

NUREG-0654/FEMA-REP-1, REVISION 2, STAKEHOLDER ENGAGEMENT MATERIAL

The enclosed information is provided in support of the Stakeholder Engagement sessions scheduled for October 29-31, 2013 (ADAMS Accession No. ML13193A171; www.regulations.gov, Docket ID: FEMA-2012-0026). The information that follows consists of preliminary draft evaluation criteria for Section II of NUREG-0654/FEMA-REP-1, Revision 2. The criteria are grouped by the planning standards found in Federal Emergency Management Agency (FEMA) and Nuclear Regulatory Commission (NRC) regulations (44 CFR 350.5(a) and 10 CFR 50.47(b) respectively).

Each planning standard was assigned to one of four writing teams, comprised of FEMA and NRC headquarters and regional emergency preparedness staff. The teams were tasked with developing new or revising current evaluation criteria based on changes to emergency preparedness-related regulations, policies, directives, technologies, and lessons learned since NUREG-0654/FEMA-REP-1, Revision 1, was issued. This is a key step in revising the document to provide enhanced guidance for the development, review, and evaluation of NRC licensee and offsite radiological emergency response planning and preparedness surrounding the Nation's commercial nuclear power plants.

Each preliminary draft criterion is presented in the following format:

- the wording of the criterion and list of applicable organizations;
- any clarifying or explanatory information associated with the criterion;
- the corresponding criterion (or criteria) and applicable organizations as found in NUREG-0654/FEMA-REP-1, Revision 1;
- a redline version of the criterion to show where changes have been made; and
- a general discussion of why changes were made to an existing criterion, why an existing criterion is no longer needed, or why a new criterion was added.

The writing teams will review the criteria with stakeholders during the sessions and be available for questions. Feedback provided by stakeholders will be considered by the writing teams in making any further changes to the criteria.

Several key changes have been incorporated into the preliminary draft evaluation criteria, as highlighted below:

- The criteria have been written using non-mandatory, active voice language to denote they are provided as recommendations for meeting the planning standards. These criteria would be used by FEMA and NRC reviewers for determining the adequacy of emergency plans and preparedness programs in the absence of an approved alternative approach.
- Additional explanatory information for the criteria will be placed in the FEMA REP Program Manual and a new NRC emergency preparedness guidance document to be developed in conjunction with NUREG-0654/FEMA-REP-1, Revision 2.
- The criteria for utility offsite radiological emergency response planning and preparedness, for those situations in which State and/or local governments decline to participate in emergency planning, have been incorporated into the criteria for other offsite response organizations (OROs) where appropriate. These criteria were located in Supplement 1 to NUREG-0654/FEMA-REP-1, Revision 1, and can now be identified by the term "Licensee ORO" in the list of applicable organizations.
- Tribal entities have been incorporated into the wording of the criteria and list of applicable organizations (where appropriate) in accordance with Federal policy.
- Separate criteria for early site permit (ESP) applicants are no longer provided, as the information within Supplement 2 to NUREG-0654/FEMA-REP-1, Revision 1, has been subsumed into the main document. Section I of NUREG-0654/FEMA-REP-1, Revision 2, will provide a discussion of the actions an ESP applicant will need to address for submitting an emergency plan as part of its application.
- Several criteria were revised or added to incorporate information from other FEMA and NRC guidance documents, including Supplement 4 of NUREG-0654/FEMA-REP-1, Revision 1, the FEMA REP Program Manual, NSIR/DPR-ISG-01, NUREG-0696, and NUREG-0737, Supplement 1.

In summary, the writing teams have been focused on developing preliminary draft evaluation criteria in Section II of NUREG-0654/FEMA-REP-1, Revision 2, for discussion on October 29-31, 2013. The revision of Section I and other changes to the document are in progress and will be available for public review at a later time.

Planning Standard C

Planning Standard Language
Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's EOF have been made, and other organizations capable of augmenting the planned response have been identified.
Regulatory References: 10 CFR 50.47(b)(3) , 44 CFR 350.5(a)(3)

Evaluation Criterion C.1

Preliminary Draft Rev. 2 Version
OROs provide emergency response support and resources for staffing of the licensee's EOF.
Applicability: State, Local, Tribal, Licensee ORO
Additional Information: Information should be included in plans and procedures for the State and counties provide liaison and coordination support to the EOF and to contact various Federal agencies and other organizations for assistance where necessary.

