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	Item	Facility	Type	Sub	Document Number / Title	Sheet	Revision	Doc Date	Copy #	Media	Copies
*	0001	MP	PROC	EP	MP-26-EPA-FAP03 DRILL AND EXERCISE IMPLEMENTATION		000			P	01

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2/13/02
Approval Date

2/14/02
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Document Action Request

SPG# 020201-082731

A

Initiated By: Thomas Rigney Date: 2/5/02 Department: EPD Ext.: 6586

Document No.: MP-26-EPA-FAP03 Rev. No.: 000 Minor 00

Title: Drill and Exercise Implementation

For New Documents only → ☐ QA RI Title Manager, EPD

B

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

Support MP-26-MMM

Continued ☐

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

C

☒ Intent Change *(Tech IR, 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 Tech IR, SQR IR and Env. signature Required)*

D

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

E

Procedure Request/Feedback Disposition

Priority: ☒ Perform Now ☐ Perform Later

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

☐ TPC ☐ OTC ☐ Place in VOID

F

Reviews continued ☒		Print	Sign	Date	SQR Qualified Yes	SQR Qualified No	SQR Qualified Dept.	✓ If Comments
50.54 q	☒	Thomas Rigney	Thomas Rigney	2/25/02	☒	☐	EPD	
Environmental	☒	Kathleen Burgess	Kathleen Burgess	2/25/02	☒	☐	EPD	
RCD	☒	Kathleen Burgess	Kathleen Burgess	2/20/02	☒	☐	EPD	
Licensing Basis	☐							
Tech Independent	☒	Paul Blasioli	Paul A Blasioli	2/25/02				

G

An NRRL Update Required ☒ YES

H

1. ☒ **SQR Program Final Review and Approval**

Approval ☒ Disapproval ☐

S M DeSilva 2/26/02
SQR Qualified Independent Reviewer / Date

Patrick Lilley
Dept Head / Responsible Individual

2/26/02
Approval Date

2 Final Review and Approval

☐ SORC ☐ RI/DH *(Ref Mans, GDLs, Handbooks)*

DH / RI Sign Meeting No

SORC Signature DH / RI Signature

Approval Date

I

Effective Date: 2/28/02

Document Action Request Continuation Page

SPG# 020201-082731

Initiated By: Thomas Rigney Date: 2/5/02 Department: EPD Ext.: 6586

Document No.: MP-26-EPA-FAP03 Rev. No.: 000 Minor Rev. 00

Title: Drill and Exercise Implementation

☐ Section B

☐ Section F

Reviews continued		Print	Sign	Date	SQR Qualified Yes	SQR Qualified No	SQR Qualified Dept.	✓ if Comments
Validation	☒	Steve Mazzola	Steve Mazzola	2/25/02	☐	☑	EPD	
Writer's Guide	☒	Megan McGuire	Megan McGuire	2/26/02	☑	☐	DA	
	☐				☐	☐		

Functional Administrative Procedure

Millstone Station

Drill and Exercise Implementation

MP-26-EPA-FAP03

Rev. 000

Approval Date: 2/26/02

Effective Date: 2/28/02

STOP THINK ACT REVIEW

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1. PURPOSE

1.1 Objective

This procedure includes instructions for implementing the Millstone Drill and Exercise Program. It includes information associated with drill and exercise planning, scenario development, participant preparations, implementation, evaluation, critiques, reports, and comment disposition and tracking.

1.2 Applicability

This procedure is used by Emergency Preparedness Department personnel to prepare for and conduct a drill or exercise. Not all steps of this instruction will be applicable for every drill or exercise. However, all steps should be reviewed for each drill or exercise to preclude omission of needed actions.

1.3 Supporting Documents

1.3.1 10 CFR 50.47(b) and 10 CFR 50, Appendix E

1.3.2 NUREG-0654/FEMA-REP-1, Rev. 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness for Nuclear Power Plants, November 1980, and SUPP. 1, Criteria for Utility Off-site Planning and Preparedness, September 1988.

1.3.3 NRC Inspection Procedure 71114, Reactor Safety - Emergency Preparedness.

1.3.4 NRC Inspection Procedure 71151, Performance Indicator Verification.

1.3.5 NEI 99-02, Regulatory Assessment Performance Indicator Guideline.

1.3.6 State of Connecticut Radiological Emergency Response Plan.

1.3.7 State of Rhode Island Radiological Emergency Response Plan.

1.3.8 IN 98-08

1.3.9 MP-16-CAP-SAP01, "Condition Report Initiation"

1.4 Discussion

The Drill and Exercise Program described in this procedure is required by the regulatory process governing the licensing of nuclear power plants. The Federal Emergency Management Agency (FEMA) and the Nuclear Regulatory Commission (NRC) cooperate to ensure that adequate emergency response capabilities exist, both on-site and off-site, for every nuclear power plant. Federal regulations and guidance material specify requirements and the roles of FEMA and the NRC in administering them.

A licensee's requirements for conducting drills and exercises are stated in 10 CFR 50.47(b) and 10 CFR 50, Appendix E. Additionally, regulatory guidance is contained in NUREG 0654/FEMA-REP-1, Rev. 1. The NRC evaluates the effectiveness of a licensee's program in accordance with Inspection Procedures.

Under 44 CFR 350 and NUREG 0654, Section N, it is the responsibility of State and Local governments to conduct joint drills and exercises to test their radiological emergency preparedness plans as a condition of initial and continued FEMA approval of those plans.

While this administrative procedure primarily concerns itself with the requirements related to drills and exercises conducted by Millstone Station, it also describes actions needed for the effective preparation and implementation of joint drills and exercises. As requested, Millstone will assist the States with maintenance of their 6-year exercise objective/evaluation area demonstration plan.

