

GRAND GULF NUCLEAR STATION EIE SUBMISSION

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TITLE	GRAND GULF NUCLEAR STATION EMERGENCY PREPAREDNESS PROCEDURE: 01-S-10-3, Revision 12, EMERGENCY PREPAREDNESS DEPARTMENT RESPONSIBILITIES
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REGULATION GOVERNING SUBMISSION	10CFR50.4(b)(5)
SUBMISSION CONTACT INFORMATION	MICHAEL LARSON PH 601-437-6685 EMAIL: MLARSON@ENTERGY.COM

PLANT OPERATIONS MANUAL

Volume 1

01-S-10-3

Section 10

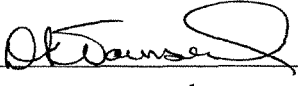
Revision: 12

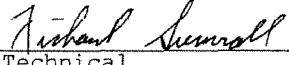
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ADMINISTRATIVE PROCEDURE

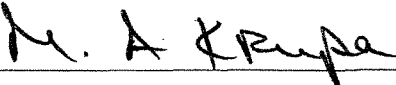
EMERGENCY PREPAREDNESS DEPARTMENT RESPONSIBILITIES

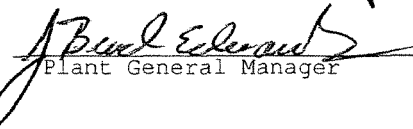
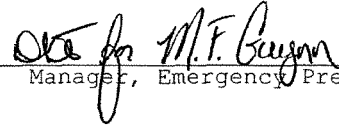
SAFETY RELATED

Prepared: 

Reviewed: 
Technical

Concurred: 
Manager, Operations

OSRC: 

Approved:  Plant General Manager,  Manager, Emergency Preparedness


List of Effective Pages:

Pages 1-17

Attachments I-V

List of TCNs Incorporated:

<u>Revision</u>	<u>TCN</u>
0	None
1	None
2	1
3	None
4	None
5	None
6	None
7	None
8	None
9	None
10	None
11	None
12	None

	EN-S NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED ADMINISTRATIVE	LI-101	Revision 3		
ATTACHMENT 9.1		50.59 REVIEW FORM	Page	1	of	5

I. OVERVIEW / SIGNATURES

Facility: Grand Gulf Nuclear Station

Document Reviewed: 01-S-10-3 Emergency Preparedness Department Responsibilities
Change/Rev.: 12

System Designator(s)/Description: N/A

Description of Proposed Change

Adds guidance to perform annual review and update on the GGNS ANS Report.

Revises names of State and Local Agencies that recently changed their agency names.

Updates the ANS operability determination to reflect the installation of the new control system.

Updates the procedure to reflect that the Maintenance Department now makes repairs to the Alert Notification System rather than a contractor.

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.)

<input checked="" type="checkbox"/>	SCREENING	Sections I, II, III, and IV required
<input type="checkbox"/>	50.59 EVALUATION EXEMPTION	Sections I, II, III, IV, and V required
<input type="checkbox"/>	50.59 EVALUATION (#: ____)	Sections I, II, III, IV, and VI required


Preparer: Richard Sumrall / *Richard Sumrall* / EOI / EP / 2-13-04
Name (print) / Signature / Company / Department / Date

Reviewer: Richard VanDerAkker / *Richard VanDerAkker* / EOI / EP / 2-16-04
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 Assisting/Contributing Personnel:

Name: N/A	Scope of Assistance: N/A
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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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Orders	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TS Bases	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Technical Requirements Manual	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Core Operating Limits Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Safety Evaluation Reports ¹	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

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

LBDs controlled under other regulations	YES	NO	CHANGE # (if applicable) and/or SECTIONS IMPACTED
Quality Assurance Program Manual ²	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Emergency Plan ²	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Fire Protection Program ³ (includes the Fire Hazards Analysis)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Offsite Dose Calculation Manual ³	<input type="checkbox"/>	<input checked="" type="checkbox"/>	


If "YES", evaluate any changes in accordance with the appropriate regulation AND 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
 If "yes," perform an Exemption Review per Section V OR perform a 50.59 Evaluation per Section VI.
3. Does the proposed activity potentially impact equipment, procedures, or facilities utilized for storing spent fuel at an Independent Spent Fuel Storage Installation? ☐ Yes
☐ No
☒ N/A
 (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.)

¹ If "YES," see Section 5.1.4. No LBD change is required.

² If "YES," notify the responsible department and ensure a 50.54 Evaluation is performed. Attach the 50.54 Evaluation.

³ If "YES," evaluate the change in accordance with the requirements of the facility's Operating License Condition.

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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 a keyword search of the Online Operating License, TechSpecs, NRC Orders, FSAR, TS Bases, TRM, COLR, SERs, QAPM, Emergency Plan, Fire Protection Plan and ODCM for the keywords siren, ANS and Alert Notification System.

Reviewed all hits returned. Emergency Plan section 7.5.4 describes construction and operation of the GGNS Alert Notification System but does not address the detail outlined in this procedure. This change does not affect the information contained within the Emergency Plan.

No other relevant hits were returned.

C. References

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:

Keywords:

Operating License, TechSpecs, NRC Orders, FSAR, TS Bases, TRM, COLR, SERs, QAPM, Emergency Plan, Fire Protection Plan and ODCM

siren, ANS and Alert Notification System.

LBDs/Documents reviewed manually:


Emergency Plan Section 7.5.4

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
☒ No

If "Yes," list the required changes.

N/A

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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 No

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. ☐ ☒ Involve a land disturbance of undisturbed land areas (i.e., grading activities, construction, excavations, reforestation, creating, or removing ponds)?
3. ☐ ☒ Involve dredging activities in a lake, river, pond, or stream?
4. ☐ ☒ 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. ☐ ☒ Discharge any chemicals new or different from that previously discharged?
7. ☐ ☒ 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. ☐ ☒ Modify existing stationary fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)?¹
11. ☐ ☒ 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)?¹
12. ☐ ☒ Involve the installation or use of equipment that will result in an air emission discharge?
13. ☐ ☒ 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. ☐ ☒ Involve burial or placement of any solid wastes in the site area that may affect runoff, surface water, or groundwater?

