

POLICY ISSUE INFORMATION

October 26, 2010

SECY-10-0139

FOR: The Commissioners

FROM: James T. Wiggins, Director
Office of Nuclear Security and Incident Response

SUBJECT: ANNUAL UPDATE ON THE STATUS OF EMERGENCY PREPAREDNESS
ACTIVITIES

PURPOSE:

To update the Commission on the status of significant emergency preparedness (EP) issues and activities.

BACKGROUND:

In the staff requirements memorandum (SRM), dated May 4, 2005, for SECY-05-0010, "Recommended Enhancements of Emergency Preparedness and Response at Nuclear Power Plants in the Post-9/11 Environment," dated January 10, 2005, the Commission directed the staff to provide a semiannual report on important EP activities. In SECY-07-0182, "Semi-Annual Update on the Status of Emergency Preparedness Activities," dated October 19, 2007, the staff asked the Commission to approve a change in the frequency of this report from semiannual to annual. In SRM-SECY-07-0182, "Staff Requirements—SECY-07-0182—Semi-Annual Update on the Status of Emergency Preparedness Activities," dated December 21, 2007, the Commission approved the request, adding the following:

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The annual paper should become more of a self-assessment and communication tool, perhaps summarizing accomplishments and providing a status on improvement initiatives within our EP programs. Such an assessment should be coordinated with and not overlap the Reactor Oversight Process self-assessment of the EP cornerstone, and should be designed to aid the staff in effecting continuous and coordinated improvements to the overall EP program, as well as to inform the Commission and public of progress. (W200500137)

DISCUSSION:

This paper summarizes the key accomplishments and challenges of the EP program and provides the status of significant initiatives based on the staff's review of the EP activities that occurred in fiscal year (FY) 2010. Overall, the EP program established and overseen by the U.S. Nuclear Regulatory Commission (NRC), in conjunction with the Federal Emergency Management Agency (FEMA), continues to provide reasonable assurance of the health and safety of the public in the vicinity of licensed facilities for which emergency plans are required. These activities support the NRC Strategic Plan and the objectives of openness, effectiveness, and operational excellence. The enclosure to this paper provides supplemental information on overall EP program accomplishments, ongoing initiatives, challenges, and upcoming activities.

The staff continues to work extensively with FEMA on proposed changes to NRC regulations to enhance EP requirements. The staff has addressed and adjudicated more than 680 public comments that it received on proposed NRC regulations and guidance documents and collaborated with FEMA to address comments relevant to both agencies. As part of this rulemaking effort, the staff continues to seek comments from all stakeholders to address the cumulative effect of the EP implementation schedule. The EP final rule is on schedule for submittal to the Commission in February 2011.

A draft revision to "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, Guidance for Protective Action Recommendations for General Emergencies", NUREG-0654/FEMA-REP-1, Supplement 3, was published in March 2010, and is scheduled for publication in FY 2011. This revision will address advances in the understanding of potential accident sequences, protective action strategies, and consequence modeling. During FY 2010, the NRC held four public meetings in coordination with FEMA to discuss the proposed new guidance and to facilitate stakeholder involvement. The staff will continue to engage FEMA and other stakeholders.

The staff initiated three projects to explore risk-informed and performance-based enhancements to the NRC's EP regulatory regimen which are targeted for completion in FY 2012:

- Risk Informing Regulatory Oversight of Emergency Preparedness: The staff initiated a study to identify a spectrum of representative accident scenarios that could be used to quantify the protection provided by the current EP regulatory regimen and form a basis for risk-informing regulatory oversight.
- Risk Informing Emergency Action Levels (EAL): The staff is examining the consistency of the EAL scheme currently approved by the NRC in order to identify any EAL entry criteria that may need to be enhanced.

- Performance Based Approach for Offsite Evaluation: This project will study the current methodology for evaluation of offsite EP and assess the potential for use of performance-based evaluation methodologies.

Consistent with the Commission's goals of openness and transparency, the staff has expanded its outreach to other Federal agencies, industry, and State and local stakeholders. The staff continues to use web-based conferencing, periodic newsletters, and other means of communication to enhance stakeholder involvement and participation in proposed regulatory improvement activities. The White House recognized the staff's use of web-based conferencing for public meetings in the Open Government Initiative Innovations Gallery. In addition, the staff has actively engaged the emergency management community through organizations such as the National Emergency Management Association, International Association of Emergency Managers, and Conference of Radiation Control Program Directors to further enhance participation in developing proposed changes to EP regulations and guidance.

