

November 4, 1999

MEMORANDUM TO: Thomas H. Essig, Chief
Emergency Preparedness and
Health Physics Section
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

FROM: Randolph L. Sullivan, Emergency Preparedness Specialist Original signed by:
Emergency Preparedness and
Health Physics Section
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF PUBLIC MEETING WITH NUCLEAR INDUSTRY
REPRESENTATIVES REGARDING PERFORMANCE INDICATORS
FOR EMERGENCY PREPAREDNESS PROGRAMS

On October 26, 1999, representatives of various utilities and the Nuclear Energy Institute (NEI) met with representatives of the Nuclear Regulatory Commission (NRC) at NEI offices in Washington, DC. Attachment 1 provides a list of attendees.

The purpose of the meeting was to provide NRC input and stakeholder comments on the clarification of the structure and relationship of performance indicators (PI's) in limited use for the emergency preparedness cornerstone. The relationship of the Drill Exercise Performance (DEP) PI and the Emergency Response Organization Participation (ERO) PI was discussed.

NEI requested that NRC allow flexibility for industry in the identification of opportunities for demonstration of the DEP PI and yet allow credit to be taken for the ERO PI. NRC presented a description of the intended linkage between the PI's and the reasons for the linkage. Attachment 2 provides this description. NRC and industry representatives discussed mechanisms to accomplish NRC oversight requirements while providing industry flexibility.

Wording changes were agreed to that will allow NRC an appropriate measurement of licensee performance and yet allow licensees the flexibility needed to accomplish training goals. A draft revision is provided as Attachment 3.

Attachments: As stated

cc w/atts: See next page

CONTACT: Randolph L. Sullivan IOLB/NRR
415-1123
Project No. 689

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NAME	RSullivan	TEssig		
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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Emergency Preparedness and
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CONTACT: Randolph L. Sullivan IOLB/NRR
415-1123

Project No. 689

**cc: Mr. Ralph Beedle
Senior Vice President
and Chief Nuclear Officer
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708**

**Ms. Lynnette Hendricks, Director
Plant Support
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708**

**Mr. Alex Marion, Director
Programs
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708**

**Mr. Charles B. Brinkman, Director
Washington Operations
ABB-Combustion Engineering, Inc.
12300 Twinbrook Parkway, Suite 330
Rockville, Maryland 20852**

**Mr. David Modeen, Director
Engineering
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708**

**Mr. Anthony Pietrangelo, Director
Licensing
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708**

**Mr. H. A. Sepp, Manager
Regulatory and Licensing Engineering
Westinghouse Electric Corporation
P.O. Box 355
Pittsburgh, Pennsylvania 15230**

**Mr. Jim Davis, Director
Operations
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708**

**Emergency Preparedness PI Linkage Meeting
10/26/99**

List of Attendees

<u>Name</u>	<u>Organization</u>
A. Nelson	NEI
R. Sullivan	NRC/NRR
D. Hickman	NRC/NRR
T. Essig	NRC/NRR
S. Sanders	NRC/NRR
S. McCain	CP&L
C. Simmons	OPPD
N. Avrakotos	NYP&A
B. McBride	Dominion
B. Renz	Dominion
M. Azzaro	PSE&G
R. Kitts	TVA
W. Lee	Southern Nuclear

Emergency Preparedness Cornerstone Basis for linkage of the DEP and ERO PI's

The following paper is meant to provide information only. It is an explanation of the need for linkage between the DEP and ERO PI's under the EP Cornerstone. The inspection program in use during the pilot program is based on this linkage and its design would change if the linkage is removed or the concerns addressed by the linkage were not addressed.

DEP PI

The PI measures performance of key ERO members in the conduct of the most risk-significant facets of EP, classification, notification and PAR development. The threshold of the green band is a 90% success rate in these activities.

ERO Participation

The PI measures the participation of key ERO members in drills (or other proficiency enhancing activities, referred to as drills herein.) The threshold of the green band is 80% participation.

Linkage

Participation of a key ERO member in a drill is only credited when the drill contributes to the DEP statistics, (where the key ERO members duties include classification, notification or PAR, e.g., the OSC Manager's drill does not contribute to DEP.)

