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10CFR50, Appendix E

June 20, 2002

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001

Subject: Peach Bottom Atomic Power Station, Units 2 & 3 Facility Operating License Nos. DPR-44 and DPR-56 NRC Docket Nos. 50-277 and 50-278

> ERP-620, Revision 13, "Health Physics Group" ERP-205, Revision 11, "Emergency Preparedness Coordinator/TSC" ERP-200, Appendix 1, Revision 6, "Emergency Director Checklist (MCR)" ERP-140, Revision 20, "Emergency Response Organization (ERO) Call Out" ERP-110, Appendix 1, Revision 58, "Emergency Notification Telephone List"

Dear Sir/Madam:

Enclosed are revised Emergency Response Procedures (ERPs) for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, which have been recently revised. The revisions are contained in Attachment 1. These procedures are required to be submitted within thirty (30) days of their revision in accordance with 10CFR50, Appendix E, and 10CFR50.4.

In accordance with 10CFR2.790(a)(6), we request that Appendix ERP-110-1, "Emergency Notification Telephone List" (i.e., page 3) be withheld from public disclosure since it contains names and phone numbers, and disclosure of this information would constitute an unwarranted invasion of personal privacy of the individuals involved. Attachment 2 contains Revision 58 of Appendix ERP-110-1 with this sensitive information excluded.

Also, enclosed as Attachment 3, is a copy of a computer generated report index identifying the latest revisions of the PBAPS ERPs.

Emergency Response Procedures June 20, 2002 Page 2

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

9. J. Heller / For

M. P. Gallagher Director - Licensing & Regulatory Affairs Mid-Atlantic Regional Operating Group

Enclosures

cc: H. J. Miller, Administrator, Region I, USNRC (2 copies) A. C. McMurtray, USNRC Senior Resident Inspector, PBAPS

# **ATTACHMENT 1**

## **PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 & 3**

Docket Nos. 50-277 50-278

License Nos. DPR-44 DPR-56

## **EMERGENCY RESPONSE PROCEDURE**

ERP-620, "Health Physics Group" Revision 13

ERP-205, "Emergency Preparedness Coordinator/TSC" Revision 11

ERP-200, Appendix 1, "Emergency Director Checklist (MCR)" Revision 6

ERP-140, "Emergency Response Organization (ERO) Call Out" Revision 20

ERP-110, Appendix 1, "Emergency Notification Telephone List" Revision 58 (Sensitive Information Included)

Effective Date: 6/21/02

4

ERP-620 Rev 13 Page 1 of 14 SLW:aa

### PECO NUCLEAR PEACH BOTTOM UNITS 2 AND 3 EMERGENCY RESPONSE PROCEDURE

#### ERP-620 HEALTH PHYSICS GROUP

- 1.0 RESPONSIBILITIES
  - 1.1 Health Physics Group Leader (HPGL)
    - 1.1.1 Supports directives of the Operations Support Center (OSC) Director <u>AND</u> Health Physics Team Leader (HPTL).
    - 1.1.2 Directs activities of Health Physics Group members.
    - 1.1.3 Coordinates accident mitigation actions with the Operations Group Leader (OGL) and Maintenance Team Leader (MTL).
    - 1.1.4 Keeps OSC Director apprised of Health Physics group status and activities.
    - 1.1.5 Ensures timely relief of Health Physics Group Members.
    - 1.1.6 Ensures radiological exposure tracking for personnel in the OSC.
    - 1.1.7 Ensures facilities habitability evaluations are performed.
  - 1.2 Health Physics Group Members (HPGM)
    - 1.2.1 Performs OSC activation activities in accordance with ERP-230 AND as directed by HPGL.
    - 1.2.2 Conducts plant surveys <u>AND</u> provides Health Physics (HP) coverage as directed by HPGL.
    - 1.2.3 Performs HP functions assigned by the HPGL.

#### 2.0 INITIAL ACTIONS

### 2.1 HPGL shall:

- 2.1.1 Report to the OSC.
- 2.1.2 Direct HP OSC activation actions per ERP-230.
- 2.1.3 Request plant status from the OSC Director.
- 2.1.4 Request initial response requirements from the HPTL.
  - 2.1.4.1 Determine proper evacuation assembly area, based on current meteorological conditions, should an evacuation become necessary.
  - 2.1.4.2 Identify any known radiological hazards.

### NOTE:

ADDITIONAL HEALTH PHYSICS INSTRUMENTATION SHOULD BE OBTAINED, AS NEEDED, FROM THE HEALTH PHYSICS INSTRUMENT AREA PRIOR TO PLANT CONDITIONS DEGRADING. THE EQUIPMENT SHOULD BE RELOCATED TO THE OSC OR OTHER STABLE PLANT AREA.

- 2.1.5 Assign HPGM(s) to:
  - 2.1.5.1 Staff field survey team(s).(Initially assign one group member to report to the TSC. Assign additional group members as requested by the HPTL).
  - 2.1.5.2 Staff OSC Team Check Point.
  - 2.1.5.3 Maintain Area Radiation Monitor (ARM) status.
  - 2.1.5.4 Conduct habitability surveys as necessary.
    - a. Control Room
    - b. Plant Entrance And Radiological Laboratory (PEARL)
    - c. OSC
    - d. Guard House
    - e. Secondary Alarm Station (SAS)
  - 2.1.5.5 Initiate set up of the evacuation assembly area in accordance with ERP-640.

