

Nebraska Public Power District

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NLS2004013

February 13, 2004

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555-0001

Subject: Emergency Plan Implementing Procedure Cooper Nuclear Station, NRC Docket 50-298, DPR-46

The purpose of this letter is to transmit the following Emergency Plan Implementing Procedure (EPIP) pursuant to the requirements of 10 CFR 50, Appendix E, Section V, "Implementing Procedures":

EPIP 5.7.2 Revision 19 "Shift Supervisor EPIP"

Should you have any questions concerning this matter, please contact me at 402-825-2774.

Sincerely, Paul V. Fleming

Licensing and Regulatory Affairs Manager

/jr

Enclosure

cc: Regional Administrator w/enclosures (2) USNRC - Region IV

Senior Resident Inspector w/enclosures USNRC NPG Distribution w/o enclosures

Records w/o enclosures

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#### ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©

#### Correspondence Number: NLS2004013

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The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only and are not regulatory commitments. Please notify the Licensing & Regulatory Affairs Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
NONE	

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	CNS OPERATIONS MANUAL EPIP PROCEDURE 5.7.2		USE: REFERENCE EFFECTIVE: 1/19/04 APPROVAL: SORC/IQA
	SHIFT SUPERVISOR EPIP		OWNER: R. J. FISCHER DEPARTMENT: EP
1. 2. 3. 4. 5.	PRECAUTIONS AN REQUIREMENTS . INITIAL ACTIONS	ACTIONS FOR AN ALERT ACTIONS FOR SITE AREA EN ACTIONS FOR GENERAL EN SHIFT MANAGER ACTIONS INDIVIDUAL IS EMERGENC	1 1 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2

#### 1. PURPOSE

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This procedure provides a series of actions to be taken by Shift Manager upon declaration of an Emergency Classification.

#### 2. PRECAUTIONS AND LIMITATIONS

- [ ] 2.1 Shift Manager shall initially assume role of Emergency Director and will be Emergency Director until relieved by another qualified Emergency Director.
  - [] 2.2 If an Alert, a Site Area Emergency, or General Emergency is reached, do not reclassify to a lower classification or terminate Emergency until Emergency Response Facilities are activated.
  - [] 2.3 If the emergency is security-related, armed Security personnel may not be available to perform functions described in this procedure. Other personnel should be assigned to perform these functions.©
  - 3. **REQUIREMENTS**
  - [] 3.1 An Emergency has been declared per Procedure 5.7.1.
  - [] 3.2 Procedure steps in Section 4 and Attachments 1, 2, 3, and 4 may be performed out of listed order, if needed to more efficiently deal with emergency situation.

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4. INITIAL ACTIONS

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[]	4.1		anager, immediately following classification of an emergency, should se following to Control Room Staff:			
	[]	4.1.1	Time of classification.	Time:		
	[]	4.1.2	Level of emergency classification.	Class:		
	[]	4.1.3	EAL on which classification is based.	EAL#:		
	[]	4.1.4	Description of condition causing classification.			
[]	4.2	Ensure	Shift Communicator has been called to Control Room.			
[]	4.3	Enter A	ttachment for applicable Classification Level.			
	[]	4.3.1	Attachment 1, ACTIONS FOR NOTIFICATION OF UNUSUAL EVENT.			
	[]	4.3.2	Attachment 2, ACTIONS FOR AN ALERT.			
	[]	4.3.3	Attachment 3, ACTIONS FOR SITE AREA EMER	GENCY.		
	[]	4.3.4	Attachment 4, ACTIONS FOR GENERAL EMERG	ENCY.		
5.	RECO	ORDS				

[] 5.1 Completed portions and Attachments are sent to the EP Manager for CNS Records (quality records upon completion).

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#### 1. ACTIONS FOR NOTIFICATION OF UNUSUAL EVENT

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- [] 1.1 Inform ERO personnel of Notification of Unusual Event via CNS Automated Notification System (ANS).
  - [] 1.1.1 On telephone with ANS Activation Module, activate ANS by:
    - [] 1.1.1.1 Picking up telephone.
    - [] <u>NOTE</u> Hanging up phone while ANS is activating may cause ANS to lockup.
    - [] 1.1.1.2 When dial tone received, depress ACTIVATE DIALOGICS pushbutton.
    - [] 1.1.1.3 When voice asks for Scenario Password, depress one of following:
      - [] a. "100 SCENARIO" pushbutton for normal NOUE.
      - [] b. "222 SCENARIO" pushbutton to activate on-site ERFs.
      - [] c. "333 SCENARIO" pushbutton to activate AEOF.
    - [] 1.1.1.4 When ANS tells you goodby, hang up.
  - [] 1.1.2 If ANS or telephone with ANS Activation Module is unavailable, have an individual **concurrently** activate backup notification methods per Attachment 6.
- [] <u>NOTE 1 Accountability and personnel assembly is not required at NOUE level;</u> however, it may be performed.
- [] <u>NOTE 2 Accountability should not be performed if performing accountability will</u> additionally THREATEN PERSONNEL SAFETY.<sup>©</sup>
- [] 1.2 Determine if personnel assembly and accountability will be performed.
  - [] 1.2.1 If accountability will <u>not</u> be performed, go to Step 1.3.
  - [] 1.2.2 If accountability will be performed, go to Step 1.4.

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- [] <u>NOTE</u> Personnel assembly and accountability is <u>not</u> required at NOUE level; however, it may be performed.
- [] 1.3 If personnel assembly and accountability will <u>not</u> be performed, perform following:
  - [] 1.3.1 If desired, fill in blanks of Step 1.3.3:
    - [] 1.3.1.1 In (1), give a brief description of emergency event and if applicable, location.
    - [] 1.3.1.2 In (2), provide following as needed:<sup>©</sup>
      - Locations that should be avoided due to emergency conditions.
      - Include specific evacuation routes to ensure personnel are directed around areas involving significant personnel.
      - Any precautions needed for security events/severe weather conditions.
  - [] 1.3.2 Activate Emergency Alarm for 10 seconds.
  - [] 1.3.3 Make following announcement over station Gaitronics:

Attention All Station Personnel, at _	Emergency Director declared
	[time]
a Notification of Unusual Event.	

There is <sup>(1)</sup>

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All personnel stay clear of <sup>(2)</sup>

Activate Emergency Alarm for 10 seconds and repeat announcement.

