

Emergency Preparedness Final Rule Implementation

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Topics

- Emergency Preparedness Rule Background
- Emergency Preparedness Rule Topics
- Guidance Documents



EP Rulemaking: Brief Background

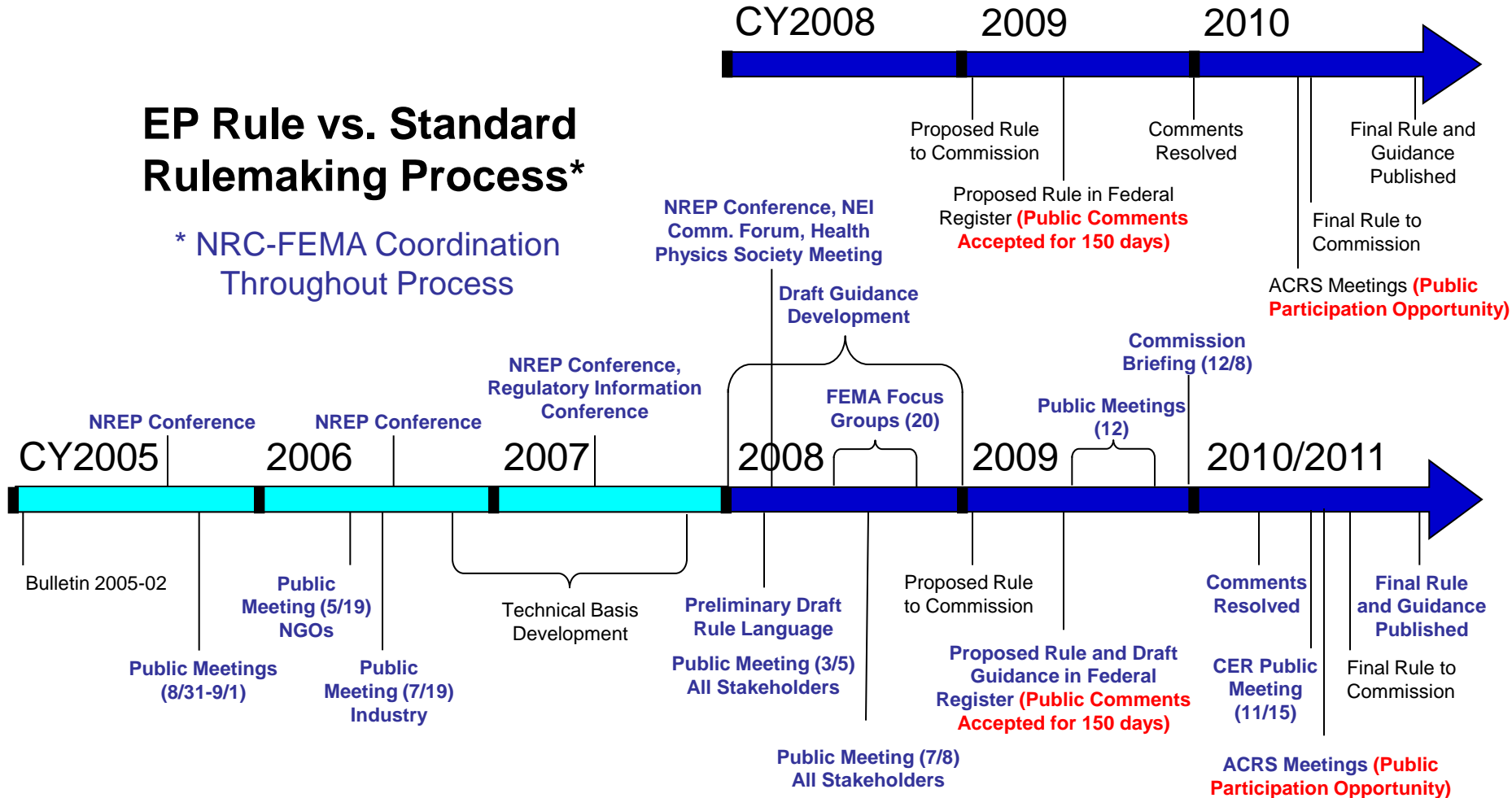
- Post 9/11 Enhancements
- Comprehensive Review
- 2005 – 2008 Public Meetings
- 2009 – 150 Day Comment Period
 - 12 Public Meetings – 6 Locations
- Comment Resolution
- Draft Final Rule Language Public



EP Rule Background

EP Rule vs. Standard Rulemaking Process*

* NRC-FEMA Coordination Throughout Process



EP Rule Summary

#	RULEMAKING TOPIC	GUIDANCE
1	On-Shift Multiple Responsibilities	NSIR/DPR-ISG-01
2	Emergency Action Levels for Hostile Action	NEI 99-01, Rev. 5
3	Emergency Response Organization Augmentation and Alternative Facilities	NSIR/DPR-ISG-01
4	Licensee Coordination with Offsite Response Organizations	NSIR/DPR-ISG-01
5	Protection for Onsite Personnel	NSIR/DPR-ISG-01
6	Challenging Drills and Exercises	NSIR/DPR-ISG-01
7	Backup Means for Alert and Notification Systems	NSIR/DPR-ISG-01
8	Emergency Declaration Timeliness	NSIR/DPR-ISG-01
9	Emergency Operations Facility – Performance-Based Approach	NSIR/DPR-ISG-01
10	Evacuation Time Estimate Updating	NUREG/CR-7002
11	Amended Emergency Plan Change Process	Reg. Guide 1.219
12	Removal of Completed One-Time Requirements	N/A

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Guidance Documents: Background & Summary

- NUREG/CR-700 2, “Criteria for Development of Evacuation Time Estimate Studies”
- Regulatory Guide 1.219, “Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors”
- NSIR/DPR-ISG-01, “Interim Staff Guidance Emergency Planning for Nuclear Power Plants”
- NUREG-0654/FEMA-REP-1, Supplement 3, “Guidance for Protective Action Strategies”



EP Rule Implementation Dates

EP RULE TOPIC	EP RULE TOPIC IMPLEMENTATION DATE
EP Rule Publication Date	November 23, 2011
EP Rule Effective Date	December 23, 2011 (implementation dates are referenced to effective date)
Amended Emergency Plan Change Process	Licensees must comply with new requirements in 50.54(q)(4) and 50.54(q)(5) for 50.54(q)-related submittals to the NRC after February 21, 2012 (60 days)
Evacuation Time Estimate Updating	Within 365 days of the later of the date of availability of most recent decennial census data from the U.S. Census Bureau or December 23, 2011 (effective date)
Licensee Coordination with Offsite Response Organizations	June 23, 2014 (30 months)
On-Shift Staffing Analysis	December 24, 2012 (365 days) to perform staffing analysis within 30 days of completing staffing analysis to implement interim compensatory measures within 24 months of completing staffing analysis to complete long-term corrective actions
Emergency Action Levels for Hostile Action	June 20, 2012 (180 days)
Emergency Declaration Timeliness	June 20, 2012 (180 days)

EP Rule Implementation Dates

EP RULE TOPIC	EP RULE TOPIC IMPLEMENTATION DATE
Alert and Notification System Backup Means	<p>Two implementation periods apply:</p> <ol style="list-style-type: none"> 1) For a site with existing FEMA-approved ANS backup means in ANS design report on December 23, 2011, backup alert and notification means must be implemented by December 24, 2012 (12 months) 2) If the alert and notification design report does not include a backup alert and notification capability or needs revision to ensure adequate backup alert and notification capability, then a revision of the alert and notification design report must be submitted to FEMA for review by June 24, 2013 (18 months), and the FEMA-approved backup alert and notification means must be implemented within 365 days after FEMA approval. However, the total time period to implement a FEMA-approved backup alert and notification means must not exceed June 22, 2015 (3 years, 6 months)
Emergency Operations Facility – Performance-Based Approach	June 20, 2012 (180 days)
Emergency Response Organization Augmentation at Alternative Facility	<p>Two implementation periods apply:</p> <ol style="list-style-type: none"> 1) June 20, 2012 (180 days) – staging area and communications capability 2) December 23, 2014 (36 months) – all capabilities to include offsite notifications, engineering assessment, damage control team preparation
Challenging Drills and Exercises	<ol style="list-style-type: none"> 1) Licensees shall conduct an HAB exercise for each of their sites by 12/31/15. 2) States should fully participate in one HAB exercise by 12/31/15. 3) The initial 8-year exercise cycle for a site begins in the year the HAB exercise is conducted. For a site licensed under Part 52, the initial 8-year exercise cycle begins in the year of the initial exercise.
Protective Actions for Onsite Personnel	June 20, 2012 (180 days)

NOTE: Each applicant for a combined license or early site permit under 10 CFR Part 52 whose application is docketed before the effective date of the final rule may defer compliance with any change to the EP regulations under the final rule until after receipt of the license or permit. If that applicant chooses to defer compliance, it shall subsequently amend the combined license or early site permit to comply with those changes no later than December 31, 2013. (Reference 10 CFR Part 50, Appendix E, Section I.5.)