Rev. 1 Version	Redline Version
New criterion; no previous version exists.	<u>OROs provide emergency response support and resources for staffing of the licensee's EOF.</u>
Applicability: n/a	Applicability: <u>State, Local, Tribal, Licensee ORO</u>
General Discussion <i>This criterion was created to ensure that resources are provided by the State, county, or other ORO to fill coordination roles within the EOF and in dose assessment centers, as well as anywhere else there is need for joint activity, and therefore coordination, between the licensee and the OROs. <u>This change constitutes the creation of a new criterion.</u></i>	

Evaluation Criterion C.2

Preliminary Draft Rev. 2 Version
The plan describes the additional resources relied upon in an emergency, including the following:
Applicability: Licensee, State, Local, Tribal, Licensee ORO
Additional Information: The incorporation of additional resources may be situational. Where appropriate, each principal organization should anticipate and identify those circumstances under which support would be requested (e.g., natural disaster, challenges to the physical security of the reactor site, large radiological releases, etc.). Each organization should consider both the short-term support needed to respond to, mitigate, and stabilize the emergency situation, and also long-term support needed in a post-accident environment.
<ol style="list-style-type: none"> OROs: State agencies that must interface with Federal agencies shall incorporate information into their plans and procedures that allow for a smooth coordination of effort. Licensees: Consider resources from the plant’s nuclear steam system supplier; the plant’s architect engineer; industry groups such as INPO and NEI; other sites within a corporate fleet; and public safety entities such as fire departments, law enforcement, ambulance services; medical support for radiation injuries; radiological laboratories, etc.

C.1, Rev. 1 Version	Redline Version
The Federal government maintains in-depth capability to assist licensees, States and local governments through the Federal Radiological Monitoring and Assessment Plan (formerly Radiological Assistance Plan (RAP) and Interagency Radiological Assistance Plan (IRAP). Each State and licensee shall make provisions for incorporating the Federal response capability into its operation plan, including the following:	The Federal government maintains in-depth capability to assist licensees, States and local governments through the Federal Radiological Monitoring and Assessment Plan (formerly Radiological Assistance Plan (RAP) and Interagency Radiological Assistance Plan (IRAP). Each State and licensee shall make provisions for incorporating the Federal response capability into its operation plan, The plan describes the additional resources relied upon in an emergency , including the following:
Applicability: Licensee, State, Local	Applicability: Licensee, State, Local, Tribal, Licensee ORO
<p>General Discussion</p> <p><i>This criterion was revised to be more consistent with the language of the planning standard itself. Rather than singling out Federal capabilities, the focus ought to be on identifying the resources needed from any source and how those resource needs are to be met. This is particularly the case for licensees, since the FRMAP is no longer relevant and did not support the site in the first place. “Tribal” and “Licensee ORO” entities have been added as part of this revision to consolidate Supplement 1 to NUREG-0654/FEMA-REP-1, Revision 1, and align with FEMA’s Tribal policy. <u>This change constitutes a revision of Evaluation Criterion C.1.</u></i></p>	

Evaluation Criterion C.2.a

Preliminary Draft Rev. 2 Version
The plan identifies the person(s), by title, authorized to request assistance from responding organizations.
Applicability: Licensee, State, Local, Tribal, Licensee ORO
<p>Additional information: Where the authority to request assistance depends on the source of the assistance, each position and corresponding authority should be specified. Where organization command-and-control is anticipated to transfer as the emergency continues, the degree of authority assigned each position holding command-and-control authority should be identified.</p> <ol style="list-style-type: none"> OROs: Identifying specific key positions to be responsible for requesting Federal assistance results in less confusion during an actual event. Key officials authorized to request Federal assistance may be at the State, local, or tribal-level. The Nuclear/Radiological Incident Annex of the NRF describes available Federal assistance that can be called upon to assist in technological hazards. Licensees: The site Emergency Director (Shift Manager) may have the authority to request aid from offsite fire, medical, law enforcement, or other local organizations, while the authority to request aid from State, Federal, or industry organizations may be assigned to other senior emergency response organization positions or to licensee executives. Any independent authorities retained by the Shift Manager after transfer of overall event command-and-control should be identified.

