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2016 APR 12 AM 10:46

PUBLIC SUBMISSION

As of: 4/12/16 10:46 AM
Received: April 11, 2016
Status: Pending Post
Tracking No. 1k0-8p0e-6py0
Comments Due: April 14, 2016
Submission Type: Web

RECEIVED

Docket: NRC-2016-0054

License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation

Comment On: NRC-2016-0054-0001

License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation;
Draft Regulatory Issue Summary for Comment

Document: NRC-2016-0054-DRAFT-0002

Comment on FR Doc # 2016-05813

(P)

Submitter Information

3/15/2016

81FR 13849

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General Comment

Please see nuclear industry comments in attached pdf file, "Industry Comments on NRC Draft Regulatory Issue Summary 201X-XX, License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation."

Attachments

Industry Comments on DRAFT ERO Staffing LAR RIS - Final Submitted

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM-03

Add= F. Keene (STK I)

Regulations.gov Docket ID: NRC-2016-0054
Industry Comments on NRC Draft Regulatory Issue Summary 201X-XX
License Amendment Requests for Changes to Emergency
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Comment #	Location	Comment
1	Page 4, first paragraph under "Summary of Issue," third sentence	At ". . . on how NEI-10-05 and the associated . . ." - delete the hyphen after NEI. Should read "NEI 10-05."
2	Page 5, first paragraph under "Notification and Communication," second sentence	<p>"For example, the 30-minute responder may be eliminated if an extra on-shift position is identified to fill this role."</p> <p>The paragraph already states that, "These on-shift positions should not be assigned other tasks that may prevent the timely performance of their assigned notification or communication functions as specified in the emergency plan." This is the operative requirement from 10 CFR 50, Appendix E, Section IV.A.9; therefore, recommend deleting the unnecessary and potentially confusing term, "extra."</p> <p>This comment also applies to the fourth sentence of the same paragraph.</p>
3	Page 6, first paragraph under "Off-site Dose Assessment," first sentence	<p>"To adequately support the proposed extension of the one 30-minute responder, licensees should identify an extra on-shift position as capable of initially filling the 30-minute responder's role of 'off-site dose assessment.'"</p> <p>The paragraph already states that, "NRC staff will review whether this position is assigned other tasks that may prevent the timely performance of its assigned off-site dose assessment functions as specified in the emergency plan." This is the operative requirement from 10 CFR 50, Appendix E, Section IV.A.9; therefore, recommend deleting the unnecessary and potentially confusing term, "extra."</p>
4	Page 6, first paragraph under "Off-site Surveys / On-site (out-of-plant) / In-Plant Surveys," last sentence.	To improve clarity, suggest rewording this sentence to read, "Additionally, the change basis should describe supportive features that promote timely and effective performance of off-site dose projections (e.g., an automated computer program), and reliance upon installed and calibrated plant effluent monitors that would be available under accident conditions."
5	Page 7, first paragraph under "Technical Support," fourth sentence	To improve clarity, suggest rewording this sentence to read, "The licensee should also show that augmenting staff with core/thermal hydraulics expertise will be available within an appropriate time frame."

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6	Page 9, first paragraph under "Chemistry/Radio-chemistry," second sentence	To improve clarity, suggest rewording this sentence to read, "To adequately support an extension of this responder beyond 60 minutes, the licensee should demonstrate that no chemistry-related task is required to be performed within 90 minutes of an emergency declaration (i.e., a task that is necessary for implementation of emergency operating procedures or operation of safety-related equipment), or that all such tasks can be performed by the on-shift chemistry technician with no collateral duty concerns."
7	Page 10, first paragraph under "Technical Support"	To improve clarity, suggest rewording this paragraph to read, "Per the guidance of NUREG-0654 Table B-1, "Electrical" and "Mechanical" expertise should be provided by two 60-minute responders under the "Technical Support" major task. To adequately justify an extension of these responders, the licensee should show that on-shift positions are capable of filling these roles during the 90-minute period after an emergency declaration. This will require a review of site procedures to identify the technical support tasks requiring electrical and mechanical expertise that must be performed within the first 90 minutes of an emergency. The licensee should then show that there are on-shift positions with the necessary expertise to perform the identified technical support functions, and that such performance will not prevent the timely performance of their other assigned functions as specified in the emergency plan. The justification should identify procedure, training and information technology advances made since the implementation of NUREG-0654 that facilitate technical support assessments by on-shift personnel or obviate the need for such assessments within 90 minutes of an emergency declaration. Additionally, the change justification should address the ability of on-shift positions to perform troubleshooting activities without interfering with their primary emergency response duties (e.g., on-shift electrical or mechanical maintenance personnel with supervisory personnel to provide oversight)."

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8	<p>Page 6 – “Off-site Surveys / On-site (out-of-plant) / In-Plant Surveys”</p> <p>Pages 7 & 8 – “Radiation Protection”</p>	<p>These two sections state,</p> <p>On Page 6 – “To adequately support an extension in the response time for the two 30-minute responders for on-site (out-of-plant) and in-plant surveys to 60 minutes, the licensee should show that the on-shift HP staffing includes one HP technician per unit for a multi-unit site or a minimum of two HP technicians on shift for a single unit site.”</p> <p>On Pages 7 & 8 – “To adequately support an extension in response timing of the two radiation protection 30-minute responders, the licensee should show that the on-shift HP staffing includes one HP technician per unit for a multi-unit site or a minimum of two HP technicians for a single unit site on shift.”</p> <p>For clarity, text should be added to one or both locations to indicate that these references are to the same HP technicians and are not additive (i.e., the expectation is not for a total of 2 HP technicians per unit for a multi-unit site or 4 HP technicians for a single unit site).</p>
9	<p>Page 9 – “Off-site Surveys / On-site (out-of-plant) / In-Plant Surveys”</p> <p>Page 10 – “Radiation Protection”</p>	<p>These two sections state,</p> <p>On Page 9 – “To adequately support an extension of these responders to 90 minutes, the licensee should show that the on-shift HP staffing includes a minimum of four HP technicians.”</p> <p>On Page 10 – “To adequately support an extension in response timing of the two radiation protection 60-minute responders to 90 minutes, the licensee should show that the on-shift HP staffing includes as a minimum, four HP technicians.”</p> <p>For clarity, text should be added to one or both locations to indicate that these references are to the same HP technicians and are not additive (i.e., the expectation is not for a total of 8 HP technicians). Also, both examples should make clear that these 4 HP technicians encompass, and are not in addition to, the 2 HP technicians discussed in the 30-minute to 60-minute section (i.e., the expectation is not for a total of 6 HP technicians).</p>

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10	N/A	<p>This RIS should make clear that the functions/tasks associated with the implementation of mitigating strategies for Beyond Design Basis (BDB) events, those required by NRC Orders EA-12-049 and EA-12-051, and addressed by guidance in NEI 12-01 and 12-06, should not be considered in ERO staffing change assessments unless such functions/task are described in the site emergency plan. The site staffing assessment performed to respond to NRC letter, <i>Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident</i>, dated March 12, 2012, demonstrates the availability of sufficient staff to implement the emergency plan concurrently with BDB event response strategies and guidelines (i.e., those required to maintain or restore the functions of core cooling, containment, and spent fuel pool cooling). Performance and maintenance of this BDB event response staffing assessment are addressed in the new requirements of the proposed Mitigation of Beyond Design Basis Events (MBDBE) Rule (80 FR 70609).</p>