



**Constellation
Energy Group**

Nine Mile Point
Nuclear Station

February 11, 2004

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE:	Nine Mile Point Unit 1	Nine Mile Point Unit 2
	Docket No. 50-220	Docket No. 50-410
	<u>DPR-63</u>	<u>NPF-69</u>

Submittal of Emergency Implementing Procedure Revisions

Gentlemen:

Enclosed please find a copy of the following procedure revisions for Nine Mile Point Nuclear Station:

EPMP-EPP-04	Revision 12	Emergency Exercise/Drill Procedure
EPMP-EPP-05	Revision 10	Emergency Preparedness Program Self Assessment

These procedure revisions are being submitted as required by Section V to Appendix E of 10 CFR Part 50. Should you have any questions, please feel free to contact Mr. James D. Jones, Director of Emergency Preparedness at (315) 349-4486.

Very truly yours,

A handwritten signature in black ink, appearing to read "Gary L. Detter".

Gary L. Detter
Manager Security & Emergency Preparedness

GLD/cr

Enclosure

pc: Mr. H.J. Miller, Regional Administrator, Region I (1 copy)
Mr. G.K. Hunegs, Senior Resident Inspector (1 copy)
Mr. P.S. Tam, Senior Project Manager, NRR (2 copies)

AO45

NINE MILE POINT NUCLEAR STATION
EMERGENCY PLAN MAINTENANCE PROCEDURE

EPMP-EPP-04

REVISION 12

EMERGENCY EXERCISE/DRILL PROCEDURE

TECHNICAL SPECIFICATION REQUIRED

Approved by:
G. L. Detter

William C. Byrne for G.L.D.
Manager Security and Emergency Preparedness

1/19/04
Date

Effective Date: 01/23/2004

PERIODIC REVIEW DUE DATE: AUGUST, 2004

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1.0 PURPOSE

The purpose of this procedure is to ensure that periodic exercises and drills are conducted to train and evaluate the emergency response capabilities of the Nine Mile Point Nuclear Station.

2.0 PRIMARY RESPONSIBILITIES

2.1 Director Emergency Preparedness

- 2.1.1 Ensures that drills and exercises are scheduled in accordance with this procedure.
- 2.1.2 Ensures that scenarios are prepared in a timely manner to support the Emergency Preparedness Branch Drill/Exercise Schedule.
- 2.1.3 Ensures that all significant deficiencies and comments noted during the drill/exercise are being addressed.
- 2.1.4 Ensures that Drill/Exercise Training Records for players and controllers are completed.
- 2.1.5 Approves the use of training sessions (e.g. table-tops/mini-drills) to substitute for drills.
- 2.1.6 Approves Table-top/mini-drill scenarios.

2.2 Emergency Preparedness Personnel

- 2.2.1 Schedules drills and exercises to meet the requirements of Attachment 1 and Attachment 2 .
- 2.2.2 Schedules, develops, reviews, coordinates and conducts drills and exercises in accordance with this procedure.
- 2.2.3 Requests Operations Management participation as observers in the simulators for drills/exercises.
- 2.2.4 Prepares the Post Drill/Exercise Report.
- 2.2.5 Coordinates post-drill critiques per this procedure.
- 2.2.6 Verifies the readiness of emergency facilities for drill/exercises.
- 2.2.7 Coordinates the preparation and use of mockups in drills/exercises.
- 2.2.8 Ensures the site is prepared for unannounced drills by utilizing announcements (e-mails, voice mails, etc.) using guidance provided by the NRC.

3.0 PROCEDURE

3.1 Emergency Preparedness Personnel

- a. Develop drill/exercise scenarios that incorporate elements in accordance with Attachment 1 that are demonstrated at least annually, and Attachment 2 that are demonstrated at least every 6 years as required.
- b. Should develop drill/exercise scenario packages using Attachment 3 as a guide.

- NOTES:**
1. Drill/exercise scenario packages are not required for tabletop drills, facility sessions or drills of limited scope (such as dose assessment or communications drills).
 2. Approved Operator Requalification Training Simulator Scenarios may be used as drill/exercise scenario packages.

- c. Should utilize Attachment 4 as an aid in the scenario development process.
- d. Shall maintain confidentiality of the scenario contents in accordance with existing guidelines.
- e. Should utilize Attachment 5 in the development of FEMA observed exercise scenarios.
- f. Shall ensure that drills/exercises utilize qualified observers and controllers.
- g. Should validate drill and exercise scenarios as follows:
 - Utilize staff or shift operations crew to execute the scenario and develop likely crew actions and success paths.
 - Utilize qualified persons to review the scenario package. (This review may be documented using Attachment 6.)
 - Verify proper simulator operation and response by executing the final copy of the simulator instructions in as close as reasonably achievable time frame as the scenario is required to run for the actual drill/exercise.
 - Obtain scenario validation completion signatures on scenario signature page.
 - Verify response of displays is the same as projected. Specifically:
 - (i) (Unit 2 only) DRMS displays and paper data match as close as possible
 - (ii) (Unit 2 only) Stack effluent monitors on SPDS and paper data (GEMS) match as close as possible.
 - (iii) In plant radiological monitors provided by the simulator match paper data as close as possible.
 - (iv) Paper data is on same timeline as the scenario.
 - (v) Identify differences and ensure these are covered during the briefing.

3.1 (Cont)

- h. / Shall ensure that last minute changes to the scenario are written in ink, dated and initialed by the Lead Controller, and communicated to other applicable controllers.
- i. Shall ensure that scenarios are approved as indicated by coversheet signatures.
- j. Should conduct quarterly notification drills in accordance with CAN Surveillance and Testing, detailed in EPMP-EPP-06.

3.2 Drill/Exercise Observers/Controllers/Evaluators

3.2.1 Emergency Preparedness Personnel should ensure Controllers:

- a. Are briefed prior to the drill on all pertinent aspects of the drill and what is expected of them.
- b. Be knowledgeable in the areas they are to observe.
- c. Provide data, messages and contingency messages when acting as a controller, as needed.
- d. Ensure ERO players understand that drill data provided in a paper format should not be expected to cause alarms and or system actuations, as this data is empirically derived and not driven by the simulator. Alarms and or system actuations should be verified or effected as required.
- e. Be assigned as appropriate to monitor, evaluate, and for drills only, immediately correct any mis-cues of:
 - Site Personnel
 - Survey Teams
 - Search and Rescue Teams
 - Damage Repair Teams
 - EOF Operations
 - TSC Operations
 - OSC Operations
 - JNC Operations
 - Security Personnel
 - Control Room Operations (Simulator)
 - Procedure compliance
- f. Be visibly identified as controllers (use of arm bands and/or name-tags is acceptable).

3.2.2 Emergency Preparedness Personnel should ensure Observers:

- a. Are briefed prior to the drill on areas they are expected to observe.
- b. Be knowledgeable in the areas they are to observe.
- c. Observe actions of drill players and controllers but not interact with same until after drill termination.
- d. Be visibly identified as observers (use of arm bands and/or name-tags is acceptable).

3.2.3 Emergency Preparedness may use Evaluators to ensure facility mission is being met. Emergency Preparedness should ensure Evaluators (if used):

- a. Are briefed prior to drills or exercises concerning areas they are expected to evaluate.
- b. Evaluate facility response to scenario events to ensure facility mission is being met.
- c. Determine causes for facility weaknesses or difficulty in mission completion.
- d. Communicate with the EP Lead Controller concerning findings during the drill or exercise to ensure appropriate Controller intervention, as needed.
- e. Attend post drill critique(s), as a critique contributor, to ensure significant facility issues are reviewed/identified in the critique process.

3.3 Pre-Drill Briefs

3.3.1 Emergency Preparedness Personnel should conduct a pre-drill brief for observers/controllers approximately one (1) week prior to the drill/exercise, using Attachment 8 as a guide.

3.3.2 The Simulator Lead Controller should conduct a pre-drill brief for Operations players prior to drill/exercise start time and should include the following:

- Drill instructions
- Previous drill issues/deficiencies as they pertain to the simulator
- (C5) • Open simulator discrepancies
- Simulator activities that will be evaluated

3.3.2 (Cont)

- Although a drill may be considered 'training', 'Risk Significant' activities may be evaluated against the drill objectives.
- A failure to meet specified objectives such as a risk significant activity is a significant item for consideration in qualification determination but does not necessarily imply that the individual will necessarily be disqualified.
- If the risk significant activities are to be evaluated and, following drill termination a question arises regarding SSS qualification determination in this area, then Operations Management should be notified.
- Any disagreement between EP and Operations management should be escalated to the Plant General Manager.

3.4 Post-Drill/Event Actions

3.4.1 Emergency Preparedness should conduct and document critiques immediately or as soon as practical following the drill/exercise using Attachment 9 as a guide.

3.4.2 As soon as practical, conduct a critique following a real event for the purpose of identifying strengths, areas for improvement and other comments/conditions noted. Credit towards completion of drill/exercise requirements in accordance with NTP-TQS-202 may be accomplished.

(C4) 3.4.3 Emergency Preparedness Personnel, following drill/exercise critique should:

- Ensure collection of all drill/exercise player generated paperwork.
- Ensure receipt of all controller/observer paperwork.
- Develop a matrix of checklists received to document receipt of player checklists and determine missing checklists.
- For any missing player checklist contact the responsible player and request completion of the checklist. IF this cannot be or is not performed record as incomplete and determine the need for a Deviation Event Report (DER).

- 3.4.4 The Director of Emergency Preparedness or designee should develop drill/exercise/event reports within 30 days of the completion of the drill/exercise, that:
- a. Identify observations, deficiencies, opportunities for improvement and strengths as noted by the various observers/controllers.
 - b. Determine drill/exercise performance either satisfactory or unsatisfactory based upon performance of drill/exercise objectives.
 - c. Determine if the drill/exercise should be rescheduled following an unsatisfactory performance.
 - d. Identify all comments made by the NRC, INPO or other participating outside agencies, and the actions proposed by NMPNS to resolve those comments.
 - e. Identify instances of procedure non-compliance.
 - f. Contain documentation of any DERs generated as a result of comments/evaluations received.
 - g. May contain the following sections:
 - Executive Summary
 - Drill Description
 - Strengths and Areas for Improvement by Facility (including DER numbers where appropriate)
 - General Opportunities for Improvement
 - Performance Indicators accomplished for each drill.
 - h. Should be provided to the appropriate management for their review.
- NOTE:** Review by station management is a key mechanism for informing station personnel of drill/exercise performance.
- i. Shall be retained on file in accordance with Section 6.0.

- 3.4.5 Emergency Preparedness Personnel should develop and maintain a drill element matrix based upon Attachment 1 and 2 of this procedure that:
- a. Details when each required annual and cyclic (6 year) element was last completed.
 - b. Is updated at least yearly based upon successful completion of drills/exercise elements:
 - conducted for each drill/exercise completed during the year, or
 - as a result of actual plant events following which a critique was conducted and documented, or
 - during documented training sessions.

C2

3.4.6 Emergency Preparedness Personnel should, within two days following the conduct of a drill, exercise or event in which "credit" for completion of the training requirement for drill participation will be given:

- a. Develop a list of those personnel receiving credit to include:
 - Date of the event
 - Scenario/Event Identification
 - Names of participants, with their initials signifying their participation
 - Titles/position to receive credit for
 - Social Security Number
- b. This list of personnel should be validated by the EP Director or designee (typically lead facility controller for drills/exercises)
- c. Provide this list of personnel to EP Training for inclusion in the appropriate training records.

3.5 Development/Conduct of Table-top/Mini-drills

(C3)

3.5.1 Assigned Individual should:

- a. Develop Table-top/mini-drill scenarios utilizing Attachment 3.
- b. Coordinate scheduling of required participants.
- c. Ensure the implementation plan/actions support the table-top/mini-drill objectives.
- d. Document drill participation/completion.

3.6 Unannounced Drills

3.6.1 Assigned individual should:

- a. Develop scenario
- b. Coordinate scheduling with:
 - Plant General Manager
 - Outage Management/Work Control
- c. Conduct drill
- d. Document completion

4.0 DEFINITIONS

4.1 Comments

Items identified during the conduct of the drill/exercise by controllers observers, participants, or other parties as appropriate.

a. Deficiency

An event or sequence of events (taken or omitted) that result in an identified objective of the drill or exercise being rated unsatisfactory (will be tracked via DER process).

b. Observation

A comment made by drill/exercise observers, controllers or participants, either as a strength or opportunity for improvement, which has been made for the purpose of improving the program.

c. Areas for Improvement

An identified action or sequence of actions which while not unsatisfactory, warrants improvement. Will be tracked via the DER process as applicable.

d. Strength

A perceived positive individual or group response to a drill/exercise scenario, above and beyond the expected or procedurally required actions.

4.2 Controller

Individuals assigned to various "Key" locations in order to actively direct/observe the progress of the drill/exercise by inputting drill messages and data at appropriate times and provide necessary interpretation to participants.

4.3 Drill

An instructional scenario aimed at training, testing, developing and maintaining emergency preparedness skills in a given situation.

4.4 Drill Message

A communication (usually written but may be verbal) which provides the necessary control for the drill/exercise to follow the scenario.

a. Control Message

Provide information to the participants or cause the participants to take actions to allow for the smooth progression of the scenario.

b. Contingency Message

Provide information to participants as necessary when participants either take action or fail to take actions which would change the outcome of the scenario, or provides information to participants when unavoidable events occur during the course of the scenario. (examples may include; simulator failures, inter-tie failures etc.)

4.5 Exercise

An event that is NRC observed and evaluated that tests the integrated capability of major portions of the basic elements contained within the Site Emergency Plan and respective implementing procedures.

4.6 Observer

Individual(s) assigned to monitor the activities of various emergency response groups and provide appropriate comments on personnel performance and/or facilities/hardware deficiencies. Observers should not directly interact with players during the drill.

4.7 Participation

Describes which organizations shall assist in the emergency drill/exercise and to what extent.

a. Full

Appropriate offsite local and state authorities and licensee personnel physically and actively take part in testing their integrated capability to adequately assess and respond to an accident. Participation by the Federal Emergency Management Agency (FEMA) is indicative of a full participation exercise.

4.7 (Cont)

b. Partial

Appropriate offsite authorities shall actively take part in the exercise sufficient to test direction and control functions; (i.e., protective action decision making related to emergency action levels and communication capabilities among affected state and local authorities and the licensee. May not include participation by FEMA, but may include participation by the Nuclear Regulatory Commission (NRC).

4.8 Risk Significant Activity

An activity that includes the planning standards detailed in 10CFR50.47(b)(4), (5), (9), (10), Appendix E, Section IV B, C, D(1) and D(3), which includes:

- Timely and accurate classification of the event
- Timely and accurate notification to offsite agencies
- Timely and accurate protective action recommendation (PAR) formulation and transmission to offsite agencies.

4.9 Scenario

A set of events, organized in a logical progression, presented complete with all necessary objectives, data, messages and instructions used to provide a realistic drill/exercise.

4.10 Table-top/Mini-drill

A limited scope drill that may be implemented to provide specific knowledge/skills training or to enhance the interface among specific groups.

Table-top/mini-drills may also be used to validate proposed changes to the Site Emergency Plan/Implementing Procedures.

5.0 REFERENCES AND COMMITMENTS

5.1 Technical Specifications

None

5.2 Licensee Documentation

Nine Mile Point Site Emergency Plan

5.3 Standards, Regulations, and Codes

- 5.3.1 10CFR50 Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities
- 5.3.2 10CFR50, Appendix R, Fire Protection Program for Nuclear Power Facilities Operating prior to January 1, 1979
- 5.3.3 44CFR350, U.S. Federal Emergency Management Agency, Review and Approval of State and Local Radiological Emergency Plans and Preparedness
- 5.3.4 NUREG-0654, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
- 5.3.5 NRC Inspection Module IM 82302

5.4 Policies, Programs, and Procedures

EPMP-EPP-01, Maintenance of Emergency Preparedness

5.5 Technical Information

Interim Radiological Emergency Preparedness (REP) Program Manual

5.6 Commitments

<u>Sequence Number</u>	<u>Commitment Number</u>	<u>Description</u>
None	C2	DER C-2000-0658: Questionable Drill due dates for continuing training/qualification of the ERO
None	C3	DER C-2001-5169: Support for Operator Training
None	C4	DER C-2001-5806: 12/04/01 Emergency Exercise Checklists were not filled-out/could not be located.
None	C5	DER C-2002-4395: QA Audit: Operating shift crew briefings for EP drills do not include review of current simulator discrepancies.
None	C6	DER C-2002-4412: Scenario content less than expected during 10/3/02 Site Emergency Drill.

6.0 RECORDS

6.1 The following records generated by this procedure shall be maintained by Records Management for the Permanent Plant File in accordance with NIP-RMG-01, Records Management.

- Drill/Exercise Scenarios
- Drill/Exercise Reports
- Drill/Exercise Evaluation/Comment Sheets
- Drill/Exercise Logs/Records used in each Emergency Facility
- Attachment 3, Table 1, Drill Controller Lists
- Attachment 3, Table 2, Drill Player Lists
- Attachment 7, Exercise/Drill Observation Sheets

6.2 The following records generated by this procedure are not required for retention in the Permanent Plant File.

- Attachment 4, Scenario Development Checklist
- Attachment 6, Scenario Review Checklist
- Attachment 8, Briefing Agenda
- Attachment 9, Critique Instructions

LAST PAGE

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A1	Command and control is established and maintained in each emergency facility in accordance with EPIP-EPP-18, 23.	Identify who is in charge by title	A1d	a7
A2	Each ERF develops of a 24 hour ERF staffing schedule in accordance with EPIP-EPP-23.	Provide for 24 hour emergency response and 24 hour staffing of communication links	A1e	a7
A3	TLAM ensures governmental organizations are available to provide assistance as described in Appendix A of the Site Emergency Plan in accordance with EPIP-EPP-23.	Plan shall include Federal, State and Local written agreements, including emergency measures, exchange of information	A3	a7
A4	The TDC coordinates the development of a complete 24 hour ERF staffing schedule in accordance with EPIP-EPP-23.	Each principle organization shall provide for 24 hour staffing, and identify who is in charge of assuring continuity of resources	A4	a7
A5	Control room personnel perform their ERO duties from the control room in accordance with appropriate EPIP-EPPs	Specify onsite emergency organization for all shifts, and its relation to the responsibilities and roles of the normal staff people	B1	a8
A6	The SSS assumes ED duties, and performs actions in accordance with EPIP-EPP-18.	Designate an Emergency Plan Coordinator, on shift at all times, able to do all required actions	B2	a8
A7	The SSS completes turnover of ED duties in accordance with EPIP-EPP-18 and EPIP-EPP-23.	Identify the line of succession for the Emergency Coordinator, and conditions for assuming the job.	B3	a8
A8	The staffing of all initial responder ERO positions in each ERF is in accordance with NIP-EPP-01.	Specify the positions, titles, tasks of all major players. Use Table B-1 as a guide	B5	a8
A9	The staffing of all secondary responder ERO positions in each ERF is in accordance with NIP-EPP-01.	Specify corporate admin and tech people who will augment plant staff. See Table B-1	B7	a7

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A10	The ALM performs duties associated with logistical support in accordance with EPIP-EPP-23.	Provide for logistics support (transportation, communications, temp quarters, food, water, sanitary facilities and special equip. and supplies	B7a	a7
A11	The duties associated with technical support for re-entry / recovery are accomplished in accordance with EPIP-EPP-23 & 25.	Provide for technical support for planning and reentry/recovery	B7b	a7
A12	The ED provides appropriate interface with federal, state, and local government personnel in accordance with EPIP-EPP-18, 23.	Provide for management level interface with governmental authorities	B7c	a7
A13	The JNC Director and/or ED coordinates news releases with federal, state and local personnel prior to release to the media in accordance with EPIP-EPP-18 & 23.	Provide for the release of information to the news media coordinated with governmental authorities	B7d	a7
A14	The TLAM ensures contractors are available to provide assistance as described in Appendix A of the Site Emergency Plan in accordance with EPIP-EPP-23.	Specify contractor and private organizations who may be called in to help	B8	a7
A15	(During a drill, exercise or event involving security related activities) Police (County Sheriffs) provide assistance as needed during an emergency in accordance with EPIP-EPP-10.	Identify the services to be provided by local agencies (police, medical, ambulance, fire fighting, hospital). Provide for transport and treatment of contaminated victims	B9	a7
A16	(During a drill, exercise or event involving a medical event) Medical assistance is provided as needed during an emergency in accordance with EPIP-EPP-04.	Identify the services to be provided by local agencies (police, medical, ambulance, fire fighting, hospital). Provide for transport and treatment of contaminated victims	B9	a7

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A17	(During a drill, exercise or event involving a medical event) Ambulance services provide assistance as needed during an emergency in accordance with EPIP-EPP-04.	Identify the services to be provided by local agencies (police, medical, ambulance, fire fighting, hospital). Provide for transport and treatment of contaminated victims	B9	a7
A18	(During a drill, exercise or event involving a fire) Volunteer fire fighters provide assistance as needed during an emergency in accordance with EPIP-EPP-28.	Identify the services to be provided by local agencies (police, medical, ambulance, fire fighting, hospital). Provide for transport and treatment of contaminated victims	B9	a7
A19	(During a drill, exercise or event involving a medical event) Hospitals provide assistance as needed during an emergency in accordance with EPIP-EPP-04.	Identify the services to be provided by local agencies (police, medical, ambulance, fire fighting, hospital). Provide for transport and treatment of contaminated victims	B9	a7
A20	(During a drill, exercise or event involving a medical event) Provide for transport and treatment of contaminated victims in accordance with EPIP-EPP-04.	Identify the services to be provided by local agencies (police, medical, ambulance, fire fighting, hospital). Provide for transport and treatment of contaminated victims.	B9	a7
A21	Control room and (when activated) TSC / EOF personnel identify and assess plant parameters, equipment status or other conditions as required to accurately classify the emergency in accordance with EPIP-EPP-01/02 and EPMP-EPP-0101/0102.	Establish an EAL scheme with instruments parameters and equipment used to determine if we meet them specified	D1	a2
A22	The appropriate Emergency Action Levels are used to classify and declare the emergency in accordance with EPIP-EPP-01/02.	EAL initiating conditions specified for all postulated accidents	D2	a2

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A23	The Communications Aide notifies the state, county and federal governments of the declaration of an emergency in accordance with EPIP-EPP-20.	Establish mutually agreed upon procedures for notification of response organizations consistent with EALs. Include means of verification of messages.	E1	a3
A24	Communications Aide notifies the ERO of the declaration of an emergency in accordance with EPIP-EPP-20.	Establish procedures for alerting notifying and mobilizing the ERO	E2	a3
A25	The SSS/ED completes the initial Part 1 Notification fact sheets in accordance with EPIP-EPP-20.	Establish in conjunction with state and county, the content of initial emergency messages. Must include: class of emergency, release information, potentially affected population, and PARs	E3	a3
A26	The updated Part 1 Notification fact sheets are completed in accordance with EPIP-EPP-20, and transmitted in accordance with EPIP-EPP-20 to the state and county.	Provide for follow up messages to include: 1. location of incident, with name and phone number of caller. 2. date/time of incident. 3. class of emergency. 4. licensee emergency actions underway. 5. recommended emergency actions including PARs. 6. request for any needed assistance. 7. prognosis for worsening of conditions or termination based upon plant information.	1. E4a 2. E4b 3. E4c 4. E4k 5. E4l 6. E4m 7. E4n	a4

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	NMPNS DESCRIPTION Annually, during a drill, exercise or actual event verify:	NUREG 0654 DESCRIPTION	NUREG 0654 Reference	NRC IM 82302 Reference
A27	The Dose Assessment staff in the EOF completes and ensures transmittal of the Part 2 Notification Fact Sheet in accordance with EPIP-EPP-20 & 23 to the state and county.	Provide for follow up messages to include: 1. type of actual or projected release and estimated duration or impact times. 2. estimate of quantity of rad materials released and point of release. 3. chemical and physical form of released materials, including quantities, concentrations of noble gases, iodides, and particulate. 4. meteorological conditions at appropriate levels (wind speed, direction to and from, stability, precipitation). 5. actual, or projected dose rates at site boundary, and projected integrated dose rates at site boundary. 6. projected dose rates and integrated dose rates at the projected peak and at 2, 5 and 10 miles including sectors affected. 7. estimate of surface contamination, in plant onsite and offsite.	1. E4d 2. E4e 3. E4f 4. E4g 5. E4h 6. E4i 7. E4j	a4
A28	The Communications Aide and or Communications Coordinator use normal and backup communications to the state and county in accordance with EPIP-EPP-20.	Establish reliable primary and backup means of communications to include provisions for 24 hr notification to and activation of State and Local ERO, and an alternate comm link.	F1a	a4
A29	The Communications Aide and or Communications Coordinator uses the RECS line in accordance with EPIP-EPP-20.	Make provisions for communications with state and local governments within the EPZs.	F1b	a4

