
INSPECTION MANUAL CHAPTER 1601

COMMUNICATION AND COORDINATION PROTOCOL FOR DETERMINING THE STATUS OF OFFSITE EMERGENCY PREPAREDNESS

Effective Date: **January 1, 2025**

1601-01 PURPOSE

To provide guidance for coordination between the NRC and the Federal Emergency Management Agency (FEMA) in determining the adequacy of offsite emergency plans and preparedness in response to a natural disaster or event. Such natural disasters or events might involve hurricanes, tornados, floods, severe storms, or earthquakes. The natural disaster or event is projected to occur or has occurred in the vicinity of an NRC-licensed nuclear power reactor facility and is expected to result or has resulted in significant damage to roads, buildings, communications, transportation resources, or other offsite infrastructure that potentially degrades the capabilities of offsite response organizations (OROs) to effectively implement appropriate protective actions for the general public in the facility's plume exposure pathway emergency planning zone.

1601-02 OBJECTIVES

- 02.01 Enable coordination and communication between FEMA and the NRC before, during, and after a **natural disaster or event** in assessing the status of offsite emergency preparedness (EP) capabilities as they relate to FEMA's determination of continued reasonable assurance that appropriate measures can and will be taken to protect the public health and safety in the event of a radiological emergency at an NRC-licensed nuclear power reactor facility.
- 02.02 Identify respective NRC office and **regional** responsibilities and authorities for:
 - 1) coordinating with FEMA in assessing the status of offsite infrastructure and response capabilities, 2) obtaining FEMA's determination as to continued reasonable assurance, and 3) evaluating the impact of FEMA's determination on NRC decisions regarding licensee restart activities or continued operation.

1601-03 DEFINITIONS

- 03.01 **Preliminary Capabilities Assessment (PCA):** Process used by FEMA to obtain a prompt assessment (situational report) of offsite EP immediately following a natural disaster or event to assist in the joint determination by the affected FEMA Region(s) and FEMA Headquarters Radiological Emergency Preparedness (REP) Program on the need and timing for a DIR.
- 03.02 **Disaster Initiated Review (DIR):** Process used by FEMA following a natural disaster or event to formally assess the offsite emergency response infrastructure conditions and capabilities to effectively implement approved offsite REP plans by State and local

authorities. A DIR is not intended to be a comprehensive review of offsite plans and preparedness.

1601-04 PROCESS

- 04.01 This **inspection** manual chapter (**IMC**) applies only to an NRC-licensed nuclear power reactor facility that requires formal offsite plans and preparedness in accordance with Section **50.54(q)** of Title **10** of the *Code of Federal Regulations (10 CFR)*, “**Emergency plans.**” It does not apply to fuel cycle facilities, independent spent fuel storage installations, research and test reactors, **certain** decommissioning power reactors, or other NRC-licensed facilities that do not require formal offsite radiological emergency preparedness.
- 04.02 FEMA will determine the need to perform a formal assessment following a natural disaster or event that FEMA determines has resulted in significant damage to offsite infrastructure and response capabilities in the vicinity of an NRC-licensed nuclear power reactor facility that would potentially preclude the ability to implement an appropriate protective action recommendation to the public. FEMA may choose to assess the impact on offsite infrastructure and EP capabilities by first performing a PCA, which may be conducted via conference call with impacted State(s) and local jurisdictions, prior to making a decision on whether a more detailed DIR is needed.
- 04.03 This procedure is intended to be used in coordination with the following procedures:
- FEMA’s Standard Operating Guide (SOG), entitled “Assessment of Offsite Emergency Preparedness Infrastructure and Capabilities Following an Incident in the Vicinity of a U.S. Nuclear Regulatory Commission Licensed- Nuclear Power Plant,” describes the FEMA processes used to assess the impact on offsite infrastructure and emergency response capabilities **and is available on the FEMA public website.**
 - NRC Incident Response Procedure (IRP) **204, Revision 2**, “Natural Phenomena.”
- 04.04 If FEMA’s initial assessment determines that the natural disaster or event has significantly impacted the vicinity around an NRC-licensed nuclear power reactor facility, FEMA may choose to conduct a PCA in coordination with the applicable NRC Region(s) and the appropriate State, **Tribal** and local response organizations. During the PCA, consideration will be given as to whether predetermined backup means are available, or measures have been established that can adequately compensate for the impacted offsite capabilities/functions. Communications and coordination during the PCA should be maintained at the **regional** level between the appropriate FEMA Regional Radiological Assistance Committee (RAC) Chairperson and NRC Regional State Liaison Officer (RSLO) **or Regional Government Liaison Officer (RGLO).**
- 04.05 FEMA Headquarters Technological Hazards Division (**THD**) **Director**, in consultation with affected FEMA **regional office(s)**, will have the sole responsibility for determining the need to initiate a DIR. **However, it is possible the executive branch direction could compel FEMA to take action.** FEMA Headquarters **THD Director** will communicate to the NRC Headquarters **Office of Nuclear Security and Incident Response (NSIR), Division of Preparedness and Response (DPR) Director** its decision on the need to conduct a DIR to reaffirm “continued reasonable assurance” **in writing, as soon as practicable.**

Note: FEMA's initiation of a DIR, if warranted, may be delayed based on the OROs' response in support and recovery activities.

