF, the Emergency Manager SHALL be responsible for ensuring that all assessments are made of the projected doses to the offsite population.	**Section J.6** Protective actions that can be recommended to the state and counties include the following: • Evacuation. • Shelter in place. • Thyroid blocking agent in accordance with state plans and policy. Additional precautionary PARs for PINGP are included in the site-specific annex. PAR decision-making flowcharts are site-specific in nature and are provided in implementing procedures. Sites have the capability to provide state and local agencies an ad hoc PAR for beyond the 10-mile EPZ.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
322	The Protective Action Guides (PAG's), promulgated by the EPA, set dose guides for the offsite population. The Emergency Director also has the responsibility to ensure that protective actions are also taken to maintain exposure to onsite personnel within the PAG's.	**Section J.5** Onsite protective actions for routine and emergency conditions are detailed in the plant's Radiation Protection Program. During an emergency, protective actions would be taken to minimize radiological exposures or contamination affecting onsite personnel. A range of protective actions appliable to site personnel include: • Assembly/Accountability • Site Evacuation • Issuance of KI	The Plan standardizes the language between the three existing Plans without change in practice or intent.
323	The Emergency Director or the Emergency Manager when the EOF is activated SHALL be responsible to recommend to the state and local authorities any protective actions for the offsite population whether the protective actions be based on predetermined Emergency Action Levels (EALs) or projected offsite dose assessment.	**Section J.6** Protective actions that can be recommended to the state and counties include the following: • Evacuation. • Shelter in place. • Thyroid blocking agent in accordance with state plans and policy. Additional precautionary PARs for PINGP are included in the site-specific annex PAR decision-making flowcharts are site-specific in nature and are provided in implementing procedures. Sites have the capability to provide state and local agencies an ad hoc PAR for beyond the 10-mile EPZ.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
324	Plant Emergency Organization personnel fall into the category of "Emergency Workers" to which higher PAG's apply. The Emergency Director has the responsibility of maintaining doses within these PAG's.	**Section J.5** Onsite protective actions for routine and emergency conditions are detailed in the plant's Radiation Protection Program. During an emergency, protective actions would be taken to minimize radiological exposures or contamination affecting onsite personnel. A range of protective actions appliable to site personnel include: • Assembly/Accountability • Site Evacuation • Issuance of KI	The Plan standardizes the language between the three existing Plans without change in practice or intent.
325	**A. Plant Site**		
326	The primary protective measure for non-essential onsite personnel during a Site Area or General Emergency and possibly during an Alert, is evacuation to a suitable assembly area where the personnel can be monitored for contamination. The Emergency Director or Shift Manager, prior to ordering an evacuation SHALL determine the habitability of the assembly area (wind direction, magnitude of release, etc.).	**Section J.5** Onsite protective actions for routine and emergency conditions are detailed in the plant's Radiation Protection Program. During an emergency, protective actions would be taken to minimize radiological exposures or contamination affecting onsite personnel. A range of protective actions appliable to site personnel include: • Assembly/Accountability • Site Evacuation • Issuance of KI	The Plan standardizes the language between the three existing Plans without change in practice or intent.
327	If the normal onsite assembly area is determined to be uninhabitable, the Emergency Director will select a location farther from the plant site and designate the route to this location.	No equivalent statement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
328	The Control Room operator will sound the evacuation alarm and announce the designated assembly area. If a location offsite is selected, the traffic route and area SHALL be announced.	**Section J.1** Alarms are available for alerting personnel of hazardous conditions such as fire or increasing radiation levels at the site. Site communications methods are available for notification of personnel outside the Protected Area and within the Owner Controlled Area. Instructions are provided to plant personnel that describe the protective action to be taken in each instance	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
329	Once non-essential personnel are accounted for and monitored for contamination, they may be released from the assembly area.	**Section J.5** Onsite protective actions for routine and emergency conditions are detailed in the plant's Radiation Protection Program. During an emergency, protective actions would be taken to minimize radiological exposures or contamination affecting onsite personnel. A range of protective actions appliable to site personnel include: • Assembly/Accountability • Site Evacuation • Issuance of KI	The Plan standardizes the language between the three existing Plans without change in practice or intent.
330	The evacuation routes from the assembly areas are limited to two directions: County 18 to Etter to Hwy 316 or County 18 to Hwy 61. High water conditions may make the Etter route unusable, leaving only the County 18 to Hwy 61 route available. Prairie Island NGP vehicles and personal cars will be used to transport all personnel.	**Section J.1.a** Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager. Transportation offsite includes use of personnel vehicles and company vehicles if needed.	The Plan standardizes the language between the three existing Plans without change in practice or intent. Section J.1.a specifically addresses SAE and GE actions.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
331	If conditions (meteorological or radiological) make land routes unavailable, evacuation by alternate means, (e.g., aircraft or watercraft) may be a viable alternative.	**Section J.1.a** Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager. Transportation offsite includes use of personnel vehicles and company vehicles if needed.	The Plan standardizes the language between the three existing Plans without change in practice or intent. Section J.1.a specifically addresses SAE and GE actions.
332	All non-essential personnel SHALL evacuate to the designated assembly area. The plant security force will assist in the evacuation by directing people to the proper assembly area. The Security Force SHALL direct employees to badge out of the Protected Area while existing the Protected Area. The Security Force will perform an immediate check of the Protected Area to ensure that all personnel did indeed hear the evacuation alarm.	**Section J.1.a** Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager. Transportation offsite includes use of personnel vehicles and company vehicles if needed.	The Plan standardizes the language between the three existing Plans without change in practice or intent. Section J.1.a specifically addresses SAE and GE actions.
333	The Security Force will perform a check of the Owner Controlled Area and warn all personnel of the evacuation in progress.	**Section J.5**Onsite protective actions for routine and emergency conditions are detailed in the plant's Radiation Protection Program. During an emergency, protective actions would be taken to minimize radiological exposures or contamination affecting onsite personnel. A range of protective actions appliable to site personnel include: • Assembly/Accountability • Site Evacuation • Issuance of KI	The Standard Plan retains the commitment to provide Site Evacuation as a protective action for onsite personnel. Procedural level activities required to perform that commitment are relocated to appropriate procedures.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
334	Radiation Survey Team Members, extra on-shift operators, group managers, Maintenance Supervisors, I&C Supervisors, Lead Maintenance Personnel and Station Electricians SHALL report to the Operational Support Center or the Technical Support Center, as applicable. Plant staff without emergency assignments SHALL evacuate to the designated assembly area. NRC Resident Inspector(s) may proceed to the Technical Support Center or Control Room.	**Section J.4** Assembly and accountability is conducted following the declaration of a Site Area or General Emergency, or at the discretion of the Emergency Director and is initiated via site assembly announcement. Accountability of personnel within the Protected Area is accomplished within 30 minutes following emergency declaration and maintained continuously thereafter as described in the Security Plan. Accountability may be delayed during a security event if the Emergency Director, in consultation with Security, determines that performing accountability could be detrimental to the safety of plant personnel. If accountability is delayed, then accountability will be performed as soon as conditions permit.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
335	Designated individuals SHALL complete an accountability check of personnel remaining within the Protected Area by verifying a list of personnel remaining in the Protected Area. The Emergency Director accepts responsibility for solving any discrepancies found during the accountability. The Emergency Director SHALL direct the necessary follow-up actions.	See above	The Standard Plan retains the commitment to provide Assembly/Accountability as a protective action for onsite personnel. Procedural level activities required to perform that commitment are relocated to appropriate procedures.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
336	The Radiation Protection Group or qualified personnel SHALL monitor personnel at the assembly area for contamination, and any exposure determinations SHALL be completed, as conditions warrant. The emergency locker contains material necessary for decontamination of personnel under Radiation Protection Group supervision.	No equivalent statement	The Standard Plan retains the commitment to provide Assembly/Accountability as a protective action for onsite personnel. Procedural level activities required to perform that commitment are relocated to appropriate procedures.
337	The assembly area SHALL remain in contact with the Emergency Director or designee via the telephone system or portable radio supplied in the emergency locker. The individual assigned as the Coordinator at the assembly area will be the contact point for all personnel.	No equivalent statement	The Standard Plan retains the commitment to provide Assembly/Accountability as a protective action for onsite personnel. Procedural level activities required to perform that commitment are relocated to appropriate procedures.
338	The Emergency Director SHALL release non-essential personnel for departure from the site when conditions allow or demand this action. The Emergency Director will designate the proper traffic routes to follow during the departure.	**Section J.1.a** Direction is provided to non-essential site personnel regarding the need to evacuate to either the off-site relocation center or to individual homes as determined by the Emergency Director or Emergency Manager. Transportation offsite includes use of personnel vehicles and company vehicles if needed.	The Plan standardizes the language between the three existing Plans without change in practice or intent. Section J.1.a specifically addresses SAE and GE actions.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
339	Onsite Protective Actions designed for protection of onsite personnel as described above may be inappropriate for a Hostile Action Event. Alternate actions as described in NSIR/DRP-ISG-01 Section IV.F have been developed and proceduralized.	**Section J.5** Onsite protective actions for routine and emergency conditions are detailed in the plant's Radiation Protection Program. During an emergency, protective actions would be taken to minimize radiological exposures or contamination affecting onsite personnel. A range of protective actions appliable to site personnel include: • Assembly/Accountability • Site Evacuation • Issuance of KI	The Plan standardizes the language between the three existing Plans without change in practice or intent.
340	**B. Offsite Areas**		
341	The primary protective actions for the offsite population are sheltering or evacuation. The Emergency Director SHALL recommend the necessary protective actions to offsite authorities based on predetermined protective actions for a General Emergency Classification or results of offsite dose assessment. Upon activation of the EOF, the Emergency Manager SHALL be responsible for recommending protective actions for the offsite population.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Approve Protective Action Recommendations (PARs) until relieved. • Authorize personnel dose extensions until relieved	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
342	If protective actions are warranted prior to augmentation of state emergency response organizations, the Emergency Director SHALL recommend directly to county and tribal authorities the necessary protective actions. In both cases, total responsibility for carrying out the protective actions rests with offsite authorities. Prairie Island NGP SHALL make the recommendations and supply the required dose assessments.	**Section J.9** Applicable plume exposure pathway EPZ PARs are developed at the General Emergency classification level and provided to the ORO personnel responsible for making protective action decisions as noted in element E.1 Prior to ERF activation, the SM/ED is responsible for making these notifications. Following ERF activation, the TSC Emergency Director and subsequently the EOF Emergency Manager assumes the responsibility for PAR notification. PARs are communicated using the initial notification form and process. See section E for a discussion of emergency notification. **Section E.1.b** Xcel Energy nuclear sites notify responsible OROs within fifteen (15) minutes of event declaration. The initial notification to the NRC is made using ENS immediately after notification to the states and counties, and not longer than 60 minutes of event declaration.	The Plan standardizes the language between the three existing Plans without change in practice or intent. Notification Systems used by Xcel Energy notifies county and tribal authorities in same communication process as State authorities.
343	**C. Protective Action Guides (PAG's)**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
344	Table 2 and Table 3 provide guidelines and action levels to be used in the formulation of protective action recommendations for the offsite population and plant personnel.	**Section I.1.b** The URI model provides off-site radiological dose and dose rate estimates based on near real time or hypothetical inputs. Projected dose is based on EPA-400 dose conversion factors and provided as; (1) the total effective dose equivalent, or TEDE (the sum of the effective dose equivalent from immersion, 4 days of ground deposition, and the committed effective dose equivalent from inhalation), and (2) the committed dose equivalent to the thyroid (CDE thyroid).	The Plan standardizes the language between the three existing Plans without change in practice or intent.
345	The specific protective actions carried out by the offsite authorities are contained in their respective emergency plans.	**Section B.1.a** Shift Manager/Emergency Director (SM/ED) • Approve Protective Action Recommendations (PARs) until relieved.	The Standard Plan retains the commitment to provide Protective Action Recommendations based on implementation of the Plan without specifying ORO actions in response to those Protective Actions.
346	**D. Evacuation Time Estimates (ETE) – Plume Exposure EPZ.**		
347	Time estimates for evacuation of the plume exposure EPZ are referenced in an appendix to the Off-site Nuclear Emergency Plan and in the Plant Emergency Plan Implementing Procedure for making off-site protective action recommendations. PINGP and the States of Minnesota and Wisconsin use the ETE to develop pre-determined protective action recommendations.	**Section I, Background** Site-Specific Evacuation Time Estimate (ETE) Studies (EPLAN-06, EPLAN-07) – The ETE study defines the site's Plume Exposure (~10 mile) Emergency Planning Zone (EPZ). It documents the population within defined areas of the zone, evacuation routes and ETEs for different scenarios.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
348	**6.6.2 Use of Protective Equipment and Supplies**		
349	A. Onsite Respiratory Protection and Protective Clothing		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
350	Protective clothing or respiratory protection for onsite personnel SHALL be as designated by the Radiation Protection Group or the Emergency Director.	**H.11.a** Radiation Protection is responsible for the maintenance and storage of radiological equipment and instruments.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
351	Respiratory Protection will be used as necessary to reduce the inhalation of radioactive material. During emergency conditions, it may become impossible to maintain normal respiratory protection guidelines.	**H.11.a** Radiation Protection is responsible for the maintenance and storage of radiological equipment and instruments.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
352	An internal exposure program, whole body counting and/or bioassay program, SHALL be activated to ensure that all internal exposure is determined as assigned to the individual. Respiratory equipment is stored in the OSC and TSC emergency lockers, Unit 1 695□ Turbine Building Chem. Feed Station Area, Fire Brigade equipment room, and Access Control. Access Control is the main storage area for respiratory equipment. The respiratory equipment available is a combination of Self Contained Breathing Apparatus (SCBAs), and full face canister respirators.	**H.11.a** Radiation Protection is responsible for the maintenance and storage of radiological equipment and instruments.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
353	**Table 2 Initial Protective Action Recommendation During a General Emergency (2 pages)**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
354	The following situations require urgent actions by offsite officials. Conditions are based on Control Room indications with no dose projections required. The following protective action recommendations SHALL be made within 15 minutes.	**Section E.1** An accelerated call to the NRC will be made following discovery of an imminent threat or attack against a plant. The accelerated NRC notification will be completed after or concurrent with notification of local law enforcement agencies. The goal will be to initiate the notification within 15 minutes of discovery of an imminent threat or attack against a site. The information provided in the accelerated notification will be limited to the following: • Site name. • ECL if determined prior to the accelerated notification. • Nature of the threat and the attack status	Standard Plan standardized the language between the three plans without change in practice or intent.
355	NOTE: The protective action recommendations described above are based on NRC Response Technical Manual, RTM-96, Vol. 1, Rev. 5, October 2002 and EPA 400-R-92-001, May 1992	**Section J.6** PARs for preventing or minimizing exposure to the public and are based on Environmental Protection Agency (EPA) 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," and NUREG-0654, Revision 1, Supplement 3.	Plan retains the commitment to make a broad range of Protective Action Recommendations consistent with Federal guidance. Statement of actions taken by the OROs is not relevant to implementing the Emergency Plan.
356	**Table 3 Recommended Protective Action to Avoid External and Internal Dose from Exposure to a Gaseous Plume (2 pages)**		
357	**B. Radioprotective Drug**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
358	The use of a stable iodine thyroid blocking agent, Potassium Iodide (KI), for plant staff and personnel assigned to onsite emergency operating centers is recommended in situations where airborne iodine concentrations have or could increase to unacceptable concentrations resulting in thyroid doses greater than 25 Rem (final recommendation by the Food and Drug Administration).	**Section J.7** Site-specific protective action strategies, informed by the site-specific ETEs, have been developed using guidance provided in NUREG-0654, Revision 1. Supplement 3, "Guidance for Protective Action Strategies," in coordination between Xcel Energy and the site-specific Offsite Response Organizations (OROs) and are included in implementing procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
359	The Radiological Emergency Coordinator SHALL recommend the distribution of Potassium Iodide (KI). The Emergency Director SHALL then direct the distribution of Potassium Iodide (KI).	**Section J.5** Each site maintains an inventory of equipment and potassium iodide (KI) available for use by emergency workers. The Emergency Director has the responsibility for approval of issuing KI to site emergency workers.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
360	The Potassium Iodide (KI) tablets are stored in the TSC Emergency Locker, EOF Emergency Locker, and in the Field Survey Kits. The tablets will be distributed per the applicable implementing procedure.	**Section J.5** Each site maintains an inventory of equipment and potassium iodide (KI) available for use by emergency workers. The Emergency Director has the responsibility for approval of issuing KI to site emergency workers.	The Plan standardizes the language between the three existing Plans without change in practice or intent. Location and storage of KI is managed at the procedural level.
361	**C. Shielding**		
362	All plant personnel, who are required to occupy the emergency operating centers, (i.e., Tech Support Center and the Control Room), are protected from intense radiation fields and high airborne radioactivity levels by shielding and/or emergency air handling equipment.	**Section H.1** The TSC provides a location to house personnel who are responsible for management and technical support of plant operations during emergency conditions. The TSC also functions to relieve the on-shift personnel of peripheral duties and communications not directly related to reactor system manipulations and preventing congestion in the MCR.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
363	All reactor coolant system sampling and radiochemical analysis may be completed using the shielded sampling system with reach rods in the hot sample room and a lead brick shielded work area in the hot cell area.	**Section I.4** Source term present in reactor coolant, containment atmosphere, and spent fuel pool area atmosphere are estimated using effluent, process and area radiation monitor readings, comparison of plant conditions against design basis event scenarios, sample analysis and environmental survey results, and plant parameter indications as inputs into the dose assessment and core damage assessment processes.	The Standard Plan maintains the commitment to perform sampling without specifying methodology.
364	**D. Offsite Areas**		
365	There are no plans for the distribution of respiratory protective equipment and/or protective clothing for the general public. The distribution of thyroid blocking agents is the responsibility of the offsite officials. All Protective Actions to be taken for the general public are described in the offsite emergency plans.	No equivalent statement	Responsibility for the actions addressed in this paragraph are assigned to OROs and not controlled under the licensee plan.
366	**6.6.3 Contamination Control Measures**		
367	**A. Onsite Areas**		
368	The Emergency Director SHALL designate the Radiation Protection Group responsible for controlling or minimizing direct or subsequent internal exposure from radioactive materials deposited on the ground or other surfaces.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
369	The Radiation Protection Group SHALL be responsible for determining the extent of contamination in controlled and normally uncontrolled areas. During an emergency, guidelines to follow for contamination limits are shown in Table 4.	**Section K.1.e** Guidelines as established in radiation protection procedures will be used to determine action levels for decontamination. Radiation protection procedures have been established for decontamination of emergency workers and equipment. The means for disposal of contaminated waste are also established.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
370	The Radiation Protection Group with assistance from the Security Force will establish new secondary access control points at the boundaries of the new controlled areas to ensure that all personnel entering the areas are properly badged and clothed.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
371	The Radiation Protection group SHALL advise all personnel that contamination levels in some uncontrolled areas may significantly exceed normal levels. Without protective clothing, personnel will have to take precautions to avoid personal contamination. Limits for personal contamination will remain at the normal limits which will minimize the chance of ingestion of radioactive material.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
372	**Table 4 Contamination Limits**		
373	Particular attention will be given to radioiodine contamination of the skin. Oxidizing agents, e.g., Beta dyne or Radiac Wash, are available in the decontamination kits to treat iodine skin contamination.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
374	The Radiation Protection Group SHALL have the responsibility of controlling all onsite food and water supplies during the emergency. Whenever a plant evacuation takes place involving radiological hazards onsite, all food and water supplies within the evacuation area may be considered contaminated and not for use.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
375	Material decontamination SHALL be performed by the Nuclear Plant Service Attendants or designated personnel under supervision of the Radiation Protection Group. Procedures and equipment for material decontamination are listed in the Decontamination Procedures of the Operations Manual, Sections F-2 and D-13, and in the Radiation Protection Manual RPIP's.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
376	Before any water or food can be consumed, the Radiation Protection Group will check and verify that the food itself and the eating surfaces are below the limits of Section F-2 of the Operations Manual (previously recorded). Random samples of food containers may be analyzed via the GEM Detector for low level contamination not detected by other methods.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
377	During the recovery phase, all areas of the plant will be returned to the original low levels of surface contamination prior to their release for unrestricted entry.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
378	**B. Offsite Areas**		
379	Contamination control in offsite areas is the responsibility of offsite officials with assistance from Prairie Island NGP. Required protective actions are delineated in Protective Actions guides and criteria are listed in the respective state emergency plans.	No equivalent statement	The Standard Plan does not address areas of responsibility assigned to the OROs. The Plan retains the commitment to provide Protective Action Recommendations appropriate to the Emergency Condition.
380	**6.7 Aid to Affected Personnel**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
381	The Emergency Director is responsible for the protection of personnel from exposure to radiation and contamination and arranging for treatment of radiologically induced or contaminated injuries. This responsibility may be delegated to the Radiation Protection Group.	**Section K.1.d** Radiation safety controls are established to contain the spread of loose surface radioactive contamination. Contamination control limits are defined in radiation protection procedures.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
382	**6.7.1 Emergency Personnel Exposure**		
383	The Prairie Island Radiation Protection Group has the necessary equipment and personnel required to provide continuous capability to control and determine radiation exposures of emergency organization personnel. The equipment consists of the following: A. portable radiation detection instruments B. electronic dosimeters C. high and low range dosimeters D. DLR's E. extra high range dosimeters F. record keeping equipment	**Section K.1.e** Guidelines as established in radiation protection procedures will be used to determine action levels for decontamination. Radiation protection procedures have been established for decontamination of emergency workers and equipment. The means for disposal of contaminated waste are also established.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
384	Contractor and vendor representatives may also be present to assist in exposure control and augment the Radiation Protection Group capabilities.	No Equivalent Statement	The Standard Plan focuses on the commitment to provide appropriate Radiation Protection for implementation of the Plan. Long-term contracting for additional support is handled outside the Emergency Phase.
385	In an emergency situation, all onsite personnel, some offsite support personnel and some local governmental emergency response personnel will be issued DLR's and/or SRD's. Exposure records will be maintained for all emergency response personnel issued dosimetry.	**Section K.1.c** Personnel monitoring equipment is issued to and worn by personnel as required in 10 CFR 20 and RP procedures as a record of radiation exposure. Other radiation detection devices are available for use by emergency workers to allow real time measurement of exposure.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
386	During accident situations, higher radiation exposures may be authorized by the Emergency Director in order to protect life and property. The emergency exposure guidelines established are based on the Environmental Protection Agency's "PAGs for Emergency Workers," as listed in Table 3.	**Section K.1.a** The Emergency Director has responsibility for authorizing personnel exposure levels under emergency conditions using the guidance in Environmental Protection Agency (EPA) 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents."	The Plan standardizes the language between the three existing Plans without change in practice or intent.
387	Emergency workers (volunteers) may be allowed to exceed the 10 CFR 20 limits with specific authorization of the Emergency Director when performing activities to protect life and property.	**Section K.2.a** Decisions to accept doses in excess of occupational limits are on a volunteer basis and prospective volunteers shall be made aware of the risks. **Table K.1-a, Emergency Worker Dose Limits**	The Plan standardizes the language between the three existing Plans without change in practice or intent.
388	In certain instances, it may be necessary to exceed 25 Rem exposure during lifesaving operations. All personnel involved SHALL be on a volunteer basis and will be advised of the effects of acute exposures and reasonable considerations of the relative risks.	**Section K.2.a** Decisions to accept doses in excess of occupational limits are on a volunteer basis and prospective volunteers shall be made aware of the risks. **Table K.1-a, Emergency Worker Dose Limits**	The Plan standardizes the language between the three existing Plans without change in practice or intent.
389	**NOTE**: In all circumstances, every effort SHALL be made to keep exposures within the annual limits of 10CFR20 (5 Rem Total Effective Dose Equivalent).	**Section K.1.a** Plant management approval is required before emergency workers are allowed to exceed the maximum administrative radiation dose.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
390	**6.7.2 Decontamination and First Aid**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
391	The Emergency Director SHALL delegate the responsibility for personnel decontamination to the Radiation Protection Group. Decontamination procedures and contamination limits are spelled out in the Radiation Protection Manual RPIP's and the Radiation Safety and Medical Support Sections of the Operations Manual, which SHALL be followed for both normal and emergency situations involving personnel injury and personnel contamination.	**Section K.1.e** Guidelines as established in radiation protection procedures will be used to determine action levels for decontamination. Radiation protection procedures have been established for decontamination of emergency workers and equipment. The means for disposal of contaminated waste are also established.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
