

**ATTACHMENT 82001.01**

**ERO PERFORMANCE DRILLS**

82001.01-01           INSPECTION OBJECTIVES

01.01       To verify the extent of condition of performance problems in response to emergency conditions

01.02       To provide inspection information in support of the determination of whether the licensee EP program can meet the EP Cornerstone Performance Expectation and whether the program can operate in the licensee response band.

82001.01-02           INSPECTION REQUIREMENTS

02.01       Specify elements for the drill scenario and communicate them to the licensee. Determine an appropriate schedule for development.

02.02       Determine the appropriate licensee participants for the drill and communicate the list to the licensee. Discuss schedule for the drill and availability of the identified participants.

02.03       Determine through evaluation of ERO performance in drills whether ERO members can implement the Plan as appropriate for the scenario presented.

02.04       Determine through evaluation of an appropriate sample of licensee personnel whether the extent of condition identified by the licensee is correct. Determine whether additional ERO members must be evaluated to verify extent of condition.

02.05       Determine the effectiveness of licensee corrective actions in addressing ERO Performance issues.

02.06       Provide inspection information on the results of drill evaluation to support the determination of whether ERO Performance supports the Cornerstone Performance Expectation.

02.07       Provide inspection information on the results of drill evaluation to support the determination of whether the EP program can operate in the licensee response band.

82001.01-03       INSPECTION GUIDANCE

This section contains both general and specific guidance, and these are not numbered to correspond with inspection requirements in Section 02.

03.01 The scenarios developed should address previously identified weaknesses. It may be appropriate to ask the licensee to develop several scenarios with the understanding that the inspector may use different ones with different participants. The licensee should be informed that the scenarios must be kept confidential. If confidentiality is not maintained, the inspection may be postponed until a later date when confidential scenarios are available for use.

03.02 Scenarios should be designed to address licensee performance problems. However, it should be recognized that the more functions and elements involved, the more resources necessary.

At some point it is more efficient to pursue a remedial exercise (10 CFR 50 Appendix E IV F f,) or a voluntary full scope drill, to demonstrate licensee ability to implement the Plan. In general, a performance drill should be designed to take no more than two hours of participant time.

03.03 The licensee should include the statistics of the performance drills in the EP performance indicator statistics.

03.04 Items to consider for scenarios include:

- a. Various levels of fission product barrier degradation as indicated by primary indicators (e.g., water level, containment pressure, containment radiation monitors).
- b. Events resulting in escalation of fission product barrier degradation causing emergency classification escalation.
- c. Events resulting from exceeding threshold levels in emergency operating procedures.
- d. Events resulting in releases of radioactive material offsite.
- e. Natural events or man-made events, fires, and/or security scenarios.
- f. Concurrent events of differing emergency classification to evaluate the ability to declare the condition of highest severity.
- g. Conditions of rapidly escalating severity to evaluate ability to implement procedural requirements for classification under these conditions.
- h. Failures of primary notification methods, forcing use of backup methods.
- i. Release of radioactive materials to distances that result in PAR's exceeding the licensee's default PAR based on plant conditions.

- k. Security events exceeding General Emergency threshold which do not involve ongoing releases of radioactive material or fission product barrier breach.
- l. Plant condition degradation exceeding General Emergency EAL threshold which does not involve ongoing releases of radioactive material.
- m. Diverse meteorological and temporal conditions (e.g., snow, storm conditions, nighttime, weekend) impacting the ability to evacuate offsite populations.

03.05 Review the ERO duty roster to determine which key ERO members should participate in the observed drills. The list of participants may include as many shift managers and senior management assigned decision making responsibilities in the ERO as can reasonably be scheduled. It is appropriate to observe the senior site manager assigned key ERO responsibilities. The list of participants should be discussed with the licensee to ensure availability during the inspection.

