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

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REVISIONS TO PLANT EMERGENCY PROCEDURES

Gentlemen:

In accordance with 10 CFR 50.54(q) and 10 CFR 50, Appendix E, Section V, Carolina Power & Light (CP&L) Company is submitting revisions to Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, plant emergency procedures. CP&L has evaluated these changes, in accordance with 10 CFR 50.54(q), and has determined that the changes do not decrease the effectiveness of the Radiological Emergency Response Plan; and the Plan, as changed, continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. A list of the revised procedures is provided in Enclosure 1. A summary of the revisions is provided in Enclosure 2. Enclosure 3 contains copies of the revised procedures.

CP&L requests that OPEP-Appendix A, "Emergency Response Resources," included as part of Enclosure 3, be withheld from public disclosure in accordance with 10 CFR 2.790(a)(6), since disclosure of this information would constitute a clearly unwarranted invasion of personal privacy.

There are no regulatory commitments being made in this submittal. Please refer any questions regarding this submittal to Mr. Michael Alford, Supervisor - Emergency Preparedness, at (910) 457-2286.

Sincerely,

David C. DiCello
Manager - Regulatory Affairs
Brunswick Steam Electric Plant

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Document Control Desk
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Enclosures:

1. Listing of Revised Plant Emergency Procedures
2. Summary of Revisions
3. Copies of Revised Procedures

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ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REVISIONS TO PLANT EMERGENCY PROCEDURES

Listing of Revised Plant Emergency Procedures

Procedure	Revision	Effective Date	Title
OPEP-02.6.21	38	03/28/01	Emergency Communicator
OPEP-02.6.27	11	03/28/01	Activation and Operation of the Emergency Operations Facility (EOF)
OPEP-03.7.6	2	03/28/01	Emergency Exposure Controls
OPEP-Appendix A	75	03/08/01	Emergency Response Resources

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2 DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62 REVISIONS TO PLANT EMERGENCY PROCEDURES

Summary of Revisions

- A. OPEP-02.6.21, "Emergency Communicator," Revision 38:
1. Revised Section 2.0 to delete the reference to BSP-41;
 2. Reworded Sections 5.1.19 and 5.1.20 to clarify group pager activation instructions;
 3. Revised Section 5.3.1 to clarify information to be provided to the NRC via the Emergency Notification System and Health Physics Network (HPN);
 4. Corrected a telephone number in Attachment 1-A, "Notification Checklist to Warning Points;"
 5. Removed a reference to FTS-2000 telephones in Attachment 3 to reflect changes to the Emergency Telecommunications System;
 6. Revised Attachment 6, "Control Room Emergency Communicator Flow Chart," to correct the flow chart processes; and
 7. Added Attachment 7, "Guide for Completion of Offsite Emergency Notification Activities," to provide additional guidance for notification activities.
- B. OPEP-02.6.27, "Activation and Operation of the Emergency Operations Facility (EOF)," Revision 11:
1. Updated the list of procedure references contained in Section 2.0;
 2. Revised Section 5.4.6 to clarify instructions for EOF clock synchronization;
 3. Revised Section 5.4.30.1 to clarify instructions for staffing the HPN Communications line;
 4. Revised Section 5.14.8 to provide additional guidance for the HPN Communicator when making NRC notifications;
 5. Revised Attachments 2, 3, 4, and 5 to reflect changes in the EOF layout; and
 6. Incorporated several editorial changes.
- C. OPEP-03.7.6, "Emergency Exposure Controls," Revision 2, removed the 25 Rem thyroid criteria for potassium iodide (KI) consideration and replaced it with consideration of the use of KI anytime radioiodine is present in a release affecting emergency workers.
- D. OPEP-Appendix A, "Emergency Response Resources," Revision 75, updated Emergency Response Organization listings.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REVISIONS TO PLANT EMERGENCY PROCEDURES

Copies of Revised Procedures



PLANT OPERATING MANUAL

VOLUME XIII

PLANT EMERGENCY PROCEDURE

UNIT
0



OPEP-02.6.21

EMERGENCY COMMUNICATOR

REVISION 38

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1.0 PURPOSE

This procedure provides instructions for notifying members of the Brunswick Nuclear Plant (BNP) Emergency Response Organization (ERO), CP&L Corporate, federal, state, and local agencies upon declaration of an emergency classification at BNP, or at the discretion of the Site Emergency Coordinator (SEC).

2.0 REFERENCES

- 2.1 NRC Violation 50-325, 324/88-37-03
- 2.2 OPEP-03.1.3, Use of Communication Equipment
- 2.3 OOI-01.07, Notifications
- 2.4 NUREG-0654 Section F
- 2.5 OPEP-Appendix A, Emergency Response Resources
- 2.6 OPEP-04.7, Brunswick Emergency Notification (Automated Telephone) System
- 2.7 10 CFR 50.47 b, 50.72 and Appendix E
- 2.8 OPEP-02.1, Initial Emergency Actions

3.0 RESPONSIBILITIES

3.1 Control Room Emergency Communicator

- 3.1.1 Transmit initial and follow-up notifications to offsite agencies, as directed by the Site Emergency Coordinator.
- 3.1.2 Initiate or verify the notification of Emergency Response Organization (ERO), as directed by the Site Emergency Coordinator.

3.2 Communications Director

Initiate accurate/timely notifications to the NRC.

3.0 RESPONSIBILITIES

3.3 ENS Communicator

Transmit information on plant conditions and activities during classified emergencies that require activation of the TSC.

3.4 Communications Manager/Assistant Communications Manager

Complete Emergency Notification Forms for initial and follow-up notifications and verify their transmittal to State, County, and other offsite agencies, in accordance with this procedure.

3.5 EOF Phone Talkers

Transmit initial and follow-up notifications to offsite agencies, as directed.

4.0 PRECAUTIONS AND LIMITATIONS

- 4.1 Regulations state that “a licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency. “This is satisfied when the event’s emergency classification level has been directly communicated to at least one of the agencies.
- 4.2 Do not complete Attachment 1 for offsite notifications. Attachment 1 is an “example” form only. Use copies of Emergency Notification Form (EM-78[R2-94]) located inside the front cover of the PEP manual at your work station.
- 4.3 Care should be exercised during the transmission of information to ensure the release of clear, concise, and accurate data.

4.0 PRECAUTIONS AND LIMITATIONS

- 4.4 If the emergency is terminated or reclassified before all contacts have been made, or if the emergency is the result of an Emergency Action Level(s) indicating a high classification (e.g., Site Area Emergency) that after a brief period is downgraded to a lower classification (e.g., Unusual Event), perform the following:
- 4.4.1 indicate the highest emergency classification attained;
 - 4.4.2 give the current status and when it was achieved; and then
 - 4.4.3 give the period of time that the higher classification existed and the mitigating conditions that caused the emergency classification to be downgraded.
- 4.5 In long lasting events caused by natural phenomena (i.e., hurricane, severe storms, earthquake), regular follow-up notifications to the State and Counties may be suspended if both the following criteria are met:
- 4.5.1 State and Counties agree to the suspension, and
 - 4.5.2 There is no significant change in plant status.
- 4.6 Ensure that offsite notifications are initiated within the following time limits, and as described in Attachment 1-A, Notification Checklist to Warning Points, and Attachment 1-B, Notification Checklist to Warning Points and EOCs.
- 4.6.1 For an emergency declaration, reclassification or event termination, initiate an Initial Notification to state and counties within 15 minutes, and notify the NRC immediately following state and counties, but no later than 60 minutes.
 - 4.6.2 Follow-up notifications to state, counties, and NRC shall be made at 60-minute intervals (timed from completion of the previous notification), or more frequently if warranted by changing conditions.
- 4.7 When the TSC and EOF are activated due to an emergency classification, the responsibility for emergency notifications is with the Site Emergency Coordinator and Emergency Response Manager. Notification to the NRC should be made using OOI-01.07, Attachment 3, Event Notification Worksheet.

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4.0 PRECAUTIONS AND LIMITATIONS

- 4.8 If the TSC or EOF is activated, American Nuclear Insurers (ANI) should be notified as soon as possible, normally within four hours of the declaration of an Alert or higher classification. If the event is terminated prior to activation of the TSC or EOF, ANI should be notified by Emergency Preparedness, as soon as practical (e.g., next working day) after an Alert or higher classification.
- 4.9 Corporate Communications must be notified of any declared emergency event, regardless of severity or duration.

5.0 INSTRUCTIONS

Check the listing below for your Emergency Response Organization (ERO) position and refer to the designated page for your tasks/responsibilities.

IF YOUR ERO POSITION IS:	THEN REFER TO PAGE:
CONTROL ROOM EMERGENCY COMMUNICATOR	7
COMMUNICATIONS DIRECTOR	13
ENS COMMUNICATOR	15
COMMUNICATIONS MANAGER/ASSISTANT COMMUNICATIONS MANAGER	17
EOF PHONE TALKERS	19

5.1 Control Room Emergency Communicator

- 5.1.1 Initiate duties of Control Room Emergency Communicator.
- 5.1.2 If necessary, request the SEC to provide additional personnel to complete the following actions.
 - 1. Obtain copies of:
 - a. Authenticator code words (located inside front cover of PEP Manuals in Control Room).
 - b. Emergency Notification Form (EM-78[R2-94]) located inside the front cover of the PEP manuals in Control Room.
 - c. Attachment 1-A, Notification Checklist to Warning Points
 - d. Attachment 1-B, Notification Checklist to Warning Points and EOCs
 - e. Attachment 4, Brunswick Emergency Notification System (BEN) Minimum Staffing Checklist
 - f. Attachment 5, Safety Parameter Display System List
 - g. OPEP-03.1.3, Use of Communication Equipment
 - h. OPEP-04.7, Brunswick Emergency Notification (Automated Telephone) System
 - i. Log Book
 - 2. Report to work area and verify operability of communications equipment (telephone, selective signaling, radio, etc...).

5.1 Control Room Emergency Communicator

- 5.1.3 Complete Emergency Notification Form (EM-78 [R2-94]), if directed. Refer to Attachment 2, Guidance for Completion of Emergency Notification Form, if necessary.

NOTE: Approval of the Emergency Notification Form and initiation of offsite notifications should not be delayed for an Initial Notification, if the information for Items 11-14 of the Emergency Notification Form is not readily available. If these items are initially omitted, a follow-up notification shall be made as soon as the information can be obtained.

- 5.1.4 Obtain SEC approval of completed Emergency Notification Form.

NOTE: Any information added to the form, or any changes, after SEC approval, must be re-submitted to the SEC for re-approval prior to transmittal offsite.

- 5.1.5 Determine method of notification to offsite agencies.
1. If notification is to State, Counties, and Coast Guard, use Selective Signaling System.
 2. If Selective Signaling System is inoperable, use alternate methods described in OPEP-03.1.3, Use of Communication Equipment, and telephone numbers provided in OPEP-Appendix A, Emergency Response Resources.

5.1 Control Room Emergency Communicator

3. If notification is to the NRC Operations Center in Washington, DC, use the Emergency Notification System (ENS) phone; if ENS is inoperable, use commercial telephone (or other alternate methods, described in OPEP-03.1.3, Use of Communication Equipment) and numbers listed on Attachment 1-A, Notification Checklist to Warning Points.

NOTE: When the State and/or County Emergency Operations Center (EOCs) are activated, they will request that notifications be transmitted directly to the EOC, rather than the Warning Points. If any EOCs contact the Control Room and are ready to receive emergency notifications, the Control Room should use Attachment 1-B, Notification Checklist to Warning Points and EOCs.

- 5.1.6 Notify State and County agencies listed on Attachment 1-A, Notification Checklist to Warning Points (or Attachment 1-B, if applicable) within the required time limits.
- 5.1.7 Transmit information to State and County Agencies using Attachment 3, Guidance for Making Notifications, as guidance.
- 5.1.8 Telecopy Emergency Notification Form to offsite agencies, using OPEP-Appendix A, Emergency Response Resources for telecopier numbers, if necessary.
- 5.1.9 Determine receipt of facsimiles of Emergency Notification Form by offsite agencies via Selective Signaling or alternate method.
- 5.1.10 Document questions from offsite agencies (other than news media) and transmit to SEC, or his designee, for response and signature.
- 5.1.11 Refer any calls from the news media to Corporate Communications, using phone numbers located in OPEP-Appendix 1, Emergency Response Resources.

NOTE: Initial NRC notification may be performed using the State/County Emergency Notification Form (EM-78[R2-94]), in order to expedite notification communications from the Control Room.

- 5.1.12 As an aid to direct communications when possible, complete OOI-01.07, Attachment 3, Event Notification Worksheet (per instructions in OOI-01.07, Notifications) for Notification to the NRC.

5.1 Control Room Emergency Communicator

- 5.1.13 Notify NRC Operations Center with initial and follow-up information within the required time limits, as described in Attachment 1-A, Notification Checklist to Warning Points (or Attachment 1-B, Notification Checklist to Warning Points and EOCs, if applicable).
- 5.1.14 Transmit emergency information to NRC Operations Center, as requested.
- 5.1.15 Use Attachment 3, Guidance for Making Notifications, as a reference during information transmittal.
- 5.1.16 Maintain open communications line with NRC, if requested.
- 5.1.17 If NRC requests an open line, notify the Shift Superintendent (SEC) that you need additional assistance for completing notifications.
- 5.1.18 Notify SEC with status of offsite notifications.
- 5.1.19 Verify activation of the Brunswick Emergency Notification System (BEN) for ERO Call-Out with the Secondary Alarm Station (SAS) operator.
- 5.1.20 If BEN is not operable, initiate a manual call-out of personnel using Attachment 4, Brunswick Emergency Notification System (BEN) Minimum Staffing Checklist, Group Page Activation instructions. OPEP-03.1.3, Use of Communication Equipment, also describes group page activation.

NOTE: The BEN System will fax a report to the Control Room fax machine approximately every five (5) minutes, and upon completion of notifying ERO on-call personnel. The BEN System report will also print on the BEN System printer located in Room 136 of the Training Building. Security may be contacted to unlock doors.

- 5.1.21 Use the faxed report and cross-reference with Attachment 4, BEN Minimum Staffing Checklist, ensuring all personnel have been notified.

5.1 Control Room Emergency Communicator

5.1.22 Perform other notifications, as directed by SEC, and verify/document call if made by another individual in Control Room.

1. If fire or rescue assistance is needed on site:
 - a. Call 911
 - b. Notify Security (x2254)
 - c. Notify Dosimetry (x2245)
 - d. Notify Fire Brigade
2. If individual is injured, contaminated, and requires offsite medical treatment (Doshier Hospital):
 - a. Call 911.
 - b. Notify Doshier Hospital (457-3800) to prepare for receipt of contaminated injured person.
 - c. Notify E&RC (x2246) to provide health physics coverage for the hospital.
 - d. Notify Fire Brigade to provide medical assistance to injured person.

5.1.23 Record all notifications to ERO and offsite agencies in log book.

NOTE: Room 136 in the TSC/EOF Training Building contains Selective Signaling, ENS, Rolm phones, and a plant PA unit; or the EOF communications area has telephones which can be used for offsite notifications. Room 128/132 of the EOF contains a remote VHF radio handset which is stored in a metal cabinet and must be plugged into Jack 11 near the north corner of the east wall.

5.1.24 In the event of a Control Room evacuation, perform the following:

1. Notify Security to open Room 122 (EOF), Room 128/132 (EOF), and Room 136 (across from the ventilation room near the double doors) of the TSC/EOF Training Building.

5.1 Control Room Emergency Communicator

2. Obtain authenticator code words located in the PEPs at the Communication Manager's work station in the EOF (Room 122).
3. Perform offsite notifications, as necessary, using instructions in OPEP-03.1.3, Use of Communication Equipment.

<p>NOTE: For an Unusual Event, Attachment 5, Safety Parameter Display System List, is optional at the request of the Site Emergency Coordinator.</p>

- 5.1.25 In the event ERFIS capability is not available in the TSC or EOF at an Alert level emergency or higher:
 1. Complete Attachment 5, Safety Parameter Display System List.
 2. Provide SPDS information to TSC and EOF personnel, as requested.
 3. Update Attachment 5, Safety Parameter Display System List as plant conditions change, or as often as directed, and transmit to TSC and EOF.
- 5.1.26 Determine activation status of TSC and EOF for turnover of offsite notification responsibilities.
 1. If the TSC and EOF activate simultaneously, transfer the responsibility for NRC notification to the TSC and transfer responsibility for the State, County, Coast Guard, INPO and ANI notification to the EOF.
 2. If the TSC activates without the EOF, transfer responsibility for all offsite notifications to the TSC Communications Director.
- 5.1.27 Transfer responsibility for offsite notifications to TSC and EOF, when directed.
 1. Provide information to TSC Communications Director and EOF Communications Manager on status of offsite notifications.
 2. Transmit all previous Emergency Notification Forms to the TSC and EOF via facsimile.

5.1 Control Room Emergency Communicator

3. Perform turnover of offsite notification responsibility to Communications Director and Communications Manager.
 4. Inform SEC that offsite notification responsibilities have been transferred to TSC and EOF.
 5. Record transfer of notifications in log book.
- 5.1.28 Transmit originals of Emergency Notification Forms and any other documentation generated during the emergency to the SEC upon termination of the emergency.

5.2 Communications Director

- 5.2.1 Determine activation status of the EOF.
1. If the TSC activates simultaneously with the EOF, the Communications Director will be responsible for only NRC notifications.
 2. If the TSC activates without the EOF, the Communications Director will be responsible for all offsite notifications, including State, County, Coast Guard, INPO and ANI which would be notified in accordance with Section 5.4 of this procedure, and the NRC.
 3. If the EOF is activated following the TSC, the Communications Director will transfer responsibility for State, County, Coast Guard, INPO, and ANI notifications to the EOF Communications Manager.

5.2 Communications Director

- 5.2.2 Verify status of NRC notifications with Control Room Emergency Communicator.
- 5.2.3 Direct ENS Communicator to complete OOI-01.07, Attachment 3, Event Notification Worksheet, for notification to the NRC.
- 5.2.4 Obtain SEC approval of completed NRC Event Notification Worksheet.
- 5.2.5 Provide approved NRC Event Notification Worksheet to ENS Communicator for transmittal to NRC.
- 5.2.6 Direct ENS Communicator to maintain open line with NRC, if requested.
- 5.2.7 Notify SEC with status of NRC notifications.
- 5.2.8 If fire or rescue assistance is needed on site, verify that 911 has been called by the Control Room. (Call 911, if requested by the Control Room.)
 - 1. If fire or rescue assistance has been requested to report to the site, notify the Security Director and the Radiological Control Director.
 - 2. If the rescue squad is called to aid a contaminated injured individual, notify Doshier Hospital to prepare for the receipt of a contaminated patient.
- 5.2.9 Ensure that personnel are available to obtain ERFIS data or that a communications link between the Control Room and TSC has been established for the transmittal of SPDS data, using Attachment 5, Safety Parameter Display System List.
- 5.2.10 Verify operability of VHF radios located in TSC Communications Room, in accordance with OPEP-03.1.3, Use of Communication Equipment.
- 5.2.11 Request that all correspondence transmitted to offsite agencies, for example, notification message forms and news releases, be telecopied to the TSC for distribution to the NRC.
- 5.2.12 Ensure that copies of all correspondence to offsite agencies are transmitted to the NRC Resident Inspector in the TSC.

5.3 ENS Communicator

- 5.3.1 Complete 00I-01.07, Attachment 3, Event Notification Worksheet, (per instructions in 00I-01.07, Notifications) for notification to the NRC.
1. Complete 00I-01.07, page 1 of Attachment 3, using assistance from the Communications Director, TSC SRO, or Control Room staff as necessary.
 2. Complete 00I-01.07, page 2 of Attachment 3, include insight if known to the following:
 - a. Is there any change to the classification of the event? If so, what is the reason?
 - b. What is the ongoing/imminent damage to the facility, including affected equipment and safety features?
 - c. Have toxic or radiological releases occurred or been projected, including changes in the release rate? If so, what is the projected onsite and offsite releases, and what is the basis of assessment?
 - d. What are the health effect/consequences to onsite/offsite people? How many onsite/offsite people are/will be affected and to what extent?
 - e. Is the event under control? When was control established or what is the planned action to bring the event under control? What is the mitigative action underway or planned?
 - f. What onsite protective measures have been taken or planned?
 - g. What offsite protective actions have been recommended to State/local officials?
 - h. What is the status of State/local/other Federal agencies responses, if known?

