

FENOC

FirstEnergy Nuclear Operating Company

COPY

Perry Nuclear Power Plant
10 Center Road
P.O. Box 97
Perry, Ohio 44081

January 30, 2004
PY-CEI/NRR- 2768L

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,

Don Cleaver for David L. Bauguess

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

A-045

FIRSTENERGY CORPORATION
PERRY NUCLEAR POWER PLANT
UNIT 1

ACKNOWLEDGMENT OF RECEIPT

Title Emergency Plan Implementing Instructions EPI-A6/ Rev.12
and EPI-A8 / Rev. 10

Control No. 60

Letter No./Date PY-CEI/NRR-2768L / January 30, 2004

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-A6/ Rev.12
and EPI-A8 / Rev. 10

Control Number 60

Revision
Number

Insert

Remove and Replace

12
10

EPI-A6 / Rev 12
EPI-A8 / Rev 10

Reissue Entire Document
Reissue Entire Document

TECHNICAL SUPPORT CENTER ACTIVATION

1.0 PURPOSE

This instruction describes the activation and operation of the Technical Support Center (TSC), and delineates the responsibilities of designated TSC personnel.

The TSC will be activated for an Alert or higher classification, or at the direction of the Shift Manager, serving as Emergency Coordinator.

2.0 REFERENCES

2.1 Source References

1. Emergency Plan for PNPP Docket Nos. 50-440.

2.2 Use References

1. EPI-B1: Emergency Notification System
2. HPI-B0003: Processing Of Personnel Dosimetry
3. EPI-A1: Emergency Action Levels
4. EPI-A2: Emergency Actions Based On Event Classification
5. EPI-B8: Protective Action and Guides
6. EPI-B5: Personnel Accountability/Site Evacuation
7. NOP-LP-4006: Plant Operations Review Committee (PORC)
8. EPI-B9: Emergency Records
9. Emergency Response Telephone Directory
10. SOI-M52: Technical Support Center Ventilation System
11. PSI-0007: Reporting Emergency Plan-Related Communications Equipment Problems
12. Physical Security Plan
13. SOI-D19: Post Accident Radiation Monitoring System
14. EPI-B3: Radiological Surveys for Emergencies
15. EPI-B7a: Automated Offsite Dose Calculations

16. EPI-B7b: Manual Offsite Dose Calculations
17. EPI-B13: Determination of Core Damage Under Accident Conditions
18. EPI-A7: Operations Support Center Activation
19. Emergency Public Information Organization Instruction Manual (EPIOIM)
20. NOP-LP-1002: Fitness for Duty Program
21. SPI-0032: Notification of Key Emergency Response Organization Personnel
22. EPI-A8: Emergency Operations Facility Activation
23. PAP-1701: Records Management Program
24. Commitments addressed in this document:

B00626	P00010	P00046	P00051
B01028	P00042	P00047	P00053
L01395	P00045	P00050	P00059

3.0 DEFINITIONS

3.1 Activation/Activate

In regards to any emergency response facility, the term ACTIVATION shall refer to that time period from the decision to mobilize or ACTIVATE a facility to the decision to declare the facility OPERATIONAL.

3.2 Operational

In regards to any emergency response facility, the term OPERATIONAL shall refer to the decision to declare a facility functional and ready to perform its stated function(s).

4.0 RESPONSIBILITIES

4.1 Control Room Shift Manager

1. Direct the prompt activation of the TSC as required by the Emergency Plan, and in support of the Control Room for abnormal plant events.
2. Direct the activation of the alternate TSC at either the EOF or, if the site is inaccessible, at the backup EOF based on plant conditions.

4.2 TSC Operations Manager

1. Manage the onsite activities of the Emergency Response Organization (ERO) under the direction of the Emergency Coordinator. <P00050, P00053>
2. Assume the duties and responsibilities of the Emergency Coordinator, from the Shift Manager once the TSC is operational, and subsequently transfer these responsibilities to the Emergency Coordinator in the Emergency Operations Facility (EOF) when it has been declared operational. <P00051>
3. Ensure the TSC is manned and operated in accordance with this instruction.
4. Utilize TSC and Operations Support Center (OSC) staff to provide guidance and direction to assist the Control Room personnel in identifying and mitigating the effects of the emergency condition and in the assessment of plant conditions.
5. Coordinate the combined activities of the TSC, Control Room, and the OSC and all emergency teams and support personnel dispatched from the OSC.
6. Provide information to the Information Liaison stationed in the TSC, and approve Company press statements for event classified as an Alert or more severe.
7. Authorize emergency radiation exposure limit extensions per <HPI-B0003>.
8. Coordinate the quarantining of equipment/components resulting in or caused by events resulting in an Emergency Plan classification per <EPI-A1>.

4.3 Administrative Assistant

1. Coordinate the activation and manning of the TSC in support of the Operations Manager.
2. Coordinate TSC Communicator and Support Staff activities, and the augmentation and relief of TSC staff.
3. Assist TSC staff in obtaining available resources within the Perry Plant departments, and within the Company prior to the EOF being declared operational, which may be required.

4.4 Radiation Protection Coordinator

1. Coordinate all Radiation Protection and Chemistry activities in support of emergency operations, including assessment of radiological hazards within the plant. <P00047>

2. Coordinate interim offsite radiological monitoring, dose assessment, and development of protective action recommendations. <P00046>
3. Coordinate the issuance of dosimetry and the processing of emergency exposure limit extensions per <HPI-B0003>.
4. Coordinate the monitoring of area and airborne radiation levels in the TSC, and direct the shifting of TSC HVAC modes.

4.5 Plant Technical Engineer <P00045>

1. Assess plant parameters to determine the condition of the core, safety related systems, and fission product barriers.
2. Analyze plant conditions and develop guidance for protection of the core.
3. Supervise engineering and design activities in support of emergency operations.
4. Provide a liaison between the ERO, General Electric Company, the Institute of Nuclear Power Operations (INPO), and any other contractor or Industry support organizations.

4.6 Maintenance Coordinator

1. Coordinate the dispatching and tracking of OSC personnel, through the OSC Coordinator, in support of priorities established by the TSC.
2. Obtain required technical support for OSC activities from TSC staff.
3. Provide the OSC with plant technical, operations, and maintenance information, and continuously apprise the OSC Coordinator of current plant status and transient conditions.

4.7 Operations Advisor

1. Continuously review emergency conditions and recommend reclassification of the emergency event, if required.
2. Serve as the Shift Manager's liaison, continuously apprising TSC staff of Control Room operations and requirements.
3. Apprise the Shift Manager of TSC priorities and TSC/OSC activities.
4. Supervise radwaste processing activities in support of emergency operations.

5. Assist the Radiation Protection Coordinator in the development of release duration estimates for protective action calculations, prior to the EOF being declared operational.
6. Serve as interim TSC Operations Manager in the event that the arrival of a designated individual is delayed or the TSC Operations Manager becomes incapacitated.

4.8 Security Coordinator

1. Coordinate all onsite security operations with the Supervisor, Nuclear Security Operations (SNSO), in support of the emergency condition.
2. Coordinate the accountability of onsite personnel, as necessary, in support of the Operations Manager.
3. Coordinate the access control requirements onsite and at the Emergency Operations Facility (EOF).
4. Provide a liaison between the Perry Plant and any Federal, State, or local law enforcement agencies.
5. Assist in the classification or reclassification of security-related events per <EPI-A1>.

4.9 Regulatory Affairs Coordinator

1. Serve as a source of plant and event information for FirstEnergy Liaisons located in State and local County Emergency Operations Centers (EOCs) or Emergency Management Agency (EMA) offices.
2. Coordinate telephone communications with Federal, State, and local county officials, outside of formal notifications performed in accordance with <EPI-B1>.
3. Contact a second Regulatory Affairs Coordinator or relocate to the EOF, when notified that representatives from the State of Ohio are being dispatched to the Perry Plant.
4. Dispatch a FirstEnergy Liaison(s) to the State EOCs when requested.

4.10 Information Liaison

1. Obtain, evaluate, and disseminate information concerning the emergency to the Public Information Response Team (PIRT) or Joint Public Information Center (JPIC) in accordance with the <EPIOIM>.

5.0 ACTIONS

CAUTION

If the site is in a security event, for personnel safety, all actions that involve personnel movement must be coordinated with both the Shift Manager and the Supervisor, Nuclear Security Operations (SNSO).

NOTE

TSC and OSC responders will report to the Ashtabula Service Center if the plant is inaccessible.

The purpose of assembling TSC and OSC responders at this location is to ensure the safety of those personnel and for maintaining some technical assistance to the control room staff. Also, TSC and OSC responders will develop plant priorities, action plans, and preparations to respond to plant events when they regain access to the plant site.

TSC and OSC responders complete all actions below that are practical based upon their temporary relocation to the alternate TSC at Ashtabula Service Center.

5.1 Control Room Shift Manager

1. Direct the activation of the TSC in accordance with <EPI-A2>, or the mobilization of TSC staff in support of a non-Emergency Plan event in accordance with <EPI-A1>.
2. Direct and announce the use of an alternate TSC per <EPI-A2>:
 - a. at the EOF, if plant conditions render the 603' elevation of the Service Building inaccessible, or
 - b. at the Backup EOF if the site is inaccessible.
3. Transfer the non-delegatable Emergency Coordinator duties to the TSC Operations Manager when the facility is operational and when he is ready to assume these duties.

For events not classified under <EPI-A1>, involving the mobilization of TSC staff, the duties and responsibilities of the Emergency Coordinator will remain with the Shift Manager and NOT be transferred to the TSC.

5.2 TSC Operations Manager

5.2.1 Activation:

1. Go directly to Section 6.1 if TSC staff is being mobilized in response to a non-Emergency Plan event; otherwise continue on to Step 2.

2. If the EOF is to be used as the alternate TSC, refer to the Alternate TSC Layout (Attachment 2) before proceeding, otherwise, continue on to Step 3.
3. Direct the Administrative Assistant, to coordinate the activation of the TSC using TSC Activation Checklist (PNPP No. 7987, Attachment 1).
 - a. If a qualified Administrative Assistant is not yet present in the TSC, appoint an interim Administrative Assistant from available personnel.

Goal for declaring the TSC operational is 60 minutes from the time of event classification: 15 minutes for ERO notifications; 30 minute response time when notified; plus 15 minutes to bring facility to an operational status.

4. Contact the Shift Manager to become apprised of current plant status, transient conditions, and emergency actions underway.
5. Utilize the event checklists contained in <EPI-A2> to obtain an accurate appraisal of emergency actions already performed or underway.
6. Periodically, assess personnel staffing levels through the Administrative Assistant, to determine if the following minimum staffing exists to declare the TSC operational:
 - Operations Manager
 - Administrative Assistant
 - "5-Way" Communicator
 - ENS Communicator or assigned engineer
 - Operations Advisor
 - Maintenance Coordinator
 - Plant Technical Engineer
 - Core/Hydraulic (Reactor) Engineer
 - Radiation Protection Coordinator
 - Dose Assessor (on-shift Chemistry Technician)
- a. If the arrival of a required TSC staff member is delayed, use your judgment in appointing another available TSC staff member to cover that position on an interim basis.

b. Direct the Administrative Assistant to track the arrival of qualified personnel for the following TSC positions which can be manned after the TSC is declared operational to augment staffing:

- Electrical Engineer
- Mechanical Engineer
- Regulatory Affairs Coordinator
- Security Coordinator
- Information Liaison
- Radiation Protection Assistant
- Support Staff (3)
- Communicator (3rd)

7. When the minimum staffing requirements are met and the TSC is ready to be declared operational, perform the following steps using the TSC Activation Checklist:

An Interim Operations Manager may declare the TSC operational, and accept responsibility for the non-delegatable Emergency Coordinator duties in coordination with TSC staff.

a. Use Intra-Facility Public Address System (PA) to:

- 1) Brief TSC/OSC staff on current plant status, event conditions, any emergency response efforts underway, and Control Room needs and priorities.
- 2) Remind TSC staff to log-in for accountability purposes using the TSC Hallway card reader.

b. Announce over the Plant PA System that "the TSC is OPERATIONAL, and control for OSC activities (if operational) has been transferred to the TSC". Record time TSC declared OPERATIONAL in logbook.

c. Inform the Security Coordinator that the TSC has assumed responsibility for directing SAS or the EPU Representative to perform further ERO notifications.

- d. Inform the Shift Manager that the TSC is now OPERATIONAL, and establish when the following Emergency Coordinator duties will be transferred to the TSC:
- event classification per EPI-A1
 - offsite notifications per EPI-B1
 - offsite protective action recommendations per EPI-B8
- 1) Notify the TSC administrative Assistant prior to assuming offsite notification responsibilities.

If a notification is pending (within 30 minutes), the TSC should defer assuming offsite notification responsibilities until the upcoming notification is completed.

