

NRC INSPECTION MANUAL

IOLB

INSPECTION PROCEDURE 82001

EVALUATION OF EMERGENCY PREPAREDNESS

PROGRAM APPLICABILITY: 2515

82001-01 INSPECTION OBJECTIVE

01.01 To supplement inspection efforts carried out under Inspection Procedures 95002 or 95003 with detailed requirements and guidance appropriate for evaluation of performance issues under the Emergency Preparedness (EP) Cornerstone.

01.02 To independently assess the extent of condition for performance issues under the EP Cornerstone.

01.03 To verify that the licensee has corrected problems associated with the degradation of the EP Cornerstone.

01.04 To provide inspection information to support the determination whether the EP program can meet the Cornerstone Performance Expectation and thereby the Objective, and whether the EP program can operate in the licensee response band.

01.05 The EP 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."

01.06 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."

82001-02 INSPECTION REQUIREMENTS

02.01 This procedure should be implemented to independently assess licensee conclusions regarding extent of condition of issues, when selected as a part of supplemental inspections using IP 95002, " Inspection For One Degraded Cornerstone or Any Three White Inputs in a Strategic Performance Area."

02.02 Inspection requirements are provided to address anticipated areas of licensee performance that may require

supplemental inspection. These address the key attributes within the EP Cornerstone as well as other areas. Inspection requirements are contained in the topic specific attachments to this procedure as follows:

- a. ERO Performance-Drills (Attachment 01)
- b. ERO Performance-Drills in Dose Assessment (Attachment 02)
- c. ERO Augmentation-Drills (Attachment 03)
- d. Facilities and Equipment (Attachment 04)
- e. Procedure Quality (Attachment 05)
- f. Remedial Exercises (Attachment 06)

02.03 Prepare an inspection plan identifying the elements appropriate. Include the resources required and the inspection schedule.

02.04 Review and verify, as necessary, elements of any relevant licensee cause analysis and determination of extent of condition. The inspection plan should encompass the extent of condition. However, the plan must allow for expansion of that scope should the extent of condition analysis prove incorrect.

02.05 The licensee EP program for correction of weaknesses and deficiencies will be inspected biennially using Baseline Inspection Procedure 71114, The licensee Problem Identification and Resolution Program will also be inspected annually under Baseline Inspection Procedure 71152. Consider the results of these inspections and any other relevant inspections in development of the inspection plan.

02.06 Discuss the inspection plan with appropriate management and the Resident Inspectors.

02.07 Notify the licensee of support necessary for the inspection. This may include: development of scenarios, personnel for performance in drills, access to equipment, access to facilities and access to the simulator.

02.08 Inspect the EP training program and its implementation to assess the extent of condition. This element may not be necessary if the cornerstone degradation problem is limited, e.g., to the Facilities and Equipment key attribute.

02.09 Determine if the licensee has adequately identified the extent of condition of the performance problem, if the licensee has corrected problems associated with cornerstone degradation.

02.10 Develop information to support the determination whether the EP program can meet the Cornerstone Performance Expectation and thereby the Objective, and develop inspection information to support the determination whether the EP program can operate in the licensee response band.

82001-03 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 This inspection is performed when the EP Cornerstone is degraded. The attachments segregate EP program elements into areas that cover the EP cornerstone key attributes and address anticipated problem areas. This organization differs from the past in that discipline specific topics that may have been addressed in a single inspection procedure are now segmented across the key attributes. For example, dose assessment is now addressed as follows:

- in ERO Performance (Attachment 2) for personnel performance issues,
- in Facilities and Equipment (Attachment 4) for hardware/software issues and
- in Procedure Quality (Attachment 5) for procedural issues.

This organization was chosen because it aligns with the Cornerstone analysis of EP. However, it provides the inspector the ability to focus on the problem, rather than review all elements of the program. For example, if dose assessment performance is the problem, there may be no need to examine the technical basis for the dose projection computer program. In this case, Attachment 2 would be performed, but Attachment 4 for radiological model adequacy may not be performed.

03.02 The attachments cover anticipated problem areas. Other areas may arise for which detailed inspection guidance has not been developed. In this case, it may be appropriate to use the general guidance of Inspection Procedure 95002 and/or 95003 to assess the condition of EP Cornerstone compliance.

