

# NRC INSPECTION MANUAL

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## INSPECTION PROCEDURE 82201

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### EMERGENCY DETECTION AND CLASSIFICATION

PROGRAM APPLICABILITY: 2515

SALP FUNCTIONAL AREA: EMERGENCY PREPAREDNESS (SOEP)

#### 82201-01 INSPECTION OBJECTIVE

To determine that the licensee has a standard emergency classification and action level scheme, the bases of which include facility systems, effluent parameters, and projected offsite doses.

#### 82201-02 INSPECTION REQUIREMENTS

02.01 Verify that the emergency plan implementing procedures (EPIPs) contain measurable and observable emergency action levels (EALs) based on in-plant conditions, onsite and offsite radiological monitoring results, and offsite dose projections.

02.02 Determine whether the licensee has reviewed the EALs with State and local authorities as required.

02.03 Determine whether the emergency event classifications in the EPIPs are consistent with those in the emergency plan, meet regulatory requirements, and that the classification procedure(s) has provisions for prompt and correct classifications by the licensee.

02.04 Verify that there is an individual on site at all times who has the authority and responsibility to immediately and unilaterally classify events and initiate any emergency actions, including recommending protective measures to offsite officials.

02.05 Determine whether the licensee has adequate procedures to direct the user to classify emergencies.

02.06 Verify that the licensee's EALs are consistent in range, units, and conversion factors with appropriate control room instrumentation and that the decisional aids used for event classification in the control room, the Technical Support Center (TSC), and the Emergency Operations Facility (EOF) are readily available and consistent with the EALs.

General Guidance. NRC inspectors should limit their evaluations conducted in accordance with this procedure to the staff, activities, records, and facilities of the licensee. Where necessary to verify licensee performance, concerning interactions with organizations and persons involved in offsite emergency preparedness, inspectors should limit their activities to reviews of pertinent records available through the licensee. If additional information is needed about offsite emergency preparedness, it should be obtained from FEMA.

Guidance for interviews and walkthroughs with licensee staff covering the understanding and performance of emergency detection and classification responsibilities is included in Inspection Procedure 82206.

### Specific Guidance

03.01 Requirements for EALs may be found in 10 CFR 50.47(b)(4) and 10 CFR Part 50, Appendix E, Section IV.B. Some licensees will have event-based EALs. Some licensees will have symptom-based EALs that often are based on the status of fission product barriers. Some licensees will have EALs based on the status of critical safety functions and their relationship to the status of fission product barriers. In all cases it should be possible to compare EAL schemes to the example initiating conditions in Appendix 1 of NUREG-0654 or NUMARC/NESP-007, Revision 2, and this comparison should result in equivalent classifications. The licensee should indicate which methodology has been utilized.

03.02 State and local officials responsible for offsite notification and protective action decisionmaking should be given an opportunity, on an annual basis, to review the EALs used for event classification and for making protective action recommendations. Documentation to verify this could be a letter from the offsite authorities (see 10 CFR Part 50, Appendix E, Section IV.B).

03.03 The inspector should review the classification procedures and focus on potential impediments or errors that could lead to incorrect or untimely event classification. It is important that emergencies not be misclassified. Misclassification can be minimized if the classification procedures are written so that a user does not have to search through a lengthy list of similar events, several of which may relate to different classification levels. Requirements for classification may be found in 10 CFR 50.47(b)(4) and 10 CFR Part 50, Appendix E, Section IV.B.

03.04 The emergency plan, the EPIPs, or other relevant documentation should provide a list of individuals who are on site at all times and who have been given the authority and responsibility to initiate emergency actions.

03.05 A small sample of these procedures should be reviewed and discussed with appropriate personnel to determine whether classification information is included. While not required, it is good practice for the Emergency Operating, Alarm, and Abnormal Occurrence Procedures to clearly direct the user to classify an emergency in a timely manner.

03.06 Several EALs should be examined for consistency with range, units, and conversion factors used in the control room. Decisional aids (such as nomograms) used for event classification in the control room, the TSC, and the EOF should be readily available and should be consistent with the EALS.

82201-04 INSPECTION RESOURCES

For planning purposes, the estimated time to complete this procedure is 15 hours.

82201-05 REFERENCES

Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 3, August 1992.

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).

Inspection Procedure 82206, "Knowledge and Performance of Duties (Training)

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

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

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