

NRC INSPECTION MANUAL

PERB

INSPECTION PROCEDURE 82701

OPERATIONAL STATUS OF THE EMERGENCY PREPAREDNESS PROGRAM

PROGRAM APPLICABILITY: 2515

SALP FUNCTIONAL AREA: PLANT SUPPORT (PLTSUP)

82701-01 INSPECTION OBJECTIVES

01.01 To determine whether the licensee's emergency preparedness program is maintained in a state of operational readiness.

01.02 To determine whether changes to the licensee's emergency preparedness program since the last inspection meet commitments, NRC requirements, and affect the licensee's overall state of emergency preparedness.

82701-02 INSPECTION REQUIREMENTS

02.01 Emergency Plan and Implementing Procedures

- a. If significant or major changes have been made to the emergency preparedness program, assess whether these changes have adversely affected the licensee's overall state of emergency preparedness and have been appropriately incorporated into the licensee's emergency plan and implementing procedures.
- b. Verify that major or significant changes to the emergency plan and implementing procedures have been reviewed, approved, and distributed in accordance with approved licensee procedures and NRC requirements before implementation.

02.02 Emergency Facilities, Equipment, Instrumentation, and Supplies

- a. Determine whether key facilities and equipment are adequately maintained and determine whether changes made since the last inspection are technically adequate, meet NRC requirements, licensee commitments, and are appropriately incorporated into the emergency plan and implementing procedures. Include licensee offsite communication circuits in this determina-

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- b. Determine whether changes to emergency facilities, equipment, instrumentation, and supplies have adversely affected the licensee's emergency preparedness program.

02.03 Organization and Management Control. If changes have been made to the emergency organization or management control systems, determine the effect of these changes on the licensee's emergency preparedness program and verify that these changes have been properly incorporated into the emergency plan and implementing procedures.

02.04 Training

- a. Interview a small sample of individuals assigned key roles for emergency response to determine whether they have been trained as required and understand their emergency assignments, responsibilities, authorities, and changes to the implementing procedures.
- b. If changes have been made to the licensee's emergency preparedness program since the last inspection, determine whether responsible personnel are aware of the changes, understand them, and have been adequately trained to implement them.

02.05 Independent and Internal Reviews and Audits

- a. Examine independent and internal review and audit reports for the licensee's emergency preparedness programs since the last inspection to determine compliance with NRC requirements and licensee commitments.
- b. Evaluate the licensee's corrective actions for audit identified deficiencies and those identified during drills and exercises.

02.06 Effectiveness of Licensee Controls

- a. Evaluate the effectiveness of the licensee's controls in identifying, resolving and preventing problems by reviewing such areas as corrective action systems, root cause analyses, safety committees, and self assessment in the area of emergency preparedness.
- b. Determine whether there are strengths or weaknesses in the licensee's controls for the identification and resolution of the reviewed issues that could enhance or degrade plant operations or safety.

02.07 Public Meeting. Conduct a public meeting following the exit meeting with the licensee if the staff has determined that a significant breakdown of the emergency preparedness program has occurred or there is strong public interest.

82701-03 INSPECTION GUIDANCE

General Guidance

Evaluations conducted in accordance with this procedure are limited to the staff, activities, records, and facilities of the licensee.

Where necessary to verify licensee performance, concerning interactions with organizations and persons involved in offsite emergency preparedness, these activities are limited to reviews of pertinent records available through the licensee. If additional information is needed about offsite emergency preparedness, it can be obtained from FEMA.

Specific Guidance

03.01 Emergency and Implementing Procedures

- a. An assessment of all changes that may substantively impact the emergency plan, since the last inspection, may be accomplished by reviewing the bases for licensee evaluations of these changes on program effectiveness and discussing them with licensee management. A review of the implementing procedures will indicate whether these changes have been appropriately incorporated. Professional judgement must be exercised to determine the impact of specified changes on the overall state of emergency preparedness.
- b. Requirements for changes to emergency plan and implementing procedures are found in 10 CFR 50.54(q) and 10 CFR 50, Appendix E. Requirements for procedural controls are found in the Technical Specifications and relevant administrative procedures. This assessment includes, but is not limited to, careful examination of the following:
 1. Whether changes considered to decrease the effectiveness of the approved emergency plan were implemented before NRC review and approval.
 2. Whether temporary changes were made permanent or cancelled in accordance with approved procedures that govern such changes.
 3. Whether all changes were submitted to NRC within 30 days after the changes were made.
 4. Whether signatures on actual concurrence sheets are consistent with those required for concurrence.
 5. Whether changes were reflected as appropriate in other station procedures.
 6. Whether current copies of the emergency plan and implementing procedures are readily available in the Emergency Response Facilities (ERFs) and control room.
 7. Licensee distribution lists should indicate whether appropriate personnel and organizations were sent copies of changes to the emergency plan and implementing procedures. Discussions with a small sample of key

licensee emergency response personnel and a review of the distribution lists will confirm whether copies of changes to the emergency plan and implementing procedures were dispatched and received in a timely manner.

