

July 15, 2014

MEMORANDUM TO: James W. Andersen, Deputy Director
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

FROM: Robert E. Kahler, Chief **/RA/**
Inspection and Regulatory Improvements Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

SUBJECT: SUMMARY OF JUNE 25, 2014 CATEGORY 3 FOLLOW-UP
PUBLIC MEETING TO DISCUSS PRELIMINARY DRAFT
CHANGES TO NUREG-0654/FEMA-REP-1

On June 25, 2014, a Category 3 public meeting was held by the U.S. Nuclear Regulatory Commission (NRC), in conjunction with the Federal Emergency Management Agency (FEMA), to engage stakeholders and the public regarding preliminary draft changes to NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." The meeting was held with organizational stakeholders and members of the public attending at NRC offices, 11545 Rockville Pike, Rockville, MD 20852, or remotely participating via webinar and teleconference. A listing of meeting participants is contained in the enclosure.

The purpose of the meeting was to offer stakeholders and the public an opportunity to discuss preliminary draft changes to Section I, "Introduction," of NUREG-0654/FEMA-REP-1 with NRC and FEMA staff before issuing draft Revision 2 of NUREG-0654/FEMA-REP-1 for formal public comment, which is currently scheduled for October 2014. Meeting participants were also afforded the opportunity to give feedback on changes made to evaluation criteria associated with each emergency preparedness (EP) planning standard in Section II, "Planning Standards and Evaluation Criteria," of NUREG-0654/FEMA-REP-1. The changes to the evaluation criteria were based in part on feedback provided by stakeholders and the public during a public meeting held on October 29-31, 2013 (refer to the meeting summary located in the NRC Agencywide Documents Access and Management System (ADAMS) under ADAMS Accession No. ML13323B313). The preliminary draft Sections I and II of NUREG-0654/FEMA-REP-1 for discussion at the June 25, 2014 meeting were made publicly available on June 13, 2014 (ADAMS Accession No. ML14163A605).

CONTACT: Don Tailleart, NSIR/DPR
(301) 287-9257

The meeting agenda consisted of the following as described in the meeting notice dated May 28, 2014 (ADAMS Accession No. ML14085A527):

| | | |
|------------------|---|------------|
| 12:30 – 12:45 pm | Introductions / Opening Remarks | ALL |
| 12:45 – 1:15 pm | Discussion of Changes to Section I (Introduction) | NRC / FEMA |
| 1:15 – 2:15 pm | Public Comment Opportunity | ALL |
| 2:15 – 2:30 pm | BREAK | |
| 2:30 – 3:00 pm | General Overview of Changes to Section II (Planning Standards and Evaluation Criteria) | NRC/FEMA |
| 3:00 – 3:45 pm | Public Comment Opportunity | ALL |
| 3:45 – 4:00 pm | Summary / Closing Remarks | NRC / FEMA |

After NRC and FEMA staff presented a brief overview of proposed changes to Section I, including new topics that were added, and a new EP manual the NRC is developing to give amplifying guidance to the content of NUREG-0654/ FEMA-REP-1, stakeholders and members of the public were engaged in a discussion of the proposed changes. Some key points raised during this discussion included the following:

- Additional guidance should be provided for dose projection models at nuclear power plant sites with complex topography and meteorological conditions.
- Integration of radiological EP programs with all hazards programs as suggested in Section I will be difficult.
- More correct terminology for referring to Tribal entities should be used.
- A summary of changes to Section I should be included when the document is issued for formal public comment.
- Information on the use of alternative approaches to NUREG-0654/ FEMA-REP-1, Revision 2, should be consolidated into one part of Section I and further clarified.
- Clarification on the continued use of Revision 1 after Revision 2 of NUREG-0654/ FEMA-REP-1 is issued for use should be provided.
- The basis and references for time factors associated with radiological releases following a nuclear power plant accident should be included.
- The use of results from more recent NRC studies, such as the State-of-the-Art Reactor Consequence Analyses, should be used to inform and update the EP planning basis if appropriate.
- Information on the use of the document for decommissioning sites should be provided.
- The use of the threat and hazard identification and risk assessment process in conjunction with NUREG-0654/ FEMA-REP-1 should be clarified.
- References to other EP-related guidance documents should be included rather than restating or discussing the content of these documents in Section I of NUREG-0654/ FEMA-REP-1.

Several remarks on the specific wording of parts of Section I were also provided.

Following the break, NRC and FEMA staff summarized changes made to the evaluation criteria in Section II. The number of proposed evaluation criteria was reduced from 381 (as of October 2013) to 202 based on refocusing the criteria on overall EP program capabilities and relocating detailed information to other NRC and FEMA EP guidance documents. Some general observations on the overall format of Section II were provided by participants, including consideration of the following:

- indicating those evaluation criteria that would be applicable to Federal agencies;
- removing colors from the boxes showing applicability to licensees and offsite agencies; and
- maintaining the format for showing applicability used in Revision 1 of NUREG-0654/FEMA-REP-1.

