



November 12, 2019

NG-19-0131  
10 CFR 50.54(q)  
10 CRF 72.44(f)

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Duane Arnold Energy Center  
Docket No. 50-331  
Renewed Op. License No. DPR-49

Revision to Duane Arnold Energy Center (DAEC) Emergency Plan Sections A, B, E, F, H, I and M

NextEra Energy Duane Arnold, LLC issued revisions to the DAEC's Emergency Plan Sections A, B, E, F, H, I and M on 10/29/19. These revisions incorporated changes that do not reduce the effectiveness of the DAEC Emergency Plan. Pursuant to 10 CFR 50.54(q)(5) and 10 CFR 72.44(f), enclosed are the 50.54(q) Screening and Evaluation forms which provide a summary of the changes and analysis.

This letter contains no new commitments and no revisions to existing commitments.

If you have any questions or require additional information, please contact Mike Davis, Licensing & Emergency Preparedness Manager at (319) 851-7032.

A handwritten signature in black ink, appearing to read "Dean Curtland".

Dean Curtland  
Site Director, Duane Arnold Energy Center  
NextEra Energy Duane Arnold, LLC

Enclosure

cc: Director, Division of Spent Fuel Management  
Administrator, Region III, USNRC  
Resident Inspector, DAEC, USNRC

Enclosure to NG-19-0131

Duane Arnold Energy Center  
50.54(q) Screening and Evaluation Forms

13 Pages Follow

## 10CFR50.54(q) SCREENING FORM

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### SECTION 1: STATION APPLICABILITY

Applicable activity for review (process, document, modification, etc):

Applicable Site:  Duane Arnold Energy Center     Point Beach     Seabrook     St. Lucie     Turkey Point

### SECTION 2: PURPOSE

Identify the reason for the screening:

- 10CFR50.54(q) screening of a Change to the Emergency Plan or procedures implementing the Plan  
 Emergency Preparedness Function Assessment

### SECTION 3: PROVIDE A BRIEF DESCRIPTION OF PROPOSED CHANGE AND LIST THE PROCESS/DOCUMENT THAT IS DRIVING THE CHANGE.

#### Procedure Number and Current Revision:

The following procedures and forms will be affected by this change (current revisions as of 10-16-2019):

Procedure / Current Rev.	Procedure / Current Rev.	Procedure / Current Rev.	Procedure / Current Rev.
DAEC Plan "A" / 25	EPIP Index / 193	EPIP 3.3 / 36	EPIP Form EOF-09 / 11
DAEC Plan "B" / 43	DAEC Plan Appendix 6 / 30	EPIP 5.2 / 12	EPIP Form EOF-16 / 11
DAEC Plan "E" / 25	EPIP 1.1 / 31	EPIP Form EOF-02 / 10	EPIP Form EOF-18 / 7
DAEC Plan "F" / 29	EPIP 1.2 / 52	EPIP Form EOF-03 / 15	EPIP Form EOF-32 / 8
DAEC Plan "H" / 37	EPIP 1.5 / 19	EPIP Form EOF-05 / 17	EPIP Form EOF-38 / 23
DAEC Plan "I" / 28	EPIP 2.3 / 11	EPIP Form EOF-07 / 22	EPIP Form ERO-01 / 10
DAEC Plan "M" / 21	EPIP 3.1 / 31	EPIP Form EOF-08 / 19	EPIP Form TSC-03 / 23

**Process/Document Driving Change:** Transfer of the tasks of the Radiological & EOF Manager tasks and responsibilities to the EOF Operations Liaison and the Radiological Assessment Coordinator and eliminate the Radiological & EOF Manager position. CMP 2326592 directs this change.

**Brief Description (include why the change is being made):** This change is being made to transfer and divide tasks and responsibilities from the Radiological and EOF Manager (Rad & EOF Manager) to the Radiological Assessment Coordinator (RAC) and EOF Operations Liaison to allow elimination of the Rad & EOF Manager. The main functions that the Radiological and EOF Manager provided is for the following:

- Communication of emergency information to the Offsite Response Organizations (OROs) including protective action recommendations to the Emergency Response and Recovery Director (ERRD)
- Coordination and direction of all onsite and offsite radiological monitoring and dose assessment programs, communicating with the TSC as necessary
- Supervising activities within the EOF and interpreting radiological data for updating the ER&RD, county, state, federal and support agencies in terms of projected radiological exposures and actual dose measurements.

