

PART 52, EMERGENCY PREPAREDNESS PROGRAM

PROGRAM APPLICABILITY: IMC 2504 App B

82002-01 INSPECTION OBJECTIVE

01.01 To verify, during plant construction (and prior to fuel load), for a plant licensed in accordance with **Title 10 of the Code of Federal Regulations (10 CFR)** Part 52, the operational readiness of the licensee's Emergency Preparedness (EP) Program and its ability to transition to monitoring under the **Operating Reactor Assessment Program**.

01.02 To determine whether the licensee has an EP program that **complies with the** requirements of 10 CFR Parts 50 and 52.

82002-02 INSPECTION REQUIREMENTS

02.01 Conduct the inspection program in accordance with IMC 2504, "Construction Inspection Program – Inspection of Construction and Operational Programs."

02.02 Prepare an inspection plan identifying the **appropriate** attachments **described** in paragraphs 02.04 **through** 02.06.

02.03 If the construction site is co-located with one or more operating reactors, discuss the inspection plan with appropriate management and the Resident Inspectors.

02.04 For construction sites where the new plant uses similar technology as **a** co-located operating reactor at the site, inspect the following aspects of the EP program:

- a. **82002.01**, "Facilities and Equipment"
- b. **82002.04**, "Emergency Preparedness Exercises," (new unit can replace existing unit, in standing EP Exercise schedule)
- c. **82002.05**, "Emergency Response Organization, On-Shift Staffing and Augmentation Drills"
- d. **82002.06**, "Emergency Response Organization, Dose Assessment Drills"

02.05 For construction sites where the new plant uses a different technology than a co-located operating reactor at the site, inspect the following aspects of the EP program:

- a. **82002.01**, "Facilities and Equipment"
- b. **82002.02**, "Procedure Quality"
- c. **82002.03**, "Review of Exercise Objectives and Exercise Scenario for Power Reactors"
- d. **82002.04**, "Emergency Preparedness Exercises"
- e. **82002.05**, "Emergency Response Organization, Staffing Drills"
- f. **82002.06**, "Emergency Response Organization, Dose Assessment Drills"

02.06 For construction sites without an existing operating reactor, or where the new plant is operated by a different licensee, inspect the following aspects of the EP program:

- a. 82002.01, "Facilities and Equipment"
- b. 82002.02, "Procedure Quality"
- c. 82002.03, "Review of Exercise Objectives and Exercise Scenario for Power Reactors"
- d. 82002.04, "Emergency Preparedness Exercises"
- e. 82002.05, "Emergency Response Organization, On-Shift Staffing and Augmentation Drills"
- f. 82002.06, "Emergency Response Organization, Dose Assessment Drills"
- g. 82002.07, "Operational Status of the Emergency Preparedness Program"

02.07 If the licensee has performed any joint EP drills or exercises (i.e., with offsite response organizations (OROs)) during the construction phase, review **weaknesses and corrective actions identified** in those offsite drills and exercises. Determine if licensee performance adversely affects the ability of OROs to meet their emergency response commitments (i.e., are licensee-provided facilities and equipment adequate to support OROs at the Emergency Operations Facility, Joint Information Center).

02.08 Develop information to support the determination of whether the EP program is operationally ready and can transition to the **Operating Reactor Assessment Program** when appropriate.

82002-03 INSPECTION GUIDANCE

Inspectors may use Inspection Procedure (IP) 71114, "Reactor Safety Emergency Preparedness," and associated attachments or enclosures, as additional guidance to inform the use of IP 82002 during plant construction and prior to fuel load. For example, the use of IP 71114.04 to support the inspection of Emergency Plan and Emergency Action Level changes, as appropriate. However, the significance of any potential findings should be risk-informed based on the radiological risk posed to the public prior to fuel load.

03.01 Completion of these procedures will help to ensure that the licensee has adequately established emergency preparedness operational programs and has adequately completed pre-operational testing. Because the EP areas are related, conduct this inspection, to the extent possible, in parallel with inspections for IMC 2503 "Construction Inspection Program: Inspections of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Related Work." The same inspection report may document the results of each independent inspection.

03.02 Emergency Response Organization staffing and dose assessment drills, as described in Attachments 82002.05 and 82002.06, may be combined.

03.03 No inspection guidance.

03.04 – 03.06 General Criteria

The performance of the listed attachments in each paragraph (.02.04 - .02.06) represents a graded-approach to verifying the operational readiness of the licensee's EP program. Depending on the site and circumstances, where the new reactor will be built, the inspection plan, and the attachments to be performed, will be tailored to each specific site.

