

From: [Paul Elkmann](#)
To: kgoodall@entergy.com; dryan@entergy.com
Cc: [Lee Moore \(He/Him\)](#)
Subject: Draft Documentation from the Exercise Inspection discussion on Dec16
Date: Monday, December 30, 2024 11:44:00 AM
Attachments: GG Req Info Doc.docx

Please take a look at the attached and let me know if you have any requested changes or items to add to the document. I did think of one addition that was not discussed on the call: on the morning of Wednesday the 18th ASAP the team will need a copy of ALL of the player-generated personal logs from the exercise, and all worksheets generated by players (ERO notification forms, dose assessments, KI records, OSC team dispatch forms and team check-in forms, “dose” records, survey maps, engineering calculations, JIC press releases, shift staffing records, shift turnover forms, etc...). Please let me know after you have reviewed the attachment.

Thanks,
Paul Elkmann

**Request for Information for EP Exercise and Performance Indicator Verification
Inspection**

*Docket 05000416 (Grand Gulf Nuclear Generating Station) Inspection Report 2025001
Inspection Procedures 71114.01, 71114.04, 71114.08, and 71151
Draft Scenario In-Office Review: December 16, 2024 – March 21, 2025
Onsite/Inspection Week: March 17 – March 21, 2025*

Please provide the following to support the inspection consistent with the methods and timeframes listed for each.

1) IP 71114.08: Exercise Evaluation – Scenario Review

- a) The licensee will be submitting the draft exercise scenario package to the NRC, with the 60-day submission due date of January 17, 2025. The inspectors will conduct a review of the scenario over the subsequent weeks in accordance with IP 71114.08.

The NRC Lead Inspector will schedule a teleconference to communicate the inspectors' comments and observations associated with the review of the scenario no later than 30 days prior to the exercise. We expect to conduct a teleconference providing comments the week of February 17 to February 21, 2025.

- b) Provide a copy of all Extent of Play agreements associated with the March 18, 2025, plume phase exercise as they become available.
- c) Provide by January 20, 2025, a copy of the exercise scenarios and as-run timelines for the March 2023 and the 2021 biennial exercises (may be uploaded to the electronic database; the 2021 exercise may have been conducted at some other time in accordance with an NRC exemption).
- d) Provide in electronic format at the same time as the preliminary exercise scenario:
- i) The procedure for conducting drills and exercises
 - ii) The EAL procedure that was used to prepare the preliminary exercise scenario and associated basis document
 - iii) A list of weaknesses critiqued from the 2023 and 2021 biennial exercises along with a summary description of their associated corrective actions

2) IP 71114.01: Exercise Evaluation

- a) First day of Onsite Inspection, March 17, 2025 – Please provide hard/paper copies of the final, full, Exercise Manual, one copy per inspector (seven total).
- b) First day of Inspection, March 17, 2025 – Provide a single hard copy document of the current site Emergency Plan and complete set of Emergency Plan Implementing Procedures. These will be used/referenced by the inspection team and returned at the conclusion of the exercise inspection week.
- c) No later than 8:00 AM on Wednesday, March 19 (the morning after the exercise) – Provide copies of all documents generated by participants (players, controllers, and

evaluators) in the conduct of the exercise on Tuesday, March 18, separated by Emergency Response Facility (preferred).

By February 1, 2025, provide via the electronic portal of the station's choosing:

- d) Copies of all finalized and approved Drill and Exercise reports for drills and exercises conducted in CY2023, CY2024, and CY2025, including standalone drills, team drills, dress-rehearsals, etc.
 - e) A list of all EP-related Corrective Action Documents/CRs generated (training, facilities, exercise conduct, PI's, ORO issues, etc.) since March 1, 2023, in a sortable/searchable format (Specific full CR documents will be subsequently requested based on sampling and review by the inspectors and should be available in hard-copy on site March 17).
 - f) A list of all exercise weaknesses identified between March 1, 2023 and the upload date with associated corrective actions
 - g) Activation procedures for all emergency response facilities (CR, TSC, OSC, EOF, JIC)
 - h) Position-specific procedures for the key emergency response organization (any in the ERO statistic)
 - i) Procedures for dose assessment and PARs and environmental monitoring
 - j) Additional procedures may be requested by the inspectors depending on the specifics of the preliminary scenario
 - k) A list of the ERO positions expected to be staffed for the March 2025 exercise (does not have to include names of the designated players)
 - l) Please provide onsite March 17, a list of any exercise weaknesses identified in drills and exercises between February 1 and March 14, a list of corrective action program documents associated with emergency preparedness generated between February 1 and March 14
- 3) IP 71114.04: EAL and Emergency Plan Changes