ERP-620, Rev. 13 Page 3 of 14

- 2.1.6 Notify HPTL AND OSC Director:
  - 2.1.6.1 HP Technicians available for assignment.
  - 2.1.6.2 Results of initial habitability surveys.
- 2.2 Group member assigned to OSC Team Check Point.
  - 2.2.1 Set up two PIMS terminals and verify a PIMS RWP record for responding to emergencies exists OR create a new record.
  - 2.2.2 Set up RADOS readers and verify operability.
- 2.3 Group member assigned as ARM Status Keeper shall:
  - 2.3.1 Obtain current ARM status via the Plant Monitoring System (PMS), fax from the Technical Support Center(TSC) <u>OR</u> verbally from Control Room (CR).
- 2.4 Plant Survey Group members conducting habitability surveys shall:
  - 2.4.1 Complete Attachment 1 "Health Physics Habitability Check-Off List".
    - 2.4.1.1 Enter results on ERP-620, Appendix 1 "Habitability Status Log Sheet".
    - 2.4.1.2 Report results to HPGL.
- 3.0 CONTINUING ACTIONS

NOTE :						
1.	TO THE EXTENT PRACTICABLE, PLANT HEALTH PHYSICS PROCEDURES WILL BE UTILIZED.					
2.	NORMAL REQUIREMENTS OF HP-C-310, ACCESS CONTROL PROGRAM, ARE WAIVED.					
3.	HEALTH PHYSICS ESCORT REQUIREMENTS MAY BE WAIVED IF THE FOLLOWING CONDITIONS ARE MET:					
	a. THE ENTRY IS OF SHORT DURATION AND WELL DEFINED IN TERMS OF RADIOLOGICAL HAZARD, LOCATION AND WORK TO BE PERFORMED;					
	b. EXPOSURE RATES ARE LESS THAN 100 MR/HR.					

- 4. A FILTER RESPIRATOR MAY BE SUBSTITUTED FOR A SELF CONTAINED BREATHING APPARATUS(SCBA) IF IT IS KNOWN THAT HIGH RADIOIODINE LEVELS ARE NOT PRESENT AND AREA IS NOT IMMEDIATELY DANGEROUS TO LIFE AND HEALTH(IDLH) OR THE USE OF A SCBA WOULD PHYSICALLY RESTRICT ENTRY INTO THE AREA.
  - 5. IF A SCBA IS NOT USED DUE TO PHYSICAL ACCESS RESTRICTIONS AND RADIO-IODINE IS KNOWN OR SUSPECTED TO BE PRESENT, THYROID BLOCKING AGENT SHOULD BE EVALUATED IN ACCORDANCE WITH ERP-680, CONTROL OF THYROID BLOCKING POTASSIUM IODIDE (KI) TABLETS.
  - 6. UNLESS SPECIFIC NEEDS DICTATE, IN-PLANT RADIATION SURVEYS SHOULD BE CONDUCTED IN CONJUNCTION WITH ENTRIES PERFORMED FOR OTHER PURPOSES. AREA RADIATION MONITOR READINGS SHOULD BE USED IN LIEU OF PRE-ENTRY SURVEYS WHENEVER POSSIBLE.
  - 7. A MINIMUM OF TWO PEOPLE WILL BE ASSIGNED TO AN ENTRY TEAM AND AT NO TIME WILL ANYONE BE ALLOWED TO TRAVEL THROUGH OR REMAIN IN A POTENTIALLY HIGH RADIATION AREA OR OTHERWISE HAZARDOUS AREA UNLESS THEY ARE WITHIN SIGHT OF ANOTHER TEAM MEMBER. (Ref. 6.5.1) **CM-1**

#### CAUTION

UNTIL IT HAS BEEN OTHERWISE CONFIRMED, AIRBORNE RADIOIODINE ACTIVITY SHOULD BE ASSUMED TO BE PRESENT IN ALL AFFECTED AREAS OF THE PLANT

- 3.1 HPGL shall:
  - 3.1.1 Ensure a log of Health Physics group activities is kept.
  - 3.1.2 **IF** an entry is required into a high radiation <u>OR</u> airborne radioactivity area, <u>THEN</u> discuss the entry with the HPTL using Attachment 3, "Health Physics Considerations" as a quide.
  - 3.1.3 **IF** non-radiological hazards are expected, <u>THEN</u> request HPTL to obtain guidance from Industrial Risk Management representative.
  - 3.1.4 Direct surveys to be conducted <u>OR</u> assign HP coverage to support OSC Director directives.
    - 3.1.4.1 Advise HPGM assigned to survey or repair squad of current radiological conditions.

- 3.1.4.2 Specify protective measures using ERP-620, Appendix 3, "Health Physics Briefing Guide".
- 3.1.4.3 <u>IF</u> exposure exceeding Administrative limits is expected, <u>THEN</u> request Emergency Radiation Exposure Limits authorization through HPTL.
- 3.1.4.4 Establish communication with HPGM(s).
- 3.1.5 Dispatch teams to perform surveys in-plant <u>OR</u> on-site.
- 3.1.6 Dispatch group members to provide HP coverage for emergency repair teams.
- 3.1.7 Direct all teams to stop at OSC Team Check Point before leaving the OSC.
- 3.1.8 Keep apprised of status of survey and repair squads.
- 3.1.9 **IF** radiological conditions change that impact survey or repair teams, **THEN** notify affected HPGM.
- 3.1.10 WHEN teams return to OSC THEN:
  - 3.1.10.1 Ensure team notified the OSC Team Check Point
  - 3.1.10.2 Obtain debriefing from HPGM including latest survey results
  - 3.1.10.3 Log personnel status on HP Personnel Status Board.
- 3.1.11 Report radiological <u>AND</u> personnel exposure status to HPTL.
- 3.1.12 Evaluate survey results AND ARM reading trends.
- 3.1.13 Direct establishment of contamination control points <u>AND</u> radiation postings.
- 3.1.14 Periodically review OSC personnel exposure status.

