

August 1, 2014

The Honorable Harold Rogers  
Chairman, Committee on Appropriations  
United States House of Representatives  
Washington, DC 20515

Dear Chairman Rogers:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to the provision of the Joint Explanatory Statement in House Report 113-135 associated with Division D of Public Law 113-76, the "Consolidated Appropriations Act, 2014," which requires the NRC to submit recommendations for additional actions that should be included within the National Response Framework (NRF) to improve national capability to respond in the aftermath of a significant natural event that impacts operating nuclear power plants. In brief, the NRC actively supports the NRF and believes that the interagency efforts to update its implementing guidance continue to provide an effective response capability. There are no additional activities or NRF enhancements that the NRC would recommend at this time.

The NRC finds that the 2013 NRF provides a robust and flexible approach to how the nation responds to all types of disasters and emergencies, including those affecting nuclear facilities that the NRC regulates. The NRF effectively aligns key roles and responsibilities for communication and response. The NRC is an active participant in the interagency response community. The NRC has helped develop key NRF documents and participates in exercises of the NRF and the associated Federal Interagency Operational Plans.

The key implementing procedure for the NRF, as it relates to radiological and nuclear events, is the Nuclear Radiological Incident Annex (NRIA). In an effort to build more robust communication with the "whole community" of responders, the Federal Emergency Management Agency (FEMA), with the NRC, the Federal Bureau of Investigation, the U.S. Department of Energy (DOE) and other agencies are coordinating efforts to revise the NRIA as a robust operational incident annex to the Federal Interagency Operations Plans for the Response and Recovery mission areas. The planning is being performed with the Federal Radiological Preparedness Coordination Committee Response sub-committee, and the Emergency and Recovery Support Function Leadership Groups. This annex to the Response and Recovery Federal Interagency Operating Plans under the NRF will address nuclear and radiological incidents, including those involving nuclear power plants, caused by natural events, accidents, and intentional acts. In addition, the revision will update the document to reflect new response concepts from the revised NRF, as well as to incorporate lessons from Fukushima and other events. The NRC participates on the core planning team that is working on the revision. The majority of the revision will be completed in a collaborative manner not just with federal stakeholders, but with input and guidance from state, local, and non-governmental organizations and other relevant parties.

Notably, under NRC regulations, each NRC-licensed nuclear power plant conducts required, evaluated, biennial exercises with participation of state and local organizations and the

NRC. These exercises test NRC licensee, local and state government, and federal emergency plans and provide insights to the response envisioned under the NRF. The key roles, responsibilities, and communications links are regularly practiced during these frequent drills and exercises. The NRC is committed to continuous improvement and routinely conducts self-assessments and examines the lessons learned from both exercises and real incidents.

The NRC, along with FEMA, and the DOE, is sponsoring development of a full federal participation response and recovery exercise, planned for July of 2015 in South Carolina, centered on an event at an operating nuclear power plant. We expect this exercise will provide valuable insights to future development of the NRF and its implementing guidance that apply to nuclear power plants.

In a collaborative effort currently underway with FEMA, the NRC is updating a key document used by NRC licensees/applicants and state, local, and tribal entities in the development of emergency plans for nuclear power plants. The update to NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," will recognize the use of National Preparedness System concepts and resources as a conduit to the NRF. In addition, the update will encourage state, local, and tribal entities to incorporate the use of federal assets available through the NRF into their emergency plans to supplement overall response capabilities.

The NRC is also participating in the Environmental Protection Agency-led effort to update protective action guides (PAG), under the "PAG Manual: Protective Action Guides and Planning Guidance for Radiological Incidents." The PAG manual is a key support document for the NRF. The PAG manual updates will reflect new science, expand the document's relevancy to more than just nuclear power plants, and incorporate recent guidance on re-entry, cleanup, and waste disposal. The document was issued for public comment in 2013. The NRC is participating in an interagency group to evaluate the comments and finalize the guides.

The NRC believes the ongoing interagency efforts to conduct a full Federal participation nuclear power plant exercise, and to update the NRIA, NUREG-0654/FEMA-REP-1, and the PAG manual, represent a comprehensive approach to enhance the NRF as it applies to NRC-licensed activities. The NRC remains confident that there is reasonable assurance that an effective response capability exists for licensed activities that is protective of public health and safety and of the environment. The NRC appreciates the opportunity to comment on this matter.

If you need any additional information, please contact me or Amy Powell, Acting Director of the Office of Congressional Affairs, at (301) 415-1776.

Sincerely,

/RA/

Allison M. Macfarlane

cc: Representative Nita M. Lowey

**Identical letter sent to:**

The Honorable Harold Rogers  
Chairman, Committee on Appropriations  
United States House of Representatives  
Washington, DC 20515  
cc: Representative Nita M. Lowey

The Honorable Barbara A. Mikulski  
Chairman, Committee on Appropriations  
United States Senate  
Washington, DC 20510  
cc: Senator Richard C. Shelby