
POLICY ISSUE

Information

November 5, 2015

SECY-15-0140

FOR: The Commissioners

FROM: Victor M. McCree */RA/*
Executive Director for Operations

SUBJECT: ANNUAL UPDATE ON THE STATUS OF EMERGENCY
PREPAREDNESS AND INCIDENT RESPONSE PROGRAM
ACTIVITIES

PURPOSE:

The purpose of this paper is to update the Commission on the U.S. Nuclear Regulatory Commission's (NRC's) emergency preparedness (EP) and incident response (IR) program activities for fiscal year (FY) 2015, and provide an assessment of the NRC's EP and IR programs with a focus on current and projected activities. This paper does not address any new commitments or resource implications.

SUMMARY:

The NRC's EP and IR program and activities continue to align well with the agency's strategic security and safety goals. During FY15, the staff completed multiple complex EP licensing and oversight actions (including actions for four decommissioning reactor sites), participated in a national level exercise Southern Exposure 2015 (SE-15), and produced several guidance documents that represent the culmination of multi-year efforts. Throughout these activities, the NRC maintained a strong partnership with the Federal Emergency Management Agency (FEMA), emergency management community, and other domestic and international stakeholders.

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BACKGROUND:

In the staff requirements memorandum (SRM) for SECY-05-0010, "Recommended Enhancements of Emergency Preparedness and Response at Nuclear Power Plants in Post- 9/11 Environment," the Commission directed the staff to provide a semi-annual report on important EP and IR activities (Agencywide Documents Access and Management System (ADAMS) Accession No. ML051250012). In SECY-07-0182, "Semi-Annual Update on the Status of Emergency Preparedness Activities," dated October 19, 2007, the staff requested a change in the frequency of this report from semi-annual to annual (ADAMS Accession No. ML072500323). In the SRM to SECY-07-0182, dated December 21, 2007 (ADAMS Accession No. ML073550647), the Commission approved the staff's request and provided the following direction:

The annual paper should become more of a self-assessment and communication tool, perhaps summarizing accomplishments and providing a status on improvement initiatives within our EP and IR programs. Such an assessment should be coordinated with and not overlap the Reactor Oversight Process (ROP) self-assessment of the EP cornerstone, and should be designed to aid the staff in effecting continuous and coordinated improvements to the overall EP and IR program, as well as to inform the Commission and the public of progress.

DISCUSSION:

This paper provides an update on the FY15 major activities of the NRC's EP and IR program, including NRC's regulatory oversight of licensee programs, and NRC's internal preparedness to respond to events. The discussion that follows is organized by product lines (PL) in the NRC's 2015 budget structure, which includes licensing, oversight, rulemaking, event response, and international. Notable EP and IR accomplishments, program status, and improvements relevant to these PLs are described for each business line.

Key improvement initiatives and management goals for the EP and IR programs for FY15 included: maintaining readiness of the NRC response organization and operations centers; enhancing preparedness and response guidance; ensuring clear expectations and compatibility with stakeholders and broader all-hazards approaches; and preparing for and conducting SE-15. The accomplishments described below demonstrate a clear nexus to these goals.

Licensing - EP Casework

The Office of Nuclear Security and Incident Response (NSIR) serves as a centralized agency resource for EP licensing support and technical reviews for operating reactors, new reactors, independent spent fuel storage installations, materials licensees, and fuel facilities.

In 2015, the staff processed a significant number of EP-related licensing action requests, including a significant effort in support of exemption and amendment requests for recent decommissioning power reactor facilities. The staff completed eight technical evaluations for fuel cycle facility EP submittals, 29 technical evaluations related to operating reactor EP submittals, and worked closely with industry to plan and prioritize an expected increase in the number of submittals in 2016. The focus of several 2015 EP licensing actions was on the licensees' adoption of recent NRC-endorsed guidance on emergency action level (EAL)

scheme changes and amendments that address on-shift staffing and emergency response organization staffing augmentation. The NRC-endorsed guidance on EAL scheme changes incorporated lessons-learned and enhancements to the event classification methodology. Further, these amendments incorporated proposed efficiencies and promoted better industry consistency in staffing. In the coming months, the staff expects to continue to receive license amendment applications requesting similar EAL scheme changes, adoption of common "fleet" EP plans and consolidation of licensee emergency plans for the V.C. Summer and Vogtle sites. The purpose of aligning fleet EP plans for the operating reactor units and combined license (COL) units that are currently under construction is to obtain greater commonality and efficiencies in maintaining and implementing their EP programs.

