

**ANPR 50 and 52
(77FR23161)**

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Emergency Onsite Response Capabilities

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Comment On: NRC-2012-0031-0002
Onsite Emergency Response Capabilities

June 19, 2012 (8:30 am)

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General Comment

See attached file(s)

Attachments

Comments on ANPR_Onsite Emergency Response Capabilities_06.18.2012

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DS 10

Enercon Services, Inc.
12906 Tampa Oaks Boulevard
Temple Terrace, FL 33637

June 18, 2012

Re: **Rulemaking Comments**
Docket ID NRC-2012-0031
Advance Notice of Proposed Rulemaking
Onsite Emergency Response Capabilities
10 CFR Parts 50 & 52

Enercon Services, Inc. (ENERCON) is pleased to submit comments on the Advance Notice of Proposed Rulemaking for Onsite Emergency Response Capabilities. Comments are provided in the attached table.

**Comments on Advance Notice of Proposed Rulemaking
Docket ID NRC-2012-0031
Onsite Emergency Response Capabilities
10 CFR Parts 50 and 52**

Section	NRC Question	Comment
NA	General Comment	<p>NRC staff seeks to require more "realistic" scenarios for training and drills. Recent regulatory changes promulgated by the NRC require licensees to implement a program leading to more challenging drills and exercises. Arguably, the suggestion for more realistic scenarios for training and drills has already been addressed and is currently being implemented by nuclear power plant licensees.</p> <p>Furthermore, events necessary to get to the SAMG or EDMG events are inherently unrealistic by their very nature. It is important to recognize that drilling on unrealistic scenarios can be detrimental to the overall training objectives. The effort could better be spent on emphasizing plant operating fundamentals and the EOPs.</p>
NA	General Comment	<p>While the Fukushima Daiichi event was unquestionably devastating, proper perspective must be maintained regarding the incredible nature of the natural events which led to the disaster. Appropriately, the NRC and industry are already engaged in analyzing and addressing the casual factors which led to the "breakdown" in the response of the plants to those events.</p> <p>Very important to the consideration of the need for further regulatory changes to address emergency planning for beyond design basis events, such as that experienced in Japan, is the recognition that emergency planning is specifically intended as the final level of the "defense in depth" philosophy for nuclear plant design and operation. Accordingly, what must be emphasized is that despite devastation to the Daiichi nuclear plant and the surrounding infrastructure, emergency response ensured that public health and safety was maintained and emergency planning worked.</p>

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Section	NRC Question	Comment
IV.B.2.a	Should the SAMGs be standardized throughout the industry? If so, describe how the procedures should be developed, and discuss what level of regulatory review would be appropriate. Should there be two sets of standard SAMGs, one applicable to pressurized water reactors (PWRs) and one applicable to boiling water reactors (BWRs), or should SAMGs be developed for the various plant designs in a manner similar to EOPs? Provide a discussion that supports your position.	SAMGs should not be standardized throughout the industry other than a "core set" of accidents which are truly consistent by reactor type, similar to the EOPs. Any additional requirements should be based on the site specific characteristics and risks. BWR and PWR should be separated. Power control ATWS Containment Pressure and flooding strategies are quite different and mixing won't work. It would be realistic to have the "owners groups" develop the core set and provide a structure for the site specific requirements. Realistically, having a core set would allow for more effective NRC inspection activities and an efficient utilization of the talent set in the industry
IV.B.2.b	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? Should the transition from EOPs to SAMGs be based on key safety functions, or should the SAMGs be developed in a manner that addresses a series of events that are beyond a plant's design basis? Provide a discussion that supports your position.	SAMGs should not be based on a set of specific beyond design basis events but should continue to follow the symptom based philosophy of the EOPs. Clearly, if these are event-based, there will be an event that was not previously identified. Transition from EOPs to SAMGs should be based on safety function. Such an approach would more readily address the unexpected as opposed to a pre-defined chain of events.

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Section	NRC Question	Comment
IV.B.2.c	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? Provide a discussion that supports your position.	<p>Having the operators train to take action based on the key safety functions will strengthen their abilities to address developments that were not originally expected.</p> <p>Generic guidelines should be developed to allow the licensee to develop site specific procedures. The variability in the plant designs make it difficult to establish specific procedures, however the guidelines and associated strategies can be accomplished reasonably. A focus needs to be placed on the ability to access the site following external events. Debris is a major problem following a flood. The ability to get to and move equipment around the site is going to be very difficult.</p> <p>Additionally, consideration of on site radiation level and where to muster response teams should be reviewed.</p>
IV.B.2.e and IV.B.2.f	<p>e. Should there be a requirement for the SAMGs and EDMGs to be maintained as controlled procedures in accordance with licensee quality assurance programs? Provide a discussion that supports your position.</p> <p>f. Should the SAMGs and EDMGs be added to the "Administrative Controls" section of licensee technical specifications? Provide a discussion that supports your position.</p>	The answer to e and f is No. SAMGs and EDMGs were designed to address situations beyond the design basis of the plant. The suggestions in the ANPR will make these guidelines lose all flexibility that will be required to ensure they allow for creative solutions that will be required for their effective use. The response organization will be hampered and unable to make in the field adjustments needed to address the event they are battling. An event that possibly no one imagined would occur.

