

P.O. Box 63
Lycoming, New York 13093



**Constellation
Energy Group**

Nine Mile Point
Nuclear Station

February 18, 2003

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

RE: Nine Mile Point Unit 1
 Docket No. 50-220
 DPR-63

Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Gentlemen:

Enclosed please find a copy of the following procedure revision for Nine Mile Point Nuclear Station:

EPIP-EPP-25 Revision 09 Emergency Reclassification and Recovery

This procedure revision is being submitted as required by Section V to Appendix E of 10 CFR Part 50. Should you have any questions, please feel free to contact Mr. James D. Jones, Director of Emergency Preparedness at (315) 349-4486.

Very truly yours,

William Byrne for G.L.D.

Gary Detter
Manager Security & Emergency Preparedness

gd/cr

Enclosure

pc: Mr. H. J. Miller, Regional Administrator, Region I (1 copy)
 Mr. G. K. Hunegs, Senior Resident Inspector (1 copy)
 Mr. P. S. Tam, Senior Project Manager, NRR (2 copies)

A045

NINE MILE POINT NUCLEAR STATION
EMERGENCY PLAN IMPLEMENTING PROCEDURE

EPIP-EPP-25

REVISION 09

EMERGENCY RECLASSIFICATION AND RECOVERY

TECHNICAL SPECIFICATION REQUIRED

Approved by:
G. L. Detter

WC Byrne for G.L.D. 1/13/03
Manager Security and Emergency Preparedness Date

Effective Date: 01/27/2003

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1.0 PURPOSE

To provide guidance for the Station Shift Supervisor/Emergency Director (SSS/ED) on reclassifying an emergency at a lower level or terminating emergencies. To provide guidance to the Emergency Director/Recovery Manager (ED/RM) for transitioning into and establishing the recovery phase.

2.0 PRIMARY RESPONSIBILITIES

2.1 Station Shift Supervisor/Emergency Director (SSS/ED)

Performs the duties of the SSS/ED, including event termination, for an Unusual Event.

2.2 Emergency Director/Recovery Manager (ED/RM)

- a. Classifies, reclassifies and terminates all emergencies at the alert level or higher and reclassifies emergencies as needed.
- b. Oversees the development and execution of the recovery plan in the role of Recovery Manager.

2.3 Director of Emergency Preparedness

Ensures a written summary of the event is prepared.

2.4 Admin Logistics Manager (Support Group)

Performs actions as specified in EPIP-EPP-23 as they apply to the recovery organization.

2.5 Technical Liaison Advisory Manager (Support Group)

Performs actions as specified in EPIP-EPP-23, as they apply to termination and recovery.

2.6 Manager Training (Support Group)

Reports to the EOF when directed to establish and coordinate any required or needed training services to facilitate the return of the station to operational readiness.

2.7 Director Human Resources (Support Group)

Reports to the EOF when directed to establish and coordinate any required or needed Human Resource aspects of the recovery phase including occupational health and safety aspects to facilitate the return of the station to operational readiness.

2.8 Director Business Planning, Budgeting and Cost Control (Support Group)

Reports to the EOF when directed to establish and coordinate any required or needed business management aspects of the recovery phase to facilitate the return of the station to operational readiness.

2.9 Manager Quality and Performance Assessment (Support Group)

Reports to the EOF when directed to establish and coordinate any required or needed Quality Assurance aspects of the recovery phase to facilitate the return of the station to operational readiness.

2.10 CGG General Managers (Support Group)

Coordinates the necessary support from organizations that directly report to these positions for the successful termination of the emergency and subsequent return of the station to normal operations. These positions are CGG Manager of Procurement and Warehouse Services, CGG Manager of Information Technology and Telecommunications and CGG Manager of Security and Emergency Preparedness.

2.11 Plant General Manager (Functional Group)

Coordinates the necessary support from organizations that directly report to this position for the successful termination of the emergency and subsequent return of the station to normal operations.

2.12 The Manager Engineering Services (Functional Group)

Coordinates the necessary support from organizations that directly report to this position for the successful termination of the emergency and subsequent return of the station to normal operations.

3.0 PROCEDURE

3.1 Reclassification of an Emergency to a Lower Level

NOTE: Reduction in an event classification would only be warranted if the event has been over classified on the basis of it's potential, which did not occur.

3.1.1 The SSS/ED or ED/RM should determine if the emergency has been over classified and should be reclassified at a lower classification level.

3.1.2 If reclassification to a lower level is determined to be warranted, reclassify the emergency to the appropriate level in accordance with EPIP-EPP-01/02.

