

Citation	Explanation of Change(s)
	<p>(E) = Change deemed to be editorial or format related. Although care was taken in making editorial changes, there remains a possibility that meaning may have been inadvertently caused a “technical” change.</p> <p>(T) = Change deemed to alter technical content. Technical changes do not necessarily represent changes in policy; some reflect experience in enforcement actions to date. Sections with significant new content are highlighted in red.</p> <p>[new] = a new section [old X.X] = back link to old section number</p> <p>Note that addition of a new section “Entry Conditions and General Instructions” as Section 3.0, forced re-numbering of subsequent sections. Failure to Implement is now addressed in Section 4.0; Failure to Comply in Section 5.0; Corrective actions in Section 6</p>
Table of Contents	(E) Added a table of contents in the interest of accessibility
Entire Document	<p>(E) An effort was made to improve the accessibility of the information contained within the Appendix. These changes were largely editorial and formatting. Typical changes made in this regard:</p> <ul style="list-style-type: none"> • Attempt was made to make use of terminology consistent throughout document, e.g., issue vs finding vs problem vs deficiency to minimize confusion and mis-interpretation. • Used block format on the individual planning standard discussions, each starting on a fresh page, in the Failure to Comply section to improve accessibility • Implemented matrix format for PS examples for most of the PS. The exceptions were those PS that have only 2-3 examples and which could be displayed in a table on the PS discussion page. • Matrix table, where possible, aligns examples against the relevant PS function (when there is more than one function). • Although capitalized phrases were retained, an effort was made to reduce the amount of such highlighting to improve readability (e.g., re-arrange text slightly to avoid the need to repeat a capitalized phrase in the same or adjacent sentences). • Used lists in lieu of lengthy, multi-part sentences and paragraphs where possible to improve readability. • Reduced definitions to the fundamental definition; moved clarifications and implementation details to elsewhere in the text. • In text, shortened “<i>FAILURE TO COMPLY with a REGULATORY REQUIREMENT</i>” to “<i>FAILURE TO COMPLY</i>” since the definition of FAILURE TO COMPLY already includes the phrase “<i>with a REGULATORY REQUIREMENT.</i>” • In the sections on Failure to Comply and Failure to Implement, re-structured text in a stepwise procedure format. • Added a section title “<i>Entry Condition and General</i>

Citation	Explanation of Change(s)
Entire Document (con't)	<p><i>Instructions</i>”to provide an entry point that directs users to the appropriate section given the finding.</p> <ul style="list-style-type: none"> • Added “<i>Key ERO member functions</i>” list to those PS that reference these people. • Relocated text from “<i>general</i>” sections to the specific section it is relevant to. • Added logic charts for critique issue significance and failure to correct a weakness significance. • Simplified Sheets A and B by reversing sequence from green-to-worst to worst-to-green. • Used “<i>E-plan</i>” throughout to refer to emergency plan, etc. Used “<i>actual radiological event</i>” throughout in lieu of “<i>actual accident,</i>” “<i>actual event,</i>” etc. • In discussions regarding exercise/actual event performance, used the phrase “ERO performance” to distinguish from EP staff performance issues.
Section 1	<p>(T) Added footnote to exclude ORO performance deficiencies from the EP SDP, even in cases where licensee is responsible for offsite plans. This is a lesson-learned from daycare debacle.</p> <p>(E) Re-structured Section 1 to provide overview of EP-SDP as training for people new to the EP SDP. Also, attempt to show linkage of the various defined terms (the alphabetical sequence of definitions hides this linkage).</p> <p>(E) Moved Regulatory Guide 1.101 discussion from original “<i>General Guidance</i>” section, as it logically falls in this discussion of regulatory documents.</p> <p>(E) Did not capitalize defined phrases in this introduction section for clarity and since the terms are not defined until the next section.</p>
Section 2	<p>(E) The title was changed to delete reference to “<i>General Guidance,</i>” as that section is no longer necessary due to other changes (e.g., moving the guidance to the relevant specific discussion. Deleted headers 2.1 and 2.2.</p> <p>(E) Omitted the definition of PS and RSPS from the top of Section 2 as it is defined in the definition list and discussed in Section 1.0.</p> <p>(E) Added “<i>defined for purpose of the EP SDP</i>” to start of this section to eliminate the need to repeat it elsewhere in definitions.</p> <p>Specific definition changes discussed below:</p>

Citation	Explanation of Change(s)
Section 2, "Critique"	(E) restructured to emphasize ERO performance and reflect requirement that weaknesses be captured in corrective action program.
Section 2, "Critique Problem"	(T) Omitted the definition for "CRITIQUE PROBLEM," and used the phrase "CRITIQUE Issue" instead in the text. ("CRITIQUE" is already defined and "Issue" is defined in MC0612.) Deemed there was no need for a specific definition—one less capitalized phrase to improve legibility.
Section 2, "Degradation of RSPS Function"	(E) Reduced to fundamental definition. No need for cross-references.
Section 2, "Failure to Comply"	(T) Re-structured to include phrase "where the cause was reasonably within the licensee's ability to foresee and correct and which should have been prevented," since this clause is integral to a performance deficiency being a failure to comply. (E) Added text to distinguish from phrase "failure to implement" in the interest of clarity
Section 2, "Failure to Implement"	(E) Since "Failure to Comply" definition includes "with a regulatory requirement," deleted the redundant text. (E) Added text to distinguish from phrase "Failure to Comply" in the interest of clarity.
Section 2, "Full Scale Drill or Exercise"	(T) Added phrase "major portion of the PS Functions" since this is part of regulatory definition of full scale. (E) Restructured for clarity.
Section 2, "Inspection Cycle"	(T) Re-worded to clarify which exercise is inclusive with definition.
Section 2, "Loss of PS Function"	(E) Replaced "available for emergency response" with "would not be accomplished if a radiological emergency were to occur," in the interest of clarity. Not clear what "available for emergency response" means. Original last sentence was deemed to be redundant.
Section 2, "Planning Standards"	(T) Added definition to serve as lead in to Planning Standard Function.
Section 2.0, "Planning Standard Function"	(T) Reworked definition to emphasize that the planning standard functions are established as a significance determination tool. (T) Also, added text to point out that language of the planning standards generally requires that certain response capabilities are in place, but that the PS functions don't necessarily call for action during an emergency.
Section 2.0, "Program Elements"	(E) Deleted reference to 10 CFR 50.47 as it is already subsumed by the defined term "planning standard."

Citation	Explanation of Change(s)
Section 2.0, "Regulatory Requirement"	(E) Deleted reference to 10 CFR 50.47 as it is already subsumed by the defined term "planning standard."
Section 2.0, "Time of Discovery"	(E) Change " <i>problem</i> " to " <i>condition</i> " in the first sentence as " <i>condition</i> " is more inclusive. Reverse the order of the middle and end of the definition.
Section 2.0, "Weakness"	(E) Reduced to fundamental definition. Guidance on implementation is given elsewhere in EP SDP. (E) change "performance" to read "ERO performance" for clarity since exercises evaluate ERO performance.
[Section 2.2]	(E) This section was deleted. Original (a) was moved to Section 1.0. The content of (b) was relocated to the two sections that address Failure to Comply and Failure to Implement. Also, new Section 3 provides link to these two sections. Text in (c) moved to Section 1.0. Text in (d) is in other sections. First paragraph of (e) is a footnote on page B-6. Second paragraph of (e) is discussed in Section 1.0 and new Section 3.0. The text in (f) was moved to Section 5.0.2(a) to which the text is relevant.
Section 3.0 [new]	(E) This section is new with this revision and was added to provide an entry point to this procedure.
Section 3.1 [new]	(E) Added to provide entry conditions for the EP-SDP. Paragraphs (a) and (b) are from MC0609 and are presented here for user convenience. (T) Discussion on § 50.54(q) added to clarify ROP versus traditional enforcement treatment. Section was added in response to internal and external confusion regarding differences in the treatment of two related findings from Calvert Cliffs. (T) Paragraph (c) was added to address situations experienced in Region 1.
Section 3.2 [new]	(E) Added to provide path to the two analysis branches in the EP SDP.
Section 4.1 [old 3.1]	(E) Change " <i>performance</i> " to read " <i>ERO performance</i> " to focus on ERO performance deficiencies during a failure to implement. (E) Re-structured text to reduce redundancy and improve clarity. Some text moved to other subsections of this Section.

Citation	Explanation of Change(s)
Section 4.2 [old 3.2]	<p>(E) Relocated text that constitutes “<i>criteria</i>” to this section.</p> <p>(T) Added (d) to provide guidance based on experiences in some Region 1 events (Millstone, Salem).</p> <p>(T) Added (e) to provide guidance on how to handle misclassifications during an actual event.</p> <p>(T) Added (f) to provide guidance on over-classifications.</p>
Section 4.3 [old 3.3]	<p>(E) This replacement section provides step-by-step instructions for assessing a failure to implement. Steps crafted from original text in Appendix.</p> <p>(T) Step (d) provides new guidance for over-classifications.</p>
Section 5.0 [old 4.0]	<p>(E) Sections 5.0.1, 5.0.2, 5.0.3 added to provide background, criteria, procedure in a parallel structure to Sections 4.1, 4.2, 4.3. (Used “5.0.x series” to allow sections addressing the planning standards to be numbered by the 50.47(b) designations: 5.1 == 50.47(b)(1))</p>
Section 5.0.1 [new]	<p>(E) Largely a re-structuring of the previous text for clarity.</p> <p>(E) Added examples of conditions which would allow a LOSS OF RSPS FUNCTION to be treated as a DEGRADED RSPS FUNCTION.</p>
Section 5.0.2 [new]	<p>(T) (c) and (d) Added new guidance on compensatory measures in assessing significance or compliance.</p> <p>(E) Paragraphs (a) and (b) carried over from the original Section 2.2.</p>
Section 5.0.3 [new]	<p>(E) This replacement section provides step-by-step instructions for assessing a failure to comply. Steps crafted from original text of Appendix.</p> <p>(T) (c) Provides largely new guidance on how examples are to be treated.</p>

Citation	Explanation of Change(s)
Sections 5.1-5.16 [old 4.1-4.16]	<p>(E) Each planning standard starts on a fresh page to facilitate accessibility.</p> <p>(E) Planning standard text is included verbatim from 50.47(b).</p> <p>(E) Used a block format to facilitate accessibility.</p> <p>(E) For many of the PSs, added new additional guidance where available.</p> <p>(E) For PS with a limited number of examples, the examples are shown as a table on the same page as the PS, PS Functions, supporting requirements, and Informing criteria.</p> <p>(E) For PS with a large number of examples, the examples are arranged in a matrix of PS Function versus finding significance. Done to facilitate comparing examples from finding significance to finding significance.</p> <p>(E) In many of the examples, changed the verb tense from present tense (“is,” “are,” “will”) to future tense (“would,” “could”) where appropriate to reflect the qualitative predictive nature of most of the significance examples.</p> <p>(E) Added cross-reference to new guidance on compensatory measures in Section 5.0.2 to those sections that have examples citing compensatory measures.</p> <p>(E) Prefaced “compensatory measures” with “viable” for consistency with discussion in Section 5.0.2 (d)</p> <p><u>Note</u>: Most of technical content of the 16 sections is unchanged. Only those sections that were changed significantly are listed below.</p>
Section 5.2 [old 4.2]	(T) Added table of Key ERO member functions. The content is from the NEI PI guidance document 99-02.

Citation	Explanation of Change(s)
Section 5.4 [old 4.4]	<p>(T) Added Revision 2 to NUMARC-007, Revision 4 to NEI 99-01 and EPPOS-1 to informing criteria.</p> <p>(T) Substantial changes to significance examples to replace the “counting” approach with an approach that is consistent with the current practice in assessing EAL findings of allowing credit for redundant EALs that allow a classification to be made (1) even if delayed, and (2) when there would be no delay. This protocol has the effect of:</p> <ul style="list-style-type: none"> • A finding related to an NOUE will not rise above a green finding (as is the current case) • A finding related to an Alert will not rise above a white finding (could go Yellow in previous scheme) but only one Alert would be necessary (rather than the present two) • Reducing the threshold for a Yellow finding to one SAE (rather than the present two) • Neither a SAE or GE EAL finding would rise above a green if redundant EALs allowed a timely declaration <p>(T) Clarified desired emphasis on process issues through use of the phrase “<i>has been rendered ineffective,</i>” and defining that phase to include changes to facility procedures, systems, equipment, errors in numeric thresholds, or any other cause, but discounting OOS instruments if timely corrective actions are being taken, and discounting findings caused by improper review or value to obtain prior approval.</p> <p>(T) Added additional guidance text addressing EAL changes that are DIES, over-classification, considering existing redundant instrumentation, parallel EALs when evaluating issues related to missing instrumentation, etc.</p> <p>(T) Added two new examples to address over-classification issues. Text was added to the “Additional Guidance” to address this.</p>

