



KEVIN M. ELLIS
General Manager

**Nuclear Regulatory Affairs, Policy &
Emergency Preparedness**
13225 Hagers Ferry Rd., MG011E
Huntersville, NC 28078
843-951-1329
Kevin.Ellis@duke-energy.com

Serial: RA-23-0281
November 1, 2023

10 CFR 50.54(q)

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

Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Docket Nos. 50-325, 50-324 / Renewed License NOS. DPR-71 and DPR-62

Catawba Nuclear Station, Unit Nos. 1 and 2
Docket Nos. 50-413, 50-414 / Renewed License Nos. NPF-35 and NPF-52

H. B. Robinson Steam Electric Plant, Unit No. 2
Docket No. 50-261 / Renewed License No. DPR-23

McGuire Nuclear Station, Unit Nos. 1 and 2
Docket Nos. 50-369, 50-370 / Renewed License Nos. NPF-9 and NPF-17

Oconee Nuclear Station, Unit Nos. 1, 2 and 3
Docket Nos. 50-269, 50-270, And 50-287 / Renewed License Nos. DPR-38, DPR-47, and DPR-55

Shearon Harris Nuclear Power Plant, Unit 1
Docket No. 50-400 / Renewed License No. NPF-63

SUBJECT: Procedure EP-ALL-EPLAN, "DUKE ENERGY COMMON EMERGENCY PLAN", Revision 5, Summary of Changes

Ladies and Gentlemen:

In accordance with 10 CFR 50.54(q), Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC (collectively referred to as Duke Energy), are submitting a revision summary for Procedure EP-ALL-EPLAN, "DUKE ENERGY COMMON EMERGENCY PLAN", Revision 5.

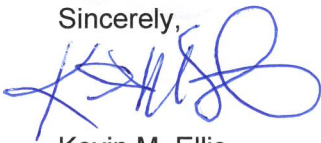
Procedure EP-ALL-EPLAN, "DUKE ENERGY COMMON EMERGENCY PLAN", provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to nuclear power plants operated by Duke Energy, and plant employees. The Duke Energy Common Emergency Plan outlines actions taken to prepare for and respond to a declared emergency. Planning efforts common to all Duke Energy nuclear sites are encompassed within the Duke Energy Common Emergency Plan. Changes in Revision 5 clarify requirements for siren testing after maintenance.

The changes described above have been evaluated in accordance with 10 CFR 50.54(q) and have been determined to not result in a reduction in the effectiveness of the Emergency Plan. The Duke Energy Common Emergency Plan continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. In accordance with 10 CFR 50.54(q)(5), Attachment 1 includes a summary of analyses associated with Procedure EP-ALL-EPLAN, "DUKE ENERGY COMMON EMERGENCY PLAN", Revision 5.

This document contains no new regulatory commitments.

Should you have any questions concerning this letter, or require additional information, please contact Ryan Treadway, Fleet Licensing Director, at (980) 373-5873.

Sincerely,



Kevin M. Ellis
General Manager – Nuclear Regulatory Affairs, Policy & Emergency Preparedness

Attachment 1: Procedure EP-ALL-EPLAN, "DUKE ENERGY COMMON EMERGENCY PLAN",
Revision 5, 10 CFR 50.54(q)

cc: L. Dudes, Regional Administrator USNRC Region II
G. Smith, USNRC Senior Resident Inspector – BNP
D. Rivard, USNRC Senior Resident Inspector – CNS
P. Boguszewski, USNRC Senior Resident Inspector – HNP
C. Safouri, USNRC Senior Resident Inspector – MNS
J. Nadel, USNRC Senior Resident Inspector – ONS
J. Zeiler, USNRC Senior Resident Inspector – RNP
L. Haeg, NRR Project Manager – BNP
S. A. Williams, NRR Project Manager – CNS and ONS
M. Mahoney, NRR Project Manager – HNP
J. Klos, NRR Project Manager – MNS
L. Haeg, NRR Project Manager – RNP

