50-255

Date Entered: May 17, 2000

TO: USNRC/WASHINGTON
JMCKNIGHT Copy Number: 145

TRANSMITAL NUMBER: **152035**

PROCEDURE NUMBER: EI-4.3
TITLE: EMERGENCY OPERATIONS FACILITY ACTIVATION

TRANSMITTAL: LISTED BELOW ARE NEW/REVISED PROCEDURES WHICH MUST BE IMMEDIATELY INSERTED INTO OR DISCARDED FROM YOUR PROCEDURE MANUAL.

Action Required	Section or Description
REMOVE AND DESTROY	EI-4.3, R/11, ENTIRE PROCEDURE
REPLACE WITH	EI-4.3, R/11, ENTIRE PROCEDURE
	EDITORIAL AND APPLICABILITY

SIGN, DATE, AND RETURN THE ACKNOWLEDGEMENT FORM WITHIN 10 DAYS TO THE PALISADES PLANT DOCUMENT CONTROL.

SIGNATURE OR INITIALS _____ DATE _____

A045

NRR-037

Procedure No EI-4.3
Revision 11
Issued Date 5/17/00

PALISADES NUCLEAR PLANT
EMERGENCY IMPLEMENTING PROCEDURE

TITLE: EMERGENCY OPERATIONS FACILITY ACTIVATION

JRBrunet / 5/17/00
Procedure Sponsor Date

JRBrunet / 8/19/99
Technical Reviewer Date

BTaylor / 8/19/99
User Reviewer Date

TITLE: EMERGENCY OPERATIONS FACILITY ACTIVATION

Table of Contents

1.0 PURPOSE 1

2.0 REFERENCES 1

2.1 REFERENCE DOCUMENTS 1

3.0 DEFINITIONS 2

3.1 ACTIVATION 2
3.2 OPERATIONAL SUPPORT TEAM 2
3.3 OPERATIONAL FACILITY 2
3.4 COMMAND AND CONTROL 2
3.5 FULLY OPERATIONAL 2

4.0 INITIAL CONDITIONS AND/OR REQUIREMENTS 2

5.0 PROCEDURE 2

6.0 ATTACHMENTS 3

TITLE: EMERGENCY OPERATIONS FACILITY ACTIVATION

USER ALERT
REFERENCE USE PROCEDURE

Refer to the procedure periodically to confirm that all procedure segments of an activity will be or are being performed. Where required, sign appropriate sign-off blanks to certify that all segments are complete.

1.0 PURPOSE

This procedure provides guidance for the activation, operation, and deactivation of the Emergency Operations Facility (EOF).

2.0 REFERENCES

2.1 REFERENCE DOCUMENTS

2.1.1 Emergency Implementing Procedure EI-1, "Emergency Classification and Actions"

2.1.2 Emergency Implementing Procedure EI-3, "Communications and Notifications"

2.1.3 Emergency Implementing Procedure EI-5.1, "Recovery"

2.1.4 Emergency Implementing Procedure EI-8, "Onsite Radiological Monitoring"

2.1.5 Emergency Implementing Procedure EI-9, "Offsite Radiological Monitoring"

2.1.6 Emergency Implementing Procedure EI-10, "Accident Environmental Assessment"

TITLE: EMERGENCY OPERATIONS FACILITY ACTIVATION

3.0 DEFINITIONS

3.1 ACTIVATION

Process by which the EOF is staffed and prepared for operation.

3.2 OPERATIONAL SUPPORT TEAM

Status of support team following assumption of responsibilities.

3.3 OPERATIONAL FACILITY

Status of the EOF following assumption of command and control.

3.4 COMMAND AND CONTROL

Resides with the EOF Director following assumption of overall authority for Consumers Energy emergency response. At minimum, this individual will assume responsibility for event classification, dose assessment, protective action recommendations, and notification of offsite authorities.

3.5 FULLY OPERATIONAL

Status of the EOF following assumption of all responsibilities.

4.0 INITIAL CONDITIONS AND/OR REQUIREMENTS

The Plant must be at Alert, Site Area Emergency, or General Emergency before initiation of this procedure.

5.0 PROCEDURE

The attachments to this procedure define the responsibilities of the Emergency Operations Facility staff, and provides guidance on tasks to be performed. Individuals assigned as team leaders or to specific identified roles should ensure the attachment checklists are utilized.

TITLE: EMERGENCY OPERATIONS FACILITY ACTIVATION

6.0 ATTACHMENTS

6.1 Attachment 1, "Emergency Operations Facility Director"
Attachment 1.1, "Emergency Operations Facility Status Updates"

6.2 Attachment 2, "Emergency Operations Facility Communication Support Team"
Attachment 2.1, "Emergency Telephone Numbers"
Attachment 2.2, "Additional Emergency Support Request"

6.3 Attachment 3, "Emergency Operations Facility Health Physics Support Team"

6.4 Attachment 4, "Emergency Operations Facility Engineering Support Team"
Attachment 4.1, "Additional Emergency Support Request"

6.5 Attachment 5, "Emergency Operations Facility Governmental Liaison"

6.6 Attachment 6, "Emergency Operations Facility Public Affairs"

6.7 Attachment 7, "Emergency Operations Facility Emergency Planner"

6.8 Attachment 8, "Emergency Operations Facility Administrative Support Team"
Attachment 8.1, "Emergency Operations Facility Floor Plan"

6.9 Attachment 9, "Emergency Operations Facility Property Protection Team"
Attachment 9.1, "Security Augmentation List"
Attachment 9.2, "Security Officer Instructions"
Attachment 9.3, "Consumers Energy Emergency Response Sign In"

6.10 Attachment 10, "Emergency Operations Facility Organization"

6.11 Attachment 11, "Mutual Assistance Agreement Between Detroit Edison, Consumers Energy, and Indiana Michigan Power Company"

TITLE: EMERGENCY OPERATIONS FACILITY DIRECTOR

RESPONSIBILITIES

The EOF Director:

a. Has overall responsibility for the entire Consumers Energy emergency response.

b. Shall have authority to approve any actions or requests for additional assistance.

c. Serves as the primary liaison between the Plant and offsite organizations.

ACTIVATION

1. _____ Establish and maintain a log of key activities. (Attachment 1.1, "Emergency Operations Facility Status Updates," may be used to track updates.)

2. _____ Sign in on the "EOF Emergency Response Staff" status board.

3. _____ Ensure incoming responders have noted their attendance on the status board.

4. _____ Establish communications with Site Emergency Director (SED) and:

   a. Determine extent of emergency situation and what actions have been taken to mitigate the emergency.

   b. Determine which emergency priorities have been set by the SED.

   c. Synchronize EOF clocks with Control Room clock.

   d. Ensure appropriate placards for the emergency classification and Command and Control are in place.

5. _____ Announce there will be no eating or drinking in the facility until habitability is completed.

6. Assemble the Support Team Leaders and:

   _____ a. Conduct a briefing on the emergency situation, Plant status, and actions taken by the Plant to mitigate the emergency.

   _____ b. Assure that a sufficient support staff has been or will be summoned to the Emergency Operations Facility.

   _____ c. Instruct the Support Team Leaders to prepare to assume responsibility for assigned function.

7. _____ As the County Emergency Operation Centers and the Federal Radiological Monitoring and Assessment Center (FRMAC) are activated, dispatch the Governmental Liaisons to these facilities.

8. As specific teams are prepared to perform their functions:

   _____ a. Consult with the SED to transfer responsibilities for that specific team.

   _____ b. Announce to the EOF staff when that team assumes responsibility for that function.

9. Command and control may be transferred when the EOF Director is prepared to assume responsibility for the following functions (at a minimum, Communications, Health Physics and a Reactor Engineer):

   _____ a. emergency classification,

   _____ b. protective action recommendations,

   _____ c. dose assessment, and

   _____ d. offsite notifications.

   _____ e. Ensure all teams have indicated their readiness on the status board.

10. _____ In consultation with the SED and EOF Communications Team Lead, assume Command and Control. Have SED in the TSC make an announcement in the TSC and OSC the EOF is activated and the EOF Director has Command and Control of the emergency.

NOTE: Coordinate timing of turnover with Communications Team Leader so that turnover does not conflict with timing of notifications.

11. _____ Announce to the EOF staff that the facility is fully operational and the EOF Director has Command and Control, and ensure Command and Control sign reflects EOF Director.

12. _____ Brief facility staff on status of the emergency.

13. _____ Coordinate timing of facility briefings to coincide with the TSC/OSC facility briefings, if possible. Additionally, time the 30 minute facility briefings so they do not conflict with communications to the State, ie, notification form update.

OPERATIONAL

1. Maintain Attachment 1.1, "Emergency Operations Facility Status Updates."

2. Perform emergency classification in accordance with Emergency Implementing Procedure EI-1, "Emergency Classification and Actions."

NOTE: **Upgrade to General Emergency classification with the appropriate Protective Action Recommendation (PAR) shall be personally provided to the State Director when the State EOC is operational. The telephone number for the State Director is (517) 336-2699.**

   _____ a. All further changes in emergency classification should be coordinated with the SED.

   _____ b. Ensure the emergency classification placards are updated as the classification changes.

3. Provide protective action recommendations to offsite authorities:

   _____ a. Review and approve protective action recommendations initiated by the Health Physics Support and Engineering Support Teams.

   _____ b. Personally provide initial and revised protective action recommendations to the State Director when the State EOC is operational.

NOTE: Emergency priorities are initiated and revised by the individual who has Command and Control responsibilities.

4. _____ Review emergency priorities and revise as needed. Changes in emergency priorities should be coordinated with the SED and/or the Shift Supervisor (SS).

5. _____ Review and approve all information transmitted to offsite authorities via the Notification Form. Review may be delegated to an assistant.

6. _____ Maintain communications with offsite authorities, particularly the State, brief them on actions undertaken at the Plant and EOF, and determine action being taken offsite.

7. _____ Maintain a line of communication to the SED.

8. _____ Review and approve news releases prepared at the Joint Public Information Center by Consumers Energy Public Affairs personnel.

9. _____ Provide all other assistance requested by the Site Emergency Director or the Palisades Vice President.

RECOVERY

The responsibilities of the EOF Director during the recovery phase of an emergency are addressed in Emergency Implementing Procedure EI-5.1, "Recovery."

DEACTIVATION

When the situation warrants, the Emergency Operations Facility will be deactivated. Close out all files and submit appropriate forms, records, and logs as directed by the EOF Administrative Support Team Leader.

TITLE: EMERGENCY OPERATIONS FACILITY STATUS UPDATES

STATE (30 min)	PLANT (15/30 min)

EOF-Team Leaders (30 min)	EOF-All Personnel (30 min)

TITLE: EMERGENCY OPERATIONS FACILITY COMMUNICATION SUPPORT TEAM

RESPONSIBILITIES

The Communication Support Team acts as the official communicator between the EOF, the Plant, and outside organizations. The Communication Support Team makes and records all official communications from the EOF. This does not preclude support teams communicating to their counterparts at the Plant on technical matters.

ACTIVATION

1. _____ Establish and maintain a log of key activities.

2. _____ Sign in on the "EOF Emergency Response Staff" status board.

3. Prepare for turnover by establishing a communication link with emergency response facility that has offsite communications responsibilities (either the Control Room or Technical Support Center) and review:

   _____ a. Plant status

   _____ b. All organizations contacted and obtain telephone numbers used to contact each organization

   _____ c. All actions initiated by the organizations contacted

   _____ d. Schedule to update the appropriate organizations

   _____ e. Coordinate sequence of message numbers and time frame for notification

   _____ f. Any other information pertinent to facilitating transfer of offsite notifications

4. _____ Establish communications with the following agencies.

NOTE: The State will direct whether the EOF or the State is responsible for notification of local authorities.

a. State of Michigan

Primary: Monitor telephone line 764-1285 which is an extension of the line used in the TSC for State notifications. Verify if notifications are being made every 15 minutes to State Operations, or an open line has been established with the State Emergency Operations Center.

Alternate: (517) 336-6198

b. US NRC (ENS and HPN)

Primary: ENS and HPN (NRC FTS2000 telephone system)
To operate: 1) lift receiver and listen for dial tone, 2) dial first 10 digit number listed on sticker located on telephone, 3) if no answer proceed to next 10 digit number (continue until contact is made with NRC).

Alternate: (301) 951-0550

c. Region III

(630) 829-9500 (contact only as necessary or requested)

Once the Communication Support Team is operational, provide information to these agencies every 15 minutes or at a mutually agreed upon schedule, using the Emergency Notification Form found in Emergency Implementing Procedure EI-3, "Communications and Notifications," Attachment 1.

5. When it is determined the following responsibilities can be adequately addressed, notify the EOF Director that the Communication Support Team is ready to assume responsibility for communication support.

_____ a. Sufficient Communication Support Team members have arrived and notification of offsite authorities can be made by EOF personnel.

_____ b. Personnel have been assigned to update the "Notification Forms" bulletin board.

_____ c. Sufficient equipment has been verified available and functional.

_____ d. An operable communication line between the Emergency Operations Facility Communication Support Team and the Technical Support Center Communication group has been established.

_____ e. Next message number and time are current on status board.

_____ f. An operable communication link is available to those agencies listed in Step 4 above, and Attachment 2.1, "Emergency Telephone Numbers."

6. _____ Indicate on the "EOF Emergency Response Staff" status board that the Communication Support Team is ready.

TITLE: EMERGENCY OPERATIONS FACILITY COMMUNICATION SUPPORT TEAM

7. Notify the following when the EOF Communication Support Team is operational and is prepared to assume responsibility.

   _____ a. Plant Technical Support Center.

   _____ b. All organizations in Step 4 above.

   _____ c. Any other organizations as specified by the Technical Support Center Communicator.

OPERATIONAL

1. _____ Ensure that a log of key activities is maintained.

2. _____ Document incoming messages on a Form 40 and distribute as appropriate.

3. _____ Ensure that logs of incoming and outgoing messages are being maintained.

4. _____ Establish an update schedule to provide information to those agencies listed in Step 4 above, and Attachment 2.1, "Emergency Telephone Numbers."

5. Ensure the Emergency Notification Form found in Emergency Implementing Procedure EI-3, "Communications and Notifications," Attachment 1 is generated for use in updating offsite agencies.

   _____ a. Update status board with next message number and time.

   _____ b. Obtain the current Emergency Notification Form from the Health Physics Team who has completed items 5 through 10.

   _____ c. Ensure that a new Emergency Notification Form is used for each update and that the message number, date and time are updated.

NOTE: **Use the Emergency Notification Form line 4.D, Additional Information, if the State or County requests the following information:**
   1. Estimate of surface contamination in Plant, onsite, and offsite.
   2. Consumers Energy emergency response actions underway.
   3. Requests for support from organizations.

   _____ d. Complete the remainder of the Emergency Notification Form.

NOTE: **Upgrade to General Emergency classification with the appropriate Protective Action Recommendation (PAR) shall be personally provided by the EOF Director to the State Director when the State EOC is operational. The telephone number for the State Director is (517) 336-2699.**

   _____ e. Ensure the EOF Director has approved the Emergency Notification Form prior to release of information.

TITLE: EMERGENCY OPERATIONS FACILITY COMMUNICATION SUPPORT TEAM

6. _____ If additional emergency support is required, contact the appropriate group listed in Attachment 2.1, "Emergency Telephone Numbers," Non-Company Support section, and provide the information listed in Attachment 2.2.

7. _____ Continue to inform the EOF Director of actions being taken by the EOF Communication Support Team.

8. _____ Continue to make any communications as directed by the EOF Director.

9. _____ If the estimated duration of the incident warrants, arrange a relief rotation schedule with the EOF Administrative Support Team Leader.

10. _____ Provide support as requested by the EOF Director.

DEACTIVATION

When the situation warrants, the EOF will be deactivated. Agencies contacted during the emergency should be informed that the EOF is deactivated. Close out all communications as directed by the EOF Director. Close out all files and submit appropriate forms, records, and logs as directed by the EOF Administrative Support Team Leader.

TITLE: EMERGENCY TELEPHONE NUMBERS

MANDATORY NOTIFICATIONS: Organizations to be notified and updated as conditions warrant:

(1)	Consumers Energy Legal Department James Brunner	517-788-1257
(2)	Consumers Energy Insurance Department Director, Robert Frounfelker	517-788-0714 517-782-3356 (night)
(3)	Nuclear Mutual Limited Suite 1200 Manufacturers Hanover Plaza 1201 Market Street Wilmington, Delaware 19801	302-888-3000
(4)	American Nuclear Insurers	860-561-3433

NON-COMPANY SUPPORT

(1)	Department of Energy, Radiological Assistance Team	630-252-4800
(2)	Institute for Nuclear Power Operations	800-321-0614 (Primary) 770-644-8000 (Switchboard) 770-644-8549 (Telecopier) 770-644-8567 (Telecopier) 770-644-8594 (Telecopier)
(3)	Electric Power Research Institute	415-855-2000
(4)	Bechtel Associates Katherine Hann	301-417-4452 301-253-3672 (night)
(5)	General Electric Co Note: Ask to be connected with the GE Emergency Support Program Duty Manager.	408-971-1038 (24 hour)
(6)	ABB - Combustion Engineering, Inc	860-285-9669 or 860-285-9670
(7)	Framatome Technologies (24-Hour Maintenance)	804-832-3000 or 804-832-2762
(8)	Westinghouse Electric Jack Semelsberger	616-764-2004 616-428-7076 (night)
(9)	Siemans Westinghouse Tim Garvin	616-764-2745 616-639-0345 (night)
(10)	Siemans, Richland, WA	509-375-8100
(11)	Sargent & Lundy Engineers	312-269-3886 312-269-3737 312-269-7777 (night)
(12)	Other Reference: INPO Emergency Resources Manual	

TITLE: ADDITIONAL EMERGENCY SUPPORT REQUEST

1. Date _____ Time _____
2. Name and title of person making request _____
3. Nature of emergency _____
4. Plant _____ Location _____
5. When the help is needed _____
6. Where the help is wanted _____
7. Work to be done _____
8. Where the help should report _____
9. The name and title of person to report to _____
10. Number of personnel requested _____
11. Classification of personnel _____
12. Estimated time duration for additional support _____
13. Equipment needed: _____
14. Material needed: _____
15. Services needed: _____
16. Other information: _____

TITLE: EMERGENCY OPERATIONS FACILITY HEALTH PHYSICS SUPPORT TEAM

RESPONSIBILITIES

The Health Physics Support Team Leader is responsible for a) coordinating with the EOF Director on PAG recommendation and updates, b) assisting the EOF Director in emergency classification, c) assuring the Health Physics Support Team actions are consistent with events occurring in the Plant, and d) directing environmental sampling activities.

