



Via Electronic Mail

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USNRC

August 4, 2011 (9:15 am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

July 26, 2011

Annette L. Vietti-Cook, Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attention: Rulemakings and Adjudications Staff

**Subject: NRDC's Petition For Rulemaking to require more realistic training  
on Severe Accident Mitigation Guidelines.**

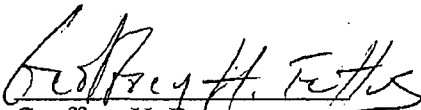
Dear Madam Secretary:

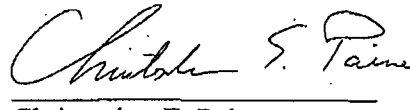
Pursuant to 10 C.F.R. § 2.802, the Natural Resources Defense Council, Inc. ("NRDC") hereby petitions the U.S. Nuclear Regulatory Commission ("NRC") to institute a rulemaking to amend the regulations applicable to nuclear facilities licensed under 10 C.F.R. § 50, § 52 and other applicable regulations.

The rationale and the bases for this petition can be found in the NRC Staff report, Charles Miller, et al, "Recommendations for Enhancing Reactor Safety in the 21<sup>st</sup> Century: The Near Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," SECY-11-0093, July 12, 2011. We look forward to providing NRC with additional technical support for this petition after this petition has been accepted and docketed.

Please do not hesitate to contact us at (202) 289-6868 if you have any questions. NRDC appreciates your prompt consideration of this matter.

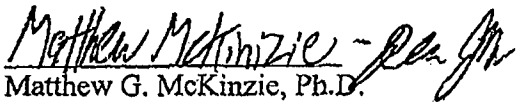
Sincerely,


  
Geoffrey H. Fettus  
Senior Project Attorney

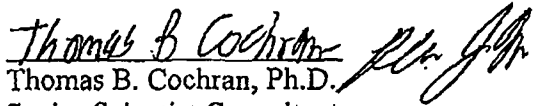
  
Christopher E. Paine  
Director, Nuclear Program

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Wade Greene Chair for Nuclear Policy

CC:

The Honorable Gregory B. Jaczko, Chairman  
The Honorable George Apostolakis  
The Honorable William D. Magwood, IV  
The Honorable William C. Ostendorff  
The Honorable Kristine L. Svinicki

### **Proposed Actions**

NRDC requests that the Nuclear Regulatory Commission ("NRC") institute a rulemaking proceeding applicable to nuclear facilities licensed under 10 C.F.R. § 50, § 52 and other applicable regulations to require more realistic, hands-on training and exercises on Severe Accident Mitigation Guidelines (SAMGs) and Extreme Damage Mitigation Guidelines (EDMGs) for all staff expected to implement the strategies and those licensee staff expected to make decisions during emergencies, including emergency coordinators and emergency directors.

### **Rationale for the Rulemaking Petition**

The rationale for this rulemaking petition is found in the NRC Staff report, Charles Miller, et al, "Recommendations for Enhancing Reactor Safety in the 21<sup>st</sup> Century: The Near Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," SECY-11-0093, July 12, 2011. See particularly, Section 4.2.5, pp. 46-50 regarding the strengthening and integration of onsite emergency response capabilities such as emergency operating procedures (EOPs), SAMGs, and EDMGs.

### **Statement of Interest**

NRDC is a national non-profit membership environmental organization with offices in Washington, D.C., New York City, San Francisco, Chicago, Los Angeles and Beijing. NRDC has a nationwide membership of over one million combined members and activists. NRDC's activities include maintaining and enhancing environmental quality and monitoring federal agency actions to ensure that federal statutes enacted to protect human health and the environment are fully and properly implemented. Since its inception in 1970, NRDC has sought to improve the environmental, health, and safety conditions at the nuclear facilities licensed by NRC and its predecessor agency.