

POLICY ISSUE
NOTATION VOTE

RESPONSE SHEET

TO: Brooke P. Clark, Secretary
FROM: Commissioner Crowell
SUBJECT: SECY-23-0010: Recommendation for Approval to Retire the Reactor Oversight Process Performance Indicator for Licensee Alert and Notification System Availability and to Develop a Performance Indicator for Emergency Response Facility and Equipment Readiness Availability

Approved X Disapproved Abstain Not Participating

COMMENTS: Below Attached X None

Entered in STAR

Yes X

No

Signature

Commissioner Crowell's Comments on SECY-23-0010
"Recommendation for Approval to Retire the Reactor Oversight Process
Performance Indicator for Licensee Alert and Notification System Availability
and to Develop a Performance Indicator for Emergency Response Facility
and Equipment Readiness Availability"

In its paper, the staff requested Commission approval to retire the Reactor Oversight Process alert and notification system (ANS) performance indicator (PI) and to implement an emergency response facility and equipment readiness (ERFER) PI as an alternative means to measure the effectiveness of licensee emergency preparedness staff maintenance activities.

The proposed change will measure the effectiveness of maintenance activities by the growing number of sites replacing fixed offsite siren systems with the integrated public alert and warning system (IPAWS) as the *primary* method to accomplish notification of the public during a radiological emergency.

The NRC requires power reactor licensees to demonstrate that offsite response organizations have public alert and notification capability, and that this capability reflects the potentially unique needs of the communities within the required emergency planning zone of a given reactor site. Currently, most sites use a siren system as the primary alerting method, with Emergency Alert Messaging (EAS, TV, and radio) as the primary notification methods to provide additional information. The Federal Emergency Management Agency (FEMA) has adopted an IPAWS as its national system for local alerting and notification that provides authenticated emergency and life-saving information to the public through mobile phones using wireless emergency alerts, radio, and television via the emergency alert system. FEMA anticipates that many or most offsite response organizations will adopt an IPAWS as their primary ANS, therefore impacting licensees' ability to report ANS availability via a performance indicator. Consequently, with widespread implementation of IPAWS, the ANS PI will eventually have increasingly limited data specific only to a small subset of reactor sites that are in States that choose not to implement IPAWS and will continue to use sirens as their primary public alerting method. Regardless the NRC will continue to maintain oversight of the ANS through inspection in the Reactor Oversight Process. The NRC recognizes the importance of maintaining an appropriate level of oversight of ANS for adequate protection of all communities such as tribal nations that may have limited or no access to technologies utilized by IPAWS, or communities of faith whose cultural practices may not allow for use of communications technologies covered by the IPAWS.

I approve the staff's recommendation for Option 3 to retire the Alert Notification System as a Performance Indicator and implement an ERFER PI, while maintaining effective oversight of a well-functioning ANS through the Reactor Oversight Process to ensure adequate protection of all communities within the notification parameter of a given reactor site.