

# NEI/Industry Perspectives on Multi-Unit Dose Assessment, Periodic Training and Drills, and EP Facilities and Equipment

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STORIED HISTORY  
BRIGHT FUTURE

# Multi-Unit Dose Assessment

- NEI/industry will develop a high-level, performance-based standard
  - Acknowledge that different methods may be used to meet the standard – no “one size fits all”
  - Methods can be implemented following a BDBEE resulting in an extended loss of AC power
  - Manual methods should be capable of completion within a reasonable time period

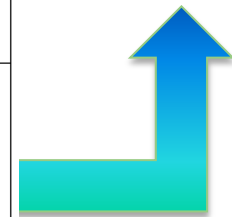
# Periodic Training

- INPO Focus on Training and Qualification of Key Personnel
  - Provide advice, input, and coordination of industry resources to incorporate post-Fukushima emergency response requirements into training and qualification programs

# Periodic Training

	EOPs	EDMGs	Flex Support Guidelines	SAMGs
<b>Procedure Integration</b>	Material developed by PWR and BWR Owners Groups	NEI 06-12	NEI 12-06	Material developed by PWR and BWR Owners Groups
<b>Requirements for SAMGs and Additional Supporting Guidance</b>	N/A	N/A	N/A	Material developed by PWR and BWR Owners Groups
<b>Command and Control</b>	Existing applicable NRC regulations and guidance	NEI 06-12	NEI 12-06	Material developed by PWR and BWR Owners Groups
<b>Training and Qualification of Key Personnel</b>	Existing applicable NRC regulations and guidance, and INPO requirements and guidance	INPO will provide National Academy of Nuclear Training (NANT) guidance for emergency response training and qualification programs. The scope of the guidance will address the operating procedures depicted in NEI 12-06, Figure 11-1, <i>Future View of Typical Operating Procedure Hierarchy</i> .		
<b>Drills</b>	Existing applicable NRC regulations and guidance; INPO to issue enhanced drill program guidance	NEI/industry to develop drill guidance; INPO to issue enhanced drill program guidance	NEI/industry to develop drill guidance; INPO to issue enhanced drill program guidance	Material developed by PWR and BWR Owners Groups; augment with NEI/industry guidance if needed; INPO to issue enhanced drill program guidance

Figure on next slide



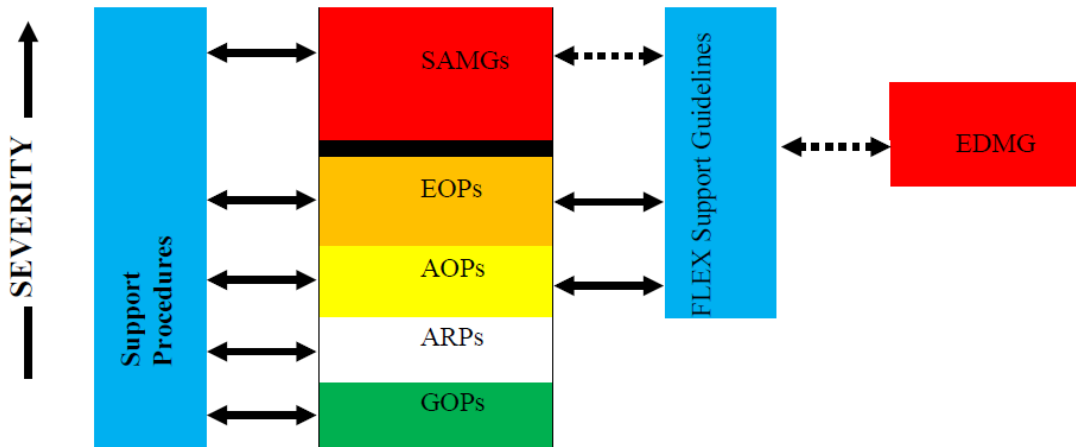
# NEI 12-06, Figure 11-1

Figure 11-1

(a) Existing View of Typical Operating Procedure Hierarchy



(b) Future View of Typical Operating Procedure Hierarchy



# INPO Training Activities

- Revise ACADs for accredited training programs
- Revise INPO document, *Guidelines for Training and Qualification of Emergency Response Organization Personnel*, and publish as an ACAD
- Revise INPO document, *Guidelines for Training to Recognize and Mitigate the Consequences of Core Damage*, and publish as an ACAD
- Use Review Visits, Plant Evaluations, and Accreditation Team Visits to provide periodic oversight

# Facilities and Equipment

- NEI 12-01 addresses the facilities and equipment for BDBEE response staff
  - “[a] licensee should identify additional work areas necessary for the performance of expanded response functions. The use of alternate emergency response facilities should be considered.”
  - Licensees are implementing enhancements identified from communications and staffing assessments (per responses to 50.54[f] letter)
- NEI 12-06 addresses FLEX equipment

# BDBEE Drill Framework

- NEI/industry will develop drill guidance
  - Including standard objectives (similar to NEI 06-04, R2)
- Conduct a drill that is initiated by a BDBEE
  - Demonstrate selected FLEX strategies that would occur prior to the arrival of the ERO (at 6-hour mark)
  - Conduct out-of-sequence demonstrations of other FLEX strategies (e.g., not within first 6 hours)
- Determine if EDMGs and SAMGs have strategies not covered by FLEX (i.e., not the same or sufficiently similar) and also demonstrate out-of-sequence



# BDBEE Drill Framework

- Conduct tabletop/walkthrough drills to demonstrate assessment of EDMG and SAMG strategies, and perform decision-making
- Recognize RRC demonstration(s) of the ability to deliver equipment to pilot sites [*in summer of 2014*]
- Long-term – periodic table-top drills, mini-drills, or full-scale drills may be methods utilized to maintain proficiency

# BDBEE Drill Framework

- Consider work hour limitations and overall organizational/resource impacts when developing drill requirements and implementation methods (e.g., out-of-sequence)
- New regulations to address FLEX, EDMG and SAMG drills
  - Since these concern implementation of accident mitigation and management strategies, they should not be located in 10 CFR 50.47 or Appendix E
  - BDBEE drills should not be associated EP exercises

# Sustainability

- Industry is aware of the need to find the right “homes” for BDBEE response program elements
  - Keep these programs healthy over the long-term
- Options are being developed
- Consider assignment/allocation of staffing and resources necessary to maintain programs
  - EP may be assigned responsibility to coordinate conduct of full-scale BDBEE drills (given their expertise in this area through E-Plan drill requirements)