- e. Announce over the Intra-Facility (TSC-OSC) PA the transfer of Emergency Coordinator duties from the Control Room to the TSC, record transfer in logbook, and post the transfer of responsibilities on facility status board.
- f. Review and sign the TSC Activation Checklist.

5.2.2 Operation:

1. Perform the actions of the Emergency Coordinator outlined in <EPI-A2>, concurrently with this instruction, utilizing the associated event checklist to document completion of required actions, until such time as the EOF is operational or the event is terminated.
2. Direct OSC operations through the Maintenance Coordinator in support of established priorities.

The Control Room Shift Manager will retain the authority to direct the Fire Brigade, First Aid Team (FAT) and shift personnel.

3. Ensure the effective direction of the onsite emergency response effort through the establishment, periodic revision, and tracking of TSC priorities.
 - a. Establish OSC and Engineering Task Priorities in conjunction with TSC staff and post on facility status boards; revise periodically based on changing plant condition.

- b. Direct the quarantining of equipment/components, whose failure resulted in or was caused by events, leading to or associated with the E-Plan classification, and which restoration is not immediately required to support the safe operation or shutdown of the plant.
4. Direct technical and engineering analyses through the Plant Technical Engineer in support of established priorities.
5. Direct radiological aspects of the emergency in-plant and within the site boundary through the Radiation Protection Coordinator.
6. Approve the extension of personnel exposure limits, as recommended by the Radiation Protection Coordinator, per <HPI-B0003>.
7. Approve and implement onsite protective actions as necessary.
8. Ensure the effective and timely communication of TSC priorities and OSC team status to the Shift Manager, and briefing of TSC staff on Control Room activities by the Operations Advisor.
9. Approve the use of potassium iodide (KI) for plant personnel, and Radiation Monitoring Team (RMT) personnel prior to EOF operation, per <EPI-B8>.

NOTE: Offsite Emergency responders, i.e. National Guard, County Sheriff, Fireman, EMT's, assigned to the Perry site perimeter for the duration of the event are regarded as site personnel for the issuance of emergency dosimetry and KI.

10. Ensure the effective and timely implementation of the accountability of onsite personnel through the Security Coordinator per <EPI-B5> at a Site Area Emergency.
11. Periodically review established priorities, and brief TSC personnel on the status of the emergency, Control Room emergency actions underway, and the status of OSC and engineering activities.
12. Provide updates to Federal, State, and local county officials over established telephone links at the request of the Regulatory Affairs Coordinator.
 - a. Do NOT become distracted by calls directly from the NRC or other offsite agencies; refer calls and inquiries to the Regulatory Affairs Coordinator.

13. When informed that the Nuclear Regulatory Commission (NRC) Regional Site Team has been dispatched to the Perry Plant, perform the following:
 - a. Notify Regulatory Affairs Coordinator, the Shift Manager, and the EOF Emergency Coordinator (if the EOF is operational).
 - b. Direct the activation of the EOF at this time, if the EOF has not yet been activated.
14. Direct the transfer of responsibility for offsite notifications, event re-classification, and for approval of offsite protective action recommendations to EOF once operational and the EOF Emergency Coordinator is ready to accept duties, by performing the following:
 - a. Notify the Administrative Assistant when responsibility for offsite notifications will be transferred to the EOF.
 - b. Notify the Radiation Protection Coordinator when responsibility for offsite dose projection and protective actions will be transferred to the EOF.
 - c. Update facility status board to reflect the transfer of Emergency Coordinator duties to the EOF.
15. Direct the Administrative Assistant to establish a Plant Operations Review Committee (PORC), quorum for an unscheduled meeting per <NOP-LP-4006>, if deemed necessary to address procedural concerns.
16. Approve Company news statements for events classified at an Alert or higher, prior to the EOF being declared operational.
17. Authorize the Administrative Assistant to develop and initiate a relief rotation for TSC and OSC staff.
 - If radiation levels resulting from an offsite release restrict the movement of people within the 10-mile EPZ, direct relief personnel to report to a FirstEnergy facility and arrange for transport to the site.
18. Direct the collection of event records per <EPI-B9> and demobilization of the TSC staff upon termination of the event.

5.3 Administrative Assistant

5.3.1 Activation:

1. Go directly to Section 6.2 if TSC staff is being mobilized in response to a non-Emergency Plan event; otherwise continue on to Step 2.

2. Initiate the callout process upon arriving at the TSC when onsite, or prior to departure from home to the TSC by contacting a support staff member or communicator to initiate a call tree, to obtain a total of 3 Communicators and 3 Support Staff. Ensure fitness for duty status is determined per <NOP-LP-1002>.
3. Track the arrival of TSC staff members on TSC Activation Checklist, and brief the TSC Operations Manager on staffing levels upon his arrival and routinely thereafter until required TSC staff positions are filled.
 - a. If the activation of the TSC coincides with the initiation of a site accountability/evacuation, contact the Training and Education Center (TEC) Auditorium at Ext. 7817 and either dismiss the assembled personnel or direct needed personnel to report to the TSC.
4. If an alternate location is being used for the TSC, proceed; otherwise skip this step and continue on to Step 5.
 - a. If the EOF is being used as the alternate TSC, refer to attachment 2 while performing the following steps:
 - 1) Assist arriving TSC staff in finding workstations and equipment.

NOTE: TSC forms and other reference materials are stored in E-Plan locker located in Communicators area.
 - 2) In addition to the actions listed on the TSC Activation Checklist, perform the following:
 - a) Instruct TSC Engineers to use TEC 110/111 Conference Room as a work area and to install telephones stored in E-Plan locker.
 - b) Instruct the On-Call Emergency Plan Representative to assist in placing the EOF HVAC in emergency isolation, if required.
 - b. If the Backup EOF is being used as the alternate TSC, assist arriving TSC staff in finding workstations and equipment using Attachment 3.
5. Coordinate the manning and activation of the TSC utilizing the TSC Activation Checklist.
 - a. Assign Communicators to the following circuits as personnel become available:
 - ("5-way") State and Local County Ringdown.

- NRC Emergency Notification System (ENS) Circuit.
 - FirstEnergy 800 MHz (RMT) Radio Link.
- 1) If sufficient communicators are not available within 45 minutes of declaring the event to support the TSC operational, contact the Shift Manager and coordinate the transfer of Control Room Communicators to the TSC.
- b. Verify that a TSC engineer has been assigned by the Plant Technical Engineer to the NRC ENS Circuit.
 - c. At an Alert classification or above, verify that the Emergency Response Data System (ERDS) link to the NRC has been initiated by the TSC Operations Advisor.
 - 1) If not yet operational, activate ERDS per Section 5.7.1.1 within one (1) hour of the Alert declaration.
 - d. Assign support staff to the following tasks as they become available:
 - TSC Operations Manager's Log
 - TSC Task Priorities/OSC Team Status Boards
 - Plant Technical Data and Plant Radiological Data Status Boards
 - Access Control (if located at the Backup TSC in the EOF, or the alternate TSC at the Ashtabula Service Center).
 - e. Synchronize facility wall clocks in Display Room, FirstEnergy Office, Hallway and the Access Control Point with Integrated Computer System (ICS).
- This action shall not delay declaring TSC operational.
6. Submit the TSC Activation Checklist to the TSC Operations Manager for review and approval once minimum staffing has been met and equipment checks performed.
 - a. If upon completion of the TSC Activation Checklist a designated TSC Operations Manager has not yet arrived, forward the checklist to the TSC Operations Advisor as interim TSC Operations Manager.

7. Inform the TSC Communicators when the TSC will assume responsibility for making offsite notification to the NRC, State of Ohio, and local Counties.

5.3.2 Operation:

1. Coordinate the drafting, review/approval, and transmission of the initial and follow-up notifications to the NRC, State of Ohio, and local counties per <EPI-B1>.
2. Coordinate the drafting, review/approval, and transmission of periodic updates and requests for technical assistance to the INPO and Nuclear Electric Insurers Limited (NEIL) per <EPI-B1>.
3. Conduct telephone callouts for additional TSC staff if required, or to assist the OSC Coordinator in contacting additional personnel, using the <Emergency Response Telephone Directory>. Ensure the fitness for duty status is determined per <NOP-LP-1002>.
4. When informed by the "5-way" Communicator that State representatives are responding to the Perry Plant, perform the following:
 - a. Inform the Regulatory Affairs Coordinator.
 - b. Instruct the Information Liaison to notify the PIRT, at Ext. 5044, of the pending arrival of the State Public Information Officer.
5. When informed by the ENS Communicator that the Health Physics Network (HPN) circuit is to be opened, notify the Radiation Protection Coordinator.
6. When informed by the ENS Communicator that the NRC Regional Site Team or Augmented Inspection Team (AIT) has been dispatched to the Perry Plant, notify the Operations Manager and Regulatory Affairs Coordinator.
 - a. Direct the appropriate Communicator to announce the activation of the EOF over the "5-way" circuit if the TSC Operations Manager directs the activation of the EOF in support of the NRC Site Team.
7. Deleted.
8. Obtain available Perry Plant and Company resources as necessary to support emergency response activities.
 - a. If the EOF is operational, direct any requests for Company resources to the EOF Manager.

9. Initiate repairs to emergency plan-related communications and the Private Branch Exchange (PBX) and Off-Premise Exchange (OPX) Circuits per <PSI-0007>.
10. Initiate repairs to administrative support equipment, i.e., FAX, Copier, Computer, aperture card reader, etc., by contacting the party(ies) listed in the <Emergency Response Telephone Directory> under "Communications Equipment Operating Guidelines."
 - a. If site personnel accountability has been initiated, contact the OSC for available technical repair assistance.
11. When directed to convene an unscheduled PORC meeting, assemble a quorum using a qualified chairman or designated alternate and qualified members or alternates onsite or via a conference call and act as PORC Secretary in accordance with <NOP-LP-4006>.
12. Upon the activation of the EOF, contact the EOF Manager to coordinate the transfer of offsite notification duties, but DO NOT transfer this responsibility until authorized by the TSC Operations Manager.
 - a. Direct the TSC Communicators to transfer offsite notification responsibilities to the EOF when authorized per <EPI-B1>.

The TSC will retain responsibility for maintaining an open ENS line after the EOF is operational and responsibility for offsite notifications have transferred.

13. Coordinate the relief of TSC and OSC personnel at the direction of the TSC Operations Manager by performing the following:
 - a. Determine TSC relief personnel needs for key TSC positions and OSC relief personnel needs through the Maintenance Coordinator using the TSC/OSC Staffing Form (PNPP No. 7882), Attachment 4, and submit rosters to TSC Operations Manager for review and approval.
 - b. Have the Radiation Protection Coordinator determine whether relief personnel should be directed to report to the Perry Plant site or to an offsite company location.

1) If radiation levels from an offsite release restrict movement in the 10-mile EPZ, coordinate with the EOF, if operational, in directing relief personnel when contacted to report to a FirstEnergy facility, such as the Concord Service Center (COSC), in arranging transportation to the site through the Transportation Officer at the Lake County EOC at 953-5480, and in establishing radiological monitoring/dosimetry requirements.

- c. Direct available Communicators and support staff to contact required TSC relief personnel utilizing the <Emergency Response Telephone Directory>. Ensure the fitness for duty status is determined per <NOP-LP-1002>.
- d. Assist the OSC Coordinator in contacting required relief personnel using the OSC Staff Callout Listings available in the OSC. Ensure the fitness for duty status is determined per <NOP-LP-1002>.
- e. Keep the Operations Manager informed of the status of staff relief efforts.

14. Upon deactivation of the TSC perform the following:

- a. Return TSC HVAC to normal operating mode.
- b. Coordinate the collection of event records per <EPI-B9>.
- c. Clean-up of the TSC.
- d. Dismiss facility communicators and support staff.

5.4 Radiation Protection Coordinator

5.4.1 Activation:

1. At an Alert classification or above, perform the following:

- a. Direct the on-shift or other qualified Chemistry technician to report to the TSC as a Dose Assessor and to perform the following:
 - 1) Verify the operability of the Computer-Aided Dose Assessment Program (CADAP) and associated DEC laser printer per <EPI-B7a>.
 - 2) Assemble two (2) RMTs in the EOF Decontamination Room per <EPI-B3>, and brief them prior to deployment. <P00059, P00042>

- 3) Verify that the TSC airborne and area radiation monitors are operating, or are placed in operation per <SOI-D19>.
 - If either the TSC area or airborne radiation monitors are out of service, direct the OSC Radiation Protection Supervisor to have periodical habitability monitoring of the TSC initiated.
 - b. Verify with the OSC that a minimum of four (4) Radiation Protection (RP) technicians are available onsite or are being called in to support in-plant/OSC RP activities.
2. Call-in, or obtain from the OSC if available, a qualified Radiation Protection Assistant (RPA), if additional support is needed to track and evaluate in-plant Radiation Protection concerns and OSC activities. Ensure the fitness for duty status is determined per <NOP-LP-1002> for all call-ins.
 3. Request from the Administrative Assistant that personnel be assigned, when available, to the following positions:
 - a. RMT Communicator
 - b. Radiological Status Boards (in TSC Display Room)

The Radiation Protection Coordinator is responsible for instructing the status board keeper on how and when to update boards, and for resolving any questions or discrepancies in data.

