



May 22, 2003

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

**MONTICELLO NUCLEAR GENERATING PLANT
DOCKET 50-263
LICENSE No. DPR-22
EMERGENCY PLAN IMPLEMENTING PROCEDURES**

Furnished with this letter are revisions to the Monticello Nuclear Generating Plant Emergency Plan Implementing Procedures. The following procedures were revised:

<u>Procedure</u>	<u>Procedure Title</u>	<u>Revision</u>
A.2-209	Responsibilities of the Radiological Emergency Coordinator	14
A.2-806	Radiation Protection Support in the EOF	5

Please post changes in your copy of the Monticello Nuclear Generating Plant Emergency Plan Implementing Procedures. Superseded procedures should be destroyed.

These revisions do not reduce the effectiveness of the Monticello Nuclear Generating Plant Emergency Plan.

Please contact John Fields at 763-295-1663 if you require further information.

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Attachment 1: Responsibilities of the Radiological Emergency Coordinator - A.2-209 rev 14

Attachment 2: Radiation Protection Support in the EOF – A.2-806 Rev 5

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ATTACHMENT 1

**NUCLEAR MANAGEMENT COMPANY, LLC
MONTICELLO NUCLEAR GENERATING PLANT
DOCKET 50-263**

MAY 22, 2003

Responsibilities of the Radiological Emergency Coordinator – A.2-209 Rev 14

13 Pages Follow

MONTICELLO NUCLEAR GENERATING PLANT		A.2-209
TITLE:	RESPONSIBILITIES OF THE RADIOLOGICAL EMERGENCY COORDINATOR	Revision 14
		Page 1 of 13

EMERGENCY PLAN IMPLEMENTING PROCEDURE - TABLE OF CONTENTS

<u>SECTION</u>		<u>PAGE</u>
1.0	PURPOSE	2
2.0	APPLICABILITY	2
3.0	ORGANIZATION AND RESPONSIBILITIES	2
4.0	DISCUSSION	3
5.0	PRECAUTIONS	3
6.0	INSTRUCTIONS	3
6.1	Initial Actions	3
6.2	On-Site Habitability	4
6.3	Radiological Monitoring During Airborne Releases	5
6.4	Radiological Monitoring During Liquid Releases	6
6.5	Off-Site Dose Assessment (MIDAS)	6
6.6	Accident Assessment	7
6.7	Communications	7
6.8	Emergency Classification Changes	8
6.9	On-Site Protective Actions Recommendations	10
6.10	Off-Site Protective Action Recommendations	12
7.0	FIGURES	13

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MONTICELLO NUCLEAR GENERATING PLANT		A-2-209
TITLE:	RESPONSIBILITIES OF THE RADIOLOGICAL EMERGENCY COORDINATOR	Revision 14
		Page 2 of 13

1.0 PURPOSE

The purpose of this procedure is to provide general instructions and guidance to the Radiation Emergency Coordinator (REC) in order to ensure the activities of the Radiation Protection Group are performed in a thorough, consistent manner during an emergency.

2.0 APPLICABILITY

2.1 An emergency condition corresponding to an ALERT or higher emergency classification has been declared at the Monticello Nuclear Plant.

3.0 ORGANIZATION AND RESPONSIBILITIES

3.1 The REC is responsible for:

- 3.1.1 Implementation of this procedure.
- 3.1.2 Making on-site Protective Action Recommendations to the Emergency Director.
- 3.1.3 Making off-site Protective Action Recommendations (PARs) to State and/or County authorities (prior to turnover of this responsibility to the Radiation Protection Support Supervisor (RPSS)).
- 3.1.4 Overall direction of Radiation Protection and Chemistry Group activities.
- 3.1.5 Assist the ED in coordinating the transfer of off-site responsibilities to the EOF.

3.2 The REC Assistant is responsible for:

- 3.2.1 Assisting the REC in implementing this procedure.
- 3.2.2 Directing and coordinating Radiation Protection Group activities.

3.3 The Monitoring Section Leader (MSL) is responsible for:

- 3.3.1 Direction and control of Field Teams until turned over to the EOF.
- 3.3.2 Direction and control of on-site monitoring and habitability surveys.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-209
TITLE:	RESPONSIBILITIES OF THE RADIOLOGICAL EMERGENCY COORDINATOR	Revision 14
		Page 3 of 13

3.4 The Chemistry Section Leader (CSL) is responsible for:

3.4.1 Overall direction for sampling and analysis.

3.4.2 Overall coordination of Chemistry Group activities.

4.0 DISCUSSION

None

5.0 PRECAUTIONS

In the event of a Station Blackout (SBO), power is lost to the Area Radiation Monitors, the Standby Gas Treatment System, all ventilation systems and some Process Radiation Monitors. The Wide Range Gas Monitors will have power supplied to them, but, as there will be no process flow due to the loss of dilution fans, they should not be relied upon for accuracy.

6.0 INSTRUCTIONS

6.1 Initial Actions

6.1.1 Report to the Technical Support Center (TSC) and assume control of the Radiation Protection Group.

6.1.2 Initiate Form 5790-209-01 (REC CHECKLIST).

6.1.3 Determine the current status of the plant, the emergency conditions and radiological conditions within the plant.

6.1.4 If Stack, Reactor Building Vent, or Hard Pipe Vent release rates are above the alarm setpoint(s), consider placing the EFT and EVS systems in service. Direct the Support Group Leader to establish the EFT, and EVS boundaries in accordance with EPIP A.2-106 (ACTIVATION AND OPERATION OF THE TSC).

6.1.5 If applicable, obtain Area Radiation Monitor readings from the SPDS Terminal (or Control Room) to determine in-plant radiation levels.

6.1.6 Ensure access control is activated in accordance with EPIP A.2-107 (ACTIVATION AND OPERATION OF THE OSC) and A.2-108 (ACCESS CONTROL DURING EMERGENCIES).

6.1.7 If a local, plant or site evacuation is imminent, initiate the respective evacuation response in accordance with EPIP A.2-301 (EMERGENCY EVACUATION).

6.1.8 Ensure the appropriate on-site and off-site monitoring is initiated in accordance with section 6.2, 6.3 and 6.4.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-209
TITLE:	RESPONSIBILITIES OF THE RADIOLOGICAL EMERGENCY COORDINATOR	Revision 14
		Page 4 of 13

- 6.1.9 Ensure the off-site dose projection (MIDAS) is initiated in the TSC in accordance with A.2-406 (OFF-SITE DOSE PROJECTION).
- 6.1.10 Evaluate Radiation Protection Group staffing. When adequately staffed, and the EOF is activated, dispatch Radiation Protection personnel to the EOF as follows:
 - A. Dispatch a qualified REC to assume the duties of Radiation Protection Support Supervisor at the EOF if not staffed by Training Center personnel.
 - B. Dispatch a qualified Dose Assessment (MIDAS) operator to operate the MIDAS system at the EOF and report to the RPSS.
 - C. Dispatch a qualified EOF Count Room Chemistry technician to activate the EOF Count Room and report to the RPSS.
- 6.1.11 Initiate the REC Log in accordance with EPIP A.2-502 (RECORD KEEPING DURING AN EMERGENCY).

NOTE: Section 6.2 through 6.9 are activities for which the REC is responsible but may be delegated to the Assistant REC, MSL or CSL. These are continuing actions which implies the activity should be repeated regularly, as necessary, while the emergency condition exists.

6.2 On-Site Habitability

- 6.2.1 Direct habitability surveys for the TSC, OSC, Control Room, Access Control, Assembly Point, CAS, SAS, Security Officer (on access road) in accordance with A.2-201 (ON-SITE PROTECTIVE ACTION).
- 6.2.2 Make on-site protective action recommendations in accordance with A.2-201.
- 6.2.3 Direct the posting of response center habitability survey results on the Radiation Protection status board in the TSC. Ensure radiation protection personnel performing habitability surveys post the results on the status board(s) in the OSC.
- 6.2.4 Monitor effluent release paths. If effluent levels exceed the alarm setpoint(s) (alert levels in A.2.101 (CLASSIFICATION OF EMERGENCIES)), consider placing the EFT and EVS systems in service.

TITLE:

**RESPONSIBILITIES OF THE
RADIOLOGICAL EMERGENCY
COORDINATOR**

Revision 14

Page 5 of 13

- 6.2.5 If loose surface contamination levels in manned response centers within the Control Room Emergency Filtration Train and the Technical Support Center envelopes reach 1000 dpm/100cm², consider the establishment of strict contamination control measures for the EFT & EVS envelope as follows:
- A. Select the entrance doors (normally the west door by elevator for EVS boundary and the south door to the Control Room for EFT boundary);
 - B. Direct the Support Group Leader to close and post all EFT and EVS boundary doors (in accordance with EPIP A.2-106);
 - C. Direct the setup of a step-off pad and personnel frisking station at the designated entrance door;
 - D. Process contaminated personnel in accordance with current Radiation Protection Procedures (RPP);
 - E. Recommend manual activation of the Control Room EFT if conditions warrants (automatic activation occurs at radiation levels of 1 mrem/hr).
- 6.2.6 Continue periodic habitability surveys in manned response centers.

6.3 Radiological Monitoring During Airborne Releases

NOTE: The responsibility for off-site radiological monitoring may be transferred to the RPSS when the EOF is activated and adequately staffed. The Emergency Director and Emergency Manager should coordinate the transfer of this responsibility.

- 6.3.1 Direct on-site monitoring in accordance with procedures A.2-201 and A.2-402 (ON-SITE RADIOLOGICAL MONITORING).
- 6.3.2 Direct off-site monitoring in accordance with procedures A.2-202 (OFF-SITE MONITORING DURING AN EMERGENCY) and A.2-410 (OUT-OF-PLANT SURVEYS).
- 6.3.3 Approximate plume location and perform plume tracking on off-site Survey Map (notify the EOF if the plume is in the EOF sector);
- 6.3.4 Verify dose projections with monitoring team survey results.
- 6.3.5 Include applicable survey information on Follow-up Message form.
- 6.3.6 Record on-site and off-site survey results on appropriate survey results forms.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-209
TITLE:	RESPONSIBILITIES OF THE RADIOLOGICAL EMERGENCY COORDINATOR	Revision 14
		Page 6 of 13

6.3.7 The MSL should monitor in-plant repair teams, direct in-plant monitoring teams and on-site out-of-plant monitoring teams and assure the OSC is apprised of all up-coming activities.

6.3.8 After the responsibility for off-site radiological monitoring is transferred to the EOF, the Field Team Communicator in the TSC should continue to monitor communication between the EOF and off-site monitoring team and should coordinate all on-site out-of-plant monitoring as directed by the MSL.

6.4 Radiological Monitoring During Liquid Releases

6.4.1 Direct sampling of the river at the discharge canal sample station in accordance with EPIP A.2-203 (Radioactive Liquid Releases).

6.4.2 Include applicable sampling information on Follow-up Message form.

6.4.3 Record on-site and off-site sampling results on Form 5790-202-01 (OFF-SITE SURVEY RESULTS DATA SHEET).

6.5 Off-Site Dose Assessment (MIDAS)

NOTE: The responsibility for Off-site Dose Projections may be transferred to the RPSS when the EOF is activated and adequately staffed. The Emergency Director, Emergency Manager, REC, and RPSS should coordinate the transfer of this responsibility.

6.5.1 Project off-site doses and dose rates in accordance with A.2-406.

6.5.2 Incorporate forecast meteorological conditions into the dose projection process as applicable.

6.5.3 Evaluate the estimated duration of any release and incorporate the release duration into the dose projection process.

6.5.4 Determine the radioiodine component of the release and incorporate the proper I/NG ratio into the dose projection process as appropriate.

6.5.5 Include applicable dose projection information on the Follow-up Message form.

6.5.6 Post dose projection results on the Radiation Protection Status Board.

6.5.7 Once the MIDAS control has been transferred to the EOF, direct the MIDAS operator in the TSC to review all follow-up messages (faxed from the EOF) and ensure the Radiological Status Board is kept current.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-209
TITLE:	RESPONSIBILITIES OF THE RADIOLOGICAL EMERGENCY COORDINATOR	Revision 14
		Page 7 of 13

6.6 Accident Assessment

NOTE: The direction of process sampling, analysis and Core Damage Assessment may be delegated to the Chemistry Section Leader.

- 6.6.1 Review emergency classifications, specifically those which are radiological in nature, to ensure the classification is in accordance with A.2-101.
- 6.6.2 Direct the appropriate process sampling and analysis in accordance with A.2-408 (SAMPLE COORDINATION DURING EMERGENCIES).
- 6.6.3 Direct Core Damage Assessment to be performed in accordance with A.2-208 (CORE DAMAGE ASSESSMENT).
- 6.6.4 If a radioactive release has occurred, sample and analyze for the radioiodine component.

6.7 Communications

- 6.7.1 Complete periodic Follow-up Messages, Form 5790-102-03 (EMERGENCY NOTIFICATION FOLLOW-UP MESSAGE), and forward to the Emergency Director for approval;

NOTE: The minimum frequency of Follow-up Messages should be every 30 minutes or as specified by the State.

- 6.7.2 As necessary, complete Protective Action Recommendations, Form 5790-204-01 (MONTICELLO OFF-SITE PROTECTIVE ACTION RECOMMENDATION CHECKLIST) and forward to the Emergency Director for approval;
- 6.7.3 Provide frequent radiological status updates to:
 - A. Emergency Director and TSC staff as requested
 - B. RPC (in OSC)
 - C. On-site Assembly Point
 - D. Off-site Radiological Monitoring Team(s)
 - E. RPSS (EOF)
- 6.7.4 Respond to and man the Health Physics Network (HPN) phone as required.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-209
TITLE:	RESPONSIBILITIES OF THE RADIOLOGICAL EMERGENCY COORDINATOR	Revision 14
		Page 8 of 13

6.7.5 After the responsibility for off-site radiological monitoring is transferred to the EOF, the Field Team Communicator in the TSC should continue to monitor communication between the EOF and off-site monitoring team and should coordinate all on-site out-of-plant monitoring as directed by the MSL.

