



10 CFR 50.54(q)
10 CFR 50, Appendix E

102-06930-JF
August 12, 2014

Palo Verde
Nuclear Generating Station
P.O. Box 52034
Phoenix, AZ 85072
Mail Station 7992
Tel: 623-393-5045

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Sirs:

Subject: **Palo Verde Nuclear Generation Station (PVNGS)**
Units 1, 2, and 3 and Independent Spent Fuel Storage
Installation
Docket Nos. 50-528, 50-529, 50-530 and 72-44
License Nos. NPF-41, NPF-51 and NPF-74
Revision 8 to 16DP-0EP23, Emergency Preparedness
Drill/Exercise Administration

Pursuant to 10 CFR 50.54(q) and 10 CFR 50, Appendix E, Section V, Arizona Public Service Company (APS) is forwarding a copy of Revision 8 to 16DP-0EP23, *Emergency Preparedness Drill/Exercise Administration*, effective July 30, 2014. Also included is a summary of the 10 CFR 50.54(q) analysis for the procedure revision.

APS evaluated the changes incorporated in these revisions, and determined the changes do not reduce the effectiveness of the Emergency Plan and the Plan continues to comply with the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR 50.

In accordance with 10 CFR 50.4(b), copies of this report are being forwarded to the NRC Region IV Administrator and the Resident Inspector.

No commitments are being made to the NRC by this letter.

Should you have any questions regarding this submittal, please contact me at (623) 393-5045.

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102-06930-JF
August 12, 2014
U.S. Nuclear Regulatory Commission
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Sincerely,

Fearn,
Jeff
(Z11307)

Digitally signed by
Fearn, Jeff (Z11307)
DN: cn=Fearn, Jeff
(Z11307)
Date: 2014.08.12
15:49:17 -07'00'

J. Fearn
Emergency Preparedness Manager

DWC/sw

cc:	M. L. Dapas	NRC Region IV Regional Administrator
	B. K. Singal	NRC NRR Project Manager for PVNGS
	M. M. Watford	NRC NRR Project Manager
	G. L. Guerra	NRC Region IV
	M. A. Brown	NRC Senior Resident Inspector for PVNGS
	D. R. Reinert	NRC Resident Inspector for PVNGS
	D. You	NRC Resident Inspector for PVNGS

Enclosure 1 –Revision 8 to 16DP-0EP23, *Emergency Preparedness Drill/Exercise Administration*

Enclosure 2 –Summary of the 10 CFR 50.54(q) Analysis of Revision 8 to 16DP-0EP23, *Emergency Preparedness Drill/Exercise Administration*

Enclosure 1

**Revision 8 to 16DP-0EP23, *Emergency Preparedness Drill/Exercise
Administration***

Emergency Preparedness Drill/Exercise Administration

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Procedure Preparer: Mark Salisbury

Procedure Owner: Angela Krainik

Procedure Usage Requirements

Sections

Information Use:

Refer To 01DP-0AP09,
Procedure and Work Instruction Use and Adherence.

ALL

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1.0 PURPOSE AND SCOPE

1.1 Purpose

- 1.1.1 This procedure provides information for the conduct and administration of an organized drill/exercise program at Palo Verde Nuclear Generating Station (PVNGS). This procedure also describes the interface with onsite and offsite agencies involved with the Palo Verde Nuclear Generating Station drill/exercise program.
- 1.1.2 This procedure supports the Emergency Preparedness Program within the Loss Prevention Program Area.

1.2 Scope

- 1.2.1 This procedure is applicable to personnel involved with the administration of the Palo Verde Nuclear Generating Station drill/exercise program.

2.0 RESPONSIBILITIES

2.1 PVNGS Management

- 2.1.1 Provides personnel to serve as members of the Controller/Evaluator teams and ERO participants to support the Emergency Preparedness program.

2.2 Emergency Preparedness Manager

- 2.2.1 Ensures all program objectives are met within the required frequency.

2.3 Drill Coordinator

- 2.3.1 Coordinates activities associated with the conduct of drills/exercises.
- 2.3.2 Responsible for aspects of the drill/exercise from scenario development through critique and compilation of a drill report.

2.4 Facilities Lead Controller

- 2.4.1 Ensures the safe conduct of the drill/exercise program.
- 2.4.2 Interfaces with other Controllers to resolve any inter-facility questions concerning a drill/exercise scenario.
- 2.4.3 Determines the amount of free play that is permissible on the part of ERO drill participants.



