

FAQ Log 7/19/06

TempNo.	PI	Topic	Status	Plant/ Co.
61.1	EP02	ERO Participation Credit for Security related Drill or Exercise	6/14/2006 – Introduced 6/14/2006 – Discussed. NEI action to revise question to better reflect response 7/19/2006 – FAQ revised	Callaway
62.1	MSPI	Component Boundary	7/19 FAQ Introduced	N/A
62.2	MSPI	Cascading Unavailability	7/19 FAQ Introduced	N/A

FAQ 61.1

Plant: Callaway

Date of Event: N/A

Submittal Date: 06/14/06

Licensee Contact:

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Performance Indicator

Emergency Preparedness Cornerstone

Emergency Response Organization Drill Participation

Site-Specific FAQ: NO

FAQ is requested to become effective when approved. This FAQ is also applicable to the Callaway drill run on March 1, 2006.

Question Section

Can ERO members assigned to fill Key Positions in the TSC and EOF be granted credit for ERO Participation for a Security related Drill or Exercise as defined in NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events", when no DEP opportunity exist for these facilities.

Response Section

Proposed Resolution of FAQ

Yes, ERO members assigned to fill Key Positions in the TSC and EOF can be granted credit for ERO Participation for a Security related Drill or Exercise, which was conducted in keeping with draft guidance document NEI 06-04, as long as the drill is performance enhancing and Participation credit is not granted for two consecutive Security Drills.

The Senior Manager - TSC, Senior Manager - EOF, Key Operations Support - TSC, Key Radiological Controls - TSC and Key may be granted participation credit as long as the Key Positions are observed evaluating the need to upgrade to the next higher classification level and/or evaluating the need to change protective action recommendations.

Key TSC Communicator and Key EOF Communicator may be granted participation credit as long as the Key Position performs at a minimum one offsite (state /local) update notification.

Objective evidence shall be made available to demonstrate the above requirements were met to the NRC Regional EP inspector when the inspector is performing PI verification. Examples of objective evidence are player logs, evaluator or controller notes, dose calculations, worksheets and offsite (state/local) notification paperwork.

Background Information

The Clarifying Notes section (revision 4, page 45, starting at sentence 29) states that, "The license may designate drills as not contributing to DEP and, if the drill provides a performance enhancing experience as described herein, those Key Positions that do not involve classification, notification or PARs may be given credit for ERO Drill Participation". The Clarifying Notes section (revision 4, page 46, starting at sentence 25) also states, "ERO members may receive credit for the drill if their participation is a meaningful opportunity to gain proficiency in their ERO function."

In order for a security drill or exercise to be considered a performance enhancing experience/meaningful opportunity to gain proficiency for key personnel the drill or exercise needs to demonstrate major elements of the emergency plan and key team skills for mitigating the security based event and will require activation of all of the licensee's emergency response facilities where participation credit is provided for Key Positions (Technical Support Center (TSC), Operations Support Center (OSC), and the Emergency Operations Facility (EOF)) . These facilities are activated after aircraft impact or an attack without warning (post perpetrator neutralization) to the protected area. Examples of skills used by members of the ERO for mitigating security based events post aircraft impact or attack that demonstrate major elements of the emergency plan are :

- Exercising management and coordination of the overall emergency response,
- Interfacing with on site Security personnel,
- Assessment of classification, notifications and / or PARs (initial classification, notification or PARs will only be demonstrated by the Control Room. However it is expected that the TSC and EOF will be involved with performing update notifications and revalidation of current classification and PARs as the event unfolds. This continuing revalidation of classification and PARs and subsequent communications with offsite authorities will provide practice in these elements during Security Drills), Objective evidence will need to be maintained as discussed in the answer section of this FAQ.;
- Accounting for all individuals on site, which includes direction of search and rescue activities, mass casualty response and coordination of the medical response,
- Coordination of onsite fire response and coordination of offsite fire resources,
- Approval of public information,
- Field team verification of no radioactive release,
- Interfacing with Law enforcement agencies in response to a crime scene investigation,

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- Repair and corrective actions of plant equipment damaged in the security event which may include allocation of limited resources and authorization of high radiation exposure work in excess of part 20 limits,
- Simulated interaction or actual interaction with NRC regional and national EOCs.

Because Security Drills are performance enhancing experiences, licenses may therefore designate a Security Drill or Exercise as not contributing to DEP in the TSC and EOF and still give participation credit for all ERO members assigned to fill Key Positions in the TSC and EOF.

Because of the linkage to DEP, it is expected that participation credit will not be granted for participation in two successive Security Drills for Key Members normally involved in DEP opportunities in the TSC and/or EOF.

Proposed wording for inclusion in the next revision:

Revise Clarifying Notes to add the following paragraph:

ERO members assigned to fill Key Positions in the TSC and EOF be granted credit for ERO Participation for a Security related Drill or Exercise, which does not include a radiological release and subsequent classification upgrade, change in PAR or initial notification after the TSC and/or EOF are activated, as long as the drill is performance enhancing and Participation credit is not granted for two consecutive Security Drills.

The Senior Manager - TSC, Senior Manager - EOF, Key Operations Support – TSC, Key Radiological Controls - TSC and Key may be granted participation credit as long as the Key Positions are observed evaluating the need to upgrade to the next higher classification level and/or evaluating the need to change protective action recommendations.