To be provided by February 1, 2025 via the electronic portal of the station's choosing:

- a) Copy of the 50.54(q) procedure (all versions in use from March 1, 2024 to upload date)
 - b) Listing of all of completed and approved 50.54(q) reviews and screenings performed since June 1, 2024.
 - c) Copy of all 50.54(q) evaluations completed since June 1, 2024.
- 4) IP 71151: PI Verification (ERO Participation, DEP, and ANS) – ANNUAL review
- a) Provide via electronic portal by February 1, the procedure(s) used for EP Performance Indicator data collection and submission (all revisions used during the inspection period of 2nd Quarter through 4th Quarter 2024).

b) Please provide the applicable EP-related Performance Indicator data for the **2nd Quarter 2024 through 4th Quarter 2024 (3 quarters)** by February 1, 2025, via the electronic portal:

- The reported values of the DEP, ERO, and ANS performance indicators
- A list of the DEP opportunities included in the DEP PI for the 3 quarters. The data to be included in the list includes, date of performance, facility (Control Room Simulator, Emergency Operations Facility, Technical Support Center, etc.), number of opportunities on the date of performance, type of opportunity (classification, notification, PAR).
- A list of DEP opportunities performed by the emergency response organization during the 3 quarters that were not included in the DEP PI, along with a memo or other documentation showing that they were excluded prior to being performed.
- Quarterly qualification rosters (or similar) for the key ERO members who were included in the ERO Participation data for the 3 quarters [consistent with the PI request above].

c) Please provide by February 1, 2025, via the electronic portal the following corrective action program information,

- a. A list of corrective action documents generated to document DEP opportunity failures from emergency response organization performance which occurred in the 2nd, 3rd, and 4th Quarters of 2024. When corrective actions have been taken, the documentation should identify the corrective action and any effectiveness reviews that have been performed.
- b. A list of corrective action documents generated to document issues with the training, qualification, and assignment of key ERO personnel. When corrective actions have been taken, the documentation should identify the corrective action and any effectiveness reviews that have been performed.
- c. A list of corrective action documents generated to document failures of silent or audible Alert and Notification sirens during planned tests of the ANS system.

d) Please provide onsite March 17, a hard copy of records of the audible and silent Alert and Notification System tests that were included in the ANS Performance Indicator for 2nd Quarter through 4th Quarter 2024.

e) The inspectors will select specific DEP opportunities to review in detail with the documentation to be available in hard copy onsite on March 17, 2025; the documentation to include, when available, the scenario used for the opportunity(s), the ORO notification form(s) generated in association with any classification opportunity, evaluator worksheets for the DEP opportunity(s), logs kept by evaluators and players which demonstrate the timing of event recognition and classification and transmission of an offsite notification form, the timing of dose assessments used in either classifications or PARs, and the timing of decisions about PARs. Also, any worksheets created by

players having material impact on classifications and PARs (such as a copy of the completed and approved dose assessment).

- f) The inspectors will review in detail the qualification and training records for a sample of the key ERO members who were included in the ERO performance indicator in the 2nd, 3rd, and 4th Quarters 2024. The inspectors will also validate the attendance records for a sample of key ERO members who were included in the 2nd, 3rd, and 4th Quarter ERO performance indicator; the licensee should be prepared to show the date of participation for each key ERO member in each quarter (noting that in the 2nd Quarter 2024 that participation date could be in the 2nd Quarter 2022 and still be a 'success' for PI purposes). The sample selections will be performed onsite
- b) Listing of all CRs related to DEP opportunity failures during the 3 quarters [from April 1, 2024, consistent with the PI request above], in a sortable/searchable format.
- c) Listing of all CRs related to ERO qualification issues/deficiencies during the 3 quarters [from April 1, 2024, consistent with the PI request above], in a sortable/searchable format.

If there are any challenges or questions related to providing the requested materials, please contact the lead inspector (Paul Elkmann, phone: 8179012649), at the station's earliest convenience.

This request does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget under control number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number. [NOTE: Should periodically check the OMB control number for the NRC to see if it has changed]

This e-mail and its enclosures will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding.

[NOTES:

- 1) Send the RFI attached to an email. See the separate email template as an example.
- 2) Have the RFI and its email uploaded in ADAMS. Work with your Administrative Assistant staff to accomplish this. REMEMBER to fill out and attach a NRC Form 665 with the ADAMS request.]