

2021 FOF Inspection Hardship Criteria Determinations

5/10/2021

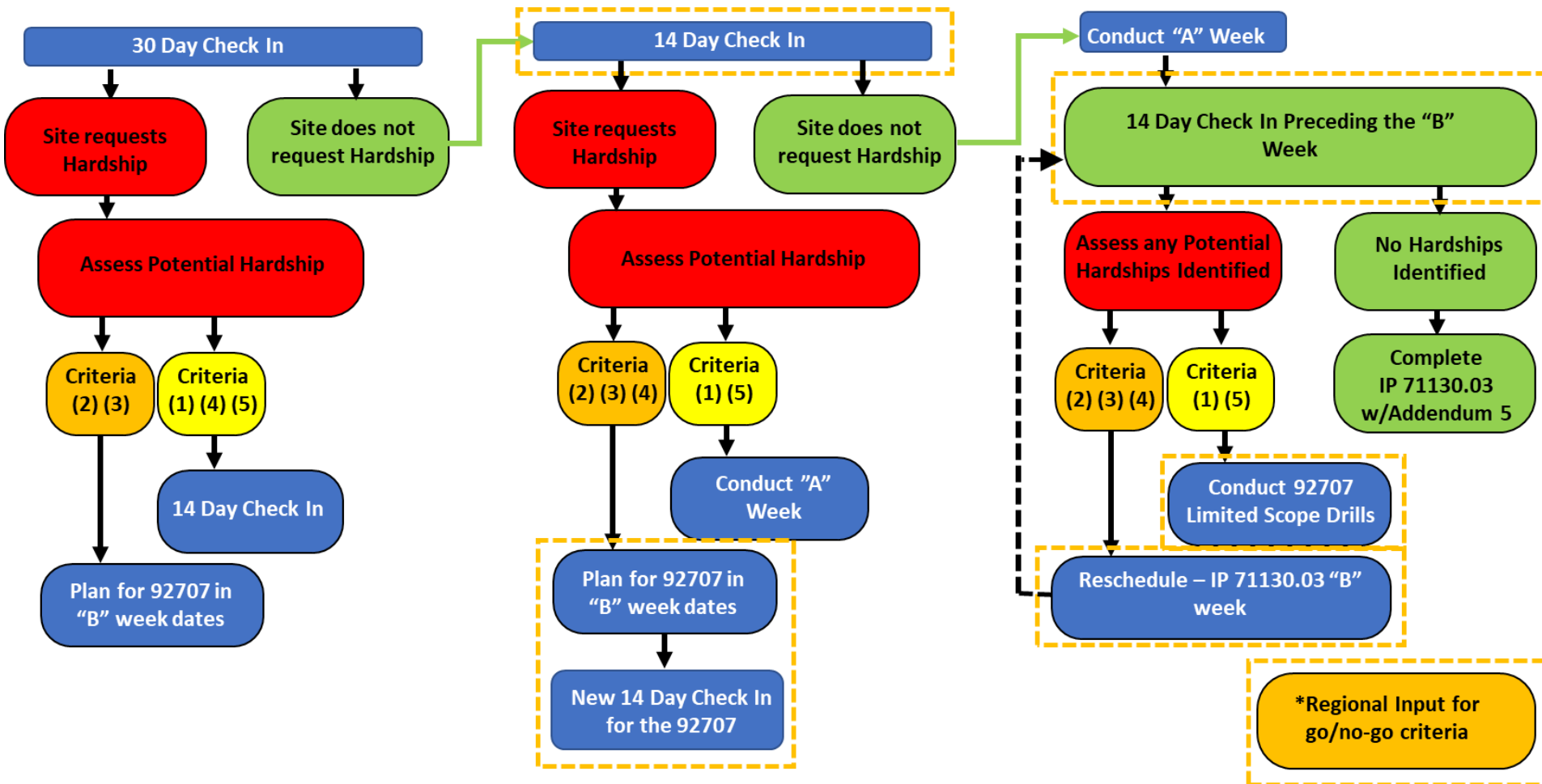
Content

- Hardship Criterion 5
- Flowchart/Rescheduling
- Regional Input (go/no-go)

