

**Constellation
Energy Group**

Nine Mile Point
Nuclear Station

January 12, 2004

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

RE: Nine Mile Point Unit 1
 Docket No. 50-220
 DPR-63

 Nine Mile Point Unit 2
 Docket No. 50-410
 NPF-69

Gentlemen:

Enclosed please find a copy of the following procedure revision for Nine Mile Point Nuclear Station:

 NIP-EPP-01 Rev 15 Emergency Response Organization Expectations and Responsibilities

This procedure revision is being submitted as required by Section V to Appendix E of 10 CFR Part 50. Should you have any questions, please feel free to contact Mr. James D. Jones, Director of Emergency Preparedness at (315) 349-4486.

Very truly yours,

A handwritten signature in black ink, appearing to read "Gary L. Detter".

Gary L. Detter
Manager Security & Emergency Preparedness

GLD/cr

Enclosure

pc: Mr. H.J. Miller, Regional Administrator, Region I (1 copy)
 Mr. G.K. Hunegs, Senior Resident Inspector (1 copy)
 Mr. P.S. Tam, Senior Project Manager, NRR (2 copies)

A045

NINE MILE POINT NUCLEAR STATION

NUCLEAR INTERFACE PROCEDURE

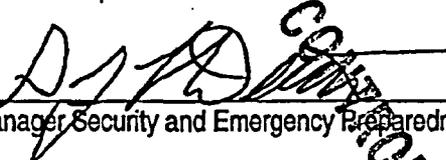
NIP-EPP-01

REVISION 15

EMERGENCY RESPONSE ORGANIZATION EXPECTATIONS AND RESPONSIBILITIES

TECHNICAL SPECIFICATION REQUIRED

Approved by:
G. L. Detter



Manager Security and Emergency Preparedness

12/15/03
Date

Effective Date: 12/19/2003

PERIODIC REVIEW DUE DATE: JUNE 2004

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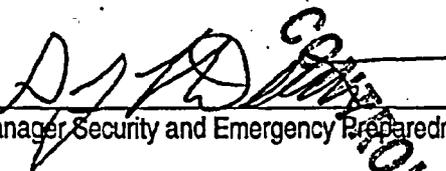
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.1.0 PURPOSE

To describe the composition, structure, expectations and maintenance of the Emergency Response Organization (ERO).

2.0 PRIMARY RESPONSIBILITIES

2.1 Nuclear Division Managers and Supervision

- assign qualified individuals to the ERO,
- assign personnel to perform emergency equipment surveillances and inventories,
- support the training, drill and emergency response functions required to maintain emergency preparedness,
- assist Emergency Preparedness with the oversight and resolution of ERO Performance issues.

2.2 Director - Emergency Preparedness

- maintain the ERO with qualified individuals in sufficient quantity to meet the requirements of the Site Emergency Plan (SEP),
- assure adequate resources to effectively implement the SEP.

2.3 ERO Initial Responders maintain qualifications and meet expectations associated with the position being filled.

2.4 ERO Secondary Responders maintain qualifications and meet expectations associated with the position being filled.

2.5 Other ERO Members respond to the emergency as directed by supervision.

2.6 ERO Selection Committee consists of the Director of Emergency Planning (DEP) and Senior Managers. Committee purpose is to assist the DEP in reviewing ERO composition and selecting replacement personnel.

3.0 PROCEDURE

3.1 ERO Composition, Structure, and Maintenance

3.1.1 The Director of Emergency Preparedness:

- a. Shall ensure that personnel are assigned to staff the ERO in accordance with Attachment 1, "Emergency Response Organization."
- b. Shall maintain the staffing of positions in Attachment 1 using NUREG-0654 Table B-1 as a guide.

3.1.1 (Cont)

- c. Shall, on at least a quarterly basis, generate a training due report, and provide this to Emergency Directors/Recovery Managers, and for secondary responders, the appropriate Managers. The training due report should contain:
 - When each responder is due for training.
 - A summary of any responders currently delinquent.
 - Any responders that will be delinquent prior to the next revision of the training list.
- d. Shall maintain a notification system for all responders.