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- Providing for radiological protection for those personnel at the EOF.
- Public Health and Protective response
- Analyzing trends and providing updated information to the OROs of changing radiological conditions that could impact the public
- Providing assistance to the county, state and federal officials for recovery activities
- Advising the ER&RD to ensure compliance with legal and regulatory requirements.

When this change is put in place, the communication function to the OROs for emergency event notification information such as EAL declaration and PARs will be performed by the EOF Operations Liaison and any radiological oversight, analysis and communication to the OROs that was previously performed by the Rad & EOF Manager will now be performed by the RAC. Additionally, the RAC will now take over the responsibilities for recovery actions that were previously performed by the Rad & EOF Manager. A task and responsibility review was performed and is the basis for these changes.

Check if EAL Validation & Verification is Attached (required for EAL change not in the NRC SER)

**SECTION 4: DETAILED DESCRIPTION OF ACTIVITY BEING REVIEWED.** The "activity" is an 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.

Change Number	Description of Change	Reason for Change	Screening	Planning Standard / Program Element *
1.	The Radiological & EOF Manager position tasks and responsibilities are being transferred to the EOF Operations Liaison and the Radiological Assessment Coordinator (RAC). This will allow the Rad & EOF Manager position to be eliminated. The Rad & EOF Manager's responsibilities at the EOF included performing offsite notifications to the Offsite Response Organizations (OROs) in addition to informing the OROs of any changing radiological conditions. Additionally, the Rad & EOF Manager provides oversight and direction in conjunction with the RAC for any radiological conditions that may occur during an event. Finally, the change will transfer the Rad EOF Manager responsibility for assisting in recovery efforts to the RAC. This change will amend the Eplan, EPIP and EPIP forms that are listed above in order to provide the direction and to transfer the responsibilities of radiological condition oversight and direction to the RAC and the responsibility of offsite notifications of the emergency declaration / PARs to the OROs to the EOF Ops Liaison.	Transfer of position tasks and responsibilities to the RAC and the EOF Operations Liaison. This will allow elimination of the Rad & EOF Manager position.	<input type="checkbox"/> Editorial Change: Analysis is NOT required  <input type="checkbox"/> Proposed change does NOT affect the Planning Standards /Program Elements: Analysis is NOT required  <input checked="" type="checkbox"/> Proposed change DOES affect the Planning Standards / Program Elements: Analysis IS required	<b>10 CFR 50.47:</b> (b)(1) (b)(2) (b)(5) (b)(9) (b)(10)  <b>10 CFR 50 Appendix E:</b> IV (A)(1) IV (A)(2)(a) IV (A)(4) IV (B)(1) IV (D)(1)

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\* Planning Standard / Program Element from Section 7

**SECTION 5: RESULTS OF SCREENING**

- If NO Section 7 criteria are affected, a 10CFR50.54(q) Evaluation is NOT required.
- If ANY Section 7 criteria are affected, go to Form 2 to perform a 10CFR50.54(q) Evaluation.

**SECTION 6: SIGNATURE**

Prepared by (Print Name) Mark Fritz	Signature 	Date 10-21-19
Reviewed by (Print Name) <del>Bob Murrett</del> Rebecca Palmer	Signature 	Date 10/20/19
SFAM Approval (Print Name) Mike Davis	Signature 	Date 10/22/19
CFAM Approval (Print Name) Electronic Signature	Signature in NAMS by Denny Smith, PB	Date 7 10-22-19 →

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**Section 7: Are any of the following affected by this change? (Document in Section 4 for each change.)**