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2.4.4 Ensures issues not identified in a facility critique are entered in the PVNGS Corrective Action Program.

2.4.5 Monitors activities of the Drill Controller, Safety Monitor, Drill Evaluator, and Drill Observer for the facility.

2.5 Drill/Exercise Controller

2.5.1 Delivers verbal drill messages to designated ERO participants at specified times and places during a drill.

2.5.2 Delivers additional contingency messages as may be required to keep a drill action moving according to the scenario time-line and drill objectives.

2.5.3 Functions as Evaluator when needed.

2.6 Safety Monitor

2.6.1 Records drill activities during assembly/accountability drills.

2.7 Drill Evaluator

2.7.1 Evaluates performance based upon guidance found in the PVNGS Emergency Plan, appropriate Emergency Plan Implementing Procedures, Drill/Exercise Objectives, and drill messages.

2.8 ERO Participant

2.8.1 Fills the ERO position for which the individual is trained, or is in training for, or as directed by the EOD/EC.

2.9 Drill Observer

2.9.1 Observes Emergency Preparedness activity without communicating or interfacing with drill participants.

3.0 DEFINITIONS

3.1 **Controller** — Person who provides instruction or messages that controls or directs the flow of the drill scenario. A Controller may also observe participant performance and provide conclusions in regard to participant timeliness and accuracy of the completed tasks.

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- 3.2 **Critique** — A structured post-drill/exercise review session for evaluating organizational response as described in the plans and procedures. Identification of any weaknesses or deficiencies, and recommendations for improvement, are included.
- 3.3 **Drill** — A supervised, planned instruction period aimed at testing, developing, and maintaining individual and integrated capabilities of sections, divisions, agencies, and organizations within the emergency preparedness areas.
- 3.4 **Drill/Exercise Package** — A formatted document that provides the administrative details, written procedures, and technical data necessary to conduct a drill or exercise.
- 3.5 **Excellent** — The performance observed exceeded expectations. The performance observed was superior to the expected performance and specific aspects of the excellent performance should be incorporated into future expectations.
- 3.6 **Exercise** — An evaluated, planned real-time event that tests the integrated capabilities of individuals, sections, divisions, agencies, and organizations within the emergency preparedness areas.
- 3.7 **Not Demonstrated** — The demonstration of objective criteria for a facility was not supported by a drill or the objective was selected to be demonstrated but could not be demonstrated in a facility.
- 3.8 **Not Met** — The demonstration criteria or objective was not performed in an acceptable manner.
- 3.9 **Not Observed** — The performance criteria or objective were not observed by the evaluator/controller.
- 3.10 **Not Selected** — The objective of criteria is not appropriate for the scenario or evaluation. A Not Selected objective or criteria can be indicated by lining out and marking the line-out with NS.
- 3.11 **Satisfactory** — Performance meets expectations. Procedures were followed and individuals demonstrated competency in performing assigned tasks.
- 3.12 **Satisfactory With Opportunity For Improvement** — The demonstration criteria or objective was successfully demonstrated in the drill/exercise but opportunities for improvement were noted. This should be the expected standard for most drill performance.
- 3.13 **Scenario** — An outline of events used to control a projected course for drills or exercises.

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- 3.14 **Scenario Development Team** — A team of PVNGS Site personnel and other persons representing the affected emergency organization.
- 3.15 **Strength** — Performance exceeds satisfactory expectations. Procedures were followed and individuals demonstrated high competency in performing assigned tasks with innovative methods.
- 3.16 **Table Top Drill** — A controlled instruction period aimed at training and challenging individual and integrated capabilities of specific groups or sections in a facility setting such as the TSC, OSC, EOF, or JIC.
- 3.17 **Weakness** — Performance weaknesses or deficiencies were observed in the drill or exercise. The overall completion of the criteria or objective was marginally met.

4.0 INSTRUCTIONS

4.1 Drill Scheduling and Performance Indicators

NOTE

Appendix A - Sample Annual Drill/Exercise Schedule contains a representative schedule.

- 4.1.1 Prior to the end of the year, prepare an Annual Drill/Exercise schedule for the upcoming year.

- 4.1.1.1 Include drills/exercises that are included in the NRC Drill and Exercise Performance Indicators.

- a. Schedule and communicate drills containing Performance Indicator opportunities to the NRC prior to performance of the opportunity.