5.4.2 Operation:

1. When notified by the Administrative Assistant to establish an open line on the HPN, assign an available Radiation Protection technician from the OSC to keep the NRC apprised of significant plant Radiation Protection concerns and answer any Radiation Protection related questions regarding the event. <B00626>
2. Direct the Radiation Protection Assistant to perform the following:
 - a. Interface with the OSC RP Supervisor to ensure the continuous monitoring of radiological condition in-plant and onsite.
 - b. Monitor plant radiological trends on the Integrated Computer System (ICS); immediately notify TSC staff and the OSC RP Supervisor of significant changes in radiological conditions.

- c. Assist the Administrative Assistant in completing applicable portions of the Initial Notification form (PNPP No. 7794), Follow-up Notification form (PNPP No. 7795), and Industry Event Notification form (PNPP No. 9596) per <EPI-B1>.
 - d. Periodically update or assist Support Staff in updating facility status boards with current in-plant and site radiological information.
 - e. Assist the HPN Communicator in responding to NRC inquiries and periodic status updates.
3. Recommend the use of protective measures for plant personnel as needed, including the use of potassium iodide (KI) per <EPI-B8>, respirators/self-contained breathing apparatus (SCBAs), etc.

NOTE: Offsite Emergency responders, i.e. National Guard, County Sheriff, Fireman, EMT's, assigned to the Perry site perimeter for the duration of the event are regarded as site personnel for the issuance of emergency dosimetry and KI

4. Direct the Dose Assessor to coordinate the following:
- a. Control and deployment of RMTs per <EPI-B3>. <P00059>
 - b. Assessment of actual or postulated radiological releases per <EPI-B7a> and <EPI-B7b>.
 - c. Development of Protective Action Recommendations (PAR) for the general public per <EPI-B8>.
 - d. Recommendation of protective measures for RMT personnel per <EPI-B3>.
 - e. Ensure that the Radiological Status Boards are updated with dose estimates, meteorology conditions, etc.
5. Review and recommend PARs for the general public to the TSC Operations Manager for approval (prior to the EOF assuming responsibility for PARs).
6. Periodically verify radiation levels on both the TSC area and airborne monitors.
- a. If area or airborne radiation readings exceed normal levels, direct the TSC Maintenance Coordinator to have the TSC HVAC system placed in "recirculation" mode; consider recommending the evacuation of any unnecessary TSC support personnel and issuance of high range dosimetry per <EPI-B11>, and initiate periodic habitability surveys by Radiation Protection.

- b. If either monitor becomes out of service, direct the OSC Radiation Protection Supervisor to initiate periodic TSC habitability monitoring.
7. Coordinate the estimation of core damage, per <EPI-B13>, with the TSC Core/Hydraulic Engineer.
8. If the TSC was activated at an Unusual Event, perform Section 5.4.1.1 to mobilize required staff when event escalates to an Alert classification or above.
9. Upon the declaration of a Site Area Emergency, perform the following:
 - a. Dispatch a Radiation Protection technician to the Primary Access Contact Point (PACP) in support of personnel accountability and, if warranted, recommend to the TSC Operations Manager the use of offsite assembly/decontamination centers per <EPI-B5>.
 - b. Verify a minimum of seven (7) Radiation Protection Technicians and two (2) Chemistry Technicians are onsite in support of in-plant/OSC activities. Direct the OSC to conduct additional callouts as necessary per <NOP-LP-1002>, to meet this commitment.
 - c. Direct the Dose Assessor to mobilize a third RMT per <EPI-B3>, and to brief EOF personnel on dose assessment and RMT activities. <P00042>
 - d. Ensure dosimetry is issued to TSC, Control Room, OSC, and EOF staff per <HPI-B3>.
 - e. Dispatch an RP Technician, when available, to the EOF to assist in radiological monitoring of facility.
 - 1) If Backup EOF is activated in lieu of or in support of onsite facilities, dispatch an RP Technician to the Ashtabula Service Center (ASSC).
10. Once the EOF is operational, perform the following:
 - a. When authorized by the TSC Operations Manager, turnover of responsibility for dose assessment activities per <EPI-B8> and for control of the RMTs per <EPI-B3>.
 - b. Request the Offsite Radiation Advisor (ORA) to open the EOF HPN line and handle NRC requests for dose assessment information.

Responsibility for relaying information on site and in-plant Radiation Protection concerns will remain in the TSC.

- c. At your discretion, relocate the Dose Assessor to the EOF to assist in offsite dose assessment activities.
 - d. Continue to track protective actions being recommended by Perry and implemented offsite.
 - e. Inform the ORA of radiochemistry and radiological survey results or anticipated plant operations which may affect offsite dose projections.
11. Provide instructions to Control Room, OSC, TSC and EOF staff on the collection and processing of dosimetry as part of staff relief or facility deactivation.

5.5 Plant Technical Engineer

5.5.1 Activation:

1. Determine if a Core/Hydraulic Engineer, Electrical Engineer, and Mechanical Engineer have arrived yet.

NOTE: Electrical and Mechanical Engineers have a response time goal of ≤60 minutes; therefore, declaration of the TSC as operational should not be delayed pending the arrival of these engineers.

2. Assign the first available engineer to monitor the NRC ENS Circuit and direct individual to perform the following:

NOTE: Operating instructions are listed in the <Emergency Response Telephone Directory> under "Communications Equipment Operating Guidelines":

- a. Inform the NRC of significant changes in the operational status of the plant or abnormal trends in plant data.
 - b. Record NRC questions and requests on a Communications Record Sheet (PNPP No. 6284) per <EPI-B1>.
 - c. Keep the Regulatory Affairs Coordinator apprised of NRC activities.
3. Contact additional engineering staff members based on the emergency event. Ensure the fitness for duty status is determined for call-ins per <NOP-LP-1002>.
 - a. Contact the on-shift Shift Engineer (SE) to locate the relief shift SE and/or the training Shift SE during normal working hours to support TSC operation.

4. Appoint engineering staff members as they become available, to the following duties:
 - a. Lead Engineer to coordinate and track engineering activities and to brief TSC engineers in plant FirstEnergy Room on event status and plant conditions.
 - b. ICS Operator/Plant Technical Data Status Board Coordinator.
5. Update the Plant Technical Data Status Boards, and request from the Administrative Assistant that a support staff member be assigned to maintain this board when available.

The Plant Technical Engineer is responsible for instructing the status board keeper on how and when to update this board, and for resolving any questions or discrepancies in data.

- a. If the ICS is inoperable or access to data limited, dispatch an available Communicator or TSC/OSC staff member to the Control Room to initiate and maintain an open line over the Status Board Ringdown Circuit.
 - 1) The Status board Ringdown phone in the control room is located in a file drawer in the Unit Supervisor's area.
 - 2) The Status Board Ringdown phone jack is located just below the apron section of P870 nearest P680 and is mounted on the left side of the superphone.
6. Contact the Control Room SE to verify that the TSC-SE Ringdown Circuit is plugged in and operational.
 - a. The SE Ringdown phone, cream color with an amber ringing indicating light, is located in a file drawer in the Unit Supervisor's area.
 - b. The SE Ringdown phone jacks are located in two places.
 - 1) A jack is mounted on the pillar in the horseshoe
 - 2) A second jack is mounted in the shift manager's office, east-end and below the desk.
7. Initiate and track engineering activities in support of the emergency event based on priorities once established.
8. Brief the TSC Operations Manager on engineering activities which are underway or required, as well as engineering support available to respond to the emergency event.

5.5.2 Operation:

1. Deleted
2. Maintain contact with SE for an assessment of plant conditions and current or postulated Control Room actions.
3. Direct the actions of plant technical and engineering design personnel to analyze plant conditions and system/equipment status in support of the Control Room shift staff and based on priorities established by TSC Operations Manager.
4. Track TSC engineering activities and revise assignments as needed to meet current TSC priorities.
5. Assign available engineering support to assist in briefing OSC teams and in providing in-plant engineering support to OSC team members.
6. Act as a liaison between the ERO and INPO, General Electric (SIL No. 324, "BWR Emergency Support Program"), and other contractors or Industry support organizations on technical and design matters. <B01028>
 - a. Request for INPO technical or equipment/expertise location assistance should be made through the Administrative Assistant using an Industry Event Notification form (PNPP No. 9596) per <EPI-B1>.
7. Ensure that the Plant Technical Data Status Board is updated periodically and data, i.e., system status, interpreted when required.
8. Periodically apprise key TSC staff members of plant technical and engineering design activities underway and recommendations developed.

5.6 Maintenance Coordinator

5.6.1 Activation:

1. Contact the OSC Coordinator to become apprised of current OSC staffing and activities underway.
 - a. Appoint an OSC Coordinator from supervisors available in the OSC, if the arrival of a designated OSC Coordinator is delayed.
2. Initially update the OSC Team Status Board and request from the Administrative Assistant that a support member be assigned to maintain this board using the OSC Team Status Ringdown.

The Maintenance Coordinator is responsible for instructing the status board keeper on how and when to update this board, and for resolving any questions or discrepancies in data.

3. Apprise key TSC staff on the status of the OSC, including current and projected staffing levels and activities presently underway or planned.
4. Notify the TSC Operations Manager when ready to assume control of the OSC from the Control Room.

5.6.2 Operation:

1. Notify the OSC Coordinator when control of OSC activities is assumed, and request that TSC Operations Manager announces over the Plant PA the transfer of OSC activities to the TSC.
2. Ensure that the Operations Foreman and the Plant Operators (POs) are relocated to the OSC when operational per <EPI-A7>.

Control of the on-shift POs remains with the Control Room.

3. Direct the dispatching of emergency teams and support personnel from the OSC through the OSC Coordinator per <EPI-A7> in support of the Control Room and based on the priorities established by the TSC Operations Manager.

All plant personnel available onsite, i.e., Security, Safety/Fire Protection technicians, etc., should be assembled and utilized if necessary to support OSC activities until the OSC staff is properly augmented.

4. Establish the briefing requirements, as outlined in <EPI-A7>, for each OSC team directed to be dispatched.
5. Request assistance from the Plant Technical Engineer in briefing OSC teams and for in-plant engineering support when needed.
6. Continuously apprise the OSC Coordinator of plant conditions and emergency actions underway, including Control Room activities and TSC established priorities.
7. Ensure that the OSC Team Status Board is kept current and that key TSC staff are periodically informed of the status of OSC activities.

8. Direct OSC Coordinator to request that the Operations Foreman dispatch a PO to realign the TSC HVAC per <SOI-M52> at the request of the Administrative Assistant or Radiation Protection Coordinator.
9. Assist the Administrative Assistant in developing a relief rotation for OSC staff personnel when needed.
10. Direct the deactivation of the OSC when ordered and notify the TSC Operation Manager when OSC deactivation is complete.

5.7 Operations Advisor

5.7.1 Activation:

1. At an Alert classification or above, activate ERDS with NRC per the following: <L01395>
 - a. Refer to the Emergency Response Data System Users Manual next to the ERDS terminal located in the TSC FirstEnergy Room and EOF Display Room.
 - b. Press the RETURN key.
 - c. When the computer prompts for Username, enter ERDS and press RETURN key.
 - d. When the computer prompts for Password, enter NRCERDS and press RETURN key.
 - e. Enter Option 1 and press RETURN key.

-- If ERDS can not be activated due to computer/modem problems, notify the NRC over ENS Circuit, document failure in log, and contact Computer Support Unit (CSU).
2. Contact the Control Room personnel to become apprised of their activities, plant system/equipment status, and applicable emergency procedures/instructions entered.
3. Assist in the retrieval of plant data from ICS and the initial updating of the Plant Technical Data Status Board.
4. Act as interim Operations Manager per Section 5.2, if the arrival of a qualified TSC Operations Manager is delayed or if the TSC Operations Manager becomes impaired, to allow the TSC to be declared operational in support of the Control Room.
5. Apprise the TSC Operations Manager upon arrival of Control Room and plant emergency activities presently underway.

