December 27, 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 NOVEMBER 30, 2000, EMERGENCY PREPAREDNESS ISSUE TASK FORCE MEETING

On November 30, 2000, the Nuclear Regulatory Commission (NRC), held a publically observed meeting with the Nuclear Energy Institute (NEI) Emergency Preparedness (EP) Issue Task Force, at NEI offices, to discuss Frequently Asked Questions (FAQs) and other issues important to the EP cornerstone of the NRC Reactor Oversight Process (ROP). The task force consisted of NRC and NEI staff members and industry emergency preparedness managers. Representatives from ten utilities and the Environmental Protection Agency participated in the meeting. Attachment 1 lists those in attendance. Attachment 2 is the meeting agenda.

After introductions by Randy Sullivan, NRC, and Alan Nelson, NEI, the group discussed the schedule of upcoming meetings. On December 6, 2000, the ROP NRC/NEI Performance Indicator (PI) Steering Committee will meet at NRC headquarters to review/approve FAQs. On January 18 and 19, 2001, NEI will hold an industry forum, limited to NEI members only, in Clearwater, Florida, to discuss lessons learned from the first nine months of the Reactor Oversight Process. Alan Nelson stated that the EP Task Force would not meet in December, 2000, but would meet in January, 2001, as part of the Industry Forum on ROP Lessons Learned.

The task force discussed several FAQs under review, Attachment 3. These FAQs were later presented to and accepted by the NRC/NEI PI Steering Committee on December 6, 2000.

Another issue discussed concerned communicator tabletop drills. A licensee conducted table top training for about 50 communicators and took credit for drill participation without meeting all the requirements of NEI 99-02, e.g., assessment for accuracy and timeliness and contribution of performance statistics to the Drill and Exercise Performance (DEP) PI. The group consensus was that although this may be good training, the PI program should not be modified to allow credit for this type of activity for the Emergency Response Organization (ERO) drill participation PI.

The group then looked at all of the FAQs approved for the EP Cornerstone, to determine whether they should be incorporated into the next revision of NEI 99-02, filed, or remain as

FAQs. The representative for Tennessee Valley Authority had performed a preliminary analysis for several FAQs and provided it to the group. The group was asked to categorize 45 FAQs into three groups:

- FAQs that should be incorporated into the clarifying notes
- FAQs that should remain as FAQs
- FAQs that should be placed in a historical file

The initial group consensus placed 29 FAQs into the historical file, identified eight FAQs that should be incorporated into the text and eight that should remain as FAQs. Alan Nelson volunteered to look at the two sets of 8 FAQs, with a smaller subgroup, to develop a draft for the revised NEI 99-02.

Tom Houghton of NEI, the PI project manager, discussed the next revision of NEI 99-02. He indicated that Revision 1 would supercede Revision 0 and that sidebars would be used to indicate the changes from Revision 0. He agreed that a historical file of FAQs would be appropriate.

Having completed the planned discussion the meeting was adjourned.

Project 689
Attachments: As stated
cc: See list

November 30, 2000 EP Task Force Meeting Attendees

A. Nelson	NEI
T. Houghton	NEI
R. Sullivan	NRC
L. Cohen	NRC
M. Hug	Southern California Edison
F. Puleo	South Texas Project
V. Higaki	First Energy Corp
R. Kitts	Tennessee Valley Authority
B. Marks	Tennessee Valley Authority
M. Azzaro	Public Service Electric & Gas
W. Lee	Southern Nuclear Company
C. Boone	Southern Nuclear Company
M. Maddox	Southern Nuclear Company
A. Chesley	Vermont Yankee
M. Alford	Carolina Power & Light
M. Vonk	Commonwealth Edison
R. Bickers	McGraw-Hill Publishing
E. Kuhr	Duke Power
A. Chowdhury	EPA

Attachment 1

Emergency Preparedness FAQ Issue Task Force
November 27, 2000
NEI Offices

8:30 AM – 4:00 PM
(Public Meeting)

Welcome – Introductions

Schedule – November 27, 2000

Purpose/Expectations – NRC, Industry Interactions

FAQ process

NEI – Lessons learned workshop January 18, 19, 2001

FAQs currently under review

1) 12.5 Communicator - NRC rewrite 11/21/00
   Discuss the contribution of statistics from communicator performance to ERO and DEP
2) 15.5 Accurate information – NRC rewrite
3) 15.6 After the Fact – 11/26/00
4) Siren Upgrade or Replacement – 11/08/00

Evaluate FAQs for inclusion in NEI 99-02

Evaluate and bin FAQs for disposition:

1) FAQs that should be incorporated in the clarifying notes (see TVA suggestions),
2) FAQs that should remain, and
3) FAQs that should be placed into a historical file (these FAQs might be considered startup FAQs that have been taken over by the learning process).

Summary and follow-up actions

NRC would be willing to consider holding a publicly observed meeting on the subject of DIE at some time in the not too distant future. NRC is open to hearing specific industry concerns on this subject, if there are any. This meeting would be observed by the public and would allow for all views to be expressed.

Next scheduled meeting

Attachment 2

FAQs discussed at meeting:

FAQ DEP, 15.5, EP01

Can a notification be considered accurate if some of the elements on that notification form are in error?

Industry Proposed Response:
Yes. NUREG-0654 specifies the required elements to be provided in initial notifications. Those elements are:

Class of emergency
Whether a release is taking place
Potentially affected population and areas
(and) whether protective measures may be necessary

If these elements are accurately completed, the critical elements necessary to address the public health and safety have been appropriately communicated. Inaccuracies in other information should be addressed through the corrective action process.

