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United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

RE: Nine Mile Point Unit 1
 Docket No. 50-220
 DPR-63

 Nine Mile Point Unit 2
 Docket No. 50-410
 NPF-69

Gentlemen:

Enclosed please find a copy of the following emergency procedure revision for Niagara Mohawk's Nine Mile Point Nuclear Station:

EPMP-EPP-01, Revision 13, "Maintenance of Emergency Preparedness"

This procedure revision is being submitted as required by Section V to Appendix E of 10 CFR Part 50. Should you have any questions, please feel free to contact Mr. James D. Jones, Director of Emergency Preparedness at (315) 349-4486.

Very truly yours,


John T. Conway
Vice President Nuclear Generation

/kcm

Enclosure

pc: Mr. H.J. Miller, Regional Administrator, Region I (1 copy)
 Mr. G.K. Hunegs, Senior Resident Inspector (1 copy)
 Mr. P.S. Tam, Senior Project Manager, NRR (2 copies)
 EP PPF

A045

NINE MILE POINT NUCLEAR STATION
EMERGENCY PLAN MAINTENANCE PROCEDURE

EPMP-EPP-01

REVISION 13

MAINTENANCE OF EMERGENCY PREPAREDNESS

TECHNICAL SPECIFICATION REQUIRED

Approved by:
L. E. Pisano

L. E. Pisano
Manager - Nuclear Training

9/13/01
Date

THIS IS A FULL REVISION

Effective Date: 09/14/2001

PERIODIC REVIEW DUE DATE: SEPTEMBER 2002

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1.0 PURPOSE

To provide guidance in the scheduling of recurring emergency preparedness activities and instruction for the review and approval of emergency preparedness controlled documents and materials to ensure the effective maintenance of the Emergency Preparedness Program.

2.0 RESPONSIBILITIES

2.1 Director Emergency Preparedness

- Schedules all emergency preparedness activities within the required frequency to ensure that the Emergency Response Organization, facilities and equipment are maintained in a constant state of readiness.
- Ensures that emergency preparedness controlled documents and materials are developed, maintained, and revised in accordance with station document administrative requirements and Federal regulations and that the actions implemented by the document are consistent with the philosophy of the Emergency Preparedness Plan and Program.

2.2 The Manager-Nuclear Training

Ensures that personnel assigned to emergency plan duties receive appropriate emergency preparedness training and maintains exercise participant records as evidence of training received through active participation in an emergency exercise or drill.

2.3 The Manager-Nuclear Communications and Public Affairs

- Provides Emergency Preparedness with the support necessary to maintain the public information process, specifically:
 - a. The collection, coordination and development of public information.
 - b. The publication, distribution and historical documentation of public information.
 - c. The development and conduct of the information presentation to the news media.

3.0 PROCEDURE

3.1 Scheduling of Emergency Preparedness Activities

The Director Emergency Preparedness shall develop and maintain a Drill, Exercise and Objective Schedule and an Annual Emergency Preparedness Activities Schedule.

- 3.1.1 Schedules may include the activities and objectives listed in Attachments 1 and 2, EPMP-EPP-04 and any additional items deemed necessary to maintain the Emergency Preparedness Program.
- 3.1.2 Periodic requirements for the testing of emergency related systems and equipment may be demonstrated during a drill or exercise.
- 3.1.3 Schedules should be developed in cooperation and coordination with station and offsite organizations involved with the particular activity.
- 3.1.4 Documentation of each item completed on the Activities Schedule must be provided. This documentation may include Training Records, attendee lists, reports and/or letters to file indicating when and how the item was completed.

3.2 **Drill and Exercise Report Documentation**

The Director Emergency Preparedness shall ensure that drill reports are developed and issued in accordance with EPMP-EPP-04, "Emergency Exercise/Drill Procedure".

