

October 31, 2003
PY-CEI/NRR-2745L

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
Submittal of Emergency Plan
Implementing Instructions

Gentlemen:

Pursuant to 10 CFR 50 Appendix E, enclosed are changes to the Emergency Plan Implementing Instructions (EPIs) for the Perry Nuclear Power Plant. These changes constitute revisions, temporary changes, or reissued pages. Please follow the updating instructions per the attached Controlled Document Instruction Sheet and return the signed Acknowledgment of Receipt form.

If you have questions or require additional information, please contact me at (440) 280-5589.

Very truly yours,



David L. Bauguess, Supervisor
Emergency Planning Unit

DLB:byr

Enclosure

cc: NRR Project Manager
NRC Resident Inspector
NRC Region III, Incident Response Center w/attachments

A045

FIRSTENERGY CORPORATION
PERRY NUCLEAR POWER PLANT
UNIT 1 & 2

ACKNOWLEDGMENT OF RECEIPT

Title Emergency Plan Implementing Instructions EPI-B9/ Rev.4

Control No. 60

Letter No./Date PY-CEI/NRR-2745L / October 31, 2003

Signature

Date

Title

Return to:

Perry Nuclear Power Plant
Attn: B.Y. Richardson, A240
P. O. Box 97
Perry, Ohio 44081

FIRSTENERGY CORPORATION

Perry Nuclear Power Plant

Controlled Document Instruction Sheet

Manual: Emergency Plan Implementing Instructions EPI-B9/ Rev.4

Control Number 60

Revision
Number

Insert

Remove and Replace

4

EPI-B9 / Rev 4

Reissue Entire Document

INFORMATION ONLY

PERRY OPERATIONS MANUAL

PNPP



Emergency Plan Implementing Instruction

No. 1262

TITLE: EMERGENCY RECORDS

REVISION: 4

EFFECTIVE DATE: 10-16-03

PREPARED: Sherri Miller (Procedure Correction)

9-17-03

/ Date

EMERGENCY RECORDS

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SCOPE OF REVISION:

- Rev. 4 - 1. Revised to correct the revision level of form 7650.
2. Minor format/administrative corrections made.

EMERGENCY RECORDS

1.0 PURPOSE

To define responsibilities and actions necessary to ensure that events and data recorded during an emergency per the Emergency Plan Implementing Instructions (EPIs) are accurately documented and properly reviewed, reproduced, distributed, and entered into records retention cycle. This documentation shall be sufficient to satisfy regulatory requirements and to permit reconstruction of events for critique and analysis.

<OAI-1702> will govern the maintenance of Rounds Sheets, logs, and records in the Control Room. Security-related logs and records shall be maintained by the Central Alarm Station (CAS) per <SPI-0001> and the Secondary Alarm Station (SAS) per <SPI-0029>.

2.0 REFERENCES

2.1 Source References

1. Emergency Plan for PNPP docket Nos. 50-440, 50-441
2. EPI-A6: Technical Support Center Activation
3. EPI-A7: Operations Support Center Activation
4. EPI-A1: Emergency Action Levels

2.2 Use References

1. EPI-A10: Recovery
2. EPI-B1: Emergency Notification System
3. OAI-1702: Operations Section Rounds Sheets, Logs and Records
4. SPI-0001: Security Central Alarm Station Post Instruction
5. SPI-0029: Secondary Alarm Station Post Instruction
6. PAP-1701: Records Management Program
7. Commitments addressed in this document:

P00063

3.0 DEFINITIONS

3.1 Emergency Record

Any report, survey form, sample analysis form, dose assessment form, data form, log, or other documentation generated during an emergency which records data, conditions or actions taken, and/or the results of such.

4.0 RESPONSIBILITIES

4.1 Shift Supervisor

1. Ensure that records generated per the EPIs by Control Room staff, the Secondary Alarm Station (SAS), and OSC staff (if the TSC was not activated) are collected, reviewed, and disposed of properly in accordance with this instruction.