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	<u>NUREG 0654</u> <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A30	The Communications Aide and or Technical Staff (TSC) uses the ENS line to communicate with the NRC in accordance with EPIP-EPP-20.	Make provisions for communicating with the federal government	F1c	a4
A31	Communications are established between all ERFs, state and local governments and rad monitoring teams in accordance with EPIP-EPP-17.	Provide for communications between the control room and EOF, state and local EOCs and rad monitoring teams	F1d	a4
A32	The Communications Aide contacts / activates the CAN system, and activates pagers in accordance with EPIP-EPP-20.	Provide for alerting and activating the ERO in each organization	F1e	a4
A33	The Rad/Dose Assessment personnel in the TSC / EOF communicate with the NRC on the HPN line and downwind teams in accordance with EPIP-EPP-23.	Provide for communications by the licensee with NRC HQ and regional EOC and the EOF and rad teams.	F1f	a4
A34	(During a drill, exercise or event involving a medical event) The CSO ensures communications are established with hospital from control room in accordance with EPIP-EPP-04, and between ambulance and hospital via radios	Provide for a coordinated communications link for fixed and mobile medical support	F2	a4
A35	Downwind Teams have access to, understand need for, and are capable of retrieving data from offsite monitors, and laboratory facilities in accordance with EPIP-EPP-12.	Provide for data from offsite monitoring and analysis equipment and lab facilities fixed and mobile for emergency access use.	H6c	a4
A36	Reactor Analyst uses EPIP-EPP-09 to determine extent of core damage.	Identify plant system and effluent parameters characteristic of off normal conditions (graphs of core damage)	I1	a1

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A37	Technical Assessment staff in the TSC determine extent of core damage using containment rad monitors, hydrogen concentration values or Chemistry samples in accordance with EPIP-EPP-09.	Provide for initial and continuing assessment using containment rad monitors, hydrogen concentration values and chemistry samples.	I2	a1
A38	Announcements associated with the emergency are made over the GAltronic in accordance with EPIP-EPP-18	Establish the means and times for notifying onsite people and people in the exclusion area including: 1. Employees not having emergency assignments. 2. Visitors. 3. Contractors and construction personnel. 4. Other people who may be in the public access areas or passing through.	1. J1a 2. J1b 3. J1c 4. J1d	a3
A39	Security ensures that personnel exit the protected area through the portal monitors, and if the portal monitors alarm, personnel are monitored by RP.	Provide for rad monitoring of evacuees	J3	a5
A40	The RPTC ensures that DCTs are qualified to use respirators, have access to them, and are provided with a briefing when they are required to be worn in accordance with EPIP-EPP-22 & EPIP-EPP-15.	Make provisions for ERO to have respiratory protection	J6a	a5
A41	The RPTC ensure DCTs and DSTs are qualified to use PCS, have access to them, and are provided with a briefing when they are required to be worn in accordance with EPIP-EPP-22.	Make provisions for ERO to have protective clothing	J6b	a5

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	<u>NUREG 0654</u> <u>DESCRIPTION</u>	<u>NUREG 0654</u> Reference	<u>NRC</u> <u>IM 82302</u> Reference
A42	The RAM and RPTC ensure DCTs and DSTs have access to KI, are provided with a briefing when it is required to be taken, and make appropriate decision to use KI when needed, in accordance with EPIP-EPP-22 & EPIP-EPP-15.	Make provisions for the ERO to use KI	J6c	a5
A43	The development, review, approval and distribution of PARs to state and county is in accordance with EPIP-EPP-08 & 23.	Establish the mechanism for making PARs	J7	a6
A44	(During a drill, exercise or event involving a medical event) The RP Technicians ensure dose rates are controlled in accordance with EPIP-EPP-04, for removal of injured personnel.	Establish onsite exposure guidelines consistent with EPA PAGs for removal of injured people	K1a	a5
A45	The RAM and RPTC ensure dose rates are controlled in accordance with EPIP-EPP-15, for undertaking corrective actions.	Establish onsite exposure guidelines consistent with EPA PAGs for undertaking corrective actions	K1b	a5
A46	The RPTC advises DCTs and DSTs of dose deltas, track and control exposures in accordance with EPIP-EPP-15 & 22, for performing assessment actions.	Establish onsite exposure guidelines consistent with EPA PAGs for performing assessment actions	K1c	a5
A47	(During a drill, exercise or event involving a medical event) The RP Technician ensures dose rates are controlled in accordance with EPIP-EPP-04, for performing first aid.	Establish onsite exposure guidelines consistent with EPA PAGs for providing first aid	K1d	a5
A48	(During a drill, exercise or event involving a medical event) The RP Technician ensures dose rates are controlled in accordance with EPIP-EPP-04, for performing personnel decontamination.	Establish onsite exposure guidelines consistent with EPA PAGs for performing personnel decon	K1e	a5

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A49	(During a drill, exercise or event involving a medical event) The RP Technician ensures dose rates are controlled in accordance with EPIP-EPP-04, for providing ambulance services.	Establish onsite exposure guidelines consistent with EPA PAGs for providing ambulance service	K1f	a5
A50	(During a drill, exercise or event involving a medical event) The RP Technician ensures dose rates are controlled in accordance with EPIP-EPP-04, for providing medical treatment.	Establish onsite exposure guidelines consistent with EPA PAGs for providing medical treatment	K1g	a5
A51	The RAM ensures that radiological work practices are in accordance with approved RP procedures and EPIP-EPP-15 as appropriate.	Provide for an onsite rad protection program	K2	a5
A52	The RAM and RPTC ensure that dosimetry is distributed and used, in accordance with approved RP procedures and EPIP-EPP-15.	Provide for 24 hr capability to determine dose of ERO, including distribution of dosimetry both self reading and permanent record devices	K3a	a5
A53	The RAM, the RPTC, and the ODAM ensure that dosimetry is monitored and recorded in accordance with approved RP procedures.	Ensure dosimeters are read at appropriate frequencies, and maintain records	K3b	a5
A54	The RAM and RPTC ensure that decontamination practices are in accordance with approved RP procedures.	Procedures shall specify action levels for determining the need to decon.	K5a	a5
A55	(During a drill, exercise or event involving a medical event) The RP Technician ensures decontamination and disposal of waste during a medical emergency is in accordance with EPIP-EPP-04.	Procedures shall establish the means for decon of wounds, provide for supplies, instruments, and equipment and for waste disposal	K5b	a5

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A56	The RAM and RPTC provide for onsite contamination control including area access control in accordance with approved RP procedures and EPIP-EPP-23.	Provide for onsite contamination control including area access control	K6a	a5
A57	Announcements include the words "no eating drinking smoking until habitability is confirmed" in accordance with EPIP-EPP-18.	Provide for onsite contamination control including drinking water and food supplies	K6b	a5
A58	The RAM and RPTC ensure that onsite contamination control including criteria for return of work areas to normal use are in accordance with approved RP procedures.	Provide for onsite contamination control including criteria for return of work areas to normal use.	K6c	a5
A59	(During a drill, exercise or event involving a medical event) Fire brigade members provide first aid in accordance with EPIP-EPP-04.	Provide onsite first aid capability	L2	a5
A60	Personnel collect water samples and provide for its analysis in accordance with EPIP-EPP-16.	Plant environs and radiological monitoring drill shall be done annually. Include collection and analysis of water	N2d	b13
A61	Personnel collect vegetation samples and provide for its analysis in accordance with EPIP-EPP-16.	Plant environs and radiological monitoring drill shall be done annually. Include collection and analysis of vegetation.	N2d	b13
A62	Personnel collect soil samples and provide for its analysis in accordance with EPIP-EPP-16.	Plant environs and radiological monitoring drill shall be done annually. Include collection and analysis of soil.	N2d	b13

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	<u>NUREG 0654</u> <u>DESCRIPTION</u>	<u>NUREG 0654</u> Reference	<u>NRC</u> IM 82302 Reference
A63	Personnel collect air samples and provide for its analysis in accordance with EPIP-EPP-07.	Plant environs and radiological monitoring drill shall be done annually. Include collection and analysis of air.	N2d	b13
A64	Airborne and liquid samples and data from direct measurements in the environment are obtained and used in accordance with EPIP-EPP-06 & 07.	Response to and analysis of elevated airborne and liquid samples and direct measurements in the environment.	N2e1	NA
A65	Reactor Analyst uses Chemistry sample data to analyze and make core damage assessments in accordance with EPIP-EPP-09.	Analysis of in-plant liquid samples with actual elevated radiation levels.	N2e2	NA

ATTACHMENT 2

NINE MILE POINT DRILL/EXERCISE ELEMENTS DEMONSTRATED DURING A SIX YEAR CYCLE				
ID #	<u>NMPNS DESCRIPTION</u> At least once every 6 years during a drill, exercise or event verify:	<u>NUREG 0654 DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
C1	The JNC is fully activated and performing all functions specified in accordance with EPIP-EPP-27	Designate points of contact and physical location for use by the media	G3a	b2
C2	NA (JNC is located next to the EOF, No additional space is required for media in the EOF)	Provide space at the EOF for the media	G3b	b2
C3	The JNC Director performs actions in accordance with EPIP-EPP-27 and EPIP-EPP-23.	Designate a spokesperson at the JNC	G4a	b2
C4	The JNC new briefings are coordinated amongst all required participants, and media briefings involve all requisite parties in accordance with EPIP-EPP-27.	Arrange for timely exchange of info between all spokespersons.	G4b	b2
C5	Rumor control is active and participating within the JNC and are being called by designated "rumor control message providers" providing rumor messages.	Establish coordinated arrangements for dealing with rumors	G4c	b2
C6	Offsite Dose Assessment Staff performs offsite dose assessment based upon containment radiation monitors using EDAMS in accordance with EPIP-EPP-08.	Establish procedures and techniques for the determination of source terms, using containment rad monitors	I3a	b14
C7	Offsite Dose Assessment Staff performs offsite dose assessment based upon plant parameters and effluent monitors using EDAMS in accordance with EPIP-EPP-08.	Establish procedures and techniques for determination of magnitude of release based upon plant parameters and effluent monitors.	I3b	b143

ATTACHMENT 2

**NINE MILE POINT DRILL/EXERCISE ELEMENTS
DEMONSTRATED DURING A SIX YEAR CYCLE**

ID #	<u>NMPNS DESCRIPTION</u> At least once every 6 years during a drill, exercise or event verify:	<u>NUREG 0654 DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
C8	Offsite Dose Assessment Staff performs offsite dose assessment with varying meteorological conditions using EDAMS in accordance with EPIP-EPP-08.	Establish the relationship between the effluent monitors and onsite and offsite exposures for various meteorological conditions.	14	b14
C9	Offsite Dose Assessment Staff performs offsite dose assessment with default values using EDAMS in accordance with EPIP-EPP-08.	Establish methodology for determination of release rate/projected doses if instrumentation used for assessment if inop/unavailable.	16	b14
C10	Downwind survey teams are dispatched to collect and transmit data in accordance with EPIP-EPP-07.	Describe the capability and resources for field monitoring within the plume exposure pathway.	17	b13
C11	The downwind survey teams are qualified, briefed, have appropriate monitoring and communications equipment, vehicles and procedures to provide data to the Offsite Dose Assessment Manager in order to determine location and magnitude of release in accordance with EPIP-EPP-08.	Provide the methods, equipment and expertise to make rapid assessments of the actual or projected magnitude and locations of any releases. Including field team composition, transportation, communication, monitoring equipment and estimated deployment times.	18	b13
C12	The downwind survey teams have the equipment to detect and measure radioiodine as low as 10 ⁻⁷ uci/cc	Have the capability to detect and measure radioiodine as low as 10 ⁻⁷ uci/cc	19	b14

ATTACHMENT 2

NINE MILE POINT DRILL/EXERCISE ELEMENTS DEMONSTRATED DURING A SIX YEAR CYCLE				
ID #	<u>NMPNS DESCRIPTION</u> At least once every 6 years during a drill, exercise or event verify:	<u>NUREG 0654 DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
C13	The Offsite Dose Assessment staff uses EDAMS to determine integrated dose from projected or actual dose and compares them to the PAGs in accordance with EPIP-EPP-08.	Establish means for relating various measured parameters to dose rates for key isotopes and gross rad measurements. Provisions shall be made for estimating integrated dose from the projected/actual dose and comparing them with PAGs. Details shall be provided in separate procedures.	I10	b14
C14	The Offsite Dose Assessment Manager coordinates the collection of field data with state and federal resources.	Arrange for tracking of the plume using state and federal resources	I11	b13
C15	Accountability of personnel remaining within the protected area completed within 30 minutes in accordance with EPIP-EPP-05D	Provide for accountability for all people on site and ascertain who is missing within 30 minutes	J5	b17
C16	NA State and Local requirement only	State and locals must make provisions for implementing protective measures based upon PARs consistent with EPA PAGs for food and animal feeds	J9	b12
C17	NA State and Local requirement only	Plans shall provide for means of relocation	J10g	b11
C18	NA State and Local requirement only	State shall specify protective measures to be taken for the ingestion pathway	J11	b12

