



# FOR INFORMATION ONLY

# AmerGen

TMI Emergency Plan  
Implementing Document

Number

**EPIP-TMI-02**

Revision No.

**19**

## Emergency Direction

Applicability/Scope

**USAGE LEVEL**

Effective Date

TMI Division

**2**

**11/09/01**

This document is within QA plan scope  
50.59 Applicable

<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No

### List of Effective Pages

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1.0 **PURPOSE**

This procedure provides guidance for the Emergency Director, Emergency Director Assistant and Operations Coordinator. The guidance is to ensure that resources are mobilized to mitigate the consequences of an accident. The procedure verifies actions are initiated to protect the health and safety of the public following determination that an EAL has been exceeded which warrants an emergency declaration.

2.0 **APPLICABILITY/SCOPE**

This procedure applies to all Emergency Plan Implementations at TMI.

3.0 **DEFINITIONS**

- a. Refer to EPIP-TMI-.01, Emergency Classification, Section 3.0
- b. Optional - This implies "as necessary" or "if required" for a stated action.

4.0 **RESPONSIBILITIES**

- a. The Emergency Director is responsible for the implementation of this procedure.
- b. The Emergency Director is vested with certain authority and responsibility that may not be delegated. Included are:

**NOTE**

The following items are numbered for reference only, performance in sequence is not required or expected.

- 1. Approving and directing official notifications to offsite agencies.
- 2. Approving information releases to the media.

**NOTE**

ED/ESD approval is not required for public announcement of formal emergency declarations and changes of emergency classifications.

- 3. Approving Protective Action Recommendation
  - 3.1 If possible, personally conveying appropriate Protective Action Recommendations to the Senior Official at the State EOC.

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4. Brief the NRC Site Team Leader
  - 4.1 Serve as the point of official contact for TMI for receiving NRC directives.

**NOTE**

NRC will interface with other TMI Emergency Response personnel in mitigating the consequences of the emergency.

5. Classification of an emergency event.
6. Directing onsite evacuation at the Alert or lower level emergency classification based on potential hazard to non-essential personnel.
7. Authorizing emergency workers to exceed 10CFR20 Radiation Exposure Limits.

**NOTE**

This is in accordance with EPA-400 Guidance.

8. Approving and directing deviation from established operating procedures, emergency operating procedures, normal equipment operating limits, EPIP's, Safeguards Measures, License Conditions or technical specifications during attempts to control the plant during an emergency or a declared National Security Emergency.

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**NOTE 1**

For National Security Emergencies, the following conditions must be met:

- a) When this action is immediately needed to implement National Security Objectives as designated by the National Command Authority through the NRC, and
- b) No action consistent with licensee conditions and technical specifications that can meet National Security Objectives is immediately apparent.

**NOTE 2**

In essence, no one below a licensed SRO individual can make the decision to depart from the License in accordance with 10 CFR 50.54 (X) and (Y). Invoking this option requires that the deviation is documented and the NRC is notified in accordance with 10 CFR 50.72. However, if a more senior manager is present (i.e., Emergency Director) even though he does not possess an SRO License the decision authority would be passed to him as a higher authority in the chain of command. The licensed SRO shall provide his best judgment to the ED for his consideration. Beyond that the SRO shall follow the orders of his supervisor.

It is imperative that the Emergency Director consult to the fullest extent practicable with the SRO and the technical staff in arriving at a decision to deviate from prescribed procedures. However, Emergency Operating Procedures should not generally be deviated from. If the decision is made to depart from license conditions, safeguards measures or Technical Specifications, notify the NRC before taking such action, if time permits and if not then within one hour.

- c. When the designated Emergency Support Director (ESD) arrives at the EOF and declares himself to be ready to assume that role, he will assume overall responsibility for management of the response to the accident and recovery operations.
  - With activation of the ESD function, the ESD specifically will assume decision authority for Items 2., 3., 3.1, 4. and 4.1 and may assume Item 1. if requested by the Emergency Director (ED). However, decision authority for Items 5., 6., 7., and 8. will be retained by the Emergency Director (ED).
  - Decisions on all of the listed actions normally will result from close and continuous consultation between the ESD and the ED and it is the responsibility of the ED to ensure the ESD is provided with the necessary information to arrive at timely and appropriate decisions.
  - In the special case of event classification, the ESD shall retain the prerogative to overrule the ED if, in the judgement of the ESD, uncertainty or other considerations exist to the extent warranting classification of a higher level of emergency than that classified by the ED.

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- The ESD can also overrule the ED to direct a site evacuation at the alert or lower level emergency, if he deems it prudent.
- d. The ED (Vice President TMI-Unit 1 or designee, ESD, Chief Nuclear Officer TMI Unit 1) is responsible for authorizing personnel to work in the plant (ECC, OSC, TSC) during an emergency if they are not Fit For Duty (i.e.,  $\geq 0.04\%$  BAC).

5.0 **PROCEDURE**

5.1 Following the determination that a condition in EPIP-TMI-.01, Emergency Classification, has been reached or exceeded warranting declaration of an emergency, the Shift Manager/Emergency Director shall ensure that Exhibit 1, Emergency Director's Checklist is adhered to throughout the course of the emergency.

- a. Exhibit 4, ED/ESD Turnover Checklist, is to be used to enhance the transition from On-Shift to Initial Response ED duties.
  - Exhibit 4, ED/ESD Turnover Checklist is to be used by the ED to turnover duties to the ESD.
- b. Exhibit 5, ED Briefing Sheet, SHALL be used to conduct periodic briefings.
- c. Exhibit 8, Protective Action Recommendation Logic Diagram, SHALL be used as guidance for development of a protective action recommendation.
  - Review of the Logic Diagram SHALL start at the declaration of a Site Area Emergency.

5.2 The Operations Coordinator will assist the Emergency Director in accident mitigation.

- a. The Operations Coordinator will follow, as appropriate, Exhibit 9, Operations Coordinator Checklist.

5.3 The Emergency Director Assistant will assist the Emergency Director in accident mitigation.

- a. The Emergency Director Assistant will follow, as appropriate, Exhibit 10, Emergency Director Assistant Checklist.

6.0 **REFERENCES**

- a. TMI Nuclear Emergency Plan (AP 1092)
- b. TMI Emergency Plan Implementing Documents

7.0 **EXHIBITS**

- 7.1 Exhibit 1, Emergency Director's Checklist
- 7.2 Exhibit 2, Emergency Report Form - TMI
- 7.3 Exhibit 3, EAL Descriptions

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- 7.4 Exhibit 4, ED/ESD Turnover Checklist
- 7.5 Exhibit 5, Emergency Director Briefing Sheet
- 7.6 Exhibit 6, ECC Accountability
- 7.7 Exhibit 7, Emergency Director Authorization Form for Deviations From Requirements
- 7.8 Exhibit 8, Protective Action Recommendation Logic Diagram
  - 7.8.1 Exhibit 8A, PAR Notification Form Initial PAR
  - 7.8.2 Exhibit 8B, PAR Notification Form Expansion of PAR
- 7.9 Exhibit 9, Operations Coordinator Checklist
- 7.10 Exhibit 10, Emergency Director Assistant Checklist
- 7.11 Exhibit 11, Site Evacuation Message
- 7.12 Exhibit 12, PI REP-ECC Checklist
- 7.13 Exhibit 13, Press Release Guidance
- 7.14 Exhibit 14, Site Access Policy for Media during Emergencies
- 7.15 Exhibit 15, TMI/NRC Emergency Response Interface Criteria

1.0 Emergency Conditions

This is \_\_\_\_\_  
Name

I have declared an **UNUSUAL EVENT** per

\_\_\_\_\_ EAL#, Title and a Brief description  
at \_\_\_\_\_ hours and I have assumed the role of  
Emergency Director.

This is \_\_\_\_\_  
Name

I have declared an **ALERT** per

\_\_\_\_\_ EAL#, Title and a Brief description  
at \_\_\_\_\_ hours and I have assumed the role of  
Emergency Director.

This is \_\_\_\_\_  
Name

I have declared a **SITE AREA EMERGENCY**  
per \_\_\_\_\_

\_\_\_\_\_ EAL#, Title and a Brief description  
at \_\_\_\_\_ hours and I have assumed the role of  
Emergency Director.

This is \_\_\_\_\_  
Name

I have declared an **GENERAL EMERGENCY** per

\_\_\_\_\_ EAL#, Title and a Brief description  
at \_\_\_\_\_ hours and I have assumed the role of  
Emergency Director.

UNUSUAL  
EVENT

ALERT

SITE AREA  
EMERGENCY

GENERAL  
EMERGENCY

1.1 Immediately complete Part 1 of an Emergency Report Form (ERF) using EP Notification for Lotus Notes.

If Lotus Notes is not available THEN use a 4-part form as follows:

- Use Exhibit 3 for EAL Number and Title in the Event Description area of the form
- Include plant status (e.g., Power Operations, Hot Shutdown, etc.)
- Modify Level 3 to a Level 4, and inform Communicator of change, if applicable.

**NOTE:**

Consider activating the Emergency Support Organization, Call Out Level 3, if an **ALERT** is declared. Staff the Emergency Support Organization, on Duty section, for an Unusual Event or Alert based on a Security Event, Call Out Level 4.

**Routine / Non-Routine Release Determination**

Any planned (approved release permit) release or a release as a result of planned operations is a **No non-routine radioactive release in progress** selection on the Emergency Report Form. Examples of planned operations: Normal SG tube leakage, minor leak/spill during repair operations. [This is NOT an all-inclusive list!]

A **Non-routine radioactive release in progress** is any release that is not pre-approved or is not part of normal power operations additionally there is flow through the boundary and activity greater than that expected for normal operations is being released. Some Judgement does apply. Examples: Steam driven Emergency Feed pump, Condenser offgas with the low range monitors in alarm or a planned release that can not be secured (automatically or manually). [This is NOT an all-inclusive list!]

1.1.1 Direct the ECC Communications Coordinator to perform the following:

- Initiate CALL OUT and NOTIFICATION using Page 1 of the Emergency Report Form
- Initiate CONTACT via an ECC Communicator using Page 2 of the Emergency Report Form.

1.1.2 Consult BRIEFLY with the RAC and SECURITY (if applicable) for limitations on Mustering and Evacuation of non-essential personnel, before completing the ERF.

- Direct that Page 4 of the ERF is read over the PLANT PAGE SYSTEM and RADIO to alert on-site personnel of the emergency

**NOTE**

- Off-site agency NOTIFICATION **SHOULD** be started within 5 minutes of event declaration and **SHALL** be made within 15 minutes of event declaration.
- INITIAL** completion of steps or mark N/A in accordance with the applicable level of emergency.
- Plant Page announcements and CONTACT **SHOULD** be performed in parallel or immediately following off-site notifications.
- The off-site notification process may be assigned TEMPORARILY to a qualified communicator that is not a CRO, when the CRO's attention is required for plant operations.
  - Such reassignment **SHOULD** only occur under the most extreme conditions for initial plant stabilization and **ONLY** if a qualified alternative is already present in the Control Room
  - The CRO-ECC Communications Coordinator is expected to be available to continue with notifications within 30 minutes of event declaration and **SHALL** be the individual performing the notification to the NRC on the ENS line, unless relieved by the IREO communicator.

