June 10, 2022

L-XE-22-006
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

Response to a Request for Additional Information RE: Xcel Energy Amendment Request to Create a Common Emergency Plan and Emergency Operations Facility for Monticello and Prairie Island (EPID: L-2021-LLA-0210)

References:

1. NSPM letter to NRC, "License Amendment Request: Standard Emergency Plan and Consolidated Emergency Operations Facility for the Monticello Nuclear Generating Plant and the Prairie Island Nuclear Generating Plant," (L-XE-21-005) dated November 15, 2021 (ADAMS Accession No. ML21320A226)
2. NRC email to NSPM, "Request for Additional Information RE: Xcel Energy Amendment Request to Create a Common E Plan and EOF for Monticello and Prairie Island," dated May 11, 2022 (ADAMS Accession No. ML21320A265)

On November 15, 2021, the Northern States Power Company (NSPM), a Minnesota corporation doing business as Xcel Energy, submitted changes to the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP) Emergency Plans, including the Corporate Offsite Emergency Plan pursuant to 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," (Reference 1). The proposed emergency plan changes combine the respective site and corporate emergency plans into a new fleet common Xcel Energy Standard Emergency Plan (SEP) that also includes site-specific annexes. Additionally, as part of this proposed emergency plan change the existing MNGP and PINGP near-site Emergency Operations Facilities (EOFs), and the common backup EOF (BUEOF), are to be replaced with a consolidated EOF located in the Xcel Energy headquarters in Minneapolis.

On May 11, 2022, the U.S. Nuclear Regulatory Commission (NRC) provided a request for additional information (RAI) (Reference 2). The responses to this RAI are provided within Enclosure 1 to this letter. The draft SEP and draft site-specific annexes were revised in

conjunction with the development of these responses (changes indicated by revision lines) and are provided in Attachments 1, 2 and 3, respectively. Also, position analyses were performed for the Emergency Response Organization (ERO) positions discussed within RAI-5 and RAI-6, which are provided in Attachments 4 and 5, for MNGP and PINGP, respectively.

The information provided in this letter does not alter the evaluations performed for Reference 1 in accordance with 10 CFR 50.92, "Issuance of amendment."

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," NSPM is notifying the State of Minnesota of this RAI response by transmitting a copy of this letter and the non-proprietary enclosures to the designated State official.

Should you have any questions or if additional information is needed, please contact Mr. Richard Loeffler at (612) 342-8981 or Rick.A.Loeffler@xcelenergy.com.

Summary of Commitments

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

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on June 10, 2022.

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

Enclosure / Attachments

cc: Administrator, Region III, US NRC
Project Manager, Monticello, US NRC
Resident Inspector, Monticello, US NRC
State of Minnesota

ENCLOSURE

RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION RE: XCEL ENERGY AMENDMENT REQUEST TO CREATE A COMMON EMERGENCY PLAN AND EMERGENCY OPERATIONS FACILITY FOR MONTICELLO AND PRAIRIE ISLAND

(30 pages follow)

RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION RE: XCEL ENERGY AMENDMENT REQUEST TO CREATE A COMMON EMERGENCY PLAN AND EMERGENCY OPERATIONS FACILITY FOR MONTICELLO AND PRAIRIE ISLAND

On November 15, 2021, the Northern States Power Company (NSPM), a Minnesota corporation doing business as Xcel Energy, submitted changes to the Monticello Nuclear Generating Plant (MNGP) and the Prairie Island Nuclear Generating Plant (PINGP) Emergency Plans, including the Corporate Offsite Emergency Plan under 10 CFR 50.90 (Reference 1). The proposed emergency plan changes combine the respective site and corporate emergency plans into a new fleet common Xcel Energy Standard Emergency Plan (SEP) that also includes site-specific annexes. Additionally, as part of this proposed emergency plan change the existing MNGP and PINGP near-site Emergency Operations Facilities (EOFs), and the common backup EOF (BUEOF), are to be replaced with a consolidated EOF located in the Xcel Energy headquarters in Minneapolis.

On May 11, 2022 , the U.S. Nuclear Regulatory Commission (NRC) provided a request for additional information (RAI) (Reference 2). The individual requests and the associated response are provided in the following section. As part of the response to this RAI the draft SEP and draft site-specific annexes were revised. Also, position analyses were performed for the Emergency Response Organization (ERO) positions discussed within RAI-5 and RAI-6, which are provided in Attachments 4 and 5, respectively.

Attached to this enclosure are the following:

Attachment 1 – EPLAN-01, Revision 0, Standard Emergency Plan
Attachment 2 – EPLAN-02, Revision 0, Monticello Plan Annex
Attachment 3 – EPLAN-03, Revision 0, Prairie Island Plan Annex
Attachment 4 – Xcel Energy Proposed Emergency Response Organization (ERO) Position Analysis, Response to RAI-5
Attachment 5 – Xcel Energy Proposed Emergency Response Organization (ERO) Position Analysis, Response to RAI-6

RAI 1

Requirement:

- 10 CFR 50.54(q)(3) requires the licensee may make changes to its emergency plan without NRC approval only if the licensee performs and retains an analysis demonstrating that the changes do not reduce the effectiveness of the plan and the plan, as changed, continues to meet the requirements in appendix E to this part and, for nuclear power reactor licensees, the planning standards of § 50.47(b).

- 10 CFR 50.54(q)(4) requires the changes to a licensee's emergency plan that reduce the effectiveness of the plan as defined in paragraph (q)(1)(iv) of this section may not be implemented without prior approval by the NRC. A licensee desiring to make such a change after February 21, 2012, shall submit an application for an amendment to its license. In addition to the filing requirements of §§ 50.90 and 50.91, the request must include all emergency plan pages affected by that change and must be accompanied by a forwarding letter identifying the change, the reason for the change, and the basis for concluding that the licensee's emergency plan, as revised, will continue to meet the requirements in appendix E to this part and, for nuclear power reactor licensees, the planning standards of § 50.47(b).

Issue: Page 2 of the request dated November 15, 2021, states,

> 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. [emphasis added]

However, throughout the license amendment request (LAR), the justifications state,

> …do not represent a material change from the current Corporate Offsite, MNGP, or PINGP Emergency Plan commitments.
>
> Language standardized in the proposed Plan without change in process or intent.

There are no changes identified that Xcel determined would be a reduction in effectiveness requiring NRC approval.

Request: Provide the regulatory basis for performing the review of the LAR, with the exception of the consolidation of the near-site EOFs into the proposed consolidated EOF. Additionally, what specific changes require NRC prior approval under 10 CFR 50.54(q)(4)?

RAI 1 Response

As described in the cover letter to the license amendment request (LAR), the changes being pursued under 10 CFR 50.90 represent a wholistic change to the structure of the emergency plans associated with the Northern States Power Company – Minnesota (doing business as Xcel Energy). The proposed Standard Emergency Plan (SEP) includes site-specific annexes, together with a consolidated Emergency Operations Facility (EOF). This wholistic change is conservatively viewed as a reduction in effectiveness based on the current guidance associated with 10 CFR 50.54(q). While some of the details within the proposed SEP are not changed from those within the currently approved emergency plans, all the changes were provided in order to present a complete picture.

Below are examples of specific changes proposed to the current Monticello, Prairie Island and the Corporate Xcel Energy Emergency Plans that could be considered to be a reduction in effectiveness as discussed in Regulatory Guide, 1.219, Revision 1, “Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors,” as defined in 10 CFR 50.54(q).

- Reduction in the number of Emergency Response Organization (ERO) positions.
- Reduction in the number of on-shift staff.
- Changes to the minimum staff positions for facility activation in the Technical Support Center (TSC), the Operations Support Center (OSC), and the Emergency Operations Facility (EOF).
- Elimination of the Back-Up OSC at Monticello.

RAI 2

Requirement:

- 10 CFR 50.47(b)(2) requires 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.

- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion B.1 states that 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.

Issue: Table B-1, "Minimum On-Shift and Augmented Staffing," (hereafter referred to as Table B-1) of the proposed Xcel SEP indicates that a second communicator was added that would be either a Reactor Operator (RO) or Senior Reactor Operator (SRO). The NRC staff could not determine if the RO or SRO provided in Table B-1 would be a dedicated communicator that is in addition to the licensed on-shift operators required by technical specifications and/or regulations. Because Table B-1 does not show the RO or SRO communicator as a position that is performed by an individual performing concurrent actions, it appears that this would be a dedicated communicator that is in addition to on-shift licensed operator staffing.

Request: Provide clarification as to whether the RO or SRO performing a communication function would be in addition to the on-shift licensed operators as required by technical specifications and/or regulation. Note: if a RO or SRO is required by technical specifications or regulations to operate the plant, it does not appear reasonable that that individual be concurrently assigned the ERO communications task because both of those functions could require immediate actions and could not reasonably be performed concurrently.

RAI 2 Response

The intent of providing the second communicator in the LAR submittal was to reflect the existing practice of providing the initial Emergency Notification System (ENS) notification using the Licensed Operator staffing in the Control Room. The primary function of the first communicator is to perform the required Offsite Response Organization (ORO) communications.

NUREG-0654, Revision 2, "Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness," specifies a single position on-shift for performance of the notification function. To better align with current guidance, SEP Section B.1.a, and Table B-1 have been revised to reflect the NUREG-0654, Revision 2, requirement of a single communicator on-shift with the primary function of offsite communications. The ENS communicator function described for augmenting the on-shift position remains unchanged. The revised SEP is provided as Attachment 1 to this enclosure.

RAI 3

Requirement:

- 10 CFR 50.47(b)(2) requires 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.

- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion B.1 states that 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.

Issue: The proposed Xcel SEP would replace the chemistry technician performing dose assessment with one of the on-shift radiation protection (RP) technicians. Enclosure 2, "Xcel Energy Standard Emergency Plan Monticello Annex – Technical Analysis," and Enclosure 3, "Xcel Energy Standard Emergency Plan Prairie Island Annex – Technical Analysis," of the application states that that one of the two on-shift RP technicians performs on-site surveys and that the second on-shift RP technician will perform the protective action function. It was not clear to the NRC staff how two on-shift RP technicians could perform these tasks concurrently with performing the dose assessment function.

Request: Explain how replacing the chemistry technician performing dose assessment with one of the on-shift RP technicians will not impact the capability to perform the required RP functions until relieved at 60 minutes.

RAI 3 Response

NUREG-0654, Revision 2, states that the on-shift dose assessment function can be performed as a collateral duty. Per the SEP, the on-shift dose assessment function is performed using a rapid mode of the site-specific Unified Radiological Assessment System for Consequence Analysis (RASCAL) Interface (URI) dose assessment model and can be performed on any designated computer. The Radiation Protection Technician performing the on-shift dose assessment function would be able to perform dose assessments from the radiological control point and communicate results to the Shift Manager. The capability to perform the dose assessment function from remote locations allows the Shift Manager and Radiation Protection Technician the flexibility to perform the function from the most effective locations.

A staffing analysis meeting the requirements of 10 CFR 50, Appendix E, was performed with the collateral duty assigned to the Radiation Protection Technician. The results of the time-motion study for this function showed that the assignment of the Dose Assessment Function to the Radiation Protection Technician as a collateral duty was acceptable during the period prior to ERO augmentation.

RAI 4

Requirement:

- 10 CFR 50.47(b)(2) requires 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.

- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion B.1 states that 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.

- NUREG-0654, Revision 2 Table B-1 "Notes," state in part,

  > The minimum ERO staffing plan is that which is required to effectively implement the site-specific emergency plan (*i.e., the emergency plan cannot be effectively implemented without this staff*). [emphasis added]

Issue: Section B.3 of the proposed Xcel SEP states,

> 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 [Technical Support Center], OSC [Operations Support Center] and EOF for facility activation.

However, Figures B-1, "TSC Organization," B-2, "OSC organization," and B-3, "EOF Organization," show minimum staffing for the respective facility activation that is not consistent with the Xcel Table B-1.

Request: Provide justification as to how these facilities can be considered staffed for activation with the level of staffing below the Xcel Table B-1 minimum staffing.

RAI 4 Response

The proposed SEP provides for staffing of the required functions within 60 and 90 minutes of an Alert or higher classification to relieve and support the on-shift staff and effectively implement the Emergency Plan. The positions listed in SEP Table B-1 include the minimum on-shift and augmented staffing as identified in NUREG-0654, Revision 2, Table B-1 as well as the minimum staff for facility activation as identified in Figures B-1, B-2, and B-3.

SEP Figures B-1, "TSC Organization," B-2, "OSC Organization," and B-3, "EOF Organization," are intended to show the required staffing and applicable response times for each position. The positions in each figure annotated as "minimum staffing'' represent a subset of the facility

staffing needed for the facility to be activated. This “minimum staffing” is specifically designed to allow activation of the facilities prior to full staffing in order to reduce the burden on the Control Room

The “facility activation” definition as used in the current Emergency Plan, applies to positions responsible for performance of the command-and-control functions of Classification, Notification, Dose Assessment/Protective Action Recommendations (PARs), and Emergency Exposure Authorization.

The number of ERO personnel and discipline specific capabilities provided by the minimum facility activation staff is sufficient to assume responsibility for the command-and-control functions from the on-shift Control Room staff. The activation of the facility prior to 60 minutes does not preclude the remainder of the required functions being staffed within their specified response times. Defining facility activation based on the staffing needed for command-and-control while also providing staffing for the remainder of the required functions within their specified time frames is consistent with the guidance of NSIR/DPR-ISG-01, Interim Staff Guidance, “Emergency Planning for Nuclear Power Plants,” Section IV.I, Subsection 4.1, which describes staffing and activation of the facility within timeframes and at emergency classification levels defined in the licensee emergency plan.”[1] This indicates that ERO augmentation staffing and facility activation criteria may be separate and distinct areas for performance evaluation based on licensee specific commitments.

For the TSC, the TSC Emergency Director, Core Thermal Engineer, Radiological Assessment Coordinator, Dose Projection Specialist, Offsite Communicator, and ENS Communicator positions in the Technical Support Center (TSC) will relieve the control room staff of classification, core damage assessment, emergency exposure authorization and NRC notification, responsibilities. The change removes the ERF Communicator as a minimum staffing position for activation of the TSC as this position is not required for performance of a command-and-control function. Additionally, the proposed change provides a Dose Projection Specialist as a minimum staffing position to support performance of dose assessment and PAR development in that facility. A comparison of the current Emergency Plans’ and proposed SEP’s TSC minimum staffing for activation is provided in the following table.

For the OSC, the proposed SEP maintains the OSC Coordinator as the position responsible for relieving the Control Room of responsibility for oversight of repair and corrective actions. The proposed change removes the Radiation Protection Coordinator from the facility minimum staffing for activation and extends the response time to 90 minutes. The OSC Coordinator and the TSC Radiological Assessment Coordinator, both 60-minute responders are able to maintain oversight of augmented Radiation Protection Technicians until the OSC RP Coordinator arrives. This change is in accordance with NUREG-0654 Revision 2.
A comparison of the current Emergency Plans’ and proposed SEP’s OSC minimum staffing for activation is provided in the following table.

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1. NSIR/DPR-ISG-01, also refers to NRC Inspection Procedure, IP 71114.03, “Emergency Response Organization Staffing and Augmentation System,” Section 03.01, which states for NRC inspector guidance that ERO augmentation staffing and Emergency Response Facility (ERF) activation criteria are defined per the licensee’s Emergency Plan commitments.

For the EOF, the proposed SEP identifies the Emergency Manager, Radiological Assessment Coordinator, Dose Projection Specialist, and Offsite Communicator in the EOF as the positions that will relieve the TSC of responsibility for offsite response coordination, PARs, dose assessment, and state/local notifications. By establishing this minimum command-and-control staffing needed for facility activation, the potential for relief of the TSC personnel of these responsibilities could occur sooner than the 90-minute augmented response time. The proposed change removes the ENS Communicator from the EOF staffing as this function will remain in the TSC. Like the TSC proposed change, the ERF Communicator position is removed from minimum staffing for facility activation, however, it remains a 90-minute response position in the EOF. Finally, the proposed change provides for a Dose Projection Specialist as a minimum staff position to support performance of dose assessment and PAR development in that facility. A comparison of the current Emergency Plans' and proposed SEP's EOF minimum staffing for activation is provided in the following table.

The approach of allowing facility activation with a minimum staffing is consistent with the current emergency plans at Xcel Energy for the Monticello and Prairie Island, Units 1 and 2 nuclear power plants, References 3 and 4, respectively. Also, it has been approved in recent applications for both the Perry Nuclear Power Plant and the Diablo Canyon Nuclear Power Plant, Units 1 and 2, References 5 and 6, respectively.

Facility Activation Minimum Staff Change Comparison		
TSC Minimum Staffing (MNGP / PINGP)		
Current Plan (Figure 13.1 / Figure 1)	**Proposed Plan (Figure B-1)**	**Change Summary**
Emergency Director	Emergency Director	None
ERF Communicator	None	Removed from minimum staffing for activation since this position is not required for transfer or performance of any command-and-control functions.
Operations Group Leader	Operations Coordinator	Title change for purposes of fleet standardization.
Radiological Emergency Coordinator	Radiological Assessment Coordinator	Title change for purposes of fleet standardization.
Offsite Communicator	Offsite Communicator	None
ENS Communicator	ENS Communicator	None
Core Thermal Engineer	Core Thermal Engineer	None
None	Dose Projection Specialist	Added position to minimum staffing for activation in support of dose assessment and PAR development functions.

Facility Activation Minimum Staff Change Comparison		
OSC Minimum Staffing (MNGP / PINGP)		
Current Plan (Figure 13.1 / Figure 1)	**Proposed Plan (FigureB-2)**	**Change Summary**
OSC Coordinator	OSC Coordinator	None
Radiation Protection Coordinator	None	Removed from minimum staffing for activation since this position is not required for transfer or performance of oversight command-and-control function.
EOF Minimum Staffing (MNGP / PINGP)		
Current Plan (Figure 13.1/Figure 1)	**Proposed Plan (Figure B-3)**	**Change Summary**
Emergency Manager	Emergency Manager	None
RP Support Supervisor	Radiological Assessment Coordinator	Title change for purposes of fleet standardization.
ENS Communicator	None	Removed position from the EOF since function will not be transferred from the TSC to the EOF under the proposed change.
Offsite Communicator	Offsite Communicator	None
ERF Communicator	None	Removed from minimum staffing since this position is not required for transfer or performance of any command-and-control functions. Position continues to be a 90-minute responder to the EOF.
None	Dose Projection Specialist	Added position to minimum staffing for activation in support of dose assessment and PAR development functions.

RAI 5

Requirement:

- 10 CFR 50.47(b)(2) requires 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.

- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion B.1 states that 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.

Issue: The proposed Xcel SEP would eliminate the following positions from the MNGP Emergency Plan:

Table-1: MNGP Positions with responsibilities transferred to other individuals	
Monitoring Section Leader	TSC
Assistant EOF Coordinator / Agency Liaison	EOF
Assistant RP Support Supervisor	EOF

As justification for the above changes, Xcel stated that the responsibilities have been transferred to other individuals and there is no corresponding position in NUREG-0654, Revision 2, Table B-1. Because Xcel is proposing to change the MNGP and PINGP Emergency Plans, the NRC staff needs sufficient objective evidence to independently conclude that the proposed Xcel SEP and site-specific annexes will continue to meet the requirements of 10 CFR 50.47(b)(2) and the applicable sections of Appendix E to 10 CFR Part 50.

Request: Provide objective evidence that demonstrates the proposed Xcel SEP and site-specific annexes would continue to be effective with the removal of the ERO positions identified in Table-1 of this document. This objective evidence could include a detailed task analysis and/or a demonstration through a drill that the plan would be effective as proposed.

RAI 5 Response

The detailed analysis requested shows that the tasks provided in those positions identified in RAI-5 perform administrative support functions or that the Emergency Plan functions previously performed by these positions have been transferred to other ERO positions identified in the proposed SEP and can be performed successfully to implement the Plan.

The detailed task analysis is provided as Attachment 4 to this response.

RAI 6

Requirement:

- 10 CFR 50.47(b)(2) requires 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.

- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion B.1 states that 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.

