



NRC Regional And Headquarters Update

Robert Kahler, Chief – Session Leader
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U.S. Nuclear Regulatory Commission



NRC Region 1 Update

Steve Barr, Senior EP Inspector
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U.S. Nuclear Regulatory Commission

Region 1

- Alert and Notification Systems (ANS)
 - Issues Resolved, New ANS Placed In Service On August 27, 2008
 - NRC Wrap-up Inspection in December 2008
 - IP 92702, “Follow-up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, and Alternate Dispute Resolution Confirmatory Orders”

Region 1

- Alert and Notification Systems (ANS)
 - Aug 2009: FEMA/NRC Inspection
 - Sep 2009: “Software” problem
 - Dec 2009: Transmission/feedback polling issues
 - Mar 2010: NRC PI&R Sample inspection
 - Next Step: Final FEMA approval

Region 1

- **PI&R Sample Inspections (IP71152)**
 - ROP calls for quarterly sample inspections
 - Often only way to get an EP issue inspected between exercise and program inspections
 - Examples:
 - EAL changes or implementation
 - EP equipment problems/plan compliance
 - ANS performance

Region 1

- **Observation: ERO staffing**
 - Aging Paradox:
 - Experienced ERO (knowledge)
 - Newer ERO (procedures)
 - Examples
 - Should EP be performance-based or knowledge-based?
 - Challenge to manage an ideal mix

Region 1

- **Transitory Events & EAL Satisfaction**
 - Two sites, both had low water level events at intake structure
 - Both had low level alarms indicating EAL threshold had been reached
 - One site easy to disposition, one not so easy...
 - Know/train on what your EALs and Plan say

Region 1

- **Transitory Events & EAL Satisfaction**

NEI 99-01, Section 3.12:

“... in cases when EAL declaration criteria may be met momentarily during the normal expected response of the plant, declaration requirements should not be considered to be met when the conditions are a part of the designed plant response, or result from Operator actions.”

Region 1

- **DEP PI**
 - Apparent paradox
 - Good metric performance, or
 - Good ERO training?
 - Possible solution...

Region 1

Region I EP Points of Contact:

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NRC Region 2 Update

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Region 2

- New Region 2 office location
 - U.S. NRC Region II
Marquis One Tower
245 Peachtree Center Avenue N.E., Suite 1200
Atlanta, GA 30303
- New Construction Region

Region 2

- Supplemental Inspections
 - Lessons Learned
 - Revised Inspection Procedure
- Expectations for Baseline Inspections
 - Licensee staff knowledge level
 - Exercise scenarios

Region 2

- Change Management
 - Staffing level changes due to fatigue rule
 - Information Notice 2005-19, “Effect of Plant Configuration Changes on the Emergency Plan

Region 2

- Biennial Exercise Exemptions
 - Hurricanes, Plant Events
 - Complete commitments in request
 - Resolution of inspector questions prior to exercise performance
- Hurricane Season/Response



NRC Region 3 Update

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U.S. Nuclear Regulatory Commission

Region 3

- Emergency Plan/Emergency Action Level Revisions
- Emergency Preparedness Capabilities Affected by Plant Equipment
- Emergency Response Organization Augmentation

Region 3

Emergency Plan & Emergency Action Level Revision Issues

- Reductions in Effectiveness
 - Reductions in Onshift Staffing
 - Current EAL Revisions Under Evaluation For Potential Reductions In Effectiveness

Region 3

Emergency Preparedness Capabilities Affected by Plant Equipment Operability

- Site Emergency Response Readiness
 - Reliance on Vital and Non-Vital Equipment to Perform Required Emergency Response Capabilities
- Currently Evaluating Regulations & Requirements:
 - Computers (Emergency Assessment – Dose Assessment, Core Damage, Plant Radiation Monitoring, etc.)
 - Telephones and Public Address (Notifications, Activation, Evacuation, Direction, etc.)

Region 3

Emergency Response Organization Augmentation

- Region 3 Issues Currently Under Evaluation:
 - Specialized ERO Staffing Covered by Non-Qualified Staff
 - Adequacy of Augmentation Testing When Used to Demonstrate Licensee's Capabilities
 - Changes in Facility Access Post 9/11 Impacting Timeliness of ERO Response to Their Facilities



NRC Region 4 Update

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Region 4

- Regulatory Findings in Region 4
- Event/Drill Response Concerns
- Other Observations

Region 4

2009 Summary of Regulatory Findings

- On-shift ERO Expired Qualifications
- Protective Action Recommendations
 - Unnecessary public evacuations
- Actual Events
 - Failure to Classify
 - Offsite Notification
- Inadequate Critiques

Region 4

2009 Summary of Regulatory Findings

- Met Tower deficiency
- Failure to perform test required by FEMA ANS Design Report
- Failure to make 10 CFR 50.72 Report
- Failure to submit change per 10 CFR 50.4

