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10 CFR 50.4(b)(5)(iii)
10 CFR 50.54(q)(5)
10 CFR 50, Appendix E, Section V

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U.S. Nuclear Regulatory Commission
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CATAWBA NUCLEAR STATION, UNITS 1 AND 2
DOCKET NOS. 50-413, 50-414 / LICENSE NOS. NPF-35 AND NPF-52

MCGUIRE NUCLEAR STATION, UNITS 1 AND 2
DOCKET NOS. 50-369, 50-370 / LICENSE NOS. NPF-9 AND NPF-17

OCONEE NUCLEAR STATION, UNITS 1, 2 AND 3
DOCKET NOS. 50-269, 50-270, 50-287 / LICENSE NOS. DPR-38, DPR-47 AND DPR-55

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
DOCKET NOS. 50-325, 50-324 / LICENSE NOS. DPR-71 AND DPR-62

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1
DOCKET NO. 50-400 / LICENSE NO. NPF-63

H.B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2
DOCKET NO. 50-261 / LICENSE NO. DPR-23

**Subject: TRANSMITTAL OF EMERGENCY PLAN IMPLEMENTING PROCEDURE:
AD-EP-ALL-0802, REVISION 2**

Ladies and Gentlemen:

In accordance with 10 CFR 50.4(b)(5)(iii), 10 CFR 50.54(q)(5) and 10 CFR 50, Appendix E, Section V, Duke Energy is submitting fleet Emergency Preparedness procedure AD-EP-ALL-0802, *Conducting Drills and Exercises*, Revision 2 as an Emergency Plan Implementing Procedure for Shearon Harris Nuclear Power Plant, Unit 1. Duke Energy is submitting the fleet procedure for Catawba Nuclear Station, McGuire Nuclear Station, Oconee Nuclear Station, Brunswick Steam Electric Plant and H.B. Robinson Steam Electric Plant, Unit 2 as information only. The procedure is not Emergency Plan Implementing Procedure for those sites. The effective date of procedure AD-EP-ALL-0802, Revision 2 was January 14, 2016.

Duke Energy has evaluated this procedure revision, in accordance with 10 CFR 50.54(q), and determined that the revision does not constitute a reduction in the effectiveness of the

Emergency Plan for any Duke Energy nuclear station and that the Emergency Plans continue to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. Enclosure 1 provides a 10 CFR 50.54(q)(5) summary for procedure AD-EP-ALL-0802, Revision 2. Enclosure 2 contains a copy of procedure AD-EP-ALL-0802, Revision 2.

This document contains no regulatory commitments. Please refer any questions regarding this submittal to Mr. Art Zaremba at 980-373-2062.

Sincerely,



M. Christopher Nolan, Director
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Enclosures:

1. 10 CFR 50.54(q)(5) Summary
2. Copy of Fleet Emergency Preparedness Procedure

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10 CFR 50.54(q)(5) Summary

In accordance with 10 CFR 50.54(q)(5), Duke Energy is providing a summary of the fleet Emergency Plan Implementing Procedure revision AD-EP-ALL-0802, *Conducting Drills and Exercises*, Revision 2.

This revision addresses gaps identified in a comparison of Duke Energy Nuclear Operating Fleet Administrative Procedures with INPO 14-003, Emergency Drills and Exercise Guideline.

Definitions

1. Section 3.0, Step 2, Bullet 1: Deleted the following from the definition of Coach due to potential drill participant preconditioning concerns: "Controllers and evaluators may coach when Drill and Exercise Performance (DEP) opportunities and other objectives are not being evaluated."
2. Section 3.0, Step 2, Bullet 5: Revised from, "Provides key information and data to participants (players)" to "Provides key information and data to participants (players) as directed by the scenario and in response to participant's actions," to add clarifying information regarding the allowable scope of Controller communications.
3. Definition 3.3 Controller - Deleted existing 6th bullet which read, "Prompts or initiates certain player actions," due to potential drill participant preconditioning concerns.

Responsibilities

4. Sections 4.1 Lead Scenario Controller, 4.2 Lead Facility and Function Controller, 4.3 Controller, 4.4 Lead Facility and Function Evaluator and 4.5 Evaluator - Added the following responsibility: "Verifies Controller/Evaluator qualifications and/or training requirements are current in accordance with site specific requirements prior to performing as a controller or evaluator."

Instructions

5. 5.1 Scenario Event Preparation and Conduct, Section 5.1.1 Controller Evaluator Packages, Step 4 - Clarified that Controllers and Evaluators should be trained in accordance with site-specific training requirements and removed allowance for a pre-job brief in lieu of meeting the site-specific training requirements by revising the step from: "Conduct Controller and Evaluator training in accordance with each site specific training requirements. If there is no governing training requirement, then consider a pre-job brief." to "Ensure Controllers and Evaluators are trained in accordance with each site specific training requirements."
6. 5.1 Scenario Event Preparation and Conduct, Section 5.1.2 Controller and Evaluator Briefing, added the following new Step 4 outlining the scope of allowable prompting and requiring that any prompting be documented in the Corrective Action Program: "Prompting may be appropriate after participants have made errors in order to avoid negative training. Any prompting shall be documented in the Corrective Action Program and discussed during the critique." Subsequent items were renumbered.