392	The primary decontamination facility is located at access control. Two showers and a double sink are located there. Special decontamination solutions are also available at access control.	No Equivalent Statement	The Plan retains the commitment to provide decontamination functions in Section K.1.e without specifying methodologies.
393	When facilities at access control are not available, the assembly area emergency lockers contain equipment for personnel decontamination and personnel monitoring. Supplies include containers for liquid and solid waste. The decontamination kits contain oxidizing agents for decontamination of the skin due to radioiodines.	No Equivalent Statement	The Plan retains the commitment to provide decontamination functions in Section K.1.e without specifying methodologies.
394	Decontamination operations at the assembly area will be confined to minor decontaminations because of limited resources. If necessary, individuals will be furnished with protective clothing and transported to alternate facilities. Contaminated clothing will be disposed of as radioactive waste.	No Equivalent Statement	The Plan retains the commitment to provide decontamination functions in Section K.1.e without specifying methodologies.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
395	The EOF has a decontamination shower with associated liquid retention system. Equipment for small decontaminations is also available along with personnel monitoring equipment.	No Equivalent Statement	The Plan retains the commitment to provide decontamination functions in Section K.1.e without specifying methodologies. In this particular case relocation to a remote EOF eliminates the need for decontamination at that particular facility.
396	Contaminated individuals may be provided whole body counting analysis, as determined by the Radiological Emergency Coordinator. Whole body counting systems are located at PI & MT NGPs and/or mobile units which can be transported on or near the site.	No Equivalent Statement	The Plan retains the commitment to provide decontamination functions in Section K.1.e without specifying methodologies.
397	Emergency First Aid will be applied to all injuries including contaminated injuries since contamination will not be life threatening whereas the lack of first aid could be life threatening.	No equivalent statement	NUREG-0654, Revision 2, removes functions from the E-Plan that are controlled by other site Plans. In this case the Fire Plan directs the activity.
398	First aid kits are located at the primary emergency centers in the plant.	No equivalent statement	NUREG-0654, Revision 2, removes functions from the E-Plan that are controlled by other site Plans. In this case the Fire Plan directs the activity.
399	The First Aid responsibility will be assigned to the Security Officer/EMT when they arrive on the scene. Selected members of the Security Force and plant staff are trained in Advanced First Aid and/or Emergency Medical Training (EMT).	No equivalent statement	NUREG-0654, Revision 2, removes functions from the E-Plan that are controlled by other site Plans. In this case the Fire Plan directs the activity.
400	The skill level of the staff is sufficient until offsite medical personnel arrive or until the victim is transported to the local hospital for further medical treatment.	No equivalent statement	NUREG-0654, Revision 2, removes functions from the E-Plan that are controlled by other site Plans. In this case the Fire Plan directs the activity.
401	The Operations Manual, Section F4, Medical Support and Casualty care, contains specific procedures for first aid situations complicated by contamination.	No equivalent statement	NUREG-0654, Revision 2, removes functions from the E-Plan that are controlled by other site Plans. In this case the Fire Plan directs the activity.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
402	**6.7.3 Medical and Public Health Support**		
403	Medical support and treatment for radiological and non-radiological injuries is provided by the Mayo Clinic Health System located in Red Wing, Minnesota.	**Section L.2.b** Arrangements have been made with local hospitals for the medical treatment of contaminated injured personnel. **PI Annex, Section A.4** Site-Specific letters of agreement (LOAs) are maintained by PINGP with the following organizations: • Mayo Health Clinic System - Red Wing	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
404	Mayo Clinic Health System has a staff of physicians and hospital personnel trained in the proper methods of contamination control. At least one physician has been offered special courses on the treatment of radiological injuries. Prairie Island NGP conducts yearly training sessions with hospital personnel assuring a knowledge of radiation and contamination control procedures.	No equivalent statement	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
405	Regions Hospital in St. Paul, Minnesota is designated as the definitive care center for Prairie Island Nuclear Generating Plant. Regions Hospital may be used for radiation casualties, severe burn casualties, and other non radiation injuries with use of an appropriate medical air transport service. Medical definitive care centers are offered periodic radiological contamination control training by the Minnesota Division of Homeland Security and Emergency Management (HSEM) according to their plan.	No equivalent statement	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
406	Monitoring instruments and supplies are located at Mayo Clinic Health System to aid in radiation monitoring and contamination control (e.g., DLR's, SRD's, protective clothing, survey meters, etc.).	No equivalent statement	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
407	All casualties on site will be administered emergency First Aid and radiation casualties will be decontaminated to every extent possible prior to departure from the plant site to the hospital. Proper application of first aid will take precedence over decontamination efforts.	No equivalent statement	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
408	Transportation of radiation casualties from Prairie Island NGP will be provided by the Red Wing Ambulance Service. In addition to the Red Wing Ambulance, a plant vehicle could be used as an emergency vehicle for transportation of victims to the hospital.	**PI Annex, Section L.4** Arrangements for the transportation of radiologically contaminated casualties have been made with Red Wing Ambulance Service in Red Wing, Minnesota.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
409	Procedures to be used at the plant and at the hospital in treating victims of an accident involving radiation exposure and/or personnel contamination are established and delineated in Section F4 of the Plant Operations Manual, Medical Support and Casualty Care.	No equivalent statement	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
410	In addition Sacred Heart Hospital in Eau Claire, WI is prepared and will support request for assistance in response to an emergency at the Prairie Island Nuclear Plant. Sacred Heart Hospital will serve as a radiation accident receiving hospital and has a decontamination room and trauma treatment rooms with isolation capabilities.	**PI Annex, Section L.2.b** The primary and backup offsite medical facilities to treat contaminated, injured personnel at PINGP are: Primary – Mayo Clinic Health System located in Red Wing, Minnesota Backup – Regions Hospital in St. Paul, Minnesota	Standard Plan relocates the information to align with the formatting of NUREG-0654, Revision 2, without change to practice or intent.
411	**6.7.4 Whole Body Counting Facilities**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
412	A whole body counter is available at the Prairie Island NGP for determining the uptake of radioactivity. If this area becomes uninhabitable, the person may be transported to Monticello NGP where another whole body counter is available. Additional mobile whole body counters may be brought near or on the site if conditions make it a viable or necessary alternative.	No equivalent statement	The standard Plan does not address Whole Body Counting for response in the Emergency Phase. The Plan retains the commitment to assess personnel exposure during the emergency phase in Section K.
413	**7.0 EMERGENCY FACILITIES AND EQUIPMENT**		
414	**7.1 Emergency Control Centers**		
415	**7.1.1 Technical Support Center (TSC)**		
416	The Technical Support Center (TSC) is located across the Turbine Building from Units 1 & 2 Control Room. A plan view of the TSC is shown in Figure 6.	**PI Annex, Section H.1** The Technical Support Center (TSC) is located across the Turbine Building from Units 1 and 2 Control Room.	The Standard Plan retains the existing TSC but eliminates the organizational diagram to permit flexibility in the use of the space without forcing unneeded Plan changes.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
417	The Technical Support Center (TSC) will serve as a center outside the Control Room from which the plant management, technical, and engineering support personnel will: A. Support the Control Room command and control functions B. Assess the plant status and potential offsite impact C. Coordinate emergency response actions The Technical Support Center has the following capabilities:	**PI Annex, Section H.1** The PINGP Technical Support Center has the following capabilities: • Sufficient working space for ERO and NRC personnel. • Shielding, filtered ventilation, and access to thyroid blocking agents to provide habitability under accident conditions. • Area radiation and continuous airborne monitors are provided to monitor radiological conditions in the facility. • Primary and backup communication links to onsite and offsite emergency response centers. • Access to plant procedures, documents, and records. • The capability to record and display plant system, radiological, and meteorological parameters.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
418	A. Working space for about twenty-five people on the main floor and working space for additional people on the other floor. B. Shielding and ventilation cleanup system (PAC filter) to provide habitability under accident conditions. C. An emergency locker containing monitoring equipment (radiation and airborne), respiratory protection equipment and thyroid blocking agent tablets. D. Communication channels to all onsite and offsite emergency response centers (primary and backup). E. A complete set of as-built drawings and other records such as plant layout drawings.	**PI Annex, Section H.1** (See Column 2 directly above)	The Plan standardizes the language between the three existing Plans without change in practice or intent.
419	**Figure 6 Plan View of TSC**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
420	F. The capability to record and display the following: 1. Plant System Parameters A Reactor Coolant System B Secondary System C ECCS System D Containment 2. In-Plant Radiological Parameters A Reactor Coolant System B Containment C Effluent Treatment D Release Paths E Area Monitors 3. Offsite Radiological Parameters A Meteorology B Offsite Radiation Levels	**PI Annex, Section H.1** The PINGP TSC has the following capabilities: • Sufficient working space for ERO and NRC personnel. • Shielding, filtered ventilation, and access to thyroid blocking agents to provide habitability under accident conditions • Area radiation and continuous airborne monitors are provided to monitor radiological conditions in the facility • Primary and backup communication links to onsite and offsite emergency response centers • Access to plant procedures, documents, and records • The capability to record and display plant system, radiological and meteorological parameters.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
421	The Technical Support Center SHALL be activated within 60 minutes when an Alert, Site Area or General Emergency is declared.	**Section B.1.a, Figure B-1, TSC Organization** **Section, H.1** The TSC is activated within 60 minutes following the declaration of an Alert or higher classification.	Language standardized for TSC activation. No change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
422	The Technical Support Center Coordinator SHALL be responsible for coordinating activities in the TSC. This individual SHALL be responsible for establishing the monitoring of direct radiation and airborne activity in the Technical Support Center. Communications SHALL be established between the TSC, OSC, Control Room and EOF.	**Section B.1.a** TSC Manager • Supervise TSC staffing and activities • Assist the Emergency Director as needed	The Plan standardizes the language between the three existing Plans without change in practice or intent.
423	If activation of the Technical Support Center occurs during normal work hours, instructions to report to the TSC will be received over the plant public address system.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
424	If activation of the Technical Support Center occurs during the off duty hours, the Shift Manager SHALL designate the Shift Emergency Communicator to contact the Emergency Response Organization (ERO) by phone and/or ERO Pager Network and request them to report to the Technical Support Center.	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
425	**7.1.2 Operational Support Center (OSC)**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
426	The Operational Support Center will provide a center to assemble the necessary Operators, Radiation Protection Specialists, Instrument and Control, Electrical, Nuclear Plant Service Attendants, and Maintenance personnel to support the operations of the plant under emergency conditions without causing undue congestion in the Control Room.	**Section H.2** The OSC is activated within 60 minutes following the declaration of an Alert or higher classification. OSC activation at the Unusual Event emergency classification level is optional. **Figure B-3, EOF Organization**	Language was standardized between the three Plans without change in commitment for timely staffing. See Enclosure 1 Section B for justification of OSC staffing.
427	The Operational Support Center is located in the New Administration Building.	**PI Annex, Section H.2** The Operational Support Center is located in the New Administration Building and is provided with the necessary equipment and communications links to support OSC emergency response actions.	No change
428	The Operational Support Center will be activated within 60 minutes when an Alert, Site Area or General Emergency is declared.	**Section H.2** The OSC is activated within 60 minutes following the declaration of an Alert or higher classification. OSC activation at the Unusual Event emergency classification level is optional.	Language was standardized between the three Plans without change in commitment for timely staffing. See Enclosure 1 Section B for justification of OSC staffing.
429	The Operational Support Center Coordinator SHALL be responsible for the activation and coordination of activities in the OSC. The OSC Coordinator may designate a communicator to establish lines of communications between the Operational Support Center, the Control Room and the Technical Support Center.	**Section H.2** The OSC is activated within 60 minutes following the declaration of an Alert or higher classification. OSC activation at the Unusual Event emergency classification level is optional. **Figure B-2, OSC Organization**	Language was standardized between the three Plans without change in commitment for timely staffing. See Enclosure 1 Section B for justification of OSC staffing.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
430	If activation of the OSC occurs during a normal working day, instructions to report to the OSC will be received over the plant public address system. Any Operations shift personnel on site that are not assigned to normal shift duty SHALL report to the OSC immediately. The following personnel will also report to the OSC if on site (additional personnel will be contacted as necessary):	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
431	A. Maintenance Supervisors (Mechanical and Electrical) B. Designated Lead Station Electricians and Maintenance personnel C. Instrument and Control Supervisors D. Radiation Survey Team Members E. Nuclear Plant Service Attendants	**Section B.1.a, Figure B-2, OSC Organization**	The Plan standardizes the language between the three existing Plans without change in practice or intent.
432	If activation of the Operational Support Center occurs during off duty hours, the Shift Manager SHALL designate the Shift Emergency Communicator to activate the onsite emergency organization to establish an initial complement of support personnel to assist in the emergency (additional personnel will be contacted as necessary): A. Maintenance Supervisors (Mechanical and Electrical) B. Designated Lead Station Electricians C. Instrument & Control Supervisors D. Radiation Survey Team Members E. Designated Purchasing & Inventory Control Personnel F. Nuclear Plant Service Attendants	**Section F.1.c** Xcel Energy nuclear sites use an automated ERO Notification System to rapidly notify members of the ERO. The system can notify impacted members of the ERO simultaneously using multiple methods. The vendor supplied notification system is designed with redundant power, and with geographic separation. Activation of the ERO Notification System is performed by on-shift personnel as described in element B.1.a. **Section B.1.a, Figure B-2, OSC Organization**	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
433	Instrumentation is stored in the emergency locker which provides for monitoring both direct radiation and airborne radioactive contaminants.	No equivalent statement	The Plan standardizes the language between the three existing Plans without change in practice or intent.
434	An emergency locker located in the OSC contains all equipment necessary for reentry into the plant. This includes but is not limited to both waterproof and paper coveralls, respiratory protection (SCBAs), dosimeters, radiation detection meters, air samplers, decontamination and first aid equipment.	No equivalent statement	The Plan standardizes the language between the three existing Plans without change in practice or intent.
435	Communication equipment (radio and telephone) is available for contacting designated sections of the emergency response organizations.	**PI Annex Table F.1.b – PINGP Communications Matrix**	The Plan standardizes the language between the three existing Plans without change in practice or intent.
436	**7.1.3 Emergency Operations Facility (EOF)**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
437	The Emergency Operations Facility (EOF) is a required emergency response facility located near the plant site to provide continuous coordination and evaluation of activities during an emergency having, or potentially having, environmental consequences. A plan view of the EOF Command Center is shown in Figure 7. The EOF will be activated within 90 minutes when an Alert, Site Area or General Emergency is declared.	**Section H.3** The EOF is a dedicated facility located in conjunction with Xcel Energy's general offices in Minneapolis and serves as the EOF for Xcel Energy nuclear sites. Access to the EOF is controlled using electronic card readers. The EOF has the capability to display vital plant data and radiological information for each site and unit, in near real time, to be used by knowledgeable individuals responsible for providing technical briefings on plant conditions, event prognosis, and for management of overall emergency response. **Section H.3.a** The EOF is greater than 25 miles from MNGP and PINGP. Xcel Energy maintains space for members of an NRC Site Team and federal responders at a location near those sites. The location and provisions of the near-site facilities is described in the site-specific annexes	The Standard Plan proposes a single EOF applicable to both Xcel Energy Nuclear Sites located beyond 25 miles from the site. See Enclosure 4 for the detailed justification of the proposed change to the single EOF.
438	The functions of the EOF will be: A. Management of the overall NSPM's offsite emergency response in support of plant activities; B. Evaluate the magnitude and effects of actual or potential radioactive releases from the plant;	**Section B.1.a, Figure B-3, EOF Organization**	See Enclosure 4 for the justification of the single EOF.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
439	C. Recommend appropriate offsite protective measures, in conjunction with the TSC personnel; D. Coordinate the offsite radiological monitoring during emergencies and recovery operations; E. Coordinate emergency response activities with those of local, State, Tribal, and Federal emergency response organizations; F. Provide current information on conditions potentially affecting the public to the NRC and to offsite emergency response agencies; G. Act as the post-accident recovery management center for both onsite and offsite activities, if necessary.	**Section B.1.a, Figure B-3, EOF Organization**	See Enclosure 4 for the justification of the single EOF.
440	The EOF will be staffed by personnel from the Engineering and Projects Management groups and Prairie Island Training Center staff. Activation and various responsibilities within the EOF are described fully in Section F8 of the EOF Emergency Plan Implementing Procedures.	No equivalent statement	See Enclosure 4 for the justification of the single EOF.
441	The EOF has been constructed and designed in accordance with the guidance of NUREG-0696. The building has been designed to serve primarily as a Training Center on a regular basis with the capability for prompt conversion to the EOF function when required and, if needed, will serve as the Recovery Center.	No equivalent statement	See Enclosure 4 for the justification of the single EOF.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
442	The EOF is constructed in a manner which provides habitability in an accident situation. Shielding and ventilation treatment systems have been installed to maintain an acceptable environment. The EOF section of the training building is a concrete structure that contains sufficient shielding to exceed a protection factor of 5. The ventilation system has an emergency mode of operation that will pressurize the building through a High Efficiency Particulate Absolute (HEPA) filtration system.	No equivalent statement	See Enclosure 4 for the justification of the single EOF.
443	The general layout of the building's entrances and exits have been given consideration for operation of the building in an emergency mode. Radiological monitoring and alarming are provided for the EOF portion of the building. Extensive communication equipment is installed in the building to provide primary and backup means of communication with outside agencies, offsite survey teams, TSC and the Control Room. The EOF portion of the building is served by a dual source power supply for those services necessary to make the EOF functional.	No equivalent statement	See Enclosure 4 for the justification of the single EOF.
444	The EOF provides office space for each plant support group, key supervisors, state, local and tribal officials, and the NRC, as well as functioning as a command center. Each space is provided with furnishings necessary to perform routine office functions.	No equivalent statement	See Enclosure 4 for the justification of the single EOF.
445	The plant support groups and governmental representatives will perform their respective functions in these assigned offices.	No equivalent statement	See Enclosure 4 for the justification of the single EOF.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
446	The command center is intended to function as a work space for the Emergency Manager, Radiation Protection Support Group, Technical Support Group, and for related critical communications. These activities are assigned to this area, due to the high volume of activity and the importance of the information handled. Additionally, this area is the central area for displaying plant status, offsite survey status, conducting accident assessment and directing the activities of the offsite Emergency Response Organization.	No equivalent statement	See Enclosure 4 for the justification of the single EOF.
447	The EOF is supplied with the equipment necessary to fulfill its function as an offsite emergency response center. Radiation monitoring and decontamination equipment has been provided to supply offsite monitoring teams. Normal and emergency data acquisition is made available via the Emergency Response Computer System (ERCS).	No equivalent statement	See Enclosure 4 for the justification of the single EOF.
448	Office equipment such as facsimile machines, copy machines, microfiche readers, computers and printers connected to the Local Area Network are provided to facilitate administrative duties and technical reference work. General office supplies are stocked in adequate numbers.	No equivalent statement	See Enclosure 4 for the justification of the single EOF.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
449	Operating procedures detailing the methods to activate the EOF, conduct routine administrative operations, surveys and accident assessment, analyze offsite survey samples, provide security and deactivate the Emergency Organization are developed and are available in the EOF. Other organization's procedures, plans and reference documents are also available to EOF personnel. If there is a need for expanded support facilities such as trailer space or communication hook-ups for vendors and support contractors, it may be provided at the EOF.	No equivalent statement	See Enclosure 4 for the justification of the single EOF.
450	Because the EOF is located within the 10 mile EPZ, a Backup EOF exists in case an evacuation of the EOF is necessary. Equipment and facilities necessary to carry out this function are located at Xcel Energy corporate offices in downtown Minneapolis, Minnesota. A description of the Backup EOF facility is described in the Monticello & Prairie Island Offsite Nuclear Emergency Plan.	No equivalent statement	See Enclosure 4 for the justification of the single EOF.
451	**Figure 7 Plan View of EOF Command Center**		
452	**7.1.4 Control Room**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
453	The Control Room SHALL be the initial onsite center of emergency control. Control Room personnel must evaluate and effect control over the initial aspects of the emergency and initiate responses necessary for coping with the initial phases of an emergency until such time that the onsite emergency centers can be activated. These activities SHALL include:	**Section B.1.a** Main Control Room (MCR) Shift Manager/Emergency Director (SM/ED) • Provide overall ERO command and control until relieved. • Evaluate plant conditions and approve Emergency Action Level (EAL) classifications until relieved. • Approve Protective Action Recommendations (PARs) until relieved. • Authorize personnel dose extensions until relieved. • Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs until relieved. • Direct radiation protection activities, including Field Monitoring Team (FMT) direction until relieved. Provide relevant information to personnel communicating offsite PARs to OROs until relieved. • Direct and approve offsite emergency notifications to state and county authorities until relieved.	The Standard Plan assigns the responsibility for emergency response to the Shift Manager and other Control Room personnel until relieved.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
454	A. Continuous evaluation of the magnitude and potential consequences of an incident B. Initial corrective actions	**Section B.1.a** Senior Reactor Operator (SRO)/Shift Technical Advisor (STA) • Evaluate reactor conditions and assess for core damage • Evaluate plant conditions and recommend EAL classifications until relieved	The Standard Plan assigns the responsibility for emergency response to the Shift Manager and other Control Room personnel until relieved.
455	All plant operations are controlled from here by the Shift Manager with direction from the management personnel located either in the Control Room or Technical Support Center.	See Column 2 for previous lines for assignment of responsibilities.	The Standard Plan assigns the responsibility for emergency response to the Shift Manager and other Control Room personnel until relieved.
456	The Control Room contains the necessary instrumentation (process and radiological) to evaluate all plant conditions. Habitability is maintained by shielding and the special ventilation system (PAC Filter), which is capable of operating in a cleanup or recycle mode.	See Column 2 for previous lines for assignment of responsibilities.	The Standard Plan assigns the responsibility for emergency response to the Shift Manager and other Control Room personnel until relieved.
457	All emergency equipment is supplied power from the emergency diesel generators with vital instrumentation powered from inverters connected to the storage batteries located in the battery rooms.	See Column 2 for previous lines for assignment of responsibilities.	The Standard Plan assigns the responsibility for emergency response to the Shift Manager and other Control Room personnel until relieved.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
458	**7.1.5** The Red Wing Service Center (RWSC) is to be used as an Alternative Facility during a hostile action or security event in the event that response to the site is unsafe. The RWSC will be used by TSC and OSC personnel until it has been determined that it is safe to return to the plant site. This facility is accessible in the event of an onsite Hostile Action and provides the ability to perform the following functions:	**Section H.4** An Alternative Emergency Facility for staging of ERO personnel has been designated for each Xcel Energy nuclear site and serves as a location for TSC and OSC personnel should those facilities become uninhabitable or in the cases where the facilities cannot be access such as a hostile action or natural disaster. The location of the Alternative Emergency Facility for each site is provided in the site-specific annexes. **PI Annex, Section H.4**	The Plan standardizes the language between the three existing Plans without change in practice or intent.
459	• Communication with the Control Room and onsite Security Forces • Notification of offsite Emergency Response Organizations • Engineering Assessment Activities including damage control team preparation and planning.	**Section H.4** An Alternative Emergency Facility for staging of ERO personnel has been designated for each Xcel Energy site and serves as a location for TSC and OSC personnel should those facilities become uninhabitable or in the cases where the facilities cannot be access such as a hostile action or natural disaster. The location of the Alternative Emergency Facility for each site is provided in the site-specific annexes. **PI Annex, Section H.4, p. 13**	The Plan standardizes the language between the three existing Plans without change in practice or intent.
460	**7.2 Communications**		
461	Various onsite and offsite communication systems are described in the following sections. Table 5 depicts the various communication links that may be established.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.
462	**7.2.1 Onsite Communications**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
463	All emergency operating facilities have at least two means of communications: (1) portable or installed radio systems; and (2) normal telephone communications.	**PI Annex Section F.1.b** Provisions exist for communications with applicable onsite and offsite emergency organizations.	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.
464	The normal onsite communications during an emergency will be made via the plant telephone system with a public address system option. The telephone system is powered by noninterruptible power. The public address system includes about 175 loudspeakers located throughout the entire plant area.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces..
465	A separate paging system has 20 handsets located at strategic plant areas.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.
466	At approximately 120 locations in the plant, jackboxes are located for the sound powered system. Each box contains six independent circuits for sound powered headsets. A jackbox is located in the Technical Support Center and Control Room.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces..