RESOURCES:

No additional funds are required in FY 2011 and FY 2012 in support of identified EP activities.

COORDINATION:

The Office of the General Counsel reviewed this package and has no legal objection. The paper was coordinated with the Office of the Chief Financial Officer for resource implications.

/RA/

James T. Wiggins, Director
Office of Nuclear Security and Incident Response

Enclosure:
As stated

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EMERGENCY PREPAREDNESS PROGRAM ACCOMPLISHMENTS, ONGING INITIATIVES, CHALLENGES, AND UPCOMING ACTIVITIES

PURPOSE

This enclosure provides the background for the annual paper on emergency preparedness (EP) activities in the following categories:

- EP regulatory improvement activities
- EP inspection activities
- EP licensing activities
- EP outreach/communication activities

The categories have the following four sub-areas, where appropriate:

- (1) accomplishments
- (2) ongoing initiatives
- (3) challenges
- (4) upcoming activities

EMERGENCY PREPAREDNESS REGULATORY IMPROVEMENT ACTIVITIES

Accomplishments

NUREG/CR-6953, Volume 3, "Technical Basis for Protective Action Strategies", issued August 2010, provides a technical basis for decision criteria that licensees and offsite response organizations (OROs) can use to enhance protective action strategies for nuclear power plant accidents that progress rapidly. The analysis integrated advances in the knowledge of potential accident sequences, protective action strategies, and consequence modeling. The EP planning basis includes the potential for rapidly progressing accidents, and this analysis was performed to specifically identify protective action recommendation (PAR) strategies for rapidly progressing accidents to support the PAR logic diagram that was developed for an update to NUREG-0654/FEMA-REP-1, Supplement 3, "Guidance for Protective Action Recommendations for General Emergencies," issued March 2010.

In response to Homeland Security Presidential Directive 8, "National Preparedness," dated December 17, 2003, the Federal Emergency Management Agency (FEMA) proactively engaged State and local response organizations through the integration of the Radiological Emergency Preparedness Program (REPP) into the national Homeland Security Exercise Evaluation Program (HSEEP) for the scheduling, development, conduct, and evaluation of drills and exercises. Under HSEEP's standardized process, State and local response organizations may receive credit for actual events and for the conduct of nonradiological EP drills and exercises. FEMA also successfully conducted HSEEP pilot programs with State and local response organizations at San Onofre Nuclear Generating Station, Palo Verde Nuclear Generating Station, and Browns Ferry Nuclear Plant. The integration of REPP drills and exercises under HSEEP has reduced the burden on State and local organizations and provided alternative methods for verifying offsite capabilities within REPP requirements. (W200900088)

Enclosure

Ongoing Initiatives

Initiative 1—Emergency Preparedness Rulemaking

The public comment period for the EP proposed rulemaking closed on October 19, 2009. The staff received a total of 94 submittals containing more than 680 comments on the proposed rule and associated guidance documents. On December 8, 2009, the U.S. Nuclear Regulatory Commission (NRC), FEMA staff, and a panel of external stakeholders briefed the Commission on the major topics and concerns identified in the submittals. In Staff Requirements Memorandum (SRM) M091208, “Staff Requirements—Briefing on the Proposed Rule: Enhancements to Emergency Preparedness Regulations, 9:30 a.m., Tuesday, December 8, 2009, Commissioners’ Conference Room, One White Flint North, Rockville, Maryland (Open to Public Attendance),” dated January 13, 2010, the Commission directed the staff: (1) to ensure that guidance documents align with the rulemaking language to provide clarity on issues on which stakeholders expressed confusion; (2) to address the impacts of the rule and consider providing a public draft of the rule language and guidance documents via the NRC’s public web site as the staff addresses comments and works with the Advisory Committee on Reactor Safeguards (ACRS) on the draft EP final rule; and (3) to consider the cumulative effects of the new regulations and others that may already be scheduled for implementation. SRM M091208 also directed the staff to continue to work with FEMA in considering comments from State and local officials and other interested stakeholders to enhance EP regulations and guidance.