7. 5.1 Scenario Event Preparation and Conduct, Section 5.1.2 Controller and Evaluator Briefing, old Step 9 - Deleted step as it was redundant with new Step 4.
8. 5.1 Scenario Event Preparation and Conduct, Section 5.1.3, ERO Participant Briefing - Added the following new Note 2 before Step 1 clarifying that certain topics/discussion points should be avoided during the Participant Brief to preclude preconditioning of drill participants: "The following discussion points/items may result in pre-conditioning drill participants and should be avoided during the Participant Briefing:
 - Operating Experience (OE) that is directly related to elements of the drill
 - Recent Emergency Preparedness Program changes
 - Reminders on how to perform tasks or functions"
9. 5.1 Scenario Event Preparation and Conduct, Section 5.1.3, ERO Participant Briefing - Deleted the following items due to potential drill participant preconditioning concerns:
 - A summary of recent or critical facility Performance Indicator misses and failed performance objectives or demonstration criteria in prior scenarios
 - Expectations for log-keeping
 - Reinforce the importance of accurate communication, both verbal and written
10. 5.1 Scenario Event Preparation and Conduct, Section 5.1.4, Operator Participant Briefing, item 1 - Revised from "Conduct an Operator Participant Briefing with the following personnel:" to "Ensure an Operator Participant Briefing is performed with the following personnel:"
11. 5.1 Scenario Event Preparation and Conduct, Section 5.1.4, Operator Participant Briefing, item 2 - Clarified that participating Operators should be trained in accordance with Operations Training requirements by revising from, "Conduct the Operator Participant briefing on the day of the scenario prior to walking down the Simulator or Main Control Boards and shift turnover, including the following items:
 - Any postulated plant system and equipment status and degree of in-plant and offsite simulation
 - Expectations for log-keeping (Operations Crew to maintain logs, electronic or paper, as appropriate to the simulator capability)
 - Maintaining a six inch rule " to "Ensure the Operator Participant briefing is performed per operations training requirements on the day of the scenario prior to walking down the Simulator or Main Control Boards and shift turnover."

Implementation of AD-EP-ALL-0802, Revision 2 does not result in a reduction in effectiveness of facilities, response organizations or response equipment. Implementation of AD-EP-ALL-0802, Revision 2 does not reduce the effectiveness of the Emergency Plans as written and approved for Catawba, McGuire, Oconee, Robinson, Harris and Brunswick. The procedure revision continues to support planning standards, as described in 10 CFR 50.47(b) and NRC requirements, as described in 10 CFR 50, Appendix E.

Copy of Fleet Emergency Preparedness Procedure



NUCLEAR OPERATING FLEET
ADMINISTRATIVE PROCEDURE

AD-EP-ALL-0802

CONDUCTING DRILLS AND EXERCISES

REVISION 2

Effective Dates:

01/14/2016
Brunswick

01/14/2016
Catawba

01/14/2016
Harris (HNP)

01/14/2016
McGuire

01/14/2016
Oconee

01/14/2016
Robinson

01/14/2016
NGO

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REVISION SUMMARY
PRR 1990054
DESCRIPTION
<p>This revision address gaps identified in a comparison of Duke Energy Nuclear Operating Fleet Administrative Procedures with INPO 14-003, Emergency Drills and Exercise Guideline, that were characterized as unsatisfactory gaps and additional comments.</p> <ul style="list-style-type: none"> • Section 3.0, Step 2, bullet 1: Deleted last sentence due to potential drill participant preconditioning concerns. • Section 3.0, Step 3, bullet 5: Added clarifying information regarding the allowable scope of Controller communications. • Section 3.0, Step 3, bullet 6 (old): Deleted due to potential drill participant preconditioning concerns. • Sections 4.1, 4.2, 4.3, 4.4 and 4.5: Added responsibility to each section for verification of qualifications prior to performing duties as a Controller or Evaluator. • Section 5.1.1, Step 4: Clarified that Controllers and Evaluators should be trained in accordance with site-specific training requirements and removed allowance for a pre-job brief in lieu of meeting the site-specific training requirements. • Section 5.1.2, Step 4 (new): Added new step outlining the scope of allowable prompting and requiring that any prompting be documented in the Corrective Action Program. This step also replaces Step 5.1.2.9 (old). • Section 5.1.3, Step 1 NOTE 2 (new): Added new note clarifying that certain topics/discussion point should be avoided during the Participant Brief to preclude preconditioning of drill participants. • Section 5.1.3, Step 1, bullets 5 (old), 6 (old) and 8 (old): Deleted due to potential drill participant preconditioning concerns. • Section 5.1.4, Step 1: Minor update to step wording. • Section 5.1.4, Step 2: Clarified that participating Operators should be trained in accordance with Operations Training requirements and removed specific briefing topic examples. <p>Additional Changes:</p> <ul style="list-style-type: none"> • Section 7.2: Moved DEP E-Plan procedures from Section 7.3 to 7.2 and added Fusion hyperlinks. • Section 7.3, Steps 8 (old), 10 (old): Updated superseded references to current reference FEMA-REP-1028 under step 7.3.9 (new). (PRR 1964986) • Section 7.3, Step 15: Updated superseded reference to current reference INPO 12-013. (PRR 1964986)

