

<p>1. For common credit to be given the processes need to be similar for all the plants serviced by the common EOF – The NRC wants guidance developed for how to define “similar”.</p> <p><u>Revise bullet 2 and 3 to follow similar mindset as the first bullet. Is this a commitment to flow charts? Bullet 1 - Common EOF procedure with common format is used by all the sites. Need to ensure that different unit technologies are addressed. Consider bullet 4 - PAR discussions and protocol - i.e., who talks to who and when - description of interaction when discussion of PARs should be made.</u></p> <p><u>Need to address differing technologies</u></p>	<p>Attributes for similar processes/activities:</p> <p>Processes/activities are similar when the processes/activities are related to each other for the purpose of accomplishing the same task/goal. Examples of similar processes/activities are provided below:</p> <p>Protection Action Recommendations (PARs)</p> <p>Protection Action Recommendations, when developed with the same protective action strategies, are similar provided that the process for the development of the protective action recommendations are the same. For instance the following are examples;</p> <ul style="list-style-type: none"> • Logic flow charts may not be identical but the use of the flow chart is the same. • Protective Action Zones may differ on a site specific basis. • Implementation of KI strategies may differ based on the implementation strategies of responsible authorities at the State and/or Local level. <p>Dose Assessment</p> <p>Dose assessment is similar when methodologies, applicable computer programs, and models are the same across sites <u>and/or technologies</u> served by the common facility. Emergency release definitions <u>are</u> also the same. Training for key ERO members performing this function <u>to</u> include site specific <u>and/or technology</u> differences in effluent monitors and release pathways <u>and how these differences impact the dose assessment.</u></p> <p>Emergency Notifications</p> <p><u>The emergency communicator functions,</u> are similar when <u>common facility procedural</u> protocols are performed utilizing a common <u>procedural process,</u> emergency notification <u>and form content.</u> Emergency notification <u>contacts may differ but the communicator will be trained on method and equipment differences</u> utilized <u>to make notifications.</u></p> <p>Classification</p>
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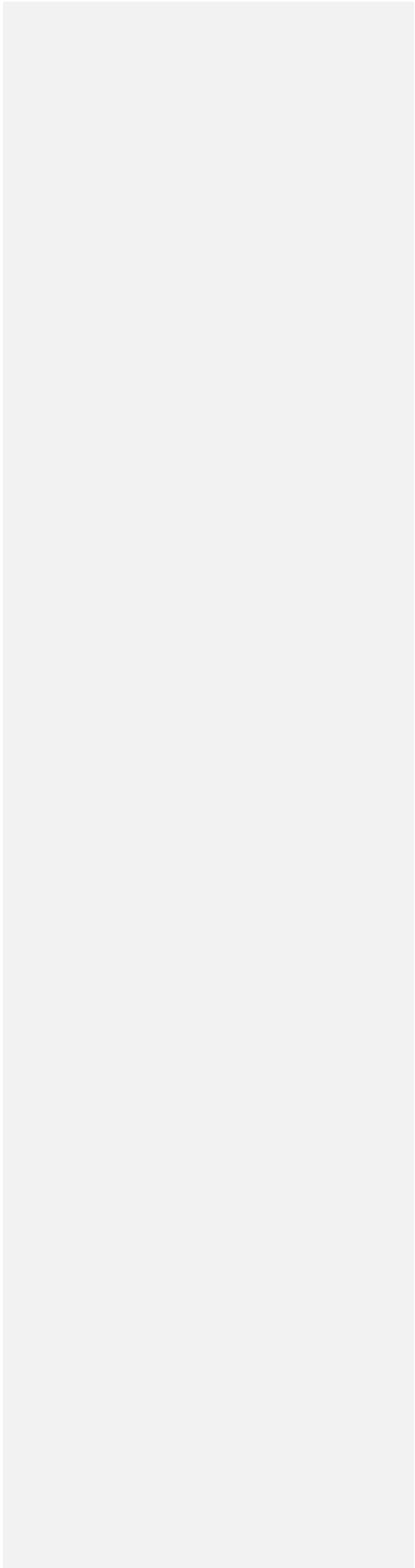
	<p>Emergency Classification processes are similar when <u>the</u> Emergency Action Level, <u>procedural processes</u> are the same for all sites <u>and/or technologies</u> served by the common facility. Training for key ERO members performing this function should include site specific <u>and/or technology</u> differences in Initiating Conditions / Emergency Action Levels for sites served by the common facility (e.g., ISFSI, unique hazards, design considerations, etc.).</p>
<p>2. When common credit is given to a site that is not part of the drill or exercises the NRC wants justification since the NRC only recognizes site licenses not facilities? In other words how do we give a site PI credit for a drill that does not directly involve the site?</p> <p>3. Per the NRC, the PIs for ERO participation credit and DEP are tied together to measure overall performance, for trending, and to facilitate corrective actions.</p> <p>4. <u>With the granting of common credit the DEP opportunities go to the site participating in the drill only while the ERO Participation Credit goes to all the sites breaking the link between the 2 performance indicators.</u></p> <p><u>Consider developing DEP wording that would address the application of DEP opportunity credit across sites serviced by the common facility. Specifically an opportunity performed by a common team in the common facility should be applied (positively or negatively) to all sites serviced by the common facility. This re-establishes the DEP tie to participation for common facilities.</u></p> <p><u>Need to ID which site had the missed opportunity and those sites that did not actually perform the opportunity but is receiving credit for the opportunity performed by another site.</u></p> <p><u>Ensure that wording does not trap common facilities with different EROs not having to accept DEP from another site.</u></p>	<p>Credit for <u>participation</u> may be granted across a fleet or multiple technologies that a common facility <u>ERO</u> serves provided that lessons learned and corrective actions from the performance of key ERO members performing DEP activities are shared with or applied to all key ERO members of all sites served by the common facility through the corrective action program. This approach ensures that participation by key ERO members remains linked with performance for the fleet/multiple technologies while retaining an emphasis on the direct linkage for the specific site and/or technology. Common facility lessons learned (positive and negative) should be shared to ensure that the benefits of the performance enhancing experience of the key ERO member(s) are applied across the fleet and/or technologies served by the common facility. Likewise, any corrective actions associated with common facility Key ERO member performance (e.g. training or qualification gaps, procedure deficiencies, equipment issues) are applied across the fleet and/or technologies served by common facilities.</p>

