

## Attachment 71114.03

INSPECTABLE AREA: Emergency Response Organization Augmentation

CORNERSTONES: Emergency Preparedness

INSPECTION BASES: The licensee system to augment the on-shift staff with Emergency Response Organization (ERO) members is an important process that supports the "ERO Readiness" key attribute of the EP Cornerstone. ERO augmentation is critical to implementing the Emergency Plan in a timely manner and Emergency Plan commitments in this area are required to meet Planning Standard 10 CFR 50.47(b)(2).

This inspectable area verifies aspects of the EP Cornerstone for which there are no indicators to measure performance.

LEVEL OF EFFORT: Initial implementation of this procedure requires verification of the augmentation system design.

### 71114.03-01 INSPECTION OBJECTIVE

01.01 To evaluate the adequacy of the ERO augmentation system.

### 71114.03-02 INSPECTION REQUIREMENTS

#### 02.01 Review Design of ERO Augmentation System

- a. Determine licensee commitments for ERO augmentation.
- b. Determine that the system, as designed, will support augmentation of the ERO in accordance with the facility activation goals.
- c. Review status of backup ERO augmentation practices.

#### 02.02 Review Of Augmentation System

- a. Review changes to the system and process.
- b. Review the results of augmentation tests.
- c. Review the effectiveness of corrective actions related to ERO augmentation.

### 71114.03-03 INSPECTION GUIDANCE

ERO augmentation tests that require personnel to report to their emergency response duty locations are not mandatory, but do provide a high level of assurance that activation goals can be met. Many sites have recognized the value of such “report-in” tests and have committed to perform them periodically. However, other combinations of testing and verification, if properly implemented, can provide a reasonable level of assurance. Commitments on this subject are contained in the licensee Emergency Plan and may vary between sites.

After initial inspection of augmentation system design, subsequent inspections need not repeat the entire review, but should focus on changes to system design, conduct of system drills and tests and the effectiveness of corrective actions.

### 03.01 Review Design Of ERO Augmentation System

- a. Review the site Emergency Plan to determine the approved commitment for activation of the ERO and associated facility activation goals.
- b. Review the design of the augmentation system and processes against facility activation goals and notification methods described in Emergency Plan. Process details may be found in emergency plan implementation procedures.

To be effective, augmentation systems must include a set of the following elements, sufficient to provide reasonable assurance that facility activation goals can be met:

- Current ERO duty roster that lists qualified personnel to fill positions required by the emergency plan.
- A mechanism to ensure a sufficient number of individuals are available to staff their assigned positions, (e.g., either sufficient depth of qualified individuals, normally considered to be 3 or more, or a formal roster assignment schedule).
- Verification that individuals can respond in a timely manner, (e.g., verification that ERO members live within an appropriate travel time from their duty locations or through an actual report-in drill where personnel report to their duty locations and are timed).
- A notification system for individual ERO members, (e.g., pagers, automated telephone systems, etc.).
- Training of ERO members in proper response to the notification system.
- Procedures for system activation.
- Personnel qualified to activate the system.
- Practices and/or procedures that are implemented if the normal augmentation system is not available.

- verification of augmentation system ability to ensure facility activation goals can be met, (e.g., unannounced off-hour report-in drills, unannounced off-hour “call-in” drills, actual events, etc.).

Determine whether the ERO augmentation system supports facility activation goals.

- c. Augmentation Backup System. Review any tests or implementations of the back-up augmentation system (or practice.) If no tests have been conducted, review the major elements of the back-up system to determine if they are current, (e.g., call-trees and call-out telephone lists). Determine by interview and/or procedure review, whether appropriate personnel know how to implement the back-up system.

### 03.02 Review Of Augmentation System

- a. Review changes made to the augmentation system hardware, software and procedures since the previous inspection and determine their impact on the effectiveness of the process. Determine whether the system, as modified, will provide reasonable assurance that Emergency Plan facility activation goals can be met. Hardware systems, (e.g., pagers,) may be vendor owned and operated. Changes to these systems may not be apparent, but the licensee is expected to ensure the systems are maintained in proper working order through the conduct of system tests or other surveillance activities. Determine whether system operation is verified by the licensee.
- b. Review the results of several augmentation system drills (call-in, report-in, etc.) Include augmentation results from all actual Emergency Plan activations that have occurred since the last inspection. Determine whether the results have been evaluated accurately and whether the conclusions reached are valid. Determine whether tests of the system adequately represent ERO augmentation, (e.g., call-in drills are supplemented with travel time verification and/or report-in drills are conducted periodically).
- c. A sample of program elements should be verified such as:
  - Review a sample of duty roster members to verify qualifications, including respirator qualifications where appropriate.
  - If ERO response relies on an access card or response operating instructions, verify that a sample of ERO members possess the required items.
  - Verify a sample of training records, if appropriate, for personnel expected to operate the call out system.
- d. For problems identified during drills or system tests, verify that the licensee has initiated corrective actions to assure a functional augmentation process and that the problem was entered into a licensee corrective action system for final corrective action.

Review a sample of the problems identified from augmentation system drills or system tests performed since the last inspection and assess the effectiveness of corrective actions. Review identified problems to identify trends and repeat failures by individuals, key ERO positions or equipment.

For repeat items, review the associated problem resolution actions to assess the adequacy of corrective actions. Consider the disposition of personnel performance problems as well as equipment failures. A repeat item does not necessarily indicate a failure of the corrective action process in itself. However, a trend of repetition of failures that bring into question the licensee's ability to augment the ERO and activate facilities within committed goals may require additional effort to determine the adequacy of the resolution process. This effort may require interviews with management or other individuals and further review of licensee problem resolution.

Review all licensee self-assessments of augmentation drills and testing since the last inspection. Determine the coverage and depth of the assessments, knowledge level of the reviewers, and whether the disposition of problems was appropriate. Determine whether identified problems were placed in the corrective action program and resolved.

#### 71114.03-04      RESOURCE ESTIMATE

| Direct inspection effort for this attachment is estimated to be, on average, between 6 hours  
| and 10 hours biennially, regardless of the number of reactor units at a site.

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