1601-05 RESPONSIBILITIES AND AUTHORITIES

Specific guidance implementing the responsibilities for the positions listed below is provided in Section 07, "Guidance" of this IMC.

05.01 Regional State Liaison Officer(s)/Regional Government Liaison Officer(s)

- a. Serves as the primary NRC liaison at the regional level with the FEMA RAC chair and REP staff, and impacted State, Tribal, and local officials in the assessment of offsite infrastructure and response capabilities.
- b. Prior to FEMA determining the need for a PCA or DIR, serves as the NRC's primary point of contact for communication and coordination with FEMA via the RAC chair(s) on the status of offsite EP capabilities, which includes:
 1. Participate in periodic status calls with affected State(s), local counties/parishes and Tribal governments (as applicable) in collaboration with the FEMA RAC chair.
 2. Advise NRC Headquarters (NSIR/DPR), via the Reactor Licensing Branch (RLB) Chief, and regional management of the results from FEMA Region(s) immediate post-event assessment of offsite infrastructure and response capabilities, and proposed schedule for periodic FEMA status calls with affected State(s), local counties/parishes, and Tribal governments.
 3. Promptly inform the RLB Chief of FEMA's decision regarding whether to perform a PCA and, if so, its timing.

Note: As a goal, a PCA should occur 24-48 hours post-event to determine the status of offsite reasonable assurance and the need to perform a DIR.

- c. Keeps the applicable NRC regional administrator and NRC Headquarters staff apprised on matters associated with the development of a PCA and/or DIR.

05.02 Chief, Reactor Licensing Branch, Division of Preparedness and Response, Office of Nuclear Security and Incident Response

- a. Participates in coordination calls with RSLO(s)/RGLO(s) in the affected regions to maintain an awareness of FEMA's assessment of offsite infrastructure and response capabilities.
- b. Coordinates with the FEMA REP Programs Branch Chief on DIR assessment activities, including the prognosis for restoration of offsite infrastructure and response capabilities or implementation of interim compensatory measures, and on licensee plans for reactor restart.
- c. Keeps the NSIR/DPR Director apprised of the status of FEMA's assessment of offsite infrastructure and response capabilities, including FEMA's decision to perform a PCA and/or DIR, and the prognosis regarding the restoration of offsite infrastructure and response capabilities or implementation of interim compensatory measures that may

impact a licensee's decision to restart a reactor(s) or maintain a reactor(s) in a shutdown condition and associated impacts resulting from grid stability.

Periodically apprises the Office of Nuclear Reactor Regulation (NRR) project manager for the affected site(s) of the status of FEMA's assessment activities, including the prognosis for restoration of offsite infrastructure and response capabilities or implementation of interim compensatory measures.

- d. Designates someone else to perform their duties should they be unable to or due to extended response times. Appropriate parties should be informed of any designation as well as any updated contact information to allow timely communication. NOTE: Throughout this document, RLB Chief refers to both the RLB Chief as well as any designee.
- e. Keeps the DPR, Operations Branch Chief, apprised of emergency preparedness activities during the PCA and DIR process.

05.03 Director, Division of Preparedness and Response

- a. Interface with the FEMA Technological Hazards Division Director on issues related to FEMA's decision to perform a PCA and/or DIR and significant concerns related to the restoration of offsite infrastructure and response capabilities or implementation of interim compensatory measures.
- b. Participates, in coordination with the FEMA REP Programs Branch Chief, on DIR assessment activities, including the prognosis for restoration of offsite infrastructure and response capabilities or implementation of interim compensatory measures, and on licensee plans for reactor restart.
- c. Keeps the NSIR Director apprised of the status of FEMA's assessment of offsite infrastructure and response capabilities, including FEMA's decision to perform a PCA and/or DIR, and the prognosis regarding the restoration of offsite infrastructure and response capabilities or implementation of interim compensatory measures that may impact a licensee's decision to restart a reactor(s) or maintain a reactor(s) in a shutdown condition and associated impacts resulting from grid stability.
- d. Designates an actor to perform the duties of the division director if unable to or due to extended response times. Appropriate parties should be informed of any designation as well as any updated contact information to allow timely communication. NOTE: Throughout this document, DPR Director refers to both the DPR Director as well as any designee.

