

**SUSAN PERKINS-GREW**

*Senior Director,  
Nuclear Security and Incident Preparedness*

1201 F Street, NW, Suite 1100  
Washington, DC 20004  
P: 202.739.8016  
spg@nei.org  
nei.org



June 19, 2017

Mr. Joseph Anderson  
Chief, Reactor Licensing Branch  
Division of Preparedness and Response  
Office of Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Industry Comments on EPFAQ 2017-001

**Project Number:** 689

Dear Mr. Anderson:

The industry's comments on draft EPFAQ 2017-001 are shown below and in the attached document.

1. We suggest including references to Initiating Condition (IC) AA1 from NEI 99-01, Revision 6, in the discussion of Emergency Action Level (EAL) changes. Similar to ICs AS1 and AG1, IC AA1 has EALs based on a multiple of the EPA PAGs – in this case, 1% of the PAG value. Since many sites have implemented NEI 99-01, Revision 6, the EPFAQ should address IC AA1 as well. Following the staff's approach for depicting changes to ICs AS1 and AG1, we've included a suggested "Markup-Draft" of IC AA1 showing the acceptable changes (which involve removal of the 50 mrem thyroid CDE thresholds).
2. We are proposing a new basis statement and related developer note for IC AA1; the added text is highlighted in yellow in the attachment. The statement and note would help licensees maintain consistency with NRC guidance and current licensing bases related to Radiological Environmental Monitoring Programs. Specifically, the proposed additions clarify that liquid releases should continue to be monitored and assessed under applicable RETS/ODCM requirements (i.e., EPA PAG and ICRP 60 dose assessment assumptions and methodologies should not be used).
3. With respect to the discussion on endorsed EAL guidance, the staff should consider adding a statement indicating that the emergency classification scheme for Virgil C Summer Nuclear Station, Units 2 and 3, is endorsed as described in NRC letter, Williams to Jones, dated April 10, 2017. Likewise, the emergency classification scheme for Vogtle Electric Generating Plant, Units 3 and 4, is

endorsed by NRC letter, Williams to Whitley, dated May 18, 2017.

4. The staff's "Markup-Draft" of AS1 and AG1 both state,

The EPA PAGs are expressed in terms of the sum of the effective dose equivalent (EDE) ~~and the committed effective dose equivalent (CEDE), or as the thyroid committed dose equivalent (CDE)~~. For the purpose of these IC/EALs, the dose quantity total effective dose equivalent (TEDE), as defined in 10 CFR Part 20, is used in lieu of "...sum of EDE and CEDE [committed effective dose equivalent]...."

Note that the reference to CEDE is deleted in the first sentence but retained in the second. It would appear that the deletion of CEDE in the first sentence was an error and, therefore, the paragraph should read,

The EPA PAGs are expressed in terms of the sum of the effective dose equivalent (EDE) and the committed effective dose equivalent (CEDE), ~~or as the thyroid committed dose equivalent (CDE)~~. For the purpose of these IC/EALs, the dose quantity total effective dose equivalent (TEDE), as defined in 10 CFR Part 20, is used in lieu of "...sum of EDE and CEDE [committed effective dose equivalent]...."

This comment also applies IC AA1; we have shown the corrected version of the above paragraph in our "Markup-Draft" of IC AA1.

Questions regarding these comments should be directed to Mr. David Young (202-739-8127 or [dly@nei.org](mailto:dly@nei.org)).

Sincerely,



Susan Perkins-Grew

Attachment

c: Mr. Ray Hoffman, NSIR/DPR/RLB/ORLT, NRC  
Mr. Don Johnson, NSIR/DPR/RLB/ORLT, NRC  
Ms. Patricia Milligan, NSIR/DPR, NRC  
NRC Document Control Desk