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U. S. Nuclear Regulatory Commission
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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 May 23, 2000. This submittal is required to be submitted within 30 days. Therefore, this submittal is due by June 22, 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 at (815) 458-2801, extension 2980.

Respectfully,


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

Attachment 1

Summary of Changes

1. BwZP 1000-5A1, "Station Augmentation Call Tree"

Editorial changes were made to steps E.2.a.1), E.2.a.2), E.4.a.1) and E.4.a.2) to clarify the script for augmentation callers.

2. BwZP 2000-1, "Assistant Station Director Implementing Procedure"

Step F.5.d was deleted to be consistent with revision 9 of the Generating Station Emergency Plan (GSEP).

3. BwZP 2000-7, "Administrative Director Implementing Procedure"

Added the requirement to maintain a Significant Events Log and Station Priorities Log in the Technical Support Center (TSC) to step F.9 to be consistent with revision 9 of the GSEP.

4. BwZP 2000-7A1, "Administrative Director Checklist"

Added the requirement to maintain a Significant Events Log and Station Priorities Log in the TSC to step 9 to be consistent with revision 9 of the GSEP.

Attachment 2

Implementing Procedures

STATION AUGMENTATION CALL TREE

This procedure describes the method for completing off-hours emergency response staffing utilizing Station Augmentation Callers. This method is designed for use in the event of computer call out system failure.

A. Acting Station Director/Designee Calls:

1. Augmentation Caller # 1
2. Operations Director
3. Emergency Preparedness Coordinator/Trainer

B. Augmentation Caller # 1 Calls:

1. Augmentation Caller # 2
2. Station Director
3. Radiation Protection Director
4. Admin Director
5. ODCS Specialist
6. HPN Communicator
7. OSC Director
8. OSC Supervisor
9. Chemist
10. MM Supervisor

C. Augmentation Caller # 2 Calls:

1. Augmentation Caller # 3
2. Assistant Station Director
3. Environs Director
4. Security Director
5. Control Room Communicators
6. Nuclear Engineer
7. Mechanical Engineer
8. Electrical Engineer
9. Computer Engineer
10. EM Supervisor

D. Augmentation Caller # 3 Calls:

1. Technical Director
2. Maintenance Director
3. Chemistry Director
4. IM Supervisor
5. Communicator/Recorders
6. 2 SAMG Evaluators

E. Activation of the Call Tree is as follows:

1. The Shift Manager/designee contacts an Augmentation Caller on the Call List and provides the following message:
 - a. Indicate whether the Call Out is for an **actual event** or a **drill**.
 - b. Request the Augmentation Caller to initiate the Call List.

NOTE

If this is a **drill**, remind Augmentation Callers that personnel do NOT report to the station. The **drill** should not interfere with normal shift operation. If at anytime during the **drill** an actual event should occur, discontinue the **drill**.

- c. Remind Augmentation Callers that information is NOT to be passed to spouse or children.
- d. Request Augmentation Callers contact the Shift Office when their list is complete or when 30 minutes have elapsed. Use extension _____.

- E. 2. The Shift Manager/designee contacts an Operations Director and Emergency Preparedness staff member and transmits the following message:

NOTE

If this is a **drill**, precede the following message with the statement:
"This is a drill. Do NOT report to the station".

- a. Please respond to the following questions:

1) **"Have you consumed alcohol in the previous 5 hours?"**

- a) If no, proceed to Step E.2.a.2).
b) If yes, proceed to step E.2.a.2) (*circle Y under FFD column to indicate a breath alcohol test is needed*).

2) **"Are you able to work?"**

- a) If yes, and the person has NOT consumed alcohol, say **"Report to your assigned location immediately."** This call may be terminated when the recipient states understanding of the message (*circle the N under FFD*).
b) If yes, and the person HAS consumed alcohol, say **"Please standby for possible dispatch to the station."**
c) If no, say **"Your portion of the call out is complete. No further actions are required."** Ensure recipient states understanding and contact another person for this position from the list.

- E. 3. Augmentation Callers contact the next Augmentation Caller as appropriate, and transmit the following message:
- a. Indicate whether the Call Out is for an **actual event** or a **drill**.
 - b. Request the Augmentation Caller initiate the Call List.

NOTE

If this is a **drill**, remind Augmentation Callers that personnel do NOT report to the station.

- c. Remind Augmentation Callers that information is NOT to be passed to spouse or children.
- d. Request Augmentation Callers contact the Shift Office when their list is complete or when 30 minutes have elapsed. Use extension _____.

- E. 4. The Augmentation Caller contacts personnel for the remaining positions on their list and transmits the following message:

NOTE

If this is a **drill**, precede the following message with the statement **"This is a drill. Do NOT report to the station"**.

- a. Please respond to the following questions:

1) **"Have you consumed alcohol in the previous 5 hours?"**

- a) If no, proceed to Step E.4.a.2).
b) If yes, proceed to Step E.4.a.2) (*circle Y under FFD column to indicate a breath alcohol test is needed*).

2) **"Are you able to work?"**

- a) If yes, and the person has NOT consumed alcohol, say **"Report to your assigned location immediately."** This call may be terminated when the recipient states understanding of the message (*circle the N under FFD*).
b) If yes, and the person HAS consumed alcohol, say **"Please standby for possible dispatch to the station."**
c) If no, say **"Your portion of the call out is complete. No further actions are required."** Ensure recipient states understanding and contact another person for this position from the list.

ASSISTANT STATION DIRECTOR IMPLEMENTING PROCEDURE

A. PURPOSE

This procedure outlines the methods used to implement the duties of the Assistant Station Director under emergency conditions.

B. REFERENCES

1. BwZP 200-1, "Braidwood Emergency Action Levels".
2. BwZP 1000-2, "Offsite Notifications".
3. Reportability Manual.
4. Generating Station Emergency Plan (GSEP).

C. PREREQUISITES

None.

D. PRECAUTIONS

None.

E. LIMITATIONS AND ACTIONS

1. The Assistant Station Director reports to the Technical Support Center (TSC) unless otherwise directed by the Emergency Director.
2. In an emergency, the time used in the Control Room is considered the correct time. All clocks should synchronize to the Control Room to ensure consistency throughout the event.

F. PROCEDURE

1. ACTIVATE the Emergency Offsite Facility (EOF).
2. ENSURE TSC and OSC clocks are synchronized to the Control Room time.
3. SUPERVISE the activities of Communicator/Recorders. ENSURE that current and adequate information is depicted on the TSC Status boards.
4. SUPERVISE the activities of the Administrative Director.
5. ESTABLISH communications with appropriate parties as directed by the Station Director:
 - a. ENSURE the Emergency Response Data System (ERDS) program has been activated by the Control Room. If the program has NOT been started, activate in accordance with BwZP 1000-2.
 - b. ENSURE that all required notifications to offsite governmental agencies is performed.
 - c. ENSURE all information has been reviewed and approved by the Station Director or designee prior to transmittal. Review the contents of the transmittals to ensure information which may have been passed verbally is reflected on the forms.
 - d. MAINTAIN communications, as necessary, with Emergency Operations Facility (EOF) using the GSEP phone.
 - e. State updates are required at the Alert or higher classification. These updates are required at the top of the second hour following the classification. STATE updates are the responsibility of the EOF. Personnel responsible for making state updates are:

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 the updates are being made by the EOF. If the EOF cannot complete this task, the responsibility reverts back to the TSC. Assist the MEO in the acquisition of information for state agency updates.

- F. 6. As necessary, RECORD and RELAY inquiries to the Station Director. Additionally, RECORD responses to such inquiries prior to transmission.
- 7. ACT as the Com Ed liaison to any NRC Site Team Representatives. ENSURE that NRC Site Team personnel are directed to their appropriate counter parts.
- 8. ASSIST the Station Director in maintaining proper records.
- 9. MAINTAIN a record of GSEP related activities.
- 10. REFER to the Assistant Station Director Checklist in BwZP 2000-1A1.

