



Federal Emergency Management Agency

Washington, D.C. 20472

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Division of Inspection Program Management
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001


Dear Ms. Gibson:

This responds to your January 14, 2003, letter asking the Federal Emergency Management Agency (FEMA) for assistance to review the Draft Revised Nuclear Regulatory Commission (NRC) Inspection Manual Chapter 1601, "Communication Protocol for Assessing Offsite Emergency Preparedness Following a Natural Disaster."

After review of the Draft Inspection Manual Chapter 1601, we have no significant issues and a few minor comments (Attached).

Should you have any further questions, please feel free to contact me at (202) 646-3664.

Sincerely,

for 

Vanessa E. Quinn, Chief
Radiological Emergency Preparedness Branch
Technological Services Division

Attachment

**COMMUNICATION PROTOCOL FOR ASSESSING OFFSITE EMERGENCY
PREPAREDNESS FOLLOWING A NATURAL DISASTER**

1601-01 PURPOSE

To provide guidelines for communicating the assessment of offsite emergency preparedness (EP), and its impact on restart activities, following a natural disaster (e.g., hurricane, tornado, flood, storm, earthquake.) in the vicinity of power reactors.

1601-02 OBJECTIVES

02.01 Identify NRC groups or individuals responsible for monitoring licensee restart activities.

02.02 Identify Federal Emergency Management Agency (FEMA) contacts who can provide information on offsite conditions.

02.03 Establish communication links for coordinating information between the various organizations involved in plant restart, offsite recovery, or both.

1601-03 APPLICABILITY

03.01 This manual chapter is used when a natural disaster has occurred in the vicinity of a power reactor and is of such severity that plant damage is minimal, but damage to the offsite emergency planning zone (EPZ) infrastructure may be substantial or is undetermined. For cases involving natural disasters (declared or undeclared) that cause substantial damage to the plant, the plant restart activities should be coordinated using NRC Inspection Manual Chapter 0350, "Staff Guidelines for Restart Approval Oversight of Operating Reactor Facilities in an Extended Shutdown as a Result of Significant Performance Problems."

03.02 This manual chapter should be implemented consistent with the agreements of the Memorandum of Understanding between the NRC and FEMA dated June 17, 1993. In this regard, if a disaster damages the area around a licensed operating nuclear power plant to an extent that raises serious questions about the continued adequacy of offsite emergency preparedness, the identifying agency (FEMA/NRC) will inform the other promptly. When evaluating implementation of this manual chapter, among other things, consider whether alternative means can adequately compensate for the offsite function(s) impacted.

03.03 This manual chapter assumes the affected plant has shut down in anticipation of, or in response to, the natural disaster. While the scope of this manual chapter is limited to those communications needed to assess offsite emergency preparedness after a natural disaster, there may be other times when such lines of communications are needed. For example, the lines of communication described in this manual chapter may also be used

when a nuclear plant has kept operating during a natural disaster or for situations unrelated to a natural disaster (e.g., an extended shutdown) when the status of offsite emergency preparedness needs to be determined.

1601-04 BACKGROUND

The NRC has primary responsibility for ensuring the adequacy of emergency preparedness for commercial nuclear power plants. NRC coordinates this effort with FEMA, which is responsible for assessment of offsite emergency preparedness. The Memorandum of Understanding between FEMA and the NRC, dated June 17, 1993, describes the responsibilities and the authorities of the two agencies. It is important to remember that FEMA Headquarters management is the sole authority for generating this assessment. For this reason, direct communication and coordination between the two agencies is essential when natural disasters occur, with the potential to impact the onsite or offsite EPZ infrastructure. These events include, but are not limited to, hurricanes, tornadoes, floods, storms, and earthquakes. note

1601-05 RESPONSIBILITIES AND AUTHORITIES

The following individuals shall perform the listed actions. It is not necessary for communications to be restricted to those NRC personnel listed in this manual chapter. Reporting information to other NRC personnel should not delay the expected reporting in this manual chapter.

