

October 4, 2000

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

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

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

On September 21, 2000, staff of the U.S. Nuclear Regulatory Commission (NRC) met with representatives of the Nuclear Energy Institute (NEI), in a meeting open to public observation, to discuss issues on the Significance Determination Process (SDP) in the Emergency Preparedness area. Attachment 1 provides a list of those attending the meeting. Attachment 2 provides detailed notes from the meeting. Attachment 3 provides the Frequently Asked Questions (FAQs) discussed during the meeting and Attachment 4 contains the examples of different Event Notification Forms presented by NEI/industry during the meeting.

As described in Attachment 2, agreement was reached for several issues and the FAQs. New issues were identified for the next meeting which is scheduled for October 27, 2000. Having completed the discussion the meeting was adjourned.

Project No. 689

Attachments: As stated

cc w/atts: See next page

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MEETING SUMMARY (NRC-001)

PUBLIC	OGC	ACRS	SCollins/RZimmerman
BSheron	JJohnson	GTracy	BBoger/FGillespie
DMatthews/CAder	CCarpenter	JBirmingham	SWest
RSullivan	KGibson	MSatorius, EDO	

DOCUMENT: G:\RGE\JLB\MSUM NEI 99-02 EP Sept-21-00.WPD

OFFICE	DRIP/RGEB	DIPM/IOLB	DIPM/IOLB	DRIP/RGEB
NAME	JBirmingham:sw	RSullivan	KHGibson	SWest
DATE	09/26/00	09/26/00	09/29/00	10/04/00

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**List of Attendees for September 21, 2000, Meeting
Significance Determination Process in the Emergency Preparedness Area**

NAME	ORGANIZATION
A. Nelson	NEI
K. Gibson	NRC/NRR/DIPM/IOLB
R. Sullivan	NRC/NRR/DIPM/IOLB
L. Cohen	NRC/NRR/DIPM/IOLB
C. Anderson	Southern California Edison
K. Szeluga	New York Power Authority
F. Puleo	South Texas Project
V. Higaki	First Energy Corp
R. Kitts	Tennessee Valley Authority
M. Assaro	Public Service Electric & Gas
B. McBride	Dominion Generation
W. Lee	Southern Nuclear Company
M. Alford	Carolina Power & Light
L. Tkaczyk	Vermont Yankee
M. Vonk	Commonwealth Edison

MEETING NOTES
NRC/NEI PUBLICALLY OBSERVED MEETING
EMERGENCY PREPAREDNESS CORNERSTONE
SEPTEMBER 21, 2000

1. Introductions

See **Attachment 1** for attendee list. This meeting received strong industry support with ten individuals from various utilities representing over 20 nuclear plant sites contributing to the effort.

2. Frequently Asked Question (FAQ) 13.4 - to be reported back to Reactor Oversight Process (ROP) Steering Committee at 11:00 a.m.

Agreement was reached on this FAQ and it was presented to the Steering Committee. It is tentatively approved and will be posted on ROP website as such. The FAQ is included in **Attachment 3**.

3. FAQ 11.14, clarify expectations regarding siren test documentation

This FAQ was previously posted as tentatively approved, but NRC desired to revisit expectations for documentation of siren tests that were determined to be failures due to the testing process and not a failure of the actual siren activation system. There was consensus that documentation should be complete and maintained for NRC review. No change was necessary to the FAQ. The FAQ was marked as tentatively approved and will be posted on the NRC website for public comment prior to being considered as approved (approval automatic if no comments received). The FAQ is included in **Attachment 3**.

4. Expectations for accuracy on initial notification forms

The licensees provided several examples of initial notification forms describing the various positions on required accuracy for the forms (**Attachment 4**). There is a wide variation in the forms for each site because of the different information requested by the associated states. Discussion centered on what information on the forms should be reviewed for accuracy when determining the success rate reported under the Emergency Preparedness (EP) Drill/Exercise Performance (DEP) performance indicator (PI). Consensus was not reached but the industry working group offered to take the issue and make a proposal at the next meeting.

5. Emergency Response Organization (ERO) Drill Participation, onshift dose assessors and onshift communicators

NRC requested industry views on the difficulties of reporting onshift communicator participation in the ERO Drill Participation PI. Industry consensus was that while there were difficulties with initial implementation, these have passed and changes to the system at this point would be counterproductive.