05.04 Project Manager for Affected Site, Division of Operating Reactor Licensing, Office of Nuclear Reactor Regulation

- a. Informs NRR division management on FEMA offsite assessment activities based on updates obtained from the RLB Chief.
- b. Informs the RLB Chief of licensee decisions and timing to restart a reactor(s) after a natural disaster or event.

05.05 Directors, Office of Nuclear Reactor Regulation and Office of Nuclear Security and Incident Response, and Regional Administrator(s)

- a. Participate in conference calls and status briefings from NSIR staff of the impacts on reactor restart or continued operation based on FEMA's assessment of offsite infrastructure and response capabilities for the affected nuclear power reactor site(s). Participate in decision-making calls as described in IRP 201, "Response Decision-Making."
- b. Apprise the Office of the Executive Director for Operations (EDO) and Commission of licensee restart or continued operation decisions that may be impacted by FEMA's assessment of offsite infrastructure and response capabilities.
- c. Engage licensee senior management on significant issues with offsite infrastructure and response capabilities that may (or should) impact a licensee's decision to restart or continue reactor operations during or after a natural disaster or event.

1601-06 REQUIREMENTS

06.01 The "Memorandum of Understanding Between the Department of Homeland Security / Federal Emergency Management Agency and Nuclear Regulatory Commission Regarding Radiological Response, Planning and Preparedness" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24184A043) describes each agency's responsibilities under the MOU.

- a. The NRC has overall authority for ensuring the adequacy of emergency plans and preparedness for NRC-licensed nuclear power reactors. The NRC will base its reasonable assurance finding for each power reactor on a review of the FEMA findings and determinations as to whether State and local emergency plans are adequate and capable of being implemented, and on the NRC assessment as to whether the licensee's emergency plans are adequate and capable of being implemented.
- b. FEMA has the lead in assessing the adequacy of offsite plans and preparedness and to certify that the State and local government emergency plans can and will be implemented in a manner to ensure public health and safety in the event of a radiological emergency at an NRC-licensed nuclear power reactor.

06.02 A FEMA finding of the failure to maintain reasonable assurance indicates the inability of the offsite response organizations to meet capability requirements of 44 CFR Part 350 and NUREG-0654/FEMA-REP-1 such that the health and safety of the population living around the plant would be adversely impacted and adequate protective measures could not be taken during an emergency. A compensatory measure or backup method may be available such that the capability requirements could be considered met.

FEMA's reasonable assurance finding will inform the NRC's reasonable assurance finding. The NRC will continue to presume reasonable assurance is maintained until the NRC receives specific information from FEMA that the licensee or OROs have lost the ability to implement one or more of the planning standards required to ensure the implementation of appropriate protective measures for the general public if needed.

06.03 The degraded condition of offsite infrastructure and response capabilities does not dictate the need for immediate action by the licensee.

- a. A licensee is not required under 10 CFR 50.54(s)(2)(ii) to immediately shut down due to degraded offsite emergency response infrastructure or response capabilities,¹ as long as the reactor continues to operate within its technical specification safety limits.²
- b. When an NRC-licensed nuclear power reactor has properly shut down in compliance with NRC regulations, there is no requirement for the licensee to obtain any specific authorization to restart, unless a technical specification safety limit has been exceeded. If a licensee wishes to restart, but the act of restarting would create a non-compliance with NRC requirements or the terms of the operating license, then the licensee would first need to resolve the potential non-compliance. Resolution of the potential non-compliance would be fact based and might involve requesting prior NRC approval of a change to the operating license.
- c. For a natural disaster or event where one unit at a multi-unit site has shut down, but the second unit remains at power, the shutdown unit could restart if allowed by its operating license (which includes technical specifications) and not contrary to any applicable regulations or controlling requirements. If the licensee was in non-compliance with an offsite EP requirement, but the licensee for the shutdown unit chose to restart its unit, the licensee would be in the same regulatory position under 10 CFR 50.54(s)(2)(ii), as discussed in the preceding paragraphs. The NRC staff would then have to justify that the deficiencies in offsite EP will cause an immediate public health and safety concern to support consideration by the Commission of an order to shut down, or prevent the restart of the unit(s).³
- d. The NRC may issue, per the NRC's Enforcement Policy and Appendix F to the NRC Enforcement Manual, "Notices of Enforcement Discretion," a Notice of Enforcement Discretion under specified conditions to permit continued reactor operation. Such conditions could include when a licensee foresees that compliance with its technical specifications could require an unexpected reactor shutdown during severe weather or other natural phenomenon that could exacerbate already degraded electrical grid

¹ 10 CFR 50.54(s)(2)(ii) provides for a four-month (120 day) period for correction of deficiencies in offsite emergency preparedness. If the deficiencies are not corrected within 120 days of a Commission finding of deficiency, the NRC is required to determine whether the plant should be shut down or whether enforcement action is appropriate. In making that determination, the Commission may consider various factors, including "other compelling reasons for continued operation."

