
INSPECTION PROCEDURE 71114.07

EXERCISE EVALUATION - HOSTILE ACTION (HA) EVENT

PROGRAM APPLICABILITY: 2515

71114.07-01 INSPECTION OBJECTIVE

To evaluate the adequacy of the licensee's ability to; implement mitigative measures in response to a simulated attack on site that is sufficient to create the loss of a large area of the site due to physical damage and/or unknown security state; coordinate Security, Operations, ERO and ORO required actions to successfully respond to and mitigate plant damage before Local Law Enforcement Agencies (LLEA) are able to declared the site secure; and its capability to assess performance via a formal critique process in order to identify and correct weaknesses.

71114.07-02 INSPECTION REQUIREMENTS

02.01 Prepare for the HA event biennial exercise inspection. A HA event exercise is required for each licensee site at least once in the exercise cycle, including each licensee at a co-located site.

02.02 Review corrective actions identified as a result of the previous drill and exercise critiques, beginning with the previous biennial exercise and the previous HA event exercise critique to identify any unique hostile action event corrective actions. Develop a list of performance areas to be observed during the exercise. If applicable, 10 CFR 50.54(hh)(1) & (2) scenario activities should be observed and evaluated. At a minimum, all previously identified risk-significant planning standard (RSPS) corrective actions shall be reviewed and noted for observation during the exercise.

02.03 Perform independent observations of licensee's performance in classification, notification, PAR development, onsite protective actions and dose assessment activities and as many other aspects of performance as resources allow, in the HA event environment. Observe the licensee's coordination of Security, Operations, ERO and ORO actions. In the case of co-located licensees, verify licensee compliance with the requirements of 10 CFR 50, Appendix E, Paragraph IV.F.2.c concerning the continuance of certain activities in the period between biennial exercises.

02.04 If the exercise scenario contains demonstration of strategies, procedures, and/or guidance developed under § 50.54(hh)(2) observe and evaluate the implementation of these activities.

02.05 Note any weaknesses observed by the inspection team not appropriately identified by the licensee's formal critique and entered into the corrective action program.

02.06 Identify recurring weaknesses noted in similar activities from previous evaluated exercise(s) for corrective action effectiveness.

02.07 Identify any weaknesses that may reveal a failure to comply with a regulatory requirement.

02.08 Determine whether the licensee has demonstrated reasonable assurance of its capability to effectively implement the emergency plan in a HA event environment and adequately protect public health and safety.

02.09 Represent the NRC at the Federal Emergency Management Agency (FEMA) public meeting as negotiated.

02.10 Review the proposed offsite exercise deficiencies (if any) provided by FEMA and inform the licensee of those deficiencies.

71114.07-03 INSPECTION GUIDANCE

The focus of this inspection is to evaluate the adequacy of the licensee's ability to: conduct a biennial exercise in a HA event environment, assess performance via a formal critique process and identify and correct weaknesses. Emphasis should be placed on licensee assessment of classification, notification, PAR development, dose assessment activities, ability to adequately protect employees and emergency workers, and to coordinate with offsite officials located at the Incident Command Post in the HA event environment. Inspectors should evaluate as many other aspects of performance and the critique as resources allow. The following section provides methods and examples of how the inspection requirements of this procedure could be completed. Use of the following guidance is at the discretion of the inspector.

03.01 Prepare for the Biennial Exercise Inspection.

- a. The licensee is required to submit its biennial exercise scenario for prior NRC review and verification. A review of the submitted scenario is performed under Attachment 71114.08, "Scenario Evaluation."
- b. Review the scenario for a summary understanding.
- c. Ensure there is a consistent pre-exercise understanding of the expected decisions for DEP PI opportunities and extent of exercise demonstration/simulation between the inspection team and the licensee.
- d. Develop a plan to deploy inspection resources in a manner to observe classification, notification, PAR development and dose assessment activities, a review DEP PI failures and adverse trends will help to inform what specific areas should be observed.