6.8 Emergency Classification Changes

NOTE: The responsibility for emergency classification change notifications may be transferred to the RPSS when the EOF is activated and adequately staffed.

6.8.1 When informed of a potential change in emergency classification, obtain a blank Form 5790-102-02 (MONTICELLO EMERGENCY NOTIFICATION REPORT FORM) and the applicable emergency guideline labels from an emergency communicator.

6.8.2 When the Emergency Director declares the new emergency classification, complete the form as follows:

- A. Check the applicable blanks indicating the new emergency classification.
- B. Record the time and date the Emergency Director declared the new emergency classification.
- C. Indicate whether the event involves a radioactive release.
- D. Identify the appropriate Off-Site Protection Action Recommendation. If the new emergency classification is a **GENERAL EMERGENCY**:
 1. Recommend evacuate all sectors out to 2 miles.
 2. Fill in the applicable Sectors (A-R) and downwind distances to which the PAR applies.
 3. Using the wind direction (from in degrees) and the **SECTOR/SUBAREA CONVERSION CHART** (on page 2 of the form), determine the geopolitical subarea(s) to which the PAR applies. Circle the affected subareas.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-209
TITLE:	RESPONSIBILITIES OF THE RADIOLOGICAL EMERGENCY COORDINATOR	Revision 14
		Page 9 of 13

- E. Identify the appropriate Emergency Action Level Guideline number and provide a brief description of why the emergency classification is changing. The labels provided in the following forms should be used to provide the description:
 - 1. 5790-102-08 (NUE GUIDELINE LABELS)
 - 2. 5790-103-05 (ALERT GUIDELINE LABELS)
 - 3. 5790-104-05 (SITE AREA EMERGENCY GUIDELINE LABELS)
 - 4. 5790-105-05 (GENERAL EMERGENCY GUIDELINE LABELS)

- F. Complete the meteorological section using current information (from MIDAS or most recent Emergency Notification Follow-up Message) including:
 - 1. Wind direction (from)
 - 2. Wind speed (mph)
 - 3. Temperature
 - 4. Precipitation
 - 5. Stability class (A-G)
 - 6. Affected Sectors (A-R)

- 6.8.3 Submit the completed form to the Emergency Director for review and approval signature. If off-site protective actions are being recommended, review the basis for the recommendations with the Emergency Director.

- 6.8.4 Ensure the completed, approved form is delivered immediately to the Lead Emergency Communicator for transmittal to off-site authorities (within 15 minutes of the emergency classification change) in accordance with A.2-501 (COMMUNICATIONS DURING AN EMERGENCY).

- 6.8.5 If off-site protective action recommendations are included on the form, initiate a call to the State Planning Chief (or State Duty Officer prior to EOC activation) at the State EOC to explain the basis for the recommendations.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-209
TITLE:	RESPONSIBILITIES OF THE RADIOLOGICAL EMERGENCY COORDINATOR	Revision 14
		Page 10 of 13

6.9 On-Site Protective Actions Recommendations

- 6.9.1 Make on-site protective action recommendations in accordance with A.2-201.
- 6.9.2 If dosimetry issuance is required in manned response centers (i.e., dose rates in manned response centers reach .5 mr/hr, or less at REC and/or ED discretion) make an announcement to that effect in the TSC. Direct dosimetry issuance to be conducted in the OSC, Control Room and Security Building.
- 6.9.3 When directed, coordinate evacuation activities as follows:
 - A. Assume control of entries to the affected area for exposure control purposes.

NOTE: When the hazardous conditions have cleared, allow normal access to the area or establish appropriate access control measures for restricted use.

CAUTION
<p>Prior to initiating an evacuation, it should be determined that evacuation is the protective action that will result in the lowest personnel exposure. Considerations are: 1) radiological conditions at the Assembly Point on-site and along evacuation routes and 2) whether these conditions can be mitigated prior to personnel receiving significant exposures.</p> <p>Plant or Site evacuations should be initiated either before or after the passage of a release, and evacuation routes should be chosen such that personnel travel away from the path of the plume.</p>

B. PLANT EVACUATION

- 1. Provide personnel (1 RPT minimum) for monitoring and assistance at the Assembly Point.
- 2. Assume control of access to the affected area(s) for exposure control purposes and implement procedures A.2-407 (PERSONNEL AND VEHICLE MONITORING AND DECONTAMINATION), A.2-201, and A.2-411 (ESTABLISHMENT OF A SECONDARY ACCESS CONTROL POINT).

MONTICELLO NUCLEAR GENERATING PLANT		A.2-209
TITLE:	RESPONSIBILITIES OF THE RADIOLOGICAL EMERGENCY COORDINATOR	Revision 14
		Page 11 of 13

3. If, and when directed, coordinate the evacuation of unnecessary personnel from the site. Contact the RPSS in the EOF (if staffed) for assistance with the following activities:
 - a. Assist in determining which personnel in the response centers (OSC, TSC, Assembly Point, etc.) are NOT required for emergency response activities. Personnel not required for emergency response should be released, subject to recall.
 - b. Determine whether the unnecessary personnel should be directed to an Off-site Assembly Point or sent home.
 - c. If an Off-Site Assembly Point is used, select an appropriate evacuation route for personnel leaving the site. Consider wind direction and other conditions such as radiological conditions (potential for release, release activity, etc.) in the route selection process.
 - d. Advise the EOF (if activated) of the selected route.
 - e. Inform the State and local authorities of the Off-site Assembly Point location, the evacuation route and the approximate time the evacuation will be initiated.
 - f. Determine if Personnel/Vehicle monitoring will be required at the Off-Site Assembly Point and if so, coordinate with the EOF to ensure Radiation Protection personnel are available to assist at the Off-Site Assembly Point.

C. SITE EVACUATION

1. Assist in selecting an Off-Site Assembly Point. Wind direction SHOULD be the primary consideration in the selection process although other conditions such as radiological conditions (potential for release, release activity, etc.) and potential Assembly Point habitability problems may be considered.
2. Assist in selecting an appropriate evacuation route for personnel leaving the site. Consider wind direction and other conditions such as radiological conditions (potential for release, release activity, etc.) in the route selection process.
3. Advise the EOF (if activated) of the selected route.
4. Inform the State and local authorities of the Off-Site Assembly Point location, the evacuation route and the approximate time the evacuation will be initiated.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-209
TITLE:	RESPONSIBILITIES OF THE RADIOLOGICAL EMERGENCY COORDINATOR	Revision 14
		Page 12 of 13

5. Determine if personnel/vehicle monitoring will be required at the Off-Site Assembly Point and if so, ensure Radiation Protection personnel are available to assist at the Off-Site Assembly Point.
6. Conduct personnel/vehicle radiological monitoring in accordance with EPIP A.2-407.
7. Assume control of access to the affected area(s) for exposure control purposes and implement procedures A.2-407, A.2-201 and A.2-411.

