Completed Preparations for Incident Response Program Transition

The following items have been completed providing reasonable assurance that the U.S. Nuclear Regulatory Commission (NRC) is ready to transition to the revised Incident Response (IR) Program as designed under the Incident Response Reorganization Program (IRRP).

- 1) Responders have been qualified in their new response positions as part of the new program using the Incident Response Oversight Committee (IROC) approved transition qualifications.
- 2) Minimum qualification staffing criteria was created by the IRRP working group and approved by the IROC to specify the minimum number of responders by position and location. The IROC has verified that the criteria are met for all response positions.
- 3) Tabletop exercises were performed jointly between each region and headquarters demonstrating the effectiveness of the new program and the ability for responders to effectively respond using the new procedures and processes. An after-action report for incident response reorganization project tabletop exercise(s) was issued on September 29, 2020, and is available at Agencywide Documents Access and Management System (ADAMS) Accession No: ML20273A149.
- 4) Proof-of-concept functional exercises were conducted by each regional office in coordination with licensees' exercises between August and October 2020. These satisfactorily demonstrated the effectiveness of the new program. After-action reports were also documented for each of these exercises and will be uploaded to ADAMS in the next week.
- 5) Planned IR program changes were communicated to external stakeholders and the transition should be of no impact and transparent to these stakeholders
- 6) The IROC determined that it was beneficial to transition the IR program prior to the completion of several tasks. This allows the NRC to benefit from the improvements in the new program, while finishing tasks that would represent enhancements to the current program. These tasks are captured in the IR corrective action program (CAP) for resolution by the IROC. Specifically, these tasks are:
 - a. Finalizing Management Directive (MD) 8.2, "NRC Incident Response Program."
 - i. The MD is in interoffice concurrence and cannot be issued prior to program changes. Final concurrence and approval are expected soon after program transition.
 - b. Finalizing Incident Response Manual Chapter 200, "Incident Response Plan."
 - c. Issuing the final qualification program.
 - d. Finalizing the following procedures:
 - i. Senior Leadership
 - ii. Materials Response
 - iii. Non-Power Reactor Response

7) Additional procedure and process issues that have been identified during the training and exercises have either been addressed or have been assessed by the IROC as non-critical and have been captured in the IR CAP for future resolution.