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**MONTICELLO NUCLEAR GENERATING PLANT**  
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**EMERGENCY PLAN IMPLEMENTING PROCEDURE**

Furnished with this letter is a revision to the Monticello Nuclear Generating Plant Emergency Plan Implementing Procedures. The following procedure is revised:

<u>Procedure</u>	<u>Procedure Title</u>	<u>Revision</u>
A.2-206	Work Control During Emergencies	5

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 The superseded procedure should be destroyed.

This revision does not reduce the effectiveness of the Monticello Nuclear Generating Plant Emergency Plan.

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**1.0 PURPOSE**

The purpose of this procedure is to provide instructions and guidance for the control and coordination of work (including operations activities) during a declared emergency (Alert or higher) at the MNGP.

**2.0 APPLICABILITY**

2.1 An emergency (Alert classification or higher) has been declared and,

2.2 Duty Operators are being dispatched from the Control Room or Emergency Teams are being dispatched from the OSC (or Chemistry Lab).

**3.0 ORGANIZATION AND RESPONSIBILITIES**

3.1 The Emergency Director is responsible for:

3.1.1 Overall direction and control of emergency response activities on-site including emergency work.

3.2 The TSC Group Leaders are responsible for:

3.2.1 Emergency work control in the TSC including identifying the need for emergency teams and establishing emergency task priorities.

3.3 The Duty Shift Manager (SM) and Control Room Supervisor (CRS) are responsible for:

3.3.1 Dispatching and coordination of duty plant Operators from the Control Room.

3.4 The OSC Coordinator is responsible for:

3.4.1 Selection, assembly, briefing, and coordination of emergency teams dispatched from the OSC (including in-plant sampling teams dispatched from the Chemistry Lab).

**4.0 DISCUSSION**

This procedure provides instructions and guidance for the control and coordination of work during a declared emergency (Alert classification or higher) at the MNGP.

Section 6.1 provides guidance for the Emergency Director (Duty SM or CRS) on the implementation of Strict Plant Status Controls in order to gain positive control of work activities within the plant.

Section 6.2 provides instructions for the SM or CRS, TSC and OSC for the coordination of duty Operators dispatched and directed by the Control Room while Section 6.3 contains instructions for the Operators themselves. To ensure adequate

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radiological precautions are taken during an emergency, this procedure requires all Operators (dispatched from the Control Room) check-in (in-person or by radio) with the OSC prior to departing the Plant Administration Building.

Sections 6.4 and 6.5 provide instructions for the coordination of emergency work activities in the TSC and OSC respectively.

## **5.0 PRECAUTIONS**

- 5.1 The completion and processing of an Emergency Work Request and/or an Emergency RWP should not delay the initiation of lifesaving or search and rescue activities. In these cases, appropriate precautions should be taken to protect rescue personnel from anticipated radiological and/or conventional hazards and the rescue activities initiated immediately.
- 5.2 For personnel and equipment protection an Emergency Work Request (and associated Isolation Instructions) should be completed prior to conducting emergency work in which personnel injury or equipment damage may result from inadequate work controls.

## **6.0 INSTRUCTIONS**

### **6.1 Implementation of Strict Plant Status Controls**

- 6.1.1 The Emergency Director (SM until relieved) should evaluate plant conditions and work in progress to determine if the implementation of strict plant status controls will aid in gaining positive control of the emergency situation.
- 6.1.2 If the Emergency Director determines that implementation of Strict Plant Status Controls is warranted, the following announcement should be made using page access 305:

**NOTE:** The announcement of Strict Plant Status Controls should be directed by the ED and made from the Control Room or Technical Support Center, whichever is most convenient.