ERP-620, Rev. 13 Page 6 of 14

- 3.1.14.1 **IF** Administrative limit may be exceeded, **THEN** request approval for emergency dose extension authorization through HPTL.
- 3.1.14.2 **IF** NRC limits may be exceeded **THEN** request emergency exposure authorization through HPTL.
- 3.1.15 Evaluate emergency facility habitability using Attachment 2, "Habitability Guidelines - Essential Facilities".
  - 3.1.15.1 Establish frequency for habitability surveys as necessary.
- 3.1.16 Keep HPTL apprised of survey results.
- 3.1.17 Coordinate accident mitigation actions with OSC Director.
- 3.1.18 <u>IF</u> contaminated injured must be sent to hospital, <u>THEN</u> assign an HP Technician to escort injured in ambulance <u>AND</u> an HP Technician to provide contamination control at hospital.
- 3.1.19 Ensure OSC personnel are periodically briefed on plant radiological conditions.
- 3.1.20 <u>IF</u> accident conditions appear long term, <u>THEN</u> request HPTL provide relief personnel.
- 3.1.21 <u>IF</u> additional personnel are required, <u>THEN</u> request from HPTL.
- 3.1.22 **IF** OSC becomes uninhabitable, <u>THEN</u> move Health Physics group to Backup OSC per ERP-230.
- 3.1.23 **IF** required to leave OSC temporarily, <u>**THEN**</u> delegate duties to the ARM Status Keeper.
- 3.1.24 **IF** Vehicle and Evacuee Control Group is requested by the HPTL, <u>THEN</u> ensure a HPGM is assigned as a group leader for the Vehicle and Evacuee Control Group <u>AND</u> actions required per ERP-640 are initiated.

- 3.2 Group members staffing the OSC Team Check Point shall:
  - 3.2.1 Check with each individual and/or team leaving the OSC to verify:
    - 3.2.1.1 Team number assigned
    - 3.2.1.2 Job briefing completed
    - 3.2.1.3 Radiological briefing completed <u>AND</u> most recent radiological conditions considered
  - 3.2.2 Verify, for each individual, exposure balance and respirator qualifications.
  - 3.2.3 **IF** PIMS is unavailable, **THEN** obtain most recent respiratory protection and exposure printout for each person.
    - 3.2.3.1 Ensure repair team members assigned to job tasks requiring respiratory protection are qualified for specified equipment.
    - 3.2.3.2 Maintain entries on "Personnel Exposure Record Log" for each person.
  - 3.2.4 Advise HPGL the time each team exits OSC <u>AND</u> log exit on attachment 4, "OSC Team Tracking Log".
  - 3.2.5 Ensure OSC Personnel exposure records are updated.
  - 3.2.6 **IF** OSC personnel approach exposure limits, **THEN** notify HPGL.
- 3.3 ARM Status Keeper shall:
  - 3.3.1 Obtain ARM readings AND log if necessary.
    - 3.3.1.1 **IF** hardcopy data is unavailable, <u>THEN</u> record on ERP-620, Appendix 2, "ARM Status Log".
  - 3.3.2 Inform HPGL of significant changes <u>OR</u> trends noted.
  - 3.3.3 Update Reactor Building <u>AND</u> Turbine Building floor plan maps as necessary.

- 3.4 Health Physics Group Members providing survey AND HP coverage shall:
  - 3.4.1 Provide pre-entry briefings to other team members as required using ERP-620, Appendix 3, "Health Physics Briefing Guide".
  - 3.4.2 Log out at OSC Team Check Point.
  - 3.4.3 Make entry <u>AND</u> perform continuous dose rate surveys.
    - 3.4.3.1 **IF** radiation measurements exceeds limits set by HPGL <u>OR</u> range of instrument, <u>THEN</u> return to low radiation area <u>AND</u> notify HPGL.
  - 3.4.4 <u>WHEN</u> entry task is completed, <u>THEN</u>:
    - 3.4.4.1 Provide exposure data to HP at OSC Team Check Point.
    - 3.4.4.2 Provide debriefing to HPGL.
    - 3.4.4.3 Record survey results <u>AND</u> abnormal plant conditions on survey forms.
  - 3.4.5 Submit survey forms to HPGL.
- 3.5 Health Physics Group Members conducting habitability surveys shall:
  - 3.5.1 Conduct habitability surveys in facilities with changing conditions as indicated by instrument alarms.
  - 3.5.2 Upon notification of alarms:
    - 3.5.2.1 Proceed to the affected facility.
    - 3.5.2.2 Take action to mitigate the effects of any condition impacting on the immediate health and safety of personnel occupying the effected facility.
  - 3.5.3 Conduct surveys at frequency specified by Health Physics Group Leader.
  - 3.5.4 Report results to each facilities lead person <u>AND</u> the Health Physics Group Leader.
  - 3.5.5 Record results on plant survey forms AND Habitability Status Log.