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
467	The Control Room, Technical Support Center and EOF each have a multi channel radio system console for communications. At least 50 portable radios are available for use throughout the plant during emergency conditions.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.
468	The plant evacuation alarm consists of a 125 VDC operated siren, manually started from the Control Room. This tone consists of a signal starting at approximately 600 cycles per second rising to a peak of approximately 1450 cycles per second, then returning slowly to the low value of 600 cycles per second and repeating.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.
469	The Control Room operator can remove the siren tone for emergency voice communication over the loudspeaker PA system.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces..
470	The plant fire alarm consists of a modulating signal interrupted continuously to give a Yip-Yip-Yip sound. This is activated manually from the Control Room.	No equivalent statement	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.
471	During an emergency, designated individuals will be responsible for the communications at each of the emergency facilities, as delineated in Section 6.1.3.	**Section B.a.1** **Figure B-1, TSC Organization** **Figure B-2, OSC Organization** **Figure B-3, EOF Organization** **Figure B-4, JIC Organization**	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
472	**7.2.2 Offsite Communications**		
473	Both normal and alternate communication links are provided to offsite agencies. Individuals designated to staff the offsite agency communication links are delineated in Section 6.1.3.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	The Plan standardizes the language between the three existing Plans without change in practice or intent.
474	The Xcel Energy telephone network provides normal communications to offsite agencies through telephone lines via the Red Wing US West telephone Exchange, or via Xcel Energy fiber optic SONET communications network.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	The Plan standardizes the language between the three existing Plans without change in practice or intent.
475	The Control Room, Technical Support Center and EOF have a dedicated Xcel Energy radio channel link to the Xcel Energy System Control Center, the Backup EOF, and the Minnesota HSEM Emergency Operating Center in St. Paul, Minnesota.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	The Plan standardizes the language between the three existing Plans without change in practice or intent. Reference to the Backup EOF is eliminated based on the consolidated EOF proposal.
476	The Technical Support Center and EOF have a National Warning System (NAWAS) extension to the Wisconsin Emergency Management EOC at Madison, the Regional Warning Center at Eau Claire and the Pierce County EOC at Ellsworth, Wisconsin.	**PI Annex, Section F.1.b** Provisions exist for communications with applicable onsite and offsite emergency organizations. **PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces..
477	The Control Room, Technical Support Center and EOF each have a portable cellular phone and satellite phone for emergency communication use, as necessary.	**PI Annex, Table F.1.b, PINGP Communications Matrix,**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
478	The Technical Support Center has access to a computerized auto dial system used for notification of the site's Emergency Response Organization (ERO). This system consists of a telephone network of several outgoing telephone lines. When activated, it will call and deliver an emergency message to the plant's emergency organization's home telephones.	**Section H.4** An Alternative Emergency Facility for staging of ERO personnel has been designated for each Xcel Energy nuclear site and serves as a location for TSC and OSC personnel should those facilities become uninhabitable or in the cases where the facilities cannot be access such as a hostile action or natural disaster. The location of the Alternative Emergency Facility for each site is provided in the site-specific annexes.	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.
479	The plant also has an Emergency Response Organization (ERO) Pager Network. Designated members of the site's emergency organization carry personal pagers which can be activated from the Technical Support Center, Control Room or alternate facility (RWSC). A special emergency code is displayed on the pager.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.
480	The Control Room, Technical Support Center and EOF have multi-channel radio system for communication with all Plant Radiation Survey Teams, Plant Operations Personnel, Plant Security Areas, county sheriffs, county EOC's, and Treasure Island Casino (Prairie Island Indian Tribe).	**PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.
481	A telecopying network is set up between the TSC, EOF, state & county EOC's and Prairie Island Indian Tribe for the purpose of telecopying update information.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
482	An emailing network is setup between the offsite agencies for the purpose of emailing the emergency notification form.	**Section E.1** The state and county notification process is completed using a combination of electronic document transmittal and calls using commercial phone lines.	The Proposed Plan uses a combination of electronic mail and commercial phones to transmit and confirm the ORO required 15-minute notifications.
483	Auto ring lines link the Technical Support Center to the EOF and the Technical Support Center to the Minnesota State EOC.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.
484	Communication links are maintained with medical facilities, both fixed and mobile. The plant can update the hospital via the telephone network of the status of any injuries. Communication channels are provided between the hospital and the ambulance service via the radio system while the victim(s) are enroute.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	The Plan designates through the communications matrix the commitment to maintain communications with LLEA and Fire. This supports the ambulance communications.
485	The plant site also supports the NRC's Emergency Telecommunications System (ETS). The dial tone for the Prairie Island G PETS circuits are provided by Xcel Energy's corporate communication network.	**PI Annex, Table F.1.b, PINGPCommunications Matrix**	The Proposed Plan identifies the communications channels maintained between the NRC and Licensee. Specifics to use of the FTS system were eliminated to permit flexibility to update the system and use similar federal guidance as identified in generic communications.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
486	The ETS provides for reporting emergencies and other significant events to the NRC, Incidence Response Center in Rockville, Maryland. Using the Xcel Energy's private network should avoid the public switched network blockage anticipated during a major emergency.	**Section F.1.b** Provisions exist for communications with state, county and tribal governments, NRC, and FMTs within the EPZs Site communications capabilities are described in the site-specific annexes. Telephones have been designated for the following NRC communications: NRC Emergency Notification System (ENS) – This communications line provides a link to the NRC Operations Center in Rockville, Maryland, and is used for initial notifications and continuous communications in a classified emergency. • NRC Health Physics Network (HPN) – This communications line provides a link with the NRC to provide radiological information. • NRC Reactor Safety Counterpart Link (RSCL) – This communications line provides a link for the NRC to conduct internal NRC discussions on plant equipment conditions separate from the licensee. • Protective Measures Counterpart Link (PMCL) – This communications line provides a link for the NRC to conduct internal NRC discussions on radiological releases, meteorological conditions, and the need for protective actions.	The Proposed Plan identifies the communications channels maintained between the NRC and Licensee. Specifics to use of the FTS system were eliminated to permit flexibility to update the system and use similar federal guidance as identified in generic communications.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
487	The ETS provides for reporting emergencies and other significant events to the NRC, Incidence Response Center in Rockville, Maryland. Using the Xcel Energy's private network should avoid the public switched network blockage anticipated during a major emergency.	• Management Counterpart Link (MCL) (Executive Bridge Line) – This communications line provides a communications link for any NRC internal discussions between the NRC Executive Team Director or Executive Team members and the NRC response team leader or top-level licensee management at the site. • Security Bridge – This communications line provides a link to the NRC Security bridge Line for discussions between the NRC, site and EOF personnel.	The Proposed Plan identifies the communications channels maintained between the NRC and Licensee. Specifics to use of the FTS system were eliminated to permit flexibility to update the system and use similar federal guidance as identified in generic communications.
488	The following NRC essential emergency communications functions will be provided by the ETS voice service.	**PI Annex, Table F.1.b, PINGP Communications Matrix** **Standard Plan Section F.1.b** (detail above)	The Proposed Plan identifies the communications channels maintained between the NRC and Licensee. Specifics to use of the FTS system were eliminated to permit flexibility to update the system and use similar federal guidance as identified in generic communications.
489	A. Emergency Notification System (ENS): Initial notification by the licensee, as well as ongoing information on plant systems, status, and parameters. The ENS (Red Phone) is located in the Control Room, with extensions in the Technical Support Center (TSC) and EOF.	**Section F.1.b** Telephones have been designated for the following NRC communications: • NRC Emergency Notification System (ENS) – This communications line provides a link to the NRC Operations Center in Rockville, Maryland, and is used for initial notifications and continuous communications in a classified emergency.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
490	B. Health Physics Network (HPN): Communication with the licensee on radiological conditions (in-plant and off-site) and meteorological conditions, as well as their assessment of trends and need for protective measures on-site and off-site. NRC regional office or NRC Headquarters will announce their decision to establish the HPN link over the ENS. The HPN phones are located in the TSC and EOF.	**Section F.1.b** Telephones have been designated for the following NRC communications: • NRC Health Physics Network (HPN) – This communications line provides a link with the NRC to provide radiological information	The Plan standardizes the language between the three existing Plans without change in practice or intent.
491	C. Reactor Safety Counterpart Link (RSCL): Established initially with the base team, and then with the NRC site team representatives once they arrive at the site, to conduct internal NRC discussions on plant and equipment conditions separate from the licensee, and without interfering with the exchange of information between the licensee and NRC. This is the channel by which the NRC Operations Center supports NRC reactor safety personnel at the site. In addition, this link may also be used for discussion between the Reactor Safety Team Director and licensee plant management at the site. The RSCL phones are located in the TSC and EOF.	**Section F.1.b** Telephones have been designated for the following NRC communications: • NRC Reactor Safety Counterpart Link (RSCL) – This communications line provides a link for the NRC to conduct internal NRC discussions on plant equipment conditions separate from the licensee.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
492	D. Protective Measures Counterpart Link (PMCL): Established initially with the base team, and then with the NRC site team representatives once they arrive at the site, to conduct internal NRC discussions on radiological releases and meteorological conditions, and the need for protective actions separate from the licensee and without interfering with the exchange of information between the licensee and NRC.	**Section F.1.b** Telephones have been designated for the following NRC communications: • Protective Measures Counterpart Link (PMCL) – This communications line provides a link for the NRC to conduct internal NRC discussions on radiological releases, meteorological conditions, and the need for protective actions.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
493	This is the channel by which the NRC Operations Center supports NRC protective measures personnel at the site. In addition, this link may also be used for discussion between the Protective Measures Team Director and licensee plant management at the site. The PMCL phones are located in the TSC and EOF.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.
494	E. Emergency Response Data System (ERDS) Channel: This dedicated computer network is a direct near real-time electronic data link between the plant's on-site computer system and the NRC Operations Center that provides for the automated transmission of a limited data set of selected parameters. The plant activates the ERDS within one hour after declaring an emergency class of Alert, Site Area, or General Emergency. The ERDS supplements the existing voice transmission over the ENS.	**Section C.5.a** ERO personnel will activate or confirm activation of ERDS as soon as possible but not later than one hour after declaring an alert or higher emergency classification level in accordance with 10 CFR 50.72(a)(4).	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
495	F. Management Counterpart Link (MCL): Established for any internal discussions between the Executive Team Director or Executive Team members and the NRC Director of Site Operations or top level licensee management at the site. The MCL phones are located in the TSC and EOF.	**Section F.1.b** Telephones have been designated for the following NRC communications: • Management Counterpart Link (MCL) (Executive Bridge Line) – This communications line provides a communications link for any NRC internal discussions between the NRC Executive Team Director or Executive Team members and the NRC response team leader or top-level licensee management at the site.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
496	G. Local Area Network (LAN) Access: Established with the base team and the NRC site team for access to any of the products or services provided on the NRC Operations Center's local area network. This includes technical projections, press releases, status reports, E-Mail, and various computerized analytical tools. The LAN access points are located in the TSC and EOF.	**PI Annex, Table F.1.b, PINGP Communications Matrix**	Communications capabilities for implementation of the Emergency Plan are incorporated into Site Specific Annex Table F.1.b. Enclosures 2 and 3 of this submittal, Site Specific Justifications, include Attachment 5 documenting specifically the Communication Methods and Interfaces.
497	**Table 5 Prairie Island Site Communications Matrix**		
498	**7.2.3 Alert and Notification System (ANS)**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
499	Within the Plume Exposure Emergency Planning Zone (EPZ) there exist provisions for alerting and providing notification to the public. It is the responsibility of state and county governments to activate this system.	**PI Annex, Section E.2** The Minnesota Division of Homeland Security and Emergency Management (HSEM) is responsible for coordinating the recommendation and making it a decision with appropriate approvals from Pierce, Goodhue and Dakota Counties and the Wisconsin Emergency management and assigning siren activation times and EAS activation times. The Dakota, Goodhue and Pierce County Sheriff's Offices are responsible for activation of the outdoor warning sirens.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
500	The plant maintains a basic fixed siren system for essentially 100% coverage of the offsite population within 5 miles of the plant and population center coverage for the 5-10 mile zone. To reach persons not covered by these population center sirens, Homeland Security Emergency Management or the MN Duty Officer also activates the Integrated Public and Alert Warning System (IPAWS).	**PI Annex, Section E.2** The PINGP ANS system consists of a fixed siren system providing 100% coverage of the populated area within the 10-mile EPZ with primary and backup activation and monitoring of capability; Emergency Alert System (EAS) with primary and backup initiation capability; Integrated Public Alert and Warning System (IPAWS) with primary and backup initiation capability; Wireless Emergency Alert (WEA) System; and county auto-dial notification systems.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
501	A special electronic siren is maintained near the Prairie Island Indian Community Center. The TSC has the capability to activate the siren with a special "stutter" tone at the declaration of a Site Area Emergency for the purpose of quickly notifying Prairie Island's Indian tribal leaders except during a Hostile Action Based (HAB) event. The siren would also be activated with the normal "Alert" tone by the Goodhue County Sheriff's Department during a General Emergency as part of the normal Public Alert and Notification System activation.	**PI Annex, Section E.2** Additional ANS capabilities are provided by PINGP at the Prairie Island Indian Community. An EAS Radio Receiver maintained by Xcel Energy is provided at the Prairie Island Indian Community Administrative Building. In addition, the ANS Siren located near the Prairie Island Indian Community Center can be activated from the TSC at a Site Area Emergency with a special "stutter tone" for the purpose of quickly notifying Prairie Island's Indian tribal leaders.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
502	To supplement PANS, emergency alert radios have been installed in various commercial, institutional, and educational facilities in the 10-mile zone. These locations may harbor large groups of people during all or part of a day, justifying radio alert service, even though many of these facilities are already covered by state and county emergency warning plans. The emergency radios will either be activated by the National Weather Service or by the local county sheriff's dispatch office.	**PI Annex, Section E.2** Activation of the ANS begins with a recommendation to evacuate by the PINGP Emergency Director/Manager. The Minnesota Division of Homeland Security and Emergency Management (HSEM) is responsible for coordinating the recommendation and making it a decision with appropriate approvals from Pierce, Goodhue and Dakota Counties and the Wisconsin Emergency Management and assigning siren activation times and EAS activation times. The Dakota, Goodhue and Pierce County Sheriff's Offices are responsible for activation of the outdoor warning sirens.	The Plan standardizes the language between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
503	In the event of an emergency condition, alert and notification information will be relayed through established communication links described in the Minnesota and Wisconsin emergency response plans. Upon receiving notification of the emergency, offsite governments will, if necessary, activate public warning and information procedures which include the State Emergency Alert System (EAS). With this system, essentially 100% of the population in the 10 mile EPZ will be alerted within 15 minutes.	**PI Annex, Section E.2** The Minnesota Division of Homeland Security and Emergency Management (HSEM) is responsible for coordinating the recommendation and making it a decision with appropriate approvals from Pierce, Goodhue and Dakota Counties and the Wisconsin Emergency management and assigning siren activation times and EAS activation times. The Dakota, Goodhue and Pierce County Sheriff's Offices are responsible for activation of the outdoor warning sirens.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
504	In the event a county primary siren activation system fails to operate, each county has a backup siren activation process on a separate activation system utilizing a different tower and controls for activation of the sirens.	**PI Annex, Section E.2** The PINGP ANS system consists of a fixed siren system providing 100% coverage of the populated area within the 10-mile EPZ with primary and backup activation and monitoring of capability; Emergency Alert System (EAS) with primary and backup initiation capability; Integrated Public Alert and Warning System (IPAWS) with primary and backup initiation capability; Wireless Emergency Alert (WEA) System; and county auto-dial notification systems.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
505	In conjunction with the siren system activation, the Integrated Public Alert Warning System (IPAWS) is also activated. This system is also used as a backup when the siren system or individual sirens are out of service.	Same as above	The Plan standardizes the language between the three existing Plans without change in practice or intent.
506	**7.3 Assessment Facilities**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
507	The plant instrumentation and monitors perform indicating, recording and protective functions. The Reactor Protection System and associated plant instrumentation provide the ability to maintain plant safety from shutdown to full power operations and to monitor and maintain key variables such as reactor power, flow, temperature, and radioactivity levels within predetermined safe limits at both steady state conditions and during plant transients. Plant instrumentation and control systems also provide means to cope with abnormal operating conditions. The control and display of information of these various systems are centralized in the main Control Room. This instrumentation would provide the basis for initiation of protective actions.	**Section H.7** A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities. Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.	The Plan standardizes the language between the three existing Plans without change in practice or intent.
508	**7.3.1 Onsite Systems and Equipment**		
509	**A. Geophysical Phenomena Monitors**		
510	**1.Meteorological**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
511	Prairie Island has a 60 meter onsite meteorological tower located approximately 0.5 miles northwest of the plant. The tower is equipped with primary and secondary redundant sensors for the 10 and 60 meter temperatures, wind speeds, and wind directions powered by a primary and secondary power source. The following meteorological information is supplied by the tower:	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM). **Section H.8** **Meteorological Monitoring** Meteorological information from offsite sources can be obtained from the National Weather Service. Xcel Energy can contact the National Weather Service to obtain additional synoptic scale weather data and compile a site-specific atmospheric diffusion assessment for each Xcel Energy site.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
512	A Wind Direction (10 and 60 meter) B Wind Speed (10 and 60 meter) C Ambient Temperature D deltaT between 10 and 60 meter temperature indications E Precipitation A 22 meter backup meteorological tower is located near the EOF. The backup meteorological tower provides the following: All meteorological data is processed via the ERCS, and may be displayed in the Control Room, TSC, EOF, and Backup EOF. Barometric pressure is also available in the Control Room.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
513	**2. Seismic**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
514	The Control Room has an installed earthquake detection system with a three step graded severity level of alarms: a. Seismic Event – 3 percent vertical or horizontal acceleration b. Operational Basis Earthquake – 4 percent vertical or 6 percent horizontal acceleration (No equipment failure) c. Design Basis Earthquake – 8 percent vertical or 12 percent horizontal acceleration (possible equipment failure)	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM). **Section H.8** **Seismic Monitoring** Seismic information from offsite sources can be obtained from the National Earthquake Information Center. A considerable array of seismometers is in the region. A central point of contact to obtain information about a seismic event is the USGS in Reston, Virginia.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
515	A visual and audible alarm will sound in the Control Room. Upon activation, the accelerometers and accelerographs listed on Table 6 will be automatically recorded for future investigation.	**Section H.8** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
516	**3. Hydrologic**		
517	River water level is available from two sources: a. Indicators in Control Room which receive a signal from capacitance level probes located in several locations in the river water canals and the intake screenhouse. b. Lock and Dam #3 (located about 1.6 miles SE) which would give essentially the same indication as at Prairie Island NGP.	No equivalent statement	The Standard Plan does not depend on offsite hydrologic data. The Emergency Plan and the Emergency Action Levels depending on determination of river level are directed to onsite instrumentation.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
518	**B. Radiation Monitoring Equipment**		
519	Onsite radiation monitoring equipment at Prairie Island NGP can be categorized into the following groups: 1. Process radiological monitoring system 2. Effluent radiological monitoring system 3. Airborne radioactivity monitoring system 4. Area radiation monitoring system 5. Portable survey and counting room equipment	**Section H.7** A plant computer system provides a display of plant parameters from which the safety status of operation may be assessed in the MCR, TSC, and EOF. Primary and secondary power sources are supplied to this system. Displays are available in the TSCs, OSCs, EOF and Alternative Facilities. Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential process monitoring is available in the emergency facilities through facility computer and display systems.	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
520	Table 7 lists all the area, process, and effluent monitors. Table 8 lists the general types of portable survey, count room, airborne monitoring and personnel monitoring equipment.	No equivalent statement	The Standard Plan aligns the language between the three existing plans without change in practice or intent.
521	**C. Process Monitors**		
522	Adequate instrumentation monitoring capability exists to properly access the plant status during all modes of operation, i.e., instrumentation is available to the operator to determine plant status, aid in emergency classification determination, and aid in post accident assessment.	**Section N.4.g** Testing of Post-accident sampling systems are completed as a function of site technical specifications.	The Plan aligns wording between the three existing Plans without change in practice or intent.
523	Table 9 lists available instrumentation, ranges and their indicator locations.	No equivalent statement	The Plan aligns wording between the three existing Plans without change in practice or intent.
524	**D. Fire Detection**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
525	The fire detection system consists of various types of detectors/flow devices throughout the main power building and in most of the outbuildings. Ionization, flame and thermal type fire detectors are located throughout safety related structures. Audible alarming is on the Control Room annunciator panel system for actuation or trouble. The Control Room fire panel system will indicate zone location of the alarm. On receipt of the annunciator panel alarm, the fire panel is checked for location and operator assigned to effected area is called for immediate investigation.	No equivalent statement	The Fire Protection System is controlled by Technical Specifications and/or the Fire Plan. NUREG-0654, Revision 2, structure to focus the Plan on Emergency Plan functions eliminates the need for this system description.
526	Further details of the fire detection system are given in the plant safety procedures, Section F5 Appendix K, "Fire Detection and Protection Systems."	No equivalent statement	The Fire Protection System is controlled by Technical Specifications and/or the Fire Plan. NUREG-0654, Revision 2, structure to focus the Plan on Emergency Plan functions eliminates the need for this system description.
527	**E. Post Accident Liquid Sampling**		
528	A post-accident liquid sampling system is installed at Prairie Island with associated procedures to provide the capability to obtain the following samples: 1. Sample of raw reactor water 2. Diluted samples of reactor water (boron, chloride, isotopic analysis, pH, etc.) 3. Dissolved gas sample for isotopic analysis (noble gases) 4. Dissolved hydrogen sample	**Section N.4.g** Testing of Post-accident sampling systems are completed as a function of site technical specifications.	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
529	The sampling system includes the following exposure reduction equipment: 1. Shielded sample lines and shielded drain lines in the Hot Sample Room. 2. Shielded sample panel which allows collections and analysis of a reactor coolant sample for hydrogen and isotopic analysis. 3. Shielded sample carriers for transporting samples to remote facilities (Hot Cell). 4. Remote analysis lab (Hot Cell) located on 695 foot elevation in the Turbine Building. 5. Shielded work area in the Hot Cell with an exhaust hood installed, which discharges through a PAC filter unit. 6. Remote counting labs with geometries for counting extremely high level radioactivity samples.	**Section N.4.g** Testing of Post-accident sampling systems are completed as a function of site Technical Specifications.	The Plan aligns wording between the three existing Plans without change in practice or intent.
530	This system allows sample collection and analysis within the radiation exposure guidelines given in NUREG-0578.	**Section N.4.g** Testing of Post-accident sampling systems are completed as a function of site technical specifications.	The Plan aligns wording between the three existing Plans without change in practice or intent.
531	**F. Containment Air Sampling**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
532	Following an accident, a containment air sample may be obtained, utilizing the gas analyzer to extract a sample via the Hydrogen Post LOCA System for determination of: 1. Hydrogen content 2. Isotopic analysis (noble gas)	**Section I.3** The Xcel Energy ERO monitors plant parameters using information provided by plant data transmittal systems to assess the status of reactor fuel using core damage assessment procedures. The ERO also monitors plant data transmittal systems to evaluate the status of containment integrity, systems used to mitigate the release of radioactive material to the environment and to identify leakage of radioactive material from plant systems, structures, and components. By observing effluent and process monitors, the onset and duration of an actual release of radioactive material to the environment can be determined, or these parameters estimated for a potential release.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
533	All sampling will be completed within the exposure guidelines of NUREG-0578.	No Equivalent Statement	Exposure Control for Emergency Responders is managed under Section K of the Plan. Separate guidance for sampling is not required.
534	**G. Shield Building Vent Sample**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
535	The Shield Building Stack Hi-Range Monitor (located in the third floor of the turbine building) extracts a sample from the Shield Building stack and pumps it through a large sample chamber which houses the radiation detector. The hi-range detector reading is in mR/hr and is easily converted to mCi/cc via the applicable calibration curves.	**Section I.1.a** The magnitude of a release of radioactive material to the environment is primarily identified directly by effluent monitors. Survey and sample analysis may also be used to determine the magnitude of a release. Indirect means such as core damage estimates and release pathway assumptions may be used to estimate the magnitude of a release of radioactive material. The isotopic composition of a release of radioactive material to the environment may be determined by; (1) specialized gaseous monitors that distinguish between gasses, iodines and particulate, (2) survey and sample analysis, or (3) source term estimates based on core damage and release pathway assumptions.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used
536	Prior to entering the sample chamber, the sample flow is directed through a particulate filter and a silver zeolite adsorber. The particulate filter and silver zeolite adsorber are manually removed and prepared for analysis in the counting labs.	See Above	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
537	**NOTE:** Silver zeolite adsorbers eliminate the problem of entrapped noble gases on the iodine adsorber allowing a much lower detection sensitivity. In addition, air or N2 may be used to blow out the adsorber to further eliminate the entrapped noble gases.	See Above	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
538	In instances of monitor failure or offscale readings, procedures are available to allow the dose rate on the sample chambers to be measured using portable survey meters. The release concentration can then be calculated by converting the dose rate to concentration utilizing applicable calibration curves.	**Section I.1.a** The magnitude of a release of radioactive material to the environment is primarily identified directly by effluent monitors. Survey and sample analysis may also be used to determine the magnitude of a release. Indirect means such as core damage estimates and release pathway assumptions may be used to estimate the magnitude of a release of radioactive material. The isotopic composition of a release of radioactive material to the environment may be determined by; (1) specialized gaseous monitors that distinguish between gasses, iodines and particulate, (2) survey and sample analysis, or (3) source term estimates based on core damage and release pathway assumptions.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
539	**H. Containment High Range Area Monitors**		
540	Two channels of Containment High Range Dome monitors are installed in the containments. Full scale reading on these monitors is 108 R/hr. This allows personnel to estimate the amount of activity in containment available for release and the severity of the accident from the applicable calibration curves.	See Above	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
541	**I. In-Plant Iodine Determination**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
542	During emergency conditions, it will be necessary for emergency personnel to rapidly and accurately determine or estimate the airborne iodine activity in areas of the plant including all operating centers.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
543	Samples for iodine activity are obtained with portable air samplers (AC and battery operated) and continuous air monitors (CAM's). The iodine is collected on silver zeolite adsorbers.	No Equivalent Statement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
544	**NOTE:** The use of silver zeolite adsorbers reduces the amount of noble gases entrapped on the adsorber. This reduces the minimum sensitivity level of iodine on the adsorber. In addition, air or N2 may be used to blow out the adsorber to further reduce the amount of entrapped noble gases.	No Equivalent Statement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
545	The silver zeolite adsorbers may be analyzed using the GEM system in the onsite counting room or the EOF Counting Room. The adsorbers could also be analyzed with portable instrumentation.	No equivalent statement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
546	The Control Room, Operational Support Center, Technical Support Center and EOF have continuous air monitors (CAM's) available to monitor the airborne iodine levels. A detector is continuously analyzing the activity (iodine) trapped on the carbon-impregnated filter paper.	No equivalent statement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
547	This combination of equipment allows iodine determinations under all plant accident conditions.	No equivalent statement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. The previous statement was the intent of the Plan writers but a commitment to assess iodine in all conditions is functionally unattainable.
548	An Iodine Monitoring program, acceptable to the NRC, was described in letters from L.O. Mayer, NSP, to Director of Nuclear Reactor Regulation, dated December 31, 1979, "Lessons Learned Implementation" and March 13, 1980, "1/1/80 Lessons Learned Implementation Additional Information."	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
549	**J. Steam Line Monitors**		
550	The steam line radiation monitor in conjunction with the ERCS (Emergency Response Computer System) computer will supply a value for noble gas activity released via the steam headers (steam dumps and safeties).	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
551	An alternate steam header release calculation procedure exists which allows the determination to be made with portable radiation equipment and applicable calibration curves. This will allow a backup method for release determination during instances of monitor failure.	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
552	**NOTE:** Normally the air ejector discharge is routed to the Shield Building Exhaust stacks which are monitored by the low and high range stack radiation monitors.	**Section I.1.a** The magnitude of a release of radioactive material to the environment is primarily identified directly by effluent monitors. Survey and sample analysis may also be used to determine the magnitude of a release. Indirect means such as core damage estimates and release pathway assumptions may be used to estimate the magnitude of a release of radioactive material. The isotopic composition of a release of radioactive material to the environment may be determined by; (1) specialized gaseous monitors that distinguish between gasses, iodines and particulate, (2) survey and sample analysis, or (3) source term estimates based on core damage and release pathway assumptions.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
553	**K. Air Ejector Noble Gas Release**		
554	Releases through the air ejectors are quantified via: (1) the installed air ejector radiation monitor and applicable calibration curves; (2) the Shield Building Exhaust Stack monitors (low and high range) and their applicable calibration curves; or (3) by local sample analysis.	See Column 2 above	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
555	**Table 6 Seismographic Monitoring Devices** **Triaxial Accelerometers** **Triaxial Accelerographs**	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM) **Section H.8** **Seismic Monitoring** Seismic information from offsite sources can be obtained from the National Earthquake Information Center. A considerable array of seismometers is in the region. A central point of contact to obtain information about a seismic event is the USGS in Reston, Virginia.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
556	**Table 7 Radiation Monitors** **Area Monitors** **Process Monitors**	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM). **Section I.3** The Xcel Energy ERO monitors plant parameters using information provided by plant data transmittal systems to assess the status of reactor fuel using core damage assessment procedures. The ERO also monitors plant data transmittal systems to evaluate the status of containment integrity, systems used to mitigate the release of radioactive material to the environment and to identify leakage of radioactive material from plant systems, structures, and components. By observing effluent and process monitors, the onset and duration of an actual release of radioactive material to the environment can be determined, or these parameters estimated for a potential release.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used. Additionally, alternative means of acquiring the data are specified.
557	**Table 8 Radiation Monitoring Instruments and Devices** **Portable Survey Instruments** **Portable Air Sampling Equipment** **Analysis Equipment** **Personnel Monitoring Equipment**	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
558	**NOTE:** Exact quantities and locations are described in the plant's surveillance program procedures.	No equivalent etatement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
559	**Table 9 Instruments Available for Monitoring Major Systems**	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
560	**7.3.2 Facilities and Equipment for Offsite Monitoring**	**Section H.7** Xcel Energy nuclear sites have installed instrumentation for seismic monitoring, radiation monitoring, fire detection and meteorological monitoring, in accordance with their USAR, Technical Specifications (TS) and Offsite Dose Calculation Manual (ODCM). **Section I.1.a** The magnitude of a release of radioactive material to the environment is primarily identified directly by effluent monitors. Survey and sample analysis may also be used to determine the magnitude of a release. Indirect means such as core damage estimates and release pathway assumptions may be used to estimate the magnitude of a release of radioactive material. The isotopic composition of a release of radioactive material to the environment may be determined by; (1) specialized gaseous monitors that distinguish between gasses, iodines and particulate, (2) survey and sample analysis, or (3) source term estimates based on core damage and release pathway assumptions.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
561	**A. Meteorological**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
562	Several locations, exterior to the plant site, can be used to obtain offsite meteorological conditions. Locations and outputs are summarized in Table 10.	**Section H.8** **<u>Meteorological Monitoring</u>** Meteorological information from offsite sources can be obtained from National Weather Service. Xcel Energy can contact the National Weather Service to obtain additional synoptic scale weather data and compile a site-specific atmospheric diffusion assessment for each Xcel Energy site.	The Plan aligns wording between the three existing Plans without change in practice or intent.
