

MC 0609 Appendix B, Emergency Preparedness, Section 5.3 draft 10/31/2002

5.3 FAILURE TO CORRECT DRILL AND EXERCISE WEAKNESSES

Determination of a failure to correct a drill/exercise WEAKNESS requires a detailed review of the WEAKNESS and the corrective actions. It is not intended that a single repeat of a WEAKNESS (e.g., in a drill) automatically be judged as a failure of the corrective action system. Conversely, success in a drill/exercise (e.g., by one well drilled team) should not necessarily be considered as a demonstration of problem resolution. When an apparent failure to resolve a problem is observed, a review of specific corrective actions should be conducted. Similar occurrences in response to actual events, drills, exercises and training evolutions should be reviewed. The status of relevant PIs should be considered. Corrective action, self assessment and inspection records should be reviewed for an INSPECTION CYCLE with emphasis on similar problems. Completion of corrective actions should be verified. Assessment of the effectiveness of the corrective actions should be based on the complete history of the issue. Judgement should be used to decide how far back in time to go to obtain a reasonably complete picture of the current problem. The intent is to see a pattern of recurring performance problems in similar activities in order to identify ineffective corrective actions.

Background

10 CFR 50.47(b)(14) requires that *Periodic exercises are conducted to evaluate major portions of emergency response capabilities, periodic drills are conducted to develop and maintain key skills and deficiencies identified as a result of exercises and drills are (will be) corrected.* Appendix E, section IV, F, g, states *All training, including exercises, shall provide for formal CRITIQUES in order to identify weak or deficient areas that need correction. Any WEAKNESSES or deficiencies that are identified shall be corrected.*

The DEP PI system collects performance data from a broad cross section of drills and the licensee response band allows for ERO members to fail in the process of developing and maintaining key skills associated with DEP PI's. The correction of these drill/exercise WEAKNESSES is within the licensee response band. Thus, if NRC oversight unduly penalizes failures in drill performance, it would detract from the development and maintenance of key skills. This same philosophy must be applied when considering performance associated with areas not covered by the DEP PI.

The DEP PI allows a 10% failure rate threshold for the licensee response band in the most risk significant areas of the EP Cornerstone. If the PI crossed the threshold, the licensee would plan actions to correct the performance WEAKNESS and a white input would be documented. However, no finding against corrective actions would be necessary, even though the failure to correct WEAKNESSES may be part of the root cause for crossing the PI threshold. In performance areas not covered by the DEP PI, there is no PI threshold for which regulatory oversight is increased (i.e., the performance failure rate in non-DEP PI areas is not compiled). Therefore, data from drill CRITIQUES may be used to determine the effectiveness of corrective actions. However, the same philosophy used to permit the DEP PI 10% failure rate threshold for the licensee response band must be considered when evaluating areas not covered by the DEP PI.

If corrective actions are not adequate and the WEAKNESS involves a RSPS area not covered by the DEP PI (e.g., 50.47(b)(9)), a LOSS OF PS FUNCTION should be assessed (i.e., a white finding). All non-RSPS areas would be green.

Criteria

The licensee has failed to correct WEAKNESSES in drill/exercise performance, in areas not covered by the DEP PI.

Failure to correct WEAKNESSES associated with a RSPS should be assessed as a functional failure of PS 50.47(b)(14), (i.e., a white finding). Other failures to correct WEAKNESSES would be no greater than green.

Considerations

If corrective actions are aggressive and appear to be complete, but are not yet fully effective, consideration may be given to allow more time for performance improvement. Future drills would be expected to show performance improvement. Actions taken to enhance or improve performance, and not specifically implemented to correct weaknesses, are not to be evaluated for their effectiveness by the EP SDP.