

## INES PARTICIPATION ALTERNATIVES

### **Alternative 1: Nonparticipation**

The NRC would discontinue its participation in the INES program. The advantages and disadvantages of nonparticipation in the INES program are summarized below.

#### Advantages

1. Nonparticipation would eliminate a program which, due to limited participation by the NRC, has been of marginal benefit to the worldwide media and public.
2. Nonparticipation would result in a slight savings of staff resources (i.e., less than 0.01 FTE).

#### Disadvantages

1. The United States supports the objectives of the INES and has participated in the development and implementation of the INES program, albeit in a limited fashion. However, nonparticipation in the INES program could be viewed unfavorably by the international community, and would give the United States little or no influence on the further development of this program.
2. The public and media of other participating countries may be confused about the significance of a U.S. event that has not been assigned an INES rating. As a result, additional staff time may be required to describe the event to the media and regulatory counterparts in other countries. Furthermore, the IAEA or another country may assign a rating for an event in the United States. For example, a February 20, 2000, event involving a stolen Co-60 source in Thailand was “unofficially” rated *level 4* by IAEA (“unofficially” because Thailand does not participate in the INES).
3. A decision by the NRC to discontinue participation in the INES program would likely draw criticism from the IAEA and our foreign regulatory counterparts.

### **Alternative 2: Limited Participation**

The NRC would maintain its current policy of limited participation. We would continue to submit an INES rating form only for events at power reactors which resulted in an Alert (or higher) declaration using the emergency classification system defined in NUREG-0654. These reports would continue to be submitted no sooner than 10 business days following the termination of the event. The advantages and disadvantages of limited participation are addressed below.

### Advantages

1. Limited participation ensures that information concerning a subset of significant events (reactor events classified at Alert or above) is consistently communicated to the international community.
2. Limited participation would not involve additional staff resources.

### Disadvantages

1. Maintaining the current limited participation policy could be viewed as a somewhat uncooperative stance by the international community, and could give the United States less influence on the further development and future uses of the INES.
2. Maintaining the current limited participation policy would deprive NRC of the potential benefits of expanded and full participation described below.

### **Alternative 3: Expanded Participation**

The NRC would revise its current level of participation to include the screening of all event reports received from power reactors for possible rating using the INES. NRR would use its existing events assessment process for this review. In accordance with guidance provided by the IAEA, only events rated at *level 2* or higher would be reported to the IAEA, unless another member country specifically requested the rating of a particular event. These reports would be submitted to the IAEA within two business days of notification to the NRC. Events which do not meet these criteria would not be recorded nor reported. Expanded participation in the INES would be transparent to reactor licensees as any data collection required for the rating would be done by NRC staff.

The INES incorporates the use of both “Provisional” and “Final” reports in order to promote prompt reporting of events by member countries. It is conceivable that during certain situations, such as prolonged emergency response to an event at a licensed facility, the staff might issue a preliminary report followed by a final report with a different numerical rating.

INES reports would no longer be submitted solely because an Alert or higher emergency classification was made. Based upon experience in rating events since the NRC began limited participation, the staff has not found any correlation between the declaration of a low level emergency at a power reactor facility and a subsequent INES rating of the event above the reporting threshold (*level 2*) to the IAEA.

### Advantages

1. Expanding participation could ultimately lead to improved international community awareness about the safety significance of all events at U.S. power reactors.
2. As a world leader, the United States would bring an important perspective to this issue and would set a precedent for improving communication throughout the world regarding matters of international nuclear safety.

### Disadvantages

1. Increasing the current level of participation could involve some, albeit small, additional burden on the staff. Note that this may actually be less than in previous years due to the declining number of reportable events. The burden would be distributed among staff (1) investigating and evaluating the reported events, (2) drafting reports, and (3) disseminating the ratings domestically and internationally.
2. Expanded participation could result in increased public attention to power reactor events because of increased international media coverage.

### **Alternative 4: Full Participation**

Previous Commission papers regarding staff participation in the INES defined “full participation” as mandating that NRC licensees rate events on the INES and promptly report the ratings. The staff had concluded that licensees could accurately report the facts and analyze events in a more timely manner. Since then, many of the countries participating in the INES program have decided that ratings are more appropriately assigned by governmental regulatory agencies. For the purposes of this discussion, “full participation” is defined as the evaluation of all nuclear events (reactor, fuel cycle, materials, and transportation events), including events which fall under the regulatory purview of the Agreement States, by the NRC staff for possible rating on the INES. Medical misadministrations are outside the scope of the INES and would not be reviewed by the staff for possible rating. This approach is consistent with the One Voice initiative described in COMSECY-00-0024 and subsequently approved by the Commission.

As with Alternative 3, only events rated at *level* 2 or higher would be reported to the IAEA, unless another member country specifically requested the rating of a particular event. These reports would be submitted within two business days of notification to the NRC. Events which do not meet these criteria would not be recorded nor reported.

### Advantages

1. Supports our Strategic Plan by enhancing the integration of international activities in the NRC.
2. The United States would become a full participant in the INES program in a manner consistent with other countries.
3. Full participation would maintain the United States in a primary position to influence the future use and development of the INES.
4. Full participation would allow the international stakeholders to quickly grasp the significance of U.S. events.

### Disadvantages

1. Increasing the current level of participation could involve some, albeit small, additional burden on the staff. Note that for NRR, this may actually be less than in previous years

due to the declining number of reportable events. The burden would be distributed among staff (1) investigating and evaluating the reported events, (2) drafting reports, and (3) disseminating the ratings domestically and internationally.

2. Full participation could result in increased public attention to certain nuclear materials events because lost and damaged devices and transportation events have the potential to be rated as *level 2* or higher on the INES.