	UNUSUAL EVENT	ALERT	SITE AREA EMERGENCY	GENERAL EMERGENCY
1.2 Evaluate dose projections and/or plant conditions and develop a PAR in accordance with Exhibit 8, Protective Action Recommendation Logic Diagram.	N/A	N/A		
1.2.1 If the EOF is <b>NOT</b> activated, personally provide the PAR to the SENIOR person at the STATE EOC by using Exhibit 8A or 8B.	N/A	N/A	N/A	

**NOTE**

1. The following steps are provided in an order likely to result in the most efficient response. However, due to the dynamic and unpredictable nature of emergencies there may be conditions where procedural limitations are evident. These conditions may justify performance of steps "**Out-of-Sequence**" from that specified in this procedure. This is allowed provided that a review of all intermediate steps confirms that this will not adversely impact the outcome of this procedure.
2. If the emergency level escalates or de-escalates, **STOP** and proceed with Step 1 for the new Emergency Level.

a. Direct the Security Supervisor/Coordinator (Ext. 8039) to reset the accountability system (Optional at Unusual Event, required for Alert or greater declarations). This is a ONE TIME ONLY action. Once performed it is NOT repeated.	Optional			
b. Contact the duty Emergency Director to discuss:				
<ul style="list-style-type: none"> <li>• Plant Status</li> <li>• Which members of the duty section are required to augment the emergency organization.</li> </ul>				

EX . 1

	UNUSUAL EVENT	ALERT	SITE AREA EMERGENCY	GENERAL EMERGENCY
<p>c. Implement EPIP-TMI-.05, Communications and Record Keeping</p> <ul style="list-style-type: none"> <li>• Communications equipment operation information</li> <li>• Communications documentation including the basis for judgements and assumptions as well as event timing.</li> <li>• Implementation/Maintenance of logs               <ul style="list-style-type: none"> <li>i. Ensure applicable Operations Procedures are being implemented.</li> <li>ii. For SECURITY Events contact the Security Coordinator (Site Protection Shift Supervisor)</li> </ul> </li> <li>• Ensure Security Procedures are being implemented.</li> <li>• Discuss the specifics of the situation (i.e., Accountability/Muster, Emergency personnel response, radio communications, Design Basis Security Event, etc.)</li> </ul>	_____	_____	_____	_____
<p>d. If deviation from requirements such as procedures (beyond the flexibility provided by AP 1001G), Tech Specs, and others per ED responsibilities (4.2.8) are needed, perform the following as necessary:</p> <ul style="list-style-type: none"> <li>• Consult management/Technical Staff if time permits.</li> <li>• Consider alternatives prior to deviation.</li> <li>• Log deviation and provide reason by using Exhibit 7.</li> <li>• Notify NRC before taking actions, if time permits. If not, notify the NRC within 1 hour after the deviation.               <ul style="list-style-type: none"> <li>a. Notification of the NRC is documented by using Exhibit 7, except for the condition in Step b, below.</li> </ul> </li> </ul>	_____	_____	_____	_____
<p>b. If a Design Basis Security threat occurs, notify the NRC that deviations from the Security Plan commitments are being made in accordance with the TMI Contingency Plan. Complete Exhibit 7 as time permits.</p>				

NRC Notified \_\_\_\_\_  
Name \_\_\_\_\_ Time \_\_\_\_\_ Date \_\_\_\_\_

	UNUSUAL EVENT	ALERT	SITE AREA EMERGENCY	GENERAL EMERGENCY
e. Depending on the nature of the event (Security, Fire, Chemical Hazards, or Environmental incidents) evaluate dispatching a qualified Emergency Duty Roster person to the scene for local emergency control.	_____	_____	_____	_____
f. Direct that any ongoing normal liquid (e.g., WECST) or gaseous (e.g., WDG or RB purge) effluent releases that are in progress be stopped, until an assessment of their impact is performed.	_____	_____	_____	_____
g. If local emergency services such as fire, ambulance, or police are required:				
<ul style="list-style-type: none"> <li>• Direct the ECC Communications Coordinator to notify Dauphin County Emergency Operations Center and request the appropriate assistance.</li> </ul>	_____	_____	_____	_____
<ul style="list-style-type: none"> <li>• Notify Security to begin preparations to expedite entry of responding emergency personnel.</li> </ul>	_____	_____	_____	_____
<ul style="list-style-type: none"> <li> <ul style="list-style-type: none"> <li>i. Identify the gate(s) to be used.</li> <li>ii. Identify the expected response such as fire, ambulance or police.</li> <li>iii. Advise Security to implement EPIP-TM-.19, <u>Emergency Security / Dosimetry Badge Issuance.</u></li> </ul> </li> </ul>				
<ul style="list-style-type: none"> <li>• Implement EPIP-TMI-.16, <u>Contaminated Injuries</u>, as necessary</li> </ul>	_____	_____	_____	_____



UNUSUAL EVENT	ALERT	SITE AREA EMERGENCY	GENERAL EMERGENCY
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d. Periodically (**HOURLY OR AS CONDITIONS CHANGE**) consult with the lead personnel:

- Obtain a completed Exhibit 5, Emergency Director Briefing Sheet from the Operations Coordinator
- Use the ED intercom. About 30 seconds before a briefing, press the "ALERT TONE" button, release and announce "Standby for an ED briefing."

**Place a checkmark each time this step is completed**

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<p><b>NOTE</b></p> <p>1. IF the backup OSC is achieved THEN direct the OSC Coordinator to come to the ECC for the briefing.</p> <p>2. The ED intercom DOES NOT include the EOF in the briefing; alternate communications are required, such as; ED/ESD hotline, speakerphone (dial 948-8966).</p>
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- Conduct the periodic briefing

**Record the time each briefing is conducted.**

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Ex . 1

UNUSUAL  
EVENT

ALERT

SITE AREA  
EMERGENCY

GENERAL  
EMERGENCY

1.4 Press release approval refer to Exhibit 13, Press Release Guidance.

**NOTE**

1. During the initial stages of an emergency, the Public Information Duty representative will call to obtain information to create a press release. **DO NOT DELAY ANSWERING THIS CALL.**
2. The Public Information Duty representative MAY request verbal approval (i.e., via telephone) of a press release. Ensure you are completely satisfied with the content before granting verbal approval.

1.4.1 Reviews are coordinated by the ED Assistant.

- Technical
- Radiological
- Security

(SAFEGUARDS Security Events Only!)

Record the time each news release is approved.

a. If a site evacuation is anticipated, direct the ED Assistant to implement EPIP-TMI-.36, Emergency Assembly and Site Evacuation, in preparation for the evacuation.

- Direct an evacuation of non-essential personnel by private vehicle to a Remote Assembly Area (RAA) (Training Center or EOF) through the ED Assistant
- If a General Emergency was declared without escalating through a Site Area Emergency, request the Security Coord. perform a "sweep" outside the Protected Area, to ensure notification of all site personnel, in accordance with EPIP-TMI-.36, Exhibit 7.

b. Refer to Exhibit 15 for TMI/NRC Emergency Response Interface Criteria.

- Request all NRC directives in writing.
- Use of Exhibit 4, ED/ESD Turnover Checklist as well as Exhibit 5, Emergency Director Briefing Sheet, will be useful for any NRC briefings.

c. If media access to the site is required, refer to Exhibit 14, "Site Access Policy for Media during Emergencies".

	Optional	Optional	Optional	N/A
	Optional	Optional		
	N/A	N/A	N/A	

	UNUSUAL EVENT	ALERT	SITE AREA EMERGENCY	GENERAL EMERGENCY
1.5 Evaluate plant conditions in accordance with 1044, <u>Event Review and Reporting Requirements</u> and LS-AA-125, <u>Corrective Action Program (CAP) Procedure</u> , to ensure that reporting requirements are met.	_____	_____	_____	_____
1.6 Based upon assessment of plant condition, either close out the current emergency classification, escalate to a higher emergency classification or downgrade to a lower classification as follows:	_____	_____	_____	_____

**NOTE**

Information Notifications are made as a minimum for the following conditions:

- a. A change in plant status without a change in level of declared emergency.
- b. When an extended period of time has transpired (e.g., 2-3 hours) without any change in plant status. The purpose of this notification is to inform the off-site agencies of the status of the event.

1.6.1 Conditions exceed the emergency action levels for the current emergency classification (Refer to EPIP-TMI-.01, <u>Emergency Classification</u> ), escalate to a higher classification. Go to the beginning of this checklist.	_____	_____	_____	_____
1.6.1.1 If the EOF is activated discuss the basis with the ESD prior to escalation to a General Emergency	N/A	N/A	_____	_____

**NOTE**

**Do not de-escalate from a General Emergency.**

1.6.2 Refer to EPIP-TMI-.45, <u>Classified Emergency Termination/Recovery</u> , and EPIP-TMI-.01, <u>Emergency Classification</u> , to determine if the listed criteria has been met to enter recovery, de-escalate or terminate the event for current conditions. However, the actions implemented by off-site agencies should be considered before such action is taken.	_____	_____	_____	_____
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**EXHIBIT 1**

2.0 FINAL CONDITIONS

2.1 Emergency Status

a. The current emergency has been closed out since no long term recovery operations are required.

OR

b. The current emergency has been shifted to the recovery mode, implementing EPIP-TMI-.45, Classified Emergency Termination/Recovery.

2.2 At the close of the emergency, ensure that all logs, checklists, procedures and other documentation generated in the Control Room associated with the event are gathered and sent to the Emergency Preparedness Group for review and filing.

2.3 An inventory of the ECC is required to be performed by the end of the working day following the end of the event. The inventory is the responsibility of Plant Operations Director. Notify the Plant Operations Director of the need to perform the inventory in accordance with procedure, TEP-ADM-1300.01, Maintaining Emergency Preparedness.

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Signature

/ Date

EXHIBIT 2

<b>AmerGen</b> <small>An Exxon/British Energy Company</small>	<b>EMERGENCY REPORT FORM - TMI</b> <i>(Press Firmly and Write Clearly)</i>	Part 1 of 4 <b>Call Out/Notification</b>
<b>CALL OUT</b>		
(Select one) <input type="checkbox"/> <b>LEVEL 1 Onshift</b> (Required for Unusual Event) <input type="checkbox"/> <b>LEVEL 2 Initial Response Emergency Organization &amp; Onshift</b> (Required for Alert) <input type="checkbox"/> <b>LEVEL 3 Emergency Support Organization &amp; Initial Response Emergency Organization &amp; Onshift</b> (Required for SAE & GE)		
Start Here for Notifications Read message - slowly - clearly.		
SAMPLE		
(Select) <input type="checkbox"/> This is a drill. This is a drill. <input type="checkbox"/> This is <b>NOT</b> a drill. This is <b>NOT</b> a drill.		
Completed by Communicator This is _____ at TMI, my phone number is (Select) 944 _____ <small>Name</small> <span style="margin-left: 150px;"><small>Extension</small></span> 948 _____		
<b>EMERGENCY CLASSIFICATION</b>		
(Select One) <input type="checkbox"/> An Unusual Event has been declared <input type="checkbox"/> A Site Area Emergency has been declared <input type="checkbox"/> An Alert has been declared <input type="checkbox"/> A General Emergency has been declared <input type="checkbox"/> The event has been terminated		
at _____ hours on _____ <i>Emergency Classification Time (24 hour clock)</i> <i>Emergency Classification Date</i>		
(Select) This represents: <input type="checkbox"/> An Initial Classification Status <input type="checkbox"/> An escalation in Classification Status <input type="checkbox"/> No change in Classification Status <input type="checkbox"/> A reduction in Classification Status		
<b>EVENT DESCRIPTION</b>		
(Enter EAL number, EAL title and plant status)		
There is: <input type="checkbox"/> No <input type="checkbox"/> An airborne <input type="checkbox"/> A liquid non-routine radiological release in progress.		
<b>MUSTER/EVACUATION</b>		
<b>ONLY if the initial event classification is a GENERAL EMERGENCY</b> then TRANSMIT the Protective Action Recommendation (PAR) to the risk counties <b>PROTECTIVE ACTION RECOMMENDATION</b>		
(Select One) <input type="checkbox"/> EVACUATE the 5 mile radius around the plant and SHELTER the 5 to 10 mile radius around the plant <input type="checkbox"/> SHELTER the 10 mile radius around the plant (Use SHELTER ONLY option when it is clear that EVACUATION is NOT appropriate)		
<b>METEOROLOGICAL CONDITIONS</b>		
Wind direction is from _____ and the wind speed is _____ miles per hour.		
(Select) <input type="checkbox"/> This is a drill. This is a drill. <input type="checkbox"/> This is <b>NOT</b> a drill. This is <b>NOT</b> a drill.		
Approved - ED/ESD _____		



<b>AmerGen.</b> <small>An Exelon/British Energy Company</small>	<b>EMERGENCY REPORT FORM - TMI</b>	Part 2 of 4 Contact
<b>CALL OUT</b>		
(Info only) <input type="checkbox"/> LEVEL 1 Onshift <input type="checkbox"/> LEVEL 2 Initial Response Emergency Organization & Onshift <input type="checkbox"/> LEVEL 3 Emergency Support Organization & Initial Response Emergency Organization & Onshift		
Start Here for Contact Read Message - slowly - clearly.		
SAMPLE		
<input type="checkbox"/> This is a drill. This is a drill. <span style="margin-left: 200px;"><input type="checkbox"/> This is NOT a drill. This is NOT a drill.</span>		
<b>EMERGENCY CLASSIFICATION</b>		
<input type="checkbox"/> An Unusual Event has been declared <input type="checkbox"/> An Alert has been declared <input type="checkbox"/> The event has been terminated		
<input type="checkbox"/> A Site Area Emergency has been declared <input type="checkbox"/> A General Emergency has been declared		
at _____ hours on _____ <i>Emergency Classification Time</i> <span style="float: right;"><i>Emergency Classification Date</i></span>		
This represents: <input type="checkbox"/> An initial Classification Status <input type="checkbox"/> No change in Classification Status		
<input type="checkbox"/> An escalation in Classification Status <input type="checkbox"/> A reduction in Classification Status		
<b>EVENT DESCRIPTION</b>		
There is: <input type="checkbox"/> No <input type="checkbox"/> An airborne <input type="checkbox"/> A liquid non-routine radiological release in progress.		
<input type="checkbox"/> This is a drill. This is a drill. <span style="margin-left: 200px;"><input type="checkbox"/> This is NOT a drill. This is NOT a drill.</span>		
Approved - ED/ESD		