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1.0 PURPOSE

1. This procedure provides instructions for conducting Duke Energy Emergency Preparedness drills and exercises.

2.0 SCOPE

1. This procedure is applicable to all individuals and organizations supporting Emergency Preparedness Drills and Exercises for the Duke Energy nuclear operating fleet.
2. This procedure is applicable to drills and exercises conducted to enhance emergency response skills and evaluate performance and capabilities.
3. This procedure applies to the Design Basis Duke Energy Emergency Preparedness Drill and Exercise Program and may be used as a guideline, using a graded approach, for Beyond Design Basis External Events (BDBEE) drills and exercises at management discretion.
4. [HNP] Work in progress for a drill planned prior to implementation of this procedure may be completed using site procedure EPM-210, EP Drill and Exercise Program. EPM-210 will be superseded following this previously planned drill.

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3.0 DEFINITIONS

1. **Candidate or Trainee:** An individual participating in a drill or exercise for the purpose of completing the drill and exercise portion of the ERO qualification checklist.
2. **Control Modes:** The level of interface between the Controller and the Participants in a drill or exercise. These include any of the following:
 - **Coach:** Used when the fundamental aspects of the task or objective are to be successfully accomplished by the drill or exercise participants or candidate. Enhancements, or alternative methods for accomplishment of the detailed elements of the task or objective, are presented to enhance the training benefit of the drill or exercise activity.
 - **Monitor:** Used when activities are performed by the drill or exercise participants with no assistance from the controllers and evaluators. All controller related activities are observations and passive in nature unless specific drill or exercise driven information is required to be presented. Controllers and evaluators use this mode while DEP opportunities and other objectives are being evaluated.
 - **Prompt:** Used when participants require assistance with the fundamental aspects of the task or objective. Lack of action on the part of the Controller staff would prevent correct accomplishment of the task, or otherwise prevent other essential aspects of the scenario from being accomplished. Prompting is often initiated through use of a prepared contingency message card. A prompt may mask performance weaknesses that would have otherwise become apparent if the prompting had not occurred.
3. **Controller:** An individual in an operations-based drill or exercise, who performs any of the following:
 - Plans and manages drill or exercise play
 - Sets up and operates a drill or exercise incident site
 - Simulates the roles of individuals and agencies not actually participating in the drill or exercise (e.g., in the Simulation Cell [SimCell])
 - Directs the pace of drill or exercise play
 - Provides key information and data to participants (players) as directed by the scenario and in response to participant's actions.
 - Provides injects to the players as described in the Master Scenario Event List (MSEL) to ensure drill or exercise continuity

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3.0 DEFINITIONS (continued)

4. **Controller and Evaluator Briefing (C-E Briefing):** A pre-drill or exercise overview for controllers, evaluators, and drill or exercise administrative staff summarizing the C-E Handbook or the COSIN and EvalPlan. The briefing focuses on explaining the roles and responsibilities of controllers and evaluators.
5. **Control Staff Instructions (COSIN):** A method typically used in larger, more complex drills or exercises, containing guidance controllers may need concerning procedures and responsibilities for drill or exercise control, simulation, and support. COSIN is designed to help drill or exercise controllers understand their roles and responsibilities in drill or exercise execution in order to conduct an effective drill or exercise. For most drills or exercises COSIN can be combined with an Evaluation Plan (EvalPlan) to produce a Controller and Evaluator (C-E) Handbook.
6. **Exercise Plan (ExPlan):** General information documents that help operations-based drills or exercises run smoothly. The ExPlan is published and distributed prior to the start of drills or exercises and provide a synopsis of the drill or exercise. In addition to addressing drill or exercise objectives and scope, the ExPlan assigns activities and responsibilities for successful exercise execution. The ExPlan enables participants to understand their roles and responsibilities in drill exercise planning, execution, and evaluation. The ExPlan is intended for use by drill or exercise players and observers, therefore, it does not contain detailed scenario information that may reduce the realism of the tasks to be performed.
7. **Inject:** Defined in AD-EP-ALL-0801, Design and Development of Drills and Exercises
8. **Observer:** An individual authorized by the site Emergency Preparedness Manager or designee to monitor a drill or exercise. The individual is not authorized to interact with participants or influence the evaluation of their performance. Observers do not directly participate in the drill or exercise; rather, they observe selected segments of the drill or exercise as it unfolds, while remaining separated from player activities. Observers view the drill or exercise from a designated observation area and are asked to remain within the observation area during the drill or exercise.

