

From: Robert Moody
To: Doug Girouard
Date: 11/18/04 11:10AM
Subject: Re: Your 8/28 e-mail to the NRC

The intent of Table B -1 in NUREG-0654 is to have a cadre of personnel who will provide initial facility accident response in key functional areas. Table B -1 provides one acceptable way to meet regulatory requirements. The NRC has found a number of combinations of personnel with expertise in the functional areas identified in Table B -1 to be acceptable. The intent of the "/" in Table B -1 to allow a licensee flexibility to select personnel best suited to provide initial facility accident response.

In the key functional area of plant system engineering, repair and corrective action, the intent of the "/" is that a person with expertise in mechanical maintenance or as a rad waste operator be on shift. Note that the "" allows this task to be provided by shift personnel assigned other functions. Relative to the mechanical maintenance area of expertise, Table B-1 identifies that the licensee have the capability for another person to respond in 60 minutes. Relative to the person with rad waste operator expertise, the intent of Table B -1 is for the licensee to have the capability for another person to respond in 60 minutes.

For the position title (or expertise) of electrical maintenance/instrument and control technician, Table B -1 identifies that one person with electrical maintenance expertise be on shift and the licensee have the capability for another person with electrical maintenance expertise to respond in 30 minutes and an additional one to respond in 60 minutes. Relative to instrument and control technician expertise, the intent of Table B -1 is that the licensee have the capability for a person with this title or expertise to respond in 30 minutes.

>>> Doug Girouard <[REDACTED]> 11/16/04 11:34AM >>>

Bob,

Thanks for getting back to me. My question is not whether NUREG-0654 is guidance or a regulation, rather it is a specific question of what the intent of certain entries in NUREG-0654 Table B-1 is.

More specifically, is the intent of NUREG-0654 to have:

one "Mechanical Maintenance" person of expertise on shift with the capability to add one additional person of this expertise within 60 minutes and

one "Electrical Maintenance" persons of expertise on shift with the capability to add one additional person of this expertise within 30 minutes and another within 60 minutes

one "Rad Waste Operator" person of expertise within 60 min and

finally an "Instrument and Control (I&C) Technician" person of expertise within 30 minutes?

If the back slash(/) characters were not present in this portion of the table it would be clear to me what the intent of this portion of table is.

Speculatively, it almost seems like there was an error in not omitting these slashes from some other version.

Thanks again for your time and effort,
Doug Girouard

Robert Moody <REM2@nrc.gov> wrote:
Doug,

NUREG-0654 is guidance, not a regulation. As such, it is one acceptable way to meet regulatory requirements. There are many ways to comply with a regulation and many acceptable alternatives to the guidance in NUREG-0654 have been found acceptable by the NRC. NUREG-0654 would be most useful to a new site that didn't have an emergency plan, but once a site has an "approved" plan, the "approved" plan is now the document that becomes the basis from which any future changes are made, not NUREG-0654. The plan must still meet the requirements of the regulations, not NUREG-0654, following any changes. I think a phonecall would allow me to understand better your perspective and the context of your questions.

Bob M.

>>> Doug Girouard 11/15/04 12:47PM >>>
Bob,

Since we are have such a difficult time connecting via phone, could we attempt to do this via email?

Thanks,
Doug Girouard

Robert Moody wrote:
My hours are 7 to 4:45 EST. I think it will be asier to answer your questions over the phone. Let me know of a convenient time for you and I'll call.

>>> Doug Girouard 11/03/04 07:50PM >>>
Bob,

My home phone is [REDACTED]. However, I'm very difficult to reach during business hours. Th best medium for communication with me is email. Thanks for your time and consideration.

Doug Girouard

Robert Moody wrote:
Your e-mail has been referred to me. Please e-mail me a phone number, so that I may call you to discuss your question.

Bob Moody
Division of Preparedness and Response

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Mail Envelope Properties (419CC978.588 : 16 : 17173)

Subject: Re: Your 8/28 e-mail to the NRC
Creation Date: 11/18/04 11:10AM
From: Robert Moody

Created By: REM2@nrc.gov

Recipients

 (Doug Girouard)

Action

Transferred

Date & Time

11/18/04 11:10AM

Post Office**Delivered****Route**

yahoo.com

Files

MESSAGE

Size

8046

Date & Time

11/18/04 11:07AM

Options

Auto Delete: No
Expiration Date: None
Notify Recipients: Yes
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject:

No

Security:

Standard

To Be Delivered:

Immediate

Status Tracking:

Delivered & Opened