

NRC Presentation Slides on NEI Remote Response White Paper, Draft C NRC Staff Comments & Discussion Items for December 15, 2021, Public Meeting

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NRC COMMENTS	DISCUSSION ITEMS	PAGE LOCATION
1. Comment	Definition of "remote response" is embedded in a paragraph.	Page 4, Background
2. Comment	Would licensees that have approved ERO response times that are greater than that recommended in NUREG-0654 propose shorter ERO augmentation times based on "quicker response times?"	Page 4, Background, First and Fourth Bullets
3.	Will the emergency plans and related implementation procedures be changed to reflect the larger ERO response?	Page 4, Background, Fourth Bullet
4.	How will it be shown that a remote responder can adequately fulfill all applicable ERO functions? Will this white paper provide a method to demonstrate the capability for remote responders to fulfill all applicable ERO functions?	Page 4, Background, Last Sentence
5.	The general approach bullets do not appear to be consistent. The first seems to relate to site-specific emergency plans and the second could imply that if a licensee provides the capability indicated in NUREG-0654, that proposed changes will not be a reduction in effectiveness. For each position recommended for remote response: Do we know what responsibilities are performed by those ERO responders? Are ERO responsibilities specifically identified with sufficient granularity to determine what functions are performed by ERO responders? Typical emergency plans are high level documents that would have an engineer respond to provide engineering coverage related to a specific discipline. That statement does not really describe what an engineer must do to provide that coverage. Without that description, you cannot adequately justify moving that person to a remote location and simply state, "since the engineer would be available by phone, the engineering coverage ERO function is met."	Page 5, General Approach Bullets

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6.	Considering that remote response will not provide the same communications options and capabilities of in-center response, it is not clear to the NRC staff how, "[t]here will be no reduction in the effectiveness of the ERO to respond to an emergency.	Page 5, General Approach Bullets
7. Comment	The NRC staff agrees with the ERO or ERF command and control statement in the first paragraph. However, is this command and control for overall ERO command and control or the control of each ERF facility? These could be two different answers reflecting different capabilities.	Page 6, Recommended Positions, First Paragraph
8.	<p>There are several recommended positions for a remote response that appear to be either leadership or liaison positions. Both the regional EP inspectors and HQ had comments on these positions.</p> <ul style="list-style-type: none"> • Since the definition of a liaison would be someone who "facilitates a close working relationship between people or organizations," it is not clear to the NRC staff how a close working relationship could be effectively performed using a remote responder. The key difference is that the facilitation would require one organization to call the liaison who would then have to call the other organization. Currently, the liaison could be in direct contact, face-to-face, with one organization while talking to the other organization remotely. This appears far more effective than the remote liaison version. The remote liaison version could reasonably result in the organizations communicating directly to avoid introduced communication inefficiencies. • Although the NEI White Paper states that leadership positions are not typically candidates for remote response, the Recommended Positions for Remote Response includes positions that would reasonably be considered as leadership positions. There is a difference in the effectiveness of in-center communications and remote communications. Additionally, it appears that placing leaders in remote locations effectively changes their roles from a leadership position to a responsible individual. 	<p>Page 6, Recommended Positions</p> <p>Page 6, Recommended Positions, Last Paragraph</p>

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9.	<p>What does a Site Radiation Protection Coordinator actually do? Is this different from a Radiation Protection Manager? Are both required?</p> <p>Note: licensees typically make arguments for ERO staffing changes based on the generic descriptions in guidance and not based on their current emergency plan. If both of these positions are currently identified in a site-specific emergency plan, then a licensee must consider the potential impact of changes of either or both positions if remote response is being considered.</p>	Page 6, Positions 1 and 2
10.	<p>How is the Dose Assessment function at a NPP performed?</p> <p>The RP supervisor typically directly works with Dose Assessment Staff and then reports to the ED. This proposed list of ERO functions implies that they are individual pieces and not parts of an integrated team. How will you ensure that the team still functions properly? Do we have an analysis that shows how/what the ERO actually that the dose assessment, as proposed, would be effective?</p>	Page 6, Position 3
11. Comment	<p>What does the engineering support staff do and when do they need to do it? Are there any areas that are already successfully performed by phone (aka remotely) during normal operations and outages?</p>	Page 6, Position 4

