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Charles A. Bottemiller Manager Plant Licensing

GNRO-2004/00020

March 10, 2004

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

Subject: Changes to Emergency Plan Implementing Procedures –March 10, 2004

Grand Gulf Nuclear Station Docket No. 50-416 License No. NPF-29

Ladies & Gentlemen:

Entergy Operations, Inc. submits in accordance with 10CFR50 Appendix E, Section V changes to the following Emergency Plan Implementing Procedure(s):

10-S-01-30 Rev. 12

This letter does not contain any commitments.

Yours truly,

CAB/MJL attachment:

1. Procedure 10-S-01-30

cc: (See Next Page)

GNRO-2004/00020 Page 2 of 2

CC:

Hoeg	T. L.	(GGNS Senior Resident)	(w/a)
Levanway	D. E.	(Wise Carter)	(w/a)
Reynolds	N. S.		(w/a)
Smith	L. J.	(Wise Carter)	(w/a)
Thomas	H. L.		(w/o)

U.S. Nuclear Regulatory Commission	ALL LETTERS
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U.S. Nuclear Regulatory Commission	ALL LETTERS – U.S.
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Washington, D.C. 20555-0001	

### PLANT OPERATIONS MANUAL

Volume 10

Section 01

10-S-01-30 Revision: 12 Date: 2/24/04

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# EMERGENCY PLAN PROCEDURE

# TECHNICAL SUPPORT CENTER (TSC) OPERATIONS

# SAFETY RELATED

Prepared:	Tiched fuell ( Greateal B. Green
Reviewed:	Tectmica
Concurred:	Rel
OSRC:	Manager, Operations M.A.K.Rupa
Approved: _	ABroil Educion Manader Emergency Preparedness
	fant Scholal Hanager

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List of Effective Pages:

Pages 1-11

List of TCNs Incorporated:

Revision	TCN		
0	None		
1	None		
2	1,2		
3	3		
4	4		
5-12	None		

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Title:	Technical Support	No.: 10-S-01-30	Revision: 12	Safety
L	Center (TSC) Operations	L		Evaluation

### I. OVERVIEW / SIGNATURES

Facility: Grand Gulf Nuclear Station

Document Reviewed: 10-S-01-30 Change/Rev.: 12

System Designator(s)/Description: N/A

### **Description of Proposed Change**

As a result of Licensing Amendment 158, procedure 10-S-01-35 (Core Damage Assessment) has been revised to remove the requirement for PASS sampling. Step 2.2.4 of this procedure is deleted to remove this requirement.

Grammatical changes.

If the proposed activity, in its entirety, involves any one of the criteria below, check the appropriate box, provide a justification/basis in the Description above, and forward to a Reviewer. No further 50.59 Review is required. If none of the criteria is applicable, continue with the 50.59 Review.

The proposed activity is editorial/typographical as defined in Section 5.2.2.1.

The proposed activity represents an "FSAR-only" change as allowed in Section 5.2.2.2\_\_\_\_\_. (Insert item # from Section 5.2.2.2).

If further 50.59 Review is required, check the applicable review(s): (Only the sections indicated must be included in the Review.)

SCREENING	Sections I, II, III, and IV required
50.59 EVALUATION EXEMPTION	Sections I, II, III, IV, and V required
50.59 EVALUATION (#: )	Sections I, II, III, IV, and VI required

Preparer:	A: chang Summall / Antral Junder / EDI/EP / 2/12/04
Reviewer:	Name (print) / Signature / Company / Department / Date Richard Van Den Akker (EOI/EP / 2-12-04)
	Name (print) / Signature / Company / Department / Date
OSRC	N/A
	Chairman's Name (print) / Signature / Date [Required only for Programmatic Exclusion Screenings (see Section 5.9) and 50.59 Evaluations.]
List of Assi	sting/Contributing Personnel:
Name:	Scope of Assistance:
<u>N/A</u>	<u>N/A</u>

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Title: Technical Support	No.: 10-S-01-30	Revision: 12	Safety
Center (TSC) Operations	······································		Evaluation

### II. SCREENING

### A. Licensing Basis Document Review

# 1. Does the proposed activity impact the facility or a procedure as described in any of the following Licensing Basis Documents?

Operating License	YES	NO	CHANGE # and/or SECTIONS IMPACTED
Operating License		Ø	
TS			
NRC Orders		⊠	

If "YES", obtain NRC approval prior to implementing the change by initiating an LBD change in accordance with NMM LI-113 (Reference 2.2.13). (See Section 5.1.13 for exceptions.)

