

Kahler, Carolyn

From: Kahler, Carolyn
Sent: Wednesday, May 28, 2014 11:34 AM
To: 'MTH@nei.org'
Cc: Anderson, Joseph
Subject: RE: Response from "Submit a Question about Emergency Preparedness" (EPFAQ No. 2014-008)

Dear Mr. Hug:

Thank you for your recent submission of EPFAQ No. 2014-008 regarding the removal of statements/processes/steps/actions in EIPs that do not implement programmatic elements of the emergency plan. At this time, your comment has been accepted for review by appropriate NRC staff. You will be notified via email when EPFAQ No. 2014-008 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

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

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

From: MTH@nei.org [<mailto:MTH@nei.org>]
Sent: Sunday, May 18, 2014 1:07 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 Sunday, May 18, 2014 at 13:07:20

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

relevant-guidance:

revision-number:

applicable-sections:

comments: Question:

May a licensee that has submitted certification confirming cessation of operation and removal of fuel from the reactor vessel (Ref. 10 C.F.R. 50.82) remove certain emergency plan implementing procedure (EPIP) statements/process/steps/actions that do not implement programmatic elements described in the emergency plan?

Background:

The emergency plan identifies and describes programmatic methods necessary for maintaining emergency preparedness and responding to emergencies. These methods are known as program elements and they characterize implementation aspects of the planning standards in 10 CFR 50.47(b). They also relate to requirements in Appendix E to 10 CFR Part 50 and generally correspond to the evaluation criteria of NUREG-0654 or approved alternatives that provide specific acceptable methods for complying with the planning standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50. Such programmatic documents are subject to the 10 CFR 50.54(q) change process.

EIPs may describe processes:

- That implement programmatic elements described in the emergency plan,
- That do not implement programmatic elements described in the emergency plan.

For example, the emergency plan may specify the minimum staffing requirements of an emergency response facility. The EPIP describes the positions that comprise minimum staffing and how their duties are carried out. The EPIP may also include other staff positions and respective duties that are not described in the emergency plan. Once the NRC docket the licensee's certifications confirming cessation of operation and removal of fuel from the reactor vessel, the licensee is no longer authorized to operate the reactor or place fuel into the reactor vessel (Ref 10 C.F.R. 50.82). The emergency planning demands of defueled plants are logically and should be substantially different from the operating plants. In such cases, the station may determine the staff not listed in the emergency plan may no longer be needed and the requirement for the staff removed from the EPIP.

proposed-solution: Licensee may remove statements/processes/steps/actions in EIPs that do not implement programmatic elements of the emergency plan. This change can be made outside the 50.54(q)(3) process.

originator: Martin Hug

organization: Nuclear Energy Institute (NEI)

phone: 202.739.8129