¹ See NMM Procedure EV-117, "Air Emissions Management Program," for guidance in answering this question.

GRAND GULF NUCLEAR STATION EMERGENCY PLAN PROCEDURE

Title: Emergency Preparedness Department Responsibilities	No.: 01-S-10-3	Rev. 12	Emergency Plan Evaluation
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10CFR50.54(q) Screening

1. DOCUMENT INFORMATION

Procedure/Document Number: 01-S-10-3	Proc./Doc. Revision: 12
Document Title: Emergency Preparedness Department Responsibilities	
<u>Brief Description of Proposed Revision: Adds guidance to perform annual review and update on the GGNS ANS Report. Revised names of State and Local Agencies that recently changed their agency's name. Updates the ANS operability determination to reflect the installation of the new control system. Updates the procedure to reflect that the Maintenance Department now makes repairs to the Alert Notification System rather than a Contractor.</u>	

2. SCREENING

<p>A.) Does the proposed revision require a change to the Emergency Plan? ___ Yes ___ X No</p> <p>Reason for 'No' response:</p> <p>Reviewed the applicable portions of the Emergency Plan. The Emergency Plan does not contain guidance on performing annual review and update on the GGNS ANS Report, ANS operability determination, repairs to the Alert Notification System or the other administrative changes made in this procedure revision. This procedure revision also implements changes made in revision 51 of the E-Plan. This revision does not change or affect the E-Plan and therefore does not decrease the effectiveness of the Emergency Plan.</p> <p>B.) Does the proposed revision change the site Emergency Action Levels (EALs)? ___ Yes ___ X No</p> <p>Reason for 'No' response:</p> <p>This administrative procedure does not contain any EAL information and therefore does not change the site EALs.</p> <p>If the answer to either question is YES, then a 50.54(q) evaluation must be performed.</p>
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3. APPROVAL

Prepared by: <u><i>OK Taunsmul</i></u>	Date: <u>1/30/04</u>
(Signature)	
Reviewed by: <u><i>F. J. Small</i></u>	Date: <u>2/12/04</u>
(Technical Reviewer)	
Approved by: <u><i>M. J. H.</i></u>	Date: <u>3/17/04</u>
(Manager, Emergency Planning)	

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RPTS FORM

10CFR50.59 Review Required?	(X) Yes	If Yes, attach 50.59 Review Form
	() No	Not required per LI-101

Cross-Discipline review required?	() Yes	(Note affected Departments Below)
	(X) No	
Preparer Initials>>>	OKT	

Department Cross-Discipline Reviews Needed	Signoff (signed, electronic, telcon)

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

REQUIREMENTS CROSS-REFERENCE LIST

Requirement Implemented Name	by Directive Paragraph Number	Directive Paragraph Number That Implements Requirement
10CFR50	4(b) (5)	6.4.7.b
10CFR50	54(t) (1) (2)	6.2.2
10CFR50	54(q)	6.4
FSAR	9B.8.5.S5	6.5.3
FSAR	13.3 Para 2	6.4.1.b
FSAR	13.1.1.2.1.2.1	1.2.1, 2.3
GGNS Emer Plan	5.4 S5	2.8
GGNS Emer Plan	8.2.3.S1, 8.2.S3	6.5.3
GGNS Emer Plan	8.4.S1	2.3
GGNS Emer Plan	8.4.S1(a), (b)	2.4.8, 2.4.9
GGNS Emer Plan	8.4.S1(c)	2.4.6, 2.4.12
GGNS Emer Plan	8.4.S1(d)	6.1.2, 6.1.3, 6.12
GGNS Emer Plan	8.4.S1(e)	2.4.5, 6.1.1
GGNS Emer Plan	8.4.S1(f)	6.8.1, 2.4.11
GGNS Emer Plan	8.4.S6	6.7
GGNS Emer Plan	8.4.S7	6.5.2
GGNS Emer Plan	8.5.S1	6.4.1.a
GGNS Emer Plan	8.6.S4	6.9.2
GGNS Emer Plan	8.5 S6,S9,S10,S13,S11,S7,S8	2.5, 6.2
GGNS Emer Plan	8.5 S12	2.4.1
GGNS Emer Plan	8.5 S18	6.1.14
GGNS Emer Plan	8.5.S15, S16	6.4
GGNS Emer Plan	8.5.S19	6.4.6.a(3) & 2.8
AECM 88/0253	II.S8,S9	6.3.3.c, 6.3.5.a
AECM-89/0061	89-03-02 Att, Para III.b.2	6.3.6
GGCR 1997-0740-00	*	6.1.14, 2.4.12

* 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 ☐ Yes ☒ N/A CDBCR # _____

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Current Revision Statement

Revision 12:

- Adds guidance to perform annual review and update on the GGNS ANS Report.
- Revised names of State and Local Agencies that recently changed their agency's name.
- Updates the ANS operability determination to reflect the installation of the new control system.
- Updates the procedure to reflect that the Maintenance Department now makes repairs to the Alert Notification System rather than a Contractor.

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1.0 PURPOSE AND DISCUSSION

1.1 Purpose

- 1.1.1 To describe the responsibilities and organizational structure of the Emergency Preparedness (EP) staff.
- 1.1.2 To provide guidance for the overall maintenance of the Emergency Preparedness Program and ensure the program meets all established requirements and commitments.
- 1.1.3 To define the responsibilities for maintenance and control of the GGNS Emergency Plan and implementing procedures (from now on referred to as Emergency Plan or Plan).
- 1.1.4 To provide for the establishment, implementation, and documentation of a training and indoctrination program for the Emergency Preparedness (EP) staff.

