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| * 0001 | MP       | PROC | EP  | EPDI 18<br>ADMINISTRATION OF NRC PERFORMANCE INDICATORS |       | 000 02   |          |        | P     | 01     |

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8/22/01  
Approval Date

8/23/01  
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# Document Action Request

SPG# 011206-124319

Initiated By: Tom Rigney Date 11/30/01 Department: EPSD Ext.: 6586

Document No.: EPDI-18 Rev. No.: 000 Minor Rev.: 02

Title: **ADMINISTRATION OF NRC PERFORMANCE INDICATORS**

Reason for Request/Action (attach commitments, CRs, ARs, OEs etc)

A/R - 01005277-02 (CR-01-07137)

Continued

Select one (See MP-05-DC-SAP01 sect 2.3 to determine type of change)

Intent Change (SQR Independent, RCD, Env Screen Required)  
Other reviews may be required. See MP-05-DC-FAP 01.1 att 3

Edit Corr.:

Non-Intent Change  
(Only SQR Independent Review and Env. screen Required)

### Editorial Correction Approval

Plant Mgmt Staff Member - Approval

### TPC Interim Approval

(1) Plant Mgmt Staff Member Print/Sign/Date

(2) SM/SRO/CFH Print/Sign/Date

### Procedure Request/Feedback Disposition

Priority:  Perform Now  Perform Later

Activity:  Revision  Minor Revision  Cleanup Rev  Biennial Review  Cancellation  Supercedure  
See DC-GDL01 for guidance

TPC  OTC  Place in VOID

| Reviews<br>continued <input type="checkbox"/> | Print  | Sign                 | Date     | SQR Qualified                       |                          |       | ✓ If<br>Comments |
|---|--|----------------------|----------|-------------------------------------|--------------------------|-------|------------------|
|   |  |                      |          | Yes                                 | No                       | Dept. |                  |
| <input type="checkbox"/>                      |  |                      |          | <input type="checkbox"/>            | <input type="checkbox"/> |       |                  |
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| 50.540  | <input checked="" type="checkbox"/> THOMAS RIGNEY  | <i>Thomas Rigney</i> | 12/11/01 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | EPSD  |                  |
| Environmental                                 | <input checked="" type="checkbox"/> THOMAS RIGNEY  | <i>Thomas Rigney</i> | 12/14/01 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | EPSD  |                  |
| Licensing Basis                               | <input type="checkbox"/>                           |                      |          | <input type="checkbox"/>            | <input type="checkbox"/> |       |                  |
| Independent                                   | <input checked="" type="checkbox"/> Thomas Gilbert | <i>Supp</i>          | 12/14/01 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | EPSD  |                  |

An NRRL Update Required  YES

#### 1. SQR Program Final Review and Approval

Approval  Disapproval

*Supp* 12/12/01  
SQR Qualified Independent Reviewer / Date

*Paul Bleasdale*  
Process Owner / Responsible Individual

12/12/01  
Approval Date

#### 2. SORC RI/PO Final Review and Approval

Process Owner / Responsible Individual Sign  
Meeting No.:

SORC Approval Signature

Approval Date

Effective Date: 12/14/01

EMERGENCY PLANNING SERVICES DEPARTMENT  
INSTRUCTION

**ADMINISTRATION OF NRC PERFORMANCE INDICATORS**

EPDI-18  
Rev. 000-02

Approval:

*Patricia A. Lueh for Paul Blawie 12/12/01*  
Manager, Emergency Planning  
Services Department

Effective Date:

12/14/01

**Level of Use  
Information**

**Emergency Planning Services Department Instruction**

**Administration of NRC Performance Indicators**

**Table of Contents**

1.0 Purpose ..... 3

2.0 Responsibilities ..... 3

3.0 Precautions ..... 3

4.0 Instructions ..... 3

5.0 Review and Sign-off ..... 5

6.0 References ..... 5

7.0 Summary of Changes ..... 5

Attachment 1 Drill and Exercise Performance Evaluation Form

Attachment 2 Drill/Exercise Participation Evaluation Form

Attachment 3 Evaluator Guidelines

Attachment 4 Millstone SERO Key Position Matrix

Attachment 5 Millstone Alert and Notification System

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## 1.0 Purpose

### 1.1 Objective

This instruction provides the guidelines for the administration of the NRC Performance Indicator Program. This instruction tracks the three EP PI's including Drill & Exercise Performance (DEP), ERO Participation, and Alert & Notification Systems Reliability (ANS).

### 1.2 Applicability

This instruction applies to the Emergency Planning Services Department staff and personnel evaluating Performance Indicator (PI) activities.

