

## **NRC Public Meeting Between The NRC And Industry**

### **Drill and Exercise Performance Indicator**

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### **Perspective on DEP PI**

- **The Notification PI was developed to reflect regulation and the EP Function**
  - **Appendix E – Notify within 15 minutes**
  - **Function – Initiate notifications within 15 minutes**
- **The notification function was revised by NRC**
  - **Deliver the ECL in 15 minutes**

### EP Notification Function

- **Regulation:**
  - A licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency
- **Function:**
  - **Pre-rule:** Initiating notification within 15 minutes
  - **Post-rule:** Alerting them of the declared emergency within 15 minutes

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### Arlington Texas Meeting

- An industry representative suggested that the DEP criteria be revised to align with regulatory requirement

*A licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency*

- The Emergency Preparedness Working Group (EPWG) represents the industry on generic matters
  - The EPWG does not support a change to the DEP criteria but is open to initiating NRC discussion

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## **Uniform Measurement of Performance**

- **Notification process common to all licensees**
  - **Complete notification form**
  - **Brief individual making notification**
  - **Use of notification equipment**
- **Notification process not common to all licensees**
  - **Variation in number of State and local authorities**

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## **Accepted Criteria**

- **NEI 99-02 does not describe the PIs as a substitute or surrogate for meeting the regulatory requirements of 10 CFR 50.**
  - **It does provide a yardstick for meeting the regulation and has for over 10 years**

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### **Other Option**

- **All Notification opportunities should be demonstrated to completion**
  - **DEP timeliness criterion remains the same**
    - **First agency contacted within 15 minutes**
  - **Evaluation should not end at point where first agency is contacted**
  - **Licensees should evaluate the entire notification process from initiation to completion**
  - **Propose a revision to the clarifying notes**

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### **Proposed Revision**

**The following text could be  
added to NEI 99-02 page 46 line 19**

**...ability to use the equipment and deliver all  
the mutually agreed upon essential  
elements.**

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