

November 17, 2015

MEMORANDUM TO: Kevin Coyne, Deputy Director
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

FROM: Robert E. Kahler, Chief **/RA/**
Inspection and Regulatory Improvements Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

SUBJECT: SUMMARY OF PUBLIC MEETING BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION, THE NUCLEAR ENERGY INSTITUTE, AND INDUSTRY TO DISCUSS THE PROPOSED EP HANDBOOK "AMPLIFYING GUIDANCE FOR THE EVALUATION CRITERIA IN NUREG-0654/FEMA-REP-1, 'CRITERIA FOR PREPARATION AND EVALUATION OF RADIOLOGICAL EMERGENCY RESPONSE PLANS AND PREPAREDNESS IN SUPPORT OF NUCLEAR POWER PLANTS'", REVISION 2

The purpose of this Category 2 Public Meeting between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of the Nuclear Energy Institute (NEI) and industry, held on November 3, 2015, was to discuss the draft "Emergency Preparedness (EP) Handbook: Amplifying Guidance for the Evaluation Criteria in NUREG-0654/FEMA-REP-1, 'Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants,'" Revision 2 (i.e., EP Handbook) (Agencywide Documents Access and Management System (ADAMS) accession number ML15140A415).

The NRC posted a notice in the *Federal Register* (FR) on May 29, 2015, (80 FR 30739) that published proposed Revision 2 to NUREG-0654/FEMA-REP-1. The notice also included information regarding the availability of the draft NRC EP Handbook, which would provide amplifying guidance for the evaluation criteria in Section II of draft NUREG-0654/FEMA-REP-1, Revision 2. The intent of this meeting was to discuss the background and development of the EP Handbook as well as potential alternatives for providing additional guidance regarding the content of nuclear power plant (NPP) emergency plans (E-Plans).

Following introductory/opening remarks by the NRC and NEI, Brian McDermott, Deputy Office Director, Office of Nuclear Security and Incident Response (NSIR), stated that the NRC will table the development of the EP Handbook for now and re-evaluate the intended path forward at a later date after the completion and issuance of NUREG-0654/FEMA-REP-1, Revision 2.

The staff then provided an overview of the background and development of the draft EP Handbook. This overview included the purpose, structure, intended usage, content, and development timeframe of the Handbook which began in September, 2013. At that time the EP Handbook was announced as a key part of consolidating EP guidance into 3 main documents (i.e., NUREG-0654, Rev. 2; new NRC EP Handbook; and the Radiological Emergency Preparedness [REP] Program Manual). The staff explained that the EP Handbook is intended to assist the staff in the review of changes to currently approved licensee E-Plans for NPPs and the review of new NPP E-Plans submitted for approval by license applicants, and does not introduce any new requirements.

NEI representatives then made a presentation titled "Industry Perspectives on Proposed EP Handbook" (ADAMS accession number ML15287A144). They stated that NEI has written three formal letters to NRC pointing out concerns with the Handbook (dated June 15, September 15, October 7, 2015). They presented industry concerns with the Handbook including:

- Licensee E-Plans are robust, approved by NRC, and function well. Additional guidance on guidance (i.e., EP Handbook) is not necessary.
- It is overly prescriptive and appears to impose new requirements.
- Commenting on the Handbook would involve significant time and resources, detracting from higher value work.
- It is duplicative of other guidance, will increase administrative burden, and will not improve efficiency.

NEI representatives felt that EP Handbook development should be tabled and the concept of additional EP guidance be re-evaluated through further NEI/NRC dialogue to determine the most appropriate type of document to develop. They also stated that they desire more discussion on what the NRC is attempting to achieve with the Handbook.

In closing, Mr. McDermott thanked NEI and representatives participating by phone for their interest in this topic. He summarized the key points of the meeting as follows: 1) The industry does not think it needs new "guidance on guidance" for E-Plan development; 2) Documents with a focused purpose are more useful to industry; and 3) The NRC will re-evaluate the path forward for the EP Handbook at a later date in discussion with the industry.

Members of the public were provided an opportunity to provide comments. There were no comments from members of the public.

Enclosure:
Meeting Attendees

CONTACT: Jeff Laughlin, NSIR/DPR
(301) 287-9229

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Distribution:

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DATE	11/12/15	11/17/15	11/17/15

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Meeting Attendees

**PUBLIC MEETING TO DISCUSS THE PROPOSED EP HANDBOOK
 “AMPLIFYING GUIDANCE FOR THE EVALUATION CRITERIA IN NUREG-
 0654/FEMA-REP-1, ‘CRITERIA FOR PREPARATION AND EVALUATION OF
 RADIOLOGICAL EMERGENCY RESPONSE PLANS AND PREPAREDNESS
 IN SUPPORT OF NUCLEAR POWER PLANTS’”, REVISION 2**

Tuesday, November 3, 2015 (1300 – 1500)

NAME	ORGANIZATION	EMAIL
Jana Bergman	CURTISS-WRIGHT Nuclear	J.Bergman@curtisswright.com
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Joseph Anderson	NRC	
Robert Lewis	NRC	
Brian McDermott	NRC	
Bob Kahler	NRC	
Don Tailor	NRC	
Bruce Musico	NRC/NSIR	

The following individuals representing the industry called into the meeting:

1. Vince Cwietniewicz (Exelon)
2. Steven Gangi (Enercon)
3. Rae Walker (DSHS)
4. Greg Richardson (Engineering Planning & Management)
5. David S. Burgin (PSEG)
6. Megean Brown (Talen Energy)
7. John Callahan (Xcel Energy)
8. Troy Burnett (Entergy)
9. Toni Pilo (Duke Energy)
10. John Standridge (Entergy Corporate)
11. Monica Ray (NEI)

Members of the public called into the meeting, but did not provide their names.

Enclosure