

The Preliminary Capabilities Review/Disaster Initiated Review Process



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Panelists

- **Randall Hecht & JT Ackermann**

- FEMA Region IV



- **Eric White**

- Duke Energy Corporation

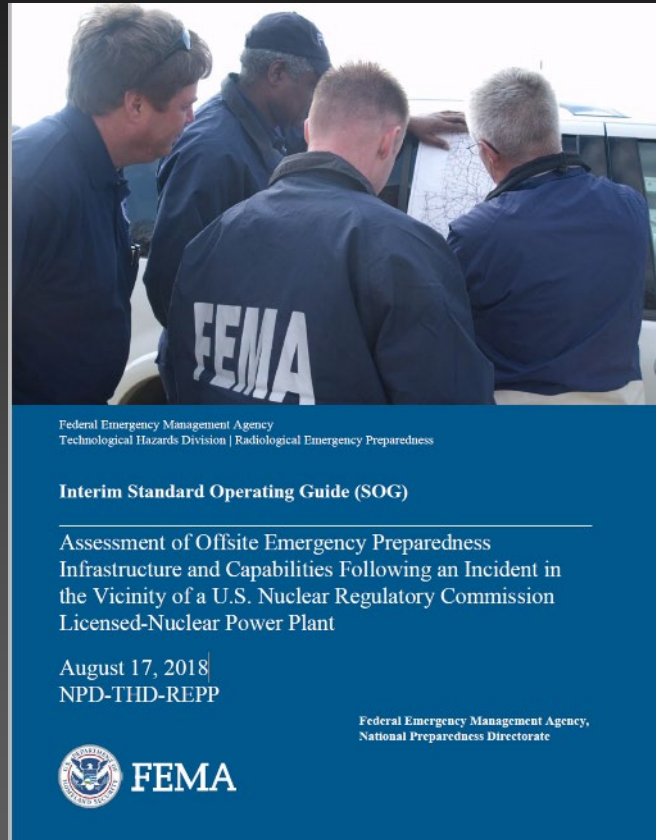


- **John M. Pelchat**

- NRC Region II



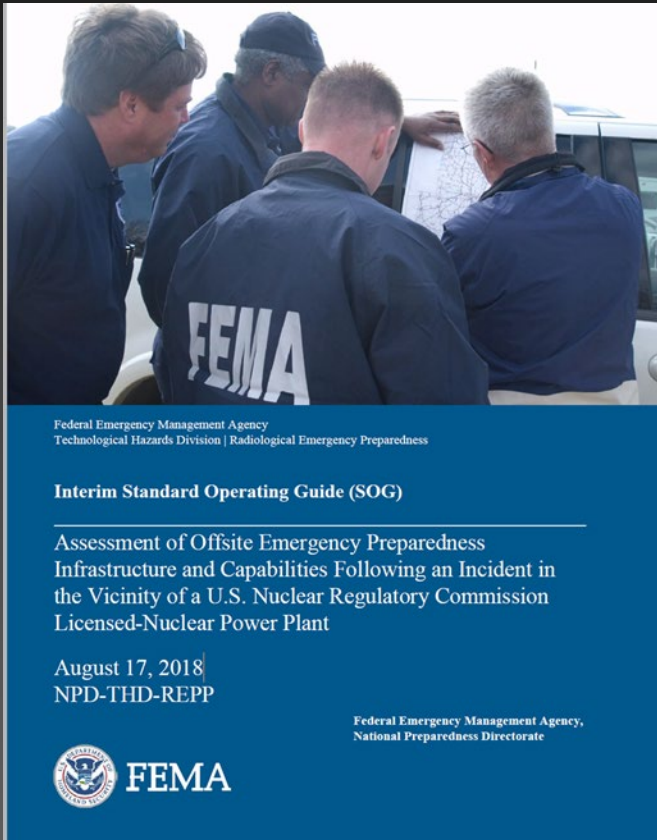
FEMA Standard Operating Guide



- Guidelines for
 - Preliminary Capabilities Assessment (PCA)
 - Disaster Initiated Review (DIR)