NOTE

Specific dates and times for unannounced drills should not be published in the notification to site management.

- b. Notify appropriate site management of drills containing Performance Indicator opportunities.
- 4.1.1.2 Use Appendix C - Required Drill/Exercise Frequency as a guide for determining drill/exercise frequency.



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- 4.1.1.3 Use drill and exercise scenarios to provide reasonable assurance that anticipatory response(s) will not result from preconditioning of participants.
- 4.1.1.4 When necessary, schedule table top drills for applicable Emergency Response Organization personnel and Emergency Response Facilities to focus on areas of weakness identified in drills (including other table tops), exercises, or industry events.
- 4.1.2 If any deviations occur to the list of drills or simulator evaluations included in the Drill and Exercise Performance Indicators, then perform the following:
- 4.1.2.1 Revise drill schedule.
- 4.1.2.2 Document change and basis for the change in a letter to file.
- 4.1.2.3 Ensure the change is available for NRC review.
- 4.1.2.4 Provide the NRC with an updated drill schedule.

NOTE

Drill and Exercise Performance data is collected from pre-identified activities and is based on evaluations of the following event opportunities:

- Actual Emergency Declarations
- Biennial Exercises
- Full-Scale Drills
- TSC Table-Top Drills
- EOF Table-Top Drills
- Operations Simulator Drills (LOCT)
- Licensed Operator Requalification Exams
- Licensed Operator Initial Training

- 4.1.3 If Drill and Exercise Performance Data will not be collected in a pre-identified activity, then, prior to the conduct of the pre-identified activity, document that Drill and Exercise Performance Data will not be collected.

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4.2 Drill Objectives and Evaluations

NOTE

Drills and exercises should be measured for success based on established primary objectives selected from the Master Objectives Database list.

- 4.2.1 Perform trending of drill objective performance using CAP, Performance Indicators, or other suitable method to facilitate identifying areas where drill performance needs to be improved.
- 4.2.2 Evaluate drills and exercises per the primary objectives and the corresponding sub-objectives using the applicable demonstration criteria as a guide in the Master Objectives Database.
 - 4.2.2.1 Submit a PVAR to document any objective graded as weak or not met (UNSAT).
- 4.2.3 Evaluators shall evaluate performance based upon guidance found in the Emergency Plan, appropriate Implementing Procedures, Drill/Exercise Objectives, and drill messages.

NOTE

Evaluators may also be Controllers.

- 4.2.3.1 Each evaluator should maintain an on-going record (chronology) of significant events as the events occur.
- 4.2.4 Controllers and evaluators will assess ERO participant response and performance on the basis of Objectives, Emergency Plan, supporting procedures, Federal Regulations and guidance documents.
- 4.2.5 When evaluating success or failure of timeliness for rapidly escalating reclassifications, then utilize one of the following RIS 2007-02, Clarification of Emergency Notification Changes, protocols:



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NOTE

In Step 4.2.5.1 only one Drill and Exercise Performance notification opportunity exists. The first classification notification would not be counted as an opportunity in Drill and Exercise Performance.

- 4.2.5.1 If plant conditions degrade, and if a higher classification emergency is declared before notifications are made for a lesser emergency declaration, then perform the following:
- a. Update the notification to reflect the higher emergency classification.
 - b. Complete updated notifications within 15 minutes of the lesser notification opportunity.

NOTE

Since Offsite Response Organizations will take actions consistent with higher emergency classification, identification of the lesser emergency classification in the updated notification is not necessary. If still present, the plant condition that gave rise to the lesser emergency classification should be identified in follow-up notifications.

NOTE

The notification could contain the caveat that a change in classification was forthcoming.

NOTE

If the protocol of 4.2.5.2 is used, there are two Drill and Exercise Performance notification opportunities.

- 4.2.5.2 If notification cannot be updated and completed within 15 minutes of a lesser emergency declaration, then the Emergency Response Organization shall make the notification within 15 minutes of the declaration of the lesser emergency.
- a. In parallel, prepare the notification for the higher emergency classification and make an additional notification within 15 minutes of higher emergency declaration.

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The notification could contain the caveat that a change in classification was forthcoming.

NOTE

If the protocol of 4.2.5.3 is used, there are two Drill and Exercise Performance notification opportunities.

- 4.2.5.3 If notifications are made serially, and if notifications for a lesser emergency declaration are in progress when an escalation is declared, then complete the remaining notifications so that all OROs have the same classification information.
- a. In parallel, prepare the notification for the higher emergency classification and make an additional notification within 15 minutes of higher emergency declaration.