Specific remarks were discussed on several evaluation criteria, including clarification of the information found in Table B-1, "Emergency Response Organization (ERO) Staffing and Augmentation Plan," and clarification of several drill and exercise-related criteria found under Planning Standard N, "Exercises and Drills."

Additional feedback can also be sent to the following FEMA email address: THD.resource@fema.dhs.gov. NRC and FEMA staff will consider this feedback in determining if any additional changes to Sections I and II are warranted; however, no written responses to the feedback will be given.

Enclosure: Listing of Meeting Participants

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Enclosure: Listing of Meeting Participants

DISTRIBUTION:

DPR r/f CKahler JAndersen RKahler JAnderson DTailleart

ADAMS Accession Number: ML14195A142

***VIA E-Mail**

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|--------|----------------|-------------------|-------------------|-------------------|
| OFFICE | ORLOB:DPR/NSIR | TL: IRIB/DPR/NSIR | BC:ORLOB/DPR/NSIR | BC: IRIB/DPR/NSIR |
| NAME | CKahler | DTailleart* | JAnderson | RKahler |
| DATE | 7/14/2014 | 7/14/2014 | 7/14/2014 | 7/15/2014 |

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June 25, 2014 NUREG-0654/FEMA-REP-1, Rev. 2 Public Meeting Participants

| Last Name | First Name | Organization | Tele or Meeting |
|------------------|-------------------|---|------------------------|
| Albanese | Raymond | | Teleconference |
| Allard | David | PA Dept. of Environmental Protection | Teleconference |
| Almahamid | Ilham | NY State Dept of Health | Teleconference |
| Anderson | Joseph | NRC | Meeting |
| Anderson | Paul | FEMA Region IX REP | Teleconference |
| Angil | John | State of Vermont | Teleconference |
| Atkins | Barry | | Teleconference |
| Baker | Pamela | NRC | Meeting |
| Barry | Chris | New Jersey Department of Environmental Protection | Teleconference |
| Bates | Kerris | FEMA | Teleconference |
| Baxley | Roy | Institute of Nuclear Power Operations | Teleconference |
| Bergman | Jana | Sciencetech | Meeting |
| Bright | Mary | State of South Carolina | Teleconference |
| Brinser | Alan | PA Emergency Management Agency | Teleconference |
| Brunson | Douglas | Duke Energy | Teleconference |
| Burgin | David | PSEG | Teleconference |
| Campesi | Gian-Joseph | | Teleconference |
| Carpena | Sonia | Arizona Radiation Regulatory Agency | Teleconference |
| Cederberg | Katharine | MA Emergency Management | Teleconference |
| Christiansen | Jon | | Teleconference |
| Clark | Jeffrey | | Teleconference |

Enclosure

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|-------------|---------|-------------------------------------|----------------|
| Collins | Jerry | NY State Dept of Health | Teleconference |
| Colman | Steve | FEMA | Teleconference |
| Cornell | Anita | State of Wisconsin | Teleconference |
| Costello | Cindy | NYS Dept of Health | Teleconference |
| Costello | John | Dominion | Meeting |
| Cowley | Richard | Washington Department of Health | Teleconference |
| Craig | Bill | Utah Division of Radiation Control | Teleconference |
| Crozier | David | Palo Verde Nuclear | Teleconference |
| Cullen | William | | Teleconference |
| Dabbraccio | Paul | | Teleconference |
| Dailey | Quinton | Alabama Emergency Management Agency | Teleconference |
| Dissinger | Charles | Entergy | Teleconference |
| Dolley | Steve | Inside NRC Managing Editor | Teleconference |
| Dunkerley | Heather | State of New Hampshire | Teleconference |
| Dunn-Bytner | Stacy | NY State Emergency Management | Teleconference |
| Eberst | Bill | FEMA | Meeting |
| Egdorf | John | Dominion | Teleconference |
| Eriksson | Nancy | | Teleconference |
| Evans | Ken | Illinois Emergency Management | Teleconference |
| Fahnestock | AJ | | Teleconference |
| Fischer | Staci | Duke Energy | Teleconference |
| Fisher | Shannon | Orange County Emergency Services | Teleconference |
| Flickenger | Steve | Exelon | Meeting |
| Gamble | Katie | | Teleconference |
| Gearing | Alexis | ICF International | Teleconference |
| Gormsen | Liz | ICF International | Meeting |