C.1.a, Rev. 1 Version	Redline Version
specific persons by title authorized to request Federal assistance; see A.1.d, A.2.a	<u>The plan identifies the specific person(s), by title, authorized to request Federal assistance <u>from responding organizations</u>; see A.1.d, A.2.a</u>
Applicability: Licensee, State	Applicability: Licensee, State, <u>Local, Tribal, Licensee ORO</u>
<p>General Discussion</p> <p><i>This criterion was revised to be more consistent with the language of the planning standard itself. Rather than singling out Federal capabilities, the focus is now on identifying the resources needed from any source and how those resource needs are to be met. "Tribal" and "Licensee ORO" entities have been added as part of this revision to consolidate Supplement 1 to NUREG-0654/FEMA-REP-1, Revision 1, and align with FEMA's Tribal policy. <u>This change constitutes a revision of Evaluation Criterion C.1.a.</u></i></p>	

Evaluation Criterion C.2.b

Preliminary Draft Rev. 2 Version
The plan describes (1) each individual organization from which assistance may be requested, (2) the circumstance(s) in which the support would be required, (3) each specific resource or capability expected to be provided, and (4) when the expected resources would be available once requested.
Applicability: Licensee, State, Local, Tribal, Licensee ORO
<p>Additional Information: Each organization should demonstrate a commitment by each identified contributing organization to provide the resources or capabilities described in the plan. This commitment may be through legal requirements, letters of agreement, memoranda of understanding, contracts, or other mechanisms providing assurance the assistance will be provided as needed.</p> <ol style="list-style-type: none"> OROs: At a minimum, planning must encompass emergencies with large radiological releases that would result in implementing the National Framework, and anticipate the Federal response described in the Radiological Annex. Additional support could come from nearby States, Federal installations in or near the emergency planning zone(s), contractors, vendors, mutual-aid compacts or other sources. Licensees: Includes fire, hazardous material response, ground/air ambulance, on-scene or remote medical services, law enforcement, traffic management, site access control, offsite assembly areas, and any other functions provided directly to the reactor site. Planning should also encompass, at a minimum, response by the Nuclear Regulatory Commission.

C.1.a-c, Rev. 1 Version	Redline Version
C.1.a: specific persons by title authorized to request Federal assistance; see A.1.d, A.2.a	<p><u>The plan describes (1) each individual organization from which assistance may be requested, (2) the circumstance(s) in which the support would be required, (3) each specific resource or capability expected to be provided, and (4) when the expected resources would be available once requested.</u></p>
C.1.b: specific Federal resources expected, including expected times of arrival at specific nuclear facility sites; and	
C.1.c: specific licensee, State and local resources available to support the Federal response, e.g., air fields, command posts, telephone lines, radio frequencies and telecommunications centers	
Applicability: Licensee, State, Local	Applicability: Licensee, State, Local, <u>Tribal, Licensee ORO</u>
<p>General Discussion</p> <p><i>This criterion was revised to be more consistent with the language of the planning standard itself. Rather than singling out Federal capabilities, the focus is now on identifying the resources needed from any source and how those resource needs are to be met. "Tribal" and "Licensee ORO" entities have been added as part of this revision to consolidate Supplement 1 to NUREG-0654/FEMA-REP-1, Revision 1, and align with FEMA's Tribal policy. <u>This change constitutes a revision of Evaluation Criterion C.1.a-c.</u></i></p>	

Evaluation Criterion C.2.c

Preliminary Draft Rev. 2 Version
Specific Federal resources expected, including approximate times of arrival at specific nuclear facility sites.
Applicability: State, Licensee ORO
Additional Information: FRMAC Consequence Management Procedures describe response time, Phase 1 equipment, and personnel mobilization.

