



May 20, 2022

NG-22-0055
10 CFR 50.54(q)
10 CRF 72.44(f)

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

Duane Arnold Energy Center
Docket No. 50-331
Renewed Op. License No. DPR-49

Revision to Duane Arnold Energy Center (DAEC) ISFSI-Only Emergency Plan

NextEra Energy Duane Arnold, LLC issued revisions to the DAEC's ISFSI-Only Emergency Plan on 4/26/22 and 5/16/22. These revisions incorporated changes that do not reduce the effectiveness of the DAEC Emergency Plan. Pursuant to 10 CFR 50.54(q)(5) and 10 CFR 72.44(f), enclosed are the 50.54(q) Screening forms which provide a summary of the changes and analysis.

This letter contains no new commitments and no revisions to existing commitments.

If you have any questions or require additional information, please contact Tracy Weaver at (319) 851-7250.

A handwritten signature in black ink that reads "Justin Both".

Justin Both
Decommissioning Director, Duane Arnold Energy Center
NextEra Energy Duane Arnold, LLC

Enclosure

cc: Director, Division of Spent Fuel Management
Administrator, Region III, USNRC
Inspector, DAEC, USNRC

Enclosure to NG-22-0055

Duane Arnold Energy Center
50.54(q) Screening Forms

10 Pages Follow

10CFR50.54(q) SCREENING FORM

Page 1 of 4

PCR/AR/NAMS No.: 02425298

SECTION 1: STATION APPLICABILITY

Applicable activity for review (process, document, modification, etc):

Applicable Site: ☒ Duane Arnold Energy Center ☐ Point Beach ☐ Seabrook ☐ St. Lucie ☐ Turkey Point

SECTION 2: PURPOSE

Identify the reason for the screening:

- ☒ 10CFR50.54(q) screening of a Change to the Emergency Plan or procedures implementing the Plan
☐ Emergency Preparedness Function Assessment

SECTION 3: PROVIDE A BRIEF DESCRIPTION OF PROPOSED CHANGE AND LIST THE PROCESS/DOCUMENT THAT IS DRIVING THE CHANGE.

Procedure Number and Current Revision:

DAEC PDEP, "PERMANENTLY DEFUELED EMERGENCY PLAN", Rev. 1 - RETIRE
EBD, "EMERGENCY ACTION LEVELS TECHNICAL BASES DOCUMENT", Rev. 6 - RETIRE
DAEC IOEP, "DAEC ISFSI-ONLY EMERGENCY PLAN", Rev. NI
DAEC EBD, "EAL TECHNICAL BASES DOCUMENT", Rev. NI
EPIP 1.1, "Determination of Emergency Action Levels", Rev. 34
EPIP 1.2, "Notifications", Rev. 56
EPIP 1.3, "Facility Assembly and Site Evacuation", Rev. 24
EPIP 2.3, "Operation of the FTS-2001 Phone Network", Rev. 14
EPIP 2.5, "Emergency Response Operation", Rev. 29
EPIP 3.1, "ISFSI Radiological Monitoring", Rev. 35
EPIP 3.3, Rev. 39 – RETIRE
EPIP 4.3, "Rescue and Emergency Repair Work", Rev. 25
EPIP 5.2, "Termination and Recovery", Rev. 15
EPIP 6.1, "Drill and Exercise Program", Rev. 8
EPIP 6.2 Maintenance of Emergency Response Facilities and Equipment", Rev. 7

Process/Document Driving Change:

DAEC submitted to the NRC License Amendment Request (TSCR-192) to revise the DAEC Emergency Plan and Emergency Action Level (EAL) scheme for ISFSI-Only condition. The NRC has issued Amendment 318 to the Facility License that approves an ISFSI-Only Emergency Plan and EAL scheme for the DAEC.

10CFR50.54(q) SCREENING FORM

Page 2 of 4

PCR/AR/NAMS No.: 02425298

Brief Description (include why the change is being made):

All spent fuel has been removed from the spent fuel pool and is now stored at the ISFSI. As a result, a complete NRC-approved revision of the DAEC Emergency Plan and EAL scheme becomes effective. The current PDEP will be superseded by the DAEC ISFSI-Only Emergency Plan (IOEP). The current EBD will be superseded by the DAEC EBD. Changes to EPIPs will be made to align them with the IOEP and EBD. EPIP 3.3 is no longer needed and is being retired.

☐ Check if EAL Validation & Verification is Attached (required for EAL change not in the NRC SER)

SECTION 4: DETAILED DESCRIPTION OF ACTIVITY BEING REVIEWED. The "activity" is an event or action, or series of actions that may result in a change to the emergency plan or affect the implementation of the emergency plan.

