

# PUBLIC SUBMISSION

As of: 1/21/15 10:09 AM  
Received: January 16, 2015  
Status: Pending\_Post  
Tracking No. 1jz-8gns-9ura  
Comments Due: January 20, 2015  
Submission Type: Web

**Docket:** NRC-2014-0267  
Draft Emergency Preparedness Frequently Asked Questions

**Comment On:** NRC-2014-0267-0001  
Draft Emergency Preparedness Frequently Asked Questions

**Document:** NRC-2014-0267-DRAFT-0004  
Comment on FR Doc # 2014-29749

12/19/2014  
79FR 75845

1

## Submitter Information

**Name:** Martin Hug  
**Address:**  
1201 F Street, NW  
Suite 1100  
Washington, DC, 20004  
**Email:** mth@nei.org

RECEIVED

2015 JAN 21 AM 10:15

RULES AND DIRECTIVES  
EMERGENCY  
12/19/14

## General Comment

Comments attached

## Attachments

01-16-15\_NRC\_Comments on EP FAQ No. 2014-003

SUNSI Review Complete  
Template = ADM - 013  
E-RIDS= ADM-03  
Add= E. Robinson (EXR2)

**Comments on Emergency Preparedness Frequently Asked Question (EPFAQ)  
No. 2014-003**

**(79 FR 75845, dated December 19, 2014; Docket ID NRC-2014-0267)**

## **NRC EPFAQ 2014-003 Response**

### **Markup 1 of NRC Draft Response**

Page 3, Emergency Action Level (EAL) PD-AU1.1:

1. PD-AU1.1 Reading on ANY (site-specific) effluent radiation monitor that is greater than the reading shown for 60 minutes or longer:

(site-specific monitor list and threshold values)

### **Basis for the Proposed Change**

An instruction, to the EAL developer, to add a list of site-specific monitors and threshold values is warranted.

Addition of a site-specific monitor list and threshold values instruction makes this EAL consistent with the operational EAL of a similar nature, AU1 in NEI 99-01, Revision 6, *Development of Emergency Action Levels for Non-Passive Reactors*.

### **Markup 2 of NRC Draft Response**

Page 3, Basis: second paragraph, second sentence:

The gaseous release portion ~~if~~ of this IC (detected either by an effluent monitor or by sample analysis) is not based on ~~and any~~ particular ODCM values of ~~does~~ dose or dose rate but rather the radiological release that results from damage to a fuel assembly and cannot be controlled.

### **Basis for the Proposed Change**

Editorial

## **Markup 3 of NRC Draft Response**

Page 5, EAL PD-AA1.1:

1. PD-AA1.1 Reading on ANY (site-specific) effluent radiation monitor that is greater than the reading shown for 60 minutes or longer:

(site-specific monitor list and threshold values)

### **Basis for the Proposed Change**

An instruction, to the EAL developer, to add a list of site-specific monitors and threshold values is warranted.

Addition of a site-specific monitor list and threshold values instruction makes this EAL consistent with the operational EAL of a similar nature, AA1 in NEI 99-01, Revision 6, *Development of Emergency Action Levels for Non-Passive Reactors*.