ERP-620, Rev. 13 Page 9 of 14

#### 4.0 FINAL CONDITIONS

- 4.1 HPTL directs HPGL to deactivate Health Physics group.
  - 4.1.1 Implement OSC deactivation per ERP-230.
- 4.2 Health Physics Group Members implement OSC deactivation actions as directed by Health Physics Group Leader.
- 5.0 ATTACHMENTS AND APPENDICES
  - 5.1 Attachment 1 "Habitability Check-Off List"
  - 5.2 Attachment 2 "Habitability Guidelines Essential Facilities"
  - 5.3 Attachment 3 "Health Physics Considerations"
  - 5.4 Attachment 4 "OSC Team Tracking Log"
  - 5.5 Appendix 1 "Habitability Status Log Sheet"
  - 5.6 Appendix 2 "ARM Status Log"
  - 5.7 Appendix 3 "Health Physics Briefing Guide"

#### 6.0 SUPPORTING INFORMATION

6.1 PURPOSE

Establish actions for HPGL and HPGMs required during an emergency response.

6.2 CRITERIA FOR USE

HPGM(s) will be activated when an event has been classified as an Alert or higher, or at the discretion of the Emergency Director (ED).

6.3 SPECIAL EQUIPMENT

6.3.1 None

#### 6.4 REFERENCES

- 6.4.1 Code of Federal Regulations, Title 10, Energy, Part 20, Standards for Protection Against Radiation
- 6.4.2 ERP-230, "Activation of Operations Support Center (OSC)"
- 6.4.3 ERP-600, "Health Physics Team Leader (HPTL)"
- 6.4.4 ERP-640, "Vehicle and Evacuee Control Group"

- 6.4.5 ERP-670, "Emergency Radiation Exposure Guidelines and Controls"
- 6.4.6 HP-C-105, "Respiratory Protection Program"
- 6.4.7 HP-C-310, "Access Control Program"
- 6.4.8 NUREG 0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants"
- 6.4.9 NUREG 0696, "Functional Criteria for Emergency Response Facilities"
- 6.4.10 Nuclear Emergency Plan
- 6.5 COMMITMENT ANNOTATION

6.5.1 CM-1, Letter from NRC, 9/12/83 (T03154) (Ref. Section 3.0 Note)

ERP-620, Rev. 13 Page 11 of 14

#### ATTACHMENT 1

### HEALTH PHYSICS HABITABILITY CHECK-OFF LIST (Page 1 of 1)

HP Technician

Date

- At each facility: 1.
  - Perform initial radiation and contamination surveys as Α. necessary.
  - Initiate operation of habitability monitoring equipment Β. to include setting of alarm set point valves.

NOTE:

INITIATING OPERATION REQUIRES PHYSICAL INSPECTIONS, CALIBRATION VERIFICATION, AND RESPONSE CHECKS AS APPROPRIATE. EQUIVALENT INSTRUMENTATION MAY BE SUBSTITUTED.

Set EC4-X alarms at 50 mR/hr and 500 mR/hr unless C. otherwise directed by Health Physics Group Leader.

NOTE:

AN INCREASE IN DETECTED ACTIVITY ON RM-14'S CAN RESULT FROM INCREASED AIRBORNE CONTAMINATION LEVELS, INCREASED RADIATION LEVELS OR BOTH. IF AN INCREASE IS DETECTED, AIR SAMPLING SHOULD BE PERFORMED TO DETERMINE THE CAUSE.

Time/Facility Leader 2. Facilities and equipment Control Room (entrances) Α. 1. RM-14 Β. PEARL Chemistry Count Room 1. RM-14 - Counting Room 2. EC4-X - or equivalent OSC Cabinet & Closet C. 1. RM-14 2. EC4-X - or equivalent Guard House (CAS) D. 1. RM-14 2. EC4-X - or equivalent Secondary Alarm Station (SAS) Ε. 1. RM-14 2. EC4-X - or equivalent

ERP-620, Rev. 13 Page 12 of 14

### ATTACHMENT 2

### HABITABILITY GUIDELINES ESSENTIAL FACILITIES

RADIATION	ALERT	ACTION
Gamma Radiation (Whole Body)	50 mR/hour	500 mR/hour
Noble Gas	6 DACs	50 DACs
(X3-133)	6N4 µCi/cc	5N3 µCi/cc
Particulate B-G	6 DACS	50 DACs
(Unidentified count)	1.8N8 µCi/cc	1.5N7 μCi/cc
Iodine	6 DACs	50 DACs
(I-131)	1.2N7 µCi/cc	1N6 µCi/cc

### Values are approximate

### ATTACHMENT 3 HEALTH PHYSICS CONSIDERATIONS (Page 1 of 1)

### NOTE:

IN ADDITION TO ERP-620, THE FOLLOWING LIST IS INTENDED ONLY TO GUIDE THE PLANNER IN OPTIONS TO CONSIDER, AND DOES NOT ESTABLISH REQUIREMENTS.

I. Access Control

- 1. Are transit doses considered, including possible plume exposure?
- 2. Are barriers and postings in place?
- 3. Are emergency exit points available?
- II. Surveillance
  - 1. Has ARM data been reviewed?
  - 2. Is alpha surveillance necessary based on fuel damage?
  - 4. Are there non-radiological hazards?
- III. Exposure Control
  - 1. Are exposure limits being established for each job?
  - 2. Has shallow dose exposure rated been evaluated against deep dose exposure rates to determine limiting dose factor (beta/gamma ratio)?
  - 3. Is there exposure due to high energy beta radiation?
- IV. Equipment
  - 1. <u>Instrumentation</u>
    - a. Type of survey instrumentation
    - b. High energy beta radiation effects on instrument
    - c. Noble gas contamination of instrument
    - d. Alpha contamination
  - 2. <u>Air Sampling</u>
    - a. Appropriate sample media (charcoal or silver zeolite)
    - b. High activity buildup on sample media
    - c. Evaluation for pure beta/alpha activity

ERP-620, Rev. 13 Page 14 of 14

### ATTACHMENT 4

## OSC TEAM TRACKING LOG

Team #	Location	Job	Time Out	Time In
		· · · · · · · · · · · · · · · · · · ·		

Effective Date: 6/21/02

ERP-205 Rev. 11 Page 1 of 8 CGH/aa

### EXELON NUCLEAR PEACH BOTTOM UNITS 2 AND 3 EMERGENCY RESPONSE PROCEDURE

#### ERP-205 EMERGENCY PREPAREDNESS COORDINATOR/TSC

#### 1.0 RESPONSIBILITIES

- 1.1 The Emergency Preparedness Coordinator/TSC (EPC/TSC) is responsible for the expeditious activation of the Technical Support Center (TSC).
- 1.2 The EPC/TSC is responsible for advising the Emergency Director (ED) and TSC emergency response personnel, on emergency response procedural requirements.
- 1.3 The EPC/TSC is responsible for directing the activities of the Support Services Group.

#### 2.0 INITIAL ACTIONS

- 2.1 Respond to the Unit One Emergency Response Facility.
- 2.2 An EPC/TSC who is not on-call and is fit for duty and available to respond will notify the on-call EPC/TSC and then call the NEROCS system and follow prompts.
- 2.3 Ensure that the Unit One Emergency Facilities are unlocked, including the emergency response equipment room on the first floor.
- 2.4 Proceed to the Ventilation System Panel and activate, using Attachment 1, "Unit 1, Panel P60A, Ventilation Emergency Mode Startup".
  - 2.4.1 Verify that the pressure indicator reads  $\geq$  0.125 inches of water. CM-1

#### NOTE

IF PRESSURE INDICATOR READING IS <0.125, CHECK ALL DOORS ENTERING THE TSC TO ENSURE DOORS ARE TIGHTLY CLOSED.

- 2.5 Complete attachment titled, "TSC Activation Checklist".
  - 2.5.1 Notify the ED when activation is completed.
- 2.6 Review Nuclear Emergency Response Organization Call out System (NEROCS) printouts for unfilled positions.
  - 2.6.1 IF positions remain unfilled 30 minutes after NEROCS activation, THEN ensure/assist calling in the required qualified personnel.
- 2.7 Assign Support Services Group members to perform the following functions:
  - 2.7.1 ED Communicator
  - 2.7.2 Message Router
  - 2.7.3 Nuclear Records Management Operator

#### 3.0 CONTINUING ACTIONS

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- 3.1 Advise the ED on Emergency Response procedural requirements.
- 3.2 Ensure Support Services Group members perform actions required by ERP-206, "Support Services Group" and provide assistance as necessary.
- 3.3 Maintain current log accounts of all actions taken.
- 3.4 Advise response personnel to initiate and maintain current and complete log book entries.
- 3.5 Ensure that status board entries are current and complete.
- 3.6 Ensure that the ED and Team Leaders establish work priorities and plans consistent with changing plant conditions and emergency response procedures.
- 3.7 Monitor communication equipment operations.
  - 3.7.1 IF communication equipment failures are reported THEN ensure timely repair actions are initiated.

- 3.8 Periodically inquire if a NRC Response Team is responding to the TSC.
  - 3.8.1 IF NRC Response Team is responding to the TSC, THEN greet and arrange for an NRC Response Team briefing AND assist and coordinate the setup and activation of the NRC Response Team office.
- 3.9 IF a site evacuation is directed THEN:
  - 3.9.1 Ensure the notifications to off site agencies have been completed per ERP-130.
  - 3.9.2 Advise and assist Security Team Leader with accountability issues.
- 3.10 IF TSC becomes uninhabitable, THEN:
  - 3.10.1 Coordinate AND direct transfer of TSC personnel as directed by the Emergency Director.
- 3.11 Ensure that news releases are reviewed by the ED or designee and comments forwarded to the Emergency News Center.
- 3.12 Advise the ED on recovery phase planning and actions.

#### 4.0 FINAL CONDITIONS

- 4.1 When the ED terminates the emergency event, or de-escalates so as not to require continued facility activation.
  - 4.1.1 Complete attachment titled, "TSC Closeout Checklist".
  - 4.1.2 Ensure that log books, transmittals and forms are retained for future review.
- 4.2 After the facility is deactivated.
  - 4.2.1 Schedule inventory of supplies and equipment.
  - 4.2.2 Initiate actions required for restocking of supplies.
  - 4.2.3 Ensure that the TSC facility is secured.

### 5.0 ATTACHMENTS

- 5.1 Attachment 1, "Unit 1, Panel P60A, Ventilation Emergency Mode Startup"
- 5.2 Attachment 2, "TSC Activation Checklist"
- 5.3 Attachment 3, "TSC Closeout Checklist"
- 5.4 Attachment 4, "Unit 1, Panel 60A, Ventilation Return to Normal Operation"

### 6.0 SUPPORTING INFORMATION

- 6.1 PURPOSE
  - 6.1.1 The purpose is to ensure and assist in the timely activation of the TSC and assist the ED, Team Leaders and other TSC personnel in performing emergency functions as required.
- 6.2 CRITERIA FOR USE
  - 6.2.1 Site Emergency Response Organization activation.
  - 6.2.2 Declaration of an alert or TSC activation at the discretion of the ED.

### 6.3 REFERENCES

- 6.3.1 ERP-200, "Emergency Director"
- 6.3.2 ERP-206, "Support Services Group"
- 6.3.3 Nuclear Emergency Plan
- 6.3.4 ERP-130, "Site Evacuation"
- 6.4 COMMITMENT ANNOTATION
  - 6.4.1 CM-1, NRC IFI 93-34-03, TSC Ventilation, (T03285)

ERP-205, Rev. 11 Page 5 of 8

#### ATTACHMENT 1

### UNIT 1, PANEL P60A, VENTILATION EMERGENCY MODE STARTUP

- 1. Verify AHU-1, "TSC Supply Fan" is in the "ON" or "Remote" position.
- 2. Verify RAF-1, "TSC Exhaust Fan" is in the "ON" or "remote" position.
- 3. Place the AFF-1, "HEPA FILTER FAN" switch to the "ON" position.
- 4. Place the AHU-1 "TSC OUTSIDE AIR" damper switch to the "OPEN" position.
- 5. Verify the following indications:

57

- a. MOV-1 closed (green light)
- b. MOV-2 closed (green light)
- c. MOV-3 open (red light)
- d. MOV-4 open (red light)
- NOTE: If any operating equipment does NOT perform as expected, <u>THEN</u> place the equipment in a safe condition <u>AND</u> contact responsible System Engineer <u>OR</u> Shift Management.

ERP-205, Rev. 11 Page 6 of 8

### ATTACHMENT 2

### TSC ACTIVATION CHECKLIST

1.	Ensu	re the following equipment is operable:	SAT/UNSAT
	a.	Radiation Monitoring Equipment	/
	b.	Plant Monitoring System (PMS) Terminals	/
	c.	Emergency Ventilation	/
	d.	Projection System	/
[		NOTE:	
IF E REPA	QUIPN AIR AS	MENT IS MISSING OR INOPERABLE, THEN INITIATE REPLACE 5 APPROPRIATE.	MENT OR
2.	Ensu	re the following TSC activities are functional:	Initial
	a.	Status Boards	
	b.	Message Routing	
	c.	Nuclear Records Management System	

NOTE THE ITEMS ON THIS CHECKLIST ARE NOT REQUIRED TO BE COMPLETED PRIOR TO ACTIVATION OF THE TSC, BUT SHOULD BE ADDRESSED AS SOON AS POSSIBLE.

REMARKS:

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Signature

Date

ERP-205, Rev. 11 Page 7 of 8

Initial

### ATTACHMENT 3

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### TSC CLOSEOUT CHECKLIST

Ensure correct shutdown of this equipment by qualified personnel:	
a. Nuclear Records Management	
b. Radiation Monitoring Equipment	
Return emergency ventilation system to normal from emergency mode per Attachment 4, "Unit 1, Panel P60A, Ventilation Return to Normal Operation".	
Ensure office and consumable supplies, including forms, are inventoried.	
Ensure status boards are cleaned.	
Retrieve all loose documents, maps, worksheets, etc., consolidate and ensure proper storage.	
Perform special or additional tasks as directed by the ED.	
Record equipment and operations deficiencies below or on an attached page.	
REMARKS:	

Signature

Date

#### ATTACHMENT 4

### UNIT 1, PANEL P60A, VENTILATION RETURN TO NORMAL OPERATION

- Verify AHU-1, "TSC Supply Fan" is in the "ON" or "REMOTE" position.
- 2. Verify RAF-1, "TSC Exhaust Fan" is in the "ON" or "REMOTE" position.
- 3. Place AFF-1 "HEPA FILTER FAN" switch to the "OFF" position.
- 4. Place AHU-1 "TSC Outside Air" damper switch to the "CLOSED" position.
- 5. Verify the following indications:

. .

- a. MOV-1 is opened. (red light)
- b. MOV-2 is opened. (red light)
- c. MOV-3 is closed. (green light)
- d. MOV-4 is closed. (green light)
- NOTE: If any operating equipment does <u>NOT</u> perform as expected, <u>THEN</u> place the equipment in a safe condition <u>AND</u> contact responsible System Engineer <u>OR</u> Shift Management.

Effective Date: 6/21/02

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APPENDIX ERP-200-1 Rev 6 Page 1 of 1 RER/rer

EMERGENCY DIRECTOR CHECKLIST (MCR)

