

From: [Don Johnson](#)
To: [Sean Hedger](#)
Cc: [Ryan Alexander](#); [Nestor Makris](#); [Lee Moore](#); [Cindy Rosales-Cooper](#); [Dwayne Myal](#)
Subject: RE: Discussion with IPAWS Audit Expectations
Date: Tuesday, April 15, 2025 3:47:57 PM

Hi Sean.

Given the recurring issues FEMA THD are having with the EO responses and workload I would suggest that you document within the inspection report that licensee responsibility for the IPAWS audit is being addressed by NSIR and FEMA THD, timing TBD. Pending this meeting with FEMA, I would state that the requirement for licensee audits of IPAWS, and the subsequent NRC oversight of that per 71114.02, is on-hold, i.e., not required by the licensee and therefore not part of our oversight. If this changes we will reach out to you, but I believe we can document this unnecessary part of the ANS Design Report and note that the performance of this audit has no effect on our (NRC) reasonable assurance position. Feel free to document that this is per Program Office direction (NSIR/DPR/POB). Let me know if you need anything else to close this issue for Wolf Creek. We are pausing any upcoming ANS Design Report approvals that have this requirement in it, and after our FEMA-NRC meeting we may correct the ANS Design Reports that went out with this in them, and/or provide documented (public) guidance on what an audit entails. I personally believe this should be a requirement of the OROs, not the licensee, but we will see what happens after our discussions.

Thanks.

DJ

Don A. Johnson

**Senior Emergency Preparedness Specialist
Policy and Oversight Branch
Division of Preparedness and Response
Office of Nuclear Security & Incident Response
U.S. Nuclear Regulatory Commission
11545 Rockville Pike
Rockville, MD 20852**

**E-mail: don.johnson@nrc.gov
Phone: (301) 287-9230**

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From: Sean Hedger <Sean.Hedger@nrc.gov>
Sent: Tuesday, April 15, 2025 10:24 AM
To: Don Johnson <Don.Johnson@nrc.gov>

Cc: Ryan Alexander <Ryan.Alexander@nrc.gov>; Nestor Makris <Nestor.Makris@nrc.gov>; Lee Moore <Lee.Moore@nrc.gov>; Cindy Rosales-Cooper <Cindy.Rosales-Cooper@nrc.gov>
Subject: RE: Discussion with IPAWS Audit Expectations

Don,

I wanted to check in with you to get your feedback on this approach.

We will be assessing the associated FEMA/NRC communications versus the Wolf Creek issue to address the URI this quarter. Without having a public standard on what the licensee audit should address, and with the internal communications non-public, it could make proposing some form of performance deficiency challenging. Therefore, any input that can be solicited would be appreciated.

Thank you,

Sean D. Hedger
Senior Emergency Preparedness Inspector
US Nuclear Regulatory Commission, Region IV
(817)200-1556

From: Sean Hedger
Sent: Wednesday, March 26, 2025 2:22 PM
To: Don Johnson <Don.Johnson@nrc.gov>
Cc: Ryan Alexander <Ryan.Alexander@nrc.gov>; Nestor Makris <Nestor.Makris@nrc.gov>; Lee Moore <Lee.Moore@nrc.gov>; Cindy Rosales-Cooper <Cindy.Rosales-Cooper@nrc.gov>
Subject: Discussion with IPAWS Audit Expectations

Don,

Based on our discussions yesterday, we have the perception that you have a means via conversation with FEMA representatives to address the expectations for the IPAWS audit process. Given the volume and weightiness of some of the licensing/funding/Executive Order topics we're discussing in the IPR, I can lessen my emphasis on desired need for standards in this venue. Tomorrow, I can acknowledge their recent assistance with the Wolf Creek issue, and mention we look forward to developing better understanding of this process as more sites are adopting IPAWS. However, we may need additional assistance on the Wolf Creek issue in some form this next quarter (when we have resources to address the inspection URI). If you think we can get this assistance through NSIR and these FEMA contacts during that time, I will not make such an emphasis on this tomorrow.

If they ask me for more on this tomorrow, I'll try to point to the dialogue methods you have mentioned we have working on this topic.

If you have any issues with this, or another recommended approach, let me know. Thank you,

Sean D. Hedger

Senior Emergency Preparedness Inspector

US Nuclear Regulatory Commission, Region IV

(817)200-1556