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December 20, 2001

LIC-01-0130

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

Reference: Docket No. 50-285

SUBJECT: Transmittal of Changes to Emergency Plan Implementing Procedures (EPIP) and Radiological Emergency Response Plan (RERP)

In accordance with 10 CFR 50.54(q), 10 CFR 50, Appendix E, Section V, and 10 CFR 50.4(b)(5), please find EPIP change packages enclosed for the Document Control Desk (holder of Copy 165) and the NRC Emergency Response Coordinator (holder of Copies 154 and 155).

The document update instructions and summary of changes are included on the Confirmation of Transmittal (Form EP-1) form attached to each controlled copy change package. Please return the Confirmation of Transmittal forms by February 1st and 6th, 2002 respectively.

The revised documents included in the enclosed package are:

EPIP Index Page 1 of 2 issued 12/07/01
EPIP-EOF-3 R17 issued 12/07/01
EPIP-EOF-10 R10a issued 01/13/00
EPIP-RR-22A R6 issued 12/07/01
RERP Index Page 1 of 2 issued 12/07/01
RERP-Section N R13 issued 12/07/01

If you have any questions regarding the enclosed changes, please contact Carl Simmons at (402) 533-6430.

Sincerely,

S. K. Gambhir
Division Manager
Nuclear Operations

SKG/ash

A045

Enclosures

- c: T. H. Andrews, Emergency Response Coordinator (2 sets)
- Alan Wang, NRC Project Manager (w/o enclosures)
- W. C. Walker, NRC Senior Resident Inspector (w/o enclosures)
- Winston & Strawn (w/o enclosures)

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Fort Calhoun Station
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EPIP-EOF-3

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EMERGENCY PLAN IMPLEMENTING PROCEDURE

Title: OFFSITE MONITORING

FC-68 Number: Editorial Correction

Reason for Change: Add reference to AR 304478 in coordination with PASS elimination.

Requestor: N/A

Preparer: Mark Reller

OFFSITE MONITORING

NON-SAFETY RELATED

1. PURPOSE

- 1.1 This procedure provides guidance to field teams on performing offsite radiological monitoring.

2. REFERENCES/COMMITMENT DOCUMENTS

- 2.1 RP-418, Operation of the Eberline ESP-1 or ESP-2 Digital Meter
- 2.2 RP-420, Operation of Ludlum and Eberline Count Ratemeters Using External Pancake GM Probes
- 2.3 RP-439, Operation of the Dose Rate Meter
- 2.4 RP-434, Operation of the Radeco Model H-810 Air Totalizer
- 2.5 RP-203, Air Sample Collection and Analysis
- 2.6 FC-EPF-2, Offsite Monitoring Log
- 2.7 FC-EPF-8, Sample Worksheet

3. DEFINITIONS

None

4. PREREQUISITES

None

5. PROCEDURE

5.1 General Field Team Instructions

- 5.1.1 Inform the Field Team Specialist of team location, dose rate surveys, air sample results, and any vehicle or equipment malfunctions.
- 5.1.2 Use ALARA principles in taking samples.
- 5.1.3 When stopping, use the roof-mounted yellow lights, and pull off the road to a safe distance.

- 5.1.4 Exercise care when handling samples to prevent cross-contamination.
- 5.1.5 Be aware of the need for respiratory protection and/or anti-contamination clothing.
- 5.1.6 Operate radiological monitoring equipment in accordance with applicable operating procedures for the equipment (see Section 2).
- 5.1.7 IF radio communications are lost for any reason, THEN contact the Field Team Specialist via another Field Team or commercial telephone.
- 5.1.8 Dosimetry will be assigned by RP Supervision prior to team dispatch. Dosimeters should be read at each sample location or as directed, and the results recorded on EPF-2.

5.2 Equipment and Vehicle Check

- 5.2.1 Proceed to the Security Building Emergency Gear Locker and obtain:

- Vehicle keys (key numbers correspond to the vehicle numbers)
- Survey and monitoring instruments
- Potassium Iodide Tablets (3 bottles)

(✓)

- 5.2.2 At the vehicle, ensure all electrical power cords plugged into the front of the vehicle are unplugged, and perform a quick visual check of the vehicle.

NOTE: Do not depress accelerator pedal prior to starting the vehicle as the engine is fuel injected.

NOTE: Do not attempt to race engine to trip choke off as a computer controls engine speed during warm-up.

- 5.2.3 Start the van.
- 5.2.4 Check the air sampler, calculator, and survey meters for operability. Survey meter operability check includes checking the following: batteries, instrument calibration and response test labels, meter integrity and meter response using the provided button source.
- 5.2.5 Verify radio operability by contacting the TSC or EOF for a radio function check.
 - A. Depress "power" button to power on the radio.
 - B. Select desired subfleet, normally "SF4" using the "mode" control.

- 5.2.5 C. Turn volume control up to desired level using the "volume" control.

NOTE: Handset "push-to-talk" button must be released to listen.

- D. Contact TSC or EOF using "push to talk" button.

- E. Switch to other subfleets only as directed by the Field Team Specialist.

- 5.2.6 Notify the Field Team Specialist if any equipment is missing or faulty.

- 5.2.7 Record the following information on EPF-2:

- A. Team color (Blue or Red);
- B. Serial numbers of survey instruments;
- C. Names of Field Team members;
- D. Initial readings of the team members' pocket dosimeters.

5.3 Team Departure

- 5.3.1 Receive a briefing from the Field Team Specialist on sample location, route, and personal protective actions, if needed.

- 5.3.2 When directed, proceed to the designated sample location using the monitor map book for directions.

5.4 Plume Search

- 5.4.1 Turn on a dose rate meter, periodically monitor and maintain it in operation while in transit to identify trends.

- 5.4.2 If there is an increase in radiation level (i.e. greater than twice background), then report the readings to the Field Team Specialist immediately.

- A. Note the location of the change. Continue plume search as directed by Field Team Specialist.
- B. Note the locations of the highest and lowest level readings.
- C. Recommend to the Field Team Specialist a sample location that represents the center of the dose plateau across the plume or the highest reading across the plume.

- 5.4.3 Note any apparent changes in meteorological conditions (such as wind direction, wind speed, and precipitation) and report them to the Field Team Specialist.
- 5.4.4 Report to the selected sample location(s) to perform surveys as directed by the Field Team Specialist.

5.5 Gamma/Beta Surveys

NOTE: Determine gamma and beta radiation levels using the ion chamber instrument. For backup reasons, the ESP-2 with the HP-270 detector may be used.

NOTE: If in a noble gas field, an ion chamber instrument can become internally contaminated with noble gas and provide erroneous readings.

- 5.5.1 Monitor for both gamma and beta radiation at ground level. Ensure that trees and other obstructions are avoided to give the most accurate data. Record the readings on EPF-2.
- 5.5.2 Monitor for both gamma and beta radiation at waist level. Record the readings on EPF-2.

5.6 Air Sampling

- 5.6.1 Load the air sampler with both a particulate filter and a charcoal cartridge.
 - A. Note the direction of air flow on the cartridge using the arrow, and insert cartridge into sample head properly.
 - B. Note the collection side of the particulate filter with an ink mark.
 - C. Ensure any gaskets are in place and the particulate filter is properly positioned to prevent sampled air to bypass the particulate filter.

NOTE: The air sample should be taken in an open area away from trees, buildings, and other obstructions.

- 5.6.2 Hold the air sampler or place it in a stable position. Do not place the sampler on the ground.
- 5.6.3 Perform air sampling as follows: **[AR 304478]**
 - A. Ensure the power supply switch is in "generator" or "inverter" position if power is to be supplied from vehicle inverter.

- 5.6.3
 - B. Turn on inverter switch (located on the inverter).
 - C. Ensure the power supply switch is in "outside power" position if power is to be supplied from outside power source. Van must be plugged into the power source if this method is used.
 - D. Plug in sampler and operate in accordance with operating procedures, (RP-431 OR RP-434).
 - E. Perform air sampling as per RP-203.
- 5.6.4 Bag the air particulate and iodine samples separately. Clearly label each sample with the following information:
 - A. Date
 - B. Time On/Off
 - C. Location
 - D. Flow Rate
 - E. Sample Volume
 - F. Name of Person Collecting Sample
 - G. Radioactive Material

5.7 Air Sample Counting

- 5.7.1 After taking the requested surveys and/or samples, move to a low background area (i.e. less than or equal to twice background) to analyze the samples.
- 5.7.2 Count the charcoal cartridge for I-131 activity and particulate filter for gross particulate activity. Use EPF-8, for specific instruction on counting samples, and for calculating results. **[AR 304478]**
- 5.7.3 Log the sample results on EPF-2.
- 5.7.4 Return the air particulate and iodine samples to their labeled bags. Seal the bags and place them in the designated storage bin in the vehicle.

