

Overview of NEI 06-04, Rev. 1

Susan Perkins-Grew
Senior Project Manager, NEI

Phase III Demonstrations in 2007 Using Revision 0

- **Industry Experience in 2007**
 - **Lessons learned**
 - **NRC Observations**
- **NRC's Response**
 - **Endorsement of NEI 06 04 not required for initial Phase III drills**
 - **Phase III should vet guidelines and acquire lessons learned to prepare for Phase IV**
 - **Phase IV proposed under Bulletin 2005-02 that a hostile action-based event would be the initiating event in one biennial EP exercise in the 6-year cycle**



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- **Document was re-titled, restructured and streamlined**
 - **Title was changed**
 - **Focus on the unique attributes that a hostile action-based drill imposes on our existing drill programs**
 - **Provide licensees flexibility**
 - **Provide more specific guidance to promote more consistent implementation**
 - **Restructured to model the process for developing and implementing a hostile action-based drill.**



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- **Specific Lessons Learned and Issues Addressed**
 - **Time Jump**
 - Found that dividing the drill into two parts was not necessary
 - Precluded the demonstration of key decision making and demonstration of certain objectives
 - Start-up for Part 2 was complicated and confusing
 - **Objectives**
 - Rev 0 Objectives were focused on traditional drill demonstration
 - Not enough guidance for unique demonstrations for hostile action scenarios
 - Rev 1 provides “Functional Demonstrations” to focus on demonstration elements that need to be incorporated into a licensee’s drill program



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- **Specific Lessons Learned and Issues Addressed**
 - **Offsite Objectives and Extent of Play**
 - **ORO objectives and EOP should continue to be premised on the standard DHS/FEMA REP exercise criteria.**
 - **Licensees and OROs should continue to design and negotiate objectives and extent of play consistent with their existing programs**
 - **Rev 1 lists considerations and possible exceptions to standard REP exercise criteria that could be employed by OROs in hostile action scenarios**



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- **Specific Lessons Learned and Issues Addressed**
 - **Incident Command System**
 - **Rev 1 recognizes and provides guidance on implementation of ICS by OROs**
 - **Licensee's Incident Command Structure**
 - **Added a specific functional demonstration to coordinate in-plant and onsite response actions among the ERO, Security and Incident Commander.**
 - **Scenario**
 - **Rev 1 promotes a consistent demonstration with sufficient level of challenge**
 - **Scenario development guidance specifies extent of damage that needs to drive a General Emergency**
 - **High-level scenario structures are provided**



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- **Specific Lessons Learned and Issues Addressed**
 - **Scope of Play Between Parts 1 and 2**
 - **Some demonstrations skipped over critical discussions regarding personnel movement and relocation**
 - **To create a more seamless demonstration from the onset of the attack through ERO activation, plant mitigation and PAR decision-making, the division of the drill into two parts is no longer necessary**
 - **Rev 1 provides specific guidance for collaboration between Security, Operations and the site incident command on the relocation/movement of personnel and prompt action to support the Control Room**
 - **Provide initial assessment and mitigation of the event**



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- **Specific Lessons Learned and Issues Addressed**
 - **Station Security Department Involvement in Drill Development**
 - **Successful drill planning and implementation depends on active engagement and collaboration between EP and Security**
 - **Security provides realistic details for credible attack scenario**
 - **Guidance provided for CAS/SAS demonstration of simulated response actions**
 - **Pre-Drill Collaboration with Offsite Stakeholders**
 - **Never too early to introduce offsite partners in the planning process**
 - **Rev 1 emphasizes the importance of including offsite partners in the planning, preparation and implementation of the drills**



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- **Specific Lessons Learned and Issues Addressed**
 - **Integrated Communications**
 - **Guidance on preplanning integrated communications**
 - **Map out and test communication pathways and protocols prior to the drill to identify challenges in these scenarios**
 - **Ensure controllers have sufficient communication capability and ICS/NIMS knowledge**
 - **Fire Fighting and Medical Response**
 - **Additional guidance provided for coordination of Fire/Medical response**
 - **Guidance derived from demonstrations of integration of Fire/Medical response to mass casualties.**



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- **Specific Lessons Learned and Issues Addressed**
 - **Alternate Emergency Response Facilities (ERFs)**
 - **Rev 1 recognizes opportunity to demonstrate activation of alternate ERFs to more realistically simulate ERO response to a hostile action event**
 - **Pre-Drill Tabletops**
 - **Recognized as an industry good practice**
 - **New section and appendix added to provide guidance on conducting tabletops**
 - **Public Information**
 - **Added a functional demonstration to coordinate the release of public information with new stakeholders**



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- **What's Next??**

- **Approximately 30 Phase 3 Drills Scheduled for 2008**

- **Repeat the process: observations, lessons learned, more refinement of the guidance**

- **25+ Drills scheduled in 2009**

- **The Future**

- **Develop guidance for exercise demonstration of hostile action based drills by 2009**

- **NRC / FEMA Rulemaking**

- **Request for NRC and FEMA Endorsement**

- **Incorporate Hostile Action Based Drills into Exercise Programs beginning 2010.**



NEI Support Activities

- **Workshop on the revised guidelines**
- **NRC Public Meeting**
- **Support licensees and their offsite organizations in preparation for drills**
- **Interface with NRC and FEMA**
- **Participate in conferences and workshops**
 - **National REP Conference**
 - **Regional Workshops upon request**
 - **NEI EP Forum**

CONTACT INFORMATION

Sue Perkins-Grew

Sr. Project Manager

Nuclear Energy Institute

phone: 603.773.7278

mobile: 202.247.8163

email: spg@nei.org