In 2015, the staff completed the review of three decommissioning EP exemption requests and the associated EP license amendment requests (LAR). These included the reviews for the permanently shut-down and defueled reactors for Kewaunee, Crystal River, and San Onofre. The staff is in the final stages of its review of Entergy Nuclear Operations' requested exemptions for Vermont Yankee and is expected to complete its review in the first quarter of FY16. The reviews were notable because they were the first decommissioning EP exemptions and license amendments since the late 1990s. The staff reviews are described in SECY-14-0066, SECY-14-0118, SECY-14-0144, and SECY-14-0125 (ADAMS Accession Nos. ML14072A257, ML14219A444, ML14251A554, and ML14227A711, respectively); and the Commission's direction is given in their associated SRMs.

To provide guidance and clear expectations for the technical and regulatory review process, the staff issued NSIR/DPR-ISG-02, "Interim Staff Guidance (ISG) on Emergency Planning Exemption Requests for Decommissioning Nuclear Power Plants," on May 11, 2015 (ADAMS Accession No. ML13304B442). The ISG provides a technical discussion and staff guidance for reviewing emergency planning exemption requests, as discussed above, and proposed changes to the licensee's emergency plan associated with the requested exemptions. In developing this guidance, the staff used recent exemption review experience. NSIR also actively supports the Decommissioning Transition Working Group to share best practices and lessons-learned.

With respect to new reactor projects, the staff continues to coordinate on EP reviews of COL applications, early site permit (ESP) applications, and new reactor design certification applications. In addition, NSIR staff served as members of the transition of the new reactor oversight working group; the Regulatory Guide 1.206 update working group; the standardized inspections, tests, analyses, and acceptance criteria working group; and the inspections, tests, analyses, and acceptance criteria hearing procedures working group. In keeping with the staff's plans as outlined in SECY-11-0152, "Development of an Emergency Planning and Preparedness Framework for Small Modular Reactors," dated October 28, 2011 (ADAMS Accession No. ML112570439), the staff transmitted SECY-15-0077, "Options for Emergency Preparedness for Small Modular Reactors and Other New Technologies," dated May 29, 2015 (ADAMS Accession No. ML15037A176), to the Commission. In addition to the aforementioned activities, the staff completed the Chapter 13.3 and Chapter 14.3 inputs for the safety evaluation report for the Detroit Edison Fermi Unit 3 COL, South Texas Project COL, and Public Service Enterprise Group ESP application reviews. Also, the staff continues to support EP reviews of construction permit applications for medical isotope production facilities, including SHINE Medical Technologies and Northwest Medical Isotopes.

Licensing - Near-Term Task Force (NTTF) EP Activities

The staff completed its assessment of licensee responses to the NRC's March 12, 2012, letters issued under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(f) regarding communications and Phase I staffing for a station blackout (SBO) event affecting multiple units. The staff is currently reviewing licensees' Phase II staffing assessments on SBO coping strategies developed in response to Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design Basis External Events," dated March 12, 2012 (ADAMS Accession No. ML12054A736). The staff also completed its review of licensee responses regarding their planned multi-unit, multi-source dose assessment capability and determined that all licensees had this capability.

