# NRP and NIMS Implementation

## Impact on the NRC Incident Response Program, State/Local/Tribal Response, and Licensee Response

Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission

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# Topics

- NRC Incident Response Program
  - Overview
  - NRC Roles
  - Relationships with other Federal Agencies
- Impact of NRP/NIMS Implementation
  - NRC Impact
  - Stakeholder Impact
    - State/Local/Tribal
    - Licensee

# Incident Response Program Overview

- NRC's Role
  - Statutory responsibility
  - To protect public health and safety should an incident occur involving an NRC-regulated site or activity
  - Other Responsibilities
    - Assess plant conditions
    - Evaluate Protective Action Recommendations
    - Support offsite officials
    - Coordinate with other agencies
    - Keep media informed
- Licensee's Role
  - Controlling the regulated materials and facilities it owns/operates
  - Protect public against releases
  - Mitigate consequences of an incident
  - Keep media informed
- State/local/Tribal Role
  - Decide & Implement protective actions
  - Keep media informed
- Federal Role
  - Coordinate protective actions with State/local governments
  - Overall coordination during Incidents of National Significance

# NUREG-0728, "NRC Incident Response Plan"

- Guides NRC Managers in assuring appropriate level of response
- Delineates responsibilities of NRC responders
- Identifies interrelationships between NRC and other organizations
- Guidance for personnel readiness
- "Licensee still has primary responsibility for response effort."

