

NEI 11-03, Emergency Preparedness Frequently Asked Questions Process (Draft)

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NEI 11-03, Rev. 0 - Purpose

Provide an organized forum for licensees and the NRC to resolve generic questions concerning the implementation of emergency preparedness requirements in a collaborative and coordinated context

Need for NEI 11-03

- **Most expansive EP rule changes since TMI**
- **Significant program changes involving several new guidance documents**
- **There needs to be a sanctioned process to develop interim policy to ensure consistent implementation and inspection**
- **NEI 11-03 Rev. 0 needs to be endorsed in concert with the implementation of the new rule and guidance**
 - **In place at the time of the joint NRC/FEMA Workshops**

EPFAQ Process Overview

- **Two existing processes for endorsing FAQs:**
 - **NEI 05-10, Rev. 2, Security FAQ Process**
 - **NEI 99-02, Regulatory Assessment Performance Indicator Guideline, Appendix E, Rev. 6**

EPFAQ Criteria

- **To be considered as an EPFAQ, a question must be:**
 - **Generic in nature**
 - **Does not involve unresolved inspection issues, enforcement actions or other situations covered by existing regulatory processes**
 - **Does not provide interpretation of regulation or unpublished guidance**
 - **The resolution should facilitate consistent implementation of industry or NRC EP guidance**

Composition of EPFAQ Panels

- **Industry panel**
 - NEI representative
 - Industry representatives representing diverse experience on EP matters
- **NRC panel**
 - NRC representatives with EP expertise
- **Joint panel**
 - Members of Industry and NRC panels

Process Overview

- **Industry and NRC Panels**
 - Perform initial screening against criteria
- **Joint Panel**
 - Draft a response that is acceptable to both panels
 - Joint panel interaction conducted in a public setting

Open Issues

- **What level of NRC approval is appropriate?**
 - **Ensure concurrence by other NRC departments and EP coordination**
- **FEMA involvement**
 - **NUREG 0654, Supplements 3 and 4**
 - **Hostile Action-Based Exercise Implementation**

Path Forward

- **Milestones to achieve endorsement**
 - Incorporate comments from March 1st meeting
 - Additional public meeting(s) to revise the draft document – April 2011
 - Revision 0 submitted to the NRC - May 2011
 - If necessary, schedule another public meeting to review NRC comments
 - Endorsement - November 2011 (or by when EP Rule is published in the Federal Register)

NEI 99-01, Rev. 6

Keith Kemper
Exelon Nuclear



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- **Submitted on January 21, 2011**
- **Industry Lead- Keith Kemper**
- **Preparation Team**
 - **Team Leader: David Young – NextEra Energy/Seabrook Station**
 - **Larry Baker – Exelon Nuclear/Corporate**
 - **Craig Banner – PSEG Nuclear/Salem and Hope Creek Nuclear Generating Stations**
 - **John Egdorf – Dominion Generation/Kewaunee Power Station**
 - **Jack Lewis – Entergy Nuclear/Corporate**
 - **C. Kelly Walker – Operations Support Services, Inc.**

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■ Review Team

- Chris Boone – Southern Nuclear/Corporate
- Kent Crocker – Progress Energy/Brunswick Nuclear Plant
- Don Crowl – Duke Energy/Corporate
- Gerry Holthaus – Xcel Energy/Monticello Nuclear Generating Plant
- John Kaminski – Constellation Energy/Nine Mile Point Nuclear Station
- Walt Lee – TVA Nuclear/Corporate
- Jay Maisler – Enercon Services, Inc.
- Scott McCain - Emergency Planning Technical Consultants, Inc.
- Ken Meade – FENOC/Corporate
- David Stobaugh – EP Consulting, LLC
- Nick Turner – STARS/Callaway Plant
- Maureen Zawalick – STARS/Diablo Canyon Power Plant

NEI 99-01, Rev. 6

- **Development Inputs**
 - **EAL FAQs from Rev. 5**
 - **Approved**
 - **Deferred**
 - **RAI material from Rev. 5 Submittal**
 - **Operating Experience**
 - **Industry comments**
 - **NEI comments**
 - **NRC comments**

NEI 99-01, Rev. 6

- **Development Goals for Rev. 6**
 - **Clearly written and internally consistent**
 - **Contains all guidance necessary for implementation**
 - **Guidance sufficient to promote consistent application across the industry**
 - **Bring document up to current NEI standards – format and readability**