## 2.0 Responsibilities

### 2.1 Process Owner, Emergency Planning Services Department

Responsible for ensuring that the items in Attachment 1 and Attachment 2 are maintained to track participation and performance during PI designated activities.

## 3.0 Precautions

### 3.1. PI Activity Designation

Activities that will be included in the NRC Performance Indicator data must be identified prior to the start of the activity. This will be done through a memo and will be maintained in the Performance Indicator file. Regularly scheduled quarterly and annual ANS tests will be used as input to the ANS PI.

## 4.0 Instructions

### 4.1 Drill/Exercise Performance

Opportunities for DEP must occur under specific conditions for the DEP to be valid. The drill or training evolution must be an evaluated forum for the DEP to count, and the expected results must be identified in advance.

A drill, exercise, or tabletop identifying that DEP will be evaluated and counted are the most common means. Simulator sessions that provide a test of the process for the Shift Manager and/or Shift Technicians may also be used. Regardless of the forum, the individuals involved must undergo a performance enhancing experience.

The information for evaluation can be reported in the drill and exercise report. This is normally filed in nuclear records as part of the evaluation package. Documentation using a Performance Evaluation Form (or equivalent) is also acceptable.

Both the expected and actual responses for Emergency Classifications and Protective Action Recommendations (PARs) will be documented on the evaluation form (Attachment 1, Drill and Exercise Performance Evaluation Form). Multiple classifications, PARs, and notifications can occur in one drill or exercise. According to NEI 99-02, a General Emergency Classification and a PAR are each a separate

opportunity. Each of these in turn creates a notification opportunity. Even though the notification may be documented using one form, it will count as two opportunities. The division exists because there are 15 minutes from the GE declaration to complete that notification, and a separate 15 minute requirement for notification of the PAR from the time of event declaration. If a General Emergency Classification notification is expected and missed, the follow-on PAR and notification of the PAR may still be counted as successful as long as they are made correctly.

It is not necessary to have drills and/or exercises every quarter, so a report of zero opportunities and zero successes in a given quarter is both possible and acceptable.

An evaluation of timely and accurate performance for actual events will also be performed and reported as part of this indicator.

In the event a failure is observed, it is expected that remediation will occur as soon as possible. Remediation may occur through coaching or training, and documented on the Evaluation Form. However, the remediation will not count as another opportunity.

#### 4.2. Drill Participation

The key Millstone SERO positions which will be tracked for drill participation are included in Attachment 4 "Millstone SERO Key Position Matrix". This matrix identifies the specific Millstone SERO position corresponding to the NEI 99-02 positions.

After the reporting period has closed, a listing of individuals currently assigned to the key SERO positions will be confirmed. After the roster has been validated, then participation has to be validated. The participation date is logged into an Excel spreadsheet that is maintained in the EPSD common drive under the folder "KPI's" For an individual to earn credit for drill participation, the individual must have been involved in a designated activity. For the positions performing DEP functions, the activity must have been evaluated in order for them to earn credit. For all others, the activity can be training or evaluated as long as it provides a meaningful opportunity to perform their functions.

An individual must be a player, coach, mentor or evaluator (e.g., controller) to receive credit for the position. Observation alone does not earn credit. If a person can fill more than one position, participation in one does not immediately qualify for participation in all positions.

The dates of participation will be documented on drill/exercise sign-in sheets (Attachment 2, Drill/Exercise Participation Evaluation Form) or on the DEP evaluation form (Attachment 1, Drill and Exercise Performance Evaluation Form). The dates will be tracked in the Excel spreadsheet. The sign-in sheets are filed with training records or

the drill report. Copies of the evaluation forms may also be made and placed with the report.

All positions may also receive credit for their performance in an actual activation of the emergency plan.

#### 4.3 Alert and Notification System

Millstone's siren system has regularly scheduled tests that will be included in this performance indicator. The regularly scheduled tests are conducted to test the ability of the sirens to perform their function. The tests are the quarterly silent and growl tests as well as the annual full-load test and are performed in accordance with the testing program. 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. A test failure results from a siren being inoperable for a given test as specified in MP-26-EPA-FAP08, "Public Alerting System Administration."

The number of tests conducted on each siren for a given quarter determines the number of tests reported (e.g., silent and growl tests performed on 100 sirens in a quarter results in 200 tests reported). Successful siren tests are the sum of all sirens that performed their function when tested (e.g., silent and growl tests). Attachment 5 reflects the current number of sirens tested and reported as performance indicators.

Tests performed for maintenance purposes are not counted in the performance indicator database

#### 5.0 Review and Sign-off

The results will be reviewed by a Team Lead and then reported to the Station NRC PI Coordinator using the appropriate form.

