

INSPECTION PROCEDURE 71114 ATTACHMENT 1

EXERCISE EVALUATION

Effective Date: July 1, 2026

PROGRAM APPLICABILITY: IMC 2515 A

CORNERSTONE: Emergency Preparedness

INSPECTION BASES: IMC 0308

SAMPLE REQUIREMENTS:

Sample Requirements		Minimum Baseline Completion Sample Requirements		Budgeted Range	
Sample Type	Section	Frequency	Sample Size	Samples	Hours
Exercise Evaluation	02.01-02.06	Biennial	1	1	80-85 hours

71114.01-01 INSPECTION OBJECTIVE

To evaluate the adequacy of the licensee’s conduct of the biennial exercise and its capability to assess performance via a formal critique process in order to identify and correct weaknesses associated with planning standard 10 CFR 50.47(b)(14).

Note: If the exercise is being observed or audited by Institute of Nuclear Power Operations (INPO) refer to the emergency preparedness appendix of the memorandum of agreement between INPO and the U.S. Nuclear Regulatory Commission (NRC) (ADAMS ML13129A093) for exercise evaluation interface expectations.

71114.01-02 INSPECTION REQUIREMENTS

NOTE: This inspection is to be implemented in parallel with the guidance of IP 71114 as applicable.

02.01 Perform independent observation of licensee performance of the biennial exercise including any post-exercise critique activities

02.02 Review the corrective action program (CAP) for drill and exercise weaknesses and deficiencies.

- 02.03 Determine whether the exercise performance demonstrated that reasonable assurance exists that the licensee can effectively implement its Emergency Plan to adequately protect the public health and safety in the event of a radiological emergency
- 02.04 Evaluate coordination with incident command post (ICP) for hostile action-based exercises.
- 02.05 Represent the NRC at the Federal Emergency Management Agency (FEMA) public meeting, as negotiated. *Physical representation is not required.*
- 02.06 *Review the proposed offsite exercise deficiencies provided by FEMA and ensure the licensee is aware of those deficiencies [C1].*

71114.01-03 INSPECTION GUIDANCE

The focus of this inspection is to evaluate the adequacy of the licensee's conduct of the biennial exercise and its ability to assess performance via a formal critique process to identify and correct weaknesses, *as well as the adequacy of learning from any issues identified during the previous evaluated exercise (onsite or offsite).* Emphasis should be placed on licensee assessment of classification, notification, PAR development and dose assessment activities, *as well as emergency response facility performance and emergency response organization (ERO) staff performance,* but inspectors should *also* evaluate as many other aspects of performance and the associated critique as resources allow.

In preparing for this inspection, the lead inspector should consider the following:

- a. Develop a plan to deploy inspection resources in a manner to observe classification, notification, PAR development and dose assessment activities *as well as any significant scenario-driven activities.* A review of DEP PI data for failures and/or adverse trends will help inform what specific areas should be observed. If the DEP data review does not indicate any significant failures or trends, a sampling of RSPS activities should be sufficient and inspection resources may then be allocated to observe other supporting program functions.

Include in the inspection plan for sites with co-located licensees, verification of the conduct, observation and, as appropriate, licensee critique of activities required by 10 CFR 50 Appendix E §IV.F.2.b, and IV.F.2.c to maintain interface with the affected State and local authorities and licensee.

- b. NRC inspectors do not evaluate offsite agency performance but will rather focus on the interface of licensee personnel with offsite agencies. However, any observed offsite performance weaknesses that impact the licensee's ability to implement the onsite emergency plan (E-Plan) should be shared with the FEMA evaluation team for further assessment.
 - o *However, NRC inspectors are responsible for determining if the licensee complied with applicable regulatory requirements for the performance of the exercise (e.g., App E.IV.F.2.c).*
- c. Review the E-Plan and Emergency Plan Implementing Procedures (EPIPs) that provide instructions for classification, notification, PAR development and dose assessment

activities, and other functional areas relevant to the exercise. Develop an understanding of the criteria for timely and accurate completion of these activities based on EIPs, the scenario, and NEI 99-02, "Regulatory Assessment Performance Indicator Guideline." Ensure that the E-Plan and EIPs contain criteria concerning protective actions for non-essential onsite personnel, including evacuation for Site Area Emergencies and General Emergencies. [C2]

- d. Familiarize yourself with the licensee's critique process and discuss expectations with the licensee. This familiarization should include the critique scheduling, content, and participation, as well as the inspector's need to know when the critique process is complete. The NRC considers the critique process complete when all draft conclusions related to the identified weaknesses have been presented to licensee senior management, and any management questions or comments have been documented. The licensee should understand that the critique should not be delayed in order to address every minor problem identified.

Schedule a briefing of the inspection team by licensee personnel before the exercise to discuss exercise content/conduct and any late scenario revisions. This is an opportunity to ask questions regarding the scenario, licensee expectations for judging timely and accurate DEP PI opportunities, logistics, mentor arrangements, shift changes, *etc.*

03.01 Perform independent observation of licensee performance of the biennial exercise including any post-exercise critique activities.

- a. Observe licensee performance in classification, notification, PAR development, dose assessment activities and the other areas selected.