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- [] <u>NOTE</u> Accountability should <u>not</u> be performed, if performing accountability will additionally THREATEN PERSONNEL SAFETY.<sup>©</sup>
- [] 1.4 If assembly and accountability is desired for NOUE, perform following:
  - [] 1.4.1 If desired, fill in blanks of Step 1.4.3.
    - [] 1.4.1.1 In (1), give a brief description of emergency event and if applicable, location.
    - [] 1.4.1.2 In (2), provide following as needed:<sup>©</sup>
      - Locations that should be avoided due to emergency conditions.
      - Include specific evacuation routes to ensure personnel are directed around areas involving significant personnel.
      - Any precautions needed for security events/severe weather conditions.
  - [] 1.4.2 Activate Emergency Alarm for 10 seconds.
  - [] 1.4.3 Make following announcement over station Gaitronics:

Attention All Station Personnel, at \_\_\_\_\_ Emergency Director declared a [time] Notification of Unusual Event.

There is <sup>(1)</sup>

All personnel report to your Designated Assembly Areas for initial accountability.

All personnel stay clear of <sup>(2)</sup>

Activate Emergency Alarm for 10 seconds and repeat announcement.

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	[]	1.5	Record	time annou	incement completed.	Time:			
I	[]	1.6		on watch in tre 5.7.6.	dividual to complete CNS Notification	n form per			
		[]	1.6.1	For NOU	E, recommended PAR is "None".				
		[]	1.6.2		Review and sign completed Notification form to authorize transmittal to state and local authorities.				
	[]	1.7			nitial notification with PAR, to responsible state and local ental agencies completed within 15 minutes of declaration.				
		[]	1.7.1	Record tir	ne state and local authorities contac	ted. Time:			
	[]	1.8	conditio	ons and re-e are 5.7.1. E	ce of subsequent steps in this Attach evaluate emergency classification as Escalate to a higher emergency classi	conditions change per			
		[]	1.8.1		fication is performed, ensure NRC n mpleted and tracked.	otification 1 hour time			
		[]	1.8.2	If reclassi	fication is performed, proceed to Ste	p 1.11.			
	[]	1.9	after no	e NRC is notified via Emergency Notification System (ENS) immediately notification of responsible state and local governmental agencies, and not han 1 hour after time of declaration of Notification of Unusual Event.					
		[]	1.9.1	Record tir	ne NRC Duty Officer is contacted.	Time:			
	[]	1.10	If asser followir	•	countability is being performed for N	IOUE, perform			
		[]	1.10.1		esignated Assembly Area Supervisor of initial accountability of Operations e 5.7.10.				
		[]	1.10.2	Ensure initial accountability completed within 30 minutes per Procedure 5.7.10.					
			[]	1.10.2.1	Record time initial accountability	completed.			
						Time:			

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- [] 1.11 If escalating to another emergency classification, perform following:
  - [] 1.11.1 Announce following to Control Room Staff:
    - []
       1.11.1.1
       Time of classification.
       Time: \_\_\_\_\_\_
    - [] 1.11.1.2 Level of emergency classification. Class: \_\_\_\_\_
    - [] 1.11.1.3 EAL on which classification is based. EAL #: \_\_\_\_\_
    - [] 1.11.1.4 Description of condition causing classification.
  - [] 1.11.2 Exit this Attachment and enter Attachment for applicable Classification level.
- [] <u>NOTE</u> Normally Shift Manager remains Emergency Director when at a Notification of Unusual Event. However, another qualified Emergency Director may relieve Shift
   [] Manager as Emergency Director.
  - [] 1.12 Turnover Emergency Director duties when relieved by another qualified Emergency Director.
    - [] 1.12.1 Use Attachment 7 to turnover to oncoming Emergency Director.
    - [] 1.12.2 Announce to Control Room who Emergency Director is.
    - [] 1.12.3 Exit this Attachment and enter Attachment 5.

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[]	1.13	Termina	ation of Notification of Unusual Event.	
I	[]	1.13.1	Time of termination.	Time:
I	[]	1.13.2	Announce to Control Room.	Time:
1	[]	1.13.3	Activate All Clear Alarm for 10 seconds.	
Ι	[]	1.13.4	Make following announcement over Station Gaitronics	:
			Attention All Station Personnel, at, the Eme [time] has terminated from the Notification of Unusual Even	
I	[]	1.13.5	Activate All Clear Alarm for 10 seconds and repeat and	nouncement.
I	[]	1.13.6	Record time announcement completed.	Time:
]	[]	1.13.7	Notification of termination to off-site agencies shall be performed within 1 hour after the termination of the emergency.	
	[]	1.13.8	Direct on watch individual to complete CNS Notification Procedure 5.7.6.	on form per
]	[]	1.13.9	Review and sign completed Notification form to author to state and local authorities.	ize transmittal
ļ	[]	1.13.10	Record time state and local authorities contacted.	Time:
	[]	1.13.11	Ensure NRC is notified via Emergency Notification System (ENS) immediately after notification of responsible state and local governmental agencies, and not later than 1 hour after termination.	
l	[]	1.13.12	Record time NRC Duty Officer is contacted.	Time:

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#### 1. ACTIONS FOR AN ALERT

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- [] <u>CAUTION</u> Do <u>not</u> re-activate Automated Notification System if Emergency Response Facilities are already being activated.
- [] 1.1 If <u>not</u> previously performed, initiate ERO activation by:
  - [] 1.1.1 Determine if ERO personnel will report to on-site Facilities or to AEOF.
  - [] 1.1.2 On telephone with ANS Activation Module, activate ANS by:
    - [] 1.1.2.1 Picking up telephone.
    - [] <u>NOTE</u> Hanging up phone while ANS is activating may cause ANS to lockup.
    - [] 1.1.2.2 When dial tone received, depress ACTIVATE DIALOGICS pushbutton.
    - [] 1.1.2.3 When voice asks for Scenario Password, depress one of following:
      - [] a. "222 SCENARIO" pushbutton to activate on-site ERFs.
      - [] b. "333 SCENARIO" pushbutton to activate AEOF.
    - [] 1.1.2.4 When ANS tells you goodby, hang up.
  - [] 1.1.3 If ANS or telephone with ANS Activation Module is unavailable, have an individual concurrently activate backup notification methods per Attachment 6.
- [] <u>NOTE</u> Accountability will be performed if <u>not</u> previously performed and performing accountability will <u>not</u> additionally THREATEN PERSONNEL SAFETY.<sup>©</sup>
- [] 1.2 Determine if personnel assembly and accountability will be performed.
  - [] 1.2.1 If accountability will be performed, go to Step 1.3.
  - [] 1.2.2 If accountability will <u>not</u> be performed, go to Step 1.4.

