INSPECTION PROCEDURE 71114

REACTOR SAFETY—EMERGENCY PREPAREDNESS

PROGRAM APPLICABILITY: 2515

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 Cornerstone Objective and Performance Expectation.

01.02 The cornerstone Objective is “To ensure that the licensee is capable of implementing adequate measures to protect the public health and safety in the event of a radiological emergency.”

01.03 The Cornerstone Performance Expectation is “Demonstration that reasonable assurance exists that the licensee can effectively implement its emergency plan to adequately protect the public health and safety in the event of a radiological emergency.”

71114-02 INSPECTION REQUIREMENTS

02.01 Baseline inspection requirements are identified in each of the attached inspectable areas:

a. Exercise Evaluation (Attachment 01)
b. Alert and Notification System Testing (Attachment 02)
c. Emergency Response Organization Augmentation (Attachment 03)
d. Emergency Action Level and Emergency Plan Changes (Attachment 04)
e. Correction of Emergency Preparedness Weaknesses and Deficiencies (Attachment 05)
f. Drill Evaluation (Attachment 06)

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

02.03 The accuracy of licensee reported performance indicator data will be inspected annually using Inspection Procedure 71151, “Performance Indicator Verification.”

02.04 The Licensee program for problem identification and resolution will be inspected annually using Inspection Procedure 71152, “Identification and Resolution of Problems.”

General Guidance

Performance Indicators

a. The “Drill/Exercise Performance” performance indicator monitors licensee performance of event classification, offsite authority notification and protective action recommendation development.

b. The “Emergency Response Organization Drill Participation” performance indicator monitors licensee efforts to develop and maintain key skills within the emergency response organization through participation in proficiency enhancing evolutions, such as drills.

c. The“Alert and Notification System Reliability” performance indicator monitors reliability of the alert and notification system. This system has been identified and the most risk-significant equipment system maintained by nuclear plant emergency preparedness programs.

d. Drill/Exercise Performance and Emergency Response Organization Drill Participation performance indicators are linked in that Emergency Response Organization drill participation is only credited when performance is assessed for contribution to Drill and Exercise Performance. The details and exceptions to this linkage are contained in NEI 99-02, “Regulatory Assessment Performance Indicator Guideline.”

Disposition Of Findings

a. The need for inspection beyond the Baseline Inspection Program is determined through the significance and number of inspection findings and the status of performance indicators.

b. A Significance Determination Process has been developed for assessing the significance of inspection findings. The details of the Emergency Preparedness Significance Determination Process are contained in Manual Chapter 0609.

c. The Baseline Inspection Program is designed for programs operating in the “licensee response band,” that is, a program with green performance indicators and only green findings. The resources allocated in the Baseline Inspection are not intended to be sufficient for the characterization of potential white, yellow or red findings. Should it be necessary to characterize such findings, and the time involved exceeds a few hours, the time should be allocated to the Significance Determination Process, rather than the Baseline Inspection Program.

Correction of Weaknesses and Deficiencies

a. Findings of a failure to correct a weakness, or observations of program inadequacies should be summarized and provided to the team leader for the annual problem identification and resolution inspection.

b. Weaknesses and deficiencies appropriately critiqued by the licensee in evaluated exercises are not considered findings. 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 two evaluated exercises.

c. Section IV.F.4.g. of Appendix E to 10 CFR 50, requires that weaknesses and deficiencies identified in the EP program be corrected. Inspectors should review the correction of licensee and NRC identified weaknesses and deficiencies. However, in the case of personnel performance, a repeat performance problem may not in itself, represent a failure to correct a weakness. The inspector must review licensee efforts to correct the item 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 problems is contained in Manual Chapter 0612 in the EP SDP and Inspection Procedure 71152.

Risk Significant Areas

Implementation of the Emergency Plan (the Plan) is dependant on the performance of the Emergency Response Organization in their emergency preparedness (EP) assignments. There are many areas important to Plan implementation, but the most risk significant areas of performance are:

a. Timely and accurate classification of events. This includes the recognition of events as potentially exceeding emergency action levels. [10 CFR 50.47 (b) (4)]

b. Timely and accurate notification of offsite governmental authorities. This includes adequate performance of notifications to state and local authorities as specified in the Plan. [10 CFR 50.47 (b) (5)]

c. Timely and accurate development of protective action recommendations for offsite authorities. This includes providing protective action recommendations (PARs) to governmental authorities, the decision making process to develop the PARs. [10 CFR 50.47 (b) (10)]

d. 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)]

In general, NRC oversight in EP is focused on these most risk significant areas and inspection resources should be deployed in a manner to cover these areas.

Prioritization of Additional Areas for Inspection

Guidance for deployment of inspection resources beyond the most risk significant areas is provided below. These areas may generally be considered in order of importance. 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 [50.47(b)(10)&(11)].

b. Adequacy of interface with offsite authorities, (e.g., in the area of PAR communication and technical support) [50.47(b)(6)].

c. Timely activation of facilities [50.47(b)(2)].

d. Ability to prioritize mitigation and assessment efforts to protect the public health and safety.

e. Command and control, [50.47(b)(1)].

f. Ability to diagnose plant accident conditions.

g. Ability to formulate mitigating actions.

h. Ability to implement mitigating actions (e.g., damage control teams) under accident conditions.

i. Adequacy of communications between licensee facilities, [50.47(b)(6)].

j. Readiness and quality of EP equipment and facilities, [50.47(b) 98)].

Scheduling

Attachment 1 should be scheduled for evaluation of the biennial exercise. An exercise is to be evaluated biennially at each licensee site, including one biennial exercise for each licensee at a co-located site. The Performance Indicator Verification (Inspection Procedure 71151) is to be performed annually and should be performed in conjunction with Attachment 1. Attachments 2, "Alert and Notification System Testing," Attachment 3, "Emergency Response Organization Augmentation Testing," and Attachment 5 "Correction of Weaknesses and Deficiencies may be conducted during a single inspection in the year when there is no biennial exercise. IP 71151 should also be conducted at that time. Attachment 4 "Emergency Action Level and Emergency Plan Changes" may be conducted when changes are received and may be conducted in the Regional Office. Attachment 6 "Drill Evaluation,"is conducted annually by the Resident Inspector and may be done whenever convenient to the licensee and inspector schedule.

71114-04 INSPECTION RESOURCES

Estimates of inspection resources are identified within each inspectable area attachment.

71114-05 REFERENCES

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

"Emergency Preparedness Position (EPPOS) on Timeliness of Classification of Emergency Conditions," (EPPOS No. 2.)

"Emergency Preparedness Position (EPPOS) on Emergency Plan and Implementing Procedures Changes," (EPPOS No. 4.)
Inspection Procedure 71152, "Identification and Resolution of Problems."

Inspection Procedure 71151, "Performance Indicator Verification."

END

Attachments:

.01 Exercise Evaluation
.02 Alert and Notification System Testing
.03 Emergency Response Organization Augmentation
.04 Emergency Action Level and Emergency Plan Changes
.05 Correction of Emergency Preparedness Weaknesses and Deficiencies
.06 Drill Evaluation