03.04 - 03.06 Site-Specific Criteria

03.04 For construction sites where the new plant uses similar technology as the co-located operating reactor, refer to the inspection guidance in the topics-specific attachments to this procedure (i.e., .01, .04 - .06).

03.05 For construction sites where the new plant uses a different technology than a co-located operating reactor, refer to inspection guidance in the topic-specific attachments to this procedure (i.e., .01 - .06).

03.06 For construction sites without an existing operating reactor, as well as for sites where the new plant is operated by a different licensee than a co-located operating reactor at the site, refer to the inspection guidance in the topic-specific attachments to this procedure (i.e., .01-.07).

03.07 It may be necessary to review the training program to support the inspection objectives. This may include lesson plans, training policies, training schedules, records, instructional tapes, examinations, quizzes and attendance records. Inspectors may use interviews with training supervisors, instructors and students to determine whether the training program is generally consistent with the guidance of NUREG-0654, Section II.O. Requirements for training may be found in 10 CFR 50.47(b)(14) and Section IV.F of 10 CFR Part 50, Appendix E. The following for EP training program inspection is suggested below:

- a. Review the training records of key emergency response organization members and all new personnel, all Shift Supervisors and a selection of other emergency response members (as defined in Nuclear Energy Institute (NEI) document NEI 99-02). Verify that initial and refresher training has been completed, in accordance with Emergency Plan commitments.
- b. Discuss training courses with individuals selected from the training records to verify whether the required training was **effective**, and whether appropriate tests to determine the effectiveness of the training were administered. **Interview** those responsible for accident detection and classification to determine the **effectiveness of the** training they received on the licensee's emergency action level (EAL) procedures. The interviews need not gauge mastery of the training material if performance drills will be conducted for the trainee population being interviewed.

03.08 No inspection guidance.

03.09 Inspection of some ERO performance issues may be supplemented by observation of emergency response personnel in performance drills. Licensee performance in drills and during other licensee problem resolution efforts, as documented in the inspection report, will form the basis for **determining** operational readiness. As part of **this** determination process, the NRC will verify that the licensee adequately **corrected** all deficiencies identified. Enforcement actions will be in accordance with IMC 2505, IMC 0613, and the Commission's Enforcement Policy related to construction.

82002-04 INSPECTION RESOURCES

It is expected that implementation of all attachments of this procedure **will take approximately** 407 hours. However, it is not expected that all attachments **will** be implemented for a single site. Individual resource estimates are provided in the attachments.

82002-05 REFERENCES

Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 5, June 6, 2005.

NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980 (Microfiche Address: 01997/314 - 01998/71).

Information Notice 83-28, "Criteria for Protective Action Recommendations for General Emergencies" (Microfiche Address: 18441/001-119).

EPA-400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," May, 1992.

NUMARC/NESP-007, Revision 2, "Methodology for Development of Emergency Action Levels," January 1992.

Information Notice 87-58, "Continuous Communications Following Emergency Notifications," (Microfiche Address: 43404/176-288).

NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, July 2007.

NEI 99-01, "Methodology for Development of Emergency Action Levels," Revision 5, February 2008.

NEI 07-01, "Methodology for Development of Emergency Action Levels (for) Advanced Passive Light Water Reactors," Revision 0.

RIS 2003-12, "Clarification of NRC Guidance for Modifying Protective Actions," June 24, 2003.

END

Attachments:

As listed in Sections 02.04, 02.05, and 02.06 of this IP
Revision History for IP 82002

Attachment1 - Revision History for IP 82002

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML111030555 11/08/2011 CN 11-030	Initial issue to support inspections of construction programs described in IMC 2504, Construction Inspection Program: Inspection of Construction and Operational Programs. Completed 4-year search of historical CNs and found no commitments related to this Inspection Procedure.	N/A	N/A
N/A	ML1497A167 10/28/2014 CN 14-026	This update is being issued to make minor editorial changes including formatting, the deletion of one appendix, corrections to reflect the correct titles of two appendices, and the removal of one reference.	N/A	N/A
N/A	ML20058J818 03/04/20 CN 20-014	This update is being issued to allow consideration of applicable ROP Inspection Procedures (IPs) in support of construction inspections in the Emergency Preparedness area (IP 71114 and associated sections). Also makes various minor editorial changes.	N/A	N/A