EXHIBIT 2

<b>AmerGen</b> <small>An Exelon/Bechtel Energy Company</small>	<b>EMERGENCY REPORT FORM - TMI</b>	Part 4 of 4 Plant Page
<b>CALL OUT</b>		
(Info only) <input type="checkbox"/> LEVEL 1 Onshift <input type="checkbox"/> LEVEL 2 Initial Response Emergency Organization & Onshift <input type="checkbox"/> LEVEL 3 Emergency Support Organization & Initial Response Emergency Organization & Onshift		
Turn on whelen speakers. Read message - slowly - clearly. Attention all personnel. Attention all personnel.		
<b>SAMPLE</b>		
<input type="checkbox"/> This is a drill. This is a drill. <span style="margin-left: 200px;"><input type="checkbox"/> This is NOT a drill. This is NOT a drill.</span>		
<b>EMERGENCY CLASSIFICATION</b>		
<input type="checkbox"/> An Unusual Event has been declared <input type="checkbox"/> An Alert has been declared <input type="checkbox"/> The event has been terminated		
<input type="checkbox"/> A Site Area Emergency has been declared <input type="checkbox"/> A General Emergency has been declared		
at _____ hours on _____ <i>Emergency Classification Time</i> <span style="margin-left: 150px;"><i>Emergency Classification Date</i></span>		
<b>EVENT DESCRIPTION</b>		
All members of the following organization(s) (Refer to Call Out Above). Report to your stations.		
<b>MUSTER/EVACUATION</b>		
<i>All non-essential personnel</i>		
<input type="checkbox"/> Remain at your stations and await further instructions. <input type="checkbox"/> In radiologically controlled areas, report to the Rad-Con access point, and those outside radiologically controlled areas		
REPORT TO:		
<input type="checkbox"/> Your supervisor and await further instructions <input type="checkbox"/> Warehouse 1 <input type="checkbox"/> Warehouse 3 via _____		
<input type="checkbox"/> Training Center <input type="checkbox"/> EOF via _____		
using the <input type="checkbox"/> North Bridge <input type="checkbox"/> South Bridge <input type="checkbox"/> North and South Bridges <i>Assemble with your supervisor and await further instructions.</i>		
<b>RADIOLOGICAL INSTRUCTIONS</b>		
<input type="checkbox"/> Sound station emergency alarm <input type="checkbox"/> This is a drill. This is a drill.		
<input type="checkbox"/> This is NOT a drill. This is NOT a drill.		
Repeat message. Turn off whelen speakers.		
Approved - ED		



Distribution: Green - Call Out/Notification; Yellow - Contact; White - ED copy; Pink - Plant Page

AG0130 (8/01)

## EXHIBIT 3

EAL	BRIEF TITLE	EVENT DESCRIPTION
U1.1	<b>Radiological Effluent Limits Are Being Exceeded</b>	<i>An Unusual event is declared because an abnormal release of radiation from the power plant has or will exceed 60 minutes and could lead to very low level radiation dose rates at or beyond the outer boundary of the plant site.</i>
U1.2	<b>Unexpected Radiation Readings Inside the Power Plant</b>	<i>An Unusual Event is declared because of abnormally high radiation levels measured inside the power plant that indicates a degradation in the control of radioactive material. No abnormal releases to the environment are occurring.</i>
U1.3	<b>Liquid Radioactive Release That Exceeds Limits</b>	<i>An Unusual Event is declared because a release of radioactive liquid that exceeds the limits of government regulations has lasted for 60 minutes or more. This event indicates a degradation in the ability to control the release of radioactive materials to the river.</i>
U1.4	<b>Low Spent Fuel Pool Level</b>	<i>An Unusual Event is declared because of the uncontrolled leakage of water from the Spent Fuel Pool. The leakage exceeds or is expected to exceed the ability to refill the pool. No abnormal releases of radioactivity to the environment are occurring.</i>
U1.5	<b>Low Fuel Transfer Canal Level</b>	<i>An Unusual Event is declared because of the uncontrolled leakage of water from the Fuel Transfer Canal. The leakage exceeds or is expected to exceed the ability to refill the canal. No abnormal releases of radioactivity to the environment are occurring.</i>
U1.6	<b>Fuel Clad Damage With Increased Radiation</b>	<i>An Unusual Event is declared because of indications that there has been damage to the metal tubes that hold the nuclear fuel pellets. Increased radiation has been detected in the water that flows through the nuclear reactor. No abnormal releases of radioactivity to the environment are occurring.</i>
U2.1	<b>Potential Loss or Loss of Containment</b>	<i>An Unusual Event is declared because of the: Potential Loss of Containment as a Fission Product Barrier. - OR – Loss of Containment as a Fission Product Barrier.</i>
U2.2	<b>Reactor Coolant System or Steam Generator Leakage</b>	<i>An Unusual Event is declared because of: an unidentified leak (location unknown) greater than or equal to 10 gallons a minute from the Reactor Coolant System. - OR - an unidentified leak (location unknown) greater than or equal to 10 gallons a minute from the Steam Generator tubes. - OR - an identified leak (location known) greater than or equal to 25 gallons a minute from the Reactor Coolant System.</i>
U3.1	<b>A Risk of Station Blackout Exists - Backup Power Is Available</b>	<i>An Unusual Event is declared because of the loss of all normal electrical power sources for to the power plant for more than fifteen minutes. Emergency backup power is available.</i>
U3.3	<b>Loss of "A" or "B" Plant DC Electricity For More than 15 Minutes during Cold Shutdown or Refueling Shutdown</b>	<i>An Unusual Event is declared because of the loss of ALL of the DC (Direct Current) electrical power supply for more than fifteen minutes.</i>

Enter the EAL number AND the Brief Title (this is the **bold** information) in the Event Description area of the EMERGENCY REPORT FORM – TMI.

EXHIBIT 3

EAL	BRIEF TITLE	EVENT DESCRIPTION
U4.1	<b>Unplanned Loss of Control Room Safety Indicators</b>	<i>An Unusual Event is declared because of the unplanned loss of the majority of the control room's Safety Related Equipment alarms - or - indications. Although other non-alarming indications are available to the Control Room Operators, this situation requires increased surveillance of the safety related equipment and there is the risk that a degraded plant condition could go undetected.</i>
U4.1.1	<b>Unplanned Loss of Onsite or Offsite Communications</b>	<i>An Unusual Event is declared because of the unplanned loss of all onsite communications capabilities. - OR – all offsite communications capabilities.</i>
U4.2	<b>Failure to Complete a Plant Shutdown or Cooldown Within the Required Time Limit</b>	<i>An Unusual Event is declared because the required time limit to perform a plant shutdown - OR - a plant cooldown was exceeded. The Technical Specifications are the power plant's operational guidelines. A Limiting Condition for Operation (LCO) sets a specific time limit that allows continued plant operation while actions are being taken to correct the problem. If the problem cannot be corrected and the plant cannot be shut down or cooled down within the time limit, an Unusual Event must be declared.</i>
U5.1	<b>High River Water Level</b>	<i>An Unusual Event is declared because flood waters are within a few feet of the top of the stone dike that surrounds the power plant. Water is NOT flooding onto the plant site.</i>
U5.2	<b>High Wind Speeds Near Hurricane Force</b>	<i>An Unusual Event is declared because of Sustained Winds greater than 70 mph recorded at TMI. These winds have the potential to damage Plant Equipment.</i>
U5.3	<b>Tornado Strikes Protected Area</b>	<i>An Unusual Event is declared because of a report that a tornado touched down inside the Protected Area of the power plant. There is the potential for damage to structures and equipment inside the Protected Area.</i>
U5.4	<b>Earthquake At Threshold Levels</b>	<i>An Unusual Event is declared because of a minor earthquake detected at the power plant. An earthquake of this magnitude has the potential to damage some equipment, but it is not expected to affect any safety systems. The occurrence of any detectable earthquake warrants increased monitoring by the operators.</i>
U6.1	<b>Fire In The Protected Area</b>	<i>An Unusual Event is declared because of a fire in the Protected Area of the power plant that our site Fire Brigade could not bring under control within 15 minutes of when the fire was confirmed. This fire has the potential to involve Safety Related Equipment if it spreads.</i>
U6.3	<b>Flammable / Toxic Gas That May Affect Operation</b>	<i>An Unusual Event is declared because of the detection of flammable / toxic gas that could enter the power plant site. This gas could affect the safety and health of plant personnel and disrupt normal operation of the power plant.</i>
U6.4	<b>Unexpected Explosion In The Protected Area</b>	<i>An Unusual Event is declared because of an unexpected explosion that caused damage inside the Protected Area of the power plant. This explosion was NOT caused by a bomb. The damage could affect the operation of the plant.</i>

Enter the EAL number AND the Brief Title (this is the **bold** information) in the Event Description area of the EMERGENCY REPORT FORM – TMI.

## EXHIBIT 3

EAL	BRIEF TITLE	EVENT DESCRIPTION
U6.5	<b>Steam Turbine Damage</b>	<i>An Unusual Event is declared because of damage to the steam turbine, including puncturing of the steel casing around the turbine or damage to the generator seals. The hazard of projectiles from the turbine and puncturing of the casing around it decreases the safety level of the plant and could affect the safety and health of plant personnel which affects the operation of the power plant.</i>
U6.6	<b>Vehicle Crash In The Protected Area</b>	<i>An Unusual Event is declared because of a vehicle (airplane, train, helicopter, etc.) that accidentally crashed inside the Protected Area of the power plant. There is the potential for damage to structures and equipment inside the Protected Area.</i>
U7.1	<b>Confirmed Security Event</b>	<i>An Unusual Event is declared because of a confirmed security event, which could potentially degrade the safety level of the power plant. (This event involves: A bomb discovered inside the Protected Area The Protected Area includes major plant structures like the turbine and service buildings that are protected by a security fence and to which access is controlled.) - OR - A Hostile Force inside the Owner Controlled Area (The Owner Controlled Area includes the area between the perimeter chain link fence and the Protected Area).</i>
U8.1	<b>Judgment of the Shift Manager/ Emergency Director - Potential Degradation of Plant Safety</b>	<i>An Unusual Event is declared by the Shift Manager / Emergency Director. The Shift Manager / Emergency Director has the flexibility to declare an event if conditions exist that indicate a potential decrease in the safety level of the plant. These conditions may not be specifically addressed in an emergency procedure. In this situation, the decision to declare an emergency relies on the judgment of the Shift Manager / Emergency Director.</i>

Enter the EAL number AND the Brief Title (this is the **bold** information) in the Event Description area of the EMERGENCY REPORT FORM – TMI.

## EXHIBIT 3

EAL	BRIEF TITLE	EVENT DESCRIPTION
A1.1	<b>Radiological Effluent Limits Are Being Significantly Exceeded</b>	<i>An Alert is declared because an abnormal release of radiation from the power plant has or will exceed 15 minutes and could lead to low level radiation dose rate at or beyond the outer fence line of the plant site.</i>
A1.2	<b>Unexpected Radiation Readings Inside the Power Plant that Affect the Safe Operation of the Plant</b>	<i>An Alert is declared because of abnormally high radiation levels measured inside the power plant, which indicate a serious degradation in the control of radioactive material.</i>
A1.3	<b>Liquid Radioactive Release That Significantly Exceeds Limits</b>	<i>An Alert is declared because a release of radioactive liquid that significantly exceeds the limits of government regulations has lasted for 15 minutes or more.</i>
A1.4	<b>Low Spent Fuel Pool Level With Increased Radiation Levels</b>	<i>An Alert is declared because of the uncontrolled leakage of water from the Spent Fuel Pool with higher than normal radiation levels in the spent fuel pool area of the plant. This condition indicates a serious degradation in the control of radioactive material.</i>
A1.5	<b>Low Fuel Transfer Canal Level With Increased Radiation Levels</b>	<i>An Alert is declared because of the uncontrolled leakage of water from the Fuel Transfer Canal with higher than normal radiation levels in the reactor building. This condition indicates a serious degradation in the control of radioactive material.</i>
A2.1	<b>Potential Loss or Loss of the Fuel Clad - OR - the Reactor Coolant System</b>	<i>An Alert is declared because ONE Fission Product Barrier (other than Containment) has been impacted due to the: Potential Loss of the Fuel Clad Fission Product Barrier - OR - the Reactor Coolant System Fission Product Barrier. - OR - Loss of the Fuel Clad Fission Product Barrier - OR - the Reactor Coolant System Fission Product Barrier.</i>
A3.1	<b>A Risk of Station Blackout Exists – Limited Backup Power Is Available</b>	<i>An Alert is declared because of the loss of all normal electrical power sources for the power plant for more than fifteen minutes. Only one of several sources of emergency electrical power sources is available.</i>
A3.2	<b>Prolonged Station Blackout - Greater than 15 minutes - During Cold Shutdown or Refueling Shutdown</b>	<i>An Alert is declared because of the loss of all normal electrical power sources - AND - the loss of all emergency electrical power sources for more than fifteen minutes (a prolonged Station Blackout) during Cold Shutdown or a Refueling Shutdown.</i>
A4.1	<b>Unplanned Loss of Control Room Safety Indicators With Transient</b>	<i>An Alert is declared because of the unplanned loss of the majority of the control room's Safety Related Equipment alarms - or - indications. - AND - The loss of other non-alarming indications. - OR - A significant change in the power plant's status is in progress. This situation requires increased surveillance of the safety related equipment in order to safely operate the power plant and there is the risk that a degraded plant condition could go undetected.</i>

er the EAL number AND the Brief Title (this is the **bold** information) in the Event Description area of the EMERGENCY REPORT FORM – TMI.