03.06 The inspector and the licensee should take reasonable steps to make the drills closely simulate the actual emergency response task(s). This may be accomplished through the use of the emergency response facilities. Drills should be conducted so as not to interfere with plant operations and activities. The inspector should not interrupt drills, but await the end of performance to ask questions or to determine the causes of problems. Interruptions and numerous probing questions may create an atmosphere in which participants can not respond in a manner that simulates an emergency. Additionally, questioning mistakes may eliminate an opportunity for the responding team to self correct. The scope of each drill may include the unit of personnel expected to respond, e.g., the operations crew and control room support staff or the TSC decision makers. Although individual response proficiency may be assessed through this procedure, the performance may not be representative of an actual emergency where a team response is expected.

03.07 The use of a simulator is desirable during these drills, but not mandatory. The decision to use the simulator should be left to the licensee. However, it may be pointed out that the realism of the simulator would aid shift personnel in recognizing emergency conditions. Simulator use for key ERO personnel (who are not shift personnel) may not be appropriate, but use of facilities and emergency data links is appropriate.

03.08 The inspector should evaluate performance during the drill. The details of performance standards are found in the Emergency Plan, regulations and other published expectations for performance. However, expectations for performance include:

- a. Detection and classification should occur about 15 minutes after the symptoms which exceed the EAL are available to the

classifying official. Although not required by regulation, failure to meet this timeliness criterion may indicate deficiencies. The Emergency Preparedness Position on Timeliness of Classification of Emergency Conditions, "EPPOS 2," provides guidance to inspectors on expected timeliness of event declaration.

- b. Declaration of emergency conditions following earlier declarations should not be delayed until the earlier declaration is communicated to the offsite authorities. This is particularly true for fast-breaking event scenarios involving upgrading of the classification. The more severe emergency classification would have a greater and possibly more immediate response requirement and should not be delayed if its existence is known.
- c. Notifications of emergency declarations should be made within fifteen minutes of the time of the declaration. Information to be gathered for offsite notifications should be gathered quickly, and event declaration should not be delayed to allow more time for the gathering of this information. Information must be accurate.
- d. Offsite notifications should be accurate, in accordance with licensee procedures and should be approved by the appropriate level of emergency management.
- e. The guidance of NEI 99-02 (and EPPOS 2) would allow up to 15 minutes to declare a General Emergency once indication of the appropriate emergency action level is available. Another 15 minutes is allowed to begin notifications, which at the General Emergency must include a PAR. However, for PAR upgrades or changes, the new PAR should be developed within 15 minutes of data availability and notifications begun within 15 minutes of the PAR availability. These criteria are used for development of performance indicator data and none of them are stated as such in regulation. However, they do represent a reasonable expectation for performance.

03.09 Licensee prompting of drill participants is not a finding under the assessment process because it represents no risk significance in itself. However, prompting could negate the validity of the drill and may create the need for another drill evaluation for the involved ERO members.

03.10 Additional considerations are provided for review by the inspector:

- a. Scenarios should be constructed to stimulate and maximize performance opportunities. However, presenting a disjointed series of isolated tasks without full development of the event chronology may affect the validity of the drill.

- b. Multiple scenarios presented to the same crew or ERO team will help to eliminate solitary bad data points and more accurately characterize a particular crew's/team's performance.
- c. The objective is to develop scenarios that are realistic and sufficiently complex to evaluate performance ability.

03.11 The inspector(s) should become familiar with the scenario(s) upon arrival on site to understand how to evaluate performance. Review any changes made to the scenarios and tour the location(s) to be used for the drills to become familiar with equipment, displays, procedures and supplies to be used to perform the evaluated tasks.

03.12 Performance in the following areas should be observed and may provide valuable inspection information:

- a. procedure usability
- b. familiarity with procedures
- c. coordination of tasks (including command and control)
- d. the effect of communications (e.g., with management) on risk-significant task completion
- e. familiarity with equipment, displays, indications and calculational tools

03.13 Based on early results from the inspection, determine if additional drills need to be conducted or if the scope of the remaining drills needs to be modified.

03.14 The evaluation of licensee performance should be used to determine whether the identified extent of condition is adequate and provide inspection information to support the determinations listed in the inspection objectives.

82001.01-04            RESOURCE ESTIMATE

It is estimated that conduct of this attachment will take 80 hours.

END