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United States Nuclear Regulatory Commission
ATTN: Document Control Desk
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RE: Nine Mile Point Unit 1
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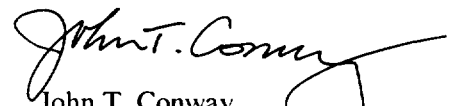
Gentlemen:

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

EPMP-EPP-05, Revision 07, "Emergency Preparedness Program Self Assessment"

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

Very truly yours,


John T. Conway
Vice President Nuclear Generation

SD/te

Enclosure

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

A045

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

EPMP-EPP-05

REVISION 07

EMERGENCY PREPAREDNESS PROGRAM SELF ASSESSMENT

TECHNICAL SPECIFICATION REQUIRED

Approved by:
L. E. Pisano



Manager - Nuclear Training

1/4/01

Date

CONTROLLED

THIS IS A FULL REVISION

Effective Date: 01/08/2001

PERIODIC REVIEW DUE DATE: JANUARY 2002

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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 development of performance indicators and self assessments in accordance with this procedure on a frequency in accordance with the Attachment 5.

3.2 NRC Performance Indicators (PIs) should be developed each month as follows:

3.2.1 Drill/Exercise Performance Indicator

- a. Calculate the Drill/Exercise Performance PI as indicated on Attachment 1.
- b. Utilizing the results of Attachment 1, assign a color to the result as follows:
 1. Green = 90% - 100%
 2. White = 70% - 90%
 3. Yellow = < 70%
- c. Report data to licensing in accordance with Attachment 4, "Emergency Preparedness Cornerstone Data" (Licensing Data Submittal Form).
- d. Report results of the assessment in accordance with EPMP-EPP-01.

3.2.2 Emergency Response Organization Drill Participation

- a. Calculate the ERO Drill/Participation PI as indicated on Attachment 2.
- b. Utilizing the results of Attachment 2, assign a color to the result as follows:
 1. Green = 80% - 100%
 2. White = 60% - 80%
 3. Yellow = < 60%
- c. Report data to licensing in accordance with Attachment 4, "Emergency Preparedness Cornerstone Data" (Licensing Data Submittal Form).
- d. Report the results of the assessment in accordance with EPMP-EPP-01.

3.2.3 Alert and Notification System (ANS) Reliability

- a. Calculate the ANS Reliability PI as indicated on Attachment 3.
- b. Utilizing the results of Attachment 3, assign a color to the result as follows:
 1. Green = 94% - 100%
 2. White = 90% - 94%
 3. Yellow = < 90%
- c. Report data to licensing in accordance with Attachment 4, "Emergency Preparedness Cornerstone Data" (Licensing Data Submittal Form)
- d. Report the results of the assessment in accordance with EPMP-EPP-01.

3.3 Self Assessment Activities should be developed each month as follows:

3.3.1 ERO Training Delinquency Assessment Activity

- a. Review the Training Due Report and determine the number of ERO members delinquent in their training/ qualifications.
- b. Utilizing the results of 3.3.1a, assign a color to the results as follows:
 1. Green: 0 ERO members delinquent
 2. White: 1-3 ERO members delinquent
 3. Yellow: > 3 ERO members delinquent
- c. Report the results of the assessment in accordance with EPMP-EPP-01.

3.3.2 ERO Initial Responder Position Vacancy Assessment Activity

- a. Determine the number of ERO positions as required by NIP-EPP-01, Attachment 1 that have been vacant >90 days, utilizing the ERO Duty Roster effective on the last day of the month.
- b. Utilizing the results of 3.3.2a, assign a color to the results as follows:
 1. Green: 0 ERO members delinquent
 2. White: 1-2 ERO members delinquent
 3. Yellow: > 2 ERO members delinquent
- c. Report the results of the assessment in accordance with EPMP-EPP-01.

3.3.3 Emergency Response Facility Equipment or Surveillance
Deficiency Corrections Assessment Activity

- a. Determine the number of deviations from the requirements of EPMP-EPP-02 that involve:
 - Failure to conduct required surveillance or inventory
 - Failure to correct surveillance or inventory deficiency in accordance with EPMP-EPP-02
- b. Using the results at 3.3.3a, assign a color to the result as follows:
 1. Green: 0
 2. White: 1-2
 3. Yellow: > 2
- c. Report the results of the assessment in accordance with EPMP-EPP-01.