1.2 Discussion

- 1.2.1 Manager, Emergency Preparedness reports to the Director, Nuclear Safety Assurance and is responsible for the Emergency Preparedness Program and associated activities.

2.0 RESPONSIBILITIES

2.1 All GGNS Superintendents and above - Are responsible for:

- 2.1.1 Ensuring compliance with commitments of the GGNS Emergency Plan that affect their area of responsibility.
- 2.1.2 Providing support to the Manager, Emergency Preparedness for the conduct of emergency preparedness exercises.

2.2 Director, Nuclear Safety Assurance is responsible for the following:

- 2.2.1 Transmitting revisions/changes to the Emergency Plan and Implementing Procedures to the NRC within 30 days of their implementation in accordance with Reference 3.1.
- 2.2.2 Ensuring that changes Emergency Plan which require prior approval are submitted to the NRC.

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2.3 Manager, Emergency Preparedness - Is responsible for:

- 2.3.1 Supervising the development, administration, management, maintenance, and exercising of the Emergency Preparedness Program to ensure compliance with applicable NRC rules, regulations and requirements.
- 2.3.2 The direction of activities in support of the Emergency Preparedness Program and for the establishment and maintenance of this procedure.
- 2.3.3 The overall direction and control of the methods for administrative and technical activities related to preparation, maintenance, and control of the Emergency Plan.
- 2.3.4 Ensuring the training of the Emergency Preparedness staff includes:
 - a. Defining minimum training requirements.
 - b. Coordinating and obtaining training resources from outside organizations, as required.
- 2.3.5 The maintenance of Dose Assessment Program and control of the dose calculation software.

2.4 Manager, Emergency Preparedness or designee - Is responsible for the following:

- 2.4.1 Providing ongoing review of the activities related to the Emergency Preparedness Program.
- 2.4.2 Coordinating local and state emergency preparedness requirements and activities with those planned by Grand Gulf Nuclear Station (GGNS).
- 2.4.3 Ensuring that emergency response facilities, including specialized equipment and reference materials, are maintained in a state of readiness and available for use.
- 2.4.4 Identifying and scheduling emergency planning activities on an annual basis.
- 2.4.5 Conducting periodic reviews of the Emergency Plan and Emergency Preparedness Administrative Procedures as required by 10CFR50, Appendix E and 10CFR50.54(t).
- 2.4.6 Coordinating with the GGNS Training Department in defining and scheduling emergency preparedness training.
- 2.4.7 Coordinating scenario preparation and conduct of the biennial exercise.
- 2.4.8 Reviewing the GGNS Emergency Plan to ensure compliance with regulatory requirements, and to ensure it is consistent with state and local plans, and the GGNS Security Plan.
- 2.4.9 Reviewing Emergency Plan procedures to ensure they are consistent with Administrative, Security, Radiation Protection, and Training procedures, the Emergency Plan, and with each other.

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- 2.4.10 Distributing revisions to the Emergency Plan or EPPs to the NRC within 30 days of their implementation, as specified in 10CFR50.4(b)(5).
- 2.4.11 Establishing the schedule and conducting media training for the news media on emergency information, and the publication and distribution of the Public Information Publication.
- 2.4.12 Communicating Emergency Preparedness Program changes, deemed significant, to plant staff and the Emergency Response Organization.
- 2.4.13 Ensuring that any changes made to the Emergency Plan are evaluated under 10CFR50.54(q) to determine if the effectiveness of the Emergency Plan will be decreased.
- 2.4.14 Ensuring changes made to the Emergency Plan Implementing Procedures are screened to determine if an Emergency Plan change is required.
- 2.4.15 Coordination with state and local emergency preparedness officials on establishing dates for training of offsite support agencies, and the biennial NRC graded exercise if offsite support agencies participate.

NOTE

Manager, Emergency Preparedness (MEP) or designee may develop and distribute a schedule identifying significant emergency preparedness activities including emergency preparedness drills and exercises.

- 2.4.16 Reviewing information from drills and exercises, and address, as appropriate, corrective action to ensure implementation.
- 2.5 Manager, Quality Assurance - Is responsible for establishing the schedule for emergency preparedness audits by Quality Assurance and shall ensure an independent audit of the Emergency Preparedness Program is conducted.
- 2.6 Manager, Nuclear Computing & Information Systems, through the Computer Engineering Section, maintains all Emergency Dose Calculations Source Codes.
- 2.7 Plant General Manager provides overall direction for those site-specific activities which support the Emergency Preparedness Program.
- 2.8 Site Vice President - Is responsible for:
 - 2.8.1 Establishing management direction and control for the Emergency Preparedness Program to ensure preparedness is maintained and any required corrective actions are implemented, through the Director, Nuclear Safety Assurance.
 - 2.8.2 Designating personnel to fill emergency response organization positions, through GGNS Management.

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3.0 REFERENCES

- 3.1 Code of Federal Regulations 10CFR50
- 3.2 NUREG 0654
- 3.3 GGNS Final Safety Analysis Report
- 3.4 Quality Assurance Procedure Manual (QAPM)
- 3.5 Grand Gulf Nuclear Station Emergency Plan
- 3.6 GGNS Plant Operations Manual
 - 3.6.1 01-S-10-4, Emergency Preparedness Drills and Exercises
 - 3.6.2 01-S-06-5, Reportable Events or Conditions
- 3.7 Nuclear Management Manual (NMM) Procedure
 - 3.7.1 LI-102, Corrective Action Process
 - 3.7.2 OM-119, Onsite Safety Review Committee
 - 3.7.3 EP-305, 10CFR50.54(q) Review Program
 - 3.7.4 TQ-110, Emergency Preparedness Training Program
- 3.8 FEMA Evaluation of Significant Changes to Alert & Notification (A&N) System (GIN 2004/00074)

4.0 ATTACHMENTS

- 4.1 Attachment I - Required Reading Checklist
- 4.2 Attachment II - Emergency Plan Revision Cover Sheet
- 4.3 Attachment III - Emergency Plan Change Cover Sheet
- 4.4 Attachment IV - Request for and Documentation of Emergency Action Level Review by Offsite Agencies
- 4.5 Attachment V - Significant Changes to Alert & Notification (A&N) Systems

5.0 DEFINITIONS

5.1 GGNS Emergency Plan

The GGNS Emergency Plan is an action plan prepared in accordance with the requirements of 10CFR50 and the guidance of NUREG 0654 to control and direct the response of Emergency Response Organizations to a plant emergency condition as defined in the Plan. The Emergency Plan constitutes Section 13.3 of the GGNS FSAR.

5.2 Implementing Procedures

Emergency Plan Procedures (EPPs) provide detailed direction for the Emergency Response Organization and implement actions directed by the Emergency Plan. EPPs are located in Volume 10 of the Plant Operations Manual.

5.3 Plan Change - A handwritten change to the Emergency Plan.

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5.4 Plan Revision - The formal revision of the Emergency Plan which may incorporate one or more approved Plan Changes.

6.0 DETAILS

6.1 Emergency Preparedness Program

The Emergency Preparedness staff has the following general responsibilities:

- 6.1.1 Coordinate the annual and periodic reviews, revision, and distribution of Emergency Preparedness (EP) documents, such as the GGNS Emergency Plan and Emergency Preparedness Procedures.
- 6.1.2 Develop scenarios for drills and exercises as defined by the Emergency Plan.
- 6.1.3 Periodically conduct and participate in drills and exercises to evaluate major portions of emergency response capabilities and federal agencies, and make a timely submission of required reports about these activities.
- 6.1.4 Establish and maintain communications to promote mutual understanding with other departments, federal, state, and local agencies involved in GGNS Emergency Preparedness Program.
 - a. Provide primary communications contact with NRC.
 - b. Periodically meet with federal, state, and local support agencies to establish schedules, coordinate training, and ascertain overall EP status.
 - c. Provide liaison with industry committees and working groups involved in emergency preparedness, and represent GGNS at Regional Utility Group meetings.
 - d. Interact with other departments to ensure the Emergency Response Organization is staffed with qualified personnel and maintained in a state of readiness.
 - e. Provide necessary contact with responsible audit groups to ensure the success of the EP program.
- 6.1.5 Ensure the readiness of Emergency Response Facilities (ERF).
 - a. Maintain ERF inventories.
 - b. Conduct operational checks of essential emergency equipment.
- 6.1.6 Establish goals and objectives for the EP staff that support the Emergency Preparedness Program.
- 6.1.7 Develop and maintain schedules of Emergency Preparedness Tasks.
- 6.1.8 Ensure that EP activities are performed in accordance with Operational Quality Assurance Program requirements.
- 6.1.9 Develop responses to NRC questions, audits, and inspections relative to Emergency Preparedness, and provide regulatory reports as required.

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- 6.1.10 List, track, and identify program deficiencies; schedule, monitor, and resolve listed action items; and recommend any necessary corrective actions to preclude recurrences.
- 6.1.11 Ensure state and local emergency plans and letters of agreement are reviewed on an annual basis; and necessary funding is made available through the budgeting process for state and local agency EP activities.
- 6.1.12 Ensure all changes that may have an affect on the EP Program are evaluated for input on the Emergency Plan and Emergency Preparedness commitments.
- 6.1.13 Monitoring routine polls of the Alert and Notification System to ensure proper operation level is maintained and reporting any problems to the Maintenance Department.
- 6.1.14 Communicating Emergency Preparedness Program changes deemed significant, to Plant staff, Emergency Response Organization, and other Emergency Organizations (State, Local, etc.) by one or more of the following methods:
 - a. Training sessions following the Morning Meetings
 - b. EP Hotlines
 - c. Required Reading Program
 - d. Special Meetings as necessary

6.2 Inspections and Audits

- 6.2.1 The EP staff is responsible for:
 - a. Coordinating regulatory and industry group inspections and auditing activities related to the Emergency Preparedness Program.
 - b. Developing responses to deficiencies and findings.
 - c. Recommending to Entergy Operations management that responses per Step 6.2.1.b be transmitted to the associated regulatory, industry, or local/state group.
 - d. Ensuring the timely resolution of emergency preparedness deficiencies, violations, nonconformances, and items of concern identified during Quality Assurance audits and NRC inspections.
 - e. If appropriate, assign action items in response to identified deficiencies and findings to responsible Entergy Operations personnel.

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6.2.2 Ensuring an audit of the emergency preparedness program which constitutes an independent review, as required by 10CFR50.54(t), is performed at intervals not to exceed 12 months or, as necessary, based on an assessment by the licensee against performance indicators, and as soon as reasonably practicable after a change occurs in personnel, procedures, equipment, or facilities that potentially could adversely affect emergency preparedness, but no longer than 12 months after the change. In any case, all elements of the emergency preparedness program shall be reviewed at least once every 24 months. The audit is performed under the direction of the Manager, Quality Assurance.

- a. The auditors shall have no direct responsibility for implementation of the Emergency Preparedness Program.
- b. The part of the audit involving evaluation for adequacy of interface with state and local governments shall be available to the appropriate state and local governments.
- c. Any findings from the audit, along with recommendations for improvement, shall be:
 - (1) Documented
 - (2) Reported to the Manager, Emergency Preparedness; Director, Nuclear Safety Assurance; Site Vice President; and affected groups.
 - (3) Maintained for a period of five years.
- d. The review must include an evaluation for adequacy of interfaces with state and local governments and of drills, exercises, capabilities and procedures.
- e. Personnel performing reviews or audits of the Plan and/or Emergency Plan Procedures take into account and review corporate policy, state policy and plans, local plans, and the various agreements and understandings with federal, state, and local support agencies and organizations.

6.3 Alert and Notification System (ANS)

6.3.1 Siren tests (Growl or Complete Cycle) are conducted by the Claiborne County Civil Defense (CCCD) and Tensas Parish Office of Homeland Security and Emergency Preparedness (TPHS&EP) agencies, and generally scheduled for 11:30 a.m. for Tensas Parish and 12:00 noon for Claiborne County, on the first Monday of each month. At the discretion of the local agency directors, monthly siren tests may be rescheduled or canceled.

6.3.2 Approximately one hour (but not to exceed two hours) following the completion of the scheduled monthly siren test, the Manager, Emergency Preparedness or designee contacts the respective agencies to determine siren operability.

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- 6.3.3 The siren operability percentage is determined for the total system after each siren test as follows:

- a.
$$\frac{\# \text{ operable sirens } \text{Claiborne County}}{\# \text{ operable sirens } \text{Tensas Parish}} + \frac{43 \times 100}{\text{total sirens}} = \frac{\% \text{ op. total system}}{\text{total system}}$$
- b. A siren's operability is determined by:
- (1) An "X" under the "Activation & Growl Test Pass" heading on the feedback report, or
 - (2) Manual verification by local agency or utility personnel stationed at a siren site during the scheduled test, or
 - (3) Manual verification by local agency or utility personnel responding to the siren site for a subsequent growl test verification, or
 - (4) Local residents near a siren site verify the siren sounding.
- c. If the percent operability (% op.) for the total system is less than 75%, the Control Room is notified immediately so the required one-hour notification can be made pursuant to 10CFR50.72(b) (1) (v) and 01-S-06-5. Corrective actions to repair inoperable sirens are initiated immediately by notification of the Maintenance Department.

- 6.3.4 Upon determining that a portion of the general public would not be properly alerted of an emergency by the Alert Notification System (less than 75% of sirens operable in Claiborne County and/or Tensas Parish), GGNS Emergency Preparedness personnel should contact the appropriate Civil Defense Director to ensure Sheriff's office notification for route alerting is made. Additionally, the affected state agency (MEMA or LHS&EP/LDEQ) is notified. Notification should be document by a letter to file.

6.3.5 Unplanned Siren Activations

- a. When the Emergency Preparedness (EP) staff is advised of an unplanned activation of one or more of the ANS sirens, EP ensures that the Control Room is notified and the incident reported in accordance with 01-S-06-5.
- b. Emergency Preparedness coordinates with Corporate Communications in development and subsequent release of news bulletins as appropriate. If a news bulletin is released, EP ensures that the Control Room is notified and reported in accordance with 01-S-06-5.
- 6.3.6 Annual ANS Training will be conducted by GGNS Emergency Preparedness for Claiborne County Civil Defense, Claiborne County Sheriff's Office, Tensas Parish Office of Homeland Security and Emergency Preparedness, and Tensas Parish Sheriff's Office.
- 6.3.7 ANS trending shall be performed quarterly to identify any negative trends across the system. If a trend is identified, it should be entered into the corrective action process and tracked to resolution.

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6.3.8 Review and Updating the ANS Report

- a. The ANS Report should be maintained as a living document in accordance with 44CFR350 Part 14b and FEMA REP 10.
- b. For any planned changes to ANS equipment/processes which would cause the ANS Report to be revised, Mississippi Emergency Management Agency and Louisiana Office of Homeland Security and Emergency Preparedness should be notified.
- c. FEMA Region IV and VI should be notified via email (if expeditious approval is required) and/or by formal letter of planned changes.
- d. Significant changes (See Attachment V) as described in 44CFR350, should require a revision to the ANS Report and be submitted to FEMA Region IV and VI for review and approval prior to the implementation of the change. This level of change may require an independent Quality Assurance engineering review (normally paid for by FEMA) and may require additional verification measures as described in FEMA REP 10 to validate the change effectiveness. This determination is made by FEMA.
- e. Minor changes (telephone number changes, typo corrections, etc.) should be submitted to FEMA regions IV and VI, but do not require the level of evaluation mentioned in step (d) above.

6.4 Control of GGNS Emergency Plan

6.4.1 Annual Review

- a. The Emergency Plan shall be reviewed on an annual basis and updated by revision, as necessary. The Annual review should be documented by a letter to file. The annual review shall include the review by state/local agencies of the Emergency Action Levels as required by 10CFR50, Appendix E, Paragraph IV.B.
 - (1) State/local agency reviews are requested by a letter similar to Attachment IV. This letter is addressed to the following individuals:
 - (a) Director, Mississippi Emergency Management Agency
 - (b) Director, Claiborne County Civil Defense
 - (c) Program Manager, Louisiana Department of Environmental Quality, Radiological Emergency Planning and Response
 - (d) Tensas Parish Office of Homeland Security and Emergency Preparedness Coordinator
 - (e) Director, Mississippi State Board of Health, Division of Radiological Health
 - (f) Assistant Director, Louisiana Office of Homeland Security and Emergency Preparedness

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6.4.1 (Cont.)

- b. Supporting Emergency Response Plans to the GGNS Emergency Plan have been developed by offsite organizations and agencies and are maintained separately from the GGNS Emergency Plan by the responsible offsite organization/agency. The supporting emergency plans are reviewed as requested, and comments forwarded to the controlling organization as necessary. Revisions to the supporting emergency plans are submitted to the NRC in accordance with Section 6.4.7 as they are provided to GGNS by the various organizations.
- c. Letters of Agreement are reviewed with the affected signatory organization on an annual basis and updated as necessary. A change in signatory(ies) to a given Letter of Agreement does not in itself require revision of that letter; however, a change in applicability of the content of a Letter of Agreement does require a revision.

