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March 31, 2000

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

RE: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Gentlemen:

Enclosed please find copies of the following emergency plan procedure revisions for Niagara Mohawk's Nine Mile Point Nuclear Station:

- EPMP-EPP-03, Revision 02, "EDAMS Program Maintenance"
- EPMP-EPP-05, Revision 03, "Emergency Preparedness Program Self Assessment"

These procedure revisions are being submitted as required by Section V to Appendix E of 10 CFR Part 50. Should you have any questions, please feel free to contact Mr. James D. Jones, Director of Emergency Preparedness at (315) 349-4486.

Very truly yours,

John T. Conway
Vice President Nuclear Generation

/dma

Enclosure

xc:

Mr. H.J. Miller, Regional Administrator, Region I (2 copies)
Mr. G. K. Hunegs, Senior Resident Inspector (1 copy)
Mr. P.S. Tam, Senior Project Manager, NRR (1 copy)
Ms. M.K. Gamberoni, Acting Section Chief PD-I, Section 1, NRR (letter only)
EP PPF

A045

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION
EMERGENCY PLAN MAINTENANCE PROCEDURE

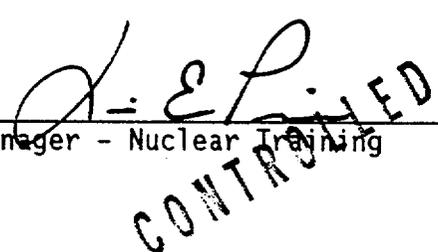
EPMP-EPP-03

REVISION 02

EDAMS PROGRAM MAINTENANCE

TECHNICAL SPECIFICATION REQUIRED

Approved by:
L. E. Pisano



Manager - Nuclear Training

14 MAR 00
Date

THIS IS A FULL REVISION

Effective Date: 03/20/2000

PERIODIC REVIEW DUE DATE FEBRUARY 2001

LIST OF EFFECTIVE PAGES

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1.0 PURPOSE

To provide guidance on the updating of EDAMS software.

2.0 PRIMARY RESPONSIBILITIES

2.1 Emergency Preparedness should obtain updated versions of EDAMS software, install updated software, edit user modifiable files and verify EDAMS operability after software changes.

2.2 NMPC Software Development should maintain the most recent controlled copy of EDAMS software and its associated documentation.

3.0 PROCEDURE

3.1 Updating EDAMS Software

NOTE: Step 3.1 should be performed upon receipt of any revision to EDAMS software.

3.1.1 Load revised software into EDAMS computer in accordance with Attachment 1.

3.1.2 Verify or modify the edams.ini file for the location and modem used in accordance with Attachment 2.

3.1.3 Reboot the computer.

3.1.4 Perform the following:

- a. Verify that the correct version number appears on the title screen.
- b. Verify proper acquisition of meteorological data by logging on to the system and obtaining most recent data.
- c. Verify proper operation of Raddose portion of EDAMS by running Raddose with simulated data and observing for proper output.
- d. Verify proper operation of the printer by printing results from any of the above steps.

3.2 Software Surveillance

Emergency Preparedness should perform Step 3.1.4 on an annual basis.

3.3 Documentation

Documentation of the performance of this procedure should be done via "memo to file".

4.0 DEFINITIONS

EDAMS - (Emergency Dose Assessment Modeling System) A PC - based dose assessment and meteorological data acquisition system used during emergencies.

5.0 REFERENCES AND COMMITMENTS

5.1 Licensee Documentation

5.1.1 EDAMS System Design Specification Manual

5.1.2 EDAMS Detailed Design Manual

5.1.3 EDAMS Operator Manual

6.0 RECORDS REVIEW AND DISPOSITION

6.1 The following records generated by this procedure shall be maintained by Records Management for the Permanent Plant File in accordance with NIP-RMG-01, Records Management:

- Memos to File documenting completion of this procedure.

