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## INSPECTION PROCEDURE 82401

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### DECOMMISSIONING EMERGENCY PREPAREDNESS SCENARIO REVIEW AND EXERCISE EVALUATION

PROGRAM APPLICABILITY: 2561

#### 82401-01 INSPECTION OBJECTIVE

To evaluate the adequacy of the licensee's conduct of the biennial exercise and its capability to assess performance via a formal critique process in order to identify and correct weaknesses associated with planning standard 10 CFR 50.47(b)(14).

This inspection procedure is applicable to nuclear power reactor licensee site(s) that are permanently shut down in accordance with 10 CFR 50.82(a) and is / are not located on a site with an operating nuclear power reactor. Decommissioning power reactor licensees retain their Part 50 or Part 52 license after permanent shutdown and remain subject to the same emergency preparedness (EP) requirements as operating power reactors until an exemption request is submitted and approved by the U.S. Nuclear Regulatory Commission (NRC). The exemption must then be appropriately implemented in the licensee's emergency response plan before compliance with the given regulation is no longer required. NSIR/DPR-ISG-02 "Interim Staff Guidance Emergency Planning Exemption Requests For Decommissioning Nuclear Power Plants," provides guidance for processing exemptions to the EP requirements for nuclear power reactors that are undergoing the process of decommissioning, previously approved exemption request(s), the rationale for the approval and the approximate time table for exemption approvals. Inspectors should review this document for information as to what exemptions could be expected for a given licensee's point in the decommissioning process. This procedure is not applicable to sites at which all fuel is removed from the spent fuel pool (SFP) and placed in dry cask storage.

#### 82401-02 INSPECTION REQUIREMENTS

02.01 Ensure the scenario provides sufficient opportunities to demonstrate the licensee's capability to perform key skills in principle functional areas to protect public health and safety. Scenario review inspection guidance is provided in Attachment 1 of this procedure.

[10 CFR Part 50, Appendix E, IV.F.2.a, b, i & j]

02.02 Evaluate the adequacy of the licensee's conduct of the biennial exercise and ability to assess performance via a formal critique to identify and correct weaknesses. Emphasis should be placed on licensee assessment of classification, notification, dose assessment activities and protective action recommendation (PAR) development, but inspectors may evaluate as many other aspects of performance and the associated critiques as resources allow. Exercise evaluation inspection guidance is provided in Attachment 2 of this procedure. [10 CFR Part 50.47(b)(14) Appendix E, IV.F.2.a, b, d, e, f, g, i & j]

## 82401-03      INSPECTION GUIDANCE

### General Guidance

Consistent with previous exemption requests made by past licensees in the decommissioning process, the staff requires the licensee to submit an analysis providing sufficient assurance that no postulated offsite radiological release would exceed the Environmental Protection Agency (EPA) protective action guidelines (PAG) at the site boundary, or there is sufficient time to take appropriate mitigating actions to preclude an offsite radiological release from exceeding EPA PAGs at the site boundary prior to recommending approval of the exemption from the EP requirement(s). Bracketed regulatory citations mark the portions of this inspection procedure affected by previously approved licensee exemption requests.

As the licensee applies for and receives approval for relief from the regulatory requirements of 10 CFR 50.47, Appendix E and/or the commitments contained in their emergency response plan, the scope of this inspection will need to be modified to inspect the emergency plan as changed in accordance with the appropriate incorporation of the approved exemption request(s). The inspectors should review the approved exemption request(s) then compare them to the inspection procedure steps to determine what portions of the step may be deleted or if the whole step may be deleted.

Inspection approaches different from those described in the inspection procedure guidance are acceptable if they meet the inspection requirements and provide a basis for the inspector to make the determinations required.

## 82401-04      RESOURCE ESTIMATE

Recommended average annual inspection hour efforts for the attachments of this inspection procedure are listed below. Actual inspection hours will be expected to move toward the lower end of the range as exemptions are submitted and approved.

- Attachment 1      between 12 and 16 hours
- Attachment 2      between 54 and 74 hours

82401-05      PROCEDURE COMPLETION

This procedure is considered complete when all the inspection requirements listed in the procedure have been satisfied, except for inspection requirements edited based on approved and implemented exemptions from NRC requirements. For the purpose of reporting completion in the Reactor Program System (RPS), the sample size is defined as one (1). The inspector shall ensure that a sample size of one (1) is reported in the RPS, Item Reporting (IR), and completion noted in the RPS, Inspection Planning (IP), when the procedure is completed in its entirety.

82401-06      REFERENCES

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

Order EA-02-026, "Order for Interim Safeguards and Security Compensatory Measures," February 25, 2002.

SECY-03-0165, "Evaluation of Nuclear Power Reactor Emergency Preparedness Planning Basis Adequacy in the Post-9/11 Threat Environment," September 22, 2003.

RG 1.214, "Response Strategies for Potential Aircraft Threats," September 2009.

NEI 06-04, "Conducting a Hostile Action-based Emergency Response Drill" Rev. 2, Appendix A, "Drill and Exercise Objectives" (ML112091915).

Information Notice 85–80, "Timely Declaration of an Emergency Class, Implementation of an Emergency Plan, and Emergency Notifications,"

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"

END

## ATTACHMENT 1

### EXERCISE EVALUATION – SCENARIO REVIEW

#### 01.00 INSPECTION REQUIREMENTS

Note: Licensees may structure exercise scenario packages differently and this should be found acceptable, provided that the exercise, as conducted, will meet the requirements of 10 CFR Part 50, Appendix E, § IV.F.2, and the facility E-Plan.

01.01 Verify the submitted scenario package is submitted at least 60 days before the scheduled exercise date. [10 CFR Part 50, Appendix E, IV.F.2.a & b]

01.02 Verify the scenario has required minimum exercise elements.

01.03 Evaluate the ability of the scenario to provide opportunities for the emergency response organization (ERO) to demonstrate proficiency in key skills necessary to implement the principle functional areas of emergency response, including those skills specific to emergency response duties in the control room, technical support center (TSC), onsite support center (OSC), emergency operations facility (EOF), and joint information center (JIC)/joint information system (JIS). [10 CFR Part 50, Appendix E, IV.F.2.j]

01.04 Submit and review scenario comments with FEMA representative to ensure that scenario comments are consistent. Provide any exercise comments, questions or concerns to the licensee no later than 30 days prior to the scheduled exercise date.

#### 02.00 INSPECTION GUIDANCE

02.01 Verify scenario submittal is complete. Completeness may be indicated by including exercise objectives that support demonstration of key skills in principle functional areas, a timeline of exercise events, a description of imbedded drills, a description of key injects and messages, the expected ERO and offsite response organization (ORO) participation, and plant and player safety considerations. [10 CFR Part 50, Appendix E, IV.F.2.a & b]

Note: Exhibit 1 “Scenario Review Checklist” is a tool to review the scenarios.