Note: The licensee has demonstrated the capability to make a notification in 15 minutes if offsite response organizations identified in the E-plan receive notification of, at a minimum, the declared emergency classification level within 15 minutes of declaration. The licensee's critique should identify any delay occurred in making a notification to one or more offsite response organization (ORO) (e.g., an ORO cannot be reached). Any notification delay that was under the control of the licensee to foresee and prevent (e.g., telephone call lists not kept up to date) should be evaluated as a failure to comply and assessed for significance.

- 1. Identify any apparent performance weaknesses.
 - 2. **Review** copies of completed forms and checklists that document classification, notification and PAR development activities and the other areas selected for inspection.
 - 3. Maintain inspector-identified weaknesses confidential until after the formal licensee critique. Ensure that the licensee critique conclusions are complete, including management review, before discussing inspector observations and conclusions **with the licensee.**
- b. Identify **any** occurrences of the prompting of exercise players that prevented the identification and correction of ERO performance weaknesses. **Inappropriate action between an exercise player and controller could mask a deficiency which could result in the licensee failing to identify a weakness and** may be a performance deficiency that

should be evaluated as a failure to comply and assessed for significance. Prompting may also be a basis for failing a DEP PI opportunity.

- c. Evaluate the readiness of the emergency response facilities and equipment, including alternate and backup facilities to the extent feasible during the exercise.
- d. Evaluate the operational support center (OSC), technical support center (TSC), **Joint Information Center/Joint Information System (JIC/JIS)**, and emergency operations facility (EOF) capability to staff, activate and perform assigned tasks during the exercise. The activation times for these facilities should be noted and evaluated against E-Plan commitments.

Determine the licensee's commitments **for assessing** emergency response activation timeliness (e.g., when the "clock starts" and the "clock stops"). **The NRC expects that the clock will start** with the declaration of an emergency classification level and ends when the facility **or position** is ready to assume its assigned functions under the E-Plan, relieve the on-shift staff of those **EP functions**, **and augment the site response to the event**. Although the facility may be ready, the on-shift staff relief may be postponed in the interest of completing critical tasks prior to turnover.

- e. Evaluate the capabilities of the primary (alternate and backup, as applicable) EOF against the requirements of 10 CFR Part 50 Appendix E §IV.E.8.c and the guidance in NSIR-DPR-ISG-01 §IV.I, "EOF—Performance-Based Approach"; **specifically** the capability to:
 - 1. Analyze plant technical information.
 - 2. Provide technical briefings on event conditions.
 - 3. Provide technical briefings on event conditions and prognosis to other licensee ERO locations and offsite response organizations for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves.
 - 4. Obtain and display plant data and radiological information for each reactor at a nuclear power reactor site and for each nuclear power reactor site that the facility serves.
 - 5. Support response to events occurring simultaneously at more than one nuclear power reactor site if the emergency operations facility serves more than one site.
- f. **Conduct a meeting with the NRC inspection team following the exercise and initial emergency response facility critiques to capture team observations and any weaknesses noted by the inspectors at their facilities.**
 - 1. **Inspector observation of post-exercise critiques and debriefs are encouraged unless the licensee specifically asks the NRC not to observe.**
 - 2. **Inspectors may not discuss any NRC observed issues but may provide observations from the exercise for licensee consideration for areas where they may benefit from the overall benefit of the inspectors' exposure to multiple methods licensees have responded to a given exercise scenario, see OEDO Procedure-0235, "Driving Regulatory Decisions Through More Effective Communications," (ML25167A039).**

Coordinate these observations with the inspection team leader to ensure consistency of messaging.

- g. Evaluate the licensee's conduct of the critique process.
 - 1. Determine accuracy of the licensee's input for the Drill and Exercise Performance Indicator for the classification, notification, and PAR development activities associated with this exercise. The licensee's assessment of performance should be done in accordance with the applicable criteria of NEI 99-02. Any discrepancies should be discussed with licensee management and documented as appropriate.
 - 2. Observe player self-assessments in each emergency response facility as well as the licensee overall critique discussion, and any other post-exercise critique or debrief as appropriate, to ensure all potential weaknesses are appropriately captured and assessed.
 - 3. Do not share any NRC exercise observations of potential weaknesses or deficiencies until the licensee has completed their full critique process, including any required management approval, even if the NRC observations are consistent with the licensee's preliminary critique.
 - 4. Evaluate any inspector-identified weaknesses not captured by the licensee. Verify the facts of the weakness to ensure there is no misunderstanding of exercise participant actions, including those actions performed at a facility not observed by the inspector who identified the weakness. If the inspector identifies the weakness has not been properly assessed by the licensee, there is a potential issue with the critique which should be further evaluated as a performance deficiency. This can be discussed with the licensee only when the formal critique process is complete.

03.02 Review the corrective action program (CAP) for drill and exercise weaknesses and deficiencies.

- a. Review previously identified weaknesses and corrective actions from licensee drill/exercise reports, quality assurance audits, and NRC exercise inspection reports since the last biennial exercise and be aware of the licensee's DEP value. This action does not replace the review of corrective actions performed under IP 71114.05 but is to identify those weaknesses and corrective actions that can best be evaluated in the context of an emergency exercise as opposed to a program inspection, such as emergency response organization (ERO) performance weaknesses.
- b. Identify any recurring weaknesses since the last inspection and note if any were present in the exercise observed for this inspection. If so, determine if the recurrence is the result of ineffective corrective actions.
 - 1. Determine if the licensee identified the trend or repeat weakness and entered it into the CAP.