5.8 Smear Collection

- 5.8.1 Obtain the desired number of smears for the survey.
- 5.8.2 Smear surfaces as desired using the standard 100 cm² (approximate) smear area.
- 5.8.3 Bag and label the smears with the following information:
 - A. Date/Time
 - B. Location
 - C. Name of person collecting smear
 - D. Radioactive Material

5.9 Smear Counting

- 5.9.1 After taking the requested surveys and samples, move to a low background area (i.e., less than 300 cpm) to analyze the smears.
- 5.9.2 Count the smears for activity in DPM/100cm². Use EPF-8, for specific instruction on counting samples, and for calculating results.
- 5.9.3 Log the highest smear results on EPF-2.
- 5.9.4 Return the smears to their labeled bags. Seal the bags and place them in the designated storage bin in the vehicle.

5.10 Follow-up Actions

- 5.10.1 Perform additional surveys as directed in the vicinity of the same sample location. Log results on the additional spaces of the same EPF-2.
- 5.10.2 When directed to report to another monitor location, repeat applicable portions of Steps 5.4 through 5.10, using a new EPF-2 for each location.
- 5.10.3 If directed to return to the site or the EOF, obtain appropriate directions and location to proceed to. ASSUME vehicle is contaminated.
- 5.10.4 When securing vehicle, turn off power inverter, radios, lights and other accessories as necessary.

- 5.10.5 Request the RP Coordinator (in the OSC) to have appropriate personnel and equipment standing by for return surveys.
- 5.10.6 Upon return to the site (or EOF), survey all team members, the vehicle, and the equipment for contamination. If contamination is found, notify the Radiation Protection Coordinator via the Field Team Specialist.
- 5.10.7 Deliver all samples and logs to the Field Team Specialist.

6. ATTACHMENTS

None

Fort Calhoun Station
Unit No. 1

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EPIP-RR-22A

EMERGENCY PLAN IMPLEMENTING PROCEDURE

Title: CHEMISTRY COORDINATOR ACTIONS

FC-68 Number: EC 28891

Reason for Change: Change reference to "PASS", to "Primary Sample", since PASS is being eliminated.

Requestor: M. Reller

Preparer: M. Reller

CHEMISTRY COORDINATOR ACTIONS

NON SAFETY RELATED

1. PURPOSE

- 1.1 The purpose of this procedure is to provide guidance to the Operations Support Center's Chemistry Coordinator.

2. REFERENCES/COMMITMENT DOCUMENTS

- 2.1 EPIP-OSC-9, Emergency Team Briefings
- 2.2 EPIP-OSC-21, Activation of the Operations Support Center
- 2.3 EPIP-EOF-11, Dosimetry Records, Exposure Extensions, and Habitability

3. DEFINITIONS

None

4. PREREQUISITES

None

5. PROCEDURE

- 5.1 Use the Chemistry Coordinator's Checklist, Attachment 6.1, as an aid to completing required actions.

NOTE: The attached checklist is designed as a reminder of actions which are required to be performed during an emergency condition.

- 5.2 Review the procedure and checklist, and accomplish the applicable steps both upon initial activation and periodically, as required, thereafter.
- 5.3 Retain all documentation (logs, calculation sheets, notes, etc.) generated or used during the emergency. At the termination, deliver all Chemistry Group documentation to the TSC Administrative Logistics position in the TSC.

6. ATTACHMENTS

- 6.1 Chemistry Coordinator's Checklist

(✓) INITIAL/TIME

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Attachment 6.1 - Chemistry Coordinator's Checklist

Page 2 of 2

(✓) INITIAL/TIME

- 4.6 Coordinate administrative exposure limit increases as necessary for the Chemistry Coordinator group per EPIP-EOF-11.