**"ATTENTION ALL PLANT PERSONNEL. A(N) (SPECIFY EMERGENCY CLASS) HAS BEEN DECLARED. STRICT PLANT STATUS CONTROLS ARE IN EFFECT. TERMINATE ALL WORK IN PROGRESS IMMEDIATELY, EXCEPT EMERGENCY WORK APPROVED BY THE CONTROL ROOM SUPERVISOR. DO NOT INITIATE OR RESUME WORK UNLESS SPECIFICALLY AUTHORIZED BY THE CONTROL ROOM SUPERVISOR. STANDBY FOR FURTHER INSTRUCTIONS."**

- 6.1.3 The Emergency Director should consider initiating a local or plant evacuation if positive access to the Radiological Controlled Area is desired. Refer to A.2-301 (EMERGENCY EVACUATION) for instructions.

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**NOTE:** At an Alert classification normal work activities will continue in the Radiological Controlled Area until terminated by implementation of Strict Plant Status Controls. However, Strict Plant Status Controls do not aid in gaining positive control over access to the Radiological Controlled Area. If desired, this should be accomplished by evacuating the area or building(s) and establishing strict access control measures for evacuated areas in cooperation with the Rad Prot Coord in the OSC.

- 6.1.4 Repeat the Strict Plant Status Control PA announcement as necessary.
- 6.1.5 When circumstances indicate that Strict Plant Status Controls may be terminated, the Emergency Director should direct a PA announcement to that effect.

## **6.2 Coordination of Operators from the Control Room**

- 6.2.1 The duty SM/CRS in the Control Room should dispatch duty Operators as follows:
  - A. All Operators should obtain a portable radio and maintain frequent radio communication with the Control Room and OSC.
  - B. All Operators should check-in with the OSC (in-person or by radio) prior to departing the Plant Administration Building (regardless of their destination in-plant or on-site) to ensure appropriate radiological precautions are implemented (e.g., exposure controls, protective clothing, etc.).

**NOTE:** In the event of an emergency situation which requires evacuation of the Control Room, the evacuating Operators may proceed directly to the alternate shutdown panel without checking in at the OSC.

- 6.2.2 When dispatching an Operator from the Control Room, the Shift Manager/Control Room Supervisor should immediately inform the Operations Group Leader of the Operator's task and work location.
- 6.2.3 When notified that an Operator is being dispatched, the Operations Group Leader should announce the Operator's task and work location in the TSC.
- 6.2.4 Refer to section 6.4 for instructions on the control and coordination of emergency work activities in the TSC and OSC.

## **6.3 Operator Instructions**

- 6.3.1 Upon declaration of an emergency (Alert or higher classification), all Duty Operators should contact the Control Room immediately (via radio or telephone) for instructions and, unless directed otherwise, they should report (in-person) to the Control Room.
- 6.3.2 If a Site Area Emergency (or higher) is declared or a Plant (or Site) evacuation is conducted, all duty Operators should report to the Control Room for personnel accountability.

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- 6.3.3 During an emergency (Alert classification or higher), all duty Operators dispatched by the Control Room should check-in (in-person or by radio) with the OSC prior to departing the Plant Administration Building.
- 6.3.4 After being assigned an RWP number by the Rad Prot Coord in the OSC, Operators should log-in using an electronic dosimeter. If electronic dosimeter is not available, Operators should be issued dosimetry (PICs) by the Rad Prot Coord and their exposure tracked in the OSC.
- 6.3.5 Operators dispatched from the Control Room should obtain a portable radio (from the Work Execution Center or OSC Command Center) and remain in contact with the Control Room (and OSC).
- 6.3.6 Upon completion of the task, Operators should report to the OSC (in person or via radio) and then to the duty SM/CRS in the Control Room.

#### **6.4 Emergency Work Control In the TSC**

- 6.4.1 When a task is identified which requires a team be dispatched from the Control Room or OSC, it should be announced in the TSC.
- 6.4.2 The TSC Group Leaders should briefly discuss the task and its importance to overall accident mitigation objectives to determine if it must be done immediately or whether it is a short or long-term recovery item.
- 6.4.3 The Maintenance Group Leader should facilitate discussion of the task with TSC Group Leaders to determine:
  - A. The priority of the task using the Emergency Work Control Job Aid (Figure 7.1)
  - B. If Form 5790-107-04 (EMERGENCY WORK REQUEST) should be issued to control the work.
- 6.4.4 When a priority has been assigned, the Maintenance Group Leader should immediately communicate preliminary details of the task and its priority to the OSC Coordinator. The information should include:
  - A. A brief description of the task and the work location.
  - B. The qualifications or special skills (if any) that may be required to perform the task.
  - C. The priority which describes the timeliness and importance of the task relative to other emergency tasks already identified.
  - D. If an Emergency Work Request (EWR) will be issued for the task.