3.2 **ERO Qualification and Expectations**

3.2.1 ERO Responders shall become qualified and maintain qualifications in accordance with NTP-TQS-202, Emergency Preparedness Training.

3.2.2 During drills, exercises and actual events, ERO responders shall demonstrate the ERO Personal Performance Standards (as appropriate) detailed in Attachment 4.

3.2.3 ERO Initial and Secondary Responders should:

- a. Comply with Fitness for Duty requirements when responding to emergencies, in accordance with NIP-FFD-01. This shall be accomplished by:
 - 1. Persons in on-call ERO positions shall limit consumption of alcohol during their duty week, such that they maintain a blood alcohol level of less than 0.04% BAC.
 - 2. All responders shall report consumption of alcohol to Security personnel or their emergency facility lead, if consumed within five hours of the emergency call-out.
 - 3. Responders who are not fit for duty should not respond.
- b. Report to their designated emergency response facility when notified of an emergency, in accordance with Step 3.4.

NOTE: ERO Responders should respond to an emergency, if notified, regardless of what team is on duty.
- c. Report for all training, drills, and associated activities (such as briefings or critiques) when notified to do so, unless other arrangements have been made in accordance with 3.2.4
- d. Respond to notification drills by completing Attachment 3, Notification Drill Response Form, from EPMP-EPP-06.
- e. Report any changes in home telephone numbers to Emergency Preparedness.

3.2.3 (Cont)

- f. Observe and evaluate during their "on-deck" week for the duty team during scheduled drills and exercises as designated, unless other arrangements have been made in accordance with 3.2.4.
- g. Clerical personnel shall report to the EOF upon notification of an emergency.

3.2.4 Initial and secondary responders shall arrange for qualified relief if they are not available for any reason during their duty week, or as required in Steps 3.2.3.c and 3.2.3.d of this procedure.

- a. Personnel who arrange for relief should inform the appropriate facility leader:

- EOF : Emergency Director/Recovery Manager
- TSC : TSC Manager
- OSC : OSC Coordinator
- JNC : JNC Director

3.2.5 ERO Initial Responders should inform their supervisor or facility lead of the inability to perform their ERO duty due to long-term absence or job change.

3.2.6 ERO Secondary Responders should inform their immediate supervisor of the inability to perform their ERO duties due to absence or job change.

3.3 ERO Maintenance

3.3.1 Managers and Supervisors should complete "Attachment 2" for any changes to initial and secondary responders and forward to Emergency Preparedness. This includes telephone number changes, qualification lapses, job change or termination.

3.3.2 ERO Selection Committee

- a. The DEP should maintain the ERO selection committee to consist of:
 - DEP (chairperson)
 - Operations Managers (for TSC staff)
 - Engineering Manager (for TSC staff)
 - Maintenance Manager (for OSC staff)
 - Work Control/Outage Management Manager (for OSC staff)
 - Training Manager (for EOF staff)
 - Director of Communication/Public Relations (for JNC staff)

3.3.2 (Cont)

b/

DEP should:

1. Assess the organization for qualified ERO replacements using Attachment 3 as a guide.
2. Provide ERO selection committee with suggested replacements
3. When committee finalizes recommendation for replacements, communicate decision to candidates supervisor/manager.

c. The DEP should ensure:

1. the committee meets a minimum of once per year and
 - a. reviews the ERO against Attachment 3 "ERO Position Prerequisite Matrix"
 - b. removes or assigns personnel as needed to maintain a fully staffed ERO that is compliant with Attachment 3
2. ERO vacancies are
 - a. assessed by the Committee
 - b. replacements are designated in accordance with Attachment 3
 - c. designees are placed on the duty roster within
 - 60 days after the creation of the vacancy
 - 10 days after satisfactory completion of the most recent site drill

d. The ERO Selection Committee shall participate in the above activities

3.3.3 Nuclear Division supervisors and managers should assess impact of the loss of any ERO member due to illness, leaving the company, etc., and inform the Director of Emergency Preparedness as necessary.