² Per 10 CFR 50.36(c)(1)(i)(A), "Safety Limits" for nuclear reactors are limits upon important process variables that are found to be necessary to reasonably protect the integrity of certain physical barriers that guard against the uncontrolled release of radioactivity.

³ With respect to the grace period allowed under 10 CFR 50.54(s)(2)(ii), in the preamble for the final rule entitled, "Evaluation of the Adequacy of Off-Site Emergency Planning for Nuclear Power Plants at the Operating License Review Stage Where State and/or Local Governments Decline to Participate in Off-Site Emergency Planning" (52 FR 42078; November 3, 1987), the Commission stated that "a plant may ordinarily operate for at least four months with deficiencies in emergency planning before the NRC is required even to decide whether remedial action should be taken. ...[Thus,] the 120-day clock provision for emergency planning deficiencies amounts to a Commission finding that, at least for the first 120 days, even a major deficiency in emergency planning does not automatically raise a 'substantial health or safety issue' with regard to plant operation. By contrast, a major deficiency related to emergency conditions – for example, the availability of the emergency core cooling system – would warrant immediate shutdown."

conditions or other conditions that could have an adverse impact on the overall health and safety of the public.

- e. None of the above situations precludes the Commission from taking action in accordance with its authority under the Atomic Energy Act of 1954, as amended, to immediately order a reactor shutdown or prevent a restart if conditions cause immediate radiological health and safety concerns.
- f. To support a decision on granting enforcement discretion to allow a reactor to restart or to preclude a shutdown following a severe national disaster or event (i.e., hurricane), RLB Chief will contact the U.S. Department of Energy (DOE) Surveillance Office at (202) 586-8100 / doehqeoc@oem.doe.gov to obtain information on the condition of the electrical grid and inform the Director, Division of Preparedness and Response and the NRR project manager on matters related to grid stability.

1601-07 GUIDANCE

07.01 Regional State Liaison Officers/ Regional Government Liaison Officers

- a. For a natural disaster or event potentially affecting an NRC-licensed nuclear power reactor facility, where there will be an advance notice (e.g., hurricane), contact the affected FEMA RAC chair 72-96 hours prior to expected arrival of the event in the vicinity of the facility to coordinate the following:
 - 1. Participate in pre-planning meetings or conference calls with the FEMA region and affected State, Tribal, and local response organizations to discuss post-event disaster review coordination and identification of potential compensatory measures.

Note: If the NRC's incident response program is activated, information about potential Emergency Action Level thresholds and down power/shutdown guidance can be used to inform FEMA region and State and local officials on applicable emergency plan classification thresholds and down-power/shutdown guidelines.
 - 2. If the NRC incident response program is activated, consider co-locating NRC personnel with FEMA regional staff prior to the event at State and/or local emergency operations centers expected to be impacted.
- b. Support NRC incident response activities as designated in IRP-204, "Natural Phenomena," including keeping the RLB Chief, apprised of planned coordination efforts with the respective FEMA RAC chair.
- c. Contact the respective FEMA RAC chair(s) to obtain an immediate post-event assessment (situational report) of the event's impact on offsite infrastructure and response capabilities for the affected nuclear power reactor site(s), based on FEMA's initial review and discussions with State and local officials. This assessment should include the following information as it becomes available:
 - Overview of the known damage to offsite infrastructure and response capabilities that could potentially preclude the ability to implement an appropriate protective action recommendation for the public, if needed.

