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## INSPECTION PROCEDURE 71114

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### REACTOR SAFETY—EMERGENCY PREPAREDNESS

PROGRAM APPLICABILITY: 2515

#### 71114-01 INSPECTION OBJECTIVES

01.01 The objective of this procedure is to gather information to determine, in conjunction with the performance indicators, whether a licensee is meeting the Cornerstone Objective and Performance Expectation.

01.02 The Cornerstone Objective is “To ensure that the licensee is capable of implementing adequate measures to protect the public health and safety in the event of a radiological emergency.”

01.03 The Cornerstone Performance Expectation is “Demonstration that reasonable assurance exists that the licensee can effectively implement its emergency plan to adequately protect the public health and safety in the event of a radiological emergency.”

#### 71114-02 INSPECTION REQUIREMENTS

02.01 Baseline inspection requirements are identified in each of the attached inspectable areas:

- a. Exercise Evaluation (Attachment 01)
- b. Alert and Notification System Evaluation (Attachment 02)
- c. Emergency Response Organization Staffing and Augmentation System (Attachment 03)
- d. Emergency Action Level and Emergency Plan Changes (Attachment 04)
- e. Correction of Emergency Preparedness Weaknesses (Attachment 05)
- f. Drill Evaluation (Attachment 06)
- g. Force-On-Force (FOF) Exercise Evaluation (Attachment 07)

02.02 The requirements found in the attached inspectable areas represent the minimum inspection activity to be conducted at each reactor site. The expected frequency of inspection is given in each inspectable area.

02.03 The accuracy of licensee reported performance indicator (PI) data will be inspected annually using Inspection Procedure (IP) 71151, “Performance Indicator Verification.”

02.04 The licensee program for problem identification and resolution will be inspected annually using IP 71152, “Identification and Resolution of Problems.”

General Guidance

Performance Indicators

- a. The “Drill/Exercise Performance” PI (DEP PI) monitors licensee performance of event classification, offsite authority notification and protective action recommendation (PAR) development.
- b. The “Emergency Response Organization Drill Participation” PI (ERO PI) monitors licensee efforts to develop and maintain key skills within the ERO through participation in proficiency enhancing evolutions, such as drills.
- c. The “Alert and Notification System Reliability” PI (ANS PI) monitors reliability of the alert and notification system. This system has been identified as the most risk-significant equipment system maintained by nuclear plant emergency preparedness programs.
- d. DEP and ERO PIs are linked in that ERO drill participation is only credited when performance is assessed for contribution to DEP. The details and exceptions to this linkage are contained in Nuclear Energy Institute (NEI) 99-02, “Regulatory Assessment Performance Indicator Guideline.”

Disposition Of Findings

- a. The need for inspection beyond the Baseline Inspection Program (BIP) is determined through the significance and number of inspection findings and the status of PIs.
- b. A Significance Determination Process (SDP) has been developed for assessing the significance of inspection findings. The details of the Emergency Preparedness (EP) SDP are contained in Manual Chapter 0609, Appendix B.
- c. The BIP is designed for programs operating in the “licensee response band,” that is, a program with green PIs and only green findings. The resources allocated in the BIP are not intended to be sufficient for the characterization of potential white, yellow, or red findings. Should it be necessary to characterize such findings, and the time involved exceeds a few hours, the time should be allocated to the SDP rather than the BIP.

Correction of Weaknesses

- a. Findings of a failure to correct a weakness, or observations of program inadequacies should be summarized and provided to the team leader for the annual problem identification and resolution inspection.
- b. Weaknesses appropriately critiqued by the licensee in evaluated exercises are not considered findings. However, the inspector must ensure that such items are entered into the licensee corrective action system in a manner that will allow review during the subsequent off-year exercise and next biennial exercise.
- c. Section IV.F.2.g. of Appendix E to 10 CFR 50, requires that weaknesses identified in the EP program be corrected. Inspectors should review the correction of licensee and NRC-identified weaknesses. However, in the case of personnel performance, a repeat performance problem may not in itself, represent a failure

to correct a weakness. The inspector must review licensee efforts to correct the item and the reasons for the repeat problem. If the problem is localized it would not be appropriate to determine that it represents a failure to correct. Guidance on determining the adequacy of licensee efforts to resolve problems is contained in Manual Chapter 0612, in the EP SDP, and Inspection Procedure 71152.