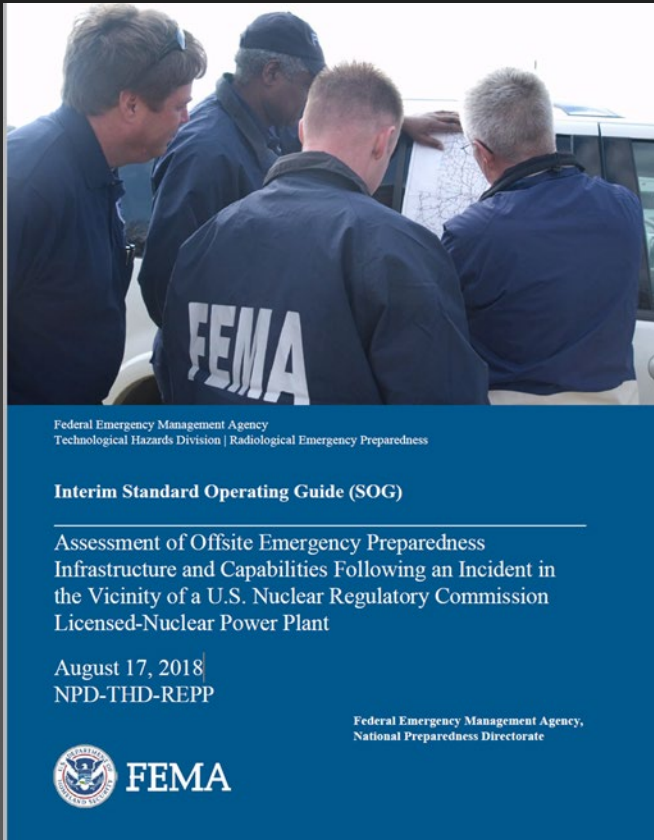
FEMA Standard Operating Guide



- **Preliminary Capabilities Assessment (PCA)**
- ...obtain a prompt assessment (snapshot) of offsite Emergency Preparedness (EP) immediately following an incident to assist the ... determination on the need and timing for a DIR.



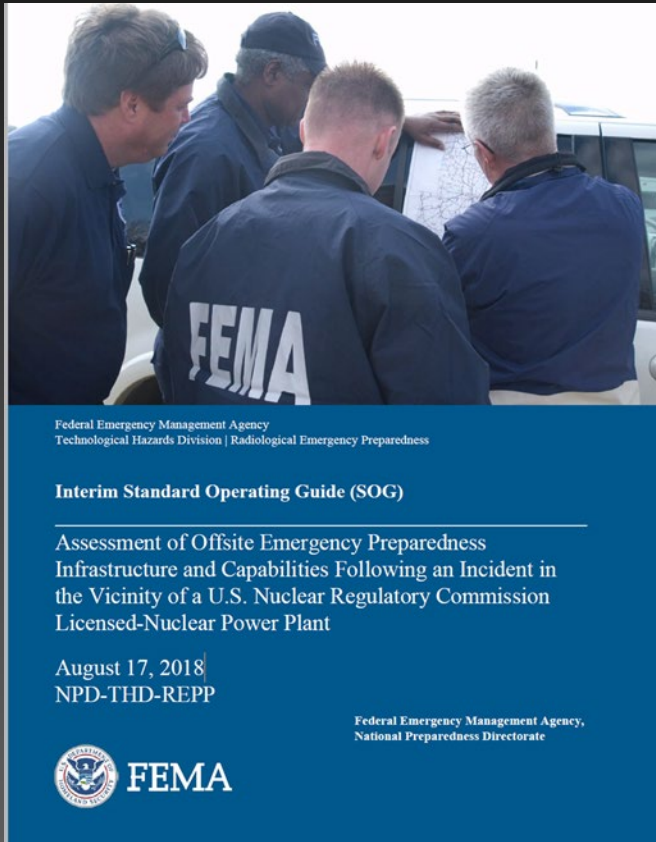
FEMA Standard Operating Guide



- **Disaster Initiated Review (DIR)**
 - Determine offsite ORO capabilities to effectively implement emergency plans.
 - It is not a comprehensive review of offsite plans and preparation.



