

THE EMERGENCY PREPAREDNESS CORNERSTONE OF THE REACTOR OVERSIGHT PROCESS

Japan Foreign Assignees – Group 2

Robert Kahler, Chief

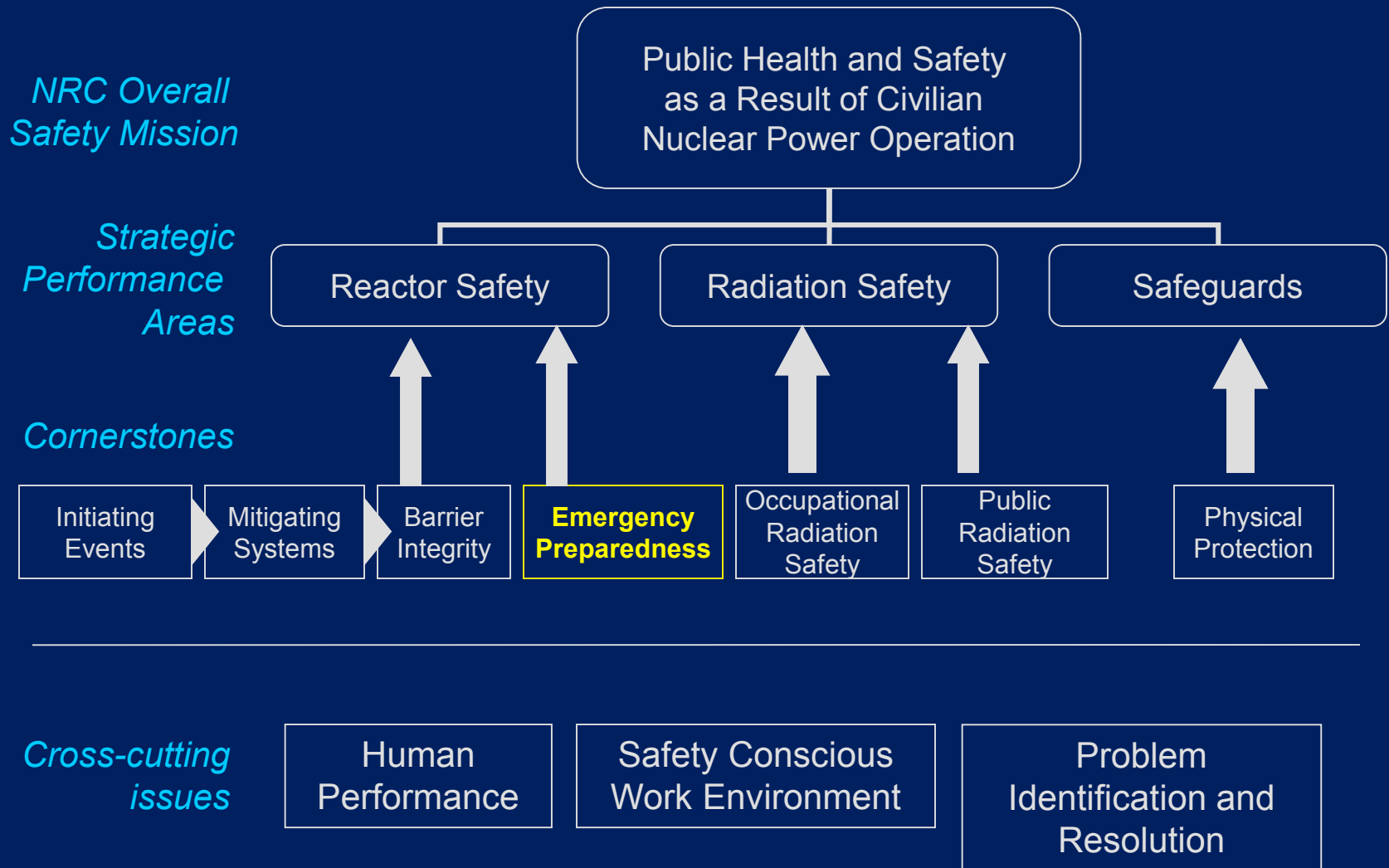
Policy and Oversight Branch

Division of Preparedness and Response

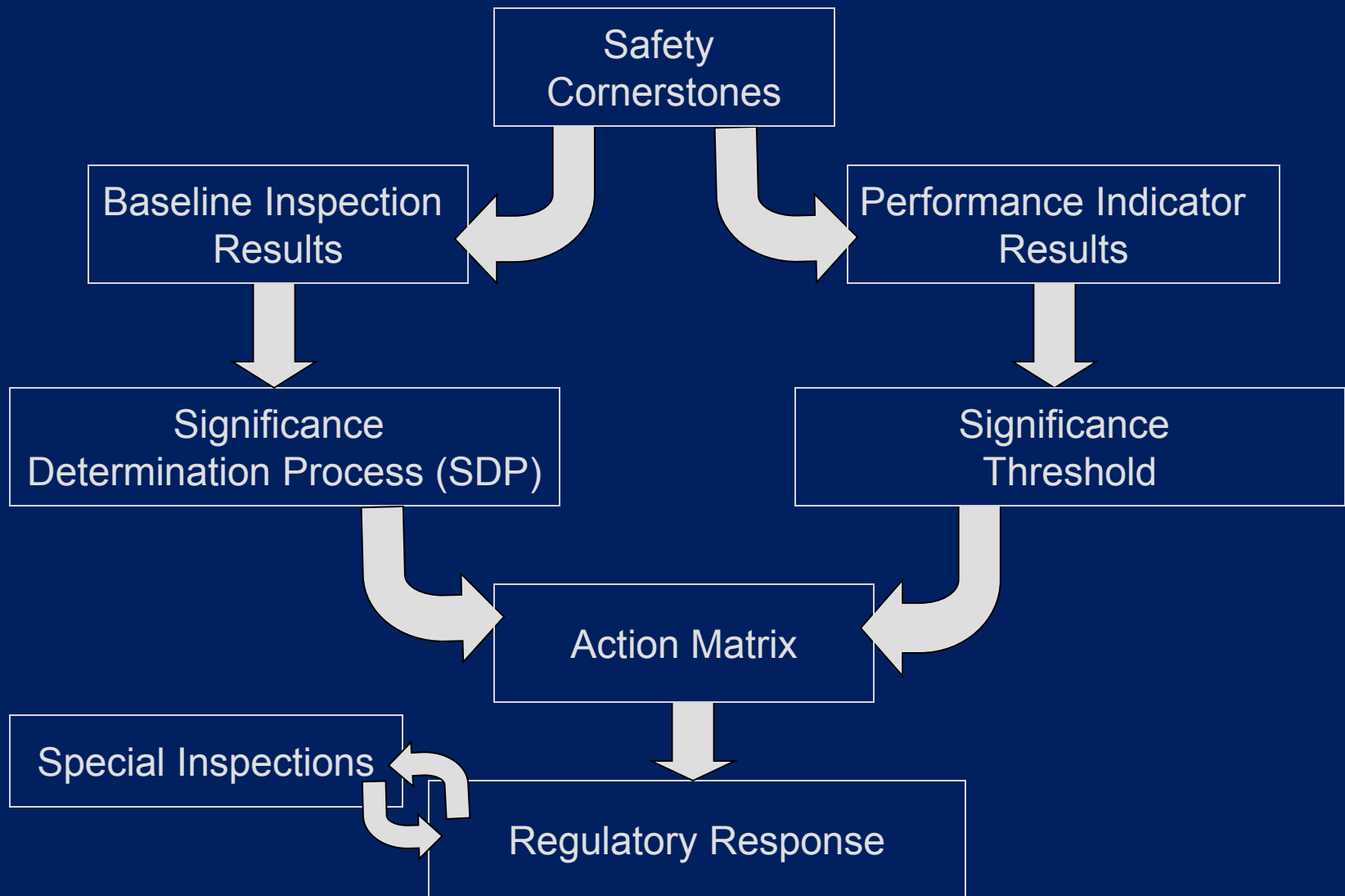
Office of Nuclear Security and Incident Response

