

NRCS

BNP SELECT DOCUMENT TRANSMITTAL

TO: RECIPIENT ID 083 NRC DOCUMENT ROOM  
MAIL LOCATION: O/S WASHINGTON, DC

DATE: 04/06/00

FROM: BNP NUC DOC CNTRL-Z 1

TRANSMITTAL: 000406073053

QTY	MED	DOC KIND	DOCUMENT	AC/TC/ FORM-T/O	REV	EFFECTIVE	STATUS
01	T	POM	OPEP -04.08		004	04/06/00	APPROVED
01	T	POM	OPEP -04.3		015	04/06/00	APPROVED

COMMENTS:

A045



PLANT OPERATING MANUAL

VOLUME XIII

PLANT EMERGENCY PROCEDURE

RECEIVED BY BNP  
APR 06 2000

UNIT  
0

SELECT  
DISTRIBUTION

NUCLEAR DOCUMENT CONTROL



**OPEP-04.3**

**PERFORMANCE OF TRAINING, EXERCISES, AND  
DRILLS**

REVISION 15

EFFECTIVE DATE  
04/06/00

Sponsor	<u>Teresa G. Thompson</u>	<u>04/04/00</u> Date
Approval	<u>Mike Alford</u> Supervisor - Emergency Preparedness	<u>04/05/00</u> Date

## REVISION SUMMARY

Revision 15 of OPEP-04.3 consists of the following:

- Corrected typographical errors in Sections 2.2, 2.5, and 5.1.3.
- Added new Section 2.7 reference to reflect NUREG-0654, Section N.2.C medical drill requirements.
- Changed "BSP-50 Command and Control/Communication Protocol" to "OAP-050 Site Command, Control, and Communications Procedure" to reflect procedure title change in Section 6.1.6.1b.
- Re-worded Section 6.3.4 to clarify EP Supervisor responsibilities for coordinating/conducting drills.
- Revised Section 6.3.3.4 to clarify extent of participation and periodicity requirements for medical drills.
- Added new Section 6.3.3.8 to describe Severe Accident Management Guideline (SAMG) drills as a procedural enhancement.

### LIST OF EFFECTIVE PAGES

<u>Pages</u>	<u>Revision</u>
1-13	15

## TABLE OF CONTENTS

SECTION	PAGE
1.0 PURPOSE.....	4
2.0 REFERENCES.....	4
3.0 GENERAL.....	4
4.0 DEFINITIONS/ABBREVIATIONS.....	4
5.0 RESPONSIBILITIES.....	5
6.0 INSTRUCTIONS.....	6
6.1 Training Requirements for On-Site Emergency Response Organization Personnel.....	6
6.2 Training Requirements for Off-Site Support Personnel.....	8
6.3 Drills.....	9
6.4 Exercises.....	12
6.5 Planning of Exercises.....	13

## **1.0 PURPOSE**

The purpose of this procedure is to establish requirements for emergency plan training/refresher training, drills, and exercises for Brunswick Nuclear Plant (BNP) Emergency Response Organization (ERO) personnel and local off-site support agencies.

## **2.0 REFERENCES**

- 2.1 Radiological Emergency Response Plan, Section 6.0
- 2.2 0RCI-11.0, Emergency Response Organization - Additions, Deletions, & Changes
- 2.3 0PEP-04.2, Emergency Facilities and Equipment
- 2.4 0TPP-216, Emergency Preparedness Training Program
- 2.5 TAP-6.16, Emergency Response Organization Qualification Checklists
- 2.6 POM Volume XIX, Fire Protection Procedures
- 2.7 NUREG-0654, Section N.2.C

## **3.0 GENERAL**

- 3.1 Personnel from the BNP Emergency Preparedness staff shall be considered qualified instructors based on continued involvement and awareness of emergency planning regulations and the BNP Radiological Emergency Response Plan and Procedure development.

## **4.0 DEFINITIONS/ABBREVIATIONS**

- 4.1 Annually - At least once per 366 days
- 4.2 Drill - Supervised instruction period aimed at testing, developing, and maintaining skills in a particular operation; a drill may also be conducted to train ERO personnel in their emergency response functions.
- 4.3 Exercise - An event that tests the integrated capability of major response organizations; objectives are varied exercise to exercise to test all aspects of the Emergency Response Plan over a six (6) year cycle.

