

1 Whitepaper: Request for Change to FAQ 411 Determination

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3 Emergency Preparedness Performance Indicators

4 EP01, Drill/Exercise Performance

5 EP02, Drill Participation

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7 This whitepaper requests the NEI Reactor Oversight Process (ROP) Committee to
8 engage in discussion with the Nuclear Regulatory Commission in an effort to change
9 the current guidance regarding FAQ 411 to include the qualification drill/exercise (EP01)
10 performance enhancing experiences of Key ERO members.

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12 Relevant FAQ 411 background:

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14 FAQ 411

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16 Question

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18 If a licensee were to wait until the ERO assignment process was completed before
19 crediting the DEP performance indicator for an ERO-member-in-training, then the
20 opportunity could be counted in a reporting period other than the one in which the
21 performance enhancing experience occurred. At North Anna, a performance enhancing
22 experience was provided to new ERO member before they assumed their ERO position.
23 The ERO member assumed their ERO position one day later; however, that day
24 spanned reporting periods.

25 Question: How and when should DEP PI opportunities for ERO-members-in-training be
26 counted?

27 Response

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29 PI opportunities and participation credit should not be counted for ERO-members-in-
30 training. DEP opportunities are only counted for plant staff members who are currently
31 assigned to fill a key position on the ERO.

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33 Background:

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35 NEI 99-02, page 79, Line 31 states "The percentage of drill, exercise, and actual
36 opportunities that were performed timely and accurately by Key Positions, as defined in
37 the ERO Drill Participation indicator,

38 NEI 99-02, page 86, Line 11 states, "...ERO members assigned to fill Key Positions
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40 Discussion:

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42 The participation PI tracks Key ERO members assigned to the ERO. The key word here
43 is assigned. Trainees are not assigned to the ERO and therefore DEP opportunities or
44 participation does not count.

45 Data reporting may be affected in accordance with this FAQ at some plants. There is no
46 need to modify past record keeping practices based on this FAQ. Record keeping
47 practices should only be modified...

48 **Requested Whitepaper Resolution**

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50 If a Key ERO member trainee participates in a performance enhancing experience as
51 part of the qualification process, then the licensee may count the trainee's performance,
52 (success or failure) in the Drill/Exercise PI (EP01) for the quarter in which the
53 opportunity occurred. All trainee EP01 performance enhancing experiences must be
54 determined in advance in accordance with NEI 99-02 clarifying notes.

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56 If the trainee performance is counted as a success, then they may be assigned to the
57 ERO. If the trainee performance is a failure, then they may undergo remediation prior to
58 assignment to the ERO. If a performance enhancing experience is required for
59 remediation, it may or may not be included in the EP01 PI, as described above. In
60 either case, when the trainee is actually assigned to the ERO, then all their EP 01
61 performance enhancing opportunities, whether a success or failure are included in the
62 EP01 metric in that quarter. For EP02, the trainee's most recent participation in a
63 performance enhancing experience that was included in the EP01 PI, whether during
64 qualification or remediation, would apply.

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66 NEI 99-02 Revision 5 Changes:

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68 NEI 99-02 Revision 5, page 43, Line 31 defines EP01 as "The percentage of all drill,
69 exercise, and actual opportunities that were performed timely and accurately by Key
70 Positions, as defined in the ERO Drill Participation indicator, during the previous eight
71 quarters."

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73 NEI 99-02 Revision 5, page 51, Line 3 identifies the purpose of EP02, "This indicator
74 tracks the participation of ERO members assigned to fill Key Positions in performance
75 enhancing experiences and through linkage to the DEP indicator ensures that the risk
76 significant aspects of classification, notification, and PAR development are evaluated
77 and included in the PI process. This indicator measures the percentage of ERO
78 members assigned to fill Key Positions who have participated recently in performance-
79 enhancing experiences such as drills, exercises, or in an actual event."

80
81 NEI 99-02 Revision 5, page 51, Line 11 defines EP02 as "The percentage of ERO
82 members assigned to fill Key Positions that have participated in a drill, exercise, or
83 actual event during the previous eight quarters, as measured on the last calendar day of
84 the quarter."

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86 NEI 99-02 Revision 5, page 51, Line 18 identifies the data reporting elements as
87 • total number of ERO members assigned to fill Key Positions
88 • total number of ERO members assigned to fill Key Positions that have participated in
89 a drill, exercise, or actual event in the previous eight quarters

90
91 NEI 99-02 Revision 5, page 52, Line 24 provides Clarifying Notes," When the
92 performance of ***ERO members assigned to fill*** Key Positions includes classification,
93 notification, or PAR development opportunities, the success rate of these opportunities
94 must contribute to Drill/Exercise Performance (DEP) for participation of those Key
95 Positions to contribute to ERO Drill Participation." ***When a performance enhancing***

96 ***experience occurs prior to an ERO member being assigned to a Key Position in***
97 ***the ERO (qualifying drill), then the classification, notification, or PAR***
98 ***development success rate shall contribute to the Drill/Exercise (DEP) at the time***
99 ***the member is assigned to the ERO. Drill Participation credit will be the ERO***
100 ***members most recent participation in a performance enhancing experience that***
101 ***was included in the EP01 PI.***

102
103 Application of this resolution and revision to NEI 99-02 would ensure that the
104 performance, positive or negative, of all ERO members assigned to fill Key Positions is
105 actually reflected in the EP01 PI. It would provide a fuller indication of the state of
106 proficiency of the ERO members assigned to fill Key Positions. It would also prevent
107 deferral of performance enhancing experiences from incumbent ERO members
108 assigned to fill Key Positions to newly-qualified ERO members assigned to fill Key
109 Positions.

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111 Revision to NEI 99-02 Revision 5

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113 NEI 99-02 Revision 5, page 53, insert at Line 48 “Drills performed by an individual
114 before being assigned to a Key Position in the ERO may be counted once the individual
115 is assigned to the ERO as long as the performance enhancing experience(s)
116 contributes to the Drill/Exercise (DEP) metric.”

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118 NEI 99-02 Revision 5, page 45 insert at Line 39 “When a performance enhancing
119 experience occurs before an individual is assigned to a Key Position in the ERO, then
120 opportunities for that individual that were identified in advance shall contribute to the
121 Drill/Exercise (DEP) metric at the time the member is assigned to the ERO”.

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