March 27, 2018

REGULATORY FRAMEWORK



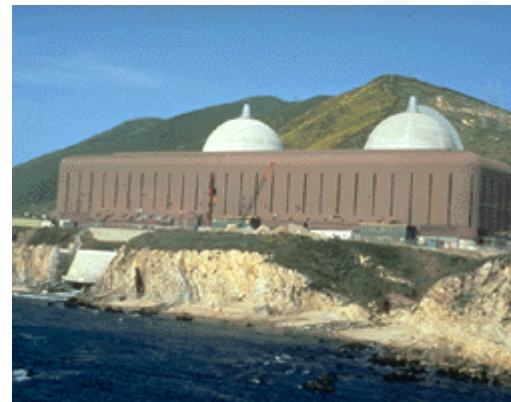
PERFORMANCE ASSESSMENT



FINDING COLORS / SIGNIFICANCE LEVELS

- **Green** Very low safety significance (licensee response band)
- **White** Low to moderate safety significance (increased regulatory response band)
- **Yellow** Substantial safety significance (required regulatory response band)
- **Red** High safety significance (unacceptable performance band)

- Objective:
- “Ensure that the licensee is capable of implementing adequate measures to protect the public health and safety in the event of a radiological emergency.”



- Performance Expectation:

“Demonstrate that reasonable assurance exists that the licensee can effectively implement its emergency plan to adequately protect the public health and safety in the event of a radiological emergency.”

- 3 Performance Indicators
- Baseline Inspection Program
- Special Inspection Program



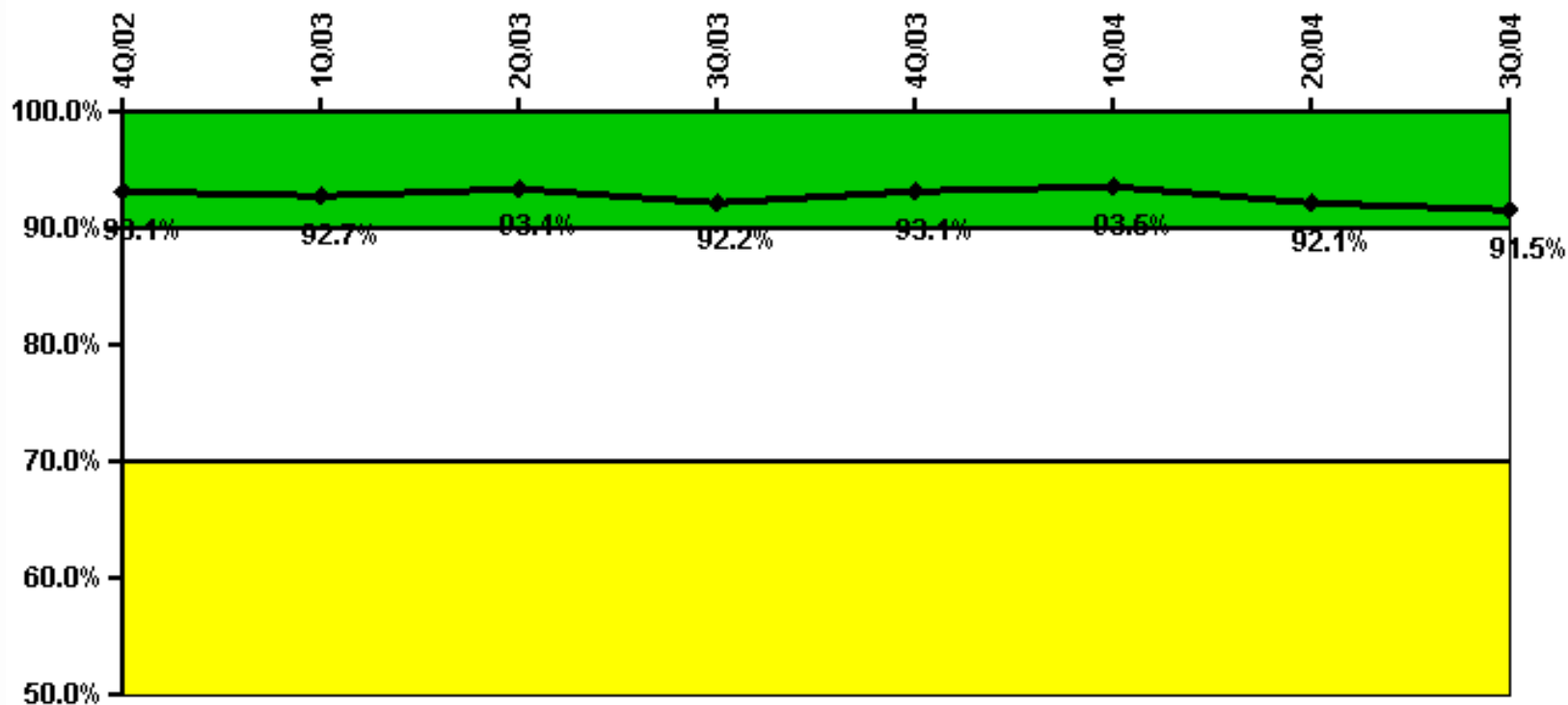
EMERGENCY PREPAREDNESS PERFORMANCE INDICATORS

- Drill and Exercise Performance (DEP)
- Emergency Response Organization Drill Participation (ERO)
- Alert and Notification System Performance (ANS)

- Monitors timely and accurate licensee performance in drills and exercise when presented with “opportunities” for classification, notification, and protective action recommendations (PARs)
- 90% Green/White threshold
 - # of timely & accurate classifications, notifications & PARs over previous 8 quarters
 - # of total opportunities over the previous 8 quarters

