

NTTF Recommendation 8

Onsite Emergency Response Capabilities

February 15, 2012

NTTF Recommendation 8

The Fukushima Near-Term Task Force (NTTF) Recommendation 8 endorsed the strengthening and integration of emergency operating procedures (EOPs), severe accident management guidelines (SAMGs), and extensive damage mitigation guidelines (EDMGs) using the rulemaking process.

NTTF Recommendation 8

- In SECY-11-0137 the NRC staff recommended that the NRC, as a near-term action, undertake regulatory actions to resolve NTTF Recommendations 8.1, 8.2, 8.3 and 8.4 which include:
 - Issue an Advanced Notice of Proposed Rulemaking (ANPR) to engage stakeholders in rulemaking activities associated with the methodology for integration of onsite emergency response processes, procedures, training and exercises.
 - Interact with stakeholders to inform the modification of EOP generic technical guidelines to include guidance for SAMGs and EDMGs in an integrated manner and to clarify command and control issues as appropriate.

Regulatory Approach

- Use standard rulemaking process to address Recommendation 8.
- No current plans for an initial Commission Order
 - Rulemaking must be responsive to the strategies developed as a result of other NNTF recommendation efforts.
- Solicit stakeholder input for the development of an approach to integrated onsite emergency response capability.
- Encourage Industry Owners Groups to lead the effort to standardize and integrate accident mitigating procedures.
- Interact with other NNTF recommendation teams to ensure that approach is well coordinated and final product is coherent and comprehensive.

Rulemaking Process - ANPR

- The NRC will issue an Advanced Notice of Proposed Rulemaking (ANPR)
 - To engage stakeholders in rulemaking activities associated with the methodology for integration of onsite emergency response processes, procedures, training and exercises
 - ANPR is scheduled to be published in the *Federal Register* and regulations.gov by May, 2012
 - The ANPR will have a 45 day comment period
 - A public meeting will be held during the comment period to answer questions about the ANPR
 - Responses and comments will be used to develop the Regulatory Basis
- **NRC Docket ID: NRC-2012-0031**

Rulemaking Process – Reg Basis

- The Regulatory Basis (Reg Basis) provides the basis for making informed decisions during the rulemaking process
- The draft Reg Basis is scheduled to be published in the *Federal Register* and regulations.gov during the first quarter of 2013
 - The draft Reg Basis will have a 45 day comment period
 - A public meeting will be held during the comment period to answer questions about the draft Reg Basis
- The final Reg Basis will be published in the *Federal Register* in June, 2013
 - Comments on the Reg Basis will be used to develop the proposed rule
 - The NRC will respond to the comments in the proposed rule

Rulemaking Process

Proposed Rule

- The proposed rule
 - Contains draft rule language
 - Describes the technical, legal, and policy information that supports the proposed rulemaking
- The proposed rule should be published in the *Federal Register* and regulations.gov in the fourth quarter of 2014
 - The proposed rule will have a 75 day comment period
 - All draft supporting documents will be issued with the proposed rule
 - A public meeting will be held during the comment period to answer questions about the proposed rule and supporting documents

Rulemaking Process

Final Rule

- The final rule contains
 - Final rule language
 - Bases for the changes to regulations
 - NRC responses to public comments received on the proposed rule
- The final rule should be published in the *Federal Register* and in regulations.gov in the third quarter of 2016
 - All final supporting documents will be issued with the final rule
 - A public meeting may be held before the issuance of the final rule to obtain feedback on the proposed implementation dates of any new regulatory requirements

Petition for Rulemaking

PRM 50-102

- **Petitioner:** Natural Resources Defense Council, Inc.
- **Date Docketed:** July 28, 2011
 - **NRC Docket ID:** NRC-2011-0189
- **Date Noticed in *Federal Register*:** September 20, 2011 (76 FR 58165)
 - The FRN only stated receipt of the petition. No public comment period was provided.
- The petitioner's request is quoted directly from Recommendation 8.4 of the Fukushima NTTF Report (SECY-11-0093)
- The NRC is currently evaluating the petition.
 - A Petition Review Board will held in late February or early March to resolve the petition

- EOPs address design basis accidents and are required by 10 CFR Part 50, Appendix B, Criterion V and Technical Specifications.
- SAMGs provide guidance for beyond design basis events and are the result of a voluntary industry initiative.
- Post 9/11 requirements of 10 CFR 50.54(hh)(2) resulted in the development of EDMGs to address large area emergencies.

Current Status

Onsite Emergency Response Capabilities

- The existing accident mitigating procedures (EOPs, SAMGs and EDMGs) have been developed as separate initiatives with varying degrees of integration between procedures.
- The format and procedure control of SAMGs differ throughout the industry.
- Industry approaches to training, qualification and exercises for SAMGs and EDMGs are not standardized.

NRC Working Group Objectives

- Ensure that effective transitions are developed between the various accident mitigating procedures so that overall strategies are coherent and comprehensive.
- Ensure that command and control strategies for large scale events are well defined in order to promote effective decision-making at all levels and develop organizational flexibility to respond to unforeseen events.
- Ensure that key personnel relied upon to implement these procedures and strategies are trained, qualified and evaluated in their emergency response roles.
- Ensure accident mitigating procedures, training and exercises are standardized throughout the industry.

NRC Working Group Objectives

Ultimately, NTTF Recommendation 8 is the opportunity to provide reasonable assurance that, if a beyond design basis event occurs, the strategies for severe accident mitigation developed as a result of NTTF recommendations and previous regulatory efforts can be effectively implemented.

Focus Items

Accident Mitigating Procedures

- Identify current level of integration between accident mitigating procedures.
- Establish effective transitions to enhance procedure integration.
- Determine best approach for upgrading and standardizing technical guidelines.
- Extend guidance to address strategies developed as a result of other NNTF efforts.
- Prevent any adverse impact on current EOP strategies and training requirements.

Focus Items

Command and Control

- Establish a command and control strategy to address events that progressively increase in severity past design basis assumptions.
- Ensure a formal approach to defining roles and responsibilities as they are transferred.
- Match the command and control strategy with the enhanced capabilities resulting from NTTF efforts.
- Ensure the command and control strategy is standardized throughout the industry.

Focus Items

Training and Qualifications

- Identify key personnel responsible for implementing accident mitigating strategies.
- Develop an appropriate level of continuing training requirements and qualifications for key personnel.
- Standardize continuing training requirements.
- Identify additional knowledge requirements for licensed operators.

Focus Items

Exercises

- Identify requirements for exercises to ensure onsite emergency response capabilities can be evaluated:
 - Develop drills that address new coping strategies
 - Define periodicity within current 8-year cycle
 - Determine the appropriate length/depth of an onsite emergency response capability drill
 - Identify key evaluation parameters to assess performance

Industry Insights and Questions

Public Insights and Questions

Closing Remarks

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