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[] 1.3 Notify personnel and initiate personnel assembly and accountabil		nd initiate personnel assembly and accountability by:			
[] 1.3.1 If desired, fill in blanks below for Step 1.3.3.			fill in blanks below for Step 1.3.3.		
		[]	1.3.1.1	In (1), give a brief description of emergency event and if applicable, location.	
		[]	1.3.1.2	In (2), provide following as needed:®	
				<ul> <li>Locations that should be avoided due to emergency conditions.</li> <li>Include specific evacuation routes to ensure personnel are directed around areas involving significant personnel safety hazards.</li> <li>Any precautions needed for security events/severe weather conditions.</li> </ul>	
	[]	1.3.2	Activate Emergency Alarm for 10 seconds.		
	[]	1.3.3	Announce following over station Gaitronics:		
			Attention	All Station Personnel, at, Emergency Director [time]	
			declared a		
			There is <sup>(1)</sup>	)	
			<u></u>		
			All person accountab	nel report to your Designated Assembly Areas for initial ility.	
			All person	nel stay clear of <sup>(2)</sup>	
			. <u> </u>		
			<u> </u>		
			Activate E	Emergency Alarm for 10 seconds and repeat announcement.	

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[]	1.4	Notify s	y station personnel <u>WITHOUT</u> personnel assembly and accountability b	
[] 1.4.1 If desired, fill in blanks below for Step 1.4.3.			fill in blanks below for Step 1.4.3.	
		[]	1.4.1.1	In (1), give a brief description of emergency event and if applicable, location.
		[]	1.4.1.2	In (2), provide following as needed:®
				<ul> <li>Locations that should be avoided due to emergency conditions.</li> <li>Include specific evacuation routes to ensure personnel are directed around areas involving significant personnel safety hazards.</li> <li>Any precautions needed for security events/severe weather conditions.</li> </ul>
	[]	1.4.2	Activate E	mergency Alarm for 10 seconds.
	[]	1.4.3	Announce	following over station Gaitronics:
			Attention . declared a	All Station Personnel, at Emergency Director [time] n ALERT.
			There is <sup>(1)</sup>	
			All person	nel stay clear of <sup>(2)</sup>
			Activate E	mergency Alarm for 10 seconds and repeat announcement.

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[]	1.5	Record	time announcement completed.	Time:
[]	1.6		Direct on watch individual to complete CNS Notification form per Procedure 5.7.6.	
	[]	1.6.1	For an ALERT, recommended PAR is "None".	
	[]	1.6.2	Review and sign completed Notification form to auth to state and local authorities.	orize transmittal
[]	1.7	governm	initial notification with PAR to responsible state and nental agencies is completed within 15 minutes of dec ncy class per Procedure 5.7.6.	
	[]	1.7.1	Record time state and local authorities contacted.	Time:
[]	1.8		reviously performed, ensure ERO pager activation has ollowing methods:	s occurred by one
	[]	1.8.1	Activation of Control Room or Shift Manager's pager	, or
	[]	1.8.2	ANS activation by calling Ext. 5560 and verifying Alactive scenario.	NS indicates an
[]	1.9		fails to activate pagers, have an individual <b>concurre</b> notification methods per Attachment 6.	ntly activate
[]	1.10	During performance of subsequent steps in this Attachment, monitor plant conditions and re-evaluate emergency classification as conditions change per Procedure 5.7.1. Escalate to a higher emergency classification if conditions warrant.		
	[]	1.10.1	If reclassification is performed, ensure NRC and ER limits are completed and tracked.	DS 1 hour time
	[]	1.10.2	If reclassification is performed, proceed to Step 1.19.	
[]	1.11		ease is in progress, have a dose calculation performed j are 5.7.17 to determine if a higher classification is war	

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[]	1.12	sure Emergency Response Data Systems (ERDS) is activated using PMIS ART/STOP Menu. This shall be done as soon as possible but not later than nour after time of declaration of an ALERT or higher classification.			
	[]	1.12.1 Record time ERDS activated. Time:			
[]	1.13	sure NRC is notified via Emergency Notification System (ENS) immediately er notification of responsible state and local governmental agencies, and not er than 1 hour after declaration of emergency.			
	[]	1.13.1 Record Time NRC Duty Officer is contacted. Time:			
[]	1.14	Ensure initial accountability of Operations personnel is completed.			
[]	1.15	f any of following conditions exist, <b>concurrently</b> enter Procedure 5.7.14 for Stable Iodine Thyroid Blocking:			
	[]	1.15.1 Fuel cladding has been determined to be lost, or			
[] 1.15.2 Calculated dose of $\geq$ 25 rem (CDE) to thyroid is likely to be re or					
	[]	1.15.3 Life saving operation is to be undertaken in areas where high levels radio-iodine are suspected and no current air analysis is available.			
[]	1.16	Ensure initial accountability completed by:			
	[] 1.16.1 Within 30 minutes, ensure Security Coordinator reports when initia accountability is complete.				
[] 1.16.2 If accountability was <u>not</u> initiated due to personnel safety concern monitor plant/site conditions and when personnel safety concern passed, initiate personnel assembly and accountability.					
	[]	.16.3 Record time initial accountability completed. Time:			
[]	1.17	Consider dismissal of all non-ERO personnel from station at ALERT classification per Procedure 5.7.11.			
[]	1.18	During an ALERT or higher class emergency, perform follow-up notifications to state and local agencies at least every 60 minutes or sooner if there is a significant change in status of emergency per Procedure 5.7.6.			

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- [] 1.19 If reclassifying to another emergency classification, perform following:
  - [] 1.19.1 Announce following to Control Room Staff.
    - []
       1.19.1.1
       Time of classification.
       Time: \_\_\_\_\_\_

       []
       1.19.1.2
       Level of emergency classification.
       Class: \_\_\_\_\_\_
    - [] 1.19.1.3 EAL on which classification is based. EAL: \_\_\_\_\_
    - [] 1.19.1.4 Description of condition causing classification.
  - [] 1.19.2 Exit this Attachment and enter Attachment for applicable Classification level.
- [] 1.20 Turnover Emergency Director duties when relieved by another qualified Emergency Director.
  - [] 1.20.1 Use Attachment 7 to turnover to oncoming Emergency Director.
  - [] 1.20.2 Announce to Control Room Staff who Emergency Director is.
  - [] 1.20.3 Exit this Attachment and enter Attachment 5.