LBDs controlled under 50.59	YES	NO	CHANGE # and/or SECTIONS IMPACTED
FSAR		Ø	
TS Bases		Ø	
Technical Requirements Manual			
Core Operating Limits Report		$\boxtimes$	
NRC Safety Evaluation Reports <sup>1</sup>			

If "YES", perform an Exemption Review per Section V <u>OR</u> perform a 50.59 Evaluation per Section VI <u>AND</u> initiate an LBD change in accordance with NMM LI-113 (Reference 2.2.13).

	And and a second s		
LBDs controlled under other regulations	YES	NO	CHANGE # (if applicable) and/or SECTIONS IMPACTED
Quality Assurance Program Manual <sup>2</sup>		⊠	
Emergency Plan <sup>2</sup>			
Fire Protection Program <sup>3</sup> (Includes the Fire Hazards Analysis)		⊠	
Offsite Dose Calculation Manual <sup>3</sup>		$\boxtimes$	
If WTON and the and then see in accord	an a suith Al		andete regulation AND initiate on LPD shance in accordance with

If "YES", evaluate any changes in accordance with the appropriate regulation <u>AND</u> initiate an LBD change in accordance with NMM LI-113 (Reference 2.2.13).

2. Does the proposed activity involve a test or experiment not described in the FSAR?

] Yes ☑ No

Yes

No

N/A

If "yes," perform an Exemption Review per Section V <u>OR</u> perform a 50.59 Evaluation per Section VI.

Does the proposed activity potentially impact equipment, procedures, or facilities utilized for storing spent fuel at an independent Spent Fuel Storage Installation? (Check "N/A" if dry fuel storage is not applicable to the facility.)
 If "yes," perform a 72.48 Review in accordance with NMM Procedure LI-112.

(See Sections 1.5 and 5.3.1.5 of the EOI 10CFR50.59 Review Program Guidelines.)

<sup>&</sup>lt;sup>1</sup> If "YES," see Section 5.1.4. No LBD change is required.

<sup>&</sup>lt;sup>2</sup> if "YES," notify the responsible department and ensure a 50.54 Evaluation is performed. Attach the 50.54 Evaluation.

<sup>&</sup>lt;sup>3</sup> If "YES," evaluate the change in accordance with the requirements of the facility's Operating License Condition.

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EMERGENCY PLAN PROCEDURE

Title: I	echnical Support	No.:	10-5-01-30	Revision:	12	Safety
c	Center (TSC) Operations					Evaluation

### B. Basis

Provide a clear, concise basis for the answers given in the applicable sections above. Explain why the proposed activity does or does not impact the Operating License/Technical Specifications and/or the FSAR and why the proposed activity does or does not involve a new test or experiment not previously described in the FSAR. Adequate basis must be provided within the Screening such that a third-party reviewer can reach the same conclusions. Simply stating that the change does not affect TS or the FSAR is not an acceptable basis. See EOI 50.59 Guidelines Section 5.6.6 for guidance.)

Performed keyword searches of the online Operating License, TechSpecs, NRC Orders, UFSAR, TS Bases, TRM, COLR, SERs, QAPM, Emergency Plan, Fire Protection Program, and ODCM for the keywords "core damage", "core damage assessment" and "TSC Coordinator". Reviewed all hits returned. Only the following items were relevant to this change.

UFSAR Section 7.7.1.11.4.2 describes the PASS system and design criteria, but does not specify that the system be used for core damage assessment. This change does not affect the ability of the PASS system to meet the design criteria.

UFSAR Section 13.1.2.3.11 describes the duties of the Shift Technical Assistant and includes monitoring for core damage. The duties of the STA are transferred in part to the TSC Coordinator with activation of the TSC. This change does not affect the on-shift duties of the Shift Technical Assistant.

UFSAR Section 18 describes the responses to TMI related requirements in NUREG-0737. Section 18.1.21 describes the Design Review performed for operation of the PASS System during postaccident conditions and lists several time requirements for performing PASS samples during the Design Review. Section 18.1.21 does not specify that the PASS System be used for performing core damage assessment.

This change does not represent a change to any Licensing Bases Document or system, structure or component described in the UFSAR.

# C. <u>References</u>

Discuss the methodology for performing the LBD search. State the location of relevant licensing document information and explain the scope of the review such as electronic search criteria used (e.g., key words) or the general extent of manual searches per Section 5.3.6.4 of LI-101. NOTE: Ensure that electronic and manual searches are performed using controlled copies of the documents. If you have any questions, contact your site Licensing department.

