

Emergency Preparedness Frequently Asked Question (EPFAQ)

EPFAQ Number: 2020-02 **Date Accepted for Review:** 01/28/2020

Originator: David Young

Organization: Nuclear Energy Institute (NEI)

Relevant Guidance: 1. NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities"
2. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide"

Applicable Section(s): Various

Status: Complete

QUESTION OR COMMENT:

Background

In a letter dated March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) requested information from licensees associated with Near-Term Task Force recommendation 9.3 for emergency preparedness communications; the request was made pursuant to the agency's authority provided in Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(f)¹. The letter requested licensees to submit an assessment of their current communications systems and equipment used during a beyond-design-basis natural event resulting in an Extended Loss of AC Power (ELAP) to all on-site units and impeding access to the site. The § 50.54(f) letter cited § 50.47(b)(6) and 10 CFR Part 50, Appendix E, Section IV.E.9 as the applicable regulations that describe the licensee's emergency plan communications systems requirements. Licensees understood that the communications systems used to meet these regulations were the communications systems that were to be considered in the requested assessment. However, the intent of the communications assessment was to determine what, if any, enhancements would be needed to ensure the continued availability of onsite and offsite communications systems used to support required mitigative response actions during an ELAP.

Question

What is the relationship between the requirements in 10 CFR 50, Appendix E, applicable to emergency plan communications systems, and the enhanced communications capabilities (systems and equipment) installed by licensees to support required mitigative response actions during an ELAP?

PROPOSED SOLUTION:

A communication capability enhancement made by a licensee in response to the § 50.54(f) letter assessment need not meet the design capabilities for a communications system required by 10 CFR Part 50, Appendix E, or the testing frequencies described for primary and backup

¹ Refer to NRC letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident;" ADAMS ML12053A340.

Emergency Preparedness Frequently Asked Question (EPFAQ)

onsite and offsite communications systems. Equipment enhancements made as a result of this assessment were not necessary to meet the requirement to notify offsite response organizations within 15 minutes of an emergency declaration, or to meet the monthly communications testing requirement for State and local governments within the 10-mile emergency planning zone.

NRC RESPONSE:

In a letter dated March 12, 2012, "Request for Information Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," the NRC requested an assessment of their current communications systems and equipment used during emergencies and consideration of enhancements to their site-specific emergency plans with respect to communications equipment.

The requirements of 10 CFR 50.47(b) and Section IV. of Appendix E to 10 CFR Part 50 apply to site-specific emergency plans. As such, a licensee that changes its site-specific emergency plan regarding communications systems and equipment used during site-specific emergencies must comply with 10 CFR 50.54(q), which requires that the emergency plan meet the requirements of 10 CFR 50.47(b) and Section IV. of Appendix E to 10 CFR Part 50. Changes made to communications systems and equipment used during emergencies that do not result in a change to a site-specific emergency plan are not subject to the requirements of requirements of 10 CFR 50.47(b) and Section IV. of Appendix E to 10 CFR Part 50.

RECOMMENDED FUTURE ACTION(S):

- INFORMATION ONLY, MAINTAIN EPFAQ
- UPDATE GUIDANCE DURING NEXT REVISION

Emergency Preparedness Frequently Asked Question (EPFAQ)

ADAMS Accession No. ML20206K985

OFFICE	NSIR/DPR/RLB	NSIR/DPR/POB: BC	NSIR/DPR/RLB: BC
NAME	R. Hoffman	R. Kahler (by email)	J. D. Anderson (by email)
DATE	07/24/2020	07/30/2020	08/03/2020
OFFICE	OGC	NSIR/DPR:DD	NSIR/DPR/RLB
NAME	H. Benowitz (by email)	K. Brock (by email)	R. Hoffman
DATE	08/11/2020	08/17/2020	08/17/2020

OFFICIAL AGENCY RECORD