**Attachment 1: Procedure EP-ALL-EPLAN, "DUKE ENERGY COMMON EMERGENCY
PLAN", Revision 5, 10 CFR 50.54(q)**

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 9

ATTACHMENT 1

Page 1 of 12

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

Section I: 10 CFR 50.54(q) Review Number: (EREG #):				2487477	
Applicable Sites and Applicability Determination # (5AD)					
■ BNP	2487470	■ CNS	2487472	■ HNP	2487473
■ MNS	2487474	■ ONS	2487475	■ RNP	2487476
Document #, EC #, or N/A	Revision # or N/A	Document or Activity Title			
EP-ALL-EPLAN	5	DUKE ENERGY COMMON EMERGENCY PLAN			

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

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

Activity/Changes:

EP-ALL-EPLAN, Duke Energy Common Emergency Plan, is the Emergency Plan utilized by the Duke Energy Nuclear Fleet. The Common Emergency Plan is being revised to address siren testing after maintenance.

Change #	Section or Step #	Change From	Change to
1	Throughout	Revision 4 revision number, effective dates, revision summary	Revision 5 revision number, effective dates, revision summary
2	Section F - F.3 7th bullet, 2nd sub bullet	Growl Tests are performed quarterly and after preventative and on-demand maintenance is performed.	Growl Tests are performed quarterly. This test also fulfills the requirements for the Silent Test.
3	Section F - F.3 Last Paragraph	Added to document	Post maintenance (preventive and corrective) testing is conducted to ensure the siren is fully functional.

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 9

ATTACHMENT 1
Page 2 of 12

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

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

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

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

Licensing Basis:

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

Current Emergency Plans:

- EP-ALL-EPLAN, Duke Energy Common Emergency Plan, Rev 4 Section F
- EP-BNP-EPLAN-ANNEX, Duke Energy Brunswick Emergency Plan Annex, Rev 2
- EP-CNS-EPLAN-ANNEX, Duke Energy Catawba Emergency Plan Annex, Rev 2
- EP-HNP-EPLAN-ANNEX, Duke Energy Harris Emergency Plan Annex, Rev 1
- EP-MNS-EPLAN-ANNEX, Duke Energy McGuire Emergency Plan Annex, Rev 2
- EP-ONS-EPLAN-ANNEX, Duke Energy Oconee Emergency Plan Annex, Rev 1
- EP-RNP-EPLAN-ANNEX, Duke Energy Robinson Emergency Plan Annex, Rev 2

The differences in the approved and the current revision of the Emergency Plans have been reviewed, and they have been determined to meet the regulatory requirements during the course of revisions.

Duke Energy Site Design Reports:

- EP-BNP-ANS, Brunswick Emergency Plan Alert and Notification System Design Report
- EP-CNS-ANS, Catawba Emergency Plan Alert and Notification System Design Report
- EP-HNP-ANS, Harris Emergency Plan Alert and Notification System Design Report
- EP-MNS-ANS, McGuire Emergency Plan Alert and Notification Design Report
- EP-ONS-ANS, Oconee Emergency Plan Alert and Notification System Design Report
- EP-RNP-ANS, Robinson Emergency Plan Alert and Notification System Design Report

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 9

ATTACHMENT 1
Page 3 of 12

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

Section IV: Ability to Maintain the Emergency Plan.
Answer the following questions related to impact on the ability to maintain the Emergency Plan. Continue to Section V.

1. Do any of the elements of the proposed activity change information or intent contained in the Emergency Plan?	Yes <input type="checkbox"/> No <input type="checkbox"/>
2. Do any elements of the proposed activity change the process or capability for alerting or notifying the public as described in the FEMA-approved Alert and Notification System Design Report?	Yes <input type="checkbox"/> No <input type="checkbox"/>
3. Do any elements of the proposed activity change the Evacuation Time Estimate results?	Yes <input type="checkbox"/> No <input type="checkbox"/>
4. Do any elements of the proposed activity change the On-Shift Staffing Analysis results?	Yes <input type="checkbox"/> No <input type="checkbox"/>
5. Does the Proposed activity require a change to the Emergency Plan Programmatic Description?	Yes <input type="checkbox"/> No <input type="checkbox"/>

If Question 5 was answered yes, and the document being reviewed is NOT the Emergency Plan, then exit this review until the Emergency Plan change is complete or the proposed change is modified to not change the Emergency Plan Programmatic Description.