C.1.b, Rev. 1 Version	Redline Version
specific Federal resources expected, including expected times of arrival at specific nuclear facility sites; and	Specific Federal resources expected, including expected times of arrival at specific nuclear facility sites, and
Applicability: Licensee, State	Applicability: Licensee , State, <u>Licensee ORO</u>
<p>General Discussion</p> <p><i>Applicability to the Licensee was removed as the NRC will coordinate requests for Federal resources by the licensee. "Licensee ORO" was added as part of this revision to consolidate information from Supplement 1 to NUREG-0654/FEMA-REP-1, Revision 1. <u>This change constitutes a revision of Evaluation Criterion C.1.b.</u></i></p>	

Evaluation Criterion C.2.d

Preliminary Draft Rev. 2 Version
The plan identifies the resources (e.g., working space, airfields, full spectrum of telecommunication capabilities, and transportation systems) that would be provided or made available to the supporting organizations.
Applicability: Licensee, State, Local, Tribal, Licensee ORO
<p>Additional Information: These resources consist of buildings, property, temporary housing, temporary or permanent power, communications and information technology infrastructure, maintenance or calibration facilities, instruments, warehouses, garages, parking areas, trucks or trailers or vehicles, stocks of fuel or other essential supplies, aircraft or airfields, or any other equipment and services needed by those assisting agencies whose aid is requested by the principal organization. This may also include the organization’s staff or personnel necessary to manage or service the provided assets. Not all assets are required to be maintained in a state of readiness; it may be appropriate to have agreements with third parties such that the required assets are available in nearly the same time frame as arrival of the supporting organization(s).</p> <ol style="list-style-type: none"> OROs: Federal assets can be incorporated into the team environment faster if they are aware of telecommunications capabilities (e.g. radio frequencies) utilized by the State to coordinate efforts of first responders and radiological field survey personnel. Licensees: This support could be to industry, State and/or Federal responders, depending on the circumstances and agreements.

C.1.c, Rev. 1 Version	Redline Version
specific licensee, State and local resources available to support the Federal response, e.g., air fields, command posts, telephone lines, radio frequencies and telecommunications centers.	<u>The plan identifies the specific licensee, State and local resources available to support the Federal response, (e.g. <u>working space</u>, air fields, command posts, telephone lines, radio frequencies and telecommunications centers. <u>full spectrum of telecommunication capabilities, and transportation systems</u>) that it would provide to the organization that will provide the requested support.</u>
Applicability: Licensee, State, Local	Applicability: Licensee, State, Local, <u>Tribal, Licensee ORO</u>
<p>General Discussion</p> <p><i>This criterion has been revised to be more consistent with the language of the planning standard itself. Rather than singling out Federal capabilities, the focus is now on identifying the resources needed from any source and how those resource needs are to be met, including resource needs of the supporting organizations. “Tribal” and “Licensee ORO” entities have been added as part of this revision to consolidate Supplement 1 to NUREG-0654/FEMA-REP-1, Revision 1, and align with FEMA’s Tribal policy. <u>This change constitutes a revision of Evaluation Criterion C.1.c.</u></i></p>	

Evaluation Criterion C.2.e

Preliminary Draft Rev. 2 Version
The plan describes how onsite access would be provided for onsite responders from OROs (e.g., fire departments, law enforcement, etc.). The plan describes how the offsite organizations will operate jointly with the onsite organization.
Applicability: Licensee, State, Local, Tribal, Licensee ORO
<p>Additional Information: Joint or coordinated operations between offsite and onsite responders at the reactor site or on licensee property are most likely in the event of a threat to the physical security of the reactor site. However, planning should identify any other circumstances that apply. Methods of site access and coordination should be identified for each circumstance. Some provisions, planning, and procedures may be safeguards information and more properly be made part of the site’s Physical Security Plan; where this applies, applicable emergency plans should identify that provisions have been made, that the details are sensitive information, and provide a reference to the document(s) where details are found.</p> <ol style="list-style-type: none"> OROs: Coordination with the licensee is needed to identify site access requirements, establish annual training to maintain currency, and establish procedures for replacing personnel with access to the site and protected areas. Licensees: In providing these agreements, licensees should ascertain any conditions that would preclude site access. In the past, some licensees have experienced situations in which some volunteer firefighters could not qualify for personnel radiation monitoring necessary for site access.