- e. Consider the prioritization guidance provided in Attachment 1 “Prioritization of Additional Areas for Inspection,” to develop a plan to deploy inspection resources to observe other activities as practical. Selection of other areas for inspection should be based on resource availability, past history, efforts to correct weaknesses and/or logistical limitations.
- f. Review the Emergency Plan and Emergency Plan Implementing Procedures (EPIPs) that provide instructions for HA event environment classification, notification, PAR development and dose assessment activities, and other functional areas relevant to the exercise. Develop an understanding of the criteria for timely and accurate completion of these activities based on EPIPs, the scenario, NSIR/DPR-ISG-01 §IV.H, “Interim Staff Guidance: Emergency Planning for Nuclear Power Plants,” and NEI 99-02, Regulatory Assessment Performance Indicator Guideline.” Ensure that the Plan and EPIPs contain criteria concerning protective actions for non-essential onsite personnel, including evacuation for Site Area Emergencies and General Emergencies. If the exercise scenario includes an aircraft attack review Fire Protection Triennial IP 71111.05T for additional guidance on expected licensee capabilities.
- g. Schedule a briefing of the inspection team by licensee personnel before the exercise to discuss exercise content/conduct and any late scenario revisions. This is an opportunity to ask questions regarding the scenario, licensee expectations for judging timely and accurate DEP PI opportunities, logistics, mentor arrangements, shift changes, etc.
- h. Oversight of co-located licensees introduces unique inspection requirements. See Section 03.03 for additional details.

03.02 Review previously identified weaknesses and corrective actions from licensee drill/exercise critiques, QA audits, Drill and Exercise performance indicator, and NRC exercise inspection reports since the last biennial exercise. Request HAB event specific corrective action program issues from the last HAB event exercise (i.e. communication between the control room and the incident command post did not work consistently) for review and for potential use in identifying specific areas to observe. If the exercise scenario includes a demonstration of, or the exercise inspection week includes an out of sequence event demonstrating, 10 CFR 50.54(hh)(1) & (2) strategies, these events, to the extent possible, should be observed and evaluated. Identify trends, repeat items, individual DEP PI inputs below the quarterly reported value and items that could represent a failure to comply with a regulatory requirement. Select a sample of ERO performance and equipment-related weaknesses resolved, for inspection during the biennial exercise. Inspection resources should be allocated to the risk-significant areas first, but if there are important weaknesses in other areas, an attempt should be made to allocate resources in a manner that will allow inspection of those areas also. Use the prioritization guidance provided in Attachment 1 “Prioritization of Additional Areas for Inspection,” to identify other areas for inspection.

03.03 Perform Independent Observations of Licensee Performance.

- a. Perform an evaluation of the licensee’s planned range of protective actions to protect onsite personnel during a hostile action and the procedural guidance for onsite protective action decision making. The review should include the following elements:

1. Do onsite protective actions clearly distinguish between actions taken for a credible threat versus active hostile action?
 2. Does the licensee have a decision making tool (e.g., procedure, logic charts, etc.) to aid the shift manager in rapidly determining the optimum protective action for onsite personnel during a hostile action?
 3. Does the range of protective actions include provisions for the following:
 - Evacuation of onsite personnel from target buildings?
 - Site evacuation by opening security gates while continuing to defend the gates?
 - Dispersal of licensed operators?
 - Sheltering of personnel in structures away from potential site targets?
 - Arrangements for accounting for personnel after the attack?
 - Is specific equipment, material, buildings or areas, readily available and in adequate quantity and condition to support the expected usage.
 - Is access to shelter structures readily available 24/7?
- b. Observe licensee performance in classification, notification, PAR development, dose assessment activities, prompt dispatch of liaisons knowledgeable of plant operations, radiation protection, and security aspects to the ICP and the other areas selected. Identify apparent performance weakness (es). As resources permit the following elements are also of interest:
- Demonstration of the capabilities of site security to interface with the EOF, OSC, TSC and Control Room.
 - Support of and interface with an Incident Command Post (ICP) to facilitate the transfer of plant information and coordination of response activities.
 - The use of the alternative emergency response facilities for activation of the ERO.
 - Actions taken to shelter personnel from armed attack or aircraft attack
 - Conduct of operations and repair activities during site conditions that prevent normal access due to fire, locked doors or security measures such as areas that have not yet been secured.
 - Rescue of and medical attention for significant numbers of personnel.