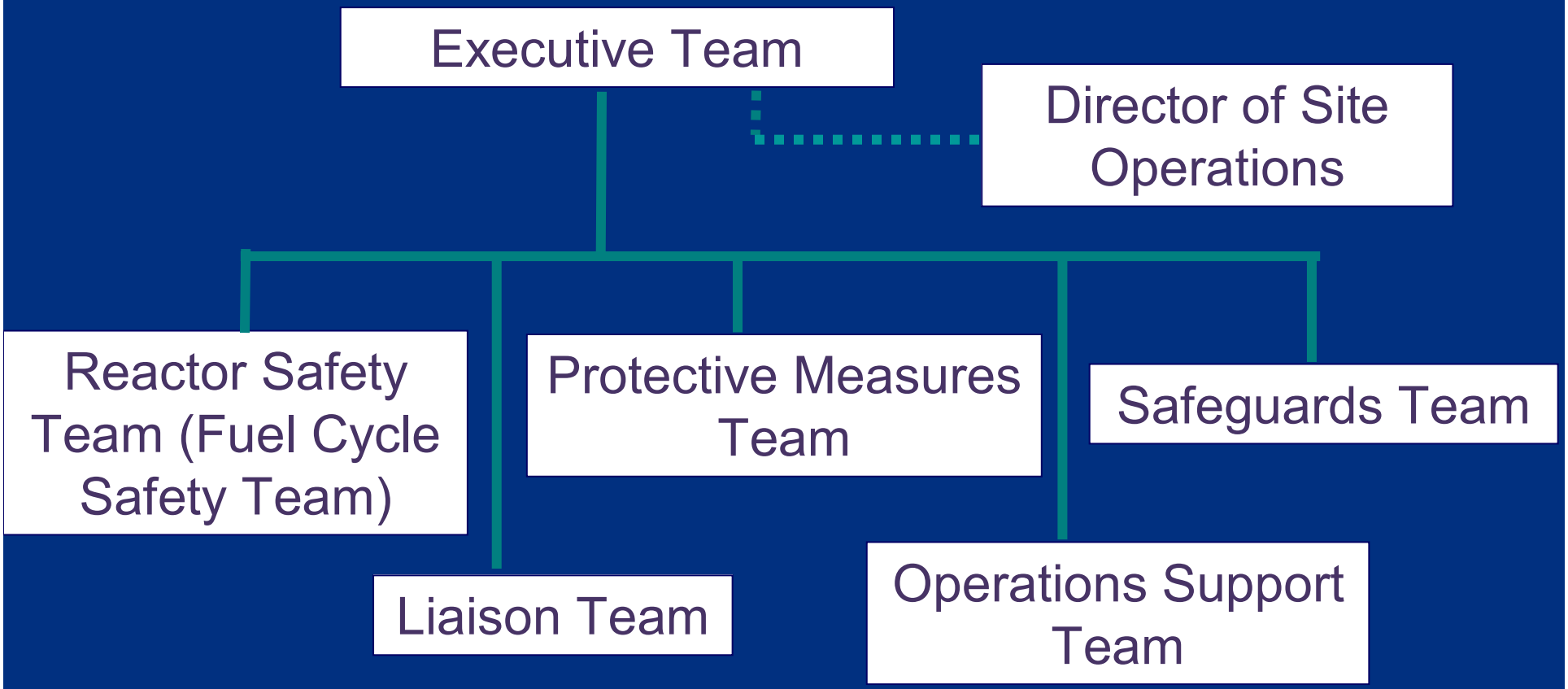
# NRC Response Modes

- **Normal** – Routine state of readiness. 24/7 presence in the NRC Operations Center. Headquarters and Regional NRC managers are "on call" for routine or event notifications.
- **Monitoring** – Heightened state of readiness. NRC Regional Office takes lead in most cases. Regional IRC is staffed. Some extra staffing possible at HQ.
- **Standby** – Event is sufficiently complex or uncertain as to require possible deployment of an NRC Site Team, and staffing of HQ Operations Center.
- **Initial Activation** – Based on conditions at the site, or imminent terrorist activity, onsite NRC presence is needed. Full staffing of HQ Ops Center. NRC Site Team dispatched from affected region.
- **Expanded Activation** – Site Team leads the NRC response. Executive Team Leader delegates authority to Director of Site Operations (DSO).
- **Deactivation** – Situation no longer requires NRC onsite presence. Executive Team decision in consultation with the DSO.

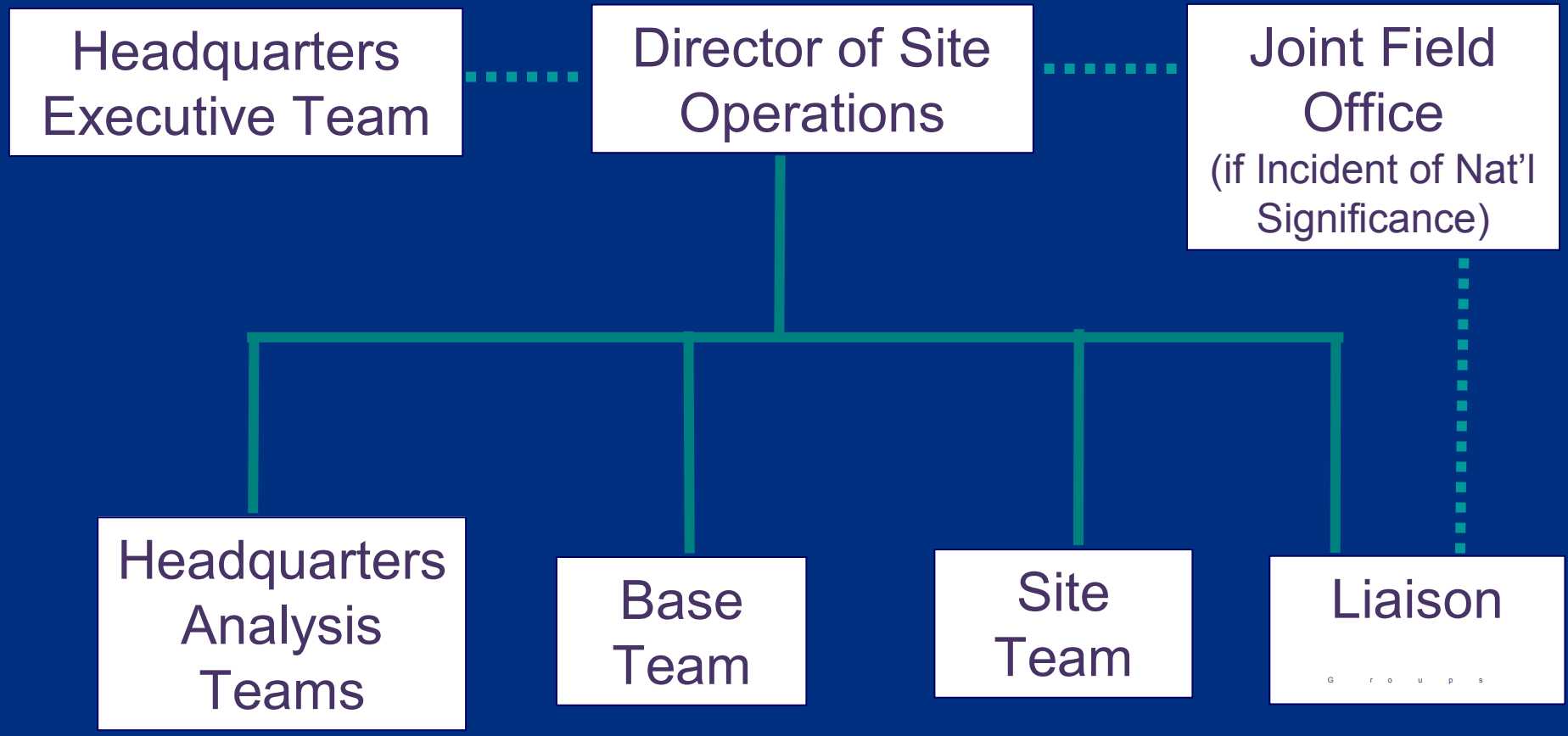
# NRC Response Modes (cont'd)

