



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION II  
245 PEACHTREE CENTER AVENUE NE, SUITE 1200  
ATLANTA, GEORGIA 30303-1257

June 9, 2016

Mr. Keith Taber  
Site Vice President  
Southern Nuclear Operating Company, Inc.  
Vogtle Electric Generating Plant  
7821 River Road  
Waynesboro, GA, 30830

**SUBJECT: VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 – U.S. NUCLEAR  
REGULATORY COMMISSION EMERGENCY PREPAREDNESS INSPECTION  
REPORT 05000424/2016502 AND 05000425/2016502**

Dear Mr. Taber:

On May 13, 2016, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Vogtle Electric Generating Plant, Units 1 and 2. The enclosed inspection report (IR) documents the inspection results that were discussed on May 13, 2016, with you and members of your staff.

This report documents one NRC-identified finding of very low safety significance (Green). The finding involved a violation of NRC requirements. Because of the very low safety significance, and because the issue was entered into your corrective action program, the NRC is treating the issue as a non-cited violation (NCV) consistent with Section 2.3.2.a of the NRC Enforcement Policy.

If you contest the violation or significance of the NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001; with copies to the Regional Administrator Region II; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Vogtle Plant.

If you disagree with the cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the Regional Administrator, Region II; and the NRC Resident Inspector at the Vogtle Plant.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public inspections, exemptions, requests for withholding," of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its Enclosure, and your response if any, will be available electronically for public inspection in the NRC's Public Document Room, or from the Publicly

Available Records (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS); accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

***/RA: Adam D. Nielsen for/***

Brian R. Bonser, Chief  
Plant Support Branch 1  
Division of Reactor Safety

Docket Nos. 50-424 and 50-425  
License Nos. NPF-68 and NPF-81

Enclosure:  
NRC IR 05000424 and 425/2016502  
w/Attachment: Supplementary Information

cc: Distribution via Listserv

Available Records (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS); accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

***/RA: Adam D. Nielsen for/***

Brian R. Bonser, Chief  
Plant Support Branch 1  
Division of Reactor Safety

Docket Nos. 50-424 and 50-425  
License Nos. NPF-68 and NPF-81

Enclosure:  
NRC IR 05000424 and 425/2016502  
w/Attachment: Supplementary Information

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**U.S. NUCLEAR REGULATORY COMMISSION**

**REGION II**

Docket Nos: 05000424 and 05000425

License Nos: NPF-68 and NPF-81

Report Nos: 05000424/2016502 and 05000425/2016502

Licensee: Southern Nuclear Operating Company, Inc.

Facility: Vogtle Electric Generating Plant, Units 1 and 2

Location: Waynesboro, GA

Dates: May 9–13, 2016

Inspectors: Steven P. Sanchez, Senior Emergency Preparedness Inspector  
Christopher A. Fontana, Emergency Preparedness Inspector  
John D. Hickman, Emergency Preparedness Inspector (Trainee)  
Wade T. Loo, Senior Health Physicist  
Thomas A. Stephen, Acting Senior Resident Inspector

Approved by: Brian R. Bonser, Chief  
Plant Support Branch 1  
Division of Reactor Safety

Enclosure

## SUMMARY

Inspection Report (IR) 05000424/2016502 and 05000425/2016502; 5/9/2016 – 5/13/2016;  
Vogtle Electric Generating Plant, Units 1 and 2; Exercise and Baseline Inspection

This report covers an inspection by three emergency preparedness inspectors, one senior resident inspector, and one senior health physicist. The significance of inspection findings are indicated by their color (i.e., greater than Green, or Green, White, Yellow, or Red) and determined using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process," (SDP) dated April 29, 2015. Cross-cutting aspects are determined using IMC 0310, "Aspects Within the Cross-Cutting Areas," dated December 4, 2014. All violations of NRC requirements were dispositioned in accordance with the NRC's Enforcement Policy dated February 4, 2015. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 5.