- Prioritization and urgency (e.g. restore offsite power within 4 hours) of efforts to protect plant equipment or to secure access to plant areas for repairs.
 - Response coordination and site access established between on-shift personnel and ORO first responders.
 - Coordination and decision-making actions necessary for prompt mobilization or relocation of the ERO in a HA event environment.
 - Protecting a minimum contingent of operations and maintenance personnel for recovery
- c. Gather copies of completed forms and checklists that support or document classification, notification and PAR development activities and the other areas selected for inspection.
- d. Inspector-identified weaknesses must be held confidential until after the formal licensee critique. Ensure the licensee critique conclusions are complete, including management review, before discussing inspector observations and conclusions.
1. A weakness is defined as a level of ERO performance demonstrated during an exercise, drill, or training (that provide performance opportunities to develop, maintain, or demonstrate key skills) that would preclude effective implementation of the Plan (i.e., loss of a planning standard function) if the weakness were to occur during an actual emergency.
 2. A mistake or a miss-step by ERO members that only detracts from the overall ERO performance should generally not be treated as a weakness. Mistakes are likely to happen in the course of an exercise and many are corrected by the ERO (e.g., peer checking), which should be viewed as an organizational strength. Failure to identify these mistakes as weaknesses in the critique is generally not an issue of concern.
 3. Classifications, PARs, and notifications could be accurate and timely (i.e., DEP PI opportunity successes) and there still be a weakness (e.g., a correct classification based on misinformation, a correct PAR based on an incorrect dose assessment). Such weaknesses need to be identified and corrected since, under different circumstances, they could affect functions necessary for protecting the health and safety of the public.
 4. Prompting of exercise participants is not a finding under the assessment process because it represents no risk significance in itself. However, prompting related to a DEP PI opportunity is basis for failing a DEP PI opportunity and should be documented when observed. It is also possible that extensive prompting throughout an exercise could question the EROs ability to satisfactory execute the Plan. This determination would be made based on the extent of the prompting and involve Regional management. Failure of the critique to identify

prompting may be a finding depending on the nature of the Plan commitments for conduct of drills and exercises and the extent of the prompting.

- e. Although observations of prompting have no risk significance in of themselves, prompting could prevent the identification and correction of ERO performance weaknesses and could negate the validity of a DEP PI opportunity. Accordingly, the failure of the licensee to identify the weaknesses, which would have been identified if not for the prompting, may be a performance deficiency that should be evaluated as a failure to comply and assessed for significance. Prompting may also be a basis for failing a DEP PI opportunity.
 1. Prompting is an action by a controller or evaluator that prevents an accurate evaluation of a player's performance in an evaluated exercise by masking a performance weakness that would have otherwise become apparent had the prompting not occurred. This should not be confused with an exercise inject, which is a communication between a controller and a player that provides information regarding simulated conditions, analysis results, instrument readings, etc., all of which would reasonably be expected to be self-revealing or discoverable, during an actual event. Injects are not an issue of concern unless they prevent the identification and correction of ERO performance weaknesses.
 2. It is also possible that prompting throughout an exercise could be so extensive as to bring into question whether the exercise was a satisfactory test of the Plan. This determination would be made in consultation with Regional management, and would be based on the extent of the prompting and the risk-significance of the associated weaknesses.
 3. Even if identified in the CRITIQUE, prompting during a DEP PI opportunity should be considered a failure. (See ROP FAQ No. 405 dated July 21, 2005.)
- f. Emergency response facilities and equipment, including alternate and/or backup facilities, to the extent feasible, should be evaluated for readiness, while observing their use during the exercise, such as, but not limited to:
 1. Would the alternative facility (or facilities) be assessable if the site was under threat or experiencing hostile action?
 2. Does the alternative facility (or facilities) provide a staging area for augmentation of emergency response staff?
 3. Does the alternative facility (or facilities) collectively have the following characteristics:
 - The capability for communication with the emergency operations facility, control room, and plant security.
 - The capability to perform offsite notifications, and