563	**B. Assessment Equipment**		
564	1. The EOF Count Room contains a GEM detector system and Geiger-Mueller counter to analyze offsite samples. 2. The emergency lockers in the Assembly Points have the equipment necessary to collect and analyze air samples (particulate and iodine) and portable instruments for measuring radiation levels. 3. The hospital emergency kit at Mayo Clinic Health System has instruments for measuring radiation levels and contamination levels of radiation casualties arriving at the medical center for medical treatment. 4. All Monticello Nuclear Plant counting room and portable radiation detection equipment is available for analysis of samples from Prairie Island NGP.	No equivalent statement	Chemistry function is no longer included in NUREG-0654, Revision 2, as an EP function resulting in the deletion of this section.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
565	5. There are TLD badges and airborne particulate and iodine sampling stations installed in areas surrounding the plant. The badges and air sampling stations are installed as part of the Radiation Environmental Monitoring Program. During an emergency, these badges and/or air sampling filters or cartridges may be used for dose assessment purposes.	**Section H.8** **Radiological Monitoring** Offsite monitoring programs that include the use of fixed dosimetry and air sampling capability are developed within the Radiological Environmental Assessment Program (REMP) at each site as described in the site-specific Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
566	6. All onsite portable equipment and count room equipment at Prairie Island NGP may be used for required offsite radiation surveys or analysis of offsite samples (liquid or airborne).	No equivalent statement	Integration of the Site Plans and the Corporate Plans eliminates the need for this statement.
567	**Table 10 Offsite Meteorological Equipment**	**Section H.8** **Radiological Monitoring** Offsite monitoring programs that include the use of fixed dosimetry and air sampling capability are developed within the Radiological Environmental Assessment Program (REMP) at each site as described in the site-specific Offsite Dose Calculation Manual (ODCM).	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
568	**NOTE:** Meteorological information from Lock and Dam #3 is available on a twenty-four hour per day basis.	No equivalent statement	The Standard Plan does not depend on offsite hydrologic data. The Emergency Plan and in particular the Emergency Action Levels depending on level are directed to onsite instrumentation.
569	**7.4 Protective Facilities and Equipment**		
570	**7.4.1 Assembly Points**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
571	The primary protective facility for onsite personnel is the evacuation to an assembly point. Either the Distribution Center or the North Warehouse may be used for an assembly point depending on wind direction. The Emergency Director SHALL designate which one is to be used.	**Section J.4** Assembly and accountability is conducted following the declaration of a Site Area or General Emergency, or at the discretion of the Emergency Director and is initiated via site assembly announcement. Accountability of personnel within the Protected Area is accomplished within 30 minutes following emergency declaration and maintained continuously thereafter as described in the Security Plan. Accountability may be delayed during a security event if the Emergency Director, in consultation with Security, determines that performing accountability could be detrimental to the safety of plant personnel. If accountability is delayed, then accountability will be performed as soon as conditions permit.	Assembly Points are not discussed in the Standard Plan. The Standard Plan maintains the commitment to provide the capability for Assembly/Accountability without a detailed description of the specific methodology used.
572	The assembly area emergency locker contains equipment that will be used for personnel contamination checks, personnel decontamination, radiation detection equipment to assess conditions at the assembly area and communication equipment for contact with the Emergency Director.	No equivalent statement	The Standard Plan maintains the commitment to provide the capability for Assembly/Accountability without a detailed description of the specific methodology used.
573	**7.4.2 Operational Support Center**		
574	The Operational Support Center locker contains all the equipment necessary for reentry into the plant.	**Section J.5** Each site maintains an inventory of equipment and potassium iodide (KI) available for use by emergency workers. The Emergency Director has the responsibility for approval of issuing KI to site emergency workers.	The Plan retains the commitment to provide protective equipment for onsite personnel.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
575	This includes protective clothing, respiratory protection, monitoring devices, and radiation meters. Air sampling and contamination survey equipment is available for onsite surveys. Decontamination and first aid equipment is available for treatment of onsite personnel.	**Section J.5** Each site maintains an inventory of equipment and potassium iodide (KI) available for use by emergency workers. The Emergency Director has the responsibility for approval of issuing KI to site emergency workers.	The Plan retains the commitment to provide protective equipment for onsite personnel.
576	**7.4.3 Emergency Operations Facility**		
577	The EOF can be designated as an alternate assembly area. Facilities are available for gathering personnel into a specific area. An emergency locker contains equipment necessary for determining personnel contamination and for decontamination of individuals. A decontamination shower and retention system is available for collection of contaminated waste. A spare Field Survey Team Equipment Kit is located at the EOF.	No equivalent statement	The area previously designated as the EOF will no longer be used as an EOF. The Plan retains the commitment to provide protective equipment for onsite personnel.
578	Communication equipment (radio and telephone) is available for contacting emergency personnel both onsite and offsite.	No equivalent statement	The area previously designated as the EOF will no longer be used as an EOF.
579	**7.4.4 Mayo Clinic Health System**		
580	Mayo Clinic Health System has the equipment required to handle medical emergencies complicated by radioactive contamination. Monitoring equipment, decontamination materials and waste storage (solid and liquid) are available.	**PI Annex, Section A.4** Site -specific letters of agreement (LOAs) are maintained by PINGP with the following organizations: • Mayo Clinic Health System – Red Wing	The Plan aligns wording between the three existing Plans without change in practice or intent.
581	**7.4.5 Red Wing Fire Station**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
582	DLR's and Electronic dosimeters (SRD's) will be issued to Emergency responders eg. when they arrive on site before entering the Protected Area.	**PI Annex, Section A.4** Site -specific letters of agreement (LOAs) are maintained by PINGP with the following organizations: • City of Red Wing	The Plan aligns wording between the three existing Plans without change in practice or intent.
583	All dosimeters and DLR's are maintained by plant personnel.	**Section L.2.c** Xcel Energy personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Hospitals are equipped and hospital personnel trained to address contaminated injured individuals and basic training on the nature of radiological emergencies. Radiological controls capability, including the isolation of contamination, assessment of contamination levels, radiation exposure monitoring for medical facility staff, collection of contaminated waste, and decontamination of treatment areas are described in licensee radiation protection department and hospital procedures.	The Plan aligns wording between the three existing Plans without change in practice or intent.
584	**7.4.6 Technical Support Center Emergency Locker**		
585	The Technical Support Center emergency locker contains the necessary survey instruments, dosimetry and protective clothing to allow reentry or access into the plant during emergency conditions.	**Section H.12** Emergency kits may be assembled for radiation protection, field monitoring, first aid or other emergency use needs based on location and availability at each site.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
586	**7.5 First Aid and Medical Facilities**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
587	First Aid Kits are available at various emergency lockers in the plant. Any injury requiring medical treatment will be treated at the local medical center. All medical support is covered by Section F4 of the Operations Manual, Medical Support and Casualty Care.	**Section H.12** Emergency kits may be assembled for radiation protection, field monitoring, first aid or other emergency use needs based on location and availability at each site.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
588	**7.6 Damage Control Equipment and Supplies**		
589	The maintenance area has a completely supplied machine shop with equipment necessary to machine all but the largest pieces of equipment, (e.g., turbine rotors).	No equivalent statement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
590	One shop area, located in the Auxiliary Building, is for contaminated items. The other shop, located in the Service Building, is for non-contaminated items.	No equivalent statement	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
591	**8.0 MAINTAINING EMERGENCY PREPAREDNESS**		
592	**8.1 Organizational Preparedness**		
593	**8.1.1 Emergency Response Training**		
594	To achieve and maintain an acceptable level of emergency preparedness, training SHALL be conducted for members of the on-site Emergency Response Organization in accordance with the Prairie Island Nuclear Generating Plant Emergency Plan Training Program.	**Section O.1** Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency. Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.	The Plan aligns wording between the three existing Plans without change in practice or intent.
595	Training for all on-site Emergency Response Organization members consists of a review of the Emergency Plan in the form of a general overview. In addition to Emergency Plan overview training, personnel assigned key on-site emergency response positions SHALL receive training specific to their position.	Same as above	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
596	Key Emergency Response Organization members SHALL receive Emergency Plan training on an annual basis.	**Section O.1** Initial training and annual retraining will be conducted for members of the ERO and offered to those offsite organizations that may be called upon to assist the site in the event of an emergency. Details on the content and conduct of ERO training are maintained in the Xcel Energy EP Training Program Description.	The Plan aligns wording between the three existing Plans without change in practice or intent.
597	Monticello & Prairie Island offsite support will make provisions for the training of those off-site organizations who may be called upon to provide assistance in the event of an emergency.	**Section O.1.a** Xcel Energy offers emergency response training annually for those offsite organizations that may be called upon to provide onsite assistance in the event of an emergency. They are invited to attend training applicable to the Xcel Energy nuclear site or sites where they could provide assistance. Training of state and county offsite response organizations is described in their respective radiological emergency plans, with support provided by Xcel Energy, if requested.	The Plan aligns wording between the three existing Plans without change in practice or intent.
598	**8.1.2 Exercises, Drills, and Tests**		
599	The conduct of periodic drills and exercises are conducted in accordance with the guidance provided in FP-EP-WI-14, Emergency Preparedness Drill and Exercise Manual and FP-EP-WI-24, Emergency Preparedness Drill and Exercise Objectives.	No equivalent statement	Incorporation of the Offsite Nuclear Emergency Plan into the Standard Plan eliminates the need for the reference. Section N in its entirety controls the drill and exercise program.
600	**A. Exercises**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
601	Exercises which test the integrated capability and a major portion of the basic elements existing within the Emergency Plan SHALL be conducted at least every 2 years. This exercise may be included in the full participation biennial exercise which tests the offsite emergency plans.	**Section N.2.a** Each Xcel Energy nuclear site will conduct a Plume Exposure Pathway (PEP) Exercise biennially. This exercise includes mobilization of licensee state, local, and tribal government personnel and resources and implementation of emergency plans to demonstrate response capabilities. State, county and tribal authorities are invited to participate in PEP exercises. If a state, county or tribal organization chooses not to participate it will be documented that they were given the opportunity to participate. PEP exercise scenarios are submitted to the NRC under 10 CFR 50.4 at least 60 days before they are held.	The Plan aligns wording between the three existing Plans without change in practice or intent.
602	**B. Drills**		
603	Drills are supervised instructional periods aimed at testing, developing and maintaining skills in a particular operation and are a part of the continuous training program.	No equivalent statement	Drill and Exercise Language in Section N were aligned to the format of NUREG-0654, Revision 2.
604	In order to ensure that adequate emergency response capabilities are maintained during the interval between biennial exercises, drills SHALL be conducted including at least one drill, during the off exercise year, involving a combination of some of the principal functional areas of the onsite emergency response capabilities.	No equivalent statement	Drill and Exercise Language in Section N were aligned to the format of NUREG-0654, Revision 2.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
605	The principal functional areas of emergency response include activities such as management and coordination of emergency response, accident assessment, protective action decision making, and plant system repair and corrective actions. During these drills, activation of all of the Emergency Plan's response facilities (TSC, OSC, and EOF) would not be necessary, opportunities to consider accident management strategies would be given, supervised instruction would be permitted, operating staff would have the opportunity to resolve problems (success paths) rather than have controllers intervene, and the drills could focus on onsite training objectives.	No equivalent statement	Drill and Exercise Language in Section N were aligned to the format of NUREG-0654, Revision 2.
606	Drills SHALL be conducted in the following areas at the designated minimal frequency. Additional drills may be scheduled by plant management if dictated by response of personnel to previous drills.	No equivalent statement	Drill and Exercise Language in Section N were aligned to the format of NUREG-0654, Revision 2.
607	**1. Fire**		
608	Fire drills SHALL be conducted in accordance with Prairie Island Administrative Work Instructions (AWIs) and/or the NSPM's Quality Assurance Topical Report.	No equivalent statement	Fire Drills are conducted as part of the Site Fire Plan. In alignment with the NUREG-0654, Revision 2, philosophy no longer addressed in the Emergency Plan.
609	**2. Medical Emergency**		
610	Medical emergency drills involving the transport of a simulated contaminated individual causing the participation of local support agencies SHALL be conducted annually.	**Section N.4.a** Each Xcel Energy nuclear site will conduct an emergency medical drill once per calendar year. The scope of the emergency medical drill will include a simulated contaminated individual and invitation for participation by support services agencies.	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
611	**3. Radiological**		
612	The periodic radiological and health physics drills described below may be conducted as part of the annual Radiation Protection Specialist continuing training program in the form of walkthroughs or job performance measured activities. These drills may also be conducted as part of an annual plant wide full scale drill or facility drill.	No equivalent statement	Drill and Exercise Language in Section N were aligned to the format of NUREG-0654, Revision 2.
613	**a -** Health Physics Drills which involve response to, and analysis of, simulated elevated airborne and/or liquid samples and direct radiation measurements in the environment SHALL be conducted semi-annually.	No equivalent statement	Drill and Exercise Language in Section N were aligned to the format of NUREG-654, Revision 2.
614	**b** - Radiological monitoring drills which include the collection and analysis of environmental samples for the purpose of ground deposition assessment SHALL be conducted annually.	**Section N.4.d** Each Xcel Energy nuclear site will conduct an environmental monitoring drill once per calendar year. The scope of the environmental monitoring drill will include performance objectives for direct radiation measurements in the environment, collection and analysis of sample media including water, vegetation, soil, and air, provisions for communications and record keeping.	The Plan aligns wording between the three existing Plans without change in practice or intent.
615	**c** - Post accident sampling drills which include the analysis of in-plant liquid samples (with simulated elevated radiation levels) including the use of the Post Accident Sampling System (PASS) SHALL be conducted annually.	**Section N.4.g** Testing of Post-accident sampling systems are completed as a function of site technical specifications.	The Plan aligns wording between the three existing Plans without change in practice or intent.
616	**4. Security**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
617	Hostile Action Drills will be conducted to verify readiness to mitigate after a terrorist event. These drills will be conducted in accordance with FP-EP-WI-14 and FP-EP-WI-24.	**Section N.3.a** Each Xcel Energy nuclear site will conduct at least one HAB scenario in a drill or exercise within an eight-year cycle. The HAB scenario will include either a radiological release scenario or no/minimal radiological release scenario. HAB scenarios combined with a no/minimal radiological release scenario will not be used consecutively in exercises.	The Plan aligns wording between the three existing Plans without change in practice or intent.
618	**5. Emergency Organization Augmentation**		
619	Semi-annual Emergency Organization Augmentation Drills are conducted to provide an ongoing verification that the emergency organization can augment the shift organization in a timely fashion.	**Section N.1.c** Each Xcel Energy nuclear site will conduct at least one drill or exercise between 6:00 pm and 4:00 am within an eight-year exercise cycle. This requirement may be satisfied by an actual event provided it meets the above criteria and the objectives are evaluated and documented in a critique report for the augmentation of the ERO.	The Plan aligns wording between the three existing Plans without change in practice or intent.
620	**C. Tests**		
621	A test is a functional test of equipment to verify that the equipment is operable.	No equivalent statement	
622	**1.** Communications with state, local and tribal governments within the plume exposure pathway SHALL be tested monthly.	**Section N.4.f** Communications Drills are accomplished during testing described in element F.3.	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
623	**2.** Communications with Federal response organizations and State governments within the ingestion pathway SHALL be tested quarterly.	**Section F.3** Communications tests will be conducted and documented on the frequency specified below. The tests include provisions to ensure participants in the test are able to understand the content of the messages in the test. Systems used to communicate from the MCR, TSC, and EOF to NRC Headquarters and NRC Regional Office Operations Center are tested monthly.	The Plan aligns wording between the three existing Plans without change in practice or intent.
624	**3.** Communications between Prairie Island, Minnesota and Wisconsin Emergency Operating Centers and all local Emergency Operations Centers, and radiation monitoring teams SHALL be checked annually.	**Section N.4.f** Communications Drills are accomplished during testing described in element F.3.	The Plan aligns wording between the three existing Plans without change in practice or intent.
625	**4.** Communication from the Control Room, TSC and EOF to the NRC Operations Center SHALL be tested monthly.	**Section F.3** Communications tests will be conducted and documented on the frequency specified below. The tests include provisions to ensure participants in the test are able to understand the content of the messages in the test. Systems used to communicate from the MCR, TSC, and EOF to NRC Headquarters and NRC Regional Office Operations Center are tested monthly.	The Plan aligns wording between the three existing Plans without change in practice or intent.
626	**5.** The Emergency Response Data System (ERDS) SHALL be tested on a quarterly basis.	**Section F.3** Communications tests will be conducted and documented on the frequency specified below. The tests include provisions to ensure participants in the test are able to understand the content of the messages in the test. The ERDS is verified as connected and transmitting data on a quarterly basis.	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
627	**6.** The fixed siren portion of Public Alert and Notification System (PANS) SHALL be tested and verified operational on a weekly and monthly basis.	**PI Annex, Section F.3** ANS silent testing is completed on a weekly frequency and activation testing is completed on a monthly frequency.	The Plan aligns wording between the three existing Plans without change in practice or intent.
628	**NOTE:** These communication tests SHALL be used not only to check the equipment operation but also that the various phone numbers and links are correct and 2-way communication can be established.	**Section F.3** Communications tests will be conducted and documented on the frequency specified below. The tests include provisions to ensure participants in the test are able to understand the content of the messages in the test. Systems used to communicate from the MCR, TSC, and EOF to NRC Headquarters and NRC Regional Office Operations Center are tested monthly.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
629	**8.2 Review and Updating of the Plan and Procedures**		
630	The Plant Manager has authority and responsibility for the Prairie Island Emergency Plan and the Emergency Plan Implementing Procedures.	**Section P.2** The Xcel Energy Chief Nuclear Officer has the overall authority and responsibility for Xcel Energy Emergency Plan.	The Plan aligns wording between the three existing Plans without change in practice or intent.
631	The Plant Manager has the responsibility for the development and updating of the Emergency Plan, the Emergency Plan Implementing Procedures and coordination of the plan with offsite response organizations.	**Section P.3** The Xcel Energy EP Staff is responsible for the development, maintenance, review, and updating of the emergency plan and site-specific annexes, as well as the coordination of the plan with other response organizations as shown in Figure P.1	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
632	The Emergency Plan will be reviewed on an annual basis to ensure it is current according to the plant's controlled procedure program. The update will take into account changes identified during drills and exercises.	**Section P.10** The Emergency Preparedness Emergency Telephone Directory contains contact numbers for ORO, ERF, and support organizations identified in the emergency plan and implementing procedures. The directory is reviewed quarterly and updated as needed. EP staff update call out information in the ERO Notification System quarterly.	The Plan aligns wording between the three existing Plans without change in practice or intent.
633	Quarterly, all telephone numbers contained in the Emergency Plan Implementing Procedures SHALL be verified correct and updated as a result of the required communication tests.	**Section P.10** The Emergency Preparedness Emergency Telephone Directory contains contact numbers for ORO, ERF, and support organizations identified in the emergency plan and implementing procedures. The directory is reviewed quarterly and updated as needed. EP staff update call out information in the ERO Notification System quarterly.	The Plan aligns wording between the three existing Plans without change in practice or intent.
634	**8.2.1 Organization of Plan**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
635	The organization of the Emergency Plan is reviewed and updated yearly by the Emergency Preparedness Manager. Reorganization may be necessary as the result of the following:	**Section P.4** The SEP and associated documents as identified herein, are reviewed on an annual basis and updated if necessary. Changes due to regulatory revisions, issues identified by drills and exercises, or other updates will be incorporated. Agreements with supporting organizations will be reviewed and certified to be current on an annual basis and updated, if necessary. Changes to agreements may be coordinated with the annual review of the SEP. Emergency Plan changes will be processed in accordance with 10 CFR 50.54(q) requirements and fleet document control/records management procedures. ETE updates are completed in accordance with 10 CFR 50, Appendix E, IV.4, 5 & 6.	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
636	**A.** drills or exercises indicating need for changes	Same as above	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
637	**B.** changes in key personnel	Same as above	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
638	**C.** changes in the plant's organization structure	Same as above	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
639	**D.** changes in the organization of offsite response agencies	Same as above	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
640	**E.** Experience gained under actual emergency situations	Same as above	The Standard Plan maintains the commitment to provide the capability without a detailed description of the specific methodology used.
641	**8.2.2 Maintenance and Inventory of Emergency Equipment and Supplies**		
642	Radiation protection equipment at each of the emergency facilities is checked monthly for operability according to surveillance and testing program.	**Section H.11** In addition to supplies of normal use equipment and instruments, emergency kits are maintained at Xcel Energy nuclear sites. Routine quarterly inventories are performed to verify contents and operationally check equipment/instruments in accordance with site procedures.	The Plan aligns wording between the three existing Plans without change in practice or intent.
643	Emergency plan portable radiation instruments SHALL receive a Channel Check and Channel Operational Test monthly and a Channel Calibration at least every 24 months. If any emergency plan portable radiation instrument is found inoperable, then immediate actions SHALL be initiated to restore operability or replacement.	**Section H.11** In addition to supplies of normal use equipment and instruments, emergency kits are maintained at Xcel Energy nuclear sites. Routine quarterly inventories are performed to verify contents and operationally check equipment/instruments in accordance with site procedures.	The Plan aligns wording between the three existing Plans without change in practice or intent.
644	All supplies are inventoried quarterly and dated equipment and material are periodically replaced according to surveillance and testing program.	**Section H.11** In addition to supplies of normal use equipment and instruments, emergency kits are maintained at Xcel Energy nuclear sites. Routine quarterly inventories are performed to verify contents and operationally check equipment/instruments in accordance with site procedures.	The Plan aligns wording between the three existing Plans without change in practice or intent.
645	**9.0 RECOVERY**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
646	In general, the plant will be responsible for the short term recovery, that is recovery from an emergency condition in which no core damage or serious release of radioactivity to the environments has occurred.	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization.	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area.
647	If it is clear that a high potential exists for core damage and/or a serious release of radioactivity to the environment, a Recovery Phase will be activated to provide for the long-term recovery actions and for establishing support arrangements.	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization.	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area.
648	In general, before re-occupying buildings after an emergency, certain recovery criteria must be satisfied: (1) There must be assurance that the problem encountered is solved and that this same incident cannot immediately recur; (2) The general occupancy areas must be free of significant contamination; (3) Radiation areas and High Radiation areas must be properly defined; and (4) Airborne radioactivity must be eliminated or controlled.	**Section M.3** Recovery from an emergency situation is guided by the following principles: • The protection of the public health and safety is the foremost consideration in formulating recovery plans. • Public officials would be kept informed of recovery plans so that they can properly carry out their responsibilities to the public, • Periodic information would be provided to the news media so that they can provide information to the public regarding recovery plans and progress made. • Periodic status reports would be given to company employees at other locations and to government and industry representatives.	The Plan aligns wording between the three existing Plans without change in practice or intent.
649	**9.1 Investigation of Incidents**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
650	All incidents SHALL be investigated in conjunction with corporate event response procedures.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of R2 without change in practice or intent from the current approved Plan.
651	**9.2 Recovery Procedures**		
652	All recovery operations SHALL be performed in accordance with written procedures. These procedures SHALL include the following activities:	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
653	**A.** Investigation of the cause of the incident.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
654	**B.** Investigation of plant conditions following an accident.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
655	**C.** Repair and restoration of facilities.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
656	**D.** Testing and startup of restored facilities.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
657	Methods for determining the extent of radioactive contamination and general protective measures to be taken for personnel performing recovery operations are established in Section F2, Radiation Safety, of the Operations Manual, and in the Radiation Protection Manual, RPIP's.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
658	Written procedures for recovery of the facility from the specific post accident conditions will be prepared by qualified plant staff members and submitted to the Plant Operating Review Committee. Plant Operating Review Committee approval of all such procedures is required prior to their initiation.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
659	**9.3 Criteria for Resumption of Operations**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
660	If the plant is shutdown as the result of an emergency, it will be restarted only when:	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
661	**A.** The conditions which caused the emergency are corrected.	Same as above	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
662	**B.** The cause of the emergency is understood.	Same as above	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
663	**C.** Restoration, repair and testing is completed as required.	Same as above	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
664	**D.** No unreviewed safety questions exist.	Same as above	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
665	**E.** All conditions of the license and technical specifications are satisfied.	Same as above	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
666	**9.4 Transition to Recovery**		
667	If it is clear that extensive plant damage exists and contamination of plant systems have occurred, then a recovery phase may be necessary.	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization.	The Plan aligns wording between the three existing Plans without change in practice or intent.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
668	Transition to the recovery phase will take place in an incremental manner as the functions change from operational to engineering/construction. The decision to make the transition from the emergency phase to the recovery phase should be a joint decision by the ED and EM. The Recovery Manager should possess the qualifications of an Emergency Manager. This position should be occupied by personnel representing the company executive level.	**Section M.3** Implementing procedures provide guidance to directly terminate from an Unusual Event and Alert classification levels when a normal outage organization is able to address any plant issues, or to transition to a recovery organization. The Emergency Director in consultation with the Emergency Manager, determines when conditions warranting an emergency declaration have passed and steps will be taken to terminate directly from the event or transition to a recovery organization.	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
669	Should transition to the recovery phase become necessary, the site engineering/construction staff would provide the nucleus of the organization.	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization.	The Plan aligns wording between the three existing Plans without change in practice or intent.
670	This plant staff would be augmented as required by specialists from the site organization and the offsite support groups. In addition, appropriate assistance would be secured from the Architect-Engineer and the NSSS vendor organizations.	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization. **Figure M.2-1**	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
671	This support could be broadened as required by consultant help from the several organizations familiar with Prairie Island NGP's organization. The overall organization envisioned for a substantial Recovery Phase would be a blend of site staff, and appropriate vendor and consultant personnel.	**Section M.2** Figure M.2-1 illustrates the Recovery Organization structure. Recovery activities are required for the transition from a Site Area Emergency with long-term plant damage or General Emergency classification to an outage organization.**Figure M.2-1**	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
672	On a prior basis it is counterproductive to define in detail the extensive organization that might be involved in a sizable Recovery Phase because of the unlimited variation of conditions that could result from plant emergencies. However, the nucleus organization has been identified together with guidelines on how the organization might be expanded to meet the requirements demanded at the time.	No equivalent statement	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
673	When the Emergency Manager and Emergency Director agree that the onsite emergency condition has been terminated, a complete transfer of the responsibilities for offsite support may be made to the Recovery Organization. The EOF would then become the Recovery Center and function as Command Center for the Recovery Organization and the recovery effort. Details of Recovery Organization activation and implementing criteria are contained in the Emergency Plan Implementing Procedures.	**Section M.3** The Emergency Director in consultation with the Emergency Manager, determines when conditions warranting an emergency declaration have passed and steps will be taken to terminate directly from the event or transition to a recovery organization.	NUREG-0654, Revision 2, significantly revised the overall recovery/re-entry elements causing a refocus on language in the area. The Standard Plan was submitted to align with the elements of NUREG-0654, Revision 2, without change in practice or intent from the current approved Plan.
674	**Attachment A Emergency Plan Implementing Procedures**		
675	**A.1 PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURES**		
676	The following is a listing of F3 procedures (Emergency Plan Implementing Procedures) which SHALL be used by plant emergency organization personnel to implement the emergency plan. This may not be a complete detailed procedure list but is meant to serve as a basis for procedure development.	**Table P.7-1, List of EPIPs**	The Plan aligns wording between the three existing Plans without change in practice or intent.
677	Table A-1 Cross Reference	No equivalent statement	
678	**A.2 EOF EMERGENCY PLAN IMPLEMENTING PROCEDURES**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
679	The following is a listing of F8 procedures (EOF Emergency Plan Implementing Procedures) which SHALL be used by EOF emergency organization personnel to implement the emergency. This may not be a complete detailed procedure list but is meant to serve as a basis for procedure development.	**Table P.7-1, List of EPIPs**	The Plan aligns wording between the three existing Plans without change in practice or intent.
680	Table A-2 Cross Reference	No equivalent statement	The Standard Plan was developed to specifically align with the elements of NUREG-0654, Revision 2. The Plan structure itself provides the cross reference.
681	**Attachment B Summary of Emergency Supplies**		
682	1. Old Receiving Warehouse Locker and Emergency Vehicle Field Survey Kits	No equivalent statement	The Standard Plan retains the commitment to perform the function in the specific area of performance for the gear specified. Specific equipment and/or means of performing that function are not specified.
683	A. Beta Gamma Survey Meters B. Offsite Sample Kits (2) 1. Airborne Sample Equipment (Particulate, Iodine, Gaseous) 2. Liquid Sample Equipment C. Personnel Dosimetry D. Portable Communication Radios E. Foul weather gear F. Protective clothing G. Potassium Iodide Potassium Iodide (KI)	No equivalent statement	The Standard Plan retains the commitment to perform the function in the specific area of performance for the gear specified. Specific equipment and/or means of performing that function are not specified.
684	**2. North Warehouse and Distribution Center Assembly Points (each location)**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
685	A. Beta Gamma Survey Meters B. Portable Communications Radio C. 1 Copy of Emergency Plan Implementing Procedures (F-3) D. Personnel Decontamination Kit E. Airborne Sample Equipment F. Small First Aid Kit G. Area Radiation Monitor H. Protective Clothing	No equivalent statement	The Standard Plan retains the commitment to perform the function in the specific area of performance for the gear specified. Specific equipment and/or means of performing that function are not specified.
686	**3. Operational Support Center**		
687	A. Beta Gamma Survey Meters B. Air Sampling Equipment (Battery and AC Powered) C. Personnel Dosimetry D. Portable Communications Radios (located in Control Room) E. Area Radiation Monitor F. Portable Lanterns and Batteries G. Copies of Emergency Plan Implementing Procedures (F-3)	No equivalent statement	The Standard Plan retains the commitment to perform the function in the specific area of performance for the gear specified. Specific equipment and/or means of performing that function are not specified.
688	H. Plant Floor Plans I. Protective Clothing (Including Waterproof) J. Respiratory Protection (SCBA's) and spare bottles K. First Aid Kit L. Continuous Air Monitor (Control Room and OSC) M. Drager Toxic Chemical Air Sampler N. Full Face Respirators and Iodine Canisters	No equivalent statement	The Standard Plan retains the commitment to perform the function in the specific area of performance for the gear specified. Specific equipment and/or means of performing that function are not specified.
689	**4. Technical Support Center**		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
690	A. Beta Gamma Survey Meters B. Airborne Sampling Equipment C. Personnel dosimetry D. Portable Communications Radio E. Area Radiation Monitor F. Continuous Air Monitor G. Copies of Emergency Plan Implementing Procedures (F-3) H. Protective Clothing I. Respiratory Protection (SCBA's) and spare bottles J. Plant Floor Plans K. Potassium Iodide (KI) Distribution	No equivalent statement	The Standard Plan retains the commitment to perform the function in the specific area of performance for the gear specified. Specific equipment and/or means of performing that function are not specified.
691	**5. Red Wing Fire Station**		
692	**A. Personnel Dosimetry**		
693	**6. Mayo Clinic Health System**		
694	A. Beta Gamma Survey Meters B. Personnel dosimetry C. Copy of Operations Manual F-4 D. Supplies (Disposable clothing, solid waste containers, and liquid waste containers)	No equivalent statement	The Standard Plan retains the commitment to perform the function in the specific area of performance for the gear specified. Specific equipment and/or means of performing that function are not specified.
695	7. Hot Cell		
696	A. Beta Gamma Survey Meters B. Protective clothing C. Alpha Survey Meter D. Sample team communication gear E. Copy of Emergency Plan Implementing Procedure (F-3)	No equivalent statement	The Standard Plan retains the commitment to perform the function in the specific area of performance for the gear specified. Specific equipment and/or means of performing that function are not specified.
697	8. Fire Brigade Dress Out Area		
698	A. Self-Contained Breathing Apparatus		
699	9. Emergency Operations Facility		

