

**DEVELOPMENT OF PERFORMANCE
INDICATORS (PI) WITH POTENTIAL REVISIONS
TO NEI 99-02 TO SUPPORT A 10 CFR 50.54(t)
24 MONTH EMERGENCY PREPAREDNESS
PROGRAM REVIEW FREQUENCY OPTION**

PUBLIC MEETING

May 23, 2019

Meeting Overview

- Purpose of meeting
- Background of Final Rule
- Performance Indicator examples
- Path Forward

Purpose

To meet with the Nuclear Energy Institute (NEI), Industry and members of the public to discuss the development of performance indicators (PI) including potential revisions to NEI 99-02 to support a 10 CFR 50.54(t) 24 month emergency preparedness program review frequency option.

To discuss possible considerations for additional enhancements to NEI 99-02.

Background

- PRM-50-60 Docketed January 19, 1994
Virginia Power requested that the NRC change the required review frequency for emergency preparedness programs at nuclear power reactor facilities to give licensees the option for a 24 month review frequency.
- July 31, 1997 (62 FRN 40978) Proposed Rule published
- Final Rule Issued March 29, 1999
- March 29, 2018, NEI White Paper, *“Performance Indicators for Adjusting the Frequency of Emergency Preparedness Program Reviews”*
- Transformative Approach: Enhance NEI 99-02 such that performance would satisfy requirements for a 24-month 50.54(t) frequency.

Performance Indicator Examples Listed in the Final Rule

- Emergency Response Facility Availability
- Completeness of ERO Duty roster training
- Quality of response to declared plant emergencies
- Timeliness of corrective action closure
- Measure of State and local interface
- Percentage of drill objectives successfully demonstrated

Possible Performance Indicators for Development to Support the 24 Month Frequency

- Emergency Response Facility (ERF) Availability
 - The ERF PI would measure the ability of the licensee to maintain emergency response facilities and equipment in a state of functional readiness.
- Measure of State and local interface
 - Develop a method to audit ORO satisfaction with the licensees Radiological EP program. The licensees Quality Assurance organization could shadow EP evaluators at the EOF and JIC/JIS during integrated drills and exercises that require an offsite emergency response in order to observe ORO-licensee cooperation and effectiveness.

Performance Indicators to Consider for Possible Elimination

- Alert and Notification System (ANS)
 - The ANS PI has not resulted in significant insight into EP equipment maintenance. Additionally, offsite response organizations provide annual siren reliability data to the Federal Emergency Management Agency (FEMA) in their Annual Letter of Certification (ALC). Thus, the ANS PI is redundant to the ALC siren data.

Possible Future Enhancements

- Performance Enhancing Opportunities
 - Consider enhancing guidance in this area for each key ERO-PI position.
- ERO Key Positions
 - Consider re-baselining which positions should be tracked with this PI.

Path Forward

- NRC to determine NEI 99-02 changes and follow applicable processes for submission and review, including support for any public meetings.

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