3.3.4 Managers and Supervisors shall assist EP in maintaining the notification database when requested.

3.4 **ERO Response Time**

3.4.1 ERO Initial and Secondary Responders should report to their designated emergency response facility:

- a. Within 30 minutes of being notified during normal work hours for the TSC and OSC.
- b. Within 60 minutes of being notified during normal work hours for the EOF and JNC.
- c. Within 60 minutes of being notified during off-hours for all emergency response facilities.

3.5 ERO Continuous Improvement Program

3.5.1 Ownership of the ERO composition and performance is as follows:

Facility	ERF Lead	Responsible ERO Performance	ERF Mission Owner
JNC	JNC Director	JNC Directors, JNC staff, DEP	Director-Communications and Public Affairs
EOF	Emergency Director	Emergency Directors, EOF staff, DEP	Director Emergency Preparedness
OSC	OSC Coordinator	OSC Directors, OSC staff, DEP	Maintenance Manager
TSC	TSC Manager	TSC Directors, TSC staff, DEP	Operations and Engineering Managers

3.5.2 Continuous improvement actions should be implemented as follows:

- a. EP shall initiate and provide guidance for all activities associated with the initiatives detailed below.
- b. Emergency Preparedness (EP) shall:
 1. Develop summaries of drills/exercises, actual events and Operating Experience issues that contain strengths, opportunities, good practices and applicable ERO positions/Emergency Response Facility (ERF). These will be referred to an EP Event Reports.
 2. Distribute EP Event Reports to the ERO
 3. Initiate and facilitate to completion, the activities in Steps 3.5.2.b-d.
- c. Performance issues should be handled as follows:

Prior to drill/exercise

1. ERF leads who will be playing in the evolution should, when prompted by EP:
 - a. Assemble their teams two or three weeks prior to the drill
 - b. Review expectations and performance standards
 - c. Review pertinent drill/exercise and event performance issues, corrective actions and good practices, as provided by EP.

After a drill/exercise or actual event

1. All ERO members should review the EP Event Reports for applicable issues
2. ERF Facility leads who participated in the evolution should, when prompted by EP:
 - a. Participate in the development and execution of corrective actions
 - b. As needed, relate useful findings to the ERO
 - c. Initiate requests to EP for additional proficiency enhancing evolutions, as needed
 - d. Seek assistance from ERF mission owners and EP for major performance issues

3.5.2 (Cont)

- d. ERF Leads and ERF Mission owners shall:
 1. Review EP Event Reports for applicable issues.
 2. Assist ERO Performance owners in the resolution of issues and the maintenance of good practices, when requested.
- e. Managers and supervisors should:
 1. Maintain awareness of their responsible ERO performance through review of EP Event Reports.
 2. Support resolution of ERO performance issues as needed and requested.

4.0 DEFINITIONS

4.1 Emergency Response Organization (ERO) Member

Any person having designated emergency response duties in one of the Emergency Response Facilities. This may include, but is not limited to:

- ERO Initial and Secondary Responders
- Operators/Operations Department Personnel
- Mechanical Maintenance Personnel
- Electrical Maintenance Personnel
- Instrument and Calibration Technicians
- Radiation Protection Technicians
- Staff as assigned by individual supervisors
- Security Personnel actively assigned shift functions

Staff assigned to each of the above departments may not be considered ERO members unless they are specifically assigned. Other personnel are considered Non-Essential.

4.2 Initial Responder. An individual assigned to fill a key position designated in the ERO per Attachment 1.

4.3 Secondary Responder. An individual who supports an initial responder in the emergency preparedness program per Attachment 1.

