

NRC Public Meeting Between The NRC And Industry

Comments Related to NRC FAQ No. 2012-002

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Comment 1

- **What is the basis for the change in the planning standard function?**
- **RG 1.219**
 - **During the development of ROP we agreed to a series of planning standard functions**
 - **Process**
 - **Health and safety**
 - **Balance between accuracy, quality and timely**
- **Definition for verbal and validation**
 - **Use of technology**

Comment 1

- **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

3

Comment 2

- **Clarify what NUREG 0654 criteria needs to be included in the notification**
 - Only the Emergency Classification Level
- **Remove from the FAQ statement:**
 - Which may or may not include completion of the notification form
 - Not supported by emergency preparedness function

4

Comment 3

- **Provide examples of degraded capability**

5

Comment 4

- **When would the process for declaration and notification overlap?**
 - Recommend removal of the sentence
 - Alternatively – provide examples of when they would overlap

6

Comment 5

- **What does “with no undue delay” mean**
 - **Recommend using established regulatory language.**

7

Concluding Remarks

- **In attempting to answer the FAQ the NRC appears to introduce new and unclear requirements**
 - **Classification and notification overlap**
 - **No undue delay**
 - **Initial notification form is complete**
- **Continued dialog with industry would be preferred prior to finalization of the FAQ**

8