

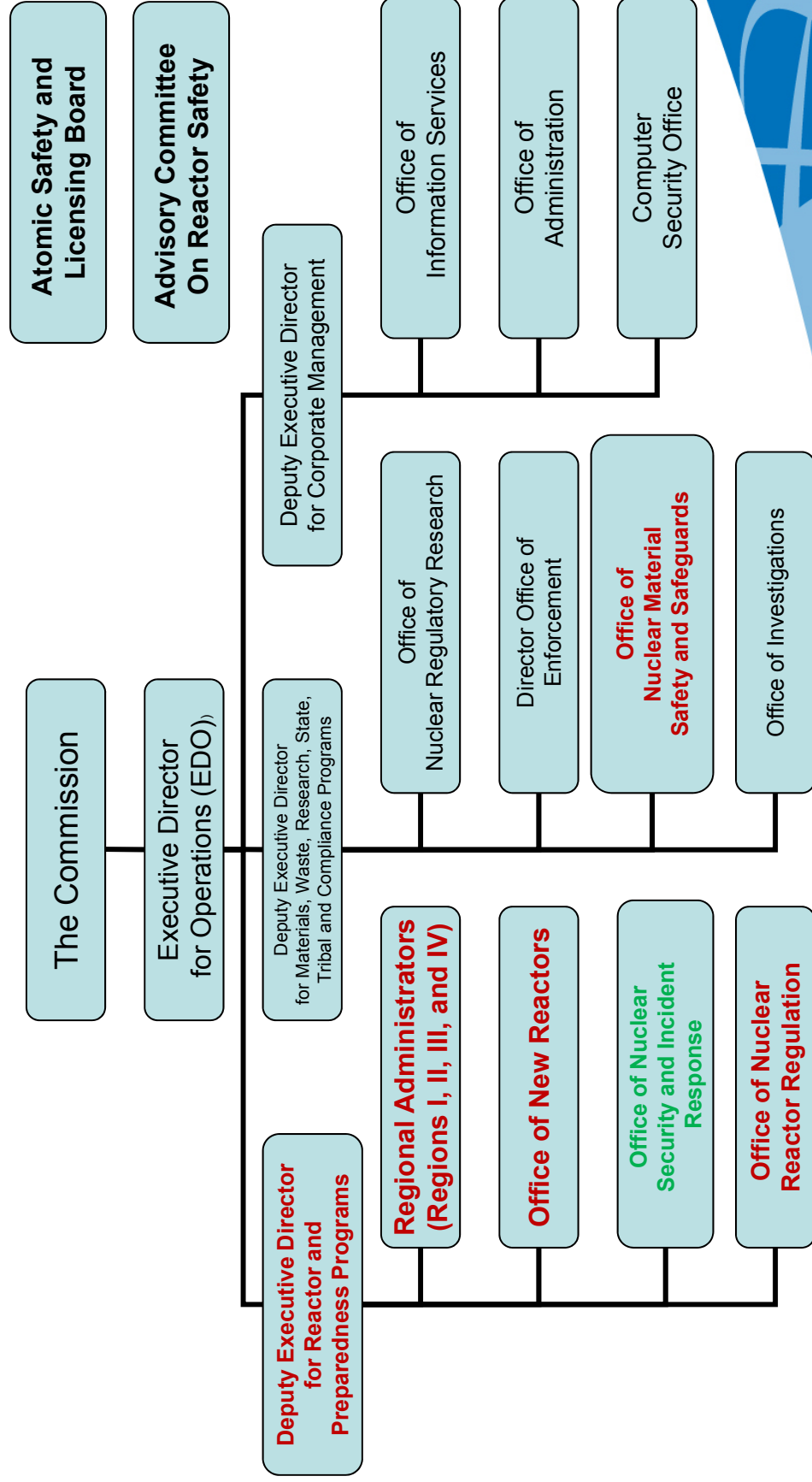
NRC Emergency Preparedness and Response Aspects