(C2) 3.3 **Annual Recertification of the Nine Mile Point Emergency Preparedness Program**

- 3.3.1 The Director of Emergency Preparedness shall recertify the Emergency Preparedness program by performing the following actions on an annual basis:
 - a. Verify that any new formal commitments have been or are scheduled to be incorporated into the appropriate emergency preparedness documents.
 - b. Verify that drill, exercise, audit or assessment findings have been or are scheduled to be incorporated into the appropriate emergency preparedness documents.
 - c. Review current letters of agreement to ensure consistency with the Site Emergency Plan.
 - 1. This review should include verification of the continuity of scope and effective dates of each letter of agreement.
 - d. Verify that emergency plan implementing procedures have been periodically reviewed in accordance with NIP-PRO-02.
 - e. Verify the completion of all annual drill requirements.
 - f. Perform actions necessary to correct discrepancies found in executing Steps 3.3.1.a-e of this procedure

(C2) 3.4 **Annual Technical Specification Review of Emergency Preparedness Documents**

- NOTES:**
1. This review is performed to satisfy Unit 1 and Unit 2 Technical Specification 6.5.2.8.
 2. Qualified Technical Reviewers (QTRs) are considered plant supervisory staff.
 3. QTR review performed as part of a procedure revision shall suffice as the review required by Step 3.4.1 of this procedure **ONLY** if changes recommended as part of that review are processed in accordance with Step 3.4.2.

3.4.1 The following shall be reviewed by plant supervisory staff on an annual basis:

- Site Emergency Plan (SEP)
- Emergency Plan implementing procedures listed in Appendix C of the SEP
 - a. The procedure review shall be documented on an Administrative Procedure Control Form in accordance with NIP-PRO-02.

3.4.2 IF the review performed in accordance with Step 3.4.1 results in recommending changes, then:

- a. The changes shall be approved by the Plant Manager
- b. The revised documents shall be transmitted to the Vice President - Nuclear Generation and the Chairman of the Safety Review and Audit Board.

3.5 **Revision of Controlled Emergency Preparedness Documents**

3.5.1 Revision to the Site Emergency Plan, EIPs and EPMPs shall undergo an effectiveness review in accordance with Attachment 3 of this procedure.

3.5.2 Revisions to emergency action levels:

- a. shall have the concurrence of the State and County
- b. may be reviewed with J. A. FitzPatrick.

3.5.3 The Director Emergency Preparedness shall ensure distribution of all approved revisions to the Emergency Plan or Implementing procedures to the NRC within 30 days of the effective date as follows:

3.5.3 (Cont)

NOTE: "No change periodic review" (NCPR) does not constitute a procedure or plan change, therefore submittal to the NRC is NOT required.

- a. One copy of any procedure change with signed original letter to:

Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555
- b. Two copies of any procedure change to NRC Region 1 office.
- c. One copy of any procedure change to NRC Resident Inspector.

3.6 Control and Use of Emergency Preparedness Job Aids

3.6.1 The Director Emergency Preparedness or designee shall review, approve and authorize use of all emergency preparedness job aids.

3.6.2 Personnel shall develop job aids on a suitable medium and ensure:

- Handwritten or drawn aids are avoided to the extent practicable.
- The information presented on the job aid is clear, legible and useable.
- If the proposed job aid provides any information that should be incorporated into the permanent procedures, initiator will provide a completed Procedure Change Evaluation (PCE) and not the job aid request.
- Job aid is not intended to bypass or reflect requirements of procedure(s).

3.6.3 Personnel requesting a job aid shall initiate an Emergency Preparedness Job Aid Form (Attachment 4) by completing the Originating Information section and submitting it to the Director Emergency Preparedness.

3.6.4 The Director Emergency Preparedness or designee shall review the request for the job aid document. If the request is rejected, inform the originator. If not, perform the following:

NOTE: Verify that the Job Aid content does not bypass the normal plant procedure change process. If a procedure change is appropriate, request the originator to complete a PCE and reject the job aid.

- a. Document approval by signing and dating the form.

3.6.4 (Cont)

- b. Assign a sequence number to the form using the Job Aid Index Log (Attachment 5).
- c. Complete the necessary information in the EP Job Aid Index Log.

3.6.5 Generate and post the job aid.

- a. Job aids shall be marked with the assigned job aid number, effective date and a reference to the originating/source document including its revision number, if applicable.
- b. Ensure that job aids are placed in close proximity to where they will be used and in a protective cover or lamination.