Perform a detailed review of any failure to correct a drill or exercise weakness, including a detailed review of the weakness and the effectiveness of associated corrective actions, based on the complete history of the issue. The intent of this assessment is to see if there is a pattern of recurring performance problems in similar activities in order to identify ineffective corrective actions. A single repeat of a

weakness should not automatically be deemed a failure of the CAP. Conversely, a single success in a drill or exercise (e.g., by one well-drilled team) should not necessarily be considered a demonstration of problem resolution. When a previously identified weakness recurs in a subsequent drill or exercise, the inspector should perform an assessment of the effectiveness of the prior corrective actions based on a complete history of the issue, the inspector should:

- (a) Review specific corrective actions identified for the previous weaknesses, as well as similar occurrences in response to actual events, drills, exercises and training evolutions.
- (b) Consider the status of the DEP PI as well as the status of the relevant RSPS components of the DEP PI.
- (c) Review corrective action, self-assessment, and inspection records for an entire inspection cycle with emphasis on similar performance deficiencies.
- (d) Verify completion of associated corrective actions.

03.03 Determine whether the exercise performance demonstrated that reasonable assurance exists that the licensee can effectively implement its Emergency Plan to adequately protect the public health and safety in the event of a radiological emergency.

- a. Determine whether the exercise as planned and executed was sufficient to test the implementation of the licensee's emergency plan.
- b. If this exercise did not adequately demonstrate implementation of the emergency plan or if it cannot be determined if the exercise was sufficient, evaluate whether a remedial exercise is required by Section IV.F.2.f of Appendix E to 10 CFR 50. Inspectors should discuss the possibility of a remedial exercise with NRC regional and Office of the Chief Nuclear Reactor Inspector, Division of Oversight and Compliance Programs, Reactor Inspection Branch (CNRI/DOCP/RIB) management prior to any discussions with the licensee. A remedial exercise may be requested where:
 - 1. Confidentiality is compromised to the extent that the exercise no longer affords the opportunity for the licensee to assess ERO performance of key skills and to identify necessary corrective actions. For example, the re-use of a scenario, a large portion of which was recently used (e.g., in a practice exercise for the graded exercise) the same scenario for the same ERO members. Since each situation needs to be considered on a case-by-case basis, the inspector should gather information that describes the scope of the breach and the number ERO members and their positions.
 - 2. The scenario does not provide the opportunity for demonstration of key skills.
 - 3. The scenario is not implemented in such a way that provides the opportunity for demonstration of key skills, or
 - 4. ERO performance does not provide the NRC with a basis to determine that key skills have been maintained.

Note that 'skill-of-the-craft' is not necessarily the focus of what is evaluated during the evaluated exercise. While performance issues will be noted, it is expected that ERO staff who are basically doing what they would be doing normally, i.e., an electrician is doing electrical work, etc., are trained to do so outside of the EP (ERO) program. Typically, this is limited to maintenance staff, radiation protection staff, and chemistry staff doing required sampling.

Note: Occasionally circumstances may cause licensees to separate the onsite and offsite portions of the evaluated exercise, leading to asynchronous review by NRC and FEMA. This can result in the inspectors needing to take additional actions to verify compliance with Appendix E requirements. The NRC determines whether a licensee is in compliance with Appendix E, Section IV.F.2.c. FEMA's role is to determine whether an exercise demonstrates that there is reasonable assurance that the ORO plans can be implemented and provide input for the NRC's overall determination of reasonable assurance per the NRC/FEMA Memorandum of Understanding (ML15344A371).

For Appendix E, Section IV.F.2.b compliance, the EP inspector should ensure that the expected coordination and communication with ORO responders is maintained with either phone cells, or with actual (potentially limited) participation from the OROs such that all the required functional areas of emergency response are demonstrated per Appendix E, Section IV.F.2.b per the scenario. This may entail the use of licensee staff acting as ORO phone cells, or limited participation by ORO staff to receive the EAL and/or protective action recommendation (PAR) notifications. It is not necessary to evaluate how OROs use the notifications; it is only necessary to evaluate the licensee's determination of the EAL (or PAR), the completion of the Notification Form, and the communication of the EAL (or PAR) to the OROs (simulated with a licensee phone cell, or to the OROs as determined by the extent-of-play). The extent-of-play for the exercise should be known in advance of the exercise to allow for the EP inspector to adequately prepare for how the licensee intends to demonstrate the communication with OROs during the exercise.

For Appendix E, Section IV.F.2.c compliance, the EP inspector should review the extent-of-play agreement that will document and define the approach for demonstrating and evaluating the FEMA REPP Manual capability targets. This is intended to define the commitment of participants in advance and should outline those commitments, as well as the facilities to be evaluated or utilized and the anticipated level of participation. Capability Targets are performance thresholds for each core capability, or distinct critical element necessary to achieve the National Preparedness Goal. REP Program-specific capability targets are derived from the planning standards of 44 CFR Part 350, support evaluation criteria from NUREG-0654/FEMA-REP-1, Revision 2, and are used as the baseline by FEMA for assessing ORO preparedness in terms of core capabilities using the FEMA REPP Manual. Each capability target has a section titled, "Demonstration and Evaluation Guidance." The guidance in these sections of the FEMA REPP Manual is intended for use by FEMA evaluators when preparing for a demonstration. Information in these sections includes critical tasks and key points of review requiring observation and assessment by evaluators. While the NRC does not use the term "capability target" in the evaluation of exercises, FEMA and OROs commonly use this terminology. NRC inspectors need to be aware of the differences in terminology between FEMA/OROs and

NRC/licensees. See the guidance in IP 71114.08, Exercise Evaluation - Scenario Review, for additional information.

