#### UNITED STATES



NUCLEAR REGULATORY COMMISSION

REGION II SAM NUNN ATLANTA FEDERAL CENTER 61 FORSYTH STREET, SW, SUITE 23T85 ATLANTA, GEORGIA 30303-8931

June 20, 2006

EA-06-132

Southern Nuclear Operating Company, Inc. ATTN: Mr. D. E. Grissette, Vice President P. O. Box 1295 Birmingham, AL 35201-1295

### SUBJECT: VOGTLE ELECTRIC GENERATING PLANT - NRC EMERGENCY PREPAREDNESS INSPECTION REPORT NO. 5000424/2006009 AND 5000425/2006009; PRELIMINARY WHITE FINDING

Dear Mr. Grissette:

On March 24, 2006, the U. S. Nuclear Regulatory Commission (NRC) completed an inspection at your Vogtle Electric Generating Plant (VEGP), Units 1 and 2. The enclosed report documents the inspection results, which were discussed on June 5, 2006, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. The inspection also included a review of the circumstances involving the failure of the Vogtle full-scale exercise critique to identify a weakness associated with a risk-significant planning standard (RSPS) that was determined to be a Drill/Exercise Performance (DEP) Performance Indicator (PI) opportunity failure.

Based on the NRC's review of this issue, the failure of the licensee's full-scale exercise critique to identify a weakness associated with an RSPS that was determined to be a DEP PI opportunity failure is a performance deficiency and an apparent violation associated with emergency preparedness planning standards 10 CFR 50.47(b)(14) and 10 CFR 50.54(b)(4) and the requirements of Section IV.F.2.g of Appendix E to 10 CFR Part 50.

This finding was assessed using the applicable Emergency Preparedness Significance Determination Process (SDP) and was preliminarily determined to be of low-to-moderate safety significance (White) because the planning standard (PS) function was lost in that the critique failed to identify a DEP PI opportunity failure during a full-scale exercise, where there are multiple emergency response facilities (ERFs) participating and a team of evaluators as discussed in NRC Manual Chapter 0609, Appendix B, Section 4.14. Additional details associated with this determination are discussed in Section 1EP1 of the enclosed inspection report.

Before we make a final decision on this matter, we are providing you an opportunity to: (1) present to the NRC your perspectives on the facts and assumptions used by the NRC to arrive at the finding and its significance, at a Regulatory Conference, or (2) submit your position on the finding to the NRC in writing. If you request a Regulatory Conference, it should be held within 30 days of the receipt of this letter and we encourage you to submit supporting documentation at least one week prior to the conference in an effort to make the conference more efficient and effective. If a Regulatory Conference is held, it will be open for public observation. The NRC will also issue a press release to announce the conference. If you decide to submit only a written response, such submittal should be sent to the NRC within 30 days of the receipt of this letter.

Please contact Mr. Brian Bonser at (404) 562-4653 within 10 business days of the date of your receipt of this letter to notify the NRC of your intentions. If we have not heard from you within 10 days, we will continue with our significance determination decision and you will be advised by separate correspondence of the results of our deliberations on this matter.

Since this finding is an apparent violation of NRC requirements, escalated enforcement action is being considered in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at *www.nrc.gov;* select What We Do, Enforcement, then Enforcement Policy.

Since the NRC has not made a final determination in this matter, no Notice of Violation is being issued for this inspection finding at this time. In addition, please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of theNRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <u>http://www.nrc.gov/reading-rm/adams.html</u> (the Public Electronic Reading Room).

Sincerely,

/RA: original signed by Harold Christensen for/

Victor M. McCree, Director Division of Reactor Safety

Docket Nos. 50-424, 50-425 License Nos. NPF-68, NPF-81

Enclosure: NRC Inspection Report No. 05000424/2006009 and 05000425/2006009 w/Attachment: Supplemental Information

cc w/encl: (See page 3)

cc w/encl: J. T. Gasser Executive Vice President Southern Nuclear Operating Company, Inc. Electronic Mail Distribution

T. E. Tynan General Manager, Plant Vogtle Southern Nuclear Operating Company, Inc. Electronic Mail Distribution

N. J. Stringfellow Manager-Licensing Southern Nuclear Operating Company, Inc. Electronic Mail Distribution

Bentina C. Terry Southern Nuclear Operating Company, Inc. Bin B-022 P. O. Box 1295 Birmingham, AL 35201-1295