3.6.6 Requests to remove a posted job aid shall be submitted to the Director Emergency Preparedness by any one in the initiator organization.

3.6.7 The Director Emergency Preparedness or designee shall review to approve the removal of posted job aids or can remove any job aids, if required, by signing and dating the Removal Authorization section of the EP Job Aid Form (Attachment 4) and updating the EP Job Aid Index Log (Attachment 5).

3.6.8 The Director Emergency Preparedness shall ensure that the annual recertification review of open job aids is performed. Review includes the following:

- a. Assessment of open job aids for continued use.
- b. Verification that open job aids are current in content.
- c. Letter to file (with a copy of EP Job Aid Index Log) listing by number the Job Aids which were reviewed.

3.7 **Annual Training to Offsite Agencies**

3.7.1 On an annual basis, training should be offered to the following offsite agencies:

- New York State Emergency Management Office
- New York State Department of Health
- Oswego County Emergency Management

3.7.2 This training shall include:

- Review of NMP Site Emergency Plan or implementing procedures
- Classification of Emergencies/Emergency Action Levels
- Reporting Requirements
- Assessment and Protective/Corrective Actions
- Communication Networks

4.0 **DEFINITIONS**

None

5.0 **REFERENCES AND COMMITMENTS**

5.1 **Technical Specification**

5.1.1 Unit 1 Technical Specifications Sections 6.5.2.8

(CTS) 5.1.2 Unit 2 Technical Specifications Sections 6.5.2.8

5.2 **Licensee Documentation**

5.2.1 Nine Mile Point Site Emergency Plan

(ITS) 5.2.2 Nine Mile Point Unit 1 FSAR, Appendix B

5.3 **Standards, Regulations and Codes**

5.3.1 10 CFR 50.4

5.3.2 10 CFR 50.47

5.3.3 10 CFR 50.54t

5.3.4 10 CFR 50 Appendix E

5.3.5 FEMA-REP-15, Radiological Emergency Preparedness Exercise Evaluation Methodology

5.3.6 NUREG-0654/FEMA REP-1, Criteria for preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.

5.4 Policies, Programs and Procedures

- 5.4.1 NDD-EPP, Emergency Preparedness
- 5.4.2 NIP-EPP-01, Emergency Response Organization Expectations and Responsibility
- 5.4.3 NIP-RMG-01, Records Management
- 5.4.4 EPMP-EPP-02, Emergency Equipment Inventories and Checklists
- 5.4.5 EPMP-EPP-03, EDAMS Program Maintenance
- 5.4.6 EPMP-EPP-04, Emergency Exercise/Drill Procedure
- 5.4.7 EPMP-EPP-05, Emergency Preparedness Program Self Assessment
- 5.4.8 EPMP-EPP-06, Emergency Response Organizations Notification Maintenance and Surveillance
- 5.4.9 EPMP-EPP-08, Maintenance, Testing and Operation of the Oswego County Prompt Notification System

5.5 Commitments

| <u>Sequence Number</u> | <u>Commitment Number</u> | <u>Description</u> |
|------------------------|--------------------------|--|
| None | C1 | DER C-98-0625: Proceduralize emergency medical services program maintenance and oversight functions. |
| None | C2 | DER C-1999-0856: Periodic review and control of EP procedures misaligned with QATR/NDD-PRO/POL. |
| None | C3 | DER C-2000-1074: NRC Performance Indicators |
| | C4 | DER C-2000-0141: Conduct an off-hours unannounced ERO exercise requiring actual response to ERFs once every three years. |

6.0 RECORDS REVIEW AND DISPOSITION

6.1 The following records generated by this procedure shall be maintained by Records Management for the Permanent Plant file in accordance with NIP-RMG-01, Records Management.

