

August 29, 2000

MEMORANDUM TO: Cynthia A. Carpenter, Chief
Generic Issues, Environmental, Financial &
Rulemaking Branch
Division of Reactor Program Management, NRR

FROM: Joseph L. Birmingham, Project Manager/**RA**/
Generic Issues, Environmental, Financial &
Rulemaking Branch
Division of Reactor Program Management, NRR

SUBJECT: SUMMARY OF MEETING WITH NUCLEAR ENERGY INSTITUTE AND
INDUSTRY ON THE SIGNIFICANCE DETERMINATION PROCESS IN
THE EMERGENCY PREPAREDNESS AREA

In a public meeting on August 17, 2000, staff of the U.S. Nuclear Regulatory Commission (NRC) met with representatives of the Nuclear Energy Institute (NEI) to discuss several proposed "Frequently Asked Questions" (FAQs). Attachment 1 lists those attending the meeting. Attachment 2 lists FAQs with proposed resolutions.

The FAQs concerned the appropriateness of methods of collecting Performance Indicator (PI) data. Several of the FAQs were resolved. These FAQs will be considered during a routine public meeting between the full NEI Steering Committee and the NRC Inspection Program Branch and published. Also discussed was the consistent implementation of the Revised Reactor Oversight Process inspection program. This included the confidentiality of scenarios and the level of detail required for simulator scenario review by inspectors.

Having no other items to discuss the meeting was adjourned.

Project No. 689
Attachments: As stated
cc: See list

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DATE	08/28/00	08/28/00	08/28/00	08/29/00

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Distribution: Mtg. Notice w/NEI re FAQs in the EP Area Dated August 17, 2000
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RSullivan

KGibson

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JBirmingham

List of Attendees for August 17, 2000, Meeting
Significance Determination Process in the Emergency Preparedness Area

NAME	ORGANIZATION
Alan Nelson	NEI
Deann Raleigh	SERCH/Bechtel Power
Charles Willbanks	NUS Information Services
Kathy Halvey Gibson	NRC/NRR/DIPM/IOLB
Randy Sullivan	NRC/NRR/DIPM/IOLB

During the public meeting between NRC and NEI on 8/17/00 the following Frequently Asked Questions (FAQs) were drafted. These FAQs will be reviewed in a future public meeting between NRC and the industry committee on Revised Reactor Oversight Process (RROP), revised as appropriate and issued.

1.0 ANS

During a scheduled siren test, a siren (or sirens) fail or cannot be verified to have responded to the initial test. A subsequent test is done to troubleshoot the problem.

- 1) Should the troubleshooting test(s) be counted as siren test opportunities?
- 2) Should failures during troubleshooting be considered failures?
- 3) Should post maintenance testing or system retests after maintenance be counted as opportunities?
- 4) If subsequent testing shows the siren to be operable (verified by telemetry or simultaneous local verification) without any corrective action having been performed, can the initial test be considered a success?

Response

- 1) No. These tests are not regularly scheduled tests because they are only conducted if there are siren failures.
- 2) No. These tests are not regularly scheduled tests because they are only conducted if there are siren failures.
- 3) No. These tests are not regularly scheduled tests because they are only conducted if there are siren failures.
- 4) Yes, but only if it is reasonably verified that the failure was in the testing equipment and not the siren control equipment, i.e., the siren would have sounded when called upon, even though the testing equipment would not have indicated the sounding. In the process of verifying that the failure is only with testing equipment, items such as radio signal transmission weakness or intermittent signal interference should be ruled out. Maintenance records should be complete enough to support such determinations and validation during NRC inspection.

2.0 ANS

Siren systems may be designed with equipment redundancy or feedback capability. It may be possible for sirens to be activated from multiple control stations. Feedback systems may indicate siren activation status, allowing additional activation efforts for some sirens.

- 1) A siren system has two normally attended control stations from which the system may be activated. If a siren test from one station is unsuccessful can a test performed from the second station be considered as a part of the regularly scheduled test?

- 2) A siren test technician sent multiple activation signals to a siren that initially appeared not to respond. The siren responded. Can the multiple signals be considered as the regularly scheduled test and hence a success?

Response

- 1) Yes, if the use of redundant control stations is in approved procedures and is part of the actual system activation process. A failure of both systems would only be considered one failure, where as the success of either system would be considered a success.

If the redundant control station is not normally attended, requires set up or initialization, it may not be considered as part of the regularly scheduled test. Specifically, if the station is only made ready for the purpose of siren tests it should not be considered as part of the regularly scheduled test.

- 2) Yes, if the use of multiple signals is in approved procedures and part of the actual system activation process.

3.0 ERO Drill Participation

NEI 99-02, Rev 0, page 100, lines 11-15, discusses the role of communicators (TSC and EOF), who provide offsite notifications. A site has identified the TSC and EOF senior managers as communicators for the purposes of the tracking drill participation. These individuals ultimately approve all offsite communications from their respective facilities, however, they do not collect data for the notification form. The licensee's basis is that NEI 99-02 addresses the desire to not track "phone talkers".

- 1) Is this an appropriate interpretation of 99-02?

Response

- 1) No. The expectation of 99-02 is that the participation of the communicators responsible for collection of timely and accurate data for the notification form will be tracked. However, there are cases where the position responsible for approval (the senior managers in the above example) actually collects the data for the form, approves it and hands it off to a phone talker. Where this is the case, the senior manager is also the communicator and the phone talker need not be tracked.

4.0 ERO and DEP Scenario Confidentiality

A licensee used the same scenario for each of the three response teams. The drills contributed to DEP and ERO statistics. Repetitive use of the scenario has the potential to skew the PI success rate if scenario confidentiality is not maintained. There was no indication that drill participants were intentionally informing other teams about the scenario, but discussions of the drill could inadvertently reveal facts about the scenario.

- 1) Is it permissible to repeat the use of scenarios in drills that contribute to DEP and/or ERO statistics?
- 2) What is the NRC expectation with regard to scenario confidentiality?

Response

- 1) Yes, if a reasonable level of scenario confidentiality is maintained.
- 2) NRC does not expect the licensee to develop new scenarios for each drill or each team. However, it is expected that the licensee will maintain a reasonable level of confidentiality so as to ensure the drill is a proficiency-enhancing evolution. There are many processes for the maintenance of scenario confidentiality that are generally successful. These include confidentiality statements on the signed attendance sheets, spoken admonitions by drill controllers and the like. A reasonable level of confidentiality means that some scenario information could be inadvertently revealed and the drill still be a valid proficiency-enhancing evolution. However, it is expected that the licensee will remove from the statistics drill opportunities that were not valid due to scenario compromise and address the reasons for such a compromise.

Viewed from another perspective, the RROP SDP process can not address willful violation and similarly, the PI process can not address willful manipulation. Should NRC discover these conditions, the affected PI data could be considered as invalid and replaced with inspection.