FEMA Standard Operating Guide



- If FEMA's review finds that offsite emergency response infrastructure and capabilities do not provide reasonable assurance, & the NPP continues to operate, then such a finding would be handled by the NRC under 10 CFR § 50.54(s)(2)(ii) and (3).



10 CFR § 50.54(s)(2)

- NRC will determine whether the reactor shall be shut down until such deficiencies are remedied:
 - if NRC finds that the state of emergency preparedness does not provide reasonable assurance; and,
 - if the deficiencies are not corrected within four months of that finding.



10 CFR § 50.54(s)(3)

- **NRC will base its finding on:**
 - a review of the FEMA findings as to whether State and local emergency plans are adequate and capable of being implemented; and,
 - NRC's assessment as to whether the licensee's emergency plans are adequate and can be implemented.



NRC Inspection Manual Chapter 1601

- Guidance for coordination between the NRC and the FEMA in determining the adequacy of offsite emergency plans and preparedness in response to a natural disaster or event.

NRC INSPECTION MANUAL

NSIR/DPR

INSPECTION MANUAL CHAPTER 1601

COMMUNICATION AND COORDINATION PROTOCOL FOR DETERMINING THE STATUS
OF OFFSITE EMERGENCY PREPAREDNESS

Effective Date: July 1, 2018



NRC Inspection Manual Chapter 1601

A plant is not required under 10 CFR 50.54(s)(2)(ii) to immediately shut down due to degraded offsite emergency response infrastructure or response capabilities, as long as the reactor continues to operate within its Technical Specification safety limits.



NRC Inspection Manual Chapter 1601

- If a licensee wishes to restart, but the act of restarting would create a non-compliance with NRC requirements or terms of the operating license, then the licensee may not restart without prior Commission approval.”
- This includes the licensee verifying it can implement its onsite emergency plan.



NRC Inspection Manual Chapter 1601

- “The NRC staff would then have to justify that the deficiencies in offsite EP will cause an immediate public health and safety concern to support consideration by the Commission of an order to shut down, or prevent the restart of the unit(s).”

NRC INSPECTION MANUAL

NSIR/DPR

INSPECTION MANUAL CHAPTER 1601

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IMC 1601: Bottom Line

- In general, decision making by licensees and the NRC in these matters should be governed by common sense and conservative judgement ***with public health and safety as the overriding consideration.***

