

## FAQ TEMPLATE

Plant: Tennessee Valley Authority - Sequoyah

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**Performance Indicator:** NEI 99-02 (rev. 6) 2.4 Emergency Preparedness Cornerstone  
Emergency Response Organization Drill Participation and Drill and Exercise Performance

**Site-Specific FAQ (Appendix D)?**

No

FAQ requested to become effective quarter following approval.

### **Question Section**

**NEI 99-02 Guidance needing interpretation (include page and line citation):**

Page 50, Lines 3-8

#### **Purpose**

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

Page 50, Lines 10 - 13

**Indicator Definition**

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

**Event or circumstances requiring guidance interpretation:**

The event/circumstance principally involves utilities with common EOFs where the functions of EOF Senior Manager, EOF Key Protective Measures and EOF Communicator are assigned to Key Positions that generically support multiple nuclear sites.

Utilities with a common EOF established to support multiple nuclear sites have made Key Position assignments to provide implementation of the three functions mentioned above and described in NEI 99-02 rev 6.

ERO members assigned to each function are grouped and monitored to ensure that each member receives a “meaningful opportunity to gain proficiency”. This membership is accounted for at the end of each quarter and entered into the ROP process.

Where common EOFs are established supporting multiple sites the EOF, ERO membership is trained, including involvement in a drill and exercise program to ensure that they are fully qualified to respond to each site served by that EOF when emergencies are declared.

In general given this prescribed condition procedures, processes and protocols have been established that have generic application or in words the **skill set is similar** in application regardless of the nuclear site involved.

Participation Credit is given for these “generic” key positions and counted (as specified in NEI 99-02) for all nuclear sites served by the EOF when a Key Position member is provided a meaningful opportunity to gain proficiency during any one nuclear site drill or exercise.

Currently, DEP Credit is provided to the nuclear site included in the drill or exercise.

**If licensee and NRC resident/region do not agree on the facts and circumstances explain**

NRC region does not agree with the generic participation credit approached and has specified that participation credit can ONLY be provided to the specific site involved in the drill or exercise.

**Potentially relevant existing FAQ numbers**

NA

**Response Section**

**Proposed Resolution of FAQ**

Revise NEI 99-02 to provide clarifying language to more effectively communicate that counting participation credit for NEI 99-02 EOF positions when centralized Emergency Offsite Facilities are utilized or in situations of multiple technologies where common Technical Support Facilities or Operational Support Centers is appropriate as long as:

1) The functions of:

- Classification,
- Protective Action Recommendations (PARs),
- Dose Assessment,
- Emergency Notifications

Are performed where applicable similarly for each site serviced by the common facility.

2) The link between Drill and Exercise Performance and Participation are maintained by granting DEP credit from one drill to all sites served by the common facility.

**If appropriate, provide proposed rewording of guidance for inclusion in next revision.**

***[DRILL AND EXERCISE PERFORMANCE]***

NEI 99-02 Revision 6, page 45

33 If credit for an opportunity is given in the ERO Drill Participation performance indicator, then  
34 that opportunity must be included in the drill/exercise performance indicator. For example, if the  
35 communicator performing the entire notification during performance enhancing scenario is an  
36 ERO member in a Key Position, then the notification may be considered as an opportunity and, if  
37 so, participation credit awarded to the ERO member in the Key Position.

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DEP opportunities performed in a common facility shall also be credited to all nuclear sites served by the common facility, in addition to the nuclear site participating in the drill or exercise, therefore maintaining the link between DEP and participation.

39 When a performance enhancing experience occurs before an individual is assigned to a Key  
40 Position in the ERO, then opportunities for that individual that were identified in advance shall  
41 contribute to the Drill/Exercise (DEP) metric at the time the member is assigned to the ERO.

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***[PARTICIPATION]***

NEI 99-02 Revision 6, page 50

**25 Calculation**

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

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NEI 99-02 Revision 6, page 51

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

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- 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

NEI 99-02 Revision 6, page 51

41 inspection.

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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 opportunities performed in the common facility shall also be credited to all nuclear sites served by the common facility, in addition to the nuclear site participating in the drill or exercise, therefore maintaining the link between DEP and participation.

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 if used may not be identical but the use of the flow chart is the same.
- Protective Action Zones may not be identical but the process that is used to identify the action taken for the zone is the same.
- Implementation of KI strategies may differ based on the implementation strategies of responsible authorities at the State and/or Local level, but the process that is used to determine if KI is warranted is the same.
- PAR development discussions processes are the same for each site serviced by the EOF – i.e. who talks to whom and when that interaction takes place is the same.

### **Dose Assessment**

Dose assessment is similar when methodologies, applicable computer programs, and models are the same across sites and/or technologies served by the common facility. Emergency release definitions are the same. Training for key ERO members performing this function to include site specific and/or technology differences in effluent monitors and release pathways and how these differences impact the dose assessment.

### **Emergency Notifications**

The emergency communicator functions are similar when common facility procedural protocols are performed utilizing a common procedural process, emergency notification and form content. Emergency notifications contacts may differ, but the communicator will be trained on method and equipment differences utilized to make notifications.

### **Classification**

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

### **Link to Drill and Exercise Performance**

Credit for participation may be granted across a fleet or multiple technologies that a common facility ERO 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. DEP opportunities performed in the common facility shall also be credited to all nuclear sites served by the common facility, in addition to the nuclear site participating in the drill or exercise, therefore maintaining the link between DEP and participation.

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