Hardship Criteria

1. significant number of site-security personnel are positive or under quarantine due to COVID-19 impacts, which places an unreasonable burden on the licensee's ability to staff positions required for conduct of IP 71130.03;
2. the inspection dates conflict with safety-related and/or emergent work that was rescheduled due to COVID-19;
3. the inspection dates conflict with an outage that was rescheduled due to COVID-19;
4. positivity rates in area surrounding site make travel to the site a greater risk to licensee individuals needed to support the inspection of IP 71130.03; or
5. due to site protocols for COVID-19 mitigation measures, use of certain positions (e.g., bullet resistance enclosures (BREs), central alarm station (CAS), secondary alarm station (SAS)) are restricted, which will pose an unreasonable burden on licensee or make it unlikely for overall outcome of exercises to be characterized (team lead will provide recommendation to branch chief for consideration for hardship).

Flowchart



Regional Input (go/no-go)

Regional Inspection Panel

- Purpose – Balances the importance of protecting the health and safety of NRC inspectors and licensee site personnel along with the need to conduct effective oversight that supports NRC's critical safety mission.
- Actions – Evaluates available information for appropriateness of increasing or decreasing site coverage and travel to sites for inspections or other activities.
 - On-site COVID-19 conditions and trends
 - Local COVID-19 conditions around the site and the communities, including directions from local authorities
 - Plant risk issues and other considerations
- Outcomes
 - Informs the level of presence at the site by resident inspectors
 - Provides information for decision-makers on whether travel to a site should occur

Backup Slides

TSG Section 3.1 General Overview and Guidance

Based on an evaluation of the options to conduct FOF exercises during the COVID-19 PHE, staff plans to use the existing IP 71130.03 framework with COVID-19 mitigation protocols (included as Addendum 5 to the IP) as its primary approach, and to use IP 92707 when hardship conditions do not permit use of IP 71130.03.

The IP 71130.03 framework is preferred, when site-specific conditions permit, because it provides a holistic assessment of performance, involves proven methods for mitigating conflicts of interest, and is a well-established framework. However, in some cases, site-specific conditions due to COVID-19 impacts on staffing and circumstances such as scheduling conflicts related to execution of critical safety activities and other conditions pertaining to COVID-19 may necessitate use of the revised IP 92707.

Criteria for Use of IP 71130.03 or IP 92707

Criterion “5”

- *due to site protocols for COVID-19 mitigation measures, use of certain positions are restricted, which will pose an unreasonable burden on licensee or make it unlikely for overall outcome of exercises to be characterized*
 - This criterion is based on the completed IP 71130.03 Planning week inspection activities and that the licensee has reviewed the developed scenario.
 - Team Lead and site should work together to develop solutions that will keep the integrity of the proposed scenario and meet the objectives of the IP.
 - The site should look at all options to conduct the exercise that would still meet COVID-19 protocols.

Use of IP 71130.03 or IP 92707

Step 1	At the 30 day window (prior to planning week) – TL contact site or site contacts NRC and provides update
Step 2	At 14 day mark (prior to planning week) – site will report COVID-related conditions to NRC
	Conditions are unsuitable (COVID-related): NRC would plan to forgo visiting site for A Week; plan to use the 92707 during site B Week. (Note: If conditions are still unsuitable prior to B Week, NRC would reschedule 92707)
	Conditions are reasonable: NRC will arrive at A Week; plan for 71130.03 modified

Use of IP 71130.03 or IP 92707 (cont'd)

Step 3	If following planning week, it is determined site unable to use CAS/SAS, BREs, or alternatives due to COVID-19, (14 days prior to return for B Week) NRC will decide if appropriate to use 92707
	If during planning week, scenario can be run safely, NRC will return for B Week to use 71130.03 modified
Step 4	If conditions change from A to B Week (COVID-related):
	If cannot use 71130.03 due to COVID, revert to use 92707 for B Week
	If site A or B Week cannot be used for 92707 due to COVID, NRC will look to reschedule later in calendar year or 2022