



Conference of Radiation Control Program Directors

Patrick Mulligan

HS/ER-5 Chair

Committee on Emergency Response Planning

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CRCPD Involvement

- CRCPD welcomes the opportunity to be part of the process to update and revise the basis document for emergency response planning and preparedness for operating commercial nuclear power plants in the U.S.
- CRCPD encourages both NRC and DHS/FEMA to continue to engage stakeholders in the process whenever possible to ensure the development of the most effective guidance document.
- The CRCPD is committed to providing time and resources to this very important project and will continue to support our federal partners.

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Getting Started

- NRC and FEMA should work together to develop a concept document that describes the scope and purpose of the NUREG-0654 revision.
- Revision Objectives should be clearly identified.
- The project scope and purpose must clearly delineate the intent of the document. There needs to be consensus between FEMA and NRC whether the document is guidance or regulation?

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Getting Started

- A project timeline should be developed that clearly identifies milestones, timelines and meeting schedules for stakeholder involvement.
- Every effort should be made to include state and local government stakeholders in the development process and not wait until a draft is published for comment.
- The ultimate goal of the project should be to improve nuclear emergency preparedness and response.
- All members of the development team should have a strong background and expertise in REP.

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CRCPD Recommendations

- The document should be revised to provide flexible guidance and criteria to assure longevity of the document.
- The revised guidance should ensure that all currently approved plans and procedures are still viable. (44 CFR 350 approval).
- The document should minimize language related to all hazards planning and focus on emergency preparedness for nuclear power plant responses.

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CRCPD Recommendations

- The planning basis should be reviewed and updated to reflect the most current studies, guidance, technologies and best practices. For example SOARCA needs to be considered in the planning basis.
- The document should reflect the changes made to the REP Program Manual and the NRC Rule Changes where appropriate.
- The document should reflect the changes that will need to be made to the REP Program Manual as a result of lessons learned from implementation and the FEMA FAQs developed from state and local inputs.

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CRCPD Recommendations

- The document should consider and incorporate important concepts and lessons learned from Japan's Fukushima response.
- The document should consider and incorporate as appropriate any rule or guidance changes NRC adopts as part of the Near Term Task Force.
- The document must be able to accommodate current and future technologies that may be applied to EP in order to allow for progress without changing the basis.
- Evaluation criteria should be focused on performance and outcomes.

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What is still Applicable?

- The current planning basis for the 10 mile plume exposure pathway and 50 mile ingestion planning pathway is still applicable.
- The 16 planning standards as they exist are still applicable. Additional standards should not be required. If, however, FEMA or NRC believe additional planning standards are needed, they should be properly vetted and discussed with state and local stakeholders prior to inclusion in the draft.

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What is **NOT** Applicable?

- Appendix 1, Emergency Action Level Guidelines for Nuclear Power Plants (Superseded by NEI 99-01 and NEI 07-01)
- Appendix 4, Evacuation Time Estimates within the Plume Exposure Pathway Emergency Planning Zone (Superseded by NUREG/CR-7002)
- Will Supplements be incorporated into the document or will they remain separate?

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What Needs to be Applicable?

- State of the Art Reactor Consequence Analysis (SOARCA).
- New technologies and application of public messaging systems and Joint Information Systems.
- Recognition of the role the federal response will play in a nuclear power plant response. The federal response needs to be included in the applicability column of the document.

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What Needs to be Applicable?

- Current dose modeling applications, field monitoring and reporting criteria and laboratory analysis that is reasonable and appropriate to the response (federal standards FRMAC and RAMS).
- Inclusion of applicable guidance that has been adopted over time to reduce the amount of extraneous reference documents.

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Process Forward

- Establish a mechanism to ensure that state and local government is included as part of the development team.
- Allow pre-draft comment period to gather input for the development of the document (beyond this initial kickoff).
- Provide regional/state workshops and public meetings to introduce the draft document.
- Provide ample time for stakeholder review and comment on the draft.

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Process Forward

- Provide response document to stakeholder comments along with cross references indicating the changes made between drafts.
- Consider holding a second round of public meetings if changes are significant between drafts.
- Provide a second comment period between the draft and final version after the comment adjudication document is released.

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Process Forward

- It is important to minimize changes or impacts to recently adopted NRC and FEMA rules and guidance.
- Provide ample and reasonable amount of time for implementation with support from both FEMA and NRC Regions and FEMA and NRC Headquarters to state and local organizations.

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Final Remarks

- The CRCPD on behalf of state stakeholders is looking forward to continued engagement and participation in this process as it moves forward.
- The CRCPD is encouraged by the efforts of both NRC and FEMA to engage in a transparent and open process that allows the input and expertise of those agencies responsible for the development and implementation of comprehensive nuclear emergency response plans.

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