5.7.2 Operation:

1. Continuously review and compare the criteria set forth in <EPI-A1> with current or projected plant and emergency conditions; recommend reclassification of the emergency event to the Operations Manager, as required.
2. Monitor Control Room actions and operations to ensure compliance with approved operating procedures and instructions (i.e., PEIs, ONIs, etc.).
3. Serve as a liaison to the Shift Manager by:
 - a. Briefing TSC staff of Control Room activities, operations underway or being considered, and needs.
 - b. Apprising Control Room staff of TSC established priorities and the status of TSC engineering and OSC team status and activities.
 - c. Advising the TSC Operations Manager on matters dealing with the operation of the reactor and support systems.
 - d. Assisting in the resolution of any problems regarding the relocation of the Operations Foreman and POs to the OSC or in the effective utilization of the POs.
4. If the TSC was activated at an Unusual Event, perform Section 5.7.1.1 to activate the ERDS broadcast to the NRC when event escalates to an Alert classification or above.
5. Assist the Radiation Protection Coordinator and Dose Assessor in the formulation of release durations for offsite protective actions to the Plant Operations Advisor, when the EOF is operational.
6. Assist in the transfer of plant operations information and actions to the EOF.
7. Assist the Shift Manager in coordinating Radwaste processing activities in coordinating in support of the emergency event.

5.8 Security Coordinator

5.8.1 Activation:

1. Contact the onsite Supervisor, Nuclear Security Operations to determine any immediate security concerns.

2. Become apprised of Security activities underway and update the SNSO on current plant operations and emergency activities, as well as any abnormal radiological conditions in-plant or onsite.
3. Brief the TSC Operations Manager and TSC staff on recent and on-going Site Protection responses.
4. If the TSC is being activated concurrent with a Site Area Emergency declaration, verify that personnel responding to the TSC use the TSC Hallway card reader to log-in for accountability purposes.

5.8.2 Operation:

1. Monitor on-going security, First Aid Team (FAT), and Safety activities; and provide support to the SNSO in support of the Physical Security Plan.

NOTE: Only Channels 3 and 5 can be monitored by radio unit at Security Coordinator's desk.

2. Apprise the SNSO of the emergency actions underway and abnormal radiological conditions in-plant or onsite.
3. Direct the SNSO to have all security officers report to the OSC when operational prior to entering the Radiologically Restricted Area (RRA).
4. Immediately notify TSC staff of an actual or potential fire or first aid incident, and coordinate with the Radiation Protection Coordinator to ensure the prompt entry and support of plant and offsite responders entering the RRA.
5. Provide liaison between the Perry Plant and offsite law enforcement agencies concerning onsite security actions underway and requests for assistance.
6. Upon declaration of a Site Area Emergency or at the direction of the Operations Manager, perform the following:

- a. Commence personnel accountability actions per <EPI-B5>, and verify that TSC staff has logged-in using the TSC Hallway card reader.

Within 30 minutes of initiating accountability, the Control Room Shift Manager must be notified of the number of people unaccounted for and search and rescue actions initiated.

- b. Ensure a Pager Messages form (PNPP No. 9100) is promptly drafted and approved by the TSC Operations Manager; the completed form orally relayed to Secondary Alarm Station (SAS) or the on-call EPU representative; and ERO pagers activated per <SPI-0032>.

5.9 Regulatory Affairs Coordinator

5.9.1 Activation:

1. Become apprised of plant conditions and event status from TSC staff during activation.
2. Contact the State EOC to determine the following:
 - a. Status of the State of Ohio's response to Perry Plant site. If the State makes a decision to respond to the Perry Plant site, perform the actions outlined in Section 5.9.2.4.
 - b. Need to dispatch a FirstEnergy Liaison to the State EOC prior to a Site Area Emergency declaration.
 - c. Discuss event status and probability for the event to worsen.
3. Contact an EMA representative or FirstEnergy County Liaison at the EOCs in Ashtabula, Geauga and Lake Counties and the state to clarify the event status and prognosis, to identify a point of contact for further questions, and to establish a time for activating the Executive Discussion Line (EDL).

NOTE: Offsite planners from Emergency Planning Unit (EPU) are contacted at an Alert level, as part of their respective counties' callout process, and will serve as a liaison between the county EOC and the Perry ERO.

4. Apprise the TSC Operations Manager of current NRC, State and county response to the event.

5.9.2 Operational:

1. At the Site Area Emergency declaration, contact a FirstEnergy Liaison using the <Emergency Response Telephone Directory> and dispatch to the State EOC if not yet performed. Ensure fitness for duty status is determined per <NOP-LP-1002>.
2. Provide an interface with the TSC Engineer manning the ENS Circuit and FirstEnergy State and County Liaisons, in response to NRC, State and local county inquiries.

3. Resolve any concerns regarding communications to offsite government agencies, including any requests for the establishment of additional telephone links not already described in the EPIs.
4. Upon being notified that the State is dispatching representatives to the Perry Plant site, perform the following:
 - a. Update the TSC Operations Manager, and recommend either the activation of the EOF or the co-location of the State representatives at the TSC based on the event status and prognosis.
 - b. Contact and dispatch a second Regulatory Affairs Coordinator to the EOF to meet the State representatives upon their arrival via Ohio National Guard helicopter. Ensure the fitness for duty status is determined per <NOP-LP-1002>.
 - c. Brief the second Regulatory Affairs Coordinator upon his/her arrival onsite.
5. Document communications with offsite officials or FirstEnergy State/County EOC Liaisons in your logbook or using a Communications Record Sheet (PNPP No. 8264) per <EPI-B9>.
6. Once the EOF is activated and declared operational, relocate to the EOF and continue to coordinate the interface with offsite government agencies per <EPI-A8>.

5.10 Records

5.10.1 Records Handling

1. The records generated by emergency response personnel will be collected and maintained by Emergency Planning Unit (EPU) pursuant to <EPI-B9>. The Emergency Records Package will be transferred to Records Management pursuant to <PAP-1701>.

5.10.2 Records Capture

The following records are generated by this document:

Quality Assurance Records

TSC Activation Checklist (PNPP No. 7987)

Non-Quality Records

None

6.0 TSC STAFF MOBILIZATION FOR NON-EMERGENCY PLAN EVENTS

6.1 TSC Operations Manager

Under no circumstances shall the Control Room Shift Manager transfer, or the Operations Manager accept, responsibility for the Emergency Coordinator duties unless the event is classified per <EPI-A1>.

- 6.1.1 Upon arrival, contact the Control Room Shift Manager to become apprised of event/plant conditions and required support.
- 6.1.2 Establish and track task priorities using facility status boards.
- 6.1.3 Brief TSC staff upon their arrival of event/plant condition and direct facility activities in support of established priorities.
- 6.1.4 Direct the Administrative Assistant to coordinate the augmentation of TSC staff based on the event.

No minimum staffing or completion of TSC Activation Checklist is required for staff mobilization outside the Emergency Plan.

- 6.1.5 Direct the Operations Advisor to monitor <EPI-A1> for possible entry into the Emergency Plan based on changing plant conditions, and recommend classification of an event per <EPI-A1> to the Shift Manager if warranted.
- 6.1.6 Upon the Shift Manager's classification of an Emergency Plan event per <EPI-A1>, go directly to Section 5.2.1 and utilize the TSC Activation Checklist to augment staff and coordinate the transfer of Emergency Coordinator duties.

6.2 Administrative Assistant

- 6.2.1 Do NOT initiate the TSC Activation Checklist unless an Emergency Plan event is classified per <EPI-A1>.
- 6.2.2 Instruct TSC Communicator NOT to test the NRC ENS Circuit or "5-Way" State/County Ringdown.
- 6.2.3 Track the arrival of TSC staff and periodically notify the TSC Operations Manager of staffing levels.
- 6.2.4 Initiate callouts for additional TSC support at the direction of the TSC Operations Manager and on-call TSC responders, using available communicators.

6.2.5 Assign support staff as they become available to TSC status boards and the Records Room.

6.2.6 When notified by the TSC Operations Manager that the Emergency Plan has been entered, go to Section 5.3.1 and use the TSC Activation Checklist to ensure minimum staffing and testing of equipment.

TSC ACTIVATION CHECKLIST

(TO BE COMPLETED BY THE ADMINISTRATIVE ASSISTANT)

PNPP No. 7987 Rev. 1/19/04

EPI-A6

A. TSC rooms are unlocked [NOTE: Master key located in keybox outside TSC Records Room.]

B. Verify TSC manning levels:

Minimum TSC Staffing Requirements: NAME

- TSC Operations Manager _____
- Operations Advisor _____
- Maintenance Coordinator _____
- Plant Technical Engineer _____
- Core/Hydraulic (Reactor) Engineer _____
- Radiation Protection Coordinator _____
- Dose Assessor (shift Chemistry Tech.) _____
- Administrative Assistant _____
- "5-Way" Communicator _____
- NOTE: Control Room communicator can be relocated to TSC to support facility activation or qualified I&C technicians used from OSC.
- ENS Communicator or assigned engineer _____

POSITIONS NOT REQUIRED TO DECLARE TSC	
OPERATIONAL	NAME
<input checked="" type="checkbox"/>	Electrical Engineer
<input checked="" type="checkbox"/>	Mechanical Engineer
<input checked="" type="checkbox"/>	Regulatory Affairs Coordinator
<input checked="" type="checkbox"/>	Security Coordinator
<input checked="" type="checkbox"/>	Information Liaison
<input checked="" type="checkbox"/>	Radiation Protection Assistant
<input checked="" type="checkbox"/>	RMT Communicator
<input checked="" type="checkbox"/>	Support Staff #1 - Operations Manager's Log
<input checked="" type="checkbox"/>	Support Staff #2 - Task Priorities & OSC Team Status Board
<input checked="" type="checkbox"/>	Support Staff #3 - Plant Technical Data & Plant Radiological Data Status Boards
<input checked="" type="checkbox"/>	Support Staff #4 - Access Control

Note: Support Staff #4 Access Control is only needed when one of the Alternate TSC's are required to activate

C. IF TSC ACTIVATION AND PERSONNEL ACCOUNTABILITY ARE BEING PERFORMED SIMULTANEOUSLY, call Ext. 7817 or request that a Security Officer or available TSC/OSC staff member be dispatched to the CORBETT Auditorium to assess available manpower. Direct needed personnel to report to the TSC and notify Security at PACP.

D. Test the following circuits:

- Intra-Facility (TSC-OSC) PA
- Turn up Plant PA ceiling speakers in TSC rooms & hallway

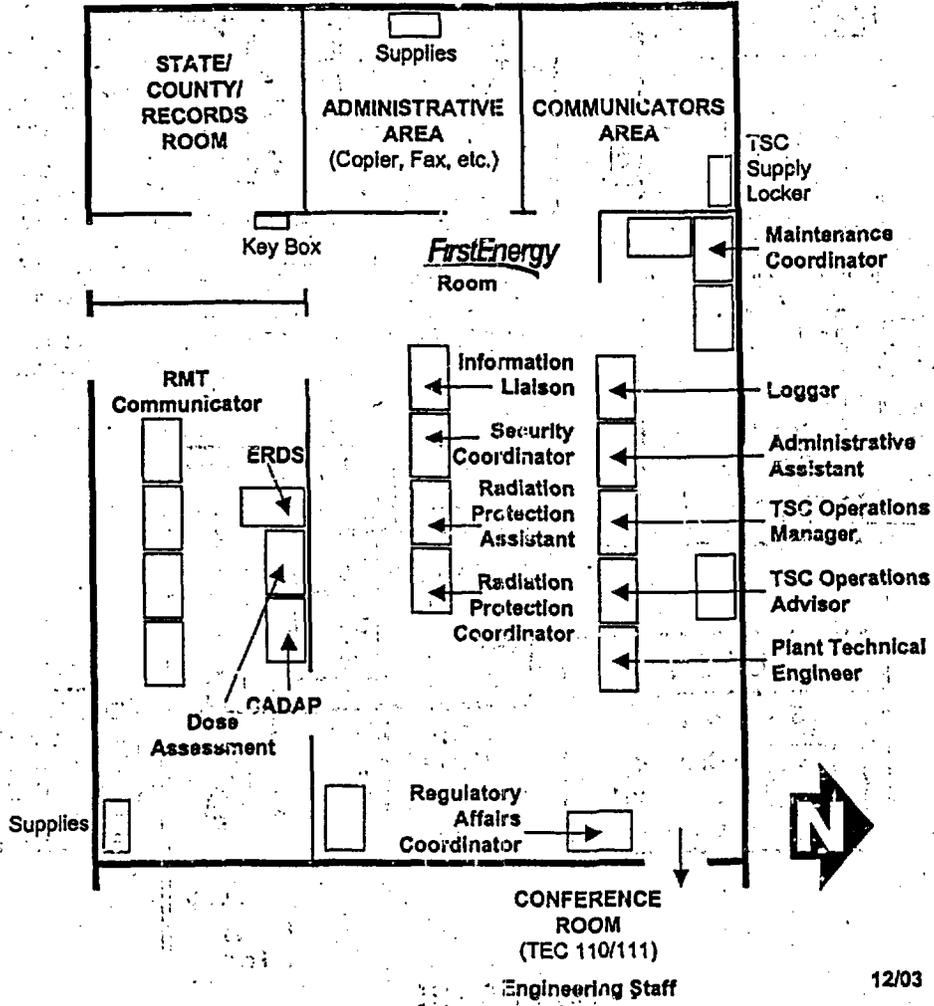
E. Verify that the Operations Advisor has activated the ERDS transmission to the NRC. If not yet performed, initiate transmission at this time per EPI-A6 Section 5.7.1.1.

