
INSPECTION PROCEDURE 71114.01

EXERCISE EVALUATION

Program Applicability: 2515

71114.01-01 INSPECTION OBJECTIVE

To evaluate the adequacy of the licensee's conduct of the biennial exercise and its capability to assess performance via a formal critique process in order to identify and correct weaknesses associated with planning standard 10 CFR 50.47(b)(14).

Note Exercise evaluations for hostile action based events are performed using the "Exercise Evaluation - Hostile Action (HA) Event" attachment rather than this attachment.

71114.01-02 INSPECTION REQUIREMENTS

02.01 Confirm, that the licensee has submitted its biennial exercise scenario, that Attachment 71114.08, "Scenario Evaluation" review has been completed, and any concerns have been provided to the licensee.

02.02 Prepare for the biennial exercise inspection. A biennial exercise is required for each licensee site, including each licensee at a co-located site.

02.03 Review weaknesses and corrective actions identified as a result of previous drill and exercise reports, beginning with the previous biennial exercise, and develop a list of performance areas to be observed during the exercise. Review, at a minimum, all previously identified risk-significant planning standard (RSPS) corrective actions and observe during the exercise.

02.04 If the exercise scenario contains demonstration of strategies, procedures, and / or guidance developed under § 50.54(hh)(2) observe and evaluate the implementation of these activities.

02.05 Perform independent observations of licensee performance in classification, notification, PAR development, dose assessment activities and as many other aspects of performance as resources allow. In the case of co-located licensees, verify licensee compliance with the requirements of 10 CFR 50, Appendix E, paragraph IV.F.2.c concerning the continuance of certain activities in the period between biennial exercises.

- | 02.06 Evaluate the licensee's identification of weaknesses and identify any weaknesses observed by the inspection team not appropriately identified by the licensee's formal critique and entered into the corrective action program.
- | 02.07 Identify recurring weaknesses in similar activities since the previous biennial exercise in order to evaluate the effectiveness of corrective actions.
- | 02.08 Identify weaknesses that may reveal a failure to comply with a regulatory requirement.
- | 02.09 Evaluate the exercise against EP cornerstone performance expectation.
- | 02.10 Represent the NRC at the Federal Emergency Management Agency (FEMA) public meeting, as negotiated.
- | 02.11 Review the proposed offsite exercise deficiencies provided by FEMA and inform the licensee of those deficiencies. [C1]

71114.01-03 INSPECTION GUIDANCE

The focus of this inspection is to evaluate the adequacy of the licensee's conduct of the biennial exercise and its ability to assess performance via a formal critique process in order to identify and correct weaknesses. Emphasis should be placed on licensee assessment of classification, notification, PAR development and dose assessment activities, but inspectors should evaluate as many other aspects of performance and the associated critique as resources allow. Inspection approaches different from those below are acceptable if they meet the inspection requirements and provide the basis for the inspector to make the determinations required in 03.09.

03.01 Confirm, that the licensee has submitted its biennial exercise scenario, that Attachment 71114.08, "Scenario Evaluation" review has been completed, and any concerns have been provided to the licensee for resolution.

- a. Failure to submit the scenario 60 days prior to the exercise should be evaluated as an apparent violation of Appendix E to Part 50, §IV.f.(2)(b). Failure of the licensee to address the concerns prior to the exercise may be a factor in determining whether a remedial exercise is warranted. (See 03.09 below.)

03.02 Prepare for the Biennial Exercise Inspection.

- a. Review the scenario for a summary understanding, if not already done, as inspection preparation. Ensure that there is a consistent pre-exercise understanding of the expected decisions for DEP PI opportunities and extent of exercise demonstration/simulation between the inspection team and the licensee.
- b. Develop a plan to deploy inspection resources in a manner to observe classification, notification, PAR development and dose assessment activities. A review of DEP PI data for failures and/or adverse trends will help inform what specific areas should be observed. If the DEP data review does not indicate any significant failures or trends, a

sampling of RSPS activities should be sufficient and inspection resources may then be allocated to observe other supporting program functions

