

NRC INSPECTION MANUAL

CNRI/DOCP/RIB

INSPECTION PROCEDURE 71114 ATTACHMENT 06

NRC RESIDENT – EVALUATION OF EMERGENCY PREPAREDNESS PROGRAM

Effective Date: July 1, 2026

PROGRAM APPLICABILITY: IMC 2515 A

CORNERSTONE: Emergency Preparedness

INSPECTION BASES: IMC 0308 Attachment 2

SAMPLE REQUIREMENTS:

Sample Requirements		Minimum Baseline Completion Sample Requirements		Budgeted Range	
Sample Type	Section	Frequency	Sample Size	Samples	Hours
Emergency Preparedness Plan Activity	03.01	Biennial	3, regardless of number of units	3	5-7 hours

71114.06-01 INSPECTION OBJECTIVE

To evaluate the adequacy and capability of the licensee's ability to implement maintenance, drills, or other selected activities in accordance with emergency plan requirements.

71114.06-02 INSPECTION REQUIREMENTS

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

The intent of this inspection procedure is to evaluate the licensee's ability to implement areas of the emergency plan other than the NRC evaluated biennial exercises. Therefore, this inspection sample is to be completed independent of the NRC evaluated exercise (i.e., not at the same time as IP 71114.01 "Exercise Evaluation") and is performed by the NRC resident inspectors in the calendar year between evaluated biennial exercises (i.e., the off year).

(Note that activities performed by the licensee for the purpose of outside organization observation or audit, such as Institute of Nuclear Power Operations or peer audit team, should not be selected as part of this inspection procedure's sample as these activities may not be performed in a manner that accurately represents how the activity would occur if an event were to occur, or the activity may include real-time direction or discussion with the INPO or peer audit team such that the critique process would not

provide the same level of insight into program adequacy as a critique involving only licensee employees.)

02.01 Perform an independent observation of three EP activities to assess licensee performance during the year between evaluated biennial exercises.

71114.06-03 INSPECTION GUIDANCE

03.01 Review licensee demonstration of emergency preparedness activities to assess compliance with the approved emergency plan, as well as appropriate use of the corrective action program.

Specific Guidance

a. Sample Selection

Select a sample of three EP activities from the following, distributed throughout the calendar year, in order of priority for consideration:

- Drills or training evolutions identified as contributing to the Drill and Exercise Performance (DEP) and/or the Emergency Response Organization (ERO) performance indicators (PI). Obtain the licensee's schedule of EP drills or training evolutions identified as opportunities for the DEP-PI and/or the ERO-PI. Note that the licensee is not required to include simulator-based licensee operator required training (LORT) training evolutions in DEP PI opportunities. Additionally, the licensee may wish to collect "as found" operator proficiency information. There is no intent to disrupt ongoing operator qualification programs.
- Drills or training evolutions that are required by the emergency plan but do not contribute to the DEP or ERO PIs.
- Emergency response organization (ERO) callout or augmentation drills, as required by the emergency plan.
- ERO training and focused area practice and demonstrations.
- Emergency plan required maintenance activities, including applicable EP equipment inventories, communication system functional tests, ERDS testing, dose assessment model testing, etc.
- Other emergency plan activities as appropriate and as discussed with regional EP inspectors and/or NRR/EPLBB staff.

Activities that emphasize the significant activities of classification, notification, dose assessment and protective action recommendation (PAR) development should be prioritized if possible. A review of licensee emergency plans, and how they implemented Section N of NUREG-0654 may assist in the determination of potential activities for observation and evaluation. Licensees develop and maintain schedules for each of these activities which should be available to assist in inspection planning. The intent of the inspection is to distribute samples evenly throughout the year, however priority

should be given to significant areas of the emergency plan, as described in IP 71114, over even distribution of samples.

If the selected sample contains DEP and ERO PI opportunities, determine if the licensee assessment of these opportunities is accurate.

Other activities selected for observation and evaluation should be evaluated to ensure compliance with the approved emergency plan and associated procedures. NEI 99-02 can assist with applicable ROP guidance, and NUREG-0654 can assist with understanding the intent of the associated regulation(s).

Problem Identification and Resolution

Evaluate licensee's ability to identify and correct issues of concern, including an assessment of the treatment of any potential recurring weaknesses. If the activity is associated with a drill or exercise, observe the licensee's critique to determine if the licensee critique identified all weaknesses observed by the inspector and that they enter the identified weaknesses into the corrective action program to allow NRC review of the resolution in a future inspection. If the licensee fails to identify an issue noted by the inspector, this critique failure is to be assessed for significance. Note that poor performance in a drill or exercise is not necessarily a regulatory issue if the licensee corrects the performance issue and enters it into its CAP. DEP and ERO PIs capture performance failures and provide additional context for the overall health of the program. Unless the PI crosses the "green band" threshold, increased NRC involvement is not typically warranted.

