

ATTACHMENT 71114.05

INSPECTABLE AREA: Correction of Emergency Preparedness Weaknesses

CORNERSTONE: Emergency Preparedness

INSPECTION BASES: This Inspection evaluates the efficacy of licensee programs that identify and correct Emergency Preparedness (EP) weaknesses. An EP weakness is defined as “A demonstrated level of performance (e.g., in a drill) that could have precluded effective implementation of the Emergency Plan in the event of an actual emergency.”

The EP Cornerstone is based upon the licensee response band established by the Performance Indicator (PI) program and the licensee’s problem identification and resolution (PI&R) program. The Drill/Exercise Performance (DEP) performance indicator (PI) measures licensee performance in specific risk-significant activities. The Emergency Response Organization (ERO) Drill Participation PI provides an indication of licensee efforts to develop and maintain key skills through the conduct and evaluation of drills, exercises and certain training evolutions. In the course of activities that support both these PIs the licensee is expected to identify weaknesses and correct them.

These two PIs, complemented by effective conduct of EP drills and exercises, effective assessment of performance and the effective correction of weaknesses, allows a licensee response band to be established that includes: training quality and conduct, emergency plan implementing procedure quality, facility and equipment readiness, personnel performance in drills and exercises, organizational and management changes and communications equipment readiness.

PI&R encompasses the drill and exercise critique program, critique of actual events and other assessment activities (e.g., QA audits and reviews performed in accordance with 10 CFR 50.54(t)), as well as the corrective action program.

This inspection evaluates licensee efforts to correct weaknesses and is associated with planning standard 10 CFR 50.47(b)(14).

This inspection verifies aspects of the Emergency Preparedness Cornerstone for which there are no indicators to measure performance.

LEVEL OF EFFORT: Inspection of the correction of EP-related weaknesses. |

71114.05-01 INSPECTION OBJECTIVE

To evaluate the licensee's efforts to correct EP-related weaknesses. |

71114.05-02 INSPECTION REQUIREMENTS

02.01 Review the licensee's PI&R program applicable to the identification and resolution of EP program weaknesses. |

02.02 Review all actual events resulting in Emergency Plan implementation since the last inspection and determine if the licensee effectively implemented the requirements of the Plan. Review the adequacy of the licensee's critique of Emergency Plan implementation activities during the actual event(s). |

02.03 Review the effectiveness and timeliness of all licensee EP-related corrective actions identified as a result of an actual event self-assessment. |

02.04 Review a sample of drill scenarios, supporting documentation and critiques. Determine whether the critique properly identified EP weaknesses. |

02.05 Review a sample of EP corrective actions identified as a result of drill critiques or other self-assessments. Determine if the corrective actions have been timely and effective. |

02.06 Review EP audit(s) performed in accordance with 10 CFR 50.54(t). |

02.07 Review a sample of other EP self-assessment documents, such as QA assessments of EP program elements. |

71114.05-03 INSPECTION GUIDANCE

The primary focus of this inspection is to evaluate the efficacy of a licensee's ability to identify and correct EP weaknesses. |

03.01 Review licensee corrective action program procedures and procedures for critique conduct and correction of EP weaknesses. Responsibility for conduct of critiques may be assigned to multiple departments, (e.g., Quality Assurance for audits, Emergency Preparedness for EP exercises and drills, and Operations Training for simulator evolutions). Include procedures related to actual events, drills, exercises, audits, and EP program reviews. |

03.02 For every actual Emergency Plan implementation since the last inspection, if any, review event-related documentation including: notification forms, logs and checklists. Based on event documentation, independently determine if the licensee effectively implemented the requirements of the Plan. Specifically, consider the timeliness and |

accuracy of classification, notification and PAR development. (Note: events requiring actual Emergency Plan implementation may be inspected under the event follow-up inspection.) Review other aspects of Plan implementation as appropriate to the event. Consider the completeness of records. Review licensee self-assessment of events. Compare the licensee self-assessment against the inspector's independent evaluation of records of the event(s) to determine if the licensee correctly identified EP weaknesses and entered them into the site corrective action program. Consider any evaluation documented by the resident inspector concerning event response.

03.03 Review the effectiveness and timeliness of all licensee EP-related corrective actions identified as a result of an actual event self-assessment. Determine if the licensee's corrective actions were timely and effective, i.e., was the amount of time reasonable based on safety significance (refer to MC 0609, Appendix B for further guidance), and were the corrective actions effective in correcting the problem.