- c. Consider the prioritization guidance in Attachment 1, "Prioritization of Additional Areas for Inspection" to develop a plan to deploy inspection resources to observe other activities as practical. Select other areas for inspection based on resource availability, past history, efforts to correct weaknesses and/or logistical limitations
- d. Include in the inspection plan for sites with co-located licensees, verification of the conduct, observation and, as appropriate, licensee critique of activities required by 10 CFR 50 Appendix E §IV.F.2.c to maintain interface with the affected State and local authorities and licensee. See RG 1.101, "Emergency Response."
- e. NRC inspectors do not evaluate offsite agency performance, but will rather focus on the interface of licensee personnel with offsite agencies. However, any observed offsite performance weaknesses that impact the licensee's ability to implement the onsite E-Plan should be shared with the FEMA evaluation team for further assessment.
- f. Review the E-Plan and Emergency Plan Implementing Procedures (EPIPs) that provide instructions for classification, notification, PAR development and dose assessment activities, and other functional areas relevant to the exercise. Develop an understanding of the criteria for timely and accurate completion of these activities based on EPIPs, the scenario, and NEI 99-02, "Regulatory Assessment Performance Indicator Guideline." *Ensure that the E-Plan and EPIPs contain criteria concerning protective actions for non-essential onsite personnel, including evacuation for Site Area Emergencies and General Emergencies.* [C2]
- g. Familiarize yourself with the licensee's critique process and discuss expectations with the licensee. This familiarization should include the critique scheduling, content, and participation, as well as the inspector's need to know when the critique process is complete. The NRC considers the critique process complete when all draft conclusions related to the identified weaknesses have been presented to licensee senior management, and any management questions or comments have been documented. The licensee should understand that the critique should not be delayed in order to address every minor problem identified.
- h. Review the licensee's implementation of the new or amended regulatory requirements in 10 CFR Part 50 Appendix E §IV.C.2 and § IV.I during the first performance of this attachment subsequent to **June 20, 2012**. Specifically:
 - 1. Review the program documentation for emergency classification against 10 CFR Part 50 Appendix E §IV.C.2 and the guidance in NSIR/DPR-ISG-01 §IV.H, "Emergency Declaration Timeliness."
 - 2. Review program documentation for onsite protective actions against the guidance of NSIR/DPR-ISG-01 §IV.F, "Protective Actions for Onsite Personnel."
- i. Schedule a briefing of the inspection team by licensee personnel before the exercise to discuss exercise content/conduct and any late scenario revisions. This is an opportunity to ask questions regarding the scenario, licensee expectations for judging

timely and accurate DEP PI opportunities, logistics, mentor arrangements, shift changes, etc.

03.03 Review Past Weaknesses and Corrective Actions.

- a. Review previously identified weaknesses and corrective actions from licensee drill/exercise reports, QA audits, and NRC exercise inspection reports since the last biennial exercise and individual DEP PI inputs below the quarterly reported value. This action does not replace the review of corrective actions performed under IP 71114.05, but rather, is to identify those weaknesses and corrective actions that can best be evaluated in the context of an emergency exercise as opposed to a program inspection, such as ERO performance weaknesses.
- b. Include equipment and facility items or other areas thought to be appropriate in the sample of corrective actions identified for observation during the exercise.

03.04 If the exercise contains the demonstration of strategies, procedures, and / or guidance developed under § 50.54(hh)(2) observe and evaluate the licensee's implementation of their E-plan commitments.

Note The inspector is not expected to evaluate of the adequacy or regulatory compliance of the licensee's actions and / or procedures, only the licensee's implementation of their E-plan commitment(s) for the 50.54(hh)(2) strategy requirement.

03.05 Perform Independent Observation of Licensee Performance.

- a. Observe licensee performance in classification, notification, PAR development, dose assessment activities and the other areas selected.

Note: The licensee has demonstrated the capability to make a notification in 15 minutes if offsite response organizations identified in the E-plan receive notification of, at a minimum, the declared emergency classification level within 15 minutes of declaration. The licensee's critique should identify any delay occurred in making a notification to one or more OROs (e.g., an ORO cannot be reached). Any notification delay that was under the control of the licensee to foresee and prevent (e.g., telephone call lists not kept up-to-date) should be evaluated as a failure to comply and assessed for significance.

