



FEMA

March 24, 2023

Mr. Jesse Quichocho
Reactors Licensing Branch
Division of Preparedness and Response
Office of the Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

SUBJECT: FEDERAL EMERGENCY MANAGEMENT AGENCY REVIEW REQUESTED OF
REVISION TO THE NEXTERA SITE EMERGENCY PLANS

Dear Mr. Quichocho:

The FEMA Radiological Emergency Preparedness (REP) Program received your letter dated April 13, 2023, requesting FEMA's review of the proposed NextEra site emergency plan changes to verify that no potential adverse impacts exist that would preclude the effective implementation of the existing FEMA-approved state and local offsite radiological emergency response plans and procedures. The proposed changes to the NextEra Emergency Plan may affect the emergency plans for the states of Massachusetts, New Hampshire, Florida, and Michigan.

FEMA Regions 1, 4, 5, and Headquarters REP staff reviewed the proposed NextEra emergency plan changes against the current FEMA approved States of Massachusetts, New Hampshire, Florida, and Michigan and local municipalities REP plans. FEMA is requesting that the NRC provide additional information on the enclosed questions. Until this additional information is provided, FEMA cannot conclusively make a determination that reasonable assurance exists in the communities in the vicinity of the NextEra fleet of commercial nuclear plants.

Page 2
March 24, 2023

If you have any questions or concerns, please contact me at craig.fiore@fema.dhs.gov or (202)280-9303 or Timothy Harris III at timothy.harrisIII@fema.dhs.gov or (202)765-6727.

Sincerely,

A handwritten signature in black ink that reads "Craig J. Fiore". The signature is written in a cursive, flowing style.

Craig Fiore
Acting Branch Chief
Radiological Emergency Preparedness Program
Technological Hazards Division

Enclosure: Proposed questions

Cc: Ingrid Peirce, RAC Chair, Region 1
Kevin Wells, RAC Chair, Region 4
Sean OLeary, RAC Chair, Region 5

Questions From FEMA Technological Hazards Division

- **[Potential RIE 2-3] ORO Communicator at 90 Minutes:** This change proposes that initial notification to the ORO using an electronic system that contacts the ORO warning points and emergency management staff via email, text and verbal computer-generated voice communications eliminates the need for a communicator to perform the verbal portion of the initial notification. The forms used are negotiated and approved with OROs to provide information needed to make initial response decisions which would result in minimal need for OROs to request additional information. The change proposes that if additional information is needed, the ORO may call the control room. What provisions have been made to assure that control room staff will have time to take a call on notification message questions while working an emergency?
- **[Potential RIE 6-2] Reduced Hospital and Ambulance Drill Participation and Periodicity:** This change proposes that Emergency Medical Drill offsite participation and periodicity for support Hospital and Ambulance services are performed in accordance with the 42 CFR 482.15 regulations. Hospitals are accredited by The Joint Commission in compliance with 42 CFR 482.15, which does not meet the minimum demonstration requirements for the ORO medical services drill. Joint Commission requirements for accreditation rules change frequently based on membership concerns. The Joint Commission currently does not have requirements for CBRN related exercise. How will the ORO meet the demonstration standards for the FEMA REP Program assessment if only following Joint Commission standards?
- **[Potential RIE 7-1] Added Allowance for Remote Response of Engineering and Dose Assessment Function:** This change proposes the use of remote dose assessment. Provisions are outlined to address how the dose assessor will access information and provide information to members or the ERO, but not with OROs. There is a high level of coordination and information sharing between licensee dose assessors and ORO dose assessors. ORO dose assessors rely on the licensee dose assessor for information on plant conditions. In addition, OROs compare the results of their dose assessments to licensee dose assessments to assure results are consistent within a factor of 10. What provisions are there for the coordination amongst the licensee dose assessor and ORO dose assessor? Will remote dose assessment be demonstrated during the biennial evaluated exercise?