ATTACHMENT 2

**NINE MILE POINT DRILL/EXERCISE ELEMENTS
DEMONSTRATED DURING A SIX YEAR CYCLE**

ID #	<u>NMPNS DESCRIPTION</u> At least once every 6 years during a drill, exercise or event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
C19	NA State and Local requirement only	State and locals establish decision chain for authorizing emergency exposures	K4	b4
C20	(During a drill, exercise, or event involving a medical event) Oswego Hospital and or University Hospital participates in providing appropriate medical services to injured personnel having radiation exposure or uptake in accordance with appropriate Hospital Plan.	Arrange for local and backup hospital and medical services	L1	b4
C21	(During a drill, exercise or event involving a medical event) Ambulance services from Oswego County provide appropriate medical transport of contaminated injured personnel to medical facilities.	Shall arrange for transport of victims of rad accidents to medical support facilities	L4	b5
C22	ED directs event termination and entry into the recovery phase actions in accordance with EPIP-EPP-25.	Develop general plans and procedures for reentry, and recovery	M1	b18
C23	Full activation of NY State Emergency Management and Oswego County Emergency Management Offices occur.	Exercise shall include mobilization of state and local personnel and verify resources are adequate.	N1b	b1
C24	New York State and Oswego County fully participate, and the critique is conducted by New York State and Federal evaluators.	Drills/exercise must be critiqued by state and federal evaluators	N1b	b1

ATTACHMENT 2

NINE MILE POINT DRILL/EXERCISE ELEMENTS DEMONSTRATED DURING A SIX YEAR CYCLE				
ID #	<u>NMPNS DESCRIPTION</u> At least once every 6 years during a drill, exercise or event verify:	<u>NUREG 0654 DESCRIPTION</u>	<u>NUREG 0654 Reference</u>	<u>NRC IM 82302 Reference</u>
C25	That once per 3 years, a drill or exercise commences between the hours of 6:00pm and 4:00am that involves full staffing of the ERFs in accordance with EPIP-EPP-13.	Drills/exercise must provide for off-hours staffing (6:00pm to 4am) once per 6 year cycle.	N1b	b1
C26	The drill or exercise is conducted in various types of weather.	Drills/exercises must be done in various weather per 6 year cycle	N1b	b1
C27	The drill or exercise is conducted in which the exact time and date has been disclosed to only a limited number of personnel, none of which is an initial responder with a role as a drill participant in the drill.	Some drills/exercise should be unannounced in a 6 year cycle	N1b	b1
C28	The drill or exercise includes participation by the fire brigade members.	Shall include fire drills in accordance with Tech Specs in a 6 year cycle	N2b	b3
C29	(During a drill, exercise or event involving a medical event) Participation by Oswego or University Hospital and local ambulance corps.	Shall include annual medical drills with provisions for participation by local support services and hospitals.	N2c	b5
C30	Done annually, see A60-63	Plant environs and radiological monitoring drill shall be done annually. Include collection and analysis of all sample media	N2d	b13
C31	The drill or exercise includes participation by Security to provide prompt access for emergency vehicles.	Establish a training program for police, security, fire	O4d	b7

ATTACHMENT 2

**NINE MILE POINT DRILL/EXERCISE ELEMENTS
DEMONSTRATED DURING A SIX YEAR CYCLE**

ID #	<u>NMPNS DESCRIPTION</u> At least once every 6 years during a drill, exercise or event verify:	<u>NUREG 0654 DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
C32	The drill or exercise includes participation by an Oswego County Fire Department(s).	Establish a training program for police, security, fire	O4d	b3
C33	The drill or exercise includes participation by first aid and rescue teams.	Establish a training program for first aid and rescue teams	O4f	b4
C34	The drill or exercise includes participation by medical support services.	Establish a training program for medical support services	O4h	b5
C35	The drill or exercise includes participation by CEG personnel, as appropriate.	Establish a training program for licensee HQ people	O4i	b6

ATTACHMENT 3: GENERAL OUTLINE FOR NMPNS DRILL/EXERCISE SCENARIOS

Example of a Cover/Sign-off Page

Nine Mile Point Nuclear Station Unit ____ Emergency Preparedness Drill Scenario for the Emergency Preparedness Drill/Exercise to be conducted on _____																	
Submitted by:	_____ Date _____																
Approvals:	_____ Date _____ Director Emergency Preparedness																
	_____ Date _____ **Plant General Manager																
<p>** This signature denotes approval to commit appropriate resources to perform this Emergency Preparedness Drill. Since this individual may be a drill player he has not been allowed to view the material contained in this scenario.</p> <p>NOTE: Validation means all aspects of the scenario, such as radiological or chemistry data, whether provided via simulator modeling or on paper, has been reviewed for accuracy and completeness.</p> <p>Scenario Validation:</p> <table><tr><td>_____</td><td>_____</td></tr><tr><td>Operations Supervision</td><td>Date</td></tr><tr><td>_____</td><td>_____</td></tr><tr><td>Radiation Protection Supervision</td><td>Date</td></tr><tr><td>_____</td><td>_____</td></tr><tr><td>Chemistry Supervision</td><td>Date</td></tr><tr><td>_____</td><td>_____</td></tr><tr><td>Other (Specify discipline)</td><td>Date</td></tr></table>		_____	_____	Operations Supervision	Date	_____	_____	Radiation Protection Supervision	Date	_____	_____	Chemistry Supervision	Date	_____	_____	Other (Specify discipline)	Date
_____	_____																
Operations Supervision	Date																
_____	_____																
Radiation Protection Supervision	Date																
_____	_____																
Chemistry Supervision	Date																
_____	_____																
Other (Specify discipline)	Date																

ATTACHMENT 3 (Cont)

Scenario Table of Contents Page

This example of a Scenario Table of Contents page may be contained in scenarios to allow for easy access of scenario sections and information. Each scenario page should have a unique page number.

SECTION	TITLE
1.0	* SCOPE, OBJECTIVES AND DRILL/EXERCISE ELEMENT REQUIREMENTS
2.0	DRILL SCHEDULE AND EXTENT OF PLAY
3.0	* DRILL INSTRUCTIONS
4.0	* SCENARIO ASSUMPTIONS
5.0	* SCENARIO SUMMARY <u>AND</u> TIME LINE
6.0	* DRILL MESSAGE SUMMARY TABLES
7.0	OPERATIONAL DATA
8.0	CHEMISTRY DATA
9.0	RADIOLOGICAL RELEASE DATA
10.0	DOWNWIND SURVEY TEAM DATA
11.0	JNC INQUIRIES
ATTACHMENTS (As necessary)	

* Required for Table-top/Mini-drills

ATTACHMENT 3 (Cont)

Drill/Exercise Scope Page

This example of a Drill/Exercise Scope page is contained in the scenario after the cover/sign off page. All scenario reviewers may review this drill/exercise scope page.

Nine Mile Point Nuclear Station Unit _____

Scope of the Emergency Preparedness Exercise
to be conducted on _____

1. Simulated radiological emergency
2. Classification and Notification
3. Staffing and Activation of facilities
4. Accountability
5. Evacuation
6. On-site and Off-site Dose Assessment
7. Damage Control Team Response
8. Oswego County Participation (partial)
9. New York State Participation (partial)
10. EPMP-EPP-01, Attachment 2 items

ATTACHMENT 3 (Cont)

1.0 OBJECTIVES

*State basic objectives of the proposed exercise/drill and which portions of the Emergency Plan will be tested.

2.0 DRILL SCHEDULE AND EXTENT OF PLAY

- State appropriate date(s), time(s), location(s) and participants of exercise/drill briefing(s), exercise and critique(s).
- State work interruption (if any) to result from the exercise/drill.

3.0 DRILL INSTRUCTIONS

- * Discuss observer and controller conduct and responsibilities
- * Discuss drill player conduct and instructions
- Identify observers by location
- * Describe the method to be used in controlling flow of exercise/drill events
- Describe reports required/written for this scenario.
- Provide a list of controllers for all drills. This list should include location, Controller or Observer name, and communication method.

4.0 SCENARIO ASSUMPTIONS

Provide a list of all appropriate assumptions considered in developing scenario.

5.0 SCENARIO SUMMARY AND TIME LINE

Prepare a summary of the drill/exercise details such as:

- * Condensed time schedule of real and simulated events
- * Simulated casualties (if any)
- Whether or not the presence of radioactive contamination is to be assumed
- Whether evacuations will be necessary
- Deployment of radiological monitoring teams (In plant and downwind)
- Supplemental Scenarios (should contain one for each malfunction)

* Required for Table-top/Mini-drills

ATTACHMENT 3 (Cont)

6.0 DRILL MESSAGE SUMMARY TABLES

- * Messages should include all contingency messages and may contain controller notes to aid in the conduct of the scenario.
- Actual Messages should be identical to summary.
- Actual Messages shall not contain any anticipated actions or expected actions which could act as a prompt.
- Public information activities to be initiated

7.0 OPERATIONAL DATA

Attachments (as necessary)

- Provide observers and participants with the necessary information, data, pre-selected situations, etc. that they will need to perform their assigned responsibilities.
- Control Room/TSC/EOF paper data should only be used if the simulator fails. The Lead Controller will prompt facility lead controllers when paper data is to be used.
- Ensure this note is included with all paper data (except chemistry data, and meteorological data) that will be provided to ERO drill/exercise players stating:
- **This data was developed using methods other than the simulator. Any expected actions such as alarms or system actuation's that would be expected to occur should be verified and or effected when the associated setpoint is reached according to the data table provided.**

8.0 CHEMISTRY DATA

- Provide observers and participants with any necessary information that they will need to perform their assigned responsibilities.

9.0 RADIOLOGICAL RELEASE DATA

- Includes meteorological data (forecast, emergency met reports), and any release information. Use paper data where simulator data does not model the desired outcome.

10.0 DOWNWIND SURVEY TEAM DATA

- **This data was developed using methods other than the Simulator.**
- Provide Controllers and Players with any necessary information that they will need to perform their assigned responsibilities.

11.0 JNC INQUIRIES

ATTACHMENTS:

- Provide a drill participant roster for the drill/exercise. This list should include location, ERO position, name, place to initial, and Social Security #. This list may be used by the training organization as proof of drill participation as required to maintain ERO qualification status. Table 2 may be used as a guide.

- * Required for Table-top/Mini-drills

TABLE 1
Controller/Observer List (ERO Team X)
 (Example)

Drill Controller List for Site Drill/Exercise			
Location	Controller Position	Controller Name	Communication Method
Simulator	Drill Lead		Pager
Simulator	Command/Control		Ext.
Simulator	Operations		Ext.
Simulator	Communications Aide		Ext.
Simulator	Simulator Operator		Ext.
TSC			
TSC	Facility Lead		Ext.
TSC	Command/Control		Ext.
TSC	Tech Data Coordinator		Ext.
TSC	Tech Staff		Ext.
Ext.	Rad Assessment		Ext.
Ext.	RX Analyst		Ext.
TSC	Maintenance Coord.		Ext.
TSC	NED		Ext.
OSC			
OSC	Facility Lead		Ext.
OSC	Command/Control		Ext.
OSC	Communicator		Ext.
OSC	DCT Coordinator		Ext.
OSC	DCT Coordinator		Ext.
OSC	Ops DCT Controller		Ext.
OSC	Ops DCT Controller		Ext.
OSC	RP Team Coordinator		Ext.
STOC/PAC	Security		349-
EOF			
EOF	Facility Lead		Pager
EOF	Command/Control		Pager
EOF	Rad Assessment		Pager
EOF	Communications Coord.		Pager
EOF	Technical Assessment		Pager
EOF	TLAM		Pager
EOF	ALM		Pager
EOF	EOF/JNC Liaison		Pager
EOF	Downwind Team A		Radio: Off Site Radio
EOF	Downwind Team B		Radio: Off Site Radio
EOF	Downwind Team C		Radio: Off Site Radio
EOF	Security		Pager
JNC			
JNC	Facility Lead		Pager
JNC	Command/Control		Pager
JNC	Spokesperson Controller		Pager
JNC	Rumor Control Cont.		Pager

ATTACHMENT 3: (Cont)

TABLE 2

(Example)

DRILL/EXERCISE Date _____				List Verified to be Accurate _____ / _____ EP Personnel Date		
LOCATION	ERO POSITION	NAME	INITIALS	SOCIAL SECURITY #		

