

ATTACHMENT 82002.05

EMERGENCY RESPONSE ORGANIZATION ON-SHIFT STAFFING AND AUGMENTATION DRILLS

82002.05-01 INSPECTION OBJECTIVES

To verify, prior to fuel load of the plant, the adequacy of the licensee's on-shift Emergency Response Organization (ERO) staffing and its ability to augment the ERO.

82002.05-02 INSPECTION REQUIREMENTS

02.01 Review Emergency Response Organization (ERO) on-shift staffing

- a. Verify that the licensee's detailed on-shift staffing analysis required by 10 CFR 50, Appendix E, Section IV.A.9 has been completed and that there are no on-shift staffing deficiencies.
- b. Determine the adequacy of the licensee's ERO on-shift staffing levels.

02.02 Implement Inspection Procedure 71114, "Reactor Safety - Emergency Preparedness," Attachment 71114.03, "Emergency Response Organization Staffing and Augmentation System." Implement the IP elements designated for the initial augmentation system design.

02.03 Review ERO Augmentation staffing.

02.04 Review the specific elements of the ERO Augmentation drill scenario.

02.05 Determine through observation of an ERO Augmentation drill whether ERO members can augment the on-shift staff in a timely manner.

02.06 Determine the effectiveness of licensee corrective actions in addressing ERO on-shift and augmentation staffing issues.

82002.05-03 INSPECTION GUIDANCE

03.01 Review the licensee's on-shift staffing analysis required by 10 CFR 50, Appendix E, Section IV.A.9. Determine if the licensee used the scope of scenarios specified in NSIR/DPR-ISG-01, "Interim Staff Guidance, Emergency Planning for Nuclear Power Plants," for this analysis or an alternative scope of scenarios. If an alternative scope of scenarios was used, review the licensee's justification for its choice of scenarios.

Verify that the licensee entered any on-shift staffing deficiencies from its analysis into the corrective action program and either corrected those deficiencies or placed compensatory measures in place until final on-shift staffing levels are attained. If no on-

shift staffing deficiencies were noted in the analysis, review the licensee's on-shift staffing commitments specified in the Emergency Plan against those in NUREG-0654, Table B-1. Verify that the licensee has provided justification for any variance from Table B-1 on-shift staffing levels.

03.02 No inspection guidance.

03.03 The inspector shall understand the duty roster, the minimum ERO staffing necessary to activate emergency response facilities (ERFs) to meet Emergency Plan requirements, and the reference starting time (e.g., event declaration or ERO notification). Conduct of the drill requires NRC inspection personnel to be stationed at the ERFs` to determine if responding ERO members can meet augmentation timeliness goals.

An ERF may not require all ERO members to be present in order to declare the facility functional. Some licensees' Emergency Plans identify the minimum staff/positions necessary for a functional facility. In the absence of such a pre-determination, the guidance of NUREG-0654, Table B-1 may be used.

03.04 An ERO augmentation drill will be necessary to determine that the licensee's EP program can meet augmentation goals and/or has determined the extent of problem conditions. Elements of the augmentation drill shall include:

- a. Activation of the augmentation system.
- b. The time of the ERO augmentation drill must be held confidential, although the plan to implement such a drill may be communicated to employees as this may be a significant departure from normal operations.
- c. It may be appropriate to notify local authorities of the augmentation drill so as not to unduly alarm officials.
- d. The activation must simulate emergency activation of the ERO and also notify personnel that it is a drill and not an actual emergency. This message would have to be crafted in a manner that would request personnel to respond as if it were an actual emergency.
- e. It may be appropriate to include the actual set up and activation of facilities as part of the augmentation drill.

03.05 Requirements for activation of the emergency organization may be found in 10 CFR Part 50, Appendix E, Section IV.C. The licensee's Emergency Plan, implementing procedures, and other relevant documentation should be reviewed to determine expectations for successful ERF activation. It may be useful to identify the ERO actions for the activation of the augmentation system, ERO personnel expected to respond, any offsite authorities notified as part of the augmentation, and any corporate support personnel expected to respond.

03.06 Request from the licensee a printout of corrective action items concerning on-shift and augmentation ERO staffing deficiencies. Verify that adequate corrective actions were identified and implemented to correct those deficiencies..

82002.05-04 RESOURCE ESTIMATE

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

END

Exhibit 1

Revision History for IP 82002.05

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	11/08/11 CN 11-030 ML111040310	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.	None	N/A	N/A