



Via Electronic Mail

July 27, 2011

Annette L. Vietti-Cook, Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications Staff

Subject: NRDC's Petition to modify the emergency operating procedures technical guidelines for strengthening and integrating onsite emergency response.

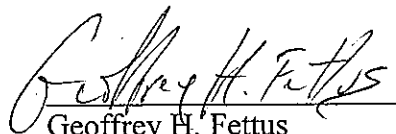
Dear Madam Secretary:

Pursuant to 10 C.F.R. § 2.206, the Natural Resources Defense Council, Inc. ("NRDC") hereby petitions the U.S. Nuclear Regulatory Commission ("NRC") to order licensees to modify the emergency operating procedures (EOP) technical guidelines (required by Supplement 1, "Requirements for Emergency Response Capability," to NUREG-0737, issued January 1983 (GL 82-33)) to (1) include EOPs, Severe Accident Mitigation Guidelines (SAMGs), and Extensive-Damage Mitigation Guidelines (EDMGs) in an integrated manner, (2) specify clear command and control strategies for their implementation, and (3) stipulate appropriate qualification and training for those who make decisions during emergencies.

The rationale and the bases for this petition can be found in the NRC Staff report, Charles Miller, et al, "Recommendations for Enhancing Reactor Safety in the 21st Century: The Near Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," SECY-11-0093, July 12, 2011. We look forward to providing NRC with additional technical support for this petition after it has been accepted and docketed.

Please do not hesitate to contact us at (202) 289-6868 if you have any questions. NRDC appreciates your prompt consideration of this matter.

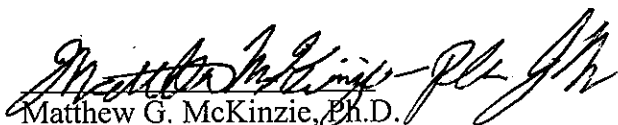
Sincerely,



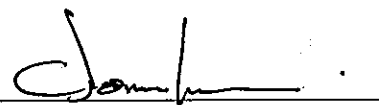
Geoffrey H. Fettus
Senior Project Attorney



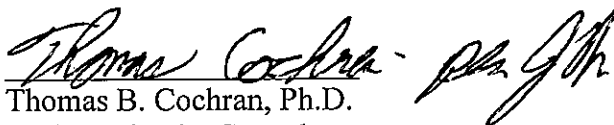
Christopher E. Paine
Director, Nuclear Program



Matthew G. McKinzie, Ph.D.
Senior Scientist



C. Jordan Weaver, Ph.D.
Science Fellow



Thomas B. Cochran, Ph.D.
Senior Scientist Consultant
Wade Greene Chair for Nuclear Policy

CC:

The Honorable Gregory B. Jaczko, Chairman
The Honorable George Apostolakis
The Honorable William D. Magwood, IV
The Honorable William C. Ostendorff
The Honorable Kristine L. Svinicki

Proposed Actions

Pursuant to 10 C.F.R. § 2.206, NRDC petitions the Nuclear Regulatory Commission (“NRC”) to order licensees to modify the emergency operating procedures (EOP) technical guidelines (required by Supplement 1, “Requirements for Emergency Response Capability,” to NUREG-0737, issued January 1983 (GL 82-33)) to (1) include EOPs, Severe Accident Mitigation Guidelines (SAMGs), and Extensive Damage Mitigation Guidelines (EDMGs) in an integrated manner, (2) specify clear command and control strategies for their implementation, and (3) stipulate appropriate qualification and training for those who make decisions during emergencies. NRDC requests that the Commission issue its order within ninety days.

Rationale for the Petition for Orders

The rationale for this petition is found in the NRC Staff report, Charles Miller, et al, “Recommendations for Enhancing Reactor Safety in the 21st Century: The Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident,” SECY-11-0093, July 12, 2011. See particularly, Section 4.2.5, pp. 46-49 regarding Recommendation 8.1, p. 49. NRDC believes such an order and the Near-Term Task Force Review of this issue is consistent with 10 C.F.R. § 2.202 (a), which states in pertinent part: “[t]he Commission may ...take such other action as may be proper by serving on the licensee ...an order that will: (1) Allege ... the potentially hazardous conditions or other facts deemed to be sufficient ground for the proposed action, and specify the action proposed.”

Statement of Interest

NRDC is a national non-profit membership environmental organization with offices in Washington, D.C., New York City, San Francisco, Chicago, Los Angeles and Beijing. NRDC has a nationwide membership of over one million combined members and activists. NRDC’s activities include maintaining and enhancing environmental quality and monitoring federal agency actions to ensure that federal statutes enacted to protect human health and the environment are fully and properly implemented. Since its inception in 1970, NRDC has sought to improve the environmental, health, and safety conditions at the nuclear facilities licensed by NRC and its predecessor agency.