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- 6.4.5 The TSC Emergency Work Status Communicator should communicate the details of the task to the OSC Team Tracking Communicator and coordinate the assignment of the Emergency Team number (assigned by the OSC).

**CAUTION**

**To avoid confusion when directing emergency teams do not reuse (reassign) Emergency team numbers.**

- 6.4.6 The TSC Emergency Work Status Communicator should update the Emergency Work Status Board with the task description, priority and team number.
- 6.4.7 If Form 5790-107-4 (EMERGENCY WORK REQUEST) will be used to control the work, the responsible TSC Group Leader should initiate the form. The form(s) should be processed in the TSC as follows:
- A. Complete PART A of the form.
  - B. If isolation is required, prepare it in accordance with 4 AWI-04.04.01 (EQUIPMENT ISOLATION) to accompany the Emergency Work Request.
  - C. The Maintenance Group Leader should assign an EWR number, log the task on Form 5790-107-05 (EMERGENCY WORK REQUEST LOG) by recording the applicable information on the form.
  - D. If at a Site Area Emergency (or higher) the Maintenance Group Leader should confer with the REC to determine the appropriate individual exposure limits for the team members (i.e., remaining quarterly available, 10 Rem, etc.). The Maintenance Group Leader (or REC) should indicate the limit on the form.
  - E. The Maintenance Group Leader should immediately forward the completed Emergency Work Request form to the OSC Coordinator.
- 6.4.8 When the Emergency Team is dispatched, and throughout the task, the TSC Emergency Work Status Communicator should monitor task progress and update the TSC Emergency Work Status Board as necessary.
- 6.4.9 Upon notification (from the OSC Team Communicator) that the task is complete the TSC Emergency Work Status Communicator should inform the TSC Group Leaders and update the status board. Completed tasks (teams) should remain on the TSC board until space is needed to enter new teams and then the oldest completed task should be erased.

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6.4.10 The OSC Coordinator should provide an update to the Maintenance Group Leader on task results and the Maintenance Group Leader inform the TSC staff.

## 6.5 Emergency Work Control In the OSC

### **CAUTION**

**The process of selecting, briefing and preparing Emergency Teams should be followed for all Emergency Teams dispatched from the OSC. However there are certain emergency tasks for which time may be a crucial factor (lifesaving, etc.). In these cases, team preparation should be expedited while ensuring the safety of team members is adequately protected.**

- 6.5.1 When notified by the TSC of an emergency task determine if duty Operators or an OSC Team is required.
- 6.5.2 Obtain a brief description of the task, the work location and the priority which indicates the timeliness and relative importance of the task to other emergency work already identified as follows:
- A. If duty Operators (from the Control Room) or Chemistry personnel (from the Chemistry Lab) are being dispatched, obtain the information from the Maintenance Group Leader or Chemistry Coordinator.
  - B. If an OSC Emergency Team is requested review the Emergency Work Request form (if one was initiated for the work) or obtain the information from the Maintenance Group Leader.
- 6.5.3 Announce and briefly review the task in the OSC Command Center including the work location. For teams dispatched from the OSC determine:
- A. The type of personnel to assign to the OSC team (e.g., electricians, mechanical maintenance, Rad Prot Tech, etc.) and personnel available by reviewing the OSC PERSONNEL AVAILABILITY board to identify potential team candidates.
  - B. The topics to be reviewed in the team pre-job briefing including precautions, tagouts, isolations, and special instructions.
- 6.5.4 Direct an OSC Maintenance Supervisor and/or the Rad Prot Coord to prepare the Emergency Team as follows:
- A. For Operators dispatched from the Control Room or Chemists dispatched from the Lab, the Rad Prot Coord should ensure proper radiological controls are used including dosimetry and protective clothing. This should occur when the team checks in (in person or by radio) with the OSC.

