

August 5, 2013

MEMORANDUM TO: Robert Lewis, Director
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

FROM: Joseph Anderson, Chief */RA/*
Operating Reactor Licensing and Outreach Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

SUBJECT: COMMUNICATION PLAN FOR THE REVISION TO NUREG-0654/FEMA-REP-1, "CRITERIA FOR PREPARATION AND EVALUATION OF RADIOLOGICAL EMERGENCY RESPONSE PLANS AND PREPAREDNESS IN SUPPORT OF NUCLEAR POWER PLANTS"

Enclosed is the Communication Plan for the revision to NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," which can be found in the NRC Agencywide Documents Access and Management System (ADAMS) under ADAMS Accession No. ML12278A239. The enclosed communication plan has been developed to facilitate communications with internal and external stakeholders regarding the project underway in the Office of Nuclear Security and Incident Response. This plan has been coordinated with the Office of the General Counsel, the Office of Public Affairs, the Office of Congressional Affairs, and the Federal Emergency Management Agency.

Enclosure:
Communication Plan

CONTACT: Edward Robinson, NSIR/DPR
301-287-3774

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ADAMS Accession No. ML12278A239

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NRC AND FEMA COMMUNICATION PLAN FOR THE PLANNED REVISION TO NUREG-0654/FEMA-REP-1

I. GOAL

This communication plan outlines an effective strategy for communicating with internal and external stakeholders regarding a joint U.S. Nuclear Regulatory Commission (NRC) and Federal Emergency Management Agency (FEMA) initiative to revise NUREG-0654/FEMA-REP-1, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants” (NRC Agencywide Documents Access and Management System (ADAMS) Accession No. ML040420012).

II. BACKGROUND

FEMA and the NRC have undertaken a multi-year initiative to update onsite and offsite emergency preparedness (EP) program guidance provided in NUREG-0654/FEMA-REP-1. The two agencies published Revision 1 of NUREG-0654/FEMA-REP-1 in November 1980 following the Three Mile Island (TMI) accident to provide specific evaluation criteria for the NRC to determine its licensees’ compliance with the 16 planning standards in 10 CFR 50.47, “Emergency Plans,” and for FEMA’s review of the adequacy of offsite emergency plans and preparedness with the requirements in 44 CFR 350, “Review and Approval of State and Local Radiological Emergency Plans and Preparedness.” Although the NRC and FEMA have developed various supplements and addenda over the last 30 years to clarify and augment this guidance, the agencies have not performed a comprehensive revision to NUREG-0654/FEMA-REP-1.