- Graded approach based upon NRC's assessment of incident severity and uncertainty
- If an event is at a NRC-licensed facility, licensee's event classification considered in response mode decision
- If event is not at a specific NRC-licensed facility, other factors drive NRC's response mode decisions:
  - Transportation incident
  - Electric grid incident
  - Natural disasters
  - Domestic threat (changes in HSAS Level)

# NRC Headquarters Response Organization



# NRC Regional Response Organization (Expanded Activation)



# NRC External Interactions

- Examples of NRC communications with government and private sector organizations during an incident:

  - **White House/Congress** – Overall threat to national security
  - **DHS** – Event declarations, NRC response mode, escalation to Incident of National Significance
  - **NORAD/NORTHCOM** – Terrorist Aircraft Attack
  - **FBI** – Terrorism/law enforcement aspects of an incident
  - **EPA** – Possible Environmental impacts. Status of release.
  - **HHS** – Possible Health impacts due to a release
  - **State Governor's Office** – Protective Action Guideline recommendations
  - **Nuclear Industry Advisory Groups/Vendors** – Technical information regarding affected systems and equipment.
  - **Public/Media** – Information to ensure protection of the public. Press releases on plant/incident status.

# Impact of NRP/NIMS

- Changes will take place over a 4-month implementation period
- Some changes have already been incorporated into NRC procedures
- Some changes to State/local/tribal response
- No significant changes to licensee response/emergency plan
- Areas where changes are anticipated include:
  - Homeland Security Operations Center (HSOC)
  - Interagency Incident Management Group (IIMG)
  - Incident of National Significance (INS)
  - Principal Federal Official/Joint Field Office (PFO/JFO)
  - Interagency Modeling and Atmospheric Assessment Center (IMAAC)

# Homeland Security Operations Center (HSOC)

- NRP Requires 24X7 staffing of the HSOC by DHS and other selected agencies
- NRC Approach:
  - 24X7 staffing not required due to existence of HOO-HERO staffing at NRC Headquarters
  - NRC Desk Officer would be sent to HSOC when requested by DHS to provide “reach-back” capability
  - NRC has sent desk officers on as-needed basis for significant events/exercises since issuance of INRP
  - More formalized procedure for HSOC staffing will be developed to meet NRP requirements
- Impact to State/local/tribal: HSOC will be notified for certain types of events (NRC needs timely notification as well)
- No changes to licensee’s emergency plan