6.2 The following records generated by this procedure are not required for retention in the Permanent Plant File:

- None

LAST PAGE

ATTACHMENT 1: INSTALLING EDAMS

1. Boot computer normally.
 2. Verify you are at the Windows desktop.
 3. Close any open programs before starting the installation process.
 4. Place EDAMS disk #1 in the A: drive.
 - a. For Windows NT, click "Start" and "Run", then type "a:\setup" at "Open" prompt and click "OK".
- OR
- b. For Windows 3.x, click "File" and "Run", then type "a:\setup" for the command line and click "OK".
 5. Follow the prompts to insert disks #2 and #3 to complete installation.
 6. Verify/Modify the edams.ini file per table in Attachment 2 of this procedure as applicable.

Location	"c:\RD5\edams.ini" Contents
<p>Control Room</p>	<pre> ; Port Settings for a Modem [Port_NMPModem] Comm Port=2 Settings=115200,N,8,1 DTREnable=-1 RTSEnable=-1 Handshaking=3 Echo(Duplex)=0 ; Local Modem Settings [Modem_NMPModem] ModemNumber=206 ModemName=Edams Compatible HighestBaud=115200 ; hayes InitString=AT M1 L0 W1 &D0 &C0 X4 &Q5 &K3 ^M ; us robotics ; InitString=AT M1 L0 &D0 &C1 X4 &M4 &K1 ^M Connect=CONNECT Attention=AT Hangup=ATHZ &C1 ^M Reset=ATZ^M Answer=ATA^M Dial=ATDT Busy=BUSY ; Port Settings for Direct Connect [Port_NMPDirect] Comm Port=1 Settings=9600,N,8,1 DTREnable=-1 RTSEnable=-1 Handshaking=0 Echo(Duplex)=0 [Codex_Modems] ModemPrompt= ModemPassword= DialSuffix=,,,829*0 DialPrefix= </pre>
<p>EOF</p>	<pre> ; Port Settings for a Modem [Port_NMPModem] Comm Port=1 Settings=115200,N,8,1 DTREnable=-1 RTSEnable=-1 Handshaking=3 Echo(Duplex)=0 ; Local Modem Settings [Modem_NMPModem] ModemNumber=206 ModemName=Edams Compatible HighestBaud=115200 ; us robotics InitString=AT M1 L0 &D0 &C1 X4 &M4 &K1 ^M ; hayes ; InitString=AT M1 L0 W1 &D0 &C0 X4 &Q5 &K3 ^M Connect=CONNECT Attention=AT Hangup=ATHZ &C1 ^M Reset=ATZ^M Answer=ATA^M Dial=ATDT Busy=BUSY [Codex_Modems] ModemPrompt= ModemPassword= DialSuffix=,,,829*0 DialPrefix=9,349 </pre>

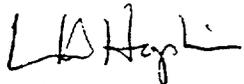
NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION
EMERGENCY PLAN MAINTENANCE PROCEDURE

EPMP-EPP-05

REVISION 03

EMERGENCY PREPAREDNESS PROGRAM SELF ASSESSMENT

TECHNICAL SPECIFICATION REQUIRED

Approved by: L. A. Hopkins	 _____ Plant Manager - Unit 1	<u>2/26/00</u> Date
Approved by: M. F. Peckham	 _____ Plant Manager - Unit 2	<u>3-2-00</u> Date

THIS IS A FULL REVISION

Effective Date: 03/09/2000

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1.0 PURPOSE

To define a self assessment program for the Emergency Preparedness program that will provide indication of program effectiveness and early identification of adverse trends.

2.0 PRIMARY RESPONSIBILITY

Emergency Preparedness Director (EPD) is responsible for the implementation of this procedure and the identification of issues that require corrective actions.

3.0 PROCEDURE

3.1 The EPD should ensure the completion of Attachment 5 in this procedure on a frequency in accordance with the attachment.

