

September 10, 1979

C O R R E C T I O N N O T I C E

TO ALL COPY HOLDERS OF

SECY-79-499 - REPORT OF THE TASK FORCE ON EMERGENCY PLANNING
(COMMISSIONER ACTION ITEM)

AT THE REQUEST OF THE TASK FORCES' CHAIRMAN PLEASE REPLACE PAGE 2 OF
ENCLOSURE 3 "NRC ACTION PLAN FOR EMERGENCY PREPAREDNESS" TO ENCLOSURE 5 -
"FINAL REPORT OF TASK FORCE ON EMERGENCY PLANNING", WITH THE ATTACHED.

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ATTACHMENT:
REVISED PAGE

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One must presume that the long-range action plan will steer between these two extremes. Above all, we should be reluctant to set deadlines which are too short, or to promise more than we can deliver. Any change in rules will have no real impact until regulations and guidance have been coupled with a trained staff capable of implementing the objectives of that rule.*

II. Summary and Conclusions

It is generally accepted that recommendations for short-run actions by the NRC to include final publication of a new rule, should be completed by the end of calendar year 1979. The duration of the period of long-term actions by which NRC will implement and enforce the new rule has not been set. It can be inferred, logically, from a review of current legislative proposals, that NRC will have to demonstrate an increased ability to evaluate the adequacy of State-local-licensee plans for emergency response by no later than June of 1980, and have a long-run action plan and schedule developed prior to that time.

Table 1 is a proposed schedule which generally describes the decision points and milestones which must be met if the Commission's intention for short-run action is to be met.**

Recommendations for development of a long-range plan of action are discussed in Section VI. of this report.

TABLE 1

PROPOSED SCHEDULE FOR SHORT-TERM EMERGENCY RESPONSE ACTIONS

17 July	Federal Register notice of proposed rulemaking.
10 August	Final report to the Commission by the Task Force on Emergency Planning. Task Force on Emergency Planning is dissolved.
31 August	End of public comment period on notice of proposed rulemaking.
<u>21 September</u>	SD forwards analysis of public comments on notice of rule-making to include suggested modifications to Appendix E. (Commission briefing)
<u>1 October</u>	Commission completes review of draft rule.
<u>9 October</u>	Draft rule published for 45-day comment.
21 September to 31 October	SD initiates <u>recommended</u> revisions to Parts 30, 40, 50, and 70 and <u>Regulatory Guides 1.101, 3.42, and 2.6.</u> IE revises Manual Chapter 0502.
<u>23 November</u>	Comment period on rule closes.
14 December	SD completes analysis of comments and incorporates into a final rule. (Commission briefing)
17-31 December	Commission completes review of final rule.
<u>8 January</u>	Final rule published.

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* See "National Planning for Peacetime Nuclear Emergencies (PNE) 1975-1979," submitted separately to the Commission July 17, 1979, for more on difficulties in emergency planning and preparedness.

**This schedule agrees basically with guidance in a memo, Chilk to Gossick, July 31, 1979, subject: "Commission Guidance on Emergency Planning Rulemaking."

August 21, 1979

SECY-79-499

Vassallo
~~*Skouholt*~~
Targa
L. Miller

COMMISSIONER ACTION

For: The Commissioners

From: Lee V. Gossick
Executive Director for Operations

Subject: REPORT OF TASK FORCE ON EMERGENCY PLANNING

Purpose: To obtain Commission action on the recommendations of the Task Force on Emergency Planning.

Discussion: The Task Force on Emergency Planning was established in June 1979 to identify weaknesses in NRC's emergency preparedness process and to outline an approach for improving NRC's overall emergency preparedness activities. The Task Force Report, submitted on August 9, 1979, is provided as Enclosure 5. The report is being placed in the Public Document Room and will be published shortly as a NUREG document.

To assist the Commission in its review of the Task Force Report, MPA has summarized the issues, problems, and tasks described in the report. This summary is provided as Enclosure 1.

As one of its major efforts, the Task Force developed a list of 14 emergency planning issues (Enclosure 2). Public comment on these issues was solicited in a July 17, 1979 advance notice of proposed rulemaking. Comments will be analyzed and incorporated into a draft rule that will follow the usual rulemaking process. The final rule is expected to be published January 15, 1980.

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Two closely related issues particularly relevant to the rulemaking involve the possibility of making the operation of nuclear power plants contingent upon NRC-approved State and local emergency plans. These issues would apply to reactors already in operation and to those being built. The other 12 issues can also be associated with current emergency preparedness problem topics identified by the Task Force.