DEP PI EXAMPLE

Drill/Exercise Performance



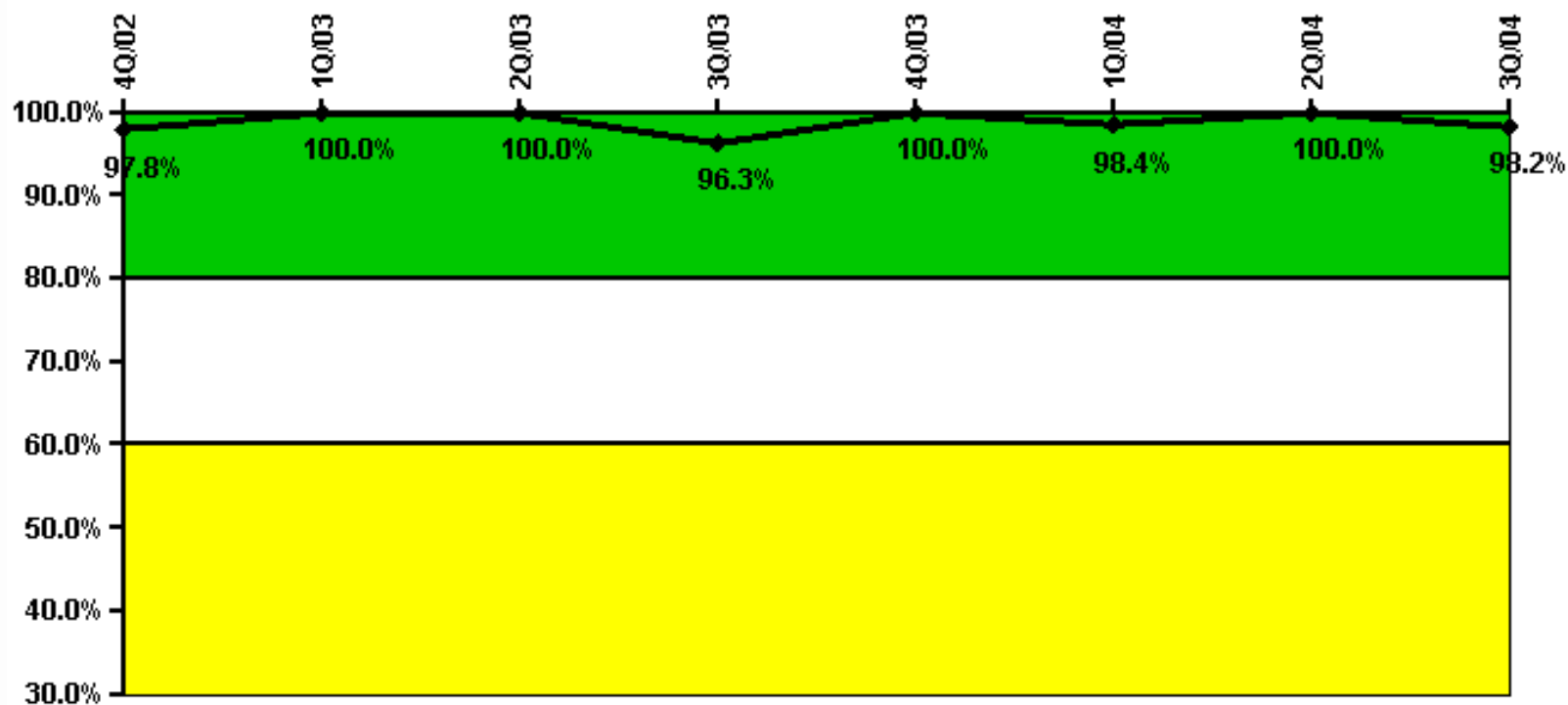
Thresholds: White < 90.0% Yellow < 70.0%

EMERGENCY RESPONSE ORGANIZATION (ERO) PI

- Percentage of ERO members assigned to fill key positions who have participated in a performance-enhancing drill/exercise
- 80% Green/White threshold
 - # of ERO members assigned to fill key positions that have participated in a drill in the last 8 quarters
 - total number of key positions assigned to ERO members

ERO PI EXAMPLE

ERO Drill Participation

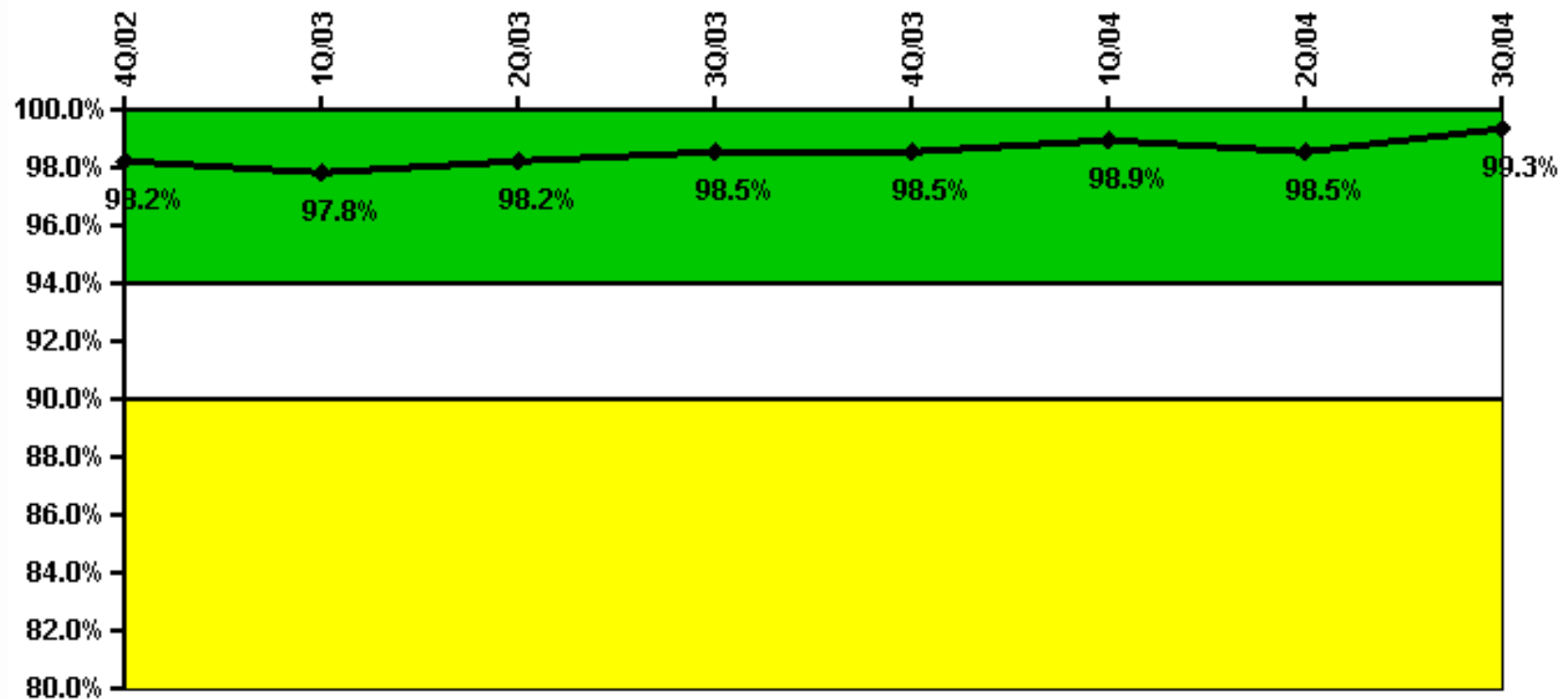


Thresholds: White < 80.0% Yellow < 60.0%

- Monitors the reliability of offsite ANS by reporting the success rate of regularly scheduled tests (documented in the licensee's test plan or guidelines) of the sirens to perform their function (e.g., silent, growl, siren sound test).
- 94% Green/White threshold
- # of successful siren tests in the last 4 quarters
- # of total number of siren tests in the last 4 quarters