LBDs/Documents reviewed via keyword search: Operating License, TechSpecs, NRC Orders, UFSAR, TS Bases, TRM, COLR, SERs, QAPM, Emergency Plan, Fire Protection Program, and ODCM Keywords:

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core damage, core damage assessment, TSC Coordinator

LBDs/Documents reviewed manually:

UFSAR Sections 7.7.1.11.4.2, 13.1.2.3.11, and 18.1.21

D. Is the validity of this Review dependent on any other change? (See Section 5.3.4 of the EOI 10CFR50.59 Program Review Guidelines)

	Yes
$\boxtimes$	No

If "Yes," list the required changes. N/A

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Title:	Technical Support	No.: 10-S-01-30	Revision: 12	Safety
	Center (TSC) Operations			Evaluation

# III. ENVIRONMENTAL SCREENING

If any of the following questions is answered "yes," an Environmental Review must be performed in accordance with NMM Procedure EV-115, "Environmental Evaluations," and attached to this 50.59 Review. Consider both routine and non-routine (emergency) discharges when answering these questions.

Will the proposed Change being evaluated:

	Yes	<u>No</u>	
1.		⊠	Involve a land disturbance of previously disturbed land areas in excess of one acre (i.e., grading activities, construction of buildings, excavations, reforestation, creation or removal of ponds)?
2.		$\boxtimes$	Involve a land disturbance of undisturbed land areas (i.e., grading activities, construction, excavations, reforestation, creating, or removing ponds)?
3.		$\boxtimes$	Involve dredging activities in a lake, river, pond, or stream?
4.		$\boxtimes$	Increase the amount of thermal heat being discharged to the river or lake?
5.		⊠	Increase the concentration or quantity of chemicals being discharged to the river, lake, or air?
6.		$\boxtimes$	Discharge any chemicals new or different from that previously discharged?
7.		$\boxtimes$	Change the design or operation of the intake or discharge structures?
8.		⊠	Modify the design or operation of the cooling tower that will change water or air flow characteristics?
9.			Modify the design or operation of the plant that will change the path of an existing water discharge or that will result in a new water discharge?
10.		$\boxtimes$	Modify existing stationary fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)? <sup>1</sup>
11.		$\boxtimes$	Involve the installation of stationary fuel burning equipment or use of portable fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)? <sup>1</sup>
12.		$\boxtimes$	Involve the installation or use of equipment that will result in an air emission discharge?
13.		$\boxtimes$	Involve the installation or modification of a stationary or mobile tank?
14.		⊠	Involve the use or storage of oils or chemicals that could be directly released into the environment?
15.		$\boxtimes$	Involve burial or placement of any solid wastes in the site area that may affect runoff, surface water, or groundwater?

<sup>1</sup> See NMM Procedure EV-117, "Air Emissions Management Program," for guidance in answering this question. J:\Adm\_srvs\TECH\_PUB\REVISION\10\10S0130.doc

Title: Technical Sup	port	No.:	10-5-01-30	Revision:	12	Safety
Center (TSC)	Operations		<b>.</b>	<u> </u>		Evaluation

# IV. SECURITY PLAN SCREENING

If any of the following questions is answered "yes," a Security Plan review must be performed by the Security Department to determine actual impact to the Plan and the need for a change to the Plan.

A. Could the proposed activity being evaluated:

	<u>Yes</u>	<u>No</u>					
1.		⊠	Add, delete, modify, or otherwise affect Security department responsibilities (e.g., including fire brigade, fire watch, and confined space rescue operations)?				
2.		$\boxtimes$	Result in a breach to any security barrier(s) (e.g., HVAC ductwork, fences, doors, walls, ceilings, floors, penetrations, and ballistic barriers)?				
<b>3</b> .		$\boxtimes$	Cause materials or equipment to be p	laced o	r installed within the Security Isolation Zone?		
4.		⊠	Affect security lighting by adding or de facilities?	eleting li	ights, structures, buildings, or temporary		
5.		$\boxtimes$	Modify or otherwise affect the intrusic optics)?	n detec	tion systems (e.g., E-fields, microwave, fiber		
6.			Modify or otherwise affect the operati	on or fie	eld of view of the security cameras?		
7.			Modify or otherwise affect (block, move, or alter) installed access control equipment, intrusion detection equipment, or other security equipment?				
8.			Modify or otherwise affect primary or secondary power supplies to access control equipment, intrusion detection equipment, other security equipment, or to the Central Alarm Station or the Secondary Alarm Station?				
9.		$\boxtimes$	Modify or otherwise affect the facility's security-related signage or land vehicle barriers, including access roadways?				
10.		⊠	Modify or otherwise affect the facility's telephone or security radio systems?				
Th	e Seci	urity D	epartment answers the following qu	estions	; if one of the questions was answered "yes"		
B	. Is th pro	ne Sec posed	urity Plan actually impacted by the activity?		Yes No		
С	C. Is a change to the Security Plan required?  Yes Change # (optional) No				Yes Change # (optional) No		
N/A							
Nam	e of S	ecurity	/ Plan reviewer (print) / Signature / D	ate			

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EMERGENCY PLAN PROCEDURE

Title: Technical Support	No.: 10-5-01-30	Revision: 12	Emergency Plan
Center (TSC) Operations		<u>l</u>	Evaluation

# ATTACHMENT 9.1

10CFR50.54(q) SCREENING

# 1. DOCUMENT INFORMATION

Procedure/Document Number:10-S-01-30	Proc./Doc. Revision: 12
Document Title: Technical Support Center (TSC) Operat	ions
Brief Description of Proposed Revision:	
Deletes the requirement for initiating PASS Samples per	10-S-01-35.
Grammatical changes.	