ACTIVATION

Primary Staffing

Upon arrival at the EOF, the Health Physics Support Team Leader should initiate the following actions:

1. _____ Establish radiological controls in the EOF assuring a frisking station is established and verifying the meter is operational.

2. _____ Sign in on the "EOF Emergency Response Staff" status board.

3. _____ Establish and maintain a log of key activities.

4. _____ Review all previous notification forms sent to the State of Michigan.

5. Establish communications with the TSC Health Physics group and review:

   _____ a. Current Plant status.

   _____ b. Protective actions recommended to the state.

   _____ c. Current protective actions initiated by the state.

   _____ d. Offsite dose calculations result if a release has occurred or projected dose calculations of a potential radiological release.

   _____ e. Telephone numbers currently being used to communicate with the State of Michigan and NRC.

   _____ f. Actions initiated by the State of Michigan and NRC dose assessment organizations.

   _____ g. The update schedule established to provide the State of Michigan and NRC with current information.

6. _____ Brief the EOF Director on Health Physics aspects of the emergency.

7. _____ Establish the Health Physics Support Team as defined in the Operational Section of this attachment.

8. _____ When the responsibilities defined in the Operational Section of this attachment can be adequately addressed by the Health Physics Support Team, notify the EOF Director that the team is ready to assume responsibility for providing Health Physics support.

TITLE: EMERGENCY OPERATIONS FACILITY HEALTH PHYSICS SUPPORT TEAM

9. _____ Indicate on the "EOF Emergency Response Staff" status board that the Health Physics Support Team is ready.

10. _____ Assume responsibility for providing Health Physics support when the Health Physics Support Team is ready.

OPERATIONAL

Secondary Staffing

The Health Physics Support Team members will be assigned the following actions:

1. HP Technical Assessment

   _____ a. Coordinate HP team actions.

   _____ b. Evaluate PAG recommendations and update as appropriate.

   _____ c. Review and approve Notification Form which has been completed by the Radiological Assessor.

   _____ d. Monitor HP status boards for data entry and accuracy.

   _____ e. Provide technical support to Health Physics Support Team members. (ie, selection of source term calculation approach, and selection of offsite monitoring team assignments and general sampling areas)

   _____ f. Use Trend Graph Status Board to track radiological conditions.

   _____ g. Interface with State of Michigan on technical issues as requested.

   _____ h. Evaluate the use of Potassium Iodide (KI) per Emergency Implementing Procedure EI-8, "Onsite Radiological Monitoring," and Emergency Implementing Procedure EI-9, "Offsite Radiological Monitoring."

2. Radiological Assessment

   _____ a. Calculate average energy, release rates, and dose estimates.

   _____ b. Complete Notification Form found in Emergency Implementing Procedure EI-3, "Communications and Notifications," Attachment 1, for designated HP Technical Assessment review and approval.

3. Offsite Team Communication

NOTE: Radio is the primary means of communication with the offsite teams, and backup is cellular telephones, 616-921-5395 and 616-921-5396.

   _____ a. Communicate instructions to offsite teams.

   _____ b. Record offsite monitoring team data on status board.

TITLE: EMERGENCY OPERATIONS FACILITY HEALTH PHYSICS SUPPORT TEAM

_____ c. Update offsite teams with Plant status including event classification, changes in meteorological data, changes in release information, and protective action recommendations.

_____ d. Track cumulative dose for members of the offsite monitoring teams.

4. Meteorological Assessment

_____ a. Obtain current meteorological data and provide it to Radiological Assessor.

_____ b. Obtain meteorological forecast and provide it to the Health Physics Support Team Leader.

5. EOF Habitability Assessment

_____ a. Perform habitability assessment and inform EOF Director of the results. Also, announce results in a facility briefing.

b. If the EOF is determined to be within the pathway of a radioactive plume:

_____ Monitor airborne radioactivity levels within the EOF, and

_____ Issue EOF personnel TLDs and maintain TLD assignment records.

6. Data Recording

_____ a. Record meteorological and radiological data (from the Emergency Notification Form) on status board.

_____ b. Post radiological data on trend graphs as requested by HP Technical Assessment.

7. Segmented Gaussian Dose Assessment

_____ a. Track and define plume using segmented dose model.

_____ b. Update team leader on latest plume location and magnitude.

8. Federal Radiological Monitoring and Assessment Center (FRMAC) Liaison

_____ a. Upon activation of the FRMAC, the Health Physics Support Team leader will assign an individual to report to the FRMAC per Attachment 5 of this procedure.

RECOVERY

During the reentry/recovery phase, the Health Physics Support Team Leader will direct the environmental sampling activities as described in Emergency Implementing Procedure EI-10, "Accident Environmental Assessment."

DEACTIVATION

When the situation warrants, the EOF will be deactivated. Close out all communications as directed by the EOF Director. Close out all files and submit appropriate forms, records, and logs as directed by the EOF Administrative Support Team Leader.

TITLE: EMERGENCY OPERATIONS FACILITY ENGINEERING SUPPORT TEAM

RESPONSIBILITIES

The Engineering Support Team Leader is responsible for providing a) engineering support for the EOF HP Support Team necessary in performing source term calculations, b) interpretation of technical Plant engineering, reactor engineering, and accident analysis to the EOF Director, c) technical support for the Plant, and d) interpretation of operational aspects of the emergency to the EOF Director. In addition, the Team Leader should focus the team members toward looking ahead in an attempt to be proactive with problems that may arise in the Plant and their impact beyond Plant boundaries.

ACTIVATION

Upon arrival at the EOF, the Engineering Support Team Leader should initiate the following actions:

1. _____ Sign in on the "EOF Emergency Response Staff" status board.

2. _____ Establish and maintain a log of key activities.

3. Establish communications with counterpart group in the Technical Support Center (see Emergency Implementing Procedure EI-3, "Communications and Notifications," Attachment 3 for telephone numbers), and:

   _____ a. Review the Plant parameters and safety function status.

   _____ b. Review all engineering recommendations and calculations made.

   _____ c. Review recommendations to prevent and/or limit core damage.

   _____ d. Review actions initiated by the Plant as they relate to engineering matters, and safe shutdown.

4. _____ Indicate on the "EOF Emergency Response Staff" status board that the Engineering Support Team is ready.

OPERATIONAL

1. Engineering Support Team Leader

   _____ a. Ensure that a log of key activities is maintained.

   _____ b. Provide engineering support for the EOF HP Support Team necessary in performing source term calculations.

   _____ c. Provide the EOF Director and Plant TSC Engineering group with engineering interpretation and recommendations.

   _____ d. Provide the EOF Director with a summary of all Plant actions as they pertain to Plant engineering, and reactor engineering/accident analysis.

   _____ e. Maintain status board trending reactor parameters with correct and current Plant information.

   _____ f. Maintain Emergency Priorities/Vital Equipment Out of Service status board.

TITLE: EMERGENCY OPERATIONS FACILITY ENGINEERING SUPPORT TEAM

_____ g. Request additional support from offsite by completing Attachment 4.1, "Additional Emergency Support Request," and submit to EOF Communications.

_____ h. If the estimated duration of the incident warrants, arrange with the EOF Administrative Support Team Leader to have a relief support team assembled.

2. Technical Information Facilitator (TIF)

_____ a. Maintain the Sequence of Events board in the EOF.

_____ b. Remain on the dedicated group line until relieved by another qualified individual.

_____ c. Assist the EOF Director in maintaining communications with the Control Room, TSC, and OSC.

_____ d. Discuss EOF priorities with the other facility TIFs and notify EOF leadership of impending conflicts.

_____ e. Notify EOF leadership of important and/or emergency developments.

3. Operations Liaison

_____ a. Consult with the EOF Director and his staff regarding the operational aspects of the emergency.

_____ b. Assist with the trending of important operational parameters, as appropriate.

_____ c. Assist EOF personnel in the interpretation of trends in operational parameters and discuss the ramifications of events or developments, as needed.

_____ d. Attend Team Leader briefings as a resource for the EOF Director.

DEACTIVATION

When the situation warrants, the EOF will be deactivated. Close out all communications as directed by the EOF Director. Close out all files and submit appropriate forms, records, and logs as directed by the EOF Administrative Team Leader.

