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Serial: RA-25-0287
January 7, 2026

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
Renewed Facility Operating License Nos. DPR-71 and DPR-62
Docket Nos. 50-325 and 50-324

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

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

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

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

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

SUBJECT: EP-ALL-EPLAN, "DUKE ENERGY COMMON EMERGENCY PLAN," Revision 007 Summary of Changes

In accordance with 10 CFR 50.54(q), Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively referred to as Duke Energy), is submitting a revision summary for EP-ALL-EPLAN, "DUKE ENERGY COMMON EMERGENCY PLAN," Revision 007.

The Duke Energy Common Emergency Plan provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to all nuclear power plants operated by Duke Energy, and plant employees.

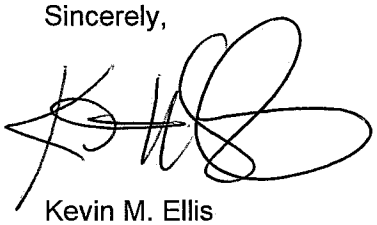
The Common Emergency Plan is being revised to update titles of external organizations and documents, address observations from audits, drills, and exercises, address users' comments, and incorporate changes as part of general Emergency Plan maintenance.

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), a summary of analysis is included as Attachment 1.

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: 10 CFR 50.54(q) Review Form

cc:

USNRC, Region II Regional Administrator
USNRC NRR Project Manager for BNP
USNRC NRR Project Manager for CNS
USNRC NRR Project Manager for HNP
USNRC NRR Project Manager for MNS
USNRC NRR Project Manager for ONS
USNRC NRR Project Manager for RNP
USNRC Senior Resident Inspector for BNP
USNRC Senior Resident Inspector for CNS
USNRC Senior Resident Inspector for HNP
USNRC Senior Resident Inspector for MNS
USNRC Senior Resident Inspector for ONS
USNRC Senior Resident Inspector for RNP

Attachment 1: 10 CFR 50.54(q) Review Form

(20 pages after this coversheet)

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

Section I: 10 CFR 50.54(q) Review Number: (EREG #):					**2575621**
Applicable Sites and Applicability Determination # (5AD)					
■ **BNP**	2574204	■ **CNS**	2574205	■ **HNP**	2574206
■ **MNS**	2574207	■ **ONS**	2574208	■ **RNP**	2574209

Document #, EC #, or N/A	**Revision # or N/A**	**Document or Activity Title**
EP-ALL-EPLAN	7	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.**

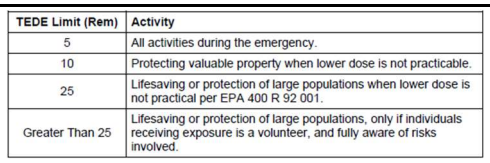
Activity/Changes:

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 update titles of external organizations and documents, address observations from audits, drills, and exercises, address users' comments, and incorporate changes as part of general Emergency Plan maintenance.

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

Change #	Section or Step #	Change From	Change to
1	Throughout	*Revision number, implementation date, page numbers, table of contents, and revision summary.*	*Revision number, implementation date, page numbers, table of contents, and revision summary.*
2	1.0 INTRODUCTION (seventh bulleted statement)	Emergency Plan Implementing Procedures - Corporate and site procedures that are used to implement the overall emergency plan for the site. Site-specific implementing procedures are listed in Table P.7-1, Emergency Plan Response and Administrative Procedures of the site annexes.	Emergency Plan Implementing Procedures - Corporate and site procedures that are used to implement the overall emergency plan for the site. Corporate implementing procedures are listed in Attachment 3, Procedures Required to Maintain the Emergency Plan, of the common emergency plan and Site-specific implementing procedures are listed in Table P.7-1, Emergency Plan Response and Administrative Procedures, of the site annexes.
3	Throughout	(1) SC Department of Health and Environmental Control (2) State of South Carolina Department of Health and Environmental Control (3) (DHEC) (*various iterations of organization title*)	SC Department of Environmental Services (DES)
4	4.0 SECTION B – EMERGENCY RESPONSE ORGANIZATION Sub-section B.3	The Duke Energy ERO is composed of; (1) on-shift personnel located at the site at all times, and (2) augmenting personnel located either onsite or offsite who are on duty at all times.	The Duke Energy ERO is composed of; (1) on-shift personnel located at the site at all times, and (2) augmenting personnel located either onsite or offsite who are available for augmenting position responsibilities at all times.
5	8.0 SECTION F – EMERGENCY COMMUNICATIONS Sub-section F.1.a	… Voice communication systems available include: …	… Communication systems available include: …
6	8.0 SECTION F – EMERGENCY COMMUNICATIONS Sub-section F.1.b	… Each site has the following voice communication systems available for use by the ERO for performing emergency communications: …	… Each site has the following communication systems available for use by the ERO for performing emergency communications: …
7	13.0	Onsite exposure guidelines for	Onsite exposure guidelines for