Note: Scenarios are submitted per 10 CFR § 50.4. The document is entered into Agencywide Documents Access and Management System (ADAMS) by the Document Control Desk as not publicly available. Confidentiality of the scenario shall be maintained and a Sensitive Unclassified Non-Safeguards Information (SUNSI) review (for purposes of making the document public) shall not be performed until after completion of the exercise. The SUNSI review is performed by a Subject Matter Expert (e.g., a member of the NRC EP staff or the Project Manager for the specific site). Licensees may include a cover page with wording similar to the following: “This document’s availability should be controlled as non-public to ensure

confidentiality from exercise responders until the conduct of the exercise is concluded.” After completion of the exercise and following a SUNSI review, the cover page may be removed or redacted, the file version updated in ADAMS and the document may be made publicly available, as determined by the SUNSI review. If a Freedom of Information Act (FOIA) request is submitted prior to the exercise date, notify NRC headquarters (HQ) and refer to ML12158A329 for disposition of the public release of the scenario.

02.02 Review the scenario submittal for the following:

- a. The minimum expected exercise elements are included in the scenario.

	<b>Element Description</b>	<b>Reference in guidance documents</b>
1	Accident detection and assessment	NUREG-0654: I.1, I.2
2	Emergency classification	NUREG-0654: D.1, D.2
3	Notification of onsite and offsite emergency responders	NUREG-0654: E.1, E.2, E.3, J.1
4	Communications	NUREG-0654: F.1, F.2, E.2, E.4, H.6
		NUREG-0737, Supp 1: 8.1, 8.2, 8.3, 8.4
5	Radiological exposure control	NUREG-0654: K.1, K.2, K.3, K.5, K.6, J.3, J.6
6	Protective action recommendations	NUREG-0654: J.7
7	Staff augmentation	NUREG-0654: A.1, A.3, A.4, B.7, B.8, B.9
8	Shift staffing	NUREG-0654: B.1, B.2, B.3, B.5, Table 2

- b. The scenario is sufficiently varied from those used in the last two years of biennial exercises, off-year exercise(s), integrated response facility drills etc. [10 CFR Part 50, Appendix E, IV.F.2.i]
- c. ERO pre-conditioning is avoided to minimize anticipatory responses.
- d. To the extent possible, scenario and exercise play requires the ERO “earn” event information.

Note: Technical evaluations of the scenario data and exercise control are the responsibility of the licensee. Review and verification of technical details such as, engineering operational parameters, engineering logic, source term, radiological instrumentation data, plant parameter units and data/injects provided by controllers is the responsibility of the licensee. Problems with the licensee’s review and verification may be revealed during the exercise or its critique. The inspector should only evaluate the scenario for its relative credibility and timing of events.

02.03 Evaluate the ability of the scenario to provide opportunities for the ERO to demonstrate proficiency in key skills by ensuring:

- a. Opportunities for the ERO to perform their key skills as applicable to their emergency response duties in the TSC, OSC, EOF, and JIC/JIS are provided. [10 CFR Part 50 Appendix E.IV.F.2.j]

- b. Scenario data and progression of events are credible, logical, and challenging. The demands of the onsite and offsite exercise objectives will likely preclude complete fidelity between the scenario and the actual ERO response. The inspector will need to use judgment, based on experience, in performing this review. Examples of items to consider include:
1. Exercise play should be consistent with all simulated events or conditions.
  2. If the spent fuel is simulated as being damaged, the corresponding in-plant radiation levels should increase comparably.
  3. If a loss of AC power source is simulated, equipment and instrumentation that relies on that source should not be considered operable.
  4. A release should not be simulated as being stopped until the cause of the release has been corrected or mitigated.
  5. Simulated releases should not begin before the failures that cause the release to occur.
  6. Simulated field monitoring data should be consistent with simulated wind directions and plume transit times (e.g., the dose rate increases after the plume reaches that point).
  7. The timing of scenario events should be comparable with the time it would take the ERO to perform particular tasks under actual emergency conditions (e.g., time spent obtaining an RWP, getting a work briefing, donning personal protective equipment, obtaining tools and parts, etc.).
- c. In addition to the above, hostile action-based (HAB) scenarios should be reviewed for the following considerations: [10 CFR Part 50 Appendix E, IV.F.2.j]

Note: 10 CFR Part 50 does not specify a frequency for the conduct of the HAB exercise during the eight year exercise cycle. It is the expectation of the NRC that licensees not plan a HAB exercise at the beginning of an exercise cycle and wait to the end of the next exercise cycle to conduct their next HAB exercise.

1. Two consecutive HAB exercises should not be “no or minimal radiological release” scenarios.
2. Mitigative measures should commence after the simulated active attack has ceased but before Local Law Enforcement Agencies (LLEA) have swept the site for safe entry or declared the site secure. Securing the site may take days, and it is important that licensees train personnel to respond in the aftermath of HAB events. Licensees shall demonstrate planning for and prioritization of mitigative action teams and protection of team personnel in efforts to prevent a radiological release.

3. The planning necessary to conduct a HAB exercise will challenge expectations for scenario confidentiality. For example, a drill or practice exercise involving a HAB scenario may be conducted prior to the biennial exercise. In addition, prior reviews and approvals by various site personnel and OROs may be needed to involve offsite responders and other resources normally associated with HAB response. Although some ERO members may infer that a HAB scenario will be used in the biennial exercise, participants should not have knowledge of scenario details (e.g., specific events, timelines, or related information). Scenarios used for HAB exercises must be sufficiently different from those used in drills/exercises during the previous 2 years. Specifically, the elements and consequences of the HAB must be varied (e.g., attack type or direction, number of attackers, attack timeline, damage, casualties and offsite consequences). Provided that the above requirements are met, it is acceptable for the same ERO members to participate in HAB drills or practice exercises and the subsequent biennial exercise.
  4. Verify scenario objectives include HAB elements. Refer to NEI 06-04, "Conducting a Hostile Action-based Emergency Response Drill" Rev. 2, Appendix A, "Drill and Exercise Objectives" for acceptable exercise objectives.
- d. Review the scenario against the licensee's records/schedule for scenario elements performed and required to be demonstrated during the exercise cycle.