03.02 Emergency Facilities, Equipment, Instrumentation and Supplies. Requirements for emergency facilities, equipment and supplies are found in 10 CFR 50.47(b), 10 CFR 50, Appendix E, Technical Specifications, NUREG-0737 and Supplement 1 to NUREG-0737.

- a. Essential emergency facilities, equipment, instrumentation, and supplies should be maintained in a state of operational readiness by the licensee. Determination of their status may be accomplished by discussion with cognizant licensee personnel and direct observation of the ERFs and a small, representative sample of other essential facilities, equipment, instrumentation and supplies. It is important to verify that any changes in this area meet NRC requirements and licensee commitments and are appropriately incorporated into the emergency plan and implementing procedures. This assessment includes, but is not limited to the following:
 1. The operational readiness of the ERFs and changes that modify their effectiveness or timely activation. Such changes may include, but are not limited to, changes in size, location, physical facilities, supplies, internal arrangements, and use during normal operations. ERFs include the Operational Support Center, Technical Support Center, and Emergency Operations Facility. The status of emergency preparedness equipment, instrumentation and supplies in the control room can be determined by direct observation.
 2. Technical adequacy, operability (if applicable), and maintenance of facilities, equipment, instrumentation, and supplies used in emergency response that are not part of the ERFs. Careful examination of communications equipment, in-plant and onsite radiological survey equipment, data acquisition systems, testing of ERF's air cleaning systems, and emergency kits is important. Changes made to licensee offsite communication circuit(s) should be evaluated for the effect of those changes on the ability of the circuit(s) to survive or recover from a severe natural disaster or fire. Offsite communication circuit recovery plan(s) and onsite repair support for these circuits should be included in this review.
- b. Professional judgement must be exercised to determine the impact of specified changes on the licensee's emergency preparedness program.

03.03 Organization and Management Control. Discussions with cognizant licensee management and the review of relative documentation, are methods to determine whether changes have been made to the licensee's emergency organization or management control systems. If changes have been made, professional judgement must be

exercised to determine the effect of these changes on the licensee's overall emergency preparedness program. Reviewing relevant portions of the emergency plan and implementing procedures is a way to verify that all changes are included. Changes that can adversely impact the administration or management of the licensee's routine and overall emergency preparedness program, include changes in organizational structure; responsibilities, authorities and staffing of key emergency response personnel; interfaces and coordination between onsite, offsite, and corporate organizations; and shift staffing. Such changes include, but are not limited to, the following:

- a. Changes in the duties assigned to the Emergency Planning Coordinator. This may include changes in the reporting chain, assignment of additional responsibilities outside the emergency preparedness area, or actual reassignment of the Emergency Preparedness Coordinator's functional responsibilities to another individual. Such changes may not be reflected in the implementing procedures, but are normally obtainable by examining the organizational or administrative procedures and by interviewing licensee personnel.
- b. Reorganization involving either the corporate or plant staffs that may result in some areas of the emergency organization functional responsibilities not being covered by an assigned individual or a loss of alternate or backup functions.
- c. Assignment and qualifications of individuals new to the emergency organization. A review of the training and qualification records of individuals assigned functional responsibilities in the emergency organization since the last inspection, will indicate whether the individual(s) completed all training requirements before the new assignment and are qualified to fulfill the newly assigned responsibilities.
- d. Changes in key offsite support personnel or methods of coordination with them. This information is normally obtained from the licensee or from the FEMA RAC Chairman).
- e. Changes in personnel availability which may impact augmentation of the emergency organization (e.g. personnel moves further from the plant).
- f. Changes in agreements with offsite support organizations.

03.04 Training

- a. Requirements for training are found in 10 CFR 50.47(b)(15) and 10 CFR 50, Appendix E, Item IV.F. It is important to interview the Emergency Coordinator, Emergency Directors in the ERFs, the Shift Supervisor, and selected individuals involved in the notification process. As part of the interview process, a walk-through with the shift crew, including the Shift Supervisor and Shift Technical Advisor, on one or more shifts (as necessary to assess training effectiveness rather than individual performance), is

required. It is essential that this be done with minimal interference with normal operations. Duplication of any areas inspected in the Reactor Operator Licensing Program is not to be done, unless weaknesses in emergency response were identified in the examination report from the facility's previous qualification or requalification exams. During the walk-through, responsible licensee emergency response staff and management, as appropriate should be able to (1) evaluate hypothetical conditions or data them, (2) identify respective emergency action levels, (3) evaluate or, where appropriate, perform dose calculations (4) classify the emergency using the latest procedures, and (5) recommend appropriate protective actions. Where weaknesses are identified during the reactor operator qualification or requalification exams or during the annual emergency preparedness exercise, and additional inspection is required, followup inspection can be performed under Inspection Procedure 82206, "Knowledge and Performance of Duties," as a regional initiative.

