

From: [Sean Hedger](#)
To: [Nee, Matthew J.](#)
Cc: [Kirkpatrick, Brenda M.](#)
Subject: RFI for Cooper Nuclear Station EP Exercise Inspection (May 2024)
Date: Thursday, February 22, 2024 2:20:00 PM
Attachments: [RFI for Cooper Nuclear Station EP Exercise Insp May 2024.pdf](#)

Mr. Nee, Ms. Kirkpatrick:

This e-mail serves to transmit a request for information to support and prepare for the Emergency Preparedness (EP) Exercise inspection at Cooper Nuclear Station, scheduled to occur the week of May 20, 2024.

By design, the biennial EP Exercise inspection includes the use of Inspection Procedures (IP) 71114.01/.07, 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, 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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**Request for Information for EP Exercise and Performance Indicator Verification
Inspection**

*Docket 05000298 (Cooper Nuclear Station) Inspection Report 2024002
Inspection Procedures 71114.04, 71114.07, 71114.08, and 71151
Draft Scenario In-Office Review: March 21 – April 26, 2024
Onsite/Inspection Week: May 20 - 24, 2024*

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 03/22/2024. 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 plan is being developed to conduct a teleconference providing comments the week of April 15, 2024.

- b) Provide a copy of all Extent of Play agreements associated with the May 21, 2024, plume phase exercise once they are available.

2) IP 71114.07: Exercise Evaluation – Hostile Action (HA) Event

- a) First day of Onsite Inspection (5/20/2024) – Please provide hard/paper copies of the final, full Exercise Manual, one copy per inspector (5), and one for each observer (1) (6 total).
- b) First day of Onsite Inspection (5/20/2024) – 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 Wednesday, 5/22/2024 (morning after the exercise) – Provide copies of all documents generated by participants (players, controllers, and evaluators) in the conduct of the exercise on 5/21/2024, separated by Emergency Response Facility (preferred).

Items 2.d-2.f are requested to be provided approximately two weeks prior to the onsite inspection (5/6/2024) via the electronic portal of the station's choosing:

- d) Listing of all EP-related Corrective Action Documents/CRs generated since CY2022, in a sortable/searchable format. (Specific full CR documents may be subsequently requested based on sampling and review by the inspectors.)
- e) A copy of the 2014 Biennial EP Exercise Report associated with a HA based event
- f) Copies of drill and exercise reports associated with HA based events following the exercise described in 2.e above, from 2014 to present

Items 2.g – 2.h 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):

- g) Copies of all Drill and Exercise reports since CY2022, including standalone drills, team drills, dress-rehearsals, etc.
- h) In addition, a copy of the 2021 and 2022 Biennial EP Exercise Reports (if not provided as part of Item 2.d).

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 (5/6/2024) 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 May 2023.
- c) Copy of all 50.54(q) evaluations completed since May 2023.

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

- a) Please provide the applicable EP-related Performance Indicator data for:
2nd Quarter 2023 through 1st Quarter 2024 (4 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 Cooper Nuclear Station 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 4 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 4 quarters.
- All supporting documentation used to assess the DEP opportunities in the 4 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 4 quarters.

- Qualification records for the key ERO members who were included in the ERO Participation date for the 4 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 4 quarters.

Items 4.b – 4.d are requested to be provided approximately two weeks prior to the onsite inspection (5/6/2024) 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 4 quarters, in a sortable/searchable format.
- c) Listing of all CRs related to DEP opportunity failures during the 4 quarters, in a sortable/searchable format.
- d) Listing of all CRs related to ERO qualification issues/deficiencies during the 4 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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