

NINE MILE POINT NUCLEAR STATION
EMERGENCY PLAN IMPLEMENTING PROCEDURE

EPIP-EPP-27

REVISION 10

EMERGENCY PUBLIC INFORMATION PROCEDURE

TECHNICAL SPECIFICATION REQUIRED

Approved by:
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General Manager Support Services

3 Sep 02
Date

THIS IS A FULL REVISION

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1.0 PURPOSE

To provide guidance to personnel on the development and dissemination of public information during declared emergencies at the Nine Mile Point Nuclear Station.

2.0 RESPONSIBILITIES

2.1 Nuclear Communications and Public Affairs (NUCAPA) Staff

Prior to JNC activation, maintains responsibility for initial notifications to the news media in the event of a declared emergency.

2.2 Joint News Center (JNC) Director

2.2.1 Maintains overall command and control of Joint News Center operations, including media response and rumor control functions.

2.2.2 Performs actions in accordance with EPIP-EPP-23.

(C1) 2.2.3 Reviews and approves technical information (fatal flaw).

2.3 Director of Emergency Preparedness

Ensures the JNC facilities, procedures and staff are maintained in accordance with the Site Emergency Plan.

2.4 JNC Administrative Manager

Directs all clerical/administrative/security support activities and functions at the Joint News Center (JNC) to include:

2.4.1 Opening/activating the JNC building when notified

2.4.2 Verifying and reporting JNC operational readiness to the JNC Director

2.4.3 Supervising all support activities and functions at the JNC

2.5 JNC Technical Briefer

Supports the JNC Director by providing detailed technical information at pre-briefings to include:

2.5.1 Providing technically accurate information on the incident and plant operations for use by JNC personnel during media briefings.

2.5.2 Participating in preparations for news briefings

2.5.3 Review of news release information for technical accuracy.

2.6 JNC Radiological Briefer

Supports the JNC Director by providing detailed information at pre-briefings to include:

2.6.1 Providing technically accurate information associated with the radiological aspects on the incident and plant operations for use by JNC personnel during media briefings.

2.6.2 Participating in preparations for news briefings

2.6.3 Review of news release information for accuracy associated with the radiological aspects of the incident.

2.7 JNC Writer

Prepares written material including news releases, briefing summaries and other materials as directed by the JNC Director.

2.8 JNC Rumor Control Coordinator

2.8.1 Coordinates the efforts of rumor control, media response and media monitoring to ensure rumors are addressed and questions from both the media and general public are accurately answered.

2.8.2 Obtains approved information available to aid in response to rumor inquiries.

2.9 JNC Spokesperson

Supports the JNC Director by providing timely, technically accurate and complete briefings to the media when required or directed that are consistent with:

- Nine Mile Point Nuclear Station LLC goals for Nuclear Safety, Personnel Safety and Plant Safety.
- Information provided by the Oswego County, New York State and as applicable the NRC representatives.

3.0 PROCEDURE

3.1 Initial Actions (prior to JNC activation)

3.1.1 The Director NUCAPA, or designee will be notified of a declared emergency by normal ERO notification methods (pager, telephone call).

3.1.2 The Director NUCAPA, or designee should perform the following:

- a. Develop a press release appropriate to the event. See Attachment 2 Figures 1 through 4 for sample of a press release.
- b. Obtain approval (verbal OR written) of the press release contents from the SSS/ED.
- c. Periodically obtain updated information from the SSS/ED and make press releases in accordance with Steps 3.1.2.a-d.
- d. If the event is terminated, then perform appropriate notifications in accordance with Steps 3.1.2.a-d.
- e. If appropriate, provide information to local and state officials.

3.2 JNC Activation

3.2.1 The JNC shall be activated upon declaration of an Alert emergency classification or higher, or any event expected to attract significant media attention.

3.2.2 If the JNC is being activated for causes other than a declared emergency, the JNC Director should ensure each unit SSS is notified.

3.2.3 The JNC Director should travel to and ensure that the JNC commences activation in accordance with Attachment 1.

3.2.4 The JNC Director should verify the JNC is staffed with the following positions:

- *JNC Director
- *JNC Spokesperson
- *Rumor Control Coordinator
- Rumor Control/Media Response Staff (2)
- Media Monitoring Staff (2)
- Clerical staff (2)(assigned by EOF Admin Logistics Manager)
- Rad Briefer
- Technical Briefer
- JNC Administrative Manager
- JNC Writer
- Security

(* positions are required in order to declare the JNC operational)

3.3 JNC Operation

- 3.3.1 JNC Writer should ensure press releases are developed in accordance with Attachment 2, "Press Release Checklist". See Attachment 2, Figures 1 through 4 for sample press release.
- 3.3.2 The JNC Technical Briefer should perform actions in accordance with Attachment 4, JNC Technical Briefer Checklist.
- 3.3.3 The JNC Radiological Briefer should perform actions in accordance with Attachment 5, JNC Radiological Briefer Checklist.
- 3.3.4 The JNC Director shall:
- a. Coordinate pre-brief sessions. ≈ 5 min. prior to pre-brief session, using the PA system announce, "Coordinators in 5". Coordinate pre-brief sessions to ensure:
 - Timeliness
 - Accuracy and appropriateness of information
 - Responsiveness to unresolved inquiries
 - Equity of time for State, County and Utility presentations (as appropriate)
 - b. Initiate all press/media briefings by introducing all participants and turning the floor over to the appropriate (e.g. utility, county or state) spokesperson.
 - c. Coordinate and facilitates press briefings to ensure:
 - Timeliness
 - Accuracy and appropriateness of information
 - Responsiveness to unresolved inquiries
 - Equity of time for State, County and Utility presentations (as appropriate)
- 3.3.5 Rumor Control Staff shall complete actions in Attachment 8.
- 3.3.6 Media Response Staff shall complete actions in Attachment 7.
- 3.3.7 JNC Administrative Manager shall complete actions in Attachment 3.
- 3.3.8 JNC Media Monitoring shall complete actions in Attachment 9.
- 3.3.9 JNC Spokesperson shall complete actions in Attachment 15.

3.3.10 If a Corporate Officer is available and wishes to address the media, the JNC Director shall:

- a. Ensure the address is coordinated with the State and County personnel.
- b. Ensure JNC process for media briefings is followed.
- c. Authorize the Corporate Officer to address the media.
- d. Monitor the address to ensure that any unanswered questions are addressed in future briefings.

3.3.11 Rumor Control Coordinator shall complete actions in Attachment 6.

4.0 **DEFINITIONS**

4.1 **Choices for Release Status:**

- **Release of radioactive materials due to the event above federal limits.**
Any monitored or unmonitored release pathway experiencing an increase following the event that results in exceeding the limits defined in the U1 Technical Specifications or U2 Offsite Dose Calculation Manual.
- **Release of radioactive materials due to the event below federal limits.**
Any monitored or unmonitored release pathway experiencing an increase following the event but does NOT result in exceeding the limits defined in the U1 Technical Specifications or U2 Offsite Dose Calculation Manual.
- **No release of radioactive materials as a result of the event, however the plant continues to release a small amount of radioactive material as part of its normal operational process as allowed by law (operating license).**
- **There is no release of radioactive materials from the plant above detectable levels.**
Indicated by the fact that all process streams are either showing no release of radioactive materials (0 uci/sec), or all have been isolated and all downwind surveys indicate background radiation levels.

4.2 **Coordinators in 5** = Implies a pre-briefing session will be conducted in the pre-brief room in 5 minutes. Term will be used to minimize alerting the media of a pre-brief session.

5.0 REFERENCES AND COMMITMENTS

5.1 Technical Specifications

None

5.2 Licensee Documentation

Nine Mile Point Site Emergency Plan

5.3 Standards, Regulations, and Codes

NUREG-0654, Rev 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants

5.4 Policies, Programs, and Procedures

None

5.5 Commitments

<u>Sequence Number</u>	<u>Commitment Number</u>	<u>Description</u>
1	DER-NM-2001-4717	JNC Director review of technical information to verify accuracy (fatal flaw)

6.0 RECORD REVIEW AND DISPOSITION

- 6.1 The following records generated by this procedure shall be maintained by Records Management for the Permanent Plant File in accordance with NIP-RMG-01, Records Management:

NOTE: This section only applies if records are generated during an actual emergency.

Attachment 1, JNC Activation Checklist
Attachment 2, Press Release Checklist
Attachment 3, JNC Administrative Manager Checklist
Attachment 3, Figure 1, JNC Registration Checklist
Attachment 4, JNC Technical Briefer Checklist
Attachment 5, JNC Radiological Briefer Checklist
Attachment 6, JNC Rumor Control Coordinator Checklist
Attachment 7, Media Response Checklist
Attachment 8, Rumor Control Checklist
Attachment 9, Media Monitoring Checklist
Attachment 10, Rumor Control Media Response Inquiry and Off Air Monitor Form
Attachment 11, JNC Audio Visual Checklist
Attachment 12, JNC Staff Sign-In
Attachment 13, JNC Shutdown Checklist
Attachment 15, JNC Spokesperson Checklist

- 6.2 The following records generated by this procedure are not required for retention in the Permanent Plant File:

NOTE: This section only applies if records are generated for any reason other than an actual emergency.

Attachment 1, JNC Activation Checklist
Attachment 2, Press Release Checklist
Attachment 3, JNC Administrative Manager Checklist
Attachment 3, Figure 1, JNC Registration Checklist
Attachment 4, JNC Technical Briefer Checklist
Attachment 5, JNC Radiological Briefer Checklist
Attachment 6, JNC Rumor Control Coordinator Checklist
Attachment 6, Figure 1, Rumor Control Log
Attachment 7, Media Response Checklist
Attachment 8, Rumor Control Checklist
Attachment 9, Media Monitoring Checklist
Attachment 10, Rumor Control Media Response Inquiry and Off Air Monitor Form
Attachment 11, JNC Audio Visual Checklist
Attachment 12, JNC Staff Sign-In
Attachment 13, JNC Shutdown Checklist
Attachment 15, JNC Spokesperson Checklist

ATTACHMENT 1: JNC ACTIVATION CHECKLIST

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NAME:	DATE:
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- NOTE:**
1. The first qualified JNC Director, JNC Administrative Manager or their designee to arrive at the JNC should initiate the actions required by this checklist.
 2. If there is a power failure at the JNC, report it to the Central Regional Control Center (CRCC) in accordance with step 10 of this checklist.
 3. Steps may be performed in any order (as appropriate)
 4. ** Indicates step must be completed prior to declaring the facility operational.

Complete NA

1. Verify the following staff know they must sign in on the JNC Staffing sign-in sheet and they are to obtain the appropriate badge:

NOTE: Clerical staff may be used to obtain sign-ins to minimize delay in facility activation.

(* indicates position required for JNC to be declared operational)

- | | | | |
|----|--|--------------------------|--------------------------|
| a. | *JNC Director | <input type="checkbox"/> | <input type="checkbox"/> |
| b. | *JNC Spokesperson | <input type="checkbox"/> | <input type="checkbox"/> |
| c. | *Rumor Control Coordinator | <input type="checkbox"/> | <input type="checkbox"/> |
| d. | Rumor Control/Media Response Staff (2) | <input type="checkbox"/> | <input type="checkbox"/> |
| e. | Media Monitoring Staff (2) | <input type="checkbox"/> | <input type="checkbox"/> |
| f. | Clerical Staff (2) | <input type="checkbox"/> | <input type="checkbox"/> |
| g. | Rad Briefer | <input type="checkbox"/> | <input type="checkbox"/> |
| h. | Technical Briefer | <input type="checkbox"/> | <input type="checkbox"/> |
| i. | JNC Administrative Manager | <input type="checkbox"/> | <input type="checkbox"/> |
| j. | JNC Writer | <input type="checkbox"/> | <input type="checkbox"/> |
| k. | Security | <input type="checkbox"/> | <input type="checkbox"/> |

NOTE: UNLOCK THE JNC DOORS ONLY AFTER JNC SECURITY IS ASSURED.

- ** 2. Verify main door is unlocked and other doors are locked and remain locked ☐ ☐
- a. Ensure that security in pre-briefing areas is assured to ensure privacy of pre-briefing sessions ☐ ☐
3. When the JNC Technical Briefer arrives direct them to synchronize clocks throughout the JNC with the control room via the Tech Info line ☐ ☐

NOTE: Failure of specific equipment to power up does NOT preclude activation of the JNC.

- ** 4. In all rooms, power up or verify all NMP computers, printers and other equipment is powered up as required (Do not turn on equipment marked JAF) ☐ ☐

NAME:	DATE:
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Complete NA

5. In the Main Briefing room:

- a. Turn on rear projection screen video projector by pushing the PJ button and then the "power on" push-button on the remote control for the video projector (verify by ensuring a picture is displayed on the rear projection screen, this may take several seconds for the projector to warm up and light)..... ☐ ☐
- If the projection screen does not power up, verify that the projector has Power to it, and that the power is on.
- b. Select the computer display by pressing the "S" (source) button on the video projector remote control until the computer display is presented ☐ ☐
- c. Turn on the computer located on the stage and log in using your own ID and password ☐ ☐
- e. Using the computer mouse, double click on:
- My Computer
 - common on nmcom2'(S:)
 - Emergency Prep
 - JNC Presentations
 - JNC Power Point Presentations
 - The appropriate icon for the unit (Unit 1 or Unit 2) having the emergency
 - Verify the program cycles through the power point presentation ☐ ☐
6. Perform or direct the performance of Steps 1 through 7 "Start-Up" in Attachment 11, JNC Audio Visual Checklist ☐ ☐

NAME:	DATE:
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Complete NA

**** 7. In media monitoring room:**

- | | | |
|--|--------------------------|--------------------------|
| a. Turn on all TVs and VCRs | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Verify the VCRs are monitoring and recording TV stations as labeled | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Start up the computer used to monitor the internet | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Verify that the dish network boxes are powered up | <input type="checkbox"/> | <input type="checkbox"/> |

8. In the electrical/mechanical rooms verify water supplies are available
and full. If not call for service per instructions on tanks ☐ ☐

9. IF the JNC experiences a loss of power,
THEN call the CRCC Shift Supervisor at 460-2421 ☐ ☐

a. Identify who you are, why you are calling, and provide the following information:

1. State the facility status, i.e. unoccupied, drill, exercise actual event, etc.
2. State the location of the facility as:

"This is the 9 Mile Point Emergency Media Center located on Route 176 (Whitaker Road) Fulton. We are supplied by the Whitaker Rd. feeder number 29652. Our service pole is 55-1 and we are located adjacent to the Airport and the Nuclear Emergency Center."

ATTACHMENT 2: PRESS RELEASE CHECKLIST

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NAME:	DATE:
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- NOTES:**
1. Complete a new checklist for each press release.
 2. Templates for press releases, (Figures 1 through 4) can be found at the following computer address: S:/Emergency Prep/JNC Presentations/Press Release templates and/or on desktop icon.
 3. Make a copy of the template for your own use.

Complete NA

1. Ensure that all press releases contain the following information (if appropriate) See figures 1 through 4 for format:

a. Basic information about the plant.....	□	□
b. Concisely describes the event and states whether the event is:		
i. Nuclear related	□	□
ii. Safety related	□	□
iii. Of radiological significance	□	□
c. When the incident took place and, if possible, how long the situation is expected to last	□	□
d. Status of any radioactive release (see Section 4.0)	□	□
e. Identifies information contacts at NMPNS and, if necessary, emergency response agencies	□	□
f. The Public Rumor Control telephone numbers, if appropriate	□	□
g. The location of the Joint News Center	□	□
h. The current status of the plant.....	□	□

2. Prior to transmitting the press release, ensure the press release is:

a. Spell and grammar checked	□	□
b. Reviewed by the JNC Director	□	□
c. Reviewed with the Technical Briefer (if appropriate)	□	□
d. Reviewed with the Radiological Briefer (if appropriate)	□	□
e. Stamped with the approve stamp.....	□	□
f. Reviewed and approved by the SSS/ED (prior to EOF activation), or the ED/RM (after EOF activation)	□	□
g. Date/Time and initialed by the ED	□	□
h. Second stamp approved sign-off by NYS, OCEMO, NRC (if available)	□	□
i. Placed in basket for copy and distribution	□	□

Complete NA

- 3. Correct any inaccurate information in a subsequent
press release and in a press conference ☐ ☐
- 4. Forward to all affected agencies (State, County, and JAF and Constellation) in a
timely manner ☐ ☐

Figure 1: Unusual Event (Sample Press Release)

Joint News Center
Phone: 315-592-3740
Fax: 315-592-3850

News Release

For release _____ EDT, Date: _____

"UNUSUAL EVENT" DECLARED AT NINE MILE POINT UNIT _____

SCRIBA An "Unusual Event" was declared at _____ am/pm today by officials at Nine Mile Point Unit _____ when a _____
_____. The plant is being shutdown officials said.

The "Unusual Event" is the least serious of four emergency classifications as defined by the federal Nuclear Regulatory Commission. In order of increasing seriousness, the four classifications are: Unusual Event (least serious), Alert, Site Area Emergency, General Emergency (most serious).

There is no release of radiation into the atmosphere, and there are no injuries.

All appropriate local, state and federal agencies have been notified of the plant's status.

Nine Mile Point Unit _____ is an _____ megawatt boiling water reactor. Constellation Energy Group owns 100% of Unit 1 and 82% of Unit 2. The remaining 18% of Unit 2 is owned by the Long Island Power Authority.

Figure 2: Alert (Sample Press Release)

Joint News Center
Phone: 315-592-3740
Fax: 315-592-3850

News Release

For release _____ EDT, Date: _____

"ALERT" DECLARED AT NINE MILE POINT UNIT _____

SCRIBA An "Alert" was declared at _____ am/pm today by officials at Nine Mile Point Unit _____ when a _____. The plant is being shutdown officials said.

The "Alert" is second of the four emergency classifications as defined by the federal Nuclear Regulatory Commission. In order of increasing seriousness, the classifications are: Unusual Event, (least serious), Alert, Site Area Emergency, General Emergency (most serious).

There is no release of radiation into the atmosphere, and there are no injuries.

All appropriate local, state and federal agencies have been notified of the plant's status.

Nine Mile Point Unit _____ is an _____ megawatt boiling water reactor. Constellation Energy Group owns 100% of Unit 1 and 82% of Unit 2. The remaining 18% of Unit 2 is owned by the Long Island Power Authority.

Figure 3: Site Area Emergency (Sample Press Release)

Joint News Center
Phone: 315-592-3740
Fax: 315-592-3850

News Release

For release _____ EDT, Date: _____

"SITE AREA EMERGENCY" DECLARED AT NINE MILE POINT UNIT _____

SCRIBA A "Site Area Emergency" was declared at _____ am/pm today by officials at Nine Mile Point Unit _____ when a _____. The plant is being shutdown officials said.

The "Site Area Emergency" is the third of the four emergency classifications as defined by the federal Nuclear Regulatory Commission. In order of increasing seriousness, the classifications are: Unusual Event, (least serious), Alert, Site Area Emergency, General Emergency (most serious).

There is no release of radiation into the atmosphere, and there are no injuries.

All appropriate local, state and federal agencies have been notified of the plant's status.

Nine Mile Point Unit _____ is an _____ megawatt boiling water reactor. Constellation Energy Group owns 100% of Unit 1 and 82% of Unit 2. The remaining 18% of Unit 2 is owned by the Long Island Power Authority.

Figure 4: General Emergency (Sample Press Release)

Joint News Center
Phone: 315-592-3740
Fax: 315-592-3850

News Release

For release _____ EDT, Date: _____

"GENERAL EMERGENCY" DECLARED AT NINE MILE POINT UNIT _____

SCRIBA A "General Emergency" was declared at _____ am/pm today by officials at Nine Mile Point Unit _____ when a _____. The plant is being shutdown officials said.

The "General Emergency" is the most serious of four emergency classifications defined by the federal Nuclear Regulatory Commission. In order of increasing seriousness, the classifications are: Unusual Event (least serious), Alert, Site Area Emergency, General Emergency (most serious).

There is no release of radiation into the atmosphere, and there are no injuries.

All appropriate local, state and federal agencies have been notified of the plant's status.

Nine Mile Point Unit _____ is an _____ megawatt boiling water reactor. Constellation Energy Group owns 100% of Unit 1 and 82% of Unit 2. The remaining 18% of Unit 2 is owned by the Long Island Power Authority.