NEI 99-01, Rev. 6

- **Development Goals for Rev. 6 (cont.)**
 - **Define ECL Attributes**
 - **Develop a set of risk and/or consequence attributes for each ECL**
 - **Align ICs with ECL Attributes**
 - **Documented the ECL attribute for each IC in the associated Developer Note**
 - **Split-out Developer Notes from Basis**
 - **Improve the quality of the Developer Notes**

NEI 99-01, Rev. 6

- **Development Goals for Rev. 6 (cont.)**
 - **Incorporate new/recent regulatory language and references**
 - **Re-align IC numbering and close numbering gaps**
 - **Provide comprehensive documentation and justification of changes and their bases**
 - **Create a detailed Change Summary and submit with Rev. 6**

NEI 99-01, Rev. 6

- **Changes to address NRC letter dated 10/12/10 (ML102810405) included:**
 - **Alternate seismic EALs**
 - **Alternate digital I&C EALs (for USEPR)**
 - **Revised front sections of document to eliminate redundancy and inconsistency**
 - **Eliminated UE ICs that were not a direct precursor to a more significant event or fall under the scope of 10 CFR 50.72**

NEI 99-01, Rev. 6

- **Risk-Informed EAL Study**
 - **Recommend that the NRC staff use Rev. 6 as a baseline for its risk-informed EAL project scheduled to begin in 2011**

NEI 99-01, Rev. 6

- **Importance of R6**
 - **Addresses NRC Management comments in EPWG meetings and letter dated 10-12-10**
 - **Current guidance requires licensees to make classifications not aligned with ECL attributes**
 - **Improves public and stakeholder confidence**

NEI 99-01, Rev. 6

- **Summary of Changes**
 - **Standardized terms (e.g., Safety-Related)**
 - **Defined ECL attributes**
 - **Aligned Hazard EALs with ECLs**
 - **NUE exceeds design limits**
 - **Alert impacts safety-related structure or multiple trains or systems**

NEI 99-01, Rev. 6

- **Summary of Changes (cont.)**
 - **Change summary discusses and provides justification for all changes**
 - **Expanded guidance on making classifications**
 - **A number of ICs/EALs have been subsumed by other ICs/EALs**
 - **A number of ICs/EALs did not meet ECL attributes**

NEI 99-01, Rev. 6

- **Summary of Changes (cont.)**
 - **A number of ICs/EALs are within the scope of 10 CFR 50.72**
 - **Recognition Category D – carried over changes from other Recognition Categories**
 - **Fission Product Barrier**
 - **Containment loss/potential loss thresholds are only used for escalation**

NEI 99-01, Rev. 6

- **Summary of Changes (cont.)**
 - **Fission Product Barrier (cont.)**
 - **Guidance better accommodates all PWR designs**
 - **Consolidated and simplified PWR thresholds**
 - **Improved guidance for determining a loss or potential loss of the containment barrier**

NEI 99-01, Rev. 6

- **Summary of Changes (cont.)**
 - **Revised ATWS EALs for Alert and SAE to align with design considerations and existing basis**
 - **Enhanced RCS leakage EAL**
 - **Align leakage with TS definitions**
 - **Added 15 minute duration**
 - **Enhanced definitions to add clarity**

Open Items

- **IC HS1, HOSTILE ACTION within the PROTECTED AREA, requires SAE declaration**
 - Industry believes that a SAE declaration is warranted only for a Direct Armed Attack or aircraft impact on the Plant Protected Area
 - A range of security-related events could lead Security Supervision to declare a HOSTILE ACTION
 - A SAE may not be appropriate for some HOSTILE ACTION events (over-classification)
 - All other HOSTILE ACTIONS should be an Alert
 - Possible solutions

Path Forward

- **Industry will support public meetings and RAI process**
- **Incorporate additional NRC insights**
- **Suggested schedule**
 - **Historical approval time has been 1 year**
 - **Letter by December 31, 2011 followed by RG 1.101 endorsement, if needed**

NEI 99-01, Rev. 6

- **Questions and Discussion**

NEI 07-01, Rev. 1

Martin Hug



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NEI 07-01, Rev. 1

- **The need**
 - **Implement NEI 99-01, R6 improvements**
 - **Implement changes to design documents**

Path Forward

- **Revise NEI 07-01 using NEI 99-01, R6 as a template**
- **Submit once NEI 99-01, R6 is endorsed**
- **Endorsement needs to support operational schedule**
 - **Reverse chronological steps identifies endorsement date**
 - **June, 2012**
 - **Fuel load, ITAAC, License Operator training, NRC approval site specific implementation, change commitment to Rev. 1, NRC endorse NEI 07-01**

NEI 07-01, Rev. 1

Questions and Discussion