

Commonwealth Edison Company
Braidwood Generating Station
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January 26, 2000
BW000004

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555 - 0001

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Subject: Submittal of Changes to Emergency Plan Implementing Procedures

In accordance with 10 CFR 50, Appendix E, Section V, "Implementing Procedures", we are reporting to the NRC several changes made to the Braidwood Station Emergency Plan Implementing Procedures (i.e., BwZPs). These changes were implemented on January 13, 2000. This submittal is required to be submitted within 30 days. Therefore, this submittal is due by February 14, 2000. The changes to these procedures do not decrease the effectiveness of the Braidwood Emergency Plan and continue to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E.

Attachment 1, "Summary of Changes", contains a brief summary of the changes made to each of the BwZPs. Attachment 2, "Implementing Procedures", contains the revised BwZPs. Changes are indicated in the attached procedures by revision bars.

If you have any questions about this letter, please contact Mr. T. W. Simpkin (815) 458-2801, extension 2980.

Respectfully,

A handwritten signature in black ink, appearing to read "T. J. Tulon", is written over a printed name.

Timothy J. Tulon
Vice President
Braidwood Station

TJT/SB/daj

Attachments: Attachment 1 – Summary of Changes
Attachment 2 – Implementing Procedures

cc: Regional Administrator – NRC Region III (two copies)
NRC Senior Resident Inspector – Braidwood Station

A045

Attachment 1

Summary of Changes

1. BwZP 1000-1A2, "Alert Checklist"
The computer callout password was changed.
2. BwZP 1000-1A3, "Site Emergency Checklist"
The computer callout password was changed.
3. BwZP 1000-1A4, "General Emergency Checklist"
The computer callout password was changed.
4. BwZP 1000-5, "Off Hours Augmentation"
The computer callout password was changed.
5. BwZP 1000-4, "Technical Support Center Implementing Procedure"
The title of the referenced procedure in step B.4 was changed to reflect the correct title.
6. BwZP 2000-1A1, "Assistant Station Director Checklist"
The Station tie-line number for pager activation was added for easier use by the Nuclear Duty Officer.
7. BwZP 2000-9A1, "Security Director Checklist"
A statement was added requiring the Security Director to confer with other directors to arrange for transportation in the event of a Station evacuation.
8. BwZP 2000-12, "Radiation Protection Director Implementing Procedure"
The title of the referenced procedure in step B.10 was changed to reflect the correct title.
9. BwZP 3000-2A2, "OSC Team Briefing Form"
The format of the form was changed to conform with a new standard.
10. BwZP 3000-2A3, "OSC Team Debriefing Form"
The format of the form was changed to conform with a new standard.

Attachment 2

Implementing Procedures

ALERT CHECKLIST

NOTE

The checklist is not required to be completed in the order provided. However, the timeframes associated with offsite notifications shall not be exceeded.

A. DECLARATION

1. Declare the Alert condition in accordance with BwZP 200 -1.

EAL # _____

Time of declaration _____

B. NOTIFICATIONS

1. Activate the Emergency Response Organization.
 - a. Off-hours augmentation is accomplished by implementing the call out process in accordance with BwZP 1000-5.
 - 1) Contact Community Alert Network (CAN) at 800-552-4226 or 518-862-0411.
 - 2) Provide your name.
 - 3) Provide your position (Emergency Director).
 - 4) Provide the password (Star).
 - 5) Provide a call back number for the station.
 - 6) Provide CAN with the location from which you are calling (Braidwood Station).
 - 7) Indicate which team list is to be activated.
 - 8) Indicate whether this activation is **Real** or **Test**.
 - 9) Provide current local time.

- B. 1. b. To activate the TSC and OSC using the group page:
- 1) Dial "6" to initiate the paging process.
 - 2) When asked to enter the pager number, enter "9999".
 - 3) When asked to enter the message, enter "9999".
- c. If deemed appropriate, the following message may be passed over the emergency page system:
- ALL DESIGNATED TSC DIRECTORS PLEASE REPORT TO THE TSC
ALL DESIGNATED OSC PERSONNEL PLEASE REPORT TO THE OSC
REPEATING,
ALL DESIGNATED TSC DIRECTORS PLEASE REPORT TO THE TSC
ALL DESIGNATED OSC PERSONNEL PLEASE REPORT TO THE OSC
2. Complete a NARS form in accordance with BwZP 1000-2, "Offsite Notifications". Refer to BwZP 1000-3 for Protective Action Recommendation guidance. The Emergency Director shall approve the NARS form prior to transmission.
 3. Perform the NARS notifications, using Code 20. Notification must begin within 15 minutes of declaration. This will notify Electric Operations (EO), Illinois Department of Nuclear Safety (IDNS), and Illinois Emergency Management Agency (IEMA). If NARS is inoperable, agencies requiring notification can be contacted using a commercial line. The numbers can be found on the NARS form and in the ERF Telephone Directory.
 4. Notify the NRC Resident Inspector (RI) as soon as possible of the impending ENS call. If possible, the RI notification should be made prior to the ENS call; however, the ENS Notification time interval shall not be exceeded.
 5. An NRC Event Notification Worksheet, Reportability Manual, should be utilized to transmit initial information to the NRC via the Emergency Notification System. This notification must take place immediately after notification of state and local authorities, and no longer than 1 hour after time of classification. If a continuous communication is requested and established, a log is used in lieu of ENS Worksheet. The primary and backup phone numbers are listed in the ERF Directory.

