



Entergy Operations, Inc.
River Bend Station
5485 U.S. Highway 61
P. O. Box 220
St. Francisville, LA 70775
Tel 225 336 6225
Fax 225 635 5068

Rick J. King
Director
Nuclear Safety Assurance

July 7, 2003

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

Subject: River Bend Station – Unit 1
Docket No. 50-458
License No. NFP-47
Submittal of Revisions to Emergency Implementing Procedures

File No.: G9.5, G9.20.6

RBG-46139
RBF1-03-0128

Ladies and Gentlemen:

Pursuant to 10CFR50 Appendix E, Section V, enclosed is Emergency Implementing Procedures EIP-2-101, Revision 19, "Periodic Review of the Emergency Plan" and EIP-2-102, Revision 23, "Training, Drills, and Exercises." In accordance with 10 CFR 50.54(q), changes to these procedures do not decrease the effectiveness of the Emergency Plan.

If you have any questions or require further information, please contact Barry Allen at (225)-378-3310.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick J. King".

RJK/dnl
enclosure

AD45

Submittal of Revision to the RBS Emergency Implementing Procedure

July 7, 2003

RBG-46139

RBF1-03-0128

Page 2 of 2

cc: U. S. Nuclear Regulatory Commission (2)
Attention: Senior Emergency Planning Inspector
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

NRC Senior Resident Inspector
P. O. Box 1050
St. Francisville, LA 70775

INFORMATION USE

*G12.23.2



ENTERGY

**RIVER BEND STATION
STATION SUPPORT MANUAL
*EMERGENCY IMPLEMENTING PROCEDURE**

****PERIODIC REVIEW OF THE EMERGENCY PLAN***

PROCEDURE NUMBER: EIP-2-101
REVISION NUMBER: *19
Effective Date: * JUN 16 2003

NOTE : SIGNATURES ARE ON FILE.

***INDEXING INFORMATION**

RECEIVED
JUN 16 2003
DOCUMENT CONTROL

TABLE OF CHANGES

LETTER DESIGNATION TRACKING NUMBER	DETAILED DESCRIPTION OF CHANGES

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE NO.</u>
1 PURPOSE.....	3
2 REFERENCES	3
3 DEFINITIONS	3
4 RESPONSIBILITIES	3
5 GENERAL.....	4
6 PROCEDURE.....	4
7 DOCUMENTATION	8
ATTACHMENT 1 - EMERGENCY PLAN REVISION SUBMITTAL FORM (TYPICAL)	9
ATTACHMENT 2 - EMERGENCY PLAN PERIODIC REVIEW FORM (TYPICAL)	10
ATTACHMENT 3 - EXAMPLE EDITORIAL CHANGES.....	11

1 **PURPOSE**

This procedure provides instructions for the review of the Emergency Plan as required by 10CFR50, Appendix E, Section IV.G. and the Emergency Plan, Section 13.3.7.2

2 **REFERENCES**

- 2.1 Title 10, Code of Federal Regulations, Part 50, Section 47(b), and Appendix E
- 2.2 Title 10, Code of Federal Regulations, Part 50, Section 54(q)
- 2.3 Title 10, Code of Federal Regulations, Part 50, Section 54(t)
- 2.4 River Bend Station Emergency Plan [Updated Safety Analysis Report (USAR), Section 13.3]
- 2.5 Updated Safety Analysis Report (USAR), Section 13.4
- 2.6 Technical Requirements Manual (TRM) Section 5.8.2
- 2.7 NMM-EP-305 “10CFR50.54q Review Program”

3 **DEFINITIONS**

None

4 **RESPONSIBILITIES**

- 4.1 Manager - Emergency Preparedness - ensures that the Emergency Plan is periodically reviewed as required by this procedure.

5 **GENERAL**

5.1 A review of the Emergency preparedness program is conducted by Quality Assurance. This review satisfies the requirements of 10CFR50.54(t) for an independent review by persons having no direct responsibility for the implementation of the program.

6 **PROCEDURE**

6.1 Emergency Plan Review

6.1.1. The Manager - Emergency Preparedness should designate an individual(s) to review and update the Emergency Plan as necessary at least once per calendar year.