INPO New EP Managers' Seminar
August 17, 2015

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Regulatory Basis



Commission – Staff Interface

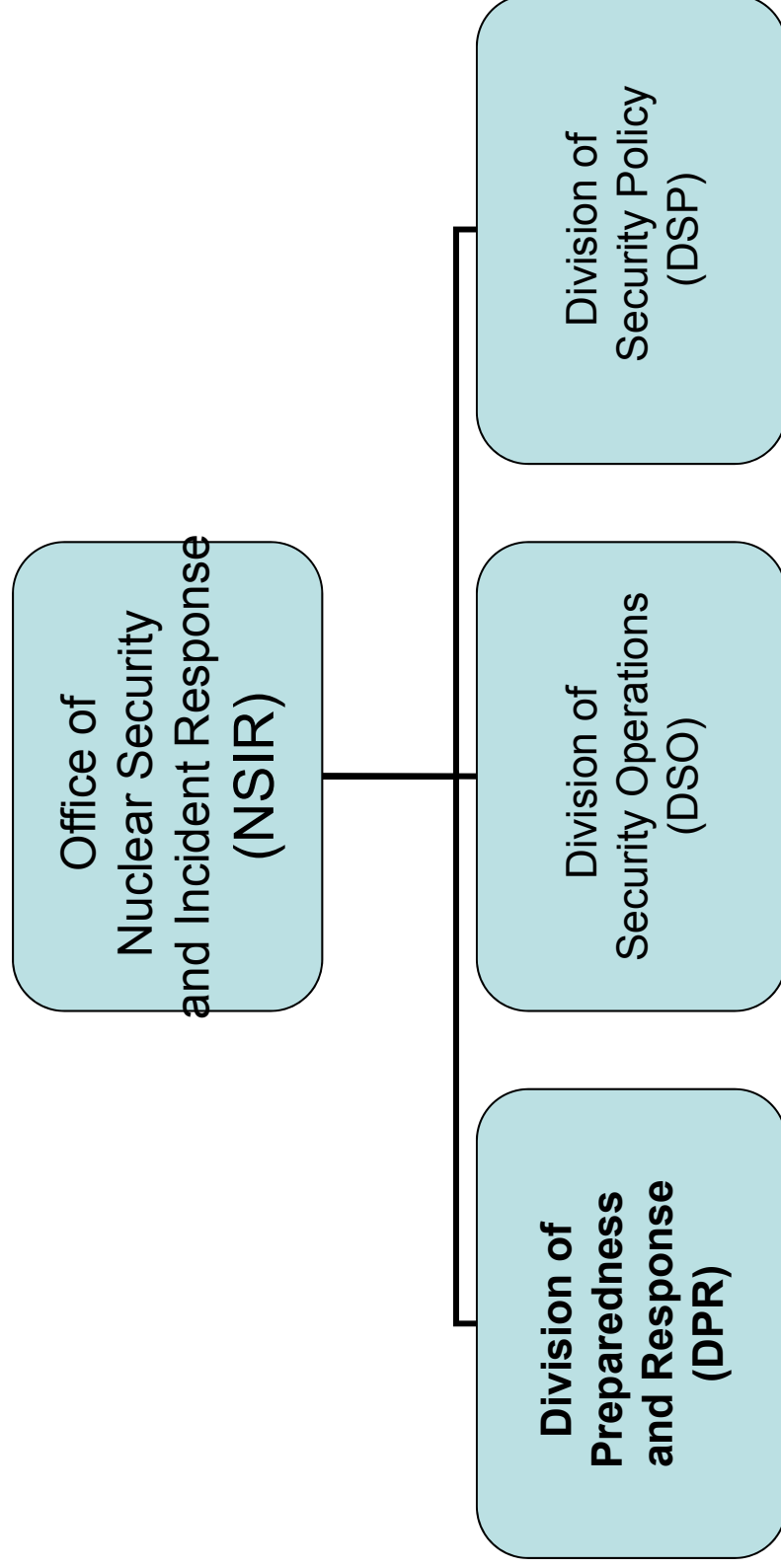


- Commission SECY Paper:

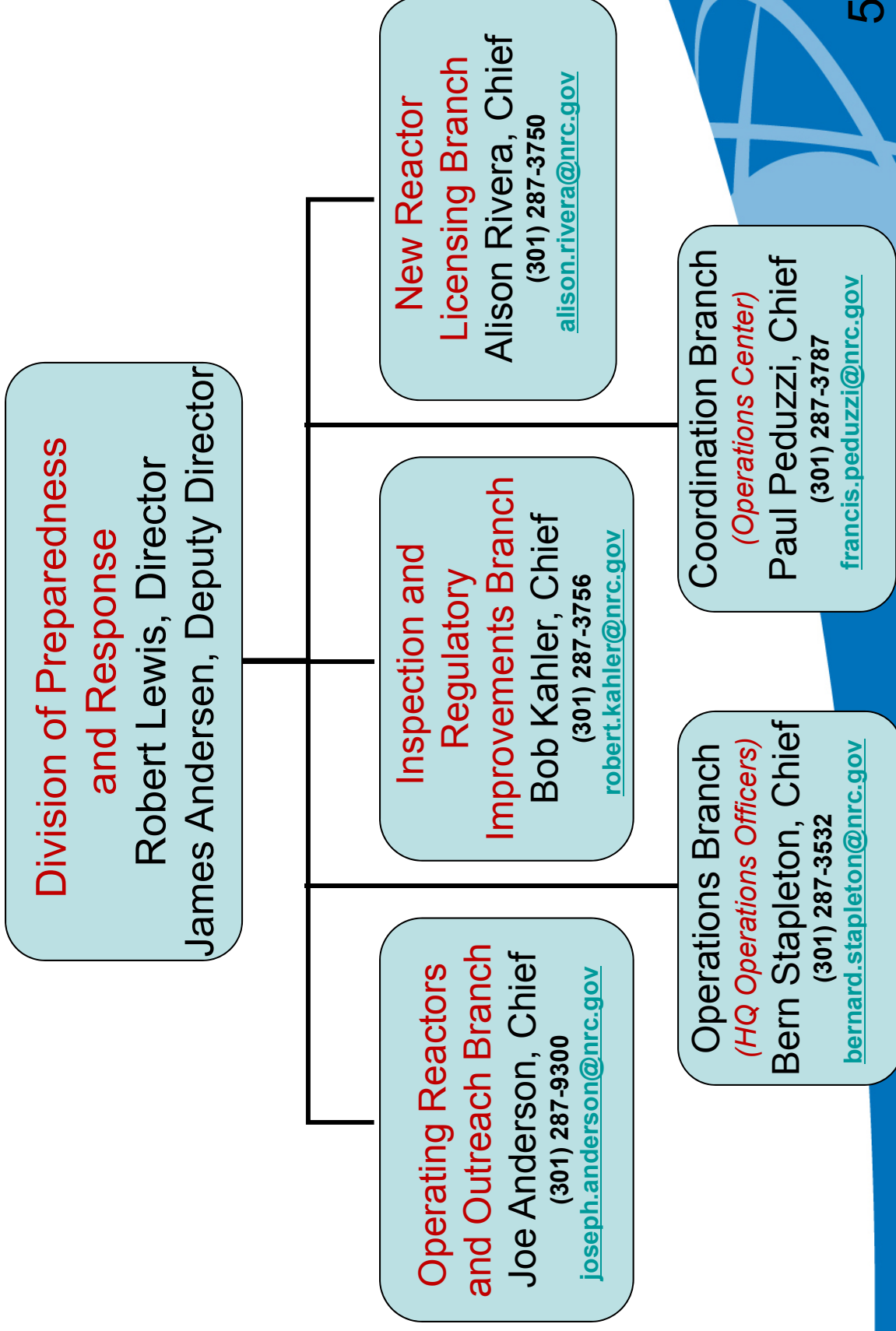
Office of the Secretary (SECY) of the Commission

- Notational (“Voting”): *Commission majority*
- Informational
- Staff Requirements Memorandum (SRM)

NSIR Organization



Division of Preparedness and Response



FEMA / NRC Coordination

Appendix A to 44 CFR 353

**“Memorandum of Understanding (MOU) Between the
Federal Emergency Management Agency (FEMA) and
the Nuclear Regulatory Commission (NRC)”**

Establishes framework of cooperation:

- Authorities and Responsibilities
- Areas of Cooperation
- NRC/FEMA Steering Committee on
Emergency Preparedness

FEMA / NRC MOU

FEMA Responsibilities:

- Lead for offsite emergency planning, including the review and assessment of offsite emergency plans and preparedness for adequacy

NRC Responsibilities:

- Assess licensee emergency plans for adequacy, and verify adequate implementation and maintenance
- Review FEMA findings and determinations as to whether offsite plans are adequate and can be implemented
- Decisions with regards to overall state of emergency preparedness (“Continued Reasonable Assurance”)

FEMA / NRC MOU

Areas of Cooperation:

- NRC licensing reviews
- FEMA review of offsite plans and preparedness
- Preparation for and evaluation of joint exercises
- Withdrawal of reasonable assurance finding
 - “120 day clock”
- Emergency planning and preparedness guidance

FEMA / NRC MOU

Areas of Cooperation:

- Support for document management system
- On-going NRC research and development programs
- Public information and education programs
- Recovery from disasters affecting offsite emergency preparedness
 - Disaster Initiated Reviews (*continued reasonable assurance*)