G. APPENDICES

BwZP 2000-1A1, Assistant Station Director Checklist.

ADMINISTRATIVE DIRECTOR IMPLEMENTING PROCEDURE

A. PURPOSE

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

B. REFERENCES

1. Generating Station Emergency Plan (GSEP).
2. BwZP 2000-8, Technical Support Center Shift Turnover.

C. PREREQUISITES

None.

D. PRECAUTIONS

None.

E. LIMITATIONS AND ACTIONS

1. The Administrative Director provides administrative services, including food and lodging for station personnel, in support of emergency/recovery operations.
2. The Administrative Director reports to the Technical Support Center (TSC) unless otherwise directed by the Emergency Director.
3. The Administrative Director is supervised by the Assistant Station Director in the TSC.

F. PROCEDURE

1. ACTIVATE support personnel for Control Room and TSC and OSC. To activate personnel using the group page:
 - a. DIAL "6" to initiate the paging process.
 - b. WHEN asked to enter the pager number, ENTER "8888"/"7777".
 - c. WHEN asked to enter the message, ENTER "8888"/"7777".
2. DIRECT a staff in the processing of emergency procedures and interim reports during an emergency.
3. COORDINATE recordkeeping efforts of the Station during an emergency. This includes recording of information from the status boards for inclusion into the permanent record.
4. ASSIST the Station Director in arranging for shift relief and continual staffing of the station.
5. ARRANGE for food and sleeping facilities for onsite emergency workers.
6. As necessary, ARRANGE for clerical staff at the TSC, and OSC.
7. WHEN a Site or General Emergency is declared, CONTACT two SAMG Evaluators from the station call list to assist the Technical Director.
8. ARRANGE for specialized training of emergency response personnel as needed.
9. MAINTAIN the Significant Events Log (SEL) and Station Priorities Log (SPL) in the TSC.
10. MAINTAIN a log of all Administrative Director GSEP activities.
11. REFER to the Administrative Director Checklist provided in BwZP 2000-7A1. This checklist is provided solely for the convenience of the Administrative Director. It is not necessary to follow the checklist step-by-step. Its completion is not required and its use is determined by the Administrative Director.

G. APPENDICES

BwZP 2000-7A1, Administrative Director Checklist.

ADMINISTRATIVE DIRECTOR CHECKLIST

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

1. ACTIVATE support personnel for Control Room, TSC and OSC.

2. COORDINATE with the Station Director and Security Director to control access to the Technical Support Center (TSC). RESTRICT the number of personnel in the TSC to those with essential tasks.

3. As necessary, VERIFY two communicators are dispatched to the Operational Support Center (OSC) and three communicators are dispatched to the Control Room.

4. MAINTAIN a log of personnel utilized in the emergency, at the TSC and OSC, (word processors, telecopier operators, switchboard operators, etc.).

5. IDENTIFY staffing requirements and ENSURE an individual is available to contact relief personnel. Relief personnel should be obtained for every staffed position in the TSC, OSC and other emergency crews. Guidance for Shift relief is found in BwZP 2000-8.

6. ESTABLISH training schedules for radiation protection and security procedures, as appropriate, for specialized emergency response personnel.

ADMINISTRATIVE DIRECTOR CHECKLIST (Contd)

7. ARRANGE for food and sleeping facilities for onsite personnel as necessary.

8. As necessary, COORDINATE with the Environs Director in obtaining additional vehicles and vehicle keys to be used for environmental monitoring.

9. MAINTAIN the Significant Events Log (SEL) and Station Priorities Log (SPL) in the TSC.

10. WHEN a site or General Emergency is declared, CONTACT two SAMG Evaluators from the station call list to report to the TSC and assist the Technical Director.

11. MAINTAIN a log of all Administrative Director GSEP activities.

12. At the end of the shift, COLLECT and COMPILE all completed logs of GSEP activities. MAINTAIN a master log of the emergency event.
