

NRC INSPECTION MANUAL

CNRI/DOCP/RIB

INSPECTION PROCEDURE 71114 ATTACHMENT 05

MAINTENANCE OF EMERGENCY PREPAREDNESS

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
Program assessment	02.01 – 02.06	Biennial	1	1	9-11 hours

71114.05-01 INSPECTION OBJECTIVE

Evaluate the efficacy of licensee efforts to maintain their Emergency Preparedness (EP) programs in areas not directly inspected in other inspection procedures. This includes, but is not limited to, inspecting the ROP EP performance indicator (PI) data generated during the inspection period, 10 CFR 50.54(t) reports, and any changes made to a Letter of Agreement or Memorandum of Understanding (LOA/MOU) the licensee has with any offsite response organization (ORO) during the inspection period.

71114.05-02 INSPECTION REQUIREMENTS

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

02.01 Review the licensee's corrective action program (CAP), as identified, for EP issues applicable to this inspection procedure.

02.02 Review changes made during the inspection period to any LOA/MOU made with an ORO that supports the emergency plan (E-plan) for appropriate content and to verify they have not expired.

- 02.03 **Review audit(s) performed in accordance with 10 CFR 50.54(t), or any other audit, issued during the inspection period.**
- 02.04 **Review how licensee EP staff tracks and responds to Equipment Important to Emergency Response issues identified during the inspection period.**
- 02.05 **Review how licensee EP staff develops, evaluates, and submits ROP EP PI data.**
- 02.06 **Review how the licensee EP staff reviews FEMA After-Action Reports (AARs).**

71114.05-03 INSPECTION GUIDANCE

- 03.01 Review a sample of **corrective action program** documentation, **initiated during this inspection period**, from the following areas to ensure weaknesses are being captured and CAP inputs are being appropriately classified **and** prioritized.
 - Emergency response facilities (Control Room (CR), Technical Support Center (TSC), Operations Support Center (OSC), Emergency Operations Facility (EOF), Joint Information Center/Joint Information System (JIC/JIS))
 - LOAs/MOUs with OROs
 - Audit results
 - Equipment Important to Emergency Response, including sirens (if applicable)
 - ROP EP PIs
 - FEMA AARs
 - Evaluation of evacuation time estimates (ETE), including any related changes to protective action recommendations
- 03.02 Verify arrangements (**LOAs/MOUs**) for offsite response organization (ORO) resources remain in effect and have not expired
- 03.03 Evaluate adequacy of audits issued during the inspection period and ensure they comply with regulatory requirements, with a focus on the interface with state/local organizations.
- 03.04 Evaluate adequacy of licensee EP staff tracking issues, and corrective actions, with Equipment Important to Emergency Response issued during this inspection period. This includes the effectiveness of any compensatory measures implemented.
- 03.05 Evaluate adequacy of licensee EP staff in determining, evaluating, and submitting ROP EP PIs during the inspection period. The EP PIs are Drill and Exercise Performance (DEP), Emergency Response Organization Drill Participation (ERO), and Emergency Response Facility and Equipment Readiness (ERFER). This review is intended to be done by sampling, not a full inspection of the details surrounding each PI opportunity.

EP01: Drill/Exercise Performance (DEP)

To verify the accuracy of the reported opportunities, inspectors should review all actual emergency plan implementation events and evaluated exercise opportunities and a sample of drill and training evolution opportunities. Inspectors should also review a sample of failed opportunities to classify, notify, and develop PARs and verify that the licensee appropriately entered the issues into its CAP. Inspectors should verify that the

first offsite notification was made within 15 minutes to be counted as successful as required by NEI 99-02. These verifications may be completed as samples under IP 71114.01 and IP 71114.06.

EP02: Emergency Response Organization Drill Participation

To verify the accuracy of the reported percentage of key ERO members that have participated in a drill, exercise, or actual event during the previous eight quarters, inspectors should verify number of key ERO members and the number of key ERO members who have participated in a drill/exercise in last eight quarters. Inspectors should also review a sample of drill attendance records to verify the number reported as having participated.

EP04: Emergency Response Facility and Equipment Readiness

The intent of this PI is to provide a measure of the effectiveness of licensee EP staff in maintaining facilities and equipment necessary for effective implementation of the emergency plan. It is not intended to provide a measure of the effectiveness of how other licensee programs maintain other equipment necessary for emergency response; this is addressed in other areas of the ROP. The ROP was developed with the intent to have a PI for measuring EP staff effectiveness at being responsible for maintenance activities. The maintenance activities initially considered were those related to fixed sirens or for equipment and facilities necessary for emergency response. Siren maintenance (availability) was initially chosen for implementation of the ANS-PI within the EP Cornerstone of the ROP. However, with the retirement of the ANS-PI due to increased implementation of non-siren based ANS designs, the implementation of the ERFER-PI provides consistency with the overall intent of the ROP as initially developed. The ERFER-PI is intended to provide a measure for how licensee EP staff maintain the equipment within the emergency response facilities necessary to implement the risk-significant planning standards (RSPS), i.e., the technical support center (TSC) and emergency operating facility (EOF).