4.4 Facility Lead. The functional leader of an emergency response facility.

5.0 REFERENCES AND COMMITMENTS

5.1 Licensee Documentation

None

5.2 Standards, Regulations, and Codes

5.2.1 10CFR50 Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

5.2.2 NUREG-0654, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants

5.2.3 NUREG-0696, Functional Criteria for Emergency Response Facilities

5.3 Policies, Programs, and Procedures

5.3.1 Site Emergency Plan

5.3.2 NDD-EPP, Emergency Preparedness

5.4 Commitments

None

6.0 RECORDS REVIEW AND DISPOSITION

6.1 The following records generated by this procedure shall be maintained by Records Management for the Permanent Plant File in accordance with NIP-RMG-01, Records Management:

None

6.2 The following records generated by this procedure are not required for retention in the Permanent Plant File:

- Attachment 2, ERO Change Form

LAST PAGE

ATTACHMENT 1: EMERGENCY RESPONSE ORGANIZATION

Sheet 1 of 4

CONTROL ROOM ORGANIZATION (Typical)⁽⁴⁾	
<i>Title/Position</i>	<i>Secondary Responder</i>
Station Shift Supervisor (SSS) who is the Emergency Director (ED)	NONE in the Control Room
Assistant SSS (ASSS) ¹	
Shift Technical Advisor (STA)	
Chief Shift Operator (CSO)	
Nuclear Operator "E"	
Nuclear Auxiliary Operator "B" or "C" (minimum of 2) ²	
Chemistry Technician	
Fire Brigade (minimum of 2)	
Radiation Protection Tech. ³	
Communications Aide	

¹ ASSS may also fulfill STA function if qualified.

² Can perform basic mechanical and electrical maintenance functions.

³ Additional RP Tech available from unaffected unit.

⁴ Operating Shift complement is contained in GAP-OPS-01.

ATTACHMENT 1 (Cont)

Sheet 2 of 4

EMERGENCY OPERATIONS FACILITY (EOF)

<i>Initial Responder</i>	<i>Secondary Responder</i>
Emergency Director (1)	None
Off-Site Dose Assessment Manager (ODAM) (1)	Environmental Survey Sample Team Coordinator (1)
	Dose Assessment Staff (1)
	Rad Pro Tech (1)
Administrative Logistics Manager (1)	Clerical Staff (14) (for all facilities)
Technical Liaison Advisory Manager (1)	None
EOF Administrator (1)	Tech Staff (1/Unit)
	EOF Communicator (1/Unit)
	Plant Information Coordinator (1)
	County Liaison (1)
	State Liaison (1) (Staffed by unaffected Unit EOF Communicator)
Communications Coordinator (1)	None
EOF/JNC Liaison (1)	None

Minimum number of responders are noted in parenthesis.

ATTACHMENT 1 (Cont)

Sheet 3 of 4

TECHNICAL SUPPORT CENTER (TSC) ORGANIZATION	
Initial Responder	Secondary Responder
TSC Manager (TSCM) (1)	None
Technical Data Coordinator (min 2)	Technical Staff (minimum of 4)
	Emergency Notification System (ENS) Communicator (min of 1)
	TSC Communicator (min of 1 per Unit)
	Control Room Communicator (min 1 per Unit)
Reactor Analyst (1)	None
Maintenance Coordinator (1)	None
Radiological Assessment Manager (RAM) (1)	Rad Support Staff (as needed)
	Health Physics Network (HPN) Communicator (min of 1)
	Chemistry Technician or On-Call Chemistry Supervisor (minimum of 1)
Security Liaison (1)	None
Nuclear Engineering & Design (NED) Coordinator (1)	(NED) Engineering Staff: Mechanical (min of 1) Electrical (min of 1) Nuclear Fuel (min of 1)

Minimum number of responders are noted in parenthesis

ATTACHMENT 1 (Cont)

Sheet 4 of 4

OPERATIONS SUPPORT CENTER (OSC) ORGANIZATION

<i>Initial Responder</i>	<i>Secondary Responder</i>
OSC Coordinator (1)	None
OSC Communicator (1)	None
Radiation Protection Team Coordinator (1)	Radiation Protection Technician: Downwind Survey Teams (minimum of 6 technicians) In-Plant Survey Teams (minimum of 3 technicians) Damage Control Team Support (minimum of 3 technicians)
Damage Control Team Coordinator	Damage Control Teams Mechanical (minimum of 3) Electrical (minimum of 3) Instrument & Control (minimum of 3)
	Fire Brigade (per Site requirements)
⁴ Personnel Accountability Coordinator	None

Minimum number of responders as noted in parenthesis.