_____ / _____

5. Provide a detailed briefing to your shift relief of any actions taken and the current emergency status.

_____ / _____

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RERP-SECTION N

RADIOLOGICAL EMERGENCY RESPONSE PLAN

Title: EXERCISES AND DRILLS

FC-68 Number: EC 25777

Reason for Change: Revise overview of how H.P., Plant and Environmental liquid sample drills are performed and evaluated. Delete requirement for a liquid (PASS) drill per Tech Spec Amendment 200. Revise Section on critiques to better reflect how the EP department meets and documents those requirements.

Requestor: M. Reller

Preparer: M. Reller

EXERCISES AND DRILLS

1. EXERCISES

An emergency preparedness exercise is an event that tests the integrated capability and a major portion of the basic elements existing within the Radiological Emergency Response Plan (RERP), associated Emergency Plan Implementing Procedures (EPIPs) and the various organizations associated with the implementation of the RERP. Typically, an emergency preparedness exercise shall simulate an emergency that results in offsite radiological releases which would require response by offsite authorities. However, whenever the State of Nebraska and the State of Iowa are not participating in a particular exercise, the scenario should concentrate on realistic in-plant emergencies with less emphasis on offsite response.

Periodic emergency preparedness exercises can be conducted to evaluate major portions of emergency response capabilities. Also, exercises provide the opportunity to identify further improvements to the emergency preparedness program. Areas of improvement, weaknesses and deficiencies noted as a result of an exercise will be evaluated and corrected, as appropriate.

Normally, an exercise is not considered a "training function", as the participants are not guided, nor "coached", during an exercise. Interaction between controller/observers and participants is not allowed during an exercise, except for delivery and explanation of scenario information and data.

Exercises are conducted biennially, as a minimum. The states of Iowa and Nebraska, along with associated local governmental agencies, are invited to participate in all training drills and exercises, and are required to participate in the biennial exercise under evaluation by the Federal Emergency Management Agency. The Nuclear Regulatory Commission also performs routine inspections to evaluate licensee emergency response performance. The Resident Inspector(s) or other NRC personnel may observe licensee performance during training drills or non-evaluated exercises.

Emergency Planning Tests are used to verify the following criteria:

- 1.1 State and local personnel and resources capability to respond to a radiological emergency response scenario.
- 1.2 Scenario variance from year to year in order to provide optimum training for radiological emergency response personnel.
- 1.3 Variance of hours in which the radiological emergency exercise is performed.
- 1.4 Joint radiological emergency exercise involving plant and Federal, State and local support groups, including any that involve a time variance.

2. DRILLS

A drill is a supervised instruction period aimed at testing, developing and maintaining skills in a particular ERO position, function, center, or operation. A drill can be used as a specific training component of an exercise, if the exercise objectives identify and authorize such component. Drills will be supervised and evaluated by appropriate emergency planning personnel or other personnel with specific expertise pertaining to the drill or function being observed.

Periodic emergency preparedness drills are conducted to develop and maintain key skills within the ERO. Also, drills provide the opportunity to identify further improvements to the emergency preparedness program. Areas for improvement, weaknesses and deficiencies noted as a result of a drill will be evaluated and corrected, as appropriate.

At least one drill between biennial exercises will involve a combination of some of the principal functional areas of the onsite Emergency Response Organization, such as; command and control, accident assessment and classification, protective action recommendation decision making, and plant system and component repair and corrective actions. Simultaneous activation of all of the licensee's emergency response facilities during training drills is not necessary. Special functional drills can be developed and used to; focus on accident management strategies; supervised instruction periods for special or newly developed activities and/or procedures; allow resolution of problems (success paths) by ERO members, and; focus on identified onsite training objectives.

Normally, a drill is considered a "training function", as the participants are guided or "coached" during the actual drill. Interaction between controller/observers and participants is encouraged during a drill, except for instances where specific knowledge and memory are being tested.

