

ORDER FOR SUPPLIES OR SERVICES

PAGE OF PAGES
1 15

IMPORTANT: Mark all packages and papers with contract and/or order numbers.

BPA NO. NRC-HQ-11-A-42-0028

1. DATE OF ORDER SEP 24 2013		2. CONTRACT NO. (If any) GS10F0124J		6. SHIP TO:	
3. ORDER NO. NRC-T006		4. REQUISITION/REFERENCE NO NRR-13-272 Dated: 7/15/2013		a. NAME OF CONSIGNEE U.S. Nuclear Regulatory Commission	
5. ISSUING OFFICE (Address correspondence to) U.S. Nuclear Regulatory Commission Div. of Contracts Attn: Morie Gunter-Henderson Mail Stop: 3WFN-05C79 Washington, DC 20555				b. STREET ADDRESS	
				c. CITY Washington	
				d. STATE DC	e. ZIP CODE 20555
7. TO:		f. SHIP VIA			
a. NAME OF CONTRACTOR ICF INCORPORATED, L.L.C. ICF INCORPORATED		DUNS: 072648579 DUNS+4:		8. TYPE OF ORDER	
b. COMPANY NAME				<input type="checkbox"/> a. PURCHASE REFERENCE YOUR _____ Please furnish the following on the terms and conditions specified on both sides of this order and on the attached sheet, if any, including delivery as indicated.	
c. STREET ADDRESS 9300 LEE HWY				<input type="checkbox"/> b. DELIVERY <small>Except for billing instructions on the reverse, this delivery order is subject to instructions contained on this side only of this form and is issued subject to the terms and conditions of the above-numbered contract.</small>	
d. CITY FAIRFAX		e. STATE VA	f. ZIP CODE 220316050		
9. ACCOUNTING AND APPROPRIATION DATA CO200 20-11-7-183 J4677 252A 31X0200.220 OBLIGATE: \$68,000.00 Contractor DUNS: 072648579 FFS: 133025		\$68,000.00		10. REQUISITIONING OFFICE NRO	
11. BUSINESS CLASSIFICATION (Check appropriate box(es)) <input type="checkbox"/> a. SMALL <input checked="" type="checkbox"/> b. OTHER THAN SMALL <input type="checkbox"/> c. DISADVANTAGED <input type="checkbox"/> d. WOMEN-OWNED <input type="checkbox"/> e. HUBZone <input type="checkbox"/> f. SERVICE-DISABLED VETERAN-OWNED <input type="checkbox"/> g. WOMEN-OWNED SMALL BUSINESS (WOSB) <input type="checkbox"/> h. EDWOSB <small>ELIGIBLE UNDER THE WOSB PROGRAM</small>				12. F.O.B. POINT	
13. PLACE OF a. INSPECTION		14. GOVERNMENT B/L NO.		15. DELIVER TO F.O.B. POINT ON OR BEFORE (Date)	
b. ACCEPTANCE				16. DISCOUNT TERMS	
17. SCHEDULE (See reverse for Rejections)					

ITEM NO. (a)	SUPPLIES OR SERVICES (b)	QUANTITY ORDERED (c)	UNIT (d)	UNIT PRICE (e)	AMOUNT (f)	QUANTITY ACCEPTED (g)
	Task Order No. 6 Entitled "Onsite Emergency Response capabilities Rulemaking " as seen in the attached Statement of Work. The issuance of this task order does not amend any other terms and conditions of the subject BPA. Base Period of Performance: Date of award - 10/31/2013 with option period 1: 11/01/13 - 10/31/14 Ceiling amount: \$162,021.00 Obligated amount: \$68,000.00					

SEE BILLING INSTRUCTIONS ON REVERSE	18. SHIPPING POINT	19. GROSS SHIPPING WEIGHT	20. INVOICE NO.	17(h) TOTAL (Cont. pages)
	21. MAIL INVOICE TO:			
	a. NAME NRC Payments U.S. Nuclear Regulatory Commission			
	b. STREET ADDRESS (or P.O. Box) One White Flint North; Mailstop 03-E17A 11555 Rockville Pike	PHONE: FAX:		
c. CITY Rockville	d. STATE MD	e. ZIP CODE 20852-2738	\$68,000.00	17(i). GRAND TOTAL

