

Region IV Comments on IP 71114.07 (9-30-05)

IP 71114.07 "Emergency Preparedness (EP) Portion of Force-On-Force (FOF) Exercises"

1. Section 3.01, Fourth bullet. Text allows both the use of simulated plant staff and knowledgeable persons (e.g. EP Planners) acting as site-specific required Control Room staffing. Consider adding third paragraph such as,

"When necessary plant personnel or activities required by the licensee's emergency plan are simulated, controllers should be provided a sufficiently detailed scenario and cues to realistically simulate those personnel or activities, including any challenges or failures which are part of the planned scenario."

This comment was incorporated.

2. Section 3.01.a Offsite Notifications. Delete words in third sentence "...would reflect whether the PI opportunity is taken, but...". Whether the PI credit is adequately assigned does depend on the level of simulation, but licensees have the option to designate the degree of simulation based on an earlier paragraph in Section 3.01 (Comment #3 below).

This comment was incorporated.

3. Section 3.01, Seventh bullet. First sentence should read (see Comment #2 above): "The determination of whether the risk-significant activities of classification, notification and PAR development will be counted toward the DEP PI is reflected by the level of simulation and is left to the licensee's discretion."

This comment was incorporated.

4. Section 3.01.b E-Plan Implementation. Consider adding a note or sentence before the paragraph "Initial and Subsequent E-Plan Classifications" similar to:

"The prepared scenario should clearly identify the expected emergency action level(s) and classification(s), onsite protective actions, and offsite protective action recommendations. Any deviations from the expected scenario should be addressed in the critique process."

Most of this comment was incorporated. The second sentence was changed to read that deviations from the prepared scenario should be reviewed by the inspector for accuracy, instead of "should be addressed in the critique process." Deviations from the scenario may be credible and not always addressed in the critique.

5. Section 3.01.c Operational Response, Control Room Response. Delete words in fourth sentence "...since these actions would be taken with the help of the ERO". Whether or not the ERO would be available depends on scenario timing (e.g. day shift or back shift). Consider adding a sentence at the end of the paragraph similar to:

"The SM should take actions and develop priorities consistent with the ERO capabilities postulated in the scenario (day shift or back shift)."

This comment was incorporated.

6. The writing style in 3.01.c and 3.01.d. is not the same as in 3.01.a and could be better harmonized. Section 3.01.c does not clearly define the "as a minimum" level of demonstration. It is not clear whether Medical Response, Fire Emergency, and Control Room Evacuation are required as FOF scenario elements or whether they are optional. Since the overall FOF involves several scenarios, a minimum frequency for each element might be useful.

As specified, tasks in bold must be demonstrated, but all others will be demonstrated only if applicable to the scenario. There are no requirements to demonstrate these on any periodicity.

7. Section 3.02. In the third sentence, replace the word "improve" with "were problems with." The NRC does not inspect to improve licensee performance.

This comment was incorporated.