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November 8, 2013

Mr. Timothy Greten
Deputy Director
Technological Hazards Division
Federal Emergency Management Agency
1800 South Bell Street
Arlington, VA 20598-3025

Subject: Request for Clarification of Demonstration Requirements Related to Radiological Emergency Preparedness Exercises

Dear Mr. Greten:

The Nuclear Energy Institute (NEI) is requesting clarification of FEMA requirements related to the demonstration of certain offsite response capabilities during a biennial exercise. More specifically, we have two questions concerning the interpretation of assessment area demonstration criteria described in the Radiological Emergency Preparedness (REP) Manual. Our questions are presented below.

Question 1

Each Emergency Planning Zone (EPZ) has State and/or local (i.e., city, county and/or tribal) agencies responsible for determining and implementing public protective measures in response to a declared emergency at a nuclear power plant. Are all of these State and local agencies required to demonstrate their response to a radiological release, resulting in doses within their respective jurisdictions that exceed an evacuation Protective Action Guide (PAG), every 2 years (i.e., associated with each biennial exercise or in some other venue such as a tabletop exercise)? If not, what are the requirements in terms of both performance demonstrations and periodicity for each agency?

For example, consider the Prairie Island EPZ Map illustrated in the attachment. From this map, it can be seen that Sub-Area 10W, located in Dakota County, MN, lies between 5 and 10 miles from the plant site. Are the decision-makers in Dakota County required to demonstrate responses to a radiological release resulting in doses within their county that exceed an evacuation PAG, every 2 years (i.e., associated with each biennial exercise or in some other venue such as a tabletop exercise)? This question should then be generalized and applied to the other 2 EPZ counties (Goodhue County, MN, and Pierce County, WI), and both EPZ States as well.

Please note that the above question is applicable to any biennial exercise scenario, and is not dependent upon the magnitude of the postulated radiological release (i.e., significant vs. no/minimal release).

Question 2

Is the demonstration of the capability to develop Protective Action Recommendations (PARs) and Protective Action Decisions (PADs) based on plant conditions, and not radiological releases, sufficient to meet any of the 10 exercise demonstration criteria described in Exhibit IV-2, *Considerations for Demonstrating the 10 Criteria during a No/Minimal Release Scenario*, of the REP Manual without the need to conduct any additional demonstration activities? If so, which ones? The scenarios under consideration by this question are those which do not include offsite doses exceeding a PAG.

For example, it would appear that an ORO could satisfactorily demonstrate Assessment Area Sub-Element 2.b.1, *Radiological Assessment and Protective Action Recommendations and Decisions for the Plume Phase of the Emergency*, during an exercise that includes no/minimal radiological release. The ORO would develop PARs based on:

- Plant conditions – information and data available from the licensee
- Licensee PAR – developed based upon plant conditions and provided by the licensee
- Release data – data available and considered; in this case, the release rates/concentrations would be assessed as below any PAR threshold and confirm the suitability of the plant conditions-based PAR
- Meteorological data – data available and considered; would affect the selection of sub-areas for the plant condition-based PAR
- Field monitoring data – data available and considered; in this case, the field monitoring results would be assessed as below any PAR threshold and confirm the suitability of the plant conditions-based PAR
- Licensee and ORO dose projections – data available and considered; in this case, the dose projection results would be assessed as below any PAR threshold and confirm the suitability of the plant conditions-based PAR

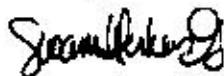
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- Knowledge of onsite and offsite environmental conditions – data available from onsite and offsite sources

The above performance aspects should be sufficient to meet the intent of Sub-Element 2.b.1 without the need to conduct any additional demonstration activity (e.g., a separate exercise activity not associated with the no/minimal release scenario).

We appreciate that these questions touch upon a variety of exercise development and evaluation criteria, and involve several technical issues. Please feel free to contact David Young at (202) 739-8127 or dly@nei.org if you require additional information concerning these questions.

Sincerely,



Susan Perkins-Grew

Attachment

c: Mr. Andrew Mitchell, FEMA/THD
Ms. Vanessa Quinn, FEMA/THD/REPB