3.2 Activities selected for assessment should be evaluated against applicable performance criteria as defined in one or more of the following:

- NDD-EPP
- EIPs
- EPMPs
- Applicable NIPs
- NUREG - 0654
- NEI - 99-02

3.3 Performance indicators should be assessed as follows:

3.3.1 Drill/Exercise Performance (Reported to NRC)

- a. Indicator Definition: The percentage of drill, exercise and actual opportunities that were performed timely and accurately during the previous eight quarters
- b. Performance Indicator (PI) Data should be derived from the following events:
 - Actual Emergencies
 - Exercises
 - Drills that involve any ERO Initial Responders or Emergency Preparedness (EP) Staff

3.3.1 (Cont)

- c. Determine the following for each of the above events:
1. Number of expected Emergency Classification Levels (ECL)
 2. Number of ECLs declared accurately and timely, in accordance with EPIP-EPP-01/02.
 3. Number of expected notifications to the State and County for each initial and subsequent ECL.
 4. Number of notifications made accurately and timely to the State and County for each initial and subsequent ECL, in accordance with EPIP-EPP-20.
 5. Number of Protective Action Recommendation (PAR) Notifications required to be made to the State and County. This includes the initial PARs required upon entry into a General Emergency ECL, and subsequent PAR made as a result of dose assessment.
 6. Number of PARs made to State and County that were accurate and timely, in accordance with EPIP-EPP-08 and EPIP-EPP-20.
- d. Calculate the Drill/Exercise Performance PI as follows:
- Step 3.3.1.c.2, 4 and 6 for previous 8 quarters
Step 3.3.1.c.1, 3 and 5 for previous 8 quarters x 100
- e. Utilizing the result of Step 3.3.1.d, assign a color to the result as follows:
1. Green = 90% - 100%
 2. White = 70% - 90%
 3. Yellow = < 70%

3.3.2 Emergency Response Organization Drill Participation (Reported to NRC)

- a. Indicator Definition: Emergency Response Organization (ERO) Drill Participation is the percentage of key ERO members that have participated in a drill, exercise or actual event during the previous eight quarters, as measured on the last calendar day of the quarter
- b. PI data should be derived from the following events
- Actual Emergencies
 - Exercises
 - Drills that involve any ERO Initial Responders or EP Staff

3.3.2 (Cont)

- c. Key ERO Members are identified as:
- On-Shift SSS
 - Any ERO position that requires periodic participation in a drill or exercise as defined in NTP-TQS-202
- d. Determine the following for each of the above events for the last eight quarters:
1. Number of on-shift SSS participating
 2. Number of ERO positions requiring periodic drill participation in accordance with NTP-TQS-202
- e. Calculate the ERO Drill/Participation PI as follows:
- $$\frac{\text{\# Key ERO Members Participating in an Event During Previous 8 Quarters}}{\text{Total \# Key ERO Members}} \times 100$$
- f. Utilizing the result of Step 3.3.2.e, assign a color to the result as follows:
1. Green = 80% - 100%
 2. White = 60% - 80%
 3. Yellow = < 60%

3.3.3 Alert and Notification System Reliability (Reported to NRC)

- a. Indicator Definition: Alert and Notification System (ANS) Reliability is the percentage of ANS sirens that are capable of performing their function as measured by periodic siren testing in the previous 12 months.
- b. PI Data should be derived from the following periodic siren testing as defined in EPMP-EPP-08
- Bi-weekly Tests
 - Quarterly Tests
 - Annual Tests
- c. A successful siren test means that the results of periodic siren testing indicate that the siren was capable of sounding and, if applicable, rotating. SAMS feedback system errors do not necessarily preclude a successful siren test.

3.3.3 (Cont)

- d. Determine the number of successful siren tests from 3.3.3.b for the previous 4 quarters.

NOTE: A siren-test is the number of sirens times the number of times they are tested. For example, for the bi-weekly, 37 sirens are tested once each by OCEMO and the County Warning Point, resulting in 74 (37 x 2) siren tests.

