

Discussion of 50.54(f) Letter for Recommendation 9.3

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NEI
and Industry Representatives

50.54(f) Letter – Enclosure 6

- Agree with approach of using 50.54(f) to gather detailed information to inform future rulemaking or guidance
- Industry comments provided in public meeting on 1/19/12 and NEI letter dated 1/25/12
- Changes reflected in current draft of EP information request are constructive

Assessment Assumptions

- Offsite communications infrastructure
 - 25 miles
 - Site-specific value with a basis
- Site access limitations
 - Time frames determined after review of 7 natural phenomena events that resulted in significant and wide-spread damage. The reviewed events included earthquakes, hurricanes and tornados.

Site Access Limitations

- The natural phenomena events that potentially have the most impact on site access are those associated with large severe storm systems (e.g., a hurricane). This impact is mitigated by the fact that augmented ERO personnel and response equipment can be staged at on or near-site locations prior to storm arrival. In addition, as a result of their storm tracking, preparation and response activities, offsite agencies are in a position to provide special transportation-related resources to facilitate site access if necessary.

Site Access Limitations

- While earthquakes and tornadoes did present some challenges to the mobilization or deployment of response personnel (e.g., police and firefighters), actions were not significantly delayed.
- The Fukushima “data point” of 9 hours is not informed by a known request or movement start time, or the route taken.

Site Access Limitations

- Post event time: 0 to 4 hours
 - No site access
 - This duration reflects the time necessary to clear roadway obstructions, use alternate routes, mobilize alternate transportation capabilities, etc.

Site Access Limitations

- Post event time: 4 to 24 hours
 - Limited site access
 - The site may be accessed by walking, a helicopter, personal vehicle or small boat

Site Access Limitations

- Post event time: 24+ hours
 - Unlimited access
 - Site access is restored to a near-normal status and/or augmented transportation resources are available to deliver heavy or large loads

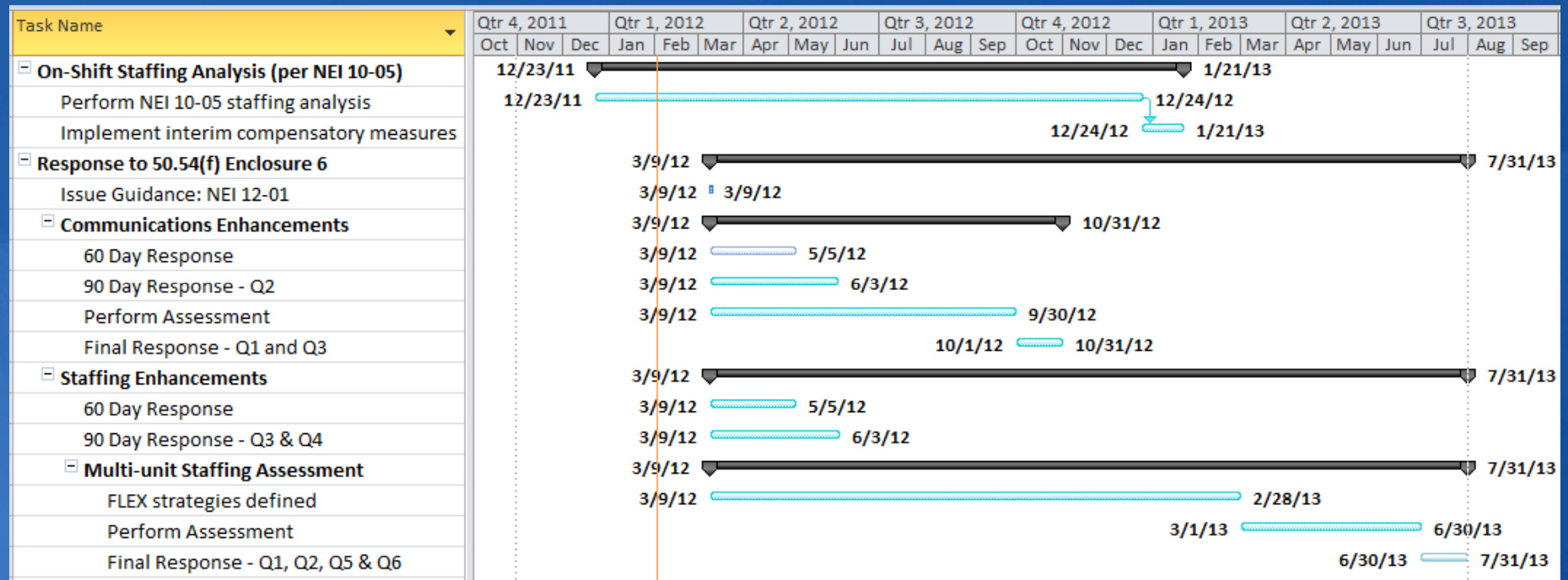
Industry Response

- Developing NEI 12-01, *Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities*
 - Seeking staff endorsement
- Developing a standard information request response template
 - Allow necessary time for assessments

Assessments Impacts

- There are several NTTF-related activities underway that impact the assessments
 - Enhancement for loss of AC power
 - FLEX coping capabilities
 - Procedure integration/SAM improvements
- Activity timelines are not aligned
- Time needed to define new response activities before performing assessments

Response Schedule



50.54(f) Response

- Questions from industry?
 - Communications
 - Staffing