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April 14, 2003
LIC-03-0058

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

Reference: Docket No. 50-285

SUBJECT: Transmittal of Changes to Emergency Plan Implementing Procedures (EPIP) and to Radiological Emergency Response Plan (RERP)

In accordance with 10 CFR 50.54(q), 10 CFR 50, Appendix E, Section V, and 10 CFR 50.4(b)(5), please find EPF change packages enclosed for the Document Control Desk (holder of Copy 165) and the NRC Region IV Plant Support Branch Secretary (holder of Copies 154 and 155).

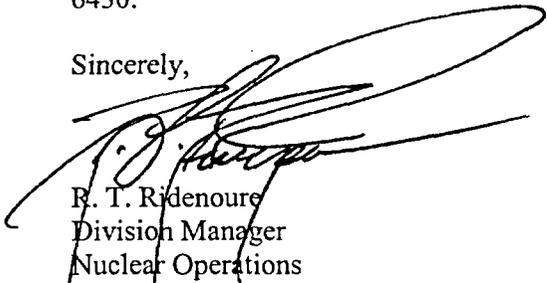
The document update instructions and summary of changes are included on the Confirmation of Transmittal form (Form EP-1) attached to each controlled copy change package. Please return the Confirmation of Transmittal forms by May 30, 2003.

The revised documents included in the enclosed package are:

EPIP Index issued 04/03/03
EPIP-EOF R19 issued 04/03/03
RERP Index issued 04/03/03
RERP Section K R10 issued 04/03/03

If you have any questions regarding the enclosed changes, please contact Mr. Carl Simmons at (402) 533-6430.

Sincerely,



R. T. Ridenoure
Division Manager
Nuclear Operations

RTR/men

Enclosures

c: NRC Region IV Plant Support Branch Secretary (2 sets)
Alan Wang, NRC Project Manager (w/o enclosures)
J. G. Kramer, NRC Senior Resident Inspector (w/o enclosures)
Winston & Strawn (w/o enclosures)
Emergency Planning Department (w/o enclosures)

A 045

OMAHA PUBLIC POWER DISTRICT

Confirmation of Transmittal for
Emergency Planning Documents/Information

Radiological Emergency
Response Plan (RERP)

Emergency Plan
Implementing Procedures
(EPIP)

Emergency Planning
Forms (EPF)

Emergency Planning Department Manual
(EPDM)

Other Emergency Planning Document(s)/
Information

Transmitted to:

Name: Document Control Desk Copy No: 165
Division of Reactor Safety Copy No: 154
Attn: Senior Emergency Preparedness Inspector
Division of Reactor Safety Copy No: 155
Attn: Senior Emergency Preparedness Inspector

Date: _____

The following document(s) / information are forwarded for your manual:

REMOVE SECTION

EPIP Index page 1 of 3 issued 01/23/03
EPIP-EOF-11 R18 issued 09/18/97
RERP Index page 1 of 2 issued 03/25/03
RERP Section K R9 issued 02/03/00

INSERT SECTION

EPIP Index page 1 of 3 issued 04/03/03
EPIP-EOF-R19 issued 04/03/03
RERP Index page 1 of 2 issued 04/03/03
RERP Section K R10 issued 04/03/03

Summary of Changes:

EPIP-EOF-11 was revised per the writers guide and to clarify how emergency worker extensions are made. RERP Section K was revised to approve the emergency worker extensions being changed to allow each facility director to authorize extensions up to 5 Rem. This is being done to clarify and enhance how OPPD tracks this exposure. It is also to clarify that the Command and Control Position must authorize once in a lifetime exposures per the guidance of EPA-400-R-92-001.

[Signature]
Supervisor - Emergency Planning

I hereby acknowledge receipt of the above documents/information and have included them in my assigned manuals.

Signature: _____

Date: _____

Please sign above and return by 05/30/03 to:

Beth Nagel
Fort Calhoun Station, FC-2-1
Omaha Public Power District
444 South 16th Street Mall
Omaha, NE 68102-2247

NOTE: If the document(s)/information contained in this transmittal is no longer requested or needed by the recipient, or has been transferred to another individuals, please fill out the information below.