ATTACHMENT 3: JNC ADMINISTRATIVE MANAGER CHECKLIST

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NAME:	DATE:
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Complete NA

1. Upon notification of JNC activation, proceed to JNC. ☐ ☐
 2. Pickup cordless telephone (ext. 3715) in the NMP/JAFNPP room and keep it with you at all times to allow for personnel to contact you as needed while in the JNC..... ☐ ☐
 3. Activate the JNC in accordance with Attachment 1, JNC Activation Checklist..... ☐ ☐
 4. Assign first available JNC clerical staff to registration and direct them to perform actions in accordance with Attachment 3 Figure 1, JNC Registration Checklist..... ☐ ☐
 5. Verify the staffing chart (located on north wall of conference area) is filled out as staff members arrive and assume their positions in the JNC ☐ ☐
 6. Using the JNC staffing sign in log (Attachment 12) as verification, inform and update the JNC Director (ext. 3712) as staffing of the JNC continues..... ☐ ☐
 7. When time permits, ensure that all ERO members qualification status is current using the following actions: ☐ ☐
 - a. Utilize the instructions on the first page of the ERO qualification list (located in the Nine Mile Point/JAF Room)
 - b. If an ERO members qualification status is lapsed OR cannot be determined:
 1. Immediately replace the ERO member with a qualified individual OR
 2. Provide direct oversight of the unqualified individual until such time that a qualified replacement can be obtained.
- NOTE:** Personnel who are not ERO qualified may perform required actions **ONLY** with direct oversight from an ERO member qualified in the action(s) being performed.
8. Supervise and manage the following activities/functions:
 - a. Registration (Attachment 3, Fig 1) CONTINUOUS
 - b. Clerical services including fax, telephone, copy and poster enlargement functions CONTINUOUS
 - c. Security needs..... CONTINUOUS
 - d. Communication of status information to clerical and security personnel CONTINUOUS

ATTACHMENT 3 (Cont)

Page 2 of 2

NAME:	DATE:
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Complete NA

8. (Cont)

e. Ensure classification signs and associated postings are updated when appropriate CONTINUOUS

f. Maintenance of JNC including:

- Equipment setup: CONTINUOUS
- Distribution and posting of news releases and briefing summaries in all areas of the JNC. CONTINUOUS
- Post sufficient copies of all press releases and briefing summaries in the bins located in the main briefing area for number of personnel present. CONTINUOUS

g. Coordinate needed auxiliary services (as necessary) with the Admin. Logistics Manager (593-5876) in the EOF to include: ☐ ☐

- Catering
- Messenger services
- Additional stenographic/typing
- Transportation
- Lodging
- Laundry services
- Additional equipment

9. In conjunction with JNC Director develop 1st and 2nd shift staff assignment schedules, using duty rosters and qualification lists and fax these to the TLAM in the EOF (Phone # 593-5951) ☐ ☐

10. Upon termination of the event and termination of required activities at the JNC, perform the following:
- a. Collect registration logs and ensure all badges are returned and accounted for ☐ ☐
 - b. Turn over any documentary logs and related materials to JNC Director ☐ ☐
 - c. Perform JNC shutdown checklist (Attachment 13) ☐ ☐
 - d. Report completion of termination activities to JNC Director ☐ ☐

ATTACHMENT 3 (Cont)

Figure 1: JNC Registration Checklist

Page 1 of 2

NAME:	DATE:
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Complete NA

1. Start-up

- a. Set out individual registration sheets and badges with holders for:
- observers and visitors - blue ☐ ☐
 - media representatives - pink ☐ ☐
 - JNC staff (including state/county/federal officials) - yellow ☐ ☐
- b. Ensure NMPNS media kit and JNC information sheet are available for use by media ☐ ☐
- c. Report readiness to JNC Administrative Manager (Ext. 3715) ☐ ☐

2. Operation

Personnel granted access to the JNC is limited to only those individuals performing duties in an official capacity (e.g. media personnel with appropriate credentials). Members of the general public or visitors who are unable to provide reasonable proof of authorization should not be granted access. (If uncertainty exists contact the JNC Administrative Manager for resolution).

NOTE: Prior to permitting any visitors or media personnel to enter the JNC, verify JNC security is assured.

- a. Request identification from every individual entering the JNC CONTINUOUS
- b. Determine and provide badge color for each individual entering the JNC CONTINUOUS
- c. Ensure Utility, County, State and Federal employees have picture identification either issued by a county or state disaster preparedness office, or from a federal agency (yellow badge) CONTINUOUS
- d. If a question arises regarding authorization of an individual, contact the JNC Director (ext. 3712) CONTINUOUS

ATTACHMENT 3 (Cont)

Figure 1 (Cont)

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NAME:	DATE:
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Complete NA

2. (Cont)

- e. Issue each person a color-coded badge and holder filled in with his or her name, and affiliation:
- Blue - observers and visitors CONTINUOUS
 - Pink - media: a separate log (pink) should be kept for print, radio and television media CONTINUOUS
 - Yellow - all JNC staff CONTINUOUS
- f. Record badge number on appropriate color-coded log sheet CONTINUOUS
- g. Offer each media representative and visitor a press kit. Point out the media press telephones room and briefing area CONTINUOUS
- h. Ensure people leaving the JNC return their badges and check the returned column on the respective log CONTINUOUS

3. Close down

- a. Return unused registration materials to the proper place on the shelves or file cabinets behind registration desk ☐ ☐
- b. Separate returned badges and then return holders to inventory ☐ ☐
- c. File pre-made badges, and destroy and dispose of used badges ☐ ☐
- d. Perform an inventory of registration supplies and report needs to the JNC Administrative Manager ☐ ☐
- e. Turn over registration logs to the JNC Administrative Manager and report registration closure complete ☐ ☐

ATTACHMENT 4: JNC TECHNICAL BRIEFER CHECKLIST

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NAME:	DATE:
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Complete NA

1. Obtain information on plant status and events via the Tech Information Line Headset CONTINUOUS
2. Obtain and provide plant status updates with JNC Director and JNC staff (when necessary) ensuring all are kept up to date (use tech info line or travel to EOF as necessary) CONTINUOUS
3. Maintain a log of events CONTINUOUS
4. Complete Emergency Status Report (see Attachment 4, Figure 1 for sample) initially and update the Emergency Status Report about every 30 minutes or as necessary CONTINUOUS
5. Assist in the identification and organization of topics for the next media briefing.... CONTINUOUS
6. Review all press releases for technical accuracy CONTINUOUS
7. Attend all pre-briefing conferences to share information and coordinate with state and county representatives at the JNC CONTINUOUS
 - a. Present information at pre-briefing sessions on the plant status and events, response of the station staff, and background on plant systems and design, as requested CONTINUOUS
 - b. Participate in a pre-briefing session question and answer session, coordinated by the JNC Director CONTINUOUS
8. Update the JNC Director and JNC staff on events and changes in plant status that occurred during each briefing CONTINUOUS
9. Obtain responses to reporters' questions that remained unanswered during briefing CONTINUOUS
10. Begin gathering and organizing information for the next news briefing CONTINUOUS
11. Upon termination of the event, ensure the JNC Director is notified ☐ ☐
12. Upon termination of JNC activities, ensure all logs, status boards and all paperwork is forwarded to the JNC Director for inclusion in the permanent plant file ☐ ☐

ATTACHMENT 4 (Cont)

Page 2 of 2

Figure 1: Emergency Status Report (Sample)

Nine Mile Point Unit No. ____
Nuclear Power Station
Emergency Status Report

No. _____
Date: _____
Time: _____
Posted by: _____

1. This ____ is / ____ is not a drill	6. Off-site radiological monitoring teams: <input type="checkbox"/> have not been sent out. <input type="checkbox"/> will be sent out. <input type="checkbox"/> have been sent out.
2. Classification <input type="checkbox"/> Unusual Event <input type="checkbox"/> Alert <input type="checkbox"/> Site area emergency <input type="checkbox"/> General emergency <input type="checkbox"/> Recovery phase	7. Primary containment integrity is: <input type="checkbox"/> secure <input type="checkbox"/> not secure
3. Changes since last status report: _____ _____ _____	8. Secondary containment integrity is: <input type="checkbox"/> secure <input type="checkbox"/> not secure
4. The plant status is: <input type="checkbox"/> stable <input type="checkbox"/> improving <input type="checkbox"/> degrading	Wind is blowing from _____ degrees at _____ miles per hour
5. Radiation levels at the plant site boundary are: <input type="checkbox"/> normal <input type="checkbox"/> above normal comments: _____ _____	

ATTACHMENT 5: JNC RADIOLOGICAL BRIEFER CHECKLIST

Page 1 of 1

NAME:

DATE:

Complete NA

1. Obtain information on radiological status and release status from the EOF Dose Assessment Staff as necessary (travel to EOF as necessary)..... CONTINUOUS
2. Review radiological information with JNC Director and JNC staff ensuring all are kept up to date CONTINUOUS
3. Maintain a log of events CONTINUOUS
4. Assist in the identification and organization of topics for the next media briefing..... CONTINUOUS
5. Review all press releases for accuracy CONTINUOUS
6. Attend all pre-briefing conferences to share information and coordinate with state and county representatives at the JNC CONTINUOUS
7. Participate in pre-briefing question and answer sessions, coordinated by the JNC Director to include:
 - information on the radiological status,
 - events at the plant
 - response of the station HP staff, CONTINUOUS
8. Begin gathering and organizing information for the next news briefing CONTINUOUS
9. Upon termination of JNC activities, ensure all logs, status boards and all paperwork is forwarded to the JNC Director for inclusion in the permanent plant file ☐ ☐

ATTACHMENT 6: JNC RUMOR CONTROL COORDINATOR CHECKLIST

Page 1 of 2

NAME:	DATE:
-------	-------

Complete NA

- Pick up cordless telephone (ext. 3767) and keep it with you while in the JNC ☐ ☐
- Verify all monitors (video and audio) are set to the appropriate electronic media outlet as below: (VCRs provide the channel number for the monitors)
TV Stations

Channel 3	<input type="checkbox"/>	<input type="checkbox"/>
Channel 5	<input type="checkbox"/>	<input type="checkbox"/>
Channel 9	<input type="checkbox"/>	<input type="checkbox"/>
Primestar on CNN	<input type="checkbox"/>	<input type="checkbox"/>

Radio Stations

WSGO (1410 AM)	<input type="checkbox"/>	<input type="checkbox"/>
WZZZ (1300 AM)	<input type="checkbox"/>	<input type="checkbox"/>
WSCP (1070 AM)	<input type="checkbox"/>	<input type="checkbox"/>
WSYR (570 AM)	<input type="checkbox"/>	<input type="checkbox"/>
WNDR (1260 AM)	<input type="checkbox"/>	<input type="checkbox"/>
WKFM (104.7 FM)	<input type="checkbox"/>	<input type="checkbox"/>
WSGO (105.5 FM)	<input type="checkbox"/>	<input type="checkbox"/>
- Ensure that video tapes are inserted in VCRs and press record as necessary to monitor and record broadcasts involving information concerning the event at Nine Mile Point ☐ ☐
- Ensure audio tapes are inserted in tape players and press record as necessary to monitor and record broadcasts involving information concerning the event at Nine Mile Point ☐ ☐
- Maintain a log of all actions taken associated with rumor control..... CONTINUOUS
- Ensure that rumor control staff record all reports by the Media on the Rumor Control Form, Attachment 10 CONTINUOUS

ATTACHMENT 6 (Cont)

Page 2 of 2

NAME:	DATE:
-------	-------

Complete NA

7. Ensure that the Media Monitoring Staff use the PC in the media monitoring room to monitor the Internet and log all reports concerning the event on the Attachment 10 CONTINUOUS
8. Provide immediate feedback to the JNC Director (ext. 3712) of any inaccurate or incorrect reports. CONTINUOUS
9. Secure video/audio tapes/print internet page with inaccurate coverage for further review CONTINUOUS
10. Ensure the media response team is adequately staffed by the Media Response Team composed of personnel from NMPNS, State and County ☐ ☐
11. Ensure each member of the media response team is supplied with the information and materials to handle inquiries ☐ ☐
12. Ensure the Rumor Control function is adequately staffed by personnel from NMPNS, State and County ☐ ☐
13. Ensure corrections to inaccurate reports are part of the briefings by the appropriate spokesperson, or by contacts directly with the responsible station or publication..... CONTINUOUS
14. Ensure that the "Public Rumor Control" telephone number is periodically announced at news briefings..... CONTINUOUS
15. Ensure that the "Public Rumor Control" number is distributed to the state, county, and utility telephone operators for public inquiry referral ☐ ☐

ATTACHMENT 7: MEDIA RESPONSE CHECKLIST

Page 1 of 1

NAME:	DATE:
-------	-------

Complete NA

1. Each member of the Media Response team should:
 - a. Log all contacts using Attachment 10, including time of inquiry, identity, affiliation and telephone number of the caller and nature of the inquiry and response CONTINUOUS
 - b. Provide authorized statements and answer questions based on approved information available at the time CONTINUOUS
 - c. Provide authorized facts about Nine Mile Point which are in their data and fact sheets, news releases and annual reports, if they are requested CONTINUOUS
 - d. Provide times and locations of press conferences and briefings, as well as names and telephone numbers of appropriate contacts in other agencies CONTINUOUS
2. Refer inquiries requiring further elaboration or special response to the appropriate source CONTINUOUS
3. If the appropriate sources are unavailable, a return call should be offered, "as soon as feasible". Do not make guarantees to meet deadlines, but every effort should be made to do so. CONTINUOUS
4. Upon termination of JNC activities, ensure all logs, status boards and all paperwork is forwarded to the JNC Director for inclusion in the permanent plant file ☐ ☐
 - a. Provide one copy of all response logs to the NY State PIO ☐ ☐

ATTACHMENT 8: JNC RUMOR CONTROL CHECKLIST

Page 1 of 1

NAME:	DATE:
-------	-------

Complete NA

NOTE: Ensure that information provided comes from written informational materials, Emergency Alert System (EAS) messages, and press releases. Any message agreed upon by the state, county, or utility may be used, thus providing for the ability to address specific incorrect or inaccurate information.

1. Ensure the monitoring of the broadcast and print media for news report accuracy CONTINUOUS
2. Ensure appropriate response to misinformation or rumors circulating through the public using Attachment 10 as appropriate CONTINUOUS
3. Work under the guidance and direction of the Rumor Control Coordinator. CONTINUOUS
4. Answer the phone, saying "Joint News Center (if appropriate add, **THIS IS A DRILL**), may I help you" CONTINUOUS
5. Respond to inquiries using only the materials and information provided by the Rumor Control Coordinator. CONTINUOUS
6. Provide only factual information relative to the caller's questions or concerns. CONTINUOUS
7. If you are unsure how best to answer the caller's question, ask the Rumor Control Coordinator (Ext. 3767) CONTINUOUS
8. Document all appropriate information on Attachment 10 CONTINUOUS
9. Turn in log sheets as they are completed to the Rumor Control Coordinator. CONTINUOUS

ATTACHMENT 9: JNC MEDIA MONITORING CHECKLIST

Page 1 of 1

NAME:	DATE:
-------	-------

Complete NA

1. Ensure audio/video equipment at the Joint News Center is used to monitor and record news broadcasts and bulletins carried by radio, television stations and the internet CONTINUOUS
2. Log all reports concerning the event at Nine Mile Point on Attachment 10 CONTINUOUS
from the following, radio, T.V., internet, scanner etc.
3. Ensure all broadcasts, as well as news reports in the print media, are reviewed for accuracy. CONTINUOUS
4. Review and monitor off-air monitoring and recording capability to ensure every opportunity for prompt identification of inaccurate or incorrect information is utilized CONTINUOUS

NOTE: When using the internet periodically press the "F5" key to refresh the Information posted.

5. Use the PC in the media monitoring room to monitor the Internet and log all reports concerning the event on Attachment 10 CONTINUOUS
Typical web sites include:

- www.cnn.com
- www.abcnews.com
- www.nbc.com/nbc/NBC_NEWS/
- www.cbsnews.com
- www.msnbc.com
- www.bbcnews.com
- www.foxnews.com

6. Ensure any reports with inaccurate or erroneous information are brought to the attention of the Rumor Control Coordinator CONTINUOUS
7. Upon termination of JNC activities, ensure all logs, status boards and all paperwork is forwarded to the JNC Director for inclusion in the permanent plant file ☐ ☐

ATTACHMENT 10

Public Inquiry – Media Response Inquiry and Off Air Monitor Form

Type of call:

☐ Public Inquiry ☐ Professional Inquiry ☐ Media Inquiry ☐ Media Monitor Report

Date of Call/Broadcast: _____ Time of Call/Broadcast: _____

Name of responder/monitor: _____

Media Name/Location: _____

Caller's/Reporter's Name: _____ Phone: _____

Question(s) Asked/Inaccurate Information: _____

Response Given/Correct Information and Source: _____

Was the call referred: () Yes () No If yes, to whom? _____

Further action required: () Yes () No

Was this action completed? () Yes () No By: _____

Reported to the Rumor Control Coordinator at: _____

Rumor Control Coordinator notes: _____

Return completed form to the Rumor Control Coordinator.

ATTACHMENT 11: JNC AUDIO VISUAL (CONTROL BOOTH) CHECKLIST

Page 1 of 2

NAME:	DATE:
-------	-------

Complete NA

- NOTE:**
1. Should any AV equipment fail, or any AV assistance is needed notify the EP Department at 349-4444 and leave a message, then call for assistance from Univisions at 437-0301.
 2. An equipment setup manual for the entire audio visual system may be found in the Equipment Manuals drawer in the file cabinet located in the Fax/Copy room.

START-UP

1. Obtain key (labeled JNC Master) for control booth from key cabinet located in the NMP/JAFNPP room and open door to booth ☐ ☐
2. Turn on the audio system (green button, labeled main power switch, top section of the audio rack) ☐ ☐
3. Turn on video recording and Internal Cable TV (ICTV) by placing power switches labeled power 2 and power 3 on video rack bottom to ON) ☐ ☐
4. Verify that the video camera powers up. If not, turn the DC power switch to RCU located at the top rear panel of the camera ☐ ☐
5. Verify on or turn on the VCRs (3) used to record press briefings ☐ ☐
6. Activate wireless microphones as follows:
 - a. Turn on wireless mic. power switch (black button on power supply located just below top section of audio rack) ☐ ☐
 - b. Obtain wireless mic's from bottom drawer of audio rack (2 available) ☐ ☐
 - c. Replace batteries (new batteries located on back shelf) in wireless mic units ☐ ☐
7. Verify at the podium that the Audio/Visual box has the "Input Select" button set to Channel 1. ☐ ☐

NAME:

DATE:

Complete NAOPERATION

1. Coordinate setup of media cameras/equipment as necessary to ensure adequate coverage of briefings ☐ ☐
2. Record all press briefings including all question and answer sessions CONTINUOUS
3. Ensure that media is provided with access to both video and audio outputs ☐ ☐
4. Ensure that media cabling is routed through cable tray located on back stage and not run through doors ☐ ☐
5. Ensure that safety is considered during the setup of cameras and recording equipment used by the media including tripping and shock hazards ☐ ☐
6. Turn on overhead lighting as needed during briefings using the three switches located on the wall opposite to the camera ☐ ☐
7. Provide assistance to media personnel as requested CONTINUOUS

SHUTDOWN

1. Turn off power supplies:
 - Turn off green switch labeled main power switch ☐ ☐
 - Turn off red switches labeled power 2 and power 3 ☐ ☐
 - Verify camera, VCRs and sound equipment, power down ☐ ☐
 - Turn off wireless mic. power switch ☐ ☐
 - Turn off briefing area overhead lights using the 3 wall switches opposite the camera ... ☐ ☐
2. Turn off room and stage lights, lock door or verify locked, and return key to key cabinet... ☐ ☐
3. Report any equipment problems, issues or needs to JNC Administrative Manager ☐ ☐

ATTACHMENT 12: JOINT NEWS CENTER STAFF SIGN IN (SAMPLE)

JOINT NEWS CENTER STAFF SIGN IN			
POSITION		1ST SHIFT	2ND SHIFT
NMPNS JNC Director			
Spokesperson	NMPNS		
	JAFNPP		
	Oswego County		
	New York State		
	FEMA		
	NRC		
	Others		
NMPNS Technical Briefer			
NMPNS Radiological Briefer			
NMPNS JNC Writer			
NMPNS Rumor Control Coordinator			
Rumor Control Phones			
NMPNS Audio Visual (as required)			
NMPNS Security Staff			
NMPNS JNC Administrative Manager			
Clerical Support	Registration		
	Typist		
	Posters		
	Copy Room		
	Fax Machines		
	Other		
Oswego County Staff			
New York State Staff			
FEMA Liaison			
NRC Liaison			

ATTACHMENT 13: JNC SHUTDOWN CHECKLIST

Page 1 of 2

NAME:	DATE:
-------	-------

NOTE: The JNC Administrative Manager or designee shall ensure the completion of this checklist prior to leaving the JNC.