ANS PI EXAMPLE

Alert & Notification System



Thresholds: White < 94.0% Yellow < 90.0%

EMERGENCY PREPAREDNESS BASELINE INSPECTION PROCEDURES

EMERGENCY PREPAREDNESS

- Procedure Objective
 - Gather information to determine, in conjunction with the performance indicators, whether a licensee is meeting the EP Cornerstone Objective and EP Performance Expectations
- EP Cornerstone Objective
 - “To ensure that the licensee is capable of implementing adequate measures to protect the public health and safety in the event of a radiological emergency.”
- EP Performance Expectation
 - “Demonstration that reasonable assurance exists that the licensee can effectively implement its emergency plan to adequately protect the public health and safety in the event of a radiological emergency.”

Prioritization of Inspection Areas

- Focus on adherence to Emergency Plan
- Emphasis on Risk Significant Planning Standards (RSPS)
- Prioritize other inspectable areas
 - - Emergency worker protection including accountability, evacuation, exposure authorization and thyroid protection
 - - Adequacy of offsite interface – PAR communication and technical support
 - - Timely activation of emergency response facilities
 - - Prioritization of mitigation and assessment efforts
 - - Command and control
 - - Ability to diagnose plant accident conditions.
 - - Ability to formulate mitigating actions.
 - - Ability to implement mitigating actions – dispatch damage control teams
 - - Adequacy of communications between emergency response facilities
 - - Accuracy and completeness of press releases
 - - Readiness and quality of EP equipment and facilities

ATTACHMENTS

- .01 Exercise Evaluation (biennial exercise)
- .02 Alert and Notification System Evaluation
- .03 ERO Staffing and Augmentation System
- .04 Emergency Action Level And E-Plan Changes
- .05 Maintenance of Emergency Preparedness
- .06 Drill Evaluation (resident inspector)
- .07 Exercise Evaluation - Hostile Action (HA) Event
- .08 Exercise Evaluation-Scenario Review

IP 71114.01 - EXERCISE EVALUATION

- Objective: Evaluate licensee conduct & critique of the Biennial Exercise
- Efficacy of DEP PI data dependent upon critiques
- Inspection Requirements:
 - Plan inspection of the biennial exercise
 - Review corrective actions (CAs) from drill/exercise critiques
 - Develop independent observations of licensee RSPS performance
 - Evaluate if NRC-observed weaknesses identified by licensee critique
 - Identify recurring weaknesses for CA effectiveness
 - Identify weaknesses that may be failure to meet PS or other regulation
 - Determine reasonable assurance of E-Plan implementation
 - Represent NRC at FEMA public meeting
 - Review FEMA offsite deficiencies and inform licensee

IP 71114.02 - ALERT AND NOTIFICATION SYSTEM EVALUATION

- Objective: Evaluate adequacy of ANS testing, maintenance, and support procedures for primary and backup ANS
- Inspection Requirements:
- Siren testing system design evaluation
 - Review DHS-approved design report and approved changes
 - Review E-Plan commitments
 - Evaluate adequacy of siren testing
- Program review
 - Review testing and maintenance program
 - Review sample of corrective actions and effectiveness
- Supplemental for non-siren ANS systems
 - Review Design of notification system
 - Evaluate testing, corrective actions, and maintenance

IP 71114.03 - ERO STAFFING AND AUGMENTATION SYSTEM

- Objective: Evaluate the adequacy of the ERO staffing levels and augmentation system
- Inspection Requirements:
 - Review ERO on-shift and augmentation staffing
 - Determine commitments for ERO staffing & activation process
 - Determine processes for ERO staffing & activation
 - Effectiveness of corrective actions for ERO staffing
 - Review ERO augmentation system
 - Changes to ERO augmentation system and process
 - Results of ERO augmentation drills and/or tests
 - Sample ERO staffing/augmentation program elements
 - Sample of ERO augmentation corrective actions & effectiveness

IP 71114.04 - EMERGENCY ACTION LEVEL & EMERGENCY PLAN CHANGES

Objectives:

- Review all EAL changes for decrease in effectiveness of the E-Plan
- Verify, on sample basis, that E-Plan changes did not decrease its effectiveness

Inspection Requirements:

- Review all EAL changes
- Emergency Plan Change Review
- Screen all E-Plan change submittals
- Review sample of changes with priority on RSPS

IP 71114.05 - MAINTENANCE OF EMERGENCY PREPAREDNESS

- Objective: Evaluate the licensee's performance in maintaining and following their E-plan and correcting EP-related issues
- Inspection Requirements – Examples of what to review:
 - licensee's PI&R program for correction of EP weaknesses
 - all actual events and adequacy of licensee's critique effectiveness and timeliness of event self-assessment
 - A sample of drill scenarios, documentation and critiques
 - A sample of corrective actions to determine effectiveness
 - Results of 10 CFR 50.54(t) reviews
 - EP Letters of Agreement / Memorandums of Understanding (LOA/MOU)
 - 10 CFR 50.54(q) plan change process and practice.
 - 8-year exercise cycle schedule of required elements.
 - licensee record(s) of evacuation time estimate (ETE) population evaluation.
 - licensee E-plan commitments to backup and alternate emergency response facility maintenance

Objective: To evaluate the conduct of selected drills and certain training evolutions and subsequent critiques

Resident Inspectors

Inspection Requirements:

- Determine which drills & training are contributing to DEP & ERO PIs; inspect sample of 3 – minimum 1 drill, 2 others
- Observe drill/training, emphasis on classification, notification, dose assessment, and protective action recommendations (PARs)
- Evaluate if NRC-identified weaknesses identified by licensee critique
- Determine licensee assessment of DEP PI opportunities

IP 71114.07 - EXERCISE EVALUATION - HOSTILE ACTION (HA) EVENT

Objective: Evaluate the adequacy of the licensee's capability to conduct a HA event biennial exercise to assess performance via a formal critique to identify and correct weaknesses.

