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Docket: NRC-2021-0042

Emergency Response Planning and Preparedness for Nuclear Power Reactors

Comment On: NRC-2021-0042-0001

Emergency Response Planning and Preparedness for Nuclear Power Reactors

Document: NRC-2021-0042-DRAFT-0003

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General Comment

NEI Comments on Draft Regulatory Guide DG-1357, "Emergency Response Planning and Preparedness for Nuclear Power Reactors" [Docket ID NRC-2021-0042]

Attachments

NEI Comments on Draft Regulatory Guide DG-1357 'Emergency Response Planning and Preparedness for Nuclear Power Reactors' (Docket ID NRC-2021-0042)

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April 15, 2021

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ATTN: Program Management, Announcements and Editing Staff

Subject: NEI Comments on Draft Regulatory Guide DG-1357, "Emergency Response Planning and Preparedness for Nuclear Power Reactors" [Docket ID NRC-2021-0042]

Program Management, Announcements and Editing Staff:

The Nuclear Energy Institute¹ (NEI) appreciates the opportunity to provide comments on the subject draft Regulatory Guide to the U.S. Nuclear Regulatory Commission (NRC) staff. As an overarching comment, NEI and our members support the changes contained in the document. We are also offering the following specific comment for staff consideration.

On page 6, the document refers to the previous NRC endorsement of Appendix A, "Drill and Exercise Objectives," to NEI 06-04, "Conducting a Hostile Action-Based Emergency Response Drill," Revision 2, issued July 2011. NEI has since revised NEI 06-04 to incorporate lessons learned from the first cycle of hostile action-based exercises; see Revision 3, issued September 2016, which was provided to the NRC staff in an email dated March 5, 2021. Footnote 4 of this revision states, "The generic HAB drill and exercise objectives presented in Attachment A of NEI 06-04, Revision 2, were endorsed for licensee use by the NRC staff; refer to NRC ADAMS ML112570092 and ML112570074. The objectives presented in Attachment A of this document, Revision 3, are unchanged from those in Revision 2." We therefore recommend that DG-1357 be revised to include an endorsement of the drill and exercise objectives presented in Appendix A of NEI 06-04, Revision 3.

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.

Program Management, Announcements and Editing Staff

April 15, 2021

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Should you 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

c: Mr. Robert Kahler, NSIR/DPR/POB
Mr. Charles Murray, NSIR/DPR/POB