- 4.2.6 If an emergency is classified differently than stipulated in a drill scenario, then evaluators must perform the following for the opportunity to be considered a success:

- 4.2.6.1 Document the rationale for why the classification is appropriate to the event.
- 4.2.6.2 Specify how the classification is consistent with the Emergency Plan and Implementing Procedures.
- 4.2.6.3 Initiate a PVAR to address Scenario deficiencies.

NOTE

Classifications conducted off-line, at the request of the instructor/evaluator, should not be included in the performance indicator reporting.

- 4.2.7 If a Shift Manager has an active NRC SRO License, and if a classification is performed in real-time as defined in the drill scenario, then Operator Simulator Evaluations with classification opportunities may be included in the performance indicator reporting.



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NOTE

Classification accuracy can be determined by reviewing the correct classification level, classification time, and EAL indicated on the NAN Form.

- 4.2.8 Determine classification success based on the time a classification was made and the classification accuracy.

NOTE

Other elements on the NAN Form support the determination of the accuracy of the notification Drill and Exercise Performance opportunity if evaluated on the simulator.

- 4.2.8.1 If notification is not evaluated or counted during a simulator evaluation, then critique and address errors with additional elements on the NAN Form through remedial training and coaching.
- 4.2.8.2 When used for notification Drill and Exercise Performance opportunities, then ensure all NAN Forms completed in the simulator are marked "This is a Drill."

- 4.2.9 Document and maintain evaluation information and classification/PAR and NAN Forms for notification results per 93DP-0LC09, Data Collection and Submittal Using INPO's Consolidated Data Entry System.

- 4.2.10 Maintain completed NAN Forms used during Drill and Exercise Performance opportunities as part of the quarterly Drill and Exercise Performance documentation.

4.3 Drill Controller/Evaluator Organization

- 4.3.1 The Lead Drill Coordinator must approve any deviation from the time line or use of a contingency message prior to issuing to an ERO participant.
- 4.3.2 If a Controller intervenes with the performance of an individual to make an independent and correct classification, notification, or Protective Action Recommendation, then consider the Drill and Exercise Performance opportunity as a missed (failed) opportunity.



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4.4 Drill and Exercise Administration

4.4.1 Any electronic files containing scenario information shall be located in a folder confirmed to have limited access or is password protected. Simulator scenarios shall be saved to a removable media device and shall not be saved in the simulator hard drive.

4.4.2 Maintain drill security at all times.

4.4.2.1 Provide physical control of the drill information or secure the information in a desk, file cabinet, or locked room with limited access.

4.4.2.2 Ensure personnel who assist with drill development are not allowed to be drill participants.

4.4.2.3 Ensure personnel who participate in drill development and controller duties are briefed on the expectations for maintaining drill security.

NOTE

The format for the critique process is defined in Appendix B - Critique Process.

4.4.3 Ensure an In-Facility Self Critique is held following each plant drill.

NOTE

Controllers may provide documented observations to the Lead Facility Controller following the In-Facility Self Critique.

4.4.3.1 Ensure the In-Facility Self Critique includes comments from the drill participants.

4.4.3.2 Ensure all actual emergency declarations are critiqued against 10 CFR 50.47, 10 CFR 50 Appendix E Planning Standards, and the PVNGS Emergency Plan and Implementing Procedures.

a. Provide the number of timely and accurate classifications, notifications, and Protective Action Recommendations in the content of the post-event Emergency Preparedness Critique and subsequent event report.

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- b. Maintain completed Emergency Preparedness forms that support the conclusions of the critique and event report per 93DP-0LC09, Data Collection and Submittal Using INPO's Consolidated Data Entry System.

4.4.4 Ensure a Lead Controller Critique is scheduled for all large-scale drills and exercises.

4.4.4.1 The Lead Facility Controller shall ensure that forms, notes, and marked up procedures used during the drill along with Controller/Evaluator notes developed in the course of the drill are available for the Lead Controller Critique.

4.4.4.2 The Emergency Preparedness Manager or designee shall contact state and local agencies to receive feedback on offsite drill issues as appropriate for incorporation into the Lead Controller Critique.

4.4.5 For NRC Evaluated Exercises, Emergency Preparedness Manager or designee shall present the drill findings to Senior Management prior to the NRC exit.

