

November 26, 2013

Anthony Pietrangelo  
Sr. Vice President & Chief Nuclear Officer  
Nuclear Energy Institute (NEI)  
1201 F Street, NW, Suite 1100  
Washington, DC 20004

SUBJECT: REQUEST FOR SUBMISSION OF INDUSTRY GUIDANCE RELATED TO  
EMERGENCY PROCEDURE GUIDELINES AND SEVERE ACCIDENT  
GUIDELINES

Dear Mr. Pietrangelo:

The purpose of this letter is to request, by January 2, 2014, that the Nuclear Energy Institute (NEI) provide the U.S. Nuclear Regulatory Commission (NRC) the industry guidance related to the Boiling Water Reactor (BWR) Owners Group's (BWROG) Revision 3 of the Emergency Procedure Guidelines/Severe Accident Guidelines (EPG/SAG Rev 3), the Pressurized Water Reactor (PWR) Owners Group's (PWROG) EPG/SAG Rev 3, and the industry-developed white paper on customization of the generic guidelines. The NRC is requesting this information to support development of: (1) implementation guidance for the Near-Term Task Force (NTTF) Recommendation 8 Onsite Emergency Response Capabilities proposed rulemaking, and (2) the regulatory basis for the NTTF Recommendation 5.1 Filtering Strategies rulemaking.

The NRC held a public meeting at the NRC headquarters on November 19, 2013, to discuss the preliminary proposed rule language guidance development for periodic training and drills, regulatory requirements for procedures and guidelines, procedure/guideline integration and command and control strategies Onsite Emergency Response Capabilities proposed rulemaking.<sup>1</sup> At this meeting, the NRC staff informally requested that industry submit the BWROG's EPG/SAG Rev 3 documents and the PWROG's EPG/SAG Rev 3 documents. Representatives from NEI indicated they were coordinating a newly-formed Emergency Response Executive Steering Committee to follow efforts related to NTTF Recommendation 8, and that this Steering Committee included senior leaders from both the BWROG and PWROG, as well as the Institute of Nuclear Power Operations (INPO) and other members of the industry. The NEI representatives suggested that they coordinate the sharing of the industry guidance with the NRC, and alluded to the Emergency Response Executive Steering Committee developing a white paper that identifies how licensees could customize the BWROG's and PWROG's EPG/SAG to their respective plants. NEI indicated that this white paper may also be useful in aiding the NRC in the development of implementation guidance for the NTTF Recommendation 8 rulemaking.

Further, as discussed at several public meetings on the Filtering Strategies rulemaking (the most recent of which was held on November 6, 2013) as the NRC develops the regulatory basis

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<sup>1</sup> The public meeting notice may be found in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML13301A744. The [www.regulations.gov](http://www.regulations.gov) docket number for the onsite emergency response capabilities rulemaking is NRC-2012-0031.

for the Filtering Strategies rulemaking,<sup>2</sup> the NRC will assess the human performance reliability under severe accident conditions. In particular, the NRC will assess the reliability of actions to maintain containment parameters necessary for effective hydrogen control and confinement of radioactive materials in a severe accident. Therefore, the NRC needs to thoroughly understand the actions to be taken, timing of the actions, equipment and instrumentation availability, and the guidance available to operators under these conditions. Industry representatives at public meetings indicated that guidance for operator actions in severe accident conditions is documented in the BWROG's EPG/SAG Rev 3. The staff has informally requested the BWROG's EPG/SAG Rev 3 during various public meetings, most recently at the September 19, 2013 public meeting.<sup>3</sup>

This letter formalizes the NRC's request for the BWROG's EPG/SAG Rev 3 documents, the PWROG's EPG/SAG Rev 3 documents, and the Emergency Response Executive Steering Committee's white paper. The NRC staff intends to hold further public meetings to discuss how these documents may be referenced in the development of draft NRC regulatory guidance for the Onsite Emergency Response Capabilities rulemaking. Further, the detailed BWROG's EPG/SAG Rev 3 documents will inform accident sequences and their quantification for the regulatory basis for the Filtering Strategies rulemaking.

If you have any questions regarding this letter, please contact Jennifer Tobin at 301-415-2328 or Aaron Szabo at 301-415-1985, the rulemaking project managers for the Onsite Emergency Response Capabilities rulemaking and the Filtering Strategies rulemaking, respectively.

**/RA/**

Sher Bahadur, Deputy Director  
Division of Policy & Rulemaking  
Office of Nuclear Reactor Regulation

Cc:

L.P. Hill, Chairman BWROG

J. Stringfellow, Chairman PWROG

Sue Perkins-Grew, Senior Director, Emergency Preparedness, NEI

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<sup>2</sup> The public meeting notice may be found in ADAMS at Accession No. ML13277A561. The [www.regulations.gov](http://www.regulations.gov) docket number for the Filtering Strategies rulemaking is NRC-2013-0075.

<sup>3</sup> The public meeting notice may be found in ADAMS at Accession No. ML13252A264.

for the Filtering Strategies rulemaking,<sup>4</sup> the NRC will assess the human performance reliability under severe accident conditions. In particular, the NRC will assess the reliability of actions to maintain containment parameters necessary for effective hydrogen control and confinement of radioactive materials in a severe accident. Therefore, the NRC needs to thoroughly understand the actions to be taken, timing of the actions, equipment and instrumentation availability, and the guidance available to operators under these conditions. Industry representatives at public meetings indicated that guidance for operator actions in severe accident conditions is documented in the BWROG's EPG/SAG Rev 3. The staff has informally requested the BWROG's EPG/SAG Rev 3 during various public meetings, most recently at the September 19, 2013 public meeting.<sup>5</sup>

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ADAMS Accession No. ML13325B094

\*via email

OFFICE	NRR/DPR	NRR/DPR	NRR/DPR	OGC/GCLR*	NRR/DPR
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DATE	11/21/13	11/22/13	11/25/2013	11/25/2013	11/26/2013

<sup>4</sup> The public meeting notice may be found in ADAMS at Accession No. ML13277A561. The [www.regulations.gov](http://www.regulations.gov) docket number for the Filtering Strategies rulemaking is NRC-2013-0075.

<sup>5</sup> The public meeting notice may be found in ADAMS at Accession No. ML13252A264.