	Current PINGP Emergency Plan Revision 58	Standard Emergency Plan or PI Annex Description	Justification
700	A. Beta Gamma Survey Meters B. Offsite Sample Kit (1) 1. Airborne Sampling Equipment (Particulate, Iodine, Gaseous) 2. Liquid Sampling Equipment C. Personnel Dosimetry D. Airborne Sampling Equipment (Local) E. Portable Communication Radios F. Personnel Decontamination Kit G. Area Radiation Monitor H. Continuous Air Monitor I. GEM detector for Isotopic Analysis of Samples J. Decontamination Shower K. Potassium Iodide (KI) Distribution	No equivalent statement	The Standard Plan retains the commitment to perform the function in the specific area of performance for the gear specified. Specific equipment and/or means of performing that function are not specified.
701	**Attachment C NUREG-0654/PI E-Plan Cross Reference**	No equivalent statement	
702	**Table 11 Significant Changes From the Previous Revision**	Appendix D – Changes from Previous Revision	Revision Summary maintained with appropriate Appendix identifier.

Enclosure 3, Attachment 4

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

Prairie Island Nuclear Generating Plant
ERO Change Summary

Technical Support Center (TSC) Position Changes		
Current Position	**Proposed Position**	**Change**
Assembly Point Coordinator	None	Position removal discussed below
Operations Group Leader	Operations Coordinator	Title change only
Operations Group Leader Assistant	None	Position removal discussed below
Security Group Leader	Security Coordinator	Title change only
Radiological Emergency Coordinator	Radiological Assessment Coordinator	Title change only
REC Assistant	None	Position removal discussed below
None	Field Monitoring Teams (FMT)	Position relocated from EOF to TSC
TSC Coordinator	TSC Manager	Title change only
TSC Coordinator Assistant	None	Position removal discussed below
Maintenance Group Leader	Maintenance Coordinator	Title change only
Engineering Group Leader	Engineering Coordinator	Title change only
Logistic Support Leader	None	Position removal discussed below
Status Board Keeper	None	Position removal discussed below
Emergency Response Computer System (ERCS) Operator	None	Position removal discussed below
Record Log Keeper	None	Position removal discussed below
Switchboard Operator	None	Position removal discussed below
Operational Support Center (OSC) Position Changes		
Current Position	**Proposed Position**	**Change**
Chemistry Technicians	None	Position removal discussed below
OPS Advisor	None	Position removal discussed below
Rad Status Communicator	None	Position removal discussed below
Status Board Keeper	None	Position removal discussed below

Emergency Operations Facility (EOF) Position Changes		
Current Position	**Proposed Position**	**Change**
Recovery Manager	None	Position removal discussed below
Radiation Protection Support Supervisor (RPSS)	Radiological Assessment Coordinator (RAC)	Title change only
RPSS Assistant State Liaison	None	Position removal discussed below
RPSS Assistant Field Team and Dose Assessment	None	Position removal discussed below
Rad Status Board Keeper	None	Position removal discussed below
Count Room Chemistry Technician	None	Position removal discussed below
EOF Radiation Monitoring RP Specialist or Chemistry Technician	None	Position removal discussed below
Field Teams and Drivers	None	Position relocated from EOF to TSC
Sample Couriers	None	Position removal discussed below
EOF Coordinator Assistant	None	Position removal discussed below
Administrative Support Lead	None	Position removal discussed below
Administrative Support Staff	None	Position removal discussed below
Technical Support Supervisor	None	Position removal discussed below
Engineering Support Team Lead	None	Position removal discussed below
Lead Electrical Engineer	None	Position removal discussed below
Lead Mechanical Engineer	None	Position removal discussed below
Status Board Keeper	None	Position removal discussed below
Trending Team Leader	None	Position removal discussed below
ERCS Operator	None	Position removal discussed below
Event Status Board Keeper	None	Position removal discussed below
Technical Corporate Communicator (EOF-JIC)	None	Position removal discussed below
ENS Communicator	None	Position removal discussed below
EOF Narrative Log Keeper	None	Position removal discussed below
Offsite ERO/Joint Information Center (JIC) Position Changes		
Current Position	**Proposed Position**	**Change**
Director of Communications	JIC Manager	Title change only
Technical Resource Staff	Technical Advisor	Title change only
Emergency Planning County Liaisons	County Liaison	Title change only
Security Advisor at the State Emergency Operations Center	Security Advisor	Title change only

TSC ERO Position Change Summary	
Current Performer / Functions	**Proposed Performer / Functions**
Assembly Point Coordinator - Coordinate Activities at the Assembly Point	**None**

Change: Removal of the Assembly Point Coordinator as an ERO position in the TSC

Justification:
This position was previously identified in the Emergency Plan ERO block diagram. The responsibilities described in the Emergency Plan for this position included coordination of activities at the Assembly Point located outside the Protected Area. This is an administrative function and will continue to be performed in accordance with implementing procedures. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Operations Group Leader Assistant - Assist the Operations Group Leader as needed	**None**

Change: Removal of the Operations Group Leader Assistant as an ERO position in the TSC

Justification:
The proposed change removes the reference to the Operations Group Leader Assistant as a 60-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram. Operations support needs will be initially addressed in the TSC by the Operations Coordinator who is a TSC minimum staff position with a 60-minute response time. Additional Operations support in the TSC will continue to be provided as needed in accordance with implementing procedures. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Radiological Emergency Coordinator (REC) Assistant - Assist the REC as needed	**None**

Change: Removal of the Radiological Emergency Coordinator Assistant as an ERO position in the TSC

Justification:
The proposed Emergency Plan change removes reference to the Radiological Emergency Coordinator (REC) Assistant as a 60-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram. Radiological oversight needs will be provided in the TSC by the Radiological Assessment Coordinator who is a TSC minimum staff position with a 60-minute response time. Additional Radiological support in the TSC will continue to be provided as needed in accordance with implementing procedures. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
None	**Field Monitoring Teams** - Support Field Teams

Change: Relocation of Field Monitoring Teams ERO position from the EOF to the TSC

Justification:
The proposed Emergency Plan relocates the Field Monitoring Team ERO positions from the EOF to the TSC. This position was previously identified in the Emergency Plan ERO block diagram for the EOF. The proposed Emergency Plan depicts the Field Monitoring Team ERO positions in the TSC block diagram with one team responding at 60 minutes and a second team responding at 90 minutes.

There is no loss of capability associated with this function as a result of the proposed change since.

Current Performer / Functions	Proposed Performer / Functions
TSC Coordinator Assistant - Assist the TSC Coordinator as needed	**None**

Change: Removal of the TSC Coordinator Assistant as an ERO position in the TSC

Justification:
The proposed Emergency Plan change removes reference to the TSC Coordinator Assistant as a 60-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram. TSC facility coordination will be provided by the TSC Manager who has a 90-minute response time. Additional TSC facility coordination support will continue to be provided as needed in accordance with implementing procedures. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Work Management Leader - Coordinate Work Management support needs	**None**

Change: Removal of the Work Management Leader as an ERO position in the TSC

Justification:
The proposed Emergency Plan change removes reference to the Work Management Leader as a 60-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram. Coordination of maintenance activities will be provided by the Maintenance Coordinator which is a 90-minute response position in the TSC. Work Management support will continue to be provided as needed in accordance with implementing procedures. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Logistics Support Leader - General logistics support oversight	**None**

Change: **Removal of the Logistics Support Leader as an ERO position in the TSC**

Justification:
The proposed Emergency Plan change removes reference to the Logistics Support Leader as a 60-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram. The actions for providing logistics support are directed in accordance with implementing procedures. Logistics support is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Emergency Response Computer System (ERCS) Operator - Operation of ERCS Displays	**None**

Change: **Removal of the ECRS Operator as an ERO position in the TSC**

Justification:
The proposed Emergency Plan change removes reference to the Emergency Response Computer System (ERCS Operator) as a 60-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram under Logistic Support. The guidance for operation of the ERCS displays is provided in implementing procedures. ERCS information is available to the ERO members in the TSC via their respective computers. Support for operating ERCS displays in the facility is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Status Board Keeper - Maintaining Status Boards	**None**

Change: **Removal of the Status Board Keeper as an ERO position in the TSC**

Justification:
The proposed Emergency Plan change removes reference to the Status Board Keeper as a 60-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram under Logistic Support. Maintenance of status boards is directed in accordance with implementing procedures. Support for maintaining status boards is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change since.

Current Performer / Functions	Proposed Performer / Functions
Record Log Keeper - Maintaining Logs	**None**

Change: Removal of the Record Log Keeper as an ERO position in the TSC

Justification:
The proposed Emergency Plan change removes reference to the Record Log Keeper as a 60-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram under Logistic Support. Log keeping is directed in accordance with implementing procedures. Support for log keeping is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Switchboard Operator - Operate Switchboard	**None**

Change: Removal of the Switchboard Operator as an ERO position in the TSC

Justification:
The proposed Emergency Plan change removes reference to the Switchboard Operator as a 60-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram under Logistic Support. As a result of technological improvements to the Xcel Energy/Prairie Island telephone system, the Switchboard Operator position is no longer needed. There is no corresponding TSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

OSC ERO Position Changes	
Current Performer / Functions	**Proposed Performer / Functions**
Chemistry Technicians - Chemistry - Radiochemistry	**None**

Change: Removal of the Chemistry Technicians as ERO positions in the OSC

Justification
The proposed Emergency Plan change removes reference to the Chemistry Technician as a 60-minute response ERO position in the OSC. This position was previously identified in the Emergency Plan ERO block diagram. Chemistry activities are managed through department procedure as required by site Technical Specifications. This position is being removed from the ERO as it does not perform an EP function as described in current regulatory guidance. Chemistry functions will continue to be performed at the site in accordance with Technical Specification requirements. There is no corresponding OSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
OPS Advisor - Provide assistance to the OSC Coordinator in an advisory capacity	**None**

Change: Removal of the OPS Advisor as an ERO position in the OSC

Justification

The proposed Emergency Plan change removes reference to the OPS Advisor as a 60-minute response ERO position in the OSC. This position was previously identified in the Emergency Plan ERO block diagram. Implementing procedures direct the TSC Operations Coordinator to direct staffing of this position from the pool of available pool of operations personnel. This position will continue to be filled in accordance with implementing procedures but will no longer be designated as a 60-minute responder. The TSC Operations Coordinator and on-shift operations personnel will provide advisory support to the OSC Coordinator until this position is filled from the Operations pool personnel. There is no corresponding OSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Rad Status Communicator - Facilitate Communication of radiological information between facilities	**None**

Change: Removal of the Rad Status Communicator as an ERO position in the OSC

Justification

The proposed Emergency Plan change removes reference to the Rad Status Communicator as a 60-minute response ERO position in the OSC. This position was previously identified in the Emergency Plan ERO block diagram. The proposed Emergency Plan maintains the Emergency Response Facility (ERF) Communicators in the EOF, TSC and OSC which will facilitate the transfer of information between ERFs to include radiological information as needed. Additional facility communication support will continue to be provided as needed in accordance with implementing procedures. There is no corresponding OSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Status Board Keeper - Maintaining Status Boards	**None**

Change: Removal of the Status Board Keeper as an ERO position in the OSC

Justification

The proposed Emergency Plan change removes reference to the Status Board Keeper as a 60-minute response ERO position in the OSC. This position was previously identified in the Emergency Plan ERO block diagram. Maintenance of status boards is directed in accordance with implementing procedures. Support for maintaining status boards is administrative in nature and will continue to be provided as needed will continue to be provided as needed in accordance with implementing procedures implementing procedures. There is no corresponding OSC position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change since.