2. INSTRUCTIONS

NOTE

1. Emergency Preparedness is responsible for developing, approving, and issuing the Drill Schedule for the year. It is critical that the drill schedule be approved and issued as early in the first quarter of the year as possible (or preferably in the fourth quarter of the previous year) to allow the Station and the Station Emergency Response Organization (SERO) sufficient time to reserve applicable dates.
2. In general, the selection of dates for drills and exercises controls the development and milestone dates. There is a six-year period that establishes a cycle where all performance objectives must be successfully demonstrated at least once. The objectives were derived from the planning standard criteria contained in NUREG-0654.

2.1 Scheduling Drills and Exercises

Drill and Exercise Manager

2.1.1 Consider the following when developing a draft drill and exercise schedule:

- A review of Attachment 5, "Recurring Drill and Exercise Requirements."
- A review of the six year objective cycle matrix and objective demonstration requirements.
- Desires of the state and local governments to participate in drills.
- Any additional drills that have been identified by the Manager, Emergency Preparedness Department (EPD), on an as-needed basis.
- Scheduled outage and maintenance activities.
- Simulator availability (including time for scenario development).
- Unscheduled activities - check with key managers.
- Station initiatives - check with Millstone senior management.
- Plant personnel training schedules.
- School vacations.
- State, Federal, Religious holidays.
- National, State, Local event days.

2.1.2 Determine the scope of the drills and exercises based on the following items:

- The scope of drills should be designed to practice, demonstrate or test one or more elements of the Millstone Emergency Plan. Emphasis will be on the effectiveness of personnel, procedures, and actual use of emergency facilities and equipment.
- Drills and exercises should be developed to provide an opportunity to demonstrate implementation of corrective actions in response to previous drill or exercise deficiencies, where appropriate.
- Drills and exercises should be developed to satisfy state, local, and Federal regulatory and drill requirements.
- Partial participation exercises should place emphasis on realistic scenarios that do not require a significant release of radioactivity to the off-site environs.
- Some scenarios should be developed to provide the operating staff the opportunity to diagnose and correct problems.
- Periodic individual facility or response area drills should be conducted to provide a focused review and evaluation on a specific facility or subject area.

2.1.3 Ensure drill and exercise schedule is reviewed and approved by the Manager, EPD.

2.1.4 Include key departments (i.e., Operations, Operator training, Work Planning, etc.) in the review process and selected dates.

2.1.5 Ensure Simulator dates are reviewed and assigned for scheduled drills by Operator Training.

2.1.6 Once drill and exercise schedule has been approved, distribute to station and SERO.

2.1.7 Provide schedule to local and state officials with an invitation to participate in applicable drills as they desire.

- End of Section 2.1 -

2.2 Drill and Exercise Schedule Modifications

Manager, EPD

2.2.1 Review and approve modifications to the drill and exercise schedule as necessary.

Drill and Exercise Manager, EPD Supervision

2.2.2 Respond to any required activities associated with modifications to the approved drill and exercise schedule, including the following:

- Development of scenario data
- Modifications to scenario data
- Rescheduling/notification to participants,
- Rescheduling/notification of applicable federal, state, or local agencies.

2.2.3 If the modification involves a federally evaluated Drill or Exercise, notify Licensing as soon as the change is approved.

Drill and Exercise Manager

2.2.4 WHEN modification to schedule is approved, perform the following:

- Distribute to Station and SERO personnel.
- Distribute to local and state authorities with an invitation to participate in applicable drills as they desire.

2.2.5 Ensure that any follow-up or documentation actions associated with canceled drills are completed as warranted by the timing of the cancellation.

- End of Section 2.2 -

2.3 Periodic Reviews and Assessments

EPD

2.3.1 Annually update the Six-Year Objective Cycle matrix (maintained under separate file) to reflect the date on which successful completion of each SERO performance objective occurred during a particular year.

> **NOTE**
>
> Demonstration of exercise or drill objectives scheduled for evaluation in accordance with the 6 year objective cycle plan may be satisfied by the effective response and documentation of on-site and/or off-site staff to an actual emergency.

2.3.2 Provide credit to a particular objective when the following provisions of that objective are met in response to an actual emergency:

a. The emergency required a prompt and timely response and mobilization of key SERO staff responsible for implementing RERP emergency functions.

b. The emergency resulted in establishing communications among responding organizations.

c. The following documentation, describing the level of response and involvement of key SERO responders to the emergency, is available:

- Type of emergency
- Arrival times of responders and period of response
- Communications logs
- Emergency decisions made and implemented
- Emergency plan resources used
- A complete list of staff involved

d. The recorded response of an actual emergency event meets required drill or exercise objective criteria.

- End of Section 2.3 -

2.4 Scenario Package Development

Supervisor, Onsite

2.4.1 For each scheduled drill or exercise, designate a Drill and Exercise Manager to prepare a scenario package

> **NOTE**
>
> Each item listed in Attachment 7, "Scenario Package Outline Format," and Attachment 8, "Typical Drill/Exercise Tasks," is not applicable for every drill or exercise.

Drill and Exercise Manager

2.4.2 Refer To Attachments 7 and 8 for guidelines on the needed activities for scenario development.

2.4.3 In determining objectives and extent of play for a particular drill or exercise, consider the following:

- Review of drill and exercise reports
- Review of six-year objective matrix
- Level of state and local participation anticipated
- Regulatory requirements for biennial evaluated exercises

2.4.4 Complete a project schedule using the following guidelines:

- Scenario development needs to start at least 6 months in advance of a scheduled exercise date to ensure sufficient time for reviews and submittals.
- It is critical to finalize the objectives, extent of play, and drill/exercise needs of the State (OEM/DEP) as early in the process as possible. This information is a key piece of the basis needed for scenario package development.
- State agencies (OEM/DEP) require a minimum of 2 weeks to review the final draft scenario and provide comments.
- Refer to Attachment 3, "Recommended Schedule Guidelines for Training Drill Scenario Development," and Attachment 4, "Recommended Schedule Guidelines for Exercise Scenario Development," for suggested milestones for developing training drill and exercise scenarios.
- The radiological data in the scenario requires the most time to develop. Radiological Engineering Services (RES) is assigned the responsibility of reviewing and approving radiological data. The following guidelines apply to developing radiological data:

  1) RES needs approximately 10 working days per scenario to complete all radiological data.

