

ATTACHMENT 71114.06

INSPECTABLE AREA: Drill Evaluation

CORNERSTONE: Emergency Preparedness

INSPECTION BASES: The Emergency Preparedness (EP) Cornerstone licensee response band is established by the Performance Indicator (PI) system and the licensee's corrective action program. The Emergency Response Organization (ERO) Drill Participation PI provides an indication of licensee efforts to develop and maintain key skills through the conduct of performance enhancing experiences. The efficacy of the Drill and Exercise Performance (DEP) PI data is dependent upon the adequacy of the drill and exercise critiques. If the critique program does not appropriately identify EP weaknesses (demonstrated level of performance (e.g., in a drill) that could preclude effective implementation of the Emergency Plan in the event of an actual emergency), the DEP PI licensee response band comes into question.

These two PIs, complemented by the effective conduct of drills and exercises, effective assessment of performance via a formal critique process and the effective correction of weaknesses, allow 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.

This inspection evaluates the adequacy of the licensee conduct of drills and assessment of performance via a formal critique process in order to identify and correct EP weaknesses. The inspection activity 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: Resident Inspector evaluation of the adequacy of the licensee conduct of drills and certain training evolutions, and the licensee's assessment of performance via a formal critique process in order to identify and correct EP weaknesses.

71114.06-01 INSPECTION OBJECTIVE

01.01 To evaluate the adequacy of the licensee's conduct of selected drills and certain training evolutions and the licensee's ability to assess performance via a formal critique process in order to identify and correct EP weaknesses.

71114.06-02 INSPECTION REQUIREMENTS

02.01 Determine which EP drills and training evolutions the licensee has identified as contributing to the DEP and ERO PIs. Plan to inspect a sample of three drills and/or training evolutions, such that a minimum of one EP drill is observed in addition to two other drills and/or training evolutions.

02.02 Perform independent observations of licensee performance during the EP drill/training evolution. Emphasis is to be placed upon the risk-significant activities of classification, notification, dose assessment and protective action recommendation (PAR) development.

02.03 Evaluate if an EP weakness observed by the inspector was appropriately identified by the licensee's formal critique and entered into the corrective action program.

02.04 Determine whether licensee assessment of EP performance with regard to activities contributing to the DEP PI is in accordance with the applicable criteria of NEI 99-02.

71114.06-03 INSPECTION GUIDANCE

The primary focus of this inspection is to verify licensee critique of the risk-significant areas of classification, notification, dose assessment and PAR development during EP drills and training evolutions identified as contributing data to the DEP and ERO PIs. The guidance provided in section 71114-03, "Prioritization of Additional Areas for Inspection," may be used to select other areas for review.

03.01 Obtain the licensee's schedule of EP drills and training evolutions that will contribute to DEP (and ERO) PI statistics. Inspect as a minimum one EP drill, and some combination of two EP drills and/or simulator-based licensed operator requalification training (LORT) evolutions involving shift operating crews (total of three samples). The resident inspector should observe training evolutions that contribute to the DEP PI, and may perform this activity unannounced.

Note: The licensee is not required to include any simulator-based LORT training evolutions in DEP PI statistics, but may choose to do so in order to credit shift operating crews for drill participation in support of the ERO PI. Additionally, the licensee may wish to collect "as found" operator proficiency information. There is no intent to disrupt ongoing operator qualification programs.

Review the selected drill/training evolution scenario to identify the timing and location of classification, notification and PAR development activities and licensee expectations of a successful response. Responsibility for classification, notification and PAR development activities may transition from the Control Room to the Technical Support Center (TSC) to the Emergency Operations Facility (EOF) during a drill. Inspector resources may limit the ability to observe all aspects. However, classification, notification and PAR development performance should be given the highest priority. The guidance provided in section 71114-03, "Prioritization of Additional Areas for Inspection," may be used to select other areas for review.

Refer to NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Section 2.4, Emergency Preparedness Cornerstone, ERO Drill Participation, Clarifying Notes, to understand how drills and training evolutions qualify as performance enhancing experiences. Determine whether the drill/training evolution qualifies to be included in the DEP (and ERO) PI statistics.

Review the Emergency Plan Implementing Procedures (EPIPs) that provide instructions for classification, notification, dose assessment, and PAR development activities, to develop an understanding of the criteria for timely and accurate completion of these activities based on the EPIPs, the scenario, and NEI 99-02.

03.02 Independently observe the drill/training evolution. Review checklists and forms used for classification, notification and PAR development activities. Identify any weaknesses in licensee performance of classification, notification, PAR development and other observed EP areas and activities (See Section 71114-03, "Prioritization of Additional Areas for Inspection"). Inspector identified weaknesses must be held confidential until after the licensee's formal critique.

Note: Prompting of drill participants is not a finding under the assessment process because it represents no risk significance in itself. However, prompting could negate the validity of a DEP PI opportunity and should be documented when observed.

03.03 Observe the licensee's formal critique of the EP drill/training evolution. Determine if the licensee critique identified the weaknesses observed by the inspector. Licensee critique failures shall be documented and assessed for significance. Determine whether the licensee is properly identifying failures in classification, notification and PAR development activities. Verify that licensee-identified weaknesses are entered into the licensee corrective action system in a manner that will allow NRC review of the resolution in the future.

Poor performance in a drill is not a regulatory issue if the licensee corrects the performance issue or has entered the problem into the corrective action system. The DEP PI captures performance failures and unless the PI falls below the "licensee response band" threshold, correction of drill performance problems is in the licensee response band. However, if the PI falls below this threshold, increased NRC involvement is warranted.

Note: Drill and training activities are only included in PI statistics at the discretion of the licensee and must be identified in advance. However, they cannot be removed from the statistics due to poor performance.

03.04 Determine whether the licensee's assessment of performance is in accordance with the applicable criteria of NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Section 2.4, Emergency Preparedness Cornerstone, Drill/Exercise Performance. Determine whether the licensee is properly dispositioning failures in classification, notification and PAR development activities with regard to PI statistics. Refer any discrepancies to regional management and HQ NSIR/DPR.

71114.06-04 RESOURCE ESTIMATE

The direct inspection effort is estimated to be, on average, between 9 hours and 20 hours per year, regardless of the number of reactor units at a site.

71114.06-05 PROCEDURE COMPLETION

Inspection of the minimum sample size will constitute completion of this procedure in the Reactor Programs System (RPS). That minimum sample size consists of 3 samples representing inspector observation of 1 EP drill and 2 additional drills and/or training evolutions.

END

Attachment 1

Revision History For IP 71114.06

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	Minor wording changes to clarify that the EP cornerstone licensee response band is established by the PI system and the licensee's corrective action program, the importance of the formal critique process to identify EP weaknesses, and that this inspection activity is associated with planning standard 10 CFR 50.47(b)(14).	No	N/A	ML061790139