

FOCUSED SELF-ASSESSMENT:
EMERGENCY PREPAREDNESS SIGNIFICANCE DETERMINATION PROCESS
STAKEHOLDER COMMENT FORM

EP SDP FSA Comment Number: _____ (To be entered by NRC Staff)
Originator: <u>Dennis Earp</u>
Organization: <u>Shearon Harris Regulatory Affairs</u>
Relevant Procedure(s): <u>IMC 609 Appendix B, Emergency Preparedness SDP</u>
Applicable Section(s): <u>Table 5.11-1, Significance Examples for 10 CFR 50.47(b)(11)</u>
<i>Please return to Ray Gibson at the following email: Raymond.Gibson@nrc.gov</i>

COMMENT:

The use of the word "Adequate" in the Planning Standard and PS Functions related to 10 CFR 50.47(b)(8), Emergency Facilities and Equipment, can be somewhat ambiguous.

PROPOSED RESOLUTION:

Clarify the scope of the word "Adequate" as it relates to the maintaining of facilities and equipment to support emergency response.

NRC RESPONSE:

COMMENT:

Table 5.11-1, Significance Examples for 10 CFR 50.47(b)(11), discusses that the availability of additional equipment, on site, in a reasonable timely manner is considered a COMPENSATORY MEASURE for the PSF. In the event of having contracts with vendors, it's possible to have items delivered in a timely manner that could equally meet the intent of a COMPENSATORY MEASURE.

PROPOSED RESOLUTION:

Remove the words "on site" to better reflect that it is possible for additional equipment to be acquired in a reasonably timely manner that could be considered a COMPENSATORY MEASURE for the PSF, since COMPENSATORY MEASURES are only credited in determining the significance of the noncompliance. This is only in the event that standing contracts exist for the necessary equipment in question.

NRC RESPONSE: