

From: [Alexander, Ryan](#)
To: [Overly, John](#); [Bradley, Jeffrey](#)
Cc: [Haire, Mark](#); [Hedger, Sean](#)
Subject: Request for Information: Waterford EP Inspection (71114.04 & 71151) - Nov-Dec 2021
Date: Tuesday, October 5, 2021 8:50:27 AM
Attachments: [RFI for WF3 14.04 & 51 In Lieu of Ex \(Nov-Dec 2021\).pdf](#)
Importance: High

Mr. Overly/Mr. Bradley:

With the licensee's exemption request to be submitted requesting the postponement of the EP Exercise (and associated inspection) to a date to be determined in CY2022, the following annual inspection procedures still need to be completed at Waterford before the end of CY2021. **Therefore the purpose of this e-mail is to transmit a request for information (RFI) in support of an inspection of recent changes to Waterford's Emergency Plan/Implementing Procedures and to complete the annual Performance Indicator (PI) Verification of the three EP-related PIs.** As such, the attached Request for Information **supplements and revises** that which was previously sent to the station by Sean Hedger, on August 4, 2021 (ML21216A456).

The inspection will be conducted using IP 71114.04 and IP 71151, and it is my intention to complete this activity during the months of November and December 2021, and document it in the 4th Quarter integrated report for Waterford. This inspection will be completed by one inspector – Ryan Alexander. Depending on availability of records requested to support the revised scope of this inspection, this activity may be conducted as a remote (in-office) inspection, as a partial week onsite inspection, or combination thereof, during the months of November & December 2021. If an onsite inspection is necessary, it would occur the week of December 13, 2021, as discussed and agreed upon with Mr. Overly during a phone conversation earlier this morning.

In support of this desired timeline and balancing other inspection activities, I request that the materials described in the attachment be provided by the timelines described within via the electronic portal of the station's choosing. As further noted in the attached, if you have any questions/concerns regarding this request or some of the materials are not available to be provided electronically, please contact me using the contact information below.

This request does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget under control number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

This letter and its enclosures will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding.

Thank you,

Ryan D. Alexander

Sr. Emergency Preparedness Inspector

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**Request for Information for EP Performance Indicator Verification
and Inspection of Recent Emergency Plan Changes**

Docket 05000382 (Waterford); Inspection Report 2021004

Inspection Procedures 71151 & 71114.04

Inspection Period: Nov. 1 – Dec. 31, 2021

With the licensee's exemption request to be submitted to postpone the EP Exercise (and associated inspection) to a date to be determined in CY2022, the following annual inspection procedures still need to be completed at Waterford before the end of CY2021. As such, this Request for Information **supplements and revises** that which was previously sent to the station by Sean Hedger, on August 4, 2021 (ML21216A456). Significant changes to the RFI are indicated in **BOLD** text below.

Depending on availability of records requested to support the revised scope of this inspection, this activity may be conducted as a remote (in-office) inspection, as a partial week onsite inspection, or combination thereof, during the months of November & December 2021. If an onsite inspection is necessary, it would occur the week of December 13, 2021.

1) IP 71114.08: Exercise Evaluation – Scenario Review

Materials previously provided or superseded by changes in exercise plan. No further information required at this time.

2) IP 71114.01: Exercise Evaluation

With the postponement of the exercise to a date to be determined, the materials previously requested in 2.a through 2.f are no longer required at this time.

3) IP 71114.04: EAL and Emergency Plan Changes

*Items 3.a – 3.c are requested to be provided by **COB on Friday, 10/22/2021** via the electronic portal of the station's choosing, **in support of inspection preparation activities:***

- a) Copy of the 50.54(q) procedure (current revision)
- b) Listing of all of 50.54(q) reviews and screens performed since December 2020
- c) Listing of all 50.54(q) evaluations completed since December 2020.
 - i. Including copies of all evaluations completed [per 50.54(q) or other corrective action program process] to implement compensatory measures/contingency plans to ensure E-Plan requirements continued to be met during COVID-19 Public Health Emergency (PHE).

Additional samples of 50.54(q) screens/evaluations from the lists provided in 3.b and 3.c may be subsequently requested.

Items 3.d – 3.d are requested to be provided no later than the start of the inspection (11/01/2021) via the electronic portal of the station's choosing:

- d) **Copies of 50.54(q) screens and evaluations associated with the following E-Plan and implementing procedure changes communicated to the NRC in August 2021:**
 - i. **Waterford Emergency Plan, Revision 52**
 - ii. **EP-001-001, Emergency Action Levels, Revision 35**
 - iii. **EP-001-001, Emergency Action Levels, Revision 36**
- e) **Copies of the following documents:**
 - i. **Waterford Emergency Plan, Revision 52**

4) IP 71151: PI Verification (ERO Participation, DEP, and ANS) – ANNUAL review

- a) Please provide the applicable EP-related Performance Indicator data for:
4th Quarter 2020 through 3rd Quarter 2021 (4 quarters)

*The bulleted items below include materials and data that licensees may maintain in support of the collection and reporting of the EP-related Performance Indicators. The list is illustrative and may not be all inclusive. In general, the inspectors are requesting access to the specific materials and data that Waterford used to report the EP indicators. **If any of the materials cannot be provided electronically no later than the start of the inspection (11/01/2021), and can only be reviewed onsite, please alert the inspector promptly so planning for an onsite inspection (the week of 12/13/2021) may be completed.***

- Station procedure for Alert & Notification System (ANS) Siren Testing.
- ANS Siren Test reports for the 4 quarters.
- Station procedure(s) for EP Performance Indicator data collection and submission.
- Supporting documentation used to assess the DEP opportunities in the 4 quarters, which may include: (a) Drill/Exercise/LORT session reports, **(b) narrative of as-run drill/exercise scenarios**, (c) actual declared emergency reports/assessments (if any), and (d) copies of notification forms associated with each DEP opportunity.
- Quarterly qualification rosters (or similar) for the key ERO members who were included in the ERO Participation data for the 4 quarters.
- Qualification records for the key ERO members who were included in the ERO Participation data for the 4 quarters.
- If not included in the supporting documentation for DEP opportunities (5th bullet above), drill/exercise attendance records and any other supporting documentation used to develop the reported ERO participation PI data for 4 quarters.

Items 4.b – 4.e are requested to be provided by COB on Friday, 10/22/2021 via the electronic portal of the station's choosing, **in support of inspection preparation activities:**

- b) **List of the DEP opportunities used in developing the PI values for the 4 quarters**
Based on this list of opportunities, the inspector will further request to review a sample of the complete DEP opportunity packages.
- c) Listing of all CRs related to ANS Siren failures and/or corrective maintenance during the 4 quarters, in a sortable/searchable format.

If less than 6 CRs associated with ANS Siren failures in the 4 quarters are listed, please provide full copies of those CRs. Otherwise, the inspector will sample from the list a selection thereof for further review.

- d) Listing of all CRs related to DEP opportunity failures during the 4 quarters, in a sortable/searchable format.

If less than 6 CRs associated with DEP opportunity failures in the 4 quarters are listed, please provide full copies of those CRs. Otherwise, the inspector will sample from the list a selection thereof for further review.

- e) Listing of all CRs related to ERO qualification issues/deficiencies during the 4 quarters, in a sortable/searchable format.

If less than 6 CRs associated with ERO qualification issues in the 4 quarters are listed, please provide full copies of those CRs. Otherwise, the inspector will sample from the list a selection thereof for further review.

If there are any challenges in meeting the timelines described above, please contact the inspector for this revised inspection plan (R. Alexander at (817) 200-1195), at your earliest convenience.

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