- e. Calculate the ANS Reliability PI as follows:

$$\frac{\# \text{ Successful Siren Tests in Previous 4 Quarters}}{\text{Total \# Siren Tests in Previous 4 Quarters}} \times 100$$

- f. Utilizing the result of Step 3.3.3.e, assign a color to the result as follows:

1. Green = 94% - 100%
2. White = 90% - 94%
3. Yellow = < 90%

3.3.4 ERO Training Delinquency

- a. Indicator Definition: The number of ERO members delinquent in their training qualifications, as determined at the end of each month
- b. Using the ERO Training Delinquency Report generated each month, determine the number of ERO members delinquent in their required training.
- c. Utilizing the results of 3.3.4.b, assign a color to the results as follows:

1. Green: 0
2. White: 1-3
3. Yellow: > 3

3.3.5 ERO Initial Responder Position Vacancy

- a. Indicator Definition: The number of ERO Initial Responder positions that are vacant as assessed at the end of each month
- b. Utilizing the current ERO Duty Roster, at month's end, determine the number of vacant positions.
- c. Utilizing the results of 3.3.5.b, assign a color to the results as follows:
 1. Green: 0
 2. White: 1-2
 3. Yellow: > 2

3.3.6 Emergency Response Facility Equipment or Surveillance Deficiency Corrections

- a. Indicator Definition: The number of Emergency Response Facility (ERF), surveillance or equipment deficiencies not corrected in accordance with EPMP-EPP-02
- b. PI data should be derived from the following:
 - Review of EPMP-EPP-02 Surveillance or Inventory Sheets
 - DERs written as a result of deviation from the requirements of EPMP-EPP-02
- c. Determine the following for the above occurrences:
 1. Any deviations from the requirements of EPMP-EPP-02 that involve -
 - a. Failure to conduct required surveillance or inventory
 - b. Failure to correct surveillance or inventory deficiency in accordance with EPMP-EPP-02
- d. Using the results at 3.3.6.c, assign a color to the result as follows:
 1. Green: 0
 2. White: 1-2
 3. Yellow: > 2

3.3.7 ERO Notification Performance

- a. Indicator Definition: The number of ERO notification problems that result in the incorrect or untimely notification of the Nine Mile Point ERO
- b. PI data should be derived from any event in which the ERO notification system is used, including:
 - Actual Emergencies
 - Exercises
 - Drills
- c. The ERO notification system is comprised of:
 - Pager System
 - Automated Telephone Notification System
- d. Determine the following for each of the above events:
 1. The number of times each component of the ERO notification system was used
 2. The number of times the notification system was activated correctly and timely
- e. Calculate the ERO Notification Performance PI as follows:
$$\frac{\text{\# Times ERO Notification System Activated Properly and On Time for Last 8 Quarters}}{\text{\# Times ERO Notification System Used for Last 8 Quarters}} \times 100$$
- f. Using the results of 3.3.7.e, assign a color of the results as follows:
 1. Green: 98% - 100%
 2. White: 95% - 98%
 3. Yellow: < 95%

3.4 Unless otherwise noted, PIs should be calculated for an eight quarter period.

3.5 All PI results shall be assessed for possible DER generation in accordance with NIP-ECA-01.

4.0 DEFINITIONS

None

5.0 REFERENCES AND COMMITMENTS

- INPO 90-015: Performance Objectives and Criteria for Operating and Near-Term Operating License Plants
- NIP-ECA-05, Self Assessment
- NEI 99-02, Regulatory Assessment Performance Indicator Guideline
- NUREG-0654, FEMA-REP-1, Rev. 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants

6.0 RECORD REVIEW AND DISPOSITION

6.1 The following records generated by this procedure shall be maintained by Records Management for the Permanent Plant File in accordance with NIP-RMG-01, Records Management.