6.1.2. The reviewer(s) assigned should:

1. Review the Plan for possible changes identified by the following:

1. Written critiques, evaluations of exercises/drills and results of declared emergencies
2. Changes in company, plant, or outside agency organizations
3. Revisions to letters of agreement
4. Changes in state or federal regulations, regulatory guidance, NRC inspection findings or audits
5. Changes in state or local emergency plans
6. Modifications to the plant or site which could affect emergency planning. This includes public use of property within the owner controlled area.
7. Changes to Technical Specifications or the Technical Requirements Manual (TRM)
8. Results of the independent review conducted by Quality Assurance

6.1.3. Document the review using Attachment 2, Emergency Plan Periodic Review Form.

- 6.1.4. Editorial changes as shown in Attachment 3, do not require immediate revision of the Emergency Plan.
1. Editorial changes may be withheld until the next revision required by non-editorial changes.
 2. An On-Site Safety Review Committee (OSRC) review is not required for editorial changes.
 3. Page format or paragraph format changes may be made and will not be considered a revision to the plan as long as content is not changed.
- 6.1.5. If changes are identified that are not editorial per Attachment 3:

NOTE

All pages of the Emergency Plan will be updated to incorporate the new revision number. Only pages marked with changes should be reviewed by the OSRC or, if applicable, sent to the NRC for approval.

1. Prepare a draft copy of the revised Emergency Plan and incorporate the changes plus any identified editorial changes. All changes are to be identified by sidebars in the right margin.
 1. Use Attachment 1 as the cover sheet for the plan change.
2. Evaluate the effect of the change on the Emergency Preparedness Program in accordance with NMM-EP-305.
3. Obtain review and comments as necessary from departments / groups affected by the proposed changes to the Emergency Plan. (e.g. Security, License Operator Training, Chemistry, Radiation Protection)
4. Resolve comments and present the proposed plan change and 50.54q to the OSRC for review.

NOTE

Any changes that do not decrease the effectiveness of the approved Emergency Plan and the plan, as changed, continues to meet the standards of 10CFR50.47(b) and the requirements of 10CFR50 Appendix E may be implemented without prior approval by the NRC.

5. If NRC approval is required prior to implementation, submit a request for approval in accordance with NMM procedure LI-106, *NRC CORRESPONDENCE*.
6. Review the changes for impact on procedures, equipment or training..
7. The Manager – Emergency Preparedness will approve and sign the Emergency Plan Revision Submittal Form after the OSRC review is complete or, if applicable, after NRC approval is received.
 1. Document the implementation date that the change will be effective on the submittal form
8. Following Manager – Emergency Preparedness approval, send the revised Emergency Plan to the Administrative Services Group for distribution.
9. Submit the Emergency Plan revision, submittal sheet (original), and 50.54q review (original) to PPF and place a copy in the EP files.
10. Submit the Emergency Plan revision to the NRC within 30 days of the effective date as specified in 10CFR50, Part 50.54(q) and Appendix E and in accordance with procedure LI-106, *NRC CORRESPONDENCE*.
11. If changes to the Emergency Implementing Procedures (EIPs) or Emergency Planning Procedures (EPPs) are warranted, initiate the applicable changes in accordance with EPP-2-100.

- 6.1.6. Ensure that the Administrative Services Group issues copies of the Emergency Plan revision to the Manager - Emergency Preparedness for distribution to the Louisiana Department of Environmental Quality, the Louisiana Office of Emergency Preparedness, the Mississippi Emergency Management Agency, and the five parish Emergency Management offices within the ten-mile Emergency Planning Zone.
- 6.2 10CFR50.54(t)
 - 6.2.1. The Manager - Quality Assurance shall provide for a review of the Emergency Preparedness Program at least every 12 months, by persons who have no direct responsibility for implementation of the Emergency Preparedness Program.
 - 6.2.2. The review shall include an evaluation for adequacy of interfaces with State and Local governments and of drills, exercises, capabilities and procedures.
 - 6.2.3. The results, along with recommendations for improvements, shall be documented, reported to corporate and plant management, and retained for 5 years.
 - 6.2.4. The portion of the review involving the evaluation for adequacy of interfaces with the State and Local governments shall be available to the applicable State and Local governments for their information and review.
- 6.3 Local support agencies
 - 6.3.1. If revisions to the Emergency Plan affect the Plans or Procedures of local offsite support agencies (e.g. hospitals) the approved change should be provided to the affected agency promptly.
- 6.4 Training
 - 6.4.1. The Manager - Emergency Preparedness should forward approved revisions of the Emergency Plan to the station Training Department as necessary so that changes can be incorporated into training and qualification programs.