Document(s)/Information No Longer Requested/Needed

Document(s)/Information Transferred to:

Name: _____

Mailing Address: _____

Document	Document Title	Revision/Date
EPIP-OSC-1	Emergency Classification	R35 05-02-02
EPIP-OSC-2	Command and Control Position Actions/Notifications	R41 01-16-03a
EPIP-OSC-9	Emergency Team Briefings	R7 12-09-99
EPIP-OSC-15	Communicator Actions	R22 10-24-00
EPIP-OSC-21	Activation of the Operations Support Center	R12 10-29-02
EPIP-TSC-1	Activation of the Technical Support Center	R23 10-29-02
EPIP-TSC-2	Catastrophic Flooding Preparations (R0 03-22-95) DELETED (05-09-95) REINSTATED	R3 01-23-03
EPIP-TSC-8	Core Damage Assessment	R14 01-19-01
EPIP-EOF-1	Activation of the Emergency Operations Facility	R13 10-29-02
EPIP-EOF-3	Offsite Monitoring	R18 11-12-02
EPIP-EOF-6	Dose Assessment	R32 01-23-02
EPIP-EOF-7	Protective Action Guidelines	R13 10-31-00b
EPIP-EOF-10	Warehouse Personnel Decontamination Station Operation	R10 01-13-00a
EPIP-EOF-11	Dosimetry Records, Exposure Extensions and Habitability	R19 04-03-03

Document	Document Title	Revision/Date
EPIP-EOF-19	Recovery Actions	R7 09-30-98
EPIP-EOF-21	Potassium Iodide Issuance	R4 11-07-00
EPIP-EOF-23	Emergency Response Message System	R5 10-12-99
EPIP-EOF-24	EOF Backup Alert Notification System Activation	R3 09-09-99
EPIP-RR-11	Technical Support Center Director Actions	R14 02-29-00
EPIP-RR-13	Reactor Safety Coordinator Actions	R14 12-09-99a
EPIP-RR-17	TSC Security Coordinator Actions	R15 12-10-02
EPIP-RR-17A	TSC Administrative Logistics Coordinator Actions	R20 11-07-02
EPIP-RR-19A	Operations Liaison Actions	R6 04-15-03
EPIP-RR-21	Operations Support Center Director Actions	R12 09-23-99
EPIP-RR-21A	Maintenance Coordinator Actions	R4 11-30-99
EPIP-RR-22	Protective Measures Coordinator/Manager Actions	R21 07-02-01
EPIP-RR-22A	Chemistry Coordinator Actions	R6 12-07-01
EPIP-RR-25	EOF Dose Assessment Coordinator Actions	R20 11-15-01
EPIP-RR-28	OSC Accountability and Dosimetry Technician Actions	R8 09-25-01

Document	Document Title	Revision/Date
EPIP-RR-29	EOF Administrative Logistics Manager Actions	R20 11-07-02
EPIP-RR-39	Control Room Medical Responder Actions	R0 03-27-01
EPIP-RR-63	EOF Dose Assessment Assistant Actions	R10 11-19-01
EPIP-RR-66	Communication Specialist Actions	R8 08-31-99
EPIP-RR-72	Field Team Specialist Actions	R13 07-09-02
EPIP-RR-87	Radiation Protection Coordinator Actions	R7 08-24-00
EPIP-RR-90	EOF/TSC CHP Communication Actions	R0 10-24-00

Fort Calhoun Station
Unit No. 1

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EPIP-EOF-11

EMERGENCY PLAN IMPLEMENTING PROCEDURE

Title: DOSIMETRY RECORDS, EXPOSURE EXTENSIONS AND HABITABILITY

FC-68 Number: EC 28897

Reason for Change: Revise per writers guide. Revise to clarify how emergency worker extensions are made.

Requestor: M. Reller

Preparer: M. Reller

DOSIMETRY RECORDS, EXPOSURE EXTENSIONS AND HABITABILITY

NON-SAFETY RELATED

1. PURPOSE

- 1.1 This procedure provides instruction for maintaining dosimetry records and habitability during declared emergencies.