Initial Actions	UE	A	SAE	GE
Classify event per ERP-101				
Verify classification if time permits				
Inform Control Room Staff of classification				
If Nort or higher or U.F. declared based on a				
arodible security threat call the SAS Operator at 281				
or 4277 and direct activation of the ERO per ERP-140.				
• Refer SIS Operator to the Emergency Notification				
Binder				
Complete Event Notification Form-Appendix 3				
• Fax the form to the SAS Operator at 3228				
• Phono the SAS Operator at 281 or 4277				
Evaluate necessity to relocate the TSC per Appendix 9				
or the OSC per Appendix 10				
TE a General Emergency is declared and the TSC is not				
activated THEN develop and deliver a PAR within 15	N/A	N/A	N/A	
minutes per Appendix 5				
Appoint NRC Communicator				
Refer the communicator to the Reportability				
Reference Manual for the Event Notification				
Worksheet				
• Direct activation of the Emergency Response Data				
System per ERP-110				
• Direct notification of the NRC using the number				
posted on the ENS phone				
Direct Public Address Announcement per Appendix 4.				
IF dose assessment is required,				
Contact Limerick Main Control Room Shift				
Management(161, 802-2128, or 2120) and request				
Shift Dose Assessment Personnel (SDAP) to perform				
dose projections				
• Fax a completed "Dose Assessment Data Sheet"				
(Appendix 6) to the Limerick SDAP at 802-2124				
Include accident assessment information in MCR logs				
Perform Site Evacuation per ERP-130 (Complete ERP-130	Opt.	Opt.		
Appendix 2 notification)		<u> </u>		. <u> </u>
If plant conditions warrant, implement Severe Accident				
Management Program	0			
Complete Turnover/Briefing Form-Appendix 7				
Turnover ED responsibilities to on call ED.	Upt.			
NOTE: Transfer is at the Shift Manager's discretion				
tor a U.E.			<u> </u>	
when conditions warrant, return to procedure section			1	
14 (), Final Conditions	1	1	1	1

Effective Date: 6/21/02

ERP-140, Rev. 20 Page 1 of 8 CGH/aa

### Exelon Nuclear PEACH BOTTOM UNITS 2 AND 3 EMERGENCY RESPONSE PROCEDURE

### ERP-140 EMERGENCY RESPONSE ORGANIZATION (ERO) CALL OUT

#### 1.0 RESPONSIBILITIES

- 1.1 Emergency Director (ED) Communicators:
  - 1.1.1 Perform call outs designated by the ED.
  - 1.1.2 Initiate call out of ERO for Alert or higher emergency classification.
- 1.2 Team Leader(s):
  - 1.2.1 Respond to ERO activation.
  - 1.2.2 If required, call out Group Leaders.
  - 1.2.3 Report to assigned ERO facility.
- 1.3 Group Leader(s):
  - 1.3.1 Respond to ERO activation.
  - 1.3.2 If required, call out Group Members.
  - 1.3.3 Report to assigned emergency facility.
  - 1.3.4 Report group status to Team Leader.
- 2.0 INITIAL ACTIONS

#### <u>NOTE</u>

ERO ACTIVATION IS REQUIRED AT AN UNUSUAL EVENT IF IT IS BASED ON A CRDIBLE SECURITY THREAT, OR ALERT OR HIGHER EMERGENCY CLASSIFICATION, OR AT THE REQUEST OF THE EMERGENCY DIRECTOR. IF THE NOTIFICATION IS SENT TO THE SAS FOR ERO CALL OUT AND/OR ACTIVATION, THE SAS OPERATOR MAY REFER TO THE EMERGENCY NOTIFICATION BINDER FOR GUIDANCE IN PERFORMING THE ACTIONS OF THE ED COMMUNICATOR.

### 2.1 ED Communicator(s) shall:

- 2.1.1 <u>IF</u> the emergency classification is an Unusual Event <u>THEN</u> follow instructions in ERP-110, "Emergency Notifications".
- 2.1.2 <u>IF</u> directed by ED to call in specific teams, <u>THEN</u> contact appropriate Team Leader(s) utilizing the Weekly On Call List, or the ERO Directory.
  - 2.1.2.1 Contact available Team Leader(s) for each team required.
  - 2.1.2.2 Provide emergency information to contacted Team Leader(s).
  - 2.1.2.3 Request estimated time of arrival (ETA) of Team Leader(s).
  - 2.1.2.4 Record responses on attachment titled "Manual ERO Call Out Log".
  - 2.1.2.5 Fax "Manual ERO Call Out Log" to ED.
- 2.1.3 <u>IF</u> the emergency classification is an Alert or higher, <u>OR</u> ED directs activation of the entire ERO, THEN:
  - 2.1.3.1 Initiate the computer program for activating the ERO.
  - 2.1.3.2 Perform ERP-110, Appendix 1, "Emergency Notification Telephone List".
  - 2.1.3.2 2.1.3.3 <u>IF</u> pagers fail to activate via the computer process (approximately 5 minutes from selecting the appropriate icon), <u>THEN</u> activate by telephone performing
    - ERP-140, Appendix 1, "Automated ERO Activation".
  - 2.1.3.4 <u>IF</u> Automated ERO Activation continues to fail in activating pagers, <u>THEN</u> implement, ERP-140, Attachment 2, "Pager Activation".
  - 2.1.3.5 <u>IF</u> unable to activate pagers, implement ERP-140, Attachment 1, "Manual ERO Call Out Log" using steps 2.1.2.1 through 2.1.2.5.

### 2.2 Team Leader(s) shall:

### NOTE

ADDITIONAL INFORMATION CONCERNING THE EMERGENCY CAN BE OBTAINED BY DIALING INTO THE PEACH BOTTOM ASPEN SYSTEM 1-(717)-456-3605 OR 1-(800)-535-4545 AND SYSTEM SECURITY NUMBER 456. ACCESS THE PEACH BOTTOM REPORT MENU BY USING YOUR ASPEN MAILBOX NUMBER AND PASSWORD. PRESS "6" FOR REPORT SELECTIONS. PRESS "4" FOR EMERGENCY INFORMATION.