## EXHIBIT 3

EAL	BRIEF TITLE	EVENT DESCRIPTION
A4.2	<b>Failure of the Reactor to Automatically Shutdown - AND - a Successful Manual Reactor Shutdown was Accomplished</b>	<i>An Alert is declared because the Reactor Protection System that is designed to automatically shut down (trip) the reactor failed to do so. The Control Room Operators have manually shut down (tripped) the reactor, but the failure of the automatic system degrades the safety level of the power plant.</i>
A4.3	<b>Loss of All Means of Decay Heat Removal and the Nuclear fuel is Predicted to be Uncovered</b>	<i>An Alert is declared because the operators are unable to provide sufficient cooling water to the reactor following a plant shutdown. This condition reduces the ability of the operators to keep the nuclear fuel cool and degrades the safety level of the power plant.</i>
A5.1	<b>High River Water Level Near Flood Level</b>	<i>An Alert is declared because of flood waters that have the potential to flow over the top of the stone dike that surrounds the power plant. Portions of the plant site may be flooded. This flood has the potential to damage Safety Related Equipment.</i>
A5.2	<b>High Wind Speeds Greater Than Hurricane Force</b>	<i>An Alert is declared because of Sustained Winds greater than 80 mph recorded at TMI. There is the potential for damage to Safety Related Equipment.</i>
A5.3	<b>Tornado Strikes Vital Area</b>	<i>An Alert is declared because of a report that a tornado touched down and has damaged structures and equipment inside the Vital Area of the power plant. This damage could affect Safety Related Equipment.</i>
A5.4	<b>Earthquake At Operating Design</b>	<i>An Alert is declared because of an earthquake at the power plant. An earthquake of this magnitude has the potential to damage some Safety Related Equipment that could affect the ability to protect the public's health and safety. The power plant may be shut down and increased monitoring will be performed by the operators.</i>
A6.1	<b>Fire Affecting Safety Related Equipment</b>	<i>An Alert is declared because of a fire that has affected one of the Safety Related Equipment systems in the Vital Area. (The Vital Area includes structures where safety related equipment is located.) - OR - A fire is in the Protected Area and requires local fire company assistance. The Protected Area includes major plant structures like the turbine and service buildings that are protected by a security fence and to which access is controlled.</i>
A6.2	<b>Control Room Evacuation Initiated</b>	<i>An Alert is declared because of the order to evacuate the Control Room. The absence of personnel in the control room can affect the safe operation of the power plant.</i>
A6.3	<b>Flammable / Toxic Gas Affects Plant Operation</b>	<i>An Alert is declared because of life threatening concentrations of flammable / toxic gas within the Vital Area of the power plant. This presence can affect the safety of plant personnel and the operation of Safety Related Equipment. Evacuation of plant personnel is possible.</i>

Enter the EAL number AND the Brief Title (this is the **bold** information) in the Event Description area of the EMERGENCY REPORT FORM – TMI.

## EXHIBIT 3

EAL	BRIEF TITLE	EVENT DESCRIPTION
<b>A6.4</b>	<b>Unexpected Explosion In The Vital Area</b>	<i>An Alert is declared because of an unexpected explosion that caused damage inside the Vital Area of the power plant. This explosion was NOT caused by a bomb. The damage could potentially affect the ability to protect the public's health and safety.</i>
<b>A6.6</b>	<b>Vehicle Crash In The Vital Area</b>	<i>An Alert is declared because of a vehicle (airplane, train, helicopter, etc.) that accidentally crashed inside the Vital Area of the power plant. The damage could affect Safety Related Equipment.</i>
<b>A7.1</b>	<b>Confirmed Security Event Potentially Affecting Safety Related Equipment</b>	<i>An Alert is declared because of a confirmed security event, which degrades the safety level of the power plant. This event involves: A bomb discovered inside the Vital Area. The Vital Area includes buildings where Safety Related Equipment is located. Damage to this equipment would reduce the ability to protect the public's health and safety. - OR - A Hostile Force inside the Protected Area. The Protected Area includes major plant structures like the turbine and service buildings that are protected by a security fence and to which access is controlled.</i>
<b>A8.1</b>	<b>Judgment of the Shift Manager / Emergency Director – Actual Degradation of Plant Safety</b>	<i>An Alert is declared by the Shift Manager/Emergency Director. The Shift Manager / Emergency Director has the flexibility to declare an event if conditions exist that indicate a potential substantial decrease in the safety level of the plant. These conditions may not be specifically addressed in an emergency procedure. In this situation, the decision to declare an emergency relies on the judgment of the Shift Manager / Emergency Director.</i>

Enter the EAL number AND the Brief Title (this is the **bold** information) in the Event Description area of the EMERGENCY REPORT FORM – TMI.

EXHIBIT 3

EAL	BRIEF TITLE	EVENT DESCRIPTION
S1.1	<b>High Radiological Doses at the Boundary of the Power Plant</b>	<i>A Site Area Emergency is declared because an abnormal release of radiation from the power plant could lead to significant doses of radiation at the boundary of the power plant.</i>
S2.1	<b>Potential Loss or Loss of the Fuel Clad – AND- Potential Loss or Loss of the Reactor Coolant System</b>	<i>A Site Area Emergency is declared because TWO of the Fission Product Barriers have been impacted due to the: Loss of the Fuel Clad Fission Product Barrier - AND - the Potential Loss of the Reactor Coolant System Fission Product Barrier. - OR - Potential Loss of the Fuel Clad Fission Product Barrier - AND - the Potential Loss of the Reactor Coolant System Fission Product Barrier. - OR – Potential Loss of the Fuel Clad Fission Product Barrier - OR – the Potential Loss of the Reactor Coolant System Fission Product Barrier - AND - the Loss of Any Other Fission Product Barrier.</i>
S3.1	<b>Prolonged Station Blackout - Greater than 15 Minutes</b>	<i>A Site Area Emergency is declared because of the loss of all normal electrical power sources for the power plant for more than fifteen minutes – AND - the loss of all emergency electrical power sources for more than fifteen minutes. This is called a Station Blackout.</i>
S3.3	<b>Loss of All Plant DC Electricity For More than 15 Minutes when the plant is not in Cold Shutdown or Refueling Shutdown</b>	<i>A Site Area Emergency is declared because of the loss of all DC (Direct Current) electrical power for more than fifteen minutes.</i>
S4.1	<b>Unplanned Loss of All Control Room Safety Indicators With Transient</b>	<i>A Site Area Emergency is declared because of the unplanned loss of all Safety Related Equipment indications and alarms - AND - A significant change in the power plant's status is in progress. The control room staff is unable to adequately monitor the systems necessary to safely control the power plant and insure protection of the public's health and safety.</i>
S4.2	<b>Failure of the Reactor to Automatically Shutdown - AND - a Manual Reactor Shutdown could not be Accomplished</b>	<i>A Site Area Emergency is declared because the Reactor Protection System that is designed to automatically shut down (trip) the reactor failed to do so AND the Control Room Operators were unable to manually shut down (manually trip) the reactor from the control room. This condition reduces the ability of the operators to control the power plant and creates conditions that could lead to damage of the nuclear fuel or the steel reactor vessel and associated piping. This condition impacts the ability to protect the health and safety of the public.</i>
S4.3	<b>Loss of All Means of Decay Heat Removal - AND – Indications that the Nuclear fuel is Uncovered</b>	<i>A Site Area Emergency is declared because the operators are unable to provide sufficient cooling water to the reactor following a plant shutdown – AND - the increased heat has caused the water in the reactor to boil and uncover the fuel. This condition reduces the ability of the operators to keep the nuclear fuel cool, degrades the safety level of the power plant and decreases the ability to protect the public's health and safety.</i>

Enter the EAL number AND the Brief Title (this is the **bold** information) in the Event Description area of the EMERGENCY REPORT FORM – TMI.

## EXHIBIT 3

EAL	BRIEF TITLE	EVENT DESCRIPTION
<b>S4.4</b>	<b>Loss of Both Methods Needed to Maintain the Nuclear Reactor in Hot Shut Down</b>	<i>A Site Area Emergency is declared because of the loss of the ability to cool the reactor after it is shut down. This condition reduces the ability of the operators to keep the nuclear fuel cool and degrades the safety level of the power plant and the ability to protect the public's health and safety.</i>
<b>S6.2</b>	<b>Control Room Evacuation Completed Without Complete Plant Control</b>	<i>A Site Area Emergency is declared because of the evacuation of the Control Room - AND - the inability to confirm effective cooling of the nuclear fuel within 15 minutes. The absence of personnel in the control room and the lack of effective cooling of the nuclear fuel can affect the operation of Safety Related Equipment and the ability to protect the public's health and safety.</i>
<b>S7.1</b>	<b>Confirmed Security Event Affecting Safety Related Equipment</b>	<i>A Site Area Emergency is declared because of a confirmed security event that degrades the safety level of the power plant and the ability to protect the public's health and safety. This event involves: A bomb that has exploded inside the Vital Area. The Vital Area includes buildings where Safety Related Equipment is located. Damage to this equipment would reduce the ability to protect the public's health and safety. - OR - A Hostile Force inside the Vital Area.</i>
<b>S8.1</b>	<b>Judgment of the Shift Manager / Emergency Director – Actual Failures of Safety Systems</b>	<i>A Site Area Emergency is declared by the Shift Manager / Emergency Director. The Shift Manager / Emergency Director has the flexibility to declare an event if conditions exist that indicate the likely or actual major failure of plant functions needed to protect the public's health and safety. These conditions may not be specifically addressed in an emergency procedure. In this situation, the decision to declare an emergency relies on the judgment of the Shift Manager / Emergency Director.</i>

Enter the EAL number AND the Brief Title (this is the **bold** information) in the Event Description area of the EMERGENCY REPORT FORM – TMI.

## EXHIBIT 3

EAL	BRIEF TITLE	EVENT DESCRIPTION
G1.1	<b>High Radiological Doses at the Boundary of the Power Plant that Exceed Protective Action Guideline (PAG) Limits</b>	<i>A General Emergency is declared because an abnormal release of radiation from the power plant that could lead to high doses of radiation at the boundary of the power plant. This condition may require that protective actions be implemented for members of the public living around Three Mile Island.</i>
G2.1	<b>Loss of ANY TWO of the Fission Product Barriers – AND – the Potential Loss of the third</b>	<i>A General Emergency is declared because TWO of the Fission Product Barriers have been Lost and there is at least the Potential Loss of the third barrier.</i>
G3.1	<b>Prolonged Station Blackout – Greater than 4 hours</b>	<i>A General Emergency is declared because of the loss of all normal electrical power sources for the power plant for more than four hours - AND - the loss of all emergency electrical power sources for more than four hours (a prolonged Station Blackout) - AND - the overheating of the nuclear fuel.</i>
G4.2	<b>Failure of the Reactor to Automatically Shutdown - AND – a Manual Reactor Shutdown could not be Accomplished - AND – Operators are Unable to Cool the Nuclear fuel</b>	<i>A General Emergency is declared, because the Reactor Protection System that is designed to automatically shut down (trip) the reactor failed to do so AND, the Control Room Operators were unable to manually shut down (manually trip) the reactor from the control room AND, the operators are unable to cool the nuclear fuel.</i>
G7.1	<b>Confirmed Security Event Loss of Plant Control</b>	<i>A General Emergency is declared because of a confirmed security event that prevents the operators from being able to place the power plant in Cold Shutdown. This condition seriously degrades the safety level of the power plant and the ability to protect the public's health and safety. This event involves: The loss of physical control of the Control Room. - OR - The loss of physical control of the Remote Shutdown Control Area.</i>
G8.1	<b>Judgment of the Shift Manager / Emergency Director - Safety System Failures and Potential Radioactive Release</b>	<i>A General Emergency is declared by the Shift Manager / Emergency Director. The Shift Manager / Emergency Director has the flexibility to declare an event if conditions exist that could result in substantial fuel damage and a substantial uncontrolled radiation release. - OR - have resulted in substantial fuel damage and a potential uncontrolled radiation release.</i>

Enter the EAL number AND the Brief Title (this is the **bold** information) in the Event Description area of the EMERGENCY REPORT FORM – TMI.

**EXHIBIT 4**

**Emergency Director/Emergency Support Director  
Turnover Checklist**

**NOTE**

- a. This form is to be used for ALL turnovers.
- b. **In the ECC:** The Emergency Director or the Emergency Director Assistant may complete this form.
- c. **In the EOF:** The Emergency Support Director or the Emergency Support Director Assistant may complete this form.

**EVENT CLASSIFICATION**

**NOTIFICATIONS COMPLETED**

Level of Emergency	Date	Time (Hours)	15 minute Notifications COMPLETE		1 hour NRC Notification COMPLETE		1 hour ERDS ACTIVATED	
			YES	NO	YES	NO	YES	NO
UNUSUAL EVENT								
ALERT								
SITE AREA EMERGENCY								
GENERAL EMERGENCY (PAR required)								

**PRESS RELEASE INFORMATION**

ACTION	YES	NO
Information given to the Duty <b>Public Information Representative</b>		
VERBALLY approved Press release		
DRAFT release in review		
PRESS release APPROVED		

**EVENT DESCRIPTION**

(Include pre-event information, current information, EALs, and Actions taken/planned)


**\*\*\* INFORMATION REGARDING PARs, NOT FOR PUBLIC RELEASE \*\*\***

PAR has been provided to the STATE

<b>YES (√)</b>		<b>NO (√)</b>		<b>N/A (√)</b>	
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**IF YES, PAR RECOMMENDED**


**PROTECTIVE ACTION IMPLEMENTED BY THE STATE, IF KNOWN**


**PLANT STATUS**

**REACTOR STATUS**

**POWER OPERATION**

\_\_\_\_\_ % POWER STEADY STATE       MANUAL SHUTDOWN @ \_\_\_\_\_ %/min  
 HOT STANDBY       HOT SHUTDOWN

**SHUTDOWN**

REACTOR TRIP      \_\_\_\_\_ AUTOMATIC      \_\_\_\_\_ MANUAL

**COOLDOWN**

COOLDOWN @ \_\_\_\_\_ °F/hr via  
 FORCED CIRC with \_\_\_\_\_ PUMPS       NATURAL CIRC with \_\_\_\_\_ ΔT  
 Other (Explain) \_\_\_\_\_

**COLD SHUTDOWN**

DHR 'A'       DHR 'B'       LPI 'A'       LPI 'B'  
 OTHER (Specify) \_\_\_\_\_


**ELECTRICAL STATUS** (Available)

System GRID  
 Main Generator  
 Emergency Diesels     'A'     'B'     SBO  
 Battery                     'A'     'B'  
 OTHER (Specify) \_\_\_\_\_


**EXHIBIT 4**

**FISSION PRODUCT BARRIER STATUS**

**REACTOR COOLANT SYSTEM**

Barrier	INTACT (√)	POTENTIAL LOSS (√)	Leak rate (gpm), If KNOWN	LOSS (√)	Leak rate (gpm), If KNOWN
RCS (NOT OTSG)		/	/	/	/
OTSG 'A'		/	/	/	/
OTSG 'B'		/	/	/	/

**CONTAINMENT BUILDING**

Barrier	INTACT (√)	POTENTIAL LOSS (√)	LOSS (√)
Building Integrity			
Bypass RB (e.g., OTSG leak to atmos.)			

**FUEL CLAD INTEGRITY**

Barrier	INTACT (√)	POTENTIAL LOSS (√)	LOSS (√)
ad			

**EMERGENCY SYSTEMS ACTUATED**

- NONE
- EMERGENCY FEEDWATER (EFW)
- HIGH PRESSURE INJECTION (HPI)
- CORE FLOOD (CF)
- LOW PRESSURE INJECTION (LPI)
- REACTOR BUILDING SPRAY (BS)

**PROBLEMS AT UNIT 2**


**OPEN TECHNICAL ISSUES (Provide specific details, including priority)**


**EXHIBIT 4**

**RADIOLOGICAL CONDITIONS**

Is an abnormal, unplanned or uncontrolled release (monitored or unmonitored) in progress or suspected?

**YES**    **NO**    **N/A**

If **YES**, specify the release pathway:

\_\_\_\_\_

\_\_\_\_\_

If **YES**, describe release type:

**Airborne** release    **Liquid** release    Unknown

Other (Specify

\_\_\_\_\_

\_\_\_\_\_

Have Field Monitoring Teams (**FMT**) been dispatched?    **YES**    **NO**

Have abnormal ON SITE or OFF SITE radiological conditions been detected by:

Reuter Stokes    Field Monitoring Team

Details:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Abnormal radiation levels IN PLANT:    **YES**    **NO**

Details (Location):

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**HAZMAT**

A HAZARDOUS MATERIAL EVENT HAS OCCURRED (See 1203-44)    **YES**    **NO**

HAS ENVIRONMENT AFFAIRS BEEN INFORMED?    **YES**    **NO**

HAS THE HAZARDOUS MATERIAL ENTERED THE RIVER?    **YES**    **NO**

DETAILS (Location, Chemical, actions taken, etc.)

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Emergency Direction**

**EXHIBIT 4**

**PERSONNEL STATUS**

PERSONNEL INJURED  **YES** HOW MANY \_\_\_\_\_  **NO**  
 INJURED & CONTAMINATED  **YES** HOW MANY \_\_\_\_\_  **NO**  
 TRANSPORT OFFSITE  **YES** HOW MANY \_\_\_\_\_  **NO**  
 SPECIFY THE OFFSITE FACILITY \_\_\_\_\_

**PERSONNEL CONTAMINATED**  **YES** HOW MANY \_\_\_\_\_  **NO**

DETAILS:

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ON-SITE ACCOUNTABILITY REQUIRED?  **YES**  **NO**  
 IF YES, IS IT COMPLETE?  **YES**  **NO**

IS NON-ESSENTIAL PERSONNEL MUSTER REQUESTED?  **YES**  **NO**  
 IF YES, LOCATION; \_\_\_\_\_

HAVE NON-ESSENTIAL PERSONNEL BEEN EVACUATED?  **YES**  **NO**  
 IF YES, LOCATION; \_\_\_\_\_

**OTHER ISSUES**

DETAILS (Security, 10CFR50.54(x), etc.)


JRM COMPLETED BY \_\_\_\_\_ DATE \_\_\_\_\_ TIME \_\_\_\_\_  
 (NAME)

**EXHIBIT 5**

**Emergency Director Briefing Sheet**

**NOTE**

This checklist may be completed by the Operations Coordinator.

1.0 Conduct a briefing periodically. (**Hourly and after significant changes in plant conditions**).

**Briefing Time** \_\_\_\_\_

a. Emergency classification/emergency organization status

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

b. Plant status (temperature, pressure, leak rate, equipment status etc.)

RCS Temp	RCS Press	RCP Status
_____	_____	_____
RB Sump	RB Flood	BWST
_____	_____	_____

\_\_\_\_\_  
\_\_\_\_\_

c. Radiological conditions (specific release pathway, verify release duration, in plant radiological conditions, etc.)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**EXHIBIT 5**

d. Work in progress (equipment problems, evolutions in progress, etc.)

Priority jobs to mitigate event

1) \_\_\_\_\_

2) \_\_\_\_\_

3) \_\_\_\_\_

4) \_\_\_\_\_

Other \_\_\_\_\_

e. Personnel status (muster, accountability, evacuation, contamination, etc.)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

f. Security and offsite support (security conditions, required offsite support)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

g. Mitigating activities, future plans

1) Refer to Exhibit 7 and attach any authorized deviations from requirements.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Briefing Completed \_\_\_\_\_  
Emergency Director

**EXHIBIT 6**

**ECC Accountability**

1. The Emergency Director has directed NON-ESSENTIAL personnel to muster (warehouse 1 or 3) or Evacuate (Training Center or EOF) initiating protected area accountability.
2. Instruct all ECC personnel to process through the accountability key-card reader on the right side of the computer console (above the printer).

**NOTE**

DO NOT use the normal door key-card reader for accountability processing.

3. The green light on the accountability key-card reader should flash after each card is read. This indicates that the person has been accounted for by the system.
  - 3.1 A flashing red light indicates that a problem exists. Notify Security of any badges that cause the red light to flash.

If the OSC is not activated and accountability is initiated perform the following:

- 4.1 Contact all in-plant personnel that have been dispatched into the plant and obtain their key-card number. (This is a hand written number on the back side of the key-card). It is important to obtain the **key-card number and NOT the individuals security badge number**.
- 4.2 Enter the key-card number, for personnel in the plant, using the key-pad on the accountability key-card reader as follows:
  - 4.2.1 Press the '\*' button,
  - 4.2.2 Enter the number (using the number buttons),
  - 4.2.3 Press the '\*' button and
  - 4.2.4 PAUSE, look for the green light to flash.
  - 4.2.5 Repeat the process for each number you must enter.
- 4.3 Inform Security when the personnel in the ECC have been processed into the accountability key-card reader.
5. Contact the Security Coordinator (Ext. 8038, 8039 or 8040) for status of accountability (preliminary list of names) if not provided 30 minutes after Protected Area accountability was initiated.

**EXHIBIT 7**  
**Emergency Director Authorization Form**  
**For Deviations From Requirements**

DATE OF REQUEST \_\_\_\_\_

TIME OF REQUEST \_\_\_\_\_

- Are there any other alternatives available? YES / NO
  - Has an SRO concurred with the deviation? NAME \_\_\_\_\_ YES / NO
  - Has the Technical Staff been consulted (if time permits)? \_\_\_\_\_ YES / NO  
Contact Name
- If yes, does the Technical Staff concur with the deviation? YES / NO

I. Deviations authorized under the Emergency Plan (Direction and Coordination; ED/ESD responsibilities):

Deviations from operating procedures, emergency procedures, emergency plan implementing procedures (beyond the flexibility of AP1001G), or normal equipment operating limits that do not result in a deviation from license condition.

II. Deviations authorized by 10 CFR 50.54(x) and (y) for the protection of public health and safety:

1. These deviations must be reported to the NRC under 10 CFR 50.72(b)(1)(i)(B), preferably before taking the action, and in ALL cases within one hour of taking the action.

- A.  Departure from a Technical Specification requirement.
- B.  Departure from the License (Specific limitations imposed on the plant operation)
- C.  Departure from a License condition (**Refer to Page 2 of Exhibit 7**)
- D.  Departure from NRC Rules, Regulations, or Orders.

