

FAQ 20-02: EP-ERO Performance Indicator

Plant: Generic

Date of Event: N/A

Submittal Date: 04/XX/2020

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Performance Indicator: Emergency Response Organization Drill Participation

Site-Specific FAQ (see Appendix D)? () Yes or (X) No

FAQ to become effective when approved.

Question Section:

The Emergency Response Organization Drill Participation Performance Indicator (ERO-PI) tracks the participation of key ERO positions in performance-enhancing experiences, i.e., participation in drills, exercises, or in an actual event. The ERO-PI is calculated by dividing the number of ERO members assigned to key positions that have participated in a drill, exercise, or actual event during the previous eight (8) quarters by the total number of key positions assigned to ERO members, and then multiplying by 100 to obtain a percentage.

Typically, when a licensee key ERO member is at risk of exceeding eight (8) quarters without participating in a performance-enhancing experience, a licensee either schedules and implements a drill or exercise prior to exceeding the eight-quarter window or removes the ERO member from the ERO until a drill or exercise opportunity can be completed. The COVID-19 epidemic has resulted in a need to practice social-distancing as much as is practical. The practice of social-distancing makes efforts to perform a drill or exercise during this period impractical and thus may cause a licensee key ERO member to exceed the eight-quarter time frame.

Potentially relevant FAQs: None

Response Section:

Proposed Resolution of FAQ:

Proposed resolution for the current COVID-19 event situation:

For the COVID-19 event, an extension until December 31, 2020 to remove the impacted key ERO members from the ERO PI calculation, is reasonable given the nature of the event and the need to schedule and implement the necessary drills or exercises. Licensees are expected to use the Comment Fields in the Quarterly Reports to document the extension in the ERO-PI data

FAQ 20-02: EP-ERO Performance Indicator

as well as the date when the data will be updated to reflect completion of applicable drills or exercises for those key ERO members.

If appropriate, provide proposed rewording of guidance for inclusion in next revision:

Proposed wording to be added to NEI 99-02 guidance for the Emergency Response Organization Drill Participation PI:

During a pandemic or other external event beyond the licensee's control where the recommended response actions such as social-distancing, are implemented and a licensee is experiencing similar difficulties in completing drills or exercises, it is acceptable to extend the eight-quarter window to allow for the public health emergency to end and to allow a reasonable amount of time to schedule and implement applicable drills or exercises. The amount of time that is considered reasonable is event-specific and will be provided by the NRC when necessary to ensure consistent application and understanding.

PRA update required to implement this FAQ?

No.

MSPI Basis Document update required to implement this FAQ?

No.