

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: CHAIRMAN SVINICKI
SUBJECT: COMSECY-18-0013: Using National SAFER Response Center Resources During Exigent Situations

Approved XX Disapproved ___ Abstain ___ Not Participating ___

Comments: Below XX Attached ___ None ___

The aftermath of Hurricane Maria in Puerto Rico and the U.S. Virgin Islands provoked consideration of diverse measures to accelerate the restoration of basic services, including the dispatch of existing storehouses of response equipment, such as the nuclear industry's SAFER centers. This query posed novel considerations for the NRC, resulting in the evaluation the staff has presented here.

I approve the staff's recommended position allowing the use of Strategic Alliance for FLEX Emergency Response resources during a non-nuclear exigent situation. The staff should proceed with issuance of its updated assessment, as described in COMSECY-18-0013.



SIGNATURE

8 / 28 / 18

DATE

Entered on "STARS" Yes No ___

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: Commissioner Baran

SUBJECT: COMSECY-18-0013: Using National SAFER Response Center Resources During Exigent Situations

Approved Disapproved Abstain Not Participating

COMMENTS: Below Attached None

Entered in "STARS"

Yes

No



SIGNATURE

9/7/18

DATE

**Commissioner Baran's Comments on COMSECY-18-0013,
"Using National SAFER Response Center Resources during Exigent Situations"**

In this paper, the NRC staff recommends allowing Strategic Alliance for FLEX Emergency Response (SAFER) equipment to be deployed from one of the two national response centers during non-nuclear emergencies. The FLEX equipment in the two SAFER centers is a key part of the enhanced mitigation capabilities required by the Commission in the aftermath of the Fukushima nuclear accident. NRC allows licensees to reference the SAFER program to demonstrate compliance with the final phase requirements of the Commission's post-Fukushima mitigating strategies order (EA-12-049).

I agree with the staff that in the event of a severe natural disaster or other emergency that does not impact any nuclear power plants but does result in a dire need for the types of generators and pumps available in the SAFER centers, it is appropriate to deploy some of the SAFER equipment to assist in emergency response efforts. If lives could be saved with a portion of this equipment, it should not be kept under lock and key in Memphis or Phoenix. Limiting the deployment to no more than five sets of equipment from one SAFER center ensures that at least one center will remain fully stocked with five sets of equipment that could be deployed to address a nuclear emergency affecting multiple reactors. For these reasons, I approve the staff's recommendation, subject to the following conditions.

Clarity during a crisis is important so the Addendum to the SAFER White Paper that provides for non-nuclear emergency deployments should be clear about when the equipment will be made available. The Addendum should avoid unwritten assumptions or restrictions that could cause conflicts or misunderstandings with federal or state emergency managers. When issuing its updated assessment of the SAFER program, the NRC staff should require that the Addendum clearly state that nuclear power plants have priority access to the equipment in the event of an emergency that affects both nuclear and non-nuclear facilities. In my view, the current language is ambiguous on this central point. The staff's updated assessment should also require that the Addendum explicitly state that deploying equipment from a national response center should be a last resort for federal and state officials responding to a non-nuclear emergency.

The Addendum currently permits the SAFER organization three years to replace deployed SAFER equipment. Three years is a significant amount of time to have as little as half of the typical amount of SAFER equipment available. This represents a substantial reduction in the program's ability to respond to an event affecting multiple nuclear power plants. Because of the long lead times for ordering or manufacturing some pieces of SAFER equipment, it may be that three years is the shortest replacement time that is practical. But given the importance of the SAFER center equipment to the beyond-design-basis-event mitigating strategies of many nuclear power plants, the NRC staff should explore with the SAFER organization whether it is feasible to shorten the three-year period for replenishing a national response center's equipment after deployment for a nuclear or non-nuclear emergency. The staff should update the Commission on the outcome of these discussions in a Commissioners' Assistants note.

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: Commissioner Burns
SUBJECT: COMSECY-18-0013: Using National SAFER Response Center Resources During Exigent Situations

Approved ___ Disapproved X Abstain ___ Not Participating ___

Comments: Below X Attached ___ None ___

I appreciate the staff informing the Commission about this unique issue involving the staff's assessment of nuclear power reactor licensees' compliance with the Mitigation Strategies Order (Order EA-12-049), taking into account the use of SAFER resources for an exigent situation arising from a non-nuclear emergency. Although I did not identify any particular concerns with the staff's assessment of the issue or its ultimate conclusion that licensees can continue to reference the SAFER program for compliance with the requirements of Order EA-12-049, I do not consider staff's request a matter of Commission policy. Therefore, I take no position on this paper and would direct that the paper be returned to staff without further action by the Commission.

Entered in STARS

Yes x ___

No ___



SIGNATURE

24 August 2018

DATE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: Commissioner Caputo
SUBJECT: COMSECY-18-0013: Using National SAFER Response Center Resources During Exigent Situations

Approved X Disapproved ___ Abstain ___ Not Participating ___

Comments: Below X Attached ___ None ___

I agree with allowing the use of Strategic Alliance for FLEX Emergency Response (SAFER) resources during non-nuclear exigent situations as described in the COMSECY.

Entered in STARS

Yes X
No _____



SIGNATURE

08/28/2018

DATE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: Commissioner Wright

SUBJECT: COMSECY-18-0013: Using National SAFER Response Center Resources During Exigent Situations

Approved X Disapproved ___ Abstain ___ Not Participating ___

Comments: Below X Attached ___ None ___

Original vote date: August 28, 2018.

Entered in STARS

Yes ✓

No _____



SIGNATURE

8/29/18

DATE