Update on Tier 2 Activities

Emergency Preparedness

Three items related to emergency preparedness (EP) were prioritized as Tier 2. These items are:

(1) To conduct periodic training and exercises for multi-unit and prolonged station blackout (SBO) scenarios and to practice (simulate) the identification and acquisition of offsite resources, to the extent possible.

(2) To ensure that EP equipment and facilities are sufficient for dealing with multi-unit and prolonged SBO scenarios.

(3) To add guidance to the emergency plan that documents how to perform a multi-unit dose assessment (including releases from spent fuel pools) using the licensee's site-specific dose assessment software and approach.

Although items 1 and 2 above are being addressed through the implementation of mitigation strategies, on November 19, 2013, the U.S. Nuclear Regulatory Commission (NRC) staff conducted a combined public meeting with the working group for the Onsite Emergency Response Capabilities rulemaking. This meeting discussed a draft version of the Nuclear Energy Institute's (NEI's) guidance document NEI 13-06, "Guidance for the Closure of Tier 2 Emergency Preparedness Enhancements from the NRC Near-Term Task Force Report," which is intended to address emergency-preparedness equipment, facilities, training, drills, and multi-unit dose assessment. Additionally, on March 4, 2014, the staff conducted a combined public meeting with the consolidated rulemaking working group to discuss additional comments on the revised draft NEI 13-06 and the new draft NEI 14-01 "Emergency Response Procedures and Guidelines for Extreme Events and Severe Accidents." Given the level of integration between mitigation strategies, onsite emergency response procedures, and items 1 and 2 above; the staff intends to conduct additional public meetings to finalize both guidance documents. These public outreach activities also support a proposed consolidated rulemaking activity, which is further discussed in Enclosure 6 to this SECY.

In COMSECY-13-0010, "Schedule and Plans for Tier 2 Order on Emergency Preparedness for Japan Lessons Learned," dated March 27, 2013 (ADAMS Accession No. ML12339A262), the NRC staff informed the Commission that licensees would provide information about their current multi-unit/multi-source capability, or a schedule for implementing such capability for those licensees who do not currently have it, and that implementation of the dose-assessment capability would occur by the end of 2014. The staff has received all licensee submittals on this topic and issued a response letter to the majority of licensees, dated January 29, 2014 (ADAMS Accession No. ML13233A205), that acknowledges that licensees intend to have multi-unit and/or multi-source dose assessment capabilities by December 31, 2014. The staff is in the process of issuing response letters to several remaining licensees with which clarifying public teleconferences were conducted and subsequent supplemental responses were submitted to the NRC. The staff issued the remaining response letters by April 2, 2014. All response letters note that as part of the implementation of new multi-unit/multi-source

dose-assessment capabilities, there is a need for an appropriate level of site procedures and training to ensure adequate integration and licensee staff familiarity, and that implementation of dose-assessment capabilities would be verified through the inspection program.

Consideration of Other Natural External Hazards

The Advisory Committee on Reactor Safeguards recommended expanding Near Term Task Force Recommendation 2.1 to include natural external hazards other than seismic and flooding hazards in a letter dated October 13, 2011 (ADAMS Accession No. ML11284A136). The Consolidated Appropriations Act, Public Law 112-074, directed the NRC to require reactor licensees to reevaluate the external hazards at their sites and to require updates to their design basis, if necessary. Reevaluation of other natural external hazards was prioritized as a Tier 2 activity because of the lack of availability of the critical skill sets for both the NRC staff and external stakeholders, and because the staff considered the seismic and flooding reevaluations to be of higher priority.

The project plan for this activity was provided in Enclosure 3 of SECY-12-0025. The project plan calls for the staff to follow the same process as used for the Tier 1 seismic and flooding reevaluations. The NRC staff expects to restart stakeholder interactions that occurred in February 2012 to discuss the technical basis and acceptance criteria for conducting a reevaluation of site-specific external natural hazards to help define the guidelines for the application of current regulatory guidance and methodologies at operating reactors. The staff plans to develop and issue a request for information to licensees under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(f) to (1) reevaluate site-specific external natural hazards using the guidance discussed above, and (2) identify actions that have been taken, or are planned, to address plant-specific issues associated with the updated natural external hazards (including potential changes to the licensing or design basis of a plant). Licensee responses will then be evaluated and appropriate regulatory action taken to resolve issues associated with updated site-specific natural external hazards.

No work was done this period; however, the NRC staff expects to begin work on this topic as soon as significant resources become available, following implementation of Tier 1 actions related to seismic and flooding hazard walkdowns and reevaluations.