

# Whitepaper to Change Text of NEI 99-02

## DEP Form Accuracy

### Introduction

Licensees have developed initial notification forms to support notifying offsite response organizations (OROs) of a declared emergency and to communicate important event information (e.g., the applicable emergency action level and/or protective action recommendation). The information contained on a site-specific form is based on regulatory requirements and determined in consultation with the relevant OROs. While all the information on these forms is important to the emergency response, only the information related to the declared emergency action level (EAL) or development of a protection action decision (PAD) by an ORO should be tracked by the Drill/Exercise Performance (DEP) Performance Indicator (PI).

The criteria in NEI 99-02, Revision 7,<sup>1</sup> for assessing the accuracy of an initial notification form consider all the listed form entries to have equal risk significance. This is based on the presumption that an error in any one of them will result in an unsuccessful performance indicator opportunity. Thus, currently, licensees are guided to report as DEP PI failures some incorrect form entries that would not materially impact ORO development of PADs.

### NEI 99-02 Section Affected

The guidance to be changed involves the criteria for assessing the accuracy of an initial notification form for alerting an ORO of an emergency declaration and/or Protective Action Recommendation (PAR). The affected text is found in NEI 99-02, Revision 7, markup attached.

### Discussion

The proposed resolution is to revise the guidance for assessing the accuracy of initial notification forms for the purposes of the DEP PI. The revised accuracy criteria identify form entries that are always required for ORO protective action decision-making (more risk significant) and eliminates those that are not critical to such decisions (less risk significant). Entries of the latter type need not be assessed for DEP PI purposes because they can be corrected on the spot during a notification or by a subsequent notification/communication with no impact on the effectiveness of ORO decisions. The proposed change is consistent with the initial notification form content guidance in Section II.E.3 of NUREG-0654/FEMA-REP-1, Revision 1<sup>2</sup> and Draft Revision 2.<sup>3</sup>

With respect to the other information contained on a site-specific form, this existing “Clarifying Notes” paragraph would apply:

*“It is understood that initial notification forms are negotiated with offsite authorities. If the approved form does not include these elements, they need not be added. Alternately, if the form includes elements in addition to these, those elements need not be assessed for accuracy when determining the DEP PI. It is, however, expected that errors in such additional elements would be critiqued and addressed through the corrective action system [emphasis added].”*

Related to the above discussion, the term Protective Action Recommendation, or PAR, should be added to the accuracy criteria because it subsumes two of the current initial notification form attributes, “Whether offsite protective measures are necessary” and “Potentially affected population and areas.”

<sup>1</sup> “Regulatory Assessment Performance Indicator Guideline”, NEI 99-02, Revision 7, August 31, 2013. A line-in/line-out version, showing changes from Revision 6 to Revision 7, is available on the NRC web site at <https://www.nrc.gov/docs/ML1326/ML13261A116.pdf>.

<sup>2</sup> “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants”, NUREG-0654/FEMA-REP-1, Revision 1, November 1980. Available at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr0654/r1/>

<sup>3</sup> NUREG-0654/FEMA-REP-1, Draft Revision 2 is available at <https://www.nrc.gov/docs/ML1416/ML14163A605.pdf>.

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In other words, a PAR transmits the protective measures identified as necessary for a given population or area (e.g., evacuate a subarea or shelter a town). The DEP indicator “Clarifying Notes” section already uses the term PAR in a manner consistent with its addition to the form accuracy criteria.

### **Proposed Changes to NEI 99-02 (*see markup*)**

As reflected in the attached markup, the initial notification form information to be assessed for accuracy is as follows:

- Plant/site name
- Site-specific EAL identifier/number (e.g., RA 1.1 or HU1.2)
- Time of declaration of emergency
- Whether a release is taking place due to the event
- Wind direction and speed, and stability class
- The protective action recommendation, if warranted
- Authorizing signature or other indication of authorization

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DEP Form Accuracy**

Markup of Proposed Changes to NEI 99-02

Page 47

Line

- 38 • Initial notification form completed appropriate to the event to include (see clarifying notes):
- 39 - ~~Class of emergency~~
- 40 - ~~Site-specific EAL identifier/number (e.g., RA 1.1 or HU1.2)~~EAL number
- 41 - ~~Description of emergency~~
- 42 - Wind direction and speed, and stability class
- 43 - The protective action recommendation, if warranted~~Whether offsite protective measures are necessary~~

Page 48

Line

- 1 - ~~Potentially affected population and areas~~
- 2 - Whether a release is taking place due to the event
- 3 - ~~Date and t~~Time of declaration of emergency
- 4 - ~~Whether the event is a drill or actual event~~
- 5 - Plant/site name~~Plant and/or unit as applicable~~
- Authorizing signature or other indication of authorization

Line numbers to be renumbered as needed in final version.