

North Carolina Review of NRC Proposed Rulemaking

December 8, 2009

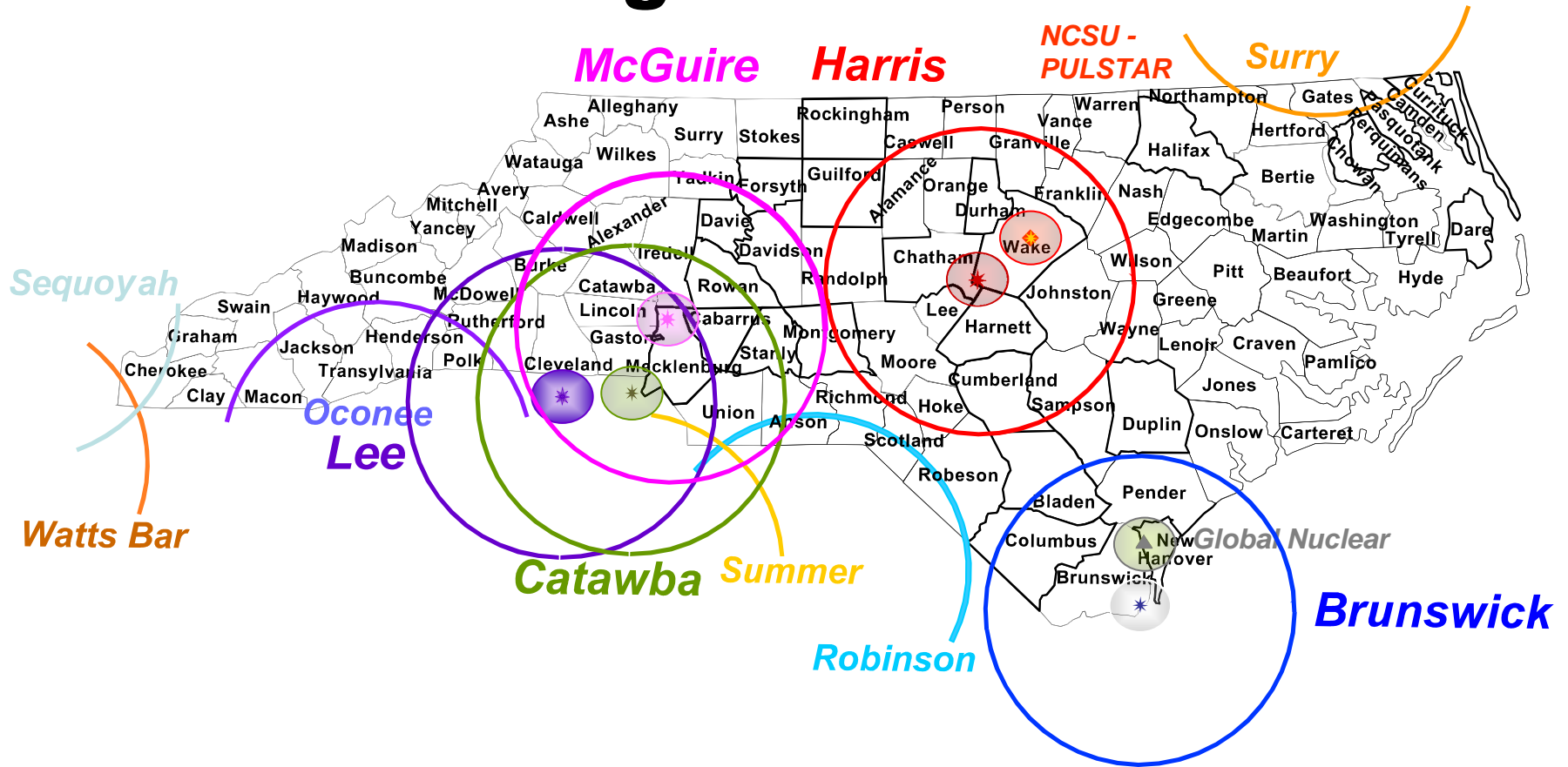
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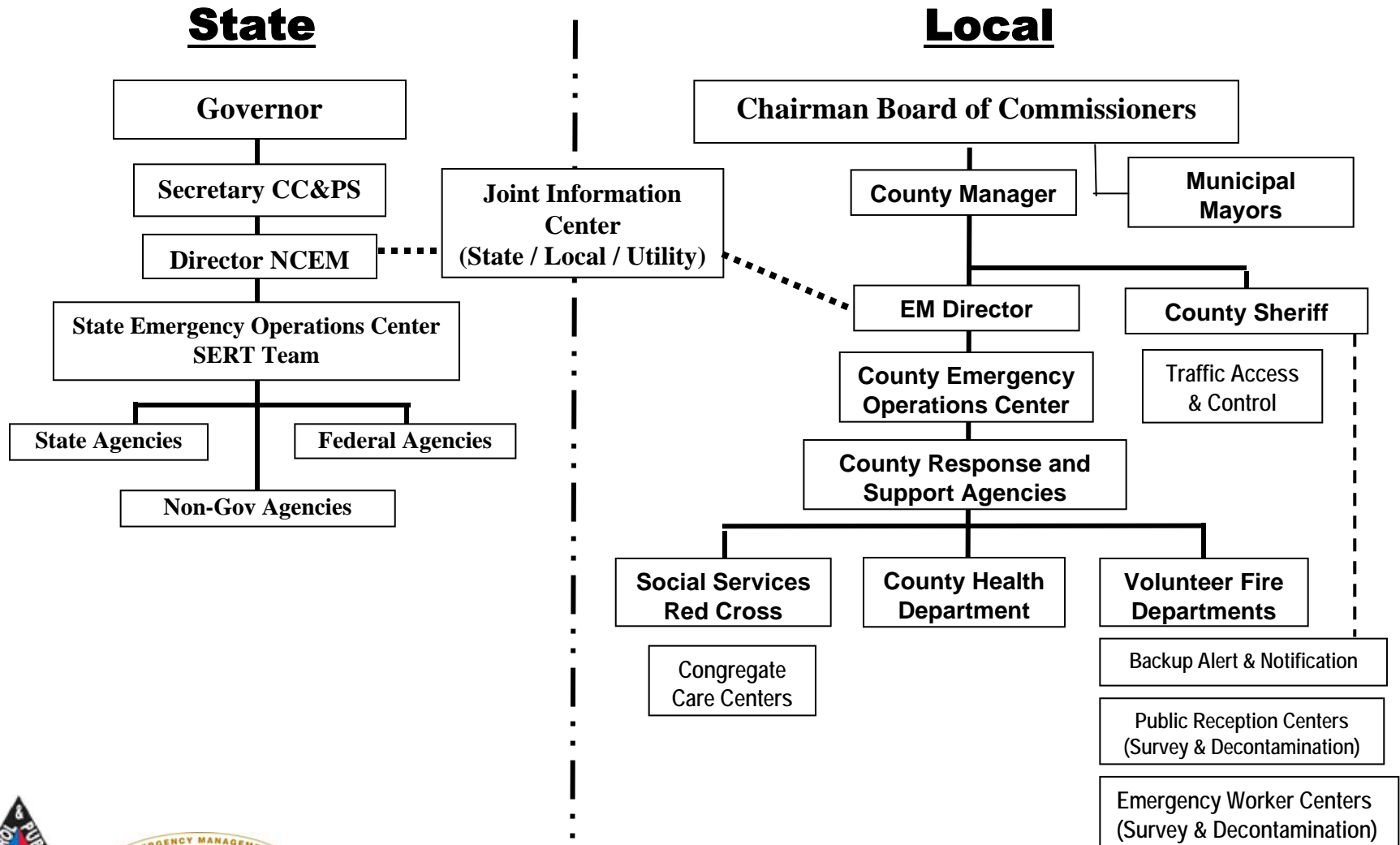
**North Carolina Division of Emergency
Management**