Issue: The proposed Xcel SEP and site-specific annexes would eliminate the following positions from the MNGP and PINGP Emergency Plans:

Table-2: Positions removed from MNGP or PINGP Emergency Plans	
Safety Parameter Display System (SPDS) Operator	MNGP TSC
Trending	MNGP TSC
Support Group Leader	MNGP TSC
Support Group	MNGP TSC
Radiation Protection (RP) Status Board	MNGP EOF
SPDS Operator	MNGP EOF
Trending	MNGP EOF
Support Staff	MNGP EOF
Assembly Point Coordinator	PINGP TSC
Radiological Emergency Coordinator Assistant	PINGP TSC
Operations Group Leader Assistant	PINGP TSC
TSC Coordinator Assistant	PINGP TSC
Work Management Leader	PINGP TSC
Logistics Support Leader	PINGP TSC
Emergency Response Computer System Operator	PINGP TSC
Status Board Keeper	PINGP TSC
Record Log Keeper	PINGP TSC
Ops Advisor (refers to use of on-shift and personnel and the TSC Operations Coordinator)	PINGP OSC
Status Board Keeper	PINGP OSC
RP Support Supervisor Assistant -State Liaison (assigned responsibilities to Radiological Assessment Coordinator)	PINGP EOF
RP Support Supervisor Assistant – Field Monitoring and Dose Assessment	PINGP EOF
Rad Status Board Keeper	PINGP EOF
EOF Coordinator Assistant	PINGP EOF

Table-2: Positions removed from MNGP or PINGP Emergency Plans	
Administrative Support Lead	PINGP EOF
Administrative Support Staff	PINGP EOF
Status Board Keeper	PINGP EOF
Trending Team Leader	PINGP EOF
Emergency Response Computer System Operator	PINGP EOF
Event Status Board Keeper	PINGP EOF
Narrative Log Keeper	PINGP EOF

The typical justification provided for the above changes is that the positions do not perform any emergency preparedness functions and will continue to be provided in accordance with implementing procedures. It was not clear to the NRC staff why emergency preparedness functions would be retained in implementing procedures for positions that do not perform any emergency preparedness functions. Xcel further stated that the responsibilities have been transferred to other individuals and there is no corresponding position in NUREG-0654, Revision 2, Table B-1. Because Xcel is proposing to change the MNGP and PINGP Emergency Plans, the NRC staff needs sufficient objective evidence to independently conclude that the proposed Xcel SEP and site-specific annexes will continue to meet the requirements of 10 CFR 50.47(b)(2) and the applicable sections of Appendix E to 10 CFR Part 50.

Request: Due to the number of support or administrative positions being removed, provide objective evidence that demonstrates the proposed Xcel SEP would continue to be effective with the removal of the ERO positions identified in Table-2 of this document. This objective evidence could include a detailed task analysis and/or a demonstration through a drill that the plan would be effective as proposed.

RAI 6 Response

The detailed analysis requested shows that the tasks provided in those positions identified in RAI-6 perform administrative support functions or that the Plan functions previously performed by these positions have been transferred to other ERO positions identified in the proposed SEP and can be performed successfully to implement the Plan.

The detailed task analysis is provided as Attachment 5 to this response.

RAI 7

Requirement:

- 10 CFR 50.47(b)(5) requires, in part, …the content of initial and followup messages to response organizations and the public has been established….

- Associated guidance in NUREG-0654, Section II.E, Evaluation Criterion E.2 states that 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 NNP [nuclear power plant].

Issue: Section E.3 of Attachment 1, Enclosure 1, "Standard Emergency Plan," states: "The content of the follow-up messages is detailed in implementing procedures."

However, the proposed Xcel SEP and site-specific annex removed significant details contained in currently approved emergency plans for the respective sites.

Request: Describe where the level of detail removed from the approved emergency plans for the respective sites, and necessary to implement the proposed Xcel SEP and site-specific annexes, will be specifically addressed (e.g., emergency plan implementing procedures) and the process to be used to ensure the continued effective implementation of the Xcel SEP and site-specific annexes.

RAI 7 Response

NSPM has revised Section E.1.a of the SEP, to provide additional detail regarding the contents of follow-up emergency notification messaging.

Details necessary to implement the proposed SEP and the site-specific annexes are to be re-located from the current Monticello, Prairie Island, and Corporate Emergency Plans to the fleet Emergency Plan Implementing Procedures (EPIPs), site administrative procedures, and the ERO training program. The SEP, Appendix C has been renamed and updated to reflect the relationship between NUREG-0654, Revision 2, the SEP, site-specific annexes, and implementing procedures. The revision to the SEP is provided as Attachment 1 to this response.

The ERO training program, combined with the site-specific drill programs will be used to evaluate continued effective implementation of the SEP and site-specific annexes. Future changes to the SEP and annexes will be evaluated in accordance with 10 CFR 50.54(q).

RAI 8

Requirement:

- 10 CFR 50.47(b)(8) requires adequate emergency facilities and equipment to support the emergency response are provided and maintained.

- Associated guidance in NUREG-0654, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants (FEMA-REP-1),” Section II.H, Evaluation Criterion H.3 states that a EOF is established, using current Federal guidance, from which nuclear power plant conditions are evaluated and mitigative actions are developed.

- Associated guidance in NUREG-0696, “Functional Criteria for Emergency Response Facilities,” provides guidance for the EOF.

Issue: Page 1 of the November 15, 2021, request refers to an EOF as the “Emergency Offsite Facility.” The Xcel SEP identifies the EOF as an “Emergency Operations Facility.”

Request: Provide clarification that the EOF referred to in the LAR should actually refer to an Emergency Operations Facility and not an Emergency Offsite Facility.

RAI 8 Response

The reference on the first page of the cover letter to the LAR incorrectly referred to the EOF as the Emergency Offsite Facility and should have referred to the EOF as an Emergency Operations Facility.

RAI 9

Requirement:

- 10 CFR 50.47(b)(8) requires adequate emergency facilities and equipment to support the emergency response are provided and maintained.

- Paragraph IV.E.8.b of Appendix E to 10 CFR Part 50 requires that for an EOF located more than 25 miles from a nuclear reactor site, provisions be made for locating NRC and offsite responders closer to the reactor site to facilitate face-to-face interaction with emergency personnel entering and leaving the site.

- Associated guidance in Section IV.I to NSIR/DPR-ISG-01, "Interim Staff Guidance on Emergency Planning for Nuclear Power Plants" (ADAMS Accession No. ML113010523), describes the minimum provisions at the near-site location, consistent with paragraph IV.E.8.b of Appendix E to 10 CFR Part 50. Specifically, Section 4.1, states:

  > Locating NRC and offsite agency staff closer to a site if the EOF is greater than 25 miles from the site. Minimum provisions at this location should include the following items: conference area with whiteboards, separate areas suitable for briefing and debriefing response personnel, telephones, site ERO telephone contact lists, computers with internet access, access to a copier and office supplies, and radiation monitoring capability.

Issue: Sections H.3 and H.3.a of the site-specific annexes do not provide a description of the minimum provisions at the near-site locations.

Request: Pease provide a list of minimum provisions at the near-site locations for MNGP and PINGP site-specific annexes.

RAI 9 Response

NSPM has revised Section H.3.a of the SEP to include additional detail as noted within NSIR/DPR-ISG-01 that is common to both Xcel Energy nuclear power plants. The site-specific annexes have also been revised to remove detail now being relocated to the SEP. The revised SEP and site-specific annexes are provided as Attachments 1, 2, and 3 respectively, to this response.

RAI-10

Requirement:

- 10 CFR 50.47(b)(8) requires adequate emergency facilities and equipment to support the emergency response are provided and maintained.

- Associated guidance in NUREG-0654, Section II.H, Evaluation Criterion H.1 states that a TSC is established, using current Federal guidance, from which nuclear power plant conditions are evaluated and mitigative actions are developed.

- Associated guidance in NUREG-0696 provides guidance for the TSC.

Issue: Section H, "Emergency Facilities and Equipment," of the PINGP site-specific annex states in part,

> The PINGP TSC has the following capabilities:
> • Sufficient working space for ERO and NRC personnel….

However, item #418 of Enclosure 3, Attachment 3, "Prairie Island Nuclear Generating Plant Emergency Plan Justification Matrix," states,

> Working space for about twenty-five people….

Additionally, the site-specific details in the Xcel SEP and site-specific annexes do not address some of the functional criteria in NUREG-0696 (e.g., function, size, structure, habitability, instrumentation, data system equipment and power supplies, etc.) for the TSCs.

Request: Provide justification for not addressing the functional criteria for the TSC in the Xcel SEP and site-specific annexes.

RAI 10 Response

The TSC description provided in the original submittal is generally consistent with the level of detail contained in the existing Emergency Plans. NSPM has revised Section H.1 of the SEP and site-specific annexes to include additional detail to address TSC functional criteria. The revised SEP and site-specific annexes are provided as Attachments 1, 2, and 3 respectively, to this response.

RAI 11

Requirement:

- 10 CFR 50.47(b)(8) requires adequate emergency facilities and equipment to support the emergency response are provided and maintained.
- Associated guidance in NUREG-0654, Section II.H, Evaluation Criterion H.2 states that a OSC is established, using current Federal guidance, from which repair team activities are planned and teams are dispatched to implement actions.
- Associated guidance in NUREG-0696, provides guidance for the OSC and states,

> No specific habitability criteria are established for the OSC. If the OSC habitability is not comparable to that of the control room, the licensee's emergency plan shall include procedures for evacuation of OSC personnel in the event of a large radioactive release.

Issue: Item #462 of Enclosure 2, Attachment 3, "Monticello Nuclear Plant Change Justification Matrix," states in part,

> The Plan eliminates specification of an onsite Back-up OSC.

There is no information related to a back-up OSC in the current PINGP Emergency Plan, nor the PINGP Annex.

Request: Provide justification for not addressing the functional criteria for the OSC in the Xcel SEP and site-specific annexes.

RAI 11 Response

The OSC description provided in the original submittal is generally consistent with the level of detail contained in the existing Emergency Plans. NSPM has revised Section H.2 of the SEP and site-specific annexes to include additional detail to address OSC functional criteria. The revised SEP and site-specific annexes are provided in Attachments 1, 2, and 3, respectively, to this response.

RAI-12

Requirement:

- 10 CFR 50.47(b)(8) requires adequate emergency facilities and equipment to support the emergency response are provided and maintained.
- Associated guidance in NUREG-0654, Section II.H, Evaluation Criterion H.3 states that a EOF [Emergency Operations Facility] is established, using current Federal guidance, from which nuclear power plant conditions are evaluated and mitigative actions are developed.
- Associated guidance in NUREG-0696, "Functional Criteria for Emergency Response Facilities," provides guidance for the EOF.

Issue: Section H.3 of Enclosure 1, Attachment 1, "Standard Emergency Plan," does not address some of the functional criteria in NUREG-0696 (e.g., function, size, structure, habitability, instrumentation, data system equipment and power supplies, etc.) for the proposed consolidated EOF.

Request: Provide justification for not addressing the functional criteria for the EOF in the Xcel SEP.

RAI 12 Response

The EOF description in the original submittal provided a level of detail associated with the applicable functional criteria for an EOF located beyond 10 miles from the plants that is generally consistent with the level of detail contained in the existing Emergency Plans. NSPM has revised Section H.3 of the SEP to include additional detail to address EOF functional criteria. The revised SEP is provided as Attachment 1 to this response.

RAI-13

Requirement:

- 10 CFR 50.47(b)(8) requires adequate emergency facilities and equipment to support the emergency response are provided and maintained.
- Associated guidance in NUREG-0654, Section II.H, Evaluation Criterion H.3 states that a EOF [Emergency Operations Facility] is established, using current Federal guidance, from which nuclear power plant conditions are evaluated and mitigative actions are developed.
- Associated guidance in NUREG-0696, "Functional Criteria for Emergency Response Facilities," provides guidance for the EOF.

Issue: The Section 3.1.7 of Enclosure 4, "Consolidation of Emergency Operations Facility," states,

> Instrumentation used to continuously monitor vital plant parameters in the MCR [main control room] is described in the site USARs [Updated Safety Analysis Reports]. Essential plant data monitoring capability is available in the emergency facilities through facility computer and display systems.

However, this does not address some of the functional criteria in NUREG-0696 (i.e., total EOF data system shall be designed to achieve an operational unavailability goal of 0.01 during all plant operating conditions above cold shutdown) for the proposed consolidated EOF.

Request: Does the EOF data system meet the operational unavailability goal as describe in NUREG-0696?

RAI 13 Response

Yes. The proposed consolidated EOF will provide sufficient redundancy in power, data network, and communications capabilities to ensure that the EOF operational availability goals are met.

RAI 14

Requirement:

- 10 CFR 50.47(b)(5) requires 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.
- 10 CFR 50.47(b)(8) requires adequate emergency facilities and equipment to support the emergency response are provided and maintained.
- Associated guidance in NUREG-0654, Section II.H, Evaluation Criterion H.3 states that 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.
- Associated guidance in NUREG-0696, "Functional Criteria for Emergency Response Facilities," as modified by NSIR/DPR-IGS-01, states in part,

> Working space for the personnel assigned to the EOF as specified in the licensee's emergency plan, including State and local agency personnel….

Issue: Item H.3 of Enclosure 1, Attachment 1, "Standard Emergency Plan," provides no discussion of State and local agency personnel.

Additionally, there is no discussion of State and local agency personnel responding to the proposed Consolidated EOF in Enclosure 4, "Consolidation of Emergency Operations Facilities."

Request: Have the States or local agencies requested or considered any changes to its coordination with Xcel for emergency response actions by staffing appropriate State or local agency responders at the proposed consolidated EOF?

RAI 14 Response

Neither States nor local agencies at this time have requested any changes to its coordination with Xcel Energy for emergency response activities.

RAI 15

Requirement:

- 10 CFR 50.47(b)(9) requires adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.
- Associated guidance in NUREG-0654, Section II.I, Evaluation Criterion I.4.a states that 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*. [emphasis added]

Issue: Item #590 of Enclosure 2, Attachment 3, "Monticello Nuclear Plant Change Justification Matrix," states in part,

> The Standard Plan maintain the commitment to provide the capability without the detailed description of the specific methodology used.

However, the proposed Xcel SEP and site-specific annexes removed significant details contained in currently approved emergency plans for the respective sites.

Request: Provide justification for not addressing the evaluation criteria in the Xcel SEP and site-specific annexes with respect to the post-accident sampling capability.

RAI 15 Response

NSPM has revised Section I.4 of the SEP and Section I.4.a of the site-specific annexes to address arrangements to obtain and analyze highly radioactive samples. Additionally, Section N.4 of the site-specific annexes has been revised to clarify the difference between site drill requirements. The revised SEP and site-specific annexes are provided in Attachments 1, 2, and 3, respectively, to this response.

RAI 16

Requirement:

- 10 CFR 50.47(b)(9) requires adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.
- Associated guidance in NUREG-0654, Section II.I, Evaluation Criterion I.10 states that 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. [emphasis added]
-

Issue: Item I.10 of Enclosure 1, Attachment 1, "Standard Emergency Plan," states in part,

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

However, the LAR proposed consolidation of the responsibilities and coordination of the local EOFs into the backup EOF.

Request: Have the States or local agencies requested or considered any changes to the coordination of the environmental radiological monitoring and assessment efforts at the proposed consolidated EOF?

RAI 16 Response

Neither the States nor the local agencies at this time have requested changes to the coordination of the environmental radiological monitoring and assessment efforts at the proposed consolidated EOF.

RAI 17

Requirement:

- 10 CFR 50.47(b)(10) requires adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.
- Associated guidance in NUREG-0654, Section II.I, Evaluation Criterion I.10 states that 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. [emphasis added]

Issue: Item I.10 of Enclosure 1, Attachment 1, "Standard Emergency Plan," states in part,

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

However, this level of detail does not provide enough information for the NRC staff to evaluate if the evaluation criteria has been met for the Xcel SEP and site-specific annexes.

Request: Provide justification for not addressing the applicable evaluation criteria in the Xcel SEP and site-specific annexes.

RAI 17 Response

NSPM has revised Section I.10 of the SEP to add specificity to this evaluation criteria. The revised SEP is provided as Attachment 1 to this response.

RAI 18

Requirement:

- 10 CFR 50.47(b)(10) requires, in part, a range of protective actions has been developed for the plume exposure pathway EPZ [emergency planning zone] for emergency workers and the public.
- Associated guidance in NUREG-0654, Section II.J, Evaluation Criterion J.1 states 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*. [emphasis added]

Issue: Item J.1 of Enclosure 1, Attachment 1, "Standard Emergency Plan," states in part,

> The implementing procedures describe….
> The implementing procedures also describe provisions made….

However, this level of detail does not provide enough information for the NRC staff to evaluate if the evaluation criteria has been met for the Xcel SEP and site-specific annexes.

Request: Provide justification for not addressing the applicable evaluation criteria in the Xcel SEP and site-specific annexes.

RAI 18 Response

NSPM has revised Section J.1 of the SEP to add specificity to this evaluation criteria. The revised SEP is provided as Attachment 1 to this response.

RAI 19

Requirement:

- 10 CFR 50.47(b)(10) requires, in part, a range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public….
- Associated guidance in NUREG-0654, Section II.J, Evaluation Criterion J.3 states the provisions for radiological monitoring and decontamination, if necessary, of personnel evacuated from the NPP site *are described.* [emphasis added]

Issue: Item J.3 of Enclosure 1, Attachment 1, "Standard Emergency Plan," states in part,

> 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.

However, Section L is for "Medical and Public Health Support," and doesn't specifically address radiological monitoring of personnel, including visitors that may be evacuated from the facility.

Request: Provide justification for not addressing the applicable evaluation criteria in the Xcel SEP and site-specific annexes.

RAI 19 Response

NSPM has revised Section J.3 of the SEP to add specificity to this evaluation criteria. The revised SEP is provided as Attachment 1 to this response.

RAI 20

Requirement:

- 10 CFR 50.47(b)(10) requires a range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public….
- Associated guidance in NUREG-0654, Section II.J, Evaluation Criterion J.5 states that provisions are made for personal radiological protection for individuals *arriving or remaining onsite* during the incident. [emphasis added]

Issue: Item J.5 of Enclosure 1, Attachment 1, "Standard Emergency Plan," states in part,

> A range of protective actions applicable to site personnel include:
> - Assembly/Accountability
> - Site Evacuation

Additionally, Item #362 to 413 of Enclosure 2, Attachment 3, "Monticello Nuclear Plant Change Justification Matrix," provides a majority of the justifications for removing the details for personal radiological protection for individuals arriving or remaining onsite during the incident as:

> The Plan standardizes the language between the three existing Plans without change in practice or intent.

Similar changes are provided in Enclosure 3, Attachment 3, "Prairie Island Nuclear Generating Plant Emergency Plan Justification Matrix."

However, this level of detail does not provide enough information for the NRC staff to evaluate if the evaluation criteria has been met for the Xcel SEP and site-specific annexes.

Request: Provide justification for not addressing the applicable evaluation criteria in the Xcel SEP and site-specific annexes.

RAI 20 Response

NSPM has revised Section J.5 of the SEP to add specificity to this evaluation criteria. The revised SEP is provided as Attachment 1 to this response.

RAI 21

Requirement:

- 10 CFR 50.47(b)(14) requires 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.
- Associated guidance in NUREG-0654, Section II.N, Evaluation Criterion N.1 states, Exercises and drills are conducted, observed, and critiqued/evaluated as set forth in NRC and FEMA regulations and guidance.
- Associated guidance in NUREG-0696, "Functional Criteria for Emergency Response Facilities," as modified by NSIR/DPR-IGS-01, states,

> Prior to the initial operation of a co-located or consolidated EOF and in at *least one drill or exercise per exercise cycle thereafter*, the EOF staff will demonstrate the ability to perform the additional co-located or consolidated EOF functions set forth in Subsection 4.1. [emphasis added]

Issue: Enclosure 4, "Consolidation of Emergency Operations Facilities," Section 3.1.3, "Staffing and training," states in part:

> The ERO staff for the proposed EOF is described in Section B.1.a of the proposed Xcel SEP (Attachment 1 to Enclosure 1), and the training program is described in its Section O.

However, the proposed Xcel SEP or site-specific annexes does not discuss the frequency of conducting this drill or exercise (e.g., per exercise cycle).

Request: Clarify the frequency for conducting a periodic drill involving simultaneous events at multiple sites to periodically test and verify functional capability of the proposed consolidated EOF to support simultaneous events at multiple sites requiring EOF activation.