2) RES scenario writers need to be included in Simulator sessions conducted to develop and validate sequence of events.

3) Radiological data should be the last piece of the scenario developed because it is dependent on information contained in numerous other sections.

2.4.5 Submit project schedule to Manager, EPD.

Manager, EPD

2.4.6 Review and approve the project schedule.

Drill and Exercise Manager

2.4.7 Interface with onsite and off-site departments as follows:

- Obtain resources needed for scenario development.
- Conduct meetings to identify work tasks and completion dates, further clarify extent of play, define work task responsibilities between the various organizations, or resolve any conflict in drill and exercise implementation policies between the organizations.
- Ensure scenario writers have detailed knowledge of the area for which they are preparing the scenario material.
- Ensure scenario writers for operational and radiological data validate that the time-steps used for handouts are consistent (match) with the time at which key events occur in the scenario.

2.4.8 Develop scenario package sections in accordance with the outline described in Attachment 7 and tasks listed in Attachment 8.

2.4.9 Edit scenario packages to delete unnecessary sections or information.

2.4.10 Direct the development of the scenario package sections in accordance with the approved project schedule; activities will typically be conducted in the following manner:

a. Select the Drill or Exercise Project Team(s) with applicable representatives from Station organizations (including State personnel for off-site scenarios as needed).

b. Develop a draft of the proposed scenario timeline, which meets the needs of both the onsite and offsite player organizations.

c. Assign appropriate personnel for development of scenario package sections.

d. Following completion of development activities, assemble and distribute the draft scenario package to selected team members for final comment.

e. Obtain and resolve final scenario package comments.

2.4.11 Obtain required approvals of scenario packages.

2.4.12 Coordinate distribution of the exercise scenario, ensuring confidentiality requirements for exercise scenarios are maintained.

- End of Section 2.4 -

2.5 Drill And Exercise Preparation

NOTE

Because each drill or exercise is unique, the Drill and Exercise Manager may use the generic action list to create a detailed drill or exercise activity schedule.

2.5.1 Refer To Attachment 8, "Typical Drill/Exercise Tasks," for a generic action list for specific onsite and offsite drill/exercise activities.

2.5.2 Evaluate the need to have Nuclear Protection Services - Safety & Medical do a Hazards Analysis on any drill or exercise activities that may challenge a safety area (e.g., movement of contaminated injured individual, use of Human Performance Mockup, Security related activities).

2.5.3 Consider the following items when preparing for drill or exercise:

a. Provide specific requests for drill or exercise preparation support to appropriate state personnel, including assistance with the following:

1) Assigning and notifying personnel (by position),

2) Arranging use of designated facilities,

3) Distributing event reporting times and expected duration.

b. Evaluate the need to include assigned Controllers to simulate NRC Site Response Team as follows:

1) Consider assigning a Controllers team to one designated emergency response facility <u>per drill</u> to simulate NRC Site Response Team.

2) Assign Controllers to simulate full NRC Site Response Team participation in <u>at least one drill during the six year objective cycle</u>.

c. Conduct a pre-drill brief to instruct controllers and evaluators on assignments and responsibilities.

d. Ensure briefing materials include the following:

1) Safety Guidelines

2) Assignments and Responsibilities

3) For Performance Indicator (PI) designated drills or exercises, expected paperwork and acceptance criteria for assigned PI activities

4) Sequence of Events

5) Directions for stopping or terminating drill or exercise

6) Provisions for continuing and injecting data if drill should run past scheduled termination time

7) Expectations on post-drill activities and deliverables.

e. Conduct a pre-drill briefing with Simulator Operations crew and discuss extent of play and communications expectations with respect to Simulator.

f. Identify any needed control cells.

1) Coordinate with state OEM/DEP as needed and ensure there is sufficient control cell activity to support the state if they are participating.

2) Consider using the Connecticut School of Broadcasting for Joint Media Center Media Relations/Rumor Control activities.

3) IF control cells are used to simulate the NRC, Refer To IN 98-08 as a basis for sample questions to be asked.

g. For drills or exercises involving use of ENRS, Refer To Attachment 12, "ENRS Drill Checklist," and ensure the checklist is completed.

h. Request Manager, EPD or Supervisor, EPD determine whether drill or exercise is to be counted toward the PIs for EPD.

i. IF the drill is counted toward the PIs, file a memo identifying this fact.

- End of Section 2.5 -

2.6 Exercise Scenario Security

NOTE

The following personnel are authorized access to exercise scenario material provided they are not assigned as a player in the exercise:

- Manager, EPD
- Appointed Drill or Exercise Manager
- Appointed scenario development team members

Authorized individuals who are players should designate someone else to assume their responsibilities.

As appropriate to preparation requirements, these individuals may designate other personnel who should have access to scenario material (e.g., Administrative Support Staff, etc.). To the degree possible, exercise scenario preparation should be performed within EPD offices. Work areas should be designated and/or approved by the Drill or Exercise Manager.

2.6.1 Authorized Personnel For Scenario Preparation

Drill and Exercise Manager

a. Determine security and confidentiality measures needed for exercise scenarios.

b. Identify all exercise scenario documents, their containers, or cover sheets as "scenario-related" (regulatory submittal) or "confidential" (in-house).