5.3 ENS Communicator

- i. If applicable, what is the status of public information activities, such as alarm, broadcast, or press releases? Has the JIC been activated?

<p>NOTE: The radiological information may be provided by another individual, preferably with an HP background, from the EOF over the HPN line.</p>

3. Complete OOI-01.07, page 3 of Attachment 3. Obtain assistance from Rad Controls Director to complete information on worksheet. If requested, this information should be provided over the Health Physics Network (HPN) line to the NRC.
 - a. Information expected to be provided over the HPN circuit includes radiological conditions (in-plant and off-site) and meteorological conditions, as well as their assessment of trends and need for protective measures on-site and off-site.
- 5.3.2 Submit completed NRC Event Notification Worksheet to Communications Director for SEC approval.
- 5.3.3 Notify NRC Operations Center with follow-up information within the required time limits, as described in Attachment 1-B, Notification Checklist for Warning Points and EOCs, using the ENS phone (or alternate method).
- 5.3.4 Using Attachment 3, Guidance for Making Notifications as a reference, transmit information on OOI-01.07, Attachment 3, Event Notification Worksheet, to NRC Operations Center.
- 5.3.5 If the NRC requests an open communications line, maintain an OPEN communications channel, until terminated by the NRC.
- 5.3.6 Notify the Communications Director with the status of NRC notifications.

5.4 Communications Manager/Assistant Communications Manager

5.4.1 Obtain copies of the following documents/forms:

1. Authenticator code words (located at EOF work station)
2. Emergency Notification Form (EM-78 [R2-94]) located inside the PEP manual at your work station.
3. Attachment 1-B, Notification Checklist to Warning Points and EOCs
4. OPEP-03.1.3, Use of Communication Equipment

5.4.2 Upon EOF activation and when directed by Emergency Response Manager (ERM), accept turnover of responsibility for State, County, Coast Guard, ANI, and INPO notifications from Control Room.

NOTE: Any exceptions to immediate transfer of responsibilities (delay in transfer) must be clearly communicated during the facility turnover briefing process.

1. Verify status of offsite notifications with Control Room Emergency Communicator.
2. Allow the Control Room Emergency Communicator to finish current notifications, if time is a consideration, or if in the process of making a notification.

NOTE: Offsite agency EOCs will activate at an Alert emergency classification or higher.

3. Determine from Control Room if all EOCs have been activated.
 - a. If all EOCs have been activated, discontinue notifications to Warning Points.
 - b. If all EOCs have not been activated, continue to make notifications to Warning Points and EOCs.

5.4 Communications Manager/Assistant Communications Manager

4. Obtain the Emergency Notification Form message number of the last notification transmitted and time next notification is required.

5.4.3 Complete Emergency Notification Form (EM-78 [R2-94])

1. Refer to Attachment 2, Guidance for Completion of Emergency Notification Form, as necessary.
2. Obtain radiological information from the Radiological Control Manager and plant status information from the Technical Analysis Manager, as appropriate.

NOTE: Approval of the Emergency Notification Form and initiation of offsite notifications should not be delayed for an initial notification, if the information for Items 11-14 on the Emergency Notification Form is not readily available. If these items are initially omitted, a follow-up notification shall be made as soon as the information can be obtained.

5.4.4 Obtain ERM approval of completed Emergency Notification Form.

NOTE: Any information added to the form, or changes made, after ERM approval, must be re-submitted to the ERM for re-approval prior to transmittal offsite.

5.4.5 Provide approved Emergency Notification Form to EOF Phone Talkers for transmittal offsite (State, Counties, Coast Guard, ANI and INPO), as described in Attachment 1-B, Notification Checklist to Warning Points and EOCs.

5.4.6 Notify ERM when offsite notifications are complete.

5.4.7 Ensure copies of all correspondence transmitted to offsite agencies are faxed to the NRC Resident Inspector in the TSC.

5.4.8 If fire or rescue assistance is needed onsite, verify that 911 has been called by the Control Room (Call 911, if requested by the Control Room).

5.4 Communications Manager/Assistant Communications Manager

- 5.4.9 Ensure availability to obtain ERFIS data or establish a communications link between the TSC and EOF Status Board Plotters.

5.5 EOF Phone Talkers

- 5.5.1 Obtain authenticator code words from Communications Manager.
- 5.5.2 Perform operability check of Selective Signaling, and inform offsite agencies that notifications will be made from the EOF upon activation
- 5.5.3 Review completed Emergency Notification Form for approval of ERM.

NOTE: Any information added to the form, or changes made after ERM approval, must be re-submitted to the ERM for re-approval prior to transmittal offsite.

- 5.5.4 Notify offsite agencies listed on Attachment 1-B, Notification Checklist to Warning Points and EOCs, within the required time limits.
- 5.5.5 If Selective Signaling System is inoperable for State and County notifications, use alternate methods described in OPEP-03.1.3, Use of Communications Equipment and telephone numbers provided in OPEP-Appendix A, Emergency Response Resources.
- 5.5.6 Transmit information to State and County agencies using Attachment 3, Guidance for Making Notifications, as guidance.
- 5.5.7 Telecopy the Emergency Notification Form to offsite agencies, using OPEP-Appendix A, Emergency Response Resources for telecopier numbers, if necessary.
- 5.5.8 Determine receipt of facsimiles of Emergency Notification Form by offsite agencies via Selective Signaling or alternate method.
- 5.5.9 Transmit copies of all correspondence to offsite agencies to the TSC.
- 5.5.10 Refer any calls from the news media to Corporate Communications or the Joint Information Center (JIC), as applicable. Phone numbers are located in OPEP-Appendix A, Emergency Response Resources.

5.5 EOF Phone Talkers

- 5.5.11 Document questions from offsite agencies (other than news media) and transmit to the Communications Manager for response and ERM approval.
- 5.5.12 Notify Communications Manager with status of offsite notifications.
- 5.5.13 Record offsite notifications in log book.
- 5.5.14 Perform other notifications, as directed by Communications Manager.

6.0 RECORDS

Documentation generated from implementation of this procedure should be forwarded to the Supervisor - Emergency Preparedness for submittal to Document Services for retention.

ATTACHMENT 1
Page 1 of 1

EMERGENCY NOTIFICATION

Received by: _____
Time: _____ Date: _____
Transmitted by: _____

1. THIS IS A DRILL ACTUAL EMERGENCY INITIAL FOLLOW-UP* MESSAGE # _____
2. SITE: _____ UNIT: _____ REPORTED BY: _____
3. TRANSMITTAL TIME/DATE: _____ / ____ / ____ CONFIRMATION PHONE NUMBER: _____
(Letters) mo dd yy
4. AUTHENTICATION (if required): _____
(Number) (Codeword)

5. EMERGENCY CLASSIFICATION: NOTIFICATION OF UNUSUAL EVENT ALPAC SITE AREA EMERGENCY GENERAL EMERGENCY

6. Emergency Declaration at: Termination at: TIME/DATE: _____ / ____ / ____ (If B, go to Item 16)
(Letters) mo dd yy
7. EMERGENCY DESCRIPTION/REMARKS: _____

8. PLANT CONDITION: IMPROVING STABLE DEGRADING
9. REACTOR STATUS: SHUTDOWN: TIME/DATE: _____ / ____ / ____ _____ % POWER
(Letters) mo dd yy

10. EMERGENCY RELEASE(S): NONE (GO TO ITEM 14) POTENTIAL (GO TO ITEM 14) IS OCCURRING HAS OCCURRED

- **11. TYPE OF RELEASE: EVAPORATED GROUND LEVEL
- AIRBORNE
- Time (Letters): _____ / ____ / ____ Stopped: _____ / ____ / ____
Time (Letters): _____ / ____ / ____ Stopped: _____ / ____ / ____

- **12. RELEASE MAGNITUDE: CUMULATIVE ACURIES NORMAL OPERATING LIMITS: BELOW ABOVE
- NOBLE GASES IODINES
- PARTICULATES OTHER

- **13. ESTIMATE OF PROTECTED OFFSITE DOSE: NEW UNCHANGED PROJECTION TIME: _____ (Letters)
- 1 mrem thyroid CDE mrem ESTIMATED DURATION: _____ HRS.
- SITE BOUNDARY _____
- 2 MILES _____
- 5 MILES _____
- 10 MILES _____

- **14. METEOROLOGICAL DATA:
- WIND DIRECTION (from) _____° SPEED (mph) _____ STABILITY CLASS _____ PRECIPITATION (type) _____

15. RECOMMENDED PROTECTIVE ACTIONS:

NO RECOMMENDED PROTECTIVE ACTIONS

EVACUATE _____

SHELTER IN PLACE _____

OTHER _____

16. APPROVED BY: _____ TIME/DATE: _____ / ____ / ____
(Name) (Time) (Letters) mo dd yy

* If Items 8-14 have not changed, only Items 1-7 and 13-16 are required to be completed
** Information may not be available on initial notification.

EM-78 (R2-94)

ATTACHMENT 1-A
Page 1 of 1
Notification Checklist to Warning Points

Part A:

CONTACT TIME	ORGANIZATION/INDIVIDUAL TO BE CONTACTED	PERSON CONTACTED	TIME COMPLETED
15 min	Brunswick County Warning Point (Selective Signaling 10-22 or 911 or 910-253-7490 or 910-253-7491)		
15 min	New Hanover County Warning Point (Selective Signaling 10-22 or 910-762-5228 or 910-341-4256)		
15 min	State Warning Point (Selective Signaling 10-22 or 919-733-3861 or 1-800-662-7956)		
60 min	NRC Operations Center Washington, D.C. (ENS or as backup: 301-951-0550 or 301-415-0550)		
60 min	Vice President - Brunswick Nuclear Plant (Pager - 800-331-7242 (#510353) Work - 2496/4496)		
60 min	NRC Resident Inspector - Ted Easlick Work - 2432, Home - 910-796-6777/796-6700, Pager - 910-457-1370 Eva Brown Work - 2311, Home - 910-395-4975, Pager - 910-457-1371 Eugene Guthrie Work - 2831, Home - 910-793-0597 Pager - 910-457-1372		
60 min	Site Communications or Corporate Communications Site - Work - 3113, Pager - 1-877-469-4172 Corporate - 919-546-6189		
60 min	INPO (Institute of Nuclear Power Operations) (for an Alert or Higher 800-321-0614)		
240 min	ANI (American Nuclear Insurers) (For an Alert or Higher 860-561-3433)		

R1

NOTE: Follow-up notifications shall be made at 60-minute intervals or more frequently as warranted by changing conditions. This time interval shall not exceed 60 minutes from the completion of the previous message.

Part B:

If an organization is contacted separately, record the following information:

<u>Name of Organization</u>	<u>Transmittal Time/Date</u>
_____	_____
_____	_____
_____	_____

ATTACHMENT 1-B
Page 1 of 1
Notification Checklist to Warning Points and EOCs

Part A:

CONTACT TIME	ORGANIZATION/INDIVIDUAL TO BE CONTACTED	PERSON CONTACTED	TIME COMPLETED
15 min	Brunswick County Warning Point (Selective Signaling 10-22 or 911 or 910-253-7490 or 910-253-7491 or		
15 min	Brunswick County EOC (Emergency Management) Selective Signaling 10-33 or 910-253-4377/2565 or 1-800-522-2366)		
15 min	New Hanover County Warning Point (Selective Signaling 10-22 or 910-762-5228 or 910-341-4256) or		
15 min	New Hanover County EOC (Emergency Services) (Selective Signaling 10-33 or 910-341-4300)		
15 min	State Warning Point (Selective Signaling 10-22 or 919-733-3861 or 800-662-7956)		
15 min	State EOC (once activated) Selective Signaling 10-33 or 919-733-3867)		
15 min	*Coast Guard Fort Macon Station (Selective Signaling 10-33 or 252-247-4545 or 252-247-4544)		
15 min	*Coast Guard MSO, Wilmington (Selective Signaling 10-33 or 772-2200 or 910-231-1855)		
60 min	NRC Operations Center, Washington, DC (ENS or 301-951-0550) (Verify call is made from TSC by ENS Communicator)		
60 min	INPO (Institute of Nuclear Power Operations) (for an Alert or higher 800-321-0614)		
240 min	ANI (American Nuclear Insurers) (For an Alert or higher 860-561-3433)		
*Required if any EOCs are activated.			

R1

NOTE:

1. Follow up notifications shall made at 60 minute intervals or more frequently as warranted by changing conditions. This time interval shall not exceed 60 minutes from the completion of the previous message.
2. Dial 10-44 to contact all Warning Points and all EOCs. When all EOCs have been activated, dial 10-33 to omit the Warning Points.

Part B:

If an organization is contacted separately, record the following information:

<u>Name of Organization</u>	<u>Transmittal Time/Date</u>
_____	_____
_____	_____
_____	_____

ATTACHMENT 2

Page 1 of 4

Guidance for Completion of Emergency Notification Form

LINE
NO.

INSTRUCTIONS

NOTE: Disregard "Received By" block in upper right hand corner of form. It is completed by offsite agencies upon receipt of the form.

NOTE: If notification is a "Follow-up" and conditions have not changed from preceding transmittals, complete only Lines 1-7, 15 and 16.

ALL Fill in (blacken) all blocks, as appropriate.

1 Mark "**A**" Drill or "**B**" **ACTUAL EMERGENCY**.

Mark as "**INITIAL**" - first notification following an upgrade, downgrade or termination. Note: All other messages are "**FOLLOW-UP**" until the next change in emergency classification.

Assign a numerical **MESSAGE NUMBER**. Note: The first notification message is message Number 1, and all others are numbered sequentially.

2 Mark **Site** as "Brunswick" and mark appropriate **UNIT** ("1" or "2"). If event is not unit specific, identify as "**Unit 1 and 2**".

Print the name of the person who will be reading the message to the State/Counties in the **REPORTED BY** space.

3 The **TRANSMITTAL TIME/DATE** block is not filled out at this time. Complete (in military time) when the emergency classification has been verbally communicated to at least one(1) of the offsite agencies. **NOTE:** This is considered the official time of the initial notification 15 minute time limit. If an agency has to be contacted separately for either an Initial or Follow-up Message, then the time the last agency is contacted should be documented on Part B: Attachment 1-A or Attachment 1-B, as appropriate.

Complete **CONFIRMATION PHONE NUMBER** block with a phone number which can be dialed from offsite for verification of message authenticity.

4 Complete **AUTHENTICATION** block when the message is being transmitted. Ask the State/Counties if they want to "authenticate" the message, and request an authentication number from the State. Refer to the associated code word from the code list located in your emergency facility, and mark the block with the **word** or **N/A** if no authentication.

5 Complete block for the appropriate **EMERGENCY CLASSIFICATION**.

6 Complete Block for **EMERGENCY DECLARATION** (time for classification in Line 5) or **TERMINATION** and indicate the time of the declaration or termination in the **TIME/DATE** space. Termination messages do not require Lines 7 through 15 to be completed; however, it is advisable to describe the bases for the termination in Item 7.

ATTACHMENT 2

Page 2 of 4

Guidance for Completion of Emergency Notification Form

LINE
NO.

INSTRUCTIONS

- 7 Complete **EMERGENCY DESCRIPTION/REMARKS** section with a short narrative of the event in progress in layman's terms. **Do not** use acronyms. Include the following types of information:
- a. Description of Emergency Action Level exceeded.
 - b. BNP emergency response actions underway, for example, site evacuation.
 - c. Requests for offsite assistance, for example, ambulance or fire support.
 - d. Facility activation status, i.e., TSC, OSC, EOF, JIC.

- 8 Mark the appropriate block for the **PLANT CONDITION**.
- a. If plant conditions are improving in the direction of a lower emergency classification or termination of the event, mark "**A**" **Improving**.
 - b. If plant conditions are not degrading and the emergency is under control (Emergency core cooling systems, equipment, plans, etc,... are operating as designed; it is not imminent that the situation will worsen), mark "**B**" **Stable**.
 - c. If plant conditions continue to degrade and it is evident that the situation will worsen, a higher emergency classification is imminent, mark "**C**" **Degrading**.

- 9 Complete **REACTOR STATUS** information as follows for unit specified in Line 2. If both units, then include status of both.
- a. If reactor is shut down, mark "**A**" and indicate the time/date of shutdown.
 - b. If reactor is at power, indicate "**N/A**" or the time/date; mark "**B**" and indicate the current reactor power level.

NOTE: Information for Lines 10 - 14 may be obtained from the STA (if in the Control Room) or the Radiological Control Manager (if in the EOF).

- 10 Mark the appropriate block for **EMERGENCY RELEASE(S)** as follows:

NOTE: If "A" None or "B" Potential is marked, then Items 11 through 13 may be skipped.

- a. If a trend can be observed to predict when the final barrier to release will be breached, select "**POTENTIAL**".
- b. If there is an ongoing release which is in excess of the release occurring prior to the event, select "**IS OCCURRING**".

NOTE: If an Initial Notification and information for Lines 11 - 14 is not readily available, it may be omitted so the notification is not delayed. A follow-up notification shall be made after the information is obtained.

ATTACHMENT 2
Page 3 of 4
Guidance for Completion of Emergency Notification Form

LINE
NO.

INSTRUCTIONS

- 11 Mark the appropriate box for **“TYPE OF RELEASE”** as follows:
- a. If release is from the stack, mark **“ELEVATED”**.
 - b. If release is from a location other than the stack, or if release is airborne and the location is unknown, mark **“GROUND LEVEL”**.
 - c. Record date, start and stop times.
- 12 Complete **RELEASE MAGNITUDE** block as follows:
- a. Record release magnitude in **“CURIES”**.
 - b. Indicate if release is above or below normal technical specification limits by selecting the applicable box beside **“NORMAL OPERATING LIMITS”**.
 - c. Using the dose projection output, enter the Xe-133 dose equivalent for **“NOBLE GASSES”** (Box A) and I-131 (CDE) dose equivalent for **“IODINES”** (Box B).
 - d. Mark **“N/A”** for **“PARTICULATES”** Box C and **“OTHER”** (Box D).
- 13 Complete **ESTIMATE OF PROJECTED OFFSITE DOSE** information as follows:
- a. Identify type of projection by marking block for **“NEW”** or **“UNCHANGED”**.
 - b. Record the time dose projection data was collected in space marked **“PROJECTION TIME”** from CP&L dose.
 - c. Record the duration of the release from CPL dose in space marked **“ESTIMATED DURATION”**.
 - d. Complete dose projection data in columns, ensuring units are in “mrem”.
- 14 Access information from ERFIS, National Weather Service or a meteorological service provider (see OPEP- Appendix A for telephone numbers) to complete **“METEOROLOGICAL DATA”** information as follows:
- a. Mark Box A **“WIND DIRECTION”** and Box B **“SPEED”**. Note: Wind direction must be “from”.
 - b. Complete Box C **“STABILITY CLASS”** and Box D **“PRECIPITATION”**.

ATTACHMENT 2

Page 4 of 4

Guidance for Completion of Emergency Notification Form

- 15 Mark appropriate box for “**RECOMMENDED PROTECTIVE ACTIONS**” determined from OPEP-02.6.28, Offsite Protective Action Recommendations as follows:
- a. Mark Box A “**NO RECOMMENDED PROTECTIVE ACTIONS**” for Unusual Event, Alert, and Site Area Emergency classifications.
 - b. For General Emergency, mark Box B “**EVACUATE**” and/or Box C “**SHELTER IN PLACE**”; list each of the zones for which the recommendation applies (for example: A, B, C, D, etc.,...).
- 16 Obtain the signature of the Site Emergency Coordinator (if notification from the Control Room) or the Emergency Response Manager (if notification from the EOF) for the “**APPROVED BY**” section prior to transmittal of the form.

NOTE: Any change made or added between signature of the form and transmittal must be initialed by the SEC or ERM.

ATTACHMENT 3
Page 1 of 6
Guidance for Making Notifications

I. Notifications to State/County Agencies

NOTE: Initially, notifications will be made to State/County Warning Points. After State/County Emergency Operations Centers (EOCs) are activated, the EOCs are notified. As soon as one (1) EOC notifies the Control Room to receive notifications, then notifications should begin to both Warning Points, and EOCs (using 10-44 on Selective Signaling) The Coast guard should also be notified at this time. After all EOCs are activated, notifications to Warning Points should be discontinued (using 10-33).