3.3.4 ERO Notification Performance Assessment Activity

- a. Calculate the number of times each component of the ERO notification system was attempted to be activated for the month.
 - Automated telephone message system(CAN)via CAN printouts
 - Pager activations in accordance with EPMP-EPP-06.
- b. Determine the number of times each of the above items was successful.
- c. Calculate the assessment by dividing results of 'b' by the results from 'a' above.
- d. Using the results of 3.3.4.c, assign a color of the results as follows:
 1. Green: 98% - 100%
 2. White: 95% - 98%
 3. Yellow: < 95%
- e. Report the results of the assessment in accordance with EPMP-EPP-01.

3.4 All PI and self assessment activity results shall be assessed for possible DER generation in accordance with NIP-ECA-01.

4.0 DEFINITIONS

4.1 **Drill/Exercise Performance Indicator (DEP)** - The percentage of all drill, exercise and actual opportunities that were performed timely and accurately during the previous eight quarters. This data should be derived from any and all of the following:

- Actual Emergencies
- Exercises
- Drills that involve any ERO Initial Responders or Emergency Preparedness (EP) Staff

4.2 **Emergency Response Organization Drill Participation Indicator** - 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. This data should be derived from the following events

- Actual Emergencies
- Exercises
- Drills that involve any ERO Initial Responders or EP Staff

4.3 **Alert and Notification System Reliability Indicator** - 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. This data should be derived from the following periodic siren testing as defined in EPMP-EPP-08:

- Bi-weekly Tests
- Quarterly Tests
- Annual Tests

4.4 **Siren Tests** - the number of sirens at the site (37 at NMP) multiplied by the number of times they are tested. Example: 37 sirens tested 3 times [once by 911 Center and twice by Oswego County Emergency Management (OCEMO)] would equal 111 siren tests.

4.5 **Successful Siren Tests** - the sum of the sirens that performed their function (as described in EPMP-EPP-08) when tested. Example: If 37 sirens were tested by 911 and 1 failed, and 37 sirens were tested twice by OCEMO and 2 failed each time they were tested, the total successful siren tests would be equal to;
 $36(911) + 35(1st\ test\ OCEMO) + 35(2nd\ test\ OCEMO) = 106.$

- 4.6 **ERO Training Delinquency Assessment Activity** - The number of ERO members delinquent in their training/ qualifications, as determined at the end of each month using the ERO Training Due Report generated for that month.
- 4.7 **ERO Initial Responder Position Vacancy Assessment Activity** - The number of ERO Initial Responder positions that are vacant for >90 days as assessed at the end of each month using the ERO Duty Roster, effective on the last day of the month.
- 4.8 **Emergency Response Facility Equipment or Surveillance Deficiency Corrections Assessment Activity** - The number of Emergency Response Facility (ERF), surveillance or equipment deficiencies not corrected in accordance with EPMP-EPP-02. This 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
- 4.9 **ERO Notification Performance Assessment Activity** - The number of ERO notification problems that result in the incorrect or untimely notification of the Nine Mile Point ERO. The ERO notification system is comprised of the Pager System and the Automated Telephone Notification System (CAN). This data should be derived from any event in which the ERO notification system is used, including:
- Actual Emergencies
 - Exercises
 - Drills

5.0 **REFERENCES AND COMMITMENTS**

5.1 **Licensee Documentation**

None

5.2 **Technical Specifications**

None

5.3 **Standards, Regulations, Codes**

5.3.1 INPO 97-002, Performance Objectives and Criteria for Operating Nuclear Electric Generating Stations.

5.3.2 NEI 99-02, Regulatory Assessment Performance Indicator Guideline

5.3.3 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

5.4 **Policies, Programs and Procedures**

5.4.1 NIP-ECA-05, Self Assessment

5.4.2 NIP-EPP-01, Emergency Response Organization Expectations and Responsibilities

5.4.3 EPMP-EPP-01, Maintenance of Emergency Preparedness

5.4.4 EPMP-EPP-02, Emergency Equipment Inventories and Checklists

5.4.5 EPMP-EPP-08, Maintenance, Testing and Operation of the Oswego County Prompt Notification System

5.4.6 EPIP-EPP-08, Offsite Dose Assessment and Protective Action Recommendation

5.4.7 EPIP-EPP-20, Emergency Notifications

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.