Section IV conclusion:

- If questions 1-5 in **Section IV** marked NO, then complete **Section V**.
- If any question 1-5 of **Section IV** marked yes, then continue at **Section VI**.

Section V: Maintaining the Emergency Plan Conclusion.

The questions in **Section IV** do not represent the total of all conditions that may cause a change to or impact the ability to maintain the emergency plan. Originator and reviewer signatures in **Section XIV** document that a review of all elements of the proposed change have been considered for their impact on the ability to maintain the emergency plan and their potential to change the emergency plan.

1. Provide a brief conclusion below that describes how the conditions, as described in the emergency plan, are maintained with this activity.
 2. Select the box below when the review completes all actions for all elements of the activity and no 10CFR50.54 screening or evaluation is required for any element. Continue to **Section XIV**.
- I have completed a review of this activity in accordance with 10CFR50.54(q)(2) and determined that the effectiveness of the emergency plan is maintained. This activity does not make any changes to the emergency plan. No further actions are required to screen or evaluate this activity in accordance with 10CFR50.54(q)(3).

Conclusion:

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 9

ATTACHMENT 1
Page 4 of 12

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

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

Bounding source document and list of bounded changes:

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

Justification:

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

Proposed change 1, updates the revision number, effective dates, and revision summary. These changes are a result of Duke Energy's procedure formatting and require updating during the revision process. This proposed change does not change intent of the Emergency Plan therefore, this change is considered editorial.

10 CFR 50.54(q) Review Form**Section VIII: Emergency Planning Element and Function Screen***(Utilize Reg Guide 1.219 and Attachment 1, Additional Regulatory Guidance References for additional assistance)***Does any of Proposed Activities/Changes Identified in Section I impact any of the following, including program elements from NUREG-0654/FEMA REP-1 Section II? If yes check appropriate box.**

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

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 9

Attachment 1
Page 6 of 12

10 CFR 50.54(q) Review Form

10a	A range of public PARs is available for implementation during emergencies.	<input type="checkbox"/>
10b	Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.	<input type="checkbox"/>
10c	A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.	<input type="checkbox"/>
10d	KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public.	<input type="checkbox"/>
11	10 CFR 50.47(b) (11) Radiological Exposure Control	
11a	The resources for controlling radiological exposures for emergency workers are established.	<input type="checkbox"/>
12	10 CFR 50.47(b) (12) Medical and Public Health Support	
12a	Arrangements are made for medical services for contaminated, injured individuals.	<input type="checkbox"/>
13	10 CFR 50.47(b) (13) Recovery Planning and Post-Accident Operations	
13a	Plans for recovery and reentry are developed.	<input type="checkbox"/>
14	10 CFR 50.47(b) (14) Drills and Exercises	
14a	A drill and exercise program (including radiological, medical, health physics and other program areas) is established.	<input type="checkbox"/>
14b	Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills are assessed via a formal critique process in order to identify weaknesses.	<input type="checkbox"/>
14c	Identified weaknesses are corrected.	<input type="checkbox"/>
15	10 CFR 50.47(b) (15) Emergency Response Training	
15a	Training is provided to emergency responders.	<input type="checkbox"/>
16	10 CFR 50.47(b) (16) Emergency Plan Maintenance	
16a	Responsibility for emergency plan development and review is established.	<input type="checkbox"/>
16b	Planners responsible for emergency plan development and maintenance are properly trained.	<input type="checkbox"/>

Section VIII: Conclusion

- If any **Section VIII** criteria are checked, document the basis for conclusion below for any changes that are more than editorial, however not impacted by any of the identified criteria in Section VIII and continue the 50.54(q) Review in **Section IX**.
- If no **Section VIII** criteria are checked, 10CFR50.54(q)(3) Evaluation is NOT required. Document justification below for any changes that are more than editorial and continue to **Section XIV**.

Justification for changes that are more than editorial, however, not impacted by any of the identified criteria in Section VIII:

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 9

Attachment 1
Page 7 of 12

10 CFR 50.54(q) Review Form

Section IX: Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change
Copy each emergency planning standard, function and program element affected by the proposed change that was identified as applicable in Section VIII . Continue to Section X .

