

August 9, 2007

MEMORANDUM TO: Stephen D. Dingbaum
Assistant Inspector General for Audits

FROM: William F. Kane */RA/*
Deputy Executive Director for Reactor
and Preparedness Programs
Office of the Executive Director for Operations

SUBJECT: AUDIT OF NRC'S EMERGENCY PREPAREDNESS PROGRAM
(OIG-07-A-13)

This document responds to the June 25, 2007, memorandum transmitting the subject audit report. The objectives of the audit were to evaluate the following:

- (1) The Nuclear Regulatory Commission's (NRC) efforts to ensure that nuclear power plant licensees have adequate Emergency Preparedness (EP) plans and programs for security-based emergencies; and
- (2) NRC's coordination with Federal, State, and local authorities to plan and prepare for security-based emergencies.

With respect to the first objective, the Office of the Inspector General (OIG) found that NRC is sufficiently ensuring that nuclear power plant licensees have adequate EP plans and programs. The OIG's report did find a weakness in how the NRC coordinates and implements its coordination responsibilities under the National Response Plan, as indicated in some Incident Response exercises. NRC has addressed each of the OIG's specific recommendations. Please note that the dates in the responses are subject to the Department of Homeland Security providing a finalized version of the National Response Plan or its replacement. This is expected in the Fall of 2007. Also, note that current indications are that the National Response Plan will be dramatically altered into a higher order National Response Framework, and the associated annexes will not be issued until later. This may substantively alter the projected completion dates as well.

Recommendation 1

Identify, clarify in NRC policy, and communicate to internal and external stakeholders, NRC's coordination role and responsibilities under the National Response Plan.

CONTACT: William A. Gott, NSIR/DPR
(301) 415-7966

Response

Agree. The National Response Plan and the Nuclear/Radiological Incident Annex specify the roles and responsibilities of the coordinating and cooperating agencies. The NRC may be required to act as either or both depending on the severity of an incident. The NRC has promulgated these roles and responsibilities in NUREG-0728, "NRC Incident Response Plan," and Management Directive (MD) 8.2, "NRC Incident Response Program." Individual incident response teams also have incorporated these roles and responsibilities into their plans and training. As demonstrated during recent exercises, NRC has improved its ability to communicate its role as the Federal coordinating agency to State decision makers. The Division of Preparedness and Response/Incident Response (DPR/IR) will develop a presentation for stakeholders on the NRC's coordination role and responsibilities under the National Response Plan (or its successor). This presentation will assist NRC staff in providing a consistent message regarding the NRC's role and responsibilities during future training and outreach activities with State and local authorities. Completion date: March 31, 2008.

Recommendation 2

Develop and implement a consistent approach for carrying out NRC's coordination role and responsibilities in accordance with the National Response Plan.

Response

Agree. As stated above, NRC's roles and responsibilities are listed in our Incident Response Plan. Individual incident response teams also have incorporated these roles and responsibilities into their procedures and training. With this new guidance, the Incident Responders have more consistent guidance on the NRC's role with respect to the National Response Plan. The structured training process which began in FY07 provides for a consistent approach for carrying out NRC's coordination role in accordance with the National Response Plan. DPR/IR will perform the following:

- (1) Include an emphasis on NRC's coordination role and responsibilities as a coordinating agency as part of the routine training for emergency response organization members. Completion date: March 31, 2008.
- (2) Enhance outreach activities with State and local responders by distributing the presentation on NRC's coordination role and responsibilities (to be developed per response to Recommendation 1) to the Regional and Headquarters outreach teams. Completion date: March 31, 2008.

cc: Chairman Klein
Commissioner McGaffigan
Commissioner Jaczko
Commissioner Lyons
SECY

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