FENOC

FirstEnergy Nuclear Operating Company

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

April 6, 2002
PY-CEI/NRR- 2629L

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

Perry Nuclear Power Plant
Docket No. 50-440
Submittal of Emergency Plan
Implementing Instructions

Gentlemen:

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

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

Very truly yours,

Dan Clearwater for Vernon Higaki

Vernon K. Higaki, Supervisor
Emergency Planning Unit

VKH:byr

Enclosure

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

A045

FirstEnergy Nuclear Operating Company

PERRY NUCLEAR POWER PLANT

UNIT 1 & 2

ACKNOWLEDGMENT OF RECEIPT

Title Emergency Plan's Implementing Procedures for the Perry Nuclear Power Plant (EPIs), EPI-A8 Rev. 9, C-4 / EPI-B8 Rev. 8, C-5 / EPI-B-5 Rev. 6, C-7

Control No. 60

Letter No./Date PY-CEI/NRR-2629L / April 6, 2002

_____ _____

Signature Date

_____

Title

Return to:

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

FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant

Controlled Document Instruction Sheet

Manual: Emergency Plan Implementing Procedures for Perry Nuclear Power Plant (EPI), **EPI-A8 Rev. 9, C-4**

Control Number 60

Remove the pages listed below and insert enclosed pages:

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

The Cleveland Electric Illuminating Company

PERRY OPERATIONS MANUAL

PNPP
[redacted]
CONTROLLED COPY
No [redacted]

Emergency Plan Implementing Instruction

INFORMATION ONLY

TITLE: EMERGENCY OPERATIONS FACILITY ACTIVATION

REVISION: 9 EFFECTIVE DATE: 3-20-95

PREPARED: Joseph D. Anderson 11-23-94
Date

EFFECTIVE PIC's

PIC No.	Type of Change	Effective Date
1	Intent	5-29-96
2	Intent	7-10-97
3	Admin	4-4-01
4	Admin	3-18-02

EMERGENCY OPERATIONS FACILITY ACTIVATION

Table of Contents

SCOPE OF REVISION:

Rev. 9 -
1. Removes actions for Information Liaison and Access Controller which are governed under EPIOIM and SPI-0023 respectively.
2. Changes title of Governmental Liaison to Regulatory Affairs Coordinator, and expands responsibilities and actions. Eliminated EOF Manager action to contact.
3. Identifies the Environmental Liaison as responsible individual for coordinating RMT activities.
4. Statement inserted under Emergency Coord. regarding the tracking and input into ERO in-plant priorities.
5. Statement inserted under Emergency Coord. regarding the referral of incoming calls from Federal, State, and local agencies to the Regulatory Affairs Coordinator.
6. Reworded/restructured instruction text and activation checklist to address ERO comments from 1994 drill/exercise cycle.

Change History

PIC Number: 1 Affected Pages: 1, 2, 5, 5a, 6, 7, 8, 9, 10, 13, 18, 19, 21, 22

Summary of Change:
1. Revised to address unscheduled PORC per PAP-0103.
2. Revision of EOF Activation Checklist and "activation" actions for the Emergency Coordinator and EOF Manager to streamline actions, specify minimum staffing required to declare the EOF operational, clarify goal for declaring the EOF operational, and to separate actions for declaring the EOF operational and for the transferring of Emergency Coordinator duties.
3. Deleted reference to specific survey form (too restrictive).
4. Revised Regulatory Affairs Coordinator actions to address comments from 1995 drill/exercises.

PIC Number: 2 Affected Pages: i, iii, 13, 26

Summary of Change:
1. Updates Portal Monitor Response Check (Attachment 4) to reflect monitor conversion to Gamma 60.

PIC Number: 3 Affected Pages: i, iii, 1, 2, 4, 5, 6, 8, 9, 10, 11, 12, 13, 14, 16, 17, 20, 21, 22

Summary of Change:
1. Replaced reference to PAP-0514 with HPI-B0003.
2. Deletes reference to EPI's A3, -A4 and A5 which were consolidated into and superseded by EPI-A2.
3. Changed reference from SOC to SCC and corrected telephone number.
4. Revised the Help Desk number from 43279 to 825-3700.
5. Changed reference from CEI to FirstEnergy.
6. Deleted CAPCO reference.
7. Replaced the Emergency Response Information System (ERIS) with Integrated Computer System (ICS).
8. Health Physics and HP were replaced with Radiation Protection and RP as appropriate. CRRA-00-1159-001 with a 12/14/00 due date mandates these changes.

PIC Number: 4 Affected Pages: i, iii, 1, 6, 11, 12, 17, 21, 22, 23, 24

Summary of Change:
1. Changed Operations Staff position titles to match FENOC titles.
2 Updated the EOF HVAC Emergency Isolation Checklist bringing it up to date with the recent installation of the HVAC system.
3. Updated the Help Desk Telephone number.
4. Updated the System Control Center Telephone number.

EMERGENCY OPERATIONS FACILITY ACTIVATION

1.0 PURPOSE

This instruction describes the activation and operation of the Emergency Operations Facility (EOF), and delineates the responsibilities of designated EOF personnel.

The EOF will be activated for a Site Area Emergency or General Emergency, or at the discretion of the Shift Manager or Technical Support Center (TSC) Operations Manager, serving as Emergency Coordinator.

2.0 REFERENCES

2.1 Source References:

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

2.2 Use References:

1. Emergency Plan Implementing Instruction (EPI) A2: "Emergency Actions Based On Event Classification"
2. Security Post Instruction (SPI) 0023: "Instructions for Personnel Accountability and Site Evacuation"
3. Emergency Plan Implementing Instruction (EPI) B8: "Protective Actions and Guides"
4. Plant Administrative Procedure (PAP) 0103: "Plant Operations Review Committee"
5. Emergency Plan Implementing Instruction (EPI) B9: "Emergency Records"
6. Emergency Response Telephone Directory
7. Emergency Plan Implementing Instruction (EPI) B1: "Emergency Notification System"
8. Preparedness Support Instruction (PSI) 0007: "Reporting Emergency Plan-Related Communication Equipment Problems"
9. Emergency Plan Implementing Instruction (EPI) B7a: "Automated Offsite Dose Calculations"

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

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

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

13. Health Physics Instruction (HPI) B0003: "Processing Of Personnel Dosimetry"

14. Emergency Plan Implementing Instruction (EPI) B10: "Emergency Radiological Environmental Monitoring Program"

15. Emergency Public Information Organization Instructions Manual (EPIOIM)

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

17. Emergency Plan Implementing Instruction (EPI) A1: "Emergency Action Levels"

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

19. Emergency Plan Implementing Instruction (EPI) A11: "Activation of the Backup Emergency Operations Facility"

20. Commitments addressed in this document:

B00626	P00048	P00052
L01314	P00049	P00059
P00042	P00050	

3.0 DEFINITIONS

3.1 Activation/Activate

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

3.2 Operational

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

4.0 RESPONSIBILITIES

4.1 Emergency Coordinator

1. Coordinate the overall activities of the Perry Plant Emergency Response Organization (ERO).

2. Assume the duties and responsibilities of the Emergency Coordinator from the TSC Operations Manager once the EOF is operational.

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

4. Assist the Operations Manager in the TSC in coordinating onsite emergency response effort.

5. Provide corporate, management-level, policy decisions necessary to support emergency operations.

6. Interface with senior levels of offsite government and support agencies.

7. Apprise Corporate management of emergency response activities.

8. Ensure timely and accurate information is provided to the Emergency Public Information Organization.

9. Direct the activation of the Back-Up Emergency Operations Facility (BEOF) if necessary.

4.2 EOF Manager

1. Coordinate the activation and manning of the EOF in support of the Emergency Coordinator.

2. Direct EOF support staff in support of other key EOF positions to ensure the proper and efficient operation of the EOF.

3. Direct the EOF communicators as necessary to ensure the efficient transfer of information from and to the EOF.

4. Coordinate the augmentation and relief of the EOF staff.

5. Arrange and obtain necessary Company/Corporate or other offsite resources as requested.

6. Coordinate personnel access and accountability in the EOF.

7. Arrange for food and lodging of emergency response personnel.

4.3 **Offsite Radiation Advisor**

1. Oversee Radiation Monitoring Team (RMT) operations coordinated by the EOF Environmental Liaison.

2. Direct the performance of offsite dose projections and development of protective actions recommendations for the general public through the Lead Dose Assessor. <P00048>

3. Direct continuing offsite radiological assessment activities, including environmental monitoring/sampling.

4. Coordinate the monitoring of area and airborne radiation levels in the EOF and personnel entering the EOF for contamination.

4.4 **Plant Operations Advisor**

1. Provide the Emergency Coordinator with an operational insight of the emergency event and interpret plant design and system operation issues when required.

2. Assist the Regulatory Affairs Coordinator in briefing Federal, State and local County officials present in the EOF on operational and technical aspects of the emergency event.

3. Assist the Offsite Radiation Advisor in accurately determining the duration of an offsite release.

4.5 **Regulatory Affairs Coordinator**

1. Act as a liaison between the Perry Plant ERO and Federal, State of Ohio and local county officials present in the EOF.

2. Serve as a source of plant and event information for FirstEnergy Liaisons located at the State and local county Emergency Operations Centers (EOCs).

3. Oversee telephone communications with Federal, State and local counties, outside of formal notifications performed in accordance with <EPI-B1>.

4.6 **Information Liaison**

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

4.7 **Access Controller**

1. Control access to the EOF to maintain personnel accountability within the facility per <SPI-0023>.

2. Issue dosimetry to the EOF staff members per <EPI-B11>.

5.0 ACTIONS

5.1 **Emergency Coordinator**

5.1.1 Activation:

1. Direct the EOF Manager, to coordinate the activation of the EOF using the EOF Activation Checklist (PNPP No. 7988, Attachment 1).

   a. If a qualified EOF Manager is not yet present in the EOF, appoint an interim EOF Manager from available personnel.

Goal for declaring the EOF operational is 90 minutes: 15 minutes for ERO notifications; 60 minutes response time when notified; plus 15 minutes to bring facility to an operational status.

2. Contact the TSC Operations Manager to become apprised of the current plant status, any transient conditions and emergency actions underway. <P00049>

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

4. Periodically, assess personnel staffing levels, through the EOF Manager, to determine if the following minimum staffing exists to declare the EOF operational:

   - Emergency Coordinator
   - Plant Operations Advisor
   - Offsite Radiation Advisor
   - Dose Assessor #1
   - Regulatory Affairs Coordinator
   - EOF Manager
   - "5-Way" Communicator
   - ENS Communicator
   - RMT Communicator

a. If the arrival of a required EOF staff member is delayed, appoint another EOF staff member to cover that position on an interim basis.

b. Direct the EOF Manager to track the arrival of qualified personnel for the following positions which can be manned after the EOF is declared operational: C-1

- Plant Operations Assistant
- Environmental Liaison
- Dose Assessor #2
- HPN Communicator
- Information Liaison
- Support Staff (4)

5. When minimum staffing requirements are met, perform the following steps to declare the EOF operational, using the EOF Activation Checklist:

   a. Use the Intra-Facility PA to brief EOF staff on current plant status, emergency and actions underway, Control Room needs, and TSC priorities.

   b. Announce over the Plant PA System that "the EOF is OPERATIONAL". Record the EOF declared OPERATIONAL in logbook.

   c. Inform the TSC Operations Manager and Shift Manager that the EOF is now OPERATIONAL, and establish when the following Emergency Coordinator duties will be transferred to the EOF:

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

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

      1) Notify the EOF Manager prior to assuming offsite notification responsibilities.

      2) Notify the Offsite Radiation Advisor prior to assuming responsibility for offsite PARs.

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

   e. Review and sign EOF Activation Checklist.

5.1.2 Operation:

1. Perform the actions of the Emergency Coordinator as outlined in <EPI-A2>, which include:

   - approval of offsite notifications per <EPI-B1>;

   - approval of offsite protective actions for the general public per <EPI-B8>; and

   - approval of decision to reclassify or terminate the event, or enter into Recovery per <EPI-A1>.

2. Coordinate the overall activities of the ERO to stabilize and reduce the severity of the emergency, and to minimize radiological exposure to the general public.

> The Operations Manager will maintain control of onsite activities under the direction of the Emergency Coordinator. <P00050>

3. Commit or obtain approval to commit Company/Corporate and Central Area Power Coordination Organization (CAPCO) resources as necessary to support emergency efforts.

   a. Utilize available plant management, not presently assigned an ERO duty, to effectively update and interface with Company/Corporate management.

4. Keep apprised of ERO in-plant priorities established by the TSC Operations Manager, and ensure that priorities reflect concerns of Federal, State and local agencies in regards to preventing or mitigating the consequences of an offsite radiological release.

5. Ensure that Federal, State and local County officials in the EOF are adequately briefed on past, current and proposed plant actions.

6. Perform periodic briefings to Federal and State officials at the request of the Regulatory Affairs Coordinator, or local county commissioners as necessary, to explain or resolve questions over the implementation of protective actions or any plant actions being taken by the Perry Plant to control and mitigate the event.

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

7. Ensure that the Information Liaison is kept informed of plant conditions and emergency actions underway and that all inquiries from the PIRT or JPIC are answered.

8. Approve Company news statements prior to release to the media. C-1

9. Direct the TSC Operations Manager to establish a Plant Operations Review Committee (PORC) quorum for an unscheduled meeting per <PAP-0103>, if deemed necessary, to address issues/changes requiring PORC review. C-1

10. Approve the use of potassium iodide (KI) for RMT personnel per <EPI-B8> based on the Offsite Radiation Advisor's recommendation.

Responsibility for approving KI use for plant personnel, including EOF staff, remains with the TSC Operations Manager.

11. When deemed appropriate, relax EOF access and dosimetry requirements based on the recommendation of the EOF Manager and Offsite Radiation Advisor (ORA).

12. Authorize the EOF Manager to develop and initiate a relief rotation for EOF staff and RMT personnel.

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

13. Direct the activation of the BEOF in accordance with <EPI-A11> if, at some time the EOF is not capable of performing its designated function or becomes inaccessible due to an offsite release.

14. Inform the EOF Manager when/if responsibility for making offsite notifications is to be transferred back to the TSC or Control Room.

15. Direct the collection of event records per <EPI-B9> and demobilization of the EOF staff upon termination of the event or activation of the BEOF.

5.2 EOF Manager

5.2.1 Activation:

1. Track the arrival of EOF staff and coordinate the manning of the EOF using the EOF Activation Checklist; periodically brief the Emergency Coordinator on EOF staffing levels.

Once notified, initiate the callout process for Communicators and Support Staff, upon arriving at EOF if onsite or prior to your departure from home, by contacting one (1) Communicator and one (1) clerical member and directing them to conduct further callouts.

2. Assess the personnel resources available at TEC 110/111, and assign communicators and clerical personnel to the following duties as they become available.

   a. Communicators:

      - ("5-Way") State and Local County Ringdown
      - NRC Emergency Notification System (ENS) Circuit
      - FirstEnergy 800 MHz (RMT) Radio
      - *NRC Health Physics Network (HPN) Circuit

   b. Support (Clerical) Staff:

      - *Emergency Coordinator's Log.
      - *Plant Technical Data Board.
      - *Meteorology/Protective Action Status Boards (FirstEnergy Room only).
      - *EOF Clerk/Messenger (Xerox, telecopier, etc.).

* Position does not have to be manned to declare EOF operational.

3. Initiate callouts for additional communicators first, then clerical staff, as necessary using the <Emergency Response Telephone Directory>.

4. Isolate the EOF Ventilation System, using the EOF HVAC Emergency Isolation Checklist (PNPP No. 8055, Attachment 2), if informed that a radiation hazard to the EOF exists.

5. Synchronize facility wall clocks in the FirstEnergy Office, Display Room, NRC/PIRT Room, and at the Access Point with Integrated Computer System (ICS).

This action shall <u>not</u> delay declaring EOF operational.

6. Relocate copier from TEC Library into EOF FirstEnergy Room office, using door key located in EOF keybox.

7. Direct the set-up of TEC110/111, as required to support EOF staff, using phones located in FirstEnergy Room E-Plan Locker.

8. Submit the EOF Activation Checklist to the Emergency Coordinator for review and approval, once minimum staffing has been met and equipment checks performed.

9. Inform the EOF Communicators when the EOF has assumed responsibility for making offsite notifications to the NRC, State of Ohio, and local Counties.

5.2.2 Operation:

1. Coordinate the drafting, review/approval, and transmission of initial and follow-up notification to the Nuclear Regulatory Commission (NRC), State of Ohio, and local counties per <EPI-B1>.

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

Requests to INPO for technical assistance will continue to originate from the TSC, with the TSC Plant Technical Engineer serving as the point of contact.

3. Conduct telephone callouts for additional EOF Communicators and support staff using the <Emergency Response Telephone Directory>, if required, and assign to the duties listed in Section 5.2.1.2 as they become available.

4. Provide administrative support to the Regulatory Affairs Coordinator and Federal, State and local officials in the EOF, as needed.

5. Arrange and obtain any Company/Corporate or other offsite resources as directed.

6. Resolve any conflicts concerning personnel access to the EOF.

7. Inform the Offsite Radiation Advisor of any requests made over the ENS Circuit to open the NRC HPN circuit; ensure a Communicator has been assigned to the HPN phone in the EOF and at the TSC.

8. When informed that the NRC Regional Site Team will be responding to the Perry Plant, perform the following:

   a. Ensure that the Emergency Coordinator and Regulatory Affairs Coordinator are aware of the team's pending arrival.

   b. Notify the PIRT Manager in the NRC Office, if the PIRT is still in operation, that the NRC Site Team has been dispatched and its estimate time of arrival.

   c. Contact the System Control Center (SCC) Dispatcher at Ext. 8-824-7400 to place the appropriate personnel <u>on standby</u> to support the installation of NRC radio equipment onsite upon the Site Team's arrival.

9. When informed that a radiation or airborne radiation hazard exists, external to the EOF, isolate the EOF Ventilation System using EOF HVAC Emergency Isolation Checklist.

   a. If EOF temperature in one or more rooms increases or can not be maintained at an acceptable temperature, verify that the ceiling vents are open and baseboard heaters are off in the room(s) in question.

   b. If temperature continues to increase, place the Standby Air Handling Unit in service in accordance with Step 6 on EOF HVAC Emergency Isolation Checklist.

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

11. Utilize telecopiers, photo copiers (Xerox), and aperture card readers located in the 1st floor Simulator Offices or on the 2nd floor of the Training Center if mechanical problems arise.

12. Report problems in accessing the Perry VAX to the Help Desk at extension 8-825-3700.

13. Coordinate the relief of EOF staff and RMT personnel at the direction of the Emergency Coordinator by performing the following:

    a. Determine EOF relief personnel needs from key EOF positions, and submit roster to Emergency Coordinator for review and approval.

    b. Request that the ORA determine whether relief personnel should be directed to report to the Perry Plant site or an offsite Company location.

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

    c. Direct available Communicators and support staff to contact required EOF relief personnel utilizing the <Emergency Response Telephone Directory>.

    d. Keep the Emergency Coordinator informed of the status of staff relief efforts.

14. Upon deactivation of the EOF perform the following:

    a. Return EOF HVAC to its normal operating mode.

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

    c. Clean-up of the EOF.

    d. Dismiss facility communicators and support staff.

5.3 Offsite Radiation Advisor

5.3.1 Activation:

1. Identify qualified Dose Assessors and an Environmental Liaison from personnel available in the OSC or reporting to EOF Display Room and TEC110/111 as part of personnel accountability.

2. Contact additional personnel utilizing the <Emergency Response Telephone Directory> to ensure a minimum of two (2) Dose Assessors and an Environmental Liaison are available.

During an off-hour activation, an effort should be made to initiate the callout process, prior to your departure to the EOF from home, by contacting one (1) Dose Assessor and directing him to conduct further callouts.

3. Contact the TSC Radiation Protection Coordinator (RPC) to request Radiation Protection (RP) support for facility radiation monitoring and dosimetry issue activities at the EOF.

4. Assign a Lead Dose Assessor to coordinate performance of the following:

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

   b. Ensure that the EOF radiation and airborne monitors are operable per <SOI-D19>.

      1) If either the EOF area or airborne radiation monitors are out of service, direct the HP technician assigned to the EOF to initiate periodic monitoring of EOF habitability.

Ensure the results of any habitability survey are properly documented.

   c. Ensure that the portal radiation monitor at the Access Point is operational per Attachment 4, or establish a radiological Control Point for personnel contamination monitoring at the EOF access using EOF Access Control Point Set-Up (Attachment 3). <L01314>

   d. Ensure that an RMT Communicator has been assigned by the EOF Manager.

e. Contact the TSC Dose Assessment Area to become apprised of current radiological conditions, protective actions (both recommended and implemented), and the status of the RMTs.

f. Coordinate the formation of a third RMT and upcoming transfer of RMT activities to the EOF with the Environmental Liaison per <EPI-B3>. <P00042, P00059>

g. Brief Dose Assessors on current radiological conditions and assessment activities being performed by the TSC, and prepare for the pending transfer of dose assessment activities to the EOF.

The EOF shall NOT assume responsibility from the TSC for dose assessment and RMT activities until authorized by the Emergency Coordinator.

h. Update radiological and meteorological statusboards in the Display Room.

i. Establish an open HPN line, using Communicator assigned by the EOF Manager, and assume responsibility from the TSC for updating the NRC or offsite dose assessment and radiological release matters.

The TSC will continue to interface with the NRC regarding plant health physics matters.

5. Direct that the Lead Dose Assessor notifies you immediately when ready to accept assessment and plume tracking responsibilities from the TSC.

6. Update the meteorological and protective action status boards in the FirstEnergy Room, and request the EOF Manager to assign support staff member to maintain these status boards.

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

7. Inform the EOF Manager when your personnel and equipment are available to support EOF operation.

5.3.2 Operation:

1. When authorized by the Emergency Coordinator, notify the TSC RPC and direct the Lead Dose Assessor to assume control of the RMTs and responsibility for dose assessment activities.

2. Ensure dosimetry is issued to EOF staff per <EPI-B11> and coordinate with the TSC in obtaining additional dosimetry in support of RMT and EOF staff relief or augmentation.

3. Direct the Lead Dose Assessor to coordinate the following:

   a. Perform offsite dose calculations per <EPI-B7a> and <EPI-B7b> to evaluate the impact to the general public of an actual or potential release to the environment.

   b. Develop protective action recommendations (PARs) for the general public in accordance with <EPI-B8>, based on plant conditions and dose assessments performed.

   c. If warranted, request a post accident coolant or grab sample through the TSC Radiation Protection Coordinator.

4. Direct the Environmental Liaison to perform the following:

   a. Coordinate with the Lead Dose Assessor in directing RMTs to track, confirm, and assess a release from the Perry Plant per <EPI-B3>.

   b. Utilize RMT and dose projection data to develop a deposition "footprint" of any radiological release for the collection of environmental samples.

5. Review and recommend PARs for the general public to the Emergency Coordinator for approval.

6. Assist the EOF Manager in completing applicable portions of the Initial Notification form (PNPP No. 7794) and Follow-up Notification form (PNPP No. 7795) per <EPI-B1>.

   a. Use Block #8 on the Follow-Up Notification form to indicate whether an elevated release has or is occurring, and to designate if Page 2 of 2 of form is required to provide supplemental release data.

Page 2 of 2 on the Follow-Up Notification form can be completed manually by the Dose Assessor or automatically generated by CADAP using <EPI-B7a>.

7. Recommend the use of potassium iodine (KI) by RMT personnel to the Emergency Coordinator for approval per <EPI-B8>.

8. Request emergency exposure limit extensions through the TSC RPC for RMT personnel per <HPI-B0003 >.

9. When notified by the NRC to maintain an open HPN line after the EOF is operational, perform the following: <B00626>

   a. Direct the Lead Dose Assessor to establish an open HPN line in the Display Room.

   b. Notify the TSC Radiation Protection Coordinator.

   c. Assume responsibility from the TSC for interfacing with the NRC on dose assessment matters only.

10. Ensure that the Meteorology/Protective Action, Plant Technical Data, and Radiological Data statusboards in both the FirstEnergy and Display Rooms are kept updated.

11. Verify or coordinate determination of reactor shutdown time and/or release duration with the Plant Operations Advisor, if needed.

12. Periodically apprise the Emergency Coordinator of dose assessment and plume tracking activities as well as radiological conditions in the EOF.

13. Provide plant radiological and meteorological information, as requested, as well as dose projections and protective action calculation results to representatives from the State of Ohio and the NRC Site Team present in the EOF.

14. Periodically check radiation levels on both the EOF area and airborne monitors.

    a. If area or airborne radiation readings exceed normal levels, direct the EOF Manager to isolate the EOF Ventilation System; consider recommending the evacuation of any unnecessary EOF support personnel and issuance of high range dosimetry per <EPI-B11>; and direct the RP technician present to initiate periodic habitability surveys.

Consideration should be given towards the activation of the BEOF if radiation levels become of concern in the EOF or restricted access to the EOF due to external radiation level prevent the effective operation of the facility.

    b. If either monitor becomes out of service, direct the RP technician present in the EOF to initiate periodic monitoring of EOF habitability.

15. When required, direct the Environmental Liaison to coordinate the collection, packaging and shipment of environmental samples per <EPI-B10>.

16. Provide instructions to EOF staff and RMTs on the collection and processing of dosimetry as part of staff relief or facility deactivation.

5.4 Plant Operations Advisor

5.4.1 Activation:

1. Contact the Unit Supervisor or at least one (1) Reactor Operator from the training shift Control Room crew to serve as Plant Operations Assistant.

2. Contact the Operations Advisor to become apprised of current or expected plant conditions, emergency actions, ERO in-plant priorities, and Control Room operations underway.

3. Check to ensure the ICS and associated graphic printer is operable.

4. Update the Plant Technical Data Statusboard, and request from the EOF Manager that a support staff member be assigned to maintain this statusboard.

5. Direct the Plant Operations Assistant, upon his arrival, to:

   a. Provide updates to the Plant Technical Data Statusboard keeper, and instruct on how and when to update board (Ref.: ICS Screen #157).

   b. Resolve any questions or discrepancies regarding statusboard data.

   c. Monitor plant system and fission product barrier status using ICS.

   d. Assist the Dose Assessors, when requested, in determining core state, release pathway, time of shutdown, and release duration for an on-going or potential radiological release. <P00048>

   e. Support operational duties of the Plant Operations Advisor listed in Section 5.4.2.

6. Inform the EOF Manager when your personnel and equipment are available to support EOF operation.

7. Brief the Emergency Coordinator on plant conditions and emergency actions underway to mitigate and/or terminate the event.

5.4.2 Operation:

1. Apprise EOF staff on plant conditions, integrity of fission product barriers, and emergency action taken or being considered by the TSC and Control Room.

2. Provide an operational insight, and interpret plant design and system operation issues for the Emergency Coordinator.

3. Assist the Regulatory Affairs Coordinator, when requested, in clarifying operational and technical aspects of the event to Federal, State and local counties officials in the EOF.

4. Assist the ORA and Dose Assessors in the performance of offsite dose and protective action calculations.

5. Ensure that the Plant Technical Data Statusboard is kept updated by the Plant Operations Assistant.

6. Direct the Plant Operation Assistant's (POA) activities as required to ensure that the above actions are addressed in a timely accurate and thorough manner. <P00052>

5.5 <u>Regulatory Affairs Coordinator</u>

5.5.1 Second Regulatory Affairs Coordinator (Reporting to EOF Prior to Activation):

1. Obtain a briefing from the TSC (on-call) Regulatory Affairs Coordinator on plant status and emergency events, then report to the EOF.

2. Upon the arrival of the State/local county representative(s), perform the following:

   a. Identify the designated work areas in the EOF.

   b. Provide an overview of plant conditions, event status and prognosis, and ERO priorities.

3. Arrange "Escorted Visitor" access to the TSC through the TSC Security Coordinator, if deemed appropriate, to keep individuals apprised of events.

4. If offsite interest in the event justifies, recommend to the TSC Operations Manager the activation of the EOF.

5.5.2 EOF Operational:

Once the EOF is declared operational, the TSC (on-call) Regulatory Affairs Coordinator (RAC) will relocate to the EOF. The On-Call EPU Representative, when available, can also be used to support RAC duties. C-1

1. Direct the "5-Way" Communicator to announce over the circuit when the EOF is operational and request that Lake County open the EOF drop off the State/County Executive Discussion Line (EDL). C-1

2. Provide a preliminary update on changing event and protective action recommendation status, or significant changes in plant conditions over the EDL, as a supplement to <EPI-B1> notifications, and respond to questions and inquiries for State/local county Executive Group members. C-1

3. When notified by the access controller of the arrival at the EOF of government officials, perform the following:

   a. Authorize access for any individuals not listed on the EOF Access List and obtain plant dosimetry.

   b. Direct the individual(s) to the State/Local Room or NRC Office for an initial briefing.

   c. Provide a briefing on plant conditions, event, ERO in-plant priorities, and major emergency actions being planned or underway.

   d. Discuss the layout of the EOF, including personnel staffing, the location and operation of facility equipment.

   e. Provide the Federal, State and local county liaisons with copies of previously communicated initial and follow-up notification forms, and any other requested information.

(INTENTIONALLY BLANK)

f. Assist these individuals in becoming familiar with EOF operations and staffing, and their designated work area(s).

State Representative	-	FirstEnergy Room (State desk)
County Liaisons	-	State/County Office
NRC Site Team	-	NRC Office and counterpart seating in FirstEnergy and Display Rooms.

Government officials should be given unlimited access to EOF work areas; however, the Regulatory Affairs Coordinator should assist these officials as necessary to prevent them from interfering with the duties being performed by EOF staff members.

3. Provide periodic updates to Federal, State and local county representatives in the EOF; ensure representatives are included in facility status briefings.

4. Serve as the point of contact for the FirstEnergy Liaisons located in the State and County EOCs.

5.6 Records

5.6.1 Records Handling

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

5.6.2 Records Capture

The following records are generated by this document:

Quality Assurance Records

EOF Activation Checklist (PNPP No. 7988)
EOF HVAC Emergency Isolation Checklist (PNPP No. 8055)

Non-Quality Records

None

EOF ACTIVATION CHECKLIST
(TO BE COMPLETED BY THE EOF MANAGER)

PNPP No. 7988 Rev. 3/12/02 EPI-A8

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

B. Assess personnel resources available in EOF and TEC110 / 111 and assign the duties listed below to available communicators and support staff. Conduct additional callouts as needed.

C. Verify EOF manning levels:

Minimum EOF Staffing Requirements:
- ☐ Emergency Coordinator
- ☐ Plant Operations Advisor
- ☐ Offsite Radiation Advisor
- ☐ Dose Assessor #1
- ☐ Regulatory Affairs Coordinator
- ☐ EOF Manager
- ☐ "5-Way" Communicator
- ☐ ENS Communicator
- ☐ RMT Communicator

POSITIONS NOT REQUIRED TO DECLARE EOF OPERATIONAL:
- ☐ Plant Operations Assistant
- ☐ Environmental Liaison
- ☐ Dose Assessor #2
- ☐ HPN Communicator
- ☐ Information Liaison
- ☐ Support Staff #1 - Emergency Coordinator's Log
- ☐ Support Staff #2 - Plant Technical Data Board
- ☐ Support Staff #3 - Plant Radiological Data Board
- ☐ Support Staff #4 - EOF Clerk / Messenger

D. Direct available communicators to test the following circuits:

- ☐ Intra-Facility (EOF) PA
- ☐ Turn up Plant PA in EOF FirstEnergy Room and Display Rooms

E. ☐ Isolate the EOF HVAC per the Isolation Checklist (PNPP No. 8055) if a potential or actual radiation or airborne hazard to the EOF exists.

F. ☐ EOF Access Controller stationed. [NOTE: Notify Security Coordinator or SNSO if security officer is not yet stationed.]

NOT REQUIRED TO DECLARE FACILITY OPERATIONAL

G. Facility wall clocks in the Display Room, FirstEnergy Room, & Access Point synchronized with ICS.

Submitted By: _____ (EOF Manager) ____/____/____ (Date) @ _____ (Time) hours

EOF ACTIVATION CHECKLIST
(TO BE COMPLETED BY THE EMERGENCY COORDINATOR)

PNPP No. 7988 Rev. 3/12/02

EPI-A8

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

2. ☐ Announce over the Plant PA System that "the EOF is OPERATIONAL". Record time EOF declared OPERATIONAL in logbook.

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

   ☐ Notify the EOF Manager prior to assuming offsite notification responsibilities.

   ☐ Notify the Offsite Radiation Advisor prior to assuming responsibility for offsite PARs.

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

   ☐ Event Classification ☐ Offsite Notifications ☐ Offsite Protective Action Recommendations

Declared Operational: _____ ____/____/____ @ _____ hours
Emergency Coordinator — Date — Time

EOF HVAC EMERGENCY ISOLATION CHECKLIST

PNPP No. 8055 Rev. 3/12/02 EPI-A8

The following procedure is used to shift the first floor TEC/EOF HVAC system (M53) from "NORMAL" operation to EOF "EMERGENCY ISOLATION". Refer to M53 system diagrams as necessary.

1. ☐ Obtain the key for the 1st floor Mechanical Equipment Room from the EOF Emergency Key Box.

2. Proceed to first floor Mechanical Equipment Room.

   NOTE: All switches are located on Master Control Panel, 0M53-P001.

   ☐ a. Position or verify "FIRST FLOOR SMOKE DAMPER" Switch (S3) to "AUTO".

   ☐ b. Position or verify the "PLENUM OUTSIDE AIR INTAKE DAMPER F1" Switch (S6) to "CLOSE".

   ☐ c. Position or verify "FIRST FLOOR DAMPER MODE SELECTOR" Switch (S5) to "RECIRC".

   ☐ d. Position or verify the First Floor Air Handlers are enabled by placing the respective switch "0M53B0100A First Floor AHU" (S1) and "0M53B0100B First Floor AHU" (S2) to AUTO.

   ☐ e. Position "EMERGENCY ISOLATION SWITCH" (S7) to "EMERG ISOL".

3. ☐ Proceed to north-south corridor on the west side of the building and verify Isolation Door between TEC and EOF closed.

4. ☐ Proceed to north-south corridor on the east side of the building and verify Isolation Door between TEC and EOF closed.

   The EOF HVAC is now in the Emergency Isolation Mode.

   NOTE: Switch the sign for Ventilation Status in the Display Room and in the CEI Room to "Emergency Recirculation Mode".

5. If EOF temperature in one or more rooms increase or can not be maintained at an acceptable temperature, verify that the ceiling vents are open and base board heaters are off in the room(s) in question.

6. If temperature continues to increase the system will automatically swap to the standby unit.

7. Admit Filtered outside air to the EOF as desired for Ventilation purposes (to reduce stuffiness/CO_2 level) by performing the following at Master Control Panel, 0M53-P001.

   ☐ a. Open Damper 0M53-F048 (F1) by placing "PLENUM OUTSIDE AIR INTAKE DAMPER" Control Switch (S6) to OPEN.

   ☐ b. When outside air is no longer required Close Damper 0M53-F048 (F1) by placing "PLENUM OUTSIDE AIR INTAKE DAMPER" Control Switch (S6) to CLOSE.

8. If airborne activity levels increased significantly in the EOF with the HVAC in the Emergency Isolation mode, request via the TSC that OSC personnel be dispatched to the EOF to verify the isolation dampers are in the closed position. Initial verification can be made utilizing the installed computer located in the 2nd floor mechanical equipment room. If dampers are positioned properly in the computer and a problem is still suspected a visual inspection of the dampers should be performed.

EOF HVAC EMERGENCY ISOLATION CHECKLIST

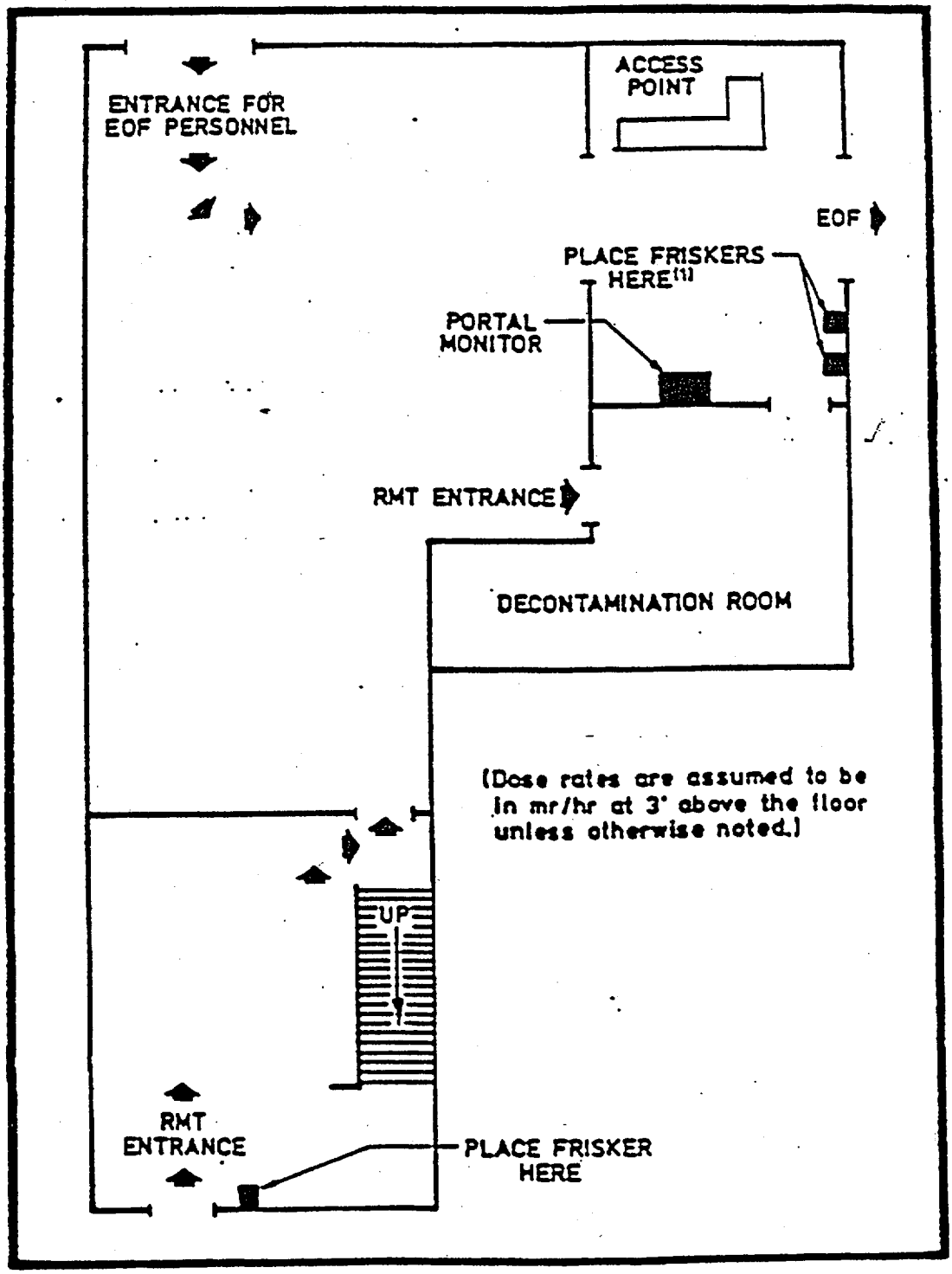
To return system to "NORMAL" operation:

9. ☐ Proceed to first floor Mechanical Equipment Room.
   NOTE: All switches are located on Master Control Panel, 0M53-P001.

   ☐ a. Position "EMERGENCY ISOLATION SWITCH" (S7) to "NORMAL"
   ☐ b. Return the air handling units 0M53-B100A and 0M53-B100B to Normal operation by placing or verifying the respective switches "0M53-B100A First Floor AHU" (S1) and "0M53-B100B First Floor AHU" (S2) to "AUTO"
   ☐ c. Position the "FIRST FLOOR DAMPER MODE SELECTOR" Switch (S5) to "AUTO".
   ☐ d. Position or verify the "PLENUM OUTSIDE AIR INTAKE DAMPER F1" Switch (S6) to "CLOSE".
   ☐ e. Position or verify "FIRST FLOOR SMOKE DAMPER" Switch (S3) to "AUTO".

10. The EOF is now in Normal Operation. Switch the sign for Ventilation Status in the Display Room and in the FirstEnergy "Normal Mode".

EOF ACCESS CONTROL POINT SET-UP



(1) Set friskers if portal monitor is not operational

PORTAL RADIATION MONITOR RESPONSE CHECK <L01314>

Response check the Gamma-10 portal radiation monitor using the following steps:

1. Energize the portal monitor.

   NOTE: When the Gamma 60 is initially energized, a 30 second background count is taken. Wait for completion of the background count before proceeding.

2. Obtain check source from Cabinet #5 in the EOF Decontamination Room and proceed to the front of portal monitor.

   NOTE: Portal monitor are very sensitive. If Gamma 60 alarms as you proceed to the front of monitor, remove the source from the area and press the black reset button.

3. Verify that each Gamma 60 portal monitor detector (6 total) responds to the check source by producing both an audible and visual alarm.

4. Initial Response Check Calendar, Form #6883, which is located on the exit side of the portal detector, upon completion of a satisfactory response check.

5. If the Gamma 60 portal monitor does not respond properly to the response check, perform the following:

   - Prepare and attach a DO NOT USE tag to the portal monitor.
   - Notify the Lead EOF Dose Assessor.
   - Stage frisking stations outside the EOF Decontamination Room per Attachment 3.

FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant

Controlled Document Instruction Sheet

Manual: Emergency Plan Implementing Procedures for Perry Nuclear Power Plant (EPI), **EPI-B8 Rev. 8, C-5**

Control Number 60

Remove the pages listed below and insert enclosed pages:

Revision Number	Temporary Change No.	Insert	and	Remove
8	C-5	Reissue	Entire	Document

PERRY OPERATIONS MANUAL

PNPP
[redacted]
No 0 6 0

Emergency Plan Implementing Instruction

INFORMATION ONLY

TITLE: PROTECTIVE ACTIONS AND GUIDES

REVISION: 8 EFFECTIVE DATE: 5-1-97

PREPARED: Joseph D. Anderson 1-4-97
/ Date

EFFECTIVE PIC's

PIC No.	Type of Change	Effective Date
2	Intent	6-15-98
3	Intent	9-21-98
4	Admin	4-4-01
5	Admin	3-26-02

PROTECTIVE ACTIONS AND GUIDES

Table of Contents

SCOPE OF REVISION:

Periodic Review - Required

Rev. 8 - 1. Revises the default protective action recommendations (PARs) to eliminate action based on Containment radiation levels and to implement evacuation logic based on Supplement 3 to NUREG-0654/FEMA-REP-1.

Change History

PIC Number: 2 Affected Pages: i, iii, 13

Summary of Change:
1. Consolidated Table 6-1 protective action recommendation logic based on projected or actual dose into Section 6.4.1 text.
2. Criteria also revised to eliminate redundancy with minimum plant status PAGs based on Supplement 3 to NUREG-0654/FEMA-REP-1.

PIC Number: 3 Affected Pages: i, iii, 3, 3a, 7, 8, 9, 10

Summary of Change:
1. Identifies the U.S. DOE-sponsored REAC/TS as point of contact through the OEMA for guidance of KI issuance and health effects.
2. Deletes RMC as the point of contact for obtaining additional KI.
3. Description for REAC/TS facility added under "Definitions".

PIC Number: 4 Affected Pages: i, iii, 2, 3

Summary of Change:
1. Changed references from PAP-0511 to PAP-0114.

PIC Number: 5 Affected Pages: i, iii, 3, 4, 5, 6, 8, 12, 15

Summary of Change:
1. Corrected Operations Section personnel titles from Shift Supervisor and Shift Technical Advisor to Shift Manager and Shift Engineer respectively.
2. On Attachment 2, corrected the term "PAGs" to "PARs" for all references to Protective Action Recommendations (vice Protective Action Guidelines).
3. Corrected a typo on page 6.

PROTECTIVE ACTIONS AND GUIDES

1.0 PURPOSE

This instruction provides guidelines for the formulation of protective actions for the plume exposure pathway to be recommended to State of Ohio and local county Emergency Management Agencies in the event of an emergency involving the possibility of an abnormal release of radioactive material(s) at the Perry Plant.

Development of ingestion pathway protective action recommendations will be the responsibility of the State of Ohio and Federal response agencies. The Perry Plant will assist in the collection and analysis of environmental samples using <EPI-B10>.

2.0 REFERENCES

2.1 Source References:

1. 10CFR20, Standards for Protection Against Radiation
2. EPA-400-92-R-001, Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (October 1991)
3. U.S. Nuclear Regulatory Commission Response Technical Manual (RTM) - 92 (October 1992)
4. Emergency Plan for PNPP Docket Nos. 50-440, 50-441
5. Emergency Plan Implementing Instruction (EPI) B7a: "Automated Offsite Dose Calculations"
6. Emergency Plan Implementing Instruction (EPI) B7b: "Manual Offsite Dose Calculations"
7. Patient Package Insert for THYRO-BLOCK™, Wallace Laboratories (10/79)

2.2 Use References:

1. Emergency Plan Implementing Instruction (EPI) B10: "Emergency Radiological Environmental Monitoring Program"
2. Emergency Plan Implementing Instruction (EPI) B3: "Radiological Surveys for Emergencies"
3. Emergency Plan Implementing Instruction (EPI) B1: "Emergency Notification System"

4. Emergency Plan Implementing Instruction (EPI) A1: "Emergency Action Levels"

5. Emergency Plan Implementing Instruction (EPI) A2: "Emergency Actions Based On Event Classification"

6. Emergency Plan Implementing Instruction (EPI) A11: "Activation of the Backup Emergency Operations Facility"

7. Supplement 3 to NUREG-0654/FEMA-REP-1 (Revision 1): "Criteria for Protective Action Recommendations for Severe Accidents"

8. Plant Administrative Procedure (PAP) 0114: "Radiation Protection Program"

9. Commitments addressed in this document:

H00022	P00005	P00029	P00046
H00024	P00011	P00037	

3.0 DEFINITIONS

3.1 Protective Actions

Those emergency measures taken before or after an uncontrolled release of radioactive material has occurred to prevent or minimize radiological exposure to persons that would likely be exposed, if the actions were not taken.

3.2 Protective Action Guides (PAGs)

Projected radiological doses to individuals in the general population that warrant Protective Actions following a release of radioactive material. Protective Actions would be warranted provided the reduction in individual dose is not offset by excessive risks to individual safety in taking the Protective Action. The Protective Action Guide (PAG) does not include the dose that has unavoidably occurred prior to the assessment.

3.3 Deep Dose Equivalent (DDE)

The dose equivalent measured at a tissue depth of 1 cm (1000 mg/cm^2). DDE is the external component of TEDE.

3.4 Committed Dose Equivalent (CDE)

The dose equivalent to organs or tissues of reference that will be received from an intake of radioactive material by an individual during the 50 year period following the uptake.

3.5 Committed Effective Dose Equivalent (CEDE)

The sum of the products of the weighting factors applicable to each of the body organs or tissues and the CDE to these organs or tissues. CEDE is the internal dose component of TEDE.

3.6 Total Effective Dose Equivalent (TEDE)

Sum dose of DDE (external dose) and CEDE (internal dose).

3.7 Derived Air Concentration (DAC)

The concentration of a given radionuclide in air which, if breathed by the reference man for a working year of 2,000 hours under conditions of light work (inhalation rate of 1.2 cubic meters of air per hour), results in an intake of one Annual Limit on Intake (ALI) per PAP-0114.

3.8 Radiation Emergency Assistance Center/Training Site (REAC/TS)

REAC/TS is operated by the Medical Sciences Division of the Oak Ridge Institute for Science and Education for the U.S. Department of Energy (DOE). REAC/TS provides 24-hour direct or consultative assistance with medical and health physics problems associated with radiation accidents in local, national, and international incidents.

4.0 RESPONSIBILITIES

4.1 **Emergency Coordinator**

1. Approve plume exposure pathway protective action recommendations (PARs) for the general public.

2. Notify the State of Ohio, local counties, and Nuclear Regulatory Commission (NRC) of changes in PARs for the general public developed by the Perry Plant.

3. Approve the use of Potassium Iodide (KI) by Radiation Monitoring Team (RMT) personnel.

4.2 **TSC Operations Manager**

1. Assume the responsibilities of the Emergency Coordinator prior to the Emergency Operations Facility (EOF) being operational.

2. Approve the usage of Potassium Iodide (KI) for all onsite Emergency Response Organization (ERO) personnel. <P00011>

4.3 **Shift Manager**

1. Assume the responsibilities of the TSC Operations Manager prior to the Technical Support Center (TSC) being operational.

4.4 EOF Offsite Radiation Advisor

1. Supervise the development of plume exposure pathway PAR for the general public.

2. Review PAR developed for the general public and recommend approval.

3. Recommend approval for the use of KI for RMT personnel.

4.5 **TSC Radiation Protection Coordinator** <P00046>

1. Assume the responsibilities of the EOF Offsite Radiation Advisor prior to the EOF being operational.

2. Recommend approval for the use of KI for all onsite ERO personnel.

4.6 **Shift Engineer**

1. Review PARs developed for the general public prior to the TSC being operational.

2. Assist in estimating the duration of a release and the prognosis for the restoration or failure of plant equipment/structures which may result in a release being terminated or (re)initiated.

4.7 **TSC/EOF Dose Assessor(s)**

1. Develop plume exposure pathway PARs for the general public per this instruction.

4.8 **Shift Lead Chemistry Technician**

1. Assume responsibility for developing PARs for the general public prior to the TSC being operational.

4.9 **TSC Operations Advisor/EOF Plant Operations Advisor**

1. Assist in estimating the duration of a release and the prognosis for the restoration or failure of plant equipment/structures which may result in the release being terminated or (re)initiating.

5.0 ACTIONS

5.1 Protective Action Logic

5.1.1 **Shift Lead Chemistry Technician/Dose Assessor:**

1. Use the PAR Decision Flow Chart (Attachment 1), to choose the appropriate PAR method based on either:

   - General Emergency Default PAR (Attachment 2)
   - PAR Based on Actual or Projected Dose (Attachment 3)

   -- If a PAR based on an actual or projected dose can not be determined within 10 minutes of the declaration of the General Emergency, use the default PAR developed per Attachment 2. A PAR upgrade shall be made as part of a subsequent offsite notification per <EPI-B1> based on projected or actual dose, when available, if warranted.

-- If the release has not been terminated and an estimate on release duration is not immediately available from the Shift Engineer (SE)/TSC Operations Advisor/EOF Plant Operations Advisor, a 6 hour default release duration shall be used.

2. Submit the PAR, along with supporting data, for review and subsequent approval to the SE/TSC Radiation Protection Coordinator (RPC)/EOF Offsite Radiation Advisor (ORA).

   -- If the SE is not stationed (prior to transferring PAR responsibilities to the TSC), forward the PAR directly to the Shift Manager for approval.

3. Assist, when directed, in completing appropriate portions of the Initial Notification (PNPP No. 7794) and Follow-Up Notification (PNPP No. 7795).

4. Monitor potential upgrades or changes in the PAR based on degrading plant conditions or changes in wind direction or other meteorological conditions, and if warranted, recommend required PAR changes to the SE/TSC RPC/EOF ORA in accordance with logic contained in Attachments 2 and 3, as appropriate.