ATTACHMENT 4

SCENARIO DEVELOPMENT CHECKLIST		
<i>Item</i>	<i>Description</i> <i>Drill Date: _____</i>	<i>Date</i> <i>(Week)</i>
1	Review last 2 years of scenarios to determine EALs used & ID EALs not used <ul style="list-style-type: none"> • Vary EALs encountered during drills to ensure a wide variety of EALs are used over a 6 year period 	
2	Review industry events file for ideas	
3	Develop scope & review with EP Director	
4	Develop thumbnail timeline of scenario <ul style="list-style-type: none"> • Brain storm session with EP Staff • Consider initial conditions and how these can help to get the scenario to where you want it to go • Ensure the scenario is as realistic as possible. • Consider not going to a General Emergency during off-year drills • Consider letting the players "win" 	
5	Arrange for simulator development time (time in simulator): <ul style="list-style-type: none"> • On simulator schedule and in ops training schedule 	
6	Arrange for initial simulator scenario validation time: <ul style="list-style-type: none"> • On simulator and Ops schedule • Simulator support to assist if U2 (final data download) 	
7	Arrange for Ops training or Training staff to assist in simulator	
8	Arrange for final simulator validation <ul style="list-style-type: none"> • On Ops and Simulator schedule • Arrange for Ops training or training staff to assist 	
9	Review objectives and compare with timeline to determine what inject messages may be needed to ensure objective completion <ul style="list-style-type: none"> • Reference EP drill/exercise inject messages folder located on the W drive under Scenarios 	

ATTACHMENT 4 (Cont)

SCENARIO DEVELOPMENT/CHECKLIST		
<i>Item</i>	<i>Description</i> <i>Drill Date:</i> _____	<i>Date</i> <i>(Week)</i>
10	<p>Review thumbnail timeline to determine if simulator malfunctions are available (can the simulator do what you want?). Develop:</p> <ul style="list-style-type: none"> • Scenario initial conditions • Simulator initial conditions for scenario. List: <ol style="list-style-type: none"> 1. Initial malfunction presets 2. Initial I/O presets 3. Initial Annunciator Overrides • Malfunctions (based upon thumbnail timeline) needed to cause the desired series of events. Include the following: <ol style="list-style-type: none"> 1. Malfunction # 2. Approximate time or condition when to go active 3. Initial ramp rates or values and final rates or values 4. Include statement, "Do not enter this malfunction until told to do so by Lead Controller". 5. Expected plant response 6. Expected operator response or actions 7. Expected Emergency plan response 8. Any DCT items (develop supplemental scenarios for each malfunction as required). Include Controller Communication links, where applicable. 9. When any fuel damage occurs, amount (in %), and general methodology • If release is desired, list start and end times in scenario. Include: <ol style="list-style-type: none"> 1. Release origin 2. Data needed 3. IOs needed to ensure crew can determine a release is in progress • Ensure scenario provides information to address environmental concerns (heat, smoke, steam, chemical, etc.) • Scenario termination point based upon desired objectives 	
11	<p>Write definitive scenario timeline that will be used for validation. (Two ways -- one for simulator operator to use and one for notes during validation) Include:</p> <ol style="list-style-type: none"> 1. All items as appropriate 2. Inject messages 3. Announcements (if different than free played by the SSS. Example: accountability termination) 	

ATTACHMENT 4 (Cont)

SCENARIO DEVELOPMENT CHECKLIST		
<i>Item</i>	<i>Description</i> <i>Drill Date: _____</i>	<i>Date</i> <i>(Week)</i>
12	<p>Start running release cases on WINDOSE. Want to determine:</p> <ol style="list-style-type: none"> 1. Release magnitude (Ci/sec) 2. Release direction 3. Downwind release rates (mR/hr) 4. Iodine effects (typically iodine raises downwind doses too much) 5. Effects on in-plant rad monitors (U1 will have to IO some monitors. Use data downloaded for U2.) 	
13	<p>Run 1st validation with crew. Get ideas from the crew.</p> <ul style="list-style-type: none"> • Will the crew see what you want them to see? • Ensure no gray areas. Each EAL condition should be clearly identifiable. • Are there any more malfunctions that could be added to ensure DCTs have enough to do? • What happened to make each malfunction/equipment fail? Use this input for supplemental scenarios. Include why it was important to fail the equipment at this time in the scenario. 	
(C6) 14	<p>Using information gathered during 1st run, edit scenario as necessary include all potential data points for the following:</p> <ul style="list-style-type: none"> • In-plant maps, to include radiological information, including dose rates, airborne contamination levels, surface contamination levels • Reactor water sample results • Other effluent process samples • Downwind maps • Met data, including emergency met handouts • Other data tables 	
15	<p>Develop Controller list using on-deck team. (See Table 1)</p> <ul style="list-style-type: none"> • Send out Drill Support Requirements Memo about 4 weeks prior to the drill • Obtain extra DCT Controller support as needed. • Ensure appropriate department provides controllers where needed 	
16	<p>Have scenario copies made for EP staff and a member of RP Staff to review at this point with a 1 week turnaround.</p> <ul style="list-style-type: none"> • Include data obtained from WINDOSE 	
17	<p>Arrange for briefing and post drill critique locations preferably onsite.</p> <ul style="list-style-type: none"> • Reserve rooms, Verify @ 6 weeks prior & 2 weeks prior to drill 	
18	<p>Rewrite scenario based upon comments from EP staff.</p> <ul style="list-style-type: none"> • Recopy for EP staff use during final validation. • Redo WINDOSE as needed 	

ATTACHMENT 4 (Cont)

SCENARIO DEVELOPMENT CHECKLIST		
<i>Item</i>	<i>Description</i> <i>Drill Date:</i> _____	<i>Date</i> <i>(Week)</i>
19	Run final validation. Scenario should be run with no major goofs on the timeline. <ul style="list-style-type: none"> • Shrink time between major EAL changes to shorten validation time • If U2, ensure times/data are captured & filed for downloading • If U2, denote time shrinkage (problem time) to ensure accurate "stretching" of downloaded data for preparation of paper data. 	
20	Rewrite final scenario <ul style="list-style-type: none"> • Correct minor errors • Major errors require additional scenario validation 	
21	Develop This Week In Nuclear memo. Ensure memo is in issue 1 week prior to drill briefing.	
22	Ensure drill support is obtained for the following: <u>Simulator</u> <ul style="list-style-type: none"> • Communications Aide • Extra CSO or designee, for in-plant announcements • RP Technician • Chemistry Technician • Management Observer <u>JNC</u> <ul style="list-style-type: none"> • Players for Rumor Control/Media Monitoring • Rumor control callers, relative to number of players 	
23	Send final version to copy for briefing (35-40 copies). <ul style="list-style-type: none"> • Ensure maps, handouts, etc. are included. 	
24	Revise drill evaluation checklists <ul style="list-style-type: none"> • Include revised drill critique summary sheets 	
25	Email and voice mail to Controllers <ul style="list-style-type: none"> • Send invitations to briefing and post-drill rollup critique 	
26	Send drill cover page, scope & objectives to Plant General Manager for review/signature	

ATTACHMENT 4 (Cont)

SCENARIO DEVELOPMENT CHECKLIST		
Item	Description <i>Drill Date: _____</i>	Date (Week)
27	Validate proper operation of the following 1 week prior to AND the week of the drill: <ul style="list-style-type: none"> • Simulator inter-tie • Phones (ED Hotline, RECS, Tech Info Line, Drill Controller Line) • Headsets 	
28	Ensure breakfast and lunches (sandwiches, salads, cookies, drinks, etc.) are ordered for the facilities at least 1 week prior to drill	
29	Ensure 3 vehicles are reserved for Downwind Survey Team use. Vehicles should be able to support 3 people and equipment.	
30	Conduct Briefing: <ul style="list-style-type: none"> • Utilize Drill Brief Agenda guideline, Attachment 8 	
31	Contact CAN to arrange for roll-play as necessary, minimally 48 hours prior to the drill/exercise.	
32	Prepare Bulletin Board Announcement & post 3 weeks ahead	
33	Prepare final scenario implementation paperwork <ul style="list-style-type: none"> • In-plant announcements (mock-up) • Sign-in Rosters • CAN Report for each ERF • Scripts to Media/Public Inquiry Clerks • Provide Lessons Learned Package/Training, as needed 	
34	Film the Media video for use at JNC and test	
35	Ensure vehicle placards are staged "Vehicle Staged for Drill"	
36	Arrange for simulated (or actual) Media personnel for the JNC, if available	
37	Brief Facility Leads – Command and Control	
38	Verify Facility Leads conduct Team Meetings	
39	Run drill <ul style="list-style-type: none"> • Conduct critiques, utilizing Critique Instructions, Attachment 9 • Gather comments 	

ATTACHMENT 4 (Cont)

SCENARIO DEVELOPMENT CHECKLIST		
<i>Item</i>	<i>Description</i> <i>Drill Date: _____</i>	<i>Date</i> <i>(Week)</i>
40	Ensure post-drill facility cleanup is performed: <ul style="list-style-type: none"> • Clerical staff assigned • All drill materials gathered and saved • Forms drawers checked for replacements • Procedures re-placed • Boards cleaned as necessary • Post-drill inventories performed IAW EPMP-EPP-02 • B&G contacted for facility cleaning 	
41	Review drill comments with EP staff and develop drill report	
42	Finalize drill report	

ATTACHMENT 5: MILESTONES FOR EXERCISE OBSERVATION AND CRITIQUES

Days		
<u>Full Participation</u>	<u>Partial Participation</u>	
-90	-90	State and licensee jointly develop and submit the description, scope and objectives to be fulfilled to FEMA and NRC Regional Office respectively.
-75	-75	FEMA and NRC Regional Office complete reviews of objectives and extent of play and provide written comments after meeting with licensee/State, if necessary.
-60	-60	Complete exercise scenario package with modified objectives, schedules, exercise rules, all controller, contingency and simulation information, all data, including plant data, radiation level and release rate data, and samples of the data sheets to be presented to exercise players should be received in the Region I office and by FEMA.
-45	-45	FEMA and NRC Regions contact or meet with State and licensee to discuss modifications and complete the scenario. Agreed upon changes or modifications should be documented and distributed.
-35	-35	Federal controller's meeting to develop coordination of exercise.
-30	-30	FEMA and NRC Regions develop specific post-exercise activity schedule for debriefing and meetings with the State. Also, NRC will provide comments in writing of any additional items, if necessary.
-15	-15	The RAC Chair (and NRC team leader as available) develops evaluator action plan (where stationed, how many from each organization, what to look for).
-1	-1	All Federal observers, both on-site and off-site, meet in the exercise area to receive orientation and receive instructions.
E Day	E Day	Exercise. Evaluators hold Exit interviews with participants (at assigned locations).

ATTACHMENT 5 (Cont)

<u>Days</u>		
<u>Full Participation</u>	<u>Partial Participation</u>	
E + 1	E + 1	Evaluator debriefing conducted by RAC chair.
E + 1 or 2	E + 1 or 2	NRC holds onsite Exit Meeting.
Same	E to +2 Days	Joint RAC/NRC critique, participating meeting.

General Agenda

- a. Review of on-site action by NRC.
- b. Licensee presents their views.
- c. Review of off-site actions by RAC Chairman.
- d. State and locals present their views.
- e. Review of Federal response (if applicable) by RAC Chairman.
- f. Opportunity for clarification questions or comments by licensee, State and County. (Press and public questions will not be entertained during the critique.)
- g. Meeting involving exercise participants, representatives from NRC and other appropriate federal agencies.

Same	+30 Days	Written critiques by FEMA Region to State, with copies to FEMA Headquarters and NRC, and by NRC Region to licensee, with copies to NRC Headquarters and FEMA.
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ATTACHMENT 6: SCENARIO REVIEW CHECKLIST

This checklist provides guidance on those items which should be considered when reviewing an emergency preparedness drill scenario.

Instructions: When reviewing a scenario ask yourself the following questions. If your answer is no to any question then what changes can you recommend to the scenario to make the answer become a yes? Please provide recommendations on Scenario Review Checklist Comments.

Checklist for scenario Date _____ Rev. _____ YES NO/NA

1. Is the data/information correct (technically, procedurally)?
 - a. Does the data/information reflect the scenario events?
 - b. Is the data/information sufficient to assist the players in an accurate assessment of drill events?
 - c. Does the data/information support the anticipated actions?
2. Is the data realistic for the situation?
3. Are the expected actions really those of a worker at Nine Mile?
4. Is all the information a player may request available?
5. Does message information consider human factors?
6. Do the messages/data give enough information to players (without prompting)?
7. Do the messages/data provide information to players without compromising the scenario chain of events?
8. Are the Mockups (if used):
 - a. Realistic
 - b. Un-compromised
 - c. Located close to actual in-plant locale
 - d. Prepared

ATTACHMENT 6 (Cont)

YES NO/NA

- 9. Have all success paths been identified/addressed?
- 10. Has the simulator run been completed using the final copy of the scenario package?
- 11. Does all data compare with what the simulator will present?
- 12. Are there any data points that should not be used being displayed by the simulator (DRMS, SPDS etc.) if so, note and review during the drill briefing.