NOT REQUIRED TO DECLARE FACILITY OPERATIONAL

- F. Facility wall clocks in the Display Room, FIRSTENERGY Room, & Hallway synchronized with ICS
- G. If EOF, which is the alternate TSC is used, relocate drawings from the TEC 2nd floor records room (Room 222)

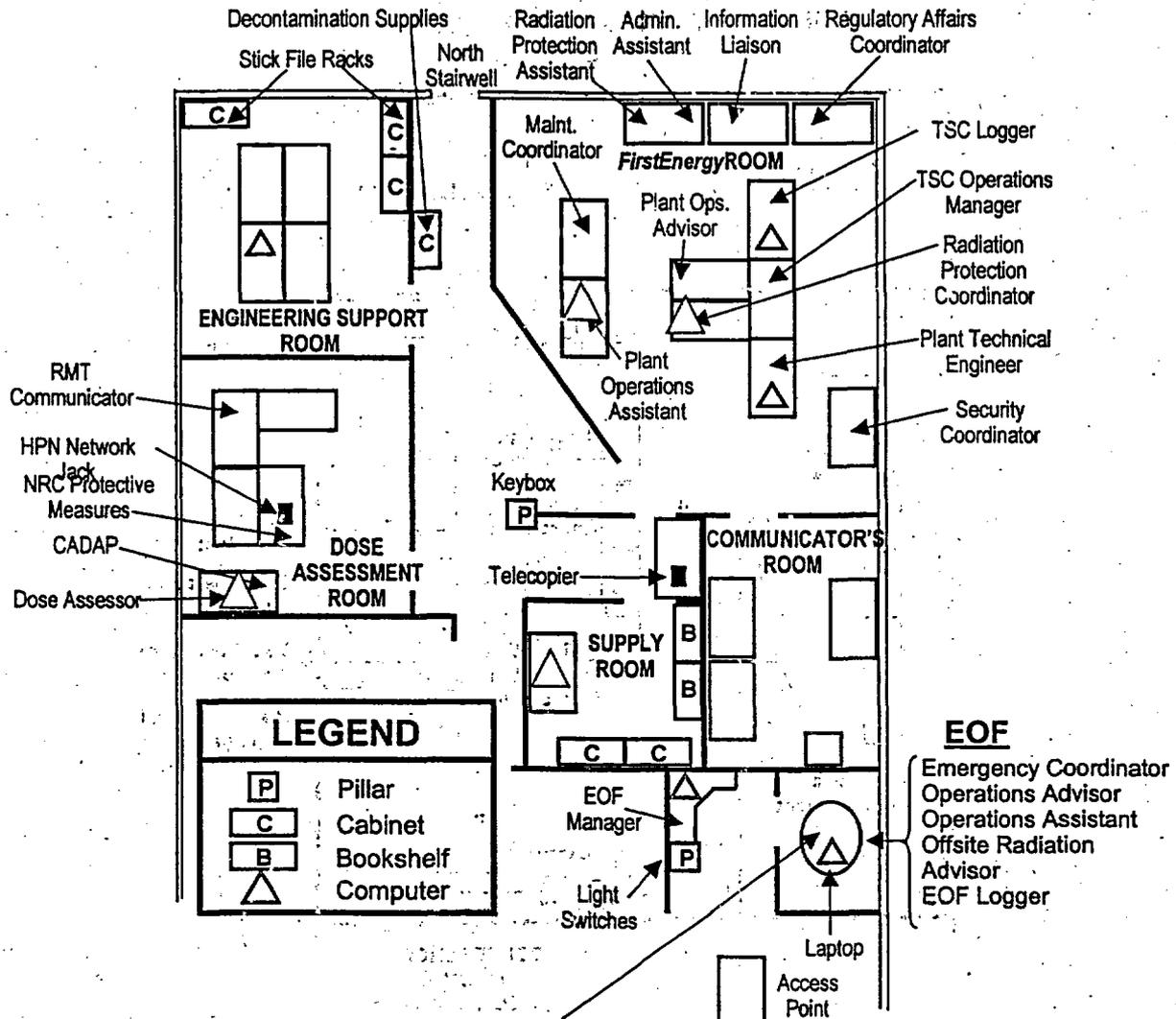
Submitted By: _____ / / @ _____ hours
Administrative Assistant Date Time

**FERRY NUCLEAR POWER PLANT
ALTERNATE TECHNICAL SUPPORT CENTER LAYOUT:
TRAINING CENTER (TEC)
(EMERGENCY OPERATIONS FACILITY)
FIRST FLOOR**



12/03

**ASHTABULA SERVICE CENTER TECHNICAL
SUPPORT CENTER /BEOF LAYOUT**
ASHTABULA SERVICE CENTER SECOND FLOOR



TELEPHONES

- 1- EOF Logger
- 1- Emergency Coordinator
- 1- Operations Assistant
- 1- 3-Way Speaker Phone

07/02

TSC/OSC STAFFING

PNPP No. 7882 Rev. 12/1/03

EPI-A6

Page 1 of 2

	PRESENT STAFF		RELIEF AS OF: _____		RELIEF AS OF: _____	
	NAME		NAME	LOCATION	NAME	LOCATION
TSC OPERATIONS MANAGER						
TSC OPERATIONS ADVISOR						
TSC MAINTENANCE COORD.						
TSC RAD PROTECTION COORD.						
TSC RAD PROTECTION ASSISTANTS						
TSC DOSE ASSESSOR						
TSC ADMINISTRATIVE ASSIST.						
TSC COMMUNICATORS						
TSC SUPPORT STAFF						
TSC PLANT TECHNICAL ENG.						
TSC CORE/HYDRAULIC ENGINEER						
TSC ELECTRICAL ENGINEER						
TSC MECHANICAL ENGINEER						
TSC TECHNICAL ENGINEERING STAFF						
TSC REGULATORY AFFAIRS COORDINATOR						
TSC SECURITY COORD.						
TSC EP ASSISTANT						
TSC INFORMATION LIAISON						

COMPLETED BY: _____ DATE _____ / TIME _____ PROPOSED RELIEF (APPROVED): _____ (NA if not applicable)
Operations Manager

TSC/OSC STAFFING

PNPP No. 7882 Rev. 12/1/03

EPI-A6

Page 2 of 2

	PRESENT STAFF		RELIEF AS OF: _____		RELIEF AS OF: _____	
	NAME		NAME	LOCATION	NAME	LOCATION
OSC COORDINATOR						
OSC OPS FOREMAN						
OSC SUPPORT STAFF						
OSC RP TECHS						
OSC RMT HELPERS						
OSC MECHANICAL SUPERVISOR						
OSC ELECTRICAL SUPERVISOR						
OSC I&C SUPERVISOR						
OSC RAD. PROT. SUPERVISOR						
OSC CHEMISTRY SUPERVISOR						
OSC MAINT. ELECTRICIANS						
OSC MAINT. MECHANICS						
OSC I&C TECHNICIANS						
OSC PLANT OPERATORS						
OSC POA FIRE BRIGADE						
OSC WORK PLANNERS						

COMPLETED BY: _____ DATE _____ / _____ TIME _____ PROPOSED RELIEF (APPROVED): _____ (NA if not applicable)
Operations Manager

PERRY OPERATIONS MANUAL

INFORMATION
ONLY

Emergency Plan Implementing Instruction

PNP
~~XXXXXXXXXX~~
CONTROLLED COPY
No.

TITLE: EMERGENCY OPERATIONS FACILITY ACTIVATION

REVISION: 10

EFFECTIVE DATE: 1-27-04

PREPARED: Dan Cleavenger

12-12-03
/ Date

EMERGENCY OPERATIONS FACILITY ACTIVATION

Table of Contents

<u>Section</u>	<u>Title</u>	<u>Page</u>
1.0	<u>PURPOSE</u>	1
2.0	<u>REFERENCES</u>	1
3.0	<u>DEFINITIONS</u>	2
4.0	<u>RESPONSIBILITIES</u>	3
4.1	Emergency Coordinator	3
4.2	EOF Manager	3
4.3	Offsite Radiation Advisor	3
4.4	Plant Operations Advisor	3
4.5	Regulatory Affairs Coordinator	4
4.6	Information Liaison	4
4.7	Access Controller	4
5.0	<u>ACTIONS</u>	5
5.1	Emergency Coordinator	5
5.2	EOF Manager	8
5.3	Offsite Radiation Advisor	12
5.4	Plant Operations Advisor	16
5.5	Regulatory Affairs Coordinator	17
5.6	Records	19
	<u>ATTACHMENTS</u>	
	Attachment 1 - EOF Activation Checklist	20
	Attachment 2 - EOF HVAC Emergency Isolation Checklist	22
	Attachment 3 - EOF Access Control Point Set-Up	24
	Attachment 4 - Portal Radiation Monitor Response Check	25
	Attachment 5 - EOF Staffing	26
	Attachment 6 - EOF Support Staff Checklist for the Distribution of Documentation	27
	Attachment 7 - EOF Communicator Activation Checklist	29

SCOPE OF REVISION:

- Rev.10 -
1. Revised Use Reference. PAP-0103 was deleted and replaced with NOP-LP-4006, Plant Operations Review Committee.
 2. 4.7.1 - Deleted reference to SPI-023. Security no longer takes on this responsibility.
 3. 4.7.1 - Added a note statement explaining that the EOF Manager is responsible for assigning an Access Controller.
 4. 4.7.2 - Step 2 was moved to Step 3 and a new Step 2 was added. The new Step 2 describes whom the Access controller contacts upon activation.

SCOPE OF REVISION (Cont.):

- Rev. 10 - 5. 4.7.3 - This step was revised to coordinate the issuance of dosimetry.
6. 5.1.1.4 - The title of RMT Communicator was revised to Environmental Liaison/RMT Communicator.
7. 5.1.1.4.b - The number of Support Staff was increased from 4 to 5.
8. 5.2.1.2 - Added the Environmental Liaison to the EOF Managers activation list when determining and assigning personnel.
9. 5.2.1.2 b - Added the Access Controller to the EOF Managers activation list when determining and assigning personnel.
10. 5.2.1.5 - Added a Note statement to Step 5 letting the EOF Manager know that additional engineering drawings are available as a reference source in the TEC Records Room 222 and if needed can be relocated to the EOF.
11. 5.2.1 - Step 6 was revised eliminating the need to relocate a copier from the 2nd floor TEC based on a copier being available in the EOF. Old Steps 7, 8 and 9 were renumbered to 6, 7 and 8.
12. 5.2.1.5 - Revised this step to direct the communicators to use the newly developed checklist (Attachment 7).
13. 5.2.2.3 - Added a new Step 3 that directs the Support Staff to distribute copies of documentation using the newly developed checklist (Attachment 6) and renumbered steps.
14. 5.2.2.9.c - Deleted reference to the SCC Dispatcher and the extension and replaced it with a reference to the Help Desk and their phone number.
15. 5.2.2.10 - Deleted old Step b and replaced it with a note statement that describes that the ventilation system will automatically swap to standby if temperatures increase.
16. 5.2.2.12 - Deleted reference to aperture card readers they no longer exist in the simulator or the 2nd floor training Center. Hardcopies and Curator are available for reference in place of the aperture cards.
17. 5.2.2.13 - Deleted reference to Perry VAX and replaced with Company computer systems and updated the Help Desk extension.
18. 5.2.2.14.a - Added a new Attachment 5 "EOF Staffing" form.
19. 5.2.2.14.b.1 - Corrected the Title of the Transportation Coordinator and corrected their telephone number.
20. 5.4.1.5 - Deleted the portion of the reference that listed Screen 157, screen 157 was replaced with SDS screens.
21. Corrected typographical and reference errors identified during the review of this instruction.
22. Added a new Attachment 6 "EOF Support Staff Checklist for the Distribution of Documentation."
23. Added a new Attachment 7 "EOF Communicator Activation Checklist."

EMERGENCY OPERATIONS FACILITY ACTIVATION

1.0 PURPOSE

This instruction describes the activation and operation of the Emergency Operations Facility (EOF), and delineates the responsibilities of designated EOF personnel.

The EOF will be activated for a Site Area Emergency or General Emergency, or at the discretion of the Shift Manager or Technical Support Center (TSC) Operations Manager, serving as Emergency Coordinator.