	Element Description	Reference in guidance documents
1	Hostile Action Based	ISG: N.1.b.i. [10 CFR 50 Appendix E, IV.F.2.j]
2	An initial classification of, or rapid escalation to, a Site Area Emergency (SAE) or General Emergency (GE)	ISG: N.1.b.ii [10 CFR 50 Appendix E, IV.F.2.j]
3	No radiological release or an unplanned minimal radiological release that requires the site to declare a SAE, but does not require declaration of a GE	ISG: N.1.b.iii [10 CFR 50 Appendix E, IV.F.2.j]
4	Off-hours staffing (6 p.m. to 4 a.m.)	ISG: N.1.c [10 CFR 50 Appendix E, IV.F.2.j]
5	Activation of emergency news center (Joint Information Center)	NUREG-0654: G.3, G.4
6	Use of fire control teams	NUREG-0654: N.2.b, 0.4.d
7	Use of first aid and/or rescue teams	NUREG-0654: K.1, K.2, K.3, K.4, K.5, L.2, O.4.f
8	Use of medical support personnel	NUREG-0654: N.2.c, L.1, L.4, O.4.h
9	Use of licensee's headquarters support personnel	NUREG-0654: O.4.i

10	Use of security personnel to provide prompt access for emergency equipment and support	NUREG-0654: O.4.d
11	Use of backup communications	NUREG-0654: F.1
12	Rumor control	NUREG-0654: G.4.c
13	Use of emergency power (where a part of plant safety systems, e.g. TSC)	NUREG-0737, Supp. 1: 8.2.1
14	Evacuation of Emergency Response Facilities (ERFs) and relocation to backup ERFs, where applicable	NUREG-0654: J.10.g
15	Ingestion pathway exercise, when necessary to support state exercise requirements	NUREG-0654: J.9, J.11
16	Field monitoring, including soil, vegetation, and water sampling	NUREG-0654: I.7, I.8, I.11, N.2.d
17	Capability for determining the magnitude and impact of the particular components of a release	NUREG-0654: I.3, I.4, I.6, I.8, I.9, I.10
18	Capability for post-accident coolant sampling and analysis.	NUREG-0654: I.2

02.04 Contact the Regional State Liaison Officer to submit and review any scenario comments to the Regional Assistance Committee Chair. Comments about the scenario should have a regulatory basis. Comments, questions, or concerns should be provided to the licensee no later than 30 days prior to the scheduled exercise date.

END

Exhibit: Scenario Review Checklist

Exhibit 1 - Scenario Review Checklist

1. Verify the scenario submittal is complete by including:	Notes
a. Exercise objectives that support demonstration of key skills in principle functional areas.	
b. A timeline of exercise events	
c. A description of any imbedded drills.	
d. A description of key injects and messages.	
e. The expected ERO and ORO participation.	[10 CFR 50 Appendix E, IV.F.2.a, c, d & e]
f. Plant and player safety considerations.	
2. Review the scenario for the following:	
a. Verify scenario contains minimum expected elements:	
1. Event classification.	
2. Timely notification of offsite authorities.	
3. PAR development (development of PARs involving public evacuation or sheltering is required only in exercises that include a General Emergency).	[10 CFR 50.47(b)(10)]
4. Radiological assessment.	[10 CFR 50.47(b)(9)]
5. Shift staff response to accident transients or other events that meet EAL criteria while implementing the emergency plan.	
6. ERO response and ERF activation following declared emergencies	
7. Integration of licensee response with OROs to include briefings, coordination of worker protection, and, as appropriate to the scenario, coordination of public protective actions radiological release monitoring, and offsite response to the site.	
8. Communications between onsite and offsite ERFs.	[10 CFR 50 Appendix E, IV.F.2.a, c, d & e]
9. Dissemination of information to the public via media channels and press briefings.	

10. Development and implementation of radiological or physical protection (i.e., in response to HAB) protective actions for onsite workers as appropriate to the scenario.	[10 CFR 50 Appendix E, IV. & I]
11. Operational and engineering assessment of accident sequences.	
12. Accident mitigation by simulated equipment repair. This must include mechanical, electrical, and/or instrumentation and control activities. The scenario should allow some repairs to be successful, but must provide the opportunities to demonstrate mitigation planning, repair execution and radiological control support of repair teams.	
b. The scenario is sufficiently varied from the last biennial exercise, and any off-year exercise(s), integrated response facility drill, etc. used in preparation for this exercise by ensuring that:	[10 CFR 50 Appendix E, IV.F.2.j]
1. No more than one EAL is common to the previous exercise or any practice drills/exercises.	[10 CFR 50 Appendix E, IV.F.2.j]
2. Failure mechanisms used for reaching initiating conditions and the failed equipment is varied to the extent practical.	[10 CFR 50 Appendix E, IV.F.2.j]
3. The exercise scenario has not been used as a practice drill for the present biennial exercise.	[10 CFR 50 Appendix E, IV.F.2.j]
c. That ERO pre-conditioning is avoided by ensuring scenario timeline and/or initial conditions do not provide obvious clues of impending equipment or system failures.	
d. To the extent possible, scenario and exercise play requires the ERO "earn" event information.	
<b>3. Evaluate the ability of the scenario to provide opportunities for the ERO to demonstrate proficiency in key skills by ensuring:</b>	
a. Opportunities provided during drill and/or exercise to develop and maintain key emergency response skills as follows:	
1. Demonstration of all functions in each ERF (e.g., all ERFs that are responsible for dose assessment perform those duties in response to a radiological release).	[10 CFR 50 Appendix E, IV.F.2.j]

2.	The use of alternative facilities to stage the ERO for rapid activation during a HAB.	[10 CFR 50 Appendix E, IV.F.2.j]
3.	Real-time staffing of facilities during off-hours (i.e., 6:00 p.m. to 4:00 a.m.).	
4.	Provide medical care for injured, contaminated personnel (every two years).	
5.	Response to essentially 100% of EAL initiating conditions.	[10 CFR 50 Appendix E, IV.F.2.j]
6.	Response to actual industry event sequences appropriate for the nuclear plant technology (e.g., BWR or PWR).	[10 CFR 50 Appendix E, IV.F.2.j]
7.	All licensee ERO teams must be provided the opportunity to demonstrate key skills within the scope of their duties.	
8.	Use of procedures developed in response to an aircraft threat and in compliance with 10 CFR 50.54(hh)(1).	[10 CFR 50 Appendix E, IV.F.2.j]
9.	Use of the strategies associated with 10 CFR 50.54(hh)(2) to mitigate spent fuel pool damage scenarios (all strategies, such as makeup, spray, and leakage control, but not every variation of a given strategy).	[10 CFR 50 Appendix E, IV.F.2.j]
10.	Use of the strategies associated with 10 CFR 50.54(hh)(2) to mitigate reactor accidents and maintain containment (10 strategies for boiling water reactors and 7 strategies for pressurized water reactors, but not every variation of a given strategy).	[10 CFR 50 Appendix E, IV.F.2.j]
b.	Scenario data and progression of events are credible, logical and challenges the ERO to demonstrate their proficiency, particularly in accident assessment.	
c.	In addition to the above, HAB based scenarios should be reviewed for the following considerations:	[10 CFR 50 Appendix E, IV.F.2.j]
1.	HAB scenarios should vary the radiological release from exercise to exercise.	[10 CFR 50 Appendix E, IV.F.2.j]
2.	Mitigative measures should commence after the simulated active attack has ceased but before Local Law Enforcement Agencies (LLEA) have swept the site for safe entry or declared the site secure.	[10 CFR 50 Appendix E, IV.F.2.j]

