



NEI White Paper, *Implementing a
24-Month Frequency for Emergency
Preparedness Program Reviews*

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NRC Public Meeting

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White Paper Purpose

- Provides guidance for adopting the voluntary option of conducting periodic emergency preparedness (EP) program reviews at a 24-month frequency as allowed by 10 CFR 50.54(t)(1)(ii)
 - Addresses the criteria and monitoring necessary to meet the regulatory requirements permitting a 24-month review period; not intended to provide methods or instructions for conducting an EP program review
- Use would be voluntary, and other approaches to meeting the 24-month review requirements may also be acceptable

NEI White Paper, Draft Revision D

- Submitted on 9/9/19
 - Requested NRC review followed by a discussion of staff comments in a public meeting
- Staff comments were discussed during a public meeting on 10/29/19
- White paper revised to address staff comments and submitted on 11/22/19, as Revision 0
 - Requesting NRC endorsement

Changes to Address NRC Comments

- Removed the option for assessing the adequacy of State and local interfaces through assessment of drill or exercise performance
- For definition of a change adversely affecting EP, replaced the criterion of a precluded (lost) EP function with identification of a “reduction in effectiveness” without prior NRC approval
- For Emergency Response Facility and Equipment Readiness (ERFER) indicator, replaced threshold based on 10 CFR 50.72 reports with one based on loss of an RSPS function (>24 hours with no comp measure)
- Editorial changes to improve readability

Questions/Discussion