1. Identify any apparent performance weakness(es). 10CFR50 Appendix E §IV.C.2
2. Gather copies of completed forms and checklists that support or document classification, notification and PAR development activities and the other areas selected for inspection.
3. Maintain inspector-identified weaknesses confidential until after the formal licensee critique. Ensure that the licensee critique conclusions are complete, including management review, before discussing inspector observations and conclusions.

- b. Identify occurrences of the prompting of exercise players that prevented the identification and correction of ERO performance weaknesses. Accordingly, the failure of the licensee to identify the weaknesses, which would have been identified if not for the prompting, may be a performance deficiency that should be evaluated as a failure to comply and assessed for significance. Prompting may also be a basis for failing a DEP PI opportunity. See Appendix 2 to IP 71114 for further guidance.
- c. Evaluate the readiness of the emergency response facilities and equipment, including alternate and backup facilities to the extent feasible during the exercise.
- d. Evaluate the OSC, TSC and EOF capability to staff, activate and perform assigned tasks during the exercise. The activation times for these facilities should be noted and evaluated against E-Plan commitments.

Determine the licensee's commitments with regard to how the emergency response activation timeliness is assessed (e.g., when the "clock starts" and the "clock stops"). In the absence of an approved alternative, the NRC expects that the clock starts with the declaration of an Alert or higher emergency classification level and ends when the facility is ready to assume its assigned functions under the E-Plan and relieve the on-shift staff of those functions. (Although the facility may be ready, the on-shift staff relief may be postponed in the interest of completing critical tasks prior to turnover.)

- e. Evaluate the capabilities of the primary (alternate and backup, as applicable) EOF against the requirements of 10 CFR Part 50 Appendix E §IV.E.8.c and the guidance in NSIR-DPR-ISG-01 §IV.I, "EOF—Performance-Based Approach" during performances of this attachment subsequent to June 20, 2012. Specifically the capability to:
 - 1. Analyze plant technical information.
 - 2. Provide technical briefings on event conditions.
 - 3. Provide technical briefings on event conditions and prognosis to other licensee ERO locations and offsite response organizations for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves.
 - 4. Obtain and display plant data and radiological information for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves.
 - 5. Analyze plant technical information.
 - 6. Support response to events occurring simultaneously at more than one nuclear power reactor site if the emergency operations facility serves more than one site.

03.06 Evaluate Licensee's Identification of Weaknesses.

- a. Evaluate the licensee's conduct of the critique process. Licensees perform critiques in many different ways and inspectors should be flexible in accepting mechanisms for weakness identification. In particular verify:

1. That all weaknesses are captured and entered into a corrective action system with appropriate priority, regardless of whether the weakness was verbalized at a critique meeting, and in a manner that will allow NRC review of the resolution in the future (i.e., during subsequent biennial exercises). This is the critical feature of any critique.
 2. Insure that there is adequate evidence that all weaknesses will be entered into a corrective action system. If the inspector does not have adequate evidence that a weakness has or will be captured and entered into the corrective action system, the critique is not acceptable and a critique problem exists.
 3. Verify that weaknesses associated with RSPS are given the highest priority in the critique processes, however, all weaknesses that could preclude effective implementation of the E-Plan in an actual emergency (e.g., a failure to implement), are to be identified and corrected.
- b. Determine whether the licensee has properly dispositioned the classification, notification, and PAR development activities with regard to PI statistics. The licensee's assessment of performance **should** be in accordance with the criteria of NEI 99-02, Section 2.4, "Emergency Preparedness Cornerstone, **Drill and Exercise Performance.**" Any discrepancies should be discussed with licensee management and documented.
 - c. Observe, if feasible, the player self-assessments (e.g. "hot washes") in each of the emergency response facilities.
 - d. Conduct a pre-critique briefing with the EP staff/management prior to the formal critique to discuss any non-exercise-related inspection observations/findings, and to obtain the licensee's preliminary critique of the exercise results. This meeting will aid the inspector in preparation for the formal exit meeting with licensee senior management (typically conducted following the formal critique).
 1. Do not share the NRC exercise observations at this meeting, even if they are consistent with the licensee's preliminary critique.
 2. Stress at this meeting that for inspection purposes, the formal critique should focus on weaknesses associated with a **RSPS**; all observed weaknesses are required to be entered into the corrective action system. The inspector should discuss any change in evaluation since the pre-critique discussion. The balance of the critique presentation is determined by the licensee's process.
 - e. Observe the licensee's critique and determine if the weaknesses observed by the inspection team were identified.
 1. Evaluate all inspector-identified weaknesses not captured by the licensee. Ensure each issue actually represents a potential critique problem and not an inspector's misinterpretation of an exercise participants' performance, or a participants' performance of an activity not observed. Ensure a complete understanding of the logic underlying the licensee's disposition before identifying any issue as a critique problem. If the inspector identifies that a well-founded