4.4.6 Ensure drill results are independently reviewed.

4.4.6.1 Ensure the number of timely and accurate classifications, notifications, and Protective Action Recommendations is included in the drill package and in the content of the exercise, drill, or table-top drill report documentation.

NOTE

A drill or exercise report may be amended or revised to include issues not previously identified.

4.4.7 Ensure a drill report is issued within 4 weeks following completion of the drill or exercise.

4.4.8 The Emergency Preparedness Manager or designee shall review and approve the Drill Report.

4.4.8.1 Ensure the number of timely and accurate classifications, notifications, and Protective Action Recommendations is documented in the Drill/Exercise report generated following the Drill/Exercise.



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- 4.4.9 Maintain completed Emergency Preparedness forms that support the conclusions of the drill/exercise report per 93DP-0LC09, Data Collection and Submittal Using INPO's Consolidated Data Entry System.

4.5 Key ERO Participants

NOTE

The Emergency Response Organization Drill Participation Indicator measures the percentage of Key ERO Members who have participated recently in proficiency-enhancing drills, exercises, training opportunities, or in an actual event during the previous eight (8) quarters, as measured on the last calendar day of the quarter.

- 4.5.1 Drill and Exercise Performance participation may be satisfied as a participant, mentor, coach, evaluator, or Controller, but not as an observer. ERO Drill Participation is only credited when Drill and Exercise Performance is being evaluated.
- 4.5.1.1 A participant is the person that directly participates in the key ERO position.
- 4.5.1.2 A mentor is a person who is usually more experienced than the participant and acts in a coaching or instruction capacity. A mentor is not used during an NRC evaluated exercise.
- 4.5.1.3 A coach is the same as a mentor. A coach is not used during an NRC evaluated exercise.
- 4.5.2 Multiple assignees to a given Key ERO Position may take participation credit for the same drill if participation represents a meaningful opportunity to gain proficiency in the assigned position. Examples in which multiple persons may receive credit for participation are as follows:

Facility	ERO Position
CR	Emergency Coordinator
TSC	Emergency Coordinator
TSC	Operations Manager
TSC	Radiological Protection Coordinator
TSC	Engineering Manager
OSC	OSC Manager

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Facility	ERO Position
EOF	Emergency Operations Director
EOF	Assistant Emergency Operations Director
EOF	NAN Communicator
EOF	Radiological Assessment Coordinator

- 4.5.2.1 Key ERO Member Participant, Mentor, Coach, Evaluator, or Controller.
- 4.5.2.2 The Emergency Coordinator and Emergency Coordinator Controller or Evaluator may both take credit for the Emergency Coordinator position during the same drill.
- 4.5.3 Drills performed by an individual before being assigned to a Key ERO Position may be counted after the individual is assigned to the ERO as long as the performance enhancing experience contributes to the Drill and Exercise Performance Metric.
- 4.5.4 Security (Hostile Action Based) drills as defined in NEI 06-04, Conducting A Hostile Action Based Emergency Response Drill, Rev. 1 will maintain separate tracking of participation credit per NEI 99-02.
- 4.5.4.1 Participation for a security (Hostile Action Based) drill can only be given once every 8 years.
- 4.5.4.2 Credit can be given to key ERO participants for a security (Hostile Action Based) drill as long as the Key ERO Positions are observed evaluating the need to upgrade to the next higher classification level or evaluating a PAR.
- 4.5.4.3 Communication credit can be given to Key ERO Positions as long as the position performs a minimum of one offsite updated notification.

5.0 REFERENCES

5.1 Implementing References

- 5.1.1 None

5.2 Developmental References

- 5.2.1 Developmental References are listed in the Basis Document.



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6.0 RECORDS

6.1 The following record is generated by this procedure:

6.1.1 Record name: Drill Report

- Classification: Good Business Practice
- Retention: 10 years plus insurance
- Turnover instruction: CORR



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Appendix A - Sample Annual Drill/Exercise Schedule