History

The clarifying note covering this linkage was communicated to industry and NEI as 99-02, Rev B was being finalized. The written revision was sent to NEI, some few hours too late for incorporation in Rev. B. NRC was assured that the note would be e-mailed to industry to ensure understanding of the technical basis behind the PI set. The note was not sent out, but was included in Rev C of 99-02. Many site EP personnel understood this linkage and it is addressed in the Q&A's posted on the NEI web page.

Benefit-NRC

NRC gets data on EP related performance across 8 quarters from a broad range of personnel (i.e. key ERO members.) The PI's provide assurance that 80% of key ERO members perform at a 90% success rate in the most risk significant aspects of EP.

The PI data, linked as described, allows NRC to change the inspection program in a fundamental manner. Since data is provided that reflects performance broadly across the span of EP program elements, the licensee response band can be structured to include many elements of the old inspection program. Although there are several important elements of EP that are not covered by the PI's (e.g., worker protection, assessment, facilities, equipment, training, EIPs, management, command and control, OSC operations, TSC operations, interface with State, etc.) the licensee program that is in the green band can be expected to identify and correct problems in these areas. The licensee problem identification and resolution program becomes the focus of inspection, rather than direct inspection of these elements.

Benefit-Licensee

EP elements that were previously inspected, that are now in the licensee response band include:

- Performance of all elements (OSC, TSC, EOF, CR, FMT's, JIC, Chemistry, HP, etc.) of the ERO during the biennial exercise, (the critique is inspected rather than the performance, there are no exercise weaknesses under the new program),
- Training (including interviews of ERO staff),
- Facilities and equipment,
- Surveillance programs,
- Organizational management,
- EIPs,
- Communications gear and
- Offsite interface.

Concerns-NRC

1. The DEP PI by itself is flawed. The minimum of opportunities (actual events, off year and biennial exercise) is too small to effectively measure the performance of the ERO. There is no requirement that different ERO members contribute to the statistics. It would be possible for a site to offer less than 10 opportunities per year, all performed by the same ERO members. Properly coached for the pre-specified opportunities, this limited cadre of ERO members could exceed the green band threshold without providing meaningful indication of performance.
2. The drills used for the ERO PI could lack significance if the statistics are not included in DEP. There is no measure of proficiency-enhancing, other than judgement. Without formal assessment of the portion of the drill involving the DEP elements there is no assurance that the ERO is proficient (given the changes in the inspection program.)
3. Internal stake holders question whether the data provided by the PI set is sufficient to allow the licensee response band to be expanded as noted above, e.g., the link between OSC performance and DEP is not direct and relies on the efficacy of the licensee PI&R program.

Concerns-Industry

1. Formal assessment detracts from ability to coach during drills.

Yes, in some measure, but the whole drill need not be formally assessed. Only the portion of the evolution during which a classification (or notification, etc.) is made is assessed. It is only assessed for timely and accurate completion. Coaching could progress before the classification, directly afterwards, or during if the opportunity is going to not be successful anyway.

2. First time participants would add to the statistics.

It would be hoped that first time participants would not be assessed without a training and experience basis for their appointment as a key ERO member. While practice is needed it should be in a non-assessed format. There are several solutions to this problem, such as:

- identifying the later classification opportunities in a drill as contributing to DEP,
- allowing the earlier ones to be coached,
- assigning a mentor to assist, the performance of the team is then assessed,
- not using the evolution for ERO statistics as the green band threshold allows for 80% participation.

ERO/DEP Linkage ERO Clarifying Notes

The following clarifying note will be placed in NEI-99-02 Section 2.4 under the ERO PI description.

When the functions of key ERO members include classification, notification, and PAR opportunities, the success rate of these opportunities must contribute to Drill/Exercise Performance (DEP) statistics for participation of those key ERO members to contribute to ERO participation. However, the licensee may designate drills as not contributing to DEP and, if the drill provides proficiency enhancing evolutions as described above, those key ERO members whose functions do not involve classification, notification, or PARs may be given credit for ERO Drill Participation.

Additionally the licensee may designate elements of the drills not contributing to DEP (e.g., classifications will not contribute but notifications will contribute to DEP). In this case, the participation of all key ERO members, except those associated with non-contributing elements, may contribute to ERO Drill Participation. The licensee must document such designations in advance of drill performance and make these records available for NRC inspection.

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