2.6.2 Scenario Routing And Transmittals

a. Mail or hand-deliver exercise scenario material through a traceable delivery system (e.g., US Postal Service Registered Mail, overnight delivery service, etc.).

b. Transmit scenario material in a container (e.g., envelope, binder, box, etc.) that identifies the contents as "scenario information" or "confidential."

NOTE

Exercise scenarios are subject to technical, management, regulatory, state, and independent reviews and approvals. In some instances, the scenario will leave the direct control of Millstone personnel.

c. Notify reviewers and approvers verbally or in writing that the material being examined is confidential and not to be disclosed to unauthorized personnel.

2.6.3 Reporting Violations

NOTE

Examples of a compromise are:

- The scenario is known to multiple players and the removal of those players or the use of other participants is not feasible, or
- Parties not authorized by Millstone are in possession of the scenario.

Drill Personnel

a. Report the unauthorized disclosure of exercise scenario-related information to the Drill and Exercise Manager.

Drill and Exercise Manager

b. IF exercise scenario has been compromised, determine the impact of the disclosure on exercise confidentiality.

c. Recommend appropriate corrective actions to the Manager, EPD.

d. Report compromise to the NRC and/or FEMA.

Manager, EPD

e. Coordinate corrective actions with these agencies.

Drill and Exercise Manager

f. Refer To MP-16-CAP-SAP01, "Condition Report Initiation," and prepare a Condition Report (CR).

- End of Section 2.6 -

2.7 Drill And Exercise Evaluation

Drill and Exercise Manager

2.7.1 Conduct critiques following each drill or exercise to identify strengths, areas requiring corrective action, or areas for improvement (10CFR50.47(b)(14)/App E, IV, F).

2.7.2 Include feedback provided by SERO players followed by feedback provided by controllers.

2.7.3 Ensure players and controllers log comments on Attachment 11, "Player Controller Comment Form."

2.7.4 Ensure Lead Facility Controllers collect all documentation from players and controllers generated from the drill or exercise.

2.7.5 Ensure Lead Facility Controllers obtain all participants signatures on the attendance form to document participation credit.

NOTE

Lead Facility Controllers should be familiar with objective criteria forms and make determination on whether an objective was demonstrated.

2.7.6 For larger scale drills and exercises, conduct a Lead Facility Controller Critique to evaluate status of objective demonstrations.

NOTE

When conducting a series of drills (e.g., LORT combined drills), one condition report for "Areas for Improvement" may be used to capture all issues from the series of drills.

2.7.7 Generate one condition report for comments identified during the drill or exercise.

NOTE

Drill reports dealing with off-site agency responses (e.g., state and local) may be prepared at the discretion of Manager, EPD. Drill report distribution will be determined by the Manager, EPD.

2.7.8 Prepare, or direct preparation of, a report concerning SERO performance for each drill or exercise as follows:

a. Document the drill date and participating SERO organizations.

b. Note any drill program requirements being satisfied (e.g., a radiological monitoring drill, an HP drill, etc.) and the overall outcome.

c. Provide a brief summary of the scenario.

d. Evaluate SERO performance against selected drill or exercise objectives.

e. Discuss any major issues.

2.7.9 Using the drill reports, provide feedback to the SERO and Management on the results of a particular drill or exercise and the status of the comments identified.

2.7.10 Develop a list of Lessons Learned and provide to SERO members, as appropriate.

2.7.11 Develop and issue report within approximately 30 days of the date the drill or exercise was conducted.

2.7.12 For drills conducted in series, develop and issue the report within approximately 30 days of the last drill.

2.7.13 Develop additional vehicles for feedback to players, controllers, and management on the results of a drill or exercise, or the disposition of selected comments, as requested by the Manager, EPD, as needed (e.g., Use of the 0800 morning meeting, Millstone To The Point articles, e-mail, SERO Bulletin Board messages, etc.).

- End of Section 2.7 -

2.8 Maintenance Of Records

2.8.1 Maintain all drill and exercise materials in accordance with EPD instructions on document maintenance and storage.

- End of Section 2.8 -

2.9 Post-Drill 24/7 Criteria

Drill Controllers

2.9.1 Through briefings and debriefings, encourage "player" restoration of facilities.

2.9.2 Notify the Drill and Exercise Manager of deficiencies noted in Attachment 2.

Manager, EPD

2.9.3 If a particular deficiency is noted that does not fall clearly under the actions of this section, determine urgency of correcting that item.

Drill and Exercise Manager

2.9.4 Wherever practical, provide separate quantities of applicable documentation and designate as "Drill Use Only."

Drill Controllers

2.9.5 Deliver and return materials to Drill and Exercise Manager.

Drill and Exercise Manager

2.9.6 Seal or distinguish documentation designated as "Emergency Use Only" to preclude non-emergency use.

- End of Section 2.9 -

3. SUMMARY OF CHANGES

3.1 Revision 000

3.1.1 Original issue - material found in this document was previously contained in EPDI-07.

Attachment 1
Definitions

(Sheet 1 of 2)

Definitions

1. Action Item Database (AITTS): The system used to track open action items, assign persons to take corrective actions, and monitor progress until the close-out of the item is complete.

2. Combined Functional Drill (CFD): Any drill which is similar in scope and complexity to an exercise.

3. Connecticut Department of Environmental Protection (DEP): The lead State of Connecticut agency responsible for coordinating and directing responses to radiological activities.

4. Connecticut Office of Emergency Management (OEM): The lead State of Connecticut agency responsible for coordinating and directing responses to disasters and emergencies.

5. Controller: Person responsible for facilitating the progress of a drill or exercise, observing player performance, and assessing whether objectives have been demonstrated.