2.0 REFERENCES

2.1 Source References:

1. Emergency Plan for PNPP Docket Nos. 50-440

2.2 Use References:

1. Emergency Public Information Organization Instructions Manual (EPIOIM)
2. Emergency Response Telephone Directory
3. EPI-A1: Emergency Action Levels
4. EPI-A2: Emergency Actions Based On Event Classification
5. EPI-A11: Activation of the Backup Emergency Operations Facility
6. EPI-B1: Emergency Notification System
7. EPI-B3: Radiological Surveys for Emergencies
8. EPI-B7a: Automated Offsite Dose Calculations
9. EPI-B7b: Manual Offsite Dose Calculations
10. EPI-B8: Protective Actions and Guides
11. EPI-B9: Emergency Records
12. EPI-B10: Emergency Radiological Environmental Monitoring Program
13. EPI-B11: Emergency Dosimetry Issue
14. HPI-B0003: Processing Of Personnel Dosimetry

15. NOP-LP-4006: Plant Operations Review Committee
16. PAP-1701: Records Management Program
17. PSI-0007: Reporting Emergency Plan-Related Communication Equipment Problems
18. SOI-D19: Post Accident Radiation Monitoring System
19. Commitments addressed in this document:

B00626	P00048	P00052
L01314	P00049	P00059
P00042	P00050	

3.0 DEFINITIONS

3.1 Activation/Activate

In regards to any emergency response facility, the term ACTIVATION shall refer to that time period from the decision to mobilize or ACTIVATE a facility to the decision to declare the facility OPERATIONAL.

3.2 Operational

In regards to any emergency response facility, the term OPERATIONAL shall refer to the decision to declare a facility functional and ready to perform its stated function(s).

4.0 RESPONSIBILITIES

4.1 Emergency Coordinator

1. Coordinate the overall activities of the Perry Plant Emergency Response Organization (ERO).
2. Assume the duties and responsibilities of the Emergency Coordinator from the TSC Operations Manager once the EOF is operational.
3. Ensure the EOF is staffed and operated in accordance with this instruction.
4. Assist the Operations Manager in the TSC in coordinating onsite emergency response effort.
5. Provide corporate, management-level, policy decisions necessary to support emergency operations.

6. Interface with senior levels of offsite government and support agencies.
7. Apprise Corporate management of emergency response activities.
8. Ensure timely and accurate information is provided to the Emergency Public Information Organization.
9. Direct the activation of the Back-Up Emergency Operations Facility (BEOF) if necessary.

4.2 EOF Manager

1. Coordinate the activation and staffing of the EOF in support of the Emergency Coordinator.
2. Direct EOF support staff in support of other key EOF positions to ensure the proper and efficient operation of the EOF.
3. Direct the EOF communicators as necessary to ensure the efficient transfer of information from and to the EOF.
4. Coordinate the augmentation and relief of the EOF staff.
5. Arrange and obtain necessary Company/Corporate or other offsite resources as requested.
6. Coordinate personnel access and accountability in the EOF.
7. Arrange for food and lodging of emergency response personnel.

4.3 Offsite Radiation Advisor

1. Oversee Radiation Monitoring Team (RMT) operations coordinated by the EOF Environmental Liaison.
2. Direct the performance of offsite dose projections and development of protective actions recommendations for the general public through the Lead Dose Assessor. <P00048>
3. Direct continuing offsite radiological assessment activities, including environmental monitoring/sampling.
4. Coordinate the monitoring of area and airborne radiation levels in the EOF and personnel entering the EOF for contamination.

4.4 Plant Operations Advisor

1. Provide the Emergency Coordinator with an operational insight of the emergency event and interpret plant design and system operation issues when required.

2. Assist the Regulatory Affairs Coordinator in briefing Federal, State and local County officials present in the EOF on operational and technical aspects of the emergency event.
3. Assist the Offsite Radiation Advisor in accurately determining the duration of an offsite release.

4.5 Regulatory Affairs Coordinator

1. Act as a liaison between the Perry Plant ERO and Federal, State of Ohio and local county officials present in the EOF.
2. Serve as a source of plant and event information for FirstEnergy Liaisons located at the State and local county Emergency Operations Centers (EOCs).
3. Oversee telephone communications with Federal, State and local counties, outside of formal notifications performed in accordance with <EPI-B1>.

4.6 Information Liaison

1. Obtain, evaluate and disseminate information concerning the emergency to the Public Information Response Team (PIRT) or Joint Public Information Center (JPIC) in accordance with <EPIOIM>.

4.7 Access Controller

1. Control access to the EOF to maintain personnel accountability within the facility.

NOTE: The position of Access Controller is assigned by the EOF Manager. The purpose of access control is to ensure adequate security protection is in place to keep unauthorized personnel from entering the EOF.

2. Once the EOF is activated, contact the Shift Nuclear Security Officer (SNSO) and request that additional patrols of the EOF be made.
3. Coordinate the issuance of dosimetry to the EOF staff members per <EPI-B11>.

5.0 ACTIONS

5.1 Emergency Coordinator

5.1.1 Activation:

1. Direct the EOF Manager, to coordinate the activation of the EOF using the EOF Activation Checklist (PNPP No. 7988, Attachment 1).
 - a. If a qualified EOF Manager is not yet present in the EOF, appoint an interim EOF Manager from available personnel.

Goal for declaring the EOF operational is 90 minutes: 15 minutes for ERO notifications; 60 minutes response time when notified; plus 15 minutes to bring facility to an operational status.

2. Contact the TSC Operations Manager to become apprised of the current plant status, any transient conditions and emergency actions underway. <P00049>
3. Utilize the event checklist contained in <EPI-A2> to obtain an accurate appraisal of emergency actions already performed or underway.
4. Periodically, assess personnel staffing levels, through the EOF Manager, to determine if the following minimum staffing exists to declare the EOF operational:
 - Emergency Coordinator
 - Plant Operations Advisor
 - Offsite Radiation Advisor
 - Dose Assessor #1
 - Regulatory Affairs Coordinator
 - EOF Manager
 - "5-Way" Communicator
 - ENS Communicator
 - Environmental Liaison/RMT Communicator
 - a. If the arrival of a required EOF staff member is delayed, appoint another EOF staff member to cover that position on an interim basis.
 - b. Direct the EOF Manager to track the arrival of qualified personnel for the following positions which can be manned after the EOF is declared operational:
 - Plant Operations Assistant
 - Environmental Liaison
 - Dose Assessor #2
 - HPN Communicator
 - Information Liaison
 - Support Staff (5)

5. When minimum staffing requirements are met, perform the following steps to declare the EOF operational, using the EOF Activation Checklist:

- a. Use the Intra-Facility PA to brief EOF staff on current plant status, emergency and actions underway, Control Room needs, and TSC priorities.
- b. Announce over the Plant PA System that "the EOF is OPERATIONAL". Record the EOF declared OPERATIONAL in logbook.
- c. Inform the TSC Operations Manager and Shift Manager that the EOF is now OPERATIONAL, and establish when the following Emergency Coordinator duties will be transferred to the EOF:
 - event classification per EPI-A1
 - offsite notifications per EPI-B1
 - offsite protective action recommendations (PARS) per EPI-B8

If a notification is pending (within 30 minutes), the EOF should defer assuming offsite notification responsibilities until the upcoming notification is completed.

- 1) Notify the EOF Manager prior to assuming offsite notification responsibilities.
- 2) Notify the Offsite Radiation Advisor prior to assuming responsibility for offsite PARS.

d. Announce over the Intra-Facility (EOF) PA the transfer of Emergency Coordinator duties from the TSC to the EOF, record transfer in logbook, and post the transfer of responsibilities on facility status board.

e. Review and sign EOF Activation Checklist.

5.1.2 Operation:

1. Perform the actions of the Emergency Coordinator as outlined in <EPI-A2>, which include:

- approval of offsite notifications per <EPI-B1>;
- approval of offsite protective actions for the general public per <EPI-B8>; and
- approval of decision to reclassify or terminate the event, or enter into Recovery per <EPI-A1>.

2. Coordinate the overall activities of the ERO to stabilize and reduce the severity of the emergency, and to minimize radiological exposure to the general public.

The Operations Manager will maintain control of onsite activities under the direction of the Emergency Coordinator. <P00050>

3. Commit or obtain approval to commit Company/Corporate resources as necessary to support emergency efforts.
 - a. Utilize available plant management, not presently assigned an ERO duty, to effectively update and interface with Company/Corporate management.
4. Keep apprised of ERO in-plant priorities established by the TSC Operations Manager, and ensure that priorities reflect concerns of Federal, State and local agencies in regards to preventing or mitigating the consequences of an offsite radiological release.
5. Ensure that Federal, State and local County officials in the EOF are adequately briefed on past, current and proposed plant actions.
6. Perform periodic briefings to Federal and State officials at the request of the Regulatory Affairs Coordinator, or local county commissioners as necessary, to explain or resolve questions over the implementation of protective actions or any plant actions being taken by the Perry Plant to control and mitigate the event.
 - a. Do NOT become distracted by calls directly from the Nuclear Regulatory Commission (NRC) or other offsite agencies; refer calls and inquiries to the Regulatory Affairs Coordinator.
7. Ensure that the Information Liaison is kept informed of plant conditions and emergency actions underway and that all inquiries from the PIRT or JPIC are answered.
8. Approve Company news statements prior to release to the media.
9. Direct the TSC Operations Manager to establish a Plant Operations Review Committee (PORC) quorum for an unscheduled meeting per <NOP-LP-4006>, if deemed necessary, to address issues/changes requiring PORC review.
10. Approve the use of potassium iodide (KI) for RMT personnel per <EPI-B8> based on the Offsite Radiation Advisor's recommendation.

Responsibility for approving KI use for plant personnel, including EOF staff, remains with the TSC Operations Manager.

11. When deemed appropriate, relax EOF access and dosimetry requirements based on the recommendation of the EOF Manager and Offsite Radiation Advisor (ORA).
12. Authorize the EOF Manager to develop and initiate a relief rotation for EOF staff and RMT personnel.
 - a. If radiation levels result from an offsite release restrict the movement of people within the 10-mile EPZ, direct relief personnel to report to a FirstEnergy facility and arrange for transportation to the site.
13. Direct the activation of the BEOF in accordance with <EPI-A11> if, at some time the EOF is not capable of performing its designated function or becomes inaccessible due to an offsite release.
14. Inform the EOF Manager when/if responsibility for making offsite notifications is to be transferred back to the TSC or Control Room.
15. Direct the collection of event records per <EPI-B9> and demobilization of the EOF staff upon termination of the event or activation of the BEOF.

5.2 EOF Manager

5.2.1 Activation:

1. Track the arrival of EOF staff and coordinate the manning of the EOF using the EOF Activation Checklist; periodically brief the Emergency Coordinator on EOF staffing levels.

Once notified, initiate the callout process for Communicators and Support Staff, upon arriving at EOF if onsite or prior to your departure from home, by contacting one (1) Communicator and one (1) clerical member and directing them to conduct further callouts.

2. Assess the personnel resources available at TEC 110/111, and assign an Environmental Liaison, communicators and clerical personnel to the following duties as they become available.

a. Communicators:

- ("5-Way") State and Local County Ringdown
- NRC Emergency Notification System (ENS) Circuit
- FirstEnergy 800 MHz (RMT) Radio
- *NRC Health Physics Network (HPN) Circuit

b. Support (Clerical) Staff:

- *Emergency Coordinator's Log.
- *Plant Technical Data Board.

Support (Clerical) Staff (Cont.):

- *Meteorology/Protective Action Status Boards (FirstEnergy Room only).
- *EOF Clerk/Messenger (Copier, telecopier, etc.).
- *Access Controller.

* Position does not have to be manned to declare EOF operational.

3. Initiate callouts for additional communicators first, then clerical staff, as necessary using the <Emergency Response Telephone Directory>.
4. Isolate the EOF Ventilation System, using the EOF HVAC Emergency Isolation Checklist (PNPP No. 8055, Attachment 2), if informed that a radiation hazard to the EOF exists.

Direct communicators to use the EOF Communicator Checklist, Attachment 7, to do the following:

- Test the Intra-Facility PA.
- Synchronize wall clocks with ICS.
- Ensure RMT Radio is programmed to 5G.
- Notify EOF manager prior to assuming offsite notification responsibilities.

This action shall not delay declaring EOF operational.

5. Synchronize facility wall clocks in the FirstEnergy Office, Display Room, NRC/PIRT Room, and at the Access Point with Integrated Computer System (ICS).

NOTE: Additional engineering drawings are available for use in the second floor Records Room (Room 222) and can be relocated to the first floor State/County/Records room if needed.

6. Direct the set-up of TEC110/111, as required to support EOF staff, using phones located in FirstEnergy Room E-Plan Locker.
7. Submit the EOF Activation Checklist to the Emergency Coordinator for review and approval, once minimum staffing has been met and equipment checks performed.
8. Inform the EOF Communicators when the EOF has assumed responsibility for making offsite notifications to the NRC, State of Ohio, and local Counties.

5.2.2 Operation:

1. Coordinate the drafting, review/approval, and transmission of initial and follow-up notification to the Nuclear Regulatory Commission (NRC), State of Ohio, and local counties per <EPI-B1>.
2. Coordinate the drafting, review/approval, and transmission of periodic updates to the Institute of Nuclear Power Operations (INPO) and American Nuclear Insurers (ANI) per <EPI-B1>.