4.2 OSC Coordinator

1. Ensure that all records generated by OSC staff are collected, reviewed, and disposed of properly in accordance with this instruction.

4.3 TSC Administrative Assistant

1. Ensure that all records generated by TSC staff, OSC staff, and Radiation Monitoring Teams (if the EOF was not activated) are collected, reviewed, and disposed of properly in accordance with this instruction.

4.4 EOF Manager

1. Ensure that all records generated by EOF staff, Back-up EOF staff (if activated), and Radiation Monitoring Teams are collected, reviewed, and disposed of properly in accordance with this instruction.

4.5 Onsite Emergency Planning Coordinator

1. Ensure records generated by emergency response personnel are collected promptly, reviewed for completeness, and unwanted paperwork eliminated.
2. Ensure that record originals are processed per this instruction and that a copy of records are made available for reproduction and distribution.

4.6 Records Management Support Team (RMST) Member, Emergency Planning Unit (EPU)

1. Ensure that record originals are processed for retention per <PAP-1701>.

5.0 ACTIONS

5.1 Record Maintenance

5.1.1 Emergency Response Organization (ERO) Personnel:

NOTE: Required ERO Logbooks (Attachment 1) designates which ERO position or functions are required to maintain specific logs of their area of responsibility.

1. Use an Emergency Log/Data Sheet (PNPP No. 7650, Attachment 2) to document a log of events, actions taken or considered, rational for decisions made, deviations from approved procedures, and other information which would allow the accurate reconstruction of events relative to your ERO position or function.

Ensure information recorded on yellow/white pad paper or scrap paper is properly recorded on an Emergency Log/Data Sheet (PNPP No. 7650) or a Communication Record Sheet (PNPP No. 8264, Attachment 3) to properly capture information.

NOTE: OSC Coordinator's Log (Attachment 4), TSC Operations Manager's Log (Attachment 5), and EOF Emergency Coordinator's Log (Attachment 6) provide suggested guidelines for information which should be recorded in their respective logbooks.

2. Record specific actions, questions or inquiries, and responses between facilities, between staff member, or received over telephone line or radio, on a Communication Record Sheet (PNPP No. 8264).
3. Use formal forms specified by the EPIs or other plant procedures/instructions to record information and document actions taken.
4. Complete required forms fully and ensure that required sign-offs for reviews and approvals are obtained.
5. Thoroughly document justification for deviating from approved plant procedures and instructions.
6. Retain completed forms, logs and Communication Record Sheets until collected per Section 5.2.

5.2 Record Collection and Retention

Upon termination of the event, deactivation of an emergency facility, or relief turnover of facility personnel, Emergency Plan-related records shall be collected, reviewed and retained in accordance with the guidance provided below.

5.2.1 Control Room Shift Supervisor:

1. Collect all emergency forms and other materials generated by the Control Room staff and the SAS Operators, ensuring inclusion of a Transaction Confirmation Report from the CRA Office telecopier.
 - If the OSC was activated without the TSC, direct the OSC Coordinator to collect, review and deliver any OSC records of the event to the Control Room.
2. Review these records to ensure they are accurately and thoroughly completed.
3. Turnover these records to the Control Room Assistant (CRA) for holding until picked up by EPU or a TSC staff member.

Under no circumstances shall original records be allowed to leave the CRA Office, or copies made of originals until EPU has reviewed records and returned a copy of records to the CRA Office per Section 5.2.5.
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5.2.2 OSC Coordinator:

1. Collect all emergency forms and other materials, with the exception of Health Physics surveys, generated by the OSC staff.
2. Review these records to ensure they are accurately and thoroughly completed.
3. Deliver and turnover these records to the TSC Administrative Assistant or Control Room Shift Supervisor if the TSC was not activated.

5.2.3 EOF Manager:

1. Collect all emergency forms and other materials generated by the EOF staff and Radiation Monitoring Team (RMT) personnel, ensuring inclusion of a telecopier Transaction Confirmation Report.
2. Review these records to ensure they are accurately and thoroughly completed.
3. Deliver and turnover these records to the TSC Administrative Assistant.