As a result of the stakeholder comments that the NRC received, the staff made several changes to the proposed rule and guidance documents. The staff jointly resolved comments involving both onsite and offsite EP issues with FEMA staff. FEMA updated proposed offsite guidance documents to maintain alignment with the draft final rule language and onsite guidance. The NRC has no significant unresolved issues related to the rulemaking remaining with FEMA.

The staff submitted the draft EP final rule package and onsite guidance documents to ACRS in support of an ACRS subcommittee briefing scheduled for November 1, 2010, and an ACRS full committee briefing scheduled for December 2, 2010. In response to SRM M091208, the staff published the draft final rule language on the NRC’s public web site (Agencywide Documents Access and Management System (ADAMS) Accession Number ML102800016) on October 8, 2010. The submittal of the EP final rule package is due to the Commission in February 2011. (W201000091)

In consultation with the Office of Nuclear Reactor Regulation (NRR), the staff performed activities that were transparent and open to stakeholders participating in the EP rulemaking process. To address the impact of the EP implementation schedule on the cumulative effect of regulations, the staff performed the following actions:

- Interacted with external stakeholders during the regulatory basis stage;
- Interacted with stakeholders during the development of the supporting guidance;
- Issued the draft guidance documents with the EP proposed rule;

- Explicitly requested public input on the implementation schedule in the EP proposed rule during the public comment period;
- Considered the comments received on the EP proposed rule implementation schedule and made the appropriate adjustments to the EP final rule; and
- Coordinated the implementation activities with FEMA.

On November 15, 2010, the staff plans to hold a public meeting with stakeholders in coordination with FEMA to discuss the implementation aspects of the final EP rule and associated guidance documents.

Initiative 2—Revision to NUREG-0654/FEMA-REP-1, Supplement 3, “Guidance for Protective Action Recommendations for General Emergencies”

The staff is enhancing offsite protective action guidance in collaboration with FEMA based on stakeholder input. On March 8, 2010, the NRC published a draft revision to NUREG-0654/FEMA-REP-1, Supplement 3 for a 75-day comment period. This period was subsequently extended for a total of 150 days based on stakeholder input and closed on August 9, 2010. In collaboration with FEMA, the NRC conducted four public meetings during the comment period to establish dialog with licensees and State and local response organizations on the proposed revision. The NRC and FEMA are currently reviewing and jointly adjudicating comments received. The revision to NUREG-0654/FEMA-REP-1, Supplement 3 is scheduled for publication in 2011 concurrently with the EP final rule.

Initiative 3—Risk-Informed/Performance-Based Emergency Preparedness Regulations

The staff initiated three projects to explore risk-informed and performance-based enhancements to the NRC’s EP regulatory regimen which are targeted for completion in 2012:

- (1) Risk Informing Regulatory Oversight of Emergency Preparedness: The staff initiated a study to identify a spectrum of representative accident scenarios that could be used to quantify the protection provided by the current EP regulatory regimen and form a basis for risk-informing regulatory oversight. This project uses techniques from the state-of-the-art reactor consequence analysis (SOARCA) and will include consideration of potential internal, external, and hostile action initiating events in the spectrum of accident scenarios.
- (2) Risk Informing Emergency Action Levels (EAL): The staff is examining the consistency of the EAL scheme currently approved by NRC in order to identify any EAL entry criteria that may need to be enhanced. For this project, the staff will use existing risk models to determine if the probability of reactor core damage for a given EAL entry criteria (plant condition) is consistent with the probability for core damage represented by other EAL entry criteria within the same emergency classification.
- (3) Performance Based Approach for Offsite Evaluation: This project will study the current methodology for evaluation of offsite EP and assess the potential for use of performance-based evaluation methodologies. Possible attributes of a performance-based oversight regimen would include greater reliance on exercise performance and

use of performance indicators. The staff has initiated discussions with FEMA staff to obtain necessary support and concurrence for proceeding with a study of performance-based techniques for evaluation of offsite response organizations and preparedness.