### NRC-Identified and Self-Revealing Findings

Cornerstone: Emergency Preparedness

Green: The inspectors identified a non-cited violation (NCV) of Title 10 of the Code of Federal Regulations (CFR), Part 50.54(q)(2), for the licensee's failure to maintain the effectiveness of its emergency plan by ensuring that adequate emergency facilities and equipment to support emergency response are provided and maintained as required by 10 CFR 50.47(b)(8). Specifically, the effectiveness of the emergency plan was reduced by a change to the Technical Support Center (TSC) functionality requirements in Technical Requirements Manual (TRM) TR 13.13.1, Emergency Response Facilities, Revision 1. The requirement to maintain climate control was removed without an adequate basis to support removal. The procedure change had been in place since September 2013, and until a corrected revision is issued, a Standing Order has been put in place. The licensee entered this finding into the corrective action program (CAP) as condition report (CR) 10221041.

The inspectors determined that the performance deficiency was more than minor because it was associated with the procedure quality attribute of the Emergency Preparedness (EP) cornerstone, adversely affected the associated cornerstone objective, and would have affected the emergency response organization's ability to effectively perform their duties had an emergency been declared and TSC climate control non-functional. The finding was evaluated using the EP significance determination process and was identified as having very low safety significance (Green) because it was a failure to comply with NRC requirements and was not a loss of the planning standard function or the overall function of the TSC. The finding was associated with a cross-cutting aspect in the Change Management component of the Human Performance area because the licensee failed to use a systematic process for evaluating and implementing change so that nuclear safety remains the overriding priority. [H.3] (Section 1EP4)

## REPORT DETAILS

### 1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

#### 1EP1 Exercise Evaluation

##### a. Inspection Scope

The onsite inspection consisted of the following review and assessment:

- The adequacy of the licensee's performance in the biennial exercise, conducted on May 11, 2016, was reviewed and assessed regarding the implementation of the Risk Significant Planning Standards in 10 CFR 50.47(b)(4), (5), (9), and (10); which address emergency classification, offsite notification, radiological assessment, and protective action recommendations, respectively.
- The overall adequacy of the licensee's emergency response facilities with regard to NUREG-0696, "Functional Criteria for Emergency Response Facilities," and Emergency Plan commitments. The facilities assessed were the Control Room Simulator, Technical Support Center, Operations Support Center, and Emergency Operations Facility.
- Other performance areas, such as the emergency response organization's (ERO) recognition of abnormal plant conditions; command and control, intra- and inter-facility communications; prioritization of mitigation activities; utilization of repair and field monitoring teams; interface with offsite agencies; and the overall implementation of the emergency plan and its implementing procedures.
- Past performance issues from NRC inspection reports and Federal Emergency Management Agency (FEMA)/Department of Homeland Security (DHS) exercise reports to determine the effectiveness of corrective actions as demonstrated during this exercise to ensure compliance with 10 CFR 50.47(b)(14).
- The post-exercise critique process and the presentation to the licensee's senior management conducted on May 12, 2016, to evaluate the licensee's self-assessment of its ERO performance during the exercise, and to ensure compliance with 10 CFR Part 50, Appendix E, Subsection IV.F.2.g.

The inspectors reviewed various documents, which are listed in the Attachment. The inspectors also attended the FEMA-sponsored public meeting on May 13, 2016. This inspection activity satisfied one inspection sample for the exercise evaluation on a biennial basis.

##### b. Findings

No findings were identified.

## 1EP4 Emergency Action Level and Emergency Plan Changes

### a. Inspection Scope

Since the last NRC inspection of this program area, two revisions to the emergency plan and several revisions to emergency plan implementing procedures had been made. The licensee determined that, in accordance with 10 CFR 50.54(q), the Plan continued to meet the requirements of 10 CFR 50.47(b), and Appendix E to 10 CFR Part 50. The inspectors reviewed the revisions, and sampled implementing procedure changes to evaluate potential reductions in the effectiveness of the Plan. As this review was not documented in a Safety Evaluation Report, and does not constitute formal NRC approval of the changes, these changes remain subject to future NRC inspection in their entirety.