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IV.B.2.g	<p>In a letter dated October 13, 2011 (ML11284A136), the Advisory Committee on Reactor Safeguards (ACRS) recommended that Recommendation 8 be expanded to include fire response procedures. In their letter, ACRS stated that some plant-specific fire response procedures can direct operators to perform actions that may be inconsistent with the EOPs, and that experience has shown that parallel execution of fire response procedures, abnormal operating procedures, and EOPs can be difficult and complex. 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? Provide a discussion that supports your position</p>	<p>Fire response strategies will need to be integrated into the overall response strategies for the event. Actions may need to be delayed to allow fire fighting activities to complete, or fire fighting activities may need to be abandoned to allow another action to occur. At a minimum the strategies need to be developed to include this type of decision making weighing one decision against another. Another consideration will be including repair activities into the decision process as well as medical emergency response. In each case the development needs to be at the guideline level and the procedures developed as site specific.</p>
IV.B.2.h	<p>What level of effort, in terms of time and financial commitment, will be required by the industry to upgrade the accident mitigating procedures? If possible, please include estimated milestones and PWR/BWR cost estimates.</p>	<p>It is estimated that two full time staff will be needed to develop the accident mitigation procedures over three years with one full time equivalent over the same time frame supporting from different disciplines in engineering and operations.</p>
IV.B.3	<p>The NTTF established the identification of clear command and control strategies as an essential aspect of Recommendation 8. What methodology would be best for ensuring that command and control for beyond design basis events is well defined?</p>	<p>During any emergency, common processes and terminology within the utility and between the utility and off-site response organizations is critical for an effective response. The Incident Command System (ICS), a subcomponent of the National Incident Management System (NIMS), is a recognized and mature all-hazards incident management approach used by all levels of government, non-governmental agencies and the private sector for any type of emergency regardless of scope or complexity.</p> <p>Implementation of a NIMS compliant ICS by the nuclear power industry would allow better integration into the NIMS, a more efficient incident command, and a more effective response.</p>

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IV.B.3.b	Should the command and control approach be standardized throughout the industry or left for individual licensees to define? Provide a discussion that supports your position.	Yes. ICS is a standardized incident management concept. An ICS based command and control structure is scalable to a particular incident, provides greater efficiency, better coordination with outside agencies already using the NIMS and ICS and provides for more effective communication between members of the ERO.
IV.B.4.b	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? Provide a discussion that supports your position.	Caution needs to be applied to ensure we do not impact training on more probable events. In other words, emphasis on less likely events could have a negative impact on the ability of the operators to mitigate the consequences of more likely off-normal/accident conditions.
IV.B.4.d	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? Should these personnel be required to be licensed or certified on the plant design? Provide a discussion that supports your position.	The Systematic Approach to Training should be applied to personnel assigned key positions. This approach is consistent with industry practices and ensures that the appropriate training is provided based on specific position responsibilities and requisite expertise.
IV.B.4.e	What training requirements should be developed to ensure emergency directors and other key decision-makers have the command and control skills needed to effectively implement an accident mitigation strategy? Provide a discussion that supports your position.	Training on SAMGs should be an extension of the EOP training. EOP training has been very effective (as have the EOPs) at vastly increasing the level of confidence and ability in protecting public health and safety. Training and testing on the SAMGs should not be at the same level as the EOPs, however, because the probability of these events is significantly less than the already low probability of the EOP based events. A concentration of effort training on SAMG type events could unnecessarily dilute the training on the EOPs.

Rulemaking Comments

From: Gallagher, Carol
Sent: Tuesday, June 19, 2012 8:12 AM
To: Rulemaking Comments
Subject: Comment on Proposed Rule - Emergency Onsite Response Capabilities
Attachments: NRC-2012-0031-DRAFT-0012.pdf - Adobe Acrobat Pro.pdf

Attached for docketing is a comment from Jay Maiser, Enercon Services, Inc., on the above noted proposed rule (77 FR 23161; April 18, 2012) that I received via the regulations.gov website on June 18, 2012.

Thanks,
Carol