# 2. SCREENING

- A.) Does the proposed revision require a change to the Emergency Plan, change a commitment in the E-plan, or potentially decrease the effectiveness of the E-plan?
   Yes x No
- B.) Does the proposed revision change the site Emergency Action Levels (EALs)? \_\_\_\_Yes \_\_x\_ No

If the answer to either question is YES, then a 10CFR50.54(q) evaluation must be performed. See attachment 9.2. If the answer is NO provide justification below.

# 3. Justification for "NO" Answers

Section 7.6.4 of the emergency plan describes the ability of the PASS system. This system remains in use and is available if required. However, the PASS system is no longer the primary method for estimating core damage or monitoring for core damage. 10-S-01-35 has been revised to incorporate more recent methods that have been developed by the BWR Owners Group and endorsed by the NRC (Document No. NEDC-33045P in Entergy IDEAS system). The change in method provides more timely monitoring of core damage than PASS samples and therefore does not represent a decrease in effectiveness of the Emergency Plan.

The EALs specify some coolant activity levels that are obtained by using the PASS System. The PASS System remains available for use for this purpose and therefore does not modify the EALS.

# 4. APPROVAL

Screening Prepared By:	Antal Sunfel	2/12/04
Screening Reviewed By.	Signature	Date 2-12-04
Screening Approved By:	M.J.Signature Signature	Date <u>Z-18-04</u> Date

J:\Adm\_srvs\TECH\_PUB\REVISION\10\10s0130.doc

EMERGENCY PLAN PROCEDURE

Title:	Technical Support	No.: 10-S-01-30	Revision: 12	Page: i
	Center (TSC) Operations	l		

RPTS FORM					
10CFR50.59 Review Required?	(X) Yes	If Yes,	attach 50.59 Review Form		
	( ) No	Not rec	uired per LI-101		
Cross-Discipline review requir	red?	(X) Yes	(Note affected Departments		

 Below)

 ( )

 No

 Preparer Initials>>>

Department Cross-Discipline Reviews Needed	Signoff
	(signed, electronic, telcon)
TSC COORDINATOR	the bate

Does this directive contain Tech Spec Triggers? () YES (X) NO

REQUIREMENTS CROSS-REFERENCE LIST

Requirement	by Directive Paragraph	Directive Paragraph Number
Implemented Name	Number	That Implements Requirement
GGNS Emergency Plan	7.3.1.S2 & S16	1.2.2
GGNS Emergency Plan	7.3.1 S11	6.4
GGNS Emergency Plan	7.3.1 S12, S13, S14 &	6.1.1
	S15	
GGNS Emergency Plan	6.1.2 S1,S2	6.2.2.a (Note)
GGNS Emergency Plan	5.4.2a & c	6.2.1a,b,c
GGNS Emergency Plan	5.4.2b,d,e,f,g	6.2.2a,b,c,d,e
GGNS Emergency Plan	5.4.3	2.6
GGNS Emergency Plan	5.4.6	2.2
GGNS Emergency Plan	5.4.8	2.4
GGNS Emergency Plan	5.4.9	2.5
GGNS Emergency Plan	5.4.10	2.3
GGNS Emergency Plan	5.4.33	2.7.1
GGNS Emergency Plan	6.2.4.58	6.1.1.a(1)
GNRO-97/00113	97-15-02.ITEM 2	6.2.2.p, 6.2.5.a(10)

\* Covered by directive as a whole or by various paragraphs of the directive.

### NOTE

The Component Database Change Request statement is applicable only to Volume 06 and 07 maintenance directives.

Component Database Change Request generated and the backup documentation available for setpoint and/or calibration data only  $\Box$  Yes 🗷 N/A CDBCR #

#### Current Revision Statement

Revision 12:

- As a result of Licensing Amendment 158, procedure 10-S-01-35 (Core Damage Assessment) has been revised to remove the requirement for PASS sampling. Step 2.2.4 of this procedure is deleted to remove this requirement.
- Grammatical changes.

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Title:	Technic	al Su	pport	No.:	10-5-01-30	Revision:	12	Page:	1
	Center	(TSC)	Operations	<u> </u>		1		L	

# TABLE OF CONTENTS

			Page
1.0	PURP	OSE AND DISCUSSION	2
2.0	RESP	ONSIBILITIES	2
3.0	REFE	RENCES	4
4.0	ATTA	CHMENTS	4
5.0	DEFI	NITIONS	4
6.0	DETA	ILS	5
	6.1	TSC Activation	5
	6.2	TSC Operation	б
		6.2.1 Emergency Director Activities	6
		6.2.2 Emergency Director or Designee Activities	7
		6.2.3 TSC Communicator	8
		6.2.4 TSC Communications Personnel	8
		6.2.5 Radiation Protection Manager	8
	6.3	Information Specialist	9
	6.4	Emergency Power Source	9
7.0	BACK	UP TSC	9
	7.1	Location	9
	7.2	Activation	9
	7.3	Setup	10
	7.4	Staffing	10
	7.5	Operation	11
8.0	RECO	ORDS AND INFORMATION	11

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Title:	Technical Support	No.: 10-S-01-30	Revision: 12	Page: 2
	Center (TSC) Operations			

### 1.0 PURPOSE AND DISCUSSION

#### 1.1 Purpose

1.1.1 To provide general instructions for the Technical Support Center, including personnel responsibilities and staffing.

### 1.2 Discussion

- 1.2.1 This procedure should be used by personnel in the TSC to coordinate and control Emergency Operations.
- 1.2.2 The TSC personnel primarily assist in accident assessment, provide advice to the Control Room and communicate with EOF personnel regarding plant conditions and actions. The TSC performs the function of the EOF if the EOF/BEOF are unavailable.

### 2.0 RESPONSIBILITIES

#### NOTE

The Emergency Director must turn over responsibilities to a qualified individual before leaving the TSC when he/she has responsibility for Emergency Direction and Control (i.e. the Emergency Director must be available immediately to make Protective Action Recommendations (PARs) and make decisions relating to notification of offsite authorities).

- 2.1 The <u>Emergency Director</u> is responsible for implementing the Emergency Plan and procedures, as appropriate, and
  - 2.1.1 Augmentation of the ERO after the TSC is operational.
  - 2.1.2 Briefing the NRC Incident Response Team leader.

#### NOTE

Personnel who must leave the TSC for any reason must inform their immediate supervisor of their destination, and estimated time of return. They must also consult with the Radiation Protection Manager for radiological conditions and route of travel. Before returning to the TSC, they must again consult with the Radiation Protection Manager for radiological condition and route of travel.

- 2.1.3 Acting as point of contact for security during accountability checks.
- 2.2 The TSC Coordinator reports to the Emergency Director.
  - 2.2.1 Responsible for the assimilation of data for the Emergency Director.
  - 2.2.2 Prioritization of corrective action, core/thermal hydraulics, and coordination of mitigation efforts.
  - 2.2.3 Responsible for monitoring plant conditions for indication of core damage.

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Title:	Technical Support	No.: 10-S-01-30	Revision: 12	Page: 3
	Center (TSC) Operations			

- 2.3 The <u>Radiation Protection Manager</u> reports directly to the Emergency Director and is responsible for:
  - 2.3.1 Radiological assessments and the development of radiological plans.
  - 2.3.2 Keeping the Emergency Director informed of the environmental conditions.
  - 2.3.3 Determining emergency radiological survey requirements.
  - 2.3.4 Initiating and maintaining communication with the NRC (upon request).

NOTE

A Health Physics Qualified person normally assists the Radiation Protection Manager in the Technical Support Center.

- 2.4 The Technical Manager reports directly to the Technical Support Center Coordinator and is responsible for:
  - 2.4.1 The activities of the Engineers and Technical Staff.
  - 2.4.2 Providing information concerning plant status and developing recommendations and procedures for plant operation.
  - 2.4.3 Activating the VIP 2000 when directed.
- 2.5 The <u>Record Document Manager</u> reports directly to the Technical Support Center Coordinator and provides administrations and logistical support.
- 2.6 The <u>TSC Communicator</u> reports directly to the Emergency Director and is responsible for:
  - 2.6.1 Initiation and completion of the Emergency Notification Form.
  - 2.6.2 Notification of designated personnel per 10-5-01-6, Notification of Offsite Agencies and Plant On-Call Emergency Personnel (if necessary).
  - 2.6.3 Operation of TSC communications equipment.
- 2.7 The Information Specialist is located in the TSC and is responsible for:
  - 2.7.1 Collection and transmission of technically accurate information to the Company Spokesperson, or designee.
- 2.8 The Radiological Assessment Dose Calculator TSC reports to the RPM and is responsible for:
  - 2.8.1 Offsite dose calculations.
  - 2.8.2 Updating the TSC radiological status board and the plume tracking map.
  - 2.8.3 Assisting in HPN communications (when requested).