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

	SECTION K – RADIOLOGICAL EXPOSURE CONTROL Sub-section K.1.a	emergency workers, consistent with EPA 400-R-92-001, Manual of Protective Action Guides and Protective Actions for Nuclear Incidents, U.S. Environmental Protection Agency, May 1992, Table 2-2, "Guidance on Dose Limits for Workers Performing Emergency Services," have been established as follows:	emergency workers have been established and are consistent with EPA-400-R-17-001, PAG Manual: Protective Action Guides and Planning Guidance for Radiological Incidents.
8	13.0 SECTION K – RADIOLOGICAL EXPOSURE CONTROL Sub-section K.1.a (table and associated notes)	 **NOTES** • Emergency exposure limits are exclusive of current occupational exposure. • Only one emergency exposure is allowed per lifetime. • Dose to lens of the eye is limited to three times listed value. • Dose to other organs, including skin and body extremities, is limited to ten times listed value.	(*Removed from document.*)
9	14.0 SECTION L – MEDICAL AND PUBLIC HEALTH EFFORT Sub-section L.2.e	Primary and backup offsite medical facilities to treat contaminated injured personnel are described in the site-specific annexes to the Duke Energy Common Emergency Plan under element L.2.b. Contact information is contained in CSD-EP-ALL-0104-01, Emergency Telephone Directory. The Radiation Emergency Assistance Center Training Site (REAC/TS) located at Oak Ridge, Tennessee, will respond to and/or provide advice and assistance to offsite medical facilities in the event of a severe radiation accident.	The Radiation Emergency Assistance Center Training Site (REAC/TS) located at Oak Ridge, Tennessee, will respond to and/or provide advice and assistance to offsite medical facilities in the event of a severe radiation accident. Contact information is contained in CSD-EP-ALL-0104-01, Emergency Telephone Directory.
10	16.0 SECTION N – EXERCISES AND DRILLS Sub-section N.3.b	The rapid escalation scenario will begin with an initial classification of or rapidly escalate to the Site Area Emergency level while event response is performed from the MCR.	The rapid escalation scenario will begin with an initial classification of or rapidly escalate to a Site Area Emergency or General Emergency level while event response is performed from the Control Room.

TEDE Limit (Rem)	Activity
5	All activities during the emergency.
10	Protecting valuable property when lower dose is not practicable.
25	Lifesaving or protection of large populations when lower dose is not practical per EPA 400 R 92 001.
Greater Than 25	Lifesaving or protection of large populations, only if individuals receiving exposure is a volunteer, and fully aware of risks involved.

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

11	16.0 SECTION N – EXERCISES AND DRILLS Sub-section N.4.a	The scope of the emergency medical drill will include a simulated contaminated individual and participation by support services agencies (i.e., ambulance and offsite medical treatment facility).	The scope of the emergency medical drill will include a simulated contaminated individual and contain provisions for participation by support services agencies (i.e., ambulance and offsite medical treatment facility).
12	16.0 SECTION N – EXERCISES AND DRILLS Sub-sections N.4.h and N.4.i	(*Added to document.*)	The drill will occur any time of day on a weekday holiday, any time of day on a weekend day, or between the hours of 6:00 p.m. and 4:00 a.m. on a normal Duke Energy workday.
13	Attachment 4 Appendix 1 - Definitions	(*Added to document.*)	**Off-hours:** any time of day on a weekday holiday, any time of day on a weekend day, or between the hours of 6:00 p.m. and 4:00 a.m. on a normal Duke Energy workday.

<< 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 B, F, K, L, N
- 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 6, Section B, F, K, L, N
- EP-BNP-EPLAN-ANNEX, Duke Energy Brunswick Emergency Plan Annex, Rev 4
- 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 3
- EP-ONS-EPLAN-ANNEX, Duke Energy Oconee Emergency Plan Annex, Rev 1
- EP-RNP-EPLAN-ANNEX, Duke Energy Robinson Emergency Plan Annex, Rev 3

The differences in the approved and the current revision of the Emergency Plan have been reviewed and are determined to meet regulatory requirements throughout the course of revisions.

<< 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 ☐ No ☐
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 ☐ No ☐
3. Do any elements of the proposed activity change the Evacuation Time Estimate results?	Yes ☐ No ☐
4. Do any elements of the proposed activity change the On-Shift Staffing Analysis results?	Yes ☐ No ☐
5. Does the Proposed activity require a change to the Emergency Plan Programmatic Description?	Yes ☐ No ☐
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:

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

Section VI: Activity Previously Reviewed? ***Is this activity fully bounded by an NRC approved 10CFR50.90 submittal or Alert and Notification System Design Report?***		
☐	Yes	10 CFR 50.54(q) Evaluation is not required. Identify bounding source document below and continue to ***Section XII.***
■	No	Continue to ***Section VII.***
☐	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		
☐	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.
☐	No	None of the Activities/Changes listed in ***Section II*** are editorial/typographical changes. Continue to ***Section VIII.***
■	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, implementation dates, page numbers, table of contents, 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.

Proposed Change 3 corrects the department name of the South Carolina Department of Environmental Services (DES). On July 1, 2024, the South Carolina Department of Health and Environmental Control (DHEC) was reorganized into Department of Environmental Services (DES) and the Department of Public Health (DPH). DHEC's public health and healthcare quality programs transitioned to DPH, while its environmental programs were inherited by DES. Duke Energy only interfaces with the Department of Environmental Services (DES). Outside of the state government's internal organizational structure, there is no change in authority, responsibilities, or reporting relationships between Duke Energy and the State of South Carolina. The proposed change corrects the department's name throughout the document with no change of intent of the Emergency Plan; therefore, this change is 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.	☐
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.	☐
2	**10 CFR 50.47(b)(2) Onsite Emergency Organization**	
2a	Process ensures that on shift emergency response responsibilities are staffed and assigned	☐
2b	The process for timely augmentation of onshift staff is established and maintained.	■
3	**10 CFR 50.47(b)(3) Emergency Response Support and Resources**	
3a	Arrangements for requesting and using off site assistance have been made.	☐
3b	State and local staff can be accommodated at the EOF in accordance with the emergency plan.	☐
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)**	☐
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.	☐
5b	Administrative and physical means have been established for alerting and providing prompt instructions to public within the plume exposure pathway.	☐
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	☐
6	**10 CFR 50.47(b)(6) Emergency Communications**	
6a	Systems are established for prompt communication among principal emergency response organizations.	■
6b	Systems are established for prompt communication to emergency response personnel.	☐
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).	☐
7b	Coordinated dissemination of public information during emergencies is established.	☐
8	**10 CFR 50.47(b)(8) Emergency Facilities and Equipment**	
8a	Adequate facilities are maintained to support emergency response	☐
8b	Adequate equipment is maintained to support emergency response.	☐
9	**10 CFR 50.47(b)(9) Accident Assessment**	**RS**
9a	Methods, systems, and equipment for assessment of radioactive releases are in use.	☐
10	**10 CFR 50.47(b) (10) Protective Response**	**RS**
10a	A range of public PARs is available for implementation during emergencies.	☐
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	☐

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

	authorities.	
10c	A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.	☐
10d	KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public.	☐
11	**10 CFR 50.47(b) (11) Radiological Exposure Control**	
11a	The resources for controlling radiological exposures for emergency workers are established.	■
12	**10 CFR 50.47(b) (12) Medical and Public Health Support**	
12a	Arrangements are made for medical services for contaminated, injured individuals.	■
13	**10 CFR 50.47(b) (13) Recovery Planning and Post-Accident Operations**	
13a	Plans for recovery and reentry are developed.	☐
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.	■
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.	☐
14c	Identified weaknesses are corrected.	☐
15	**10 CFR 50.47(b) (15) Emergency Response Training**	
15a	Training is provided to emergency responders.	☐
16	**10 CFR 50.47(b) (16) Emergency Plan Maintenance**	
16a	Responsibility for emergency plan development and review is established.	☐
16b	Planners responsible for emergency plan development and maintenance are properly trained.	☐

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 XII.***

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

Proposed Change 2 adds a reference to Attachment 3 for a list of all corporate (fleet) level EPIPs. Attachment 3 itself existed in previous revisions of the Common Emergency Plan. Adding the reference to Attachment 3 only provides additional citation within the step, thereby improving the usability of the document. The intent of the step is informational only, with no actionable context added. Thus, there is no impact to Emergency Planning elements or functions.

<< 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)(2) – Onsite Emergency Organization:

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.

10CFR50 Appendix E.IV.A. Organization (in part):

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:
2. A description of the onsite emergency response organization (ERO) with a detailed discussion of:
a. Authorities, responsibilities, and duties of the individual(s) who will take charge during an emergency;
b. Plant staff emergency assignments;
c. Authorities, responsibilities, and duties of an onsite emergency coordinator who shall be in charge of the exchange of information with offsite authorities responsible for coordinating and implementing offsite emergency measures.
3. A description, by position and function to be performed, of the licensee's headquarters personnel who will be sent to the plant site to augment the onsite emergency organization.
4. Identification, by position and function to be performed, of persons within the licensee organization who will be responsible for making offsite dose projections, and a description of how these projections will be made and the results transmitted to State and local authorities, NRC, and other appropriate governmental entities.
5. Identification, by position and function to be performed, of other employees of the licensee with special qualifications for coping with emergency conditions that may arise. Other persons with special qualifications, such as consultants, who are not employees of the licensee and who may be called upon for assistance for emergencies shall also be identified. The special qualifications of these persons shall be described.

The associated EP Function is Function 2b:

The process for timely augmentation of onshift staff is established and maintained.

The applicable program element is B.3:

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.

10CFR50.47(b)(6) – Emergency Communications:

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

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

10CFR50 Appendix E.IV.E Emergency Facilities and Equipment (in part):

Adequate provisions shall be made and described for emergency facilities and equipment, including:

9. At least one onsite and one offsite communications system; each system shall have a backup power source. All communication plans shall have arrangements for emergencies, including titles and alternates for those in charge at both ends of the communication links and the primary and backup means of communication. Where consistent with the function of the governmental agency, these arrangements will include:

a. Provision for communications with contiguous State/local governments within the plume exposure pathway EPZ. Such communications shall be tested monthly.

b. Provision for communications with Federal emergency response organizations. Such communications systems shall be tested annually.

c. Provision for communications among the nuclear power reactor control room, the onsite technical support center, and the emergency operations facility; and among the nuclear facility, the principal State and local emergency operations centers, and the field assessment teams. Such communications systems shall be tested annually.

d. Provisions for communications by the licensee with NRC Headquarters and the appropriate NRC Regional Office Operations Center from the nuclear power reactor control room, the onsite technical support center, and the emergency operations facility. Such communications shall be tested monthly.

The associated EP Function is Function 6a:

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

The applicable program elements are F.1.a and F.1.b:

F.1.a - Continuous capability for notification to, and activation of, the emergency response network, including a minimum of two independent communication links.
F.1.b - Communication with applicable organizations to include a description of the methods that may be used when contacting each organization.

10CFR50.47(b)(11) – 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.

10CFR50 Appendix E.IV.E Emergency Facilities and Equipment (in part):

Adequate provisions shall be made and described for emergency facilities and equipment, including:
1. Equipment at the site for personnel monitoring

The associated EP Function is Function 11a:

The resources for controlling radiological exposures for emergency workers are established.

The applicable program element is K.1.a:

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.

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

10CFR50.47(b)(12) – Medical and Public Health Support:

Arrangements are made for medical services for contaminated injured individuals.

10CFR50 Appendix E.IV.E Emergency Facilities and Equipment (in part):

Adequate provisions shall be made and described for emergency facilities and equipment, including:

5. Arrangements for medical service providers qualified to handle radiological emergencies onsite;

6. Arrangements for transportation of contaminated injured individuals from the site to specifically identified treatment facilities outside the site boundary;

7. Arrangements for treatment of individuals injured in support of licensed activities on the site at treatment facilities outside the site boundary;

The associated EP Function is Function 12a:

Arrangements are made for medical services for contaminated, injured individuals.

The applicable program element is L.2.e:

L.2.e - Contact information for facilities capable of treating overexposure to radioactive material.

10CFR50.47(b)(14) – Drills and Exercises:

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.

10CFR50 Appendix E.IV.F Training (in part):

h. The participation of State and local governments in an emergency exercise is not required to the extent that the applicant has identified those governments as refusing to participate further in emergency planning activities, pursuant to § 50.47(c)(1). In such cases, an exercise shall be held with the applicant or licensee and such governmental entities as elect to participate in the emergency planning process.

(j)(iii) In each 8-calendar-year exercise cycle, nuclear power reactor licensees shall vary the content of scenarios during exercises conducted under paragraph 2 of this section to provide the opportunity for the ERO to demonstrate proficiency in the key skills necessary to respond to the following scenario elements:

(3) An initial classification of, or rapid escalation to, a Site Area Emergency or General Emergency;

(5) Integration of offsite resources with onsite response.

The associated EP Function is Function 14a:

A drill and exercise program (including radiological, medical, health physics and other program areas) is established.

The applicable program elements are N.3.b, N.4.a, N.4.h, and N.4.i:

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

N.3.b - An initial classification of, or rapid escalation to, an SAE or GE.
N.4.a - 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).

N.4.h – Off-hours report-in drills are conducted biennially and are unannounced.

N.4.i - 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.

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

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 4 rephrases the term “on duty” to “available for augmenting position responsibilities.” The revised language removes ambiguity around “on duty” status, which could be misinterpreted as requiring continuous shift coverage. Additionally, "on-duty" is applicable to named individuals on the ERO roster; however, does not accurately encompass "pool position" ERO members who are not identified by name for position coverage. The expectation is that ERO response (including named "duty" personnel and pool position personnel) for a declared event is "all-call, all-come." The change improves clarity and consistency with actual ERO implementation and HR practices. There is no change is ERO augmented staff positions, number of required positions, duties, designated minimum and full staff, etc. There is no change in ERO reporting process or callout process. There is no change in the On-shift Staffing Analysis (OSSA). The change clarifies intent without altering the meaning or implementation of emergency response requirements. Timely augmentation of response capabilities continues to be available, and a process for timely augmentation of on shift staff is maintained; therefore, the change complies with Planning Standard 2.

Proposed Changes 5 and 6 removes the word “voice” from the term “voice communication” in two subsections under Section F – Emergency Communications. The change is requested by users due to the inaccuracy of the term “voice” as it relates to several listed systems and methods that do not involve real-time “voice to voice” communication. For example, State and County Offsite Emergency Notification System (SCOENS) is not a communication system that utilizes a real-time, direct (person-to-person) auditory connection. Rather, it utilizes automated, pre-recorded messaging. Another example is the Public Address (PA) System that involves a one-way “voice” communication to multiple personnel. And cellular telephones are a credited communication system but have the capability for text communications as well. There are no changes being made to the current communication methods in Section F, including the credited communication systems for notifying the NRC, the Offsite Response Organizations, and the ERO. Removal of the term “voice” is an improvement to the technical accuracy of the guidance. With the change, systems remain established, and provisions continue to exist for prompt communications among principal response organizations to emergency personnel and to the public; therefore, the change complies with Planning Standard 6.

Proposed Changes 7 and 8 updates a reference to the EPA Protective Action Guide (PAG) manual from EPA-400-R-92-001 to EPA-400-R-17-001, in connection with onsite worker radiological protection. Additionally, the change removes the EPA PAG worker dose limit table from subsection K.1.a. The updated reference is proposed since the EPA PAG Manual was revised in 2017. Recommended limits of exposure for emergency workers, which are imposed if high doses (5/10/25 Rem per year) are expected to be incurred over the response duration, remain unchanged from the 1992 PAG Manual. The table itself and the associated notes are not required to be in the Emergency Plan as the implementing procedure AD-EP-ALL-0205, Emergency Exposure Controls, appropriately contains it. The changes ensure the reader is pointed to the latest EPA PAG guidance, as well as removes redundancy between the Emergency Plan and an EPIP, without changing the intent of the Emergency Plan guidance. With the proposed changes implemented, resources and means for controlling radiological emergency exposures for workers remain established and remain consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides; therefore, the change complies with Planning Standard 11.

