

## ATTACHMENT 71114.06

INSPECTABLE AREA: Drill Evaluation

CORNERSTONE: Emergency Preparedness

INSPECTION BASES: The Emergency Preparedness (EP) Cornerstone licensee response band is established by the Performance Indicator (PI) system and the licensee's corrective action program. The efficacy of the Drill and Exercise Performance (DEP) PI data is dependent upon the adequacy of the drill and exercise critiques. If the critique program does not appropriately identify weaknesses (performance **problems**), the DEP PI licensee response band comes into question. **The Emergency Response Organization (ERO) Drill Participation PI provides an indication of licensee efforts to develop and maintain key skills through the conduct of performance-enhancing experiences.**

These two PIs, complemented by effective conduct of drills and exercises, effective assessment of performance via a formal critique process and the effective correction of weaknesses, **allows** a licensee response band to be established that includes: training quality and conduct, E-Plan implementing procedure quality, facility and equipment readiness, personnel performance in drills and exercises, organizational and management changes and communications equipment readiness.

This inspection **is for the Resident Inspector to evaluate:**

- Adequacy of **licensee's** assessment of performance via a formal critique process.
- **Ability to identify EP weaknesses during selected drills and training evolutions.**
- **The licensees use of its CAP to correct EP weaknesses identified during selected drills and training evolutions**

This inspection activity is associated with planning **standard 10 CFR 50.47(b)(14).**

This inspection verifies aspects of the Emergency Preparedness Cornerstone for which there are no indicators to measure performance.

71114.06-01 INSPECTION OBJECTIVE

01.01 To evaluate the adequacy of the licensee's conduct of selected drills and training evolutions and **its capability** to assess performance via a formal critique process in order to identify and correct weaknesses.

71114.06-02 INSPECTION REQUIREMENTS

02.01 **Select a sample of** EP drills and training evolutions identified as contributing to the DEP and ERO PIs **to observe**. Plan to inspect a sample of three drills and/or training evolutions, such that a minimum of one EP drill **and some combination of two additional** drills and/or training evolutions **are observed**.

02.02 **Observe the licensee's** performance during the EP drill/training evolution. Emphasis **should be on** the risk-significant activities of classification, notification, dose assessment and protective action recommendation (PAR) development. **Review DEP PI individual inputs for degraded performance and/or adverse trends to ensure areas of weakness are observed**.

02.03 **Verify any** EP weakness observed by the inspector **are** appropriately identified in the licensee's formal critique and entered into the corrective action program.

02.04 **Identify recurring weaknesses in similar activities from previous drill and or training opportunities in order to evaluate the effectiveness of corrective actions**.

02.05 **Identify any weaknesses that may reveal a failure to comply with a regulatory requirement**.

02.06 Determine **if the** licensee assessment of DEP PI **opportunity(ies) is/are accurate**.

71114.06-03 INSPECTION GUIDANCE

The primary focus of this inspection is to verify licensee critique of the risk-significant areas **from** EP drills and training evolutions identified as DEP and ERO **Drill PI opportunities**. **Consider the prioritization** guidance in **IP 71114.01 Attachment 2, "Prioritization of Additional Areas for Inspection" to develop a plan to deploy inspection resources to observe other activities as practical**. Select other areas for inspection based on resource availability, past history, efforts to correct weaknesses and/or logistical limitations

03.01 Select EP Drills and/or Training for Observation

- a. Obtain the licensee's schedule of EP drills and training evolutions identified as DEP and ERO Drill PI opportunities.
- b. Inspect as a minimum one EP drill, and some combination of two EP drills and/or simulator-based licensed operator requalification training (LORT) evolutions involving shift operating crews (total of three samples).
- c. Observation of drill and training evolutions may be performed unannounced.

Note: The licensee is not required to include simulator-based LORT training evolutions in DEP PI opportunities. Additionally, the licensee may wish to collect "as found" operator proficiency information. There is no intent to disrupt ongoing operator qualification programs.

- d. Review the selected drill/training evolution scenario to identify the timing and location of classification, notification and PAR development activities and licensee expectations of a successful response. If the scenario is a hostile action event, the inspector should review the requirements of 10 CFR 50.54 (hh)(1) and (2).

Note: Refer to NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Section 2.4, Emergency Preparedness Cornerstone, ERO Drill Participation, Clarifying Notes, to understand how drills and training evolutions qualify as performance enhancing experiences. Determine whether the drill/training evolution qualifies to be included in the DEP (and ERO) PI statistics.

- e. Review the Emergency Plan Implementing Procedures (EIPs) that provide instructions for classification, notification, dose assessment, and PAR development activities, to develop an understanding of the criteria for timely and accurate completion of these activities based on the EIPs, the scenario, and NEI 99-02.

03.02 Drill/Training Evolution Observation.

- a. Review checklists and forms used for classification, notification and PAR development activities.

Note: The licensee has demonstrated the capability to make a notification in 15 minutes if offsite response organizations identified in the E-plan receive notification of, at a minimum, the declared emergency classification level within 15 minutes of declaration. The licensee's critique should identify any delay occurred in making a notification to one or more OROs (e.g., an ORO cannot be reached). Any notification

delay that was under the control of the licensee to foresee and prevent (e.g., telephone call lists not kept up-to-date) should be evaluated as a failure to comply and assessed for significance. .

- b. Identify any weaknesses in licensee performance of classification, notification, PAR development and other observed EP areas and activities (See IP 71114.01, Attachment 2 “Prioritization of Additional Areas for Inspection”). Inspector identified weaknesses must be held confidential until after the licensee’s formal critique.