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3.0 DEFINITIONS (continued)

9. **Observer Briefing:** A pre-drill or exercise overview given by one or more members of the drill exercise planning team to educate observers about program background, scenario, schedule of events, observer limitations, and any other miscellaneous information. (Many times, observers are unfamiliar with public safety procedures and have questions about the activities they see.)
 - Designating someone to answer questions, such as a response agency Public Information Officer (PIO), will prevent observers from asking questions of players, controllers, or evaluators.
10. **Participant:** An overarching group that includes all players, controllers, evaluators, and staff involved in conducting a drill or exercise.
11. **Player:** Individuals with an active role in preventing, responding to, or recovering from the risks and hazards presented in the drill or exercise scenario, by either discussing (in a discussion-based exercise) or performing (in an operations-based exercise) their regular roles and responsibilities. Players initiate actions that will respond to or mitigate a simulated emergency.
12. **Player Briefing:** A briefing, held prior to an operations-based drill or exercise, to address individual roles and responsibilities, drill or exercise parameters, safety, badges, and any other logistical items.
13. **Presentation:** A meeting that typically starts with brief remarks from representatives of the drill exercise planning team or sponsoring entity, or senior officials from the governing jurisdiction. After the opening remarks, the presentation moves into a brief introductory and explanatory phase led by a moderator. During this phase, attendees are introduced to facilitators and evaluators, given background on the drill or exercise process, and advised about their individual roles and responsibilities.
14. **Simulators:** Control staff personnel who role-play as non-participating organizations or individuals. Simulators most often operate out of the SimCell, but may occasionally have face-to-face contact with players. They function semi-independently under the supervision of SimCell controllers, enacting roles (e.g., as media, reporters, or next-of-kin) in accordance with instructions provided in the MSEL.

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4.0 RESPONSIBILITIES

4.1 Lead Scenario Controller

1. Oversees all drill or exercise functions, including the following:
 - Contingency Injects
 - Deviations from timeline
 - Scenario data problems
 - Milestones
2. Oversees and remains in contact with controllers and evaluators.
3. Ensures that all drill or exercise objectives have been demonstrated prior to terminating the scenario.
4. Collects all documentation and critiques from the drill or exercise.
5. Debriefs controllers and evaluators following the drill or exercise.
6. Oversees setup and cleanup of the drill or exercise as well as positioning of controllers and evaluators.
7. Verifies Controller/Evaluator qualifications or training requirements are current in accordance with site-specific requirements prior to performing as a Controller or Evaluator.

4.2 Lead Facility and Function Controller

1. Notifies the Lead Scenario Controller of problems with scenario data, events that do not follow the timeline, and completion of major events in the scenario timeline.
2. Ensures distribution of applicable scenario information to the participants in accordance with the scenario manual and instructions from the Lead Scenario Controller.
3. Obtains concurrence of the Lead Scenario Controller prior to permitting any significant deviation from the anticipated response that affects the timeline.
4. Notifies Lead Controllers in other facilities of drill participant intended actions that may affect scenario execution.
5. Performs the role of Lead Facility and Function Evaluators.
6. Maintains overall organization of the drill or exercise.

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4.2 Lead Facility and Function Controller (continued)

7. Monitors drill or exercise progress and coordinates decisions regarding deviations or significant changes to the scenario caused by unexpected developments during play.
8. Monitors actions by individual controllers and ensures they implement all designated and modified actions at the appropriate time.
9. Debriefs controllers and evaluators after the drill or exercise.
10. Oversees the setup and takedown of the drill or exercise.
11. Verifies Controller/Evaluator qualifications or training requirements are current in accordance with site-specific requirements prior to performing as a Controller or Evaluator.

4.3 Controller

1. Controls the progress of the exercise to maintain the scenario timeline.
2. Notifies the Lead Facility Controller of problems with scenario data, events that are not following the scripted timeline, and completion of major events in the scenario.
3. Notifies the Simulator Operator of events in the field before the participants communicate with the Operating Crew to ensure simulator fidelity and scenario parameters are maintained.
4. Issues drill or exercise materials to players.
5. Monitors the drill or exercise timeline and safety of all drill or exercise participants.
6. Provides information or direction to players as allowed under the Control Modes described in Section 3.0 Step 2.
7. Based on drill or exercise needs, may serve as an additional evaluator (this is an exception).
8. Maintains qualification in the position they are controlling or have the same technical and program expertise as the qualified individual.
9. Attends the pre-job brief for controllers and evaluators to receive drill book and obtain information for the drill or exercise. This may also satisfy controller and evaluator training requirements.
10. Participates as a member of the drill or exercise planning team, as requested.

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4.3 Controller (continued)

11. Verifies Controller/Evaluator qualifications or training requirements are current in accordance with site-specific requirements prior to performing as a Controller or Evaluator.