Inspection Requirements:

- Plan inspection of the HA biennial exercise
- Review RSPS corrective actions (CAs) from Drill and Exercise critiques
- Develop observations of licensee RSPS performance in the HA environment
- Evaluate if NRC-observed weaknesses identified by licensee critique
- Identify recurring weaknesses for CA effectiveness
- Identify weaknesses that may be failure to meet PS or other regulation
- Determine reasonable assurance of E-Plan implementation in a HA event environment
- Represent NRC at FEMA public meeting
- Review FEMA offsite deficiencies and inform

IP 71114.08 - EXERCISE EVALUATION-SCENARIO REVIEW

Objective: Review licensee biennial exercise scenarios and objectives to ensure the exercise demonstration provides opportunities to demonstrate the licensee's capability to adequately perform key skills to protect public health and safety in the unlikely event of a radiological emergency

Scenario submittal 60 days prior to exercise date

Inspection Requirements:

- Verify the submitted scenario package is complete (e.g. exercise objectives, timeline of exercise events, description of imbedded drills)
- Verify required exercise objectives are included and DEP opportunities are identified.
- Scenario comments are discussed with FEMA representative
- Review licensee's records/schedule of required scenario elements to be demonstrated in the exercise cycle.
- Provide any exercise comments, questions or concerns to the licensee no later than 30 days prior to the scheduled exercise date.

EMERGENCY PREPAREDNESS SIGNIFICANCE DETERMINATION PROCESS

MC0609 Appendix B

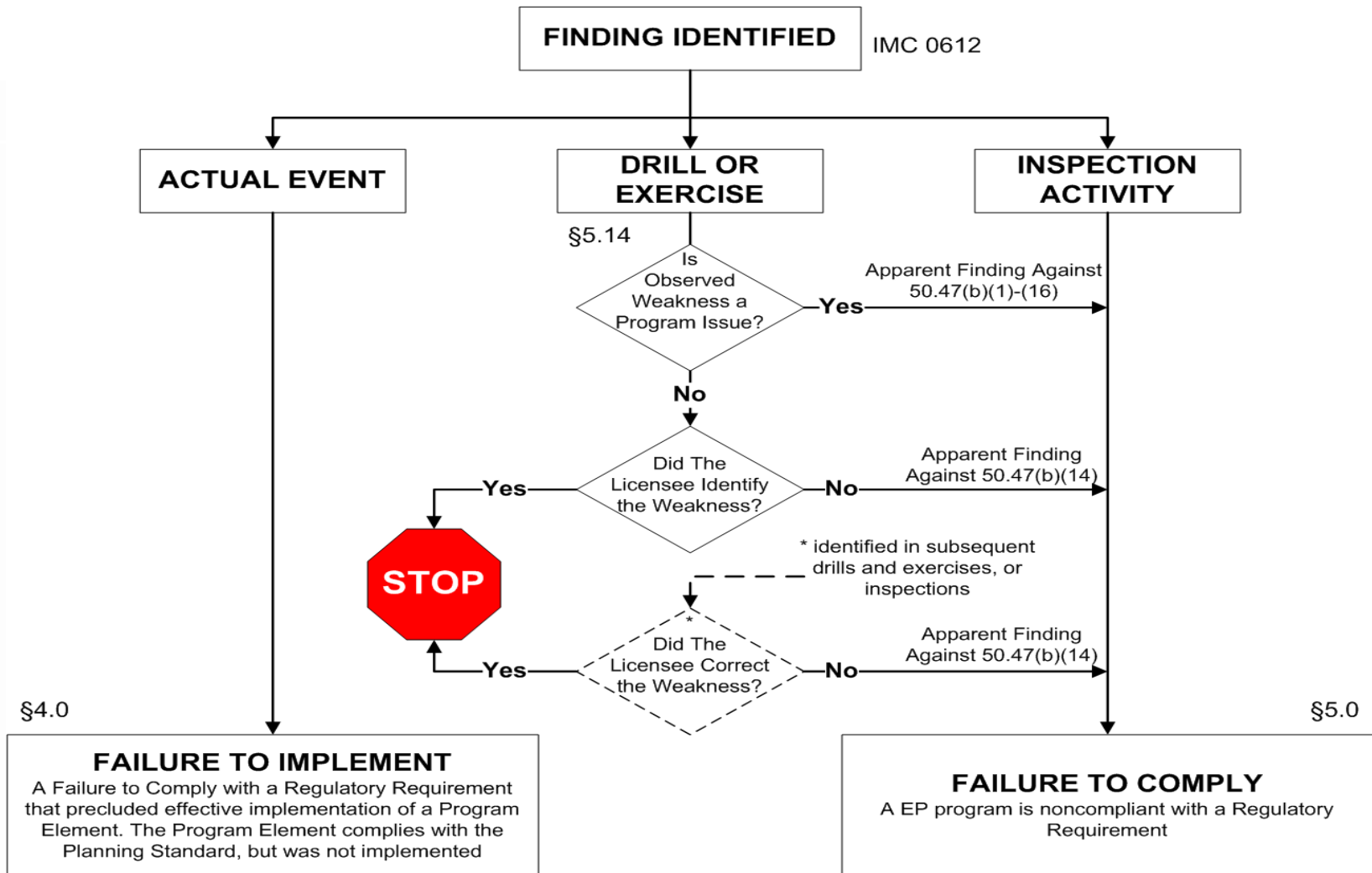
WHAT IS THE EP SDP?

- EP SDP addresses findings observed in:
 - Routine oversight activities.
 - Actual emergency response.
 - Emergency exercises and drills.

WHAT THE EP SDP IS NOT

- The SDP is NOT a method to determine if a issue of concern is a finding or violation or the severity level of a traditional enforcement violation.
 - See IMC0612 Appendix B or the NRC Enforcement Policy.
- EP Cornerstone does not address deficiencies or areas requiring corrective actions (ARCAs) identified by FEMA in offsite E-plans.
 - As such, the EP SDP only addresses onsite findings.

Failure to Implement / Comply



- **Failure to Comply (FTC)**

*An EP program is noncompliant with a **EP requirement**.*

- Associated with *preparedness* issues rather than *response* issues.

- **Failure to Implement (FTI)**

A finding during an actual event in which a failure to comply precluded effective implementation of program elements.

- Associated with *response* issues rather than *preparedness* issues.

EP SDP RATIONALE

FAILURE TO IMPLEMENT

- **FTI** (actual event) significance is based on:
 - The emergency classification level, and,
 - Whether the function not implemented was associated with a **RSPS** or a **PS**.
- The significance of a **FTI** involving **PS** is less than the significance of a **FTI** involving **RSPS**.
- The significance of a **FTI** finding is greater than a **FTC** finding since in an actual event, the public may be placed at risk.

