

# State Perspective on EP Rule

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# Positive Feedback on Process

- NRC was responsive to requests for an extended comment period
- Numerous Opportunities for stakeholder involvement
- Regional outreach and public meetings
- Comprehensive document summarizing public comments
- Stakeholder comments impacted Final Rule

# State Concerns

- Dual Impact of both NRC and FEMA rulemaking and guidance on state resources
- Events in Japan will require a comprehensive analysis of plant safety and design, emergency response plans and the application of lessons learned stretching limited resources
- Draft/Final FEMA guidance has not been released for review

# Federal Guidance Consistency

- Acceptance criteria for ANS systems is not currently available in any FEMA guidance
- NRC considering changes to NUREG-0654 Supplement 3
- FEMA proposed changes to NUREG-0654 Supplement 4
- NUREG-0654 initially issued as a joint document; need consistency

# Backup Alert and Notification System

- ISG-01 recommends that no PI credit should be give for the backup ANS system
- No metrics to measure its contribution to the ANS reliability PI.
- No Time requirement
- Question: If it has no effect on health and safety and no design criteria, why is it regulated? Is a change to the current system necessary?

# Exercise Schedule

- All offsite exercise objectives required by FEMA cannot be met during some of the suggested exercise scenarios.
- Off line and out-of-sequence exercises demand more time, resources and funding.
- Added burden on state, county and local response organizations.
- FEMA must be consistent and flexible in allowing states to meet these objectives with minimal impacts to staffs and funding.

# Future Rulemaking

- Supplement 3
- NUREG-0654
- Minimize impact/changes to recently adopted rules and guidance
- Recognize the resources and time required to implement current rule changes
- Continue to engage stakeholders early in the review process.