EOF ERO Position Change Summary	
Current Performer / Functions	**Proposed Performer / Functions**
Recovery Manager - Management of Recovery Phase activities	**None**

Change: Removal of Recovery Manager as an ERO position in the EOF

Justification

The proposed Emergency Plan change removes reference to the Recovery Manager as a 90-minute response ERO position in the EOF. This position was previously identified in the Emergency Plan ERO block diagram. As described in the Emergency Plan, the Recovery Phase is initiated upon termination of the emergency classification therefore this position is not necessary to support initial EOF emergency response efforts. The Recovery Manager position will continue to be staffed at the appropriate time to support Recovery Phase activities in accordance with the Emergency Plan and implementing procedures. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
RP Support Supervisor Assistant - State Liaison - Assist RP Support Supervisor with State Liaison activities	**None**

Change: Removal of RP Support Supervisor Assistant State Liaison as an ERO position in the EOF

Justification:

The proposed Emergency Plan change removes reference to the RP Support Supervisor Assistant - State Liaison as a 90-minute response ERO position in the EOF. This position was previously identified in the Emergency Plan ERO block diagram. Radiological oversight, to include State Liaison activities, will be provided in the EOF by the Radiological Assessment Coordinator who is an EOF minimum staff position with a 90-minute response time. Additional Radiological support in the EOF will be provided as needed in accordance with implementing procedures. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
RP Support Supervisor Assistant - Field Team and Dose Assessment - Assist RP Support Supervisor with oversight of Field Team and Dose Assessment	**None**

Change: Removal of RP Support Supervisor Assistant Field Team and Dose Assessment as an ERO position in the EOF

Justification:

The proposed Emergency Plan change removes reference to the RP Support Supervisor Assistant - Field Team and Dose Assessment as a 90-minute response ERO position in the EOF. This position was previously identified in the Emergency Plan ERO block diagram. Radiological oversight, to include field team and dose assessment activities, will be provided in the EOF by the Radiological Assessment Coordinator who is an EOF minimum staff position with a 90-minute response time. Additional Radiological

Current Performer / Functions	Proposed Performer / Functions
support in the EOF will be provided as needed in accordance with implementing procedures. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1. There is no loss of capability as a result of the proposed change	

Current Performer / Functions	Proposed Performer / Functions
Rad Status Board Keeper - Maintain Radiological Status Board	**None**
Change: Removal of Rad Status Board Keeper as an ERO position in the EOF **Justification:** The proposed Emergency Plan change removes reference to the Rad Status Board Keeper as a 90-minute response ERO position in the EOF. This position was previously identified in the Emergency Plan ERO block diagram. Maintenance of status boards is directed in accordance with implementing procedures. Support for maintaining status boards is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1. There is no loss of capability associated with this function as a result of the proposed change since.	

Current Performer / Functions	Proposed Performer / Functions
Count Room Chemistry Technician - Operation of EOF Counting Room	**None**
Change: Elimination of Count Room Chemistry Technician as an ERO position in the EOF **Justification:** The proposed Emergency Plan change removes reference to the Count Room Chemistry Technician as a 90-minute response ERO position in the EOF. This position was previously identified in the Emergency Plan ERO block diagram. The proposed Emergency Plan replaces the Prairie Island Nuclear Generating Plant EOF with a common Xcel Energy EOF, located at the corporate office in Minneapolis Minnesota, serving Prairie Island Nuclear Generating Plant and Monticello Nuclear Generating Plant. The new EOF is greater than 25 miles from either plant as such it will not have a Count Room; therefore, there will be no need for a Count Room Chemistry Technician position in the EOF ERO. Samples will continue to be counted at the Count Room for the respective sites. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1. There is no loss of capability associated with this function as a result of the proposed change since.	

Current Performer / Functions	Proposed Performer / Functions
Radiation Monitoring RP Specialist or Chemistry Technician - Radiological monitoring of the EOF	**None**

Change: Removal of Radiation Monitoring RP Specialist or Chemistry Technician as an ERO position in the EOF

Justification:
The proposed Emergency Plan change removes reference to the Radiation Monitoring RP Specialist or Chemistry Technician as a 90-minute response ERO position in the EOF. This position was previously identified in the Emergency Plan ERO block diagram. The proposed Emergency Plan replaces the Prairie Island Nuclear Generating Plant EOF with a common Xcel Energy EOF, located at the corporate office in Minneapolis Minnesota, serving Prairie Island Nuclear Generating Plant and Monticello Nuclear Generating Plant. The new EOF is greater than 25 miles from either plant as such it will be outside the EPZ and will not require radiological monitoring for the EOF. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change since.

Current Performer / Functions	Proposed Performer / Functions
Field Teams and Drivers - Support Field Teams drivers	**None**

Change: Relocation of Field Monitoring Teams ERO position from the EOF to the TSC

Justification:
The proposed Emergency Plan relocates the Field Monitoring Team ERO positions from the EOF to the TSC. This position was previously identified in the Emergency Plan ERO block diagram for the EOF. The proposed Emergency Plan depicts the Field Monitoring Team ERO positions in the TSC block diagram with one team responding at 60 minutes and a second team responding at 90 minutes.

There is no loss of capability associated with this function as a result of the proposed change since.

Current Performer / Functions	Proposed Performer / Functions
Sample Courier - Transport of samples to the EOF Count Room	**None**

Change: Removal of Sample Courier as an ERO position in the EOF

Justification:
The proposed Emergency Plan change removes reference to the Sample Courier as a 90-minute response ERO position in the EOF. This position was previously identified in the Emergency Plan ERO block diagram. The proposed Emergency Plan replaces the Prairie Island Nuclear Generating Plant EOF with a common Xcel Energy EOF, located at the corporate office in Minneapolis Minnesota, serving Prairie Island Nuclear Generating Plant and Monticello Nuclear Generating Plant. The new EOF will not have a Count Room therefore, there will be no need for a sample courier position in the EOF ERO. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change since.

Current Performer / Functions	Proposed Performer / Functions
EOF Coordinator Assistant - General logistics support and assisting the EOF Coordinator	**None**

Change: Removal of EOF Coordinator Assistant as an ERO position in the EOF

Justification:
The proposed Emergency Plan change removes reference to the EOF Coordinator Assistant as a 90-minute response ERO position in the EOF. This position was previously identified in the Emergency Plan ERO block diagram. TSC facility coordination will be provided by the EOF Manager who has a 90-minute response time. Additional EOF facility coordination support will continue to be provided as needed in accordance with implementing procedures. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Administrative Support Lead - Coordinate administrative support for the EOF	**None**

Change: Removal of Administrative Support Lead as an ERO position in the EOF

Justification:
The proposed Emergency Plan change removes reference to the Administrative Support Lead as a 90-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram. Administrative support will continue to be provided as needed in accordance with implementing procedures. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Administrative Support Staff - Provide administrative support to the EOF	**None**

Change: Removal of Administrative Support Staff as an ERO position in the EOF

Justification:
The proposed Emergency Plan change removes reference to the Administrative Support Staff as a 90-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram. Administrative support will continue to be provided as needed in accordance with implementing procedures. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Technical Support Supervisor - Oversight EOF Technical Support Group	**None**

Change: **Removal of Technical Support Supervisor as an ERO position in the EOF**

Justification:
The proposed Emergency Plan change removes reference to the Technical Support Supervisor as a 90-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram. The proposed Emergency Plan replaces the Prairie Island Nuclear Generating Plant EOF with a common Xcel Energy EOF, located at the corporate office in Minneapolis Minnesota, serving Prairie Island Nuclear Generating Plant and Monticello Nuclear Generating Plant. The common EOF functions are focused on coordination of offsite emergency response activities to include State and local notifications, offsite dose projections, Protective Action Recommendations (PARs), and interface with Offsite Response Organizations and as such will not include a Technical Support Group. Technical support for the station continues to be provided by technical support ERO positions in the TSC. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Engineering Support Team Lead - Coordination EOF Engineering Support Personnel	**None**

Change: **Removal of Engineering Support Team Lead as an ERO position in the EOF**

Justification:
The proposed Emergency Plan change removes reference to the Engineering Support Team Lead as a 90-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram. The proposed Emergency Plan replaces the Prairie Island Nuclear Generating Plant EOF with a common Xcel Energy EOF, located at the corporate office in Minneapolis Minnesota, serving Prairie Island Nuclear Generating Plant and Monticello Nuclear Generating Plant. The common EOF functions are focused on coordination of offsite emergency response activities to include State and local notifications, offsite dose projections, Protective Action Recommendations (PARs), and interface with Offsite Response Organizations and as such will not include an Engineering Support Group. Engineering support for the station continues to be provided by technical support ERO positions in the TSC. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Lead Electrical Engineer - Provide electrical engineering support in the EOF	**None**

Change: **Removal of Lead Electrical Engineer as an ERO position in the EOF**

Justification:
The proposed Emergency Plan change removes reference to the Lead Electrical Engineer as a 90-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram. The proposed Emergency Plan replaces the Prairie Island Nuclear Generating Plant EOF with a common Xcel Energy EOF, located at the corporate office in Minneapolis Minnesota, serving Prairie Island Nuclear Generating Plant and Monticello Nuclear Generating Plant. The common EOF functions are focused on coordination of offsite emergency response activities to include State and local notifications, offsite dose projections, Protective Action Recommendations (PARs), and interface with Offsite Response Organizations and as such will not include an Engineering Support Group. Engineering support for the station continues to be provided by technical support ERO positions in the TSC. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Lead Mechanical Engineer (EOF) - Provide mechanical engineering support in the EOF	**None**

Change: **Removal of Lead Mechanical Engineer as an ERO position in the EOF**

Justification:
The proposed Emergency Plan change removes reference to the Lead Mechanical Engineer as a 90-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram. The proposed Emergency Plan replaces the Prairie Island Nuclear Generating Plant EOF with a common Xcel Energy EOF, located at the corporate office in Minneapolis Minnesota, serving the Prairie Island Nuclear Generating Plant and Monticello Nuclear Generating Plant. The common EOF functions are focused on coordination of offsite emergency response activities to include State and local notifications, offsite dose projections, Protective Action Recommendations (PARs), and interface with Offsite Response Organizations and as such will not include an Engineering Support Group. Engineering support for the station continues to be provided by technical support ERO positions in the TSC. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Status Board Keeper - Maintain Status Board	**None**

Change: **Removal of Status Board Keeper as an ERO position in the EOF**

Justification:
The proposed Emergency Plan change removes reference to the Status Board Keeper as a 90-minute response ERO position in the EOF. This position was previously identified in the Emergency Plan ERO block diagram. Maintenance of status boards is directed in accordance with implementing procedures. Support for maintaining status boards is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change since.

Current Performer / Functions	Proposed Performer / Functions
Trending Team Leader - Provide plant trend data as part of the Technical Support Group	**None**

Change: **Removal of Trending Team Leader as an ERO position in the EOF**

Justification:
The proposed Emergency Plan change removes reference to the Trending Team Leader as a 90-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram as part of the Technical Support Group staff. The proposed Emergency Plan replaces the Prairie Island Nuclear Generating Plant EOF with a common Xcel Energy EOF, located at the corporate office in Minneapolis Minnesota, serving Prairie Island Nuclear Generating Plant and Monticello Nuclear Generating Plant. The common EOF functions are focused on coordination of offsite emergency response activities to include State and local notifications, offsite dose projections, Protective Action Recommendations (PARs), and interface with Offsite Response Organizations and as such will not include Technical Support Group. Technical support for the station continues to be provided by technical support ERO positions in the TSC. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
ERCS Operator - Operation of ERCS Displays	**None**
Change: Removal of ERCS Operator as an ERO position in the EOF **Justification:** The proposed Emergency Plan change removes reference to the Emergency Response Computer System (ERCS Operator) as a 90-minute response ERO position in the EOF. This position was previously identified in the Emergency Plan ERO block diagram under Logistic Support. The guidance for operation of the ERCS displays is provided in implementing procedures. ERCS information is available to the ERO members in the TSC via their respective computers. Support for operating ERCS displays in the facility is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1. There is no loss of capability associated with this function as a result of the proposed change.	

Current Performer / Functions	Proposed Performer / Functions
Event Status Board Keeper - Maintain Event Status Board	**None**
Change: Removal of Event Status Board Keeper as an ERO position in the EOF **Justification:** The proposed Emergency Plan change removes reference to the Event Status Board Keeper as a 90-minute response ERO position in the EOF. This position was previously identified in the Emergency Plan ERO block diagram. Maintenance of status boards is directed in accordance with implementing procedures. Support for maintaining status boards is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1. There is no loss of capability associated with this function as a result of the proposed change since.	

Current Performer / Functions	Proposed Performer / Functions
Technical Corporate Communicator - Relay Technical information between the EOF and the JIC	**None**

Change: **Elimination of Technical Corporate Communicator as an ERO position in the EOF**

Justification:
The proposed Emergency Plan change removes reference to the Technical Corporate Communicator as a 90-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram under the Technical Support Group. The proposed Emergency Plan replaces the Prairie Island Nuclear Generating Plant EOF with a common Xcel Energy EOF, located at the corporate office in Minneapolis Minnesota, serving Prairie Island Nuclear Generating Plant and Monticello Nuclear Generating Plant. The common EOF functions are focused on coordination of offsite emergency response activities to include State and local notifications, offsite dose projections, Protective Action Recommendations (PARs), and interface with Offsite Response Organizations and as such will not include a Technical Support Group. The proposed Emergency Plan maintains the ERF Communicators in the EOF, TSC and OSC which will facilitate the transfer of information between ERFs and will also be available to provide information to the JIC as needed. Additional ERF communications support will be provided as needed in accordance with implementing procedures. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
ENS Communicator - Perform NRC notifications/communications	**None**

Change: **Removal of ENS Communicator as an ERO position in the EOF**

Justification:
The proposed Emergency Plan change removes reference to the ENS Communicator as a 90-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram. The proposed Emergency Plan replaces the Prairie Island Nuclear Generating Plant EOF with a common Xcel Energy EOF, located at the corporate office in Minneapolis Minnesota, serving Prairie Island Nuclear Generating Plant and Monticello Nuclear Generating Plant. The common EOF functions are focused on coordination of offsite emergency response activities to include State and local notifications, offsite dose projections, Protective Action Recommendations (PARs), and interface with Offsite Response Organizations. NRC notifications will continue to be performed first by the Control Room and then transferred to the TSC and will remain in the TSC rather than transferring to the EOF. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Current Performer / Functions	Proposed Performer / Functions
Narrative Log Keeper - Maintain logs	**None**

Change: **Removal of Narrative Log Keeper as an ERO position in the EOF**

Justification:
The proposed Emergency Plan change removes reference to the Narrative Log Keeper as a 90-minute response ERO position in the TSC. This position was previously identified in the Emergency Plan ERO block diagram under Logistic Support. Log keeping is directed in accordance with implementing procedures. Support for log keeping is administrative in nature and will continue to be provided as needed in accordance with implementing procedures. There is no corresponding EOF position identified in NUREG-0654, Revision 2, Table B-1.

There is no loss of capability associated with this function as a result of the proposed change.

Enclosure 3, Attachment 5

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

Prairie Island Nuclear Generating Plant
Communications Methods and Interfaces Comparative Table

Communications Methods and Interfaces Comparative Table
Prairie Island

Communication Methods

Current	Proposed	Basis
Email Facsimile	Facsimile and /or Scan/Email	No change
Plant Phone Network Sound Powered Phones	Plant/Xcel Energy Phones	Updated to reflect changes for in-plant communications as technologies/coverages have improved.
Portable Cellular Telephone Personal Pagers	Mobile Devices	Use of generic title for ease of reference.
Plant Page System	Plant Page System	No Change
NAWAS	NAWAS	No Change
USNRC ENS USNRC HPN USNRC MCL, RSCL, PMCL, LAN	USNRC Communications	Renamed as a category of available communications for any NRC Systems. Removed reference to FTS to permit flexibility per recent NRC generic communications.
Xcel Energy Metro Radio System Plant Radio System	Xcel Energy Radio Network	Renamed to reflect improvements in Xcel Energy system radio capability.
Auto Ring Direct Dialing	Auto Ring Direct Dialing	No Change
ERO Auto Dial System	ERO Notification System	No Change
NONE	Commercial Telephones	Added to reflect availability for use in all ERFs.
NONE	Satellite Phones	Added Satellite Phone reference to Communication Table to better reflect Beyond Design Basis changes as documented in the site 10 CFR 50.54f response.
NONE	ERDS	Added ERDs to align wording between sites and for consistency.

Communications Methods and Interfaces Comparative Table
Prairie Island

Facilities/Organizations with Interfacility Communication Responsibilities

Current	Proposed	Basis
Control Room	Control Room	No Change
Technical Support Center	TSC	No Change
Ops Support Center	OSC	No Change
Emerg Op Facility	EOF	No Change
Back Up EOF	NONE	Not Applicable to Proposed Plan
Xcel Energy /System Ops	Xcel Energy System Dispatcher	No Change
Monticello NGP	Monticello NGP	No Change
PI Plant Areas	Plant Areas	No Change
PI Monitoring Teams	Field Monitoring Teams	Nomenclature updated to reflect Plan language.
PI Indian Tribe	PIIC	Nomenclature updated to reflect Plan language.
MN/HSEM-EOC	MN/HSEM-EOC	No Change
Goodhue Co. Sheriff	Goodhue Co. Sheriff	No Change
Goodhue-Red Wing EOC	Goodhue-Red Wing EOC	No Change
Dakota Co Sherrif	Dakota Co Sherrif	No Change
Dakota - EOC	Dakota Co. EOC	No Change
WI/WEM-EOC	WI/WEM-EOC	No Change
WI/WEM - Eau Claire	WI/WEM - Eau Claire	No Change
Pierce Co. Sheriff	Pierce Co. Sheriff	No Change
Pierce EOC	Pierce Co. EOC	No Change
Red Wing Police/Fire	Red Wing Police/Fire	No Change
Red Wing Hospital	Red Wing Hospital	No Change
USNRC/HQ	USNRC/HQ	No Change
USNRC/Reg III	USNRC/Reg III	No Change
USNRC/Resident Insp.	USNRC/Resident Insp.	No Change
PI Emerg. Personnel	PINGP Key Personnel	No Change
MN/State Patrol	MN/State Patrol	No Change
WI/State Patrol	WI/State Patrol	No Change
National Weather Service	National Weather Services	No Change
NONE	NRC Near Site Facility	Updated to reflect addition of facility to Standard Plan.
NONE	PINGP Alternative Facility	Updated to reflect addition of facility to Standard Plan.
NONE	PINGP Security	Updated to reflect NUREG-0654, Revision 2, separation of Security functions from EP Functions recognizing that communications between ERFs and Security force need to be maintained.

ENCLOSURE 4

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

CONSOLIDATION OF EMERGENCY OPERATIONS FACILITIES

(19 Pages Follow)

ENCLOSURE 4

NORTHERN STATES POWER COMPANY
MONTICELLO NUCLEAR GENERATING PLANT, UNIT 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

CONSOLIDATION OF EMERGENCY OPERATIONS FACILITIES

Table of Contents

CONSOLIDATION OF EMERGENCY OPERATIONS FACILITIES

1.0 SUMMARY DESCRIPTION

Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy proposes to establish a consolidated emergency operations facility (EOF) for Monticello Nuclear Generating Plant (MNGP), and Prairie Island Nuclear Generating Plant, Units 1 and 2 (PINGP). The proposed consolidated EOF will replace the existing MNGP and PINGP near-site EOFs, and their common backup EOF (BUEOF). The straight-line distance between the proposed EOF and the MNGP Technical Support Center (TSC) is approximately 37 miles and to the PINGP TSC approximately 40 miles. A license amendment to request Commission approval for locating an EOF greater than 25 miles from a nuclear power reactor site is required per 10 CFR 50, Appendix E, Section IV.E.8.b.

2.0 DETAILED DESCRIPTION

2.1 Proposed Changes

The current MNGP Emergency Plan's description of emergency response centers includes the following details:

> Section 7.1.3, Emergency Operations Facility, states: "The EOF is located within the site Training Center, 1 mile south by southeast of the plant (approximately 5 minutes driving time)."
>
> Section 7.1.5, Back-up EOF, states: "In the event the primary EOF becomes uninhabitable during a real emergency, the functions of the EOF would be transferred to the Back-up EOF."
>
> "The Back-up EOF is located at the Xcel Energy corporate office in downtown Minneapolis, …."
>
> Section 7.4.3, Back-up EOF, states: "The Back-up EOF is located at the Xcel Energy corporate office in downtown Minneapolis, …."

The current PINGP Emergency Plan's description of emergency control centers includes the following details:

> Section 7.1.3, Emergency Operations Facility, states: "The Emergency Operations Facility (EOF) is a required emergency response facility located near the plant site to provide continuous coordination and evaluation of activities during an emergency having, or potentially having, environmental consequences. … Because the EOF is located within the 10-mile EPZ [emergency planning zone], a Backup EOF exists in case an evacuation of the EOF is necessary. Equipment and facilities necessary to carry out this function are located at Xcel Energy corporate offices in downtown Minneapolis,

> Minnesota. A description of the Backup EOF facility is described in the Monticello & Prairie Island Offsite Nuclear Emergency Plan."

The current FP-EP-PLAN-01, Offsite Nuclear Emergency Plan, Section 5.3.1, description of NSPM/Xcel Energy's Offsite Facilities, includes the following details:

> Sub-section 1, Backup Emergency Operations Facility (BUEOF), states: "This facility … is located in conjunction with Xcel Energy's general offices in Minneapolis."
>
> Sub-section 2, Nearsite Emergency Operations Facility (EOF), states: "The EOF is located in the Plant Training Center which also contains administrative offices for the Training Department and the plant simulator."
>
> "For Monticello, the EOF is located approximately 1 mile south-southeast of the plant within the city of Monticello. For Prairie Island, the EOF is located approximately ½ mile west of the plant."

Xcel Energy proposes to establish a consolidated EOF to replace the existing MNGP and PINGP near-site EOFs, and their common BUEOF. The existing common BUEOF is located at the same address as the Headquarters Emergency Center in downtown Minneapolis, Minnesota which the Commission found acceptable in 1983. This location was identified as 55 miles from the Prairie Island site and 45 miles from the Monticello plan site (Reference 11). These distances were estimated based on driving routes. The proposed consolidated EOF, which will be referred to as the EOF, is in straight-line distance approximately 37 miles from the MNGP TSC and approximately 40 miles from the PINGP TSC.

The proposed Standard Emergency Plan (SEP) and its site-specific annexes, which are described by Enclosures 1-3, include the following details:

> SEP Section H.3 – An EOF is established, using current Federal guidance, as the primary base of emergency operations for the licensee during a radiological incident. The EOF facilitates the management and coordination of the overall emergency response, including the sharing of information with Federal, state, local and tribal government authorities.
>
> > The EOF is a dedicated facility located in conjunction with Xcel Energy's general offices in Minneapolis and serves as the EOF for Xcel Energy sites. Access to the EOF is controlled using electronic card readers.
> >
> > The EOF has the capability to display vital plant data and radiological information for each site and unit, in near real time, to be used by knowledgeable individuals responsible for providing technical briefings on plant conditions, event prognosis, and for management of overall emergency response.

The EOF provides reliable voice communications to each site's MCR, TSC, OSC, the NRC, and state and county warning points and EOCs.

The EOF is required to be activated within 90 minutes following the declaration of an Alert or higher classification.

Proposed SEP Section H.3.a – For an EOF that is located more than 25 miles away from the [nuclear power plant (NPP)] site, provisions are made from locating NRC and offsite responders closer to the NPP site.

The EOF is greater than 25 miles from MNGP and PINGP. Xcel Energy maintains space for members of an NRC Site Team and federal responders at a location near those sites. The location and provisions of the near-site facilities is described in the site-specific annexes.

Proposed SEP MNGP Annex Section H.3/H.3.a:

The MNGP Training Building has been designated for use as a near site location for the NRC and other off-site agency staff.

This location provides space for an NRC site team and federal responders, space for conducting briefings with emergency response personnel, communication with other licensee and offsite emergency response facilities, access to plant data and radiological information, and access to copying equipment and office supplies.

Proposed SEP PINGP Annex Section H.3/H.3.a:

The PINGP Training Center has been designated for use as a near site location for the NRC and other off-site agency staff.

This location provides space for an NRC site team and federal responders, space for conducting briefings with emergency response personnel, communication with other licensee and offsite emergency response facilities, access to plant data and radiological information, and access to copying equipment and office supplies.

