



NUCLEAR ENERGY INSTITUTE

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January 22, 2003

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

Attention: Document Control Center

Project: 689

SUBJECT: Methodology for Development of Emergency Action Levels,
Final NEI 99-01, Rev. 4, January 2003
Request NRC Endorsement

Dear Mr. Quay:

The NEI Emergency Action Level Issue Task Force has finalized "Methodology for Development of Emergency Action Levels," NEI 99-01, Revision 4, January 2003. This document presents the methodology for development of emergency action levels (EALs) as an alternative to NRC/FEMA guidelines contained in Appendix 1 of NUREG-0654/FEMA-REP-1, Rev. 2, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," October 1980 and 10 CFR 50.47 (a)(4). Revision 4 consolidates the system malfunction initiating conditions and example EALs which address conditions that may be postulated to occur at nuclear power plants during plant shutdown conditions (Recognition Category C). Also included are initiating conditions and example EALs that fully address conditions that may be postulated to occur at permanently Defueled Stations (Recognition Category D) and Independent Spent Fuel Storage Installations (Recognition Category E).

Revision 4 was resubmitted to NRC in September of 2002 with request for endorsement. In November 2002, NEI met with the NRC to discuss questions that developed from the staff's review of the September 2002 submittal. Changes to the

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September 2002 submittal were requested by NRC based on this meeting and additional reviews that were conducted in December 2002. Following incorporation of requested NRC changes, NEI 99-01 Revision 4 is being resubmitted with the request for full Regulatory Guide 1.101 endorsement. The only substantive changes incorporated into the January 2003 submittal are:

- Minor editing as outlined in the November 2002 NEI to NRC meeting handout, and
- Removal of the September 2002 changes to EAL 1 of HU3 and HA3.

Enclosed for your endorsement in Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," is the Final Draft, "Methodology for Development of Emergency Action Levels," NEI 99-01, Revision 4, January 2003.

The industry appreciates the efforts that you and your staff made to revise the methodology. If you have any questions please contact Alan Nelson at (202) 739-8110 or by e-mail (apn@nei.org).

Sincerely,



Lynnette Hendricks

Enclosure

c: Kathy Halvey Gibson