SECTION 15

EXERCISES AND DRILLS

1.0 Exercises

An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency plans of the principal response organizations.

1.1 Exercise Schedule

Exercises required by NUREG-0654 are shown in Table 15-1.

The scenario is varied from year to year such that all major elements of the plans and preparedness organizations are tested within an eight-year period. An exercise should start between 6:00 p.m. and 4:00 a.m., once every eight years. Exercises are conducted under various weather conditions.

1.2 <u>Exercise Scenario</u>

Exercises are conducted in accordance with an exercise manual approved by the EP Manager, or designee, that includes, at a minimum, the following elements:

- 1) Exercise objectives
- 2) Date(s), time period, and place(s) for exercise and drill events and the briefings and critiques.
- 3) Participating agencies and locations
- 4) Guidelines for the conduct of the exercise
- 5) Assignments for Referees/Observers and arrangement for official observers for the federally observed biennial exercise.
- 6) Evaluation criteria
- 7) Narrative scenario summary and timeline
- 8) Initiating events
- 9) Test messages
- 10) Operational and radiological data
- 11) Field radiation monitoring data
- 12) Simulated events/actions

Official referees/observers are issued controlled copies of appropriate portions of an exercise manual in advance of an exercise. PSEG limits the scope and timing of this distribution to protect the confidentiality of the exercise scenario.

1.3 Exercise Evaluation

Federal observers/evaluators or drill referees/observers will evaluate based on the adequacy of the emergency response demonstrated for the exercise objectives. Following an exercise, a critique is scheduled to evaluate the ability of the participants to respond to an emergency in accordance with the plan and procedures and to identify any deficiencies in training, facilities, equipment, or procedures.

The biennial exercise critique consists of a review and analysis of comments from observers and participants with federal observers in attendance, to evaluate the performance and identify areas needing improvement.

The EP Manager reviews all deficiencies identified and ensures corrective actions are assigned appropriately. The NRC evaluated exercise critiques are rolled out to senior management through NRC exit meetings, station morning meetings, and emailing out the final critique report. Corrective actions are tracked for timely resolution or escalated to higher levels of management for action.

An exercise shall test, as a minimum, the following response capabilities:

- 1) Ability of personnel to assess simulated plant conditions and take the appropriate actions.
- 2) Notification, communication, and coordination with the response organizations of the States of New Jersey and Delaware.
- 3) Transfer of emergency coordinator authority and responsibility.
- 4) Staffing of emergency facilities.
- 5) Ability to provide radiological assessment.
- 6) Ability to provide technical evaluation of plant conditions.
- 7) Ability to conduct and coordinate radiological surveys.
- 8) Ability to provide appropriate protective action recommendations.
- 9) Ability to provide appropriate emergency response and initiate recovery management (if scenario allows) from the Emergency Operations Facility (EOF).

2.0 Drills

A drill is a supervised instruction period aimed at developing and maintaining skills in a particular operation. Drills are a training tool to develop and maintain the emergency response organization.

2.1 Drill Schedule

Drills required by NUREG-0654 and 10 CFR 50 Appendix E are shown in Table 15-1 and training may be conducted as a component of an exercise or an evaluation drill in the Emergency Preparedness Training Program shown in Table 16-2.

2.2 <u>Communications Drills</u>

2.2.1 Monthly Communications Drill

The monthly communications drill consists of a test of the primary and/or secondary communications links between the Control Rooms, TSCs and EOF and the appropriate initial state and local government contact points.

A communications drill to NRC Headquarters and the NRC Regional Office Operations Center from the Control Rooms, TSCs and EOF is completed monthly.

2.2.2 Quarterly Communications Drill

The quarterly communications drill consists of a test of the primary and/or secondary communications links between the Control Rooms, TSCs, and EOF and the appropriate federal emergency response organizations and states within the ingestion pathway contact points.

2.2.3 Annual Communications Drill

The annual communications drill consists of a test of the communications equipment used for notifications with Federal emergency response organizations.

2.2.4 Annual Field Assessment Drill

The annual field assessment team communications drill consists of a test of the primary and secondary communications equipment used for communication among the nuclear facility, the state and local emergency operation centers, and the field assessment teams.

3.0 Notifications

3.1 Pager test

The quarterly Pager test consists of a test of the primary and/or secondary communications links between the callout computer and PSEG emergency response organization members that carry pagers.

4.0 Fire Drills

4.1 Fire Drill

Fire drills are performed at predetermined intervals, not to exceed three months, in accordance with the Fire Protection Program.

5.0 <u>Medical Emergency Drills</u>

5.1 Annual Medical Emergency Drill

The annual medical emergency drill consists of appropriate treatment of the simulated contaminated person(s), use of appropriate contamination control measures, and the transportation to the local medical facility by the station ambulance. (The offsite portions of the medical drill may be performed as part of the required annual exercise.)