6. Critique: A session for players, controllers, evaluators and observers conducted by the Facility Lead Controller after a drill or exercise to review strengths, weaknesses, areas for improvement, and summarize the results of the event.

7. Drill: A supervised instruction period conducted to improve the emergency responders' performance and proficiency.

8. Evaluator: Individual assigned to a drill or exercise whose function is to assess the performance of players. Controllers often perform the evaluator functions.

9. Exercise: An evaluated event that tests the integrated capability of emergency response organizations, plans, and procedures with no coaching or input from Controllers.

10. Facility Lead Controller: A person responsible for a group of controllers at a specific facility or location.

11. Mini-scenario: A scenario developed for a group of players or a specific functional area contained within the overall drill or exercise scenario to provide added player activities or details related to the overall scenario.

12. Observer: A person assigned to a drill or exercise whose function is to witness drill action.

13. Participant: An individual officially involved with a drill or exercise as a player, controller or evaluator.

14. Player: An emergency responder who performs assigned functions during a drill and exercise.

Attachment 1
Definitions

(Sheet 2 of 2)

15. Rhode Island Emergency Management Agency (RIEMA): The lead State of Rhode Island agency responsible for coordinating and directing responses to disasters and emergencies.

16. Scenario Package: The primary implementing document for a drill or exercise which contains controller-related instructions, a description of the accident scenario, and required data and information.

17. Table Top: A small scale drill conducted with a select group of emergency responders to discuss and/or demonstrate a specific set of objectives.

18. Visitor: An individual authorized to attend a drill or exercise without player, controller or evaluator responsibilities.

19. Walk-through: Supervised instruction where individuals gain hands-on experience and knowledge in the use of emergency procedures, equipment and facilities through on-the-spot correction of performance.

Attachment 2
Responsibilities

(Sheet 1 of 3)

1. Manager, Emergency Preparedness/Supervisor, Onsite

   A. Provides overall direction for the Emergency Preparedness Drill and Exercise Program.

   B. Coordinates development of and approves drill and exercise schedules.

   C. Coordinates major drill or exercise schedule changes and requests exemption with the appropriate federal agencies.

   D. Appoints a Drill/Exercise Manager or assumes this role dependent upon the event.

   E. Reviews and approves on-site drill and exercise objectives and extent of play.

   F. Develops strategies to ensure that both on-site and off-site emergency response organizations participate in scheduled drills and exercises.

   G. Reviews and approves on-site drill and exercise scenario packages.

   H. Directs the preparation and dissemination of on-site drill and exercise reports.

   I. Manages on-site drill and exercise comment resolution.

   J. Acts as Company Liaison in dealing with off-site drill and exercise comment resolution.

   K. Coordinates actions required to deal with the effects of an unplanned outage or other event which requires the cancellation or reschedule of a major drill or exercise.

   L. Reports scenario compromises to the NRC and/or FEMA as appropriate. Coordinates follow-up and corrective actions with Federal agencies in the event that an exercise scenario has been compromised.

Attachment 2
Responsibilities

(Sheet 2 of 3)

2. Drill/Exercise Manager and EP Department Staff

   A. Prepares drill and exercise scenarios.

   B. Directs preparation for, and implementation of, the drill or exercise.

   C. Establishes the drill/exercise project team.

   D. Interfaces with State, Federal, and local agencies to coordinate drill activities and resolve scenario comments.

   E. Schedules and notifies on-site players and controllers for drill and exercise participation.

   E. Prepares the on-site controller organization for drill/exercise evaluation roles.

   F. Assists the State(s) in the recruitment of an off-site controller organization.

   G. Coordinates the submittal of the approved scenario to FEMA and NRC, as required.

   H. Directs the development of controller materials; coordinates reproduction; ensures proper dissemination; and conducts controller training.

   J. Implements drills and exercises.

   K. Evaluates drill and exercise performances, and prepares objective evaluation reports for management review.

   L. Coordinates disposition of drill and exercise comments.

   M. Coordinates player feedback, as directed.

Attachment 2
Responsibilities

(Sheet 3 of 3)

3. Drill Controllers

The primary responsibility for ensuring that each emergency facility is 24/7 lies with the emergency responders located in that facility. While it is not intended that they provide replacement materials, it is expected that they will:

- Return their specific work area to its pre-drill/event conditions (general housekeeping).
- Identify missing or out-of-stock plans, procedures and other documents utilized in that position.
- Identify shortages of administrative supplies and consumables utilized in that position.
- Identify inoperative or improperly operating equipment utilized in that position.
- Restore clocks, computers, etc., which were set to support a drill scenario to real time upon completion of the drill by the players or controllers in the applicable facility.

Attachment 3
Recommended Schedule Guidelines for Training Drill Scenario Development

(Sheet 1 of 1)

The following timeframes should be used as milestones for training drill scenario development scheduling. The timeframes are critical for development of scenarios allowing sufficient time for validation, review and approval.

- 70 Days - Kickoff/Start Development
- 60 Days - Objectives and extent of play approved (including State if participating); Simulator sessions scheduled
- 45 days - Initial Simulator Run complete; initial draft of Sections 1-5 complete
- 30 days - Initial draft of sections 6-7 complete
- 15 days - Final Simulator validation run complete; confirm all simulator information
- 13 days - Draft scenario complete (all sections); submit scenario to appropriate personnel for review and approval
- 7 days - All comments incorporated and scenario approved; provide to reproduction for copying

Attachment 4
Recommended Schedule Guidelines for Exercise Scenario Development

(Sheet 1 of 1)

The following timeframes should be used for exercise scenario development scheduling. The timeframes are critical for development of evaluated exercise scenarios allowing sufficient time for validation, review and approval to meet federal submittal requirements. Although not recommended, there is some latitude to shorten the suggested timeframes based on ongoing activities for an off-year exercise due to the a lack of formal regulatory submittal requirements.