Director, Consumers' Utility Counsel Division Governor's Office of Consumer Affairs 2 M. L. King, Jr. Drive Plaza Level East; Suite 356 Atlanta, GA 30334-4600

Office of the County Commissioner Burke County Commission Waynesboro, GA 30830

Director, Department of Natural Resources 205 Butler Street, SE, Suite 1252 Atlanta, GA 30334

Manager, Radioactive Materials Program Department of Natural Resources Electronic Mail Distribution

Attorney General Law Department 132 Judicial Building Atlanta, GA 30334

(cc w/encl cont'd - See page 4)

(cc w/encl cont'd) Laurence Bergen Oglethorpe Power Corporation Electronic Mail Distribution

Resident Manager Oglethorpe Power Corporation Alvin W. Vogtle Nuclear Plant Electronic Mail Distribution

Arthur H. Domby, Esq. Troutman Sanders Electronic Mail Distributioin

Senior Engineer - Power Supply Municipal Electric Authority of Georgia Electronic Mail Distribution

Reece McAlister Executive Secretary Georgia Public Service Commission 244 Washington Street, SW Atlanta, GA 30334

Before we make a final decision on this matter, we are providing you an opportunity to: (1) present to the NRC your perspectives on the facts and assumptions used by the NRC to arrive at the finding and its significance, at a Regulatory Conference, or (2) submit your position on the finding to the NRC in writing. If you request a Regulatory Conference, it should be held within 30 days of the receipt of this letter and we encourage you to submit supporting documentation at least one week prior to the conference in an effort to make the conference more efficient and effective. If a Regulatory Conference is held, it will be open for public observation. The NRC will also issue a press release to announce the conference. If you decide to submit only a written response, such submittal should be sent to the NRC within 30 days of the receipt of this letter.

Please contact Mr. Brian Bonser at (404) 562-4653 within 10 business days of the date of your receipt of this letter to notify the NRC of your intentions. If we have not heard from you within 10 days, we will continue with our significance determination decision and you will be advised by separate correspondence of the results of our deliberations on this matter.

Since this finding is an apparent violation of NRC requirements, escalated enforcement action is being considered in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at www.nrc.gov; select What We Do, Enforcement, then Enforcement Policy.

Since the NRC has not made a final determination in this matter, no Notice of Violation is being issued for this inspection finding at this time. In addition, please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of theNRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA: original signed by Harold Christensen for/ Victor M. McCree, Director **Division of Reactor Safety** 

Docket Nos. 50-424, 50-425 License Nos. NPF-68, NPF-81

Enclosure: NRC Inspection Report No. 05000424/2006009 and 05000425/2006009 w/Attachment: Supplemental Information

cc w/encl: (See page 3)

PLEASE SEE PREVIOUS PAGE AND ATTACHED EMAILS FOR CONCURRENCE X PUBLICLY AVAILABLE NON-PUBLICLY AVAILABLE 

X □ NON-SENSITIVE

ADAMS: X 
Yes ACCESSION NUMBER: ML061720368

OFFICE	RII:DRS	RII;DRS	RII:DRP	RII:DRP	RII:DRP	RII:DRS	RII:EICS
SIGNATURE	RA	RA	RA	RA	RA	RA	RA
NAME	KREH	MILLER	ANDERSON	MCCOY	SHAEFFER	BONSER	EVANS
DATE	6/15/2006	6/15/2006	6/14/2006	6/13/2006	6/15/2006	8/ /2006	6/15/2006
E-MAIL COPY?	YES NO	YES NO	YES NO				

OFFICIAL RECORD COPY DOCUMENT NAME: E:\Filenet\ML062150096.wpd

# **U. S. NUCLEAR REGULATORY COMMISSION**

## **REGION II**

Docket Nos.:	50-424, 50-425			
License Nos.:	NPF-68, NPF-81			
Report No.:	05000424/2006009 and 05000425/2006009			
Licensee:	Southern Nuclear Operating Company, Inc.			
Facility:	Vogtle Electric Generating Plant, Units 1 and 2			
Location:	7821 River Road Waynesboro, GA 30830			
Dates:	March 20-24, 2006			
Inspectors:	L. Miller, Senior Emergency Preparedness Inspector (Sections 1EP1, 1EP4, 4OA1) J. Kreh, Emergency Preparedness Inspector (Section 1EI G. McCoy, Senior Resident Inspector (Section 1EP1) B. Anderson, Resident Inspector (Section 1EP1)			
Approved by:	Brian R. Bonser, Chief Plant Support Branch 2 Division of Reactor Safety			

