

INSPECTION PROCEDURE 71114 ATTACHMENT 4

EMERGENCY ACTION LEVEL AND EMERGENCY PLAN CHANGES

Effective Date: **July 1, 2026**

PROGRAM APPLICABILITY: IMC 2515 A

CORNERSTONE: Emergency Preparedness

INSPECTION BASES: IMC 0308

SAMPLE REQUIREMENTS:

Sample Requirements		Minimum Baseline Completion Sample Requirements		Budgeted Range	
Sample Type	Section	Frequency	Sample Size	Samples	Hours
EAL and emergency plan changes	02.01 - 02.04	Biennial	1	1	10-12 hours, depending on the inspection opportunities

71114.04-01 INSPECTION OBJECTIVE

Evaluate the efficacy of the emergency plan **change management process to ensure licensees have not implemented any changes that have** reduced the effectiveness of the emergency plan without the U.S. Nuclear Regulatory Commission’s (NRC’s) approval prior to being implemented.

Evaluate **the ability of the licensee to maintain the ability to effectively implement the emergency plan when licensee changes are made to other site procedures or programs not considered to be part of the licensee emergency plan or implementing procedures.**

71114.04-02 INSPECTION REQUIREMENTS

NOTE: This inspection is to be implemented in parallel with the guidance of IP 71114 as applicable.

The “emergency plan” is defined as including any document that describes the programmatic methods used by the licensee to maintain preparedness and to respond to an emergency, and to demonstrate compliance with the requirements of Appendix E, and for nuclear power reactors, the planning standards of § 50.47(b).

Section 50.54(q)(1)(iv) defines the term “reduction in effectiveness” as a change to the emergency plan that results in a reduction of the licensee’s capability to perform an emergency planning function in the event of a radiological emergency. The phrase “reduction in effectiveness” is an evaluation concept that is used in § 50.54(q) to differentiate between changes that the licensee is allowed to make without prior NRC approval and those that require prior NRC approval. Only changes related to the risk-significant planning standards (RSPS) need to be evaluated to ensure that the 50.54(q) process is being used effectively. All other changes need to be evaluated to ensure compliance with the applicable regulation only. See RG 1.219 for additional guidance.

If any emergency plan revision is so extensive that the inspector would expend more than the budgeted hours to complete the review, the inspector should consult with the Office of the Chief Nuclear Reactor Inspector, Division of Oversight and Compliance Programs, Reactor Inspection Branch (CNRI/DOCP/RIB) for consideration in submitting the revision to the Office of Nuclear Reactor Regulation (NRR) for review. This would allow the inspector to focus on completion of the other inspection samples.

Some licensees perform emergency plan changes at the fleet level. The intent of this procedure is not to duplicate the same review across all sites in the fleet. Instead, the inspector should focus their review on the site-specific aspects of a change that affects multiple units across a fleet to ensure there are no site-specific differences that could result in a reduction in effectiveness. However, any identified site-specific issues should be reviewed to determine if they impact the other sites as well.

This inspection is not intended to take the place of the licensing process. Any changes reviewed during the inspection are made on a sampling basis and a lack of inspection findings does not constitute formal NRC approval of the changes.

The inspector should select areas to inspect for at least the RSPS changes, and then if time permits, additional areas as listed.

02.01 ***Review all licensee EAL changes and EAL basis document changes not already submitted to the NRC for approval to determine if any reduced the effectiveness of the EAL scheme. [C1]***

02.02 **Screen all emergency plan changes and select a sample of the changes for review to ensure the changes did not reduce the effectiveness of the emergency plan. Lower tier documents may be considered for this review if these lower tier documents are controlled by the licensee via 10 CFR 50.54 (q).**

02.03 **Review 10 CFR 50.54(q) emergency plan change process and procedures.**

02.04 **Screen the corrective action/reports for issues to determine if the licensee is complying with 10 CFR 50.54(q)(2).**

71114.04-03 INSPECTION GUIDANCE

03.01 EAL and EAL Bases Document Change Review

- a. Licensees **are** required to have an EAL Bases Document. The bases document is considered an integral part of the **licensee’s EAL scheme** and should be controlled

accordingly. The EAL Bases Document should be readily available for decision makers to clarify the intent of the EAL and provide the necessary context. The EAL basis document should not contain information that modifies the meaning or intent of the initiating condition (IC) or EAL or give direction for actions beyond those necessary to obtain the IC or EAL threshold values except for those such as dose assessments, chemistry sampling, reactor coolant system leak rate calculation, etc., without this information being placed onto the applicable EAL Wallboard.

