

RulemakingComments Resource

From: Casey Pfeiffer [pfeiffer_casey@hotmail.com]
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RULEMAKINGS AND
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Onsite Emergency Response Capabilities Comments

The Professional Reactor Operator Society is making public comments on Recommendation 8 for Onsite Emergency Response Draft Regulatory Basis.

- Overall issue is that the term "Command and Control" is used 30 times in the document yet NRC has no formal definition. In fact section 4.3 is titled Command and Control. In my opinion, with no formal definition then this will always been a contributing factor to any event. It will be easy for NRC and other investigating agencies to say that the plant had inadequate "Command and Control". Need to have a streamline and simple definition for Command and Control and some guidelines for it.

- On page 7, where it talks about Regulatory Requirements for SAMGs the thought was how is NRC going to train up their personnel what to look for in SAMGs.

- On page 7, PROS should agree that the NRC is correct in saying that Step-by-Step procedural guidance for every potential accident is not plausible.

-On page 8, when talking about multi-unit sites would and should there be a "Command and Control" oversight for each unit separately. In other words for example if all three Units at Oconee were experiencing a flooding event should there be three people (one for each unit) that is the head decision maker. That is a question that needs to be discussed. In PROS opinion, the head decision maker should only be in charge of one unit since different things could be happening on different units. Now the engineering teams in the OSC and TSC could be the same, but the Director should be different for the units.

-On page 8, for requalification of these TSC or OSC personnel how often would they have to re-qualify. PROS would suggest yearly or every two years at the most.

-On page 10, PROS is in total agreement with the NRC about not having drastic changes to the EOPs since this would be adverse to operators if they are drastically changed.

-On page 12, the Emergency Director requirements for an SRO license or certification for lead decision maker. PROS has numerous comments about that. We believe that a management SRO cert is not good enough to qualify for the lead decision maker. We also do not believe that a person with an SRO from another plant should be adequate to be a lead decision maker. We could see the industry having people who have SRO licenses from let us say a BWR reactor trying to make decisions at a PWR plant and vice versa. PROS would compromise for the requirement if the SRO license or certification is not at the specific plant site then it needs to be on the same type (BWR/PWR) as they are the decision maker. For a certification PROS thinks that time at

the plant and responsibilities along with a good training program to become SRO certified. For example, We would think if a decision maker was an Engineering manager who had been at the site for 20 years could have a little less training time for an SRO cert than a decision maker who had jumped around from site to site only being there to “get his ticket punched” to climb the corporate ladder would need a more intensive and elaborate SRO cert training process.

- On page 13, with respect to exercises. Our question would go to NRC with how “realistic” can this exercises get without affecting the operating units. With what PROS knows about FLEX if these recommendations get approved how far do you go to make the exercise realistic? Will NRC make people doing the exercise hook up temporary equipment like they would in an accident to see if the equipment hook-up could be done and also the personnel installing the equipment do it properly. With what PROS knows about FLEX this could INOP systems such as ECCS and Aux. Feedwater to perform these measures.

Other Comments

- Merging the EOP with the SAMGs and EDMGs will make it difficult to perform the QR or 10 CFR 50.59 reviews. SAMG and EDMG guidance are not specific plant conditions. They are more symptoms based and are not specific as is the EOP guidance. There are many “what ifs” that needs to be answered and they cannot be written as specific as the EOP.

- SAMGs are written at the individual sites but corporate engineering performs cross disciplinary reviews before any changes can be in effect. The larger the document, the longer the review process. How will NRC address this?

- Training will need to be performed for the operators (ILT/LOR) and TSC members if the process is to be changed. This will impact entire sites and companies if the changes are required. SAMGs familiarization training is given bi-annually to licensed operators during LOR training cycle. For example, the EOPs have very few direct entry into SAMGs/EDMGs. EOP written to defer to TSC when SAMGs conditions exist. Currently, most REP procedures allows for 45 or 75 minutes from event declaration for staffing the TSC and EOF. The event could escalate to SAMG conditions before the staffing is in place and turnover has occurred. The SAMGs and EDMGs are not routinely used in the control room. Copies of the EDMGs are not in the control rooms. SAMGs are available but not used by the control room in the manner the EOP is used. This would take time to train to get proficient on this process.

- The K & A catalog should address the SAMGs and EDMGs but should specify how much detail the RO and SRO positions knowledge is required. This could impact ILT and LOR training times greatly. How much of the beyond design basis would be

required on ILT NRC Exams? PROS and the NRC could address this with the NEI Licensed Operator Owners' group led by Chuck Sizemore.

- The last issue is that PROS is concerned and has always been concerned with the possibility that all the changes with the SAMGs, EOPs, EDMGs, etc. will affect training time to become proficient. This could lead to Operators having not enough time to properly train on system training, simulator training on Abnormal Operating Procedures, or other minor transients that are more likely to occur than these "beyond -design bases events". PROS is in agreement that we as operators need to be better prepared for this, but not to take any from Operators' proficiency on more likely plant transients.

Option 1 is the best Rule-making option. We don't need to re-invent the processes involved. The industry and NRC should only develop new documents and processes that do not exist. The existing training and drill exercise guidance needs to be updated or improved.