- Drill, Exercise and Objectives Schedule
- Annual Emergency Preparedness Activities Schedule
- Annual Independent Emergency Preparedness Program Review
- Annual Emergency Plan Recertification Review Report
- 10 CFR 50.54(q) Effectiveness Review
- Any documentation generated as a result of Step 3.1.4 of this procedure

6.2 The following records generated by this procedure are not required for retention in the Permanent Plant File:

- Emergency Preparedness Job Aid Form
- EP Job Aid Index Log

LAST PAGE

ATTACHMENT 1: RECURRING EMERGENCY PREPAREDNESS ACTIVITIES

Recurring activities are individually numbered and coded as 'BW' for Bi-weekly, 'M' for monthly, 'Q' for quarterly, 'S' for semi-annual, 'A' for annual, 'B' for biennial, 'D' for following drills and/or exercise, 'AR' for As Required.

| A. | EP Program Items | Freq | Reference |
|-----|--|--------------|--|
| 1. | Develop and issue a drill report describing the scenario conducted and observations per EPMP-EPP-04 | D | EPMP-EPP-04 |
| 2. | Verify telephone numbers contained in emergency procedures and revise as necessary per EPMP-EPP-02. | Q | NUREG-0654, P.10 EPMP-EPP-02 |
| 3. | Ensure an independent review of the Emergency Preparedness Program is performed. | A | 10 CFR 50.54(t) NUREG-0654, P.9 |
| 4. | Ensure reviews of the Site Emergency Plan and Emergency Plan implementing procedure (listed in SEP Appendix C) in accordance with Step 3.4 of this procedure. | A | Tech Spec 6.5.2.8 EPMP-EPP-01 |
| 5. | Recertify the emergency plan in accordance with Step 3.3 of this procedure. | A | NUREG-0654, P.4 EPMP-EPP-01 |
| 6. | Ensure periodic reviews of Emergency Plan implementing procedures (listed in SEP Appendix C) are conducted in accordance with NIP-PRO-02 and NIP-PRO-03. | A | Site Emergency Plan |
| 7. | Review the Emergency Action Levels with the State and county governmental authorities and document per EPMP-EPP-01. | A | 10 CFR 50, Appendix E, Section IV, B EPMP-EPP-01 |
| 8. | Verify initial and annual requalification conducted for ERO personnel per NTP-TQS-202. | A | 10 CFR 50, Appendix E, Section IV, F NUREG-0654, O.5 NTP-TQS-202 |
| 9. | Perform a recertification review of the Emergency Preparedness Job Aids. | A | EPMP-EPP-01 |
| 10. | Perform a coordinated dissemination of information to the public within EPZ to include the following: a) "Emergency Planning and You" booklet b) Telephone advertisement c) Transient population poster d) Siren information sticker | A | 10 CFR 50, Appendix E, Section IV, D.2. NUREG-0654, G.1 |
| 11. | Verify performance of a familiarization of the media with the plans, radiation and points of contact for release of public information. | A | NUREG-0654, G.5 |
| 12. | Verify satisfactory completion of all required audits per EPMP-EPP-02. | M;Q and A | EPMP-EPP-02 |
| 13. | This step left intentionally blank. | | |
| 14. | Develop/maintain six year drill, exercise and objective schedule. | A | EPMP-EPP-01 |
| 15. | Develop an EP Activities Schedule. | A | EPMP-EPP-01 |

ATTACHMENT 1 (Cont)

| B. Periodic Tests of Facilities and Equipment | Freq | Reference |
|---|--------|---|
| 1. Verify the conduct of the bi-weekly silent test of the siren system. | M | NUREG-0654, Appendix 3, Section C.3.h.(1) EPMP-EPP-08 |
| 2. Conduct a test of the communications with the State and County agencies within the plume EPZ per EPMP-EPP-02. (RECS test) | M | 10 CFR 50, Appendix E Section IV.E.9.a NUREG-0654, N.2.a EPMP-EPP-02 |
| 3. Conduct a test of the communications from the CR, TSC, and EOF to the NRC (ENS and HPN) per EPMP-EPP-02. (ENS test) | M | 10 CFR 50, Appendix E, Section IV.E.9.d NUREG-0654, F.1.f EPMP-EPP-02 |
| 4. Conduct a test of the ERO pager system. | Weekly | NUREG-0654, F.3 EPMP-EPP-06 |
| 5. Conduct an inspection, inventory and operability test of all emergency equipment and instruments per EPMP-EPP-02. | AR | NUREG-0654, H.10 EPMP-EPP-02 |
| 6. Verify the conduct a growl test of the siren system (performance is also required whenever maintenance has been performed) per EPMP-EPP-08. | Q | NUREG-0654, Appendix 3, Section C.3.h.(1) EPMP-EPP-08 |
| 7. Verify the conduct of a test of the Unit 1 and Unit 2 ERDS surveillance. | Q | 10 CFR 50, Appendix E, Section VI.1. |
| 8. Conduct a test of the communications between the CR, TSC and EOF per EPMP-EPP-02. (Dedicated Telephone test) | A | 10 CFR 50, Appendix E Section IV.E.9.c. EPMP-EPP-02 |
| 9. Conduct a test of the communications with the State and County EOCs and the Field Monitoring Teams from the EOF per EPMP-EPP-02. (RECS and Radio/Radio Console test) | A | 10 CFR 50, Appendix E, Section IV.E.9.c. EPMP-EPP-02 |
| 10. Conduct a test of the communications with Federal EROs per EPMP-EPP-02. (ENS Test) | A | 10 CFR 50, Appendix E, Section IV.E.9.b. EPMP-EPP-02 |
| 11. Verify the conduct of an "all-blow" test of the siren system per EPMP-EPP-08. | A | NUREG-0654, Appendix 3, Section C.3.h.(1) EPMP-EPP-08 |
| 12. Verify collection/evaluations of emergency preparedness TLDs | Q | SEP 7.3.3.b.2 S-ENVSP-4.5 NUREG 0654 II.I. |

ATTACHMENT 1 (Cont)

C. Miscellaneous Activities/Tasks

| | | | |
|-----|--|----|----------------------------------|
| 1. | Perform CAN surveillance and testing: <ul style="list-style-type: none">• Perform CAN Test• Perform CAN Surveillance for Initial Responders• Send group rosters to responsible owners. | Q | EPMP-EPP-06 |
| 2. | Develop Performance Indicators | AR | EPMP-EPP-05 |
| 3. | Distribute prompt notification system monthly summary to New York State (including year-to-date siren availability) per EPMP-EPP-08 | M | EPMP-EPP-08 SEP section 6 |
| 4. | Distribute copy of annual QA/SRAB audit to State and County. | A | NUREG-0654, P.9 |
| 5. | Review all KI tablet supplies for expiration per EPMP-EPP-02. | A | SEP section 6 EPMP-EPP-02 |
| 6. | Verify completion of drill requirements via completion of required objectives, drills and reports. | A | EPMP-EPP-01 EPMP-EPP-04 |
| 7. | Update drill/exercise compliance matrix following each drill per EPMP-EPP-04 | D | EPMP-EPP-04 |
| 8. | Provide annual training for State and County | A | 10CFR50 Appendix E, Section F |
| 9. | Perform surveillance of Tone Alert Radio distribution | A | EPMP-EPP-08 |
| 10. | Verify completion of TSC Ventilation Test (S-IPM-TSC-001) | Q | NUREG 0696 |
| 11. | Perform self assessment activities in accordance with EPMP-EPP-05 | AR | EPMP-EPP-05 |
| 12. | Perform distribution of updates of SEP and EPIP to NRC | M | 10CFR 50.4 EPMP-EPP-01 |
| 13. | Perform EDAMS surveillance in accordance with EPMP-EPP-03 | A | EPMP-EPP-03 |
| 14. | Generate ERO Qualification List and: <ul style="list-style-type: none">• Generate list of delinquent personnel• Generate a list of personnel who will become delinquent before the next list is generated• Distribute the above to each emergency facility• Distribute the above to personnel in accordance with NIP-EPP-01 | Q | NIP-EPP-01 |

ATTACHMENT 1 (Cont)

C. Miscellaneous Activities/Tasks (Cont)

| | | | |
|-----|--|---|------------------------------------|
| 15. | Review PPF materials stored in temporary location for transfer to permanent location. | A | NIP-RMG-01 |
| 16. | Update Site and Emergency Telephone Directory | Q | None |
| 17. | Conduct surveillance of the content and frequency of training provided by Oswego County. | A | 10CFR50 Appendix E Section F |
| 18. | Verify conduct of New York State dial-up system surveillance. | Q | None |
| 19. | Schedule the following activities: <ul style="list-style-type: none"> • MS-1 training and drill dates for Oswego and University Hospitals • RP Familiarization and Plant Access training for offsite fire departments. • MS-1 training for Oswego Fire Department | A | 10CFR50 Appendix E Section F |
| 20. | Service copiers and fax machines in TSC, OSC and JNC | A | None |
| 21. | Solicit changes to the following documents: <ul style="list-style-type: none"> • New York State Public Health Law Article 30 and 30A • New York State CPR Title 10 Part 800 • New York State Basic Life Support protocols • Central NY Basic EMT protocols. IF needed, generate changes to NTP-TQS-402 and EPMP-EPP-02. | A | None Commitment C1 |
| 22. | Verify that all licensed SROs that may fulfill an SSS role AND whose drill participation requirement will expire within 6 months are scheduled to participate in an EP drill. | M | EPMP-EPP-05 Commitment C3 |
| 23. | Test or change all cordless headset batteries in TSC, OSC, EOF, JNC and Control Rooms. | A | None |
| 24. | 'Update EP Department on-call list and distribute to: <ul style="list-style-type: none"> • Control Rooms • Central Regional Control Center • Network Control Center • Oswego County Emergency Management • New York State Emergency Management | S | None |
| 25. | Conduct walkdown of emergency facilities using Attachment 6 | M | None |
| 26. | Assess ERO qualification status using Attachment 7 and the most recent ERO qualification report | M | None |

ATTACHMENT 2: PERIODIC REQUIREMENTS FOR DRILLS AND EXERCISES

Reoccurring drills and exercises are individually numbered and coded as 'M' for monthly, 'Q' for quarterly, 'S' for semi-annual, 'A' for annual, 'B' for biennial, and 'C' for once in a cycle (every 6 years). 'AR' for As Required.

| Periodic Drills and Exercises | Freq | Reference |
|--|---------------------------------|--|
| 1. Conduct a Health Physics (HP) drill involving response, monitoring, sampling and analysis activities. | S | NUREG-0654, N.2.e.(1) |
| 2. Conduct a communications drill with the State and County EOCs and the Field Monitoring Teams from the EOF. | A | NUREG-0654, N.2.a EPMP-EPP-02 |
| 3. Conduct a medical emergency drill involving a simulated contaminated individual which contains provisions for participation by local support services agencies. | A | NUREG-0654, N.2.c |
| 4. Conduct an environmental radiological monitoring drill involving onsite and offsite activities. | A | NUREG-0654, N.2.d |
| 5. Conduct a Health Physics drill involving the analysis of liquid samples using PASS. | A | NUREG-0654, N.2.e.(2) |
| 6. Conduct an exercise of the NMPNS Emergency Plan. Provide the opportunity for offsite authorities to participate in each exercise. | B | 10 CFR 50, Appendix E, Section IV, F.2 & F.3.(f) |
| 7. Conduct an exercise which involves a simulated release which would require a response by offsite authorities. Provide an opportunity for offsite authorities to fully participate in the exercise. At least partial participation is required of offsite authorities in every offsite exercise. | B | 10 CFR 50, Appendix E, Section IV, F.3 NUREG-0654, N.1.a |
| 8. Commence an exercise between 1800-0400. | C | NUREG-0654, N.1.b |
| 9. Conduct exercises in various weather conditions (during different seasons). | C | NUREG-0654, N.1.b |
| 10. Conduct an unannounced exercise (the knowledge of the exact date of the exercise is restricted to only non-players with a need to know). | AR | NUREG-0654, N.1.b FEMA GM, R1-TH-88-19 |
| 11. Conduct an Ingestion Pathway exercise. Provide the opportunity for the States to participate in the Ingestion Pathway exercise. | AR | 10 CFR 50, Appendix E Section IV, F.3.(e) |
| 12. Conduct an exercise which allows all State and local governments to fully participate together. | AR | 10 CFR 50, Appendix E Section IV, F.3.(c) |
| 13. Conduct an off hours, unannounced ERO exercise requiring actual response to Emergency Response Facilities | Once every three years | DER C-2000-0141 |

(C-4)