03.04 Evaluate coordination with incident command post (ICP) for hostile action-based exercises.

Note: A hostile action-based exercise still has the primary focus of evaluating the adequacy of the licensee's ability to conduct an exercise that demonstrates classification, notification, PAR development, dose assessment activities, and the ability to adequately protect employees and emergency workers. In addition, this type of exercise is used to assess licensee coordination with offsite officials at the ICP and the ability of the organization to perform under hostile action conditions which may restrict movement of operators. This will be scenario driven in that the scenario may not require dose assessments or PARs.

Due to the significant amount of resources needed to respond to hostile action, some actions may be simulated through tabletop exercises or demonstrated out of sequence. The inspector should verify the licensee's plans during performance of IP 71114.08, "Exercise Evaluation – Scenario Review," to ensure the exercise will adequately demonstrate that reasonable assurance exists that the licensee can effectively implement its emergency plan.

When staffing the exercise inspection team, consider including inspectors with security training to ensure a comprehensive review of licensee exercise performance.

Pre-staging, and pre-setup, may be acceptable, particularly if the OROs plan to do so, for the ICP, remote EOFs or remote JIC/JIS, and for the alternate facility. If this is desired, then it should be managed and controlled via the Exercise Drill Book reviewed by the NRC and FEMA.

- a. Perform an evaluation of the licensee's planned range of protective actions to protect onsite personnel during hostile action and the procedures for onsite protective action decision making. The review should include the following elements:
 1. Review onsite protective actions to ensure there is a clear distinction between actions taken for a credible threat versus active hostile action.
 2. Review licensee decision-making tools available to aid the shift manager in rapidly determining the optimum protective action for onsite personnel during a hostile action
 3. Verify the range of protective actions include provisions for the following:
 - (a) Evacuation of onsite personnel from target buildings
 - (b) Ability to perform site evacuation while maintaining defense of site entrance/exit points
 - (c) Dispersal of licensed operators
 - (d) Ability to shelter personnel in structures away from potential site targets
 - (e) Arrangements for accounting for personnel after the attack

- (f) Availability of specific equipment, materials, buildings or areas to support the expected usage under threat conditions
- (g) Access to shelter structures are always readily available
- b. Observe licensee performance in classification, notification, PAR development, dose assessment activities, prompt dispatch of liaisons to the incident command post (ICP) knowledgeable in plant operations, radiation protection, and plant security.
- c. Observe the following as resources permit:
 1. Demonstration of the capabilities of site security to interface with the EOF, OSC, TSC, and control room.
 2. Support of and interface with an ICP to facilitate the transfer of plant information and coordination of response activities.
 3. The use of the alternative emergency response facilities for activation of the ERO.
 4. Actions taken to shelter personnel.
 5. Conduct of operations and repair activities during site conditions that prevent normal access due to fire, locked doors or security measures.
 6. Rescue of and medical attention for significant numbers of personnel.
 7. Prioritization of efforts to protect plant equipment or to secure access to plant areas for repairs.
 8. Response coordination and site access established between on-shift personnel and ORO first responders.
 9. Coordination and decision-making actions necessary for prompt mobilization or relocation of the ERO in a hostile event environment.
 10. Protecting a minimum contingent of operations and maintenance personnel for recovery.

03.05 Represent the NRC at the Federal Emergency Management Agency (FEMA) public meeting, as negotiated.

Note: For licensee locations that have multiple FEMA regions involved in the exercise evaluation, the inspector will need to determine which FEMA Public Meeting(s) can be attended based on inspection resources, schedules, etc. In either case, the inspector shall be aware of any significant issues or concerns related to the licensee-ORO coordination regardless of the issues rising to FEMA Level 1 or 2 finding.

- a. The lead inspector, or alternate, should represent the NRC at the FEMA public meeting. A statement should be made as to the adequacy of exercise conduct from the NRC perspective. Potential findings against the licensee's program (i.e., against the exercise critique) as a result of the inspection should not be announced at the public meeting.
 1. For a successful demonstration a statement such as:

“The preliminary observation of the inspection team is that conduct of the exercise was adequate to demonstrate the licensee’s compliance with the EP Cornerstone Performance Expectation and demonstrates reasonable assurance exists of the licensee’s ability to effectively implement its emergency plan to adequately protect the public health and safety in the event of a radiological emergency.”

2. For an unsuccessful demonstration, or for one that a determination has yet to be made (i.e. prior to the exercise, the NRC was made aware of change(s) made to the licensee’s emergency plan that the NRC has not had the opportunity to review) a statement such as:

“The NRC inspection team was **unable** to conclude its review of the exercise at this time. The NRC will continue to review the available information before issuing an official inspection report.”