3.1.3 Direct completion of notifications per EPIP-EPP-20 for reclassification.

3.2 Event Termination from an Unusual Event

3.2.1 WHEN all the following conditions exist, THEN the SSS/ED shall terminate the Unusual Event.

- a. No emergency action levels exist
- b. Station radiation levels are stable or decreasing with time, as appropriate
- c. Radioactive effluents are under control or have ceased.
- d. Any fire, flooding, or other similar emergency conditions are under control or have ceased.
- e. Drywell pressure is at normal levels.

3.2.2 Direct completion of notifications per EPIP-EPP-20 for event termination.

3.2.3 Provide a verbal summary to offsite authorities (N.Y.S and Oswego County), if requested.

3.2.4 Collect all notification forms, logs and other materials generated as a result of the emergency classification and forward to the Director of Emergency Preparedness.

3.2.5 The Director of Emergency Preparedness shall:

- a. Prepare a written summary of the event and provide to offsite authorities (N.Y.S and Oswego County) within 24 hours of event termination.
- b. Perform an assessment to determine and document procedure compliance for actual events. This review should, at a minimum, include a review of the paperwork generated from such events.

3.3 Event Termination from an Alert, Site Area or General Emergency

NOTE: The ED/RM shall discuss the situation with the County, State and Federal Authorities prior to terminating the emergency.

3.3.1 WHEN all the following conditions exist, THEN the ED/RM, shall terminate the emergency AND enter the recovery phase.

- a. Station radiation levels are stable or decreasing with time, as appropriate.
- b. Radioactive effluents are under control or have ceased.
- c. Any fire, flooding, or other similar emergency conditions are under control or have ceased.

- 3.3.1 (Cont)
- d. Drywell pressure is at normal levels.
 - e. Reactor and associated systems are in a safe, stable condition, and it has been determined that the plant has the ability to achieve and maintain a cold shutdown condition.
- 3.3.2 The ED/RM shall direct completion of notifications per EPIP-EPP-20 for event termination.
- 3.3.3 The ED/RM shall utilize Attachment 1, "ED/RM Recovery Checklist", for guidance in transitioning into and establishing the recovery phase.
- 3.3.4 The Clerical staff should collect all notification forms, logs and other materials generated as a result of the emergency classification and forward to the Director of Emergency Preparedness.
- 3.3.5 The Director of Emergency Preparedness shall:
- a. Prepare a written summary of the event and provide to offsite authorities (N.Y.S and Oswego County) within 8 hours of event termination.
 - b. Perform an assessment to determine and document procedure compliance for actual events. This review should, at a minimum, include a review of the paperwork generated from such events.
- 3.3.6 The CGG Managers (as requested) shall coordinate the services and or departments under him/her as necessary to:
- a. Support the development of the recovery plan.
 - b. Return the station to service.
- 3.3.7 The Plant General Manager shall coordinate the services and or departments under him/her as necessary to:
- a. Support the development of the recovery plan.
 - b. Return the station to service.
- 3.3.8 The Manager Engineering Services shall coordinate the services and or departments under him/her as necessary to:
- a. Support the development of the recovery plan.
 - b. Return the station to service.

3.3.9 The Manager Training shall coordinate the services and or departments under him/her as necessary to:

- a. Support the development of the recovery plan.
- b. Return the station to service.

3.3.10 The Director HR shall coordinate the services and or departments under him/her as necessary to:

- a. Support the development of the recovery plan.
- b. Return the station to service.

3.3.11 The Director Business Planning, Budgeting and Cost Control shall coordinate the services and or departments under him/her as necessary to:

- a. Support the development of the recovery plan.
- b. Return the station to service.

3.3.12 The Manager Quality and Performance Assessment shall coordinate the services and or departments under him/her as necessary to:

- a. Support the development of the recovery plan.
- b. Return the station to service.

4.0 DEFINITIONS

4.1 Recovery Plan - A comprehensive plan that details both short and long term actions. The plan should address objectives, organization, facilities involved, schedule, costs, actions, testing, ALARA, Radiological Controls, Administrative requirements, Training, Security, Environmental Impact, and maintenance of emergency preparedness.

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 NRC Region I - Incident Response Supplement to NUREG-0845, Vol I

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

5.3.3 NURG-0845, NRC Region I Emergency Response Plan

5.3.4 10CFR140, Subpart E, Extraordinary Nuclear Occurrence Criteria

5.4 Policies, Programs, and Procedures

5.4.1 EPIP-EPP-01, Classification of Emergency Conditions, Unit 1

5.4.2 EPIP-EPP-02, Classification of Emergency Conditions, Unit 2

5.4.3 EPIP-EPP-20, Emergency Notifications

5.4.4 EPIP-EPP-23, Emergency Personnel Action Procedures

5.5 Commitments

<u>Sequence Number</u>	<u>Commitment Number</u>	<u>Description</u>
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None

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:

NOTE: This section only applies when records are generated as the result of an actual emergency declared at Nine Mile Point.