No.	Planning Standards / Functions	Requirement	YES	NO
1.	Responsibility for emergency response is assigned..	50.47(b)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.	The response organization has the staff to respond and to augment staff on a continuing basis (i.e., 24/7 support) in accordance with the emergency plan.	50.47(b)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.	The process ensures that onshift emergency response responsibilities are staffed and assigned (including on-shift staffing study and assumptions)	50.47(b)(2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.	The process for timely augmentation of onshift staff is established and maintained.	50.47(b)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.	Arrangements for requesting and using offsite assistance have been made.	50.47(b)(3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.	State and local staff can be accommodated at the EOF in accordance with the emergency plan.	50.47(b)(3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7.	A standard scheme of emergency classification and action levels is in use.	50.47(b)(4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.	Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes after declaration of an emergency and providing follow-up notifications.	50.47(b)(5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9.	Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10.	The public ANS meets the design requirements of FEMA-REP-10, "Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants", or is compliant with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter.	50.47(b)(5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11.	Systems are established for prompt communication among principal emergency response organizations.	50.47(b)(6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12.	Systems are established for prompt communication to emergency response personnel.	50.47(b)(6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13.	Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway EPZ.	50.47(b)(7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14.	Coordinated dissemination of public information during emergencies is established.	50.47(b)(7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15.	Adequate equipment & facilities are maintained to support emergency response.	50.47(b)(8)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16.	Methods, systems, and equipment for assessment of radioactive releases are in use	50.47(b)(9)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17.	A range of public PARs is available for implementation during emergencies.	50.47(b)(10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18.	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.	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
19.	A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events	50.47(b)(10)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20.	The resources for controlling radiological exposures for emergency workers are established.	50.47(b)(11)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
21.	Arrangements are made for medical services for contaminated, injured individuals	50.47(b)(12)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
22.	Plans for recovery and reentry are developed.	50.47(b)(13)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
23.	A drill and exercise program (including radiological, medical, health physics, and other program areas) is established.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
24.	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.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
25.	Identified weaknesses are corrected.	50.47(b)(14)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
26.	Training is provided to emergency responders.	50.47(b)(15)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
27.	Responsibility for emergency plan development and review is established.	50.47(b)(16)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
28.	Planners responsible for emergency plan development and maintenance are properly trained.	50.47(b)(16)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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**SECTION 1: THE CHANGE NUMBER(S) IDENTIFIED IN SECTION 4 OF THE SCREENING FORM THAT IS BEING EVALUATED**

**Change 1**

The Radiological & EOF Manager position tasks and responsibilities are being transferred to the EOF Operations Liaison and the Radiological Assessment Coordinator (RAC). This will allow the Rad & EOF Manager position to be eliminated. The Rad & EOF Manager's responsibilities at the EOF include protective action recommendations to protect the public, performing offsite notifications to the Offsite Response Organizations (OROs) in addition to informing the OROs of any changing radiological conditions and keeping them aware of the event. Additionally, the Rad & EOF Manager provides oversight and direction in conjunction with the RAC and SPRC for any radiological conditions that may occur during an event. Finally, the change will transfer the Rad EOF Manager responsibility for assisting in recovery efforts to the RAC. This change will amend the E-plan, EPIP and EPIP forms that are listed in the screening form in order to transfer the responsibilities and tasks of radiological condition oversight, protective action recommendation responsibility, ORO updates during and event and strategy and direction for any radiological condition to the RAC and the responsibility of offsite notifications of the emergency declaration / PARs to the OROs to the EOF Ops Liaison.

**SECTION 2: LIST EACH OF THE EMERGENCY PLANNING FUNCTION(S) AFFECTED BY THIS PROPOSED CHANGE**

**10 CFR 50.47 (b)(1) *Assignment of Responsibility / Organizational Control***

Two emergency planning functions have been defined for this planning standard and both relate to the proposed change:

- (1) Responsibility for emergency response is assigned.
- (2) The response organization has the staff to respond and to augment staff on a continuing basis (i.e., 24/7 support) in accordance with the emergency plan.

**10 CFR 50.47(b)(2) *Onsite Emergency Organization***

Two emergency planning functions have been defined for this planning standard and one relates to the proposed change:

- (2) The process for timely augmentation of on-shift staff is established and maintained.

**10 CFR 50.47(b)(5)—*Emergency Notifications***

Three emergency planning functions have been defined for this planning standard and one relates to this change:

- (1) Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes after declaration of an emergency and providing follow-up notifications.

**10 CFR 50.47(b)(9)—*Emergency Assessment Capability***

The following emergency planning function has been defined for this planning standard which relates to this change:

Methods, systems, and equipment for assessment of radioactive releases are in use.

**10 CFR 50.47(b)(10)—*Emergency Protective Actions***

Three emergency planning functions have been defined for this planning standard and one relates to this change:

- (3) A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.

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**10 CFR Part 50, Appendix E, Section IV (A) - Organization**

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:

1. A description of the normal plant operating organization.
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
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

**10 CFR Part 50, Appendix E, Section IV (B) – Assessment Actions**

1. The means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety

**10 CFR Part 50, Appendix E, Section IV D. Notification Procedures**

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.