Disaster Initiated Review (DIR)

- A DIR is performed if:
 - A disaster damages the area around a licensed nuclear power plant to an extent that FEMA seriously questions the continued adequacy of offsite emergency preparedness
- Reaffirms radiological emergency preparedness capabilities of affected offsite jurisdictions located in the 10-mile EPZ
- **Not** intended as a comprehensive review of offsite plans and preparedness

Disaster Initiated Review (DIR)

- NRC Manual Chapter-1601
 - Outlines Headquarters and Regional roles and responsibilities for interfacing with FEMA and licensee
- FEMA Disaster Initiate Review Standard Operating Guide (SOG)
 - Disaster Initiated Review Team composition
 - Assessment of Offsite Capabilities Checklist
 - Focus on emergency response primary activities

- Provides option to assess impact of offsite EP infrastructure prior to initiating DIR
 - Disaster has impacted offsite EP infrastructure, but extent unknown
 - Intended to provide a “snap shot”
- Focus is FEMA/NRC interface at Regional level
- Not intended to replace or defer a DIR

Restart / Continued Operation

Must a NPP shutdown if FEMA determines there is significant damage to offsite EP infrastructure?

- A licensee is not required to immediately shutdown due to degraded offsite emergency infrastructure
- However, exceeding plant's technical specifications would require shutdown (e.g., loss of power due to degraded infrastructure)
- Commission can order shutdown if deficiencies of offsite EP will cause “immediate” health and safety concerns

Restart / Continued Operation

Must a licensee request NRC permission to restart?

- No requirement for licensee to get any specific reset authorization when a plant voluntarily and properly shuts down in compliance with NRC requirements
- Commission authorization is needed to restart if a licensee exceeded a “safety limit”
 - If a licensee wishes to restart, but the act of restart would create a non-compliance with NRC requirements or terms of the operating licensee, then the licensee may not restart

Regulatory Compliance vs. Industry Excellence

Ownership of “Site” Emergency Plan

Regulatory Review vs. Approval

- Regulation vs. Guidance (**Reg Guide / NUREG / FAQ**)
- Review:
 - Submitted under 10 CFR 50.4
 - Required by NRC regulations (54q, ETE update)
- Approval:
 - License Amendment (under 10 CFR 50.90)
 - License Exemption (under 10 CFR 50.12)
 - Biennial Exercise (RIS 2006-03)
 - Required by NRC regulations
 - **“Pre-submittal” call**

Regulatory Basis

- 10 CFR 50.90 (**amendment**) applies to licensees seeking to change their license conditions in how they comply with regulations
- 10 CFR 50.12 (**exemption**) applies to licensees seeking regulatory relief – no longer needs to comply with regulation
 - An exemption to the standards to 10 CFR 50.47(b) or the requirements of Appendix E to Part 50, which constitute a reduction in effectiveness, require Commission approval.

