

INSPECTION PROCEDURE 71114

REACTOR SAFETY—EMERGENCY PREPAREDNESS

Effective Date: July 1, 2026

PROGRAM APPLICABILITY: IMC 2515 A

71114-01 INSPECTION OBJECTIVES

- 01.01 The objective of this procedure is to gather information to determine, in conjunction with the performance indicators, whether a licensee is meeting the **Emergency Preparedness (EP) Cornerstone Objective and Performance Expectation as defined in IMC 0308, Attachment 3, Appendix B, “Technical Basis for Emergency Preparedness Significance Determination Process.”**
- 01.02 This inspection procedure (IP) is considered to be part of each EP IP and will be implemented in parallel with each EP IP as applicable.

71114-02 INSPECTION REQUIREMENTS

02.01 Baseline inspection requirements are identified in the following inspection procedures, which are divided into three main categories: resident inspector oversight, exercise inspection and program inspection:

| Resident Inspector Oversight | Exercise Inspection | Program Inspection |
|---|---|--|
| NRC Resident – Evaluation of Emergency Preparedness Program (IP 71114.06) | Exercise Evaluation (IP 71114.01) | Alert and Notification System Evaluation (IP 71114.02) |
| | Exercise Evaluation – Scenario Review (IP 71114.08) | Emergency Response Organization Staffing and Augmentation System (IP 71114.03) |
| | | Emergency Action Level and Other Emergency Plan Changes or Evaluations (IP 71114.04) |
| | | Maintenance of Emergency Preparedness (IP 71114.05) |

The requirements found in the **above procedures** represent the minimum inspection activity to be conducted at each reactor site. The expected frequency of inspection is given in each inspectable area.

- 02.02 The accuracy of licensee reported performance indicator (PI) data will be inspected **biennially** using IP 71114.05, “Maintenance of Emergency Preparedness.”
- 02.03 The licensee program for problem identification and resolution will be inspected per guidance **contained in each EP IP as well as Attachment 2, “EP Related PI&R Evaluation.”**
- 02.04 Inspection resources shall be focused on the most significant functions of the emergency plan implementation. Specifically, the inspector should prioritize review of the performance of the ERO in their EP assignments and the reliability of emergency response facilities and equipment important for emergency response, particularly those associated with RSPS functions.

71114-03 INSPECTION GUIDANCE

03.01 General Guidance

- a. To ensure consistency, contact the Office of the Chief Nuclear Reactor Inspector, Division of Oversight and Compliance Programs, Reactor Assessment Branch (CNRI/DOCP/RAB) for the characterization of potential White, Yellow, or Red findings. Program requirements and interpretations are the responsibility of the program office in CNRI.

03.02 Guidance for Performance Indicators

- a. The “Drill/Exercise Performance” PI (DEP PI) monitors licensee performance of event classification, offsite authority notification and protective action recommendation (PAR) development.
- b. The “Emergency Response Organization Drill Participation” PI (ERO PI) monitors licensee efforts to develop and maintain key skills within the ERO through participation in proficiency enhancing evolutions, such as drills **or other performance-enhancing opportunities**.
- c. The “Emergency Response Facility and Equipment Readiness” PI (ERFER PI) monitors the **readiness of licensee emergency response facilities to respond to declared emergency events**. This system has been identified as the most significant equipment system maintained by nuclear plant emergency preparedness programs **that can effectively be monitored by a PI**.
- d. DEP and ERO PIs are linked in that ERO drill participation is credited when performance is assessed for contribution to DEP, **as well as other positions identified by the licensee per Nuclear Energy Institute (NEI) 99-02, “Regulatory Assessment Performance Indicator Guideline.”**