Initiative 4—Status of the Resolution of Medium- and Low-Priority Emergency Preparedness Rulemaking Issues (W200900090)

In SECY-06-0200, “Results of the Review of Emergency Preparedness Regulations and Guidance,” dated September 20, 2006, the staff identified eight medium- and low-priority EP rulemaking issues that the EP proposed rulemaking did not address. The staff intends to resolve these issues through a proposed revision to NUREG-0654/FEMA-REP-1 or other related guidance documents, with the exception of a license transfer issue. For this low-priority issue, the staff has determined that changes to a site’s emergency plan because of a license transfer should be evaluated under the existing regulation in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(q) and any reduction in effectiveness (RIE) should be submitted for prior NRC approval in accordance with 10 CFR 50.90, “Application for Amendment of License, Construction Permit, or Early Site Permit,” as indicated in the EP proposed rulemaking. Therefore, no additional action to address this issue is planned.

Challenges

Given the prioritization of EP activities and the need to achieve alignment with FEMA, the staff may be challenged to complete the risk-informed projects by fiscal year (FY) 2012.

Upcoming Activities

The NRC and FEMA are jointly developing an integrated transition and implementation plan for the EP final rule and guidance. The plan addresses preparations that the NRC, FEMA, NRC licensees, NRC applicants, and OROs must make to implement the new requirements. Several outreach activities (both before and after publication of the final rule) are planned to communicate expectations for the transition to, and implementation of, the new EP program requirements to external stakeholders.

The staff engaged FEMA and external stakeholders on the future initiative to revise NUREG-0654/FEMA-REP-1. In coordination with FEMA, the staff presented information at various public venues, including the NRC Regulatory Information Conference (March 2010), the National Radiological Emergency Preparedness Conference (March 2010), and the Nuclear Energy Institute (NEI) Emergency Preparedness and Communication Forum (June 2010). The NRC and FEMA have committed to maintain openness and transparency in the joint agency revision process by continuing to actively engage external stakeholders. The NRC and FEMA have formed a joint working group and have begun initial discussions on the scope of the project and the resources needed.

EMERGENCY PREPAREDNESS INSPECTION ACTIVITIES

Accomplishments

The staff conducted an in-person counterpart meeting in March 2010 with regional inspectors. This meeting provided an opportunity for an open discussion of inspection experiences and lessons learned, including significant findings and related enforcement actions, program implementation issues, and potential trends in observed licensee performance. This annual meeting supplements monthly teleconferences to maintain a strong relationship between NRC Headquarters and regional counterparts. These meetings contribute significantly toward achieving a high level of consistency in inspection activities across the regions.

Ongoing Initiatives

Initiative 1—Assessment of the Drill and Exercise Performance Indicator

The staff completed an analysis of a temporary instruction (TI) that collected data on the drill and exercise performance (DEP) indicator and initiated revisions to the EP Reactor Oversight Process inspection activities. The DEP indicator is the numerical average of a licensee's performance in making emergency event classifications, notifications, and PARs. The TI was performed in response to staff concerns that some licensees were not providing a comparable number of performance opportunities in these areas. The assessment confirmed that the staff's concerns were relevant to a minority of the sites; however, the data also indicated that a large majority of licensees were providing the appropriate number of opportunities for performance enhancement. The staff presented the results of this evaluation at the annual NEI Emergency Preparedness and Communications Forum to alert the industry to the results of the staff's analysis and, in doing so, to encourage the industry to take necessary actions to maintain the validity of the DEP indicator.

Initiative 2—Inspection Program Changes for Conformance with Emergency Preparedness Rulemaking

The staff is developing EP inspection procedures and revising Appendix B, "Emergency Preparedness Significance Determination Process," to NRC Inspection Manual Chapter 0609, "Significance Determination Process," dated March 6, 2003, to conform to the new and amended provisions of the EP final rule. In addition, the staff is developing a new inspection procedure that will focus on hostile action-based (HAB) exercise and training programs.

Initiative 3—Emergency Response Organization Performance Indicator

In response to an industry frequently asked question (FAQ), the staff is considering a proposal that seeks to give credit for the exercise performance of emergency response organization personnel assigned to a common emergency operation facility that serves multiple sites.

Challenges

The EP final rule will establish new requirements that will result in the need for licensees to make changes to their EP programs. The new requirements have varied implementation schedules. The staff is evaluating options for performing oversight of the licensees'

implementation of these requirements. The options that the staff is considering include performing a one-time inspection under a TI or relying on currently-scheduled baseline inspections. The NRC Headquarters staff will be working with its regional EP counterparts to decide upon an appropriate inspection approach.