4.4 Lead Facility and Function Evaluator

1. Notifies the Lead Scenario Controller of the status of objectives demonstrated prior to terminating the scenario.
2. Coordinates the facility or area critique and compiles the observations and evaluations for the facility or area.
3. Provides the facility or area critique report and participant documents to the Lead Scenario Controller.
4. Evaluates ERO performance in the facilities and adequacy of the EP program (e.g., Plan, procedures, equipment) against designated objective and demonstration criteria.
5. Fully participates as a member of the exercise planning team and is familiar with prevention, protection, response, and recovery issues associated with the following:
 - Drills or exercises
 - Plans
 - Policies
 - Procedures of the exercising entity
 - Incident Command and decision-making processes of the exercising entity
 - Interagency or inter jurisdictional coordination issues relevant to the drill or exercise
6. Possesses management skills to oversee a team of evaluators over an extended process, as well as the knowledge and analytical skills to undertake a thorough and accurate analysis of all capabilities being tested during a drill or exercise.
7. Verifies Controller/Evaluator qualifications or training requirements are current in accordance with site-specific requirements prior to performing as a Controller or Evaluator.

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4.5 Evaluator

1. Maintains a chronological record of significant events, player responses and their own comments and questions on an observation form in sufficient detail to provide an accurate record of activities.
2. Provides input to the Lead Facility Evaluator for the evaluation of the demonstration criteria for the applicable scenario objectives.
3. Evaluates participant (players) performance against designated objectives and demonstration criteria, as well as the adequacy of the site emergency plan, procedures, facilities, and equipment.
4. Uses AD-EP-ALL-0803, Evaluation and Critique of Drills and Exercises, to measure and assess performance, capture unresolved issues, and analyze drill or exercise results.
5. Assesses and documents players performance against established emergency plans and drill or exercise evaluation criteria, in accordance with site and 8. Homeland Security Exercise and Evaluation Program (HSEEP) standards.
6. Records the actions and decisions of players without interfering with drill or exercise flow.
7. Maintains qualifications in the positions they are evaluating or have the technical and program expertise as that qualified individual.
8. Attends pre-drill or exercise briefings to obtain or maintain any required training.
9. Verifies Controller/Evaluator qualifications or training requirements are current in accordance with site specific requirements prior to performing as a Controller or Evaluator.

4.6 Candidate

1. Demonstrates performance in a single position (simultaneous position holding is prohibited).
2. Receives coaching by qualified position holders participating in the drill.
3. Receives drill credit upon completion of the Initial Qualification Checklist drill standard.
4. Demonstrates fundamental elements of the position without prompting and may use demonstration through discussion if the drill scenario does not provide an the opportunity to demonstrate.
5. Maintains all other training requirements per Initial Qualification Checklist.

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4.7 Evaluation Team

1. Observes and records player actions.
2. Maintains familiarity with the evaluated entity's plans, policies, procedures, and agreements.

4.8 Facilitator

1. Participates in discussion-based drills or exercises.
2. Keeps participant discussions aligned with the drill or exercise design objectives.
3. Ensures all issues and objectives are explored as thoroughly as possible within time constraints.

4.9 Safety Controller

1. Monitors drill or exercise safety during drill or exercise setup, conduct, and cleanup.
2. Reviews safety concerns reported by a drill or exercise organization member.

5.0 INSTRUCTIONS

5.1 Scenario Event Preparation and Conduct

5.1.1 Controller and Evaluator Packages

1. Prepare and distribute packages to the Controllers and Evaluators during or before the Controller and Evaluator Briefing.
2. Include the following in the Controller and Evaluator packages:
 - Master Scenario Event List (MSEL)
 - Initial conditions
 - Summary of expected EALs and PARs
 - Controller messages
 - Exercise ground rules
 - Participant and controller phone lists
 - Attachment 3, Scenario Day Facilities Activities List (Example)
 - Evaluation packages including the following:
 - ◇ DEPs
 - ◇ Objectives
 - ◇ Demonstration criteria
 - ◇ Log forms
 - Attendance sheets
 - Participant comment sheets
 - Facility specific items (e.g., Operations turnover packages)
3. Consider holding the Operations Support Center (OSC) Controller and Evaluator meeting far enough in advance so that any problems identified with in-plant message logistics can be addressed prior to running the scenario.
4. Ensure Controllers and Evaluators are trained in accordance with site-specific training requirements.