6.10 Off-Site Protective Action Recommendations

NOTE: The responsibility for Off-Site Protective Action Recommendations may be transferred to the RPSS when the EOF is activated and adequately staffed. The Emergency Director, Emergency Manager, REC and RPSS should coordinate the transfer of this responsibility.

- 6.10.1 Formulate off-site protective action recommendations in accordance with EPIP A.2-204 (OFF-SITE PROTECTIVE ACTION RECOMMENDATIONS).
- 6.10.2 As necessary, complete Form 5790-204-01 and forward to the Emergency Director for approval.
- 6.10.3 When issuing any off-site Protective Active Recommendation (PAR) to the State, initiate a telephone call to the State Planning Chief to explain the basis for the recommendation. The call should be initiated prior to or in conjunction with transmitting the PAR (via telecopy) to the State.

NOTE: Refer to the Monticello and Prairie Island Emergency Preparedness Telephone Directory for the State Planning Chief's telephone number.

- 6.10.4 Post Off-Site Protective Actions implemented on the Radiation Protection Status Board in the TSC.
- 6.10.5 Continue to monitor plant conditions for changing PAR condition, update the RPSS of changing conditions.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-209
TITLE:	RESPONSIBILITIES OF THE RADIOLOGICAL EMERGENCY COORDINATOR	Revision 14
		Page 13 of 13

7.0 FIGURES

None

ATTACHMENT 2

**NUCLEAR MANAGEMENT COMPANY, LLC
MONTICELLO NUCLEAR GENERATING PLANT
DOCKET 50-263**

MAY 22, 2003

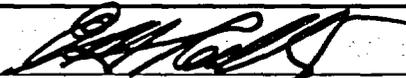
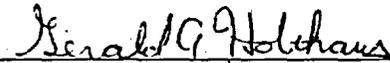
Radiation Protection Support in the EOF – A.2-806 Rev 5

18 Pages to Follow

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 1 of 18

EMERGENCY PLAN IMPLEMENTING PROCEDURE - TABLE OF CONTENTS

<u>SECTION</u>		<u>PAGE</u>
1.0	PURPOSE	2
2.0	APPLICABILITY	2
3.0	ORGANIZATION AND RESPONSIBILITIES	2
4.0	DISCUSSION	2
5.0	PRECAUTIONS	3
6.0	INSTRUCTIONS	3
6.1	Initial Activation and Staffing	3
6.2	Turnover of Off-site Dose Assessment From the TSC	7
6.3	RPSS Recordkeeping	8
6.4	Radiation Protection Support Group Shift Scheduling	8
6.5	EOF Status Updates	9
6.6	General Instructions	10
6.7	Radiological Assessment	11
6.8	Emergency Classification Changes	13
6.9	Plant/Site Evacuation Instructions	15
6.10	RPSS Shift Turnover	15
6.11	Event Termination or Recovery	16
7.0	FIGURES	18
7.1	Forms Utilized in Procedure	18

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MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 2 of 18

1.0 PURPOSE

This procedure provides instructions and guidance to the Radiation Protection Support Supervisor for the direction and coordination of EOF Radiation Protection Support Group activities.

Steps in this procedure satisfy commitment M90125A. Procedure steps satisfying this commitment are identified with a \$.

2.0 APPLICABILITY

2.1 An Alert has been declared at the Monticello plant and the EOF has been activated.

3.0 ORGANIZATION AND RESPONSIBILITIES

3.1 The Emergency Manager is responsible for:

3.1.1 Overall direction and coordination of the MNGP emergency response activities (after turnover from the Emergency Director).

3.2 The Radiation Protection Support Supervisor (RPSS) is responsible for:

3.2.1 Implementation of this procedure.

3.2.2 Overall direction and coordination of EOF RP Support Group activities including off-site dose projection and assessment, EOF Countroom operation, EOF radiological control and EOF personnel monitoring.

3.2.3 Making recommendations regarding off-site Protective Actions to the Emergency Manager and discussing the basis for off-site Protective Action Recommendations with the State Planning Chief.

3.2.4 The establishment of ERO shift schedules for the EOF Radiation Protection Support Group when requested by the EOF Coordinator.

3.3 The Assistant RPSS is responsible for:

3.3.1 Assisting the RPSS with the coordination of EOF Radiation Protection Support Group activities in accordance with this and other procedures.

4.0 DISCUSSION

This procedure provides instructions for the initial activation, staffing and continuing coordination of EOF Radiation Protection Group activities throughout the course of an emergency. When fully staffed, the primary responsibilities of the EOF Radiation Protection Support staff are to provide radiological advice and support to the Emergency Manager and serve as the primary interface with off-site (State and local governments) regarding off-site dose assessment and protective actions.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 3 of 18

In addition, the EOF Radiation Protection Support Group is responsible for monitoring and control in the EOF and, in certain cases, assisting the TSC Radiation Protection staff with the coordination of activities such as evacuation.

5.0 PRECAUTIONS

In the event of a Station Blackout (SBO), power is lost to the Area Radiation Monitors, the Standby Gas Treatment System, all ventilation systems and some Process Radiation Monitors. The Wide Range Gas Monitors will have power supplied to them, but, as there will be no process flow due to the loss of dilution fans, they should not be relied upon for accuracy.

6.0 INSTRUCTIONS

6.1 Initial Activation and Staffing

- 6.1.1 Upon notification of an Alert (or higher) emergency classification, RPSS qualified individuals should report directly to the EOF and coordinate the staffing of the RPSS position with the Radiological Emergency Coordinator (REC).
- 6.1.2 Upon arrival in the EOF, refer to the EOF Tag Board and determine the initial RPSS assignment as follows:
 - A. If no one has assumed the RPSS position, turn the RPSS tag and sign in as RPSS.
 - B. If the RPSS position is already staffed, refer to other EOF positions (for which you're qualified) to determine staffing need in those areas. If unfilled positions exist, turn the applicable tag and assume that position. If not, report directly to the RPSS.
- 6.1.3 Contact the REC in the TSC and coordinate the staffing of the RPSS position with the REC.

NOTE: The Rad Prot Sup Supv position may be staffed by Training Center or plant personnel that are REC qualified. The staffing of the REC and RPSS positions should be coordinated to optimize available personnel resources (i.e., experience and qualification) and pace qualified resources based on the estimated duration of the event.