2. REFERENCES/COMMITMENT DOCUMENTS

- 2.1 Code of Federal Regulations (10 CFR 20 and 10 CFR 50)
- 2.2 RP-201, Radiation Work Permits
- 2.3 RP-203, Air Sample Collection and Analysis
- 2.4 RP-204, Radiological Area Controls
- 2.5 RPI -6, Alternate Access Control of Radiologically Controlled Area
- 2.6 FC-RP-214-3, RCA Access Refresher Briefing
- 2.7 EPIP-EOF-21, Potassium Iodine Issuance
- 2.8 SAP-19, Dosimetry Issue Emergency Personnel
- 2.9 EPA-400-R-92-001, Manual of Protective Action Guides and Protective Actions for Nuclear Incidents
- 2.10 Ongoing Commitment Documents
- AR 11809, LIC-91-189R

3. DEFINITIONS

None

4. PREREQUISITES

None

5. PROCEDURE

NOTE: Radiation Work Permits are required for all normal entries into a Radiation Controlled Area. Entries under emergency conditions may be exempted from the RWP requirement if approved by Radiation Protection personnel. This approval may be granted by a Shift Radiation Protection Technician, a Radiation Protection Coordinator or a Protective Measures Coordinator. Radiation Protection personnel must accompany any personnel making an entry without an approved RWP.

NOTE: TLDs will normally be obtained from Security when reporting to the site. Extra TLDs are available at the Security buildings, and will be issued to those who need them per SAP-19.

- 5.1 To perform dosimetry issuance in the Control Room, use Attachment 6.1.
- 5.2 To perform dosimetry issuance in the Technical Support Center, use Attachment 6.2.
- 5.3 To perform dosimetry issuance in the Operations Support Center, use Attachment 6.3.
- 5.4 To perform dosimetry issuance in the Emergency Operations Facility use Attachment 6.4.
- 5.5 To approve emergency worker exposure, use Attachment 6.5.
- 5.6 To perform habitability surveys, use Attachment 6.6.
- 5.7 Retain all documentation (logs, assessments, etc.) generated or used during the emergency. At the termination, deliver all documentation to the TSC Administrative Logistics Coordinator in the TSC, or the EOF Administrative Logistics Manager in the EOF.

6. ATTACHMENTS

- 6.1 Dosimetry Issuance in the Control Room
- 6.2 Dosimetry Issuance in the Technical Support Center
- 6.3 Dosimetry Issuance in the Operations Support Center
- 6.4 Dosimetry Issuance in the Emergency Operations Facility
- 6.5 Approving Emergency Worker Exposure
- 6.6 Performing Habitability Surveys

Attachment 6.1 - Dosimetry Issuance in The Control Room

1. Obtain the Dosimetry Issue Kit from the Control Room Emergency Gear Locker.
2. IF a Radiation Control Area (RCA) access point has been established at the Control Room exit, THEN perform the following. Otherwise, go to Step 3.
 - 2.1 Determine the range of the SRDs (Self Reading Dosimeters) to be issued, from the Shift Radiation Protection Technician or the Radiation Protection Coordinator.
 - 2.2 Zero all dosimeters prior to issue.

NOTE: If the individual is leaving site or reporting to the TSC, OSC or another location not requiring an RWP, determine dosimetry requirements per the Shift Radiation Protection Technician or the Radiation Protection Coordinator.

 - 2.3 Issue a self reading dosimeter to all personnel who are entering the RCA and do not have an electronic alarming dosimeter (EAD).
 - 2.4 Record dosimetry issue and RCA access information on Form FC-RP-214-2.
 - 2.5 Upon return of the individual(s), record the RCA exit and accumulated dose information on Form FC-RP-214-2.
3. For personnel who are dispatched to an RCA to perform a job that requires a Radiation Work Permit, perform the following:
 - 3.1 Determine if a SRD is required to be worn while in transit to the normal RCA access point, and issue per Step 2.
 - 3.2 Instruct personnel to go to the main access control point to obtain an EAD and sign in on the required RWP.
 - 3.3 For personnel who were issued a SRD per Step 2.1, report any difference in the SRD versus EAD dose to the Shift RP Technician, as this may indicate that dose was accumulated while in transit to and from the normal RCA access point.

Attachment 6.2 - Dosimetry Issuance In The Technical Support Center (TSC)

1. Obtain the Dosimetry Issue Kit from the TSC Emergency Gear Locker.
2. IF a Radiation Control Area (RCA) access point has been established at the TSC exit, THEN perform the following. Otherwise, go to Step 3.
 - 2.1 Determine the range of the SRDs (Self Reading Dosimeters) to be issued, from the Shift Radiation Protection Technician or the Radiation Protection Coordinator.
 - 2.2 Zero all dosimeters prior to issue.