### Risk-Significant Areas

Implementation of the Emergency Plan (the Plan) is dependant on the performance of the ERO in their EP assignments. There are many areas important to Plan implementation, but the most risk-significant areas of performance are:

- a. Timely and accurate classification of events. This includes the recognition of events as potentially exceeding emergency action levels. [10 CFR 50.47 (b) (4)]
- b. Timely and accurate notification of offsite governmental authorities. This includes adequate performance of notifications to state and local authorities as specified in the Plan. [10 CFR 50.47 (b) (5)]
- c. Timely and accurate development of PARs for offsite authorities. This includes providing PARs to governmental authorities, and the decision-making process to develop the PARs. [10 CFR 50.47 (b) (10)]
- d. Assessment of offsite consequences. This includes the ability to assess and monitor the magnitude and dose consequences of potential or actual radioactive releases. [10 CFR 50.47(b)(9)]

In general, NRC oversight in EP is focused on adherence to the Plan with an emphasis on these most risk-significant areas, and inspection resources should be deployed in a manner to cover these areas.

### Prioritization of Additional Areas for Inspection

Guidance for deployment of inspection resources beyond the most risk-significant areas is provided below. These areas may generally be considered in order of importance. Selection for deployment of inspection resources should be based on knowledge of the program, previous problems and logistics.

- a. Adequacy of worker protection including accountability, evacuation, exposure authorization and thyroid protection [50.47(b)(10)&(11)].
- b. Adequacy of interface with offsite authorities (e.g., in the area of PAR communication and technical support) [50.47(b)(6)].
- c. Timely activation of facilities [50.47(b)(2)].
- d. Ability to prioritize mitigation and assessment efforts to protect the public health and safety.
- e. Command and control [50.47(b)(1)].
- f. Ability to diagnose plant accident conditions.
- g. Ability to formulate mitigating actions.

- h. Ability to implement mitigating actions (e.g., damage control teams) under accident conditions.
- i. Adequacy of communications between licensee facilities [50.47(b)(6)].
- j. Accuracy and completeness of licensee-approved press releases [50.47(b)(7)].
- k. Readiness and quality of EP equipment and facilities [50.47(b)(8)].

### Scheduling

Attachment 1 should be scheduled for evaluation of the biennial exercise. An exercise is to be evaluated biennially at each licensee site, including one biennial exercise for each licensee at a co-located site. The PI verification (IP 71151) is to be performed annually and should be performed in conjunction with Attachment 1. Attachment 2, "Alert and Notification System Evaluation," Attachment 3, "Emergency Response Organization Staffing and Augmentation System," and Attachment 5, "Correction of Emergency Preparedness Weaknesses," may be conducted during a single inspection in the year when there is no biennial exercise. IP 71151 should also be conducted at that time. Attachment 4, "Emergency Action Level and Emergency Plan Changes," may be conducted when changes are received and may be conducted in the regional office. Attachment 6, "Drill Evaluation," is conducted annually by the resident inspector and may be done whenever convenient to the licensee and inspector schedule. Attachment 7, "Force-On-Force (FOF) Exercise Evaluation," should be conducted every three years in conjunction with the FOF exercise, and in place of one Attachment 6 drill evaluation for that year.

### 71114-04 INSPECTION RESOURCES

Estimates of inspection resources are identified within each inspectable area attachment.

### 71114-05 REFERENCES

NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," and revisions.

"Emergency Preparedness Position (EPPOS) on Timeliness of Classification of Emergency Conditions," (EPPOS No. 2.)

Regulatory Guide 1.101, "Emergency Planning and Preparedness For Nuclear Power Reactors," all revisions.

Regulatory Issue Summary (RIS) 2003-18, "Use of NEI 99-01, 'Methodology for Development of Emergency Action Levels'," and Supplements.

RIS 2005-02, "Clarifying the Process for Making Emergency Plan Changes."

Inspection Procedure 71152, "Identification and Resolution of Problems."

Inspection Procedure 71151, "Performance Indicator Verification."

FEMA-REP-10, "Guide For the Evaluation of Alert And Notification Systems For Nuclear Power Plants."

END

Attachments:

- .01 Exercise Evaluation
- .02 Alert and Notification System Evaluation |
- .03 Emergency Response Organization Staffing and Augmentation System |
- .04 Emergency Action Level and Emergency Plan Changes
- .05 Correction of Emergency Preparedness Weaknesses
- .06 Drill Evaluation
- .07 Force-On-Force (FOF) Exercise Evaluation |

ATTACHMENT 1

Revision History For IP 71114

| Commitment Tracking Number | Issue Date | Description of Change  | Training Needed | Training Completion Date | Comment Resolution Accession Number |
|----------------------------|------------|--|-----------------|--------------------------|-------------------------------------|
| N/A                        | 06/29/06   | <p>Completed four-year historical CN search.</p> <p>Revised to reflect changes to the procedure attachments, add new procedure Attachment 07, simplify using acronyms, and add new references.</p> | None            | N/A                      | ML061580314                         |
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