- Attachment 1 - Drill / Exercise Performance Worksheet
- Attachment 2 - ERO Drill Participation Worksheet
- Attachment 3 - Alert and Notification System Reliability Worksheet
- Attachment 4 - Emergency Preparedness Cornerstone Quarterly Reporting Data

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

- None

LAST PAGE

ATTACHMENT 1: DRILL/EXERCISE PERFORMANCE WORKSHEET

Reporting Month or (1, 2, 3, 4) Qtr

Reporting Year

A. Complete one of these sheets for each event/drill/exercise.

B. Enter the Drill / Exercise / Actual Emergency Date:

C. Determine the following

1. Number of Emergency Classification Level (ECL) declarations: _____
Example: Typical drill, (UE, Alert, SAE, GE) would equal 4

2. Number of ECLs declared accurately and timely: _____
Example: If UE was not within require time frame or inaccurate do not count (Ref. EPIP-EPP-01/02)

3. Number of expected notifications to the State and County for the initial and subsequent ECLs: _____
Example: For each ECL, a Part 1 should be generated and transmitted

4. Number of notifications made accurately and timely to the State and County for the initial and subsequent ECLs: _____
Example: For each ECL, the Part 1 was accurately generated and transmission started within 15 minutes (Ref. EPIP-EPP-20)

5. Number of Protective Action Recommendations (PARs) required to be made to the State and County. (including initial PARs and subsequent PARs): _____
Example: If a GE was declared, a Part 1 should be generated indicating initial PARs and transmitted. Subsequent to the initial PARs additional PARs were made to update the initial PARs, this would indicate that the total should be two.

6. Number of PARs made to the State and County that were accurate and timely: _____
Example: If a GE was declared, a Part 1 was generated indicating accurate PARs, and transmission was started within 15 minutes. (Ref. EPIP-EPP-08)

D. Calculate the total for this sheet:

$$\text{Step 2} + \text{Step 4} + \text{Step 6} = \frac{\text{TOTAL}}{\text{TOTAL}} \times 100 = \text{ \% }$$

$$\text{Step 1} + \text{Step 3} + \text{Step 5} = \frac{\text{TOTAL}}{\text{TOTAL}}$$

ATTACHMENT 1 (Cont)

Previous Eight Quarter Performance Indicator Calculation

E. Complete the following for the eight (8) quarters:

	Summation of all data on all sheets in Column A (Step 2+4+6) from each month for the quarter	Summation of all data on all sheets in Column B (Step 1+3+5) from each month for the quarter
Year/Quarter _____ / _____		
_____ / _____		
_____ / _____		
_____ / _____		
_____ / _____		
_____ / _____		
_____ / _____		
_____ / _____		
Total		

- List months included or list quarter that this report is being completed for on line #1 and, remainder in receding order, ie. 4th, 3rd, 2nd qtr. Ensure supporting documentation is attached.