- None

6.2 The following records generated by this procedure are not required for retention in the Permanent Plant File:

- None

ATTACHMENT 1
Alert and Notification System Reliability Worksheet
 for

_____ Month or Quarter, _____
 Month or (1, 2, 3, 4) (Year)

1. Number of **bi-weekly** siren tests times 37:
 (Note: Tests from the EOC & 911 Center are considered separate tests) _____
2. Number of **quarterly** siren tests times 37: _____
3. Number of **annual** siren tests times 37: _____
4. Number of sirens *successfully passing* the **bi-weekly** tests: _____
5. Number of sirens *successfully passing* the **quarterly** tests: _____
6. Number of sirens *successfully passing* the **annual** tests: _____

ANS Reliability Performance Indicator Calculation

$$\frac{\text{Step 4} + \text{Step 5} + \text{Step 6}}{\text{Step 1} + \text{Step 2} + \text{Step 3}} \times 100 = \text{_____} \%$$

ANS Reliability Performance Indicator Calculation for the Previous 4 Quarters

Month	Result (%)
1)	
2)	
3)	
4)	
5)	
6)	
7)	
8)	
9)	
10)	
11)	
12)	

12 Month Average: _____ (%)

Performed By: _____ Date: _____

ERO Drill Participation Worksheet
for

Month or Quarter, _____

Month or (1, 2, 3, 4)

(Year)

1. Current Number of ERO responders required to participate in a drill every two years. ⁽¹⁾ _____
2. Total Number of on-shift SSS. ⁽²⁾ _____
3. Number of on-shift SSS participating in a drill/exercise/actual event in the last eight quarters. ⁽³⁾ _____

ERO Drill Participation Performance Indicator Calculation

$$\frac{\text{Step 1} + \text{Step 3}}{\text{Step 1} + \text{Step 2}} \times 100 = \underline{\hspace{2cm}} \%$$

Performed By: _____

Date: _____

NOTES:

- ¹⁾ * NTP-TQS-202 lists all the ERO positions that require 2-year drill participation.
 * The ERO Duty Roster is used to count the number of Initial Responders who are presently filling each of the positions requiring drill participation.
 * The ERO Training Due Report and Qualification List is used to count the number of secondary responders presently filling each of the positions requiring drill participation.
 * In accordance with NTP-TQS-202, anyone who has not met their ERO qualification requirement is no longer an ERO member. Therefore, 100% of all ERO responders have participated in a drill in the past two years.
- ²⁾ * This number is obtained by having the operations clerks for each unit review the SSS logs for the last (month) quarter. They need to make a list of every SSS who signed the log as the duty SSS, even if it was only for a short time. They also need to make a copy of one page from the logs with each signature on the list, as verification documentation for our files. This number may be different every (month) quarter, depending on SSS coverage.
- ³⁾ * The Training Record designator for drills/exercises is: EP-DRL-0-0-0-0 Rev.0
 * Note that the Training Record designator for Mini-Drills may change each year.
 For Example, In 1999 the Training ID and dates were:
 (For Unit 1): 01-OPS-009-TRA-1-83 on the following dates:
 08/03/99, 08/10/99, 08/17/99, 08/24/99, 08/31/99, 09/07/99
 (For Unit 2): 02-OPS-009-TRA-2-48 on the following dates:
 02/23/99, 03/02/99, 03/09/99, 03/16/99, 03/23/99
 * Actual Event participation can be retrieved from the event reports on file at EP.
SAVE ORIGINALS OR COPIES OF ALL DOCUMENTATION to be included in the verification documentation.

Drill / Exercise Performance Worksheet
for

Month or Quarter, _____

Month or (1, 2, 3, 4)

(Year)

Drill / Exercise / Actual Emergency Date(s):

- 1. Number of Emergency Classification Level (ECL) declarations: _____
- 2. Number of ECLs declared accurately and timely: _____
- 3. Number of expected notifications to the State and County for the initial and subsequent ECLs: _____
- 4. Number of notifications made accurately and timely to the State and County for the initial and subsequent ECLs: _____
- 5. Number of Protective Action Recommendations (PAR) required to be made to the State and County. (including initial PAR and subsequent PARs): _____
- 6. Number of PARs made to the State and County that were accurate and timely: _____