evaluator-identified weakness is improperly dispositioned and not **adequately** entered into the corrective action system, a critique problem exists, since the licensee is required to enter identified weakness into a corrective action system. Discuss such problems with cognizant licensee staff and management once the formal critique has been completed.

2. Document and assess licensee critique problems for significance. Failures of the licensee evaluation should be addressed during the NRC exit meeting.
3. Verify that licensee-identified exercise weaknesses are entered into the licensee corrective action system

03.07 Identify Recurring Weaknesses.

a. Identify **if any of the weaknesses selected in Step 03.03 for evaluation had occurred in this exercise** and determine **if this recurrence is the result of ineffective corrective actions.**

1. Determine if the licensee identified the trend or repeat weakness and entered it into the corrective action system.
2. Perform a detailed review of any failure to correct a drill or exercise weakness, including a detailed review of the weakness and the effectiveness of associated corrective actions, based on the complete history of the issue. The intent of this assessment is to see if there is a pattern of recurring performance problems in similar activities in order to identify ineffective corrective actions. A single repeat of a weakness should not automatically be deemed a failure of the corrective action system. Conversely, a single success in a drill or exercise (e.g., by one well-drilled team) should not necessarily be considered a demonstration of problem resolution. **When a previously identified weakness recurs in a subsequent drill or exercise, the inspector should perform an assessment of the effectiveness of the prior corrective actions based on a complete history of the issue,** the inspector should:
 - (a) Review specific corrective actions identified for the previous weaknesses, as well as similar occurrences in response to actual events, drills, exercises and training evolutions.
 - (b) Consider the status of the DEP PI as well as the status of the relevant RSPS components of the DEP PI.
 - (c) Review corrective action, self-assessment, and inspection records for an entire inspection cycle with emphasis on similar performance deficiencies.
 - (d) Verify completion of associated corrective actions.

03.08 Identify Failures to Comply with Regulatory Requirements.

- a. Evaluate program element issues of concern related to the effectiveness and adequacy of the E-Plan, or its implementing procedures¹, observed during an exercise as an apparent failure to comply with the associated 10 CFR 50.47(b) planning standards and Appendix E requirements and assess significance in accordance with the EP SDP. For example, the ERO field monitoring team was unable to perform the survey because of ineffective or inadequate survey procedures or equipment. Such issues, whether identified by the licensee or inspection team, are not treated as weaknesses, which are defined as deficiencies in ERO performance. The inspector should:
 1. Review the history of identified issues to obtain relevant information.
 2. Determine, immediately if possible, if the program no longer meets the applicable planning standard. If this cannot be accomplished immediately, confer with regional management for direction.
 3. Evaluate the concern and the results of the additional review, assess the significance through the EP SDP, and document the findings.

03.09 Evaluate Exercise Against EP Cornerstone Performance Expectation.

- a. Determine whether the exercise performance demonstrated that reasonable assurance exists that the licensee can effectively implement its Emergency Plan to adequately protect the public health and safety in the event of a radiological emergency.”
- b. Evaluate, as necessary, whether a remedial exercise is required by Section IV.F.2.f of Appendix E to 10 CFR 50. That section provides the requirements for a remedial exercise, if the E-Plan is not satisfactorily tested during the biennial exercise such that the NRC cannot find reasonable assurance that adequate protective measures can be taken in the event of a radiological emergency. Not invoking this regulation implies that the inspection team came to the conclusion that the E-Plan was satisfactorily tested. If the exercise was not a satisfactory test of the E-Plan or problems have been identified which potentially could result in a remedial exercise, the inspectors will obtain management review, and any subsequent action would not be decided by the inspection team alone. A remedial exercise may be **requested** where:
 1. Confidentiality is compromised to an extent that **the exercise no longer affords the opportunity for the licensee to assess ERO performance of key skills and to identify necessary corrective actions. For example, the re-use of a scenario, a large portion of which was recently used (e.g., in a practice exercise for the graded exercise) the same scenario for the same ERO members. Since each situation needs to be considered on a case-by-case basis, the inspector should gather information that describes the scope of the breach and the number ERO members and their positions.**
 2. The scenario does not provide the opportunity for demonstration of key skills.