05.01 Chief, Emergency Preparedness and Environmental Health Physics (EP&EHP) Section, NRR/DIPM/IEHB

- a. Communicate important developments in the restart process or continued plant operation, and the assessment of offsite emergency preparedness to the following individuals:
 1. Chief of NRR's Emergency Preparedness and Radiation Protection Branch (PERB) Equipment and Human Performance Branch (IEHB);
 2. NRR Reactor Projects Directors or Project Managers for the affected sites;
 3. Chief of FEMA's ~~State and Local Regulatory Evaluation and Assessment Branch (PTEX-RC)~~ Radiological Emergency Preparedness Branch (REP);
 4. Branch Chief in the Division of Reactor Safety (DRS EP Branch Chief) for the affected region who has responsibility for inspecting licensee EP programs; and
 5. Director of the Division of Incident Response Operations (DIRO) within the Office of Nuclear Security and Incident Response (NSIR) Incident Response Division (IRD) of the Office for Analysis and Evaluation of Operational Data (AEOD).
- b. Inform FEMA's ~~PTEX-RC~~ ^{Office of National Preparedness, Technological Services Division's} REP Branch Chief of the licensee's estimated restart date and time, including heatup if the reactor is in cold shutdown. *Division Director*
- c. Obtain from the Chief of FEMA's REP Branch, as soon as it is available, FEMA's assessment regarding the status of offsite emergency preparedness and whether it is adequate to support plant restart or continued operations. As soon as this information is received, provide it to the NRR Reactor Projects Directors, regional DRS EP Branch Chief, and Director of IROD, NSIR/AEOD.

- d. If it appears that FEMA will be unable to complete its assessment of the state of offsite emergency preparedness within the time required by the licensee's restart schedule, or if the information received from FEMA is that the state of offsite emergency preparedness is not adequate to support plant restart on the schedule proposed by the licensee, or the plant is continuing to operate because the event occurred without warning, do the following:

1. Obtain a thorough understanding of the significance of the EP issues in question;
2. Determine what compensatory measures, if any, are (or could be) available to offset the EP program elements that are not fully functional;
3. Obtain the projected date on which the EPZ infrastructure will be fully functional or when adequate compensatory measures will be in place; and
4. Discuss these issues with NRR and regional management to determine follow-up actions with the licensee, FEMA, and others, as appropriate, *which may include shutdown of operations or continued shutdown of operations.*

05.02 NRR Project Directors for the Affected Sites. Communicate important developments in the restart process or continued plant operation, and the assessment of offsite emergency preparedness with the NRR Executive Team and the Project Managers for the affected sites.

05.03 NRR Project Managers for the Affected Sites

- a. Communicate important developments in the restart process or continued plant operation and the assessment of offsite emergency preparedness with the following individuals:
1. NRR Project Director for the affected site;
 2. Chief of the Emergency Preparedness and Environmental Health Physics (EP&EHP) Section, IEHP/DIPMPERB/DRPM/NRR; and
 3. Regional Division of Reactor Projects (DRP) Branch Chief for the affected site.
- b. Obtain from the Chief of the EPHP Section, NRR/DIPM/IEHB, as soon as it is available, FEMA's assessment regarding the status of offsite emergency preparedness and whether it is adequate to support plant restart or continued operation. As soon as this information is received, provide it to the NRR Executive Team and regional DRP Branch Chief for the affected site.

05.04 Regional State Liaison Officers and/or Regional Assistance Committee (RAC) Representatives. Obtain information regarding important developments in the onsite and offsite recovery and restart process or continued plant operation and provide that information to the following individuals:

- a. Regional DRP Branch Chiefs for the affected sites;
- b. Regional DRS EP Branch Chief; and
- c. FEMA Regional Assistance Committee (RAC) Chairpersons for the affected FEMA regions and/or the FEMA Regional National Preparedness Division or Technical Hazards Branch representative, as appropriate.

05.05 Regional Division of Reactor Projects (DRP) Branch Chiefs

- a. Communicate important developments in the restart process or continued plant operation, and the assessment of offsite emergency preparedness with the following individuals:
 1. Senior regional management;
 2. NRR Reactor Projects Director or the Project Manager for the affected site;
 3. Regional DRS EP Branch Chief;
 4. Regional State Liaison Officer or the RAC representative; and
 5. Resident Inspectors for the affected sites.
- b. Establish a dialogue with licensee management to determine their schedule for reactor restart, or the status of continued operations and assessments of risks involved. Inform them whether any offsite EP assessments are scheduled, or ongoing, so that licensee management may factor these into their plans.
- c. Once informed by the NRR Project Manager of FEMA's assessment that the status of offsite EP is adequate to support restart or continued plant operation, provide this information to senior regional management. Note that this assessment can only originate from FEMA Headquarters.