NOTE: If the individual is leaving site or reporting to the OSC, Control Room or another location not requiring an RWP, determine dosimetry requirements per the Shift Radiation Protection Technician or the Radiation Protection Coordinator.

 - 2.3 Issue a self reading dosimeter to all personnel who are entering the RCA and do not have an electronic alarming dosimeter (EAD).
 - 2.4 Record dosimetry issue and RCA access information on Form FC-RP-214-2.
 - 2.5 Upon return of the individual(s), record the RCA exit and accumulated dose information on Form FC-RP-214-2.
3. For personnel who are dispatched to an RCA to perform a job that requires a Radiation Work Permit, perform the following:
 - 3.1 Determine if a SRD is required to be worn while in transit to the normal RCA access point, and issue per Step 2.
 - 3.2 Instruct personnel to go to the main access control point to obtain an EAD and sign in on the required RWP.
 - 3.3 For personnel who were issued a SRD per Step 2.1, report any difference in the SRD versus EAD dose to the Shift RP Technician or the Radiation Protection Coordinator, as this may indicate that dose was accumulated while in transit to and from the normal RCA access point.

Attachment 6.3 - Dosimetry Issuance In The Operations Support Center (OSC)

1. Obtain the Dosimetry Issue Kit in the OSC.
2. IF a Radiation Control Area (RCA) access point has been established at the OSC exit, THEN perform the following. Otherwise, go to Step 3.
 - 2.1 Determine the range of the SRDs (Self Reading Dosimeters) to be issued, from the Shift Radiation Protection Technician or the Radiation Protection Coordinator.
 - 2.2 Zero all dosimeters prior to issue.

NOTE: If the individual is leaving site or reporting to the TSC, Control Room or another location not requiring an RWP, determine dosimetry requirements per the Shift Radiation Protection Technician or the Radiation Protection Coordinator.

 - 2.3 Issue a self reading dosimeter to all personnel who are entering the RCA and do not have an electronic alarming dosimeter (EAD).
 - 2.4 Record dosimetry issue and RCA access information on Form FC-RP-214-2.
 - 2.5 Upon return of the individual(s), record the RCA exit and accumulated dose information on Form FC-RP-214-2.
3. For personnel who are dispatched to an RCA to perform a job that requires a Radiation Work Permit, perform the following:
 - 3.1 Determine if a SRD is required to be worn while in transit to the normal RCA access point, and issue per Step 2.
 - 3.2 Instruct personnel to go to the main access control point to obtain an EAD and sign in on the required RWP.
 - 3.3 For personnel who were issued a SRD per Step 2.1, report any difference in the SRD versus EAD dose to the Shift RP Technician or the Radiation Protection Coordinator, as this may indicate that dose was accumulated while in transit to and from the normal RCA access point.

Attachment 6.4 - Dosimetry Issuance in the Emergency Operations Facility (EOF)

1. Obtain the Dosimetry Issue Kit.
2. Issue a self reading dosimeter to all personnel that must pass a Radiation Controlled Area Control Point:
 - 2.1 The Radiation Protection Coordinator shall determine what range of SRDs should be issued for the entry(ies).
 - 2.2 Ensure the SRD indicates approximately zero and issue to the individual(s).
 - 2.3 Record the dosimetry issue and RCA access information on Form FC-RP-214-2.
 - 2.4 Upon return of the individual(s), record the accumulated dose and RCA exit information on Form FC-RP-214-2.
3. If going to the plant site report to the TSC upon arrival.

Attachment 6.5 - Approving Emergency Worker Exposure

NOTE: Verbal authorization may be given to emergency responders and Form FC-EPF-5 may be completed afterwards.

1. Obtain a Form FC-EPF-5 for each individual.

NOTE: The facility directors, Control Room Coordinator or Shift Manager in the Control Room, Site Director, or the TSC Director in the TSC, the OSC Director in the OSC or the Emergency Director in the EOF may authorize dose extension up to 5 REM TEDE per year during declared events for workers in their facility. The Command and Control position must authorize doses exceeding 5 Rem TEDE in a year using the criteria per RERP-Section K.