Citation	Explanation of Change(s)
<p>Section 5.5 [old 4.5]</p> <p>Section 5.5 [old 4.5] (Con't)</p>	<p>(T) Added text to explain role of FEMA ANS design report in assessing ANS issues and the need to consult with FEMA on these issues.</p> <p>(T) Added text to address the issue of compensatory measures as a means of mitigating the significance (or non-compliance) of certain findings. This text was added to address issues that have arisen in inspections.</p> <p>(T) Combined two current notification Yellow examples and used the lead-in "<i>notification processes</i>" to focus on the process rather than the existing focus on procedure or system problems. Also, created a new parallel example for the White finding; the difference being an inability to initiate the notification within 15 minutes (Yellow) and complete notification of all cognizant OROs within 15 minutes (White).</p> <p>(T) Using existing loss of capability to notify public White example, developed a parallel example for Green; the difference being whether or not compensatory measures can be completed within 45 minutes.</p> <p>(T) Added guidance text to clarify that the loss of capability to notify the public is based on the licensee's failure to comply with the ANS design report commitments and that the SDP should not be used to resolve concerns regarding the adequacy of the ANS design (i.e., FEMA's purview).</p> <p>(E) Expanded list of citations to case law that addressed ANS issues during licensing as "Additional Guidance."</p> <p>(E) Deleted reference to EPPOS-2.</p> <p>(E) Used "ANS" abbreviation where possible.</p>
<p>Section 5.6 [old 4.6]</p>	<p>(T) Added "<i>including backup facilities</i>" phrase to example identifying "<i>TSC, EOF, or Control Room</i>" for consistency b5b (and future rule).</p> <p>(E) Added table of Key ERO member functions to "<i>Additional Guidance.</i>"</p> <p>(E) Split out the repetitive text that started "<i>In the event...</i>" from examples and made into a single footnote.</p>

Citation	Explanation of Change(s)
Section 5.9 [old 4.9]	<p>(T) Upgraded dose projection examples to place emphasis on dose assessment process capability that precludes timely and accurate PARs as a result of systematic deficiencies. Where the prior examples focused on hardware or analytical issues, the new examples would also envelope deficiencies in user procedures and user training.</p> <p>(T) Eliminated example that incorporated “RG 1.3 or 1.4” since it is subsumed in the new examples and that the citation to RG 1.3 or 1.4 was technically inappropriate.</p>
Section 5.10 [old 4.10]	(E) Added reference to several generic communications on PAs.
Section 5.14 [old 4.14]	(E) Added pointers to sections on critique problems and corrective actions.
[old 4.14.1]	(E) due to format change, this header no longer needed.
Section 5.14.1 [old 4.14.2]	<p>(T) Added new guidance on controller coaching or prompting.</p> <p>(T) Expressed the significance logic in a flow chart, replacing several paragraphs.</p> <p>(E) Divided the text into 5.14.1.1 “Background,” 5.14.1.2 “Criteria,” and 5.14.1.3 “Considerations,” in order to improve retrievability; clarity.</p> <p>(E) Move two “<i>Philosophy</i>” paragraphs from old Section 5.0 since they were a better fit here in 5.14.1.1.</p> <p>(E) Added examples of findings that are weaknesses even if the DEP PI was an opportunity success.</p>
Section 5.15 [old 4.15]	(E) Added table of Key ERO member functions. The content is from a similar NEI PI guidance document 99-02.
Section 6.0 [old 5.0]	<p>(T) Changed title to clarify that this guidance is applicable to corrective actions for exercise weaknesses. Added paragraph to this extent in Section 6.1.</p> <p>(T) Expressed significance logic in a flow chart, replacing several paragraphs</p> <p>(T) Provided additional guidance for inspector considering a finding recurrence (Section 6.3.2).</p> <p>(E) Restructured text to better distinguish between criteria and considerations.</p>
Sheet 1	(E) By re-arranging sequence of decisions, simplified decision chart without changing the functional outcomes.
Sheet 2	(E) By re-arranging sequence of decisions, simplified decision chart without changing the functional outcomes.