

Alexander, Ryan

From: Alexander, Ryan
Sent: Tuesday, March 30, 2021 7:25 AM
To: Van Der Kamp, David W.; Mocnik, Lawrence A.
Cc: Rollins, Jesse; Hedger, Sean
Subject: Request for Information: CNS EP Exercise Inspection (Week of May 24, 2021)
Attachments: RFI for CNS EP Exercise Insp May 2021.pdf

Mr. Van der Kamp/Mr. Mocnik:

As discussed during the inspection planning/kick-off call held yesterday (3/29/2021), attached is the **Request for Information (RFI) in support of the Cooper Nuclear Station EP Exercise Inspection which will be conducted the week of May 24, 2021.**

As discussed in yesterday's call, the biennial EP Exercise inspection for CNS will be limited to the use of Inspection Procedures (IP) 71114.01, 71114.04, and 71151 and will assess the station's conduct and critique of the biennial emergency preparedness exercise to be conducted that week. (We will NOT be reconducting the IP 71114.08 scenario review which we completed earlier in 2020 before you requested and were granted an exemption for postponement of the exercise to May 2021.)

Details of the requested materials are included in the attachment to this e-mail. Some of the materials are requested to be made available when onsite for the inspection, while others are requested to be provided prior to the onsite week for in-office inspection/review. If you are unable to complete the requests or have questions regarding them, please contact me at the phone number listed below to discuss.

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Thank you,

Ryan D. Alexander

Sr. Emergency Preparedness Inspector

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Office: 817-200-1195 (forwarded to mobile during COVID-19 PHE)



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Request for Information for EP Performance Indicator Verification Inspection

Dockets 05000298 (Cooper); Inspection Report 2021002

Inspection Procedure: 71114.01, 71114.04, & 71151

In-Office Prep: May 10 - 21, 2021

Onsite/Inspection Week: May 24 - 28, 2021

Please provide the following to support the inspection consistent with the methods and timeframes listed for each.

1) IP 71114.01: Exercise Evaluation

Items 1.a – 1.c are requested to be provided prior to the onsite exercise inspection (no later than COB on May 10, 2021) via the electronic portal of the station's choosing. If some of these materials are not readily available for electronic transmission, please inform the lead inspector as to which document(s) are not available electronically and instead provide those documents in hard copy for review starting on the first day of inspection:

- a) Copies of all Drill and Exercise Reports since the last biennial EP Exercise in CY2018, including standalone drills, team drills, dress-rehearsals, etc.
- b) In addition, a copy of the 2016 and 2018 Biennial EP Exercise Reports (if not provided as part of Item 1.a).
- c) Listing of all EP-related Corrective Action Documents/CRs generated since the last biennial EP Exercise in CY2018, in a sortable/searchable format. (Specific full CR documents may be subsequently requested based on sampling and review by the inspectors.)
- d) Copy of all Extent of Play agreements between FEMA Region VII, and the States of Nebraska and Iowa, associated with the May 25, 2021 plume phase exercise.

Basis: Consistent with the NRC Temporary Staff Guidance ([NSIR/TSG 2020-02, "Temporary Staff Guidance – Additional Guidance for EP Inspections During the PHE"](#)), the NRC inspectors are expected to obtain and review Extent of Play agreements for both the onsite and ORO performance prior to the conduct of the exercise, depending on the applicable regulatory requirements the licensee chooses to demonstrate (e.g., 10 CFR Part 50, Appendix E, Section IV.F.2.b and/or 2.c). Specific guidance in Section 3.9 and Attachments 1 and 2 of the TSG describe the bases and scope of the review.

Items 1.e – 1.g are requested to be provided at various points during the onsite inspection week as noted below:

- e) First day of Inspection (5/24/2021) – Please provide hard/paper copies of the final, full Exercise Manual, one copy per inspector (4 total).
- f) First day of Inspection (5/24/2021) – Provide a single hard copy document of the current Cooper Emergency Plan and complete set of Emergency Plan Implementing Procedures. These will be used/referenced by the inspection team and returned at the conclusion of the exercise inspection week.

- g) No later than 9:00 AM on Wednesday, 5/26/2021 (morning after the exercise) – Provide copies of all documents generated by participants (players, controllers, and evaluators) in the conduct of the exercise on 5/25/2021, separated by Emergency Response Facility is desired.

2) 71114.04: EAL and Emergency Plan Changes

Items 2.a – 2.e are requested to be provided prior to the onsite exercise inspection (no later than COB on May 10, 2021) via the electronic portal of the station's choosing. If no materials associated with any of the items in 2.b – 2.d below were generated since January 2021, simply stating as much is responsive to the request.

- a) Copy of the 50.54(q) procedure (current revision)
- b) Copy of all the 50.54(q) evaluations completed since January 2021
- c) Listing of all of the 50.54(q) screens performed since January 2021
- d) Copy of all evaluations completed (if any) to implement compensatory measures/contingency plans to ensure E-Plan requirements continued to be met during COVID-19 Public Health Emergency, whether documented per the 50.54(q) process or some other process, completed since January 2021.

3) IP 71151: PI Verification (ERO Participation, DEP, and ANS) – ANNUAL review

Items 3.a – 3.i are requested to be provided prior to the onsite exercise inspection (no later than COB on May 10, 2021) via the electronic portal of the station's choosing. If some of these materials are not readily available for electronic transmission, please inform the lead inspector as to which document(s) are not available electronically and instead provide those documents in hard copy for review starting on the first day of inspection:

**Please provide the applicable Performance Indicator data for:
3rd Quarter 2020 through 1st Quarter 2021 (3 quarters)**

- a) Copy of the station procedure(s) for EP Performance Indicator data collection and submission.
- b) List of the DEP opportunities used in developing the PI values for the 3 quarters.
 - i) Based on the review of the DEP Opportunities provided per 3.b, the inspectors will request copies of supporting documentation used to assess a SAMPLING of DEP opportunities in the 3 quarters, which *may* include: (1) Drill/Exercise/LORT session reports, (2) actual declared emergency reports/assessments (if any), and (3) copies of notification forms associated with each of the DEP opportunities.

The lead inspector intends to provide the list of specific DEP opportunities selected for this sampling as part of a Supplemental RFI to be provided back to the licensee in the week prior to the onsite inspection.

- c) Copies of all Condition Reports (CRs), including any causal evaluations, related to DEP opportunity failures during the 3 quarters.

- d) Copies of quarterly qualification rosters (or similar) for the key ERO members who were included in the ERO Participation data for the 3 quarters.
- e) Copies of qualification records for the key ERO members who were included in the ERO Participation data for the 3 quarters
- f) Copies of all CRs related to ERO qualification issues/deficiencies during the 3 quarters.
- g) Copy of the station procedure for ANS Siren Testing.
- h) Copies of all ANS Siren Test reports for the 3 quarters.
- i) Copies of all CRs related to ANS Siren failures and/or corrective maintenance during the 3 quarters.

If there are any challenges or questions related to providing the requested materials, please contact the lead inspector (Ryan Alexander, phone: 817-200-1195), at the station's earliest convenience.

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