

Region II Comments on IP 71114.07 (9-28-05)

- As this event requires integration of efforts from diverse licensee groups, the resident inspectors are probably the best choice for evaluating the response due to their general knowledge of all areas and organizations within the plant.

Comment only. No action necessary.

- There may be multiple locations where significant activities are taking place simultaneously. The scope of IR 03.01.b seems to be on par with 71111.01 for observation of the Emergency Exercise. This generally takes a team of at least three inspectors. Therefore, more than one resident will probably need to be involved to complete all of the tasks in 03.01. This may make the resource estimate of 6-10 hours a little low. If we really want to take a hard look at this perhaps we could consider doing this in lieu of IP 71111.01 for the first time and have a full EP team which would contain EP specialist who would bring a much more in depth knowledge of current EP issues.

Not necessary. The evaluation is one table-top exercise observed in a Control Room cell by one resident inspector. No additional resources are necessary.

- A strong understanding of NRC Bulletin 2005-02 is needed to effectively complete this IP. One may want to consider some on-line training for this.

This will be considered, based on EPD resources available. But the Bulletin is probably straight forward enough that the residents can read it on their own.

- The sixth bullet under 03.01 says that "Results of the EP portion of the exercise will be reported publicly..." Does this entail anything more than documentation in the residents' quarterly inspection report?

This bullet was revised to read that the inspection results will be incorporated into the DNS report and will not be publicly available.

-A pilot with both an EP specialist and the resident might be good. Afterwards assess what scenarios, or plant configurations (like TSC/EOF locations), would require more than just the resident, then include in the inspection procedure that when these type activities are expected the additional skill set should be included on the inspection. I also had a question related to off-site fire fighting coordination. It is difficult to see whether that is effective without someone there to watch it.

Again, not necessary. The observation is one table-top exercise by one resident inspector. No other activities, such as fire drills, are observed.

Specific procedure comments from Joe Brady, McGuire Senior Resident Inspector:

02.01 & 02.02 - should not be an inspection requirement as written. These are prep activities that should be charged to BIP, not direct inspection. I would suggest the wording be changed to something like the following if we want these part of direct inspection:

02.01 Discuss the FOF drill scenario with the licensee EP personnel to determine what aspects of the exercise will be actual performance, walk-through, or discussion activities. Determine whether controllers assigned to each area have the prerequisite qualification for the areas they will be involved with. Determine whether the licensee's staffing of players for the drill will be adequate to demonstrate the operations-security interface and emergency response activities from the simulated control room.

This comment was incorporated.

02.02 Review a sample of EP corrective actions identified during previous FOF exercises that will be demonstrated during the current FOF to determine whether corrective actions have been completed and adequately address the causes.

This comment was incorporated.

02.03 add the following: During the exercise, observe whether corrective actions reviewed under 02.02 were effective in correcting the identified problems.

This comment was incorporated.

Consider putting the preparation guidance in Section 03 under an Inspection Preparation heading prior to 03.01. Much of the 03.01 guidance could go there in the big picture view. Make Inspection Guidance discussion in sections 03.01 and 03.02 specific to inspection tasks 02.01 and 02.02.

This comment was incorporated. Section 02.01 was eliminated, since it concerned inspection preparation instead of direct inspection. All of Section 03.01 was put under the new heading "Inspection Preparation." Other sections were re-numbered accordingly.

I think the procedure can probably be done by one person since it looks like most of the EP activity will be done in the control room without the TSC being manned (45 minutes to an hour). If the EOF (remote location) gets manned promptly, the classification activities would probably quickly end up being done there, with no TSC being manned (due to inability to get people to the TSC). In that case an additional person at the EOF to look at EP classification and PARs would be of benefit. If EP classification and PARs can be looked at after the fact based on notification sheets (procedure hints at this), then one person can still do the procedure.

All activities are observed in the Control Room in a table-top setting by one resident inspector.

Also, the time will depend on the length of the security aspect of the drill. If a lengthy fire fight is involved and vital areas compromised, it will probably take closer to 12 -14 with my rewrite. If it is at a site that has a great geographic setup and good strategies, it could be over in a short period of time and the 6-10 might be ok. In addition, if 02.01 and 02.02 are not intended to be Direct Inspection, only Prep (then rewriting is needed to put them in a new 03 Inspection Preparation section), the procedure could probably be done in 6-10.

This comment was incorporated. See above.