2. Upon authorization by the Command Control Position, complete Form FC-EPF-5. If the authorization is a verbal complete the form as soon as practical.
 - 2.1 Fill-in the top section as stated. Completed the description of the work or task section as much as possible.
 - 2.2 Fill-in the recommended TEDE increase, and if the exposure is to exceed 25 REM have the individual check the box.
 - 2.3 Have the authorizing signature filled-in. If it is a verbal authorization, have the signature filled-in as soon as possible. Then go to Step 3.
 - 2.4 The section for Dosimeter readings is to be filled-in only for exposures that are over 5 REM.
 - 2.5 After the individual's TLD has been read, the dose received will be updated on the individual's form 5.
3. Forward the completed Form FC-EPF-5 to the OSC RP Coordinator.

Attachment 6.6 - Performing Habitability Surveys [AR 11809]

1. Perform habitability surveys for radiation and radioactive material as directed by the Radiation Protection Coordinator or the Protective Measures Coordinator.
2. Use the following as guidelines in the performance of habitability surveys:
 - 2.1 A complete habitability survey should include a general area radiation survey, airborne particulate sample, airborne iodine sample, and a contamination survey. The survey results should be documented on a formal survey diagram, but a log entry of the results is acceptable.
 - 2.2 Consult with the Radiation Protection Coordinator and/or Protective Measures Coordinator to determine if continued habitability surveys are necessary. Plant conditions may not require periodic surveys.
 - 2.3 Habitability surveys, when necessary, should be performed at least once per hour. When levels start to increase, more frequent surveys should be made.
 - 2.4 Installed equipment, such as a PING (Particulate, Iodine and Noble Gas monitor) and an area radiation monitor may be used for initial habitability determination when it is known that there is little possibility of a contamination control problem.
 - 2.5 Should installed equipment be used, and any alarms occur, a complete habitability survey as described above must be performed.
 - 2.6 Consult with the Radiation Protection Coordinator and/or Protective Measures Coordinator to determine if continued habitability surveys are necessary. Plant conditions may not require routine surveys.
 - 2.7 If emergency conditions and/or background radiation levels prevent effective counting of samples, move to a lower background area, or retain the samples for counting at a later date.
 - 2.8 If emergency conditions and/or background radiation levels interfere with whole body counting operations, this function may have to be postponed or performed at a counter located outside the Protected Area.
 - 2.9 Survey results should be reported to the Radiation Protection Coordinator upon completion.
3. For general area dose rates, use the following as guidelines for protecting personnel:
 - 3.1 For general area dose rates >15 mRem/hr, issue SRDs (Self Reading Dosimeters).

Attachment 6.6 - Performing Habitability Surveys [AR 11809]

- 3.2 For general area dose rates >100 mRem/hr, consider relocating to areas of lower dose rates.
- 3.3 For general area dose rates >1000 mRem/hr, relocate to an area of lower dose rate. Only personnel needed to mitigate the consequences of the accident, save plant equipment or a human life should remain.
4. For airborne radioactivity levels, use the following as guidelines for protecting personnel:
 - 4.1 For airborne radioactivity levels $>30\%$ of the Derived Air Concentration, post and control the area as an Airborne Radioactivity Area per RP-204.
 - 4.2 For radioiodine concentrations $>3.3E-8\mu\text{Ci/cc}$, perform the following:
 - 4.2.1 Multiply the concentration times $1.25E6$ to determine the Thyroid dose rate in Rem/hr.
 - 4.2.2 Multiply the Thyroid dose rate times the projected stay time to determine the projected Thyroid Committed Dose Equivalent (CDE) in Rem.
 - 4.2.3 If the projected Thyroid CDE is >1 Rem, consider relocation of personnel to an area of lesser concentration or the issue of SCBAs to exposed personnel.
 - 4.2.4 If the projected Thyroid CDE is ≥ 25 Rem, issue potassium iodide per EPIP-EOF-21, or ensure exposed personnel wear SCBAs.
5. For loose surface contamination, use the following as guidelines for protecting personnel:
 - 5.1 For Contaminated Areas (per RP-204), consider relocation of personnel to an area of lesser contamination.
 - 5.2 For Highly Contaminated Areas (per RP-204), monitor and relocate non-essential personnel to an area of lesser contamination.