F. Calculate the following using data from the table above.

Column A Total= _____ x 100 = Previous Eight Quarter Average _____%

Column B Total= _____

Performed by: _____ Date: _____

Verified by: _____ Date: _____

ATTACHMENT 2: ERO DRILL PARTICIPATION WORKSHEET

INSTRUCTIONS

- A. Determine the number of key ERO members requiring biennial drill participation as follows:
- Determine the name and total number of "active" licensed SSSs. Place this number in the appropriate block under step 1 on NEI 99-02 Key ERO Member Worksheet.
Example: Unit 1 has 7 names listed as active SSSs, and Unit 2 has 9 names listed as active SSSs, enter a 16 in the column next to SSS/ED.
 - * This number is obtained for SSSs by having the SSS qualification training identification number run on the training system computer to obtain a print out. Contact the applicable unit OPS General Supervisor to verify each SSS showing current qualification is not disqualified for some other reason.
SSS Qual Card ID: OPS-SSTP-003-SSS-3-01
 - Obtain a copy of the ERO Duty Roster and the Training Due Report in effect on the last day of the month.
 - Determine number of individuals listed on the ERO Duty Roster or in the Training Due Report, filling each of the listed positions. Place this number in the appropriate block under step 1 on NEI 99-02 Key ERO Member Worksheet. *Example:* TSCM has 4 names listed on ERO Duty Roster filling that position, enter a 4 in the column next to TSCM.
 - * 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.
 - Obtain a training system report for each facility (TSC, OSC, EOF and control room/simulator) for each drill conducted over the past 2 years.
 - * The Training Record designator for drills/exercises is: **EP-DRL-(ERF)-0-0-0 Rev.0**
 - * Note that the Training Record designator for Mini-Drills may change each year.
- B. Determine the number of key ERO members who actually participated in a drill as follows:
- Review the training system report and determine if each ERO person listed on the duty roster and or the qualification/training matrix has had a drill within the past two years. Enter the associated number of personnel meeting the drill requirement for each position in the Step 2 column of the NEI 99-02 Key ERO Member Worksheet. *Example:* If only 3 Offsite Dose Assessment Managers (ODAM) completed the drill requirement in the past two years enter a 3 in the Step 2 column next to ODAM.
 - Review the event report files in the EP Permanent Plant Files and determine which SSS or ERO members participated in the event. These may also be used to satisfy the drill performance requirement.
- C. Calculate the data as follows:
- Place the total number from each column on "NEI 99-02, KEY ERO MEMBERS" where indicated on NEI 99-02, KEY ERO MEMBERS.
 - Retain copies of all documents used to complete this report in the PI file. Examples of documentation that should be included are: training system reports, ERO Duty Rosters, Training Due reports.

ATTACHMENT 2 (Cont)

NEI 99-02, KEY ERO MEMBERS

In order to meet the Emergency Preparedness Cornerstone for Emergency Response Organization Drill Participation, the following personnel are considered "Key ERO Members" in accordance with NEI 99-02, Rev. 0 and are required to meet the two-year drill participation requirement:

Key ERO Member as defined in NEI 99-02	Description from NEI 99-02 (and any supporting notes)	Key ERO Member as currently exists at 9 Mile Point	# on ERO Roster (Step 1)	# Mtg Drill Req. (Step 2)
Control Room (CR)				
Shift Manager Emergency Director	Supervision of reactor operations, responsible for classification, notification, and determination of protective action recommendations.	SSS/Emergency Director (SSS/ED)		
Shift Communicator	Provides initial offsite (state/local) notifications. (This is also the SSS's responsibility at 9 Mile Pt.)	SSS (SSS/ED)	N/A See Above	N/A See Above
Technical Support Center (TSC)				
Senior Manager	Management of plant operations/corporate resources.	Technical Support Center Manager (TSCM)		
Key Operations Support	(No description provided)	Technical Data Coordinator		
Key Radiological Controls	Radiological effluent and environs monitoring, assessment, and dose projections.	Radiological Assessment Manager		
Key TSC Communicator	Provides offsite (state/local) notification. (9 Mile does not perform this function out of the TSC)	N/A	N/A	N/A
Key Technical Support	(No description provided)	Technical Data Coordinator Nuclear Engineering Design Coordinator	N/A See Above	N/A See Above

ATTACHMENT 2 (Cont)

NEI 99-02, KEY ERO MEMBERS

Key ERO Member as defined in NEI 99-02	Description from NEI 99-02 (and any supporting notes)	Key ERO Member as currently exists at 9 Mile Point	# on ERO Roster (Step 1)	# Mtg Drill Req. (Step 2)
Emergency Operations Facility (EOF)				
Senior Manager	Management of Corporate Resources	Emergency/Recovery Manager (ED/RM)		
Key Protective Measures	Radiological effluent and environs monitoring, assessment, and dose projections.	Offsite Dose Assessment Manager and Dose Assessment Staff		
Key EOF Communicator	Provides offsite (state/local) notifications.	Communications Coordinator		
Operational Support Center (OSC)				
Key OSC Operations Manager	<i>(No description provided)</i>	OSC Coordinator		

ATTACHMENT 2 (Cont)

ERO DRILL PARTICIPATION WORKSHEET

Reporting Month or (1,2,3,4) Qtr _____

Reporting Year _____

A. Determine the following:

1. Current Number of Key ERO responders required to participate in a drill every two years. _____
(Total of Step 1, "NEI 99-02, KEY ERO MEMBERS")

2. Current Number of Key ERO responders required to participate in a drill who have participated in a drill/exercise/actual event during the previous 8 quarters. _____
(Total of Step 2, "NEI 99-02, KEY ERO MEMBERS")

B. Calculate the following:

$$\frac{\text{Step 2}}{\text{Step 1}} = \text{_____} \times 100 = \text{_____}\%$$

Performed by _____

Date: _____

Verified by _____

Date: _____

NOTE: SAVE ORIGINALS OR COPIES OF ALL DOCUMENTATION - to be included in the verification documentation.