2.1 Communication Drills

Emergency Planning Tests provide for communication checks with appropriate agencies to ensure availability and operability of all channels of communication necessary for adequate response to a radiological emergency requiring off-site support. These tests outline those agencies to be contacted, the person (by name or title) who is responsible for verifying that adequate communication exists, the required frequency for which communication is to be checked, and a procedure for accomplishing the test. Below is the communication schedule for these checks or drills to be performed:

- 2.1.1 Communications are checked monthly from the EOF at the North Omaha Power Station with the States of Nebraska and Iowa and the local governments of the Counties of Harrison, Pottawattamie, and Washington and the NRC using dedicated communications equipment and backup systems. A functional check of the ERFCS is also performed on a monthly basis.
- 2.1.2 Communications are checked monthly from the Fort Calhoun Station Technical Support Center with the State of Nebraska and Iowa EOCs.
- 2.1.3 Communications are checked quarterly with Federal response agencies and the States of Nebraska and Iowa within the ingestion exposure pathway EPZ. Also verified are communications with the MRC and functional checks of the FAX Network, radio system, and the ERF paging systems. Quarterly communications checks are performed from the Control Room with the NRC using both the FTS-ENS phoneline and the Emergency Response Data System.
- 2.1.4 Communications are checked annually between the Fort Calhoun Station, the States of Nebraska and Iowa and local Emergency Operations Centers and field teams.

2.2 Fire Drills

Fire drills are conducted by plant personnel on a quarterly basis. The drills are held to test the plant's fire fighting capability. The drills are varied in order to test all phases of fire fighting techniques.

The Blair Fire Department is annually invited to conduct a drill onsite. Onsite drills assist in familiarizing the fire department members with the types and locations of equipment available to mitigate plant fires.

2.3 Medical Emergency Drills

The Nebraska Health Center, University Hospital Radiation Health Center is invited to participate in an annual exercise and/or scheduled drill(s) to demonstrate and practice the receipt and treatment of contaminated patients. The extent of the Center's participation depends on their work load and schedule for hospital patients at the time the exercise or drill is declared.

2.4 Health Physics and Radiological Monitoring Drills

Emergency Planning Tests develop guides for the preparation, execution, and documentation of health physics and radiological monitoring drills. Execution of these tests is shared by Emergency Planning and Radiation Protection.

There are two (2) types of drills performed by Chemistry and Radiation Protection Departments:

- 2.4.1 Semi-annually, a health physics drill is conducted to monitor the response to and analysis of simulated elevated airborne releases, and direct radiation measurements in the environment. Normally, this drill is conducted in conjunction with a quarterly training drill.
- 2.4.2 Annually a drill is held which involves the collection of a type of environmental sampling media by the Chemistry Departments Environmental Group.

The NRC waived the requirement for a Reactor Coolant liquid sample drill in the SER related to Technical Specification (T.S.) Amendment 200. Amendment 200 deleted the Post Accident Sampling System (PASS).

2.5 Augmentation Call Out Drill

Notification and/or Augmentation Drills will be conducted at least every 12 months. The drills shall evaluate the licensee's capability to notify the minimum staffing positions in the Technical Support Center, Operations Support Center and the Emergency Operations Facility, in addition to meeting the staffing requirements of Table B-1 in RERP. Section B.

3. SCENARIOS

Scenarios for a drill are developed by either Emergency Planning or the group responsible for conducting the specific drill. Each drill should include a basic objective and appropriate evaluation criteria.

A special group is assigned the scenario development for the biennial exercise. An Emergency Planning Test develops the plan for the preparation, execution, and documentation of the biennial exercise. This test requires input from major Federal, State, and local agencies, as well as OPPD staff, in order to define the objectives to be accomplished in the exercise. The scenario is then prepared to describe the following features:

- 3.1 Objectives of the exercise.
- 3.2 Date, time period, location, and participants.
- 3.3 Simulated events.
- 3.4 Time schedule of real and simulated events.
- 3.5 Summary describing conduct of exercise.

Preparation of the scenario may include such items as identifying Control Room alarms, sequence of alarms, and instrument readings required to initiate the planned emergency exercises essential components.

A strong attempt is made to allow only key officials of Federal, State, and local support agencies to share scenario information in advance of exercises, in order that their participation in the exercise can be developed properly to demonstrate their maximum capabilities without losing confidentiality of exercise information.

4. CRITIQUES

In addition to the OPPD observers, offsite support agencies may provide observers for the biennial exercise. Observers are given information of the accident scenario prior to the exercise so that they may evaluate participants effectively.