- 6.1.4 Assume the duties of RPSS and initiate Form 5790-806-01 (RPSS ACTIVATION CHECKLIST).
- 6.1.5 Obtain the RPSS Log Book, ballcap, and necessary administrative supplies from the EOF storage cabinet and setup residence at the Rad Prot Sup Supv area in the EOF Command Center.
- 6.1.6 Initiate the RPSS Log Book and maintain the log and record significant information in accordance with section 6.3.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 4 of 18

- 6.1.7 Assess Radiation Protection Group staffing and augment as necessary by contacting additional group personnel by telephone. Request the assistance of EOF Support Group personnel (if present).

NOTE: Form 5790-001-01 (EMERGENCY RESPONSE ORGANIZATION) contains the list of qualified EOF Radiation Protection Support Group personnel. The Monticello and Prairie Island Nuclear EP Telephone Directory contains home/pager telephone numbers for all ERO personnel.

- 6.1.8 As Radiation Protection Group personnel report, verify their fitness-for-duty through questioning and/or during initial EOF Command Center status announcements (conducted by the EOF Coordinator).

NOTE: The fitness-for-duty of individuals should be assessed prior to their engaging in safety-related emergency response activities. The assessment should include, at a minimum, a determination of whether individuals have consumed alcohol within the last 5 hours.

- 6.1.9 Monitor Radiation Protection Group staffing and, as personnel become available, assign individuals to perform the following activities:

NOTE: During initial EOF activation Radiation Protection Group assignments are established by use of the EOF ERO Tagboard; however, the RPSS should monitor initial staffing and coordinate as necessary.

- A. Ensure an Assistant RPSS is assigned to assist with RPSS duties including the coordination of EOF personnel monitoring and habitability surveys in accordance with A.2-808 (RADIOLOGICAL MONITORING AND CONTROL AT THE EOF).
- B. Ensure the EOF Radiation Protection Tech (RPT) position is filled (from the plant or PI) to conduct EOF habitability surveys and general radiation protection duties in the EOF. Contact the REC to coordinate staffing the EOF RPT position.
- C. Ensure the MIDAS Operator position is staffed (by a plant Chemistry Tech (CT) and prepared to conduct off-site dose projections in accordance with A.2-406 (OFF-SITE DOSE PROJECTION).
- D. Assign a Radiation Protection Status Board Keeper (from the EOF Support Group or Radiation Protection Group) to maintain the EOF Radiation Protection Status Board. Coordinate staffing with the EOF Coordinator, if necessary.
- E. Ensure the EOF Countroom Tech position is staffed (by a plant CT) and activates the EOF Countroom in accordance with A.2-424 (EOF COUNT ROOM PROCEDURES).

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 5 of 18

- F. Assign a Health Physics Network (HPN) Communicator to man the FTS-HPN when requested by the NRC and provide radiological information and data to the NRC in accordance with A.2-803 (EMERGENCY COMMUNICATIONS AT THE EOF). Prior to continuous manning of the HPN the communicator may be assigned to assist with other Radiation Protection activities as necessary. Coordinate staffing with the EOF Coordinator, if necessary.
 - G. Ensure the Field Team Coordinator position is staffed (from the EOF Support Group or Radiation Protection Group) to direct off-site monitoring activities in accordance with A.2-807 (OFF-SITE DOSE ASSESSMENT AND PROTECTIVE ACTION RECOMMENDATIONS).
 - H. Ensure the Field Team Communicator position is staffed (from the EOF Support Group or Radiation Protection Group) to coordinate off-site monitoring activities (via radio) as directed by the Field Team Coordinator in accordance with A.2-807.
 - I. Ensure two plant personnel are provided (by the OSC) to function as Field Team Drivers for the Prairie Island Field Teams (when they arrive). These positions should be staffed prior to PI F/T arrival (approximately 3 hours after declaration of an Alert). Coordinate staffing with the OSC Coordinator, if necessary.
 - J. Ensure one (or two) plant personnel are provided (by the OSC) to function as Sample Couriers for the Field Teams in accordance with A.2-410 (OUT-OF-PLANT SURVEYS). This position should be staffed anytime Field Teams are conducting off-site monitoring activities and samples may be returned to the EOF Countroom for analysis.
- 6.1.10 If necessary, contact the REC to coordinate the staffing of the EOF RPT, EOF Countroom CT, and MIDAS Operator positions.
 - 6.1.11 When all Radiation Protection Group positions are filled, inform the Emergency Manager and the EOF Coordinator that Radiation Protection Group staffing is complete.
 - 6.1.12 Contact the REC or Assistant REC to determine plant conditions, the extent of radiological surveys completed, off-site dose estimates, and any off-site protective actions recommended or implemented.
 - 6.1.13 Obtain any Emergency Notification Report Form(s) and/or Emergency Notification Followup Messages (transmitted by the TSC) from the EOF fax and direct the Radiation Protection Status Board Keeper to begin updating the Radiation Protection Status board with information from the forms and/or SPDS.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 6 of 18

- 6.1.14 Direct the Field Team Coordinator (and Communicator) to establish radio contact with the Monticello Field Teams and begin monitoring Field Team activities (as directed by the TSC). The Survey Point Map and Off-site Survey Results Board should be updated with information obtained by monitoring radio communications.
- 6.1.15 Direct the EOF Countroom Tech to activate the EOF Countroom and prepare for analysis of samples in accordance with A.2-424.
- 6.1.16 Perform an initial assessment to determine if radiological monitoring and controls should be immediately established in the EOF by reviewing the current Stack and Vent release rates on SPDS (or contacting the REC). If releases in excess of the Alert levels (specified in A.2-101 (CLASSIFICATION OF EMERGENCIES), Guideline 1 for Stack and Vent effluents) has occurred or is occurring (or is imminent based on deteriorating plant conditions):
 - A. Recommend the EOF Coordinator shift the EOF ventilation system to the emergency mode.
 - B. Direct the EOF RPT to obtain periodic air samples.
 - C. Direct the EOF RPT to position and activate the EOF Dosimeter Area Radiation Monitor (DARM) in the EOF Command Center in accordance with A.2 808.
- 6.1.17 If radiological releases have occurred (or are occurring) or if contaminated personnel or samples will be arriving at the EOF, advise the EOF Coordinator to establish access to the EOF at the Receiving Area entrance. Direct the EOF RPT to assist with setup of the Receiving Area in accordance with A.2-808.
- 6.1.18 Direct the EOF MIDAS Operator to establish contact with the TSC MIDAS Operator and begin monitoring dose projection activities (conducted by the TSC) including obtaining Emergency Notification Followup Messages transmitted (faxed) to the EOF.
- 6.1.19 When directed by the Emergency Manager, coordinate the transfer of responsibility for off-site dose assessment (MIDAS, Field Team direction and off-site communications) with the REC (and EOF Coordinator) in accordance with section 6.2.
- 6.1.20 Determine the status of the Prairie Island Field Team response to the Monticello EOF by contacting the PI Shift Supervisor (or Control Room).

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 7 of 18

6.1.21 Evaluate available data and information relative to the event to determine the actual and potential implications of the event (from a radiation protection perspective) in accordance with the applicable sections of this procedure, A.2-807 and A.2-808.