List affected Emergency Planning Standards, Functions, and Program Elements:

10CFR50.47(b)(5) - 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 Emergency Planning Zone have been established.

10CFR50 Appendix E.IV.D. Notification Procedures (in part):

1. Administrative and physical means for notifying local, State, and Federal officials and agencies and agreements reached with these officials and agencies for the prompt notification of the public and for public evacuation or other protective measures, should they become necessary, shall be described. This description shall include identification of the appropriate officials, by title and agency, of the State and local government agencies within the EPZs.

3. A licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency. The licensee shall demonstrate that the appropriate governmental authorities have the capability to make a public alerting and notification decision promptly on being informed by the licensee of an emergency condition. Prior to initial operation greater than 5 percent of rated thermal power of the first reactor at a site, each nuclear power reactor licensee shall demonstrate that administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway EPZ. The design objective of the prompt public alert and notification system shall be to have the capability to essentially complete the initial alerting and initiate notification of the public within the plume exposure pathway EPZ within about 15 minutes. The use of this alerting and notification capability will range from immediate alerting and notification of the public (within 15 minutes of the time that State and local officials are notified that a situation exists requiring urgent action) to the more likely events where there is substantial time available for the appropriate governmental authorities to make a judgment whether or not to activate the public alert and notification system. The alerting and notification capability shall additionally include administrative and physical means for a backup method of public alerting and notification capable of being used in the event the primary method of alerting and notification is unavailable during an emergency to alert or notify all or portions of the plume exposure pathway EPZ population. The backup method shall have the capability to alert and notify the public within the plume exposure pathway EPZ but does not need to meet the 15-minute design objective for the primary prompt public alert and notification system. When there is a decision to activate the alert and notification system, the appropriate governmental authorities will determine whether to activate the entire alert and notification system simultaneously or in a graduated or staged manner. The responsibility for activating such a public alert and notification system shall remain with the appropriate governmental authorities.

The associated EP Function is Function 5c:

“The public ANS meets the design requirements of FEMA-REP-10, Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants or complies with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter.”

10 CFR 50.47(b)(6) - Emergency Communications:

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

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 9

10 CFR 50.54(q) Review Form

10CFR50 Appendix E.IV:

There is no specific appendix E reference for Siren testing.

The associated EP Function is Function 6a:

"Systems are established for prompt communication among principal emergency response organizations."

The applicable program element is 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.

Section X: Describe How the Proposed Change Complies with Relevant Emergency Preparedness Regulation(s) and Previous Commitment(s) Made to the NRC
If the emergency plan, modified as proposed, no longer complies with planning standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50, then ensure the change is rejected, modified, or processed as an exemption request under 10 CFR 50.12, Specific Exemptions, rather than under 10 CFR 50.54(q). Address each Planning Standard identified in Section IX. Continue to Section XI.

Justification:

Proposed change 2 removes a statement that Growl tests are performed after preventative and on-demand maintenance. The original statement in the Emergency Plan was written and implemented with the Duke Energy Common Emergency Plan to ensure functionality is achieved after maintenance. A Growl Test does ensure functionality of a siren, however, there are other methods to ensure siren functionality after maintenance. After some run time under the Duke Energy Common Emergency Plan, Duke Energy has received feedback that performing a Growl Test after all maintenance does have some negative effects that could be avoided. Sounding a siren could negatively impact the public to think something is occurring that may require some action. In most cases, information is provided to the public that maintenance is taking place, however, the public may still be unaware. The public may call local 911 centers because of the Growl Tests to gain understanding of why the sirens are sounding. These calls tie up phone lines and telecommunicators in the 911 centers, and possibly the Emergency Management personnel responding to calls. After considerations, it was determined that not all maintenance performed requires a Growl Test. This is the reason for the change to no longer require a Growl Test after all "preventative and on-demand maintenance". To ensure functionality, testing will be determined based on the maintenance performed in accordance with AD-EP-ALL-0305, Fleet Emergency Preparedness (EP) Alert and Notification System (ANS) Siren Program. This procedure provides instructions for maintaining, scheduling, testing, documenting, and reporting the performance of the Alert and Notification System (ANS) sirens. Some maintenance may only require a communications test if, for example, a radio, or antenna, or other component was worked that did not involve components that produce sound from the siren. Maintenance that did occur on components that produce sound from the siren (horn, amplifier, driver, etc.) may still require a Growl Test to ensure functionality. This change does not reduce testing of a siren after preventative or on-demand maintenance. This proposed change allows for a more appropriate test to ensure functionality based on the components requiring maintenance.

