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MP-05-DC-SAP01-001 Rev. 003-01 Page _____ of _____





Emergency Planning Performance Indicators MP-26-EPA-GDL01

Rev. 000

Approval Date: 2/21/02 Effective Date: 2/26/02



TABLE OF CONTENTS

1. <u>PURPOSE</u>	. 3
1.1 Objective	.3
1.2 Discussion	.3
2. INSTRUCTIONS	4
2.1 Drill/Exercise Performance	4
2.2 Drill Participation	6
2.3 Alert and Notification System	7
3. SUMMARY OF CHANGES	7
3.1 Revision 000	8

ATTACHMENTS

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4

Attachment 1 Drill and Exercise Performance Indicator Evaluation Form	9
Attachment 2 NRC Drill/Exercise Participation Evaluation Form	.11
Attachment 3 Evaluator Guidelines	. 12
Attachment 4 Millstone SERO Key Position Matrix	. 13
Attachment 5 Millstone Alert and Notification System	

MP-26-EPA-GDL01 Rev. 000 2 of 14

1. <u>PURPOSE</u>

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1.1 Objective

This guideline provides the supporting instructions for the administration of the NRC Performance Indicator (PI) Program.

1.2 Discussion

This guideline tracks the three Emergency Preparedness PIs including Drill & Exercise Performance (DEP), ERO Participation, and Alert & Notification Systems Reliability (ANS). This guideline applies to the Emergency Preparedness Department staff and personnel PI activities.

The Manager, Emergency Preparedness, is responsible for ensuring that the items in Attachment 1, "Drill and Exercise Performance Indicator Evaluation Form," and Attachment 2, "NRC Drill/Exercise Participation Evaluation Form," are maintained to track participation and performance during PI designated activities.

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.

2. INSTRUCTIONS

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2.1 Drill/Exercise Performance

NOTE

- Multiple classifications, PARs, and notifications may occur in one drill or exercise. General Emergency (GE) 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 is 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 GE 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.
- 2. Activity needs to be considered "a performance enhancing experience" to be considered a valid event.
- 2.1.1 Identify a drill or training evolution as an evaluated drill/exercise performance opportunity and document via memo or E-mail.
- 2.1.2 Identify expected results for drill or exercise and document using Attachment 1, "Drill and Exercise Performance Evaluation Form."
- 2.1.3 Conduct drill or exercise and document actual results on Attachment 1, "Drill and Exercise Performance Evaluation Form."
- 2.1.4 Refer To Attachment 3, "Evaluator Guidelines," and evaluate performance.
- 2.1.5 As part of the evaluation, ensure timeliness and accuracy of DEP processes are included in determination of performance adequacy.
- 2.1.6 Log results on Attachment 1, "Drill and Exercise Performance Evaluation Form," or in applicable drill report and send to Document Administration along with supporting documentation.

NOTE

Remediation can be done through coaching or training but the remediation is not to be counted as an additional DEP opportunity.

- 2.1.7 IF a failure is observed, perform remediation on the spot or as soon as possible after the activity. Document remediation on Attachment 1, "Drill and Exercise Performance Evaluation Form."
- 2.1.8 IF no drills or exercises are conducted in quarter, report zero opportunities and successes for that particular reporting period.
- 2.1.9 Review documentation for DEP activities for the quarter and determine ratio of successes versus opportunities.

MP-26-EPA-GDL01 Rev. 000 4 of 14 2.1.10 Provide results to Supervisor, Emergency Preparedness, for review. Manager, Emergency Preparedness, will approve results and forward to Station NRC PI Coordinator.

- End of Section 2.1 -

	MP-26-EPA-GDL01
1	Rev. 000
	5 of 14

2.2 Drill Participation

NOTE

- 1. 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.
- 2. All positions may also receive credit for their performance in an actual activation of the emergency plan.
- 2.2.1 Review drills, exercises, and training opportunities conducted in a particular quarter.

NOTE

For positions performing DEP functions (e.g., notification classification, PARs), individuals have to participate in a DEP evaluated activity to receive participation credit. Non-DEP related positions can receive credit for any activity deemed "efficiency enhancing" to perform their SERO function.

- 2.2.2 Refer To Attachment 4, "Millstone SERO Key Position Matrix," and document the names of each individual participating in the identified positions.
 - a. Complete Attachment 2, "NRC Drill/Exercise Participation Evaluation Form," for each applicable drill, exercise, or training activity.
- 2.2.3 Update Excel spreadsheet used to track participation with current names and dates of participants.
- 2.2.4 Review spreadsheet and determine SERO personnel who will exceed two year participation window and identify any actions to be taken.
- 2.2.5 Ensure all SERO members being given participation credit for the quarter have corresponding documentation via completed Attachment 2, "NRC Drill/Exercise Participation Evaluation Form," or drill/exercise/training attendance sheet.
- 2.2.6 Provide quarterly participation results to Supervisor, Emergency Preparedness. Manager, Emergency Preparedness, will approve and forward to Station NRC RI Coordinator.

- End of Section 2.2 -

MP-26-EPA-GDL01 Rev. 000 6 of 14 2.3 Alert and Notification System

NOTE

- 1. 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 which are performed in accordance with testing program procedures. A test failure results from a siren being inoperable for a given test procedure as specified in MP-26-EPA-FAP08, "Public Alerting System Administration."
- 2. Tests performed for maintenance purposes are not counted in the performance indicator results.

2.3.1 Obtain the monthly siren test results from siren test vendor/organization.

NOTE

The number of tests conducted on each siren in a given month determines the number of tests reported (e.g., silent and growl tests performed on 50 sirens result in 100 tests reported).

