
Draft Preliminary Enhancements to Emergency Preparedness Regulations and Guidance

March 5, 2008



On-Shift Collateral Duties

- Source:
 - Commission Order, EA-02-26
- Goal:
 - Ensure resources are available for emergency plan implementation and implementation of protective measures
 - Ensure that on-shift personnel are not overburdened
- Approach:
 - Codify a requirement in Part 50, Appendix E that emergency response personnel do not have competing duties that interfere with primary emergency response functions
 - Establish criteria for shift staffing duties to ensure responders are not overburdened
 - Update guidance



Emergency Action Levels for Security Events

- Source:
 - Commission Order, EA-02-26
 - NRC Bulletin (BL) 2005-02
 - Goal:
 - Provide regulatory certainty and establish unambiguous enforceable emergency classification and action level criteria for hostile action events
 - Ensure appropriate response actions for hostile action events are implemented
 - Approach:
 - Codify a requirement in Part 50, Appendix E to require explicit hostile action based criteria for emergency classification and action levels
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Emergency Response Organization Augmentation and Alternate Facilities

- Source:
 - Commission Order, EA-02-26
 - BL 2005-02
- Goal:
 - Ensure the ability of the emergency response organization (ERO) to take actions to mitigate facility damage or implement protective measures
 - Require an alternate facility for ERO
- Approach:
 - Amend regulations in Part 50, Appendix E to require licensees have alternate facilities for ERO augmentation during security events
 - Update guidance



Licensee Coordination with Offsite Response Organizations

- Source:
 - Commission Order, EA-02-26
 - Comprehensive reviews
- Goal:
 - Ensure supplemental resources are available to respond to a hostile action at a nuclear power plant
- Approach:
 - Amend regulations in Part 50, Appendix E to explicitly require licensees coordinate with offsite response organizations to ensure adequate resources are available and preplanned actions will be carried out



Protection for Onsite Personnel

- Source:
 - BL 2005-02
- Goal:
 - Protect onsite workers during hostile action emergencies
 - Identify alternative protective action schemes and site-specific solutions
- Approach:
 - Add a new paragraph in Part 50, Appendix E to require protection of onsite personnel during hostile action events
 - Allow flexibility for each site
 - Update guidance



Security Event-Based Drills and Exercises

- **Source:**
 - BL 2005-02
 - Staff requirements memorandum (SRM) M060502, June 29, 2006
- **Goal:**
 - Incorporate hostile action scenarios into training, drill, and exercise programs
 - Ensure scenarios are challenging, incorporate a wide range of scenarios, and avoid preconditioning
- **Approach:**
 - Coordinate with FEMA
 - Update regulations in 10 CFR 50.47 and Part 50, Appendix E to explicitly require licensees incorporate hostile action based scenarios in their drill and exercise program
 - NRC review and approval of graded exercises
 - Update NRC and FEMA guidance



Decrease in Effectiveness

- **Source:**
 - Staff review of EP regulations and guidance (SRM-SECY-06-0200)
- **Goal:**
 - Maintain capabilities and resources relative to the emergency plan
 - Ensure changes to the approved emergency plan are properly evaluated
 - Ensure changes that reduce the effectiveness of the plan are reviewed by NRC
 - Ensure consistent and predictable implementation and enforcement
- **Approach:**
 - Revise 10 CFR 50.54(q) and issue a new Regulatory Guide
 - Clarify the concepts and implementation of “maintain in effect”
 - Use the term “reduction in effectiveness”



Emergency Classification Timeliness

- Source:
 - Staff review of EP regulations and guidance (SRM-SECY-06-0200)
- Goal:
 - Ensure timely emergency response actions, including notification of offsite response organizations
 - Enhance ability to implement protective measures
 - Instill a sense of urgency for classification, but do not force incorrect classifications due to time constraints
- Approach:
 - Add a new paragraph to Part 50, Appendix E and update guidance to require the capability to classify and declare an emergency within 15 minutes of the availability of information that an EAL has been or may be exceeded
 - Retract EPPOS-2, “Emergency Preparedness Position on Timeliness of Classification of Emergency Conditions”



Evacuation Time Estimate Updating

- Source:
 - Staff review of EP regulations and guidance (SRM-SECY-06-0200)
- Goal:
 - Establish a frequency for evacuation time estimate (ETE) updates and identify other changes that require ETE update
 - Establish consistency of ETE review/update across the industry
- Approach:
 - Codify a requirement for ETE updates in 10 CFR 50.47 and in Part 50, Appendix E
 - Updates if ETE changes by 10%
 - Update/combine guidance in NUREG/CR-6963, “Development of Evacuation Time Estimates for Nuclear Power Plants” and NUREG/CR-4831, “The State of the Art in Evacuation Time Estimate Studies for Nuclear Power Plants” into a single ETE guidance document



Emergency Operations Facility – Performance Based Approach

- Source:
 - Staff review of EP regulations and guidance (SRM-SECY-06-0200)
- Goal:
 - Define the conditions under which licensees could establish consolidated emergency operations facilities (EOFs) without prior NRC approval
 - Outline the functions and capabilities necessary for a consolidated EOF
- Approach:
 - Update 10 CFR 50.34, 10 CFR 50.47, Part 50, Appendix E, and guidance to reflect a performance based approach to consolidated EOFs
 - Remove requirement for “near site” in regulations



Backup Means for Alert and Notification Systems

- Source:
 - Staff review of EP regulations and guidance (SRM-SECY-06-0200)
- Goal:
 - Ensure the public can be alerted if a problem exists with the primary alert and notification system (ANS)
- Approach:
 - Codify a requirement in Part 50, Appendix E for a backup to the primary ANS
 - Develop guidance
 - Allow flexibility on choice of backup system, with no timeliness criterion for backup system
 - Coordinate with FEMA



NUREG-0654/FEMA-REP-1

- Develop a supplement in support of the enhancements to the regulations
 - Scheduled for publication in September 2010
 - Also in support of FEMA's Radiological Emergency Preparedness Program Manual updates for security-based drills and exercises
- NRC and FEMA are working together to develop guidance and implementation
- Joint FEMA/NRC Exercise Task Force



How Can You Contribute?

- Provide feedback on draft preliminary rule language
 - www.regulations.gov
 - Docket number: NRC-2008-0122
 - Feedback will not be publicly addressed by NRC
- Review documents on the NRC Website
 - Rulemaking Plan: ML070440148
 - Draft Preliminary Rule Language: ML080910069
- Attend public meetings
 - Concurrent with proposed rule (2009)
 - 3-4 meetings