¹ The E-plan contains the licensee’s commitments to NRC regulations. The implementing procedures are the licensee’s methods of implementing those commitments and may be used to judge effective, timely, and accurate implementation.

3. The scenario is not implemented in such a way that provides the opportunity for demonstration of key skills, or
4. ERO performance does not provide the NRC with a basis to determine that key skills have been maintained.

03.10 Represent the NRC at the FEMA Public Meeting.

Note For licensee locations that have multiple FEMA regions involved in the exercise evaluation, the inspector will need to determine which FEMA Public Meeting(s) can be attended based on inspection resources, schedules, etc.

- a. Represent the NRC at the FEMA public meeting. Make the appropriate statement as to the adequacy of exercise conduct from the NRC perspective.
 1. "The preliminary observation of the inspection team is that conduct of the exercise was adequate to demonstrate the licensee's compliance with the EP Cornerstone Performance Expectation as well as reasonable assurance of the licensee's ability to effectively implement its emergency plan to adequately protect the public health and safety in the event of a radiological emergency." This is the preferred statement to be used at the FEMA public meeting.
 2. "The NRC inspection team was not able to conclude its review of the exercise at this time. NRC will continue to review the available information before issuing an official inspection report." This statement should be used when the exercise conduct did not demonstrate support of the performance expectation.

Note: Potential findings against the licensee's program (i.e., against the exercise critique) as a result of the inspection should not be announced at the public meeting. NRC inspection reports are public information and will be released as soon as they are approved by management.

03.11 Review FEMA-Identified Exercise Deficiencies and Remedial Actions.

- a. *Request NRC Headquarters to promptly inform the regional office of any potential deficiencies and remedial actions when notified by FEMA Head-quarters per the "NRC/FEMA Memorandum of Understanding."*
- b. *Upon receipt of the letter providing official notification of offsite exercise deficiencies, review the proposed deficiencies and their bases for understanding. FEMA review and findings are entitled to a presumption of adequacy and are to be taken at face value. If the basis for any deficiency is not clear or if the reviewer is aware of information to the contrary, obtain clarification from NRC Headquarters staff, Regional State Liaison Officers (RSLOs), or regional FEMA staff.*
- c. *Inform the licensee of offsite deficiencies via formal letter. [C1]*

Direct inspection effort for this attachment is estimated to be, on average, between 54 hours and 74 hours, regardless of the number of reactor units at a site. Approximately 20 percent of the hours represent residents' effort and 80 percent of the hours represent EP specialists' effort.

When the inspection involves a co-located licensee biennial exercise, an additional 16 hours for an EP Specialist is estimated to be necessary, regardless of the number of reactor units at a site.

71114.01-05 REFERENCES

Inspection Procedure 71152, "Identification and Resolution of Problems."

Inspection Procedure 71151, "Performance Indicator Verification."

Information Notice 85–80, "Timely Declaration of an Emergency Class, Implementation of an Emergency Plan, and Emergency Notifications,"

EPPOS-2, "Emergency Preparedness Position (EPPOS) on Timeliness of Classification of Emergency Conditions"

NEI-99-02, "Regulatory Assessment Performance Indicator Guideline"

71114.01-06 PROCEDURE COMPLETION

This procedure is considered complete when all the inspection requirements listed in the procedure have been satisfied. For the purpose of reporting completion in the Reactor Program System (RPS), the sample size is defined as **one**. A sample size of **one** will be reported in RPS when the procedure is completed in its entirety. **Regions should use note 5 in RPS, "not applicable – completion not required during this inspection cycle" when Hostile Action Based evaluated exercise demonstration, IP 71114.07 "Exercise Evaluation - Hostile Action (HA) Event," is performed in lieu of IP 71111.01.**

END

ATTACHMENT 1

PRIORITIZATION OF ADDITIONAL AREAS FOR INSPECTION

General

In general, NRC oversight in EP is focused on adherence to the E-Plan with an emphasis on these most risk-significant areas, and inspection resources should be deployed in a manner to cover these areas. However, within the constraint of resources, a broad range of response areas should be inspected.

