

**DAVID YOUNG**

*Technical Advisor, Nuclear Security and Incident Preparedness*

1201 F Street, NW, Suite 1100  
Washington, DC 20004  
P: 202.739.8127  
dly@nei.org  
nei.org



September 7, 2018

Mr. Robert Kahler  
Chief, Regulatory Policy and Oversight Branch  
Division of Preparedness and Response  
Office of Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** NEI Reactor Oversight Process Whitepaper, "Change to the NEI 99-02 Text for the Drill/Exercise Performance Indicator – Initial Notification Form Accuracy"

Dear Mr. Kahler:

During a Reactor Oversight Process (ROP) public meeting on April 5, 2018,<sup>1</sup> the Nuclear Energy Institute<sup>2</sup> (NEI) introduced three white papers associated with emergency preparedness performance indicators to the NRC for review. One of the white papers proposed a change to the criteria for assessing the accuracy of an initial notification form used to provide information to an Offsite Response Organization (ORO); the criteria are presented in the "Drill/Exercise Performance" section of NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7. The change would eliminate the current guidance to report a Drill/Exercise Performance (DEP) opportunity failure for an incorrect form entry that would not impact the ability of an ORO to make a Protective Action Decision (PAD).

NEI and industry representatives met with the NRC on August 28, 2018, to discuss staff comments on the proposed change.<sup>3</sup> The white paper has been revised to address the comments provided in the meeting and the revised paper is attached to this letter.

We request a review of the attached white paper and a response indicating NRC approval for implementation.

---

<sup>1</sup> Refer to ADAMS Accession No. ML18109A397

<sup>2</sup> The Nuclear Energy Institute is the organization responsible for establishing unified industry policy on matters affecting its members, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, suppliers and nuclear materials licensees, nuclear medicine and radiopharmaceutical companies, companies using nuclear technologies in the agricultural, food, and industrial sectors, universities and research laboratories, law firms, labor unions, and international electric utilities.

<sup>3</sup> Refer to ADAMS Accession No. ML18205A361

Mr. Robert Kahler  
September 6, 2018  
Page 2

If you have questions or require additional information, please contact me at (202) 739-8127 or dly@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Young", with a long horizontal flourish extending to the right.

David L. Young

Attachment

c: Mr. Greg Bowman, NRR/DIRS/IRAB, NRC