

Dominion Nuclear Connecticut, Inc.
Millstone Power Station
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Waterford, CT 06385



Dominion

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U.S. Nuclear Regulatory Commission
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Washington, DC 20555

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DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNITS 1, 2 AND 3
REVISED EMERGENCY PLAN PROCEDURES

In accordance with 10 CFR 50, Appendix E, Dominion Nuclear Connecticut, Inc. hereby notifies the U.S. Nuclear Regulatory Commission that the following Emergency Plan procedures have been implemented:

- MP-26-EPI-FAP04, "Emergency Operations Facility Activation and Operation," Major Revision 2, Minor Revision 0, transmitted via Attachment 1;
- MP-26-EPI-FAP04-001, "Director of Station Emergency Operations (DSEO)," Major Revision 2, Minor Revision 0, transmitted via Attachment 2;
- MP-26-EPI-FAP04-002, "Assistant Director Emergency Operations Facility (ADEOF)," Major Revision 1, Minor Revision 0, transmitted via Attachment 3;
- MP-26-EPI-FAP04-011, "Manager of Resources (MOR)," Major Revision 2, Minor Revision 0, transmitted via Attachment 4;
- MP-26-EPI-FAP05, "State Emergency Operations Center (EOC) Activation and Operation," Major Revision 2, Minor Revision 0, transmitted via Attachment 5;
- MP-26-EPI-FAP05-001, "Chief Technical Spokesperson (CTS)," Major Revision 2, Minor Revision 0, transmitted via Attachment 6;
- MP-26-EPI-FAP05-002, "Technical Assistant (TA)," Major Revision 2, Minor Revision 0, transmitted via Attachment 7;

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- MP-26-EPI-FAP05-003, "Nuclear News Manager (NNM)," Major Revision 2, Minor Revision 0, transmitted via Attachment 8;
- MP-26-EPI-FAP05-005, "Media Center Liaison (MCL)," Major Revision 2, Minor Revision 0, transmitted via Attachment 9;
- MP-26-EPI-FAP05-008, "State Emergency Planning Liaison (SEPL)," Major Revision 1, Minor Revision 0, transmitted via Attachment 10.

If you have any questions or require additional information, please contact Mr. David W. Dodson at (860) 447-1791, extension 2346.

Very truly yours,


J. Alan Price
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Attachments: 10

Commitments made in this letter: None.

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Attachment 1

**Emergency Procedures Implementing (EPI)
Functional Administrative Procedure (FAP)
MP-26-EPI-FAP04, "Emergency Operations Facility Activation and Operation"**

**Millstone Power Station Units 1, 2 and 3
Dominion Nuclear Connecticut, Inc. (DNC)**

**Functional
Administrative
Procedure**



**Emergency Operations Facility Activation and
Operation**

MP-26-EPI-FAP04

Rev. 002

Approval Date: 3/4/04

Effective Date: ~~3/4/04~~⁰⁵ 3/12/04



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MP-26-EPI-FAP04-014, "Technical Information Communicator (TIC)"
MP-26-EPI-FAP04-015, "EOF Emergency Communicator"
MP-26-EPI-FAP04-016, "Station Emergency Preparedness Representative (SEPR)"
MP-26-EPI-FAP04-017, "Regulatory Liaison"

1. PURPOSE

1.1 Objective

This procedure provides guidance to Station Emergency Response Organization (SERO) personnel who report to the Emergency Operations Facility (EOF) during an event.

1.2 Applicability

Activation of the EOF is initiated upon declaration of an ALERT, Posture Code Charlie-One, or higher event.

1.3 Supporting Documents

EPI-FAP01, "Control Room Emergency Operations"

EPI-FAP06, "Classification and PARs"

EPI-FAP07, "Notifications and Communications"

EPI-FAP08, "Evacuation and Assembly"

EPI-FAP09, "Radiation Exposure Controls"

EPI-FAP10, "Dose Assessment"

EPI-FAP11, "Core Damage Assessment"

EPI-FAP13, "News Releases"

EPI-FAP15, "Common Forms"

EPA-REF08B, "Millstone Emergency Plan Resource Book"

Meteorological Reference Manual for Support of Nuclear Plant Emergencies.

NRC Regulatory Issue Summary 2002-21, "National Guard and Other Emergency Responders Located in the Licensee's Controlled Area"

1.4 Discussion

1.4.1 Facility Activation

Facility activation should occur within 60 minutes of the time the SERO was notified. The EOF can be declared activated when the DSEO has relieved the CR-DSEO of command and control responsibilities AND minimum staffing requirements are met.

The EOF DSEO has the discretion to relieve the CR-DSEO and authorize EOF activation with less than minimum staffing provided necessary functional areas are filled. While this is an option, the decision to activate without minimum staffing should only be made after attempting to fill open positions with qualified responders.

1.4.2 The major activities associated with the EOF are as follows:

- Event Classification and PARs - EPI-FAP06
- Event Notification and Communications - EPI-FAP07
- Radiological Dose Assessment/Sampling – EPI-FAP10
- Exposure Control - EPI-FAP09
- Resources – EPI-FAP04
- Rumor Control and News Releases - EPI-FAP13
- Coordination of Outside Agencies
- Recovery - EPI-FAP14

1.4.3 10 CFR 50.54(x) Invocation

- a. As discussed in the Statements of Consideration to 10 CFR Part 50, emergencies can arise during which compliance with a license condition or a Technical Specification could prevent necessary action by the licensee to protect the public's health and safety. Absolute compliance with the license during these emergencies can be a barrier to effective protective action.
- b. Unanticipated circumstances can occur during the course of an emergency which may call for responses different from any previously considered during the course of licensing. Special circumstances requiring a deviation from license requirements are not necessarily limited to transients or accidents not analyzed in the licensing process. Special circumstances can arise during emergencies involving multiple equipment failures or coincident accidents where plant emergency procedures could be in conflict with, or not applicable to, the circumstances. In addition, an accident can take a course different from that which was addressed when the emergency procedure was written, thus requiring a protective response at variance with a procedure required to be followed by the licensee which may ultimately be contrary to current Technical Specifications or the license condition.
- c. 10 CFR 50.54(x) will permit the licensee to take reasonable action in an emergency even though the action departs from licensing conditions or plant Technical Specifications. This action may only be taken, however, if the following criteria are met:
 - The action is immediately needed to protect the public's health and safety, including plant personnel.

- No action consistent with the license conditions and Technical Specifications is immediately apparent that can provide adequate or equivalent protection.
- As a minimum, a licensed senior operator approves the action.

d. Applicability Determination

The NRC can amend Technical Specifications or license conditions. The §50.54(x) regulation is not intended to apply in circumstances where time allows this normal process to be followed. The regulation applies only to those emergency situations in which immediate action is required by the licensee to protect public's health and safety and this action is contrary to a Technical Specification or license condition.

Operating outside the boundaries of approved procedures or in the absence of procedures does not in and of itself meet the threshold for invocation of §50.54(x). Also, the existence of a safety analysis (§50.59) conducted for the purpose of determining whether an unreviewed safety question exists is not sufficient to determine whether application of §50.54(x) is appropriate. §50.54(x) is not intended for use as a general regulatory protective shield for all actions not addressed by current procedures. Even after §50.54(x) has been invoked, each subsequent action taken must be evaluated for §50.54(x) applicability with all necessary approvals and notifications being made for each invocation, as appropriate.

Additionally, the §50.54(x) and (y) amendments were not written for the purpose of establishing procedures and guidance (such as SAMG) that may be useful at some future date (e.g., preplanning and contingency actions). The determination to discontinue following plant operating procedures and/or EOPs, and to begin following SAMG, by itself, does not constitute a departure from a license condition or Technical Specification and, therefore, does not require invocation of §50.54(x). Note however, it is possible that the first action directed during SAMG implementation may actually require §50.54(x) invocation.

The threshold for invocation is met only if the action being taken is not consistent with current license conditions and Technical Specifications. Additionally, the action must meet the time and safety dependent criteria previously discussed. Then and only then should the invocation of §50.54(x) be considered for approval.

e. Approval

A licensed senior operator position is the minimum level within the organization, not the only position, authorized to approve invocation of §50.54(x). 10 CFR 50.54(y) states, "Licensee action permitted by paragraph (x) of this section shall be approved, as a minimum, by a licensed senior operator..." This wording makes it clear that such action must be approved by at least a licensed senior operator acting for the licensee. The regulation focuses on the responsibilities of facility licensees and only peripherally includes licensed senior operators. Under the provision, any licensed senior operator (licensed for the Unit involved) would be sufficient. However, during declared emergencies more senior licensee personnel would eventually become available. The decision to depart from the license would then pass to these more senior personnel already identified in the Emergency Plan.

Ultimate responsibility for the health and safety of the general public and station personnel in an emergency resides in the highest authority in the chain of command. The persons responsible for the health and safety of the general public and station personnel are already identified in the facility license and implementing procedures. These persons include the ADTS and the DSEO following emergency response facility activation. If however, an emergency should occur on a backshift, no licensee representative higher than a licensed senior operator in the chain of command is likely to be available. Therefore, the departure from a license condition or Technical Specification requires the approval of a licensed senior operator as a minimum.

To require any additional approvals or concurrence, such as from senior licensee representatives or the NRC, would defeat the purpose of §50.54(x). Concurrence or approval from the NRC is also not necessary, as this action would amount to a license amendment using procedures contrary to those existing for amendments. NRC concurrence would additionally shift the burden of responsibility for station safety from the licensee to the NRC.

f. Reportability

Deviations authorized pursuant to 10 CFR 50.54(x) are reportable as soon as practical and in all cases within one hour under 10 CFR 50.72(b)(1), or 10 CFR 50.73(a)(2)(i)(C), if not reported simultaneously with emergency notification under 10 CFR 50.72(a). When time permits, the notification is made before the protective action is taken; otherwise, it is made as soon as possible thereafter. Additionally, a Licensee Event Report will be generated and submitted to the NRC within 30 days.

g. Subsequent Actions

Following invocation of 50.54(x) and notification of the NRC, actions are taken as soon as practical to restore the plant to full compliance with Technical Specifications and all conditions of license.

1.4.4 Off-Site Radiological Communications

The radio control console located in the Radiological Dose Assessment Area will be used to support MRDA activities. The FTDC and the off-site RMTs will use this radio net to communicate radiation findings. The RMT vehicles maintained at the EOF are equipped with permanently mounted radios. The radio console at the EOF is monitored by the FTDC. Spare portable radios are stored at the EOF to issue to additional field teams or replace vehicle radios that malfunction.

Off-site teams may be assigned to monitor and report dose assessment findings which occur over water (Long Island Sound). RMT radios which operate on the off-site radiological communications frequency are installed in the Millstone Environmental boat.

1.4.5 Off-Site Radiological Monitoring

Off-site RMTs obtain samples for airborne radioactive contaminants and radiation dose rates for specific points and areas outside the Millstone Station protected area. Off-site RMTs are controlled by the MRDA, who transfers all or portions of this responsibility to the AMRDA or FTDC upon their arrival in the EOF. The goal of the FTDC or designee is to ensure the RMTs are deployed within 60 minutes of event notification.

The RMTs provide the off-site survey information necessary for the plume phase and for environmental sampling during the intermediate and relocation/ingestion pathway phases. The thermoluminescent dosimeters (TLD) and air filters can also provide information to help determine the past integrated dose.

1.4.6 Protective Actions for Offsite Emergency Responders Located at the Station

State/local authorities may deploy offsite responders such as the National Guard or State/local police to the Millstone Station in response to a security-related threat. The State of CT and Waterford Police will be responsible for protective measures for these forces, as necessary (i.e., providing and issuing potassium iodide (KI) in a timely manner, maintaining doses ALARA, and upgrading exposures, issuing and tracking dosimetry). The Manager of Security (MOS) will notify the ADTS of any protective actions put in place.

For an emergency event, radiological or non-radiological, that does *not* involve a security threat, the station would consider these offsite responders as "non-essential" to the event and recommend they evacuate the site. However, they are still under the State's authority and the State may require they stay on site. This decision will be conveyed to the SSS/MOS.

1.4.7 Definitions and abbreviation are contained in Attachment 1. Responsibilities are contained in Attachment 2.

2. **INSTRUCTIONS**

2.1 Refer To and complete the following, as applicable:

NOTE

The steps in the checklists may be performed in any order, or more than once, as necessary.

- EPI-FAP04-001, "Director of Station Emergency Operations (DSEO)"
- EPI-FAP04-002, "Assistant Director Emergency Operations Facility (ADEOF)"
- EPI-FAP04-003, "Manager Radiological Dose Assessment (MRDA)"
- EPI-FAP04-004, "Assistant Manager Radiological Dose Assessment (AMRDA)"
- EPI-FAP04-005, "Radiological Assessment Engineer (RAE)"
- EPI-FAP04-006, "Field Team Data Coordinator (FTDC)"
- EPI-FAP04-007, "Radiation Monitoring Team #3, #4, #5"
- EPI-FAP04-008, "Radiological Communicator - EOF"
- EPI-FAP04-009, "EOF HP Technician"
- EPI-FAP04-010, "Meteorological Assistant"
- EPI-FAP04-011, "Manager of Resources (MOR)"
- EPI-FAP04-012, "Public Information Technical Advisor (PITA) "
- EPI-FAP04-013, "Manager of Communications (MOC)"
- EPI-FAP04-014, "Technical Information Communicator (TIC)"
- EPI-FAP04-015, "EOF Emergency Communicator"
- EPI-FAP04-016, "Station Emergency Preparedness Representative (SEPR)"
- EPI-FAP04-017, "Regulatory Liaison"

2.2 **IF** an action is not appropriate under existing conditions or was not necessary for the event, enter N/A when completing documentation for submittal.

3. SUMMARY OF CHANGES

3.1 Revision 002

3.1.1 CR CR-04-00790/AR 04000550

- Clarified EOF DSEO can relieve the CR DSEO with less than minimum staffing in step 1.4.1 only after attempting to fill any open positions with qualified responders.
- Clarified that the National Guard will notify the SSS/MOS if they are to remain onsite or leave for a precautionary dismissal or evaluation in step 1.4.6.
- Modified the list of individuals who are on the Ops Net in Attachment 1.
- Clarified emergency exposure extension authorization in Attachment 2 for the DSEO and ADEOF.
- Deleted MRDA activity for communicating with the State dose assessment staff and added to RAE. Deleted communicating with the NRC via the HPN (which is done by AMRDA) in Attachment 2.
- Various grammatical changes.

Attachment 1

Definitions and Abbreviations

(Sheet 1 of 3)

Definitions

Alpha or Bravo Posture Code - A State response code that has expected or existing plant conditions relative to a radiological release as its basis. A technical basis for developing a PAR as a result of an EAL classification for all events short of the loss of all three fission product barriers, or high containment radiation.

Calculated Dose Rate (units of mRem/hr or Rem/hr) - A dose rate calculated for actual releases based on measured exposure rates from effluent monitor or survey readings (units of mR/hr or R/hr).

CDE - Committed Dose Equivalent for the thyroid (usually in units of Rem).

Measured Exposure Rate - Exposure rate based on field survey results (units of mR/hr or R/hr).

Operations Net - A communications network established for the CRDC, TA, MOC, and TIC to apprise Emergency Response Facilities of plant status and fast-breaking events, provide operational and technical input, and assist with classification.

Plant Conditions - A technical basis for developing a PAR as a result of actual or imminent loss of all three fission product barriers, or based on high containment radiation levels.

Precautionary Dismissal - A precautionary release of non-essential individuals from the site conducted at the ALERT classification.

Protective Action Recommendation (PAR) - A recommended course of action to take that affects the general population. Issued to state and local decision makers for their consideration in making a protective action decision.

Projected Dose - A calculated exposure received over the duration of the accident. A technical basis for developing a PAR as a result of an ongoing radiological release that is projected on either a measured exposure rate, or a calculated exposure rate for an expected release (units of Rem).

TEDE - Total Effective Dose Equivalent (usually in units of Rem).

"What If" Dose - A theoretical dose projection based on the premise that the accident sequence in progress will result in the partial or total release of an assumed quantity of core inventory (usually in units of Rem).

Wind Direction - The three digit number indicating the degree bearing (000 and 360 being north, 180 being south) from which the wind is coming at the release elevation. Changes in wind direction may constitute the technical basis for updating a PAR.

Attachment 1

Definitions and Abbreviations

(Sheet 2 of 3)

Abbreviations

ADEOF - Assistant Director Emergency Operations Facility

ADTS - Assistant Director Technical Support

AMRDA - Assistant Manager Radiological Dose Assessment

AMT - Accident Management Team

AMTL - Accident Management Team Leader

CAS - Central Alarm Station

CBETS - Computer Based Exposure Tracking System

CTMT - Containment

DEP - Department of Environmental Protection

DSEO - Director of Station Emergency Operations

EAL - Emergency Action Level

EAS - Emergency Alerting System

EDAN - Environmental Data Acquisition Network

EPZ - Emergency Planning Zone

ERDS - Emergency Response Data System

FTDC - Field Team Data Coordinator

JMC - Joint Media Center

KI - Potassium Iodide

MCRO - Manager of Control Room Operations

MOC - Manager of Communications

MOR - Manager of Resources

Attachment 1

Definitions and Abbreviations

(Sheet 3 of 3)

MRDA - Manager of Radiological Dose Assessment

MTSC - Manager of Technical Support Center

NNM - Nuclear News Manager

OFIS - Off-Site Facility Information System

PAG - Protective Action Guideline

PAR - Protective Action Recommendation

PITA - Public Information Technical Advisor (PITA)

RAE - Radiological Assessment Engineer

RCS - Reactor Coolant System

RICC - Rumor and Inquiry Control Center

RMT - Radiological Monitoring Team

RDAT - Radiological Dose Assessment Team

SDO - Station Duty Officer

TEDE - Total Effective Dose Equivalent

TIC - Technical Information Coordinator

Attachment 2 Responsibilities

(Sheet 1 of 4)

1. Director of Station Emergency Operations (DSEO)

After formally relieving the CR DSEO, the EOF DSEO is responsible for the following non-delegable emergency response functions:

- Overall command and control of the station's emergency response
- Event classification
- General public Protective Action Recommendations to offsite officials
- Formal off-site notification approval
- Emergency exposure extension authorization over 25 Rem
- Federal assistance to support station response

2. Assistant Director Emergency Operations Facility (ADEOF)

The ADEOF reports to the DSEO. The ADEOF is responsible for the following:

- Providing input for classification changes based on radiological conditions
- Developing, recommending, and updating off-site PARs to the DSEO
- Providing input for notification upgrades, updates, and termination, as necessary
- Approving emergency exposure upgrades in excess of 10 CFR 20 limits (up to 25 Rem)
- Authorizing potassium iodide (KI) for off-site SERO personnel (e.g., Radiation Monitoring Teams)
- Overseeing off-site radiological assessment of the event
- Coordinating communications of plant status to the NRC, State, and public
- Authorizing contaminated personnel to leave the station
- Reviewing news releases
- Assuming DSEO responsibilities if DSEO becomes incapacitated

Attachment 2 Responsibilities

(Sheet 2 of 4)

3. Manager of Radiological Dose Assessment (MRDA)

The MRDA reports to the ADEOF. The MRDA is responsible for the off-site dose assessment activities. This includes the following activities:

- Monitoring radiological conditions beyond the protected area and ensuring recommended protective actions provided to State officials are adequate to protect the public's health and safety in accordance with US EPA guidance.
- Providing key information to the ADEOF and DSEO that may influence classification as well as protective action decision making.
- Assessing radiological plant conditions and alerting the ADEOF and DSEO when information indicates there has been a significant change.
- Assessing the source term, determining the radiological release pathway, and obtaining meteorological data applicable to an actual or potential radiological release.
- Directing radiological and environmental field measurements be obtained.
- Directing dose assessment be performed.
- Directing core damage estimates be performed.
- Coordinating field team activities with the State DEP.

4. Assistant Manager, Radiological Dose Assessment (AMRDA)

Two AMRDAs report to the MRDA. They assist the MRDA as directed with dose assessment, RDAT strategies, HPN communications, etc.

5. Radiological Assessment Engineer (RAE)

The RAE reports to the MRDA in the EOF. Duties include evaluating actual and potential releases of radioactive material, performing dose assessment calculations, and communicating with State dose assessment staff.

6. Field Team Data Coordinator (FTDC)

The FTDC reports to the MRDA in the EOF. Duties include coordinating the activities of the off-site RMTs, and distributing off-site RMT data.

7. Radiological Monitoring Teams #3, #4, #5 (RMT)

The RMTs report to the FTDC in the EOF. Duties include performing surveys and sampling.

Attachment 2 Responsibilities

(Sheet 3 of 4)

8. Radiological Communicator

The Radiological Communicator reports to the MRDA. Duties include obtaining information on radiological conditions inside the protected area which may impact offsite monitoring and tracking activities.

9. Meteorological Assistant

The Meteorological Assistant reports to the MRDA. Duties include obtaining and preparing current meteorological data and providing forecast information and technical input in matters involving meteorology.

10. Manager of Resources (MOR)

The MOR reports to the ADEOF. The MOR is responsible for the following:

- Providing station personnel, equipment, or supplies requested by SERO managers
- Acquiring corporate and off-site resources
- Coordinating support requests from federal regulatory agencies that have responded to Millstone Station

11. Public Information Technical Advisor (PITA)

The PITA reports to the ADEOF in the EOF. The PITA is responsible for the following:

- Collecting information regarding the event
- Providing input for news releases
- Monitoring media activities
- Supporting the Nuclear News Manager, located at the Hartford Armory

12. Manager of Communications (MOC)

The MOC reports to the ADEOF in the EOF. The MOC is responsible for coordinating all EOF communications which includes Emergency Notification System (ENS) communications between the station and the NRC.

Attachment 2 Responsibilities

(Sheet 4 of 4)

13. Technical Information Communicator (TIC)

The TIC reports to the DSEO. Duties include the following:

- Operating OFIS
- Providing requested plant parameter data
- Informing DSEO/ADEOF of critical parameters impacting classification and PARs
- Maintaining Chronology of Key Events status board
- Obtaining data from the CRDC, as necessary
- Providing information to the State EOC Technical Assistant as requested.

14. EOF Health Physics (HP) Technician

The EOF HP Technician reports to the MRDA. The EOF HP Technician is responsible for providing HP support to the EOF.

15. EOF Emergency Communicator (EC)

The EOF Emergency Communicator reports to the ADEOF in the EOF. The EOF Emergency Communicator is responsible for notifying state and local officials and SERO, as directed.

16. Regulatory Liaison

The Regulatory Liaison reports to the ADEOF. The Regulatory Liaison is responsible for accommodating the NRC Site Response Team dispatched to the station, arranging site access for the NRC Team, providing adequate dosimetry, and responding to questions and comments.

Attachment 2

**Emergency Procedures Implementing (EPI)
Functional Administrative Procedure (FAP)
MP-26-EPI-FAP04-001, "Director of Station Emergency Operations (DSEO)"**

**Millstone Power Station Units 1, 2 and 3
Dominion Nuclear Connecticut, Inc. (DNC)**

3/4/04

Approval Date

~~3/14/04~~⁰⁵

3/12/04

Effective Date

Director of Station Emergency Operations (DSEO)

Section A: EOF Activation/Transfer of Command and Control

- 1. Sign in on the EOF Staffing Board and log date and arrival time on the SERO Log Sheet.
- 2. Obtain a copy of the Incident Report Form (IRF) from the fax machine or call Control Room for IRF information.
- 3. Obtain additional information from the following, as necessary:
 - Voice recording of briefing sheet
 - Additional faxes

NOTE

For a Unit 1 event, the Unit 2 SM is the CR-DSEO. The control room may transfer certain response functions to the EOF before the EOF is declared active. These functions cannot be the non-delegable ones unless the EOF DSEO has assumed command and control.

- 4. Contact CR-DSEO and discuss the following:
 - Any significant changes since event declaration
 - Current status on classification, notification, and PARs.

NOTE

EOF activation should occur within 60 minutes of SERO notification. The EOF can be activated with less than minimum staffing if functional areas are filled. This option should only be used after attempting to fill open positions with qualified responders.

- 5. Check EOF SERO response status as follows:
 - Verify minimum facility staff is present.
 - IF minimum staffing is not present, determine the ability of the SERO to activate as is and proceed as appropriate (i.e., all functional areas staffed).
- 6. Contact the CR-DSEO and formally relieve him of Command and Control, classification, notification, and PAR responsibilities, and log the date and time of relief.
- 7. Declare the EOF activated and record EOF activation time on the SERO Log Sheet.

Section A: EOF Activation/Transfer of Command and Control

8. Announce the following message using the station paging system (repeat once):
- Call Control Room and ensure outside speakers are activated.
 - Announce the following:

Attention all station personnel. This is (name), the DSEO. I am assuming command and control of the Station Emergency Response Organization. The EOF is declared activated at this time. Currently, Millstone Station is in (classification level: _____) for (Unit # _____) due to (brief description of event: _____).

NOTE

1. State/local authorities may deploy offsite responders such as the National Guard or State/local police to the Millstone Station in response to a security-related threat. The State of CT and Waterford Police will be responsible for protective measures for these forces, as necessary (i.e., providing and issuing potassium iodide (KI) in a timely manner, maintaining doses ALARA, and upgrading exposures, issuing and tracking dosimetry). The Manager of Security (MOS) will notify the ADTS of any protective actions put in place.
2. For an emergency event, radiological or non-radiological, that does *not* involve a security threat, the station would consider these offsite responders as “non-essential” to the event and evacuate them from the site. However, they are still under the State’s authority and the State may require they stay on site. This decision will be conveyed to the SSS/MOS via the National Guard.

9. Perform an update briefing with the CR-DSEO and the ADTS using EPI-FAP15-001, “DSEO/ADTS Briefing Sheet,” as a guide.
- Obtain information on offsite responders (i.e., National Guard) onsite or responding to the site from the ADTS and any protective actions in place.
10. Brief the EOF Managers on the event.
11. Establish contact with the Richmond Corporate Executive and provide input on the event.
12. Establish frequent communications with the ADTS and the Chief Technical Spokesperson (CTS).

Section B: Classification Upgrade Immediate Actions

1. Evaluate the conditions using EPI-FAP06, "Classification and PARs."
 - Review the initiating condition with the TIC and the ADTS for recommendations on plant-related EALs.
 - Consult with the MRDA for recommendations on radiological-related EALs.
 - Consult with the MOS for recommendations on security-related EALs.
2. Perform Station Notifications as follows:
 - Notify the ADTS of the classification upgrade.
 - Direct the Emergency Communicator to initiate offsite notifications.
 - IF a General Emergency has been declared, direct the ADEOF to develop PARs.
 - Announce the emergency declaration level and time to the station staff via plant page announcement as follows:

NOTE

During a security event, it may *not* be advisable to sound an alarm or make a PA announcement.

- Call Control Room and ensure outside speakers are activated.
 - Announce the following over the station PA system:
Attention all personnel; attention all personnel. A (classification level _____) has been declared at (Unit # _____) due to (brief description of event _____)
 - Repeat the PA message.
 - Log the time of announcement.
- Announce that there will be no eating or drinking until further habitability is verified.
 - Log time of completion.

Section B: Classification Upgrade Immediate Actions

3. Perform state notification as follows:

- Direct the ADEOF to assist in completing the IRF (e.g., obtain meteorological data).
 - IF an offsite State of Emergency does not exist, approve the IRF for transmittal.
 - IF an offsite State of Emergency does exist and the Governor has directed all future notifications be processed through the State EOC, approve the IRF and provide it only to the Chief Technical Spokesperson (CTS).
- IF a General Emergency has been declared, review and approve PARs and directly notify the DEP.

4. Perform NRC notifications as follows:

- Verify the MOC notifies the NRC via the ENS.
- Direct the ADEOF to contact the resident inspector if he/she is not on site.

5. Perform additional notifications as follows:

- Inform the CTS of the event.
- IF NRC Site Team DSO is present, discuss the classification with him/her.
- Inform the Richmond Corporate Executive of the event.

Section C: Routine Activities

- 1. Track the response of additional minimum staffing and full staffing positions and direct the MOR to contact personnel for unfilled positions.
- 2. Direct the TIC to continuously man the Operations Net and review the EAL tables and fission product barriers for changes in event status.
- 3. Obtain periodic input from the ADTS on the following:
 - Plant status and mission priorities.
 - Fast-breaking events.
 - Impact on EALs.
- 4. Ensure updates of the event are routinely provided to the State and local agencies.

NOTE

DSEO pre-approved news release templates may be used by the PITA/NNM to issue news releases during fast changing emergency event classifications until additional information is available. Follow-up news releases shall be reviewed and approved by the DSEO/CTS.

- 5. Approve all news releases forwarded from the ADEOF before issuing from the EOF.
- 6. WHEN the State EOC is staffed and news releases are issued through the JMC, authorize the CTS to approve news releases
- 7. IF the fission product barrier status, offsite radiological conditions, or meteorological conditions change, perform the following:
 - Refer to Section B and evaluate the conditions.
 - Direct the ADEOF to evaluate the impact on PARs.
 - Provide changes to PARs to the State, as appropriate.
- 8. Obtain the status on any precautionary dismissal, evacuation, and accountability activities in progress from the MOS.
 - IF offsite resources are onsite, obtain status on activities and protective actions in place from the ADTS.

NOTE

The State of CT and Waterford Police are responsible for emergency exposure upgrades for offsite responders onsite.

- 9. Authorize extended emergency exposure limits for lifesaving actions (dose > 25 Rem is expected) as appropriate when recommended by the ADTS for onsite personnel and the ADEOF for offsite personnel.

Attachment 3

**Emergency Procedures Implementing (EPI)
Functional Administrative Procedure (FAP)**

MP-26-EPI-FAP04-002, "Assistant Director Emergency Operations Facility (AEOF)"

**Millstone Power Station Units 1, 2 and 3
Dominion Nuclear Connecticut, Inc. (DNC)**

3-4-04

Approval Date

~~3/14/04~~⁰⁵ 3/12/04
Effective Date

Assistant Director Emergency Operations Facility (ADEOF)

This form provides guidance to the ADEOF for emergency response actions during an event which activates the SERO.

Section A: EOF Activation/Initial Actions

- 1. Sign in on the EOF Staffing Board and log date and arrival time on the SERO Log Sheet.
- 2. Obtain a briefing from the DSEO.
- 3. IF the DSEO has not yet responded to the facility, perform the following:
 - Direct the MOR to immediately contact a qualified DSEO.
 - Assign an individual to the ADEOF position.
 - Assume the responsibilities assigned to the DSEO position and Go To EPI-FAP04-001.
- 4. IF a General Emergency was declared before EOF activation, determine the PAR issued by the CR-DSEO.
- 5. Conduct an initial briefing with the MRDA and AMRDAs concerning the following:
 - Initial dose assessment results
 - On-site and off-site radiological conditions
 - EOF High Radiation Ventilation Filtration System activation
 - Off-site protective actions
 - HPN data passed to NRC
- 6. Conduct an initial briefing with the Public Information Technical Advisor (PITA) concerning the following:
 - Press releases
 - Rumors to date
- 7. Conduct an initial briefing with the MOC concerning the following:
 - ERDS
 - ENS
- 8. Contact the MRCA and obtain information on on-site protective actions if taken.

Section A: EOF Activation/Initial Actions

- 9. WHEN EOF is activated and the Emergency Communicator arrives, direct the Emergency Communicator to relieve the control room of future ENRS notification responsibilities.

Section B: Classification/Termination

- 1. Refer To EPI-FAP06, "Classification and PARs," as applicable, to determine if any initiating conditions have been met.
 - IF plant conditions change, specifically the status of the fission product barriers, discuss the conditions with the TIC.
 - IF radiological or meteorological conditions change, discuss the conditions with the MRDA.
 - Discuss EAL classification input with the DSEO.
- 2. Assist the DSEO with event termination and transition to Recovery.

Section C: Notifications

NOTE

IF the Governor declares a State of Emergency and directs all future classification changes and updates be processed through the State EOC, Incident Report Forms shall *not* be transmitted to the offsite agencies using the ENRS.

- 1. IF a change in classification level occurs or an update is warranted, perform the following:
 - a. Ensure the Emergency Communicator completes an IRF for the new classification level or update message.
 - b. IF a State of Emergency **HAS NOT** been declared by the Governor, ensure the IRF is transmitted after the DSEO approves it.
 - c. IF a State of Emergency **HAS** been declared by the Governor and all future notifications are to be processed through the State EOC, ensure the following:
 - The IRF is **NOT** transmitted to the offsite agencies.
 - The DSEO reads the IRF to the Chief Technical Spokesperson (CTS).
 - The IRF is faxed to the CTS or NNM.
 - The CTS notifies OEM and DEP of the message.