- The capability for engineering assessment activities, including damage control team planning and preparation for use when onsite emergency facilities cannot be safely accessed during hostile action
- g. The activation times for emergency response facilities should be noted and evaluated against Plan commitments.
- h. Evaluation of biennial exercises at sites with co-located licensees introduces additional inspection requirements. These requirements are found in 10 CFR 50, Appendix E, Paragraph IV.F.2.c and generally involve drills, training, and activities/interactions with offsite authorities (Regulatory Guide 1.101, "Emergency Response Planning and Preparedness for Nuclear Power Reactors," Revision 5, June, 2005, provides additional guidance). The inspection plan should provide for the verification that these activities are conducted, properly observed, and where appropriate, critiqued by licensee personnel. It should be noted that NRC inspectors do not evaluate offsite agency performance, but will rather focus on the interface of licensee personnel with offsite agencies. However, any observed offsite performance weaknesses that impact the licensee's ability to implement the onsite Emergency Plan should be shared with the FEMA evaluation team for further assessment.

03.04 If the exercise contains the demonstration of strategies, procedures, and/or guidance developed under § 50.54(hh)(2) observe and evaluate the licensee's implementation of their E-plan commitments.

Note The inspector is not expected to evaluate of the adequacy or regulatory compliance of the licensee's actions and/or procedures, only the licensee's implementation of their E-plan commitment(s) for the 50.54(hh)(2) strategy requirement.

03.05 Evaluate Licensee's Identification of Weaknesses.

- a. The inspectors should familiarize themselves with the licensee's critique process and discuss expectations with the licensee. This discussion should include the critique scheduling, content, participation, and when the critique process is complete. The NRC considers the critique process complete when all draft conclusions related to the identified weaknesses have been presented to licensee senior management, and management questions or comments have been documented. The licensee should understand that the critique should not be delayed in order to address every minor problem identified.
- b. Weaknesses associated with RSPS should be given the highest priority in the critique. However, all weaknesses that could preclude effective implementation of the Plan in an actual emergency (e.g., a failure to implement), are to be identified and corrected.
- c. Licensees perform critiques in many different ways and inspectors should be flexible in accepting different methods of weakness identification.
 - 1. The critical feature of a critique is all weaknesses are identified and entered into a corrective action system with the appropriate priority, regardless of whether the weakness was verbalized at a critique meeting and in a manner that will allow

NRC review of the resolution in the future (i.e., during subsequent biennial exercises).

2. For the critique to be considered acceptable, the process must give the inspector adequate evidence that all weaknesses have been entered into a corrective action system. If the inspector does not have adequate evidence that a weakness has or will be identified and documented in the corrective action system, the critique is not acceptable and a critique problem exists.
- d. The inspectors should conduct a pre-critique briefing with the EP staff/management prior to the formal critique to discuss any non-exercise-related inspection observations/findings, and to obtain the licensee's preliminary critique of the exercise results.
1. This meeting will aid the inspector in preparation for the formal exit meeting with licensee senior management which is typically conducted following the formal critique.
 2. The inspectors cannot share the NRC exercise observations at this meeting, even if they are consistent with the licensee's preliminary critique.
 3. The inspectors should stress at this meeting that, for inspection purposes, while the formal critique should focus on weaknesses associated with the RSPS, all observed weaknesses must be entered into the corrective action system. The inspector should discuss any change in the licensee's preliminary critique before the formal critique. The balance of the critique presentation is determined by the licensee's process.
- e. Determine if the licensee critique identified the weaknesses observed by the inspection team.
1. Any inspector identified weaknesses not captured by the licensee may represent a critique problem, or the inspectors may have misinterpreted exercise participants' activities, or failed to observe a portion of those activities. It may be appropriate to discuss such problems with cognizant licensee staff and management before the formal critique.
 2. Licensee critique problems shall be documented and assessed for significance. Failures of the licensee evaluation should be addressed during the NRC exit meeting.
 3. The licensee will evaluate numerous evaluator observations, identify which observations rise to the level of a weakness, and prioritize resources to correct them. Ensure a complete understanding of the logic underlying the licensee's disposition before identifying any as a critique problem. If an evaluator-identified weakness is improperly dispositioned and not entered into the corrective action system, a critique problem exists, since the licensee is required to enter identified weaknesses into a corrective action system.