6.4.2 Emergency Plan revisions are evaluated in accordance with Reference 3.7.3.6.4.3 Plan Change Origination and Evaluation

- a. Plan Changes may be requested by:
 - (1) Any person within Entergy Operations; by state, local, or federal emergency response agencies (e.g., Nuclear Regulatory Commission).
 - (2) Notifying the Manager, Emergency Preparedness in writing.
 - (3) Telephone communications with the Manager, Emergency Preparedness.
- b. The Manager, Emergency Preparedness reviews all proposed Emergency Plan changes.

6.4.4 Preparation of Emergency Plan Revisions

- a. The Manager, Emergency Preparedness or his designee prepares an initial draft of an Emergency Plan revision as follows:
 - (1) Using the latest approved revision of the Emergency Plan, indicate the changes required by either hand-marking copies of the affected pages or typing pages in the same format as the Emergency Plan.
 - (2) Only the affected pages need be revised and issued. The lower right-hand corner of each revised page indicates the applicable revision number, which must coincide with the new revision number of the Plan to be issued and date (month/year) in which the revision is intended for issuance.

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6.4.4 (Cont.)

- (3) When a Plan Revision requires the deletion without substitution of all of the text on a page, the page is not deleted from the Plan. The page is removed and replaced by a revised page with the same number, appropriate revision number, and date showing only the phrase "TEXT DELETED" centered on the revised page.
- (4) The revised portion of each page is indicated by a bold vertical line in the right-hand margin of the page beside the revised material. If the entire page is being revised, the vertical line extends the entire length of printed material on the page.
- (5) The Emergency Plan Revision Cover Sheet, Attachment II, is marked with the revision number. The final version for approval and release is designated as "Revision ____" on the Plan cover sheet and all revised pages.
- (6) The date of the last signatory (Site Vice President) and the revision date in the upper-right corner of the cover sheet are the same. The effective date and signature date are consistent with the date on each page of the revision.

6.4.5 Review of Emergency Plan Revisionsa. Manager, Emergency Preparedness or his designee

- (1) Presents copies of the draft Plan Revision to the site personnel, if appropriate, for review and concurrence.
- (2) Upon receipt of review comments, resolves or incorporates all comments; prepares a subsequent draft, if required; and submits the draft, revised in accordance with the review comments, for approval signatures.

6.4.6 Approval and Distribution of Emergency Plan Revisions and Changesa. Manager, Emergency Preparedness

- (1) Documents evaluation of the continued effectiveness of the revised Plan by signing the 10CFR50.54(q) Evaluation Checklist of Ref. 3.7.3 to indicate that this evaluation has been completed.
 - (a) If the 10CFR50.54(q) Evaluation concludes that the revision/change would decrease the Emergency Plan's effectiveness, forwards the revision/change to the Director, Nuclear Safety Assurance. Director, Nuclear Safety Assurance shall submit the revision/change to and gain approval from the NRC, before the revision/change can be implemented.

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6.4.6 (Cont.)

- (2) Assembles the following documents to accompany the revision/change through the approval cycle:
 - (a) Emergency Plan Revision/Change Cover Sheet (similar to Attachment II/III)
 - (b) List of Effective Pages
 - (c) Plan Revision/Change Pages
 - (d) 10CFR50.54(q) Evaluation Checklist (Ref. 3.7.3)
- (3) Approves the revision/change package formed by the above documents by signature on the Emergency Plan Revision/Change Cover Sheet and ensures the revision/change package is reviewed and approved by the following:
 - (a) Director, Nuclear Safety Assurance
 - (b) OSRC
 - (c) Plant General Manager
 - (d) Site Vice President
- (4) Forwards the revision/change to Nuclear Safety Assurance for distribution to Emergency Plan custodians.
- (5) Files and retains all records of reviews and concurrences related to the revision/change.

6.4.7 Submittal of Emergency Plan and Implementing Procedure Revisions to the Nuclear Regulatory Commissiona. Emergency Plan Revisions

- (1) Manager, Emergency Preparedness provides copies of the revised emergency plan and/or implementing procedure to the Director, Nuclear Safety Assurance for transmittal to the NRC per Reference 3.1.

- b. Emergency Plan and Emergency Plan Implementing Procedures revisions are addressed and distributed to the NRC in accordance with 10CFR50.4(b)(5).

6.4.8 Evaluation of Changes to the GGNS Facility and other changes that may affect the Emergency Plan.

- a. The following items must be reviewed for impact on the Emergency Plan:
 - (1) Emergency Plan implementing procedure revisions and TCNs
 - (2) EOI Organization changes (GGNS related)
 - (3) GGNS Facility changes (Maintenance Shop, 177' Control Building, ESC Building)

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6.4.8 (Cont.)

- (4) Updated Final Safety Analysis Report changes
- (5) Any offsite (Emergency Plan related) changes
- (6) Any other changes that may affect implementation of the Emergency Plan

6.5 Training

6.5.1 Training of Emergency Response Organization personnel is conducted in accordance with TQ-110.

6.5.2 Training of Emergency Preparedness Staff

a. Manager, Emergency Preparedness:

- (1) Ensures that before assignment of duties and responsibilities involving quality affecting activities, new personnel have completed a required reading list as a prerequisite to such assignment.
- (2) Assigns required reading as necessary, and documents on forms similar to Attachment I.

6.5.3 Coordinating scheduling and training requirements with offsite support agencies and Entergy Operations departments.

- a. Members of local offsite support agencies, including local fire and law enforcement agencies, ambulance and hospital services, receive training during the second quarter of each calendar year, with training dates to be scheduled during the first quarter of each calendar year.