The inspection was conducted in accordance with NRC Inspection Procedure (IP) 71114, Attachment 04, Emergency Action Level and Emergency Plan Changes. The applicable planning standards of 10 CFR 50.47(b), and its related requirements in 10 CFR Part 50, Appendix E, were used as reference criteria.

The inspectors reviewed various documents, which are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the emergency action level and emergency plan changes on an annual basis.

### b. Findings

Introduction: The inspectors identified a green non-cited violation (NCV) of Title 10 of the Code of Federal Regulations (CFR), Part 50.54(q)(2), for the licensee's failure to maintain the effectiveness of its emergency plan by ensuring that adequate emergency facilities and equipment to support emergency response are provided and maintained as required by 10 CFR 50.47(b)(8). Specifically, the effectiveness of the emergency plan was reduced by a change to the Technical Support Center (TSC) functionality requirements in Technical Requirements Manual (TRM) TR 13.13.1, Emergency Response Facilities, Revision 1.

Description: During the performance of the February 17, 2016, quarterly drill, the inspectors noted elevated temperatures in the TSC and questioned the functionality of the TSC. Upon review of TRM TR 13.13.1, Emergency Response Facilities, it was identified that the requirement to maintain climate control was removed in September 2013. One of the TSC functionality requirements was changed from "the ventilation system for filtration and *climate* control" to "the ventilation system for filtration and *radiological* control". The goal of the change, annotated in Licensing Document Change Request 2013017, was to provide more definitive guidance with regard to circumstances that require the TSC to be declared non-functional due to loss of any climate control function and thus eliminating the need for an 8-hour report to the NRC. Further inspection of the 10 CFR 50.54 (q) evaluation determined that the removal of the functionality requirement for the TSC to maintain climate control was incompletely considered.

The Vogtle Electric Generating Plant Emergency Plan states that the TSC had been established consistent with NUREG-0696, Functional Criteria for Emergency Response Facilities (ERF), and that the ventilation system provides filtered cooling air during accident conditions. NUREG-0696 further states that ERF ventilation systems shall

function in a manner comparable to the control room ventilation system. The Technical Specification Bases states each Control Room Emergency Filtration System train is capable of maintaining control room temperature  $\leq 85^{\circ}\text{F}$ . The Final Safety Analysis Report, Section 9.4.1.8, Onsite TSC Heating Ventilation and Air Conditioning (HVAC), states that the HVAC system provides a supply of cooling air sufficient to maintain area temperatures at  $75\pm 5^{\circ}\text{F}$ . Additionally, NUREG 0737, Clarifications of Three Mile Island Action Plan Requirements, states that the TSC will be environmentally controlled to provide room air temperature, humidity, and cleanliness appropriate for personnel and equipment. The inspectors reviewed the temperature records of the TSC since May of 2013 and did not identify any prolonged periods (longer than 2 days) of temperatures greater than  $85^{\circ}\text{F}$ .

Analysis: The licensee's failure to adequately maintain their emergency plan was a performance deficiency. Specifically, the effectiveness of the emergency plan was reduced by a change to the TSC functionality requirements in TRM TR 13.13.1, Emergency Response Facilities, Revision 1, when the requirement to maintain climate control was removed without an adequate basis to support removal. The inspectors determined that the performance deficiency was more than minor using NRC Inspection Manual Chapter (IMC) 0612, Appendix B, Issue Screening, because the performance deficiency was associated with the procedure quality attribute of the Emergency Preparedness (EP) cornerstone, adversely affected the associated cornerstone objective, and would have affected the emergency response organization's ability to effectively perform their duties had an emergency been declared and TSC climate control non-functional. The finding was evaluated using the EP significance determination process and was identified as having very low safety significance (Green) because it was a failure to comply with NRC requirements and was not a loss of the planning standard function or the overall function of the TSC. The finding was associated with a cross-cutting aspect in the Change Management component of the Human Performance area because the licensee failed to use a systematic process for evaluating and implementing change so that nuclear safety remains the overriding priority. [H.3]