The Task Force identified 30 such problem topics in analyzing NRC's current emergency preparedness process. These problems are listed in Enclosure 3. Each office developed specific tasks for resolving these problems. A list sorting all office tasks into the 30 problem topics is provided as Enclosure 4. MPA will track progress on the tasks through the Decision Unit Tracking System.

The office tasks involve short-term actions, some of which are already underway, and long-term tasks that form the basis for developing a comprehensive long-range plan for all of NRC's emergency preparedness activities. Management and coordination of these office efforts will be needed to assure that they are coordinated and integrated into a single, coherent agency plan to deal with emergency preparedness problems.

The Task Force Report indicates the need for 44 additional people to accomplish the tasks laid out by each office. The Task Force's Report was completed before the Commission's review of NRC's FY 1980 supplemental and FY 1981 budget. Consequently resource requirements identified in the Task Force Report differ somewhat from those described in the budget presentations.

Because the offices have already started working on many of the tasks identified in the report, the Task Force's recommendations require prompt Commission attention. It is particularly important to determine what technique we should use to assure effective management and coordination of an integrated emergency preparedness program. For example:

1. Should NRC emergency preparedness oversight be handled by an ad-hoc committee? If so, what NRC offices should be represented on the committee?
2. Should a separate organization be formed and assigned the lead for emergency preparedness?
3. Should a new position be created for a "Technical Assistant to the EDO for Emergency Preparedness?"
4. How should an integrated, long-range plan for emergency preparedness be developed and implemented?

Scheduling:

We are tentatively scheduled to present a briefing on the Task Force Report and its recommendations during the week of September 10th.

Recommendation:

That the Commission consider the recommendations of the Task Force as soon as practicable.



Lee V. Gossick
Executive Director for Operations

Enclosures:

1. Summary of Final Report of Task Force on Emergency Planning
2. Issues for Consideration in Rulemaking
3. Problems Identified by Task Force
4. Office Tasks Sorted by Problem
5. Final Report of Task Force on Emergency Planning

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Commissioners' comments should be provided directly to the Office of the Secretary by c.o.b. Friday, September 14, 1979.

Commission Staff Office comments, if any, should be submitted to the Commissioners NLT September 5, 1979, with an information copy to the Office of the Secretary. If the paper is of such a nature that it requires additional time for analytical review and comment, the Commissioners and the Secretariat should be apprised of when comments may be expected.

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ENCLOSURE 1

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MPA Summary of Report of Task Force on Emergency Planning

In June 1979, the EDO established the Task Force on Emergency Planning in response to the TMI-2 accident, recommendations from a GAO report,^{1/} and various petitions for rulemaking from interest groups. The Task Force was asked to develop a list of major issues to be considered for proposed rulemaking, examine NRC's current emergency preparedness process, and recommend an approach to NRC's overall emergency planning activities.

The Task Force identified fourteen issues that were published for comment on July 17, 1979 in the Federal Register in an advance notice of proposed rulemaking. After analysis of public comments, SD will draft a rule that will follow the usual rulemaking process. The final rule is expected to be published January 15, 1980.

The rulemaking issues concern broad aspects of emergency planning, such as: should NRC concurrence in State and local plans be required for a reactor to operate; what should be the objectives of emergency planning; how can financial assistance be provided to State and local governments; what should be the requirements for evacuation plans and drills; what should be the criteria for emergency plans; and how should Federal, State, local, public, and licensee emergency response efforts be integrated? Particularly relevant to rulemaking are the issues pertaining to concurrence in State and local plans. The other issues can be associated with current emergency planning problems identified by the Task Force.

The Task Force identified 30 problems in examining NRC's current process. These problems lie in six areas of concern to NRC: (A) responsibility and authority of emergency planning agencies; (B) the planning process; (C) appropriate preparedness regulations and guidance to licensees and Federal, State, and local governments; (D) the licensing process; (E) emergency response implementation; and (F) emergency response testing and verification capability. Individual offices used these problems as a basis for laying out specific remedial tasks. The short term tasks are expected to be completed by January 1, 1980 and long-term ones by 1984.

Resources

The Task Force identifies the need for 44 additional people. These people are needed for the following activities:

^{1/}"Areas Around Nuclear Facilities Should be Better Prepared for Radiological Emergencies," March 1979.