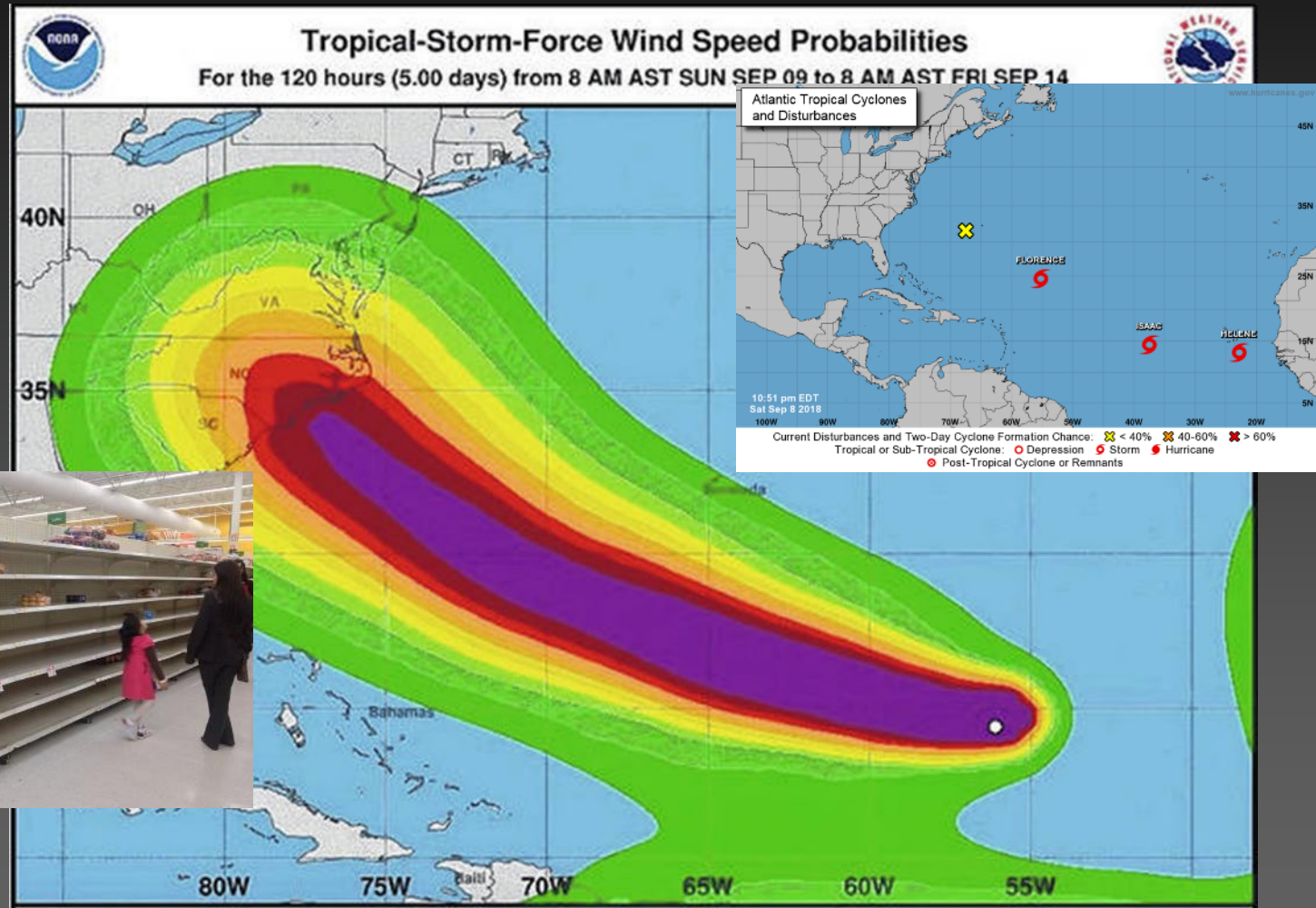


Before We Need It

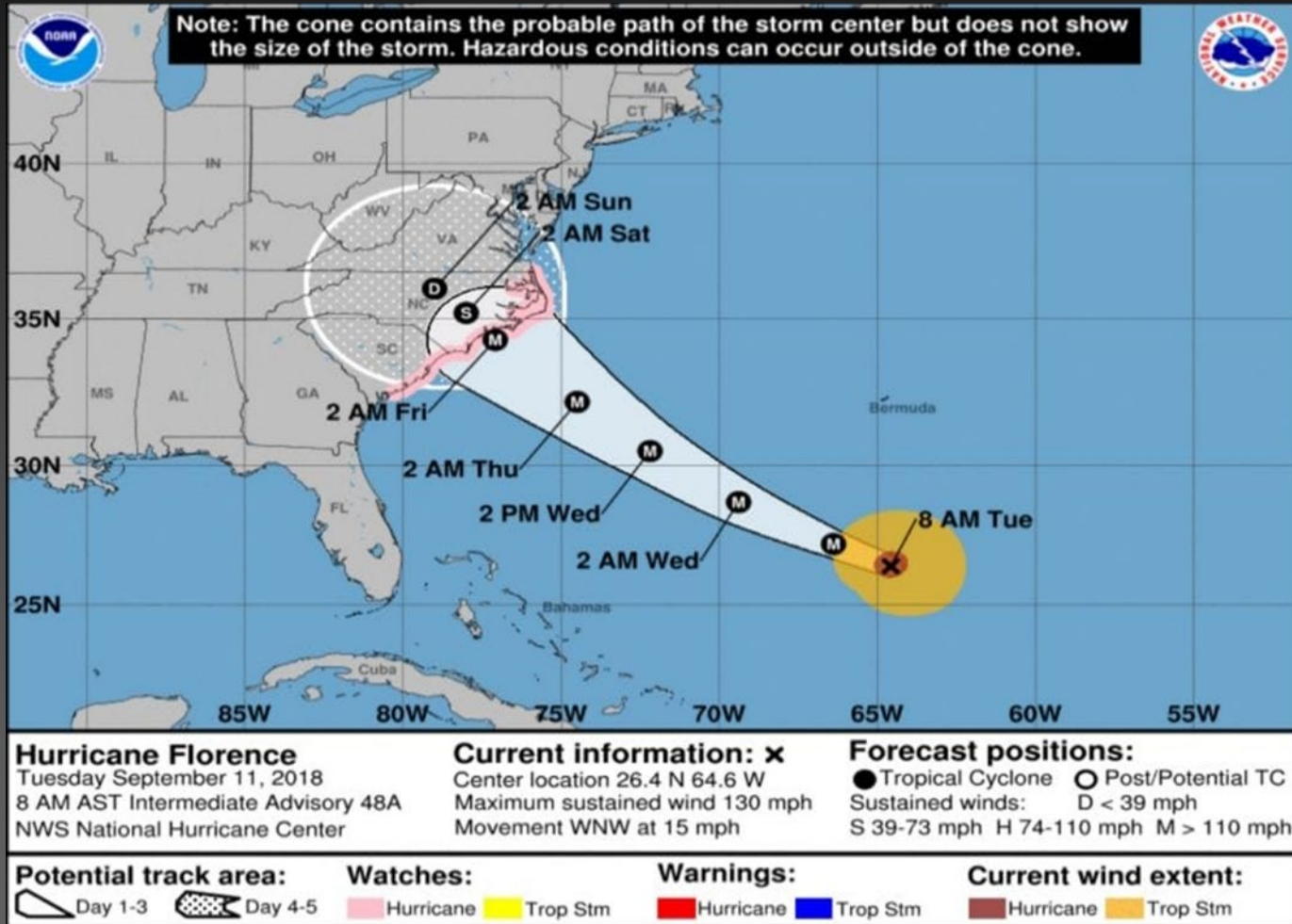
- **Pre-hurricane season briefing**
 - Utility site & fleet leadership
 - State & County emergency management
 - NRC Resident Inspectors & Regional State Liaison Officers
 - FEMA Regional Assistance (RAC) Chair
- **Tabletop or Walk-Throughs**



