Union Electric Callaway Plant

÷.

meren

PO Box 620 Fulton, MO 65251

February 5, 2001

U. S. Nuclear Regulatory Commission Attn: Document Control Desk Mail Stop P1-137 Washington, DC 20555-0001

ULNRC-4365

Gentlemen:

## EMERGENCY PREPAREDNESS RADIOLOGICAL EMERGENCY RESPONSE PLAN CALLAWAY PLANT, DOCKET NUMBER 50-483 <u>UNION ELECTRIC CO.</u>

Ref: 1) RERP Revision 023

2) RERP Change Notice 00-006

Enclosed is one copy of Change Notice 00-008 to Revision 023 of the Callaway Plant Radiological Emergency Response Plan (RERP), Attachment 1.

During Change Notice 00-006 an editorial error occurred in placing footnote symbols in EAL 1C item 2 and EAL1D item 2. The error was corrected by use of separate symbols for the two footnotes associated with these EALS. For consistency, the new footnote was added to EAL 1B item 2. Copies of the affected page of the original and revised EALs are attached for ease of understanding.

This Change Notice does not decrease the effectiveness of emergency preparedness for the Callaway Plant. The RERP continues to meet the standards of 10CFR50.47(b) and the requirements of 10CFR50.54(q).

Sincerely,

Blosser

John D. Blosser Manager, Operations Support





ULNRC-4365 February 5, 2001 Page 2

 cc: Mr. Ellis W. Merschoff (2 copies w/a) Regional Administrator
 U.S. Nuclear Regulatory Commission Region IV
 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011-8064

> Mr. Vince Gaddy (1 copy w/a) Senior Resident Inspector Callaway Resident Office U.S. Nuclear Regulatory Commission 8201 NRC Road Steedman, MO 65077

Mr. Jack N. Donohew (2 copies w/a) Licensing Project Manager, Callaway Plant Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Mail Stop 7E1 Washington, DC 20555-2738

Manager, Electric Department (1 copy w/o) Missouri Public Service Commission PO Box 360 Jefferson City, MO 65102

Mr. Paul Elkman (1 copy w/a) Senior Emergency Preparedness Analyst U. S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011-8064

Mr. Thomas A. Baxter (1 copy w/o) Shaw, Pittman, Potts & Trowbridge 2300 N. Street N.W. Washington, DC 20037

Mr. Jerry B. Uhlmann (1 copy w/o) Director Missouri State Emergency Management Agency PO Box 116 Jefferson City, MO 65102 ULNRC-4365 February 5, 2001 Page 3

۰.

Superintendent, Licensing (1 copy w/o) Wolf Creek Nuclear Operating Corporation PO Box 411 Burlington, KS 66839

.

## Table 4-1EMERGENCY ACTION LEVELS

## Group 1 ABNORMAL RADIATION EVENTS Offsite Events

UNUSUAL EVENT	ALERT	SITE EMERGENCY	GENERAL EMERGENCY
<ul> <li>A.</li> <li>Any Unplanned Release of Radioactivity to the Environment That Exceeds 2 Times the Radiological Effluent Control Limits in the ODCM, (APA-ZZ-01003) for ≥60 minutes.</li> <li>MODES: At All Times</li> <li>Indicators <ol> <li>All of the following: <ol> <li>A valid alarm and reading on any of the following effluent monitors: HB-RE-18 GT-RE-21B GH-RE-10B</li> <li>The valid reading is 2 times the Hi Hi alarm setpoint value.</li> <li>The release cannot be terminated within 60 minutes of the alarm actuation.</li> </ol> </li> <li>OR <ol> <li>Both of the following: <ol> <li>Confirmed sample analysis indicates that a release exceeding 2 times the applicable values of the ODCM (APA-ZZ-01003), has occurred.</li> <li>The release cannot be terminated within 60 minutes.</li> </ol> </li> </ol></li></ol></li></ul>	<ul> <li>B. Any Unplanned Release of Radioactivity to the Environment That Exceeds 200</li> <li>Times the Radiological Effluent Control Limits in the ODCM, (APA-ZZ-01003) for ≥15 minutes.</li> <li>MODES: At All Times</li> <li>Indicators</li> <li>a. A valid alarm and reading on any of the following effluent monitors: HB-RE-18 GT-RE-21B GH-RE-10B</li> <li>b. The valid reading is 200 times the Hi Hi alarm setpoint value.</li> <li>c. The release cannot be terminated within 15 minutes of the alarm actuation.</li> <li>OR @2. Both of the following: a. A Valid reading on any of the following monitors: AB-RE-0111 &gt;27 mrem/hr AB-RE-0112 &gt;27 mrem/hr AB-RE-0113 &gt;27 mrem/hr AB-RE-0113 &gt;27 mrem/hr B - The release cannot be terminated within 15 minutes.</li> <li>OR</li> <li>3. Both of the following: a. Confirmed sample analysis indicates that a release cannot be terminated within 15 minutes.</li> <li>OR</li> <li>OR</li> <li>Both of the following: a. Confirmed sample analysis indicates that a release cannot be terminated within 15 minutes.</li> <li>OR</li> <li>OR</li> <li>Both of the following: a. Confirmed sample analysis indicates that a release cannot be terminated within 15 minutes.</li> <li>OR</li> <li>OR</li> <li>CN 00-006 &amp; 008</li> </ul>	<ul> <li>C.</li> <li>EAB Dose Resulting From an Actual or Imminent Release of Gaseous Radioactivity Exceeds 100 mrem TEDE or 500 mrem CDE Thyroid for the Actual or Projected Duration of the Release.</li> <li>MODES: At All Times</li> <li>Indicators Any of the following: CN 00-002</li> <li>*1. A valid reading on the Unit Vent monitor, GT- RE-21B, &gt; 2.42E+8 µCi/sec for 15 minutes or longer.</li> <li>*@2. Both of the following: a. A Valid reading on any of the following monitors: AB-RE-0111 &gt;146 mrem/hr AB-RE-0113 &gt;146 mrem/hr AB-RE-0113 &gt;146 mrem/hr FC-RE-0385 &gt;850 mrem/hr</li> <li>b. The reading has been, or is expected to be, exceeded for 15 minutes or longer.</li> <li>3. A valid dose projection indicates &gt;100 mrem TEDE or &gt;500 mrem CDE thyroid dose at, or beyond, the EXCLUSION AREA BOUNDARY using in plant rad data or field monitoring team survey results.</li> <li>4. Field survey results at, or beyond, the EAB corresponding to &gt;100 mrem/hr TEDE for 1 hour (or expected to continue for 1 hour) or &gt;500 mrem/hr CDE thyroid for 1 hour of inhalation.</li> <li>*Declare the event using this indicator only if actual dose projections per Indicator 3 cannot be performed within 15 minutes of the monitors exceeding the reading. CN 00-006 &amp; 008</li> <li>@Release values based on average meteorological data and a 1 hour release duration.</li> </ul>	<ul> <li>D. EAB Dose Resulting From an Actual or Imminent Release of Gaseous Radioactivity Exceeds 1000 mrem TEDE or 5000 mrem CDE Thyroid for the Actual or Projected Duration of the Release. MODES: At All Times</li> <li>Indicators Any of the following: CN 00-002</li> <li>*1. A valid reading on the Unit Vent monitor, GT-RE-21B, &gt; 2.42E+9 µCi/sec for 15 minutes or longer.</li> <li>*@2. Both of the following: <ul> <li>a. A Valid reading on any of the following monitors: AB-RE-0111 &gt;1460 mrem/hr AB-RE-0112 &gt;1460 mrem/hr</li> <li>A B-RE-0112 &gt;1460 mrem/hr</li> <li>A B-RE-0113 &gt;1460 mrem/hr</li> <li>A B-RE-0114 &gt;1460 mrem/hr</li> <li>B - RE-0113 &gt;1460 mrem/hr</li> <li>B - RE -0114 &gt;1460 mrem/hr</li> <li>A valid dose projection indicates &gt;1000 mrem TEDE or &gt;5000 mrem CDE thyroid dose at, or beyond, the EXCLUSION AREA BOUNDARY using in plant rad data or field monitoring team survey results.</li> </ul> </li> <li>4. Field survey results at, or beyond, the EAB corresponding to &gt;1,000 mrem/hr TEDE for 1 hour (or expected to continue for 1 hour) or &gt;5,000 mrem/hr CDE thyroid for 1 hour of inhalation.</li> <li>*Declare the event using this indicator only if actual dose projections per Indicator 3 cannot be performed within 15 minutes of the monitors exceeding the reading. CN 00-006 &amp; 008</li> <li>@Release values based on average meteorological data and a 1 hour release duration.</li> </ul>

,



 Table 4-1

 EMERGENCY ACTION LEVELS

As is currently

## Group 1 ABNORMAL RADIATION EVENTS Offsite Events

<u>UNUSUAL EVENT</u>	ALERT	SITE EMERGENCY	GENERAL EMERGENCY
<ul> <li>A. Any Unplanned Release of Radioactivity to the Environment That Exceeds 2 Times the Radiological Effluent Control Limits in the ODCM, (APA-ZZ-01003) for ≥60 minutes. MODES: At All Times</li> <li>Indicators <ol> <li>All of the following: <ol> <li>A valid alarm and reading on any of the following effluent monitors: HB-RE-18 GT-RE-21B GH-RE-10B</li> <li>The valid reading is 2 times the Hi Hi alarm setpoint value.</li> <li>The release cannot be terminated within 60 minutes of the alarm actuation.</li> </ol> </li> <li><u>OR</u> <ol> <li>Both of the following:</li> <li>Confirmed sample analysis indicates that a release exceeding 2 times the applicable values of the ODCM (APA-ZZ-01003), has occurred.</li> <li>The release cannot be terminated within 60 minutes.</li> </ol> </li> </ol></li></ul>	<ul> <li>B. Any Unplanned Release of Radioactivity to the Environment That Exceeds 200 Times the Radiological Effluent Control Limits in the ODCM, (APA-ZZ-01003) for ≥15 minutes. MODES: At All Times</li> <li>Indicators</li> <li>1. All of the following: <ul> <li>a. A valid alarm and reading on any of the following effluent monitors: HB-RE-18 GT-RE-21B GH-RE-10B</li> <li>b. The valid reading is 200 times the Hi Hi alarm setpoint value.</li> <li>c. The release cannot be terminated within 15 minutes of the alarm actuation.</li> </ul> </li> <li>OR <ul> <li>**2. Both of the following:</li> <li>a. A Valid reading on any of the following monitors: AB-RE-0111 &gt;27 mrem/hr AB-RE-0112 &gt;27 mrem/hr AB-RE-0113 &gt;27 mrem/hr B-RE-0113 &gt;27 mrem/hr</li> <li>b. The release cannot be terminated within 15 minutes.</li> </ul> </li> <li>OR <ul> <li>Within 15 minutes.</li> </ul> </li> <li>OR <ul> <li>Confirmed sample analysis indicates that a release exceeding 200 times the applicable values of the ODCM (APA-ZZ-01003), has occurred.</li> <li>b. The release cannot be terminated within 15 minutes.</li> </ul> </li> <li>OR <ul> <li>Confirmed sample analysis indicates the applicable values of the ODCM (APA-ZZ-01003), has occurred.</li> <li>b. The release cannot be terminated within 15 minutes.</li> </ul> </li> <li>OR <ul> <li>Weight of the following:</li> <li>Confirmed sample analysis indicates the applicable values of the ODCM (APA-ZZ-01003), has occurred.</li> <li>The release terminated within 15 minutes.</li> </ul> </li> </ul>	<ul> <li>C. EAB Dose Resulting From an Actual or Imminent Release of Gaseous Radioactivity Exceeds 100 mrem TEDE or 500 mrem CDE Thyroid for the Actual or Projected Duration of the Release. MODES: At All Times</li> <li>Indicators Any of the following: CN 00-002</li> <li>*1. A valid reading on the Unit Vent monitor, GT RE-21B, &gt; 2.42E+8 µCi/sec for 15 minutes or lorger.</li> <li>*2. Both of the following: a A Valid reading on any of the following monitors: AB-RE-0111 &gt; 146 mrem/hr AB-RE-0113 &gt; 146 mrem/hr AB-RE-0113 &gt; 146 mrem/hr AB-RE-0113 &gt; 146 mrem/hr</li> <li>b. The reading has been, or is expected to be, exceeded for 15 minutes or longer.</li> <li>3. A valid dose projection indicates &gt;100 mrem TEDE or &gt;500 mrem CDE thyroid dose at, or beyond, the EXCLUSION AREA BOUNDARY using in plant rad data or field monitoring team survey results.</li> <li>4. Field survey results at, or beyond, the EAB corresponding to &gt;100 mrem/hr TEDE for 1 hour (or expected to continue for 1 hour) or &gt;500 mrem/hr CDE thyroid for 1 hour of inhalation.</li> <li>*Declare the event using this indicator only if actual dose projections per Indicator 3 cannot be performed within 15 minutes of the monitors exceeding the reading.</li> <li>**Release values based on average meteorological data and a 1 hour release duration.</li> </ul>	<ul> <li>D.</li> <li>EAB Dose Resulting From an Actual or Imminent Release of Gaseous Radioactivity Exceeds 1000 mrem TEDE or 5000 mrem CDE Thyroid for the Actual or Projected Duration of the Release. MODES: At All Times</li> <li>Indicators Any of the following: CN 00-002</li> <li>*1. A valid reading on the Unit Vent monitor, GT- RE-21B, &gt; 2.42E+9 µCi/sec for 15 minutes or lorger.</li> <li>*2. Both of the following: AB-RE-0111 &gt; 1460 mrem/hr AB-RE-0112 &gt; 1460 mrem/hr AB-RE-0113 &gt; 1460 mrem/hr AB-RE-0113 &gt; 1460 mrem/hr AB-RE-0113 &gt; 1460 mrem/hr B-RE-0113 &gt; 1460 mrem/hr</li> <li>6. The reading has been, or is expected to be, exceeded for 15 minutes or longer.</li> <li>3. A valid dose projection indicates &gt; 1000 mrem TEDE or &gt;5000 mrem CDE thyroid dose at, or beyond, the EXCLUSION AREA BOUNDARY using in plant rad data or field monitoring team survey results.</li> <li>4. Field survey results at, or beyond, the EAB corresponding to &gt;1,000 mrem/hr TEDE for 1 hour (or expected to continue for 1 hour) or &gt;5,000 mrem/hr CDE thyroid for 1 hour of inhalation.</li> <li>* Declare the event using this indicator only if actual dose projections per Indicator 3 cannot be performed within 15 minutes of the monitors exceeding the reading. CN 00-006</li> <li>* Release values based on average meteorological data and a 1 hour release duration.</li> </ul>

ŀ

1