**SECTION 3: LIST THE NRC REGULATORY GUIDANCE DOCUMENTS, NRC GENERIC COMMUNICATIONS SUCH AS ADMINISTRATIVE LETTERS, BULLETINS, GENERIC LETTERS, INFORMATION NOTICES AND REGULATORY ISSUE SUMMARIES. ADDITIONALLY LIST SITE COMMITMENTS AS A RESULT OF ITEMS SUCH AS NRC INSPECTION FINDINGS, SAFETY EVALUATIONS, ATOMIC SAFETY LICENSING BOARD.**

**Regulatory Guide 1.219, Rev. 1 *Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors***

**10 CFR 50.47(b)(1) Assignment of Responsibility/Organizational Control**

- a. The regulation at 10 CFR 50.47(b)(1) states the following:  
"Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis."
- c. Sections IV.A.1–IV.A.9 of Appendix E to 10 CFR Part 50 provide supporting requirements. Informing criteria appear in Section II.A of NUREG-0654 and the licensee's emergency plan.



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The following are examples of changes to the licensee's emergency plan that could require prior NRC approval:

(1) A change could require prior NRC approval if it would reduce the authority and responsibility of persons filling key positions to perform their emergency assignments in accordance with the emergency plan.

(2) A change could require prior NRC approval if it assigns major functional areas or major tasks to two or more onsite organizations simultaneously such that it would not be clear to ERO members and the OROs which organization has the authority and responsibility for the activity at any point in the response. An example of this type of change could be one in which the TSC and EOF would perform dose projection functions concurrently without assigned hierarchical responsibility.

**10 CFR 50.47(b)(2) Onsite Emergency Organization**

- a. The regulation at 10 CFR 50.47(b)(2) states the following: [Onshift] "... 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."
- c. Sections IV.A and IV.C of Appendix E to 10 CFR Part 50 provide supporting requirements. Informing criteria appear in Section II.B of NUREG-0654 and the licensee's emergency plan. Changes to the ERO have the potential to affect its performance in the major functional areas and major tasks, and evaluations of the effect of such changes would necessarily involve other emergency planning functions. The following are examples of changes to the licensee's emergency plan that could require prior NRC approval:
  - 1. A change could require prior NRC approval if it would cause any of the major functional areas or major tasks identified in the emergency plan to be unassigned. An example of this type of change would be replacing qualified radiation protection technicians with other personnel who do not have the requisite qualification to offer radiation protection coverage to personnel other than themselves (e.g., coverage for an offsite fire department responding onsite).
  - 2. A change could require prior NRC approval if it eliminates key positions identified in the plan and reassigns the responsibilities of the eliminated positions to other key positions (e.g., multiple functions) and if it would result in an ERO member being assigned duties that could be expected to be performed concurrently rather than sequentially. An example of this type of change would be one in which control room communicator responsibilities are assigned to a fire brigade member or one in which dose assessment responsibilities are assigned to a shift technical advisor.

**10 CFR 50.47(b)(5)—Emergency Notifications**

- a. The regulation at 10 CFR 50.47(b)(5) states the following: "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 followup 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."
- c. Sections IV.D.1 and IV.D.3 of Appendix E to 10 CFR Part 50 provide supporting requirements. Informing criteria appear in Section II.E and Appendix 3 to NUREG-0654 and the FEMA-approved ANS design report. The following are examples of changes to the licensee's emergency plan that could require prior NRC approval:

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1. A change could require prior NRC approval if it would reduce the licensee's capability to promptly alert responsible OROs of the declared emergency within 15 minutes after declaring an emergency. Examples include the following:

(a) a change to the notification process that reduces the accuracy or timeliness of emergency notifications;

(e) a change to ERO staffing that affects the timeliness of emergency notifications by assigning collateral duties to the ERO positions that are responsible for performing emergency notifications.