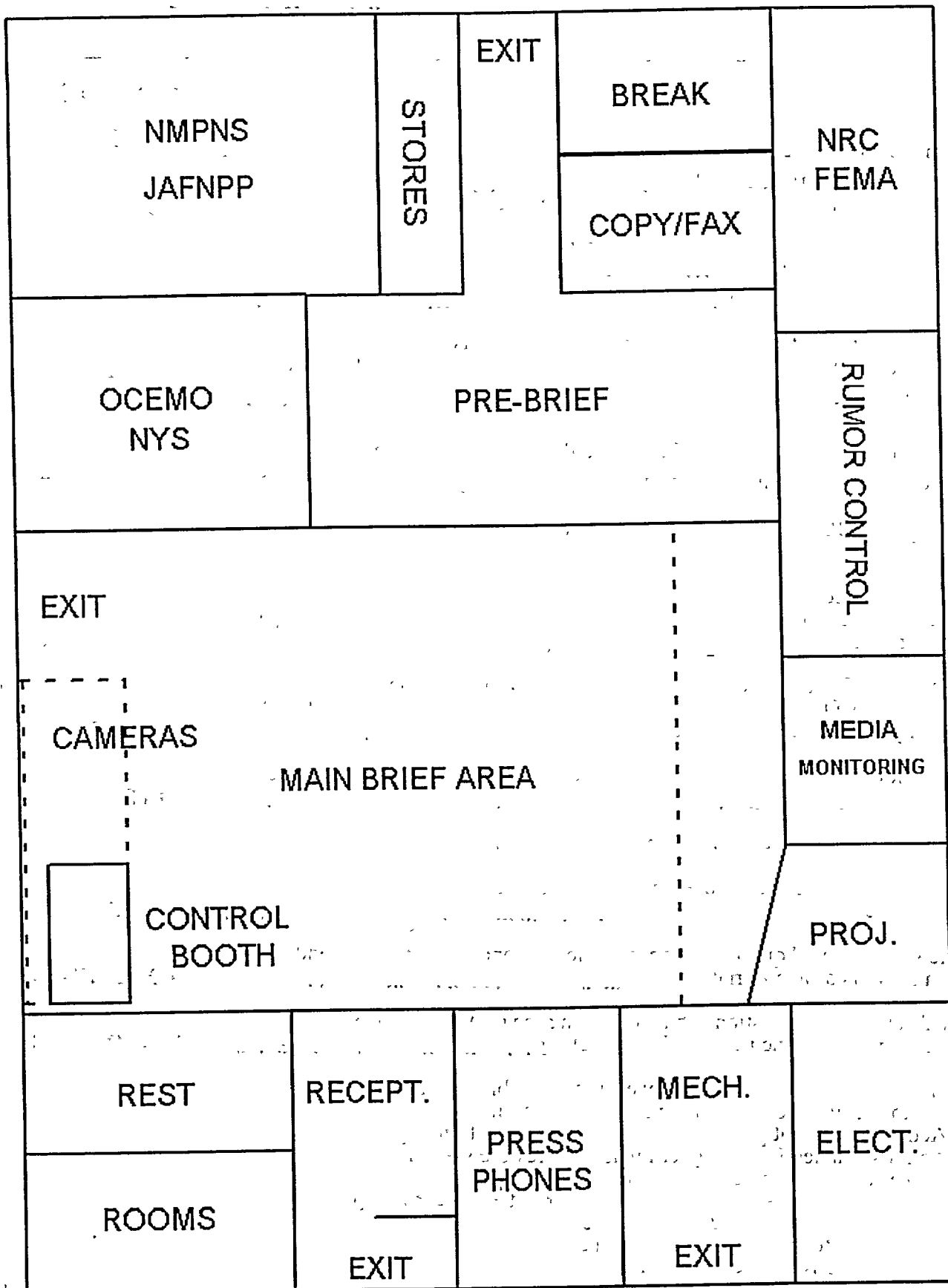
- | | <u>Complete</u> | <u>NA</u> |
|--|--------------------------|--------------------------|
| 1. Turn off lights throughout the JNC as you leave each room | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Verify water supply is available and full. If not call for service per instructions on tanks | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Call for septic tank to be pumped using number provided in electric room | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Turn off all TVs and VCRs in media monitoring room | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Shutdown or verify all computers, printers and other equipment are shutdown | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Verify Rumor Control and Press phones are hung up | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Adjust heating/cooling systems temperatures to 68 F | <input type="checkbox"/> | <input type="checkbox"/> |
| • NRC/FEMA Room | | |
| • Nine Mile Point/JAF Room | | |
| • Main Briefing Room | | |
| 8. Turn off video projector by pushing the PJ push-button (it should light) and then holding the power off push-button on the remote control for the video projector until a message appears on the screen stating, "wait a few moments" | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Perform or verify performance of Shutdown section of Attachment 11 (Control Booth) | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. Verify that all coffee pots/urns are turned off, emptied and cleaned | <input type="checkbox"/> | <input type="checkbox"/> |

NAME:	DATE:
-------	-------

Complete NA

- | | | |
|---|--------------------------|--------------------------|
| 11. Review supply needs, specifically | <input type="checkbox"/> | <input type="checkbox"/> |
| | | |
| a. Copier paper needed_____ adequate_____ | | |
| b. Bottled water needed_____ adequate_____ | | |
| c. Condiments needed_____ adequate_____ | | |
| d. Other specific needs _____ | | |
| _____ | | |
| _____ | | |
| _____ | | |
| | | |
| 12. Perform an inventory of the JNC using the JNC Inventory Form from EPMP-EPP-02,
and correct discrepancies in accordance with EPMP-EPP-02..... | <input type="checkbox"/> | <input type="checkbox"/> |
| 13. Identify any adverse conditions or supply needs | <input type="checkbox"/> | <input type="checkbox"/> |
| 14. Using Lotus Notes, place ISR request to buildings and grounds for general
cleanup/trash removal in the JNC. Record ISR #_____ | <input type="checkbox"/> | <input type="checkbox"/> |
| 15. Using Lotus Notes, place ISR request to buildings and grounds and request
they have the dumpster emptied. Record ISR #_____ | <input type="checkbox"/> | <input type="checkbox"/> |
| 16. Replace telephone used by JNC Admin. Manager (Ext. 3715) | <input type="checkbox"/> | <input type="checkbox"/> |
| 17. Verify water in the bathroom facilities is not running..... | <input type="checkbox"/> | <input type="checkbox"/> |
| 18. Verify main door is locked and other doors are locked and remain locked | <input type="checkbox"/> | <input type="checkbox"/> |
| 19. Forward this checklist to Emergency Preparedness. | <input type="checkbox"/> | <input type="checkbox"/> |

ATTACHMENT 14: JNC WORK AREAS



ATTACHMENT 15: JNC SPOKESPERSON

Page 1 of 1

NAME:	DATE:
-------	-------

- | | <u>Complete</u> | <u>NA</u> |
|--|--------------------------|--------------------------|
| 1. Inform the JNC Director that you have arrived. | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Sign in on JNC Staffing Board. | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Obtain briefing from the following personnel concerning plant/event status | | |
| • JNC Director | <input type="checkbox"/> | <input type="checkbox"/> |
| • JNC Technical Briefer | <input type="checkbox"/> | <input type="checkbox"/> |
| • JNC Radiological Briefer | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. As necessary travel to the EOF and obtain a short status update from the ED/RM concerning event status, likelihood of escalation, radioactive release status, press releases approved. | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Review previously approved and distributed press releases for information supplied to minimize chance of providing contradictory or confusing information | <input type="checkbox"/> | <input type="checkbox"/> |
| <u>NOTE:</u> Press Briefings should be conducted as soon after a major plant or emergency status change as is practical. | | |
| 6. As plant conditions or emergency status changes, request a pre-briefing session with Oswego County, New York State and the NRC (if applicable) to prepare for the press briefing. | | CONTINUOUS |
| 7. Participate in frequent pre-briefings to ensure that information that will be supplied by Oswego County, New York State and the NRC is consistent with the presentation you expect to provide. | | CONTINUOUS |
| 8. As questions arise in the pre-briefing session, provide or obtain answers as appropriate | | CONTINUOUS |
| <u>NOTE:</u> To blank projection screen, press PJ button then PC mute. | | |
| 9. When all parties are prepared, enter the main briefing room and conduct the briefing, use Figure 1 as a guide. | | CONTINUOUS |
| 10. Review unanswered questions from the question and answer period and obtain answers as appropriate. | | CONTINUOUS |
| 11. Provide answers to questions obtained during the Q/A session from the previous briefing at the next available briefing | | CONTINUOUS |
| 12. Upon termination of the emergency ensure that a briefing is planned that takes into account the following information/activities: | | |
| • Actions taken that provided for the event termination | | |
| • Actions planned following termination to restore station | | |
| • And as information becomes available or if applicable: | | |
| a. Actions necessary for the return of evacuees if applicable | | |
| b. Financial and Legal implications | | |
| c. Regulatory/governmental aspects | | |
| d. Environmental implications | | |

ATTACHMENT 15

FIGURE 1

GUIDELINES FOR A GOOD BRIEFING SESSION

- JD) 1. Introduce yourself and all parties providing information at the briefing.
- State that there will be a short overview session followed by 10 minutes of question and answers.
 - Explain that keeping the Q/A portion short will provide you with the opportunity to obtain updated information.
 - Thank everyone for coming (as appropriate)
- (SP) 2. Provide a brief overview of event(s) to date.
- (SP) 3. Ensure that Nine Mile Point LLC view point is stated (at least initially) and that it represents the priorities of::
- a. Ensuring the health and safety of the public,
 - b. Safety of the employees,
 - c. The safety of the Nuclear Station.
- (SP) 4. Initially review the categories of emergencies as necessary.(Use or point out the power point presentation as necessary).
- (SP) 5. Review changes to plant status since last briefing (as applicable).
- (SP) 6. Review changes to radioactive release status (as applicable).
- (SP) 7. If available, provide a brief financial impact review of the event.(e.g. Impact on company stock, comments from investor community etc.)
- (SP) 8. Provide answers to previously unanswered questions.
- (SP) 9. Ask Oswego County to provide their information next.
- (JD) 10. Ask New York State to provide their information next.
- (JD) 11. Ask the NRC (if available) to provide their information next.
- (JD) 12. Open the floor for a 10-minute Question and Answer session, (spokesperson to field)
- (JD) 13. After 10-minutes, state that the session is over, and provide the approximate time for next session (estimate 30-45 minutes).

Responsibilities

JD = JNC Director

SP = JNC Spokesperson

NINE MILE POINT NUCLEAR STATION
EMERGENCY PLAN MAINTENANCE PROCEDURE

EPMP-EPP-01

REVISION 15

MAINTENANCE OF EMERGENCY PREPAREDNESS

TECHNICAL SPECIFICATION REQUIRED

Approved by:
G. L. Detter


General Manager Support Services

23 Sep 02
Date

Effective Date: 9/30/2002

PERIODIC REVIEW DUE DATE: SEPTEMBER, 2002

LIST OF EFFECTIVE PAGES

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1.0 PURPOSE

To provide guidance in the scheduling of recurring emergency preparedness activities and instruction for the review and approval of emergency preparedness controlled documents and materials to ensure the effective maintenance of the Emergency Preparedness Program.

2.0 RESPONSIBILITIES

2.1 Director Emergency Preparedness

- Schedules all emergency preparedness activities within the required frequency to ensure that the Emergency Response Organization, facilities and equipment are maintained in a constant state of readiness.
- Ensures that emergency preparedness controlled documents and materials are developed, maintained, and revised in accordance with station document administrative requirements and Federal regulations and that the actions implemented by the document are consistent with the philosophy of the Emergency Preparedness Plan and Program.

2.2 The Manager-Nuclear Training

Ensures that personnel assigned to emergency plan duties receive appropriate emergency preparedness training and maintains exercise participant records as evidence of training received through active participation in an emergency exercise or drill.

2.3 The Manager-Nuclear Communications and Public Affairs

- Provides Emergency Preparedness with the support necessary to maintain the public information process, specifically:
 - a. The collection, coordination and development of public information.
 - b. The publication, distribution and historical documentation of public information.
 - c. The development and conduct of the information presentation to the news media.

3.0 PROCEDURE

3.1 Scheduling of Emergency Preparedness Activities

The Director Emergency Preparedness shall develop and maintain a Drill, Exercise and Objective Schedule and an Annual Emergency Preparedness Activities Schedule.

- 3.1.1 Schedules may include the activities and objectives listed in Attachments 1 and 2, EPMP-EPP-04 and any additional items deemed necessary to maintain the Emergency Preparedness Program.
- 3.1.2 Periodic requirements for the testing of emergency related systems and equipment may be demonstrated during a drill or exercise.
- 3.1.3 Schedules should be developed in cooperation and coordination with station and offsite organizations involved with the particular activity.
- 3.1.4 Documentation of each item completed on the Activities Schedule must be provided. This documentation may include Training Records, attendee lists, reports and/or letters to file indicating when and how the item was completed.

3.2 Drill and Exercise Report Documentation

The Director Emergency Preparedness shall ensure that drill reports are developed and issued in accordance with EPMP-EPP-04, "Emergency Exercise/Drill Procedure".

(C2) 3.3 Annual Recertification of the Nine Mile Point Emergency Preparedness Program

- 3.3.1 The Director of Emergency Preparedness shall recertify the Emergency Preparedness program by performing the following actions on an annual basis:
 - a. Verify that any new formal commitments have been or are scheduled to be incorporated into the appropriate emergency preparedness documents.
 - b. Verify that drill, exercise, audit or assessment findings have been or are scheduled to be incorporated into the appropriate emergency preparedness documents.
 - c. Review current letters of agreement to ensure consistency with the Site Emergency Plan.
 - 1. This review should include verification of the continuity of scope and effective dates of each letter of agreement.
 - d. Verify that emergency plan implementing procedures have been periodically reviewed in accordance with NIP-PRO-02.
 - e. Verify the completion of all annual drill requirements.
 - f. Perform actions necessary to correct discrepancies found in executing Steps 3.3.1.a-e of this procedure

(C2) 3.4 **Annual Technical Specification Review of Emergency Preparedness Documents**

NOTES:

1. This review is performed to satisfy Unit 1 and Unit 2 Technical Specification 6.5.2.8.
2. Qualified Technical Reviewers (QTRs) are considered plant supervisory staff.
3. QTR review performed as part of a procedure revision shall suffice as the review required by Step 3.4.1 of this procedure ONLY if changes recommended as part of that review are processed in accordance with Step 3.4.2.

3.4.1 The following shall be reviewed by plant supervisory staff on an annual basis:

- Site Emergency Plan (SEP)
- Emergency Plan implementing procedures listed in Appendix C of the SEP
 - a. The procedure review shall be documented on an Administrative Procedure Control Form in accordance with NIP-PRO-02.

3.4.2 IF the review performed in accordance with Step 3.4.1 results in recommending changes, then:

- a. The changes shall be approved by the Plant Manager
- b. The revised documents shall be transmitted to the Vice President - Nuclear Generation and the Chairman of the Safety Review and Audit Board.

3.5 **Revision of Controlled Emergency Preparedness Documents**

3.5.1 Revision to the Site Emergency Plan, EIPs and EPMPs shall undergo an effectiveness review in accordance with Attachment 3 of this procedure.

3.5.2 Revisions to emergency action levels:

- a. shall have the concurrence of the State and County
- b. may be reviewed with J. A. FitzPatrick.

3.5.3 The Director Emergency Preparedness shall ensure distribution of all approved revisions to the Emergency Plan or Implementing procedures to the NRC within 30 days of the effective date as follows:

3.5.3 (Cont)

NOTE: "No change periodic review" (NCPR) does not constitute a procedure or plan change, therefore submittal to the NRC is NOT required.

- a. One copy of any procedure change with signed original letter to:

Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555
- b. Two copies of any procedure change to NRC Region 1 office.
- c. One copy of any procedure change to NRC Resident Inspector.

3.6 Control and Use of Emergency Preparedness Job Aids

3.6.1 The Director Emergency Preparedness or designee shall review, approve and authorize use of all emergency preparedness job aids.

3.6.2 Personnel shall develop job aids on a suitable medium and ensure:

- Handwritten or drawn aids are avoided to the extent practicable.
- The information presented on the job aid is clear, legible and useable.
- If the proposed job aid provides any information that should be incorporated into the permanent procedures, initiator will provide a completed Procedure Change Evaluation (PCE) and not the job aid request.
- Job aid is not intended to bypass or reflect requirements of procedure(s).

3.6.3 Personnel requesting a job aid shall initiate an Emergency Preparedness Job Aid Form (Attachment 4) by completing the Originating Information section and submitting it to the Director Emergency Preparedness.

3.6.4 The Director Emergency Preparedness or designee shall review the request for the job aid document. If the request is rejected, inform the originator. If not, perform the following:

NOTE: Verify that the Job Aid content does not bypass the normal plant procedure change process. If a procedure change is appropriate, request the originator to complete a PCE and reject the job aid.

- a. Document approval by signing and dating the form.

3.6.4 (Cont)

- b. Assign a sequence number to the form using the Job Aid Index Log (Attachment 5).
- c. Complete the necessary information in the EP Job Aid Index Log.

3.6.5 Generate and post the job aid.

- a. Job aids shall be marked with the assigned job aid number, effective date and a reference to the originating/source document including its revision number, if applicable.
- b. Ensure that job aids are placed in close proximity to where they will be used and in a protective cover or lamination.

3.6.6 Requests to remove a posted job aid shall be submitted to the Director Emergency Preparedness by any one in the initiator organization.

3.6.7 The Director Emergency Preparedness or designee shall review to approve the removal of posted job aids or can remove any job aids, if required, by signing and dating the Removal Authorization section of the EP Job Aid Form (Attachment 4) and updating the EP Job Aid Index Log (Attachment 5).

3.6.8 The Director Emergency Preparedness shall ensure that the annual recertification review of open job aids is performed. Review includes the following:

- a. Assessment of open job aids for continued use.
- b. Verification that open job aids are current in content.
- c. Letter to file (with a copy of EP Job Aid Index Log) listing by number the Job Aids which were reviewed.

3.7 Annual Training to Offsite Agencies

3.7.1 On an annual basis, training should be offered to the following offsite agencies:

- New York State Emergency Management Office
- New York State Department of Health
- Oswego County Emergency Management

3.7.2 This training shall include:

- Review of NMP Site Emergency Plan or implementing procedures
- Classification of Emergencies/Emergency Action Levels
- Reporting Requirements
- Assessment and Protective/Corrective Actions
- Communication Networks

4.0 **DEFINITIONS**

None

5.0 **REFERENCES AND COMMITMENTS**

5.1 **Technical Specification**

5.1.1 Unit 1 Technical Specifications Sections 6.5.2.8

(CTS) 5.1.2 Unit 2 Technical Specifications Sections 6.5.2.8

5.2 **Licensee Documentation**

5.2.1 Nine Mile Point Site Emergency Plan

(ITS) 5.2.2 Nine Mile Point Unit 1 FSAR, Appendix B

5.3 **Standards, Regulations and Codes**

5.3.1 10 CFR 50.4

5.3.2 10 CFR 50.47

5.3.3 10 CFR 50.54t

5.3.4 10 CFR 50 Appendix E

5.3.5 FEMA-REP-15, Radiological Emergency Preparedness Exercise Evaluation Methodology

5.3.6 NUREG-0654/FEMA REP-1, Criteria for preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.

5.4 Policies, Programs and Procedures

- 5.4.1 NDD-EPP, Emergency Preparedness
- 5.4.2 NIP-EPP-01, Emergency Response Organization Expectations and Responsibility
- 5.4.3 NIP-RMG-01, Records Management
- 5.4.4 EPMP-EPP-02, Emergency Equipment Inventories and Checklists
- 5.4.5 EPMP-EPP-03, EDAMS Program Maintenance
- 5.4.6 EPMP-EPP-04, Emergency Exercise/Drill Procedure
- 5.4.7 EPMP-EPP-05, Emergency Preparedness Program Self Assessment
- 5.4.8 EPMP-EPP-06, Emergency Response Organizations Notification Maintenance and Surveillance
- 5.4.9 EPMP-EPP-08, Maintenance, Testing and Operation of the Oswego County Prompt Notification System

5.5 Commitments

<u>Sequence Number</u>	<u>Commitment Number</u>	<u>Description</u>
None	C1	DER C-98-0625: Proceduralize emergency medical services program maintenance and oversight functions.
None	C2	DER C-1999-0856: Periodic review and control of EP procedures misaligned with QATR/NDD-PRO/POL.
None	C3	DER C-2000-1074: NRC Performance Indicators
	C4	DER C-2000-0141: Conduct an off-hours unannounced ERO exercise requiring actual response to ERFs once every three years.
NCTS 504473	C5	NCTS 504473: NRC order dated 25-FEB-02

6.0 RECORDS REVIEW AND DISPOSITION

6.1 The following records generated by this procedure shall be maintained by Records Management for the Permanent Plant file in accordance with NIP-RMG-01, Records Management.

- Drill, Exercise and Objectives Schedule
- Annual Emergency Preparedness Activities Schedule
- Annual Independent Emergency Preparedness Program Review
- Annual Emergency Plan Recertification Review Report
- 10 CFR 50.54(q) Effectiveness Review
- Any documentation generated as a result of Step 3.1.4 of this procedure

6.2 The following records generated by this procedure are not required for retention in the Permanent Plant File:

- Emergency Preparedness Job Aid Form
- EP Job Aid Index Log

LAST PAGE

ATTACHMENT 1: RECURRING EMERGENCY PREPAREDNESS ACTIVITIES

Recurring activities are individually numbered and coded as 'BW' for Bi-weekly, 'M' for monthly, 'Q' for quarterly, 'S' for semi-annual, 'A' for annual, 'B' for biennial, 'D' for following drills and/or exercise, 'AR' for As Required.

A.	EP Program Items	Freq	Reference
1.	Develop and issue a drill report describing the scenario conducted and observations per EPMP-EPP-04	D	EPMP-EPP-04
2.	Verify telephone numbers contained in emergency procedures and revise as necessary per EPMP-EPP-02.	Q	NUREG-0654, P.10 EPMP-EPP-02
3.	Ensure an independent review of the Emergency Preparedness Program is performed.	A	10 CFR 50.54(t) NUREG-0654, P.9
4.	Ensure reviews of the Site Emergency Plan and Emergency Plan implementing procedure (listed in SEP Appendix C) in accordance with Step 3.4 of this procedure.	A	Tech Spec 6.5.2.8 EPMP-EPP-01
5.	Recertify the emergency plan in accordance with Step 3.3 of this procedure.	A	NUREG-0654, P.4 EPMP-EPP-01
6.	Ensure periodic reviews of Emergency Plan implementing procedures (listed in SEP Appendix C) are conducted in accordance with NIP-PRO-02 and NIP-PRO-03.	A	Site Emergency Plan
7.	Review the Emergency Action Levels with the State and county governmental authorities and document per EPMP-EPP-01.	A	10 CFR 50, Appendix E, Section IV, B EPMP-EPP-01
8.	Verify initial and annual requalification conducted for ERO personnel per NTP-TQS-202.	A	10 CFR 50, Appendix E, Section IV, F NUREG-0654, O.5 NTP-TQS-202
9.	Perform a recertification review of the Emergency Preparedness Job Aids.	A	EPMP-EPP-01
10.	Perform a coordinated dissemination of information to the public within EPZ to include the following: a) "Emergency Planning and You" booklet b) Telephone advertisement c) Transient population poster.	A	10 CFR 50, Appendix E, Section IV, D.2. NUREG-0654, G.1
11.	Verify performance of a familiarization of the media with the plans, radiation and points of contact for release of public information.	A	NUREG-0654, G.5
12.	Verify satisfactory completion of all required audits per EPMP-EPP-02.	M;Q and A	EPMP-EPP-02
13.	This step left intentionally blank.		
14.	Develop/maintain six year drill, exercise and objective schedule.	A	EPMP-EPP-01
15.	Develop an EP Activities Schedule.	A	EPMP-EPP-01

ATTACHMENT 1 (Cont)

