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September 9, 2019

Mr. Robert Kahler
Chief, Policy and Oversight Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NEI White Paper, "Implementing a 24-Month Frequency for Emergency Preparedness Program Reviews"

Dear Mr. Kahler:

The Nuclear Energy Institute¹ and representatives of member companies have developed the attached white paper to provide guidance that may be used by a licensee to conduct periodic emergency preparedness program reviews at a 24-month frequency as allowed by 10 CFR 50.54(t)(1)(ii). The guidance in the white paper reflects information found in the following U.S. Nuclear Regulatory Commission (NRC) documents:

- "Results of the Calendar Year 2018 Reactor Oversight Process Focused Self-Assessment on the Emergency Preparedness Significance Determination Process," dated February 1, 2019 (ML18331A374)
- SECY-19-0067, "Recommendations for Enhancing the Reactor Oversight Process," dated June 28, 2019 (ML19070A036)

The proposed guidance was also informed by discussions with NRC staff in several public meetings related to the above documents.

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting its members, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, suppliers and nuclear materials licensees, nuclear medicine and radiopharmaceutical companies, companies using nuclear technologies in the agricultural, food, and industrial sectors, universities and research laboratories, law firms, labor unions, and international electric utilities.

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NEI requests a review of the white paper followed by a discussion of any staff comments in a public meeting. The white paper will be revised to address the comments and then re-submitted for endorsement as Revision 0.

If you have questions or require additional information, please contact me at (202) 739-8127 or dly@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Young', with a long horizontal flourish extending to the right.

David L. Young

Attachment

c: Mr. Clay Johnson, NSIR/DPR, NRC