



NUCLEAR ENERGY INSTITUTE

Industry Key Points: 12/17/09 HAB Public Meeting

Proposed Continuation of Hostile Action-Based Initiative during Future Biennial Exercises Delivered by Susan Perkins-Grew

NRC/FEMA Initiative: To continue the learning process of the HAB Drill Initiative, it has been proposed that the NRC and FEMA sustain hostile action-based activities by adopting a transitional phase following the end of the voluntary initiative. The proposal would identify volunteer licensee and OROs, that would conduct regularly scheduled, evaluated biennial exercises to integrate the demonstration of non-evaluated hostile action elements.

Industry Position: Industry has already concluded at the August 6, 2009 NEI EP Working Group Meeting that continuation of the use of HAB scenarios during the anticipated transition period (2010-2012) is in the best interest of the industry and ORO stakeholders. Further, industry agrees with the NRC/FEMA that this transition period provides a valuable opportunity to practice, prepare, and validate draft procedures and Revision 2 to the NEI Guideline (under development) in advance of the requirements of the final rule.

The industry can maximize the value of HAB functional demonstrations during the transition period in a non-evaluated setting. This position is based upon the following:

- The industry plans on using the transition period as an opportunity to improve functional performance. Practice, preparation, and validation of draft procedures and Revision 2 of the NEI Guideline can be most effectively accomplished in a table top or drill setting that focuses on the key stakeholders in the same manner demonstrated during the pilot phase.
- During this transition period demonstrating a HAB scenario in an evaluated setting may provide less value than that achieved in a non-evaluated setting. Evaluation creates a distraction from our focus on improving functional performance of HAB objectives with the inclusion of required REP elements. For example, combining 2002 REP criteria (evaluated) with draft new criteria in support of HAB (not evaluated) could be confusing to the participants.
- HAB tabletops and drills in a non-evaluated exercise setting provide an opportunity for on the spot correction/adjustment and the ability to stop and openly discuss performance and possible modifications for process/procedure improvements. The procedures and processes developed to accommodate an HAB scenario would be best vetted in a non-evaluated setting.
- Transition period focus should be redirected from "evaluation" to identification of those licensees and OROs who need additional assistance and identify opportunities for FEMA field technical assistance in preparation for final rule implementation. An example would be those OROs who may need assistance in improving incident command capability and implementation.

Industry Key Points: 12/17/09 HAB Public Meeting

- OROs have indicated that they prefer an off-year, non-evaluated setting for future HAB demonstrations.

Alternate Approach:

Licensees have planned for HAB scenarios in their drill program during the transition phase.

NEI will work with the industry to determine level of effort by various licensees to maintain performance and proficiency (e.g. who is planning full drills, tabletops, etc).

- NEI will reach out to licensees who have not participated since the beginning of the three-year pilot to determine how they will prepare for Revision 2 implementation.

NEI will identify licensees who will be conducting drills with OROS using Revision 2 of the Guideline. These will become opportunities for:

- Ensuring Revision 2 is properly vetted
- observation opportunities for industry
- Introduce a radiological release of reasonable magnitude
- Generate additional OE
- Determine which REP activities would best be performed out of sequence during a future evaluation

NRC/FEMA could partner with industry through NEI and perform observations.

- NRC can continue to vet draft inspection procedure.
- FEMA can continue to vet draft evaluation criteria
- FEMA can identify needs for additional technical assistance.