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#### 1. ACTIONS FOR SITE AREA EMERGENCY

- [] <u>CAUTION</u> Do <u>not</u> re-activate Automated Notification System if Emergency Response Facilities are already being activated.
- [] 1.1 If <u>not</u> previously performed, initiate ERO Activation by:
  - [] 1.1.1 Determine if ERO personnel will report to on-site Facilities or to AEOF.
  - [] 1.1.2 On telephone with ANS Activation Module, activate ANS by:
    - [] 1.1.2.1 Picking up telephone.
    - [] <u>NOTE</u> Hanging up phone while ANS is activating may cause ANS to lockup.
    - [] 1.1.2.2 When Dial Tone received, depress ACTIVATE DIALOGICS pushbutton.
    - [] 1.1.2.3 When voice asks for Scenario Password, depress one of following:
      - [] a. "222 SCENARIO" pushbutton to activate on-site ERFs.
      - [] b. "333 SCENARIO" pushbutton to activate AEOF.
    - [] 1.1.2.4 When ANS tells you goodby, hang up.
  - [] 1.1.3 If ANS or telephone with ANS Activation Module is unavailable, have an individual **concurrently** activate backup notification methods per Attachment 6.
- [] <u>NOTE</u> Accountability will be performed if <u>not</u> previously performed and performing accountability will <u>not</u> additionally THREATEN PERSONNEL SAFETY.<sup>©</sup>
- [] 1.2 Determine if personnel assembly and accountability will be performed.
  - [] 1.2.1 If accountability will be performed, go to Step 1.3.
  - [] 1.2.2 If accountability will <u>not</u> be performed, go to Step 1.4.

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- [] 1.3 Notify personnel and initiate personnel assembly and accountability by:
  - [] 1.3.1 If desired, fill in blanks below for Step 1.3.3.
    - [] 1.3.1.1 In (1), give a brief description of emergency event and if applicable, location.
    - [] 1.3.1.2 In (2), provide following as needed:<sup>©</sup>
      - Locations that should be avoided due to emergency conditions.
      - Include specific evacuation routes to ensure personnel are directed around areas involving significant personnel safety hazards.
      - Any precautions needed for security events/severe weather conditions.
  - [] 1.3.2 Activating Emergency Alarm for 10 seconds.
  - [] 1.3.3 Announce following over station Gaitronics:

Attention All Station Personnel, At \_\_\_\_\_ Emergency Director [time] declared a SITE AREA EMERGENCY.

There is <sup>(1)</sup>

All personnel report to your Designated Assembly Areas for initial accountability.

All personnel stay clear of <sup>(2)</sup> \_\_\_\_\_

Activate Emergency Alarm for 10 seconds and repeat announcement.

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[]	1.4	Notify s	station personnel <u>WITHOUT</u> personnel assembly and accountability by:	
	[]	1.4.1	If desired, fill in blanks below for Step 1.4.3.	
		[]	1.4.1.1	In (1), give a brief description of emergency event and if applicable, location.
		[]	1.4.1.2	In (2), provide following as needed:®
				<ul> <li>Locations that should be avoided due to emergency conditions.</li> <li>Include specific evacuation routes to ensure personnel are directed around areas involving significant personnel safety hazards.</li> <li>Any precautions needed for security events/severe weather conditions.</li> </ul>
	[]	1.4.2	Activate E	mergency Alarm for 10 seconds.
	[]	1.4.3	Announce following over station Gaitronics:	
				All Station Personnel, at Emergency Director [time] SITE AREA EMERGENCY.
			There is <sup>(1)</sup>	<u> </u>
			All personnel stay clear of <sup>(2)</sup>	
			Activate E	mergency Alarm for 10 seconds and repeat announcement.
[]	1.5	Record t	time annou	ncement completed. Time:

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- [] 1.6 Make a Protective Action Recommendation (PAR) as part of initial notifications to responsible state and local governmental agencies.
  - [] 1.6.1 If no release in progress, PAR is "None".
  - [] 1.6.2 If release in progress, perform following as needed:
    - [] 1.6.2.1 If dose calculation cannot be completed in time to meet 15 minute notification time limits, perform initial notifications with PAR of "None" and update when dose information needed for a PAR is available.
    - [] 1.6.2.2 Have dose calculation performed per Procedure 5.7.17.
    - [] 1.6.2.3 Use projected doses and Procedure 5.7.20 to make PARs.
- [] 1.7 Direct on watch individual to complete CNS Notification form per Procedure 5.7.6.
  - [] 1.7.1 Review and sign completed Notification form to authorize transmittal to state and local authorities.
- [] 1.8 Ensure initial notification to responsible state and local governmental agencies is completed within 15 minutes of each declaration of an emergency class per Procedure 5.7.6.
  - [] 1.8.1 Record time state and local authorities contacted. Time:
- [] 1.9 If <u>not</u> previously performed, ensure ERO pager activation has occurred by one of the following methods:
  - [] 1.9.1 Activation of Control Room or Shift Manager's pager, or
  - [] 1.9.2 ANS activation by calling Ext. 5560 and verifying ANS indicates an active scenario.
- [] 1.10 If ANS fails to activate pagers, have an individual concurrently activate backup notification methods per Attachment 6.

