

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- ERO~~ positions when ~~centralized- common~~ Emergency ~~Offsite- Response~~ Facilities are utilized or in situations of multiple site or unit 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 unit/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 units/sites served by the common facility.

3) Training

4) Corrective Actions

2)

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.

38

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, **when common participation has been decided to be counted**, therefore maintaining the link between DEP and participation. **The methodology in affect on the first day of the quarter shall be used for that quarter.**

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

24 The participation indicator may include participation in a facility that supports multiple sites or unit technologies.

25 Calculation

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

27

NEI 99-02 Revision 6, page 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

NEI 99-02 Revision 6, page 51

41 inspection.

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As an alternative methodology, participation credit may be granted for those key positions for all nuclear sites served by the common facility during any one nuclear site drill ~~W~~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 when using this alternative methodology 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.

Skill sets Processes/activities are similar when the processes/activities are when the procedures, processes and protocols related to each other for the purpose of accomplishing the same task/goal. Examples of similar skill sets 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 procedures, processes and protocols for the development of the protective action recommendations are essentially 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 strategies 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. Definitions of what constitute a radiological release during a classified emergency are the same. 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 procedures esal, processes and protocols are performed utilizing a common procedural process, emergency notification and form content. Emergency notifications contacts and form content may differ, but the communicator will be trained on method, and equipment, contact and other applicable differences utilized to make notifications.

Classification

Emergency Classification of an emergency processes are is similar when the Emergency Action Level proceduresal, processes and protocols are the same for all units/sites and/or technologies served by the common facility. Training for key ERO members performing this function should include unit/site specific

and/or technology differences in Initiating Conditions / Emergency Action Levels for units/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 multiple sites or unit technologies 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 multiple sites~~ and/or unit 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 ~~multiple sites~~ fleet and/or unit 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