

ATTACHMENT 71114.05

INSPECTABLE AREA: Correction of Emergency Preparedness Weaknesses and Deficiencies

CORNERSTONE: Emergency Preparedness

INSPECTION BASES: This Inspection evaluates the efficacy of licensee programs that address weaknesses and deficiencies in EP.

The Drill/Exercise Performance (DEP) performance indicator (PI) measures licensee performance in specific risk-significant activities. The Emergency Response Organization Drill Participation PI provides an indication of licensee efforts to develop and maintain key skills through the conduct and evaluation of drills exercises and certain training evolutions. In the course of activities that support both these PIs the licensee is expected to identify weaknesses and deficiencies and subsequently correct them.

These two PIs, complemented by effective conduct of drills and exercises, effective assessment of performance and the effective correction of weaknesses, allows a licensee response band to be established that includes: training quality and conduct, emergency plan implementing procedure quality, facility and equipment readiness, personnel performance in drills and exercises, organizational and management changes and communications equipment readiness.

This inspection evaluates licensee efforts to correct weaknesses and deficiencies.

This inspection verifies aspects of the Emergency Preparedness Cornerstone for which there are no indicators to measure performance.

LEVEL OF EFFORT: Inspection of the correction of EP related weaknesses and deficiencies.

71114.05-01 INSPECTION OBJECTIVE

To evaluate EP-related efforts to correct weaknesses and deficiencies.

71114.05-02 INSPECTION REQUIREMENTS

02.01 Review licensee procedures applicable to the correction of weaknesses and deficiencies identified through the EP program.

02.02 Review all actual emergency plan activations since the last inspection and determine if the licensee effectively implemented the requirements of the Plan. Review licensee self-assessment of actual events for completeness.

02.03 Review the effectiveness of all licensee EP-related corrective actions assigned as a result of an event self-assessment.

02.04 Review a sample of drill scenarios, supporting paperwork and critiques. Determine whether the self-assessment properly identified failures to implement regulatory requirements and PS.

02.05 Review a sample of corrective actions identified as a result of drill critiques or other self-assessments. Identify any problems for which corrective actions may not be effective.

02.06 Review audit(s) performed in accordance with 10 CFR 50.54(t).

02.07 Review a sample of other self-assessment documents, as available (e.g., QA assessments).

02.08 Determine if the identification and resolution of EP related weaknesses and deficiencies has been effective and timely.

71114.05-03 INSPECTION GUIDANCE

The primary focus of this inspection is to evaluate the efficacy of licensee ability to identify and correct weaknesses and deficiencies.

03.01 Review procedures for critique conduct and correction of weaknesses and deficiencies. Responsibility for conduct may be assigned to multiple departments, (e.g., Quality Assurance for audits, Emergency Preparedness for drills and Training for simulator evolutions). Include procedures related to actual events, drills, exercises, audits, program reviews and PI systems.

03.02 For every actual emergency plan activation since the last inspection (if any), review event-related documentation including: notification forms, logs and checklists. Based on event documentation, independently determine if the licensee effectively implemented the requirements of the Plan. Specifically, consider the timeliness and accuracy of classification, notification and PAR development. (Note: events requiring actual emergency plan activation may be inspected under the event follow up inspection.) Review licensee implementation of other aspects of the Plan as appropriate to the event. Consider the completeness of records. Review licensee self-assessment of events. Compare the licensee self-assessment against the inspector's independent evaluation of records of the event(s) to determine if the licensee correctly identified weaknesses and deficiencies. Consider any evaluation documented by the resident inspector concerning event response.

03.03 Review the effectiveness of all licensee corrective actions assigned as a result of an event self-assessment. Determine the effectiveness of licensee corrective actions.

03.04 Select a sample of drills (if available) for review of licensee self-assessments. Review critiques, scenario summaries, EPIP forms and checklists used to support and document classification, notification and PAR development. From review of drill documentation, determine whether the self-assessment properly identified failures to classify, notify or develop PARs in a timely and accurate manner. Other areas of EP may be reviewed in a similar manner. The prioritization guidance provided in section 71114-03 may be used to select other areas for review.

03.05 Review a sample of corrective actions identified as a result of drill or other self-assessment activities. The sample should include all corrective actions associated with classification, notification, PAR development and assessment activities. Additional corrective actions should be selected from across the remaining response areas in accordance with the prioritization guidance provided in section 71114-03. For repeat items or trends determine whether corrective actions should have precluded recurrence. Guidance is provided in Manual Chapter 0612.

The inspector may identify a sample of corrective actions for a detailed review of closure documentation. This may include inspection in the field to verify that terminal conditions are IAW the closure documentation. Equipment and facilities or other areas of EP may be included in this sample as deemed appropriate.

Further, should the corrective action record indicate a lack of effort in a particular area, (e.g., field monitoring team equipment or team member performance), the inspector may sample the area for compliance with Plan commitments. Lack of attention in an area may be indicated by a lack of critique comments (negative and positive) or lack of corrective actions for items which could normally be expected to require maintenance.

03.06 Review audit(s) performed in accordance with 10 CFR 50.54(t). Evaluate adequacy of audits to comply with regulatory requirements. Determine whether the timeliness structure of audits are consistent with regulatory requirements and licensee program changes. Review the effectiveness of a sample of corrective actions identified. Prioritization should be given to problems associated with classification, notification, PAR development and assessment activities. A sample of corrective actions from other areas may also be reviewed.

03.07 Review a sample of other self-assessment documents, as available (e.g., QA assessments.) Review the disposition of a sample of the corrective actions identified. Determine if problems identified in the self-assessments were addressed in an appropriate and timely manner.

71114.05-04 RESOURCE ESTIMATE

The direct inspection effort is estimated to be, on average, between 9 hours and 15 hours biennially regardless of the number of reactor units at a site.

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