03.03 The inspection requires the verification of extent of condition to assess the adequacy of corrective action plans. Generally, it would be expected that the licensee has performed an analysis of the Cornerstone degradation problem and that the extent of condition has been determined. This analysis should be reviewed as a part of inspection planning. It should be verified as a part of the inspection. However, inadequacies in the licensee analysis can affect the inspection scope, e.g., the number and category of participants in NRC observed performance drills may have been underestimated based on the licensee analysis of extent of condition.

03.04 ERO Performance-Drills, Attachment 1, is meant for inspection of performance problems associated with the areas generally covered by the drill/exercise performance (DEP) performance indicator (PI) and the associated risk significant planning standards (RSPS) 10 CFR 50.47(b)(4), (5) and (10). Other activities normally associated with the conduct of the RSPS activities may also be assessed as the drill is evaluated. ERO Performance-Drills in Dose Assessment, Attachment 2, is meant for inspection of performance problems associated with RSPS 10 CFR

50.47(b)(9). If performance problems encompass the scope of both attachments, the inspection effort and drills may be combined.

03.05 A review of the training program may be necessary to support the inspection objectives. This may include lesson plans, training policies, training schedules, records, instructional tapes, examinations, quizzes and attendance records. Interviews with training supervisors, instructors and students may be used to determine whether the training program is generally consistent with the guidance of NUREG-0654, Section II.O. Requirements for training may be found in 10 CFR 50.47(b)(13) and Section IV.F of 10 CFR Part 50, Appendix E. Guidance for EP training program inspection is suggested below:

- a. Review the training records of key (as defined in NEI 99-02) emergency response organization members and all new personnel, all Shift Supervisors and a selection of others. Verify that initial and refresher training has been completed IAW Plan commitments.
- b. Discuss training courses with various individuals (names selected from the training records) to verify whether the required training was provided, whether it was effective, and whether appropriate tests to determine the effectiveness of the training were administered. Those responsible for accident detection and classification may be interviewed to determine whether they received training on the licensee's emergency action level (EAL) procedures. The interviews need not gauge mastery of the training material if performance drills will be conducted for the trainee population being interviewed.
- c. The interview sample population may be focused on the tasks and positions associated with the Cornerstone degradation problem.

03.06 Inspection of some ERO Performance issues may be supplemented by observation of emergency response personnel in performance drills. Inspection requirements and guidance are provided in the attachments.

03.07 Licensee performance in drills and other licensee problem resolution efforts, as documented in the inspection report, will form the basis of the determination whether the licensee program can meet the Cornerstone Performance Expectation and operate in the licensee response band. The inspection may have to be repeated if it is apparent that licensee has not corrected the Cornerstone degradation problem sufficiently to demonstrate to NRC inspectors and management that the program can operate in the licensee response band.

03.08 In general, when this procedure is implemented the EP program is no longer operating in the licensee response band. This being the case, the methods of drill/exercise evaluation contained in the Baseline Inspection Procedure 71114 are not appropriate because EP program is not operating in the licensee response band. NRC inspectors will assess licensee performance directly, rather

than relying on licensee critiques and corrective action programs. Weaknesses and deficiencies identified by NRC should be examined to determine if the underlying program meets the regulatory requirements. Poor performance in observed drills should be documented in inspection reports and corrective actions tracked until closure or until the program is once again operating in the licensee response band.

03.09 The EP SDP for assessing the significance of inspection findings should be used for any findings identified in this inspection. Findings that are related to the problem identification and resolution program should be passed on to the team leader for the annual inspection or follow-up inspection(s) for that area.

82001-04 INSPECTION RESOURCES

It is expected that implementation of all attachments of this procedure would take 360 hours. However, it is not expected that all attachments would be implemented for a single site. Individual resource estimates are provided in the attachments.

82001-05 REFERENCES

Regulatory Guide 1.101, Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 3, August 1992.

NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980 (Microfiche Address: 01997/314 - 01998/71).

Baseline Inspection Procedure 71114 - "Reactor Safety - Emergency Preparedness"

Information Notice 83-28, "Criteria for Protective Action Recommendations for General Emergencies" (Microfiche Address: 18441/001-119).

EPA-400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," May, 1992.

NUMARC/NESP-007, Revision 2, "Methodology for Development of Emergency Action Levels," January 1992.

Information Notice 87-58, "Continuous Communications Following Emergency Notifications" (Microfiche Address: 43404/176-288).

EPPOS-2, "Emergency Preparedness Position (EPPOS) on Timeliness of Classification of Emergency Conditions," August 1, 1995.

NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," March 2000.

END