5.2.4 TSC Administrative Assistant:

1. Collect all emergency forms and other materials generated by the TSC staff, including RMT personnel if the EOF was not activated, ensuring inclusion of a telecopier Transaction Confirmation Report.

2. Direct support staff to pickup Emergency Plan-related records generated by the Control Room staff and SAS at the CRA Office.
3. Ensure that records generated by the OSC staff are delivered to the TSC upon OSC deactivation.
 - If the OSC is to remain operational after the TSC is deactivated, instruct the OSC Coordinator to deliver OSC records to the Control Room Shift Supervisor once the OSC is deactivated.
4. Turnover the records collected to the EPU Representative in the TSC for final review and disposition.
 - If an EPU Representative is not present in the TSC, lock all collected records in the "E-Plan Emergency Records" file drawer in the TSC Records Room.

NOTE: A key for this file drawer is kept on the TSC Master Door Key in the E-Plan keybox located outside the TSC Records Room.

5.2.5 On-Call EPU Representative:

1. Obtain records of the event from the TSC Administrative Assistant, or if the TSC was not activated, the CRA Office.
 - If EPU Representative was not present in the TSC during its deactivation, all records collected and delivered to the Administrative Assistant will be locked in the TSC Records Room "E-Plan Emergency Records" file drawer.
2. Review these records to ensure they are complete with appropriate reviews and/or approvals obtained.
3. Dispose of any copies of original records or other material collected which does not specifically cover event activities and cannot be tied to a certain/ERO position or function.
4. Clearly identify the original records by stamping each sheet with a stamp, entitled "E-Plan Original Record," using red ink only; then initial and date the first (cover) page for forms generated per the EPIs.
5. Generate two copies of stamped original records; retain one copy for EPU event files and deliver the second copy to the CRA Office.
6. Deliver original stamped records to the EPU designated Records Management Support Team (RMST) member(s) for final disposition per <PAP-1701>.

-- If the event terminates during weekend or off-hours, keep original records locked in TSC Records Room file drawer until the next working day when transfer to the EPU designated RMST member can occur.

7. Ensure that the Event Closeout Summary, generated and distributed by EPU per <EPI-B1>, and any records generated by the Recovery Organization per <EPI-A10> are reviewed and handled for disposition in accordance with Steps 2 thru 6 above.

5.2.6 Control Room Assistant (CRA):

1. Reproduce and issue additional copies of copy stamped "E-Plan Original Record," provided by EPU, to plant personnel, NRC, etc., who require information on Emergency Plan event activities.

5.2.7 RMST Member, EPU:

1. Log receipt of records per <PAP-1701> ensuring that the number of pages received is listed for each type of record received.
2. Store the master original in an appropriate one-hour fire-rated cabinet until transferred to the Records Management Unit (RMU).
3. Forward any record original, contained in the Emergency Record Package and not specified in the EPIs, to the appropriate Unit/Section per <PAP-1701>.
4. Duplicate and transmit other types or records as directed by the Onsite Emergency Planning Coordinator.

REQUIRED ERO LOGS

A. Operations Support Center (OSC):

1. OSC Coordinator (facility log)

- Refer to Attachment 4 for details on required log entries.

B. Technical Support Center (TSC):

1. Operations Manager (facility log)

- Refer to Attachment 5 for details on required log entries.

2. Operations Advisor

3. Plant Technical Engineer

4. Maintenance Coordinator

5. Radiation Protection Coordinator

6. Security Coordinator

7. NRC ENS and "5-Way" Circuit Communicators

8. RMT Communicator

C. Emergency Operations Facility (EOF):

1. Emergency Coordinator (facility log)

- Refer to Attachment 6 for details on required log entries.