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- [] 1.11 During performance of subsequent steps in this Attachment, monitor plant conditions and re-evaluate emergency classification as conditions change per Procedure 5.7.1. Escalate to higher classification if conditions warrant.
  - [] 1.11.1 If reclassification is performed, ensure NRC and ERDS 1 hour time limits are completed and tracked.
  - [] 1.11.2 If reclassification is performed, proceed to Step 1.21.
- [] 1.12 If <u>not</u> previously performed, ensure Emergency Response Data Systems (ERDS) is activated using PMIS START/STOP Menu. This shall be done as soon as possible but not later than 1 hour after declaration of an ALERT or higher classification.
  - []
     1.12.1
     Record time ERDS activated.
     Time: \_\_\_\_\_\_
- [] 1.13 If release in progress or suspected, have additional dose calculations performed per Procedure 5.7.17 to determine projected off-site doses for use in determining classification and PAR.
- [] 1.14 Monitor plant conditions and meteorological conditions for changes in PAR.
  - [] 1.14.1 If a change in PAR occurs, complete notifications to responsible state and local governmental agencies within 15 minutes of declaration of the change per Procedure 5.7.6.
  - [] 1.14.2 If a change in PAR occurs, complete notification to NRC immediately after notification of responsible state and local governmental agencies, and not later than 1 hour after declaration of the change per Procedure 5.7.6.
- [] 1.15 Ensure NRC is notified via Emergency Notification System (ENS) immediately after notification of responsible state and local governmental agencies, and not later than 1 hour after declaration of each emergency classification.
  - [] 1.15.1 Record Time NRC Duty Officer is contacted. Time: \_\_\_\_\_
- [] 1.16 If <u>not</u> previously performed, ensure initial accountability of Operations personnel is completed.

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If any of following conditions exist, concurrently enter Procedure 5.7.14 for [] 1.17 Stable Iodine Thyroid Blocking: Fuel cladding has been determined to be lost, or [] 1.17.1[] 1.17.2A calculated dose of  $\geq 25$  rem (CDE) to thyroid is likely to be received, or [] 1.17.3Life saving operation is to be undertaken in areas where high levels of radio-iodine are suspected and no current air analysis is available. If <u>not</u> previously performed, ensure initial accountability completed by: [] 1.18 Within 30 minutes, ensure Security Coordinator reports when initial [] 1.18.1accountability is complete. [] 1.18.2If accountability was not initiated due to personnel safety concerns, monitor plant/site conditions and when personnel safety concern has passed, initiate personnel assembly and accountability. [] 1.18.3 Record time initial accountability completed. Time: \_ [] 1.19 Evacuate all non-ERO personnel per Procedure 5.7.11. [] 1.20Perform follow-up notifications to state and local agencies at least every 60 minutes or sooner if there is a significant change in status of emergency per Procedure 5.7.6. [] 1.21 If escalating to another emergency classification, perform following: [] 1.21.1Announce following to Control Room Staff: [] 1.21.1.1Time of classification. Time: \_\_\_\_\_ [] 1.21.1.2Level of emergency classification. Class: EAL #: [] 1.21.1.3EAL on which classification is based. [] 1.21.1.4Description of condition causing classification. [] 1.21.2Exit this Attachment and enter Attachment for applicable Classification level.

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- [] 1.22 Turnover Emergency Director duties when relieved by another qualified Emergency Director.
  - [] 1.22.1 Use Attachment 7 to turnover to oncoming Emergency Director.
  - [] 1.22.2 Announce to Control Room Staff who Emergency Director is.
  - [] 1.22.3 Exit this Attachment and enter Attachment 5.

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#### 1. ACTIONS FOR GENERAL EMERGENCY

- [] <u>CAUTION</u> Do <u>not</u> re-activate Automated Notification System if Emergency Response Facilities are already being activated.
- [] 1.1 If <u>not</u> previously performed, initiate ERO activation by:
  - [] 1.1.1 Determine if ERO personnel will report to on-site Facilities or to AEOF.
  - [] 1.1.2 On telephone with ANS Activation Module, activate ANS by:
    - [] 1.1.2.1 Picking up telephone.
    - [] <u>NOTE</u> Hanging up phone while ANS is activating may cause ANS to lockup.
    - [] 1.1.2.2 When dial tone received, depress ACTIVATE DIALOGICS pushbutton.
    - [] 1.1.2.3 When voice asks for Scenario Password, depress one of following:
      - [] a. "222 SCENARIO" pushbutton to activate on-site ERFs.
      - [] b. "333 SCENARIO" pushbutton to activate AEOF.
    - [] 1.1.2.4 When ANS tells you goodby, hang up.
  - [] 1.1.3 If ANS telephone with ANS Activation Module is unavailable, have an individual concurrently activate backup notification methods per Attachment 6.
- [] <u>NOTE</u> Accountability will be performed if <u>not</u> previously performed and performing accountability will <u>not</u> additionally THREATEN PERSONNEL SAFETY.<sup>©</sup>
- [] 1.2 Determine if personnel assembly and accountability will be performed.
  - [] 1.2.1 If accountability will be performed, go to Step 1.3.
  - [] 1.2.2 If accountability will <u>not</u> be performed, go to Step 1.4.

|--|

- [] 1.3 Notify personnel and initiate personnel assembly and accountability by:
  - [] 1.3.1 If desired, fill in blanks below for Step 1.3.3.
    - [] 1.3.1.1 In (1), give a brief description of emergency event and if applicable, location.
    - [] 1.3.1.2 In (2), provide following as needed:<sup>®</sup>
      - Locations that should be avoided due to emergency conditions.
      - Include specific evacuation routes to ensure personnel are directed around areas involving significant personnel safety hazards.
      - Any precautions needed for security events/severe weather conditions.
  - [] 1.3.2 Activate Emergency Alarm for 10 seconds.
  - [] 1.3.3 Announce following over station Gaitronics:

Attention All Station Personnel, at \_\_\_\_\_ Emergency Director [time]

declared a GENERAL EMERGENCY.

There is <sup>(1)</sup>\_\_\_\_\_

All personnel report to your Designated Assembly Areas for initial accountability.

All personnel stay clear of <sup>(2)</sup>

Activate Emergency Alarm for 10 seconds and repeat announcement.