B.	Periodic Tests of Facilities and Equipment	Freq	Reference
1.	Verify the conduct of the bi-weekly silent test of the siren system.	M	NUREG-0654, Appendix 3, Section C.3.h.(1) EPMP-EPP-08
2.	Conduct a test of the communications with the State and County agencies within the plume EPZ per EPMP-EPP-02. (RECS test)	M	10 CFR 50, Appendix E, Section IV.E.9.a NUREG-0654, N.2.a EPMP-EPP-02
3.	Conduct a test of the communications from the CR, TSC, and EOF to the NRC (ENS and HPN) per EPMP-EPP-02. (ENS test)	M	10 CFR 50, Appendix E, Section IV.E.9.d NUREG-0654, F.1.f EPMP-EPP-02
4.	Conduct a test of the ERO pager system.	Weekly	NUREG-0654, F.3 EPMP-EPP-06
5.	Conduct an inspection, inventory and operability test of all emergency equipment and instruments per EPMP-EPP-02.	AR	NUREG-0654, H.10 EPMP-EPP-02
6.	Verify the conduct a growl test of the siren system (performance is also required whenever maintenance has been performed) per EPMP-EPP-08.	Q	NUREG-0654, Appendix 3, Section C.3.h.(1) EPMP-EPP-08
7.	Verify the conduct of a test of the Unit 1 and Unit 2 ERDS surveillance.	Q	10 CFR 50, Appendix E, Section VI.1.
8.	Conduct a test of the communications between the CR, TSC and EOF per EPMP-EPP-02. (Dedicated Telephone test)	A	10 CFR 50, Appendix E, Section IV.E.9.c. EPMP-EPP-02
9.	Conduct a test of the communications with the State and County EOCs and the Field Monitoring Teams from the EOF per EPMP-EPP-02. (RECS and Radio/Radio Console test)	A	10 CFR 50, Appendix E, Section IV.E.9.c. EPMP-EPP-02
10.	Conduct a test of the communications with Federal EROs per EPMP-EPP-02. (ENS Test)	A	10 CFR 50, Appendix E, Section IV.E.9.b. EPMP-EPP-02
11.	Verify the conduct of an "all-blow" test of the siren system per EPMP-EPP-08.	A	NUREG-0654, Appendix 3, Section C.3.h.(1) EPMP-EPP-08
12.	Verify collection/evaluations of emergency preparedness TLDs	Q	SEP 7.3.3.b.2 S-ENVSP-4.5 NUREG 0654 II.I.
(C5) 13.	Perform a visual inspection of the Emergency Communications Equipment in the Control Rooms and the EOF (i.e. ensure radios are in chargers, etc.)	M	Commitment C5
14.	Purchase new batteries for all handheld Emergency Preparedness radios.	Every 4 years	None

ATTACHMENT 1 (Cont)

C. Miscellaneous Activities/Tasks

1.	Perform CAN surveillance and testing: <ul style="list-style-type: none"> • Perform CAN Test • Perform CAN Surveillance for Initial Responders • Send group rosters to responsible owners. 	Q	EPMP-EPP-06
2.	Develop Performance Indicators	AR	EPMP-EPP-05
3.	Distribute prompt notification system monthly summary to New York State (including year-to-date siren availability) per EPMP-EPP-08	M	EPMP-EPP-08 SEP section 6
4.	Distribute copy of annual QA/SRAB audit to State and County.	A	NUREG-0654, P.9
5.	Review all KI tablet supplies for expiration per EPMP-EPP-02.	A	SEP section 6 EPMP-EPP-02
6.	Verify completion of drill requirements via completion of required objectives, drills and reports.	A	EPMP-EPP-01 EPMP-EPP-04
7.	Update drill/exercise compliance matrix following each drill per EPMP-EPP-04	D	EPMP-EPP-04
8.	Provide annual training for State and County	A	10CFR50 Appendix E, Section F
9.	Perform surveillance of Tone Alert Radio distribution	A	EPMP-EPP-08
10.	Verify completion of TSC Ventilation Test (S-IPM-TSC-001)	Q	NUREG 0696
11.	Perform self assessment activities in accordance with EPMP-EPP-05	AR	EPMP-EPP-05
12.	Perform distribution of updates of SEP and EPIP to NRC	M	10CFR 50.4 EPMP-EPP-01
13.	Perform EDAMS surveillance in accordance with EPMP-EPP-03	A	EPMP-EPP-03
14.	Generate ERO Qualification List and: <ul style="list-style-type: none"> • Generate list of delinquent personnel • Generate a list of personnel who will become delinquent before the next list is generated • Distribute the above to each emergency facility • Distribute the above to personnel in accordance with NIP-EPP-01 	Q	NIP-EPP-01

ATTACHMENT 1 (Cont)

C. Miscellaneous Activities/Tasks (Cont)

15.	Review PPF materials stored in temporary location for transfer to permanent location.	A	NIP-RMG-01
16.	Update Site and Emergency Telephone directories in all ERFs, including Unit 1 and Unit 2 Control Rooms and Simulators and send updated directories to Oswego County and NY State Emergency Operations centers.	Q	None
17.	Conduct surveillance of the content and frequency of training provided by Oswego County.	A	10CFR50 Appendix E Section F
18.	Verify conduct of New York State dial-up system surveillance.	Q	None
19.	Schedule the following activities: <ul style="list-style-type: none">• MS-1 training and drill dates for Oswego and University Hospitals• RP Familiarization and Plant Access training for offsite fire departments.• MS-1 training for Oswego Fire Department	A	10CFR50 Appendix E Section F
20.	Service copiers and fax machines in TSC, OSC and JNC & film and microfiche readers in the OSC & EOF.	A	None
21.	Solicit changes to the following documents: <ul style="list-style-type: none">• New York State Public Health Law Article 30 and 30A• New York State CPR Title 10 Part 800• New York State Basic Life Support protocols• Central NY Basic EMT protocols. IF needed, generate changes to NTP-TQS-402 and EPMP-EPP-02.	A	None Commitment C1
22.	Verify that all licensed SROs that may fulfill an SSS role AND whose drill participation requirement will expire within 6 months are scheduled to participate in an EP drill.	M	EPMP-EPP-05 Commitment C3
23.	Test or change all cordless headset batteries in TSC, OSC, EOF, JNC and Control Rooms.	A	None
24.	Update EP Department on-call list and distribute to: <ul style="list-style-type: none">• Control Rooms• Central Regional Control Center• Network Control Center• Oswego County Emergency Management• New York State Emergency Management	S	None
25.	Conduct walkdown of emergency facilities using Attachment 6	M	None

ATTACHMENT 1 (Cont)

C. Miscellaneous Activities/Tasks (Cont)

26.	Assess ERO qualification status using Attachment 7 and the most recent ERO qualification report	M	None
27.	Verify accuracy of JNC Press Kit information	A	None
28.	Assess all actions and information in the Response Flowchart in the Significant Site Events binder (EOF) and update as needed.	A	None
29.	Update the Personnel Roster and Telephone list in the Significant Site Events binder (EOF).	M	None
30.	Assess any changes required for the RMC Manuals for the Oswego and University Hospitals.	B	None
31.	Perform semi-annual Emergency Preparedness Health Indicators	S	EPMP-EPP-05

ATTACHMENT 2: PERIODIC REQUIREMENTS FOR DRILLS AND EXERCISES

Reoccurring drills and exercises are individually numbered and coded as 'M' for monthly, 'Q' for quarterly, 'S' for semi-annual, 'A' for annual, 'B' for biennial, and 'C' for once in a cycle (every 6 years). 'AR' for As Required.

Periodic Drills and Exercises	Freq	Reference
1. Conduct a Health Physics (HP) drill involving response, monitoring, sampling and analysis activities.	S	NUREG-0654, N.2.e.(1)
2. Conduct a communications drill with the State and County EOCs and the Field Monitoring Teams from the EOF.	A	NUREG-0654, N.2.a EPMP-EPP-02
3. Conduct a medical emergency drill involving a simulated contaminated individual which contains provisions for participation by local support services agencies.	A	NUREG-0654, N.2.c
4. Conduct an environmental radiological monitoring drill involving onsite and offsite activities.	A	NUREG-0654, N.2.d
5. Conduct a Health Physics drill involving the analysis of implant liquid samples.	A	NUREG-0654, N.2.e.(2)
6. Conduct an exercise of the NMPNS Emergency Plan. Provide the opportunity for offsite authorities to participate in each exercise.	B	10 CFR 50, Appendix E, Section IV, F.2 & F.3.(f)
7. Conduct an exercise which involves a simulated release which would require a response by offsite authorities. Provide an opportunity for offsite authorities to fully participate in the exercise. At least partial participation is required of offsite authorities in every offsite exercise.	B	10 CFR 50, Appendix E, Section IV, F.3 NUREG-0654, N.1.a
8. Commence an exercise between 1800-0400.	C	NUREG-0654, N.1.b
9. Conduct exercises in various weather conditions (during different seasons).	C	NUREG-0654, N.1.b
10. Conduct an unannounced exercise (the knowledge of the exact date of the exercise is restricted to only non-players with a need to know).	AR	NUREG-0654, N.1.b FEMA GM, R1-TH-88-19
11. Conduct an Ingestion Pathway exercise. Provide the opportunity for the States to participate in the Ingestion Pathway exercise.	AR	10 CFR 50, Appendix E Section IV, F.3.(e)
12. Conduct an exercise which allows all State and local governments to fully participate together.	AR	10 CFR 50, Appendix E Section IV, F.3.(c)
(C-4) 13. Conduct an off hours, unannounced ERO exercise requiring actual response to Emergency Response Facilities	Once every three years	DER C-2000-0141

ATTACHMENT 3: 10CFR50.54(Q) EVALUATION AND EFFECTIVENESS REVIEW

Document Title: _____

Document Number: _____

Revision: _____

Preliminary Evaluation:

Does the proposed procedure/procedure change impact or alter:

- | <u>Yes</u> | <u>No</u> | <u>Item</u> |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | The assignment of responsibilities to either principal or supporting organizations or the ability to respond initially or on a continuous basis. |
| <input type="checkbox"/> | <input type="checkbox"/> | The staffing and/or responsibilities of on-shift personnel or initial activation and long term staffing of emergency response facilities. |
| <input type="checkbox"/> | <input type="checkbox"/> | The interface between onsite and offsite support response activities. |
| <input type="checkbox"/> | <input type="checkbox"/> | Arrangements for requesting and effectively using assistance or resources from offsite authorities or the accommodations for Federal, State, and/or Local staff at the Emergency Operations Facility. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Emergency Action Levels. |
| <input type="checkbox"/> | <input type="checkbox"/> | * The periodicity of communications and emergency equipment tests. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Notification process to the station Emergency Response Organization or the Local, State, or Federal entities. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Content of initial and follow-up messages. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Communications capability among principal response organizations to emergency personnel or the public. |
| <input type="checkbox"/> | <input type="checkbox"/> | Dissemination of coordinated information to the general or transient public including periodic information dissemination (brochures). |
| <input type="checkbox"/> | <input type="checkbox"/> | Emergency facilities and support equipment, used in emergency response, provisions, or maintenance. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Methods, systems and/or equipment for the assessment and monitoring of actual or potential offsite radiological consequences. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Protective Actions developed for either the Plume or Ingestion Exposure Pathways including onsite protective actions. |

* Indicates a "risk significant" planning standard.

ATTACHMENT 3 (Cont)

- ☐ ☐ Means for controlling emergency worker radiation exposures consistent with the guidelines established by the EPA.
- ☐ ☐ Arrangements for medical services for contaminated injured individuals.
- ☐ ☐ Plans for plant reentry and/or recovery organization operations.
- ☐ ☐ Periodicity of drills and/or exercises as well deficiency resolution.
- ☐ ☐ Training requirements for Emergency Response Organization or local site support personnel.
- ☐ ☐ Responsibilities for development, maintenance or review of the Plan as well as training requirements for personnel maintaining the Plan.
- ☐ ☐ Implementation of Federal regulations and requirements or Formal Emergency Preparedness commitments.

Assessment of Impact:

If any of the items of the preliminary evaluation are checked "Yes", then an effectiveness review analysis against the specific elements of 10 CFR 50.47(b), 10 CFR 50 Appendix E, other applicable regulations, requirements or commitments is required.

Documentation of the effectiveness review analysis and justification should be developed and attached to this form as follows:

Background and Scope Provides a description of the reason for and scope of the change.

Program Requirements A description of the regulation or commitment criteria, related to each change, for which the Emergency Preparedness Program must demonstrate compliance. This includes nonregulated elements described by the currently effective Emergency Plan.

Change Assessment A discussion of how each change degrades, does not affect or enhances the effectiveness and abilities of the Emergency Preparedness Program as it relates to the program requirements.

Justification A formal justification which describes reason the change is appropriate and necessary.

Change Matrix If practical, a comparison table showing both old and new wording, including step or section number references is developed. Changes which involve the incorporation of previously unaddressed elements shall mark the old wording as 'Not Applicable'. Changes which involve the deletion of an element shall mark the new wording as 'Removed from Document'.

ATTACHMENT 3 (Cont)

References Provides a list of references described in the analysis such as regulation numbers, guidance documents, information notices, inspection reports or other sources which contain criteria incorporated by the Emergency Plan.

Conclusion State the conclusion (decrease/no decrease in effectiveness) of the analysis.

Statement of Conclusion:

Does the change maintain the equivalent or establish an improved capability:

Yes No N/A
☐ ☐ ☐

To respond to an emergency or meet actions or other requirements described in the Emergency Plan.

☐ ☐ ☐

In protecting the health and safety of plant personnel and the general public in the event of an emergency.

☐ ☐ ☐

In implementation of a Federal regulation or requirement or formal commitment.

Based on this evaluation the proposed change (Circle One) **DOES / DOES NOT** decrease the effectiveness of the Emergency Plan.

The Plan, as changed, (Circle One) **CONTINUES / DOES NOT CONTINUE** to meet the standards of 10 CFR 50.47(b), the requirements 10 CFR 50 Appendix E, and all other applicable regulations, requirements, and commitments.

Disposition:

Application shall be made and approval obtained from the NRC for proposed changes that decrease the effectiveness of the Plan prior to implementation.

Evaluator (print/initial): _____

Date

Concurrence - EP (print/initial): _____

Date

ATTACHMENT 4: EMERGENCY PREPAREDNESS JOB AID FORM

(To be assigned by EP) Job Aid Number: _____

Originating Information

Name(Print):		Branch/Dept:	Date:
Last, First	Initial		
TEL. EXT# _____		Pager# _____	
Intended Use and Justification: (Attach sample Job Aid)			
PCE # _____ If procedure change required. Attach a copy.			
Reference Source Document including Revision Number:			
Affected Position(s):			
Method and Location of Posting:			

Approval Authorization

Signature:	Expiry Date if assigned.	Date:

Removal Authorization

Signature:	Date:

ATTACHMENT 5: EP JOB AID INDEX LOG

[illegible]

ATTACHMENT 6: MONTHLY FACILITY INSPECTION CHECKLIST

Month _____ Year _____ _____ EOF _____ JNC _____ OSC _____ TSC

- | | |
|--|---|
| <input type="checkbox"/> Facility cleanliness | <input type="checkbox"/> Hand/foot monitors (TSC) |
| <input type="checkbox"/> General maintenance (lights, furniture, phones) | <input type="checkbox"/> Procedures |
| <input type="checkbox"/> Wall and or radio console clocks | <input type="checkbox"/> EOPs (TSC/EOF) |
| <input type="checkbox"/> Keys/break-away box | <input type="checkbox"/> PING (TSC) |
| <input type="checkbox"/> Emergency ventilation (TSC) | <input type="checkbox"/> Portable Instrumentation (OSC/EOF) |
| <input type="checkbox"/> Storage areas | <input type="checkbox"/> Computers |
| <input type="checkbox"/> Conference areas | <input type="checkbox"/> Previous month's deficiencies reviewed/corrected |

Corrective Actions	Assigned to	Date Completed

Comments _____

Completed by: _____ Date: _____

ATTACHMENT 7: ERO QUALIFICATION LIST SURVEILLANCE

Month: _____

Completed by: _____

Instructions: Using the most recently issued "ERO Training due Report and Qualification List", assess the following:

- ☐ 1. Verify that no personnel will expire due to lapsed "Drill Participation" requirements prior to the next drill
 - ☐ a. If a person will expire before the next drill, then write a DER and find a qualified replacement in anticipation of the loss
 - ☐ b. If a person must participate in the next drill in order to remain qualified, verify that persons planned participation by whatever means
- ☐ 2. Verify that all rosterized ERO positions have at least four qualified persons. If vacancies exist, verify that personnel are in the process of being qualified to accommodate the vacancies.
- ☐ 3. Verify that all non-rosterized ERO positions have sufficient numbers of qualified responders (use a ration of 5 qualified people for each required responder). If vacancies exist, verify that personnel are in the process of being qualified to accommodate the vacancies.
- ☐ 4. Verify that all non-qualified (lapsed qualification) responders are flagged as such and that DER's have been written.
- ☐ 5. Validate all responders in the report against the current CAN list and revise CAN or ERO database as required.

Detail actions taken for all unsat items:

NINE MILE POINT NUCLEAR STATION
EMERGENCY PLAN MAINTENANCE PROCEDURE


EPMP-EPP-04

REVISION 10

EMERGENCY EXERCISE/DRILL PROCEDURE

TECHNICAL SPECIFICATION REQUIRED

Approved by:
G. L. Detter


General Manager Support Services

Sep 23, 2002
Date

Effective Date: 9/30/2002

PERIODIC REVIEW DUE DATE: AUGUST, 2003

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TABLE 1: EPTTS PRIORITY CODES.....	50

1.0 PURPOSE

The purpose of this procedure is to ensure that periodic exercises and drills are conducted to train and evaluate the emergency response capabilities of the Nine Mile Point Nuclear Station.

2.0 PRIMARY RESPONSIBILITIES

2.1 Director Emergency Preparedness

- 2.1.1 Ensures that drills and exercises are scheduled in accordance with this procedure.
- 2.1.2 Ensures that scenarios are prepared in a timely manner to support the Emergency Preparedness Branch Drill/Exercise Schedule.
- 2.1.3 Ensures that all significant deficiencies and comments noted during the drill/exercise are being addressed.
- 2.1.4 Ensures that Drill/Exercise Training Records for players and controllers are completed.
- 2.1.5 Approves the use of training sessions (e.g. table-tops/mini-drills) to substitute for drills.
- 2.1.6 Approves Table-top/mini-drill scenarios.

2.2 Emergency Preparedness Personnel

- 2.2.1 Schedules drills and exercises to meet the requirements of Attachment 1 and Attachment 2.
- 2.2.2 Schedules, develops, reviews, coordinates and conducts drills and exercises in accordance with this procedure.
- 2.2.3 Requests Operations Management participation as observers in the simulators for drills/exercises.
- 2.2.4 Prepares the Post Drill/Exercise Report.
- 2.2.5 Coordinates post-drill critiques per this procedure.
- 2.2.6 Verifies the readiness of emergency facilities for drill/exercises.
- 2.2.7 Coordinates the preparation and use of mockups in drills/exercises.
- 2.2.8 Maintain Emergency Preparedness Task Tracking System (EPTTS) in accordance with Attachment 8.

3.0 PROCEDURE

3.1 Emergency Preparedness Personnel

- a. Develop drill/exercise scenarios that incorporate elements in accordance with Attachment 1 that are demonstrated at least annually, and Attachment 2 that are demonstrated at least every 6 years as required.
- b. Should develop drill/exercise scenario packages using Attachment 3 as a guide.

NOTES: 1. Drill/exercise scenario packages are not required for tabletop drills, facility sessions or drills of limited scope (such as dose assessment or communications drills).

2. Approved Operator Re-qualification Training Simulator Scenarios may be used as drill/exercise scenario packages.

- c. Should utilize Attachment 4 as an aid in the scenario development process.
- d. Shall maintain confidentiality of the scenario contents in accordance with existing guidelines.
- e. Should utilize Attachment 5 in the development of FEMA observed exercise scenarios.
- f. Shall ensure that drills/exercises utilize qualified observers and controllers.
- g. Should validate drill and exercise scenarios as follows:
 - Utilize staff or shift operations crew to execute the scenario and develop likely crew actions and success paths.
 - Utilize qualified persons to review the scenario package. (This review may be documented using Attachment 6.)
 - Verify proper simulator operation and response by executing the final copy of the simulator instructions in as close as reasonably achievable time frame as the scenario is required to run for the actual drill/exercise.
 - Obtain scenario validation completion signatures on scenario signature page.
 - Verify response of displays is the same as projected. Specifically:
 - (i) (Unit 2 only) DRMS displays and paper data match as close as possible
 - (ii) (Unit 2 only) Stack effluent monitors on SPDS and paper data (GEMS) match as close as possible.
 - (iii) In plant radiological monitors provided by the simulator match paper data as close as possible.
 - (iv) Paper data is on same timeline as the scenario.
 - (v) Identify differences and ensure these are covered during the briefing.

3.1 (Cont)

- h. Shall ensure that last minute changes to the scenario are written in ink, dated and initialed by the Lead Controller, and communicated to other applicable controllers.
- i. Shall ensure that scenarios are approved as indicated by coversheet signatures.
- j. Should conduct quarterly notification drills in accordance with the steps for Telephone Notification System Surveillance and Testing in accordance with EPMP-EPP-06.

3.2 Drill/Exercise Observers and Controllers

3.2.1 Emergency Preparedness Personnel should ensure Controllers:

- a. Are briefed prior to the drill on all pertinent aspects of the drill and what is expected of them.
- b. Be knowledgeable in the areas they are to observe.
- c. Provide data, messages and contingency messages when acting as a controller, as needed.
- d. Ensure ERO players understand that drill data provided in a paper format should not be expected to cause alarms and or system actuations, as this data is empirically derived and not driven by the simulator. Alarms and or system actuations should be verified or effected as required.
- e. Be assigned as appropriate to monitor, evaluate, and for drills only, immediately correct any mis-cues of:
 - Site Personnel
 - Survey Teams
 - Search and Rescue Teams
 - Damage Repair Teams
 - EOF Operations
 - TSC Operations
 - OSC Operations
 - JNC Operations
 - Security Personnel
 - Control Room Operations (Simulator)
 - Procedure compliance
- f. Be visibly identified as controllers (use of arm bands and/or name-tags is acceptable).

3.2.2 Emergency Preparedness Personnel should ensure Observers:

- a. Are briefed prior to the drill on areas they are expected to observe.
- b. Be knowledgeable in the areas they are to observe.
- c. Observe actions of drill players and controllers but not interact with same until after drill termination.
- d. Be visibly identified as observers (use of arm bands and/or name-tags is acceptable).

3.3 Pre-Drill Briefs

3.3.1 Emergency Preparedness Personnel should conduct a pre-drill brief for observers/controllers approximately one (1) week prior to the drill/exercise. The briefing should include a review of the following:

- Scenario scope and objectives
- Drill schedule and extent of play
- Drill instructions-including controller/observer responsibilities
- Scenario summary and timeline
- Drill messages as appropriate
- Scenario data as appropriate
- Previous drill issues/deficiencies, including verification that past drill issues have, or have not, been addressed and or closed.

3.3.2 The Simulator Lead Controller should conduct a pre-drill brief for Operations players prior to drill/exercise start time and should include the following:

- Drill instructions
- Previous drill issues/deficiencies as they pertain to the simulator
- Simulator activities that will be evaluated
- Although a drill may be considered 'training', 'Risk Significant' activities may be evaluated against the drill objectives.