The inspector should use corrective action system data to identify response areas of concern and deploy inspection resources accordingly. Areas, (e.g., OSC, field monitor teams) that have had few critique findings or more than average (as compared to the TSC or EOF) findings should be selected for observation. Inspection resources usually deployed in the TSC, EOF, or Control Room may be used to observe other areas should the inspector identify a need.

- If the licensee's performance in previous baseline inspections in these risk-significant areas in conjunction with its performance under the DEP PI indicates reliable acceptable performance within the licensee response band, inspectors should reduce the inspection sampling in those areas and instead use a portion of available inspection resources to sample a selection of less risk significant areas from Attachment 1 "Prioritization of Additional Areas for Inspection," regardless of the results of the review of critique findings.
- In order to facilitate review of critique related corrective actions, the inspector should request a corrective action system listing sorted for drill and exercise critique findings of the last 2-3 years. If possible, the findings should be sorted by response center.
- The inspector should remain alert to the impact that the licensee's performance in less risk-significant areas (e.g., staffing, training, etc.) may have on the licensee's performance of the risk-significant areas.

Prioritization of Additional Areas for Inspection

Guidance for deployment of inspection resources beyond the most risk-significant areas is provided below. These areas may generally be considered in order of importance. Selection for deployment of inspection resources should be based on knowledge of the program, previous problems and logistics.

- a. Adequacy of worker protection including accountability, evacuation, exposure authorization and thyroid protection, including actions during a hostile action [10 CFR 50.47(b)(10) & (11) and Sections IV.E and IV.I of Appendix E to 10 CFR Part 50].
- b. Adequacy of interface with offsite authorities (e.g., in the area of PAR communication and technical support). [10 CFR 50.47(b)(6) and Sections IV.A.7, IV.E.9, and IV.D of Appendix E to 10 CFR Part 50].

- c. Adequacy of arrangements for offsite resources responding to an emergency, including hostile actions, at the licensee's site [10 CFR 50.47(b)(6) and Section IV.A.7 of Appendix E to 10 CFR Part 50.]
- d. Ability to prioritize mitigation and assessment efforts to protect the public health and safety.
- e. Command and control [10 CFR 50.47(b)(1)].
- f. Ability to diagnose plant accident conditions, other than offsite consequences addressed in the risk-significant area discussion.
- g. Ability to formulate mitigating actions.
- h. Ability to implement mitigating actions (e.g., damage control teams) under accident conditions.
- i. Adequacy of communications between licensee facilities [10 CFR 50.47(b)(6) and Section IV.E.9 of Appendix E to 10 CFR Part 50].
- j. Accuracy and completeness of licensee-approved press releases [10 CFR 50.47(b)(7)].

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number
		<p>Essentially complete re-write of document structure to better align it with MC 0040, reduce material properly covered elsewhere, broke up large paragraph blocks into subparagraphs, transferred in guidance on critiques and identification of weaknesses from EP SDP that is better served in the IP,</p> <p>Removed "Inspection Bases" in accordance with IMC 0040 "Preparing, Revising and Issuing Documents for the NRC Inspection Manual" formatting expectations.</p> <p>Changes made to address final EP rulemaking including: scenario review per new attachment 71114.08; reference to ISG for classification timeliness; and included backup and alternate facilities to ERF review guidance.</p> <p>Revised discussion on prompting and changed phrase to coaching. Corrected text that implied that only RSPS weaknesses warranted discussion.</p> <p>Added new inspection requirement 02.04 and guidance section 03.04 to include "If the exercise scenario contains</p>		

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		<p>demonstration of strategies, procedures, and or guidance developed under § 50.54(hh)(2) observe and evaluate the implementation of these activities.”</p> <p>Trimmed 03.06 to remove guidance on how to process a failure to comply— covered in EP SDP. Expanded shortened citation of IV.F.2.f to restore text needed to understand scope.</p> <p>Added section 71114.01-05 “RERERENCE”</p> <p>Added Attachment 1</p>		