## SUMMARY OF FINDINGS

IR 05000424/2006009, 05000425/2006009; 03/20-24/2006; Vogtle Electric Generating Plant, Units 1 and 2; Exercise Evaluation

The report covered an announced inspection by a team of two emergency preparedness inspectors and two resident inspectors. One apparent violation (AV) item, with potential safety significance greater than Green, was identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

## A. NRC-Identified and Self-Revealing Findings

Cornerstone: Emergency Preparedness

<u>TBD.</u> The NRC identified an AV for failure of the licensee's exercise critique process to properly identify a weakness associated with a risk-significant planning standard (RSPS) that was determined to be a Drill/Exercise Performance (DEP) Performance Indicator (PI) opportunity failure during a full-scale exercise. The AV is associated with emergency preparedness planning standards 10 CFR 50.47(b)(14) and 10 CFR 50.47(b)(4) and the requirements of Section IV.F.2.g of Appendix E to 10 CFR Part 50. This finding was not entered into the licensee's corrective action program.

The failure of the licensee's exercise critique process was a performance deficiency. This finding was greater than minor because it was associated with the Emergency Preparedness Cornerstone and affected the cornerstone objective to ensure that the licensee was capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency. The finding was an identified weakness that demonstrated a level of performance that could preclude effective implementation of the Emergency Plan in an actual emergency. This finding was also determined to potentially have greater significance because the licensee's exercise critique process failed to properly identify a weakness associated with an RSPS that was determined to be a DEP PI opportunity failure during a full-scale exercise (Section 1EP1).

B. <u>Licensee-Identified Violations.</u>

None

## 1. **REACTOR SAFETY**

Cornerstone: Emergency Preparedness

#### 1EP1 Exercise Evaluation

a. Inspection Scope

Prior to the inspection activity, the inspectors conducted an in-office review of the exercise objectives and scenario submitted to the NRC to determine if the exercise would test major elements of the emergency plan as required by 10 CFR 50.47(b)(14). This inspection activity represents one sample on a biennial cycle.

The onsite inspection consisted of the following review and assessment:

- The adequacy of the licensee's performance in the biennial exercise conducted on March 22, 2006, was reviewed and assessed regarding the implementation of the risk-significant planning standards (RSPSs) in 10 CFR 50.47 (b) (4), (5), (9), and (10), which address emergency classification, offsite notification, radiological assessment, and protective action recommendations, respectively.
- The overall adequacy of the licensee's emergency response facilities with regard to NUREG-0696, "Functional Criteria for Emergency Response Facilities" and Emergency Plan commitments. The facilities assessed were the Control Room Simulator (CRS), Technical Support Center (TSC), Operational Support Center (OSC), and Emergency Operations Facility (EOF).
- Other performance areas not addressed by the RSPSs, such as recognition by the emergency response organization (ERO) of abnormal plant conditions, command and control, intra- and inter-facility communications, prioritization of mitigation activities, utilization of repair and field monitoring teams, interface with offsite agencies, and the overall implementation of the emergency plan and its implementing procedures.
- Past performance issues from NRC inspection reports and Federal Emergency Management Agency (FEMA) exercise reports to determine effectiveness of corrective actions as demonstrated during this exercise to ensure compliance with 10 CFR 50.47(b)(14).
- The post-exercise critique conducted on March 24, 2006, to evaluate the licensee's self-assessment of its ERO performance during the exercise and to ensure compliance with Section IV.F.2.g of Appendix E to 10 CFR Part 50.

The inspectors reviewed various documents which are listed in the Attachment to this report.

#### b. Findings

<u>Introduction</u>. The inspectors identified an apparent violation associated with emergency preparedness planning standards 10 CFR 50.47(b)(14) and 10 CFR 50.47(b)(4) and the requirements of Section IV.F.2.g of Appendix E to 10 CFR Part 50.