RAI 21 Response

NSPM has revised the SEP to add Section N.4.l that includes a Consolidated EOF Drill to be conducted once per every eight-year exercise cycle. The drill demonstrates the ability to provide coordinated response to multi-site events. The revision to the SEP is included as Attachment 1 to this response.

RAI-22

Requirement:

- 10 CFR 50.47(b)(14) requires 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.
- Associated guidance in NUREG-0654, Section II.N, Evaluation Criterion N.3 states in part, 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….

Issue: Section N, "Exercises and Drills," of the Xcel SEP does not address whether these periodic drill or exercises will be used on a continuing basis to specifically evaluate the adequacy of the minimum staffing levels to ensure that they continue to retain the necessary key skills to perform required major functions prior to full augmentation.

Request: Describe how Xcel plans to specifically evaluate the adequacy of the minimum staffing levels to perform required functions until full augmentation, with the proposed ERO staffing changes, to ensure continued effective implementation of the respective emergency plans for each site.

RAI 22 Response

The response to RAI-4 clarified that the use of the phrase "minimum staffing" means a subset of the required facility staffing that can support facility activation and is not intended for extended facility operation. All personnel identified in Figures B-1, "TSC Organization," B-2, "OSC Organization," and B-3, "EOF Organization," are intended to respond within the respective time limits. The minimum staff, if available earlier than the facility personnel response criteria, would permit relief of the Control Room earlier than the facility response time designated in Table B-1. The staff would then perform this more limited subset of functions as the facility is staffing. Facility activation is a drill objective routinely evaluated.

This approach is consistent with the currently approved emergency plans. While the proposed change to the standard plan does include staffing changes, these changes do not impact the approach used for facility activation.

RAI-23

Requirement:

- 10 CFR 50.47(b)(16) requires responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.

Issue: Item P.3 of Enclosure 1, Attachment 1, "Standard Emergency Plan," states in part,

> …with other response organizations as shown in Figure P.1.

However, there is no Figure P.1 in the proposed Xcel SEP.

Request: Clarify if this information is correct and if so, include the referenced figure as appropriate, in the Xcel SEP and site-specific annexes.

RAI 23 Response

The reference in Section P.3 of the SEP provided in the LAR incorrectly referenced Figure P.1. NSPM has revised Section P.3 of the SEP to remove the reference to this figure. The revised SEP is provided as Attachment 1 to this response.

References

1. NSPM letter to NRC, "License Amendment Request: Standard Emergency Plan and Consolidated Emergency Operations Facility for the Monticello Nuclear Generating Plant and the Prairie Island Nuclear Generating Plant," (L-XE-21-005) dated November 15, 2021 (ADAMS Accession No. ML21320A226)

2. NRC email to NSPM, "Request for Additional Information RE: Xcel Energy Amendment Request to Create a Common E Plan and EOF for Monticello and Prairie Island," dated May 11, 2022 (ADAMS Accession No. M ML21320A265)

3. NRC to NSPM, "Monticello Nuclear Generating Plant – Issuance of Amendment Re: Revision to Monticello Nuclear Generating Plant Emergency Plan (CAC No. MF9467, EPID L-2017-LLA-0179)," dated March 5, 2018 (ADAMS Accession No. ML17349A916)

4. NRC to NSPM, "Prairie Island Nuclear Generating Plant, Units 1 and 2 – Issuance of Amendment Re: Revision to Prairie Island Nuclear Generating Plant, Units 1 and 2 Emergency Plan (CAC Nos. MF9345 and MF9346; EPID L-2017-LLA-0175)," dated March 5, 2018 (ADAMS Accession No. ML 17362A202)

5. NRC to Energy Harbor Nuclear Corp., “Perry Nuclear Power Plant, Unit No. 1 – Issuance of Amendment No. 196 Regarding Changes to the Emergency Plan (EPID L-2020-LLA-0282),” dated November 16, 2021 (ADAMS Accession No. ML21270A112)

6. NRC to Pacific Gas and Electric Company, “Diablo Canyon Nuclear Power Plant, Units 1 and 2, Issuance of Amendment Nos. 233 and 235, Re: Revision to the Emergency Plan to Change Staffing and Extend Staff Augmentation Times for Emergency Response Organization Positions (EPID-L-2018-LLA-0248),” dated August 21, 2019 (ADAMS Accession No. ML19196A309)

ENCLOSURE

ATTACHMENT 1

RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION RE: XCEL ENERGY AMENDMENT REQUEST TO CREATE A COMMON EMERGENCY PLAN AND EMERGENCY OPERATIONS FACILITY FOR MONTICELLO AND PRAIRIE ISLAND

EPLAN-01, REVISION 0

STANDARD EMERGENCY PLAN

(100 pages follow)

Xcel Energy®	EPLAN-01	Revision: 0
Emergency Preparedness Licensing Document		Page 1 of 100
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:

<u>Main Control Room (MCR)</u>

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
- Activate or confirm activation of Emergency Response Data System (ERDS)
- Perform Emergency Notification System (ENS) communications

Shift Emergency Communicator

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

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.

CONTROL ROOM	TSC	EOF
On-Shift /Emergency Director	Emergency Director	Emergency Manager
Classification →	Classification	
Notifications (State/local) →	Notifications (State/local) →	Notifications (State/local)
(Federal) →	Notifications (Federal)	
PARs →	PARs →	PARs
Emergency Exposure Controls →	Emergency Exposure Controls	

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

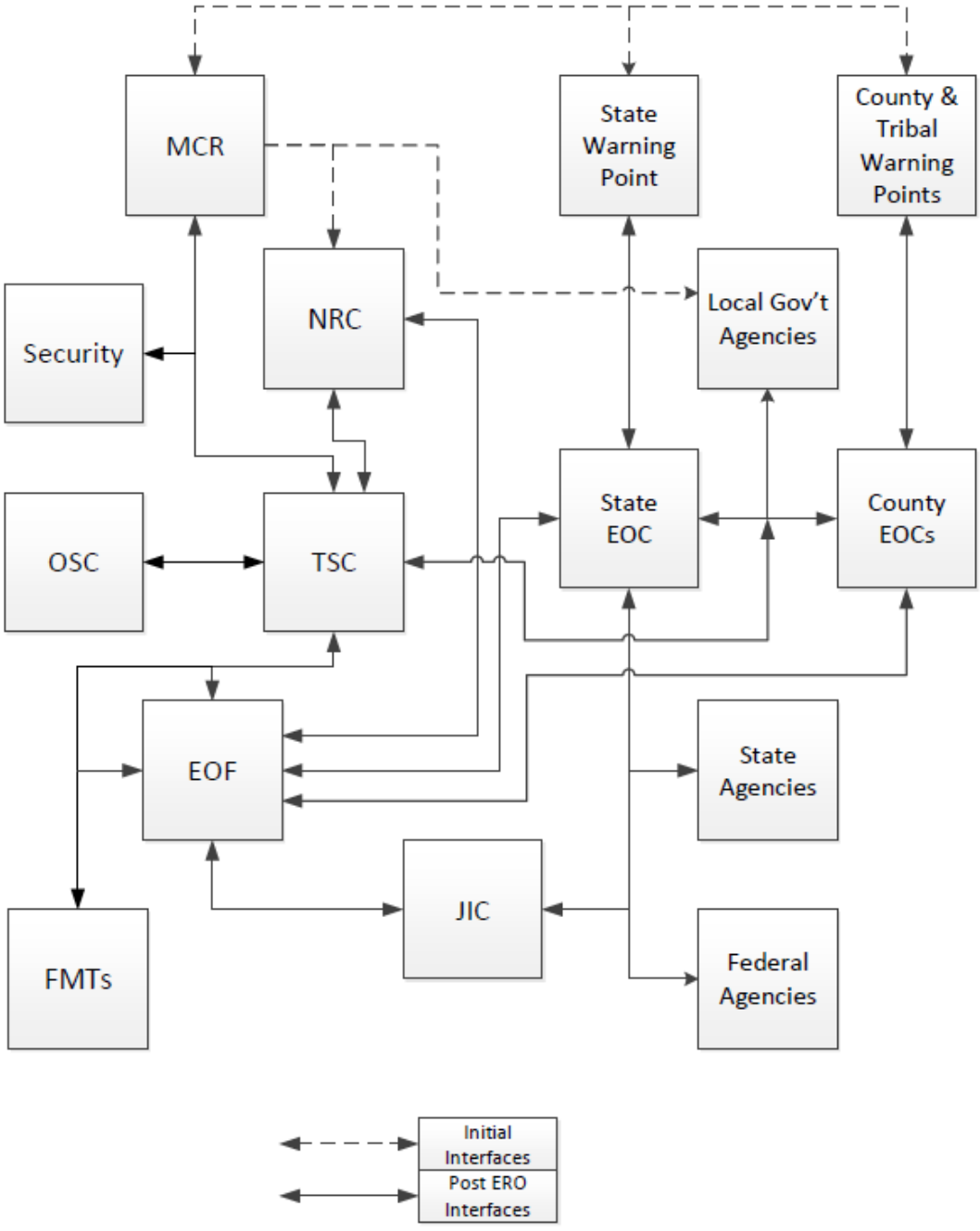


Figure B.4-1

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	------	------
		Communications (Federal)	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			**5**	**18**	**14**

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

Figure B-1, TSC Organization

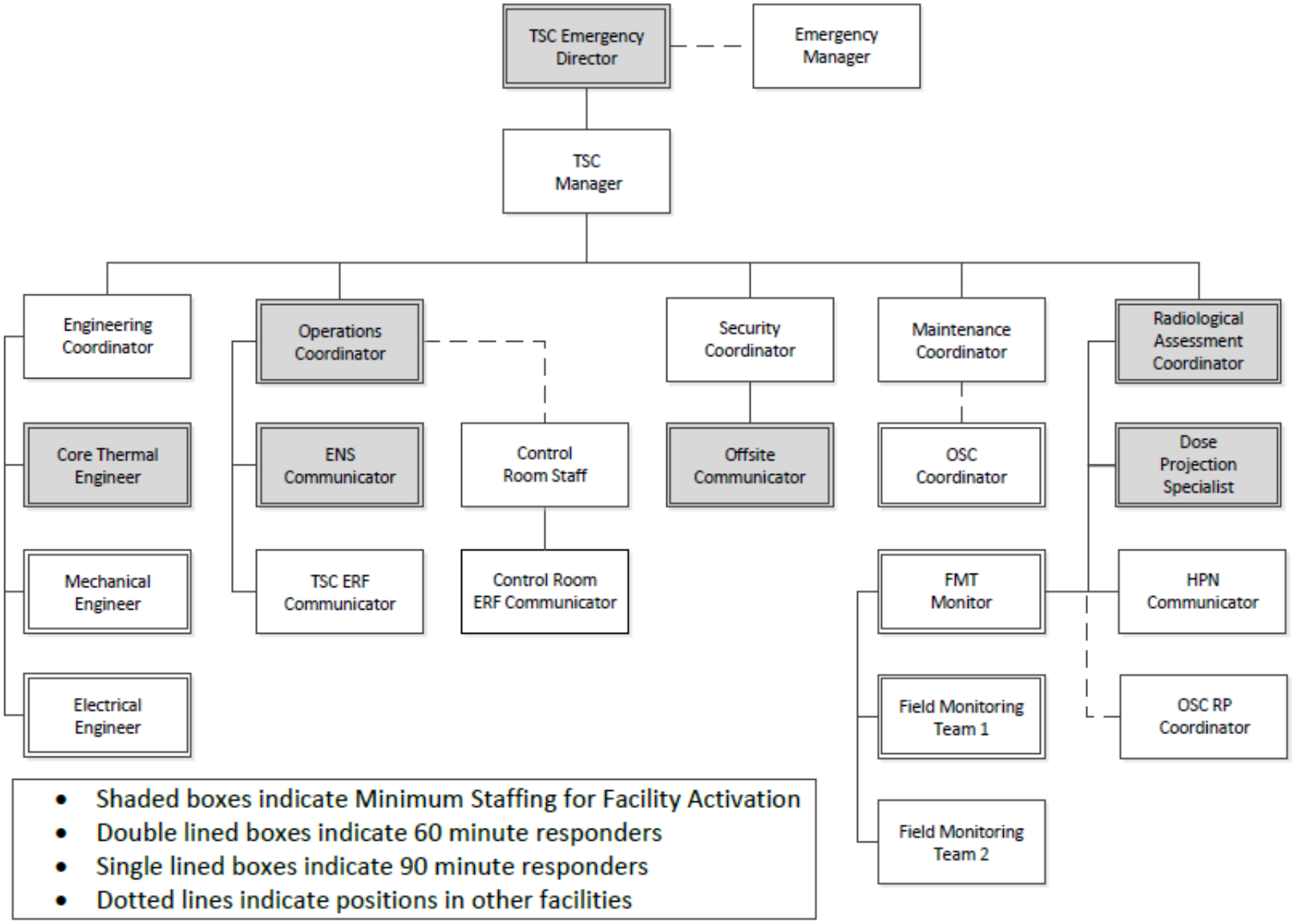


Figure B-2, OSC Organization

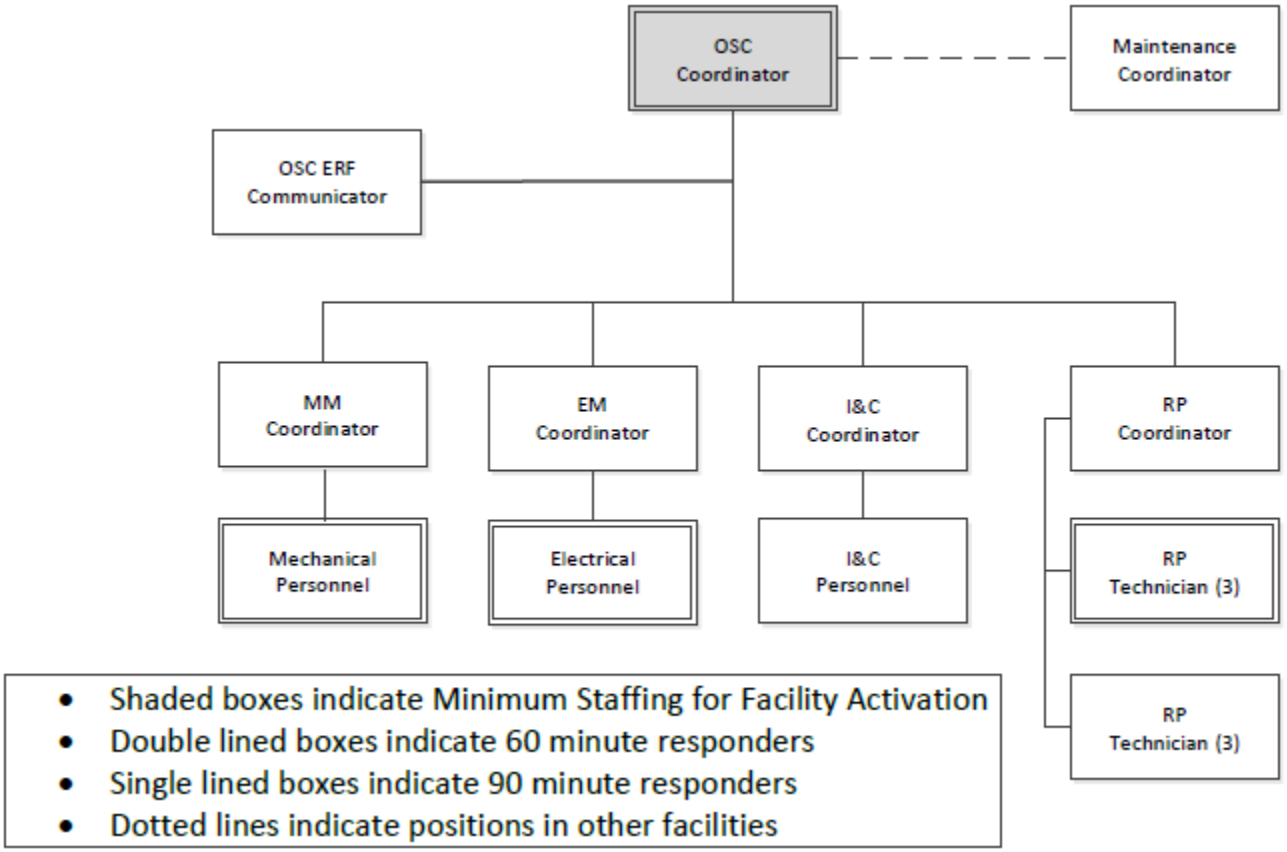


Figure B-3, EOF Organization

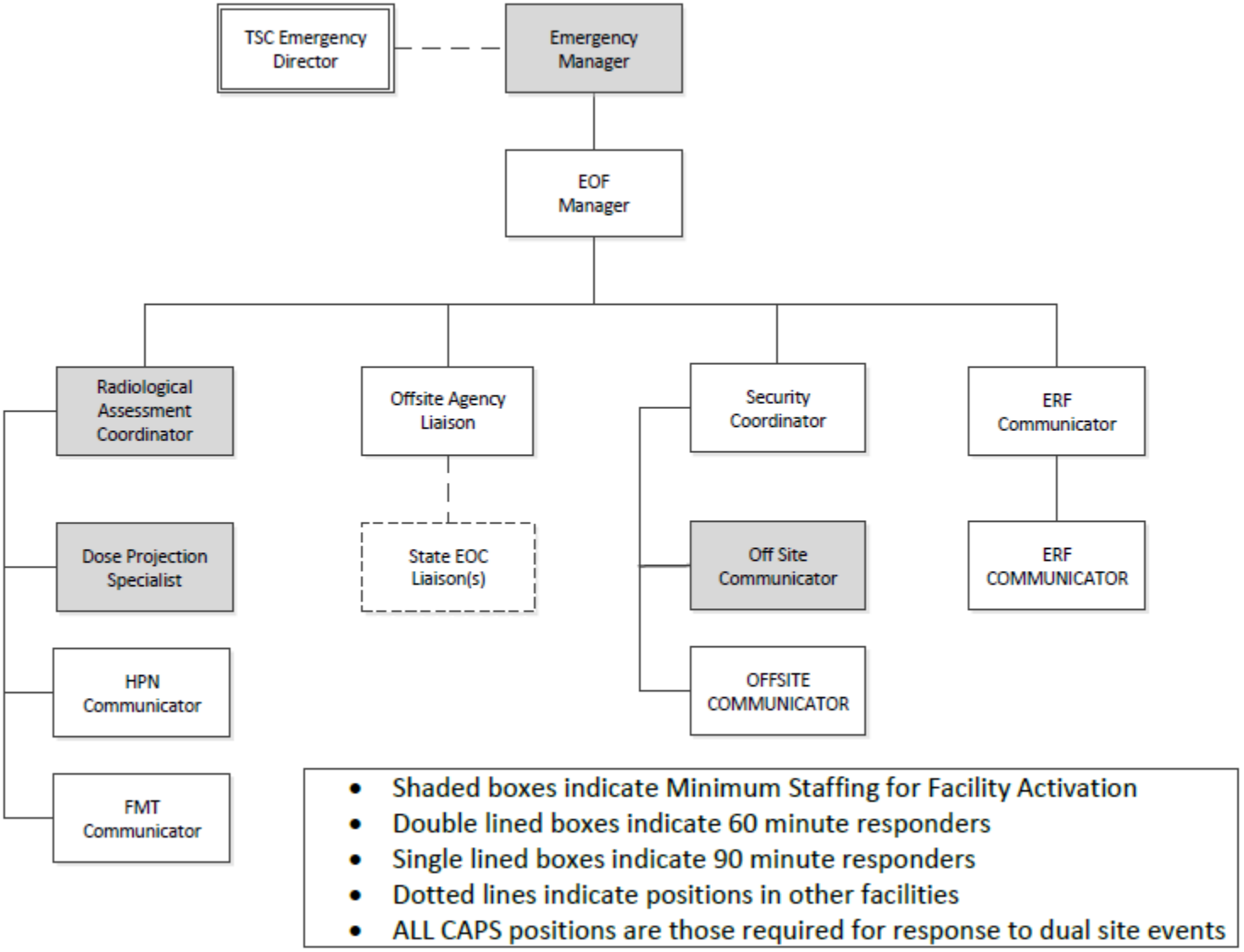
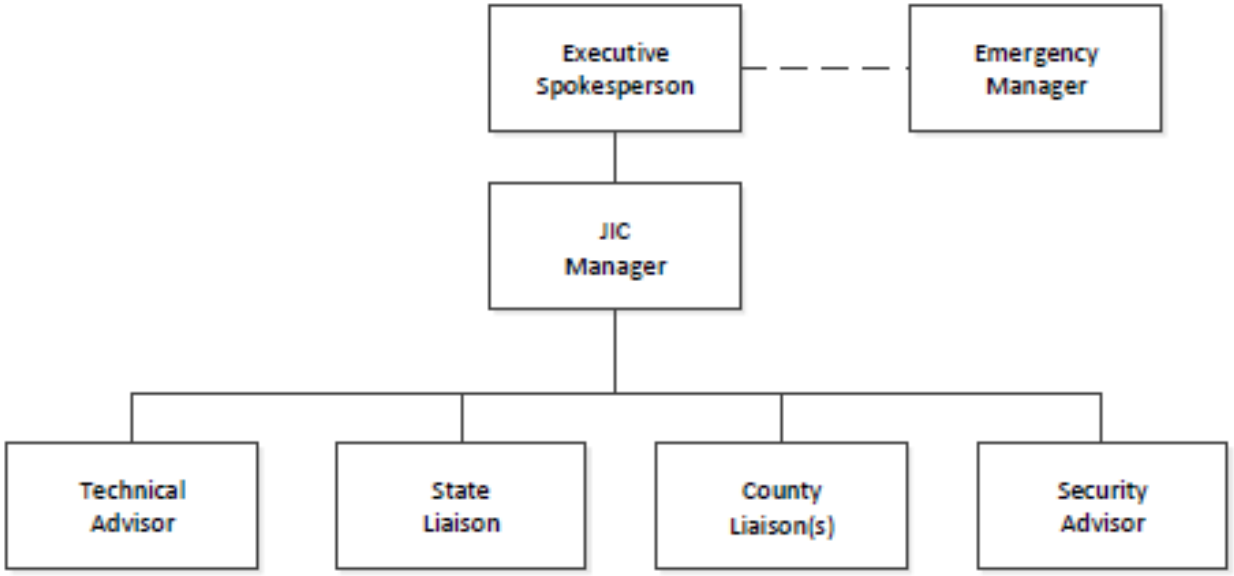


Figure B-4, JIC Organization



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 and may include items such as:

- The current ECL declaration
- Release status and type
- Offsite survey results
- Plant conditions
- Emergency response actions in progress
- Dose assessment/projection details
- Meteorological updates

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. When activated, the TSC's primary functions include:

- Prompt relief of the on-shift ERO emergency response activities
- Coordination of site emergency response actions
- Capability to display and trend plant data
- Assessment of the plant status and potential offsite impact
- Continued evaluation of event classification
- Communications with the NRC
- Communication of technical data and information to the EOF

Personnel in the TSC are protected from radiological hazards, including direct radiation and airborne contaminants under accident conditions, with radiological habitability standards similar to the MCR. To ensure adequate radiological protection, radiation monitoring equipment has been installed and periodic radiation surveys are conducted as needed during event response. These systems indicate radiation dose rates in the facility while in use. Additionally, potassium iodide (KI) is available for use.