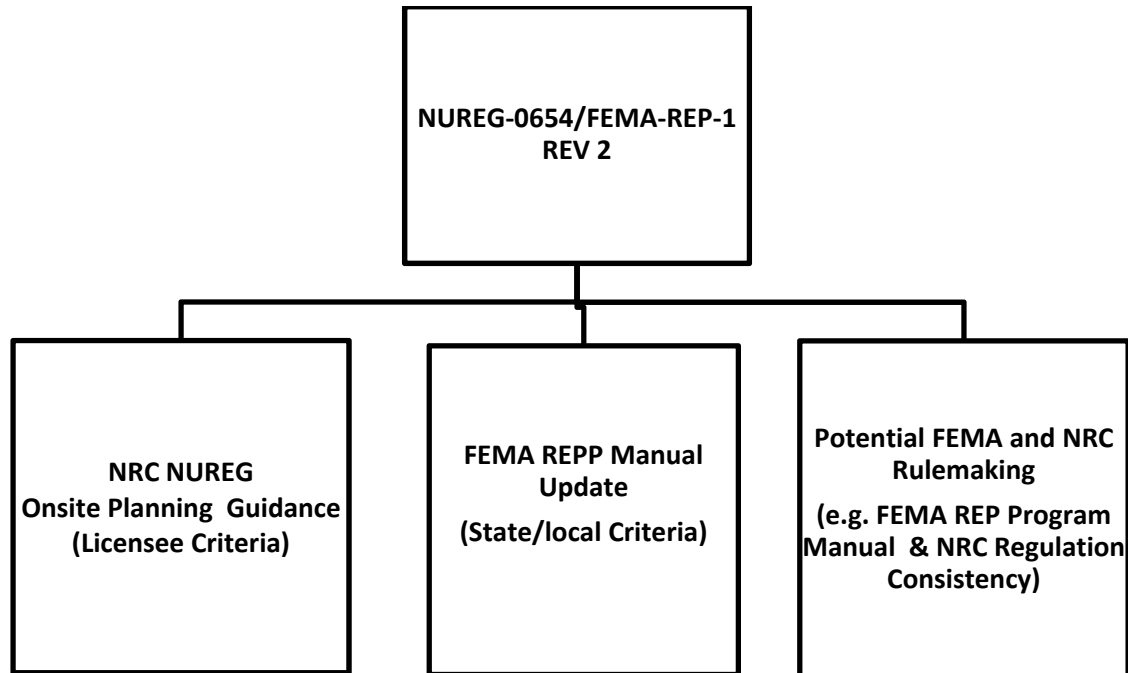
The NRC and FEMA believe guidance should be developed as openly and candidly as possible to ensure stakeholders are informed and involved in NRC processes as appropriate. Various opportunities for stakeholder participation are planned throughout the revision process. The impact of revising NUREG-0654/FEMA-REP-1 on existing EP programs and reasonable assurance findings will also be addressed.

III. KEY MESSAGES

- The NRC and FEMA are revising NUREG-0654/FEMA-REP-1. However, the current planning standards identified in 10 CFR 50.47(b) and 44 CFR 350 will not change and the revisions will be consistent with these planning standards.
- NRC and FEMA’s multi-year joint effort will include input from other Federal agencies belonging to the Federal Radiological Preparedness Coordinating Committee (FRPCC).
- Stakeholders will have the opportunity to provide the NRC and FEMA formal comments during the NUREG-0654 public comment period. In addition, members of the public will be afforded the opportunity to provide informal comments during established public meetings.

IV. SCOPE OF NUREG-0654/FEMA-REP-1 REVISION PROJECT

As indicated by the chart below, Revision 2 of NUREG-0654/FEMA-REP-1 will encompass three elements: NRC NUREG Onsite Planning Guidance, FEMA REPP Manual Update, and Potential FEMA and NRC Rulemaking.



The project's preliminary scope, identified by FEMA and NRC headquarters staff, includes:

- Adding criteria for periodically conducting licensee emergency response organization (ERO) call-in and report-in drills to demonstrate a licensee's ability to augment shift staffing in accordance with its emergency plan;
- Adding criteria for licensee EP staff training to provide an adequate level of knowledge of NRC EP requirements so that an effective EP program is developed and maintained;
- Adding criteria for designing and conducting licensee ERO training using the systematic approach to training (SAT) process;
- Updating guidance to reflect recent changes to NRC EP regulations and other NRC guidance regarding the development, updating, and use of evacuation time estimates (ETEs) and protective action recommendation (PAR) development;
- Updating guidance to reflect recent changes to other NRC guidance regarding the development of risk communication plans and messaging for nuclear power plants;
- Resolving issues identified in the course of performing the review of EP requirements documented in SECY-06-0200. For example, more detailed guidance for the recovery and reentry phases of an event might be added to NUREG-0654/FEMA-REP-1;