On January 28, 2014, the NRC's Fukushima Steering Committee endorsed consolidating, into a single rulemaking activity, the Station Blackout Mitigation Strategies rulemaking (NTTF Recommendations 4 and 7) with the Onsite Emergency Response Capabilities rulemaking (NTTF Recommendation 8), as well as the portions of NTTF Recommendations 9, 10, and 11 that are already being addressed as part of Order EA-12-049 implementation (NTTF Recommendation 4.2), and items currently being implemented by industry. The staff provided a proposed consolidated rulemaking package to the Commission on April 30, 2015 (ADAMS Accession No. ML15049A213). In the associated SRM, dated August 27, 2015, the Commission approved the publication of the proposed rule in the *Federal Register* for public comment, subject to changes directed by the Commission. The staff plans to publish this rule for comment in November 2015.

Currently, the Commission's approval is being sought for the staff's proposed plans to resolve the remaining NTTF EP recommendations. In SECY-15-0137, "Proposed Plans for Resolving Open Fukushima Tier 2 and 3 Recommendations," dated October 29, 2015 (ADAMS Accession No. ML15254A006), proposed that some of the remaining EP recommendations be closed, while others should be further evaluated. Currently, the staff intends to provide the Commission with resolution plans for those Tier 3 EP recommendations that require further evaluation before the end of calendar year (CY) 2016.

Licensing - Revision of NUREG-0654/FEMA-REP-1:

NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," is a joint NRC and FEMA guidance document originally issued in November 1980. Both agencies use the document to evaluate the adequacy of the emergency plans and preparedness: the NRC evaluates applicants and licensees, and FEMA evaluates State, local, and Tribal governments within the emergency planning zones (EPZs) surrounding nuclear power plants (NPPs). In 2012, the NRC and FEMA began a major effort to update NUREG-0654/FEMA-REP-1 to reflect current regulations (including the 2011 NRC EP rulemaking) and to integrate nearly 35 years of lessons learned in the EP program. The update also incorporates supplemental documents and addenda and is intended to modernize the guidance, while lessening administrative burden on users. One important aspect of the revision of NUREG-0654/FEMA-REP-1 is that it will enable better alignment between the radiological emergency preparedness (REP) programs and the Comprehensive Emergency Management Programs (CEMP) or "all-hazards" programs, which are set forth in the National Preparedness Doctrine and supported by the National Preparedness System. This will help ensure that the

NRC and licensee programs remain reflective of broader, current emergency management concepts that would be employed if there was an NPP accident with offsite consequences.

The NUREG-0654/FEMA-REP-1 revision included a very high level of stakeholder interest and engagement. The NRC held multiple public meetings and call-in sessions to engage stakeholders, including Federal partners and State, local, Tribal, and industry representatives. These sessions involved open dialogue between writing team members and stakeholder representatives to discuss concepts and ideas, as well as the draft language of the document. Numerous stakeholders provided constructive input that informed the revisions.

On May 29, 2015, the NRC and FEMA achieved a major project milestone by jointly issuing draft Revision 2 of NUREG-0654/FEMA-REP-1 (ADAMS Accession No. ML14246A519) for a 135-day public comment period. Following the comment period, the NRC, in coordination with FEMA, will review the comments received and the document will be revised as appropriate. The staff is on schedule to issue the final version of Revision 2 of NUREG-0654/FEMA-REP-1 by the end of CY 2016.

Licensing - FEMA and Stakeholder Interface:

The staff's EP and IR outreach and communications activities continue to support the NRC's organizational excellence strategy of openness. The staff demonstrated the ability to provide accurate and timely information; provide for meaningful stakeholder involvement; and enhance awareness and clearly communicate the NRC's EP and IR programs' roles, processes, and activities. Outreach and communication activities included: publication of a quarterly newsletter, use of social media, and active use of the NRC's public Web site. The staff also provides updates on NRC activities and initiatives to licensees and State and local emergency management stakeholders during various national and regional forums and conferences.

NSIR staff is working to update the Memorandum of Understanding (MOU) between the NRC and FEMA, currently contained in Appendix A to 44 CFR Part 353, which outlines the agencies' respective roles and responsibilities for radiological emergency plans and preparedness. The updates will reflect the changes in the regulations and guidance and will address REP as part of the broader Federal Comprehensive Emergency Management process. The MOU revision will also consolidate other existing MOUs between FEMA and NRC in the areas of IR and emergency assistance and support.