- Prognosis (based on known information) for restoration of capabilities or implementation of appropriate interim compensatory measures.
 - Whether FEMA has determined, at that point, the need for further offsite assessment.
- d. If FEMA determines the need to perform a PCA, but prior to FEMA determining the need for a DIR, continue to serve as the NRC's primary point of contact for communication and coordination with FEMA via the RAC **chair**(s) on the status of offsite EP capabilities, which includes:
1. Keep NRC Headquarters, via the RLB Chief, **regional** management, and (if activated) the **agency's incident response program** periodically apprised of the status of FEMA's assessment activities.
 2. Maintain frequent contact with respective FEMA RAC **chair**, or designated FEMA regional point of contact as appropriate, to support FEMA's assessment of offsite infrastructure and response capabilities and provide status to FEMA of licensee's proposed plans for continued operation or reactor restart activities, and any other licensee-related input that may have a bearing on FEMA's determination as to whether a DIR is warranted.
 3. Promptly advise the RLB Chief and **regional** management of FEMA's PCA results and any recommendation to FEMA Headquarters by the cognizant FEMA **region** on whether or not to conduct a DIR.
- e. When notified by the RLB Chief, or FEMA RAC **chair**, of FEMA's decision to initiate a DIR, perform these steps:
- Note: The decision to initiate a DIR will be made by the FEMA Director, THD, at the recommendation of the FEMA RAC **chair**, and should include a verbal and written notification to the **NSIR/DPR** Director.
1. Participate in the FEMA-led DIR discussions and periodic FEMA status calls with affected State(s), local counties/parishes, and Tribal **governments**.
 2. Determine, through communication with State and local counterparts, the status of roadway access to and from the reactor site and provide this information to **regional management** and RLB Chief.
- f. Obtain from the **regional reactor inspection division(s)** or **NRC incident response program** (if activated) information regarding important developments in the onsite recovery, and restart timeline if reactor(s) have been shut down, to support the FEMA-led DIR. This information should include the general condition of the licensee's facility and EP capabilities that may impact offsite response capabilities. **A brief documented assessment of the following elements should be completed with the support from appropriate regional inspector(s) and provided to the RLB Chief with a particular focus on the status of the following:**
- Means of communication between the licensee and the offsite authorities.
 - Status of licensee's offsite emergency response facilities.
 - Status of licensee's offsite radiological monitoring capabilities.

- Availability of site meteorological parameters required for dose assessment, and
 - Status of **primary and backup alert and notification systems (ANS)** (e.g., sirens) if maintained by the licensee. **If not maintained by the licensee (e.g., Integrated Public Alert and Warning System-Wireless Emergency Alert (IPAWS-WEA), these elements would be assessed by FEMA's DIR.**
- g. Continue to provide periodic updates to the RLB Chief, **regional** management, and the **agency's incident response program** (if activated), on activities associated with FEMA's review of offsite EP capabilities and infrastructure.
 - h. Participate in periodic conference calls in support of NRC Headquarters and **regional incident response** activities per IRP-204.
 - i. Provide, as appropriate, initial status update information, periodic updates, and final status update on NRC response and licensee restoration and **startup** activities to the respective State counterpart(s).
 - j. Assist the NRC **regional** Office of Public Affairs (OPA), if requested, with establishing OPA communications with respective **state public information officer** counterparts.
 - k. Once informed by the RLB Chief of the FEMA Headquarters' DIR results, provide this information to senior **regional** management.
- 07.02 Chief, Reactor Licensing Branch, Division of Preparedness and Response, Office of Nuclear Security and Incident Response
- a. When notified by the **NSIR manager on-call** of the potential for a natural disaster or event having significant impact on the area surrounding an NRC-licensed nuclear power reactor facility, remain available to respond to the Headquarters Operations Center if activated.
- Note: For a natural phenomenon per IRP-204, this notification should occur **72-96** hours prior to expected arrival of the event in the vicinity of an NRC-licensed nuclear power reactor facility.
- b. Assess the need for and, as appropriate, conduct just-in-time training for NSIR staff and management, **RSLO(s)/RGLO(s)** in affected region(s), and NRR project managers responsible for facilities most likely to be impacted.
 - c. Establish and maintain periodic communication with the **RSLO(s)/RGLO(s)** in affected **region(s)** to become apprised of coordination with FEMA Region on pre-event preparations and coordination plans, and subsequent post-event efforts to assess the impact on offsite infrastructure and response capabilities for affected nuclear power reactor site(s).
 - d. Establish and maintain periodic communication with the FEMA Chief, REP Programs Branch on respective agency pre- and post-event response activities.
- Note: Coordination of inter-agency pre- and post-event response activities remains at the **regional** level prior to a FEMA determination that a DIR is warranted.

