FENOC
FirstEnergy Nuclear Operating Company

Perry Nuclear Power Plant
10 Center Road
P.O. Box 97
Perry, Ohio 44081

April 19, 2001
PY-CEI/NRR-2564L

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Submittal of Emergency Plan
Implementing Instructions

Gentlemen:

Pursuant to 10 CFR 50 Appendix E, enclosed are changes to the Emergency Plan Implementing Instructions (EPIs) for the Perry Nuclear Power Plant. These changes constitute revisions, temporary changes, or reissued pages. Please follow the updating instructions per the attached Controlled Document Instruction Sheet and return the signed Acknowledgment of Receipt form.

If you have questions or require additional information, please contact me at (440)280-5294.

Very truly yours,

Dan Cleavenger for Vernon K. Higaki

Vernon K. Higaki, Supervisor
Emergency Planning Unit

VKH:byr

Enclosure

cc: NRC Project Manager
NRC Resident Inspector
NRC Region III, Incident Response Center w/2 attachments

A045

FirstEnergy Nuclear Operating Company

PERRY NUCLEAR POWER PLANT

UNIT 1 & 2

ACKNOWLEDGMENT OF RECEIPT

Title Emergency Plan Implementing Instruction (EPI-A1), Rev. 6 C-5

Control No. 60

Letter No./Date PY-CEI/NRR-2564L / April 27, 2001

_____ _____

Signature Date

_____

Title

Return to:

Perry Nuclear Power Plant
Attn: Beverly Richardson, A240
P. O. Box 97
Perry, Ohio 44081

FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant

Controlled Document Instruction Sheet

Manual: Emergency Plan Implementing Instruction (EPI) for Perry Nuclear Power, EPI –A-0001, R/6, C-5

Control Number 60

Remove the pages listed below and insert enclosed pages:

Revision Number	Temporary Change No.	Insert	Remove
6	C-5	i thru 14, 55-56	

The Cleveland Electric Illuminating Company

PERRY OPERATIONS MANUAL

Emergency Plan Implementing Instruction

TITLE: EMERGENCY ACTION LEVELS

REVISION: 6 EFFECTIVE DATE: 7-10-97

PREPARED: Joseph D. Anderson 11-6-96
/ Date

EFFECTIVE PIC's

PIC No.	Type of Change	Effective Date
1	Intent	3-16-98
2	Intent	6-15-98
4	Intent	12-17-98
5	Non-Intent	4-4-01

EMERGENCY ACTION LEVELS

Table of Contents

SCOPE OF REVISION:

Periodic Review - Required

Rev. 6 - 1. TC's from previous revision that were evaluated for incorporation - TCN-1.
2. Implements NUMARC/NESP-007 EAL Methodology.

Change History

PIC Number: 1 Affected Pages: i, iii, 9, 13, 14, 18, 20, 21, 22, 23, 25, 27, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 50, 62, 64

Summary of Change:
1. EALs revised to address licensed operator comments from NUMARC/NESP-007 EAL training.

PIC Number: 2 Affected Pages: i, iii, 7, 7a, 48, 56, 59

Summary of Change:
1. Revises Section 5.1.6.3 to address the timeliness of classification based on EPPOS No. 2.
2. Revises Table 4-1 EAL Initiating Condition (IC) HG1 to provide user reference to PEI-D17 for emergency depressurization criteria. (PIF 98-0375)
3. Revises Table 4-1 EAL-IC-KU2 to clarify the extent of a significant degradation of offsite communications capabilities based on NUMARC/NESP-007 (Rev. 2) basis guidance. (PIF 98-0238)
4. Revises Table 4-1 EAL IC MU1 to define access restrictions impacting plant operation. (PIF 98-0140)

PIC Number: 4 Affected Pages: i, iii, 18, 25

Summary of Change:
1. Changed references to PEI-T23, Containment Flooding to SAG-1, Primary Containment Flooding due to implementation of the new Severe Accident guidelines.

PIC Number: 5 Affected Pages: i, iii, 2, 6, 7, 8, 9, 11, 13, 14, 56

Summary of Change:
1. Deleted references to PAP-1122 and referenced instead that the Integrated On-Call Report is found on the Perry Web under Emergency Response Organization.
2. Corrected various typos.
3. Changed term from "Operating Condition" to "Operating Mode" to be consistent with Technical Specifications.
4. Corrected wording of the note in EAL KU2 regarding "extraordinary means".
5. Added EOF, JPIC and PIRT to section 5.5 to facilitate activation of these facilities in a non-emergency event as necessary.
6. Corrected the Event Category "G" name on the Initiating Condition Index on page 13 to be consistent with EAL page.
7. Added the Simulator to list of where the Fission Product Matrix is located.

EMERGENCY ACTION LEVELS

1.0 PURPOSE

To provide specific criteria based on <NUMARC/NESP-007> for the classification of an abnormal plant event transient, or external event affecting or having the potential to affect plant operations or personnel safety, into one of the four (4) <NUREG-0654> defined emergency classes.

2.0 REFERENCES

2.1 Source References:

1. Emergency Plan for Perry Nuclear Power Plant (PNPP) Docket Nos. 50-440, 50-441
2. Offsite Dose Calculation Manual (ODCM) - Appendix C

2.2 Use References:

1. NUREG 0654: "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants"
2. NUMARC/NESP-007: "Methodology for Development of Emergency Action Levels (Revision 2)
3. Title 10, Part 50.47 of the Code of Federal Regulations (CFR): "Emergency Plans"
4. Title 10, Part 50.72 of the Code of Federal Regulations (CFR): "Immediate Notification Requirements for Operating Nuclear Power Reactors"
5. Technical Specifications (TS), Perry Nuclear Power Plant, Unit No. 1
6. Emergency Plan Implementing Instruction (EPI) A2: "Emergency Actions Based on Event Classification"
7. Emergency Plan Implementing Instruction (EPI) A10: "Re-Entry Recovery"
8. Emergency Plan Implementing Instruction (EPI) B1: "Emergency Notification System"
9. Emergency Plan Implementing Instruction (EPI) B4: "First Aid and Medical Care"
10. Emergency Plan Implementing Instruction (EPI) B9: "Emergency Records"

11. Off-Normal Instruction (ONI) C61: "Evacuation of the Control Room"

12. Off-Normal Instruction (ONI) P54: "Fire"

13. Off-Normal Instruction (ONI) R10: "Loss of AC Power"

14. Plant Administrative Procedure (PAP) 1604: "Reports Management"

15. Plant Administrative Procedure (PAP) 1701: "Records"

16. Plant Administrative Procedure (PAP) 1911: "Fire Emergency"

17. Plant Emergency Instruction (PEI) B13: "RPV Control"

18. Plant Emergency Instruction (PEI) T23: "Containment Control"

19. Plant Emergency Instruction (PEI) N11: "Containment Leakage Control"

20. Integrated Operating Instruction (IOI) 11: "Shutdown from Outside Control Room"

21. PNPP Physical Security Plan

22. Preparedness Support Instruction (PSI) 0007: "Reporting Emergency Plan Related Communication Equipment Problems"

23. Commitments addressed in this document:

F00735	L00406	P00055	P00091
F01626	P00035	P00067	
H00037	P00038	P00089	

3.0 DEFINITIONS

3.1 Applicable Mode

The operating mode existing at the time of event or initiation of transient.

3.2 Challenge

Any condition that, in the Emergency Coordinator's judgment, would likely result in a loss of one or more of the fission product barriers (i.e., fuel cladding, Reactor Coolant System (RCS), or Containment) in the next 1-3 hours.

3.3 Emergency Action Level (EAL)

A predetermined, site-specific, observable threshold or entry criteria for a given Initiating Condition that places the plant in a given emergency class. An EAL entry criteria can be: an equipment status indicator; a measurable parameter (onsite or offsite); a discrete, observable event; results of analyses; entry into specific emergency operating procedures; or another phenomenon which, if it occurs, indicates entry into a particular emergency class. Refer to EAL Entry Criteria (Attachment 2).

3.4 Emergency Class

One of a minimum set of names or titles, established by the Nuclear Regulatory Commission (NRC) under <10CFR50.47>, for grouping off-normal nuclear power plant conditions according to (1) their relative radiological seriousness, and (2) the time-sensitive onsite and offsite radiological emergency preparedness actions necessary to respond to such conditions. The existing radiological emergency classes, in ascending order of seriousness, are called:

- o Unusual Event
- o Alert
- o Site Area Emergency
- o General Emergency

3.5 Event Category

A collection of similar Initiating Conditions grouped to allow for the prompt recognition of the transient or event and assessment of severity based on the four emergency classes.

3.6 Functional

A system, subsystem, train, component or device, though degraded in equipment condition or configuration, is FUNCTIONAL if it is capable of maintaining respective system parameters within acceptable design limits.

3.7 Initiating Condition (IC)

One of a predetermined subset of plant conditions defined by <NUMARC/NESP-007>, where either the potential exists for a radiological emergency or such an emergency has occurred. Initiating Conditions are established based on the four emergency classes required under <10CFR50.47>. Refer to Initiating Condition Index (PNPP No. 8852, Attachment 1).

3.8 Loss

Unless defined by specific EAL indication, LOSS shall be defined as a state of inoperability in which FUNCTIONAL and operable status cannot be maintained. A system, subsystem, train, component or device is not lost if its functionality is assured.

3.9 Operating Mode

There are six applicable operating modes associated with the Initiating Conditions used in this document: numbers 1 through 5, and the letter "D". Numbers 1 - 5 correspond to Modes 1 through 5 defined by <Technical Specifications> Table 1.1-1; the letter "D" stands for the reactor DEFUEL condition.

3.10 Safe Shutdown Buildings/Areas

For event classification purposes, Safe Shutdown Buildings/areas are considered to be the following locations:

Control Complex (all elevations)
Auxiliary Building (all elevations)
Intermediate Building (all elevations)
Fuel Handling Building (all elevations)
Reactor Building (all elevations)
Emergency Service Water Pump House (all elevations)
Electrical Duct Chase Leading to ESW Building
Diesel Generator Building (all areas except the Unit 2 Division 1, 2, and 3 DG Rooms)
Steam Tunnel (all elevations)
Diesel Generator Fuel Oil Storage Area
Condensate Storage Tank
Intake/Discharge Structure

3.11 Significant Transient

Includes response to automatic or manually initialed functions such as scrams, runbacks involving greater than 25% thermal power change, ECCS injection, or thermal power oscillations of 10% or greater.

3.12 Unplanned

Any activity which is not previously approved. If an EAL entry condition is satisfied due to preplanned maintenance or testing, the emergency classification is NOT declared. The unplanned designation shall include any activity, including preplanned maintenance or testing, in which the system is inadvertently rendered unavailable.

3.13 Valid

An indication or report condition is considered to be VALID when it is conclusively verified by (1) an instrument channel check, or (2) indications on related or redundant indicators, or (3) by direct observation by plant personnel, such that doubt related to the indicator's operability, the condition's existence, or the report's truth is removed. Implicit in this definition is the need for timely assessment, i.e., within 15 minutes.

4.0 RESPONSIBILITIES

4.1 Control Room Shift Supervisor/TSC Operations Manager/EOF Emergency Coordinator

As the designated Emergency Coordinator, classify an Emergency-Plan event per this instruction when actual or potential plant conditions dictate and ensure required actions are implemented per <EPI-A2>.

4.2 Shift Technical Advisor/TSC Operations Advisor/EOF Plant Operations Advisor

Advise the designated Emergency Coordinator of any Initiating Conditions which are being approached or EAL entry criteria met upon initiation of an abnormal or inadvertent plant event.

4.3 Plant Personnel

Inform the Control Room of any conditions or symptoms indicated by instrument readings or direct observations that could indicate a real or potential emergency.

5.0 ACTIONS

The following actions are intended as guidance. Knowledge of plant conditions and/or the extent of the emergency may require additional response actions. In all cases, this instruction should be combined with the sound judgment of the Emergency Coordinator to arrive at the proper classification for a particular set of circumstances. <H00037, P00038>

5.1 Event Assessment and Event Classification

5.1.1 Ensure appropriate Off-Normal Instructions (ONIs), Plant Emergency Instructions (PEIs) or other applicable plant instructions and procedures are being implemented to stabilize plant conditions.

> The classification shall be of high priority following the performance of the required immediate operator actions and must be made promptly if a radioactive release to the public is probable so that offsite agencies can mobilize and implement the necessary precautions to protect the health and safety of the public.

5.1.2 Implement <EPI-B4> if the event involves personnel injuries.

1. Upon being notified that the victim(s) being transported to an offsite medical facility is suspected or known to be radiologically contaminated, perform the following per <EPI-B4>:

   a. Contact an Emergency Planning Unit (EPU) Representative using the Integrated On-Call Report found on the Perry Web under Emergency Response Organization, and direct the individual to notify the State of Ohio and Lake County Emergency management Agencies (EMAs) of the incident.

      NOTE: If the injury(ies) occur during evening hours, this notification can be deferred until the next day.

   b. Perform a four (4) hour notification to the NRC per <PAP-1604> in accordance with <10CFR50.72(b)(2)(v)>.

5.1.3 Implement <ONI-P54> and/or <PAP-1911> if the event involves a confirmed, probable or possible fire. <L00406>

5.1.4 Determine the affected areas of the plant and implement an evacuation of the building or localized plant area. <F01626>

5.1.5 For an abnormal event or evolution which is not classifiable per this instruction, use the Integrated On-Call Report to contact additional plant expertise or manpower if desired for assessment and mitigation purposes.

1. For situations in which the event requires a prompt, coordinated response, refer to Section 5.5 to initiate staffing of the Technical Support Center (TSC) or Operations Support Center (OSC), if warranted.

5.1.6 Classify the emergency as follows:

NOTE: The designated Emergency Coordinator may not delegate the decision to initially classify, reclassify, or terminate an emergency event per <EPI-A1>. <P00035>

1. Using PNPP No. 8852, Attachment 1, identify the emergency by event category and determine the most appropriate Initiating Condition (IC) based on the operating mode at the time of event initiation, plant conditions, and severity levels.

   NOTE: Initiating Condition Index operator aid(s) are located in the Control Room, Simulator Room, Technical Support Center (TSC), Emergency Operations Facility (EOF), and the Backup EOF.

2. Refer to Attachment 2 for the applicable Initiating Condition(s) to determine whether the criteria are met for the operating mode(s) listed.

   NOTE 1: For those EALs with a permitted out of service time or duration (e.g., 15 minutes during electrical transients), the following shall apply:

   - The clock should start at the time of discovery unless there is firm evidence to believe otherwise in which case the clock start time is retroactive.

   - The declaration should be made as soon as it is determined that the transient will last longer than the allotted time. In this case, the declaration shall not be postponed until the permitted time has expired.

   NOTE 2: Fission Product Barrier Matrix operator aids are located in the Control Room, Simulator Room, TSC, EOF and at the Backup EOF.

3. Declare an emergency class when all the conditions listed in at least one EAL column have been met, and implement <EPI-A2>. <H00037>

   a. When several Initiating Conditions are met, declare the most severe emergency class.

A 15-minute goal has been established for assessing and classifying an emergency once indications are available to Control Room operators that an EAL has been exceeded.

   b. For TRANSITORY EVENTS, in which an event is classifiable in accordance with this instruction but becomes a lower classifiable event before being declared (i.e., Alert vs. Site Area Emergency), perform the following:

      1) Declare only the lower classification and implement <EPI-A2>.

      2) Provide a brief description of the transitory event using Block 4c on the PNPP Initial Notification Form.

c. For an Unusual Event or Alert which was classifiable in accordance with <EPI-A1> but no longer meets the criteria for any event at time of declaration, perform the following:

Events which have met the criteria for either an Site Area Emergency or General Emergency can not be simultaneously classified and terminated. These events must be handled in accordance with Sections 5.2 or 5.3.

1) Implement <EPI-A2>, and complete the required actions for a simultaneous classification and termination of an event.

2) Complete Blocks 4.a & 4.b on the PNPP Initial Notification Form to notify the NRC, State of Ohio, and local counties per <EPI-B1>.

4. Periodically re-evaluate emergency class and applicable Initiating Conditions per Steps 2 and 3 above, and escalate the classification, or downgrade/terminate from the event per Sections 5.2 and 5.3. <P00055>

a. Due to the severity of a General Emergency and its impact on Federal, State and local county emergency management agencies, a General Emergency shall not be downgraded. Instead, the event shall be terminated and a predetermined Recovery phase entered from a General Emergency when the criteria in Section 5.3 are met.

5.2 **Downgrading Event** <P00089>

5.2.1 Consider downgrading from a **Site Area Emergency only** to either an Alert or an Unusual Event when the following conditions are met:

Due to the marginal benefit for the plant and State and local county response agencies, the event shall be terminated from an Alert in lieu of downgrading from an Alert to an Unusual Event.

1. The EAL entry criteria for a Site Area Emergency are no longer met; however, the entry criteria for an Alert or an Unusual Event are still applicable.

The EALs have been written towards the initial classification and upgrading of an emergency event. As a result, their logic may not be applicable to downgrading the event. Therefore, the EALs should be evaluated with respect to the intent of the criteria established for each emergency classification.

2. Downgrading the event would preclude an unnecessary activation or mobilization of plant, Federal, State, and local county response facilities and personnel.

3. Plant conditions are stable, and the prognosis for improvement is good.

4. Any fire, natural event or hazard to plant operations is under control or has ceased, and a preliminary assessment of the extent of damage has been completed.

5. Non-routine or abnormal releases of radioactive material to the environment are under control or terminated.

6. No protective actions for the general public are in effect, such as a precautionary shelter order.

7. Discussions have been held with the NRC, and State and local county officials, and an agreement has been reached to downgrade the event.

The concern is that downgrading the event may affect the plant's ability to support on-going State and local county emergency response activities which were initiated as a result of the classification of a Site Area Emergency.

5.3 **Event Termination/Recovery**

5.3.1 Terminate from any emergency class and enter into Recovery, if warranted or required, when the following criteria are met:

Entry into a Recovery phase and the establishment of a Recovery Organization is mandatory when terminating from a Site Area Emergency or General Emergency classification. Entry into Recovery from an Alert is optional.

1. The EAL entry criteria are no longer met for the event and for lower classifications.

----------OR----------

Plant long-term corrective action and/or clean-up activities resulting from the event, preclude exiting the EALs.

2. The reactor is in a stable condition, with a reliable means of long-term decay heat removal available, if required.

3. Containment integrity, if required, is maintained and not threatened.

4. Any fire, natural event (e.g., earthquake, high groundwater level), or hazard to plant operations (i.e., toxic gas, unusual aircraft activity) is under control or has ceased.

5. A preliminary assessment of the cause, extent of damage, and impact has been completed.

6. Radiation levels in affected plant areas are controllable or have decreased to within acceptable levels.

7. Areas of the plant affected by the emergency have been defined.

8. Non-routine or abnormal releases of radioactive material to the environment are under control or terminated.

AND

No further potential for a significant uncontrolled release exists.

9. No further surveillances relative to offsite protective actions are needed (except for the control of food stuffs, water, and offsite contamination or environmental assessment activities).

AND

Terminating the emergency will not impact any offsite protective actions which may be in progress.

10. Offsite radiological conditions do not prohibit or seriously restrict access of personnel and material to the Perry Plant site.

11. All pre-Recovery phase actions required by <EPI-A10> have been completed.

12. Consult with NRC, State of Ohio, and local county officials regarding the decision to terminate the emergency.

> The intent of this action is to involve the NRC, State and local counties in event decision-making; however, this action is not intended to delay or hinder the Perry Plant's ability to simultaneously classify and terminate from an Unusual Event or Alert.

5.4 Classification After the Event

5.4.1 Perform the following actions when it has been discovered that an Emergency Plan classification has been missed (during shift turnover, paperwork review, etc.), and the plant no longer meets the conditions of any EAL:

1. Classify the event, but do not implement the actions outlined in <EPI-A2>.

2. Notify the NRC within 1 hour of classification and initiate event investigation actions in accordance with <PAP-1604>.

3. Direct the on-call EPU Representative to inform the State of Ohio and local county Emergency Management Agencies (EMAs) using a commercial telephone; record the names and date/times of individuals contacted in the Plant Log.

   a. When a classification occurs during evening hours, calls to State and local EMAs can be deferred until next day at the discretion of the Shift Supervisor and on-call EPU Representative.

5.5 Staffing of Emergency Facilities for Non-Emergency Plan Events

The Shift Supervisor, based on his assessment of the situation can use the Emergency Response Organization (ERO) to mobilize and coordinate support for the Control Room staff. However, augmentation of staff shall be achieved using the Integrated On-Call Report whenever possible.

5.5.1 Announce the activation of the TSC, EOF, PIRT, JPIC, and/or OSC over the Plant Public Announcing (PA) System.

5.5.2 Mobilize required TSC, EOF, PIRT, JPIC and/or OSC staff by performing the following:

1. Select the appropriate message (#17 thru #23) on the ERO Pager Messages form (PNPP No. 9100) contained in <EPI-B1>.

2. Specify in the narrative summary block on the form: 1) that the facility activation is in response to a non-emergency plan event, and 2) brief summary of event conditions and support required.

3. Forward the completed form to the Secondary Alarm Station (SAS) and direct them to activate the Emergency Paging System ("beepers").

5.5.3 DO NOT perform any formal notifications to the NRC, State of Ohio, or local counties per <EPI-B1>.

NOTE: An informal notification to the State of Ohio and local counties may be performed by the On-Call Emergency Planning Representative after first consulting with the Shift Supervisor.

5.5.4 Upon the arrival of facility staff, coordinate activities in support of the Control Room's assessment and mitigation of the event; DO NOT ENTER <EPI-A2>, OR TRANSFER THE EMERGENCY COORDINATOR RESPONSIBILITIES OUTLINED IN SECTION 4.1 TO THE TSC.

5.5.5 Assess possible entry into the Emergency Plan per Section 5.1.6, and enter <EPI-A2> as applicable if the EAL criteria outlined in this instruction are met.

5.6 Records

5.6.1 Records Handling

1. The records generated by emergency response personnel will be collected and maintained by Emergency Planning Unit (EPU) pursuant to <EPI-B9>. The Emergency Records Package will be transferred to Records Management pursuant to <PAP-1701>.

