



U.S. NUCLEAR REGULATORY COMMISSION

STANDARD REVIEW PLAN

OFFICE OF NUCLEAR REACTOR REGULATION

13.3 EMERGENCY PLANNING

REVIEW RESPONSIBILITIES

Primary - ~~Emergency Preparedness Licensing Branch (EPLB), OIE~~ Emergency Preparedness and Radiation Protection Branch (PERB)¹

Secondary - None

I. AREAS OF REVIEW

The applicant's emergency planning, as described in his² safety analysis report (SAR), is reviewed by ~~EPLB of the Division of Emergency Preparedness of the Office of Inspection and Enforcement~~ the Emergency Preparedness and Radiation Protection Branch (PERB).³ This primary review responsibility involves evaluation of evidence of preliminary planning (in the Preliminary Safety Analysis Report, PSAR) or substantive evidence of planning (in the Final Safety Analysis Report, FSAR) for emergency preparedness directed at situations involving real or potential radiological hazards. Review of an application for a design certification will only address those design features, facilities, functions, and equipment that may affect some aspect of emergency planning or the capability of a licensee to cope with plant emergencies.⁴ The review is made against requirements in 10 CFR Part 50, Appendix E; and the planning standards described in 10 CFR Part 50, 50.47(b) and the specific criteria given in the guidance document "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (NUREG-0654 Revision 1) and "Functional Criteria for Emergency Response Facilities" (NUREG-0696).⁵

~~In addition, the review at the OL stage includes a review of the FEMA findings on the state of preparedness of offsite authorities with responsibility for taking protective measures in the plume exposure pathway EPZ and the ingestion exposure pathway EPZ.~~⁶

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USNRC STANDARD REVIEW PLAN

Standard review plans are prepared for the guidance of the Office of Nuclear Reactor Regulation staff responsible for the review of applications to construct and operate nuclear power plants. These documents are made available to the public as part of the Commission's policy to inform the nuclear industry and the general public of regulatory procedures and policies. Standard review plans are not substitutes for regulatory guides or the Commission's regulations and compliance with them is not required. The standard review plan sections are keyed to the Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants. Not all sections of the Standard Format have a corresponding review plan.

Published standard review plans will be revised periodically, as appropriate, to accommodate comments and to reflect new information and experience.

Comments and suggestions for improvement will be considered and should be sent to the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Washington, D.C. 20555.

Although EPLB has the overall review responsibility for emergency preparedness, certain aspects of technical reviews will be performed by or through the Emergency Preparedness Development Branch (EPDB). Examples of these areas are meteorological information, The review addresses plans for onsite and offsite emergency response activities and specifically examines emergency planning zones (EPZs), emergency action levels, emergency response facilities, and evacuation time estimates. ~~EPLB will coordinate with EPDB on these reviews.~~⁷

In addition, the review at the OL stage includes a review of the Federal Emergency Management Agency (FEMA) findings on the state of preparedness of State and local governments with responsibility for taking protective measures in the plume exposure pathway EPZ and the ingestion exposure pathway EPZ.⁸

Review Interfaces:

The PERB also performs the following reviews under the SRP sections indicated:

1. The PERB reviews meteorological information, including atmosphere diffusion estimates, as part of its primary review responsibility for SRP Sections 2.3.1 through 2.3.5.⁹
2. The PERB reviews provisions for accident protection as part of its primary review responsibility for SRP Section 12.3-12.4.¹⁰

In addition, the PERB will coordinate with other branches' evaluations that interface with the overall review of emergency planning as follows:¹¹

1. The Civil Engineering and Geosciences Branch (ECGB) reviews the exclusion area, including provisions for control of activities in the exclusion area in the event of an emergency, and provisions to control traffic in the exclusion area if the area is traversed by a transportation corridor as part of its primary review responsibility for SRP Section 2.1.2. In addition, the ECGB reviews the population distribution and use characteristics of the exclusion area and the accidental releases of liquid effluents in ground and surface waters as part of its primary review responsibility for SRP Sections 2.1.3 and 2.4.13 respectively.¹²
2. The Plant Systems Branch (SPLB) reviews the applicant's provisions for protection of the control room during an emergency as part of its primary responsibility for SRP Section 6.4.¹³
3. The Instrumentation & Controls Branch (HICB) reviews information systems important to safety, including instrumentation to assess plant conditions during and following an accident and information systems associated with emergency response facilities, as part of its primary review responsibility for SRP Section 7.5. Their review includes meteorological instrumentation and the SPDS. The HICB also reviews those portions of the applicant's communications systems used in intra-plant and plant-to-offsite

communications during accident conditions as part of its primary review responsibility for SRP Section 9.5.2.¹⁴