DOCUMENTATION

- 7.1 Attachments that document the annual review of the Emergency Plan, 50.54q evaluations and/or screenings, and copies of changes to the Emergency Plan shall be maintained for a period of three years, unless a change decreases the effectiveness of the Emergency Plan. A change determined to decrease the effectiveness of the Emergency Plan that received NRC approval prior to implementation will be maintained for the life of the plant in accordance with 10CFR50.54(q).

EMERGENCY PLAN PERIODIC REVIEW FORM (TYPICAL)

REVIEW DATE: _____
(Start of Review)

Emergency Plan Revision No. _____

Place a check mark in the applicable box to indicate that the Emergency Plan has been reviewed and it has been determined that:

- The periodic review of the Emergency Plan has been completed and a revision is not required.
- The periodic review of the Emergency Plan has been completed and a revision is required however the required change(s) will not reduce the effectiveness of the Emergency Plan.
- The annual periodic review of the Emergency Plan has been completed and a revision is required that must be submitted to the NRC for approval prior to implementation.

Initiate a Condition Report (CR) if a deficiency is identified that represents

1. a potential reduction in the effectiveness of the Emergency Preparedness Program
or
2. non-compliance with 10CFR50.47 or 10CFR50 Appendix E.

CR Number _____ (if applicable)

Review Completed by: _____ / _____ Date: _____
Reviewer Signature KCN

Approved by: _____ / _____ Date: _____
Manager - Emergency Preparedness KCN

EXAMPLE EDITORIAL CHANGES

The following list represents authorized editorial changes that may be made to the Emergency Plan without On-site Safety Review Committee review. All Emergency Plan changes require a technical review and the approval of the Manager - Emergency Preparedness.

Editorial Changes

1. Grammar and spelling errors
2. Incorrect Section and/or Attachment numbers
3. Incorrect sequence of steps numbers
4. Incorrect step and data numbers referenced in the procedure
5. Incorrect reference titles, reference numbers, reference revisions or addition/deletion of references
6. Incorrect page numbers
7. Pagination errors
8. Rewording / renumbering for clarification
9. Updates to organization titles provided the change does not result in a change to the job function or responsibility
10. Corrections to equipment designations or locations to be consistent with approved plant drawings, document, labels or procedure content
11. Correction to equipment operating instructions to match existing equipment
12. Corrections to the table of contents
13. Correction of titles, names, addresses or phone numbers of offsite agencies or support organizations.

INFORMATION USE

*G12.23.2



ENERGY

**RIVER BEND STATION
STATION SUPPORT MANUAL
*EMERGENCY IMPLEMENTING PROCEDURE**

****TRAINING, DRILLS, AND EXERCISES***

PROCEDURE NUMBER:	*EIP-2-102
REVISION NUMBER:	*23
Effective Date:	* <u>JUN 19 2003</u>

NOTE : SIGNATURES ARE ON FILE.

RECEIVED

JUN 19 2003

DOCUMENT CONTROL

***INDEXING INFORMATION**

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE NO.</u>
1 PURPOSE.....	2
2 REFERENCES	2
3 DEFINITIONS.....	2
4 RESPONSIBILITIES.....	3
5 GENERAL.....	3
6 PROCEDURE.....	3
7 DOCUMENTATION	9

1 **PURPOSE**

This procedure establishes the training requirements for personnel who perform emergency functions and the requirements for conducting drills and exercises.