Rev. 1 Version	Redline Version
New criterion; no previous version exists.	<u>The plan describes how onsite access would be provided for onsite responders from OROs (e.g., fire departments, law enforcement, etc.). The plan describes how the offsite organizations will operate jointly with the onsite organization.</u>
Applicability: n/a	Applicability: <u>Licensee, State, Local, Tribal, Licensee ORO</u>
<p>General Discussion</p> <p><i>This criterion was revised to address the need for arrangements to be in place for all external organizations that need to access the site to provide the requested resources. Identifying this upfront minimizes the likelihood of, for example, volunteer fire fighters arriving at the site and not getting access because they are less than 18 years old and cannot be badged as a radiation worker. <u>This change constitutes the creation of a new criterion.</u></i></p>	

Evaluation Criterion C.2.f

Preliminary Draft Rev. 2 Version
The plan describes how the licensee will coordinate, use, or deploy resources or capabilities provided in response to requests for assistance, to include HAB events.
Applicability: Licensee
Additional Information for Licensees: The plan should describe the positions in each emergency response organization expected to be responsible for the effective deployment, direction, and use of requested or anticipated assistance. The plan should also describe whether the expected assistance will operate under the direction of the principal organization; act autonomously, act with cooperative decision-making, or be accountable to the principal organization in some other manner. The OROs will decide on the resources available that they will commit when the event occurs depending on their ongoing commitments.

Rev. 1 Version	Redline Version
New criterion; no previous version exists.	<u>The plan describes how the licensee will coordinate, use, or deploy resources or capabilities provided in response to requests for assistance.</u>
Applicability: n/a	Applicability: <u>Licensee</u>
<p>General Discussion</p> <p><i>This criterion was created to address the additional coordination that would be required in a HAB event (e.g., the licensee’s ERO needing to coordinate with an incident command post). To a lesser degree, the criterion would also be applicable to non-HAB events. <u>This change constitutes the creation of a new criterion.</u></i></p>	

Evaluation Criterion C.3.a

Preliminary Draft Rev. 2 Version
The plan describes the capability of each organization to liaise or coordinate with other principal organizations participating in the emergency response.
Applicability: Licensee, State, Local, Tribal, Licensee ORO
Additional Information: This coordination may involve the dispatch of individual liaisons to the each other’s EOC or EOF, or by appropriate telecommunications, information technology, or video conferencing methods, to ensure effective communications and data sharing between the organizations with overlapping operational or information functions. The organizations between which pre-planned coordination is required may vary depending on the nature of the emergency (e.g. natural disaster, radiological emergency, or threat to physical security of the reactor site). If remote technologies are used, the plan will identify appropriate backup means for coordination. Reliance on telecommunications initially, later supplemented with the liaison personnel may be an appropriate approach, particularly for SEOC located at great distance from the licensee’s EOF.

C.2.a and C.2.b Rev. 1 Version	Redline Version
C.2.a: Each principal offsite organization may dispatch representatives to the licensee’s near-site Emergency Operations Facility. (State technical analysis representatives at the nearsite EOF are preferred.)	<u>The plan describes the capability of each organization to liaise or coordinate with other principal organizations participating in the emergency response.</u>
C.2.b: The licensee shall prepare for the dispatch of a representative to principal offsite governmental emergency operations centers.	
Applicability: Licensee, State, Local	Applicability: <u>Licensee, State, Local, Tribal, Licensee ORO</u>
<p>General Discussion</p> <p><i>The original C.2.a and C.2.b criteria were combined and re-written to focus on the liaison and coordination rather than on the means of accomplishing it. With the advances in telecommunications, a physical presence may not be necessary or desirable. In addition, the phrase “nearsite” was omitted for consistency with the 2011 NRC EP final rule. <u>This change constitutes a revision of Evaluation Criteria C.2.a and C.2.b.</u></i></p>	

Evaluation Criterion C.3.b

Preliminary Draft Rev. 2 Version
The plan describes the arrangements for working space and telecommunications support at its emergency response center for designated coordinating agency liaisons.
Applicability: Licensee, State, Local, Tribal, Licensee ORO
<p>Additional Information: Support should be provided only for those coordinating organizations identified in each emergency plan.</p> <ol style="list-style-type: none"> OROs: As identified in State plans and procedures, the State department/agency tasked with the responsibility for radiological oversight and evaluation will determine the necessary personnel to interface with the licensee EOF accident analysis team at the EOF. Access to real time radiological data electronically will enhance the accident analysis capabilities at the State EOC.