4. The Materials and Chemical Engineering Branch (EMCB) reviews post-accident sampling systems as part of its primary review responsibility for SRP Section 9.3.2.¹⁵
5. The Human Factors Assessment Branch (HHFB) reviews the training programs as part of its primary review responsibility for SRP Sections 13.2.1 and 13.2.2. The HHFB also reviews human factors related aspects of the emergency response facility features (e.g., SPDS, meteorological instrumentation, communications/information systems, facility arrangement/environment, etc.) to verify that good HFE principles have been or will be taken into account in their design as part of its primary review responsibility for SRP Section 18.0 (proposed).¹⁶

II. ACCEPTANCE CRITERIA¹⁷

The acceptance criteria for the overall status of an applicant's emergency preparedness are as follows:

1. 10 CFR 50.47 as it relates to emergency planning and preparedness.¹⁸
2. 10 CFR Part 50, Appendix E, as it relates to emergency planning and response and the Emergency Response Data System (ERDS).¹⁹

Specific criteria necessary to meet the relevant requirements of 10 CFR 50, Sections 50.47 and Appendix E are as follows:

- A. For those applicants subject to 10 CFR 50.34(f), 10 CFR 50.34(f)(2)(iv) requires that an applicant seeking an operating license shall provide an SPDS in both the TSC and EOF (TMI item I.D.2). The SPDS displays the minimum set of plant parameters needed to define the safety status of the plant and is capable of indicating when process limits are being approached or exceeded. Supplement Number 1 to NUREG-0737 (Reference 13) provides additional guidance regarding the SPDS (the SPDS is reviewed under SRP Sections 7.5 and 18.2).²⁰
- B. For those licensees subject to 10 CFR 50.34(f), guidance relating to the design and implementation of emergency response facilities (e.g. TSC, OSC and EOF) is presented in Appendix B to NUREG-0718 Rev. 2 (Reference 12) and Supplement Number 1 to NUREG-0737. Compliance with TMI Task Item III.A.1.2 can be demonstrated by following the guidelines presented in these documents.^{21 22}
- C. The onsite and, except as provided in 10 CFR 50.47(d), offsite emergency response plans for nuclear power reactors must meet the standards established in 10 CFR 50.47(b). Specific guidance in NUREG-0654 (FEMA-REP-1) Rev. 1 (Reference 9) establishes the basis for NRC licensees, and State and local governments to develop radiological emergency plans and improve emergency preparedness.²³

As required by 10 CFR 50.47(b)(1) the primary responsibilities for emergency response by the nuclear facility licensee, and by State and local organizations within the Emergency Planning Zones (EPZs), must be established. The size of the EPZ for a nuclear power plant shall be determined in relation to local emergency response needs and capabilities. Acceptable guidance relating to the definition of EPZs is presented in NUREG-0396 (EPA 520/1-78-016) (Reference 8).²⁴