22. UNITED STATES OF AMERICA
BY (Signature)

23. NAME (Typed)
Morie Gunter-Henderson
Contracting Officer
TITLE: CONTRACTING/ORDERING OFFICER

9/24/13

AUTHORIZED FOR LOCAL REPRODUCTION
PREVIOUS EDITION NOT USABLE

OPTIONAL FORM 347 (REV. 2/2012)
PRESCRIBED BY GSA/FAR 48 CFR 53.213(f)

TEMPLATE - ADM001

SUNSI REVIEW COMPLETE

OCT 03 2013

ADM002

A.1 FSS-BPA TERMS AND CONDITIONS

This order is subject to the terms referenced in BPA NRC-HQ-11-A-42-0028 and the General Services Administration (GSA) Federal Supply Schedule Contract # GS10F0124J.

A.2 CONSIDERATION AND OBLIGATION (JUN 1988)

- (a) The total estimated cost to the Government for full performance under this contract is \$162,021.00
- (b) The amount obligated by the Government with respect to this Task Order is \$68,000.00. This obligated amount may be unilaterally increased from time to time by the Contracting Officer by written modification to this contract. The obligated amount shall, at no time, exceed the Task Order ceiling as specified in paragraph (a) above. When and if the amount(s) paid and payable to the Contractor hereunder shall equal the obligated amount, the Contractor shall not be obligated to continue performance of the work unless and until the Contracting Officer shall increase the amount obligated with respect to this contract. Any work undertaken by the Contractor in excess of the obligated amount specified above is done so at the Contractor's sole risk.

A.3 TASK/DELIVERY ORDER PERIOD OF PERFORMANCE (AUG 2011)

This order shall commence on date of award and will expire on 10/31/2013 with one option period:
Option period 1: 11/01/2013 – 10/31/2014.

A.4 CONTRACTOR ACCEPTANCE OF TASK ORDER 6

This issuance of this work order does not amend any terms or conditions of the delivery order under the GSA FSS Contract. Acceptance of Task Order No. 6 shall be made by having an official, authorized to bind your organization, execute two copies of this documents in the space provided and return one copy to the Contract Specialist. Retain the other copy for your records.

Accepted Task Order No. 6

Julie Larkin

Digitally signed by Julie Larkin
DNC cmw Julie Larkin, cmcf Incorporated, LLC
Senior Contracts Manager, email=Larkin@cmcf.com
Date: 2013.09.24 09:52:50 -04'00'

Signature

09/24/2013

Date

Julie Larkin
Senior Contracts Manager

Title

TASK ORDER STATEMENT OF WORK

JCN Q4272 (J4677 – NRR)	Contractor ICF	Task Order No. NRC-T006
Applicant NA	Design/Site NA	Docket No. NA
Title/Description Onsite Emergency Response Capabilities Rulemaking Assistance		
TAC No. NA	B&R Number _____	SRP or ESRP Section(s)
NRC Task Order Project Officer (PO) Elinor Cunningham 301-415-6580 Elinor.Cunningham@nrc.gov		
NRC Technical Monitor (TM) Stewart Schneider 301-415-4123 Stewart.Schneider@nrc.gov		

Statement of Work
Rulemaking for Onsite Emergency Response Capabilities
Q4272 Task order 6
(J4677-NRR)

1.0 BACKGROUND

The U.S. Nuclear Regulatory Commission (NRC) was created by enactment of the Energy Reorganization Act of 1974, as an independent agency of the Federal Government. The NRC is responsible, in part, for the protection of public health and safety, common defense and security, and the environment in the civilian use of nuclear power and nuclear materials. In the pursuit of this mission, the NRC promulgates rules, which impose regulatory requirements on the nuclear industry to maintain safety of the licensed facilities and materials.

There are three major program offices at the NRC that are responsible for promulgating rules: the Office of Nuclear Reactor Regulation (NRR), the Office of New Reactors (NRO), and the Office of Federal and State Materials and Environmental Management Programs (FSME). NRR is responsible for the licensing and regulatory oversight of nuclear power reactors, non-power research reactors, and utilization facilities. FSME is responsible for developing, implementing, and overseeing the regulatory framework for industrial, commercial, and medical uses of radioactive materials, uranium recovery activities and the decommissioning of previously operating nuclear facilities and power plants. NRO is responsible for leading and managing the activities associated with the licensing of new nuclear power plants (NPPs), including planning and scheduling, infrastructure development, environmental and safety reviews and project management of new reactor activities in support of licensing, oversight, and rulemaking programs for new reactors.

Each of these three major program offices is responsible for managing and supporting the promulgation of rules for those licensees and applicants it regulates, including rules supported by other program and support offices such as the Office of Nuclear Security and Incident Response (NSIR). The NRC publishes approximately 50 rulemaking actions each year and

expects its rulemaking program to remain steady over the next several years. The NRC requires technical assistance to support these rulemaking actions. NRC rulemaking technical support activities include, but are not limited to: the development of responses to petitions for rulemaking; development of rulemaking plans; evaluation and analyses of rulemaking options, considerations, and history; review, resolution, and documentation of staff and public comments; performance of regulatory analyses; preparation of environmental assessment and impact statements; analysis of the information collection burden; preparation of draft and final regulatory analysis guidance documents; and editorial and clerical assistance in the preparation of proposed and final rules. The development of NRC regulations is a process, which must follow certain procedures and often requires a significant amount of supporting analysis. Public comments on proposed rules, advance notices of proposed rulemakings, and petitions for rulemaking must be thoroughly and objectively analyzed.

2.0 OBJECTIVE

The objective of this task order is to assist in developing the regulatory analysis, backfit analysis, and Office of Management and Budget (OMB) supporting statement for the onsite emergency response capabilities rulemaking, using the regulatory basis developed for this rulemaking activity.

3.0 WORK REQUIREMENTS, SCHEDULE AND DELIVERABLES

Tasks/Standards	Scheduled Completion	Deliverables
<p>1. Prepare for and attend kickoff meeting</p> <p>Utilize and follow, as applicable, NRC Management Directives and Office Instructions (e.g., LIC 300), as provided by the Technical Monitor (TM), to review the Recommendations for Enhancing Reactor Safety in the 21st Century: The Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident report (NTTF Report) recommendations, the published advanced notice of proposed rulemaking (77 FR 23161) and draft regulatory basis (78 FR 1154), public comments received on the draft regulatory basis, NRC staff non-concurrences on the regulatory basis, and the relevant government regulations, guidance, and policies, industry initiatives, and scientific or academic studies needed to complete the regulatory analysis and backfit analysis.</p> <p>STANDARD: Detailed review by technical expert and/or supporting specialists.</p>	Hold kickoff meeting within 5 business days after contract award.	<ul style="list-style-type: none">a) Detailed meeting notes submitted in a technical letter report.b) Travel, support, and participation at internal NRC project meeting (plan for one 2-person meeting).

