

NRC Public Meeting Between The NRC And Industry

Drill and Exercise Performance Indicator

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Perspective on DEP PI

- **The Notification PI was developed to reflect regulation and the EP Function**
 - **Appendix E - Notify within 15 minutes**
 - **Function - Initiate notifications within 15 minutes**
- **The notification function was revised by NRC**
 - **Deliver the ECL in 15 minutes**

EP Notification Function

- **Regulation:**
 - A licensee shall have the capability to notify responsible State and local governmental agencies within **15 minutes** after declaring an emergency
- **Function:**
 - **Pre-rule:** Initiating notification within 15 minutes
 - **Post-rule:** Alerting them of the declared emergency within 15 minutes

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Arlington Texas Meeting

- An industry representative suggested that the DEP criteria be revised to align with regulatory requirement

A licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency

- The Emergency Preparedness Working Group (EPWG) represents the industry on generic matters
 - The EPWG does not support a change to the DEP criteria but is open to initiating NRC discussion

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Uniform Measurement of Performance

- **Notification process common to all licensees**
 - Complete notification form
 - Brief individual making notification
 - Use of notification equipment
- **Notification process not common to all licensees**
 - Variation in number of State and local authorities

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Accepted Criteria

- **NEI 99-02 does not describe the PIs as a substitute or surrogate for meeting the regulatory requirements of 10 CFR 50.**
 - It does provide a yardstick for meeting the regulation and has for over 10 years

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Other Option

- **All Notification opportunities should be demonstrated to completion**
 - **DEP timeliness criterion remains the same**
 - **First agency contacted within 15 minutes**
 - **Evaluation should not end at point where first agency is contacted**
 - **Licensees should evaluate the entire notification process from initiation to completion**
 - **Propose a revision to the clarifying notes**

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Proposed Revision

The following text could be added to NEI 99-02 page 46 line 19

...ability to use the equipment and deliver all the mutually agreed upon essential elements.

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