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U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop O-P1-17  
Washington, DC 20555

Subject: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
License No. DPR-64  
**Objectives for the October 31, 2001 Emergency  
Preparedness Partial Participation Exercise**

Dear Sir:

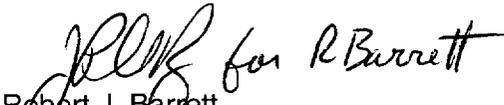
In accordance with 10 CFR 50.47 and 10 CFR 50, Appendix E Entergy plans to exercise its emergency plan by conducting a partial participation emergency preparedness exercise on October 31, 2001. This submittal is provided for NRC review. Attachment I describes the purpose, scope and objectives for the Indian Point 3 Partial Participation Emergency Preparedness Exercise.

Entergy intends to test the site response to a simulated emergency condition at Indian Point 3. Limited participation by New York State and the surrounding counties is anticipated.

There are no new commitments made by Entergy with this letter.

Should you or your staff have any questions, please contact Mary Ann Wilson, Site Emergency Planning Coordinator, at (914) 736-8404.

Very truly yours,

  
Robert J. Barrett  
Vice President Operations  
Indian Point 3 Nuclear Power Plant

Attachment  
cc: See next page

AD45

cc: Mr. Hubert J. Miller  
Regional Administrator  
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U.S. Nuclear Regulatory Commission  
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U.S. Nuclear Regulatory Commission  
Resident Inspectors' Office  
Indian Point 3 Nuclear Power Plant

**INDIAN POINT 3 (IP3) NUCLEAR POWER PLANT**  
**2001 PARTIAL PARTICIPATION EXERCISE**  
**October 31, 2001**

**PURPOSE / SCOPE / OBJECTIVES**

**A. PURPOSE**

The purpose of this Exercise is to demonstrate the ability of the IP3 Emergency Response Organization (ERO) to respond to a simulated emergency at IP3. It is designed to demonstrate the capabilities of the Emergency Response Facilities including the use of the Emergency Response Plan and Procedures. It is also an opportunity for Emergency Response Organization personnel to receive practical training in their specific emergency response responsibilities.

**B. SCOPE**

The scenario is designed to activate and implement the IP3 Emergency Plan and Procedures through various emergency action levels. Although the scenario accurately simulates operating events, it is not intended to be used to assess the operators' diagnostic capabilities but rather provides sequences which ultimately demonstrate the operators' ability to respond to events which result in exercising emergency plans and procedures. Free play is encouraged and the controllers will intercede only if operator/player action prematurely terminates the exercise or excessively deviates from the scenario time line.

The scenario is developed and reviewed by a committee consisting of representatives from many disciplines including Emergency Planning, Operations, Training, Maintenance, Instrumentation and Control, Chemistry and Radiological Engineering. The scenario is also run on the IP3 control room simulator to develop data and verify sequences and expected responses.

The Exercise will be conducted during normal work hours and will last approximately four (4) hours.

Since this is a Partial Participation Exercise, participation by Orange, Putnam, Rockland, and Westchester counties as well as New York State will be limited. Support is anticipated from Indian Point 2 for offsite survey teams. Indian Point 3 will activate the following Emergency Response Facilities: Control Room (Simulator), Operations Support Center, Technical Support Center, Alternate Emergency Operations Facility and Joint News Center.

At no time will the exercise be permitted to interfere with the safe operation of IP3. To ensure this goal is met, plant management may suspend the exercise, or any part of it, for any period of time should a plant safety issue arise.

C. **OBJECTIVES**

The major elements that are to be included in every exercise are incorporated into the objectives for this exercise. In addition, five (5) of the elements that should be exercised over a six (6) year period are included in the objectives and are as follows:

1. Real time activation of the Joint News Center (JNC)
2. Use of fire control teams
3. Use of first aid and/or rescue teams
4. Assembly and accountability (Evacuation of onsite personnel will be simulated)
5. Use of an alternate facility

The following objectives shall be demonstrated. They were used to develop the exercise scenario and will provide a framework for drill observers to evaluate exercise performance.