**10 CFR 50.47(b)(9)—Emergency Assessment Capability**

- a. The regulation at 10 CFR 50.47(b)(9) states the following: "Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use."
- c. Sections IV.B and IV.E.2 of Appendix E to 10 CFR Part 50 provide supporting requirements. Informing criteria appear in Section II.I of NUREG-0654 and the licensee's emergency plan. The following are examples of changes to the licensee's emergency plan that could require prior NRC approval:

1. A change could require prior NRC approval if it would reduce the capability of the ERO to assess imminent and ongoing radioactive releases in accordance with the emergency plan. Examples include the following:

(c) the reassignment of dose assessment responsibilities from a site-specific EOF member to a common EOF manned with ERO personnel who are not sufficiently competent in the site's radiation monitoring systems, ventilation systems, source terms, or potential release paths to perform a credible dose assessment;

**10 CFR 50.47(b)(10)—Emergency Protective Actions**

- a. The regulation at 10 CFR 50.47(b)(10) states the following: "A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. Evacuation time estimates have been developed by applicants and licensees. Licensees shall update the evacuation time estimates on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed."
- c. Appendix E to 10 CFR Part 50 does not contain any support requirements. Informing criteria appear in NUREG-0654 in Sections II.J.1–8, Section II.J.10, and Supplement 3 and in the licensee's emergency plan. The following are examples of changes to the licensee's emergency plan that could require prior NRC approval:

1. A change could require prior NRC approval if it would reduce the capability of the ERO to carry out timely and appropriate protective actions for onsite employees and other individuals present in the plant areas controlled by the licensee and to make timely and appropriate PARs to State and local officials in accordance with the emergency plans.

**Safety Evaluation**

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3.2.3 Notification/Communications (pertinent excerpts)

The licensee states that DAEC will have an on-shift dedicated communicator and the TSC will have the operations liaison and NRC emergency notification systems communicator respond to the TSC within 60 minutes of an Alert declaration or higher, while the EOF will have the EOF/Operations Liaison and Rad & EOF Manager respond to the EOF within 60 minutes of a Site Area Emergency declaration or higher. The proposed changes would increase the response times for the 30 minutes' responders in the Notifications/Communications area to 60 minutes. This major functional area identifies the on-shift communicator to be a dedicated on-shift ERO position. The licensee proposed many changes to this figure, particularly in order to delineate which ERO positions are considered minimum staff. While some of these changes were not specifically discussed in the licensee's application and supplemental letters, the NRC staff has determined that the changes are an acceptable approach to meeting the intent of the guidance and to maintaining compliance with the regulations.

3.2.4 Radiological Accident Assessment and Support of Operational Assessment/Protective Actions (In-Plant) (pertinent excerpts)

The function of onsite radiological assessment is to: review radiological conditions onsite using data from available instrumentation; assess the impact of changing radiological conditions on emergency classification; assist in accident assessment based upon those changing radiological conditions, and recommend appropriate onsite protective measures. This major functional area includes the following tasks:

Offsite Dose Assessment and PARs: The guidance in NUREG-0654, Table 8-1 identifies one person to perform the offsite dose assessment function as a 30-minute augmented position.

The licensee states that the radiological assessment coordinator and MIDAS operator in the EOF are also tasked with offsite dose assessment and PARs. These positions respond within 60 minutes of a Site Area Emergency declaration or higher. This is not an actual change to the DAEC Emergency Plan, just an enhancement to Table 8-1.

Based on the licensee's current dose assessment capability and the use of a dedicated on-shift position to perform dose assessment, the NRC staff concludes that there is no loss of function or impact on the timing for performing dose assessment. Therefore, with the proposed changes, the DAEC Emergency Plan continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

*Table B-1, "On-Shift Staffing & Staff Augmentation Assignments":*

The licensee proposed many changes to this table to clarify timing changes, as evaluated above, and to better delineate ERO position titles (or expertise) and the applicable response locations. An evaluation of the impact of these changes on DAEC Emergency Plan major functional areas was performed and is documented in 3.2 above.

*Figure B-1, "On-Site Emergency Response Organization":*

The licensee proposed many changes to this figure, particularly in order to delineate which ERO positions are considered minimum staff. While some of these changes were not specifically discussed in the licensee's application and supplemental letters, the NRC staff has determined that the changes are an acceptable approach to

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**SECTION 4: DESCRIBE HOW THE PROPOSED CHANGE TO THE EMERGENCY PLAN COMPLIES WITH THE (1) FUNCTION AND (2) TIMING OF THE FUNCTION FOR THE ITEMS DESCRIBED IN SECTION 2 AND 3**

**Background**

The changes to the DAEC Emergency Plan and the associated EIPs are designed to transfer the roles and responsibilities of the Rad & EOF Manager to the Radiological Assessment Coordinator (RAC) and the EOF Operations Liaison. The transfer of tasks, when completed, will allow the Rad & EOF Manager position to be eliminated.