3.3.2 (Cont)

- A failure to meet specified objectives such as a risk significant activity is a significant item for consideration in qualification determination but does not necessarily imply that the individual will necessarily be disqualified.
- If the risk significant activities are to be evaluated and, following drill termination a question arises regarding SSS qualification determination in this area, then Operations Management should be notified.
- Any disagreement between EP and Operations management should be escalated to the Plant General Manager.

3.4 Post-Drill/Event Actions

3.4.1 Emergency Preparedness should conduct and document critiques immediately or as soon as practical following the drill/exercise and should:

- a. Assist with the in-facility critique conducted by the appropriate facility lead (e.g. SSS in Simulator, TSCM in TSC, etc.) for the purpose of identifying strengths, areas for improvement and other comments/conditions noted. Attendees may include the following:
 - Controllers
 - Players
 - Observers
- b. Prepare a comment summary for the roll-up critique.
- c. Collect all paperwork generated by players.
- d. Assist in the roll-up critique conducted by the appropriate facility lead (e.g., SSS in Simulator, TSCM in the TSC). The roll-up critique should include the comment summary from each facility, important lessons-learned items from all facilities and a determination if the drill/exercise requires remediation. Attendees may include the following but is not limited to:
 - Controllers
 - Facility Leads
- e. Collect all paperwork including critique summaries and Controller/Observer drill evaluations.

3.4.2 As soon as practical, conduct a critique following a real event for the purpose of identifying strengths, areas for improvement and other comments/conditions noted. Credit towards completion of drill/exercise requirements in accordance with NTP-TQS-202 may be accomplished.

(C4) 3.4.3 Emergency Preparedness Personnel, following drill/exercise critique may:

- Ensure collection of all drill/exercise player generated paperwork.
- Ensure receipt of all controller/observer paperwork.
- Develop a matrix of checklists received to document receipt of player checklists and determine missing checklist.
- For any missing player checklist contact the responsible player and request completion of the checklist. IF this cannot be or is not performed record as incomplete and determine the need for a DER.

3.4.4 The Director of Emergency Preparedness or designee should develop drill/exercise/event reports within 30 days of the completion of the drill/exercise, that:

- a. Identify observations, deficiencies, opportunities for improvement and strengths as noted by the various observer/controllers.
- b. Determine drill/exercise performance either satisfactory or unsatisfactory based upon performance of drill/exercise objectives.
- c. Determine if the drill/exercise should be rescheduled following an unsatisfactory performance.
- d. Identify all comments made by the NRC, INPO or other participating outside agencies, and the actions proposed by NMPNS to resolve those comments.
- e. Identify instances of procedure non-compliance.
- f. Contain documentation of any Deviation Event Report (DERs) generated as a result of comments/evaluations received.
- g. May contain the following sections:
 - Executive Summary
 - Drill Description
 - Strengths and Opportunities for Improvement by Facility (including DER numbers where appropriate)
 - General Opportunities for Improvement including EPTTS number and proposed actions for each. (Use Attachment 8 for development of EPTTS items.)
 - Performance Indicators accomplished for each drill.

3.4.4 (Cont)

- h. Should be provided to the appropriate management for their review.

NOTE: Review by station management is a key mechanism for informing station personnel of drill/exercise performance.

- i. Shall be retained on file in accordance with Section 6.0.

3.4.5 Emergency Preparedness Personnel should develop and maintain a drill element matrix based upon Attachment 1 and 2 of this procedure that:

- a. Details when each required annual and cyclic (6 year) element was last completed.
- b. Is updated at least yearly based upon successful completion of drills/exercise elements:
- conducted for each drill/exercise completed during the year, or
 - as a result of actual plant events following which a critique was conducted and documented, or
 - during documented training sessions.

3.4.6 Emergency Preparedness Personnel should, within two days following the conduct of a drill, exercise or event in which "credit" for completion of the training requirement for drill participation will be given:

- a. Develop a list of those personnel receiving credit to include:
- Date of the event
 - Scenario/Event Identification
 - Names of participants, with their initials signifying their participation
 - Titles/position to receive credit for
 - Social Security Number
- b. This list of personnel should be validated by the EP Director or designee (typically lead facility controller for drills/exercises)
- c. Provide this list of personnel to EP Training for inclusion in the appropriate training records.

3.5 Development/Conduct of Table-top/Mini-drills

(C3) 3.5.1 Assigned Individual should:

- a. Develop Table-top/mini-drill scenarios utilizing Attachment 3.
- b. Coordinate scheduling of required participants.
- c. Ensure the implementation plan/actions support the table-top/mini-drill objectives.
- d. Document drill participation/completion.

4.0 DEFINITIONS

4.1 Comments

Items identified during the conduct of the drill/exercise by controllers observers, participants, or other parties as appropriate.

a. Deficiency

An event or sequence of events (taken or omitted) that result in an identified objective of the drill or exercise being rated unsatisfactory (will be tracked via DER process).

b. Observation

A comment made by drill/exercise observers, controllers or participants, either as a strength or opportunity for improvement, which has been made for the purpose of improving the program.

c. Opportunities for Improvement

An identified action or sequence of actions which while not unsatisfactory, warrants improvement.

d. Strength

A perceived positive individual or group response to a drill/exercise scenario, above and beyond the expected or procedurally required actions.

4.2 Controller

Individuals assigned to various "Key" locations in order to actively direct/observe the progress of the drill/exercise by inputting drill messages and data at appropriate times and provide necessary interpretation to participants.

4.3 Drill

An instructional scenario aimed at training, testing, developing and maintaining emergency preparedness skills in a given situation.

4.4 Drill Message

A communication (usually written but may be verbal) which provides the necessary control for the drill/exercise to follow the scenario.

a. Control Message

Provide information to the participants or cause the participants to take actions to allow for the smooth progression of the scenario.

b. Contingency Message

Provide information to participants as necessary when participants either take action or fail to take actions which would change the outcome of the scenario, or provides information to participants when unavoidable events occur during the course of the scenario. (examples may include; simulator failures, inter-tie failures etc.)

4.5 Exercise

An event that is NRC observed and evaluated that tests the integrated capability of major portions of the basic elements contained within the Site Emergency Plan and respective implementing procedures.

4.6 Observer

Individual(s) assigned to monitor the activities of various emergency response groups and provide appropriate comments on personnel performance and/or facilities/hardware deficiencies. Observers should not directly interact with players during the drill.

4.7 Participation

Describes which organizations shall assist in the emergency drill/exercise and to what extent.

a. Full

Appropriate offsite local and state authorities and licensee personnel physically and actively take part in testing their integrated capability to adequately assess and respond to an accident. Participation by the Federal Emergency Management Agency (FEMA) is indicative of a full participation exercise.

4.7 (Cont)

b. Partial

Appropriate offsite authorities shall actively take part in the exercise sufficient to test direction and control functions; (i.e., protective action decision making related to emergency action levels and communication capabilities among affected state and local authorities and the licensee. May not include participation by FEMA, but may include participation by the Nuclear Regulatory Commission (NRC).

4.8 Risk Significant Activity

An activity that includes the planning standards detailed in 10CFR50.47(b)(4), (5), (9), (10), Appendix E, Section IV B, C, D(1) and D(3), which includes:

- Timely and accurate classification of the event
- Timely and accurate notification to offsite agencies
- Timely and accurate protective action recommendation (PAR) formulation and transmission to offsite agencies.

4.9 Scenario

A set of events, organized in a logical progression, presented complete with all necessary objectives, data, messages and instructions used to provide a realistic drill/exercise.

4.10 Table-top/Mini-drill

A limited scope drill that may be implemented to provide specific knowledge/skills training or to enhance the interface among specific groups.

Table-top/mini-drills may also be used to validate proposed changes to the Site Emergency Plan/Implementing Procedures.

5.0 REFERENCES AND COMMITMENTS

5.1 Technical Specifications

None

5.2 Licensee Documentation

Nine Mile Point Site Emergency Plan

5.3 Standards, Regulations, and Codes

- 5.3.1 10CFR50 Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities
- 5.3.2 10CFR50, Appendix R, Fire Protection Program for Nuclear Power Facilities Operating prior to January 1, 1979
- 5.3.3 44CFR350, U.S. Federal Emergency Management Agency, Review and Approval of State and Local Radiological Emergency Plans and Preparedness
- 5.3.4 NUREG-0654, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
- 5.3.5 NRC Inspection Module IM 82302

5.4 Policies, Programs, and Procedures

EPMP-EPP-01, Maintenance of Emergency Preparedness

5.5 Technical Information

FEMA-REP-15: Radiological Emergency Preparedness Exercise Evaluation Methodology

5.6 Commitments

<u>Sequence Number</u>	<u>Commitment Number</u>	<u>Description</u>
None	C1	DER C-2000-0141: Adverse trend in secondary responders reporting for drills
None	C2	DER C-2000-0658: Questionable Drill due dates for continuing training/qualification of the ERO
None	C3	DER C-2001-5169: Support for Operator Training
None	C4	DER C-2001-5806: 12/04/01 Emergency Exercise Checklists were not filled-out/could not be located.

6.0 RECORDS

6.1 The following records generated by this procedure shall be maintained by Records Management for the Permanent Plant File in accordance with NIP-RMG-01, Records Management.

- Drill/Exercise Scenarios
- Drill/Exercise Reports
- Drill/Exercise Evaluation/Comment Sheets
- Drill/Exercise Logs/Records used in each Emergency Facility
- Attachment 3, Table 1, Drill Controller Lists
- Attachment 3, Table 2, Drill Player Lists
- Attachment 7, Exercise/Drill Observation Sheets

6.2 The following records generated by this procedure are not required for retention in the Permanent Plant File.

- Attachment 4, Scenario Development Checklist
- Attachment 6, Scenario Review Checklist

LAST PAGE

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	NMPNS DESCRIPTION Annually, during a drill, exercise or actual event verify:	NUREG 0654 DESCRIPTION	NUREG 0654 Reference	NRC IM 82302 Reference
A1	Command and control is established and maintained in each emergency facility in accordance with EPIP-EPP-18, 23.	Identify who is in charge by title	A1d	a7
A2	Each ERF develops of a 24 hour ERF staffing schedule in accordance with EPIP-EPP-23.	Provide for 24 hour emergency response and 24 hour staffing of communication links	A1e	a7
A3	TLAM ensures governmental organizations are available to provide assistance as described in Appendix A of the Site Emergency Plan in accordance with EPIP-EPP-23.	Plan shall include Federal, State and Local written agreements, including emergency measures, exchange of information	A3	a7
A4	The TDC coordinates the development of a complete 24 hour ERF staffing schedule in accordance with EPIP-EPP-23.	Each principle organization shall provide for 24 hour staffing, and identify who is in charge of assuring continuity of resources	A4	a7
A5	Control room personnel perform their ERO duties from the control room in accordance with appropriate EPIP-EPPs	Specify onsite emergency organization for all shifts, and its relation to the responsibilities and roles of the normal staff people	B1	a8
A6	The SSS assumes ED duties, and performs actions in accordance with EPIP-EPP-18.	Designate an Emergency Plan Coordinator, on shift at all times, able to do all required actions	B2	a8
A7	The SSS completes turnover of ED duties in accordance with EPIP-EPP-18 and EPIP-EPP-23.	Identify the line of succession for the Emergency Coordinator, and conditions for assuming the job.	B3	a8
A8	The staffing of all initial responder ERO positions in each ERF is in accordance with NIP-EPP-01.	Specify the positions, titles, tasks of all major players. Use Table B-1 as a guide	B5	a8
A9	The staffing of all secondary responder ERO positions in each ERF is in accordance with NIP-EPP-01.	Specify corporate admin and tech people who will augment plant staff. See Table B-1	B7	a7

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS

ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A10	The ALM performs duties associated with logistical support in accordance with EPIP-EPP-23.	Provide for logistics support (transportation, communications, temp quarters, food, water, sanitary facilities and special equip. and supplies	B7a	a7
A11	The duties associated with technical support for re-entry / recovery are accomplished in accordance with EPIP-EPP-23 & 25.	Provide for technical support for planning and reentry/recovery	B7b	a7
A12	The ED provides appropriate interface with federal, state, and local government personnel in accordance with EPIP-EPP-18, 23.	Provide for management level interface with governmental authorities	B7c	a7
A13	The JNC Director and/or ED coordinates news releases with federal, state and local personnel prior to release to the media in accordance with EPIP-EPP-18 & 23.	Provide for the release of information to the news media coordinated with governmental authorities	B7d	a7
A14	The TLAM ensures contractors are available to provide assistance as described in Appendix A of the Site Emergency Plan in accordance with EPIP-EPP-23.	Specify contractor and private organizations who may be called in to help	B8	a7
A15	(During a drill, exercise or event involving security related activities) Police (County Sheriffs) provide assistance as needed during an emergency in accordance with EPIP-EPP-10.	Identify the services to be provided by local agencies (police, medical, ambulance, fire fighting, hospital). Provide for transport and treatment of contaminated victims	B9	a7
A16	(During a drill, exercise or event involving a medical event) Medical assistance is provided as needed during an emergency in accordance with EPIP-EPP-04.	Identify the services to be provided by local agencies (police, medical, ambulance, fire fighting, hospital). Provide for transport and treatment of contaminated victims	B9	a7

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS

ID #	NMPNS DESCRIPTION Annually, during a drill, exercise or actual event verify:	NUREG 0654 DESCRIPTION	NUREG 0654 Reference	NRC IM 82302 Reference
A17	(During a drill, exercise or event involving a medical event) Ambulance services provide assistance as needed during an emergency in accordance with EPIP-EPP-04.	Identify the services to be provided by local agencies (police, medical, ambulance , fire fighting, hospital). Provide for transport and treatment of contaminated victims	B9	a7
A18	(During a drill, exercise or event involving a fire) Volunteer fire fighters provide assistance as needed during an emergency in accordance with EPIP-EPP-28.	Identify the services to be provided by local agencies (police, medical, ambulance, fire fighting , hospital). Provide for transport and treatment of contaminated victims	B9	a7
A19	(During a drill, exercise or event involving a medical event) Hospitals provide assistance as needed during an emergency in accordance with EPIP-EPP-04.	Identify the services to be provided by local agencies (police, medical, ambulance, fire fighting, hospital). Provide for transport and treatment of contaminated victims	B9	a7
A20	(During a drill, exercise or event involving a medical event) Provide for transport and treatment of contaminated victims in accordance with EPIP-EPP-04.	Identify the services to be provided by local agencies (police, medical, ambulance, fire fighting, hospital). Provide for transport and treatment of contaminated victims.	B9	a7
A21	Control room and (when activated) TSC / EOF personnel identify and assess plant parameters, equipment status or other conditions as required to accurately classify the emergency in accordance with EPIP-EPP-01/02 and EPMP-EPP-0101/0102.	Establish an EAL scheme with instruments parameters and equipment used to determine if we meet them specified	D1	a2
A22	The appropriate Emergency Action Levels are used to classify and declare the emergency in accordance with EPIP-EPP-01/02.	EAL initiating conditions specified for all postulated accidents	D2	a2

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS

ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A23	The Communications Aide notifies the state, county and federal governments of the declaration of an emergency in accordance with EPIP-EPP-20.	Establish mutually agreed upon procedures for notification of response organizations consistent with EALs. Include means of verification of messages.	E1	a3
A24	Communications Aide notifies the ERO of the declaration of an emergency in accordance with EPIP-EPP-20.	Establish procedures for alerting notifying and mobilizing the ERO	E2	a3
A25	The SSS/ED completes the initial Part 1 Notification fact sheets in accordance with EPIP-EPP-20.	Establish in conjunction with state and county, the content of initial emergency messages. Must include: class of emergency, release information, potentially affected population, and PARs	E3	a3
A26	The updated Part 1 Notification fact sheets are completed in accordance with EPIP-EPP-20, and transmitted in accordance with EPIP-EPP-20 to the state and county.	Provide for follow up messages to include: 1. location of incident, with name and phone number of caller. 2. date/time of incident. 3. class of emergency. 4. licensee emergency actions underway. 5. recommended emergency actions including PARs. 6. request for any needed assistance. 7. prognosis for worsening of conditions or termination based upon plant information.	1. E4a 2. E4b 3. E4c 4. E4k 5. E4l 6. E4m 7. E4n	a4

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	NMPNS DESCRIPTION Annually, during a drill, exercise or actual event verify:	NUREG 0654 DESCRIPTION	NUREG 0654 Reference	NRC IM 82302 Reference
A27	The Dose Assessment staff in the EOF completes and ensures transmittal of the Part 2 Notification Fact Sheet in accordance with EPIP-EPP-20 & 23 to the state and county.	Provide for follow up messages to include: 1. type of actual or projected release and estimated duration or impact times. 2. estimate of quantity of rad materials released and point of release. 3. chemical and physical form of released materials, including quantities, concentrations of noble gases, iodides, and particulate. 4. meteorological conditions at appropriate levels (wind speed, direction to and from, stability, precipitation). 5. actual, or projected dose rates at site boundary, and projected integrated dose rates at site boundary. 6. projected dose rates and integrated dose rates at the projected peak and at 2, 5 and 10 miles including sectors affected. 7. estimate of surface contamination, in plant onsite and offsite.	1. E4d 2. E4e 3. E4f 4. E4g 5. E4h 6. E4i 7. E4j	a4
A28	The Communications Aide and or Communications Coordinator use normal and backup communications to the state and county in accordance with EPIP-EPP-20.	Establish reliable primary and backup means of communications to include provisions for 24 hr notification to and activation of State and Local ERO, and an alternate comm link.	F1a	a4
A29	The Communications Aide and or Communications Coordinator uses the RECS line in accordance with EPIP-EPP-20.	Make provisions for communications with state and local governments within the EPZs.	F1b	a4

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A30	The Communications Aide and or Technical Staff (TSC) uses the ENS line to communicate with the NRC in accordance with EPIP-EPP-20.	Make provisions for communicating with the federal government	F1c	a4
A31	Communications are established between all ERFs, state and local governments and rad monitoring teams in accordance with EPIP-EPP-17.	Provide for communications between the control room and EOF, state and local EOCs and rad monitoring teams	F1d	a4
A32	The Communications Aide contacts / activates the CAN system, and activates pagers in accordance with EPIP-EPP-20.	Provide for alerting and activating the ERO in each organization	F1e	a4
A33	The Rad/Dose Assessment personnel in the TSC / EOF communicate with the NRC on the HPN line and downwind teams in accordance with EPIP-EPP-23.	Provide for communications by the licensee with NRC HQ and regional EOC and the EOF and rad teams.	F1f	a4
A34	(During a drill, exercise or event involving a medical event) The CSO ensures communications are established with hospital from control room in accordance with EPIP-EPP-04, and between ambulance and hospital via radios	Provide for a coordinated communications link for fixed and mobile medical support	F2	a4
A35	Downwind Teams have access to, understand need for, and are capable of retrieving data from offsite monitors, and laboratory facilities in accordance with EPIP-EPP-12.	Provide for data from offsite monitoring and analysis equipment and lab facilities fixed and mobile for emergency access use.	H6c	a4
A36	Reactor Analyst uses EPIP-EPP-09 to determine extent of core damage.	Identify plant system and effluent parameters characteristic of off normal conditions (graphs of core damage)	I1	a1

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	NMPNS DESCRIPTION Annually, during a drill, exercise or actual event verify:	NUREG 0654 DESCRIPTION	NUREG 0654 Reference	NRC IM 82302 Reference
A37	Technical Assessment staff in the TSC determine extent of core damage using containment rad monitors, hydrogen concentration values or Chemistry samples in accordance with EPIP-EPP-09.	Provide for initial and continuing assessment using containment rad monitors, hydrogen concentration values and chemistry samples.	I2	a1
A38	Announcements associated with the emergency are made over the GAltronic in accordance with EPIP-EPP-18 and relayed to the NLC and Energy Information Center in accordance with EPIP-EPP-23.	Establish the means and times for notifying onsite people and people in the exclusion area including: 1. Employees not having emergency assignments. 2. Visitors. 3. Contractors and construction personnel. 4. Other people who may be in the public access areas or passing through.	1. J1a 2. J1b 3. J1c 4. J1d	a3
A39	Security ensures that personnel exit the protected area through the portal monitors, and if the portal monitors alarm, personnel are monitored by RP.	Provide for rad monitoring of evacuees	J3	a5
A40	The RPTC ensures that DCTs are qualified to use respirators, have access to them, and are provided with a briefing when they are required to be worn in accordance with EPIP-EPP-22 & EPIP-EPP-15.	Make provisions for ERO to have respiratory protection	J6a	a5
A41	The RPTC ensure DCTs and DSTs are qualified to use PCS, have access to them, and are provided with a briefing when they are required to be worn in accordance with EPIP-EPP-22.	Make provisions for ERO to have protective clothing	J6b	a5

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS

ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A42	The RAM and RPTC ensure DCTs and DSTs have access to KI, are provided with a briefing when it is required to be taken, and make appropriate decision to use KI when needed, in accordance with EPIP-EPP-22 & EPIP-EPP-15.	Make provisions for the ERO to use KI	J6c	a5
A43	The development, review, approval and distribution of PARs to state and county is in accordance with EPIP-EPP-08 & 23.	Establish the mechanism for making PARs	J7	a6
A44	(During a drill, exercise or event involving a medical event) The RP Technicians ensure dose rates are controlled in accordance with EPIP-EPP-04, for removal of injured personnel.	Establish onsite exposure guidelines consistent with EPA PAGs for removal of injured people	K1a	a5
A45	The RAM and RPTC ensure dose rates are controlled in accordance with EPIP-EPP-15, for undertaking corrective actions.	Establish onsite exposure guidelines consistent with EPA PAGs for undertaking corrective actions	K1b	a5
A46	The RPTC advises DCTs and DSTs of dose deltas, track and control exposures in accordance with EPIP-EPP-15 & 22, for performing assessment actions.	Establish onsite exposure guidelines consistent with EPA PAGs for performing assessment actions	K1c	a5
A47	(During a drill, exercise or event involving a medical event) The RP Technician ensures dose rates are controlled in accordance with EPIP-EPP-04, for performing first aid.	Establish onsite exposure guidelines consistent with EPA PAGs for providing first aid	K1d	a5
A48	(During a drill, exercise or event involving a medical event) The RP Technician ensures dose rates are controlled in accordance with EPIP-EPP-04, for performing personnel decontamination.	Establish onsite exposure guidelines consistent with EPA PAGs for performing personnel decon	K1e	a5

