

## C. EVALUATION AREA MODULES

### 1. Format of Evaluation Area Module

The Module has three main pages; the sub-element and criterion, the narrative, and the issues section.

The first section of the module is the header that the evaluator must complete. Following the header is the name of the Evaluation Area and the specific sub-element and criterion for that particular module. The criterion lists all the NUREG planning elements that pertain to the particular sub-element. If an exercise issue is identified it is the responsibility of the evaluator to assign the specific NUREG element(s) to the issue.

There is only one question on the modules: Was the Criterion adequately demonstrated? The evaluator has to decide one of three choices: yes, no, or not applicable. If the answer is NO, then all exercise issues should be addressed on the Issues page: one Issue page per issue.

**YES** means that the criterion was adequately demonstrated. If the demonstration included a deviation from the plan, then an issue page should be written with a recommendation to change the plan. The narrative should have a description of what occurred.

**NO** means that the criterion was not adequately demonstrated and that the action or inaction did/could have an effect. If there is no effect, there is no exercise issue (i.e., Deficiency or Area Requiring Corrective Action).

**N/A** means “not applicable” and is used to designate that the activity or functions was either (1) not required to be demonstrated or (2) the scenario did not drive the actions to provide the opportunity to demonstrate this activity. (In the event a module is assigned and the facility does not have that responsibility, the RAC Chair should be notified so that it may be deleted from that facility in the Region’s tracking system.)

The intent further describes the criterion. Each sub-element has an Extent-of-Play establishing what is to be observed to adequately demonstrate this criterion. There can also be a Regional Extent-of-Play in addition to the basic one. A Regional Extent-of-Play is an agreement between the FEMA Regional office and applicable OROs regarding modifications to the basic extent-of-play. Optimally, both would be included in the evaluator packet on this form.

The second page is the Issue for Criterion page. The evaluator for each issue must complete this. It will be the decision of the RAC Chairperson whether the issue would be considered a Deficiency, ARCA, plan issue, or not an issue. There are five elements that must be addressed in writing an issue: Condition, Possible Cause, Reference, Effect, and Recommendation.

The third page is the narrative. Here the evaluator presents the observations regarding this particular component of the exercise process. The narrative should include “who, what, when, why, where, and how.” Any previous outstanding Area Requiring Corrective Action (ARCA) that is corrected during the exercise must be identified and discussed how it was adequately

demonstrated and whether the evaluator considers it closed. If an ARCA was not adequately demonstrated the evaluator must also describe why it was not adequately demonstrated. Should there be any new issues identified, the evaluator must describe these in the narrative.

## **2. How To Use the Evaluation Module**

The Module should be reviewed prior to arriving at the evaluation site. During the exercise/drill the evaluator should observe and take notes. Assuming the evaluator is familiar with the REP Exercise Preparation Guide, there is no need to take the evaluation module to the location. The evaluator is thus freed up to observe, take notes, and ask questions. Afterwards, the module should be reviewed again while preparing the narrative of what was observed and the conclusion of whether the criterion was adequately demonstrated or not.

## **3. How To Write a Narrative**

As the “eyes and ears of the RAC Chairperson,” the evaluator must write a complete narrative of the activities observed during the exercise. However, it is imperative that the narrative be explicitly geared to the particular criterion and sub-area, e.g., Mobilization should not include a discussion of direction and control or EAS messages.

As a guide, the evaluator should prepare the narrative by considering “who, what, when, why, where, and how” to describe activities. Any outstanding ARCAs should be addressed and the discussion should include how the ARCA was corrected and closed or why it should remain open. New exercise issues require a discussion of what occurred. The narrative should support the evaluator’s “yes” or “no.”

## **4. How To Write an Issue**

In addition to being included in the narrative, all new and continued exercise issues must have an Issues page completed. Completion of this page will also assist the evaluator in organizing events and thoughts that led to the issue being identified. The issue has five components to it that the evaluator must complete.

1. Condition: describe the inadequacy
2. Possible Cause: what created the issue - responsibility
3. Reference: cite the NUREG-0654 element (see module criterion and select the appropriate one, cite regulation, and plan, if appropriate)
4. Effect – a discussion of what resulted or could have resulted due to this issue
5. Recommendation: suggestions on how to correct the issue

**REMEMBER:** evaluators do not classify issues. Only the RAC Chairperson has that authority.