

Industry Perspectives on Proposed EP Handbook

Peter Polfleit – NextEra Energy

Sue Perkins-Grew - NEI

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Purpose of Proposed EP Handbook

- The evaluation criteria address overall emergency preparedness program and preparedness capabilities. The level of detail that should be provided in emergency plans to describe these capabilities, and allow NRC/FEMA staff to determine whether the evaluation criteria are met, is further amplified in the NRC EP Handbook (NUREG-[TBD]) and the FEMA REP Program Manual. Additional information regarding various means by which evaluation criteria may be addressed, such as examples of acceptable methods, is also provided in NUREG-[TBD] and the FEMA REP Program Manual. *(Page 4 of NUREG-0654/FEMA-REP-1)*

Industry Concerns with EP Handbook

- NEI Letters to NRC
 - Pollock to Holian, *Emergency Preparedness Handbook: Amplifying Guidance for the Evaluation Criteria in NUREG-0654/FEMA-REP-1*, dated June 15, 2015
 - Butler to Brown, *Industry Recommendations for NRC Project AIM 2020 Prioritization and Re-baselining Initiatives*, dated September 15, 2015
 - Pollock to Johnson, *Industry Priorities for Emergency Preparedness Programs*, dated October 7, 2015

Industry Concerns with EP Handbook

- Appears to impose new requirements
- Overly prescriptive – too much focus on how something should be done, instead of what needs to be done and performance standards
- Would drive unnecessary detail in E-Plans
- Inhibits innovation and improvements
- Contains some guidance and content that belongs in other documents

Other Concerns with EP Handbook

- Commenting would involve significant time and resources (both industry and NRC staff)
- Difficulty in identifying EP Handbook comments without knowing how comments on NUREG-0654 NUREG-0654/FEMA-REP-1, Revision 2 will be adjudicated
- Detracts from higher value work

Vehicle for Regulatory Guidance

- “The NRC issues regulatory guides to describe and make available to the public methods that the NRC staff considers acceptable for use in implementing specific parts of the agency’s regulations, techniques that the staff uses in evaluating specific problems or postulated accidents, and data that the staff needs in reviewing applications for permits and licenses.”
 - The EP Handbook would appear to be a Reg Guide

Alternatives to Consider

- Determine what – if any - additional guidance is needed to support implementation of NUREG-0654, Revision 2
 - Establish objectives (e.g. knowledge management; memorializing FAQs, etc.)
 - What type of document is appropriate (e.g. NEI Guidance Document)
 - Timeline for development given limited resources
- NEI and industry could develop with staff engagement and then submit for endorsement

Alternatives to Consider, cont'd

- A guidance document for *Development of an Emergency Plan using NUREG-0654, Revision 2* could:
 - Use approach similar to NEI 99-01
 - Contain standard sections with bases and developer notes
 - Include appropriate content from EP Handbook