

EMERGENCY PREPAREDNESS FREQUENTLY ASKED QUESTION (EPFAQ)

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STATUS
FINAL

RELEVANT GUIDANCE: SUPPLEMENT 3 TO NUREG-0654

APPLICABLE SECTION(S) SUPPLEMENT 3 TO NUREG-0654

QUESTION OR COMMENT

Clarify the acceptable means for documenting discussions between licensees and OROs on the development of mutually acceptable PAR logic using Supplement 3 to NUREG-0654/FEMA-REP-1.

PROPOSED SOLUTION

{NRC Staff generated EPFAQ}

NRC RESPONSE:

According to Section 2.1 of Supplement 3, the discussions between licensees and OROs regarding the development of mutually acceptable PAR logic should be documented in a manner available for review by the NRC and FEMA. The following examples describe several ways by which this documentation could be provided. One method is to document the discussions in a licensee memorandum that includes the results of the annual review of the licensee's emergency plan. The licensee may also choose to document the discussions in a separate memorandum on this specific topic. Another option would be for the licensee to provide input to the State annual letter of certification to FEMA documenting the discussions. Other methods could be a meeting agenda with a set of meeting minutes identifying the discussion. Documentation of this interaction could also be similar to what a licensee does now for reviewing the 10 CFR 50.54(t) offsite results with governmental agencies.

No specific method is required or preferred. The key point is that the discussions should be documented and that documentation of the outcome of the discussions regarding licensee PARs should be retained for review by the NRC and FEMA.

6/18/2012: The comments submitted by NEI (ADAMS Accession No. ML12156A263) do not suggest any changes to the NRC's response.
