

## FAQ 20-02: EP-ERO Performance Indicator – Final Approved

**Plant:** Generic

**Date of Event:** N/A

**Submittal Date:** 04/15/2020

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**Performance Indicator:** EP02, Emergency Response Organization Drill Participation

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

**FAQ to become effective:** When Approved.

### **Question Section:**

NEI 99-02 Guidance needing interpretation (include page and line citation<sup>1</sup>):

- Page 9, Table 2, indicates that the ERO Drill Participation PI takes into account “the previous eight quarters”
- Page 53, line 12, defines Emergency Response Organization Drill Participation performance indicator as including “the previous eight quarters”
- Page 53, lines 19 and 20, require the reporting of the “total number of ERO members assigned to fill Key Positions that have participated in a drill, exercise, or actual event in the previous eight quarters”
- Page 53, lines 22 and 23, state that the Emergency Response Organization Drill Participation performance indicator is calculated “based on participation over the previous eight quarters...”
- Page 53, line 30, shows the formula for calculating the indicator, and indicates that the numerator includes the phrase “the previous 8 qtrs”
- Page 56, lines 46 and 47, include the phrase “during the eight quarter evaluation period”

### **Event or circumstances requiring guidance interpretation:**

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 schedules and implements a drill or exercise prior to exceeding the eight-quarter window. The COVID-19 public health emergency has resulted in a need to practice social-distancing as much as 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.

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<sup>1</sup> Page and line numbers refer to the “line-in/line-out” version of NEI 99-02, Rev. 7, found on the NRC ROP web site and in ADAMS (ML13261A116).

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**If licensee and NRC resident/region do not agree on the facts and circumstances, explain:**

There is no disagreement on the facts and circumstances.

**Potentially relevant FAQs:** None

### **Response Section:**

#### **Proposed Resolution of FAQ:**

Proposed resolution for the current COVID-19 event situation:

For the COVID-19 event, a licensee may extend the ERO-PI end date for all key ERO members with end dates on or prior to September 30, 2020, to December 31, 2020. This change 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.

Reasonable assurance of public health and safety from the consequences of a radiological event will continue to be maintained by this action as it would only extend the 8-quarter window for completion of a performance-enhancing opportunity for a key ERO member that would otherwise exceed their 8-quarter window. Allowing 1-quarter to recover from the PHE, and to schedule and complete the performance-enhancing opportunity, does not compromise reasonable health and safety. This action also does not adversely affect a licensee's performance in accordance with the ROP.

#### **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 as a Clarifying Note:

Should an external event beyond the licensee's control (e.g., a public health emergency) inhibit the safe conduct of drills or exercises, then it is acceptable to grant a reasonable extension of the ERO-PI end date for each key responder, beyond the normal eight-quarter window. 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. The permitted time will consider the nature of the external event (e.g., ending a public health emergency) and the amount of time needed to schedule and implement necessary drills or exercises. For the COVID-19 event, holders of ERO key positions with end dates on or prior to September 30, 2020, may have their ERO-PI end date extended to December 31, 2020.

**PRA update required to implement this FAQ?** No.

**MSPI Basis Document update required to implement this FAQ?** No.