<u>People</u>	<u>Office</u>	<u>Activity</u>
8	NRR	Evaluation/Instruction Teams
7	NMSS	Environmental radiation and emergency support
19	IE	5 watch officers; 10 regional inspectors; 4 for planning and operations support.
8	SP	Quasi-regulatory field activities and inter-agency planning and coordination.
2	SD	Restructuring of regulations

The Task Force Report recommends:

1. Give prompt high-level management attention to emergency preparedness activities.
2. Establish a committee to integrate, coordinate, and direct NRC's emergency preparedness activities and assure publication of rule by January 15, 1980. The life of the committee should be for 2 years.
3. Create a position entitled, "Technical Assistant to the EDO for Emergency Preparedness" to chair the committee or as an alternative elect a chairman from the committee.
4. Develop an integrated, comprehensive, long-range plan for all of NRC's emergency preparedness activities.
5. Disband the Task Force because it has fulfilled its responsibilities and lacks authority to compel sustained interoffice participation.

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ENCLOSURE 2

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14 ISSUES FOR CONSIDERATION IN RULEMAKING

(published in FRN July 17, 1979)

1. Basic emergency planning objectives
2. Effective emergency response plan contents and guidance
3. State and local emergency plan requirement for continued operation
4. State and local emergency plan requirement for new license
5. Financial assistance to state and local governments
6. Emergency response drill requirements
7. Notification of public prior to emergency
8. Actions in response to recommendations in NRC/EPA Task Force report
9. Incident/emergency notification criteria
10. State/local/licensee influence on federal emergency plans
11. Federal, state and local government interface during an emergency
12. Radiological emergency response training responsibilities
13. Reliance placed on licensee for assessing consequences of accident
14. Public participation in emergency response drills

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ENCLOSURE 3

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30 Problems of Current NRC Process
Identified by the Task Force on Emergency Planning

Lead Office

<u>A. Responsibility/Authority</u>	
1. NRC's statutory responsibilities in FRPPNE unclear	SP
2. Interagency coordination ill-defined	SP/IE
3. Funding of State and local agencies to support EP* not integrated	SP
4. Transportation EP inadequate	NMSS
5. NRC role in EP inadequately defined	IE
6. Licensee responsibility for offsite EP exceeds authority	NRR/NMSS
<u>B. Planning Process</u>	
1. NRC efforts currently fragmented	EDO
2. Incident Response Program incomplete	IE
3. Consideration of Class 9 accidents in licensees' plans not required	NRR/NMSS
4. NRC responsibility in FRPPNE not implemented	SP
5. EP research not comprehensively evaluated	SP
6. No NRC control over resources of other agencies assigned to RAC	SP
<u>C. Regulations and Guidance</u>	
1. NRC EP guidance non-specific	NRR/NMSS/SP
2. EP regulations and their application inconsistent and incomplete.	SD
3. Protective Action Guides not uniformly adapted or implemented	SP
<u>D. Licensing</u>	
1. Actual offsite capability not fully assessed by NRC	NRR/NMSS
2. NRC concurrence in State plans not related to licensing process	SP
3. Assistance to States not formally coupled to licensing process	SP
4. Generic treatment of EP issues in public hearings lacking	SD
<u>E. Implementation</u>	
1. Coordination of Federal response affecting licensed facilities insufficient	SP/IE
2. Inspection and licensing EP efforts not closely integrated	NRR/NMSS/IE
3. Upgrade of operating facility plans to current criteria	NRR/NMSS
4. Incident response criteria for notifying NRC too loose	IE/SD
5. NRC response capability not fully established	IE

* EP = emergency preparedness

E. Implementation, cont'd.

- | | |
|--|-------------|
| 6. Near-to-site facility for response personnel non-existent | IE/EDO |
| 7. NRC monitoring capability inadequate | NRR/NMSS/IE |
| 8. Procedures for informing public of accident status inadequate | EDO/PA |

F. Testing and Verification Capability

- | | |
|---|-------------|
| 1. NRC-wide audit of EP non-existent | EDO |
| 2. Criteria for drills undefined | NRR/NMSS/SP |
| 3. Continued evaluation of training and qualification of State and local personnel non-existent | SP |

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ENCLOSURE 4

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Office Tasks Sorted by ProblemA. Responsibility/AuthorityCompletion