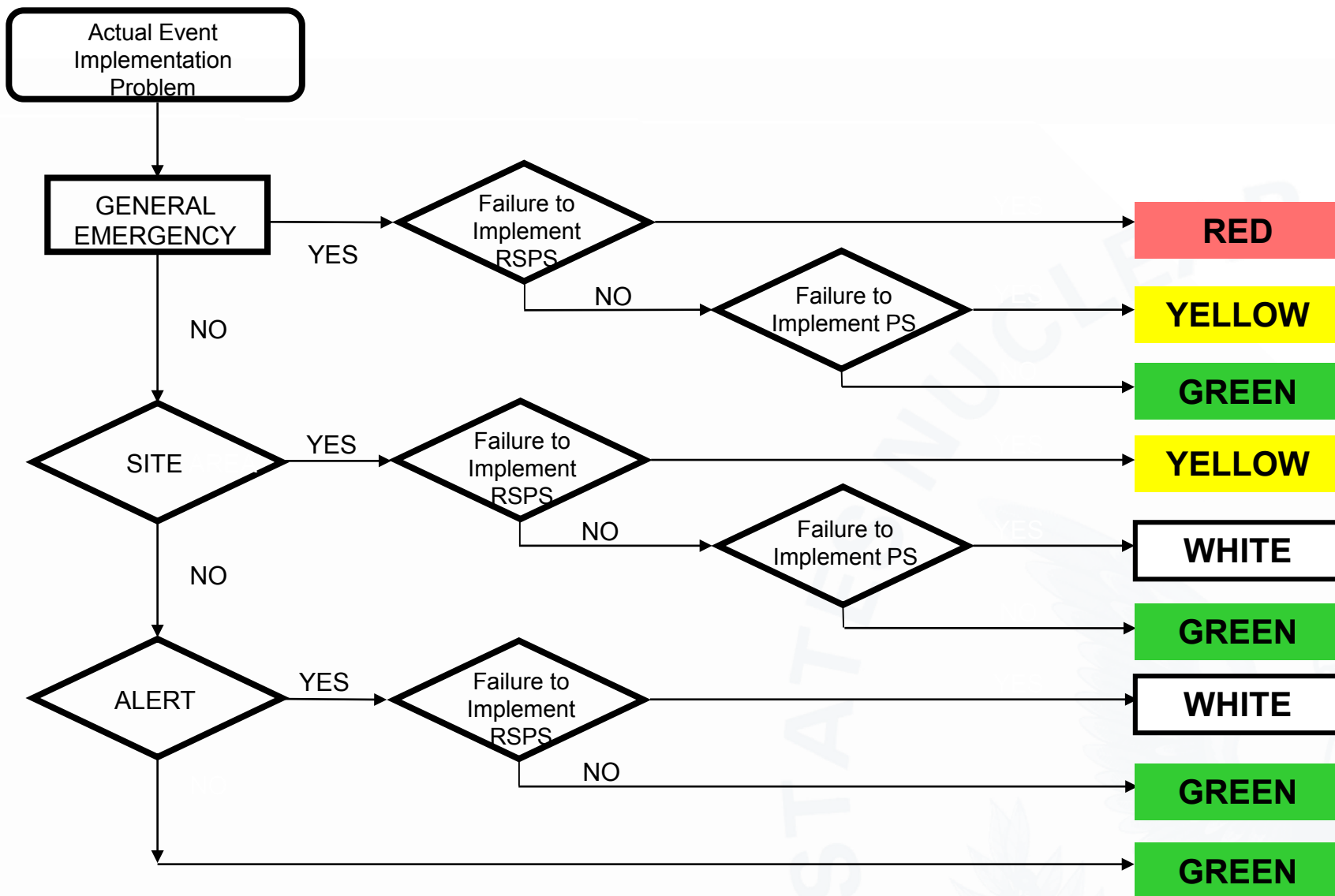
EP SDP RATIONALE

FAILURE TO IMPLEMENT

- **Emergency action level (EAL) findings**
 - Findings associated with over classification of emergencies are assessed significance based on whether the over classification resulted in OROs implementing unnecessary public protective actions.
 - Findings associated with a failure to classify, or to under classify, an emergency are assessed significance based on a **loss of RSPS function** and the emergency classification level that **should** have been declared.

EP SDP RATIONALE

FAILURE TO IMPLEMENT



DEFINITIONS

- **Emergency Response Organization (ERO)**

The licensee's organization identified in the E-plan for responding to emergencies at the licensee's facility. The ERO includes the onshift staff and the augmentation staff in the designated licensee emergency response facilities.

- **Offsite Response Organization (ORO)**

Those entities having responsibility for managing the implementation of measures to protect public health and safety within the plume exposure pathway, ingestion pathway, and emergency planning zones (EPZs) in the event of an emergency. This would typically include State, county, municipal, or Tribal emergency management agencies, as applicable.

Note: In all slides, text in bright green are defined terms in the EP SDP

- **Planning Standards (PS)**

The sixteen planning standards provided in 10 CFR 50.47(b).

- Many are supplemented with more detailed requirements in Appendix E to 10 CFR Part 50.

- **EP Requirement**

*Any requirement within the purview of the EP Cornerstone, including the **PS**, Appendix E to 10 CFR Part 50, 10 CFR 50.54(q), 10 CFR 50.54(t), the E-plan, Commission orders, other commitments, licensee self-imposed requirements necessary for demonstrating compliance with the **PS** and Appendix E to 10 CFR Part 50, and commitments made under 10 CFR 50.47(c) and 10 CFR 50.54(s)(2)(ii).*

- **Risk-Significant Planning Standard (RSPS)**

Any of the following four *planning standards*:

§ 50.47(b)(4), “Emergency Classification Scheme”

§ 50.47(b)(5), “Notifications”

§ 50.47(b)(9), “Assessment of Radioactivity Releases

§ 50.47(b)(10), “Protective Actions”

- Categorized by EP subject matter experts. If **RSPS functions** are not capable of being performed in an adequate manner, the public may be placed at greater risk. Hence greater emphasis is placed on **RSPS functions**.

DEFINITIONS

- **Program Elements (PE)**

*Items that comprise the implementation aspects of a **planning standard**.*

- Correspond to the evaluation criteria in NUREG-0654 / FEMA-REP-1 that identify acceptable methods for complying with a **planning standard**, or an approved alternative.
- Failure of a single **program element** does not always mean that the **PS function** cannot be accomplished.

- **Planning Standard Functions (PSF)**

*One or more functions that are considered essential to complying with a **RSPS** or **PS**. PSF are identified for assessing the significance of a finding that involves noncompliance with a RSPS or PS.*

- Identified for the purpose of assessing significance of a finding. (Cannot be cited as violation).
- A single non-compliant **program element** does not always mean that a **planning standard function** cannot be accomplished.
- A subset of **planning standard functions** are deemed to be **risk-significant planning standard (RSPS) functions**.

- **Loss of RSPS [PS] Function**

A *Failure To Comply* finding that one of more **PE** is not adequate, not compliant with the **RSPS [PS]**, or otherwise not functional to the extent that the **RSPS [PS] function** would not be accomplished if an actual radiological emergency were to occur. One or more of the following reasons may apply:

- Certain E-plan commitments not met,
- E-plan is less than adequate,
- Implementing procedures are not effective,
- ERO personnel are not capable of implementing the **PE**, or
- EP program design is not fully adequate.

- **Degraded RSPS [PS] Function**

*Program elements are not adequate or not compliant with **planning standards**, but there is reasonable assurance that the **planning standard function**, although degraded, would be accomplished if a radiological emergency were to occur.*

- The E-plan is less than adequate.
- Implementing procedures are not effective.
- The EP program design is not fully adequate.