03.03 Guidance on Problem Identification and Resolution

- a. Licensee failures to implement corrective actions necessary to maintain the effectiveness of the EP program, to resolve weaknesses observed in a drill or exercise, to restore compliance with regulatory requirements, or to address an inspection finding should be a focus.
- b. **Weaknesses** in ERO performance appropriately critiqued by the licensee in evaluated exercises, drills, and training are not considered to be findings **unless the impact of the performance deficiency significantly impacts the reasonable assurance position as to the adequacy of the emergency plan**. However, the inspector must ensure that such items are entered into the licensee corrective action system in a manner that will allow review during the subsequent off-year exercise and next biennial exercise. If the licensee fails to identify the weakness, the failure should be documented as a failure to comply with a regulatory requirement and its significance assessed using the EP SDP.
- c. Section IV.F.2.g of Appendix E to 10 CFR 50 requires that all weaknesses or deficiencies that are identified in a critique of exercises, drills, or training be corrected. Inspectors should review the correction of licensee and NRC-identified weaknesses. However, a repeat ERO performance weakness may not **on its own**, represent a failure to correct a weakness. The inspector must review licensee efforts to correct the weakness and the reasons for the repeat problem. If the problem is localized it would not be appropriate to determine that it represents a failure to correct. Guidance on determining the adequacy of licensee efforts to resolve weaknesses is contained in the EP SDP (IMC 0609, Appendix B) and in IP 71114.05.
- d. The inspector should use corrective action system data to identify response areas of concern and deploy inspection resources accordingly.

03.04 Guidance on Significant Areas of the E-Plan.

Implementation of the emergency plan (E-Plan) is dependent on the performance of the ERO in their EP assignments **and the reliability of emergency response facilities and equipment important for emergency response**. There are many areas important to E-Plan implementation, but the most significant areas of performance are:

- a. Risk-Significant Planning Standards (RSPS) (Refer to IMC 0609 Appendix B, 03.02, for additional information).
 1. Timely and accurate classification of events. This includes the recognition of events as potentially exceeding emergency action levels. [10 CFR 50.47(b)(4) and Section IV.C.2 of Appendix E to 10 CFR Part 50]
 2. Timely and accurate notification of offsite governmental authorities. This includes adequate performance of notifications to state and local authorities as specified in the E-Plan. [10 CFR 50.47(b)(5) and Appendix E to 10 CFR Part 50 sections IV.D.1 and IV.D.2]
 3. Timely and accurate development of PARs for offsite authorities. This includes providing PARs to governmental authorities, and the decision-making process to develop the PARs. [10 CFR 50.47(b)(10)]

4. Assessment of offsite consequences. This includes the ability to assess and monitor the magnitude and dose consequences of potential or actual radioactive releases. [10 CFR 50.47(b)(9) and Appendix E to 10 CFR Part 50 sections IV.G and IV.E.2]
5. Emergency response organization (ERO) staffing. This includes the development of a staffing plan for continuous staffing of an on-shift ERO, timely augmentation of response capabilities, and documentation of all applicable offsite response activities and support. [10 CFR 50.47(b)(2) and Appendix E to 10 CFR Part 50 sections IV.A C, and E]
6. Emergency response facilities (ERF): This includes ensuring that adequate ERFs and equipment to support the emergency response are provided and maintained. [10 CFR 50.47(b)(8) and Appendix E to 10 CFR Part 50 section IV.E]

In general, NRC oversight in EP is focused on adherence to the E-Plan with an emphasis on **the functions associated with these PS**, 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.

b. Additional Planning Guidance

1. The inspector should remain alert to the impact that the licensee's performance in **other** areas (e.g., staffing, training, etc.) may have on the licensee's performance in the significant areas.
2. Guidance for deployment of inspection resources beyond the most significant **functions are** provided below **in no particular order. This list is not all-inclusive, and inspectors may select other areas for inspection.** Selection for deployment of inspection resources should be based on knowledge of the program, previous problems, and logistics.
 - (a) Adequacy of worker protection including accountability, evacuation, exposure authorization and thyroid protection, including actions during a hostile action [10 CFR 50.47(b)(10) & (11) and Appendix E to 10 CFR Part 50 sections IV.E and IV.I].
 - (b) Adequacy of interface with offsite authorities (e.g., in the area of PAR communication and technical support). [10 CFR 50.47(b)(6) and Appendix E to 10 CFR Part 50 sections IV.A.7, IV.E.9, and IV.D].
 - (c) Adequacy of arrangements for offsite resources responding to an emergency, including hostile actions, at the licensee's site [10 CFR 50.47(b)(6) and Appendix E to 10 CFR Part 50 section IV.A.7.]
 - (d) Ability to prioritize mitigation and assessment efforts to protect the public health and safety.
 - (e) Command and control [10 CFR 50.47(b)(1)].
 - (f) Ability to diagnose plant accident conditions, other than offsite consequences addressed in the significant area discussion.

- (g) Ability to formulate mitigating actions.
- (h) Ability to implement mitigating actions (e.g., damage control teams) under accident and hostile action event conditions.
- (i) Adequacy of communications between licensee facilities [10 CFR 50.47(b)(6) and Appendix E to 10 CFR Part 50 section IV.E.9].
- (j) Accuracy and completeness of licensee-approved press releases [10 CFR 50.47(b)(7)].
- (k) Incorporating recent operating experience [IMC 2523, “NRC Application of the Reactor Operating Experience Program in NRC Oversight Processes”].