DATE	EVENT	COMMENTS
1st Quarter		
TBD	Fire Department Drills (12)	Ops / PI
Unannounced	Assembly/Accountability	Site
Week of January 12	OPS Cycle 1 Training	Ops / PI
Week of January 19	OPS Cycle 1 Training	Ops / PI
Week of January 26	OPS Cycle 1 Training	Ops / PI
Week of February 2	OPS Cycle 1 Training	Ops / PI
Week of February 9	OPS Cycle 1 Training	Ops / PI
January 30	Drill Controller Meeting	All Drill Controllers
February 4	Pre-Exercise Full Scale	INPO Review Visit/PI - GREEN Team
Week of February 23	OPS Cycle 2 Training	Ops / PI
Week of March 2	OPS Cycle 2 Training	Ops / PI
Week of March 9	OPS Cycle 2 Training	Ops / PI
Week of March 16	OPS Cycle 2 Training	Ops / PI
Week of March 23	OPS Cycle 2 Training	Ops / PI
February 27	Drill Controller Meeting	All Drill Controllers
March 4	Evaluated Full Scale Exercise	NRC / PI - GREEN Team
2nd Quarter		
April 4 – May 18	3R14 Outage	
Week of May 25	OPS Cycle 3 Training	Ops / PI
Week of June 1	OPS Cycle 3 Training	Ops / RED Team / PI
Week of June 8	OPS Cycle 3 Training	Ops / WHITE Team / PI
Week of June 15	OPS Cycle 3 Training	Ops / BLUE Team / PI
Week of June 23	OPS Cycle 3 Training	Ops / GREEN Team / PI
3rd Quarter		
Week of July 20	Unannounced Day Shift Drill	TSC/OSC/EOF
TBD	Practice Tabletop Hostile Action Drill	Onsite and Offsite Personnel
Week of August 24	OPS Training EXAM Cycle	Ops / PI
Week of August 31	OPS Training EXAM Cycle	Ops / PI
Week of September 7	OPS Training EXAM Cycle	Ops / PI
Week of September 14	OPS Training EXAM Cycle	Ops / PI
Week of September 21	OPS Training EXAM Cycle	Ops / PI
September 18	Drill Controller Meeting	All Drill Controllers
September 23	Pre-Exercise Hostile Action	Table Top – RED Team
4th Quarter		
Oct 3 – Dec 1	2R15 Outage	
Week of November 16	OPS Cycle 5 Training	Ops / PI
Week of November 23	OPS Cycle 5 Training	Ops / PI
Week of November 30	OPS Cycle 5 Training	Ops / PI
Week of December 7	OPS Cycle 5 Training	Ops / PI
Week of December 14	OPS Cycle 5 Training	Ops / PI
December 4	Drill Controller Meeting	All Drill Controllers
December 10	Evaluated Exercise Hostile Action	Full Scale Exercise – WHITE Team
TBD	HP Drill – First Half of Year	EP/RP/OPS
TBD	HP Drill – Second Half of Year	EP/RP/OPS

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Appendix B - Critique Process

B.1 IN-FACILITY SELF CRITIQUE

B.1.1 The Lead Facility Manager with assistance from the Lead Facility Controller in each Emergency Response Facility will conduct a post drill critique following each drill.

B.1.1.1 Set the time for the start of the critique.

B.1.1.2 Identify a critique recorder.

B.1.2 All participants are expected to attend and actively participate in the critique.

B.1.3 The recorder will keep detailed notes for the critique using the guide in this appendix. Comments should identify the name and the role of the commentator.

B.1.4 Using the following list as a guide, the Lead Facility Manager will conduct the critique by open discussions and soliciting participant comments for each of the performance areas listed in this appendix. Special attention should be made to the Risk Significant Planning Standards focusing on Classification, Notification, Protective Action Recommendations and Radiological Assessment. As applicable, the following issues will be discussed in the critique of each emergency response facility:

- Notification of ERO
- Activation
- Classification
- Notification of State/Counties/NRC
- Protective Action Recommendations
- Radiological Release Assessments
- Command and Control
- Assembly, Accountability
- Briefings
- Resources
- Staffing

- Equipment Problems
- Procedure Issues
- Drill Scenario and performance objectives/criteria
- Use of Human Performance tools
- Other Pertinent Issues

B.1.5 Discuss whether there were barriers to the performance of certain tasks and assure that barriers are identified. Also identify any good practices used that resulted in expectations being exceeded.

B.1.6 The facilitator should allow an opportunity for comments for all participants for items to be identified that were not captured by task in the critique.

B.1.7 The Lead Facility Controller and other facility controllers should critique what was not discussed, including clarification of an issue, after the participants have an opportunity to comment.

B.1.8 Emergency Response Facility Controllers should then perform a post drill review of the drill critique process. Compare the known scenario anomalies to the controller/participant identified anomalies. A document containing all findings/concerns from the Emergency Response Facility shall be developed and provided to the Lead Drill Controller at the Lead Controller Critique.

