

INSPECTION PROCEDURE 71114 ATTACHMENT 3

EMERGENCY RESPONSE ORGANIZATION STAFFING AND AUGMENTATION SYSTEM

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
Staffing and augmentation system review	02.01-02.02	Biennial	1	1	4-5 hours

71114.03-01 INSPECTION OBJECTIVE

To evaluate the adequacy and effectiveness of the programs for the:

- 01.01 Emergency response organization (ERO) on-shift and augmentation staffing levels,
- 01.02 ERO augmentation activation system,
- 01.03 ERO respirator qualifications, including respirator glasses.

71114.03-02 INSPECTION REQUIREMENTS

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

02.01 Review ERO On-shift Staffing and Augmentation

- a. Determine licensee E-plan commitments for ERO on-shift and augmentation staffing levels including alternative emergency response facilities, and the ERO activation process.

- b. Review the licensee's ERO on-shift and augmentation staffing described in the licensee's E-plan to verify the licensee's compliance with its commitments and the conclusions of the detailed on-shift staffing analysis (OSA) required by Appendix E §IV.A.9.
- c. Verify the processes for maintaining required on-shift and augmentation staffing levels meets E-Plan commitments.
- d. Review the effectiveness of corrective actions related to ERO on-shift and augmentation staffing levels.

02.02 Review of ERO Augmentation Activation System.

- a. Review any changes to the ERO augmentation activation system and process. Initial procedure implementation verified the adequacy of the ERO augmentation activation system design.
- b. Review the results of ERO augmentation drills and/or tests.
- c. Review a sample of ERO augmentation activation system program aspects.
- d. Review a sample of corrective actions related to the ERO augmentation activation system and process and assess their effectiveness.

71114.03-03 INSPECTION GUIDANCE

After initial inspection of the ERO on-shift and augmentation staffing and the augmentation activation system design, subsequent inspections need not repeat the review, but should focus on changes to the ERO on-shift and augmentation staffing, the augmentation activation system design, conduct of system drills and tests, and the effectiveness of corrective actions.

03.01 Review ERO On-shift Staffing and Augmentation.

a. Review the site E-Plan to determine the licensee's commitments for ERO on-shift and augmentation staffing levels, ERO activation timeliness, and associated facility activation goals.

- 1. Identify any changes to the ERO on-shift and augmentation staffing program made by the licensee without prior NRC approval under 10 CFR 50.54(q)(4) and evaluate a sample to ensure that the changes did not reduce the effectiveness of the ERO staffing and augmentation program.
- 2. Determine the licensee's commitments with regard to how the emergency response activation timeliness is assessed (e.g., when the "clock starts" and the "clock stops"). In the absence of an approved alternative, the NRC expects that the clock starts with the declaration of an Alert or higher emergency classification level and ends when the applicable ERO position is ready to assume its assigned functions under the E-Plan. Note that the ERO augmentation program has two parts, (1) staff to relieve the Control Room staff of EP functions to allow them to focus on the event, and (2) staff to support the ERO in the response to a wide spectrum of events.

b. Review the licensee's ERO on-shift and augmentation staffing described in the licensee's E-plan to verify the licensee's compliance with commitments, and to verify that the ERO on-shift staffing is supported by the conclusions of the staffing analysis.

1. Review changes to the staffing analysis and ensure it continues to support the ERO staffing and augmentation plan by ensuring that there are no competing priorities when multiple functions are assigned to a single ERO staff member (on-shift and augmented).
2. Review the backup processes and/or procedures and verify that they can be implemented in the event the normal ERO augmentation activation system is not available.

c. Review any changes to the ERO staffing augmentation processes against commitments in the licensee's E-Plan. Process details may be found in the emergency plan implementation procedures.