<p>3. The planning necessary to conduct a HAB exercise will challenge expectations for scenario confidentiality. Scenarios used for HAB biennial exercises must be sufficiently different from those used in drills/exercises during the previous 2 years. Specifically, the elements and consequences of the HAB must be varied (e.g., attack type or direction, number of attackers, attack timeline, damage, casualties, offsite consequences, etc.). Provided that the above requirements are met, it is acceptable for the same ERO members to participate in HAB drills or practice exercises and the subsequent biennial exercise.</p>	<p>[10 CFR 50 Appendix E, IV.F.2.j]</p>
<p>4. Review HAB Scenario objectives for completeness. Refer to NEI 06-04, "Conducting a Hostile Action-based Emergency Response Drill" Rev. 2, Appendix A, "Drill and Exercise Objectives."</p>	<p>[10 CFR 50 Appendix E, IV.F.2.j]</p>
<p>d. Review records/schedule required for the eight year exercise scenario cycle to include:</p>	<p>[10 CFR Part 50 Appendix E, IV.F.2.j]</p>
<p>1. Response to HAB, including interface with LLEAs.</p>	<p>[10 CFR 50 Appendix E, IV.F.2.j]</p>
<p>2. Engineering assessment, repair plan development, and physical repair of critical equipment damaged by HAB after the active attack, but before the site is secured by LLEAs.</p>	<p>[10 CFR 50 Appendix E, IV.F.2.j]</p>
<p>3. Response to one scenario with no radiological release or an unplanned minimal radiological release that does not require evacuation or sheltering of the public.</p>	<p>[10 CFR 50 Appendix E, IV.F.2.j]</p>
<p>4. Response to a scenario with radiological releases that require evacuation and/or sheltering of the public.</p>	<p>[10 CFR 50 Appendix E, IV.F.2.j]</p>
<p>5. Response to a scenario that begins with a Site Area Emergency or General Emergency, or escalates rapidly (within 30 minutes) to an SAE or GE.</p>	<p>[10 CFR 50 Appendix E, IV.F.2.j]</p>
<p>6. Successful simulated repair of simulated damaged equipment to prevent or mitigate core damage, reactor vessel loss, and/or containment loss.</p>	<p>[10 CFR 50 Appendix E, IV.F.2.j]</p>
<p>7. Demonstration of the ability to mitigate an accident caused by HAB or other initiators, through the simulated use of equipment, procedures, and strategies developed in compliance with 10 CFR 50.54(hh)(2).</p>	<p>[10 CFR 50 Appendix E, IV.F.2.j]</p>

8. Demonstration of each of the licensee's site specific reactor technology or vintage at least once during the exercise cycle.	[10 CFR 50 Appendix E, IV.F.2.]
<b>4. Submit and review exercise scenario comments with FEMA. Provide any exercise comments, questions or concerns to the licensee no later than 30 days prior to the scheduled exercise date.</b>	

END

## ATTACHMENT 2

### BIENNIAL EXERCISE EVALUATION

#### 01.00 INSPECTION REQUIREMENTS

- 01.01 Prepare for the biennial exercise inspection. A biennial exercise is required for each licensee site, including each licensee at a co-located site.  
[10 CFR Part 50, Appendix E, IV.F.2.b]
- 01.02 Review weaknesses and corrective actions identified as a result of previous drill and exercise reports, beginning with the previous biennial exercise, and develop a list of performance areas to be observed during the exercise. Review, at a minimum, all previously identified classification, notification, dose assessment and protective action recommendations (PAR) corrective actions, evaluate and observe during the exercise as deemed needed.
- 01.03 Perform independent observations of licensee performance in classification, notification PAR development, dose assessment activities and as many other aspects of performance as resources allow. In the case of co-located licensees, verify licensee compliance with the requirements of 10 CFR 50, Appendix E, paragraph IV.F.2.c concerning the continuance of certain activities in the period between biennial exercises. [10 CFR Part 50.47(b)(4) and Appendix E, IV.C.1 & 2]
- 01.04 Hostile Action Based (HAB) Exercise Only - Perform independent observations of the licensee's abilities: to implement mitigative measures in response to a simulated attack on site; coordinate Security, Operations, Emergency Response Organization (ERO) and Offsite Response Organizations (ORO) required actions to successfully respond to and mitigate plant damage before Local Law Enforcement Agencies (LLEA) are able to declared the site secure. [10 CFR Part 50, Appendix E, IV.F.2.j]
- 01.05 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. [10 CFR Part 50, Appendix E, IV.F.2.j]
- 01.04 Evaluate the licensee's identification of weaknesses and identify any weaknesses observed by the inspection team not identified by the licensee's formal critique and/or not appropriately entered into the corrective action program.
- 01.05 Identify recurring weaknesses in similar activities since the previous biennial exercise in order to evaluate the effectiveness of corrective actions.
- 01.06 Identify weaknesses that reveal a violation of a regulatory requirement.
- 01.07 Evaluate the exercise to ensure the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency or HAB event environment if applicable.  
[10 CFR Part 50.47(b)(10) and Appendix E, IV.C.2, D.1, 3, F.2.j]

01.08 Represent the NRC at the Federal Emergency Management Agency (FEMA) public meeting.

01.09 Review the proposed offsite exercise deficiencies provided by FEMA and inform the licensee of those deficiencies.

## 02.00 INSPECTION GUIDANCE

The focus of this inspection is to evaluate the adequacy of the licensee's conduct of the biennial exercise and its ability to assess performance via a formal critique process in order to identify and correct weaknesses.