Change Number	Description of Change	Reason for Change	Screening	Planning Standard / Program Element *
1.	<p>Implement the DAEC ISFSI-Only Emergency Plan (IOEP) and DAEC Emergency Action Level and Bases Document (EBD) that were approved by the NRC in License Amendment 318. Revise EPIPs to conform to the IOEP and EBD.</p> <p>In addition, editorial and conforming changes were made to the IOEP and EBD, as described in the attached matrix.</p>		<p><input checked="" type="checkbox"/> Editorial Change: Analysis is NOT required</p> <p><input checked="" type="checkbox"/> Proposed change does NOT affect the Planning Standards /Program Elements: Analysis is NOT required</p> <p><input type="checkbox"/> Proposed change DOES affect the Planning Standards / Program Elements: Analysis IS required</p>	

* Planning Standard / Program Element from Section 7


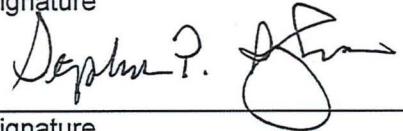
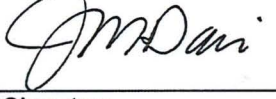
10CFR50.54(q) SCREENING FORM

Page 3 of 4

PCR/AR/NAMS No.: 02425298**SECTION 5: RESULTS OF SCREENING**

- ☒ If **NO** Section 7 criteria are affected, a 10CFR50.54(q) Evaluation is **NOT** required.
- ☐ If **ANY** Section 7 criteria are affected, a 10CFR50.54(q) is required. Use Form 2 for Emergency Plan changes, to evaluate the change.
For all other changes, use Form 5

SECTION 6: SIGNATURE

Prepared by (Print Name) Tracy Weaver	Signature 	Date 4-26-22
Reviewed by (Print Name) Steve Inghram	Signature 	Date 4/26/22
SFAM Approval (Print Name) M. Davis	Signature 	Date 4/26/22
CFAM / PTL Approval (Print Name)	Signature	Date

10CFR50.54(q) SCREENING FORM

Page 4 of 4

PCR/AR/NAMS No.: 02425298

Section 7: Are any of the following affected by this change? (Document in Section 4 for each change.)

No.	Planning Standards / Functions	Requirement	YES	NO
1.	Responsibility for emergency response is assigned..	50.47(b)(1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.	The response organization has the staff to respond and to augment staff on a continuing basis (i.e., 24/7 support) in accordance with the emergency plan.	50.47(b)(1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.	The process ensures that onshift emergency response responsibilities are staffed and assigned (including on-shift staffing study and assumptions)	50.47(b)(2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.	The process for timely augmentation of onshift staff is established and maintained.	50.47(b)(2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.	Arrangements for requesting and using offsite assistance have been made.	50.47(b)(3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.	State and local staff can be accommodated at the EOF in accordance with the emergency plan.	50.47(b)(3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7.	A standard scheme of emergency classification and action levels is in use.	50.47(b)(4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.	Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes after declaration of an emergency and providing follow-up notifications.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.	Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10.	The public ANS meets the design requirements of FEMA-REP-10, "Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants", or is compliant with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11.	Systems are established for prompt communication among principal emergency response organizations.	50.47(b)(6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12.	Systems are established for prompt communication to emergency response personnel.	50.47(b)(6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13.	Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway EPZ.	50.47(b)(7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14.	Coordinated dissemination of public information during emergencies is established.	50.47(b)(7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15.	Adequate equipment & facilities are maintained to support emergency response.	50.47(b)(8)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16.	Methods, systems, and equipment for assessment of radioactive releases are in use	50.47(b)(9)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17.	A range of public PARs is available for implementation during emergencies.	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18.	Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
19.	A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20.	The resources for controlling radiological exposures for emergency workers are established.	50.47(b)(11)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
21.	Arrangements are made for medical services for contaminated, injured individuals	50.47(b)(12)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
22.	Plans for recovery and reentry are developed.	50.47(b)(13)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
23.	A drill and exercise program (including radiological, medical, health physics, and other program areas) is established.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
24.	Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills, are assessed via a formal critique process in order to identify weaknesses.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
25.	Identified weaknesses are corrected.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
26.	Training is provided to emergency responders.	50.47(b)(15)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
27.	Responsibility for emergency plan development and review is established.	50.47(b)(16)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
28.	Planners responsible for emergency plan development and maintenance are properly trained.	50.47(b)(16)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DAEC IOEP and DAEC EBD editorial and conforming changes