2 **REFERENCES**

- 2.1 River Bend Station (RBS) Emergency Plan [Updated Safety Analysis Report (USAR) Section 13.3]
- 2.2 River Bend Station (RBS) Technical Requirements Manual
- 2.3 TQ-110, Emergency Preparedness Training Program
- 2.4 Licensee Commitments (LC) 13617 and 13648

3 **DEFINITIONS**

- 3.1 Annual - For the purposes of this procedure annual is defined as that period between January 1st and December 31st of each year except for General Employee Training (GET) which is defined per NMMTQ-107, *General Employee Training*.
- 3.2 Exercise - An activity aimed at testing the integrated capability and a major portion of the basic elements of the Emergency Planning and Response Organizations. An exercise involves a major portion of the Emergency Response Organization and is evaluated by the NRC.
- 3.3 Mini-Drills - A slightly shorter version of a Site Drill used to train and/or qualify ERO members. They are used to develop team participation and good communications. They can also be used to correct any problems identified during Site Drills.
- 3.4 Site Drill - A Site Drill or training drill is used to train and/or qualify ERO members. They are used to develop team participation and good communications. These could have evaluations performed by select individuals in each facility.
- 3.5 Tabletop - A specialized training session conducted for an Emergency Response Facility or group. Tabletops are seminar style meetings in a

facility to discuss objectives and expectations of ERO personnel. These sessions are designed to emphasize team building and correct previously identified weaknesses.

4 **RESPONSIBILITIES**

4.1 Manager - Emergency Preparedness - ensures the implementation of this procedure.

5 **GENERAL**

NONE

6 **PROCEDURE**

6.1 Emergency Response Organization (ERO) Training

6.1.1. Personnel assigned to the ERO shall be qualified in accordance with TQ-110, Emergency Preparedness Training Program.

6.1.2. The Manager - Emergency Preparedness has the authority to waive requirements on an individual basis according to their background and training or disqualify as deemed appropriate. This will be documented in a memorandum to file.

C 6.2 Offsite Support Agency Training

6.2.1. Offsite support agencies are offered training on an annual basis.

6.2.2. Offsite training attendance records will be kept on file for a period of two years.

6.2.3. Annual training that is declined will be documented with a memorandum to file.

6.2.4. Offsite attendance records will be forwarded to Permanent Plant Files (PPF).

6.3 Media Training

- 6.3.1. Coordinated programs to acquaint news media with the Emergency Plans, information concerning radiation, and points of contact for release of public information in an emergency will be offered to the media on an annual basis.**
- 6.3.2. Emergency Preparedness personnel will document this training with a memorandum to file.**

6.4 Emergency Preparedness should:

- 6.4.1. Provide individuals with the appropriate initial emergency training and annual requalification training.**
- 6.4.2. Issue notices of required reading to employees. Required reading forms will be kept on file for a period of two years.**
- 6.4.3. Document training attendance.**
- 6.4.4. Maintain training records for all emergency response personnel.**
- 6.4.5. Ensure that the General Employee Training (GET) material for Emergency Preparedness is reviewed annually and documented with a memorandum to file. Problems identified in the review should be forwarded to the TQ-107 Training Procedure sponsor.**

6.5 Drills and Exercises

- 6.5.1. Periodic site drills and exercises will be conducted.**
- 6.5.2. The requirement for participation in a drill/exercise may be met as a participant, coach, evaluator, or controller.**
- 6.5.3. The Manager - Emergency Preparedness or designee should:**
 - 1. Coordinate with EOI department heads and offsite agencies in planning and scheduling drills and exercises.**
 - 2. Direct development of drill and exercise scenarios and necessary support material.**

3. Direct necessary drill/exercise advance materials to be forwarded to state/local/federal government agencies, at the appropriate times.
4. Direct the assignment of personnel to control, evaluate, and coach drills/exercises.
5. Prepare a written evaluation of the drill/exercise based on critique comments. Describe any identified deficiencies/weaknesses. Forward a copy of the evaluation to the V.P. - Plant Operations and his direct reports.
6. Ensure records of all drills/exercises are maintained for a period of five years.

6.5.4. Drill Descriptions, Types and Frequency

NOTE

These drills may be conducted independently, in a site drill, or biennial exercise.

1. Site Drills

1. Periodically conducted for the purpose of training and qualifying personnel.
2. Tabletops in the facilities are normally conducted prior to the site drill.

2. Communication Drills

1. Communications between the River Bend Station emergency response facilities, the States of Louisiana and Mississippi, local Emergency Operations Centers (EOCs) and offsite monitoring teams shall be tested at least annually.
 - a The Communications drill with State and local agencies may be met by the satisfactory performance of the applicable section in EPP-2-502 or during a drill/exercise.
 - b The Communications drill with the offsite monitoring team may be met by demonstration in a site drill or exercise.

2. Test the ability of communicators to understand the content of messages passed.
 3. The capability of Security to communicate with the National Guard, when posted in the Owner Controlled Area, will be demonstrated once per six year period by simulating the presence of the National Guard during a site drill.
3. Medical Emergency Drills
 1. Involve a simulated contaminated/injured individual and provide for participation by ambulance and hospital services.
 2. Offsite portions may be performed as part of the required annual medical exercise.
4. Radiological Monitoring Drills
 1. Conducted annually, and will include the collection and analysis of sample media such as water, grass, soil, and air from the owner controlled and nearby offsite areas. These samples will be collected by offsite monitoring teams.
 2. Communications and record keeping of the sample locations shall be included.
5. Health Physics Drills
 1. Involve response to and preliminary analyses of simulated elevated airborne and liquid samples, as well as direct radiation measurements in the environment.
 2. These drills shall be conducted semi-annually.
6. PASS Drills

Analysis of in-plant liquid samples with actual, elevated radiation levels using the Post-Accident Sampling System shall be conducted annually.

C

7. Evacuation and Site Accountability Drills

- 1. A Protected Area evacuation drill shall be conducted annually. The use of the South Train Gate will be tested every 6 years.**
- 2. An Owner Controlled Area notification drill will be conducted once every 2 calendar years.**
- 3. Once every six years, the drill will ensure personnel are aware of proper routes and assembly points, by selecting individuals to go to an assembly point.**
 - a Demonstration of the assembly points will be alternated between the Assembly Area East, Assembly Area West, and the Alternate Assembly Area.**
- 4. An accountability drill shall be held simultaneously with the Protected Area evacuation to ensure that all personnel have either been evacuated or accounted for in the Protected Area.**
- 5. Search and Rescue will be performed for selected individual(s) once every six years.**
- 8. A Severe Accident Management Guidelines drill or tabletop should be conducted once every 3 years.**

6.5.5. An evaluated exercise will be conducted biennially, which is evaluated by the NRC and FEMA.

6.5.6. Scenario Requirements

- 1. Scenarios should contain the following, as applicable:**
 - 1. Introduction section**
 - 2. Scope and Objectives**
 - 3. Exercise information**
 - 4. Controller information**
 - 5. Player information**
 - 6. Schedule of events**

7. Scenario information
 8. Messages and plant data sheets
 9. Radiochemistry and onsite radiation data
 10. Meteorological and radioactive release data
 11. JIC rumor control messages
2. Scenarios should simulate an emergency that results in offsite radiological releases when the offsite field monitoring teams or the offsite agencies are participating in the drill/exercise.
 3. Evaluated Exercise scenarios will be varied biennially so that all major portions of the Emergency Plan and emergency response organization are tested over a six-year period.
 4. The biennial exercise will be initiated between 6:00 p.m. and 4:00 a.m., once every six years. (This requirement may be conducted independently).
 5. The biennial exercise will be unannounced, once every six years. (This requirement may be conducted independently).
 6. Exercise scenarios will allow for adequate response and decision-making by participants.
 7. Biennial exercise scenarios will be in sufficient detail to allow for participation by state and local governments. Periodically, federal response organizations will be invited to participate.
 8. Evaluated Exercise scenarios shall be provided to the Federal Emergency Management Agency (FEMA) on the following schedule:
 1. The narrative summary and sequence of events is due 90 days prior to the scheduled exercise date.
 2. The complete scenario package including operational data and controller information is due 60 days prior to the scheduled exercise date.

C

3. Minor changes to scenario data and a schedule for meetings, briefings and critiques are due one week prior to the scheduled exercise date.

7 **DOCUMENTATION**

Documentation of training attendance for all emergency response personnel shall be forwarded to Permanent Plant Files (PPF) in accordance with RBS Technical Requirements Manual (TRM).