

Enclosure 2

Handouts discussed during the June 17, 2015 ROP WG Public Meeting

Issue

NEI 99-02, page 56, lines 28 to 37, allows sites to grant participation credit to Key Positions in the TSC and EOF for a Hostile Action Based (HAB) Drill/Exercise when the positions are not afforded the opportunity to perform DEP.

However in some instances, the Drill/Exercise is designed so that Key Positions in the TSC or EOF are afforded the opportunity to perform DEP. In this case the page 54 clarification is not required and the criteria of the third and fourth sentence do not apply to the Drill/Exercise.

Confusion exists on the above point. Therefore, the below clarification is recommended to NEI 99-01R8.

Current

NEI 99-02, Page 56, Lines 28 - 37

Credit can be granted to Key Positions for ERO Participation for a Security related Drill or Exercise as long as the Key Positions are observed evaluating the need to upgrade to the next higher classification level and/or evaluating the need to change protective action recommendations. Key TSC Communicator and Key EOF Communicator may be granted participation credit as long as the Key Position performs a minimum of one offsite (state/local) update notification. If an individual participates in more than one Security-related Drill/Exercise in a three year period, only one of the Security-related Drills/Exercise can be credited. A station cannot run more than one credited Security-related Drill/Exercise in any consecutive 4 quarter period. Objective evidence shall be documented to demonstrate the above requirements were met.

Mark-up

Some Hostile Action-Based (HAB) drills or exercises may have all DEP indicator opportunities performed in the Control Room (e.g., initial declaration of a Site Area Emergency with escalation to a General Emergency prior to activation of ERO facilities), while others could have initial opportunities performed in the Control Room and subsequent opportunities performed in the TSC and/or EOF. For key ERO positions that normally perform a DEP indicator opportunity, the following guidance should be used to assign ERO Participation indicator credit resulting from participation in an HAB drill or exercise.

Key ERO Position	Drill Scenario Did Provide a DEP Opportunity for this Position	Drill Scenario Did NOT Provide a DEP Opportunity for this Position
<ul style="list-style-type: none"> • TSC Senior Manager • EOF Senior Manager 	Count ERO Participation per normal practice	Count ERO participation provided that the position was observed evaluating the need to upgrade to the next higher emergency classification level
Key TSC and EOF positions responsible for developing PARs	Count ERO Participation per normal practice	Count ERO participation provided that the position was observed evaluating the need to change protective action recommendations
<ul style="list-style-type: none"> • Key TSC Communicator • Key EOF Communicator 	Count ERO Participation per normal practice	Count ERO participation provided that the position performed at least one update notification to OROs

For HAB drills and exercises involving no DEP opportunities in the TSC and EOF:

- An individual may receive ERO Participation indicator credit only once during a three-year period.
- Only one HAB drill/exercise may be credited for ERO Participation indicator purposes in any consecutive 4-quarter period.

There is no credit limitation on HAB drills and exercises that include DEP opportunities in the TSC and/or EOF; ERO participation credit should be assigned in the normal manner for these drills and exercises. Objective evidence shall be documented to demonstrate the above requirements were met.