**Refer to Page 3 of Exhibit 7, for additional information and regulatory excerpts.**

III. Specify the details of the deviation (I or IIA/B/C/D): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Why is the deviation necessary for the protection of public health and safety?  
\_\_\_\_\_  
\_\_\_\_\_

Authorized by the Emergency Director: \_\_\_\_\_  
(Signature) (Date)

**NRC Notified under 50.72(b)(1)(i)(B) by: (Within one hour of the deviation)**

\_\_\_\_\_  
(Name) (Time) (Date)

NRC Contact \_\_\_\_\_  
Name

EXHIBIT 7

Emergency Director Authorization Form For Deviations From Requirements  
License Conditions

REGULATION	REQUIREMENT	DESCRIPTION	DEVIATION Check II.C and complete page E10-1 of this Exhibit
10 CFR 50.54(a) 10 CFR 50 APP. B	OQA PLAN	Plan to insure quality in all phases of Nuclear Plant operation and to enhance Safety.	A 50.54(x) <b>DEVIATION</b> consists of not implementing the OQA Plan or a section of the Plan to protect public safety and health. There are not any examples that meet the criteria for a DEVIATION that would still provide protection of public health and safety. Any instance of not complying is a violation, but not a valid DEVIATION.
10 CFR 50.54(k)	RO or SRO at controls	Licensed operator must be at the plant controls at all times.	A 50.54(x) <b>DEVIATION</b> is when licensed operators are not "at the controls" in the Control Room or at the Remote Shutdown panels, taking actions to protect public health and safety.
10 CFR 50.54(m)	SRO onsite	This is a regulatory requirement supplemented by Section 6 Tech Specs.	It is not conceivable to have a 50.54(x) <b>DEVIATION</b> for this item (No SRO on site) that would still protect public health and safety.
10 CFR 50.54(p) 10 CFR 73.55	Safeguards and Security Plan	Requirement for Physical Security and control of information pertaining to the methods employed.	A 50.54(x) <b>DEVIATION</b> is not implementing a portion of the Security Plan, and not decreasing the protection of public health and safety. Implementing a specific portion of the Plan but in a different manner is NOT a 50.54(x) DEVIATION. However, the alternate actions should have been approved by appropriate management.
10 CFR 50.54(q) {10 CFR 50.47(b) & 10 CFR 50 APP. E}	Emergency Plan	The sub-parts of this item are: <ul style="list-style-type: none"> <li>* Standard Classification</li> <li>* Notification of Local, State and Federal organizations</li> <li>* Radiological monitoring equipment for measurement and assessment</li> <li>* Protective Action Recommendations (PAR)</li> <li>* Controlling radiological exposures</li> <li>* Activation of the Emergency Response Organization (ERO)</li> <li>* Activation/use of Emergency Facilities</li> <li>* Use of ERDS (Emergency Response Data System)</li> </ul>	All of these sub-parts of the Emergency Plan are implemented via Implementing procedures. Examples of 50.54(x) <b>DEVIATIONS</b> , while protecting public health and safety follow: <b>Deciding intentionally to NOT-</b> <ul style="list-style-type: none"> <li>*Control exposures of all workers per EPA-400 limits</li> <li>*Activate the Emergency Response organization</li> <li>*Use/Activate Emergency Facilities</li> </ul> The other items of this part do not meet the criteria for a 50.54(x) DEVIATION that would still protect the public health and safety. Any instance of not complying with these parts is a violation, but not a valid DEVIATION.
10 CFR 50.54(z)	NRC Operations Center	Must notify and maintain communications.	A 50.54(x) <b>DEVIATION</b> is when the NRC is NOT notified or when communications with the NRC is being suspended without NRC concurrence for the protection of public health and safety.

**EXHIBIT 7**

**Attachment to Emergency Director Authorization Form for Deviations from Requirements**

50.54(x): A licensee may take reasonable action that departs from a license condition or a technical specification (contained in a license issued under this part) in an emergency when this action is immediately needed to protect the public health and safety and no action consistent with license conditions and technical specifications that can provide adequate or equivalent protection is immediately apparent.

**NOTE**

The NRC has interpreted 50.54(x) to apply to NRC rules, regulations and orders as well.

50.54(y): Licensee action permitted by paragraph (x) of this section shall be approved, as a minimum, by a licensed senior operator prior to taking the action.

73.55(a): In accordance with Sections 50.54(x) and (y) of Part 50, the licensee may suspend any safeguards measures pursuant to Section 73.55 in an emergency when this action is immediately needed to protect the public health and safety and no action consistent with license conditions and technical specifications that can provide adequate or equivalent protection is immediately apparent. This suspension must be approved as a minimum by a licensed senior operator prior to taking the action. The suspension of safeguards measures must be reported in accordance with the provisions of 73.71. Reports made under Section 50.72 need not be duplicated under 73.71.

**NOTE**

In essence, no one below a licensed SRO individual can make the decision to depart from the License. However, if a more senior manager is present (i.e., Emergency Director) even though he does not possess an SRO license the decision authority would be passed to him as a higher authority in the chain of command. The licensed SRO shall provide his best judgement to the ED for his consideration. Beyond that the SRO shall follow the orders of his supervisor. It is imperative that the Emergency Director consult to the fullest extent practicable with the SRO and the Technical Staff in arriving at a decision to deviate from prescribed procedures. However, Emergency Operating Procedures should not generally be deviated from.

50.72 Any deviation from the plant's technical specifications authorized pursuant 50.54(x) of this part.

**NOTE**

Such reports should be made as soon as practical, and in all cases within one hour. (See 1044 and LS-AA-125).

The NRC interprets the reporting requirement to cover ANY departure under 50.54(x) and (y), and is not limited to Technical Specification deviations.

EXHIBIT 8  
TMI PAR LOGIC DIAGRAM

**SITE AREA EMERGENCY IS DECLARED**

Determine which initial PAR is appropriate if a GENERAL EMERGENCY is declared.

- (1) Evacuate the 5 mile radius around the plant and shelter the 5 to 10 mile radius around the plant  
OR
  - (2) Shelter the 10 mile radius around the plant
- Continue assessment of all available Plant and Field Monitoring information.

**GENERAL EMERGENCY IS DECLARED**

**EVACUATE THE 5 MILE RADIUS AROUND THE PLANT AND SHELTER THE 5 TO 10 MILE RADIUS AROUND THE PLANT UNLESS IT IS KNOWN THAT SHELTERING OF THE 10 MILE RADIUS AROUND THE PLANT WILL OFFER GREATER PROTECTION.**

(See NOTE below)

**CONTINUE ASSESSMENT BASED ON ALL AVAILABLE PLANT DATA AND FIELD MONITORING INFORMATION**

**Expand EVACUATION recommendation to the 10 mile radius around the plant if VALID dose assessment/measurement information indicates that areas outside the 5 mile radius will exceed 1 REM TEDE or 5 REM CDE (Child Thyroid)**

**NOTE**

- The intent is to evacuate the 5 mile radius around the plant as an initial PAR. The decision to recommend sheltering rather than evacuation should be made **ONLY** when it is clear that the evacuation Cannot be completed within the release time.  
For example, the release has already stopped, the release can be stopped simply by turning off a piece of equipment, or there is a deliberate venting of the Containment Building with more than one valve available for isolation.

**SECURITY EVENT**

- When **EITHER** the Control Room or the Remote Shutdown area is available the initial PAR should be to **SHELTER** the 10 mile radius around the plant.
- When **BOTH** the Control Room and the Remote Shutdown area are lost the initial PAR should be to **EVACUATE** the 5 mile radius and **SHELTER** the 5 to 10 mile radius around the plant.

**EXHIBIT 8A**

**PAR Notification Form**

**INITIAL PAR**

Call the STATE EOC	
STATE EOC	(717) 651-2001/2002
Pennsylvania Governor	(717) 651-2148
PEMA	Notification line (DLM-6), PEMA, Dial 37

This is a drill. This is a drill.

This is **NOT** a drill. This is **NOT** a drill.

"This is \_\_\_\_\_ representing Three Mile Island Nuclear Station, may I speak to the  
(Name)  
SENIOR OFFICIAL at the EOC."

When the SENIOR OFFICIAL at the STATE EOC comes on the line read the following.

"This is \_\_\_\_\_ representing Three Mile Island Nuclear Station, we are making the  
(Name)  
following Protective Action Recommendation (PAR) to the State EOC:

Evacuate the 5 mile radius around the plant and shelter the 5 to 10 mile radius around the plant.

Shelter the 10 mile radius around the plant."

OPTIONAL:

Basis for PAR:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

This is a drill. This is a drill.

This is **NOT** a drill. This is **NOT** a drill.

Signature \_\_\_\_\_ Time \_\_\_\_\_ Date \_\_\_\_\_

Senior State Official Notified \_\_\_\_\_

**EXHIBIT 8B**

**PAR Notification Form**

**EXPANSION OF PAR**

Call the STATE EOC

STATE EOC

(717) 651-2001/2002

Pennsylvania Governor

(717) 651-2148

PEMA

Notification line (DLM-6), PEMA, Dial 37

This is a drill. This is a drill.

This is **NOT** a drill. This is **NOT** a drill.

"This is \_\_\_\_\_ representing Three Mile Island Nuclear Station, may I speak to the  
(Name)  
SENIOR OFFICIAL at the EOC."

When the SENIOR OFFICIAL at the STATE EOC comes on the line read the following.

"This is \_\_\_\_\_ representing Three Mile Island Nuclear Station, we are making the  
(Name)  
following Protective Action Recommendation (PAR) to the State EOC because of changing conditions:

Evacuate the \_\_\_\_\_ mile radius around the plant

and Shelter the \_\_\_\_\_ to \_\_\_\_\_ mile radius around the plant."

OPTIONAL:

Basis for PAR EXPANSION:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

This is a drill. This is a drill.

This is **NOT** a drill. This is **NOT** a drill.

Signature \_\_\_\_\_ Time \_\_\_\_\_ Date \_\_\_\_\_

Senior State Official Notified \_\_\_\_\_

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**EXHIBIT 9**  
**Operations Coordinator Checklist**

Page 1 of 2

- \_\_\_\_\_ a. Assess current plant conditions.
- Verify that all controllable releases are stopped.
    - i) If necessary, due to potential contamination of non-contaminated sumps and/or tanks, closely monitor the contents or release.
    - ii) If any hazardous spill is involved (e.g., BWST, oil, etc.) verify implementation of Abnormal Procedure 1203-44.
    - iii) If any contaminated or potentially contaminated injuries occur insure that the ECC has implemented EPIP-TMI-16.
  - Verify that the proper procedures are being used.
  - Verify that procedures are signed off.
  - Verify that the proper Emergency Plan declaration was made.
    - i) Perform a "Look Ahead" for event escalation.
  - Verify that deviations from requirements have been authorized in accordance with Exhibit 7.
  - Determine if Control Tower ventilation should be placed on recirc.
  - Verify that the RAC has appropriate assumptions for release calculations.
    - i) Leak rate
    - ii) Release rate
    - iii) Release path
    - iv) Release duration
    - v) Etc.
- \_\_\_\_\_ b. Complete Exhibit 5, ED Briefing Sheet for ED briefings.
- Insure Briefing Time is recorded on the Briefing Sheet. \_\_\_\_\_  
Record Time of Briefing
- \_\_\_\_\_ c. Insure that ED briefings are given:
- At least once per hour.
  - After significant changes
- \_\_\_\_\_ d. Establish communications with the Technical Support Center.
- Brief the TSC upon its activation Time Activated \_\_\_\_\_
  - Prioritize
    - i) Jobs
    - ii) Requests

TMI Emergency Plan  
Implementing Document

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**Emergency Direction**

**EXHIBIT 9**

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- \_\_\_\_\_ e. Establish communications with the Operations Support Center.
- Brief the OSC upon its activation Time Activated \_\_\_\_\_
  - Prioritize
    - i) Jobs
    - ii) Requests
- \_\_\_\_\_ f. The ECC is activated by the IREO (duty roster) personnel. Time Activated \_\_\_\_\_
- \_\_\_\_\_ g. Determine from the ESD when the EOF is activated. Time Activated \_\_\_\_\_

**EXHIBIT 10**

**ED Assistant Checklist**

\* Items which should be performed in a timely manner, upon arrival at the ECC

\_\_\_ \*a. Obtain information on the Plant Status from:

- Operations Coordinator
- Emergency Director

\_\_\_ • Assist in the completion of or complete Exhibit 4, Turnover Checklist

b. Verify that the following communication requirements are being met:

- \_\_\_ • PEMA and the 5 risk counties are notified of the event within 15 minutes of declaration.

**NOTE**

If the ED has NOT retained offsite notifications, contact the ESD Assistant to obtain this information.

- \_\_\_ • NRC is notified within 60 minutes of event declaration.

- \_\_\_ • ERDS is activated within 60 minutes of ALERT or higher declaration.

- \_\_\_ • EPIP-TMI-.16 notifications, if required.

\*c. Verify the following:

- \_\_\_ • Contact / Call out is in progress or has been completed.

\_\_\_ \*d. Meet with the PI REP-ECC as needed to provide information regarding plant status.

\_\_\_ e. Periodically provide a plant status update to the ECC Communications Coordinator.

\_\_\_ f. Obtain Press Releases from the PI REP-ECC for review prior to submittal to the ED for APPROVAL.

**NOTE**

Perform review of Press Releases in a timely manner. It is expected that Press Releases are prepared, reviewed and issued within an hour of an event.

- \_\_\_ • Initial the Press Release to signify your review.

i) Use Exhibit 13, Press Release Guidance, to enhance your review.