Tasks/Standards	Scheduled Completion	Deliverables
<p>2. Perform initial regulatory analysis and backfit/issue finality analyses to inform proposed rule activities</p> <ul style="list-style-type: none"> a) Identify costs and benefits (including a qualitative evaluation of benefits as appropriate) using the initial estimates of available information for the list of activities provided by the NRC for incorporation into a future regulatory analysis for a proposed rulemaking. b) Identify information collection burden and cost for incorporation into a future OMB supporting statement. c) Identify additional data needs as part of this task. d) Prioritize the additional data needs based on expected impact on cost or benefit and provide a best estimate of the benefit or cost. e) Prepare an initial estimate of the feasibility of achieving a substantial safety enhancement to meet the backfitting and issue finality requirements in 10 CFR 50.109 and Part 52, respectively. f) Incorporate NRC staff comments and prepare a revision to a) through e) as appropriate. g) Prepare for and travel to NRC Headquarters to support two (2) NRC staff working group meetings and resolve working group comments on deliverables. <p>STANDARD: Deliverables prepared in accordance with NRR Office Instruction LIC-300 (current revision), NUREG/BR-0058 (Rev. 4), and NUREG/BR-0184 (January 1997). To the extent possible, this evaluation should incorporate the applicable findings from the Regulatory basis for the Station Blackout Mitigation Strategies (SBOMS) rulemaking.</p>	<ul style="list-style-type: none"> a) Draft initial regulatory analysis and backfit/issue finality analyses to inform proposed rule activities due 6 weeks after completion of Task 1. b) Revised initial regulatory analysis and backfit/issue finality analyses to inform proposed rule activities due 2 weeks after receipt of NRC comments. 	<p>Technical evaluation report providing:</p> <ul style="list-style-type: none"> a) Regulatory analysis and backfit and issue finality analyses b) Identified information collection burden and cost c) Identified additional data needs and prioritization

Tasks/Standards	Scheduled Completion	Deliverables
<p>3. Support public meetings for proposed rulemaking regarding regulatory analysis, backfit/issue finality analyses, and OMB supporting statement as directed</p> <ul style="list-style-type: none"> a) Prepare for and travel to NRC Headquarters to participate with NRC staff during an ACRS meeting on the proposed rulemaking and prepare a travel report b) Prepare for and travel to NRC Headquarters to participate with NRC staff for a public meeting to discuss the proposed rulemaking, as appropriate. <p>STANDARD: Deliverable developed from the combination and integration of contractor and NRC staff notes taken during the public meetings written at a college-level understanding.</p>	<p>a/b) Document detailed meeting notes related to the regulatory analysis, backfit/issue finality analyses, and OMB supporting statement for proposed rulemaking, due 3 days after meeting attended.</p>	<p>Review attendee feedback related to the regulatory analysis, backfit/issue finality analyses, and OMB supporting statement for the proposed rulemaking; and revise applicable sections as needed for all deliverables.</p>
<p>4. Finalize regulatory analysis, backfit/issue finality analyses, and OMB supporting statement to support proposed rule</p> <ul style="list-style-type: none"> a) Draft regulatory analysis, backfit/issue finality analyses, and OMB supporting statement b) Incorporate NRC staff comments and prepare a second draft c) Prepare for and travel to NRC Headquarters to support NRC staff working group meetings <p>STANDARD: Deliverables prepared in accordance with NRR Office Instruction LIC-300 (current revision), NUREG/BR-0058 (Rev. 4), and NUREG/BR-0184 (January 1997). Draft regulatory analysis, backfit/issue finality analyses, and OMB supporting statement that are reasonably equivalent to and developed from comparable NRC analyses based on above references, and in accordance with TM-provided guidance.</p>	<p>a) Draft, revised, and final regulatory analysis, backfit/issue finality analyses, and OMB supporting statement based on project schedule discussed at the kickoff meeting, and approved by the COR.</p> <p>b) Provide interim drafts of all analyses to support discussion and resolution of issues during working group meetings.</p>	<p>Technical evaluation reports providing publication ready:</p> <ul style="list-style-type: none"> a) Regulatory analysis and backfit/issue finality analyses b) OMB supporting statement.

The Technical Monitor may issue technical instruction from time to time throughout the duration of this task order. Technical instructions must be within the general statement of work delineated in the task order and shall not constitute new assignments of work or changes of such a nature as to justify an adjustment in cost or period of performance. The contractor shall refer to Section A.18 of the base contract for further information and guidance on any technical directions issued under this task order.

Any modifications to the scope of work, cost or period of performance of this task order must be issued by the CO and will be coordinated with the NRO Project Officer.