NOTE: If Selective Signaling is inoperable, alternate methods are described in OPEP-03.1.3, Use of Communication Equipment, and numbers are provided in OPEP - Appendix A, Emergency Response Resources. If AT&T Alliance Dial-Out and Rolm phones are also inoperable, VHF radio should be used and New Hanover County should be requested to contact the Coast Guard.

1. Using Selective Signaling, dial "10" and listen for a tone. At the tone, perform the following, as appropriate:
 - a. Dial **22** to contact Warning Points;
OR
 - b. Dial **44** to contact all Warning Points and EOCs;
OR
 - c. Dial **33** if State/County EOCs have all been activated.
2. As each agency picks up, wait for the initial response and say: "This is the Brunswick Nuclear Plant, Stand By".
3. After the responses stop, say: "This is the Brunswick Nuclear Plant. Answer to roll-call". (Pause).

ATTACHMENT 3

Page 2 of 6

Guidance for Making Notifications

4. If one or more organizations did not respond to roll call, perform the following, as applicable:
- a. Direct those locations already on the line to stand by and use an alternate method to contact the missing location(s) to deliver the message simultaneously.

OR

- b. Notify those already on the line that you are going to re-dial; re-enter the appropriate two-digit number from Step 1; and repeat roll-call for missing location(s).

OR

- c. If an organization(s) still does not respond, request assistance in contacting missing location(s) via alternate communications method; direct the individual to read message and record names/times on Attachment 1-A or Attachment 1-B, as appropriate.

5. Continue on with locations who are on the line.

6. Say, **"This is the Brunswick Nuclear Plant. A (state the emergency classification level)"**

- For initial notifications: **"has been declared"**.
- For follow-up notifications: **"continues to be in effect"**.

7. Record the current time and date on Line 3 of the Emergency Notification Form (Transmittal Time/Date block).

NOTE: When the emergency classification level has been directly communicated to at least one of the offsite agencies, the Initial notification 15-minute time limit has been satisfied. If an agency has to be contacted separately for either an Initial or Follow-up message, then the time the last agency is contacted should be documented on Part B: Attachment 1-A or Attachment 1-B, as appropriate.

8. Request each agency to get a copy of the Emergency Notification Form and say, "record the following information on the form".

ATTACHMENT 3

Page 3 of 6

Guidance for Making Notifications

9. Transmit information on the Emergency Notification Form to State/counties.
 - a. Read off information by line number.
 - b. Spell difficult words, as appropriate.
10. Record your name on Line 2 ("Reported By" block).
11. Record a phone number for call-back on Line 3 ("Confirmation Phone Number" block). Use an unrestricted (direct dial-in) line for call-back.
12. Ask the State if "Authentication" is required. If authentication is desired, request the State to supply the authentication number, and respond with the associated code word from the code list.
13. Record authentication information, or "N/A" (if not performed) on Line 4.
14. If you are in the middle of a transmittal, and a change in classification occurs, perform the following as appropriate:
 - a. If a **higher** classification form is provided:
 - Suspend transmittal of the lower classification.
 - Tell offsite agencies to stand-by for a classification upgrade.
 - Transmit the higher classification verbally, and fax the lower classification form to agencies.

OR

- b. If a **lower** classification form is provided:
 - Complete transmittal in progress.
 - Tell offsite agencies to stand-by for classification downgrade.
15. After notification message has been transmitted, request the State to repeat back the message, and correct any errors.
16. Request names of individuals responding, and record names in the "Person Contacted" column on Part A: Attachment 1-A or Attachment 1-B, as appropriate.

ATTACHMENT 3

Page 4 of 6

Guidance for Making Notifications

17. After notification is completed, say: "This is the end of the emergency notification. You may hang up now. This is the Brunswick Nuclear Plant out."
18. Record time notifications were completed in "Time Completed" column on Part A: Attachment 1-A or Attachment 1-B, as appropriate.
19. If one or more location(s) did not receive the notification message, repeat the above steps, as appropriate, and ensure that all State/county agencies have received the message.

NOTE: Completion time of the last notification transmittal is the start time of the 60-minute clock for follow-up notifications.

NOTE: Follow-up notifications may be telecopied, receipt verified, and any questions answered in lieu of verbal transmission

II. Notifications to NRC Operations Center

NOTE: Communications on the NRC Event Notification System are automatically recorded by the NRC.

1. Contact the NRC Headquarters Operations Officer at the NRC Incident Response Center by performing the following:
 - a. Pick up the receiver on the Emergency Notification System (ENS) Telephone.
 - b. Dial the NRC Headquarters Operations Officer via one of the numbers listed on the phone.
 - c. If the ENS phone is not operable, use a normal telephone line to contact the NRC Incident Response Center. The numbers are listed in OPEP-Appendix A, Emergency Response Resources.

ATTACHMENT 3

Page 5 of 6

Guidance for Making Notifications

2. When the Headquarters Operations Officer responds, say: "This is the Brunswick Nuclear Plant".
 - a. If applicable, also say, "THIS IS AN EXERCISE/DRILL MESSAGE".
Read the message.

NOTE: Initial NRC notification may be performed using the State/County Emergency Notification Form, in order to expedite notification communications from the Control Room.

- b. Transmit the information on the NRC Event Notification Worksheet (OOI-01.07, Attachment 3) over the telephone to the Headquarters Operations Officer.

NOTE: For classifications above Unusual Event, the Headquarters Operations Officer will be attempting to patch the Region II Administrator and other Region II personnel into the call concurrent with recording your message. You may be interrupted by patch-ins and/or requested to repeat information, and you should comply with these requests. If the Regional Administrator or his Deputy have not been patched in by the time you have completed your message, the Headquarters Operations Officer will probably request additional information.

3. Respond to any request for additional information that you can answer; otherwise, state that the information is not yet available and will be provided in a follow-up message. Note: Record any such requests and forward them to the SEC.
4. Record the name of the individuals contacted and time of contact on Attachment 1-A, Notification Checklist to Warning Points or Attachment 1-B, Notification Checklist to Warning Points and EOCs, as appropriate.
5. If you are in the Main Control Room, tell the NRC you are signing off. If requested to maintain an open communications line, notify the SEC to see if he wishes to replace you, or take other action.

ATTACHMENT 3

Page 6 of 6

Guidance for Making Notifications

6. If an open communications channel with the NRC has been established, routine use of the form is not required, provided:
- a. Verified changes in plant/equipment status are communicated to the NRC verbally.

AND

- b. A summary of the communications with the NRC is maintained in a log.

ATTACHMENT 4

Page 1 of 1

Brunswick Emergency Notification System (BEN) Minimum Staffing Checklist

ERO Position	Person Contacted	Time Contacted
TSC and OSC	X X X X X X X X X	X X X X X
Site Emergency Coordinator		
Communications Director		
Plant Operations Director		
Radiological Controls Director		
One (1) Core Thermal Hydraulics Engineer		
One (1) Mechanical Engineer		
One (1) Electrical Engineer		
Emergency Repair Director		
OSC Mission Coordinator		
E&RC Coordinator		
One (1) Chemistry Technician		
Six (6) HP Technicians		
EOF:	X X X X X X X X X	X X X X X
Emergency Response Manager		
Communications Manager		
Dose Projection Coordinator		
Radiological Controls Manager		
Four (4) Environmental Monitoring Team members		

NOTE: The following instructions are provided for manual call-out of ERO personnel.

GROUP PAGE ACTIVATION:

NOTE: If the 754 exchange is not available, the alternate number of 371-8398 should be used.

- 1) Press Group Page Number (754-1098) on Emerg Communicator Desk.
- 2) Following recording, enter Security Code 9999.
- 3) Enter call-back number and emergency codes (457-2788-x-y).

X-Code	Y-Code
0 - Unusual Event	0 - No facilities being activated
1 - Alert	1 - Activate TSC and OSC
2 - Site Area Emergency	2 - Activate TSC/OSC/EOF
3 - General Emergency	3 - Report to plant
4 - Drill	4 - Call the number displayed
- 4) Hang up telephone. Team members will begin to call 457-2788.
- 5) Call any plant personnel failing to respond or find substitute.
(See OPEP Appendix A, Emergency Response Resources.)

ATTACHMENT 5

Page 1 of 1

Safety Parameter Display System Sheet

Time _____ Unit _____ Report Number _____ Date _____

Operable Inoperable SB - StandBy Running Yes No Isolated NA - Not Available

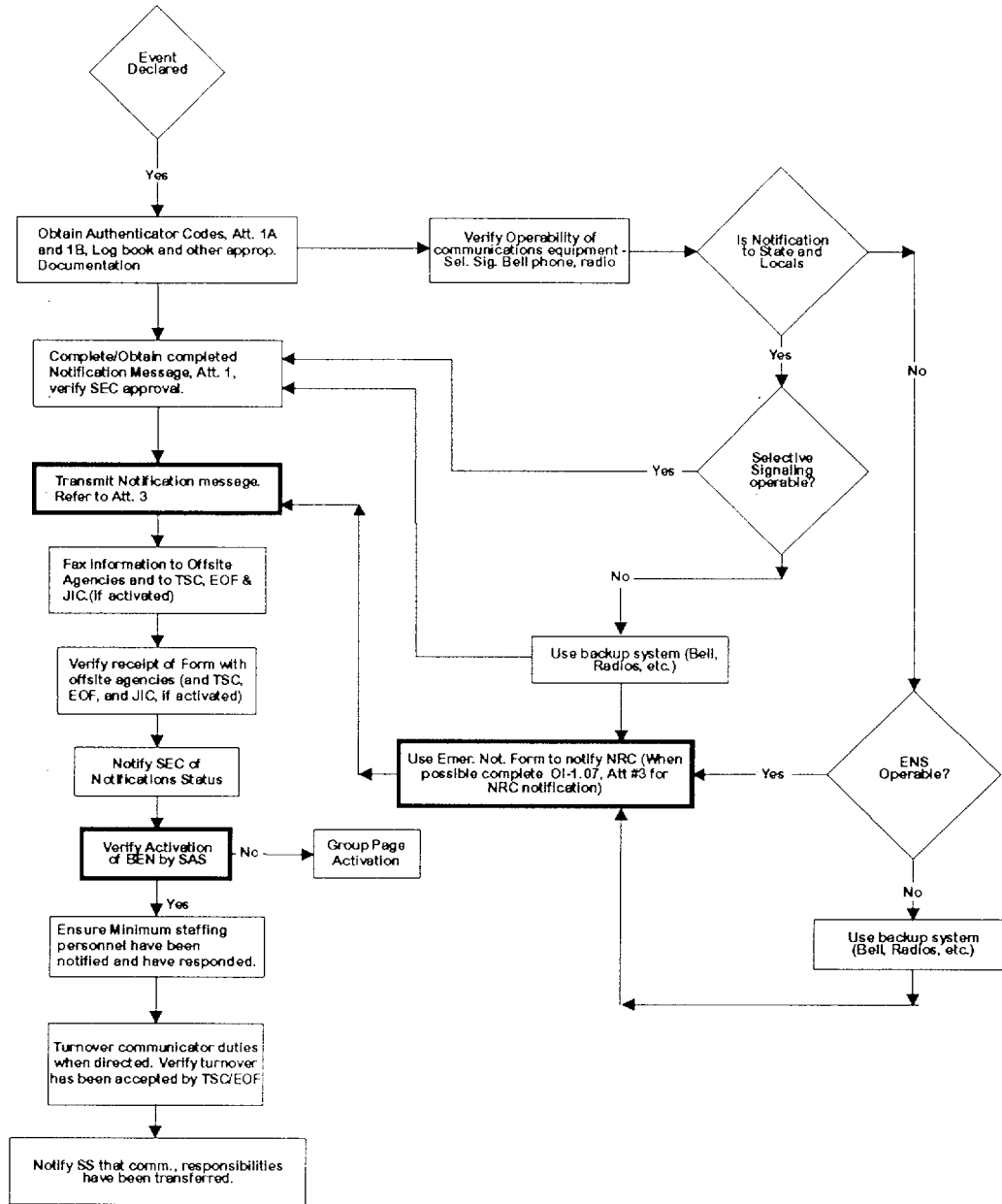
CRITICAL PLANT VARIABLES		SECONDARY CONTAINMENT INDICATORS	
1 Rx Power	(APRM%)	30 RB Negative Press	(inches of water vacuum)
2 Reactor Level	(in)	31 SGBT Flow A	(scfm)
3 Reactor Pressure	(psig)	32 SGBT Flow B	(scfm)
4 Drywell Pressure	(psig)	33 RB 80 ft Ventilation Monitor	(mR/hr)
5 Drywell Temp (Avg)	(°F)	PROCESS RAD MONITORS	
6 Suppression Pool Level	(in)	34 MSL RAD Monitor A	(mR/hr)
7 Suppression Pool Temp (Avg)	(°F)	35 MSL RAD Monitor B	(mR/hr)
8 Group 1 Isolation	(Yes/No)	36 MSL RAD Monitor C	(mR/hr)
9 Off-Site Power Available*	(Yes/No)	37 MSL RAD Monitor D	(mR/hr)
SAFETY SYSTEM STATUS		38 SJAE A	(mR/hr)
10 HPCI Flow	(kgpm)	39 SJAE B	(mR/hr)
11 RCIC Flow	(gpm)	EFFLUENT MONITORING	
12 RHR A Flow <input type="checkbox"/> LPCI <input type="checkbox"/> SDC <input type="checkbox"/> Torus Cooling	(kgpm)	40 Main Stack Flow Rate	(kscfm)
13 RHR B Flow <input type="checkbox"/> LPCI <input type="checkbox"/> SDC <input type="checkbox"/> Torus Cooling	(kgpm)	41 Main Stack Gas Monitor	(µCi/sec)
14 Core Spray A Flow	(kgpm)	42 U-1 RB Roof Vent Flow	(kscfm)
15 Core Spray B Flow	(kgpm)	43 U-1 RB Roof Vent Rad Monitor (Noble Gas)	(cpm)
16 CRD Flow	(gpm)	44 U-1 TB Roof Vent Flow	(kscfm)
17 SLC Injecting	(Yes/No)	45 U-1 TB Roof Vent Monitor	(µCi/sec)
EMERGENCY DIESEL GENERATORS		46 U-2 RB Roof Vent Flow	(kscfm)
18 EDG #1 Load	(kw)	47 U-2 RB Roof Vent Rad Monitor (Noble Gas)	(cpm)
19 EDG #2 Load	(kw)	48 U-2 TB Roof Vent Flow	(kscfm)
20 EDG #3 Load	(kw)	49 U-2 TB Roof Vent Monitor	(µCi/sec)
21 EDG #4 Load	(kw)	50 Service Water Rad Monitor	(cps)
PRIMARY CONTAINMENT INDICATORS		AREA RAD MONITORS	
22 Drywell H ₂ 4409	(% conc.)	51 RB 20 ft Airlock	(mR/hr)
23 Drywell H ₂ 4410	(% conc.)	52 RB 50 ft Sample Station	(mR/hr)
24 Drywell O ₂ 4409	(% conc.)	53 RB 50 ft Airlock S. E. Corner	(mR/hr)
25 Drywell O ₂ 4410	(% conc.)	54 RB North of Fuel Pool	(mR/hr)
DRYWELL HIGH RAD MONITORS		55 Between Fuel Pool and Drywell	(mR/hr)
26 D22-RM-4195 ~ 30 ft El.	(R/hr)	56 Turbine Bldg Sample Station*	(mR/hr)
27 D22-RM-4196 ~ 57 ft El.	(R/hr)		
28 D22-RM-4197 ~ 23 ft El.	(R/hr)		
29 D22-RM-4198 ~ 57 ft El.	(R/hr)		

*Must be obtained locally from Control Room

ATTACHMENT 6

Page 1 of 1

Control Room Emergency Communicator Flow Chart



ATTACHMENT 7

Page 1 of 1

Guide for Completion of Offsite Emergency Notification Activities

<u>Step</u>	<u>Action</u>		
1.	Obtain Attachments 1A/1B of OPEP-2.6.21.		
2.	Obtain notification form from Shift management. Ensure completion.		
3.	Using Selective Signaling, dial 10 and listen for a tone. If you hear a tone, perform the following, as appropriate: <ul style="list-style-type: none"> a. Dial 22 to contact Warning Points; b. Dial 44 to contact <u>all Warning Points and EOCs</u>; c. Dial 33 if State/County EOCs have been activated. <p>NOTE: Verify appropriate phone system (Selective signaling) is operational, if not use alternate means of notification.</p>		
4.	<u>Verbally</u> notify offsite agencies using notification form (Satisfies notification time requirement). <ul style="list-style-type: none"> • Perform Roll call (Transmittal time is "1st Contact told of Classification" time) • Request each agency to get copy of notification form. • Authenticate message if requested. 		
5.	Document the notification transmittal time (Line 3 of the form). Record notification contacts and time on Att. 1A/1B.		
6.	Verify information on form is complete prior to faxing.		
7.	Fax the form to appropriate locations Onsite & Offsite agencies (State & Counties). (This may be done in parallel with transmittal if time and resources permit.)		
8.	Contact additional individuals/agencies identified on Att. 1A/1B.		
9.	Inform SEC of notifications status.		
10.	Turnover to TSC/EOF when directed.		

For specific guidance refer to procedure PEP-2.6.21.

REVISION SUMMARY

Revision 38

- Added type of information NRC will be expecting to be provided on the ENS and HPN lines.
- Removed reference to FTS-2000 following implementation of Emergency Telecommunications System (ETS).
- Corrected phone number for Site Communications in Attachment 1-A.
- Added Attachment 7 for guidance to completion of Notification Activities.
- Corrected Attachment 6 for process errors.
- Deleted BSP-41 reference in Section 2 due to cancellation of procedure.
- Reworded Sections 5.1.19 and 5.1.20 to clarify group pager activation instructions.



PLANT OPERATING MANUAL

VOLUME XIII

PLANT EMERGENCY PROCEDURE

UNIT
0



0PEP-02.6.27

***ACTIVATION AND OPERATION OF THE EMERGENCY
OPERATIONS FACILITY (EOF)***

REVISION 11

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1.0 PURPOSE

This procedure provides instructions for activation; operation/support functions; and deactivation of the Emergency Operations Facility (EOF).

2.0 REFERENCES

- 2.1 OERP-Radiological Emergency Response Plan
- 2.2 Code of Federal Regulations 10CFR50, Appendix E
- 2.3 OPEP-02.1, Initial Emergency Actions
- 2.4 OPEP-02.1.1, Emergency Control - Notification of Unusual Event, Alert, Site Area Emergency, and General Emergency
- 2.5 OPEP-02.6.21, Emergency Communicator
- 2.6 OPEP-03.4.7, Automation of Off-Site Dose Projection Procedures
- 2.7 OPEP-03.1.3, Use of Communication Equipment
- 2.8 OPEP-03.5.5, Environmental Monitoring and Plume Tracking
- 2.9 OPEP-03.6.1, Release Estimates Based Upon Stack/Vent Readings
- 2.10 OPEP-03.7.6, Emergency Exposure Controls
- 2.11 OPEP-03.7.7, On-Site Radiological Controls
- 2.12 OPEP-02.6.28, Off-Site Protective Action Recommendations
- 2.13 OPEP-Appendix A, Emergency Response Resources
- 2.14 OPEP-03.6.3, Estimate of the Extent of Core Damage Under Accident Conditions
- 2.15 OPEP-02.6.29, Activation and Operation of the Joint Information Center (JIC)
- 2.16 OPEP-03.8.2, Personnel Accountability and Evacuation
- 2.17 Services Information Letter (SIL) No. 324, Revision 5, GE BWR Emergency Support Program

2.0 REFERENCES

- 2.18 OPEP-02.7, Recovery
- 2.19 NUREG-0654 Table B-1, Minimum Staffing Requirements
- 2.20 OPEP-02.6.20, Dose Projection Coordinator
- 2.21 OPEP-02.6.6, Environmental Monitoring Team Leader

3.0 GENERAL INFORMATION

- 3.1 The Emergency Operations Facility (EOF) is located in the Brunswick Nuclear Plant EOF/TSC/Training Building and is equipped and staffed to provide overall management of Carolina Power and Light (CP&L) emergency response, including coordination of radiological and environmental assessment; determination of protective actions for the public; and coordination of CP&L's emergency response activities with State, County and Federal agencies.
- 3.2 The EOF will be activated within 60 to 75 minutes following declaration of an Alert, Site Area Emergency, or a General Emergency, or as determined by the Site Emergency Coordinator.
- 3.3 An EOF Organization Chart is illustrated in Attachment 1.
- 3.4 Minimum staffing requirements for the EOF to be considered operational are:
 - 3.4.1 Emergency Response Manager
 - 3.4.2 Radiological Controls Manager
 - 3.4.3 Dose Projection Coordinator
 - 3.4.4 Communications Manager

Additionally, four (4) Environmental Monitoring Team members are required to augment staffing within 60-75 minutes after event declaration.