Enforcement: Title 10 CFR 50.54(q)(2) requires, in part, that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain the effectiveness of an emergency plan which meets the requirements in Appendix E to this part and the Planning Standards of 50.47(b). Title 10 CFR 50.47(b)(8) requires, in part, that adequate emergency facilities and equipment to support emergency response are provided and maintained. Contrary to the above, the licensee potentially reduced the ability of the TSC staff to adequately respond to an emergency condition by removing the climate control requirements for the TSC. Specifically, the effectiveness of the emergency plan was reduced by a change to the TSC functionality requirements in TRM TR 13.13.1, Emergency Response Facilities, Revision 1, when the requirement to maintain climate control was removed without an adequate basis to support removal. The procedure change had been in place since September 2013, and until a corrected revision is issued, a Standing Order has been put in place. The licensee entered the issue into their Corrective Action Program (CAP) as CR 10221041. Because this failure is of very low safety significance (Green) and has been entered into the licensee's CAP, this violation is being treated as a NCV, consistent with Section 2.3.2.a of the NRC Enforcement Policy: NCV 05000424/2016502-01, 05000425/2016502-01, "Failure to Adequately Maintain Emergency Response Facilities."



## 1EP8 Exercise Evaluation – Scenario Review

### a. Inspection Scope

Prior to the inspection activity, the inspectors conducted an in-office review of the exercise objectives and scenario submitted to the NRC using IP 71114.08, "Exercise Evaluation - Scenario Review," to determine if the exercise would test major elements of the emergency plan as required by 10 CFR 50.47(b)(14).

The inspectors reviewed various documents, which are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the exercise evaluation on a biennial basis.

### b. Findings

No findings were identified.

## 4. OTHER ACTIVITIES

### 4OA1 Performance Indicator Verification

#### a. Inspection Scope

The inspectors sampled licensee submittals relative to the performance indicators (PIs) listed below for the period April 1, 2015, through March 31, 2016. To verify the accuracy of the PI data reported during that period, PI definitions and guidance contained in Nuclear Energy Institute 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7, was used to confirm the reporting basis for each data element.

#### Emergency Preparedness Cornerstone

- Drill/Exercise Performance (DEP)
- Emergency Response Organization (ERO) Readiness
- Alert and Notification System (ANS) Reliability

For the specified review period, the inspectors examined data reported to the NRC, procedural guidance for reporting PI information, and records used by the licensee to identify potential PI occurrences. The inspectors verified the accuracy of the PIs for ERO and DEP through review of a sample of drill and event records. The inspectors reviewed selected training records to verify the accuracy of the PI for ERO drill participation for personnel assigned to key positions in the ERO. The inspectors verified the accuracy of the PI for ANS reliability through review of a sample of the licensee's records of periodic system tests. The inspectors also interviewed the licensee personnel who were responsible for collecting and evaluating the PI data. Licensee procedures, records, and other documents reviewed within this inspection area, are listed in the Attachment.

This inspection satisfied three inspection samples for PI verification on an annual basis.

b. Findings

No findings were identified.

4OA6 Meetings

On May 13, 2016, the inspection team presented the inspection results to Mr. K. Taber and other members of the plant staff. The inspectors confirmed that no proprietary information was provided during the inspection.

ATTACHMENT: Supplementary Information

**SUPPLEMENTARY INFORMATION**

**KEY POINTS OF CONTACT**

Licensee personnel

S. Briggs, Operations Director  
M. Brett, Emergency Preparedness Specialist  
G. Gunn, Regulatory Affairs Manager  
J. Hall, Emergency Preparedness Supervisor (Units 3 and 4)  
M. Hayden, Emergency Preparedness Supervisor  
M. Johnson, Radiation Protection Manager  
L. Mansfield, Fleet Emergency Preparedness Manager  
M. Redden, Emergency Preparedness Specialist  
K. Taber, Site Vice President  
K. Walden, Licensing Engineer  
J. Williams, Site Integration Director