Oversight - Operating Experience:

EP is a cornerstone of the ROP and, accordingly, accomplishments and self-assessments for EP activities are covered in broader ROP-related documents. A sample of 2015 EP activities related to ROP-associated operating experience includes the following:

- Paragraph 50.72(b)(3)(xiii) of 10 CFR requires licensees to report a major loss of EP capabilities. The staff reviewed and endorsed Nuclear Energy Institute 13-01, "Reportable Action Levels for Loss of Emergency Preparedness Capabilities" (ADAMS Accession No. ML131560390) through NUREG-1022 (ADAMS Accession No. ML14267A447). The endorsement was publically announced on September 30, 2014

(79 FR 58811). This document was developed and issued with the objective of reducing the burden to licensees and staff from unnecessary event reports while ensuring that meaningful event reports continue to be made. The endorsed guidance has been available to the industry for 12 months, and the staff determined that the new guidance is meeting expectations.

- The NRC enhanced the regulatory requirements for evacuation time estimates (ETEs) in 2011, requiring, in part, that licensees update ETEs after every decennial census and in between decennial censuses as necessary. Guidance for the development of ETEs is provided in NUREG/CR-7002, "Criteria for Development of Evacuation Time Estimate Studies" (ADAMS Accession No. ML113010515). The staff is reviewing a few aspects related to the modeling and simulation of evacuations, which include the impact of manual traffic control, the impact of evacuations outside declared evacuation zones (shadow evacuation), and the analysis of parameters important to ETEs and trends in ETEs. This information will better inform ETE updates that licensees will submit when the next census results are available.
- The staff developed a regulatory issue summary (RIS) to address protective action recommendations (PARs) over water (ADAMS Accession No. ML15022A610). The NRC staff identified several instances where licensee emergency plans and implementing procedures did not provide for the development of PARs for the members of the public on bodies of water within the EPZ; therefore, the staff issued the RIS to remind licensees to establish and maintain PAR strategies for all areas within the plume exposure pathway EPZ, including bodies of water.

Oversight - Hostile Action-Based Exercises

New EP regulations became effective December 23, 2011 (posted in the *Federal Register* 76 FR 72560). These regulations included a requirement that by December 31, 2015, nuclear power reactor licensees are to demonstrate proficiency in key skills necessary to respond to a hostile action-based (HAB) event, as part of a Federally evaluated biennial EP exercise. After the first HAB exercise, licensees must include at least one HAB exercise scenario in each future 8-year cycle of EP exercises. All licensees and off-site response organizations are on track to complete an HAB exercise by the end of CY 2015. To date, licensees have adequately demonstrated their ability to respond to an HAB event during exercises by implementing their emergency plans effectively and coordinating onsite security, operations, emergency response personnel and offsite first responder organizations. The NRC, in coordination with FEMA, initiated a lessons-learned review based on the first round of exercises. Further, the staff understands that industry will similarly perform a lessons-learned review.

Rulemaking - Decommissioning Rulemaking and Technical Basis

In SRM to SECY-14-0118, "Request by Duke Energy Florida, Inc., for Exemptions from Certain Emergency Planning Requirements," dated December 30, 2014 (ADAMS Accession No. ML14364A111), the Commission directed the NRC staff to proceed with rulemaking on power reactor decommissioning, and set an objective of early 2019 for completion of this rulemaking. In SECY-15-0014, "Anticipated Schedule and Estimated Resources for a Power Reactor Decommissioning Rulemaking," dated January 30, 2015 (ADAMS Accession No.

ML14357A177 – nonpublic version; ML15082A089 – public version), the NRC staff committed to proceed with a rulemaking on decommissioning and provided an anticipated schedule and estimate of the resources required for the completion of this rulemaking.