- D. Where an applicant for an operating license asserts that its inability to demonstrate compliance with the requirements of 10 CFR 50.47(b) results wholly or substantially from the decision of State and/or local governments to not participate in emergency planning, an operating license may be issued if the applicant demonstrates those elements listed in 10 CFR 50.47(c)(1)(i)-(iii). Further guidance relating to the development, review, and evaluation of offsite radiological emergency response planning and preparedness in those situations in which State and/or local governments decline to participate in emergency planning is provided in Supplement 1 to NUREG-0654 (FEMA-REP-1), Rev. 1 (Reference 10).²⁵
- E. Insofar as emergency planning and preparedness requirements are concerned, a license authorizing fuel loading and/or low power testing and training may be issued after a finding is made by the NRC that the state of onsite emergency preparedness provides reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. The assessment of the onsite emergency plan will be based on pertinent standards as established in 10 CFR 40.47(b) and Appendix E to 10 CFR 50. However, the acceptability of an applicant's onsite emergency plans will be reviewed against standards presented in 10 CFR 50.47(d)(1)-(7).²⁶
- F. NUREG-0654 (FEMA-REP-1) Rev. 1, provides guidance for complying with the Commission's regulations for developing both onsite and offsite emergency response plans. NUREG-0696 (Reference 11) discusses the facilities and systems to be provided by nuclear power plant licensees to aid in their response to emergency situations.²⁷
- G. The ERDS, a direct near real-time electronic data link between a licensee's onsite computer system and the NRC Operations Center, provides for the automated transmission of a limited set of selected parameters at a reactor site. NUREG-1394 (Reference 14), intended for implementing the requirements in Appendix E to Part 50, section VI, provides the minimum standards for the ERDS. In addition, compliance with 10 CFR 50.47(b)(6) and 10 CFR 50, Appendix E, section IV.E.9d requirements relating to general communications may be demonstrated by application of guidelines presented in Reference 15.²⁸
1. ~~The applicant's plans for coping with an emergency meet the requirement standards of 10 CFR Part 50, 50.47(b) as elaborated in 10 CFR Part 50, Appendix E (IV) and the criteria of NUREG-0654 Revision 1, and NUREG-0696. (The criteria of NUREG-0654 have the same status as a regulatory guide.) For the CP review, the requirements of 10 CFR Part 50, 50.34(a)(10) as provided in 10 CFR Part 50, Appendix E, Part II must be met.~~
2. ~~The FEMA findings on the offsite plans have been reviewed and it is determined that these offsite plans are compatible with applicant's plans and meet the applicable criteria~~

~~of NUREG-0654, Revision 1. For the CP review, a specific FEMA finding is not required and the reviewer must evaluate the status of preparedness against the requirements of 10 CFR Part 50, Appendix E, Part H, and NUREG-0718, Appendix B, Sections I.D.2 and III.A.1.2. (Section I.D.2 is reviewed only to assure that a slave of the SPDS is located in the TSC and EOF).~~

- ~~3. A full-scale joint exercise, meeting the requirements of 10 CFR Part 50, Appendix E, Part IV.F, has successfully demonstrated that the applicant and the State and local organizations are capable of taking adequate protective actions should a radiological emergency occur.²⁹~~

Technical Rationale.³⁰

The technical rationale for application of the above acceptance criteria to the review of emergency planning is discussed in the following paragraphs.

1. 10 CFR 50.47 and Appendix E to 10 CFR 50 establish the minimum elements to be addressed in emergency planning at various stages of the licensing process. The issuance of a construction permit, operating license, or combined operating license for a nuclear power plant, is based in part, on findings made by the NRC that adequate protection can and will be taken in the event of a radiological accident. Many of the emergency planning and preparedness requirements are a direct result of lessons learned from the Three Mile Island accident. Proper emergency response actions are critical to mitigating the potential adverse impact that a reactor accident may have on the local population and/or the environment.

An acceptable basis for NRC licensees, State, and local governments to develop radiological emergency plans and methods to improve their overall state of emergency preparedness have been developed and presented in NUREG-0654 (FEMA-REP-1), Rev. 1. NUREG-0696 provides guidance for complying with requirements in Appendix E Section IV relating to the design of emergency response facilities. NUREG-0718 and Supplement Number 1 to NUREG-0737 provide additional guidance for complying with design and implementation requirements associated with emergency response facilities. In addition, NUREG-1394 provides acceptable methods that may be used to implement and comply with the requirements established in Appendix E(VI) relating to the ERDS.

Meeting these requirements provides assurance that necessary emergency response actions can and will be taken in the event of an accident.

III. REVIEW PROCEDURES

Following the acceptance of each SAR, the review is conducted on a schedule which is established by NRR for each SAR. The review consists of an evaluation of the emergency planning information submitted by the applicant using the foregoing Acceptance Criteria. Although the bulk of this information should be found in Section 13.3 of the SAR (or referenced therein) the reviewer should gain familiarity with the site, including the emergency planning zones, demography, land use, plant design and layout, and major accidents postulated

by the applicant. The reviewer should examine relevant sections of the SAR, particularly sections found in Chapters, 1, 2, 6, 7, 9, 11, and 15. The reviewer should also gain familiarity with proposed radiation protection activities and other operational matters that interface with emergency plans, particularly as described in the SAR in sections of Chapters 12 and 13. Draft and final environmental statements for the proposed facility should also be consulted when available during the review process. This information may be supplemented by a personal³¹ visit to the site by the reviewer and meetings with the applicant. ~~In cases where~~³² the applicant is a licensee for a previously licensed plant, then NRC Inspection Reports and the Health Physics Appraisal for the licensed plant³³ should be reviewed. ~~For each case, formal~~³⁴ consultation with ~~the Federal Emergency Management Agency (FEMA)~~³⁵ with respect to the relevant state and local government emergency response capabilities is necessary.

