

NRC PRESENTATION SLIDE ON NEI WHITE PAPER - ERO
NRC PUBLIC MEETING, JUNE 14, 2022 (ADAMS ML22158A266)

NEI requested NRC staff feedback on Draft C of NEI White Paper, "Enabling a Remote Response by Members of an Emergency Response Organization" (ADAMS ML21193A345).

On December 15, 2021, the NRC staff conducted a public meeting providing comments on Draft C of the NEI White Paper. In response to NRC staff comments, NEI prepared Draft D of the White Paper and submitted Draft D to the NRC on March 22, 2022, (ADAMS ML22117A179).

The NRC staff has reviewed Draft D of the White Paper and determined that the current version provides a general overview of areas of consideration. The NRC staff has the following comments/questions:

1. How will drills and exercises be controlled and evaluated for remote responders?
2. For remote responders within the EPZ, how will evacuations be handled if the remote responder must evacuate?
3. The remote ERO augmentation White Paper indicates that individuals performing physical work and providing direction for the OSC, TSC, and EOF are required to respond to the site if augmentation is required by site-specific emergency plans.
 - a. The white paper does not provide guidance regarding any additional ERO positions. This could imply that all positions other than facility directors and individuals perform physical work could be filled remotely.
4. Draft D of the White Paper appears to eliminate several NRC staff concerns identified at the December 15, 2021, NRC public meeting with NEI/Industry by revising the White Paper to remove details and information rather than providing a specific response to NRC staff comments. Examples are as follows:
 - a. Draft D of the White Paper removed specific ERO positions as candidates for remote augmentation. Draft D states that ERO staff who are required to perform physical work and individuals responsible for overall command and control are not candidates for remote response and should respond to their designated emergency response facilities. This wording does not address several NRC staff comments regarding specific positions that may be considered for remote augmentation.
 - b. Draft C of the White Paper stated that a specific ERO position will be a candidate for remote response only if it can be shown that all functions can be adequately performed. The NRC staff asked, "How will it be shown that a remote responder can adequately fulfill all applicable ERO functions?" and "Will this white paper provide a method to demonstrate the capability for remote responders to fulfill all applicable ERO functions?" Draft D does not specifically address either of the above NRC staff questions.
 - c. Considering that remote response will not provide the same communications options and capabilities as in-center response, it is not clear to the NRC staff how there will be no reduction in effectiveness of the ERO to respond to an emergency. Draft D provides guidance that an activity is expected to be performed to validate that remote response can be successfully implemented. Draft D further provides that this activity and documentation of the validation should be referenced as supporting the conclusion that there would be no reduction in effectiveness of the emergency plan. Without additional detail, the NRC staff could not determine how Draft D of the White Paper could be used to validate that remote response can be successfully implemented.