**Emergency Response Facilities:**

a. **Control Room (CR) (Simulator)**

1. Facility Management and Control - The shift manager will coordinate and oversee control room response. If there is a turnover to the Plant Operations Manager (POM), the facility management and control will be the responsibility of the POM. This will also include the use of appropriate procedures.
2. Analysis of Plant Conditions and Corrective Actions - Control Room staff will correctly interpret control room instrument displays and have the ability to recognize that events are progressing abnormally.
3. Detection and Classification of Emergency Events - Control Room staff will classify an emergency using emergency action levels (EALs) on the basis of plant conditions.
4. Onsite Notifications and Communications - Control Room staff will notify onsite personnel via the plant page of the following:
  - emergency condition,
  - emergency classification, and
  - plant updates approximately every 30 minutes.

Control Room staff will communicate with each other and the other facilities, and be briefed on plant conditions.

5. Offsite Notifications and Communications - The control room staff will notify State/Counties via the RECS line. The use of back-up methods will be demonstrated only if the normal method fails to operate. The initial notification will be made within 15 minutes of the emergency declaration and will include the New York State (NYS) Radiological Data Form Part I information. The control room staff will notify the Institute for Nuclear Power Operations (INPO), the NRC, and appropriate contracted insurance companies via normal methods.
6. Implementation of Onsite Protective Actions - The control room staff will initiate and consider onsite protective actions until the Alternate Emergency Operations Facility (AEOF) is activated, as required (e.g., accountability, potassium iodide (KI) issuance, evacuation of non-essential personnel, exposure authorization, etc.).

Note: This objective may not be demonstrated.

7. Dose Assessment - Personnel will use approved procedures for dose assessment including meteorological information.

b. **Technical Support Center (TSC)**

1. Staffing and Activation of the TSC - The TSC will be staffed within 60 minutes of the Alert or higher classification. Provisions for 24 hours of continuous operation of the site emergency response organization will be made through the use of a two (2) shift roster.
2. Facility Management and Control - The TSC Manager (TSCM) will coordinate and oversee technical support activities. This will also include the use of appropriate procedures.
3. Accident Assessment - Personnel activating the TSC will adequately and accurately perform the following tasks:
  - initially assess and continuously reassess reactor conditions and,
  - maintain an overview of the reactor and plant conditions using the expertise of technical staff and information provided to them.
4. Communications - TSC staff will communicate with each other and other facilities, and will be briefed on plant conditions.
5. Assistance and Support to the CR - The TSCM will oversee the analysis and corrective action response. Performance of other

functions should not interfere with direction or determination of corrective action. Corrective actions will be implemented in an effective and timely manner.

c. **Alternate Emergency Operations Facility (AEOF):**

The EOF will be uninhabitable prior to the start of the Exercise.

1. **Staffing and Activation of the AEOF** - The AEOF will be staffed following the Alert classification or higher. Provisions for 24 hours of continuous operation of the site emergency response organization will be made through the use of a two (2) shift roster.
2. **Facility Management and Control** - The Emergency Director (ED) will oversee all activities performed at the AEOF. This will also include the use of appropriate procedures. The ED will coordinate all onsite and offsite IP3 emergency procedures.
3. **Accident Assessment and Classification** - Personnel activating the AEOF will adequately and accurately perform the following tasks:
  - Use EALs, as appropriate, to confirm or reclassify an emergency, and
  - Maintain an overview of the reactor and plant conditions using the expertise of the staff and the information provided.
4. **Offsite Dose Assessment** - If a release is anticipated or is in progress, the appropriate AEOF staff will correctly assess and integrate information from the reactor systems' status and trends, radiological monitoring, source term assumptions, and meteorological information (current and forecast) to define the magnitude and location of the offsite impact.
5. **Offsite Monitoring** - If a release is anticipated or in progress, offsite monitoring teams will be deployed following vehicle equipment check and a briefing. Teams will be dispatched to appropriate locations to intercept the plume and take samples (radiation measurements - gamma and beta readings and air samples). The results of monitoring will be used to redefine the source term and projected doses.
6. **Protective Action Decision Making** - The appropriate AEOF staff will assess the status of the reactor core, reactor systems and containment to recommend onsite and offsite protective actions.

The following will be considered in determining what protective actions are appropriate:

- Current reactor and plant status,
  - Prognosis of the accident, and
  - Current and projected weather conditions.
7. Onsite Notifications and Communications - The AEOF personnel will communicate with each other, with the other facilities, and be briefed on plant conditions.
8. Offsite Notifications and Communications - Upon turnover from the CR, the AEOF will commence notifications to the State/Countries via the RECS line. The use of back-up methods will be demonstrated only if the normal method fails to operate. The initial notification will be made within 15 minutes of the emergency declaration and will include NYS Radiological Data Form Part I information.
9. Implementation of Protective Actions - The appropriate AEOF staff will initiate and consider onsite protective actions, as required (e.g., accountability, KI, evacuation of non-essential personnel, emergency exposure authorizations, etc.).
- d. **Operations Support Center (OSC):**
1. Staffing and Activation of the OSC - The OSC will be staffed within 60 minutes of the Alert or higher classification. Provisions for 24 hours of continuous operation of the site emergency response organization will be made through the use of a two (2) shift roster.
2. Facility Management and Control - The OSC Manager (OSCM) will coordinate and oversee operations support activities. The OSCM will ensure the use of procedures.
3. Repair and Corrective Actions - Personnel performing specific repair and corrective actions will be assigned in a timely manner and with clear instructions. Teams dispatched from the OSC will be briefed, tracked and debriefed.
4. Communications - OSC staff will communicate with each other and the other facilities, and will be briefed on plant conditions. Communications with the teams dispatched from the OSC will be maintained.
5. Implementation of Protective Actions - Appropriate OSC staff will ensure habitability of the TSC and OSC.

e. **Offsite Monitoring:**

1. **Activation and Deployment** - Vehicles will be available and readily accessible to transport the teams. Calibrated instrumentation and equipment will be available for monitoring and for taking samples. Instrumentation to detect radioiodine at levels as low as  $10^{-7}$  microCi/cc under field conditions will be available. Teams will be equipped with a communication system. They will be briefed on plant, radiological, and meteorological conditions prior to dispatch and periodically updated.
2. **Surveys, Sampling and Analysis:** - Teams will be able to locate sampling/monitoring points. Teams will be knowledgeable in collecting and marking samples, and in reading monitoring results in accordance with approved procedures. Teams will keep track of their radiological exposures. Monitoring results will be promptly and correctly reported back to the AEOF.

f. **Security and Accountability:**

1. **Security** - Access control will be maintained at the site and will not interfere with the response to an emergency. Security practices and procedures will not impede movement and access of site operating and response personnel to plant areas during an emergency situation.
2. **Accountability** - Conduct of protected area accountability will be achieved within 30 minutes of the declaration of a Site Area Emergency or a General Emergency.
3. **Search and Rescue** – Security will conduct search and rescue upon ED direction.

g. **Joint News Center (JNC):**

1. **Staffing and Activation of the JNC** – JNC staff will utilize real-time activation of the JNC.
2. Information disseminated to the media/press by the licensee will be accurate and timely. News releases and briefing notes will be properly coordinated with the ED.
3. Communication equipment will be available. Licensee personnel giving briefings will be technically qualified and able to answer media questions accurately and in a timely manner.

h. **Fire Control Teams:**

1. The use of the Fire Brigade will be demonstrated.

**Exercise and Drills:**

This exercise incorporates the following drills:

1. Communication Drill - The IP3 staff will notify and communicate with state, and local governments, and field assessment teams.
2. Health Physics/Radiological Monitoring Drill - The health physics staff will respond to and conduct radiation measurements.
3. Fire Drill – The IP3 Fire Brigade will respond to a fire within the plant as per site fire procedures.