Emphasis should be placed on licensee assessment of classification, notification, dose assessment activities and PAR development and if a HAB event exercise to coordinate with offsite officials located at the Incident Command Post in the HAB event environment. Inspectors should evaluate as many other aspects of performance and the associated critique as resources allow. [10 CFR Part 50.47(b)(10), and Appendix E, IV.F.2.j]

02.01 Prepare for the Biennial Exercise Inspection.

- a. Review the scenario for a summary understanding, if not already done. Ensure a consistent pre-exercise understanding of the expected extent of exercise demonstration/simulation for classification, notification, dose assessment activities and PARs between the inspection team and the licensee. [10 CFR Part 50.47(b)(10)]
- b. Develop a plan to deploy inspection resources to observe classification, notification, dose assessment activities and PAR development. Review corrective actions for past identified weaknesses and/or adverse trends to help inform what specific areas should be observed. [10 CFR Part 50.47(b)(10) and Appendix E, IV.D.3]
- c. Consider the prioritization guidance in Attachment 5, "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.
- d. Include in the inspection plan for sites with co-located licensees, verification of the conduct, observation and, as appropriate, licensee critique of activities required by 10 CFR 50 Appendix E §IV.F.2.c to maintain interface with the affected State and local authorities and licensee. See RG 1.101, "Emergency Response." [10 CFR Part 50 Appendix E, IV.F.2.c]
- e. NRC inspectors do not evaluate offsite agency performance, but will rather focus on the interface of licensee personnel with offsite agencies. However, any observed offsite performance weaknesses that impact the licensee's ability to implement the onsite E-plan should be shared with the FEMA evaluation team for further assessment.

- f. Review the E-plan and Emergency Plan Implementing Procedures (EPIPs) that provide instructions for classification, notification PAR development and dose assessment activities, and other functional areas relevant to the exercise. Develop an understanding of the criteria for timely and accurate completion of these activities based on EPIPs and the scenario. Ensure that the emergency response plan (E-plan) and EPIPs contain criteria concerning protective actions for non-essential onsite personnel, including evacuation for Site Area Emergencies and General Emergencies. If the exercise scenario includes an aircraft attack review Fire Protection Triennial IP 71111.05T for additional guidance on expected licensee capabilities. [10 CFR Part 50.47(b)(10) and Appendix E, IV.D.3.]
- g. Familiarize yourself with the licensee's critique process and discuss expectations with the licensee. This familiarization should include the critique scheduling, content, and participation, as well as the inspector's need to know when the critique process is complete. The critique process is complete when all draft conclusions related to the identified weaknesses have been presented to licensee senior management, and any management questions or comments have been documented. The licensee should understand that the critique should not be delayed in order to address every minor problem identified.
- h. Schedule a briefing of the inspection team by licensee personnel before the exercise to discuss exercise content/conduct and any late scenario revisions. This is an opportunity to ask questions regarding the scenario, licensee expectations for judging classification, notification dose assessment activity and PAR success, logistics, mentor arrangements, shift changes, etc.

#### 02.02 Review Past Weaknesses and Corrective Actions.

- a. Review previously identified weaknesses and corrective actions from licensee drill/exercise reports, Quality Assurance (QA) audits, and NRC exercise inspection reports since the last biennial exercise. This action does not replace the review of corrective actions performed under IP 82501, but rather, is to identify weaknesses and corrective actions that can best be evaluated in the context of an emergency exercise as opposed to a program inspection.
- b. Include equipment and facility items or other areas thought to be appropriate in the sample of corrective actions identified for observation during the exercise.

#### 02.03 Perform Independent Observation of Licensee Performance.

- a. Observe licensee performance in classification, notification, dose assessment activities and PAR development and the other areas as selected. [10 CFR Part 50.47(b)(10)]

Note: The licensee has demonstrated the capability to make a notification in 15 minutes when the offsite response organizations (ORO) identified in the E-plan have received notification of, at a minimum, the declared emergency classification level within 15 minutes of declaration. The licensee's critique should identify any delay that occurred in making a notification to one or more OROs (e.g., an ORO cannot be reached). Any notification delay 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 potential violation. [Appendix E, IV.C.2 & D.3]

- b. HAB Exercise Only - Perform an evaluation of the licensee's planned range of protective actions to protect onsite personnel during a hostile action and the procedural guidance for onsite protective action decision making. The review should include the following elements: [10 CFR 50 Appendix E, IV.1& IV.I]
- Do onsite protective actions clearly distinguish between actions taken for a credible threat versus active hostile action? [10 CFR 50 Appendix E, IV.I]
  - Does the licensee have a decision making tool (e.g., procedure, logic charts, etc.) to aid the shift manager in rapidly determining the optimum protective action for onsite personnel during a hostile action? [10 CFR 50 Appendix E, IV.1& IV.I]
  - Does the range of protective actions include provisions for the following: [10 CFR 50.47(b)(10) and Appendix E, IV.1 & IV.I]
  - Evacuation of onsite personnel from target buildings?
  - Site evacuation by opening security gates while continuing to defend the gates?
  - Dispersal of licensed operators?
  - Sheltering of personnel in structures away from potential site targets?
  - Arrangements for accounting for personnel after the attack?
  - Is specific equipment, material, buildings or areas, readily available and in adequate quantity and condition to support the expected usage.
  - Is access to shelter structures readily available 24/7?
- c. HAB Exercise Only - In addition to the areas listed in 02.03a above, also observe prompt dispatch of liaisons to the ICP knowledgeable in plant operations, radiation protection, and plant security. Observe the following areas as resources permit: [10 CFR 50.47(b)(9),(10) and Appendix E, IV.I]

- Demonstration of the capabilities of site security to interface with the Emergency Operations Facility (EOF), Operational Support Center (OSC), Technical Support Center (TSC) and Control Room.
  - Support of and interface with an Incident Command Post (ICP) to facilitate the transfer of plant information and coordination of response activities.
  - The use of the alternative emergency response facilities for activation of the Emergency Response Organization (ERO), scenario dependent.
  - Actions taken to shelter personnel from armed attack or aircraft attack
  - Conduct of operations and repair activities during site conditions that prevent normal access due to fire, locked doors or security measures such as areas that have not yet been secured.
  - Rescue of and medical attention for significant numbers of personnel.
  - Prioritization and urgency (e.g. restore offsite power within 4 hours) of efforts to protect plant equipment or to secure access to plant areas for repairs.
  - Response coordination and site access established between on-shift personnel and ORO first responders.
  - Coordination and decision-making actions necessary for prompt mobilization or relocation of the ERO in a post-attack environment.
  - Protecting a minimum contingent of operations and maintenance personnel for recovery
- d. Gather copies of completed forms and checklists that support or document; classification, notification, dose assessment activities, PAR development and/or any other areas selected for inspection.
- e. Maintain inspector-identified weaknesses confidential until after the formal licensee critique is complete, including management review, before discussing inspector observations and conclusions.
- f. Identify occurrences of the prompting of exercise players that prevented the identification and correction of ERO performance weaknesses. Accordingly, the failure of the licensee to identify the weaknesses, which would have been identified if not for the prompting is a potential violation and should be evaluated. See Attachment 3.
- g. Evaluate the readiness of the emergency response facilities and equipment, including alternate and backup facilities to the extent feasible during the exercise.  
[10 CFR Part 50 Appendix E, IV.E.8.a.(i), (ii) & IV.F.2.j]

- h. Evaluate the ERF capability to staff, activate and perform assigned tasks during the exercise. The activation times for these facilities should be noted and evaluated against E-plan commitments.