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5.1.2 Controller and Evaluator Briefing

1. Conduct a Controller or Evaluator briefing using the outline in Attachment 1, Controller - Evaluator Briefing Outline (Example), including any of the following items:
 - a. An ERO team shall be designated as the on deck ERO team to support conduct of drills and exercises as the Controllers and Evaluators.
 - (1) Conduct the briefing approximately one week prior or up to the day before an operations-based drill or exercise (generally one to two hours in length).
 - (2) Using the site or fleet drill and exercise schedule, identify and designate an entire ERO team as the on deck ERO team to be utilized as Controllers or Evaluators.
 - (3) At a minimum, the on deck team shall consist of the key functional team members required to observe a drill as an evaluator for their qualified position.
 - (4) If swapping Controller and Evaluator duties, then the affected individuals must make the required scheduling arrangements and obtain facility lead approval.
 - b. Perform an introduction of all members.
 - c. Identify Controller and Evaluator assignments in accordance with Attachment 2, Controller and Evaluator Assignments (Example).
 - (1) Based on the complexity of the drill or exercise, assign the necessary position-specific controllers or evaluators from the designated on deck ERO team.
 - (2) Use a controller for the fire brigade during Hostile-Action Based scenarios.
 - d. Distribute scenario manual and controller packages.
 - e. Perform scenario overview including postulated DEP and objective opportunities.
 - f. Provide plant information including special plant conditions, badges, and Radiation Work Permits (RWP).
 - g. Designate intra-facility controller communication methods, including telephone numbers.

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5.1.2 Controller and Evaluator Briefing (continued)

- h. Maintain a six inch rule.
 - (1) Individuals performing simulated activities involving plant equipment shall maintain a six inch standoff from all plant equipment including equipment labels.
 - i. Specify the protocol for suspension and termination of the scenario.
 - j. Review scenario confidentiality.
2. Assign responsibility for issuing each scenario message to one or more specific Controllers or Evaluators.
 3. Ensure participants have demonstrated sufficient ability to obtain relevant scenario information prior to confirming or sharing additional scenario information.
 4. Prompting may be appropriate after participants have made errors in order to avoid negative training.
 - Any prompting shall be documented in the Corrective Action Program and discussed during the critique.
 5. If specific scenario related data would not be available or could not be obtained in the available time under real conditions, then ensure data is not provided.
 - If the process of obtaining the information is not related to an objective, or the drill or exercise duration will not be sufficient to obtain it, then an exception for providing the data may be made.
 6. Site Evaluators at the Control Room simulator, the TSC and the EOF for the purpose of observing and evaluating drill and exercise emergency classification and notification opportunities while their facility is in command and control of classification and notification designated to be counted for NRC performance indicators.

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5.1.2 Controller and Evaluator Briefing (continued)

7. Ensure the Evaluator primary focus is observing all activities associated with classification and notification of emergencies to accurately score NRC performance indicator opportunities.
 - a. Coordinate between facilities using data sheets or other forms of messaging for the following conditions:
 - To supplement data provided by simulator or data acquisition systems
 - In the event of a simulator, SPDS, or other information system failure
 - b. Use a breakout session for the following:
 - Special facility or function instructions
 - Assignment of specific areas to be evaluated
 - Assignment of specific objectives to be evaluated
 - To report times and critique schedule
8. Address any changes in the drill or exercise and answer final questions.

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5.1.3 ERO Participant Briefing

NOTE

- Emergency Preparedness is a team oriented task and proper interaction between members ensures the transfer of knowledge, skills, and improves team dynamics.
- The following discussion points/items may result in pre-conditioning drill participants and should be avoided during the Participant Briefing:
 - ◇ Operating Experience (OE) that is directly related to elements of the drill
 - ◇ Recent Emergency Preparedness Program changes
 - ◇ Reminders or prompts on how to perform specific tasks or functions

1. Conduct an ERO participant briefing that includes the following minimum agenda items:
 - Scope of participation
 - Ground rules
 - The earning of information
 - ALARA considerations
 - Maintaining a six inch rule
 - ◇ Individuals performing simulated activities involving plant equipment shall maintain a six inch standoff from all plant equipment (including equipment labels)
 - All communications in public areas (e.g., face to face, telephone, facsimiles) must begin with "this is a drill"

5.1.4 Operator Participant Briefing

1. Ensure an Operator Participant Briefing is performed with the following personnel:
 - Operating Crew
 - Control Room Controllers and Evaluators
 - Participating Non-Licensed Operators
2. Ensure the Operator Participant Briefing is performed per Operations Training Requirements on the day of the scenario prior to walking down the Simulator or Main Control Boards and shift turnover:

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5.2 Drill and Exercise Records

1. Maintain a drill records package for each exercise and drill including at a minimum, the following:
 - Scenario manual
 - Scenario critique report
 - Material supporting performance indicator determinations (e.g., Emergency Notification Forms (ENF), sign-in sheets)
 - A record of the Pass or Fail status of all graded performance objectives and a record of any unsatisfactory demonstration criteria (this may be included as part of the scenario critique report)
 - Applicable key data supporting the evaluation of performance objectives and demonstration criteria (e.g., participant logs or forms, ENFs, NRC notification forms)
2. Maintain a record of exercises conducted during each eight year exercise cycle that documents the content of scenarios used to comply with the exercise cycle requirements.
3. Ensure records are detailed enough to support a conclusion that tested objectives were met. At a minimum, records should include the following:
 - Content of scenario elements
 - Sequence and timeline of events
 - Extent of ERO participation and objectives to be demonstrated
 - Opportunities for ERO to demonstrate key skills
 - Expected radiological release conditions
 - Demonstrated dose assessment and dose assessment results
 - Expected onsite and offsite radiological survey activity and results