- Incorporating NRC interim staff guidance (NSIR/DPR-ISG-01, ADAMS Accession No. ML113010523), issued in conjunction with the 2011 EP final rule, which provides guidance for challenging drills and exercises, alternative facilities for ERO augmentation, emergency declaration timeliness, performance-based criteria for an emergency operations facility, protective actions for onsite personnel, backup alert and notification system (ANS) means, licensee coordination with State/local offsite response organizations (OROs), conducting on-shift staffing analyses, and integrating ORO event response with onsite response activities;
- Updating EP guidance in the FEMA REP Program Manual (RPM) that supersedes guidance contained in NUREG-0654/FEMA-REP-1, Revision 1;
- Resolving inconsistencies between the FEMA RPM, NRC EP regulations, and Department of Homeland Security directives;
- Applying insights from the recent State-of-the-Art Reactor Consequence Analysis (SOARCA) Study (NUREG-1935, ADAMS Accession Nos. ML12332A057/ML12332A058);
- Clarifying existing guidance in NUREG-0654/FEMA-REP-1, Revision 1, as it pertains to the review of emergency plans and preparedness programs for new reactors based on issues identified in the review of previous combined license and early site permit applications;
- Updating guidance to address the new NRC requirement for a backup ANS means; and
- Addressing impacts of issuing Revision 2 of NUREG-0654/FEMA-REP-1 on existing onsite and offsite EP programs and reasonable assurance findings.

V. AUDIENCE

The communications actions described in this communication plan will be directed to the stakeholders listed below.

NRC Internal Stakeholders

- Commission
- Office of Nuclear Security and Incident Response (NSIR)
- Office of the General Counsel (OGC)
- Office of Congressional Affairs (OCA)
- Office of Public Affairs (OPA)
- Office of Federal and State Materials and Environmental Management Programs (FSME)
- Regional State Liaison Officers, Emergency Response Coordinators, and EP Inspectors

FEMA Internal Stakeholders

- FEMA Regions I - X

- Office of Chief Counsel (OCC)
- Protection and National Preparedness (PNP)
- National Preparedness Directorate (NPD)
- Federal Radiological Preparedness Coordinating Committee (FRPCC)
- Office of Policy & Program Analysis (OPPA)
- Office of External Affairs (EA)
- Congressional Affairs Division (CAD)
- Public Affairs Division (PAD)

Joint External Stakeholders

- State, local, and tribal Emergency Managers
- National Emergency Management Association (NEMA)
- International Association of Emergency Managers (IAEM)
- Conference of Radiation Control Program Directors (CRCPD)
- Federal Radiological Preparedness Coordinating Committee (FRPCC)
- Association of State and Territorial Health Officials (ASTHO)
- Nuclear Energy Institute (NEI) / Industry Stakeholders
- Other Non-Governmental Organizations
- Interested Members of the Public

VI. COMMUNICATION TEAMS

NRC COMMUNICATION TEAM

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FEMA COMMUNICATION TEAM

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Anthony DeFelice	OCC	202-821-5174
Brett Allen	OCC	202-436-5920
Rena Connell	THD-Policy Unit	202-657-2294
James Purvis	THD-Policy Unit	202-821-2939

VII. COMMUNICATION TOOLS

This communication plan and associated information will be available to NRC management and staff for use in responding to inquiries related to the NUREG-0654/FEMA-REP-1 revision. Information that will be prepared and maintained by the Communication Team includes a list of questions and answers for use in communicating with both internal and external stakeholders.

Internal Stakeholders

- Briefings of management, including regional management, will be made as needed to provide information on the status of the revision, follow-up activities, and challenges.

External Stakeholders

- The Communication Team will provide information to NRC OPA and OCA, and DHS Public Affairs and FEMA EA including the attached questions and answers, to be used in responding to calls from the public, members of the press, or members of Congress.
- Inquiries from external industry and public interest stakeholders on the revision of NUREG-0654/FEMA-REP-1 will be directed to the appropriate Communication Team member.
- Public meetings will be held during the development of NUREG-0654/FEMA-REP-1 Revision 2. These meetings will be used as workshops to receive early feedback on the revision.
- A Press Release will be issued to announce publication of the final revision of NUREG-0654/FEMA-REP-1.
- The Communication Team will provide information to Regional State Liaison Officers, including the attached questions and answers, to be used in responding to calls from State, local and tribal government officials.
- A notice of availability of the draft revision of NUREG-0654/FEMA-REP-1 will be published in the *Federal Register*, announcing the publication of the revision to all stakeholders.
- The final revision of NUREG-0654/FEMA-REP-1 will be made available to the public in

ADAMS and online at www.regulations.gov, Docket No. FEMA-2012-0026, after publication in the *Federal Register*.