J:\Adm\_srvs\TECH\_PUB\REVISION\10\10S0130.doc

Title:	Technical Support	No.: 10-S-01-30	Revision: 12	Page: 4
	Center (TSC) Operations			

- 2.9 <u>HEALTH PHYSICS QUALIFIED PERSONNEL</u> report to the RPM and are responsible for:
  - 2.9.1 Control Room Envelope habitability surveys (including TSC and Control Room areas), when requested.
  - 2.9.2 Setting up Frisker stations at TSC and Control Room entrance (when required).
  - 2.9.3 Assisting in HPN communications (when requested).
- 2.10 TSC Coordinator Assistant (TCA)

The TSC Coordinator Assistant reports to the TSC Coordinator and is responsible for monitoring the progress of the implementation of Emergency Operating Procedures, providing plant status and corrective action status to the TSC, and communication of emergency information to the OSC, Control Room, and EOF.

### 3.0 REFERENCES

- 3.1 GGNS Emergency Plan
- 3.2 10-S-01-35, Core Damage Assessment
- 3.3 10-S-01-22, Recovery
- 3.4 10-S-01-23, Reentry
- 3.5 10-S-02-3, Emergency Preparedness Form Control
- 4.0 ATTACHMENTS

None

NOTE

Checklists are performance aids; they are intended to assist and aid ERO personnel in performance of their tasks. Except when specifically noted, completion of checklists is not mandatory. The forms are located in storage bins and the appropriate checklists at the position's desk in the facility.

### 5.0 DEFINITIONS

- 5.1 TSC Technical Support Center
- 5.2 OEC Offsite Emergency Coordinator
- 5.3 EOF Emergency Operations Facility
- 5.4 PA Public Address
- 5.5 RPM Radiation Protection Manager
- 5.6 HPN Health Physics Network
- 5.7 SRAO State Radiological Assessment Officer
- 5.8 PAR Protective Action Recommendation
- 5.9 OCC Outage Control Center

### J:\Adm srvs\TECH\_PUB\REVISION\10\10S0130.doc

Title:	Technical Su	pport	No.:	10-S-01-30	Revision:	12	Page:	5
	Center (TSC)	Operations						

- 5.10 OHL Operational Hot Line
- 5.11 ENS Emergency Notification System
- 5.12 EPP Emergency Plan Procedure
- 5.13 ESF Engineering Safety Features
- 5.14 NRC Nuclear Regulatory Commission
- 5.15 REM Radiation Emergency Manager
- 5.16 IS Information Specialist
- 5.17 BEOF Backup EOF
- 5.18 ED Emergency Director
- 5.19 KI Potassium Iodide
- 5.20 EAL Emergency Action Level
- 5.21 <u>AUGMENTATION</u> Action taken to support on-shift personnel prior to emergency facilities becoming operational.

### 6.0 DETAILS

- 6.1 TSC Activation
  - 6.1.1 The TSC may be activated at any time and shall be activated at an Alert, Site Area Emergency or General Emergency. Once activated the TSC shall become operational as soon as possible (without delay). When facility staffing can be accomplished with onsite personnel, it is the goal to become operational within 45 minutes. Otherwise offsite personnel shall provide shift augmentation (of the Emergency Director, TSC Coordinator, TSC Communicators (2) and Radiological Assessment Dose Calculator positions) in 75 minutes and be fully operational in 90 minutes.
    - a. The On-Call Manager performs the following actions during TSC activation:
      - Receives turnover briefing from Emergency Director in Control Room and verifies that correct emergency classification has been declared.
      - (2) Sign in and ensure that ED/TSC Coordinators Log is initiated and all information relevant to the event is recorded.
      - (3) Check sign in board. Ensure minimum required staffing is present as follows:
        - (a) One Emergency Director
        - (b) One TSC Coordinator
        - (c) One of the following:

- 1) RPM
- 2) Radiological Assessment Dose Calculator (TSC)

(d) Two communicators

Title:	Technical Support	No.: 10-S-01-30	Revision: 12	Page: 6
	Center (TSC) Operations			

6.1.1 (Cont.)

- (4) Brief all <u>TSC personnel</u> on initiating conditions, current plant status, and radiological information.
- (5) Ensure TSC communicators are aware of time for next Emergency Notification.
- (6) Ensure communications are established with the Control Room, OSC, and EOF.
- (7) Announce that TSC is operational to all TSC personnel and that On-Call Manager has assumed the Emergency Director position.
- (8) Inform Control Room and OSC that TSC is operational and that On-Call Manager has assumed the Emergency Director position.