If requested by the NRC, assign a person to maintain open communications with the NRC. If an open line is not requested, the NRC must be notified after any major changes.

- B.
6. Activate the Emergency Response Data System (ERDS) within 60 minutes of an Alert Classification in accordance with BwZP 1000-2.
 7. Notify local agencies as needed. Phone numbers for the Braidwood Fire Department, St. Joseph Hospital and Will Co. Sheriff's Office can be found in the ERF Telephone Directory.
 8. State updates are required at the Alert declaration or higher. These updates are required at the top of the second hour following the declaration. The state updates are the responsibility of the EOF. Personnel responsible for making the state updates are as follows:

EOF - Manager of Emergency Operations per CEPIP 2200-01
EOF - Environmental Emergency Coordinator per CEPIP 2221-01

The Station Director/Assistant Station Director should verify that the required state updates are being made by the EOF.

If the EOF cannot complete this task the responsibility reverts back to the TSC.
 9. Verify notification of INPO and ANI of the event. It is the responsibility of the Nuclear Duty Officer to make the notifications within 8 hours of classification.

C. ONGOING ACTIONS

1. Continue to evaluate plant conditions that may lead to a reclassification of the emergency condition.
2. At least once an hour, provide updates to the personnel in your facility. Updates should include but not be limited to the following:
 - a. Facility in command and control
 - b. Current classification and reason for declaration
 - c. Jobs in progress and priority of work
 - d. Significant plant status
 - e. Summary of ongoing activities (i.e. assembly, evacuation)
 - f. Event prognosis
3. The Emergency Director shall remain cognizant of information passed to non-ComEd organizations. This includes updates to IDNS and IEMA, ENS notifications, NARS notifications, and information passed to INPO and ANI.

- C.
 - 4. The Emergency Director shall support requests for information in order to facilitate transfer of Command and Control to the EOF.
 - 5. The Emergency Director should request through the EOF additional materials, mobile equipment, and personnel as appropriate for decontamination, repair, and restoration work.
 - 6. Maintain a log of all Emergency Director GSEP activities.

D. COMMAND AND CONTROL TRANSFER

1. Review the following information with the facility preparing to take Command and Control:

a. Current Classification EAL: _____ Time: _____ Unit: _____
Conditions met to determine this classification: _____

b. Offsite Notifications made:
Latest NARS: Utility Message #: _____ Time: _____
State Message #: _____ Time: _____
Latest ENS Time: _____ Continuous Communications? (Yes/No)

c. Is the relieving facility at minimum staffing and capable of performing the following non-delegable functions?

- 1) Classify events? (Yes/No)
- 2) Determine PAR's and make notifications? (Yes/No)
- 3) Authorize exposures beyond 10CFR20 limits? (Yes/No)
- 4) Authorize the use of Thyroid Blocking Agents (Yes/No)

d. Upon transfer of Command and Control, the following will be performed by (circle one):

- 1) NARS (CR/TSC/EOF)
- 2) ENS (CR/TSC/EOF)
- 3) HPN (CR/TSC/EOF)
- 4) Environs Teams (TSC/EOF)

e. Other pertinent information: Release Occurring (Yes/No)
ERDS Activated (Yes/No) Rad. Concerns (Yes/No)
In-Plant Teams (Yes/No) Offsite Assistance Requested (Yes/No)
Assembly (Yes/No) Evacuation (Yes/No)

- D. 2. Prior to the Command and Control transfer, ensure the following criteria have been met:
- a. Sufficient personnel are available to classify, notify State and local agencies, maintain communications, and determine PARs.
 - b. Personnel in the facility have been fully briefed on the event and proposed plan of action.
 - c. A formal statement of turnover between the Emergency Directors has been made.
" (name) has assumed the position of Emergency Director and now has Command and Control authority as of (time)."

E. DOWNGRADING

1. Downgrading to an Unusual Event may occur when conditions exist such that a lower level of classification would be appropriate. The following should be considered when downgrading:
- a. Have release rates been reduced to a value within the Unusual Event classification?
 - b. Have plant conditions changed so that the lower classification is now appropriate?
 - c. Has consideration been given to modify the station group as necessary to support the new classification?
2. Once downgrading has been established, the Emergency Director shall declare and notify the appropriate agencies using NARS and ENS.

F. RECOVERY/TERMINATION

Refer to BwZP 1000-1A5, "Guidance for Recovery and Termination".