Name (print and initial)

Phone Ext.

Date

ATTACHMENT 7: EXERCISE/DRILL OBSERVATION SHEET
(EXAMPLE)

Observers Name: _____

Exercise/Drill Date: _____

Observers Location: _____

Exercise/Drill Title: _____

Time Drill Commenced: _____ Time Drill Terminated: _____

OBSERVATIONS, COMMENTS, AND RECOMMENDATIONS

Page ____ of

NOTE: Observations should include the proper and effective use of procedures, equipment and personnel.

Signature: _____ Title: _____

ATTACHMENT 8

(Example)

**BRIEFING AGENDA
For XX/XX/XX Drill/Exercise**

1. Verify
 - Only controllers, observers, and evaluators are in this briefing
 - All participants aware of their designation (as controller, observer, or evaluator)
2. Scope
3. Enabling Objective Review and Expectations
4. Controller/Observer instructions
 - Expectations
 - Previous drill performance review
 - Pertinent operating experience
5. Scenario summary and timeline review
6. Arrange for time of arrival for Controllers/Observers and Evaluators for day of drill. Allow time (~30 min) for pre-drill Controller briefing.
7. Break out sessions
 - (All facilities): Rad/chemistry data
 - TSC/OSC Damage Control Team scenario data review
 - (EOF dose assessment and Downwind controllers): review near-site and offsite data

• **ATTACHMENT 9: CRITIQUE INSTRUCTIONS FOR THE XX/XX/XX UNIT X DRILL**

(Example)

Facility Critique

Time/Place: In each emergency response facility at the conclusion of play

Attendees: All players, controllers and evaluators (if applicable)

Conducted by: Facility Lead

- EOF...Emergency Director
- TSC...TSC Manger
- OSC...OSC Coordinator
- Simulator...SSS

Instructions:

1. Each facility lead player will lead the facility session
2. At each facility session:
 - Review and compile strengths and opportunities
 - Determine if any objectives were not met
 - Assess ERO readiness as indicated by this drill
3. Each facility lead controller will report on the above during the critique roll-up. Emergency Preparedness will record the results.

•ATTACHMENT 9 (Cont)

(Example)

Roll-up Critique

Time/Place:

Attendees:

Required:

- Facility Lead Controllers
- Facility Lead Players
- Facility Evaluators (if applicable)
- All other interested personnel are invited

Agenda:

- Instructions
- Simulator/Control Room
- TSC Report
- OSC Report
- EOF Report
- Wrap up comments

Instructions:

1. Each facility lead controller will
 - Summarize their facility critique
2. Each facility lead player will:
 - Provide/respond to comments from other facilities
3. The team will determine if Risk Significant Activities were met satisfactory.
4. The team will determine which identified critique items require a DER and assign an individual to write it.
5. Emergency Preparedness will record information
6. EP will collect all remaining paperwork at completion of critique

NINE MILE POINT NUCLEAR STATION
EMERGENCY PLAN MAINTENANCE PROCEDURE

EPMP-EPP-05

REVISION 10

EMERGENCY PREPAREDNESS PROGRAM SELF ASSESSMENT

TECHNICAL SPECIFICATION REQUIRED

Approved by:
G.L. Dettler
G. L. Dettler

James D. [Signature]

Manager Security and Emergency Preparedness

1/9/2004
Date

CONTROLLED

Effective Date: 01/14/2004

PERIODIC REVIEW DUE DATE JANUARY, 2005

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1.0 PURPOSE

This procedure outlines activities to be performed to implement an effective emergency preparedness self-assessment/corrective action program. Consistent implementation of this procedure should ensure regulatory and station requirements are satisfied and conditions adverse to program quality are identified, evaluated and corrected. The objective of this procedure within the emergency preparedness program is to promote continuous improvement.

2.0 PRIMARY RESPONSIBILITY

DIRECTOR EMERGENCY PREPAREDNESS is responsible to ensure:

- Responsible sponsorship for self assessment and benchmark activities
- The self-assessment program routinely strives to identify low-level precursor issues or trends and that early resolution actions are taken before more significant problems occur that can adversely affect plant safety, reliability, or regulatory performance.
- Ongoing self assessments are performed in accordance with the station emergency plan and procedures.
- Periodic focus area assessments are performed that at a minimum meet the requirements of NIP-ECA-05, Focus Self-Assessment and Benchmarking.
- Monthly self-assessment performance indicators are developed consistent with those outlined in NEI-99-02, Regulatory Assessment Performance Indicator Guideline and this procedure.
- Comprehensive program assessments, {e.g. 10CFR50.54(t)} are performed consistent with regulatory requirements.
- Quarterly performance indicators are developed and published as outlined in this procedure.

OPERATING EXPERIENCE ADVOCATE is responsible to:

- Ensure operating experience reviews are performed and documented in accordance with NIP-ECA-06, Operating Experience Program.

3.0 PROCEDURE

3.1 Ongoing Self-Assessments

3.1.1 Drill and Exercises

- a. The Director Emergency Preparedness shall ensure drills and exercises are performed in accordance with EPMP-EPP-04, Emergency Exercise/Drill Procedure.
- b. The Director Emergency Preparedness shall ensure drill and exercise findings that potentially represent conditions adverse to program quality are systematically identified, corrected and evaluated for effectiveness as appropriate and in accordance with NIP-ECA-01, Deviation Event Report.

3.1.2 Operating Experience Review

- a. The Director Emergency Preparedness shall assign an individual to perform the duties of Operating Experience Advocate (OEA).
- b. On a routine basis, The Emergency Preparedness OEA Advocate shall ensure operating experience activities are performed and documented in accordance with NIP-ECA-06, Operating Experience Program.

3.1.3 Emergency Facilities and Equipment

- a. The Director Emergency Preparedness shall ensure facility and equipment surveillance's are performed in accordance with EPMP-EPP-02, Emergency Equipment Inventories and Checklists, EPMP-EPP-03, EDAMS Program Maintenance, EPMP-EPP-06, Emergency Response Organization Notification Maintenance and Surveillance and EPMP-EPP-08, Maintenance, Testing and Operation of the Oswego County Prompt Notification System.
- b. The Director Emergency Preparedness shall ensure surveillance issues that potentially represent conditions adverse to program quality are systematically identified, corrected and evaluated for effectiveness as appropriate and in accordance with NIP-ECA-01, Deviation Event Report.

3.1.4 Emergency Preparedness Documents

- a. The Director Emergency Preparedness shall ensure a systematic review of applicable controlled documents and materials is performed in accordance with EPMP-EPP-01, Maintenance of Emergency Preparedness.
- b. The Director Emergency Preparedness shall ensure applicable controlled document and materials issues that potentially represent conditions adverse to program quality are systematically identified, corrected and evaluated for effectiveness as appropriate, and in accordance with NIP-ECA-01, Deviation Event Report.

3.1.5 Other Ongoing Assessment Techniques

NOTE: The following ongoing self-assessment techniques do not necessarily require formal advance planning or scheduling.

- a. The Director Emergency Preparedness may consider other techniques to assess program effectiveness and where appropriate initiate corrective actions. These techniques may include but are not limited to:
 - Routine Emergency Response Organization (ERO) member interface
 - Management observations of training, drills, exercises

3.1.5.a (Cont)

- Review and analysis of trend information (e.g. emergency equipment reliability issues).
- Corrective action program problem reports
- ERO performance data
- Event investigations
- Benchmarking in accordance with NIP-ECA-05, Focus Self-Assessment and Benchmarking
- Management review meetings

3.1.6 Quarterly Emergency Preparedness Health Indicators

- a. On a quarterly basis the Director Emergency Preparedness shall ensure performance indicators are developed to assess the relative health of the Emergency Preparedness Program using Attachment 5.
- b. Results shall be used to identify trends and areas for focussed self assessment or benchmarking.

3.2 Focus Area Self-assessments

NOTE: Focused self-assessments may be done on a recurring frequency, however, assessments may be initiated in response to situations that warrant a closer review of performance. Focused self-assessment may be triggered by:

- Trends in performance data, or problems tracked in the corrective action program
- Plant events, drills, exercises, training
- Indications of process inefficiencies
- Input from ongoing self-assessment activities or internal or external oversight groups
- Benchmarking activities revealing potential performance issues that warrant a more focused review
- New or revised regulatory requirements
- Significant change initiatives for which an early progress check is needed
- New program implementation, or program or process revision
- Emergent industry issues
- C1 • Emergent industry issues as they relate to the Prompt Notification System (OEs)
- C2 • Contractor oversight as it relates to the PNS

3.2.1 Focus Assessment Activities

The Director Emergency Preparedness shall ensure focused self-assessments are performed in accordance with NIP-ECA-05, Focus Self-Assessment and Benchmarking.

3.2.2 Focus Self-assessment and Benchmarking Plans

Focus self-assessment and benchmarking plans shall be developed consistent with the content and format specified in NIP-ECA-05, Focus Self-Assessment and Benchmarking. This shall include plans that are:

- approved
- critiqued
- planned to ensure key program elements/functional areas are evaluated over a 3 year period
- scheduled

3.2.3 Focus Self-assessment Performance

The Director Emergency Preparedness shall ensure focus self-assessments and benchmarking are performed in accordance with NIP-ECA-05, Focus-Self-Assessment and Benchmarking.

3.2.4 Self-assessment Reports

The Director Emergency Preparedness shall ensure self-assessments reports are prepared in accordance with NIP-ECA-05, Focus-Self-Assessment and Benchmarking. These reports shall be:

- critiqued
- approved
- communicated
- distributed to Senior Managers

3.3 Comprehensive Program Assessment

3.3.1 10CFR50.54(t) Assessment

- a. In accordance with NDD-EPP and 10CFR50.54(t), the Director Emergency Preparedness shall ensure that all program elements are reviewed by persons who have no direct responsibility for the implementation of the emergency preparedness program either at intervals not to exceed 12 months or;
 - as necessary, based on an assessment against performance indicators, and as soon as reasonably practical.
 - after a change occurs in personnel, procedures, equipment, or facilities that potentially could adversely affect emergency preparedness, but no longer than 12 months after the change.
- b. The review shall include an evaluation for adequacy of interfaces with State and County governments and of licensee drills, exercises, capabilities, and procedures.
- c. The results of the review, along with recommendations for improvements, shall be documented, reported to corporate and plant management, and retained for a period of 5 years. The part of the review involving the evaluation for adequacy of interface with State and local governments shall be provided to the appropriate State and local governments.
- d. All elements of the emergency preparedness program as defined in the Station Emergency Plan (SEP) shall be reviewed at least once every 24 months.

3.4 NRC Performance Indicators

3.4.1 Monthly NRC Performance Indicators (Pis) are to be developed as follows:

a. Drill/Exercise Performance Indicator

1. Calculate the Drill/Exercise Performance PI as indicated on Attachment 1.
2. Report data to licensing in accordance with Attachment 4, Emergency Preparedness Cornerstone Data (Licensing Data Submittal Form).
3. Report results of the assessment in accordance with EPMP-EPP-01.

b. Emergency Response Organization Drill Participation

1. Calculate the ERO Drill/Participation PI as indicated on Attachment 2B.
2. Report data to licensing in accordance with Attachment 4, Emergency Preparedness Cornerstone Data (Licensing Data Submittal Form).
3. Report the results of the assessment in accordance with EPMP-EPP-01.

c. Alert and Notification System (ANS) Reliability

1. Calculate the ANS Reliability PI as indicated on Attachment 3.
2. Report data to licensing in accordance with Attachment 4, Emergency Preparedness Cornerstone Data.
3. Report the results of the assessment in accordance with EPMP-EPP-01.

3.5 Corrective Action Program

3.5.1 Issue Identification, Reporting Criteria, Screening

- a. The Director Emergency Preparedness shall ensure emergency preparedness related deviations/events or conditions adverse to quality that have the potential for affecting the safe and reliable operation of Nine Mile Point Units 1 and 2 are entered into the station corrective action program as outlined in NIP-ECA-01, Deviation Event Report.
- b. All Performance Indicator (PI) and self assessment activity results shall be assessed for possible Deviation Event Report (DER) generation in accordance with NIP-ECA-01.

3.5.2 Issue Disposition and Correction

- a. The Director Emergency Preparedness shall ensure DERs assigned to Emergency Preparedness are dispositioned consistent with the requirements of NIP-ECA-01.