6.1.22 Complete Form 5790-806-01 and file in the container provided for emergency records.

6.2 Turnover of Off-site Dose Assessment From the TSC

6.2.1 When the EOF is fully staffed and operational, assist in coordinating the transfer of off-site responsibilities (from the TSC) to the EOF as follows:

- A. Verify the Field Team Communicator position is manned and an operational check of the EOF radio console is complete.
- B. Verify the MIDAS Operator position is manned and the MIDAS terminal is operable.
- C. Ensure a sufficient supply of controlled forms (used for off-site notifications and PARs) are available.
- D. Check the status (timing) of Emergency Followup Message transmissions with the REC.

6.2.2 Inform the EOF Coordinator and Emergency Manager when prepared to assume responsibility for MIDAS and the control of the Field Teams.

6.2.3 When directed by the Emergency Manager, assume the responsibility for MIDAS and the Field Teams. Ensure the MIDAS Operator and Field Team Communicator is aware of the transfer and coordinate with their respective counterparts in the TSC.

6.2.4 Direct the Field Team Communicator to inform all Field Teams of the transfer of responsibility and direct off-site monitoring activities in accordance with A.2-807.

6.2.5 Direct the MIDAS Operator to perform off-site dose projections (in accordance with A.2-406 and generate Form 5790-102-03 (EMERGENCY NOTIFICATION FOLLOWUP MESSAGE).

6.2.6 Inform the Emergency Manager and EOF Coordinator when the transfer of MIDAS and control of the Field Teams is complete.

6.2.7 Notify the State Planning Chief in the State EOC of the transfer of off-site responsibilities.

6.2.8 Note the time of the transfer in the RPSS Log Book.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 8 of 18

6.2.9 Initiate and complete the associated forms for emergency classification changes, followup messages and off-site protective action recommendations in accordance with Section 6.8 of this procedure and A.2-807.

6.3 RPSS Recordkeeping

6.3.1 Upon activation initiate the RPSS Log Book.

6.3.2 Record data, trends, and other information of radiological significance in the log in accordance with the following guidance:

- A. Significant events and the time(s) which they occur including changes in plant conditions, radiological releases, and trends.
- B. Failures of plant systems, components or equipment crucial to achieving accident mitigation objectives and the time(s) those failures occur.
- C. Summarize the results of radiological evaluations, dose projections, PARs and/or recommendations made to the Emergency Manager or REC.
- D. Record key operational decisions and strategies developed (or implemented).
- E. Log contacts with off-site agencies (e.g., State Planning and Assessment Center, etc.) technical vendors or contractors and consultants (e.g., contract health physics services) whose services have been requested including status reports of their response to the site.

6.3.3 Periodically monitor the distribution of completed forms in the Radiation Protection area (of the EOF) to ensure accurate, consistent, approved information is used by Radiation Protection personnel.

6.3.4 Ensure all completed forms are filed in the appropriate container provided and retained as emergency records.

6.4 Radiation Protection Support Group Shift Scheduling

6.4.1 If the duration of the event could exceed 12 hours, evaluate Radiation Protection Group staffing required to support 24-hour coverage.

6.4.2 If and when requested by the EOF Coordinator, coordinate the assignment of ERO shifts for the group by completing Form 5790-802-05 (ERO SHIFT SCHEDULE - EOF SUPPORT GROUP) and forwarding the completed schedule to the EOF Coordinator.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 9 of 18

6.4.3 If 24-hour coverage is required, coordinate the departure of "next shift" Technical Support Group personnel as follows:

- A. Ensure ERO personnel are informed of their next ERO shift in accordance with the ERO Shift Schedule.
- B. Ensure personnel are instructed to contact the EOF if their final destination, after departing the site, is a location other than their permanent residence. In this case, they should provide a telephone number at which they can be reached if needed sooner than their next scheduled shift.
- C. Ensure ERO personnel are instructed to carry their company ID card to gain access to the site (in the event road blocks are established by off-site authorities).

6.4.4 Next shift ERO personnel should depart the EOF as follows depending on the situation:

- A. If no releases (above ODCM limits) are occurring and no off-site protective actions are in effect, personnel may depart the EOF and site as normal.
- B. If significant releases are occurring and/or off-site protective actions are in effect, coordinate the departure of next shift ERO personnel with the local county authorities (Sheriff Dispatcher or County EOC). The departure route should take personnel upwind of any releases.

6.5 EOF Status Updates

6.5.1 When notified of an EOF status update, use Form 5790-806-02 (RPSS STATUS UPDATE CHECKLIST) to prepare for radiation protection portion of the update. Record the date and time of the status update in the spaces provided on the form.

6.5.2 During EOF updates, the RPSS should provide a status of the following topics using Form 5790-806-02 as a guide:

- A. Review the current radioactive release rates, release paths, recent trends in release rates, estimated release duration, source term, and the potential for changes in the magnitude of the source term.
- B. Review the potential for emergency classification changes (escalations) based on radiological conditions.
- \$ C. Review the most recent off-site dose projection results (Followup Message) including projected doses and dose rates and the results of any dose projection model comparisons with the State and/or NRC.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 10 of 18

- D. Review the most recent off-site survey results from Radiation Protection Status Board, Followup Message, or Survey Results board and any comparative survey results from the State Field Teams, EPA or DOE.
- E. Review the current and forecast meteorology including wind speed, direction precipitation and the potential for change.
- F. Review the status of off-site protective actions recommended to or implemented by the State (or Counties).
- G. Review current EOF habitability conditions including dose rates, DAC ratios, ARM readings and the potential for protective actions in the EOF (e.g., PC use, evacuation, etc.).
- H. Review personnel status including overexposures and/or personnel contaminations.
- I. Review current Radiation Protection Group staffing and potential staffing needs including the status of ERO shift scheduling (if applicable).

- \$ 6.5.3 If the NRC is present (in the EOF), your NRC counterpart should provide input immediately after the RPSS portion of the status update.
- 6.5.4 On Form 5790-806-02, note significant items reviewed during the TSS, EOF Coordinator and EM portion of the status update.
- 6.5.5 Upon completion of the status update, note the time of the next status update (if established by the EM).

6.6 General Instructions

- 6.6.1 Continuously assess radiological conditions and provide advice to the Emergency Manager (and other EOF Group Leaders).
- 6.6.2 Continuously maintain the RPSS Log and enter significant events/decisions as they occur throughout the event.
- 6.6.3 Ensure the Dose Assessment Room is continuously staffed and the Survey Point Map and Off-site Survey Results board are maintained current.
- 6.6.4 Ensure the EOF Countroom is continuously staffed and off-site sample analysis results are delivered to the RPSS (or Assistant RPSS) for review.
- 6.6.5 Ensure the Radiation Protection Status Board in the EOF is continuously updated throughout the event with information obtained from approved Emergency Notification Follow-up Messages, the SPDS terminal and the Field Team Survey Results Board.