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- B. For teams dispatched from the OSC, select, assemble, brief and prepare the emergency team in accordance with A.2-107 (ACTIVATION AND OPERATION OF THE OSC). If isolation is required ensure an Operator is assigned to the OSC team.
- 6.5.5 Assign an Emergency Team number (the next team number in numerical sequence from the OSC Team Tracking Board) and direct the OSC Team Tracking Board be updated with the team number, task description and priority (1-3).
  - 6.5.6 When the Emergency Team members have been assigned, direct the OSC Team Tracking Board be updated by moving team member name tags from the OSC Personnel Availability Board to the OSC Team Tracking Board.
  - 6.5.7 Complete the Emergency Work Request form (if used) with the names of the Emergency Team members.
  - 6.5.8 When the team is prepared, direct the OSC Team Radio Communicator to establish and maintain radio contact with the team.
  - 6.5.9 The team should proceed to Access Control to log-in and obtain respirators or SCBAs (if required). Final team preparations at Access Control should be conducted by the Access Control Rad Prot Tech in accordance with A.2-108 (ACCESS CONTROL DURING EMERGENCIES).
  - 6.5.10 When the team is dispatched inform the Maintenance Group Leader. Direct the OSC Team Tracking Communicator to update the TSC Emergency Work Status Communicator.
  - 6.5.11 If problems are encountered by the Emergency Team inform the TSC. Assist the TSC (and Emergency Team) in developing alternate methods, routes or other strategies to overcome any problems encountered. If necessary, recall the team to the OSC.
  - 6.5.12 When teams return to the OSC assign a Maintenance Supervisor and/or Rad Prot Coord to debrief the team (if necessary).
  - 6.5.13 Ensure the OSC Team Tracking and OSC Personnel Availability Boards are updated upon return of the team.
  - 6.5.14 Ensure the OSC Team Tracking Communicator updates the TSC Emergency Work Status Communicator.
  - 6.5.15 When briefed on the results of the Emergency Team task update the Maintenance Group Leader.

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- 6.5.16 Retain Form 5790-107-04, Form 5790-107-02 (EMERGENCY RWP CHECKLIST) and Form 5790-401-01 (EMERGENCY EXPOSURE AUTHORIZATION FORM) and any other documents related to the Emergency Team task. Submit the documents to the document control for retention as emergency records.

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## 7.0 FIGURES

### FIGURE

#### 7.1 Emergency Work Control Job Aid

##### 1. EWR GUIDANCE

###### 1. **Activities not requiring EWR.**

- a. Operator activities specified in EOP(s), ARP(s), AOP(s) and Normal Operating Procedures.
- b. Minor maintenance activities.
- c. Lifesaving, firefighting, search and rescue activities, etc.
- d. Damage assessment activities.

###### 2. **Activities which should be performed using an EWR.**

- a. Emergency work in which personal injury may result from inadequate work controls (i.e., isolations).
- b. Emergency work in which equipment damage may result from inadequate work controls.
- c. Emergency work which requires coordination of multiple teams.

##### 2. PRIORITY CODE GUIDANCE

###### 1 **Priorities:**

- Critical Functions, Preservation/Restoration (i.e. EOP Activities)
- Firefighting
- Search and Rescue
- Medical Emergency
- Prevent or Terminate any Radioactive Release Affecting Public Safety

###### 2 **Priorities:**

- Restoration of Engineered Safeguard Systems
- Damage assessment activities
- Survey Teams and PASS Sampling activities

###### 3 **Priorities:**

- Emergency Operational Considerations (as time permits)
- General Repair
- Damage Investigation

##### 3. **TRACKING WORK TEAM STATUS (3 Categories)**

1. Pending - Work Tasks identified
2. Active - Team has been assigned task (briefed) and work team number
3. Complete - Team has completed the task and debriefed