

BLOCK 1C — Performance indicator (PI) thresholds are in units of change in annualized Core Damage Frequency (delta annualized CDF). Some events, such as reactor trips may also be counted in PI data.

BLOCK 2 — Licensee notifications in accordance with 10 CFR 50.72 are one means of activating IP 71153 initial event followup by on-site NRC inspectors. If an on-site inspector is not immediately available, this responsibility transfers to the Headquarters Operations Officer until regional personnel can respond.

BLOCK 3 — Management Directive 8.3, Part I includes deterministic criteria. Events meeting criteria which are not risk informed may result in IITs or AITs. Power reactor events/degraded conditions meeting risk informed criteria are evaluated for Conditional Core Damage Probability (CCDP).

BLOCK 4 — Risk analysts use NRC's Standardized Plant Analysis of Risk models and other available tools to estimate event CCDP, which accounts for equipment unavailability for reasons unrelated to performance. Initial estimates of CCDP may be made within 4-8 hours of receiving event information. Inspectors support risk analysts by providing event details such as equipment malfunction/unavailability, operator errors, and equipment out of service for maintenance. They verify availability of mitigation equipment or containment function not required during the event, but which could contribute to increased risk if unavailable. Inspectors use plant-specific SDP phase 2 worksheets to gain qualitative risk insights.

BLOCK 5 — The table on Page 6 of Management Directive 8.3, Part I, lists appropriate power reactor operational event response options (IIT, AIT, SI) as a function of CCDP. This determination considers the uncertainty of influential assumptions and their effect on risk significance.

BLOCK 6 — Special Inspections, Augmented Inspection Teams, and Incident Investigation Teams evaluate events/degraded conditions and their root causes, and identify licensee performance issues.

BLOCK 7 — Licensee performance issues are evaluated with the SDP (considering only performance-related equipment unavailabilities), placing the issues in delta annualized CDF bands.

BLOCK 8 — Because PI thresholds are in units of delta annualized CDF, PIs and SDP results are combined in the NRC Action Matrix to determine agency responses to the performance issues identified by the event response.

LIMITING NRC IMPACT DURING EVENTS

I. Inspector Conduct While in the Control Room

For plant events, inspectors must perform sufficient inspection to develop an independent assessment of plant conditions, which will be used in making decisions on NRC's responses to an event. Activities that form the basis for this assessment may include independent measurements, verifying the accuracy of information, control board walkdowns (to observe annunciators, process parameters, switch positions, and other instrumentation), or assessment of licensed operator performance during ongoing activities.

The NRC's goal is to monitor and assess with as little impact on the licensee as possible and at the same time ensure NRC evaluations are timely and accurate. During plant events, timely and independent inspector assessments are crucial; however, the degree of interaction with operators may be limited in light of ongoing control room activities. The inspector must use judgement in establishing a balance between obtaining necessary information and not being intrusive in licensee response activities. The appropriate balance involves numerous variables, including safety significance of the event, complexity of the event, time constraints, and available staff.

The following guidance is provided to establish consistency for inspector conduct in the control room. When the NRC activates its emergency response plan, inspectors should follow the guidance in the applicable emergency response procedure. This guidance is intended for use in situations where the NRC has not activated its emergency response plan; however an abnormal event has happened at the plant. Inspectors should note that some of the guidance, such as inspector location in the control room and not interrupting operators, apply to all emergency situations. While this guidance deals mainly with event responses, specific attributes are applicable to inspector interaction with operators during normal conditions both in and outside the control room.

- a. During the initial response to events, the assigned senior resident inspector (SRI) or the inspector acting in this capacity is in charge of all other NRC inspectors. These inspectors will take their direction from the SRI.
- b. The number of inspectors in the control room at any given time should be the minimum number needed to accomplish the agency's work. Typically there should be only one inspector in the control room during an event, unless special circumstances warrant additional inspectors. If several inspectors or other NRC personnel are in the control room during an event, the SRI or resident inspector will be in charge of them and will determine and communicate to the other inspectors and personnel what, if any, assistance is needed.
- c. Inspectors will adhere to the licensee's established administrative policies regarding entry into the restricted or "at the controls" area of the control room. For example, the inspector may need to ask the control room SRO or RO for permission to enter the restricted area. Under no circumstances should the

inspector demand entry into the restricted area. If such entry is denied, the inspector should escalate the request to the licensee's management and inform NRC management of the problem. For general access to the control room, the licensee's policy should recognize that inspector access will be unannounced. Inspectors who do not routinely enter the control room should identify themselves to the operators when they enter the control room.

