

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS
WASHINGTON, D.C. 20555

May 11, 1989

NRC INFORMATION NOTICE NO. 89-46: CONFIDENTIALITY OF EXERCISE SCENARIOS

Addressees:

All holders of licenses for fuel cycle facilities and byproduct material licensees having an approved emergency response plan.

Purpose:

This information notice is being provided to alert fuel facility and certain byproduct material licensees of the unacceptable practice of conducting the required annual radiological emergency response exercises using "players" who are familiar with the details of the exercise scenarios. It is expected that recipients will review the information for applicability to their programs, distribute the notice to responsible radiation protection and emergency response staff, and consider actions, if appropriate, to ensure that emergency response exercises fulfill their intended purpose. However, suggestions contained in this information notice do not constitute new U.S. Nuclear Regulatory Commission (NRC) requirements, and no written response is required.

Description of Circumstances:

During NRC's observation and evaluation of a recent radiological emergency exercise at a fuel facility in NRC Region II, the inspectors learned that the licensee was planning to use a scenario that was familiar to the exercise players. The inspectors also learned that a training handout was provided to members of the emergency organization which intentionally included the actual scenario to be used for the exercise. The scenario and the various players' anticipated roles were apparently discussed and "rehearsed." The handout also offered applicable emergency procedures (or portions thereof) for use by players during the exercise. Subsequent inspections at other fuel cycle facilities have revealed that this situation is not unique. Failure to conduct a radiological emergency exercise in a manner that adequately tests a licensee's ability to implement the Radiological Contingency Plan could result in an NRC request to conduct a remedial exercise, as occurred in the case discussed above.

Discussion:

Fuel facility and major byproduct materials licensees were ordered under a Generic Order published in the Federal Register (Vol. 46, No. 31, February 17, 1981) to submit radiological contingency plans to the NRC licensing staff for incorporation into their licenses. The emergency response plans submitted in

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response to this order have been incorporated as license conditions for a number of years. These plans include requirements for periodic training, drills, and exercises. The purpose of training and drills is to familiarize participants with the contents of the contingency plan, procedures, and the types of events that would take place in the facility.

However, for exercises, it was the NRC's intention that participants not have prior knowledge of the specific exercise scenario. Exercises are conducted to test response capabilities and ensure that radiological emergency personnel are familiar with their duties. Observers of exercises cannot evaluate the effectiveness of personnel actions if the personnel have been briefed on the scenarios prior to the exercise.

The new final rule, effective April 7, 1990 (Federal Register Vol. 54, No. 66, published April 7, 1989) states, "Exercises must use accident scenarios postulated as most probable for the specific site and the scenarios shall not be known to most exercise participants. The licensee shall critique each exercise using individuals not having direct implementation responsibility for the plan. Critiques of exercises must evaluate the appropriateness of the plan, emergency procedures, facilities, equipment, training of personnel, and overall effectiveness of the response. Deficiencies found by the critiques must be corrected."

~~No specific action or written response is required by this information notice. If you have any questions about this matter, please direct them to the technical contact listed below, or to the Regional Administrator of the appropriate NRC Regional Office.~~



Richard E. Cunningham, Director
Division of Industrial and
Medical Nuclear Safety
Office of Nuclear Material Safety
and Safeguards

Technical Contacts: Edwin D. Flack, NMSS
(301) 492-0405

Douglas M. Collins, Region II
(404) 242-5586

Attachments:

1. List of Recently issued NMSS Information Notices
2. List of All Recently Issued NRC Information Notices

LIST OF RECENTLY ISSUED
NMSS INFORMATION NOTICES

Information Notice No.	Subject	Date of Issuance	Issued to
89-37	Proposed Amendments to 40 CFR Part 61, Air Emission Standards for Radionuclides	04/04/89	All U.S. NRC licensees
89-35	Loss and Theft of Unsecured Licensed Material	03/30/89	All U.S. NRC byproduct, source and special nuclear material licensees
89-34.	Disposal of Americium Well-Logging Sources	03/30/89	All holders of U.S. NRC specific licenses authorizing well-logging activities.
89-25	Unauthorized Transfer of Ownership or Control of Licensed Activities	03/07/89	All NRC source, byproduct, and special nuclear material licensees.
89-24	Nuclear Criticality Safety	03/06/89	All fuel cycle licensees and other licensees possessing more than critical mass quantities of special nuclear material.
89-13	Alternative Waste Management Procedures in Case of Denial of Access to Low-Level Waste Disposal Sites	02/08/89	All holders of NRC specific licenses.
89-12	Dose Calibrator Quality Control	02/09/89	All NRC medical licensees.
89-03	Potential Electrical Equipment Problems	01/11/89	All fuel cycle and major nuclear materials licensees.

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NRC INFORMATION NOTICES

Information Notice No.	Subject	Date of Issuance	Issued to
89-45	Metalclad, Low-Voltage Power Circuit Breakers Refurbished with Sub-standard Parts	5/8/89	All holders of OLS or CPs for nuclear power reactors.
89-44	Hydrogen Storage on the Roof of the Control Room	4/27/89	All holders of OLS or CPs for nuclear power reactors.
88-82, Supp. 1	Torus Shells with Corrosion and Degraded Coatings in BWR Containments	5/2/89	All holders of OLS or CPs for BWRs.
89-43	Permanent Deformation of Torque Switch Helical Springs in Limitorque SNA-Type Motor Operators	5/1/89	All holders of OLS or CPs for nuclear power reactors.
88-97, Supp. 1	Potentially Substandard Valve Replacement Parts	4/28/89	All holders of OLS or CPs for nuclear power reactors.
89-42	Failure of Rosemount Models 1153 and 1154 Transmitters	4/21/89	All holders of OLS or CPs for nuclear power reactors.
89-41	Operator Response to Pressurization of Low-Pressure Interfacing Systems	4/20/89	All holders of OLS or CPs for nuclear power reactors.
88-75, Supplement 1	Disabling of Diesel Generator Output Circuit Breakers by Anti-Pump Circuitry	4/17/89	All holders of OLS or CPs for nuclear power reactors.
89-40	Unsatisfactory Operator Test Results and Their Effect on the Requalification Program	4/14/89	All holders of OLS or CPs for nuclear power reactors.
89-39	List of Parties Excluded from Federal Procurement or Non-Procurement Programs	4/5/89	All holders of OLS or CPs for nuclear power reactors.

OL = Operating License
CP = Construction Permit

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Conduct of drills and exercises are to ensure that radiological emergency personnel are familiar with their duties. Observers of drills and exercises cannot evaluate the effectiveness of personnel actions if the personnel have been exposed to the scenarios during training.

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