- 3.5 Upon turnover, an individual qualified for the position of Emergency Response Manager (ERM) will relieve the Site Emergency Coordinator (SEC) of responsibility for off-site notifications, dose assessment/protective action recommendations and approval of news releases.

3.0 GENERAL INFORMATION

- 3.6 As the EOF staff arrive, they are assigned tasks to provide the ERM with the information and support required to evaluate and mitigate the emergency, including:
- 3.6.1 Plant status and dynamics prior to and during the emergency.
 - 3.6.2 Performance of accident mitigation functions.
 - 3.6.3 Current status and trend of accident.
 - 3.6.4 Damage to plant systems and equipment.
 - 3.6.5 Status of emergency operations (including personnel activity in the plant).
 - 3.6.6 Magnitude of any radiological release to the environment.
 - 3.6.7 Prevailing meteorological conditions.
 - 3.6.8 Projected levels of radioactivity resulting from an airborne or waterborne release.
 - 3.6.9 Potential impact of radiological hazards on public health and safety.
 - 3.6.10 Protective Action Recommendations (PARs).
- 3.7 The layout of the EOF is illustrated in Attachments 2 through 5.

4.0 RESPONSIBILITIES

4.1 Emergency Response Manager (ERM)

NOTE: The ERM shall not delegate responsibility for approval of off-site notifications, news releases, or making off-site Protective Action Recommendations (PARs).

- 4.1.1 Provide overall site command and control of the emergency.
- 4.1.2 Provide command and control of the EOF.

4.1 Emergency Response Manager (ERM)

- 4.1.3 Approve off-site Protective Action Recommendations (PARs).
- 4.1.4 Provide recommendations to the SEC on status of the emergency for reclassification and/or termination.
- 4.1.5 Activate the Joint Information Center at the declaration of a Site Area Emergency, or higher, or as conditions warrant.
- 4.1.6 Review and approve news releases.
- 4.1.7 Review and approve notifications to off-site agencies.
- 4.1.8 Determine if recovery activities are necessary and if so, establish a Recovery Organization appropriate for the conditions. (The need for a Recovery Organization for Emergency classifications below Site Area Emergency are unlikely but should be evaluated.)

4.2 Assistant Emergency Response Manager

- 4.2.1 Provide assistance to the ERM.
- 4.2.2 Coordinate EOF support for the NRC Incident Response Team and State Representatives.
- 4.2.3 Ensure plant status updates are provided to the County EOC Representatives.
- 4.2.4 Monitor compliance with Plant Emergency Procedures (PEPs).

4.3 Technical Analysis Manager

- 4.3.1 Analyze plant parameters and system status indicators.
- 4.3.2 Evaluate emergency action level flow chart to anticipate changes in emergency classification.
- 4.3.3 Interface with off-site technical organizations, as necessary.

4.4 Radiological Controls Manager

- 4.4.1 Coordinate off-site radiological and environmental activities.

4.4 Radiological Controls Manager

- 4.4.2 Provide Protective Action Recommendations (PARs) to the ERM.
- 4.4.3 Coordinate activities to control radiological exposure and contamination of environmental monitoring teams.
- 4.4.4 Ensure accurate radiological and meteorological information is provided for Emergency Notification Forms.
- 4.4.5 Ensure that a comparison of off-site monitoring results and dose projections is performed.
- 4.4.6 Provide radiological information to the NRC, as requested.

4.5 Dose Projection Coordinator

- 4.5.1 Perform dose projections/assessment and provide calculations and results to the Radiological Controls Manager for protective action decision-making.
- 4.5.2 Provide meteorological data to the ERM via the Radiological Controls Manager.
- 4.5.3 Coordinate efforts with the Environmental Monitoring Team Leader for Environmental Monitoring information.

4.6 Environmental Monitoring Team Leader

- 4.6.1 Provide technical and administrative direction to Environmental Monitoring teams during an emergency.
- 4.6.2 Monitor, track, and record radiological exposures of environmental monitoring team members.
- 4.6.3 Provide environmental monitoring team field measurement information to the Dose Projection Coordinator and the Radiological Controls Manager.

4.7 EOF Senior Reactor Operator (SRO)

- 4.7.1 Evaluate plant data for trends/changes and impact on emergency classification and Protective Action Recommendations (PARs).
- 4.7.2 Provide information to EOF staff regarding plant conditions and operational manipulations which could affect emergency activities.

4.8 Administrative and Logistics Manager

- 4.8.1 Ensure the EOF is properly set up and maintained.
- 4.8.2 Coordinate security for the facility, including access coordination and fitness for duty.
- 4.8.3 Direct administrative services for the Emergency Response Organization (ERO).
- 4.8.4 Ensure communications equipment is maintained and operable.
- 4.8.5 Coordinate acquisition and delivery of materials, equipment and personnel from on-site and off-site resources.
- 4.8.6 Coordinate logistics support of personnel responding from off-site.
- 4.8.7 Ensure the emergency response facilities are properly staffed and scheduled for 24 hour coverage while activated.

4.9 Communications Manager/Assistant Communications Manager

- 4.9.1 Coordinate activities of the communications staff.
- 4.9.2 Ensure that accurate and timely emergency notifications are made to State and County agencies in accordance with OPEP-02.6.21.
- 4.9.3 Coordinate requests for information from State and County agencies.
- 4.9.4 Provide assistance to Public Information Communicator.

4.10 EOF Phone Talkers

- 4.10.1 Perform initial and follow-up notifications to State and counties, as directed by the Communications Manager.
- 4.10.2 Maintain Emergency Notification Forms for notifications to off-site agencies.

4.11 EOF Status Board Plotter

Maintain the EOF status boards with current and accurate emergency information.

4.12 Public Information Communicator

- 4.12.1 Develop technical news releases for the media and general public and transmit to CP&L Corporate Communications or the Joint Information Center (JIC), as applicable.
- 4.12.2 Provide emergency information updates to CP&L Corporate Communications or the JIC.

4.13 ERFIS Operator

- 4.13.1 Operate ERFIS terminal for access to plant parameter information.
- 4.13.2 Provide plant data printouts and trend information for EOF personnel, as directed.

4.14 EOF Administrative and Clerical Staff

Maintain documentation of events during the emergency and provide clerical support, as directed.

4.15 County Emergency Operations Center (EOC) Representative

Provide liaison between plant (EOF) and Brunswick and New Hanover County EOC personnel to clarify information/questions on plant status and emergency conditions.

4.16 Emergency Switchboard Operator

Operate the emergency switchboard console to handle incoming calls during an emergency.

4.17 EOF Health Physics Network (HPN) Communicator

Provide radiological information to NRC Operations Center.

4.18 Emergency Preparedness Representative

Provide emergency response support to EOF staff, as required.

5.0 INSTRUCTIONS

Check the listing below for your Emergency Response Organization (ERO) position and refer to the designated page or procedure for your tasks/responsibilities:

IF YOUR ERO POSITION IS:	THEN REFER TO:
EMERGENCY RESPONSE MANAGER (ERM)	13
ASSISTANT EMERGENCY RESPONSE MANAGER	18
TECHNICAL ANALYSIS MANAGER	21
RADIOLOGICAL CONTROLS MANAGER	24
DOSE PROJECTION COORDINATOR	OPEP-02.6.20
ENVIRONMENTAL MONITORING TEAM LEADER	OPEP-02.6.6
EOF SENIOR REACTOR OPERATOR (SRO)	28
ADMINISTRATIVE AND LOGISTICS MANAGER	30
EOF PHONE TALKER(S)	36
EOF STATUS BOARD PLOTTER	37
PUBLIC INFORMATION COMMUNICATOR	39
ERFIS OPERATOR	41
EOF ADMINISTRATIVE AND CLERICAL STAFF	43
COUNTY EMERGENCY OPERATIONS CENTER (EOC) REPRESENTATIVE	44
EMERGENCY SWITCHBOARD OPERATOR	45
EOF HEALTH PHYSICS NETWORK (HPN) COMMUNICATOR	47
EMERGENCY PREPAREDNESS REPRESENTATIVE	48
COMMUNICATIONS MANAGER/ASSISTANT COMMUNICATIONS MANAGER	50

5.1 Emergency Response Manager (ERM)

ACTIVATION:

- 5.1.1 Sign in to facility on EOF Organization Board.
- 5.1.2 Obtain designated reference materials (procedures, logbook, supplies).
- 5.1.3 Initiate documentation of activities in logbook.
- 5.1.4 Determine availability of personnel and readiness of EOF staff to declare EOF operational.

NOTE: EOF may be declared operational when the following personnel are available for minimum staffing:

- **Emergency Response Manager**
- **Radiological Controls Manager**
- **Dose Projection Coordinator**
- **Communications Manager**

Additionally, four (4) Environmental Monitoring Team members are required to augment staffing within 60-75 minutes after event declaration.

NOTE: Turnover should occur via conference call between the Control Room Shift Superintendent (SEC) and qualified individuals in the TSC and EOF assuming the SEC and ERM responsibilities.

- 5.1.5 Obtain turnover briefing on status of emergency from Site Emergency Coordinator (SEC) to include the following (see Attachment 6):
 - 1. Review emergency classification, basis for declaration and mitigating actions.
 - Cause, history, initiating events leading to emergency declaration
 - Emergency Action Levels (EALS) exceeded
 - Status of execution of steps in emergency procedures
 - Condition/stability of reactor
 - Status of fission product barriers
 - Status of safety equipment and systems
 - Present plant line-ups and plant evolutions in progress
 - Radiological Conditions
 - Corrective actions

5.1 Emergency Response Manager (ERM)

ACTIVATION:

2. Review on-site protective actions.
 - Existing hazards to personnel
 - Assembly
 - Shelter
 - Evacuations (local, Protected Area)
 - Potassium iodide (KI) administration
3. Review off-site protective actions.
 - Data on projected or actual radiological releases
 - Dose assessment
 - Protective Action Recommendations (PARs) issued to State/Counties
4. Review status of requests for off-site assistance.
 - Fire department
 - Rescue squad
 - Local law enforcement agency
 - Other
5. Review status of off-site notifications.
 - Initial/follow-up messages to State/Counties
 - NRC
 - INPO and ANI
 - Other (GE)
 - Necessary notifications not yet made
 - Communications received from State/Counties regarding activation, readiness, protective actions or requests for information
 - Time/content of any news releases or media briefings
6. Review status of augmentation of Emergency Response Organization (ERO).
 - Status of Control Room notifications to ERO
 - Status of personnel assigned to State Emergency Response Team (SERT) and/or County EOCs

5.1 Emergency Response Manager (ERM)

ACTIVATION:

7. Review status of outside organizations requested to mobilize.
 - Assistance needed
- 5.1.6 Obtain turnover of the responsibility for off-site notifications, dose assessment, protective action recommendations and approval of news releases from SEC.
 1. Ensure status of emergency is current.
 2. Accept emergency response authority from SEC.
- 5.1.7 Announce to EOF personnel that the ERM has assumed command and control of the emergency and that the EOF is operational.
- 5.1.8 Direct the AERM to notify State, counties, and CP&L Corporate that the EOF is operational.

OPERATION:

- 5.1.9 Conduct initial and periodic briefings to EOF personnel on status of emergency (approximately every 30 to 60 minutes), or significant changes using Attachment 6, "Facility Turnover/Briefing Work Sheet," as guidance.

<p>NOTE: Remind EOF staff to maintain focus on off-site issues throughout the event.</p>

- 5.1.10 Provide emergency information status to NRC representatives in EOF.
- 5.1.11 Periodically, discuss status of emergency with State representatives located in EOF.
- 5.1.12 Provide emergency classification recommendations to the SEC.
 1. Discuss plant and emergency conditions to determine if the emergency may be escalated; de-escalated or terminated.

5.1 Emergency Response Manager (ERM)

OPERATION:

NOTE: Ensure any off-site PARs for the public are completed prior to downgrading.

2. Coordinate downgrading the emergency classification with State, Counties, and NRC.

NOTE: Notification to State/Counties shall be within 15 minutes after escalation/de-escalation/termination of emergency. Status updates shall be provided at least within 60 minutes of the previous update, or sooner if conditions change.

- 5.1.13 Review/approve Emergency Notification Form for initial and follow-up notifications to the State/Counties.
- 5.1.14 Approve information for release to the media and general public through Corporate Communications or the JIC, as applicable.
- 5.1.15 Evaluate requests from Administrative & Logistics Manager for support from other facilities.
- 5.1.16 Evaluate information for Protective Action Recommendations (PARs) as required, using OPEP-02.6.28, Off-Site Protective Action Recommendations.
 1. Request updated dose projections, plant status and current PARs from Radiological Controls Manager and EOF staff.
 2. Evaluate plant conditions, dose projection calculations and off-site environmental monitoring results with Radiological Controls Manager and other EOF personnel, as appropriate.
- 5.1.17 Issue PARs to off-site agencies, as required.

5.1 Emergency Response Manager (ERM)

OPERATION:

NOTE: A PAR is mandatory at a General Emergency Classification.

- 5.1.18 Review PARs periodically, or immediately as conditions change, in accordance with OPEP-02.6.28, Off-Site Protective Action Recommendations.
- 5.1.19 Perform shift turnover to alternate ERM, as necessary.
- 5.1.20 Initiate activation of the Joint Information Center at the declaration of a Site Area Emergency, or whenever conditions warrant based on ERM judgment.
- 5.1.21 When plant conditions have stabilized such that the emergency classification will be downgraded, evaluate onsite and offsite radiological conditions to determine if Recovery activities will be necessary.

NOTE: If any area of the facility (owner controlled area) or offsite areas have been affected radiologically, a Recovery Organization should be established.

- 5.1.22 If Recovery activities are necessary, identify the composition of the Recovery Organization based on the conditions and direct its assembly.

NOTE: A Recovery Organization may (and in most cases should) be assembled prior to termination of the event and deactivation of emergency facilities. Refer to OPEP-02.7, Recovery, for specifics.

- 5.1.23 Conduct an assessment of onsite and offsite conditions concentrating primarily on the radiological conditions and any associated structural or equipment damage for briefing of the Recovery Manager.
- 5.1.24 Notify the NRC, State and local agencies that a Recovery Organization has been formed and coordinate with those agencies to provide assistance with offsite recovery activities.

5.1 Emergency Response Manager (ERM)

DEACTIVATION:

- 5.1.25 Discuss deactivation of the EOF with the SEC, off-site agencies and the NRC.
- 5.1.26 Direct EOF deactivation after concurrence of the following:
 - 1. Event is terminated.
 - 2. If Recovery efforts are necessary, a Recovery Organization is in place and the Recovery Manager formally briefed.
 - 3. Continuous dose assessment and protective action functions are no longer necessary to respond to the incident.
 - 4. The Company Spokesperson is fully briefed regarding plant status and planned recovery actions.
- 5.1.27 Direct Administrative and Logistics Manager to ensure equipment and materials are returned to their pre-activation status, if possible.
- 5.1.28 Direct Emergency Preparedness Representative to collect/transmit all documentation to Supervisor - Emergency Preparedness for post-emergency reports and submittal to Document Records.

5.2 Assistant Emergency Response Manager

ACTIVATION:

- 5.2.1 Sign in to facility on EOF Organization Board.
- 5.2.2 Obtain designated reference materials (procedures, logbook, supplies).
- 5.2.3 Verify operability of communications equipment.
- 5.2.4 Verify with the Communications Manager that on-site and off-site communications have been established with:
 - 1. TSC
 - 2. Corporate Communications/Joint Information Center

5.2 Assistant Emergency Response Manager

ACTIVATION:

3. Brunswick County Emergency Operations Center (EOC)
 4. New Hanover County Emergency Operations Center (EOC)
 5. State Emergency Operations Center (EOC)
 6. Coast Guard Marine Safety Office (EOC)
- 5.2.5 Initiate documentation of activities in logbook.
- 5.2.6 Report equipment problems to the Administrative and Logistics Manager.
- 5.2.7 Report readiness to perform emergency response function to Emergency Response Manager (ERM).

<p>NOTE: If the Emergency Response Manager has not arrived in the EOF, perform tasks in Section 5.1 pending his arrival.</p>

OPERATION:

- 5.2.8 Coordinate and acquire information for the ERM regarding current status of accident assessment, emergency classifications, corrective actions, and Protective Action Recommendations (PARs) from EOF staff.
- 5.2.9 Monitor procedure compliance by EOF personnel.
- 5.2.10 Verify status of off-site notifications with the Communications Manager.
- 5.2.11 Assist the ERM in conduct of EOF staff briefings, using Attachment 6, "Facility Turnover/Briefing Work Sheet," as guidance.
- 5.2.12 Brief EOF staff on information concerning the arrival of State Emergency Management and Radiation Protection Representatives and their function in the facility.
- 5.2.13 Establish and maintain communications with CP&L representatives at the state and county EOCs.

5.2 Assistant Emergency Response Manager

OPERATION:

- 5.2.14 Coordinate resources to address the needs of the NRC Incident Response Team and State Representatives.
- 5.2.15 Provide emergency status briefings to the State Representatives, NRC Incident Response Team, and other support personnel, (INPO, corporate) upon arrival and as appropriate.
 - 1. Use Room 128 of the Training Building for briefings, if desired.
 - 2. Provide information on current emergency status and any off-site consequences.
 - 3. Introduce personnel to EOF counterparts, as applicable.
- 5.2.16 Verify that the Public Information Communicator is monitoring plant Public Address (PA) System.
- 5.2.17 Evaluate mitigating activities for potential off-site consequences.
- 5.2.18 Monitor status boards for information accuracy and timeliness.
- 5.2.19 Provide additional assistance and support to the ERM, as requested.
- 5.2.20 Provide assistance to the ERM for Recovery planning, as requested.
- 5.2.21 Perform a formal turnover, when relieved of position responsibilities.

DEACTIVATION:

- 5.2.22 Deactivate the EOF, when directed.
 - 1. Evaluate condition of equipment and supplies.
 - 2. Report condition of equipment and supplies including deficiencies to the Administrative and Logistics Manager.

5.2 Assistant Emergency Response Manager

DEACTIVATION:

3. Restore the facility to standby readiness condition.
4. Compile logbook and any other documentation generated during the emergency for collection by the Emergency Preparedness Representative.

5.2.23 Inform off-site contacts of the deactivation (e.g., ANI or INPO.)

5.3 Technical Analysis Manager

ACTIVATION:

- 5.3.1 Sign in to facility on the EOF Organization Board.
- 5.3.2 Obtain designated reference materials (procedures, logbook, supplies).
- 5.3.3 Verify operability of communications equipment.
- 5.3.4 Establish communications with the Technical Assessment Director.
- 5.3.5 Determine status of EOF SRO and ERFIS Operator staffing.
- 5.3.6 Initiate documentation of activities in logbook.
- 5.3.7 Report equipment problems to Administrative and Logistics Manager.
- 5.3.8 Report readiness to perform emergency response function to Emergency Response Manager (ERM).

OPERATION:

- 5.3.9 Obtain briefings on emergency conditions via the Technical Assessment Director during the TSC periodic briefings.
- 5.3.10 Discuss plant status, TSC requests and other pertinent information with the EOF SRO.
- 5.3.11 Evaluate trends in plant parameters with the EOF SRO to assess plant status and severity of emergency conditions.

5.3 Technical Analysis Manager

OPERATION:

- 5.3.12 Obtain fuel core/analysis results from the Technical Assessment Director.
- 5.3.13 Provide information to the Emergency Response Manager and EOF staff regarding fuel integrity, plant systems, plant equipment and instrumentation, including projections.
- 5.3.14 Provide plant trending data; core condition/damage assessment information; and recommendations for corrective/preventive actions to the EOF staff.
- 5.3.15 Evaluate projected plant conditions and impact on emergency classification and PARs with the EOF SRO and Radiological Controls Manager.
- 5.3.16 Provide plant status information to the Public Information Communicator/Joint Information Center, if requested.
- 5.3.17 Provide information to Status Board Plotter for Equipment-Out-Of-Service Board and monitor other status boards for accurate and timely information.
- 5.3.18 Provide the technical interface with outside agencies (INPO, NRC, General Electric and other consultants), as necessary, and CP&L groups (NED, Licensing, Fuels).
- 5.3.19 Coordinate the receipt and assessment of technical information from on-site and off-site resources.
 - 1. Direct evaluation of received information by the appropriate personnel.
 - 2. Obtain and review recommendations.
 - 3. Submit recommendations to the ERM for review and approval.
- 5.3.20 Make requests for additional technical assistance and support through the Administrative and Logistics Manager.

5.3 Technical Analysis Manager

OPERATION:

NOTE: If requesting support from GE Nuclear Energy:

- a. Use the GE Emergency Contact Number located in OPEP-Appendix A, Emergency Response Resources.
- b. When the Security Dispatcher answers, give your name, phone number, name of utility, and affected unit.
- c. Request connection with the GE Emergency Support Program Duty Manager.
- d. Inform the Duty Manager if the information is for a "DRILL" or "ACTUAL EMERGENCY," and define the scope of assistance desired from GE.

5.3.21 Perform a formal turnover, when relieved of position responsibilities.

5.3.22 Provide support for Recovery operations, if directed.

5.3.23 Provide support in acquisition of resources necessary for plant stabilization, accident mitigation and recovery to normal conditions.

DEACTIVATION:

5.3.24 Deactivate the EOF, when directed.

1. Evaluate condition of equipment and supplies.
2. Report condition of equipment and supplies including deficiencies to the Administrative and Logistics Manager.
3. Restore the facility to a standby readiness condition.
4. Compile logbook and any other documentation generated during the emergency for collection by the Emergency Preparedness Representative.

5.4 Radiological Controls Manager

ACTIVATION:

- 5.4.1 Sign in to facility on the EOF Organization Board.
- 5.4.2 Obtain designated reference materials (procedures, logbook, supplies).
- 5.4.3 Verify operability of communications equipment.
- 5.4.4 Establish communications with the Radiological Controls Director.
- 5.4.5 Determine status of Dose Projection Coordinator, Environmental Monitoring Team Leader, EOF Habitability Technician and EOF HPN Communicator staffing.
- 5.4.6 Ensure time on CPL Dose computer clock is synchronized with EOF Command Room clock.
- 5.4.7 Initiate documentation of activities in logbook.
- 5.4.8 Report equipment problems to Administrative and Logistics Manager.
- 5.4.9 Report readiness to perform emergency response function to Emergency Response Manager (ERM).

OPERATION:

- 5.4.10 Provide technical assistance to the Radiological Controls Director, as required.
- 5.4.11 Direct the Dose Projection Coordinator and Environmental Monitoring Team Leader to initiate dose projection and environmental assessment activities as appropriate.
- 5.4.12 Direct the Dose Projection Coordinator and Environmental Monitoring Team Leader to maintain accurate environmental monitoring, dose assessment, and personnel dosimetry records.
- 5.4.13 Obtain information from the Radiological Controls Director on plant radiological conditions; including source term assessments, chemical and radiological data, as it becomes available.

5.4 Radiological Controls Manager

OPERATION:

- 5.4.14 Perform correlation, assessment, and prediction of current and anticipated release rates and radiation levels.
- 5.4.15 Provide assessment of radiological conditions to the Public Information Communicator, when requested.
- 5.4.16 Provide briefings to EOF personnel on status of radiological conditions, dose projections, PARs and environmental monitoring results using Attachment 7, RCM Briefing Work Sheet as guidance.
- 5.4.17 Request additional personnel, equipment, and resources through the Administrative and Logistics Manager.
- 5.4.18 Evaluate radiological releases and make recommendations to the Emergency Response Manager concerning personnel protective measures, relocation routes, etc.

<p>NOTE: At the discretion of the SEC/ERM, the TSC/EOF Emergency Ventilation System does not require emergency line-up for non-radiological events (for example, severe weather).</p>

- 5.4.19 Verify status of the TSC/EOF Emergency Ventilation System with the EOF Habitability Technician and Administrative and Logistics Manager periodically.
- 5.4.20 Initiate and maintain habitability monitoring in the EOF, in accordance with OPEP-03.7.7, On-Site Radiological Controls. If habitability survey results dictate:
 - 1. Suspend all eating, drinking, and smoking in the facility.
 - 2. Announce the suspension over the facility intercom, and repeat the announcement every 30 minutes while the ban is in effect.
 - 3. Post "No Eating, Drinking, or Smoking" signs in the facility.
 - 4. Notify the Control Room, TSC and OSC of the ban.

5.4 Radiological Controls Manager

OPERATION:

- 5.4.21 Determine personnel protective measures and dosimetry requirements for EOF staff.
- 5.4.22 Initiate issuance of dosimetry to personnel, as required.
- 5.4.23 Evaluate suspected or confirmed overexposure reports.
- 5.4.24 Initiate collection and processing of personnel dosimetry, as required.
- 5.4.25 Coordinate the monitoring and decontamination of evacuees and vehicles with the Radiological Controls Director, using OPEP-03.7.7, On-Site Radiological Controls.
- 5.4.26 Obtain update on the status of off-site monitoring and decontamination activities from the Environmental Monitoring Team Leader.
- 5.4.27 Determine if radiological conditions warrant distribution of potassium iodide (KI) using OPEP-03.7.6, Emergency Exposure Controls.
- 5.4.28 Provide the Emergency Response Manager (ERM) with recommendations on KI distribution.
- 5.4.29 Initiate distribution of KI, if required.
- 5.4.30 Assist the Communications Manager with radiological information for completion of "Emergency Notification Form".
 - 1. Obtain and assign resources as needed to staff the HPN Line to the NRC.
- 5.4.31 If conditions warrant, direct the Environmental Monitoring Team Leader to dispatch environmental monitoring teams.
- 5.4.32 Coordinate CP&L environmental monitoring and radiological assessment efforts with Federal, State and County agencies through the NRC Incident Response Team and State Representatives in the EOF.
- 5.4.33 Direct the Dose Projection Coordinator to perform dose projections and obtain off-site survey results for evaluation of Protective Action Recommendations (PARs).

5.4 Radiological Controls Manager

OPERATION:

- 5.4.34 Evaluate radiological conditions, survey results and dose projections for impact on current emergency classification.
- 5.4.35 Evaluate current and forecasted meteorological conditions and their effect on dose projections.
- 5.4.36 Develop Protective Action Recommendations (PARs) and recommendations for emergency classification upgrade using OPEP-02.6.28, Off-Site Protective Action Recommendations.
- 5.4.37 Provide dose projection results to the ERM, Communications Manager, and State Emergency Management and Radiation Protection Representatives.
- 5.4.38 Make protective measures recommendations for Environmental Monitoring Team personnel based on dose projections.
- 5.4.39 Initiate analysis of environmental TLDs.

NOTE: Evaluate placement of additional TLDs in downwind sectors off-site.

- 5.4.40 Coordinate the analysis of environmental samples for whole body counting and bio-assays of affected off-site individuals, when requested by State. (Use other CP&L facilities, when necessary.)
- 5.4.41 Monitor status boards for accurate, timely meteorological and radiological data.
- 5.4.42 Perform a formal turnover, when relieved of position responsibilities.
- 5.4.43 Provide support for Recovery operations, as directed.
- 5.4.44 Provide support in acquisition of resources necessary for plant stabilization, accident mitigation and recovery to normal conditions.

5.4 Radiological Controls Manager

DEACTIVATION:

- 5.4.45 Deactivate the EOF, when directed.
1. Evaluate condition of equipment and supplies.
 2. Report condition of equipment and supplies including deficiencies to the Administrative and Logistics Manager.
 3. Restore the facility to standby readiness condition.
 4. Compile logbook and all other documentation generated during the emergency for collection by the Emergency Preparedness Representative.

5.5 EOF Senior Reactor Operator (SRO)

ACTIVATION:

- 5.5.1 Sign in to facility on the EOF Organization Board.
- 5.5.2 Obtain designated reference materials (procedures, logbook, supplies).
- 5.5.3 Determine operability of communications equipment.
- 5.5.4 Initiate documentation of activities in logbook.
- 5.5.5 Report equipment problems to Administrative and Logistics Manager.
- 5.5.6 Report readiness to perform emergency response function to Technical Analysis Manager.

OPERATION:

- 5.5.7 Obtain information on plant status.
- 5.5.8 Obtain ERFIS plant parameters from ERFIS Operator.
- 5.5.9 Evaluate plant data for trends, changes, and impact on emergency classification.

5.5 EOF Senior Reactor Operator (SRO)

OPERATION:

- 5.5.10 Assist Technical Analysis Manager in EOF staff briefings.
- 5.5.11 Inform Technical Analysis Manager and Emergency Response Manager of any significant changes in plant status.
- 5.5.12 Provide projections of plant conditions for off-site consequences.
- 5.5.13 Postulate events causing a release of radioactive materials.
- 5.5.14 Provide information on plant status to the Public Information Communicator/Joint Information Center, as requested.
- 5.5.15 Review plant reference documentation.
- 5.5.16 Provide technical briefings to State Representatives and NRC Incident Response Team, as necessary.
- 5.5.17 Perform a formal turnover, when relieved of position responsibilities.
- 5.5.18 Evaluate criteria to terminate emergency and initiate Recovery efforts, as directed.
- 5.5.19 Provide assistance to Emergency Response Manager in development of a Recovery Plan, as necessary.

DEACTIVATION:

- 5.5.20 Deactivate the EOF, when directed.
 - 1. Evaluate condition of equipment and supplies.
 - 2. Report condition of equipment and supplies including deficiencies to the Administrative and Logistics Manager.
 - 3. Restore the facility to standby readiness condition.
 - 4. Compile logbook and any other documentation generated during the emergency for collection by the Emergency Preparedness Representative.

5.6 Administrative and Logistics Manager

ACTIVATION:

- 5.6.1 Sign in to facility on the EOF Organization Board.
- 5.6.2 Obtain designated reference materials (procedures, logbook, supplies).
- 5.6.3 Direct activation and set up of EOF, as illustrated on Attachments 2 through 5, "EOF Layout."
- 5.6.4 Direct EOF personnel to:
 - 1. Test communications equipment
 - 2. Maintain a log of activities
 - 3. Record name, date, and time on all records (trending charts, status sheets, checklists, etc.)
- 5.6.5 Synchronize EOF clocks, using the Control Room clock as official time.
- 5.6.6 Activate EOF intercom system.
 - 1. Turn on amplifier box located under the RCM workstation.
 - 2. Verify operability of the intercom system in adjoining rooms.

NOTE: At the discretion of the SEC/ERM, the TSC/EOF Emergency Ventilation System does not require emergency line-up for non-radiological events (for example, severe weather).

- 5.6.7 Discuss Emergency Ventilation System line-up with ERM. If emergency line-up is required, proceed to Step 5.6.8. If not required, skip Step 5.6.8 and proceed to Step 5.6.9.

5.6 Administrative and Logistics Manager

ACTIVATION:

- 5.6.8 Initiate (manually) the TSC/EOF Emergency Ventilation System.
1. Obtain keys to Room 134 and 165 from the storage cabinet in the EOF communications area.
 2. Proceed to Room 134.
 3. Locate "**EMERGENCY FAN TSC/EOF - Emergency Fan Unit F1**" panel.
 4. Place switch in "**HAND**" position.
 5. Verify that the **GREEN** light goes out and **RED** light comes on.
 6. Verify Damper "**2-VA-D2-D-TSC**" is **CLOSED**.
 7. Verify Damper "**2-VA-D3-D-TSC**" is **OPEN**.
 8. Proceed to Room 165 (located on the east side of the Training Building).
 9. Locate the "**Emergency Simulator Fan No. 2 - Emergency Fan Unit No. F2**" panel.
 10. Place remote switch in the "**HAND**" position.
 11. Verify that the **GREEN** light goes out and **RED** light comes on.
 12. Verify Damper "**2-VA-D8-D-TSC**" is **CLOSED**.
 13. Verify Damper "**2-VA-D6-D-TSC**" is **OPEN**.

NOTE: Filter train operation can be verified by a differential pressure indicated on the filter train gauges.

- 5.6.9 Report status of the emergency ventilation system to Radiological Controls Manager.

5.6 Administrative and Logistics Manager

ACTIVATION:

- 5.6.10 Coordinate repair or replacement of equipment and supplies as necessary.
- 5.6.11 Initiate documentation of activities in logbook.
- 5.6.12 Assign EOF Administrative and Clerical Staff, as necessary, to support EOF staff.
 - Designate one individual to maintain the ERM Logbook.
- 5.6.13 Initiate corrective actions to fill vacant positions, as necessary.
 - 1. Obtain a Brunswick Emergency Notification (BEN) System printout from the Emergency Preparedness Representative.
 - 2. Compare the printout showing personnel notified versus staffing present in facility.
 - 3. Use OPEP-Appendix A, Emergency Response Resources, to call in additional personnel, if required.
- 5.6.14 Verify operability of the Plant PA in the EOF and ensure the volume is set for audibility.

OPERATION:

- 5.6.15 Coordinate the activities of EOF Administrative and Clerical Staff.
- 5.6.16 Provide logistical support to the TSC.
- 5.6.17 Coordinate augmentation of EOF staff, as necessary, using OPEP-Appendix A, "Emergency Response Resources."

<p>NOTE: Coordinate food/lodging requirements; transportation; payroll; and communications equipment for staff augmentation.</p>

- 5.6.18 Coordinate installation, maintenance, repair or replacement of facility equipment and supplies with the appropriate departments and/or vendors.

5.6 Administrative and Logistics Manager

OPERATION:

- 5.6.19 Coordinate site access for all incoming support personnel, including non-CP&L personnel, with the TSC Security Director and the Brunswick County EOC.
- 5.6.20 Identify any special site reporting precautions for incoming personnel.

NOTE: If radiological conditions prevent access to the EOF, arrangements have been made to use the Brunswick County EOC as an assembly area for personnel until radiological conditions improve, and the site can be accessed.

- 5.6.21 Coordinate support for screening, orientation and badging of support personnel, including the NRC Incident Response Team, as necessary, with the TSC Security Director.

NOTE: Verify a team has been dispatched from the OSC to the TSC/EOF diesel generator.

- 5.6.22 Periodically request status of operability of TSC/EOF diesel generator.
- 5.6.23 Use INPO Resource Manual for material and contracting services from neighboring utilities.
- 5.6.24 Coordinate with Corporate Treasury to anticipate cash advances and expenses.

5.6 Administrative and Logistics Manager

OPERATION:

NOTE: If requesting support from GE Nuclear Energy:

- a. Use the GE Emergency Contact Number located in OPEP-Appendix A, Emergency Response Resources.
- b. When the Security Dispatcher answers, give your name, phone number, name of utility, and affected unit.
- c. Request connection with the GE Emergency Support Program Duty Manager.
- d. Inform the Duty Manager if the information is for a "DRILL" or "ACTUAL EMERGENCY," and define the scope of assistance desired from GE.

5.6.25 Notify other CP&L plants and off-site sources for support, as required.

5.6.26 Request any off-site State/County support through the State Emergency Management Representative in the EOF.

5.6.27 Coordinate legal matters and processing of claims.

5.6.28 Locate, order, stage and prepare inventories, and receive equipment and supplies.

5.6.29 Following a Site Evacuation, evaluate relocating ERO relief personnel located at the Technical Training Center to the Simulator, and coordinate activities with the Emergency Preparedness Representative.

5.6.30 Coordinate long term relief rotation for Control Room, TSC, OSC and EOF personnel.

1. Request assistance from the TSC Communications Director in determining manpower requirements for extended operations.
2. Direct EOF Administrative and Clerical Staff to assist in establishing a shift relief schedule.
3. Coordinate notification of ERO personnel for shift relief.
4. Direct shift turnover of EOF personnel, as necessary.

5.6 Administrative and Logistics Manager

OPERATION:

- 5.6.31 Perform a formal turnover, when relieved of position responsibilities.
- 5.6.32 Provide assistance to the Emergency Response Manager in development of a Recovery Plan, as necessary.
- 5.6.33 Maintain the "Event Classification Message Board", Attachment 8.

DEACTIVATION:

- 5.6.34 Deactivate the EOF, when directed.
 - 1. Direct EOF personnel to evaluate condition of equipment and supplies; report deficiencies; restore the facility to standby readiness condition; and compile documentation generated during the emergency for collection by the Emergency Preparedness Representative.
 - 2. Notify the Emergency Preparedness Representative if emergency equipment is damaged or missing.
 - 3. Return TSC/EOF Emergency Ventilation System to pre-emergency status (if applicable).
 - a. Proceed to Room 134, to "**Emergency Fan TSC/EOF - Emergency Fan Unit F1**" panel.
 - b. Switch Emergency Fan "**F-1**" to "**OFF**" position; then to "**AUTO**" position.
 - c. Verify the **RED** light goes out and **GREEN** light comes on.
 - d. Proceed to Room 165, to "**Emergency Simulator Fan No. 2 - Emergency Fan Unit No. F-2**" panel.
 - e. Perform Steps 5.6.34.3.b and 5.6.34.3.c for Emergency Fan "**F-2**".
 - 4. Shutdown the EOF intercom system.

5.7 EOF Phone Talker(s)

ACTIVATION:

- 5.7.1 Sign in to facility on the EOF Organization Board.
- 5.7.2 Obtain designated reference materials (procedures, logbook, supplies).
- 5.7.3 Prepare or set up the EOF as illustrated in Attachments 2 through 5, "EOF Layout."

ACTIVATION:

- 5.7.4 Verify operability of communications systems for notifications to State and Counties (Selective Signaling System, AT&T Alliance Dial Out System, ROLM, VHF radio and EOF facsimile), using OPEP-03.1.3, Use of Communications Equipment.
- 5.7.5 Initiate documentation of activities in logbook.
- 5.7.6 Report equipment problems to the Administrative and Logistics Manager.
- 5.7.7 Report readiness to perform emergency response function to Communications Manager.

OPERATION:

- 5.7.8 Perform notifications to State and County agencies when directed by the Communications Manager, as described in OPEP-02.6.21, Emergency Communicator.
- 5.7.9 Inform the Communications Manager on completion of all State and County notifications.
- 5.7.10 File originals of "Emergency Notification Form" for collection upon termination of emergency.
- 5.7.11 Record all notifications in logbook.

5.7 EOF Phone Talker(s)

OPERATION:

- 5.7.12 Perform other notifications, as directed by the Communications Manager.
- 5.7.13 Perform a formal turnover, when relieved of position responsibilities.

DEACTIVATION:

- 5.7.14 Deactivate the EOF, when directed.
 - 1. Evaluate condition of equipment and supplies.
 - 2. Report condition of equipment and supplies including deficiencies to the Administrative and Logistics Manager.
 - 3. Restore the facility to standby readiness condition.
 - 4. Compile logbook; originals of "Emergency Notification Form"; and all other documentation generated during the emergency for collection by the Emergency Preparedness Representative.

5.8 EOF Status Board Plotter

ACTIVATION:

- 5.8.1 Sign in to facility on the EOF Organization Board.
- 5.8.2 Obtain designated reference materials (procedures and supplies).
- 5.8.3 Prepare or set up the EOF, as illustrated in Attachments 2 through 5, "EOF Layout."
- 5.8.4 Report equipment problems and readiness to perform emergency response function to Administrative and Logistics Manager.

5.8 EOF Status Board Plotter

OPERATION:

5.8.5 Maintain status boards with current information.

NOTE: Refer to Attachment 10 for instructions describing use of EOF status board plotter headset cordless phone.

1. Obtain information from EOF personnel including:
 - Time/Event information (focusing on off-site events/response) from Communications Manager.
 - Equipment Out-of-Service information (key things happening in plant) from Technical Analysis Manager.
2. Post information on status boards with black marker.

NOTE: If the projection screen system is inoperable, post SPDS data at 15 minute intervals, or as information is made available by the ERFIS Operator or Technical Analysis Manager.

3. Analyze information for trends or out of specification values.
 4. Circle significant changes with red marker, as they occur.
 5. Update information, as conditions change.
- 5.8.6 Provide technical assistance to EOF staff, if directed.
- 5.8.7 Provide assistance in Recovery efforts, if directed.
- 5.8.8 Perform a formal turnover, when relieved of position responsibilities.

DEACTIVATION:

- 5.8.9 Deactivate the EOF, when directed.
1. Evaluate condition of equipment and supplies.
 2. Report condition of equipment and supplies including deficiencies to the Administrative and Logistics Manager.

5.8 EOF Status Board Plotter

DEACTIVATION:

3. Restore the facility to standby readiness condition.
4. Compile any documentation generated during the emergency for collection by the Emergency Preparedness Representative.

5.9 Public Information Communicator

ACTIVATION:

- 5.9.1 Sign in to facility on the EOF Organization Board.
- 5.9.2 Obtain designated reference materials (procedures, logbook, supplies).
- 5.9.3 Prepare or set up EOF, as illustrated in Attachments 2 through 5, "EOF Layout."
- 5.9.4 Verify operability of communications equipment (computer, printer, telephone).
- 5.9.5 Initiate documentation of activities in logbook.

<p>NOTE: If the JIC has not been activated, establish communications with Corporate Communications.</p>

- 5.9.6 Establish communications with the Joint Information Center (JIC).
- 5.9.7 If requested, activate the EOF to JIC intercom link, using instructions on the amplifier box located under the RCM workstation.
- 5.9.8 Report equipment problems to the Administrative and Logistics Manager and readiness to perform emergency response function to the Communications Manager.

5.9 Public Information Communicator

OPERATION:

- 5.9.9 Provide emergency information updates to Corporate Communications or the JIC Technical Specialist. Use Attachment 9, Guidance for Information Transmittal to JIC, as guidance.
- 5.9.10 Obtain information for development of technical news releases from EOF personnel.
- 5.9.11 Develop technical news releases.

NOTE: Request assistance from the Communications Manager or Asst. Comm. Manager for development of news releases.

NOTE: The ERM may give verbal approval of news release, if more timely transmittal of information is required.

- 5.9.12 Provide completed technical news releases to the Emergency Response Manager (ERM) for review and approval.
- 5.9.13 Transmit approved technical news releases to the JIC.
- 5.9.14 Forward news releases to Admin/Clerical staff member for copy/distribution to EOF staff.
- 5.9.15 Provide status of JIC events (press conferences, news media briefings) to EOF staff during briefings.
- 5.9.16 Monitor the plant Public Address (PA) system to relay significant events to EOF staff.
- 5.9.17 Perform a formal turnover, when relieved of position responsibilities.

DEACTIVATION:

- 5.9.18 Deactivate the EOF, when directed.
 - 1. Evaluate condition of equipment and supplies.
 - 2. Report condition of equipment and supplies including deficiencies to the Administrative and Logistics Manager.

5.9 Public Information Communicator

DEACTIVATION:

3. Restore the facility to standby readiness condition.
4. Compile logbook and any other documentation generated during the emergency for collection by the Emergency Preparedness Representative.
5. Shutdown the PIC computer and printer.

5.10 ERFIS Operator

ACTIVATION:

- 5.10.1 Sign in to facility on the EOF Organization Board.
- 5.10.2 Obtain designated reference materials (procedures, logbook, supplies).
- 5.10.3 Prepare or set up EOF, as illustrated in Attachments 2 through 5, "EOF Layout."
- 5.10.4 Verify operability of ERFIS terminals and other communications equipment.
- 5.10.5 Initiate documentation of activities in logbook.
- 5.10.6 Report equipment problems to Administrative and Logistics Manager and readiness to perform emergency response function to Technical Analysis Manager.

OPERATION:

- 5.10.7 Initiate steps to archive existing SPDS data.
- 5.10.8 Operate the ERFIS terminal for access to plant parameter information.
- 5.10.9 Transmit hard copy of major plant parameters for distribution to the ERM and EOF personnel about every 15 minutes, or more often, as directed by the Technical Analysis Manager. (This step is only required if video display system is not operational.)

5.10 ERFIS Operator

OPERATION:

- 5.10.10 Provide plant data printouts and trend plots for EOF personnel, as requested.
- 5.10.11 Explain operation of additional ERFIS terminals and ERFIS displays to EOF personnel, as necessary.
- 5.10.12 Monitor ERFIS for changes in information and inform EOF personnel.
- 5.10.13 Monitor ERFIS for continued operability (back-up power, temperature in computer room, etc.).
- 5.10.14 Perform a formal turnover, when relieved of position responsibilities.
- 5.10.15 Maintain historical data as necessary for Recovery.
- 5.10.16 Provide assistance in Recovery efforts, if directed.

DEACTIVATION:

- 5.10.17 Deactivate the EOF, when directed.
 - 1. Evaluate condition of equipment and supplies.
 - 2. Report condition of equipment and supplies including deficiencies to the Administrative and Logistics Manager.
 - 3. Restore the facility to standby readiness condition.
 - 4. Compile logbook and any other documentation generated during the emergency for collection by the Emergency Preparedness Representative.

5.11 EOF Administrative and Clerical Staff

ACTIVATION:

- 5.11.1 Sign in to facility on the EOF Organization Board.
- 5.11.2 Report presence to Administrative and Logistics Manager for assignment.
- 5.11.3 Prepare or set up EOF, if necessary, as illustrated in Attachments 2 through 5, "EOF Layout."
- 5.11.4 Verify operability of communications equipment.
- 5.11.5 Report equipment problems and readiness to perform emergency response function to Administrative and Logistics Manager.

OPERATION:

- 5.11.6 Obtain technical documents, procedures, drawings and other documents for EOF personnel, if requested.
- 5.11.7 Copy and distribute reference documents and other information to EOF staff, as necessary.
- 5.11.8 Provide additional office supplies to EOF staff, if requested.
- 5.11.9 Transmit facsimile information to other locations, as directed.
- 5.11.10 Maintain logbooks of EOF personnel, as assigned.
 - 1. Record time of significant events such as emergency classification changes, plant status updates, briefings and decisions made by applicable manager.
 - 2. Date and number pages.
 - 3. Initial and cross through entry errors.
- 5.11.11 Perform a formal turnover when relieved of position responsibilities.
- 5.11.12 Provide assistance in Recovery efforts, if directed.

5.11 EOF Administrative and Clerical Staff

DEACTIVATION:

- 5.11.13 Deactivate the EOF, when directed.
1. Evaluate condition of equipment and supplies.
 2. Report condition of equipment and supplies including deficiencies to the Administrative and Logistics Manager.
 3. Restore the facility to standby readiness condition.
 4. Compile documentation generated during the emergency for collection by the Emergency Preparedness Representative.

5.12 County Emergency Operations Center (EOC) Representative

ACTIVATION:

- 5.12.1 Report to the designated EOC (Brunswick or New Hanover Counties).
- 5.12.2 Report presence to County Emergency Management Director.
- 5.12.3 Obtain designated reference materials (procedures, logbook, supplies).
- 5.12.4 Establish communications with EOF Assistant Emergency Response Manager (AERM).
- 5.12.5 Initiate documentation of activities in logbook.
- 5.12.6 Report readiness to perform emergency response function to EOF Assistant Emergency Response Manager.

OPERATION:

- 5.12.7 Report status of County emergency response activities to Assistant Emergency Response Manager (AERM).
- 5.12.8 Provide advice to County Emergency Management Director and County Commissioners concerning CP&L practices, procedures and commitments.

5.12 County Emergency Operations Center (EOC) Representative

OPERATION:

- 5.12.9 Coordinate requests from County to CP&L for emergency resources through AERM.
- 5.12.10 Clarify information concerning CP&L emergency response with County personnel.
- 5.12.11 Perform a formal turnover, when relieved of position responsibilities.
- 5.12.12 Upon deactivation of EOC, compile logbook and all documentation generated during the emergency for collection by the Emergency Preparedness Representative.

5.13 Emergency Switchboard Operator

ACTIVATION:

- 5.13.1 Sign in to facility on EOF Organization Board.
- 5.13.2 Obtain designated reference materials (procedures, logbook, supplies).
- 5.13.3 Prepare, or set up EOF, as illustrated in Attachments 2 through 5, "EOF Layout".
- 5.13.4 Verify operability of emergency switchboard.
 - 1. Activate the console, as described in OPEP-03.1.3, "Use of Communications Equipment".
- 5.13.5 Initiate documentation of activities in logbook.
- 5.13.6 Report equipment problems to Administrative and Logistics Manager and readiness to perform emergency response function to Communications Manager.

5.13 Emergency Switchboard Operator

OPERATION:

- 5.13.7 Operate emergency switchboard using instructions in OPEP-03.1.3, Use of Communication Equipment.

NOTE: Transfer calls from County EOC Representatives and JIC personnel to EOF staff during facility briefings.

- 5.13.8 Answer, transfer and establish conference calls, as required.
- 5.13.9 Screen incoming calls for emergency related information.
- 5.13.10 Direct calls from media/press to the Public Information Specialists located in the Joint Information Center (JIC). Phone numbers are in plant phone book and can also be obtained from the Public Information Communicator.

NOTE: Refer to OPEP-Appendix A, Emergency Response Resources for telephone numbers of ERO personnel and emergency facilities.

- 5.13.11 Record incoming calls and information in logbook.
- 5.13.12 Perform a formal turnover, when relieved of position responsibilities.

DEACTIVATION:

- 5.13.13 Deactivate the EOF, when directed.
1. Evaluate condition of equipment and supplies.
 2. Report condition of equipment and supplies including deficiencies to the Administrative and Logistics Manager.
 3. Restore the facility to standby readiness condition.
 4. Compile logbook and any other documentation generated during the emergency for collection by the Emergency Preparedness Representative.
 5. Return switchboard to standby mode.

5.14 EOF Health Physics Network (HPN) Communicator

ACTIVATION:

- 5.14.1 Sign in to facility on EOF Organization Board.
- 5.14.2 Obtain designated reference materials (procedures, logbook, supplies).
- 5.14.3 Prepare, or set up EOF, as illustrated in Attachments 2 through 5, "EOF Layout".
- 5.14.4 Verify operability of HPN telephone for communications with the NRC Operations Center.
- 5.14.5 Initiate documentation of activities in logbook.
- 5.14.6 Report equipment problems to Administrative and Logistics Manager and readiness to perform emergency response function to Radiological Controls Manager (RCM).

OPERATION:

- 5.14.7 Initiate and maintain communications with the NRC Operations Center Protective Measures Team using the HPN telephone.

NOTE: Primary and alternate telephone numbers for the NRC are located on the HPN telephone and in OPEP Appendix A, Emergency Response Resources.

- 5.14.8 Transmit radiological information acquired from the Radiological Controls Manager and other EOF personnel to the NRC. Refer to procedure OPEP-02.6.21 Emergency Communicator, Section 5.3 for pertinent information and expectations.
- 5.14.9 Provide additional assistance, if directed.
- 5.14.10 Perform a formal turnover, when relieved of position responsibilities.

5.14 EOF Health Physics Network (HPN) Communicator

DEACTIVATION:

- 5.14.11 Deactivate the EOF, when directed.
1. Evaluate condition of equipment and supplies.
 2. Report condition of equipment and supplies including deficiencies to the Administrative and Logistics Manager.
 3. Restore the facility to standby readiness condition.
 4. Compile logbook and any other documentation generated during the emergency for collection by the Emergency Preparedness Representative.

5.15 Emergency Preparedness Representative

ACTIVATION:

- 5.15.1 Sign in to facility on the EOF Organization Board.
- 5.15.2 Obtain designated reference materials (procedures and supplies).
- 5.15.3 Prepare or set up EOF, as illustrated in Attachments 2 through 5, "EOF Layout".
- 5.15.4 Provide assistance to the EOF staff in activation of facility as needed.

OPERATION:

- 5.15.5 Monitor EOF status boards for accuracy.
- 5.15.6 Monitor procedure compliance by EOF staff.
- 5.15.7 Provide assistance to the EOF staff in emergency response activities.
- 5.15.8 Upon initiation of a Site Evacuation (automatic at a Site Area Emergency or higher), report to the Technical Training Center to coordinate the assembly of plant personnel.

5.15 Emergency Preparedness Representative

OPERATION:

- 5.15.9 Evaluate relocating ERO relief personnel from the Technical Training Center to the Simulator following the site evacuation and coordinate activities with the ALM.
- 5.15.10 Initiate the notification of JIC Facility staff at a Site Area Emergency or higher, or whenever a decision is made to activate the JIC.
- 5.15.11 Initiate activation of the JIC telephone circuits at Brunswick Community College by notifying Atlantic Telephone or Brunswick County Emergency Management (phone numbers located in OPEP-Appendix A).
 - 1. Weekdays 0800-2200, notify Atlantic Telephone
 - 2. 2200-0800, Weekends or Holidays, notify Brunswick County Emergency Management

DEACTIVATION:

- 5.15.12 Deactivate the EOF, when directed.
 - 1. Evaluate condition of equipment and supplies.
 - 2. Restore the facility to standby readiness condition.
 - 3. Notify Supervisor - Emergency Preparedness of status of emergency equipment.
 - 4. Collect logbooks and any other documentation generated during the emergency.

5.16 Communications Manager/Assistant Communications Manager

ACTIVATION:

- 5.16.1 Sign in to facility on the EOF Organization board.
- 5.16.2 Obtain designated reference materials (procedures, logbook, supplies).
- 5.16.3 Verify operability of communications equipment.
- 5.16.4 Determine status of Phone Talker, Emergency Switchboard Operator, and Public Information Communicator staffing. (Check status of personnel with Administrative and Logistics Manager.)
- 5.16.5 Ensure that an ERFIS Operator is available to obtain ERFIS data or that a communications link has been established between the EOF and TSC for SPDS data transmittal.
- 5.16.6 Initiate documentation of activities in logbook.
- 5.16.7 Report equipment problems to Administrative and Logistics Manager (ALM).
- 5.16.8 Report readiness to perform emergency response function to Emergency Response Manager (ERM).

OPERATION:

- 5.16.9 Provide direction to Phone Talkers, Emergency Switchboard Operator, and Public Information Communicator.
- 5.16.10 Direct Phone Talkers to perform Initial and Follow-up notifications, in accordance with OPEP-02.6.21, Emergency Communicator.
- 5.16.11 Perform responsibilities and tasks for offsite notifications, in accordance with OPEP-02.6.21, Emergency Communicator.
- 5.16.12 Inform EOF staff of status of offsite notifications.

5.16 Communications Manager/Assistant Communications Manager

OPERATION:

- 5.16.13 Notify Emergency Switchboard Operator when the Joint Information Center (JIC) is activated.
- 5.16.14 Provide assistance to the Public Information Communicator, as necessary.
- 5.16.15 Perform a formal turnover, when relieved of position responsibilities.
- 5.16.16 Provide support for Recovery operations, as directed.

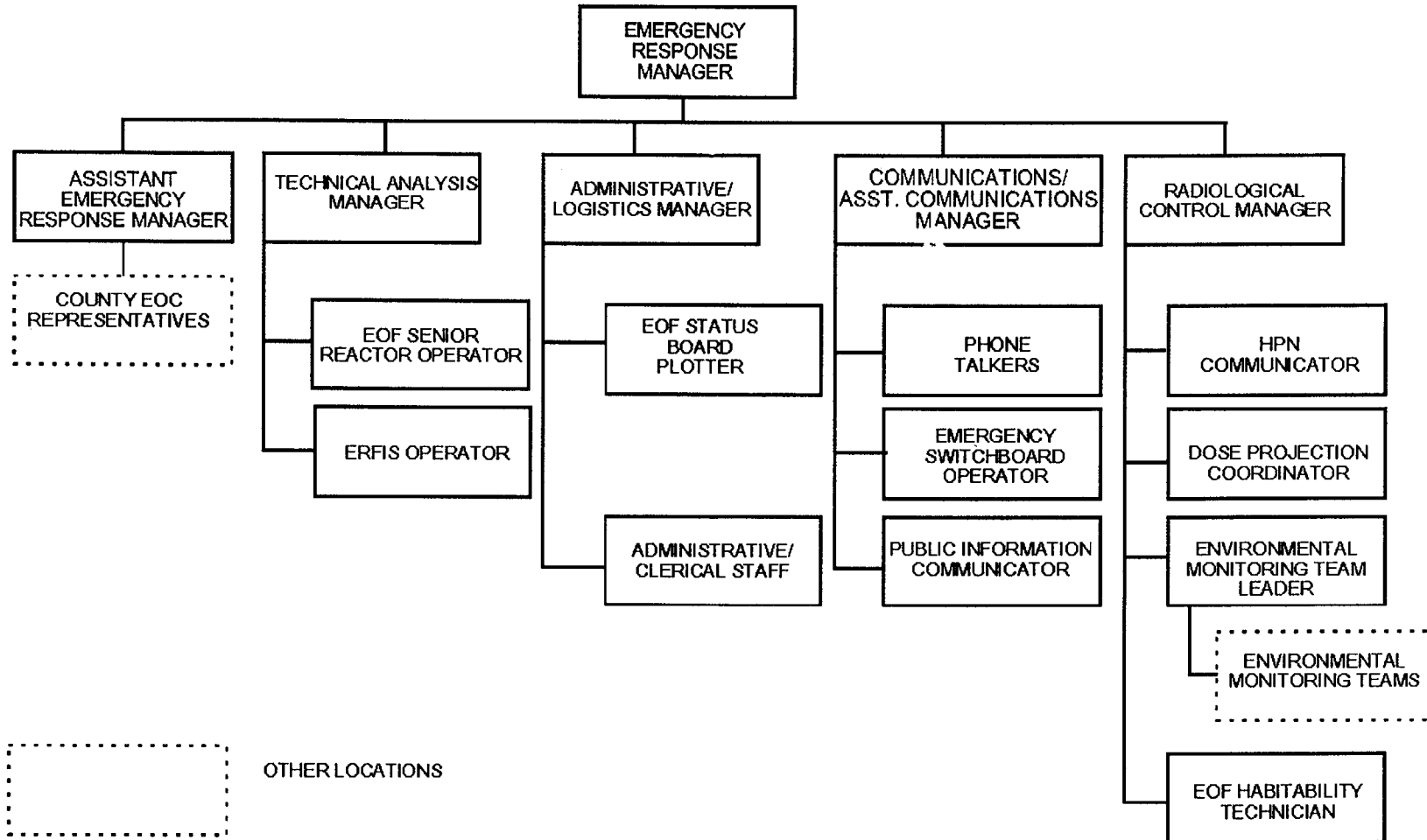
DEACTIVATION:

- 5.16.17 Deactivate the EOF, when directed.
 - 1. Evaluate condition of equipment and supplies.
 - 2. Report condition of equipment and supplies, including deficiencies, to the Administrative and Logistics Manager.
 - 3. Restore the facility to standby readiness condition.
 - 4. Compile logbook and any other documentation generated during the emergency for collection by the Emergency Preparedness Representative.

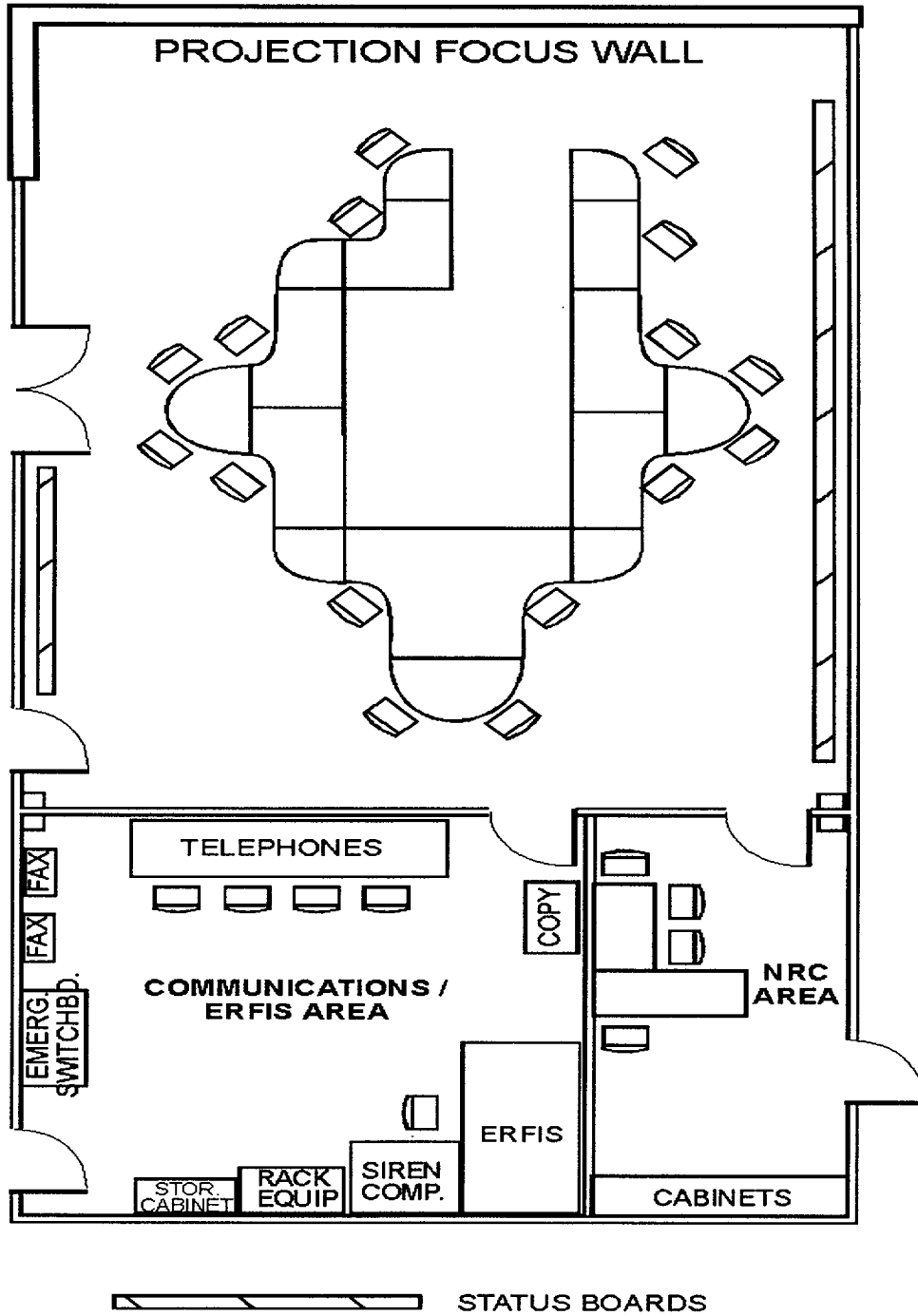
6.0 RECORDS

Documentation generated from implementation of this procedure should be forwarded to the Supervisor - Emergency Preparedness for submittal to Document Services for retention.

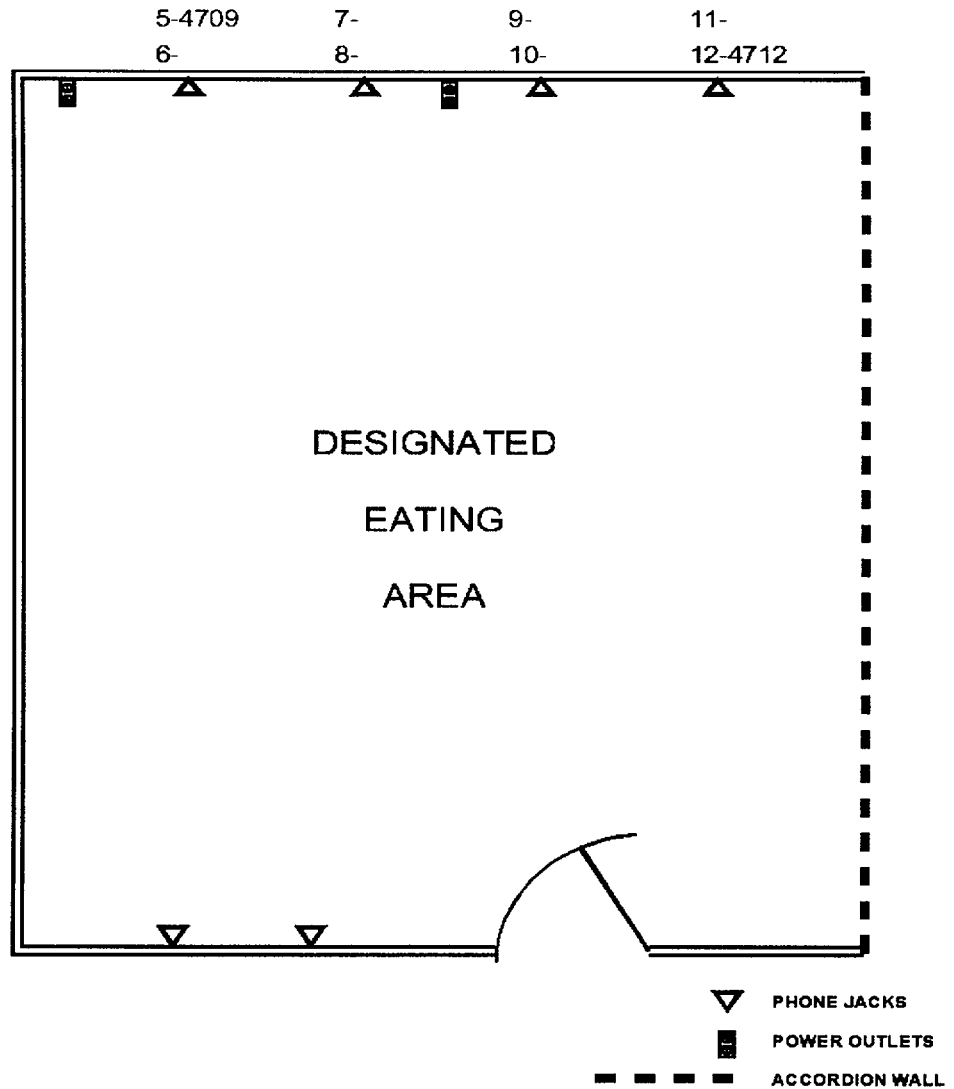
ATTACHMENT 1
Page 1 of 1
Emergency Operations Facility (EOF) Organization



ATTACHMENT 2
Page 1 of 1
Emergency Operations Facility (EOF) Recommended Layout
Room 122/123



ATTACHMENT 3
Page 1 of 1
**Emergency Operations Facility (EOF) Layout
Room 132**

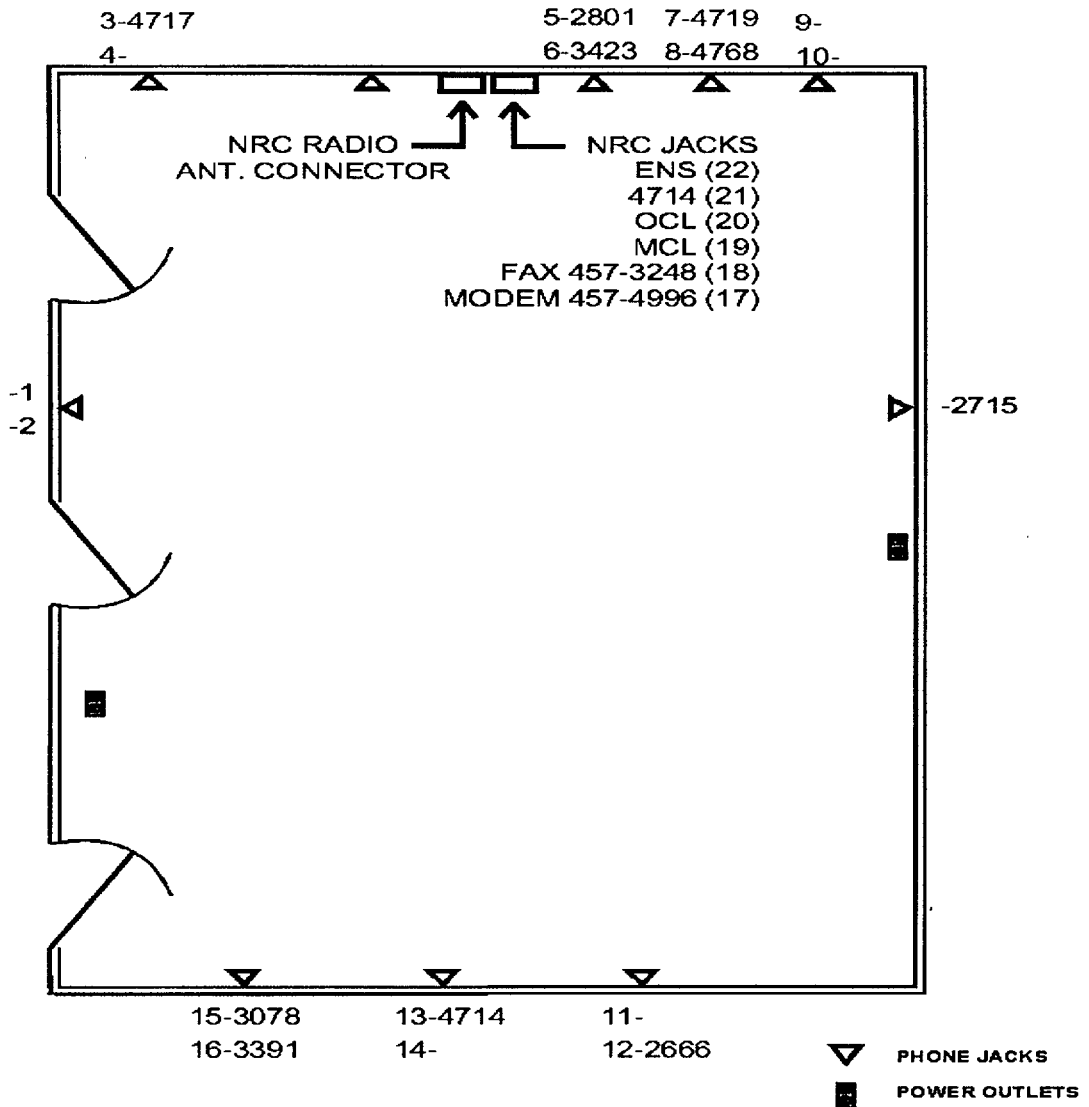


NOTE: This room is a work area to accommodate NRC personnel for EOF support and will be used as a designated eating area.

NOTE: Tables and chairs may be added and arranged as necessary.

NOTE: Plug all telephones into their respective jacks if needed (phones are stored in supply cabinets in Room 128/132).

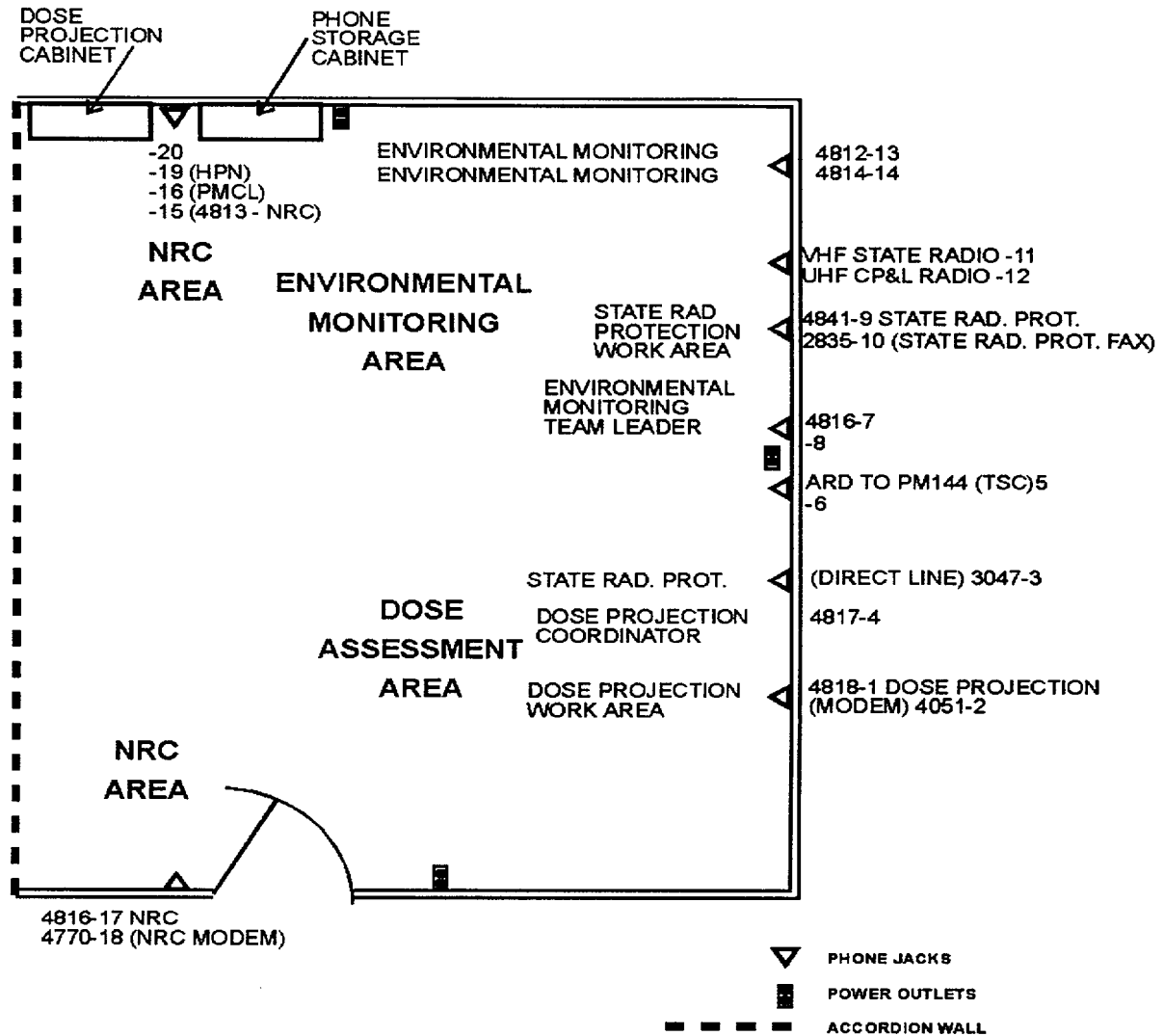
ATTACHMENT 4
Page 1 of 1
**Emergency Operations Facility (EOF) Layout
Room 131**



NOTE: Plug radios into their respective jacks (NRC supplies the radios).

NOTE: Tables may be arranged as necessary.

ATTACHMENT 5
Page 1 of 1
**Emergency Operations Facility (EOF) Layout
Room 128**



NOTE: This room is used for EOF support staff. Tables and chairs may be added and arranged as necessary.

NOTE: Plug all telephones into their respective jacks if needed (phones are stored in supply cabinets in Room 128/132).

NOTE: Obtain additional maps, charts, and other equipment from Room 122/123 Storage Cabinet area.

ATTACHMENT 6

Page 1 of 2

Facility Turnover/Briefing Work Sheet
(Completion Optional)

A. EMERGENCY CLASSIFICATION (CIRCLE)

UNUSUAL EVENT ALERT SITE AREA EMERGENCY GENERAL EMERGENCY

- Initiating Events and EALs exceeded:

- Status of Emergency Procedure Implementation and Mitigation Actions:

B. PLANT/REACTOR STATUS (CIRCLE)

STABLE DEGRADING IMPROVING

- Fission Product Barrier and Safety System Status:

- Evolutions in Progress:

- Radiological Conditions

RELEASE IN PROGRESS (CIRCLE): YES NO

ATTACHMENT 6
Page 2 of 2
**Facility Turnover/Briefing Work Sheet
(Completion Optional)**

C. ON-SITE PROTECTIVE ACTIONS

D. OFF-SITE PROTECTIVE ACTIONS

E. OFF-SITE ASSISTANCE REQUESTS

F. OFF-SITE NOTIFICATIONS

G. STATUS OF ERO ACTIVATION

H. STATUS OF OUTSIDE AGENCY MOBILIZATION

I. SYNCHRONIZE CLOCKS WITH CONTROL ROOM

ATTACHMENT 7

Page 1 of 1

**Radiological Controls Manager (RCM) Briefing Work Sheet
(Completion Optional)**

A. HABITABILITY

Dosimetry Status
Eating/Drinking/Smoking
Air Sampling / Dose Rates in EOF
Ventilation Status
Access Control to Building/EOF

B. MET INFORMATION

Stability Class
Wind Direction
Population at Risk (Towns, Schools, etc.)
Forecast
Equipment Problems

C. DOSE PROJECTION

Projection Based On
Max TEDE Dose $TEDE = \text{Internal} + \text{External}$
Max Thyroid Dose (**organ specific**) $TEDE = (CEDE) + (EDE_{\text{immersion}} + EDE_{\text{deposition}})$
Equipment Problems

D. PROTECTIVE ACTION RECOMMENDATIONS

Evacuate Zones
Shelter Zones
State/Counties PARs

E. ENVIRONMENTAL MONITORING RESULTS

Number of Teams and Locations
Number of State Teams and Locations
Dose Rates and Locations
Air Sample Results and Locations
Administer KI (YES or NO)
Equipment Problems

ATTACHMENT 8
Page 1 of 1
Event Classification Message Display

NOTE: Remote Control **MUST** be used (15 ft range).

NOTE: Message board will beep when a command has successfully been entered.

I. To Select A Message

- A. Plug in display electrical connection.
- B. Press "STOP/RUN" button on remote control (bottom right corner).
- C. Select message you wish displayed:

<u>PROGRAM</u>	<u>MESSAGE</u>
A	No Event
B	Unusual Event
C	Alert
D	Site Area Em
E	General Emer

- D. Press program letter corresponding to the message you want displayed on the remote control.
- E. Press "STOP/RUN" button.
- F. Display should show the message selected.

II. To Secure the Display

- A. Repeat Step I and select the "No Event" message.
- B. Unplug the display.

ATTACHMENT 9
Page 1 of 2
Guidance for Information Transmittal to JIC

1. Declaration of Emergency Classifications
 - Times
 - Plant Conditions that Created Emergency
2. Status of Plant
 - Shutdown (Hot, Cold, Standby)
 - Degrading Conditions
 - Corrective Actions
 - Power Reduction Rate
 - Fission Product Barrier Breached or In Jeopardy
3. Status of Notifications Made to Offsite Agencies
 - What Agency and When
4. Activation times of Onsite and Offsite Emergency Facilities
 - What Facility and When
 - Who is in Charge
5. Personnel Concerns
 - Site Evacuation, Accountability
 - Injured, Contaminated - Transported, by Whom, and Where
6. Meteorological Data
 - Wind Speed, Direction, Precipitation
7. Any Release of Radiation to the Environment

ATTACHMENT 9

Page 2 of 2

Guidance for Information Transmittal to JIC

8. Dose Projections [Whole Body (TEDE) and Thyroid (CDE)] and Actual Field Readings
 - Hypothetical Versus Actual Dose Projections
 - Location - Site Boundary, 2-Mile, 5-Mile, and 10-Mile
 - Radiation Monitoring Teams, How Many, and Where
9. Plant Radiation Monitors
 - Plant Areas Seeing Abnormal Radiation Levels
 - Impact on Plant Activities
10. Site Repair Teams
 - What Repairs, Priority
 - Times to Completion
11. Protective Action Recommendations Made to Offsite Agencies and If Accepted
 - Basis for Recommendation
 - Shelter, Evacuation, Zones Involved
12. Times that Sirens have Sounded or are Projected to be Sounded
13. Requests for Off-site Assistance (that is, Fire, Rescue, Ambulance, Helicopter, Local Law Enforcement)
 - Why, from Where
 - Arrival and Departure Times
14. Information Announced in EOF Briefings
15. Recovery Status

ATTACHMENT 10

Page 1 of 2

Status Board Plotter Headset Cordless Phone

NOTE: The EOF Status Board Plotter headset cordless phone is located near the Communications Manager's work station.

NOTE: This headset requires AC power to operate. When the AC power is off, you cannot dial out or receive incoming calls via the headset cordless phone.

a) Setup and Operation

- (1) Ensure the phone line is connected to the base of the headset.
- (2) Ensure the AC adapter's barrel is plugged into the DC 12V jack on the back of the base and the adapter is plugged into a standard AC outlet.
- (3) Lift the base antenna to a vertical position.
- (4) Place the headset on your head with the earpiece over either ear and adjust the headset band until it rests with almost no pressure on your ear and the top of your head.

NOTE: The TSC Status Board Plotter will initiate the communications link between the facilities.

- (5) When the telephone rings, press "TALK" on the cordless keypad to begin the call. Also, press "TALK" to end a call.

ATTACHMENT 10

Page 2 of 2

Status Board Plotter Headset Cordless Phone

b) Headset Volume Control Adjustment and Muting

- (1) To adjust the headset's volume, repeatedly press "VOLUME <up>" or "VOLUME <down>" during a call until the sound level is comfortable.

NOTE: The "MUTE" button is located directly under the "TALK" button on the keypad. (Be careful not to confuse "MUTE" with "TALK".)