ATTACHMENT 3: ALERT AND NOTIFICATION SYSTEM RELIABILITY WORKSHEET

Month

(Year)

- A. Complete one sheet for each month and indicate above the month and year.
- B. From data submitted by Oswego County Emergency Management determine the following:

1. The number of **bi-weekly** siren tests conducted in accordance with EPMP-EPP-08, Attachment 2.2: _____

2. The number of **quarterly** siren tests conducted in accordance with EPMP-EPP-08, Attachment 3.2: _____

NOTE: *SAMS activation and Intrac growl are considered separate tests.*

3. The number of **annual** siren tests conducted in accordance with EPMP-EPP-08, Attachment 4.2: _____

4. Number of sirens successfully passing the **bi-weekly** tests in accordance with EPMP-EPP-08, Attachment 2.2: _____

5. Number of sirens successfully passing the **quarterly** tests in accordance with EPMP-EPP-08, Attachment 3.2: _____

6. Number of sirens successfully passing the **annual** tests in accordance with EPMP-EPP-08, Attachment 4.2: _____

- C. Perform the following calculation using the information above:

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

$$\text{Step 1} + \text{Step 2} + \text{Step 3} = \frac{\text{_____}}{\text{TOTAL}}$$

ATTACHMENT 3 (Cont)

D. Using the data from Step C above, and from previous 4 quarters complete the following table.

	Column A Successful Tests Total = (Step 4+5+6)	Column B Siren Tests Total = (Step 1+2+3)
This month/year ____/____		
Month/Year ____/____		
Month/Year ____/____		
Qtr/Yr. ____/____ Total of Above		
Month/year ____/____		
Month/Year ____/____		
Month/Year ____/____		
Qtr/Yr. ____/____ Total of Above		
Month/year ____/____		
Month/Year ____/____		
Month/Year ____/____		
Qtr/Yr. ____/____ Total of Above		
Month/year ____/____		
Month/Year ____/____		
Month/Year ____/____		
Qtr/Yr. ____/____ Total of Above		
Total of all Qtrs indicated		

E. Transcribe the Qtr/Yr Data totals of column A and column B onto Attachment 4.

F. Using the data from above, complete the following calculation for the 12 month average.

$$12 \text{ month average } \% = \frac{\text{Total Column A} \quad \underline{\hspace{2cm}}}{\text{Total Column B} \quad \underline{\hspace{2cm}}} \times 100 = \underline{\hspace{1cm}} \%$$

Performed by _____ Date: _____

Verified by _____ Date: _____

ATTACHMENT 4: EMERGENCY PREPAREDNESS CORNERSTONE QUARTER DATA
(Licensing Data Submittal Form)

Data Reporting Elements	Qtr: Year:	Qtr: Year:	Qtr: Year:	Qtr: Year:	Qtr: Year:	Qtr: Year:	Qtr: Year:	Qtr: Year:	TOTAL	
Drill/Exercise Performance (DEP)										
Number of drills, exercises and actual event opportunities performed timely and accurately (Attachment 1, Column A)										
Number of drills, exercises, and actual event opportunities during the reporting quarter (Attachment 1, Column B)										
ERO Drill Participation (ERO)										
Total key ERO members that have participated in a drill, exercise or actual event in the last eight quarters (Attach. 2, Step 2)	Not Applicable									
Number of key ERO members at the end of the reporting quarter (Attach. 2, Step 1)										
Alert and Notification System Performance (ANS)										
Number of successful ANS siren-tests during reporting quarter (Attach. 3, Column A)	Not Applicable									
Total number of ANS sirens tested during the reporting quarter (Attach. 3, Column B)										

These results were determined using the guidance in NEI 99-02 Rev 0.

Completed by: _____

Verified by: _____

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 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%
			Yellow	<95%
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