1. An effective ERO staffing augmentation process should include the following elements, sufficient to provide reasonable assurance, that ERO activation, augmentation, and associated facility activation goals can be met.
 - (a) Current ERO duty roster that lists only qualified personnel to fill positions required by the E-Plan. Qualifications should include:
 - (1) ERO position specific training.
 - (2) Respirator qualifications and respirator glasses where appropriate.
 - (3) Training for: the proper response to ERO activations for events such as a radiological event, a hostile action event, as well as the use of alternative facilities; onsite protective measures for staff safety, clear reporting instructions in the event the plant is inaccessible.
 - (b) A process to ensure augmentation staffing levels are met and a sufficient number of individuals are available to staff their assigned positions on a continuous basis (e.g., ERO on-shift staffing processes ensure minimum staffing levels are maintained, sufficient depth of qualified individuals, formal rotational assignment schedule).
 - (c) A process capable of ensuring timely augmentation of ERO on-shift staffing in accordance with E-Plan commitments and facility activation goals. The augmentation staff roster may be divided into ERO teams or the licensee may employ an "all-call" approach. The all-call approach may involve all responders, reporting to the site with the first to arrive assuming the ERO positions.
 - (d) An ERO augmentation staff roster review process that ensures staff in positions with E-Plan commitments and facility activation goals continue to be capable of meeting the committed time.

2. Review the implementation of the ERO staffing augmentation process(es) as follows:
 - (a) If available, the performance of an actual event or drill where personnel reported to their duty locations and were timed, OR
 - (b) If available, the performance of drills (e.g., unannounced off-hour report-in drills, unannounced off-hour “call-in” drills, pager/communications tests, etc.) where personnel response was timed. OR
 - (c) The performance of verifying sufficient numbers of ERO members live within the appropriate travel time from their duty locations, **or alternatively, the on-call staff live within the appropriate travel time; it is not necessary that all of the ERO staff for an ERO position with response timing requirements live within this area as they can readily support a 24-hour roster if needed.**
3. Review **ERO training program changes to ensure it continues to meet requirements.**
4. Review a sample of ERO on-shift staff rosters for normal business, after hours, recent weekends and holidays. Focus on positions which are not part of the normal operations on-shift crew such as health physics technicians, chemistry technicians, and maintenance technicians. Verify that all positions **can be** staffed on a 24-hour basis in accordance with E-Plan commitments.
- d. Review a sample of CAP items related to staffing inadequacies and verify the licensee has implemented adequate corrective actions.**

03.02 Review of ERO Augmentation System.

- a. Review changes made to the ERO augmentation activation system hardware, software or procedures since the previous inspection and determine the impact on the effectiveness of the process.**
 1. Determine whether the system is still capable of ensuring timely augmentation of ERO on-shift staffing in accordance with E-Plan activation goals for primary and alternate facilities. Hardware systems, (e.g., pagers, cell phones, automated telephone systems) may be vendor-owned and operated. Changes to these systems may not be apparent, but the licensee is expected to ensure the systems are maintained by conducting system tests or surveillance activities.
 2. Review the licensee’s process for keeping the ERO augmentation system (or call out roster) current with ERO member names and contact information. Determine whether system operation is periodically verified by the licensee.
- b. Review all results of actual E-Plan event activations and a sample of ERO primary and backup augmentation activation system drills (e.g., call-in, report-in) results since the last inspection.**
 1. Determine whether the results have been evaluated accurately and whether the conclusions reached are valid.

2. Determine whether tests of the system adequately verify ERO augmentation times (e.g., call-in drills are supplemented with travel time verification and/or report-in drills are conducted periodically).
3. Verify system testing frequencies meet E-Plan commitments.
4. If no tests, drills or implementations of the backup ERO staffing augmentation activation system have been performed, **and if time permits**, interview a sample of ERO members to determine if they know how to implement and respond to the backup system.

c. Review a sample of program aspects such as:

1. Verify that equipment to notify individual ERO members is available and functional (e.g., pagers, cell phones, automated telephone systems).
2. Review a sample of training records to verify that personnel expected to operate the ERO call out primary and back-up systems have been trained.

d. Verify that **ERO training, staffing, or callout system weaknesses identified during ERO augmentation drills, or failures in system tests, were entered into the licensee's CAP and that the licensee has initiated corrective actions to ensure a functional augmentation process.**

1. Review a sample of the weaknesses identified during ERO augmentation drills, or failures in system tests, performed since the last inspection, to identify any trends or repeat failures and assess the effectiveness of corrective actions.
2. Review corrective actions taken for repeat failures and assess the adequacy of corrective actions.
3. Review all licensee self-assessments of ERO augmentation activation drills and system testing since the last inspection.