03.06 Review the proposed offsite exercise deficiencies provided by FEMA and ensure the licensee is aware of those deficiencies. [C1]

- a. The inspector shall coordinate with the applicable FEMA site specialist or Lead Inspector and be made aware of any potential issues, or of any remedial activities already performed. When available the inspector shall review the FEMA AAR and identify any issues requiring follow-up with the licensee. This requirement is not intended to delay issuance of the NRC inspection report, especially if the inspector received notice from the FEMA site specialist that there were no potential issues that could affect the ability of the licensee to respond to an event.
- b. Upon receipt of the letter providing official notification of offsite exercise deficiencies, review the proposed deficiencies and their bases for understanding. FEMA review and findings are entitled to a presumption of adequacy and are to be taken at face value. If the basis for any deficiency is not clear or if the reviewer is aware of information to the contrary, obtain clarification from NRC Headquarters staff, Regional State Liaison Officers (RSLOs), or regional FEMA staff.
- c. NRC Headquarters staff will be responsible for coordinating the response to these FEMA identified deficiencies, up to and including informing the licensee, the Commission (CA Note) and appropriate regional and HQ staff.

71114.01-04 REFERENCES

Information Notice 85–80, “Timely Declaration of an Emergency Class, Implementation of an Emergency Plan, and Emergency Notifications”

EPPOS-2, “Emergency Preparedness Position (EPPOS) on Timeliness of Classification of Emergency Conditions”

NEI-99-02, “Regulatory Assessment Performance Indicator Guideline”

NSIR/DPR-ISG-01, “Interim Staff Guidance Emergency Planning for Nuclear Power Plants”

Memorandum of Agreement Between the Institute of Nuclear Power Operations and the U.S. Nuclear Regulatory Commission dated September 11, 2013 (ML13129A093)

OEDO Procedure-0235, "Driving Regulatory Decisions Through More Effective Communications," (ML25167A039)

Memorandum of Agreement Between the Federal Emergency Management Agency and the U.S. Nuclear Regulatory Commission

END

Attachment 1: Best Practices for Exercise Inspections

NRC Resident Inspectors (RIs)

The RIs should inform the licensee if they will be participating in the evaluated exercise as a responder, i.e., they will respond as if it was an actual event; in effect they will be part of the ERO. If they will be participating as part of the ERO, they should participate in any ERO pre-exercise briefings, and in the post-exercise facility critique (for whichever ERF they are in when the exercise is terminated). As part of the ERO, they should adhere to whatever simulated security situation may exist for the scenario. At the conclusion of the facility critique, the RIs may return to their normal RI duties.

General

In general, the NRC's oversight in emergency preparedness is focused on adherence to the emergency plan with an emphasis on the most risk-significant areas, and inspection resources should be deployed in a manner to cover these areas. However, within the constraint of resources, a broad range of response areas should be inspected specific to the scenario.

This attachment contains best practices to assist inspectors in observing licensee activities. It covers general inspection advice as well as information specific to each emergency response facility (ERF). While it is not mandatory for inspection completion, inspectors should use the information in this attachment to help their preparation and focus their efforts.

- Inspectors should maintain a good chronology of events for the facility they are observing, including when specific ERO minimum staff members arrive and when minimum staffing for the ERF is achieved.
- Use the information provided in the exercise timeline to try to directly observe important discussions between the ERO and observe the major decisions taken by facility managers. However, be cautious of 'hovering' around where these decisions will occur so as not to tip the ERO of an upcoming event or scenario action.
- Be cognizant of information on displays and status boards.
- Identify, to the extent practicable, whether the ERO is following their procedures.
- Inspectors should observe interactions between participants, exercise controllers, and observers. Note whether there appears to be any inappropriate leading or prompts from the controllers and that participants are only provided with earned information.
- Inspectors should be mindful of scenario materials, ensuring no information is left unattended or available to exercise participants. This applies to NRC controlled copies as well as controller and observer copies.
- Inspectors should not interact with participants during the exercise and should minimize interactions with controllers and observers. If you need to interact, please work through the Facility Lead Controller.

During inspection preparations, the lead inspector should review licensee drill and exercise condition reports for insights on resource prioritization and share these insights with the inspection team so they can plan their inspection focus.

ERF-Specific Guidance

Simulator Control Room

Control Room personnel are responsible for coordinating all emergency response activities until other emergency facilities are activated and relieve the crew of the responsibility for EP functions. Control Room personnel are responsible for diagnosing abnormal plant conditions, taking actions to mitigate the abnormal conditions, managing plant operations, and performing initial emergency response activities. When staffing the exercise inspection, consider inspectors qualified as license examiners or those who have past resident inspection experience as the person assigned to observe the control room, or ensure they are fully qualified EP inspectors per IMC 1245 C6. If they are not fully qualified EP inspectors, the regional branch chief shall document approval of the assignment with direction provided by the lead (fully EP qualified) inspector.

The following areas should be continuously assessed in determining if the key skills and functions of the Control Room have been maintained, as demonstrated during the exercise:

1. The appropriate on-shift minimum staff reports to the Control Room (or alternate locations) in accordance with the procedural goals.
2. Operators actively monitor key plant parameters and escalation criteria of EALs in accordance with station procedures.
3. The on-shift HP or RP Technician or Chem Technician completes the prompt dose assessment to support PAR development if necessary and if this function has not yet transferred to the TSC/EOF.
4. Event classification(s) and notification(s) are timely and accurate relative to the information available to the exercise participants.
5. Control room communications ensure participants are cognizant of the event progression.
 - a. Shift manager or control room supervisor briefings are timely and communicate station priorities and changing onsite hazards
 - b. Control room supervisor is actively working through abnormal and emergency procedures, providing direction to reactor operators and non-licensed operators as required, including transition to flex, EDGM and SAMG beyond design basis procedures.
6. The shift manager directs ERO activation in accordance with station procedures, ensuring timely activation as required by the emergency plan.
7. Non-licensed operator activities are appropriately coordinated following the activation of the OSC/TSC in accordance with station procedures. Some stations maintain control of the non-licensed operators through the control room while others release them to report to the OSC for assignment to in-plant repair and mitigation teams. The inspector should verify the expected approach prior to the exercise.

