

Industry Perspective on EP Rule

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Positive Aspects of the Process

- **Draft rule guidance provided for comment well in advance of implementation**
- **Public meetings conducted to gather stakeholder input**
- **Incorporation of review comments and input improved the guidance**
- **New rule will improve several elements of EP programs**

Areas of Concern

- **Changes that are not adequately justified or do not have benefits commensurate with resources required to implement**
 - **Drills and exercises, backup alert and notification system, evacuation time estimates, and emergency plan change process**
 - **Some elements of each lack a sound technical basis or are inconsistent with Principles of Good Regulation**

Areas of Concern

- **Guidance continues to evolve**
 - **On-shift collateral duty analysis**
 - **Task analyses should be required only for positions not already analyzed by other programs or processes**
 - **No additional formal comment period**

Going Forward

- **Finalize and issue staff guidance documents**
- **Timely staff review or endorsement of industry guidance documents**
- **Planned NRC/FEMA Workshops**
- **Implementation will be challenging for licensees and State/local agencies**