The Power Reactor Decommissioning Rulemaking Working Group was formed in February 2015. The working group developed an Advance Notice of Proposed Rulemaking (ANPR), which is expected to be issued in early November 2015. A public meeting is expected to be held in December 2015 with the objective of explaining the content of the ANPR to assist stakeholders in submitting informed responses. The proposed rulemaking is scheduled for delivery to the Commission in 2018.

Event Response - NRC Incident Response Program and Exercises

The staff planned and participated in 3 evaluated reactor licensee emergency exercises during FY15 from the Headquarters Operations Center (HOC); and the regional offices participated in 21 reactor exercises. The HOC and regional offices participated in HAB exercises for the Sequoyah Nuclear Power Plant and the Ft. Calhoun Station Nuclear Power Plant. The HOC and Region II participated in the SE-15 whole-community response and recovery exercise hosted by the H.B. Robinson Nuclear Power Plant and State of South Carolina. SE-15 is discussed further, below.

In addition, the staff coordinated to plan and participate in an exercise with a fuel cycle facility (URENCO USA). This was the first time that the licensee and the State of New Mexico conducted an exercise with the NRC. Also, in FY15, NSIR and the Office of Nuclear Materials Safety and Safeguards (NMSS) staff conducted a materials licensee tabletop exercise, “2015 Materials Incident Response Tabletop Exercise” (ADAMS Accession No. ML15155B194), to explore and integrate several agency processes for materials event response, including those that do not rise to the level of staffing the HOC or a regional incident response center. The tabletop exercise identified no major gaps in the NRC internal processes when responding to materials incidents. It did, however, illustrate areas where additional evaluations of the NRC guidance should be enhanced or supplemented.

In SECY-15-0049, “Status of Fukushima Incident Response Corrective Actions,” dated March 30, 2015 (ADAMS Accession No. ML14329B297), the staff provided the status of the actions that resulted from the NRC internal Fukushima after action report (ADAMS Accession No. ML112580203). Staff provided progress on the overarching categories identified in the after action report, as well as a detailed list of improvement actions with a status for each.

Event Response - SE-15 Exercise

On July 21-23, 2015, staff participated with the State of South Carolina, Duke Energy’s H.B. Robinson Nuclear Plant, FEMA, the U.S. Department of Energy, and approximately 20 other Federal agencies, State agencies, and private sector organizations in SE-15. The exercise examined the Nation’s ability to respond to and recover from an NPP emergency, which includes widespread contamination beyond the site boundary.

The exercise was unique in the magnitude of Federal agency involvement and tested the Federal Government’s ability to establish and maintain unified command and coordination in accordance with the National Response Framework (NRF) and National Disaster Recovery

Framework (NDRF). The exercise allowed the NRC and the licensee to gain a better understanding of the roles and expectations of other Federal agencies during an NPP accident based on physical participation, rather than simulated discussions. Planning for this exercise started in 2012, and improvements have already been implemented for many of the lessons learned and coordination issues that were identified.

In September 2015, South Carolina hosted a 2-day tabletop exercise which was focused on the recovery activities 6 months and 18 months after the simulated radiological release. This tabletop exercise tested the Federal and local governments' abilities to coordinate and integrate response and recovery activities for the economic and housing core capabilities. The NRC actions related to this phase of the accident involved Price-Anderson Act responsibilities and the process by which the NRC would organize and staff a recovery organization. This was the first exercise of the NDRF as it might apply to a nuclear accident, as well as one of the first exercises to evaluate the recent National Recovery Doctrine for any hazard.

