

## Update on Tier 2 Activities

### Emergency Preparedness

The U.S. Nuclear Regulatory Commission (NRC) prioritized three items related to emergency preparedness (EP) as Tier 2. These items are:

- (1) To conduct periodic training and exercises for multi-unit and prolonged station blackout (SBO) scenarios and to practice (simulate) the identification and acquisition of offsite resources, to the extent possible;
- (2) To ensure that EP equipment and facilities are sufficient for dealing with multi-unit and prolonged SBO scenarios; and
- (3) To add guidance to the emergency plan that documents how to perform a multi-unit dose assessment (including releases from spent fuel pools) using the licensee's site-specific dose-assessment software and approach.

Although items 1 and 2 above are being addressed through the implementation of mitigation strategies, on November 19, 2013, the NRC staff conducted a combined public meeting with the working group for the Onsite Emergency Response Capabilities rulemaking. This meeting discussed a draft version of the Nuclear Energy Institute's (NEI's) guidance document NEI 13-06, "Guidance for the Closure of Tier 2 Emergency Preparedness Enhancements from the NRC Near-Term Task Force Report [NTTF]," which is intended to address EP equipment, facilities, training, drills, and multi-unit dose assessment. Additionally, on March 4, 2014, the staff conducted a combined public meeting with the consolidated rulemaking working group to discuss additional comments on the revised draft of NEI 13-06, now titled "Enhancements to Emergency Response Capabilities for Beyond Design Basis Accidents and Events," and the new draft document NEI 14-01 "Emergency Response Procedures and Guidelines for Extreme Events and Severe Accidents." Given the level of integration between mitigation strategies, onsite emergency-response procedures, and items 1 and 2 above, the staff intends to conduct additional public meetings to finalize both guidance documents. The staff has consolidated the Station Blackout Mitigation Strategies rulemaking with the Onsite Emergency Response Capabilities rulemaking, as well as the portions of NTTF Recommendations 9, 10, and 11 that are already being addressed as part of the Mitigating Strategies Order (NRC Order EA-12-049) implementation (NTTF Recommendation 4.2), NTTF Recommendation 8, and items already being implemented by industry, in accordance with the Commission staff requirements memorandum that approved the staff's proposal in Enclosure 6 to COMSECY-14-0046 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14190A347). The staff conducted a public meeting to discuss NEI 13-06 and NEI 14-01 and the proposed consolidated rulemaking on August 26, 2014.

In COMSECY-13-0010, "Schedule and Plans for Tier 2 Order on Emergency Preparedness for Japan Lessons Learned," dated March 27, 2013 (ADAMS Accession No. ML12339A262), the NRC staff informed the Commission that licensees would provide information about their current multi-unit/multi-source capability (or a schedule for implementing such capability for

those licensees who do not currently have it) and that implementation of the dose-assessment capability would occur by the end of 2014. The staff received all licensee submittals on this topic and issued a response letter to the majority of licensees, dated January 29, 2014 (ADAMS Accession No. ML13233A205), that acknowledges that licensees intend to have multi-unit and/or multi-source dose-assessment capabilities by December 31, 2014. The staff issued the response letters by April 2, 2014, to the remaining licensees, with whom clarifying public teleconferences were conducted and from whom subsequent supplemental responses were submitted to the NRC. All response letters note that as part of the implementation of new multi-unit and multi-source dose-assessment capabilities, there is a need for an appropriate level of site procedures and training to ensure adequate integration and licensee staff familiarity, and that implementation of dose-assessment capabilities would be verified through the inspection program.

#### Consideration of Other Natural External Hazards

By letter dated October 13, 2011 (ADAMS Accession No. ML11284A136), the Advisory Committee on Reactor Safeguards recommended expanding NTTTF 2.1 to include natural external hazards other than seismic and flooding hazards. The Consolidated Appropriations Act, Public Law 112-074, directed the NRC to require reactor licensees to reevaluate the external hazards at their sites and to require updates to their design basis, if necessary. Reevaluation of other natural external hazards was prioritized as a Tier 2 activity because of the lack of availability of the critical skill sets on the part of both the NRC staff and external stakeholders, as well as because the staff considered the seismic and flooding reevaluations to be of relatively higher priority.

The project plan for this activity was provided in Enclosure 3 of SECY-12-0025. The project plan calls for the NRC staff to follow the same general process as used for the Tier 1 seismic and flooding reevaluations. The staff expects to restart stakeholder interactions that occurred in February 2012 to discuss the technical basis and acceptance criteria for conducting a reevaluation of site-specific external natural hazards to help define the guidelines for the application of current regulatory guidance and methodologies at operating reactors. As with the reevaluations of seismic and flooding hazards, the staff is assessing how the revised estimates for other external events will be addressed within requirements for mitigating strategies for beyond-design-basis external events and possible plant-specific modifications.

The NRC staff held no public meetings or produced any project-significant documents during the last 6 months. However, the staff expects to begin work on this topic as soon as significant resources become available, following implementation of Tier 1 actions related to seismic- and flooding-hazard walkdowns and reevaluations.