

ERO Drill Participation Credit for Common Facilities



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Basis of ERO Participation PI

- **Measures percentage of Key ERO members who have recently participated in performance-enhancing experiences**
- **Enhances ERO readiness through drill participation**
- **Verifies Key ERO members are practicing in drills to maintain proficiency**

Industry Position on ERO Participation for Common Facilities

- **Common support facilities utilize the same processes to support all sites.**
- **These common processes have generic application and therefore the skill set is similar in application regardless of the nuclear site involved**
- **Participation Credit is warranted for these “generic” key positions for all nuclear sites served by a common facility when a Key Position member is provided a meaningful opportunity to gain proficiency during any one nuclear site drill**

Justification for ERO Participation for Common Facilities

- **Processes are common within the Emergency Plans**
- **All software programs (including dose assessment) are common**
- **PAR processes are the same**
- **There is one notification form for all the applicable sites**
- **Classification schemes are the same**
- **The EOF is made up of the corporate staff with diverse experience**
- **Technology specific advisors respond to the common facility**
- **Site retains responsibility for event classification or peer checks**

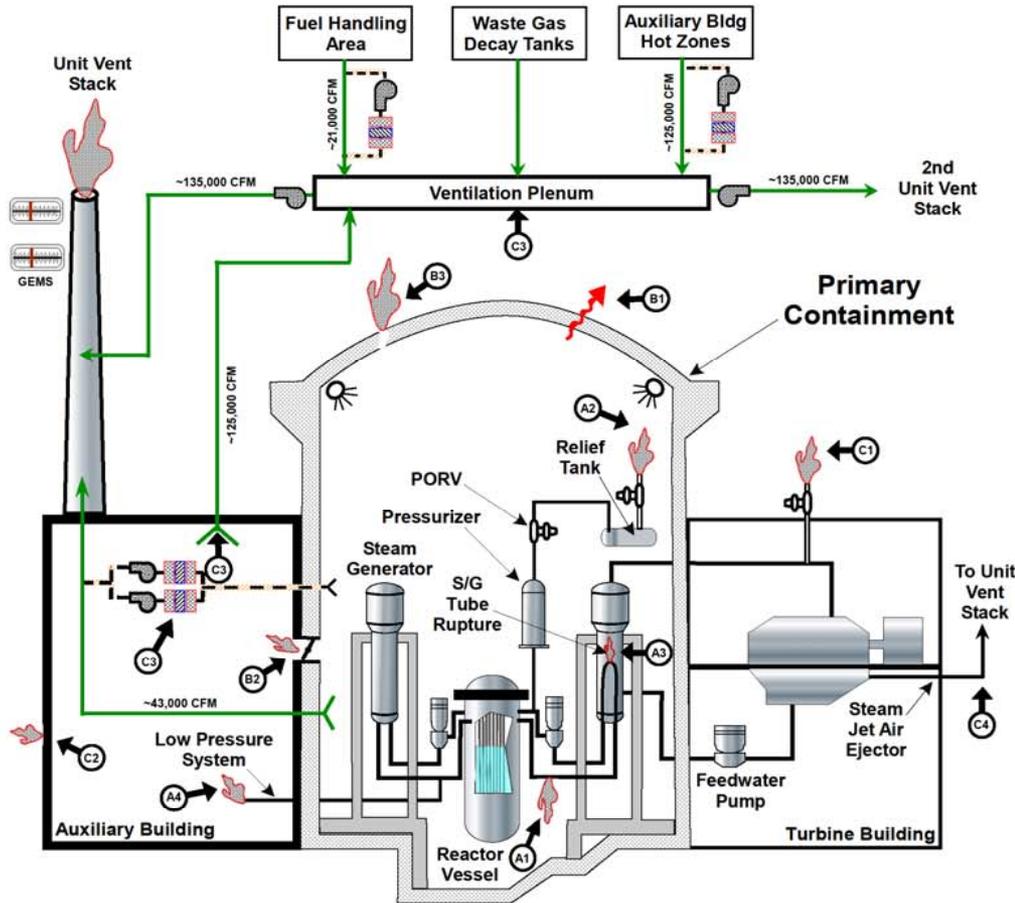
Justification for ERO Participation for Common Facilities