<u>Description.</u> The Emergency Preparedness Cornerstone licensee response band is established by the PI scheme and the licensee's corrective action program. Data for the DEP and ERO PI values come from the drill and exercise critiques. The baseline inspection program is based on accurate PI data that properly reflects licensee performance. The DEP PI is based on the licensee's ability to determine whether a PI opportunity is successful. A single failure to identify a weakness associated with an RSPS during a full-scale exercise is a high standard based on NRC's need to ensure the efficacy of the licensee's critique program. Thus, a licensee's ability to observe, evaluate, and critique a weakness associated with an RSPS is critical.

The inspectors identified a risk-significant performance deficiency involving a failure of the licensee's exercise critique process to identify a weakness associated with an RSPS that was determined to be a DEP PI opportunity failure. The inspectors determined that the licensee's exercise critique did not identify a weakness that occurred during the exercise on March 22, 2006. The weakness occurred when the Shift Manager (SM) evaluated plant conditions as meeting the Emergency Action Level (EAL) criteria for a Site Area Emergency (SAE) without verifying and validating that the subject criteria had been met, resulting in an incorrect SAE emergency classification. The SM announced his decision to declare a SAE based on:

(1) reactor coolant system (RCS) activity greater than 300  $\mu$ Ci/gram I-131 equivalent (Loss of the Fuel Clad Barrier)

#### AND

(2) a non-isolable RCS leak in excess of the capacity of one charging pump in the normal charging mode (Potential Loss of RCS Barrier).

The EALs contained other possible criteria for identifying a Potential Loss of RCS Barrier: either "Heat Sink CSFST [Critical Safety Function Status Tree] RED" or "RCS Integrity CSFST RED", but neither of these conditions was present. Furthermore, the Emergency Director "Judgment" criterion was not invoked with respect to the RCS Barrier being Lost or Potentially Lost <u>OR</u> the inability to determine the status of the RCS Barrier.

In the licensee's emergency classification scheme, a "Loss of ONE barrier AND a Potential Loss of a SECOND barrier" meets the criteria for an SAE. "Loss of ONE barrier" was based on correct and validated information, and met the criterion for an Alert declaration (an Alert had already been declared). The SM had indicated that "a Potential Loss of a SECOND barrier" was met by having a "NON-Isolable RCS leak (including SG [Steam Generator] Tube Leakage) GREATER THAN the capacity of one charging pump in normal charging mode." A non-isolable RCS leak had not occurred before the SM made his declaration of the SAE. Immediately after the SM declared the SAE and before the SAE notification was made, a licensee exercise controller intervened to inform the SM that an RCS barrier failure had not occurred, that a safety injection had not been required for RCS leak mitigation purposes, and that the exercise would continue at the previously declared Alert classification level. The exercise participants outside the CRS had not been informed of the SAE declaration.

The licensee's critique determined that the SAE classification was appropriate and correct given the plant conditions, and that the classification was a successful DEP PI opportunity. The critique also stated that the SAE declaration was blocked by the controller only to keep the exercise scenario on the designated time line in order to avoid potential confusion for offsite responders.

At the exit meeting on March 24, 2006, the inspectors requested CRS data from the exercise. Licensee management stated that the simulator data were not available because they had not been saved at the conclusion of the exercise. The inspectors then requested that the licensee perform three additional simulator runs under various specified conditions using the same exercise scenario in order to provide more information for the NRC's determination as to the validity of the SM's decision that SAE criteria had been met. The requested additional information was provided to the NRC on April 14, 2006. On April 18, 2006, a teleconference was held with licensee technical staff and management in order to ask questions and to obtain clarification of certain matters with respect to the submitted information.

Following the NRC's preliminary analysis of the additional information provided by the licensee, a re-exit meeting was conducted by teleconference on May 8, 2006, in which the licensee was informed that, pending further NRC staff review using the Significance Determination Process, the subject issue would be classified as an Unresolved Item in a separate inspection report to be issued within 30 days, and that the NRC would process the issue as a potential greater than Green finding.