05.06 Regional Division of Reactor Safety (DRS) EP Branch Chiefs. Communicate important developments in the restart process or continued plant operation and the assessment of onsite and offsite emergency preparedness with the following individuals:

- a. Chief of the EP&EHP Section, PERB/DRPM/NRRNRR/DIPM/IEHB;
- b. Regional DRP Branch Chiefs for the affected sites; and
- c. Regional State Liaison Officer and/or the RAC representative.

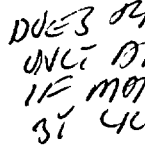
05.07 Senior Resident Inspectors

- a. Communicate important developments in the restart process or continued plant operation, and the assessment of onsite and offsite emergency preparedness with the regional DRP Branch Chief.
- b. The following information should be relayed as soon as it is known:
 1. Licensee's expected commencement of heatup and/or rod withdrawal, if the reactor is shut down;
 2. The plants operating status including a qualitative assessment of the risk of continued operation, if applicable; and
 3. General condition of the EP infrastructure surrounding the plant (see communications protocol identified in the caution statement that follows).

- (a) The general condition may be determined from discussions with licensee personnel. (Obtaining this information does not require an independent inspection to verify the status.)

CAUTION: It is not appropriate to contact offsite agencies to determine this information. That responsibility rests with the appropriate FEMA regional office. All decisions concerning the adequacy of offsite EP will be based on FEMA assessments. Resident Inspector input in this area is intended to augment information gathered by FEMA.

- (b) Particular effort should be made to determine the status of the following:

- (1) Communication circuits between the licensee and the offsite authorities
- (2) Roads leading to and from the plant area;
- (3) Emergency sirens, if maintained by the licensee; 
- (4) Licensee's emergency response facilities; and
- (5) Licensee's ability to staff the required emergency response organization positions.

05.08 NRC Operations Center. Relay any incoming information from any source (licensee, NRC employee, other Federal agency employee) that may affect the restart process, or continued plant operation, to the EPHP Section Chief, PERB/DRPM/NRRNRR/DIPM/IEHB, during normal working hours.

1601-06 GUIDANCE

06.01 The restart decision, if applicable, will be made jointly by the NRR Executive Team and Regional Administrator. The Regional Administrator will inform the licensee of the restart decision.

06.02 The most important activity to be pursued by all NRC parties is the establishment of informative and aggressive communications. The last page of this chapter is a figure that shows the intended routes of information, as well as significant decision flow paths. It is not necessary to continuously maintain open circuits with other offices or agencies, important information and developments should be relayed to designated contacts as quickly as possible. The NRR Executive Team and the Regional Administrator need to be reliably informed so that they can communicate with the licensee for a safe restart. This will serve to minimize the impact of the loss of the affected plant's generating capacity on the populations living in the affected areas.

06.03 This protocol and the attached flow chart assume that all communications described occur serially (i.e., in relay fashion). However, if there is an opportunity for teleconferencing between the parties, that option should be exercised to the extent possible. This will ensure rapid and accurate communications.

06.04 If the reaffirmation of adequate offsite emergency preparedness is not forthcoming before the licensee plans to heat up the plant or restart the reactor, or if the plant continues to operate, then inform the NRR Executive Team and the Regional Administrator of this fact as soon as possible. These officials will evaluate the need for the NRC to issue an