Problem A-1 - FRPPNE SHOULD BE CLARIFIED WITH RESPECT TO NRC'S STATUTORY RESPONSIBILITIES

SP Tasks

- | | |
|--|------------|
| a. Query FEMA on status of FRPPNE | Immediate |
| b. If FRPPNE still operative, review FRPPNE and Atomic Energy Act for potential conflicts; propose changes. | Immediate |
| c. If FRPPNE is not operative, use results of "b." in NRC contribution to any successor to FRPPNE. | Immediate |
| d. Work with FEMA to develop the President's "National Contingency Plan;" take position that the "National Contingency Plan" replace FRPPNE, and perhaps IRAP. | Early 1980 |

Problem A-2 - FORMAL ARRANGEMENTS ARE ILL-DEFINED FOR INTER-AGENCY (FEDERAL, STATE, AND LOCAL) COORDINATION. THE PROCESS CURRENTLY IS ON A VOLUNTARY BASIS.

SP Tasks - FRPPNE

- | | |
|---|------------|
| a. Outline what agencies should be involved in Federal coordinated radiological emergency response and how coordination should take place. Seek other agencies' agreement. | Immediate |
| b. Outline how Federal agencies should relate to and coordinate with State and local government agencies in such an emergency response. Seek other agencies' agreement. | Immediate |
| c. Use comments on Advance Notice of Proposed Rulemaking for other ideas on respective roles and coordination of Federal, State, and local governments. | Immediate |
| d. Complete NRC agency response plan. | March 1980 |
| e. Stake out prominent role for NRC in development of the National Contingency Plan under FEMA leadership. | Early 1980 |
| f. Work with FEMA to seek a consensus among State and local governments in radiological emergency response and include this consensus in NRC and National Contingency Plan. | Early 1980 |
| g. Include appropriate language in NRC regulations related to State and local radiological emergency response plans. | March 1980 |

IE Tasks - IRAP

- | | |
|---|----------------|
| a. Meet with Forest Service concerning support. | August 1979 |
| b. Identify problems re TMI-2; IRAP agencies and others meet. | September 1979 |
| c. Revise and rewrite IRAP. | Long Term |

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Problem A-3 - THERE IS NO INTEGRATED FEDERAL MECHANISM FOR THE FUNDING OF STATE AND LOCAL AGENCIES TO SUPPORT RADIOLOGICAL EMERGENCY PREPAREDNESS

SP Tasks

- a. Complete the NRC Funding Study (Saloman Report, NUREG-0553). Immediate
- b. Based on Saloman Report, outline options for future action by NRC and FEMA. Immediate
- c. Request FY 80 budget supplemental to assist States and local governments. Immediate
- d. Develop proposed rulemaking or legislation to resolve the funding problem. December 1980

Problem A-4 - RADIOLOGICAL EMERGENCY RESPONSE PLANNING FOR TRANSPORTATION ACCIDENTS IS INADEQUATE

NMSS Tasks

- a. Urge DOT to do rulemaking to install the necessary regulations for augmenting transportation safety. Long Term
- b. If "a" is unsuccessful, seek legislative authority to effect the recommendations of the NRC/DOT Task Force in NUREG-0535. Long Term

Problem A-5 - NRC HAS NOT ADEQUATELY DEFINED ITS ROLE IN EMERGENCY RESPONSE

IE Tasks

- a. Coordinate with NRR, NMSS, and SP on development of work statement to define spectrum of potential NRC roles. Short-Term
- b. Prepare report on NRC role. June 1980
- c. Prepare Commission discussion paper on NRC role. Long Term

Problem A-6 - THE LICENSEE'S RESPONSIBILITY EXCEEDS HIS AUTHORITY WITH RESPECT TO OFFSITE EMERGENCY PLANNING

NRR Tasks - Reactors

- This area is not to be specifically addressed in the NRR action plan.

NMSS Tasks - Fuel-cycle Facilities

- a. Exact through licensees the necessary arrangements for supporting activities of State and local agencies having emergency response roles. March 1980
- b. Exact through byproduct material licensees the necessary arrangements for supporting activities of State and local agencies having emergency response roles. October 1980

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B. Planning Process

Completion

Problem B-1 - FOR THE EMERGENCY PLANNING PROCESS, NO EFFECTIVE MECHANISM EXISTS WITHIN NRC FOR ASSURING CONSISTENCY AND THE INTEGRATION OF GUIDANCE, i.e., THE EFFORT IS CURRENTLY FRAGMENTED

EDO Tasks

- a. Recognize lead offices for the following areas of responsibility: Short Term
 - NRC command and control, including the Incident Response Center (IE)
 - Radiological monitoring including equipment identification and development of IRACT response (IE)
 - Site licensing including retroactive actions and new rule development (NRR or NMSS)
 - Training and staff assistance to licensees and State and local government (SP)
 - Public information policy during emergencies (PA)
- b. Establish an emergency preparedness organization to provide a focal point for staff action. Short Term

Problem B-2 - NRC INCIDENT RESPONSE PROGRAM NEEDS EXPANSION AND FURTHER DEVELOPMENT.