1. When reviewing EAL changes, the inspector should be sensitive to EALs that refer to other documents, such as the security contingency plan, industrial hygiene standards, Offsite Dose Calculation Manual, and manufacturer's specifications. The referenced documents may be considered sensitive or may not be readily available to the decision makers; however, the information in the EAL Bases Document should contain the information necessary to provide the appropriate context. The inspector should review changes to the EAL and the EAL Bases Document together.

Review the licensee's documentation used to support their 10 CFR 50.54(q) determination. Evaluate this documentation to determine if the licensee's position is justifiable and appropriate.

2. Contact **CNRI/DOCP/RIB** when assistance in determining a potential **reduction in effectiveness (RIE)** is needed.
3. If the licensee made the EAL change(s) due to receipt of a Safety Evaluation Report (SER) or due to NRC direction via advisories, orders, bulletins, etc., review the change and evaluate if the change was made in accordance with the stated NRC guidance or SER.
4. *Verify that the licensee **offered** the annual EAL review with State/County authorities in accordance with the requirements of 10 CFR 50, Appendix E, Section IV.B. [C1]*

03.02 Emergency Plan Change Review.

Licenses may develop alternative methods for meeting the planning standards and these should be considered for adequacy, however these alternative methods should have been approved by the NRC prior to implementation. If it appears that an emergency plan element is not in compliance with the requirements of 10 CFR 50.47(b) or Appendix E to Part 50, the situation may be a failure to meet a planning standard or regulatory requirement. Refer to RIS 2005-02 and RG 1.219 and contact NRC HQ to aid in determining potential RIEs.

Screen the list of changes to the **RSPS sections** of the **emergency plan** and **select samples** of the changes for review to ensure the changes did not reduce the effectiveness of the emergency plan. Lower tier documents may be considered for this review if these lower tier documents are controlled by the licensee via 10 CFR 50.54 (q).

If time permits, screen the list of changes to the other sections of the emergency plan and select a sample (or samples if time permits) of the changes for review to ensure the changes continue to comply with the applicable regulation. It is not necessary to review to determine if the change(s) result in a RIE. Lower tier documents may be considered

for this review if these lower tier documents are controlled by the licensee via 10 CFR 50.54 (q).

03.03 Review 10 CFR 50.54(q) Emergency Plan Change Process and Practice.

- a. Review 10 CFR 50.54(q) implementing procedures and verify individuals responsible for performing the screenings and evaluation understand the intent and procedure steps (i.e., reviews are to be performed against the last emergency plan with an SER).
- b. Verify screenings and evaluations contain a level of detail appropriate to support the change (i.e., does the screening block for a given planning standard describe more than just “yes” or “no”).
- c. Review licensee 10 CFR 50.54(q)(3) violations since the last inspection to determine if the violation could or should have been prevented by an appropriate and accurate screening or evaluation and if so has the licensee taken action to correct the issue.

03.04 Problem Identification and Resolution

- a. Screen the corrective action/reports for issues related to the following to determine if the licensee is complying with 10 CFR 50.54(q)(2):
 - Shift staffing levels
 - Department staffing levels that may impact ERO staffing requirements
 - Instrumentation or procedures related to EALs
 - Operations, Fire Brigade, or Security response protocols
 - Emergency response facilities, including communication systems

71114.04-04 REFERENCES

Information Notice 2005-019, “Effect of Plant Configuration Changes on the Emergency Plan”

Regulatory Guide 1.219, “Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors”

Regulatory Issue Summary (RIS) 2003-18, “Use of NEI 99-01, ‘Methodology for Development of Emergency Action Levels,’ Revision 4, Dated January 2003,” and supplements

RIS 2005-02, “Clarifying the Process for Making Emergency Plan Changes,” February 14, 2005

END

Attachment 1: Request for Information (RFI)

If not already in ADAMS, the request for information can include:

- All changes made to EALs since last inspection
- List of changes (just the title and scope, no details needed) made to other sections of the E-Plan related to 10 CFR 50.47(b)(5, 9, and 10)
- List of changes (just the title and scope, no details needed) made to other sections of the E-Plan related to the other planning standards
- List of all corrective actions/condition reports (just title and scope, no details needed) related to 10 CFR 50.54(q) initiated since the last inspection.
- List of all corrective actions/condition reports(just title and scope, no details needed) related to:
 - Shift staffing levels
 - Department staffing levels that may impact ERO staffing requirements
 - Instrumentation or procedures related to EALs
 - Operations, Fire Brigade, or Security response protocols
 - Emergency response facilities, including communication systems
- Other (as determined by regional inspector)