- 6.6.6 If, and when requested by the EOF Coordinator, establish a 24 hour shift schedule for the EOF Radiation Protection Support Group by completing Form 5790-802-03 (ERO SHIFT SCHEDULE - EOF RADIATION PROTECTION SUPPORT GROUP) in accordance with Section 6.4.
- 6.6.7 Throughout the event, maintain a communication link (via hotline or commercial telephone) with the State Planning Chief at the State EOC.
- 6.6.8 Coordinate the manning of the Health Physics Network (HPN) link with the TSC. Ensure the FTS-HPN is continuously manned (as requested by the NRC) in accordance with the applicable section of A.2-803).
- 6.6.9 Through contact with the State Planning Chief, evaluate the need for additional Prairie Island Radiation Protection personnel assistance at the Public Reception Center (Osseo Jr. High School).
- 6.6.10 If the plant is conducting a Plant (or Site) evacuation, coordinate the removal of non-essential personnel from the site and provide radiation protection assistance (for off-site personnel and vehicle monitoring and decon) as requested by the REC in accordance with Section 6.9
- 6.6.11 Serve as the "point-of-contact" with off-site Health Physics vendor and contract technical services requested by the EOF or TSC. Request off-site vendor/technical services in accordance with the instructions in A.2-804 (EOF SUPPORT AND LOGISTICS).
- 6.6.12 Interface with NRC technical analysts (e.g., Protective Measures Coordinator, Environmental Dose Assessment Coordinator, etc.) present in the EOF (or by telephone if the NRC site incident response team is not present).
- 6.6.13 Continuously re-evaluate priorities for the Radiation Protection Support Group and redirect the group's efforts as necessary.
- 6.6.14 When the immediate emergency has been mitigated and the Emergency Manager is considering termination or making the transition to Recovery, initiate Section 6.11.

6.7 Radiological Assessment

NOTE: This section provides instructions for the conduct of radiological assessment activities for which the RPSS (EOF Radiation Protection Group) is responsible. These assessment activities should be conducted by the RPSS throughout the event as necessary.

- 6.7.1 If radiological conditions in the EOF are a concern continuously assess EOF habitability through the conduct of periodic habitability surveys and operation of the DARM in accordance with A.2-808.
- 6.7.2 Ensure proper dosimetry is issued, collected and recorded for all EOF ERO personnel in accordance with A.2-808 and A.2-809 (EOF SECURITY).

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 12 of 18

- 6.7.3 Throughout the event, evaluate the need to activate (or continue operation) of the EOF ventilation system in the emergency mode (i.e., release rates above the Alert EAL level). The EOF Coordinator is responsible for operation of the EOF Ventilation System in accordance with A.2-802 (ACTIVATION AND OPERATION OF THE EOF).
- 6.7.4 Evaluate the need to relocate the EOF access point to the Receiving Area entrance (i.e., if releases have or are occurring or if contaminated samples/personnel will be received). The EOF Coordinator, EOF Security, and EOF Countroom Tech are responsible for relocating the access point and setup of the Receiving Area.
- 6.7.5 If radiological conditions in the EOF warrant, make protective action recommendations (for EOF personnel) to the Emergency Manager in accordance with the criteria in A.2-808.
- 6.7.6 If necessary, consider emergency exposure authorizations for EOF personnel (if expected to exceed MNGP Administrative or Federal exposure limits). If emergency exposures are required, implement A.2-401 (EMERGENCY EXPOSURE CONTROL).
- 6.7.7 If contaminated personnel are received in the EOF (Receiving Area), implement personnel monitoring and decontamination in accordance with A.2-407 (PERSONNEL AND VEHICLE MONITORING AND DECONTAMINATION).
- 6.7.8 If off-site releases are occurring, project off-site doses using MIDAS (or backup method) throughout the event in accordance with A.2-406.
- 6.7.9 Coordinate off-site monitoring activities (Field Teams) via radio and ensure Field Team survey/sample results are posted on the Survey Results and Radiation Protection Status Boards in the EOF in accordance with A.2-807.
- 6.7.10 Ensure off-site survey results are compared to MIDAS dose projections (for the same period) and that MIDAS and survey results are shared with the State Planning Chief in the State EOC in accordance with A.2-807.
- 6.7.11 As necessary, review off-site sample analysis results from the EOF Countroom.
- 6.7.12 Periodically (about every 30 minutes) update the State Planning Chief by transmitting Form 5790-102-03 and reviewing the message contents with the State Health Department in accordance with A.2-807.
- 6.7.13 Based on dose projections, off-site surveys, or the emergency classification (General Emergency) recommend off-site protective actions to the State (or counties if the State EOC is not activated) in accordance with A.2-807.

**TITLE: RADIATION PROTECTION SUPPORT IN
THE EOF**

Revision 5

Page 13 of 18

- 6.7.14 If off-site protective actions are recommended, monitor the progress of implementation (by the State and counties) through discussions with the State Planning Chief in the State EOC. Ensure the recommended and implemented PARs are posted on the Radiation Protection Status Board in the EOF.
- 6.7.15 If off-site protective actions are recommended (or are imminent), evaluate the need to recommend protective actions for the Sherco Plant to the corporate management at the JPIC in accordance with A.2-807.
- 6.7.16 If the event involves a radiological release to the environment, notify the Site Radiological Services Group. Contract REMP Labs will provide resources for environmental sampling and analysis.

6.8 Emergency Classification Changes

- 6.8.1 When informed of a potential change in emergency classification, obtain a blank Form 5790-102-02 (MONTICELLO EMERGENCY NOTIFICATION REPORT FORM).

NOTE: Complete as much of the form as possible with current information prior to the actual declaration of the new emergency classification.

- 6.8.2 When the Emergency Manager declares the new emergency classification, complete the form as follows:
- A. Check the applicable blanks indicating the new emergency classification.
 - B. Record the time and date the Emergency Manager declared the new emergency classification.
 - C. Indicate whether the event involves a radioactive release.
 - D. Identify the appropriate Off-Site Protection Action Recommendation. If the new emergency classification is a **GENERAL EMERGENCY:**
 1. Recommend evacuate all sectors out to 2 miles.
 2. Fill in the applicable Sectors (A-R) and downwind distances to which the PAR applies.
 3. Using the wind direction (from in degrees) and the **SECTOR/SUBAREA CONVERSION CHART** (on page 2 of the form), determine the geopolitical subarea(s) to which the PAR applies. Circle the affected subareas.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 14 of 18

E. Identify the appropriate Emergency Action Level Guideline number and provide a brief description of why the emergency classification is changing. The labels provided in the following forms should be used to provide the description:

1. 5790-102-08 (NUE GUIDELINE LABELS)
2. 5790-103-05 (ALERT GUIDELINE LABELS)
3. 5790-104-04 (EMERGENCY CALL LIST-ALERT/SITE AREA/GENERAL)
4. 5790-105-05 (GENERAL EMERGENCY GUIDELINE LABELS)

F. Complete the meteorological section using current information (from MIDAS or most recent Emergency Notification Follow-up Message) including:

1. Wind direction (from)
2. Wind speed (mph)
3. Temperature
4. Precipitation
5. Stability class (A-G)
6. Affected Sectors (A-R)

6.8.3. Submit the completed form to the Emergency Manager for review and approval signature. If Off-Site Protective Actions are being recommended, review the basis for the recommendations with the Emergency Manager.