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12.	<p>When are Security Liaison capabilities required? What does this individual actually do? Are these capabilities redundant to position(s) identified in site-specific security plans? Does the Security Liaison position require access to safeguards information and encrypted communications? If so, how will access to safeguards information and encrypted communications be provided remotely?</p>	Page 6, Position 5
13. Comment	<p>Since several sites are already using a remote IT support group and others do not have critical digital assets identified per 10 CFR 73.54, either elimination of this capability or remote capability for this function already has precedent. There were several regional EP inspector comments regarding remote IT Lead responders. The comments mostly questioned to ability to repair equipment remotely or how remote IT support would be effective if communications were lost.</p>	Page 6, Position 6
14.	<p>NUREG-0654 already has a note that JIC/JIS staff to address media inquiries does not need to be performed at the TSC/OSC but needs to be established at 60 minutes, with additional JIC/JIS staff responding to the EOF within 60 minutes of a SAE. Will an individual be available in the EOF to support the ED? If not, why is it acceptable to not provide at least one individual in the EOF to provide media information support?</p>	Page 6, Position 7
15.	<p>Need a clear definition of "reasonably similar." Additionally, the inclusion of "or between ERFs" does not appear appropriate as a standard for acceptable communication because ERFs are already "remote" from one another and these communications are not typically face-to-face.</p>	Page 6, Remote Collaboration Platform, First Paragraph

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16.	Need some sort of guide rails for remote collaboration platform analysis. As written, a licensee could state that we did an analysis, and it looks good to us. We asked each of individuals and they all said that an operating phone is all that is needed.	Page 6, Remote Collaboration Platform, Second Paragraph
17.	How is the site-specific collaboration platform capability that supports remote ERO augmentation tested/evaluated?	Page 7, Remote Collaboration Platform, First Paragraph after Bullets
18. Comment	By their nature, suggestions are not required. May be cleaner to use one designation such as, "sites should consider," which would also be appropriate for non-required suggestions.	Page 7, Remote Collaboration Platform, Third Paragraph after Bullets
19. Comment	I would keep it simple and just ensure that resources identified in the emergency plan can be engaged as needed. The focus should be on those organizations that are included in site-specific emergency plans.	Page 7, Remote Collaboration Platform, Fourth Paragraph after Bullets
20. Comment	A separate "requirement" to perform software updates appears to be embedded in this "example."	Page 8, Specialized Applications Last Paragraph
21. Comment	Care must be exercised with the use of examples because they wind up overwriting the actual guidance.	Page 8, Specialized Applications Last Paragraph

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22. Comment	There appears to be overlap with Response Time and Facility Activation comments and comments for Call-out and Response sections. It seems that it would be more appropriate to place related comments in the Call-out and Response section.	Page 8, Response Time and Facility Activation.
23.	<p>Although the white paper does recommend that sites should implement reasonable control to ensure the availability of remote responders and implement compensatory measures in the event of a loss of capability to respond, no additional guidance other than these high-level statements were provided. Similar comments were made by both the Regional EP NRC inspectors and NRC HQ.</p> <ul style="list-style-type: none"> • Specific guidance is needed to ensure there is no confusion regarding expected ERO augmentation that includes remote responders for certain positions. The white paper should provide sufficient guidance to ensure that implementation of remote responders would not result in inconsistency or delays in ERO augmentation. • Specific guidance is needed to ensure that site implementing remote augmentation of certain ERO positions have well defined contingency plans that will ensure that the inability to establish communication or the loss of communication with a remote responder is promptly identified and pre-planned compensatory actions are in place. 	Page 9, Call-out and Response
24. Comment	The last two sentences of the first paragraph seem focused and appropriate. All other information in this section, including the flowchart, lacks focus and/or appears unnecessary.	Page 9, Call-out and Response First Paragraph
25.	<p>The flowchart describes two steps that must be taken if communications are lost with a remote responder. The first step is for the remote responder who lost communications to communicate with the site ERO. The second step is to take a compensatory action. It does not appear that a flowchart is necessary.</p> <p>If a flowchart is deemed necessary, it should be given a cold read by someone not involved in the development of the flowchart.</p>	Page 10, Flowchart

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26.	It is not apparent that all/most licensees have developed a task analysis that identified the site-specific knowledges, skills, and abilities to implement their emergency plans. As such, it may be difficult to identify changes to the existing emergency plan task analysis as a result of remote response for certain ERO augmenting responders. If the intent of the Training and Qualification section is to determine the training needs for remote response, this section should provide a high-level outline that supports identifying training needs. This section should also provide guidance on training evaluation and documentation.	Page 11, Training and Qualification
27. Comment	The Testing and Maintenance section seems similar/redundant to the Equipment/Hardware section.	Page 11, Testing and Maintenance
Recommend that NEI focus efforts on considering overall ERO staffing based on current emergency response capabilities. This would include FLEX, 10 CFR 50.155, and other relevant changes since Table B-1 of NUREG-0654, Revision 2, was published for comment.		