IE Tasks

- a. Upgrade Operations Center communications. August 1979
- b. Improve Operations Center heating, ventilating, and air conditioning. August 1979
- c. Revise Manual Chapter 0502 without defining NRC's role. October 1979
- d. Upgrade Operations Center furniture. December 1979
- e. Upgrade Operations Center audiovisual support. December 1979
- f. Upgrade Operations Center support staff. December 1979
- g. Incorporate appropriate national-level planning in guidance. Short Term
- h. Increase incident response program manpower by 2 Long Term
- i. Upgrade Operations Center to handle data input (per Sandia Study). Long Term
- j. Expand Operations Center to adequately support incident response activities on extended basis. Long Term
- k. Upgrade recording capabilities; revise telephone system. Long Term
- l. Upgrade field communications. Long Term
- m. Develop rulemaking to determine who pays for communications at licensee sites. Long Term

Completion

Problem B-3 - THE LICENSEE'S PLANNING IS BASED ON ACCIDENTS OF SEVERITY UP TO AND INCLUDING THE MOST SERIOUS DESIGN BASIS ACCIDENTS.

NRR Tasks - Reactors

- a. Revise proposed changes to Appendix E to reflect NUREG-0396 guidance; backfit Regulatory Guide 1.97 from TMI lessons learned. Short term
- b. Determine instrumentation needed to follow the course of an accident in support of SD revision of Regulatory Guide 1.97. Long Term

NMSS Tasks - Fuel-cycle Facilities

- a. Assess 10 CFR Part 70 emergency plans for adequacy in dealing with accident situations more severe than the design basis accidents; Short Term
Backfit plans where needed (Schedule same as E-3)- Long Term
- b. Request selected Part 30 and 40 licensees to submit emergency plans addressing severe accident situations. July 1980
- c. Establish through rulemaking requirements for emergency plans to deal with more severe consequences than the accidents considered in the Safety Evaluation Reports prepared in support of licensing actions. July 1981

Problem B-4 - THE NRC RESPONSIBILITIES DELINEATED IN FRPPNE HAVE NOT BEEN IMPLEMENTED WITHIN THE NRC.

SP Tasks

- a. Determine if FEMA expects NRC and other Federal agencies to do planning outlined in FRPPNE. (See A-1) Immediate
- b. Take position that "National Contingency Plan" replace FRPPNE and perhaps IRAP (See A-1). Early 1980
- c. Prepare NRC agency plan and work with FEMA to develop the President's "National Contingency Plan." Immediate
- d. Start work on NRC agency response plan and the "National Contingency Plan" called for in the Senate NRC Authorization Bill. Immediate
- e. Assure that the NRC agency plan is compatible and is an appropriate part of the "National Contingency Plan." Early 1980

Problem B-5 - THE NEED FOR RESEARCH OR STUDIES IN THE EMERGENCY RESPONSE AREA HAS NOT BEEN COMPREHENSIVELY EVALUATED.

SP Tasks

- a. List completed and ongoing emergency preparedness studies conducted in and for NRC. Immediate
- b. Determine what emergency preparedness studies are ongoing or completed at other Federal agencies, Immediate
- c. Seek NRC proposals for additional research studies. 1071 27 Immediate

Completion

SP Tasks, cont'd.

- d. Prepare research study proposals identified in "c."
- e. If required, prepare additional research study proposals on emergency preparedness identified by TMI investigative groups.

September 1980
Long Term

Problem B-6 - NRC HAS NO CONTROL OVER OTHER AGENCY RESOURCES ASSIGNED TO THE REGIONAL ADVISORY COMMITTEES (RAC'S)

SP Tasks

- a. Send letters to appropriate Federal agencies to recommit regional resources in terms of people and funds for RAC's.
- b. Have FEMA possibly reestablish the RAC's on a formal basis for all-hazards emergency planning.
- c. If "a" and "b" are unsuccessful in improving the control situation, consider legislative remedy.

