

EMERGENCY RESPONSE 1 ORGANIZATION DRILL PARTICIPATION

2 Purpose

3 This indicator tracks the participation of ERO members assigned to fill Key Positions in
4 performance enhancing experiences, and through linkage to the DEP indicator ensures that the
5 risk significant aspects of classification, notification, and PAR development are evaluated and
6 included in the PI process. This indicator measures the percentage of ERO members assigned to
7 fill Key Positions who have participated recently in performance-enhancing experiences such as
8 drills, exercises, or in an actual event.

9

10 Indicator Definition

11 The percentage of ERO members assigned to fill Key Positions that have participated in a drill,
12 exercise, or actual event during the previous eight quarters, **as measured on the last calendar**
13 **day of the quarter.**

14

15 Data Reporting Elements

16 The following data are required to calculate this indicator and are reported:

17

18 • total number of ERO members assigned to fill Key Positions

19 • total number of ERO members assigned to fill Key Positions that have participated in a
20 drill, exercise, or actual event in the previous eight quarters

21

22 The indicator is calculated and reported quarterly, based on participation over the previous eight
23 quarters (see clarifying notes)

24

25 Calculation

26 *The participation indicator may include participation in a facility that supports multiple sites or unit*
technologies and is calculated as follows:

27

100

Total number of Key Positions assigned to ERO Members

28 # of ERO members assigned to Key Positions that have participated in drill, exercise or actual event the previous 8 qrts

×

29

30

31 Definition of Terms

32 Key Positions are defined below

33

34 · Control Room

35

36 · Shift Manager (Emergency Director) - Supervision of reactor operations, responsible
37 for classification, notification, and determination of protective action

38 recommendations

39

40 · Shift Communicator - provides initial offsite (state/local) notification

41

42

NEI 99-02 Revision 6

51

1 · Technical Support Center *(Personnel may support multiple unit technologies)*

2

3 · Senior Manager - Management of plant operations/corporate resources

4 · Key Operations Support

5 · Key Radiological Controls - Radiological effluent and environs monitoring,
6 assessment, and dose projections

7 · Key TSC Communicator- provides offsite (state/local) notification

8 · Key Technical Support

9

10 · Emergency Operations Facility *(Personnel may support multiple sites or unit technologies)*

11

12 · Senior Manager - Management of corporate resources

13 · Key Protective Measures - Radiological effluent and environs monitoring,
14 assessment, and dose projections

15 · Key EOF Communicator- provides offsite (state/local) notification

16

17 · Operational Support Center *(Personnel may support multiple unit technologies)*

18

19 · Key OSC Operations Manager

20 · Assigned: Those ERO personnel filling Key Positions listed on the licensee duty roster on the
21 last day of the quarter of the reporting period.

22

23 Clarifying Notes

24 When the performance of Key Positions includes classification, notification, or PAR
25 development opportunities, the success rate of these opportunities must contribute to
26 Drill/Exercise Performance (DEP) statistics for participation of those Key Positions to contribute
27 to ERO Drill Participation. Participation drill credit before being assigned to the ERO may be
28 counted for these Key Positions once the individual is assigned to the ERO as long as the success
29 rate for the opportunities contributes to Drill/Exercise (DEP) statistics.

30

31 The licensee may designate drills as not contributing to DEP and, if the drill provides a
32 performance enhancing experience as described herein, those Key Positions that do not involve
33 classification, notification or PARs may be given credit for ERO Drill Participation.

34 Additionally, the licensee may designate elements of the drills not contributing to DEP (e.g.,
35 classifications will not contribute but notifications will contribute to DEP.) In this case, the

36 participation of all Key Positions, except those associated with the non-contributing elements,
37 may contribute to ERO Drill Participation. Participation drill credit before being assigned to the

38 ERO may be counted for the Key Positions not contributing to DEP if the drill provides a
39 performance enhancing experience as described herein. The licensee must document such

40 designations in advance of drill performance and make these records available for NRC
41 inspection.

42

When common facility key position functions are performed similarly and a performance-enhancing experience occurs, participation credit may be granted for those key positions for all nuclear sites served by the common facility during any one nuclear site drill. A similar approach may be taken for sites with multiple unit technologies. DEP credit may only be provided for opportunities related to the site conducting the drill.

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:

Protection Action Recommendations (PARs)

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:

- 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.

Dose Assessment

Dose assessment is similar when methodologies, applicable computer programs, and models are the same across sites served by the common facility. Emergency release definitions should also be the same. Training for key ERO members performing this function should include site specific differences in effluent monitors and release pathways.

Emergency Notifications

Emergency notifications are similar when protocols are performed utilizing a common emergency notification form and standardized equipment. Emergency notifications contacts may differ, but the methods utilized are the same.

Classification

Emergency Classification processes are similar when Emergency Action Level schemes are the same for all sites served by the common facility. Training for key ERO members performing this function should include site specific differences in Initiating Conditions / Emergency Action Levels for sites served by the common facility (e.g., ISFSI, unique hazards, design considerations, etc.).

Credit for DEP may be granted across a fleet or multiple technologies that a common facility 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.

Failure to correct a WEAKNESS in a common facility is subject to inspection for compliance to 10 CFR 50.47(b)(14). The compliance issue is applicable to the site that exhibits the subsequent DEP failure.

43 Credit can be granted to Key Positions for ERO Participation for a Security related Drill or
44 Exercise as long as the Key Positions are observed evaluating the need to upgrade to the next
45 higher classification level and/or evaluating the need to change protective action
46 recommendations. Key TSC Communicator and Key EOF Communicator may be granted
47 participation credit as long as the Key Position performs a minimum of one offsite (state/local)
48 update notification. If an individual participates in more than one Security-related Drill/Exercise
NEI 99-02 Revision 6

52

1 in a three year period, only one of the Security-related Drills/Exercise can be credited. A station
2 cannot run more than one credited Security-related Drill/Exercise in any consecutive 4 quarter
3 period. Objective evidence shall be documented to demonstrate the above requirements were
4 met.