03.05 Guidance on Inspection Staffing, Scheduling, and Logistics

a. General Guidance

The goal of scheduling of these inspection procedures is to ensure that the EP Program is inspected to ensure compliance with the Cornerstone Objective and Performance Expectation. Typically, this is achieved by implementing a two-year cycle, alternating between the evaluated biennial exercise one year followed by a program inspection the next. The additional IPs and inspectable areas for each year are determined by the Regional EP staff in coordination with the specific licensees. Reference IMC 2901, “Team Inspections,” IMC 0305, “Operating Reactor Assessment Program,” and IMC 0301, “Coordination of NRC Visits to Commercial Reactor Sites.” See Attachment 1, “[Typical] IP Resources and Frequencies,” for the EP Cornerstone.

b. Requests for Information (RFI)

Each IP will document the recommended RFI for that inspection area. EP Inspectors may add, or subtract, document requests as necessary to support the inspection. Reference IMC 0620, “Inspection Documents and Records.”

71114-04 REFERENCES

Bulletin 2005-02, “Emergency Preparedness and Response Actions for Security-Based Events.”

IMC 0301, “Coordination of NRC Visits to Commercial Reactor Sites”

IMC 0305, “Operating Reactor Assessment Program”

IMC 0306, “Planning, Scheduling, Tracking and Reporting of the Reactor Oversight Process (ROP)”

IMC 0609 Appendix B, “Emergency Preparedness Significance Determination Process”

IMC 0609, “Significance Determination Process”

IMC 0612 Appendix G, “Emergency Planning Cornerstone - Specific Supplemental Guidance for Appendix B Screening Figures 1 and 2”

IMC 0612, "Issue Screening"

IMC 0620, "Inspection Documents and Records"

IMC 2515 Appendix A, "Risk-Informed Baseline Inspection Program"

IMC 2515, "Light-Water Reactor Inspection Program—Operations Phase"

IMC 2523, "NRC Application of the Reactor Operating Experience Program in NRC Oversight Processes"

IMC 2901, "Team Inspections"

IP 71151, "Performance Indicator Verification."

IP 71152, "Problem Identification and Resolution (PI&R)"

NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," and revisions.

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

Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," all revisions.

RIS 2005-02, "Clarifying the Process for Making Emergency Plan Changes."

END

Attachment 1: [Typical] IP Resources and Frequencies*

| | | | Exercise Year Nominal Hours | Off-Year Nominal Hours |
|-----------------|-----------------------------|---|--------------------------------|---------------------------|
| 71114.01 | Biennial Exercise (or HAB) | Add hours only if co-located licensee needs more members on team (20 hours/member)* | 80 | |
| 71114.07 | Scenario Review | | 10 | |
| 71114.02 | ANS | | | 4 |
| 71114.03 | ERO | | | 4 |
| 71114.04 | EALs/EPlan | | | 12 |
| 71114.05 | Maintenance of EP | | | 9 |
| 71114.06 | NRC Resident - EP Program | NRC Resident | | 5 |
| | | | | |
| [Typical hours] | | | 90 | 34 |

*These are the expected hours. Inspectors should document the actual hours used.

