

**From:** [Alexander, Ryan](#)  
**To:** [Lewis, Michael L](#); [ELLIS, DAVID R - GGNS](#)  
**Cc:** [Meister, Richard](#); [Haire, Mark](#)  
**Subject:** Request for Information: Grand Gulf EP Exercise Inspection March 2021  
**Date:** Tuesday, December 22, 2020 2:12:50 PM  
**Attachments:** [RFI for GG EP Exercise Insp Mar 2021.pdf](#)

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Mr. Lewis/Mr. Ellis:

As discussed during the inspection planning/kick-off call held today (12/22/2020), attached is the **Request for Information (RFI) in support of the Grand Gulf EP Exercise Inspection which will be conducted the week of March 15, 2021, with some in-office review of the draft exercise scenario to be conducted in January and early February 2021.**

By design, the biennial EP Program inspection includes the use of Inspection Procedures (IP) 71114.01, 71114.08, 71114.04, and 71151, and will assess the station's conduct and critique of the biennial emergency preparedness exercise to be conducted that week.

Details of the requested materials are included in the attachment to this e-mail. Most materials are requested to be made available when onsite for the inspection, while others are requested to be provided prior to the onsite week for in-office inspection/review. If you are unable to complete the requests or have questions regarding them, please contact me at the phone number listed below to discuss.

Further as discussed during the kick-off call, the following describes the meetings, activities, and typical licensee attendees surrounding the exercise which the NRC inspector(s) will conduct and/or observe during the inspection. (Attendee participation in these activities via electronic methods/teleconferences, when appropriate, in support of COVID-19 PHE controls/protections is supported and encouraged.)

Date	Activity	Typical Licensee Attendees
<b>February 10 or 11 (exact date/time TBD)</b>	Inspector feedback on the draft Exercise scenario (per IP 71114.08) will be conducted telephonically or via other remote means	GGNS EP Staff (with a need-to-know of the scenario)
<b>March 15 (afternoon)</b>	Exercise Inspection Entrance Meeting	GGNS EP Management & Staff, Regulatory Affairs, & Other Station Management
<b>March 15 (afternoon)</b>	Final scenario briefing and ERF walkdowns/orientations	GGNS EP Staff (with a need-to-know of the scenario)

<b>March 16 &amp; 17</b>	Observe/Inspect performance of Biennial Plume Phase Exercise, Out-of-Sequence Demonstration Activities (not including the Ingestion Pathway Exercise), and post-exercise facility critiques	GGNS ERO participants, Controllers & Evaluators
<b>March 18, 2021 (late afternoon)</b>	Technical debrief (for non-critique related inspection items)	GGNS EP Management & Staff; Regulatory Affairs
<b>March 18 (very late afternoon) or March 19 (early morning)</b>	Site Management Debrief (associated with non-critique related items) – timing will be dependent on scheduling of FEMA public meeting(s)	GGNS EP Management & Staff, Regulatory Affairs, & Other Station Management
<b>March 19 (times TBD)</b>	FEMA Public Meeting(s) – Conducted by FEMA Regions 4 and 6 personnel to communicate FEMA’s evaluation results for the offsite portion of the exercises. Format TBD – may be in-person or virtual.  The NRC Lead Inspector represents the NRC at the FEMA meeting consistent with IP 71114.01, Sections 2.10 & 3.10	GGNS EP Management/Staff
<b>Date/Time TBD (likely 1-2 weeks after the onsite exercise week)</b>	GGNS EP Staff presentation of the Final Exercise Critique Results to Station Senior Management  (NRC inspectors will not return to the site, but will observe this presentation remotely. Any presentation materials provided to the Station Senior Management should also be provided to the NRC inspectors just prior to the meeting.)	GGNS EP Management & Station Management (as dictated by licensee procedures)
<b>Date/Time TBD (likely 1-2 business days after the Final Exercise Critique Presentation)</b>	Exercise Inspection Exit Meeting (will be conducted telephonically or via other remote means)	GGNS EP Management & Staff, Regulatory Affairs, & Other Station Management

Finally, the NRC Inspection Team is currently slated to include Ryan Alexander (Team Lead), Matt Thomas, Jonathan Braisted, & Ray Lanfear – all of whom will be onsite during the inspection week.

At this point, I do not know of any other NRC observers planning to be onsite for the inspection.

Additionally, it is not uncommon that FEMA evaluators may also observe Offsite Response Organization (ORO) participants who respond to the Entergy/GGNS EOF in the course of the exercise – however the number and names of those individuals are currently unknown to the NRC Lead Inspector. The NRC Lead Inspector will work with the FEMA Regions to ensure Entergy receives applicable information as to which FEMA evaluators will also be onsite during the exercise activities.

This letter/e-mail does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget under control number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

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Respectfully,

**Ryan D. Alexander**

***Sr. Emergency Preparedness Inspector***

NRC Region IV, Div. of Reactor Safety

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**Request for Information for EP Performance Indicator Verification Inspection**

*Docket 05000416 (Grand Gulf) Inspection Report 2021001  
Inspection Procedures 71114.08, 71114.01, 71114.04, and 71151  
Draft Scenario In-Office Review: NLT Jan 15 – Feb 14, 2021  
Onsite/Inspection Week: March 15 – 19, 2021*

Inspectors: Ryan Alexander (Team Lead), Matt Thomas, Jonathan Braisted, & Ray Lanfear

Please provide the following to support the inspection consistent with the methods and timeframes listed for each.