5

6 Evaluated simulator training evolutions that contribute to Drill/Exercise Performance indicator
7 statistics may be considered as opportunities for ERO Drill Participation. The scenarios must at
8 least contain a formally assessed classification and the results must be included in DEP statistics.
9 However, there is no intent to disrupt ongoing operator qualification programs. Appropriate
10 operator training evolutions should be included in this indicator only when Emergency
11 Preparedness aspects are consistent with training goals.

12

13 If an ERO member filling a Key Position has participated in more than one drill during the eight
14 quarter evaluation period, the most recent participation should be used in the Indicator statistics.

15

16 If a change occurs in the number of ERO members filling Key Positions, this change should be
17 reflected in both the numerator and denominator of the indicator calculation.

18

19 If a person is assigned to more than one Key Position, it is expected that the person be counted in
20 the denominator for each position and in the numerator only for drill participation that addresses
21 each position. Where the skill set is similar, a single drill might be counted as participation in
22 both positions.

23

24 Assigning a single member to multiple Key Positions and then only counting the performance for
25 one Key Position could mask the ability or proficiency of the remaining Key Positions. The
26 concern is that an ERO member having multiple Key Positions may never have a performance
27 enhancing experience for all of them, yet credit for participation will be given when any one of
28 the multiple Key Positions is performed; particularly, if more than one ERO position is assigned
29 to perform the same Key Position.

30

31 ERO participation should be counted for each Key Position, even when multiple Key Positions

32 are assigned to the same ERO member. In the case where a utility has assigned two or more Key
33 Positions to a single ERO member, each Key Position must be counted in the denominator for
34 that ERO member and credit given in the numerator when the ERO member performs each Key
35 Position.

36

37 Similarly, ERO members need not individually perform an opportunity of classification,
38 notification, or PAR development in order to receive ERO Drill Participation credit. The
39 evaluation of the DEP opportunities is a crew evaluation for the entire Emergency Response
40 Organization. ERO members may receive credit for the drill if their participation is a meaningful
41 opportunity to gain proficiency in their ERO function.

42

43 When an ERO member changes from one Key Position to a different Key Position with a skill
44 set similar to the old one, the last drill/exercise participation may count. If the skill set for the
45 new position is significantly different from the old position then the previous participation would
46 not count.

47

NEI 99-02 Revision 6

53

1 Participation may be as a participant, mentor, coach, evaluator, or controller, but not as an
2 observer. Multiple assignees to a given Key Position could take credit for the same drill if their
3 participation is a meaningful opportunity to gain proficiency.

4

5 Drills performed by an individual before being assigned to a Key Position in the ERO may be
6 counted once the individual is assigned to the ERO as long as the performance enhancing
7 experience(s) contributes to the Drill/Exercise (DEP) metric. The meaning of “drills” in this
8 usage is intended to include performance enhancing experiences (exercises, functional drills,
9 simulator drills, table top drills, mini drills, etc.) that reasonably simulate the interactions
10 between appropriate centers and/or individuals that would be expected to occur during
11 emergencies. For example, control room interaction with offsite agencies could be simulated by
12 instructors or OSC interaction could be simulated by a control cell simulating the TSC functions,
13 and damage control teams.

14

15 In general, a drill does not have to include all ERO facilities to be counted in this indicator. A
16 drill is of adequate scope if it reasonably simulates the interaction between one or more of the
17 following facilities, as would be expected to occur during emergencies:

18

- 19 · the control room,
- 20 · the Technical Support Center (TSC),
- 21 · the Operations Support Center,
- 22 · the Emergency Operations Facility (EOF),
- 23 · field monitoring teams,
- 24 · damage control teams, and
- 25 · offsite governmental authorities.

26

27 The licensee need not develop new scenarios for each drill or each team. However, it is expected
28 that the licensee will maintain a reasonable level of confidentiality so as to ensure the drill is a

29 performance enhancing experience. A reasonable level of confidentiality means that some
30 scenario information could be inadvertently revealed and the drill remain a valid performance
31 enhancing experience. It is expected that the licensee will remove from drill performance
32 statistics any opportunities considered to be compromised. There are many processes for the
33 maintenance of scenario confidentiality that are generally successful. Examples may include
34 confidentiality statements on the signed attendance sheets and spoken admonitions by drill
35 controllers. Examples of practices that may challenge scenario confidentiality include drill
36 controllers or evaluators or mentors, who have scenario knowledge becoming participants in
37 subsequent uses of the same scenarios and use of scenario reviewers as participants.

38

39 All individuals qualified to fill the Control Room Shift Manager/ Emergency Director position
40 that actually might fill the position should be included in this indicator.

41

42 The communicator is the Key Position that fills out the notification form, seeks approval and
43 usually communicates the information to off site agencies. Performance of these duties is
44 assessed for accuracy and timeliness and contributes to the DEP PI. Senior managers who do not
45 perform these duties should not be considered communicators even though they approve the
46 form and may supervise the work of the communicator. However, there are cases where the
47 senior manager actually collects the data for the form, fills it out, approves it and then
48 communicates it or hands it off to a phone talker. Where this is the case, the senior manager is
49 also the communicator and the phone talker need not be tracked. The communicator is not

NEI 99-02 Revision 6

54

1 expected to be just a phone talker who is not tasked with filling out the form. There is no intent
2 to track a large number of shift communicators or personnel who are just phone talkers.