~~For each case assigned, the~~³⁶ The reviewer must determine whether ~~or not~~³⁷ the acceptance criteria identified in subsection³⁸ II above have been satisfactorily met. Any deficiencies should be identified and should form the basis for a request for additional information or transmittal of position statements to the applicant, and should be reviewed with the Section Leader or Branch Chief. Such further review may result in a determination that (a) the applicant has proposed acceptable alternatives, (b) the facts of the case do not warrant the application of the criterion in question, or (c) the facts do warrant the application of the criterion in question and no acceptable alternative has been proposed or identified. If any deficiencies remain in the last category at the conclusion of the review, they must be identified in the safety evaluation report and subsequently resolved with the participation of higher level NRC management.

It should be recognized that the detailed application of the acceptance criteria will in many instances require the exercise of judgment on the part of the reviewer. The reasonableness and adequacy of the factors involved should be viewed in the light of general emergency planning and response experience, bearing in mind that the broad objective of radiological emergency plans is to protect the public by mitigating the potential health and safety consequences of radiation exposure. Ideally, such plans would ~~assure~~³⁹ neither an over reaction nor an under reaction to unexpected events. Reviewers should be particularly alert, however, to provisions which may result in a possible under reaction to a serious event.

~~At~~⁴⁰ For the PSARCP applicant stage, the reviewer should assess the applicant's plans as they relate to Section II of 10 CFR Part 50, Appendix E and, NUREG-0718, Appendix B, Sections I.D.2 and III.A.1.2. (Section I.D.2 is reviewed only to ~~assure~~⁴¹ that a slave of the SPDS is located in the TSC and EOF.) ~~He~~⁴² The reviewer should request a status report from FEMA on the state and local plans and preparedness in support of the licensee, but should emphasize that formal FEMA findings are not required for this review and FEMA participation in CP hearings is not contemplated.

~~At the beginning of the FSAR stage~~⁴³ OL application review, the reviewer should examine the Construction Permit docket record, including PSAR, staff safety evaluation report(s), recommendations of the Advisory Committee on Reactor Safeguards, and the public hearing record, for information that may bear on the FSAR review of plans for coping with emergencies. For multi-unit sites, the reviewer should also carefully distinguish whether the plans are applicable only to the first unit or to subsequent units as well.

In accordance with the general principles established in the Memorandum of Understanding (MOU) between the NRC and FEMA relating to radiological emergency planning and preparedness (Reference 6), FEMA takes the lead for assessing offsite radiological emergency response plans and preparedness and communicates its findings to the NRC. The NRC reviews the FEMA findings in conjunction with the NRC onsite findings in determining the overall state of emergency preparedness.⁴⁴ The reviewer should ~~also~~⁴⁵ formally request FEMA to review offsite supporting plans and provide findings and determinations of this review to the NRC on a schedule agreed upon between the two agencies. The FEMA review may be performed pursuant to the FEMA ~~proposed~~⁴⁶ rule "Review and Approval of State and Local Radiological Emergency Plans and Preparedness," 44 CFR Part 350, (~~Federal Register, Pages 42341-42347, June 24, 1980~~), or the NRC/FEMA Memorandum of Understanding (~~Federal Register, Pages 82713-82717, December 16, 1980~~).⁴⁷ At the conclusion of the review, findings on acceptability of the applicant's proposed plans for coping with emergencies should be prepared for input to the staff's safety evaluation report.

~~Special assistance requests, particularly with regard to the evaluation of meteorological information, emergency action levels, emergency response facilities, and evacuation time estimates should be coordinated through the Emergency Preparedness Development Branch, OIE, which will routinely provide for the technical review of these areas.~~⁴⁸

For standard design certification reviews under 10 CFR Part 52, the procedures above should be followed, as modified by the procedures in SRP Section 14.3 (proposed), to verify that the design set forth in the standard safety analysis report, including inspections, tests, analysis, and acceptance criteria (ITAAC), site interface requirements and combined license action items, meet the acceptance criteria given in subsection II. SRP Section 14.3 (proposed) contains procedures for the review of certified design material (CDM) for the standard design, including the site parameters, interface criteria, and ITAAC.⁴⁹

