

## Kahler, Carolyn

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**From:** Kahler, Carolyn  
**Sent:** Tuesday, April 15, 2014 11:57 AM  
**To:** Johnson, Don  
**Cc:** Anderson, Joseph  
**Subject:** RE: Response from "Submit a Question about Emergency Preparedness"

Don:

Thank you for your recent submission of EPFAQ No. 2014-002 regarding NEI 10-05.

At this time, your comment has been accepted for review by appropriate NRC staff. You will be notified when EPFAQ No. 2014-002 has been added to [www.regulations.gov](http://www.regulations.gov) for a 30-day public comment period. At that time, the ADAMS accession number and Federal Register Notice docket number will be provided for your reference.

To track the status of your submitted question, please visit the website <http://www.nrc.gov/about-nrc/emerg-preparedness/faq/faq-contactus.html#status>. If you have any questions regarding submitting an EP FAQ, please feel free to contact me at [carolyn.kahler@nrc.gov](mailto:carolyn.kahler@nrc.gov) or 301-287-3722.

Sincerely,

Carolyn J. Kahler  
EP Specialist  
NSIR/DPR/ORLOB  
U.S. Nuclear Regulatory Commission  
Location: 3WFN- 9A31  
Phone: 301-287-3722  
Email: [Carolyn.Kahler@nrc.gov](mailto:Carolyn.Kahler@nrc.gov)

-----Original Message-----

From: [don.johnson@nrc.gov](mailto:don.johnson@nrc.gov) [<mailto:don.johnson@nrc.gov>]  
Sent: Thursday, April 10, 2014 9:06 AM  
To: EPFAQ Resource  
Subject: Response from "Submit a Question about Emergency Preparedness"

Below is the result of your feedback form. It was submitted by

([don.johnson@nrc.gov](mailto:don.johnson@nrc.gov)) on Thursday, April 10, 2014 at 09:06:24

through the IP 63.141.200.6

using the form at <http://www.nrc.gov/about-nrc/emerg-preparedness/faq/faq-contactus.html>

and resulted in this email to [epfaq.resource@nrc.gov](mailto:epfaq.resource@nrc.gov)

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relevant-guidance: NEI 10-05

revision-number: 0

applicable-sections: All

comments: NEI 10-05 was developed to aid in performing a detailed analysis demonstrating that on-shift personnel assigned emergency plan implementation functions are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the emergency plan, as stated in 10 CFR 50 Appendix E.IV.A.9. It was endorsed by the NRC as a possible method to meet the 10 CFR 50 Appendix E.IV.A.9, but the endorsement did not limit the methodology to only NEI 10-05. Question: Is it acceptable to use this evaluation to support licensee amendment requests (LARs) asking for NRC approval for changes to on-shift staffing assignments and/or delays in emergency response organization (ERO) augmentation?

proposed-solution: NEI 10-05 has been endorsed by the staff as a possible method for licensees to consider when assessing their on-shift staff in order to meet the requirements of 10 CFR 50 Appendix E.IV.A.9. Licensees may use this assessment to support LARs with the understanding that this assessment only evaluates whether or not the on-shift staff can perform all their assigned functions in the time period(s) expected, it does not evaluate or justify extensions, or delays, in the time when ERO staff is to relieve the on-shift crew of emergency preparedness (EP) functions so that the on-shift staff can focus on the plant and the event. LARs that deal with extensions to ERO augmentation timing must evaluate the impact a delay may have on public health and safety, i.e., what impact this extended period of time has on the ability of the on-shift staff to maintain situational awareness of the plant, and the event, while simultaneously meeting all the requirements of implementing the site emergency plan.

originator: Don Johnson

organization: USNRC

phone: 301.287.9230

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