1. Depending on the expected severity of the natural disaster or event on an NRC-licensed nuclear power reactor facility(ies), coordinate with the incident response team if activated to request that FEMA designate a liaison to report to the NRC Headquarters Operations Center.
 2. Discuss any issues in regional communication and/or coordination between FEMA and NRC, as identified by the RSLO/RGLO, with the FEMA REP Program Branch Chief.
- e. Based on discussions with RSLO(s)/RGLO(s) and FEMA, brief the NSIR/DPR Director on the following:
- RSLO(s)/RGLO(s) pre-event preparations and coordination plans with the respective FEMA Region, and
 - Results of immediate and subsequent periodic post-event assessments by FEMA Region(s) with affected State and local officials on offsite infrastructure and response capabilities.
- f. When informed by FEMA REP Programs Branch Chief, of the FEMA Region(s) intent to conduct a PCA, perform the following:
1. Contact the respective RSLO(s)/RGLO(s) to obtain an update on the status of offsite infrastructure and response capabilities, and licensee's proposed plans for continued operation or reactor restart activities, and brief NSIR/DPR Director and respective NRR project manager on status.
 2. Participate in conference calls established in accordance with IRP-204 for natural phenomena affecting a nuclear power reactor facility.
 3. Respond to any requests for information and obtain periodic status reports on FEMA activities from the FEMA REP Program Branch Chief, to ensure alignment at headquarters level between agencies. However, communications and coordination between FEMA and NRC regarding the conduct of a PCA will be handled at the regional level through the respective FEMA RAC chair(s) and RSLO(s)/RGLO(s).
- g. Once the NSIR/DPR Director is notified by FEMA Technological Hazards Division Director, of the outcome of a PCA and/or intent to perform a DIR, perform the following steps:
1. Ensure FEMA's findings on the PCA, if performed, and decision whether or not to initiate a DIR, as well as other relevant correspondence between agencies, are entered in ADAMS as publicly available.
 - Provide a copy of FEMA's PCA findings to the NRR project manager for the affected site(s).
 2. Act as the point of contact with the FEMA REP Programs Branch Chief, regarding the periodic status of the DIR activities, including a schedule for the conduct of the DIR.

3. Provide information to FEMA on continued reactor operations or restart activities and obtain periodic verbal status reports from FEMA REP Programs Branch Chief, to include, per the Memorandum of Understanding, interim written reports of its findings, as appropriate, and the bulleted items below.
 - What offsite EP capabilities and/or infrastructure are impacted, and specific deficiencies have been identified.
 - Whether identified deficiencies prevent or significantly degrade the effective and timely implementation of a protective action decision; and
 - Expected timeframe for completing restoration activities or implementation of compensatory measures.
4. Participate in periodic status calls conducted in accordance with IRP-204 and, as requested, with State(s) and local response organizations in support of FEMA.
- h. Notify FEMA Headquarters, in writing, of the schedule for restart of an affected reactor and provide updates on any changes to that schedule.

Note: Communications of reactor restart activities may be provided verbally to FEMA Headquarters initially and should be provided in writing via email as soon as practicable.
- i. Ensure that the designated NRR project manager for the affected licensee, NSIR/DPR director, and applicable RSLO(s)/RGLO(s) are informed of any new developments regarding FEMA's assessment of offsite infrastructure and response capabilities, decision to perform a DIR, and expectations for issuance of FEMA's findings.

Note: FEMA Headquarters may initially provide DIR results, either verbally (call through the NRC Headquarters Operations Officers (HOOs)) or via email or fax, prior to the issuance of a formal written statement of findings. If FEMA's PCA/DIR will not be completed in time to verify continued reasonable assurance to inform a licensee's proposed restart schedule, or if the nuclear power reactor is operating and FEMA determines that continued reasonable assurance cannot be verified for an extended period, then discuss the status of offsite emergency preparedness with the NSIR/DPR Director to determine an appropriate course of action.
- j. At the NSIR/DPR Director's request, set-up a conference call, in coordination with the NRC HOOs, with the senior NSIR and NRR management, regional management, the Deputy Executive Director for Reactor and Preparedness Programs (DEDR), and representatives from OPA and the Offices of the General Counsel (OGC) and Congressional Affairs (OCA), to keep them aware of significant DIR activities, DOE's assessment of grid stability, and impact on NRC decisions related to licensee restart or continued operation. This conference call may be through the HOOs or via a video conferencing application, with pertinent leadership to inform them of FEMA's decision.
- k. Periodically apprise the FEMA Headquarters REP Programs Branch Chief of NRC discussions regarding plant restart, and inform FEMA in writing (via email) of any changes in a reactor's restart schedule.

- l. Ensure the documentation of FEMA's final DIR report is entered into ADAMS and provide a copy of FEMA's findings to the NRR project manager for the affected site(s)
- m. Ensure this procedure is provided to relevant NRC managers and stakeholders prior to NSIR staff briefings or meetings.