**LIST OF ITEMS OPENED, CLOSED AND DISCUSSED**

Opened and Closed

05000424/2016502-01, 05000425/2016502-01	NCV	Failure to Adequately Maintain Emergency Response Facilities (Section 1EP4)
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## LIST OF DOCUMENTS REVIEWED

### 1EP1 Exercise Evaluation

#### Procedures

Vogtle Electric Generating Plant Units 1 and 2 Emergency Plan, Rev. 65  
91101-C, Emergency Response Organization, Version 32  
91103-C, Duties of the TSC Manager, Version 27  
91104-C, Duties of the OSC Manager, Version 27.0  
91106-C, Duties of the TSC Support Coordinator, Version 18.1  
NMP-EP-101, Emergency Operations Facility (EOF), Activation, Version 4.0  
NMP-EP-102, EOF Manager, Version 7.0  
NMP-EP-103, Dose Assessment, Version 8.0  
NMP-EP-110, Emergency Classification Determination and Initial Action, Version 8.1  
NMP-EP-111, Emergency Notifications, Version 11.0  
NMP-EP-112, Protective Action Recommendations, Version 5.1  
NMP-EP-303, Drills and Exercise Standards, Version 17.0  
NMP-EP-303-F05, Drill and Exercise Objectives, Version 1.1

#### Records and Data

Vogtle Electric Generating Plant Units 1 and 2, 2016 Emergency Preparedness Biennial Exercise Scenario  
Control Room Simulator, Operations Support Center, Technical Support Center, and Emergency Operations Facility/Joint Information Center - Documentation packages (logs, event notification forms, Protective Action Recommendations, Media releases, and Radiological Dose Assessments)

#### Corrective Action Program Documents (Condition Reports)

10222218, During the Vogtle evaluated exercise, timely dose projections were not performed  
10222220, Create hook in Offsite Dose Assessment Enhanced Dose Assessment Menu B procedure to drive user to F20 Offsite Dose Assessment Vogtle Steam Generator Tube Rupture  
10222400, Need dose assessment training for using Back Calculations  
10222446, An inaccurate time for the SAE declaration was shared with the public  
10222496, 2016 graded exercise-player missing post exercise critique  
10222502, 2016 graded exercise-PA announcement for SAE made late from TSC  
10222503, 2016 graded exercise-conflicting data reported for core damage  
10222504, 2016 graded exercise-OSC facility issues  
10222510, 2016 graded exercise-the ENN receipt confirmation times recorded in WebEOC were not consistent  
10222511, 2016 graded exercise-TSC did not man HPN after repeated NRC requests  
10222513, 2016 graded exercise-OSC did not completely control facility access for contamination control  
10222515, 2016 graded exercise-TSC facility issues  
10222519, 2016 graded exercise-emergency release termination not performed in a timely manner  
10222520, 2016 graded exercise-follow-up for SAE was not transmitted within 60 minutes  
10222521, 2016 graded exercise-communication gaps led to organizational differences in documented times for SAE declaration  
10222522, 2016 graded exercise-proficiency gaps for ENS communications  
10222526, 2016 graded exercise-failure to notify all state & local agencies within 15 minutes

10222528, 2016 graded exercise-instances of incorrect information being disseminated from the TSC/EOF

10222557, A simulator interruption of approximately 18 minutes occurred during E-Drill

10226112, Proficiency weaknesses of EOF dose analysts resulted in unsatisfactory demonstration criteria & a minor NRC violation

#### 1EP4 Emergency Action Level and Emergency Plan Changes

##### Procedures

Vogtle Electric Generating Plant Units 1 and 2 Emergency Plan, Revisions 64, 65, & 66  
13303-C, TSC & CAS HVAC Systems, Version 2.2

NMP-AD-008, Applicability Determinations, Version 20.0

NMP-EP-110-GL03, VEGP EALs – ICs, Threshold Values, & Basis, Version 5.2

NMP-EP-310, Maintaining the Emergency Plan, Version 4.1

##### Change Packages

Licensing Document Change Request (LDCR) 2014047, Vogtle Electric Generating Plant  
Units 1 and 2 Emergency Plan, Rev. 65, 50.54(q) Screening/Evaluation, dated 8/5/15