5. Turnover PAR development duties from the Control Room to the TSC, and subsequently to the EOF, when directed.

5.1.2 **Shift Engineer (SE)/TSC Radiation Protection Coordinator (RPC)/ EOF Offsite Radiation Advisor (ORA):**

1. Review PARs developed for the general public and recommend their approval based the following methods, as applicable per the PAR Decision Flowchart (Attachment 1):

   - General Emergency Default PAR (Attachment 2)
   - PAR Based on Actual or Projected Dose (Attachment 3)

2. Ensure that changes in PARs, including their effect on existing subarea protective actions, are adequately reflected in a timely manner on offsite notifications conducted per <EPI-B1>.

   -- If the release has not been terminated and an estimate on release duration is not immediately available from the Shift Engineer (SE)/TSC Operations Advisor/EOF Plant Operations Advisor, a 6 hour default release duration shall be used.

3. Provide clarification when required to facility staff on the factors considered in developing the PAR.

4. Periodically review the PAR based on degrading plant conditions or changes in wind direction or other meteorological conditions to ensure that required protective actions are being considered in accordance with the PAR logic outlined in Attachments 2 and 3, as appropriate. <P00029>

5. Assist in completing appropriate portions of the Initial Notification (PNPP No. 7794) and Follow-Up Notification (PNPP No. 7795).

6. Ensure the coordinated turnover of PAR development and review duties from the Control Room to the TSC, and subsequently to the EOF.

5.1.3 **Emergency Coordinator:**

1. Determine if the appropriate method was used to determine the PAR using the PAR Decision Flow Chart (Attachment 1).

2. Approve PARs for the general public developed utilizing the following methods and ensure that the State of Ohio, local counties, and the NRC are notified per <EPI-B1>:

   - General Emergency Default PAR (Attachment 2)
   - PAR Based on Actual or Projected Dose (Attachment 3)

   -- If a PAR based on an actual or projected dose can not be determined within 10 minutes of the declaration of the General Emergency, use the default PAR developed per Attachment 2.

3. Ensure that PAR is periodically evaluated based on degrading plant conditions or changes in wind direction or other meteorological conditions using Attachments 2 and 3, as appropriate. <P00029>

4. Ensure the timely and coordinated turnover of PAR approval duties from the Control Room to the TSC, and subsequently to the EOF, when the non-delegatable Emergency Coordinator responsibilities are transferred per <EPI-A2>.

5.2 <u>Potassium Iodide (KI) Distribution to Onsite Emergency Response Organization (ERO) Personnel</u> <H00022, H00024>

<u>NOTE</u>: Recommending the use of KI by the general public is the responsibility of the local County officials. The Perry Plant is <u>not</u> responsible for recommending the use of KI for the general public.

5.2.1 **TSC Radiation Protection Coordinator:**

1. Direct that the following information be recorded on a Potassium Iodide (KI) Tracking Form (PNPP No. 9177, Attachment 5) for each Control Room, TSC, Operations Support Center (OSC) and EOF staff member who has exceeded or may exceed an airborne concentration of 4000 Derived Air Concentration (DACs) AND can not be relocated, dismissed, or have work activities altered to avoid receiving a dose of 10 Rem CDE to the adult thyroid (CDE - child thyroid x 2):

   a. Full name,

   b. Social Security No.,

   c. Employee's Section/Unit, and

   d. Estimated date/time of exposure.

   NOTE: KI is 90% effective if administered within 1 hour after inhalation or ingestion, and 50% effective if administered within 4 hours after inhalation or ingestion.

2. Review completed form(s) and forward to TSC Operations Manager for approval.

5.2.2 **TSC Operations Manager:**

1. Discuss with TSC Radiation Protection Coordinator whether sufficient As Low As Reasonably Achievable (ALARA) precautions have been taken in lieu of KI.

   NOTE: Activation of the Backup EOF per <EPI-A11> should be initiated in lieu of issuing KI to EOF staff. KI should only be issued to EOF staff when necessary to allow for movement of personnel from the EOF, if needed, once deactivated.

2. Once a need for KI is determined, approve the distribution of KI by signing the KI Tracking Form(s).

3. Contact the Ohio Emergency Management Agency (OEMA), using the telephone number listed in the Emergency Response Telephone Directory, to obtain guidance from the Radiation Emergency Assistance Center/Training Site (REAC/TS) on further issuance of KI to those individuals who were already issued the drug.

   NOTE: A dosage of one tablet per day for ten days should be followed unless instructed otherwise after consulting with REAC/TS.

4. Order additional quantities of KI through the ODH, as required, using the telephone number listed in the Emergency Response Telephone Directory.

   NOTE: Sufficient KI is available onsite for three shifts per day for ten days (except for the EOF which only has limited quantities of KI for evacuation purposes). <P00011>

5.2.3 **Shift Manager/OSC Health Physics Supervisor/TSC Radiation Protection Coordinator/EOF Offsite Radiation Advisor:**

1. Brief facility staff to be issued KI on the possible side effects using the manufacturer's patient package insert located on the back of the KI Tracking Forms, and ensure that each individual has no known allergies to iodide.

   NOTE: Ingestion of KI, even as a precautionary measure, is a voluntary act and, therefore, at the discretion of each individual.

2. Instruct each employee receiving KI to initial the KI Tracking Form.

3. Distribute one KI tablet (130 mg.) to each authorized individual, and record the date/time issued on the KI Tracking Form.

   NOTE: KI is stored in the E-Plan equipment/supply cabinets in the Control Room, TSC Display Room, OSC Conference Room, and in the EOF Decontamination Room.

4. Do not dismiss staff members issued KI until guidance on further KI usage can be obtained from REAC/TS.

5.3 Potassium Iodide (KI) to RMT Members <H00022, H00024>

5.3.1 **TSC/EOF Dose Assessors:**

1. Identify to the EOF Offsite Radiation Advisor the need to consider issuing KI to RMT members who have exceeded or may exceed a dose of 10 Rem CDE to the adult thyroid (CDE - child thyroid x 2).

   -- If the EOF is not operational, this concern shall be brought to the attention of the TSC Radiation Protection Coordinator.

2. Once issuance of KI has been approved, ensure that RMT members are briefed on the possible side effects using the manufacturer's patient package insert located on the back of the KI Tracking Form, and ensure that each individual has no known allergies to iodide.

   NOTE: Ingestion of KI, even as a precautionary measure, is a voluntary act and, therefore, at the discretion of each individual.

3. Document RMT members concurrence to taking KI by having each individual initial on the KI Tracking Form.

   a. If team is currently in the field, obtain a verbal concurrence from each RMT member and document response in RMT Log. Direct RMT members to initial KI Tracking Form upon their return to the Perry Plant site.

4. Direct authorized RMT member(s) to take one KI tablet each (130 mg.).

   NOTE: One bottle of KI (14 tablets) each is stored in RMT Sampling Kit.

5. Record the date/time issued block on the KI Tracking Form, when notified by RMT member that he/she has ingested KI tablet.

6. Do not dismiss RMT members issued KI until guidance on further KI usage can be obtained from REAC/TS by contacting the OEMA, using the telephone number listed in the Emergency Response Telephone Directory.

5.3.2 **EOF Offsite Radiation Advisor:**

1. Evaluate the need for KI and, if deemed necessary, direct that the following information be completed on a Potassium Iodide Tracking Form (PNPP No. 9177, Attachment 5) for each RMT member:

   a. Full Name,

   b. Social Security No.,

   c. Employee's Section/Unit, and

   d. Estimated date/time of exposure.

   NOTE: Per <EPI-B3>, movement of the RMTs should be limited to monitoring the plume boundaries if an exposure of 1 Rem TEDE or 10 Rem CDE (adult thyroid) would be exceeded in traversing the plume.

2. Review the KI Tracking Form to ensure that above information on each individual is recorded; then forward tracking form to Emergency Coordinator for approval.

   -- If the EOF is not yet operational, the TSC Operations Manager will be responsible for approving issuance of KI.

3. Notify the TSC/EOF Dose Assessor(s) when approval is obtained for issuing KI.

4. Contact the OEMA, using the telephone number listed in the Emergency Response Telephone Directory, to obtain guidance from REAC/TS on further issuance of KI to those individuals who were already issued the drug.

5.3.3 **EOF Emergency Coordinator:**

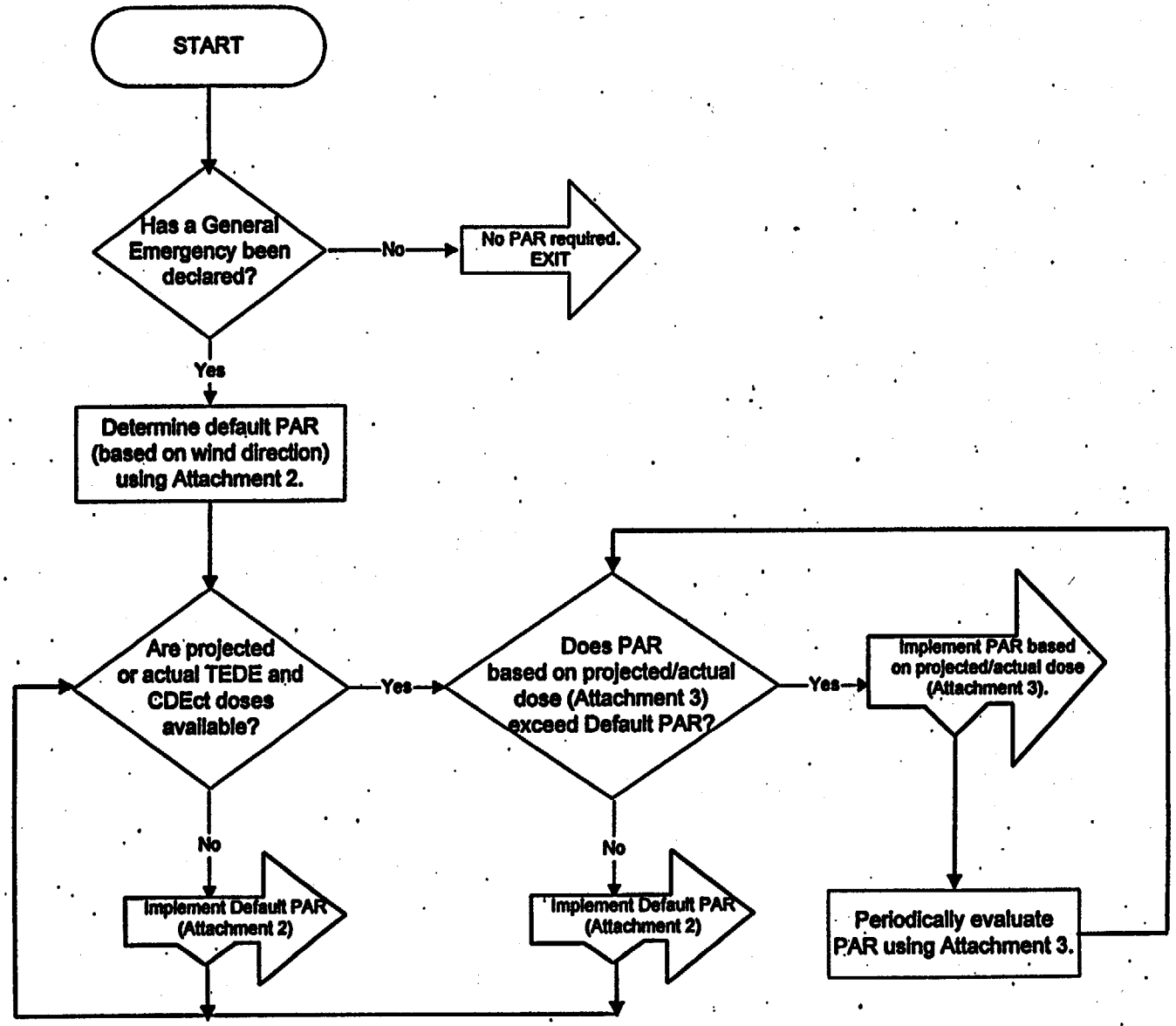
1. Discuss with EOF Offsite Radiation Advisor whether sufficient ALARA precautions have been taken in lieu of KI and that adequate justification exists for issuance of KI.

2. Once the need for KI is determined, approve the issuance of KI to RMT members by signing the completed KI Tracking Form(s).

PAR DECISION FLOWCHART

NF1051

EPI-B8



GENERAL EMERGENCY DEFAULT PAR

The following protective action recommendations (PARs) are based on the potential for a major release of radioactive material from the Perry plant per the guidance set forth in Supplement 3 to <NUREG-0654/FEMA-REP-1>. The intent of these PARs is to provide a means of promptly implementing a minimum evacuation for the general public within 5 miles of the Perry Plant until a detailed assessment can be performed. Implict in these PARs is that assessment actions will continue to determine what additional protective actions are required to ensure the health and safety of the general public.

The minimum PARs based on wind direction (FROM) for the declaration of a General Emergency, as applicable for Subareas 1, 2, 3 and/or Lake Erie (as identified on 10-Mile EPZ Sectors Versus Subareas Map [Attachment 4]), are as follows:

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

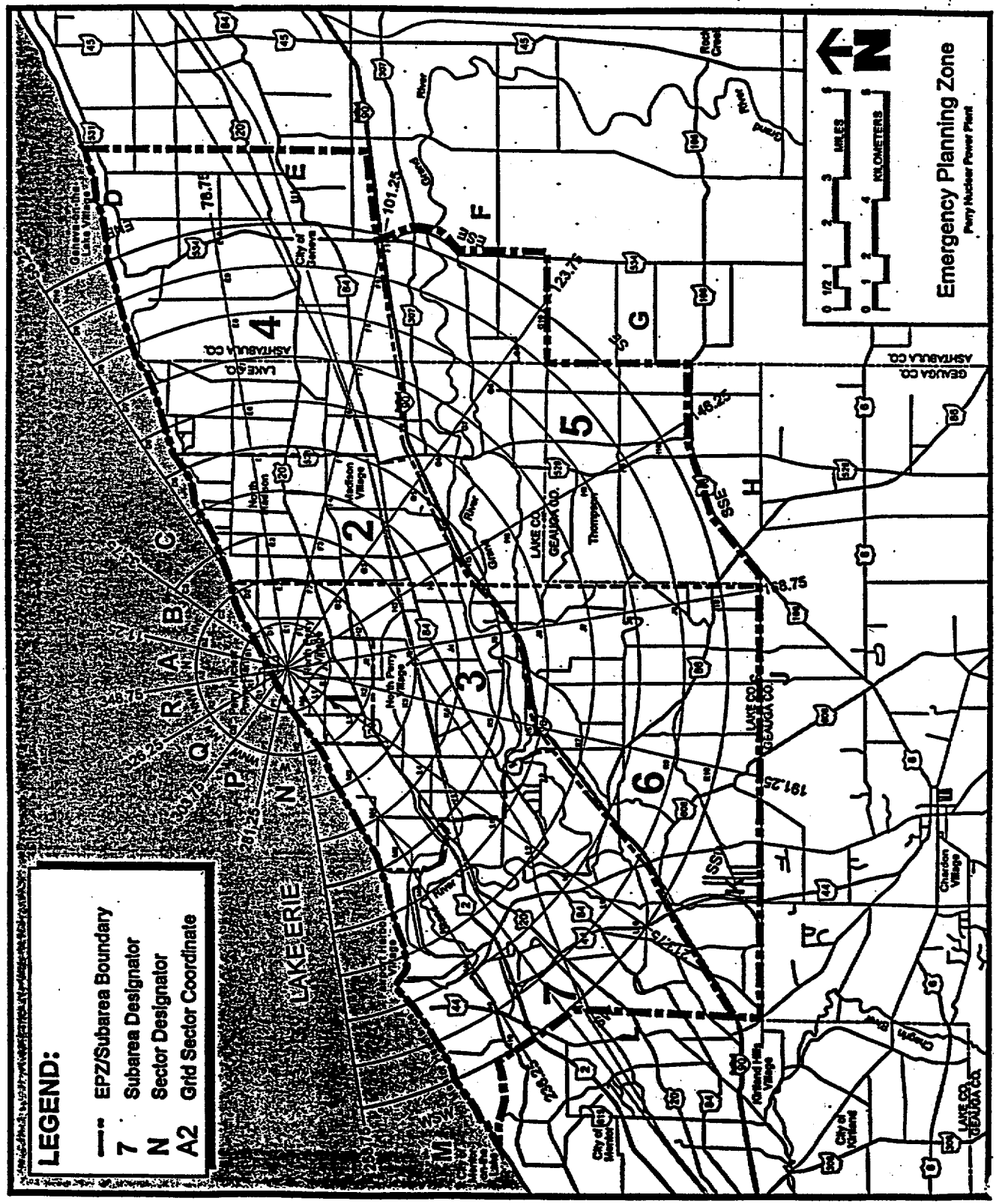
These PARs assume that a General Emergency has been declared per the criteria established in <EPI-A1>. <P00037>

PAR BASED ON ACTUAL OR PROJECTED DOSE

IF TEDE ≥ 1 REM OR CDEct ≥ 5 REM
FROM 5 TO 10 MILES,
recommend one of the following
based on wind direction (FROM):

WIND DIRECTION (FROM)	AFFECTED SUBAREA(S)
102 to 213 degrees	EVACUATE 1 & Lake
214 to 258 degrees	EVACUATE 1, 2, 4 & Lake
259 to 281 degrees	EVACUATE 1, 2, 4, 5 & Lake
282 to 303 degrees	EVACUATE 1, 2, 3, 4 & 5
304 to 326 degrees	EVACUATE 1, 2, 3, 4, 5 & 6
327 to 348 degrees	EVACUATE 1, 2, 3, 5 & 6
349 to 11 degrees	EVACUATE 1, 2, 3, 5, 6 & 7
12 to 33 degrees	EVACUATE 1, 3, 6, & 7
34 to 56 degrees	EVACUATE 1, 3, 6, 7 & Lake
57 to 101 degrees	EVACUATE 1, 3, 7 & Lake

10-MILE EPZ SECTORS VERSUS SUBAREAS MAP



POTASSIUM IODIDE (KI) TRACKING FORM

PNPP No. 9177 Rev. 2/26/02

EPI-B8

Recommended dose: 1 tablet/day = 130 mg

This form shall be completed by the Shift Manager for Control Room staff, Radiation Protection Coordinator for TSC staff (and RMTs prior to EOF activation), OSC Health Physics Supervisor for OSC staff and Security personnel and Offsite Radiation Advisor for EOF staff and RMTs.

KI ISSUED TO: (FULL NAME)	SOCIAL SECURITY No.	EMPLOYEE'S SECTION/UNIT	EST DATE/TIME OF EXPOSURE		KI ISSUED AT		INITIALS OF EMPLOYEE RECEIVING KI*
			DATE	TIME	DATE	TIME	

Use Approved: _____ #
(per EPI-B8, Sect. 5.2)

Use of KI approved for only those individuals listed above. Complete a separate tracking form to approve and document further KI usage.

* Employee's initials indicate that he/she has read the information from the manufacturer's package insert located on the back of this form and understands that taking KI is voluntary. The employee also acknowledges that to the best of his/her knowledge he/she has no allergies to iodide.

DISTRIBUTION: WHITE – FACILITY RECORDS CANARY – DISPENSARY (CORPORATE MEDICAL DIRECTOR)

POTASSIUM IODIDE (KI) TRACKING FORM (PNPP No. 9177)

Patient Package Insert For

THYRO-BLOCK®
TABLETS
(POTASSIUM IODIDE TABLETS, USP)
(pronounced poe-TASS-e-um EYE-oh-dyed)
(abbreviated: KI)

TAKE POTASSIUM IODIDE ONLY WHEN PUBLIC HEALTH OFFICIALS TELL YOU. IN A RADIATION EMERGENCY, RADIOACTIVE IODINE COULD BE RELEASED INTO THE AIR. POTASSIUM IODIDE (A FORM OF IODINE) CAN HELP PROTECT YOU.

IF YOU ARE TOLD TO TAKE THIS MEDICINE, TAKE IT ONE TIME EVERY 24 HOURS. DO NOT TAKE IT MORE OFTEN. MORE WILL NOT HELP YOU AND MAY INCREASE THE RISK OF SIDE EFFECTS. *DO NOT TAKE THIS DRUG IF YOU KNOW YOU ARE ALLERGIC TO IODIDE.* (SEE SIDE EFFECTS BELOW.)

INDICATIONS
THYROID BLOCKING IN A RADIATION EMERGENCY ONLY.

DIRECTIONS FOR USE
Use only as directed by State or local public health authorities in the event of a radiation emergency.

DOSE
Tablets: ADULTS AND CHILDREN 1 YEAR OF AGE OR OLDER: One (1) tablet once a day. Crush for small children.
BABIES UNDER 1 YEAR OF AGE: One-half (½) tablet once a day. Crush first.

Take for 10 days unless directed otherwise by State or local public health authorities.

Store at controlled room temperature between 15° and 30°C (59° to 86°F). Keep container tightly closed and protect from light.

WARNING
Potassium iodide should not be used by people allergic to iodide. Keep out of reach of children. In case of overdose or allergic reaction, contact a physician or the public health authority.

DESCRIPTION
Each THYRO-BLOCK® TABLET contains 130 mg of potassium iodide. Other ingredients: magnesium stearate, microcrystalline cellulose, silica gel, sodium thiosulfate.

HOW POTASSIUM IODIDE WORKS
Certain forms of iodine help your thyroid gland work right. Most people get the iodine they need from foods, like iodized salt or fish. The thyroid can "store" or hold only a certain amount of iodine.

In a radiation emergency, radioactive iodine may be released in the air. This material may be breathed or swallowed. It may enter the thyroid gland and damage it. The damage would probably not show itself for years. Children are most likely to have thyroid damage.

If you take potassium iodide, it will fill up your thyroid gland. This reduces the chance that harmful radioactive iodine will enter the thyroid gland.

WHO SHOULD NOT TAKE POTASSIUM IODIDE
The only people who should not take potassium iodide are people who know they are allergic to iodide. You may take potassium iodide even if you are taking medicines for a thyroid problem (for example, a thyroid hormone or antithyroid drug). Pregnant and nursing women and babies and children may also take this drug.

HOW AND WHEN TO TAKE POTASSIUM IODIDE
Potassium Iodide should be taken as soon as possible after public health officials tell you. You should take one dose every 24 hours. More will not help you because the thyroid can "hold" only limited amounts of iodine. Larger doses will increase the risk of side effects. You will probably be told not to take the drug for more than 10 days.

SIDE EFFECTS
Usually, side effects of potassium iodide happen when people take higher doses for a long time. You should be careful not to take more than the recommended dose or take it for longer than you are told. Side effects are unlikely because of the low dose and the short time you will be taking the drug.

Possible side effects include skin rashes, swelling of the salivary glands, and "iodism" (metallic taste, burning mouth and throat, sore teeth and gums, symptoms of a head cold, and sometimes stomach upset and diarrhea).

A few people have an allergic reaction with more serious symptoms. These could be fever and joint pains, or swelling of parts of the face and body and at times severe shortness of breath requiring immediate medical attention.

Taking iodide may rarely cause overactivity of the thyroid gland, underactivity of the thyroid gland, or enlargement of the thyroid gland (goiter).

WHAT TO DO IF SIDE EFFECT OCCUR
If the side effects are severe or if you have an allergic reaction, stop taking potassium iodide. Then, if possible, call a doctor or public health authority for instructions.

HOW SUPPLIED
THYRO-BLOCK® TABLETS (Potassium Iodide Tablets, USP) bottles of 14 tablets (NDC 0037-0472-20). Each white, round, scored tablet contains 130 mg potassium iodide.

WALLACE LABORATORIES
Division of
CARTER-WALLACE, INC.
Cranbury, New Jersey 08512

IN-0472-01 Rev 2/85

FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant

Controlled Document Instruction Sheet

Manual: Emergency Plan Implementing Procedures for Perry Nuclear Power Plant (EPI), **EPI-B5 Rev. 6, C-7**

Control Number 60

Remove the pages listed below and insert enclosed pages:

Revision Number	Temporary Change No.	Insert	and	Remove
6	C-7	i thru 4, 11 thru Last		

PERRY OPERATIONS MANUAL

PNPP
[redacted]

Emergency Plan Implementing Instruction No 060

TITLE: PERSONNEL ACCOUNTABILITY/SITE EVACUATION

REVISION: 6 EFFECTIVE DATE: 7-27-95

PREPARED: Joseph D. Anderson 4-2-95
/ Date

EFFECTIVE PIC's

PIC No.	Type of Change	Effective Date
1	Intent	5-29-96
2	Intent	8-30-96
3	Intent	4-21-97
4	Intent	6-15-98
5	Admin	1-20-00
6	Non-Intent	4-4-01
7	Admin	3-28-02

PERSONNEL ACCOUNTABILITY/SITE EVACUATION

Table of Contents

SCOPE OF REVISION:

Rev. 6 -
1. Provides flow chart attachments to better delineate ERO response.
2. Insert wording for pre-recorded "Emergency" message on Exclusion Area Page and Tone Alert Radio Systems.
3. Incorporates and supersedes POP-1901.
4. Provides guidance on the activation of county facilities and services to support site personnel without transportation. [PIF #95-455]
5. Bring procedure up to date with the current format.
6. Revised in its entirety.
7. Consolidates former TSC Admin. Asst. duties with TSC Security Coordinator actions.

Change History

PIC Number: 1 Affected Pages: ii, 3, 4, 5, 6, 9, 9a, 10, 12, 13, 15, 16, 17, 18

Summary of Change:
1. Addresses use of County monitoring and decontamination centers for site evacuees, in lieu of Company facilities.

PIC Number: 2 Affected Pages: i, iii, 5, 7, 9

Summary of Change:
1. Changes relocation center for site personnel without transportation from Auburn Career Center to Mentor High School Football Stadium.

PIC Number: 3 Affected Pages: i, iii, 5, 7, 7a, 8, 13, 14

Summary of Change:
1. Directs TSC and OSC staff to utilize TSC hallway card reader for accountability purposes as part of facility activation.

PIC Number: 4 Affected Pages: i, iii, 3, 5, 8

Summary of Change:
1. Eliminate reference to the use of onsite tone-alert radio units within the Owner-Controlled Area.

PIC Number: 5 Affected Pages: i, iii, 1

Summary of Change:
1. Change company name to read FENOC.

PIC Number: 6 Affected Pages: i, iii, 3

Summary of Change:
1. Added a NOTE stating that it may be prudent to delay implementation of Site Accountability in situations where personnel safety could be jeopardized, such as during a security event or in severe weather. This note is consistent with the note in other EPIs that address accountability.

PIC Number: 7 Affected Pages: i, ii, iii, 2, 3, 4, 12, 13, 14, 15

Summary of Change:
1. Updated Operations Section titles (Shift Manager, Plant Operators), company name (CEI to FE), GET to PAT, GET Auditorium to Corbett Auditorium, and corrected 2 typos.

PERSONNEL ACCOUNTABILITY/SITE EVACUATION

1.0 PURPOSE

This instruction outlines actions to be taken during an emergency at the Perry Plant for the accountability of all FirstEnergy Nuclear Operating Company (FENOC) employees, contractors, consultants, and visitors within the site boundary, including those involved in Control Room activities or members of the Emergency Response Organization (ERO).

Personnel accountability will be implemented upon declaration of a Site Area Emergency, or based on the discretion of the Emergency Coordinator, with all personnel within the Protected Area being accounted for within 30 minutes. If the emergency escalates to a General Emergency without having been previously classified as a Site Area Emergency, accountability shall be initiated upon declaring the General Emergency. Once implemented, accountability is to be maintained continuously thereafter until the emergency is terminated or until otherwise directed by the Operations Manager.

2.0 REFERENCES

2.1 Source References:

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

2. Nuclear Regulation (NUREG) 0654: "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants"

2.2 Use References:

1. Security Post Instruction (SPI) 0023: "Instructions for Personnel Accountability and Site Evacuation"

2. Commitments addressed in this document:

   L00406 P00006 P00073

3.0 DEFINITIONS

3.1 Accountability

Actions taken to ascertain the whereabouts of persons within the Site Boundary either by means of evacuation or assembly.

3.2 Protected Area

The area encompassing the Vital Areas, all areas inside the double perimeter barrier fence and the Primary Access Control Point (PACP).

3.3 Project Support Area

The area within the site boundary encompassed by a security fence which encloses the warehouse building, office buildings, and contractor support areas, and to which access is controlled for security purposes.

3.4 Site Boundary

The area within the Owner-Controlled Area, which includes the Protected Area and the Project Support Area, and is encompassed by a security fence surrounding the Perry Plant.

3.5 Owner-Controlled Area

Areas owned by the FirstEnergy Corporation which are located within or adjacent to the Site Boundary security fence.

4.0 RESPONSIBILITIES

4.1 **TSC Operations Manager**

1. As acting Emergency Coordinator, ensure the initiation of accountability as required by this instruction.

2. Assume overall authority for the accountability of personnel within the Site Boundary area.

4.2 **Shift Manager**

1. Assume the Technical Support Center (TSC) Operations Manager's duties prior to the TSC being declared operational.

2. Ensure the prompt accountability of Control Room staff and on-shift personnel.

4.3 **TSC Radiation Protection Coordinator**: Assess radiological conditions and recommend the use of the designated offsite monitoring/decontamination centers or other areas on-site.

4.4 **TSC Security Coordinator**

1. Coordinate the implementation of accountability measures by the Supervisor, Nuclear Security Operations (SNSO) in support of the TSC Operations Manager.

2. Oversee accountability of TSC staff members.

4.5 **OSC Coordinator**: Direct the accountability of personnel responding to or already staffing the Operations Support Center (OSC).

4.6 **Supervisor, Nuclear Security Operations (SNSO)**: Direct the actions of the security force personnel in obtaining the accountability of onsite personnel in accordance with <SPI-0023>.

4.7 **Perry Plant Section Managers**: Ensure that Company, Contractor, and consultant personnel are trained in their appropriate response to accountability through Plant Access Training (PAT), this instruction, or other periodic training as deemed necessary.

4.8 **Perry Plant Personnel**: Follow the requirements of this instruction when personnel accountability is initiated.

4.9 **Regulatory Affairs Coordinator**: Notify local county Emergency Operations Centers (EOCs) when the activation of offsite monitoring/decontamination centers is required in support of site evacuation.

5.0 ACTIONS

5.1 **TSC Operations Manager** shall:

5.1.1 Determine, based on the TSC Radiation Protection Coordinator's recommendation, whether the offsite monitoring/decontamination centers should be activated to monitor personnel evacuating the site due to a significant radiological release or to assemble contractor/vendor support evacuated from the site during outages.

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

5.1.2 Direct the Shift Manager to initiate the applicable pre-recorded "Emergency" (Accountability) Message (Attachment 1) on the Exclusion Area Paging (R53) System.

1. Provide additional guidance, if required, to personnel evacuating the site, using the R53 PA feature, for the following:

- designated evacuation routes due to a security contingency
- use of offsite monitoring and decontamination centers

5.1.3 Direct the Security Coordinator to perform the following:

1. Deleted

5.1.4 If the offsite monitoring/decontamination centers are being activated, direct the Administrative Assistant to notify the NRC, State of Ohio, and local counties on the next Follow-up Notification form (PNPP No. 7795) per <EPI-B1>.

5.2 **Shift Manager** shall:

5.2.1 Perform the actions outlined in Section 5.1 if the TSC is not yet operational, and utilize TSC staff as they become available to accomplish the actions listed in Sections 5.2 thru 5.4.

5.2.2 Activate the applicable pre-recorded "Emergency" message (Attachment 1) on the Exclusion Area Paging (R53) System every five (5) minutes until accountability is completed.

1. Provide additional guidance, if required, to personnel evacuating the site, using the R53 PA feature, for the following:

- designated evacuation routes due to a security contingency
- use of offsite monitoring and decontamination centers

5.2.3 Direct all Control Room staff and Plant Operators (POs) located in the Unit 2 Control Room, to promptly use the designated accountability card readers.

Plant management who are not currently staffing an emergency facility may utilize a Control Room accountability card reader in lieu of evacuation.

5.2.4 If not yet relocated to the OSC, verify the location and status of POs presently dispatched in-plant.

After the OSC is operational, shift personnel such as the Shift I&C/HP/Chemistry Technicians and Plant Operators (POs) will be accounted for through the OSC.

1. Complete Personnel Accountability Checklist (PNPP No. 7957, Attachment 2) to account for on-shift POs outside the Control Room, and forward to the CAS via the Secondary Alarm Station (SAS). <P00073>

5.2.5 Obtain the number of unaccounted for people within the Protected Area from the CAS no later than 30 minutes after accountability was initiated.

PNPP No. 7957 Rev. 2/88

PERSONNEL ACCOUNTABILITY CHECKLIST

Form: EPI-B5-1

Facility:______________________ Date:____________

Time Initiated:______________ Completed:____________

Badge No.	Name	Badge No.	Name

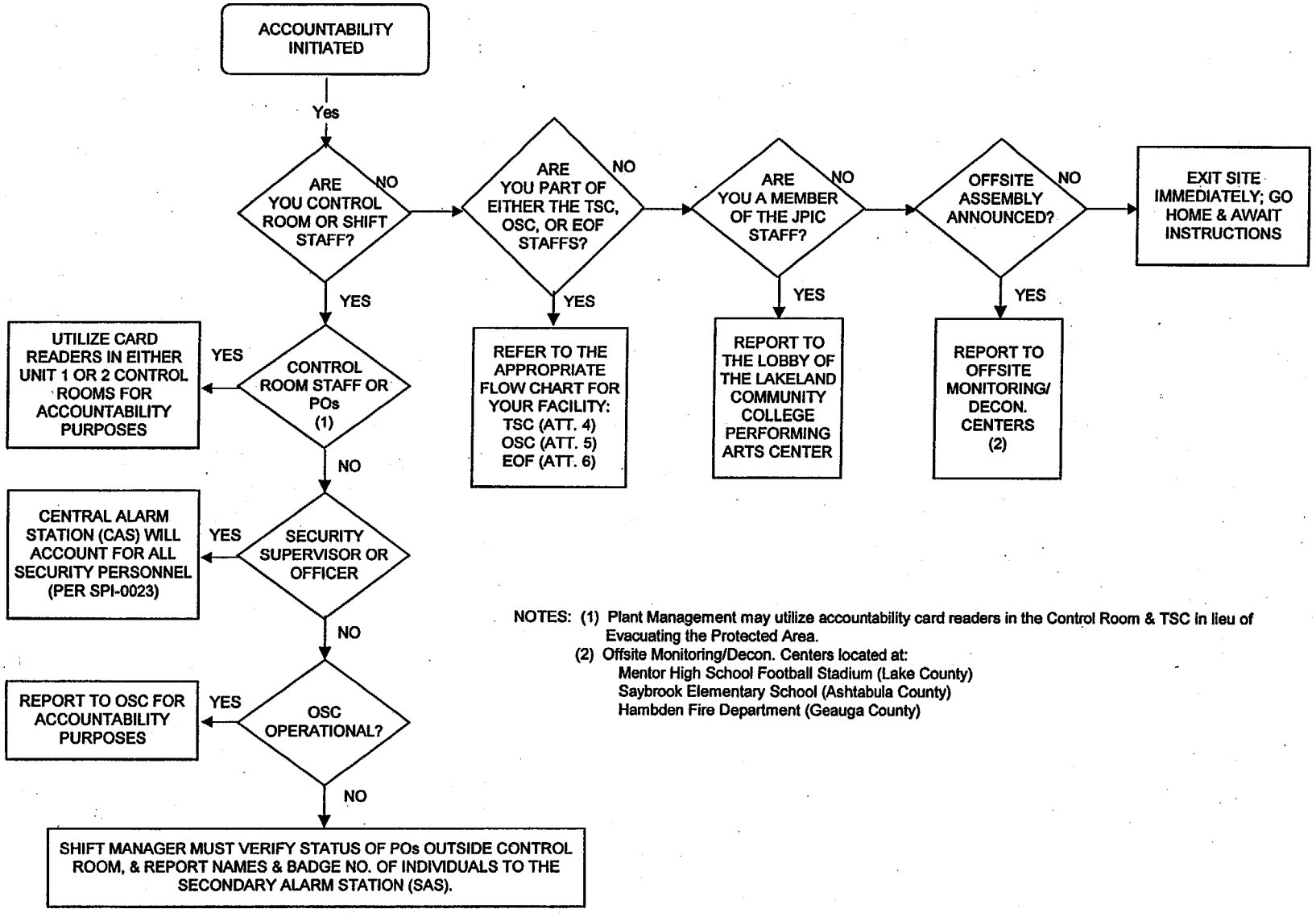
Deliver immediately to CAS when completed!

Page ____ of ____

CONTROL ROOM/SHIFT STAFF & GENERAL SITE ACCOUNTABILITY GUIDELINES

NF972

EPI-B5

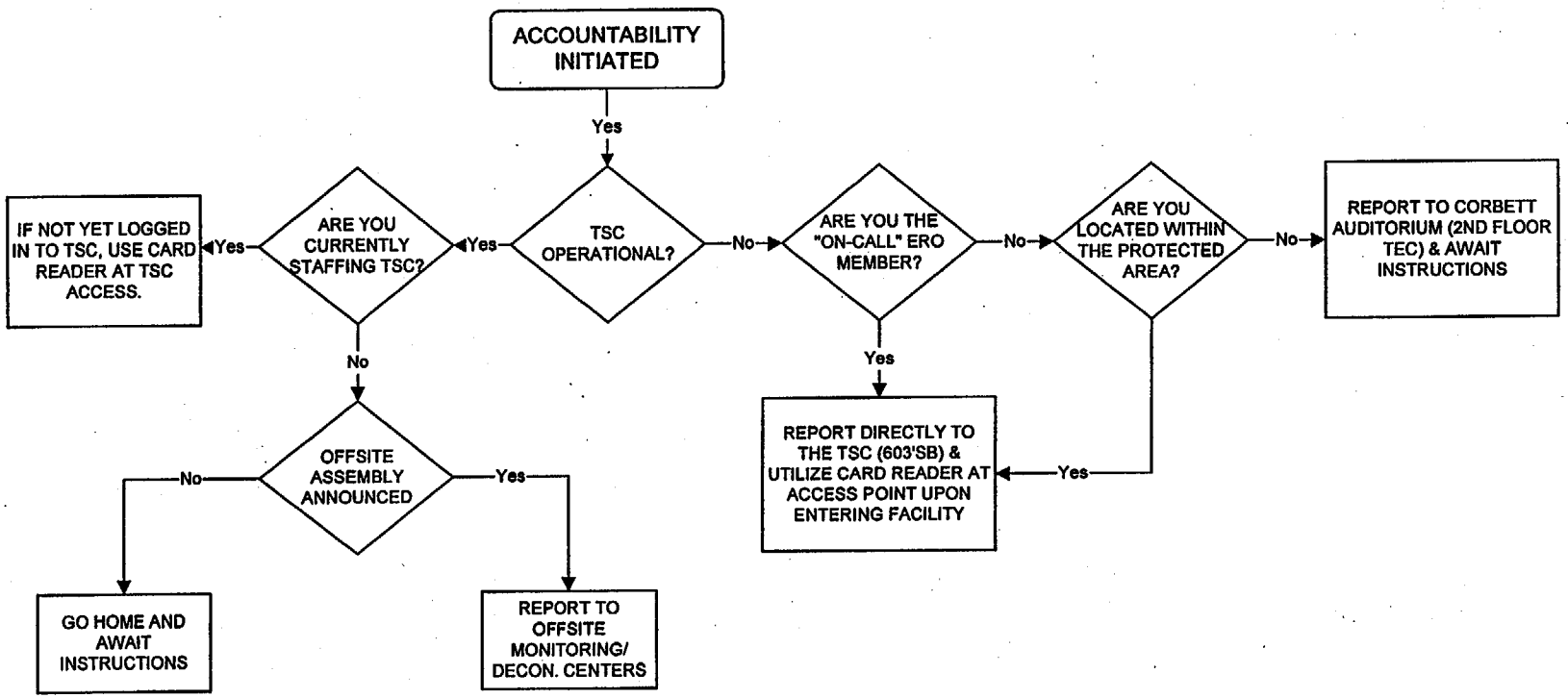


NOTES: (1) Plant Management may utilize accountability card readers in the Control Room & TSC in lieu of Evacuating the Protected Area.

