

Kahler, Carolyn

From: Kahler, Carolyn
Sent: Wednesday, April 30, 2014 3:18 PM
To: 'MTH@nei.org'
Cc: Anderson, Joseph
Subject: RE: Response from "Submit a Question about Emergency Preparedness"

Dear Mr. Hug:

Thank you for your recent submission of EPFAQ No. 2014-004 regarding the emergency preparedness function associated with fire brigades.

At this time, your comment has been accepted for review by appropriate NRC staff. You will be notified via email when EPFAQ No. 2014-004 has been added to 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 or 301-287-3722.

Sincerely,

Carolyn J. Kahler

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NSIR/DPR/ORLOB
U.S. Nuclear Regulatory Commission
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-----Original Message-----

From: MTH@nei.org [<mailto:MTH@nei.org>]
Sent: Monday, April 28, 2014 1:24 PM
To: EPFAQ Resource
Subject: Response from "Submit a Question about Emergency Preparedness"

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

(MTH@nei.org) on Monday, April 28, 2014 at 13:23:47

through the IP 63.141.200.55

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

relevant-guidance: 10 CFR 50.48(f), 10 CFR 50.82(a)(1), 10 CFR 50.54(q)

revision-number:

applicable-sections:

comments: Question

Since the emergency preparedness function associated with the fire brigade will be maintained by meeting 10 CFR 50.48 objectives for a decommissioned site, can the changes to the fire protection plan associated with brigade staffing and offsite fire protection support also be reflected in the emergency plan without NRC preapproval using the 10CFR 50.54(q) process?

Background

Language in 10 CFR 50.48(f) allows changes to a Fire Protection Plan for licensees that have submitted the certification required under 10 CFR 50.82(a)(1). Specifically, 10 CFR 50.48(f)(3) states:

“The licensee may make changes to the fire protection program without NRC approval if these changes do not reduce the effectiveness of fire protection for facilities, systems, and equipment that could result in a radiological hazard, taking into account the decommissioning plant conditions and activities.”

Within the 10 CFR 50.48 regulation, decommissioning plants are allowed to re-evaluate the fire protection plan and when justified by the remaining potential fire induced radiological hazards change the fire brigade from a five member advanced exterior or interior structural brigade to a three member incipient fire brigade. Based upon the evaluation, offsite fire protection support maybe modified to ensure the three 10 CFR 50.48(f) objectives, listed below, continue to be met.

1. Reasonably prevent fires
2. Rapidly detect, control, and extinguish fires that could result in a radiological hazard
3. Minimize the risk of fire-induced radiological hazards to the public

Since the firefighting function is maintained, the brigade changes in question would conform to 10 CFR 50.48 and not challenge safety for decommissioned plants that have received Cessation of Operation Letters.

proposed-solution: As long as the emergency preparedness firefighting functional task is retained and all other emergency plan functions that had been performed by the two eliminated positions are retained without a reduction in effectiveness (evaluated against on-shift staffing study), the 10CFR50.54(q) process should enable conforming changes to the emergency plan based on fire protection plan changes to be administratively made using, without NRC prior approval.

Examples of these specific changes if contained in the emergency plan include:

Onsite Staffing Levels,
Off-site response,
Fire brigade composition.

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