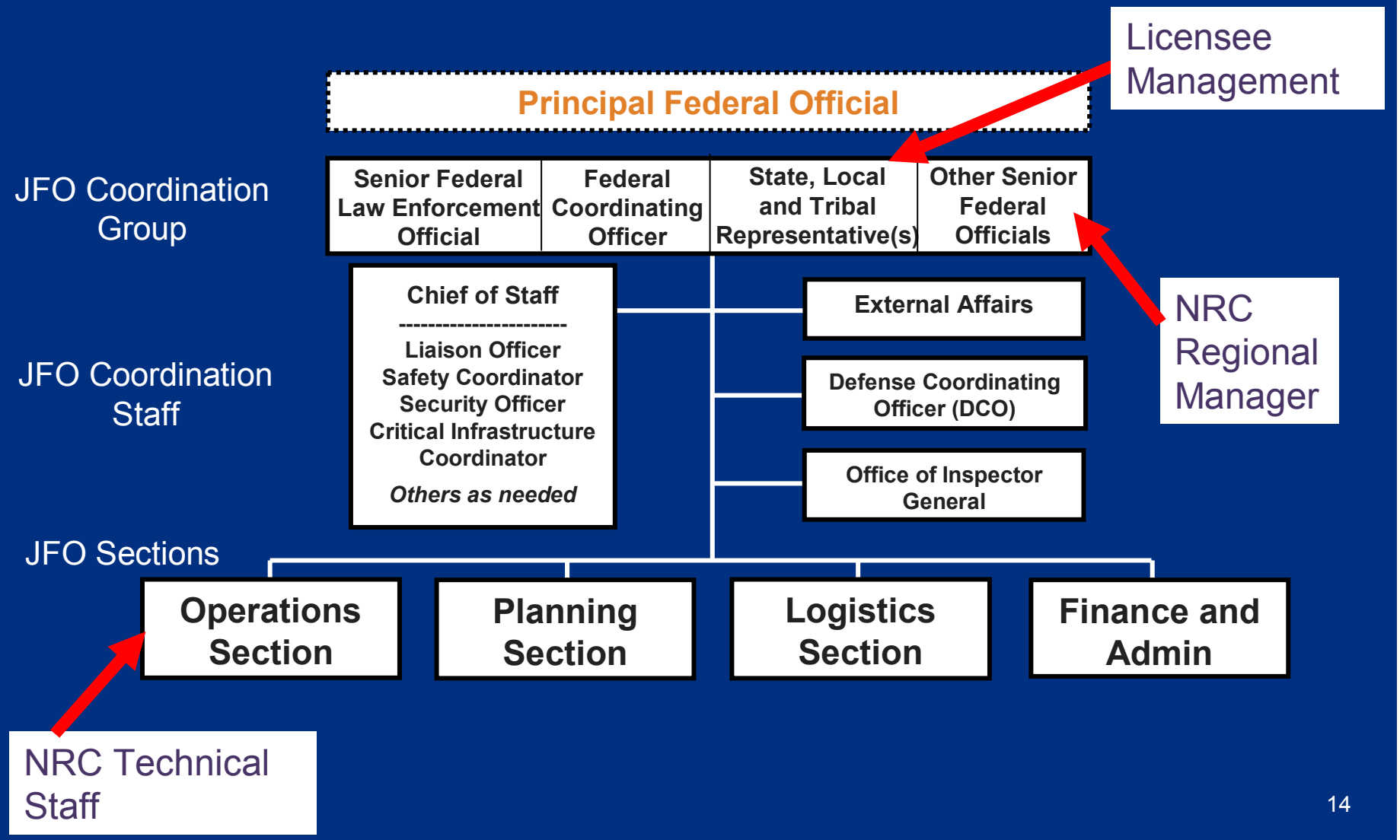
# Interagency Incident Management Group (IIMG)

