

FOIA Resource

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Subject: WWW Form Submission

FOIAPA REQUEST
Case No.: 2012-0059
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Specialist: McCallister
Related Case: _____

Below is the result of your feedback form. It was submitted by
() on Tuesday, November 15, 2011 at 13:28:14

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Desc: All records dealing directly with Severe Accident Management Guidelines (SAMGs) and Emergency Procedure Guidelines (EPGs) for boiling water reactors (BWRs) including documents obtained by NRC Technical Training Center instructors James McHugh and David Lochbaum during the BWROG conference conducted in July 2009 in Charlotte, NC. These records include Revision 3 to the BWROG Severe Accident Guidelines and Revision 3 to the Emergency Procedure Guidelines, including all appendices.

This request does not seek documents that merely reference the SAMGs/EPGs/SAGs such as emergency operating procedures, NRC inspection procedures, and the like.

FeeCategory: Educational

MediaType:

FeeCategory_Description:

Expedite_ImminentThreatText:

Expedite_UrgencyToInformText:

Waiver_Purpose: The NRC's Near Term Task Force (NTTF) recommended that NRC provide additional oversight of and internal training on SAMGs/EPGs/SAGs. These documents are not publicly available. UCS seeks these records so as to prepare ourselves for public meetings announced by the NRC regarding the merits and implementation of NTTF's recommendations. In addition, the requested records will aid UCS in our evaluation of what worked well during the response to the Fukushima accident and what did not work well, from a SAMG/EPG/SAG perspective.

Waiver_ExtentToExtractAnalyze: UCS expects to review the requested documents and evaluate whether steps proposed by the NRC to implement the NTTF recommendations overlap or at least match up so as to prevent seams that future events could exploit, leading to another nuclear plant disaster.

Waiver_SpecificActivityQuals: I (Lochbaum) worked for the NRC as a BWR technology instructor. My duties included teaching the SAMGs to NRC employees in initial and requalification training. UCS has the qualifications to understand the information in the SAMG/EPG/SAG documents, but the documents are not publicly available. With the records requested, UCS will be able to constructively comment on the NRC's proposals to implement NTTF recommendations. In addition, UCS will be able to review the SAMGs/EPGs/SAGs to identify any additional measures that could complement or supplement the NTTF recommendations. For example, if the SAMGs/EPGs/SAGs have a step regarding hydrogen control, UCS will be able to evaluate whether the instrumentation available to the operators is sufficient for them to make informed decisions.

Waiver_ImpactPublicUnderstanding: The NTTF recommended enhanced oversight of SAMGs/EPGs/SAGs to lessen the vulnerability of US reactors to Fukushima-styled disasters. Upcoming discussions are very likely to include dialogues between NRC staff and industry representatives over topics like whether the B.5.b equipment as-is enables necessary steps in the SAMGs/EPGs/SAGs to be conducted. With the requested documents, UCS can provide constructive commentary on the emergency procedure steps and how they will direct operators to use available equipment. Absent public access to the requested documents, the public is essentially reduced to listening to a discussion held behind a curtain.

Waiver_NatureOfPublic: The size and nature of the public interested in this topic is reflected in the NRC's use of webstreaming public meetings conducted first by the NTTF and later by the NRC staff and NRC Commission to discuss the NTTF report. There is considerable interest across the country in the measures being proposed to reduce vulnerabilities at US reactors. The requested documents are a key component of these proposed measures. The requested documents will help citizens and local officials across the country understand this aspect of the heightened protection.

Waiver_MeansOfDissemination: UCS will very likely reference the requested documents in (a) testimony before the US Congress, (b) presentations to the NRC Commission and staff, and (c) reports and issue briefs posted to our website, www.ucsusa.org.

Waiver_FreeToPublicOrFee: While UCS encourages people to join UCS (e.g., pay annual dues), the information posted to the nuclear safety webpages of our website are available for free viewing/downloading.

Waiver_PrivateCommericalInterest: None.