Each TSC provides reliable voice communications to the MCR, OSC, EOF and NRC.

The TSC has the capability to display vital plant data and radiological information, in near real time, to be used by knowledgeable individuals

responsible for providing technical briefings on plant conditions, event progress and for management of overall emergency response.

The TSC has access to drawings and other records, including general arrangement diagrams, piping and instrumentation diagrams (PI&Ds), electrical schematics and plant procedures.

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 in order to minimize congestion in the MCR during event response.

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.

When the OSC is activated, dosimetry, respiratory protection, radiation survey equipment and Radiation Work Permits (RWPs) will be provided. Personnel decontamination is performed as discussed in Section K.1.e.

The OSC has access to drawings and other records, including general arrangement diagrams, piping and instrumentation diagrams (PI&Ds), electrical schematics, and plant procedures.

Emergency supplies are maintained in or accessible to the OSC Additional supplies and Xcel Energy resources can be obtained from the unaffected site upon request.

Each OSC provides reliable voice communications to the MCR, TSC and teams dispatched from the OSC.

If the OSC is deemed uninhabitable, the OSC may be moved to other locations as described in the site-specific annexes.

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. The EOF serves as a central location for management of offsite emergency response, coordination of radiological assessment and management of initial recovery operations. Access to the EOF is controlled using electronic card readers.

The EOF can accommodate designated Xcel Energy personnel as well as NRC and FEMA responders and 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.

Normal power to the EOF is from reliable offsite sources. In the event of a loss of normal power, critical EOF loads will be powered from an uninterruptible power supply (UPS) and a generator with automatic transfer.

Because the EOF is located outside the plume exposure Emergency Planning Zone for the Xcel Energy NPPs, specialized ventilation systems and radiological monitoring are not required. The EOF ventilation system is consistent in design with standard building codes.

The EOF has access to site reference materials that may be needed for supporting emergency response.

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

The EOF provides for:

- Overall management of emergency response
- Coordination of emergency response activities with federal, state and local agencies

- Coordination of offsite radiological and environmental assessments
- Development of PARs
- Notification of state/local offsite agencies
- Management of recovery actions
- Response to and coordination of response efforts for events occurring simultaneously at both MNGP and PINGP.

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 the respective Training Buildings for each site. Each near site facility provides for:

- space for an NRC site team and Federal/state/local responders
- conference areas and presentation boards for conducting briefings with emergency response personnel
- communication capability with other licensee and offsite emergency response facilities
- computer access to plant data and radiological information
- radiation monitoring capability
- 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.

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 arrangement for obtaining and analyzing highly radioactive samples are provided in Section I.4.a of the site-specific 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.

Environmental radiological monitoring, analysis, and dose projections are conducted independently by Xcel Energy and OROs in accordance with their respective Emergency Plans. The OROs respond to their respective Emergency Operations Centers (EOCs). Coordination of information is performed remotely via communications links described in Section F.1.b of the site-specific annexes.

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 during a declared emergency or other hazardous conditions. Site communication methods are available for notification of Xcel Energy personnel and members of the public onsite. Instructions are provided that describe the protective action to be taken in each instance. Alerting personnel of the condition and notification of protective actions is initiated as soon as practical upon identification of an emergency or other hazardous condition. If the event warrants initiating assembly and accountability, Security personnel are dispatched to patrol buildings and structures onsite to ensure personnel have been alerted and are reporting to the designated assembly area. The dispatch of Security patrols is described in Security procedures.

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

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.

Personnel to be evacuated from MNGP or PINGP will be directed to report to designated onsite locations for radiological monitoring and decontamination.. If radiological conditions onsite do not support monitoring and decontamination, personnel will be directed to report to established offsite monitoring and decontamination locations. The movement of personnel to an offsite monitoring and decontamination location is coordinated between Xcel Energy and the applicable ORO using established communications methods.

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.

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
- Security event related actions

Security will control access to the site in accordance with Security Procedures to ensure only authorized personnel are allowed onsite during an emergency event at an Xcel Energy NPP. Personnel responding to the site will report to designated Emergency Response Facilities. Personnel remaining onsite will be located in the Emergency Response Facilities or other specified locations to provide for their radiological protection. Accountability of onsite personnel will be maintained throughout the incident.

Actions related to site evacuation are described in Section J.1.a.

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 issuance of KI is described in implementing procedures.
Implementing procedures provide specific protective actions to take during hostile action or severe weather events.
Radiological monitoring, decontamination, and exposure control for personnel responding to the site or remaining onsite is described in Section K of the Xcel Energy SEP.

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 modification requires 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.

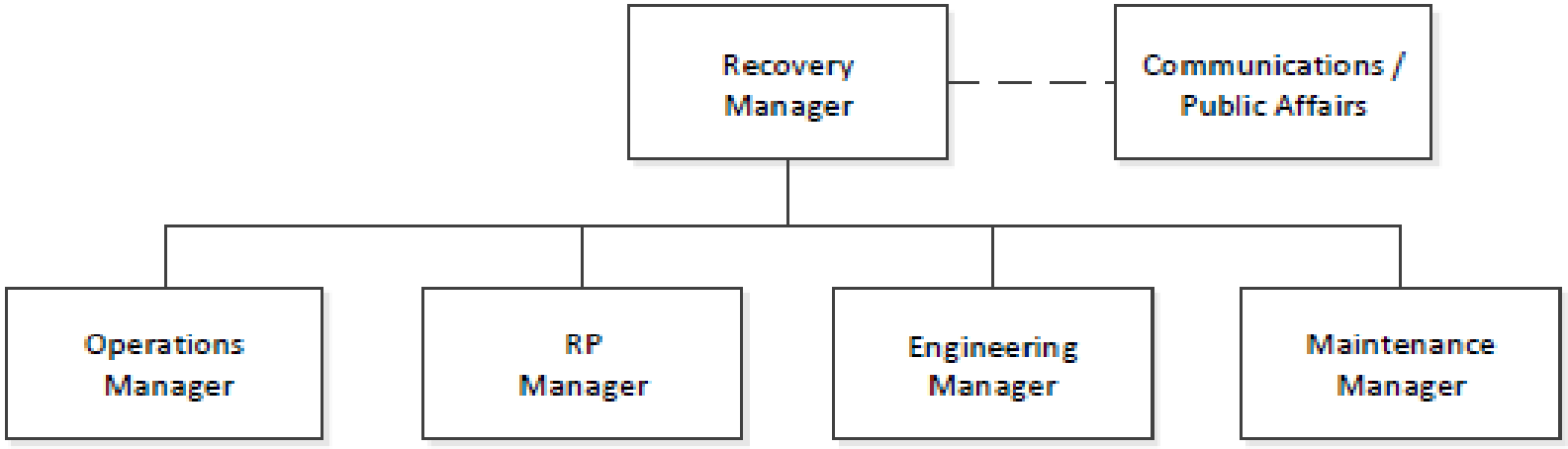
M.7	Provisions for developing and modifying sampling plans are established. Provisions for laboratory analysis of samples are included in the plan.

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 described in the site-specific annexes.

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.

N.4.l	Consolidated EOF Drill. A Consolidated EOF Drill is conducted during every eight-year exercise cycle. This drill demonstrates the ability to provide coordinated response to multi-site events.

Xcel Energy will conduct a Consolidated EOF response drill involving both nuclear sites 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.

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, SEP, Site-Specific Annex and EPIP Cross walk

NUREG-0654 Rev 2, SEP and Site-Specific Annex Section	Applicable EPIP
Assignment of Responsibility	FP-EP-EPIP-01
Emergency Response Organization	FP-EP-EPIP-01, FP-EP-EPIP-06
Emergency Response Support and Resources	FP-EP-EPIP-01, FP-EP-EPIP-04
Emergency Classification System	FP-EP-EPIP-01, FP-EP-EPIP-03
Notification Methods and Procedures	FP-EP-EPIP-01, FP-EP-EPIP-04
Emergency Communications	FP-EP-EPIP-01, FP-EP-EPIP-04
Public Education and Information	FG-EP-WI-15
Emergency Facilities and Equipment	FP-EP-EPIP-01, FP-EP-EPIP-06,
Accident Assessment	FP-EP-EPIP-01, FP-EP-EPIP-02
Protective Response	FP-EP-EPIP-01, FP-EP-EPIP-05
Radiological Exposure Control	FP-EP-EPIP-01, FP-EP-EPIP-05
Medical and Public Health Support	FP-EP-WI-28
Recovery and Reentry Planning and Post-Accident Operations	FP-EP-EPIP-01, FP-EP-EPIP-07
Exercises and Drills	FP-EP-WI-14
Radiological Emergency Response Training	PI-BEP TPD MT-BEP TPD
Responsibility for Planning Effort: Development, Periodic Review and Distribution of Emergency Plans	CD 10.1

Appendix D – Changes from Previous Revision

Revision #	Description	Date

ENCLOSURE

ATTACHMENT 2

RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION RE: XCEL ENERGY AMENDMENT REQUEST TO CREATE A COMMON EMERGENCY PLAN AND EMERGENCY OPERATIONS FACILITY FOR MONTICELLO AND PRAIRIE ISLAND

EPLAN-02, REVISION 0

MONTICELLO PLAN ANNEX

(17 pages follow)

Xcel Energy®	EPLAN-02	Revision: 0
Emergency Preparedness Licensing Document		Page 1 of 17
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	

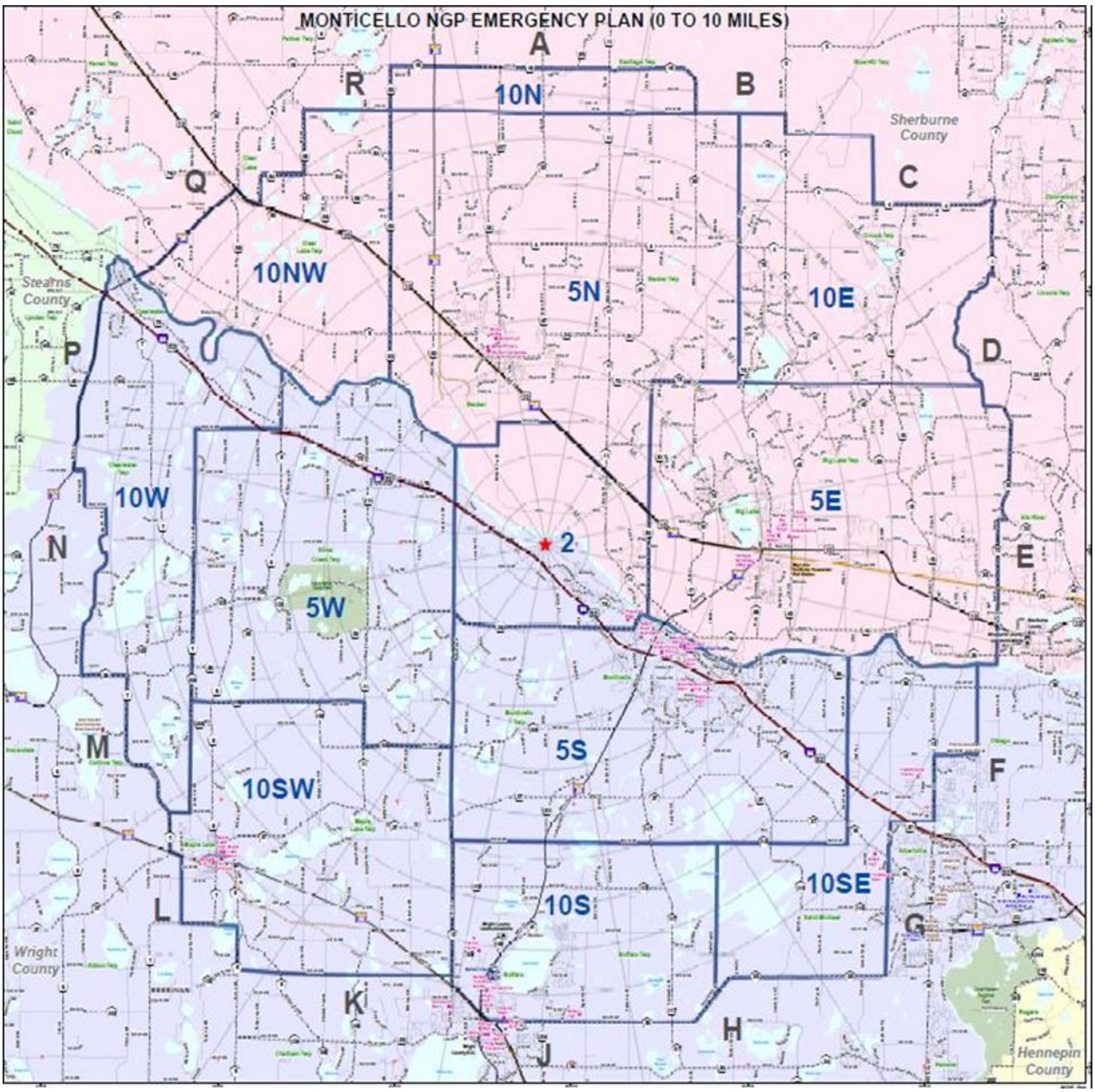


Figure 1 – MNGP 10-Mile Plume Exposure Pathway Zone (EPZ)

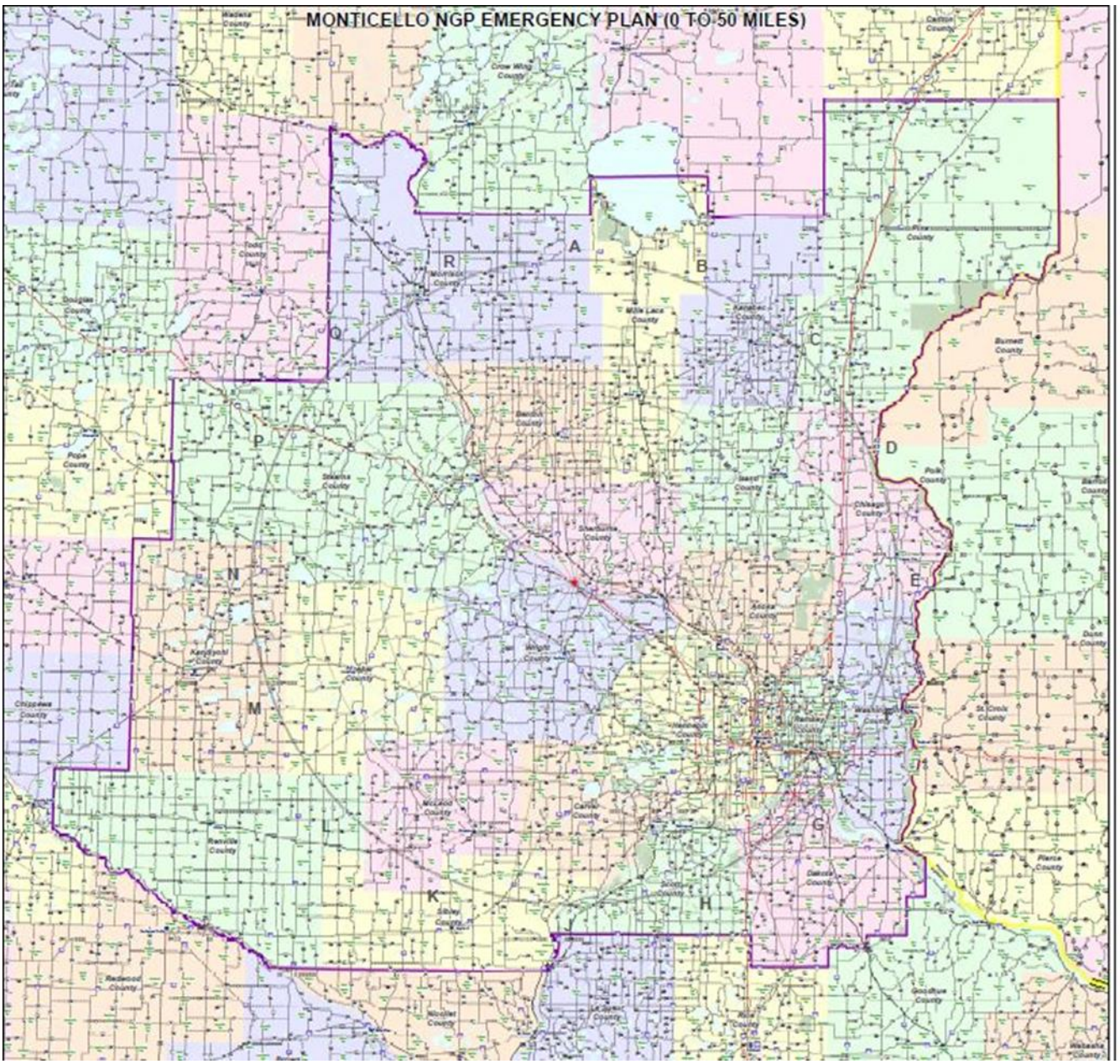


Figure 2 – MNGP 50-Mile Ingestion Pathway (IPZ)

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 within the Protected Area on the first level of the Plant Engineering Building (PEB). The facility provides working space for a minimum of twenty-five people.

The TSC is provided reliable power from offsite sources. In the event of a loss of normal power, critical TSC components will be powered from an uninterruptible power supply (UPS) and a generator with automatic transfer capability.

The TSC has been designed to have the similar habitability as the MCR. The TSC structure provides shielding for TSC personnel. The TSC ventilation system provides filtered and temperature controlled air to the TSC. The ventilation system design maintains a slight positive pressure in the TSC with filtration provided by HEPA filters and charcoal absorbers. Radiological monitoring of the TSC is provided by airborne and area radiation monitors.