03.06 Identify Recurring Weaknesses.

- a. Using previous drill and exercise reports or assessments beginning with the previous biennial exercise, determine if weaknesses identified by the inspectors and/or the licensee, represent a trend, or a repeat (i.e., recurring, with the same or similar cause) weakness.
 1. Determine if the licensee identified the trend or repeat weakness and entered it into the corrective action system.
 2. Identification of a failure to correct a drill or exercise weakness requires a detailed review of the weakness and the associated corrective actions. A single repeat of a weakness should not automatically be deemed a failure of the corrective action system. Conversely, a single success in a drill or exercise (e.g., by one well-drilled team) should not necessarily be considered a demonstration of problem resolution.
- b. When a previously identified weakness recurs in a subsequent drill or exercise, the inspector should perform an assessment of the effectiveness of the prior corrective actions based on a complete history of the issue. The intent of this assessment is to see if there is a pattern of recurring performance problems in similar activities in order to identify ineffective corrective actions. To obtain a reasonably complete picture of the current problem, the inspector should:
 1. Review specific corrective actions identified for the previous weakness.
 2. Consider the status of the DEP PI, as well as the status of the individual DEP PI inputs.
 3. Review corrective action, self-assessment, and inspection records for the inspection cycle with emphasis on similar performance deficiencies.
 4. Review the associated root cause and extent of condition analysis.
 5. Verify completion of associated corrective actions.
 6. Look for similar occurrences during responses to prior actual events, drills, exercises, and training evolutions.

03.07 Identify Failures to Comply with Regulatory Requirements.

- a. During an exercise (or actual event) a failure to implement a planning standard does not necessarily indicate a failure to meet the planning standard. However, serious failures may indicate a programmatic problem worthy of additional review. Performance problems may reflect a deterioration of the EP program element to a point that the applicable planning standard is no longer met.
- b. The licensee's performance during an exercise may uncover issues of concern regarding the effectiveness and adequacy of the program elements that comprise the

licensee's emergency plan. For example, the ERO may be unable to classify a particular emergency because the EAL scheme threshold was greater than the monitor is capable of displaying.

- c. Weaknesses are defined in the context of ERO performance during an exercise. A program element concern related to the effectiveness and adequacy of the Plan, or its implementing procedures¹, observed during an exercise is not an exercise weakness. Instead this issue should be evaluated as an apparent failure to comply with the associated 10 CFR 50.47(b) planning standards and Appendix E requirements and assessed for significance in accordance with the EP SDP.
 - 1. Review the history of identified weaknesses to obtain relevant information.
 - 2. Determine immediately, if possible, if the program no longer meets the applicable planning standard. If this cannot be accomplished immediately, confer with regional management for direction.
 - 3. The concern and the results of the additional review should be communicated to the licensee, documented and assessed for significance through the EP SDP
- d. If either the Plan or procedures are inadequate, it is not a drill/exercise critique issue, it is a failure to comply with a planning standard and the significance planning standard should then be assessed for significance through the EP SDP.

03.08 Evaluate Exercise against EP Cornerstone Performance Expectation.

- a. The baseline inspection program is predicated on the EP Cornerstone Performance Expectation. The inspectors should determine that the conduct of the exercise supports the finding that the EP program meets the Performance Expectation: "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."
- b. Section IV.F.2.f of Appendix E to 10 CFR 50, provides the requirements for a remedial exercise, required if the Emergency Plan is not satisfactorily tested during the biennial exercise such that the NRC cannot find reasonable assurance that adequate protective measures can be taken in the event of a radiological emergency. Not invoking this regulation implies that the inspection team came to the conclusion that the Plan was satisfactorily tested. If the exercise was not a satisfactory test of the Plan or problems have been identified which potentially could result in a remedial exercise, the inspectors will obtain management review, and any subsequent action would not be decided by the inspection team alone.