- 180 Days - Kickoff/Start Development
- 150 Days - Objectives, extent of play, drill/exercise needs finalized
- 120 days - Simulator Runs complete
- 100 days - Draft Scenario complete
- 90 days - For evaluated exercise submit objectives/extent of play; Provide Draft scenario to State for review
- 75 Days - State review complete and comments received
- 62 days - All comments incorporated and scenario approved
- 60 Days - For evaluated exercise scenario submitted to FEMA/NRC

Attachment 5
Reoccurring Drill and Exercise Requirements
(Sheet 1 of 2)

No.	Drill Title	Requirements	Freq[1]	References
D-1	EPZ Communications Drill	Conduct a communications drill with the state and local Warning Points within the plume EPZ. This drill shall include transmittal of information on the ENRS[2].	M	NUREG-0654, N.2.a
D-2	IPZ Communications Drill	Conduct a communications drill with Federal and State emergency response organizations within the ingestion pathway EPZ[2].	Q	NUREG-0654, N.2.a
D-3	Annual Communications Drill	Conduct a communications drill between the EOF, the state and local EOCs, and the Environmental Monitoring Teams. Communications between the CR, TSC and EOF shall also be tested[2].	A	NUREG-0654, N.2.a
D-4	HP Drill	Conduct a Health Physics drill, using simulated elevated airborne and liquid samples, to include response, monitoring, sampling and analysis activities.	S	NUREG-0654, N.2.e.(1)
D-5	Environmental Drill	Conduct an environmental radiological monitoring drill involving on-site and off-site activities. These drills shall include collection and analysis of sample media and provisions for communicants and record keeping.	A	NUREG-0654, N.2.d
D-6	Medical Drill	Conduct a medical emergency drill involving a simulated contaminated individual which contains provisions for participation by local support services agencies.	A[3]	NUREG-0654, N.2.c
D-7	Full Scale Drill	Conduct at least one drill involving a combination of some of the principle functional areas of the on-site emergency response capabilities annually[4].	A	10CFR50, App. E IV.F.2.b
N/A	N/A	Scenarios should be varied such that all major elements are tested within a six-year period (refer to Attachment 5).	C	NUREG-0654, N.1.b

[1] **M** = monthly, **Q** = quarterly, **S** = semi-annual, **A** = annual, **B** = biennial, **C** = once a cycle (every 6 years).
[2] This drill shall also include the aspect of understanding the content of messages.
[3] The off-site portions of the medical drill may be conducted once per calendar year.
[4] Performance of a biennial NRC evaluated exercise satisfies the given year's annual requirement.

Note: Fire Drills shall be conducted in accordance with the Fire Protection Program per the FSAR

Attachment 5
Reoccurring Drill and Exercise Requirements
(Sheet 2 of 2)

No.	Exercise Title	Requirements	Freq[1]	References
E-1	Biennial Exercise	Conduct an exercise that tests the integrated capability and a major portion of the basic elements of the Emergency Plan. The exercise shall simulate an emergency that results in an off-site radiological release which will require response by off-site response organizations. This exercise will involve at least partial participation by off-site authorities.	B	§50.47(b)(3)and(14) §50 App E IV.F.2, F.2.b NUREG-0654, C.2.a, G.4.b, N.1.a and b
E-2	Full Scale	Conduct an exercise involving full participation of the State of Connecticut	C	10CFR50, App. E, IV, F.2.c
E-3	Off-Hours	Commence an exercise between 1800-0400.	C	NUREG-0654, N.1.b
E-4	Different Seasons	Conduct exercises in various weather conditions (during different seasons).	C	NUREG-0654, N.1.b
E-5	Unannounced	Conduct an unannounced exercise (knowledge of the exact date is restricted to only non-participants with a need to know).	C	NUREG-0654, N.1.b
E-6	Ingestion Pathway	Conduct an Ingestion Pathway exercise.	C	§50, App. E Sect. IV, F.2.d FEMA GM IN-1 EPA-400-R-92-001, Ch 3

[1] **M** = monthly, **Q** = quarterly, **S** = semi-annual, **A** = annual, **B** = biennial, **C** = once in a cycle (every 6 years).

Attachment 6
Federal Exercise Schedule Requirements

(Sheet 1 of 2)

Time in days	Activity
90	State and licensee jointly develop and submit exercise objectives/evaluation areas to FEMA and NRC Regional Offices.
75	FEMA and NRC Regional Offices complete reviews of objectives/evaluation areas and establish extent of play agreements. A meeting with licensee, State and FEMA may be necessary.
60	State and licensee submit exercise scenario package to FEMA and NRC Regions for review. Exercise ground rules are established.
45	FEMA and NRC Regions contact or meet with State and licensee to discuss scenario review results. Agreed-upon changes or modifications shall be documented and distributed. Evaluators are assigned and confirmed.
30	Exercise logistics are arranged. FEMA and NRC Regions develop specific post-exercise activity schedule for debriefings and meetings with the State.
15	Final scenario adjustments are completed.
14	The exercise evaluator packet are prepared and distributed. The packet should at a minimum provide: a. Portions of the state and local plans applicable to each assignment b. List of all exercise evaluators and their assignments c. A time line of events d. Scenario summary e. Scenario technical data applicable for each assignment f. Past exercise findings, including reports and all outstanding/unmet objectives g. Applicable controller messages and reference materials h. Logistical information i. Log forms/module(s) for taking notes

Attachment 6
Federal Exercise Schedule Requirements

(Sheet 2 of 2)