Doc	Page*	Section	Change	Justification
DAEC IOEP	all	all	Changed font to Arial, spacing to "normal", and scale to 100%, for consistency.	Editorial changes for consistency.
	various	various	Replaced generic references to "nuclear power plant" or "plant" to "facility".	Nomenclature change consistent with Amd #311.
	12 of 28	F 1.1.2	"DAEC Control Room" should be "DAEC Emergency Response Facility"	Editorial change consistent with implementation of Amds #315 & 318.
	13 of 28	H	Made "Radiological condition..." plural, "Radiological conditions....."	Editorial corrections.
	150 of 28	K	Remove sentence stating: <i>"This authorization is coordinated with the Site Radiation Protection Coordinator when available."</i>	This position was eliminated by Amd #318.
	16 of 28	Table K.1	Minor editorial changes to ensure verbiage from EPA PAG Table 3-1 is verbatim.	Editorial corrections.
	19 of 28	N	Change "estimate" to "estimated".	Editorial corrections.
	21 of 28	P	Changed semicolon to a comma in the section title.	Editorial corrections.
	24 of 28	App 2	Added bullets to list of LOAs.	Editorial change for clarity.
	25 of 28	App 3	Remove EPIP 2.8, <i>Security Threat</i> , from the list.	Previously deleted by PCR02403688
	28 of 28	App 4	Remove NCO, NWS and SFP from the list of acronyms, they are not used.	Editorial change
DAEC EBD	all	all	Changed font to Arial, spacing to "normal", and scale to 100%, for consistency.	Editorial changes for consistency.
	various	various	Replaced generic references to "nuclear power plant" or "plant" to "facility".	Nomenclature change consistent with Amd #311.
	4 of 20	4.1	Removed "plus Notes".	Per Amd #318, there are no applicable Notes.
	8/9 of 20	6.1	Removed AOP, CDE, cpm, DODAM, FAA, FBI, MSL, NORAD, ORO and TEDE.	Editorial - they are no longer referenced in the text.

	10 of 20	6.2	Removed NORMAL LEVELS, UNPLANNED and VISIBLE DAMAGE.	Editorial - they are no longer referenced in the text.
	12 of 20	Att. 1, Table PD-1	Rearrange Table so Alerts are in the first column.	Editorial change
	20 of 20	Att. 2, Table E-1	Rearrange Table E-1 to a vertical format.	Editorial change
	20 of 20	Att. 2, Table E-1	Correct "HM-20" to "HSM-20"; Remove "Outside HSM Door - Centerline of DSC" from first block under HSM-01 through HSM-20; Correct 30 "rem/hr" to "mrem/hr" in the last block.	Editorial corrections.
	20 of 20	Att. 2, Table E-1	Incorporate additions for HSM-31 through HSM-60.	Previously incorporated by PCR02411975.

* Reflects page number of original submittal for easier reference.

10CFR50.54(q) SCREENING FORM

Page 1 of 4

PCR/AR/NAMS No.: 02426388, 02426562

SECTION 1: STATION APPLICABILITY

Applicable activity for review (process, document, modification, etc):

Applicable Site: ☒ Duane Arnold Energy Center ☐ Point Beach ☐ Seabrook ☐ St. Lucie ☐ Turkey Point

SECTION 2: PURPOSE

Identify the reason for the screening:

- ☒ 10CFR50.54(q) screening of a Change to the Emergency Plan or procedures implementing the Plan
☐ Emergency Preparedness Function Assessment

SECTION 3: PROVIDE A BRIEF DESCRIPTION OF PROPOSED CHANGE AND LIST THE PROCESS/DOCUMENT THAT IS DRIVING THE CHANGE.

Procedure Number and Current Revision:

OP-028, "ERO Offsite Agencies Notification Monthly Test", Rev. 34

DAEC IOEP, "DAEC ISFSI-Only Emergency Plan," Rev. 0

EPIP 1.2, "Notifications", Rev. 57

EPIP 2.3, "Operation of the FTS-2001 Phone Network" - RETIRE

EPIP Index, "EPIP Index", Rev. 198

Process/Document Driving Change:

RIS 2000-11, "NRC Emergency Telecommunications System," dated June 30, 2000, provides NRC-approved alternatives to using the FTS 2001.

Brief Description (include why the change is being made):

The NRC has issued Amendment 318 to the Facility License that approved an ISFSI-Only Emergency Plan and EAL scheme for the DAEC. Subsequently, the Control Room is no longer attended. The Emergency Notification System (ENS) phone line requires transition to the Security Building due to continuous staffing requirements. Rerouting of the current FTS 2001 line is an option, however, the site is transitioning to a Voice over Internet Protocol (VoIP) system as part of the decommissioning plan. A VoIP system meets the requirements for the ENS as outlined in RIS 2000-11, which states, "Any other telecommunications system or network that can provide long distance access independent of the local telephone switch." Emergency Plan documents are being updated accordingly.