Nuclear Facility Locations Effecting North Carolina



North Carolina Response Structure



REP Task Force Organizations

(Example: Brunswick NPP TF)

- ♦North Carolina Division of Emergency Management
- ♦Brunswick County Emergency Management
- ♦New Hanover County Emergency Management
- ♦North Carolina Division of Radiation Protection
- ♦North Carolina Highway Patrol
- ♦North Carolina Marine Patrol
- ♦North Carolina Wildlife Resources Commission
- ♦Nuclear Power Plant Representatives
- ♦Federal Emergency Management Agency (FEMA)
- ♦United States Coast Guard (USCG)
- ♦National Weather Service (NWS)



Emergency Preparedness Regulation Enhancements

- **Beyond the scope of US Code of Federal Regulations or NRC/FEMA MOU document**
- **Extend NRC's influence beyond that of regulating the nuclear power industry**



Licensee Coordination with **ORO's**

- **How does the licensee ensure the ORO has sufficient personnel “available for a hostile action event.”?**
- **Under what authority does NRC have to verify ORO documentation?**



10 CFR Part 50, Appendix E, **Section IV.A.7.**

- **How does the licensee determine what is an adequate response?**
- **What action is the licensee to take? Under what authority?**



Summary

- **Especially high level of concern and disapproval for these recommended actions**
- **Do not support acceptance of Sec 4., Licensee/ORO Coordination or 10 CFR Part 50, Appendix E, Section IV.A.7 as written**
- **Highly recommend NRC totally delete these requirements**