# 6.1.2 <u>Radiation Protection Manager</u> performs the following actions during TSC activation:

- a. Sign in and ensure that the RPM Log is initiated.
- b. Ensure TSC habitability checks are performed, as appropriate.
- c. Establish communications with OSC HP Coordinator.
- d. Establish contamination controls for TSC and Control Room (if necessary).
- e. Announce habitability status of facility.
- 6.2 TSC Operation
  - 6.2.1 The <u>Emergency Director</u> shall perform the following actions during the course of an emergency:
    - a. Assess and classify the emergency, especially where real or potential hazards exist to offsite personnel or property.
    - b. Notify and recommend protective actions to authorities responsible for offsite emergency measures.
    - c. Transfer Notifications, Protective Action Recommendations, Emergency Classification, and Offsite Radiological Assessment to the Offsite Emergency Coordinator when the EOF is declared operational.
    - d. Authorize Emergency Radiation Exposures (if necessary).

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Title:	Technical Support	No.: 10-S-01-30	Revision: 12	Page: 7
	Center (TSC) Operations			_

- 6.2.2 The <u>Emergency Director</u> or his designee performs the following actions during the course of an emergency:
  - a. Makes operational decisions and recommendations to the Control Room involving the safety of the plant and its personnel.

NOTE

In the event of Security emergencies, each Security related incident should be evaluated. Only those support groups and facilities which are needed should be activated, regardless of the emergency classification, to minimize the risk to personnel.

- b. Implements the GGNS Emergency Plan through use of the Emergency Plan Procedures.
- c. Requests additional resources as deemed necessary up to and including activation of the Emergency Organization as required.
- d. Notifies and informs the Offsite Support Officials of changing plant conditions and developments.
- e. Requests assistance from Federal and State Agencies, if required. (OEC assumes this responsibility after EOF is operational.)
- f. Maintains overall responsibility for the operation of the plant.
- g. Ensures that emergency or medical assistance is provided to all personnel on company property (especially during a Limited or Site Evacuation).
- h. Ensure extended shift manning is discussed and authorized.
- i. Ensure that RPM contacts MS and LA SRAO's with initial information and if SRAO TRIGGER POINTS are reached.
- j. Ensure that periodic notifications to plant personnel are made concerning plant status and expected personnel actions.
- k. Ensure that RPM contacts State SRAO's within 30 minutes of issuing a PAR to ensure that the SRAO understands the basis for the PAR.
- 1. Ensure that announcement is made if another person assumes position of ED.
- m. Authorize use of KI (if necessary).
- n. Direct recovery actions if EOF is not operational.
- o. Continuously review plant parameters for EAL changes, and inform OEC when classification change may be necessary.
- p. If an evacuation of affected areas of the plant is required, performance is in accordance with 10-S-01-11.

ſ	Title:	Technic	cal Su	pport	No.:	: 10-S-01-30	Revision:	12	Page:	8
I		Center	(TSC)	Operations						

6.2.3 The TSC Communicator assumes the duty for communications/notifications to the offsite agencies after TSC activation. Refer to EPP 10-S-01-6, Notification of Offsite Agencies and Plant On-Call Emergency Personnel for additional information.

NOTE

The <u>Emergency Operations Facility (EOF) Communicator</u> assumes the duty for communications/notifications to the offsite agencies after the EOF/BEOF is operational.

- 6.2.4 <u>TSC Communications personnel</u> normally transmit copies of current notification forms to designated offsite agencies via facsimile after TSC activation.
  - a. Previous notification forms read by Control Room communicator via the Operational Hot Line (OHL) are normally sent via fax when time allows.
- 6.2.5 <u>Radiation Protection Manager</u> performs the following:
  - a. Offsite Dose Determination
    - (1) Perform offsite dose projections and update Emergency Notification Form.
    - (2) Determine affected sectors.
    - (3) Recommend Protective actions if necessary (Required for General Emergency) (See 10-S-01-12)
    - (4) Ensure Radiological/MET data is posted on status boards.
    - (5) Display affected sectors on wall map.
    - (6) Update OSC HP Coordinator on Radiological and MET data.
    - (7) Direct OSC HP Coordinator to dispatch Offsite monitoring teams (if necessary).
    - (8) Direct OSC HP Coordinator to perform site boundary survey.
    - (9) Review Radiological EAL's and confer with ED on EAL's as necessary.
    - (10) Ensure radiological monitoring is provided for manned areas (i.e. Chemistry Lab) of the plant after a site evacuation.
  - b. In-Plant Radiological Evaluation

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- (1) Determine in-plant radiological hazards.
- (2) Confer with OSC HP Coordinator on precautions, exposure control methods, and protective equipment for response teams.
- (3) Map affected areas using available radiological data.