TITLE: ADDITIONAL EMERGENCY SUPPORT REQUEST

1. Date _____ Time _____
2. Name and title of person making request _____
3. Nature of emergency _____
4. Plant _____ Location _____
5. When the help is needed _____
6. Where the help is wanted _____
7. Work to be done _____
8. Where the help should report _____
9. The name and title of person to report to _____
10. Number of personnel requested _____
11. Classification of personnel _____
12. Estimated time duration for additional support _____
13. Equipment needed: _____

    _____

    _____

14. Material needed: _____

    _____

    _____

15. Services needed: _____

    _____

    _____

16. Other information: _____

    _____

    _____

    _____

    _____

TITLE: EMERGENCY OPERATIONS FACILITY GOVERNMENTAL LIAISON

RESPONSIBILITIES

1. State Emergency Operations Center (SEOC) Liaison

   The Liaison to the State is responsible for a) functioning as a member of the State EOC Executive Group. As such you will be involved in advising the State on protective action decisions, b) clarifying/interpreting communications and verifying information between the Company's EOF and the SEOC, and c) being a technical resource on Plant operations for State emergency response personnel.

2. County Emergency Operations Center (EOC) Liaison

   The County EOC Liaison is responsible for being a technical resource on Plant operations for county emergency response personnel.

3. Federal Radiological Monitoring and Assessment Center (FRMAC) Liaison

   The FRMAC Liaison is responsible for providing radiological information and technical support.

ACTIVATION

1. SEOC Liaison

   Upon notification of activation of the EOF, proceed directly to the SEOC located at:

   4000 Collins Road
   Lansing, MI

2. County EOC Liaison

   Upon arrival at the EOF, the County EOC Liaisons should:

   _____ a. Notify the EOF Director or Administrative Support Team Leader of your arrival.

   _____ b. Monitor the situation at the EOF to prepare for functioning as the County EOC Liaison.

   _____ c. Upon direction from the EOF Director or Administrative Support Team Leader, proceed to assigned County EOC.

Van Buren County:	Basement of County Courthouse Annex Paw Paw, Michigan
Berrien County:	Lower Level of Sheriff Department St Joseph, Michigan
Allegan County:	Allegan County Building Allegan, Michigan

TITLE: EMERGENCY OPERATIONS FACILITY GOVERNMENTAL LIAISON

3. FRMAC Liaison

Upon activation of the FRMAC, the Health Physics Support Team Leader will assign an individual to report to that facility as a liaison.

OPERATIONAL

1. SEOC Liaison

Upon arrival at the State facility, the SEOC Liaison should:

_____ a. Notify State management personnel of your arrival.

_____ b. Function as a member of the State Executive Group. As such you will be involved in advising the State on protective action decisions.

_____ c. Monitor the situation from within the SEOC to obtain information. If clarification of the situation is necessary, call Communications at the EOF (see Emergency Implementing Procedure EI-3, "Communications and Notifications," for telephone numbers).

_____ d. Ensure that State management personnel are aware of the latest protective action recommendation made by the Company.

NOTE: Official word of those recommendations must come from the EOF Director.

_____ e. Ensure EOF officials are aware (through EOF Communications) of major activities being undertaken by the State in response to the emergency (eg, protective actions ordered by the State for the public).

2. County EOC Liaison

Upon arrival at the county EOC:

_____ a. Notify management personnel of your arrival.

_____ b. Monitor the situation to obtain information. If clarification of the situation is necessary, call Communications at the EOF (see Emergency Implementing Procedure EI-3, "Communications and Notifications," for phone numbers).

_____ c. Ensure EOF officials are aware (through EOF Communications) of major activities being undertaken in response to the emergency

TITLE: EMERGENCY OPERATIONS FACILITY GOVERNMENTAL LIAISON

3. FRMAC Liaison

Upon arrival at the FRMAC:

_____ a. Notify management personnel of your arrival.

_____ b. Provide support and radiological information to the State, NRC, and local authorities such as:

- Plume deposition predictions
- Airborne radiological concentrations
- Deposition patterns of isotopic concentrations, exposure rates and dose projections
- Isotopic concentrations in environmental media
- Current meteorological conditions and weather forecast

TITLE: EMERGENCY OPERATIONS FACILITY PUBLIC AFFAIRS

RESPONSIBILITIES

The Public Affairs Communicator/Technical Advisor is responsible for the flow of information between the EOF and the Joint Public Information Center (JPIC).

ACTIVATION

1. _____ Sign in on the "EOF Emergency Response Staff" status board.
2. _____ Establish and maintain a log of key activities.
3. _____ Establish a communications link with the JPIC.

OPERATIONAL

1. _____ Update the JPIC on the status of the emergency.
2. _____ Communicate information requests from the JPIC to the EOF Director.
3. _____ Have draft news releases from the JPIC reviewed and approved by the EOF Director.
4. _____ Notify the JPIC of any revisions needed to news releases that have been reviewed and approved by the EOF Director.
5. _____ Fax the news releases with the appropriate approval noted on them to the JPIC.

TITLE: EMERGENCY OPERATIONS FACILITY EMERGENCY PLANNER

RESPONSIBILITIES

The Emergency Planner acts as resource person in technical and nontechnical areas for all participants to ensure an efficiently operated facility and interface between participants at all emergency response facilities (both Company and non-Company).

ACTIVATION

1. _____ Sign in on the "EOF Emergency Response Staff" status board and continue to monitor the status of the emergency with the EOF Director.

2. _____ Establish and maintain a log of key activities.

3. _____ Verify the extent of the emergency situation with the EOF Director.

OPERATIONAL

1. _____ Ensure that a log of key activities is maintained.

2. _____ Provide assistance as requested by the EOF Director.

3. _____ Provide assistance as requested by the Health Physics and Engineering Support Team.

4. _____ Provide requested liaison support between Consumers Energy and non-Consumers Energy groups.

5. _____ Ensure that facility status boards are periodically updated.

DEACTIVATION

When the situation warrants, the Emergency Operations Facility will be deactivated. Close out all communications as directed by the EOF Director. Close out all files and submit appropriate forms, records, and logs as directed by the EOF Administrative Support Team Leader.

TITLE: EMERGENCY OPERATIONS FACILITY ADMINISTRATIVE SUPPORT TEAM

RESPONSIBILITIES

The Emergency Operations Facility Administrative Support Team Leader is responsible for a) setting up the Emergency Operations Facility (EOF), b) coordinating and maintaining all support services required to keep the EOF operating in a reliable and efficient manner, c) coordinating the administrative functions and operation of the EOF d) administering the call-out provisions regarding alcohol in the Fitness for Duty Procedures.

ACTIVATION

Upon arrival at the EOF, the Emergency Operations Facility Administrative Support Team Leader should initiate the following actions:

1. _____ Maintain a log of key activities.

2. _____ Sign in on the "EOF Emergency Response Staff" status board.

3. _____ Ensure South Haven Conference Center personnel set up the EOF in accordance with Attachment 8.1 of this procedure.

4. _____ Verify that all support equipment has been set up and is functioning properly. If not, arrange to have equipment repaired.

5. _____ Establish security per Attachment 9 of this procedure to restrict access to the EOF.

6. _____ Administer the call-out provisions regarding alcohol in the Fitness for Duty Procedures.

7. Assign Administrative Support personnel to:

   _____ a. Control and maintain the distribution of documents and engineering records with the EOF.

   _____ b. Operate telecopy machines.

   _____ c. Log and distribute received messages to appropriate EOF staff.

   _____ d. Assist the EOF Director, as requested.

8. _____ Verify that support teams have adequate equipment and supplies.

9. _____ Notify the EOF Director as Support Team Leaders indicate a ready status on the "EOF Emergency Response Staff" status board.

TITLE: EMERGENCY OPERATIONS FACILITY ADMINISTRATIVE SUPPORT TEAM

OPERATIONAL

1. Throughout the emergency, ensure the following:

   _____ a. Status boards are being updated.

   _____ b. Tasks assigned to Administrative Support personnel in Step 7 above are being carried out.

   _____ c. Administrative Support personnel assigned to Communications Group record "Sequence of Events" board and have copies distributed to all teams.

2. _____ Provide the EOF Director with security information and recommendations.

3. _____ Provide the EOF Director with any pertinent changes in the Plant security status.

4. _____ Make arrangements for replacement and/or repairs of equipment as needed.

5. _____ Arrange for additional phones, lines, radios, or other communications equipment and facilities as needed.

6. _____ Coordinate scheduling of work shifts to staff the EOF on a 24-hour basis.

7. _____ Coordinate set up of food services and lodging for the support staff.

