

Attachment 82001.03

ERO AUGMENTATION DRILL

82001.03-01 INSPECTION OBJECTIVES

01.01 To verify the extent of condition of ERO augmentation problems.

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.

82001.03-02 INSPECTION REQUIREMENTS

02.01 Implement Inspection Procedure 71114, "Reactor Safety - Emergency Preparedness," Attachment 3, "Emergency Response Organization Augmentation Testing." Implement the IP elements designated for the initial augmentation system design. If this inspection element has been recently performed, to the satisfaction of the inspector, it need not be performed again in its entirety.

02.02 Specify elements for an ERO augmentation drill scenario and discuss the scope and schedule with the licensee.

02.03 Determine through observation of an ERO Augmentation drill whether ERO members can augment the on shift staff in a timely manner.

02.04 Determine the effectiveness of licensee corrective actions in addressing ERO augmentation issues.

02.06 Develop inspection information in support of the determination of whether the licensee EP program can meet the EP Cornerstone Expectation.

02.07 Develop inspection information in support of the determination of whether the EP program can operate in the licensee response band.

82001.03-03 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 EP Cornerstone key attribute "ERO Readiness" is meant to encompass the ability of the licensee to activate ERO members and activate facilities in accordance with the Plan. This is

referred to as ERO augmentation in this procedure. The Baseline IP provides for a thorough review of the design of the license augmentation system. This key attribute was determined to be an important area with no applicable performance indicator. This being the case, the baseline IP may be used as part of this inspection.

03.02 The only element of the key attribute not examined by the baseline IP is an actual ERO augmentation drill. Demonstration of this element may be necessary to determine that the licensee program can meet augmentation goals and/or has determined the extent of the problem condition. Elements of the augmentation drill scenario would include:

- a. Activation of the augmentation system.
- b. Selection of an appropriate time of day during which the augmentation drill would provide a meaningful demonstration of licensee capability with a minimum of disruption to personnel. This requires an activation demonstration outside of normal working hours.
- c. The time of the ERO augmentation drill must be held confidential, although the plan to implement such a drill may be communicated to employees as this may be a significant departure from normal operations.
- d. It may be appropriate to notify local authorities of the augmentation drill so as not to unduly alarm officials.
- e. The activation should simulate emergency activation of the ERO, but yet notify personnel that it is a drill and not an actual emergency. This message would have to be crafted in a manner that would request personnel to respond as if it were an actual emergency.
- f. It may be appropriate to include the actual set up and activation of facilities as part of the augmentation drill scenario.

03.03 The inspector should understand the duty roster, the minimum ERO staffing necessary to activate centers to meet Plan commitments and the reference starting time (e.g., event declaration or ERO notification.) Conduct of the drill requires NRC inspection personnel to be stationed at the emergency response facilities to determine if responding ERO members can meet augmentation goals.

03.04 A functional center may not require all members to be present. Some licensee Plans identify the minimum staff/positions necessary for a functional center. In the absence of such a pre-determination, the guidance of NUREG 0654 Table B-1 may be used.

03.05 Requirements for activation of the emergency organization may be found in 10 CFR Part 50, Appendix E, Section IV.C. The

licensee's implementing procedures or other relevant documentation should be reviewed to determine expectations for successful activation. It may be useful to identify action levels for the activation of the augmentation system, emergency response personnel expected to activate, any offsite authorities notified as part of the augmentation and corporate support personnel expected to activate.

03.06 Development of inspection information in support of the determination of whether the program can meet the Cornerstone Performance Expectation should be based on the success of the augmentation drill. Inspectors may exercise judgement regarding mitigating circumstances that may have detracted from response, but the expectation is for sufficient ERO staff to arrive at centers in a manner that would support timely activation. If the centers are not to be actually activated, then a time period for setup and activation may be considered in the determination.

82001.03-04 RESOURCE ESTIMATE

It is estimated that conduct of this Attachment will take 40 hours.

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