

NTTF Recommendation 8

Onsite Emergency Response Capabilities

May 23, 2012

Meeting Ground Rules

- Limit interruptions:
 - Turn off cell phones
 - Minimize side conversations.
- Speak one at a time.
- Identity yourself when speaking
- Be respectful of other speakers/participants.
- If participating by webinar please use the:
 - Chat function to send questions or
 - Ask questions via the bridgeline at the designated opportunities.

Background

- Commission direction:
 - Initiate rulemaking with an advance notice of proposed rulemaking (ANPR) in SRM-SECY-11-0124
 - Strengthen and integrate emergency operating procedures (EOPs), severe accident management guidelines (SAMGs), and extensive damage mitigation guidelines (EDMGs).
- NRC staff held a public meeting on February 15, 2012, to obtain public feedback on the proposed regulatory process and schedule.

Recommendation 8 Status

- The NRC published the Recommendation 8 ANPR on April 18, 2012
 - 3 comments received on ANPR so far
 - Comments can be submitted by using the regulations.gov website or by e-mailing them to Rulemaking.Comments@NRC.gov
 - Please include the NRC Docket ID (**NRC-2012-0031**) in your comments
- ANPR comment period ends June 18, 2012.

Next Steps

- The NRC staff will develop the regulatory basis once the comment period closes.
 - The draft regulatory basis will be issued for public comment by the end of 2012.
- Will follow typical rulemaking schedule:
 - Final Regulatory Basis in 1st quarter of 2013.
 - Proposed Rule in 4th quarter of 2014.
 - Final Rule in 3rd quarter of 2016.
- Any new or revised guidance documents will be provided with the proposed and final rules.

ANPR Questions

Regulatory Approach

- What is the preferred regulatory approach to address NTF Recommendation 8?
- Should the NRC develop a new rule or could the requirements that would provide for a more strengthened and integrated response capability be accomplished by a method other than a rulemaking?
- If a new rule is developed, what type of supporting document would be most effective for providing guidance on the new requirements?
- Should the NRC use other regulatory vehicles (such as commitment letters or confirmatory action letters) to put in place interim coping strategies for onsite emergency response capabilities while rulemaking proceeds?

ANPR Questions

Accident Mitigating Procedures

- Should the SAMGs be standardized throughout the industry?
- What is the best approach to ensure that procedural guidance for beyond design basis events is based on sound science, coherent, and integrated? What is the most effective strategy for linking the EOPs with the SAMGs and EDMGs?
- The NTTF Recommendation 8 strongly advised that the plant owners' groups should undertake revision of the accident mitigating procedures to avoid having each licensee develop its own approach. Is this the best course of action? What additional scenarios or accident plans should be considered for addition to SAMG technical guidelines as a result of the lessons learned in Japan?

ANPR Questions

Accident Mitigating Procedures

- How should the November 2011 INPO report, INPO-11-005 be used by industry in developing SAMGs and the NRC in developing any proposed regulatory changes?
- Should there be a requirement that the SAMGs and EDMGs be maintained as controlled procedures in accordance with licensee quality assurance programs?
- Should the SAMGs and the EDMGs be added to the “Administrative Controls” section of licensee technical specifications?

ANPR Questions

Accident Mitigating Procedures

- The NRC Advisory Committee on Reactor Safeguards (ACRS) recommended that Recommendation 8 be expanded to include fire response procedures. Should efforts to integrate the EOPs, SAMGs, and EDMGs include fire response procedures? Are there other procedures that should be included in the scope of this work?
- What level of effort, in terms of time and financial commitment, will be required by the industry to upgrade the accident mitigating procedures?

ANPR Questions

Command and Control

- Should separate procedures be developed that clearly establish the command and control structures for large-scale events?
- Should the command and control approach be standardized throughout the industry or left for individual licensees to define?

ANPR Questions

Training, Qualifications and Exercises

- Should a systems approach to training be developed to identify key tasks that would be performed by the various roles identified in the new strategies?
- Should the current emergency drill and exercise requirements be revised to ensure that the strategies developed as a result of this ANPR will be evaluated in greater depth?
- Should the revised accident mitigating procedures, specifically SAMGs and EDMGs, be added to the knowledge and abilities catalogs for initial reactor operator licenses?

ANPR Questions

Training, Qualifications and Exercises

- What level of plant expertise should be demonstrated by the personnel assigned to key positions outlined by the accident mitigation guidelines and command and control strategy?
- What training requirements should be developed to ensure that emergency directors and other key decision-makers have the command and control skills needed to effectively implement an accident mitigation strategy?
- What should the qualification process entail for key personnel identified in the new strategies?

ANPR Questions

Other NTTF Recommendations

- What is the best regulatory structure for integrating the onsite emergency response capability requirements with other post-Fukushima regulatory actions?
- What is the best way to integrate station blackout regulatory actions (Recommendation 4.1) and mitigation strategies (Recommendation 4.2) for beyond design basis external events with the Recommendation 8 efforts to ensure that they account for the others' requirements, yet do not unduly overlap or inadvertently introduce redundancy, inconsistency, or incoherency?

ANPR Questions

Other NTTF Recommendations

- Should staffing levels change as a result of a revised onsite emergency response capability or should these duties be assigned to existing staff (Recommendation 9.3)?
- Recommendation 10.2 addresses command and control structure and qualifications for the licensee's decision-makers for beyond design basis events. Should this recommendation be addressed concurrently with Recommendation 8?
- It will take several years to issue a final rule so should the NRC use other regulatory vehicles (such as commitment letters or confirmatory action letters) to put in place interim coping strategies for onsite emergency response capabilities while rulemaking proceeds?

Additional Questions

Closing Remarks

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