

**FAQ 20-04: Crediting Automated Notifications in the DEP Performance Indicator  
Proposed NRC Response**

**Plant:** Generic

**Date of Event:** N/A

**Submittal Date:** 08/26/2020

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**Performance Indicator:** EP01, Drill/Exercise Performance

**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 46, lines 30 and 31, indicate that, “The notification timeliness criterion for this PI is met when the licensee makes contact with the first responsible State or local governmental agency within 15 minutes.”

**Event or circumstances requiring guidance interpretation:**

The Drill/Exercise Performance (DEP) indicator monitors timely and accurate licensee performance of classification of emergencies, notification of offsite authorities, and development of protective action recommendations (PARs) in drills, exercises and actual emergencies. It is the ratio, in percent, of timely and accurate performance of those actions to the total number of opportunities during the previous eight quarters.

Many sites have implemented, or are planning to implement, computer application-based methods to perform emergency notifications to offsite authorities. These methods would replace or augment the traditional method of notification made through a telephone call. Recognizing the greater use of electronic/internet-based means of notifications, the guidance in NEI 99-02 requires an interpretation to clarify how the timeliness criterion should be assessed when offsite authority notifications are performed using a computer application. Specifically, the interpretation should

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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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make clear when the 15-minute notification clock stops for an electronic notification sent via a computer application over the internet.

**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:**

The existing NEI 99-02 guidance sentence cited above appears in the second paragraph of the Purpose section for the DEP indicator. It is proposed to add a sentence immediately following it to clarify the timeliness criterion for notifications made using a computer application to send an electronic message. The clarification would make clear that the notification is timely when there is a confirmation that the message was accessed by at least one agency (which is functionally equivalent to the “first responsible State or local governmental agency”) within 15 minutes.

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

Starting on page 46, lines 30 and 31, add a new second sentence as shown below in italics:

*“The notification timeliness criterion for this PI is met when the licensee makes contact with the first responsible State or local governmental agency within 15 minutes. If a computer application is used to send an electronic notification message, then the notification timeliness criterion is met by a confirmation that the message was accessed (e.g., a read or opened receipt, or other acknowledgement that the notification message was displayed) by at least one agency within 15 minutes.” [Rest of paragraph is unchanged.]*

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

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

**Proposed NRC Response:**

The capability to notify offsite response organizations (OROs) within 15 minutes of declaring an emergency is outlined in Appendix E.IV.D.3. to 10 CFR Part 50. The existing guidance to meet this requirement is provided in the current revision of NEI 99-02. The NRC agrees with the proposed resolution to revise NEI 99-02 to provide for the

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use of computer-based notifications to OROs and for the 15-minute timeliness criteria clarification with the following changes to the proposed language.

“The notification timeliness criterion for this PI is met when the licensee makes contact with the first responsible State or local governmental agency within 15 minutes. *If a computer application is used to send an electronic notification message, then the notification timeliness criterion is met by a confirmation that the message was accessed (e.g., a read or opened receipt, other acknowledgement that the notification message was displayed, or validation of receipt by an independent phone call) by at least one agency within 15 minutes.*” [Rest of paragraph is unchanged.]

**RECOMMENDED FUTURE ACTION(S):**

- INFORMATION ONLY, MAINTAIN EPFAQ
- UPDATE GUIDANCE DURING NEXT REVISION