Xcel Energy plans to conduct a proof-of-concept demonstration involving response to concurrent events requiring EOF activation with both MNGP and PINGP prior to implementation.

The scope of the demonstration will require response to, and coordination of, response efforts for events occurring simultaneously at MNGP and PINGP, specifically:

- Management of overall licensee emergency response,
- Coordination of radiological and environmental assessment,
- Determination of recommended public protective actions,
- Notification of the States of Minnesota and Wisconsin, and both MNGP and PINGP risk jurisdictions,

- Coordination of event, plant, and response information provided to public information staff for dissemination to the media and public,
- Staffing and activation of the facility within 90 minutes for an Alert or higher emergency class,
- Coordination of emergency response activities with Federal, State, local and tribal authorities,
- Obtaining and displaying key plant data and radiological information for the affected unit(s) at MNGP and PINGP per the demonstration scenario, and
- Analyzing plant technical information and providing technical briefings on event conditions and prognosis to licensee staff and offsite agency responders for the affected unit(s) at MNGP and PINGP per the demonstration scenario. In addition, the event at PINGP will affect multiple units.

This proof-of-concept demonstration may be observed by NRC staff and representatives of the Federal Emergency Management Agency (FEMA). Offsite response agencies will be invited to participate or observe. Logistical arrangements will be coordinated with these organizations separately.

2.2 Reason for the Proposed Changes

The proposed consolidation is expected to have the following positive effects on the affected stations' emergency response capability:

- Increased pool of site emergency response organization (ERO) members available for assignment to other positions in the TSC and the Operational Support Center (OSC).
- Increased efficiency using common practices and procedures in a single facility.
- Enhanced availability for emergency response by relocating the EOF away from a reactor site that could be affected by a large-scale external event, hostile action, or radioactivity release.

The greater distance of the proposed EOF from MNGP and PINGP does not impede implementation of EOF functions by MNGP and PINGP EROs, or the NRC. Offsite response organization (ORO) plans provide for EOF interface from their respective emergency operations centers (EOCs), primarily the Minnesota State EOC/Joint Information Center (JIC), although a representative may be sent to the proposed EOF. The Xcel Energy Executive Spokesperson represents Xcel Energy and interfaces with state officials at the Minnesota state EOC/JIC, and the State Liaison at the Minnesota State EOC/JIC serves as an interface between Xcel Energy and the states of Minnesota and Wisconsin. The EOF Offsite Agency Liaison coordinates ERO and ORO activities. Xcel Energy Field Monitoring Team (FMT) activities are coordinated with the State Planning Chief at the Minnesota State EOC. In addition, County Liaisons serve as an interface between County and Xcel Energy personnel. Thus, the location of the proposed EOF does not impede ORO mobilization. Likewise, due to the relative proximity to the Minneapolis-Saint Paul International Airport, the time it would take for the NRC Region III Incident Response Site Team to arrive at the proposed EOF should be less than that needed to

travel to the existing MNGP EOF or PINGP EOF. Additionally, the proposed consolidated EOF will obviate the need for NRC Site Teams to staff MNGP EOF and staff the PINGP EOF for concurrent events.

Although NUREG-0696, “Functional Criteria for Emergency Response Facilities” (Reference 3), stated that activation of the EOF was optional at the Alert emergency class and required at the higher emergency classification levels, current MNGP and PINGP emergency plans provide for EOF activation after an Alert or higher emergency classification is declared. The proposed SEP describes the same response protocol. During the past 20 years, the single event requiring an EOF activation for either MNGP or PINGP was the January 13, 2012, Prairie Island Alert declaration for a sodium hypochlorite leak that resulted in airborne concentrations potentially dangerous to life and health (Reference 7).

2.3 MNGP and PINGP Emergency Plan Background

Generic Letter 80-90, “Post-TMI [Three Mile Island] Requirements,” dated October 31, 1980 (Reference 5), provided NUREG-0737, “Clarification of TMI Action Plan Requirements,” and indicated additional guidance on emergency response facilities (Section III.A.1.2) would be forwarded separately.

Generic Letter 81-10, “Post-TMI Requirements for the Emergency Operations Facility,” dated February 18, 1981 (Reference 6), provided clarification of TMI Action Plan Item III.A.1.2, Upgrade Emergency Support Facilities. This letter requested confirmation that the associated implementation would be met, including submittal of conceptual design information for emergency response facilities (ERFs).

Northern States Power (NSP) Company letter, Subject: Post-TMI Requirements for the Emergency Operations Facility (Generic Letter 81-10), dated June 8, 1981 (Reference 8), provided conceptual design information and task functions of the MNGP ERFs. The conceptual design for the EOF addressed its location, size, shielding and habitability considerations. Plans for primary and backup means of communicating to outside agencies were described as well as service by dual source power supply. Availability of records and data required by EOF personnel via the emergency response instrumentation system (ERIS) were described. The conceptual design included a description of a Headquarters Emergency Center located at the NSP corporate office building that would function as the backup EOF. Its location was identified as in downtown Minneapolis, approximately 45 miles from the Monticello plant. It was anticipated that the backup EOF would be equipped to receive output from the plant Dose Assessment System to monitor dose projections. Availability of dedicated communications systems and significant plant drawings were referenced.

Northern States Power Company letter, Subject: Post-TMI Requirements for the Emergency Operations Facility (Generic Letter 81-10), dated June 8, 1981 (Reference 9), provided a general description of ERF implementation for the PINGP. The description of the planned EOF addressed its location, size, shielding and habitability considerations.

Plans for primary and backup means of communicating to outside agencies were described as well as service by dual source power supply. Availability of records and a description of EOF data displays intended to provide the full capability of the computer based Dose Assessment System were described. The description of the backup EOF was similar to that of MNGP except the location was described as being approximately 55 miles from Prairie Island. A separate figure was included that demonstrates the distance was calculated in driving miles.

Northern States Power Company letter, Subject: Emergency Operations Facilities, Generic Letter 81-10, dated January 26, 1982 (Reference 10), responded to an NRC request for additional conceptual design information for the PINGP.

NRC Letter to Northern States Power, Subject: Primary and Backup Emergency Operations Facilities, dated October 27, 1983 (Reference 11), advised that the Commission found the location of the back-up and primary EOFs for MNGP described in MNGP's letter dated June 8, 1981, and PINGP letters dated June 8, 1981, and January 26, 1982, were acceptable.

3.0 TECHNICAL EVALUATION

3.1 Functional Analysis

NUREG-0696 (as updated by NSIR/DPR-ISG-01, "Emergency Planning for Nuclear Power Plants" (Reference 4)), provides guidance for complying with 10 CFR 50, Appendix E, Section IV.E.8. The information provided in sections 3.1.1 through 3.1.9 below address this guidance to demonstrate acceptability of the proposed EOF's attributes with respect to MNGP and PINGP.

3.1.1 Functions

Management of overall licensee emergency response

Operation of the proposed EOF will not significantly alter the overall approach to emergency response at MNGP and PINGP. Exceptions include NRC notifications using the Emergency Notification System (ENS) and direct control of FMTs remaining in the TSC as noted in Attachment 1 to Enclosure 1. The Emergency Manager, who is in overall command and control for the Xcel Energy ERO, is the individual authorized to request assistance and resources from responding organizations.

Once it assumes responsibilities, the proposed EOF will be the primary facility for offsite Protective Action Recommendation (PAR) development and notification of designated offsite agencies listed in the site annexes. Responsibility for event classification, NRC notifications using the ENS, and emergency exposure controls will remain in the TSC. If the proposed EOF is unavailable, the affected site(s) have

the capability to determine PARs for the public, notify offsite agencies, and perform offsite dose assessments.

Coordination of radiological and environmental assessment

The proposed EOF will evaluate field team activities and perform dose assessments. Off-site environmental monitoring is performed by qualified field monitoring team personnel under the direction of the site's TSC Field Team Monitor (FMT). The EOF FMT Communicator monitors the status of these teams and relays information to the EOF Dose Projection Specialist and EOF Radiological Assessment Coordinator. Xcel Energy FMT activities are coordinated with environmental monitoring efforts performed by teams directed by the states of Minnesota and/or Wisconsin, via direct interface with the State Planning Chief at the Minnesota State EOC.

Communication and dose assessment capabilities are discussed in Sections 3.1.6 and 3.1.8 below, respectively.

Determination of recommended public protective actions

The ERO staff in the proposed EOF will develop and provide PARs to offsite agencies based upon plant conditions or dose projections. Unified Radiological Assessment System for Consequence Analysis (RASCAL) Interface (URI) dose projection results and field monitoring readings are used in assessing PARs. Procedures with plant-specific guidance will be used in making PARs and notification of offsite agencies. The EOF Radiological Assessment Coordinator recommends PARs to the Emergency Manager who is responsible for their approval.

Notification of offsite agencies

Upon activation of the proposed EOF, the ERO staff will make notifications to State, Tribal and local agencies for MNGP and PINGP. These messages include initial emergency classification level (ECL) declarations, upgrades in the ECL, issuance of or change to PARs, and follow-up messages. The proposed EOF has enough workstations and personnel designated to communicate with offsite agencies to support communications for more than one site during concurrent activation. Primary and back-up communications methods will be available. Communications methods are further described in Section 3.1.6.

Coordination of event, plant, and response information provided to public information staff for dissemination to the media and public

The ERO staff in the proposed EOF will provide event, plant, and response information to the Xcel Energy Executive Spokesperson and the State Liaison at the Minnesota State EOC/JIC. The State of Minnesota maintains a combined JIC/EOC

for use by Xcel Energy and the State of Wisconsin. JIC operations are unaffected by the relocation of the EOF.

Staffing and activation of the facility within time frames and at emergency classification levels defined in the licensee emergency plan

Staffing for the proposed EOF is addressed in Attachment 1 to Enclosure 1. Justification is provided to demonstrate EOF functions of command and control, communications, and management and performance of dose assessments and projections.

The proposed EOF is required to be activated within 90 minutes following the declaration of an Alert or higher classification. This time frame is the same as that of the MNGP EOF and PINGP EOF under provisions of their current emergency plans and in the proposed SEP (Attachment 1 to Enclosure 1).

Coordination of emergency response activities with Federal, State, tribal, and local agencies

The NRC is notified via the ENS immediately after notification of the designated offsite agencies listed in the site annexes, and not later than one hour after the time one of the ECLs is declared, as required by 10 CFR 50.72(a)(ii)(3). Follow-up NRC notifications are made in accordance with 10 CFR 50.72(c). Responsibility for these notifications is transferred from the affected site's Main Control Room (MCR) to its TSC where it remains for the duration of the event response. In addition, the site TSCs and the proposed EOF have the capability of establishing Health Physics Network (HPN) communications with the NRC when requested.

In the event an incident's severity or uncertainty warrants entry into the NRC expanded activation emergency response mode, it is anticipated an NRC Region III site team may be dispatched to interface with their counterparts in the proposed EOF and elsewhere, e.g., site TSC(s), JIC, Minnesota EOC. Arrangements meeting the 10 CFR 50.47(b)(3) emergency planning standard for accommodating responding organizations exists at the proposed EOF, including a separate conference room in the proposed EOF for the NRC Region III site team. The establishment of a nearsite response location for the NRC is described below.

The state and county agencies listed in the site-specific annexes are notified within 15 minutes of the initial ECL declaration and ECL upgrades. Interface between the EOF and OROs is primarily via the Minnesota State EOC/JIC. Xcel Energy staff who mobilize at the Minnesota State EOC/JIC provide interface between Xcel Energy and the states of Minnesota and Wisconsin. As indicated above, field environmental monitoring efforts are coordinated with the State Planning Chief at the Minnesota State EOC. In addition, County Liaisons provide interface between County and Xcel Energy personnel. The EOF Offsite Agency Liaison coordinates ERO and ORO activities.

Locating NRC and offsite agency staff closer to a site if the EOF is greater than 25 miles from the site

Prior to implementation of the proposed change, Xcel Energy will make provisions so NRC and offsite responders can interact face-to-face with emergency response personnel entering and leaving the nuclear power reactor site at the following locations closer to the sites:

- Monticello Training Center
- Prairie Island Training Center

These locations will include space for members of an NRC site team and federal responders (ORO plans provide for interface from their respective EOCs, primarily the Minnesota State EOC/JIC); additional space for conducting briefings with emergency response personnel; communication with other licensee and offsite emergency response facilities; access to plant data and radiological information; and access to copying equipment and office supplies. These locations are described in Sections H.3/H.3.a of the site-specific annexes.

Obtaining and displaying key plant data and radiological information for each unit or plant the EOF serves

The proposed EOF will have the capability to access key plant parameters from MNGP and PINGP Units 1 and 2 as described in Section 3.1.7 and Section 3.1.8 below.

Analyzing plant technical information and providing technical briefings on event conditions and prognosis to licensee staff and offsite agency responders for each type of unit or plant

MNGP is a General Electric Boiling Water Reactor and operates an Independent Spent Fuel Storage Installation (ISFSI) under a general license. PINGP Unit Nos. 1 and 2, are 2-loop Westinghouse pressurized water reactors, and PINGP has a separately licensed ISFSI. The ERO staff in the proposed EOF includes members who are technically qualified to analyze relevant information from the plant information systems described in Section 3.1.8 below. The proposed EOF is equipped to provide technical briefings of licensee staff and offsite agency responders. Telephone conferencing capability is available for briefing responders not located in the proposed EOF.

Effectively responding to and coordinating response efforts for events occurring simultaneously at more than one site for a consolidated EOF

The proposed consolidated EOF is capable of monitoring and analyzing events at MNGP and PINGP simultaneously. Enough workstations are available for data

retrieval and the facility has adequate display capability to simultaneously present this information to the EOF staff. The ERO augmentation process provides sufficient staff in the event both stations are in an ECL requiring EOF activation.

3.1.2 Location, structure, and habitability

The proposed EOF is in Xcel Energy's Corporate Offices at 414 Nicollet Mall, Minneapolis, Minnesota. This structure was constructed in 1964. The straight-line distances from this location to the MNGP TSC and the PINGP TSC are approximately 37 miles and 40 miles, respectively.

The proposed EOF meets the intent of the guidance in NUREG-0696 that the building be "well-engineered for the design life of plant." The structure was designed for a live wind load of 30 pounds per square foot (> 100 miles per hour) (Reference 19). The proposed EOF is in a minimal flood hazard zone, i.e., Other Areas Zone X, which is outside the 0.2% Annual Chance (500-year) flood plain (Reference 20).

There are no specific NUREG-0696 habitability criteria for an EOF located more than 10 miles from a nuclear station and a back-up facility is not required. The proposed EOF is greater than 10 miles from MNGP and PINGP. Thus, EOF functions would not be interrupted during radiation releases for which it was necessary to recommend protective actions for the public to offsite officials.

Industrial security is provided for Xcel Energy's corporate offices. Access to the proposed EOF is controlled using positive entry control.

3.1.3 Staffing and training

The ERO staff for the proposed EOF is described in Section B.1.a of the proposed SEP (Attachment 1 to Enclosure 1), and the training program is described in its Section O. Training for key ERO members supporting MNGP and PINGP will include station-specific differences related to their roles, e.g., technical data display systems, plume exposure pathway risk jurisdictions, release pathways, station ingress and egress routes, offsite geopolitical subareas, and evacuation time estimates. The proposed SEP addresses both sites with site-specific information contained in its annexes and emergency action level schemes.

3.1.4 Size

The total usable space of the proposed EOF is approximately 2849 square feet. Based on the 75 square foot per person guidance of NUREG-0696, this provides enough space for the expected number of EOF personnel during a dual-station event, including NRC Site Team personnel and other Federal responders. Interface between the EOF and OROs is via the Minnesota State EOC/JIC. Provisions for

NRC personnel include a dedicated work area and communications capability as described in Section 3.1.6 below.

Images of the proposed EOF areas and a floor plan are provided at Attachment 1 to Enclosure 4. The actual placement of workspaces and display devices is subject to change.

3.1.5 Radiological monitoring

The proposed EOF is further than 10 miles from the MNGP and the PINGP. Consequently, the habitability criteria described in NUREG-0696, Section 4.2, Table 2, are not applicable.

3.1.6 Communications

Tables F.1.b in the site-specific annexes (MNGP Communications Matrix and PINGP Communications Matrix) illustrate communication systems available in the proposed EOF. These include reliable voice communications to each site's Main Control Room, TSC, OSC, and state and county warning points and EOCs. Provisions exist for communications with FMTs within the EPZs. Access to the ENS, HPN, NRC counterpart links, and the Security Bridge from the proposed EOF is provided via the commercial telephone network which is separate from MNGP and PINGP local telephone switches. Where applicable, site facilities continue to use direct access lines to access ENS, HPN, and NRC counterpart links via the Federal Government's long-distance network. In addition, three telephone lines will be available for NRC use when the proposed EOF is activated.

3.1.7 Instrumentation, data system equipment, and power supplies

Instrumentation used to continuously monitor vital plant parameters in the MCR is described in the site USARs. Essential plant data monitoring capability is available in the emergency facilities through facility computer and display systems.

Xcel Energy uses site-specific versions of the Unified RASCAL Interface (URI) off-site dose projection computer model.

Normal power to the EOF is from reliable offsite sources. Backup power for the EOF is supplied by onsite diesel generation. Essential equipment is backed up by the diesel generation system.
Since the proposed EOF is located offsite, its electrical equipment loads will not affect any safety related power source. Loss of primary commercial power would not cause loss of any stored data vital to EOF functions. Historical data from the site will be accessible from a historical database.

3.1.8 Technical data and data system

The proposed EOF has the capability to display vital plant data and radiological information for each site and unit, in near real time.

The MNGP Safety Parameter Display System (SPDS) is an integrated function of the Plant Process Computer System (PPCS) and displays critical plant variables. Displays based on emergency operating procedures and General Electric generic Emergency Response Information System (ERIS), including meteorological data, are available in the proposed EOF.

The PINGP Emergency Response Computer System (ERCS) collects and processes data for display in the proposed EOF. Requirements for an SPDS are met by a system of displays provided by the ERCS System. Display of this data is also available through the business computer network.

The URI model is used to provide off-site radiological dose and dose rate estimates based on near real time or hypothetical inputs. Dose projection results are given for various locations from the site boundary to 10 miles. URI can provide dose assessment results for multiple release points from each site.

3.1.9 Records availability and management

The EOF has access to site reference materials that may be needed for supporting emergency response. Examples include:

- Plant technical specifications.
- Plant operating procedures.
- Emergency operating procedures.
- Updated Safety Analysis Reports.
- Standard Emergency Plan and its annexes, and State emergency plans.
- Offsite population distribution data.
- Evacuation plans.
- Selected plant drawings, diagrams, and other design information.

3.2 Conclusions

The proposed consolidation of the MNGP EOF, the PINGP EOF, and their common BUEOF continues to provide adequate emergency facilities and equipment for supplying direction and exercising control during an emergency. The proposed EOF will continue to meet the requirements of 10 CFR 50 Appendix E and the planning standards of 10 CFR 50.47(b).

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements

The regulatory requirements and guidance applicable to the proposed EOF changes are as follows:

10 CFR 50.47(b) states:

(b) The onsite and, except as provided in paragraph (d) of this section, offsite emergency response plans for nuclear power reactors must meet the following standards:

(1) Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

(5) Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

(8) Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

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

10 CFR 50. Appendix E. Section IV, Part E states in part:

Adequate provisions shall be made and described for emergency facilities and equipment, including:

8.a. (i) A licensee onsite technical support center and an emergency operations facility from which effective direction can be given and effective control can be exercised during an emergency.

8.b For a nuclear power reactor licensee's emergency operations facility required by paragraph 8.a of this section, either a facility located between 10 miles and 25 miles of the nuclear power reactor site(s), or a primary facility located

less than 10 miles from the nuclear power reactor site(s) and a backup facility located between 10 miles and 25 miles of the nuclear power reactor site(s). An emergency operations facility may serve more than one nuclear power reactor site. A licensee desiring to locate an emergency operations facility more than 25 miles from a nuclear power reactor site shall request prior Commission approval by submitting an application for an amendment to its license. For an emergency operations facility located more than 25 miles from a nuclear power reactor site, provisions must be made for locating NRC and offsite responders closer to the nuclear power reactor site so that NRC and offsite responders can interact face-to-face with emergency response personnel entering and leaving the nuclear power reactor site. Provisions for locating NRC and offsite responders closer to a nuclear power reactor site that is more than 25 miles from the emergency operations facility must include the following:

(1) Space for members of an NRC site team and Federal, State, and local responders;

(2) Additional space for conducting briefings with emergency response personnel;

(3) Communication with other licensee and offsite emergency response facilities;

(4) Access to plant data and radiological information, and

(5) Access to copying equipment and office supplies.

8.c. By June 20, 2012, for a nuclear power reactor licensee's emergency operations facility required by paragraph 8.a of this section, a facility having the following capabilities:

(1) The capability for obtaining and displaying plant data and radiological information for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves;

(2) The capability to analyze plant technical information and provide technical briefings on event conditions and prognosis to licensee and offsite response organizations for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves; and

(3) The capability to support response to events occurring simultaneously at more than one nuclear power reactor site if the emergency operations facility serves more than one site.

4.2 Applicable Regulatory Guidance

Revision 2 to NUREG-0654/FEMA [Federal Emergency Management Agency]-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (Reference 2), establishes evaluation criteria related to the EOF under applicable planning standards.

NUREG-0696, "Functional Criteria for Emergency Response Facilities" (Reference 3), which provides criteria for the NRC staff to use in evaluating whether an applicant or licensee meets the requirements in paragraph IV.E.8 of Appendix E to 10 CFR Part 50. Section 4, "Emergency Operations Facility," of NUREG-0696 provides compliance criteria for the EOF in the following categories:

- Functions (section 4.1);
- Location, Structure, and Habitability (section 4.2);
- Staffing and Training (section 4.3);
- Size (section 4.4);
- Radiological Monitoring (section 4.5);
- Communications (section 4.6);
- Instrumentation, Data System Equipment, and Power Supplies (section 4.7);
- Technical Data and Data System (section 4.8), and
- Records Availability and Management (section 4.9).

The Office of Nuclear Security and Incident Response (NSIR)/Division of Preparedness and Response (DPR) Interim Staff Guidance (ISG) document, NSIR/DPR-ISG-01, "Emergency Planning for Nuclear Power Plants," dated November 2011 (Reference 4) supplements NUREG-0696 and provides guidance in Section IV.I for a performance-based approach for evaluating changes to a consolidated EOF.

4.3 Precedent

The NRC has approved 6 consolidated EOFs located more than 25 miles from stations they support as shown at Attachment 2 to Enclosure 4.

The proposed EOF consolidation is similar to changes approved by the NRC for other licensees. The most recent NRC approval of a similar EOF consolidation occurred for North Anna and Surry Power Stations in an NRC letter dated February 27, 2019 (Reference 12). The NRC has also approved a similar EOF consolidation for Southern Nuclear Operating Company's Edwin I. Hatch Nuclear Plant, Joseph M. Farley Nuclear Plant, and Vogtle Electric Generating Plant (Reference 13). During the past decade, NRC approved addition of plants to previously approved consolidated EOFs, including William States Lee III Nuclear Station, and Brunswick, Robinson and Sheron Harris for Duke Energy's Charlotte EOF in Charlotte, North Carolina (References 14 & 15), and Calvert

Cliffs for the Exelon Mid-Atlantic EOF in Coatesville, Pennsylvania (Reference 16). Also, during the past decade, NRC approved relocation of the Southern Nuclear Operating Company's EOF (Reference 17) and River Bend's backup EOF (Reference 18). Furthermore, the proposed MNGP and PINGP EOF consolidation and evaluation, documented herein continue to meet the emergency planning standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50 Appendix E.