LDCR 2016014, Vogtle Electric Generating Plant Units 1 and 2 Emergency Plan, Rev. 66,  
50.54(q) Screening/Evaluation, dated 4/20/16

#### 1EP8 Exercise Evaluation

##### Procedures

Vogtle Electric Generating Plant Units 1 and 2 Emergency Plan, Rev. 65

NMP-EP-108, Offsite Response Coordinator, Version 3.0

NMP-EP-110, Emergency Classification Determination and Initial Actions, Version 8.1

NMP-EP-303-F05, Drill and Exercise Objectives, Version 1.1

##### Records and Data

Vogtle Electric Generating Plant Units 1 and 2 2016 Emergency Preparedness Biennial  
Exercise Scenario

NOEP-0235, Critique of MS-1 Drill for Burke Medical Center and Burke EMS, dated 7/13/2015

Vogtle 8 Year IC Tracking Spreadsheet, dated 2/17/16

Vogtle 8 Year Drill Objective Tracking Spreadsheet, dated 2/17/16

NOEP-0242, 2015 first, second, third, and fourth quarters, and 2016 first quarter recall /  
communications drill reports

#### 4OA1 Performance Indicator Verification

##### Procedures

00163-C, NRC Performance Indicator and Monthly Operating Report Preparation and Submittal,  
Rev. 14.6

NMP-EP-300, SNC Emergency Preparedness Conduct of Operations, Version 21.0

NMP-EP-310, Maintaining the Emergency Plan, Version 3.1

NMP-EP-311, SNC EP Tier 4 Performance Indicators, Version 2.0

NMP-GM-002, Corrective Action Program, Version 12.1

NMP-GM-002-001, Corrective Action Program Instructions, Version 34.0

NMP-GM-002-GL03, Cause Analysis & Corrective Action Guideline, Version 26.1

NMP-GM-013-002, Performance Assessment and Trending, Version 5.0

Records and Data

DEP opportunities documentation for second, third, and fourth Quarters 2015, and first quarter 2016

Siren test data for second, third, and fourth Quarters 2015, and first quarter 2016

Drill and exercise participation records of ERO personnel for second, third, and fourth Quarters 2015, and first quarter 2016

Corrective Action Program Documents

249494, ERO member on roster with incomplete qualification

769402, ERO positions are not always filled prior to the start of the muster meetings

781192, ERO respondents who signed in as backshift were not present for roll call

782960, ENN telephone failure

784032, Revise NMP-EP-104 (Dose Assessment) to reflect Corp. Health Physics

867168, Establishment of ERDS Activation from the Control Room

908840, Critique item – November 2014 Facility Activation Drill

913320, NMP-EP-104, "Dose Assessment", version 6.1 requires revision

943058, Vogtle ETE annual review

10012806, 8/15/15 ERO weekly scheduled updated improperly

10150858, Siren B29 spurious rotor fail alarm

10150859, Siren B29 Spurious Rotor Fail Alarm

10163686, ERO dose assessment supervisor qualification lapsed

10192122, ANS reported data for November 2015 needs re-evaluated

10192126, DEP PI reported data does not match the submitted PI documentation

## **LIST OF ACRONYMS USED**

ADAMS	Agencywide Documents Access and Management System
ANS	Alert and Notification System
CAP	Corrective Action Program
CFR	Code of Federal Regulations
DEP	Drill and Exercise Performance
DHS	Department of Homeland Security
ERO	Emergency Response Organization
FEMA	Federal Emergency Management Agency
IMC	Inspection Manual Chapter
IP	Inspection Procedure
NCV	Non-Cited Violation
NRC	Nuclear Regulatory Commission
PIM	Plant Issues Matrix
PI	Performance Indicator
PI&R	Problem Identification and Resolution
ROP	Reactor Oversight Process
SDP	Significance Determination Process
SUNSI	Sensitive Unclassified Non-Safeguards Information
TBD	To Be Determined
TI	Temporary Instruction
VIO	Violation