B.2 LEAD CONTROLLER CRITIQUE

B.2.1 For large scale drills and exercises the Drill Coordinator should establish a time for a Lead Controller Critique.

B.2.2 Lead Emergency Response Facility Controllers should attend the Lead Controller Critique. They should bring the consolidated Emergency Response Facility objective master, recorders notes, as well as notes and or comments from the Controllers and Evaluators in their respective Emergency Response Facilities.

B.2.3 The purpose of the Lead Controller Critique is to:

B.2.3.1 Consolidate comments from each Emergency Response Facility by objective using the Master Objective Database.

B.2.3.2 Identify:

- Any objective standard graded less than satisfactory.

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- Unsuccessful NRC Performance Indicator opportunities.
- Issues that would result in a White or Yellow finding using the Emergency Preparedness Significance Determination Process
- Failure to use appropriate Human Performance Tools
- Major equipment problems.
- Procedure non-compliance affecting the outcome of the task.
- Findings issued by nuclear oversight, NRC or other governmental or external oversight organization.
- Scenario or conduct of drill issues that impeded the Emergency Response Organization participants from meeting an objective standard.
- Recurring issues.
- Other issues that may require management attention, or need to be tracked or trended.
- Strengths. (A process, program, activity or condition that is exceeding industry expectations and has resulted in improved safety, quality, or reliability.)

B.2.3.3 Verify that each objective for the Emergency Response Facilities provides adequate guidance to controllers to make determinations whether the objective demonstration was Satisfactory, Satisfactory: With Opportunity for Improvement, Not Demonstrated, Not Observed, Not Met, Strength, Weakness.

B.2.3.4 Consolidate and assess drill data that is input for NRC Performance Indicators.

B.2.3.5 Document adverse conditions in the Corrective Action Program.

Emergency Preparedness Drill/Exercise Administration

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Appendix C - Required Drill/Exercise Frequency

The required frequency of Drills, Exercises and Objectives are derived from NUREG 0654/FEMA, REP 1, Rev 1, and Supplements 1 and 3 and the PVNGS Emergency Plan.

Required Drills and Exercises	Participants	Frequency
Radiation Monitoring/Environs Drill	Palo Verde	Annual
Medical Drill	Palo Verde/FEMA/Hospital	Annual
Site Assembly/Accountability	Palo Verde	Annual
Communications Drill	Palo Verde	Annual
Off-hours Drill (Call in)	Palo Verde	Quarterly
Health Physics Drill	Palo Verde	Semi- annually
Plume Exposure Pathway (EPZ) Evaluate Exercise (Full Participation)	Palo Verde/MCDEM/FEMA/ NRC/State/ARRA	Biennial
Pre Exercise Drill (Dress Rehearsal)	Palo Verde/State/ARRA	Biennial
Off-hours Augmentation Drill (Drive in) (Begin between 1800-1200 one year and 1200-0600 the next)	Palo Verde	Biennial
Ingestion Pathway Exercise (IPX)	Palo Verde/MCDEM/ARRA	6 years
Unannounced Drill	Palo Verde	6 years
Recovery Operations	Palo Verde	6 years
Joint Information Center	Palo Verde	6 years
Rumor Control	Palo Verde	6 years
KI Distribution	Palo Verde	6 years
Fire Response Drill	Palo Verde	6 years
First Aid/Rescue Team (Search and Rescue)	Palo Verde	6 years
Backup Communications	Palo Verde	6 years
Emergency Power	Palo Verde	6 years
Shift Change	Palo Verde	6 years
Severe Accident Management Guidelines (SAMG) Drill	Palo Verde	6 years
Aircraft Threat Drill	Palo Verde/MCDEM/FEMA/ NRC/State/ARRA	8 years
Hostile Action Based (HAB) Drill	Palo Verde/MCDEM/FEMA/ NRC/State/ARRA	*8 years

Note - The eight year cycle starts with the first NRC/FEMA Evaluated Hostile Based exercise between 2012 and 2015.

