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To: [Dibbern, Zachary](#); jdenoch@stpegs.com
Cc: [Rollins, Jesse](#)
Subject: Request for Information: South Texas Project EP Exercise Inspection - July 2021
Date: Wednesday, May 5, 2021 10:27:38 AM
Attachments: [RFI for STP EP Exercise Insp Jul 2021.pdf](#)

Mr. Dibbern/Mr. Enoch:

As discussed during the inspection planning/kick-off call held last week (4/29/2021), attached is the **Request for Information (RFI) in support of the South Texas Project (STP) EP Exercise Inspection which will be conducted the week of July 26, 2021, with some in-office review of the draft exercise scenario to be conducted in May-June 2021.**

Additionally as discussed in last week's call, the biennial EP Exercise inspection for STP will include the use of Inspection Procedures (IP) 71114.01, 71114.04, 71114.08, and 71151, and will primarily focus on assessment of the station's conduct and critique of the biennial emergency preparedness exercise.

Details of the requested materials are included in the attachment to this e-mail. Some of the 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.

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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Thank you,

Ryan D. Alexander

Sr. Emergency Preparedness Inspector

NRC Region IV, Div. of Reactor Safety

1600 E. Lamar Blvd, Arlington, TX 76011

Office: 817-200-1195 *(forwarded to mobile during COVID-19 PHE)*

 **Please consider the environment before printing this e-mail.**

Request for Information for EP Performance Indicator Verification Inspection

Dockets 05000498, 05000499 (South Texas Project)

*Inspection Procedures: 71114.08 (documented in Inspection Report 2021002);
71114.01, 71114.04, and 71151 (documented in Inspection Report 2021003)*

Draft Scenario In-Office Review: May 29 – June 28, 2021

Onsite/Inspection Week: July 26 – 30, 2021

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

- a) Per 10 CFR 50, Appendix E, the licensee is required to submit the draft exercise scenario package to the NRC no later than 05/29/2021, 60-days prior to the 07/28/2021 exercise date. The inspectors will conduct a review of the scenario over the following ~4 weeks in accordance with IP 71114.08. The Lead Inspector is coordinating directly with STP Licensing/EP Staff to securely receive the draft submittal (if formally submitted in hard copy) to support inspectors' review.

The Lead Inspector will schedule a teleconference to communicate the inspectors' comments and observations associated with the review of the scenario no later than 30 days prior to the exercise (6/28/2021). The Lead Inspector is targeting the teleconference to be conducted the prior week on June 23 or 24, 2021.

- b) Consistent with the new NRC Temporary Staff Guidance ([NSIR/TSG 2020-02, "Temporary Staff Guidance – Additional Guidance for EP Inspections During the PHE"](#)), the NRC inspectors are expected to obtain and review Extent of Play agreements for both the onsite and ORO performance prior to the conduct of the exercise, depending on the applicable regulatory requirements the licensee chooses to demonstrate (e.g., 10 CFR Part 50, Appendix E, Section IV.F.2.b and/or 2.c). Specific guidance in Section 3.9 and Attachments 1 and 2 of the TSG describe the bases and scope of the review. **As such, please provide a copy of all Extent of Play agreement(s) associated with the July 28, 2021 plume phase exercise once available.**

2) IP 71114.01: Exercise Evaluation

Items 2.a – 2.c are requested to be provided prior to the onsite exercise inspection (no later than COB on 07/09/2021) via the electronic portal of the station's choosing. If some of these materials are not readily available for electronic transmission, please inform the lead inspector as to which document(s) are not available electronically and instead provide those documents in hard copy for review starting on the first day of inspection:

- a) Copies of all Drill and Exercise reports since the last biennial EP Exercise in CY2018, including standalone drills, team drills, dress-rehearsals, etc.
- b) In addition, a copy of the 2016 and 2018 Biennial EP Exercise Reports (if not provided as part of Item 2.b).
- c) Listing of all EP-related Corrective Action Documents/CRs generated since the last biennial EP Exercise in CY2018, in a sortable/searchable format. (Specific full CR

documents may be subsequently requested based on sampling and review by the inspectors.)

Items 2.d – 2.f are requested to be provided at various points during the onsite inspection week as noted below:

- d) First day of Onsite Inspection (07/26/2021) – Please provide hard/paper copies of the final, full Exercise Manual, one copy per inspector (4 total).
- e) First day of Inspection (07/26/2021) – Provide a single hard copy document of the current South Texas Project 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.
- f) No later than 8:00 AM on Thursday, 07/29/2021 (morning after the exercise) – Provide copies of all documents generated by participants (players, controllers, and evaluators) in the conduct of the exercise on 07/28/2021, separated by Emergency Response Facility (preferred).

3) IP 71114.04: EAL and Emergency Plan Changes

Items 3.a – 3.c are requested to be provided approximately two weeks prior to the onsite inspection (07/09/2021) via the electronic portal of the station's choosing:

- a) Copy of the 50.54(q) procedure (current revision)
- b) Listing of all of 50.54(q) screens performed since October 2020.
- c) Copy of all 50.54(q) evaluations completed since October 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).

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

- a) Please provide the applicable EP-related Performance Indicator data for:
4th Quarter 2020 through 2nd Quarter 2021 (3 quarters)

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 STP used to report the EP 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 3 quarters.
- Station procedure(s) for EP Performance Indicator data collection and submission.
- List of the DEP opportunities used in developing the PI values for the 3 quarters.
- All supporting documentation used to assess the DEP opportunities in the 3 quarters, 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) and qualification records for the key ERO members who were included in the ERO Participation data for the 3 quarters.
- If not included in the supporting documentation for DEP opportunities (5th bullet above), drill/exercise attendance records and any other supporting documentation used to develop the reported ERO participation PI data for 3 quarters.

Items 4.b – 4.d are requested to be provided approximately two weeks prior to the onsite inspection (07/09/2021) via the electronic portal of the station's choosing:

- b) Listing of all CRs related to ANS Siren failures and/or corrective maintenance during the 3 quarters, in a sortable/searchable format.
- c) Listing of all CRs related to DEP opportunity failures during the 3 quarters, in a sortable/searchable format.
- d) Listing of all CRs related to ERO qualification issues/deficiencies during the 3 quarters, in a sortable/searchable format.

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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