Section D: Protective Action Recommendations



The State must be notified within 15 minutes of the decision to issue or update PARs. PARs are *not* to be based on "What If" dose projections unless the basis of the "What If" projection is expected to occur shortly, is well understood, and has been validated by the DSEO and ADTS.

- 1. IF a GENERAL EMERGENCY is declared or conditions change while in a GENERAL EMERGENCY, develop PARs as follows:
 - a) Obtain wind direction from the MRDA.
 - b) Refer To and complete EPI-FAP06-006, "EOF PARs."
 - c) IF necessary, Refer To and review EPI-FAP06 Attachment 4, "PAR Zone Descriptions."
 - d) Ensure the DSEO verbally transmits the PAR to the DEP within 15 minutes, and then to the CTS.
- 2. Ensure the PAR form is faxed to the State EOC.
- 3. Update the Chronology of Events status board with current PAR information.
- 4. Determine the Protective Actions implemented by the State and notify NRC via the MOC.
- 5. Continuously evaluate the need for a PAR update, based on the following:
 - Change in fission product barrier status
 - Change in containment radiation levels
 - Change in radiological dose assessment
 - Change in wind direction
- 6. IF EPA PAGs (≥ 1 Rem TEDE or ≥ 5 Rem CDE thyroid) are or are suspected to be exceeded beyond 10 miles, perform the following:
 - Ensure that the DSEO has informed the DEP of the situation.
 - Develop PARs for areas beyond the EPZ that are affected.

Section E: Radiological Controls

NOTE

State/local authorities may deploy offsite responders such as the National Guard or State/local police to the Millstone Station in response to a security-related threat. The State of CT and Waterford Police will be responsible for protective measures for these forces, as necessary (i.e., providing and issuing potassium iodide (KI) in a timely manner, maintaining doses ALARA, and upgrading exposures, issuing and tracking dosimetry). The Manager of Security (MOS) will notify the ADTS of any protective actions put in place.

- 1. IF notified by the MRDA that implementation of EPI-FAP09, "Radiation Exposure Controls," is needed for emergency exposure increases or issuing KI to off-site SERO emergency workers, perform the following:
 - Evaluate the emergency condition.
 - IF KI is warranted, inform the DSEO that KI will be issued to off-site SERO emergency workers.
 - IF exposure upgrades up to 25 Rem are required, inform DSEO of increase.
 - IF exposure upgrades greater than 25 Rem are required, obtain DSEO approval.
 - Refer To EPI-FAP09-003 and sign and date appropriate form, indicating approval.
 - Direct the MRDA to implement emergency control.
- 2. Coordinate the release of contaminated individual(s) from site to a designated decontamination location.
- 3. IF decontamination capabilities are needed for emergency response individuals and/or station personnel and on-site areas (EOF, Unit 2, Unit 3) are not usable, perform the following:
 - Notify offsite location of the need to use these facilities (via MOR).
 - IF necessary, notify bus company to provide transportation (via MOR).
 - Inform MRDA to provide HP support to this location (via RadCom to MRCA).
 - Inform contaminated individuals to proceed to the offsite location.

Section F: Routine Activities

- 1. IF a release is imminent or in progress, ensure the EOF high radiation ventilation filtration system is activated.
- 2. Conduct periodic briefings with the MRDA, PITA, and MOC, as applicable.
- 3. Verify all press release information and obtain DSEO approval to release.
- 4. Authorize release of Nuclear Network messages from the PITA.
- 5. Direct the Regulatory Liaison to prepare for NRC Site Team arrival.
- 6. Prepare and conduct briefings of event conditions with the NRC Site Team.
- 7. Provide the NRC Site Team with familiarization of the following lead functional areas:
 - Overall command and control (DSEO)
 - Radiological activities onsite/offsite (MRDA)
 - Plant technical response (ADTS, AMTL)
 - Resource Management (MOR)
 - Communications (MOC)

Prepared by: _____

Signature

Print

Date

Attachment 4

**Emergency Procedures Implementing (EPI)
Functional Administrative Procedure (FAP)
MP-26-EPI-FAP04-011, "Manager of Resources (MOR)"**

**Millstone Power Station Units 1, 2 and 3
Dominion Nuclear Connecticut, Inc. (DNC)**

3/4/04

Approval Date

3/14/04⁰⁵ 3/12/04
Effective Date

Manager of Resources (MOR)

This form provides guidance to the MOR for emergency response actions during events that activate the SERO.

Section A: Initial Actions

NOTE

MP-26-EPA-REF08B, "Millstone Emergency Plan Resource Book," contains the phone numbers for SERO personnel, Offsite governmental officials and emergency responders, and support resources points of contact.

- 1. Sign in on the EOF Staffing Board and log date and arrival time on the SERO Log Sheet.
- 2. Notify the ADEOF of arrival and obtain a status briefing.
- 3. Maintain a log of significant events and communications on the SERO Log Sheet.
- 4. Obtain the SERO call-back verification report from the fax in the MOC's office.
- 5. IF the Community Alert Network (CAN) printout is available, obtain it from the EOF fax and compare it with the SERO call-back verification report results.
- 6. Perform Assembly Area activities in accordance with EPI-FAP08, "Evacuation and Assembly."
- 7. When all of the facilities are activated and fully staffed, Refer To Section B.3 and complete a SERO Facility Shift Staffing roster for on-shift and first relief shift personnel.
- 8. Determine need for essential resources.
- 9. Notify INPO that the SERO has been activated.

Section B: Recurring Actions

- 1. Coordinate obtaining extra personnel for any emergency facility that requires additional assistance as follows:
 - Contact the necessary individuals.
 - Refer To EPI-FAP15-011, "Fitness for Duty Questionnaire," and determine if notified personnel are fit for duty.
 - IF notified personnel are determined fit for duty, request personnel to report to the EOF.
 - WHEN personnel arrive, coordinate access for the responders into the Protected Area with Security as necessary.

- 2. Transfer additional support personnel to respective ERFs as follows:
 - Consult the MRDA to determine safe access routes for transporting personnel to the station.
 - Issue an Emergency Vehicle Pass to each vehicle transporting personnel from the EOF to the station.

- 3. Prepare shift relief schedules and rosters as follows:
 - a. Consult with the DSEO and SERO managers to determine shift personnel requirements.
 - b. Notify personnel of the following:
 - Shift assignment
 - Shift duration
 - Reporting time
 - Reporting location
 - c. Record shift assignments next to the SERO position on Section D and designate as shift 1, 2, or 3.

- 4. Notify the following of the emergency:
 - Purchasing Department
 - Nuclear Maintenance Department
 - Nuclear Site Services Department
 - Nuclear Procedures and Document Administration
 - Transportation Department
 - Richmond Corporate Operations Center

Section B: Recurring Actions

- 5. Request Information Technology provide support personnel to the EOF, as necessary.
- 6. Request photocopier services provide support personnel to the EOF, as necessary.
- 7. Contact the Nuclear Maintenance Department for the following resources:
 - Craft Labor
 - Tools
 - Equipment
- 8. Contact the Purchasing Department for the following resources:
 - Consulting Services
 - Expense Account Services
 - Temporary Housing
 - Food
- 9. Contact the Nuclear Site Services Department for the following resources:
 - Supplies
 - Vehicles
 - Heavy Machinery
- 10. Contact the Transportation Department for the following resources:
 - Vehicles
 - Equipment
 - Supplies
 - Personnel
- 11. Consult the DSEO to determine the need for outside agency assistance.
- 12. Obtain DSEO approval before requesting equipment or services over \$100,000.
- 13. Contact the Richmond Corporate Operations Support for the following additional resources:
 - Additional transportation needs
 - Petty cash
 - Legal, insurance, and treasury services
 - Any other corporate resources, as necessary

Section B: Recurring Actions

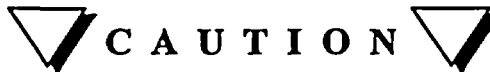
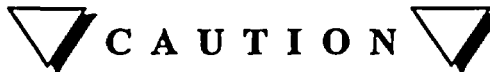
- 14. Obtain additional support for services from INPO, as necessary.
- 15. Coordinate with the Regulatory Liaison to support the following, as necessary:
 - NRC site team
 - Supporting organizations

NOTE

The following events may require large amounts of bottled breathing air:

- Environmental or radiological release that threatens control room habitability
- Fire or chemical release
- Conditions projected to exhaust or restrict access to SCBA deployment on-site

- 16. IF event requires large amounts of bottled breathing air, perform the following:
 - a. Request Emergency Equipment and Services Personnel provide the following:
 - Additional bottles
 - Refills
 - Additional SCBAs for relief teams.