4.0 TECHNICAL AND OTHER SPECIAL QUALIFICATIONS REQUIRED

The contractor shall provide individuals with at least seven years of technical experience in the following areas:

- Severe Accident Progression
- Alternative Review
- Emergency Preparedness
- Reactor Operations
- Cost-benefits assessment
- Regulatory and backfit analyses
- NRC rulemaking support activities
- OMB clearance requirements
- Quantitative / statistical data analyses

The contractor shall provide a contractor project manager (PM) to manage the effort and ensure the timely submittal of quality deliverables so that all information is accurate and complete as defined in the base contract. The assigned PM shall not be the contractor's lead technical expert.

The NRC will rely on representations made by the contractor concerning the qualifications of the personnel assigned to this task order, including assurance that all information contained in the technical and cost proposals, including resumes, is accurate and truthful. The resume for each professional proposed to work under this task order (contractor, subcontractor, or consultant) shall describe the individual's experience in applying his or her area of engineering specialization to work in the proposed area. The use of particular personnel on this contract is subject to the NRC technical monitor's (TM's) approval. This includes any proposed changes to key personnel during the life of the task order.

5.0 REPORTING REQUIREMENTS

Monthly Letter Status Report

The contractor shall provide a monthly letter status report summarizing accomplishments, expenditures, contractor staff hours expended, percent completed for each task under this task order, and any problems encountered by the contractor. The report shall be sent electronically (by e-mail) to the NRC Task Order TM, NRC Contract TM, Project Officer (PO) and CO by the 15th of the month following the period reported.

Please refer to Attachment 8, Section 6.1 of the basic contract award document for contract reporting requirements.

Technical Report Requirements

As detailed above, and unless otherwise directed, the contractor shall provide all deliverables as draft products. The NRC TM will review all draft deliverables (and coordinate any internal NRC staff review, if needed) and provide comments back to the contractor. The contractor shall revise the draft deliverable based on the comments provided by the TM, and then deliver a revised version of the deliverable which can be the final version. When mutually agreed upon between the contractor and the TM, the contractor may submit preliminary or partial drafts to help gauge the contractor's understanding of the particular work requirement. More than one round of drafts may be needed if the contractor does not successfully incorporate the TM's comments on the previous draft.

The contractor shall provide the following deliverables in both hard copy and electronic formats unless directed by the TM. The electronic format shall be provided using a Microsoft-based product (e.g., Outlook, Word, Excel, PowerPoint) unless specifically approved by the TM. All deliverables should be in the format of draft version, revision version with redline/strikeout with a change-control appendix, and a revised version which can be the final version. Contractor shall maintain appropriate revision control in an electronic format.

For each "final" deliverable (e.g., draft, revised, or final) that accomplishes a specific or portion of a subtask activity, the contractor shall provide an electronic copy to both the PM and the TM with notification of delivery to the PO. The contractor shall explicitly state in its submittal that the product provided is the deliverable for Task/Subtask xx, as further described below. The schedule for deliverables shall be contained in the approved project plan for the task order effort.

Contractor shall develop (as necessary), maintain, and control data, files, information, and deliverables pursuant to this contract consistent with federal law, instructions, and guidelines to protect and prevent unauthorized release of privacy, medical, security-related information, and other sensitive information. Contractor data, files, information, instructions, and deliverables conducted or subject to this task order shall be maintained in such a format to facilitate contract close out, delivery to NRC, and execution/implementation by the NRC.

Contractor shall not conduct third-party communications or release any information pursuant to this task order to persons other than the NRC staff unless specifically approved by the TM.

