May 15, 2012

Susan Perkins-Grew, Director
Emergency Preparedness
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, DC 20006-3708

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION REVIEW OF NEI 12-01, "GUIDELINE FOR ASSESSING BEYOND DESIGN BASIS ACCIDENT RESPONSE STAFFING AND COMMUNICATIONS CAPABILITIES," REVISION 0, DATED MAY 2012

Dear Ms. Perkins-Grew:

I am responding to your letter of May 3, 2012, (Agencywide Documents Access and Management System (ADAMS Accession No. ML12125A411), requesting U.S. Nuclear Regulatory Commission (NRC or the Commission) review and endorsement of Nuclear Energy Institute (NEI)-12-01, Revision 0, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," dated May 2012 (ADAMS Accession No. ML12125A412). This version of NEI 12-01 superseded a draft previously submitted for NRC staff review dated April 18, 2012, and is proposed for licensee use in responding to the requests for information under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(f) regarding the NRCs Near-Term Task Force (NTTF) Recommendation 9.3, dated March 12, 2012 (ADAMS Accession No. ML12053A340).

In SECY-11-0137, "Prioritization of Recommended Actions to be Taken in Response to Fukushima Lessons Learned" (ADAMS Accession No. ML11269A204), NRC staff provided proposed prioritization of the NTTF recommendations to the Commission. In the resulting staff requirements memorandum (SRM) dated December 15, 2011 (ADAMS Accession No. ML113490055), the Commission approved the staff's recommended prioritization, subject to direction provided in SRM-SECY-11-0124, "Staff Requirements-SECY-11-0124 Recommended Actions to be Taken without Delay from the Near-Term Task Force Report," dated October 18, 2011 (ADAMS Accession No. ML112911571). Recommendation 9.3 of the NTTF report addresses maintaining power to communication systems during a prolonged station blackout (SBO) and having the onsite and augmented staff to respond to a multi-unit event with a loss of all alternating current power and impeded access to the site. This recommendation was prioritized to be addressed without unnecessary delay. The March 12, 2012, Request for Information asked that licensees assess their current communications system and equipment under conditions of onsite and offsite damage and prolonged SBO and perform a staffing study to determine the number and qualifications of staff required to fill all necessary positions in response to a multi-unit event.

A series of public meetings was held during the development of the Requests for Information and the subsequent guidance development. Specifically, February 7, 2012, and March 5, 2012, meetings were held to discuss with industry and stakeholders the implementation guidance for Recommendation 9.3.

The NRC's defense-in-depth strategy includes multiple layers of protection: (1) prevention of accidents by virtue of the design, construction, and operation of a plant, (2) mitigation features to prevent radioactive releases should an accident occur, and (3) Emergency Preparedness (EP) programs. Thus, if prevention and mitigation are not successful in averting the release of radioactive materials from the plant, EP provides additional defense in depth in the protection of public health and safety. The accident at Fukushima reinforced the need for effective EP, the objective of which is to ensure the ability to use adequate measures to mitigate the consequences of a radiological emergency. The accident at Fukushima also highlighted the need to determine the number and qualifications of staff required to fill all the positions necessary to respond to a multi-unit event. Finally, the accident at Fukushima illustrated a need to ensure that a plant can power the communication equipment relied upon to coordinate the event response during a prolonged SBO. Based upon this criterion, the NRC has completed an extensive review of NEI-12-01, which was revised to address staff comments and recommendations offered during a series of public meetings. The staff has reviewed NEI-12-01, Revision 0, dated May 2012, and has found this guidance to be an acceptable method for licensees to employ when responding to the 10 CFR 50.54(f) letters regarding NTTF Recommendation 9.3.

We would like to thank NEI for its effort to develop a guidance document that will assist the industry in responding to the 10 CFR 50.54(f) letters.

Sincerely,

/RA/

David L. Skeen, Director
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulations

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