Attachment 2: Revision History for IP 71114.04

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information)
N/A	10/25/06	Completed 4-year historical CN search.	N/A	N/A
C1	09/09/01	<i>Revised to add previously deleted inspection requirement considered necessary for the baseline inspection program.</i> Reference is Davis-Besse Lessons Learned Task Force Item No. 3.3.4.7. (this commitment was confirmed to be still in effect, as of 9/24/08)	N/A	N/A
	10/25/06 CN 06-029	Complete rewrite of document structure to align it with RIS 2005-02 concerning the correct process for making Emergency Plan changes with two clarifying flowcharts (Figures 1 & 2), addition to meet one commitment.	N/A	ML061790125
	10/31/08 CN 08-031	Revision to incorporate a review of security-related Emergency Action Levels and Emergency Plan changes	No	ML081640372
	ML15245A748 07/21/16 CN 16-017	<p>Editorial changes:</p> <ul style="list-style-type: none"> Removed "Inspection Bases" and "Level of Effort" and added "Inspection Objective" in accordance with IMC 0040 "Preparing, Revising and Issuing Documents for the NRC Inspection Manual" formatting expectations. Change "decrease in effectiveness" to "reduction in effectiveness" and corresponding DIE to RIE Align procedure with standard section numbering format of completion section under 711XX.XX-05 and the references under 711XX.XX-06 (see ROP Feedback Form 71114-1925) <p>Added statement "This inspection procedure may be performed in the office or on site" to the inspection objective section.</p> <p>Added Inspection requirement 02.03 Review 10 CFR 50.54(q) emergency plan change process and practice and guidance step 03.03 from IP 71114.05 to this IP. (continued)</p>	None	ML15245A773 71114.04-1925 ML15245A742

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information)
		<p>Updated 10 CFR 50.54(q) description in accordance with new EP rule effective December 2011</p> <p>Added 10 CFR 50 Appendix E.IV.B guidance for a licensee desiring to change its entire EAL scheme would require prior NRC approval before implementing the change and that less substantial EAL changes may be made using the § 50.54(q) process.</p> <p>Added description of 10 CFR 73.58 "Safety/security interface requirements for nuclear power reactors"</p> <p>Inspection Guidance step 03.01, replaced EAL scheme references with NRC endorsed schemes.</p> <p>Deleted step 03.02.b – Skill of the craft</p> <p>Added section 71114.04-06 "References"</p> <p>Inconsistent use of the term "emergency response plan" and "emergency plan" changed to "emergency plan."</p> <p>Move documents referenced within the procedure to the "references" section.</p> <p>Added 02.03 "Review 10 CFR 50.54(q) plan change process and practice" moved in from IP 71114.05.</p> <p>"General Guidance" Page 3</p> <ul style="list-style-type: none"> • 2 paragraph change to "which with it is submitted." • 4th paragraph last sentence "A licensee desiring to change its entire emergency action level scheme shall submit an amendment request for its license and receive NRC approval before implementing the change per Appendix E.IV.B.2 of 10 CFR 50." <p>03.01 "EAL and EAL Bases Document Change Review"</p> <ul style="list-style-type: none"> • Change 4th paragraph to read ", and manufacturer's specifications. • added "together" to the 2nd to last paragraph last sentence "The inspector should review changes to the EAL and the EAL Bases Document together" <p>03.02 "Emergency Plan Change Review," removed specifics about how to handle enforcement and documentation of.</p> <p>(Continued)</p>		

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information)
		<p>Added References section 71114.06</p> <p>Added to section 71114.04-05 "Procedure Completion" the IP 71152 "Problem Identification and Resolution" expectation for routine PI&R activity reviews to be approximately 10 to 15 percent of the baseline cornerstone inspection procedure resources estimates. The 10 to 15 percent approximation is based on the overall expected inspection effort and is a general estimate only.</p>		
	<p>ML24309A267 07/01/26 CN 26-029</p>	<p>Per EP Initiatives implemented per EO 14300 Section 5(g) and the Advance Act, Sect 507.(d)(1)(A, B, and C). These changes are based upon:</p> <ul style="list-style-type: none"> • Rebaseline of EP Inspection Procedures to incorporate lessons-learned, enhance inspections, and reinforce the requirements for qualified inspectors, including enhancing PI&R guidance. • Incorporated EP IP frequency and resource planning information. • Incorporated "Request for Information" guidance into an attachment. • Limit RIE reviews to RSPS; all other planning standards to be reviewed for regulatory compliance only. • Add guidance for effective PI&R that includes ensuring other site changes do not impact the ability to effectively implement the emergency plan. 		