Determine the licensee's commitments with regard to how the emergency response activation timeliness is assessed (e.g., when the "clock starts" and the "clock stops"). In the absence of an approved alternative, the NRC expects that the clock starts with the declaration of an Alert or higher emergency classification level and ends when the facility is ready to assume its assigned functions under the E-plan and relieve the on-shift staff of those functions. (Although the facility may be ready, the on-shift staff relief may be postponed in the interest of completing critical tasks prior to turnover.)

- i. Evaluate the capabilities of the primary (alternate and backup, as applicable) EOF against the requirements of 10 CFR Part 50 Appendix E §IV.E.8.c and the guidance in NSIR-DPR-ISG-01 §IV.I, "EOF—Performance-Based Approach" during performances of this attachment subsequent to June 20, 2012. Specifically the capability to: [10 CFR Part 50 Appendix E, IV.E.8.a.(i), (ii), (b), (c), (d) & IV.F.2.j]
  - 1. Analyze plant technical information.
  - 2. Provide technical briefings on event conditions.
  - 3. Provide technical briefings on event conditions and prognosis to other licensee ERO locations and offsite response organizations for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves.
  - 4. Obtain and display plant data and radiological information for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves.
  - 5. Analyze plant technical information.
  - 6. Support response to events occurring simultaneously at more than one nuclear power reactor site if the emergency operations facility serves more than one site.
- j. If the exercise scenario includes a demonstration of, or the exercise inspection week includes an out of sequence event demonstrating, 10 CFR 50.54(hh)(1) & (2) strategies, these events, to the extent possible, should be observed and evaluated. [10 CFR Part Appendix E, IV.F.2.j]

Note: The inspector is not expected to evaluate of the adequacy or regulatory compliance of the licensee's actions and / or procedures, only the licensee's implementation of their E-plan commitment(s) for the 50.54(hh)(2) strategy requirement.

02.04 Evaluate Licensee's Identification of Weaknesses.

- a. Evaluate the licensee's conduct of the critique process. Licensees perform critiques in many different ways and inspectors should be flexible in accepting mechanisms for weakness identification. In particular verify:
  1. That all weaknesses are captured and entered into a corrective action system with appropriate priority, regardless of whether the weakness was verbalized at a critique meeting, and in a manner that will allow NRC review of the resolution in the future (i.e., during subsequent biennial exercises). This is the critical feature of any critique.
  2. Insure that there is adequate evidence that all weaknesses will be entered into a corrective action system. If the inspector does not have adequate evidence that a weakness has or will be captured and entered into the corrective action system, the critique is not acceptable and a critique problem exists.
  3. Verify that weaknesses associated with classification, notification, PAR and dose assessment activities are given the highest priority in the critique processes, however, all weaknesses that could preclude effective implementation of the E-plan in an actual emergency are to be identified and corrected.  
[10 CFR Part 50.47(b)(9), (10) and Appendix E, IV.C.1, 2, 3, IV.D.2, 3]
- b. Observe, if feasible, the player self-assessments (e.g. "hot washes") in each of the emergency response facilities.
- c. Conduct a pre-critique briefing with the EP staff/management prior to the formal critique to discuss any non-exercise-related inspection observations/findings, and to obtain the licensee's preliminary critique of the exercise results. This meeting will aid the inspector in preparation for the formal exit meeting with licensee senior management (typically conducted following the formal critique).
  1. Do not share the NRC exercise observations at this meeting, even if they are consistent with the licensee's preliminary critique.
  2. Stress at this meeting that for inspection purposes, the formal critique should focus on weaknesses associated with a classification, notification, PAR and dose assessment activities however, all observed weaknesses are required to be entered into the corrective action system. The inspector should discuss any change in evaluation since the pre-critique discussion. The balance of the critique presentation is determined by the licensee's process.  
[10 CFR Part 50.47(b)(9), (10) and Appendix E, IV.C.1, 2, 3, IV.D.2, 3]
- d. Observe the licensee's critique and determine if the weaknesses observed by the inspection team were identified.

1. Evaluate all inspector-identified weaknesses not captured by the licensee. Ensure each issue actually represents a potential critique problem and not an inspector's misinterpretation of an exercise participants' performance, or a participants' performance of an activity not observed. Ensure a complete understanding of the logic underlying the licensee's disposition before identifying any issue as a critique problem. If the inspector identifies that a well-founded evaluator-identified weakness is improperly dispositioned and not adequately entered into the corrective action system, a critique problem exists, since the licensee is required to enter identified weakness into a corrective action system. Discuss such problems with cognizant licensee staff and/or management once the formal critique has been completed.
2. Document and assess licensee critique problems for potential violations. Failures of the licensee evaluation should be addressed during the NRC exit meeting.
3. Verify that licensee-identified exercise weaknesses are entered into the licensee corrective action system

#### 02.05 Identify Recurring Weaknesses.

- a. Identify if any of the weaknesses selected in Step 02.02 for evaluation had occurred in this exercise and determine if this recurrence is the result of ineffective corrective actions.
  1. Determine if the licensee identified the trend or repeat weakness and entered it into the corrective action system.
  2. Perform a detailed review of any failure to correct a drill or exercise weakness, including a detailed review of the weakness and the effectiveness of associated corrective actions, based on the complete history of the issue. The intent of this assessment is to see if there is a pattern of recurring performance problems in similar activities in order to identify ineffective corrective actions. A single repeat of a weakness should not automatically be deemed a failure of the corrective action system. Conversely, a single success in a drill or exercise (e.g., by one well-drilled team) should not necessarily be considered a demonstration of problem resolution. When a previously identified weakness recurs in a subsequent drill or exercise, the inspector should perform an assessment of the effectiveness of the prior corrective actions based on a complete history of the issue, the inspector should:
    - (a) Review specific corrective actions identified for the previous weaknesses, as well as similar occurrences in response to actual events, drills, exercises and training evolutions.

- (b) Review corrective action, self-assessment, and inspection records for an entire inspection cycle with emphasis on similar identified weaknesses.
- (c) Verify completion of associated corrective actions.

02.06 Identify Violations of Regulatory Requirements.

- a. Evaluate program element issues of concern related to the effectiveness and adequacy of the E-Plan, or its implementing procedures<sup>1</sup>, observed during an exercise as an apparent violation of 10 CFR 50.47(b) planning standards and Appendix E requirements. For example, the ERO field monitoring team was unable to perform the survey because of ineffective or inadequate survey procedures or equipment. Such issues, whether identified by the licensee or inspection team, are not treated as weaknesses. The inspector should:
  - 1. Review the history of identified issues 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.
  - 3. Evaluate the concern and the results of the additional review, assess the potential violation and document.