The Rad & EOF Manager maintains their ERO role at the Emergency Operations Facility (EOF) and is responsible for coordinating and providing oversight and direction to personnel such as the Field Team Director, RAC and MIDAS Operator who may be involved in a radiological event if it were to occur. Coordination and development of mitigating strategies for radiological events is performed between both the Site Radiation Protection Coordinator (SRPC) at the TSC and the Rad EOF Manager at the EOF when radiological events are in progress. Additionally, the Rad & EOF Manager performs in the role of communicator to the Offsite Response Agencies (OROs) when a need for transmission of emergency event information such as EALs or PARs exists. During an event, the Rad & EOF Manager provides periodic updates to the Emergency Response and Recovery Director (ERRD) at the EOF as well as updating the OROs when changes in the event occur. The Rad & EOF Manager does many of the functions of radiological monitoring and analysis in conjunction with the RAC and many tasks pertaining to both jobs overlap which is the reasoning for the consolidation and transfer of tasks to both the RAC and the EOF Ops Liaison. When the transfer of responsibilities and tasks is complete, the emergency notification offsite communication will be performed by the EOF Ops Liaison while the coordination and development of mitigating strategies for radiological events will be performed by the RAC.

**Function and Timing**

**Function:** 10 CFR 50.47 (b)(1) *Assignment of Responsibility / Organizational Control*

Key Positions

As reflected in the changes to the DAEC Emergency Plan Section B, *Emergency Response Organization, Table B-1, On-Shift Staffing & Staff Augmentation Assignments* and the changes to Figure B-1, *Emergency Response Organization*, the Rad & EOF Manager is no longer listed under the Notification / Communication function. Previously, this ERO role was responsible for transmitting the emergency information to the offsite agencies after direction from the ERRD. The notification and communication function included transmission of EAL and PAR information to the OROs. This responsibility as listed in the Table B-1 is also with the EOF Ops Liaison. Current practice is that the EOF Ops Liaison will gather the information and complete the emergency notification form for approval by the ERRD. A review is performed among the EOF Ops Liaison, Rad & EOF Manager and the ERRD before the notification is approved and direction is given to the Rad & EOF Manager to perform offsite notification. The EOF Ops Liaison will now be given the order by the ERRD to perform this notification. The EOF Ops Liaison has no other E-Plan responsibilities during this time other than notifications and communications. The change to allow the EOF Ops Liaison to perform the call to the OROs is in line with the emergency plan currently. The removal of the Rad & EOF Manager as a phone talker on that call will not affect the function and timing of notification and communication per the E-plan.

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The changes to the responsibilities of the RAC as indicated in DAEC Plan "B" will now require this ERO position to be responsible for the coordinating and directing of all offsite radiological monitoring and dose assessment programs and supervising activities within the EOF. The RAC will maintain accountability to the ERRD. Currently, the RAC does provide oversight of the MIDAS Operator and Field Team Director while maintaining coordination efforts for radiological events with the SRPC at the TSC. The elimination of the Rad & EOF Manager will not increase the duties of the RAC for dose assessment and Field team direction as this ERO position is already performing those tasks. Additionally, the RAC currently has the responsibility for developing PARs based upon dose projections or Field Team results. That responsibility will be the same when the elimination of the Rad & EOF Manager is complete as many of the RAC tasks directed this position to work with the Rad & EOF Manager to complete.

The RAC is considered a minimum staff for activation of the EOF. This position is a 60 minute responder required to man the ERO position within 60 minutes following a Site Area Emergency declaration. There are no additional time constraints from the elimination of the Rad & EOF Manager position which provides us the indication that the timing of the augmentation of the ERO at the EOF by the RAC will be maintained. The responsibilities of radiological assessment and strategies and the ability of the EOF to activate in the required timeframe is maintained with this change.

### Function: 10 CFR 50.47(b)(2) Onsite Emergency Organization – Timely Augmentation

#### ERO Augmentation

At an alert declaration, site procedures require ERO personnel to transit to their respective ERO facilities. The EOF is not required to be activated at this time. However, guidance is available to utilize the EOF resource if necessary. The requirement to activate the EOF is within 60 minutes following the declaration of a Site Area Emergency.

When the EOF is required to be activated, the RAC and EOF Ops Liaison are required to respond within that 60 minutes timeframe. This is not a change from current requirements. Both of these positions are considered minimum staffing for the EOF. The elimination of the Rad & EOF Manager does not affect the function and timing of timely augmentation and at the EOF as the duties and responsibilities of the Rad & EOF Manager are transferred to the RAC and EOF Ops Liaison and the timing has not changed.