Requests to INPO for technical assistance will continue to originate from the TSC, with the TSC Plant Technical Engineer serving as the point of contact.

3. Direct Support Staff to distribute copies of documentation using the "EOF Support Staff Checklist for Distribution of Documentation" (Attachment 6).
4. Conduct telephone callouts for additional EOF Communicators and support staff using the <Emergency Response Telephone Directory>, if required, and assign to the duties listed in Section 5.2.1.2 as they become available.
5. Provide administrative support to the Regulatory Affairs Coordinator and Federal, State and local officials in the EOF, as needed.
6. Arrange and obtain any Company/Corporate or other offsite resources as directed.
7. Resolve any conflicts concerning personnel access to the EOF.
8. Inform the Offsite Radiation Advisor of any requests made over the ENS Circuit to open the NRC HPN circuit; ensure a Communicator has been assigned to the HPN phone in the EOF and at the TSC.
9. When informed that the NRC Regional Site Team will be responding to the Perry Plant, perform the following:
 - a. Ensure that the Emergency Coordinator and Regulatory Affairs Coordinator are aware of the team's pending arrival.
 - b. Notify the PIRT Manager in the NRC Office, if the PIRT is still in operation, that the NRC Site Team has been dispatched and its estimate time of arrival.
 - c. Contact the Help Desk at Ext. 8-811-4357 to place the appropriate personnel on standby to support the installation of NRC radio equipment onsite upon the Site Team's arrival.

10. When informed that a radiation or airborne radiation hazard exists, external to the EOF, isolate the EOF Ventilation System using EOF HVAC Emergency Isolation Checklist.

- a. If EOF temperature in one or more rooms increases or can not be maintained at an acceptable temperature, verify that the ceiling vents are open and baseboard heaters are off in the room(s) in question.

NOTE: If temperature continues to increase, the system will automatically swap to the standby unit per Step 6 on "EOF HVAC Emergency Isolation Checklist".

11. Initiate repairs to emergency plan-related communications and the Private Branch Exchange (PBX) and Off-Premise Exchange (OPX) Circuits per <PSI-0007>.

12. Utilize telecopiers, photo copiers and located in the 1st floor Simulator Offices or on the 2nd floor of the Training Center if mechanical problems arise.

13. Report problems in accessing the Company computer systems to the Help Desk at extension 8-811-4357.

14. Coordinate the relief of EOF staff and RMT personnel at the direction of the Emergency Coordinator by performing the following:

- a. Determine EOF relief personnel needs from key EOF positions, and submit roster (Attachment 5) to Emergency Coordinator for review and approval.
- b. Request that the ORA determine whether relief personnel should be directed to report to the Perry Plant site or an offsite Company location.
- 1) If radiation levels from an offsite release restrict movement in the 10-mile EPZ, coordinate with the TSC/OSC in directing relief personnel when contacted to report to FirstEnergy facility, such as the Concord Service Center (COSC), in arranging for transportation to the site through the Transportation Coordinator at the Lake County EOC (440-918-5480) and in establishing radiological monitoring/dosimetry requirements.
- c. Direct available Communicators and support staff to contact required EOF relief personnel utilizing the <Emergency Response Telephone Directory>.
- d. Keep the Emergency Coordinator informed of the status of staff relief efforts.

15. Upon deactivation of the EOF perform the following:
 - a. Return EOF HVAC to its normal operating mode.
 - b. Coordinate the collection of event records per <EPI-B9>.
 - c. Clean-up of the EOF.
 - d. Dismiss facility communicators and support staff.

5.3 Offsite Radiation Advisor

5.3.1 Activation:

1. Identify qualified Dose Assessors and an Environmental Liaison from personnel available in the OSC or reporting to EOF Display Room and TEC110/111 as part of personnel accountability.
2. Contact additional personnel utilizing the <Emergency Response Telephone Directory> to ensure a minimum of two (2) Dose Assessors and an Environmental Liaison are available.

During an off-hour activation, an effort should be made to initiate the callout process, prior to your departure to the EOF from home, by contacting one (1) Dose Assessor and directing him to conduct further callouts.

3. Contact the TSC Radiation Protection Coordinator (RPC) to request Radiation Protection (RP) support for facility radiation monitoring and dosimetry issue activities at the EOF.
4. Assign a Lead Dose Assessor to coordinate performance of the following:
 - a. Verify the operability of the Computer-Aided Dose Assessment Program (CADAP) and associated DEC laser printer per <EPI-B7a>.
 - b. Ensure that the EOF radiation and airborne monitors are operable per <SOI-D19>:
 - 1) If either the EOF area or airborne radiation monitors are out of service, direct the HP technician assigned to the EOF to initiate periodic monitoring of EOF habitability.

Ensure the results of any habitability survey are properly documented.

- c. Ensure that the portal radiation monitor at the Access Point is operational per Attachment 4, or establish a radiological Control Point for personnel contamination monitoring at the EOF access using EOF Access Control Point Set-Up (Attachment 3). <L01314>

- d. Ensure that an Environmental Liaison/RMT Communicator has been assigned by the EOF Manager.
- e. Contact the TSC Dose Assessment Area to become apprised of current radiological conditions, protective actions (both recommended and implemented), and the status of the RMTs.
- f. Coordinate the formation of a third RMT and upcoming transfer of RMT activities to the EOF with the Environmental Liaison per <EPI-B3>. <P00042, P00059>
- g. Brief Dose Assessors on current radiological conditions and assessment activities being performed by the TSC, and prepare for the pending transfer of dose assessment activities to the EOF.

The EOF shall NOT assume responsibility from the TSC for dose assessment and RMT activities until authorized by the Emergency Coordinator.

- h. Update radiological and meteorological status boards in the Display Room.
- i. Establish an open HPN line, using Communicator assigned by the EOF Manager, and assume responsibility from the TSC for updating the NRC of offsite dose assessment and radiological release matters.

The TSC will continue to interface with the NRC regarding plant health physics matters.

5. Direct that the Lead Dose Assessor notifies you immediately when ready to accept assessment and plume tracking responsibilities from the TSC.
6. Update the meteorological and protective action status boards in the FirstEnergy Room, and request the EOF Manager to assign support staff member to maintain these status boards.

The ORA is responsible for instructing the status board keeper on how and when to update boards, and for resolving any questions or discrepancies in data.

7. Inform the EOF Manager when your personnel and equipment are available to support EOF operation.

5.3.2 Operation:

1. When authorized by the Emergency Coordinator, notify the TSC RPC and direct the Lead Dose Assessor to assume control of the RMTs and responsibility for dose assessment activities.

2. Ensure dosimetry is issued to EOF staff per <EPI-B11> and coordinate with the TSC in obtaining additional dosimetry in support of RMT and EOF staff relief or augmentation.
 3. Direct the Lead Dose Assessor to coordinate the following:
 - a. Perform offsite dose calculations per <EPI-B7a> and <EPI-B7b> to evaluate the impact to the general public of an actual or potential release to the environment.
 - b. Develop protective action recommendations (PARs) for the general public in accordance with <EPI-B8>, based on plant conditions and dose assessments performed.
 - c. If warranted, request a post accident coolant or grab sample through the TSC Radiation Protection Coordinator.
 4. Direct the Environmental Liaison to perform the following:
 - a. Coordinate with the Lead Dose Assessor in directing RMTs to track, confirm, and assess a release from the Perry Plant per <EPI-B3>.
 - b. Utilize RMT and dose projection data to develop a deposition "footprint" of any radiological release for the collection of environmental samples.
 5. Review and recommend PARs for the general public to the Emergency Coordinator for approval.
 6. Assist the EOF Manager in completing applicable portions of the Initial Notification form (PNPP No. 7794) and Follow-up Notification form (PNPP No. 7795) per <EPI-B1>.
 - a. Use Block #8 on the Follow-Up Notification form to indicate whether an elevated release has or is occurring, and to designate if Page 2 of 2 of form is required to provide supplemental release data.
- Page 2 of 2 on the Follow-Up Notification form can be completed manually by the Dose Assessor or automatically generated by CADAP using <EPI-B7a>.
7. Recommend the use of potassium iodine (KI) by RMT personnel to the Emergency Coordinator for approval per <EPI-B8>.
 8. Request emergency exposure limit extensions through the TSC RPC for RMT personnel per <HPI-B0003 >.
 9. When notified by the NRC to maintain an open HPN line after the EOF is operational, perform the following: <B00626>
 - a. Direct the Lead Dose Assessor to establish an open HPN line in the Display Room.

- b. Notify the TSC Radiation Protection Coordinator.
 - c. Assume responsibility from the TSC for interfacing with the NRC on dose assessment matters only.
 10. Ensure that the Meteorology/Protective Action, Plant Technical Data, and Radiological Data status boards in both the FirstEnergy and Display Rooms are kept updated.
 11. Verify or coordinate determination of reactor shutdown time and/or release duration with the Plant Operations Advisor, if needed.
 12. Periodically apprise the Emergency Coordinator of dose assessment and plume tracking activities as well as radiological conditions in the EOF.
 13. Provide plant radiological and meteorological information, as requested, as well as dose projections and protective action calculation results to representatives from the State of Ohio and the NRC Site Team present in the EOF.
 14. Periodically check radiation levels on both the EOF area and airborne monitors.
 - a. If area or airborne radiation readings exceed normal levels, direct the EOF Manager to isolate the EOF Ventilation System; consider recommending the evacuation of any unnecessary EOF support personnel and issuance of high range dosimetry per <EPI-B11>; and direct the RP technician present to initiate periodic habitability surveys.
- Consideration should be given towards the activation of the BEOF if radiation levels become a concern in the EOF or restricted access to the EOF due to external radiation level prevent the effective operation of the facility.
- b. If either monitor becomes out of service, direct the RP technician present in the EOF to initiate periodic monitoring of EOF habitability.
 15. When required, direct the Environmental Liaison to coordinate the collection, packaging and shipment of environmental samples per <EPI-B10>.
 16. Provide instructions to EOF staff and RMTs on the collection and processing of dosimetry as part of staff relief or facility deactivation.

5.4 Plant Operations Advisor

5.4.1 Activation:

1. Contact the Unit Supervisor or at least one (1) Reactor Operator from the training shift Control Room crew to serve as Plant Operations Assistant.
2. Contact the Operations Advisor to become apprised of current or expected plant conditions, emergency actions, ERO in-plant priorities, and Control Room operations underway.
3. Check to ensure the ICS and associated graphic printer is operable.
4. Update the Plant Technical Data Status Board, and request from the EOF Manager that a support staff member be assigned to maintain this status board.
5. Direct the Plant Operations Assistant, upon his arrival, to:
 - a. Provide updates to the Plant Technical Data Status Board keeper, and instruct on how and when to update board (Ref.: ICS Screen).
 - b. Resolve any questions or discrepancies regarding status board data.
 - c. Monitor plant system and fission product barrier status using ICS.
 - d. Assist the Dose Assessors, when requested, in determining core state, release pathway, time of shutdown, and release duration for an on-going or potential radiological release. <P00048>
 - e. Support operational duties of the Plant Operations Advisor listed in Section 5.4.2.
6. Inform the EOF Manager when your personnel and equipment are available to support EOF operation.
7. Brief the Emergency Coordinator on plant conditions and emergency actions underway to mitigate and/or terminate the event.

5.4.2 Operation:

1. Apprise EOF staff on plant conditions, integrity of fission product barriers, and emergency action taken or being considered by the TSC and Control Room.
2. Provide an operational insight, and interpret plant design and system operation issues for the Emergency Coordinator.

3. Assist the Regulatory Affairs Coordinator, when requested, in clarifying operational and technical aspects of the event to Federal, State and local counties officials in the EOF.
4. Assist the ORA and Dose Assessors in the performance of offsite dose and protective action calculations.
5. Ensure that the Plant Technical Data Status Board is kept updated by the Plant Operations Assistant.
6. Direct the Plant Operation Assistant's (POA) activities as required to ensure that the above actions are addressed in a timely accurate and thorough manner. <P00052>

5.5 Regulatory Affairs Coordinator

5.5.1 Second Regulatory Affairs Coordinator (Reporting to EOF Prior to Activation):

1. Obtain a briefing from the TSC (on-call) Regulatory Affairs Coordinator on plant status and emergency events, then report to the EOF.
2. Upon the arrival of the State/local county representative(s), perform the following:
 - a. Identify the designated work areas in the EOF.
 - b. Provide an overview of plant conditions, event status and prognosis, and ERO priorities.
3. Arrange "Escorted Visitor" access to the TSC through the TSC Security Coordinator, if deemed appropriate, to keep individuals apprised of events.
4. If offsite interest in the event justifies, recommend to the TSC Operations Manager the activation of the EOF.