During a teleconference on June 2, 2006, the licensee discussed the sequence of events and Emergency Operating Procedures (EOPs) which the crew utilized leading up to the SM's classification of the SAE. It is understood that the EOPs are symptombased and provide direction to address those symptoms. Where the EOPs are symptom-based, the licensee's Emergency Plan EALs, written to NUMARC/NESP-007, Methodology for Development of Emergency Action Levels, Revision 2, use a combination of event-based, barrier-based, and symptom-based criteria. The licensee stated that the SM used EOP 19000-C, E-0 Reactor Trip or Safety Injection, step 32, to transition to EOP 19010-C, E-1 Loss of Reactor or Secondary Coolant, and declare the SAE. There was no direction in EOP 19000 –C, step 32, to go to EOP 91001-C, Emergency Classification and Implementing Instructions, and declare an SAE. The licensee stated that the SM and the crew had not taken actions to verify that a non-isolable RCS leak had occurred. The SM did not ensure that the potential loss of the RCS barrier, indicated by a non-isolable RCS leak in excess of the capacity of one charging pump in the normal charging mode, was in fact met. The licensee stated that SM was required to make the classification decision before the 15-minute goal for timeliness of classifications, as stated in NEI 99-02, Rev. 3, had expired. The licensee stated that approximately half of the 15 minutes had passed from the time that the first condition, reactor coolant system (RCS) activity greater than  $300 \ \mu\text{Ci/gram I-131}$  equivalent (Loss of the Fuel Clad Barrier), was met and that most of the remaining time had elapsed in determining whether the second condition (potential loss of the RCS barrier) was met for the SAE; therefore, the SM had only minutes to make the decision that a SAE existed. Classification is expected to be made promptly following indication that the conditions have reached an emergency threshold in accordance with the licensee's EAL scheme. With respect to classification of emergencies, the 15-minute goal is a reasonable period of time for assessing and classifying an emergency once indications are available to control room operators that an EAL has been exceeded. The 15-minute classification time does not start until all indications are available (i.e., both conditions for the SAE are met).

On June 3, 2006, NRC staff review was completed and a determination was made that an AV had occurred. Licensee management was informed of this determination in a teleconference on June 5, 2006.

<u>Analysis.</u> The licensee's exercise critique process failure was a performance deficiency. This finding was greater than minor because it affects the Emergency Preparedness Cornerstone objective to ensure that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency.

The finding is an identified weakness that demonstrated a level of performance that could preclude effective implementation of the Emergency Plan in an actual emergency. This finding is also determined to potentially have greater significance because the licensee's exercise critique process failed to properly identify a weakness associated with an RSPS that was determined to be a DEP PI opportunity failure during a full-scale exercise.

The inspectors assessed the finding using the Emergency Preparedness Significance Determination Process (Appendix B to IMC 0609) and preliminarily determined the finding to be of low-to-moderate safety significance (White). A loss of PS function occurred when the exercise critique process failed to identify a weakness associated with an RSPS. Failure to critique the inaccurate classification is considered a loss of PS function and a white finding. This is because the licensee's capacity to observe and evaluate the process associated with an RSPS is questionable. Appendix B to IMC 0609, Sheet 1 (Failure to Comply) and Section 4.14 were used to reach this preliminary determination.

Section IV.F.2.g of Appendix E to 10 CFR Part 50 requires licensees to identify and correct weaknesses. The identification and correction of weaknesses is fundamentally important to the EP Cornerstone Objective. A failure of a critique to identify a weakness is a finding with a corresponding potential violation of 10 CFR 50.47(b)(14) and Section IV.F.2.g of Appendix E to 10 CFR Part 50.

<u>Enforcement.</u> 10 CFR 50.47(b)(14) requires, in part, that periodic exercises be conducted to evaluate major portions of emergency response capabilities and that deficiencies identified as a result of exercises are corrected.

10 CFR 50.47(b)(4) requires, in part, that a standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and that State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Section IV.F.2.g of Appendix E to 10 CFR Part 50 requires that all training, including exercises, shall provide for formal critiques in order to identify weak or deficient areas that need correction. Any weaknesses or deficiencies that are identified shall be corrected.

Contrary to the above, during the critique of the March 22, 2006 exercise, the licensee failed to identify a DEP PI opportunity failure, in that the licensee counted an incorrect classification as an opportunity success. The incorrect classification should be considered a missed opportunity or opportunity failure.

This finding is identified as Apparent Violation (AV) 50-424, 50-425/2006009-001, Failure of Exercise Critique to identify an RSPS weakness as a DEP PI opportunity Failure. This issue has not yet been entered into the licensee's corrective action system.

