

## ATTACHMENT 82002.07

### OPERATIONAL STATUS OF THE EMERGENCY PREPAREDNESS PROGRAM

#### 82002.07-01 INSPECTION OBJECTIVES

To verify, during the final phase of new plant construction (and prior to fuel load of the plant), the operational readiness of the licensee's Emergency Preparedness (EP) Program; to ensure its ability to transition to monitoring by the reactor oversight process.

#### 82002.07-02 INSPECTION REQUIREMENTS

02.01 Organization and Management Control. Verify that the licensee has developed appropriate organization and management controls within the Emergency Plan and emergency plan implementing procedures (EIPs).

02.02 Training. Verify that individuals that are assigned key roles for emergency response have been trained as required and understand their emergency assignments, responsibilities, authorities, and changes to the EIPs.

02.03 Independent and Internal Reviews and Audits. Examine independent and internal review and audit reports of the licensee's EP programs.

02.04 Effectiveness of Licensee Controls. Evaluate the effectiveness of the licensee's controls in identifying, resolving and preventing problems by reviewing such areas as corrective action systems, root cause analyses, safety committees, and self assessment in the area of EP.

#### 82002.07-03 INSPECTION GUIDANCE

##### General Guidance

Evaluations conducted in accordance with this procedure are limited to the staff, activities, records, and facilities of the licensee.

##### Specific Guidance

03.01 Organization and Management Control. Based on discussions with licensee management and the review of relevant documentation, determine whether the licensee's organization and management control systems are appropriate and have been incorporated into the Emergency Plan and EIPs. Reviewing relevant portions of the Emergency Plan and EIPs is a way to verify that all organization and management controls are included. The inspectors shall look for documentation on organizational structure; responsibilities, authorities and staffing of key emergency response personnel; interfaces and coordination between onsite, offsite, and corporate organizations; and shift staffing. Such details include, but are not limited to, the following:

- a. The inspector shall review the duties assigned to the Emergency Planning Coordinator (EPC). The inspector shall ensure that there is a description of the reporting chain or the EPC is not assigned additional responsibilities outside the EP area. The inspector should examine the organizational or administrative

procedures and interview licensee personnel.

- b. The inspector shall review the corporate and plant staff organization to determine the personnel who have emergency planning responsibilities.
- c. The inspector shall review the assignment and qualifications of individuals to the emergency organization. A review of the training and qualification records of individuals assigned functional responsibilities in the emergency organization will indicate whether the individual(s) completed all training requirements before the assignment and are qualified to fulfill the assigned responsibilities.
- d. The inspector shall review the key offsite response personnel and methods of coordination with them. This information is normally obtained from the licensee or from the FEMA Radiological Emergency Preparedness (REP) Regional Assistance Committee (RAC) Chairman.
- e. The inspector shall review personnel availability that may affect augmentation of the emergency organization (e.g. proximity of personnel to the plant).
- f. The inspector shall review agreements with offsite response organizations.

### 03.02 Training

- a. Requirements for training are found in 10 CFR 50.47(b)(15) and 10 CFR Part 50, Appendix E, Item IV.F. The inspector will interview the Emergency Coordinator, Emergency Directors in the emergency response facilities (ERFs), the Shift Supervisor, and selected individuals involved in the notification process. As part of the interview process, a walk-through with the shift crew, including the Shift Supervisor and Shift Technical Advisor, on one or more shifts (as necessary to assess training effectiveness rather than individual performance) is required. During the walk-through, responsible licensee emergency response staff and management, as appropriate, will be able to (1) evaluate hypothetical conditions or data, (2) identify respective emergency action levels, (3) evaluate or, where appropriate, perform dose calculations (4) classify the emergency using the latest procedures, and (5) recommend appropriate protective actions.
  - 1. The inspector shall verify that the licensee uses the correct procedures and demonstrates proficiency during each step in the classification and notification processes. Classifications must be correct. Notifications will be made as required. Both classifications and notifications shall be done in a timely manner.
  - 2. For each emergency classification, the inspector shall verify that the licensee demonstrates proficiency for initiating protective actions onsite and recommending those to be taken offsite. Requirements for protective actions are found in 10 CFR 50.47(b)(10).
- b. Significant changes to the licensee's procedures and equipment must be examined and discussed with responsible personnel to determine whether the personnel are aware of the changes, understand them, and have received training appropriate for their use.

03.03 Independent and Internal Reviews and Audits. Independent and internal reviews or audits of the licensee's EP program are generally done on a 12-month cycle. Requirements may be found in 10 CFR 50.54(t). The qualifications of the respective

audit personnel are normally found in the licensee's Quality Assurance (QA) Manual. Criteria for auditors normally include training and experience commensurate with the scope, complexity, and special nature of the activities being audited. Audit personnel are required to have no direct responsibility for the development or implementation of the EP program. Inspectors must determine whether the licensee's Emergency Plan and/or EIPs require audits that meet these requirements.

03.04 Effectiveness of Licensee Controls. The inspector shall review the effectiveness of licensee controls. The inspector will determine whether the licensee has implementing procedures to ensure the following with regard to safety issues, events or problems:

- a. Initial identification of the problem.
- b. Elevation of problems to the proper level of management for resolution (internal communications and procedures).
- c. Root cause analysis.
- d. Disposition of operability issues.
- e. Implementation of corrective actions.
- f. Expansion of the scope of corrective actions to include applicable related systems, equipment, procedures and personnel actions.

#### 82002.07-04 RESOURCES

The estimated time to complete this procedure is 35 hours of direct onsite inspection effort (when conducting public meetings, add an additional 10 hours).

#### 82002.07-05 REFERENCES

Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 5.

NUREG-0396, "Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants," December 1978 (Microfiche Address: 00567/260 - 00568/40).

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," November 1980 (Microfiche Address: 01997/314 - 01998/71).

NUREG-0696, "Functional Criteria for Emergency Response Facilities," February 1981 (Microfiche Address: 08158/270-313).

NUREG-0731, "Guidelines for Utility Management Structure and Technical Resources," September 1980 (Microfiche Address: 06910/234-265).

NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980 (Microfiche Address: 07003/27-284) and Supplement 1, January 1983 (Microfiche Address: 17301/342-363).

EPA-520/1-75-001-A, "Manual of Protective Actions for Nuclear Incidents," January 1990.

ANSI/ANS 3.1-1981, "Selection, Qualification and Training of Personnel for Nuclear Power Plants," (Supersedes ANSI N18.1-1971-77) (Microfiche Address: 65959/199-225).

END

Exhibit 1

Revision History for IP 82002.07

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 ML111040328	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