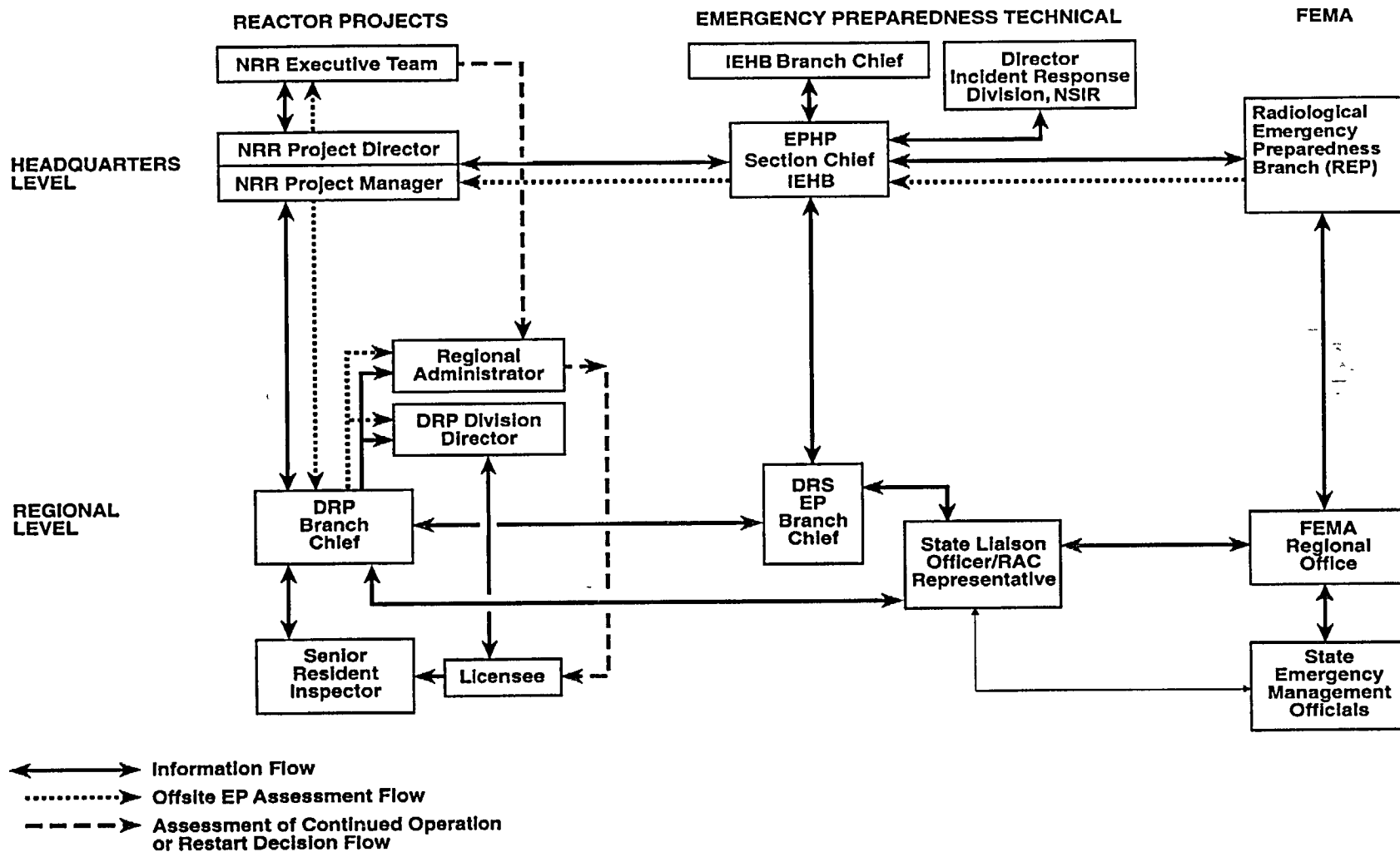
order, or confirmatory action letter to the licensee. This will ensure that the restart does not occur under unsafe conditions, and the plant is maintained in a condition of minimal risk. These senior officials will also determine whether the affected plant is subject to the restart provisions of Inspection Manual Chapter 0350, "Staff Guidelines for Restart Approval Oversight of Operating Reactor Facilities in an Extended Shutdown as a Result of Significant Performance Problems."

1601-07 REFERENCES

NRC Inspection Manual Chapter 0350, "Staff Guidelines for Restart Approval Oversight of Operating Reactor Facilities in an Extended Shutdown as a Result of Significant Performance Problems."

FEMA-NRC Memorandum of Understanding (MOU), dated June 17, 1993.

END



LEGEND:

NSIR - Office of Nuclear Security and Incident Response
 DRP - Regional Division of Reactor Projects
 DRS - Regional Division of Reactor Safety
 EPHP - Emergency Preparedness Health Physics Section, NRR/DIPM/IEHB/EPHP
 FEMA - Federal Emergency Management Agency

NRR - Office of Nuclear Reactor Regulation
 IEHP - Equipment and Human Performance Branch, DIPM/ NRR
 PTEX-RGREP - Radiological Emergency Preparedness Branch, FEMA
 RAC - FEMA Regional Assistance Committee