

Conference of Radiation Control Program
Directors (CRCPD)
Committee on Commercial Nuclear Power
Comments on Proposed Rulemaking:
“Reporting Requirements for Nonemergency
Events at Nuclear Power Plants”

Jeff Semancik
Committee Chair
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States' Interests

- States recognize the authority of the NRC for regulation of nuclear power facilities, but also...
 - maintain a very serious interest in radiological matters that could affect the health and safety of the public and the natural resources of the states
 - committed to maintain independence and transparency of the regulatory oversight process
 - committed to the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the implementation and enforcement of environmental laws, regulations, and policies

Role of the Committee on Commercial Nuclear Power

- CRCPD is a nonprofit professional organization whose membership consists of state and local radiation control officials and others interested in the work of radiation protection in the public interest
- The Committee on Commercial Nuclear Power (E-47) was recently formed to serve as a single point of contact to provide feedback of states' interests on reactor topics to the NRC
 - Foster two-way communication between CRCPD and NRR
 - Serves as a channel for communicating concerns and interests
 - Attend public meetings and conferences to represent CRCPD

§ 50.72 Reports are Important to States

- Prompt Non-emergency reports
 - Identify significant events to Offsite Stakeholders
 - With potential significant public health and safety implications
 - Indicative of significant licensee performance lapses
 - Provide risk significant information to inform states and offsite organizations
 - Demonstrate a commitment to independence and transparency of the regulatory oversight process

CRCPD Response to NRC's Request for Additional Public Input

Keep States Informed

- State and Local Radiation Control Program and Emergency Management Organizations receive event notifications
 - Identify conditions important to the health and safety of the public
 - § 50.72(b)(3)(xii), involving the transport of a radioactively contaminated person to an offsite medical facility
 - § 50.72(b)(3)(xiii), involving a major loss of emergency assessment capability, offsite response capability, or offsite communications capability
 - Identify potential issues that could cause significant escalation of emergency events
 - Loss of safety function
 - Unanalyzed condition
 - Failure of safety systems

Timeliness is Important

- Replacing prompt reports with 60-day reports is not sufficient
 - States need may need to take actions offsite
 - Offsite samples and measurements
 - Emergency response can be informed by information
 - Should an emergency occur, offsite response is informed by degradation of safety

Effort commensurate with Safety Significance

- As a formerly NRC licensed Senior Reactor Operator and Shift Manager, my experience is:
 - Addressing losses of safety function, safety system actuations, etc. is not a burden – it is an obligation
 - Reporting requirements are properly risk informed
 - Communications are simple
 - Not burden for only rare occurrences

Transparency is the best interests of the public

- Transparency demonstrates performance
- Transparency ensures licensee and NRC are publicly accountable for resolving issues
 - Repeated out of service of radiation monitors used to measure offsite releases in an emergency. In order to reduce repeated notifications, licensee resolved equipment issues and instituted an effective alternative method
 - Repeated reports related to degradation of the control building barrier resulted in licensee changing design to prevent the loss of the control room boundary safety function
- State and public concern for events currently reportable seems appropriate

More than a “courtesy call”

- The petitioner asserted that reports pursuant to § 50.72(b)(2)(xi) represent a courtesy call
 - However, these reports are only required for issues related to health and safety of public or protection of the environment
 - ...§ 50.72(b)(2)(xi) “Any event or situation, **related to the health and safety of the public** or onsite personnel, **or protection of the environment**, for which a news release is planned or notification to other government agencies has been or will be made.
 - Such an event may include an onsite **fatality or inadvertent release of radioactively**
 - States may want to take independent actions
 - Engage with NRC directly to express interests of the state
 - Conduct confirmatory offsite measurements in the event of a release
 - For example, drinking water monitoring
 - Understand potential impacts to offsite environmental monitoring

State and Local stakeholders should have meaningful input

- All events are local - Municipalities must deal with impacts
- Rulemaking on public notifications and any consideration of alternatives should involve meaningful interaction with the state and local organizations
 - Meaningful engagement minimizes inadvertent consequences
 - CRCPD Working Group on Commercial Nuclear Power can provide consensus input and local insights
 - Governor appointed State Liaison Officers can also provide input
- Any alternatives should include ***timely*** notification of state authorities and the public

Thank you for your time

Jeff Semancik
Chair E-47