DEP Performance Indicator Calculation

$$\frac{\text{Step 2} + \text{Step 4} + \text{Step 6}}{\text{Step 1} + \text{Step 3} + \text{Step 5}} \times 100 = \underline{\hspace{2cm}} \%$$

Drill / Exercise Performance Worksheet

Previous Eight Quarter Performance Indicator Calculation

Quarter & Year	Performance Indicator Results (%)
8)	
7)	
6)	
5)	
4)	
3)	
2)	
1)	

Previous Eight Quarter Average: _____ %

Performed By: _____ Date: _____

ATTACHMENT 4

DATA REPORTING EXAMPLES (from NEI 99-02)

<i>Alert and Notification System Reliability</i>							
Quarter	3Q / 98	4Q / 98	1Q / 99	2Q / 99	3Q / 99	4Q/99	Prev. Q
Number of Successful Siren Tests in the Quarter	480	515	555	481	478	476	555
Total Number of Sirens Tested in the Quarter	481	518	555	481	481	479	555
Number of Successful Siren Tests Over 4 Quarters				2031	2029	1990	1990
Total Number of Sirens Tested Over 4 Quarters				2035	2035	1996	1996
				2Q / 99	3Q / 99	4Q/99	Prev. Q
Indicator Expressed as a Percentage of Sirens				99.8%	99.7%	99.7%	99.7%

<i>Emergency Response Organization (ERO) Participation</i>				
Quarter	2Q / 99	3Q / 99	4Q / 99	Prev. Q
Total Number of Key ERO Personnel	135	130	133	137
Number of Key Personnel Participating in a Drill in 8 Quarters	135	130	132	134
	2Q / 99	3Q / 99	4Q / 99	Prev. Q
Indicator Percentage of Key ERO Personnel participating in a Drill in 8 Quarters	100%	100%	99.2%	97.8%

<i>Emergency Response Organization Drill / Exercise Performance</i>									
Quarter	1Q/98	2Q/98	3Q/98	4Q/98	1Q /99	2Q/99	3Q/99	4Q/99	1Q/00
Successful Classifications, Notifications & PARs over quarter	0	9	58	14	45	0	47	27	7
Opportunities to Perform Classifications, Notifications & PARs in quarter	0	9	60	14	46	0	49	27	7
Total Number of Successful Classifications, Notifications & PARs in 8 Quarters								200	207
Total Number of Opportunities to Perform Classification Notifications & PARs in 8 Quarters								205	212
								4Q/99	1Q/00
Indicator Expressed as a Percentage of Opportunities to Perform Classifications, Notifications & PARs								97.6%	97.6%

ATTACHMENT 5: EMERGENCY PREPAREDNESS PERFORMANCE INDICATORS

Performance Area	Performance Indicator (Procedure Step)	Assessment Frequency	Performance Indicator Score	Criteria
Drill / Exercise Activities	Drill / Exercise Performance (3.3.1) (Reported to the NRC)	Each evolution Q	Green	90% - 100%
			White	70% - 90%
			Yellow	< 70%
	ERO Drill Participation (3.3.2) (Reported to the NRC)	Q	Green	80% - 100%
			White	60% - 80%
			Yellow	< 60%
Emergency Assessment and Notification	Alert and Notification System Reliability (3.3.3) (Reported to the NRC)	M Q	Green	94% - 100%
			White	90% - 94%
			Yellow	< 90%
	ERO Notification Performance (3.3.7)	M	Green	98% - 100%
			White	95% - 98%
Emergency Response Organization and Administration	ERO Training Delinquency (3.3.4)	M	Green	0
			White	1 - 3
			Yellow	> 3
	ERO Initial Responder Vacancy (3.3.5)	M	Green	0
			White	1 - 2
			Yellow	> 2
Emergency Facilities and Equipment	ERF Equipment or Surveillance Deficiency Corrections (3.3.6)	M	Green	0
			White	1 - 2
			Yellow	> 2