

NRC/FEMA Rulemaking A State Perspective

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Additional Guidance Changes

- NUREG 0654/FEMA/REP-1
 - Modified Evaluation Criteria
 - Added Evaluation Criteria
- 44 CFR 350
 - HSEEP Policy and Guidance
 - Reasonable Assurance

Hostile Action Based Drills

- Inconsistency in Exercise Cycle
 - 8 Years (proposed HABD)
 - 6 Years (FEMA REP Program)
- Implications for states with one nuclear power plant site
- Implications for states with multiple nuclear power plant sites

Incorporation of Homeland Security Exercise Evaluation Program (HSEEP)

- Not reflected in proposed REP Manual
- Self evaluation
- Corrective Action Program
- After Action Reports
- Reasonable Assurance

Overly Prescriptive Criteria

- State, County and Local Legislative Mandates
- Unique local organizational structures
- Creative and adaptive local planning
- Acceptance Criteria for deviations