 **CAUTION** 

Refills are usually provided from a cascade system of storage tanks replenished by a compressor. Running the compressor at a facility on or near the site during a radiological release may contaminate the air in the cascade system.

- b. IF radiological event is in progress and the Fire Training cascade system requires filling by compressor, request off-site organizations refill bottles.
- c. Coordinate bottle transport between points of use and refill facilities.

Section C: Termination

1. IF directed by the DSEO to terminate the SERO, perform the following:
- Notify departments, corporate, and agencies supporting the site with resources that the event has been terminated.
 - Cancel any orders for resources no longer needed as a result of the termination.

Prepared by:

Signature

Print

Date

Section D: SERO Facility Shift Staffing

TSC/OSC Combined Facility

Shift 1 Shift 2 Shift 3

Shift From: _____ (hrs) To: _____ (hrs)

POSITION	NAME	PHONE	PAGER
<i>Minimum Staffing - 60 Minute Response</i>			
MRCA			
TSCRE			
UADTS			
UMOSC			
UMTSC			
UTSCEE			
UTSCME			
<i>Full Staffing</i>			
AMTL			
AMT TH			
MOS			
RAD COM			
UADTS			
UMTSC			
UOSCMA			
UTSC SM			
UTSCEE			
UTSCME			

Any route restrictions: No Yes

Section D: SERO Facility Shift Staffing

OSC Assembly Area

Shift 1 Shift 2 Shift 3

Shift From: _____ (hrs) To: _____ (hrs)

POSITION	NAME	PHONE	PAGER
<i>Minimum Staffing - 60 Minute Response</i>			
ARPS			
GES			
RMT #2A			
RMT #2B			
RMT #2C			
RMT #2D			
UELEC			
UELEC			
UI&C Tech			
UI&C Tech			
UMECH			
UMECH			
<i>Full Staffing</i>			
CBETS Operator			
UI&C OSC			
UI&C OSC			
UMOSC			
UOSCMA			
UTSC SM			

Any route restrictions: No Yes

Section D: SERO Facility Shift Staffing

Unit 1 Event (Unit 2 Control Room)

Shift 1 Shift 2 Shift 3

Shift From: _____ (hrs) To: _____ (hrs)

POSITION	NAME	PHONE	PAGER
SM/Certified Fuel Handler			
PEO (Unit 2 PEO/RO/SRO)			

Unit 2 or Unit 3 Control Room (Circle One)

Shift 1 Shift 2 Shift 3

Shift From: _____ (hrs) To: _____ (hrs)

POSITION	NAME	PHONE	PAGER
SM/MCRO			
US			
STA			
CO			
CO			
PEO			
PEO			

Station Shift Support

Shift 1 Shift 2 Shift 3

POSITION	NAME	NUMBER	PAGER
SDO			
Emergency Communicator			
RMT #1			
RMT #1			
RMT #1 (30-60 minute response)			
Chem Technician			
Chem Technician			
UCRDC			
UCRDC			

Any route restrictions: No Yes

Section D: SERO Facility Shift Staffing

EOF

Shift 1 Shift 2 Shift 3

Shift From: _____ (hrs) To: _____ (hrs)

POSITION	NAME	PHONE	PAGER
<i>Minimum Staffing - 60 Minute Response</i>			
ADEOF			
DSEO			
EOF HP			
EOF Emergency Communicator			
MOR			
PITA			
MRDA			
RMT #3			
RMT Driver			
RMT #4			
RMT Driver			
RMT #5			
RMT Driver			
UMOC			
UTIC			
<i>Full Staffing</i>			
AMRDA			
AMRDA			
FTDC			
MET Assistant			
RAD COMM			
RAE			
Regulatory Liaison			
Station EP Representative			
UMOC			
UTIC			

Any route restrictions: No Yes

Section D: SERO Facility Shift Staffing

State EOC

Shift 1 Shift 2 Shift 3

Shift From: _____ (hrs) To: _____ (hrs)

POSITION	NAME	PHONE	PAGER
<i>Minimum Staffing - 90 Minute Response</i>			
Chief Technical Spokesperson (CTS)			
NNM			
<i>Full Staffing</i>			
Media Liaison			
Rad Briefer			
Rumor and Inquiry Control			
Technical Briefer			
Technical Assistant			
State EP Liaison			

Any route restrictions: No Yes

Attachment 5

**Emergency Procedures Implementing (EPI)
Functional Administrative Procedure (FAP)
MP-26-EPI-FAP05, "State Emergency Operations Center (EOC) Activation and
Operation"**

**Millstone Power Station Units 1, 2 and 3
Dominion Nuclear Connecticut, Inc. (DNC)**

**Functional
Administrative
Procedure**



Millstone Station

**State Emergency Operations Center (EOC) Activation
and Operation**

MP-26-EPI-FAP05

Rev. 002

Approval Date: 3-15-04

Effective Date: 3-19-04



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ATTACHMENTS AND FORMS

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MP-26-EPI-FAP05-001, "Chief Technical Spokesperson (CTS)"
MP-26-EPI-FAP05-002, "Technical Assistant (TA)"
MP-26-EPI-FAP05-003, "Nuclear News Manager (NNM)"
MP-26-EPI-FAP05-004, "Rumor Control Liaison (RCL)"
MP-26-EPI-FAP05-005, "Media Center Liaison (MCL)"
MP-26-EPI-FAP05-006, "Technical Briefer (TB)"
MP-26-EPI-FAP05-007, "Radiological Briefer (RB)"
MP-26-EPI-FAP05-008, "State Emergency Planning Liaison (SEPL)"

1. PURPOSE

1.1 Objective

This procedure provides guidance to Station Emergency Response Organization (SERO) personnel who report to the Connecticut State Emergency Operations Center (SEOC) upon declaration of an ALERT/Posture Code Charlie-One or higher event.

1.2 Applicability

This procedure applies to Millstone personnel responding to the SEOC upon activation of the Millstone SERO.

1.3 Supporting Documents

1.3.1 MP-26-EPI-FAP04, "Emergency Operations Facility Activation and Operations"

1.3.2 MP-26-EPI-FAP13, "Press Releases"

1.3.3 MP-26-EPI-FAP15, "Common Forms"

1.3.4 MP-26-EPA-REF08B, "Millstone Emergency Plan Resource Book"

1.4 Discussion

1.4.1 SEOC and Joint Media Center (JMC) Activation

Activation of the Millstone SERO at the SEOC is initiated upon declaration of an Alert or higher event, however, activation of the state EOC is optional upon declaration of an Alert.

At the ALERT or higher classification level:

- All SEOC SERO positions report to the state Armory in Hartford.
- The Chief Technical Spokesperson (CTS) is the lead Millstone Station SERO member at the SEOC.
- The Nuclear News Manager (NNM) reports to the CTS and directs the overall Millstone public information response. The NNM serves as the official spokesperson until relieved by the CTS.

For Unusual Events, the NNM completes and issues a news release to appropriate news media organizations.

1.4.2 News Conferences

News conferences are the responsibility of the State of Connecticut, and are coordinated through the Office of Emergency Management. They will be attended by the CTS and/or appropriate members of the Millstone SERO as determined by the CTS.

1.4.3 Definitions and abbreviation are contained in Attachment 1.

1.4.4 Responsibilities are contained in Attachment 2.

2. INSTRUCTIONS

2.1 Refer To and complete the following forms, as applicable:

NOTE

The steps in the checklists may be performed in any order, or more than once, as necessary.

- EPI-05-001, "Chief Technical Spokesperson (CTS) "
- EPI-05-002, "Technical Assistant (TA)"
- EPI-05-003, "Nuclear News Manager (NNM)"
- EPI-05-004, "Rumor Control Liaison (RCL)"
- EPI-05-005, "Media Center Liaison (MCL)"
- EPI-05-006, "Technical Briefer (TB)"
- EPI-05-007, "Radiological Briefer (RB)"
- EPI-05-008, "State Emergency Planning Liaison (SEPL)"

2.2 IF an action is not appropriate under existing conditions OR was not necessary for the event, enter "N/A" when completing documentation for submittal.