Immediate
June 1980
Long Term

C. Regulations and Guidance

Problem C-1 - NRC EMERGENCY PLANNING GUIDANCE NEEDS IMPROVEMENT

NRR Tasks - Reactors

- a. Elaborate in Regulatory Guide 1.101 on uniform action level criteria.

July 1980

NMSS Tasks - Fuel-cycle Facilities

- a. Establish an interim position on requirements for non-reactor licensee emergency plans.
- b. Modify Regulatory Guide 3.42, Revision 1.
- c. Extend requirements for emergency planning to other Part 70 licensees and to Parts 30 and 40 licensees; develop and promulgate appropriate guidance.

Long Term
July 1981
December 1981

SP Tasks

- a. Develop acceptance criteria for existing State and local government emergency planning guidance.
- b. Provide standardized scenarios to test licensee, State, and local government emergency plans.
- c. Prepare letters to other Federal agencies encouraging them to complete their guidance documents.
- d. Carry over the acceptance criteria concept into regulations in accordance with expected legislative mandate.
- e. Develop improved guidance handbook for Federal agency assistance activities with the States.
- f. Prepare an improved guidance document for the States and local governments.

Immediate
Immediate
Immediate
June 1980
June 1980
June 1980

Problem C-2 - REGULATIONS HAVE VOIDS OR INCONSISTENCIES RELATED TO EMERGENCY PLANNING.

SD Tasks

- a. (Require Part 50 and Part 70 licensees to maintain current emergency plans and require research reactors to submit an emergency plan for NRC review and approval.)
- b. Evaluate the need for an "Appendix E" for Part 30 and Part 40 licensees.

Short Term

Long Term

Problem C-3 - PROTECTIVE ACTION GUIDES (PAG's) HAVE NOT BEEN PROMULGATED AS OFFICIAL FEDERAL GUIDANCE.

SP Tasks

- a. Prepare letters to EPA and HEW urging prompt action on converting "Agency guidance" PAG's to official Federal guidance PAG's.

Immediate

D. Licensing

Problem D-1 - DURING THE LICENSING PROCESS, NRC DOES NOT FULLY ASSESS ACTUAL OFFSITE CAPABILITY BUT LIMITS EXAMINATION TO THE PLEDGES OF RESOURCES.

NRR Tasks - Reactors

- a. Assess offsite capabilities in licensing process

Short Term

NMSS Tasks - Fuel Cycle Facilities

- a. Establish locations of existing State and local capabilities to cope with emergencies at licensee locations.
- b. Categorize licensees based on offsite impacts; set priorities for action and assign required offsite response needs to each.
- c. Assess and confirm the offsite capabilities by actual inspection and discussions with licensees and State and local agencies.
- d. Assist all parties in developing adequate emergency plans.

March 1980

October 1980

Long Term

Long Term

Problem D-2 - THE NRC "CONCURRENCE" RELATED TO STATE PLANS IS NOT DIRECTLY RELATED TO THE LICENSING PROCESS.

SP Tasks

- a. Push for plan concurrences in States that have operating nuclear power plants using existing guidance and procedures.
- b. Begin codifying existing guidance into regulations.
- c. Complete above tasks in accordance with time frames specified in expected legislation.
- d. Shift from a concurrence process to an approval process using the new regulations.

Immediate

Immediate

June 1980

June 1980

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Problem D-3 - THE ASSISTANCE TO STATES IS NOT FORMALLY COUPLED TO THE LICENSING PROCESS.

SP Tasks

- The emergency preparedness assistance program need not be coupled to the licensing process.

Problem D-4 - BECAUSE OF THE LACK OF A GENERIC TREATMENT OF EMERGENCY PLANNING ISSUES IN PUBLIC HEARINGS, THE SAME CONTENTIONS REPEATEDLY OCCUR IN PUBLIC PROCEEDINGS AND PLACE AN UNDUE BURDEN ON THE STAFF.

SO Tasks

- a. To ensure generic treatment of emergency preparedness issues:

- 1. Revise or develop Regulations and Regulatory Guides.

Short Term

- Appendix E, Guide 1.101, and Guide 1.97
- A proposed regulation requiring concurrence in State/local plans as a condition for power reactor licenses.
- A proposed regulation requiring joint test exercises once each five years and within one year of initial plant operation.
- Revision 2 of Guide 1.89 on qualification of equipment.
- A proposed rule or policy statement on the emergency planning feasibility in considering alternative sites in the licensing process.