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[]	1.4	Notify s	station personnel <u>WITHOUT</u> personnel assembly and accountability by:	
	[]	1.4.1	If desired, fill in blanks below for Step 1.4.3.	
		[]	1.4.1.1 In (1), give a brief description of emergency event and if applicable, location.	
		[]	1.4.1.2	In (2), provide following as needed:®
				<ul> <li>Locations that should be avoided due to emergency conditions.</li> <li>Include specific evacuation routes to ensure personnel are directed around areas involving significant personnel safety hazards.</li> <li>Any precautions needed for security events/severe weather conditions.</li> </ul>
	[]	1.4.2	Activate E	mergency Alarm for 10 seconds.
	[]	1.4.3	Announce following over station Gaitronics:	
				All Station Personnel, at Emergency Director [time] GENERAL EMERGENCY.
			There is <sup>(1)</sup>	
			All personnel stay clear of <sup>(2)</sup> 	
[]	1.5	Record t	time annou	ncement completed. Time:

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- [] 1.6 Make a Protective Action Recommendation (PAR) as part of initial notifications to responsible state and local governmental agencies.
  - [] 1.6.1 If no release in progress, automatic minimum PARs for a GENERAL EMERGENCY are:
    - Evacuation of 2 mile radius,
    - Evacuation of 5 miles downwind of site, and
    - Go indoors and monitor EAS/EBS for remainder of 10 mile Emergency Planning Zone (EPZ).
  - [] 1.6.2 If release in progress, perform following as needed:
    - []1.6.2.1If dose calculation cannot be completed in time to meet<br/>15 minute notification time limits, perform initial<br/>notifications with Automatic minimum PARs and update if<br/>dose information indicates need to expand PAR.
    - [] 1.6.2.2 Have dose calculation performed per Procedure 5.7.17.
    - [] 1.6.2.3 Use projected doses and Procedure 5.7.20 to make PARs.
    - [] 1.6.2.4 If dose based PAR is greater than current PAR, perform notifications to responsible state and local governmental agencies to update them of expanded PAR.
- [] 1.7 Direct on watch individual to complete CNS Notification form per Procedure 5.7.6.
  - [] 1.7.1 Review and sign completed Notification form to authorize transmittal to state and local authorities.
- [] 1.8 Ensure initial notification to responsible state and local governmental agencies is completed within 15 minutes of each declaration of an emergency class per Procedure 5.7.6.
  - [] 1.8.1 Record time state and local authorities contacted. Time: \_\_\_\_\_
- [] 1.9 If <u>not</u> previously performed, ensure ERO pager activation has occurred by one of the following methods:
  - [] 1.9.1 Activation of Control Room or Shift Manager's pager, or

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- [] 1.9.2 ANS activation by calling Ext. 5560 and verifying ANS indicates an active scenario.
- [] 1.10 If ANS fails to activate pagers, have an individual **concurrently** activate backup notification methods per Attachment 6.
- [] 1.11 If <u>not</u> previously performed, ensure Emergency Response Data Systems (ERDS) is activated using PMIS START/STOP Menu. This shall be done as soon as possible but not later than 1 hour after time of declaration of an ALERT or higher classification.
  - []
     1.11.1
     Record time ERDS activated.
     Time: \_\_\_\_\_\_
- [] 1.12 If release in progress, have additional dose calculations performed per Procedure 5.7.17 to determine projected off-site doses for use in determining PAR.
- [] 1.13 Monitor plant conditions and meteorological conditions for changes in PAR.
  - [] 1.13.1 If a change in PAR occurs, complete notifications to responsible state and local governmental agencies within 15 minutes of declaration of the change per Procedure 5.7.6.
  - [] 1.13.2 If a change in PAR occurs, complete notification to NRC immediately after notification of responsible state and local governmental agencies, and not later than 1 hour after declaration of the change per Procedure 5.7.6.
- [] 1.14 Ensure NRC is notified via Emergency Notification System (ENS) immediately after notification of responsible state and local governmental agencies, and not later than 1 hour after declaration of each emergency classification.
  - [] 1.14.1 Record Time NRC Duty Officer is contacted. Time: \_\_\_\_\_
- [] 1.15 If <u>not</u> previously performed, ensure initial accountability of Operations personnel is completed.
- [] 1.16 If any of following conditions exist, **concurrently** enter Procedure 5.7.14 for Stable Iodine Thyroid Blocking:
  - [] 1.16.1 Fuel cladding has been determined to be lost, or
  - [] 1.16.2 Calculated dose of  $\geq$  25 rem (CDE) to thyroid is likely to be received, or

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- [] 1.16.3 Life saving operation is to be undertaken in areas where high levels of radio iodine are suspected and no current air analysis is available.
- [] 1.17 If <u>not</u> previously performed, ensure initial accountability completed by:
  - [] 1.17.1 Within 30 minutes, ensure Security Coordinator reports when initial accountability is complete.
  - [] 1.17.2 If accountability was not initiated due to personnel safety concerns, monitor plant/site conditions and when personnel safety concern has passed, initiate personnel assembly and accountability.
  - [] 1.17.3 Record time initial accountability completed. Time: \_\_\_\_\_
- [] 1.18 Ensure evacuation of all non-ERO personnel has been initiated per Procedure 5.7.11.
- [] 1.19 Perform follow-up notifications to state and local agencies at least every 60 minutes or sooner if there is a significant change in status of emergency per Procedure 5.7.6.
- [] 1.20 Turn-over ED duties when relieved by another qualified Emergency Director.
  - [] 1.20.1 Use Attachment 7 to turnover to oncoming Emergency Director.
  - [] 1.20.2 Announce to Control Room who Emergency Director is.
  - [] 1.20.3 Exit this Attachment and enter Attachment 5.

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#### ATTACHMENT 5 SHIFT MANAGER ACTIONS WHEN ANOTHER INDIVIDUAL IS EMERGENCY DIRECTOR

- 1. SHIFT MANAGER ACTIONS WHEN ANOTHER INDIVIDUAL IS EMERGENCY DIRECTOR
- [] <u>NOTE</u> Perform following steps concurrently, as needed.
- [] 1.1 Notify Emergency Director when changes in plant conditions are discovered that warrant reclassifying to a higher classification.
- [] 1.2 If requested, have emergency announcements made per Attachment 8 when changes in emergency classifications are made.
- [] 1.3 Notify Emergency Director of any significant changes in plant conditions.
- [] 1.4 Notify Emergency Director of any emergent equipment repairs needed.
- [] 1.5 Notify Emergency Director when changes in plant conditions warrant changes in TSC and OSC priorities.
- [] 1.6 Notify Operations Coordinator in TSC of additional support needed from TSC or OSC that is <u>not</u> being obtained through the ED.
- [] 1.7 Coordinate dispatch of Station Operators from Control Room with Chem/RP Coordinator.
- [] 1.8 If SAMG entry is required, implement Procedure 5.9SAMG.
  - [] 1.8.1 Record time Decision Making Authority is transferred to Operations Coordinator.