Observers, evaluators, controllers and participants submit their comments and recommendations during a critique that is held after all drills and exercises. An Emergency Planning Test is used to document and classify all significant comments and issues. Significant observations are incorporated into the plants Corrective Action Program for resolution.

5. ACTUAL EMERGENCIES

In the event of an actual emergency, credit for the response may be substituted for a drill or exercise if the event is properly documented according to the guidelines set forth in 10 CFR 50.47 and NUREG-0654, Rev.1/FEMA-REP-1.

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Fort Calhoun Station
Unit No. 1

EPIP-EOF-10

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EMERGENCY PLAN IMPLEMENTING PROCEDURE

Title: WAREHOUSE PERSONNEL DECONTAMINATION STATION OPERATION

FC-68 Number: DCR 10955

Reason for Change: Reformat per Writers Guide.

Initiator: Doug Levine

Preparer: Mark Reller

Correction (a): Page 2 (12-04-01)

WAREHOUSE PERSONNEL DECONTAMINATION
STATION OPERATION

NON-SAFETY RELATED

1. PURPOSE

- 1.1 The purpose of this procedure is to provide instructions for operating the Warehouse Personnel Decontamination Station.

2. REFERENCES/COMMITMENT DOCUMENTS

- 2.1 RPI-1, Personnel Monitoring and Decontamination
2.2 FC-RP-207-1, Personnel/Clothing Contamination Report

3. DEFINITIONS

NONE

4. PREREQUISITES

NONE

5. PROCEDURE

- 5.1 Use the Warehouse Decontamination Station Operation Checklist, Attachment 6.1, as an aid to completing required actions.
5.2 Retain all documentation (logs, calculation sheets, notes, etc.) generated or used during the emergency. At the termination, deliver all documentation to the Administrative Logistics position in the TSC.

6. ATTACHMENTS

- 6.1 Warehouse Decontamination Station Operation Checklist
6.2 Warehouse Personnel Decontamination Station Layout

Attachment 6.1 - Warehouse Decontamination Station Operation Checklist

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INITIALS

1. Set up a frisking station near the entrance to the Decontamination Showers (see Attachment 6.2). _____
2. Set up a frisking station at the exit of the Women's Decontamination Shower. _____
- NOTE:** Set up the Men's Decontamination Shower only if there is a large number of personnel to be decontaminated.
3. Set up a frisking station at the exit of the Men's Decontamination Shower. _____
4. Verify that the Holding Tank Alert Alarm System Box is plugged into the wall receptacle below the box. (ALARM BOX on Attachment 6.2) _____
5. Test the Holding Tank Alert Alarm System by momentarily depressing the Alarm test button. _____
6. Verify the Submersible Pump SD-13 controller is in the "OFF" position. (CONTROLLER on Attachment 6.2) _____
7. Verify that Breaker No. 13 in MPP-41-2 is in the "OFF" position. _____
8. Verify that the Submersible Discharge Valve SD-106 operator, located outside the warehouse and a few feet to the west of the Holding Tank Manway, is "LOCKED SHUT". _____
9. Survey personnel reporting to the Decontamination area in accordance with RP procedures. _____

NOTE: Periodically survey area to confirm contamination control.

9.1 If contaminated:

- 9.1.1 Direct the person into the undressing area
- 9.1.2 Follow the direction of Radiation Protection Procedures to decontaminate the individual.

Attachment 6.1 (continued)

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9.2 If not contaminated, direct individual to continue Site Evacuation.

10. If/When the High Level Alarm in the Holding Tank sounds:

NOTE: If personnel decontamination is still required, the Radiation Protection Coordinator and Site Director should consider using the decontamination shower in the Auxiliary Building or weigh the risk of delaying personnel decontamination against pumping the Holding Tank.

10.1 Secure the decontamination showers and sinks.

NOTE: The Holding Tank contents can be pumped out only with an approved release permit. The Radiation Protection Coordinator should request a portable tank and pumping equipment if the contents cannot be released.

10.2 Contact the Radiation Protection Coordinator in the OSC:

10.2.1 Report the alarm.

10.2.2 Report the status of personnel decontamination.

10.2.3 Request that the Chemistry Coordinator be contacted to have the tank sampled and a release permit prepared.

11. Following use, survey and decontaminate the Decontamination Station in accordance with Radiation Protection Procedures.

