

June 24, 2016

MEMORANDUM TO: Those on the Attached List

FROM: Marissa Bailey, Director */RA/*  
Division of Preparedness and Response  
Office of Nuclear Security and Incident Response

SUBJECT: INTERIM STAFF GUIDANCE FOR TI 2515/191 "INSPECTION OF THE IMPLEMENTATION OF MITIGATION STRATEGIES AND SPENT FUEL POOL INSTRUMENTATION ORDERS AND EMERGENCY PREPAREDNESS COMMUNICATION/ STAFFING/ MULTI-UNIT DOSE ASSESSMENT PLANS"

The following is interim staff guidance for completing Appendix C "Staffing and Communication Request for Information" to temporary instruction TI2515/191. The temporary instruction will be revised to incorporate the following discussion.

By letter dated March 12, 2012, the NRC issued a request for information pursuant to Title 10 of *the Code of Federal Regulations* (10 CFR) Part 50. 54(f) (50.54(f) letter). The request was issued as a part of implementing lessons learned from the Fukushima Dai-ichi event. Enclosure 5 to the 50.54(f) letter requested information associated with the Near-Term Task Force Recommendation 9.3 for emergency preparedness communications. Specifically, the letter requested licensees submit an assessment of their current communications systems and equipment used during a beyond design basis large scale natural phenomena emergency event resulting in an extended loss of all ac power (ELAP) to all site units, and impeded access to the site. The 50.54(f) letter cites 10 CFR 50.47(b)(6) and Appendix E, Section IV.E.9 as the applicable regulations that describe the licensee's emergency plan communications systems requirements. The communications systems used by licensees to meet these regulations are the communication systems to be considered in the requested assessment. The intent of the communications assessment was to determine what, if any, enhancements would be needed for onsite (e.g., radios for response teams and between facilities) and off-site (e.g., cellular telephones and satellite telephones) communications systems used in support of required mitigative response actions during a multi-unit ELAP event to ensure continual communications availability.

Accordingly, any communication capability enhancement made by a licensee in response to the assessment does not need to meet the 10 CFR 50 Appendix E communications system required design capabilities or testing frequencies described for primary and backup onsite and offsite communications systems. In other words, any enhanced communications system, equipment or power supply implemented is not required to be able to notify OROs within 15 minutes of an emergency declaration or meet the monthly communications testing requirement for contiguous State/local governments within the plume exposure pathway.

CONTACT: Eric Schrader, NSIR/DPR  
(301) 287-3789

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**ADAMS Accession No.: ML16111B049.** (Memo)

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DATE	05/17/2016	05/19/2016	06/23/2016

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MEMORANDUM TO THOSE ON THE ATTACHED LIST DATED:  
SUBJECT: INSPECTION PROCEDURE DOCUMENTS FOR COMMENT

[Raymond K](#) Lorson, Director, Division of Reactor Safety  
[Michael L](#) Scott, Director, Division of Reactor Projects  
[Mark E](#) Franke, Director, Division of Reactor Projects  
[Anthony T Jr](#) Gody, Director, Division of Reactor Safety  
[Patrick L](#) Loudon, Director, Division of Reactor Projects  
[Kenneth G](#). O'Brien, Division of Reactor Safety  
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[Anton](#) Vogel Director, Division of Reactor Safety  
Scott A. Morris Director, Division of Inspection and Regional Support

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