1. The licensee should use the correct procedures and demonstrate proficiency during each step in the classification and notification processes. Classifications should be correct. Notifications should be made as required. Both classifications and notifications should be done in a timely manner.
 2. For each emergency class, the licensee should demonstrate proficiency for initiating protective actions onsite and recommending those to be taken offsite. Requirements for protective actions are found in 10 CFR 50.47(b)(2).
- b. A small sample of significant changes to the licensee's procedures and equipment can be examined and discussed with responsible personnel to determine whether they are aware of the changes, understand them and have received training appropriate for their use.

03.05 Independent and Internal Reviews and Audits

- a. Independent and internal reviews or audits of the licensee's emergency preparedness program is generally done on a 12 month cycle. Requirements may be found in 10 CFR 50.54(t). The qualifications of the respective audit personnel are normally found in the licensee's QA Manual. Criteria for auditors normally includes training and experience commensurate with the scope, complexity and special nature of the activities being audited. Audit personnel are required to have no direct responsibility for the development or implementation of the emergency preparedness program. Was an audit plan and check list used for the audit? Examination of selected audit reports will indicate whether NRC requirements have been met. Were the scope and depth of the audit comprehensive enough to provide a complete overview of the entire program? Items requiring particular attention are negative findings, improvement items, trends and actual or potential programmatic weaknesses. Negative trends and actual or potential programmatic weaknesses are to be

discussed with licensee management.

- b. The examination of the licensee's corrective action system(s) for four or five of the most serious problems identified by the audits, inspections, enforcement actions, drills, exercises, and LERs are to be selected and reviewed. Does the licensee have a separate system for tracking drill and exercise deficiencies and weaknesses? By a review of the licensee's corrective action system(s), commitments, maintenance logs, work orders and other relevant documentation, and by discussions with responsible personnel and direct observation, it can be determined whether identified problems were reviewed by appropriate management, prioritized commensurate with safety significance, appropriately assigned and whether corrective actions were technically correct and performed in a timely manner.

03.06 Effectiveness of Licensee Controls

- a. When safety issues, events or problems are reviewed, the adequacy of the results of licensee controls may be assessed by determining how effective the licensee was in performing the following:
 1. Initial identification of the problem.
 2. Elevation of problems to the proper level of management for resolution (internal communications and procedures).
 3. Root cause analysis.
 4. Disposition of operability issues.
 5. Implementation of corrective actions.
 6. Expansion of the scope of corrective actions to include applicable related systems, equipment, procedures and personnel actions.
- b. The determination of whether there are strengths or weaknesses in the licensee's controls will be limited to those issues, events, or problems reviewed in detail. The evaluation will not draw sweeping conclusions about the licensee's overall control program but is to be very specific in identifying any licensee strengths or weaknesses with the individual items reviewed.

03.07 Public Meeting. The region should conduct a public meeting if: (1) the preliminary results of the inspection indicate a significant breakdown of the licensee's onsite emergency preparedness program has occurred; or (2) there is strong public interest as demonstrated by past and present communications with members of the public. The identification of three or more exercise weaknesses may be indicative of a significant programmatic breakdown; consideration should be given to the root cause of the weaknesses and the performance record of the licensee in the EP

area. The public meeting should follow the formal exit meeting with the licensee, complying with the ten day notification requirements discussed in IMC 1100.

NOTE: For additional inspection guidance, please refer to Inspection Procedure 40500, "Effectiveness of Licensee Controls in Identifying, Resolving, and Preventing Problems."

82701-04 RESOURCES

The estimated time to complete this procedure is 35 hours of direct onsite inspection effort (when conducting public meetings, add an additional 10 hours).

82701-05 REFERENCES

Memorandum to Office Directors and Regional Administrators from James M. Taylor, Executive Director for Operations, dated February 12, 1966, "Meetings Between NRC Staff and the Public." (NUDOCS 72852/356-357)

Regulatory Guide 1.97, "Instrumentation for Light-Water Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," Revision 3, May 1983 (Microfiche Address: 04393/323-326).

Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 3, August 1992.

NUREG-0396, "Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants," December 1978 (Microfiche Address: 00567/260 - 00568/40).

NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980 (Microfiche Address: 01997/314 - 01998/71).

NUREG-0696, "Functional Criteria for Emergency Response Facilities," February 1981 (Microfiche Address: 08158/270-313).

NUREG-0731, "Guidelines for Utility Management Structure and Technical Resources," September 1980 (Microfiche Address: 06910/234-265).

NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980 (Microfiche Address: 07003/27-284) and Supplement 1, January 1983 (Microfiche Address: 17301/342-363).

EPA-520/1-75-001-A, "Manual of Protective Actions for Nuclear Incidents," January 1990.

ANSI/ANS 3.1-1981, "Selection, Qualification and Training of Personnel for Nuclear Power Plants," (Supersedes ANSI N18.1-1971-77) (Microfiche Address: 65959/199-225).

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