3. SUMMARY OF CHANGES

3.1 Revision 002

- 3.1.1 Updated definitions in Attachment 1.
- 3.1.2 Modified the individuals who interface with the MCL and RCL in Attachment 2.
- 3.1.3 Changed the name of the reporting location for the TB and RB in Attachment 2.
- 3.1.4 Modified SEPL responsibilities in Attachment 2.
- 3.1.5 Minor writer's guide format changes.

Attachment 1

Definitions and Abbreviations

(Sheet 1 of 1)

Definitions

Regular Intervals - Every 30 minutes

Represent - To act in place of

Abbreviations

ADEOF - Assistant Director Emergency Operations Facility

CDO - Communications Duty Officer

CRDC - Control Room Data Coordinator

CTS - Chief Technical Spokesperson

DEP - Department of Environmental Protection

DSEO - Director of Station Emergency Operations

EAL - Emergency Action Level

EAS - Emergency Alert System

IRF - Incident Report Form

JMC - Joint Media Center

KI - Potassium Iodide

NCS - Nuclear Communication Services

NNM - Nuclear News Manager

OFIS - Off-Site Facilities Information System

PAR - Protective Action Recommendation

PIO - Public Information Officer

TA - Technical Assistant

TIC - Technical Information Coordinator

OEM - Office of Emergency Management

SEOC - State Emergency Operations Center

Attachment 2 Responsibilities

(Sheet 1 of 2)

The following positions make up the public information emergency organization:

1. Chief Technical Spokesperson (CTS)

The Chief Technical Spokesperson reports to the Director of Station Emergency Operations and is responsible for:

- Coordinating Millstone Station staff resources at the State EOC and Joint Media Center.
- Interacting with the State Emergency Response Organization (ERO).
- Representing the station and company at briefings with the Governor or designee.
- Presenting information on plant status at media briefings and news conferences.

2. Nuclear News Manager (NNM)

The Nuclear News Manager reports to the CTS and is responsible for:

- Event notifications.
- Serving as Millstone Station spokesperson, prior to the arrival of the CTS.
- Media response.
- Finalizing and issuing news releases.
- Preparing Millstone Station officials for news conferences.
- Rumor and inquiry control.
- Monitoring media.
- Periodic communications with Corporate Nuclear Public Communications.
- Coordinating public information activities with the Governor's Press Office and State Public Information Officers.
- Serving as Media Center Liaison and Rumor Control Liaison until these positions are staffed.

3. Technical Assistant (TA)

The Technical Assistant reports to the Chief Technical Spokesperson and is responsible for:

- Obtaining technical information from the site
- Operating OFIS in the SEOC
- Interfacing with the State DEP, as necessary
- Serving as backup to the CTS in communications with the DSEO and logkeeping

Attachment 2 Responsibilities

(Sheet 2 of 2)

4. Public Information Technical Advisor (PITA)

The Public Information Technical Advisor reports to the EOF following notification of an Alert or higher classification event and is responsible for developing news releases for DSEO or CTS approval for NNM release to media.

5. Media Center Liaison (MCL)

The Media Center Liaison reports to the NNM at the SEOC and coordinates with the State Media Center Supervisor and is responsible for:

- Assisting with the operation of the Joint Media Center.
- Responding to media inquiries.
- Supervising Millstone Station technical and radiological briefing personnel in the JMC.

6. Rumor Control Liaison (RCL)

The Rumor Control Liaison reports to the NNM at the SEOC and is responsible for coordinating with the State Rumor Control Officer to assist with the operations of the Joint Rumor and Inquiry Control Center.

7. Technical Briefer (TB)

The Technical Briefer reports to the Media Center Liaison at the SEOC and is responsible for providing technical plant-specific information to the media between official news conferences.

8. Radiological Briefer (RB)

The Radiological Briefer reports to the Media Center Liaison at the SEOC and is responsible providing radiological information to the media between official news conferences.

9. State Emergency Planning Liaison (SEPL)

The State EP Liaison is responsible for providing support to the SERO organization at the State Armory as well as to the State Office of Emergency Management (OEM), as requested.

Attachment 6

**Emergency Procedures Implementing (EPI)
Functional Administrative Procedure (FAP)
MP-26-EPI-FAP05-001, "Chief Technical Spokesperson (CTS)"**

**Millstone Power Station Units 1, 2 and 3
Dominion Nuclear Connecticut, Inc. (DNC)**

3-15-04

Approval Date

3-19-04

Effective Date

Chief Technical Spokesperson (CTS)

This form provides guidance to the Chief Technical Spokesperson (CTS) for emergency response actions during an emergency that activates the SERO.

Section A: Initial Actions

- 1. Upon arrival at the SEOC, establish continuous communications with the DSEO and discuss the following information:
 - Official station clock time
 - Status of SEOC activation
 - SERO armory staffing (SERO Staffing Sheet)
 - Joint Media Center (JMC) activation
- 2. Consult with the NNM to confirm JMC activation at SEOC and status of the latest news and public information releases.
- 3. Ensure the TA is present and in communication with the TIC.
- 4. Verify OFIS information is available.

NOTE

The CTS has access to site information from the following sources:

- OFIS (via Technical Assistant)
- TIC (via Technical Assistant)
- NNM
- DSEO via EOF conference calls

- 5. Verify DEP and OEM representatives are aware of all EAL classifications and bases, and major/key status events.
- 6. Obtain information on event and coordinate with the NNM to issue press releases and conduct press briefings.
- 7. Verify both minimum staffing and full staffing are present at the SEOC and report status of each to the DSEO.

Section A: Initial Actions**NOTE**

CTS may use a joint log maintained by the TA if so desired.

- 8. Maintain a log of actions and decisions.
- 9. Conduct an initial briefing with all staff on status and priorities, including station clock time synchronization.

NOTE

DSEO pre-approved news release templates may be used by the PITA/NNM to issue news releases during fast changing emergency event classifications until additional information is available. Follow-up news releases shall be reviewed and approved by the DSEO/CTS.

- 10. When appropriate, contact DSEO and relieve him of the responsibility for approving news releases.
- 11. When you have news release approval authority, inform NNM.

Section B: Recurring Actions

- 1. Verify TA maintains current information on the following:
 - Status reports on the plant and safety systems
 - Event classification basis and projections
 - Actions taken at the site (i.e., evacuation, Potassium Iodide usage, etc.)
 - Radioactive releases, imminent, ongoing, or terminated

NOTE

PARs will be communicated directly from the DSEO to the DEP. A PAR must be issued with a GENERAL EMERGENCY declaration.

- 2. Obtain bases for event classifications and PARs from the DSEO immediately after the PAR has been communicated.
- 3. Notify DSEO of State Protective Action decisions.
- 4. Attend briefings conducted by the Governor and discuss plant status and prognosis.
- 5. Consult NNM on latest news and public information releases.
- 6. Brief staff periodically on status and priorities.
- 7. Assist DEP and OEM in obtaining any other event information.
- 8. IF a joint CTS/TA log is to be used, direct the TA to maintain a joint log.

Prepared by: _____

Signature

Print

Date

Section C: SERO State Armory Staffing

MINIMUM STAFFING POSITIONS:

	1 st Shift	TIME
Chief Technical Spokesperson	_____	_____
Nuclear News Manager	_____	_____

FULL STAFFING POSITIONS:

Technical Advisor	_____	_____
Rumor Control Liaison	_____	_____
Media Center Liaison	_____	_____
Technical Briefer	_____	_____
Radiological Briefer	_____	_____
State EP Liaison	_____	_____

Attachment 7

**Emergency Procedures Implementing (EPI)
Functional Administrative Procedure (FAP)
MP-26-EPI-FAP05-002, "Technical Assistant (TA)"**

**Millstone Power Station Units 1, 2 and 3
Dominion Nuclear Connecticut, Inc. (DNC)**

3-15-04

Approval Date

3-19-04

Effective Date

Technical Assistant (TA)

This form provides guidance to the Technical Assistant (TA) for emergency response actions during an emergency that activates the SERO.

Section A: Initial Actions

- 1. Upon arrival at the SEOC, notify Chief Technical Spokesperson (CTS).
- 2. Verify availability of OFIS and Refer To posted job aid or EPI-FAP15-006, "OFIS Instructions," to log onto OFIS.
- 3. As deemed necessary, access and monitor the OPs Net using the posted job aid instructions.
- 4. Refer to MP-26-EPA-REF08B, "Millstone Emergency Plan Resource Book," as necessary, and obtain additional information by phone from the TIC at the EOF.