#### 6.0 References

6.1 NEI 99-02, Regulatory Assessment Performance Indicator Guidelines

6.2 NRC Inspection Procedure 71151, "Performance Indicator Verification".

#### 7.0 Summary of Changes

##### 7.1 Revision 000-02

Deleted Unit Supervisor position from Attachments 2 and 4.

Added additional lines to item 8 of Attachment 1.

Deleted signature requirement in "Position" column of Attachment 2.

Changed "U1 Shift Manager" to "U1 Certified Fuel Handler" in "Position" column of Attachment 2.

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Deleted "U2 TSCRE/U3TSCRE" and added a single "TSCRE" entry on Attachment 2.

Combined "U3 Shift Technician" and "EOF Shift Technician" lines into single entry on Attachment 2.

#### 7.2 Revision 000-01

Included additional detail in Section 4.3 to further define siren tests and failures.

Included a new Attachment 5 which defines the number of EPZ sirens per town to aid in quality control reviews of raw siren field data/logs.

**Attachment 1**

**Drill and Exercise Performance Indicator Evaluation Form**

1. Evaluation date/Scenario number: \_\_\_\_\_
2. Location:            Simulator/CR            TSC            OSC            EOF
3. Name of participant(s) (please print full name): \_\_\_\_\_
4. SERO Position(s): \_\_\_\_\_
5. Expected event opportunities and performance results:

| Expected Event Opportunities  |                    |                  |                 |
|---|--------------------|------------------|-----------------|
| Pre-determined by (Initial/Date) _____ / _____  |                    |                  |                 |
| Event   | EAL/PAR (Expected) | EAL/PAR (Actual) | SAT(s)/UNSAT(s) |
| UE  |                    |                  |                 |
| ALERT   |                    |                  |                 |
| SAE   |                    |                  |                 |
| GE  |                    |                  |                 |
| PAR   |                    |                  |                 |
| Revised PAR   |                    |                  |                 |
| Notifications   |                    |                  |                 |
| <b>Note:</b> Any unsuccessful performance shall be deemed UNSAT and remediated as soon as practical.  |                    |                  |                 |
| <b>Note:</b> Remediation will not count as an additional opportunity/success. Remediation of any UNSAT activity:<br>Evaluator/Instructor: _____ Date: _____ |                    |                  |                 |

**6. Documentation:**

|                             | UE<br>Time | Alert<br>Time | SAE<br>Time | GE<br>Time |
|-----------------------------|------------|---------------|-------------|------------|
| Event(s) known              |            |               |             |            |
| Event(s) classified         |            |               |             |            |
| Classification Notification |            |               |             |            |
| PAR Developed               |            |               |             |            |
| PAR Notification            |            |               |             |            |
| Revised PAR Recognized      |            |               |             |            |
| Revised PAR Developed       |            |               |             |            |
| Revised PAR Notification    |            |               |             |            |

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**7. PI Determination:**

| Total # Opportunities | Total # SAT | Total # UNSAT |
|-----------------------|-------------|---------------|
|                       |             |               |

**8. Comments/Explanations:** \_\_\_\_\_

\_\_\_\_\_  
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**9. Evaluator/Instructor: (Print)** \_\_\_\_\_ **Date:** \_\_\_\_\_  
(Signature) \_\_\_\_\_

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**Attachment 2  
NRC Drill/Exercise Participation Evaluation Form**

Date/Scenario #: \_\_\_\_\_

Positions Evaluated: \_\_\_\_\_

| PERFORMANCE<br>EVALUATED<br>(YES/NO) | PARTICIPATION<br>CREDIT<br>(YES/NO) | POSITION<br><br>(Print Name) |
|--------------------------------------|-------------------------------------|------------------------------|
|                                      |                                     | DSEO                         |
|                                      |                                     | ADEOF                        |
|                                      |                                     | MRCA                         |
|                                      |                                     | MRDA                         |
|                                      |                                     | U2ADTS                       |
|                                      |                                     | U3ADTS                       |
|                                      |                                     | U2MOSC                       |
|                                      |                                     | U3MOSC                       |
|                                      |                                     | U2MTSC                       |
|                                      |                                     | U2TSCME                      |
|                                      |                                     | U2TSCEE                      |
|                                      |                                     | U3MTSC                       |
|                                      |                                     | U3TSCME                      |
|                                      |                                     | U3TSCEE                      |
|                                      |                                     | TSCRE                        |
|                                      |                                     | U1 Certified Fuel Handler    |
|                                      |                                     | U2SM                         |
|                                      |                                     | U3SM                         |
|                                      |                                     | U3/EOF Shift Technician      |

Completed by: (Print) \_\_\_\_\_

Date/Time: \_\_\_\_\_ / \_\_\_\_\_

(Signature) \_\_\_\_\_

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**Attachment 3  
Evaluator Guidelines**