Additionally, proposed change 2 adds the statement to the Growl Test bullet that a growl test fulfills the requirements of a silent test. This statement is being added to the emergency plan as an enhancement. Conducting a Silent Test demonstrates an inaudible test to confirm radio communications and rotation, depending on the type of siren being tested. Conducting a Growl Test also confirms radio communications and rotation, depending on the type of siren being tested, while also producing a short duration audible noise. In all cases a Growl Test exercises the functionality of a silent test and more, by sounding the siren. Therefore, a Growl Test fulfills the requirements for the Silent Test.

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 9

10 CFR 50.54(q) Review Form

Proposed Change 3 adds a statement to the end of section F.3 that post maintenance testing is conducted to ensure the siren is fully functional. This proposed change was added below the type of siren test and removed from the Growl Test bullet to clarify that various testing methods may be used to ensure siren functionality. To ensure functionality, testing will be determined based on the maintenance performed in accordance with AD-EP-ALL-0305, Fleet Emergency Preparedness (EP) Alert and Notification System (ANS) Siren Program. This procedure provides instructions for maintaining, scheduling, testing, documenting, and reporting the performance of the Alert and Notification System (ANS) sirens. Some maintenance may only require a communications test if, for example, a radio, or antenna, or other component was worked that did not involve components that produce sound from the siren. Maintenance that did occur on components that produce sound from the siren (horn, amplifier, driver, etc.) may still require a Growl Test to ensure functionality. This change does not reduce testing of a siren after preventative or on-demand maintenance. This proposed change allows for a more appropriate test to ensure functionality based on the components requiring maintenance.

The proposed changes above do not alter the testing requirements for Duke Energy Alert and Notification System (ANS) as agreed upon with the Duke Energy Nuclear Sites' ANS Design Reports. Silent Tests continue to be conducted bi-weekly, Growl Tests continue to be conducted quarterly, and Full Cycle Tests continue to be conducted annually. Testing to ensure functionality after maintenance continues to be conducted. These proposed changes simply provide different methods of testing based on the components being worked, as well as providing clarification that a Growl Test performs the same and more function than the Silent Test. The proposed changes do not alter any maintenance conducted, preventative or corrective, required by the Emergency Plan, site procedures, or the Duke Energy Sites' Alert and Notification Design reports. A means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone continues to be established and provisions continue to exist for prompt communications among principal response organizations to emergency personnel and to the public. Therefore, these proposed changes continue to comply with 10 CFR50.47 (b)(5), and (b)(6).

Section XI: Description of Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions
Address each function identified in **Section IX. Continue to Section XII.**

Justification:

Proposed change 2 removes a statement that Growl tests are performed after preventative and on-demand maintenance. The original statement in the Emergency Plan was written and implemented with the Duke Energy Common Emergency Plan to ensure functionality is achieved after maintenance. A Growl Test does ensure functionality of a siren, however, there are other methods to ensure siren functionality after maintenance. After some run time under the Duke Energy Common Emergency Plan, Duke Energy has received feedback that performing a Growl Test after all maintenance does have some negative effects that could be avoided. Sounding a siren could negatively impact the public to think something is occurring that may require some action. In most cases, information is provided to the public that maintenance is taking place, however, the public may still be unaware. The public may call local 911 centers because of the Growl Tests to gain understanding of why the sirens are sounding. These calls tie up phone lines and telecommunicators in the 911 centers, and possibly the Emergency Management personnel responding to calls. After considerations, it was determined that not all maintenance performed requires a Growl Test. This is the reason for the change to no longer require a Growl Test after all "preventative and on-demand maintenance". To ensure functionality, testing will be determined based on the maintenance performed in accordance with AD-EP-ALL-0305, Fleet Emergency Preparedness (EP) Alert and Notification System (ANS) Siren Program. This procedure provides instructions for maintaining, scheduling, testing, documenting, and reporting the performance of the Alert and Notification System (ANS) sirens. Some maintenance may only require a communications test if, for example, a radio, or antenna, or other component was worked that did not involve components that produce sound from the siren. Maintenance that did occur on components that produce sound from the siren (horn, amplifier, driver, etc.) may still require a Growl Test to ensure functionality. This change does not reduce testing of a siren after preventative or on-demand maintenance.