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Deleted: <#>The ERO drill participation PI linkage to the Drill and Exercise Performance (DEP) PI needs to be maintained.¶

¶ See question number 4.¶

¶ <#>Site specific emergency plans vice corporate emergency plans.¶

¶ The requirements for similarity under question number 1 apply. ¶

¶ <#>Multiple ERO drill participation PI credit is currently allowed by NEI 99-02 for positions with similar skill sets during one exercise. What constitutes a similar skill set for a key ERO position at an EOF that supports multiple sites?¶

¶ See question number 1.¶

¶ <#>How would a procedure change at one site be handled at the other sites? Reading about risk significant procedure changes is not the same as performing a risk significant procedure that has been changed.¶

¶ Not applicable for common procedures. Where a change would represent a loss of similarity credit would not be allowed. Change management regarding procedure changes are applicable to the common EOF. ¶

¶ <#>Consideration for a new key ERO member position at an EOF that supports multiple sites that would act as a special technical advisor for key ERO positions. This individual would know site specific information.¶

¶ Currently the staff at the TSC is in direct communication with the EOF staff. Therefore site specific information if needed is provided by the TSC. This coupled with the use of similar procedures and processes negate the need to an addition EOF position. ¶

¶ <#>Consideration of a documented set of standards for when it would be permissible to award multiple site ERO drill participation PI credit to ensure consistent application in the future.¶

¶ See question number 1. ¶