- A. Expected and actual responses for Emergency Classifications, Protective Action Recommendations (PARs) and Notifications will be documented on the evaluation form, as appropriate for the position(s) being evaluated.
- B. Multiple classifications and notifications can occur in one drill or exercise. According to NEI 99-02, a General Emergency declaration and a PAR are each a separate opportunity. Each of these in turn creates a notifications opportunity. Even though the notification may be documented using one form, it will count as two opportunities. The division exists because there are 15 minutes from the GE declaration to complete that notification, and a separate 15 minutes from the time of classification to communicate the PAR result.
- C. If a General Emergency Classification notification is expected and missed, the PAR and notification of that PAR may still be counted as successful as long as they are made correctly.
- D. In the event a failure is observed, it is expected that remediation will occur as soon as possible. Remediation may occur through coaching or training, and documented on the PI Evaluation Form. However, the remediation will not count as another opportunity.
- E. Acceptance Criteria:
  - 1. A classification is deemed satisfactory when it is classified correctly (including EAL #) and within 15 minutes of available information (necessary to classify).
  - 2. A PAR is deemed satisfactory when it is determined accurately and within 15 minutes of the General Emergency declaration or determination that a revised PAR is needed.
  - 3. Notifications are deemed satisfactory when timely and accurate.
  - 4. Notifications are deemed timely when:
    - a) The classification notification is initiated within 15 minutes of event declaration.
    - b) The PAR notification is initiated within 15 minutes of the classification or determination that a revised PAR is necessary.
  - 5. Classification notifications are deemed accurate when the Incident Report Form (IRF) includes:
    - a) DSEO approval
    - b) Correct incident classification, EAL number, posture code, time and date, applicable unit
    - c) Correct release of radioactive material status
    - d) Correct identification of event (e.g., drill, actual)
    - e) Correct wind direction and speed
  - 6. PAR notifications are deemed accurate when the State DEP PAR Transmittal Form includes:
    - a) DSEO approval
    - b) Correct time and date
    - c) Correct technical basis
    - d) Correct evacuation/shelter recommendations

**Attachment 4  
Millstone SERO Key Position Matrix**

| <b>MILLSTONE SERO KEY POSITION MATRIX</b> |   |   |
|---|---|---|
| <b>NEI 99-02 POSITION</b>                 | <b>NEI 99-02 DESCRIBED FUNCTION</b>   | <b>MILLSTONE KEY SERO COUNTERPART</b>   |
| Control Room Shift Manager                | Supervision of reactor operations and responsible for classification, notification and determination of PARs. | Control Room Shift Manager (SM)   |
| Control Room Shift Communicator           | Provides initial offsite (state/local) notification.  | Unit 3 Shift Technician (U3ST)  |
| TSC Senior Manager                        | Management of plant operations/corporate resources.   | Assistant Director of Technical Support (ADTS)  |
| TSC Key Operations Support                | Manages TSC operations and technical support.   | Assistant Director of Technical Support (ADTS)  |
| TSC Key Radiological Controls             | Radiological effluent and environs monitoring, assessment, and dose projection.                               | Manager of Radiological Consequences Assessment (MRCA)  |
| TSC Key Communicator                      | Provides offsite (state/local) notification.  | N/A for Millstone TSC SERO  |
| TSC Key Technical Support                 | Provide technical expertise.  | Manager of Technical Support Center (MTSC)<br>Technical Support Center Mechanical Engineer (TSCME)<br>Technical Support Center Electrical Engineer (TSCEE)<br>Technical Support Center Reactor Engineer (TSCRE) |
| OSC Key Operations Manager                | Manages Operational Support Center activities.  | Manager of Operational Support Center (MOSC)  |
| EOF Senior Manager                        | Management of Corporate resources.  | Director of Station Emergency Operations (DSEO)   |
| EOF Key Protective Measures               | Radiological effluent and environs monitoring, assessment, and dose projection.                               | Assistant Director of Emergency Operations Facility (ADEOF)<br>Manager of Radiological Dose Assessment (MRDA)   |
| EOF Key Communicator                      | Provides offsite (state/local) notification.  | Emergency Operations Facility Shift Technician (EOFST)<br>Director of Station Emergency Operations (DSEO)   |

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**Attachment 5**  
**Millstone Alert and Notification System**

| Community      | EPZ Sirens |
|----------------|------------|
| East Lyme      | 23         |
| Fishers Island | 6          |
| Groton City    | 8          |
| Groton Town    | 24         |
| Ledyard        | 8          |
| Lyme           | 5          |
| Montville      | 10         |
| New London     | 14         |
| Old Lyme       | 20         |
| Plum Island    | 3          |
| Waterford      | 37         |
| Total          | 158        |

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