**EXHIBIT 10**

**ED Assistant Checklist**

- \_\_\_\_\_ • Coordinate the following:
  - i) RAC review of the proposed Press Release with initials to verify review
  - ii) SECURITY review, if applicable, with initial to verify review
  - i) Security review and response is via Telecopy of the Press Release
- \_\_\_\_\_ • Provide the reviewed Press Release to the ED for timely review and APPROVAL
  - i) The ED should be able to read and approve the Press Release in < 5 minutes.
- g. Serve as "Point of Contact" for the following:
  - \_\_\_\_\_ • PI REP-ECC
  - \_\_\_\_\_ • Emergency Assembly Area Coordinator (EAAC)
  - \_\_\_\_\_ • Security Coordinator
  - \_\_\_\_\_ • ECC Communications Coordinator and Communicators
  - \_\_\_\_\_ • NEI (Technical), until relieved by the ESD Assistant
  - \_\_\_\_\_ • EPRI, until relieved by the ESD Assistant
  - \_\_\_\_\_ • ANI, until relieved by the ESD Assistant
  - \_\_\_\_\_ • INPO, until relieved by the Group Leader Admin Support
- h. If the ED directs Accountability, complete Exhibit 6, ECC Accountability.
  - \_\_\_\_\_ i. Contact Security to perform "Fitness for Duty" testing for anyone reporting to work that is suspected of NOT being "Fit for Duty" (Reported by the responder or others)

**EXHIBIT 10  
ED Assistant Checklist**

- j. Coordinate the site evacuation of non-essential personnel in accordance with EPIP-TMI-.36, as soon as possible after the Muster has been ordered but prior to the site evacuation.
  - Complete the evacuation announcement from Exhibit 11.
    - a. From ED and RAC discussions, obtain the following:
      - i) Remote Assembly Area (RAA)
      - ii) Route to RAA
      - iii) Gates/Bridge(s) for island exit
      - iv) Need for traffic control
  - Provide the following information to the Security Coordinator.
    - a. Evacuation is expected
    - b. Gate(s)/Bridge(s) to be used
    - c. RAA to be used
    - d. Prepare to distribute the appropriate maps at the designated Bridge(s)
  - Discuss the following with the EAAC.
    - a. Number of people expected to be evacuated
      - i) Insert this number on the Evacuation Announcement in Exhibit 11.
    - b. Evacuation is to be expected
    - c. Gate(s)/Bridge(s) to be used
    - d. RAA to be used
  - Complete the following when the ED directs (orders) the evacuation:
    - a. Direct the ECC Communications Coordinator to notify Dauphin County and PEMA using the ED approved message from Exhibit 11.
    - b. Inform the Security Coordinator of the evacuation BEFORE announcing the evacuation over the Plant Page system.
    - c. Inform the EAAC of the evacuation BEFORE announcing the evacuation over the Plant Page system.
    - d. IF the EOF has been activated, THEN inform the EOF (Group Leader Admin Support) of the evacuation before announcing the evacuation over the Plant Page system.
    - e. Announce the site evacuation of non-essential personnel over the Plant Page system using the ED approved message from Exhibit 11.
      - i) IF the EOF is the designated Remote Assembly Area (RAA) AND the EOF has been activated, THEN direct the Group Leader Admin Support to make preparations for the monitoring and potential decontamination of the evacuees.

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**EXHIBIT 10**

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**ED Assistant Checklist**

- \_\_\_\_\_ • Direct the ECC Communications Coordinator to call the following agencies AFTER the EAAC informs you that non-essential personnel evacuation is complete:
  - a. Dauphin County
  - b. PEMA
  
- \_\_\_\_\_ k. Evaluate AP1044, Incident Report, and AP 1097, Corrective Action Process, and complete appropriate forms for ED review and concurrence.
  
- \_\_\_\_\_ l. Coordinate the development of a watchbill to support the emergency on a 24 hour per day basis for the ECC.
  
- \_\_\_\_\_ m. At the closeout of the event verify the following:
  - All logs, procedures and checklists are completed
  - All logs, procedures and checklists are turned over to the Shift Manager/Emergency Director.



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**EXHIBIT 12**

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**Public Information Representative - ECC**

- \_\_\_\_\_ a. Verify that the Control Room fax and the Public Information telephone in the Shift Manager's office are operational.
- \_\_\_\_\_ b. Call 948-8817 and leave a message informing the Duty PI-Rep of your arrival at your Duty Station.
- \_\_\_\_\_ c. Gather information about the emergency and provide it to the Press Release Writer.
  - Remain at the counter in the Control Room, except to access the Radiological Assessment Coordinator (RAC), STA or ED Assistant, as necessary.
  - Be especially attentive to any radiological situation, whether or not a radiation release is occurring. ANY release of radiation in the context of the emergency SHOULD be reported to the Press Release Writer.
  - Use the "Plant Emergency Information Checklist" (Refer to Exhibit 1B of the TMI Emergency Communications Response Manual) to obtain plant information.

**NOTE**

Plant information is available from the Plant Process Computer - Area 38, Groups 19 & 20.

- i) Information not obtained directly from plant indications needs to have ED Assistant review and ED approval.
  - ii) Fax the authorized information to the Media Briefer.
- Continually update the Media Briefer and the PI REP-EOF using the Emergency Information Checklist.

**NOTE**

You are also required to provide real-time information about plant conditions, without ED approval, to the JIC staff in order to assist the Media briefer's understanding of changing plant conditions.

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**EXHIBIT 12**

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**Public Information Representative - ECC**

d. Press Releases

- When DRAFT Press Releases are received REVIEW them for accuracy before submitting them to the ED Assistant for review and ED APPROVAL. Refer to Exhibit 13, Press Release Guidance, to enhance your review.
  - a. Depending on the change required either mark up the DRAFT and give it to the ED Assistant or have the Press Release Writer make the corrections before the ED Assistant sees the DRAFT release.
  - b. Press Releases announcing anything other than emergency level changes or Media advisories (e.g., JIC activated) must be approved by the Emergency Director
    - i) When the EOF is activated the approval responsibility for Press Releases is transferred to the ESD at the EOF.
    - ii) If review and approval of a Press Release has been started in the Control Room when the EOF becomes operational finish the approval process of that Press Release in the Control Room. DO NOT switch to the EOF in the middle of a review and approval process.
  - c. Fax the initialed (APPROVED) DRAFT Press Release to the Press Release Writer to obtain a final Press Release.
    - i) Call the Press Release Writer and provide the changes verbally to expedite the Press Release process.
  - d. Maintain copies of the Press Releases.
  - e. Provide a copy of ALL APPROVED Press Releases to the ED.
- Ensure that emergency level changes and the criteria for those changes are **IMMEDIATELY** communicated to the Media Briefer.
  - Obtain a copy of the completed Emergency Report Form-TMI from the ECC Communications Coordinator and transmit to the Media Briefer at the JIC.
- Upon termination of the emergency forward all logs, forms, draft Press Releases, approved Press Releases, completed checklists and other pertinent documentation to the Shift Manager/Emergency Director.

**EXHIBIT 13**

**Press Release Guidance**

- 1.0 Press releases should be issued as soon as possible, typically within one hour from the time that a major plant event has occurred. Press releases shall be written in accordance with the following guidelines:
- a. The following categories of information should be included in press releases.
    - Level of Emergency  
This is simply identifying which of the four emergency levels was declared.
    - Basis for Emergency Declaration  
This should be a simplified description of the plant condition which produced the emergency declaration (e.g., a leak of radioactive water within a plant building).
    - Operations Status of the Plant  
A simple description of the plant status at the time of the emergency declaration (e.g., TMI was operating at 100% power, however, the plant is currently reducing power).
    - Company/Government Interface  
This is intended to inform the public that TMI has notified and is working closely with government officials so that public confidence and company credibility can be increased, or maintained.
    - Corrective Actions  
This should be a non-technical description of what plant personnel are doing to correct the problem. It may include such language as "attempts are being made to stop the leak" or "plant personnel are investigating the cause of the leak."
    - Off-site Impact  
A statement which simply assess what impact this event may have on the environment. This is intended to provide factual information on off-site radiological conditions (e.g., a radioactive release is in progress, however, monitoring teams have not detected any radiation levels in excess of normal background).

The initial press release should include all or part of the above information, however, at the very least, it should contain information through 'Corrective Actions' above.

**EXHIBIT 13**

**Press Release Guidance**

2.0 In addition, the following guidance should be used in issuing press releases:

- a. Speculation, Dose Projections and Protective Action Recommendations should not be included in press releases.
- b. Releases SHALL have the concurrence of the Emergency Director (ED). Press Releases should have Operations, Radiological and, as appropriate, Safeguards review.
  - Exceptions to this are limited to releases that are media advisories or releases that only contain 'boiler plate' information (e.g., level of emergency without any specific details or that the Joint Information Center is now activated).
    - i) The ED should be made aware of these advisories.
  - Original initialed copies are retained for records.
- c. Press releases shall be reviewed promptly to support timely (< 1 hour) issuance.
- d. Press releases should avoid undefined technical terms and abbreviations (e.g., plant names, trip, etc.)
  - Press releases should be written to be as simple as possible. Technical terms should be defined for example, Diesel Generators could be defined as a backup power source.
  - Additional list of Technical terms and alternate words.

Technical Terms

Suggested Definitions

Accountability	The process of accounting for all plant personnel
Auxiliary Building	Building housing support equipment for the Reactor
RMG22 RMG23	A monitor which detects radiation levels inside the Reactor Building
Contaminated	Has loose radioactive material on it, him, her.
Contamination	Loose radioactive material
Containment Building	Building which houses the Reactor or, Reactor Containment Building
Cladding	A metal tube containing the nuclear fuel
Control Rod	A rod which when inserted in a reactor stops the generation of power

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**Press Release Guidance**

<u>Technical Terms</u>	<u>Suggested Definitions</u>
Critical	Sustained Chain Reaction
Diesel Generator	Emergency Power Unit or Back Up Power Source
Fission Products	Radioactive materials made from operating the Reactor.
Fission Product Barriers	Barriers designed to contain the radioactive materials made from operating the Reactor.
Fuel Cladding Failure	Damage to the metal tubes containing the nuclear fuel.
Fuel Pool	Underwater Storage Area for Nuclear Fuel
Grid	Electrical Distribution System
Hot Well	Tank that collects condensed steam.
Loss of Off Site Power	The plant has lost its connection to the Electrical Distribution System
Noble Gas	Radioactive Gas
Penetration	Opening
Plume	Radioactivity released in the air or water
Poison	A material which reduces power in the reactor
PORV	Pressure Relief Valve
Primary System	The system that circulates water through the Reactor to remove heat.
Protected Area	Security Barrier around the plant
Radionuclides	Radioactive material
Reactor Building	Building which houses the Reactor or, Reactor Containment Building
Reactor Building Purge	A means of exchanging air inside the Reactor Building with outside air

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**Press Release Guidance**

Technical Terms

Suggested Definitions

Reactor Trip

Automatic or Manual Shutdown of the Reactor

Reuter Stokes

Off Site Electronic Radiation Monitors

SCRAM

Immediate or Fast Shutdown of the Reactor

Secondary System

Non Nuclear Steam System

Steam Generator

Heat Exchanger where steam is made

Subcritical

No self sustaining chain reaction

Half Life

Time it takes for half of the radioactive material to decay away

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**Site Access Policy for Media during Emergencies**

- 1.0 Providing site access to media personnel during a plant emergency or in the recovery from a plant emergency is typically in the best interest of TMI and the public. However, media access to the site must not impair the response to the emergency.
- 2.0 Responsibility for approving site access rests with the Emergency Support Director, or, if the EOF is not activated, with the Emergency Director. Refer to Section 5 of this exhibit for responsibilities.
- 3.0 For purposes of media access to the site during an emergency, the same industrial safety and security standards and requirements that apply to non-essential employees will be applied to the media.
- 4.0 **Communication Department Responsibilities**
  - a. Requests for media access will be made to the ESD or ED by the Public Information Duty Representative or the Communications Emergency Team Leader.
  - b. Communications will provide the ED/ESD with the number of media to gain site access, areas to be accessed and length of time the media will be there. (Communications will decide the number of media gaining access based on conditions at the time of the emergency. An attempt will be made to gain access for, at a minimum, one representative each from radio, television, and print media.)
  - c. Communications will provide media transportation on and off site.
  - d. Communications will have each member of the media sign a Media Access Briefing Form, indicating they were briefed about the risks as they were known at the time by Company Management.
    - If media access does not involve entry into a posted radiologically controlled area:
      - i) The Communications staff will conduct the sign in and badging of media at TMI.
        - Communications will notify the Security Coordinator prior to proceeding with Site Access.
      - ii) Communications will supervise and escort the media while on site.
      - iii) Communications will conduct a briefing explaining the radiological and industrial conditions and risks on site.

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**Site Access Policy for Media during Emergencies**

- If media access involves entry into a posted radiologically controlled area:
  - i) Media will be processed at the EOF, as appropriate, receiving dosimetry, training, bioassay, waivers and briefings based on established procedural requirements.
    - Communications will notify the Security Coordinator prior to proceeding with Site Access.
  - ii) Communications in conjunction with Radiological Controls will supervise and escort the media while in posted radiologically controlled areas.

**5.0 ED/ESD Responsibilities**

- 5.1 The ED/ESD will consult with the RAC/Group Leader R&EC, and media will be granted access if the projected dose will not exceed the 500 millirem annual limit including external and internal exposure.
- For Security driven events, media access to the site must also be approved by the Local Law Enforcement Agency/Security.
- 5.2 Approve media access to the site, if requirements are met.

