



POLICY ISSUE

(Notation Vote)

November 29, 2022

SECY-22-0106

FOR: The Commissioners

FROM: Daniel H. Dorman
Executive Director for Operations

SUBJECT: XCEL ENERGY REQUEST FOR EMERGENCY OPERATIONS
FACILITY CONSOLIDATION AND RELOCATION

PURPOSE:

The purpose of this paper is to request Commission approval of the license amendment request submitted by the Northern States Power Company (NSPM), a Minnesota (MN) corporation, doing business as Xcel Energy to replace the existing Monticello Nuclear Generating Plant (MNGP) and Prairie Island Nuclear Generating Plant (PINGP) emergency operation facilities (EOFs), and their common backup EOF with a consolidated EOF centrally located in the Xcel Energy headquarters, located in Minneapolis, MN. Prior Commission approval is required because the distance between the proposed EOF and the MNGP technical support center (TSC) is approximately 37 miles, and the distance to the PINGP TSC is approximately 40 miles.

This paper does not address any new commitments or resource implications.

BACKGROUND:

An EOF provides a facility from which the licensee can manage the overall licensee emergency response during an event, including coordinating radiological and environmental assessments, determining protective actions, communicating, and coordinating with Federal, State, and local agencies. This facility complements other licensee emergency response facilities, such as the

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TSC, which is located onsite at each respective site, and from which the licensee staff provides plant management and technical support to plant operations personnel during emergency conditions.

A list of existing EOFs (primary and backup), located more than 25 miles from their respective nuclear power reactor sites, is provided in enclosure 1, "Commission-Approved Emergency Operations Facilities Located More than 25 Miles from Respective Nuclear Power Reactor Site(s)."

DISCUSSION:

Request to Relocate and Consolidate the Xcel Energy EOF

If a licensee desires to locate an EOF more than 25 miles from a nuclear power reactor site, prior Commission approval is required under paragraph IV.E.8.b of appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to Title 10 of the *Code of Federal Regulations* (10 CFR) part 50, "Domestic Licensing of Production and Utilization Facilities."

Xcel Energy proposes replacing the existing MNGP and PINGP EOFs (located 1.0 and 0.5 miles, respectively from the MNGP and PINGP sites), and their common backup EOF (located 45 miles and 55 miles, respectively, from those sites) with a consolidated EOF centrally located in the Xcel Energy headquarters. The distance from the proposed EOF to the MNGP TSC is approximately 37 miles, and the distance to the PINGP TSC is approximately 40 miles. The current MNGP and PINGP emergency plans consist of plant-specific emergency plans and a corporate offsite emergency plan. Xcel Energy also proposes a standardized emergency plan (SEP) where information that is common to the MNGP emergency plan, the PINGP emergency plan, and the corporate offsite emergency plan will be consolidated into the SEP, and information that is unique to MNGP and PINGP will be contained in site specific annexes.

Staff Consideration

In its evaluation of Xcel Energy's request to relocate the existing MNGP and PINGP near-site EOFs, and their common backup EOF with a consolidated EOF centrally located in the Xcel Energy headquarters, the staff considered all relevant requirements and guidance. A detailed discussion of the requirements and guidance, as well as the staff's evaluation, is provided in Enclosure 2, "Evaluation of Xcel Energy Request to Consolidate the Near-Site Emergency Operations Facilities for Monticello Nuclear Generating Plant and Prairie Island Nuclear Generating Plant."

Requirements and Guidance

The regulations for evaluating a request to consolidate an EOF are contained in 10 CFR 50.47(b) and appendix E to 10 CFR Part 50. The requirements for an EOF include the following capabilities, as specified in 10 CFR Part 50, Appendix E, Section 8.c:

- (1) The capability for obtaining and displaying plant data and radiological information for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves;

- (2) The capability to analyze plant technical information and provide technical briefings on event conditions and prognosis to licensee and offsite response organizations for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves; and
- (3) The capability to support response to events occurring simultaneously at more than one nuclear power reactor site if the EOF serves more than one site.