Event Response – Protective Action Guides Update Efforts

The updated U.S. Environmental Protection Agency (EPA) Protective Action Guides (PAGs) manual provides recommended numerical PAGs for the principal protective actions available to responsible officials during a radiological incident. A PAG is a specific protective action guideline designed to help reduce or avoid the projected dose to an individual from a release of radioactive material. The current PAG manual was published in 1992 and the NRC staff is participating in an effort by the Federal Radiological Preparedness Coordinating Committee (FRPCC) to update the document. A draft document for interim use was published in 2013 and included updated dosimetry, changes to the intermediate and late phase PAGs (i.e., removed the intermediate phase relocation PAG of 5 rem over 50 years and maintained the relocation PAG of 2 rem the first year and not to exceed 500 millirem in any subsequent year), and guidance on optimization for recovery. Although the EPA did not include drinking water PAGs in this draft, they requested input on the appropriateness of such PAGs. As a result of the comments received, the EPA developed a plan for water PAGs that are consistent with the Food and Drug Administration food PAGs (500 millirem/yr). The draft PAGs were used in the SE-15 exercise and the final PAG guidance is expected to be published in 2016.

Event Response - Nuclear Radiological Incident Annex (NRIA) Update Efforts

NRC staff is participating in an FRPCC-led interagency effort to revise the NRIA. This annex to the Response and Recovery Federal Interagency Operational Plans under the NRF and NDRF will reflect existing authorities' roles and responsibilities for nuclear and radiological incidents (including, but not limited to, NRC regulated activities). In addition, the revision will update the document to reflect new response and recovery concepts from the revised NRF and NDRF, including CEMP and all-hazards approaches, as well as incorporate lessons learned from Fukushima, other events, and SE-15. In 2015, the annex was provided to interagency partners and States for comment, and the draft NRIA document was used for SE-15 and a Department of Defense exercise.

This effort supports building a more robust national communication with the 'whole community' of responders. In addition, the NRC's participation helps to maintain cooperative intergovernmental relationships to ensure the NRC roles and responsibilities are considered and reflected in national resiliency capabilities.

Event Response - Continuity of Operations (COOP) Program

The NRC staff continues to enhance the operational aspects of COOP. During FY15, the staff successfully completed the annual update to the NRC COOP plan and procedures based on lessons learned during the biennial, externally-evaluated, full-scale exercise, Eagle Horizon 2014. The lessons learned included enhancements to the operational aspects of the program, including updates to the NRC's reconstitution plan and enhanced checklists to ensure rapid and effective decision-making during a potential emergency at NRC headquarters facilities. In addition, the staff successfully planned, coordinated, and conducted Eagle Horizon 2015, which was a no-notice, internally evaluated tabletop exercise on April 20-21, 2015.

International Activities – EP and IR Interface Accomplishments

In 2015 the staff maintained its relationships with key international partners on both a bilateral basis and multilateral basis, conducting multiple meetings and hosting a foreign assignee in the EP area. Highlights of staff's international interface accomplishments include:

- Staff coordinated with multiple parts of the U.S. Government to support an interagency program to host international observers for SE-15. Over 60 international visitors from 12 countries, the International Atomic Energy Agency, and the Organization for Economic Co-operation and Development/Nuclear Energy Agency, observed the exercise and were able to interface with the NRC and other participants.
- In April 2015, the NSIR's Director for the Division of Preparedness and Response served as Chairman of the 9th International Experts Meeting (IEM) on Assessment and Prognosis in Response to a Nuclear or Radiological Emergency at the International Atomic Energy Agency (IAEA). The IEM was organized under the IAEA action plan on nuclear safety related to Fukushima. The IEM discussed issues, challenges, and solutions related to the assessment and prognosis process in response to a nuclear or radiological emergency. The IEM was attended by over 200 participants from 64 Member States and 4 international organizations, and they provided a wide range of expertise and diverse viewpoints on assessment and prognosis issues. A particular focus of the IEM is the post-Fukushima role of IAEA in assessment and prognosis during nuclear or radiological emergencies.
- In February 2015, the NRC registered its incident response capabilities with the IAEA Response and Assistance Network, which is a compilation of technical and corporate capabilities that are used for incident response international assistance. The NRC's registered capabilities relate to technical expertise for pressurized water reactors, boiling water reactors, and fuel cycle facilities.