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS

ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A49	(During a drill, exercise or event involving a medical event) The RP Technician ensures dose rates are controlled in accordance with EPIP-EPP-04, for providing ambulance services.	Establish onsite exposure guidelines consistent with EPA PAGs for providing ambulance service	K1f	a5
A50	(During a drill, exercise or event involving a medical event) The RP Technician ensures dose rates are controlled in accordance with EPIP-EPP-04, for providing medical treatment.	Establish onsite exposure guidelines consistent with EPA PAGs for providing medical treatment	K1g	a5
A51	The RAM ensures that radiological work practices are in accordance with approved RP procedures and EPIP-EPP-15 as appropriate.	Provide for an onsite rad protection program	K2	a5
A52	The RAM and RPTC ensure that dosimetry is distributed and used, in accordance with approved RP procedures and EPIP-EPP-15.	Provide for 24 hr capability to determine dose of ERO, including distribution of dosimetry both self reading and permanent record devices	K3a	a5
A53	The RAM, the RPTC, and the ODAM ensure that dosimetry is monitored and recorded in accordance with approved RP procedures.	Ensure dosimeters are read at appropriate frequencies, and maintain records	K3b	a5
A54	The RAM and RPTC ensure that decontamination practices are in accordance with approved RP procedures.	Procedures shall specify action levels for determining the need to decon.	K5a	a5
A55	(During a drill, exercise or event involving a medical event) The RP Technician ensures decontamination and disposal of waste during a medical emergency is in accordance with EPIP-EPP-04.	Procedures shall establish the means for decon of wounds, provide for supplies, instruments, and equipment and for waste disposal	K5b	a5

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS

ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A56	The RAM and RPTC provide for onsite contamination control including area access control in accordance with approved RP procedures and EPIP-EPP-23.	Provide for onsite contamination control including area access control	K6a	a5
A57	Announcements include the words "no eating drinking smoking until habitability is confirmed" in accordance with EPIP-EPP-18.	Provide for onsite contamination control including drinking water and food supplies	K6b	a5
A58	The RAM and RPTC ensure that onsite contamination control including criteria for return of work areas to normal use are in accordance with approved RP procedures.	Provide for onsite contamination control including criteria for return of work areas to normal use.	K6c	a5
A59	(During a drill, exercise or event involving a medical event) Fire brigade members provide first aid in accordance with EPIP-EPP-04.	Provide onsite first aid capability	L2	a5
A60	Personnel collect water samples and provide for its analysis in accordance with EPIP-EPP-16.	Plant environs and radiological monitoring drill shall be done annually. Include collection and analysis of water	N2d	b13
A61	Personnel collect vegetation samples and provide for its analysis in accordance with EPIP-EPP-16.	Plant environs and radiological monitoring drill shall be done annually. Include collection and analysis of vegetation.	N2d	b13
A62	Personnel collect soil samples and provide for its analysis in accordance with EPIP-EPP-16.	Plant environs and radiological monitoring drill shall be done annually. Include collection and analysis of soil .	N2d	b13

ATTACHMENT 1

ANNUAL NINE MILE POINT DRILL/EXERCISE ELEMENTS				
ID #	<u>NMPNS DESCRIPTION</u> Annually, during a drill, exercise or actual event verify:	NUREG 0654 <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
A63	Personnel collect air samples and provide for its analysis in accordance with EPIP-EPP-07.	Plant environs and radiological monitoring drill shall be done annually. Include collection and analysis of air.	N2d	b13
A64	Airborne and liquid samples and data from direct measurements in the environment are obtained and used in accordance with EPIP-EPP-06 & 07.	Response to and analysis of elevated airborne and liquid samples and direct measurements in the environment.	N2e1	NA
A65	Reactor Analyst uses Chemistry sample data to analyze and make core damage assessments in accordance with EPIP-EPP-09.	Analysis of in-plant liquid samples with actual elevated radiation levels.	N2e2	NA

ATTACHMENT 2

NINE MILE POINT DRILL/EXERCISE ELEMENTS DEMONSTRATED DURING A SIX YEAR CYCLE				
ID #	<u>NMPNS DESCRIPTION</u> At least once every 6 years during a drill, exercise or event verify:	<u>NUREG 0654 DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
C1	The JNC is fully activated and performing all functions specified in accordance with EPIP-EPP-27	Designate points of contact and physical location for use by the media	G3a	b2
C2	NA (JNC is located next to the EOF, No additional space is required for media in the EOF)	Provide space at the EOF for the media	G3b	b2
C3	The JNC Director performs actions in accordance with EPIP-EPP-27.	Designate a spokesperson at the JNC	G4a	b2
C4	The JNC new briefings are coordinated amongst all required participants, and media briefings involve all requisite parties in accordance with EPIP-EPP-27.	Arrange for timely exchange of info between all spokespersons.	G4b	b2
C5	Rumor control is active and participating within the JNC and are being called by designated "rumor control message providers" providing rumor messages.	Establish coordinated arrangements for dealing with rumors	G4c	b2
C6	Offsite Dose Assessment Staff performs offsite dose assessment based upon containment radiation monitors using EDAMS in accordance with EPIP-EPP-08.	Establish procedures and techniques for the determination of source terms, using containment rad monitors	I3a	b14

ATTACHMENT 2

NINE MILE POINT DRILL/EXERCISE ELEMENTS DEMONSTRATED DURING A SIX YEAR CYCLE

ID #	<u>NMPNS DESCRIPTION</u> At least once every 6 years during a drill, exercise or event verify:	<u>NUREG 0654</u> <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
C7	Offsite Dose Assessment Staff performs offsite dose assessment based upon plant parameters and effluent monitors using EDAMS in accordance with EPIP-EPP-08.	Establish procedures and techniques for determination of magnitude of release based upon plant parameters and effluent monitors.	I3b	b143
C8	Offsite Dose Assessment Staff performs offsite dose assessment with varying meteorological conditions using EDAMS in accordance with EPIP-EPP-08.	Establish the relationship between the effluent monitors and onsite and offsite exposures for various meteorological conditions.	I4	b14
C9	Offsite Dose Assessment Staff performs offsite dose assessment with default values using EDAMS in accordance with EPIP-EPP-08.	Establish methodology for determination of release rate/projected doses if instrumentation used for assessment if inop/unavailable.	I6	b14
C10	Downwind survey teams are dispatched to collect and transmit data in accordance with EPIP-EPP-07.	Describe the capability and resources for field monitoring within the plume exposure pathway.	I7	b13
C11	The downwind survey teams are qualified, briefed, have appropriate monitoring and communications equipment, vehicles and procedures to provide data to the Offsite Dose Assessment Manager in order to determine location and magnitude of release in accordance with EPIP-EPP-08.	Provide the methods, equipment and expertise to make rapid assessments of the actual or projected magnitude and locations of any releases. Including field team composition, transportation, communication, monitoring equipment and estimated deployment times.	I8	b13
C12	The downwind survey teams have the equipment to detect and measure radioiodine as low as 10^{-7} uci/cc	Have the capability to detect and measure radioiodine as low as 10^{-7} uci/cc	I9	b14

ATTACHMENT 2

<p align="center">NINE MILE POINT DRILL/EXERCISE ELEMENTS DEMONSTRATED DURING A SIX YEAR CYCLE</p>				
ID #	<u>NMPNS DESCRIPTION</u> At least once every 6 years during a drill, exercise or event verify:	<u>NUREG 0654</u> <u>DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
C13	The Offsite Dose Assessment staff uses EDAMS to determine integrated dose from projected or actual dose and compares them to the PAGs in accordance with EPIP-EPP-08.	Establish means for relating various measured parameters to dose rates for key isotopes and gross rad measurements. Provisions shall be made for estimating integrated dose from the projected/actual dose and comparing them with PAGs. Details shall be provided in separate procedures.	I10	b14
C14	The Offsite Dose Assessment Manager coordinates the collection of field data with state and federal resources.	Arrange for tracking of the plume using state and federal resources	I11	b13
C15	Accountability of personnel remaining within the protected area completed within 30 minutes in accordance with EPIP-EPP-05D	Provide for accountability for all people on site and ascertain who is missing within 30 minutes	J5	b17
C16	NA State and Local requirement only	State and locals must make provisions for implementing protective measures based upon PARs consistent with EPA PAGs for food and animal feeds	J9	b12
C17	NA State and Local requirement only	Plans shall provide for means of relocation	J10g	b11
C18	NA State and Local requirement only	State shall specify protective measures to be taken for the ingestion pathway	J11	b12
C19	NA State and Local requirement only	State and locals establish decision chain for authorizing emergency exposures	K4	b4

ATTACHMENT 2

NINE MILE POINT DRILL/EXERCISE ELEMENTS DEMONSTRATED DURING A SIX YEAR CYCLE

ID #	<u>NMPNS DESCRIPTION</u> At least once every 6 years during a drill, exercise or event verify:	<u>NUREG 0654 DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
C20	(During a drill, exercise, or event involving a medical event) Oswego Hospital and or University Hospital participates in providing appropriate medical services to injured personnel having radiation exposure or uptake in accordance with appropriate Hospital Plan.	Arrange for local and backup hospital and medical services	L1	b4
C21	(During a drill, exercise or event involving a medical event) Ambulance services from Oswego County provide appropriate medical transport of contaminated injured personnel to medical facilities.	Shall arrange for transport of victims of rad accidents to medical support facilities	L4	b5
C22	ED directs event termination and entry into the recovery phase actions in accordance with EPIP-EPP-25.	Develop general plans and procedures for reentry, and recovery	M1	b18
C23	Full activation of NY State Emergency Management and Oswego County Emergency Management Offices occur.	Exercise shall include mobilization of state and local personnel and verify resources are adequate.	N1b	b1
C24	New York State and Oswego County fully participate, and the critique is conducted by New York State and Federal evaluators.	Drills/exercise must be critiqued by state and federal evaluators	N1b	b1
C25	That once per 3 years, a drill or exercise commences between the hours of 6:00pm and 4:00am that involves full staffing of the ERFs in accordance with EPIP-EPP-13.	Drills/exercise must provide for off-hours staffing (6:00pm to 4am) once per 6 year cycle.	N1b	b1

ATTACHMENT 2

NINE MILE POINT DRILL/EXERCISE ELEMENTS DEMONSTRATED DURING A SIX YEAR CYCLE

ID #	<u>NMPNS DESCRIPTION</u> At least once every 6 years during a drill, exercise or event verify:	<u>NUREG 0654 DESCRIPTION</u>	NUREG 0654 Reference	NRC IM 82302 Reference
C26	The drill or exercise is conducted in various types of weather.	Drills/exercises must be done in various weather per 6 year cycle	N1b	b1
C27	The drill or exercise is conducted in which the exact time and date has been disclosed to only a limited number of personnel, none of which is an initial responder with a role as a drill participant in the drill.	Some drills/exercise should be unannounced in a 6 year cycle	N1b	b1
C28	The drill or exercise includes participation by the fire brigade members.	Shall include fire drills in accordance with Tech Specs in a 6 year cycle	N2b	b3
C29	(During a drill, exercise or event involving a medical event) Participation by Oswego or University Hospital and local ambulance corps.	Shall include annual medical drills with provisions for participation by local support services and hospitals.	N2c	b5
C30	Done annually, see A60-63	Plant environs and radiological monitoring drill shall be done annually. Include collection and analysis of all sample media	N2d	b13
C31	The drill or exercise includes participation by Security to provide prompt access for emergency vehicles.	Establish a training program for police, security, fire	O4d	b7
C32	The drill or exercise includes participation by an Oswego County Fire Department(s).	Establish a training program for police, security, fire	O4d	b3
C33	The drill or exercise includes participation by first aid and rescue teams.	Establish a training program for first aid and rescue teams	O4f	b4

ATTACHMENT 2

NINE MILE POINT DRILL/EXERCISE ELEMENTS DEMONSTRATED DURING A SIX YEAR CYCLE

ID #	NMPNS DESCRIPTION At least once every 6 years during a drill, exercise or event verify:	NUREG 0654 DESCRIPTION	NUREG 0654 Reference	NRC IM 82302 Reference
C34	The drill or exercise includes participation by medical support services.	Establish a training program for medical support services	O4h	b5
C35	The drill or exercise includes participation by CEG personnel, as appropriate.	Establish a training program for licensee HQ people	O4i	b6

ATTACHMENT 3: GENERAL OUTLINE FOR NMPNS DRILL/EXERCISE SCENARIOS

Example of a Cover/Sign-off Page

Nine Mile Point Nuclear Station Unit _____
Emergency Preparedness Drill Scenario No. _____
for the
Emergency Preparedness Drill/Exercise
to be conducted on _____

Submitted by: _____ Date _____

Approvals: _____ Date _____
*Director Emergency Preparedness

_____ Date _____
**Plant General Manager

* Required for table-top/mini-drills.

** This signature denotes approval to commit appropriate resources to perform this Emergency Preparedness Drill. Since this individual may be a drill player he has not been allowed to view the material contained in this scenario.

Scenario Validation:

Simulator (SSS) Date _____

Radiation Protection Date _____

Chemistry Date _____

ATTACHMENT 3 (Cont)

Drill/Exercise Scope Page

This example of a Drill/Exercise Scope page is contained in the scenario after the cover/sign off page. All scenario reviewers may review this drill/exercise scope page.

Nine Mile Point Nuclear Station Unit ____

Scope of the Emergency Preparedness Exercise
to be conducted on _____

1. Personnel Accountability
2. Evacuation
3. Classification and Notification
4. In plant Radiological Monitoring
5. On-site and Off-site Radiological Monitoring
6. Off-site Dose Assessment
7. Unit 1/2 Control Room Staffing
8. TSC, OSC, EOF, and JNC Staffing
9. Damage Control Response
10. Oswego County Participation (partial)
11. New York State Participation (partial)

ATTACHMENT 3 (Cont)

Scenario Table of Contents Page

This example of a Scenario Table of Contents page may be contained in scenarios to allow for easy access of scenario sections and information. Each scenario page should have a unique page number.

Nine Mile Point Nuclear Station Unit ____
Emergency Preparedness Drill Scenario No. ____
Table of Contents

SECTION	TITLE
1.0	* OBJECTIVES
2.0	DRILL SCHEDULE AND PARTICIPANTS
3.0	* DRILL INSTRUCTIONS
4.0	* SCENARIO ASSUMPTIONS
5.0	* SCENARIO SUMMARY AND TIME LINE
6.0	* DRILL MESSAGE SUMMARY AND MESSAGES
7.0	SYSTEM/PROCESS DATA TABLES
8.0	RADIOLOGICAL DATA
9.0	METEOROLOGICAL DATA

ATTACHMENTS (As necessary)

* Required for Table-top/Mini-drills

1.0 OBJECTIVES

*State basic objectives of the proposed exercise/drill and which portions of the Emergency Plan will be tested.

2.0 DRILL SCHEDULE AND PARTICIPANTS

- State appropriate date(s), time(s), location(s) and participants of exercise/drill briefing(s), exercise and critique(s).
- State work interruption (if any) to result from the exercise/drill.

3.0 DRILL INSTRUCTIONS

- * Discuss observer and controller conduct and responsibilities
- * Discuss drill player conduct and instructions
- Identify observers by location
- * Describe the method to be used in controlling flow of exercise/drill events
- Describe reports required/written for this scenario.
- Provide a list of controllers for all drills. This list should include location, Controller or Observer name, and communication method.

4.0 SCENARIO ASSUMPTIONS

Provide a list of all appropriate assumptions considered in developing scenario.

5.0 SCENARIO SUMMARY AND TIME LINE

Prepare a summary of the drill/exercise details such as:

- * Condensed time schedule of real and simulated events
- * Simulated casualties (if any)
- Whether or not the presence of radioactive contamination is to be assumed
- Whether evacuations will be necessary
- Deployment of radiological monitoring teams (In plant and downwind)
- Supplemental Scenarios (should contain one for each malfunction)

* Required for Table-top/Mini-drills

ATTACHMENT 3 (Cont)

6.0 DRILL MESSAGE SUMMARY AND MESSAGES

- * Messages should include all contingency messages and may contain controller notes to aid in the conduct of the scenario.
- Actual Messages should be identical to summary.
- Actual Messages shall not contain any anticipated actions or expected actions which could act as a prompt.
- Public information activities to be initiated

7.0 SYSTEM/PROCESS DATA TABLES

Attachments (as necessary)

- Provide observers and participants with the necessary information, data, pre-selected situations, etc. that they will need to perform their assigned responsibilities.
- Control Room/TSC/EOF paper data should only be used if the simulator fails. The Lead Controller will prompt facility lead controllers when paper data is to be used.
- Ensure this note is included with all paper data (except chemistry data, and meteorological data) that will be provided to ERO drill/exercise players stating:
- **This data was developed using methods other than the simulator. Any expected actions such as alarms or system actuation's that would be expected to occur should be verified and or effected when the associated setpoint is reached according to the data table provided.**

8.0 RADIOLOGICAL DATA

9.0 METEOROLOGICAL DATA

ATTACHMENTS:

- Provide a list of players for the drill/exercise. This list should include location, ERO position, name, place to initial, and Social Security #. This list may be used by the training organization as proof of drill participation as required to maintain ERO qualification status. Table 2 may be used as a guide.

- * Required for Table-top/Mini-drills

ATTACHMENT 3 (Cont)

Controller/Observer List (ERO Team X)

(Example)

Drill Controller List for Site Drill/Exercise			
Location	Controller Position	Controller Name	Communication Method
Simulator	Drill Lead		Pager
Simulator	Command/Control		Ext.
Simulator	Operations		Ext.
Simulator	Communications Aide		Ext.
Simulator	Simulator Operator		Ext.
TSC	Facility Lead		Ext.
TSC	Command/Control		Ext.
TSC	Tech Data Coordinator		Ext.
TSC	Tech Staff		Ext.
Ext.	Rad Assessment		Ext.
Ext.	RX Analyst		Ext.
TSC	Maintenance Coord.		Ext.
TSC	NED		Ext.
OSC	Facility Lead		Ext.
OSC	Command/Control		Ext.
OSC	Communicator		Ext.
OSC	DCT Coordinator		Ext.
OSC	DCT Coordinator		Ext.
OSC	Ops DCT Controller		Ext.
OSC	Ops DCT Controller		Ext.
OSC	RP Team Coordinator		Ext.
STOC/PAC	Security		349-
EOF	Facility Lead		Pager
EOF	Command/Control		Pager
EOF	Rad Assessment		Pager
EOF	Communications Coord.		Pager
EOF	Technical Assessment		Pager
EOF	TLAM		Pager
EOF	ALM		Pager
EOF	EOF/JNC Liaison		Pager
EOF	Downwind Team A		Radio: Off Site Radio
EOF	Downwind Team B		Radio: Off Site Radio
EOF	Downwind Team C		Radio: Off Site Radio
EOF	Security		Pager
JNC	Facility Lead		Pager 1124
JNC	Command/Control		
JNC	Spokesperson Controller		
JNC	Rumor Control Cont.		

