

ATTACHMENT 82002.02

PROCEDURE QUALITY

82002.02-01 INSPECTION OBJECTIVES

To verify, during plant construction (and prior to fuel load of the plant), the adequacy of the facility Emergency Preparedness (EP) procedures and to ensure the licensee's ability to transition to monitoring under the reactor oversight process.

82002.02-02 INSPECTION REQUIREMENTS

02.01 Review the emergency action level (EAL) procedures for adequacy.

02.02 Review notification procedures for adequacy.

02.03 Review Protective Action Recommendation (PAR) development procedures for adequacy.

02.04 Review Emergency Plan Implementing Procedures (EPIPs) for adequacy in implementing the Emergency Plan.

02.05 Determine the effectiveness of licensee corrective actions in addressing procedure quality issues.

02.06 Provide inspection information on the results of the procedure review to support the determination of whether the EP program is in a state of operational readiness.

82002.02-03 INSPECTION GUIDANCE

03.01 Requirements for EALs may be found in 10 CFR 50.47(b)(4) and 10 CFR Part 50, Appendix E, Section IV.B. Some licensees will have event-based EALs. Some licensees will have symptom-based EALs that often are based on the status of fission product barriers. Some licensees will have EALs based on the status of critical safety functions and their relationship to the status of fission product barriers. In all cases, it should be possible to compare EAL schemes to the example initiating conditions in Appendix 1 of NUREG 0654/FEMA REP 1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants;" NUMARC/NESP-007, Revision 2, "Methodology for Development of Emergency Action Levels;" NEI 99-01 Revision 5, "Methodology for Development of Emergency Action Levels;" or NEI 07-01 Revision 0, "Methodology for Development of Emergency Action Levels Advanced Passive Light Water Reactors," and this comparison should result in equivalent classifications. The licensee shall indicate which methodology has been utilized. The inspector must verify that the licensee's EAL procedure(s) ensure that the EALs are consistent in range, units, and conversion factors with appropriate control room instrumentation and that the decisional

aids used for event classification in the control room, the Technical Support Center (TSC), and the Emergency Operations Facility (EOF) are readily available and consistent. The inspector must be alert for any management directives that would delay classification until management notifications or other actions are performed that are not immediately necessary for public health and safety.

03.02 The inspector will determine whether the licensee has adequate procedures to direct the user to notify offsite authorities accurately and promptly of emergency conditions. The content of initial and follow-up emergency messages to offsite authorities shall be verified as adequate with regard to data and information requirements. The inspector must review the licensee's notification procedures for consistency with the emergency classification and action level scheme. One important aspect of the notification procedures is the existence in the procedures of the expectation to promptly (within 15 minutes) initiate notifications after declaring an emergency (see 10 CFR Part 50, Appendix E, Section IV.D.3). Verify that usable and current procedures exist in the control room and in the licensee's emergency response facilities. Verify that procedures contain provisions for message verification.

Initial and follow-up emergency messages will be consistent with the guidance of Part II, Sections E.3 and E.4, of NUREG-0654. At a minimum, messages must contain the following data:

- a. classification of the emergency
- b. emergency action level upon which the emergency declaration is based
- c. a brief description of the plant conditions supporting the classification
- d. the status of any offsite releases of radioactive material
- e. meteorological conditions at the release point
- f. offsite protective action recommendations or whether no such recommendations are required

03.03 The organizational elements, responsibilities, and authorities in the EIPs for protective action recommendations must be compared with those in the Emergency Plan. The EIPs shall clearly specify a methodology that enables the licensee to make protective action recommendations appropriate for the particular plant conditions (see NUREG-0654, Appendix 1, and NUREG-0654, Supplement 3, EPA-400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," Regulatory Information Summary (RIS) 2005-08, "Endorsement of Nuclear Energy Institute (NEI) Guidance for Range of Protective Actions for Nuclear Power Plant Incidents," and IE Information Notice 83-28, "Criteria for Protective Action Recommendations for General Emergencies (GE)."

- a. Verify the licensee's procedures for making offsite protective action recommendations are able to be used by the on-shift crew with the information available to them in the control room.

- b. Verify that the licensee's procedures provide for the generation of protective action recommendations on an ad-hoc basis for distances beyond the ten-mile plume exposure emergency planning zone. PARs will not deviate substantially from those contained in Federal guidance (NUREG-0654, Supplement 3 and EPA-400) unless the licensee's agreement with the offsite agencies specifies such a deviation. In such cases, review the licensee's basis for its PAR policy.

03.04 Verify that the Emergency Plan contains a listing, by title, of procedures required to implement the Plan. Procedures should be available, but not necessarily limited to, information needed to demonstrate compliance with Plan elements such as: the organization for coping with radiation emergencies, assessment action, activation of emergency organization, notification procedures, emergency facilities and equipment, training, maintaining emergency preparedness and recovery. Licensees should have procedures necessary to implement the standards of 10 CFR 50.47(b), against which the Emergency Plan is evaluated for compliance.

03.05 No inspection guidance.

03.06 No inspection guidance.

82002.02-04 RESOURCE ESTIMATE

It is estimated that conduct of this attachment will take 40 hours.

END

Exhibit 1

Revision History for IP 82002.02

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	11/08/2011 CN 11-030 ML111040279	Initial issue to support inspections of construction programs described in IMC 2504, Construction Inspection Program: Inspection of Construction and Operational Programs. Completed 4 year search of historical CNs and found no commitments related to this Inspection Procedure.	N/A	N/A	N/A