In all correspondence, include identifying information:

JCN No.: J4677

Task Order No.:

Task/Standard No.: These are the paragraph numbers in Section 3.0

Task Description: These are the task titles provided in Section 6.0

6.0 MEETINGS AND TRAVEL

<u>Task(s)</u>	<u>Activity</u>	<u>Number of Meetings</u>	<u>Number of Days</u>	<u>Persons/Meeting</u>	<u>Location</u>
1	Prepare for and attend kickoff meeting	1	2	NRC or Contractor	
2	Develop regulatory analysis and backfit/issue analyses to support regulatory basis	2	2	NRC	
3a	Prepare for and travel to NRC Headquarters to participate with NRC staff during an ACRS meeting on the proposed rulemaking and prepare a travel report (estimated 1 trip but may change with COR approval)	1	2	NRC	
3b	Prepare for and travel to NRC Headquarters to participate with NRC staff for a public meeting to discuss the proposed rulemaking (estimated 5 trips but may change with COR approval)	5	2	NRC	
4	Develop regulatory analysis, backfit/issue finality analyses, and OMB supporting statement to support proposed rule	6	2	NRC	

For meetings and travel, as directed by the TM:

- a) Duration, distance, and attendance may be modified based on required contractor support.
- b) The number of meetings may increase or decrease based on subtask work load.
- c) Meetings may be conducted via telephone or video conference.
- d) Contractor travel to NRC Headquarters should be planned as follows: Metro rapid transit from Washington, DC, to White Flint Station or privately-owned vehicle from ICF International, Falls Church, VA to NRC Headquarters.

7.0 NRC FURNISHED MATERIAL

The NRC will furnish documents and information not readily available to the contractor.

NRC will work to provide TM-approved contractor personnel with the following access:

- a) Special access to Agencywide Documents Access and Management System (ADAMS);
- b) Access to NRC-required training for contractors;
- c) Unescorted access to NRC HQ facilities; and,
- d) Access to NRC email.

8.0 LEVEL OF EFFORT

The estimated level of effort in professional-staff hours apportioned among the tasks and by labor category is detailed below to assist in project management and planning. Also assume the indicated level of effort and percent (%) effort percentages for the identified labor category. Level of Effort information for subtasks shall not be used during project implementation as cost floors or ceilings unless specified by the TM.

Task	Description	Labor Category (% effort)			Level of Effort (work hours)	
		Senior staffer	Junior staffer	Admin	FY'13	FY'14
1	Prepare for and attend kickoff meeting	80	20	0	20	0
2	Develop regulatory analysis and backfit/issue finality analyses to support regulatory basis	40	50	10	310	0
3	Support public meetings for proposed rulemaking regarding regulatory analysis, backfit/issue finality analyses, and OMB supporting statement as directed	60	30	10	0	50
4	Develop regulatory analysis, backfit/issue finality analyses, and OMB supporting statement to support proposed rule	40	50	10	0	620
Total (work hours)					330	670

9.0 PERIOD OF PERFORMANCE

The projected period of performance is from date of award through September 30, 2014.

10.0 OTHER APPLICABLE INFORMATION

a. License Fee Recovery

All work under this task order is not fee recoverable.

b. Assumptions and Understandings:

The level of effort for Tasks 1, 2, 3, and 4 is based on the assumption that the contractor maintains persons assigned to these tasks with:

- i. ability to communicate effectively at a college level;
- ii. technical expertise with the requirements of 10 CFR Parts 50 and 52 63;
- iii. technical expertise with EOPs, SAMGs, EDMGs, and other mitigation strategies;
- iv. technical expertise with regulatory analysis, backfit/issue finality analyses, and OMB supporting statements;
- v. familiar with the Administrative Procedures Act;
- vi. familiar with NRC procedures and guidance on the conduct of rulemaking; and,
- vii. travel and meeting attendance is subject to change per COR approval.

It is understood that the Tasks 1, 2, 3, and 4 will require periodic conference calls and meetings with the NRC staff, and external stakeholders (such as Federal representatives and NRC licensees) to discuss issues requiring resolution. As such, the contractor staff will be considered a contracted representative of the NRC and will be held to the same high standards incumbent upon NRC employees. Therefore, the contractor staff shall be professional and courteous with NRC staff, industry representatives, and members of the public. Unless specifically directed by the TM, contractor staff shall not write or discuss with any non-NRC representative any action, decision, or direction conducted pursuant to this task order. In the conduct of meetings with non-NRC staff, contractor shall represent NRC positions, policies, and conclusions, unless specifically asked or tasked by the TM. Should the contractor staff identify or offer differing opinions or technical positions, the contractor shall discuss (and if necessary document) these issues with the TM as soon as practicable.