SITE EMERGENCY CHECKLIST

NOTE

The checklist is not required to be completed in the order provided. However, the timeframes associated with offsite notifications shall not be exceeded.

A. DECLARATION

1. Declare the Site Emergency condition in accordance with BwZP 200-1.

EAL # _____

Time of declaration _____

B. NOTIFICATIONS

1. Activate the Emergency Response Organization.
 - a. Off-hours augmentation is accomplished by implementing the call out process in accordance with BwZP 1000-5.
 - 1) Contact Community Alert Network (CAN) at 800-552-4226 or 518-862-0411.
 - 2) Provide your name.
 - 3) Provide your position (Emergency Director).
 - 4) Provide the password (Star).
 - 5) Provide a call back number for the station.
 - 6) Provide CAN with the location from which you are calling (Braidwood Station).
 - 7) Indicate which team list is to be activated.
 - 8) Indicate whether this activation is **Real** or **Test**.
 - 9) Provide current local time.

- B. 1. b. To activate the TSC and OSC using the group page:
- 1) Dial "6" to initiate the paging process.
 - 2) When asked to enter the pager number, enter "9999".
 - 3) When asked to enter the message, enter "9999".
- c. If an assembly has not been performed, contact the Security Shift Supervisor to start the assembly computer program. Have the Control Room sound the assembly siren when the computer program is running. If the Emergency Response Organization has not been activated, this will result in the activation of the TSC and OSC. Announce the following message over the emergency page system:
- ALL PERSONNEL REPORT IMMEDIATELY TO YOUR ASSIGNED ASSEMBLY AREAS.**
(If any, insert precautions here, i.e. alternate routes, inaccessible elevation.)
REPEATING, ALL PERSONNEL REPORT IMMEDIATELY TO YOUR ASSIGNED ASSEMBLY AREAS.
(precautions)
- After an assembly is complete, an evacuation of non-essential personnel is required in accordance with BwZP 2000-11.
2. Complete a NARS form in accordance with BwZP 1000-2, "Offsite Notifications". Refer to BwZP 1000-3 for Protective Action Recommendation guidance. The Emergency Director shall approve the NARS form prior to transmission.
 3. Perform the NARS notifications, using Code 20. Notifications must begin within 15 minutes of declaration. This will notify Electric Operations (EO), Illinois Department of Nuclear Safety (IDNS), and Illinois Emergency Management Agency (IEMA). If NARS is inoperable, agencies requiring notification can be contacted using a commercial line. The numbers can be found on the NARS form and in the ERF Telephone Directory.
 4. Notify the NRC Resident Inspector (RI) as soon as possible of the impending ENS call. If possible, the RI notification should be made prior to the ENS call; however, the ENS Notification time interval shall not be exceeded.

- B. 5. An NRC Event Notification Worksheet, Reportability Manual, should be utilized to transmit initial information to the NRC via the Emergency Notification System. This notification must take place immediately after notification of state and local authorities, and no longer than 1 hour after time of classification. If a continuous communication is requested and established, a log is used in lieu of ENS Worksheet. The primary and backup phone numbers are listed in the ERF Telephone Directory.

If requested by the NRC, assign a person to maintain open communications with the NRC. If an open line is not requested, the NRC must be notified after any major changes.

6. Verify/activate the Emergency Response Data System (ERDS) within 60 minutes of an Alert or higher classification in accordance with BwZP 1000-2.
7. Contact the OSC to verify communications and to verify the dispatch of environmental monitoring teams.
8. Notify local agencies as needed. Phone numbers for the Braidwood Fire Dept., St. Joseph Hospital and Will County Sheriff's Office in the ERF Telephone Directory.
9. State updates are required at the Alert declaration or higher. These updates are required at the top of the second hour following the declaration. The state updates are the responsibility of the EOF. Personnel responsible for making the state updates are as follows:

EOF - Manager of Emergency Operations per CEPIP 2200-01
EOF - Environmental Emergency Coordinator per CEPIP 2221-01

The Station Director/Assistant Station Director should verify that the required state updates are being made by the EOF.

If the EOF cannot complete this task the responsibility reverts back to the TSC.

C. ONGOING ACTIONS

1. Continue to evaluate plant conditions that may lead to a reclassification of the emergency condition.
2. At least once an hour, provide updates to the personnel in your facility. Updates should include but not be limited to the following:
 - a. Facility in Command and Control
 - b. Current classification and reason for declaration
 - c. Jobs in progress and priority of work
 - d. Significant plant status
 - e. Summary of ongoing activities (i.e. assembly, evacuation)
 - f. Event prognosis
3. The Emergency Director shall remain cognizant of information passed to non-ComEd organizations. This includes updates to IDNS and IEMA, ENS notifications, NARS notifications, and information passed to INPO and ANI.
4. The Emergency Director shall support requests for information in order to facilitate transfer of Command and Control to the EOF.
5. The Emergency Director should request through the EOF additional materials, mobile equipment, and personnel as appropriate for decontamination, repair, and restoration work.
6. Maintain a log of all Emergency Director or GSEP activities.

D. COMMAND AND CONTROL TRANSFER

1. Review the following information with the facility preparing to take Command and Control:

a. Current Classification EAL: _____ Time: _____ Unit: _____
Conditions met to determine this classification: _____

b. Offsite Notifications made:
Latest NARS: Utility Message #: _____ Time: _____
State Message #: _____ Time: _____
Latest ENS Time: _____ Continuous Communications? (Yes/No)

c. Is the relieving facility at minimum staffing and capable of performing the following non-delegable functions?

- 1) Classify events? (Yes/No)
- 2) Determine PARs and make notifications? (Yes/No)
- 3) Authorize exposures beyond 10CFR20 limits? (Yes/No)
- 4) Authorize the use of Thyroid Blocking Agents (Yes/No)

d. Upon transfer of Command and Control, the following will be performed by (circle one):

- 1) NARS (CR/TSC/EOF)
- 2) ENS (CR/TSC/EOF)
- 3) HPN (CR/TSC/EOF)
- 4) Environs Teams (TSC/EOF)

e. Other pertinent information: Release Occurring (Yes/No)
ERDS Activated (Yes/No) Rad. Concerns (Yes/No)
In-Plant Teams (Yes/No) Offsite Assistance Requested (Yes/No)
Assembly (Yes/No) Evacuation (Yes/No)

- D. 2. Prior to the command and control transfer, ensure the following criteria have been met:
- a. Sufficient personnel are available to classify, notify State and local agencies, maintain communications, and determine PARs.
 - b. Personnel in the facility have been fully briefed on the event and proposed plan of action.
 - c. A formal statement of turnover between the Emergency Directors has been made.
" (name) has assumed the position of Emergency Director and now has Command and Control authority as of (time) ."

E. RECOVERY/TERMINATION

Refer to BwZP 1000-1A5, "Guidance for Recovery and Termination".

GENERAL EMERGENCY CHECKLIST

NOTE

The checklist is not required to be completed in the order provided. However, the timeframes associated with offsite notifications shall not be exceeded.

A. DECLARATION

1. Declare the General Emergency condition in accordance with BwZP 200-1.

EAL# _____

Time of declaration _____

B. NOTIFICATIONS

1. Activate the Emergency Response Organization.
 - a. Off-hours augmentation is accomplished by implementing the call out process in accordance with BwZP 1000-5.
 - 1) Contact Community Alert Network (CAN) at 800-552-4226 or 518-862-0411.
 - 2) Provide your name.
 - 3) Provide your position (Emergency Director).
 - 4) Provide the password (Star).
 - 5) Provide a call back number for the station.
 - 6) Provide CAN with the location from which you are calling (Braidwood Station).
 - 7) Indicate which team list is to be activated.
 - 8) Indicate whether this activation is **Real** or **Test**.
 - 9) Provide current local time.

- B. 1. b. To activate the TSC and OSC using the group page:
- 1) Dial "6" to initiate the paging process.
 - 2) When asked to enter the pager number, enter "9999".
 - 3) When asked to enter the message, enter "9999".
- c. If an assembly has not been performed, contact the Security Shift Supervisor to start the assembly computer program. Have the Control Room sound the assembly siren when the computer program is running. If the Emergency Response Organization has not been activated, this will result in the activation of the TSC and OSC. Announce the following message over the emergency page system:
- ALL PERSONNEL REPORT IMMEDIATELY TO YOUR ASSIGNED ASSEMBLY AREAS.**
(If any, insert precautions here, i.e. alternate routes, inaccessible elevation)
REPEATING, ALL PERSONNEL REPORT IMMEDIATELY TO YOUR ASSIGNED ASSEMBLY AREAS.(precautions)
- After an Assembly is complete, evacuation of non-essential personnel is required in accordance with BwZP 2000-11.
2. Complete a NARS form in accordance with BwZP 1000-2, "Offsite Notifications". Refer to BwZP 1000-3 for Protective Action Recommendation guidance. The Emergency Director shall approve the NARS form prior to transmission.

- B. 3. Perform the NARS notifications, notifications must begin within 15 minutes of declaration. If NARS is inoperable agencies requiring notification can be contacted using a commercial line. The numbers can be found on the NARS form and in the ERF Telephone Directory.

If the General Emergency condition is an upgrade from a previous condition, use Code 20 to make the notification. This will notify Electric Operations (EO), Illinois Emergency Management Agency (IEMA) and Illinois Department of Nuclear Safety (IDNS).

If the General Emergency condition is the initiating condition of the event, use Code 38 to make the notification. This code will notify EO, IEMA, IDNS, Will County OEM, Will County Sheriff, Grundy County Sheriff, Grundy County ESDA, Kankakee County Sheriff and Kankakee County EOC. Depending upon the time of day, Grundy County ESDA, Kankakee County EOC and Will County OEM may or may not respond. These locations do not require 15 minute notification.

4. Notify the NRC Resident Inspector (RI) as soon as possible of the impending ENS call. If possible, the RI notification should be made prior to the ENS call; however, the ENS Notification time interval shall not be exceeded.

- B. 5. An NRC Event Notification Worksheet, Reportability Manual, should be utilized to transmit initial information to the NRC via the Emergency Notification System. This notification must take place immediately after notification of state and local authorities, and no longer than 1 hour after time of classification. If a continuous communication is requested and established, a log is used in lieu of ENS Worksheet. The primary and backup phone numbers are listed in the ERF Directory.

If requested by the NRC, assign a person to maintain open communications with the NRC. If an open line is not requested, the NRC must be notified after any major changes.

6. Verify/activate the Emergency Response Data System (ERDS) within 60 minutes of an Alert or higher classification in accordance with BwZP 1000-2.
7. Contact the OSC to verify communications and to verify the dispatch of environmental monitoring teams.
8. Notify local agencies as needed. Phone numbers for the Braidwood Fire Dept., St. Joseph Hospital, and Will County Sheriff's Office can be found in the ERF Telephone Directory.
9. State updates are required at the Alert declaration or higher. These updates are required at the top of the second hour following the declaration. The state updates are the responsibility of the EOF. Personnel responsible for making the state updates are as follows:

EOF - Manager of Emergency Operations per CEPIP 2200-01
EOF - Environmental Emergency Coordinator per CEPIP 2221-01

The Station/Assistant Station Director should verify that the required state updates are being made by the EOF.

If the EOF cannot complete this task the responsibility reverts back to the TSC.

10. Verify notification of INPO and ANI of the event. It is the responsibility of the Nuclear Duty Officer to make the notifications within 8 hours of classification.

C. ONGOING ACTIONS

1. Continue to evaluate plant conditions that may lead to a reclassification of the emergency condition.
2. At least once an hour, provide updates to the personnel in your facility. Updates should include but not be limited to the following:
 - a. Facility in Command and Control
 - b. Current classification and reason for declaration
 - c. Jobs in progress and priority of work
 - d. Significant plant status
 - e. Summary of ongoing activities (i.e. assembly, evacuation)
 - f. Event prognosis
3. The Emergency Director shall remain cognizant of information passed to non-ComEd organizations. This includes updates to IDNS and IEMA, ENS notifications, NARS notifications, and information passed to INPO and ANI.
4. The Emergency Director shall support requests for information in order to facilitate transfer of Command and Control to the EOF.
5. The Emergency Director should request through the EOF additional materials, mobile equipment, and personnel as appropriate for decontamination, repair, and restoration work.
6. Maintain a log of all Emergency Director GSEP activities.

D. COMMAND AND CONTROL TRANSFER

1. Review the following information with the facility preparing to take Command and Control:

a. Current Classification EAL: _____ Time: _____ Unit: _____
Conditions met to determine this classification: _____

b. Offsite Notifications made:
Latest NARS: Utility Message #: _____ Time: _____
State Message #: _____ Time: _____
Latest ENS Time: _____ Continuous Communications? (Yes/No)

c. Is the relieving facility at minimum staffing and capable of performing the following non-delegable functions?

- 1) Classify events? (Yes/No)
- 2) Determine PAR's and make notifications? (Yes/No)
- 3) Authorize exposures beyond 10CFR20 limits? (Yes/No)
- 4) Authorize the use of Thyroid Blocking Agents (Yes/No)

d. Upon transfer of Command and Control, the following will be performed by (circle one):

- 1) NARS (CR/TSC/EOF)
- 2) ENS (CR/TSC/EOF)
- 3) HPN (CR/TSC/EOF)
- 4) Environs Teams (TSC/EOF)

e. Other pertinent information: Release Occurring (Yes/No)
ERDS Activated (Yes/No) Rad. Concerns (Yes/No)
In-Plant Teams (Yes/No) Offsite Assistance Requested (Yes/No)
Assembly (Yes/No) Evacuation (Yes/No)

- D. 2. Prior to the command and control transfer, ensure the following criteria have been met:
- a. Sufficient personnel are available to classify, notify State and local agencies, maintain communications, and determining PARs.
 - b. Personnel in facility have been fully briefed on the event and proposed plan of action.
 - c. A formal statement of turnover between the Emergency Directors has been made.
"_(name)_ has assumed the position of Emergency Director and now has Command and Control authority as of _ (time)_."

E. RECOVERY/TERMINATION

Refer to BwZP 1000-1A5, "Guidance for Recovery and Termination".

OFF HOURS AUGMENTATION

A. PURPOSE

This procedure outlines the steps necessary for staff augmentation under emergency conditions outside of normal working hours.

B. REFERENCES

1. Generating Stations Emergency Plan (GSEP).
2. Braidwood Commitment #20-82-018.
3. BwZP 1000-1, "Emergency Director Implementing Procedure".

C. PREREQUISITES

None.

D. PRECAUTIONS

1. If the computer call out system should fail, staff augmentation will be completed using the Station Augment Call Tree in BwZP 1000-5A1.
2. A copy of the Station Augmentation List is maintained in the Shift Manager's Office.

E. LIMITATIONS AND ACTIONS

Names and phone numbers of emergency response personnel retained in the augmentation call list shall be updated quarterly in accordance with the GSEP.

F. PROCEDURE

1. The Acting Station Director or designee will activate the GSEP Station Group as follows:
 - a. Unusual Event - Notification as deemed appropriate.
 - b. Alert, Site Emergency, or General Emergency - Initiate the off hours augmentation call process to activate the Station GSEP Group.

- F. 2. The Acting Station Director or designee will activate the GSEP Station Group utilizing the computer call out system and station pager group page in accordance with BwZP 1000-1 as appropriate.
- a. Contact Community Alert Network (CAN) at 800-552-4226 or 518-862-0411.
 - b. Provide your name.
 - c. Provide your position (Emergency Director).
 - d. Provide the password (Star).
 - e. Provide a call back number for the station.
 - f. Provide CAN with the location from which you are calling (Braidwood Station).
 - g. Indicate which team list is to be activated.
 - h. Indicate whether this activation is **Real** or **Test**.
 - i. Provide current local time.
3. CAN will begin contacting personnel to fill all appropriate ERO positions. CAN will fax a report to the station indicating the names of personnel contacted to respond to the drill or actual event.
4. Station GSEP Directors shall fill additional personnel requirements by use of a station employee list or other appropriate listing. It is the directors' responsibility to call bargaining unit personnel as necessary. Bargaining unit personnel are not included in the staff augmentation call out process.
5. If additional personnel are required beyond those available from the station employee list, the Emergency Director may request personnel from other ComEd nuclear stations, divisions, general office or contractors through the offsite Emergency Operations Facility.

G. APPENDICES

BwZP 1000-5A1, "Staff Augmentation Call Tree."

TECHNICAL SUPPORT CENTER IMPLEMENTING PROCEDURE

A. PURPOSE

This procedure describes the activation of the Technical Support Center (TSC) and outlines the responsibilities of the station group.

B. REFERENCES

1. Generating Station Emergency Plan (GSEP).
2. NUREG-0696 "Functional Criteria for Emergency Response Facilities"
3. BwZP 1000-5, "Off Hours Augmentation"
4. CEPIP 4010-01 "Offsite Emergency Response Facility (ERF) Functional Criteria"

C. PREREQUISITES

None

D. PRECAUTIONS

Prior to the TSC being activated, essential GSEP functions must be performed in the Control Room. A formal turnover statement must be made between the Emergency Directors when the TSC is ready to assume command and control.

E. LIMITATIONS AND ACTIONS

1. The activation of the TSC is required when:
 - a. directed by the Emergency Director
 - b. an Alert is declared
 - c. a Site Emergency is declared
 - d. a General Emergency is declared
2. The TSC shall be evacuated if radiological conditions result in the TSC becoming a High Radiation Area, or airborne concentrations are such that respiratory protection is required.
3. Upon evacuation of the TSC, personnel should report to the following locations: The Station, Operations and Technical Directors, along with the ENS and NARS Communicators, will relocate to the Control Room; all other TSC personnel will relocate to the OSC.

F. PROCEDURE

1. The TSC is located on the north end of the Turbine Building with the entrance at the 451' elevation.
2. Activation of the TSC is completed through use of the plant public address system, telephones, and/or pagers. Guidance for station staffing is found in BwZP 1000-4A1.

To activate the TSC and OSC using the group page:

- a. Dial "6" to initiate the paging process.
 - b. When asked to enter the pager number, enter "9999".
 - c. when asked to enter the message, enter "9999".
3. If the TSC is activated during off shifts, individuals or their alternates are notified to report to the TSC IAW BwZP 1000-5.
 4. The functions of the TSC Staff include assisting the Control Room on assessment of plant condition and mitigation of the emergency, coordinating emergency response activities at the site, and assessing offsite dose potentials (until this responsibility can be assumed by the EOF).
 5. The transfer of Command and Control of the emergency from the Control Room to the TSC may not be made until the following criteria are met:
 - a. Sufficient personnel are available in the facility to determine classifications, to determine recommended protective actions, to notify federal, state and local agencies and to maintain communications.
 - b. Personnel in the facility have been fully briefed as to plant status and proposed plan of action.
 - c. A formal statement of turnover between the Control Room and TSC has been made.
 6. The minimum staff for the TSC is composed of the following qualified people:
 - a. Station Director
 - b. Operations Director
 - c. Technical Director
 - d. Radiation Protection or Environs Director
 - e. Maintenance Director

- F. 7. For the TSC to be determined functional, the capability for providing the following functions must exist:
- a. Classification of emergencies,
 - b. Providing Protective Action Recommendations (PARs),
 - c. Notifications to offsite authorities,
 - d. Effluent and environs monitoring, assessment and dose projections, and
 - e. Management of plant operations.

To **classify** emergency conditions, access to plant data and conditions must be available. This can be accomplished by either computer data or phone links to the Control Room. **Notifications** require some sort of phone lines/radios availability. Effluent and environmental monitoring require the ability to do dose projections, assessments, etc. Therefore, the computers for data and B/C-Models would be necessary. **PARs** are generated from the above outputs or by flowchart providing minimums. Habitability (radiological, power, lighting and life support) is also needed to exist in order to safely staff the TSC and assume these functions. When all of the above are available, then the TSC is functional.

If any one of power, lighting, phones or computers is not available, but the functions can be performed by alternate means, the TSC is degraded. A degraded TSC would best be reported on a courtesy basis to the NRC Resident Inspector's office and the NRC RIII EP Inspector assigned to the Station. Degraded is a judgment call by station management.

If the TSC cannot take Command and Control from the Control Room, the TSC shall be declared inoperable. Backups to all the TSC functions can be in place very quickly using the Control Room, EOF or other stations to provide information, calculation and communication capabilities. The inoperability of the TSC should be considered for its assessment capability and applicability for reporting under 50.72(b).

Loss of assessment capability is reportable under 50.72(b) [non-emergency] (1) [1 hour](v) [loss of emergency assessment capability] if, in the judgment of station management using the guidance of the Reportability Manual, a major loss of assessment capability is determined.

G. APPENDICES

BwZP 1000-4A1, "Guidance for Augmentation of the Onsite Emergency Organization."

ASSISTANT STATION DIRECTOR CHECKLIST

This checklist is provided solely for the convenience of the Assistant Station Director. It is not necessary to follow the checklist step-by-step. Its completion is not required and its use is determined by the Assistant Station Director.

1. ACTIVATE the Emergency Offsite Facility (EOF) pagers.
 - a. Dial (630) 603-7007
 - b. After 3 beeps, enter "29311111#"
 - c. Wait for a series of beeps or a recorded voice to acknowledge the page.
2. ENSURE all clocks in the TSC and OSC are synchronized to the Control Room time.
3. VERIFY the following positions are filled:
 - a. One State/NARS Communicator, assign to the Assistant Station Director.
 - b. One ENS Communicator, assign to the Technical Director.
 - c. One Command and Control Communicator for the Control Room, assign to the Shift Manager.
 - d. One Datalink Communicator for the Control Room, assign to the Shift Manager.
 - e. One Command and Control Communicator for the TSC.
 - f. One Datalink Communicator for the TSC.
 - g. One Command and Control Communicator for the OSC, assign to the OSC Director.
 - h. One Datalink Communicator for the OSC, assign to the OSC Director.
 - i. One HPN Communicator, assign to the Environs Director.
 - j. One Technical Communicator, assign to the Technical Director.
 - k. Two status board recorders for the TSC.
 - l. One Status board recorder for the OSC.
4. With Command and Control transferred to the TSC, ENSURE all notifications have been made to appropriate agencies.

5. As necessary, DIRECT the activities of the ENS Communicator.
 - a. ENSURE approved information is provided to the NRC using the ENS Worksheet.
 - b. ENSURE follow-up notifications are provided to the NRC in accordance with BwZP 2000-19.
 - c. ENSURE the Emergency Response Data System (ERDS) program for the NRC has been activated by the Control Room. If it has not been started, activate in accordance with BwZP 1000-2.
6. ASSIST in preparation of the NARS form in accordance with BwZP 1000-2.
7. VERIFY that the EOF will be completing State agency updates.
8. SUPERVISE all NARS calls from the TSC.
9. ENSURE communicators perform the following:
 - a. TRANSMIT information that has been approved by the Emergency Director.
 - b. Transmittals contain both date and time.
 - c. Inquiries and their responses are documented.
10. ENSURE records of all transmittals are maintained:
 - a. NARS forms.
 - b. Plant Status forms.
 - c. ENS Worksheets.
 - d. GSEP Message Forms.
 - e. Others, as appropriate.
11. REVIEW TSC status boards to ensure current and adequate information is depicted.

12. The Assistant Station Director shall assign the following liaison responsibilities upon the NRC arrival in the TSC.
 - a. Security Director to the NRC Safeguards representative.
 - b. Technical and/or Operations Director to the NRC Reactor Safety representative.
 - c. Radiation Protection Director to the NRC Health Physics representative.
13. MAINTAIN a log of all Assistant Station Director GSEP activities.

SECURITY DIRECTOR CHECKLIST

This checklist is provided solely for the convenience of the Security Director. It is not necessary to follow the checklist step-by-step. Its completion is not required and its use is determined by the Security Director.