Upcoming Activities

The staff is considering the issuance of a generic communication to clarify the NRC's expectations on licensee PAR decisionmaking. As a result of recent inspections, the staff is evaluating whether additional PAR decisionmaking guidance is necessary. The NRC held a public meeting on August 5, 2010, with stakeholders to discuss existing strategies and obtain feedback on these strategies.

EMERGENCY PREPAREDNESS LICENSING ACTIVITIES

Accomplishments

The staff completed 20 reviews of licensee submittals since the last annual report. These reviews included EAL scheme upgrades; license applications for facilities under 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material"; and license exemptions and renewals.

On June 2, 2010, the staff supported NRR in conducting an industry workshop focusing on the use of the license amendment process for the submittal of emergency plan changes determined by the licensee to constitute an RIE.

The staff participated in the ACRS meetings for the design certification of the economic simplified boiling-water reactor, the AP1000 design certification amendment, and the review of Chapter 13 of the South Texas Project combined license. The staff also supported six public meetings pertaining to the Virgil C. Summer Nuclear Station, South Texas Project, and Levy County Nuclear Power Plant combined license draft environmental impact statements; the Turkey Point Nuclear Power Generating Station environmental scoping meeting; and the proposed Victoria County Station and Public Service Enterprise Group early site permit applications.

In December 2009, the final HAB EP drill took place in response to NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events," dated July 18, 2005 (ADAMS Accession No. ML051740058), completing this 3-year initiative. On November 24, 2009, the staff issued NRC Information Notice 2009-019, "Hostile Action-Based Emergency Preparedness Drills," dated November 24, 2009 (ADAMS Accession No. ML092250360), which outlined good practices and lessons learned that the staff identified during its observations of these HAB EP drills.

The staff completed an internally focused assessment of its EAL FAQ process. A charter dated August 31, 2005 (ADAMS Accession No. ML051950112), established this process as a pilot to clarify for licensees the staff's interpretation of NRC-endorsed guidance for the development of EALs. The assessment report (ADAMS Accession No. ML102070445), recommended the formalization of the EAL FAQ process to provide clearer expectations for timely FAQ resolution and establishment of performance metrics. In addition, the assessment report recommended

that the staff evaluate the potential for expanding the FAQ process to address the interpretation of other EP regulations and guidance, based on available staff resources.

Ongoing Initiatives

Initiative 1—Hostile Action-Based Emergency Preparedness Transition

The staff continues to engage the NEI and interested stakeholders in discussing options for continuing the voluntary conduct of drills or exercises involving HAB scenarios, with the intent of building upon the knowledge and experience gained before the implementation of formal HAB exercises under the EP final rulemaking. Licensees are currently considering many different options for addressing generic and site-specific areas for improvement. On August 25, 2010, the Callaway Nuclear Generating Station, in coordination with NEI, conducted a HAB drill involving State and local response organizations to assist in validating proposed industry guidelines contained in Revision 2 to NEI 06-04, “Conducting a Hostile Action-Based Emergency Response Drill,” dated October 30, 2007 (ADAMS Accession No. ML101180290), which addresses various lessons learned identified during the recent 3-year HAB EP drill initiative.

Initiative 2—Federal Emergency Management Agency Disaster-Initiated Review Process

In coordination with FEMA, the staff is revising NRC Inspection Manual Chapter 1601, “Communication and Coordination Protocol for Determining the Status of Offsite Emergency Preparedness Following a Natural Disaster, Malevolent Act, or Extended Plant Shutdown,” dated July 7, 2005. In addition, FEMA is revising its standard operating procedure entitled, “Disaster Initiated Review (DIR).” The revisions are intended to clarify expectations for communication and coordination among agencies and to provide consistent criteria for when a DIR is warranted. The NRC and FEMA will jointly conduct outreach on the FEMA DIR process for licensees and State and local response organizations.

Initiative 3—Development of New Reactor Inspection Procedures

The staff is developing inspection procedures that the NRC will use to review, confirm, and evaluate the EP program for new reactors. This initiative includes the EP inspections, tests, analyses, and acceptance criteria and EP programmatic procedures associated with new reactor construction.

EMERGENCY PREPAREDNESS OUTREACH/COMMUNICATION ACTIVITIES

Accomplishments

In addition to holding periodic NRC/FEMA EP steering committee meetings between headquarters staff, the staff held an in-progress review conference on March 18–19, 2010, that included EP representatives from the NRC and FEMA regions. The conference provided an opportunity to update the staff on the status of significant issues and activities, obtain direct input from regions, and obtain alignment between agencies.

Consistent with the NRC Strategic Plan objectives for openness and effectiveness, the staff continues to work diligently to enhance communications with, and outreach to, various

stakeholder groups. For example, NSIR's use of web-based technology (i.e., "Live Meeting") as an agency pilot significantly enhanced stakeholder involvement in recent public meetings conducted on the proposed revision to NUREG-0654/FEMA-REP-1, Supplement 3 and has received high praise from the radiological EP community. The White House recognized the NRC's use of this web-based conferencing for public meetings in the Open Government Initiative Innovations Gallery.

To further strengthen the NRC's focus on stakeholder involvement, the staff continues to publish a periodic EP newsletter to enhance communication with both internal and external stakeholders on important EP issues, initiatives, and upcoming public meetings and conferences. The newsletter continues to be an important communications tool, allowing the staff to target specific groups such as nongovernmental organizations.

In coordination with FEMA, the staff developed and hosted a multiagency tabletop exercise on December 16, 2009, called "Reliable Comment 2009" (RC09). RC09 focused on the challenges of aligning critical information (message flow) and event communications related to a postulated hostile action incident and an accident involving multiple system/equipment failures at the Palo Verde Nuclear Power Station. RC09 participants included senior officials from the NRC and FEMA headquarters and affected regions, the U.S. Department of Homeland Security (DHS), the Federal Bureau of Investigation, the U.S. Department of Energy, NEI, the State of Arizona, Maricopa County in Arizona, and the Palo Verde Nuclear Power Station. In addition, the NRC hosted a series of workshops on October 15 and 29, 2009, to review and discuss agency responsibilities and operational response issues in preparation for the tabletop exercise. RC09 was successful in aligning and verifying both operational and public messaging responsibilities for a nuclear power plant incident and highlighted the need to continue the development of interagency working relationships. DHS issued an after-action report based on input that it received from participating agencies.

Ongoing Initiatives

Initiative 1—Emergency Risk Communication and Message Mapping Guidance

The staff provided extensive outreach to industry and State and local stakeholders on message development and message mapping to support the publication of guidance. The staff also presented information and provided workshops at several forums, including the Annual Health Physics Society Meeting, the NRC Regulatory Information Conference, the National Radiological Emergency Preparedness Conference, and the NEI Emergency Preparedness and Communication Forum.

To enhance risk communications for nuclear power plant licensees and OROs, the staff is planning to publish the following guidance documents as NUREG/CRs by November 2011:

- "Guidance on Developing an Emergency Risk Communications (ERC)/Joint Information Center (JIC) Plan for a Radiological Emergency," Volume 1, will contain templates for use or adaption in the development of ERC and JIC plans for a radiological emergency.
- "Guidance on Developing Effective Radiological Risk Communication Messages: Effective Message Mapping and Risk Communication with the Public in Nuclear Plant

Emergency Planning Zones,” will contain principles, strategies, and tools for the development of messages for radiological emergencies.

Initiative 2—Engagement of Emergency Preparedness Professional Organizations

The staff continues to interact with the public by attending national and regional meetings that attract a diverse group of EP professionals and stakeholders. The staff has actively engaged the emergency management community through such organizations as the National Emergency Management Association, International Association of Emergency Managers, and Conference of Radiation Control Program Directors to further enhance active participation in developing proposed changes to EP regulations and guidance. Specifically, the staff is focusing on the newly established radiological EP subcommittee of the National Emergency Management Association to assist in reaching out to State emergency management directors on items of mutual interest and in obtaining valuable stakeholder insights on current and EP proposed regulatory initiatives.

Initiative 3—Integrated Communications Strategy

The staff is currently working with FEMA to develop an integrated communications strategy that considers various ongoing and EP proposed rulemaking and guidance changes to facilitate the effective communication and understanding of the overall impact on external stakeholders.

Upcoming Activities

In coordination with FEMA, the staff is developing communication plans to support planned public meetings on the implementation of the EP final rule and revision to NUREG-0654/FEMA-REP-1.