⁴May report to the Security Tactical Operations Center (STOC)

JOINT NEWS CENTER (JNC) ORGANIZATION

<i>Initial Responder</i>	<i>Secondary Responder</i>
JNC Director (1)	JNC Radiological Briefer (minimum 1)
	JNC Technical Briefer (minimum 1)
	JNC Admin Manager (1)
	JNC Writer (1)
Rumor Control Coordinator (1)	Rumor Control/Media Response (minimum 2)
	Media Monitoring (minimum 1)
JNC Spokesperson (1)	None

Minimum number of responders as noted in parenthesis.

ATTACHMENT 2: ERO CHANGE REQUEST

Name of affected person: _____ Work ext: _____

Affected ERO Position: _____ Unit 1 Unit 2
N/A

Description of Change: (Add Delete Change) Description/Reason:

If addition: Home Phone: _____ Pager #: _____ or doesn't have one yet or
 N/A

This form completed by:

Name (print/initial/date): _____ Work ext: _____

Approved (Branch Manager or above): (print/initial/date): _____

Fax completed form to EP at # 4874

Emergency Preparedness use only

Approve Reject

Reason:

Completed by: Name (print/initial/date) _____

Initiate ERO changes in accordance with EPMP-EPP-06

ATTACHMENT 3: ERO POSITION PREREQUISITE MATRIX

ERF	ERO Position Title	Prerequisites, skill, certifications	Typical Designate/Department
EOF	Emergency Director	General plant knowledge, command/control skills	Senior manager
	Offsite Dose Assessment Mgr	Health physics or chemistry background	Chemistry Mgrs, Analysis Engineers
	Environmental Survey Sample Team Coord	Technical background	Environmental, Chemistry
	Dose Assessment Staff	Health physics or chemistry background	Chemistry, Analysis Engineers
	Rad Protection Tech	RP Tech qualification	RP
	Admin Logistics Manager	Admin or Technical background	Any
	Clerical Staff	Plant Operating Clerk, Admin Personnel	Any
	Technical Liaison Advisory Manager	Engineering Management	Engineering General Mgr or Principle Engineer
	EOF Administrator	General plant knowledge	Training
	EOF Tech Staff	SRO Cert or license (past or current)	Training (Ops)
	EOF Communicator	General plant knowledge	Training (Ops)
	Plant Info Coordinator	Technical or Admin background	Training
	County Liaison	General plant knowledge	Training
	Communications Coordinator	Technical or Admin background	Q & PA
EOF/JNC Liaison	Admin background	Any	
TSC	TSC Manager	Detailed plant-specific knowledge and command/control skills	Ops Mgr and Ops GSO
	Technical Data Coordinator	Detailed plant-specific knowledge	Ops or System Engineering
	TSC Technical Staff	SRO Cert or license (past or current), or detailed plant specific knowledge	Ops or System Engineering
	ENS Communicator	Technical background	System Engineering
	TSC Communicator	General plant knowledge	Ops or System Engineering
	Control Room Communicator	Detailed plant-specific knowledge, SRO Cert or License (past or current)	Ops Support (Super and Specialists)
	Reactor Analyst	Reactor Engineer	Reactor Engineering

ATTACHMENT 3 (Cont)