03.09 Represent the NRC at the FEMA Public Meeting.

¹ The E-plan contains the licensee's commitments to NRC regulations. The implementing procedures are the licensee's methods of implementing those commitments and may be used to judge effective, timely, and accurate implementation.

Note For licensee locations that have multiple FEMA regions involved in the exercise evaluation, the inspector will need to determine which FEMA Public Meeting(s) can be attended based on inspection resources, schedules, etc.

- a. The lead inspector, or alternate, should represent NRC at the FEMA public meeting. A statement should be made as to the adequacy of exercise conduct from the NRC perspective.
 1. For a successful demonstration a statement such as “the preliminary observations of the inspection team is that, conduct of this exercise was adequate to demonstrate the licensee’s compliance with the EP Cornerstone Performance Expectation and demonstrates that reasonable assurance exists of the licensee ability to effectively implement its Emergency Plan to adequately protect the public health and safety in the event of a radiological emergency” is the preferred statement to be used at the FEMA public meeting.
 2. For an unsuccessful demonstration a statement such as the following should be made at the public meeting: “The NRC inspection team was not able to conclude its review of the exercise at this time. The NRC will continue to review the available information before issuing an official inspection report.”
 3. Potential findings against the licensee’s program as a result of the inspection should not be announced at the public meeting. NRC inspection reports are public information and will be released as soon as they are approved by management.

03.10 Review FEMA-identified Exercise Deficiencies and Remedial Actions.

- a. Request NRC Headquarters to promptly inform the regional office of any potential deficiencies and remedial actions when notified by FEMA Headquarters per the “NRC/FEMA Memorandum of Understanding.”
- b. Upon receipt of the letter providing official notification of offsite exercise deficiencies, review the proposed deficiencies and their bases for understanding. FEMA review and findings are entitled to a presumption of adequacy and are to be taken at face value. If the basis for any deficiency is not clear or if the reviewer is aware of information to the contrary, obtain clarification from NRC Headquarters staff, Regional State Liaison Officers (RSLOs), or regional FEMA staff.
- c. Inform the licensee of offsite deficiencies via formal letter.

71114-07-04 RESOURCE ESTIMATE

Direct inspection effort for this attachment is estimated to be, on average, between 78 hours and 98 hours, regardless of the number of reactor units at a site. If the resident inspector is participating as an evaluator, approximately 20 percent of the hours represent residents’ effort and 80 percent of the hours represent EP specialists’ effort. If the resident inspector is not participating as an evaluator no time is to be allotted.

When the inspection involves a co-located licensee biennial exercise, an additional 16 hours for an EP Specialist is estimated to be necessary, regardless of the number of reactor units at a site.

71114.07-05 REFERENCES

10 CFR 50 Appendix E.IV.E.8.b

NSIR-DPR-ISG-01 "Emergency Planning For Nuclear Power Plants"

Order EA-02-026, "Order for Interim Safeguards and Security Compensatory Measures," February 25, 2002.

SECY-03-0165, "Evaluation of Nuclear Power Reactor Emergency Preparedness Planning Basis Adequacy in the Post-9/11 Threat Environment," September 22, 2003.

RG 1.214, "Response Strategies for Potential Aircraft Threats," September 2009.

IP 71111.05T Fire Protection (Triennial)

Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events," July 18, 2005. (ML051990027)

IN 09-19 Hostile Action-Based Emergency Preparedness Drills (ML092250360)

IN 07-12 Tactical Communications Interoperability Between Nuclear Power Reactor Licensees And First Responders (ML070710233)

IN 02-25, "Challenges to Licensees' Ability to Provide Prompt Public Notification and Information During an Emergency Preparedness Event," August 26, 2002.

RIS 2008-08, "Endorsement of Revision 1 to Nuclear Energy Institute Guidance Document NEI 06-04, 'Conducting a Hostile Action-Based Emergency Response Drill,'" March 19, 2008.

RIS 2006-12, "Endorsement of Nuclear Energy Institute Guidance 'Enhancements to Emergency Preparedness Programs for Hostile Action,'" July 19, 2006. (ML061530290)

RIS 2004-15, "Emergency Preparedness Issues: Post-9/11," October 18, 2004.