Rev. 1 Version	Redline Version
New criterion; no previous version exists.	<u>The plan describes the arrangements for working space and telecommunications support at its emergency response center for designated coordinating agency liaisons.</u>
Applicability: n/a	Applicability: <u>Licensee, State, Local, Tribal, Licensee ORO</u>
<p>General Discussion</p> <p><i>This criterion was created to ensure that adequate working space and telecommunications capability are provided to liaisons from other principal participating organizations, should liaisons be dispatched. In order to anticipate and make timely protective action decisions on plant radiological conditions and releases, the technical members of the ORO response staff need to verify any projected radiological release from the affected plant. State personnel co-located at the EOF will obtain and transmit radiological data from the plant along with meteorological data necessary to perform dose assessment. A link to the licensee’s Emergency Response Data System that supplies NRC headquarters with information would enable state personnel to see real time radiological conditions in the plant. The State Technical Liaison at the EOF will be able to give the state accident analysis personnel up to date information on the status of the plant, time frame for repair of critical safety equipment, and any developing trends. <u>This change constitutes the creation of a new criterion.</u></i></p>	

Evaluation Criterion C.3.c

Preliminary Draft Rev. 2 Version
The licensee ORO plan provides for knowledgeable personnel to advise State, local, and tribal officials, if they opt to participate in the response.
Applicability: Licensee ORO
Additional Information for Licensee OROs: Liaisons should be provided to those OROs not formally participating in radiological planning to enable them to take ad hoc measures as necessary and coordinate with the licensee and licensee-based offsite response organization(s). These liaisons should be knowledgeable about offsite emergency planning, radiological assessment, and protective-action decision making.

Supplement 1, C.5, Rev. 1 Version	Redline Version
The offsite response organization shall identify liaison personnel to advise and assist State and local officials during an actual emergency in implementing those portions of the offsite plan where State or local response is identified.	The offsite response organization shall identify liaison <u>The licensee ORO plan provides for knowledgeable</u> personnel to advise and assist State, and local, <u>and tribal</u> officials during an actual emergency in implementing those portions of the offsite plan where State or local response is identified <u>if they opt to participate in the response.</u>
Applicability: n/a	Applicability: <u>Licensee ORO</u>
General Discussion <i>Information was moved into criterion C.3 from the original C.5 since it is relevant to liaisons and coordination. This Licensee ORO criterion was retained since it differs from the criteria for the other organization types. <u>This change constitutes a revision of Evaluation Criterion C.5 from Supplement 1 to NUREG-0654/FEMA-REP-1.</u></i>	

Evaluation Criterion C.3.d

Preliminary Draft Rev. 2 Version
<p>The plans for organizations directly responsible for radiological monitoring, analysis, or dose projection describe the capability provided to liaisons, including sharing analytical results with other Federal, State, local, and tribal organizations performing radiological assessment functions, including the Federal Radiological Monitoring and Assessment Center when it is deployed, including, if, how, and when a transition to the FRMAC may occur.</p>
<p>Applicability: Licensee, State, Local, Tribal, Licensee ORO</p>
<p>Additional Information: It is unlikely that a FRMAC will be activated for an event of lesser than national significance. Also, FRMAC activation may take an extended period of time. Some licensees have joint radiological monitoring facilities in which licensee, State, local, and tribal OROs co-locate to coordinate monitoring actions and share assessment results. These facilities will stand alone until the FRMAC is activated.</p>

Rev. 1 Version	Redline Version
<p>New criterion; no previous version exists.</p>	<p><u>The plans for organizations directly responsible for radiological monitoring, analysis, or dose projection describe the capability provided to liaisons, including sharing analytical results with other Federal, State, local, and tribal organizations performing radiological assessment functions, including the Federal Radiological Monitoring and Assessment Center when it is deployed.</u></p>
<p>Applicability: n/a</p>	<p>Applicability: <u>Licensee, State, Local, Tribal, Licensee ORO</u></p>
<p>General Discussion</p> <p><i>This new criterion was added since the revised criterion C.1 no longer focuses on FRMAC, but rather <u>any</u> supporting organization. This criterion applies to any organization that performs radiological monitoring that has a need to share data with FRMAC or that would transfer such monitoring to the FRMAC. <u>This change constitutes the creation of a new criterion.</u></i></p>	

Evaluation Criterion C.4.a

Preliminary Draft Rev. 2 Version
Each State identifies radiological laboratories, their general capabilities, and expected availability to provide radiological monitoring and analyses services which can be used in an emergency to augment Federal and State capabilities.
Applicability: State
Additional Information for States: State plans and procedures will identify additional laboratories available to accept and process samples to assist in the long term response to a radiological release from a licensed fixed nuclear facility. Laboratories should be able to process and analyze soil, water, vegetation and milk samples in a timely manner to assist in the long term survey activities to support State decision making on relocation of personnel, temporary reentry of individuals for approved tasks in contaminated areas and clearing of embargoed animals and crops.