ERF	ERO Position Title	Prerequisites, skill, certifications	Typical Designate/Department
TSC (Cont)	Maintenance Coordinator	Maintenance Management	Maintenance General Supervisors
	Radiological Assessment Mgr	Rad. Prot. Management	RP Manager, Supers
	Rad Support Staff	Rad. Prot. background	Rad. Prot.
	HPN Communicator	Technical background	Rad Pro
	Chemistry Dept Tech or Supervisor	Chemistry background	NA
	Security Liaison	Security Management	Security Dept Mgrs/Supers
	NED Coordinator	Engineering Management	Engineering
	Engineering staff	Engineering staff	Engineering
OSC	OSC Coordinator	Maintenance Management	Maintenance
	OSC Communicator	Maintenance or WC/OM Management	Maintenance or WC/OM
	Rad Protection Team Coord	Rad. Prot. Management	Rad Pro
	RP Techs	NA	NA
	Damage Control Team Coord	Maintenance or WC/OM Management	Maintenance or WC/OM
	Personnel Accountability Coord	Security Management	Security
	Fire Brigade	Fire Prot. background	Fire Protection
JNC	JNC Director	Department Manager, Comm & Public Affairs	Any
	Rad Briefer	RP background	Any
	Tech Briefer	Detailed plant-specific knowledge	Ops Training
	Admin Manager	Management	Any
	Writer	Management	Licensing
	Rumor Control Coord	Management	Any
	Media Response	Management	Any
	Rumor Control	Management	Any
Spokesperson	Technical background	Any	

ATTACHMENT 4: ERO PERSONNEL PERFORMANCE STANDARDS

ID	Standard	Description
EVT	Timely and Accurate Event Recognition	Recognizes normal and off normal parameter values, trends. Collects relevant data using multiple indications to validate plausible events. Solicits input from crew and station workforce. Compares plant conditions with staff knowledge and experience and develops correct diagnosis of event.
MON	Critical Parameters and events Monitored and Trended	Demonstrates understanding of system status during transients and emergency conditions. Demonstrates recognition of expected and unexpected system changes. Demonstrates understanding of system operation including setpoints, interlocks and automatic actions. Demonstrates understanding of how systems and components interact. Demonstrates understanding of how actions should affect system operation
PRO	Appropriate Procedures Referenced and Utilized	Refers to correct procedures as required and without delay. Follows procedure steps in correct sequence. Abides by cautions and limitations. Procedure steps are completed as written. Utilizes approved methods of place keeping. Reviews procedures (as individual and with crew when crew participation required) prior to use when possible. Procedure changes are identified and supported when required. Activities are stopped, the plant is stabilized and supervision is contacted when problems arise.
SAF	Applies safety principles to all activities	Use and enforces site safety procedures and practices when planning and performing work. Adheres to ALARA. Stops unsafe work practices. Utilizes the Hazardous Energy Control Program effectively. Maintains and enforces housekeeping standards.
MIT	Develops timely and appropriate mitigate and corrective action strategies	Assesses and actively seeks all available information to understand plant and radiological conditions. Determine need for action strategies. Considers all inputs for possible solutions, including innovation as required. Requests or plans for devised actions without delay. Assesses effectiveness of these plans and actions and adjusts strategies as needed.
COM	Communications Comply with the Established Standard	Communications and the phonetic alphabet are strictly practiced. All communications are clear and concise. Listens actively and checks for understanding. Requests for clarification are made when necessary. Log keeping practices allow for accurate event recreation.
CNC	Command and control behaviors consistently used	Makes conservative decisions. Sets priorities consistent with plant and offsite conditions, and available resources. Delegates responsibilities considering roles, levels of experience and workload. Provides updates when ERF staff needs timely information to carry out responsibilities. Conducts briefs when needed to ensure that staff remains aware of and focused on their goals. Evaluates plant response to crew's actions. Reinforces good behavior.
INF	Communicate Vital Information	Provides relevant and timely information; both solicited and unsolicited. Provides relevant and timely notification and recommendations when parameters, parameter trends and system availability require action or change significantly. Advocates conservative decision making. Questions priorities inconsistent with ERF goals and provides solutions. Informs ERF leadership if assigned tasks are beyond current capabilities and provides solutions. Provides unsolicited feedback on status of actions being taken. Holds self and crewmembers accountable to established standards of performance. Provides coaching when needed.
CAL	Calculations and engineering analysis are accurate and timely	Performs calculation and analysis tasks methodically and accurately. Performs appropriate verification of inputs and results.
OFF	Recognition and action towards the needs of offsite agencies	Advocates offsite agency needs and priorities within the ERO. Incorporates offsite agency requirements and requests into actions. Resolves issues related to offsite agency needs without delay.