1) IP 71114.08: Exercise Evaluation – Scenario Review

As discussed during the inspection kick-off call on 12/22/2020, upon official submission of the 60-day draft scenario information to the NRC via the EIE submission process (on or before 01/15/2021), please provide the ADAMS Accession Number for the document to the Lead Inspector such that he may ensure all members of the inspection team may obtain access to the draft scenario. [As a contingency, if the EIE submission process is unsuccessful, please promptly contact the Lead Inspector to discuss alternate means to provide the document in a secure, electronic format to the inspection team.]

2) IP 71114.01: Exercise Evaluation

- a) First day of Onsite Inspection (03/15/2021) – Please provide hard/paper copies of the final, full Exercise Manual, one copy per inspector (4 total).
- b) First day of Inspection (03/15/2021) – Provide a single hard copy document of the current Grand Gulf Emergency Plan and complete set of Emergency Plan Implementing Procedures. These will be used/referenced by the inspection team and returned at the conclusion of the exercise inspection week.
- c) No later than 9:00 AM on Wednesday, 03/17/2021 (morning after the exercise) – Provide copies of all documents generated by participants (players, controllers, and evaluators) in the conduct of the exercise on 03/16/2021, separated by Emergency Response Facility (preferred).
- d) No later than 9:00 AM on Thursday, 03/18/2021 (morning after out-of-sequence demonstration) - Provide copies of all documents generated by participants (players, controllers, and evaluators) in the conduct of the out-of-sequence activity on 03/17/2021, separated by Emergency Response Facility (preferred).

*Items 2.e – 2.g may be provided prior to the onsite inspection via the electronic portal of the station's choosing, in hard copy for review starting on the first day of inspection, or combination thereof (whichever is more readily available and convenient for the station):*

- e) Copies of all Drill and Exercise reports since the last biennial EP Exercise in CY2019, including standalone drills, team drills, dress-rehearsals, etc.
- f) In addition, a copy of the 2017 and 2019 Biennial EP Exercise Reports (if not provided as part of Item 2.d).

Enclosure

- g) Listing of all EP-related Corrective Action Documents/CRs generated since the last biennial EP Exercise in CY2019, in a sortable/searchable format. (Specific full CR documents may be subsequently requested based on sampling and review by the inspectors.)

3) IP 71114.04: EAL and Emergency Plan Changes

*Items 3.a – 3.b are requested to be provided approximately two weeks prior to the onsite inspection (03/01/2021) via the electronic portal of the station's choosing:*

- a) Copy of all 50.54(q) evaluations completed since December 2020.
- i. Including copies of all evaluations completed (per 50.54(q) or other corrective action program process) to implement compensatory measures/contingency plans to ensure E-Plan requirements continued to be met during COVID-19 Public Health Emergency (PHE).
- b) Listing of all of 50.54(q) screens performed since December 2020.

4) IP 71151: PI Verification (ERO Participation, DEP, and ANS) – ANNUAL review

- c) Please provide the applicable EP-related Performance Indicator data for:  
**4<sup>th</sup> Quarter 2020 (1 quarter)**

*The bulleted items below include materials and data that licensees may maintain in support of the collection and reporting of the EP-related Performance Indicators. The list is illustrative and may not be all inclusive. In general, the inspectors are requesting access to the specific materials and data that Grand Gulf Station used to report the indicators.*

*Any information provided may be done so prior to the onsite inspection via the electronic portal of the station's choosing, in hard copy for review starting on the first day of inspection, or combination thereof (whichever is more readily available and convenient for the station):*

- Station procedure for Alert & Notification System (ANS) Siren Testing.
- ANS Siren Test reports for the 1 quarter.
- Station procedure(s) for EP Performance Indicator data collection and submission.
- List of the DEP opportunities used in developing the PI values for the 1 quarter.
- All supporting documentation used to assess the DEP opportunities in the 1 quarter, which *may* include: (a) Drill/Exercise/LORT session reports, (b) actual declared emergency reports/assessments (if any), and (c) copies of notification forms associated with each of the DEP opportunities.
- Quarterly qualification rosters (or similar) for the key ERO members who were included in the ERO Participation data for the 1 quarter.

- Qualification records for the key ERO members who were included in the ERO Participation date for the 1 quarter
- If not included in the supporting documentation for DEP opportunities (Item 3.b above), drill/exercise attendance records and any other supporting documentation used to develop the reported ERO participation PI data for 1 quarter.

*Items 4.b – 4.d are requested to be provided approximately two weeks prior to the onsite inspection (03/01/2021) via the electronic portal of the station's choosing:*

- b) Copies of any/all CRs related to ANS Siren failures and/or corrective maintenance during the 1 quarter.
- c) Copies of any/all CRs related to DEP opportunity failures during the 1 quarter.
- d) Copies of any/all CRs related to ERO qualification issues/deficiencies during the 1 quarter.

If there are any challenges or questions related to providing the requested materials, please contact the lead inspector (Ryan Alexander, phone: 817-200-1195), at the station's earliest convenience.

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