- Attachment 1, Recovery Checklist
- Attachment 3, Recovery Action Tasks

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

NOTE: This section only applies when records are generated as the result of activities other than actual events (such as drills and training).

- Attachment 1, Recovery Checklist
- Attachment 3, Recovery Action Tasks

LAST PAGE

ATTACHMENT 1: ED/RM RECOVERY CHECKLIST

NAME: _____ DATE: _____ UNIT: 1 2

NOTE: Ensure prerequisites for transitioning to Recovery have been met in accordance with the criteria presented in the procedure.

Check
Complete N/A

Transition into Recovery

1. Prior to establishing the Recovery Organization, the ED/RM shall initiate a conference call between the EOF and TSC involving necessary members of the EOF, TSC, OSC, Control Room and JNC. The purpose of the conference call is to collectively review the current status of the plant and determine necessary actions.
 - a. Suggested EOF participants in the conference call include:
 - ED/Recovery Manager
 - Technical Liaison and Advisory Manager
 - Administrative/Logistics Manager
 - Off-Site Dose Assessment Manager
 - JNC Director
 - Others as identified by the ED/RM
 - b. Suggested TSC participants in the conference call include:
 - TSC Manager
 - Maintenance Coordinator
 - Radiological Assessment Manager
 - Technical Data Coordinator
 - TSC/NED Coordinator
 - Others as identified by the TSC Manager
 - c. Other suggested participants in the conference call include:
 - SSS
 - OSC Coordinator
 - Plant General Manager (Functional Group)
 - Manager Engineering Services (Functional Group)
 - Manager Training (Support Group)
 - Director HR (Support Group) as needed
 - Director Business Planning, Budgeting and Cost Control (Support Group) as needed
 - Manager Quality and Performance Assessment (Support Group)
 - CGG Managers (as appropriate) (Support Group)
 - Procurement and Warehouse Services
 - Information Technology and Telecommunications
 - Security and Emergency Preparedness

NAME:

DATE:

UNIT: 1 2

NOTE: Ensure prerequisites for transitioning to Recovery have been met in accordance with the criteria presented in the procedure.

- | | <u>Check Complete</u> | <u>N/A</u> |
|--|--------------------------|-------------------------------------|
| 2. Attachment 2 is provided for use as a guide for conducting the conference call and for determining the following: | <input type="checkbox"/> | <input type="checkbox"/> |
| a. Current status of the plant | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Tasks to be accomplished | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Priorities (scheduling and planning) | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Staffing needs (internal and contract) | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Quality Assurance (additional needs) | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Specific recovery actions should be recorded on Attachment 3 | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. The ED/RM should determine the make-up of the Recovery Organization and direct an orderly transition to include: | | |
| a. Completion of an organization chart (Attachment 5), (include names for each expected position) Those positions not expected to be filled should be marked N/A | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Review of which facilities need to be staffed continuously | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Review of proposed work schedules/shift rotation for recovery organization | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Communication of transition to recovery organization to State and County officials, and ERF managers/coordinators | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. The ED/RM should develop a long term Recovery Plan based upon the assessment specified in Step 2, with assistance from the recovery organization. Attachment 4 describes the content and format for the Long Term Recovery Plan | <input type="checkbox"/> | <input type="checkbox"/> |

Long-Term Recovery Actions

- | | | |
|---|--------------------------|--------------------------|
| 6. The ED/RM should periodically review recovery actions and determine the need to revise | | |
| • Long Term Recovery Plan | <input type="checkbox"/> | <input type="checkbox"/> |
| • Recovery Organization | <input type="checkbox"/> | <input type="checkbox"/> |

NAME:

DATE:

UNIT: 1 2

NOTE: Ensure prerequisites for transitioning to Recovery have been met in accordance with the criteria presented in the procedure.

Check Complete N/A

7. The ED/RM shall ensure status and/or changes to the Recovery Plan are continually communicated to:

- Recovery Organization
- NRC (approval for changes required)
- Local Officials (NYS and Oswego County)
- Constellation Energy Group
- JNC

The following should be used as a guide and should not be considered as all-inclusive.

