

**From:** William Huffman *NRL*  
**To:** Robert Palla *NRL*  
**Date:** 8/31/00 1:48PM  
**Subject:** EP for Decommissioning

Bob,

attached is a difference list I generated per your request. I have asked Falk Kantor to look at it but have not yet received his opinion.

I guess we should wait until Dan Barss gets back before we formalize this to FEMA.

.....Bill

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### EP for Decommissioning Plants After 1 Year Decay Time

The following bullets summarize the major differences between operating reactor EP and the proposed rulemaking plan before the Commission:

- Licensee would no longer have to have a formalized EPZ's and coordination with state and local organizations within those EPZs as to specific responsibilities and actions.
- Appendix E would no longer be invoked.
- It should be noted that the high-level elements of the operating reactor EP program would still be required. However, a large amount of flexibility on how implementation of the EP program would be permitted. For example; the decommissioning licensee would still be required to promptly notify offsite authorities, characterize the releases, and make protective action recommendations.
- Eliminate the requirement for an offsite EOF, onsite TSC, and onsite OSC.
- The need for promptly notifying the public using such things as the siren system, tone alert radios, or National Weather radios would not be required (15 minute/15 minute standard). The licensee would still have to have a means of promptly notify offsite organizations and communicating with the public.
- Eliminate the requirement for a biennial (every 2 years) full participation exercise. Onsite biennial exercises would still required in addition to semiannual drills. Offsite organizations would be invited but not required to participate.
- Licensee training of offsite State, local, or other personnel potentially involved in EP would not be mandatory but would be made available.
- Monthly communications checks would be changed to quarterly
- No ingestion pathway exercises will be required.