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243 - 243 - RADIOLOGICAL LIAISON

REMOVE MANUAL TABLE OF CONTENTS DATE: 08/22/2003

ADD MANUAL TABLE OF CONTENTS DATE: 09/09/2003

CATEGORY: PROCEDURES TYPE: EP

ID: EP-PS-243

REPLACE: REV:5

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REMOVE: PCAF 2003-1605 REV: N/A

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A045

**COMMENTARY ON FILLING OUT THE
PROTECTIVE ACTION RECOMMENDATION FORM**

1. **Affected Unit** - The affected unit should be "one", "two", or "one and two" (1, 2, 1 and 2). For the case where both units are affected but the classification and primary EOC actions are due to the events on one unit, specify that one unit as the affected unit. "One and two" should be listed only when the two units are equally affected or substantive prevention or mitigation efforts are being directed to both units.
2. **Emergency Classification, Basis** - The intent is to list each EAL that led to the current Classification. If both units are affected, list the EAL(s) that lead to the most severe classification on each unit and specify to which unit the EALs apply.
3. **Emergency Actions, Bases** - The intent is to describe the bases for the Actions implemented, especially if they are not a mandatory result of the EAL and Classification described above. For the EOF, completion of this line is optional.

Example wording for a local area evacuation may be "local hi rad and hi temp alarms in HPCI pump room." Example wording for administration of KI may be "dose projections > 10 rem to team crimping release path piping."

4. **Plant Status as Basis for PAR** - The intent is to briefly describe key elements of plant status and/or prognosis that entered into the decision making for the PAR that was adopted. Examples to consider may include: operating status (shut down, ATWS, etc.), indications of fuel (or cladding) degradation, ability to cool the core, integrity of primary and secondary containment, status of ventilation treatment (filtration, etc.) and status of remedial or mitigating actions.

An example completed statement for EAL 3.4 may be: High reactor coolant activity and inability to terminate coolant leak outside primary containment within several hours.

5. **Radioactive Release as Basis for PAR** - An event-related release is in progress if any one of the criteria listed on EP-AD-000-511 "Identification of Release in Progress" are met. (See Tab 10.) This judgement is made by the "Facility Lead" (ED or RM), using input from appropriate facility supervision. Knowledge of which criterion was used to state "a release is in progress" will be helpful in the communication process from the PAR form. That criterion may be documented on the PAR form on the blank line below "Weather Conditions."

The rationale for documentation of the basis for the decision regarding total site release rate being > TRM Limits is as follows:

- a. Valid effluent monitor or equivalent information is available and indicates the release exceeds the TRM limit, and/or
- b. Valid in-field readings equal to or greater than 0.1 mrem/hr. whole body, 68.4 mrem/hr. thyroid CDE, or 100 ncpm on an Iodine cartridge are available, or valid RMS "release" alarms have activated.

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- c. If valid effluent monitoring or equivalent information is not available, the "Engineering Judgement" box should be checked if EOF/TSC/CR facility management has judged that SSES is releasing above the TRM limits, even though definitive information is not available. This box should not be checked if effluent monitoring or field measurements indicate a release is in progress above TRM limits.

For the field data confirmation line, the "yes" block should be checked if the correlation between field data and projected data is reasonable (ratio of measured to projected data is between 0.1 and 5.0). The "N/A" block should be checked only if the correlation cannot be determined (that is, effluent datasource unavailable or field data do not exceed minimum detectable levels as noted in 5.b above). The basis for "N/A" may be documented on the PAR form on the blank line below "Weather Conditions".

Examples of other information to be included on the blank line (below "Weather Conditions") may be the duration of the release, whether release rates are increasing or decreasing, and/or if there was a puff release. The vent(s) that is(are) the primary release point(s) may also be included if relevant to the discussion process. The intent is to document information used in the PAR decision making.

6. **Weather Conditions as Basis for PAR** – Weather conditions that contributed to the PAR decision making should be described. Examples of information to include may be wind direction (or affected sector), wind speed, stability class, precipitation level, and/or ice/snow conditions. If a dose projection printout is to be attached, there is no need to write on information that is on that form.
7. **Dose Projections as Basis for PAR** – The intent is to indicate whether projected doses are less than or greater than values used in the PAR decision making flowchart. Specific listing of calculated TEDE and/or child thyroid CDE values is discouraged. An example supplemental comment may be "controlling dose is child thyroid CDE from releases of radioiodines."
8. **Approval of Form Contents** – The "Facility Lead" (ED or RM) is to approve if changes in Classification or PAR have occurred since the form was last transmitted. If no change has occurred, the "dose assessment lead" (RPC or DASU) normally would approve the form, although the Facility Lead always has the authority to sign the form.

When the Form is believed to be complete, the preparer should double-check the Form's completion status. For example, the preparer should ensure that each set of "boxes" has at least one box checked. (For event information, none of the four classification blocks should be checked. In that case, "Event Termination" may be listed as the "Basis: EAL#".)