### Function: 10 CFR 50.47(b)(5) Emergency Notifications

#### Notification / Communication

Per the current DAEC emergency plan "B" Table B-1, the EOF Ops Liaison and the Rad & EOF Manager are able to perform the Notification / Communication function. Current practice for this function includes the obtaining of data and completion of the emergency notification form by the EOF Ops Liaison. A review of this form is performed by the ERRD, Rad & EOF Manager and the EOF Ops Liaison which upon approval is signed by the ERRD. The direction is then given to the Rad & EOF Manager to perform offsite notifications. With this change, the emergency notification function will be maintained as the EOF Ops Liaison, who is currently listed for this function, will complete the entire notification vice the Rad & EOF Manager as phone talker. During this timeframe, the EOF Ops Liaison has no other required Eplan functions other than notification and communication. Requiring the EOF Ops Liaison to complete the entire notification will not affect the timeliness of this function as they are already involved with the process from the beginning. No effect on the function and timeliness.

### Function: 10 CFR 50.47(b)(9) Emergency Assessment Capability

#### Dose Assessment

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This change will include the RAC as the oversight and supervision of any radiological event that may occur. The method for Dose Assessment will still utilize the MIDAS program and the Field Team direction is still performed by the Field Team Directors. Protective action recommendation will be performed by the RAC and the analysis of the dose assessment results via MIDAS are reviewed by the RAC as they currently do now. There is no effect on the assessment capability due to elimination of the Rad & EOF Manager as the dose assessment program is the same, the people who operate the dose assessment software is the same and the person who is directing the field teams is the same. The RAC previously had responsibilities to provide oversight and direction to both the MIDAS Operator and the Field Team Director. That responsibility does not change with this change. The RAC will now be responsible for updating the ERRD and offsite agencies of any changing radiological conditions that are identified. The timing of this function does not change as the dose assessment results will be analyzed by the RAC which is consistent with previous requirements. No effect on the function and timing of Dose Assessment.

**Function: 10 CFR 50.47(b)(10) Emergency Protective Actions**

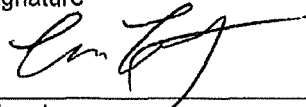

Protective Actions

Protective actions are determined in accordance with EPIP 3.3, Dose Assessment and Protective Action. The decision for protective actions are informed by the use of the PAR-01 flowchart and data received from dose assessment, field team data and emergency action level classification. The protective actions will continue to be determined by the RAC as in previous requirements. The change only removed the Rad & EOF Manager from the process due to position elimination. Both the Rad & EOF Manager and the RAC had shared responsibility for the development of the protective actions per EPIP 3.3. This change with elimination of the Rad & EOF Manager will not affect the protective action development process as this was previously done with the assistance of the RAC. The RAC will now perform this development of PARs and inform the ERRD when required. The timing of development of protective actions is the same as before as the RAC is a minimum staffing complement of the EOF and is required to report within 60 minutes of a Site Area Emergency. Since the RAC has previously been co-responsible for the development of PARs, there is no effect on the function of protective actions and no effect on the timing.

**SECTION 5: RESULTS OF EVALUATION: ANSWER THE FOLLOWING QUESTIONS BASED ON THE EVALUATION**

1. Does the proposed change comply with 10CFR50.47(b) and 10CFR50 Appendix E?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Does the proposed change maintain the emergency plan with no reduction in effectiveness?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<input checked="" type="checkbox"/>	The answer to BOTH question 1 & 2 are YES. The proposed change may be implemented without prior NRC approval.
<input type="checkbox"/>	The answer to EITHER question 1 or 2 is NO. Prior approval by the NRC is required prior to implementation.

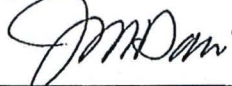
**SECTION 7: SIGNATURE**

Prepared by (Print Name) Mark Fritz	Signature 	Date 10-21-19
Reviewed by (Print Name) Rebecca Palmer	Signature 	Date 10-22-19

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SFAM Approval (Print Name)	Signature	Date
Mike Davis		10/22/19
CFAM Approval (Print Name)	Signature	Date
Electronic Signature in NAMS by Denny Smith	_____	10-22-19

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Electronic Signature in NAMS by  
Denny Smith, PB

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10-22-19