- 2. Resolve Critical Mass Petition for Rulemaking, revise Reg. Guides 1.101, 3.42, and 2.6.

October 1980

- 3. Develop emergency preparedness regulations for research reactors and reassess regulations for Part 70 and Part 30 licensees.

October 1981

E. Implementation

Problem E-1 - INSUFFICIENT NRC ATTENTION HAS BEEN GIVEN TO COORDINATING THE FEDERAL RESPONSE AFFECTING LICENSED FACILITIES.

SP Tasks - FRPPNE

- Tied to other actions ones dealing with FRPPNE and IRAP and with NRC's incident response program in A-1, A-2, and B-4.

Short Term

IE Tasks - IRAP

- See A-1, A-2, and B-4.

Problem E-2 - LICENSING AND INSPECTION RESOURCES NEED EXPANSION TO BETTER IMPLEMENT THEIR EMERGENCY PLANNING EFFORTS.

NRR Tasks - Reactors

- Evaluate licensee plans against current criteria (E-3) Short Term
- Budget process to support Reg. & guide Changes, offsite monitoring, information gathering Long Term

NMSS Tasks - Fuel-cycle Facilities

- a. Install an Environmental Radiation and Emergency Support Section (ERESS) that will guide and coordinate NMSS activities relative to emergency preparedness. Fall 1979

IE Tasks

- a. Annually observe licensee emergency plan drills for power reactors. Short Term
- b. Revise manual procedures based on results from initial inspections. April 1980
- c. Evaluate State agency readiness:
 - Develop procedures for evaluating State agency performance.
 - Annually conduct evaluations as part of routine inspections.
- d. Develop emergency preparedness activity requirements for material licensees:
 - Identify categories of licensees that should be included. October 1979
 - Develop and improve requirements (NMSS) January 1980
 - Develop procedures for inspecting licensees July 1980
 - Commence inspections. October 1980

Problem E-3 - THE MAJORITY OF OPERATING FACILITIES HAVE NOT BEEN EVALUATED AGAINST THE STAFF'S CURRENT CRITERIA FOR EMERGENCY PLANNING.

NRR Tasks - Reactors

- Evaluate licensee plans against current criteria Short Term

NMSS Tasks - Fuel-cycle Facilities

- a. For those NMSS licensees already required to have approved emergency plans:
 - Define current criteria Short Term
 - Review existing requirements, guidance, and licensee plans and define deficiencies Short Term

NMSS Tasks

- b. For those NMSS licensees not presently required to have approved emergency plans:
 - Seek short-term remedies in existing regulations and guides. Short Term
 - Implement short-term remedies for high-risk licensees by Branch positions or mutual agreements with licensees. Short Term
- c. Develop requirements for approved emergency plans for activities licensed under Parts 30, 40, and 70 and install through rulemaking December 1980
 - Develop and promulgate necessary guidance. July 1981

Problem E-4 - THE INCIDENT RESPONSE CRITERIA FOR TIMELY NOTIFICATION OF THE NRC NEED TO BE TIGHTENED.

IE Tasks - Criteria

- a. Adjust criteria based on responses by licensees until appropriate type and degree of information is obtained. Short Term
- b. Revise procedures for handling information within NRC Short Term
- c. Revise HQ Incident Response Plan and inform licensees of revisions. Long Term

SD Tasks - Regulations

- a. Review and analyze NRC's current rules, records, and practices involved in petitioner considerations: Unspecified
 - Radioactivity in effluents to unrestricted areas
 - Notifications of incidents
 - Emergency plans for production and utilization facilities
 - Emergency plans for production and utilization facilities
 - Emergency plans for Part 50 and Part 70 licensees
 - Regulatory Guides 1.101 and 1.16, Appendix A.

Problem E-5 - AN ORGANIZED "FACILITY CLASS ORIENTED" NRC RESPONSE CAPABILITY HAS NOT BEEN FULLY ESTABLISHED.