IV. EVALUATION FINDINGS

The desired evaluation findings at the ~~PSAR~~⁵⁰CP stage should be substantially equivalent to the following statement:

Based on ~~our~~ review of the applicant's preliminary plans for coping with emergencies, and ~~our~~ review of FEMA's status report on offsite plans and capabilities, ~~we find that the~~ review concludes that the⁵¹ preliminary plans are acceptable and either meet or exceed the minimum requirements of 10 CFR Part 50, Appendix E, Part II and the criteria of NUREG-0718, Appendix B, Sections I.D.2 and III.A.1.2 (Section I.D.2 is reviewed only to assure that a slave of the SPDS is located in the TSC and EOF). They provide reasonable assurance that there will be compatibility of the final emergency plans with facility design features, site layout, and site location to such considerations as access routes, surrounding population, land use, and local jurisdictional boundaries for the EPZs as well as the means by which the standards of 10 CFR Part 50, 50.47(b) will be met.

(Subsequent paragraphs should summarize the specific bases for the finding, including how the plans meet each of the elements A through H of 10 CFR Part 50, Appendix E, Part II, and the results of the status report submitted by FEMA.)

The desired safety evaluation report at the FSAROL⁵² stage should summarize specific bases for the conclusions, including how the plans meet each of the standards of 10 CFR Part 50, 50.47(b). The desired evaluation finding at the FSAROL stage should be substantially equivalent to the following:

Based on ~~our~~ review against the criteria in "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," NUREG-0654 (FEMA-REP-1),⁵³ Revision 1, November 1980, and NUREG-0696, "Functional Criteria for Emergency Response Facilities," ~~we conclude that the review concludes that~~⁵⁴, providing the items identified as required conditions of the full-power license are accomplished, the Emergency Plan provides for an acceptable state of emergency preparedness and meets the requirements of 10 CFR Part 50 and Appendix E thereto and the criteria of NUREG-0737, ~~Items I.D.2, III.A.1.2, and III.A.2~~ Supplement Number 1 to NUREG-0737, TMI items I.D.2, III.A.1.2, and III.A.2.2.⁵⁵ ~~(Section I.D.2 is reviewed only to assure that a slave of the SPDS is located in the TSC and EOF).~~⁵⁶

The license has committed to correct the following areas where improvement is needed by the dates indicated.

(List the conditions)

The Federal Emergency Management Agency (FEMA) has provided interim findings on the state and local emergency response plans. FEMA concludes that State and local preparedness is adequate to cope with an accident at. Based upon ~~our~~ review of the licensee's plans and procedures, the NRC and FEMA evaluation of the joint exercise, and ~~our~~ review of the FEMA findings, ~~we find that~~ the state of onsite and offsite emergency preparedness provides reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency.

For design certification reviews, the findings will also summarize, to the extent that the review is not discussed in other safety evaluation report sections, the staff's evaluation of inspections, tests, analyses, and acceptance criteria (ITAAC), including design acceptance criteria (DAC), site interface requirements, and combined license action items that are relevant to this SRP section.⁵⁷

V. IMPLEMENTATION

The following is intended to provide guidance to applicants and licensees regarding the NRC staff's plan for using this SRP section.

This SRP section will be used by the staff when performing safety evaluations of license applications submitted by applicants pursuant to 10 CFR 50 or 10 CFR 52.⁵⁸ Except in those cases in which the applicant proposes an acceptable alternative method for complying with specified portions of the Commission's regulations, the methods described herein will be used by the staff in its evaluation in conformance with Commission regulations.

The provisions of this SRP section apply to reviews of applications docketed six months or more after the date of issuance of this SRP section.⁵⁹

Implementation schedules for conformance to parts of the methods discussed herein are contained in the referenced regulations, regulatory guides, and NUREGs.

