

FAQ 13-07 Final Approved
Correctly Scoring Classification Opportunities (DCPP)

Plant: DCPD

Date of Event:

Submittal Date: April 23, 2013

Contact: Brian Ashbrook **Tel/email:** 805.545.6279 bka4@pge.com

NRC Contact: Tel/email:

Performance Indicator: EP01, Drill/Exercise Performance

Site-Specific FAQ (Appendix D)? No

FAQ requested to become effective: This FAQ is effective immediately for Diablo Canyon. For other licensees, the changes to NEI 99-02 will be effective on April 1, 2014, meaning that licensees will begin applying this FAQ resolution to 2Q2014 data reported to NRC in July 2014.

Question Section

NEI 99-02 Guidance needing interpretation (include page and line citation):

Page 44, Lines 19 & 20:

“Timely means:

- classifications are made consistent with the goal of 15 minutes once available parameters reach an Emergency Action Level (EAL)...”

Event or circumstances requiring guidance interpretation:

In a license operator requalification simulator session with a simulated earthquake at T=0, the shift manager (SM) emergency coordinator declared to the operations shift at T=7 minutes an Unusual Event (UE). After declaring the event, the SM requested additional information from the operations shift and after additional information was presented to the SM, the SM changed the classification level to the correct classification level, Alert, at T=10 minutes.

The scenario expectation was that only an Alert would be declared, although both the UE EAL threshold and Alert thresholds were exceeded. Because guidance is not clear on how to evaluate a scenario where a subsequent classification is made within 15 minutes of the conditions being available, the licensee reached out to industry subject matter experts. The results were as follows:

- Three individuals concluded: 2 for 2 – the UE declaration was a process error and critiqued, but the Alert declaration was timely and accurate, as was the Alert declaration.
- Three individuals concluded: 2 for 3 – the UE declaration was an unexpected and inaccurate declaration based on the available indications at the time. If the Earthquake Force Monitor (EFM) had been looked at it, it would have been noted that it indicated greater than the Alert level threshold, 0.2g, at 1055.
- One individual concluded: 3 for 4 – the UE was accurate based on the information known at the time; the UE notification was not done and therefore, not timely. The Alert classification and notification were both timely and accurate.
- One individual concluded: 3 for 3 successful opportunities. The UE was accurate based on the information available to the SM at the time. The Alert classification was timely and accurate within 15 minutes of the first indication of an earthquake. The notification was timely and accurate because it was within 15 minutes of the first declaration.

The licensee reviewed current guidance and industry input and graded the Alert classification as a pass. The SM was remediated through the corrective action program for the UE declaration. The results were 2 for 2 (timely and accurate Alert classification and timely Notification within 15 minutes of the Unusual Event declaration).

During Diablo Canyon's Evaluated Exercise week, the NRC reviewed the performance indicator per NRC Inspection Procedure 71151. The inspectors concluded the result was 1 for 2 successful opportunities. This conclusion, different from all 4 industry conclusions, appears to be based on guidance where a subsequent and correct EAL is not recognized within 15 minutes of availability. The reason that the classification is not an opportunity is that the appropriate classification level was not attained in a timely manner. However, in the scenario at DCP, the correct EAL was recognized within 15 minutes.

This condition and others, such as when a scenario is designed where a developer may ramp a process value through a lower emergency classification trigger point (T=0) to a final higher value classification, the lower emergency classification is declared and then modified to the higher classification all within 15 minutes, prompt the need for consistent guidance on how these conditions are scored to ensure the extent of all possible conditions is considered once in this FAQ.

What is the NRC resident inspector's position?

The NRC's EP inspector believed the Alert classification is not counted in the PI and graded the scenario as 1 for 2 (inaccurate UE declaration, timely and accurate notification)

Potentially relevant existing FAQ numbers

None

Response Section

Proposed Resolution of FAQ:

Count as a successful opportunity the subsequent classification recognized and declared accurately within 15 minutes of the original initiating condition and/or when conditions became available to operators. Critique and enter the inadvertent or inaccurate classification in the station's corrective action program. Revise NEI 99-02 as shown below.

Proposed revision to NEI 99-02, Rev. 6, page 46, added to the existing paragraph beginning on line 43:

If the accurate and expected classification is recognized within 15 minutes of the original initiating condition or when conditions became available to operators, then the final classification shall be considered a success and shall be the only opportunity considered in the performance indicator. Any unexpected classification shall be entered in the station's corrective action program and is considered a non-opportunity.

Final NRC Response

The DEP PI statistic is intended to be a test of the licensee's decision maker's ability to make an accurate and timely declaration of an emergency event occurring on site. For this to happen the PI affords 15 minutes from the time the information is available to the decision maker, to the point the declaration decision needs to be completed. 10 CFR 50 Appendix E.IV.C.2 states:

By June 20, 2012, nuclear power reactor licensees shall establish and maintain the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an emergency action level has been exceeded and shall promptly declare the emergency condition as soon as possible following identification of the appropriate emergency classification level. Licensees shall not construe these criteria as a grace period to attempt to restore plant conditions to avoid declaring an emergency action due to an emergency action level that has been exceeded. Licensees shall not construe these criteria as preventing implementation of response actions deemed by the licensee to be necessary to protect public health and safety provided that any delay in declaration does not deny the State and local authorities the opportunity to implement measures necessary to protect the public health and safety.

It is the expectation of the NRC staff that once the licensee decision maker announces the declaration, the decision has been made and should be evaluated base on its accuracy and timeliness (see EPFAQ 2012-002 ADAMS ML12333A281).

NRC Resolution of FAQ

EPFAQ 2012-002 defines the classification clock as beginning when indications are available to the licensee of an emergency action level (EAL) having been met or exceeded and stops when the licensee promptly declares the emergency condition. Since the EAL announcement ends the declaration classification portion of the DEP classification opportunity, the DEP opportunity would be counted as a failure because the declaration was announced incorrectly as a NOUE.

For a scenario in which a correct EAL declaration is made and then changed to an incorrect EAL within the original 15 minute declaration window, it follows that the initial notification of the incorrect EAL classification shall be considered inaccurate for the event and would be counted as a DEP notification PI failure.

Revision to NEI 99-02, Rev. 7, page 48, added to the existing paragraph beginning on line 31:

When a licensee decision maker announces the declaration of an EAL, the DEP classification opportunity is considered complete for both accuracy and timeliness (See EPFAQ 2012-002, ADAMS [ML12333A281](#)). Any subsequent change made to an incorrect or correct declaration within the 15 minute declaration window would not alter the determination of the DEP classification opportunity as a failure or success, respectively. Additionally, if a correct declaration is changed to an incorrect declaration within the 15 minute declaration window, then the initial notification of the incorrect EAL classification shall be considered inaccurate for the event and thus a DEP notification failure.

Effective Date

This FAQ is effective immediately for Diablo Canyon. For other licensees, the changes to NEI 99-02 will be effective on April 1, 2014, meaning that licensees will begin applying this FAQ resolution to 2Q2014 data reported to NRC in July 2014.