Self-Assessment:

The NRC's EP and IR programs and activities continue to align with the agency's strategic security and safety goals. In the interests of continuous improvement, the NRC's FY15 EP and IR programs' performance is assessed using the following four performance measures:

- (1) Ensure the NRC emergency response capabilities for safety or security events at licensed facilities by maintaining the readiness of the HOC and response organizations.
- (2) Successfully plan and conduct all aspects of NRC participation in SE-15.
- (3) Ensure safety and security considerations are appropriately integrated and reflected in EP regulatory activities related to decommissioning.
- (4) Maintain a stable and predictable EP regulatory program for licensing, oversight and regulatory infrastructure.

Performance measures 1 and 2 are associated with the event response, and training product lines. Successful demonstration of performance measure 1 is reflected in the staff maintaining response team qualifications and HOC response availability, annual participation in exercises that involve a wide array of Federal, State and local authorities, and overall maintenance of cooperative intergovernmental relationships to ensure NRC roles and responsibilities are considered in national resilience programs. Activities that demonstrate successful implementation of performance measure 1 include: maintaining a 99-percent rate of NRC qualified responders for the various IR teams; interagency coordination on the development of the NRA; and participating in the Eagle Horizon 2015 COOP exercise. Successful demonstration of performance measure 2 is reflected in the coordination and table top exercises in preparation for SE-15. Headquarters and Region II staff participated in a tabletop exercise with Duke Energy, the State of South Carolina, local response organizations, and other Federal agencies to discuss initial actions taken by each entity in response to a notification of an event at a nuclear plant. The tabletop was very informative for the participants and assisted in refinement of response procedures. As a final point, the SE-15 exercise was unique and allowed the NRC and the licensee to gain a better understanding of the roles and expectations of other Federal agencies during an NPP accident based on physical participation, rather than simulated discussions. The SE-15 exercise provided the first opportunity to explore and demonstrate newly created or updated national policies and procedures that will be applicable during a nuclear plant event.

Performance measures 3 and 4 are associated with the licensing and rulemaking product lines. Successful demonstration of both performance measures are reflected in the staff's ability to complete technical evaluations of EP submittals for fuel cycle facilities, operating reactors, and new reactors; and technical review of licensee EP exemption requests and LARs associated with existing emergency plans and EAL scheme changes for permanently defueled decommissioning sites. Additionally, successful performance is reflected in recent rulemaking activities such as developing the ANPR for decommissioning facilities and developing the technical basis for small modular reactors addressed in SRM SECY-15-0077. The staff maintains engagement with stakeholders by keeping an open dialogue and integrating stakeholder concepts, and language into guidance documents such as NUREG-0654/FEMA-REP-1. The EP manual was developed to provide amplifying guidance for NUREG-0654 evaluation criteria and consolidate EP guidance from other documents. Additionally, although industry questioned the extent of this guidance, the staff continues to remain committed to working closely with industry on the appropriate implementation of Revision 2 of NUREG-0654/FEMA-REP-1.

Overall, the staff demonstrated successful implementation of the performance measures by coordinating and executing many activities performed within the EP and IR programs. This was substantiated by the Office of the Inspector General (OIG). OIG conducted an audit to assess the NRC's (1) coordination with external stakeholders to support implementation of new EP requirements codified by recent changes to 10 CFR Parts 50 and 52; and (2) plans for managing issues that may hinder implementation of the new requirements. OIG found that the NRC conducted appropriate outreach with external stakeholders throughout the agency's 2011 EP rulemaking process, and OIG identified no current issues with and offered no recommendations regarding implementation of the new requirements.

CONCLUSION:

This paper highlights accomplishments of the NRC's EP and IR programs during FY15, and illustrates how these accomplishments have supported the NRC's mission and strategic plan. The programs and activities performed by the staff have improved by incorporating lessons learned through operating experience, EP exercises, and stakeholder engagement. Further, the staff continues to demonstrate an ability to develop and implement a stable and predictable EP regulatory program for licensing, oversight and regulatory infrastructure.

COORDINATION:

The Office of the General Counsel reviewed this paper and has no legal objection.

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