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6.0 RECORDS

1. The following records are generated by this procedure:
 - Attachment 2, Controller and Evaluator Assignments (Example)
 - Drill and event participation rosters similar to Attachment 4, Drill and Event Participation Roster (Example)

7.0 REFERENCES

7.1 Commitments

None

7.2 Procedures

1. [BNP] [0ERP](#), Radiological Emergency Response Plan
2. [HNP] [PLP-201](#), Emergency Plan
3. [RNP] [PLP-007](#), Robinson Emergency Plan

7.3 Miscellaneous Documents

1. 10 CFR 50.4, Written Communications
2. 10 CFR 50.47, Emergency Plans
3. 10 CFR 50 Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities
4. [CNS] Emergency Plan (Section N)
5. [MNS] Emergency Plan (Section N)
6. [ONS] Emergency Plan (Section N)
7. FEMA REP Exercise Scenario Review Checklist
8. FEMA-REP-1028, Radiological Emergency Preparedness Program Manual
9. IER L1 11-1 Supplement 1 Recommendation 4, Fukushima Daiichi Nuclear Station Fuel Damage Caused by Earthquake and Tsunami - Supplement 1

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7.3 Miscellaneous Documents (continued)

10. IER L2 11-39, Lack of Timely Emergency Response Organization and Emergency Response Facility Activation
11. IER L2 11-39, Rec. 1., Develop performance standards to minimize the time needed to perform the tasks to augment the ERO
12. INPO 08-007, Emergency Preparedness Manual
13. INPO 14-003, Emergency Drill and Exercise Guideline
14. INPO 12-013, Performance Objectives and Criteria
15. INPO 99-1, Loss of Grid - Addendum
16. Letter July 22, 1994 from W. E. Cline (NRC) to W. R. Robinson (CP&L) titled Submission of Emergency Preparedness Exercise Scope, Objectives and Scenarios
17. Letter October 11, 1984 from R. C. Lewis (NRC) to Mr. E. E. Utley (CP&L) titled Submittal of Annual Emergency Exercise Objectives and Detailed Scenarios
18. Letter RNP-RA/05-0082, Response to NRC Bulletin 2005-02, Emergency Preparedness and Response Actions for Security-Based Events
19. NEI 06-04, Conducting a Hostile Action-Based Emergency Response Drill
20. NEI 11-05, Guidelines for Implementation of NRC EP Rule Changes and Interim Staff Guidance
21. NRC IN 87-54, Emergency Response Exercises
22. NRC RIS 2008-08, Endorsement of Revision 1 to Nuclear Energy Institute Guidance Document NEI 06-04, 'Conducting a Hostile Action-Based Emergency Response Drill'. dated March 19, 2008
23. NUREG / CR-3365, Report to the NRC on Guidance for Preparing Scenarios for Emergency Preparedness Exercises at Nuclear Generation Stations
24. RIS 2006-03, Guidance for Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements

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ATTACHMENT 1

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<< Controller - Evaluator Briefing Outline (Example) >>

1. Take-A-Minute
2. Definitions of Key Terms
a. Drill
b. Exercise
c. Comparison
d. Controllers
e. Evaluators
f. Players
g. Observers
3. Exercise Manual Basic Components
a. Drill and Exercise Objectives
b. MSEL
c. Messages
d. Data Sheets
e. Good Practices
4. Drill and Exercise Controller and Evaluator Organization and Responsibilities
a. Drill or Exercise Director
b. Facility Lead Controllers
c. Controllers
d. Evaluators
5. Evaluation Package
a. Objective Evaluation Worksheets
b. Player Feedback Forms
c. Critique
6. General Guidelines: Drill and Exercise Controllers and Evaluators
a. Controllers
b. Players
c. Evaluators
d. Observers
7. Safety Precautions
8. Summary

<< Controller and Evaluator Assignments (Example) >>

Position/Location	Name	Position/Location	Name
Ex Lead Controller (Drill Exercise Coordinator)		EOF	
		Lead Evaluator (Fleet EP Manager)	
On-site Lead Eval (EPM)		Accident Assessment Evaluator	
Control Room (Simulator)		Radiation Protection Evaluator	
Lead Evaluator (Trng Inst)		Communication Evaluator	
Operations Evaluator (Ops Management)		Admin Evaluator	
Simulator Operator		EOF Lead Controller (Fleet EP)	
CR Sim Controller			
TSC		JIC	
Lead Evaluator		Lead Evaluator	
Tech Evaluator		Mock Media / Rumor Control Evaluator	
Rad Evaluator		Briefings Evaluator	
Ops Evaluator		JIC Lead Controller	
Maint Evaluator		Control Cells	
Security Evaluator		Control Cell Controller	
Admin Evaluator		Emergency Notification System (ENS)	
TSC Lead Controller		Health Physics Network (HPN)	
OSC		State Emergency Operations Center (EOC)	
Lead Evaluator		County EOC	
Evaluator		County EOC	
OSC Controller		INPO/ANI	
In-Plant Team Controllers		Field Monitoring Teams (FMT) Environmental Monitoring Team (EnMon)	
Mech Maint		FMT/EnMon Controller/Evaluator	
Mech Maint		FMT/EnMon Controller/Evaluator	
Elect Maint			
Elect Maint		Other	
I&C Maint			
RP			
RP			
RP			
RP			
Equip/Aux OPs			
Equip/Aux OPs			