For repetitive issues, the inspector should use previous drill and training critiques to determine if previously identified weaknesses represent a trend or a repeat (i.e., recurring, with the same or similar cause) weakness. Review specific corrective actions identified for the previous weaknesses, as well as similar occurrences in response to actual events, drills, exercises and training evolutions to verify completion of associated corrective actions. Consider the status of the DEP and ERO PIs as well as the status of the relevant risk significant planning standard components of the DEP PI.

b. Assessment of Licensee Performance

Evaluate licensee performance to identify failures to comply with regulatory requirements, including any noted program element issues related to the effectiveness and adequacy of the E-Plan, or its implementing procedures¹ observed during the drill and/or training. If there is an apparent failure to comply with the associated 10 CFR 50.47(b) planning standards and Appendix E requirements, assess significance in accordance with the EP Significance Determination Program. Confer with regional management and the Office of the Chief Nuclear Reactor Inspector, Division of Oversight and Compliance Programs, Reactor Assessment Branch (RAB) and Reactor Inspection Branch (RIB) staff for direction.

¹ The E-plan contains the licensee's commitments to NRC regulations. The implementing procedures are the licensee's methods of implementing those commitments and may be used to judge effective, timely, and accurate implementation.

71114.06-04 REFERENCES

NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 8
(ML24331A114)

END

Attachment 1: Request for Information (RFI)

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

- Schedule of DEP-PI opportunities
- Schedule of EP-related, scheduled, activities (i.e., tests, drills, etc.)
- Other, as determined by resident inspector

Attachment 2: Revision History for IP 71114.06

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	Minor wording changes to clarify that the Emergency Preparedness (EP) cornerstone licensee response band is established by the performance indicator system and the licensee's corrective action program, the importance of the formal critique process to identify EP weaknesses, and that this inspection activity is associated with planning standard 10 CFR 50.47(b)(14).	No	ML061790139
N/A	ML12100A225 05/29/12 CN 12-008	<p>Added:</p> <ul style="list-style-type: none"> • "Reference" section • To Inspection Requirement 02.01 "The inspection sample should include, to the extent possible, all types of scenarios (e.g. 10 CFR 50.54(hh)(1) & (2), radioactive release, no release, etc.)." • To Inspection Requirement 02.02 guidance to use the review DEP PI individual inputs for degraded performance and/or adverse trends to ensure areas of weakness are observed. • Note If the last Hostile Action Base (HAB) evaluated exercise was greater than 8yrs ago, request the licensee demonstrate the emergency preparedness support for the next Force-on-Force drill or exercise • Inspection Requirements 02.04 to identify recurring weaknesses and 02.05 to identify failures to comply with regulatory requirements and corresponding guidance sections • To guidance section 03.01 information stating if the scenario is a hostile action event, the inspector should review the requirements of 10 CFR 50.54 (hh)(1) and (2). • Attachment 1 "Prioritization of Additional Areas for Inspection." • Removed "Inspection Bases" in accordance with IMC 0040 "Preparing, Revising and Issuing Documents for the NRC Inspection Manual" formatting expectations. 	Provided at EP Face to Face counterpart meeting 09/09/2011	ML12100A235

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	ML15246A245 07/21/16 CN 16-017	<p>Added drill selection guidance to Inspection Requirement 02.01 regarding drills that include outside organization observation or audit should be chosen as sample for this IP</p> <p>ROP Feedback Forms</p> <ul style="list-style-type: none"> • 71114.06-1952: Added detail to inspection objective and procedure completion sections stating the three inspection samples required by this procedure cannot be satisfied by participation in the performance of IP 71114.01 or 71114.07 • 71114.06-1872: Corrected 1st note under 03.03 to state no increase in NRC involvement is warranted until the PI green, white threshold is crossed • 71114-1925 (Editorial change): Align procedure with standard section numbering format of completion section under 711XX.XX-05 and the references under 711XX.XX-06 	N/A	<p>ML15252A202</p> <p>Feed Back Forms 71114.06-1952 (ML15252A231) 71114.06-1872 (ML15252A364) 71114.06-1925 (ML15252A252)</p>

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)
	ML24309A275 07/01/26 CN 26-029	<p>Editorial change: reformatted Attachment 1 “Prioritization Of Additional Areas For Inspection” and reordered additional areas for inspection based on branch chief comments.</p> <p>Added NSIR/DPR-ISG-01, “Emergency Planning for Nuclear Power Plants” (ML1130105230) to the “References” section.</p> <p>Added to section 71114.06-05 “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> <p>Per EP Initiatives implemented per EO 14300 Section 5(g) and the Advance Act, Section 507.(d)(1)(A, B, and C). These changes:</p> <ul style="list-style-type: none"> • Removed Attachment 1 “Prioritization Of Additional Areas For Inspection” • Updated the reference section • Added “Request for Information” Guidance as an attachment. 		