#### 1EP4 Emergency Action Level (EAL) and Emergency Plan Changes

#### a. <u>Inspection Scope</u>

The inspectors reviewed changes to the emergency plan, implementing procedures and EALs to determine whether such changes had decreased the effectiveness of the plan. The inspectors also evaluated the 10 CFR 50.54(q) reviews associated with non-administrative emergency plan, implementing procedures and EAL changes. The review included Revisions 41 and 42 to the Vogtle Emergency Plan.

The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 04, "Emergency Action Level and Emergency Plan Changes." The applicable PS, 10 CFR 50.47(b)(4) and its related 10 CFR Part 50, Appendix E requirements were used as reference criteria. The criteria contained in NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1, Regulatory Guide 1.101 were also used as references. This inspection activity represents one sample on an annual basis.

The inspectors reviewed various documents which are listed in the Attachment to this report.

#### b. Findings

No findings of significance were identified.

### 4. OTHER ACTIVITIES

#### 4OA1 Performance Indicator (PI) Verification

#### d. Inspection Scope

The inspectors reviewed the licensee's procedure for developing the data for the Emergency Preparedness PIs, which are: (1) DEP; (2) ERO Drill Participation; and (3) Alert and Notification System (ANS) Reliability. The inspectors examined data reported to the NRC for the period July 1 to December 31, 2005. Procedural guidance for reporting PI information and records used by the licensee to identify potential PI occurrences were also reviewed. The inspectors verified the accuracy of the PI for ERO drill and exercise performance through review of a sample of drill and event records. The inspectors reviewed selected training records to verify the accuracy of the PI for ERO drill participation for personnel assigned to key positions in the ERO. The inspectors verified the accuracy of the PI for ERO drill participation for personnel assigned to key positions in the ERO. The inspectors verified the accuracy of the PI for alert and notification system reliability through review of a sample of the licensee's records of periodic system tests.

The inspection was conducted in accordance with NRC Inspection Procedure 71151, "Performance Indicator Verification." The applicable planning standard, 10 CFR 50.9 and Nuclear Energy Institute (NEI) 99-02, Revision 3, "Regulatory Assessment Performance Indicator Guidelines," were used as reference criteria. This inspection activity represents three samples on an annual basis.

The inspectors reviewed various documents which are listed in the Attachment to this report.

#### b. Findings

No findings of significance were identified.

#### 4OA6 Meetings, including Exit

On March 24, 2006, the inspectors presented the inspection results to Mr. T. Tynan and other members of his staff. The inspectors confirmed that proprietary information was not provided or taken during the inspection.

Following preliminary review of the additional information provided by the licensee, a reexit meeting was held via teleconference on May 8, 2006 with Mr. R. Dedrickson and other members of his staff. Upon completion of NRC staff review of the potential finding and the determination that an AV had occurred, licensee management was informed of this determination in a teleconference on June 5, 2006 with Mr. D. Grissette, Mr. T. Tynan and other members of their staffs.

ATTACHMENT: SUPPLEMENTAL INFORMATION

## SUPPLEMENTAL INFORMATION

## **KEY POINTS OF CONTACT**

### Licensee personnel

R. Brown, Training and Emergency Preparedness Manager

W. Copeland, Performance Analysis Supervisor

R. Dedrickson, Assistant General Manager - Operations

B. George, Manager, Nuclear Licensing

D. Grissette, Vice President, Vogtle Project

I. Kochery, Health Physics Manager

W. Lee, Corporate Emergency Preparedness Manager

L. Mayo, Site Emergency Preparedness Coordinator

A. Thornhill, Managing Attorney and Compliance Manager

T. Tynan, General Manager

C. Williams, Operations Support Superintendent

## LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

50-424, 50-425/2006009-001 AV

Failure of Exercise Critique to identify an RSPS weakness as a DEP PI opportunity failure (Section 1EP1)