12. If the showers or sinks were used, post signs indicating that the Holding Tank and associated piping is potentially contaminated.

Attachment 6.2 - Warehouse Personnel Decontamination Station Layout

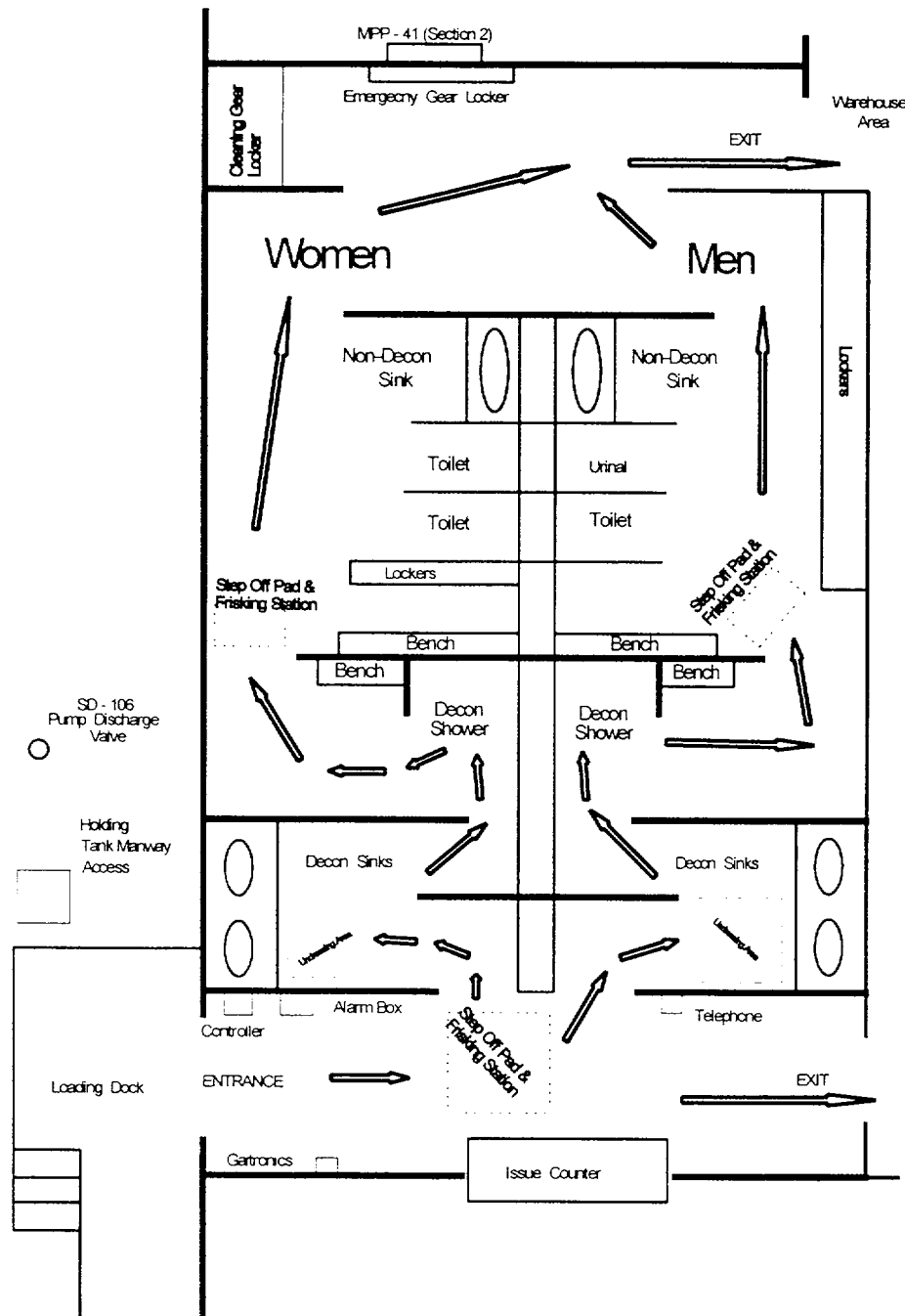


Figure 1 {EOF-10.WPG}