## 4.0 DEFINITIONS/ABBREVIATIONS

- 4.4 Monthly - At least once per 31 days.
- 4.5 Once per calendar year - Once anytime between January 1 and December 31.
- 4.6 Quarterly - At least once per 92 days.
- 4.7 Semiannually - At least once per 184 days.
- 4.8 ERO - Emergency Response Organization

## 5.0 RESPONSIBILITIES

### 5.1 Supervisor - Emergency Preparedness

The Supervisor - Emergency Preparedness (EP) Brunswick Nuclear Plant is designated the Emergency Planning Coordinator and is responsible:

- 5.1.1 To the Plant General Manager for ensuring emergency response training is given to local off-site support personnel who may be required to assist in an emergency at the site.
- 5.1.2 For the planning, scheduling and administrating of drills and exercises as described in this procedure.
- 5.1.3 For review of the ERO training records each month to verify current qualifications of ERO staff. Changes are made using ORCI-11.0, Emergency Response Organization - Additions, Deletions, & Changes.

### 5.2 Supervisor - Brunswick Technical Training

The Supervisor - Brunswick Technical Training (BTT) is responsible for ensuring Emergency Response Training is given to on-site Emergency Response Organization personnel who may be required to assist in an emergency.

### 5.3 ERO Members

Individuals assigned to the ERO are responsible for familiarity with the Plant Emergency Procedures (PEPs) and maintaining proficiency in executing PEPs that are applicable to their ERO assignment.

## 5.0 RESPONSIBILITIES

### 5.4 Superintendent - Operations Support

The Superintendent - Operations Support is responsible for first aid and fire brigade training as defined in the Fire Protection Program.

## 6.0 INSTRUCTIONS

### 6.1 Training Requirements for On-Site Emergency Response Organization Personnel

**NOTE:** Training, unless specifically stated otherwise, will be given as described by this procedure and OTPP-216, Emergency Preparedness Training Program; however, lack of emergency plan training should not prevent an otherwise qualified individual from performing designated functions, as long as the individual works with or under the direction of a trained team member.

#### 6.1.1 Badged Personnel

All badged personnel on-site, other than escorted personnel, shall receive initial orientation and annual refresher training from the Supervisor - BTT or his designee in the following:

1. Basic principles of radiological safety, including effects of radiation, theory and use of radiation detection devices, use of protective clothing, equipment and devices.
2. Evacuation and accountability responsibilities.

#### 6.1.2 Security Team Members

Plant personnel who are designated as Security Team members shall receive initial and subsequent annual refresher training from the Supervisor - BTT or his designee, in the following:

1. Personnel accountability, evacuation, and perimeter control procedures
2. Site access
3. Deployment of Security personnel
4. Applicable communication links

## **6.1 Training Requirements for On-Site Emergency Response Organization Personnel**

### **6.1.3 Licensed Operators**

Plant Licensed Operators shall receive initial and subsequent annual refresher training from the Supervisor - BTT or his designee, in the following:

1. Emergency classifications and emergency action levels
2. Initial dose projections
3. Assistance provided by the Technical Support Center
4. Notifications to off-site agencies

### **6.1.4 Technical Support Center Members**

Personnel who are designated as Site Emergency Coordinator, TSC Directors, OSC/TSC management shall receive initial and subsequent annual refresher training from the Supervisor - BTT or his designee; in the following:

1. Emergency classifications and Emergency Action Levels
2. Emergency Response Organization
3. On-Site Support Facilities
4. Protective Action Guides and Exposure Control
5. CP&L - NRC Interface
6. Off-Site Agencies

In addition to the above topics, each individual in the emergency response organization is responsible to maintain a proficiency in the procedures which apply to their positions.

### **6.1.5 Emergency Operations Facility Member**

Personnel who will staff the Emergency Operations Facility shall receive initial and subsequent annual refresher training from the Supervisor - BTT or his designee. This training will include topics similar to those listed above for the TSC but tailored for the EOF.

**6.1 Training Requirements for On-Site Emergency Response Organization Personnel**

**6.1.6 Joint Information Center (JIC) Member**

1. Personnel who will staff the JIC shall receive initial and subsequent annual refresher training from the Supervisor - BTT or his designee. This training will include:
  - a. EP Organization
  - b. OAP-050 Site Command, Control, and Communications Procedure
  - c. Logkeeping Documentation
  - d. Drillsmanship
  - e. Turnover to Successor
  - f. JIC Facility Specific
2. JIC personnel (as appropriate for the assigned position) shall also receive hands-on training in the areas of news release writing, or speaking to the media and general public via press conferences or telephone response.