NRC asked if it is appropriate to track the participation of onshift dose assessment personnel. Strong industry consensus was that this would not add value for the following reasons:

- The ERO PI represents a sampling of ERO member drill participation. There are several important members that are not tracked, but the overall PI provides sufficient information to indicate the extent of ERO participation in drills. It was never the intent of the PI to measure all ERO participation in drills. Said another way, worthy additions could be identified in all emergency centers, but the current sample is sufficient to achieve a meaningful PI.
- Many sites have automatic dose projection capability and/or a nomogram for estimating offsite dose. This being the case, the participation of onshift dose assessors is minimal.
- The typical structure of a drill that activates the ERO does not call for dose assessment by the onshift dose assessor. These functions are performed in the Technical Support Center and/or Emergency Operations Facility. If onshift dose assessors were added to the ERO PI, it would track the participation of an individual that does not perform the activities of interest. Drills could possibly be restructured, but with detriment to other drill objectives and burden to licensees. The EP PI program is not intended to drive the design of the drill program to accommodate the gathering of statistics.

6. Why are there so many FAQs for the EP Cornerstone?

The group discussed this from many angles and concluded that:

- EP programs are allowed to vary within the regulations and were individually approved. This variation causes implementation questions when national level assumptions are used to craft a PI.
- There has been turnover in EP with industry consolidation. This results in a need for learning among EP Coordinators and generates some FAQs that might not otherwise be necessary.
- ROP has focused NRC inspection resources in new directions and formalizes the contribution of resident inspectors. This focus results in a new regulatory emphasis which generated FAQs.
- The evaluation of opportunities under the EP PI program is essentially a human performance exercise. Identification of parameters for assessment of human performance necessitates robust guidance and hence the FAQs.

7. Experience with the EP Significance Determination Process (SDP)

Industry was asked if there were concerns over the white findings issued to date under the EP ROP. In particular, the rate seems higher than expected. Industry had no concerns. NRC asked that the working group consider a national level look at the SDP toward the end of initial implementation, but was asked to eliminate issues that were only the concern of a single site that received a finding.

8. Issues for next meeting

- Draft FAQ 12.5, (tracking communicators for ERO) as found on the ROP external web page, http://nrr10.nrc.gov/NRR/OVERSIGHT/ASSESS/draft_faqs.pdf.
- The industry's rendition of a FAQ on accuracy standards for initial notifications.
- Review of FAQs that are submitted by the next meeting.

9. Regional workshops, ROP implementation

The schedule for upcoming ROP implementation workshops was provided. The agendas are not available at this time but what was known about the workshops was offered.

RI,	12/12 & 13/00.
RII,	11/16/00
RIII,	10/3 & 4/00;
RIV,	11/15/00;

10. Other

The industry was asked if there was value in considering changing the Alert and Notification System (ANS) PI from reliability to availability, as this might better reflect the function of the sirens. There was strong consensus that this was not necessary. NRC is satisfied with the PI as it stands, but was willing to listen to change proposals if it would decrease unnecessary burden.

11. FAQ 13.3, siren system activation from multiple control stations

This FAQ was previously posted as tentatively approved, but NRC desired to revisit to ensure that the NEI task force had no issues with the FAQ. No change was necessary to the FAQ. The FAQ was marked as tentatively approved and will be posted on the NRC website for public comment prior to being considered as approved (approval automatic if no comments received). The FAQ is included in **Attachment 3**.

Frequently Asked Questions (FAQs) - Attachment 3,

FAQ 13.3, EP 13.3

Question

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?

Answer

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. However, the use of multiple activation signals to achieve successful siren tests may not include any activities outside the regularly scheduled test, such as troubleshooting, post maintenance testing or activation signals sent after the initial activation process has ended.

FAQ 13.4, EP 13.4

A licensee used 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.

Question

Is it permissible to repeat the use of scenarios in drills that contribute to DEP and/or ERO statistics?

Answer

Yes, the licensee need not 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. A reasonable level of confidentiality means that some scenario information could be inadvertently revealed and the drill remains a valid proficiency-enhancing evolution. It is expected the licensee will remove from the drill performance statistics any opportunities considered to be compromised.

There are many processes for the maintenance of scenario confidentiality that are generally successful. Examples may include the following:

- _ confidentiality statements on the signed attendance sheets,
- _ spoken admonitions by drill controllers.

Examples of practices that may challenge scenario confidentiality include:

- _ Drill controllers or evaluators or mentors, who have scenario knowledge becoming participants in subsequent uses of the same scenario,
- _ Use of scenario reviewers as participants.

FAQ 11.14, EP 11.14

Question

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 trouble shoot 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?

Answer

- 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 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 a problem with testing equipment, problems such as radio signal transmission weakness or intermittent signal interference should be eliminated as the cause. Maintenance records should be complete to support such determinations and validation during NRC inspection.