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NRC Commission Briefing

Emergency Preparedness Rulemaking

Tom Joyce
President & Chief Nuclear Officer
PSEG

Industry Concerns with Rulemaking

- Deviation from the structured regulatory process
- New regulations without sound basis

Deviation From the Structured Regulatory Process

- Evolving requirements in advance of final rulemaking in the form of:
 - Regulatory Issue Summary (RIS) 2005-02, Clarifying the Process for Making Emergency Plan Changes
 - Draft NRC Interim Staff Guidance (ISG-01), Emergency Planning for Nuclear Power Plants
- Disposition of Stakeholder (or Public) Comments
- Implementation

Proposed Regulations Without Basis

- Licensee Coordination with Offsite Response Organizations
 - Requirement for licensees to ensure that offsite response personnel....would be available during hostile action events.
- Challenging Drills and Exercises
 - Exercise Planning Cycle
 - Hostile Action Based Exercises & Radiological Releases
- On-shift Multiple Responsibilities

Closing

- Industry not adverse to enhancements
- Transparency in NRC's Rulemaking Process
- Committed to continuous improvement; however, oppose departure from the established regulatory process and proposed regulations without basis