Time in days	Activity
1	All Federal observers, both NRC and FEMA, meet in the exercise area to finalize assignments and receive site specific evaluator training.
Exercise Day (ED)	The exercise is conducted. Evaluators hold exit interviews with participants at assigned locations. NRC holds exit interviews on-site.
ED+1	Evaluator debriefing meeting is conducted by the Regional Assistance Committee (RAC) Chairperson. Evaluators complete log forms/module(s) for review and approval by team leaders and FEMA.
ED+2	RAC Chair initiates consultation process for deficiencies. Exercise Evaluation Methodologies (EEM) Evaluation Forms and Narrative Summaries completed and submitted to RAC Chairperson. RAC Chairperson conducts a participants' meeting. RAC Chairperson and the State(s) hold a public meeting.
ED+10	Official notification of identified deficiencies through letter from FEMA Regional Director (RD) to State, NRC HQ and RAC, with information copy to licensee.
ED+20	State acknowledges receipt of deficiency letter and proposes schedule of remedial actions, if required.
ED+30	Draft FEMA summary exercise report is sent to FEMA HQ for review.
ED+50	Summary exercise report provided by FEMA RD to States, NRC HQ, and RAC, with information copy to licensee.
ED+120	Draft exercise report provided by FEMA Region to State and RAC for review and comment.
ED+190	Final exercise report issued.

Attachment 7
Scenario Package Outline Format

(Sheet 1 of 1)

1.0 Objectives and Extent of Play

Objectives are determined using the six year objective plan. This plan is maintained under a separate file and is updated at least annually. Evaluation areas and extent of play need to be developed concurrently with the State for drills involving their participation. This section contains information which will be used to establish any play limitations and simulations (e.g., control cells, simulated displays, etc.).

2.0 Controller Instructions

This information is adapted to meet the needs of a specific drill or exercise. Also included in this section are controller assignments and controller telephone lists. This section describes the Control Cell and out of sequence mini-scenario controller actions. Rules for visitors are also included in this section.

3.0 Sequence of Events

This section contains the details of the scenario sequence. Included in this section is a discussion of the initial conditions, simulator malfunctions to be inserted, cross reference to messages and mini-scenarios, and the expected times for each scenario event occurrence.

4.0 Organizational Response Timelines

This section contains a summary of the key scenario events and the expected time of occurrence.

5.0 Messages

This section contains command and contingency messages necessary to ensure that the correct information is provided to the players or to ensure that the scenario timeline remains valid if players fail to perform a required action during a specific time period.

6.0 Mini-Scenarios

Mini-scenarios are organized by response organizations and will reference any messages in Section 5.0 which support their implementation. Mini-scenarios can be recognized in the normal scenario sequence or can be run out of sequence.

7.0 Plant Parameters

This section includes relevant operational and meteorological data.

8.0 Radiological Data

This section contains radiological and radiochemistry data.

Attachment 8
Typical Drill/Exercise Tasks

(Sheet 1 of 6)

ACTIVITY	ASSIGNED TO	DUE DATE	COMPLETE
Drill Manager Assigned			

Develop Project Schedule

Develop project schedule			
Develop project organization/responsibilities.			
Ensure drill/exercise date is reflected on applicable station schedules			
Project Schedule Approved			

Acquire Development Team

Obtain Resources from Lead Managers / Master Process Owners			
Determine NRC play requirements			
Develop specific work plan for key agencies			
Development Team Acquired			

Develop Team Assignments

Customize team tasking assignments			
Develop Generic Sections 1 & 2 - ERO			
Brief Affected in-house groups on Drill Dates			
Reserve STATE EOC/JMC			
Reserve Simulator			
Schedule Briefing Rooms - SERO			
Develop plan detailing state role/responsibilities			
Conduct Kick-off Meeting			

Develop Objectives and Extent of Play

Review Last On-site Exercise Inspection/Drill Reports			
Review On-site 6 year plan			
Develop Draft On-site Objectives/Extent Of Play			
Develop Draft Off-site Objectives/Extent Of Play			

Attachment 8
Typical Drill/Exercise Tasks

(Sheet 2 of 6)

ACTIVITY	ASSIGNED TO	DUE DATE	COMPLETE
Distribute proposals			
Reconcile Comments			
Issue Final Draft			
Scope and Objectives Approved			

Develop Scenario Time Line

Meet With Operations and Nuclear Training Department developers			
Test Simulator Feasibility			
Meet again and revise as necessary			
Reconcile comments			
Scenario Time Line Approved (Station/State)			

Identify / Inform Participants

Issue "To The Point" describing upcoming need for players/controllers			
Issue Off-site Player/Controller Request Memo			
Notify Off-site Resource/Facility Providers (including CT School of Broadcasting)			
Notify Players - Onsite			
Notify Players - Off-site			
Notify Controllers - Onsite			
Notify Controllers - Off-site			
Reconcile Changes			
Notify Changed out personnel			
Participants Acquired / Notified			

Develop Scenario Package

Develop & implement scenario controls			
Develop Controller Manual - 3.1			

Attachment 8
Typical Drill/Exercise Tasks

(Sheet 3 of 6)

ACTIVITY	ASSIGNED TO	DUE DATE	COMPLETE
Develop Maintenance Mini-Scenarios			
Develop Meteorological Data			
Develop Chemistry / PASS Data			
Develop Source Term Data			
Develop Off-site Radiological Data			
Develop On-site Radiological Data			
Develop Drill Messages			
Develop Mini-Scenarios			
Establish scenario review committee			
Issue Package for review			
Reconcile Comments			
Scenario Package Approved			

Prepare Participants

Issue Player Instructions			
Reproduce/Assemble Packages			
Reproduce/Assemble Player/Controller Materials			
Plan / Conduct On-site Briefing & Training			
Issue "To The Point" notice			
Brief NRC Resident			
Controllers Trained / Briefed			
Conduct pre-drill briefing w/Simulator Operations Crew to cover extent of play & communications expectations			

