



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 17, 2019

Michael S. Casey, Ph.D.
Director
Technological Hazards Division
Federal Emergency Management Agency
400 C Street, South West
Washington, DC 20024

SUBJECT: RE: WOLF CREEK GENERATING STATION AND COFFEY COUNTY ALERT
AND NOTIFICATION SYSTEMS CHANGE EVALUATION REPORT –
INTEGRATION OF INTEGRATED PUBLIC ALERT AND WARNING SYSTEMS

Dear Dr. Casey:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter of November 1, 2019, Agencywide Documents Access and Management System (ADAMS) Accession No. ML19339G750 forwarding the Federal Emergency Management Agency (FEMA) Evaluation Report of the updated Wolf Creek Generating Station (WCGS) and Coffey County Integrated Public Alert and Warning Systems (IPAWS) Design Report and Alert and Notification Systems (ANS), August 6, 2019, (ADAMS Accession No. ML19339G860).

Per Section III, Paragraph 2 of the “Memorandum of Understanding (MOU) between the Department of Homeland Security/Federal Emergency Management Agency and the Nuclear Regulatory Commission Regarding Radiological Emergencies, Planning, and Preparedness,” which was signed on November 19, 2015, (ADAMS Accession No. ML15344A371):

“FEMA coordinates all Federal planning for offsite impact of radiological emergencies and takes the lead for assessing offsite radiological emergency response plans and preparedness, makes findings and determinations as to the adequacy and capability of implementing offsite plans, and communicates those findings and determinations to the NRC. The NRC reviews FEMA's findings and determinations in conjunction with the NRC onsite findings for the purpose of making determinations on the overall state of emergency preparedness. These overall findings and determinations are used by the NRC to make radiological health and safety decisions in the issuance of licenses and the continued operation of licensed utilization facility to include taking enforcement actions such as notices of violations, civil penalties, orders, or shutdown of operating reactors. This delineation of responsibilities avoids duplicative efforts by the NRC in preparedness matters.”

Consistent with the roles of each respective agency as set forth in the aforementioned MOU, the NRC conducted a review of the FEMA findings. To aid its review, the NRC utilized the FEMA

evaluation criteria and sample template for ANS changes and use of IPAWS, (ADAMS Accession No. ML19339G862). The NRC review focused on the applicable requirements in 10 CFR 50, Appendix E, Section IV.D.3.

Additionally, the NRC evaluated the updated WCGS and Coffey County ANS Design Report and found that it contained sufficient information to be considered an adequate submittal for NRC to conduct its review, consistent with the MOU. At this time, the NRC did not identify any licensing basis issues.

In conclusion, the NRC accepts the findings of FEMA that the updated WCGS and Coffey County ANS system, which employs the use of IPAWS as the primary means and route alerting as the backup means of notification, enables NRC to make a finding of reasonable assurance for public health and safety.

A summary of the NRC review is enclosed with this letter.

Please feel free to contact Robert Kahler, of my staff at (301) 287-3756 or Robert.Kahler@nrc.gov, if you have questions.

Sincerely,

/RA/

Kathryn M. Brock, Director
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

Enclosure:
NRC Review of the FEMA
Evaluation Report

SUBJECT: RE: WOLF CREEK GENERATING STATION AND COFFEY COUNTY ANS
CHANGE EVALUATION REPORT – INTEGRATION OF IPAWS

DATED: December 17, 2019

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M. Casey, FEMA
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ADAMS Accession No. ML19325E216

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12/04/2019	12/05/2019	12/17/2019

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The U.S. Nuclear Regulatory Commission (NRC) Review of the FEMA Evaluation Report of the updated Wolf Creek Generating Station (WCGS) and Coffey County Integrated Public Alert and Warning Systems (IPAWS) Design Report and Alert and Notification Systems (ANS), August 6, 2019

The NRC review focused on whether the changes to the WCGS ANS enabled NRC to make a finding of reasonable assurance for the public health and safety based on the applicable requirements in 10 CFR 50, Appendix E, Section IV.D.3. The following is the result of the NRC staff's review.

Section IV.D.3, states, in part:

"...each nuclear power reactor licensee shall demonstrate that administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway EPZ. The design objective of the prompt public alert and notification system shall be to have the capability to essentially complete the initial alerting and initiate notification of the public within the plume exposure pathway EPZ within about 15 minutes."

- FEMA reports that IPAWS is capable of prompt public alert and notification within 15 minutes and a reliability of 94 percent or greater. The WCGS design report identifies that the IPAWS-compliant aggregator used to perform Coffey County Public Notification has a 99.99 percent availability. In addition, the Coffey County internet provider has an availability/reliability rate of 99.9996 percent. The NRC agrees with the FEMA finding that WCGS and Coffey County IPAWS Design Report provides for this requirement.

"The use of this alerting and notification capability will range from immediate alerting and notification of the public (within 15 minutes of the time that State and local officials are notified that a situation exists requiring urgent action) to the more likely events where there is substantial time available for the appropriate governmental authorities to make a judgment whether or not to activate the public alert and notification system."

- The NRC agrees with the FEMA finding that the WCGS and Coffey County IPAWS Design Report provides for this requirement.

"The alerting and notification capability shall additionally include administrative and physical means for a backup method of public alerting and notification capable of being used in the event the primary method of alerting and notification is unavailable during an emergency to alert or notify all or portions of the plume exposure pathway EPZ population. The backup method shall have the capability to alert and notify the public within the plume exposure pathway EPZ but does not need to meet the 15-minute design objective for the primary prompt public alert and notification system."

- Route alerting has been identified as the independent back-up alerting method for Coffey County. The design report states that route alerting can reasonably be expected to be completed within a target time of 45 minutes. The NRC staff agrees with the FEMA finding that the WCGS and Coffey County IPAWS Design Report provides for this requirement.

"The responsibility for activating such a public alert and notification system shall remain with the appropriate governmental authorities."

- Per the WCGS Design Report, The Coffey County Emergency Management Director has responsibility for, and authority to use IPAWS/WEA and IPAWS/EAS and the Coffey County Public Notification System. The NRC agrees with the FEMA finding that the WCGS and Coffey County IPAWS Design Report provides for this requirement.