- Convened by DHS during an Incident of National Significance in order to have senior personnel on hand who can represent their respective agencies
- NRC has staffed IIMG for exercises/events since INRP issuance
- NRC will establish more formal internal procedures for IIMG staffing to meet NRP requirements
- Affected States may be represented on the IIMG
  - Via DHS Office of State and Local Gov't Coordination and Preparedness, or
  - Via a State Liaison to the IIMG
- No changes to licensee's emergency plan

# Incident of National Significance (INS)

- An incident of size, scope, and threat that requires a coordinated Federal, State, local, and private entity response coordinated by DHS. For NRC Licensees, following thresholds apply:
  - Reactor Event that escalates to the level of General Emergency
  - Any Terrorist-related Event
- Secretary of Homeland Security declares an INS
- PFO assigned to locally represent the Secretary
- For a nuclear/radiological INS, the NRP's Nuclear/Radiological Annex defines which Federal organizations will be involved
- Structure of NIMS/JFO provides framework for communications once an INS has been declared and all Federal/State/local responders identified
- State/local/tribal and Licensee responsibilities:
  - Recognize situations involving NRC licensees that could escalate to INS level
  - Recognize DHS as coordinator of Federal response effort during an INS

# Principal Federal Official/Joint Field Office (PFO/JFO) Concept



# PFO/JFO Impact on NRC

- An INS involving an NRC-regulated activity will most likely result in dispatch of an NRC Site Team, led by a Director of Site Operations (DSO)
- In addition, as a Coordinating Agency, NRC will provide a Senior Federal Official (SFO) as a representative to the JFO Coordinating Group.
  - SFO is a senior NRC manager (SES), initially from the affected Region
  - SFO would be accompanied by appropriate NRC Technical Staff
- Public affairs tasking (press releases, briefs, etc) will be coordinated with the Joint Information Center (JIC).

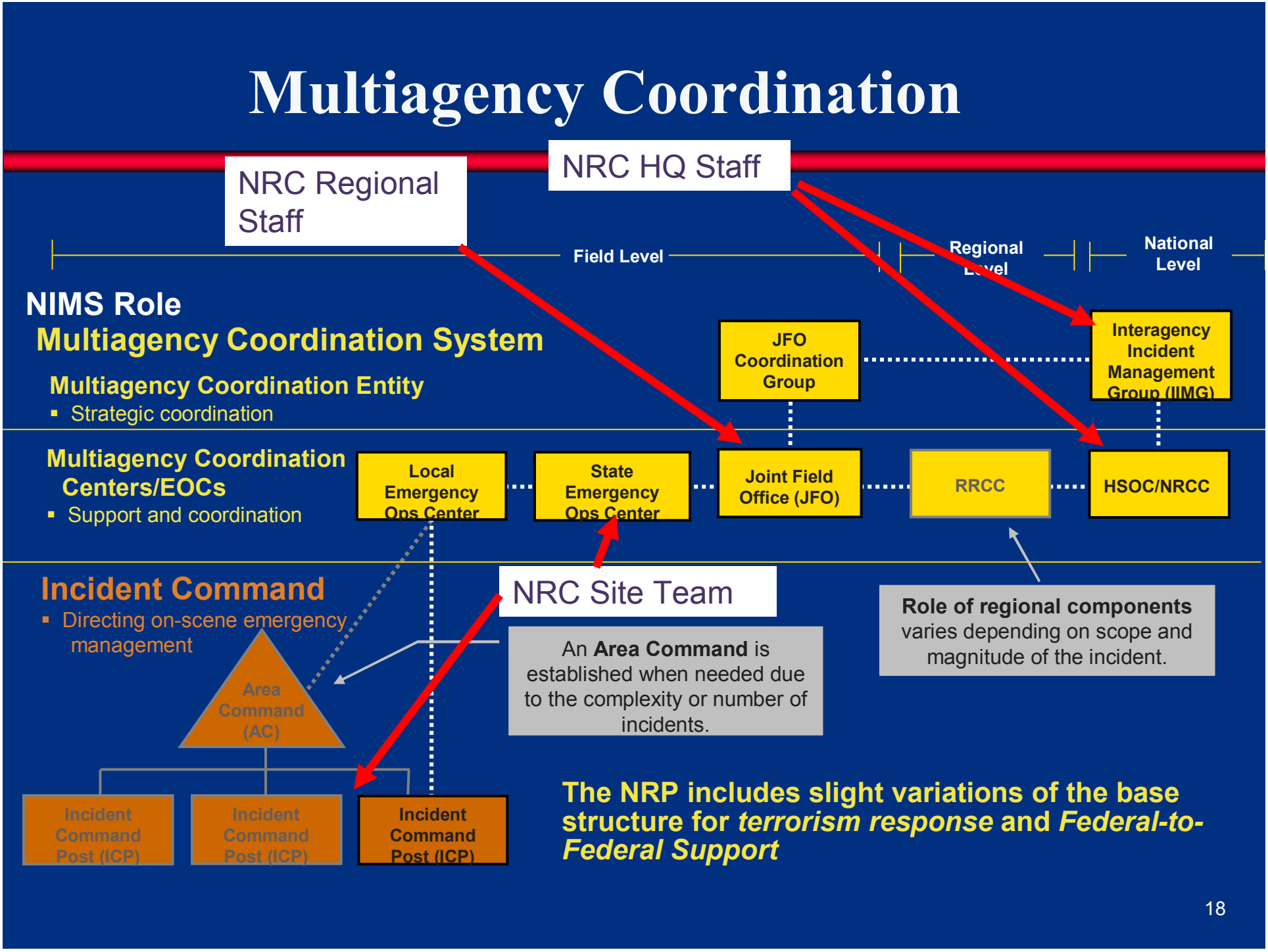
# PFO/JFO Impact on State/Local/Tribal Response

- Affected jurisdictions should also be prepared to provide representatives to the JFO Coordinating Group.
- State and local EOCs will be tied into the JFO coordination and communications structure
- State and local jurisdictions may send public affairs personnel to the JIC to aid with media communications

# PFO/JFO Impact on Licensees

- Designation of an Incident Command Post (ICP):
  - The ICP is the field location where primary tactical-level, on-scene incident command functions are performed. May be co-located with incident base or other incident facilities. For a nuclear reactor plant incident, the licensee's EOF may serve as the Incident Command Post.
  - The ICP passes information to the JFO directly, or via State/local EOCs
- May be asked to dispatch representatives to the JFO.
  - Coordination Staff to provide additional intelligence information (most likely for a terrorist-related event)
- Licensee may send public affairs representatives to the JIC to aid with media communications.

# Multiagency Coordination



# Interagency Modeling and Atmospheric Assessment Center (IMAAC)

- **Impact on NRC**
  - Close coordination with NRC's Protective Measures Team to determine effects of any release
  - Uses source term supplied by NRC
  - Coordinated Federal prediction of atmospheric dispersion and predictions
- **Impact on States**
  - Interface with IMAAC via NRC/Licensee to corroborate protective action recommendations
- **Impact on Licensees**
  - Reiterates the importance of licensee communicating pertinent plant data to the NRC and the States
    - Plant data is used to predict source term before an actual release takes place, allowing for maximum time to inform the public of recommended protective actions

# Summary/Conclusions

- NRC roles remain the same
- Licensee responsibilities unaffected
- Additional organizational interfaces (e.g. DHS, JFO, HSOC)
  - May require notification and staffing by NRC/State depending on severity of an incident.
- New terminology (PFO, HSOC, Coordinating Agency, IIMG)