Time: \_\_\_\_\_

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#### ATTACHMENT 6 ALTERNATE NOTIFICATION METHODS

4 Y ...

- [] 1.1 If CNS ANS is unavailable, activate backup pagers by performing following:
  - [] 1.1.1 If desired, script an addition to voice mail message per Step 1.4.
  - [] 1.1.2 On telephone with ANS Activation Module, pick up telephone.
  - [] 1.1.3 Press ACTIVATE BACKUP pushbutton.
  - [] 1.1.4 When prompted for password, press PASSWORD pushbutton.
  - [] 1.1.5 When prompted for scenario and after tone, press "\_\_\_ SCENARIO" pushbutton.

Scenario Description	Scenario Number
Notification of Unusual Event Declared	100
ERF Activation - Respond to Plant	222
ERF Activation - Respond to AEOF	333

- [] 1.1.6 After hearing message, "Thank you for using ATS", HANG UP.
- [] 1.2 If telephone with ANS Activation Module is <u>not</u> available and CNS ANS is available, perform following:
  - [] 1.2.1 Complete CNS ANS code below by performing following:
    - [] 1.2.1.1 Obtain Emergency Directors Password and write it in blocks.
    - [] 1.2.1.2 Determine and enter appropriate scenario code.

Scenario Description	Scenario Number
Notification of Unusual Event Declared	100
ERF Activation - Respond to Plant	222
ERF Activation - Respond to AEOF	333

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#### ATTACHMENT 6 ALTERNATE NOTIFICATION METHODS

- [] <u>NOTE</u> Hanging up phone while ANS is activating may cause ANS to lock up.
- [] 1.2.2 Activate CNS ANS by dialing and providing following information when requested:

Extension	<u>8579</u>
ED PASSWORD	#
Scenario Number	#
Confirm Event Code	<u>2</u>

If you do not wish to record a "Current Scenario Message", press <u>3#</u>.

If desired to record a "Current Scenario Message":

When ask about "Current Scenario Message", press 2. After the tone speak your message. When finished recording, press #. Listen to message and follow voice mail instructions to modify or accept as desired. To activate chosen scenario and message, press <u>3#</u>.

- [] 1.2.3 Record Time of Completion:
- [] 1.3 If telephone with ANS Activation Module is <u>not</u> available, AND CNS ANS is <u>not</u> available, activate all ERO pagers by:
  - [] 1.3.1 If desired, script an addition to voice mail message per Step 1.4.
- [ ] 1.3.2 Obtain password from Shift Manager cubicle sealed envelope.
  - [] 1.3.3 Determine and enter appropriate scenario code below:

Scenario Description	Scenario Number
Notification of Unusual Event Declared	100
ERF Activation - Respond to Plant	222
ERF Activation - Respond to AEOF	333

## ATTACHMENT 6 ALTERNATE NOTIFICATION METHODS

. . . .

	[]	1.3.4	Dial below number and providing following information when requested:
			Dial 402 633 0469 on any telephone.
			When prompted, ENTER password
			When prompted, ENTER "numeric message" 8255 522.
			After hearing the message "Thank you for using ATS", HANG UP.
	[]	1.3.5	Record Time of Completion:
[]		<u>E</u> - Step I tional.	1.4 is <u>not</u> necessary if CNS Automated Notification System is
[]	1.4		d to provide Emergency responders more specific information prior to at CNS, record a voice mail message by:
	[]	1.4.1	Dial <b>5200</b> (voice mail).
	[]	1.4.2	Enter mailbox number, 5522, and #.
	[]	1.4.3	Enter password, 5522 and #.
	[]	1.4.4	Enter 8, 2 (mailbox greeting).
	[]	1.4.5	Enter 1 (external greeting).
	[]	1.4.6	Enter 2; wait until end of greeting.
	[]	1.4.7	Enter 5 (record command).
	[]	1.4.8	Provide desired information as an addition to the external greeting.
	[]	1.4.9	Enter # when completed.
	[]	1.4.10	Enter 8, 3 (exits voice mail).
	[]	1.4.11	Return to Attachment 6, Step 1.1.2 or 1.3.2, as applicable.

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#### ATTACHMENT 7 EMERGENCY DIRECTOR TURNOVER

- [] 1.1 Emergency Classification Status, circle applicable Classification: Unusual Event Alert Site Area Emergency General Emergency
- [] 1.2 EAL Classification is based upon EAL #: \_\_\_\_\_.
- [] 1.3 Initiating Events:
- [] 1.4 Previous EAL #s Entered:
- [] 1.5 Status of emergency procedure implementation and mitigating actions.
  - [] 1.5.1 Off-Site Notification Form IS / IS NOT Completed
  - []
     1.5.2
     Off-Site Notifications Last Notification #: \_\_\_\_\_\_

Local & States NOT NOTIFIED IN PROGRESS NOTIFIED

Time Completed: \_\_\_\_\_

NRC Duty Officer NOT NOTIFIED IN PROGRESS NOTIFIED

Time Completed: \_\_\_\_\_

[] 1.5.3 Protective Action Recommendations made.

NONE YES (Complete Table Below)

	None	Evacuate Sectors	Go indoors and monitor EAS/EBS in Sectors
0-2 Miles			
2-5 Miles			
5-10 Miles			

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## ATTACHMENT 7 EMERGENCY DIRECTOR TURNOVER

. . . .

[] 1.5.4 Status of Personnel Assembly and Accountability per Procedure 5.7.10.

[] 1.5.5 Status of Stable Iodine Thyroid Blocking per Procedure 5.7.14.

Not Implemented	Implemented and Status is:	
-	-	

[] 1.5.6 Status of dismissal and or evacuation of non-ERO personnel per Procedure 5.7.11.

Not Started and Status is: \_\_\_\_\_

# [] 1.5.7 Radiological conditions release above ODAM limits in progress (circle):

YES NO

#### [] 1.5.8 Status of Release Rate Determinations per Procedure 5.7.16.

Not Started	Started a	nd Status is:	
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#### ATTACHMENT 7 EMERGENCY DIRECTOR TURNOVER

- [] 1.6 Reactor Status (circle): OPERATING SHUTDOWN
- [] 1.7 Fission Product Barrier and Safety System Status (circle): Fuel Cladding: Intact Potential Loss Lost
   Primary Coolant: Intact Potential Loss Lost
   Primary Containment: Intact Potential Loss Lost
   Secondary Containment: Intact Potential Loss Lost
- [ ] 1.8 Evolutions in Progress: \_\_\_\_\_

. . .