Attachment 2: EP Related PI&R Evaluation

- Note that EP is not part of the scope of IP 71152. If EP issues are discovered during the inspection that relate to general, i.e., not EP specific, PI&R issues, the EP Inspector shall inform the applicable PI&R POC within the region and the Office of the Chief Nuclear Reactor Inspector, Division of Oversight and Compliance Programs, Reactor Inspection Branch (CNRI/DOCP/RIB) .
- The intent of EP related problem identification and resolution (PI&R) inspections is to provide insights into licensee performance in the EP area based upon a performance-based review of corrective action issues, operating experience, and self-assessments/audits if available (including from 10 CFR 50.54(t)).
 - a. More detailed programmatic reviews of licensee performance in the EP area will be conducted during supplemental inspections if established performance thresholds are crossed.
- The primary focus of this EP PI&R review should be on verifying that licensees are identifying issues at an appropriate threshold and entering them into their PI&R program. However, inspectors are not precluded from reviewing corrective action documents once they have been dispositioned to identify potential areas for further inspection.
- The following generic guidance should be used to focus PI&R on the EP Program. In addition, each EP IP will contain focused PI&R guidance related to that IP.
 - a. Licensee staff enter conditions into the licensee's PI&R program at a reasonably low threshold. This threshold shall be low enough to allow for a causal analysis at a level commensurate to the public risk, including implementation of the emergency plan, with a focus on risk-significant planning standards (10 CFR 50.47(b)(4, 5, 9, and 10)) and on implementation-significant planning standards (10 CFR 50.47(b)(2 and 8)).
 - b. Deficient conditions associated with regulatory compliance, or potentially impacting reasonable assurance, are promptly brought to the attention of EP and site management.
 - c. Licensee has an effective trending program which uses EP PI&R program data to identify low level trends with equipment and human performance. The licensee addresses identified issues prior to the issues becoming more significant
 - d. For NRC-identified issue(s), the licensee did not miss opportunities to identify the problem(s)
 - e. The licensee appropriately prioritizes issues in accordance with significance so that licensee resources and oversight are assigned commensurate with the actual or potential consequences of the issue.
 - f. The licensee thoroughly evaluates issues to ensure that resolutions address causes and extent of conditions commensurate with their significance in accordance with their corrective action program procedure and quality assurance plan.
 - g. The licensee effectively schedules and completes corrective action development commensurate with the significance using the work control process.

- h. The licensee appropriately considers the effect on systems important to EP if corrective actions placed in the work control process are deferred or cancelled. This evaluation would include compensatory actions, bridging strategies, or alternative corrective actions to ensure the issue(s) are corrected commensurate with its risk significance.
- i. The licensee ensures that the final corrective actions completed adequately address the original concern.
- j. A review of all completed corrective actions for greater-than-green findings and performance indicators provides additional assurance that the licensee's completed corrective actions for risk-significant performance issues are sufficient to address the root and contributing causes and prevent recurrence.
 - i. Perform follow-up inspection of any Planned (Open) Corrective Actions to Preclude Repetition that were not completed following an IP 95001 or IP 95002 supplemental inspection. Section 11 of IMC 2515, Appendix B, provides additional guidance.

Attachment 3: Revision History for IP 71114

| Commitment Tracking Number | Accession Number Issue Date Change Notice | Description of Change | Description of Training Required and Completion Date | Comment Resolution and Feedback Form Accession Number (Pre-Decisional, Non-Public Information) |
|----------------------------|---|---|---|--|
| N/A | ML061660049 06/29/06 CN 06-016 | Completed 4-year historical CN search. Revised to reflect changes to the procedure attachments, add new procedure Attachment 07, simplify using acronyms, and add new references. | None | ML061580314 |
| | ML12100A241 05/29/12 CN 12-008 | Revised to reflect some aspects of the final EP rulemaking, add new procedure in Attachment 08, Increase priority ranking for evaluation of EP facilities and equipment, and clarify language regarding weaknesses. Added Inspection Requirement 02.05 to address 10 CFR 50, Appendix E, Section IV.F.2 (challenging drills and exercises) requirement for each licensee to conduct a hostile action exercise no later than December 31, 2015 and that the first eight-year exercise cycle will begin in the calendar year of the first hostile action exercise. Added new section title of "Inspection Resource Planning" to Inspection Guidance section. Added Attachments 1 and 2. | Provided at EP Face to Face counterpart meeting 09/09/11 | ML12095A250 |
| N/A | ML20351A226 04/02/21 CN 21-018 | Revised to only match current expectations for IP format. No changes to technical content were made, i.e., admin (formatting) changes only. | None | N/A |

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|----------------------------|---|--|--|--|
| | ML24310A026 07/01/26 CN 26-029 | <p>Revised to remove reference to the ANS-PI and add the ERFER-PI (see SRM SECY-22-0089, ML23040A378). Added clarification in several parts of the IP. Removed Attachment 1 and 2 and placed this information into IP 71114.01. Removed Attachment 3 as it is embedded in the IP already. Added a new Attachment 1 to document the typical resource needs and frequencies for each IP and new Attachment 2 to discuss the PI&R inspection aspect in 71114 IPs. Incorporated changes implemented per the Advance Act, see below.</p> <p>Per EP Initiatives #1, 2, 3, and 4 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. • Incorporate guidance related to remote inspections. • Incorporated EP IP frequency and resource planning information. • Incorporated "Request for Information" guidance in attachments to the IPs. | None | None |