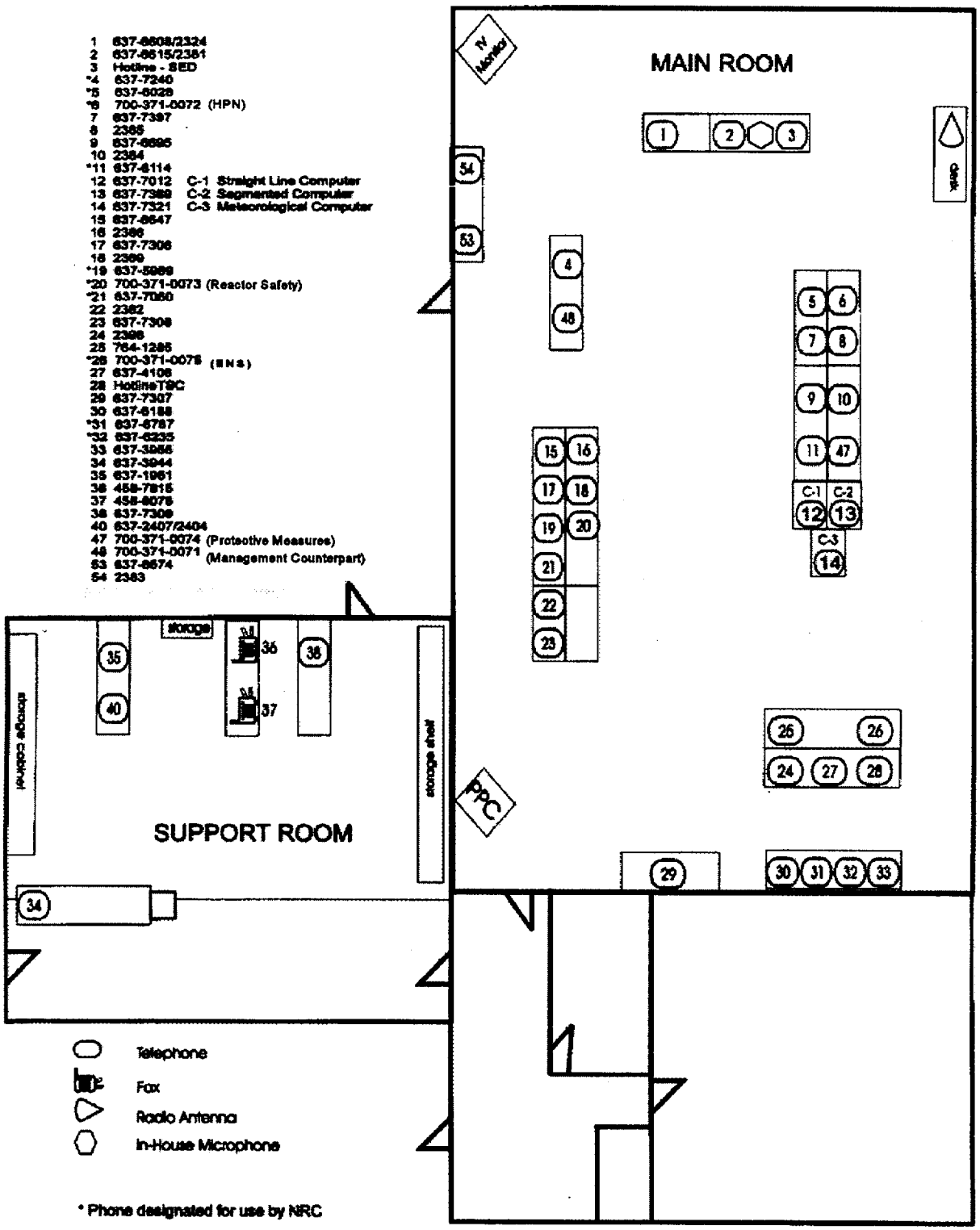
8. _____ Ensure that the needs of the NRC personnel located in the EOF are being addressed.

DEACTIVATION

When the situation warrants, the Emergency Operations Facility will be deactivated. Return all emergency equipment to its respective storage location. Instruct team leaders to submit appropriate forms, records, and logs. File this documentation in the Engineering Records Center, under ERC number 950/22*06/L, with copies to Emergency Planning.

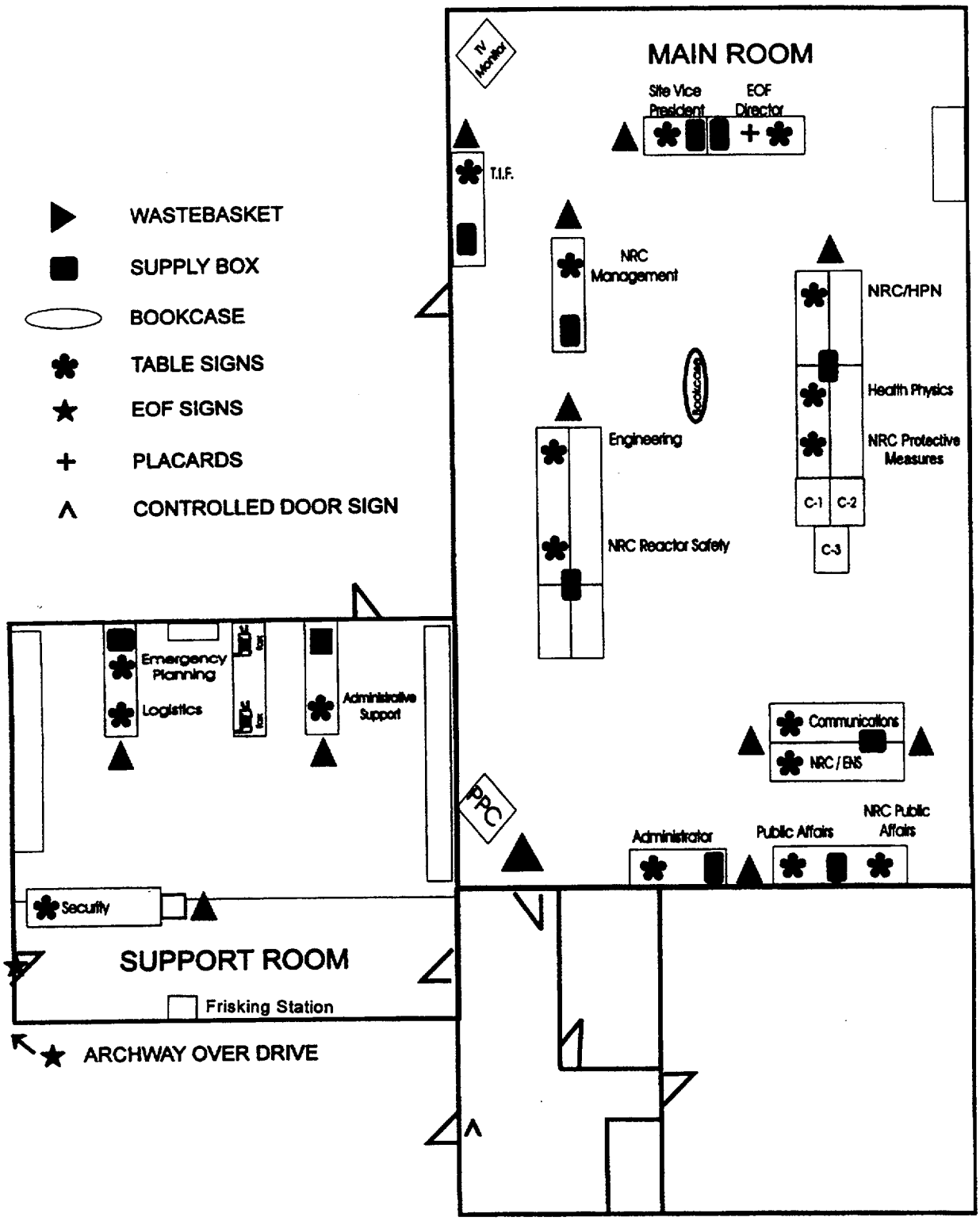
TITLE: EMERGENCY OPERATIONS FACILITY FLOOR PLAN

1 637-6608/2324
2 637-6615/2361
3 Hotline - SED
*4 637-7240
*5 637-6028
*6 700-371-0072 (HPN)
7 637-7397
8 2365
9 637-6695
10 2364
*11 637-6114
12 637-7012 C-1 Straight Line Computer
13 637-7389 C-2 Segmented Computer
14 637-7321 C-3 Meteorological Computer
15 637-6647
16 2366
17 637-7306
18 2369
*19 637-5989
*20 700-371-0073 (Reactor Safety)
*21 637-7060
22 2362
23 637-7308
24 2368
25 764-1285
*26 700-371-0076 (BNS)
27 637-4106
28 HotlineTSC
29 637-7307
30 637-6188
*31 637-6787
*32 637-6235
33 637-3966
34 637-3944
35 637-1961
36 458-7815
37 458-6075
38 637-7309
40 637-2407/2404
47 700-371-0074 (Protective Measures)
48 700-371-0071 (Management Counterpart)
53 637-6674
54 2363



