VALUE-IMPACT ASSESSMENT ON GUIDANCE TO
APPLICANTS RELATIVE TO EMERGENCY PLANNING
REQUIREMENTS FOR RESEARCH REACTORS

I. The Proposed Action

A. Description

1. To issue a regulatory guide that gives specifc guidelines for the development and use of emergency plans for research reactors, and associated training of personnel.

B. Need for the Proposed Action

1. Applications for research reactor operating licenses received since December 1970 have frequently lacked sufficient information for adequate review by the NRC staff. Staff usually needs to request additional information, sometimes more than once which results in unnecessary delays.

2. Most research reactor licensees received their OL prior to December 1970 and have not established nor submitted an emergency plan for NRC evaluation. This guide would provide these licensees with a basis for developing their emergency plans as the need arises.

3. Clear guidance, identifing elements that must be addressed in an acceptable emergency plan, is not available at the present time.

4. This guide will help establish a uniformity or standardization of licensee emergency plans.

C. Value-Impact of Proposed Action

1. NRC

a. Staff may spend more time early in review
b. Staff will spend less time later in review
c. Estimate less staff time required in total
d. Staff will spend considerable time evaluating emergency plans submitted by licensees who did not have an emergency plan prior to the publication of the proposed guide.
e. This regulatory guide was requested by NRR and I&E. A copy of the formal NRR request is attached.

2. Other Government Agencies

The guide suggests that licensees make cooperative agreements and arrangements with State and local governments.

3. Industry or Universities

a. Applicants will spend less time in developing their emergency plan because they will know in the beginning what the staff needs for an adequate review.

b. Licensees who do not have an emergency plan will spend a considerable amount of time developing and maintaining an emergency plan in accordance with the proposed regulatory guide.

c. Applications will benefit from accelerated review time.

d. There will be an overall improvement in the quality of emergency plans with a potential increase in the level of public safety.

4. Public

a. The proposed guide would establish uniform guidelines for research reactor's emergency plan thereby facilitating prompt and effective action to minimize the consequences of an emergency. This would result in a second ary effect of improving public relations.

D. NRC Statutory Authority

1. The overall statutory authority for the proposed action is vested with NRC by the Atomic Energy Act of 1954 (as amended).

2. The specific regulation covering the proposed action is 10 CFR Part 50.34(a)(10) and 10 CFR Part 50.34(b)(6)(v) which require that applicants have satisfactory plans for coping with emergencies. Appendix E to 10 CFR Part 50 sets forth items to be included in the emergency plans, which have not to date been implemented uniformly for research reactors.

E. Need for NEPA Assessment

1. This assessment, and internal reviews, indicate that the proposed action:

a. is not a major action that will significantly affect the quality of the human environment, and

b. is not now, and is not likely to be, controversial.

2. On the basis of this conclusion, a NEPA environmental impact statement is not required.

F. Decision on Proposed Action

1. It is judged that adverse impacts are more than offset by favorable impacts and values. Therefore, the proposed action should be implemented.

II. Alternative Methods of Accomplishing Action

A. Alternatives

1. NRC regulation

2. ANSI Standard, endorsed by a Regulatory Guide

3. NUREG

4. Branch Position

5. Regulatory Guide

B. Value-Impact of Alternatives

1. NRC regulation

a. The basic elements that should be in an emergency plan are already a part of the regulations, Appendix E to 10 CFR Part 50. These basic elements now need amplification.

b. A new regulation would not cover the licensing requirements in the necessary detail.

c. Would require more time and effort than a Regulatory Guide.

d. Would legally require conformance.

e. Staff has successfully convinced applicants to conform to Regulatory Guides

f. Great difficulty in making changes.

2. Endorsed ANSI Standard

a. The ANSI standard that is now being developed to cover this subject (ANS 15.16) is considered by the staff to be inadequate and therefore will not be endorsed.

3. NUREG

a. NUREGs are informational and cannot contain staff positions.

b. A NUREG document would be inappropriate because the proposed Regulatory Guide would take a position for complying with the Commission's regulations with regard to the content of emergency plans for research reactors.

4. Branch Positions

a. Considered to be a temporary measure until action is accomplished by another alternative (Regulatory Guide).

b. Branch positions have limited distribution.

5. Regulatory Guide

a. Can be published for public comment and be effective in about one year.

b. Less time and effort required than for a new ANSI standard to be developed and endorsed.

c. Less time and effort required than for NRC regulation.

C. Decision on Method

A Regulatory Guide is the preferred method of accomplishing the action.

III. Relationship to Other Existing or Proposed Regulations or Policies

A. Guide will use Appendix E to 10 CFR Part 50 as a basis.

B. Backfitting should be required.

IV. Summary and conclusions

A. A Regulatory Guide on Emergency Planning Requirements for Research Reactors should be issued.