- Information regarding the status of the revision of NUREG-0654/FEMA-REP-1 will be posted on both the NRC and FEMA external website.

VIII. COMMUNICATION ACTIVITIES

The focus of the activities in this communication plan is to deliver the key messages consistently to internal and external stakeholders. These activities will be closely coordinated.

ACTIVITY	RESPONSIBLE AGENCY	TARGET DATE
Information Updates on Status and Scope	FEMA/NRC	Quarterly/Continuous
Press Release announcing the status of the Stakeholder Engagement Sessions	NRC OPA/ FEMA PAD	Aug 2013
Public Meeting Notice placed onto NRC Website	NRC	Aug 2013
Stakeholder Engagement Sessions	FEMA/NRC	Fall 2013
Follow-up Stakeholder Engagement Session (TBD)	FEMA/NRC	Mar 2014
New NRC EP Guidance Document Development (Start/End)	NRC	Jul 2014
0654 Initial Public Comment Period (90 days)	FEMA/NRC	Oct 2014 – Jan 2015
0654 2 nd Public Comment Period (60 days)	FEMA/NRC	Feb 2016 – April 2016
Revision 2 Review and Approval	FEMA/NRC	Feb 2016 – Jan 2017
Press Release announcing the issuance of NUREG-0654/FEMA-REP-1, Rev. 2	NRC OPA/ FEMA PAD	Jan 2017
NUREG-0654/FEMA-REP-1 Rev 2 Issued	FEMA/NRC	Jan 2017

Rev 2 Implementation Sessions (Start/End)	FEMA/NRC	Feb 2017 – Jun 2017
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IX. COMMUNICATION PLAN UPDATES AND REVISIONS

If major updates or revisions are needed to ensure that the goals of this communication plan or its key messages are met, the Communication Team will ensure that a formal revision is made.

This Communication Plan will be updated as part of the staff's completion of the revision to NUREG-0654/FEMA-REP-1.

X. POINTS OF CONTACT

NRC POINTS OF CONTACT

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XI. QUESTIONS AND ANSWERS

Q: Why is the revision necessary? Is existing guidance inadequate to protect public health and safety?

A: The existing guidance explains how NRC licensees can comply with the NRC's EP regulations. Licensee compliance with the NRC's regulations ensures that emergency plans and preparedness for nuclear power plants are in place in the event of a radiological emergency, thereby providing adequate protection of the public health and safety. Since the issuance of NUREG-0654/FEMA-REP-1, Revision 1 in 1980, the NRC and FEMA have issued additional planning guidance in the form of interim staff guidance, regulatory guides, standard review plans, generic communications, and guidance memoranda to clarify specific evaluation criteria. Emergency planners and other users of NUREG-0654/FEMA-REP-1, Rev. 1, have identified several evaluation criteria and sections of the document as being unclear or providing insufficient guidance for ensuring compliance with EP-related regulations. Various NRC review boards have interpreted portions of the document to provide clarification of the guidance. However, a comprehensive revision of the document has not been undertaken.

Q: I am an emergency manager in my state. How will these changes affect my emergency plans?

A: It is too soon to tell how the changes to NUREG-0654/FEMA-REP-1 will affect your emergency plans, but FEMA and the NRC are prepared to work with each state to ensure any changes are well considered and practical.

Q: Why did it take so long for NRC and FEMA to take this action?

A: Since 1980, updates and changes to NUREG-0654/FEMA-REP-1 have been in the form of supplements and addenda to address specific issues and topics. The time and resources needed to develop a comprehensive update of the document were not available. Now that NRC and FEMA have completed several major initiatives, such as the NRC's EP rule changes and the revised the 2011 issue of the FEMA REP Program Manual, resources are available to devote the time and effort needed to complete this major undertaking that is expected to take several years.

