

NEI 99-02 FAQ 15-04 (Final)
Clarification on Granting Participation Credit During a HAB Drill/Exercise

Plant:	Generic	
Date of Event:	N/A	
Submittal Date:	09/14/2015	
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Performance Indicator:	EP02, ERO Drill Participation	
Site-Specific FAQ (Appendix D)?	No [This is generic]	
FAQ requested to become effective:	When approved	

Question Section

This FAQ implements a whitepaper approved by the ROP Working Group at its July 15, 2015 meeting. The whitepaper clarified when participation credit is to be given, as presented below.

NEI 99-02, Rev. 7, page 54, 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. The changes to NEI 99-02 presented in the Response Section were developed to eliminate the confusion.

Current Text: NEI 99-02, Revision 7, 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.

Event or circumstances requiring guidance interpretation: Not applicable

Response Section

Proposed Resolution of FAQ

NEI 99-02, Revision 7, Page 54, line 28-37

Some Security-related Drills or Exercises may have all DEP indicator opportunities performed solely 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. Credit can be granted to Key Positions for ERO Participation for a DEP evaluated Security-related Drill or Exercise without a DEP opportunity for all Key ERO positions 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

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(state/local) update notification. If an individual participates in more than one Security-related Drill/Exercise without a DEP opportunity in a three year period, ~~then only the first~~ one of the Security-related Drills/Exercises can be credited. A station cannot run more than one credited Security-related Drill/Exercise that does not include DEP opportunities for the TSC and/or EOF personnel in any consecutive 4 quarter period. There is no credit limitation on Security-related drills and exercises that include DEP opportunities for the TSC and/or EOF personnel. 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.

NRC Response

The NRC staff agrees with the proposed changes and recommends incorporation of these to NEI 99-02.