Key TSC Communicator and Key EOF Communicator may be granted participation credit as long as the Key Position performs at a minimum one offsite (state /local) update notification.

Objective evidence shall be made available to demonstrate the above requirements were met to the NRC Regional EP inspector when the inspector is performing PI verification. Examples of objective evidence are player logs, evaluator or controller notes, dose calculations, worksheets and offsite (state/local) notification paperwork.

None

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Plant: Generic
Date of Event: NA
Submittal Date: July 18, 2006
Licensee Contact: John Butler

Performance Indicator: MSPI
Site Specific FAQ? No

FAQ requested to become effective when approved.

Question Section

Pages F-18, lines 8-10 and F-19, line 1 state: *"For control and motive power, only the last relay, breaker or contactor necessary to power or control the component is included in the monitored component boundary. For example, if an ESFAS signal actuates a MOV, only a relay that receives the ESFAS signal in the control circuitry for the MOV is in the MOV boundary. No other portions of the ESFAS are included."*

Licensees have expressed difficulty interpreting the guidance as written.

Response Section

The definition of a supporting component as described in the EPIX guidance, INPO 98-001, provides a better description of the intent for component boundaries with respect to control circuits.

Pages F-18, lines 8-10 and F-19, line 1 will be changed to:

"For control and motive power, supporting components as described in INPO 98-01 should be included in the monitored component boundary. In other words, if the relay, breaker or contactor exists solely to support the operation of the monitored component, it should be considered part of the component boundary. If a relay, breaker or contactor supports multiple components, it should not be considered as part of the monitored component boundary."

FAQ 62.2

Plant: All
Date of Event: N/A
Submittal Date: 07/19/2006
Licensee Contact: John Butler (NEI) **Tel/email:** (202)739-8108, jcb@nei.org
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Performance Indicator: MSPI (MS06 – MS10)

Site-Specific FAQ (Appendix D)? No

FAQ requested to become effective when approved

Question Section

The following guidance clarification is requested to be inserted into NEI 99-02:

Discussion

One of the tenets of MSPI is that it eliminates cascading of support system unavailability onto front line system.

NEI 99-02, Revision 4 (page 28, line 4-5) states, "*No support systems are to be cascaded onto the monitored systems, e.g., HVAC room coolers, DC power, instrument air, etc.*"

There are times when a support system is unavailable (e.g., under clearance to perform maintenance). This unavailability is not cascaded onto the supported systems. An example would be support cooling water for an EDG. If the support cooling water system is out of service, the EDG would be unable to perform its risk significant function. However, this would not be reported as unavailability under MSPI for the EDG.

In some cases, for equipment protection, plants will disable the autostart of a monitored component when the support system is out of service. This is done for the purposes of equipment protection. This could be accomplished by putting the monitored component in "maintenance" mode or by pulling the control fuses of the monitored component.

Clarification of NEI 99-02 guidance is requested to address situations where a monitored component is disabled, in response to a support system being unavailable.

Response Section

If no maintenance is performed on the monitored component and it is only disabled for equipment protection due to a support system being out of service, no unavailability should be reported for the monitored component. Reporting unavailability of the monitored component would be equivalent to cascading unavailability.

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The following should be added to Section F.1.2.1 of NEI 99-02:

No Cascading of Unavailability

In some cases plants will disable the autostart of a monitored component when the support system is out of service. This is done for the purposes of equipment protection. This could be accomplished by putting the monitored component in "maintenance" mode or by pulling the control fuses of the monitored component. If no maintenance is being performed on the monitored component and it is only disabled for equipment protection due to a support system being out of service, no unavailability should be reported for the monitored component.

Definition for an Actual ESF Demand as used by MSPI

An actual ESF demand is any condition that results in valid actuation, manual or automatic, of any of the MSPI systems due to actual or perceived plant conditions requiring the actuation. These conditions should be counted in MSPI as actual ESF demands except when:

- 1) The actuation resulted from and was part of a pre-planned sequence during testing or reactor operation; or
- 2) The actuation was invalid; or
- 3) Occurred while the system was properly removed from service; or
- 4) Occurred after the safety function had been already completed.

Valid actuations are those actuations that result from "valid signals" or from intentional manual initiation, unless it is part of a preplanned test. Valid signals are those signals that are initiated in response to actual plant conditions or parameters satisfying the requirements for initiation of the safety function of the system. They do not include those which are the result of other signals. Invalid actuations are, by definition, those that do not meet the criteria for being valid. Thus, invalid actuations include actuations that are not the result of valid signals and are not intentional manual actuations.

With regard to preplanned actuations, operation of a system as part of a planned test or operational evolution should not be counted in MSPI as actual ESF demands, but rather as operational or test demands. Preplanned actuations are those which are expected to actually occur due to preplanned activities covered by procedures. Such actuations are those for which a procedural step or other appropriate documentation indicates the specific actuation is actually expected to occur. Control room personnel are aware of the specific signal generation before its occurrence or indication in the control room. However, if during the test or evolution, the system actuates in a way that is not part of the planned evolution, that actuation should be counted.

Actual ESF demands occur when the setpoints for automatic safety system actuation are met or exceeded and usually include the actuation of multiple trains and systems. Automatic actuation of standby trains on a failure of a running train should not be considered as an actual ESF demand. Actuations caused by operator error, maintenance errors, etc. that are not due to actual plant requirements should be considered as "invalid" actuations and not counted in MSPI as actual ESF demands.