

Emergency Preparedness Aspects

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Challenging Drills and Exercises

- Revision to 10 CFR Part 50, Appendix E (Section IV.F.2)
 - Ensure licensees develop and maintain necessary skills for emergency response through drills and exercises
- Enhanced drill and exercise programs by:
 - Wider range of scenario elements
 - Hostile Action-Based
 - Initial classification, or rapid escalation to, a Site Area / General Emergency
 - No release or unplanned minimum release
 - 8-Year Exercise Cycle (vs. previous 6-Year Cycle)
 - NRC review of biennial exercise scenarios
 - Principal Functional Areas / Key Skills
 - Remedial exercise requirement

Challenging Drills and Exercises

Guidance (NSIR/DPR-ISG-01):

<http://pbadupws.nrc.gov/docs/ML1130/ML113010523.pdf>

- Scenario Elements for Each Exercise
- Scenario Elements During Each Cycle
- Scenario Elements for Drills
- Hostile Action Exercises (NEI 06-04, Rev. 2)
 - Appendix A, “Drill and Exercise Objectives”

Challenging Drills and Exercises

NEW Inspection Procedures (IP) 71114, “Reactor Safety Emergency Preparedness”

- IP 71114.07, Exercise Evaluation - Hostile Action (HA) Event
<http://pbadupws.nrc.gov/docs/ML1210/ML12100A229.pdf>
- IP 71114.08, Exercise Evaluation – Scenario Review
<http://pbadupws.nrc.gov/docs/ML1219/ML12191A249.pdf>

BDBEE Rulemaking

- Consolidated rulemaking effort for responding to a prolonged, beyond design basis external event (BDBEE) affecting all units on-site
 - NNTF Recommendation 4 (Mitigating Strategies)
 - NNTF Recommendation 8 (Enhancements to Onsite Emergency Response Procedures)
 - NNTF EP Recommendations related to:
 - Staffing
 - Training
 - Communications
 - Facilities and Equipment
 - Multi-Unit/Multi-Source
 - Command and Control
 - Dose Assessment
 - Drills/Exercises
 - ERDS Modernization

BDBEE Rulemaking

Status:

- Concept approved by Commission (SECY-14-0046)
- Final Rule by December 2016 (*currently proposed*)
- Opportunity for public and industry feedback on proposed rulemaking moving forward

BDBEE Rulemaking

- **NEI seeking NRC endorsement of:**
 - NEI 13-06, “Enhancements to Emergency Response Capabilities for Beyond Design Basis Accidents and Events”
 - NEI 14-01, “Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents”
- **NRC has already endorsed:**
 - NEI 12-01, “Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities”
 - NEI 12-06, “Diverse and Flexible Coping Strategies (FLEX) Implementation Guide”

NUREG-0654/FEMA-REP-1

Revision

Overall Objectives

- Update, simplify, and consolidate guidance
- Focus on planning standards and evaluation criteria
- Maintain onsite/offsite linkage
- Clarify document usage
- Cause no impact on reasonable assurance
- Require limited rulemaking to support revision
- Have minimal impact on end users

NUREG-0654/FEMA-REP-1 Revision

Timeline

2013–2014
Draft Rev. 2
Development

2016
Draft Rev. 2
Rewrite and
Second Public
Comment
Period

2014–2015
Distribution of
Draft Rev. 2 for
Public Comment
and Comment
Adjudication

2017
Final Rev. 2
Issuance and
Implementation

NUREG-0654/FEMA-REP-1 Revision

EP Guidance Documents

Pre-2011

NUREG-0654/FEMA-REP-1
Rev. 1 (Final 1980)

NUREG-0654/FEMA-REP-1
Supplement 1 (Final 1988)

NUREG-0654/FEMA-REP-1
Supplement 2 (Draft 1996)

NUREG-0654/FEMA-REP-1
Supplement 3 (Draft 1996)

NUREG-0654/FEMA-REP-1
Addenda (Final 2002)