**6.1.7 Fire Brigade**

1. Fire Brigade members will receive initial and periodic retraining in first aid.
2. Plant personnel who are designated as fire brigade members shall receive initial and subsequent annual retraining identified in the Fire Protection Program.

**6.2 Training Requirements for Off-Site Support Personnel**

- 6.2.1 The Supervisor - Emergency Preparedness will provide retraining to the following off-site support agencies once per calendar year:
1. Hospital - Doshier
  2. Rescue Squad - Southport, Brunswick County EMS, Sunny Point

## 6.2 Training Requirements for Off-Site Support Personnel

3. Fire - Southport, Yaupon Beach, Long Beach, Boiling Spring Lakes, Sunny Point Fire Department

Training of the above includes the following areas:

- Notification procedures
- Basic radiation protection
- Expected roles of each support group
- Site access procedures and identification of on-site contacts

6.2.2 The Supervisor - Emergency Preparedness will ensure training is provided to state and county public information officers and local news media in the areas of radiation, nuclear operations, and official points of contact for plant information once per calendar year.

6.2.3 The Supervisor - Emergency Preparedness will provide training and review the method and interpretation of Emergency Action Levels and Protective Action Recommendations with State and County authorities once per calendar year.

## 6.3 Drills

6.3.1 The Supervisor - EP will initiate conduct of periodic drills. The goal of this program is to conduct drills during each quarter of the year. Any erroneous actions by the participants will be corrected on the spot and, if necessary, individual or group instructions can be given as needed.

6.3.2 When drills, exercises, or other activities are planned which involve participation by off-site support agencies or county emergency agencies, notification shall be provided to the Supervisor - Emergency Preparedness or his designee. The notification of such activities (i.e., fire protection, security) should be provided at least three weeks prior to the scheduled date of the activity by the manager planning the activity. The Supervisor - Emergency Preparedness, or his designee, is responsible for notifying the Brunswick and New Hanover County Emergency Management Directors when their respective counties are involved.

## 6.3 Drills

6.3.3 Emergency drills are supervised instruction periods aimed at testing, developing and maintaining skills, and to ensure that adequate emergency response capabilities are maintained during the interval between evaluated exercises. Periodic drills will be conducted in addition to the evaluated exercise as follows:

1. General: At least one drill shall be conducted during the interval between evaluated exercises involving a combination of some of the principal functional areas of the organization's onsite emergency response capabilities. The principal functional areas of emergency response include activities such as management and coordination of emergency response, accident assessment, protective action decision making, and plant system repair and corrective actions. During these drills, activation of all of the emergency response facilities (Technical Support Center (TSC), Operations Support Center (OSC), and the Emergency Operations Facility (EOF)) is not necessary. Participants have the opportunity to consider accident management strategies, supervised instruction is permitted, and participants have the opportunity to resolve problems (success paths) rather than have controllers intervene. The drills focus on onsite training objectives.
2. Communication Drills: This activity is described in OPEP-04.2, Emergency Facilities and Equipment.
3. Fire Drills: Fire drills will be held in accordance with the Fire Protection Program.
4. Medical Emergency Drills: Medical emergency drills involving a simulated contaminated individual with provision for participation by the local support services agencies (ambulance and offsite medical treatment facility) shall be conducted annually. The actual offsite portions of the drills (also called MS-1 drills) may be conducted once per calendar year and may be performed as part of the required biennial exercise.

The State is responsible for scheduling the MS-1 drills with FEMA, and the counties are responsible for conducting the drills. MS-1 drills need to be evaluated by FEMA only biennially. However, at the request of the State or county, FEMA will continue to evaluate the drills each year. The counties have informally agreed that they will alternate the FEMA-evaluated medical drills between the two (2) counties each year.

### 6.3 Drills

5. Radiological Monitoring Drills: Radiological drills will include plant and environmental measurements of appropriate sample media in accordance with the drill scenario. These drills will be held annually.
6. In-Plant Radiation Protection Drills: Radiation protection drills, including response to and analysis of simulated elevated airborne and liquid samples and direct radiation measurements, will be conducted semiannually.
7. Augmentation Drill: Augmentation drills requiring travel to the site shall be conducted once every 24 months.
8. SAMG Drills: Severe Accident Management Guideline tabletop and/or inter-facility mini-drills will be conducted periodically and will involve a combination of some of the principal functional areas of the organization's onsite emergency response capabilities similar to that described in General drills (6.3.3.1) above.

6.3.4 The Supervisor - Emergency Preparedness, or designee, is responsible for performing the system checks in Step 6.3.3.2 and coordinating with appropriate plant personnel for the conduct of previously listed drills, except fire drills which are coordinated by Fire Protection. The Supervisor - Emergency Preparedness shall provide:

1. The date, time period, place, and participants.
2. Events to be simulated.
3. Time schedule of initiating events, real and simulated.
4. A narrative summary describing the conduct of the drill.
5. Qualified Controller/Evaluators/Observers to evaluate the drill.
6. A review of the drill evaluation and distribution of copies to affected personnel.
7. Initiation of comments/changes to PEPs, resulting from the drill.

## 6.4 Exercises

- 6.4.1 An emergency exercise will be conducted once every two calendar years and will be based on a scenario which ultimately is declared as a Site Area Emergency or higher.
- 6.4.2 The scenario will be varied from exercise to exercise such that all elements, including Ingestion Pathway Activities; of the plant, county, and state plans and emergency organizations are tested within a six-year period. Over a six-year period, provision should be made for one exercise to take place between 6:00 p.m. and midnight and another between midnight and 6:00 a.m.
- 6.4.3 Advance knowledge of the scenarios and the times of the exercises will be kept to a minimum to ensure a realistic participation by those involved.
- 6.4.4 The Supervisor - EP is responsible for the planning and conduct of exercises and is responsible for providing the following:
1. The basic objectives of the exercise
  2. The date(s), time period, place(s) and participating organizations
  3. Events to be simulated
  4. Time schedule of initiating events, real and simulated
  5. Initial plant conditions on first message card to the Simulator
  6. A narrative summary (scenario) describing the conduct of the exercise to include such things as simulated casualties, outside agencies, personnel rescue, use of protective clothing, deployment of radiological monitoring teams, and public information activities.
  7. Coordination with outside agencies (e.g., local, state, federal organizations) to ensure participation by appropriate support groups
  8. Qualified controller/evaluators/observers to evaluate the exercise

## 6.4 Exercises

9. Review of exercise evaluation and distribution of copies to affected personnel
10. Conduct of critique and resolution of those items identified

6.4.5 Each exercise scenario will include a list of performance objectives and a description of the expected responses. Specific tasks to be evaluated are:

1. Condition recognition and reporting
2. Assessment
3. Off-site notification, including CP&L off-site personnel and protective action determination
4. Off-site response
5. Site response coordination, including communications, logistics, facility manning, information gathering and analysis, and coordination with off-site agencies
6. Response actions to correct identified problems
7. Protective actions
8. Record keeping
9. Monitoring
10. Plant Operation

## 6.5 Planning of Exercises

A rolling six (6) year schedule (past five years and planned sixth year) of exercise objectives will be maintained by Emergency Preparedness to demonstrate the performance and frequency of required activities.



## REVISION SUMMARY

Revision 4 of OPEP-04.08 consists of the following:

- Added new Section 2.4 reference to reflect NUREG-0654, Section P.4 guidance for review/update of letters of agreement.
- Added grammatical corrections to Sections 2.1, 3.1, 3.2 and 5.2.1.
- Revised Sections 3.2, 4.1.1, and 5.2.7 to clarify the certification/review and periodicity requirement for update of letters of agreement with offsite agencies.
- Added title of OPEP-04.1 in Section 4.1.5 for clarification.

## LIST OF EFFECTIVE PAGES

<u>Pages</u>	<u>Revision</u>
1-6	4

## TABLE OF CONTENTS

SECTION	PAGE
1.0 PURPOSE .....	4
2.0 REFERENCES.....	4
3.0 GENERAL .....	4
4.0 RESPONSIBILITIES .....	4
5.0 PROCEDURE .....	5

## **1.0 PURPOSE**

The purpose of this procedure is to describe the process for conducting the Annual Review of the Radiological Emergency Response Plan, and the review of Plant Emergency Procedures, to ensure revisions do not decrease the effectiveness of the Emergency Plan.

