

From: [Hedger, Sean](#)
To: "Allen, Patrick"
Cc: [Barnette, James](#)
Subject: RFI for Comanche Peak Nuclear Power Plant EP Exercise Inspection (July 2022)
Date: Friday, May 13, 2022 8:48:00 AM
Attachments: [CP EP Exercise Inspection RFI 2022.pdf](#)

Mr. Allen, Mr. Barnette:

This e-mail serves to transmit a request for information to support and prepare for the Emergency Preparedness (EP) Exercise inspection at Comanche Peak Nuclear Power Plant, scheduled to occur the week of July 25, 2022.

By design, the biennial EP Exercise inspection includes the use of Inspection Procedures (IP) 71114.01, 71114.04, 71114.08, and 71151, to assess the overall health and maintenance of the station's EP program during the inspection year when the biennial EP Program inspection is not conducted. Details of the requested materials are included in the attachment to this e-mail. As noted in the attached, due to the ongoing Public Health Emergency, if possible, please make the requested materials available to me in electronic format using the online document portal of the station's choice, by the dates stated within the attachment. If you are unable to complete the request by this date, please contact me at the phone number listed below to discuss alternative options.

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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Sean Hedger
Senior Emergency Preparedness Inspector
NRC, Region IV
817-200-1556

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

*Dockets 05000445, 05000446 (Comanche Peak Nuclear Power Plant) Inspection Reports
2022002, 2022003*

Inspection Procedures 71114.08, 71114.01, 71114.04, and 71151

Draft Scenario In-Office Review: May 27 – June 27, 2022

Onsite/Inspection Week: July 25 - 29, 2022

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) The licensee will be submitting the draft exercise scenario package to the NRC, with the 60-day submission due date of 05/27/2022. The inspectors will conduct a review of the scenario over the coming weeks in accordance with IP 71114.08.

The NRC 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. A teleconference providing comments should be scheduled on or before June 27, 2022.

- 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 agreements associated with the July 27, 2022 plume phase exercise once they are available.**

2) IP 71114.01: Exercise Evaluation

- a) First day of Onsite Inspection (07/25/2022) – Please provide hard/paper copies of the final, full Exercise Manual, one copy per inspector (5 total).
- b) First day of Inspection (07/25/2022) – Provide a single hard copy document of the current site 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 8:00 AM on Thursday, 07/28/2022 (morning after the exercise) – Provide copies of all documents generated by participants (players, controllers, and evaluators) in the conduct of the exercise on 07/27/2022, separated by Emergency Response Facility (preferred).

Items 2.d – 2.f 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):

- d) Copies of all Drill and Exercise reports since CY2020, including standalone drills, team drills, dress-rehearsals, etc.
- e) In addition, a copy of the 2017 and 2019 Biennial EP Exercise Reports (if not provided as part of Item 2.d).
- f) Listing of all EP-related Corrective Action Documents/CRs generated since CY2020, 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.c are requested to be provided approximately two weeks prior to the onsite inspection (07/11/2022) 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) reviews and 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:
2nd Quarter 2021 through 2nd Quarter 2022 (5 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 Comanche Peak Nuclear Power Plant 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 5 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 5 quarters.

- All supporting documentation used to assess the DEP opportunities in the 5 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) for the key ERO members who were included in the ERO Participation data for the 5 quarters.
- Qualification records for the key ERO members who were included in the ERO Participation data for the 5 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 5 quarters.

Items 4.b – 4.d are requested to be provided approximately two weeks prior to the onsite inspection (07/11/2022) 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 5 quarters, in a sortable/searchable format.
- c) Listing of all CRs related to DEP opportunity failures during the 5 quarters, in a sortable/searchable format.
- d) Listing of all CRs related to ERO qualification issues/deficiencies during the 5 quarters, in a sortable/searchable format.

If there are any challenges or questions related to providing the requested materials, please contact the lead inspector (Sean Hedger, phone: 817-200-1556), at the station's earliest convenience.

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