VI. REFERENCES

21. 10 CFR Part 50, 50.34(a)(10), "Contents of applications, Preliminary safety analysis report."⁶⁰
32. 10 CFR Part 50, 50.34(b)(6)(v), "Contents of applications, Final safety analysis report."⁶¹
3. 10 CFR Part 50, 50.34(f), "Additional TMI-Related Requirements."⁶²
4. 10 CFR Part 50, 50.47(b), "Emergency Plans."⁶³
5. 10 CFR Part 50, Appendix E, "Emergency Plans for Production and Utilization Facilities."
6. 44 CFR Part 353, Appendix A, "Memorandum of Understanding Between NRC and FEMA Relating to Radiological Emergency Planning and Preparedness," revised June 17, 1993.⁶⁴
67. Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants."
7. ~~Proposed 44 CFR Part 350, "Review and Approval of State and Local Radiological Emergency Plans and Preparedness."⁶⁵~~
8. ~~NRC/FEMA Memorandum of Understanding, December 16, 1980.⁶⁶~~
8. NUREG-0396, EPA 520/1-78-016, "Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants," December 1978.⁶⁷
49. NUREG-0654 (FEMA-REP-1), Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980.⁶⁸
10. Supplement 1 to NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and preparedness in Support of Nuclear Power Plants - Criteria for Utility Offsite Planning and Preparedness," September 1988.⁶⁹
911. NUREG-0696, "Functional Criteria for Emergency Response Facilities," February 1981.⁷⁰

1012. NUREG-0718 Rev. 2, "Licensing Requirements for Pending Applications for Construction Permits and Manufacturing License," January 1982.⁷¹
13. Supplement Number 1 to NUREG-0737, "Clarification of TMI Action Plan Requirements, Supplement Number 1, Requirements for Emergency Response Capability," January 1983.⁷²
14. NUREG-1394 Rev. 1, "Emergency Response Data System (ERDS) Implementation," June 1991.⁷³
15. Generic Letter 91-014, "Emergency Telecommunications," September 23, 1991.⁷⁴

SRP Draft Section 13.3

Attachment A - Proposed Changes in Order of Occurrence

Item numbers in the following table correspond to superscript numbers in the redline/strikeout copy of the draft SRP section.

| Item | Source | Description |
|------|---------------------------------------|---|
| 1. | Current PRB name and abbreviation | Changed to reflect current PRB name and abbreviation, PERB. (Note that this review was also once the responsibility of OIE.) |
| 2. | Editorial revision | Changed "his" to "the" to eliminate gender-specific reference. |
| 3. | Current PRB designation | Changed PRB to PERB. |
| 4. | Integrated Impact Number 1458. | Added a sentence indicating areas of review for a design certification application. |
| 5. | Editorial revision | Reference to NUREG-0654 and 0696 are relocated to the discussion of specific criteria because they by themselves do not define acceptance criteria that is codified in the CFRs. |
| 6. | Editorial revision | Moved the paragraph about the FEMA findings down further in the section. |
| 7. | SRP-UDP format item | Eliminated the description of EPDB responsibilities since EPDB does not exist anymore. Added more specific statement of areas of review and defined EPZ. |
| 8. | Editorial Revision | Text was relocated from second paragraph. |
| 9. | SRP-UDP format item | Added a review interface with the SRP section for the review of meteorological information because an interface is suggested AREAS OF REVIEW in the current SRP section. |
| 10. | SRP-UDP format item | Added a review interface with the SRP section for the review of accident protection because of an understanding of accident protection is basic to emergency planning. |
| 11. | SRP-UDP format item | Added a section on Review Interfaces and inserted the standard paragraph. The interface entries are items which were referred to in the existing SRP section, although no review interface was previously identified. |
| 12. | SRP-UDP format item | Added a review interface with the SRP section for the review of the exclusion area because of the need to address this area in emergency planning. |
| 13. | SRP-UDP format item | Added a review interface with the SRP section for the review of the protection of the control room during emergencies because this must be addressed in the applicant's onsite emergency plans. |

