

May 06, 2008

MEMORANDUM TO: William A. Gott, Branch Chief
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

FROM: Jerry R. Hale, Emergency Response Coordinator **/RA/**
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

SUBJECT: MEETING BETWEEN THE NUCLEAR REGULATORY
COMMISSION STAFF AND STAKEHOLDERS CONCERNING
PROPOSED RULEMAKING FOR INCIDENT RESPONSE

On March 26, 2008 the Nuclear Regulatory Commission (NRC) staff met with the Nuclear Energy Institute, licensee representatives and other stakeholders at NRC headquarters concerning proposed incident response rulemaking. Enclosure 1 lists the meeting attendees.

A public meeting notice was issued on March 10, 2008, and was posted on the NRC's external (public) web page (ADAMS Accession No. ML080730048). The notice included the meeting agenda (Enclosure 2), which was also available as a handout at the meeting. The discussions included (1) Plant Specific Data; (2) Plant Reference Data; (3) Exercise Data; (4) Continuous Connectivity.

In opening remarks, Mr. Brian McDermott, Deputy Director, Incident Response, Office of Nuclear Security and Incident Response noted that the purpose of this public meeting is to engage industry stakeholders well in advance of any incident response rulemaking activities. Mr. McDermott provided a brief overview of the four discussion topics and thanked the attendees for their participation. After opening remarks, the following incident response issues were discussed. Questions and comments from the participants are listed in Enclosure 3.

Plant Specific Data

NRC staff presented an overview of the current Emergency Response Data System (ERDS). ERDS is based on a 1980's incident response model that utilizes a limited set of plant data parameters, and the existing ERDS rule was written accordingly. However, since implementation of ERDS, licensees have developed newer "symptom-based" plant emergency procedures that utilize significantly expanded plant data, including data points outside those reported via ERDS. The proposed rulemaking would increase the number of plant data points to include those that support the plant Emergency Operating Procedures and Emergency Action Levels.

Plant Reference Data

In September, 2006, NRC issued Regulatory Issue Summary 2006-21, "Improving Response Capabilities Through the Use of An Incident Response Electronic Library", a voluntary process

for reporting plant reference data. The NRC has found great value in having readily available plant-specific reference information, such as simplified plant drawings, site layout, Emergency Planning Zone maps, plant emergency operating procedures, emergency plans and implementing procedures, Emergency Action Levels, organization charts, and contact information. However, less than half of the licensees have responded to the request, and some of the submissions have been incomplete.

Exercise Data

To effectively train a response organization, use of realistic plant data is a primary element in the conduct of emergency drills and exercises. Access to simulated ERDS data allows incident responders to realistically perform their analysis functions and assess licensee actions and recommendations. Transmission of simulated plant data from the licensee to NRC, via ERDS during an exercise offers an effective means of providing this key training opportunity. Some licensee have successfully transmitted simulated plant data to ERDS from their full-scope plant simulators. However, not all plant simulators are configured as such, and other equivalent electronic means of transmitting ERDS data may be considered.

Continuous Connectivity

Appendix E, Section VI, Paragraph 1, requires licensees to periodically test ERDS to verify operability. The requirement resulted from numerous connectivity problems related to voice-quality telephone lines, as well as hardware and software problems. While the quarterly tests do provide an indication of ERDS operability, they do not ensure ERDS is available all the time. Problems that occur after testing is completed may not be detected until the next quarterly test, or, in the worst case, at the time ERDS is needed for an actual plant incident. Continuous connectivity would provide NRC with a means of monitoring the availability of ERDS, and a means of implementing timely compensatory measures upon loss of data transmission.

Enclosure:
As Stated

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Enclosure:
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