- [] 1.10 Site Priorities: \_\_\_\_\_\_

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#### ATTACHMENT 8 ANNOUNCEMENTS WITH ERFS ACTIVATED

[]	1.1	Notify station	personnel of Emergency	Classification (	changes by:
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- [] 1.1.1 If desired, fill in blanks below for Step 1.1.3.
  - [] 1.1.1.1 In (1), give a brief description of emergency event and if applicable, location.
  - [] 1.1.1.2 In (2), provide following as needed:<sup>©</sup>
    - Locations that should be avoided due to emergency conditions.
    - Include specific evacuation routes to ensure personnel are directed around areas involving significant personnel safety hazards.
    - Any precautions needed for security events/severe weather conditions.
- [] 1.1.2 Activate Emergency Alarm for 10 seconds.
- [] 1.1.3 Announce following over station Gaitronics:

Attention All Station Personnel, at \_\_\_\_\_ Emergency Director [time]

declared a (an)

[emergency classification]

There is <sup>(1)</sup>\_\_\_\_\_

All personnel stay clear of <sup>(2)</sup>

Activate Emergency Alarm for 10 seconds and repeat announcement.

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#### ATTACHMENT 9 INFORMATION SHEET

#### 1. DISCUSSION

- 1.1 The responsibility and authority to classify events and make emergency declarations rests with the Emergency Director. The Shift Manager shall initially assume the role of the Emergency Director and remain so until relieved by another qualified Emergency Director. Certain actions may still need to be performed by the Shift Manager, as requested by the Emergency Director, after command and control of the emergency response has been transferred to the EOF.
- 1.2 Four standardized emergency classifications have been established; they are:
  - 1.2.1 NOTIFICATION OF UNUSUAL EVENT (NOUE).
  - 1.2.2 ALERT.
  - 1.2.3 SITE AREA EMERGENCY (SAE).
  - 1.2.4 GENERAL EMERGENCY (GE).
- 1.3 The rationale for the NOUE and ALERT classes is to provide early and prompt recognition and notification of minor events which could lead to more serious consequences or which might be indicative of more serious conditions which are not yet fully realized.
- 1.4 The SAE and GE classes reflect conditions where significant radiological releases are likely or are occurring or there is actual or imminent substantial core degradation or melting with potential for loss of containment. These classifications warrant full mobilization of Emergency Response Organizations and the alerting of the public.
- 1.5 Upon the declaration of any emergency classification, prompt notification is made to the responsible state and local governmental agencies to ensure sufficient emergency response personnel are mobilized and respond to the event in accordance with their respective radiological emergency response plans.
- 1.6 All on-site Emergency Response Facilities are activated following the declaration of an ALERT or higher classification. Activation of Facilities and/or assembly and accountability activities may be delayed if determined by the Emergency Director that personnel safety would be threatened. Facility activation and/or assembly and accountability shall be accomplished as soon as practical after safety concerns pass.

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#### ATTACHMENT 9 INFORMATION SHEET

- 1.7 Representatives from federal and state agencies may dispatch personnel to the EOF. The decision to make prompt notification of the general public will be made at a SAE or GE by the appropriate governmental agencies.
- 1.8 Assessment of meteorological data, radiological dose projections, and other parameters will be made to determine the type of Protective Action Recommendations (PARs) necessary for the protection of the general public. Off-site authorities will implement appropriate protective actions for affected populations based on those PARs, as well as other data they have assembled. The general public will be kept informed of events by media facilities with periodic releases of updated information.
- 1.9 Contracted service companies, sponsor utilities, and other industry resources may be alerted and requested to render assistance, as appropriate. In addition, federal resources may be called upon for assistance.
- 1.10 The Emergency Director shall escalate, terminate, or reduce the emergency classification as conditions warrant.
- 2. **REFERENCES** 
  - 2.1 CODES AND STANDARDS
    - 2.1.1 NPPD Emergency Plan for CNS.
    - 2.1.2 NUREG 0654, Revision 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.
    - 2.1.3 NUREG BR-0150, Volume 1, Revision 1.
  - 2.2 PROCEDURES
    - 2.2.1 Emergency Plan Implementing Procedure 5.7.1, Emergency Classification.
    - 2.2.2 Emergency Plan Implementing Procedure 5.7.6, Notification.
    - 2.2.3 Emergency Plan Implementing Procedure 5.7.10, Personnel Assembly and Accountability.
    - 2.2.4 Emergency Plan Implementing Procedure 5.7.11, Evacuation of Non-Designated Site Personnel.

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#### ATTACHMENT 9 INFORMATION SHEET

- 2.2.5 Emergency Plan Implementing Procedure 5.7.14, Stable Iodine Thyroid Blocking (KI).
- 2.2.6 Emergency Plan Implementing Procedure 5.7.16, Release Rate Determination.
- 2.2.7 Emergency Plan Implementing Procedure 5.7.17, Dose Assessment.
- 2.2.8 Emergency Plan Implementing Procedure 5.7.20, Protective Action Recommendations.
- 2.2.9 Severe Accident Procedure 5.9SAMG, Severe Accident Management Guidance.

#### 2.3 MISCELLANEOUS

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- 2.3.1 CNS Emergency Telephone Directory.
- 2.3.2 NRC Information Notice 83-28.
- 2.3.3 NRC Inspection Report 94-11.
- 2.3.4 <sup>©</sup> NRC Inspection Report 98-12. Affects NOTES prior to Steps 1.2 and 1.4 on Attachment 1, Steps 1.3.1.2 and 1.4.1.2 on Attachment 1, NOTE prior to Step 1.2 on Attachment 2, Steps 1.3.1.2, and 1.4.1.2 on Attachment 2, NOTE prior to Step 1.2 on Attachment 3, Steps 1.3.1.2 and 1.4.1.2 on Attachment 4, Steps 1.3.1.2 and 1.4.1.2 on Attachment 4, Steps 1.3.1.2 and 1.4.1.2 on Attachment 4, and Step 1.1.1.2 on Attachment 8.
- 2.3.5 RCR 2001-0354, Action 13.
- 2.3.6 © TIP Action Plan 5.2.2.1, Revision 1, Action 1. Major revision 6/28/02 to clarify Control Room tasks. Generic nature of TIP Action does not support cross-referencing of specific steps.

#### 2.4 NRC COMMITMENTS

2.4.1 © NLS2002030, Response to Order for Interim Safeguards and Security Compensatory Measures (Commitment Number NLS2002030-18). Commitment affects Step 2.3.

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