## **2.0 REFERENCES**

- 2.1 Brunswick Radiological Emergency Response Plan (OERP)
- 2.2 10 CFR 50.54(q)
- 2.3 REG-NGGC-0002, 10 CFR 50.59 and Other Regulatory Evaluations
- 2.4 NUREG-0654, Section P.4

## **3.0 GENERAL**

- 3.1 The Brunswick Radiological Emergency Response Plan (OERP) is intended to provide the frame work for a program which ensures continuous preparedness. The Plan will be reviewed and revised on an Annual Basis.
- 3.2 OERP, Appendix - B, letters of agreement will be reviewed and certified to be current on an annual basis, and updated, if necessary.
- 3.3 Plant Emergency Procedure revisions shall be reviewed using this procedure.
- 3.4 Conduct of review/revision shall be in accordance with Records Management Procedures.

## **4.0 RESPONSIBILITIES**

- 4.1 The Supervisor - Emergency Preparedness is responsible for:
  - 4.1.1 Annual review of the Radiological Emergency Response Plan, including Appendix B, letters of agreement.
  - 4.1.2 Scheduling and presenting changes to the Plant Nuclear Safety Committee (PNSC) annually (at least once per 366 days).
  - 4.1.3 Maintaining a file of pending changes to the Radiological Emergency Response Plan and implementing procedures.

## 4.0 RESPONSIBILITIES

- 4.1.4 Submittal of the Radiological Emergency Response Plan and Plant Emergency Procedure revisions to the Nuclear Regulatory Commission per 10 CFR 50.54(q) within 30 days of the change. This submittal should include a revision summary of changes.
- 4.1.5 Forwarding approved copies of revisions to the Brunswick Radiological Emergency Response Plan to meet record retention requirements of 10 CFR 50.54(q). (Requirements addressed in OPEP-04.1, Record Keeping and Documentation.)
- 4.1.6 Assigning various sections of the Radiological Emergency Response Plan to knowledgeable personnel as appropriate for review.
- 4.1.7 Ensuring detailed revision summaries are prepared for the Radiological Emergency Response Plan and the Plant Emergency Procedures.
- 4.1.8 Ensuring that implementing procedures are in place to carry out the expectations of the Emergency Plan. Plant Emergency Procedure revisions shall be evaluated per REG-NGGC-0002, 10 CFR 50.59 and Other Regulatory Evaluations, to ensure the effectiveness of the Radiological Emergency Response Plan is not decreased.

## 5.0 PROCEDURE

- 5.1 Maintain a working file of pending changes to the Emergency Plan.
- 5.2 Perform a comprehensive review of each Section of the Emergency Plan.
  - 5.2.1 Verify List of Effective Pages is accurate.
  - 5.2.2 Verify accuracy of the Table of Contents.
  - 5.2.3 Verify References to implementing Procedures and/or other Sections of the plan.
  - 5.2.4 Review Emergency Action Levels, (EALs) including confirmation of equipment match from EALs to Control Room instrumentation.
  - 5.2.5 Review quality of Maps, charts graphs, etc. and replace if necessary.

## 5.0 PROCEDURE

- 5.2.6 Verify Equipment titles/labels including instrument ranges listed in Section 5.0.
- 5.2.7 Review letters of agreement to certify to be current on an annual basis, and update, if necessary.
- 5.2.8 Incorporate changes from file of pending revisions. Ensure that changes will not reduce the effectiveness of the Radiological Emergency Response Plan by utilizing 10 CFR 50.54(q) evaluation per REG-NGGC-0002, 10 CFR 50.59 and Other Regulatory Evaluations. A formal justification of disposition (how it does or does not impact the effectiveness of the emergency plan) for each item is required.
- 5.2.9 Note any changes to implementing procedures that may be required due to the Annual Radiological Emergency Response Plan revision.
- 5.2.10 Verify accuracy of Appendices.
- 5.2.11 Schedule an annual review of changes by the Plant Nuclear Safety Committee.
- 5.2.12 Resolve and incorporate PNSC comments (if any) into annual plan revision.
- 5.2.13 Approve revisions and submit to Document Control with signed Transmittal Letter to the Nuclear Regulatory Commission.
- 5.2.14 Ensure Brunswick Training Section is knowledgeable of revision and the potential need to revise training material.
- 5.2.15 Review changes with State/County Emergency Management personnel.