NEI 06-04, "Conducting a Hostile Action-Based Emergency Response Drill," Revision 1, October 30, 2007. (ML073100460)

NEI White Paper, "Enhancements to Emergency Preparedness Programs for Hostile Action," May 2005 (Revised November 18, 2005).

71114-07-06 PROCEDURE COMPLETION

The performance of this IP meets the IP 71114.01 requirement to evaluate the adequacy of the licensee's conduct of the biennial exercise and its capability to assess performance via a formal critique process in order to identify and correct weaknesses. This IP is performed in place of IP 71114.01 at each power reactor site when a Hostile Action Based evaluated exercise is demonstrated. Performance of this inspection procedure is to be reported as sample size of one to IP 71114.07 for RPS purposes." Regions should use note 5 in RPS, "not applicable – completion not required during this inspection cycle" when this inspection procedure is not required to be performed.

END

ATTACHMENT 1

PRIORITIZATION OF ADDITIONAL AREAS FOR INSPECTION

General

In general, NRC oversight in EP is focused on adherence to the E-Plan with an emphasis on these most risk-significant areas, and inspection resources should be deployed in a manner to cover these areas. However, within the constraint of resources, a broad range of response areas should be inspected.

The inspector should use corrective action system data to identify response areas of concern and deploy inspection resources accordingly. Areas, (e.g., OSC, field monitor teams) that have had few critique findings or more than average (as compared to the TSC or EOF) findings should be selected for observation. Inspection resources usually deployed in the TSC, EOF, or Control Room may be used to observe other areas should the inspector identify a need.

- If the licensee's performance in previous baseline inspections in these risk-significant areas in conjunction with its performance under the DEP PI indicates reliable acceptable performance within the licensee response band, inspectors should reduce the inspection sampling in those areas and instead use a portion of available inspection resources to sample a selection of less risk significant areas.
- In order to facilitate review of critique related corrective actions, the inspector should request a corrective action system listing sorted for drill and exercise critique findings of the last 2-3 years. If possible, the findings should be sorted by response center.
- The inspector should remain alert to the impact that the licensee's performance in less risk-significant areas (e.g., staffing, training, etc.) may have on the licensee's performance of the risk-significant areas.

Prioritization of Additional Areas for Inspection

Guidance for deployment of inspection resources beyond the most risk-significant areas is provided below. These areas may generally be considered in order of importance. Selection for deployment of inspection resources should be based on knowledge of the program, previous problems and logistics.

- a. Adequacy of worker protection including accountability, evacuation, exposure authorization and thyroid protection, including actions during a hostile action [10 CFR 50.47(b)(10) & (11) and Sections IV.E and IV.I of Appendix E to 10 CFR Part 50].
- b. Adequacy of interface with offsite authorities (e.g., in the area of PAR communication and technical support). [10 CFR 50.47(b)(6) and Sections IV.A.7, IV.E.9, and IV.D of Appendix E to 10 CFR Part 50].

- c. Adequacy of arrangements for offsite resources responding to an emergency, including hostile actions, at the licensee's site [10 CFR 50.47(b)(6) and Section IV.A.7 of Appendix E to 10 CFR Part 50.]
- d. Ability to prioritize mitigation and assessment efforts to protect the public health and safety.
- e. Command and control [10 CFR 50.47(b)(1)].
- f. Ability to diagnose plant accident conditions, other than offsite consequences addressed in the risk-significant area discussion.
- g. Ability to formulate mitigating actions.
- h. Ability to implement mitigating actions (e.g., damage control teams) under accident conditions.
- i. Adequacy of communications between licensee facilities [10 CFR 50.47(b)(6) and Section IV.E.9 of Appendix E to 10 CFR Part 50].
- j. Accuracy and completeness of licensee-approved press releases [10 CFR 50.47(b)(7)].

ATTACHMENT 2

Revision History for IP 71114.07

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number
N/A	ML12100A229 05/29/12 CN 12-008	New Procedure	Yes - Provided at EP Face to Face counter-part meeting 09/09/2011	ML12100A238