6.0 Radiological Monitoring Drills

6.1 Annual Radiological Monitoring Drill

The annual radiological monitoring drill consists of onsite and offsite surveys (to include environmental samples) and assessment of simulated survey results by the appropriate members of the emergency response organization.

7.0 Radiation Protection Drills

7.1 Semi-Annual Radiation Drill:

The semi-annual radiation drill demonstrates Radiation Protection personnel response to simulated elevated radiation levels in airborne and liquid samples and simulates direct reading of radiation measurements in the environment.

8.0 Other Drills

8.1 Accountability Drill

The annual accountability drill demonstrates the ability of personnel to report to their accountability stations and the accounting of protected area personnel during a simulated emergency. Additionally, security force personnel ensure that the accessible areas of the exclusion zone are simulated to be cleared of contractor personnel, and/or members of the general public.

There are two (2) types of accountability drills that may be performed; full accountability drills or limited accountability drills. A full accountability drill involves participation of all protected area personnel and shall be conducted at least once every eight (8) years. The decision to use a full accountability or a limited accountability drill in any given year will depend on station conditions. During the years that a limited accountability drill is conducted (in lieu of a full accountability drill), station personnel will be provided information that describes the actions required during assembly/accountability. A limited accountability drill involves predesignated drill participants.

8.2 <u>Team-training Drill</u>

Supervised instruction in which personnel in various emergency response positions work together to accomplish a similar task and demonstrate the ability to perform their assigned functions as a unit.

8.3 <u>Facility Drill</u>

Supervised instruction in which all personnel who are required to perform their emergency response tasks at a facility (e.g., Operations Support Center, Technical Support Center, Emergency Operations Facility, Emergency News Center) demonstrate the ability to perform and integrate their assigned functions within the facility. A facility drill may be a part of a facility tabletop training session.

8.4 Site Drill

Supervised instruction in which the emergency response organization and emergency facilities are activated to demonstrate the ability to integrate the emergency response for the common goal of protecting the health and safety of the public in the event of an emergency at the PSEG Site.

8.5 Tabletop Training Session

A 90 to 120 minute training activity conducted in specified emergency facilities. This training session provides the ERO facility members an opportunity to review response expectations, discuss lessons learned from other drills or industry events, obtain training on targeted areas, complete qualification cards and to develop a team approach to emergency response.

8.6 <u>Drill Scenario</u>

Drills are performed in accordance with a drill manual, which includes the basic elements required for the type of drill conducted.

8.7 Drill Evaluation

Drills are evaluated to determine the adequacy of the emergency response demonstrated to meet drill objectives and to identify areas needing improvement. The evaluation consists of a critique of the major elements of the drill, by drill coaches and the participants.

Drills are considered part of emergency response training. Corrective actions for deficiencies identified during drills or exercises are taken in accordance with the PSEG Corrective Action Program or as defined in Section 16 of the Emergency Plan.

8.8 Augmentation Drills

Augmentation drills serve to demonstrate the capability of the process to augment the on-shift staff with a TSC, OSC, EOF, and ENC/JIC after declaration of an emergency. An unannounced augmentation drill shall be performed at least once every cycle (8 years).

TABLE 15-1 SCHEDULE OF EXERCISES AND DRILLS

Frequency

Exercise

EXERCISE	<u>Frequency</u>
State of New Jersey/PSEG	Biennially ^{1, 2}
State of Delaware/PSEG	Biennially ^{1, 2}
<u>Drill</u>	<u>Frequency</u>
Communication - State of New Jersey	Monthly
Communication - Salem and Cumberland Counties, New Jersey	Monthly
Communication - State of Delaware	Monthly
Communication - New Castle and Kent Counties, Delaware	Monthly
Communication - Federal (NRC)	Monthly
Communication - Federal (DOE & USCG)	Quarterly
Communication - NOAA Weather	Quarterly
Communication - Ingestion Pathway States (Pennsylvania, Maryla	nd) Quarterly
Communication - Federal Emergency Response Organizations	Annually
Communication - PSEG Facilities And Field Assessment Teams	Annually
Notification - Pager test	Quarterly
Fire Drill	Not To Exceed Three Months
Medical Emergency (Simulated Contaminated Personnel)	Annually
Radiological Monitoring	Annually
Radiation Protection (Health Physics Drill)	Semi-Annually
Accountability (Full and/or Limited) (A full accountability drill shall be conducted at least once every six	Annually (6) years)
Augmentation	Once Every Eight Years
EOF Consolidated Functions Drill (multiple units in emergency)	Once Every Eight Years
Hostile Action Based Drill	Once Every Eight Years

¹ May be conducted as separate or coordinated exercise.

² Will consist of events classified as General Emergency.