C.3, Rev. 1 Version	Redline Version
Each organization shall identify radiological laboratories and their general capabilities and expected availability to provide radiological monitoring and analyses services which can be used in an emergency.	Each organization shall identify <u>State identifies</u> radiological laboratories, and their general capabilities, and expected availability to provide radiological monitoring and analyses services which can be used in an emergency <u>to augment Federal and State capabilities.</u>
Applicability: Licensee, State	Applicability: Licensee , State
<p>General Discussion</p> <p><i>Licensee applicability was omitted as the licensee’s laboratory criteria are in Planning Standard I. <u>This change constitutes a revision of Evaluation Criterion C.3.</u></i></p>	

Evaluation Criterion C.4.b

Preliminary Draft Rev. 2 Version
The plan describes the arrangements for obtaining support from ORO resources (e.g., fire departments, law enforcement, etc.) needed to support onsite response actions during an emergency, including hostile action.
Applicability: Licensee
<p>Additional Information for Licensees: Offsite public safety organizations generally have multiple duties in addition to supporting the onsite response. For example, police officers designated to staff evacuation traffic control points may instead be responding to hostile action at the plant or firefighters designated to perform route alerting may instead be responding to major fires at the plant resulting from hostile action. This situation could detract from ORO emergency plan implementation if plans have not been revised to address this contingency. Licensees should consider expanding the use of mutual assistance agreements with neighboring authorities to identify and plan for additional LLEA resources and other site-specific solutions to this issue.</p> <p>An adequate description of this offsite assistance would include general descriptions of the offsite agencies, and the resources and equipment available to those agencies which could be used in responding to emergencies at the nuclear power plant site. Although the description does not have to include references to specific equipment by type and number, a general description should demonstrate the capability of the offsite agency to respond to site emergencies, including those involving hostile action, to the extent that such a response is credited or relied upon by the licensee in the emergency plan. For certain types of offsite assistance, such as law enforcement agency response during hostile action, details of the specific resources that may be deployed in response to hostile action, response times, and specific equipment available to the offsite agency may be considered sensitive information and, thus, unavailable or inappropriate to include in the description of assistance in the emergency plan.</p>

C.4, Rev. 1 Version	Redline Version
Each organization shall identify nuclear and other facilities, organizations or individuals which can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement.	Each organization shall identify nuclear and other facilities, organizations or individuals which can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement. <u>The plan describes the arrangements for obtaining support from ORO resources (e.g., fire departments, law enforcement, etc.) needed to support onsite response actions during an emergency, including hostile action.</u>
Applicability: Licensee, State, Local	Applicability: Licensee, State, Local
<p>General Discussion</p> <p><i>This criterion and additional information address the guidance in NSIR/DPR-ISG-01, Section IV.C and is consistent with NRC's response to EPFAQ 2013-003. This change constitutes a revision of Evaluation Criterion C.4.</i></p>	

Evaluation Criterion C.5

Preliminary Draft Rev. 2 Version
The plan describes arrangements for integrating the licensee’s response with the NRC HQ and regional incident response centers and, when dispatched, the NRC’s site team.
Applicability: Licensee
Additional Information for Licensees: Refer to NUREG-0728, “NRC Incident Response Plan”, for information on the NRC response actions.