1.0 ENGINEERING

- a. Assessment of damage to plant equipment and systems
 - Repair priorities (Work Control/Outage Management)
 - Assignment of responsibilities (Work Control/Outage Management)
 - Staffing requirements (internal and external), or contractor/vendor
 - Quality & Performance Assessment needs
- b. Assessment of continued ability of undamaged equipment to function
- c. Development of design changes
- d. Analysis of core damage.
- e. Investigation of root cause

2.0 RADIATION

- a. Airborne release status including potential for subsequent offsite releases
- b. Identification of:
 - Affected areas
 - Restricted areas
 - Projected exposure levels
 - Additional access control areas
 - Radwaste processing requirements
 - Equipment needs
 - Staffing requirements
 - Exposures incurred to date
- c. Prioritization of:
 - Surveys
 - Decontamination efforts

2.0 (Cont)

d. Required reports (consider)

- EPA
- DEC
- FEMA
- NYS
- EPA
- Oswego County
- NRC
- Legal/claims
- Insurance Agencies
- Congress

3.0 OFFSITE CONSIDERATIONS

- a. Identification of plume footprint using dose projections
- b. Coordination of environmental sampling with the State
- c. Collection of environmental TLDs
- d. Assist State with total population dose determination
- e. Legal/Claims impact and review
- f. Determination of extraordinary nuclear occurrence (10CFR140)
- g. Insurance/liability

4.0 PUBLIC INFORMATION

Continue to provide information to the public and assist the State and County in press briefings including:

- a. Plant status
- b. PARs
- c. Insurance related information
- d. Availability of support services

4.0 (Cont)

- e. Re-location efforts
- f. Remediation efforts
- g. When evacuees may return

5.0 ADMINISTRATIVE

- a. Compile historical report
- b. Provide records management controls
- c. Assess legal ramifications
- d. Process insurance claims
- e. Identify financial impact
- f. Determine licensing status
- g. Purchasing assistance
- h. Manage contracts and control budget
- i. Determine rate impact

6.0 LOGISTICAL

- a. Conduct planning and scheduling
- b. Establish an on-site access and staging area

1.0 INTRODUCTION

Provide a brief introduction to the Recovery Plan including:

- A brief description of the event and actions taken to date.
- A brief summary of the objectives of the Recovery operation.

2.0 OBJECTIVES

2.1 Provide a detailed discussion of the objectives of the Recovery operation.

- a. Depending on the severity of the accident, the objectives may be very simple or complex.
- b. Each objective should be clearly identified and measurable.

3.0 RECOVERY ORGANIZATION

3.1 Describe the Recovery organization needed to implement the Recovery Plan.

3.2 Identify the positions in the Recovery organization, position responsibilities, and the names of people to fill the positions.

3.3 Include an organizational chart identifying the staffing levels and communications chains to be utilized.

4.0 FACILITIES INVOLVED IN RECOVERY

4.1 Describe the principle facilities involved in the Recovery operation.

- a. As a minimum, cover normal plant facilities (Control Room(s), shops, etc.), emergency response facilities (TSC, EOF, etc.), and special Recovery facilities (decontamination, water treatment, waste storage, etc.) involved in Recovery operation.

4.2 Relate the staffing levels discussed in Section 3.0 above to the facilities discussed in this section.

5.0 RECOVERY SCHEDULE AND COST ESTIMATES

Develop schedules and cost estimates for Recovery. Note that schedules and cost estimates will be under constant change and this section will constantly be under revision.

6.0 RECOVERY ACTIONS

Identify the specific actions necessary to accomplish Recovery. Recovery actions may be documented using Attachment 3. Recovery Actions may include, but are not limited to, the following:

6.1 Control of operations

6.2 Repair or replacement of damaged equipment

6.3 Decontamination

6.4 Development of procedures

- Operations
- Test and Inspection
- Maintenance
- Decontamination
- Radwaste
- Startup

6.5 Procurement of general and/or specialized materials and equipment

6.6 Processing and/or storage of contaminated material and wastes

6.7 Preparation of licensing documents including NRC approvals

6.8 Meetings

6.9 Interface with media, federal, state and local agencies/organizations

6.10 Control of normal maintenance

6.11 Testing

- NMPNS ordered or requested
- Externally ordered or requested
- Surveillance Testing
- Technical Specification requirements

6.12 ALARA Program

6.13 Reports and record management

6.14 Radiological controls

- Surveys (Plant, Site and/or Environs)
- RWPs
- Dosimetry
- Exposure control
- Bioassay analysis

6.15 Administrative controls

- Contracts and budgets
- Processing of paperwork (reviewing of data, report distribution, etc.)

6.16 Training requirements necessary to support recovery activities

6.17 Security

6.18 Environmental impact studies and effects

- Evaluation against 10CFR140, Subpart E, Extraordinary Nuclear Occurrence Criteria
- Total population dose estimation

6.19 Maintaining emergency preparedness

6.20 QA reviews of entire process

ATTACHMENT 5: RECOVERY ORGANIZATION