If the TSC becomes uninhabitable, responders will report to the Alternative facility described in Section H.4.

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.

If determined to be uninhabitable, the OSC will be moved to the Alternative Facility described in H.4 or to another location as deemed appropriate by the OSC Manager.

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.

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).

Laboratory Facilities

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.

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.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

MNGP maintains the ability to obtain and analyze highly radioactive samples. The capability includes the ability to obtain large and small volume liquid coolant samples from jet pumps and RHR pumps as well as gas samples from the drywell and torus. The sampling and analysis facility is located outside of secondary containment to enhance accessibility. Local shielding and area radiation monitoring are also provided to protect the operator. Collection and analysis of highly radioactive samples is performed in accordance with Chemistry procedures.

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.

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.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.

By letter dated March 19, 2003, the Commission issued Amendment No. 136 to Facility Operating License No. DPR-22 for the Monticello Nuclear Generating Plant which deleted TS 6.8.C, "Post Accident Sampling," and thereby eliminated the requirements to have and maintain the post-accident sampling system at MNGP. Therefore, Criterion N.4.g is not applicable to MNGP.

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

ATTACHMENT 3

RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION RE: XCEL ENERGY AMENDMENT REQUEST TO CREATE A COMMON EMERGENCY PLAN AND EMERGENCY OPERATIONS FACILITY FOR MONTICELLO AND PRAIRIE ISLAND

EPLAN-03, REVISION 0

PRAIRIE ISLAND PLAN ANNEX

(19 pages follow)

Xcel Energy®	EPLAN-03	Revision: 0
Emergency Preparedness Licensing Document		Page 1 of 19
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.

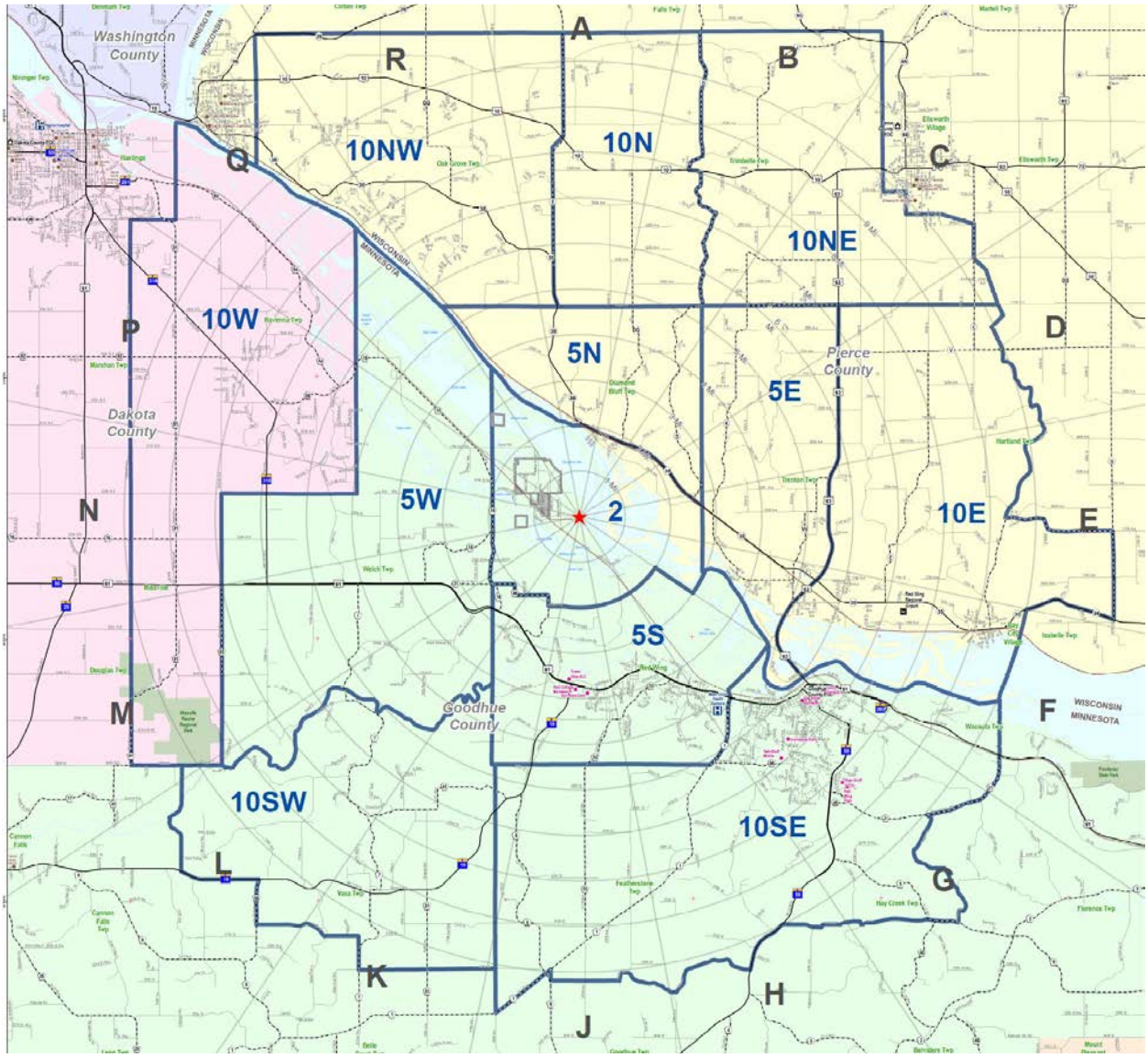


Figure 1 – PINGP 10-Mile Plume Exposure Pathway Zone (EPZ)

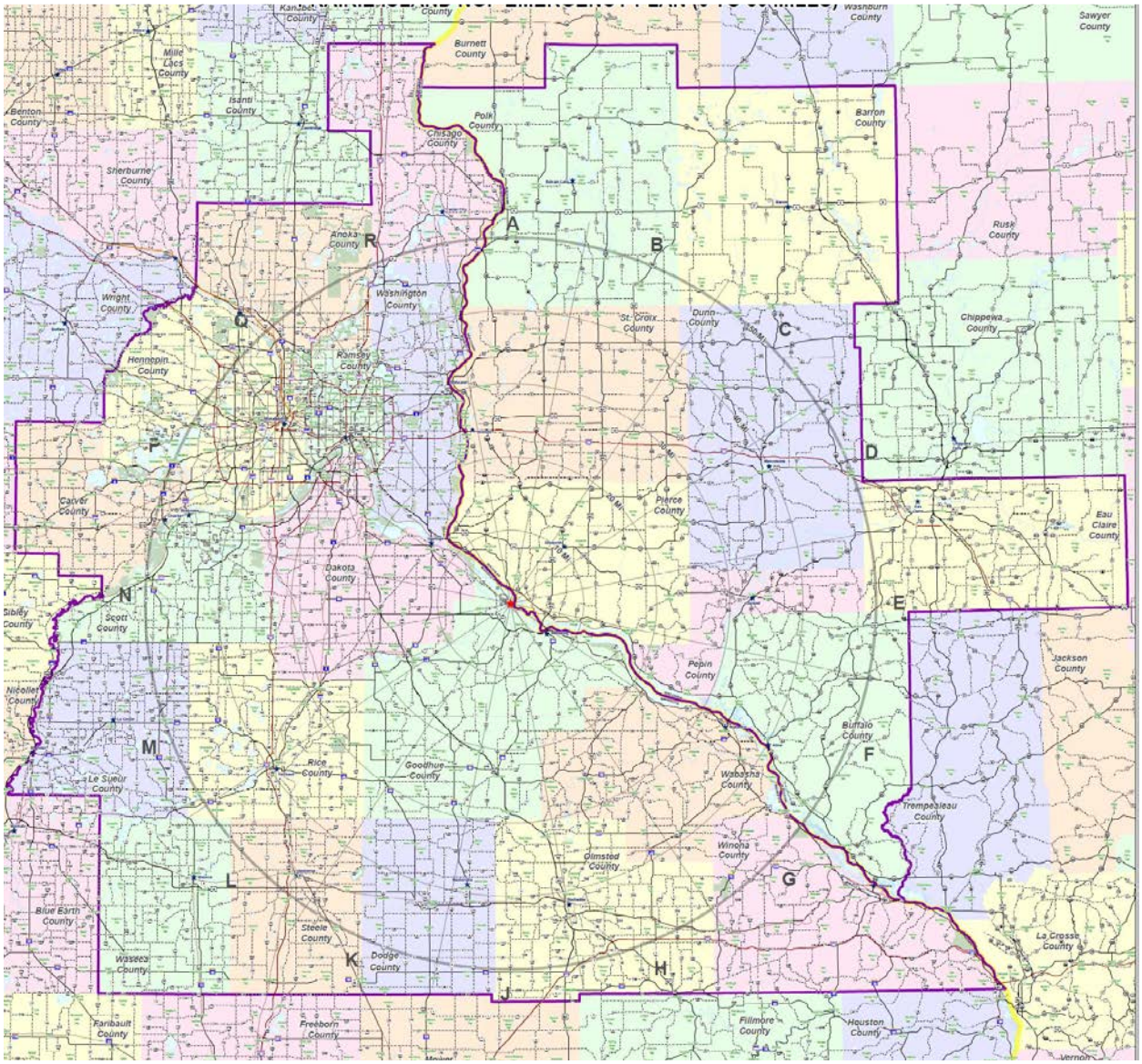


Figure 2 – PINGP 50-Mile Ingestion Pathway Zone (IPZ)

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 within the Protected Area across the Turbine Building from Units 1 & 2 Control Room. The facility provides working space for about twenty-five people on the main floor and working space for additional people on the other floor.

The TSC is provided reliable power from offsite sources. In the event of a loss of normal power, critical TSC components will be powered from an uninterruptible power supply (UPS) and a generator with automatic transfer capability.

The TSC has been designed to have the similar habitability as the MCR. The TSC structure provides shielding for TSC personnel. The TSC ventilation system provides filtered and temperature controlled air to the TSC. The ventilation system design maintains a slight positive pressure in the TSC with filtration provided by HEPA filters and charcoal absorbers. Radiological monitoring of the TSC is provided by an airborne and an area radiation monitor.

If the TSC becomes uninhabitable, responders will report to the Alternative facility described in Section H.4.

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.

If determined to be uninhabitable, the OSC will be moved to the Alternative Facility described in H.4 or to another location as deemed appropriate by the OSC Manager.

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.

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.

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.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

A post-accident sampling system (PASS) is installed at Prairie Island with associated procedures to provide the capability to obtain and analyze highly radioactive RCS liquid samples and containment atmosphere samples. The PASS incorporates exposure reduction capabilities to include a shielded sample panel, shielded sample lines and drains, shielded sample carriers, shielded work area with filtered exhaust hood, remote analysis lab, and remote counting labs with geometries for counting extremely high-level radioactivity samples.

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.

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.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.

Post-accident sampling drills are conducted annually. These drills address capabilities including analysis of liquid and containment atmosphere samples with simulated elevated radiation levels.

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

ATTACHMENT 4

RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION RE: XCEL ENERGY AMENDMENT REQUEST TO CREATE A COMMON EMERGENCY PLAN AND EMERGENCY OPERATIONS FACILITY FOR MONTICELLO AND PRAIRIE ISLAND

XCEL ENERGY PROPOSED EMERGENCY RESPONSE ORGANIZATION (ERO) POSITION ANALYSIS

RESPONSE TO RAI-5

(6 pages follow)

Introduction

In 2012, Monticello Nuclear Generating Plant (MNGP) and Prairie Island Nuclear Generating Plant (PINGP) completed a job analysis of key ERO positions based on the criteria established in INPO ACAD 15-010, *Guidelines for the Training and Qualification of Emergency Response Personnel*. That analysis established the site inventory of functions and tasks and associated training frequencies that served as the basis for the ERO training and qualification program at each site.

In April 2022, Xcel Energy submitted a proposed Standard Emergency Plan (SEP) and site-specific Annexes to the NRC. The proposed SEP included a single ERO common to both sites as well as establishment of a consolidated Emergency Operations Facility (EOF).

To document the transition from the site-specific ERO to the proposed common ERO, a position review was completed to ensure that Emergency Planning (EP) Functions as defined in NUREG-0654, Revision 2 Table B-1, were appropriately dispositioned in the SEP. This review was also used in the development of functionally based procedures and training program document for the proposed ERO positions to ensure continued alignment with INPO ACAD 15-010 criteria. A summary of the review was included for affected ERO positions for MNGP and PINGP in Enclosure2, Attachment 4 and Enclosure 3, Attachment 4 respectively, of the LAR.

Additional analysis of the following MNGP ERO positions -

- TSC Monitoring Section Leader (MNGP TSC)
- Assistant EOF Coordinator/Agency Liaison (MNGP EOF)
- EOF Assistant RP Support Supervisor (MNGP EOF)

was completed and is provided here as objective evidence requested in NRC RAI-5.

Analysis Process

The analysis reviewed the functions/tasks performed by the afore listed positions as described in the Plan, EPIPs or other site-specific guidance document and identified whether the task was

- an EP Function as defined by NRC NUREG-0654, Revision 2, Table B-1, or
- related to Emergency Response as identified by INPO ACAD 15-010

Table 1 of this Analysis shows a comparison between the NUREG-0654 Revision 2, Table B-1 and INPO ACAD 15-010 criterion.

The analysis further determined whether the task was providing relief or support to on-shift or emergency response facility personnel. Finally, the analysis reviewed the regulatory basis for each position to identify proper dispensation for each of the functions/tasks.

Conclusions

The detailed analysis requested shows that the tasks provided by those positions identified in RAI-5 provide administrative support functions or that Plan functions previously performed by these positions have been transferred to other ERO positions identified in the Proposed Plan and can be performed successfully to implement the Plan.

NRC Guidance Document and INPO ACAD Comparison

NUREG-0654 Table B-1 EP Functions	INPO ACAD 15-010 Emergency Response Functions
Command and Control • Provide overall ERO command and control, until relieved. • Approve emergency action level (EAL) and/or PAR classifications, until relieved. • Authorize personnel dose extensions, until relieved	Emergency Direction and Control • Command and control transfer • Provide overall direction on procedure implementation • Establish priorities • Coordinate onsite/offsite response • Develop plans for Recovery
Communication • Communicate EAL and PAR classifications OROs, including the NRC, until relieved	Emergency Communications • Provide Radiological info to OROs • Provide Plant/Rad. information to the NRC • Provide Plant conditions to other organizations • Provide Information to the ERO
Radiation Protection • Provide qualified RP coverage for responders • Provide in-plant surveys • Control dosimetry and radiologically controlled area access	Protective Action • PAR development • Onsite protective measures including maintaining radiological access control and providing job coverage for repair and corrective action teams • Monitor/control radiation exposures including issuance of dosimetry
Supervision of RP • Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs, until relieved. • Recommend onsite protective actions and offsite PARs to the applicable decisionmaker, until relieved. • Direct all radiation protection activities, including field monitoring teams (FMTs) • Provide relevant information to applicable communicators who are communicating offsite PARs to OROs, until relieved.	Emergency Direction and Control • Coordinate response to concurrent emergency conditions or long-duration events • Determine and communicate priority of actions necessary to mitigate event consequences • Direct actions in execution of decisions Protective Action • Authorize issuance of KI
Dose Assessment/Projection • Perform dose assessments/projections and provide input to applicable PAR decisionmaker, until relieved.	Accident Assessment • Perform radiological assessment including dose assessment and dose projection calculations.
Classification • Evaluate plant conditions and recommend emergency classifications, until relieved.	Plant Operations and Shift Staff Response • Classify the event based on emergency action level (EAL) threshold exceeded

NUREG-0654 Table B-1 EP Functions	INPO ACAD 15-010 Emergency Response Functions
Engineering • Provide engineering coverage related to the specific discipline of the assigned engineer, until relieved.	Accident Assessment • Perform technical accident assessments including monitoring system status and logic to maintain the core cooling flowpath and core damage assessment
Security	Augmented Emergency Response Capability • Staffing and facility activation • Dissemination of emergency information • Coordination of onsite/offsite response • Request assistance as needed
Repair Team Activities	Augmented Emergency Response Capability • Coordinate repair and damage control teams Accident Assessment • Perform technical assessments including recommending equipment repair and corrective actions
Supervision of Repair Team Activities	Emergency Direction and Control • Determine and communicate priority of the actions necessary to mitigate events
Field Monitoring Teams (FMTs)	Accident Assessment • Perform radiological assessments including conduct of plume tracking and radiological assessments and input for PARs
Media Information • Manage and coordinate media information related to the event.	Augmented Emergency Response Capability • Disseminate emergency information to the public including designation of a public spokesperson and approval for information included in press releases, media briefings and social media.
Information Technology (IT) [6] • If emergency plan functions rely on computer-based equipment, provide IT support. 6 - IT staff is only required to be described in the emergency plan if critical digital assets are identified per 10 CFR 73.54.	Not Applicable

Job Position: Monitoring Section Leader		**Site/Facility: Monticello, TSC**		
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Coord offsite surveys/sampling	Yes	Yes	No	Yes
2. Direct onsite surveys	Yes	Yes	No	Yes

Historical Information:

Is this an SER Approved position? Yes

The Monitoring Section was included as part of the TSC ERO in the 1982, Revision 2, SER approved MNGP Emergency Plan. This section was a subgroup of the Health Physics Group in that facility and was responsible for staffing of offsite monitoring teams until this function was transferred to the EOF. The Monitoring Section Leader position was modified in Revision 50 of the Plan which separated the Chemistry and RP functions with both reporting to the Radiological Emergency Coordinator in the TSC. The Monitoring Section Leader provided oversight for the Dose Projection Specialist, Field Monitoring Communicator and HPN Communicator as part of this change approved by NRC SER, dated March 5, 2018.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:

Is the performance of the activity unique to the position? No

Overall coordination of RP emergency response activities, including onsite monitoring is also the responsibility of the REC in the TSC.

Is the function/task necessary for implementation of the proposed Plan? Yes

In the current Plan, the Radiological Emergency Coordinator (REC) is responsible for both the chemistry and RP response activities in the TSC. To facilitate the required level of oversight, the Monitoring Section Leader and Chemistry Section Leader provided direct oversight to their respective areas. Under the proposed change, the Chemistry Section Leader position is removed from the TSC organization as chemistry activities are governed by processes outside the Emergency Plan. This results in a reduction in scope for the REC, now renamed the Radiological Assessment Coordinator (RAC), and so eliminates the need for secondary oversight provided by the current Monitoring Section Leader for the dose assessment, field monitoring team and HPN communication functions.

Dispensation:

Oversight of the Dose Projection Specialist, HPN Communicator and FMT Monitor as well as communication with the OSC RP Coordinator can be performed by the RAC in the TSC without additional support from the Monitoring Section Leader. The proposed change streamlines the organization so that radiological information needed for offsite protective action recommendations is transmitted directly to the RAC from the team members. Additionally, the subsequent transition of the dose assessment and dose assessment oversight functions to the EOF RAC provides further relief of the TSC RAC responsibilities such that the Monitoring Section Leader position is no longer required. Performance of direction and oversight functions by the RAC continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Assistant EOF Coordinator / Agency Liaison		**Site/Facility: Monticello, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Conduct activities as directed by the EOF Coordinator	No	No	No	Yes
2. Perform as Agency Liaison	Yes	No	No	Yes

Historical Information:

Is this an SER Approved position? Yes

The Assistant EOF Coordinator/Agency Liaison was added to the MNGP Emergency Plan in Revision 50 as part of the ERO alignment established between the Xcel Energy NPPs. This position combined activities associated with general logistics support provided by the PI Assistant EOF Coordinator position and the MNGP Agency Liaison position in the EOF that served as the initial interface with offsite organizations.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:

Is the performance of the activity unique to the position? No

Line 1 - Administrative assignments from the EOF Coordinator are administrative in nature and not unique to this position.

Line 2 - Agency Liaison activities are unique to this position under the current MNGP emergency plan.

Is the function/task necessary for implementation of the proposed Plan? Yes

The proposed SEP maintains the EOF Coordinator, renamed EOF Manager, for performance of activities associated with facility management. Additionally, the proposed SEP establishes the Offsite Agency Liaison as a new position in the EOF.