For travelers pursuant to Tasks 1, 2, 3 and 4, the contractor's recommended person(s) for travel shall be approved by the TM. The selected traveler(s) shall provide information necessary to achieve access to the subject facility or location; this information will include necessary personally-identifiable information. Should reasonable accommodation (RA) be necessary or personnel medical or physical conditions warrant special consideration, the contractor shall inform the TM of the RA for planning and coordination purposes.

All travel conducted pursuant to this task order is billable to this task order. Billable travel includes: transportation, hotel, and hours in a travel mode (e.g., moving from point A to point B); per diem for meals is not included. All travel shall be efficiently conducted (e.g., ride sharing, coach seating, and within Federal per diem rates) and coordinated with NRC staff to reduce travel costs. The contractor may and should recommend changes to the task order travel descriptions to enhance the effectiveness of task order execution; changes are subject to TM approval. On occasion for special circumstances (such as contractor staff turn-over and knowledge management), the TM may need to implement changes to the travel tasks, these changes will be coordinated with the contractor and travel-cost-sharing may be implemented subject to approval and documentation by both the TM and contractor.

The contractor shall recommend to the TM contractor staff desiring special access to the NRC's ADAMS, unescorted access to NRC HQ facilities, and access to NRC email. These persons shall provide all information necessary to enable access and shall successfully and timely complete NRC-required training for contractors. The TM will establish due dates for completion of assigned training. Contractor-recommended staff desiring information and building access is subject to TM approval.

The contractor shall timely inform the TM should any contractor person with badged access to NRC facilities or special access NRC IT infrastructure, have any arrest, detained under the authority of law, or have other substantial legal or criminal matters which could cause concerns regarding the individual's access to NRC facilities or infrastructure as described in the previous paragraph. The contractor shall provide enough information to enable the NRC to make a determination of continued access.

It is assumed that the contractor has access to the NRC's website and that reference documents information can be read or obtained. Contractor shall inform the TM if contractor does not have access to a particular document, instruction, or guidance; the TM will endeavor to provide said document to the contractor. If contractor identifies a document requiring a fee for access, and desires the NRC to pay the fee, the contractor shall discuss this need with the TM.

The primary deliverables are necessary for successful rulemaking. These deliverables will aid the staff and Commission in determining whether the proposed actions are needed, in providing adequate justification for the proposed action, and in documenting a clear explanation of why a particular action was recommended. As a result, the deliverables must accurately and sufficiently document the benefits and costs for the proposed actions. Sufficient and verifiable references shall be made and documented. Should significantly opposing views, studies, and concerns be identified, these shall be timely communicated to the TM and documented as directed. As stated in the particular tasks, deliverables shall be written at a college-level understanding to accurately represent the technical issues, evaluations, conclusions, and legal considerations associated with the proposed action or issue; however, summary information shall also be provided to effectively inform a member of the general public of the issue and staff-proposed action(s).

Attachment 1

SOW input for Recommendation 8 Regulatory Analysis

Evaluate the Final Regulatory Basis options to determine the cost/safety benefit of a new Onsite Emergency Response Capabilities rule. Evaluate the four options presented in the regulatory basis for new requirements in the area of accident management and the preliminary rule language in Appendix C. Evaluate the cost/benefit of the following specific activities that would be required by the industry and NRC in response to a new onsite emergency response capability rule:

Industry-wide activities

1. Developed enhanced generic SAMGs with lessons learned from Fukushima Dai-ichi and other industry operating experience and research since the early 1990s.
2. Develop generic guidance for FLEX guidelines to support new extended station blackout mitigating strategies.
3. Develop industry guidance document for Recommendation 8 – guidance on procedures, command and control, training and drills/exercises.
4. Develop industry standards for SAT-based training programs for individuals involved in severe accident and beyond-design-basis accident management (specifically TSC personnel).
5. Support NRC in development of K/A catalog update to identify new knowledge and ability requirements for licensed operators in the area of severe accident and beyond-design-basis accident management.