Note: Prompting of drill participants is not a finding under the assessment process because it represents no risk significance in itself. However, prompting related to a DEP PI opportunity is basis for failing a DEP PI opportunity and should be documented when observed.

### 03.03 Licensee’s EP Drill/Training Evolution Formal Critique Observation

- a. Determine if the licensee critique identified all weaknesses observed by the inspector.
- b. Licensee critique failures are to be documented and assessed for significance.
- c. Determine if the licensee properly identifies failures in classification, notification and PAR development activities.
- d. Verify that licensee identified weaknesses are entered into the CAP in a manner to allow NRC review of the resolution in the future.

Note: Poor performance in a drill is not a regulatory issue if the licensee corrects the performance issue or enters it into its CAP. The DEP PI captures performance failures and unless the PI falls below the “green band” threshold then correction of drill performance problems are in the licensee response band. However, if the PI falls below this threshold, increased NRC involvement is warranted.

Note: PI opportunities to be counted in the DEP PI quarterly report are at the discretion of the licensee and must be identified in advance and cannot be removed from the count due to poor performance.

### 03.04 Identify Recurring Weaknesses

- a. Use previous drill and training critiques to determine if previously identified weaknesses represent a trend or repeat (i.e., recurring, with the same or similar cause) of a weakness.

- b. Review specific corrective actions identified for the previous weaknesses, as well as similar occurrences in response to actual events, drills, exercises and training evolutions
- c. Verify completion of associated corrective actions.
- d. Determine if there is a trend or repeat of a weakness. Verify the licensee identified the trend or repeat weakness and entered it into the corrective action system.
- e. Consider the status of the DEP PI as well as the status of the relevant RSPS components of the DEP PI.

### 03.05 Identify Failures to Comply with Regulatory Requirements

- a. Evaluate any noted program element issues related to the effectiveness and adequacy of the E-Plan, or its implementing procedures<sup>1</sup>, observed during the drill and or training as an apparent failure to comply with the associated 10 CFR 50.47(b) planning standards and Appendix E requirements. Assess significance in accordance with the EP SDP.

For example, an ERO field monitoring team is unable to perform a survey because of ineffective/inadequate survey procedures or equipment. Such issues, whether identified by the licensee or inspector, are not treated as weaknesses, which are defined as deficiencies in ERO performance. The inspector should:

1. Review the history of identified issue(s) to obtain relevant information.
2. Determine, immediately if possible, if the program no longer meets the applicable planning standard. If this cannot be accomplished immediately, confer with regional management for direction.

### 03.06 Assessment of Licensee Performance Indicator Accuracy

- a. Determine if the licensee's assessment of PI opportunity performance is accurate.
- b. Determine if the licensee is properly dispositioning failures in classification, notification and PAR development activities with regard to PI statistics.
- c. Refer any discrepancies to regional management and HQ NSIR/DPR.

<sup>1</sup> The E-plan contains the licensee's commitments to NRC regulations. The implementing procedures are the licensee's methods of implementing those commitments and may be used to judge effective, timely, and accurate implementation.

71114.06-04      RESOURCE ESTIMATE

The direct inspection effort is estimated to be, on average, between 9 hours and 20 hours per year, regardless of the number of reactor units at a site.

71114.06-05      PROCEDURE COMPLETION

Inspection of the minimum sample size will constitute completion of this procedure in the Reactor Programs System (RPS). That minimum sample size consists of 3 samples representing inspector observation of 1 EP drill and 2 additional drills and/or training evolutions.

| 71114.06-06      REFERENCES

| NEI 06-04 "Conducting a Hostile Action-based Emergency Response Drill"  
| (ML073100460)

| IN 07-12 Tactical Communications Interoperability Between Nuclear Power Reactor  
| Licensees And First Responders (ML070710233)

| IN 09-19 Hostile Action-Based Emergency Preparedness Drills (ML092250360)

| RIS 06-12 Endorsement of NEI Guidance "Enhancements To Emergency  
| Preparedness Programs For Hostile Action" (ML061530290)

| RIS 2008-08 Endorsement Of Revision 1 To NEI Guidance Document NEI 06-04,  
| "Conducting A Hostile Action-Based Emergency Response Drill"

END

ATTACHMENT 1

Revision History For IP 71114.06

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	10/25/06	Completed four-year historical CN search.	N/A	N/A	N/A
N/A	10/25/06 CN 06-029	Minor wording changes to clarify that the EP cornerstone licensee response band is established by the PI system and the licensee's corrective action program, the importance of the formal critique process to identify EP weaknesses, and that this inspection activity is associated with planning standard 10 CFR 50.47(b)(14).	No	N/A	ML061790139

N/A	XX/XX/XX CN XX-XX	<p>Added:</p> <ul style="list-style-type: none"> <li>• “Reference” section</li> <li>• To Inspection Requirement 02.02 guidance to use the review DEP PI individual inputs for degraded performance and/or adverse trends to ensure areas of weakness are observed</li> <li>• Inspection Requirements 02.04 to identify recurring weaknesses and 02.05 to identify failures to comply with regulatory requirements and corresponding guidance sections</li> <li>• To guidance section 03.01 information stating if the scenario is a hostile action event, the inspector should review the requirements of 10 CFR 50.54 (hh)(1) and (2).</li> </ul>	Provided at EP Face to Face counterpart meeting	09/09/2011	
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