07.03 Director, Division of Preparedness and Response

- a. Obtain briefings from the RLB Chief on FEMA's immediate post-event assessment (situational report) of offsite EP capabilities, as well as FEMA's decision and proposed timeline for conducting a PCA, based on updates received from the respective RSLO/RGLO and FEMA REP Programs Branch Chief. Information provided should include the following:
 - What offsite EP capabilities and/or infrastructure are impacted, and specific deficiencies have been identified.
 - Whether identified deficiencies prevent or significantly degrade the effective and timely implementation of a protective action decision, and
 - Expected timeframe for completing restoration activities or implementation of compensatory measures.
- b. Communications and coordination between FEMA and NRC regarding the conduct of a PCA will be handled at the regional level through the respective FEMA RAC chair(s) and RSLO(s)/RGLO(s). The DPR Director will maintain timely and frequent internal NRC communications to support informed NRC decision-making.
- c. Communicate directly with the FEMA THD Director to understand conditions for affected communities surrounding an NRC-licensed nuclear power reactor facility and the status of FEMA event response activities.
- d. Update and periodically apprise NSIR office management of status of FEMA's assessment of offsite infrastructure and response capabilities for an affected nuclear power reactor site(s), including deficiencies identified and prognosis for restoration or implementation of compensatory measures.
- e. If informed by the RLB Chief that FEMA's assessment of offsite infrastructure and response capabilities will not be complete in time to verify continued reasonable assurance to inform a licensee's proposed restart schedule, or if the nuclear power reactor is operating and FEMA determines that continued reasonable assurance cannot be verified for an extended period, then perform the following:

Note: FEMA's results of a PCA and decision on whether or not to perform a DIR will be communicated via email or fax using standard text examples provided in FEMA's PCA/DIR SOG. However, FEMA's decision may be communicated verbally (via the NRC HOO's recorded line) if the need exists to promptly communicate FEMA's determination to inform a potential reactor restart, and then followed up by documentation via email or fax. A final DIR report will be subsequently provided by FEMA formally documenting the results of the DIR in regard to continued reasonable assurance.

1. Communicate with the FEMA THD **director** to discuss reactor restart or operating status for impacted site(s) and obtain a better understanding of: (1) issues delaying FEMA's evaluation; (2) identified or expected deficiencies and impact on the implementation of appropriate offsite protective measures, and (3) expected timeframe for completing restoration activities or implementation of compensatory measures.
2. Ensure NSIR **office management** is kept apprised of: (1) FEMA's assessment activities and decisions, including significant deficiencies identified in offsite infrastructure and response capabilities and status of restoration/compensatory measures for the affected nuclear power reactor site(s); (2) potential impact on decision-making regarding reactor restart or continued operation at affected reactor site(s); (3) electrical power grid issues; and (4) emergency event classification and status of licensee's emergency response capabilities.
3. Based on discussions with NSIR **office management**, if the combination of onsite and offsite post-event conditions may be considered an immediate risk to public health and safety, or of sufficient concern to make continued or renewed reactor operations inadvisable, then request that the RLB Chief coordinate with the **NRC HOOs** to set-up a conference call in order to facilitate **decision-making and** timely communication with senior NSIR, NRR, and **regional** management and the DEDR and representatives from OGC, OPA, and OCA.

Note: The purpose of this call is to keep these key managers and staff aware of FEMA offsite assessment activities and findings, and **the** impact on NRC decisions related to licensee restart or continued operation, to formulate a recommended course of action by the NRC and to determine appropriate follow-up actions to be communicated to the licensee and FEMA.

- f. Provide documentation received from the FEMA THD **director** regarding PCA outcome, decision to perform a DIR, periodic status reports, and DIR finding of reasonable assurance to the **RLB** Chief for entry into ADAMS.

07.04 NRR Project Managers for the Affected Site(s)

- a. Inform NRR management of any decision by FEMA to perform a PCA or DIR, and proposed schedule for completion, based on periodic updates provided by the **RLB** Chief (NSIR/DPR).
- b. Keep the **RLB** Chief informed of any new developments regarding proposed reactor restart schedules and activities.

07.05 Directors, Office of Nuclear Reactor Regulation and Office of Nuclear Security and Incident Response, and Regional Administrator(s)

- a. Participate in a **decision-making** call **as part of IRP 201, "Response Decision-Making,"** to: (1) discuss impacts on reactor restart or continued operation decision-making activities based on FEMA's assessment of offsite infrastructure and response capabilities for the affected nuclear power reactor site(s), including deficiencies identified that may impact the implementation of appropriate offsite protective measures, and the status of restoration/compensatory measures; (2) formulate a recommended course of

action; and (3) determine appropriate follow-up actions with the licensee and FEMA, as appropriate.

