

**COMPARISON OF INTERIM STAFF GUIDANCE (ISG)  
EMERGENCY PLANNING FOR NUCLEAR POWER PLANTS  
NSIR/DPR-ISG-01, REV. 0 (9/30/10) TO NEI 10-05, REV. 0**

	<b>ISG - Guidance Section Wording</b>	<b>NEI 10-05 Guidance</b>
1.	<p>To ensure that the on-shift staff can cope with site-specific DBAs and the DBT until the augmenting ERO arrives, each licensee should:</p> <ul style="list-style-type: none"> <li>• Define the events that will require a staffing analysis. These events should include the DBAs presented in the FSAR, as updated, and which would result in an emergency declaration. They should also include the DBT.</li> </ul>	<p>NEI 10-05 defines the events that will require a staffing analysis. These events include the DBAs presented in the FSAR, as updated, and which would result in an emergency declaration. They also include the DBT. <i>See discussion in sections 1 and 2. Also refer to step 3.2.1.</i></p>
2.	<p>For the DBT and each DBA, perform a detailed analysis, such as a job/task analysis (JTA) or time-motion study, to identify the emergency response actions that on-shift personnel must perform prior to the arrival of the augmenting ERO staff, as described in the licensee's emergency plan.</p>	<p>For each DBA and the DBT:</p> <ul style="list-style-type: none"> <li>• The Collateral Duty Identification Analysis (CDIA) takes credit for the JTAs performed as part of the licensed operator and firefighter training programs. <i>See steps 3.1.7 and 3.1.8.</i></li> <li>• The CDIA requires that site-specific tasks are determined and listed for the RP and Chemistry Technician positions, and emergency plan implementation (i.e., a JTA is performed for these major response areas). <i>See steps 3.2.2.5 and 3.2.2.6.</i></li> <li>• A Time Task Analysis (TTA), if necessary, also requires development of a site and event-specific listing of emergency response actions (i.e., a JTA). <i>See discussion in section 4 and related appendices.</i></li> </ul>
3.	<p>Consider the major functional areas and tasks listed in NUREG-0654, Table B-1, when performing the detailed analysis (i.e., plant operations and assessment of operational aspects, emergency direction and control, notification/communication, radiological accident assessment and support of operational accident assessment, and others).</p>	<p>The CDIA and TTA processes both consider the Major Functional Areas and Major Tasks listed in NUREG-0654, Table B-1, as well as additional actions identified by a review of related operating experience and regulatory documents. <i>See discussion in sections 3 and 4, and related appendices.</i></p>
4.	<p>Use the detailed analysis specified above to determine if the current minimum on-shift staff can adequately perform all required emergency response actions in a timely manner until augmenting ERO staff is required to arrive. Additional duties assigned to on-shift staff may be acceptable provided that those duties do not detract from the</p>	<p>The CDIA and, if necessary, TTA will determine if the current minimum on-shift staff can adequately perform all required emergency response actions in a timely manner until augmenting ERO staff is required to arrive. <i>See discussion in sections 3 and 4, and related appendices.</i></p>

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	timely performance of their primary duties.	
5.	<p>Identify positions which have a collateral duty that could affect the timely performance of an emergency response function/task. Licensees should promptly enter any such results into their corrective action program for resolution.</p>	<p>The CDIA and, if necessary, TTA will identify positions which have a collateral duty that could affect the timely performance of an emergency response function/task. <i>See discussion in sections 3 and 4, and related appendices.</i></p> <p>Section 2.1 states, "Following completion of all analyses, licensees are expected to promptly enter any unsatisfactory results into their Corrective Action Program for resolution."</p> <p>Step 4.2.3.B states, "If an overlap or other conflict is identified, the issue must be documented within the station corrective action process, evaluated and addressed."</p>
6.	<p>A DBT or DBA event description may not specify the performance of some major functions or tasks listed in NUREG-0654, Table B-1. Examples include the major task of "Repair and Corrective Actions" and the major functional area of "Rescue Operations and First-Aid." In these cases, the licensee's staffing analysis should specify the resources available to perform these functions and tasks, if needed. They may be assigned as a collateral duty to a designated on-shift responder.</p>	<p>The task of "Repair and Corrective Actions" and the function of "Rescue Operations and First Aid" are not typically included in a Design Basis Accident (DBA) analysis. Likewise, their performance would not be required under the assumptions for the Design Basis Threat (DBT) analysis (see step 3.1.4). Licensees should continue to use the guidance contained in NUREG-0654, Table B-1, concerning the assignment of these actions, i.e., they may be provided by shift personnel assigned other functions. It remains acceptable to assign this task and function as collateral duties to qualified personnel.</p> <p><i>See step 3.1.12.</i></p>
7.	<p>With respect to the DBT analysis, licensees may assume that the hostile threat is neutralized with no adverse consequences to plant safety. However, licensees should ensure that sufficient staff is available to simultaneously implement both the emergency plan and the security plan.</p>	<p>With respect to the DBT staffing analyses, it may be assumed that a HOSTILE FORCE breached the Protected Area fence but was neutralized with no adverse consequences to plant safety. Damage inflicted on plant systems, structures and components is not sufficient to prevent safe shutdown or cause a radiological release. There is no fire significant enough to warrant firefighting efforts prior to the arrival of offsite resources and/or the augmented ERO. The analysis should confirm that sufficient staff is available to simultaneously implement both the emergency plan and the security plan. <i>See section 3.1.4.</i></p>

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8.	Staffing analyses and results are not considered to be part of the emergency plan. However, the results should be documented and available for NRC inspection.	The staffing analyses performed in accordance with this document are not part of the site's emergency plan and are not subject to the requirements of 10 CFR 50.54(q); however, any proposed changes to staffing levels described in the emergency plan are subject to the requirements of 10 CFR 50.54(q). Although there are no regulatory submittal requirements associated with staffing analyses, they must be retained and available for regulatory inspection. <i>See Executive Summary.</i>
9.	On-shift staff must be capable of taking emergency actions to safely shut down the reactor, mitigate accident consequences, notify augmented ERO staff and OROs, determine PARs for site personnel and the public, perform firefighting, and provide medical assistance if needed. NUREG-0654, Table B-1, specifies key functional areas. On-shift staff must not be assigned additional responsibilities that could detract from the performance of their primary emergency plan functions.	NEI agrees that a nuclear power plant's on-shift Emergency Response Organization (ERO) staff must be capable of implementing the site emergency plan to address a spectrum initiating events and consequences. Key emergency response functions and tasks are described in NUREG-0654, and include: <ul style="list-style-type: none"> <li>• Shutdown the reactor and maintain safe shutdown</li> <li>• Mitigate event consequences</li> <li>• Notify augmented ERO staff and Offsite Response Organizations (OROs)</li> <li>• Determine Protective Action Recommendations (PARs) for site personnel and the public</li> <li>• Perform firefighting</li> <li>• Provide medical assistance if needed</li> </ul> The on-shift ERO staff must not be assigned additional responsibilities that could detract from the performance of their primary emergency plan functions. <i>See Executive Summary. NEI 10-05 was developed to meet the above requirement.</i>