<u>Closed</u>

None

Discussed

None

## LIST OF DOCUMENTS REVIEWED

### Section 1EP1: Exercise Evaluation

#### Plans and Procedures

10020-C, EOP and AOP Rules of Usage, Rev. 3 17007-1, Annunciator Response Procedures for ALB 07 on Panel 1A2 on MCB, Rev. 25 17011-1, Annunciator Response Procedures for ALB 11 on Panel 1C1 on MCB, Rev. 14 18001-C, Primary Systems Instrumentation Malfunction, Rev. 24 18004-C, Reactor Coolant System Leakage, Rev. 20 18007-C, Chemical and Volume Control System Malfunction, Rev. 18 18039-C, Confirmed Loose Part in the RCS or Steam Generator Secondary Side, Rev. 2 19000-C, E-0, Reactor Trip or Safety Injection, Rev. 31.2 19001-C, ES-0.1, Reactor Trip Response, Rev. 28 19010-C, E-1, Loss of Reactor or Secondary Coolant, Rev. 29 91001-C, Emergency Classification and Implementing Instructions, Rev. 24 91002-C, Emergency Notifications, Rev 45 91101-C, Emergency Response Organization, Rev. 22 91102-C, Duties of the Emergency Director, Rev. 25 91201-C, Activation and Operation of the Technical Support Center, Rev. 13 91304-C, Estimating Offsite Dose, Rev. 18.1 91305-C. Protective Action Guidelines. Rev. 21 91401-C, Assembly and Accountability, Rev. 16.1 91403-C, Site Dismissal, Rev. 14 NMP-EP-101, Emergency Operations Facility (EOF) Activation, Version 2.0 NMP-EP-102, EOF Manager, Version 2.0

NMP-EP-103, Licensing Support, Version 2.0

- NMP-EP-104, Dose Assessment, Version 2.0
- NMP-EP-105, EOF Technical Supervisor, Version 2.0

Miscellaneous Documents

Background Information for Westinghouse Owners Group – Emergency Response Guideline: E-0, Reactor Trip or Safety Injection, HP-Rev. 2, 04/30/2005 Basis Document for E-0, Reactor Trip or Safety Injection, 04/18/200 Basis Document for ES-0.1, Reactor Trip Response, 08/29/2000

#### Records and Data from 03/22/2006 Exercise

Emergency Notification Forms (Messages Nos. 1-7) transmitted to State and local agencies Data from additional requested CRS scenario runs: As Ran; As Ran with Loss-of-Coolant Accident; As Ran with Steam Generator Tube Rupture; 04/14/2006

## Section 1EP4: Emergency Action Level (EAL) and Emergency Plan Changes

### Plans and Procedures

Vogtle Electric Generating Plant, Unit 1 and Unit 2 Emergency Plan, Rev. 41 Vogtle Electric Generating Plant, Unit 1 and Unit 2 Emergency Plan, Rev. 42 91501-C, Recovery, Rev. 16 91304-C, Estimating Offsite Dose, Rev. 18.1 91102-C, Duties of the Emergency Director, Rev. 25 91001-C, Emergency Classification and Implementing Instructions, Rev. 24 91002-C, Emergency Notifications, Rev. 45

### Change Packages

LDCR 2005 046 EP, VEGP Emergency Plan Rev. 41 LDCR 2005 053 EP, NRC Bulletin 2005-02 Security EAL Revision to Emergency Plan

## Section 4OA1: Performance Indicator (PI) Verification

### Procedures

00163-C, NRC Performance Indicator and Monthly Operating Report Preparation and Submittal, Rev. 9

### Records and Data

Documentation package (Scenario/time line/event time line/critique report) for ERO drill held July 29, 2005

Documentation of DEP opportunities, July - December 2005

Documentation of offsite siren weekly test, July - December 2005

Records of drill and exercise participation by ERO personnel, July - December 2005

# LIST OF ACRONYMS

AOP	Abnormal Operating Procedure
AV	Apparent Violation
CRS	Control Room Simulator
DEP	Drill/Exercise Performance
EAL	Emergency Action Level
EOF	Emergency Operations Facility
EOP	Emergency Operating Procedure
ERO	Emergency Response Organization
FEMA	Federal Emergency Management Agency
IMC	Inspection Manual Chapter
MCB	Main Control Board
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
OSC	Operational Support Center
PI	Performance Indicator
PS	Planning Standard
RCS	Reactor Coolant System
RSPS	Risk-Significant Planning Standard
SAE	Site Area Emergency
SDP	Significance Determination Process
SM	Shift Manager
SM	Shift Manager
TSC	Technical Support Center