Drill Readiness

Coordinate Media Notification w/Corp Comm			
Switch over OFIS feed to applicable simulator			

Attachment 8
Typical Drill/Exercise Tasks

(Sheet 4 of 6)

ACTIVITY	ASSIGNED TO	DUE DATE	COMPLETE
Install simulator phone templates			
Switch over simulator phone switches			
Clean out OFIS buffer			
Pre-position sample/KI props			
Visitor list to Security			
Conduct Onsite Controllers Briefs			
Coordinate NRC Entrance Brief			
Schedule MP Security/Police Officer for Access Road			
Develop Player/Controller Phone Lists			
Ensure monitoring vehicles ready			
Conduct Off-site Controller Brief (including CT School of Broadcasting)			
Conduct Off-site Player Brief			
Good Neighbor Notifications			
FEMA Evaluator Briefing - CT			
FEMA Evaluator Briefing - RI			
Arrange NRC Training/workspace			
Catering Arrangements			
Perform ENRS Switchover			
Ensure Drill Readiness			

Post Event Facility Deactivation

Remove simulator phone templates			
Switch over simulator phone switches			
Ensure all catering supplies are removed from facilities			
Ensure monitoring vehicles are back in proper parking spots and fuel is at least ¾ full			
Ensure all facility lockers are locked			

Attachment 8
Typical Drill/Exercise Tasks

(Sheet 5 of 6)

ACTIVITY	ASSIGNED TO	DUE DATE	COMPLETE
Collect all logs and player documentation			
Remove phone and computer carts from simulator			
Restore facility procedures to 24/7 condition			
Contact Information Technology group to clean out manually entered OFIS screens			
Perform quarterly facility surveillance's in accordance with EPSD Facility Manual			

Prepare / Conduct Critiques

Develop critique presentation			
Debrief Players / Evaluators			
Compile Facility Comments			
Arrange for refreshments			
Present Critique To Management			
Reproduce Exercise Material for NRC/FEMA			
FEMA Public Meeting			
Conduct Critique			

Issue Drill/Exercise Report

Draft report based on Critique findings			
Obtain EPSD Management Approval of Final Report			
Issue Drill/Exercise Report			

Issue Drill Comments

Compile All Drill Comments from Leads			
Issue to EPSD Management			
Hold Meeting to Disposition			
Modify comments			
Initiate CRs			
Develop a list of Lessons Learned and make available to SERO members			

Attachment 8
Typical Drill/Exercise Tasks

(Sheet 6 of 6)

ACTIVITY	ASSIGNED TO	DUE DATE	COMPLETE
Acknowledge Participants			
Compile "As Run Participants List"			
Print Certificates			
Develop Memos / Letters			
Distribute Memos & Certificates			
Participants Acknowledged			
File Documentation			
Update Drill Participant Data Base			
Update Six Year Objective Cycle Matrix			
Send Scenario Package Records / Filing			
Send Attendance, Critique Memo and findings to Records / Filing			
Drill Documentation Filed			

Attachment 9
Drill/Exercise Controller Log

(Sheet 1 of 1)

Drill/Exercise: _____ Drill/Exercise Date: _____

Controller's Name (print): _____

Controller's Location/Assignment: _____

Observations should include the proper and effective use of procedures, equipment and personnel. Comments concerning drill performance should document: the time of observation, personnel or equipment involved, procedures involved, and the impact that the condition had on the ability of the player organization to meet its objectives.

TIME	OBSERVATION

Page _____ of _____

Attachment 10
Drill/Exercise Attendance Roster

(Sheet 1 of 1)

Drill/Exercise: _____ Drill/Exercise Date: _____

ERF/Location: _____

NAME (Please Print)	PLAYER/ CONTROLLER	ASSIGNMENT	SIGNATURE

Page _____ of _____

Attachment 11
Player/Controller Comment Form

(Sheet 1 of 1)

Instructions: Record all findings below. Recommended or completed corrective actions are to be indicated in the "Resolution" column.

Drill Title: _____ Date: _____

Name: _____ Phone: _____

ERF Lead Controller: _____

Objective #	Issue Description	Resolution

☐ EOC/Armory ☐ CR/Simulator ☐ EOF ☐ TSC/OSC ☐ NAP/SAP ☐ OSC-AA

Attachment 12
ENRS Drill Checklist

(Sheet 1 of 1)

Pre-Drill:

1) Test ENRS terminal & printer in proper simulator or Control Room 24 - 48 hours prior to drill.

2) Need to decide the targeted participants based on the scope of the drill:

   A. SERO only

   B. SERO & State & Towns

   C. State & Towns

3) Need to complete IRF form ahead of time (including IRF#) and pick proper scenario. Most of the scenarios have a fax list attached to the scenario that will need to be reviewed.

4) Ensure the word DRILL appears a number of times within the IRF.

5) Any changes to the standard scenario's should be checked a day or two before the drill.

During Conduct of Drill:

1) The Shift Tech assigned to the drill/exercise shall always contact the on duty Shift Tech to advise when logging on & off of ENRS and leave a phone number where the drill Shift Tech can be reached.

Post-Drill:

1) The Shift Technician should clear any drill IRFs on the ENRS terminal.

2) Shift Technician is to log-off ENRS terminal.

3) The Shift Tech assigned to the drill/exercise shall always contact the on duty Shift Tech to advise when logging on and off of ENRS and leave a phone number where the drill Shift Tech can be reached.

4) If drill is not a planned scheduled activity (i.e., unannounced drill), the Unit 3 Shift Manager must approve conduct of the drill and use of ENRS.