Individual licensees' activities

1. Revise SAMGs to meet new generic owners groups standards.
2. Develop site specific FLEX guidelines to support additional strategies/capabilities.
3. Review EOPs, EDMGs, Spent fuel pool abnormal operating procedures, and emergency procedures for the shutdown/cooldown modes and develop an integrated strategy for accident management from EOPs through SAMGs. Ensure that procedures and guidelines work together, develop effective transitions between procedures, and ensure that overall strategy is coherent and comprehensive.
4. Review the site's firefighting strategies to identify and correct any potential conflicts with strategies developed for severe accidents and beyond design basis events.
5. Develop and document a command and control strategy for beyond design basis events and severe accidents that illustrates the organizational structure,

- communications plan, and decision making process for the specific purposes of onsite accident management (do not review aspects of implementation of the emergency plan).
6. Identify, train and qualify individuals to be designated ultimate decision makers for the purposes of accident management during severe accidents and beyond design basis events. (Evaluate various potential requirements for this individual: Current SRO license, previous license on current plant, previous license on a similar technology, or SRO certification on the current plant.)
 7. Develop and implement a SAT-based, continuing training program for accident management personnel who would be have key roles during a beyond design basis event or severe accident (TSC personnel).
 8. Amend current SAT-based training programs for additional personnel who will participate in the implementation of SAMGs, EDMGs and FLEX guidelines (maintenance personnel, non-licensed operators, health physics personnel etc.).
 9. Develop additional training objectives and programs to address new K/As for licensed operators in the area of control room actions associated with severe accidents and beyond design basis events. (In developing the benefits of these additional training objectives, evaluate any concern for the safety impact they could have on the operator licensing programs in terms of affecting the available time for training on the current K/As).
 10. Develop drill/exercise program to provide the opportunity to observe licensee abilities in the area of severe accidents and beyond design basis events. Exercises should be realistic enough to demonstrate ability of the command and control organization to make decisions in real-time and for field personnel to deploy additional strategies and equipment associated with the extended station blackout mitigating strategies. Simulators should be considered for use up to their current capacity and then followed-up with instructor cues and table-top discussions. (Evaluate the following potential frequencies of these drills/exercises: 2 years, 4 years and 8 years)

NRC activities

1. Develop a proposed and final rule in the area of onsite emergency response capabilities.
2. Respond to public comments on proposed rule and final rule.
3. Develop a regulatory guide in support of a new onsite emergency response capability rule.
4. Through various potential methods (letter of endorsement, regulatory guide, safety evaluation), review and endorse, where appropriate, the owners groups generic SAMGs.

5. Revise licensed operator K/A catalogs with new knowledge requirements in the area of severe accidents and beyond design basis events.
6. Develop inspection guidance and inspector training programs to support inspections of new requirements.
7. Conduct inspections of licensee procedures and training programs associated with severe accidents and beyond design basis events.
8. Develop new enforcement guidance related to the new onsite emergency response capability rule.
9. Observe drills/exercises associated with new onsite emergency capability rule.

Additional considerations

Develop a cost/safety benefit analysis on the following alternative approaches to the onsite emergency response capability rule. These alternative approaches are currently not included in the regulatory basis; however they have been or are being considered by the NRC staff:

1. Require licensees to redesign their accident management procedures (EOPs, SAMGs, EDMGs, FLEX etc) into a fully integrated set of procedures/guidance documents written in a common format. Require a human factors evaluation as outlined by NUREG-0711 as a potential methodology for developing the new, comprehensive, integrated strategy.
2. Require licensees to update their simulators to model a severe accident for use during severe accident management drills/exercises.