6.6 Drills and Exercises are conducted in accordance with Reference 3.6.1.

6.7 Local/State Interface

6.7.1 The Manager, Emergency Preparedness or designee maintains communication with the appropriate officials from Mississippi Department of Emergency Management Agency (MEMA), Louisiana Department of Environmental Quality (LDEQ), Claiborne County Civil Defense (CCCD), Tensas Parish Office of Homeland Security and Emergency Preparedness (TPHS&EP), Mississippi State Board of Health, Division of Radiological Health, and Louisiana Office of Homeland Security and Emergency Preparedness (LHS&EP), regarding the overall status of emergency preparedness. Actions taken by GGNS that could potentially impact state/local planning should not be initiated without their prior concurrence.

6.7.2 At the discretion of the Manager, Emergency Preparedness, local and state agency officials may be provided with copies of correspondence in the possession of GGNS related to their emergency preparedness responsibilities.

6.8 Emergency Public Information/News Media Emergency Information

6.8.1 The EP staff prepares the Emergency Public Information Publication, and conducts the News Media Emergency Information training on an annual basis.

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6.9 Emergency Telephone Book

- 6.9.1 An Emergency Telephone Book containing the telephone numbers of emergency response facilities and personnel is maintained and copies distributed for use at all Emergency Response Facilities.
- 6.9.2 The Emergency Telephone Book is updated quarterly as follows:
- Title page is updated with the current quarter
 - Call each number on the GGNS Emergency Facility Phone list to verify the numbers have not changed. If numbers have changed, update as necessary.
 - Contact Emergency Preparedness for updated copy of the call tree.
 - Contact Emergency Preparedness for an alphabetic listing of ERO members with home, work, and pager numbers.
 - Distribute alphabetic listing of ERO to each Department secretary for verification of home, work & pager numbers. If changes received, update list as necessary. Ensure Emergency Preparedness is notified of changes received from Department secretaries.
 - Call agencies and support personnel for verification of numbers. If numbers have changed, update as necessary.
 - Call industries and contract organizations for verification of numbers. If numbers have changed, update as necessary.
 - Call fire and medical organizations to verify numbers. If numbers have changed, update as necessary.
 - Call media listings for verification of numbers. If numbers have changed, update as necessary.
 - Verify facsimile/tele-copier numbers of various organizations. If numbers have changed, update as necessary.
 - Distribute updated Emergency Telephone Book.

6.10 ERO Call Tree

- 6.10.1 An Emergency Response Organization Call Tree containing the names, offices numbers, home numbers, and pager numbers is produced and distributed on a monthly basis. This Call Tree is in a flow-chart form and consists of the persons who fill the minimum staffing positions for the TSC, OSC, and EOF.

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6.11 Real Event Reporting

6.11.1 The Manager, Emergency Preparedness is responsible for generating a report on any activation of the Emergency Plan. The report should include the following:

- a. Copies of appropriate paperwork generated by the event including: notification forms, checklists, logbooks, survey maps, dose calculations, etc.
- b. Observations and comments from the personnel involved in the event.

6.11.2 The Manager, Emergency Preparedness is responsible for ensuring that all observations and comments are tracked in the Emergency Preparedness Action Tracking System, as appropriate.

6.12 Emergency Preparedness Action Tracking System (EPATS)

6.12.1 Manager Emergency Preparedness will, as appropriate, track items from drills, exercises, inspection reports, staff findings, etc. to ensure that each item is addressed and closed.

6.12.2 After the end of each calendar quarter the EPATS items entered during that quarter are reviewed to determine if they are repeat items, (items previously identified in past quarters.)

6.12.3 All repeat items are evaluated to determine if they meet the criteria of Reference 3.6.2 or 3.7.1. Any items meeting the criteria in these references are documented on a Condition Report in accordance with Reference 3.7.1.

6.12.4 The Manager, Emergency Preparedness, or his designee, documents the results of the Quarterly EPATS by letter, and a copy of the letter is submitted to Nuclear Records.

6.13 Emergency Plan Implementing Procedures are screened in accordance with Reference 3.7.3.

7.0 EMERGENCY DOSE CALCULATION SOFTWARE AND SOURCE CODE CONTROL

NOTE

The Manager, Nuclear Computing and Information System, through the Computer Engineering section, maintains all emergency dose calculation source codes, including a Configuration Management Plan and a Maintenance Procedure/Plan.

7.1 The Manager, EP is responsible for:

- 7.1.1 The current documentation of the computer software including initial system test results, results of software revision tests, and users manuals.
- 7.1.2 The locations of all authorized installations of the dose assessment software.
- 7.1.3 Documentation of commitment compliance.

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- 7.1.4 Authorizing the implementation of software modifications.
- 7.1.5 Ensuring appropriate technical reviews have been completed before authorizing software modification.
- 7.1.6 Ensuring satisfactory completion of all testing before releasing revised software for use and testing after installation in the field.
- 7.1.7 Maintaining administrative control of source code.
- 7.1.8 Notifying the Training and Chemistry/Radiation Control Departments of software changes.
- 7.1.9 Ensuring appropriate state agencies are informed of significant changes to the computer software.
- 7.1.10 Ensuring changes to the software are forwarded to the Manager, Training & Development for incorporation into the appropriate training program.
- 7.1.11 Ensuring that procedures for the use of the software are updated to reflect software changes.
- 7.1.12 Ensuring that GGNS onsite computers requiring current copies of approved dose calculation software are updated when software revisions are issued.
- 7.1.13 Ensuring that designated users are informed of software revisions.
- 7.1.14 Designating an individual(s) to act as system manager to control software installation on authorized computer locations.

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REQUIRED READING CHECKLIST

Employee's Name: _____ Date: _____

Employee's SSN: _____

Employee's Position: _____

Supervisor's Name: _____

By my signature I certify that I have completed the required reading on the date shown and that I understand the material covered.

