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January 28, 2013

Mr. James T. Wiggins
Director
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Implementation of Multi-unit Dose Assessment Capability

Project Number: 689

Dear Mr. Wiggins:

As discussed in the NRC's Fukushima Near Term Task Force (NTTF) Report, Recommendations for Enhancing Reactor Safety in the 21st Century, dated July 12, 2011, and related commission and staff documents, licensees of U.S. commercial nuclear power plants are moving forward with implementation of the capability to perform multi-unit dose assessments.

The Nuclear Energy Institute (NEI)¹ recently surveyed the operators of multi-unit sites to determine when multi-unit dose capabilities will be in place. The results of this survey indicate that many multi-unit site licensees currently have this capability. Of those that do not, the majority plan on implementing it sometime in 2013. There are a few licensees that, due to work schedule or resource constraints, anticipate implementation sometime in 2014.

In the interim period before the installation of a fully automated multi-unit dose assessment capability, licensees would still be able to perform dose assessments during an event causing releases from multiple units. This compensatory measure would entail running a dose assessment for a release from each affected unit, using existing single-unit capabilities, and then manually summing and assessing the results. While results using this approach may be somewhat conservative, the capability to assess a release from multiple

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

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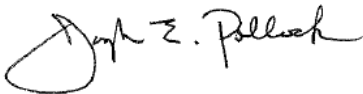
units is thus available during the interim period. The affected sites are assessing their current capabilities, and determining the necessary procedures changes and training.

As our survey results indicate, the industry is moving forward with establishing the capability to perform multi-unit dose assessments. Because of this, we believe that no near-term regulatory actions related to this topic are necessary. It would be appropriate to address multi-unit dose assessment capability as part of a future rulemaking related to emergency preparedness enhancements.

Holders of a Combined License (COL) will address the implementation of a multi-unit dose assessment capability consistent with their licensing, construction and startup schedules.

If you require additional information or wish to schedule a public meeting concerning this transmittal, please contact Sue Perkins-Grew at (202) 739-8016; spg@nei.org.

Sincerely,

A handwritten signature in black ink that reads "Joseph E. Pollock". The signature is written in a cursive style with a large initial "J" and "P".

Joseph E. Pollock

c: Mr. Robert J. Lewis, NSIR/DPR, NRC
Mr. Mark Thaggard, NSIR/DPR/DDEP, NRC
Mr. Kevin Williams, NSIR/DPR/DDEP/NRLB, NRC