ATTACHMENT 3: 10CFR50.54(Q) EVALUATION AND EFFECTIVENESS REVIEW

Document Title: _____

Document Number: _____

Revision: _____

Preliminary Evaluation:

Does the proposed procedure/procedure change impact or alter:

- | <u>Yes</u> | <u>No</u> | <u>Item</u> |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | The assignment of responsibilities to either principal or supporting organizations or the ability to respond initially or on a continuous basis. |
| <input type="checkbox"/> | <input type="checkbox"/> | The staffing and/or responsibilities of on-shift personnel or initial activation and long term staffing of emergency response facilities. |
| <input type="checkbox"/> | <input type="checkbox"/> | The interface between onsite and offsite support response activities. |
| <input type="checkbox"/> | <input type="checkbox"/> | Arrangements for requesting and effectively using assistance or resources from offsite authorities or the accommodations for Federal, State, and/or Local staff at the Emergency Operations Facility. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Emergency Action Levels. |
| <input type="checkbox"/> | <input type="checkbox"/> | * The periodicity of communications and emergency equipment tests. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Notification process to the station Emergency Response Organization or the Local, State, or Federal entities. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Content of initial and follow-up messages. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Communications capability among principal response organizations to emergency personnel or the public. |
| <input type="checkbox"/> | <input type="checkbox"/> | Dissemination of coordinated information to the general or transient public including periodic information dissemination (brochures). |
| <input type="checkbox"/> | <input type="checkbox"/> | Emergency facilities and support equipment, used in emergency response, provisions, or maintenance. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Methods, systems and/or equipment for the assessment and monitoring of actual or potential offsite radiological consequences. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Protective Actions developed for either the Plume or Ingestion Exposure Pathways including onsite protective actions. |

* Indicates a "risk significant" planning standard.

ATTACHMENT 3 (Cont)

- ☐ ☐ Means for controlling emergency worker radiation exposures consistent with the guidelines established by the EPA.
- ☐ ☐ Arrangements for medical services for contaminated injured individuals.
- ☐ ☐ Plans for plant reentry and/or recovery organization operations.
- ☐ ☐ Periodicity of drills and/or exercises as well deficiency resolution.
- ☐ ☐ Training requirements for Emergency Response Organization or local site support personnel.
- ☐ ☐ Responsibilities for development, maintenance or review of the Plan as well as training requirements for personnel maintaining the Plan.
- ☐ ☐ Implementation of Federal regulations and requirements or Formal Emergency Preparedness commitments.

Assessment of Impact:

If any of the items of the preliminary evaluation are checked "Yes", then an effectiveness review analysis against the specific elements of 10 CFR 50.47(b), 10 CFR 50 Appendix E, other applicable regulations, requirements or commitments is required.

Documentation of the effectiveness review analysis and justification should be developed and attached to this form as follows:

Background and Scope Provides a description of the reason for and scope of the change.

Program Requirements A description of the regulation or commitment criteria, related to each change, for which the Emergency Preparedness Program must demonstrate compliance. This includes nonregulated elements described by the currently effective Emergency Plan.

Change Assessment A discussion of how each change degrades, does not affect or enhances the effectiveness and abilities of the Emergency Preparedness Program as it relates to the program requirements.

Justification A formal justification which describes reason the change is appropriate and necessary.

Change Matrix If practical, a comparison table showing both old and new wording, including step or section number references is developed. Changes which involve the incorporation of previously unaddressed elements shall mark the old wording as 'Not Applicable'. Changes with involve the deletion of an element shall mark the new wording as 'Removed from Document'.

ATTACHMENT 3 (Cont)

References Provides a list of references described in the analysis such as regulation numbers, guidance documents, information notices, inspection reports or other sources which contain criteria incorporated by the Emergency Plan.

Conclusion State the conclusion (decrease/no decrease in effectiveness) of the analysis.

Statement of Conclusion:

Does the change maintain the equivalent or establish an improved capability:

| <u>Yes</u> | <u>No</u> | <u>N/A</u> |
|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

To respond to an emergency or meet actions or other requirements described in the Emergency Plan.

| | | |
|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|

In protecting the health and safety of plant personnel and the general public in the event of an emergency.

| | | |
|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|

In implementation of a Federal regulation or requirement or formal commitment.