Region 4

NRC Event Response

- Emergency Notification System (ENS) communication when requested by NRC
- Utilization of Resident Inspector knowledge
 - Control Room
 - Technical Support Center
- Utilization of NRC Management knowledge
 - Emergency Operations Facility

Region 4

Drill and Exercise Program

- Operations Support Center (OSC)
 - high radiation, airborne, or hazardous conditions
- Execution of Simulation
- Drill Conducted within Exercises
 - planning and documentation
- Control of exercise timeline vs free-play

Region 4

Emergency Preparedness Element of Force on Force (FOF) Exercises

- 10 CFR 50.47(b)(14)
- Documentation in Evaluation Report
- FOF Exercises Conducted Between
Triennial Exercises
 - EP Performance Critiques

Region 4

Alert and Notification System

- “Best Effort” to Ensure Coverage
- Reliance on Utility Connections
- Periodic Road/Aerial Surveys



NRC Headquarters Update

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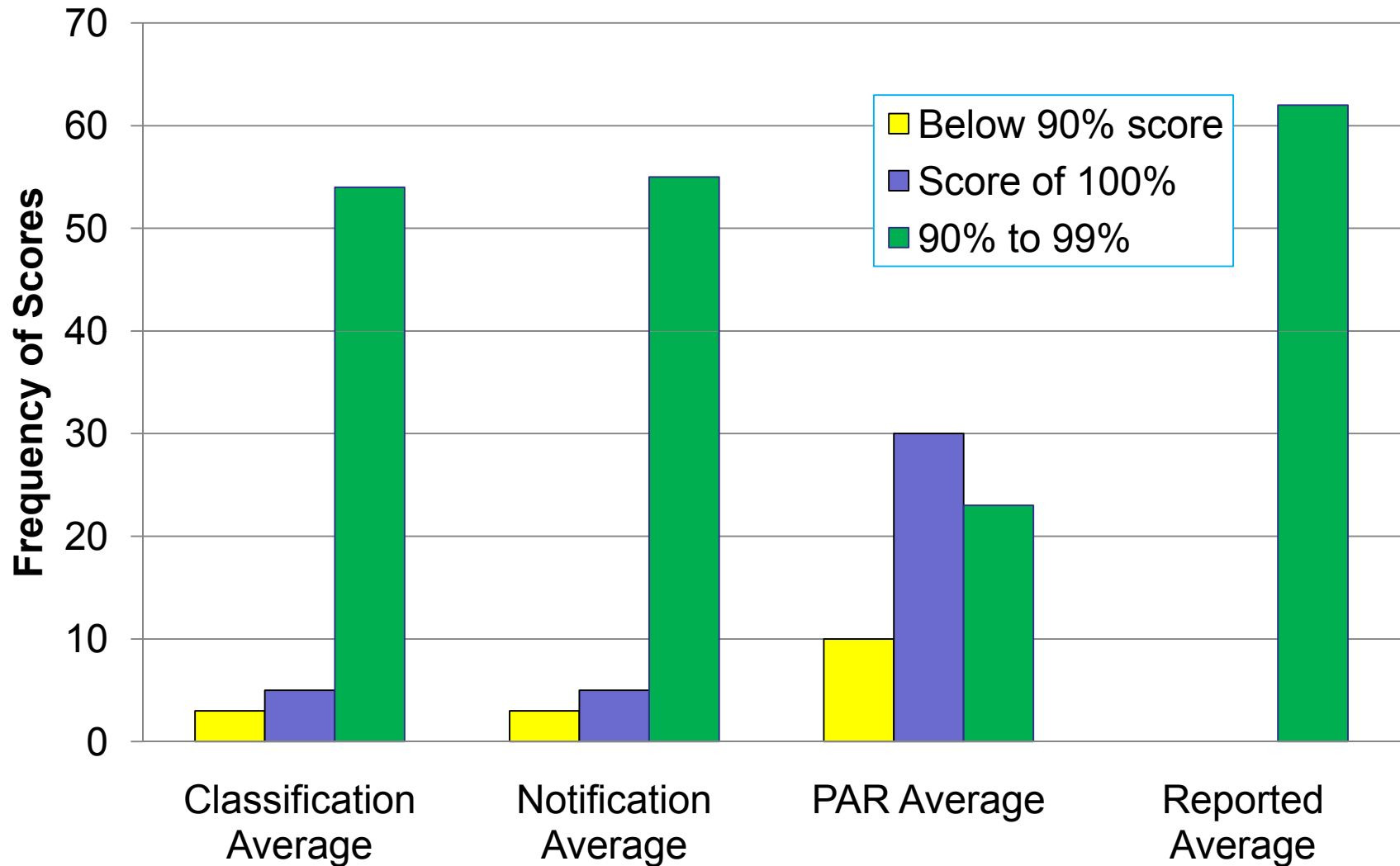
NRC Headquarters