- 2.3.2 Check test results for accuracy and completeness.
- 2.3.3 Ensure that tests performed following repair or maintenance activities are not counted in the performance indicator test results.
- 2.3.4 At the end of each quarter, ensure that the number of sirens tested equals the number of performance indicator qualified sirens listed in Attachment 5, "Millstone Alert and Notification System."
- 2.3.5 Provide results of tests to Supervisor, Emergency Preparedness for review. Manager, Emergency Preparedness, will approve results and forward to station NRC PI Coordinator.

- End of Section 2.3 -

MP-26-EPA-GDL01 Rev. 000 7 of 14 3. SUMMARY OF CHANGES

3.1 Revision 000

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3.1.1 Rewrite to MM05 format. Formerly EPDI 18, "Administration of NRC Performance Indicators."

t.	MP-26-EPA-GDL01
	Rev. 000
	8 of 14

	(Sheet 1 of 2)		
. Evaluation date/Scen	ario number:		
. Location:	Simulator/CR	C OSC	EOF
. Name of participant(s	s) (please print full name):		
SERO Position(s):			
 Expected event opporresults: 			
Expected Event			
	I/Date)/		
	performance shall be deemed UNSA	,	
Event	EAL/PAR (Expected)	EAL/PAR (Actual)	SAT(s)/UNSAT
ALERT			
SAE			
GE			
PAR			
PAR Revised PAR		<u> </u>	

Attachment 1 Drill and Exercise Performance Indicator Evaluation Form

(Sheet 2 of 2)

6. Documentation:

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	UE	Alert	SAE	GE
	Time	Time	Time	Time
Event(s) known		······································		
Event(s) classified	-			-
Classification Notification				
PAR Developed		.		
PAR Notification				
Revised PAR Recognized				
Revised PAR Developed				
Revised PAR Notification				· · · · · · · · · · · · · · · · · · ·
7. PI Determination:				
Total # Opportunities		Total # SAT	Total # UNSAT	<u> </u>
8. Comments/Explanations	3:			
8. Comments/Explanations				
8. Comments/Explanations	:			
8. Comments/Explanations				
8. Comments/Explanations				
8. Comments/Explanations			-	

9.	Evaluator/Instructor: (Print)	Date:
	(Signature)	
		MP-26-EPA-GDL01
		Rev. 000
		10 of 14

Attachment 2 NRC Drill/Exercise Participation Evaluation Form (Sheet 1 of 1)

Date/Scenario #: _____

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ERFORMANCE EVALUATED (YES/NO)	PARTICIPATION CREDIT (YES/NO)	POSITION (Print Name)
(120/110)		DSEO
	,,,,,,,,	ADEOF
		MRCA
		MRDA
		U2ADTS
		U3ADTS
		U2MOSC
		U3MOSC
		U2MTSC
		U2TSCME
		U2TSCEE
	in the second	U2TSCRE
		U3MTSC
		U3TSCME
		U3TSCEE
		U3TSCRE
		U1Certified Fuel Handler
		U2SM
		U3SM
		U3/EOF Shift Technician
Completed by: (Print	t)	Date/Time: /
Signature)		
		MP-26-EPA-GDL01 Rev. 000
		11 of 14

Attachment 3 Evaluator Guidelines

(Sheet 1 of 1)

- 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

MP-26-EPA-GDL01 Rev. 000 12 of 14

Attachment 4 Millstone SERO Key Position Matrix

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(Sheet 1 of 1)

	MILLSTONE SERO KEY PO.	
NEI 99-02 POSITION	NEL99-02 DESCRIBED FUNCTION	MILLSTONE KEY SERO COUNTERPART
Control Room	Supervision of reactor operations and	Control Room Shift Manager (SM)
Shift Manager	responsible for classification,	
	notification and determination of	
	PARs.	
Control Room	Provides initial offsite (state/local)	Unit 3 Shift Technician (U3ST)
Shift	notification.	
Communicator		
TSC Senior	Management of plant	Assistant Director of Technical Support
Manager	operations/corporate resources.	(ADTS)
TSC Key	Manages TSC operations and	Assistant Director of
Operations	technical support.	Technical Support (ADTS)
Support		
TSC Key	Radiological effluent and environs	Manager of Radiological Consequences
Radiological	monitoring, assessment, and dose	Assessment (MRCA)
Controls	projection.	
TSC Key	Provides offsite (state/local)	N/A for Millstone TSC
Communicator	notification.	SERO
TSC Key	Provide technical expertise.	Manager of Technical Support Center
Technical		(MTSC)
Support		Technical Support Center Mechanical
		Engineer (TSCME)
		Technical Support Center Electrical
		Engineer (TSCEE)
		Technical Support Center Reactor Engineer (TSCRE)
OSC Key	Manages Operational Support Center	Manager of Operational Support Center
Operations	activities.	(MOSC)
Manager		
EOF Senior	Management of Corporate resources.	Director of Station Emergency Operations
Manager		(DSEO)
EOF Key	Radiological effluent and environs	Assistant Director of Emergency
Protective	monitoring, assessment, and dose	Operations Facility (ADEOF)
Measures	projection.	Manager of Radiological Dose Assessment (MRDA)
EOF Key	Provides offsite (state/local)	Emergency Operations Facility Shift
Communicator	notification.	Technician (EOFST)
		Director of Station Emergency Operations (DSEO)

MP-26-EPA-GDL01 Rev. 000 13 of 14

Attachment 5 Millstone Alert and Notification System

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(Sheet 1 of 1)

Community		EPZ Sirens
East Lyme		23
Fishers Island		6
Groton City		8
Groton Town		24
Ledyard		8
Lyme		7
Montville		10
New London		14
Old Lyme		20
Plum Island		3
Waterford		36
	Total	159

MP-26-EPA-GDL01
Rev. 000
14 of 14