NRC EP Frequently Asked Question (FAQ) Process

- Generic questions about existing EP guidance documents
- NEI expected to coordinate submittal of industry generic issues
- EP FAQ Website:
 - <http://www.nrc.gov/about-nrc/emerg-preparedness/faq.html>
 - Point of Contact:
 - Mike Norris, Team Leader (NRC EP FAQ Coordinator)
 - (301) 415-4098, mike.norris@nrc.gov



Contact

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Emergency Management Webinar

Radiological Emergency Preparedness Program Manual

July 2012



FEMA

Purpose

- Single Source that provides contemporary REP Guidance
- Amplifies planning standards and evaluation criteria in regulatory guidelines:
 - NUREG-06564/FEMA0REP-1, Rev. 1
- Aligns FEMA offsite activities with NRC regulations and rulemaking activities.



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Programmatic Changes

DHS National Preparedness Initiatives

- National Incident Management System (NIMS)
- National Response Framework (NRF)
- National Preparedness Guidelines – HSEEP
- FEMA Comprehensive Preparedness Guide (CPG-101)
- Post Katrina Emergency Management Reform Act (PKEMRA)
- Scenario Enhancements
 - Hostile Actions
 - Radiological Release Variations



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Emerging Issues

- Aligning the offsite REP Program with national preparedness initiatives under Homeland Security Presidential Directive (HSPD)-5 and Presidential Policy Directive (PPD)-8
- Preparing for and responding to hostile action-based (HAB) incidents at NPPs
- Enhancing scenario realism and reducing negative training and pre-conditioned responses of exercise participants
- Ensuring backup means are in place for alert and notification systems



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HSEEP

- HSPD-8 established HSEEP as the official policy for all FEMA exercise activities
- Requires all federal exercises to adhere to the methodologies, terminology and documentation standards delineated within the HSEEP Reference Volumes
- REP Program exercises will use the HSEEP methodology and guidance for exercise program management, design, development, conduct, evaluation, and improvement planning



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NIMS/ICS

- HSPD-5 requires the Federal Departments and agencies to make the adoption of NIMS by OROs a condition for Federal preparedness assistance, through grants, contracts and other activities.
- HSPD-5 does not apply to private sector entities such as nuclear power plant licensees.
- Offsite response concepts based on ORO plans and procedures should be coordinated with licensee plans/procedures to ensure effective response and communications between the licensee and OROs.



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Hostile Action Based Scenarios

- HAB scenario starts the new 8-year exercise cycle
- The HAB scenario variable
- Coincide with either a release or no/minimal scenario variable
- Cannot include a no/minimal release option for consecutive HAB exercises at a particular site



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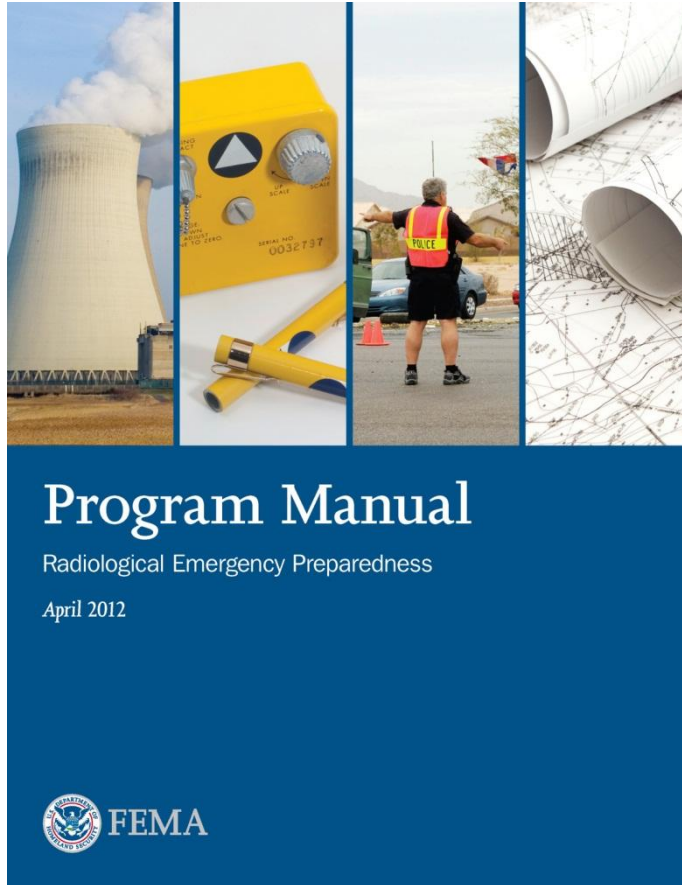
No/Minimal Release Scenario

- No radiological release or an unplanned minimal radiological release that requires the site to declare a Site Area Emergency, but does not require the declaration of a General Emergency



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REP Program Manual



- April 2012 Edition
- Updated Annually for the National Radiological Emergency Preparedness Conference
- Available Online
 - Online Manual
<https://www.fema.gov/library/viewRecord.do?id=5865>
 - FAQ
http://www.fema.gov/about/divisions/thd_repp.shtm



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