REPP Manual
(Interim 2002)

Dec 2011

NUREG-0654/FEMA-REP-1
Rev. 1 (Final 1980)

NUREG-0654/FEMA-REP-1
Supplement 1 (Final 1988)

NSIR/DPR-ISG-01
Interim Staff Guidance

NUREG-0654/FEMA-REP-1
Supplement 2 (Draft 1996)

NUREG-0654/FEMA-REP-1
Supplement 3

NUREG-0654/FEMA-REP-1
Addenda (Final 2002)

NUREG-0654/FEMA-REP-1
Supplement 4

REPP Manual

2017

NUREG-0654/FEMA-REP-1
Rev. 2

REPP Manual
(Update)

NRC EP Manual
(New Document)

NUREG-0654/FEMA-REP-1

Revision

New NRC EP Manual

- Document Content and Hierarchy
 - Amplifying Guidance for Evaluation Criteria
 - Level of Detail in Emergency Plans
 - Examples of Acceptable Approaches
 - Consolidation of Other EP Guidance
- Key Milestones
 - 10/2014: Prelim. Draft Publicly Available (No Comments)
 - 02/2015: Start of Public Comment Period
 - 02/2016: Start of Optional Public Comment Period
 - 2017: Issuance and Implementation Sessions

Regulatory Basis

- **Why not a License Amendment?**
 - 10 CFR 50.90 (amendment) applies to licensees seeking to change their license conditions in how they comply with regulations
 - 10 CFR 50.54(q)(4) requires a licensee to submit a license amendment for emergency plan changes that reduce the effectiveness of the plan
- 10 CFR 50.12 (exemption) applies to licensees seeking regulatory relief – no longer needs to comply with regulation

Change Processes

- 10 CFR 50.59, “Changes, Tests, and Experiments”
 - Outlines process for making changes to facility or procedures
 - Provisions do not apply when applicable regulations establish more specific criteria

- 10 CFR 50.54, “Conditions of Licenses”
 - (q) – Emergency plans
 - Regulatory Guide (RG) 1.219, “Guidance on Making Changes to Emergency Response Plans for Nuclear Power Plants”

NRC Web Page

<http://www.nrc.gov/about-nrc/emerg-preparedness.html>

- About Emergency Preparedness
 - About Emergency Response
 - How Can I Prepare for a Radiological Emergency?
 - What Do I Do in a Nuclear Emergency?
 - Public Meetings and Workshops
 - Rulemaking Activities
 - Regulations, Guidance, and Generic Communications
 - Related Information and Other Resources
 - Newsletter
- Key Topics**
- Emergency Preparedness Exercise Schedule
 - FEMA After Action Reports
 - Emergency Action level Development
 - EP Frequently Asked Question Process

NRC /FEMA MOU

(Appendix A to 44 CFR 353)

- **Federal Emergency Management Agency**
 - Coordinates all Federal planning for the offsite impact of radiological emergencies
 - Leads for assessment of offsite radiological emergency response plans and preparedness
 - Makes findings and determinations as to adequacy and capability of implementing offsite plans
- **Nuclear Regulatory Commission**
 - Reviews FEMA's findings and determinations, in conjunction with NRC onsite findings, for the purpose of making determinations on the state of overall emergency preparedness

NRC /FEMA MOU

(Appendix A to 44 CFR 353)

- Background and Purpose
- Authorities and Responsibilities
- Areas of Cooperation:
 - NRC Licensing Reviews
 - FEMA Review of Offsite Plans and Preparedness
 - Preparation for and Evaluation of Joint Exercises
 - Withdrawal of Reasonable Assurance Finding
 - Emergency Planning and Preparedness Guidance
 - On-going NRC Research and Development Programs
 - Public Information and Education Programs
 - Recovery From Disasters Affecting Offsite EP
- NRC/FEMA Steering Committee

Perspectives (Open Discussion)

- Compliance Vs. Excellence
- Regulatory / Licensee Interface

Thank You