02.07 Evaluate the Exercise to Demonstrate Reasonable Assurance To Implement Adequate Protective Measures.

- a. Determine whether the exercise performance demonstrated that reasonable assurance exists that the licensee can effectively implement its Emergency Plan to adequately protect the public health and safety. Adequate licensee exercise performance demonstrates the following attributes and supporting program activities. Verify supporting activities for attributes identified during the licensee critique as being or having weaknesses:
  - 1. ERO Readiness - ERO duty roster, ERO Augmentation System, ERO Augmentation System Testing, ERO Training
  - 2. Equipment - Maintenance Surveillance and Testing of ERO Equipment and Communications Systems, Use in Drills and Exercises
  - 3. Procedure Quality - EAL Changes, Plan Changes, Use in Drills and Exercises
  - 4. ERO Performance - Program Elements Meet 50.47(b) Planning Standards, Actual Event Response, Training, Drills, Exercises

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<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.

- b. Evaluate, as necessary, whether a remedial exercise is required by Section IV.F.2.f of Appendix E to 10 CFR 50. That section provides the requirements for a remedial exercise, if the E-plan is not satisfactorily tested during the biennial exercise such that the NRC cannot find reasonable assurance that adequate protective measures can be taken in the event of a radiological emergency. Not invoking this regulation implies that the inspection team came to the conclusion that the E-plan was satisfactorily tested. If the exercise was not a satisfactory test of the E-plan or problems have been identified which potentially could result in a remedial exercise, the inspectors will obtain management review, and any subsequent action would not be decided by the inspection team alone. A remedial exercise may be requested if:

[10 CFR 50 Appendix E.IV.F.2.f]

1. Confidentiality is compromised to an extent that the exercise no longer affords the opportunity for the licensee to assess ERO performance of key skills and to identify necessary corrective actions. For example, the re-use of a scenario, a large portion of which was recently used (e.g., in a practice exercise for the graded exercise) the same scenario for the same ERO members. Since each situation needs to be considered on a case-by-case basis, the inspector should gather information that describes the scope of the breach and the number ERO members and their positions.
2. The scenario does not provide the opportunity for demonstration of key skills.
3. The scenario is not implemented in such a way that provides the opportunity for demonstration of key skills, or
4. ERO performance does not provide the NRC with a basis to determine that key skills have been maintained.

#### 02.08 Represent the NRC at the FEMA Public Meeting.

Represent the NRC at the FEMA public meeting. Make the appropriate statement as to the adequacy of exercise conduct from the NRC perspective.

"The preliminary observation of the inspection team is that conduct of the exercise was adequate to demonstrate the licensee's compliance with the EP performance attributes as well as reasonable assurance of the licensee's ability to effectively implement its emergency plan to adequately protect the public health and safety in the event of a radiological emergency." This is the preferred statement to be used at the FEMA public meeting.

"The NRC inspection team was not able to conclude its review of the exercise at this time. NRC will continue to review the available information before issuing an official inspection report." This statement should be used when the exercise conduct did not demonstrate support of the performance expectation.

Note: Potential licensee's program violations (i.e., against the exercise critique) as a result of the inspection should not be announced at the public meeting. NRC inspection reports are public information and will be released as soon as they are approved by management.

02.09 Review FEMA-Identified Exercise Deficiencies and Remedial Actions.

- a. Request NRC Headquarters to promptly inform the regional office of any potential deficiencies and remedial actions when notified by FEMA Headquarters per the "NRC/FEMA Memorandum of Understanding."
- b. Upon receipt of the letter providing official notification of offsite exercise deficiencies, review the proposed deficiencies and bases for understanding. FEMA review and findings are entitled to a presumption of adequacy and are to be taken at face value. If the basis for any deficiency is not clear or if the reviewer is aware of information to the contrary, obtain clarification from NRC Headquarters staff, Regional State Liaison Officers, or regional FEMA staff. Inform the licensee of offsite deficiencies via formal letter.

END

## ATTACHMENT 3

### EVALUATING EXERCISE PLAYER PROMPTING

#### 01.00 INTRODUCTION

This attachment provides guidance for inspectors in the identification of player prompting during drills and exercises conducted to meet the requirements of 10 CFR 50.47(b)(14) and Section IV.F.2 of Appendix E to 10 CFR Part 50.

Not all of the information that may be provided by controllers to players is coaching. Some information, namely “injects” are generally appropriate.

#### 02.00 INJECT

An inject is a verbal or written communication between a controller and a player that provides information regarding simulated conditions, analysis results, instrument readings, etc., all of which would reasonably be expected to be known or discoverable during an actual event. A inject may also be used to change the course of exercise play if that play threatens successful completion of the exercise.

A inject provides information that the player(s) would otherwise had readily available, but doesn't because of the artificiality of a drill or exercise situation. For example, it is acceptable for a controller to tell a field team member that his survey instrument is reading X.X, if the field team member performed the survey activity and then asked for the reading. It is similarly acceptable for a controller to hand an auxiliary operator passing through a plant area a card identifying that a simulated fire is burning in that area. However, a controller providing information that the player(s) have not earned will likely constitute prompting. The player “earns” the information by performing the procedures that would govern his or her actions during an actual emergency to the extent allowed by plant and personnel safety

The second part of the definition addresses a verbal or written communication intended to prevent or correct an unanticipated situation that would result in an inability to evaluate exercise objectives (e.g., a delayed general emergency declaration could prevent evaluation of offsite agency objectives). These situations could be due to an emergency response organization (ERO) performance deficiency or a deficiency in the exercise scenario either of which is an exercise weakness that needs to be critiqued and corrected. However, the exercise need not be terminated.

#### 03.00 PROMPTING

Prompting is an inject or other action by a controller or evaluator that prevents a true evaluation of a player's performance in an evaluated drill or exercise by masking performance weaknesses that would have otherwise become apparent if the prompting had not occurred.

Controller actions that could fall within the above definition include the following examples to the extent that the controller actions prevent a true evaluation of a player's performance or mask player or program weaknesses:

03.01 A controller who directs a player to perform an activity that the player would not have performed absent the prompt.

03.02 A controller who provides information that would not have yet been discoverable by any player.

03.03 A controller who by direct statements or facial expressions or other body language indicates to a player that the just-completed action is incorrect, such that the player re-performs the action and reaches a different endpoint than he would have absent the prompting.