6.8.4. Ensure the completed approved form is delivered immediately to the Off-Site Communicator(s) for transmittal to off-site authorities (within 15 minutes of the emergency classification change) in accordance with Form 5790-803-01 (EOF RECLASSIFICATION IN CALL-LIST).

6.8.5. If Off-Site Protective Action recommendations are included on the form, initiate a call to the State Planning Chief (or State Duty Officer prior to EOC activation) at the State EOC to explain the basis for the recommendations.

6.9 Plant/Site Evacuation Instructions

- 6.9.1 If an evacuation of the EOF is required, refer to A.2-810 (TRANSFER TO THE BACKUP EOF).
- 6.9.2 If a Plant (or Site) evacuation is conducted, assist the REC with coordinating the following aspects of the evacuation:
- A. Selection of the evacuation route from the site upwind of any releases (if possible).
 - B. Notification of the counties (Sheriff's Dispatchers or EOCs) to assist with the evacuation (e.g., traffic control, road block passage, etc.).
 - C. Selection of the Off-site Assembly Point (if used).
 - D. Providing resources (Field Teams) for evacuee and vehicle monitoring and decontamination in accordance with A.2-407.
- 6.9.3 Coordinate the conduct of personnel monitoring and decontamination if evacuees are sent to the EOF (as an Off-site Assembly Point).
- 6.9.4 Provide periodic updates to the Emergency Manager on the progress of the evacuation and personnel monitoring results (i.e., number of contaminated evacuees, etc.).
- 6.9.5 Provide periodic updates to the counties on the status of the evacuation.

6.10 RPSS Shift Turnover

- 6.10.1 Upon arrival at the EOF, the on-coming RPSS should review the:
- A. Chronological Events Flipchart to become familiar with key events that have occurred.
 - B. The RPSS Log book entries (for the previous 12 hours if applicable).
- § 6.10.2 Review the following information with the existing RPSS. If the NRC is present, include the RPSS counterpart (Protective Measures Coordinator) in the turnover review if possible:
- A. Review the status of current Radiation Protection Support Group staffing and future staffing needs.
 - B. Review the current plant status including the extent of radioactive releases, reactor status and other radiological issues related to the event (e.g., core damage estimates, etc.).

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 16 of 18

- C. The status of EOP implementation (if applicable) and other operational information related to the event (i.e., releases, containment venting, etc.).
- D. The status of any off-site dose projections in progress (or completed).
- E. Off-site PARs recommended and/or implemented.
- F. The status of any Health Physics vendor/contractor support requested.
- \$ G. The status of radiation protection communications links (HPN, Field Teams, etc.) and off-site agency interface (e.g., State Planning and Assessment Center, NRC incident response, etc.).

6.10.3 If the Emergency Manager is conducting a turnover briefing, attend the EM briefing as requested.

6.10.4 The on-coming RPSS should contact the REC (in the TSC) to review the current status and determine any assistance the EOF Radiation Protection Support Group can provide.

6.10.5 Upon completion of the turnover discussions, the on-coming RPSS should formally assume the duty and note the turnover in the RPSS Log Book.

6.10.6 Inform the Emergency Manager the RPSS turnover is complete.

6.10.7 Make an announcement in the EOF Command Center regarding the turnover of RPSS responsibilities.

6.11 Event Termination or Recovery

6.11.1 Evaluate radiological releases and plant conditions throughout the event. When the conditions listed in A.2-811 (EVENT TERMINATION OR RECOVERY IN THE EOF) are met, advise the Emergency Manager that the event may be terminated or the transition to Recovery made (based on off-site releases and/or other radiological conditions).

6.11.2 When the conditions for event termination or Recovery are met, consult (or participate in consultation) with the State Planning Chief to determine if event termination (or Recovery) are feasible based on off-site conditions and/or protective actions still in place.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 17 of 18

\$ 6.11.3 When the EM, ED, NRC and State concur on event termination (or Recovery), initiate Form 5790-102-02 for the emergency classification change in accordance with section 6.8 and:

- A. Submit the completed form for Emergency Manager review and approval.
- B. Ensure the form is transmitted to the off-site authorities (by Off-site Communicators) in accordance with Form 5790-803-01.

6.11.4 When directed by the Emergency Manager, compile a list of radiation protection issues which require action or evaluation to return the site and environs to their pre-accident condition as follows:

- A. Use Form 5790-602-01 (RECOVERY ACTION ITEM FORM) to compile the list of radiation protection related items (e.g., facility decontamination, contract HP support for outages, etc.).
- B. Refer to A.2-811, Section 6.2, to identify items to consider when compiling the Radiation Protection Recovery Action Item list.
- C. Coordinate the development of the Recovery Action Item list with the Radiological Emergency Coordinator (in the TSC).
- D. On the Recovery Action Item list include a description of the action required (for each item).

6.11.5 Submit the completed Recovery Action Item list to the Technical Support Supervisor for inclusion in the master Recovery Action List(s) and the Emergency Manager turnover to the Recovery Manager.

6.11.6 Participate in the transition to recovery and turnover discussions as requested by the Emergency Manager.

MONTICELLO NUCLEAR GENERATING PLANT		A.2-806
TITLE:	RADIATION PROTECTION SUPPORT IN THE EOF	Revision 5
		Page 18 of 18

7.0 FIGURES

FIGURE

7.1 Forms Utilized in Procedure

<u>Procedure Number</u>	<u>Title</u>
1. 5790-806-01	RPSS ACTIVATION CHECKLIST
2. 5790-102-03	EMERGENCY NOTIFICATION FOLLOWUP MESSAGE
3. 5790-802-05	ERO SHIFT SCHEDULE - EOF SUPPORT GROUP
4. 5790-802-03	ERO SHIFT SCHEDULE - EOF RADIATION PROTECTION SUPPORT GROUP
5. 5790-806-02	RPSS STATUS UPDATE CHECKLIST
6. 5790-102-02	MONTICELLO EMERGENCY NOTIFICATION REPORT FORM
7. 5790-102-08	NUE GUIDELINE LABELS
8. 5790-103-05	ALERT GUIDELINE LABELS
9. 5790-104-04	EMERGENCY CALL LIST-ALERT/SITE AREA/GENERAL
10. 5790-105-05	GENERAL EMERGENCY GUIDELINE LABELS
11. 5790-803-01	EOF RECLASSIFICATION CALL-LIST
12. 5790-602-01	RECOVERY ACTION ITEM FORM