



Proposed Revision to Emergency Preparedness Significance Determination Process

Public Meeting
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Agenda

- History of revision to date.
- Review of major reformatting and editorial changes.
- Review of technical changes to EP SDP.
- Future steps.

Note

- Because of the large number of editorial and formatting changes made to the document, a strike-in / strike-out version is not being provided.
- However, significant technical changes, are (and will be) highlighted in red, consistent with the practice used in inspection procedures.
- This is a pre-decisional draft subject to change.

History

- Started several years ago to:
 - improve clarity and ease of use
 - address experiences from inspector and HQ usage
 - reflect EP Rule Changes
 - reflect use of SDP for traditional enforcement findings

Formatting Changes

- Used matrix table for examples.
- Used block format for planning standard discussions.
- Broke down lengthy paragraphs.
- Added logic charts.
- Followed inspection manual style/format.
- Relocated tutorial text to IMC 0308, *Technical Bases*.

Editorial Changes

- Improve consistent use of terminology.
- Changed lengthy paragraphs into subparagraphs & lists.
- Put most defined phases in a single section.
- Reduced definitions to their fundamental essence.
- Reduced the number of capitalized phrases in the text to improve readability.
- Other miscellaneous changes

Technical Changes

Definitions

- New Definitions:
 - emergency plan
 - Emergency Response Organization (ERO)
 - Offsite Response Organization (ORO)
 - compensatory measures
 - mitigating factors

Definitions

- Modified Definitions:
 - regulatory requirement
 - failure to comply and failure to implement
 - weakness
- Other definitions wordsmithed

New Chapter 3

- Added entry conditions:
 - now addresses traditional enforcement violation that is a performance deficiency
 - provides guidance on addressing findings in other cornerstones that affect EP cornerstone
- Step-by-step general instructions:
 - handling of non-planning standard violations
 - branch to Chapter 4.0, *Failure to Implement*
 - branch to Chapter 5.0. *Failure to Comply*

Chapter 4 –Failure to Implement

- Added guidance on:
 - timeliness issues
 - missed or delayed declarations
 - over-classified emergency level
- Step-by-step instructions on significance.
- Attachment 1 logic chart re-drawn, same logical outcome as previous Sheet 2

Chapter 5 – Failure to Comply

- Added guidance on:
 - use of examples
 - crediting mitigating factors
 - performance deficiency which occurred more than three years in the past
 - unavailability of equipment or facilities
 - crediting compensatory measures
- Step-by-step instructions on significance.
- Attachment 1 logic chart re-drawn, same logical outcome as previous Sheet 2

New Chapter 7

- New section to provide guidance on traditional enforcement violations relevant to EP.
- Intended to be EP-specific “road-map” to, but does not replace:
 - MC0612
 - NRC Enforcement Policy

Future Steps

- EP SDP will be presented to regional inspectors at the counterpart meeting in September.
- Comments received from industry and the inspectors will be resolved.
- EP SDP will be forwarded to NRR for processing as a manual chapter.
- MC0308, *Technical Basis*, will be updated.

Rest of discussion will use the EP SDP
rather than slides.