Q: As a State or local emergency manager, will I have the opportunity to participate in the document revision?

A: There will be multiple opportunities to publicly discuss the revisions to the document. Once a first draft is written and the document is released for public comment, we welcome your comments on topics of interest. All comments will be duly considered.

Q: When will my opportunity be to add my comments to the draft?

A: Based on the current schedule for revising NUREG-0654/FEMA-REP-1, a draft version of the document should be completed in 2014. At that time, stakeholders and other interested parties will be able to review it and provide comments. Depending on the number of comments and extent of changes to the initial draft version of Revision 2 based on these comments, a second opportunity to review a revised draft version of the document and provide additional comments may be provided.

Q: Will the NRC and FEMA work with other Federal agencies in completing the revision?

A: Yes, the revision of NUREG-0654/FEMA-REP-1 will be coordinated with other Federal agencies that are involved in various aspects of radiological emergency planning, such as the Environmental Protection Agency. The project team will work through the Federal Radiological Preparedness Coordinating Committee (FRPCC) to ensure this coordination takes place.

Q: What areas of NUREG-0654/FEMA-REP-1 are being revised?

A: The EP guidance needs to be updated to align with the NRC EP rule changes and the latest revision of the FEMA REP Program Manual, which was issued in April 2013. The NRC and FEMA also desire to address outdated or unclear information.

Q: What is the timeline for completion of the final draft?

A: This will be a multi-year project. A final draft is expected by 2016 and Revision 2 issued in early 2017.

Q: Will the staff include lessons learned from the accident at Fukushima Dai-ichi in Japan?

A: During the revision process of NUREG-0654/FEMA-REP-1, if the NRC EP regulations are amended or the need for additional EP guidance is identified as the result of the ongoing Fukushima Dai-ichi lessons learned initiative, then the NRC and FEMA may need to consider further updates to the guidance in Revision 2 depending on when the rulemaking takes place, when any EP rule changes take effect, and the impact of the rule or guidance changes on existing guidance.

Q: Will the staff consider outcomes from the State-of-the-Art Reactor Consequence Analysis (SOARCA) study?

A: Yes, but the applicability to EP rules and guidance is minimal. SOARCA shows that the current EP programs are protective of public health and safety when implemented as approved and practiced.

Q: How does this project align with a performance-based, risk informed approach to EP rules and guidance?

A: The risk informed, performance-based EP studies that are being conducted are truly applied research. No rulemaking is planned nor budgeted, and no technical basis for rulemaking has been established. However, the studies will likely inform the oversight process, e.g., the emergency action level (EAL) study has shown a few EALs that should be considered for revision. Updating of NUREG-0654/FEMA-REP-1 will enhance emergency preparedness and should not be delayed pending the outcome of various studies.

Q: What is the expected application of performance-based, risk-informed EP to the NUREG-0654/FEMA-REP-1 revision?

A: As addressed in the previous answer above, performance-based, risk-informed EP is applied research and the NRC currently has no plans to implement it in rulemaking. NUREG-0654/FEMA-REP-1 is guidance that is in the process of being updated. Therefore, there is no connection between performance-based, risk-informed EP and the NUREG-0654/FEMA-REP-1 revision. However, if the Commission decided to implement performance-based, risk-informed EP, Revision 2 of NUREG-0654/FEMA-REP-1 would be used as a guideline for the elements that the new rulemaking and guidance would be required to address. The implementation of performance-based, risk-informed EP is not expected or recommended at this time.

Q: How will FEMA and the NRC address the impact of issuing Revision 2 of NUREG-0654/FEMA-REP-1 on existing onsite and offsite EP programs, as well as, reasonable assurance findings?

A: The impact of issuing Revision 2 of NUREG-0654/FEMA-REP-1 on these areas will be assessed and addressed by the project team later in the revision process. The team will provide stakeholders information on how the revised guidance might impact existing onsite and offsite EP programs and reasonable assurance findings prior to the issuance of Revision 2.