- **Time of Discovery**

When the licensee “knew or should have known” of a condition.

- Assume condition occurred at the time of discovery, including as necessary, timely confirmation or analysis of raw indications (i.e., when the licensee “knew”).
- If a condition existed prior to its discovery and it can be shown that the licensee missed an earlier opportunity (surveillance, log review, etc.) to recognize the condition (e.g., when the licensee “should have known”) the time of discovery is the first missed opportunity.

ABBREVIATIONS/CONVENTIONS

- ANS = Alert and Notification System
- DEP = Drill and Exercise Performance (a PI)
- EAL = Emergency Action Level
- ERO = Emergency Response Organization (onsite)
- ERF = Emergency Response Facility (usually onsite)
- NCV = Non-Cited Violation
- NOV = Notice of Violation
- ORO = Offsite Response Organization
- PAR = Protective Action Recommendation
- PI = Performance Indicator
- ROP = Reactor Oversight Process

EP SDP RATIONALE

SEE ALSO

**IMC0308 ATT. 3, APPENDIX B,
TECHNICAL BASIS FOR EMERGENCY PREPAREDNESS
SIGNIFICANCE DETERMINATION PROCESS**

EP SDP RATIONALE

- The EP SDP uses **deterministic** approaches to assessing significance.
- The EP SDP **is not risk-based**
 - Emergency preparedness is a defense-in-depth program.
 - The probability of a particular reactor accident sequence has no relevance to the significance of an EP finding since EP planning basis addresses a broad spectrum of accidents.
 - If the emergency plan is being implemented, the probability of the accident is 1.0.
- The EP SDP **is risk-informed**
 - Findings involving **risk-significant planning standards** are assigned more significance; others, less significance.

EP SDP RATIONALE FAILURE TO COMPLY

- EP SDP makes *a qualitative predictive* evaluation of the impact of the finding on the licensee's capability to implement its E-plan should an accident occur.
 - The probability of a particular reactor accident sequence has no relevance to the significance of an EP finding since EP planning basis addresses a broad spectrum of accidents. Thus, no single conditional probability.
 - The significance assigned to a finding is not based on the conditions at the time of identification but rather on what the impact would have been or would be in an actual emergency if the noncompliance was not corrected.
 - The wind may never have blown in the direction of a TSC for the duration of a failed ventilation isolation , but it could have.

EP SDP RATIONALE FAILURE TO COMPLY

- **Basis**

“What could have been the likely impact of the non-compliances if an actual accident was to have occurred, or was to occur in the future, and the findings had not been corrected?”

- **FTC significance is based on:**

- Whether the finding is associated with a **RSPS function** or a **PS function**
- Whether the finding is a:
 - **Lost RSPS [PS] function**, or
 - **Degraded RSPS [PS] function**

EP SDP RATIONALE

FAILURE TO COMPLY

- **Emergency action level (EAL) findings**
 - Findings associated with an over classification of an emergency are assessed significance based on whether the over classification would, in an actual emergency, cause OROs to implement unnecessary public protective actions.
 - The significance of findings related to ineffective EALs is based on (1) the correct emergency classification level, and (2) whether, because of redundant EALs, an accurate and/or timely classification could still be made.
- **Equipment Outage Significance**
 - EALs associated with equipment outages, generally are assessed significance based upon the magnitude of the outage and licensee's timeliness in taking actions to restore the equipment or implement corrective actions.

EP SDP RATIONALE

TREATMENT OF EXERCISE WEAKNESSES

- A **Weakness** is defined as:

*A level of **ERO** performance demonstrated during an exercise, drill, or training that provides performance opportunities to develop, maintain, or demonstrate key skills that would preclude effective implementation of the E-plan if it were to occur during an actual radiological emergency.*

- EP cornerstone is designed to foster development and maintenance of **ERO** skills.
 - **ERO** performance deficiencies, equipment problems, and procedure problems can be expected in a drill and exercise program.
 - Identification and correction of **weaknesses** is a positive and vital aspect of the program.

EP SDP RATIONALE

TREATMENT OF EXERCISE WEAKNESSES

- **Weaknesses** observed in an exercise has little or no direct safety significance if identified and corrected.
 - Identification and correction enhances the **ERO** performance.
 - NRC penalties for **weaknesses** could discourage identification – enhancement might not occur and **ERO** performance could degrade.
- Thus, inspection focus is on the licensee's ability to identify the weaknesses and on the timeliness and accuracy of corrective actions.
- A **Weakness** identified by the licensee in its critique is not a performance deficiency and is, therefore, neither an **FTC** nor an **FTI**. Hence, no significance is assessed.

EP SDP RATIONALE

TREATMENT OF EXERCISE WEAKNESSES

- A licensee's failure to identify a **Weakness** in a critique, or failure to take timely corrective actions, is evaluated as an **FTC** with **PS** 10 CFR 50.47(b)(14). Significance is based on whether the **Weakness** is associated with a **RSPS** (White) or a **PS** (Green).
- A deficient **PE** uncovered by the exercise is evaluated as an **FTC**. Significance is based on whether the **PE** is associated with a **RSPS** (White) or a **PS** (Green).
- Identification of drill and exercise weaknesses is critical to the validity of the EP Cornerstone licensee response band.
 - The validity of the DEP PI is dependent on the licensee's ability to identify **weaknesses**.

SECTION 5.0

FAILURE TO COMPLY ISSUE

FAILURE TO COMPLY

§5.0.1 BACKGROUND

- Finding may be identified during program inspection activities and are related to preparedness issues.
- A **FTI** finding, or an **ERO weakness** during an exercise may uncover a **FTC**.
 - Highest significance is cited.
- §5.1 to §5.16 correspond to §§50.47(b)(1)-(16).
 - Identifies the **PS** and the **planning standard function(s)**.
 - Provides examples of findings corresponding to:
 - **Loss of RSPS [PS] function,**
 - **Degraded RSPS [PS] function,**

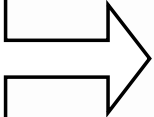
FAILURE TO COMPLY

§5.0.1 BACKGROUND

5.1 10 CFR 50.47(b)(1), Emergency Response Responsibility

PLANNING STANDARD:

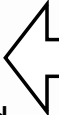
Planning Standard
Language from
10 CFR 50.47(b)



Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

PS FUNCTIONS:

1. Responsibility for emergency response is assigned.
2. The response organization has the staff to respond and augment on a continuing basis (24/7 staffing) in accordance with the E-plan.



