

Focused Self-Assessment of the Emergency Preparedness Significance Determination Process

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Purpose

- On December 12, 2017, the Nuclear Energy Institute (NEI) submitted a letter entitled, “Recommendations for Improving the Emergency Preparedness Significance Determination Process” (Agencywide Documents Access and Management (ADAMS) Accession No. ML17354A094).
- The Nuclear Regulatory Commission (NRC) responded via letter dated February 7, 2018, entitled “Receipt of Nuclear Energy Institute Recommendations for Improving the Emergency Preparedness Significance Determination Process” (ADAMS Accession No. ML18024A427).
 - In the letter to NEI, the NRC documents our intent to “...take a fresh look at the EP SDP” and to “...convene an expert team to evaluate the EP SDP based on the NRC’s experience with the EP SDP as well as inputs from external stakeholders.”
- During calendar year (CY) 2018, an expert team (consisting of selected NRC Regional and HQ staff) conducted an FSA in accordance with Inspection Manual Chapter (IMC) 0307, “Reactor Oversight Process Self-Assessment Programs.”
 - This FSA consisted of procedural reviews, EP Inspector surveys, and review of external stakeholder comments and/or suggestions. The Reactor Oversight Process (ROP) held regularly scheduled meetings between staff and external stakeholders which were used to provide updates on the status of this FSA.
- As part of the process, a public meeting was held on June 25, 2018 to begin the FSA. Today’s public meeting is intended to provide our tentative results and plan going forward.

FSA Team

- FSA Team
 - Clay Johnson: SES Oversight
 - Don Johnson, Senior EP Specialist: FSA Team Lead
 - Josephine Ambrosini, Senior Inspector-RI
 - Steve Sanchez, Senior Inspector-RII
 - Gregg Hansen, Senior Inspector-RIII
 - Paul Elkmann, Senior Inspector-RIV
 - Eric Schrader, EP Specialist-HQ
 - Ray Gibson, EP Specialist-HQ
 - Alex Garmoe, NRR/DIRS/IRAB

NRC Transformation Initiative

- Transformative ideas were captured and reviewed for possible consideration throughout the FSA process.
 - This was a point of emphasis during the June 25, 2018 Public Meeting.

FSA Draft Report

- FSA Draft Conclusion
 - The EP SDP is sound. However, the FSA Team, and FSA results, show that there are several areas where the NRC should consider enhancement opportunities.
 - These enhancement opportunities are to be considered preliminary, not a final NRC position, and subject to change. The dates provided are estimated and resources have not been prioritized yet.

FSA Draft Report

- Enhancement Opportunities
 - Create an Outlook E-mail account specifically used for knowledge management purposes and to drive consistency and awareness between the Regions and NRC HQ.
 - COMPLETED
 - Develop tools in SharePoint to document and track issues.
 - COMPLETED
 - Develop tools in SharePoint to coordinate Regional and HQ EP resources.
 - COMPLETED
 - Have HQ EP Specialists, assigned to Inspection and Oversight, be qualified as EP Inspectors.
 - Working. Two of the staff are qualified, the remaining staff member will be qualified in 2019.
 - Formalize an annual EP OE Report to capture lessons-learned and other EP issues relevant to the ROP and SDP.
 - COMPLETED. The OE report will be generated at the end of each FY.

FSA Draft Report

- Draft Enhancement Opportunities
 - Consideration of the other Reactor Safety Cornerstones when determining the significance of an EP issue.
 - Revise applicable Inspection Manual Chapters (IMCs) and Inspection Procedures (IPs) and provide to NRR: 8/2019.
 - Have issues related to the following planning standards (PS) be able to be “Greater than Green” (GTG): 10 CFR 50.47(b)(2, 4, 5, 8, 9, and the offsite part of 10).
 - Revise applicable IMCs and IPs and provide to NRR: 8/2019.

FSA Draft Report

- **Draft Enhancement Opportunities**
 - Make the following PS's the only ones that require a formal 10 CFR 50.54(q) change review, and subsequent requirement for NRC prior approval: 10 CFR 50.47(b)(2, 4, 5, 8, 9, and the offsite part of 10).
 - Revise applicable IMCs and IPs and provide to NRR: 8/2019.
 - Rulemaking, if necessary: 2/2020
 - Eliminate EP from Problem Identification and Resolution (P&IR) Inspections and only have it in the EP Baseline Inspection Program.
 - Revise applicable IMCs and IPs and provide to NRR: 8/2019.
 - Eliminate the ANS-PI and replace it with a PI for emergency response facility readiness.
 - Revise applicable IMCs and IPs and provide to NRR: 8/2019.

FSA Draft Report

- Draft Enhancement Opportunities
 - Add PIs to the EP ROP to support a 24-month 10 CFR 50.54(t) audit frequency.
 - Revise applicable IMCs and IPs and provide to NRR: 10/2019.
 - Consolidate existing procedures as much as possible.
 - Revise applicable IMCs and IPs and provide to NRR: 8/2019.
 - Add guidance to better risk inform: EALs, dose assessment modeling, 10 CFR 50.54(q), Fission Barrier Matrix, and Radiation Monitoring Instrumentation.
 - Revise applicable IMCs and IPs and provide to NRR: 8/2019.
 - Improve hours-tracking and available sorting tools.
 - Revise applicable tools and provide recommendation(s) to NRR: 10/2019.

FSA Draft Report

- Draft Enhancement Opportunities
 - Revise the Standard Review Plan.
 - Draft completed 12/2019.
 - Enhance guidance for evaluating meteorology and SCBA (joint issue for EP and RP).
 - Revise applicable IMCs and IPs and provide to NRR: 12/2019.
 - Revise DEP-PI guidance to clarify expectations.
 - Revise applicable IMCs and IPs and provide to NRR: 8/2019.
 - Revise SDP examples to ensure significance aligns with public risk.
 - Revise applicable IMCs and IPs and provide to NRR: 8/2019.

FSA Draft Report

- Draft Enhancement Opportunities
 - Review EP Inspector qualification program, and associated courses, for enhancement opportunities.
 - Revise IMC 1245 and associated coursework: 11/2019.

Contacts

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