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**TMI/NRC Emergency Response Interface Criteria**

This is a synopsis of the NRC emergency response process as it applies to TMI.

Upon arrival of the NRC, the ED/ESD should:

- Verify who is the senior NRC person in charge
- Ask the senior NRC person to inform the ED/ESD when the position of Director Site Operations is assumed and whether the responsibility to issue directives is included.
- Request that the NRC keep TMI informed of all substantive information exchanges between the NRC and the state.
- Request the NRC provide all DIRECTIONS in writing.

In essence, advice or directives from the NRC must come from the NRC Director (typically, the NRC Chairman) or from the NRC Director of Site Operations (typically, the NRC Regional Administrator). Such advice or directive can only be communicated to the Emergency Director (the Emergency Support Director once the EOF is activated). If a directive order is issued by the NRC Director or Director of Site Operations, the ED/ESD should request written confirmation which spells out the specific nature of the directive.

While NRC advice may be challenged by the ED or ESD, directives must be complied with.

With respect to protective action recommendations for the public, the NRC may either endorse the TMI recommendation or opt to recommend a different one. The ED/ESD is encouraged to include the NRC and State representatives in the protective action recommendation discussions in order to arrive at a mutually agreeable recommendation. In the event that the NRC opts to recommend a different recommendation, they will attempt to resolve their differences with the utility prior to making recommendations to the State. Their recommendation, like the utility recommendation, will be considered by the State in the development of a Governor directive.

**SYNOPSIS - NRC EMERGENCY RESPONSE**

Revision 2 to NUREG 0728, supplemented by NUREG-0845 and NUREG-1471, describes the manner in which the NRC will respond to an incident and provides criteria for making preplanned response decisions. They provide procedural guidance, describe the functions related to NRC emergency response and define procedures for responding to the following NRC modes of operation.

1. Normal Mode
2. Standby mode
3. Initial Activation
4. Expanded Activation
5. Deactivation

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**TMI/NRC Emergency Response Interface Criteria**

Each mode defines the scope of NRC activities related to a particular level of emergency response in ascending order of degree of involvement to deactivation. The various modes are characterized as follows:

- Normal mode - Normal activities designed to maintain readiness.
- Standby mode - Regional Office activates the Incident Response Center (IRC) with an appropriate staff and NRC Headquarters Operations Center is staffed by a Standby Team.
- Initial Activation - NRC Operations Center is staffed by a response team, the Regional IRC is fully activated and a Site Team is dispatched under the leadership of the Regional Administrator, normally designated as Director of Site Operations (DSO).
- Expanded Activation - Focus of NRC response operations is shifted to the site. DSO is designated primary spokesman for the NRC and may be empowered with directive authority by the Chairman of the Nuclear Regulatory Commission.
- Deactivation - Follow-up activities (e.g., reviews, investigation and recovery operations).

One particular mode assumed by the NRC will be dependent upon Licensee event classification and "independent NRC perception of relative severity of uncertainty of accident conditions."

NRC functions defined in NUREG 0728 which impact directly on the Licensee are:

- Evaluate Incident and Plant Status  
  
NRC personnel at the site, the Regional Office and the Headquarters will acquire the necessary data to develop and maintain a complete and accurate overview of the evolution and status of the event. This will involve data gathering via ERDS, ENS, HPN, and other FTS 2000 telephones as well as direct communications with the Licensee at the ERF's.
- Evaluate Licensee Actions  
  
NRC personnel will evaluate Licensee actions to mitigate the consequences of the incident and recommendations concerning protective actions for the public.
- Project Incident Consequences and Plant Status  
  
Based on information and evaluations discussed above, the NRC will develop an independent projection of the likely further course of events.

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**TMI/NRC Emergency Response Interface Criteria**

- Advise, Assist or Direct Licensee

The NRC may offer advice or assistance to the Licensee during an emergency, or may respond to Licensee requests for advice or assistance. This may involve diagnosis of critical problems, development of proposed remedial courses of action, and proposals to implement additional precautionary measures. The NRC is also prepared to direct that certain actions be taken if, after thorough discussion with the Emergency Director (the Emergency Support Director once the EOF is activated) it is decided that such direction is required. In the event that such action is taken by the NRC Director or the NRC Director of Site Operations, the ED/ESD should request written confirmation which spells out the specific nature of the directive. Advice or directives will be communicated directly to the ED/ESD from the NRC Director (NRC Chairman) or from the NRC Director of Site Operations (DSO), typically the Regional Administrator, once appointed and empowered to do so.

Several important concepts govern the NRC in providing advice, assistance, or direction. They are:

- The Licensee is at all times responsible for mitigating the consequences of the incident.
- Although the NRC could issue formal orders to the Licensee to take certain measures and to monitor implementation, ". . . licensee continues to make other key operational decisions and to operate and manage the facility . . .".
- The NRC must have a single voice when advising or directing the Licensee.
- The ED/ESD has the option to accept or challenge NRC advice.

At no time will advice or direction come from both the Director and the DSO and the Licensee will always be kept apprised of who is empowered to exercise authority as the NRC spokesman. All other NRC personnel in contact with Licensee personnel are responsible to make clear that discussions should not be construed as advice or direction but rather as a sharing or gathering of information.

- Inform Public and Monitor Public Information

During emergency situations, the NRC will formulate its own press releases based on information gathered from the Licensee and from NRC personnel. Procedures exist to ensure that press releases are approved by one person. That person may be the Regional Administrator, NRC Chairman, or DSO depending on the current NRC mode of operations. NRC draft press releases will normally be shared with the Licensee; however, this does not imply a request for approval by the Licensee. The intent is to identify issues needing clarification prior to release to avoid confusing or misleading the public.

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**TMI/NRC Emergency Response Interface Criteria**

- Recommend Protective Actions for the Public

The NRC responsibility during an emergency, as during normal operations, is to ensure that protection of public health and safety is adequate. One aspect of exercise of this responsibility is to provide protective action recommendations or advice to offsite authorities. This may take the form of an NRC endorsement of a Licensee protective action recommendation or the NRC may opt to recommend additional protective actions. The NRC is not normally involved in the process of recommending Protective Actions. However, they may get involved if a major problem is identified with the protective actions recommended by the licensee or protective actions undertaken by the State or local government. Additionally, NRC involvement may be requested by State or local officials.

- Review, Investigate and Document Response Actions

The scope of this task is not preplanned by the NRC; however, it is apparent that this may require a great deal of interaction between the Licensee and the NRC after-the-fact.

SYNOPSIS - REGION I SUPPLEMENT

The Region I Incident Response Supplement to NUREG 0845 restates many of the concepts of NUREG 0845 in greater detail as they apply specifically to Region I.

Section I - Concept of Operations delineates general duties and responsibilities and describes the NRC modes of operation. Relative to the authority of the DSO, it states:

"The Director of Site Operations (DSO) supervises/manages all NRC personnel and operations at the site, is the NRC spokesperson, represents the NRC in interactions with other agencies and carries out the authority delegated by the Director of the NRC Executive Team (Chairman).

Delegated authority will include one or more of the following:

(a) authority to recommend actions to the Licensee, (b) authority to direct the Licensee to take specified actions, and (c) authority to recommend actions offsite, including protective measures for the public.

The Chairman of the NRC, by memo dated 4/22/80, indicated he may delegate authority to the Regional Administrator as DSO, upon transfer of control of NRC actions and resources to the site, to issue orders to a Licensee during an emergency. It is intended that this authority be used as a last resort to mitigate the emergency conditions only if, in the judgement of the NRC, the Licensee has shown it is incapable of controlling the emergency. This authority is valid only in an emergency when the Regional Administrator (or other senior NRC official) is the DSO and specific authorities have been transferred to him by the Chairman or his designated alternate".

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**TMI/NRC Emergency Response Interface Criteria**

Sections II and III contain detailed procedures specific to Region I and present no new concepts of interest to the Licensee.

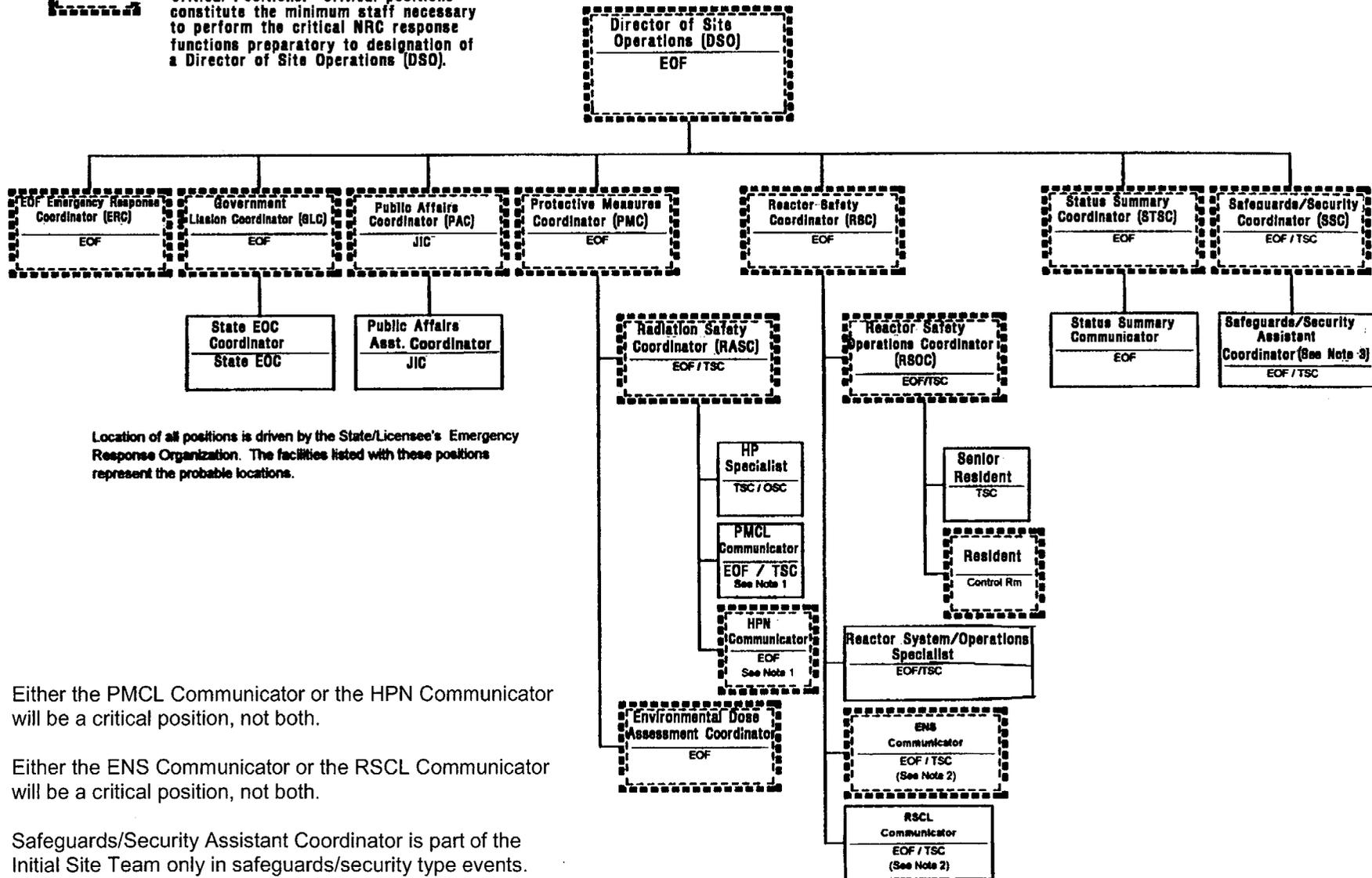
The attachment to the synopsis is provided for your information. This attachment depicts the Site Team Organization and is an extract from NUREG-1471. It defines the number of NRC personnel expected to operate in each facility and shows the lines of communications the NRC expects to use.

EXHIBIT 13

NRC Site Organization - Initial Site Team



Dashed bordered boxes indicate Critical Positions. Critical positions constitute the minimum staff necessary to perform the critical NRC response functions preparatory to designation of a Director of Site Operations (DSO).



Location of all positions is driven by the State/Licensee's Emergency Response Organization. The facilities listed with these positions represent the probable locations.

**NOTE 1:** Either the PMCL Communicator or the HPN Communicator will be a critical position, not both.

**NOTE 2:** Either the ENS Communicator or the RSCL Communicator will be a critical position, not both.

**NOTE 3:** Safeguards/Security Assistant Coordinator is part of the Initial Site Team only in safeguards/security type events.