Rulemaking1CEm Resource

From:	RulemakingComments Resource
Sent:	Monday, March 21, 2016 6:03 PM
To:	Rulemaking1CEm Resource
Subject:	Comment on ANPR-26, 50, 52, 73, and 140 - Regulatory Improvements for Decommissioning
Attachments:	NRC-2015-0070-DRAFT-0084.pdf

DOCKETED BY USNRC—OFFICE OF THE SECRETARY

SECY-067
PR#: ANPR-26, 50, 52, 73, and 140
FRN#: 80FR72358
NRC DOCKET#: NRC-2015-0070
SECY DOCKET DATE: 3/17/16
TITLE: Regulatory Improvements for Decommissioning Power Reactors
COMMENT#: 089

PUBLIC SUBMISSION

As of: 3/17/16 4:08 PM
Received: March 17, 2016
Status: Pending_Post
Tracking No. 1k0-8ojv-u9li
Comments Due: March 18, 2016
Submission Type: Web

Docket: NRC-2015-0070
Regulatory Improvements for Power Reactors Transitioning to Decommissioning

Comment On: NRC-2015-0070-0007
Regulatory Improvements for Decommissioning Power Reactors; Extension of Comment Period

Document: NRC-2015-0070-DRAFT-0084
Comment on FR Doc # 2015-32599

Submitter Information

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Organization: REP
Government Agency Type: Federal
Government Agency: FEMA

General Comment

See attached file(s)

Attachments

FEMA Comment on 2015-0070 ANPRM

FEMA's Radiological Emergency Preparedness Program has been developed with the goal of planning and preparing for a single risk: commercial nuclear power plants incidents. It is in support of this goal that FEMA's Technological Hazards Division provides oversight and guidance to offsite jurisdictions in their emergency preparedness responsibilities.

For over 35 years, the partnership between FEMA and NRC has resulted in State, local, tribal, and industry stakeholders teaming in a collaborative and coordinated manner to provide for the safety and security of the general public. Both agencies provide regulations, guidance, and policy that direct the planning, training, and exercising activities of the participants in this program.

The historic partnership between our agencies is built upon a memorandum of understanding that describes how FEMA provides findings on the adequacy of offsite emergency preparedness to the NRC, which is often referred to as reasonable assurance. In determining reasonable assurance that the health and safety of offsite communities will be maintained during and after an emergency, FEMA, along with its State, local, and tribal stakeholders, employs a variety of methods. These methods can include biennial exercises, staff assistance visits, and annual letters of certification from the State. NRC subsequently uses FEMA's determination to verify and maintain the emergency preparedness conditions under which the facility's license was issued.

The decommissioning of a power plant intrinsically affects the risk profile of a jurisdiction and, as such, will impact both offsite and onsite emergency preparedness programs. As a facility undergoes decommissioning, both FEMA and the NRC expect that surrounding jurisdictions will respond to the changing risk conditions with appropriate adjustments to their plans, capabilities, and resources.

In order to maintain the safety and security of a community, offsite jurisdictions must be able to comprehensively analyze and understand the threats and associated risks they face. The Threat and Hazard Identification and Risk Assessment – or THIRA-- process provides one methodology for examining communities' threats and hazards of greatest concern, as well as for identifying the capabilities required to address those risks. The THIRA process helps communities map their risks to the thirty-one core capabilities listed in the National Preparedness Goal, enabling them to make informed decisions on desired outcomes, capability targets, and required resources. Using the THIRA process, State, urban areas, and tribal jurisdictions can include representatives and perspectives from their whole community partners. Completing any such threat identification and risk assessment process assists offsite jurisdictions in informing and updating their emergency preparedness programs. We will continue to support offsite organizations as they adjust their plans, capabilities, and resources to the changing radiological threat.

Let it also not be forgotten that when decommissioning last occurred in the 1990s, the events of September 11th, 2001 had not yet occurred. In the years since, we have seen an evolution in the fundamental approach to emergency preparedness. More so now, than at any other time in the past, we must consider and account for the entire spectrum of threats - technological, natural, and terrorist-based -- even in the context of decommissioning.

It is with a foundation in the mandate given to FEMA 35 years ago, the principles of the National Preparedness System, and the partnership between FEMA and the NRC, that FEMA is advocating for continued coordination from the NRC throughout any decommissioning process. FEMA anticipates that further discussions will lead to the development of formalized and comprehensive joint decommissioning guidance.

Again, we strongly encourage NRC and its licensees to work with State, local, and tribal communities in their determinations of risk, threat, and public safety. Continued and synchronized engagement among all parties throughout any decommissioning process can only be seen as a logical extension of existing partnerships – and is a necessary extension to provide for the health and safety of all citizens.