

Public Meeting Between The NRC Staff And NEI To Discuss NEI 11-03 and NEI 11-05

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And SME

NEI 11-05

**Guidelines for Implementation of NRC EP
Rule Changes and Interim Staff Guidance**



Purpose

- **Structured approach to ensure consistent implementation:**
 - Emergency Response Organization Augmentation at Alternative Facility
 - Protective Actions for Onsite Personnel
 - Licensee Coordination with Offsite Response Organizations (ORO)
 - Challenging Drills and Exercises
 - ORO Event Integration with Nuclear Power Plants



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Development Approach

- **Reviewed for actionable statements:**
 - Federal Register Notice
 - Discussion
 - Analysis
 - Regulatory language
 - NSIR/DPR-ISG-01, Interim Guidance for Nuclear Power Plants
 - Regulatory Analysis and Backfit Analysis



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Development Approach

- Reviewed for actionable statements:
 - Summary and Analysis of Public Comments on Proposed Rule
 - Supplement 4 to NUREG-0654/FEMA REP 1



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Development Approach

- And with the aid of SME's developed a set of:
 - Checklists
 - Worksheets
 - References
 - Examples (samples)



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Development Approach

And where possible provided a cross reference back to source document

<input type="checkbox"/>	Evaluate your existing facilities for suitability as an ALTERNATIVE FACILITY by using the instructions and tools in Appendix A, Worksheet 1 "Application of Facility Characteristics."
<input type="checkbox"/>	Ensure a process has been established in your emergency response procedures to deploy onsite ERO to an ALTERNATIVE FACILITY during working hours and during off-normal hours. [FRN-D, 22, 2] [ISG,16,4]
<input type="checkbox"/>	Evaluate your existing facilities for suitability as an ALTERNATIVE FACILITY by using the instructions and tools in Appendix A, Worksheet 1 "Application of Facility Characteristics."



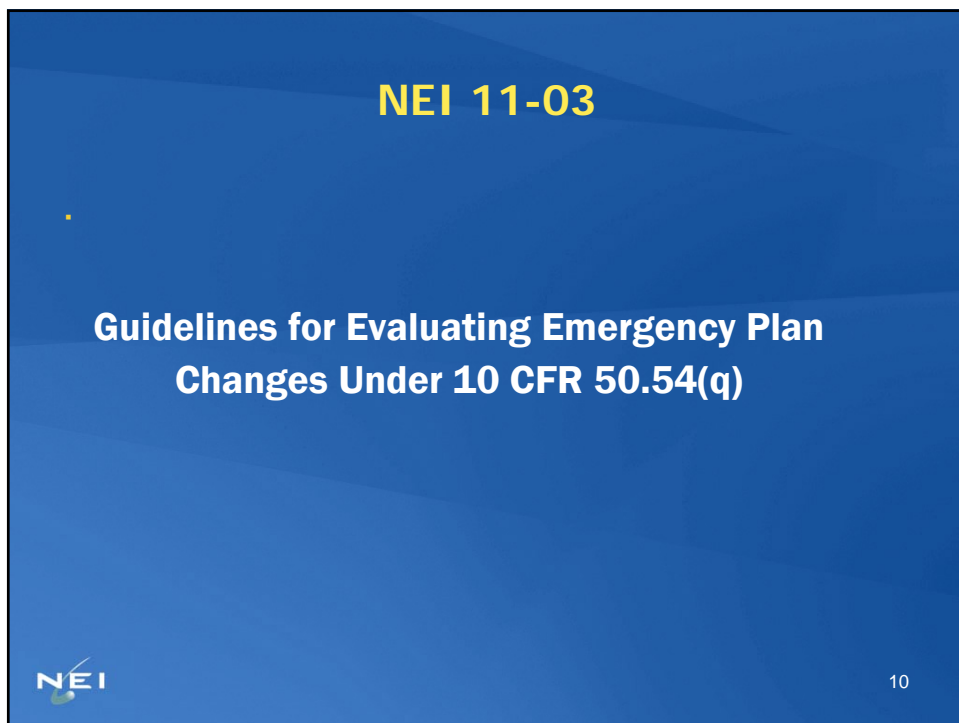
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And take a look
At some of the examples
In your handouts**

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Purpose

Provide a consistent approach in complying with 10 CFR 50.54(q) when making changes to emergency plans



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Development Approach

Closely follow:

**Regulatory Guide 1.219, Guidance on
Making Changes to Emergency Plans for
Nuclear Power Reactors**

To:

**Develop a Screening and Evaluation
Generic Template**



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Development Approach

- Use as a guide, RG 1.219:
 - Section 5.0, Review Process
 - 5.1 Screening Changes
 - 5.2 Evaluation Process
 - Appendix A, 10 CFR 50.54(q) Possess
 - Process flow chart



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Development Approach

Where possible referenced RG 1.219

From NEI 11-03, Appendix B, Instruction for
Completing the Sample Evaluation Form Page B-1

Part I. Description of Proposed Change

Identify the proposed change (event or action, or series of actions that may result in a change to the emergency plan or affect the implementation of the emergency plan) being reviewed. Each proposed change should be evaluated separately.

RG 1.219 Reference: See section 3.6 for a discussion of what constitutes a change and section 3.5 for a discussion of what constitutes the emergency plan.



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