

NLS2002061

May 23, 2002

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555-0001

Gentlemen:

Subject: Emergency Plan Implementing Procedures Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Pursuant to the requirements of 10 CFR 50, Appendix E, Section V, "Implementing Procedures," Nebraska Public Power District (NPPD) is transmitting the following Emergency Plan Implementing Procedure (EPIP):

EPIP 5.7.9.1 Revision 3 "Activation of Alternate EOF"

NPPD has determined that this EPIP revision was not transmitted to the NRC as required. This failure has been entered into the corrective action program. This EPIP, 5.7.9.1 Revision 3, has been superceded by subsequent revisions, therefore, this revision should not be filed as an active procedure.

Should you have any questions concerning this matter, please contact me at (402) 825-5233.

Sincerely Hutton

Plant Manager

/cb Enclosure

cc: Regional Administrator w/enclosure (2) USNRC - Region IV

Senior Resident Inspector w/enclosure USNRC

NPG Distribution w/o enclosure

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ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS

Correspondence Number: <u>NLS2002061</u>

The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described for information only and are not regulatory commitments. Please notify the NL&S Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

	COMMITTED DATE
COMMITMENT	OR OUTAGE
None	

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	CNS OPERATIONS MANUAL EPIP 5.7.9.1	USE: REFERENCE EFFECTIVE: 2/12/01 APPROVAL: SORC
	ACTIVATION OF ALTERNATE EOF	OWNER: J. G. KELSAY DEPARTMENT: EP
		1
1.	PURPOSE	
2.	REQUIREMENTS	
3.	EOF DIRECTOR	
4.	RADIOLOGICAL CONTROL MANAGER	
5.	EOF EMERGENCY PREPAREDNESS COORI	
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υ.		KLIST - AEOF
		CPAREDNESS COORDINATOR
	ATTACHMENT 3 AEOF FLOOR PLAN	

1. PURPOSE

This procedure describes the activation and subsequent operation of the Alternate Emergency Operations Facility (AEOF) in the event that the normal Emergency Operations Facility (EOF) cannot be activated or becomes uninhabitable during an ALERT, SITE AREA EMERGENCY, or GENERAL EMERGENCY.

INFORMATION SHEET7

2. **REQUIREMENTS**

ATTACHMENT 4

2.1 The EOF cannot be activated in its normal location or it has been determined to be uninhabitable.

3. EOF DIRECTOR

3.1 EOF Director shall ensure items listed on Attachment 1 are completed.

4. RADIOLOGICAL CONTROL MANAGER

- 4.1 Radiological Control Manager shall determine the relocation route to be taken to the AEOF, based on radiological survey data and consistent with ALARA principles, as to avoid any excess radiation doses. This route shall be communicated clearly to all personnel who are relocating.
- 4.2 Radiological Control Manager shall utilize Procedures 5.7.11 and 5.7.13, if necessary, during facility relocation.

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5. EOF EMERGENCY PREPAREDNESS COORDINATOR

5.1 EOF EPC shall ensure items listed on Attachment 2 are completed.

6. EOF PERSONNEL

- 6.1 EOF personnel shall relocate in an orderly fashion to the AEOF when instructed to do so, using the specified route. Personnel shall take with them all written logs, portable radios, calculators, communication headsets, personnel protection and safety equipment that has been issued to them, and any other EOF equipment necessary to perform their EOF duties from the AEOF. If instructed by the Radiological Control Manager or EOF Director, EOF personnel shall obtain their TLD prior to relocating to the AEOF.
- 6.2 All EOF personnel shall perform their duties from the AEOF in the same manner that they would from the normal EOF utilizing this and all other appropriate procedures. EOF staff members shall assist the EOF EPC in facility relocation and set-up tasks if requested to do so by the EOF Director or EOF EPC.

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ATTACHMENT 1 EOF DIRECTOR CHECKLIST - AEOF

ACTION ITEMS

- 1. Notify EOF personnel of the decision to relocate the EOF, the reasons for relocation, and any specific information and instructions about the relocation effort. Instruct EOF personnel to obtain their TLD if this action has been deemed appropriate by the Radiological Control Manager.
- 2. Contact the TSC and notify TSC Director of the decision to relocate the EOF. Make arrangements for temporary turnover of EOF duties to the TSC during the relocation process.
- 3. Notify Local, State, and Federal Agency Representatives present in the EOF of the relocation decision.
- 4. Make arrangements with State and Local Agencies for the AEOF (Nemaha County Multiplex Building) to be unlocked (if not currently occupied or keys to the facility are not available from the EOF EPC PIM Manual) and made accessible to EOF personnel.
- 5. Request EOF Logistics Coordinator to coordinate the use of station vehicles for the transfer of personnel and equipment to the alternate facility.
- 6. Provide EOF EPC with the necessary resources (authority and manpower) for the transfer, set-up, and preparation of equipment in the alternate facility.

	TIME/INITIALS
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ACTION ITEMS

TIME/INITIALS

- 1. Ensure at least the following equipment is transferred from the EOF to the AEOF during relocation:
 - 1.1 One IDT (Information Display Terminal).
 - 1.2 One printer for the IDT.
 - 1.3 One Laserjet printer.
 - 1.4 One fax machine.
 - 1.5 One VT-220 display terminal.
- 2. Set up telephones, radios, and computer communications.

2.1	The telephones and radios are located on shelves in the
	equipment storage room at the east end of the AEOF.
	Ensure this room has been unlocked per Attachment 1,
	Step 4, if keys are not available from the EOF EPC
	PIM Manual.