(2) Offsite Monitoring/Decon. Centers located at:
Mentor High School Football Stadium (Lake County)
Saybrook Elementary School (Ashtabula County)
Hambden Fire Department (Geauga County)

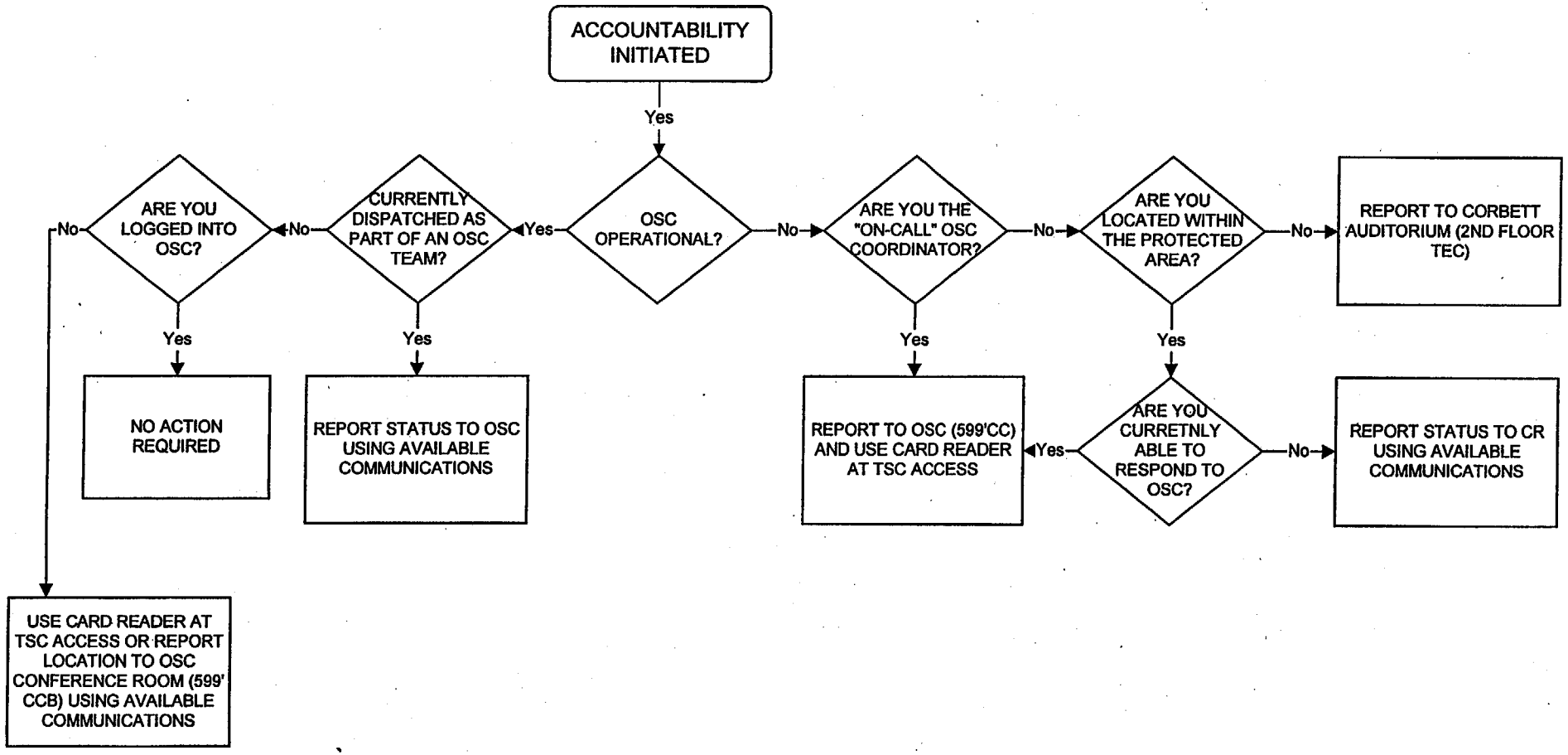
NF975

TSC STAFF ACCOUNTABILITY ACTIONS



NF974

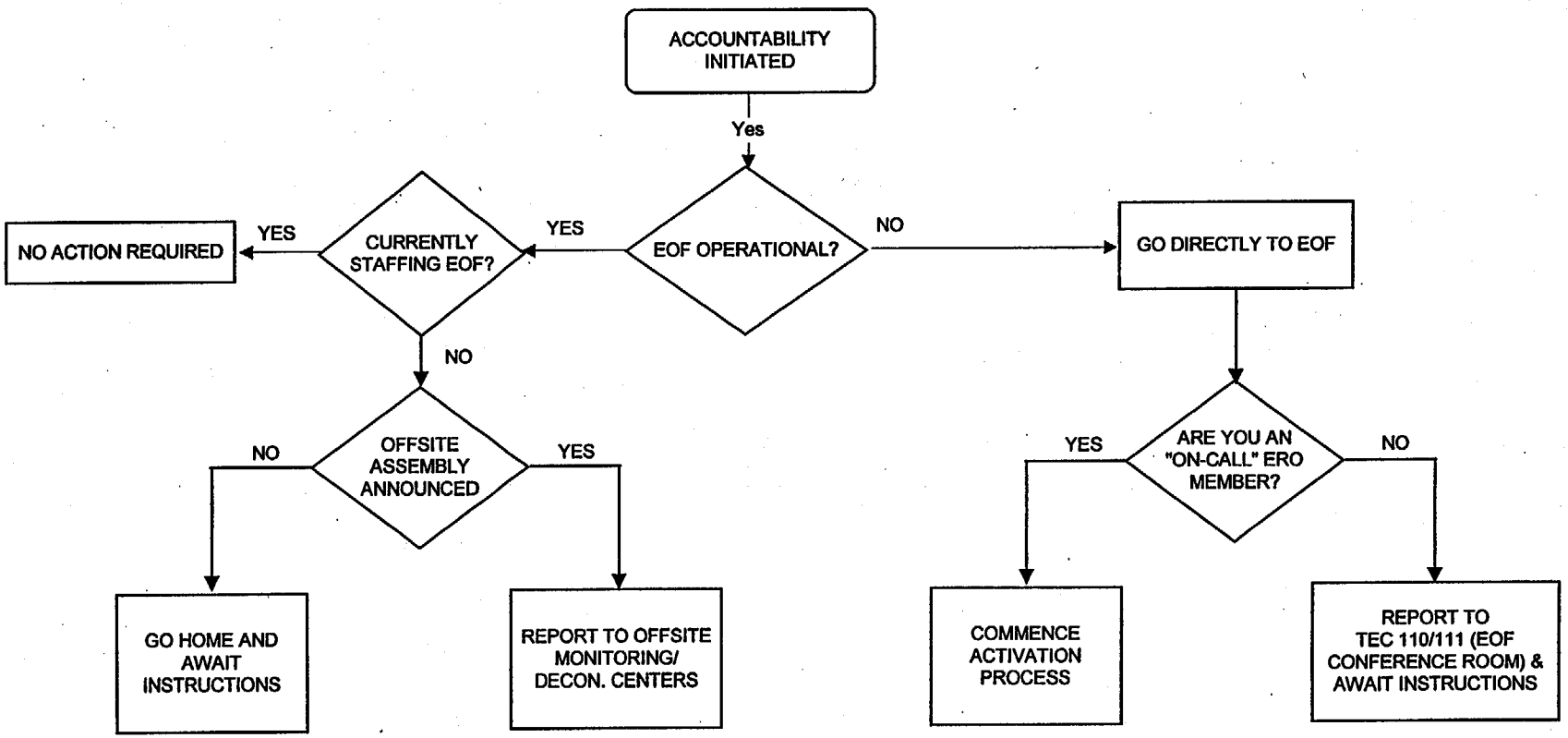
OSC STAFF ACCOUNTABILITY ACTIONS



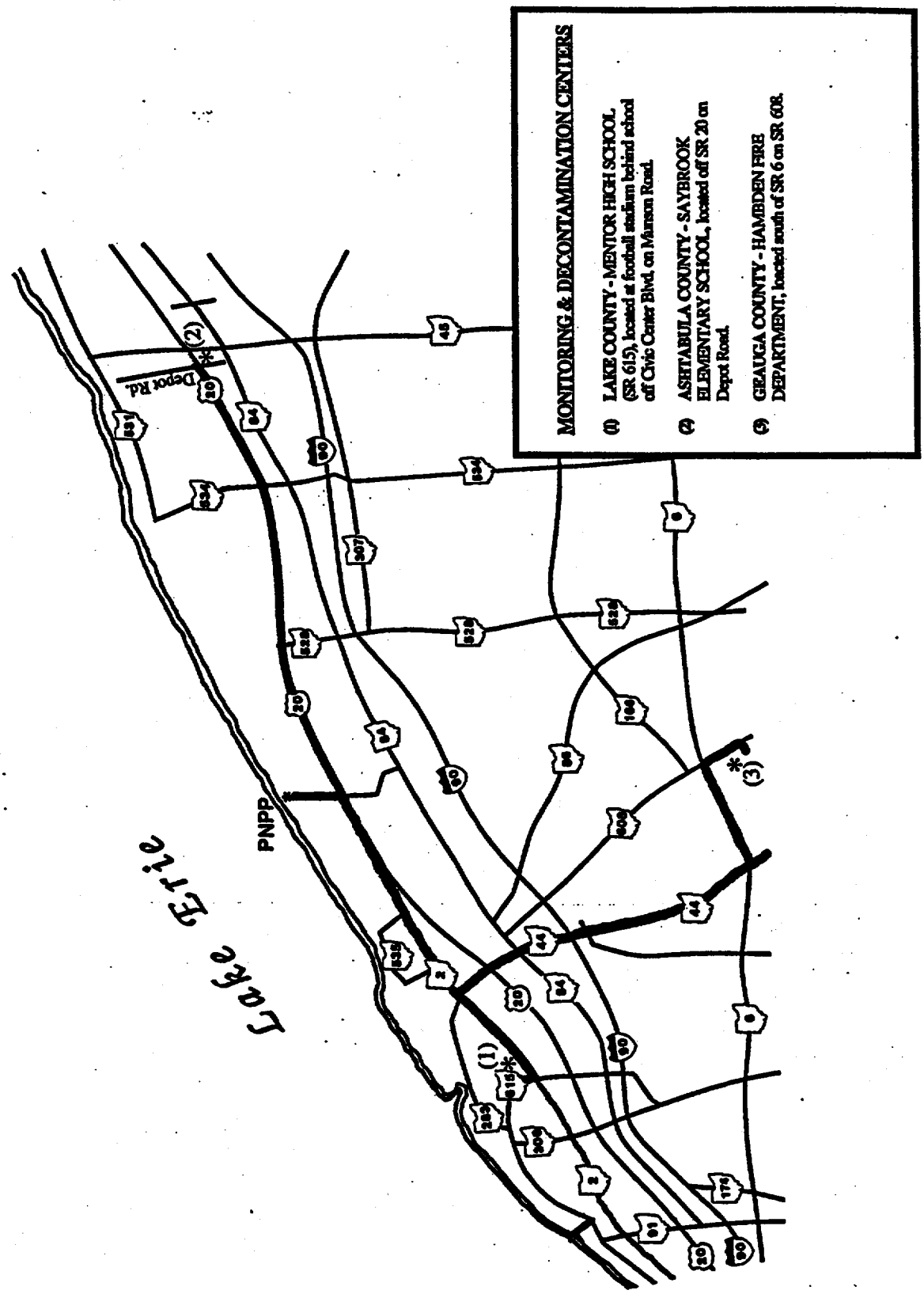
NF973

EOF STAFF ACCOUNTABILITY ACTIONS

EPI-B5



OFFSITE MONITORING & DECONTAMINATION CENTER LOCATIONS



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