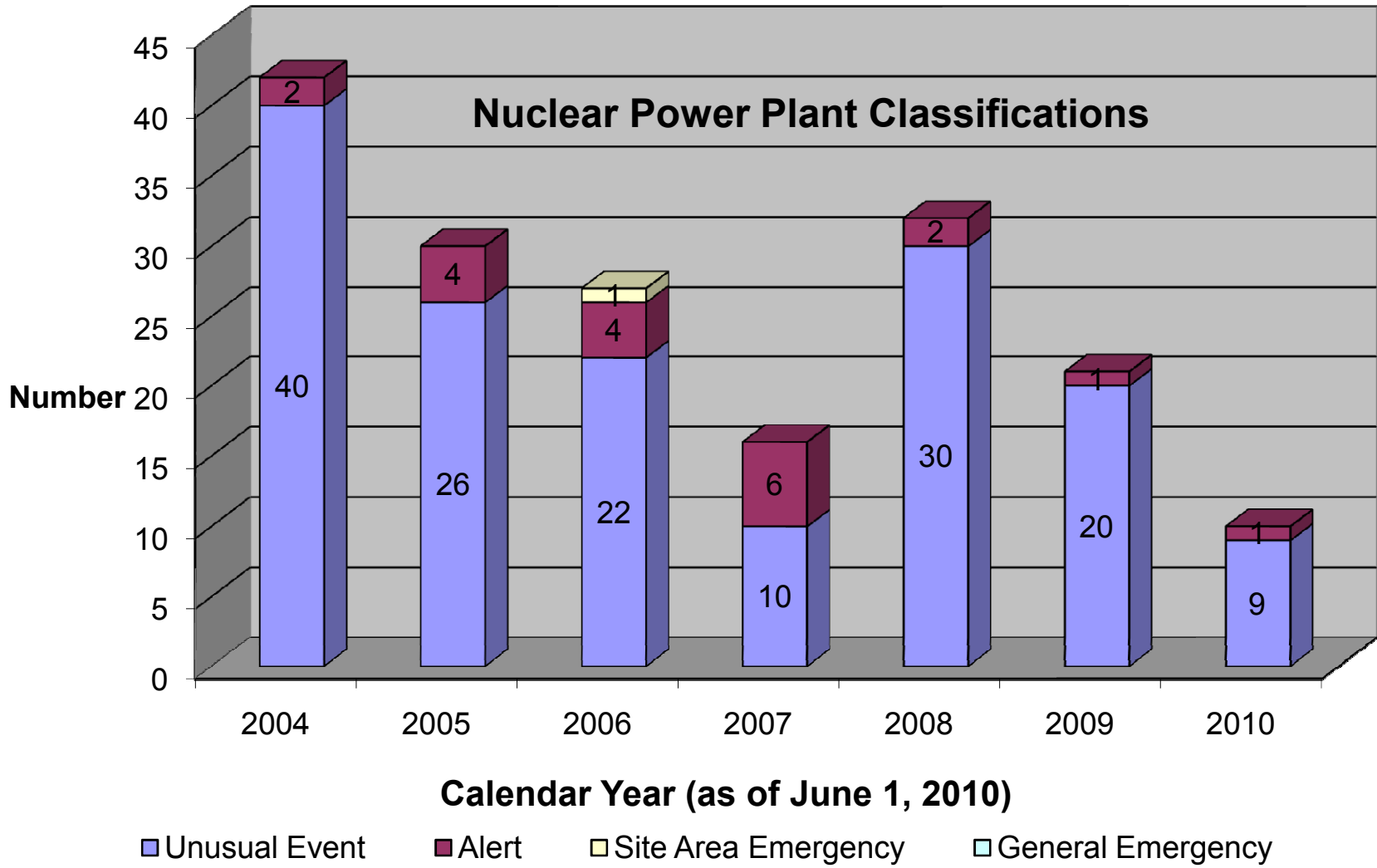
- DEP PI Notification FAQ Resolution
- ERO PI Credit for Combined EOF and Differing Technologies
- Exercise Conduct
 - Quality
 - Critiques
- Joint Information Center
- 10 CFR 50.47(t) Reviews

NRC Headquarters

- **Change Management**
 - Classification
- **Knowledge Management**
 - ERO Staff
 - 10 CFR 50.47(b)(16)
- **Protective Action Recommendations**
 - Supplement 3 to NUREG-0654/FEMA-REP-1
 - Generic Communication
- **DEP PI Temporary Instruction**
 - Data Analysis

Drill & Exercise Performance (DEP) Performance Indicator (PI) Analysis





Fire/Explosion, Toxic Gas & Other Events Number of Classifications