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Title:	Technical Support	No.: 10-S-01-30	Revision: 12	Page: 9
	Center (TSC) Operations			

- 6.2.5 (Cont.)
  - c. <u>Reentry</u>
    - (1) Evaluate measures to restore radiological access to affected plant areas.
  - d. TSC Deactivation
    - (1) Ensure any contaminated material from TSC/Control Room habitability surveys or radiological control points are handled and stored properly.

### 6.3 Information Specialist (IS)

- 6.3.1 On arrival at the TSC, the IS sets up telephone contact with the Company Spokesperson or designee.
- 6.4 Emergency Power Sources

6.4.1 The TSC emergency lighting is powered by the ESF AC buses, with backup emergency lighting provided by battery pack lighting units.

### 7.0 BACKUP TSC

- 7.1 Location
  - 7.1.1 The Backup TSC is located in the Outage Control Center (OCC) which is in the M&E Building.
- 7.2 Activation
  - 7.2.1 If the TSC is not habitable or cannot perform its required functions, the Emergency Director directs the activation of the Backup TSC.
  - 7.2.2 When relocating personnel from the TSC to the Backup TSC, the ED,
    - a. Contacts the OEC and inform him/her of the situation (if EOF is operational.)
    - b. Contacts the Control Room, OSC, Security, and Company Spokesperson.
    - c. Transfers the following functions to the Control Room.
      - (1) Command and Control
      - (2) Communication with federal, state, and local agencies (If the EOF is not operational)
      - (3) Response team direction
      - (4) Emergency Classification/Assessment (If the EOF is not operational)
    - d. Dispatch Radiological Assessment Dose Calculator (TSC) to Control Room to perform dose assessment.
    - e. If radiological conditions exist, request from the Radiation Protection Manager, a determination of requirements (i.e. dosimetry, protective clothing) for relocation.

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Title:	Technical Support	No.:	10-S-01-30	Revision:	12	Page:	10
	Center (TSC) Operations						

- 7.2.2 (Cont.)
  - f. Ensures the offsite agencies supporting the emergency response and all Emergency Response Facilities are notified of move.
  - g. Ensures all logbooks, current paperwork, and position badges are taken to Backup TSC.
- 7.2.3 Prior to leaving the TSC, the TSC Communicator should:
  - a. Contact the Control Room Communicator and EOF Communicator to discuss the status of the current notifications for federal, state, and local agencies.
  - b. Transfer responsibilities for notifications of federal, state, and local agencies to the EOF, if the EOF is not operational and responsible for notification, then transfer notification to the Control Room.

#### 7.3 Setup

- 7.3.1 Upon arrival at the Backup TSC, the Emergency Director ensures that the Backup TSC is setup using the BACKUP TSC CHECKLIST (Form EPP 30-11).
- 7.3.2 The blackboard is used to display information normally displayed on the TSC Status boards.
- 7.3.3 The Emergency Director upon arrival:
  - a. Ensure the Backup TSC is setup in accordance with the checklist.
  - b. Review Backup TSC Staffing Requirements (Form EPP 30-10), and ensure the Backup TSC is staffed appropriately.
- 7.3.4 The Radiation Protection Manager upon arrival:
  - a. Ensures facility is habitable.
  - b. Ensures the Radiological Assessment Dose Calculator (TSC) relocates and verifies the Dose Calculator computer is operable.
  - c. Obtains radiological conditions from Dose Calculator.
  - d. Briefs the ED on Radiological Assessment Status.

# 7.4 Staffing

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7.4.1 The Backup TSC is staffed in accordance with the Backup TSC staffing requirements (Form EPP 30-10).

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7.4.2 The Radiological Assessment Dose Calculator (TSC) performs dose calculations in the Control Room. The Radiological Assessment Dose Calculator (EOF) performs dose calculations in the EOF.

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Title:	Technical Support	No.: 10-S-01-30	Revision: 12	Page: 11
	Center (TSC) Operations			

# 7.5 Operation

7.5.1 The ED declares the Backup TSC operational when:

- a. Sufficient personnel are present to man the Backup TSC staffing requirements.
- b. Advised by the RPM that the Backup TSC is ready to perform Radiological Assessment.
- c. Advised by the TSC Coordinator that the Backup TSC is ready to take command and control of the emergency.
- 7.5.2 After declaring the Backup TSC operational:
  - a. Transfer the following functions from Control Room to the TSC.
    - (1) Command and Control
    - (2) Response Team Direction
    - (3) Emergency Classification Assessment
    - (4) Communication with federal, state, and local agencies (If the EOF is not operational)

#### 8.0 RECORDS AND INFORMATION

8.1 Forms and paperwork generated by this procedure during <u>EMERGENCIES</u> are retained for information, event reconstruction and submitted to the Manager, Emergency Preparedness.