4.0 DEFINITIONS

4.1 Performance Indicators (PI):

The Regulatory Oversight Process (ROP) uses PI information, along with results from the reactor inspection program as the basis for assessing plant performance and determining the appropriate regulatory response. The data objectively indicates the performance of Nine Mile Point programs in specific risk significant areas. For Emergency Preparedness the indicators are:

- Drill/Exercise Performance (DEP)
- ERO Drill Participation (ERO)
- Alert and Notification System Reliability (ANS)

4.1.1 Drill/Exercise Performance Indicator (DEP) - The percentage of all drill, exercise and actual opportunities that were performed timely and accurately during the previous eight quarters. This data should be derived from all of the following:

- Actual Emergencies
- Exercises
- Drills that involve any ERO Initial Responders or Emergency Preparedness (EP) Staff

4.1.2 Emergency Response Organization Drill Participation Indicator - Employee Response Organization (ERO) Drill Participation is the percentage the percentage of key ERO members that have participated in a drill, exercise or actual event during the previous eight quarters, as measured on the last calendar day of the quarter. This data should be derived from the following events

- Actual Emergencies
- Exercises
- Drills that involve any ERO Initial Responders or EP Staff

4.1.3 Alert and Notification System Reliability Indicator - Alert and Notification System (ANS) Reliability is the percentage of ANS sirens that are capable of performing their function as measured by periodic siren testing in the previous 12 months. This data should be derived from the following periodic siren testing as defined in EPMP-EPP-08:

- Bi-weekly Tests
- Quarterly Tests
- Annual Tests

4.1.3 (Cont)

- a. Siren Tests - the number of sirens at the site (37 at NMP) multiplied by the number of times they are tested. Example: 37 sirens tested 2 times [by Oswego County Emergency Management (OCEMO)] would equal 74 siren tests. (Use of Intrac and SAMS is considered one test)
- b. Successful Siren Tests - the sum of the sirens that performed their function (as described in EPMP-EPP-08) when tested. Example: If 37 sirens were tested first time by OCEMO and 1 failed, and 37 sirens were tested a second time by OCEMO and 2 failed each time they were tested, the total successful siren tests would be equal to; $36 + 35 = 71$.

5.0 REFERENCES AND COMMITMENTS

5.1 Licensee Documentation

None

5.2 Technical Specifications

None

5.3 Standards, Regulations, Codes

5.3.1 NEI 99-02, Regulatory Assessment Performance Indicator Guideline

5.3.2 NUREG-0654, FEMA-REP-1, Rev. 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants

5.3.3 10CFR50.54t

5.3.4 INPO, Principles for Effective Self-Assessment and Corrective Action Programs

5.3.5 INPO 96-009, Maintaining Emergency Preparedness Manual

5.4 Policies, Programs and Procedure

5.4.1 NDD-ECA, Evaluation and Corrective Action

5.4.2 NIP-ECA-05, Self Assessment

5.4.3 NIP-EPP-01, Emergency Response Organization Expectations and Responsibilities

- 5.4.4 NIP-ECA-06, Operating Experience Program
- 5.4.5 EPMP-EPP-01, Maintenance of Emergency Preparedness
- 5.4.6 EPMP-EPP-02, Emergency Equipment Inventories and Checklists
- 5.4.7 EPMP-EPP-03, EDAMS Program Maintenance
- 5.4.8 EPMP-EPP-06, Emergency Response Organization Notification Maintenance and Surveillance
- 5.4.9 EPMP-EPP-08, Maintenance, Testing and Operation of the Oswego County Prompt Notification System
- 5.4.10 EPIP-EPP-20, Emergency Notifications

5.5 Commitments

<u>Sequence Number</u>	<u>Commitment Number</u>	<u>Description</u>
	1	DER 2003-4154 Development of DEP PI inconsistent with guidelines

6.0 RECORD REVIEW AND DISPOSITION

6.1 The following records generated by this procedure shall be maintained by Records Management for the Permanent Plant File in accordance with NIP-RMG-01, Records Management.

- Attachment 1: Drill/Exercise Performance Worksheet
- Attachment 2A: NEI 99-02 Key ERO Members Worksheet
- Attachment 2B: ERO Drill Participation Worksheet
- Attachment 3: Alert and Notification System Reliability Worksheet
- Attachment 4: Emergency Preparedness Cornerstone Quarterly Reporting Data
- Attachment 5: Quarterly Emergency Preparedness Program Health Performance Indicators

6.1 The following records generated by this procedure are not required for retention in the Permanent Plant File:

None

LAST PAGE

ATTACHMENT 1: DRILL/EXERCISE PERFORMANCE (DEP) WORKSHEET

	Reporting Month or (1,2,3,4) Qtr	Reporting Year
A.	<u>Complete one of these sheets for each event/drill/exercise.</u>	
B.	<u>Enter the Drill/Exercise/Actual Emergency Date:</u>	_____
C.	<u>Determine the following</u>	
	1. Number of Emergency Classification Level (ECL) declaration opportunities: <i>Example: Typical drill, UE, Alert, SAE, GE) would equal 4</i>	_____
	2. Number of ECLs actually declared accurately and timely: <i>Example :If UE was not within require time frame or inaccurate do not count (Ref. EPIP-EPP-01/02)</i>	_____
	3. Number of notification opportunities to the State and County for the initial and subsequent (upgraded) ECLs: <i>Example: For each ECL, a Part 1 should be generated and transmitted</i>	_____
	4. Number of notifications actually made accurately and timely to the State and County for the initial and subsequent ECLs: <i>Example: For each ECL, the Part 1 was accurately generated and transmission started within 15 minutes (Ref. EPIP-EPP-20)</i>	_____
(C1)	5. Number of Protective Action Recommendations (PAR) development opportunities: <i>Example: If a GE was declared, one PAR opportunity is provided. If subsequently a wind shift occurs this would require updated PARs to be developed. The total would then be two.</i>	_____
(C1)	6. Number of PARs developed timely and accurately: <i>Example: If a PAR includes all required areas and includes sheltering recommendation, then this would be 1. If updated PAR identify all areas including the added areas due to wind shift and the sheltering recommendation then this would be 2.</i>	_____
(C1)	7. Number of Protective Action Recommendations (PAR) notification opportunities to be made to the State and county. (including Initial PARs and subsequent PARs): <i>Example: If a GE was declared, a Part 1 should be generated indicating initial PARs and transmitted. Subsequent to the initial PARs additional PARs were made to update the initial PARs, this would indicate that the total should be two.</i>	_____
(C1)	8. Number of PARs actually made to the State and county that were accurate and timely: <i>Example: PAR is accurate on Part 1 and transmission started within 15 minutes following indications that conditions meet PAR threshold.</i>	_____

ATTACHMENT 1 (Cont)

D. Calculate the total for this sheet:

$$\begin{array}{cccccccc} \text{STEP 1} & & \text{STEP 3} & & \text{STEP 5} & & \text{STEP 7} & & \\ \underline{\hspace{1cm}} & + & \underline{\hspace{1cm}} & + & \underline{\hspace{1cm}} & + & \underline{\hspace{1cm}} & = & \underline{\hspace{1cm}} \\ & & & & & & & & \text{Total A} \\ & & & & & & & & \text{next page} \end{array}$$

$$\begin{array}{cccccccc} \text{STEP 2} & & \text{STEP 4} & & \text{STEP 6} & & \text{STEP 8} & & \\ \underline{\hspace{1cm}} & + & \underline{\hspace{1cm}} & + & \underline{\hspace{1cm}} & + & \underline{\hspace{1cm}} & = & \underline{\hspace{1cm}} \\ & & & & & & & & \text{Total B} \\ & & & & & & & & \text{next page} \end{array}$$

ATTACHMENT 2A: ERO DRILL PARTICIPATION WORKSHEET

A. Determine the number of key ERO members requiring biennial drill participation as follows:

1. Determine the name and total number of "active" licensed SSS by contacting each Control Room Clerk for a list of current active SSSs. Place this number in the appropriate block under Step 1 on NEI-99-02 Key ERO Member Worksheet. **Example: Unit 1 has 7 names listed as active SSSs, and Unit 2 has 9 names listed as active SSSs, enter a 16 in the column next to SSS/ED.**
2. Obtain a copy of the ERO Qualification List in effect on the last day of the month.
 - a. Determine number of individuals listed on the ERO Qualification List filling each of the listed key ERO positions. Place this number in the appropriate block under Step 1, Column 1 on Attachment 2A NEI 99-02 Key ERO Members. **Example: TSCM has 4 names listed on the Training Due Report filling that position, enter a 4 in the column next to TSCM.**

B. Determine the number of key ERO members who actually participated in a drill as follows:

1. Obtain a training system report for each facility (TSC, OSC, EOF and Control Room/Simulator) for drills conducted over the past 2 years.
 - The Training Record designator for drills/exercises is :
EP-DRL-(ERF)-0-0-0 Rev 0
 - Note that the Training Record designator for Mini-Drills may change each year.
2. Review the training system report and determine if each ERO person listed on the qualification/training matrix has had a drill within the past two years. Enter the associated number of personnel meeting the drill requirement for each position in Column 2 of Attachment 2A. **Example: If only 3 Offsite Dose Assessment Manager (ODAM) completed the drill requirement in the past two years enter a 3 in Column 2 next to O DAM.**
3. Drill reports and actual event summaries may also be used to satisfy the drill performance requirement.

C. Calculate the data as follows:

1. Place the total number from each column on "Attachment 2B ERO Drill Participation Worksheet" where indicated.
2. Retain copies of all documents used to complete this report in the PI file. Examples of documentation that should be included are: training system reports, and Training Due Reports.

ATTACHMENT 2A (Cont)
 Table 2.1
 NEI 99-02, KEY ERO MEMBERS WORKSHEET

In order to meet the Emergency Preparedness Cornerstone for Emergency Response Organization Drill Participation, the following personnel are considered "Key ERO Members" in accordance with NEI-99-02, Rev. 0 and are required to meet the two-year drill participation requirement:

Key ERO Member as Defined In NEI 99-02	Description from NEI 99-02 (and any supporting notes)	Key ERO Member as Currently exists at 9 Mile Point	# on ERO Roster (Column A)	# Mtg Drill Req. (Column B)
Control Room (CR)				
Shift Manager Emergency Director	Supervision of reactor operations, responsible for reclassification, notification, and determination of protective action recommendations	SSS/Emergency Director (SSS/ED)		
Shift Communicator	Provides initial offsite (state/local) notifications. (This is also the SSSs responsibility at 9 Mile Pt.)	SSS (SSS/ED)	N/A See Above	N/A See Above
Technical Support Center (TSC)				
Senior Manager	Management of plant operations/corporate resources.	Technical Support Center Manager (TSCM)		
Key Operations Support	(No description provided)	Technical Data Coordinator (TDC)		
Key Radiological Controls	Radiological effluent and environs monitoring, assessment, and dose projections.	Radiological Assessment Manager (RAM)		
Key TSC Communicator	Provides offsite (state/local), notification. (9 Mile does not perform this function out of the TSC)	N/A	N/A	N/A
Key Technical Support	(No description provided)	Technical Data Coordinator (TDC)	N/A See Above	N/A See Above
		Nuclear Engineering Design Coordinator (NED)		
Emergency Operations Facility (EOF)				
Senior Manager	Management of Corporate Resources	Emergency Director/Recovery Manager (ED/RM)		
Key Protective Measures	Radiological effluent and environs monitoring, assessment, and dose projections.	Offsite Dose Assessment Manager (ODAM)		
		Dose Assessment Staff		
Key EOF Communicator	Provides offsite (state/local) notifications	Communications Coordinator		
Operational Support Center (OSC)				
Key OSC Operations Manager	(No description provided)	OSC Coordinator		
TOTALS				

ATTACHMENT 2B: ERO DRILL PARTICIPATION WORKSHEET

Reporting Month (1,2,3,4) Qtr	Reporting Year
A. Determine the following:	
1. Current Number of Key ERO responders required to participate in a drill every two years (Total of Attachment 2A, Table 2.1, Column A)	_____
2. Current Number of Key ERO responders required to participate in a drill who have participated in a drill/exercise/actual event during the previous 8 quarters. (Total of Attachment 2A, Table 2.1, Column B)	_____

B. Calculate the following:

Attachment 2A Table 2.1 Column A = _____ X 100 = _____ %
Attachment 2A Table 2.1 Column B ERO PI

Performed by: _____ Date: _____

Verified by: _____ Date: _____

NOTE: SAVE ORIGINALS OR COPIES OF ALL DOCUMENTATION - to be included in the verification documentation.