2. Plant Operations Advisor

3. Offsite Radiation Advisor

4. NRC ENS and "5-Way" Circuit Communicators

5. RMT Communicator

EMERGENCY LOG/DATA SHEET

PNPP No. 7650 Rev. 9/17/03

EPI-B9

[illegible]

* Date is only required on initial entry on each page or one per day at 0001.

COMMUNICATION RECORD SHEET

PNPP No. 8264 Rev. 10/93

EPI-B1

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(Name of Requestor) (Position/Title/Location)

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SUBJECT: _____

QUESTION/TASK: _____

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RESPONSE: _____

RESPONSE PREPARED BY: _____ at ____/____/____

(Name)

(Date)

(Time)

RESPONSE DELIVERED TO: _____ at ____/____/____

(Name)

(Date)

(Time)

SUGGESTED OSC COORDINATOR'S LOG GUIDELINES

- Arrival times of OSC staff personnel; i.e., OSC Coordinator, supervisors, planners, etc.
- Callouts made for additional staff; i.e., discipline and number.
- Time OSC declared operational, and staffing at the time of this decision.
- Relocation of Operations Foreman and PPOs to the OSC, including departure of Operations Foreman to support fire brigade or other activities.
- Announcements heard over Plant PA and radio in OSC regarding plant status or significant actions; i.e., area evacuations, major equipment malfunctions, etc.
- Requests for OSC support from TSC and/or Control Room.
- In general, a synopsis of key discussions among OSC staff or the TSC/Control Room.

SUGGESTED TSC OPERATIONS MANAGER'S LOG GUIDELINES

- Time TSC assumed duties and responsibilities of the Emergency Coordinator from the Shift Supervisor.
- Time EOF assumed duties and responsibilities of the Emergency Coordinator from the Operations Manager, if applicable.
- Arrival times of key TSC staff personnel; i.e., Operations Manager, etc.
- Callouts made for additional staff; i.e., discipline and number.
- Time TSC declared operational, and staffing at the time of this decision.
- Announcements heard over Plant PA interfacility PA, and radio in TSC regarding plant status or significant actions; i.e., area evacuations, Security events, major equipment malfunctions, etc.
- TSC task priorities established and/or revised by Operations Manager.
- Time of TSC/OSC staff briefings performed by Operations Manager.
- Time of approval and implementation of onsite protective actions as necessary.
- Decision to issue potassium iodide (KI) to plant personnel, and RMT personnel prior to EOF operation.
- Approval and time of implementation for offsite protective actions recommendations for the general public prior to EOF operation.
- Implementation of accountability of onsite personnel through Security Coordinator.
- Time of notification that State and/or County Liaisons have been dispatched to the Perry Plant.
- Time of notification that NRC Regional Site Team dispatched to the Perry Plant.
- Communications with Federal, State and local County agencies/officials other than formal notifications.

SUGGESTED EOF EMERGENCY COORDINATOR'S LOG GUIDELINES

- Time EOF assumed responsibilities for offsite notifications, dose assessment activities, and event classification from the TSC Operations Manager.
- Arrival times of key EOF staff personnel; i.e., Emergency Coordinator, etc.
- Callouts made for additional staff; i.e., discipline and number.
- Time EOF declared operational, and staffing at the time of this decision.
- Time of EOF staff briefings performed by Emergency Coordinator or other staff members.
- Announcements heard over Plant PA and interfacility PA, radio in EOF regarding plant status or significant actions; i.e., major equipment malfunctions, plant evolutions/actions, etc.
- Decisions made by Emergency Coordinator affecting EOF staff or other EOR response to event.
- Time of approval and implementation of offsite protective actions for the general public, noting discrepancies between utility and State recommendations.
- Approval of the use of potassium iodide (KI) for decision to issue potassium iodide (KI) to EOF staff and RMT personnel.
- Time notified of NRC Regional Site Team response to the Perry Plant.
- Time notified of State and/or local County Liaisons being dispatched to the Perry Plant.
- Communications with Federal, State and local County agencies/officials other than formal notifications.