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## INSPECTION PROCEDURE 82002

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### PART 52, EMERGENCY PREPAREDNESS PROGRAM

#### PROGRAM APPLICABILITY: 2504

#### 82002-01 INSPECTION OBJECTIVE

01.01 To verify, during plant construction (and prior to fuel load), for a plant licensed in accordance with 10 CFR Part 52, the operational readiness of the licensee's Emergency Preparedness (EP) Program and its ability to transition to monitoring under the reactor oversight process.

01.02 To determine whether the licensee has an EP program that is in compliance with NRC 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 required attachment(s) (as delineated in paragraph(s) 02.04 – 02.06) appropriate for the construction site. Include the resources required and the inspection schedule.

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

- a. Facilities and Equipment (Attachment 01)
- b. Emergency Preparedness Exercises (new unit can replace existing unit, in standing EP Exercise schedule) (Attachment 04)
- c. Emergency Response Organization, Staffing Drills (Attachment 05)
- d. Emergency Response Organization, Dose Assessment Drills - (Attachment 06)
- e. Emergency Response Organization, Augmentation Drills (Attachment 07)

02.05 For new reactor 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. Facilities and Equipment (Attachment 01)
- b. Procedure Quality (Attachment 02)

- c. Review of Exercise Objectives and Scenarios for Power Reactors (Attachment 03)
- d. Emergency Preparedness Exercises (Attachment 04)
- e. Emergency Response Organization, Staffing Drills (Attachment 05)
- f. Emergency Response Organization, Dose Assessment Drills - (Attachment 06)
- g. Emergency Response Organization, Augmentation Drills (Attachment 07)

02.06 For new reactor 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, inspect the following aspects of the EP program:

- a. Facilities and Equipment (Attachment 01)
- b. Procedure Quality (Attachment 02)
- c. Review of Exercise Objectives and Scenarios for Power Reactors (Attachment 03)
- d. Emergency Preparedness Exercises (Attachment 04)
- e. Emergency Response Organization, Staffing Drills (Attachment 05)
- f. Emergency Response Organization, Dose Assessment Drills - (Attachment 06)
- g. Emergency Response Organization, Augmentation Drills (Attachment 07)
- h. Operational Status of the Emergency Preparedness Program (Attachment 08)

02.07 Notify the licensee of the inspection, and any resources needed in advance of or during the inspection. This may include: training program information, development of scenarios, the need for personnel to perform in drills, access to equipment, access to facilities and access to the simulator.

02.08 If the licensee has performed any joint EP drills or exercises (i.e., with offsite response organizations [OROs]) during the construction phase, review findings of those offsite drills and exercises to determine if licensee performance adversely affects the ability of OROs to meet their emergency response commitments (e.g., are licensee-provided facilities and equipment adequate to support OROs at the Emergency Operations Facility, Joint Information Center).

02.09 Develop information to support the determination of whether the EP program is operationally ready and can transition to the reactor oversight process when appropriate.

## 82002-03 INSPECTION GUIDANCE

03.01 Completion of these procedures will help to ensure that the emergency preparedness operational programs have been adequately established per regulatory requirements and that the appropriate pre-operational testing has been completed. As noted in IMC 2504, "Construction Inspection Program – Inspection of Construction and Operational Programs, section 2504-03, "Applicability," the inspection procedures that are performed under its cognizance shall be performed in parallel with, but independent of, IMC 2503, "Construction Inspection Program: Inspections of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Related Work." IMC 2504 inspections relating to emergency preparedness may be performed concurrently with IMC 2503 inspections relating to emergency preparedness, as the inspectable areas are related. Hence, the results of each inspection may be documented in the same inspection report.

03.02 The inspector must prepare an inspection plan for the construction site. The inspection plan must include the resources required and the inspection schedule. ERO staffing and dose assessment drills, as described in Attachments 5 and 6, may be combined or performed separately (as necessary). This decision is left up to the discretion of the inspector planning the inspections.

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 new reactor construction sites where the new plant uses similar technology as the co-located operating reactor at the site, the inspector must refer to the inspection guidance in the following topics-specific attachment(s) (01, .04 -.07) to this procedure.

03.05 For new reactor construction sites where the new plant uses a different technology than a co-located operating reactor at the site, the inspector must refer to inspection guidance in the following topic-specific attachment(s) (.01 - .07) to this procedure:

03.06 For new reactor 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, the inspector must refer to the inspection guidance in the following topic-specific attachments (.01 - .08) to this procedure:

03.07 A review of the training program may be necessary to support the inspection objectives. This may include lesson plans, training policies, training schedules, records, instructional tapes, examinations, quizzes and attendance records. Interviews with training supervisors, instructors and students may be used 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)(13) and Section IV.F of 10 CFR Part 50, Appendix E. Guidance for EP training program inspection is suggested below:

- a. Review the training records of key (as defined in NEI 99-02) emergency response organization members and all new personnel, all Shift Supervisors and a selection of others. Verify that initial and refresher training has been completed in accordance with Emergency Plan commitments.
- b. Discuss training courses with various individuals (names selected from the training records) to verify whether the required training was provided and whether appropriate tests to determine the effectiveness of the training were administered. Those responsible for accident detection and classification should be interviewed to determine whether they received training 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 other licensee problem resolution efforts, as documented in the inspection report, will form the basis of the determination of operational readiness. As part of the determination process, the NRC will verify that the licensee adequately corrects 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 would take 407 hours. However, it is not expected that all attachments would 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, Rev. 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).

EPPOS-2, "Emergency Preparedness Position (EPPOS) on Timeliness of Classification of Emergency Conditions," August 1, 1995.

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

Exhibit 1: Revision History for IP 82002

Attachments: as listed in sections 02.04, 02.05, and 02.06 of this IP

# Exhibit 1

## Revision History for IP 82002

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	11/08/2011 CN 11-030 ML111030555	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.	None	N/A	N/A