

Industry Questions on Table B-1

1. A review of the “Emergency Preparedness Functions” as outlined in column 1 of Table B-1 includes items associated with:
 - Command and Control (Command and Control, Communications, Dose Assessment, Emergency Classifications)
 - Event Assessment (Field Monitoring, Engineering, Radiation Protection, Security)
 - Event Mitigation (Repair Team Activities, Engineering)
 - Oversight (Supervision of Radiation Protection, Supervision of Repair Team Activities)
 - Other (Media Information, Information Technology)

What is the purpose of Revision 2 of Table B-1 and what is the intent of modifying the bases from the current Table B-1?

2. What is the technical basis associated with the functions, number, and response times associated with Table B-1.
 - What is the technical basis for the 60 and 90 minute response times listed in Table B-1
 - What is the basis for the numbers indicated in the On-Shift column under Emergency Classifications
3. The Security Function augmentation column provides for a Security Supervisor to be augmented in the TSC. What is the basis for this augmented position beyond that of the role of the on-shift security supervisors?
4. IT support is normally provided on an as-needed basis for emergent equipment issues which will typically be handled remotely by a licensee's IT support staff. What is the basis for IT being added to Table B-1?
5. What is the basis for the number and qualifications for RP related functions?
 - RP surveys outside of plant buildings and within the Protected Area have been historically performed by technicians dispatched from the OSC and are sometimes referred to as ‘onsite survey teams’. Surveys completed outside the Protected Area are often completed by ‘offsite field monitoring teams’. Given the new definition of ‘onsite’ as “the OCA [Owner Controlled Area] of a commercial NPP”, please explain the anticipated interaction of these functions going forward.
 - The table indicates there are 6 HP Technicians required for the OSC. The description of the Emergency Functions these individuals provide includes in-plant surveys, onsite surveys, and offsite surveys. Later in the table there is a line item for Field Monitoring Teams, one for onsite surveys and two for offsite surveys. Can you explain the difference between the two functions...the onsite and offsite survey function assigned to the OSC staff and the field team function which also is assigned onsite and offsite survey function.

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- What is the basis for 6 augmented HP Technicians for job coverage and in plant surveys? With improved technologies for self-reading dosimetry, in plant radiation monitoring, radiation worker training etc., why would it be necessary to have approximately 1 HP Technician for every 1.5 in field emergency responder (Maintenance, Operations and Chemistry)?
 - Under the radiation Protection function there is a bulleted item for control of dosimetry and access control. Is it the expectation that persons performing this duty be a Qualified HP Technician and if so why?
 - What is the basis for Foot Note 4 value of “Two qualified HP personnel”
6. For the Dose assessment/projections function the table B-1 augmentation column provides that 1 individual for dose projection staff is to be augmented at the TSC and the EOF. Would the staff consider this necessary for stations that provide for on-shift dose assessment capabilities and transfer the dose assessment function directly to the EOF upon activation and have equivalent TSC and EOF activation times?
 7. Under the Emergency Classifications function, what is the basis for the addition of the new on-shift *Emergency Classification Advisor* position?
 8. Under the Emergency Classifications function, 1 individual is prescribed for an *Emergency Classification Advisor* however this is then modified by a statement that *Licensees should consider having a liaison between Operations (Control Room) and the TSC to perform this function*. Does the *consider* statement mean that this position is optional?
 9. Note 5 to Table B-1 states “The ability to get ECCS equipment operational is the primary need while on-shift.” What is the technical basis for this statement (e.g. what event scenarios, assumptions, time period, etc.)? How does this description of on-shift repair team activities align to the guidance in NEI 10-05 for on-shift repair activities?
 10. The Repair Team Activities function of table B-1 for augmented personnel refers to “Provide electrical support for ECCS equipment, event mitigation, and equipment repair..... Provide mechanical support for ECCS equipment, event mitigation, and equipment repair.... Provide assistance with logic manipulation, support for event mitigation and equipment repair, and support of digital I&C if applicable.....” This seems very prescriptive as to the expected activities. What is the technical basis for this description of activities?
 11. Note 1 to Table B-1 states “A 10 CFR Part 50, Appendix E shift staffing evaluation must be performed to support assignment of multiple roles to individual responders on-shift. For augmented ERO positions, a similar approach is acceptable for evaluating whether personnel can adequately perform multiple functions without having competing priorities.” What is the NRC guidance for a “similar approach”, e.g. what event scenarios, assumptions, time period, etc.?

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12. Note 7 of Table B-1 states, “The development of on-shift staffing and ERO staffing levels should be ‘performance based’” Please define ‘performance based’ in this context. Please explain how ‘performance based’ comports with the on-shift staffing analysis required by Appendix E of 10 CFR 50.47.
13. Note 8 of Table B-1 states, “...the normal plant fire brigade organization should be described in sufficient detail to determine if adding emergency response functions creates situations where competing priorities could preclude timely emergency response.” Please provide an example of “sufficient detail”.
14. Has consideration been given to separation of On-Shift Staffing and Augmented ERO Staffing in terms of developing separate tables to address mitigative and command issues?