Electronic Procedure Change Record

Procedure No.: (1) 16DP-0EP23		Revision No.: (2) 008	Category: (3) 2	Expedite? (4) No
Title: (5) Emergency Preparedness Drill/Exercise Administration				
Procedure Action: (6) Minor	Full Basis Check? (7) No	NAD Review: (8) No	PRG Review: (9) No	Upgraded Procedures: (10) Yes
EOP? (11) No	Dry Cask? (12) No	Decommissioning Doc? (13) No		
AD Review: (14)	10CFR50.59/72.48 Required? (15) No	50.59/72.48 Doc Number:		
<p>This procedure describes changes that are administrative in nature and do not establish an expanded definition, or alter the design, of the facility, nor do they alter the method of operating or controlling the facility. Therefore, per 93DP-0LC07-01 Rev. 1, Step 5.2.3, no further review is required.</p> <p>Per 93DP-0LC07-01 Rev.1 Step 5.3.14, 10 CFR 50.54(q) specifies criteria and reporting requirements for changing Emergency Plans. A 50.54(q) review was completed.</p>				
Text does not automatically roll to continuation page. AD Review - Continuation (16) <input type="checkbox"/> Yes				
Applicability Determination performed by: (17) Rebecca Richey				
Is Environmental Screening Required?: (18) <input checked="" type="checkbox"/> No (done) <input type="checkbox"/> Yes <input type="checkbox"/>		Env. Reg./Permit Review req'd? <input checked="" type="checkbox"/> No (19) <input type="checkbox"/> Yes <input type="checkbox"/> (Use 91DP-0EN02, App. A) Screening performed by:		
If "Yes" send 91DP-0EN02, Appendix A to Environmental (20) Scrn Log Number:				
Procedure Preparer: (21) Richey, Rebecca A(Z60142) <small>Digitally signed by Richey, Rebecca A(Z60142) DN: cn=Richey, Rebecca A(Z60142) Date: 2014.07.25 14:21:13 -07'00'</small>		IQR Approval Recommendation: (22) Pierce, Wayne D(Z07235) <small>Digitally signed by Pierce, Wayne D(Z07235) DN: cn=Pierce, Wayne D(Z07235) Date: 2014.07.25 14:22:44 -07'00'</small>		
NAD Concurs (if required): (23)		PRG Concurs (if required): (24)		
Approval: (25) Krainik, Angela K(V21680) <small>Digitally signed by Krainik, Angela K(V21680) DN: cn=Krainik, Angela K(V21680) Reason: I am approving this document Date: 2014.07.25 14:59:25 -07'00'</small>		Effective Date (Time Optional): (26) 07/30/2014		
Summary of Change (include list of all PCRs incorporated): (27) Incorporated the following PCR: Pri-4 PCR # 4504967: addressed. Added new step 4.4.1, "4.4.1 Any electronic files containing scenario information shall be located in a folder confirmed to have limited access or is password protected. Simulator scenarios shall be saved to a removable media device and shall not be saved in the simulator hard drive." Removed NOTE, "The electronic file containing scenario information is in the EP folder, which has limited access or is password protected."				
Text does not automatically roll to continuation page. Change Summary - Continuation (28) <input checked="" type="checkbox"/> Yes				

Enclosure 2

**Summary of the 10 CFR 50.54(q) Analysis of
Revision 8 to 16DP-0EP23, *Emergency Preparedness Drill/Exercise
Administration***

Summary of Analysis of Revision 8 to 16DP-0EP23, Emergency Preparedness Drill/Exercise Administration

The major change to this procedure is included in this Summary. Minor changes, such as editorial or typographical, are included in the 50.54(q) Evaluation retained at Palo Verde Nuclear Generating Station.

The first NOTE in Section 4.4, *Drill and Exercise Administration*, (Revision 7) was deleted. The note read as follows:

“NOTE: The electronic file containing scenario information is in the EP folder, which has limited access or is password protected.”

The substance of the deleted note was changed into a new Step 4.4.1, in Revision 8, as follows:

“4.4.1 Any electronic files containing scenario information shall be located in a folder confirmed to have limited access or is password protected. Simulator scenarios shall be saved to a removable media device and shall not be saved in the simulator hard drive.”

This change relocates an expected action from a ‘note’ to a ‘step’ that conforms to site procedure writing standards. The change also clarifies requirements for maintaining scenario confidentiality of simulator scenario files. The change does not reduce the effectiveness of the emergency plan because it clarifies and/or adds administrative controls to drill material.

Conclusion

The actions described within this Summary do not constitute a Reduction in Effectiveness to the PVNGS Emergency Plan. The proposed changes continue to meet the standards in 10 CFR Part 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.