1. Involve OPA and OCA in discussions concerning the NRC's response to a licensee's decision to restart or continue operations where FEMA's assessment of offsite infrastructure and response capabilities indicates continued reasonable assurance is challenged, or when FEMA's assessment verifying continued reasonable assurance cannot be completed in time to inform a licensee's restart schedule. Seek legal advice from OGC.
2. Keep the EDO and Commission informed about a licensee's decision to restart or continue operations. When a FEMA assessment of offsite infrastructure and response capabilities indicates its continued reasonable assurance is challenged, then consider a recommendation to the Commission regarding issuing an order to the licensee, preventing reactor restart or directing the shutdown of an operating reactor if the staff believes that an immediate risk to public health and safety exists due to onsite and offsite conditions.

- b. If deemed appropriate, discuss with licensee senior management the NRC's view that the licensee should maintain the reactor in a shutdown condition to allow sufficient time for FEMA to complete an initial assessment of offsite EP capabilities, or to consider a shutdown or delay restart of the reactor(s) at the affected site(s) if FEMA's interim findings determine that there is a significant degradation in offsite infrastructure and response capabilities that would adversely impact the ability to implement appropriate offsite protective measures and appropriate compensatory measures or restoration efforts cannot be implemented within a reasonable period.

Note: The regional administrator shall be the primary point of contact with senior licensee management regarding reactor operating decisions, unless designated otherwise.

07.06 Regional Branch Chief for the Affected Sites

- a. Keep the RSLO/RGLO and resident inspector informed of any new developments regarding the proposed reactor restart schedules and activities.
- b. Keep the RLB Chief informed of any new developments regarding proposed reactor restart schedules and activities.

1601-08 REFERENCES

"Memorandum of Understanding Between the Department of Homeland Security / Federal Emergency Management Agency and Nuclear Regulatory Commission Regarding Radiological Emergency Response Planning and Preparedness," dated July 1, 2024. (ML24184A043)

FEMA SOG, "Assessment of Offsite Emergency Preparedness Infrastructure and Capabilities Following an Incident in the Vicinity of a U.S. Nuclear Regulatory Commission Licensed-Nuclear Power Plant." (September 2022)

NRC IRP 204, Revision 2, "Natural Phenomena."

NRC IRP 201, Revision 2, "Response Decision-Making."

END

Attachment 1: Revision History for IMC 1601

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Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML031830250 CN 03-020 6/24/03	N/A		
N/A	ML052010043 CN 05-018 07/07/05	Revised to improve internal and external communication and coordination when determining the status of offsite emergency preparedness in support of reactor restart. This IMC's scope has been expanded to not only include natural disasters, but also malevolent acts or extended reactor shutdowns. It also includes a new Appendix A checklist for tracking completion of IMC activities. IMC 1601 is also being revised to reflect the organizational change of emergency preparedness staff from NRR to NSIR.	N/A	N/A
N/A	ML110250098 09/16/11 CN 11-017	Editorial Changes. Updated to maintain alignment with FEMA DIR SOG and improve coordination and communication	N/A	ML110250098
N/A	ML121200174 07/17/12 CN 12-015	Updated to maintain alignment with Final FEMA DIR SOG and to include considerations and actions for reactors that are still operating.	N/A	ML12150A209

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML13137A326 08/27/13 CN 13-018	Add guidance on expected communications and coordination during the PCA phase at the regional level between the appropriate FEMA Regional Assistance Committee Chair and NRC RSLO. Inserted expected actions for the NSIR/DPR Director. Clarified option for verbal communication of FEMA assessment results between agencies. Added SharePoint link to FEMA's DIR SOG provided. Eliminated checklists and incorporated actions under position Responsibilities and Authorities Section to minimum confusion and potentially conflicting direction within document.	Review of PCA/DIR process and changes to IMC as part of available in-person opportunities or formal training opportunities.	
N/A	ML18093A372 06/29/18 CN 18-018	Added guidance to clarify inter-agency communications and coordination at the regional level, NRC authorities regarding precluding reactor startup and requiring shutdown following natural disaster, and resolution of concerns regarding electrical grid stability. Changes also made to better align IMC with FEMA SOG and NRC IRP-204, Revision 2.	Review of PCA/DIR process and changes to IMC as part of available in-person opportunities or via conference bridge.	ML18123A288
N/A	ML24057A095 Date: 11/22/24 CN 24-037	IMC-1601, 5-year revision. Added guidance on written communications. Modified format according to NRC's guidelines. Updated guidance according to new procedures and program changes. Editorial changes to provide clarity.	Review of PCA/DIR process and changes to IMC as part of available in-person opportunities or formal training opportunities.	ML24060A229