- (2) To talk with someone else in the room without the person on the other end of the phone line hearing your conversation, press "MUTE". Press "MUTE" again to resume your phone conversation.

c) Changing the Battery

NOTE: Replace the battery pack with the spare battery when the "LOW BATT" indicator on the keypad flashes. This headset provides about 8 hours of talk time per battery when fully charged or 7 days of standby time.

NOTE: An illuminated "CHARGE" light on the base indicates the spare battery is being charged. An illuminated "CHARGE/IN USE" light on the base indicates the primary battery installed in the keypad is charging.

- (1) To remove the old battery pack, press the latch release, then slide the battery pack back and lift it from the keypad.
- (2) To connect the new battery pack, line up the slots on the battery pack with the posts on the keypad. Press down and slide it forward until the latch clicks.

REVISION SUMMARY

Revision 11 of OPEP-02.6.27 consists of:

- Instructions for staffing the HPN Communications line in Section 5.4.30.1.
- Additional guidance for the HPN Communicator when making NRC notifications in Section 5.14.8.
- Correction of typographical errors.
- Additional references in Section 2.
- Clarification concerning EOF clock synchronization in Section 5.4.6.
- Correction of Attachments 2 through 5 due to EOF room reconfiguration.



PLANT OPERATING MANUAL

VOLUME XIII

PLANT EMERGENCY PROCEDURE

UNIT
0



OPEP-03.7.6

EMERGENCY EXPOSURE CONTROLS

REVISION 2

TABLE OF CONTENTS

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1.0 PURPOSE

This procedure provides guidelines and administrative controls for radiation worker exposures in excess of 10CFR20 limits and for the issuance of potassium iodide during emergencies.

2.0 REFERENCES

- 2.1 Title 10, Code of Federal Regulations, Part 20, "Standards for Protection Against Radiation"
- 2.2 Environmental Protection Agency, EPA-400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents", USEPA, May 1992.
- 2.3 NRC Notice 88-15, Availability of U.S. Food and Drug Administration (FDA) Approved Potassium Iodide for Use in Emergencies Involving Radioactive Iodine
- 2.4 Federal Register, Vol. 50, No. 142, p. 30258, July 24, 1985 - Federal Emergency Management Agency - "Federal Policy on Distribution of Potassium Iodide Around Nuclear Power Sites for use as a Thyroidal Blocking Agent"
- 2.5 Federal Register, Food & Drug Administration, Title 21, Code of Federal Regulations, Part 1090, December 15, 1978 "Potassium Iodide as a Thyroid Blocking Agent in a Radiation Emergency"
- 2.6 The Food and Drug Administration Approved Patient Package Insert for Commercially Packaged Potassium Iodide
- 2.7 NUREG/CR-1433, Examination of the Use of Potassium Iodide as an Emergency Protective Measure for Nuclear Reactor Accidents

3.0 DEFINITIONS

- 3.1 **Committed Dose Equivalent (CDE)** - The dose equivalent to a specific organ or tissue integrated over a 50-year period due to radionuclides in the body.
- 3.2 **Corrective Action** - Actions taken to mitigate the circumstances of emergencies to include those taken to repair damaged equipment, install emergency structures, system, and components, or reduce the release of radioactivity.

3.0 DEFINITIONS

- 3.3 **Effective Dose Equivalent (EDE)** - The sum of the products of the dose equivalent to each organ and a weighing factor related to the risk of delayed health effects in the respective organ. Units are in REM.
- 3.4 **Emergency Exposures** - Radiation exposures to individuals conducting lifesaving or accident mitigating actions which may exceed 10CFR20 limits.
- 3.5 **Lifesaving Action** - Actions related to the search for and rescue of injured persons, or corrective, or protective actions to mitigate conditions which could result in imminent injury or substantial over exposure to an individual.
- 3.6 **Thyroid Blocking Agent** - A non-prescription (over the counter) drug that is effective in reducing the accumulation of radioiodine which has entered the body through inhalation or ingestion by the thyroid gland.
- 3.7 **Total Effective Dose Equivalent (TEDE)** - The sum of the deep dose equivalent and the committed effective dose equivalent.

4.0 RESPONSIBILITIES

- 4.1 The Emergency Response Manager is responsible for authorization of exposures in excess of 10CFR20 limits and approval of the administration of potassium iodide (KI) for station ERO personnel performing offsite functions.
- 4.2 The Site Emergency Coordinator is responsible for authorization of exposures in excess of 10CFR20 limits and approval of the administration of potassium iodide (KI) for station ERO personnel performing onsite functions.
 - 4.2.1 The Site Emergency Coordinator is also responsible for authorization for personnel performing offsite functions whenever the EOF has not activated.
- 4.3 The Radiological Controls Director is responsible for:
 - 4.3.1 Ensuring that proper emergency exposure guidelines are followed by onsite personnel.
 - 4.3.2 Evaluating, recognizing, and recommending to the Site Emergency Coordinator KI needs for on-site personnel.

4.0 RESPONSIBILITIES

4.4 The Radiological Controls Manager is responsible for:

- 4.4.1 Ensuring that proper emergency exposure guidelines are followed by Field Monitoring Teams and other Emergency Operations Facility (EOF) personnel.
- 4.4.2 Evaluating, recognizing, and recommending to the Emergency Response Manager KI needs for Field Monitoring and EOF personnel.

5.0 INSTRUCTIONS

NOTE: Radiation exposures to emergency personnel shall be maintained As Low As Reasonably Achievable (ALARA) and, when possible, shall be maintained within the BNP administrative exposure guides and/or less than the radiation exposure limits in 10CFR20.

5.1 Pre-Exposure Evaluation

- 5.1.1 When it has been determined that exposures may result in a dose in excess of 10CFR20 limits and prior to authorizing re-entry into an area of unknown or elevated radiation levels, the Site Emergency Coordinator shall, with guidance provided by the Radiological Controls Director, consider and ensure the following:
(These guidelines also apply for plume exposures for environmental monitoring teams evaluated by the ERM and RCM.)
 - 1. The risk of not performing the task shall be evaluated against the anticipated or allowable exposure.
 - 2. Personnel should not enter any area where dose rates are unmonitored or immeasurable without Radiological Controls coverage.
 - 3. Dosimetry equipment capable of measuring the anticipated maximum exposure and type of radiation shall be worn by personnel receiving emergency exposures.
 - 4. Where practical, all attempts shall be made to keep emergency exposures ALARA (for example, use of protective clothing, respiratory protection, thyroid blocking agent).

5.1 Pre-Exposure Evaluation

5.1.2 Re-entry teams expected to enter areas with excessive radiation levels must be fully briefed before entry. The Radiological Controls Director shall ensure that at a minimum the briefing shall include:

1. The purpose of the re-entry and the expected actions and surveys.
2. Anticipated radiological conditions and other possible hazards.
3. Dose limits and/or stay times.
4. Dosimetry, protective clothing, and respiratory protection as required.
5. Primary and alternate travel routes including directions for continuous monitoring while enroute.
6. Actions to be taken and communications for unexpected conditions.

5.2 Emergency Exposure Documentation

NOTE: Although it is preferable to document authorization prior to emergency exposures, authorization may be granted verbally and documented as soon as possible thereafter.

5.2.1 When it has been determined that exposures may result in a dose in excess of 10CFR20 limits, the Radiological Controls Director shall:

CAUTION

Personnel receiving exposures anticipated to be in excess of 10CFR20 limits shall be familiar with the risks and consequences of the radiological exposure.

1. Determine an appropriate emergency exposure level and recommend it's use.
2. Identify qualified individuals for the task which may require exposure in excess of the 10CFR20 limits.

5.2 Emergency Exposure Documentation

3. Brief all personnel who will receive an emergency exposure on the consequences of exposures beyond the 10CFR20 limits prior to receiving the dose (guidance given in Attachment 2).
4. Complete the Emergency Exposure Authorization Form (Attachment 1). The Site Emergency Coordinator/Emergency Response Manager shall authorize the emergency exposure level to each individual by signature.
5. Attach the Emergency Exposure Authorization Form to the Mission Authorization Form provided in OPEP-02.6.12.

5.3 Post-Exposure Evaluation

5.3.1 Following entry into an affected area, the Radiological Controls Director shall ensure:

1. All individuals(s) are debriefed and dosimeter readings recorded. Actual exposures are documented on Attachment 1 for 10CFR20 reporting requirements and inclusion in the individual's personnel exposure history.
2. The NRC is notified immediately of any determination that actual exposures have exceeded 10CFR20 limits.
3. Individuals receiving emergency exposures are restricted from further occupational radiation exposure pending the outcome of exposure evaluations and medical surveillance.
4. The company's designated physician is contacted for follow-up care and further evaluation as required.
5. Bioassay or whole body counting is performed in accordance with plant procedure for personnel suspected of having internal contamination; and the results are entered onto the current dosimetry computer dose tracking system or that documentation facilitates entry onto the current dosimetry computer dose tracking system at a later time.

5.4 Administration of Potassium Iodide (KI)

CAUTION

KI distribution is a supplemental strategy to be considered along with other protective measures. The use of KI can significantly reduce the number of thyroid nodules resulting from the ingestion of radioiodines; however, it has no impact on immediate health effects and only a moderate impact on delayed cancer deaths.

- 5.4.1 Upon receipt of in-plant and/or offsite radioiodine data, the Radiological Controls Director or Radiological Controls Manager, as applicable, shall determine the need for KI and recommend its use as follows:
1. If radioiodine will be a contributor to the release dose, KI should be considered for the worker.
 2. KI is 90% effective in blocking the uptake of radioiodine by the thyroid if administered within the first hour of uptake and is 50% effective if administered within four (4) hours after uptake.
 3. Minimal benefit will be obtained if KI is administered >10-14 hours after exposure and therefore should not be administered beyond this exposure period.
 4. KI remains 80% effective in blocking the uptake of radioiodine when taken as long as 20 hours **before** the exposure.
- 5.4.2 KI will be issued from Emergency Kits stored in the Main Control Room, Technical Support Center, Operations Support Center, Emergency Operations Facility, and the Environmental Monitoring Kits as follows:

NOTE: Any known allergic reaction to shellfish may indicate a similar sensitivity to Potassium Iodide (KI).

1. Brief personnel on the use and consequences of KI in accordance with Attachment 4 prior to distribution.

5.4 Administration of Potassium Iodide (KI)

NOTE: Authorization for the distribution of Potassium Iodide (KI) may be approved verbally for Environmental Monitoring Teams.

2. Complete the Potassium Iodide Administration Form (Attachment 3). The Emergency Response Manager or the Site Emergency Coordinator shall authorize the administration of KI to each individual worker by signature.

NOTE: Expired KI tablets as indicated by the expiration date on the bottle shall not be issued.

3. Provide one 130 mg tablet to each individual who is to receive KI.
 4. Continue using one 130 mg KI tablet daily for a minimum of three days (if exposed to radioiodines) but no more than 10 days unless approved by the company's designated physician.
 5. Contact the company's designated physician and request follow-up care and definitive guidance concerning KI administration.
 6. Record each issuance of KI on the Potassium Iodide Administration Form (Attachment 3).
- 5.4.3 Return completed records to the Radiological Controls Director/Manager.
- 5.4.4 Perform follow-up whole body counts and bioassay analysis on those emergency workers using thyroid blocking agents as prescribed by the company's designated physician.
- 5.5 Completed documents shall be forwarded to the Radiological Controls Director or Manager, as applicable, who reviews and submits all records to the Supervisor - Emergency Preparedness .

ATTACHMENT 1
Page 1 of 1
Emergency Exposure Authorization Form

Date: _____

I have been briefed on the mission and understand the radiological consequences and hazards associated with the authorized emergency exposure to perform the task described below.

Name	SSN	TLD #	Signature	Time

Brief Description of Task: _____

Authorized Exposure Limit: _____

Actual Exposure Received: _____

Briefed by: _____
Signature Time: _____

Recommended: _____
Radiological Controls Director/Manager Time: _____

Approved: _____
SEC/Emergency Response Manager Time: _____

ATTACHMENT 2
Page 1 of 3
Emergency Exposure Guidelines

Exposure guidelines in this attachment are consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides described in EPA 400-R-92-001.

Every reasonable effort will be used to ensure that an emergency is handled in such a manner that no worker exceeds the normal exposure limits, including the administering of radioprotective drugs. In emergency situations, workers may receive exposure under a variety of circumstances in order to assure safety and protection of others and of valuable property. These exposures will be justified if the maximum risks or costs by the actions outweigh the risks to which the workers are subjected. The Emergency Worker Dose Limit Guidelines are as follows:

Dose Limit (Rem TEDE)	Activity	Condition
5	All	
10	Protecting valuable property	Lower dose not practicable
25	Lifesaving or protection of large populations	Lower dose not practicable
> 25	Lifesaving or protection of large populations	Only on a voluntary basis to persons fully aware of the risks involved.

Limit dose to the lens of the eye to 3 times the above values and doses to any other organ (including skin and body extremities) to 10 times the above values.

Routine dose limits shall not be extended to emergency dose limits for minors or declared pregnant individuals. As in the case of normal occupational exposure, doses received under emergency conditions should be maintained as low as reasonably achievable.

In the context of these limits, exposure that is incurred for the protection of large populations may be considered justified for situations in which the collective dose avoided by the emergency operation is significantly larger than that incurred by the workers involved.

Persons undertaking any emergency operation in which the dose will exceed 25 REM TEDE should do so only on a voluntary basis and with full awareness of the risks involved; including the numerical levels of dose at which acute effects of radiation will be incurred and numerical estimates of the risk of delayed effects.

ATTACHMENT 2
Page 2 of 3
Emergency Exposure Guidelines

Decision making is based on conditions at the time of an emergency and should always consider the probable effects of an exposure prior to allowing any individual to be exposed to radiation levels exceeding the established occupational limits. The probable high radiation exposure effects are:

1. Up to 50 Rem EDE in one day - No physiological changes are likely to be observed.
2. 50-100 Rem EDE - No impairment likely but some physiological changes, including possible temporary blood changes may occur. Medical observations will be required after exposure.
3. 100-300 Rem EDE - Some physical impairment possible; some lethal exposures possible.

Health effects associated with whole body absorbed doses received within a few hours.

ABSORBED DOSE (RAD)	*PRODROMAL EFFECTS (PERCENT)	EARLY FATALITIES (PERCENT)
50	2 %	
100	15 %	
140		5 %
150	50 %	
200	85 %	15 %
250	98 %	
300		50 %
400		85 %
460		95 %

* Prodromal - Forewarning symptoms of a more serious health effect associated with large doses of radiation.

ATTACHMENT 2
Page 3 of 3
Emergency Exposure Guidelines

Approximate cancer risk to an average individual from 25 Rem effective dose equivalent delivered promptly.

AGE AT EXPOSURE (YEARS)	APPROXIMATE RISK OF PREMATURE DEATH (PER 1000 EXPOSED)	AVERAGE YEARS OF LIFE LOST DUE TO PREMATURE DEATH (YEARS)
20 to 30	9.1	24
30 to 40	7.2	19
40 to 50	5.3	15
50 to 60	3.5	11

ATTACHMENT 3
Page 1 of 1
Potassium Iodide (KI) Administration Form

Date: _____

Name: _____
(Last) (First) (MI)

SSN: ____-____-____

I have read and understand the precautions in Attachment 4 and understand that taking KI is voluntary. I also verify to the best of my knowledge I have no known allergies to iodide or any other medical conditions such as hypertension (high blood pressure), renal (urinary), thyroid, heart, or diabetes which could be affected when taking KI.

Signature of Individual Taking KI

Time: _____

Projected Thyroid Dose (Estimated) _____ Rem

Respiratory Protection Worn: Yes No Protection Factor: _____

Recommended By: _____
Radiological Controls Director/Manager

Approved By: _____
SEC/Emergency Response Manager

KI Administration Record

Date	Time	Expiration	Issued By

ATTACHMENT 4

Page 1 of 1

The FDA Approved (KI) Package Insert

**THYRO-BLOCK®
TABLETS**

(POTASSIUM IODIDE TABLETS, USP)

(pronounced *po-TASS-uh-uh EYE-oh-dyeh*)
(abbreviated: KI)

TAKE POTASSIUM IODIDE ONLY WHEN PUBLIC HEALTH OFFICIALS TELL YOU. IN A RADIATION EMERGENCY, RADIOACTIVE IODINE COULD BE RELEASED INTO THE AIR. POTASSIUM IODIDE (A FORM OF IODINE) CAN HELP PROTECT YOU.

IF YOU ARE TOLD TO TAKE THIS MEDICINE, TAKE IT ONE TIME EVERY 24 HOURS. DO NOT TAKE IT MORE OFTEN. MORE WILL NOT HELP YOU AND MAY INCREASE THE RISK OF SIDE EFFECTS. DO NOT TAKE THIS DRUG IF YOU KNOW YOU ARE ALLERGIC TO IODIDE. (SEE SIDE EFFECTS BELOW.)

INDICATIONS

THYROID BLOCKING IN A RADIATION EMERGENCY ONLY.

DIRECTIONS FOR USE

Use only as directed by State or local public health authorities in the event of a radiation emergency.

DOSE

Tablets:

ADULTS AND CHILDREN 1 YEAR OF AGE OR OLDER: One (1) tablet once a day. Crush for small children.
BABIES UNDER 1 YEAR OF AGE: One-half (1/2) tablet once a day. Crush first.

Take for 10 days unless directed otherwise by State or local public health authorities.

Store at controlled room temperature between 15° and 30°C (59° to 86°F). Keep container tightly closed and protect from light.

WARNING

Potassium iodide should not be used by people allergic to iodide. Keep out of the reach of children. In case of overdose or allergic reaction, contact a physician or the public health authority.

DESCRIPTION

Each THYRO-BLOCK® TABLET contains 130 mg of potassium iodide. Other ingredients: magnesium stearate, microcrystalline cellulose, silica gel, sodium thiosulfate.

HOW POTASSIUM IODIDE WORKS

Certain forms of iodine help your thyroid gland work right. Most people get the iodine they need from foods, like iodized salt or fish. The thyroid can "store" or hold only a certain amount of iodine.

In a radiation emergency, radioactive iodine may be released in the air. This material may be breathed or swallowed. It may enter the thyroid gland and damage it. The damage would probably not show itself for years. Children are most likely to have thyroid damage.

If you take potassium iodide, it will fill up your thyroid gland. This reduces the chance that harmful radioactive iodine will enter the thyroid gland.

WHO SHOULD NOT TAKE POTASSIUM IODIDE

The only people who should not take potassium iodide are people who know they are allergic to iodide. You may take potassium iodide even if you are taking medicines for a thyroid problem (for example, a thyroid hormone or antithyroid drug). Pregnant and nursing women and babies and children may also take this drug.

HOW AND WHEN TO TAKE POTASSIUM IODIDE

Potassium iodide should be taken as soon as possible after public health officials tell you. You should take one dose every 24 hours. More will not help you because the thyroid can "hold" only limited amounts of iodine. Larger doses will increase the risk of side effects. You will probably be told not to take the drug for more than 10 days.

SIDE EFFECTS

Usually, side effects of potassium iodide happen when people take higher doses for a long time. You should be careful not to take more than the recommended dose or take it for longer than you are told. Side effects are unlikely because of the low dose and the short time you will be taking the drug.

Possible side effects include skin rashes, swelling of the salivary glands, and "iodism" (metallic taste, burning mouth and throat, sore teeth and gums, symptoms of a head cold, and sometimes stomach upset and diarrhea).

A few people have an allergic reaction with more serious symptoms. These could be fever and joint pains, or swelling of parts of the face and body and at times severe shortness of breath requiring immediate medical attention.

Taking iodide may rarely cause overactivity of the thyroid gland, underactivity of the thyroid gland, or enlargement of the thyroid gland (goiter).

WHAT TO DO IF SIDE EFFECTS OCCUR

If the side effects are severe or if you have an allergic reaction, stop taking potassium iodide. Then, if possible, call a doctor or public health authority for instructions.

HOW SUPPLIED

THYRO-BLOCK® TABLETS (Potassium Iodide Tablets, USP) bottles of 14 tablets (NDC 0037-0472-20). Each white, round, scored tablet contains 130 mg potassium iodide.

REVISION SUMMARY

Removed the 25 Rem thyroid criteria, replaced with consider use of KI at any time radioiodine will be contributor to release dose. This is consistent with Section 2.5 of EPA-400. Replaced the acronym "RIMS" with the phrase " the current dosimetry computer dose tracking system" to facilitate change over to new dose tracking system by the end of the year.