03.04 A controller who provides a player with information that was not “earned” via simulation of an activity, if in doing so the player is alerted to his failure to perform the simulated activity. Specifically:

- a. It is prompting for a controller to provide a field team with sample readings when the field team did not simulate taking or analyzing that reading or sample.
- b. It is prompting for a controller to ask a field team what their dosimeter reads when the field team hasn't read their dosimeters since they left the plant.
- c. It is not prompting for a controller to provide information to a player if, during an actual event, the information would have been readily obvious, for example, a controller telling a player doing a plant tour that an explosion had just occurred in that plant area or an adjacent area. Note, however, that a controller telling the Emergency Director (ED) in the Technical Support Center (TSC) of an explosion in a high pressure safety injection quadrant is prompting because the ED had no reason to know the information, even in an actual event.

03.05 Controller statements to a player such as:

- a. “Are you sure that’s correct?”
- b. “Is that what the procedure calls for?”
- c. “That’s not correct. Try this approach.”
- d. “Did you see this change in the display?”
- e. “Are you aware the ED just declared an Alert?”
- f. “Have you made the notification yet?”

Prompting could prevent the identification and correction of ERO performance weaknesses as required by § IV.F.2.g of Appendix E to 10 CFR Part 50 and 10 CFR 50.47(b)(14). Accordingly, the failure of the licensee to identify the weaknesses, which would have been identified if not for the prompting, may be an issue that should be evaluated.

Note: Extensive prompting throughout an exercise may bring into question if the exercise was a satisfactory test of the E-Plan. Regional management will need to be involved in this determination.

04.00 CONSIDER A CASE:

04.01 A player properly classifies an emergency based on displayed indications (which, because of performance weaknesses in the control room, are in error).

04.02 Before the player could confirm the indicated value with the control room, as required by his procedure, and before declaration, the controller injects, stating that the displayed value is in error and provides the correct value.

04.03 The player now properly classifies the emergency based on the indication as revised by the controller (and as expected by the scenario.) The revised emergency classification level is declared and notifications made.

04.04 The player has performed two correct classifications, one based on erroneous data from the control room, and one based on the inject information. In such a case, the classification opportunity should be considered a success.

04.05 There is, however, a performance weakness in the control room handling of data and relaying data to the TSC that needs to be critiqued and corrective action taken.

END

## ATTACHMENT 4

### ERO WEAKNESSES

#### 01.00 INTRODUCTION

A weakness is defined as a level of Emergency Response Organization (ERO) performance demonstrated during an exercise, drill, or training (that provide performance opportunities to develop, maintain, or demonstrate key skills) that would preclude effective implementation of the E-plan if the weakness were to occur during an actual emergency. Further:

01.01 A weakness identified by the licensee in its critique is not a violation.

01.02 A deficient program element uncovered by the exercise and identified by the licensee in its critique is a licensee-identified violation and is evaluated as a failure to meet a regulatory requirement. If identified by the inspector, the deficient program element is an NRC-identified violation and is evaluated as a failure to meet a regulatory requirement.

01.03 A licensee's failure to identify a weakness in a critique or failure to take timely corrective actions, is a violation and is evaluated as a failure to meet a regulatory requirement, planning standard 10 CFR 50.47(b)(14).

#### 02.00 CLARIFICATION

02.01 A mistake or a miss-step by ERO members that only detracts from the overall ERO performance should generally not be treated as a weakness. Mistakes are likely to happen in the course of an exercise and many are corrected by the ERO (e.g., peer checking), which should be viewed as an organizational strength. Failure to identify these mistakes as weaknesses in the critique is generally not an issue of concern.

02.02 Classifications, protective action recommendations (PAR), and notifications could be accurate and timely and still have a weakness (e.g., a correct classification based on misinformation, a correct PAR based on an incorrect dose assessment). Such weaknesses need to be identified and corrected since, under different circumstances, they could affect functions necessary for protecting the health and safety of the public.

END

## ATTACHMENT 5

### PRIORITIZATION OF ADDITIONAL AREAS FOR INSPECTION

#### 01.00 GENERAL

Corrective action system data is used to identify response areas of concern and deploy inspection resources accordingly. Areas, (e.g., Operational Support Center (OSC), field monitor teams) that have had few critique issues or more than average as compared to the Technical Support Center (TSC) or Emergency Operations Facility (EOF) should be selected for observation. Inspection resources usually deployed in the TSC, EOF and Control Room may be used to observe other areas.

If a licensee's performance in previous inspections in classification, notification, dose assessment and protective action recommendation (PAR) indicates reliable acceptable performance, inspectors should reduce the inspection sampling in these areas and instead use a portion of available inspection resources to sample a selection of other areas as described below.

In order to facilitate review of critique related corrective actions, the inspector should request a corrective action system listing sorted for drill and exercise critique issues for the previous 2-3 years. If possible, the findings should be sorted by emergency response facility.

The inspector should remain alert to the impact that the licensee's performance in other areas (e.g., staffing and training) may have on the licensee's performance of classification, notification, dose assessment and PARs.

#### 02.00 PRIORITIZATION OF ADDITIONAL AREAS FOR INSPECTION

Guidance for deployment of inspection resources beyond classification, notification, dose assessment and PARs areas is provided below. These areas may generally be considered in order of importance. Selection for deployment of inspection resources should be based on knowledge of the program, previous problems, and logistics.

02.01 Adequacy of worker protection including accountability, evacuation, exposure authorization and thyroid protection, including actions during a hostile action [10 CFR 50.47(b)(10) & (11) and Sections IV.E and IV.I of Appendix E to 10 CFR Part 50].

02.02 Adequacy of interface with offsite authorities (e.g., in the area of PAR communication and technical support). [10 CFR 50.47(b)(6) and Sections IV.A.7, IV.E.9, and IV.D of Appendix E to 10 CFR Part 50].

02.03 Adequacy of arrangements for offsite resources responding to an emergency, including hostile actions, at the licensee's site [10 CFR 50.47(b)(6) and Section IV.A.7 of Appendix E to 10 CFR Part 50.]

- 02.04 Ability to formulate mitigating actions.
- 02.05 Ability to prioritize mitigation and assessment efforts to protect the public health and safety.
- 02.06 Ability to implement mitigating actions (e.g., damage control teams) under accident conditions.
- 02.07 Effectiveness of command and control [10 CFR 50.47(b)(1)].
- 02.08 Ability to diagnose plant accident conditions, other than offsite consequences addressed in the risk-significant area discussion.
- 02.09 Adequacy of communications between licensee facilities [10 CFR 50.47(b)(6) and Section IV.E.9 of Appendix E to 10 CFR Part 50].
- 02.010 Accuracy and completeness of licensee-approved press releases [10 CFR 50.47(b)(7)]

END

ATTACHMENT 6 - Revision History for IP 82401

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number
N/A	ML14078A529 09/04/14 CN 14-020	First issuance. Researched commitments for the last four years and found none.	None	ML14078A516