

March 13, 2013

MEMORANDUM TO: Matthew A. Mitchell, Chief
Projects Management Branch
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulation

FROM: Brian K. Harris, Project Manager / **RA** /
Projects Management Branch
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF FEBRUARY 19, 2013, PUBLIC MEETING TO
DISCUSS FRAMEWORK OF PHASE 1 STAFFING SUBMITTALS
RELATED TO ISSUES ASSOCIATED WITH NEAR-TERM TASK
FORCE RECOMMENDATION 9.3

On February 19, 2013, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting¹ with the Nuclear Energy Institute (NEI) and industry representatives to discuss the framework of upcoming Phase 1 staffing submittals addressing the recommendations in the *Near-Term Task Force (NTTF) Recommendations for Enhancing Reactor Safety in the 21st Century* report, issued July 12, 2011.² The meeting was focused on Calvert Cliffs Nuclear Power Plant (CCNPP) and Catawba Nuclear Station (CNS) draft submittals to the request for information regarding emergency preparedness staffing assessments on or around April 30, 2013. Public participation was invited via meeting attendance, telephone conference and Web-based seminar.

The meeting participants are included in the enclosure to this document.

The NRC staff used a webinar format to present issues relating to the initial review of the draft staff assessment report. The draft CCNPP and CNS phase 1 staffing documents can be found under Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML13063A021 and ML13063A023, respectively. The staff also provided comments during the public meeting concerning the use of site security during a beyond design basis event. This was in response to industry comments from the January 31, 2013, public meeting. The staff provided comments concerning the details of the site-specific analysis specific to the use of security personnel (e.g., duties, duration, and staffing considerations), as detailed in Enclosure 2.

¹ The meeting notice is available via the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML13043A592.

² The NTTF report is available under ADAMS Accession No. ML111861807.

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Members of the public participated in the webinar and asked clarifying questions throughout the meeting.

Enclosure:
As stated

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Enclosure:
As stated

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NAME	BHarris	SRohrer	MMitchell	Bharris
DATE	03/13 /2013	03/ 13 /2013	03/13 /2013	03/ 13 /2013

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Public Meeting to Discuss Forthcoming Phase 1 Staffing Submittals

February 19, 2013, 8:00 a.m. to 12:00 p.m

Participant List at NRC Headquarters

Name:

Organization:

Brian K. Harris	U.S. Nuclear Regulatory Commission (NRC)
Mark Thaggard	NRC
Charles Murray	NRC
Kevin Williams	NRC
Vince Williams	NRC
Richard Chang	NRC
David Young	Nuclear Energy Institute
Walter Lee	Tennessee Valley Authority
Dave Stobaugh	EP Consulting, LLC
Jana Bergman	Scientech
John L. Overly	Duke Energy (Duke)
Douglas M. Brunson	Duke
Adrienne Driver	Duke
Michael J. Fick	Constellation Energy Nuclear Group (CENG)
David Dellario	CENG
Robert V. Pace	CENG
Charles R. Merritt, Jr.	CENG
Kathy Picciott	CENG
Michael E. Jacobs	CENG

NRC STAFF COMMENTS FOR ON-SHIFT STAFFING ANALYSIS

SPECIFIC TO SECURITY PERSONNEL

Considerations for the industry analysis to address expanded activation using security personnel:

1. How has the site evaluated the use of on-shift personnel (excluding security) to address staffing and the movement of equipment for a beyond design basis event in phases 1, 2, and 3 mitigating strategies?
2. All apparent immediate actions taken to address the condition without the use of security (e.g., the exhaustive use of other site personnel).
 - a) How is “immediately” defined for the use of security personnel to support the site event?
 - b) What are the other actions that may be taken before using 10 CFR 73.55(p)?
3. Is the site considering the use of security personnel for other beyond design basis events that are not characterized by the conditions outlined within the guidance document? If so, what are these events and the associated rationale for using security personnel?
4. Technical information concerning why the use of security personnel would address the condition.
5. If security is used to meet staffing requirements and the placement of equipment, what phase(s) would require their support?
6. The rationale concerning the use of security personnel:
 - a) How many security personnel are necessary to support the event?
 - b) What security requirements in part or total are impacted by the use of the security personnel?
 - c) What is the estimated duration for the use of security personnel?
 - d) What are the duties that will be assigned to security personnel?
 - e) What actions will be required to restore security to its normal posture?

7. Is the use of security personnel conducted via a tiered approach to minimize impact to security response capability? Use of security personnel should be sequenced such that security personnel whose reassignment will adversely impact security the least are reassigned first. (E.g., use security personnel who are performing administrative functions before those who are implementing the protective strategy.)

If a site elects to complete a staffing analysis that addresses the use of security personnel, it should be protected in accordance with 10 CFR 73.21 and 10 CFR 73.22 as a standalone document.