5.5.2 EOF Operational:

Once the EOF is declared operational, the TSC (on-call) Regulatory Affairs Coordinator (RAC) will relocate to the EOF. The On-Call EPU Representative, when available, can also be used to support RAC duties.

1. Direct the "5-Way" Communicator to announce over the circuit when the EOF is operational and request that Lake County open the EOF drop off the State/County Executive Discussion Line (EDL).

2. Provide a preliminary update on changing event and protective action recommendation status, or significant changes in plant conditions over the EDL, as a supplement to <EPI-B1> notifications, and respond to questions and inquiries for State/local county Executive Group members.
3. When notified by the access controller of the arrival at the EOF of government officials, perform the following:
 - a. Authorize access for any individuals not listed on the EOF Access List and obtain plant dosimetry.
 - b. Direct the individual(s) to the State/Local Room or NRC Office for an initial briefing.
 - c. Provide a briefing on plant conditions, event, ERO in-plant priorities, and major emergency actions being planned or underway.
 - d. Discuss the layout of the EOF, including personnel staffing, the location and operation of facility equipment.
 - e. Provide the Federal, State and local county liaisons with copies of previously communicated initial and follow-up notification forms, and any other requested information.
 - f. Assist these individuals in becoming familiar with EOF operations and staffing, and their designated work area(s).

State Representative	-	FirstEnergy Room (State desk)
County Liaisons	-	State/County Office
NRC Site Team	-	NRC Office and counterpart seating in FirstEnergy and Display Rooms.

Government officials should be given unlimited access to EOF work areas; however, the Regulatory Affairs Coordinator should assist these officials as necessary to prevent them from interfering with the duties being performed by EOF staff members.

3. Provide periodic updates to Federal, State and local county representatives in the EOF; ensure representatives are included in facility status briefings.
4. Serve as the point of contact for the FirstEnergy Liaisons located in the State and County EOCs.

5.6 Records

5.6.1 Records Handling

1. The records generated by emergency response personnel will be collected and maintained by Emergency Planning Unit (EPU) pursuant to <EPI-B9>. The Emergency Records Package will be transferred to Records Management pursuant to <PAP-1701>.

5.6.2 Records Capture

The following records are generated by this document:

Quality Assurance Records

EOF Activation Checklist (PNPP No. 7988)

EOF HVAC Emergency Isolation Checklist (PNPP No. 8055)

Non-Quality Records

None

EOF HVAC EMERGENCY ISOLATION CHECKLIST

PNPP No. 8055 Rev. 12/15/03

EPI-A8

The following procedure is used to shift the first floor TEC/EOF HVAC system (M53) from "NORMAL" operation to EOF "EMERGENCY ISOLATION". Refer to M53 system diagrams as necessary.

1. Obtain the key for the 1st floor Mechanical Equipment Room from the EOF Emergency Key Box.
2. Proceed to first floor Mechanical Equipment Room.
 NOTE: All switches are located on Master Control Panel, 0M53-P001.
 - a. Position or verify "FIRST FLOOR SMOKE DAMPER" Switch (S3) to "AUTO".
 - b. Position or verify the "PLENUM OUTSIDE AIR INTAKE DAMPER F1" Switch (S6) to "CLOSE".
 - c. Position or verify "FIRST FLOOR DAMPER MODE SELECTOR" Switch (S5) to "RECIRC".
 - d. Position or verify the First Floor Air Handlers are enabled by placing the respective switch "0M53B0100A First Floor AHU" (S1) and "0M53B0100B First Floor AHU" (S2) to AUTO.
 - e. Position "EMERGENCY ISOLATION SWITCH" (S7) to "EMERG ISOL".
3. Proceed to north-south corridor on the west side of the building and verify Isolation Door between TEC and EOF closed.
 - 3a. Verify West end of building door leading outside is closed and latched.
4. Proceed to north-south corridor on the east side of the building and verify Isolation Door between TEC and EOF closed.
 - 4a. Verify East end of building doors leading outside are closed and latched.
 The EOF HVAC is now in the Emergency Isolation Mode.
 NOTE: Switch the sign for Ventilation Status in the Display Room and in the FirstEnergy Room to "Emergency Recirculation Mode".
5. If EOF temperature in one or more rooms increase or can not be maintained at an acceptable temperature, verify that the ceiling vents are open and base board heaters are off in the room(s) in question.
6. If temperature continues to increase the system will automatically swap to the standby unit.
7. Admit Filtered outside air to the EOF as desired for Ventilation purposes (to reduce stuffiness/CO₂ level) by performing the following at Master Control Panel, 0M53-P001.
 - a. Open Damper 0M53-F048 (F1) by placing "PLENUM OUTSIDE AIR INTAKE DAMPER" Control Switch (S6) to OPEN.
 - b. When outside air is no longer required Close Damper 0M53-F048 (F1) by placing "PLENUM OUTSIDE AIR INTAKE DAMPER" Control Switch (S6) to CLOSE.
8. If airborne activity levels increased significantly in the EOF with the HVAC in the Emergency Isolation mode, request via the TSC that OSC personnel be dispatched to the EOF to verify the isolation dampers are in the closed position. Initial verification can be made utilizing the installed computer located in the 2nd floor mechanical equipment room. If dampers are positioned properly in the computer and a problem is still suspected a visual inspection of the dampers should be performed.

EOF HVAC EMERGENCY ISOLATION CHECKLIST

PNPP No. 8055 Rev. 12/15/03

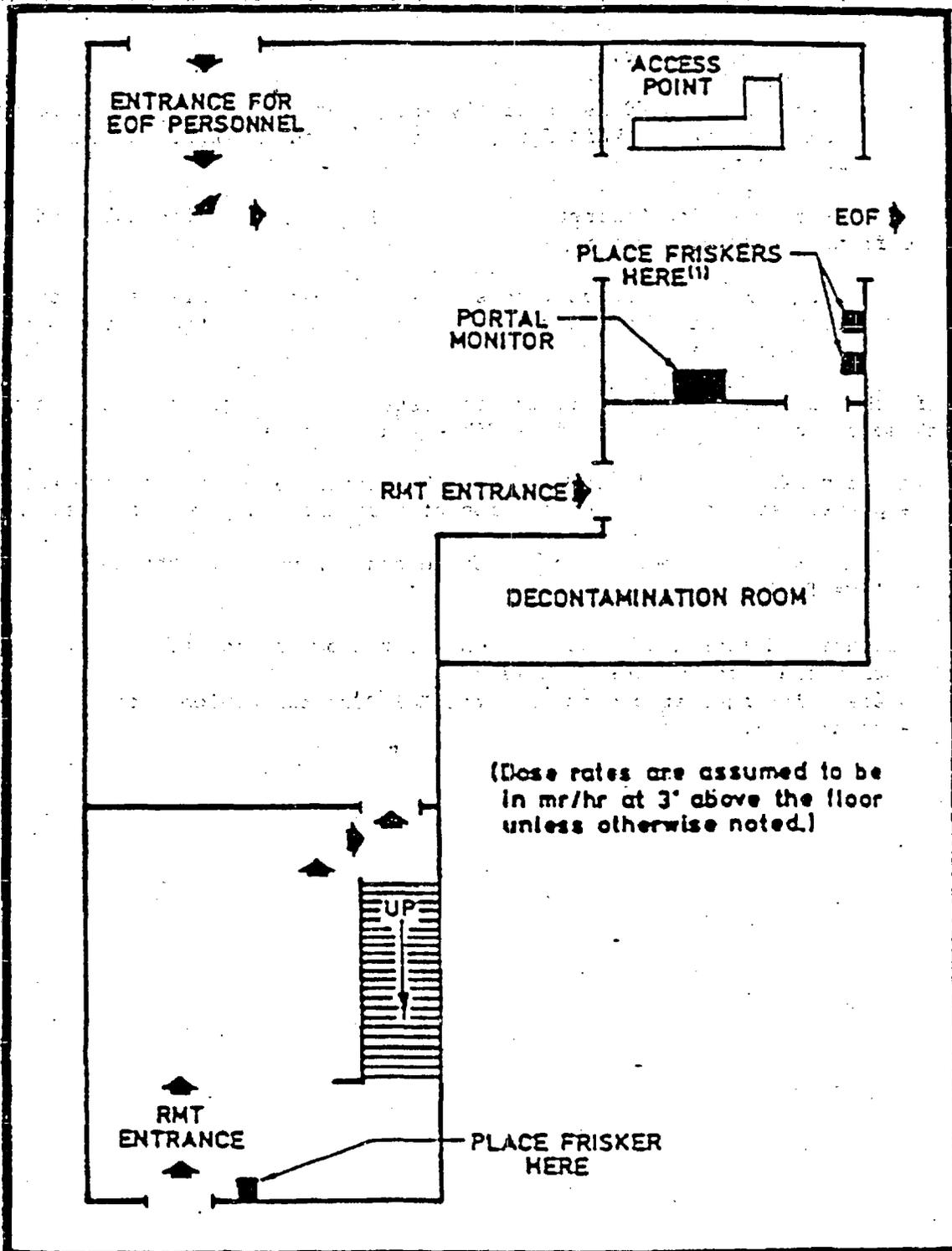
EPI-A8

To return system to "NORMAL" operation:

- 9. Proceed to first floor Mechanical Equipment Room.
NOTE: All switches are located on Master Control Panel, 0M53-P001.
 - a. Position "EMERGENCY ISOLATION SWITCH" (S7) to "NORMAL"
 - b. Return the air handling units 0M53-B100A and 0M53-B100B to Normal operation by placing or verifying the respective switches "0M53-B100A First Floor AHU" (S1) and "0M53-B100B First Floor AHU" (S2) to "AUTO"
 - c. Position the "FIRST FLOOR DAMPER MODE SELECTOR" Switch (S5) to "AUTO".
 - d. Position or verify the "PLENUM OUTSIDE AIR INTAKE DAMPER F1" Switch (S6) to "CLOSE".
 - e. Position or verify "FIRST FLOOR SMOKE DAMPER" Switch (S3) to "AUTO".

10. The EOF is now in Normal Operation. Switch the sign for Ventilation Status in the Display Room and in the FirstEnergy "Normal Mode".

EOF ACCESS CONTROL POINT SET-UP



(1) Set friskers if portal monitor is not operational

Portal Radiation Monitor Response Check

Response check the Gamma-10 portal radiation monitor using the following steps:

1. Energize the portal monitor.

NOTE: When the Gamma 60 is initially energized, a 30 second background count is taken. Wait for completion of the background count before proceeding.

2. Obtain check source from Cabinet #5 in the EOF Decontamination Room and proceed to the front of portal monitor.

NOTE: Portal monitor are very sensitive. If Gamma 60 alarms as you proceed to the front of monitor, remove the source from the area and press the black reset button.

3. Verify that each Gamma 60 portal monitor detector (6 total) responds to the check source by producing both an audible and visual alarm.

4. Initial Response Check Calendar, Form #6983, which is located on the exit side of the portal detector, upon completion of a satisfactory response check.

5. If the Gamma 60 portal monitor does not respond properly to the response check, perform the following:

- Prepare and attach a DO NOT USE tag to the portal monitor.
- Notify the Lead EOF Dose Assessor.
- Stage frisking stations outside the EOF Decontamination Room per Attachment 3.

EOF SUPPORT STAFF CHECKLIST FOR THE DISTRIBUTION OF DOCUMENTATION

PNPP No. 10225 Rev. 12/15/03

Page 2 of 2

EPI-A8

F. Upon completion of the "State of Ohio Supplemental Action Form" (PNPP No. 10062A, PNPP No. 10062B or PNPP No. 10062C) by the Communicators, copy and distribute the form as follows:

- One copy - Offsite Radiation Advisor
- One copy - EOF Emergency Coordinator
- One copy - EOF Operations Advisor
- One copy - EOF Information Liaison
- One copy - Regulatory Affairs Coordinator

Note any problems.

Submitted By: _____ / / @ _____ hours
Date Time

EOF COMMUNICATOR ACTIVATION CHECKLIST

(UPON COMPLETION PROVIDE THE COMPLETED CHECKLIST TO THE EOF MANAGER)

PNPP No. 10224 Rev. 12/19/03

EPI-A8

Test the following circuits:

- A. Intra-Facility PA. (DOSE ASSESSMENT ROOM, FIRSTENERGY ROOM & PIRT) Set the volume level to an audible level that is acceptable for the staff.
- B. Synchronize facility wall clocks with the Integrated Computer System (ICS) in the DOSE ASSESSMENT ROOM, FIRSTENERGY ROOM & ACCESS CONTROL STATION.
- C. Ensure the RMT radio is programmed to 5G.
- D. Notify the EOF Manager prior to assuming offsite notification responsibilities.

Upon completion of the steps above, report immediately to the EOF Manager and let him/her know that the steps are complete and the communicators are now ready to assume Offsite Notifications.

Submitted By: _____ COMMUNICATOR _____ / / @ _____ hours
Date Time