

Post-Disaster (Severe Weather) Assessments - NRC / FEMA Roles and Responsibilities

Regulations

Regulation	Description	Delta
10 CFR 50.54 (2)(ii)	Based upon a review of the FEMA findings and determination, if the NRC determines that the state of emergency does not provide reasonable assurance that adequate protective measure can and will be taken in the event of a radiological emergency... four months is given to correct the finding.	The regulation does not address post-disasters and actions directed out of NRC IM 1601.
44 CFR 353, App. A III.I.	The regulation provides the structure and responsibilities of post-disaster actions. FEMA will determine the need for and, if necessary, conduct a Disaster-Initiated Review (DIR). The NRC will consider information and pertinent findings from the Disaster-Initiated Review in making decisions regarding the restart or continued operation of the affected operating NPP.	

Disaster Review Process

Action	Source	NRC / FEMA Responsibilities	Utility Actions	Delta / Comments
Pre-Disaster				
NRC Regional State Liaison Officers (RSLOs) a. For a potential natural disaster where there will be an advance notice (e.g., hurricane), consider having pre-planning meetings or conference calls with the FEMA Region and affected State and local response organizations, as warranted, to discuss post-event disaster review coordination and identification of potential compensatory measures.	NRC Inspection Manual 1601	NRC Regional State Liaison Officer	Support and ensure pre-disaster activities are adequate for timely and efficient post disaster evaluations.	FEMA is responsible for the offsite post disaster review and therefore should be coordinating the pre-disaster activities. Recommend placing step in Standard Operating Guide (SOG)
Post Disaster				
<u>Immediately</u> following an incident, a Preliminary Capability Assessment (PCA) should be performed to <u>obtain prompt assessment (snapshot)</u> of offsite EP and assist in FEMA determining the need and timing for a Disaster Initiated Review (DIR). PCA led by FEMA Regional Assistance Committee (RAC) Chair w/coordination from regional NRC. 11 Questions to assess the ability to coordinate response operation, as appropriate compensatory measures should be developed and implemented. PCA is performed regardless of NPP operational status.	SOG NRC/FEMA MOU IM 1601	FEMA I RAC Chair – coordinate PCA and determine need to DIR NRC Regional State Liaison Officer – - Agencies primary point of contact with FEMA, - Interface with licensee and NRC Regional staff on status of NPP with regards to plant start-up and on-site EP readiness	Support OROs and FEMA in evaluation activities (provide drivers, assist in creating reports, etc.). Coordinate with the State EOC to ensure Post Disaster priorities are adequate to obtain resources (FEMA, State, etc.) to conduct the PCA (and if necessary DIR) and determine “Reasonable Assurance” is satisfied. Priority restoration of the NPP operations should be based upon the current or anticipated need to support the electrical grid restoration. Communicate to the NRC the anticipated time the NPP will be required to support the electrical grid.	If evaluators are stationed properly and are briefed on scope of evaluation , the PCA should provide the <u>prompt assessment</u> to determine if a DIR is required. The FEMA and NRC documents are silent on multi-unit sites where one may have shut-down and the other(s) remain in operation.

Action	Source	NRC / FEMA Responsibilities	Utility Actions	Delta / Comments
<p>If it is determined that a DIR is NOT required, the NRC will make a determination on the suitability of ORO's emergency plans and may allow the NPP to restore operations (based upon offsite EP, other operational/technical issues specific to the NPP may require shutdown).</p>		<p>The FEMA Technical Hazards D Director (HQ), NRC Regional Administrator, FEMA RAC Chair, and REP Program Branch Chief will decide if a DIR is required. The FEMA Technical Hazards Director communicates in writing the need/no need to conduct a DIR to the NRC Director, NSIR. Communication may be oral if an urgent need exists.</p>		
<p>If FEMA determines a DIR is required per the PCA results, FEMA DIR Team will use the checklist in the FEMA SOG. FEMA's initiation of a DIR, if warranted, may be delayed based on FEMA's response in support of State and local recovery activities. Completion of DIR should be based upon estimated date for reactor start-up and electrical power grid needs. Under the National Response Framework, decisions regarding the restoration of electrical generation capability in support of power grid should be coordinated by the NRC Operations Center through the US Department of Energy.</p> <p>If deficiencies in offsite EP capabilities are significant, a confirmatory action letter is issued to ensure the NPP does not restart or may direct the NPP to shutdown</p>	<p>SOG NRC/FEMA MOU IM 1601</p>	<p>NRC RSLO participates in FEMA-led DIR, as necessary and appropriate to the representative skills.</p> <p>Based upon FEMA's findings and determinations, the <u>NRC</u> will make a determination on the suitability of ORO's emergency plans and may allow the NPP to restore operations (based upon offsite EP, other operational/technical issues specific to the NPP may require shutdown).</p> <p>If a FEMA DIR is conducted, once completed the NRC NRR Executive Team, NSIR management, Regional Management, etc. will determine appropriate follow-up actions (restart or shutdown).</p>	<p>See above actions.</p> <p>Actions based upon NRC determination.</p> <p>Communications on operations of the NPP should be between the utility and the NRC.</p>	<p>Communication is the key to ensure proper recovery priorities are set at the State EOC.</p> <p>10 CFR 50.54 (2)(ii) does not address post disaster actions</p>

Recommended Practices:

Conduct pre-hurricane season briefings:

- On-site briefing with station personnel to review preparation procedures and the PCA and DIR protocol.
- Initiated briefings with State/local Offsite Response Organizations (OROs), Regional FEMA and Regional NRC personnel to review the Post-Disaster evaluation process, develop relationships, and achieve a common understanding and expectations of the process.

Utilities should consider station leadership enhancing relationships with NRC RSLOs and FEMA RAC Chairs by meeting least annually (e.g. pre-Hurricane season) to discuss roles and responsibilities, and actions under various scenarios (e.g. direct hit from a hurricane requiring a DIR, PCA is only required post event, severe flooding event, etc.).