Planning Standard
Functions for this
Planning Standard

Supporting Requirements:

10 CFR Part 50, Appendix E, Sections IV.A.1 through IV.A.8



Supporting
Requirements for this
Planning Standard

Informing Criteria:

NUREG-0654/FEMA-REP-1, Section II.A, and the licensee's approved E-plan



Informing Criteria for
this Planning Standard



(b)(3)

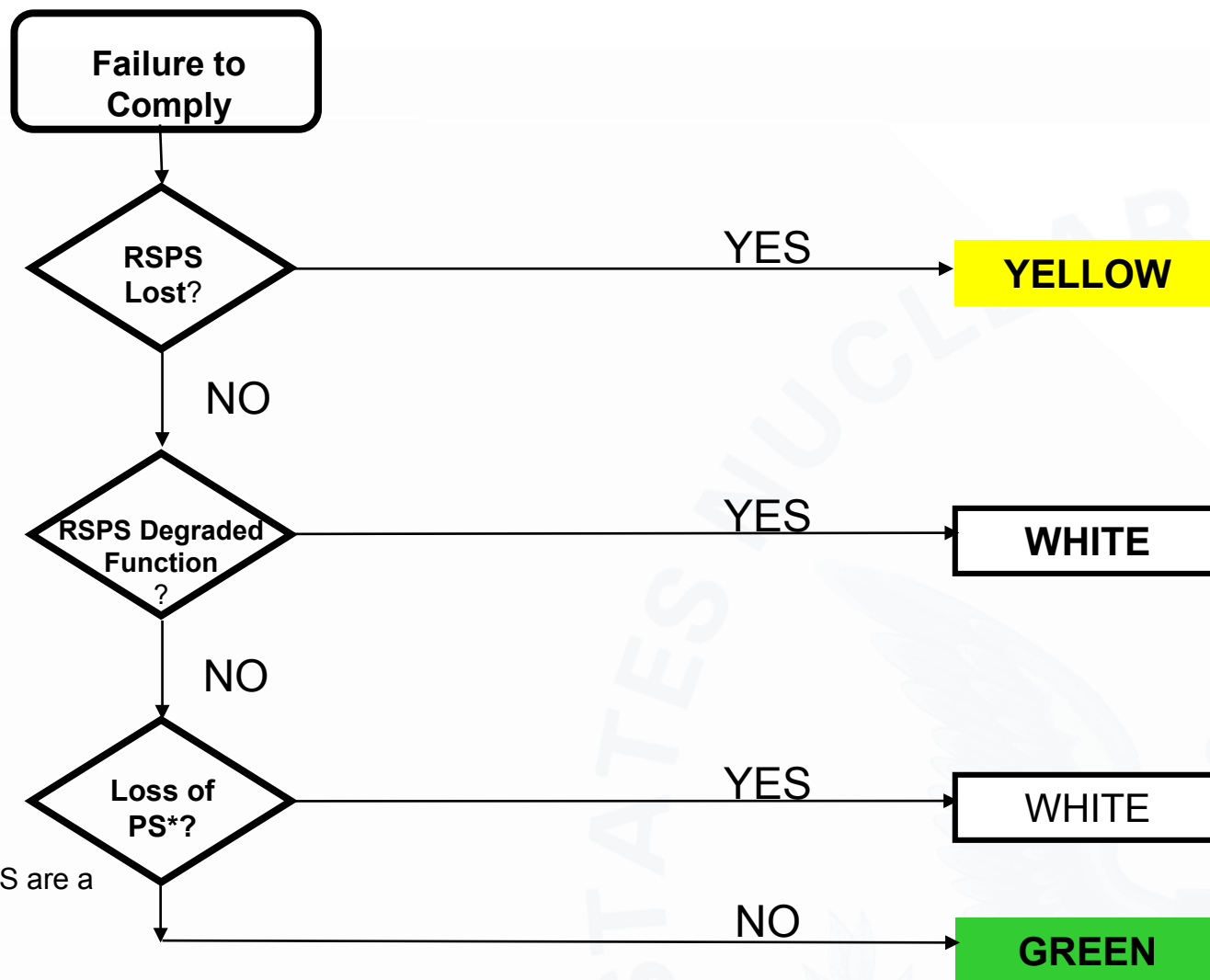
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FAILURE TO COMPLY

§5.0.1 BACKGROUND

- Significance examples are not **EP requirements**.
- Significance examples are neither:
 - all-inclusive, nor,
 - exclusive.
- Significance examples may or may not envelop the finding being considered—judgment is required.
- If no example envelops the finding being considered it will be necessary to compare the finding to the definitions of **Loss of RSPS [PS]** or **Degraded RSP [PS]**.

EP SDP RATIONALE FAILURE TO COMPLY



*Remember that RSPS are a subset of PS

FAILURE TO COMPLY CRITERIA

- Some significance examples explicitly provide **compensatory measures** that can be credited in assessing significance.
 - A compensatory measure is some action taken to compensate for an inadequate **program element** such that there is a reasonable expectation that the **planning standard function** would be accomplished, should an accident occur prior to completion of corrective actions.
 - To be a viable **compensatory measure**:
 - The measure must be proceduralized, ERO personnel have received training, necessary equipment and personnel are readily available to implement the measure, or the measure reasonably falls in the definition of “skill of the craft.”

FAILURE TO COMPLY

§5.0.3 SDP STEPS

- (a) If finding is not associated with a **planning standard function**, assign Green significance.
 - e.g., findings against §50.54(t), or Appendix E requirements that do not support a **planning standard function**.
- (b) Identify the **planning standard function(s)** affected by the finding.
 - Each should be assessed for significance.
- (c) Compare the finding to the significance examples in the appropriate section 5.1-5.16.
 - Use Attachment 2 if finding is not enveloped by an example.
- (d) Consider parallel related issues.
 - Discuss in inspection report but cite only the most significant finding.
- (e) Document basis of significance in the inspection report.

FAILURE TO COMPLY

(b)(14) DRILLS & EXERCISE

Weaknesses

- An inaccurate and/or untimely classification, notification, or PAR is a weakness associated with an RSPS.
- However, a **weakness** is not confined to **ERO** performance problems that result in a **loss of PS function**. An apparent success regarding classification, notification, or PAR development could be a **weakness** if the performance was based on misinformation, lack of information, invalid indications, or compensating errors (e.g., the PAR was based on an erroneous dose projection).
- Failure to identify mistakes and miss-steps by **ERO** members (especially those corrected by **ERO** peer-checking) as **weaknesses** is generally not a regulatory concern.
- Inspectors need to remain alert to controller actions (prompting, etc) that could have the effect of masking a **weakness**.

FAILURE TO COMPLY (b)(14) DRILLS & EXERCISE

- **Critique**

*A formal assessment of **ERO** performance following a drill or exercise.*

- Licensees perform **critiques** in many different ways.
- The pertinent feature of **critique** is that a **weakness** is identified and entered into a corrective action system.
- If **weakness** is a result of an inadequate plan or procedure, then it may not be a **critique** issue. It may be a **failure to comply**, and the applicable PS should be evaluated rather than (b)(14).

CORRECTIVE ACTIONS

- **Failure to Correct Drill or Exercise Weakness**
 - Not intended that a single repetition be deemed a failure to correct.
 - Conversely – a well-drilled team may not demonstrate success of problem resolution.
 - Assessment of corrective actions should be based on complete history of issue.
 - DEP PI allows 10% failure rate for licensee response band. Use same philosophy for non-DEP PI areas.
 - Data from drill critiques may be used to determine effectiveness of corrective actions.

Contact Information

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QUESTIONS?