	<u>Reading Material Title</u>	<u>Pages</u>	<u>Date</u>	<u>Employee Signature</u>
1.	_____	_____	_____	_____
2.	_____	_____	_____	_____
3.	_____	_____	_____	_____
4.	_____	_____	_____	_____
5.	_____	_____	_____	_____
6.	_____	_____	_____	_____
7.	_____	_____	_____	_____
8.	_____	_____	_____	_____
9.	_____	_____	_____	_____
10.	_____	_____	_____	_____
11.	_____	_____	_____	_____
12.	_____	_____	_____	_____
13.	_____	_____	_____	_____
14.	_____	_____	_____	_____
15.	_____	_____	_____	_____
16.	_____	_____	_____	_____
17.	_____	_____	_____	_____
18.	_____	_____	_____	_____

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EMERGENCY PLAN REVISION COVER SHEET

EXAMPLE

Revision No. _____

Date _____

GRAND GULF NUCLEAR STATION**EMERGENCY PLAN****NON-SAFETY RELATED**

Implementation of this revision will not decrease the effectiveness of the Emergency Plan, and the Plan will continue to meet the standards of 10CFR50.47(b) and the requirements of 10CFR50, Appendix E.

Preparer: _____
Emergency Preparedness

Reviewed/Approved: _____
Manager, Emergency Preparedness

Reviewed/Approved: _____
Director, Nuclear Safety Assurance /Date

Reviewed/Approved: _____
Chairman, Onsite Safety Review Committee/Date

Reviewed/Approved: _____
Plant General Manager /Date

Reviewed/Approved: _____
Site Vice President /Date

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EMERGENCY PLAN CHANGE COVER SHEET

EXAMPLE

Change No. _____

Date _____

GRAND GULF NUCLEAR STATIONEMERGENCY PLANNON-SAFETY RELATED

Implementation of this change will not decrease the effectiveness of the Emergency Plan, and the Plan will continue to meet the standards of 10CFR50.47(b) and the requirements of 10CFR50, Appendix E.

Preparer: _____

Emergency Preparedness

Reviewed/Approved: _____

Manager, Emergency Preparedness

Reviewed/Approved: _____

Director, Nuclear Safety Assurance /Date

Reviewed/Approved: _____

Chairman, Onsite Safety Review Committee/Date

Reviewed/Approved: _____

Plant General Manager /Date

Reviewed/Approved: _____

Site Vice President /Date

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REQUEST FOR AND DOCUMENTATION OF EMERGENCY ACTION
LEVEL REVIEW BY OFFSITE AGENCIES

EXAMPLE

Mr. Robert Latham
Director, MEMA
Fondren Station
Jackson, Mississippi

(Date)

Dear Mr. Latham:

SUBJECT: Grand Gulf Nuclear Station
Emergency Action Level Review

GEXO- _____ / _____

10CFR50, Appendix E, IV.B requires that "emergency action levels..." be reviewed with state and local government authorities on an annual basis. The emergency action levels for Grand Gulf Nuclear Station, which were developed in accordance with the guidance of NUREG-0654, are contained in Section 4.0 of the Plan and in GGNS Emergency Plan Procedure 10-S-01-1 (Attachment I).

We are currently preparing Revision ____ to the Emergency Plan. Please review Section 4.0 in your copy of the Plan and advise us of your comments by completing and returning the Concurrence Review Form (Attachment I) by _____ (date) _____.

If you have any questions, please contact Mr. M. F. Guynn at xxx-xxxx.

Yours truly,

Manager, Emergency Preparedness

MFG
Attachments

cc: Standard Distribution

EXAMPLE

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REQUEST FOR AND DOCUMENTATION OF EMERGENCY ACTION
LEVEL REVIEW BY OFFSITE AGENCIES

EXAMPLE

Attachment I to GEXO-____/____

I have reviewed the Grand Gulf Nuclear Station emergency action levels as contained in Section 4.0 of the Grand Gulf Nuclear Station Emergency Plan and in GGNS Emergency Plan Procedure 10-S-01-1; my comments are as follows:

- () Concur as written
() Comments attached

Name/Date_____
Title/Organization

Please return completed form to:

Manager, Emergency Preparedness
Grand Gulf Nuclear Station
P. O. Box 756
Port Gibson, Mississippi 39150

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Significant Changes to Alert & Notification (A&N) Systems

In accordance with 44CFR350.14 and Reference 3.8, a "significant change" involves any change to State and Local plans and preparedness that may affect its adequacy to protect public health and safety and must be processed and reviewed in the same manner as an initial plan submission.

As it relates to an A&N System, a "significant change" includes:

- A change in the EPZ boundaries requiring the addition of new alerting devices or changes the number of local governments that must be involved in alert and notification.
- A change in EPZ population requiring a change to the A&N system siren sound levels.
- Substituting one form of alerting for another (e.g., sirens for special alerting devices).
- Addition to or upgrading of alerting devices based on evidence of inadequate A&N system coverage.
- A change to maintenance methods that is not addressed in the design report.
- A change to testing methods that is not addressed in the design report.
- A loss of administrative control of special alerting devices that brings into question whether affected populations(s) can be notified in a timely manner.
- A change in siren locations and/or ratings not explicitly considered as acceptable by the FEMA technical evaluation.
- A change to the siren control system that is not addressed in the design report.
- Any change that can reasonably be expected to reduce siren sound coverage. Such changes include:
 - Degradation in sirens output below that assumed in the design report due to design due to installation or maintenance practices;
 - Substitution using a siren with a lower sound rating;
 - Substitution using directional siren for an omni-directional siren;
 - Increasing the siren operating frequency;
 - Siren control system design, configuration control or software quality assurance problems identified during system operation and maintenance that can be reasonably expected to cause more than 10% of the sirens not being actuated in an actual emergency unless the ANS system is modified;or
 - Addition of buildings or man-made changes in topographical features that can be reasonably expected to result in "shadowing" of sound from nearby siren(s) not previously accounted for.
- Any other item that brings into question the ability of the ANS system to perform in the way it was described in the Design Report. This can be based on NRC inspection findings or significance determination, emergency exercise results, telephone survey results or the FEMA Regional Assistance Committee (RAC) chair judgment.