71114.03-04 REFERENCES

NSIR/DPR-ISG-01, "Emergency Planning for Nuclear Power Plants"

NEI 10-05, "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities"

END

Attachment 1: Request for Information (RFI)

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

- List of changes (just the title and scope, no details needed) made to the ERO staffing and augmentation plan.
- Copy of ERO staffing plan, both the current version and the version from the beginning of the inspection period.
- Copy of ERO augmentation callout system procedure.
- Test results of augmentation callout system tests performed during the inspection period.
- List of all corrective actions/condition reports (just title and scope, no details needed) related to ERO staffing and augmentation, including any communication/notification system issues and issues related to respirator qualifications and respirator glasses, initiated since the last inspection.
 - This includes those corrective actions/condition reports associated with Control Room staffing and HP staffing as some licensees do not capture the impact on the emergency plan from these issues.
- Copy of procedure(s) related to the site respirator qualification program.
- Copy of procedure(s) related to how the site maintains the respirator qualifications, including those who require respirator glasses, for applicable ERO staff.
- List identifying the ERO positions required to be respirator qualified.
- Copy of procedure(s) related to how EP maintains the ERO staffing depth and is made aware of any issues impacting the required staffing depth.
- Other (as determined by regional inspector)

Attachment 2: Revision History for IP 71114.03

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	10/25/06	Completed 4-year historical CN search	N/A	N/A
CN 06-029	ML061790107 10/25/06	Partial re-write of document structure to add objective for explicit review of ERO staffing levels for adequacy using NUREG-0654, Table B-1 as the standard. Added one Inspection Requirement (.02.02.c) sub-section to make one-to-one correlation with Inspection Guidance. Added clarification on the review of ERO responder training and qualifications.	No	
CN 07-026	ML072250458 08/24/07	Clarification in guidance section, for inspector verification of timeliness, on ERO staff augmentation	No	
N/A	ML12095A279 05/29/12 CN 12-008	Revised to reflect the final EP rulemaking with regard to alternative facilities and on-shift multiple responsibilities (staffing analysis). Added guidance on augmentation timing start and stop. Editorial changes to §03.01.c and §03.02.c to relocate some guidance to be in the proper section. Editorial changes to clarify use of "weakness" in §03.02.d (weaknesses are observed only in drills and exercises). Added new §03.06. Other editorial changes for clarity. Removed "Inspection Bases" in accordance with IMC 0040 "Preparing, Revising and Issuing Documents for the NRC Inspection Manual" formatting expectations.	Provided at 2011 annual EP counterpart meeting.	ML12095A296

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	ML15253A855 07/21/16 CN 16-017	<p>03.02.a.1 – Added “for primary and alternate facilities” to description of facility activation</p> <p>Deleted 03.03 step 3 “Determine whether the licensee has completed the detailed on-shift staffing analysis required by 10 CFR 50 Appendix E §IV.A.9 by the required implementation date of December 24, 2012.” And deleted 10 CFR 50.54(q)(4) or (q)(5) from subsequent “Note” both based on due date past.</p> <p>Removed Note concerning NSIR’s review responsibility for initial detailed ERO on-shift staffing analysis</p> <p>Added note to step 03.01.b.3 describing a 10 CFR 50.54(q) is required for a change to the emergency plan’s OSA.</p> <p>Incorporated numerous Branch Chief editorial comments.</p> <p>Editorial change – 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)</p> <p>Added to section 71114.03-05 “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	<p>ML15253A738</p> <p>Feedback Form – 71114.03-1925 ML15253A731</p>

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)
	ML24309A259 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 attachment. • Add guidance for effective PI&R. • Add guidance for the review of the respirator program including respirator glasses. 		