C. Transcribe the totals of Column A and Column B onto Attachment 4.

ATTACHMENT 3: ALERT AND NOTIFICATION SYSTEM RELIABILITY WORKSHEET

Month _____ (Year) _____

- A. Complete one sheet for each month and indicate above the month and year.
- B. From data submitted by Oswego County Emergency Management determines the following:

1. The number of **bi-weekly** siren tests conducted in accordance with EPMP-EPP-08, Attachment 2.2: _____
2. The number of **quarterly** siren tests conducted in accordance with EPMP-EPP-08, Attachment 3.2: _____
3. The number of **annual** siren tests conducted in accordance with EPMP-EPP-08, Attachment 4.2: _____
4. Number of sirens successfully passing the **bi-weekly** tests in accordance with Table 3.1: _____
5. Number of sirens successfully passing the **quarterly** tests in accordance with Table 3.1: _____
6. Number of sirens successfully passing the **annual** tests in accordance with Table 3.1: _____

Table 3.1: ANS Testing Acceptance Criteria

Bi-Weekly Test	Quarterly Test	Annual Test
<ul style="list-style-type: none"> • SAMS arms, or • Intrac enables on SAMS, or • Locally observed test counter change 	<ul style="list-style-type: none"> • Siren run OK, or • Siren run Intrac, or • Visual observation of siren sounding and rotating for approximately 3 minutes 	<ul style="list-style-type: none"> • Siren run OK, or • Siren run Intrac, or • Visual observation of siren sounding and rotating for approximately 3 minutes

- C. Perform the following calculation using the information above:

$$\text{Step 4} + \text{Step 5} + \text{Step 6} = \frac{\quad}{\text{TOTAL}}$$

$$\quad \times 100 = \quad \%$$

$$\text{Step 1} + \text{Step 2} + \text{Step 3} = \frac{\quad}{\text{TOTAL}}$$

ATTACHMENT 3 (Cont)

D. Using the data from Step C above, and from previous 12 months complete the following table.

	Column A Successful Siren Tests Total = (Step 4+5+6)	Column B Siren Tests Total = (Step 1+2+3)
Current monthly/year		
Month/Year		
Month/Year		
Qtr/Yr. Total of Above		
Month/year		
Month/year		
Month/year		
Qtr/Yr. Total of Above		
Month/year		
Month/year		
Month/year		
Qtr/Yr. Total of Above		
Month/year		
Month/year		
Month/year		
Qtr/Yr. Total of Above		
Total of all Qtrs indicated		

E. Transcribe the totals of Columns A and Column B onto Attachment 4.

F. Using the data from above, complete the following calculation for the 12 month average.

$$12 \text{ month average } \% = \frac{\text{Total Column A}}{\text{Total Column B}} \times 100 \text{ \underline{\hspace{2cm}} \%}$$

ANS PI

Performed by: _____ Date: _____

Verified by: _____ Date: _____

ATTACHMENT 4: EMERGENCY PREPAREDNESS CORNERSTONE QUARTER DATA

(Licensing Data Submittal Form)

Data Reporting Elements	Qtr: Year:	Qtr: Year	Qtr: Year	Qtr: Year	Qtr: Year	Qtr: Year	Qtr: Year	Qtr: Year	TOTAL
Drill/Exercise Performance (DEP)									
Number of classifications, notifications, and PAR development and notifications performed timely and accurately. (Attachment 1, Column A)									
Number of classifications, notifications, and PAR development and notifications opportunities during the reporting quarter. (Attachment 1, Column B)									
ERO Drill Participation (ERO)									
Number of key ERO members at the end of the reporting quarter. (Attachment 2A, Table 2.1, Column A)	Not Applicable								
Total key ERO members that have participated in a drill, exercise or actual event in the last eight quarters (Attachment 2A, Table 2.1, Column B)									
Alert and Notification System Performance (ANS)									
Number of successful ANS siren-tests during reporting quarter (Attachment 3, Column A)	Not Applicable								
Total number of ANS sirens tested during the reporting quarter (Attachment 3, Column B)									

These results were determined using the guidance in NEI 99-02 Rev 0.

Completed by: _____

Verified by: _____

ATTACHMENT 5: QUARTERLY EMERGENCY PREPAREDNESS PROGRAM HEALTH PERFORMANCE INDICATORS SUMMARY

Date: _____

Assessment Period: _____

Evaluator: _____

NOTE: Color indicates relative program effectiveness over the 3 month evaluation period. For indicators of white, yellow or red the summary below shall describe causes and actions taken to correct.

Overall:

AREA A	AREA B	AREA C	AREA D
ERO Drills/Exercise/ Actual Event Performance	Facility and Equipment Reliability	Emergency Preparedness Document Quality	Self-Assessment/ Corrective Action Program Effectiveness
G - W - Y - R	G - W - Y - R	G - W - Y - R	G - W - Y - R

Overall Summary (include a listing of significant events): _____

ATTACHMENT 5 (Cont)
FIGURE 1 - AREA A

- | | | |
|----|--|---------------------|
| A. | Drill/Exercises/Actual Event Performance Criterion Worksheet: | Indicate
Found |
| | 1. Drill/exercise or an actual emergency response was appropriate with no significant human performance problems. | _____ |
| | <ul style="list-style-type: none"> • Green - 2 or less AC DERs where (HP) Human Performance was identified as a causal factor • White - 3-4 AC DERs where HP was identified as an apparent causal factor • Yellow - 5-6 Cat 3 AC DERs where HP was identified as an apparent causal factor • Red - > 6 Cat 3 AC DERs where HP was identified as an apparent causal factor | |
| | 2. Personnel were appropriately trained for the tasks performed. | _____ |
| | <ul style="list-style-type: none"> • Green - 2 or less AC DERs with training as an apparent causal factor • White - 3-4 AC DERs with training as an apparent causal factor • Yellow - 5-6 AC DERs with training as an apparent causal factor • Red - > 6 AC DERs with training as an apparent causal factor | |
| | 3. Drill/exercise/actual event performance did not identify significant recurring problems or a declining trend. | _____ |
| | <ul style="list-style-type: none"> • Green - 0 AC DERs which identify a recurring problem • White - 1-2 AC DERs which identify a recurring problem • Yellow - 3-4 AC DERs which identify a recurring problem • Red - >4 AC DERs which identify a recurring problem | |
| | 4. Station personnel involvement in drill and exercise activities was as required by NIP-EPP-01. | _____ |
| | <ul style="list-style-type: none"> • Green - Less than 2 DERs • White - 2-3 DERs • Yellow - 4-5 DERs • Red - > 5 DERs | |
| | 5. Personnel perform job tasks in accordance with procedures. | |
| | <ul style="list-style-type: none"> • Green - Less than 2 AC DERs • White - 2-3 AC DERs • Yellow - 4-5 AC DERs • Red - > 5 AC DERs | |

AREA A*
Drill/Exercise/ Actual Event Performance
G - W - Y - R

Indicator Summary (provide actions taken to correct as applicable): _____

* Color is based on the most significant color for any of the above criterion (i.e., criterion 3 = yellow and all other criterion are green, indicator color will be yellow)

ATTACHMENT 5 (Cont)
FIGURE 2 - AREA B

- | | <u>Indicate
found</u> |
|--|-----------------------------|
| <p>B. Facility and Equipment Reliability Criterion Worksheet:</p> <p>1. Primary communications systems perform as expected when tested/used.</p> <ul style="list-style-type: none"> • Green - Less than 2 DERs • White - 2-3 DERs • Yellow - 4-5 DERs • Red - > 5 DERs | _____ |
| <p>2. Secondary Communications systems perform as expected when tested/used.</p> <ul style="list-style-type: none"> • Green - Less than 2 DERs • White - 2-3 DERs • Yellow - 3-4 DERs • Red - > 5 DERs | _____ |
| <p>3. Equipment and Facility surveillance's are performed on time and are complete</p> <ul style="list-style-type: none"> • Green - Less than 2 DERs • White - 2-3 DERs • Yellow - 4-5 DERs • Red - > 5 DERs | _____ |
| <p>4. Equipment/Facility deficiencies identified are minor such that they are corrected on the spot, or in a timely fashion.</p> <ul style="list-style-type: none"> • Green - Less than 2 AC DERs • White - 2-3 AC DERs • Yellow - 4-5 AC DERs • Red - > 5 AC DERs | _____ |
| <p>5. Dose Assessment computer operability meets expectations.</p> <ul style="list-style-type: none"> • Green - Less than 2 DERs • White - 2-3 DERs • Yellow - 4-5 DERs • Red - > 5 DERs | _____ |

AREA B*
Facility and Equipment Reliability
G - W - Y - R

Indicator Summary (provide actions taken to correct as applicable): _____

* Color is based on the most significant color for any of the above criterion (i.e., criterion 3 = yellow and all other criterion are green, indicator color will be yellow)

ATTACHMENT 5 (Cont)
FIGURE 3 - AREA C

C. Emergency Preparedness Document Quality Criterion Worksheet:	Indicate # found
1. The Site Emergency Plan and Implementing Procedures are appropriately aligned. <ul style="list-style-type: none"> • Green - 0 DERs • White - 1-2 DERs • Yellow - 3-4 DERs • Red - > 4 DERs 	_____
2. There are no steps in the implementing procedures that if tested would result in an unsafe act or condition or result in inappropriate recommendations for the safety of the public or plant personnel. <ul style="list-style-type: none"> • Green - 0 AC DERs • White - 1-2 AC DERs • Yellow - 3-4 AC DERs • Red - > 4 AC DERs 	_____
3. Job Aids are accurate and appropriately controlled. <ul style="list-style-type: none"> • Green - Less than 2 DERs • White - 2-3 DERs • Yellow - 4-5 DERs • Red - > 5 DERs 	_____
4. Procedure reviews and revisions are performed in accordance with emergency plan maintenance procedures and station procedure control processes. <ul style="list-style-type: none"> • Green - Less than 2 DERs • White - 2-3 DERs • Yellow - 4-5 DERs • Red - > 5 DERs 	_____
5. Procedures are maintained current at the specified locations. <ul style="list-style-type: none"> • Green - Less than 2 DERs • White - 2-3 DERs • Yellow - 4-5 DERs • Red - > 5 DERs 	_____
6. Procedures are adequately comprehensive to effectively address emergency response needs and ensure consistent implementation. <ul style="list-style-type: none"> • Green - Less than 2 AC DERs • White - 2-3 AC DERs • Yellow - 4-5 AC DERs • Red - > 5 AC DERs 	_____
7. Procedures provide appropriate clarity to ensure consistent implementation. <ul style="list-style-type: none"> • Green - Less than 2 AC DERs • White - 2-3 AC DERs • Yellow - 4-5 AC DERs • Red - > 5 AC DERs 	_____

AREA C*
Emergency Preparedness Document Quality
G - W - Y - R

Indicator Summary (provide actions taken to correct as applicable): _____

* Color is based on the most significant color for any of the above criterion (i.e., criterion 3 = yellow and all other criterion are green, indicator color will be yellow)

ATTACHMENT 5 (Cont)
FIGURE 4 - AREA D

- | | <u>Indicate
found</u> |
|---|-----------------------------|
| D. Self-Assessment/Corrective Action Program Effectiveness Criterion Worksheet: | |
| 1. The self-assessment program is administered in accordance with EPMP-EPP-05 and in accordance with station procedures. <ul style="list-style-type: none"> • Green - Less than 2 DERs • White - 2-3 DERs • Yellow - 4-5 DERs • Red - > 5 DERS | _____ |
| 2. The corrective action program is administered in accordance with NIP-ECA-05 and in accordance with station procedures. <ul style="list-style-type: none"> • Green - Less than 2 DERs • White - 2-3 DERs • Yellow - 4-5 DERs • Red - > 5 DERS | _____ |
| 3. Operating Experience database reviews effectively captures events for evaluation and once identified, effectively evaluates issues to prevent the potential for similar occurrence or to address corrective action. <ul style="list-style-type: none"> • Green - Less than 2 AC DERs • White - 2-3 AC DERs • Yellow - 4-5 AC DERs • Red - > 5 AC DERS | _____ |
| 4. Drill/exercise or actual event reports effectively describe issues to ensure they are properly dispositioned <ul style="list-style-type: none"> • Green - Less than 3 DERs • White - 3-4 DERs • Yellow - 5-6 DERs • Red - > 6 DERS | _____ |
| 5. Management monitoring of corrective actions ensures timely correction <ul style="list-style-type: none"> • Green - Less than 3 DERs > 12 months old or having overall due date extended more than once • White - 3-4 DERs > 12 months old or having overall due date extended more than once • Yellow - 5-6 DERs > 12 months old or having overall due date extended more than once • Red - > 6 DERS > 12 months old or having overall due date extended more than once | _____ |

AREA D*
Self-Assessment/ Corrective Action Program Effectiveness
G - W - Y - R

Indicator Summary (provide actions taken to correct as applicable): _____

* Color is based on the most significant color for any of the above criterion (i.e., criterion 3 = yellow and all other criterion are green, Indicator color will be yellow)