5.6.2 Records Capture

The following records are generated by this document:

Quality Assurance Records

None

Non-Quality Records

None

INITIATING CONDITION INDEX

PNPP No. 8852 Rev. 11/30/00 EPI-A1

EVENT CATEGORY	MODE	UNUSUAL EVENT	MODE	ALERT	MODE	SITE AREA EMERGENCY	MODE	GENERAL EMERGENCY
A: FISSION PRODUCT BARRIER DEGRADATION	1 2 3 4 5	Fuel clad degradation Page 15 - AU1	1 2 3	Any loss or challenge to the Fuel Clad barrier. Page 18 (FPB Matrix) - AA1	1 2 3 4 5	Loss of RPV water level that has or will uncover fuel. Page 17 - AS1	1 2 3	Loss of two barriers, AND a loss or challenge to the third barrier. Page 18 (FPB Matrix) - AG1
	1 2 3	Reactor Coolant System leakage. Page 16 - AU2	1 2 3	Any loss or challenge to the Reactor Coolant System barrier. Page 18 (FPB Matrix) - AA2	1 2 3	Either a challenge or loss of both the Fuel Clad barrier AND Reactor Coolant System barrier. Page 18 (FPB Matrix) - AS2		
	1 2 3	Any loss or challenge to the Containment barrier. Page 18 (FPB Matrix) - AU3			1 2 3	Challenge to either the Fuel Clad barrier OR Reactor Coolant System barrier, AND the loss of any additional barrier. Page 18 (FPB Matrix) - AS3		
B: LOSS OF DECAY HEAT REMOVAL FUNCTIONS		NOT APPLICABLE	4 5	Inability to maintain plant in COLD SHUTDOWN Page 19 - BA1	1 2 3	Complete loss of functions needed to achieve COLD SHUTDOWN Page 20 - BS1		NOT APPLICABLE
C: LOSS OF SHUTDOWN FUNCTIONS OR FAILURE TO SHUTDOWN	1 2 3	Inability to reach required shutdown within Technical Specification limits Page 21 - CU1	1 2	Failure to initiate or complete an automatic Reactor Scram once an RPS function is required. Page 22 - CA1	1	Failure to initiate or complete an automatic Reactor Scram once an RPS function is required, AND a manual Scram was NOT successful. Page 23 - CS1	1	Failure to initiate or complete a successful shutdown, AND indication of an extreme challenge to the ability to cool the core. Page 25 - CG1
D: A.C. POWER LOSS	1 2 3 4 5 6	Loss of all offsite power to Division 1 and 2 EH Essential Busses for greater than 15 minutes. Page 27 - DU1	1 2 3	Power capability to Division 1 and 2 EH Essential Busses reduced to a single power source for greater than 15 minutes, such that any additional single failure would result in a Station Blackout. Page 28 - DA1	1 2 3	Loss of all offsite power AND onsite power to Division 1 and 2 EH Essential Busses for greater than 15 minutes. Page 30 - DS1	1 2 3	Prolonged loss of all offsite power AND onsite power to Division 1 and 2 EH Essential Busses, AND continuing degradation of core cooling capability. Page 31 - DG1
			1 4 5 6	Loss of all offsite power AND onsite power to Division 1 and 2 EH Essential Busses for greater than 15 minutes. Page 29 - DA2				
E: D.C. POWER DEGRADATION	4 5	Degradation of Division 1 and 2 essential DC power for greater than 15 minutes. Page 33 - EU1		NOT APPLICABLE	1 2 3	Degradation of Division 1 and 2 essential DC power for greater than 15 minutes. Page 34 - ES1		NOT APPLICABLE
F: FIRE OR EXPLOSION	1 2 3 4 5 6	Fire within a Safe Shutdown Building NOT extinguished within 15 minutes. Page 35 - FU1	1 2 3 4 5 6	Fire OR explosion affecting the operability of plant safety systems required to establish or maintain safe shutdown. Page 37 - FA1		NOT APPLICABLE		NOT APPLICABLE
	1 2 3 4 5 6	Explosion affecting a Safe Shutdown Building. Page 36 - FU2						
G: INCREASED PLANT RADIATION LEVELS	1 2 3 4 5 6	Unexpected increase in plant radiation levels. Page 39 - GU1	1 2 3 4 5 6	Increases in radiation levels within Safe Shutdown Buildings that impede operation of systems required to maintain safe operations OR to establish or maintain COLD SHUTDOWN. Page 41 - GA1		NOT APPLICABLE		NOT APPLICABLE
	1 2 3 4 5 6	Uncontrolled fuel pool water level decrease with irradiated fuel outside the RPV remaining covered. Pge 40 - GU2	1 2 3 4 5 6	Major damage to irradiated fuel. Page 42 - GA2				

INITIATING CONDITION INDEX

PNPP No. 8852 Rev. 11/30/00 EPI-A1

EVENT CATEGORY	MODE	UNUSUAL EVENT	MODE	ALERT	MODE	SITE AREA EMERGENCY	MODE	GENERAL EMERGENCY
H: INCREASED RADIATION RELEASE TO THE ENVIRONMENT	1 2 3 4 5 D	Any unplanned release of gaseous radioactivity to the environment that exceeds two times the ODCM Control limit for 60 minutes or greater. **Page 43 - HU1**	1 2 3 4 5 D	Any unplanned release of gaseous radioactivity to the environment that exceeds 200 times the ODCM Control limit for 15 minutes or greater. **Page 45 - HA1**	1 2 3 4 5 D	Site Boundary dose resulting from an actual or imminent release of gaseous radioactivity that exceeds 100 mRem TEDE dose OR 500 mRem CDE Child Thyroid dose for the actual OR projected duration of the release. **Page 47 - HS1**	1 2 3 4 5 D	Site Boundary dose resulting from an actual or imminent release of gaseous radioactivity that exceeds 1000 mRem TEDE OR 5000 mRem CDE Child Thyroid dose for the actual or projected duratio of the release. **Page 48 - HG1**
	1 2 3 4 5 D	Any unplannned release of liquid radioactivity to the environment that exceeds two times the ODCM Control limit for 60 minutes or greater. **Page 44 - HU2**	1 2 3 4 5 D	Any unplanned release of liquid radioactivity to the environment that exceeds 200 times the ODCM Control limit for 15 minutes or greater. **Page 46 - HA2**				
I: CONTROL ROOM EVACUATION		**NOT APPLICABLE**	1 2 3 4 5 D	Control Room Evacuation has been initiated. **Page 49 - IA1**	1 2 3 4 5 D	Control Room evacuation has been initiated, AND plant control<u>CANNOT</u> be established within 15 minutes. **Page 50 - IS1**		**NOT APPLICABLE**
J: LOSS OF ANNUNCIATORS OR INDICATIONS	1 2 3	Loss of most annunciators or indication in the Control Room for greater than 15 minutes. **Page 51 - JU1**	1 2 3	Loss of most annunciators or indication in the Control Room with<u>either</u>: (1) a significant transient in progress; OR (2) compensatory indications are<u>NOT</u> available. **Page 52 - JA1**	1 2 3	Inability to monitor a significant transient in progress. **Page 53 - JS1**		**NOT APPLICABLE**
K: LOSS OF COMMUNICATIONS	1 2 3 4 5 D	Loss of onsite OR in-plant communications capabilities. **Page 55 - KU1**		**NOT APPLICABLE**		**NOT APPLICABLE**		**NOT APPLICABLE**
	1 2 3 4 5 D	Significant degradation of offsite communications capabilities. **Page 56 - KU2**						
L: NATURAL OR DESTRUCTIVE PHENOMENA	1 2 3 4 5 D	Natural OR destructive phenomena affecting the Protected Area boundary. **Page 57 - LU1**	1 2 3 4 5 D	Natural OR destructive phenomena affecting Safe Shutdown Buildings. **Page 58 - LA1**		**NOT APPLICABLE**		**NOT APPLICABLE**
M: RELEASE OF TOXIC OR FLAMMABLE GAS	1 2 3 4 5 D	Release of toxic OR flammable gasses affecting the Protected Area boundary deemed detrimental to the safe operation of the plant. **Page 59 - MU1**	1 2 3 4 5 D	Release of toxic OR flammable gases within a Safe Shutdown Building which jeopardizes operation of systems required to maintain safe operations OR to establish or maintain COLD SHUTDOWN. **Page 60 - MA1**		**NOT APPLICABLE**		**NOT APPLICABLE**
N: SECURITY EVENTS	1 2 3 4 5 D	Confirmed security event which indicates a potential degradation in the level of safety of the plant. **Page 61 - NU1**	1 2 3 4 5 D	Security event in the plant Protected Area. **Page 62 - NA1**	1 2 3 4 5 D	Security event in a plant Vital Area. **Page 63 - NS1**	1 2 3 4 5 D	Security event resulting in loss of ability to reach and maintain COLD SHUTDOWN. **Page 64 - NG1**
O: EMERGENCY COORDINATOR'S JUDGEMENT	1 2 3 4 5 D	Other conditions existing, which in the judgement of the Emergency Coordinator, warrant declaration of an Unusual Event. **Page 65 - OU1**	1 2 3 4 5 D	Other conditions existing, which in the judgement of the Emergency Coordinator, warrant declaration of an Alert. **Page 66 - OA1**	1 2 3 4 5 D	Other conditions existing, which in the judgement of the Emergency Coordinator, warrant declaration of a Site Area Emergency. **Page 67 - OS1**	1 2 3 4 5 D	Other conditions existing, which in the judgement of the Emergency Coordinator, warrant declaration of a General Emergency. **Page 68 - OG1**

EAL ENTRY CRITERIA

Category K: Loss of Communications

Initiating Conditions	Entry Criteria
KU1 **Loss of onsite OR in-plant communications capabilities** **Applicable Modes:** **1 2 3 4 5 D**	Loss of all five Plant Public Address System channels.
	Loss of all of the following Plant Radio System channels: • Channel 1 • Channel 2 • Channel 3

KU1

UNUSUAL EVENT

EAL ENTRY CRITERIA

Initiating Conditions	Entry Criteria
	Loss of the State and County Notification Circuit (5-way) reported to the Control Room.
KU2 **Significant degradation of offsite communications capabilities**	Loss of offsite long distance calling capability on all of the following systems circuits for greater than 15 minutes: • Control Room private (259-) lines • Private Branch Exchange, Service Building ("5000") Switch • Private Branch Exchange, Warehouse Building ("6000") Switch • Company Off-Premise Exchange
Applicable Modes:	

1	2	3	4	5	D

KU2

UNUSUAL EVENT

NOTE

This EAL is intended to be used only when extraordinary means are being utilized to make communications possible. The radio link between the SAS/CAS and the Lake County Sheriff's Department, and use of cellular phones are considered extraordinary means and can be utilized outside the Control Room to provide notification capability upon the loss of dedicated and normal plant telephone lines.

A loss of the "5-Way" Circuit refers to the inability to contact one or more of the four offsite contacts: the State of Ohio, and the counties of Ashtabula, Geauga, and Lake.

FirstEnergy Nuclear Operating Company

PERRY NUCLEAR POWER PLANT

UNIT 1 & 2

ACKNOWLEDGMENT OF RECEIPT

Title Emergency Plan Implementing Instruction (EPI-A2), Rev. 7, C-4

Control No. 60

Letter No./Date PY-CEI/NRR-2564L / April 27, 2001

_____ _____

Signature Date

_____

Title

Return to:

Perry Nuclear Power Plant
Attn: Beverly Richardson, A240
P. O. Box 97
Perry, Ohio 44081

FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant

Controlled Document Instruction Sheet

Manual: Emergency Plan Implementing Instruction (EPI) for Perry Nuclear Power, EPI –A-0002, R/7, C-4

Control Number 60

Remove the pages listed below and insert enclosed pages:

Revision Number	Temporary Change No.	Insert	Remove
7	C-4	Entire Document	

The Cleveland Electric Illuminating Company

PERRY OPERATIONS MANUAL

Emergency Plan Implementing Instruction

TITLE: EMERGENCY ACTIONS BASED ON EVENT CLASSIFICATION

REVISION: 7 EFFECTIVE DATE: 4-21-97

PREPARED: Joseph D. Anderson 1-31-97
/ Date

EFFECTIVE PIC's

PIC No.	Type of Change	Effective Date
1	Intent	1-28-98
2	Intent	8-5-98
3	Intent	2-10-99
4	Non-Intent	4-4-01

EMERGENCY ACTIONS BASED ON EVENT CLASSIFICATION

Table of Contents

SCOPE OF REVISION:

Periodic Review - Required

Rev. 7 - 1. Consolidates the following ERO response instructions into a common instruction and retitles instruction accordingly:

- o EPI-A2, "Unusual Event"
- o EPI-A3, "Alert"
- o EPI-A4, "Site Area Emergency"
- o EPI-A5, "General Emergency"

2. Addresses NRC Site Team and federal response under "Follow-up Actions".

Change History

PIC Number: 1 Affected Pages: i, iii, 12, 13, 14

Summary of Change:
1. Revises Event Classification Checklist (Attachment 1) to insert under Item #5 (NOTE) the "Activation of ERO pages are NOT required if TSC, OSC and EOF have already been activated."
2. To correct various typographical/grammar errors.

PIC Number: 2 Affected Pages: i, iii, 5, 5a, 7, 8, 9, 10, 12, 13, 14

Summary of Change:
1. Addresses the required activation of the Public Information Response Team (PIRT) at an ALERT classification and optional activation at an UNUSUAL EVENT.
2. Clarifies requirement for activation of ERO pagers when simultaneously classifying and terminating from an Unusual Event.
3. Replaces American Nuclear Insurers (ANI) with Nuclear Electric Insurance Limited (NEIL) for notification of insurance provider.
4. Directs the activation of the EOF and JPIC in support of an NRC Site Team response.
5. Deletes requirement for EPU to generate and distribute a post-event close out summary to the State of Ohio and local counties.

PIC Number: 3 Affected Pages: i, iii, 8, 12, 13, 14

Summary of Change:
1. Addresses the limited mobilization of Davis-Besse ERO under Corporate Nuclear Emergency Response Plan to assist in coordinating logistical support within Company and with external points of contact.

PIC Number: 4 Affected Pages: i, iii, 2, 3, 4, 5, 5a, 9, 12, 13, 14

Summary of Change:
1. Corrected all discussions of Corporate Emergency Response to reflect Policy/Procedure TECH-11, FirstEnergy Corporate Emergency Response Plan.
2. Changed references from PAP-1608 to NOP-LP-2001, "Condition Report Program".
3. Added initial PARs and PAR changes to list of when an Initial Notification is required.
4. Added a NOTE in the Personnel Accountability section stating that personnel safety issues may delay implementation of accountability.
5. Corrected various typos.
6. Corrected Event Classification Checklist to add note regarding site accountability, correct reference from PAP-1608 to PAP-1604, and listed the EOF and JPIC as optional facilities that could be activated during an Unusual Event.

EMERGENCY ACTIONS BASED ON EVENT CLASSIFICATION

1.0 PURPOSE

This instruction describes both pre-planned immediate and supplementary actions to be taken for an emergency condition which has been classified by the Emergency Coordinator per <EPI-A1>.

Once implemented, this instruction remains in effect until the emergency event is terminated and recovery entered per <EPI-A1>.

2.0 REFERENCES

2.1 Source References:

1. NUREG-0654: "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants"
2. Emergency Plan for PNPP Docket Nos. 50-440, 50-441

2.2 Use References:

1. Emergency Plan Implementing Instruction (EPI) A1: "Emergency Action Levels"
2. Emergency Plan Implementing Instruction (EPI) A6: "Technical Support Center Activation"
3. Emergency Plan Implementing Instruction (EPI) A7: "Operations Support Center Activation"
4. Emergency Plan Implementing Instruction (EPI) A8: "Emergency Operations Facility Activation"
5. Emergency Plan Implementing Instruction (EPI) A10: "Recovery"
6. Emergency Plan Implementing Instruction (EPI) A11: "Activation of the Backup Emergency Operations Facility"
7. Emergency Plan Implementing Instruction (EPI) B1: "Emergency Notification System"
8. Emergency Plan Implementing Instruction (EPI) B5: "Personnel Accountability/Site Evacuation"
9. Emergency Plan Implementing Instruction (EPI) B8: "Protective Actions and Guides"
10. Emergency Plan Implementing Instruction (EPI) B9: "Emergency Records"

11. Plant Administrative Procedure (PAP) 1701: "Records Management Program"

12. Code of Federal Regulations, 10CFR0.72: "Immediate Notification Requirements for operating Nuclear Power Reactors"

13. Plant Administrative Procedure (PAP) 1604: "Reports Management"

14. Nuclear Operating Procedure (NOP) LP-2001: "Condition Report Program"

15. U.S. Nuclear Regulatory Commission (NRC) Response Coordination Manual (RCM), 1996

16. TECH-11: FirstEnergy Corporate Emergency Response Plan for Davis Besse Nuclear Power Station and Perry Nuclear Power Plant

17. Emergency Plan (EP)

18. Commitments addressed in this document:

B00962 P00035 P00040
P00004 P00037

3.0 DEFINITIONS

3.1 Corporate Planning Center (CPC)

An area located at the unaffected FirstEnergy nuclear station/plant, which is mobilized to assist in the coordination of Corporate emergency response activities in support of the affected station/plant. At Davis Besse, the CPC is located in the Emergency Control Center (ECC) at the on-site Administration Building. At Perry, the CPC is located in the Emergency Operations Facility (EOF).

4.0 RESPONSIBILITIES

4.1 **Emergency Coordinator** <P00035> <P00040>

The Emergency Coordinator shall not delegate the responsibilities designated by an asterisk (*).

*1. Direct the notification of offsite agencies and organizations.

2. Direct the activation and deactivation of the designated Emergency Response Facilities, and the notification of required Emergency Response Organization (ERO) personnel.

*3. Determine the emergency classification including reclassification or termination.

*4. Recommend protective actions for the general public to State and local County Officials.

5. Coordinate and direct the actions necessary to terminate or mitigate the effects of the emergency.

6. Provide an interface with FirstEnergy Corporation organizational management and senior levels of outside organizations.

7. Provide information and assistance to the Public Information Organization, as appropriate.

8. Perform the actions of the Emergency Coordinator, as outlined in <EPI-A8>, in support of the activation and operation of the Emergency Operations Facility (EOF).

9. Request limited mobilization of the Davis-Besse ERO per the <Corporate Nuclear Emergency Response Plan> for events classified at a Site Area Emergency or above per <EPI-A1>. Discretionary mobilization of the Davis-Besse ERO is permissible at the Alert level.

4.2 **TSC Operations Manager**

1. Identify ERO repair and assessment priorities based on event conditions and plant status.

2. Coordinate the combined activities of Technical Support Center (TSC) and Operations Support Center (OSC) personnel based on established priorities.

3. Direct the OSC activities in support of the Control Room through the TSC Maintenance Coordinator.

4. Perform the actions of the Operations Manager as outlined in <EPI-A6>, in support of TSC activation and operation.

5. In the event the EOF is not operational, assume the responsibilities of the Emergency Coordinator.

4.3 **Shift Supervisor**

1. Initially classify an emergency event based on criteria set forth in <EPI-A1>, and assume the position of Emergency Coordinator.

2. Direct the shift operating staff and augmentation of the shift staff, if required.

3. Activate and direct the Fire Brigade and First Aid Team (FAT), as necessary.

4. Continuously assess plant conditions and recommend changes in the emergency classification and ERO task priorities to the Operations Manager and Emergency Coordinator.

5. Transfer Emergency Coordinator responsibilities to the TSC Operations Manager or EOF Emergency Coordinator when their respective facility is operational at Alert classification or above.

5.0 ACTIONS

5.1 Immediate Actions

5.1.1 **Emergency Coordinator:**

1. Use the Event Classification Checklist (PNPP No. 7983, Attachment 1) to initiate and document the completion of required actions.

2. Perform the Immediate Actions specified on Page 1 of 3 to the Event Classification Checklist, which include:

   a. Direct the initial notification of the State of Ohio and Counties of Ashtabula, Geauga, and Lake within 15 minutes of event classification, reclassification, Protective Action Recommendation (PAR), PAR change, or termination/recovery per <EPI-B1>, and the Nuclear Regulatory Commission (NRC) immediately following the notification of the State of Ohio and local counties but within one hour.

      1) **For events classified as a General Emergency**, ensure the initial notification includes at a minimum the following protective action recommendation (PAR) per <EPI-B8> based on wind direction (FROM): <P00037>

WIND DIRECTION - **"FROM"** (in degrees)	AFFECTED SUBAREAS
102 to 213	EVACUATE 1 & Lake
214 to 281	EVACUATE 1, 2 & Lake
282 to 11	EVACUATE 1, 2 & 3
12 to 33	EVACUATE 1 & 3
34 to 101	EVACUATE 1, 3 & Lake

NOTE 1: Do not delay recommending this default protective action for a General Emergency to perform detailed dose assessment calculations.

NOTE 2: The completed Initial Notification form (PNPP No. 7794) should be approved and forwarded to facility communicator(s) within 10 minutes of the event classification or reclassification.

b. Activate required emergency response facilities per the Event Classification Checklist.

-- If plant conditions or an on-going security event restrict or render one or more facilities inaccessible, direct the relocation of the EOF, and TSC/OSC, as required. <B00962>

- Onsite EOF → Backup EOF at ASSC
- TSC (603' SB) → Onsite EOF
- OSC (599' CCB) → Unit 2 Control Room

NOTE: Portable radios and/or cellular phones can not be used within the Unit 1/2 Control Rooms.

c. Mobilize required Emergency Response Organization (ERO) personnel using a Pager Message form (PNPP No. 9100) contained in <EPI-B1>, and forward to the Secondary Alarm Station (SAS).

NOTE: Activation of ERO pagers is NOT needed if:
- facilities required based on event classification or Emergency Coordinator judgment have already been/are being mobilized, or
- simultaneously classifying and terminating from an Unusual Event.

1) When the TSC is operational, direct the Security Coordinator to draft the pager message, and forward to the SAS, when approved.

d. At a Site Area Emergency classification or above, initiate personnel accountability per <EPI-B5>, and evaluate the following considerations:

NOTE: It may be prudent to delay implementation of accountability in situations where personnel safety could be jeopardized, such as a security event or severe weather.

1) For a significant offsite radiological release, determine if evacuating personnel should be directed to offsite monitoring/decontamination centers.

2) For an on-going Security event, determine if additional guidance should be issued regarding evacuation routes. <B00962>

e. Verify that required notifications and/or requests to offsite emergency support agencies (i.e., fire, ambulance, hospital) have been completed by the SAS.

f. Verify that an individual knowledgeable in system operations is assigned to answer NRC questions and inquiries over Emergency Notification System (ENS) circuit when an open line is established.

NOTE: Responsibility for manning open ENS line will be transferred to and maintained in the TSC.

5.2 Follow-Up Actions

5.2.1 Emergency Coordinator:

1. Perform the Follow-Up Actions specified on Page 2 of 3 to the Event Classification Checklist, which include:

   a. Verify the completion of initial notifications to the State of Ohio, local counties, and the NRC.

   b. Verify the completion of notifications to on-call ERO personnel.

   c. Ensure that initial accountability results are obtained and search and rescue efforts initiated to locate unaccounted for personnel.

      NOTE: All unaccounted for personnel, inside the Protected Area must be identified by name within 30 minutes of initiating personnel accountability and the Shift Supervisor notified of the number of unaccounted for people.

   d. **For events classified as a General Emergency,** direct that a dose projection be performed to verify offsite doses and to determine the need to upgrade offsite PAR per <EPI-B8>.

      1) If an PAR upgrade is warranted based on projected or actual offsite dose, direct the completion of an initial notification per Section 5.1.1.2.a.

   e. Direct a follow-up notification to the State of Ohio, Counties of Ashtabula, Geauga and Lake, and the NRC within 60 minutes of event classification, reclassification, or decision to upgrade offsite PAR per <EPI-B1>.

      NOTE: The completed Follow-up Notification form (PNPP No. 7795) should be approved and forwarded to facility communicator(s) within 50 minutes of the event declaration or decision to upgrade PAR.

   f. If the OSC is being activated but NOT yet operational, perform the following actions per <EPI-A7>:

      1) When the designated OSC Coordinator is not present, appoint an interim OSC Coordinator from supervisors available in OSC.

      2) Once the facility is declared operational, relocate the Operations Foreman and Perry Plant Operators (PPOs)/Perry Plant Attendants (PPAs) to the OSC.

3) Until the TSC is declared operational, direct the dispatching of OSC team(s) and personnel in response to the event through the OSC Coordinator per <EPI-A7>.

g. If the TSC is being activated but NOT yet operational, perform the following actions per <EPI-A6>:

1) **For events classified as an Alert or above** when the TSC is declared operational, transfer the non-delegatable Emergency Coordinator duties to the TSC.

NOTE: Per <EPI-A1>, event must be escalated to an Alert if, Emergency Coordinator duties are transferred out of Control Room at Unusual Event classification.

2) When necessary to expedite the transfer of offsite notification responsibilities, relocate Control Room Communicators to TSC.

h. Verify proper event classification using <EPI-A1>.

1) Initiate a new Event Classification Checklist if classification is changed.

2) Proceed to Section 5.3 if event is to be terminated.

i. Direct the periodic notification of the Institute of Nuclear Power Operations (INPO) and Nuclear Electric Insurance Limited (NEIL) per <EPI-B1> using the Industry Event Notification form (PNPP No. 9596).

NOTE: Notifications to these or any other support organization do not take precedence over required initial and/or follow-up notifications to the State of Ohio, local counties, and the NRC, and should be deferred until the TSC is operational.

1) Use the Industry Event Notification form to request the following assistance from INPO:

- Facilitating technical information flow to the nuclear industry by maintaining the NUCLEAR NETWORK.
- Dispatching an INPO Liaison to the affected plant/utility to facilitate utility interface with INPO and its industry resources.

- o Locating replacement equipment and/or industry personnel with special technical expertise.

NOTE: Responsibility for periodically updating INPO will be transferred to EOF when operational. However, the TSC Plant Technical Engineer will continue to serve as the point of contact for all requests through INPO for industry assistance.

2) Suspend periodic updates to INPO and direct requests for Industry assistance through the INPO Liaison upon arrival, if requested.

j. Verify completion of follow-up notifications to the State of Ohio, local counties and the NRC, and updates to INPO and NEIL. Establish a schedule for periodic follow-up notifications to the State of Ohio, local counties, and NRC.

NOTE: Periodic follow-up notifications should be performed on approximately an hourly basis. However, the frequency of these notifications can be reduced based on the mutual consent of all parties.

k. Once the EOF is declared operational, transfer the non-delegatable Emergency Coordinator duties to the EOF.

l. Determine the need for additional facilities, and announce their activation as warranted using the Plant PA System and by completing and forwarding a Pager Message form to the SAS.

m. **For events classified as Site Area Emergency or at the Emergency Coordinator's discretion,** contact the Davis-Besse on-call Emergency Off-Site Manager (EOM), per the instructions provided in the ERO Telephone Directory. Request the limited mobilization of the Davis-Besse ERO per the <Corporate Nuclear Emergency Response Plan> to assist in coordinating logistical support within the Company and with external sources.

2. When the onsite EOF becomes uninhabitable due to radiological concerns, direct the activation of the Backup EOF per <EPI-A11>.

3. When an elevated or unmonitored release has occurred, direct the performance of offsite dose calculations.

a. Transmit changes to protective actions for the general public to the State of Ohio, local counties, and the NRC using an Initial Notification form per Section 5.1.1.4 within 15 minutes of approving PAR change.

b. Direct a follow-up notification to the State of Ohio, local counties, and NRC per Section 5.2.1.7 within 1 hour of approving PAR change.

4. Provide assistance to the on-call Media Relations Representative or Information Liaison; review and approve Company news statements prepared by the Public Information Response Team (PIRT) or Joint Public Information Center (JPIC).

5. Ensure the onsite emergency facilities and Joint Public Information Center (JPIC) are advised of the dispatching of an NRC Site Team when notified over the ENS Circuit, and that measures are taken to brief team members and expedite entry into the Protected Area.

NOTE: The NRC Operations Center in White Flint, MD, will take the lead in interfacing with the licensee during the "monitoring/standby modes" and prior to the arrival of the NRC Site Team and establishment of a Director of Site Operations.

a. If not yet mobilized, direct the activation of EOF and JPIC to support NRC Site Team response per the NRC Response Coordination Manual (RCM).

6. For events involving a Federal response due to a significant offsite radiological release, ensure an interface is established with the Federal Response Center (FRC) and Federal Radiological Monitoring and Assessment Center (FRMAC).

NOTE: Per the Federal Radiological Emergency Response Plan (FRERP), the NRC will serve as the Lead Federal Agency (LFA) and the U.S. Department of Energy (DOE) will coordinate offsite monitoring and assessment activities at the FRMAC. Refer to the NRC Response Coordination Manual (RCM) for specific details on Federal response capabilities and agency responsibilities and interfaces.

7. Continue to assess the emergency conditions and when significant changes in the emergency situation occur, verify the correct emergency classification in accordance with <EPI-A1> and reclassify the event appropriately.

a. If conditions for an event classification are no longer met, refer to Section 5.3 of this instruction.

5.3 Emergency Termination/Deactivation

5.3.1 **Emergency Coordinator:**

1. Event termination or recovery criteria outlined in <EPI-A1> has been reviewed and criteria met.

2. Identify equipment, systems, and components to be quarantined, and establish measures to implement quarantine.

3. Establish a Recovery Organization in accordance with <EPI-A10>, and implement an Incident Response Team (IRT) as required by <PAP-1608>.

4. **For events classified as an Alert or above,** the NRC, State of Ohio, and local counties have been consulted regarding event termination.

5. Announce the termination of the emergency (twice) on the Plant PA System.

6. Provide an initial notification of the emergency termination and entry into the Recovery Phase to the State of Ohio, local counties, and the NRC, using the Initial Notification form per Section 5.1.1.2.a.

7. Notify INPO and NEIL of the event termination and entry into the Recovery Phase using an Industry Event Notification form.

8. **At the Emergency Coordinator's discretion,** notify on-call ERO personnel of the event termination using a Pager Message form.

   NOTE: NOT required if simultaneously classifying and terminating from an Unusual event.

9. Evaluate and compile conditions requiring entry into <10CFR50.72>. Report these conditions to the NRC over the ENS circuit utilizing an Event Notification form (PNPP No. 6912) per <PAP-1604>.

   NOTE: Termination of the event should not be delayed to perform this action.

10. Coordinate the deactivation of the OSC, TSC, and/or EOF as appropriate.

11. Verify that notification of event termination to the State of Ohio, local counties, NRC, INPO, and NEIL have been completed.

5.4 Records

5.4.1 Records Handling

1. The records generated by emergency response personnel will be collected and maintained by EPU pursuant to <EPI-B9>. The Emergency Records Package will be transferred to Records Management pursuant to <PAP-1701> under Record Type 9J100.

5.4.2 Records Capture

The following records are generated by this document:

Quality Assurance Records

Event Classification Checklist (PNPP No. 7983)

Non-Quality Records

None

EVENT CLASSIFICATION CHECKLIST

PNPP No. 7983 Rev. 12/14/00 EPI-A2

Event classified as a/an: ☐Unusual Event ☐Alert ☐Site Area Emergency ☐General Emergency at _____ on __/__/__.

Checklist completed by: _____ (Shift Supervisor/TSC Operations Manager/ Emergency Coordinator)

A. IMMEDIATE ACTIONS | INITIALS | TIME

1. Announce event classification and reason for declaring emergency over the Plant PA System. Sound Plant Emergency Alarm if event classified from the Control Room.

2. **[CONTROL ROOM ONLY]** Call two shift I&C technicians to Control Room as communicators. NOTE: CRA may also serve as a Control Room Communicator.

3. Complete an Initial Notification form (PNPP No. 7794), approve, and forward to communicators within 10 minutes of decision to classify event or upgrade offsite PAR. NOTE: **For a GENERAL EMERGENCY**, ensure that at a minimum the default PAR, as outlined in Section 5.1.1.2 of EPI-A2, is included.

4a. Determine facilities to be activated using table below: (R-required; O-optional)

Classification/Facility	OSC	TSC	PIRT	EOF	JPIC
Unusual Event	O	O	O	O	O
Alert	R	R	R	O	O
Site Area Emergency	R	R	R	R	R
General Emergency	R	R	R	R	R

4b. Are needed facilities already in operation and available/accessible?

	Not Required	In Operation/ Mobilizing	Not Available/ Accessible	Alternate Location
OSC	☐	☐	☐	Unit 2 Control Room
TSC	☐	☐	☐	Onsite EOF
EOF	☐	☐	☐	Ashtabula Service Center
PIRT	☐	☐	☐	Not Applicable
JPIC	☐	☐	☐	Not Applicable

4c. Announce activation of facilities to be activated over the Plant PA System.

5. Complete the Pager Messages form (PNPP No. 9100), approve, and forward immediately to the SAS.
NOTE: (1) Completion of form is delegated to the Security Coordinator once TSC is operational. (2) Activation of ERO pagers are NOT needed if required facilities have already been/are being mobilized OR simultaneously classifying and terminating from an Unusual Event.

6. **[SITE AREA EMERGENCY or above]** Initiate personnel accountability per EPI-B5, if not yet implemented: ☐ Not Required
NOTE: It may be prudent to delay implementation of accountability in situations where personnel safety could be jeopardized, such as a security event or severe weather.

6a. Direct Shift Supervisor to initiate appropriate "Emergency" message over the Exclusion Area Paging System, and use PA feature to provide further guidance on offsite assembly if required.

7. Verify that notifications and/or requests for offsite support were completed by the SAS:
   a. Fire Department (911) ☐ Not Required
   b. Ambulance (911) ☐ Not Required
   c. Hospital: Primary - Lake East; Backup - Lake West ☐ Not Required

8. Verify that an individual knowledgeable in system operations is assigned to the NRC ENS Circuit to answer questions and inquiries when an open line is established.

COMMENTS:

REFER TO PAGE 2 OF 3 FOR LISTING OF FOLLOW-UP ACTIONS

EVENT CLASSIFICATION CHECKLIST

PNPP No. 7983 Rev. 12/14/00 EPI-A2

B. FOLLOW-UP ACTIONS	INITIALS	TIME
1. Verify completion of initial notifications: ☐ State of Ohio ☐ Geauga County ☐ Ashtabula County ☐ Lake County ☐ Nuclear Regulatory Commission (NRC)		
2. On-call ERO notifications completed at _____ hours.		
3. Personnel accountability completed at _____ hours. No. unaccounted for:_____.		
4. **[GENERAL EMERGENCY ONLY]** Direct that a dose projection be performed to verify offsite doses and to determine the need to upgrade offsite PARs per EPI-B8. - If a PAR upgrade is required, use an Initial Notification form (PNPP No. 7794) to advise offsite agencies per Step 3 under "Immediate Actions."		
5. Direct completion of a Follow-up Notification form (PNPP No. 7795), approve, and forward to Communicators within 50 minutes of event classification or decision to upgrade PARs.		
6. **OSC IN THE PROCESS OF BEING ACTIVATED.** ☐ Not applicable; proceed to Step 7.		
6a. Determine status of OSC activation, and appoint an interim OSC Coordinator if needed.		
6b. When OSC declared operational, relocate Operations Foreman and PPOs/PPAs to OSC.		
7. **TSC IN THE PROCESS OF BEING ACTIVATED.** ☐ Not applicable; proceed to Step 8.		
7a. **[ALERT OR ABOVE ONLY]** Non-delegatable Emergency Coordinator duties transferred to the TSC: (1) Event Classification at _____ hours. (2) Protective Action Recommendations (PARs) at _____ hours. (3) Offsite Notifications at _____ hours.		
7b. When requested, relocate Control Room Communicators to TSC to expedite the transfer of offsite notification responsibilities.		
8. Verify proper event classification using EPI-A1. If event classification is changed, start a new Event Classification Checklist.		
9. **[ALERT OR ABOVE ONLY]** Direct the periodic notification of INPO and NEIL using an Industry Event Notification form (PNPP No. 9596).		
10. Verify completion of first follow-up notification, and establish a schedule for subsequent periodic notifications. NOTE: Periodic follow-up notifications are to be performed on an approximately hourly basis, unless alternate schedule established with approval of offsite agency(ies). ☐ State of Ohio ☐ Geauga County ☐ Ashtabula County ☐ Lake County ☐ NRC ☐ NEIL / ☐ Not Applicable ☐ INPO / ☐ Not Applicable		
11. Non-delegatable Emergency Coordinator duties transferred to the EOF: ☐ NA (1) Event Classification at _____ hours. (2) Protective Action Recommendations (PARs) at _____ hours. (3) Offsite Notifications at _____ hours.		
12. Determine the need for additional emergency facilities. ☐ Not Required, or ☐ as indicated: ☐ OSC ☐ TSC ☐ EOF/BEOF ☐ PIRT ☐ JPIC		
13. **[SITE AREA EMERGENCY OR @ EMERGENCY COORDINATOR DISCRETION]** Contact the Davis-Besse on-call Emergency Off-site Manager, per the instructions provided in ERO Telephone directory, and request mobilization of the Davis-Besse ERO to assist in coordinating Corporate or external support for event per the Corporate Response Plan.		
14. Review FOLLOW-UP ACTIONS listed in Section 5.2 of EPI-A2, Steps 2 thru 7, and perform as applicable.		

REFER TO PAGE 3 OF 3 FOR EVENT TERMINATION ACTIONS

EVENT CLASSIFICATION CHECKLIST

PNPP No. 7983 Rev. 12/14/00

EPI-A2

C. EVENT TERMINATION ACTIONS	INITIALS	TIME
1. Termination criteria in EPI-A1 reviewed and criteria met.		
2. Identify equipment, systems and components to be quarantined, and establish measures to implement quarantine.		
3. Recovery Organization established as required by EPI-A10. ☐ Not Applicable		
4. **[ALERT OR ABOVE ONLY]** NRC, State of Ohio, and local counties consulted regarding the decision to terminate the emergency. NOTE: Decision to terminate is a PNPP responsibility.		
5. Decision made to terminate event at ____ hours (Date / /)		
6. Announce event termination over the Plant PA System.		
7. Complete an Initial Notification form (PNPP No. 7794), approve, and forward to communicators within 10 minutes of event termination.		
8. **[ALERT OR ABOVE]** Notify INPO and NEIL of the termination of event using an Industry Event Notification form (PNPP No. 9596).		
9. **[At the Emergency Coordinator's discretion]** Complete the Pager Messages form (PNPP No. 9100), approve, and forward immediately to the SAS. ☐ Not Applicable NOTE: NOT required if simultaneously classifying and terminating from an Unusual Event.		
10. Evaluate and compile conditions requiring a notification under 10CFR50.72, and report to the NRC per PAP-1604.		
11. Coordinate facility deactivation: OSC at hours — PIRT at _____ hours TSC at hours — EOF at _____ hours JPIC at _____ hours		
12. Verify completion of offsite notifications: ☐ State of Ohio ☐ Geauga County ☐ Ashtabula County ☐ Lake County ☐ Nuclear Regulatory Commission (NRC) ☐ INPO / ☐ Not Applicable ☐ NEIL / ☐ Not Applicable		

COMMENTS:

FirstEnergy Nuclear Operating Company

PERRY NUCLEAR POWER PLANT

UNIT 1 & 2

ACKNOWLEDGMENT OF RECEIPT

Title Emergency Plan Implementing Instruction (EPI-A6), Rev. 10 C-4

Control No. 60

Letter No./Date PY-CEI/NRR-2564L / April 27, 2001

_____ _____

Signature Date

_____

Title

Return to:

Perry Nuclear Power Plant
Attn: Beverly Richardson, A240
P. O. Box 97
Perry, Ohio 44081

FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant

Controlled Document Instruction Sheet

Manual: Emergency Plan Implementing Instruction (EPI) for Perry Nuclear Power, EPI –A-0006, R/10, C-4

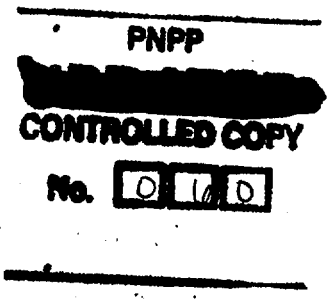
Control Number 60

Remove the pages listed below and insert enclosed pages:

Revision Number	Temporary Change No.	Insert	Remove
10	C-4	Entire Document	

The Cleveland Electric Illuminating Company

PERRY OPERATIONS MANUAL



Emergency Plan Implementing Instruction

TITLE: TECHNICAL SUPPORT CENTER ACTIVATION

INFORMATION ONLY

REVISION: 10 EFFECTIVE DATE: 3-20-95

PREPARED: Joseph D. Anderson 11-15-94
/ Date

EFFECTIVE PIC's

PIC No.	Type of Change	Effective Date
1	Intent	5-29-96
2	Intent	4-21-97
3	Admin	10-9-00
4	Admin	4-4-01

TECHNICAL SUPPORT CENTER ACTIVATION

Table of Contents

SCOPE OF REVISION:

Rev. 10 - 1. Designates Operations Advisor as interim Operations Manager, and authorizes interim Ops. Mgr. to assume Emergency Coordinator duties from CR Shift Supervisor.
2. Identifies Plant Technical Engineer as the point of contact for INPO and other Industry technical support organizations.
3. Revises title of Security Supervisor to SNSO.
4. Incorporates responsibilities and actions for the Regulatory Affairs Coordinator, as an on-call TSC position.
5. Clarified actions for coordinating transfer of Emergency Coordinator duties to the EOF.
6. Restructured Ops. Manager actions for declaring TSC operational.
7. Remove HPN Circuit as a Communicator duty; available HP technician to be assigned to circuit by RPC/RPA if opened.
8. EPI-B1 referenced for all offsite notification actions.
9. Dose Assessor and Rad. Prot. Assistant expected actions clarified under Rad. Prot. Coordinator.
10. Operating instructions for the NRC ENS Ckt. remote headset inserted as Attachment 3.
11. Actions revised to have Security Coordinator to direct that access control be established once the TSC is operational.
12. Deleted reference under Security Coord. to multiple pager message forms; single composite form being implemented.
13. Access Controller actions deleted; covered under SPI-0023.
14. Inserts record capture statement.

Change History

PIC Number: 1 Affected Pages: ii, 1, 2, 4, 6, 7, 8, 9, 9a, 10, 12, 13, 14, 15, 16, 18, 19, 20, 21, 22, 23, 24, 27, 28, 32, 33, 35

Summary of Change:

1. Addresses the quarantining of plant equipment/components. [PMATS EP-95-19].
2. Deletes attachment providing instructions on use of ENS remote headset, and references Emergency Response Telephone Directory for instructions.
3. References updated; statements reworded to address NOTES and "IF" statements directing action; references to specific sections in other procedures/instructions were deleted.
4. Responsibility for directing the shifting of the TSC HVAC modes transferred to the TSC Maintenance Coordinator.
5. Discussion on TSC activation/response goal expanded under TSC Operations Manager.
6. TSC Operations Manager "activation" actions revised to: designate minimum TSC staffing to declare facility operational, and separate actions for declaring the TSC operational and for the transfer of Emergency Coordinator duties.
7. TSC Administrative Assistant "activation" actions revised to streamline actions, address callout of TSC Communicators, and eliminate the TSC Records Room clerical position.
8. Inserts reference to GE BWR Emergency Support Program (SIL No. 324) and use of Industry Event Notification Form (re: INPO) under the TSC Plant Technical Engineer.
9. Addresses the dispatching of CEI State Liaison at a Site Area Emergency by the Regulatory Affairs Coordinator.
10. TSC Activation Checklist revised to address text changes and user comments.
11. Alternate TSC Layout Figure (Attachment 2) revised to reflect Regulatory Affairs Coordinator position.
12. Specifies TSC Radiation Protection Coordinator responsibility for plant Chemistry activities, including core damage assessment, through the OSC Chemistry Supervisor or TSC Dose Assessor. [EP-96-11]

PIC Number: 2 Affected Pages: i, iii, iv, v, 2, 3, 4, 6, 9, 11, 12, 13, 14, 16, 17, 18, 20, 21, 22, 23, 25, 26, 27, 28, 29, 32, 33

Summary of Change:

1. Addresses the elimination of TSC Access Control Point, including the use of TSC "accountability" card reader as part of facility staffing and issuance of dosimetry by Radiation Protection Coordinator per HPI-B0003.
2. Revises Regulatory Affairs Coordinator actions to discuss with the State of Ohio and determine the need to dispatch a CEI Liaison prior to a Site Area Emergency.
3. Clarifies actions performed by the TSC Radiation Protection Coordinator and TSC Operations Advisor which are not required prior to the Alert declaration. [PIFRA No. 96-3766-002]

Change History (Cont.)

PIC Number: 2

Summary of Change (Cont.):

4. Inserts statement, where applicable, regarding PAP-0224 FFD requirements for call-ins. [PIF No. 96-3794]
5. Deleted reference to ANSI-qualified technician as Dose Assessor.
6. Reference inserted for Commitment B01028.
7. Various sections reworded/organized to clarify instructions. However, no new responsibilities/actions were created or deleted other than those listed above.

PIC Number: 3 Affected Pages: i, iv, v, 2, 12, 14, 16, 17, 18, 20, 22, 28, 29

Summary of Change:

1. Changing references to PAP-0224 to NOP-LP-1002.

PIC Number: 4 Affected Pages: i, v, 1, 2, 3, 4, 6, 7, 9a, 10, 11, 12, 13, 14, 16, 17, 18, 19, 20, 22, 25, 26, 28, 29, 32, 33, 34, 35

Summary of Change:

1. Deletes Reference to EPI's A3, -A4 and A5 which were consolidated into and superseded by EPI-A2.
2. Changed reference from CEI to FirstEnergy.
3. Replaced reference to PAP-0514 with HPI-B0003.
4. Replaced the Emergency Response Information System (ERIS) with Integrated Computer System (ICS).
5. Health Physics and HP were replaced with Radiation Protection and RP as appropriate. CRRA-00-1159-001 with a 12/14/00 due date mandates these changes.

TECHNICAL SUPPORT CENTER ACTIVATION

1.0 PURPOSE

This instruction describes the activation and operation of the Technical Support Center (TSC), and delineates the responsibilities of designated TSC personnel.

The TSC will be activated for an Alert or higher classification, or at the direction of the Shift Supervisor, serving as Emergency Coordinator.

2.0 REFERENCES

2.1 Source References:

1. Emergency Plan for PNPP Docket Nos. 50-440, 50-441

2.2 Use References:

1. Emergency Plan Implementing Instruction (EPI) B1: "Emergency Notification System"
2. Health Physics Instruction (HPI) B0003: "Processing Of Personnel Dosimetry"
3. Emergency Plan Implementing Instruction (EPI) A1: "Emergency Action Levels"
4. Emergency Plan Implementing Instruction (EPI) A2: "Emergency Actions Based On Event Classification"
5. Emergency Plan Implementing Instruction (EPI) B8: "Protective Action and Guides"
6. Emergency Plan Implementing Instruction (EPI) B5: "Personnel Accountability/Site Evacuation"
7. Plant Administrative Procedure (PAP) 0103: "Plant Operations Review Committee"

8. Emergency Plan Implementing Instruction (EPI) B9: "Emergency Records"

9. Emergency Response Telephone Directory

10. System Operating Instruction (SOI) M52: "Technical Support Center Ventilation System"

11. Preparedness Support Instruction (PSI) 0007: "Reporting Emergency Plan-Related Communications Equipment Problems"

12. Physical Security Plan

13. System Operating Instruction (SOI) D19: "Post Accident Radiation Monitoring System"

14. Emergency Plan Implementing Instruction (EPI) B3: "Radiological Surveys for Emergencies"

15. Emergency Plan Implementing Instruction (EPI) B7a: "Automated Offsite Dose Calculations"

16. Emergency Plan Implementing Instruction (EPI) B7b: "Manual Offsite Dose Calculations"

17. Emergency Plan Implementing Instruction (EPI) B13: "Determination of Core Damage Under Accident Conditions"

18. Emergency Plan Implementing Instruction (EPI) A7: "Operations Support Center Activation"

19. Emergency Public Information Organization Instruction Manual (EPIOIM)

20. Nuclear Operating Administrative Procedure (NOP-LP) 1002: "Fitness for Duty Program"

21. Security Post Instruction (SPI) 0032: "Notification of Key Emergency Response Organization Personnel"

22. Emergency Plan Implementing Instruction (EPI) A8: "Emergency Operations Facility Activation"

23. Plant Administrative Procedure (PAP) 1701: "Records Management Program"

24. Commitments addressed in this document:

B00626	P00010	P00046	P00051
B01028	P00042	P00047	P00053
L01395	P00045	P00050	P00059

3.0 DEFINITIONS

3.1 Activation/Activate

In regards to any emergency response facility, the term ACTIVATION shall refer to that time period from the decision to mobilize or ACTIVATE a facility to the decision to declare the facility OPERATIONAL.

3.2 Operational

In regards to any emergency response facility, the term OPERATIONAL shall refer to the decision to declare a facility functional and ready to perform its stated function(s).

4.0 RESPONSIBILITIES

4.1 **Control Room Shift Supervisor**

1. Direct the prompt activation of the TSC as required by the Emergency Plan, and in support of the Control Room for abnormal plant events.

2. Direct the activation of the alternate TSC based on plant conditions.

4.2 **TSC Operations Manager**

1. Manage the onsite activities of the Emergency Response Organization (ERO) under the direction of the Emergency Coordinator. <P00050, P00053>

2. Assume the duties and responsibilities of the Emergency Coordinator, from the Shift Supervisor once the TSC is operational, and subsequently transfer these responsibilities to the Emergency Coordinator in the Emergency Operations Facility (EOF) when it has been declared operational. <P00051>

3. Ensure the TSC is manned and operated in accordance with this instruction.

4. Utilize TSC and Operations Support Center (OSC) staff to provide guidance and direction to assist the Control Room personnel in identifying and mitigating the effects of the emergency condition and in the assessment of plant conditions.

5. Coordinate the combined activities of the TSC, Control Room, and the OSC and all emergency teams and support personnel dispatched from the OSC.

6. Provide information to the Information Liaison stationed in the TSC, and approve Company press statements for event classified as an Alert or more severe.

7. Authorize emergency radiation exposure limit extensions per <HPI-B0003>.

8. Coordinate the quarantining of equipment/components resulting in or caused by events resulting in an Emergency Plan classification per <EPI-A1>.

4.3 **Administrative Assistant**

1. Coordinate the activation and manning of the TSC in support of the Operations Manager.

2. Coordinate TSC Communicator and Support Staff activities, and the augmentation and relief of TSC staff.

3. Assist TSC staff in obtaining available resources within the Perry Plant departments, and within the Company prior to the EOF being declared operational, which may be required.

4.4 **Radiation Protection Coordinator**

1. Coordinate all Radiation Protection and Chemistry activities in support of emergency operations, including assessment of radiological hazards within the plant. <P00047>

2. Coordinate interim offsite radiological monitoring, dose assessment, and development of protective action recommendations. <P00046>

3. Coordinate the issuance of dosimetry and the processing of emergency exposure limit extensions per <HPI-B0003>.

4. Coordinate the monitoring of area and airborne radiation levels in the TSC, and direct the shifting of TSC HVAC modes.

4.5 Plant Technical Engineer <P00045>

1. Assess plant parameters to determine the condition of the core, safety related systems, and fission product barriers.

2. Analyze plant conditions and develop guidance for protection of the core.

3. Supervise engineering and design activities in support of emergency operations.

4. Provide a liaison between the ERO, Gilbert Associates, Inc., General Electric Company, the Institute of Nuclear Power Operations (INPO), and any other contractor or Industry support organizations.

4.6 Maintenance Coordinator

1. Coordinate the dispatching and tracking of OSC personnel, through the OSC Coordinator, in support of priorities established by the TSC.

2. Obtain required technical support for OSC activities from TSC staff.

3. Provide the OSC with plant technical, operations, and maintenance information, and continuously apprise the OSC Coordinator of current plant status and transient conditions.

4.7 Operations Advisor

1. Continuously review emergency conditions and recommend reclassification of the emergency event, if required.

2. Serve as the Shift Supervisor's liaison, continuously apprising TSC staff of Control Room operations and requirements.

3. Apprise the Shift Supervisor of TSC priorities and TSC/OSC activities.

4. Supervise radwaste processing activities in support of emergency operations.

5. Assist the Radiation Protection Coordinator in the development of release duration estimates for protective action calculations, prior to the EOF being declared operational.

6. Serve as interim TSC Operations Manager in the event that the arrival of a designated individual is delayed or the TSC Operations Manager becomes incapacitated.

4.8 Security Coordinator

1. Coordinate all onsite security operations with the Supervisor, Nuclear Security Operations (SNSO), in support of the emergency condition.

2. Coordinate the accountability of onsite personnel, as necessary, in support of the Operations Manager.

3. Coordinate the access control requirements onsite and at the Emergency Operations Facility (EOF).

4. Provide a liaison between the Perry Plant and any Federal, State, or local law enforcement agencies.

5. Assist in the classification or reclassification of security-related events per <EPI-A1>.

4.9 **Regulatory Affairs Coordinator**

1. Serve as a source of plant and event information for FirstEnergy Liaisons located in State and local County Emergency Operations Centers (EOCs) or Emergency Management Agency (EMA) offices.

2. Coordinate telephone communications with Federal, State, and local county officials, outside of formal notifications performed in accordance with <EPI-B1>.

3. Contact a second Regulatory Affairs Coordinator or relocate to the EOF, when notified that representatives from the State of Ohio are being dispatched to the Perry Plant.

4. Dispatch a FirstEnergy Liaison(s) to the State EOCs when requested.

4.10 **Information Liaison**

1. Obtain, evaluate, and disseminate information concerning the emergency to the Public Information Response Team (PIRT) or Joint Public Information Center (JPIC) in accordance with the <EPIOIM>.

4.11 Deleted

5.0 ACTIONS

5.1 **Control Room Shift Supervisor**

1. Direct the activation of the TSC in accordance with <EPI-A2>, or the mobilization of TSC staff in support of a non-Emergency Plan event in accordance with <EPI-A1>.

2. Direct and announce the use of the EOF as an alternate TSC per <EPI-A2>, if plant conditions render the 603' elevation of the Service Building not accessible.

3. Transfer the non-delegatable Emergency Coordinator duties to the TSC Operations Manager when the facility is operational and when he is ready to assume these duties.

> For events not classified under <EPI-A1>, involving the mobilization of TSC staff, the duties and responsibilities of the Emergency Coordinator will remain with the Shift Supervisor and NOT be transferred to the TSC.

5.2 **TSC Operations Manager**

5.2.1 Activation:

1. Go directly to Section 6.1 if TSC staff is being mobilized in response to a non-Emergency Plan event; otherwise continue on to Step 2.

2. If the EOF is to be used as the alternate TSC, refer to the Alternate TSC Layout (Attachment 2) before proceeding, otherwise, continue on to Step 3.

3. Direct the Administrative Assistant, to coordinate the activation of the TSC using TSC Activation Checklist (PNPP No. 7987, Attachment 1).

   a. If a qualified Administrative Assistant is not yet present in the TSC, appoint an interim Administrative Assistant from available personnel.

> Goal for declaring the TSC operational is 60 minutes from the time of event classification: 15 minutes for ERO notifications; 30 minute response time when notified; plus 15 minutes to bring facility to an operational status.

4. Contact the Shift Supervisor to become apprised of current plant status, transient conditions, and emergency actions underway.

5. Utilize the event checklists contained in <EPI-A2> to obtain an accurate appraisal of emergency actions already performed or underway.

6. Periodically, assess personnel staffing levels through the Administrative Assistant, to determine if the following minimum staffing exists to declare the TSC operational:

C-1

- o Operations Manager
- o Administrative Assistant
- o "5-Way" Communicator
- o ENS Communicator or assigned engineer
- o Operations Advisor
- o Maintenance Coordinator
- o Plant Technical Engineer
- o Core/Hydraulic (Reactor) Engineer
- o Radiation Protection Coordinator
- o Dose Assessor (on-shift Chemistry Technician)

a. If the arrival of a required TSC staff member is delayed, use your judgment in appointing another available TSC staff member to cover that position on an interim basis.

b. Direct the Administrative Assistant to track the arrival of qualified personnel for the following TSC positions which can be manned after the TSC is declared operational to augment staffing:

- o Electrical Engineer
- o Mechanical Engineer
- o Regulatory Affairs Coordinator
- o Security Coordinator
- o Information Liaison
- o Radiation Protection Assistant
- o Support Staff (3)
- o Communicator (3rd)

7. When the minimum staffing requirements are met and the TSC is ready to be declared operational, perform the following steps using the TSC Activation Checklist:

> An Interim Operations Manager may declare the TSC operational, and accept responsibility for the non-delegatable Emergency Coordinator duties in coordination with TSC staff.

a. Use Intra-Facility Public Address System (PA) to:

(1) Brief TSC/OSC staff on current plant status, event conditions, any emergency response efforts underway, and Control Room needs and priorities.
(2) Remind TSC staff to log-in for accountability purposes using the TSC Hallway card reader.

b. Announce over the Plant PA System that "the TSC is OPERATIONAL, and control for OSC activities (if operational) has been transferred to the TSC". Record time TSC declared OPERATIONAL in logbook.

c. Inform the Security Coordinator that the TSC has assumed responsibility for directing SAS to perform further ERO notifications.

d. Inform the Shift Supervisor that the TSC is now OPERATIONAL, and establish when the following Emergency Coordinator duties will be transferred to the TSC:

- event classification per EPI-A1
- offsite notifications per EPI-B1
- offsite protective action recommendations per EPI-B8

1) Notify the TSC administrative Assistant prior to assuming offsite notification responsibilities.

> If a notification is pending (within 30 minutes), the TSC should defer assuming offsite notification responsibilities until the upcoming notification is completed.

e. Announce over the Intra-Facility (TSC-OSC) PA the transfer of Emergency Coordinator duties from the Control Room to the TSC, record transfer in logbook, and post the transfer of responsibilities on facility status board.

f. Review and sign the TSC Activation Checklist.

5.2.2 Operation:

1. Perform the actions of the Emergency Coordinator outlined in <EPI-A2>, concurrently with this instruction, utilizing the associated event checklist to document completion of required actions, until such time as the EOF is operational or the event is terminated.

2. Direct OSC operations through the Maintenance Coordinator in support of established priorities.

> The Control Room Shift Supervisor will retain the authority to direct the Fire Brigade, First Aid Team (FAT) and shift personnel.

3. Ensure the effective direction of the onsite emergency response effort through the establishment, periodic revision, and tracking of TSC priorities.

   a. Establish OSC and Engineering Task Priorities in conjunction with TSC staff and post on facility status boards; revise periodically based on changing plant condition.

   b. Direct the quarantining of equipment/components, whose failure resulted in or was caused by events, leading to or associated with the E-Plan classification, and which restoration is not immediately required to support the safe operation or shutdown of the plant.

4. Direct technical and engineering analyses through the Plant Technical Engineer in support of established priorities.

5. Direct radiological aspects of the emergency in-plant and within the site boundary through the Radiation Protection Coordinator.

6. Approve the extension of personnel exposure limits, as recommended by the Radiation Protection Coordinator, per <HPI-B0003>.

7. Approve and implement onsite protective actions as necessary.

8. Ensure the effective and timely communication of TSC priorities and OSC team status to the Shift Supervisor, and briefing of TSC staff on Control Room activities by the Operations Advisor.

9. Approve the use of potassium iodide (KI) for plant personnel, and Radiation Monitoring Team (RMT) personnel prior to EOF operation, per <EPI-B8>.

10. Ensure the effective and timely implementation of the accountability of onsite personnel through the Security Coordinator per <EPI-B5> at a Site Area Emergency.

11. Periodically review established priorities, and brief TSC personnel on the status of the emergency, Control Room emergency actions underway, and the status of OSC and engineering activities.

12. Provide updates to Federal, State, and local county officials over established telephone links at the request of the Regulatory Affairs Coordinator.

    a. Do NOT become distracted by calls directly from the NRC or other offsite agencies; refer calls and inquiries to the Regulatory Affairs Coordinator.

13. When informed that the Nuclear Regulatory Commission (NRC) Regional Site Team has been dispatched to the Perry Plant, perform the following:

    a. Notify Regulatory Affairs Coordinator, the Shift Supervisor, and the EOF Emergency Coordinator (if the EOF is operational).

    b. Direct the activation of the EOF at this time, if the EOF has not yet been activated.

14. Direct the transfer of responsibility for offsite notifications, event re-classification, and for approval of offsite protective action recommendations to EOF once operational and the EOF Emergency Coordinator is ready to accept duties, by performing the following:

    a. Notify the Administrative Assistant when responsibility for offsite notifications will be transferred to the EOF.

    b. Notify the Radiation Protection Coordinator when responsibility for offsite dose projection and protective actions will be transferred to the EOF.

    c. Update facility status board to reflect the transfer of Emergency Coordinator duties to the EOF.

15. Direct the Administrative Assistant to establish a Plant Operations Review Committee (PORC) quorum for an unscheduled meeting per <PAP-0103>, if deemed necessary to address procedural concerns.

16. Approve Company news statements for events classified at an Alert or higher, prior to the EOF being declared operational.

17. Authorize the Administrative Assistant to develop and initiate a relief rotation for TSC and OSC staff.

    -- If radiation levels resulting from an offsite release restrict the movement of people within the 10-mile EPZ, direct relief personnel to report to a FirstEnergy facility and arrange for transport to the site.

18. Direct the collection of event records per <EPI-B9> and demobilization of the TSC staff upon termination of the event.

5.3 Administrative Assistant

5.3.1 Activation:

1. Go directly to Section 6.2 if TSC staff is being mobilized in response to a non-Emergency Plan event; otherwise continue on to Step 2.

2. Initiate the callout process upon arriving at the TSC when onsite, or prior to departure from home to the TSC by contacting a support staff member or communicator to initiate a call tree, to obtain a total of 3 Communicators and 3 Support Staff. Ensure fitness for duty status is determined per <NOP-LP-1002>.

3. Track the arrival of TSC staff members on TSC Activation Checklist, and brief the TSC Operations Manager on staffing levels upon his arrival and routinely there after until required TSC staff positions are filled.

   a. If the activation of the TSC coincides with the initiation of a site accountability/evacuation, contact the Training and Education Center (TEC) Auditorium at Ext. 7817 and either dismiss the assembled personnel or direct needed personnel to report to the TSC.

4. If the EOF is being used as the alternate TSC, refer to the Alternate TSC Layout (Attachment 2) before proceeding; otherwise continue on to Step 5.

   a. Assist arriving TSC staff in finding workstations and equipment.

      NOTE: TSC forms and other reference materials are stored in E-Plan locker located in FirstEnergy Room.

   b. In addition to the actions listed on the TSC Activation Checklist, perform the following:

      1) Instruct TSC Engineers to use TEC 110/111 Conference Room as a work area and to install telephones stored in E-Plan locker.

      2) Relocate photo copier (XEROX) from the second floor, TEC to the EOF using the door key located in EOF keybox.

      3) Instruct the On-Call Emergency Plan Representative to assist in placing the EOF HVAC in emergency isolation, if required.

5. Coordinate the manning and activation of the TSC utilizing the TSC Activation Checklist.

   a. Assign Communicators to the following circuits as personnel become available:

      - ("5-way") State and Local County Ringdown.
      - NRC Emergency Notification System (ENS) Circuit.
      - FirstEnergy 800 MHz (RMT) Radio Link.

      1) If sufficient communicators are not available within 45 minutes of declaring the event to support the TSC operational, contact the Shift Supervisor and coordinate the transfer of Control Room Communicators to the TSC.

   b. Verify that a TSC engineer has been assigned by the Plant Technical Engineer to the NRC ENS Circuit.

   c. At an Alert classification or above, verify that the Emergency Response Data System (ERDS) link to the NRC has been initiated by the TSC Operations Advisor.

      1) If not yet operational, activate ERDS per Section 5.7.1.1 within one (1) hour of the Alert declaration.

   d. Assign support (clerical) staff to the following tasks as they become available:

      - TSC Operations Manager's Log
      - TSC Task Priorities/OSC Team Statusboards
      - Plant Technical Data and Plant Radiological Data Statusboards

e. Synchronize facility wall clocks in Display Room, FirstEnergy Office, Hallway and the Access Control Point with Integrated Computer System (ICS).

This action shall not delay declaring TSC operational.

6. Submit the TSC Activation Checklist to the TSC Operations Manager for review and approval once minimum staffing has been met and equipment checks performed.

   a. If upon completion of the TSC Activation Checklist a designated TSC Operations Manager has not yet arrived, forward the checklist to the TSC Operations Advisor as interim TSC Operations Manager.

7. Inform the TSC Communicators when the TSC will assume responsibility for making offsite notification to the NRC, State of Ohio, and local Counties.

5.3.2 Operation:

1. Coordinate the drafting, review/approval, and transmission of the initial and follow-up notifications to the NRC, State of Ohio, and local counties per <EPI-B1>.

2. Coordinate the drafting, review/approval, and transmission of periodic updates and requests for technical assistance to the INPO and American Nuclear Insurers (ANI) per <EPI-B1>.

3. Conduct telephone callouts for additional TSC staff if required, or to assist the OSC Coordinator in contacting additional personnel, using the <Emergency Response Telephone Directory>. Ensure the fitness for duty status is determined per <NOP-LP-1002>.

4. When informed by the "5-way" Communicator that State representatives are responding to the Perry Plant, perform the following:

   a. Inform the Regulatory Affairs Coordinator.

   b. Instruct the Information Liaison to notify the PIRT, at Ext. 5044, of the pending arrival of the State Public Information Officer.

5. When informed by the ENS Communicator that the Health Physics Network (HPN) circuit is to be opened, notify the Radiation Protection Coordinator.

6. When informed by the ENS Communicator that the NRC Regional Site Team or Augmented Inspection Team (AIT) has been dispatched to the Perry Plant, notify the Operations Manager and Regulatory Affairs Coordinator.

   a. Direct the appropriate Communicator to announce the activation of the EOF over the "5-way" circuit if the TSC Operations Manager directs the activation of the EOF in support of the NRC Site Team.

7. Deleted C-1

8. Obtain available Perry Plant and Company resources as necessary to support emergency response activities.

   a. If the EOF is operational, direct any requests for Company resources to the EOF Manager.

9. Initiate repairs to emergency plan-related communications and the Private Branch Exchange (PBX) and Off-Premise Exchange (OPX) Circuits per <PSI-0007>.

10. Initiate repairs to administrative support equipment, i.e., FAX, Xerox, CVAX, aperture card reader, etc., by contacting the party(ies) listed in the <Emergency Response Telephone Directory> under "Communications Equipment Operating Guidelines." C-1

    a. If site personnel accountability has been initiated, contact the OSC for available technical repair assistance.

11. When directed to convene an unscheduled PORC meeting, assemble a quorum using a qualified chairman or designated alternate and qualified members or alternates onsite or via a conference call and act as PORC Secretary in accordance with <PAP-0103>.

12. Upon the activation of the EOF, contact the EOF Manager to coordinate the transfer of offsite notification duties, but DO NOT transfer this responsibility until authorized by the TSC Operations Manager.

    a. Direct the TSC Communicators to transfer offsite notification responsibilities to the EOF when authorized per <EPI-B1>.

    The TSC will retain responsibility for maintaining an open ENS line after the EOF is operational and responsibility for offsite notifications have transferred.

13. Coordinate the relief of TSC and OSC personnel at the direction of the TSC Operations Manager by performing the following:

    a. Determine TSC relief personnel needs for key TSC positions and OSC relief personnel needs through the Maintenance Coordinator, and submit rosters to TSC Operations Manager for review and approval.

    b. Have the Radiation Protection Coordinator determine whether relief personnel should be directed to report to the Perry Plant site or to an offsite company location.

        1) If radiation levels from an offsite release restrict movement in the 10-mile EPZ, coordinate with the EOF, if operational, in directing relief personnel when contacted to report to a FirstEnergy facility, such as the Concord Service Center (COSC), in arranging transportation to the site through the Transportation Officer at the Lake County EOC at 953-5480, and in establishing radiological monitoring/dosimetry requirements.

    c. Direct available Communicators and support staff to contact required TSC relief personnel utilizing the <Emergency Response Telephone Directory>. Ensure the fitness for duty status is determined per <NOP-LP-1002>.

d. Assist the OSC Coordinator in contacting required relief personnel using the OSC Staff Callout Listings available in the OSC. Ensure the fitness for duty status is determined per <NOP-LP-1002>.

e. Keep the Operations Manager informed of the status of staff relief efforts.

14. Upon deactivation of the TSC perform the following:

a. Return TSC HVAC to normal operating mode.

b. Coordinate the collection of event records per <EPI-B9>.

c. Clean-up of the TSC.

d. Dismiss facility communicators and support staff.

5.4 Radiation Protection Coordinator

5.4.1 Activation:

1. At an Alert classification or above, perform the following:

a. Direct the on-shift or other qualified Chemistry technician to report to the TSC as a Dose Assessor and to perform the following:

1) Verify the operability of the Computer-Aided Dose Assessment Program (CADAP) and associated DEC laser printer per <EPI-B7a>.

2) Assemble two (2) RMTs in the EOF Decontamination Room per <EPI-B3>, and brief them prior to deployment. <P00059, P00042>

3) Verify that the TSC airborne and area radiation monitors are operating, or are placed in operation per <SOI-D19>.

-- If either the TSC area or airborne radiation monitors are out of service, direct the OSC Radiation Protection Supervisor to have periodical habitability monitoring of the TSC initiated.

b. Verify with the OSC that a minimum of four (4) Radiation Protection (RP) technicians are available onsite or are being called in to support in-plant/OSC RP activities.

2. Call-in, or obtain from the OSC if available, a qualified Radiation Protection Assistant (RPA), if additional support is needed to track and evaluate in-plant Radiation Protection concerns and OSC activities. Ensure the fitness for duty status is determined per <NOP-LP-1002> for all call-ins.

3. Request from the Administrative Assistant that personnel be assigned, when available, to the following positions:

   a. RMT Communicator

   b. Radiological Status Boards (in TSC Display Room)

The Radiation Protection Coordinator is responsible for instructing the statusboard keeper on how and when to update boards, and for resolving any questions or discrepancies in data.

5.4.2 Operation:

1. When notified by the Administrative Assistant to establish an open line on the HPN, assign an available Radiation Protection technician from the OSC to keep the NRC apprised of significant plant Radiation Protection concerns and answer any Radiation Protection related questions regarding the event. <B00626>

2. Direct the Radiation Protection Assistant to perform the following:

   a. Interface with the OSC RP Supervisor to ensure the continuous monitoring of radiological condition in-plant and onsite.

   b. Monitor plant radiological trends on the Integrated Computer System (ICS); immediately notify TSC staff and the OSC RP Supervisor of significant changes in radiological conditions.

c. Assist the Administrative Assistant in completing applicable portions of the Initial Notification form (PNPP No. 7794), Follow-up Notification form (PNPP No. 7795), and Industry Event Notification form (PNPP No. 9596) per <EPI-B1>.

d. Periodically update or assist Support Staff in updating facility statusboards with current in-plant and site radiological information.

e. Assist the HPN Communicator in responding to NRC inquiries and periodic status updates.

3. Recommend the use of protective measures for plant personnel as needed, including the use of potassium iodide (KI) per <EPI-B8>, respirators/self-contained breathing apparatus (SCBAs), etc.

4. Direct the Dose Assessor to coordinate the following:

a. Control and deployment of RMTs per <EPI-B3>. <P00059>

b. Assessment of actual or postulated radiological releases per <EPI-B7a> and <EPI-B7b>.

c. Development of Protective Action Recommendations (PAR) for the general public per <EPI-B8>.

d. Recommendation of protective measures for RMT personnel per <EPI-B3>.

e. Ensure that the Radiological Statusboards are updated with dose estimates, meteorology conditions, etc.

5. Review and recommend PARs for the general public to the TSC Operations Manager for approval (prior to the EOF assuming responsibility for PARs).

6. Periodically verify radiation levels on both the TSC area and airborne monitors.

a. If area or airborne radiation readings exceed normal levels, direct the TSC Maintenance Coordinator to have the TSC HVAC system placed in "recirculation" mode; consider recommending the evacuation of any unnecessary TSC support personnel and issuance of high range dosimetry per <EPI-B11>, and initiate periodic habitability surveys by Radiation Protection.

b. If either monitor becomes out of service, direct the OSC Radiation Protection Supervisor to initiate periodic TSC habitability monitoring.

7. Coordinate plant Chemistry activities, including the estimation of core damage per <EPI-B13>, through the OSC Chemistry Supervisor or Dose Assessor.

8. If the TSC was activated at an Unusual Event, perform Section 5.4.1.1 to mobilize required staff when event escalates to an Alert classification or above.

9. Upon the declaration of a Site Area Emergency, perform the following:

   a. Dispatch a Radiation Protection technician to the Primary Access Contact Point (PACP) in support of personnel accountability and, if warranted, recommend to the TSC Operations Manager the use of offsite assembly/decontamination centers per <EPI-B5>.

   b. Verify a minimum of seven (7) Radiation Protection Technicians and two (2) Chemistry Technicians are onsite in support of in-plant/OSC activities. Direct the OSC to conduct additional callouts as necessary per <NOP-LP-1002>, to meet this commitment.

   c. Direct the Dose Assessor to mobilize a third RMT per <EPI-B3>, and to brief EOF personnel on dose assessment and RMT activities. <P00042>

   d. Ensure dosimetry is issued to TSC, Control Room, OSC, and EOF staff per <HPI-B3>.

   e. Dispatch an RP Technician, when available, to the EOF to assist in radiological monitoring of facility.

      1) If Backup EOF is activated in lieu of or in support of onsite EOF, dispatch an RP Technician to the Ashtabula Service Center (ASSC).

10. Once the EOF is operational, perform the following:

   a. When authorized by the TSC Operations Manager, turnover of responsibility for dose assessment activities per <EPI-B8> and for control of the RMTs per <EPI-B3>.

b. Request the Offsite Radiation Advisor (ORA) to open the EOF HPN line and handle NRC requests for dose assessment information.

> Responsibility for relaying information on site and in-plant health physics concerns will remain in the TSC.

c. At your discretion, relocate the Dose Assessor to the EOF to assist in offsite dose assessment activities.

d. Continue to track protective actions being recommended by Perry and implemented offsite.

e. Inform the ORA of radiochemistry and radiological survey results or anticipated plant operations which may affect offsite dose projections.

11. Provide instructions to Control Room, OSC, TSC and EOF staff on the collection and processing of dosimetry as part of staff relief or facility deactivation.

5.5 Plant Technical Engineer

5.5.1 Activation:

1. Determine if a Core/Hydraulic Engineer, Electrical Engineer, and Mechanical Engineer have arrived yet.

   NOTE: Electrical and Mechanical Engineers have a response time goal of ≤60 minutes; therefore, declaration of the TSC as operational should not be delayed pending the arrival of these engineers.

2. Assign the first available engineer to monitor the NRC ENS Circuit and direct individual to perform the following:

   NOTE: Operating instructions are listed in the <Emergency Response Telephone Directory> under "Communications Equipment Operating Guidelines".

   a. Inform the NRC of significant changes in the operational status of the plant or abnormal trends in plant data.

   b. Record NRC questions and requests on a Communications Record Sheet (PNPP No. 6284) per <EPI-B1>.

   c. Keep the Regulatory Affairs Coordinator apprised of NRC activities.

3. Contact additional engineering staff members based on the emergency event. Ensure the fitness for duty status is determined for call-ins per <NOP-LP-1002>.

   a. Contact the on-shift Shift Technical Advisor (STA) to locate the relief shift STA and/or the training Shift STA during normal working hours to support TSC operation.

4. Appoint engineering staff members as they become available, to the following duties:

   a. Lead Engineer to coordinate and track engineering activities and to brief TSC engineers in plant FirstEnergy Room on event status and plant conditions.

   b. ICS Operator/Plant Technical Data Statusboard Coordinator.

5. Update the Plant Technical Data Statusboards, and request from the Administrative Assistant that a support staff member be assigned to maintain this board when available.

The Plant Technical Engineer is responsible for instructing the statusboard keeper on how and when to update this board, and for resolving any questions or discrepancies in data.

   a. If the ICS is inoperable or access to data limited, dispatch an available Communicator or TSC/OSC staff member to the Control Room to initiate and maintain an open line over the Statusboard Ringdown Circuit.

6. Contact the Control Room STA to verify that the TSC-STA Ringdown Circuit is plugged in and operational.

7. Initiate and track engineering activities in support of the emergency event based on priorities once established.

8. Brief the TSC Operations Manager on engineering activities which are underway or required, as well as engineering support available to respond to the emergency event.

5.5.2 Operation:

1. Deleted

2. Maintain contact with STA for an assessment of plant conditions and current or postulated Control Room actions.

3. Direct the actions of plant technical and engineering design personnel to analyze plant conditions and system/equipment status in support of the Control Room shift staff and based on priorities established by TSC Operations Manager.

4. Track TSC engineering activities and revise assignments as needed to meet current TSC priorities.

5. Assign available engineering support to assist in briefing OSC teams and in providing in-plant engineering support to OSC team members.

6. Act as a liaison between the ERO and INPO, General Electric (SIL No. 324, "BWR Emergency Support Program"), and other contractors or Industry support organizations on technical and design matters. <B01028>

   a. Request for INPO technical or equipment/expertise location assistance should be made through the Administrative Assistant using an Industry Event Notification form (PNPP No. 9596) per <EPI-B1>.

7. Ensure that the Plant Technical Data Statusboard is updated periodically and data, i.e., system status, interpreted when required.

8. Periodically apprise key TSC staff members of plant technical and engineering design activities underway and recommendations developed.

5.6 Maintenance Coordinator

5.6.1 Activation:

1. Contact the OSC Coordinator to become apprised of current OSC staffing and activities underway.

   a. Appoint an OSC Coordinator from supervisors available in the OSC, if the arrival of a designated OSC Coordinator is delayed.

2. Initially update the OSC Team Statusboard and request from the Administrative Assistant that a support member be assigned to maintain this board using the OSC Team Status Ringdown.

> The Maintenance Coordinator is responsible for instructing the status board keeper on how and when to update this board, and for resolving any questions or discrepancies in data.

3. Apprise key TSC staff on the status of the OSC, including current and projected staffing levels and activities presently underway or planned.

4. Notify the TSC Operations Manager when ready to assume control of the OSC from the Control Room.

5.6.2 Operation:

1. Notify the OSC Coordinator when control of OSC activities is assumed, and request that TSC Operations Manager announces over the Plant PA the transfer of OSC activities to the TSC.

2. Ensure that the Operations Foreman and the Perry Plant Operators (PPOs) are relocated to the OSC when operational per <EPI-A7>.

> Control of the on-shift PPOs remains with the Control Room.

3. Direct the dispatching of emergency teams and support personnel from the OSC through the OSC Coordinator per <EPI-A7> in support of the Control Room and based on the priorities established by the TSC Operations Manager.

> All plant personnel available onsite, i.e., Security, Safety/Fire Protection technicians, etc., should be assembled and utilized if necessary to support OSC activities until the OSC staff is properly augmented.

4. Establish the briefing requirements, as outlined in <EPI-A7>, for each OSC team directed to be dispatched.

5. Request assistance from the Plant Technical Engineer in briefing OSC teams and for in-plant engineering support when needed.

6. Continuously apprise the OSC Coordinator of plant conditions and emergency actions underway, including Control Room activities and TSC established priorities.

7. Ensure that the OSC Team Statusboard is kept current and that key TSC staff are periodically informed of the status of OSC activities.

8. Direct OSC Coordinator to request that the Operations Foreman dispatch a PPO to realign the TSC HVAC per <SOI-M52> at the request of the Administrative Assistant or Radiation Protection Coordinator.

9. Assist the Administrative Assistant in developing a relief rotation for OSC staff personnel when needed.

10. Direct the deactivation of the OSC when ordered and notify the TSC Operation Manager when OSC deactivation is complete.

5.7 Operations Advisor

5.7.1 Activation:

1. At an Alert classification or above, activate ERDS with NRC per the following: <L01395>

   a. Refer to the Emergency Response Data System Users Manual next to the ERDS terminal located in the TSC FirstEnergy Room and EOF Display Room.

   b. Press the RETURN key.

   c. When the computer prompts for Username, enter ERDS and press RETURN key.

   d. When the computer prompts for Password, enter NRCERDS and press RETURN key.

   e. Enter Option 1 and press RETURN key.

   -- If ERDS can not be activated due to computer/modem problems, notify the NRC over ENS Circuit, document failure in log, and contact Computer Support Unit (CSU).

2. Contact the Control Room personnel to become apprised of their activities, plant system/equipment status, and applicable emergency procedures/instructions entered.

3. Assist in the retrieval of plant data from ICS and the initial updating of the Plant Technical Data Statusboard.

4. Act as interim Operations Manager per Section 5.2, if the arrival of a qualified TSC Operations Manager is delayed or if the TSC Operations Manager becomes impaired, to allow the TSC to be declared operational in support of the Control Room.

5. Apprise the TSC Operations Manager upon arrival of Control Room and plant emergency activities presently underway.

5.7.2 Operation:

1. Continuously review and compare the criteria set forth in <EPI-A1> with current or projected plant and emergency conditions; recommend reclassification of the emergency event to the Operations Manager as required.

2. Monitor Control Room actions and operations to ensure compliance with approved operating procedures and instructions (i.e., PEIs, ONIs, etc.).

3. Serve as a liaison to the Shift Supervisor by:

   a. Briefing TSC staff of Control Room activities, operations underway or being considered, and needs.

   b. Apprising Control Room staff of TSC established priorities and the status of TSC engineering and OSC team status and activities.

   c. Advising the TSC Operations Manager on matters dealing with the operation of the reactor and support systems.

   d. Assisting in the resolution of any problems regarding the relocation of the Operations Foreman and PPOs to the OSC or in the effective utilization of the PPOs.

4. If the TSC was activated at an Unusual Event, perform Section 5.7.1.1 to activate the ERDS broadcast to the NRC when event escalates to an Alert classification or above.

5. Assist the Radiation Protection Coordinator and Dose Assessor in the formulation of release durations for offsite protective actions to the Plant Operations Advisor, when the EOF is operational.

6. Assist in the transfer of plant operations information and actions to the EOF.

7. Assist the Shift Supervisor in coordinating Radwaste processing activities in coordinating in support of the emergency event.

5.8 Security Coordinator

5.8.1 Activation:

1. Become apprised of Security activities underway and update the SNSO on current plant operations and emergency activities, as well as any abnormal radiological conditions in-plant or onsite.

2. Brief the TSC Operations Manager and TSC staff on recent and on-going Site Protection responses.

3. If the TSC is being activated concurrent with a Site Area Emergency declaration, verify that personnel responding to the TSC use the TSC Hallway card reader to log-in for accountability purposes.

4. If the EOF is being used as the alternate TSC, request that a security officer be dispatched to establish access control and restrict access to FirstEnergy employees.

5.8.2 Operation:

1. Monitor on-going security, First Aid Team (FAT), and Safety activities, and provide support to the SNSO in support of the Physical Security Plan.

   NOTE: Only Channels 3 and 5 can be monitored by radio unit at Security Coordinator's desk.

2. Apprise the SNSO of the emergency actions underway and abnormal radiological conditions in-plant or onsite.

3. Direct the SNSO to have all security officers report to the OSC when operational prior to entering the Radiologically Restricted Area (RRA).

4. Immediately notify TSC staff of an actual or potential fire or first aid incident, and coordinate with the Radiation Protection Coordinator to ensure the prompt entry and support of plant and offsite responders entering the RRA.

5. Provide a liaison between the Perry Plant and offsite law enforcement agencies concerning onsite security actions underway and requests for assistance.

6. Upon declaration of a Site Area Emergency or at the direction of the Operations Manager, perform the following:

   a. Commence personnel accountability actions per <EPI-B5>, and verify that TSC staff has logged-in using the TSC Hallway card reader.

      Within 30 minutes of initiating accountability, the Control Room Shift Supervisor must be notified of the number of people unaccounted for and search and rescue actions initiated.

   b. Ensure a Pager Messages form (PNPP No. 9100) is promptly drafted and approved by the TSC Operations Manager; the completed form orally relayed to Secondary Alarm Station (SAS); and ERO pagers activated per <SPI-0032>.

   c. Deleted

7. Upon EOF activation direct the SNSO to dispatch a Security Officer(s) to the onsite EOF or Backup EOF (at the Ashtabula Service Center) to control facility access.

8. Deleted

5.9 Regulatory Affairs Coordinator

5.9.1 Activation:

1. Become apprised of plant conditions and event status from TSC staff during activation.

2. Contact the State EOC to determine the following:

   a. Status of the State of Ohio's response to Perry Plant site. If the State makes a decision to respond to the Perry Plant site, perform the actions outlined in Section 5.9.2.4.

   b. Need to dispatch a FirstEnergy Liaison to the State EOC prior to a Site Area Emergency declaration.

   c. Discuss event status and probability for the event to worsen.

3. Contact an EMA representative or FirstEnergy County Liaisons at the EOCs in Ashtabula, Geauga and Lake Counties to clarify the event status and prognosis, and to identify a point of contact for further questions.

   NOTE: Offsite planners from Emergency Planning Unit (EPU) are contacted at an Alert level, as part of their respective counties' callout process, and will serve as a liaison between the county EOC and the Perry ERO.

4. Apprise the TSC Operations Manager of current NRC, State and county response to the event.

5.9.2 Operational:

1. At the Site Area Emergency declaration, contact a FirstEnergy Liaison using the <Emergency Response Telephone Directory> and dispatch to the State EOC if not yet performed. Ensure fitness for duty status is determined per <NOP-LP-1002>.

2. Provide an interface with the TSC Engineer manning the ENS Circuit and FirstEnergy State and County Liaisons, in response to NRC, State and local county inquiries.

   NOTE: The Executive Discussion Line (EDL) with the State and local counties shall NOT be established in the TSC.

3. Resolve any concerns regarding communications to offsite government agencies, including any requests for the establishment of additional telephone links not already described in the EPIs.

4. Upon being notified that the State is dispatching representatives to the Perry Plant site, perform the following:

   a. Update the TSC Operations Manager, and recommend either the activation of the EOF or the co-location of the State representatives at the TSC based on the event status and prognosis.

   b. Contact and dispatch a second Regulatory Affairs Coordinator to the EOF to meet the State representatives upon their arrival via Ohio National Guard helicopter. Ensure the fitness for duty status is determined per <NOP-LP-1002>.

   c. Brief the second Regulatory Affairs Coordinator upon his/her arrival onsite.

5. Document communications with offsite officials or FirstEnergy State/County EOC Liaisons in your logbook or using a Communications Record Sheet (PNPP No. 6284) per <EPI-B9>.

6. Once the EOF is activated and declared operational, relocate to the EOF and continue to coordinate the interface with offsite government agencies per <EPI-A8>.

5.10 Records

5.10.1 Records Handling

1. The records generated by emergency response personnel will be collected and maintained by Emergency Planning Unit (EPU) pursuant to <EPI-B9>. The Emergency Records Package will be transferred to Records Management pursuant to <PAP-1701>.

5.10.2 Records Capture

The following records are generated by this document:

Quality Assurance Records

TSC Activation Checklist (PNPP No. 7987)

Non-Quality Records

None

6.0 TSC STAFF MOBILIZATION FOR NON-EMERGENCY PLAN EVENTS

6.1 TSC Operations Manager

> Under no circumstances shall the Control Room Shift Supervisor transfer, or the Operations Manager accept, responsibility for the Emergency Coordinator duties unless the event is classified per <EPI-A1>.

6.1.1 Upon arrival, contact the Control Room Shift Supervisor to become apprised of event/plant conditions and required support.

6.1.2 Establish and track task priorities using facility status boards.

6.1.3 Brief TSC staff upon their arrival of event/plant condition and direct facility activities in support of established priorities.

6.1.4 Direct the Administrative Assistant to coordinate the augmentation of TSC staff based on the event.

> No minimum staffing or completion of TSC Activation Checklist is required for staff mobilization outside the Emergency Plan.

6.1.5 Direct the Operations Advisor to monitor <EPI-A1> for possible entry into the Emergency Plan based on changing plant conditions, and recommend classification of an event per <EPI-A1> to the Shift Supervisor if warranted.

6.1.6 Upon the Shift Supervisor's classification of an Emergency Plan event per <EPI-A1>, go directly to Section 5.2.1 and utilize the TSC Activation Checklist to augment staff and coordinate the transfer of Emergency Coordinator duties.

6.2 Administrative Assistant

6.2.1 Do NOT initiate the TSC Activation Checklist unless an Emergency Plan event is classified per <EPI-A1>.

6.2.2 Instruct TSC Communicator NOT to test the NRC ENS Circuit or "5-Way" State/County Ringdown.

6.2.3 Track the arrival of TSC staff and periodically notify the TSC Operations Manager of staffing levels.

6.2.4 Initiate callouts for additional TSC support at the direction of the TSC Operations Manager and on-call TSC responders, using available communicators.

6.2.5 Assign support staff as they become available to TSC status boards and the Records Room.

6.2.6 When notified by the TSC Operations Manager that the Emergency Plan has been entered, go to Section 5.3.1 and use the TSC Activation Checklist to ensure minimum staffing and testing of equipment.

TSC ACTIVATION CHECKLIST

(TO BE COMPLETED BY THE ADMINISTRATIVE ASSISTANT)

PNPP No. 7987 Rev. 1/16/01 EPI-A6

A. ☐ TSC rooms are unlocked [NOTE: Master key located in keybox outside TSC Records Room.]

B. Verify TSC manning levels:

Minimum TSC Staffing Requirements:

- ☐ TSC Operations Manager
- ☐ Operations Advisor
- ☐ Maintenance Coordinator
- ☐ Plant Technical Engineer
- ☐ Core/Hydraulic (Reactor) Engineer
- ☐ Radiation Protection Coordinator
- ☐ Dose Assessor (shift Chemistry Tech.)
- ☐ Administrative Assistant
- ☐ "5-Way" Communicator

  NOTE: Control Room communicator can be relocated to TSC to support facility activation or qualified I&C technicians used from OSC.
- ☐ ENS Communicator or assigned engineer

POSITIONS NOT REQUIRED TO DECLARE TSC OPERATIONAL:

- ☐ **Electrical Engineer**
- ☐ **Mechanical Engineer**
- ☐ **Regulatory Affairs Coordinator**
- ☐ **Security Coordinator**
- ☐ **Information Liaison**
- ☐ **Radiation Protection Assistant**
- ☐ **RMT Communicator**
- ☐ **Support Staff #1 - Operations Manager's Log**
- ☐ **Support Staff #2 - Task Priorities & OSC Team Status Board**
- ☐ **Support Staff #3 - Plant Technical Data & Plant Radiological Data Status Boards**

C. IF TSC ACTIVATION AND PERSONNEL ACCOUNTABILITY ARE BEING PERFORMED SIMULTANEOUSLY, call Ext. 7817 or request that a Security Officer or available TSC/OSC staff member be dispatched to the GET Auditorium to assess available manpower. Direct needed personnel to report to the TSC and notify Security at PACP.

D. Test the following circuits:

- ☐ Intra-Facility (TSC-OSC) PA
- ☐ Turn up Plant PA ceiling speakers in TSC rooms & hallway

E. ☐ Verify that the Operations Advisor has activated the ERDS transmission to the NRC. If not yet performed, initiate transmission at this time per EPI-A6 Section 5.7.1.1.

NOT REQUIRED TO DECLARE FACILITY OPERATIONAL

F. Facility wall clocks in the Display Room, FIRSTENERGY Room, & Hallway synchronized with ICS.

Submitted By: _____ ___/___/___ @ _____ hours

Administrative Assistant Date Time

TSC ACTIVATION CHECKLIST

(TO BE COMPLETED BY THE TSC OPERATIONS MANAGER)

PNPP No. 7987 Rev. 1/16/01 EPI-A6

1. ☐ When the minimum staffing requirements are met and the TSC is ready to be declared OPERATIONAL, brief TSC staff on current plant conditions, emergency actions underway, Control Room needs, and TSC priorities.

2. ☐ Announce over the Plant PA System that "the TSC is OPERATIONAL, and control for OSC activities (if operational) has been transferred to the TSC". Record time TSC declared OPERATIONAL in logbook.

3 ☐ Inform the Security Coordinator that the TSC has assumed responsibility for directing SAS to perform further ERO notifications.

4. ☐ Inform the Shift Supervisor that the TSC is now OPERATIONAL, and establish when the following Emergency Coordinator duties will be transferred to the TSC:
   - event classification per EPI-A1.
   - offsite notifications per EPI-B1.
   - offsite protective action recommendations per EPI-B8.

   ☐ Notify the TSC Administrative Assistant prior to assuming offsite notification responsibilities.

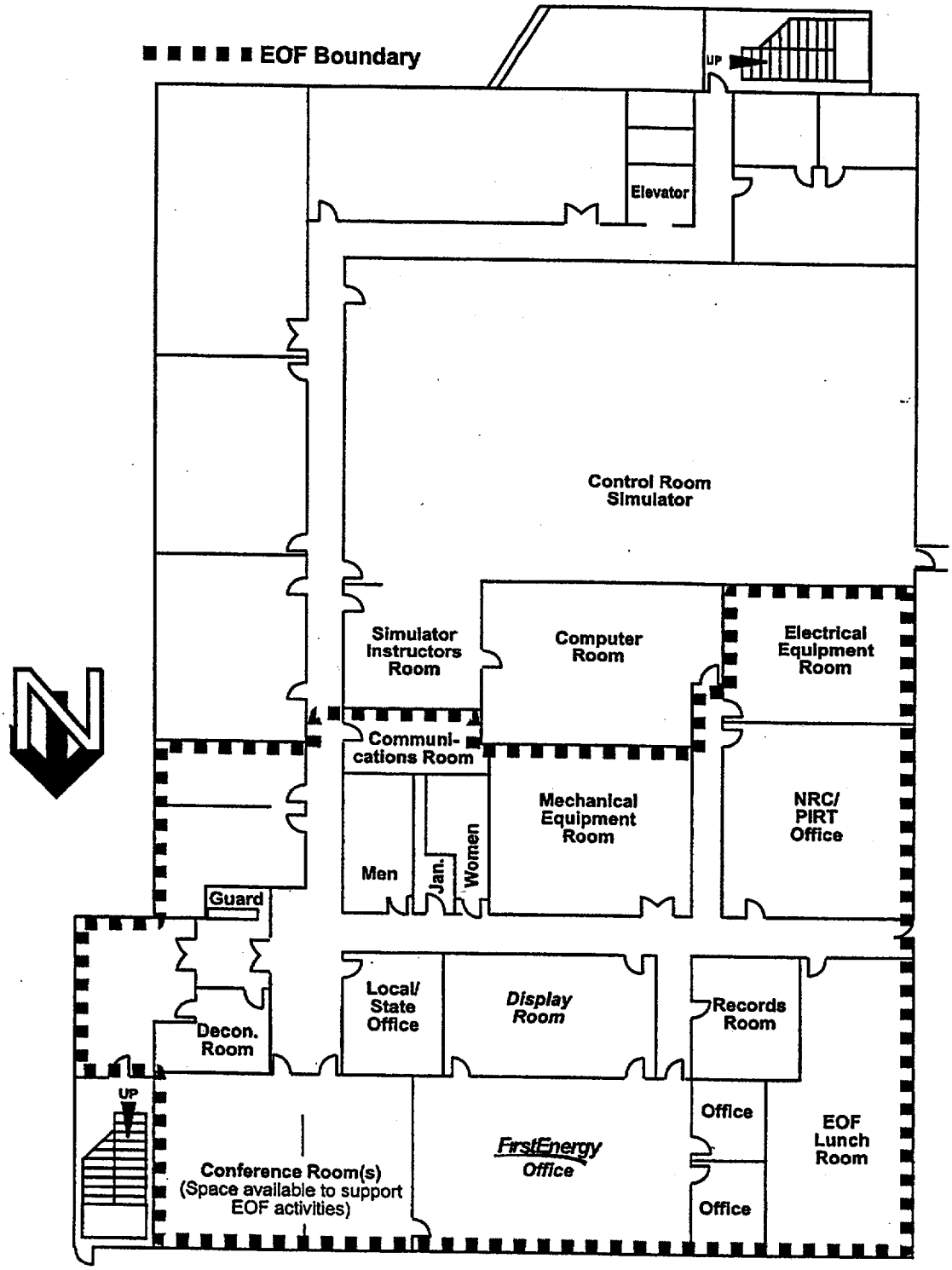
5. Announce over the Intra-Facility (TSC-OSC) PA the transfer of Emergency Coordinator duties from the Control Room to the TSC, record transfer in logbook, and post the transfer of responsibilities on facility status board:

   ☐ Event Classification ☐ Offsite Notifications ☐ Offsite Protective Action Recommendations

Declared Operational: _____ ___/___/___ @ _____ hours

TSC Operations Manager Date Time

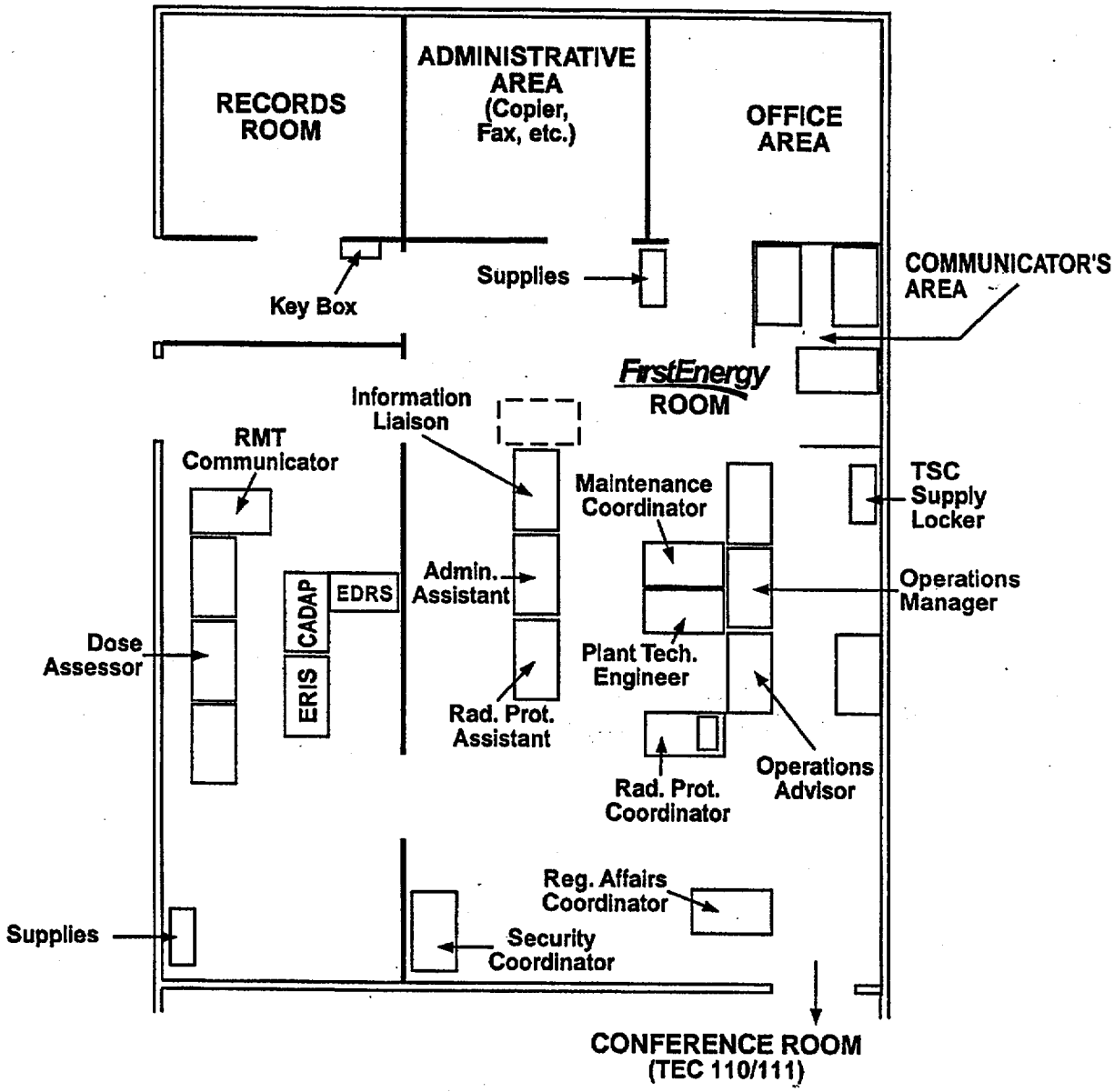
ALTERNATE TSC LAYOUT
Perry Training Center/ First Floor



2/01

PERRY NUCLEAR POWER PLANT
ALTERNATE TECHNICAL SUPPORT CENTER LAYOUT

TRAINING CENTER (TEC)
FIRST FLOOR



Engineering Staff

2/01

FirstEnergy Nuclear Operating Company

PERRY NUCLEAR POWER PLANT

UNIT 1 & 2

ACKNOWLEDGMENT OF RECEIPT

Title Emergency Plan Implementing Instruction (EPI-A7), Rev. 9 C-4

Control No. 60

Letter No./Date PY-CEI/NRR-2564L / April 27, 2001

_____ _____

Signature Date

_____

Title

Return to:

Perry Nuclear Power Plant
Attn: Beverly Richardson, A240
P. O. Box 97
Perry, Ohio 44081

FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant

Controlled Document Instruction Sheet

Manual: Emergency Plan Implementing Instruction (EPI) for Perry Nuclear Power, EPI –A-0007, R/9, C-4

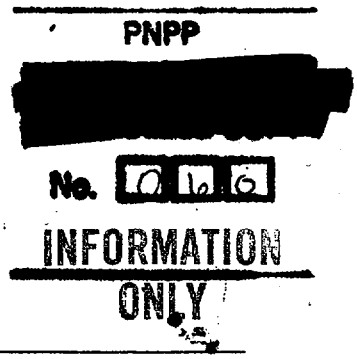
Control Number 60

Remove the pages listed below and insert enclosed pages:

Revision Number	Temporary Change No.	Insert	Remove
9	C-4	Entire Document	

The Cleveland Electric Illuminating Company

PERRY OPERATIONS MANUAL



Emergency Plan Implementing Instruction

TITLE: OPERATIONS SUPPORT CENTER ACTIVATION

REVISION: 9 EFFECTIVE DATE: 12-20-96

PREPARED: Joseph D. Anderson 8-29-96
/ Date

EFFECTIVE PIC's

PIC No.	Type of Change	Effective Date
1	Intent	4-21-97
2	Intent	1-28-98
3	Admin	10-9-00
4	Admin	4-4-01

OPERATIONS SUPPORT CENTER ACTIVATION

Table of Contents

SCOPE OF REVISION:

Periodic Review - Required

Rev. 9 -
1. Revise text and OSC Activation Checklist to address protocol and requirements for augmenting OSC staff. (PIFRA #96-1760-001, -002, and -003).
2. Revises "Health Physics" portion of the OSC Team Briefing/Debriefing Sheet.
3. Eliminated reference to storage location for PEI-SPIs and SOIs, which are now maintained at Operations Foreman's desk.
4. Updated extension no. for OSC Operations Foreman, and other minor wording changes.

Change History

PIC Number: 1 Affected Pages: i, ii, iii, 2, 3, 4, 5, 6, 7, 7a, 8, 9, 10, 11, 12, 13, 14, 15, 16, 18, 19, 20, 21

Summary of Change:
1. Addresses use of designated card reader in TSC Hallway for accountability purposes and elimination of TSC Access Control Point.
2. Addresses issuance of dosimetry per HPI-B0003.
3. Inserts reference where applicable, to PAP-0224 FFD requirements for call-ins. [PIF No. 96-3794]
4. Deletes specific reference to Dosimetry Clerks as OSC Support Staff.
5. Inserts reference to PPAs.
6. Eliminates reference to exposure received block of cover of OSC Team Briefing/Debriefing Sheet.

PIC Number: 2 Affected Pages: i, iii, 20, 21

Summary of Change:
1. OSC Team Briefing/Debriefing Sheet (Attachment 2) to address comment of dressout garments listed under "Health Physics Briefing (Part III)."

PIC Number: 3 Affected Pages: i, iii, 2, 6, 7a, 10, 11, 12

Summary of Change:
1. Changing references to PAP-0224 to NOP-LP-1002.

PIC Number: 4 Affected Pages: i, iii, 1, 4, 5, 6, 7, 8, 9, 11, 12, 13, 14, 16, 18, 19, 20, 21

Summary of Change:
1. Health Physics and HP were replaced with Radiation Protection and RP as appropriate. CRRA-00-1159-001 with a 12/14/00 due date mandates these changes.
2. Deletes reference to EPI's-A3,-A4, and A5 which were consolidated into and superseded by EPI-A2.
3. Replaced Instruction reference to Emergency Response Information System (ERIS) with Integrated Computer System (ICS).

OPERATIONS SUPPORT CENTER ACTIVATION

1.0 PURPOSE

This instruction describes the activation and operation of the Operations Support Center (OSC), and delineates the responsibilities of designated OSC personnel.

As written, EPI-A7 provides the direction and structure needed to implement the requirement of the Emergency Plan. This instruction can also be used at the Control Room Shift Supervisor's discretion to mobilize plant personnel and to provide direction and control in response to a significant plant event outside the Emergency Plan. However, plant personnel will adhere to all normal plant procedures in response to the mobilization of the OSC for an event not classifiable in accordance with <EPI-A1>.

2.0 REFERENCES

2.1 Source References:

1. Emergency Plan for PNPP Docket Nos. 50-440, 50-441
2. Emergency Plan Implementing Instruction (EPI) A6: "Technical Support Center Activation"
3. Plant Administrative Procedure (PAP) 0905: "Work Order Process"
4. Plant Administrative Procedure (PAP) 0904: "Work Prioritization System"

2.2 Use References:

1. Emergency Plan Implementing Instruction (EPI) A1: "Emergency Action Levels"
2. Emergency Plan Implementing Instruction (EPI) A2: "Emergency Actions Based On Event Classification"
3. Deleted
4. Deleted
5. Deleted
6. Emergency Plan Implementing Instruction (EPI) B5: "Personnel Accountability/Site Evacuations"

7. Plant Administrative Procedure (PAP) 1701: "Records Management Program"

8. Nuclear Operating Administrative Procedure (NOP-LP) 1002: "Fitness for Duty Program"

9. Emergency Plan Implementing Instruction (EPI) B9: "Emergency Records"

10. Emergency Plan Implementing Instruction (EPI) B11: "Emergency Dosimetry Issue"

11. Radiation Protection Administrative Instruction (RPI) 0124: "Conduct of Operation for the Radiation Protection Section"

12. Health Physics Instruction (HPI) B0003: "Processing of Personnel Dosimetry"

13. Commitments addressed in this document:

    P00059 P00092 P00101

3.0 DEFINITIONS

3.1 Activation/Activate

In regards to any emergency response facility, the term ACTIVATION shall refer to that time period from the decision to mobilize or ACTIVATE a facility to the decision to declare the facility OPERATIONAL.

3.2 Operational

In regards to any emergency response facility, the term OPERATIONAL shall refer to the decision to declare a facility functional and ready to perform its stated function(s).

3.3 Priority 1 - Emergency

Immediate action required to mitigate failures that potentially threaten reactor safety, the public health, or life. Documentation of actions taken may occur after the fact.

A PRIORITY 1 shall include those immediate response actions critical toward preventing or mitigating an actual or imminent loss of a fission product barrier, i.e., fuel, Reactor Coolant System boundary, or Primary Containment.

3.4 Priority 2 - Urgent

System or equipment failure has occurred which impacts safe shutdown equipment such that plant shutdown may be necessary, or during outages, reduces the capability to provide for decay heat removal. Priority 2 may also be assigned to deficiencies which cause or may cause reduced generating capacity and/or personnel safety hazards. Resources necessary to support eliminating the deficiency and/or hazard should be applied immediately and continuously until completed.

3.5 Priority 3 - Routine (E-Plan)

Work or assessment activities which are not categorized under "Emergency" or "Urgent" priorities, and whose delay will not impact the restoration of systems or components required to address Emergency Response Organization (ERO) task priorities.

4.0 RESPONSIBILITIES

4.1 **Shift Supervisor**

1. Coordinate the initial activation of the OSC and direction of emergency teams and support personnel from the OSC prior to the Technical Support Center (TSC) being declared operational.

2. Direct the activation of the OSC in an alternate location based on plant conditions.

3. Activate and dispatch the Fire Brigade and First Aid Teams (FAT).

4. Direct the activities of the Perry Plant Operators (PPOs) and Perry Plant Attendants (PPAs) in coordination with the TSC and OSC Coordinator.

4.2 **OSC Coordinator**

1. Coordinate the activities of emergency teams and support personnel dispatched from the OSC at the direction of the TSC, or Control Room Shift Supervisor prior to the TSC being operational.

2. Support PPO/PPA in-plant activities as requested by the Operations Foreman.

3. Maintain accountability of OSC personnel.

4. Direct the relief of OSC staff and emergency team members, as required.

5. Ensure dosimetry is issued to all OSC staff and Control Room personnel upon declaration of a Site Area Emergency or initiation of personnel accountability.

4.3 **TSC Maintenance Coordinator**

1. Direct the operation of the OSC and in support of TSC in-plant priorities and the required restoration of plant systems and components.

2. Direct all requests for emergency teams and support personnel to the OSC Coordinator.

3. Continuously apprise the OSC Coordinator of current plant status and transient conditions, and established OSC priorities.

4. Provide the OSC with plant technical, operations, and maintenance information as necessary.

5. Periodically apprise the Operations Manager on current OSC and emergency team operations.

4.4 **Operations Foreman**

1. Supervise shift PPO/PPA activities at the direction of the Shift or Unit Supervisors, and in coordination with the OSC Coordinator.

4.5 **Director, Perry Nuclear Maintenance Department (PNMD)**

1. Maintain an updated callout listing in the OSC of PMS personnel to facilitate the prompt augmentation of OSC staff.

4.6 **Manager, Radiation Protection Section (RPS)**

1. Maintain an updated callout listing of RPS personnel to facilitate the prompt augmentation of OSC staff.

5.0 ACTIONS

5.1 **Shift Supervisor**

5.1.1 Activation

1. Determine if conditions threaten or render the 599' elevation of the Control Complex unavailable.

   a. If the 599' CCB is considered available to support OSC operations, announce the activation of the OSC and conduct ERO notifications in accordance with <EPI-A2>.

   b. If the 599' CCB is NOT available/habitable, announce the relocation of the OSC to the Unit 2 Control Room.

2. Prior to the arrival of the designated OSC Coordinator, appoint an interim OSC Coordinator from Support Supervisors reporting to the OSC to expedite facility activation.

3. Apprise the OSC Coordinator of plant conditions and emergency actions underway or required.

4. Once the OSC is declared operational, direct the on-shift PPOs/PPAs and the Operations Foreman to relocate to the OSC.

5.1.2 Operation

1. Coordinate the dispatching of OSC emergency teams and personnel through the OSC Coordinator prior to the TSC being declared operational.

   a. Assign the appropriate briefing requirements, based on work priorities listed below, to each team being dispatched from the OSC based on the following criteria:

      PRIORITY 1 (EMERGENCY) ENTRY: Minimum briefing. Paperwork to be completed upon team's return to OSC, but use statusboards to track team members and team progress. Assign necessary Radiation Protection coverage to support team activities.

      PRIORITY 2 (URGENT) ENTRY: Team to be briefed and dispatched ahead of routine entry work. Parts II and III (if applicable) of briefing sheet must be completed prior to dispatching team.

      PRIORITY 3 (ROUTINE) ENTRY: Full briefing of team and completion of briefing sheet. Entry should be delayed for higher priority entries.

2. Turnover control of OSC activities, with the exception of responsibility for PPOs/PPAs, to the TSC Maintenance Coordinator when TSC is declared operational.

3. Direct requests for OSC support, except for the direction of PPOs/PPAs, through the TSC Operations Advisor.

4. Direct requests for on-shift PPO/PPA support through the Operations Foreman located in the OSC on extension 7240, assigning the appropriate briefing requirements for each team/task.

   a. Immediately advise the TSC Operations Advisor on any actual or perceived delays in the dispatching of PPOs/PPAs in support of TSC in-plant priorities and/or the required restoration/operation of plant systems and components.

5. Periodically update the Operations Foreman on plant status and emergency activities presently underway or required, and obtain a status of on-going and completed OSC activities.

5.2 OSC Coordinator

5.2.1 Activation

1. Use the OSC Activation Checklist (PNPP No. 7992, Attachment 1) to track and document completion of the activation actions outlined below.

   NOTE: Goal for OSC activation is 45 minutes: 30 minutes response time when notified, plus 15 minutes to reach operational status.

   a. If directed to use the Unit 2 Control Room an alternate OSC location, perform the following:

      1) Obtain the OSC Equipment kit stored in the Unit 1 Control Room E-Plan Locker which contains forms, procedures, etc., to aid in the initial activation of the OSC.

      2) Identify OSC personnel assembly areas to address space limitations and/or occupancy restrictions.

      3) Relocate the Plant Emergency Instruction (PEI) tool cabinet to the alternate OSC, based on ability to access the 599' CCB.

2. Determine available OSC staff present in or responding to the OSC.

   a. Direct available personnel to initiate callouts for required PMS supervisors and craft based on the event, using the PMS Callout List (maintained by PMS in the OSC). Ensure the fitness for duty status of all call-ins as determined per <NOP-LP-1002>.

   b. Verify that the on-shift Radiation Protection Supervisor or Technician-In-Charge has initiated callouts per <RPI-0124> to ensure minimum staffing levels are met.

      NOTE 1: A minimum of four RP technicians, in support of in-plant activities, are required at an Alert.

      NOTE 2: A minimum of seven RP technicians, in support of in-plant activities, are required at a Site Area Emergency.

   c. Direct the on-shift Chemistry Technician to callout a second Chemistry Technician or Supervisor per <NOP-LP-1002>, if not presently on-site, for events classified as a Site Area Emergency.

3. Identify I&C technicians qualified as Control Room/TSC Communicators and, if requested, dispatch to the TSC to assist in facility activation.

4. Identify qualified RMT Leaders and Helpers present in the OSC, and when requested, dispatch to EOF Decontamination Room as RMTs are mobilized.

   NOTE: Ensure minimum RP complement (4 at Alert/7 at Site Area Emergency) is maintained as OSC in-plant support. Callouts for additional RMT personnel, if required, will be initiated by TSC per <EPI-B3>.

5. Direct personnel reporting to the OSC Conference Room, to utilize the "accountability" card reader located in the TSC hallway.

   a. If the TSC "accountability" card reader is inoperable, obtain a listing of personnel reporting to the OSC using the Personnel Accountability Checklist form (PNPP No. 7957).

   b. When a Site Area Emergency is declared concurrent with OSC activation, direct available RP personnel to issue dosimetry to OSC staff per <HPI-B0003>.

      NOTE: OSC personnel located outside the Protected Area will report to the TEC Auditorium, Ext. 7817, once accountability is declared.

6. Utilize the OSC status boards and OSC Team Briefing/Debriefing Sheets (PNPP No. 7993, Attachment 2) to maintain accountability of OSC personnel leaving or dispatching from the OSC.

7. Contact the Shift Supervisor to obtain a briefing on plant conditions and emergency actions requiring OSC support.

8. If a potential radiological hazard exists, Radiation Protection to initiate periodic monitoring of area and airborne radiation levels in the OSC and adjacent areas. <P00092>

9. Synchronize OSC Conference Room wall clock with ICS by contacting TSC.

10. Declare the OSC operational using available staffing by performing the following:

    NOTE: The primary focus in declaring the OSC operational is to assist the Control Room in coordinating maintenance and repair activities. The OSC should, therefore, be declared operational after determining available staff.

    a. Inform the Shift Supervisor that the OSC is operational, and request that the on-shift PPOs and Operations Foreman be relocated to the OSC.

    b. Notify the TSC Maintenance Coordinator, if the TSC was activated, that the OSC is operational.

    c. Announce over the Plant PA System that the OSC is now operational.

11. Initiate actions listed under Section 5.2.2 to further augment OSC staff. Ensure the fitness for duty status of all call-ins is determined per <NOP-LP-1002>.

5.2.2 Operation

1. Assign a Radiation Protection Supervisor and, if required, a Chemistry Supervisor from OSC staff as they become available.

2. Designate and direct OSC technicians/craft to assembly areas, if necessary, to limit the number of people in and around the OSC to only those needed to support present OSC activities.

   NOTE: Assembly area locations should be chosen at the OSC Coordinator's discretion based on the number of OSC staff and with consideration to radiological conditions in-plant or onsite.

3. Assign OSC Support Staff from personnel available in the OSC to assist in maintaining a facility log per <EPI-B9> and to update OSC statusboards.

4. Contact WMS Planner area(s) to determine resources available onsite, and direct work planner(s) to report to the OSC Conference Room, if needed.

   NOTE: Pager/telephone numbers for contacting the WMS work planners are listed on the Plan of the Day (POD).

5. Contact the Warehouse Supervisor or Material Handler and inform him of the OSC activation and to ensure that assistance is available onsite in accessing the Warehouse.

   NOTE: Pager/telephone numbers for contacting Material Management support are listed on the POD.

6. For events involving the actual or potential release of toxic or combustible gas hazards or confined space entry, contact a representative from the Site Safety Unit.

7. Ensure that the OSC Task Priority Board is revised based on periodic updates for TSC.

8. Use a OSC Team Briefing/Debriefing Sheet to assign a responsible supervisor to assemble and brief each OSC team, based on the following briefing requirements established by TSC or the Shift Supervisor, and to identify required Radiation Protection coverage. <P00101>

   PRIORITY 1 (EMERGENCY) ENTRY: Minimum briefing. Paperwork to be completed upon team's return to OSC, but use statusboards to track team members and team progress. Assign necessary Radiation Protection coverage to support team activities.

   PRIORITY 2 (URGENT) ENTRY: Team to be briefed and dispatched ahead of routine entry work. Parts II and III (if applicable) of briefing sheet must be completed prior to dispatching team.

   PRIORITY 3 (ROUTINE) ENTRY: Full briefing of team and completion of briefing sheet. Entry should be delayed for higher priority entries.

   a. Request TSC engineering support for in-plant OSC team activities through the TSC Maintenance Coordinator.

   b. Utilize Operations Manual volumes, vendor manuals, plant drawings, and other reference materials available in the TSC Records Room to support the planning OSC work activities and briefing of OSC teams.

   c. Deleted

9. Assist the Operations Foreman in briefing, equipping, providing RP support, and in tracking PPOs/PPAs being dispatched from the OSC at the Control Room's direction to restore and/or operate plant systems and components.

   NOTE: While the TSC and Control Room must coordinate OSC activities whenever and wherever possible, the Shift Supervisor does have authority to direct the Operations Foreman to dispatch on-shift PPOs/PPAs from the OSC without TSC concurrence, if in his judgment the situation warrants such action.

10. Request PPO/PPA support from the Operations Foreman for OSC teams being mobilized at TSC direction.

11. Ensure that OSC Team Status Board accurately reflects team status, assigned task, and composition.

    a. Direct OSC staff to promptly communicate to the TSC using the status board ringdown, the dispatching, return, and periodic status of OSC teams.

12. Ensure that the responsible supervisor designated for each OSC team adequately briefs team members upon their returning and that actions taken, observations made, radiological surveys performed, etc., are documented on the back of OSC Team Briefing/Debriefing Sheet.

    a. If required by Responsible Supervisor, ensure that an OSC Team Troubleshooting/Activity Log (PNPP No. 9676, Attachment 3) is completed to document team activities.

13. Periodically discuss OSC status and repair activities either being planned or underway with the TSC Maintenance Coordinator.

14. Continue to assess radiological conditions in the vicinity of the OSC and staff assembly areas.

    a. If an actual or potential radiological hazard is detected, immediately notify the Maintenance Coordinator and recommend relocating assembly areas or the OSC to the Unit 2 Control Room.

    NOTE: An OSC Equipment Kit has been placed in the Unit 1 Control Room - E-Plan Locker to support the activation of the alternate OSC.

15. Arrange for the relief of OSC supervisory and staff personnel when required or as directed by the TSC Maintenance Coordinator. Ensure the fitness for duty status is determined for call-ins per <NOP-LP-1002>.

    a. Request that the TSC Maintenance Coordinator coordinate the contacting of required personnel and their access through the 10-mile Emergency Planning Zone (EPZ) to the plant, if offsite protective actions are in place.

16. Upon declaration of a Site Area Emergency or initiation of personnel accountability, perform the following:

    a. Direct OSC personnel, who have not yet done so as part of OSC activation, to log-in for accountability purposes using the designated TSC Hallway card reader.

    b. If the TSC "accountability" card reader is inoperable, forward the completed Personnel Accountability Checklist(s) to the Central Alarm Station (CAS) per <EPI-B5>.

c. Direct the Warehouse Supervisor, Warehouse Material Handler(s), or other personnel outside the facility, but required to support OSC activities, to report to the OSC for accountability and radiation protection purposes.

d. Integrate into the OSC or dismiss unnecessary OSC personnel assembling in the Training and Education Center (TEC) Auditorium.

e. Contact the TSC Security Coordinator with the name(s) of the individual(s) requiring immediate access to the Protected Area to support OSC activities prior to accountability being completed.

f. Direct the OSC Radiation Protection Supervisor to issue a direct-reading dosimeter (DRD), and Thermoluminescent Dosimeter (TLD), if necessary, to OSC staff and Control Room personnel currently without dosimetry per <HPI-B0003>.

g. Initiate callouts as required to meet the following minimum staffing levels. Ensure the fitness for duty status is determined for call-ins per <NOP-LP-1002>.

1) RP technicians/supervisors - 7 (supporting OSC in-plant activities)

2) Chemistry technicians/supervisors - 2

17. When directed to deactivate the OSC, perform the following:

a. Release OSC personnel after ensuring that all equipment is inventoried and restored, the OSC Conference Room and staff assembly areas policed, and all generated records collected.

b. Turn over all records generated to the TSC Administrative Assistant, or Control Room Assistant if the TSC was not activated per <EPI-B9>.

c. Ensure that issued dosimetry is collected.

d. Notify the TSC Maintenance Coordinator, if the TSC was not activated, or the Control Room Shift Supervisor when the OSC is deactivated.

5.3 OSC Support Supervisors

5.3.1 Activation

1. Respond to the OSC Conference Room or designated alternate location, when the Plant PA announcement is made to activate the OSC.

   NOTE: The Shift Supervisor may use his judgment based on plant conditions and designate the Unit 2 Control Room as the alternate OSC. An OSC Equipment Kit stored in the Unit 1 Control Room E-Plan Locker, should be obtained to assist in OSC activation and initial operation.

   a. If located outside the Protected Area during an OSC activation occurring simultaneously with of Site accountability/evacuation, report immediately to the TEC Auditorium and await instructions per <EPI-B5>.

2. Upon arrival, if the (duty) OSC Coordinator is not present, assume the position of interim OSC Coordinator and perform the actions listed in Section 5.2.

3. Assist in the activation of the OSC and accountability of personnel reporting to the OSC.

4. Assist the OSC Coordinator in contacting additional craft and technical support to augment OSC staffing utilizing the OSC Staff Callout Listing. Ensure the fitness for duty status of call-ins is determined per <NOP-LP-1002>.

5.3.2 Operation

1. When identified as a responsible supervisor for an OSC team, assemble and brief team members, based on the briefing requirements established by the TSC or Shift Supervisor using the OSC Team Briefing/Debriefing Sheet.

   a. If designated by OSC Coordinator, ensure team members receive a Radiation Protection briefing and Part III of the briefing sheet is completed before dispatching team.

   b. Designate whether an OSC Team Troubleshooting/Activity Log is required to document team activities.

2. Assist the OSC Coordinator in maintaining accountability of personnel located in the OSC and any OSC staff assembly areas being utilized.

3. Immediately inform the OSC Coordinator of changes in OSC team status; ensure the OSC Team Status Board is updated and that status changes are immediately relayed to TSC.

4. Ensure that teams returning to the OSC are adequately debriefed and that actions taken, observations made, radiological surveys performed, etc., are documented on the back of OSC Team Briefing/Debriefing Sheet and OSC Team Troubleshooting/Activity Log.

5. Upon declaration of a Site Area Emergency or initiation of personnel accountability, perform the following:

   a. Direct OSC personnel, who have not yet done so during OSC activation, to log-in for accountability purposes using the designated TSC Hallway card reader.

   b. Assist the OSC Coordinator in completing the Personnel Accountability Checklist (PNPP No. 7957) if the TSC "accountability" card reader is inoperable.

   c. Assist the OSC Radiation Protection Supervisor in issuing a TLD and/or DRD to all OSC staff and Control Room members currently without dosimetry per <HPI-B0003>.

5.4 Operations Foreman

5.4.1 Activation

1. Relocate the on-shift PPOs/PPAs to the OSC (599'CCB), when directed by the Shift Supervisor, and identify yourself to the OSC Coordinator.

   NOTE: The Control Room will retain control of the on-shift PPOs/PPAs at all times with the Operations Foreman acting as an interface with the OSC Coordinator.

2. Direct PPOs/PPAs to utilize the "accountability" card reader located in the TSC Hallway.

3. Notify the Shift or Unit Supervisor when the move to the OSC is complete.

5.4.2 Operation

1. When directed by the Control Room to dispatch a PPO/PPA(s), perform the following:

   a. Notify the OSC Coordinator of the names of the PPOs/PPAs, where they are being dispatched, task priority and briefing requirements assigned by the Control Room, and OSC support needed.

   b. Ensure that (1) an OSC Team Briefing/Debriefing Sheet is completed, based on the assigned priority; and (2) that a team number for tracking and accountability purposes is obtained from the OSC Coordinator.

1) PRIORITY 1 (EMERGENCY) ENTRY: Minimum briefing. Paperwork to be completed upon team's return to OSC, but use statusboards to track team members and team progress. Assign necessary Radiation Protection coverage to support team activities.

2) PRIORITY 2 (URGENT) ENTRY: Team to be briefed and dispatched ahead of routine entry work. Parts II and III (if applicable) of briefing sheet must be completed prior to dispatching team.

3) PRIORITY 3 (ROUTINE) ENTRY: Full briefing of team and completion of briefing sheet. Entry should be delayed for higher priority entries.

c. Ensure that PPOs/PPAs being dispatched are briefed on Radiation Protection concerns and RP coverage provided if deemed necessary; if not required, check NOT REQUIRED block on PART III of briefing sheet.

1) Immediately advise the Control Room and TSC Operations Advisor of any actual or perceived delays in the dispatching of PPO's/PPAs from the OSC in support of TSC in-plant priorities and/or required restoration/operation of plant systems and components.

NOTE: PPOs/PPAs may be dispatched at the Control Room's direction without OSC Coordinator concurrence. However, this should be used as a last resort, since the safety of the PPO/PPA being dispatched may be jeopardized.

2. Immediately inform the OSC Coordinator of changes in team status and ensure the OSC Team Status Board is updated.

3. Designate a PPO/PPA in support of OSC repair activities at the request of the OSC Coordinator.

4. Ensure that PPOs/PPAs returning to the OSC are adequately debriefed and that actions taken, observations made, etc. are documented on the back of the OSC Team Briefing/Debriefing Sheet.

a. Verify that an OSC Team Troubleshooting/Activity Log is completed (if required).

b. Update the OSC Team Statusboard indicating the team's return.

c. Notify the Control Room and OSC Coordinator of the team's return and restoration/status of systems and components.

5. Appoint a PPO to serve as the interim Operations Foreman if you must leave the OSC (e.g., Fire Brigade Leader).

6. Upon declaration of a Site Area Emergency or initiation of personnel accountability, ensure all on-shift PPOs/PPAs and yourself are accounted for through the OSC or, if the OSC is not yet operational, through the Control Room.

5.5 OSC Staff Personnel

5.5.1 Activation

1. Respond to the 599'CCB or designated alternate location, when the Plant PA announcement is made to activate the OSC, and utilize the "accountability" card reader in the TSC Hallway.

> The Shift Supervisor will use his judgment based on plant conditions in designating the Unit 2 Control Room as an alternate OSC.

   a. If located outside the Protected Area when an OSC activation occurs simultaneously with personnel accountability, report immediately to the TEC Auditorium and await instructions.

2. Relocate to the OSC staff assembly areas identified by the OSC Coordinator when directed.

5.5.2 Operation

1. Do not leave the OSC or its designated assembly areas unless directed to report to the OSC or released by the OSC Coordinator.

2. Ensure that you are adequately briefed and equipped based on the priority assigned to the OSC team prior to leaving the OSC.

3. Keep the OSC apprised of the status of assigned work when in the field and ensure the OSC is notified of any additional support needed.

   a. Document restoration, repair, and assessment efforts on an OSC Team Troubleshooting Log (if directed).

   NOTE: A TSC engineer may be assigned when needed to assist team personnel in troubleshooting and repair activities. In these situations, the designated OSC Responsible Supervisor, and not the TSC engineer, will retain control of team and must be apprised of team status, delays encountered, etc.

4. Continuously monitor your radiation exposure and area radiation levels when dispatched from the OSC, and request additional RP coverage if needed.

5. Immediately notify the OSC when the assigned work/task is completed, and return to the OSC Conference Room for debriefing.

6. When a Site Area Emergency is declared or personnel accountability initiated, use the "accountability" card reader located in the TSC Hallway, if not performed yet as part of OSC staffing.

   a. When in-plant or in the field as part of an OSC team and not yet logged-in for accountability, immediately contact the OSC to report your location, status, and individuals on or accompanying the team.

5.6 **Warehouse Supervisor/Material Handler**

5.6.1 Activation

1. When notified by the OSC Coordinator that the OSC has been activated, remain available at your work station or in the Warehouse to process requests for needed parts.

2. Contact material handlers, if needed, to assist in processing parts requests from the OSC.

5.6.2 Operation

1. Coordinate delivery of ordered parts to the OSC (599'CCB) or to a designated work area specified by the OSC.

2. When a Site Area Emergency is declared or personnel accountability is initiated, contact the OSC Coordinator at Ext. 5237 to obtain Radiation Protection coverage or instructions on reporting to OSC.

   NOTE: Access to the Protected Area may be delayed at the Primary Access Control Point (PACP) until accountability is complete.

5.7 Records

5.7.1 Records Handling

1. The records generated by emergency response personnel will be collected and maintained by Emergency Planning Unit (EPU) pursuant to <EPI-B9>. The Emergency Records Package will be transferred to records Management pursuant to <PAP-1701>.

5.7.2 Records Capture

The following records are generated by this document:

Quality Assurance Records

OSC Team Briefing/Debriefing Sheet (PNPP No. 7993)
OSC Team Troubleshooting/Activity Log (PNPP No. 9676)
OSC Activation Checklist (PNPP No. 7992)

Non-Quality Records

None

OSC ACTIVATION CHECKLIST

PNPP No. 7992 Rev. 12/20/00 EPI-A7

1. ☐ If alternate location for OSC is established, obtain OSC Equipment Kit from the Unit 1 Control Room E-Plan Locker.

2. ☐ Determine available manpower on-hand, and direct callouts for additional personnel:
NOTE: Do NOT delay OSC activation pending arrival of additional staff.

POSITION/DISCIPLINE	ASSIGNED/ONSITE	CONTACTED/ RESPONDING
PMS Electrical Supervisor	_____	☐
PMS Mechanical Supervisor	_____	☐
PMS I&C Supervisor	_____	☐
Radiation Protection Technicians (including Supervisors): SITE AREA EMERGENCY - 7 ALERT - 4	☐ No. _____	☐ No. _____
Chemistry Technicians: SITE AREA EMERGENCY - 2 ALERT - 1	☐ No. _____	☐ No. _____

3. ☐ Identify I&C technicians qualified as CR/TSC Communicators and, when requested, dispatch to the TSC to assist in facility activation.

4. ☐ Identify qualified RMT personnel present in OSC and, when requested, dispatch to the EOF Decon Room.
NOTE: Ensure minimum RP complement is maintained in support of OSC in-plant activities.

5. ☐ Obtain accountability by directing personnel reporting to the OSC to use the designated "accountability" card reader in the TSC Hallway.
- If a Site Area Emergency has been declared, issue dosimetry per <HPI-B003>.

6. ☐ Contact the Shift Supervisor to obtain a briefing on plant and emergency actions requiring OSC support.

7. ☐ If a potential radiological hazard exists, direct RP to initiate periodic monitoring of area and airborne radiation levels on the 599' CC and other assembly areas in use.

8. ☐ Synchronize OSC Conference Room wall clock with ICS by contacting Control Room or TSC.

9. Perform the following to declare the OSC "operational":

   ☐ Notify the Shift Supervisor that the OSC is operational and request that the Operations Foreman and PPOs/PPAs be relocated to the OSC.

   ☐ Notify the Maintenance Coordinator, if the TSC was activated, that the OSC is operational.

   ☐ Announce over the Plant PA System that the OSC is operational.

   ☐ Sign and indicate the date/time OSC was declared operational in the block below.

DECLARED OPERATIONAL: _____ at ___/___/___ _____
OSC Coordinator *Date* *Time*

PERFORM THE ACTIONS OUTLINED ON BACK OF FORM TO FURTHER AUGMENT STAFF, AS REQUIRED.

OSC ACTIVATION CHECKLIST (Cont'd)

SUPPLEMENTAL ACTIONS:

10. ☐ Assign a Radiation Protection Supervisor and, if required, a Chemistry Supervisor from OSC staff as they become available.
    Radiation Protection Supervisor: _____
    Chemistry Supervisor: _____

11. ☐ Designate and direct OSC technicians and craft to assembly areas as necessary to limit the number of people in and around the OSC.

12. ☐ Assign available staff to maintain OSC Log per <EPI-B9> and maintain facility status boards.

13. ☐ Contact WMS planner work areas or initiate callouts using contact on POD to obtain required work planner support.

14. ☐ Contact Warehouse Supervisor or Material Handler and inform him/her of OSC activation and update on potential material needs.
    NOTE: Materials Management (spare parts) contact listed on POD.

15. ☐ For events involving toxic or combustible gas hazards or confined space entry, contact a representative from the Site Safety Unit.

OSC TEAM BRIEFING/DEBRIEFING SHEET

PNPP No. 7993 Rev. 10/25/00 EPI-A7

PART I — TEAM INITIATION (OSC COORDINATOR)

BRIEFING | TEAM NO. ASSIGNED:

TASK DESCRIPTION:

PRIORITY: *(Refer to back of form for briefing required)*
- ☐ PRIORITY 1 - EMERGENCY
- ☐ PRIORITY 2 - URGENT
- ☐ PRIORITY 3 - ROUTINE

RESPONSIBLE SUPERVISOR:
- ☐ MECH. ☐ OPS
- ☐ ELECT. ☐ RP
- ☐ I&C ☐ CHEM

RADIATION PROTECTION COVERAGE:
- ☐ NOT REQUIRED - PART III NOT APPLICABLE
- ☐ REQUIRED - COMPLETE PART III
- ☐ (Priority 1) ASSIGN RP SUPPORT AND DISPATCH TEAM. DEFER COMPLETION OF PART III

TEAM AUTHORIZED BY: _____ *OSC COORDINATOR* _____ *DATE/TIME*

PART II — WORK BRIEFING (OSC RESPONSIBLE SUPERVISOR)

☐ COMPLETION DEFERRED UNTIL RETURN OF TEAM

LOCATION OF TASK: (BLDG./ELEV./ROOM/AREA)

TRAVEL ROUTE:

W.O. No. (if generated)

COMMUNICATIONS METHODS:
- ☐ GAITRONICS ☐ CONSTANT
- ☐ IN-PERSON ☐ 5 - 10 MIN.
- ☐ RADIO CH. _____ ☐ 10 - 15 MIN.
- ☐ _____ ☐ _____

SAFETY HAZARDS/PRECAUTIONS:
- ☐ ICE VESTS ☐ EAR PROTECTION
- ☐ OTHER:

- ☐ RWP DEFERRED; COMPLETE PART III
- ☐ RWP No. _____ IN LIEU OF PART III.

TEAM ASSIGNMENTS	DOSE AVAILABLE (MREM)	AUTH. DOSE (MREM)	EXPECTED DOSE (MREM)
LEADER: (1)			
MEMBERS: (2)			
(3)			
(4)			

PART III — RADIATION PROTECTION BREIFING

☐ NOT REQUIRED (PER PART 1)

☐ COMPLETION DEFERRED UNTIL RETURN OF TEAM

CLOTHING

BODY ☐ N/A	HEAD ☐ N/A	HANDS ☐ N/A	FEET ☐ N/A	FACE ☐ N/A
☐ LABCOAT	☐ SURGEON'S CAP	☐ COTTON LINERS	☐ DISPOSABLE	☐ PART. RESPIRATOR
☐ OVERALL ☐ X2	☐ CLOTH HOOD	☐ SURGEON ☐ X2	☐ OTHER:	☐ IODINE RESPIRATOR
☐ PLASTICS ☐ T ☐ B	☐ PLASTIC HOOD	☐ RUBBER ☐ X2		☐ SUPPLIED AIR RESP.
☐ MODESTY GARMENTS	☐ TAPE TO RESP.	☐ WORK GLOVES		☐ AIR HOOD
☐ OTHER:	☐ OTHER:	☐ AMBI GLOVES		☐ FACESHIELD

DOSIMETRY

TYPE	MULTIPLE W.B. ☐ N/A	EXTREMITY ☐ N/A	
☐ TLD	☐ HEAD	☐ HAND ☐ L ☐ R	☐ CONTINUOUS SURVEILLANCE
☐ 0-500 mR DRD	☐ BACK	☐ WRIST ☐ L ☐ R	
☐ HIGH RANGE DRD	☐ GONADS	☐ LOWER LEG ☐ L ☐ R	☐ PERIODIC SURVEILLANCE
☐ ALARMING (MG)	☐ ELBOW ☐ L ☐ R	☐ ANKLE ☐ L ☐ R	
☐ TELEMETRY DOS.	☐ KNEE ☐ L ☐ R	☐ OTHER	
	☐ OTHER:	☐ SEE INSTRUCTIONS	

KI USE: ☐ REQUIRED ☐ N/A
☐ If required, form PNPP No. 9177 completed.

DOSE EXTENSION(S): ☐ REQUIRED ☐ N/A
☐ If required, form PNPP No. 6639 completed.

FINAL APPROVAL (OSC RESPONSIBLE SUPERVISOR)

Required briefing(s) completed/team dispatched:

_____ *OSC Responsible Supervisor* Time dispatched _____

☐ OSC Coordinator Notified/Status Boards Updated

OSC TEAM BRIEFING/DEBRIEFING SHEET

PART IV

TEAM DEBRIEFING (OSC RESPONSIBLE SUPERVISOR)

DEBRIEFING **RETURN TIME:**

☐ OSC COORDINATOR NOTIFIED OF RETURN.
☐ OSC STATUSBOARDS UPDATED; TSC NOTIFIED OF TEAM RETURN.

DESCRIPTION OF FINAL PROBLEM AND RESULTS OF TROUBLESHOOTING:

PROBLEMS CORRECTED ☐ YES ☐ NO - ACTION NEEDED TO CORRECT PROBLEM/ACTION TAKEN TO CORRECT PROBLEM:

TEAM ASSIGNMENTS	TOTAL DOSE (MREM)	RADIATION SURVEYS TAKEN: (list survey ID nos.)
(1)		
(2)		
(3)		
(4)		

DEBRIEFING COMPLETE: _____ _____
OSC RESPONSIBLE SUPERVISOR *DATE/TIME*

TEAM BRIEFING REQUIREMENTS

a. PRIORITY 1 (EMERGENCY) ENTRY: Minimum briefing. **Paperwork to be completed upon team's return to OSC**, but use statusboards to track team members and team progress. Assign necessary radiation protection coverage to support team activities.

b. PRIORITY 2 (URGENT) ENTRY: Team to be briefed and dispatched ahead of routine entry work. Parts II and III (if applicable) of briefing sheet must be completed prior to dispatching team.

c. PRIORITY 3 (ROUTINE) ENTRY: Full briefing of team and completion of briefing sheet. **Entry should be delayed for higher priority entries.**

Page ______ of ______

PNPP No. 9676

OSC TEAM TROUBLESHOOTING/ACTIVITY LOG

EPI-A7

DATE	TIME	STEP DESCRIPTION	INITIALS

FirstEnergy Nuclear Operating Company

PERRY NUCLEAR POWER PLANT

UNIT 1 & 2

ACKNOWLEDGMENT OF RECEIPT

Title Emergency Plan Implementing Instruction (EPI-A8), Rev. 9 C-3

Control No. 60

Letter No./Date PY-CEI/NRR-2564L / April 27, 2001

_____ _____

Signature Date

_____

Title

Return to:

Perry Nuclear Power Plant
Attn: Beverly Richardson, A240
P. O. Box 97
Perry, Ohio 44081

FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant

Controlled Document Instruction Sheet

Manual: Emergency Plan Implementing Instruction (EPI) for Perry Nuclear Power, EPI –A-0008, R/9, C-3

Control Number 60

Remove the pages listed below and insert enclosed pages:

Revision Number	Temporary Change No.	Insert	Remove
9	C-3	Entire Document	

The Cleveland Electric Illuminating Company

PERRY OPERATIONS MANUAL

PNPP

[redacted]

INFORMATION ONLY

No. 0165

Emergency Plan Implementing Instruction

TITLE: EMERGENCY OPERATIONS FACILITY ACTIVATION

REVISION: 9 EFFECTIVE DATE: 3-20-95

PREPARED: Joseph D. Anderson 11-23-94
/ Date

EFFECTIVE PIC's

PIC No.	Type of Change	Effective Date
1	Intent	5-29-96
2	Intent	7-10-97
3	Admin	4-4-01

EMERGENCY OPERATIONS FACILITY ACTIVATION

Table of Contents

SCOPE OF REVISION:

Rev. 9 -
1. Removes actions for Information Liaison and Access Controller which are governed under EPIOIM and SPI-0023 respectively.
2. Changes title of Governmental Liaison to Regulatory Affairs Coordinator, and expands responsibilities and actions. Eliminated EOF Manager action to contact.
3. Identifies the Environmental Liaison as responsible individual for coordinating RMT activities.
4. Statement inserted under Emergency Coord. regarding the tracking and input into ERO in-plant priorities.
5. Statement inserted under Emergency Coord. regarding the referral of incoming calls from Federal, State, and local agencies to the Regulatory Affairs Coordinator.
6. Reworded/restructured instruction text and activation checklist to address ERO comments from 1994 drill/exercise cycle.

Change History

PIC Number: 1 Affected Pages: 1, 2, 5, 5a, 6, 7, 8, 9, 10, 13, 18, 19, 21, 22

Summary of Change:
1. Revised to address unscheduled PORC per PAP-0103.
2. Revision of EOF Activation Checklist and "activation" actions for the Emergency Coordinator and EOF Manager to streamline actions, specify minimum staffing required to declare the EOF operational, clarify goal for declaring the EOF operational, and to separate actions for declaring the EOF operational and for the transferring of Emergency Coordinator duties.
3. Deleted reference to specific survey form (too restrictive).
4. Revised Regulatory Affairs Coordinator actions to address comments from 1995 drill/exercises.

PIC Number: 2 Affected Pages: i, iii, 13, 26

Summary of Change:
1. Updates Portal Monitor Response Check (Attachment 4) to reflect monitor conversion to Gamma 60.

PIC Number: 3 Affected Pages: i, iii, 1, 2, 4, 5, 6, 8, 9, 10, 11, 12, 13, 14, 16, 17, 20, 21, 22

Summary of Change:
1. Replaced reference to PAP-0514 with HPI-B0003.
2. Deletes reference to EPI's A3, -A4 and A5 which were consolidated into and superseded by EPI-A2.
3. Changed reference from SOC to SCC and corrected telephone number.
4. Revised the Help Desk number from 43279 to 825-3700.
5. Changed reference from CEI to FirstEnergy.
6. Deleted CAPCO reference.
7. Replaced the Emergency Response Information System (ERIS) with Integrated Computer System (ICS).
8. Health Physics and HP were replaced with Radiation Protection and RP as appropriate. CRRA-00-1159-001 with a 12/14/00 due date mandates these changes.

EMERGENCY OPERATIONS FACILITY ACTIVATION

1.0 PURPOSE

This instruction describes the activation and operation of the Emergency Operations Facility (EOF), and delineates the responsibilities of designated EOF personnel.

The EOF will be activated for a Site Area Emergency or General Emergency, or at the discretion of the Shift Supervisor or Technical Support Center (TSC) Operations Manager, serving as Emergency Coordinator.

2.0 REFERENCES

2.1 Source References:

1. Emergency Plan for PNPP Docket Nos. 50-440, 50-441

2.2 Use References:

1. Emergency Plan Implementing Instruction (EPI) A2: "Emergency Actions Based On Event Classification"
2. Security Post Instruction (SPI) 0023: "Instructions for Personnel Accountability and Site Evacuation"
3. Emergency Plan Implementing Instruction (EPI) B8: "Protective Actions and Guides"
4. Plant Administrative Procedure (PAP) 0103: "Plant Operations Review Committee"
5. Emergency Plan Implementing Instruction (EPI) B9: "Emergency Records"
6. Emergency Response Telephone Directory
7. Emergency Plan Implementing Instruction (EPI) B1: "Emergency Notification System"
8. Preparedness Support Instruction (PSI) 0007: "Reporting Emergency Plan-Related Communication Equipment Problems"
9. Emergency Plan Implementing Instruction (EPI) B7a: "Automated Offsite Dose Calculations"

10. Emergency Plan Implementing Instruction (EPI) B7b: "Manual Offsite Dose Calculations"

11. Emergency Plan Implementing Instruction (EPI) B3: "Radiological Surveys for Emergencies"

12. System Operating Instruction (SOI) D19: "Post Accident Radiation Monitoring System"

13. Health Physics Instruction (HPI) B0003: "Processing Of Personnel Dosimetry"

14. Emergency Plan Implementing Instruction (EPI) B10: "Emergency Radiological Environmental Monitoring Program"

15. Emergency Public Information Organization Instructions Manual (EPIOIM)

16. Emergency Plan Implementing Instruction (EPI) B11: "Emergency Dosimetry Issue"

17. Emergency Plan Implementing Instruction (EPI) A1: "Emergency Action Levels"

18. Plant Administrative Procedure (PAP) 1701: "Records Management Program"

19. Emergency Plan Implementing Instruction (EPI) A11: "Activation of the Backup Emergency Operations Facility"

20. Commitments addressed in this document:

B00626	P00048	P00052
L01314	P00049	P00059
P00042	P00050	

3.0 DEFINITIONS

3.1 Activation/Activate

In regards to any emergency response facility, the term ACTIVATION shall refer to that time period from the decision to mobilize or ACTIVATE a facility to the decision to declare the facility OPERATIONAL.

3.2 Operational

In regards to any emergency response facility, the term OPERATIONAL shall refer to the decision to declare a facility functional and ready to perform its stated function(s).

4.0 RESPONSIBILITIES

4.1 Emergency Coordinator

1. Coordinate the overall activities of the Perry Plant Emergency Response Organization (ERO).

2. Assume the duties and responsibilities of the Emergency Coordinator from the TSC Operations Manager once the EOF is operational.

3. Ensure the EOF is manned and operated in accordance with this instruction.

4. Assist the Operations Manager in the TSC in coordinating onsite emergency response effort.

5. Provide corporate, management-level, policy decisions necessary to support emergency operations.

6. Interface with senior levels of offsite government and support agencies.

7. Apprise Corporate management of emergency response activities.

8. Ensure timely and accurate information is provided to the Emergency Public Information Organization.

9. Direct the activation of the Back-Up Emergency Operations Facility (BEOF) if necessary.

4.2 EOF Manager

1. Coordinate the activation and manning of the EOF in support of the Emergency Coordinator.

2. Direct EOF support staff in support of other key EOF positions to ensure the proper and efficient operation of the EOF.

3. Direct the EOF communicators as necessary to ensure the efficient transfer of information from and to the EOF.

4. Coordinate the augmentation and relief of the EOF staff.

5. Arrange and obtain necessary Company/Corporate or other offsite resources as requested.

6. Coordinate personnel access and accountability in the EOF.

7. Arrange for food and lodging of emergency response personnel.

4.3 **Offsite Radiation Advisor**

1. Oversee Radiation Monitoring Team (RMT) operations coordinated by the EOF Environmental Liaison.

2. Direct the performance of offsite dose projections and development of protective actions recommendations for the general public through the Lead Dose Assessor. <P00048>

3. Direct continuing offsite radiological assessment activities, including environmental monitoring/sampling.

4. Coordinate the monitoring of area and airborne radiation levels in the EOF and personnel entering the EOF for contamination.

4.4 **Plant Operations Advisor**

1. Provide the Emergency Coordinator with an operational insight of the emergency event and interpret plant design and system operation issues when required.

2. Assist the Regulatory Affairs Coordinator in briefing Federal, State and local County officials present in the EOF on operational and technical aspects of the emergency event.

3. Assist the Offsite Radiation Advisor in accurately determining the duration of an offsite release.

4.5 **Regulatory Affairs Coordinator**

1. Act as a liaison between the Perry Plant ERO and Federal, State of Ohio and local county officials present in the EOF.

2. Serve as a source of plant and event information for FirstEnergy Liaisons located at the State and local county Emergency Operations Centers (EOCs).

3. Oversee telephone communications with Federal, State and local counties, outside of formal notifications performed in accordance with <EPI-B1>.

4.6 **Information Liaison**

1. Obtain, evaluate and disseminate information concerning the emergency to the Public Information Response Team (PIRT) or Joint Public Information Center (JPIC) in accordance with <EPIOIM>.

4.7 **Access Controller**

1. Control access to the EOF to maintain personnel accountability within the facility per <SPI-0023>.

2. Issue dosimetry to the EOF staff members per <EPI-B11>.

5.0 ACTIONS

5.1 **Emergency Coordinator**

5.1.1 Activation:

1. Direct the EOF Manager, to coordinate the activation of the EOF using the EOF Activation Checklist (PNPP No. 7988, Attachment 1).

   a. If a qualified EOF Manager is not yet present in the EOF, appoint an interim EOF Manager from available personnel.

Goal for declaring the EOF operational is 90 minutes: 15 minutes for ERO notifications; 60 minutes response time when notified; plus 15 minutes to bring facility to an operational status.

2. Contact the TSC Operations Manager to become apprised of the current plant status, any transient conditions and emergency actions underway. <P00049>

3. Utilize the event checklist contained in <EPI-A2> to obtain an accurate appraisal of emergency actions already performed or underway.

4. Periodically, assess personnel staffing levels, through the EOF Manager, to determine if the following minimum staffing exists to declare the EOF operational:

   - Emergency Coordinator
   - Plant Operations Advisor
   - Offsite Radiation Advisor
   - Dose Assessor #1
   - Regulatory Affairs Coordinator
   - EOF Manager
   - "5-Way" Communicator
   - ENS Communicator
   - RMT Communicator

a. If the arrival of a required EOF staff member is delayed, appoint another EOF staff member to cover that position on an interim basis.

b. Direct the EOF Manager to track the arrival of qualified personnel for the following positions which can be manned after the EOF is declared operational: C-1

- o Plant Operations Assistant
- o Environmental Liaison
- o Dose Assessor #2
- o HPN Communicator
- o Information Liaison
- o Support Staff (4)

5. When minimum staffing requirements are met, perform the following steps to declare the EOF operational, using the EOF Activation Checklist:

   a. Use the Intra-Facility PA to brief EOF staff on current plant status, emergency and actions underway, Control Room needs, and TSC priorities.

   b. Announce over the Plant PA System that "the EOF is OPERATIONAL". Record the EOF declared OPERATIONAL in logbook.

   c. Inform the TSC Operations Manager and Shift Supervisor that the EOF is now OPERATIONAL, and establish when the following Emergency Coordinator duties will be transferred to the EOF:

      - event classification per EPI-A1
      - offsite notifications per EPI-B1
      - offsite protective action recommendations (PARS) per EPI-B8

If a notification is pending (within 30 minutes), the EOF should defer assuming offsite notification responsibilities until the upcoming notification is completed.

      1) Notify the EOF Manager prior to assuming offsite notification responsibilities.

      2) Notify the Offsite Radiation Advisor prior to assuming responsibility for offsite PARs.

   d. Announce over the Intra-Facility (EOF) PA the transfer of Emergency Coordinator duties from the TSC to the EOF, record transfer in logbook, and post the transfer of responsibilities on facility status board.

   e. Review and sign EOF Activation Checklist.

5.1.2 Operation:

1. Perform the actions of the Emergency Coordinator as outlined in <EPI-A2>, which include:

   - approval of offsite notifications per <EPI-B1>;
   - approval of offsite protective actions for the general public per <EPI-B8>; and
   - approval of decision to reclassify or terminate the event, or enter into Recovery per <EPI-A1>.

2. Coordinate the overall activities of the ERO to stabilize and reduce the severity of the emergency, and to minimize radiological exposure to the general public.

> The Operations Manager will maintain control of onsite activities under the direction of the Emergency Coordinator. <P00050>

3. Commit or obtain approval to commit Company/Corporate and Central Area Power Coordination Organization (CAPCO) resources as necessary to support emergency efforts.

   a. Utilize available plant management, not presently assigned an ERO duty, to effectively update and interface with Company/Corporate management.

4. Keep apprised of ERO in-plant priorities established by the TSC Operations Manager, and ensure that priorities reflect concerns of Federal, State and local agencies in regards to preventing or mitigating the consequences of an offsite radiological release.

5. Ensure that Federal, State and local County officials in the EOF are adequately briefed on past, current and proposed plant actions.

6. Perform periodic briefings to Federal and State officials at the request of the Regulatory Affairs Coordinator, or local county commissioners as necessary, to explain or resolve questions over the implementation of protective actions or any plant actions being taken by the Perry Plant to control and mitigate the event.

   a. Do NOT become distracted by calls directly from the Nuclear Regulatory Commission (NRC) or other offsite agencies; refer calls and inquiries to the Regulatory Affairs Coordinator.

7. Ensure that the Information Liaison is kept informed of plant conditions and emergency actions underway and that all inquiries from the PIRT or JPIC are answered.

8. Approve Company news statements prior to release to the media. C-1

9. Direct the TSC Operations Manager to establish a Plant Operations Review Committee (PORC) quorum for an unscheduled meeting per <PAP-0103>, if deemed necessary, to address issues/changes requiring PORC review. C-1

10. Approve the use of potassium iodide (KI) for RMT personnel per <EPI-B8> based on the Offsite Radiation Advisor's recommendation.

Responsibility for approving KI use for plant personnel, including EOF staff, remains with the TSC Operations Manager.

11. When deemed appropriate, relax EOF access and dosimetry requirements based on the recommendation of the EOF Manager and Offsite Radiation Advisor (ORA).

12. Authorize the EOF Manager to develop and initiate a relief rotation for EOF staff and RMT personnel.

    a. If radiation levels result from an offsite release restrict the movement of people within the 10-mile EPZ, direct relief personnel to report to a FirstEnergy facility and arrange for transportation to the site.

13. Direct the activation of the BEOF in accordance with <EPI-A11> if, at some time the EOF is not capable of performing its designated function or becomes inaccessible due to an offsite release.

14. Inform the EOF Manager when/if responsibility for making offsite notifications is to be transferred back to the TSC or Control Room.

15. Direct the collection of event records per <EPI-B9> and demobilization of the EOF staff upon termination of the event or activation of the BEOF.

5.2 EOF Manager

5.2.1 Activation:

1. Track the arrival of EOF staff and coordinate the manning of the EOF using the EOF Activation Checklist; periodically brief the Emergency Coordinator on EOF staffing levels.

Once notified, initiate the callout process for Communicators and Support Staff, upon arriving at EOF if onsite or prior to your departure from home, by contacting one (1) Communicator and one (1) clerical member and directing them to conduct further callouts.

2. Assess the personnel resources available at TEC 110/111, and assign communicators and clerical personnel to the following duties as they become available.

   a. Communicators:

      - ("5-Way") State and Local County Ringdown
      - NRC Emergency Notification System (ENS) Circuit
      - FirstEnergy 800 MHz (RMT) Radio
      - *NRC Health Physics Network (HPN) Circuit

   b. Support (Clerical) Staff:

      - *Emergency Coordinator's Log.
      - *Plant Technical Data Board.
      - *Meteorology/Protective Action Status Boards (FirstEnergy Room only).
      - *EOF Clerk/Messenger (Xerox, telecopier, etc.).

* Position does not have to be manned to declare EOF operational.

3. Initiate callouts for additional communicators first, then clerical staff, as necessary using the <Emergency Response Telephone Directory>.

4. Isolate the EOF Ventilation System, using the EOF HVAC Emergency Isolation Checklist (PNPP No. 8055, Attachment 2), if informed that a radiation hazard to the EOF exists.

5. Synchronize facility wall clocks in the FirstEnergy Office, Display Room, NRC/PIRT Room, and at the Access Point with Integrated Computer System (ICS).

This action shall not delay declaring EOF operational.

6. Relocate copier from TEC Library into EOF FirstEnergy Room office, using door key located in EOF keybox.

7. Direct the set-up of TEC110/111, as required to support EOF staff, using phones located in FirstEnergy Room E-Plan Locker.

8. Submit the EOF Activation Checklist to the Emergency Coordinator for review and approval, once minimum staffing has been met and equipment checks performed.

9. Inform the EOF Communicators when the EOF has assumed responsibility for making offsite notifications to the NRC, State of Ohio, and local Counties.

5.2.2 Operation:

1. Coordinate the drafting, review/approval, and transmission of initial and follow-up notification to the Nuclear Regulatory Commission (NRC), State of Ohio, and local counties per <EPI-B1>.

2. Coordinate the drafting, review/approval, and transmission of periodic updates to the Institute of Nuclear Power Operations (INPO) and American Nuclear Insurers (ANI) per <EPI-B1>.

Requests to INPO for technical assistance will continue to originate from the TSC, with the TSC Plant Technical Engineer serving as the point of contact.

3. Conduct telephone callouts for additional EOF Communicators and support staff using the <Emergency Response Telephone Directory>, if required, and assign to the duties listed in Section 5.2.1.2 as they become available.

4. Provide administrative support to the Regulatory Affairs Coordinator and Federal, State and local officials in the EOF, as needed.

5. Arrange and obtain any Company/Corporate or other offsite resources as directed.

6. Resolve any conflicts concerning personnel access to the EOF.

7. Inform the Offsite Radiation Advisor of any requests made over the ENS Circuit to open the NRC HPN circuit; ensure a Communicator has been assigned to the HPN phone in the EOF and at the TSC.

8. When informed that the NRC Regional Site Team will be responding to the Perry Plant, perform the following:

   a. Ensure that the Emergency Coordinator and Regulatory Affairs Coordinator are aware of the team's pending arrival.

   b. Notify the PIRT Manager in the NRC Office, if the PIRT is still in operation, that the NRC Site Team has been dispatched and its estimate time of arrival.

   c. Contact the System Control Center (SCC) Dispatcher at Ext. 824-7400 to place the appropriate personnel on standby to support the installation of NRC radio equipment onsite upon the Site Team's arrival.

9. When informed that a radiation or airborne radiation hazard exists, external to the EOF, isolate the EOF Ventilation System using EOF HVAC Emergency Isolation Checklist.

   a. If EOF temperature in one or more rooms increases or can not be maintained at an acceptable temperature, verify that the ceiling vents are open and baseboard heaters are off in the room(s) in question.

   b. If temperature continues to increase, place the Standby Air Handling Unit in service in accordance with Step 6 on EOF HVAC Emergency Isolation Checklist.

10. Initiate repairs to emergency plan-related communications and the Private Branch Exchange (PBX) and Off-Premise Exchange (OPX) Circuits per <PSI-0007>.

11. Utilize telecopiers, photo copiers (Xerox), and aperture card readers located in the 1st floor Simulator Offices or on the 2nd floor of the Training Center if mechanical problems arise.

12. Report problems in accessing the Perry VAX to the Help Desk at extension 825-3700.

13. Coordinate the relief of EOF staff and RMT personnel at the direction of the Emergency Coordinator by performing the following:

    a. Determine EOF relief personnel needs from key EOF positions, and submit roster to Emergency Coordinator for review and approval.

    b. Request that the ORA determine whether relief personnel should be directed to report to the Perry Plant site or an offsite Company location.

        1) If radiation levels from an offsite release restrict movement in the 10-mile EPZ, coordinate with the TSC/OSC in directing relief personnel when contacted to report to FirstEnergy facility, such as the Concord Service Center (COSC), in arranging for transportation to the site through the Transportation Officer at the Lake County EOC (953-5480), and in establishing radiological monitoring/dosimetry requirements.

    c. Direct available Communicators and support staff to contact required EOF relief personnel utilizing the <Emergency Response Telephone Directory>.

    d. Keep the Emergency Coordinator informed of the status of staff relief efforts.

14. Upon deactivation of the EOF perform the following:

    a. Return EOF HVAC to its normal operating mode.

    b. Coordinate the collection of event records per <EPI-B9>.

    c. Clean-up of the EOF.

    d. Dismiss facility communicators and support staff.

5.3 Offsite Radiation Advisor

5.3.1 Activation:

1. Identify qualified Dose Assessors and an Environmental Liaison from personnel available in the OSC or reporting to EOF Display Room and TEC110/111 as part of personnel accountability.

2. Contact additional personnel utilizing the <Emergency Response Telephone Directory> to ensure a minimum of two (2) Dose Assessors and an Environmental Liaison are available.

   During an off-hour activation, an effort should be made to initiate the callout process, prior to your departure to the EOF from home, by contacting one (1) Dose Assessor and directing him to conduct further callouts.

3. Contact the TSC Radiation Protection Coordinator (RPC) to request Radiation Protection (RP) support for facility radiation monitoring and dosimetry issue activities at the EOF.

4. Assign a Lead Dose Assessor to coordinate performance of the following:

   a. Verify the operability of the Computer-Aided Dose Assessment Program (CADAP) and associated DEC laser printer per <EPI-B7a>.

   b. Ensure that the EOF radiation and airborne monitors are operable per <SOI-D19>.

      1) If either the EOF area or airborne radiation monitors are out of service, direct the HP technician assigned to the EOF to initiate periodic monitoring of EOF habitability.

      Ensure the results of any habitability survey are properly documented.

   c. Ensure that the portal radiation monitor at the Access Point is operational per Attachment 4, or establish a radiological Control Point for personnel contamination monitoring at the EOF access using EOF Access Control Point Set-Up (Attachment 3). <L01314>

   d. Ensure that an RMT Communicator has been assigned by the EOF Manager.

e. Contact the TSC Dose Assessment Area to become apprised of current radiological conditions, protective actions (both recommended and implemented), and the status of the RMTs.

f. Coordinate the formation of a third RMT and upcoming transfer of RMT activities to the EOF with the Environmental Liaison per <EPI-B3>. <P00042, P00059>

g. Brief Dose Assessors on current radiological conditions and assessment activities being performed by the TSC, and prepare for the pending transfer of dose assessment activities to the EOF.

The EOF shall NOT assume responsibility from the TSC for dose assessment and RMT activities until authorized by the Emergency Coordinator.

h. Update radiological and meteorological statusboards in the Display Room.

i. Establish an open HPN line, using Communicator assigned by the EOF Manager, and assume responsibility from the TSC for updating the NRC or offsite dose assessment and radiological release matters.

The TSC will continue to interface with the NRC regarding plant health physics matters.

5. Direct that the Lead Dose Assessor notifies you immediately when ready to accept assessment and plume tracking responsibilities from the TSC.

6. Update the meteorological and protective action status boards in the FirstEnergy Room, and request the EOF Manager to assign support staff member to maintain these status boards.

The ORA is responsible for instructing the status board keeper on how and when to update boards, and for resolving any questions or discrepancies in data.

7. Inform the EOF Manager when your personnel and equipment are available to support EOF operation.

5.3.2 Operation:

1. When authorized by the Emergency Coordinator, notify the TSC RPC and direct the Lead Dose Assessor to assume control of the RMTs and responsibility for dose assessment activities.

2. Ensure dosimetry is issued to EOF staff per <EPI-B11> and coordinate with the TSC in obtaining additional dosimetry in support of RMT and EOF staff relief or augmentation.

3. Direct the Lead Dose Assessor to coordinate the following:

   a. Perform offsite dose calculations per <EPI-B7a> and <EPI-B7b> to evaluate the impact to the general public of an actual or potential release to the environment.

   b. Develop protective action recommendations (PARs) for the general public in accordance with <EPI-B8>, based on plant conditions and dose assessments performed.

   c. If warranted, request a post accident coolant or grab sample through the TSC Radiation Protection Coordinator.

4. Direct the Environmental Liaison to perform the following:

   a. Coordinate with the Lead Dose Assessor in directing RMTs to track, confirm, and assess a release from the Perry Plant per <EPI-B3>.

   b. Utilize RMT and dose projection data to develop a deposition "footprint" of any radiological release for the collection of environmental samples.

5. Review and recommend PARs for the general public to the Emergency Coordinator for approval.

6. Assist the EOF Manager in completing applicable portions of the Initial Notification form (PNPP No. 7794) and Follow-up Notification form (PNPP No. 7795) per <EPI-B1>.

   a. Use Block #8 on the Follow-Up Notification form to indicate whether an elevated release has or is occurring, and to designate if Page 2 of 2 of form is required to provide supplemental release data.

   > Page 2 of 2 on the Follow-Up Notification form can be completed manually by the Dose Assessor or automatically generated by CADAP using <EPI-B7a>.

7. Recommend the use of potassium iodine (KI) by RMT personnel to the Emergency Coordinator for approval per <EPI-B8>.

8. Request emergency exposure limit extensions through the TSC RPC for RMT personnel per <HPI-B0003 >.

9. When notified by the NRC to maintain an open HPN line after the EOF is operational, perform the following: <B00626>

   a. Direct the Lead Dose Assessor to establish an open HPN line in the Display Room.

   b. Notify the TSC Radiation Protection Coordinator.

   c. Assume responsibility from the TSC for interfacing with the NRC on dose assessment matters only.

10. Ensure that the Meteorology/Protective Action, Plant Technical Data, and Radiological Data statusboards in both the FirstEnergy and Display Rooms are kept updated.

11. Verify or coordinate determination of reactor shutdown time and/or release duration with the Plant Operations Advisor, if needed.

12. Periodically apprise the Emergency Coordinator of dose assessment and plume tracking activities as well as radiological conditions in the EOF.

13. Provide plant radiological and meteorological information, as requested, as well as dose projections and protective action calculation results to representatives from the State of Ohio and the NRC Site Team present in the EOF.

14. Periodically check radiation levels on both the EOF area and airborne monitors.

   a. If area or airborne radiation readings exceed normal levels, direct the EOF Manager to isolate the EOF Ventilation System; consider recommending the evacuation of any unnecessary EOF support personnel and issuance of high range dosimetry per <EPI-B11>; and direct the RP technician present to initiate periodic habitability surveys.

Consideration should be given towards the activation of the BEOF if radiation levels become of concern in the EOF or restricted access to the EOF due to external radiation level prevent the effective operation of the facility.

   b. If either monitor becomes out of service, direct the RP technician present in the EOF to initiate periodic monitoring of EOF habitability.

15. When required, direct the Environmental Liaison to coordinate the collection, packaging and shipment of environmental samples per <EPI-B10>.

16. Provide instructions to EOF staff and RMTs on the collection and processing of dosimetry as part of staff relief or facility deactivation.

5.4 Plant Operations Advisor

5.4.1 Activation:

1. Contact the Unit Supervisor or at least one (1) Supervising Operator from the training shift Control Room crew to serve as Plant Operations Assistant.

2. Contact the Operations Advisor to become apprised of current or expected plant conditions, emergency actions, ERO in-plant priorities, and Control Room operations underway.

3. Check to ensure the ICS and associated graphic printer is operable.

4. Update the Plant Technical Data Statusboard, and request from the EOF Manager that a support staff member be assigned to maintain this statusboard.

5. Direct the Plant Operations Assistant, upon his arrival, to:

   a. Provide updates to the Plant Technical Data Statusboard keeper, and instruct on how and when to update board (Ref.: ICS Screen #157).

   b. Resolve any questions or discrepancies regarding statusboard data.

   c. Monitor plant system and fission product barrier status using ICS.

   d. Assist the Dose Assessors, when requested, in determining core state, release pathway, time of shutdown, and release duration for an on-going or potential radiological release. <P00048>

   e. Support operational duties of the Plant Operations Advisor listed in Section 5.4.2.

6. Inform the EOF Manager when your personnel and equipment are available to support EOF operation.

7. Brief the Emergency Coordinator on plant conditions and emergency actions underway to mitigate and/or terminate the event.

5.4.2 Operation:

1. Apprise EOF staff on plant conditions, integrity of fission product barriers, and emergency action taken or being considered by the TSC and Control Room.

2. Provide an operational insight, and interpret plant design and system operation issues for the Emergency Coordinator.

3. Assist the Regulatory Affairs Coordinator, when requested, in clarifying operational and technical aspects of the event to Federal, State and local counties officials in the EOF.

4. Assist the ORA and Dose Assessors in the performance of offsite dose and protective action calculations.

5. Ensure that the Plant Technical Data Statusboard is kept updated by the Plant Operations Assistant.

6. Direct the Plant Operation Assistant's (POA) activities as required to ensure that the above actions are addressed in a timely accurate and thorough manner. <P00052>

5.5 Regulatory Affairs Coordinator

5.5.1 Second Regulatory Affairs Coordinator (Reporting to EOF Prior to Activation):

1. Obtain a briefing from the TSC (on-call) Regulatory Affairs Coordinator on plant status and emergency events, then report to the EOF.

2. Upon the arrival of the State/local county representative(s), perform the following:

   a. Identify the designated work areas in the EOF.

   b. Provide an overview of plant conditions, event status and prognosis, and ERO priorities.

3. Arrange "Escorted Visitor" access to the TSC through the TSC Security Coordinator, if deemed appropriate, to keep individuals apprised of events.

4. If offsite interest in the event justifies, recommend to the TSC Operations Manager the activation of the EOF.

5.5.2 EOF Operational:

Once the EOF is declared operational, the TSC (on-call) Regulatory Affairs Coordinator (RAC) will relocate to the EOF. The On-Call EPU Representative, when available, can also be used to support RAC duties.

C-1

1. Direct the "5-Way" Communicator to announce over the circuit when the EOF is operational and request that Lake County open the EOF drop off the State/County Executive Discussion Line (EDL). C-1

2. Provide a preliminary update on changing event and protective action recommendation status, or significant changes in plant conditions over the EDL, as a supplement to <EPI-B1> notifications, and respond to questions and inquiries for State/local county Executive Group members. C-1

3. When notified by the access controller of the arrival at the EOF of government officials, perform the following:

   a. Authorize access for any individuals not listed on the EOF Access List and obtain plant dosimetry.

   b. Direct the individual(s) to the State/Local Room or NRC Office for an initial briefing.

   c. Provide a briefing on plant conditions, event, ERO in-plant priorities, and major emergency actions being planned or underway.

   d. Discuss the layout of the EOF, including personnel staffing, the location and operation of facility equipment.

   e. Provide the Federal, State and local county liaisons with copies of previously communicated initial and follow-up notification forms, and any other requested information.

(INTENTIONALLY BLANK)

f. Assist these individuals in becoming familiar with EOF operations and staffing, and their designated work area(s).

State Representative	-	FirstEnergy Room (State desk)
County Liaisons	-	State/County Office
NRC Site Team	-	NRC Office and counterpart seating in FirstEnergy and Display Rooms.

Government officials should be given unlimited access to EOF work areas; however, the Regulatory Affairs Coordinator should assist these officials as necessary to prevent them from interfering with the duties being performed by EOF staff members.

3. Provide periodic updates to Federal, State and local county representatives in the EOF; ensure representatives are included in facility status briefings.

4. Serve as the point of contact for the FirstEnergy Liaisons located in the State and County EOCs.

5.6 Records

5.6.1 Records Handling

1. The records generated by emergency response personnel will be collected and maintained by Emergency Planning Unit (EPU) pursuant to <EPI-B9>. The Emergency Records Package will be transferred to Records Management pursuant to <PAP-1701>.

5.6.2 Records Capture

The following records are generated by this document:

Quality Assurance Records

EOF Activation Checklist (PNPP No. 7988)
EOF HVAC Emergency Isolation Checklist (PNPP No. 8055)

Non-Quality Records

None

EOF ACTIVATION CHECKLIST
(TO BE COMPLETED BY THE EOF MANAGER)

PNPP No. 7988 Rev. 1/26/01 EPI-A8

A. ☐ EOF rooms are unlocked [NOTE: Master key located in keybox outside EOF Records Room.]

B. Assess personnel resources available in EOF and TEC110 / 111 and assign the duties listed below to available communicators and support staff. Conduct additional callouts as needed.

C. Verify EOF manning levels:

Minimum EOF Staffing Requirements:
- ☐ Emergency Coordinator
- ☐ Plant Operations Advisor
- ☐ Offsite Radiation Advisor
- ☐ Dose Assessor #1
- ☐ Regulatory Affairs Coordinator
- ☐ EOF Manager
- ☐ "5-Way" Communicator
- ☐ ENS Communicator
- ☐ RMT Communicator

POSITIONS NOT REQUIRED TO DECLARE EOF OPERATIONAL:
- ☐ Plant Operations Assistant
- ☐ Environmental Liaison
- ☐ Dose Assessor #2
- ☐ HPN Communicator
- ☐ Information Liaison
- ☐ Support Staff #1 - Emergency Coordinator's Log
- ☐ Support Staff #2 - Plant Technical Data Board
- ☐ Support Staff #3 - Plant Radiological Data Board
- ☐ Support Staff #4 - EOF Clerk / Messenger

D. Direct available communicators to test the following circuits:

- ☐ Intra-Facility (EOF) PA
- ☐ Turn up Plant PA in EOF FirstEnergy Room and Display Rooms

E. ☐ Isolate the EOF HVAC per the Isolation Checklist (PNPP No. 8055) if a potential or actual radiation or airborne hazard to the EOF exists.

F. ☐ EOF Access Controller stationed. [NOTE: Notify Security Coordinator or SNSO if security officer is not yet stationed.]

NOT REQUIRED TO DECLARE FACILITY OPERATIONAL

G. Facility wall clocks in the Display Room, FirstEnergy Room, & Access Point synchronized with ICS.

Submitted By: _____ ____/____/____ @ _____ hours
EOF Manager Date Time

EOF ACTIVATION CHECKLIST
(TO BE COMPLETED BY THE EMERGENCY COORDINATOR)

PNPP No. 7988 Rev. 1/26/01

EPI-A8

1. ☐ When the minimum staffing requirements are met and the EOF is ready to be declared OPERATIONAL, brief EOF staff on current plant conditions, emergency actions underway, Control Room needs, and TSC priorities.

2. ☐ Announce over the Plant PA System that "the EOF is OPERATIONAL". Record time EOF declared OPERATIONAL in logbook.

3. ☐ Inform the TSC Operations Manager and Shift Supervisor that the EOF is now OPERATIONAL, and establish when the following Emergency Coordinator duties will be transferred to the EOF:
   - event classification per EPI-A1
   - offsite notifications per EPI-B1
   - offsite protective action recommendations (PARs) per EPI-B8

   ☐ Notify the EOF Manager prior to assuming offsite notification responsibilities.

   ☐ Notify the Offsite Radiation Advisor prior to assuming responsibility for offsite PARs.

4. Announce over the Intra-Facility (EOF) PA the transfer of Emergency Coordinator duties from the TSC to the EOF, record transfer in logbook, and post the transfer of responsibilities on facility status board:

   ☐ Event Classification ☐ Offsite Notifications ☐ Offsite Protective Action Recommendations

Declared Operational: _____ (Emergency Coordinator) _____/_____/_____ (Date) @ _____ (Time) hours

EOF HVAC EMERGENCY ISOLATION CHECKLIST

PNPP No. 8055 Rev. 11/25/94 EPI-A8

The following procedure is used to shift the first floor TEC/EOF HVAC system (M53) from "NORMAL" operation to EOF "EMERGENCY ISOLATION". Refer to M53 system diagrams D-912-640/641 as necessary.

1. ☐ Obtain the key for the 1st floor Mechanical Equipment Room from the EOF Emergency Key Box.

2. Proceed to first floor Mechanical Equipment Room.

   NOTE: All switches are located on Master Control Panel, 0M53-P001.

   ☐ a. Position or verify "FIRST FLOOR SMOKE DAMPER" Switch (S3) to "AUTO".

   ☐ b. Position or verify the "PLENUM OUTSIDE AIR INTAKE DAMPER F1" Switch (S6) to "CLOSE".

   ☐ c. Position the "FIRST FLOOR DAMPER MODE SELECTOR" Switch (S5) to "RECIRC".

   ☐ d. De-energize either air handling unit 0M-B030A or 0M53-B030B by placing its respective switch "0M53-B030A FIRST FLOOR AHU" (S1) or "0M53-B030B FIRST FLOOR AHU" (S2) to "OFF" and energize the other air handling unit by placing or verifying switch (S1) or (S2) to "AUTO".

   ☐ e. Position "EMERGENCY ISOLATION SWITCH" (S7) to "EMERG ISOL".

3. ☐ Proceed to north-south corridor on the west side of the building and verify Isolation Door between TEC amd EOF closed.

4. ☐ Proceed to north-south corridor on the east side of the building and verify Isolation Door between TEC and EOF closed.

   The EOF HVAC is now in the Emergency Isolation Mode.

   NOTE: Switch the sign for Ventilation Status in the Display Room and in the CEI Room to "Emergency Recirculation Mode".

5. If EOF temperature in one or more rooms increase or can not be maintained at an acceptable temperature, verify that the ceiling vents are open and base board heaters are off in the room(s) in question.

6. If temperature continues to increase, place the Standby AHU in service; this unit was previously secured from Step 2d.

   Place 0M53B030B first floor AHU (S-2) or 0M53B030A first floor AHU (S-1) to Auto. Deenergize previously operating train by placing 0M53B030B first floor AHU (S-2) or 0M53B030A first floor AHU (S-1) to OFF.

7. Admit Filtered outside air to the EOF as desired for Ventilation purposes (to reduce stuffiness/CO_2 level) by performing the following at Master Control Panel, 0M53-P001.

   ☐ a. Open Damper 0M53-F048 (F1) by placing "PLENUM OUTSIDE AIR INTAKE DAMPER" Control Switch (S6) to OPEN.

   ☐ b. When outside air is no longer required Close Damper 0M53-F048 (F1) by placing "PLENUM OUTSIDE AIR INTAKE DAMPER" Control Switch (S6) to CLOSE.

8. If airborne activity levels increased significatly in the EOF with the HVAC in the Emergency Isolation mode, request via the TSC that OSC personnel be dispatched to the EOF to verify visually that the isolation dampers are in the closed position.

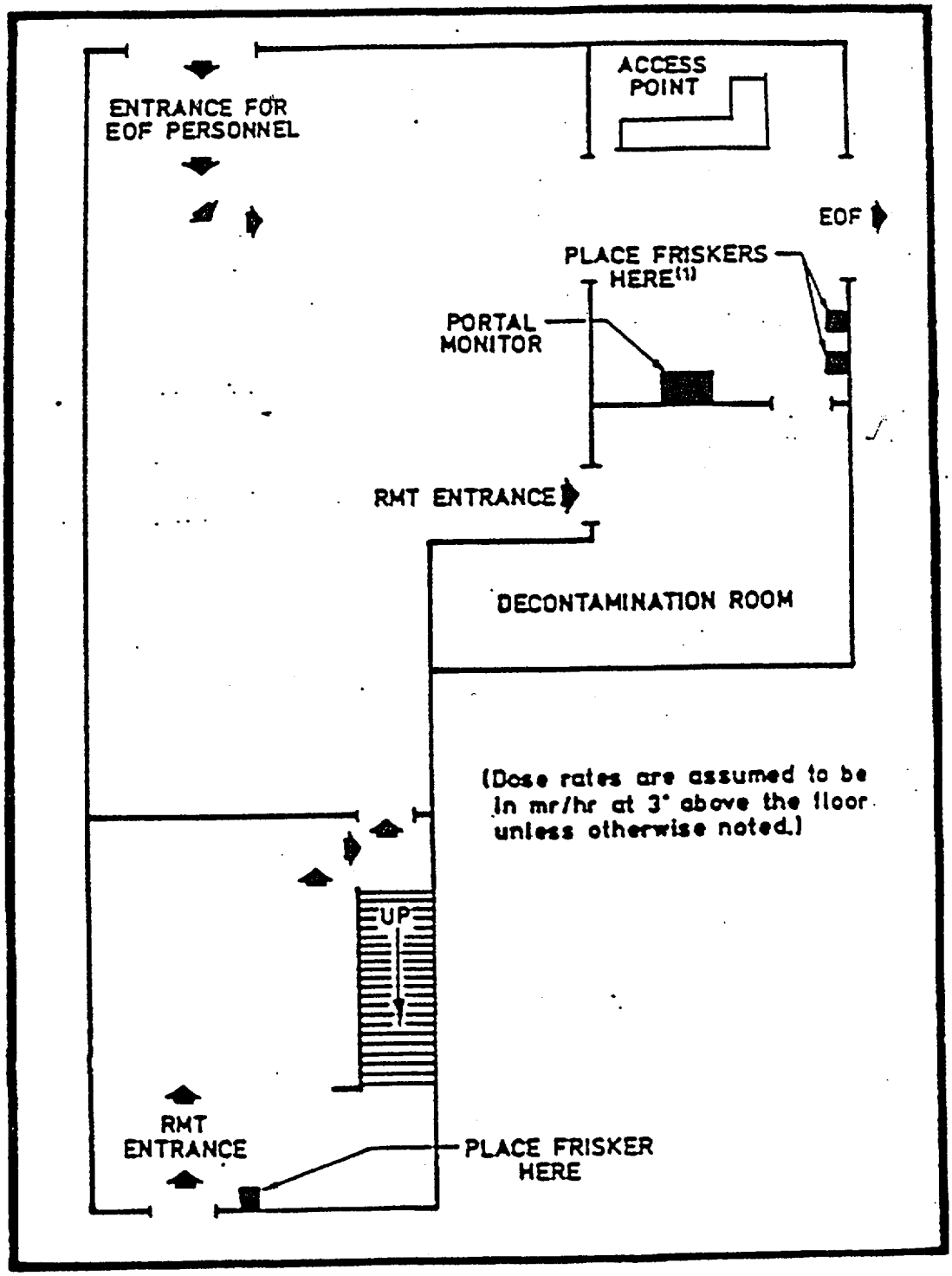
To return system to "NORMAL" operation:

9. ☐ Proceed to first floor Mechancial Equipment Room.
   NOTE: All switches are located on Master Control Panel, 0M53-P001.

   ☐ a. Position "EMERGENCY ISOLATION SWITCH" (S7) to "NORMAL"
   ☐ b. Return the air handling units 0M53-B030A and 0M53-B030B to Normal operation by placing or verifying the respective switches "0M53-B030A First Floor AHU" (S1) and "0M53-B030B First Floor AHU" (S2) to "AUTO"
   ☐ c. Position the "FIRST FLOOR DAMPER MODE SELECTOR" Switch (S5) to "AUTO".
   ☐ d. Position or verify the "PLENUM OUTSIDE AIR INTAKE DAMPER F1" Switch (S6) to "CLOSE".
   ☐ e. Position or verify "FIRST FLOOR SMOKE DAMPER" Switch (S3) to "AUTO".

10. The EOF is now in Normal Operation. Switch the sign for Ventilation Status in the Display Room and in the CEI Room to "Normal Mode".

EOF ACCESS CONTROL POINT SET-UP



(1) Set friskers if portal monitor is not operational

PORTAL RADIATION MONITOR RESPONSE CHECK <L01314>

Response check the Gamma-10 portal radiation monitor using the following steps:

1. Energize the portal monitor.

   NOTE: When the Gamma 60 is initially energized, a 30 second background count is taken. Wait for completion of the background count before proceeding.

2. Obtain check source from Cabinet #5 in the EOF Decontamination Room and proceed to the front of portal monitor.

   NOTE: Portal monitor are very sensitive. If Gamma 60 alarms as you proceed to the front of monitor, remove the source from the area and press the black reset button.

3. Verify that each Gamma 60 portal monitor detector (6 total) responds to the check source by producing both an audible and visual alarm.

4. Initial Response Check Calendar, Form #6883, which is located on the exit side of the portal detector, upon completion of a satisfactory response check.

5. If the Gamma 60 portal monitor does not respond properly to the response check, perform the following:

   - Prepare and attach a DO NOT USE tag to the portal monitor.
   - Notify the Lead EOF Dose Assessor.
   - Stage frisking stations outside the EOF Decontamination Room per Attachment 3.