

## ATTACHMENT 71114.06

INSPECTABLE AREA: Drill Evaluation

CORNERSTONE: Emergency Preparedness

INSPECTION BASES: The Drill/Exercise Performance (DEP) performance indicator (PI) measures licensee performance in specific risk-significant activities (classification, notification and PAR development). 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. The licensee is expected to identify weaknesses and deficiencies, and 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 the adequacy of the licensee conduct of drills and critique of performance,

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

LEVEL OF EFFORT: Resident Inspector review of drills and certain training evolutions to evaluate drill conduct and the adequacy of licensee critique of performance to identify weaknesses and deficiencies,

71114.06-01 INSPECTION OBJECTIVE

01.01 To evaluate the conduct of selected drills and certain training evolutions.

71114.06-02 INSPECTION REQUIREMENTS

02.01 Determine which drills and simulator-based training evolutions the licensee has identified as contributing to the DEP and ERO PIs. Plan to inspect a sample of them.

02.02 Observe the drill/training evolution and identify weaknesses and deficiencies in classification, notification and PAR development activities.

02.03 Compare identified weaknesses and deficiencies against licensee identified findings to determine whether the licensee is properly identifying failures.

02.04 Determine whether licensee assessment of performance is in accordance with the applicable criteria. The guidance document is NEI 99-02 and is listed in the reference section.

#### 71114.04-03 INSPECTION GUIDANCE

The primary focus of this inspection is to verify licensee critique of classification, notification and PAR development during drills and training evolutions identified as contributing data to the DEP and ERO PIs.

03.01 Obtain the licensee's schedule of drills and training evolutions that will contribute to DEP (and ERO) PI statistics. Inspect one drill and two simulator-based training evolutions in which shift operating crews participate. The resident may perform this activity unannounced.

Note: The licensee is not obligated to include any simulator based training in DEP PI statistics, but may choose to do so in order to credit operating crews for drill participation in support of the ERO PI. Additionally, the licensee may wish to collect "as found" operator proficiency information. There is no intent to disrupt ongoing operator qualification programs.

Review the selected scenario to identify the timing and location of classification, notification and PAR development activities and for licensee expectations of response. Responsibility for classification, notification and PAR development activities may transition from control room to TSC to EOF during a drill. Inspector resources may limit the ability to observe all aspects. However, classification, notification and PAR development performance should be given the highest priority. Guidance is given in section 71114-03 for the prioritization of resources to observe other areas.

Review the EIPs that provide instructions for classification, notification and PAR development activities, to develop an understanding of successful implementation.

03.02 Observe the drill/training evolution. Review checklists and forms used for classification, notification and PAR development activities. Determine whether the drill/training evolution is of appropriate scope to be included in the PI statistics. See NEI 99-02 for criteria. Identify any weaknesses or deficiencies in licensee performance of classification, notification and PAR development, (and other areas as applicable.)

03.03 Compare identified weaknesses and deficiencies against licensee-identified weaknesses and deficiencies to determine whether the licensee is properly identifying

failures in classification, notification and PAR development activities. Verify that the licensee properly dispositions failures with regard to PI statistics.

Poor performance in a drill is not a regulatory issue, if the licensee corrects it or has entered the problem in the corrective action system. The DEP PI captures performance failures and unless the PI falls below the "licensee response band" threshold, correction of drill performance problems is in the licensee response band. However, if the PI falls below the threshold increased NRC involvement is warranted.

Note: Drill and training activities are only included in PI statistics at the discretion of the licensee and must be identified in advance. However, they cannot be removed from the statistics due to poor performance.

03.04 Determine whether licensee assessment of performance is in accordance with the applicable criteria. Refer any discrepancies to regional management.

#### 71114.06-04 RESOURCE ESTIMATE

The direct inspection effort is estimated to be, on average, between 9 hours and 20 hours per year, regardless of the number of reactor units at a site. |

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