8. The control room may continually maintain an open ENS line at an Alert or higher, following receipt of certain security threats, or at NRC request until relieved by the TSC or EOF staff.
9. If conditions warrant, actions taken to invoke 10 CFR 50.54(x) and (y) are completed by a licensed SRO.
10. For HAB events, the details of the scenario may dictate alternative response actions than those discussed here. The inspector should ensure to understand the scope of the expected scenario and ensure that the evaluation team is set up accordingly.

Operations Support Center

The primary function of the OSC is to implement the repair and mitigation actions onsite in the plant as directed by TSC personnel. In accomplishing the repair and mitigation actions, OSC personnel will also generally be responsible for the health and safety of the onsite repair teams and other personnel. During an exercise, there will be some degree of simulation of plant activities since in-plant components cannot be manipulated and the inspector should confirm licensee plans ahead of time to understand the observation opportunities available at the OSC. This should also include a discussion of the use of personal protective equipment and decontamination practices and to what extent the OSC staff are expected to demonstrate these skills. Inspectors assigned to observe the OSC should expect to split their time between following dispatched repair teams and observing OSC activities, with as much time spent in the field with the teams as practical.

The following areas should be continuously assessed in determining if the key skills and functions of the OSC ERO members have been maintained, as demonstrated during the exercise:

1. The OSC is activated in a timely fashion with appropriate minimum staff in accordance with procedural goals.
2. Communications within the OSC and between the other ERFs ensure a common understanding of event progression, changing site conditions, and station priorities, reflecting updated information received from in-plant repair and mitigation teams.
3. In-plant repair and mitigation teams are appropriately briefed on tasks, procedures, and hazards (including both radiological and industrial) prior to their dispatch.
4. In-plant repair and mitigation teams obtain the appropriate PPE, communication equipment, tools, and materials to perform their task in accordance with the briefing and predetermined extent of play. It is not necessary to don protective equipment as long as the responders demonstrate where they obtain the PPE and how to do it. If the responder is required to be respirator qualified, then they should demonstrate where to obtain the respirator, or SCBA if applicable, and should have their respirator glasses. If they are not clean shaven, they must demonstrate how/when to do so.
5. In-plant repair and mitigation teams are dispatched to the correct location in the plant (or approved alternate locations, if pre-designated as part of the exercise playbook), remain in contact with the OSC, and have their progress tracked in completing the assigned tasks.

6. In-plant repair and mitigation teams report back assessment of plant conditions to corroborate indications from plant instrumentation, providing confirmatory evidence to the ERO decisionmakers, and they are appropriately monitored for radiological contamination.
7. OSC staff, in coordination with TSC RP manager, continually evaluate changing radiological conditions to ensure the habitability of the facility is maintained and consideration is given to relocation of the OSC personnel and issuance of KI to onsite emergency workers when appropriate and in accordance with procedures. This includes site security personnel who may be exposed to hazards while stationed at their security posts and any potential offsite responders like local law enforcement, fire fighters, and emergency medical services.
8. Note that the OSC Teams must demonstrate the “OSC Life-Cycle,” as follows:
 - a. The CR and TSC establish priorities
 - b. The TSC develops a plan for a prioritized activity
 - c. This plan is communicated to the OSC
 - d. The OSC prepares an OSC Team for this activity and briefs them on the task, including any radiological or environmental protections needed, and applicable direction
 - e. The OSC Team performs the task, or simulates it with enough demonstration/communication for the evaluator to determine adequate performance
 - f. The OSC Team returns to the OSC and is debriefed
 - g. The OSC provides this information back to the TSC.

Technical Support Center

The primary function of the TSC is to provide management and technical support to the station operations personnel during emergencies in order for the licensed operators to focus on plant operations and EOP implementation. The TSC will also provide augmented staff to support a wide range of postulated events. The TSC staff will typically perform all EP functions, until relieved by the applicable EOF staff. However, some licensees staff the EOF in parallel with the TSC so the inspector should be aware of the site’s approved emergency plan.

The following areas should be continuously assessed in determining if the key skills and functions of the TSC ERO members have been maintained, as demonstrated during the exercise:

1. The TSC is activated in a timely fashion with appropriate minimum staff in accordance with procedural goals.
2. Communications within the TSC and between the other ERFs ensure a common understanding of event progression, changing site conditions, and station priorities, reflecting updated information received from in-plant repair and mitigation teams.
3. TSC staff actively monitor key plant parameters and escalation criteria of EALs in accordance with station procedures. Refer to the emergency plan to understand ERF roles and responsibilities. Some stations transfer the emergency director’s function directly from the control room to the EOF while others transfer the function to the TSC. Whichever ERF does not declare EALs usually has a procedural requirement to support

the monitoring of plant parameters and/or act as a peer check for the ERF with decision-making responsibility.

