



## NUCLEAR ENERGY INSTITUTE

Lynnette Hendricks  
DIRECTOR, LICENSING  
NUCLEAR GENERATION

September 24, 2002

Mr. Theodore R. Quay  
Chief, Radiation Safety and  
Emergency Preparedness Branch  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

SUBJECT: Industry Review, "Appendix B to NRC Inspection Manual Chapter 0609, Emergency Preparedness Significance Determination Process, August 26, 2001"

Dear Mr. Quay:

On September 12, 2002, the NEI Emergency Preparedness Significance Determination Process (SDP) Issue Task Force met with the NRC Emergency Preparedness Branch staff to review the enclosed industry recommendations for improving the SDP process used for ranking findings from emergency preparedness program inspections. The industry understands the importance of demonstrating the effectiveness of its emergency preparedness programs and is taking steps to ensure the appropriate amount of management attention is focused on emergency preparedness programs.

We also believe that the context in which findings are presented is important to retaining public confidence in the industry and NRC for emergency preparedness. The significance of EP findings needs to be presented in a context that is consistent with the significance of findings given the same ranking in other cornerstones of the reactor oversight program. The current version of the EP SDP is not only difficult for the regulator to apply with consistency, but has resulted in inappropriate outcomes when those outcomes were viewed in the context of risk significance across the reactor oversight process.

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We believe the enclosed comments will improve consistency. We propose that a larger project be considered that would bring together SDP specialists and the EP

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community with the objective of rebase lining the EP SDP. This project should be incorporated into the broader SDP Improvement Plan identified in SECY 02-0062. Such a project would ensure that the significance of Emergency Preparedness events is appropriately conveyed to the public.

The industry appreciates the efforts that your staff made over this past year to provide the industry with an opportunity to support revision of the Emergency Preparedness Significance Determination Process Guidance. If you have any questions please contact Alan Nelson at (202) 739-8110 or by e-mail ([apn@nei.org](mailto:apn@nei.org)).

Sincerely,



Lynnette Hendricks

Attachment