Based on this evaluation the proposed change (Circle One) **DOES / DOES NOT** decrease the effectiveness of the Emergency Plan.

The Plan, as changed, (Circle One) **CONTINUES / DOES NOT CONTINUE** to meet the standards of 10 CFR 50.47(b), the requirements 10 CFR 50 Appendix E, and all other applicable regulations, requirements, and commitments.

Disposition:

Application shall be made and approval obtained from the NRC for proposed changes that decrease the effectiveness of the Plan prior to implementation.

Evaluator (print/initial): _____

Date

Concurrence - EP (print/initial): _____

Date

ATTACHMENT 4: EMERGENCY PREPAREDNESS JOB AID FORM

(To be assigned by EP) Job Aid Number: _____

Originating Information

| | | | |
|--|---------|--------------|-------|
| Name(Print): | | Branch/Dept: | Date: |
| Last, First | Initial | | |
| TEL. EXT# _____ | | Pager# _____ | |
| Intended Use and Justification: (Attach sample Job Aid) | | | |
| PCE # _____ If procedure change required. Attach a copy. | | | |
| Reference Source Document including Revision Number: | | | |
| Affected Position(s): | | | |
| Method and Location of Posting: | | | |

Approval Authorization

| | | |
|------------|--------------------------|-------|
| Signature: | Expiry Date if assigned. | Date: |
| | | |

Removal Authorization

| | |
|------------|-------|
| Signature: | Date: |
| | |

ATTACHMENT 5: EP JOB AID INDEX LOG

| Number | Originator Name/Branch | Description of Posted Operator Aid | Date Posted | Expiration Date (If assigned) | Date Removed |
|--------|---------------------------|------------------------------------|----------------|----------------------------------|-----------------|
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ATTACHMENT 6: MONTHLY FACILITY INSPECTION CHECKLIST

Month _____ Year _____ EOF JNC OSC TSC

- | | |
|--|---|
| <input type="checkbox"/> Facility cleanliness | <input type="checkbox"/> Hand/foot monitors (TSC) |
| <input type="checkbox"/> General maintenance (lights, furniture, phones) | <input type="checkbox"/> Procedures |
| <input type="checkbox"/> Wall and or radio console clocks | <input type="checkbox"/> EOPs (TSC/EOF) |
| <input type="checkbox"/> Keys/break-away box | <input type="checkbox"/> PING (TSC) |
| <input type="checkbox"/> Emergency ventilation (TSC) | <input type="checkbox"/> Portable Instrumentation (OSC/EOF) |
| <input type="checkbox"/> Storage areas | <input type="checkbox"/> Computers |
| <input type="checkbox"/> Conference areas | <input type="checkbox"/> Previous month's deficiencies reviewed/corrected |

| Corrective Actions | Assigned to | Date Completed |
|--------------------|-------------|----------------|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

Comments _____

Completed by: _____ Date: _____

ATTACHMENT 7: ERO QUALIFICATION LIST SURVEILLANCE

Month: _____

Completed by: _____

Instructions: Using the most recently issued "ERO Training due Report and Qualification List", assess the following:

- ☐ 1. Verify that no personnel will expire due to lapsed "Drill Participation" requirements prior to the next drill
 - ☐ a. If a person will expire before the next drill, then write a DER and find a qualified replacement in anticipation of the loss
 - ☐ b. If a person must participate in the next drill in order to remain qualified, verify that persons planned participation by whatever means
- ☐ 2. Verify that all rosterized ERO positions have at least four qualified persons. If vacancies exist, verify that personnel are in the process of being qualified to accommodate the vacancies.
- ☐ 3. Verify that all non-rosterized ERO positions have sufficient numbers of qualified responders (use a ration of 5 qualified people for each required responder). If vacancies exist, verify that personnel are in the process of being qualified to accommodate the vacancies.
- ☐ 4. Verify that all non-qualified (lapsed qualification) responders are flagged as such and that DER's have been written.
- ☐ 5. Validate all responders in the report against the current CAN list and revise CAN or ERO database as required.

Detail actions taken for all unsat items:
