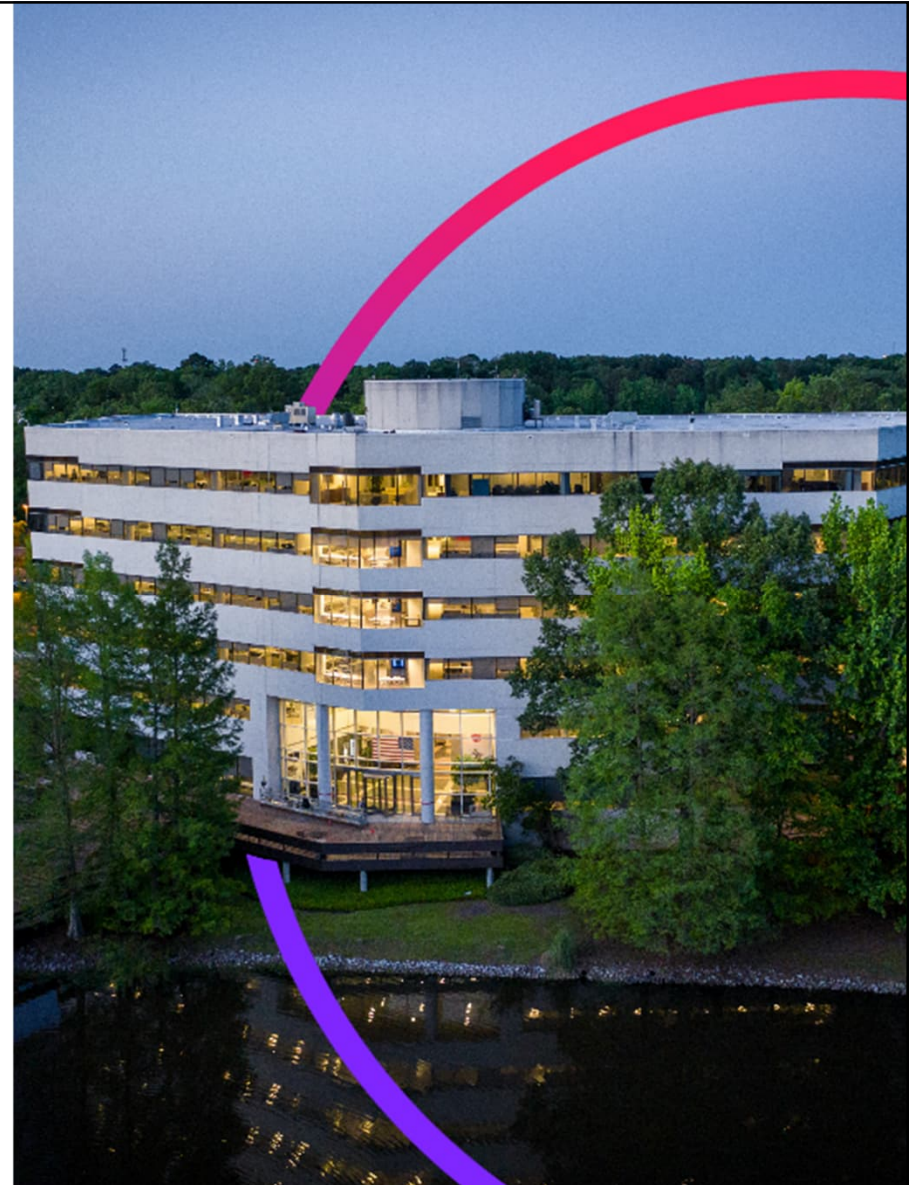




Pre-submittal Meeting:

Proposed Changes to Emergency Plan Staffing Requirements (Table B-1) for Entergy Fleet

May 6, 2026



Purpose of the Request

Seeking NRC approval of Emergency Plan changes requiring prior review under:

- 10 CFR 50.90
- 10 CFR 50.54(q)

Align Emergency Response Organization (ERO) Table B-1 staffing with NUREG-0654/FEMA-REP-1, Revision 2

Standardize augmentation times across Entergy fleet

Incorporate allowance for some ERO positions to be remote responders

Regulatory Basis

- 10 CFR 50.47, Emergency Plans
- 10 CFR 50 Appendix E – Emergency Planning & Preparedness for Production and Utilization Facilities
- Regulatory Guide 1.101, Revision 7 - Emergency Response Planning and Preparedness for Nuclear Power Reactors

Key Drivers for Changes

Fleet-wide standardization

Technological advancements in:

- Plant computer systems & Safety Parameter Display System (SPDS)
- Radiological assessment tools (Unified Rascal Interface (URI))
- Radiation Protection (RP) technology (electronic dosimetry, automated access control)

Increased pool of qualified responders (remote Technical Support Center (TSC) engineers)

Summary of Proposed Changes

Across all sites:

- Allow a larger pool of candidate to fill the on-shift dose assessment requirement
- Standardize EOF/TSC/OSC response times across the fleet to a 90-minute response time
- Convert on-shift chemist to 90-minute Operations Support Center (OSC) augmented role
- Remove on-shift repair team functions (Alignment with NUREG-0654 Rev. 2)
- Align RP staffing with NUREG-0654 Rev. 2
- Allow remote response for TSC engineers (Electrical/I&C, Mechanical, Reactor Engineering)
- Reduce some minimum ERO positions based on modern tools and capabilities

Summary of Proposed Changes

Engineering Staffing Revisions

- TSC engineering augmentation (Electrical/I&C, Mechanical, Reactor Engineering):
 - Remote response allowed
- Collateral duty Shift Technical Advisor (STA) covers engineering functions until augmentation
- Supported by NEI White Paper: Enabling Remote Response by Members of an ERO

Summary of Proposed Changes

Radiation Protection (RP) Revisions

- Reduce augmented RP personnel to 6 ANSI qualified
- Response time standardized to 90 minutes

Maintenance/Repair Team Changes

- Remove on-shift mechanical, electrical, and I&C roles from Emergency Plan
- Augmented maintenance responders standardized to 90 minutes

Summary of Proposed Changes

Dose Assessment Changes

- Dose assessment relocated from chemist to trained on-shift personnel
- Supported by:
 - Rapid dose assessment tools
 - Streamlined data access via URI
- No time-critical chemistry samples required in the first 90 minutes (per On-Shift Staffing Analysis (OSA))
- Augmented dose assessor moved from 60/75 to 90 minutes

Summary of Proposed Changes

Fleetwide Comparison of Key Emergency Plan Staffing Elements

Topic	ANO 1 & 2	Grand Gulf (GGNS)	River Bend (RBS)	Waterford 3 (WF3)
On-Shift Dose Assessment	Moved from chemist → qualified on-shift personnel	Same – moved to qualified on-shift personnel	Same – moved to qualified on-shift personnel	No change
On-Shift Chemist	Changed to 90-min OSC augmentation	Changed to 90-min OSC augmentation	Changed to 90-min OSC augmentation	Changed to 90-min OSC augmentation
Radiation Protection (RP) On-Shift	2 ANSI-qualified RP technicians	2 ANSI-qualified RP technicians	2 ANSI-qualified RP technicians	2 ANSI-qualified RP technicians (task-qualified removed; ANSI now required)
RP Augmentation	Changed to 6 ANSI-qualified @ 90 min	Changed to 6 ANSI-qualified @ 90 min	Changed to 6 ANSI-qualified @ 90 min	Changed to 6 ANSI-qualified @ 90 min
On-Shift Repair Team	Removed (aligns with NUREG-0654 Rev. 2)	Removed	Removed	Removed
Maintenance Augmentation (Mech, Elec, I&C)	All positions @ 90 min	All positions @ 90 min (some from 75 → 90)	All positions @ 90 min	All positions @ 90 min (was 75 → 90)
EOF / TSC / OSC	All positions @ 90 min	All positions @ 90 min	All positions @ 90 min	All positions @ 90 min
TSC Engineers (Elec/Mech/I&C/Reactor Eng.)	Remote response allowed; 90 min	Remote response allowed; 90 min	Remote response allowed; 90 min	Remote response allowed; 90 min
Exceptions / Deviations	Multiple deviations to 90-min RP & maintenance justified by tech improvements & OSA	Deviations from 75 → 90 min for some EOF/TSC roles	Deviations from 75 → 90 min for FMT and other	

Justification Summary

Technological advancements reduce reliance on staffing

RP and Engineering capabilities significantly improved

NRC endorsed remote responder model

On-shift staff remain capable of performing essential functions until augmented personnel arrive

Precedent

Exelon Generation Company - ML19078A018

Arizona Public Service Company - ML20163A037

Duke Energy Corporation - ML21155A213

Southern Nuclear – ML21217A021 / ML21217A091

Timeline for Submittal

Expected submittal in 3rd Quarter 2026

Request 1-year NRC review

Closing Remarks / Discussion