ATTACHMENT 3: (Cont)

(Example)

[illegible]

ATTACHMENT 4

SCENARIO DEVELOPMENT CHECKLIST		
Item	Description Drill Date: _____	Date (Week)
1	Review last 2 years of scenarios to determine EALs used & ID EALs not used <ul style="list-style-type: none"> • Vary EALs encountered during drills to ensure a wide variety of EALs are used over a 6 year period 	
2	Review industry events file for ideas	
3	Develop scope & review with EP Director	
4	Develop thumbnail timeline of scenario <ul style="list-style-type: none"> • Consider initial conditions and how these can help to get the scenario to where you want it to go • Ensure the scenario is as realistic as possible. • Consider not going to a General Emergency during off-year drills • Consider letting the players "win" 	
5	Arrange for simulator development time (time in simulator): <ul style="list-style-type: none"> • On simulator schedule and in ops training schedule 	
6	Arrange for initial simulator scenario validation time: <ul style="list-style-type: none"> • On simulator and Ops schedule • Simulator support to assist if U2 (final data download) 	
7	Arrange for Ops training or Training staff to assist in simulator	
8	Arrange for final simulator validation <ul style="list-style-type: none"> • On Ops and Simulator schedule • Arrange for Ops training or training staff to assist 	
9	Review objectives and compare with timeline to determine what inject messages may be needed to ensure objective completion	

ATTACHMENT 4 (Cont)

SCENARIO DEVELOPMENT CHECKLIST		
Item	Description Drill Date: _____	Date (Week)
10	<p>Review thumbnail timeline to determine if simulator malfunctions are available (can the simulator do what you want?). Develop:</p> <ul style="list-style-type: none"> • Scenario initial conditions • Simulator initial conditions for scenario. List: <ol style="list-style-type: none"> 1. Initial malfunction presets 2. Initial I/O presets 3. Initial Annunciator Overrides • Malfunctions (based upon thumbnail timeline) needed to cause the desired series of events. Include the following: <ol style="list-style-type: none"> 1. Malfunction # 2. Approximate time or condition when to go active 3. Initial ramp rates or values and final rates or values 4. Include statement, "Do not enter this malfunction until told to do so by Lead Controller". 5. Expected plant response 6. Expected operator response or actions 7. Expected Emergency plan response 8. Any DCT items (develop supplemental scenarios for each malfunction as required) 9. When any fuel damage occurs, amount (in %), and general methodology • If release is desired, list start and end times in scenario. Include: <ol style="list-style-type: none"> 1. Release origin 2. Data needed 3. IOs needed to ensure crew can determine a release is in progress • Scenario termination point based upon desired objectives 	
11	<p>Write definitive scenario timeline that will be used for validation. (Two ways -- one for simulator operator to use and one for notes during validation) Include:</p> <ol style="list-style-type: none"> 1. All items as appropriate 2. Inject messages 3. Announcements (if different than free played by the SSS. Example: accountability termination) 	

ATTACHMENT 4 (Cont)

SCENARIO DEVELOPMENT CHECKLIST		
Item	Description Drill Date: _____	Date (Week)
12	Start running release cases on WINDOSE. Want to determine: <ul style="list-style-type: none"> 1. Release magnitude (Ci/sec) 2. Release direction 3. Downwind release rates (mR/hr) 4. Iodine effects (typically iodine raises downwind doses too much) 5. Effects on in-plant rad monitors (U1 will have to IO some monitors. Use data downloaded for U2.) 	
13	Run 1st validation with crew. Get ideas from the crew. <ul style="list-style-type: none"> • Will the crew see what you want them to see? • Ensure no gray areas. Each EAL condition should be clearly identifiable. • Are there any more malfunctions that could be added to ensure DCTs have enough to do? • What happened to make each malfunction/equipment fail? Use this input for supplemental scenarios. Include why it was important to fail the equipment at this time in the scenario. 	
14	Using info gathered during 1st run, edit scenario as necessary. Include data obtained from WINDOSE (in plant maps, downwind maps, data tables, met data, including handouts).	
15	Develop Controller list using on-deck team. <ul style="list-style-type: none"> • Obtain extra help from Ops Training for DCT Controllers. • Obtain extra DCT Controller support as needed. • Obtain 3 downwind controllers, starting w/ NLC staff first. 	
16	Have scenario copies made for EP staff and a member of RP Staff to review at this point with a 1 week turnaround. <ul style="list-style-type: none"> • Include data obtained from WINDOSE 	
17	Arrange for briefing location preferably onsite. <ul style="list-style-type: none"> • Reserve room location • E-mail all controllers, including extras 	
18	Rewrite scenario based upon comments from EP staff. <ul style="list-style-type: none"> • Recopy for EP staff use during final validation. • Redo WINDOSE as needed 	

ATTACHMENT 4 (Cont)

SCENARIO DEVELOPMENT CHECKLIST		
Item	Description Drill Date: _____	Date (Week)
19	Run final validation. Scenario should be run with no major goofs on the timeline. <ul style="list-style-type: none"> • Shrink time between major EAL changes to shorten validation time • If U2, ensure times/data are captured & filed for downloading • If U2, denote time shrinkage (problem time) to ensure accurate "stretching" of downloaded data for preparation of paper data. 	
20	Rewrite final scenario	
21	Develop This Week In Nuclear memo. Ensure memo is in issue 1 week prior to drill briefing.	
22	Ensure drill support is obtained for simulator by the following: <ul style="list-style-type: none"> • Comm Aide • Extra CSO or designee for announcements • RP Tech • Chem Tech 	
23	Send final version to copy for briefing (35-40 copies). <ul style="list-style-type: none"> • Ensure maps, handouts, etc. are included. 	
24	Revise drill evaluation checklists <ul style="list-style-type: none"> • Include revised drill critique summary sheets 	
25	Email and voice mail to ERO Teams	
26	Conduct briefing. Include: <ul style="list-style-type: none"> • Scenarios • Checklists • Ensure handouts and checklists are distributed • Ensure attendance sheet is signed 	
27	Send drill cover page, scope & objectives to Plant Managers for review/signature	

ATTACHMENT 4 (Cont)

SCENARIO DEVELOPMENT CHECKLIST		
Item	Description Drill Date: _____	Date (Week)
28	Validate proper operation of the following 1 week prior to and the week of the drill: <ul style="list-style-type: none"> • Simulator inter-tie • Phones (ED Hotline, RECS, Tech Info Line, Drill Controller Line) • Headsets 	
29	Ensure lunches are ordered for the facilities <ul style="list-style-type: none"> • TSC/OSC/EOF and if playing JNC 	
30	Conduct Briefing, Include: <ul style="list-style-type: none"> • Controller/Observer Instructions • Review of in-plant maps, and offsite maps • Review of expected DCT actions 	
31	Run drill <ul style="list-style-type: none"> • Conduct critiques • Gather comments 	
32	Ensure post-drill facility cleanup is performed: <ul style="list-style-type: none"> • Clerical staff assigned • All drill materials gathered and saved • Forms drawers checked for replacements • Procedures re-placed • Boards cleaned as necessary • Post-drill inventories performed IAW EPMP-EPP-02 • B&G contacted for facility cleaning 	
33	Review drill comments with EP staff and develop drill report	
34	Finalize drill report	
33	Enter drill items in EPTTS	

ATTACHMENT 5: MILESTONES FOR EXERCISE OBSERVATION AND CRITIQUES

Days		
<u>Full Participation</u>	<u>Partial Participation</u>	
-90	-90	State and licensee jointly develop and submit the description, scope and objectives to be fulfilled to FEMA and NRC Regional Office respectively.
-75	-75	FEMA and NRC Regional Office complete reviews of objectives and extent of play and provide written comments after meeting with licensee/State, if necessary.
-60	-60	Complete exercise scenario package with modified objectives, schedules, exercise rules, all controller, contingency and simulation information, all data, including plant data, radiation level and release rate data, and samples of the data sheets to be presented to exercise players should be received in the Region I office and by FEMA.
-45	-45	FEMA and NRC Regions contact or meet with State and licensee to discuss modifications and complete the scenario. Agreed upon changes or modifications should be documented and distributed.
-35	-35	Federal controller's meeting to develop coordination of exercise.
-30	-30	FEMA and NRC Regions develop specific post-exercise activity schedule for debriefing and meetings with the State. Also, NRC will provide comments in writing of any additional items, if necessary.
-15	-15	The RAC Chair (and NRC team leader as available) develops evaluator action plan (where stationed, how many from each organization, what to look for).
-1	-1	All Federal observers, both on-site and off-site, meet in the exercise area to receive orientation and receive instructions.
E Day	E Day	Exercise. Evaluators hold Exit interviews with participants (at assigned locations).

ATTACHMENT 5 (Cont)

<u>Days</u>	
<u>Full Participation</u>	<u>Partial Participation</u>
E + 1	E + 1
E + 1 or 2	E + 1 or 2
Same	E to +2 Days

Evaluator debriefing conducted by RAC chair.

NRC holds onsite Exit Meeting.

Joint RAC/NRC critique, participating meeting.

General Agenda

- a. Review of on-site action by NRC.
- b. Licensee presents their views.
- c. Review of off-site actions by RAC Chairman.
- d. State and locals present their views.
- e. Review of Federal response (if applicable) by RAC Chairman.
- f. Opportunity for clarification questions or comments by licensee, State and County. (Press and public questions will not be entertained during the critique.)
- g. Meeting involving exercise participants, representatives from NRC and other appropriate federal agencies.

Same	+30 Days	Written critiques by FEMA Region to State, with copies to FEMA Headquarters and NRC, and by NRC Region to licensee, with copies to NRC Headquarters and FEMA.
------	----------	---

ATTACHMENT 6: SCENARIO REVIEW CHECKLIST

This checklist provides guidance on those items which should be considered when reviewing an emergency preparedness drill scenario.

Instructions: When reviewing a scenario ask yourself the following questions. If your answer is no to any question then what changes can you recommend to the scenario to make the answer become a yes? Please provide recommendations on Scenario Review Checklist Comments.

Checklist for scenario Date _____ Rev. _____	YES	NO/NA
1. Is the data/information correct (technically, procedurally)?	<input type="checkbox"/>	<input type="checkbox"/>
a. Does the data/information reflect the scenario events?	<input type="checkbox"/>	<input type="checkbox"/>
b. Is the data/information sufficient to assist the players in an accurate assessment of drill events?	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the data/information support the anticipated actions?	<input type="checkbox"/>	<input type="checkbox"/>
2. Is the data realistic for the situation?	<input type="checkbox"/>	<input type="checkbox"/>
3. Are the expected actions really those of a worker at Nine Mile?	<input type="checkbox"/>	<input type="checkbox"/>
4. Is all the information a player may request available?	<input type="checkbox"/>	<input type="checkbox"/>
5. Does message information consider human factors?	<input type="checkbox"/>	<input type="checkbox"/>
6. Do the messages/data give enough information to players (without prompting)?	<input type="checkbox"/>	<input type="checkbox"/>
7. Do the messages/data provide information to players without compromising the scenario chain of events?	<input type="checkbox"/>	<input type="checkbox"/>
8. Are the Mockups (if used):		
a. Realistic	<input type="checkbox"/>	<input type="checkbox"/>
b. Un-compromised	<input type="checkbox"/>	<input type="checkbox"/>
c. Located close to actual in-plant locale	<input type="checkbox"/>	<input type="checkbox"/>
d. Prepared	<input type="checkbox"/>	<input type="checkbox"/>

ATTACHMENT 6 (Cont)

		YES	NO/NA
9.	Have all success paths been identified/addressed?	<input type="checkbox"/>	<input type="checkbox"/>
10.	Has the simulator run been completed using the final copy of the scenario package?	<input type="checkbox"/>	<input type="checkbox"/>
11.	Does all data compare with what the simulator will present?	<input type="checkbox"/>	<input type="checkbox"/>
12.	Are there any data points that should not be used being displayed by the simulator (DRMS, SPDS etc.) if so, note and review during the drill briefing.	<input type="checkbox"/>	<input type="checkbox"/>

Name (print and initial)

Phone Ext.

Date

(Cont)

Phone Ext. _____

Rev. _____

Recommendations: _____

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

ATTACHMENT 7: EXERCISE/DRILL OBSERVATION SHEET
(EXAMPLE)

Observers Name: _____

Exercise/Drill Date: _____

Observers Location: _____

Exercise/Drill Title: _____

Time Drill Commenced: _____ Time Drill Terminated: _____

OBSERVATIONS, COMMENTS, AND RECOMMENDATIONS

Page ____ of ____

NOTE: Observations should include the proper and effective use of procedures, equipment and personnel.

Signature: _____

Title: _____

ATTACHMENT 8: EMERGENCY PREPAREDNESS TASK TRACKING SYSTEM (EPTTS)

1.0 Purpose

To provide additional guidance for the recording, disposition and tracking of items identified or comments made during a drill and or exercise.

2.0 Actions

2.1 Following the conduct of a drill/exercise critique, gather comments, suggestions, problem reports made by players, controllers and observers from checklists and notes and comments made at the critique.

2.2 For each comment, suggestion and/or problem report, determine if the issue requires action to resolve using the following guidance:

- a) **IF** the issue is a
- one time only problem
 - has no "lessons learned" information
 - has been adequately addressed during drill/exercise or critique,

THEN

- do not record item in drill/exercise report, issue is closed
- do not record in EPTTS

- b) **IF** the issue is a
- one time only problem
 - has "lessons learned" information
 - has been adequately addressed during drill/exercise or critique,

THEN

- record item in drill/exercise report
- list as "closed, for information only"
- do not record in EPTTS

ATTACHMENT 8 (Cont)

2.2 (Cont)

- c) IF the issue was not closed during the drill/exercise or critique

THEN

- Meet with EP Staff and determine appropriate corrective action and priority. (See Attachment 8, Table 1 for priority codes)
- Record issue in EPTTS with defined priority, due date as appropriate, and responsible EP Lead.
- Record issue in drill/exercise report, with defined corrective action in italics and EPTTS number listed.

- d) IF the issue involves corrective maintenance, repair, purchase/re-stock

THEN

- Ensure appropriate paperwork (ISR, ACR, PID) has been completed
- Record in EPTTS, with EP staff member who will track, priority code appropriate for change requested/needed, and appropriate due date
- Note the issue in the drill/exercise report, with paperwork issued for correction in italics and EPTTS number listed

- e) IF the issue involves procedure changes/enhancements/corrections

THEN

- Ensure paperwork (PCE immediate or future) has been completed and sent to procedures
- Record in EPTTS, with procedure owner as responsible lead, priority code appropriate for change requested/needed, and appropriate due date.
- Note issue in drill report, with a statement that a PCE has been written for the issue in italics and EPTTS number listed.

2.3 For each comment, suggestion and/or problem report, that was the result of or resulted in the failure to meet an objective of the drill/exercise or meets the DER initiation threshold in accordance with NIP-ECA-01:

- a) Meet with EP staff and determine wording to be used for a DER
- b) Write a DER for each item in accordance with procedure.
- c) Obtain appropriate approvals
- d) Assign the DER to the appropriate department/individual responsible
- e) Assign an EP Lead to ensure tracking of corrective actions
- f) Note issue in drill/exercise report, with DER # in italics

TABLE 1

EPTTS PRIORITY CODES			
PRIORITY CODE	DEFINITION	GUIDELINE STEP	TYPICALLY INITIATED OR DUE
A	Issue resulted in a failed objective, DER or which could prevent, significantly delay or hamper actions required by the Site Emergency Plan	#2.3	DER initiated within 14 days from date identified
B	Issue resulted in comments being generated in drill/exercise report and is considered in need of evaluation and/or corrective action	#2.2c	Evaluated/corrected within 1 year
C	Issue resulted in comments being generated in drill report, corrective actions are being tracked via other process (ISR, PCE, ACR, WO, etc.)	#2.2d, e	As appropriate based upon work schedules

NINE MILE POINT NUCLEAR STATION
EMERGENCY PLAN MAINTENANCE PROCEDURE

EPMP-EPP-05

REVISION 09

EMERGENCY PREPAREDNESS PROGRAM SELF ASSESSMENT

TECHNICAL SPECIFICATION REQUIRED

Approved by:
G. L. Detter


General Manager Support Services

3 Sep 02
Date

THIS IS A FULL REVISION

Effective Date: 09/16/2002

PERIODIC REVIEW DUE DATE AUGUST, 2003

LIST OF EFFECTIVE PAGES

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1.0 PURPOSE

This procedure outlines activities to be performed to implement an effective emergency preparedness self-assessment/corrective action program. Consistent implementation of this procedure should ensure regulatory and station requirements are satisfied and conditions adverse to program quality are identified, evaluated and corrected. The objective of this procedure within the emergency preparedness program is to promote continuous improvement.

2.0 PRIMARY RESPONSIBILITY

DIRECTOR EMERGENCY PREPAREDNESS is responsible to ensure:

- The self-assessment program routinely strives to identify low-level precursor issues or trends and that early resolution actions are taken before more significant problems occur that can adversely affect plant safety, reliability, or regulatory performance.
- Ongoing self assessments are performed in accordance with the station emergency plan and procedures.
- Periodic focus area assessments are performed that at a minimum meet the requirements of NIP-ECA-05, Focus Self-Assessment and Benchmarking.
- Monthly self-assessment performance indicators are developed consistent with those outlined in NEI-99-02, Regulatory Assessment Performance Indicator Guideline and this procedure.
- Comprehensive program assessments, {e.g. 10CFR50.54(t)} are performed consistent with regulatory requirements.
- Semi-annual performance indicators are developed and published as outlined in this procedure.

OPERATING EXPERIENCE ADVOCATE is responsible to:

- Ensure operating experience reviews are performed and documented in accordance with NIP-ECA-06, Operating Experience Program.

3.0 PROCEDURE

3.1 Ongoing Self-Assessments

3.1.1 Drill and Exercises

- a. The Director Emergency Preparedness shall ensure drills and exercises are performed in accordance with EPMP-EPP-04, Emergency Exercise/Drill Procedure.
- b. The Director Emergency Preparedness shall ensure drill and exercise findings that potentially represent conditions adverse to program quality are systematically identified, corrected and evaluated for effectiveness as appropriate and in accordance with NIP-ECA-01, Deviation Event Report.

3.1.2 Operating Experience Review

- a. The Director Emergency Preparedness shall assign an individual to perform the duties of Operating Experience Advocate (OEA).
- b. On a routine basis, The Emergency Preparedness OEA Advocate shall ensure operating experience activities are performed and documented in accordance with NIP-ECA-06, Operating Experience Program.

3.1.3 Emergency Facilities and Equipment

- a. The Director Emergency Preparedness shall ensure facility and equipment surveillance's are performed in accordance with EPMP-EPP-02, Emergency Equipment Inventories and Checklists, EPMP-EPP-03, EDAMS Program Maintenance, EPMP-EPP-06, Emergency Response Organization Notification Maintenance and Surveillance and EPMP-EPP-08, Maintenance, Testing and Operation of the Oswego County Prompt Notification System.
- b. The Director Emergency Preparedness shall ensure surveillance issues that potentially represent conditions adverse to program quality are systematically identified, corrected and evaluated for effectiveness as appropriate and in accordance with NIP-ECA-01, Deviation Event Report.

3.1.4 Emergency Preparedness Documents

- a. The Director Emergency Preparedness shall ensure a systematic review of applicable controlled documents and materials is performed in accordance with EPMP-EPP-01, Maintenance of Emergency Preparedness.
- b. The Director Emergency Preparedness shall ensure applicable controlled document and materials issues that potentially represent conditions adverse to program quality are systematically identified, corrected and evaluated for effectiveness as appropriate, and in accordance with NIP-ECA-01, Deviation Event Report.

3.1.5 Other Ongoing Assessment Techniques

NOTE: The following ongoing self-assessment techniques does not necessarily require formal advance planning or scheduling.

- a. The Director Emergency Preparedness may consider other techniques to assess program effectiveness and where appropriate initiate corrective actions. These techniques may include but are not limited to:
 - Routine Emergency Response Organization (ERO) member interface
 - Management observations of training, drills, exercises

3.1.5.a (Cont)

- Review and analysis of trend information (e.g. emergency equipment reliability issues).
- Corrective action program problem reports
- ERO performance data
- Event investigations
- Benchmarking in accordance with NIP-ECA-05, Focus Self-Assessment and Benchmarking
- Management review meetings

3.1.6 Semi-Annual Emergency Preparedness Health Indicators

- a. On a semi-annual basis the Director Emergency Preparedness shall ensure performance indicators are developed to assess the relative health of the Emergency Preparedness Program using Attachment 5.

3.2 Focus Area Self-assessments

NOTE: Focused self-assessments may be done on a recurring frequency, however, assessments may be initiated in response to situations that warrant a closer review of performance. Focused self-assessment may be triggered by:

- Trends in performance data, or problems tracked in the corrective action program
- Plant events, drills, exercises, training
- Indications of process inefficiencies
- Input from ongoing self-assessment activities or internal or external oversight groups
- Benchmarking activities revealing potential performance issues that warrant a more focused review
- New or revised regulatory requirements
- Significant change initiatives for which an early progress check is needed
- New program implementation, or program or process revision
- Emergent industry issues

3.2.1 Focus Assessment Activities

The Director Emergency Preparedness shall ensure focused self-assessments are performed in accordance with NIP-ECA-05, Focus Self-Assessment and Benchmarking.

3.2.2 Focus Self-assessment Plans

Focus self-assessment plans shall be developed consistent with the content and format specified in NIP-ECA-05, Focus Self-Assessment and Benchmarking. This shall include plans that are:

- approved
- critiqued

3.2.3 Focus Self-assessment Performance

The Director Emergency Preparedness shall ensure focus self-assessments are performed in accordance with NIP-ECA-05, Focus-Self-Assessment and Benchmarking.

3.2.4 Self-assessment Reports

The Director Emergency Preparedness shall ensure focus self-assessments reports are prepared in accordance with NIP-ECA-05, Focus-Self-Assessment and Benchmarking. These reports shall be:

- critiqued
- approved
- communicated
- distributed

3.3 Comprehensive Program Assessment

3.3.1 10CFR50.54(t) Assessment

- a. In accordance with NDD-EPP and 10CFR50.54(t), the Director Emergency Preparedness shall ensure that all program elements are reviewed by persons who have no direct responsibility for the implementation of the emergency preparedness program either at intervals not to exceed 12 months or;
 - as necessary, based on an assessment against performance indicators, and as soon as reasonably practical.
 - after a change occurs in personnel, procedures, equipment, or facilities that potentially could adversely affect emergency preparedness, but no longer than 12 months after the change.
- b. The review shall include an evaluation for adequacy of interfaces with State and County governments and of licensee drills, exercises, capabilities, and procedures.
- c. The results of the review, along with recommendations for improvements, shall be documented, reported to corporate and plant management, and retained for a period of 5 years. The part of the review involving the evaluation for adequacy of interface with State and local governments shall be provided to the appropriate State and local governments.
- d. All elements of the emergency preparedness program as defined in the Station Emergency Plan (SEP) shall be reviewed at least once every 24 months.

3.4 NRC Performance Indicators

3.4.1 Monthly NRC Performance Indicators (Pis) are to be developed as follows:

- a. Drill/Exercise Performance Indicator
 1. Calculate the Drill/Exercise Performance PI as indicated on Attachment 1.
 2. Report data to licensing in accordance with Attachment 4, Emergency Preparedness Cornerstone Data (Licensing Data Submittal Form).
 3. Report results of the assessment in accordance with EPMP-EPP-01.
- b. Emergency Response Organization Drill Participation
 1. Calculate the ERO Drill/Participation PI as indicated on Attachment 2B.
 2. Report data to licensing in accordance with Attachment 4, Emergency Preparedness Cornerstone Data (Licensing Data Submittal Form).
 3. Report the results of the assessment in accordance with EPMP-EPP-01.
- c. Alert and Notification System (ANS) Reliability
 1. Calculate the ANS Reliability PI as indicated on Attachment 3.
 2. Report data to licensing in accordance with Attachment 4, Emergency Preparedness Cornerstone Data.
 3. Report the results of the assessment in accordance with EPMP-EPP-01.

3.5 Corrective Action Program

3.5.1 Issue Identification, Reporting Criteria, Screening

- a. The Director Emergency Preparedness shall ensure emergency preparedness related deviations/events or conditions adverse to quality that have the potential for affecting the safe and reliable operation of Nine Mile Point Units 1 and 2 are entered into the station corrective action program as outlined in NIP-ECA-01, Deviation Event Report.
- b. All Performance Indicator (PI) and self assessment activity results shall be assessed for possible Deviation Event Report (DER) generation in accordance with NIP-ECA-01.

3.5.2 Issue Disposition and Correction

- a. The Director Emergency Preparedness shall ensure DERs assigned to Emergency Preparedness are dispositioned consistent with the requirements of NIP-ECA-01.