Dispensation:

Performance of Agency Liaison duties by the new position in the EOF as established in the proposed SEP continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Assistant RP Support Supervisor		**Site/Facility: Monticello, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
Ensure conduct of periodic surveys in occupied areas of the EOF	Yes	Yes	No	Yes
Ensure set up and operation of EOF dosimeter area rad monitor	Yes	Yes	No	Yes
Coordination for setup and operation of the EOF receiving area for receipt of radioactive samples.	Yes	Yes	No	Yes
Ensure periodic surveys are conducted within the facility and posted	Yes	Yes	No	Yes
Ensure EOF ventilation is placed in emergency mode as needed	Yes	Yes	No	Yes
Ensure dosimetry is issued to personnel in the EOF if exposures are expected to exceed 10 mR DDE	Yes	Yes	No	Yes
Review access control logs to determine exposure limits for EOF personnel	Yes	Yes	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The Assistant RPSS was added to the Monticello Emergency Plan in Revision 50 as part of the ERO alignment established between the Xcel Energy NPPs.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activities unique to the position? No
Activities associated with facility habitability and personnel monitoring are no longer required under the proposed SEP. Activities associated with radioactive sample collection and analysis will be performed by chemistry personnel onsite.
Are the functions/tasks necessary for implementation of the proposed Plan? No
With the relocation of the EOF to a location greater than 25 miles from the Xcel Energy NPPs, there is no requirement for radiological monitoring of personnel and the facility. Collection and analysis of samples will be performed in accordance with existing chemistry procedures.

Dispensation:
The Assistant RPSS supports coordination of EOF activities such as personnel monitoring and habitability surveys. Performance of personnel and facility radiological monitoring is not required at the consolidated EOF as this facility is >25 miles from either Xcel Energy NPP and so provides for a reduction in workload that eliminates the need for the Assistant RPSS position.
The proposed SEP eliminates the Assistant RPSS and renames the RPSS position in the EOF as the Radiological Assessment Coordinator (RAC). Performance of direction and coordination of RP Support Group activities including offsite does projection and assessment functions by the RAC continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

ENCLOSURE

ATTACHMENT 5

RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION RE: XCEL ENERGY AMENDMENT REQUEST TO CREATE A COMMON EMERGENCY PLAN AND EMERGENCY OPERATIONS FACILITY FOR MONTICELLO AND PRAIRIE ISLAND

XCEL ENERGY PROPOSED EMERGENCY RESPONSE ORGANIZATION (ERO) POSITION ANALYSIS

RESPONSE TO RAI-6

(40 pages follow)

Introduction

Introduction

In 2012, Monticello Nuclear Generating Plant (MNGP) and Prairie Island Nuclear Generating Plant (PINGP) completed a job analysis of key ERO positions based on the criteria established in INPO ACAD 15-010, *Guidelines for the Training and Qualification of Emergency Response Personnel*. That analysis established the site inventory of functions and tasks and associated training frequencies that served as the basis for the ERO training and qualification program at each site.

In April 2022, Xcel Energy submitted a proposed Standard Emergency Plan (SEP) and site-specific Annexes to the NRC. The proposed SEP included a single ERO common to both sites as well as establishment of a consolidated Emergency Operations Facility (EOF).

To document the transition from the site-specific ERO to the proposed common ERO, a position review was completed to ensure that Emergency Planning (EP) Functions as defined in NUREG-0654, Revision 2 Table B-1, were appropriately dispositioned in the SEP. This review was also used in the development of functionally based procedures and training program document for the proposed ERO positions to ensure continued alignment with INPO ACAD 15-010 criteria. A summary of the review was included for affected ERO positions for MNGP and PINGP in Enclosure2, Attachment 4 and Enclosure 3, Attachment 4 respectively, of the LAR.

Additional analysis of the MNGP and PINGP ERO positions -

- Safety Parameter Display System (SPDS) Operator (MNGP TSC)
- Trending (MNGP TSC)
- Support Group Leader (MNGP TSC)
- Support Group (MNGP TSC)
- Radiation Protection (RP) Status Board (MNGP EOF)
- SPDS Operator (MNGP EOF)
- Trending (MNGP EOF)
- Support Staff (MNGP EOF)
- Assembly Point Coordinator (PINGP TSC)
- Radiological Emergency Coordinator Assistant (PINGP TSC)
- Operations Group Leader Assistant (PINGP TSC)
- TSC Coordinator Assistant (PINGP TSC)
- Work Management Leader (PINGP TSC)

- Logistics Support Leader (PINGP TSC)
- Emergency Response Computer System Operator (PINGP TSC)
- Status Board Keeper (PINGP TSC)
- Record Log Keeper (PINGP TSC)
- Ops Advisor (refers to use of on-shift and personnel and the TSC Operations Coordinator) (PINGP OSC)
- Status Board Keeper (PINGP OSC)
- RP Support Supervisor Assistant -State Liaison (assigned responsibilities to Radiological Assessment Coordinator) (PINGP EOF)
- RP Support Supervisor Assistant – Field Monitoring and Dose Assessment (PINGP EOF)
- Rad Status Board Keeper (PINGP EOF)
- EOF Coordinator Assistant (PINGP EOF)
- Administrative Support Lead (PINGP EOF)
- Administrative Support Staff (PINGP EOF)
- Status Board Keeper (PINGP EOF)
- Trending Team Leader (PINGP EOF)
- Emergency Response Computer System Operator (PINGP EOF)
- Event Status Board Keeper (PINGP EOF)
- Narrative Log Keeper (PINGP EOF)

was completed and is provided here as objective evidence requested in NRC RAI-6.

Analysis Process

The analysis reviewed the functions/tasks performed by the afore listed positions as described in the Plan, EPIPs or other site-specific guidance documents and identified whether each task was:

- an EP Function as defined by NRC NUREG-0654, Revision 2, Table B-1, or
- related to Emergency Response as identified by INPO ACAD 15-010

Table 1 of this Analysis shows a comparison between the NUREG-0654 Revision 2, Table B-1 and INPO ACAD 15-010 criterion.

The analysis further determined whether the task was providing relief or support to on-shift or emergency response facility personnel. Finally, the analysis reviewed the regulatory basis for each position to identify proper dispensation for each of the functions/tasks.

Conclusions

The detailed analysis requested shows that the tasks provided by those positions identified in RAI 6 provide administrative support functions or that Plan functions previously performed by these positions have been transferred to other ERO positions identified in the Proposed Plan and can be performed successfully to implement the Plan.

Table 1 - NRC Guidance Document and INPO ACAD Comparison

NUREG-0654 Table B-1 EP Functions	INPO ACAD 15-010 Emergency Response Functions
Command and Control • Provide overall ERO command and control, until relieved. • Approve emergency action level (EAL) and/or PAR classifications, until relieved. • Authorize personnel dose extensions, until relieved.	Emergency Direction and Control • Command and control transfer • Provide overall direction on procedure implementation • Establish priorities • Coordinate onsite/offsite response • Develop plans for Recovery
Communication • Communicate EAL and PAR classifications OROs, including the NRC, until relieved.	Emergency Communications • Provide Radiological info to OROs • Provide Plant/Rad. information to the NRC • Provide Plant conditions to other organizations. • Provide Information to the ERO
Radiation Protection • Provide qualified RP coverage for responders. • Provide in-plant surveys • Control dosimetry and radiologically controlled area access.	Protective Action • PAR development • Onsite protective measures including maintaining radiological access control and providing job coverage for repair and corrective action teams. • Monitor/control radiation exposures including issuance of dosimetry.
Supervision of RP • Evaluate and assess plant and offsite radiological data in the development of onsite protective actions and offsite PARs, until relieved. • Recommend onsite protective actions and offsite PARs to the applicable decisionmaker, until relieved. • Direct all radiation protection activities, including field monitoring teams (FMTs) • Provide relevant information to applicable communicators who are communicating offsite PARs to OROs, until relieved.	Emergency Direction and Control • Coordinate response to concurrent emergency conditions or long-duration events. • Determine and communicate priority of actions necessary to mitigate event consequences. • Direct actions in execution of decisions Protective Action • Authorize issuance of KI
Dose Assessment/Projection • Perform dose assessments/projections and provide input to applicable PAR decisionmaker, until relieved.	Accident Assessment • Perform radiological assessment including dose assessment and dose projection calculations.
Classification • Evaluate plant conditions and recommend emergency classifications, until relieved.	Plant Operations and Shift Staff Response • Classify the event based on emergency action level (EAL) threshold exceeded

NUREG-0654 Table B-1 EP Functions	INPO ACAD 15-010 Emergency Response Functions
Engineering • Provide engineering coverage related to the specific discipline of the assigned engineer, until relieved.	Accident Assessment • Perform technical accident assessments including monitoring system status and logic to maintain the core cooling flowpath and core damage assessment.
Security	Augmented Emergency Response Capability • Staffing and facility activation • Dissemination of emergency information • Coordination of onsite/offsite response • Request assistance as needed
Repair Team Activities	Augmented Emergency Response Capability • Coordinate repair and damage control teams Accident Assessment • Perform technical assessments including recommending equipment repair and corrective actions.
Supervision of Repair Team Activities	Emergency Direction and Control • Determine and communicate priority of the actions necessary to mitigate events.
Field Monitoring Teams (FMTs)	Accident Assessment • Perform radiological assessments including conduct of plume tracking and radiological assessments and input for PARs.
Media Information • Manage and coordinate media information related to the event.	Augmented Emergency Response Capability • Disseminate emergency information to the public including designation of a public spokesperson and approval for information included in press releases, media briefings and social media.
Information Technology (IT) [6] • If emergency plan functions rely on computer-based equipment, provide IT support. 6 - IT staff is only required to be described in the emergency plan if critical digital assets are identified per 10 CFR 73.54.	Not Applicable

MNGP and PINGP TSC Position Analysis

Job Position: Safety Parameter Display System (SPDS) Operator		**Site/Facility: Monticello, TSC**		
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Operate the SPDS Computer	No	No	No	Yes
2. Establish Drywell/torus/Containment trends	Yes	No	No	Yes
3. Establish trends for other parameters as needed	Yes	No	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The SPDS Operator position was added to the Monticello Emergency Plan in Revision 18, in January 1999, as part of the implementation of the site Severe Accident Mitigation Guidelines (SAMGs).

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
Although operation of the SPDS computer was a unique activity at the time this position was developed, access to plant and radiological information is now available via the Plant Process Computer System (PPCS). PPCS data is maintained on the business LAN and is available on computers in the TSC. Information once requested of the SPDS Operator is now easily retrieved by the RAC, Dose Projection Specialist, Operations Coordinator, Engineering Coordinator and Engineering staff in the TSC.

Is the function/task necessary for implementation of the proposed Plan? Yes
Plant parameter trending for event response is a key activity for performance of the EP function, accident assessment. The proposed Plan maintains the Rad. Assessment Coordinator, Dose Projection Specialist, Operations Coordinator, Engineering Coordinator and Engineering staff positions in the TSC who perform monitoring and trending of plant and radiological conditions.

Dispensation:
Performance of trending and plant monitoring is a fundamental task performed by RP, Operations and Engineering positions in the TSC. This capability continues to be available to support response to severe accidents as established by the BDB Program.
Performance of trending and monitoring tasks by the RP, Operations and Engineering positions in the TSC continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Trending		**Site/Facility: Monticello, TSC**		
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Establish RPV trends	Yes	No	No	Yes
2. Establish Drywell/torus/Containment trends	Yes	No	No	Yes
3. Establish trends for other parameters as needed	Yes	No	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The Trending position was added to the Monticello Emergency Plan in Revision 18, in January 1999, as part of the implementation of the site Severe Accident Mitigation Guidelines (SAMGs).

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
Although trending was a unique activity at the time this position was developed, access to plant and radiological trends is now available via the Plant Process Computer System (PPCS). PPCS data is maintained on the business LAN and is available on computers in the TSC. Information once requested of the Trending position is now easily retrieved by the RAC, Dose Projection Specialist, Operations Coordinator, Engineering Coordinator and Engineering staff in the TSC.

Is the function/task necessary for implementation of the proposed Plan? Yes
Plant parameter trending for event response is a key activity for performance of the EP function, accident assessment. The proposed Plan maintains the Rad. Assessment Coordinator, Dose Projection Specialist, Operations Coordinator, Engineering Coordinator and Engineering staff positions in the TSC who perform monitoring and trending of plant and radiological conditions.

Dispensation:
Performance of trending and plant monitoring is a fundamental task performed by RP, Operations and Engineering positions in the TSC. This capability continues to be available to support response to severe accidents as established by the BDB Program.
Performance of trending and monitoring tasks by the RP, Operations and Engineering positions in the TSC continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Support Group Leader		**Site/Facility: Monticello, TSC**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Direct the Security GL to initiate accountability	Yes	Yes	No	Yes
2. Direct the SM to activate the evacuation siren	Yes	Yes	No	Yes
3. Compile a list of names of on-shift personnel	No	No	No	Yes
4. Dispatch an Assembly Point Coordinator	No	No	No	Yes
5. Perform PA announcements as needed	Yes	Yes	No	Yes
6. Ensure FFD verification for ERO	Yes	Yes	No	Yes
7. Coordinate 24 hr shift schedules	No	No	No	Yes
8. Coordinate form/document completion	No	No	No	Yes
9. Verify facility staffing and notify ED	No		No	Yes

Historical Information:
Is this an SER Approved position? Yes
The Support Group Leader was included in Revision 2 of the MNGP Emergency Plan and was primarily responsible for emergency document control and oversight of the support group who provided document retrieval support for the TSC.
Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? See below
Lines 1 to 4 - No. Under the proposed Plan, activities related to assembly/accountability are the responsibility of the Security Coordinator in the TSC and are coordinated through the TSC Manager, a newly added position responsible for overall facility function.
Line 5 – No. PA announcements are completed by the Shift Manager, Security personnel or the TSC Manager
Line 6 – No. FFD verification is an administrative function that be completed by any individual assigned to support this activity.
Line 7 - Yes.
Line 8 – Yes
Line 9 - Yes
Is the function/task necessary for implementation of the proposed Plan? See below
Line 1 to 4 – Yes. These activities are being re-assigned to the Security Coordinator and TSC Manager as appropriate.
Line 5 – Yes. This activity is assigned to the TSC Manager, Security personnel or Shift Manager as appropriate
Line 6 – No. The activity is related to Security procedure implementation and is not directly related to the Emergency Plan.
Line 7 – No. Document access and retrieval can be completed electronically by ERO members in each facility when needed.

Job Position: Support Group Leader	**Site/Facility: Monticello, TSC**

Line 8 – Yes. This activity is the responsibility of the TSC Manager under the proposed SEP.
Line 9 – Yes. This activity is the responsibility of the TSC ED or TSC Manager under the proposed SEP.

Dispensation:

The document control/administrative functions related to document retrieval and storage are administrative functions and not related to any EP functions as identified in NUREG-0654 or INPO ACAD 15-010. As a result, the Support Group Leader position can be removed from the Emergency Plan in accordance with NUREG-0654, Revision 2 Table B-1, Note iii which states,

> *The minimum ERO staffing plan is that which is required to effectively implement the site specific emergency plan (i.e., the emergency plan cannot be effectively implemented without this staff). The emergency plan should only describe the minimum ERO staffing plan, while supporting implementing procedures can describe any additional staff response desired by the licensee, as this additional staff is not critical to effective emergency plan implementation.*

Document control and retrieval are administrative functions will continue to be performed by the Support Group Coordinator as directed by FP-EP-EPIP-01, Attachment 21 and does not perform any EP functions as defined in NUREG-0654 or INPO ACAD 15-010.

Performance of Assembly/Accountability, Document oversight, staffing verification and PA Announcements by the TSC Manager, Security Coordinator and Shift Manager continue to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Support Group		**Site/Facility: Monticello, TSC**		
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Document control, distribution, print and drawing retrieval	No	No	No	Yes
2. Administrative logistics support including records, status board keeper	No	No	No	Yes
3. Procurement, spare parts storage and retrieval from the warehouse	No	No	No	Yes

Historical Information:

Is this an SER Approved position? Yes

The Support Group was included in Revision 2 of the MNGP Emergency Plan and was responsible for emergency document control and oversight of the support group who provided document retrieval support for the TSC.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:

Is the performance of the activity unique to the position? No.

Procedures and drawings are maintained electronically as part of the Plant Process Computer System (PPCS). PPCS data is maintained on the business LAN and is available on computers in the TSC.

Is the function/task necessary for implementation of the proposed Plan? No

The Support Group performs administrative functions related to document retrieval and storage and does not perform any EP functions as defined in NUREG-0654 or INPO ACAD 15-010.

Dispensation:

The document control/administrative functions related to document retrieval and storage are administrative functions and not related to any EP functions as identified in NUREG-0654 or INPO ACAD 15-010. As a result, the Support Group Leader position can be removed from the Emergency Plan in accordance with NUREG-0654, Revision 2 Table B-1, Note iii which states,

> *The minimum ERO staffing plan is that which is required to effectively implement the site specific emergency plan (i.e., the emergency plan cannot be effectively implemented without this staff). The emergency plan should only describe the minimum ERO staffing plan, while supporting implementing procedures can describe any additional staff response desired by the licensee, as this additional staff is not critical to effective emergency plan implementation.*

Document control and retrieval are administrative functions will continue to be performed by the Support Group Coordinator as directed by FP-EP-EPIP-01, Attachment 21 and does not perform any EP functions as defined in NUREG-0654 or INPO ACAD 15-010.

As a result, the proposed SEP continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: RP Status Board			**Site/Facility: Monticello, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Maintain EOF RP Status Board - SPDS	No	No	No	Yes
2. Maintain status board – follow up messages	No	No	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The RP Status Board position was added in Rev 50 of the MNGP Plan as part of the ERO standardization developed for the Augmentation Staffing LAR.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
RP Status from SPDS is now available to TSC ERO personnel via Plant Parameter Computer System (PPCS). PPCS data is maintained on the business LAN and is available on computers in the TSC. Emergency Notification follow up messaging is tracked using WebEOC software which is available to ERO personnel in all emergency response facilities (ERFs).

Is the function/task necessary for implementation of the proposed Plan? Yes
Under the proposed SEP, tracking of SPDS radiological information is completed using PPCS data that is maintained on the business LAN and is available on computers in the EOF. Initial and follow up messaging is maintained by ERO personnel via WebEOC.

Dispensation:
Performance of monitoring and trending RP information from the SPDS program via PPCS as well as information from Emergency Notification Follow Up messages which is available via WebEOC. As a result, the proposed SEP continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: SPDS Operator		**Site/Facility: Monticello, EOF**		
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Operate the SPDS Computer	No	No	No	Yes
2. Establish Drywell/torus/Containment trends	Yes	No	No	Yes
3. Establish trends for other parameters as needed	Yes	No	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The SPDS Operator position was added to the Monticello Emergency Plan in Revision 18, in January 1999 as part of the implementation of the site Severe Accident Mitigation Guidelines (SAMGs).

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
Although operation of the SPDS computer was a unique activity at the time this position was developed, access to plant and radiological information is now available via the Plant Process Computer System (PPCS). PPCS data is maintained on the business LAN and is available on computers in the EOF. Information once requested of the SPDS Operator is now easily retrieved by the RAC and Dose Projection Specialist in the EOF.

Is the function/task necessary for implementation of the proposed Plan? Yes
Plant parameter trending for event response is a key activity for performance of the EP function, accident assessment. The proposed Plan maintains the RAC and Dose Projection Specialist positions in the EOF who perform monitoring and trending of plant and radiological conditions.

Dispensation:
Performance of trending and plant monitoring is a fundamental task performed by RP positions in the EOF. This capability continues to be available to support response to severe accidents as established by the BDB Program.
Performance of trending and monitoring tasks by RP positions in the EOF continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Trending		**Site/Facility: Monticello, EOF**		
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Establish RPV trends	No	No	No	Yes
2. Establish Drywell/torus/Containment trends	No	No	No	Yes
3. Establish trends for other parameters as needed	No	No	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The SPDS Operator position was added to the Monticello Emergency Plan in Revision 18, in January 1999, as part of the implementation of the site Severe Accident Mitigation Guidelines (SAMGs).

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
Although trending was a unique activity at the time this position was developed, access to plant and radiological trends is now available via the Plant Process Computer System (PPCS). PPCS data is maintained on the business LAN and is available on computers in the EOF. Information once requested of the Trending position is now easily retrieved by the RAC and Dose Projection Specialist in this facility.

