

**DRAFT Y2K CONTINGENCY PLANS**

The staff is to be commended for work it has done to prepare the NRC for Y2K. Notwithstanding that the document is still a draft, I note that the subject report on Y2K contingencies is silent on several areas of potential concern.

The Y2K status report and work plan, prepared by the North American Electric Reliability Council, dated September 17, 1998, points out that the availability of voice and data communications present the greatest operating challenge to the electric power industry. Staff has acknowledged this report. As NRC emergency response is wholly dependent upon such communications, the following areas should be addressed by the staff

- Communications failures may result in isolated plants or regions, under situations in which plant events such as load rejections or equipment failures (such as annunciators) may occur and/or enforcement discretion may be requested. The staff should address the need to develop planning which considers these situations. Communications failures may result in licensees approaching resident inspectors with questions on enforcement discretion. The staff should develop guidance for both NRC staff and licensees in this area. Potential areas to be developed include:
  - Actions to be taken if communications partially or fully fail at a site or region during the Y2K transition, and requests for enforcement discretion are deemed necessary.
  - Planning scenarios and contingencies should evaluate contingencies for and provide time lines for and levels of staff response at headquarters, regions and sites during other critical dates which may cause grid or communications system disruptions. These plans should be communicated and maintained to ensue that the time lines remain viable.
  - These scenarios should incorporate contingencies associated with the internal NRC Y2K contingency planning.
  - Availability of staff for coverage of more than one shift at sites, regions or headquarters may be challenged. The staff should address planning scenarios or contingencies for this concern.
  - Contingency planning should consider the +12 and -12 hours times relative to critical dates, since some failures have been offset by 12 hours.

The task force action items should have target dates established.

Staff should develop and run tabletop exercises and drills modeling potential Y2K scenarios, to evaluate NRC response capability and contingency plans in the event of various severities of communications and power failures. The adequacy of administrative and emergency response guidelines should be evaluated under multiple expected events and enforcement discretion challenges. Resident, regional and headquarters staffs should provide integrated response under various telecommunications and power failure modes. If practicable, staff should consider coordination with drills which licensees have planned to model Y2K challenges.

At a later date commensurate with the completion of plans, Commissioner assistants should be briefed with description of the scope and relevant details of internal and external NRC guidance, in a draft or approved status, which will be used in Y2K contingencies.