In addition, when an EOF is located more than 25 miles from the reactor site, 10 CFR Part 50, Appendix E, Section E.8.b. requires that provisions be made for locating the U.S. Nuclear Regulatory Commission (NRC) and offsite responders closer to the nuclear power reactor site so that they can interact face-to-face with emergency response personnel entering and leaving the nuclear power reactor site. These provisions at the near-site location must include the following:

- (1) Space for members of an NRC site team and Federal, State, and local responders;
- (2) Additional space for conducting briefings with emergency response personnel;
- (3) Communication with other licensee and offsite emergency response facilities;
- (4) Access to plant data and radiological information; and
- (5) Access to copying equipment and office supplies.

NUREG-0696, "Functional Criteria for Emergency Response Facilities," issued in 1981 (Agencywide Documents Access and Management System Accession No. ML051390358), provides the criteria that the staff evaluates during its review, which ensures that the review considers the following aspects of the EOF:

- functions;
- location, structure, and habitability;
- staffing and training;
- size;
- radiological monitoring;
- communications;
- instrumentation, data system equipment, and power supplies;
- technical data and data system; and
- records availability and management.

Staff Evaluation

The staff's evaluation analyzed whether the licensee complied with the regulations and followed the applicable guidance to demonstrate the ability of the proposed facility to perform the key functions of the EOF upon an emergency declaration requiring EOF activation for at least two nuclear power reactor sites. The staff evaluated the proposed EOF's capability to fulfill its required emergency response functions for MNGP and PINGP; the facility's location and size; the anticipated staffing and training of licensee emergency response personnel at the facility; the transfer of responsibilities from the EOF to the TSC, thereby not requiring site resources to travel to the common Xcel Energy EOF; the facility's communications capabilities and data systems; the facility's capacity for accommodating a multi-site event; and the facility's ability to accommodate personnel from the NRC and/or State and local response organizations. Further, the staff considered the adequacy of the provisions made for locating NRC and offsite

responders closer to the nuclear power reactor site so that they can interact face-to-face with emergency response personnel entering and leaving the nuclear power reactor site. In addition, the staff's evaluation considered concurrence by affected State and local entities in support of the proposed consolidation, and the Federal Emergency Management Agency's review of impacts of the proposed consolidation on existing State and local radiological emergency response plans. The staff's evaluation included a review of proposed emergency plan changes and supporting documents.

CONCLUSION:

Based on its evaluation, the staff concludes that the proposed Xcel Energy EOF relocation, and consolidation into an EOF centrally located in the Xcel Energy headquarters would fulfill necessary emergency response functions and meet applicable regulations in 10 CFR 50.47 and Appendix E of 10 CFR Part 50. Given the technological capabilities of the facility, its capacity to address multi-site events, and an Emergency Response Organization comprised of experienced staff from the Xcel Energy corporate offices, the NRC staff has determined that the Xcel Energy consolidated EOF will continue to effectively support Xcel Energy's emergency response at the sites that the facility serves. Moreover, no change is being made to Xcel Energy's near-site facilities for locating NRC and offsite responders closer to the nuclear power reactor site so that they can interact face-to-face with emergency response personnel entering and leaving the reactor site, and those facilities remain acceptable. As such, the NRC would have reasonable assurance that adequate protective measures can and will be implemented in the event of a radiological emergency at MNGP or PINGP.

RECOMMENDATIONS:

The staff recommends that the Commission approve the proposed relocation of the MNGP and PINGP EOFs and their common backup emergency EOF, and their consolidation into the EOF centrally located in the Xcel Energy headquarters.

COORDINATION:

The Office of the General Counsel reviewed this package and has no legal objection.

Daniel H. Dorman
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Enclosures:

1. Commission-Approved EOF
Located More than 25 Miles from
Respective Nuclear Power
Reactor Site
2. Evaluation of Xcel Energy Request to Relocate
and Consolidate the Emergency Operations
Facilities for MNGP and PINGP

SUBJECT: XCEL ENERGY REQUEST FOR EMERGENCY OPERATIONS FACILITY
 CONSOLIDATION AND RELOCATION DATED: November 29, 2022

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