Reactor Oversight Process

Plant Assessment

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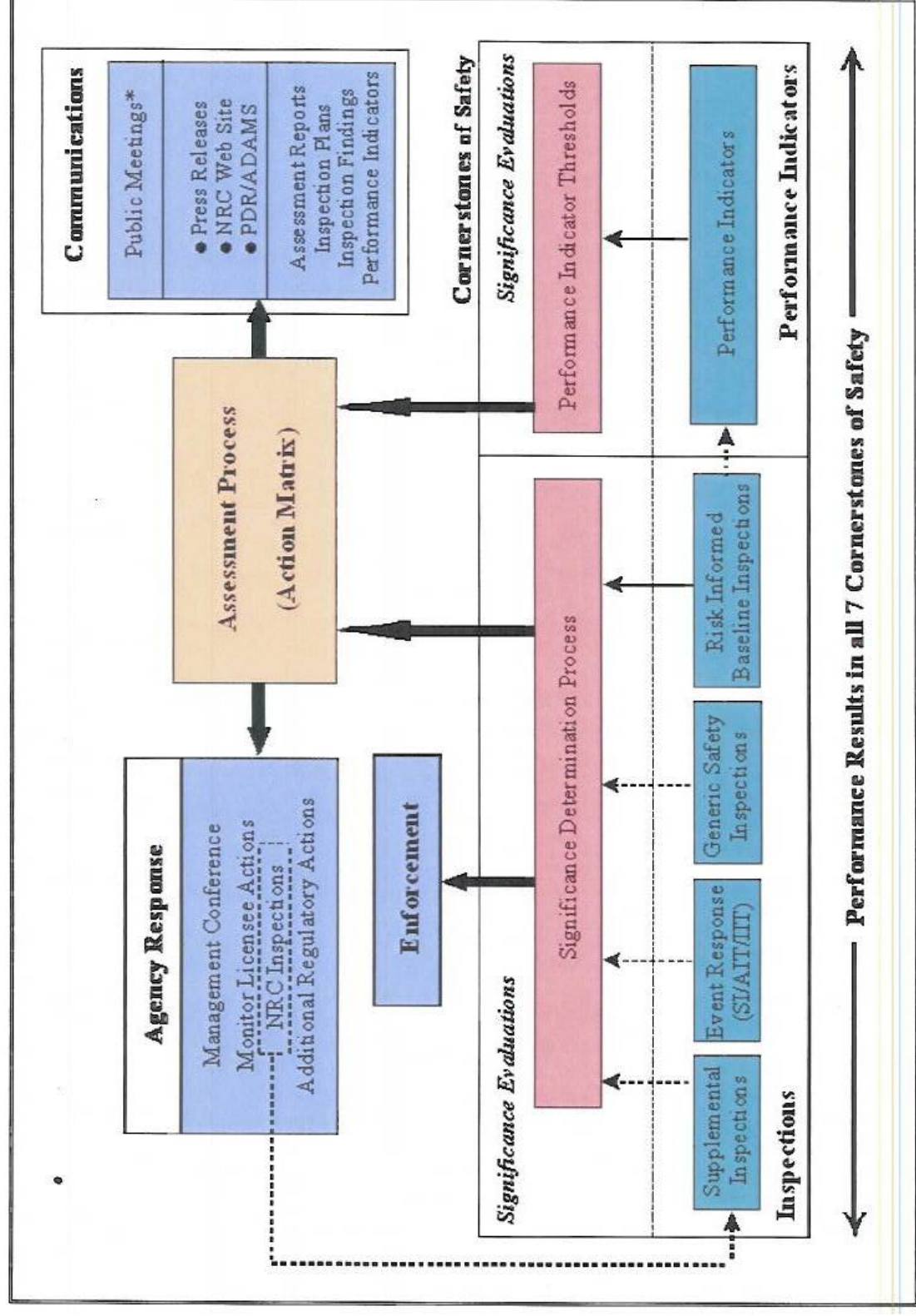
Performance Indicators

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Significance Determination Process

Q: Capability vs. Performance???

Reactor Oversight Process



Significant Determination Process

Manual Chapter 0609, Appendix B

Utilizes risk-informed qualitative analyses to estimate the risk significance of inspection findings related to licensee performance in meeting EP Cornerstone

- EP SDP is applied to findings only for the purposes of assigning a significance color

Significant Determination Process

- “Risk Significance” of Planning Standards
- Performance deficiency vs. weakness
- Failure to comply vs. implement
- Loss vs. degraded

Rulemaking Process

- Advanced Notice of Rulemaking
- Proposed Rule
- Final Rule

NRC Web Page

<http://www.nrc.gov/about-nrc/emerg-preparedness.html>

- | | <u>Key Topics</u> |
|---|--|
| • About Emergency Preparedness | |
| • About Emergency Response | • Emergency Preparedness Exercise Schedule |
| • How Can I Prepare for a Radiological Emergency? | • FEMA After Action Reports |
| • What Do I Do in a Nuclear Emergency? | • Emergency Action level Development |
| • Public Meetings and Workshops | • EP Frequently Asked Question Process |
| • Rulemaking Activities | |
| • Regulations, Guidance, and Generic Communications | |
| • Related Information and Other Resources | |
| • Newsletter | |

Incident Response Coordination

NRC's Incident Response Program

- Licensee Event Reporting to NRC
- NRC Senior Leaders Decision Maker Call
 - NRC Response Mode Decision
- NRC Operations Centers Activation

Incident Response Coordination

NRC's Incident Response Program (cont.)

- NRC Response Teams Overview
- NRC-INPO Liaison Position
 - Region II start
 - NRC HQ person assist (potential)
- Web EOC Board Sharing

Incident Response Coordination

Southern Exposure 2015

- Whole Community Concept
 - Federal Coordination Aspects
 - Federal Response Elements (FRMAC, IMAT)
- Unified Coordination Group
 - Attendance by Private Sector (1st Time)
- Funding/Indemnity
 - Price Anderson Act
 - Stafford Act