Section B: Recurring Actions

- 1. Obtain plant status and parameters from OFIS, the TIC, or CRDC, at regular (30 minute) intervals and provide to the CTS.
- 2. Provide projections of event classifications and basis.
- 3. Provide actions taken at the site, such as Protective Action Decisions (PADs) (i.e., evacuation, KI usage).
- 4. Provide information on radioactive releases imminent, ongoing, or terminated.
- 5. IF plant conditions change, Refer To EPI-FAP15-001, "DSEO/ADTS Briefing Sheet."
- 6. IF major plant conditions change (e.g., emergency classification, radioactive release conditions, etc.), immediately notify CTS.
- 7. Maintain CTS logbook, as directed.
- 8. Monitor OFIS data points, as requested and maintain on Section C, "Specific Parameter Monitoring."

Prepared by: _____

Signature

Print

Date

Section C: Specific Parameter Monitoring

Parameter	OFIS Code	Time	Time	Time	Time	Time	Time

NOTES:

Attachment 8

**Emergency Procedures Implementing (EPI)
Functional Administrative Procedure (FAP)
MP-26-EPI-FAP05-003, "Nuclear News Manager (NNM)"**

**Millstone Power Station Units 1, 2 and 3
Dominion Nuclear Connecticut, Inc. (DNC)**

3-15-04
Approval Date

3-19-04
Effective Date

Nuclear News Manager (NNM)

This form provides guidance to the Nuclear News Manager (NNM) for emergency response actions during an Unusual Event or higher.

Section A: Initial Actions

NOTE

Media notifications for UNUSUAL EVENTS, Delta-One events that occur between the hours of 10:00 p.m. and 7:00 a.m. may be made the following morning. If a news release is being issued off-hours, it may be necessary for the NNM to proceed to the station to fax completed news releases.

1. **IF** there is an UNUSUAL EVENT, perform the following actions:
- Contact the Station Duty Officer in the affected unit Control Room for information.
 - Obtain basic information, including contact names and numbers.
 - Notify the Nuclear Communications Duty Officer of the event.
 - Complete and issue a news release to the following news media via FAX: (Reference MP-26-EPA-REF08B section 3.20 for fax numbers.)
 - New London Day
 - Hartford Courant
 - Norwich Bulletin
 - Associated Press.

NOTE

Before the Chief Technical Spokesperson (CTS) arrives at the SEOC, the NNM represents Millstone during Governor's briefings and news conferences.

2. Upon arrival at the SEOC for events at an ALERT or higher, notify the CTS and State Officials of NNM presence in State EOC.
3. Verify dedicated phone lines to the EOF Public Information Technical Advisor (PITA) are operational.
4. Coordinate activation of the Joint Media Center and Rumor and Inquiry Control Center through the Governor's Press Secretary, or designee.

Section A: Initial Actions

- 5. Refer To the posted job aid and establish electronic mail (e-mail) contact with PITA (DNCMPI@dom.com) at the EOF.
 - Remove old (electronic) news releases from past events/drills.

- 6. Refer To pre-programmed speed dials, posted job aids, or MP-26-EPA-REF08B, "Millstone Emergency Plan Resource Book," (6.3 Dominion Corporate Response Organization) and perform the following:
 - Contact the Corporate Dominion Nuclear Public Information
 - Establish connection with Corporate Dominion electronic mail via Public Affairs Website.

- 7. Maintain a log of significant events and communications.

- 8. Perform role of Media Center Liaison and/or Rumor Control Liaison until these positions are filled.

- 9. Inform the PITA when news release approval authority has been transferred to the CTS.

Section B: Recurring Actions

- 1. Coordinate the following with the PITA.
 - Final news releases using EPI-FAP13, "News Releases," based on information received from the PITA, and CTS briefings.

NOTE

DSEO pre-approved news release templates may be used by the PITA/NNM to issue news releases during fast changing emergency event classifications until additional information is available. Follow-up news releases shall be reviewed and approved by the DSEO/CTS.

- 2. Review DSEO approved news release with the CTS.
- 3. Coordinate the issuance of news releases with both the CTS and the Governor's public information staff.
- 4. Distribute news release using the preprogrammed fax machine as follows:
 - ⇒ Dominion Public Affairs
 - ⇒ Local Media
 - ⇒ CT State Media
 - ⇒ Government
 - ⇒ Local & Government
 - ⇒ All Lists
- 5. Refer To EPI-FAP13, "News Releases," to address rumors received at the Joint Rumor and Inquiry Control Center.
- 6. Provide rumor trend information to public via news releases, as appropriate.
- 7. If the Joint Media Center has not been activated, Refer To MP-26-EPA-REF08B (section 4.9.3) and provide the Associated Press (AP) with a phone number to assist the news media in contacting the NNM for verification of current information.
- 8. Supervise Millstone operations at the JMC and Rumor and Inquiry Control Area, as necessary.
- 9. As soon as practical, coordinate with the State Media Center Supervisor to obtain media (radio and TV) reports and immediately correct misinformation.
- 10. Fax approved/distributed State news release and EAS messages to the PITA at the EOF and to corporate Nuclear Public Communications.

Prepared by: _____

Signature

Print

Date

Attachment 9

**Emergency Procedures Implementing (EPI)
Functional Administrative Procedure (FAP)
MP-26-EPI-FAP05-005, "Media Center Liaison (MCL)"**

**Millstone Power Station Units 1, 2 and 3
Dominion Nuclear Connecticut, Inc. (DNC)**

3-15-04

Approval Date

3-19-04

Effective Date

Media Center Liaison (MCL)

This form provides guidance for Media Center Liaison emergency response actions during an emergency that activates the SERO.

Section A: Initial Actions

- 1. Report to the Nuclear News Manager (NNM) at the SEOC at the State Armory in Hartford.
- 2. Request a briefing from the NNM on the status of events up to that time.
- 3. Review issued IRFs and news releases for information previously released.
- 4. Introduce self to state Media Center Supervisor.

Section B: Recurring Actions

NOTE

TVs should be shut off during news briefings.

- 1. Attend formal news briefings and stand at the back of the JMC.
- 2. Post all Dominion news releases in JMC.
- 3. Support state Media Center Supervisor.
- 4. Act as facilitator to field generic technical and radiological questions of the media by directing them to the Technical and Radiological Briefers.
- 5. Collect the questions unanswered by the Chief Technical Spokesperson (CTS), the Radiological Briefer, or the Technical Briefer during formal news briefings and one-on-one interviews.
- 6. Provide these questions to the NNM for follow-up.
- 7. Coordinate with the Technical and Radiological Briefers to ensure answers obtained via the NNM are provided to the media.

Section B: Recurring Actions

8. Assist the state Media Center Supervisor in preparing public information support material at the JMC.
- Notebook to record JMC comments
 - Media Manual Distribution
 - Appropriate MP Unit Schematic (with approval of the NNM), including Protective Action Recommendation (PAR) chart and evacuation charts.
 - Check JMC wall phones for dial tone and TVs are turned to the appropriate stations, as requested.

Prepared by:

Signature

Print

Date

Attachment 10

**Emergency Procedures Implementing (EPI)
Functional Administrative Procedure (FAP)
MP-26-EPI-FAP05-008, "State Emergency Planning Liaison (SEPL)"**

**Millstone Power Station Units 1, 2 and 3
Dominion Nuclear Connecticut, Inc. (DNC)**

3-15-04
Approval Date

3-19-04
Effective Date

State Emergency Planning Liaison (SEPL)

This form provides guidance for State Emergency Planning Liaison emergency response actions during an emergency that activates the SERO.

Section A: Initial Actions

- 1. Notify the Nuclear News Manager (NNM), State Office of Emergency Management (OEM), and the Operations Officer of your arrival in the SEOC at the State Armory in Hartford.
- 2. Maintain a log of significant events and activities.
- 3. Verify operability of communications equipment between the station and the SEOC.
- 4. Receive a briefing from the NNM on the status of events up to that time.
- 5. Review issued IRFs and news statements for information previously released.

Section B: Recurring Actions

- 1. Coordinate response actions with the following:
 - State Operations Officer to ensure efficiency of actions.
 - NY SEMO Representative to provide information on station activities.
- 2. Assist the SEOC staff with questions on implementation of the Emergency Plan or implementing procedures.
- 3. Attend SEOC staff briefings.
- 4. Assist State OEM Staff and Millstone/Dominion personnel as requested.

Prepared by:

Signature

Print

Date