

**Scope and Process for Revision
of NUREG-0654/FEMA-REP-1**

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**NEI welcomes the opportunity
to provide input to the NUREG 0654
revision scope and process.**

**We will be providing comments on
behalf of our members.**



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Industry Recommendations

- **Improve emergency preparedness**
- **Maintain focus on Radiological Emergency Preparedness (REP)**
 - **Inclusion of all-hazards planning requirements is not appropriate**
- **Flexible guidance and criteria**
- **Consider performance-based approaches**



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Industry Recommendations

- **Changes and evaluation criteria must accommodate currently approved emergency plans and programs**
 - No required “backfit” beyond what was included in the EP rule
- **Coordinate changes with staff work on:**
 - Fukushima-related rulemaking (e.g., material in Recommendations 8 and 9)
 - New technologies (e.g., SMRs)

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Retain and Update as Needed

- **EPZ and IPZ planning bases**
- **All 16 planning standard evaluation criteria**
- **Appendix 2, Meteorological Criteria for Emergency Preparedness at Operating Nuclear Power Plants**
- **Appendix 3, Means for Providing Prompt Alerting and Notification of Response Organizations and Populations**

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Material to Remove

- **Appendix 1, Emergency Action Level Guidelines for Nuclear Power Plants**
 - Superseded by NEI 99-01 and NEI 07-01
- **Appendix 4, Evacuation Time Estimates within the Plume Exposure Pathway Emergency Planning Zone**
 - Superseded by NUREG/CR-7002

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Incorporation of Other Material

- **Incorporate appropriate materials from past and current documents**
 - EP Rule ISG
 - NUREG-0396
 - NUREG-0654 , Supplement 4
 - NUREG-0696
 - NUREG-0737

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Incorporation of Other Material

- **Incorporate appropriate materials from past and current documents (cont.)**
 - Insights from updated/recent accident studies
 - SOARCA
 - Source terms (e.g., alternate source term)
 - Applicable material from generic correspondence

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Additional Considerations

- **Incorporate deferred industry comments from 2009 EP Rule comment submittal**
- **Recognize new technologies for public information and JIS capabilities**
- **Dose projection model capability criteria**

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Additional Considerations

- **Update drill/exercise scenario and implementation guidance to address:**
 - Evaluation of beyond-design-basis response strategies
 - EDMGs, FLEX and SAMGs
 - NTF Recommendation 8 and 9
 - Advanced and passive reactor designs
 - Evaluations that balance competing scope considerations

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**Process
Build on Previous Success**

- **Public meetings to discuss proposed changes**
- **Regional workshops to introduce draft**
- **Two public comment opportunities**
 - Initial review of draft
 - Subsequent review of comment resolution
 - 90-day comment periods for both
- **Regional workshops to introduce final document**

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**Process
Build on Previous Success**

- **Markup of text where possible**
- **Detailed change summary/roadmap**
- **Publish no earlier than December, 2016 to minimize cumulative impact of changes**
 - EP Rule
 - FEMA REP Manual
 - Guidance (NUREG/CR-7002, REP-10, etc.)
 - Fukushima-related rulemaking

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Closing Remarks

- **Thank you for the opportunity to provide input to the NUREG 0654 revision scope and process.**

We are looking forward to open communication and transparency throughout each step of the revision process.