4.4 Conclusions

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

5.0 REFERENCES

1. Management Directive/Handbook 8.2, NRC Incident Response Program, dated January 20, 2015 (ADAMS Accession No. ML18073A199)

2. 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 – Final Report, dated December 2019 (ADAMS Accession No. ML19347D139)

3. NUREG-0696, Functional Criteria for Emergency Response Facilities – Final Report, dated February 1981 (ADAMS Accession No. ML051390358)

4. NSIR/DPR-ISG-01, Revision 0, Emergency Planning for Nuclear Power Plants, dated November 2011 (ADAMS Accession No. ML113010523)

5. Generic Letter 80-90, "Post-TMI Requirements," dated October 31, 1980 (ADAMS (Public Legacy Library) Accession No. 8012160050)

6. Generic Letter 81-10, "Post-TMI Requirements for the Emergency Operations Facility," dated February 18, 1981 (ADAMS (Public Legacy Library) Accession No. 8103160669)

7. NRC Event Notification Report 47569 (January 13, 2012 Prairie Island Alert declaration)

8. Northern States Power Company (Monticello) letter to NRC, Subject: Post-TMI Requirements for the Emergency Operations Facility (Generic Letter 81-10), dated June 8, 1981 (ADAMS (Public Legacy Library) Accession No. 8106150231)

9. Northern States Power Company (Prairie Island) letter to NRC, Subject: Post-TMI Requirements for the Emergency Operations Facility (Generic Letter 81-10), dated June 8, 1981 (ADAMS (Public Legacy Library) Accession No. 8106110405)

10. Northern States Power Company (Prairie Island) letter to NRC, Subject: Emergency Operations Facilities, Generic Letter 81-10, dated January 26, 1982 (ADAMS (Public Legacy Library) Accession No. 8202100451)

11. NRC letter to Northern States Power, Subject: Primary and Backup Emergency Operations Facilities, dated October 27, 1983 (ADAMS (Public Legacy Library) Accession No. 8311100406)

12. NRC Letter to Virginia Electric and Power Company, Subject: North Anna Power Station, Unit Nos. 1 and 2, and Surry Power Station, Unit Nos. 1 and 2 – Issuance of Amendment Nos. 281, 264, 294, and 294 to Consolidate Emergency Operations Facilities and Associated Emergency Plan Changes (EPID L-2018-LLA-0014) dated February 27, 2019 (ADAMS Accession No. ML19031B227)

13. NRC Letter to Southern Nuclear Operating Company, Inc., Subject: Emergency Operations Facility (EOF) Relocation and Consolidation to the Southern Nuclear Corporate EOF (TAC Nos. MC1056, MC1057, MC1058, MC1059, MC1060, and MC1061) dated April 6, 2005. (ADAMS Accession No. ML043350484)

14. Final Safety Evaluation Report for Combined Licenses for William States Lee III Nuclear Station Units 1 and 2 dated August 2016 (ADAMS Accession No. ML16160A414)

15. Brunswick Steam Electric Plant, Units 1 and 2; Shearon Harris Nuclear Power Plant, Unit 1; H. B. Robinson Steam Electric Plant Unit No. 2; and Oconee Nuclear Station, Units 1, 2, and 3 – Issuance of Amendments to Consolidate Emergency Operations Facilities and Associated Emergency Plan Changes (CAC Nos. MF7650, MF7651, MF7652, MF7653, MF7654, MF7655, MF7656, MF7657, MF7658, MF7659, and MF7660) dated August 21, 2017 (ADAMS Accession No. ML17188A387)

16. Calvert Cliffs Nuclear Power Plant, Units 1 and 2 – Issuance of Amendment Nos. 330 and 308 Re: Relocation and Consolidation of the Emergency Operations Facility and Joint Information Center for the Calvert Cliffs Nuclear Power Plant (EPID L-2018-LLA-0241) dated August 26, 2019 (ADAMS Accession No. ML19165A247)

17. Joseph M. Farley Nuclear Plant, Units 1 and 2; Edwin I. Hatch Nuclear Plant, Units 1 and 2, and Vogtle Electric Generating Plant, Units 1, 2, 3, and 4; Issuance of Amendments Regarding the Relocation of the Emergency Operations Facility (CAC Nos. MG0188, MG0189, MG0190, MG0191, MG0192, MG0193, MG0194, and MG0195; EPID L-2017-LLA-0293) dated July 26, 2018 (ADAMS Accession No. ML18183A073)

18. River Bend Station, Unit 1 -Issuance of Amendment Related to the Relocation of the Backup Emergency Operations Facility (TAC No. ME7181) dated September 24, 2012 with correction dated October 9, 2012 (ADAMS Accession Nos. ML12240A180 and ML12269A263)

19. NF-35242, Northern States Power Company Foundation Plan and General Structural Notes for 414 Nicollet Mall, Minneapolis, Minnesota, Sheet No. S-2, December 6, 1963.

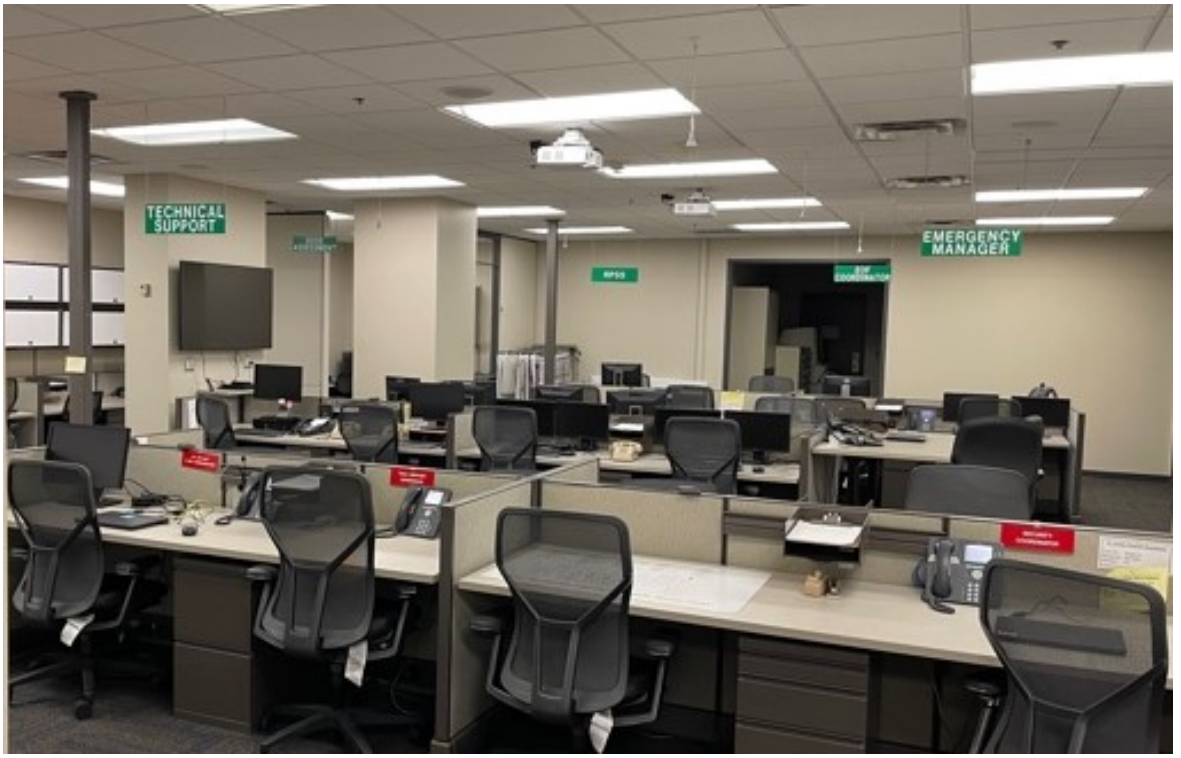
20. Xcel Energy Hazard Insurance Department Report Supplement for 414 Nicollet General Office, Section 2 - File No. 101701, November 14, 2018.

ATTACHMENT 1

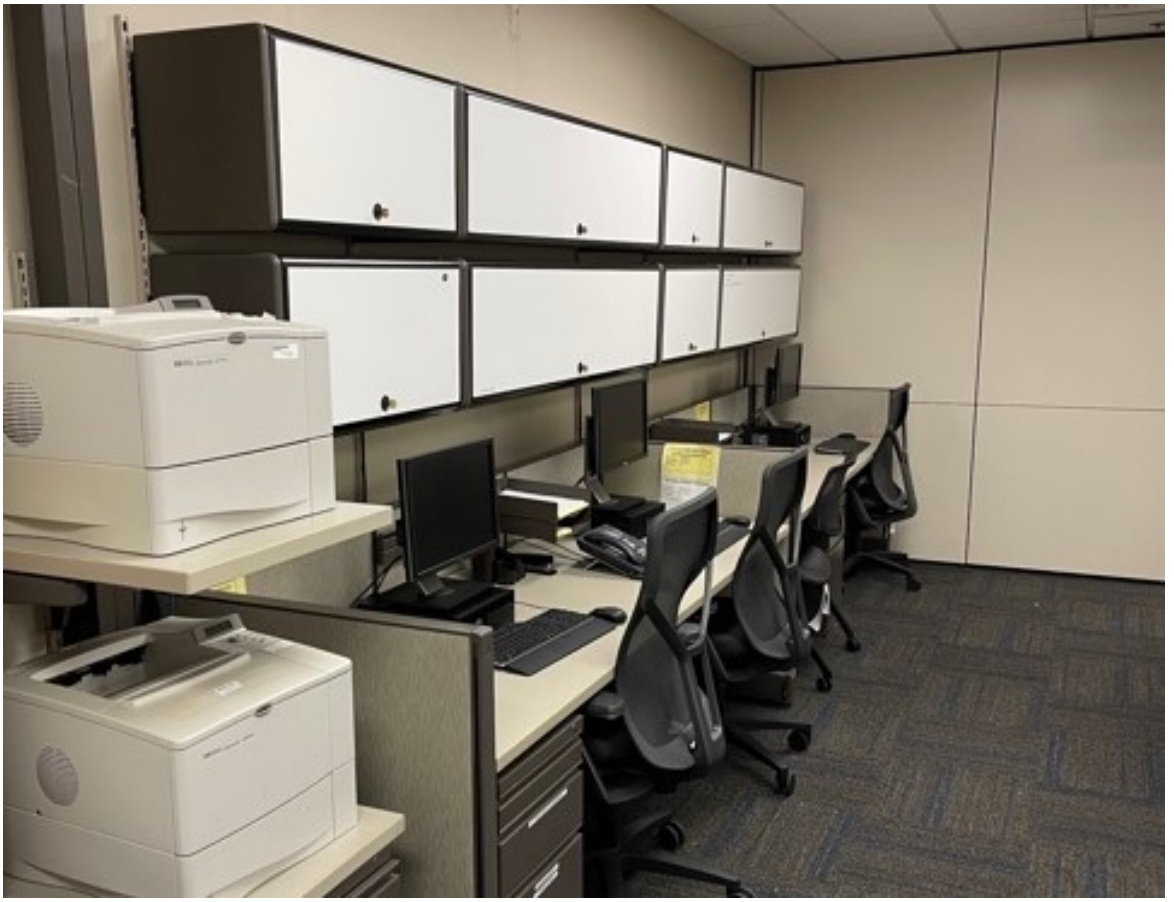
XCEL ENERGY

CONSOLIDATED EMERGENCY OPERATIONS FACILITY IMAGES

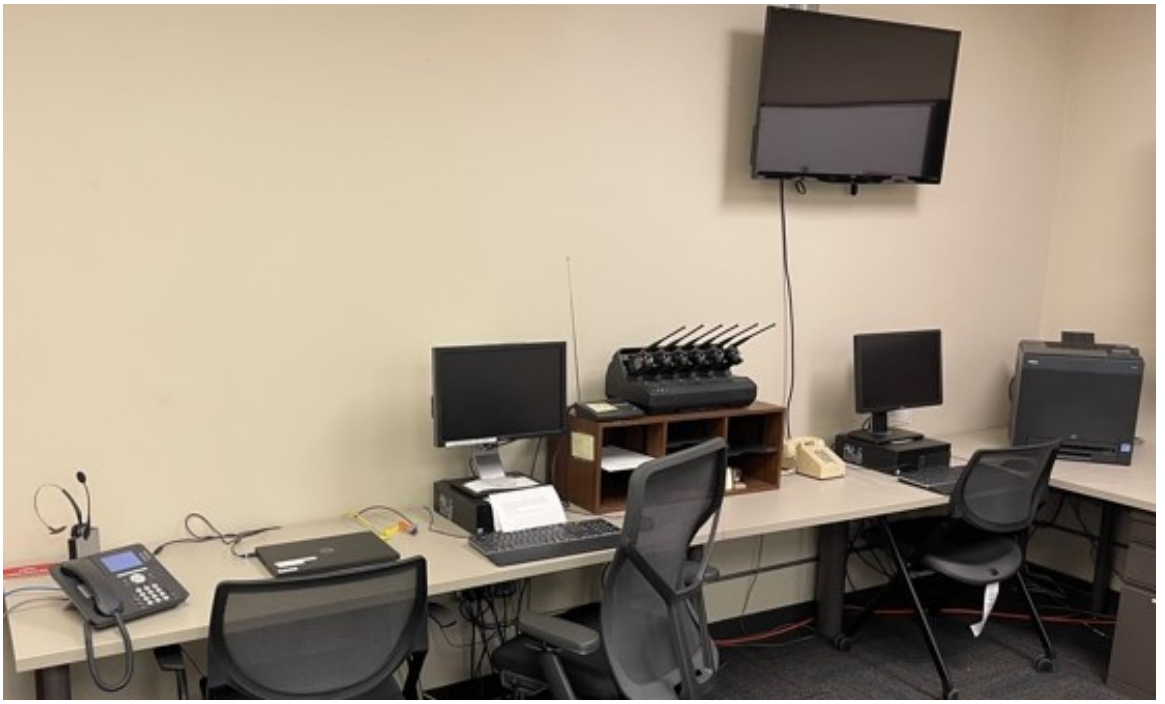
(5 Pages Follow)

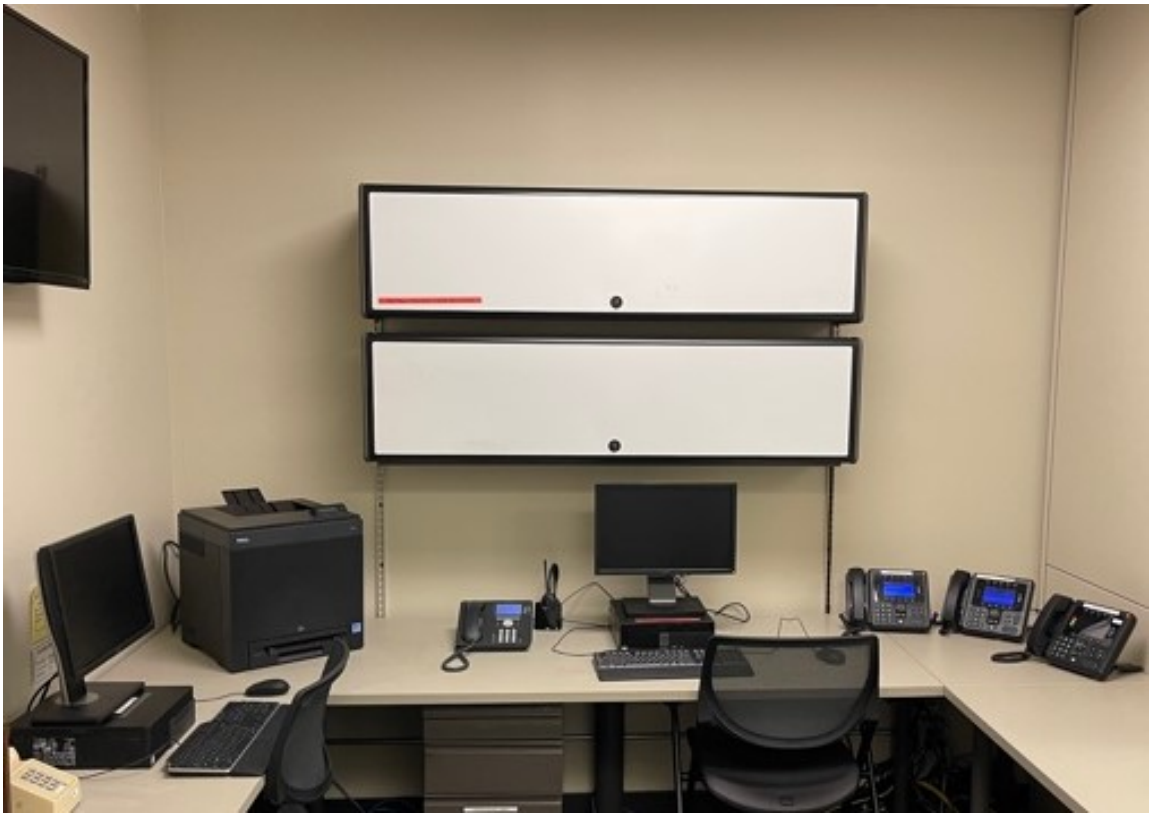


Main Work Area



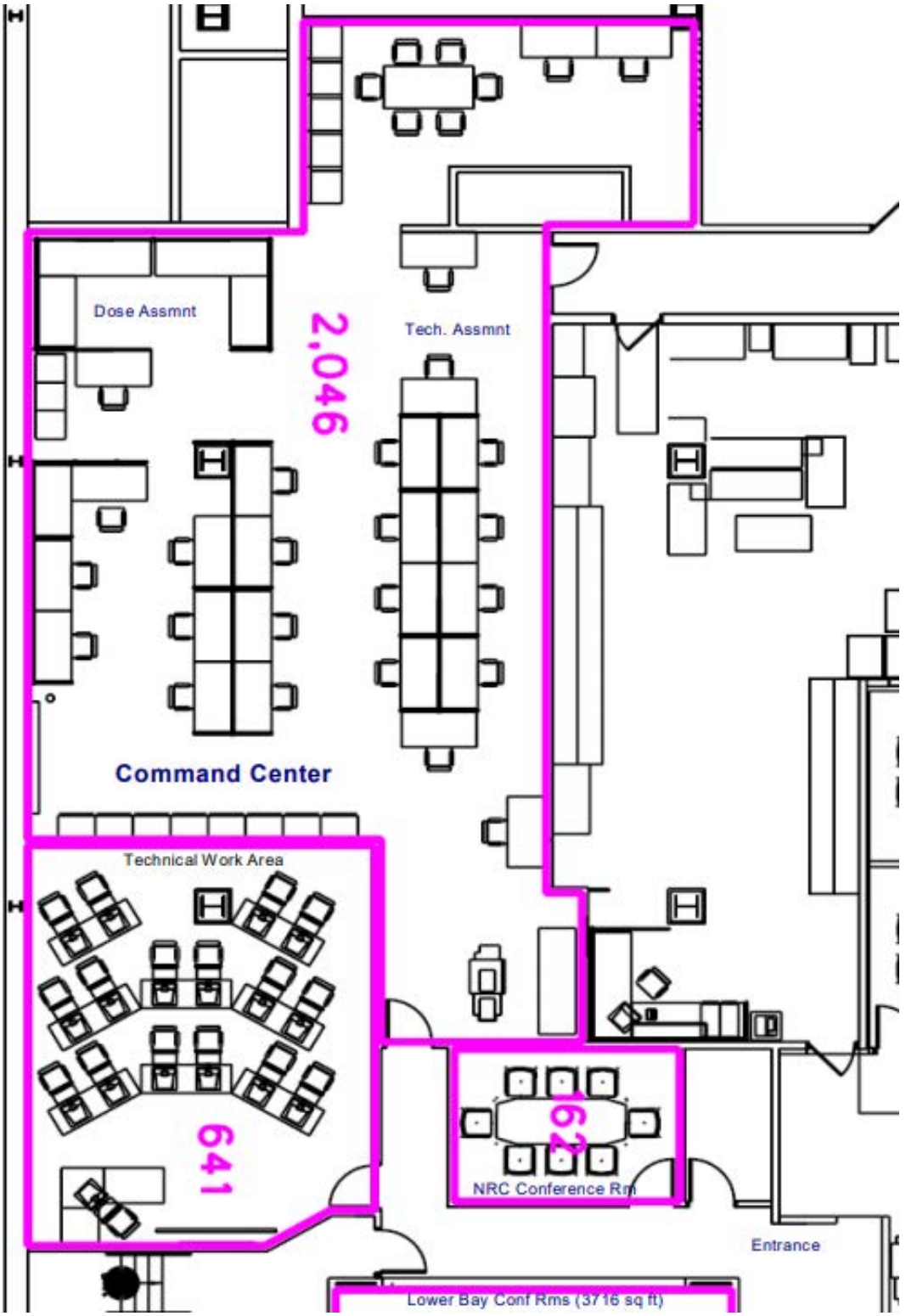
Communications Area





Dose Assessment Area

NRC Conference Area



Proposed EOF Area
(Reference use only – placement of furnishings subject to change)

ATTACHMENT 2

XCEL ENERGY

NRC-APPROVED CONSOLIDATED EOFS LOCATED >25 MILES FROM STATION

(1 Page Follows)

NRC-Approved Consolidated EOFs Located >25 miles from Station

Utility	Applicable Nuclear Power Reactor Sites	Facility Location
NRC Region I		
Exelon Generation Co., LLC	• Calvert Cliffs Nuclear Power Plant, Units 1/2 • Limerick Generating Station, Units 1/2 • Peach Bottom Atomic Power Station, Units 1/2	Coatesville, PA
NRC Region II		
Southern Nuclear Operating Co.	• Edwin I. Hatch Nuclear Plant, Units 1/2 • Joseph M. Farley Nuclear Plant, Units 1/2 • Vogtle Electric Generating Plant, Units 1/2 • Vogtle Electric Generating Plant, Units 3/4 *(COL: under construction)*	Birmingham, AL
Tennessee Valley Authority	• Browns Ferry Nuclear Plant, Units 1/2/3 • Sequoyah Nuclear Plant, Units 1/2 • Watts Bar Nuclear Plant, Units 1/2	Chattanooga, TN
Dominion Energy	• North Anna Power Station, Units 1/2 • Surry Power Station, Units 1/2	Glen Allen, VA
Duke Energy Carolinas, LLC	• Brunswick Steam Electric Plant, Units 1/2 • Catawba Nuclear Station, Units 1/2 • H.B. Robinson Steam Electric Plant, Unit 2 • McGuire Nuclear Station, Units 1/2 • Oconee Nuclear Station, Units 1/2/3 • Shearon Harris Nuclear Power Plant, Unit 1 • William States Lee III Nuclear Station, Units 1/2 *(COL: not yet constructed)*	Charlotte, NC
NRC Region III		
Exelon Generation Co., LLC	• Braidwood Station, Units 1/2 • Byron Station, Units 1/2 • Clinton Power Station, Unit 1 • Dresden Nuclear Power Station, Units 2/3 • LaSalle County Station, Units 1/2 • Quad Cities Nuclear Power Station, Units 1/2	Warrenville, IL

ENCLOSURE 5

LICENSE AMENDMENT REQUEST

STANDARD EMERGENCY PLAN AND CONSOLIDATED EMERGENCY OPERATIONS FACILITY FOR THE MONTICELLO NUCLEAR GENERATING PLANT AND THE PRAIRIE ISLAND NUCLEAR GENERATING PLANT

OFFSITE RESPONSE ORGANIZATION LETTERS

(2 Pages Follow)

MINNESOTA DEPARTMENT OF PUBLIC SAFETY

Homeland Security and Emergency Management

445 Minnesota Street. Suite 223 • Saint Paul, Minnesota 55101-6223
Phone: 651.201.7400 • Fax: 651.296.0459
http://hsem.dps.mn.gov

September 2, 2021

Brian Carberry
Xcel Energy
Emergency Preparedness Manager
414 Nicollet Mall, 414-5
Minneapolis, MN 55401

Dear Mr. Brian Carberry

Subject: Concurrence with Xcel Energy Emergency Plan Change Proposal

We understand that to enhance emergency preparedness, Xcel Energy is revising the Monticello and Prairie Island Emergency Plans to consolidate them under a single Xcel Energy Emergency Plan. This letter is our office's written concurrence regarding the revision to the Xcel Energy Emergency Plans. The revised Emergency Plan is written based on 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. There are many efficiencies that will be realized through this revision for both Xcel Energy and their offsite partners. Utilizing revision 2 of NUREG 0654 allows Xcel Energy to take advantage of lessons learned and technologies available since NUREG 0654 Revision 1 was written and approved in 1980. Additionally, the proposed Xcel Energy Emergency Plan will combine both the Monticello and Prairie Island Emergency Operations Facility into a single facility in Minneapolis at 414 Nicollet Mall. An implementation date will be scheduled after approval of the proposed revision to the Xcel Energy Emergency Plan is received from the NRC (2022). We understand that changes to the Xcel Energy Emergency Plan may result in needed changes to the state and county's REP documents.

If you have any questions, please contact me at (651)201-7434 or patrick.mclaughlin@state.mn.us .

Sincerely,

Patrick McLaughlin
Radiological Emergency Preparedness Administrator
State of Minnesota
Division of Homeland Security and Emergency Management.

STATE OF WISCONSIN

DEPARTMENT OF MILITARY AFFAIRS

DIVISION OF EMERGENCY MANAGEMENT

Greg Engle
Acting Administrator

Tony Evers
Governor

September 2, 2021

Brian Carberry
Xcel Energy
Emergency Preparedness Manager
414 Nicollet Mall, 414-5
Minneapolis, MN 55401

Ref: Concurrence with Xcel Energy Emergency Plan Change Proposal

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Sincerely,

Paul Gazdik
Wisconsin Emergency Management