2.2.1	<u>IF</u> contacted	by	ED	Communicator
	<u>THEN</u> :			

- 2.2.1.1 Provide communicator with requested information.
- 2.2.1.2 Contact appropriate Group Leader(s) using the Weekly On Call List and the ERO Directory.
  - a. Determine number of group members required.
  - b. Direct Group Leader to contact Group Members and report to their assigned facility upon completion of group member staffing.
- 2.2.2 <u>IF</u> contacted via pager with a 7733 code, <u>THEN</u>:
  - 2.2.2.1 Call into auto dialer as follows.
    - a. Dial 1-(800)-MAGENTA [1-(800)-624-3682].
    - b. Obtain emergency information from recording.
    - c. Provide the auto dialer with necessary information.
      - 1.) social security number
      - 2.) fitness for duty
      - 3.) estimated time of arrival
  - 2.2.2.2 <u>IF</u> unable to access the autodialing system, report to assigned emergency location and implement appropriate procedure(s).

### 2.3 Group Leaders shall:

#### NOTE

ADDITIONAL INFORMATION CONCERNING THE EMERGENCY CAN BE OBTAINED BY DIALING INTO THE PEACH BOTTOM ASPEN SYSTEM 1-(717)-456-3605 OR 1-(800)-535-4545 AND SYSTEM SECURITY NUMBER 456. ACCESS THE PEACH BOTTOM REPORT MENU BY USING YOUR ASPEN MAILBOX NUMBER AND PASSWORD. PRESS "6" FOR REPORT SELECTIONS. PRESS "4" FOR EMERGENCY INFORMATION.

2.3.1	<u>IF</u> notifi <u>THEN</u>	<u>[F</u> notified by Team Leader <u>[HEN</u>				
	2.3.1.1	Call Direc	out Group Members using ERO ctory.			
	2.3.1.2	<u>WHEN</u> <u>THEN</u> repor <u>AND</u> imple	call outs are completed at to assigned emergency facility ement appropriate procedures.			
2.3.2	<u>IF</u> contac <u>THEN</u> :	ted vi	a pager with a 7733 code			
	2.3.2.1	Call	into auto dialer as follows.			
		a.	Dial 1-(800)-MAGENTA [1-(800)-624-3682].			
		b.	Obtain emergency information from recording.			
		c.	Provide the auto dialer with necessary information.			
			<ol> <li>social security number</li> <li>fitness for duty</li> <li>estimated time of arrival</li> </ol>			
	2.3.2.2	<u>IF</u> un syste your	able to access the autodialing m, call out group members using ERO directory.			
2.3.3	Report to <u>AND</u> imple	assig ment a	ned emergency location ppropriate procedure(s).			

2.3.4 Report group status to team leader.

### 3.0 CONTINUING ACTIONS

- 3.1 ED Communicator shall:
  - 3.1.1 Continue call outs as needed until ERO is staffed.
  - 3.1.2 Notify ED of results.
- 3.2 Team Leaders shall:
  - 3.2.1 Determine if additional personnel are required.
  - 3.2.2 Determine if relief shift will be necessary.
  - 3.2.3 Make/delegate call outs as necessary.

### 4.0 FINAL CONDITIONS

4.1 None

#### 5.0 ATTACHMENTS AND APPENDICES

- 5.1 Attachment 1, "Manual ERO Call Out Log"
- 5.2 Attachment 2, "Pager Activation"
- 5.3 ERP-140, Appendix 1, "Automated ERO Activation"

#### 6.0 <u>SUPPORTING INFORMATION</u>

6.1 PURPOSE

To provide guidelines for the activation of emergency response organization personnel.

6.2 CRITERIA FOR USE

Implemented at an Unusual Event based on a credible security threat, the Alert or higher level of classification, or at the discretion of the Emergency Director.

6.3 SPECIAL EQUIPMENT

None

- 6.4 REFERENCES
  - 6.4.1 Nuclear Emergency Plan
  - 6.4.2 Emergency Notification Binder
  - 6.4.3 ERO Directory

ERP-140, Rev. 20 Page 6 of 8

- 6.4.4 ERP-200, "Emergency Director (ED)"
- 6.4.5 Weekly On Call List
- 6.4.6 ERP-110, Appendix 1, "Emergency Notification Telephone List"
- 6.5 COMMITMENT ANNOTATION
  - 6.5.1 None

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ERP-140, Rev. 20 Page 7 of 8

### ATTACHMENT 1

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### MANUAL ERO CALL OUT LOG

	Date		
EMERGENCY POSITION	NAME	ETA	
CONTACT TWO (2	<u>NOTE</u> ) EMERGENCY DIRECTORS.		
Emergency Director			
OSC Director			
Emergency Preparedness C	oordinator		
Maintenance Team Leader	· · · · · · · · · · · · · · · · · · ·		
Maintenance I&C Supervis	or		
Dose Assessment Coordina	tor		
Chemistry Team Leader			
Health Physics Team Lead	er		
Technical Support Team L	eader		
Completed 3	by	Time	
Noted by _	Emergency Director	Time	

ERP-140, Rev. 20 Page 8 of 8

### ATTACHMENT 2

### PAGER ACTIVATION

- 1.0 To activate emergency response pagers for the Peach Bottom responders:
  - 1.1 Access the pager system by dialing 9-1-(215)-244-4240
  - 1.2 After the system answers, enter identification code "8887813".

1.3 After the tone, enter the appropriate numerical code. Actual Emergency , enter <u>7733</u> OR Drill, enter <u>7722</u> OR Pager Test, enter <u>7711</u>

1.4 Press the "#" key and hang up.

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- 2.0 To activate emergency response pagers for the EOF responders:
  - 1.1 Repeat steps 1.1 through 1.4 utilizing 9-1-(410) 995-0542, identification code 4110099, respectively.