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 9

10 CFR 50.54(q) Review Form

This proposed change allows for a more appropriate test to ensure functionality based on the components requiring maintenance.

Additionally, proposed change 2 adds the statement to the Growl Test bullet that a growl test fulfills the requirements of a silent test. This statement is being added to the emergency plan as an enhancement. Conducting a Silent Test demonstrates an inaudible test to confirm radio communications and rotation, depending on the type of siren being tested. Conducting a Growl Test also confirms radio communications and rotation, depending on the type of siren being tested, while also producing a short duration audible noise. In all cases, a Growl Test exercises the functionality of a silent test and more, by sounding the siren. Therefore, a Growl Test fulfills the requirements for the Silent Test.

Proposed Change 3 adds a statement to the end of section F.3 that post maintenance testing is conducted to ensure the siren is fully functional. This proposed change was added below the type of siren test and removed from the Growl Test bullet to clarify that various testing methods may be used to ensure siren functionality. To ensure functionality, testing will be determined based on the maintenance performed in accordance with AD-EP-ALL-0305, Fleet Emergency Preparedness (EP) Alert and Notification System (ANS) Siren Program. This procedure provides instructions for maintaining, scheduling, testing, documenting, and reporting the performance of the Alert and Notification System (ANS) sirens. Some maintenance may only require a communications test if, for example, a radio, or antenna, or other component was worked that did not involve components that produce sound from the siren. Maintenance that did occur on components that produce sound from the siren (horn, amplifier, driver, etc.) may still require a Growl Test to ensure functionality. This change does not reduce testing of a siren after preventative or on-demand maintenance. This proposed change allows for a more appropriate test to ensure functionality based on the components requiring maintenance.

The proposed changes above do not alter the testing requirements for Duke Energy Alert and Notification System (ANS) as agreed upon with the Duke Energy Nuclear Sites' ANS Design Reports. Silent Tests continue to be conducted bi-weekly, Growl Tests continue to be conducted quarterly, and Full Cycle Tests continue to be conducted annually. Testing to ensure functionality after maintenance continues to be conducted. These proposed changes simply provide different methods of testing based on the components being worked, as well as providing clarification that a Growl Test performs the same and more function than the Silent Test. The proposed changes do not alter any maintenance conducted, preventative or corrective, required by the Emergency Plan, site procedures, or the Duke Energy Sites' Alert and Notification Design reports. Systems continue to be established for prompt communication among principal emergency response organizations.

The proposed changes described provide assurance that the normal plant operating organization and ERO has the ability and capability to:

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

The above proposed changes to the Duke Energy Common Emergency Plan continue to comply with the licensees' FEMA-approved ANS design reports and supporting FEMA approval letters. Therefore, these proposed changes continue to comply with 10 CFR 50.47(b)(5) and do not reduce the effectiveness of the Emergency Plan or site-specific emergency plan annexes.

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 9

Attachment 1
Page 11 of 12

10 CFR 50.54(q) Review Form

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

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

EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	AD-EP-ALL-0602
	Rev. 9

Attachment 1
Page 12 of 12

10 CFR 50.54(q) Review Form

Section XIV: Signatures:		
EP CFAM Final Approval is required for changes affecting Program Element 4a of Section VIII . If CFAM approval is NOT required, then mark the EP CFAM signature block as not applicable (N/A) to indicate that signature is not required. Section XIV as applicable.		
Preparer Name (Print): Eric White	Preparer Signature: See CAS	Date: See CAS
Reviewer Name (Print): Michael Coyle	Reviewer Signature: See CAS	Date: See CAS
Approver Name (Print): David Thompson	Approver Signature: See CAS	Date: See CAS
Approver (EP CFAM, as required) Name (Print): N/A	Approver Signature: N/A	Date: N/A

QA RECORD