- d. While observing ongoing activities in the control room, the inspector should be in a location which is out of the way of operators and does not obstruct their view of the reactor controls and instrumentation, yet the location provides the inspector with a broad view of the control room. An acceptable location outside the restricted "at the controls" area is preferable. It is recognized that short amounts of time in the restricted area may be necessary at appropriate stable time periods to verify significant parameters.
- e. Operators should not be interrupted, questioned or otherwise distracted from performing their duties while responding to an event or while performing other duties where their attention must be focused on the task at hand. Also, inspectors should not interfere, interrupt, or otherwise disturb communications between operators and communications between operators and their supervision.
- f. If an inspector identifies a significant problem or question about plant or operator safety that needs to be addressed in an urgent manner, then the inspector should discuss it quickly and quietly at a time when it will not interrupt ongoing operator actions. This discussion should be held with the shift supervisor or emergency response manager. However, it may be appropriate to interrupt the operator if the inspector feels that an operator action may endanger plant personnel or the plant. Inspectors should hold their non-urgent questions for a more appropriate time.
- g. NRC personnel communicating with off-site organizations should generally do so from outside of the control room. Communication is possible from the NRC phone in the TSC or other phones outside the control room that have been agreed to with the licensee. It is acceptable for the inspector to make a phone call from the control room provided the licensee agrees to the use of the phone and the phone conversation will not disrupt control room activities.
- h. Because of the authoritative role of the NRC, licensees listen carefully to inspectors and may interpret statements, side remarks, or observations as directives or requirements. Consequently, open, clear, and direct communications between inspectors and licensees are particularly important during events.

II. Conference Calls With Licensees During an Ongoing Event

When initially responding to an event, the NRC is dependent upon information provided by licensees and inspectors at the plant (typically resident inspectors). This information is used for initially assessing events and making decisions about how to respond to the event. The NRC typically gets this initial information from licensees through their notification to the NRC Operations Center pursuant to 10 CFR 50.72 or from conference calls between the NRC staff and the licensee. The NRC values conference calls as an

efficient method of obtaining accurate and timely information. Such calls promote a mutual understanding of the facts and any concerns.

Caution is needed in scheduling and conducting conference calls when the calls are held during an ongoing event or situations where heightened licensee attention is being directed to a plant evolution. While information obtained in a conference call is extremely valuable to the NRC's overall understanding of a plant event, the overriding goal is that the call will not interfere or detract from the licensee's ability to safely operate the plant. The following guidance should be used for conducting conference calls with licenses during abnormal plant conditions. Examples of abnormal plant conditions would be the declaration of a Notification of Unusual Event (NOUE) or the use of an emergency operating procedure (EOP).

- a. NRC management should decide whether a conference call with the licensee is needed and if conducting a conference call is appropriate at that particular time. NRC management may want to discuss with senior licensee management the possibility of conducting a conference call. The stability of the plant is the primary factor in deciding on a conference call. Other factors to be considered in this decision include: the current level of NRC staff understanding and information available for the event; the safety significance of the event; the complexity of the event; and the current level of licensee activity in mitigating the event.
- b. Generally the licensee should be informed of the NRC's desire to have a conference call by the senior resident inspector or resident inspector if they are available. The licensee must be included in deciding the most appropriate time for the call so that the call does not interfere with plant response activities. Also the licensee should decide which individuals from their staff will participate in the call.

When requesting the conference call, the licensee must be clearly informed of the NRC's desire that the conference call not interfere with their response to plant conditions and that delaying the call is a valid option for them.

- c. NRC technical staff and management with the right background should participate in the conference call to ensure proper questioning and understanding of the event and associated issues. The senior NRC manager on the call should identify his/her self and is responsible for ensuring that the conference call discussions are properly focused on important issues and that side issues are discussed at another time.
- d. If time allows, an agenda for the conference call should be developed to ensure the call remains properly focused. The licensee should be informed of the proposed discussion topics and planned NRC participants to allow the licensee to prepare for the call.
- e. Any follow-up actions resulting from the conference call should be summarized at the end of the call by an NRC manager to ensure the licensee clearly understands and agrees with the actions.

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