Rev. 1 Version	Redline Version
New criterion; no previous version exists.	<u>The plan describes arrangements for integrating the licensee’s response with the NRC HQ and regional incident response centers and, when dispatched, the NRC’s site team.</u>
Applicability: n/a	Applicability: <u>Licensee</u>
General Discussion <i>This information was not formalized when NUREG-0654/FEMA-REP-1, Revision 1, was issued and should be included as a criterion. <u>This change constitutes the creation of a new criterion.</u></i>	

Evaluation Criterion C.5.a

Preliminary Draft Rev. 2 Version
The plan identifies the plant data to be transmitted over the NRC’s Emergency Response Data System (ERDS) and describes the provisions for activating the system during an emergency.
Applicability: Licensee

Rev. 1 Version	Redline Version
New criterion; no previous version exists.	<u>The plan identifies the plant data to be transmitted over the NRC’s Emergency Response Data System (ERDS) and describes the provisions for activating the system during an emergency.</u>
Applicability: n/a	Applicability: <u>Licensee</u>
<p>General Discussion <i>This information was not formalized when NUREG-0654/FEMA-REP-1, Revision 1, was issued and should be included as a criterion. Although the ERDS is addressed as a communications capability, this criterion is focused on how the system will be used (e.g., how the system will be activated and which data points are provided). As such, this is a liaison/coordination item, rather than hardware. <u>This change constitutes the creation of a new criterion.</u></i></p>	

Evaluation Criterion C.5.b

Preliminary Draft Rev. 2 Version
The plan describes provisions to continuously maintain an open communications line with the NRC, when requested, staffed by personnel with sufficient knowledge and competency to ensure efficient and effective information flow.
Applicability: Licensee

Rev. 1 Version	Redline Version
New criterion; no previous version exists.	<u>The plan describes provisions to continuously maintain an open communications line with the NRC, when requested, staffed by personnel with sufficient knowledge and competency to ensure efficient and effective information flow.</u>
Applicability: n/a	Applicability: <u>Licensee</u>
<p>General Discussion</p> <p><i>This information was not formalized when NUREG-0654/FEMA-REP-1, Revision 1, was issued and should be included as a criterion. The criterion is focused on the licensee’s use of the open communication link and the training of the people who will staff the line, rather than the configuration of the line itself. As such, this is a liaison/coordination item, rather than hardware. <u>This change constitutes the creation of a new criterion.</u></i></p>	

Evaluation Criterion C.6

Preliminary Draft Rev. 2 Version
Appropriate provisions are made to enable and ensure responsive, effective, and coordinated onsite response support is planned for and generated by the OROs in a hostile action-based incident as needed.
Applicability: State, Local, Tribal, Licensee ORO

Rev. 1 Version	Redline Version
New criterion; no previous version exists.	<u>Appropriate provisions are made to enable and ensure responsive, effective, and coordinated onsite response support is planned for and generated by the OROs in a hostile action-based incident as needed.</u>
Applicability: n/a	Applicability: <u>State, Local, Tribal, Licensee ORO</u>
<p>General Discussion <i>This criterion was added to define the expectations for OROs regarding onsite response support during hostile action events. It is further quantified and explained in detail in the FEMA REP Program Manual. <u>This change constitutes the creation of a new criterion.</u></i></p>	

Evaluation Criterion C.7

Preliminary Draft Rev. 2 Version
Personnel are provided to advise and assist State, local, and tribal officials in implementing those portions of the offsite plan where State, local, and tribal response is identified.
Applicability: Licensee ORO
Additional Information for Licensee OROs: Emergency plans and procedures are developed for non-participating State, local, and tribal organizations, and act as State, local, and tribal key responders during drills and exercises to ensure developed plans and procedures will work when and if the State, local, and tribal organizations choose to participate. Under the NRC realism rule, it is assumed that in the event of a real accident condition potentially affecting the health and safety of the general public, State, local, and tribal elected officials will take actions to protect the public. Therefore developed and tested plans and procedures need to be available for the unlikely event that State, local, and tribal officials failed to participate in the planning phase.

Supplement 1, C.5, Rev. 1 Version	Redline Version
The offsite response organization shall provide personnel to advise and assist State and local officials in implementing those portions of the offsite plan where State or local response is identified.	The offsite response organization shall provide p Personnel <u>are provided</u> to advise and assist State, and local, <u>and tribal</u> officials in implementing those portions of the offsite plan where State, and local, <u>and tribal</u> response is identified.
Applicability: n/a	Applicability: <u>Licensee ORO</u>
<p>General Discussion</p> <p><i>This criterion was developed as part of Supplement 1 to NUREG 0654/FEMA-REP-1, Revision 1, to address emergency preparedness when State, tribal, and/or local governments decline to participate in emergency planning. <u>This change constitutes a revision of Evaluation Criterion C.5 from Supplement 1.</u></i></p>	