

## Summary of Recommended Changes to Regulatory Guides 1.226 and 1.228 to Support Issuance of Final Mitigation of Beyond Design Basis Events Rule

NEI 06-12, "B.5.b Phase 2 & 3 Submittal Guideline"

- This document should be endorsed in its entirety as an acceptable method to meet the requirements of 10 CFR 50.155(b)(2).

NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities"

- The endorsement should make clear that the requirements of 10 CFR 50.155(f) do not apply to a change to communications equipment not directly related to implementation of mitigation strategies for beyond-design-basis external events (e.g., equipment used to make offsite notifications).
- The following paragraph was struck from the rule statements of consideration; however, it was not directly related to rule compliance. Rather, it was included to address important operating experience from inspections conducted in accordance with Temporary Instruction (TI) 2515/191, "Inspection of the Implementation of Mitigation Strategies and Spent Fuel Pool Instrumentation Orders and Emergency Preparedness Communication/Staffing/Multi-Unit Dose Assessment Plans." To maintain uniform understanding of offsite notification timing requirements going forward, wording similar to this paragraph should be included in the appropriate regulatory guide.

"Therefore, any communication capability enhancement made by a licensee in response to the assessment did not need to meet the design capabilities for the communications system required by 10 CFR part 50, appendix E or testing frequencies described for primary and backup onsite and offsite communications systems. Any enhanced communications system, equipment, or power supply implemented as a result of the § 50.54(f) assessment was not necessary to meet the requirement to notify offsite emergency response organizations within 15 minutes of an emergency declaration or to meet the monthly communications testing requirement for contiguous State/local governments within the plume exposure pathway emergency planning zone."

NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide"

- Any references to severe accident management/severe accident management guidelines and NEI 14-01, "Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents," should not be endorsed. Further, the endorsement wording should indicate that severe accident management guidelines are developed and maintained in accordance with licensee commitments.<sup>1</sup>

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<sup>1</sup> See NEI 12-06 Revision 4, Sections 1.3 and 11.4

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- The endorsement wording should be clear that licensee use of the Systematic Approach to Training (SAT) process is not necessary to meet the requirement of 10 CFR 50.155(d); it may or may not be used.<sup>2</sup>
- The endorsement wording should be clear that licensee implementation of drills and exercises is not necessary to meet the requirement of 10 CFR 50.155(d); they may or may not be conducted.<sup>3</sup>

### NEI 13-06, "Enhancements to Emergency Response Capabilities for Beyond Design Basis Events and Severe Accidents"

- Section 2, "Multi-Unit Dose Assessment," should not be endorsed.
- The endorsement wording should be clear that licensee use of the SAT process is not necessary to meet the requirement of 10 CFR 50.155(d); it may or may not be used.
- There should be no endorsement of the training guidance related to "qualifications."
- There should be no endorsement of the training guidance related to the "Ultimate Decision-Maker," nor its single reference in Appendix A.
- Section 4, "EP Facilities and Equipment," should not be endorsed.
- The endorsement wording should be clear that licensee implementation of drills and exercises is not necessary to meet the requirement of 10 CFR 50.155(d); they may or may not be conducted.
- The endorsement wording should state that the guidance for conducting drills and exercises involving Extensive Damage Mitigation Guidelines (EDMGs) may or may not be used to meet the "§ 50.54(hh)(2)" exercise requirement in 10 CFR 50, Appendix E, Section IV.F.2.j, at the licensee's discretion.

### NEI 14-01, "Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents"

- This document should not be endorsed as its contents are outside the scope of the rule.

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<sup>2</sup> See NEI 12-06 Revision 4, Sections 1.3 and 11.4

<sup>3</sup> See NEI 12-06 Revision 4, Sections 11.4.3 and 11.6