

**FAQ 21-03, R1: Reporting ANS Data Following a Transition to IPAWS
Tentatively Approved**

Plant: Generic

Date of Event: N/A

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Performance Indicator: EP03 – Alert and Notification System (ANS) Reliability

Site-Specific FAQ (see Appendix D)? () Yes or (X) No

FAQ to Become Effective: When Approved

Question Section

Event or circumstances requiring guidance interpretation:

The Federal Emergency Management Agency (FEMA) has issued policy guidance indicating that the Integrated Public Alert and Warning System (IPAWS) may be used by a State, Tribal, and Local government as a primary or backup means of public alerting and notification; refer to FEMA memorandum, “IPAWS Implementation Guidance,” dated September 13, 2017. A description of IPAWS may be found at the FEMA website¹. Some sites, in conjunction with their offsite response organization (ORO) partners, have replaced, or intend to replace, their siren-based primary public alerting method with a method based on IPAWS (i.e., sirens would no longer be part of the primary public alerting method). The Alert and Notification System (ANS) Reliability performance indicator (i.e., the ANS PI) “monitors the reliability” of a site’s ANS through a determination of “the percentage of the sirens that are capable of performing their safety function based on regularly scheduled tests.” This FAQ clarifies the applicability of the ANS PI to a site with a FEMA-approved primary public alerting method that does not use sirens in any fashion (e.g., the site has implemented IPAWS for prompt public alerting and retired their siren system).

If licensee and NRC resident/region do not agree on the facts and circumstances, explain:

Not applicable to this FAQ.

Potentially relevant FAQs: None

Response Section

Proposed Resolution of FAQ:

10 CFR 50, Appendix E, Section IV.D states, “. . . The design objective of the prompt public alert and notification system shall be to have the capability to essentially complete the initial alerting and initiate notification of the public within the plume exposure pathway EPZ within about 15 minutes;” and “The alerting and notification capability shall additionally include administrative and physical means for a backup method of public alerting and notification capable of being used in the event the primary method of alerting and notification is unavailable during an emergency to alert or notify all or portions of the plume exposure pathway EPZ population.” Included is a requirement that, “The backup method shall have the capability to alert and notify the public within the plume exposure pathway EPZ, but does not need to meet the 15-minute design objective for the primary prompt public alert and notification system.” In 76 Fed. Reg. 72560, “Enhancements to Emergency Preparedness Regulations,” dated November 23, 2011, the NRC states, “The intent of the final rule is not to have a duplicate primary ANS, but to have a means of backup alerting and notification in place so the public can be alerted in sufficient time to allow offsite

¹ <https://www.fema.gov/emergency-managers/practitioners/integrated-public-alert-warning-system>

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officials to consider a range of protective actions for the public to take in the event of a severe accident with potential offsite radiological consequences.”

With respect to the ANS performance indicator, NEI 99-02, “Regulatory Assessment Performance Indicator Guideline,” Revision 7², states on page 60, “This indicator monitors the reliability of the offsite Alert and Notification System (ANS), a critical link for alerting and notifying the public of the need to take protective actions. It provides the percentage of the sirens that are capable of performing their safety function based on regularly scheduled tests.” The associated Clarifying Notes include, “For those sites that do not have sirens, the performance of the licensee’s alert and notification system will be evaluated through the NRC baseline inspection program. A site that does not have sirens does not report data for this indicator.” It should be noted that monitoring of ANS Reliability data formally began with implementation of the Reactor Oversight Process in April, 2000. At that time, there was no regulatory requirement for a backup method of public alerting and notification.

From the above discussion, it is clear that the ANS performance indicator applies to sirens used as a primary method to accomplish prompt public alerting (i.e., complete the initial alerting of the public within the plume exposure pathway EPZ within about 15 minutes). Upon implementation of a FEMA-approved ANS with a primary public alerting method that does not use sirens (e.g., one based on IPAWS), the ANS PI would no longer be applicable to the site because sirens, the technology that underlies the indicator, are no longer part of the primary prompt public ANS. The licensee can stop reporting siren test data beginning with the quarter during which sirens are removed as a primary method for accomplishing prompt public alerting. Thereafter, the performance of the licensee’s ANS will be evaluated through the NRC baseline inspection program (e.g., NRC Inspection Procedure 71114.02, “Alert and Notification System Evaluation”) and/or other methods determined by the NRC in conjunction with FEMA.

If appropriate, provide proposed rewording of guidance for inclusion in next revision:

On page 61 replace this text on lines 2-4:

~~For those sites that do not have sirens, the performance of the licensee’s alert and notification system will be evaluated through the NRC baseline inspection program. A site that does not have sirens does not report data for this indicator.~~

with the following:

A site with a FEMA-approved primary public alerting method(s) that does not use sirens in any fashion does not report data for this indicator and may stop reporting data beginning with the quarter the method is implemented (e.g., replacement of sirens with IPAWS). In this case, the licensee’s ANS will be evaluated through the NRC baseline inspection program. When reporting ROP Cornerstone PI data, a licensee that does not use sirens as the primary public alerting method should leave the ANS PI data fields blank (i.e., no entries) and add a comment stating: “Sirens are not part of the site’s primary ANS. ANS will be inspected via IP 71114.02.”

PRA update required to implement this FAQ? No.

MSPI Basis Document update required to implement this FAQ? No.

² “Line-in/Line-out” version available in ADAMS with accession number ML13261A116.