

## Attachment 82001.05

### PROCEDURE QUALITY

#### 82001.05-01 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.

#### 820015-02 INSPECTION REQUIREMENTS

02.01 Implement Inspection Procedure 71114, "Reactor Safety - Emergency Preparedness," Attachment 4, "Emergency Action Level and Emergency Plan Changes," IP elements designated for emergency action level (EAL) changes. If this inspection element has been recently performed, to the satisfaction of the inspector, it need not be performed again in its entirety. If the EAL procedure in its entirety is in need of verification, review all EALs against the approved guidance.

02.02 Review notification procedures for adequacy.

02.03 Review PAR development procedures for adequacy.

02.04 Review other Emergency Plan Implementing Procedures for adequacy.

02.05 Determine the effectiveness of licensee corrective actions in addressing procedure quality issues.

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

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

#### 82001.05-03 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 Requirements for EALs may be found in 10 CFR 50.47(b)(4) and 10 CFR Part 50, Appendix E, Section IV.B. Some licensees will have event-based EALs. Some licensees will have symptom-based EALs that often are based on the status of fission product barriers. Some licensees will have EALs based on the status of critical safety functions and their relationship to the status of fission product barriers. In all cases it should be possible to compare EAL schemes to the example initiating conditions in Appendix 1 of NUREG-0654 or NUMARC/NESP-007, Revision 2, and this comparison should result in equivalent classifications. The licensee should indicate which methodology has been utilized. Classification procedures, tables and EALs should be essentially identical to those last submitted to the NRC for approval with only minor non-substantive revisions. Several of which may relate to different classification levels. The inspector may verify that the licensee's EALs are consistent in range, units, and conversion factors with appropriate control room instrumentation and that the decisional aids used for event classification in the control room, the Technical Support Center (TSC), and the Emergency Operations Facility (EOF) are readily available and consistent. The inspector should be alert for any management directives that would delay classification until management notifications or other actions not immediately necessary for public health and safety are performed.

03.02 The inspector should determine whether the licensee has adequate procedures to direct the user to notify offsite authorities accurately and promptly of emergency conditions. The content of initial and follow-up emergency messages to offsite authorities should be verified as adequate with regard to data and information requirements. The inspector should review the licensee's notification procedures for consistency with the emergency classification and action level scheme. One important aspect of the notification procedures is the existence in the procedures of the expectation to promptly (within 15 minutes) initiate notifications after declaring an emergency (see 10 CFR Part 50, Appendix E, Section IV.D.3). Verify that usable and current procedures exist in the control room and licensee's emergency response facilities. Verify that procedures contain provisions for message verification.

03.03 Initial and follow-up emergency messages should be consistent with the guidance of Part II, Sections E.3 and E.4, of NUREG-0654. As a minimum, messages should contain the following data:

- a. classification of the emergency
- b. emergency action level upon which the emergency declaration is based
- c. a brief description of the plant conditions supporting the classification
- d. the status of any offsite releases of radioactive material
- e. meteorological conditions at the release point
- f. offsite protective action recommendations or whether no such recommendations are required

03.04 The organizational elements, responsibilities, and authorities in the emergency plan implementing procedures (EPIPs) for protective action recommendations should be compared with those in the emergency plan. The emergency plan implementing procedures should clearly specify a methodology that enables the licensee to make protective action recommendations appropriate for the particular plant conditions (see NUREG-0654, Appendix 1, and NUREG-0654, Supplement 3, EPA-400, and IE Information Notice 83-28, dated May 4, 1983). Verify the licensee's procedures for making offsite protective action recommendations are able to be used by the on-shift crew with the information available to them in the control room. Verify that the licensee's procedures provide for the generation of protective action recommendations on an ad-hoc basis for distances beyond the ten-mile plume exposure emergency planning zone. PAR's should not deviate substantially from those contained in Federal guidance (NUREG-0654, Supplement 3 and EPA-400) unless the licensee's agreement with the offsite agencies specifies such a deviation. In such cases, review the licensee's basis for its PAR policy.

03.05 Determine whether the licensee has adequate procedures to direct the user to develop source term estimates and projections of offsite dose consequences for offsite releases of radioactive material under accident conditions. The licensee should have adequate procedures to estimate the source term from liquid and airborne releases (radioactive inventory available for release and the release pathway), under all anticipated accident conditions; based on reactor systems status, core conditions, and containment integrity.

03.06 Dose assessment procedures should be reviewed to assure that they are consistent with the EPA "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents." Consistent with the guidance in the EPA Manual, the dose assessment procedures and method should account for thyroid dose commitment and the committed effective dose equivalent from inhalation and the external effective dose equivalent from plume exposure and exposure to the ground deposition of radionuclides. Procedures should be available to verify that feedback from field monitoring teams can be incorporated into the dose projection.

03.07 The evaluation of licensee EPIPs 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.

82001.05-04 RESOURCE ESTIMATE

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

END