- **The TSC focus is on station response to the event (on site response)**
- **The EOF focus is on protecting the health and safety of the public (off site response)**

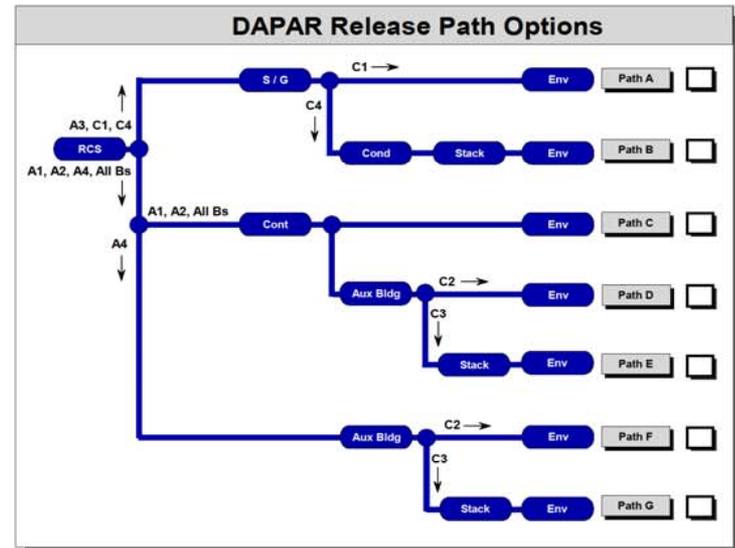
Common Dose Assessment

- **The dose assessment processes, program and training are common**
- **The dose assessment is based on source term, release points (path), radiation monitor readings, and meteorology**
- **Source term is determined by the program based on accident type**
- **Met data and radiation monitoring is readily available in the EOF in a common format**
- **Dose assessment checks are performed at the TSC**
- **Release point information is available for all stations (see next slide example)**

Braidwood Station Release Path Information



Core Conditions				
Core Damage: Clad <input type="checkbox"/> Melt <input type="checkbox"/> Amount: _____ % Shutdown Time: _____ (hrs)				
Component	Reductions			
Containment	Sprays:	On <input type="checkbox"/>	Off <input type="checkbox"/>	
Containment	Hold Up Time:	< 2 hr <input type="checkbox"/>	2-24 hr <input type="checkbox"/>	>24 hr <input type="checkbox"/>
Steam Generator	Boiling:	Solid <input type="checkbox"/>	Dry <input type="checkbox"/>	
Aux Bldg	Hold Up Time:	< 2 hr <input type="checkbox"/>	2-24 hr <input type="checkbox"/>	>24 hr <input type="checkbox"/>
Stack Filters		On <input type="checkbox"/>	Off <input type="checkbox"/>	
Condenser / Air Ejector	No Options			



Legend			
A1 → Leak into Containment	B1 → Containment - Design Leakage	C1 → Steam Generator Relief Valve	
A2 → Pressure Relief Valve	B2 → Containment - Failure to Isolate	C2 → Release Bypassing - Filters	
A3 → Steam Generator Tube Rupture	B3 → Containment - Catastrophic Failure	C3 → Release Through - Filters	
A4 → Bypass Containment		C4 → Release Through Condenser	

Additional Justification

- The practice of giving participation credit for all stations served by a common facility is standard industry practice
- Programs and policies are common and therefore skill set is similar
- Dose assessment processes are common and therefore skill set is similar
- Participation in a drill for multiple sites serviced by a common facility will not add value and will be a significant unnecessary burden for the ERO
- Drill and Exercise critiques and DEP performance have not identified site/unit specific knowledge as a performance issue

Conclusion

- Processes and policies are common resulting in a performance-enhancing experience applicable to all sites serviced by the common facility
- Participation Credit is warranted for the “generic” key positions for all nuclear sites served by a common facility when a Key Position member is provided a meaningful opportunity to gain proficiency during any one nuclear site drill
- Providing common facility PI credit meets the objective of the Participation Performance Indicator
- [NEI 99-02](#) will be revised to further clarify common facility credit