03.04 Select a sample of drills (if available) for review of licensee self-assessments. Review critiques, scenario summaries, EPIP forms and checklists used to support and document classification, notification and PAR development. From review of drill documentation, determine whether the critique properly identified failures to classify the events, notify State and local authorities, or develop and communicate PARs in a timely and accurate manner. Other EP areas may be reviewed in a similar manner. The guidance provided in section 71114-03, "Prioritization of Additional Areas for Inspection," may be used to select other areas for review.

03.05 Review a sample of corrective actions identified as a result of EP drills or other self-assessment activities. The sample should include all corrective actions associated with classification, notification, PAR development and dose assessment activities. Additional corrective actions should be selected from other EP areas in accordance with the guidance provided in section 71114-03, "Prioritization of Additional Areas for Inspection."

For repeat items or trends determine whether corrective actions should have precluded recurrence. Determination of a failure to correct a drill or exercise weakness requires a detailed review of the weakness and the associated corrective actions. It is not intended that a single repetition of a weakness (e.g., in a drill) should automatically be deemed a failure of the corrective action system. Conversely, success in a drill or exercise (e.g., by one well-drilled team) should not necessarily be considered a demonstration of problem resolution. When an apparent failure to resolve a problem is observed, review specific corrective actions, as well as similar occurrences in response to actual events, drills, exercises and training evolutions. Also consider the status of relevant PIs and review corrective action, self-assessment and inspection records with emphasis on similar problems. In addition, verify completion of corrective actions. Assessment of the effectiveness of the corrective actions should be based on the complete history of the issue. Obtain a reasonably complete picture of the current problem by reviewing previous corrective actions. The intent is to determine whether a pattern of recurring performance problems has occurred in similar activities, in order to identify ineffective corrective actions.

The inspector may identify a sample of corrective actions for a detailed review of closure documentation. This may include inspection in the field to verify that terminal conditions

are in accordance with the closure documentation. Equipment and facilities or other areas of EP may be included in this sample as deemed appropriate.

Further, should the corrective action record indicate a lack of effort in a particular area, (e.g., field monitoring team equipment or team member performance), the inspector may sample the area for compliance with Emergency Plan commitments. Lack of attention in an area may be indicated by a lack of critique comments (negative and positive) or lack of corrective actions for items which could normally be expected to require maintenance.

If corrective actions are aggressive and appear to be complete but not yet fully effective, consideration may be given to allow more time for performance improvement (future drills would be expected to show such improvement). Actions taken by the licensee to enhance or improve performance, and not specifically implemented to correct weaknesses, are not to be evaluated for their effectiveness.

03.06 Review EP audit(s) performed in accordance with 10 CFR 50.54(t). Evaluate adequacy of audits to comply with regulatory requirements. Determine whether the timeliness structure of audits are consistent with regulatory requirements and licensee program changes. Review the effectiveness of a sample of corrective actions identified. Prioritization should be given to problems associated with classification, notification, PAR development and assessment activities. A sample of corrective actions from other EP areas may also be reviewed. The guidance provided in section 71114-03, "Prioritization of Additional Areas for Inspection" may be used to select other areas for review.

03.07 Review a sample of other EP self-assessment documents. For example, review QA assessments of drill performance, ERO readiness, EP facility readiness, etc. Review the disposition of a sample of the corrective actions identified. Determine if the licensee's corrective actions were timely and effective (refer to MC 0609, Appendix B, Sections 5.2 and 5.3 for further guidance).

71114.05-04 RESOURCE ESTIMATE

The direct inspection effort is estimated to be, on average, between 9 hours and 15 hours biennially regardless of the number of reactor units at a site.

71114.05-05 PROCEDURE COMPLETION

This procedure is considered complete when all the inspection requirements listed in the procedure have been satisfied. For the purpose of reporting completion in the Reactor Program System (RPS), the sample size is defined as 1. A sample size of 1 will be reported in RPS when the procedure is completed in its entirety.

END

Attachment 1

Revision History For IP 71114.05

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	10/25/06	Completed four-year historical CN search.	N/A	N/A	N/A
N/A	10/25/06 CN 06-029	Revised to clarify that this inspection is associated with Planning Standard 10 CFR 50.47(b)(14), to focus on the timeliness and effectiveness of corrective actions based on safety significance, and conform to the ROP emphasis on correction of EP weaknesses.	No	N/A	ML061790135