Is the function/task necessary for implementation of the proposed Plan? Yes
Plant parameter trending for event response is a key activity for performance of the EP function, accident assessment. The proposed Plan maintains the RAC and Dose Projection Specialist, Operations Coordinator, Engineering Coordinator and Engineering staff positions in the TSC who perform monitoring and trending of plant and radiological conditions.

Dispensation:
Performance of trending and plant monitoring is a fundamental task performed by RP, Operations and Engineering positions in the TSC. This capability continues to be available to support response to severe accidents as established by the BDB Program.
Performance of trending and monitoring tasks by the RP, Operations and Engineering positions in the TSC continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Tech Support Staff		**Site/Facility: Monticello, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Proactive evaluation of the overall event including forecasting trends, anticipating adverse trends	Yes	Yes	No	Yes
2. Advising the Emergency Manager on the engineering and operational aspects of the event	Yes	Yes	No	Yes
3. Trending of critical plant parameters related to Containment integrity and source term and advising the Radiation Protection Support Supervisor	Yes	Yes	No	Yes
4. Support the Technical Support Center with technical information including replacement equipment and component specifications	Yes	Yes	No	Yes
5. Trend and plot critical plant variables that are identified by the EOF Group Leaders a	Yes	Yes	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The Technical Support Staff was added in Rev 50 of the MNGP Plan as part of the ERO standardization developed for the Augmentation Staffing LAR.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
These functions are performed by the engineering staff in the TSC.

Is the function/task necessary for implementation of the proposed Plan? No
Under the proposed SEP, technical support/engineering analysis are maintained in the TSC and do not transfer to the EOF upon activation of that facility. This allows the TSC to focus on plant response and allows the EOF to better focus on offsite agency interface and public protection.

Dispensation:
The TSC engineering staff maintain all the needed capability for trending of plant parameters and developing event response and mitigative strategies.
Performance of accident assessment and repair/corrective actions by the TSC engineering staff continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Assembly Point Coordinator		**Site/Facility: Prairie Island, TSC**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Verify that radiological monitoring has been established for the Assembly Point.	Yes	Yes	No	Yes
2. Coordinate activities of personnel (plant and non-plant) located at the Assembly Point.	No	No	No	Yes
3. Assist the Emergency Director in performing the accountability check, as necessary.	Yes	Yes	No	Yes
4. Maintain the communication systems. A person may be designated as the communicator, if necessary	No	No	No	Yes
5. Control the use of equipment located in the Emergency Locker.	No	No	No	Yes
6. Update personnel with appropriate information when directed by the Emergency Director.	No	No	No	Yes
7. Provide instructions to personnel when they are released from the assembly point for reentry or transport offsite.	Yes	Yes	No	Yes

Historical Information:

Is this an SER Approved position? Yes

The Assembly Point Coordinator was included as part of the TSC ERO in the 1982, Revision 2, SE approved PINGP Emergency Plan. This position was not physically located in the TSC, rather it was located in the Assembly Area for plant personnel and reports through the TSC leadership structure. Alternates for the Assembly Area Coordinator were RP Specialists or the Emergency Director. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:

Is the performance of the activity unique to the position? No

Line 1 and 5 - In the proposed SEP, radiological monitoring for the assembly point is coordinated by the Radiological Assessment Coordinator (RAC) in the TSC and performed by RP personnel. The

Job Position: Assembly Point Coordinator	**Site/Facility: Prairie Island, TSC**
emergency equipment lockers at the assembly point contain the equipment to support RP personnel activities. Line 2 - General Employee Training (GET) provides the guidance for personnel responsibilities when responding to the assembly point such that a formal oversight position is not required. Line 3 - In the proposed SEP, accountability is the responsibility of Security Coordinator in coordination with the TSC Manager. Line 4, 6 and 7- Site wide communications are provided via the public address system. Telephones are available at the assembly points for communicating information to personnel assemble there as needed. These phone communications can be performed by anyone located at the assembly point. Instructions related to radiological conditions will be coordinated by the RAC and RP personnel. Instructions related to evacuation will be coordinated by the RAC and Security Coordinator and communicated via RP and Security personnel. *Is the function/task necessary for implementation of the proposed Plan?* Yes As described above, required functions will be performed by the TSC RAC and Security Coordinator in the proposed SEP.	
Dispensation: GT directs that when site assembly and accountability is initiated, personnel with an emergency response role are to report to their designated Emergency Response Facility (ERF) and personnel without out an emergency response role report to the assembly point. GET instructs plant personnel regarding personnel responsibilities upon reporting to the assembly point. The proposed SEP eliminates the Assembly Area Coordinator position. Personnel responding to the assembly point will conduct assembly point activities in accordance with GET. Performance of direction and coordination of RP activities at the assembly point by the RAC and coordination of site evacuation activities by the RAC and Security Coordinator continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.	

Job Position: Radiological Emergency Coordinator Assistant			**Site/Facility: Prairie Island, TSC**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Assist the REC in providing oversight of radiological monitoring of personnel in the TSC.	No	No	No	Yes
2. Assist the REC in monitoring TSC habitability	No	No	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The Radiological Emergency Coordinator Assistant position was not included in the 1982, Revision 2 SE approved PINGP emergency plan. This position was added in PINGP Emergency Plan, Revision 54 as part of the ERO alignment established between the Xcel Energy NPPs.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
These functions are also performed by the REC and RP technicians in the TSC.

Is the function/task necessary for implementation of the proposed Plan? No

Dispensation:
The proposed SEP revises the title of REC to Radiological Assessment Coordinator (RAC) and maintains responsibility for oversight of radiological monitoring for plant personnel.
The oversight and coordination of radiological assessment activities by the RAC continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Operations Group Leader Assistant		**Site/Facility: Prairie Island, TSC**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Relieve Fire brigade Chief of Incident Command (if needed).	No	No	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The Operations Group Leader Assistant position was not included in the 1982, Revision 2, SE approved PINGP Emergency Plan. This position was added in PINGP Plan Revision 54 as part of the ERO alignment established between the Xcel Energy NPPs.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
The Operations Group Leader Assistant position is staffed during events for which the Alternative facility is in use. This task can be completed by any qualified member of the Operations Department and is managed by Operations and the Fire Brigade Chief.

Is the function/task necessary for implementation of the proposed Plan? No
The Operations Group Leader Assistant functions are related to activities required by the Fire Protection Program.

Dispensation:
Activities related to Incident Command Fire Chief are not EP functions as identified in NUREG-0654 or INPO ACAD 15-010 and are managed by the Fire Protection Program.
The oversight and coordination of the Operations group by the Operations Group Leader continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: TSC Coordinator Assistant		**Site/Facility: Prairie Island, TSC**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Update Emergency Declaration sign	No	No	No	Yes
2. Post magnetic "no entry" and "no exit" signs on stairway to upper TSC West door.	No	No	No	Yes
3. Verify TSC clocks are synchronized	No	No	No	Yes
4. Align TSC ventilation system for emergency operation.	Yes	Yes	No	Yes
5. Station person at lower TSC door to monitor dosimetry use when applicable.	Yes	Yes	No	Yes

Historical Information:

Is this an SER Approved position? Yes

The TSC Coordinator Assistant position was not included in the 1982, Revision 2, SE approved PINGP Emergency Plan. This position was added in PINGP Plan Revision 54 as part of the ERO alignment established between the Xcel Energy NPPs.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:

Is the performance of the activity unique to the position? Yes. Line items 1, 2 and 3 are administrative in nature. Line 4 and Line 5 implement requirements associated with facility habitability.

Is the function/task necessary for implementation of the proposed Plan? See below

Line 1, 2 and 3 – No. These activities are administrative in nature

Line 4 – This activity has been reassigned to the TSC Maintenance Coordinator under the proposed change.

Line 5 – This activity is no longer required as dosimetry monitoring is performed by the RP Technician as part of the habitability process as directed by the TSC RAC under the proposed change.

Dispensation:

Functions related to posting of signs and synchronizing clocks are administrative in nature and not related to any EP functions as identified in NUREG-0654 or INPO ACAD 15-010. As a result, the Logistics Support Leader position can be removed from the Emergency Plan in accordance with NUREG-0654, Revision 2 Table B-1, Note iii which states,

> *The minimum ERO staffing plan is that which is required to effectively implement the site specific emergency plan (i.e., the emergency plan cannot be effectively implemented without this staff). The emergency plan should only describe the minimum ERO staffing plan, while supporting implementing procedures can describe any additional staff response desired by the licensee, as this additional staff is not critical to effective emergency plan implementation.*

These administrative functions will continue to be directed by the Logistics Support leader, renamed Support Group Coordinator, as directed by FP-EP-EPIP-01, Attachment 21.

Assignment of activities related to TSC ventilation and dosimetry issuance to the TSC Maintenance Coordinator and RAC respectively continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Work Management Leader		**Site/Facility: Prairie Island, TSC**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Control, review and prepare work packages for tagging operations.	No	No	No	Yes
2. Completion of repair and corrective actions in support of emergency response.	Yes	Yes	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The TSC Work Management Leader position was added to the PINGP Emergency Plan in Revision 24 to support work package development for repair teams. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? See below
Line 1 – No. Work package development is performed by Maintenance management personnel as a normal part of plant operations. These individuals fill the Maintenance Coordinator positions in the OSC and work directly with craft personnel in developing details for repair work packages. Additionally, the TSC Maintenance Coordinator and Operations Coordinator in the TSC coordinate operations personnel needed to hang tags.
Line 2 – No. Completion of repair and corrective action activities is completed by Maintenance craft in the OSC.

Is the function/task necessary for implementation of the proposed Plan? See below
Line 1 – No. The means for briefing and dispatch of maintenance personnel from the OSC based on work priority are established in fleet EPIPs. Development of work packages is a long-term response activity.
Line 2 – Yes. Maintenance craft assigned to the OSC can complete repair and corrective actions in support of emergency response.

Dispensation:
The proposed SEP reassigns the activities of the Work Management Leader to the Maintenance and Operations Coordinators in the TSC as well as the Maintenance Coordinators and craft in the OSC. Develop of work instructions and completion of repairs and corrective actions by the Maintenance and Operations Coordinator in the TSC, as well as the OSC Maintenance Coordinator and craft continue to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Logistics Support Leader		**Site/Facility: Prairie Island, TSC**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Transport files to TSC Resource Area	No	No	No	Yes
2. Assist in distribution of faxes	No	No	No	Yes
3. Assist in notification of early dismissal	No	No	No	Yes
4. Provide administrative and document support services	No	No	No	Yes
5. Arrange for food and beverage	No	No	No	Yes
6. Assist with NRC Site Team response coordination	No	No	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The Logistics and Support Leader position was added to the PINGP emergency plan in Revision 12. This change was made to align the ERO to the plant organization. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? See below.
Line 1 – No. Files are now available electronically and do not require physical transport to the TSC for use by engineering staff.
Line 2 – No. Documents can be scanned and emailed as needed by ERO personnel.
Line 3 – No. Information related to dismissal or evacuation of site personnel is performed by site Security personnel and related notifications are provided via plant PA.
Line 4 – Yes
Line 5 – Yes
Line 6 – No. The TSC Manager position has been added as a part of the proposed SEP and performs this function.
Is the function/task necessary for implementation of the proposed Plan? See below.
Lines 1 through 5 – No
Line 6 – Yes. Under the proposed SEP, responsibility for NRC Site Team interface is assigned to the TSC Manager.

Dispensation:
Functions related to fax transmission, document support and arranging for food/beverage services are administrative in nature and not related to any EP functions as identified in NUREG-0654 or INPO ACAD 15-010. As a result, the Logistics Support Leader position can be removed from the Emergency Plan in accordance with NUREG-0654, Revision 2 Table B-1, Note iii which states,

> *The minimum ERO staffing plan is that which is required to effectively implement the site specific emergency plan (i.e., the emergency plan cannot be effectively implemented without this staff). The emergency plan should only describe the minimum ERO staffing plan, while supporting implementing procedures can describe any*

Job Position: Logistics Support Leader	Site/Facility: Prairie Island, TSC

additional staff response desired by the licensee, as this additional staff is not critical to effective emergency plan implementation.

Document control and retrieval are administrative functions will continue to be performed by the Logistics Support leader, renamed Support Group Coordinator, as directed by FP-EP-EPIP-01, Attachment 21 and does not perform any EP functions as defined in NUREG-0654 or INPO ACAD 15-010.

Performance of dismissal of site personnel, document transmission, and NRC Site team interfacing can be completed by the TSC Security Coordinator, TSC ERO members and the TSC Manager respectively.

Performance of these activities by the Security Coordinator, ERO Member and the TSC Manager as listed previously continue to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Emergency Response Computer System (ERCS) Operator			**Site/Facility: Prairie Island, TSC**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Provide plant parameter trending and analysis utilizing ERCS.	No	No	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The ERCS Operator position was added to the PINGP emergency plan in Revision 54 as part of the ERO alignment established between the Xcel Energy NPPs.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
Although operation of the ERCS computer was a unique activity at the time this position was developed, access to plant and radiological information is now available via ERCS. ERCS data is maintained on the business LAN and is available on computers in the TSC. Information once requested of the ERCS Operator is now easily retrieved by the RAC, Dose Projection Specialist, Operations Coordinator, Engineering Coordinator and Engineering staff in the TSC.

Is the function/task necessary for implementation of the proposed Plan? Yes
Plant parameter trending for event response is a key activity for performance of the EP function, accident assessment. The proposed Plan maintains the Rad Assessment Coordinator (RAC), Dose Projection Specialist, Operations Coordinator, Engineering Coordinator and Engineering staff positions in the TSC who perform monitoring and trending of plant and radiological conditions.

Dispensation:
Performance of trending and plant monitoring is a fundamental task performed by RP, Operations and Engineering positions in the TSC.
Performance of trending and monitoring tasks by the RP, Operations and Engineering positions in the TSC continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Status Board Keepers		**Site/Facility: Prairie Island, TSC**	
Functions and Tasks	**EP Function**	**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1 / **INPO ACAD 15-010**	**Relief**	**Support**
1. Maintain a log in WebEOC	No / No	No	Yes
2. Support TSC Coordinator with work status board	No / No	No	Yes
3. Perform other duties as directed by the TSC Coordinator and ED	No / No	No	Yes

Historical Information:

Is this an SER Approved position? Yes

The Status Board Keeper was added to the PINGP Emergency Plan in Revision 54 as part of the ERO alignment established between the Xcel Energy NPPs.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:

Is the performance of the activity unique to the position? No

Status Board Keeper is an administrative task that can be completed by any position in the TSC. Documentation can also be completed via hard copy or using WebEOC.

Is the function/task necessary for implementation of the proposed Plan? Yes

In the proposed SEP, WebEOC log keeping is performed in accordance with FP-EP-EPIP-01, ERO Position Checklists. Additional administrative support can be provided by the Support Group Leader in accordance with FP-EP-EPIP-01, Attachment 21.

Dispensation:

Status Board Keeper is an administrative function and not related to any EP functions as identified in NUREG-0654 or INPO ACAD 15-010. As a result, the Record Log Keeper position can be removed from the Emergency Plan IAW NUREG-0654, Revision 2 Table B-1, Note iii which states,

> *The minimum ERO staffing plan is that which is required to effectively implement the site specific emergency plan (i.e., the emergency plan cannot be effectively implemented without this staff). The emergency plan should only describe the minimum ERO staffing plan, while supporting implementing procedures can describe any additional staff response desired by the licensee, as this additional staff is not critical to effective emergency plan implementation.*

Status Board Keeper as an administrative function will continue to be performed by the TSC ED or as assigned by the Support Group Leader as directed by FP-EP-EPIP-01, Attachment 21. As a result, the proposed SEP continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Record Log Keeper		**Site/Facility: Prairie Island, TSC**		
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Supports the ED in the TSC	No	No	No	Yes

Historical Information:

Is this an SER Approved position? Yes

The Record Log Keeper was added to the PINGP emergency plan in Revision 54 as part of the ERO alignment established between the Xcel Energy NPPs.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:

Is the performance of the activity unique to the position? No

Record Log Keeping is an administrative task that can be completed by any position in the TSC. Documentation can also be completed via hard copy or using WebEOC.

Is the function/task necessary for implementation of the proposed Plan? Yes

In the proposed SEP, WebEOC log keeping is performed in accordance with FP-EP-EPIP-01, ERO Position Checklists. Additional administrative support can be provided by the Support Group Leader in accordance with FP-EP-EPIP-01, Attachment 21.

Dispensation:

Record Log keeping is an administrative function and not related to any EP functions as identified in NUREG-0654 or INPO ACAD 15-010. As a result, the Record Log Keeper position can be removed from the Emergency Plan IAW NUREG-0654, Revision 2 Table B-1, Note iii which states,

> *The minimum ERO staffing plan is that which is required to effectively implement the site specific emergency plan (i.e., the emergency plan cannot be effectively implemented without this staff). The emergency plan should only describe the minimum ERO staffing plan, while supporting implementing procedures can describe any additional staff response desired by the licensee, as this additional staff is not critical to effective emergency plan implementation.*

Record Log keeping as an administrative function will continue to be performed by the TSC ED or as assigned by the Support Group Leader as directed by FP-EP-EPIP-01, Attachment 21. As a result, the proposed SEP continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Ops Advisor		**Site/Facility: Prairie Island, OSC**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Assist OSC Coordinator with operational aspects of work	No	No	No	Yes
2. Assist with emergency work requests	No	No	No	Yes
3. Provide info to the Status Board Keeper	No	No	No	Yes
4. Provide info and oversight to the status board keeper	No	No	No	Yes
5. Provide oversight for the Rad Status Communicator	No	Np	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The Ops Advisor was added to the PINGP in Revision 54 as part of the ERO alignment established between the Xcel Energy NPPs. The Ops Advisor provides supports the OSC Coordinator and provides oversight for the Rad Status Communicator and status board keepers.
Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? Yes
The current PINGP Plan uses the Ops Advisor as an oversight function to support facility operations.

Is the function/task necessary for implementation of the proposed Plan? Yes
In the proposed SEP the RP Coordinator is responsible for the communication function previously assigned to the Rad Status Communicator. With the removal of the OSC Chemistry position in the position in the OSC, the RP Coordinator is available to perform the communicating function.
Performance of this function is also supported by the use of WebEOC where information related to in-plant surveys and plant conditions is available to personnel in the TSC and EOF.
The proposed SEP also replaces the status board keeper administration function with log keeping capability using WebEOC.

Finally, the SEP maintains the development of work requests by the Maintenance Coordinators in the OSC. Additional support or response to questions from Operations is provided by the Operations Coordinator in the TSC.

Dispensation:
Oversight of communications, log keeping, and work management functions are administrative in nature and not related to an EP function as defined in NUREG-0654 or INPO ACAD 15-010. Performance of each of the directly performed functions have been assigned to Coordinator positions in the OSC, eliminating the need for additional oversight provided by the Ops Advisor position.
Performance of communications, log keeping and work management by the RP and Maintenance Coordinators in the OSC continue to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Status Board Keeper		**Site/Facility: Prairie Island, OSC**		
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Maintains event logs in the OSC on WebEOC	No	No	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The OSC Status Board Keeper was added to the PINGP emergency plan in Revision 54 as part of the ERO alignment established between the Xcel Energy NPPs. The OSC Status Board Keeper is responsible for log keeping/documentation as provided by the OSC Coordinator or other OSC members.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
This position is administrative/clerical in nature and does not perform any EP functions. WebEOC software is available to ERO personnel in all emergency response facilities (ERFs).

Is the function/task necessary for implementation of the proposed Plan? Yes
Maintenance Group Leaders, the RP and OSC Coordinators have access to WebEOC for the purpose of maintaining logs as well as tracking of in-plant team status and results of in-plant radiological surveys.

