

Kahler, Carolyn

From: EPFAQ Resource
Sent: Thursday, October 18, 2012 5:07 PM
To: 'MTH@nei.org'
Cc: Wray, Roxanne
Subject: Acceptance of EPFAQ No. 2012-007

Dear Mr. Hug:

Thank you for your recent submission of EPFAQ No. 2012-007, "NSIR/DPR-ISG-01 section IV.G, Challenging Drills and Exercises, page 30 and 31 states: "All ERO teams (not necessarily each individual) shall be provided the opportunity to develop and maintain key emergency response skills within the scope of their duties during each exercise cycle..."

At this time, your comment has been accepted for review by appropriate U.S. NRC staff. You will be notified via email when EPFAQ No. 2012-007 has been added to www.regulations.gov for a 30-day public comment period. At that time, the ADAMS accession number and Federal Register Notice docket number will be provided for your reference.

To track the status of your submitted question, please visit the website <http://www.nrc.gov/about-nrc/emerg-preparedness/faq/faq-contactus.html#status>. If you have any questions regarding submitting an EP FAQ, please feel free to contact me at carolyn.kahler@nrc.gov or 301-415-0705.

Sincerely,

Carolyn J. Kahler

Communications and Outreach
Office of Nuclear Security and Incident Response
US Nuclear Regulatory Commission
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-----Original Message-----

From: MTH@nei.org [mailto:MTH@nei.org]
Sent: Tuesday, October 16, 2012 4:03 PM
To: EPFAQ Resource
Subject: Response from "Submit a Question about Emergency Preparedness"

Below is the result of your feedback form. It was submitted by

(MTH@nei.org) on Tuesday, October 16, 2012 at 16:03:15

relevant-guidance: NSIR/DPR-ISG-01, Interim Staff Guidance, Emergency Planning for Nuclear Power Plants

revision-number: 0

applicable-sections: Section IV.G, Challenging Drills and Exercises

comments: NSIR/DPR-ISG-01 section IV.G, Challenging Drills and Exercises, page 30 and 31 states:

“All ERO teams (not necessarily each individual) shall be provided the opportunity to develop and maintain key emergency response skills within the scope of their duties during each exercise cycle. Additionally, the ERO (not necessarily each ERO team) shall be provided the opportunity to demonstrate key skills in response to the following scenario elements in drills or exercises during each exercise cycle. Drills are considered to be performance-enhancing experiences (exercises, drills, functional drills, tabletop drills, mini-drills, etc.) that reasonably simulate the interactions between appropriate ERFs and/or individuals that would be expected to occur during emergencies....

- Response to essentially 100 percent of initiating conditions identified in the site emergency plan implementing procedure for classification of emergencies.”

Licenses typically use a range of methods for developing proficiency and evaluating the performance of personnel. Methods such as Job Performance Measures (JPMs), Task Performance Evaluations (TPE), Out of the Box Evaluations (OBE), etc. are used routinely in accredited training programs to evaluate an individual’s ability to perform technical, complex and/or time critical tasks under conditions reasonably simulating the conditions normally experienced during performance of the actual task or job. These evaluations are administered, evaluated and critiqued with the rigor required of an accredited nuclear training program to include being used in the administration of NRC initial licensed operator exams. The guidance as written does not clearly include or exclude the use of these evaluation tools as performance enhancing experiences. Additionally, the guidance does not address whether the drills used to demonstrate “Response to essentially 100 percent of initiating conditions identified in the site emergency plan implementing procedure for classification of emergencies” must be included in the Drill and Exercise Performance (DEP) indicator.

proposed-solution: Any classification opportunity that counts for DEP performance indicator credit satisfies the cyclic demonstration provision of NSIR/DPR-ISG-01 section IV.G regarding “[r]esponse to essentially 100 percent of initiating conditions identified in the site emergency plan implementing procedure for classification of emergencies.” In addition, a performance evaluation tool such as a JPM, TPE, OBE, etc., which would not be credited for the DEP performance indicator, may be used to satisfy this cyclic demonstration provision as long as it is a performance-enhancing experience that reasonably simulate the interactions between individuals in an ERF that would be expected to occur during emergencies.

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organization: Nuclear Energy Institute (NEI)

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