IE Tasks

- a. Identify incident response organization both at HQ and site. Short Term
- b. Begin exercise program to retain proficiency gained during TMI-2 experience. March 1980

Problem E-6 - THERE IS A NEED DURING AN ACTUAL EMERGENCY FOR NEAR-TO-THE-SITE FACILITY TO HOUSE THE MULTI-AGENCY COORDINATION AND RESPONSE SUPPORT ACTIVITY

IE Tasks

- a. Integrate site support and functions with Regional Office response Short Term
- b. Identify operational and support requirements and have ADM make prearrangements to obtain support during incidents; incorporate in Incident Response plans. Short Term
- c. Based on definition of NRC role; revise existing support capabilities. Long Term

EDO Tasks

- a. Likely designate IE lead office. Long Term
- b. Define emergency preparedness responsibilities to avoid overlap; coordinate IRAP and DOE resources Long Term
- c. Integrate drills or tests of response plans into the program. Long Term
- d. Explore modular concepts for facility. Long Term
- e. Give priority to radiological monitoring. Long Term
- f. Assign NMSS and NRR responsibility for providing technical personnel and equipment for mobilization of the response teams. Long Term

Problem E-7 - NEED EXISTS FOR EXPANDED NRC MONITORING CAPABILITY

NRR Tasks - Reactors

- a. Develop lists of parameters needed for expanded monitoring capability Short Term

NMSS Tasks - Fuel-cycle Facilities

- a. Survey licensee activities having the potential for significant offsite adverse impacts due to accidents, sabotage, or severe natural phenomena through a survey questionnaire. Short Term
- b. Analyze data for possible NMSS-unique monitoring requirements. Short Term
- c. Equip NRC response teams to assess environmental contamination resulting from unplanned releases from NMSS-licensed activities. Long Term
- d. Identify likely contaminant isotopes and levels as part of licensee emergency plans to be required by regulation. Long Term
- e. Convey any special monitoring needs for evaluation and implementation to IE. Long Term

Completion

IE Tasks

- a. NRC offices will identify areas where expanded NRC monitoring capabilities are necessary:
 - Define operational parameters January 1980
 - Define environmental monitoring capability October 1979
 - Define plant discharge monitoring needs January 1980
- b. Procure equipment and develop procedures for use:
 - Place TLD's around operating power reactors January 1980
 - Collect NRC's TLD's. January 1980
 - Order monitoring equipment April 1980
 - Develop budget supplement not included in above. April 1980
- c. Procure equipment/data links for NRC Incident Response Center:
 - Procure operational parameters April 1980
 - Procure plant discharge monitors July 1980

Problem E-8 - PROCEDURES FOR DISSEMINATION OF PUBLIC INFORMATION ARE NOT ADEQUATE

EDO Tasks

- a. Coordinate development plan for information policy during future emergencies:
 - Designate a primary NRC spokesman Short Term
 - Issue a pre-announced schedule of statements, press conferences, and bulletins; discuss source term monitoring results; buildup of emergency response assets; relationships with cooperating agency spokesmen, State and local designated spokesmen, and licensee spokesmen; specific areas of NRC lead authority.

F. Testing and Verification Capability

Problem F-1 - THERE HAS NEVER BEEN AN NRC-WIDE AUDIT OF THE EMERGENCY RESPONSE FUNCTION

EDO Tasks

- a. Make a self-audit of the agency emergency preparedness program. December 1980

Problem F-2 - EVALUATION CRITERIA FOR DRILLS/EXERCISES ARE NOT DEFINED

NRR Tasks - Reactors

- a. Develop criteria for joint exercises. 1071 232 Short Term

NMSS Tasks - Fuel-cycle Facilities

- a. Possible second review of post-licensing emergency plans for fuel-cycle facilities Short Term

Completion

NMSS Tasks (continued)

- | | |
|--|------------|
| b. Review emergency plans submitted in support of renewal applications | Short Term |
| c. Integrate renewal application criteria with development of criteria for review of new emergency plans. | Long Term |
| d. At five-year intervals, reevaluate emergency plans against up-to-date criteria. | Long Term |
| e. Develop and/or adopt from NRR, criteria and procedures for post-licensing reassessment of emergency support capabilities. | Long Term |

Problem F-3 - THERE IS NO EFFECTIVE NRC MECHANISM FOR CONTINUED EVALUATION OF THE TRAINING AND QUALIFICATION OF KEY STATE AND LOCAL EMERGENCY RESPONSE PERSONNEL

SP Tasks

- | | |
|---|----------------|
| a. Determine the attrition of NRC-trained emergency response personnel since March 1975. | Immediate |
| b. Determine training and replacement training needs of States and local governments for the next five years. | Immediate |
| c. Establish Federal mechanism to certify emergency planning and response personnel. | June 1980 |
| d. Establish re-training programs. | September 1980 |
| e. Establish additional required training programs. | December 1980 |