Dispensation:
The log keeping function is administrative in nature and not related to an EP function as defined in NUREG-0654 or INPO ACAD 15-010. As a result, the OSC Status Board Keeper position can be removed from the Emergency Plan in accordance with NUREG-0654, Revision 2 Table B-1, Note iii which states,

> *The minimum ERO staffing plan is that which is required to effectively implement the site specific emergency plan (i.e., the emergency plan cannot be effectively implemented without this staff). The emergency plan should only describe the minimum ERO staffing plan, while supporting implementing procedures can describe any additional staff response desired by the licensee, as this additional staff is not critical to effective emergency plan implementation.*

Log keeping as an administrative function will continue to be performed by the OSC Coordinator, Maintenance Group Leaders and the RP Coordinator as directed by FP-EP-EPIP-01, Attachments 25, 27, 28, 29 and 30.
As a result, the proposed SEP continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: RP Support Supervisor Assistant – State Liaison		**Site/Facility: Prairie Island, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Assist RPSS with communicating rad release and met conditions and trends to OROs.	Yes	Yes	No	Yes
2. Assist RPSS with communicating changes in key plant data to OROs	Yes	Yes	No	Yes
3. Assist RPSS with communications with ICP during security related events	Yes	Yes	No	Yes
4. Assist RPSS with ensuring Emergency Notification Follow up Messages are transmitted to OROs.	Yes	Yes	No	Yes
5. Assist RPSS with monitoring ORO implementation of protective actions.	No	No	No	No

Historical Information:
Is this an SER Approved position? Yes
The RPSS Assistant position was added to the Emergency plan in Revision 12, implemented in 1991, as part of the initial inclusion of the EOF Organizational chart that represented the ERO that has been used up until that time. In Revision 17, the position was renamed RPSS Assistant – State Liaison. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? See below
Line 1, 2 and 5 – No. Radiological assessment information is provided to the OROs regularly via the Emergency Notification Follow up Messages. The proposed SEP provides an Offsite Agency Liaison for coordinating the exchange of information between the EOF and the OROs. The RAC will also periodically update their ORO counterparts regarding radiological conditions.
Line 3 – Yes. The Alternative Facility position checklist directs assignment of an RP individual to the ICP by the RAC.
Line 4 – Yes. The Offsite Communicator is responsible for providing Emergency Notification Follow up Messages. The Security Coordinator is responsible for providing oversight for offsite communications.

Is the function/task necessary for implementation of the proposed Plan? See below
Lines 1, 2 and 5 – Yes.
Line 3 – Yes
Line 4 – Yes

Job Position: RP Support Supervisor Assistant – State Liaison	**Site/Facility: Prairie Island, EOF**
Dispensation: The proposed SEP changes the title of RPSS to RAC and the RPSS Assistant/Offsite Liaison position is eliminated. The proposed SEP provides a new position, Offsite Agency Liaison, to relay information between the OROs and the EOF. The EOF RAC will also periodically update the OROs regarding radiological conditions. The Offsite Communicator and the Security Coordinator will ensure regular follow-up messages are provided to the OROs. As a result, the proposed SEP continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.	

Job Position: RP Support Supervisor Assistant – Field Monitoring and Dose Assessment		**Site/Facility: Prairie Island, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Assist the RPSS in oversight of dose assessment activities.	Yes	Yes	No	Yes
2. Assist the RPSS in oversight of field monitoring activities.	Yes	Yes	No	Yes
3. Assist the RPSS in oversight of sample couriers and EOF Count Room activities.	Yes	Yes	No	Yes
4. Assist RPSS with PAR development	Yes	Yes	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The RPSS Assistant – Field Monitoring and Dose Assessment position title was added to the Emergency plan in Revision 17. The position had previously been titled Rad/Met Communicator. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? See below
Line 1 – No. The Dose Projection Specialist is responsible for performing dose assessments. The EOF RAC is responsible for providing oversight for dose assessment activities.
Line 2 – No. The Field Monitoring Team (FMT) Communicator is responsible for coordinating field monitoring activities. The EOF RAC is responsible for providing oversight for field monitoring activities,
Line 3 – No. The proposed SEP relocates the EOF to a location greater than 25 miles from the Xcel Energy NPPs and so will no longer maintain a count room at the new EOF. This also eliminates the need for sample couriers to transport samples to the EOF. Samples will continue to be counted at the onsite count room with the TSC RAC providing oversight for these activities.
Line 4 – No. The EOF RAC is responsible for developing PARs with input from the Dose Projection Specialist.
Is the function/task necessary for implementation of the proposed Plan? Yes
The tasks provided in Lines 1-4 are related to EP Functions and are necessary for implementation of the proposed Plan.

Dispensation:
The proposed SEP changes the title of RPSS to RAC and the RPSS Assistant/Field Monitoring and Dose Assessment position is eliminated. The EOF RAC will be responsible developing PARs with input from the Dose Projection Specialist. The FMT Communicator will coordinate field monitoring activities and the EOF RAC will provide oversight for these activities. The FMT Communicator and Dose projection specialist will report information directly to the EOF RAC. The proposed SEP relocates the EOF to a location greater than 25 miles from the Xcel Energy NPPs and as such a count room will not be maintained at the new EOF. This also eliminates the need for sample couriers to transport samples to the EOF. Samples will continue to be counted at the onsite count room with the TSC RAC providing oversight for these activities. The elimination of the EOF count room reduces the oversight burden for the EOF RAC. As a result, the proposed SEP continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Rad Status Board Keeper			**Site/Facility: Prairie Island, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Maintain Web EOC logs for radiological information	Yes	Yes	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The Rad Status Board Keeper position was added to the Emergency plan in Revision 12, implemented in 1991, as part of the initial inclusion of the EOF Organizational chart that represented the ERO that has been used up until that time in the facility. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
Radiological assessment data from the PPC is available to EOF ERO personnel via business LAN computers in the EOF. Emergency Notification follow up messaging is tracked using WebEOC software which is available to ERO personnel in all emergency response facilities (ERFs).

Is the function/task necessary for implementation of the proposed Plan? Yes
Monitoring and trending of radiological assessment data is associated with an EP Function and is necessary for implementation of the proposed Plan.

Dispensation:
Performance of monitoring and trending of radiological assessment information is performed using data from the PPC via business LAN computers in the EOF. Information from Emergency Notification Follow Up messages is available via WebEOC. As a result, the proposed SEP continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: EOF Coordinator Assistant		**Site/Facility: Prairie Island, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Assist the EOF Coordinator with EOF emergency ventilation system startup	No	No	No	No
2. Assist the EOF Coordinator with oversight of emergency communications activities	Yes	Yes	No	Yes
3. Assist the EOF Coordinator with oversight of administrative staff activities	No	No	No	No
4. Assist the EOF Coordinator with oversight of facility security	No	No	No	No
5. Assist the EOF Coordinator with oversight of facility staffing rotations	Yes	Yes	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The EOF Coordinator Assistant position was added to the Emergency plan in Revision 12, implemented in 1991, as part of the initial inclusion of the EOF Organizational chart that represented the ERO that has been used up until that time in the facility. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? See below
Line 1 – No. Assistance with the startup of the EOF emergency ventilation is no longer necessary since the EOF is located greater than 25 miles from the Xcel Energy NPPs.
Line 2 – No. The proposed EOF staff provides an offsite communicator for State and local communications reporting through the EOF Security Coordinator who provides the oversight for offsite communications. An ERF Communicator provides coordinated communications with the ERFs and provides relevant information directly to the EOF Manager.
Line 3 – No. Administrative activities include obtaining procedures and drawings, maintaining logs, etc. Documents can be obtained electronically by any ERO member from the electronic document management system available on the business LAN computers. Logs are maintained in WebEOC by the respective ERO positions.
Line 4 – No. The EOF Security Coordinator is responsible for EOF Security
Line 5 – No. The EOF Manager is responsible for EOF staffing rotations.
Is the function/task necessary for implementation of the proposed Plan? Yes
Tasks described in Line 2 for emergency communications and Line 5 for ensuring 24/7 EOF staffing are associated with an EP function and are necessary for implementing the Plan.

Dispensation:
The proposed SEP changes the EOF Coordinator title to EOF Manager and eliminates the EOF Coordinator Assistant position. The EOF Manager has overall responsibility for management of the EOF activities. In the proposed SEP the Security Coordinator is responsible for oversight of offsite

Job Position: EOF Coordinator Assistant	**Site/Facility: Prairie Island, EOF**

communications which are performed by the Offsite Communicator. The Security Coordinator is also responsible for EOF Security. Individual administrative tasks such as obtaining procedures and log keeping are performed by the individual ERO members via electronic means using business LAN computers further reducing the oversight burden of the EOF Manager. The document control/administrative functions related to document retrieval and storage are administrative functions and not related to any EP functions as identified in NUREG-0654 or INPO ACAD 15-010. As a result, these tasks can be removed from the Emergency Plan in accordance with NUREG-0654, Revision 2 Table B-1, Note iii which states,

> *The minimum ERO staffing plan is that which is required to effectively implement the site specific emergency plan (i.e., the emergency plan cannot be effectively implemented without this staff). The emergency plan should only describe the minimum ERO staffing plan, while supporting implementing procedures can describe any additional staff response desired by the licensee, as this additional staff is not critical to effective emergency plan implementation*.

Direction and coordination of EOF activities per the proposed SEP will be performed by the EOF Manager and as such continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Administrative Support Lead		**Site/Facility: Prairie Island, EOF**	
Functions and Tasks	**EP Function**	**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1 / **INPO ACAD 15-010**	**Relief**	**Support**
1. Provide direction and coordination of Administrative Staff for:	No / No	No	Yes
2. Provide supplies to responders	No / No	No	Yes
3. Telephone response	No / No	No	Yes
4. Arrange for meals	No / No	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The Administrative Support Lead position was added to the Emergency Plan in Revision 17. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
The Administrative Support Lead provides direction and coordination of the Administrative Support Staff. The tasks performed by the Administrative Support Staff such as obtaining supplies for ERO responders, telephone response and arranging for meals are administrative in nature and are not related to an EP function.
Is the function/task necessary for implementation of the proposed Plan? Yes

Dispensation:
The Administrative Support Lead functions related to provision of ERO support are administrative functions and not related to any EP functions as identified in NUREG-0654 or INPO ACAD 15-010. As a result, the Support Group Leader position can be removed from the Emergency Plan in accordance with NUREG-0654, Revision 2 Table B-1, Note iii which states,

> *The minimum ERO staffing plan is that which is required to effectively implement the site specific emergency plan (i.e., the emergency plan cannot be effectively implemented without this staff). The emergency plan should only describe the minimum ERO staffing plan, while supporting implementing procedures can describe any additional staff response desired by the licensee, as this additional staff is not critical to effective emergency plan implementation.*

Document control and retrieval are administrative functions will continue to be performed by the Support Group Coordinator as directed by FP-EP-EPIP-01, Attachment 21 and does not perform any EP functions as defined in NUREG-0654 or INPO ACAD 15-010.

Performance of Assembly/Accountability, Document oversight, staffing verification and PA Announcements by the TSC Manager, Security Coordinator and Shift Manager continue to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Administrative Support Staff		**Site/Facility: Prairie Island, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Obtain documents	No	No	No	Yes
2. Obtain office supplies as needed	No	No	No	Yes
3. Make photocopies and transmit faxes as needed	No	No	No	Yes
4. Maintain facility flipchart	No	No	No	Yes
5. Answering phones	No	No	No	Yes
6. Routing of messages	No	No	No	Yes
7. Ordering meals	No	No	No	Yes

Historical Information:

Is this an SER Approved position? Yes

The Administrative Support Staff positions were added to the Emergency Plan in Revision 12, implemented in 1991, as part of the initial inclusion of the EOF Organizational chart that represented the ERO that has been used up until that time in the facility. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:

Is the performance of the activity unique to the position? No

Line 1 – No. Procedures and drawings are maintained electronically as part of the utilities electronic document management system and are readily accessible to ERO members in the EOF.

Line 2 – No. Adequate supplies are maintained in the ERFs to support facility operations

Lines 3, 5, and 6 – No. The telephone operation, making photocopies, faxing, etc. are administrative in nature and are performed by individual ERO positions as needed

Line 6 – No. ordering meals is administrative in nature and be performed by any individual when needed.

Is the function/task necessary for implementation of the proposed Plan? Yes

The Administrative Support Staff performs administrative functions that are not associated with an EP function as defined in NUREG-0654 or INPO ACAD 15-010.

Dispensation:

The tasks performed by the Administrative Support Staff such as obtaining documents telephone operation, making photocopies, faxing, etc. are administrative and are performed by individual ERO positions as needed and are not related to any EP functions as identified in NUREG-0654 or INPO ACAD 15-010. As a result, the Administrative Support Staff can be removed from the Emergency Plan in accordance with NUREG-0654, Revision 2 Table B-1, Note iii which states,

> *The minimum ERO staffing plan is that which is required to effectively implement the site specific emergency plan (i.e., the emergency plan cannot be effectively implemented without this staff). The emergency plan should only describe the minimum ERO staffing plan, while supporting implementing procedures can describe any additional staff*

Job Position: Administrative Support Staff	**Site/Facility: Prairie Island, EOF**
response desired by the licensee, as this additional staff is not critical to effective emergency plan implementation. Document control and retrieval are administrative functions will continue to be performed by the Support Group Coordinator as directed by FP-EP-EPIP-01, Attachment 21 and does not perform any EP functions as defined in NUREG-0654 or INPO ACAD 15-010. As a result, the proposed SEP continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.	

Job Position: Status Board Keeper		**Site/Facility: Prairie Island, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Support EOF Coordinator and EM in tracking work status	No	No	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The Status Board Keeper position was added to the Emergency Plan in Revision 23 as part of the company transition from Northern States Power to Xcel Energy. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
Access to work status information is maintained via WebEOC which is readily available on computers in the EOF and is updated by ERO personnel in the TSC and OSC. In addition, the ERF Communicator position obtains information regarding event response activities from the control room, TSC and OSC and provides this information directly to the TSC Manager and EM.

Is the function/task necessary for implementation of the proposed Plan? Yes
Tracking the status of emergency response work activities is associated with an EP Function and is necessary for implementing the Plan. Under the proposed SEP, the Technical Support Group activities are maintained in the TSC and do not transfer to the EOF upon activation of that facility. This change allows the TSC to focus on plant response allowing the EOF to better focus on offsite agency interface and public protection.

Dispensation:
Knowledge of the status of emergency response work activities is necessary for the EM to provide command and control of the overall event response. Access to work status information is maintained via WebEOC which is readily available on computers in the EOF and is updated by ERO personnel in the TSC and OSC. In addition, the ERF Communicator position obtains information regarding event response activities from the control room, TSC and OSC and provides this information directly to the TSC Manager and EM. As a result, the proposed SEP continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

The TSC Operations Coordinator and engineering staff maintain the capability for trending of plant parameters and developing event response and mitigative strategies. Performance of technical trending and monitoring tasks by the Operations Coordinator, Engineering Coordinator and Engineering staff in the TSC continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Trending Team Leader		**Site/Facility: Prairie Island, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Access plant data via the ERCS.	No	No	No	Yes
2. Trending display lists	No	No	No	Yes

Historical Information:

Is this an SER Approved position? Yes

The Trending Team Leader position was added to the Emergency Plan in Revision 23 as part of the company transition from Northern States Power to Xcel Energy. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:

Is the performance of the activity unique to the position? No

Although operation of the ERCS computer display was a unique activity at the time this position was developed, access to plant and radiological information is now available via ERCS. ERCS data is readily available on business LAN computers in the EOF. Information once requested of the ERCS Operator position by the Technical Support Group is now easily retrieved by EOF responders and can be trended based on position specific needs.

Is the function/task necessary for implementation of the proposed Plan? Yes

Under the proposed SEP, trending of plant parameters is primarily performed in the TSC, however, the capability continues to exist I the EOF using ERCS. Transitioning this function to the TSC allows that facility to focus on plant response and allows the EOF to better focus on offsite agency interface and public protection.

Dispensation:

The TSC Operations Coordinator and engineering staff maintain the capability for trending of plant parameters and developing event response and mitigative strategies. Performance of technical trending and monitoring tasks by the Operations Coordinator, Engineering Coordinator and Engineering staff in the TSC continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Emergency Response Computer System Operator		**Site/Facility: Prairie Island, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Access plant data via the ERCS.	No	No	No	Yes
2. Trending display lists	No	No	No	Yes

Historical Information:

Is this an SER Approved position? Yes

The Emergency Response Computer System (ERCS) Operator position was added to the Emergency plan in Revision 23 as part of the company transition from Northern States Power to Xcel Energy. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:

Is the performance of the activity unique to the position? No

Although operation of the ERCS computer display was a unique activity at the time this position was developed, access to plant and radiological information is now available via ERCS. ERCS data is maintained on the business LAN and is available on computers in the TSC. Information once requested of the ERCS Operator position by the Technical Support Group is now easily retrieved by EOF responders and can be trended based on position specific needs.

Is the function/task necessary for implementation of the proposed Plan? Yes

Under the proposed SEP, the Technical Support Group activities are maintained in the TSC in support of the classification function and do not transfer to the EOF upon activation of that facility. This change allows the TSC to focus on plant response and allows the EOF to better focus on offsite agency interface and public protection.

Dispensation:

The TSC Operations Coordinator and engineering staff maintain the capability for trending of plant parameters and developing event response and mitigative strategies. Performance of technical trending and monitoring tasks by the Operations Coordinator, Engineering Coordinator and Engineering staff in the TSC continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Event Status Board Keeper		**Site/Facility: Prairie Island, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**	
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Support (provide data) 3-way communicators IAW PINGP 653	No	No	No	Yes
2. Track status of RCS, Containment, NSSS, Cooling, Electrical and Met Data	No	No	No	Yes

Historical Information:

Is this an SER Approved position? Yes

The Event Status Board Keeper position was added to the Emergency plan in Revision 17. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:

Is the performance of the activity unique to the position? No

Access to plant and met information, if needed, is now available via E RCS. ERCS data is maintained on the business LAN and is available on computers in the TSC. The Event Status Board Keeper position initially supported the ENS Communicator in the EOF by tracking plant conditions throughout the event. With the improvements in ERCS availability, EOF personnel are now able to trend plant data based on their specific needs.

Is the function/task necessary for implementation of the proposed Plan? Yes

Under the proposed SEP, technical support/engineering analysis are maintained in the TSC and do not transfer to the EOF upon activation of that facility. Similarly, ENS Communications remain the responsibility of the TSC throughout the event and do not transfer to the EOF. This change allows the TSC to focus on plant response and allows the EOF to better focus on offsite agency interface and public protection.

Dispensation:

The TSC engineering staff and ENS Communicator positions maintain the capability for trending of plant parameters for communications via ENS as well as developing event response and mitigative strategies. Tracking and trending of plant conditions by the TSC engineering staff and ENS Communicator continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.

Job Position: Narrative Log Keeper		**Site/Facility: Prairie Island, EOF**	
Functions and Tasks	**EP Function**		**On-Shift Interface per NUREG-0654 Table B-1, Note i**
	NUREG-0654 Table B-1	**INPO ACAD 15-010**	**Relief**	**Support**
1. Document event information as provided by the Emergency Manager	No	No	No	Yes
2. Maintain hardcopy records if needed	No	No	No	Yes

Historical Information:
Is this an SER Approved position? Yes
The Narrative Log Keeper position was added to the Emergency plan in Revision 12, implemented in 1991, as part of the initial inclusion of the EOF Organizational chart that represented the ERO that has been used up until that time in the facility. This position was included in Revision 54 of the PINGP Emergency Plan which was SE approved.

Was the position added because of a Finding/violation/performance deficiency or commitment? No

Evaluation:
Is the performance of the activity unique to the position? No
Data entry is an administrative task that can be completed by any position in the EOF. Documentation can also be completed via hard copy or using WebEOC.

Is the function/task necessary for implementation of the proposed Plan? Yes
In the proposed SEP, WebEOC log keeping is performed in accordance with FP-EP-EPIP-01, ERO Position Checklists. Additional administrative support can be provided by the Support Group Leader in accordance with FP-EP-EPIP-01, Attachment 21.

Dispensation:
Log keeping is an administrative function and not related to any EP functions as identified in NUREG-0654 or INPO ACAD 15-010. As a result, the Narrative Log Keeper position can be removed from the Emergency Plan in accordance with NUREG-0654, Revision 2 Table B-1, Note iii which states,

> *The minimum ERO staffing plan is that which is required to effectively implement the site specific emergency plan (i.e., the emergency plan cannot be effectively implemented without this staff). The emergency plan should only describe the minimum ERO staffing plan, while supporting implementing procedures can describe any additional staff response desired by the licensee, as this additional staff is not critical to effective emergency plan implementation.*

Log keeping as an administrative function will continue to be performed by the EOF or as assigned by the Support Group Coordinator as directed by FP-EP-EPIP-01, Attachment 21. As a result, the proposed SEP continues to meet the requirements of 10 CFR 50.47(b)(2) and applicable sections of Appendix E to 10 CFR Part 50.