

February 24, 2005

Vanessa E. Quinn, Chief  
Radiological Emergency Preparedness Section  
Federal Emergency Management Agency/DHS  
500 C Street, SW  
Washington, D.C. 20472

SUBJECT: REGULATORY STRUCTURE FOR NEW PLANT LICENSING,  
PART 1: TECHNOLOGY-NEUTRAL FRAMEWORK - SECY-05-0006  
(DRAFT NUREG-3-2005) & MARCH 14-16, 2005, PUBLIC WORKSHOP

Dear Ms. Quinn:

The purpose of this letter is to inform the Federal Emergency Management Agency (FEMA) of U.S. Nuclear Regulatory Commission's (NRC's) ongoing work associated with preparation for licensing new nuclear reactors, and to invite FEMA to an upcoming March 14-16, 2005, public workshop that will engage industry and other stakeholders on this subject. This effort is a continuation of work that has been under way for the past several years, and which considers possible improvement in the licensing environment for advanced nuclear power reactors to minimize complexity and uncertainty in the regulatory process.

NRC recently released to the public a Commission Paper (SECY-05-0006) (Enclosure 1), which includes a working draft of NUREG-3-2005, entitled "Regulatory Structure for New Plant Licensing, Part 1: Technology-Neutral Framework" for public review and comment. The SECY paper and draft NUREG are also available on our public Web site ([www.nrc.gov](http://www.nrc.gov)) at ADAMS Nos. ML043560093 and ML043560280, respectively. The purpose of this working draft NUREG is to provide an approach, scope, and acceptance criteria that could be used by the NRC staff to develop a technology-neutral set of requirements for future plant licensing, and to identify the key technical and policy issues that must be addressed.

On February 1, 2005, NRC published a proposed public workshop notice in the *Federal Register* (70 FR 5228) related to this work. The Federal Register Notice is enclosed, along with a 4-page summary of various EP-related excerpts and background information from the SECY paper and draft NUREG (Enclosures 2 and 3, respectively).

The NUREG provides a comprehensive analysis of anticipated risk associated with the operation of advanced reactors, and covers numerous policy issues associated with reactor licensing, including offsite emergency preparedness (EP). The role of emergency preparedness in defense-in-depth is discussed, as it relates to possible simplification of the emergency response plans. A significant issue in this discussion is the reduction in the size of the emergency planning zones (EPZs) for reactors that are designed with greater safety margins than the current light water reactor reactors.

Before such a significant policy change to offsite EP would be allowed, both NRC and FEMA would need to thoroughly consider all relevant issues - both technical and policy. The enclosures provide the context for this effort, and identify what we believe to be the high-level EP policy issues that would have to be considered. While the NUREG is technically complex and comprehensive, the EP-related portions are less developed, and identify various advanced reactor EP issues that have been addressed by industry over the past several years. No emergency preparedness changes, either onsite or offsite, are being proposed by NRC at this time. The purpose of the March workshop is to solicit industry and public comments regarding any desired change to the NUREG, and discuss associated technical and policy issues.

We look forward to your participation in the March 14-16 public workshop. Any questions pertaining to the above may be directed to either Stacey Rosenberg (301-415-3868) or Bruce Musico (301-415-2310).

Sincerely,

**/RA/**

Anthony McMurtray, Chief  
Inspection & Communications Section  
Emergency Preparedness Directorate  
Division of Preparedness and Response  
Office of Nuclear Security and Incident Response

Enclosures: 1. SECY-05-0006 and NUREG-3-2005 (Regulatory Structure for New Plant Licensing, Part 1: Technology-Neutral Framework)  
2. *Federal Register* Notice, 70 FR 5229, February 1, 2005  
3. NRC Working Draft Report-Regulatory Structure for New Plant Licensing, Part 1: Technology-Neutral (Risk-Informed) Framework - Emergency Planning Issues

cc: Kenneth Wierman (FEMA)  
James Purvis (FEMA, w/o enclosures)

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James Purvis (FEMA, w/o enclosures)    SISP Review Complete A. McMurtray

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EPD Reading File	A. McMurtray	D. Lew, RES	E. Weiss	S. Rosenberg
B. Musico	M. Drouin, RES	L. Dudes, NRR		

\*See Previous Concurrence

Adams Accession Number: Package: ML050390194 Letter: ML050390190

Enclosures 1 ML043560093 & ML043560280 Enclosure 2: ML050390399 Enclosure 3: ML050390243

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