* Phone designated for use by NRC

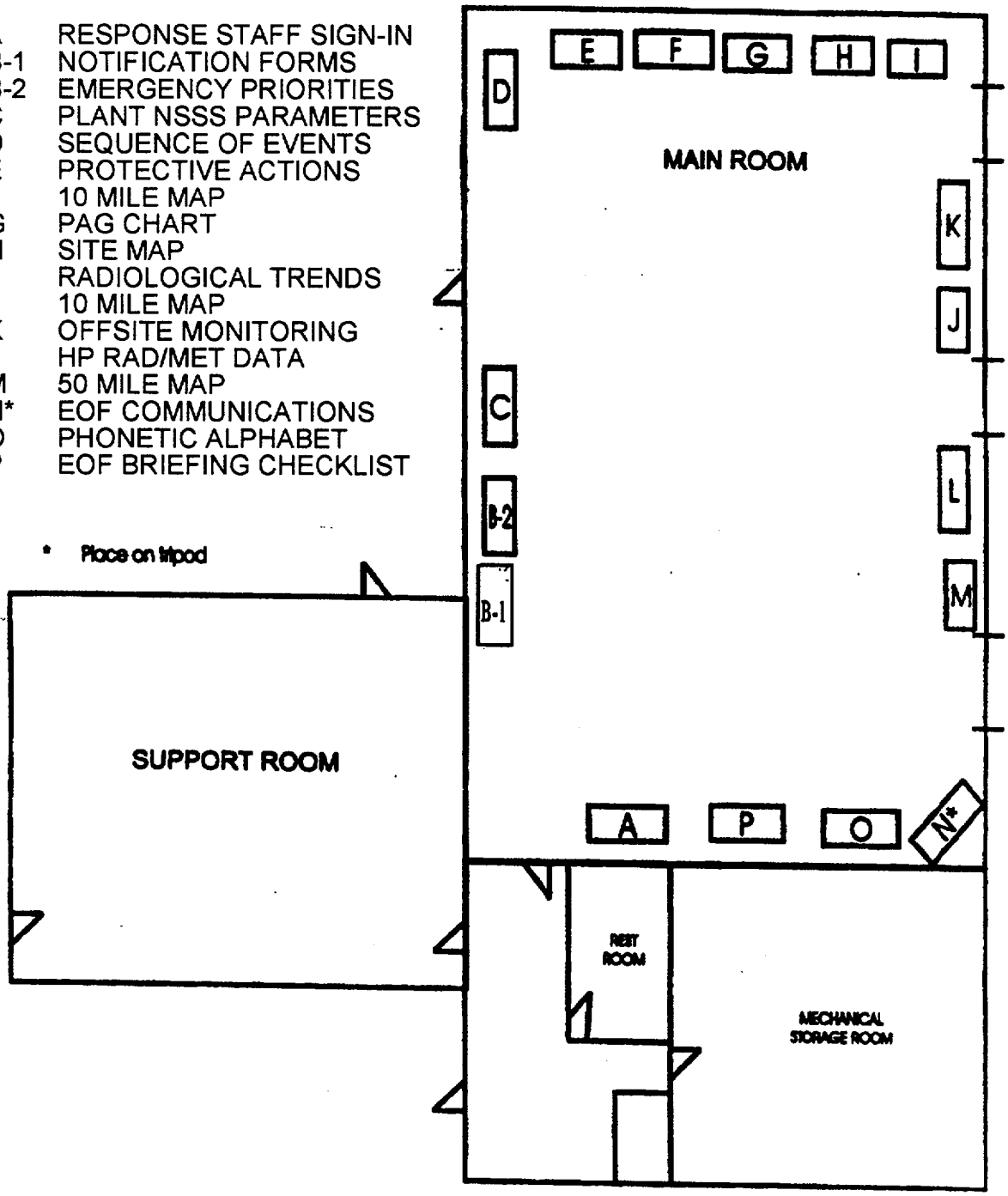
TITLE: EMERGENCY OPERATIONS FACILITY FLOOR PLAN



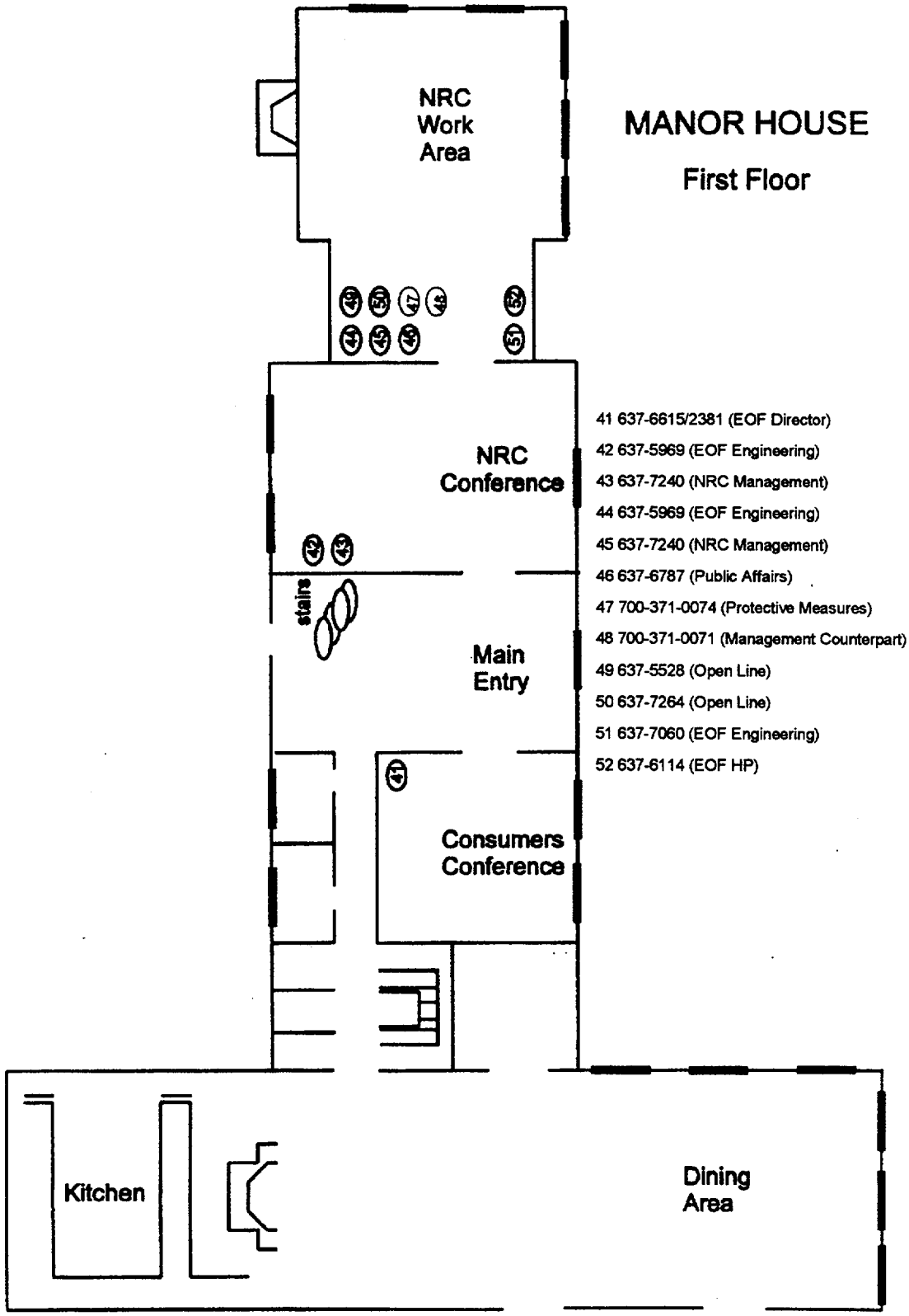
TITLE: EMERGENCY OPERATIONS FACILITY FLOOR PLAN

A	RESPONSE STAFF SIGN-IN
B-1	NOTIFICATION FORMS
B-2	EMERGENCY PRIORITIES
C	PLANT NSSS PARAMETERS
D	SEQUENCE OF EVENTS
E	PROTECTIVE ACTIONS
F	10 MILE MAP
G	PAG CHART
H	SITE MAP
I	RADIOLOGICAL TRENDS
J	10 MILE MAP
K	OFFSITE MONITORING
L	HP RAD/MET DATA
M	50 MILE MAP
N*	EOF COMMUNICATIONS
O	PHONETIC ALPHABET
P	EOF BRIEFING CHECKLIST

* Place on tripod



TITLE: EMERGENCY OPERATIONS FACILITY FLOOR PLAN



TITLE: EMERGENCY OPERATIONS FACILITY PROPERTY PROTECTION TEAM

RESPONSIBILITIES

The Property Protection Team Leader is responsible for a) controlling access and securing the facility, b) coordinating Plant security actions with the security representative in the TSC or the Plant Property Protection Supervisor, c) keeping the EOF Administrative Support Team Leader apprised of the security status at the Plant, d) assisting the Plant Property Protection Supervisor as necessary, and e) interfacing between NRC security and Consumers Energy management.

ACTIVATION

Upon notification of EOF activation, the Property Protection Team Leader, with input from the Plant Property Protection Supervisor, should notify the Contract Security Agency to activate the Nuclear Security Force Augmentation Plan, if necessary, to provide additional security personnel for the affected site and/or the EOF (see Attachment 9.1 of this procedure for contact numbers).

Upon arrival at the EOF, the Property Protection Team Leader should initiate the following actions:

1. _____ Sign in on the "EOF Emergency Response Staff" status board.

2. _____ Establish and maintain a log of key activities.

3. _____ Determine whether security officer staffing is sufficient.

4. _____ Verify the facility has been secured and security officers are properly posted and knowledgeable of their duties.

5. Establish communications with the security representative in the Technical Support Center and/or the Plant Property Protection Supervisor and review as needed:

   _____ a. Security status at the Plant.

   _____ b. Any local law enforcement agency notified and their involvement.

   _____ c. Need for additional personnel or assistance.

6. _____ Brief the EOF Administrative Support Team Leader on security aspects of the emergency.

7. _____ Indicate on the "EOF Emergency Response Staff" status board that the security support team is operational.

TITLE: EMERGENCY OPERATIONS FACILITY PROPERTY PROTECTION TEAM

OPERATIONAL

The Property Protection Team Leader should:

1. _____ Ensure that a log of key activities is maintained.

2. _____ Provide the EOF Administrative Support Team Leader and TSC Security Representative or the Plant Property Protection Supervisor with security information and recommendations.

3. _____ Provide the EOF Administrative Support Team Leader with any pertinent changes in the Plant security status.

4. _____ Provide direction to the security officers securing the EOF.

5. _____ Assist security personnel with breath alcohol testing.

6. _____ If the estimated duration of the incident warrants, arrange with the Contract Security Agency to have a relief support team for the EOF assembled.

7. _____ Serve as the interface between NRC security and Consumers Energy management.

DEACTIVATION

When the situation warrants, the EOF will be deactivated. Close out all security files and submit appropriate forms, records, and logs as directed by the EOF Administrative Support Team Leader.

TITLE: SECURITY AUGMENTATION LIST

Area of Responsibility	Name	Telephone Work	Telephone Home	
Palisades Property Protection	Steve Cote	616-764-2561	616-637-6598	
	Jim Warner	616-764-2585	616-396-8593	
	Brian Rabideau	616-764-2747		
Burns Security	Mark Sowers	616-764-2350		e
	Dan English	517-839-8046	517-631-7962	e

TITLE: SECURITY OFFICER INSTRUCTIONS

1.0 GENERAL REQUIREMENTS

a. Security officers will report to the EOF Administrative Support Team Leader until arrival of the Property Protection Team Leader.

b. All exterior doors of the EOF shall be secured. The entrance at the security sign-in desk may remain open.

c. Entry into the EOF shall be through one door manned by security.

d. At least one security representative assigned to the EOF shall be trained to perform breath alcohol testing.

2.0 ACCESS CONTROL

All personnel entering the EOF will be required to sign in on the Consumers Energy Emergency Response Sign In (Attachment 9.3). Individuals reporting consumption of alcohol within the past five hours will be subject to breath alcohol testing if the EOF Administrator determines that the individual requires access to the EOF. NRC employees are not subject to this test and are not required to indicate whether they have consumed alcohol within the previous five hours. The breath alcohol testing will be performed in accordance with the call-out provisions regarding alcohol in the Fitness for Duty Procedures. e

a. Consumers Energy employees - Individuals who

   1. possess Consumers Energy identification,

   2. are personally recognized by Security personnel,

   3. are cleared by the EOF Administrator will be granted access. Photo identification is to be worn conspicuously at all times when in the EOF. If second shift staffing becomes necessary, personnel being relieved of duty should indicate time of departure on the sign-in sheet beside their name in the "Time Out" column. e

b. Non-Company Employees - Non-Consumers Energy personnel must be cleared by the EOF Administrator or designate. Personnel must present photo identification and register on the Visitor Log Sheet each time they enter or exit. Photo identification is to be worn conspicuously at all times when in the EOF.

c. NRC personnel should present their NRC Identification Badge and sign in on the sign-in sheet. They are not subject to our Fitness for Duty requirements. Photo identification should be worn conspicuously at all times when in the EOF. e

d. Any additions or modifications to instructions will come from the EOF Administrative Support Team Leader or Property Protection Team Leader.

TITLE: SECURITY OFFICER INSTRUCTIONS

3.0 SECURITY STAFFING - SOUTH HAVEN CONFERENCE CENTER EOF

The following security staffing assignments may be made by the EOF Administrative Support Team Leader and/or the Property Protection Team Leader based upon the nature of the emergency or emergency drill. As a minimum, one security representative will be assigned to the EOF to control personnel access and perform breath alcohol testing when necessary.

a. EOF Drive Entrance Officer - To be located at the Conference Center drive entrance.

   1. The officer will allow access to Consumers Energy employees.

   2. Non-Consumers Energy employees will be cleared to enter by contacting Officer Number 2.

b. EOF Conference Center Officer - To be located inside the EOF entry door.

   1. The officer will control access as described in Section 2.0.

   2. Obtain clearance from the EOF Administrator or designate for vehicle access at the drive entrance.

c. EOF Manor House Officer - To be located inside the Manor House.

   The officer will control access to the NRC conference/work area and Consumers Energy conference room as described in Section 2.0.

d. Roving Patrol Officer(s) - To be located on the grounds to control trespassers.

4.0 REQUIRED MATERIALS

a. Portable Radios

b. Log Sheets

c. ID Badging Materials

d. Two Portable Alco-Sensor III Units

PALISADES NUCLEAR PLANT
EMERGENCY IMPLEMENTING PROCEDURE

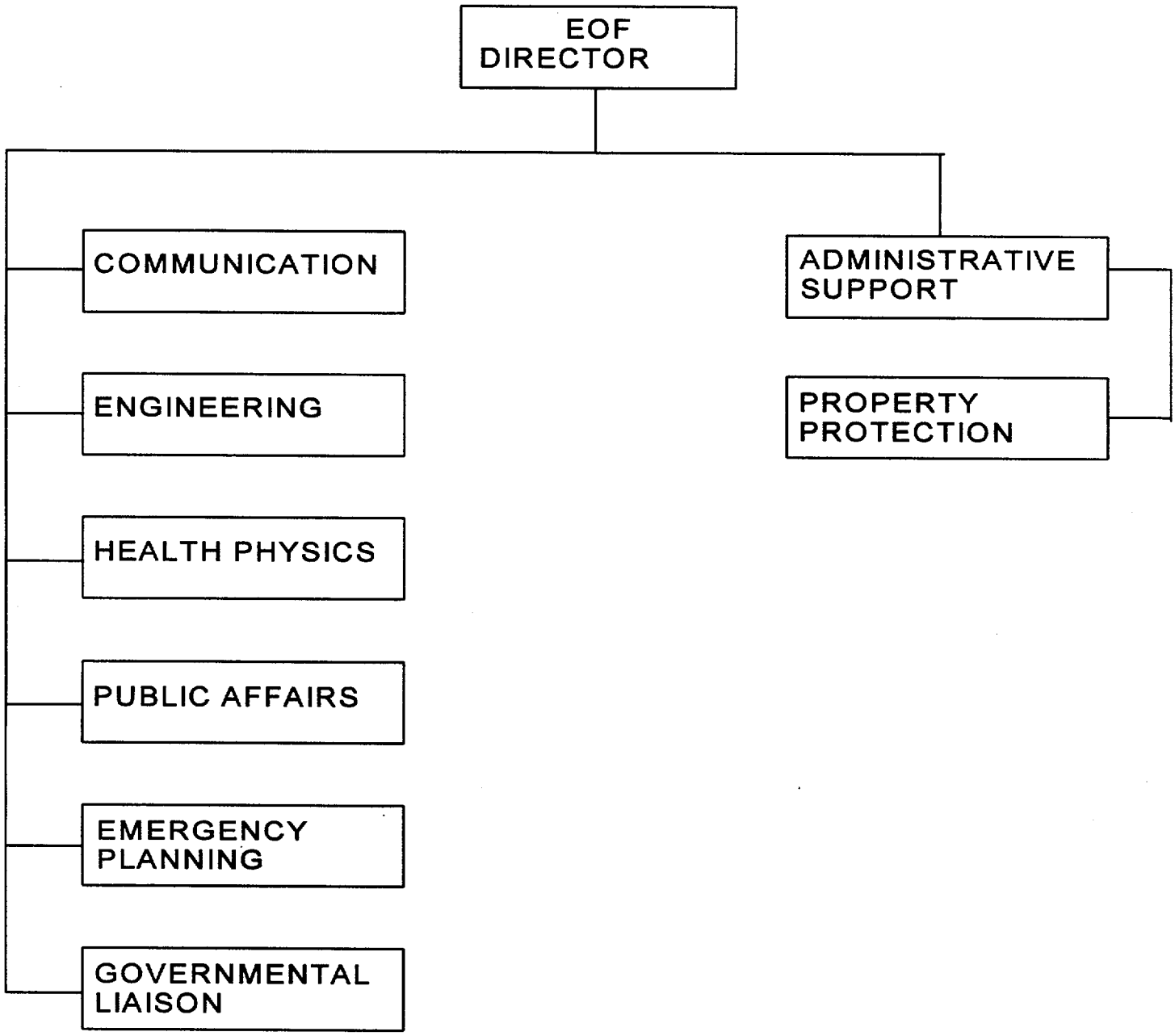
TITLE: CONSUMERS ENERGY EMERGENCY RESPONSE SIGN IN

Plant ____ EOF ____

NAME	BADGE #	AFFILIATION	SOCIAL SECURITY NUMBER	TIME IN	HAVE YOU CONSUMED ALCOHOL IN THE PAST FIVE HOURS? *		TIME OUT
					YES	NO	

*This section to be completed only by individuals fulfilling duties identified in the Emergency Operations Facility Emergency Implementing Procedures or individuals responding to emergency call-in at the Palisades Plant. Actions taken for all "Yes" answers are to be recorded in the Activities Report.

TITLE: EMERGENCY OPERATIONS FACILITY ORGANIZATION



MUTUAL ASSISTANCE AGREEMENT BETWEEN DETROIT EDISON, CONSUMERS ENERGY, AND INDIANA MICHIGAN POWER COMPANY

0.1 Consumers Energy, a Michigan corporation; Detroit Edison, a Michigan and New York corporation; and Indiana Michigan Power Company, an Indiana corporation;

WITNESSETH

0.2 WHEREAS, Consumers Energy, Detroit Edison, and Indiana Michigan Power Company own electric facilities, including nuclear generation stations, and are engaged in the generation, transmission, distribution and sale of electric power and energy in Michigan; and

0.3 WHEREAS, the parties desire to help assure the availability of adequately trained and experienced emergency personnel in the event of an emergency situation at any of their nuclear generating stations;

0.4 NOW, THEREFORE, in consideration of the promises and mutual covenants herein set forth, the parties agree as follows:

ARTICLE I
DEFINITIONS

1.1 "Alert" shall be defined as a situation in which events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant.

1.2 "Emergency" shall be defined consistent with the definition of "site area emergency" as set forth in NUREG 0654 as a situation in which events are in process or have occurred which involve actual or likely major failures of plant functions needed for protection of the public.

1.3 "Requesting party" shall be defined as any party to this Agreement who, upon the occurrence of an emergency at one of its nuclear generating stations, seeks emergency assistance, pursuant to this Agreement, from one or more of the parties hereto.

1.4 "Responding party" or "responding parties" shall be defined as any party or parties to this Agreement who are presented with a request for emergency assistance pursuant to this Agreement.

MUTUAL ASSISTANCE AGREEMENT BETWEEN DETROIT EDISON, CONSUMERS ENERGY, AND INDIANA MICHIGAN POWER COMPANY

ARTICLE II
REQUESTS FOR EMERGENCY ASSISTANCE

2.1 In the event of an alert at one of its nuclear generating stations, any party to this Agreement may notify any or all of the other parties that an alert exists and that their emergency assistance may be required.

2.2 In the event of an emergency at one of its nuclear generating stations, any party to the Agreement may request emergency assistance from any or all of the other parties.

2.3 Requests for emergency assistance shall be made between and among the following party personnel:

Consumers Energy	Senior Vice President Nuclear, Fossil, Hydro Operations
Detroit Edison	Senior Vice President Nuclear Generation
Indiana Michigan Power Company	Vice President Nuclear Generation

ARTICLE III
EXCUSED FAILURE TO RESPOND

3.1 Failure to respond to a request for emergency assistance pursuant to this Agreement shall be excused if, in order to respond, the requested party or parties would be forced in its or their sole judgment or judgments to:

3.1.1 Violate its duties relating to the care and staffing at its own nuclear generating stations; or

3.1.2 Jeopardize the public health or safety at a location other than the location of the requesting party's emergency.

**MUTUAL ASSISTANCE AGREEMENT
BETWEEN DETROIT EDISON, CONSUMERS ENERGY,
AND INDIANA MICHIGAN POWER COMPANY**

ARTICLE IV
SCOPE OF ASSISTANCE

4.1 If requested under this Agreement, the responding party or parties will provide trained and experienced personnel to perform off-site radiation protection activities to the requesting party. All equipment intended for use by the responding personnel, except personal dosimeters and certification documents (such as certificates of Health Physics training, instrument training and dose exposure records), shall be the responsibility of the requesting party to provide. The responding party or parties may use their own equipment if agreeable to the requesting party. However, use by the responding party or parties of their own equipment shall in no way alter the duties and obligations imposed upon the parties by this Agreement.

4.2 Emergency assistance provided by the responding party or parties shall continue until their personnel are dismissed by the requesting party, or are recalled by the responding party to support operations at it own facilities.

4.3 [redacted]

personnel shall be those of the party providing such personnel.

4.5 Personnel provided by responding party or parties shall, at all times during the period in which emergency assistance is being provided, continue to be employees of the responding party or parties. The responding party, and not the requesting party, shall be liable to loaned personnel for any wages, salaries, cost and expenses associated with the provision of emergency assistance.

ARTICLE V
REIMBURSEMENT FOR EMERGENCY ASSISTANCE RENDERED

5.1 The requesting party shall reimburse each responding party for all costs and expenses incurred by each responding party in providing emergency assistance hereunder. Such costs and expenses shall include:

5.1.2.2 Payroll taxes;

5.1.2.3 Hospitalization, surgical and medical coverage;

5.1.2.4 Pensions and life insurance;

5.1.2.5 Vacation, holiday and sick pay;

5.1.2.6 Travel accident insurance;

5.1.3 Transportation to and from the requesting party's service area, including the cost of travel accident insurance purchased expressly for coverage during such transportation;

5.1.4 Food and lodging;

5.1.5 Personal expenses specifically agreed to between the requesting and responding parties;

5.1.6 Charges, at the rates internally used by the responding party, for the use of transportation equipment and other equipment requested; and

5.1.7 Any further costs specifically agreed to between the requesting and responding parties.

5.2 All time sheets and work records pertaining to loaned personnel shall be maintained by the responding party.

5.3 All charges shall be paid by the requesting party to each responding party within ten (10) days after receipt of an invoice, itemized to the satisfaction of the requesting party.

ARTICLE VI
INDEMNIFICATION

6.1 The requesting party shall indemnify and hold harmless each responding party from and against any and all liability for loss, damage, cost or expense which the responding party shall incur by reason of bodily injury, including death, to any person or persons, or by reason of damage to or destruction of any property, including the loss of use thereof, arising out of or in any manner connected with the giving of emergency assistance to the requesting party.

6.2 In the event of bodily injury, including death, to any employee of the responding party, or in the event of damage to or destruction of any property of the responding party, the requesting party shall indemnify the responding party for such loss in the following manner:

**MUTUAL ASSISTANCE AGREEMENT
BETWEEN DETROIT EDISON, CONSUMERS ENERGY,
AND INDIANA MICHIGAN POWER COMPANY**

6.2.1 If such loss is covered by an insurance policy purchased by the responding party from a third party carrier, the requesting party shall make reimbursement to the extent such losses increase the responding party's insurance costs;

6.2.2 If such loss is not covered by an insurance policy purchased by the responding party or exceeds such coverage, the requesting party shall make reimbursement to the extent of the claims or benefits actually paid or the losses sustained by the responding party.

ARTICLE VII
MODIFICATION

7.1 At any time after the date of this Agreement any party, by giving not less than thirty days written notice to the other parties, may from time to time call for reconsideration of the terms and conditions of this Agreement. If such reconsideration is called for, the authorized representatives of the parties shall meet as promptly as convenient and discuss any of the terms and conditions of the Agreement. No party shall be under any obligation to agree to any modification or supplement not satisfactory to it. Any agreement modifying or supplementing such terms and conditions shall be in writing, signed by all parties, and shall specify the date such modification or supplement shall become effective.

ARTICLE VIII
PLAN EXERCISING

8.1 The parties agree to provide, at their own expense, personnel to observe or assist in demonstrating the effectiveness of a nuclear generating station's emergency plan as may be required by that nuclear generating station's NRC approved emergency plan.

ARTICLE IX
TERM OF AGREEMENT

9.1 This Agreement shall continue indefinitely from the date of signing unless and until terminated as provided for in Section 9.2 below.

9.2 Any party, upon sixty (60) days prior written notice to all other parties, may terminate this Agreement.

MUTUAL ASSISTANCE AGREEMENT
BETWEEN DETROIT EDISON, CONSUMERS ENERGY,
AND INDIANA MICHIGAN POWER COMPANY

IN WITNESS WHEREOF, the parties hereto cause this Agreement to be executed by their duly authorized officers on duplicate original pages attached hereto and made a part hereof.

CONSUMERS ENERGY

R. A. Fenech — Date 4-13-99
Senior Vice President
Nuclear, Fossil,
Hydro Operation

DETROIT EDISON COMPANY

D. R. Gipson — Date 4-7-1999
Senior Vice President
Nuclear Generation

INDIANA MICHIGAN POWER COMPANY

R. P. Powers — Date 3/2/99
Vice President

2/25/99