NRC Proposed Response:

Yes. NEI 99-02 indicates on page 91, line 27 that accuracy is defined by the approved Emergency Plan and implementing procedures. However, It is realized that functionally, some of the items on an initial notification form may not be significant in that mistakes in that information will not affect the offsite response. However, offsite response is not the only consideration. EP PIs allow the creation of a licensee response band by indicating the state of an EP program. The timeliness and accuracy of initial notifications is an indicator of the efficacy of licensee efforts in areas such as training and procedure maintenance. This being the case, the elements which should be assessed for accuracy on the initial notification include:

Class of emergency
EAL #
Description of emergency (brief description of the event causing the classification, not intended to include all plant conditions)
Wind direction and speed
whether offsite protective measures are necessary
whether a release is taking place
Date and time of declaration of emergency
whether the event is a drill or actual event
plant and/or unit, as applicable

It is understood that initial notification forms are negotiated with offsite authorities. If the approved form does not include these elements, they need not be added. Alternately, if the form includes elements in addition to these, those elements need not be assessed for accuracy when determining the DEP PI. It is, however, expected that errors in such additional elements would be critiqued and addressed through the corrective action system.

New FAQ

Siren Upgrade or Replacement – 12/04/00

Attachment 3

Discussion:

The ANS PI measures the percentage of ANS sirens that are capable of performing their safety function, as measured by periodic siren testing in the previous four quarters. NEI 99-02 states, "If a siren is out of service for maintenance or is inoperable at the time a regularly scheduled test is conducted, then it counts as both a siren test and a siren failure."

ANS systems are aging and many sites are considering and/or performing siren overhaul or system upgrade projects. The ANS PI threshold may impact project planning in an unintended manner. It is not the intent to create a disincentive for performing ANS overhaul or upgrade projects.

When sirens are out of service for such projects, it is expected that the utility arrange for back-up public alerting in the appropriate siren coverage areas. This support is typically provided by local offsite agencies and often involves route alerting. The acceptable time frame for allowing a siren to remain out of service for system upgrade or preventive maintenance should be coordinated with the cognizant offsite agencies. Based on the impact to local agencies and the ANS functionality, outage time frames should be minimized and specified in ANS Upgrade/Overhaul Project Documents. When the time frame is identified in advance as part of an upgrade or overhaul project, and back-up public alerting coverage agreed to by offsite agencies, regularly scheduled tests during the siren outage may be excluded from the ANS PI statistics. Deviations from the advance outage schedule would constitute unplanned siren reliability and siren-test failures outside of the preplanned outage window would be included in the PI. This modification of the PI is not intended for preventative or corrective maintenance, i.e., siren-test failures due to preventative or corrective maintenance must be included in the ANS PI.

Question:

If a siren is out of service during a planned overhaul or upgrade project does this need to count as both a siren test and a siren failure?

Response:

No, if the ANS overhaul or upgrade project meets certain requirements as delineated in the discussion section of this FAQ. However, the exclusion is not intended for preventative or corrective maintenance.

12.5, EP-01

NEI 99-02, Rev 0, page 100, lines 11-15, discusses the role of communicators who provide offsite notifications. A site has identified the TSC and EOF senior managers as communicators for the purposes of the tracking drill participation. The basis for this is that these senior managers are “responsible” for off site notifications because they approve them before they are communicated to off site agencies.

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

Answer

1) No. The expectation of NEI 99-02 is that the participation of communicators in drills will be tracked through the ERO Drill Participation PI. The communicator is the key ERO position that collects data for the notification form, fills out the form, seeks approval and usually communicates the information to off site agencies. Performance of these duties is assessed for

accuracy and timeliness and contributes to the DEP PI. The senior managers in the above example do not perform these duties and should not be considered communicators even though they approve the form and may supervise the work of the communicator.

However, there are cases where the senior manager actually collects the data for the form, fills it out, approves it and then communicates it or 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

FAQ DEP - Discover After the Fact, 11/30/00

15.6 (a) Indication of the event was available to the operators

A license may discover after the fact (greater that 15 minutes) that an event or condition had existed which met the emergency plan criteria but that no emergency had been declared and the basis for the emergency class no longer exist at the time of discovery. Indication of the event was available to the operators.

a) Should the condition described be considered as a missed classification opportunity?

b) Should the condition described be considered as a missed notification opportunity?

Response:

a) Yes, this classification was not timely.

b) No. NUREG 1022 describes the notification requirements for this consideration.

5.6 (b) Indication of the event was not available to the operators

A license may discover after the fact (greater that 15 minutes) that an event or condition had existed which met the emergency plan criteria but that no emergency had been declared and the bases for the emergency class no longer exist at the time of discovery. Indication of the event was not available to the operators. In determination of whether indications were indeed not available to operators, the timeliness of necessary calculations, verification efforts, etc. as required by EALs or physical reality, must be considered.

a) Should the condition described be considered as a missed classification opportunity?

b) Should the condition described be considered as a missed notification opportunity?

Response:

a) No, indication of the emergency was not available to operators until the basis for the emergency no longer existed.

b) No. NUREG 1022 describes the notification requirements for this consideration.

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Project No. 689
Attachments: As stated
cc w/atts: See list

Accession#ML
Template NRR-106

MEETING SUMMARY (NRC-001)

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

DOCUMENT: G:\RGEB\JLB\MSUM NEI 99-02 EP Nov-30-00.WPD

OFFICE	DRIP/RGEB	DIPM/IOLB	DIPM/IOLB	DRIP/RGEB
NAME	JBirmingham	RSullivan	KHalveyGibson	SWest
DATE	12/14/00	12/15/00	12/22/00	12/27/00

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