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|-------------|---------|--|----------------|
| Grant | Judy | Southern Nuclear Operating Company | Teleconference |
| Greenwood | Bryan | Rhode Island Emergency Management | Teleconference |
| Griffen | Michael | Maryland Dept of Environment | Teleconference |
| Harrison | Steven | State of Virginia | Teleconference |
| Hasemann | Brian | | Teleconference |
| Hawkinson | John | Enercon | Teleconference |
| Hisamichi | Nanako | Washington Core | Meeting |
| Hittle | Garrett | Susquehanna EP | Teleconference |
| Hug | Martin | NEI | Meeting |
| Hutchins | Lauren | NRC | Meeting |
| Kahler | Bob | NRC | Meeting |
| Kahler | Carolyn | NRC | Meeting |
| Kanati | Rich | | Teleconference |
| Keyes | Kevin | FEMA Region IV | Teleconference |
| Keyes | Max | STP Emergency Response | Teleconference |
| Kidwell | Bob | Enercon | Teleconference |
| Kinard | Rick | NRC | Meeting |
| Kuhr | Tina | Duke Energy | Teleconference |
| Laughlin | Jeff | NRC | Meeting |
| Leshinskie | Anthony | Vermont Public Service Department | Teleconference |
| Leszczynski | Mark | Monroe County | Teleconference |
| Leuer | Kevin | Minnesota Homeland Security and Emergency Management | Teleconference |
| Lewis | Rob | NRC | Meeting |
| Lynne | Zack | | Teleconference |
| MacEvoy | Frank | ICF International | Teleconference |
| Mantz | Allen | Ocean County Sherriff's Dept (EM) | Teleconference |
| McDaniel | Sarah | Crystal River Unit 3 | Teleconference |

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|-------------|---------|---|----------------|
| McRoberts | Julia | VDH, Office of Radiological Health | Teleconference |
| Meilahn | Susan | State of Wisconsin | Teleconference |
| Merritt | Andi | ICF International | Teleconference |
| Mulligan | Patrick | CRCPD | Meeting |
| Noecker | Robert | ICF International | Meeting |
| Oakley-Lisk | Pamela | Duke Energy | Teleconference |
| Perdomo | Richie | Maricopa County Emergency Management | Teleconference |
| Pfaff | Ann | New Jersey Department of Environmental Protection | Teleconference |
| Prior | Kevin | MA Emergency Management | Teleconference |
| Rankin | Roger | FL Emergency Management | Teleconference |
| Ray | Monica | EP Consulting LLC | Teleconference |
| Reed | Kevin | | Teleconference |
| Renz | Bill | Entergy | Teleconference |
| Rice | John | FEMA Region I REP | Teleconference |
| Robinson | Edward | NRC | Meeting |
| Roham | Dave | MA Emergency Management | Teleconference |
| Rose | Dan | Delaware Emergency Management Agency | Teleconference |
| Rothstein | Richard | Town of Plymouth Nuclear Matters Committee | Teleconference |
| Sawtschenko | Steve | Beaver Valley Power Station | Teleconference |
| Schwartz | Paul | New Jersey Department of Environmental Protection | Teleconference |
| Sharp | Charles | Black Emergency Managers Association | Meeting |
| Smith | Charles | New Hanover County | Teleconference |
| Smith | Todd | NRC | Meeting |
| Sousa | Rob | State of Massachusetts | Teleconference |
| Standridge | John | Entergy - Fitzpatrick NPP | Teleconference |
| Stanley | Rick | State of South Carolina | Teleconference |
| Stasolla | Steve | | Teleconference |
| Suarez | Diego | Columbia Generating Station | Teleconference |

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|----------------|---------|--|----------------|
| Suarez | Kenyi | Massachusetts Emergency Management Agency | Teleconference |
| Swartz | Robert | | Teleconference |
| Sweitzer | Mark | Cecil County Department of Emergency Services | Teleconference |
| Tailleart | Don | NRC | Meeting |
| Tangney | Cindy | Connecticut Emergency Management | Teleconference |
| Threatt | Sandra | SC Department of Health and Environmental Control | Teleconference |
| Tifft | Doug | NRC | Teleconference |
| Tissinger | Charles | | Teleconference |
| Tkaczyk | Lori | Enercon | Teleconference |
| Toye | James | NH Emergency Management | Teleconference |
| Turner | Richard | State of Arizona | Teleconference |
| Tynan | Matt | Hogan Lovells US LLP | Teleconference |
| Upfold-Harrell | Sara | Oswego County EM | Teleconference |
| Viveiros | John | MA Emergency Management | Teleconference |
| Volvarez | John | | Teleconference |
| Vonk | Marty | EP Consulting LLC | Teleconference |
| Walker | Rae | Texas Dept of State Health Services | Teleconference |
| Whicker | Zakare | NC Department of Public Safety (EM) | Teleconference |
| Wiley | JiYoung | LA Radiological Emergency Planning and Response | Teleconference |
| Williams | Kevin | NRC | Meeting |
| Wolfe | Bill | Arizona Department of Emergency and Military Affairs | Teleconference |
| Wright | Chuck | | Teleconference |
| Young | David | NEI | Meeting |

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