☐ Check if EAL Validation & Verification is Attached (required for EAL change not in the NRC SER)

10CFR50.54(q) SCREENING FORM

Page 2 of 4

PCR/AR/NAMS No.: 02426388, 02426562

SECTION 4: DETAILED DESCRIPTION OF ACTIVITY BEING REVIEWED. The "activity" is an event or action, or series of actions that may result in a change to the emergency plan or affect the implementation of the emergency plan.

Change Number	Description of Change	Reason for Change	Screening	Planning Standard / Program Element *
1.	Revise the Emergency Planning program documents to remove references to FTS 2001. FTS 2001 is being replaced with a VoIP system that provides long distance access outside of the local telephone switch.	The Control Room ENS line is no longer continuously attended. Testing of the communication method will remain unchanged.	<input type="checkbox"/> Editorial Change: Analysis is NOT required <input checked="" type="checkbox"/> Proposed change does NOT affect the Planning Standards /Program Elements: Analysis is NOT required <input type="checkbox"/> Proposed change DOES affect the Planning Standards / Program Elements: Analysis IS required	

* Planning Standard / Program Element from Section 7

SECTION 5: RESULTS OF SCREENING



- ☒ If **NO** Section 7 criteria are affected, a 10CFR50.54(q) Evaluation is **NOT** required.
- ☐ If **ANY** Section 7 criteria are affected, a 10CFR50.54(q) is required. Use Form 2 for Emergency Plan changes, to evaluate the change. For all other changes, use Form 5

10CFR50.54(q) SCREENING FORM

Page 3 of 4

PCR/AR/NAMS No.: 02426388, 02426562

SECTION 6: SIGNATURE

Prepared by (Print Name) Tracy Weaver	Signature 	Date 5-2-22
Reviewed by (Print Name) Steve Inghram	Signature 	Date 5/3/22
SFAM Approval (Print Name) N/A	Signature	Date
CFAM / PTL Approval (Print Name) N/A	Signature	Date

10CFR50.54(q) SCREENING FORM

Page 4 of 4

PCR/AR/NAMS No.: 02426388, 02426562

Section 7: Are any of the following affected by this change? (Document in Section 4 for each change.)

No.	Planning Standards / Functions	Requirement	YES	NO
1.	Responsibility for emergency response is assigned..	50.47(b)(1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.	The response organization has the staff to respond and to augment staff on a continuing basis (i.e., 24/7 support) in accordance with the emergency plan.	50.47(b)(1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.	The process ensures that onshift emergency response responsibilities are staffed and assigned (including on-shift staffing study and assumptions)	50.47(b)(2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.	The process for timely augmentation of onshift staff is established and maintained.	50.47(b)(2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.	Arrangements for requesting and using offsite assistance have been made.	50.47(b)(3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.	State and local staff can be accommodated at the EOF in accordance with the emergency plan.	50.47(b)(3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7.	A standard scheme of emergency classification and action levels is in use.	50.47(b)(4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.	Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes after declaration of an emergency and providing follow-up notifications.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.	Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10.	The public ANS meets the design requirements of FEMA-REP-10, "Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants", or is compliant with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11.	Systems are established for prompt communication among principal emergency response organizations.	50.47(b)(6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12.	Systems are established for prompt communication to emergency response personnel.	50.47(b)(6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13.	Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway EPZ.	50.47(b)(7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14.	Coordinated dissemination of public information during emergencies is established.	50.47(b)(7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15.	Adequate equipment & facilities are maintained to support emergency response.	50.47(b)(8)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16.	Methods, systems, and equipment for assessment of radioactive releases are in use	50.47(b)(9)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17.	A range of public PARs is available for implementation during emergencies.	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18.	Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
19.	A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20.	The resources for controlling radiological exposures for emergency workers are established.	50.47(b)(11)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
21.	Arrangements are made for medical services for contaminated, injured individuals	50.47(b)(12)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
22.	Plans for recovery and reentry are developed.	50.47(b)(13)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
23.	A drill and exercise program (including radiological, medical, health physics, and other program areas) is established.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
24.	Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills, are assessed via a formal critique process in order to identify weaknesses.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
25.	Identified weaknesses are corrected.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
26.	Training is provided to emergency responders.	50.47(b)(15)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
27.	Responsibility for emergency plan development and review is established.	50.47(b)(16)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
28.	Planners responsible for emergency plan development and maintenance are properly trained.	50.47(b)(16)	<input type="checkbox"/>	<input checked="" type="checkbox"/>