- All members of the Scenario Development Team are expected to serve as controllers or evaluators.
- Personnel selected to be offsite controllers should also be assigned to the control cell for scenarios that simulate offsite agency interfaces.

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ATTACHMENT 3
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<< Scenario Day Facilities Activities List (Example) >>

Facility:	Drill #:	
Description		Check Done
Communications		
Verify all controller clocks, including those in at EOCs, are in synchronization. (scenario start zero)		
Telephone system is set up for drill-day activities (e.g., simulator EP phone setup corresponds with Control Room configuration.)		
Phone available for lead controller bridge hook-up.		
Controller phones are charged and active.		
Any specialty information is ready for distribution to the participants.		
Verify phone lists and phone labels are correct and available to participants.		
PA system is correctly configured for drill-day activities.		
Radio system is set up for drill-day activities.		
Notify NRC HQ Operations Officer (301-816-5100) of planned exercise start or stop.		
ERDS is operable in drill mode.		
Facility Logistics		
Validate the procedures are the correct revision (e.g., Ops Procedures in CR Sim may be frozen procedures)		
Ensure consumable materials are stocked with proper amount of forms, etc.		
ERO badges or other form of identification (participants, controllers, evaluators, etc.)		
Ensure that any computer links are working from the simulator (onsite and offsite facilities)		
Ensure that a drill incident is setup in WebEOC.		
Verify attendance sheets & comment forms are available in sufficient numbers.		
Post Drill Termination		
Perform post-event facility restoration (use quarterly surveillance or equivalent)		
Telephone system is restored to pre-drill configuration.		
Radio system is restored to pre-drill configuration.		
PA system is restored to pre-drill configuration.		
Notify NRC HQ Operations Officer of exercise termination.		
ERDS is restored to pre-drill configuration.		
Review WEBEOC incidents for actual events to ensure no ENFs were created by drill participants using the wrong incident.		

ATTACHMENT 4

<< Drill and Event Participation Roster (Example) >>

Site: _____ Name: _____ Date: _____

1. Participation credit may be achieved by Participating (P), Mentoring (M), Evaluating (E), or Controlling (C), but not merely observing.
2. Document nature of participation by circling (P), (M), (E), or (C) next to your name.
3. Attachment 4 may be modified and utilized to document the nature of other Emergency Response Facility (ERF) personnel participation.

Position Title	Participant #1 (Name/ID)	Participant #2 (Name/ID)	Participant #3 (Name/ID)	Participant #4 (Name/ID)
Accident Assessment Interface	P M C E	P M C E	P M C E	P M C E
Accident Assessment Manager	P M C E	P M C E	P M C E	P M C E
Data Coordinator	P M C E	P M C E	P M C E	P M C E

<< Drill and Event Participation Roster (Example) >>

Position Title	Participant #1 (Name/ID)	Participant #2 (Name/ID)	Participant #3 (Name/ID)	Participant #4 (Name/ID)
Dose Assessor	P M C E	P M C E	P M C E	P M C E
Emergency Planner	P M C E	P M C E	P M C E	P M C E
EOF Director	P M C E	P M C E	P M C E	P M C E
Assistant EOF Director	P M C E	P M C E	P M C E	P M C E
Field Monitoring Coordinator	P M C E	P M C E	P M C E	P M C E

<< Drill and Event Participation Roster (Example) >>

Position Title	Participant #1 (Name/ID)	Participant #2 (Name/ID)	Participant #3 (Name/ID)	Participant #4 (Name/ID)
Radio Operator	P M C E	P M C E	P M C E	P M C E
Log Recorder	P M C E	P M C E	P M C E	P M C E
Corporate Communications	P M C E	P M C E	P M C E	P M C E
EOF Services Manager	P M C E	P M C E	P M C E	P M C E
EOF Services Admin/Commissary	P M C E	P M C E	P M C E	P M C E

<< Drill and Event Participation Roster (Example) >>

Position Title	Participant #1 (Name/ID)	Participant #2 (Name/ID)	Participant #3 (Name/ID)	Participant #4 (Name/ID)
Offsite Agency Communicator	P M C E	P M C E	P M C E	P M C E
OPS Interface	P M C E	P M C E	P M C E	P M C E
Rad. Assessment Manager	P M C E	P M C E	P M C E	P M C E
Reactor Physics	P M C E	P M C E	P M C E	P M C E