03.06 Evaluate the adequacy of licensee EP staff in reviewing FEMA AARs issued during the inspection period.

71114.05-04 REFERENCES

EPFAQ No. 2012-005, "What is the timeline for the implementation of protective action recommendations per the revised NUREG-0654, Supplement 3 following the ETE 180 day review period?" (ML12348A786)

EPFAQ No. 2013-004, "Eight questions concerning the implementation of NUREG-0654/FEMA-REP-1, Supplement 3, Guidance for Protective Action Strategies." (ML14007A652)

EPFAQ Number: 2012-003, "Clarify the acceptable means for documenting discussions between licensees and OROs on the development of mutually acceptable PAR logic using Supplement 3 to NUREG-0654/FEMA-REP-1." (ML12171A567)

IN 05-19, "Effect of Plant Configuration Changes on the Emergency Plan" (ML051530520)

NUREG/CR-4831, "State of the Art in Evacuation Time Estimate Studies for Nuclear Power Plants," March 1992.

NUREG/CR-6863, "Development of Evacuation Time Estimates for Nuclear Power Plants," January 2005.

NUREG/CR-7002, "Criteria for Development of Evacuation Time Estimate Studies

RG 1.219, "Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors"

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 any Letter of Agreement (LOA) or Memorandum of Understanding (MOU) the licensee has with any offsite response organization (ORO) during the inspection period.
- A copy of the 10 CFR 50.54(t) report issued since the last inspection, or any other audit performed during this inspection period.
- List of all corrective actions/condition reports (just title and scope, no details needed) related to the emergency response facilities (CR, TSC, OSC, EOF, JIC/JIS) initiated since the last inspection.
- List of all corrective actions/condition reports (just title and scope, no details needed) related to equipment important to emergency response initiated since the last inspection.
- All ROP EP PI data since the last inspection, for DEP, ERO, and ERFER, and any associated corrective actions/condition reports.
- Procedure(s) for evaluating, maintaining, and submitting the ROP EP PI data.
- Procedure(s) for EP staff review of FEMA after action reports (AARs) issued during the inspection period.
- Other (as determined by regional inspector)

Attachment 2: Revision History for IP 71114.05

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information)
N/A	10/25/06	Completed 4-year historical CN search.	N/A	N/A
	10/25/06 CN 06-029	Revised to clarify that this inspection is associated with Planning Standard 10 CFR 50.47(b)(14), to focus on the timeliness and effectiveness of corrective actions based on safety significance, and conform to the ROP emphasis on correction of EP weaknesses	No	ML061790135
N/A	ML12122A958 05/29/12 CN 12-008	<ul style="list-style-type: none"> • Changed Problem Identification & Resolution (PI&R) references to Corrective Action Program (CAP). • Removed "Inspection Bases" in accordance with IMC 0040 "Preparing, Revising and Issuing Documents for the NRC Inspection Manual" formatting expectations. • Added a "Reference" section. • Reformatted "Inspection Requirements" section to align with "Inspection Guidance" section of MC 0040. Deleted "Level of Effort" section; no longer in MC 0040. • Added inspection requirements and corresponding guidance sections: • 02.08 Review Letters of Agreement and/or Memorandums of Understanding (LOA/MOU) that support the E-plan • 02.09 Review 10 CFR 50.54(q) plan change process and practice. • 02.10 Review licensee maintenance of equipment important to emergency preparedness. • 02.11 Review licensee record(s) of ETE population evaluation. 02.12 Review licensee E-plan provisions for, and implementation of, primary, backup and alternate emergency response facility 	Yes - Provided at EP Face to Face counter-part meeting 09/09/2011	ML12122A943

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information)
N/A	ML15254A401 07/21/16 CN 16-017	<ul style="list-style-type: none"> • Added note to step 03.10.b describing NUREG-0654 Sup 3 dated July 1996 is no longer acceptable guidance. • Added inspection guidance for reviewing PAR strategy procedures and appropriate updates based on changes in ETE times. • 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). Added inspection requirement and corresponding guidance section to review implementation of ETE update values. • Moved Review 10 CFR 50.54(q) plan change process and practice from IP 71114.05 to 71114.04. EPFAQs 2012-003, 2012-005 and 2013-004 to the “Reference” section. • Added to section 71114.05-05 “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. 	No	ML15084A214

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information)
	ML24309A272 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 added to an attachment. • Add guidance for the review of ROP EP PIs and FEMA AARs 		