

Comments on the new DRAFT Executive Team Procedure

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The new procedure is fundamentally sound, well written, clear, and in a much better format.

- Some continuous action steps are listed in specific mode sections. These steps should be brought up at the beginning of the procedure and as necessary re-listed later in the procedure. For example:
 - Step 3.3.3 has a step to discuss with the HSOC senior watch officer whether preparations need to be made to designate NRC personnel to the HSOC. The ET needs to consider interface activities with other federal agencies at all times.
 - Step 3.3.3 has a step to contact the HSOC to discuss the possible declaration of an Incident of National Significance. This too should be a continuous action step. As additional information is gained our thoughts in this area could change.
- Consideration of whether an event should be considered an Incident of National Significance is brought out several times in the draft procedure. The items given do not match each other and do not match what is in the NRC's Incident Response Plan. In addition at least one example given is below the threshold given in the IRP (i.e. licensee declaration of a Site Area Emergency for a non-terrorist related event is not in accordance with NUREG-0728, Revision 4, section 5.D.3.b).
- Figure 1, "Response Mode Decision Flowchart," states, "NRC response mode decision must be made within 30 minutes of event notification." This time limit is not discussed in the procedure steps. The time limit should either be discussed in the procedure steps or removed from the flowchart.
- There are several examples where references have changed without being updated. For example, section 4.0, "Definitions," references section 3.3.2 for a definition of a potential Incident of National Significance," the reference should be 3.3.3 or 3.4.2. Also Appendix 1 has two references which are out of date and Appendix 6 makes a reference to Appendix 7 as Appendix 6.
- Section 5.0, "References," gives the National Response Plan, January 2005 as a reference. The latest version on the DHS Website is dated December 2005. January 2005 is the date when we began implementing the NRP.
- Appendix 4, "Expanded Activation Mode Checklist for ET Member (no site team deployed)," states the "ET Member Actions for Expanded Activation are identical to those for Activation." Under ongoing actions this appendix contains an extra step to have the team member "Review the distribution list for terrorist-related information" that is not in Appendix 2.
- Some appendices in action steps either do not have titles or have titles which do not match the title of the appendix. Examples include step 3.4.2 and step 3.5.3, and

Appendix 6.

- Step 3.5.3 lists items for which a Site Team Leader may be delegated. The wording in the step does not match the wording in Appendix 7, "Confirmation of Site Team Director Appointment."
- Page 9 has a step which directs the ET Director/Deputy Director to use a checklist and the appropriate appendix number is not given.