SRP Draft Section 13.3
Attachment A - Proposed Changes in Order of Occurrence

| Item | Source | Description |
|------|---------------------------------------|--|
| 14. | SRP-UDP format item | Added a review interface with the SRP section for the review of the plant information systems because the reviewer must verify that adequate information will be available in emergency response facilities. |
| 15. | SRP-UDP format item | Added a review interface with the SRP section for the review of the post accident sampling systems because of the need for this data in implementing emergency plans. |
| 16. | SRP-UDP format item | Added a review interface with the SRP section for the review of the human factors issues that affect emergency planning and preparedness. |
| 17. | Editorial revision | Deleted the three original paragraphs under ACCEPTANCE CRITERIA and re-organized the material to be consistent with other SRP sections. |
| 18. | Editorial | Re-located 10 CFR 50.47 acceptance criteria to make this section more consistent with the others in terms of acceptance criteria and specific criteria. |
| 19. | Editorial revision | Relocated the citation to Appendix E as providing minimum standards for emergency plans. |
| 20. | Integrated Impact Number 946. | Added a discussion relating to Supplement Number 1 to NUREG-0737 which provides additional guidance regarding the SPDS. |
| 21. | Editorial | Re-located reference to NUREG 0718 from criteria listed in the original version of SRP 13.3. |
| 22. | Integrated Impact Number 946. | Added Supplement 1 to NUREG 0737 as specific criteria. |
| 23. | Editorial | Re-located the specific criteria from the original version of this section to be consistent with the other sections. |
| 24. | Integrated Impact Number 1459. | Added NUREG-0396 (EPA 520/1-78-016) to the list of specific criteria to be used for developing EPZs. |
| 25. | Integrated Impact Number 947. | Added Supplement 1 to NUREG-0654 (FEMA-REP-1), Rev. 1, to provide specific criteria for the development, review, and evaluation of offsite radiological emergency response plans in which State and/or local governments decline to participate in emergency planning. |
| 26. | Integrated Impact Number 1457. | Added a discussion of 10CFR50.47(d) that provides alternate acceptance criteria for issuance of a fuel loading or low power license. |
| 27. | Editorial | Re-located criteria that was originally defined as acceptance criteria in the original version of SRP Section 13.3. |

SRP Draft Section 13.3
Attachment A - Proposed Changes in Order of Occurrence

| Item | Source | Description |
|------|---------------------------------------|--|
| 28. | Integrated Impact Number 1514. | Added a discussion of information presented in NUREG 1394 and Generic Letter 91-014. |
| 29. | Editorial revision | Re-organized this information to be consistent with other SRP sections. |
| 30. | SRP-UDP format item | Added "Technical Rationale" and lead-in paragraph to ACCEPTANCE CRITERIA. |
| 31. | Editorial revision | Deleted personal as superfluous. |
| 32. | Editorial revision | Deleted the phrase "In cases where" for clarification. Replaced it with "if,...then." |
| 33. | Editorial revision | Added "for that licensed plant" for specificity. |
| 34. | Editorial revision | Deleted "for each case" as superfluous and confusing. There is only one case. |
| 35. | Editorial | Removed text since this acronym has previously been called out. |
| 36. | Editorial revision | Deleted "for each case" as superfluous and confusing. There is only one case. |
| 37. | Editorial revision | Deleted "or not" as superfluous. |
| 38. | Editorial addition | Added "subsection" to avoid confusion. |
| 39. | Editorial revision | Changed "assure" to "ensure." |
| 40. | SRP-UDP format item | Added words to identify the type of application for which the review is performed. |
| 41. | Editorial | Changed "assure" to "ensure." |
| 42. | Editorial revision | Replaced "he" with "the reviewer" to eliminate gender-specific reference. |
| 43. | SRP-UDP format item | Added words to identify the type of application for which the review is performed. |
| 44. | Integrated Impact Number 1459. | The memorandum is very specific regarding the review of offsite emergency plans and the reviewer is bound by that memorandum. Therefore additional detail was added. |
| 45. | Editorial revision | Deleted "also" because it is confusing in this context. |
| 46. | Editorial revision | The FEMA rule is now final. The publication details are moved to REFERENCES. |