4. If the TSC is responsible for classification and/or notification, event classification(s) and notification(s) are timely and accurate relative to the information available to the exercise participants.
5. TSC engineering staff evaluates core damage, mitigating systems health, and the availability of alternate mitigating strategies, factoring the information into the development of repair and mitigation priorities.
6. The TSC may continually maintain an open ENS line at the NRCs request unless relieved by the EOF staff.
7. Changing radiological conditions in and around the TSC are evaluated for habitability, with consideration given for relocation of TSC personnel in accordance with procedures.
8. TSC RP manager coordinates with OSC to ensure changing site radiological conditions are communicated to the rest of the ERO and other support organizations such as site security personnel who may be exposed to hazards while stationed at their security posts and any potential offsite responders like local law enforcement, fire fighters, and emergency medical services.
9. TSC RP Manager is responsible for the radiation protection of any field teams.
10. The TSC and OSC may report to the alternate facility for HAB events.

Emergency Operations Facility

The primary function of the EOF is to provide overall management and command and control of licensee resources in response to the plant emergency and recovery operations. Typically, responsibility for decision making regarding emergency classifications, development and communication of protective action recommendations (PARs) to offsite authorities, and further actions to request offsite assistance, including resources from the federal government, are ultimately transferred to the EOF, under the direction of the EOF Manager (Emergency Director). For some stations, the responsibility for emergency classifications may be retained by the Emergency Plant Manager/TSC Manager, while PAR development and overall command and control transfer to the Offsite Emergency Director in the EOF. Review the emergency plan for site specific details.

The following areas should be continuously assessed in determining if the key skills and functions of the EOF ERO members have been maintained, as demonstrated during the exercise:

1. The EOF is activated in a timely fashion with appropriate minimum staff in accordance with procedural goals.
2. EOF staff actively monitor key plant parameters and escalation criteria of EALs in accordance with station procedures. Refer to the emergency plan to understand ERF roles and responsibilities. Some stations transfer the emergency director's function directly from the control room to the EOF while others transfer the function to the TSC. Whichever ERF does not declare EALs usually has a procedural requirement to support

the monitoring of plant parameters and/or act as a peer check for the ERF with decision-making responsibility.

3. If the EOF is responsible for classification and/or notification, event classification(s) and notification(s) are timely and accurate relative to the information available to the exercise participants.
4. PARs are developed in accordance with the station's procedures, and the licensee uses appropriate criteria for escalating from a plant-based, default PAR (e.g., 2-to-5-mile downwind keyhole), to a dose assessment-based PAR.
5. EOF dose assessment personnel complete timely dose assessment updates based on new release information, changing meteorological conditions, and offsite field monitoring team data in accordance with procedures. The dose assessments include all reasonable release pathways based on the scenario.
6. The EOF may continually maintain an open ENS line at the NRCs request unless it is maintained by the TSC staff. Similarly, the EOF staff establishes and maintains open the HPN line with the NRC staff upon request.
7. If the EOF is within the EPZ, EOF staff evaluates changing radiological conditions for habitability, with consideration given for relocation of EOF personnel in accordance with procedures. Additionally, portal monitors and/or hand friskers are used, and decontamination protocols are established to monitor staff entering the EOF following a release in progress according to procedures.
8. EOF staff cooperate with any state or local emergency responders co-located at the facility to ensure they have information they need to make protective decisions for the public. FEMA evaluates state and local participant performance in an exercise, but NRC inspection can review licensee participant performance for those EOF members who support the offsite organizations.
9. Field monitoring teams, dispatched and controlled by EOF staff, are deployed efficiently and effectively to monitor conditions offsite. The members of the field monitoring teams are appropriately briefed and protected from changing hazards, and the data collected is promptly communicated to the rest of the ERO to inform decision-making. The applicable RP Manager is responsible for the radiation protection of field team personnel; either from the TSC or the EOF. The inspector should be aware of the site-specific details for this from the emergency plan and should evaluate compliance and effectiveness.
10. If the joint information center/joint information system (JIC) is in the same facility as the EOF, observe **press** briefings as time allows. At a minimum, observe EOF interactions with the JIC/JIS, and evaluate the news briefings, to determine if the JIC/JIS is effective and compliant with the emergency plan.

Attachment 2: Request for Information (RFI)

If not already in ADAMS, the request for information can include:

- List of all corrective actions/condition reports (just the title and scope, no details needed) related to drills and exercise performance issues (deficiencies or weaknesses) issued since the last inspection.
- Copy of the procedures related to the following:
 - Emergency response facilities (TSC, OSC, EOF, JIC/JIS, and if applicable the ICP and Alternate Facility),
 - This includes position checklists.
 - Classification (EALs) procedures, including EAL Wallboard (as applicable).
 - Notification procedures (OROs and NRC).
 - PAR procedures.
- Updated scenario and updated Controller/Evaluator manual/book:
 - This should include any agreed upon phone cells, or arrangements, necessary for the scenario (including the NRC for notifications and/or ERDS data),
 - This should include documenting if the NRC Resident Inspectors will be participating as responders to the scenario, that they participated in any pre-exercise activities attended by the participating ERO, and that they will actively participate in the post exercise critiques as a responder, not as a NRC Resident Inspector evaluating performance,
 - This should include the anticipated regulatory requirements the licensee is working to comply with (i.e., App E.IV.F.2.(b), (c), etc.),
 - This should include all mini-scenarios or applicable event specific information in sufficient detail to allow for effective drill-play, including OSC repair team activities.
 - Pre-staging of ERO staff, and pre-setup of ERO facilities (fully or in-part) is typically unacceptable. However, the scenario (particularly HAB based scenarios) may require pre-staging/pre-setup to take full advantage of the exercise time. This is typically done by the OROs, particularly in the ICP for HAB based scenarios and at remote EOFs and/or JIC/JIS facilities. For whatever reason it is acceptable for licensees to pre-stage/setup to align with the OROs or whenever the exercise performance would benefit from more exercise time. This should be documented in sufficient detail, including the justification for it, in the Drill Controller/Evaluator manual.
- Current ORO Extent of Play agreements and associated Points-of-Contact.
- Updated logistics for the exercise:

- Room for the inspection team to work during the inspection,
- Badging and dosimetry (as needed) support information.
- Entrance time and location, if licensee desires one.
- Scenario review meeting, time and location.
- Facility walkthrough times (if needed).
- Exercise day, including:
 - Exercise critiques times/locations.
 - Exercise controller debriefs (unless licensee specifically asks the NRC to not observe).
 - EP staff debriefs (unless the licensee specifically asks the NRC to not observe).
 - Licensee exercise results meeting with site management, time/date/location.
 - NRC meeting/exit with site management, time/date/location.
- FEMA AAR from last evaluated exercise (copy of AAR or a link to it).
- Other (as determined by regional inspector)

Attachment 3: Revision History for IP 71114.01

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public Information)
C1		<p>Completed four-year historical CN search.</p> <p><i>Provide guidance for staff review and understanding of DHS deficiencies. (10/26/05, SRM to SECY-05-0045 (ML052990321)</i></p>	None	N/A
C2	06/29/06	<p>Add previously deleted inspection requirement considered necessary for the baseline inspection program. (09/09/01, "Davis-Besse Lessons Learned Task Force" (ML101060482) Item No. 3.3.4.7.</p> <p>Complete rewrite of document structure to better align it with MC 0612 and SDP Appendix B, additions to meet two commitments, change in requirements for co-located sites, add revision history page. Completed four-year historical CN search.</p>	None	ML061580338

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public Information)
	ML12100A221 05/29/12 CN 12-008	<p>Note: The text has been annotated only to show new or amended technical positions; editorial or formatting changes are not highlighted</p> <p>Essentially complete re-write of document structure to better align it with MC 0040, reduce material properly covered elsewhere, broke up large paragraph blocks into subparagraphs, transferred in guidance on critiques and identification of weaknesses from EP SDP that is better served in the IP,</p> <p>Removed "Inspection Bases" in accordance with IMC 0040 "Preparing, Revising and Issuing Documents for the NRC Inspection Manual" formatting expectations.</p> <p>Changes made to address final EP rulemaking including: scenario review per new attachment 71114.08; reference to ISG for classification timeliness; and included backup and alternate facilities to ERF review guidance.</p> <p>Revised discussion on prompting and changed phrase to coaching. Corrected text that implied that only RSPS weaknesses warranted discussion.</p> <p>Added new inspection requirement 02.04 and guidance section 03.04 to include "If the exercise scenario contains demonstration of strategies, procedures, and or guidance developed under § 50.54(hh)(2) observe and evaluate the implementation of these activities." Trimmed 03.06 to remove guidance on how to process a failure to comply—covered in EP SDP. Expanded shortened citation of IV.F.2.f to restore text needed to understand scope.</p> <p>Added section 71114.01-05 "RERERENCE"</p> <p>Added Attachment 1</p>	Provided at national EP counterpart meeting, conducted between September 6-9, 2011	ML12100A231

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML15084A195 07/21/16 CN 16-017	<p>Added "Note" to the Inspection Objective section describing expected actions for a biennial evaluated exercise at which INPO will be observing or auditing.</p> <p>Added to guidance step 03.10 a public meeting statement option for situations in which change(s) to the e-plan that may have reduced its effectiveness have not yet been reviewed.</p> <p>Editorial changes</p> <ul style="list-style-type: none"> - Changed "corrective action system" to CAP - Align procedure with standard section numbering format of completion section under 711xx.xx-05 and the references under 711xx.xx-06 (see ROP Feedback Form 71114-1925) - Reformatted Attachment 1 "Prioritization Of Additional Areas For Inspection" and reordered additional areas for inspection based on branch chief comments. - References, IP 71111.05T "Fire Protection (Triennial)" and MOA with INPO dated 9/11/13 <p>Added to section 71114.08-05 "Procedure Completion" the IP 71152 "Problem Identification and Resolution" expectation for routine PI&R activity reviews to be approximately 10 to 15 percent of the baseline cornerstone inspection procedure resources estimates. The 10 to 15 percent approximation is based on the overall expected inspection effort and is a general estimate only.</p>	None	ML15084A214 Feedback Form 71114.01-1925 ML15236A354

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public Information)
	ML24298A075 07/01/26 CN 26-029	<p>Per EP Initiatives implemented per EO 14300 Section 5(g) and the Advance Act, Sect 507.(d)(1)(A, B, and C). These changes are based upon:</p> <ul style="list-style-type: none"> • Rebaseline of EP Inspection Procedures to incorporate lessons-learned, enhance inspections, and reinforce the requirements for qualified inspectors, including enhancing PI&R guidance. • Incorporated EP IP frequency and resource planning information. • Incorporated "Request for Information" guidance into an appendix. • Add guidance for effective PI&R. 		