- Identify any non-routine security procedures and/or contingencies that are in effect or require a response.
- Acquire TSC security staff equipped with a security radio to assist in the event.
- Make sure the security printer in the TSC is operational.
- Account for all personnel in the protected area.
- Control access to roads entering the plant property.
- If site evacuation is recommended, post the appropriate exit for traffic control.
- Assist the Administrative Director with controlling access to the TSC.
- Notify the Corporate Nuclear Security Administrator to initiate security at the JPIC.
- Coordinate with the Radiation Protection Director and control ingress to and egress from the protected area.
- Coordinate with the Radiation Protection Director to establish air sampling of the assembly areas.
- Coordinate with the Radiation Protection Director to keep security personnel informed of areas affected by gaseous releases. Consider developing a means to avoid or ways to monitor entrance of security personnel into a possible plume path.
- Provide an escort and expedite ingress, as necessary, for the NRC Site Team. Coordinate with the Radiation Protection Director for appropriate team monitoring.
- As appropriate, provide necessary information to the NRC Safeguards representative.
- Maintain a log of all Security Director GSEP activities.
- Coordinate with RP and Admin if transportation will be needed for station evacuation.

RADIATION PROTECTION DIRECTOR
IMPLEMENTING PROCEDURE

A. PURPOSE

This procedure outlines the methods used to implement the duties of Radiation Protection Director under emergency conditions.

B. REFERENCES

1. Generating Station Emergency Plan (GSEP).
2. Corporate Emergency Plan Implementing Procedures.
3. BwAP 1100-16, "Fire/Hazardous Materials Spill and/or Injury Response".
4. BwZP 1000-3, "GSEP Protective Action Guidelines".
5. BwZP 200-3, "Station Release Rate Determination".
6. BwZP 2000-14, "Environs Director Implementing Procedure".
7. BwZP 2000-17, "Chemistry Director Implementing Procedure".
8. BwZP 2000-11, "Evacuation of Personnel".
9. BwZP 3000-1, "Operational Support Center Implementing Procedure".
10. CEPIP 3005-1, "Airborne Radioiodine Concentrations to Determine Thyroid Blocking Agent Use".

C. PREREQUISITES

None.

D. PRECAUTIONS

1. Personnel performing radiation surveys and chemistry analyses require appropriate dosimetry such as finger rings, TLDs and secondary dosimeters to ascertain the accumulated radiation exposure.
2. Evaluate restrictions on eating, drinking and smoking in assembly areas when there is a radiological release.

E. LIMITATIONS AND ACTIONS

1. Initiation of environmental sampling activities and direction of the Environs Group will be performed by the Radiation Protection Director until the Environs Director assumes these responsibilities.
2. If radiation levels at the site boundary are significantly elevated, initial emphasis will be placed upon determination of offsite radiation levels and identification of areas requiring controlled access and/or evacuation.
3. The Radiation Protection Director reports to the Technical Support Center (TSC) unless otherwise directed by the Emergency Director.
4. The use of RWPs is waived in emergency situations. Inplant activities are documented by completion of the OSC Task Assignment form found in BwZP 3000-2. In the Recovery Phase of the event, the Radiation Protection Director may reestablish the use of RWPs.

F. PROCEDURE

1. Provide monitoring services with respect to the emergency as required. Refer to the BwRP series of procedures for appropriate survey and monitoring techniques under emergency conditions.
2. Assist the Operations Director in planning personnel rescue operations, including the transfer of injured and/or contaminated personnel. Refer to BwAP 1100-16.
3. Coordinate with the Security Director to establish air sampling in the assembly areas as necessary prior to personnel arrival. Ensure the assembly areas are monitored when personnel begin to assemble.
4. Coordinate with the Security Director in the determination of which personnel evacuation route will be used. Refer to BwZP 2000-11A1 for evacuation routes.
5. Ensure that personnel are decontaminated, if necessary.
6. Ensure appropriate bioassay procedures have been implemented for onsite personnel.
7. Assist in the evaluation of Protective Action Recommendations (PARs) and changes in Emergency Action Levels (EALs).

- F.
8. Advise the Emergency Director of situation where the use of potassium iodide (KI) should be considered.
 9. Accumulate, tabulate, and evaluate data on plant conditions such as meteorological and radiological monitor readings.
 10. Authorize emergency response personnel exposures below 10CFR20 limits. Assist the Station Director in determining if exposures beyond the 10CFR20 limits are necessary.
 11. Ensure the use of protective clothing, respiratory protection and access control within the plant to control personnel exposures.
 12. Evaluate the need for additional staffing and equipment. Provide a list of essential personnel in the event of an assembly and plant evacuation.
 13. Coordinate initial offsite monitoring efforts until such time as the environs group can be directed by a designated Environs Director. Refer to the Environs Group Emergency Plan Implementing Procedures as applicable.
 14. As necessary supervise the activities of the Chemistry Director, Environs Director, and Health Physics Network (HPN) communicator. Ensure only approved Health Physics information is provided via HPN.
 15. Act as the TSC liaison with the NRC Health Physics Representative.
 16. Maintain a log of all Radiation Protection Director GSEP activities.
 17. Refer to the Radiation Protection Director Checklist provided in BwZP 2000-12A1.

G. APPENDICES

BwZP 2000-12A1, "Radiation Protection Director Checklist".

(Final)