SRP Draft Section 13.3
Attachment A - Proposed Changes in Order of Occurrence

| Item | Source | Description |
|------|--|---|
| 47. | SRP-UDP format item | The publication details have been moved to REFERENCES. The NRC/FEMA memorandum has been revised several times, most recently on 6-17-93. The memorandum is now included as Appendix A to 44 CFR 354.3. The CFR citation is preferable to the Federal Register since the CFR is updated as changes are made and the CFR includes a publishing history. |
| 48. | SRP-UDP format item | Eliminated this paragraph because of NRC organizational changes. PERB now has responsibility for the reviews. |
| 49. | SRP-UDP Guidance, Implementation of 10 CFR 52 | Added standard paragraph to address application of Review Procedures in design certification reviews. |
| 50. | SRP-UDP format item | Replaced PSAR with CP stage. |
| 51. | Editorial revision | Revised the paragraph by eliminating the words "our" and "we find" from this section to make it less personal. This is an agency review, not a personal review. |
| 52. | SRP-UDP format item | Replaced FSAR stage with OL. |
| 53. | Editorial revision | Completed the document identification to avoid confusion. |
| 54. | Editorial revision | Revised the paragraph by eliminating the words "our" and "we find" from this section to make it less personal. This is an agency review, not a personal review. |
| 55. | Integrated Impact Number 946. | Supplement Number 1 to NUREG-0737 totally replaces the requirements for the designated TMI items in NUREG-0737. TMI Item Instead of identifying TMI Item III.A.2, the revised SRP Section only mentions III.A.2.2. It is thought that TMI Item III.A.2.1 does not pertain. |
| 56. | Editorial revision | This limiting parenthetical thought is not necessary in the Evaluation Findings subsection. The finding should not be made if the SRP Section 7.5 and 18.2 reviewers have not found the SPDS acceptable. |
| 57. | SRP-UDP Format Item, Implement 10 CFR 52 Related Changes | To address design certification reviews a new paragraph was added to the end of the Evaluation Findings. This paragraph addresses design certification specific items including ITAAC, DAC, site interface requirements, and combined license action items relevant to SRP 6.3. |
| 58. | SRP-UDP Guidance, Implementation of 10 CFR 52 | Added standard sentence to address application of the SRP section to reviews of applications filed under 10 CFR Part 52, as well as Part 50. |
| 59. | SRP-UDP Guidance | Added standard paragraph to indicate applicability of this section to reviews of future applications. |

SRP Draft Section 13.3
Attachment A - Proposed Changes in Order of Occurrence

| Item | Source | Description |
|------|--|---|
| 60. | Editorial revision | Gave the title of 10 CFR 50.34(a)(10) as an aid to the reviewer. |
| 61. | Editorial revision | Gave the title of the section of the regulations as an aid to the reviewer. |
| 62. | SRP-UDP format item | Added the TMI item as an acceptance criterion and added the reference. |
| 63. | Editorial revision | Gave the title of the section of the regulations as an aid to the reviewer. |
| 64. | Integrated Impact Number 1459. | Relocated the citation of the NRC/FEMA memorandum of understanding, giving the complete title and the CFR location. This memorandum has been revised three times since the current SRP was issued. The CFR citation will allow subsequent revisions to be identified. |
| 65. | Editorial revision | Moved this reference up in the list to be with the other CFR citations. Note, too, that this is now a final rule. |
| 66. | Editorial revision | Moved this reference up in the list to be with the other CFR citations. |
| 67. | Integrated Impact Numbers 1459. | Added NUREG 0396 to support its reference in subsection II as a document providing specific criteria. |
| 68. | Editorial revision | This reference was moved down in the list of References to be grouped with the other NUREGs. Additional information was added for completeness. |
| 69. | Integrated Impact Number 947. | Added this document as an important reference to listed specific criteria. |
| 70. | Editorial revision | Added the date of publication to complete the citation. |
| 71. | Editorial revision | Updated the citation to Revision 2 and added the date of publication for completeness. |
| 72. | Integrated Impact Number 946. | Added Supplement 1 to NUREG-0737 to list of References. |
| 73. | Integrated Impact Number 1514. | Added reference to NUREG 1394 as guidance for implementing the ERDS system. |
| 74. | Integrated Impact Number 1514. | Added reference to generic letter 91-014 as a document providing guidance relating to the emergency telecommunication system. |

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SRP Draft Section 13.3
Attachment B - Cross Reference of Integrated Impacts

| Integrated Impact No. | Issue | SRP Subsections Affected |
|------------------------------|---|---------------------------------|
| 946 | Add a discussion of NUREG-0737, Supplement 1. | II, IV, and VI |
| 947 | Add a discussion of NUREG-0654/FEMA-REP-1, Revision 1, Supplement Number 1. | II and VI |
| 1457 | Add a discussion of 10 CFR 50.47(d) providing alternate acceptance criteria for issuance of a fuel loading license. | II |
| 1458 | Added a discussion relating to the review of emergency plans for combined license and standard design applicants. | I |
| 1459 | Add a discussion relating to the principles established in the MOU between the NRC and FEMA to the review procedures and add NUREG-0396 to specific criteria. | II, III, and VI |
| 1514 | Added reference to NUREG 1394 and Generic Letter 91-014 to provide guidance on complying with 10 CFR Part 50, Appendix E, IV.E.9d and VI. | II and VI |