4.0 DEFINITIONS

4.1 Performance Indicators (PI):

The Regulatory Oversight Process (ROP) uses P.I. information, along with results from the reactor inspection program as the basis for assessing plant performance and determining the appropriate regulatory response. The data objectively indicates the performance of Nine Mile Point programs in specific risk significant areas. For Emergency Preparedness the indicators are:

- Drill/Exercise Performance
- ERO Drill Participation
- Alert and Notification System Reliability

4.1.1 Drill/Exercise Performance Indicator (DEP) - The percentage of all drill, exercise and actual opportunities that were performed timely and accurately during the previous eight quarters. This data should be derived from all of the following:

- Actual Emergencies
- Exercises
- Drills that involve any ERO Initial Responders or Emergency Preparedness (EP) Staff

4.1.2 Emergency Response Organization Drill Participation Indicator - Employee Response Organization (ERO) Drill Participation is the percentage the percentage of key ERO members that have participated in a drill, exercise or actual event during the previous eight quarters, as measured on the last calendar day of the quarter. This data should be derived from the following events

- Actual Emergencies
- Exercises
- Drills that involve any ERO Initial Responders or EP Staff

4.1.3 Alert and Notification System Reliability Indicator - Alert and Notification System (ANS) Reliability is the percentage of ANS sirens that are capable of performing their function as measured by periodic siren testing in the previous 12 months. This data should be derived from the following periodic siren testing as defined in EPMP-EPP-08:

- Bi-weekly Tests
- Quarterly Tests
- Annual Tests

4.1.3 (Cont)

- a. Siren Tests - the number of sirens at the site (37 at NMP) multiplied by the number of times they are tested. Example: 37 sirens tested 3 times [once by 911 Center and twice by Oswego County Emergency Management (ODEMO)] would equal 111 siren tests.
- b. Successful Siren Tests - the sum of the sirens that performed their function (as described in EPMP-EPP-08) when tested. Example: If 37 sirens were tested by 911 and 1 failed, and 37 sirens were tested twice by OCEMO and 2 failed each time they were tested, the total successful siren tests would be equal to;
 $36(911) + 35(1\text{st test OCEMO}) + 35(2\text{nd test OCEMO}) = 106$.

5.0 REFERENCES AND COMMITMENTS

5.1 Licensee Documentation

None

5.2 Technical Specifications

None

5.3 Standards, Regulations, Codes

- 5.3.1 NEI 99-02, Regulatory Assessment Performance Indicator Guideline
- 5.3.2 NUREG-0654, FEMA-REP-1, Rev. 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
- 5.3.3 10CFR50.54t
- 5.3.4 INPO, Principles for Effective Self-Assessment and Corrective Action Programs
- 5.3.5 INPO 96-009, Maintaining Emergency Preparedness Manual

5.4 Policies, Programs and Procedure

- 5.4.1 NDD-ECA, Evaluation and Corrective Action
- 5.4.2 NIP-ECA-05, Self Assessment
- 5.4.3 NIP-EPP-01, Emergency Response Organization Expectations and Responsibilities

- 5.4.4 NIP-ECA-06, Operating Experience Program
- 5.4.5 EPMP-EPP-01, Maintenance of Emergency Preparedness
- 5.4.6 EPMP-EPP-02, Emergency Equipment Inventories and Checklists
- 5.4.7 EPMP-EPP-03, EDAMS Program Maintenance
- 5.4.8 EPMP-EPP-06, Emergency Response Organization Notification Maintenance and Surveillance
- 5.4.9 EPMP-EPP-08, Maintenance, Testing and Operation of the Oswego County Prompt Notification System
- 5.4.10 EPIP-EPP-20, Emergency Notifications

6.0 RECORD REVIEW AND DISPOSITION

- 6.1 The following records generated by this procedure shall be maintained by Records Management for the Permanent Plant File in accordance with NIP-RMG-01, Records Management.

- Attachment 1: Drill/Exercise Performance Worksheet
- Attachment 2A: NEI 99-02 Key ERO Members Worksheet
- Attachment 2B: ERO Drill Participation Worksheet
- Attachment 3: Alert and Notification System Reliability Worksheet
- Attachment 4: Emergency Preparedness Cornerstone Quarterly Reporting Data

- 6.1 The following records generated by this procedure are not required for retention in the Permanent Plant File:

None

LAST PAGE

ATTACHMENT 1: DRILL/EXERCISE PERFORMANCE WORKSHEET

	Reporting Month or (1,2,3,4) Qtr	Reporting Year
A.	<u>Complete one of these sheets for each event/drill/exercise.</u>	_____
B.	<u>Enter the Drill/Exercise/Actual Emergency Date:</u>	_____
C.	<u>Determine the following</u>	
1.	Number of Emergency Classification Level (ECL) declarations: <i>Example: Typical drill, UE, Alert, SAE, GE) would equal 4</i>	_____
2.	Number of ECLs declared accurately and timely: <i>Example :If UE was not within require time frame or inaccurate do not count (Ref. EPIP-EPP-01/02)</i>	_____
3.	Number of expected notifications to the State and County for the initial and subsequent ECLs: <i>Example: For each ECL, a Part 1 should be generated and transmitted</i>	_____
4.	Number of notifications made accurately and timely to the State and County for the initial and subsequent ECLs: <i>Example: For each ECL, the Part 1 was accurately generated and transmission started within 15 minutes (Ref. EPIP-EPP-20)</i>	_____
5.	Number of Protective Action Recommendations (PARs) required to be made to the State and County. (including initial PARs and subsequent PARs): <i>Example: If a GE was declared, a Part 1 should be generated indicating initial PARs and transmitted. Subsequent to the initial PARs additional PARs were made to update the initial PARs, this would indicate that the total should be two.</i>	_____
6.	Number of PARs made to the State and County that were accurate and timely: <i>Example: PAR development is accurate and transmission started within 15 minutes following indications that conditions meet PAR threshold.</i>	_____
D.	<u>Calculate the total for this sheet:</u>	
	Step 2 + Step 4 + Step 6 = _____	
	TOTAL	
	_____ X 100 = _____ %	
	Step 1 + Step 3 + Step 5 = _____	
	TOTAL	

ATTACHMENT 1 (Cont)

Previous Eight Quarter Performance Indicator Calculation

E. Complete the following for the eight (8) quarters:

	Column A Summation of all data on all Sheets (Step 2+4+6) from each month for the quarter	Column B Summation of all data on all Sheets (Step 1+3+5) from each month for the quarter
Year/Quarter		
Total		

- List months included if part of the most recent quarter, or, list quarter that this report is being completed for on line #1 and, remainder in receding order, ie. 4th, 3rd, 2nd qtr.
- Ensure supporting documentation is attached.

F. Calculate the following using data from the table above.

$$\text{Eight Quarter Average \%} = \frac{\text{Total Column A}}{\text{Total Column B}} \times 100 = \underline{\hspace{2cm}} \%$$

Performed by: _____

Date: _____

Verified by: _____

Date: _____

ATTACHMENT 2A: ERO DRILL PARTICIPATION WORKSHEET

A. Determine the number of key ERO members requiring biennial drill participation as follows:

1. Determine the name and total number of "active" licensed SSS by contacting each Control Room Clerk for a list of current active SSSs. Place this number in the appropriate block under Step 1 on NEI-99-02 Key ERO Member Worksheet.
Example: Unit 1 has 7 names listed as active SSSs, and Unit 2 has 9 names listed as active SSSs, enter a 16 in the column next to SSS/ED.
2. Obtain a copy of the ERO Qualification List in effect on the last day of the month.
 - a. Determine number of individuals listed on the ERO Qualification List filling each of the listed key ERO positions. Place this number in the appropriate block under Step 1, Column 1 on Attachment 2A NEI 99-02 Key ERO Members. *Example: TSCM has 4 names listed on the Training Due Report filling that position, enter a 4 in the column next to TSCM.*

B. Determine the number of key ERO members who actually participated in a drill as follows:

1. Obtain a training system report for each facility (TSC, OSC, EOF and Control Room/Simulator) for drills conducted over the past 2 years.
 - The Training Record designator for drills/exercises is :
EP-DRL-(ERF)-0-0-0 Rev 0
 - Note that the Training Record designator for Mini-Drills may change each year.
2. Review the training system report and determine if each ERO person listed on the qualification/training matrix has had a drill within the past two years. Enter the associated number of personnel meeting the drill requirement for each position in Column 2 of Attachment 2A. *Example: If only 3 Offsite Dose Assessment Manager (ODAM) completed the drill requirement in the past two years enter a 3 in Column 2 next to ODA.*
3. Drill reports and actual event summaries may also be used to satisfy the drill performance requirement.

C. Calculate the data as follows:

1. Place the total number from each column on "Attachment 2B ERO Drill Participation Worksheet" where indicated.
2. Retain copies of all documents used to complete this report in the PI file. Examples of documentation that should be included are: training system reports, and Training Due Reports.

ATTACHMENT 2A (Cont)

NEI 99-02, KEY ERO MEMBERS WORKSHEET

In order to meet the Emergency Preparedness Cornerstone for Emergency Response Organization Drill Participation, the following personnel are considered "Key ERO Members" in accordance with NEI-99-02, Rev. 0 and are required to meet the two-year drill participation requirement:

Key ERO Member as Defined in NEI 99-02	Description from NEI 99-02 (and any supporting notes)	Key ERO Member as Currently exists at 9 Mile Point	# on ERO Roster (Step 1)	# Mtg Drill Req. (Step 2)
Control Room (CR)				
Shift Manager Emergency Director	Supervision of reactor operations, responsible for reclassification, notification, and determination of protective action recommendations	SSS/Emergency Director (SSS/ED)		
Shift Communicator	Provides initial offsite (state/local) notifications. (This is also the SSSs responsibility at 9 Mile Pt.)	SSS (SSS/ED)	N/A See Above	N/A See Above
Technical Support Center (TSC)				
Senior Manager	Management of plant operations/corporate resources.	Technical Support Center Manager (TSCM)		
Key Operations Support	(No description provided)	Technical Data Coordinator (RAM)		
Key Radiological Controls	Radiological effluent and environs monitoring, assessment, and dose projections.	Radiological Assessment Manager (RAM)		
Key TSC Communicator	Provides offsite (state/local), notification. (9 Mile does not perform this function out of the TSC)	N/A	N/A	N/A
Key Technical Support	(No description provided)	Technical Data Coordinator (TDC)	N/A See Above	N/A See Above
		Nuclear Engineering Design Coordinator (NED)		
Emergency Operations Facility (EOF)				
Senior Manager	Management of Corporate Resources	Emergency/Recovery Manager (ED/RM)		
Key Protective Measures	Radiological effluent and environs monitoring, assessment, and dose projections.	Offsite Dose Assessment Manager (ODAM)		
		Dose Assessment Staff		
Key EOF Communicator	Provides offsite (state/local) notifications	Communications Coordinator		
Operational Support Center (OSC)				
Key OSC Operations Manager	(No description provided)	OSC Coordinator		

ATTACHMENT 2B: ERO DRILL PARTICIPATION WORKSHEET

Reporting Month (1,2,3,4) Qtr _____

Reporting Year _____

A. Determine the following:

1. Current Number of Key ERO responders required to participate in a drill every two years (Total of Column 1, Attachment 2A) _____
2. Current Number of Key ERO responders required to participate in a drill who have participated in a drill/exercise/actual event during the previous 8 quarters. (Total of Column 2, Attachment 2A) _____

B. Calculate the following:

$$\frac{\text{Attachment 2A Column 1}}{\text{Attachment 2A Column 2}} \times 100 = \text{ } \%$$

Performed by: _____

Date: _____

Verified by: _____

Date: _____

NOTE: SAVE ORIGINALS OR COPIES OF ALL DOCUMENTATION - to be included in the verification documentation.

ATTACHMENT 3: ALERT AND NOTIFICATION SYSTEM RELIABILITY WORKSHEET

Month

(Year)

- A. Complete one sheet for each month and indicate above the month and year.
- B. From data submitted by Oswego County Emergency Management determines the following:

1. The number of **bi-weekly** siren tests conducted in accordance with EPMP-EPP-08, Attachment 2.2: _____

NOTE: SAMS activation and Intrac growl are considered separate tests.

2. The number of **quarterly** siren tests conducted in accordance with EPMP-EPP-08, Attachment 3.2: _____

3. The number of **annual** siren tests conducted in accordance with EPMP-EPP-08, Attachment 4.2: _____

4. Number of sirens successfully passing the **bi-weekly** tests in accordance with EPMP-EPP-08, Attachment 2.2: _____

5. Number of sirens successfully passing the **quarterly** tests in accordance with EPMP-EPP-08, Attachment 3.2: _____

6. Number of sirens successfully passing the **annual** tests in accordance with EPMP-EPP-08, Attachment 4.2: _____

- C. Perform the following calculation using the information above:

$$\text{Step 4} + \text{Step 5} + \text{Step 6} = \frac{\quad}{\text{TOTAL}}$$

$$\frac{\quad}{\quad} \times 100 = \quad \%$$

$$\text{Step 1} + \text{Step 2} + \text{Step 3} = \frac{\quad}{\text{TOTAL}}$$

ATTACHMENT 3 (Cont)

- D. Using the data from Step C above, and from previous 12 months complete the following table.

	Column A Successful Tests Total = (Step 4+5+6)	Column A Successful Tests Total = (Step 1+2+3)
Current monthly/year		
Month/Year		
Month/Year		
Qtr/Yr. Total of Above		
Month/year		
Month/year		
Month/year		
Qtr/Yr. Total of Above		
Month/year		
Month/year		
Month/year		
Qtr/Yr. Total of Above		
Month/year		
Month/year		
Month/year		
Qtr/Yr. Total of Above		
Month/year		
Month/year		
Month/year		
Qtr/Yr. Total of Above		
Total of all Qtrs indicated		

- E. Transcribe the totals of Columns A and Column B onto Attachment 4.
- F. Using the data from above, complete the following calculation for the 12 month average.

$$12 \text{ month average } \% = \frac{\text{Total Column A}}{\text{Total Column B}} \times 100 \text{ } _____\%$$

Performed by: _____

Date: _____

Verified by: _____

Date: _____

ATTACHMENT 4: EMERGENCY PREPAREDNESS CORNERSTONE QUARTER DATA

(Licensing Data Submittal Form)

Data Reporting Elements	Qtr: Year:	Qtr: Year	Qtr: Year	Qtr: Year	Qtr: Year	Qtr: Year	Qtr: Year	Qtr: Year	TOTAL
Drill/Exercise Performance (DEP)									
Number of drills, exercises and actual event opportunities performed timely and accurately (Attachment 1, Column A)									
Number of drills, exercises, and actual event opportunities during the reporting quarter (Attachment 1, Column B)									
ERO Drill Participation (ERO)									
Total key ERO members that have participated in a drill, exercise or actual event in the last eight quarters (Attachment 2A, Column 2)	Not Applicable								
Number of key ERO members at the end of the reporting quarter (Attachment 2A, Column 1)									
Alert and Notification System Performance (ANS)									
Number of successful ANS siren-tests during reporting quarter (Attachment 3, Column A)	Not Applicable								
Total number of ANS sirens tested during the reporting quarter (Attachment 3, Column B)									

These results were determined using the guidance in NEI 99-02 Rev 0.

Completed by: _____

Verified by: _____

Page 1 of 5

ATTACHMENT 5 (Cont)
FIGURE 1 - AREA A

Page 2 of 5

- | | |
|--|---|
| <p>A. Drill/Exercises/Actual Event Performance Criterion Worksheet:</p> <ol style="list-style-type: none"> 1. Drill/exercise or an actual emergency response was appropriate with no significant human performance problems. <ul style="list-style-type: none"> • Green - 2 or less AC DERs where (HP) Human Performance was identified as a causal factor • White - 3-4 AC DERs where HP was identified as an apparent causal factor • Yellow - 5-6 Cat 3 AC DERs where HP was identified as an apparent causal factor • Red - > 6 Cat 3 AC DERs where HP was identified as an apparent causal factor 2. Personnel were appropriately trained for the tasks performed. <ul style="list-style-type: none"> • Green - 2 or less AC DERs with training as an apparent causal factor • White - 3-4 AC DERs with training as an apparent causal factor • Yellow - 5-6 AC DERs with training as an apparent causal factor • Red - > 6 AC DERs with training as an apparent causal factor 3. Drill/exercise/actual event performance did not identify significant recurring problems or a declining trend. <ul style="list-style-type: none"> • Green - 0 AC DERs which identify a recurring problem • White - 1-2 AC DERs which identify a recurring problem • Yellow - 3-4 AC DERs which identify a recurring problem • Red - >4 AC DERs which identify a recurring problem 4. Station personnel involvement in drill and exercise activities was as required by NIP-EPP-01. <ul style="list-style-type: none"> • Green - Less than 2 DERs • White - 2-3 DERs • Yellow - 4-5 DERs • Red - > 5 DERS 5. Personnel perform job tasks in accordance with procedures. <ul style="list-style-type: none"> • Green - Less than 2 AC DERs • White - 2-3 AC DERs • Yellow - 4-5 AC DERs • Red - > 5 AC DERS | <p>Indicate
Found</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> |
|--|---|

AREA A*
Drill/Exercise/ Actual Event Performance
G - W - Y - R

Indicator Summary (provide actions taken to correct as applicable): _____

* Color is based on the most significant color for any of the above criterion (i.e., criterion 3 = yellow and all other criterion are green, indicator color will be yellow)

ATTACHMENT 5 (Cont)
FIGURE 2 - AREA B

Page 3 of 5

B. Facility and Equipment Reliability Criterion Worksheet:

**Indicate
found**

1. Primary communications systems perform as expected when tested/used. _____
 - Green - Less than 2 DERs
 - White - 2-3 DERs
 - Yellow - 4-5 DERs
 - Red - > 5 DERs

2. Secondary Communications systems perform as expected when tested/used. _____
 - Green - Less than 2 DERs
 - White - 2-3 DERs
 - Yellow - 3-4 DERs
 - Red - > 5 DERs

3. Equipment and Facility surveillance's are performed on time and are complete _____
 - Green - Less than 2 DERs
 - White - 2-3 DERs
 - Yellow - 4-5 DERs
 - Red - > 5 DERs

4. Equipment/Facility deficiencies identified are minor such that they are corrected on the spot, or in a timely fashion. _____
 - Green - Less than 2 AC DERs
 - White - 2-3 AC DERs
 - Yellow - 4-5 AC DERs
 - Red - > 5 AC DERs

5. Dose Assessment computer operability meets expectations. _____
 - Green - Less than 2 DERs
 - White - 2-3 DERs
 - Yellow - 4-5 DERs
 - Red - > 5 DERs

AREA B*
Facility and Equipment Reliability
G - W - Y - R

Indicator Summary (provide actions taken to correct as applicable): _____

* Color is based on the most significant color for any of the above criterion (i.e., criterion 3 = yellow and all other criterion are green, indicator color will be yellow)

ATTACHMENT 5 (Cont)
FIGURE 3 - AREA C

Page 4 of 5

C. Emergency Preparedness Document Quality Criterion Worksheet:-

Indicate
found

1. The Site Emergency Plan and Implementing Procedures are appropriately aligned.
 - Green - 0 DERs
 - White - 1-2 DERs
 - Yellow - 3-4 DERs
 - Red - > 4 DERs
2. There are no steps in the implementing procedures that if tested would result in an unsafe act or condition or result in inappropriate recommendations for the safety of the public or plant personnel.
 - Green - 0 AC DERs
 - White - 1-2 AC DERs
 - Yellow - 3-4 AC DERs
 - Red - > 4 AC DERs
3. Job Aids are accurate and appropriately controlled.
 - Green - Less than 2 DERs
 - White - 2-3 DERs
 - Yellow - 4-5 DERs
 - Red - > 5 DERs
4. Procedure reviews and revisions are performed in accordance with emergency plan maintenance procedures and station procedure control processes.
 - Green - Less than 2 DERs
 - White - 2-3 DERs
 - Yellow - 4-5 DERs
 - Red - > 5 DERs
5. Procedures are maintained current at the specified locations.
 - Green - Less than 2 DERs
 - White - 2-3 DERs
 - Yellow - 4-5 DERs
 - Red - > 5 DERs
6. Procedures are adequately comprehensive to effectively address emergency response needs and ensure consistent implementation.
 - Green - Less than 2 AC DERs
 - White - 2-3 AC DERs
 - Yellow - 4-5 AC DERs
 - Red - > 5 AC DERs
7. Procedures provide appropriate clarity to ensure consistent implementation.
 - Green - Less than 2 AC DERs
 - White - 2-3 AC DERs
 - Yellow - 4-5 AC DERs
 - Red - > 5 AC DERs

AREA C*
Emergency Preparedness Document Quality
G-W-Y-R

Indicator Summary (provide actions taken to correct as applicable): _____

* Color is based on the most significant color for any of the above criterion (i.e., criterion 3 = yellow and all other criterion are green, indicator color will be yellow)

D.	Self-Assessment/Corrective Action Program Effectiveness Criterion Worksheet:	Indicate # found
	1. The self-assessment program is administered in accordance with EPMP-EPP-05 and in accordance with station procedures.	_____
	<ul style="list-style-type: none"> • Green - Less than 2 DERs • White - 2-3 DERs • Yellow - 4-5 DERs • Red - > 5 DERs 	
	2. The corrective action program is administered in accordance with NIP-ECA-05 and in accordance with station procedures.	_____
	<ul style="list-style-type: none"> • Green - Less than 2 DERs • White - 2-3 DERs • Yellow - 4-5 DERs • Red - > 5 DERs 	
	3. Operating Experience database reviews effectively captures events for evaluation and once identified, effectively evaluates issues to prevent the potential for similar occurrence or to address corrective action.	_____
	<ul style="list-style-type: none"> • Green - Less than 2 AC DERs • White - 2-3 AC DERs • Yellow - 4-5 AC DERs • Red - > 5 AC DERs 	
	4. Drill/exercise or actual event reports effectively describe issues to ensure they are properly dispositioned	_____
	<ul style="list-style-type: none"> • Green - Less than 3 DERs • White - 3-4 DERs • Yellow - 5-6 DERs • Red - > 6 DERs 	
	5. Management monitoring of corrective actions ensures timely correction	_____
	<ul style="list-style-type: none"> • Green - Less than 3 DERs > 12 months old or having overall due date extended more than once • White - 3-4 DERs > 12 months old or having overall due date extended more than once • Yellow - 5-6 DERs > 12 months old or having overall due date extended more than once • Red - > 6 DERs > 12 months old or having overall due date extended more than once 	

AREA D*
Self-Assessment/ Corrective Action Program Effectiveness
G - W - Y - R

Indicator Summary (provide actions taken to correct as applicable): _____

* Color is based on the most significant color for any of the above criterion (i.e., criterion 3 = yellow and all other criterion are green, indicator color will be yellow)