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

Proposed Change 9 removes an unnecessary statement within subsection L.2.e that refers the reader back to L.2.b for medical facilities to treat contaminated injured personnel. L.2.e is related to the treatment of overexposure to radioactive material (e.g., acute radiation exposure and accompanying symptoms) and the potential need for assistance to be provided to the medical facilities by the Radiation Emergency Assistance Center Training Site (REACT/S). It is already established in L.2.b that arrangements have been made with primary and backup medical facilities, so the reference in L.2.e is redundant information. L.2.e specifies that contact information is to be available for REACT/S; therefore, that statement is retained within the section (i.e., REACT/S contact information is and remains available in the Emergency Telephone Directory). The proposed change is an enhancement to the Emergency Plan by making the guidance more concise, thereby eliminating the potential for confusion. Duke Energy's arrangements for medical services of contaminated injured individuals (Letters of Agreement and Memorandums of Understanding with local hospitals) are unchanged; therefore, the change complies with Planning Standard 12.

Proposed Change 10 adds clarifying information to subsection N.3.b, Rapid Escalation drill guidance. Emergency Plan section N.3.b states that a rapid escalation exercise involves "an initial classification of, or rapid escalation to, an SAE [a Site Area Emergency] or GE [General Emergency]." The current revision guidance under section N.3.b only states "an initial classification of or rapidly escalate to the Site Area Emergency level…" (no mention of General Emergency). Hypothetically, an emergency exercise scenario can rapidly progress directly to a General Emergency level, bypass the Site Area Emergency-level conditions entirely, and still meet requirements under N.3.b. The proposed change adds the General Emergency option to the clarifying instructions, which is aligned to the intent of the associated regulation and the Emergency Plan. For additional clarity, the proposed change spells out the common acronym "MCR" into "Control Room." Periodic exercises continue to be conducted to evaluate major portions of emergency response capabilities, to develop and maintain key skills, and to identify and correct deficiencies. A drill and exercise program (including radiological, medical, health physics and other program areas) remains established; therefore, the change complies with Planning Standard 14.

Proposed Change 11 adds clarifying information to subsection N.4.a, Emergency Medical drill guidance. Emergency Plan section N.4.a states that an emergency medical drill involves "a simulated, contaminated individual and contain provisions for participation by support services agencies." The current revision guidance under section N.4.a states "the scope of the emergency medical drill will include a simulated contaminated individual and participation by support services agencies…" (no allowance for the offsite agencies to opt out). There are situations where a nuclear site may desire to conduct an emergency medical drill, and participation arrangements are offered to an ambulance team and hospital; however, neither agency is available or willing to participate. The conduct of the drill should still meet the requirements under N.4.a. The proposed change adds the option for offsite agency participation into the clarifying instructions, which is aligned to the intent of the associated regulation and the Emergency Plan. Periodic exercises continue to be conducted to evaluate major portions of emergency response capabilities, to develop and maintain key skills, and to identify and correct deficiencies. A drill and exercise program (including radiological, medical, health physics and other program areas) remains established; therefore, the change complies with Planning Standard 14.

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

Proposed Change 12 and 13 clarify the term “off hours” within the Emergency Plan. Proposed Change 12 adds identical statements for off-hours requirements under sections for N.4.h Off-Hours Report-In Drills and N.4.i Off-Hours Call-In Drills, while Proposed Change 13 adds a definition of the term “off-hours” to the list of definitions within Appendix 1 (Attachment 4 of the Emergency Plan). Per Section N.1.c, an “off-hours drill or exercise” consists of “any time of day on a weekday holiday, any time of day on a weekend day, or between the hours of 6:00p.m. and 4:00 a.m. on a normal Duke Energy workday.” However, N.4.h Off-Hours Report-In Drills and N.4.i Off-Hours Call-In Drills do not refer to N.1.c requirements, nor does either section provide further explanation of “off-hours”. There are no other instances of “off-hours” being referenced within the Duke Energy Common Emergency Plan. Adding a definition that aligns with N.1.c verbiage ensures that readers will not misinterpret the time requirement or assume “off-hours” could encompass any time period that falls outside of one’s own normal work hours for example. The proposed change adds the specific examples of “off-hours” into the clarifying instructions, which is aligned to the intent of the associated regulation and the Emergency Plan. The proposed changes provide an enhancement to the document by giving explicit examples of the time frame for meeting the requirement. Periodic exercises continue to be conducted to evaluate major portions of emergency response capabilities, to develop and maintain key skills, and to identify and correct deficiencies. A drill and exercise program (including radiological, medical, health physics and other program areas) remains established; therefore, the changes comply with Planning Standard 14.

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

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 4 rephrases the term “on duty” to “available for augmenting position responsibilities.” The revised language removes ambiguity around “on duty” status, which could be misinterpreted as requiring continuous shift coverage. Additionally, "on-duty" is applicable to named individuals on the ERO roster; however, does not accurately encompass "pool position" ERO members who are not identified by name for position coverage. The expectation is that ERO response (including named "duty" personnel and pool position personnel) for a declared event is "all-call, all-come." The change improves clarity and consistency with actual ERO implementation and HR practices. There is no change is ERO augmented staff positions, number of required positions, duties, designated minimum and full staff, etc. There is no change in ERO reporting process or callout process. There is no change in the On-shift Staffing Analysis (OSSA). The change clarifies intent without altering the meaning or implementation of emergency response requirements. Timely augmentation of response capabilities continues to be available, and a process for timely augmentation of on shift staff is maintained.

Proposed Changes 5 and 6 removes the word “voice” from the term “voice communication” in two subsections under Section F – Emergency Communications. The change is requested by users due to the inaccuracy of the term “voice” as it relates to several listed systems and methods that do not involve real-time “voice to voice” communication. For example, State and County Offsite Emergency Notification System (SCOENS) is not a communication system that utilizes a real-time, direct (person-to-person) auditory connection. Rather, it utilizes automated, pre-recorded messaging. Another example is the Public Address (PA) System that involves a one-way “voice” communication to multiple personnel. And cellular telephones are a credited communication system but have the capability for text communications as well. There are no changes being made to the current communication methods in Section F, including the credited communication systems for notifying the NRC, the Offsite Response Organizations, and the ERO. Removal of the term “voice” is an improvement to the technical accuracy of the guidance. With the change, systems remain established, and provisions continue to exist for prompt communications among principal response organizations to emergency personnel and to the public.

Proposed Changes 7 and 8 updates a reference to the EPA Protective Action Guide (PAG) manual from EPA-400-R-92-001 to EPA-400-R-17-001, in connection with onsite worker radiological protection. Additionally, the change removes the EPA PAG worker dose limit table from subsection K.1.a. The updated reference is proposed since the EPA PAG Manual was revised in 2017. Recommended limits of exposure for emergency workers, which are imposed if high doses (5/10/25 Rem per year) are expected to be incurred over the response duration, remain unchanged from the 1992 PAG Manual. The table itself and the associated notes are not required to be in the Emergency Plan as the implementing procedure AD-EP-ALL-0205, Emergency Exposure Controls, appropriately contains it. The changes ensure the reader is pointed to the latest EPA PAG guidance, as well as removes redundancy between the Emergency Plan and an EPIP, without changing the intent of the Emergency Plan guidance. With the proposed changes implemented, resources and means for controlling radiological emergency exposures for workers remain established and remain consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

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

Proposed Change 9 removes an unnecessary statement within subsection L.2.e that refers the reader back to L.2.b for medical facilities to treat contaminated injured personnel. L.2.e is related to the treatment of overexposure to radioactive material (e.g., acute radiation exposure and accompanying symptoms) and the potential need for assistance to be provided to the medical facilities by the Radiation Emergency Assistance Center Training Site (REACT/S). It is already established in L.2.b that arrangements have been made with primary and backup medical facilities, so the reference in L.2.e is redundant information. L.2.e specifies that contact information is to be available for REACT/S; therefore, that statement is retained within the section (i.e., REACT/S contact information is and remains available in the Emergency Telephone Directory). The proposed change is an enhancement to the Emergency Plan by making the guidance more concise, thereby eliminating the potential for confusion. Duke Energy's arrangements for medical services of contaminated injured individuals (Letters of Agreement and Memorandums of Understanding with local hospitals) are unchanged. Contact information for facilities capable of treating overexposure to radioactive material remains available.

Proposed Change 10 adds clarifying information to subsection N.3.b, Rapid Escalation drill guidance. Emergency Plan section N.3.b states that a rapid escalation exercise involves "an initial classification of, or rapid escalation to, an SAE [a Site Area Emergency] or GE [General Emergency]." The current revision guidance under section N.3.b only states "an initial classification of or rapidly escalate to the Site Area Emergency level…" (no mention of General Emergency). Hypothetically, an emergency exercise scenario can rapidly progress directly to a General Emergency level, bypass the Site Area Emergency-level conditions entirely, and still meet requirements under N.3.b. The proposed change adds the General Emergency option to the clarifying instructions, which is aligned to the intent of the associated regulation and the Emergency Plan. For additional clarity, the proposed change spells out the common acronym "MCR" into "Control Room." Periodic exercises continue to be conducted to evaluate major portions of emergency response capabilities, to develop and maintain key skills, and to identify and correct deficiencies. With the proposed change, a drill and exercise program (including radiological, medical, health physics and other program areas) remains established.

Proposed Change 11 adds clarifying information to subsection N.4.a, Emergency Medical drill guidance. Emergency Plan section N.4.a states that an emergency medical drill involves "a simulated, contaminated individual and contain provisions for participation by support services agencies." The current revision guidance under section N.4.a states "the scope of the emergency medical drill will include a simulated contaminated individual and participation by support services agencies…" (no allowance for the offsite agencies to opt out). There are situations where a nuclear site may desire to conduct an emergency medical drill, and participation arrangements are offered to an ambulance team and hospital; however, neither agency is available or willing to participate. The conduct of the drill should still meet the requirements under N.4.a. The proposed change adds the option for offsite agency participation into the clarifying instructions, which is aligned to the intent of the associated regulation and the Emergency Plan. Periodic exercises continue to be conducted to evaluate major portions of emergency response capabilities, to develop and maintain key skills, and to identify and correct deficiencies. With the proposed change, a drill and exercise program (including radiological, medical, health physics and other program areas) remains established.

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

Proposed Change 12 and 13 clarify the term “off hours” within the Emergency Plan. Proposed Change 12 adds identical statements for off-hours requirements under sections for N.4.h Off-Hours Report-In Drills and N.4.i Off-Hours Call-In Drills, while Proposed Change 13 adds a definition of the term “off-hours” to the list of definitions within Appendix 1 (Attachment 4 of the Emergency Plan). Per Section N.1.c, an “off-hours drill or exercise” consists of “any time of day on a weekday holiday, any time of day on a weekend day, or between the hours of 6:00p.m. and 4:00 a.m. on a normal Duke Energy workday.” However, N.4.h Off-Hours Report-In Drills and N.4.i Off-Hours Call-In Drills do not refer to N.1.c requirements, nor does either section provide further explanation of “off-hours”. There are no other instances of “off-hours” being referenced within the Duke Energy Common Emergency Plan. Adding a definition that aligns with N.1.c verbiage ensures that readers will not misinterpret the time requirement or assume “off-hours” could encompass any time period that falls outside of one’s own normal work hours for example. The proposed change adds the specific examples of “off-hours” into the clarifying instructions, which is aligned to the intent of the associated regulation and the Emergency Plan. The proposed changes provide an enhancement to the document by giving explicit examples of the time frame for meeting the requirement. Periodic exercises continue to be conducted to evaluate major portions of emergency response capabilities, to develop and maintain key skills, and to identify and correct deficiencies. With the proposed changes, a drill and exercise program (including radiological, medical, health physics and other program areas) remains established.

The proposed changes do not reduce the effectiveness of the Duke Energy Common Emergency Plan or site annexes. These changes continue to provide assurance that the Emergency Response Organization 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.

These changes continue to meet NRC requirements, as described in 10 CFR 50.47(b) and 10 CFR 50, Appendix E as well as the requirements of the Duke Energy Site’s Emergency Plans as written and approved.

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 ■ No ☐
2. Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)?	Yes ■ No ☐
3. Does the proposed change maintain the current Emergency Action Level (EAL) scheme?	Yes ■ No ☐
Section XII: Conclusion	
Questions 1, 2 and 3 are answered YES, complete step below to create a General NAS assignment, and then continue on to ***Section XIV*** and implement change(s).	■
General NAS assignment created - Licensing submit changes in accordance with 10 CFR 50.4(b)(5)(ii) within 30 days of change implementation	■
Questions 1 or 2 or 3 are answered NO, complete ***Sections XIII*** and ***Section XIV***.	☐

Section XIII: Disposition of Proposed Change Requiring Prior NRC Approval

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

Will the proposed change be submitted to the NRC for prior approval? If No, reject the proposed change, or modify the proposed change and perform a new evaluation. Continue to ***Section XIV*** for this evaluation.	Yes ☐ No ☐
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.***	

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): Ryan Bobek	Preparer Signature: See NAS	Date: See NAS
Reviewer Name (Print): Matthew Nelson	Reviewer Signature: See NAS	Date: See NAS
Approver Name (Print): T. Eric White	Approver Signature: See NAS	Date: See NAS
Approver (EP CFAM, as required) Name (Print): N/A	Approver Signature: N/A	Date: N/A

QA RECORD