

NRC INSPECTION MANUAL

DIRS

Change Notice 12-008

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<u>Number</u>	<u>Date</u>		<u>Number</u>	<u>Date</u>
1.	IP 71114	06/29/06	IP 71114	05/29/12
2.	IP 71114.01	06/29/06	IP 71114.01	05/29/12
3.	IP 71114.02	12/07/09	IP 71114.02	05/29/12
4.	IP 71114.03	08/24/07	IP 71114.03	05/29/12
5.	IP 71114.05	10/25/06	IP 71114.05	05/29/12
6.	IP 71114.06	10/25/06	IP 71114.06	05/29/12
7.	IP 71114.07	12/02/09	IP 71114.07	05/29/12

TRAINING: Provided at EP Counterpart Meeting September 6- 9, 2011

REMARKS: IP 71114, "Reactor Safety – Emergency Preparedness," has been revised to reflect some aspects of the final EP rulemaking, add new procedure in Attachment 08, Increase priority ranking for evaluation of EP facilities and equipment, and clarify language regarding weaknesses. Added Inspection Requirement 02.05 to address 10 CFR 50, Appendix E, Section IV.F.2 (challenging drills and exercises) requirement for each licensee to conduct a hostile action exercise no later than December 31, 2015 and that the first eight-year exercise cycle will begin in the calendar year of the first hostile action exercise. Added new section title of "Inspection Resource Planning" to Inspection Guidance section. Added Attachments 1 and 2.

IP 71114.01, "Exercise Evaluation," has revised text that has been annotated only to show new or amended technical positions; editorial or formatting changes are not highlighted. A complete re-write of document structure to better align it with MC 0040, reduce material properly covered elsewhere, broke up large paragraph blocks into subparagraphs, transferred in guidance on critiques and identification of weaknesses from EP SDP that is better served in the IP. Removed "Inspection Bases" in accordance with IMC 0040, "Preparing, Revising and Issuing Documents for the NRC Inspection Manual" formatting expectations.

Changes made to address final EP rulemaking including: scenario review per new attachment 71114.08; reference to ISG for classification timeliness; and included backup and alternate facilities to ERF review guidance. Revised discussion on prompting and changed phrase to coaching. Corrected text that implied that only RSPS weaknesses warranted discussion and added new inspection requirement 02.04 and guidance section 03.04 to include, "If the exercise scenario contains demonstration of strategies, procedures, and or guidance developed under § 50.54(hh)(2) observe and evaluate the implementation of these activities." Trimmed 03.06 to remove guidance on how to process a failure to comply—covered in EP SDP. Expanded shortened citation of IV.F.2.f to restore text needed to understand scope. Added section 71114.01-05 "RERERENCE", and added Attachment 1.

IP 71114.02, "Alert and Notification System Evaluation," has been revised to include changes in inspection requirements and guidance, pertaining to FEMA-approved siren system design report and evaluation of back-up means of notifications for non-siren ANS systems. Also revised the number of hours allowed for inspection, per ROP Re-alignment review, 2009, and changed agency reference from DHS to FEMA. Added Inspection Requirement 02.04 and guidance section 03.04 to address the new EP rule requirements for backup ANS capability, as well as Section 71114.02-05 "References," and removed "Inspection Bases" in accordance with IMC 0040 "Preparing, Revising and Issuing Documents for the NRC Inspection Manual" formatting expectations.

IP 71114.03, "Emergency Response Organization Staffing and Augmentation System," has been revised to reflect the final EP rulemaking with regard to alternative facilities and on-shift multiple responsibilities (staffing analysis). Added guidance on augmentation timing start and stop, and made editorial changes to §03.01.c and §03.02.c to relocate some guidance to be in the proper section. Included editorial changes to clarify use of "weakness" in §03.02.d (weaknesses are observed only in drills and exercises), and added new §03.06. Other editorial changes for clarity, and removed "Inspection Bases" in accordance with IMC 0040 "Preparing, Revising and Issuing Documents for the NRC Inspection Manual" formatting expectations.

IP 71114.05, "Maintenance of Emergency Preparedness," was revised to change Problem Identification & Resolution (PI&R) references to Corrective Action Program (CAP). Remove "Inspection Bases" in accordance with IMC 0040 "Preparing, Revising and Issuing Documents for the NRC Inspection Manual" formatting expectations. Added a "Reference" section, and reformatted the "Inspection Requirements" section to align with "Inspection Guidance" section of MC 0040 "Preparing, Revising, and Issuing Documents for the NRC Inspection Manual." Added inspection requirements and corresponding guidance sections: 02.08 Review Letters of Agreement and/or Memorandums of Understanding (LOA/MOU) that support the E-plan, 02.09 Review 10 CFR 50.54(q) plan change process and practice, 02.10 Review licensee maintenance of equipment important to emergency preparedness, 02.11 Review licensee record(s) of evacuation time estimate (ETE) population evaluation, 02.12 Review licensee E-plan provisions for, and implementation of, primary, backup and alternate

emergency response facility. In addition, deleted the “Level of Effort” section; as it is no longer in MC 0040.

IP 71114.06, “Drill Evaluation,” was revised to add a “Reference” section, and to Inspection Requirement 02.01, “The inspection sample should include, to the extent possible, all types of scenarios (e.g. 10 CFR 50.54(hh)(1) & (2), radioactive release, no release, etc).” 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. If the last Hostile Action Base (HAB) evaluated exercise was greater than 8yrs ago, request the licensee to demonstrate the emergency preparedness support for the next Force-on-Force drill or exercise. In Inspection Requirements 02.04, to identify recurring weaknesses and 02.05 to identify failures to comply with regulatory requirements and corresponding guidance sections. 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). Added Attachment 1 “Prioritization of Additional Areas for Inspection,” and removed “Inspection Bases” in accordance with IMC 0040 “Preparing, Revising and Issuing Documents for the NRC Inspection Manual” formatting expectations.

IP 71114.07, “Exercise Evaluation – Hostile Action Event,” is a new procedure.

DISTRIBUTION: Standard

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