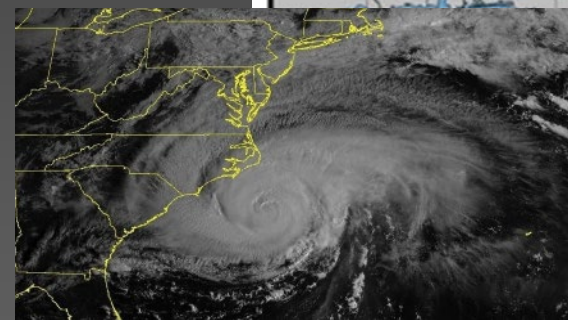
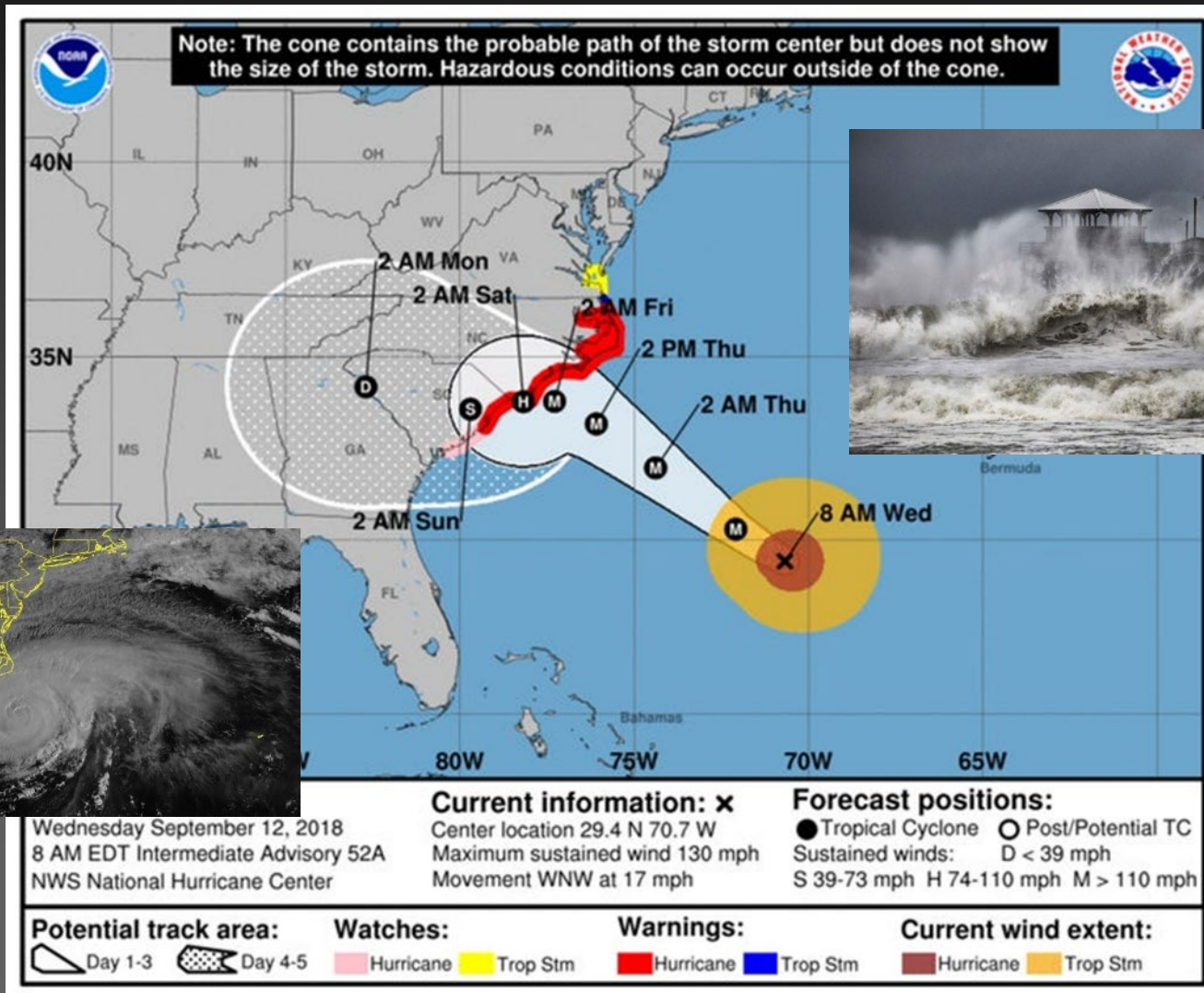
120 – 72 Hours Prior to Impact



72 – 48 Hours Prior to Impact



48 – 0 hours Prior to Impact



0 – 24 Hours Post Impact



Preliminary Capabilities Assessment

- Has an emergency been declared?
- Condition of offsite emergency response facilities?
- Is any ERO, critical to support unavailable?
- Impacts on facilities for people with disabilities & access/functional needs?



PCA (continued)

- Initial infrastructure assessment of the facility, state, & tribal and local risk and support counties
- Are EPZ counties and state capable of implementing protective actions?
- Are communication systems inoperable?
- Are evacuation routes impeded?