- 2.2 Set up the tables in the configuration shown on Attachment 3. The tables are located in the equipment storage room at the east end of the AEOF.
- 2.3 Obtain telephones and base radio units from the equipment storage room and place on the tables. These telephones and radios are labeled by ERO position. Place them at the locations identified for the respective ERO positions per Attachment 3.
- 2.4 Drop the telephone cords under the tables to the terminal blocks located on the north and west walls and plug them into the jacks that are labeled for each respective unit. The same applies to the base radio units which are similarly labeled.

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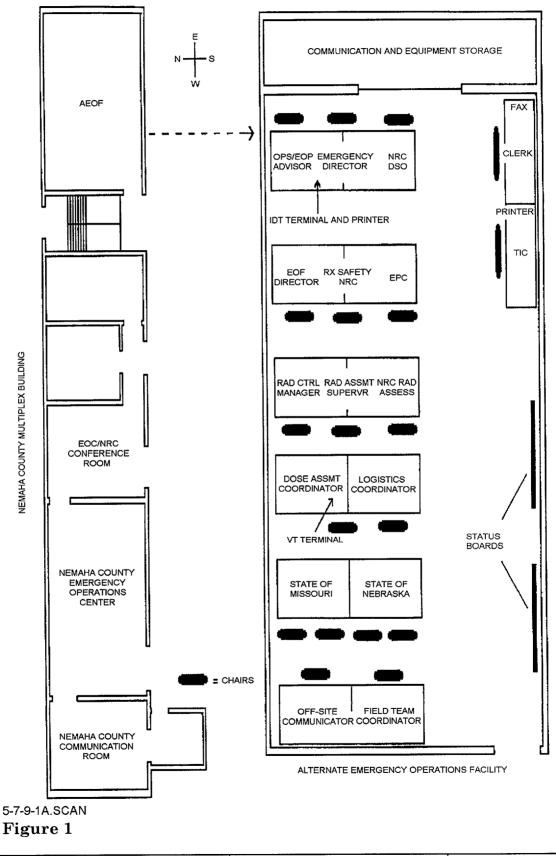
ACTION ITEMS

TIME/INITIALS

	2.5	Check each device for operation (dial tone or radio check). If any device is inoperable, check cable connections and jacks. Note any unwanted line noise or other unsatisfactory conditions and request assistance from the CNS Communications Department, if necessary.	/
3.	STAT	TUS BOARDS AND EPZ MAP SET-UP	
	3.1	Locate status boards and maps in the equipment storage room. Relocate them to the main AEOF area.	/
	3.2	Position status boards in AEOF per Attachment 3.	/
	3.3	Position EPZ maps, as necessary, for easy access and use.	/
4.	COM	PUTER TERMINAL SET-UP	
	4.1	Place IDT terminal, IDT printer, VT220 display terminal, and Laserjet printer, at locations specified on Attachment 3.	/
	4.2	Drop the terminal cords under the tables to the terminal blocks located on the north and west walls and plug them into the jacks that are labeled for each respective unit.	/
	4.3	Check each device for operation. If any device is inoperable, check cable connections. Note any unsatisfactory conditions and request assistance from the Communications Department Technicians, if necessary.	/

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ATTACHMENT 3 AEOF FLOOR PLAN



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1. DISCUSSION

- 1.1 If emergency conditions dictate relocation of the EOF, off-site emergency response shall be accomplished from the AEOF. The decision to relocate the EOF to the alternate facility shall be made by the EOF Director.
- 1.2 Activation and operational criteria of the AEOF is identical to that of the EOF as specified in Procedure 5.7.9. EOF personnel shall perform the same duties, as prescribed by the same appropriate procedures, from the AEOF as they would from the normal EOF.
- 1.3 AEOF is located in the northeast portion of the Nemaha County Multiplex Building located at 601 "J" Street, Auburn, Nebraska. The AEOF is equipped with emergency response equipment and emergency communications equipment which shall be activated per Attachment 2.
- 1.4 EOF Director shall be responsible for the implementation of this procedure and shall be assisted by the EOF Emergency Preparedness Coordinator (EPC) and EOF Logistics Coordinator. The EOF Logistics Coordinator shall coordinate station vehicles for the transfer of personnel and equipment to the alternate facility. The EOF EPC shall be responsible for the transfer, set-up, and preparation of equipment. The EOF Director shall ensure EOF EPC has enough manpower at his disposal to implement this procedure. By effectively utilizing all EOF staff, tasks defined in this procedure can be performed simultaneously for more efficient and timely facility activation.
- 1.5 A list of emergency equipment located in the AEOF and instructions for maintaining readiness of the equipment are detailed in Procedure 5.7.21.

2. **REFERENCES**

- 2.1 CODES AND STANDARDS
 - 2.1.1 NPPD Emergency Plan for CNS.
 - 2.1.2 NUREG 0654, Revision 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.

2.2 PROCEDURES

2.2.1 Emergency Plan Implementing Procedure 5.7.1, Emergency Classification.

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ATTACHMENT 4 INFORMATION SHEET

- 2.2.2 Emergency Plan Implementing Procedure 5.7.9, Activation of EOF.
- 2.2.3 Emergency Plan Implementing Procedure 5.7.11, Evacuation of Non-Designated Site Personnel.
- 2.2.4 Emergency Plan Implementing Procedure 5.7.13, Personnel Monitoring and Decontamination.
- 2.2.5 Emergency Plan Implementing Procedure 5.7.21, Emergency Equipment Inventory.
- 2.2.6 Emergency Plan Implementing Procedure 5.7.22, Communications.
- 2.3 MISCELLANEOUS
 - 2.3.1 QA Audit 93-05.

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