

NRC INSPECTION MANUAL

PEPB

INSPECTION PROCEDURE 82202

PROTECTIVE ACTION DECISION MAKING

PROGRAM APPLICABILITY: 2515

SALP FUNCTIONAL AREA: EMERGENCY PREPAREDNESS (SOEP)

82202-01 INSPECTION OBJECTIVES

To determine whether the licensee maintains a 24-hour-a-day capability to assess and analyze emergency conditions and to make recommendations to protect the public and on-site workers.

82202-02 INSPECTION REQUIREMENTS

02.01 Verify that the authorities and responsibilities assigned by the licensee to assess the accident and to make recommendations for protective actions are clearly reflected in the emergency plan implementing procedures (EPIPs) and are consistent with the emergency plan.

02.02 Determine that the criteria and methodology for making offsite protective action decisions are clearly reflected in the implementing procedures.

02.03 Verify that the implementing procedures contain criteria concerning protective actions for nonessential onsite personnel.

02.04 Determine that the licensee has the capability to deliver timely protective action recommendations to the appropriate offsite authorities.

82202-03 INSPECTION GUIDANCE

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 protective action decision making responsibilities is included in Inspection Procedure 82206.

Specific Guidance

03.01 The organizational elements, responsibilities, and authorities in the EPIPs for accident assessment and protective action recommendations should be compared with those in the emergency plan. Particular attention should be given to organizational structure, reporting chains, personnel interactions, and staffing. Requirements for the emergency organization may be found in 10 CFR 50.47(b)(1) and (2) and 10 CFR Part 50, Appendix E, Section IV.A.

03.02 The emergency plan implementing procedures should clearly specify a methodology that enables the licensee to make protective action recommendations appropriate for the particular plant conditions (see NUREG-0654, Appendix 1, and IE Information Notice 83-28, dated May 4, 1983).

03.03 The procedures should specify protective actions for onsite nonessential personnel, including evacuation for Site Area Emergencies and General Emergencies. This information is also normally included in the licensee's General Employee Training Program.

03.04 Requirements for protective actions may be found in 10 CFR 50.47(b)(10). General Guidance is provided in NUREG-0654, Part II, Sections I and J. The key items to discuss with the licensee are listed below:

- a. The licensee has provisions for reaching offsite officials with the authority and responsibility for protective action decision making on a 24-hour basis.
- b. There is a procedure(s) to allow offsite protective action recommendations to be made at all times by the licensee within 15 minutes of the determination that an emergency exists.
- c. The licensee has predetermined criteria for making protective action recommendations on the basis of plant conditions (even if no radioactive release is under way) or on projected doses.
- d. The licensee has taken steps to understand how offsite officials use the licensee's protective action recommendations to make protective action decisions. If the decision-making criteria of the offsite officials are not consistent with the licensee's criteria, confirm that the licensee understands the differences and has informed the offsite officials and the NRC Regional Response Staff of the differences.

82202-04 INSPECTION RESOURCES

For planning purposes, the estimated on-site time to complete this procedure is 10 hours.

82202-05 REFERENCES

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

NUREG/CR-2925, "In-Plant Considerations for Optimal Offsite Response to Reactor Accidents," March 1983 (Microfiche Address: 17738/096-245).

Information Notice 83-28, "Criteria for Protective Action Recommendations for

General Emergencies" (Microfiche Address: 18441/001-119).
NUREG-0396, "Planning Basis for the Development of State and Local Government
Radiological Emergency Response Plans in Support of Light Water Nuclear Power
Plants," December 1978 (Microfiche Address: 00567/260 - 00568/40).

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)

EPA-520/1-75-001-A, "Manual of Protective Actions for Nuclear Incidents," January
1990.

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