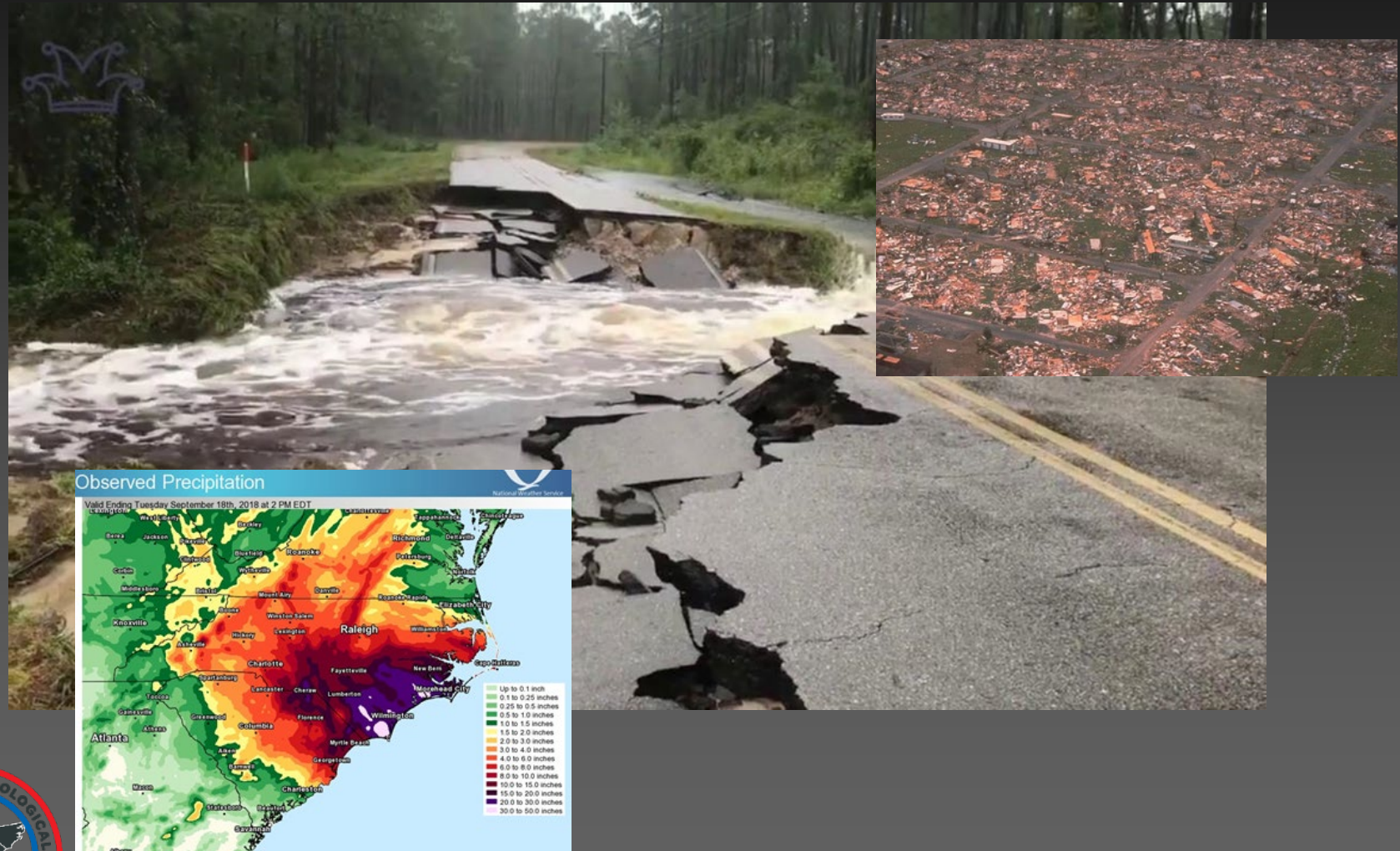


PCA (continued)

- Are critical support facilities unavailable?
- What compensatory measures are in place?
- Are EPZ counties and state capable of implementing protective actions?
- Answers are used to determine if a Disaster Initiated Review needed to learn more



24- 48 Hours Post Impact



Evaluations Continue



Summary

- The processes are for all natural and man-made disasters
- Preparation with tabletop or meeting pre-event
- Communications prior to and during the event
- We all have the same goal – protect the health and safety of the public



QUESTIONS?

