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Duane Arnold Energy Center
Operated by Nuclear Management Company, LLC

April 7, 2004

NG-04-0223
10 CFR 50.54(q)

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station 0-P1-17
Washington, DC 20555-0001

DUANE ARNOLD ENERGY CENTER
DOCKET 50-331
LICENSE No. DPR-49
DUANE ARNOLD ENERGY CENTER EMERGENCY PLANNING DEPARTMENT
PROCEDURE TRANSMITTAL ACKNOWLEDGEMENT MEMO (TAM-125)

Enclosed is the Duane Arnold Energy Center Emergency Planning Department Procedure Transmittal Acknowledgement Memo (TAM-125) which contains revisions to various Emergency Planning Implementation Procedures and forms. These revisions have been reviewed pursuant to 10 CFR 50.54(q), as required, and it has been determined they do not decrease the effectiveness of the approved emergency plan.

This letter makes no new commitments or changes to any existing commitments.

Sincerely,

Mark A. Peifer
Site Vice President, Duane Arnold Energy Center

Enclosure: DAEC EMERGENCY PLANNING DEPARTMENT PROCEDURE TRANSMITTAL ACKNOWLEDGEMENT MEMO (TAM-125)

CC Regional Administrator, USNRC, Region III (2 copies)
Project Manager
NRC Resident Inspector

A045

3277 DAEC Road • Palo, Iowa 52324-9785
Telephone: 319.851.7611

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DAEC EMERGENCY PLANNING DEPARTMENT PROCEDURE TRANSMITTAL ACKNOWLEDGEMENT MEMO (TAM-125)

To: NRC-NRR Document Control Desk
US NRC
Washington DC 20555

Re: Entire EPIP Document (Copy: 28)

PSM Title: n/a

Distribution Date: 03 / 25 / 2004
Effective Date of Change: 04 / 05 / 2004
Return by: 04 / 15 / 2004

Please perform the following to your assigned manual. If you have any questions regarding this TAM please contact Don A. Johnson at 319-851-7872.

	REMOVE	INSERT
EPIP Table of Contents Revision	Rev. 150	Rev. 151
EPIP 1.1 (PWR: 24450)	Rev. 22	Rev. 23
EPIP 1.2 (PWR: 23591)	Rev. 29	Rev. 30
EPIP 1.3 (PWR: 24432)	Rev. 9	Rev. 10
EPIP 2.8 (PWR: 24056)	Rev. 2	Rev. 3
EPIP CR-04 (PWR: 24444)	Rev. 2	Rev. 3

PERFORMED BY:

Print Name _____ Sign Name _____ Date _____

Please return to: K. Dunlap
PSC/Emergency Planning
3313 DAEC Rd.
Palo, IA 52324

To be completed by DAEC EP personnel only:
Date TAM returned: _____
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	REMOVE	INSERT
EPIP EOF-38 (PWR: 22900)	Rev. 1	Rev. 2
EPIP NOTE-01 (PWR: 23592)	Rev. 5	Rev. 6
EPIP NOTE-02 (PWR: 23593)	Rev. 3	Rev. 4
EPIP NOTE-04 (PWR:)	Rev. 1	Rev. 2
Remove existing copies from manual, Rev. 2 and replace with new copies of Rev. 2. Ensure that any 'working' copies, with holes through the printing, are also removed.		
EPIP NOTE-05 (PWR:)	Rev. 7	Rev. 7
Remove existing copies from manual, Rev. 7 and replace with new copies of Rev. 7. Ensure that any 'working' copies, with holes through the printing, are also removed.		

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	REMOVE	INSERT
EPIP NOTE-07 (PWR: 23594)	Rev. 2	Rev. 3
EPIP PASE-02 (PWR: 24584) Delete this form.	Rev. 1	Rev. 2

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Palo, IA 52324

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Date TAM returned: _____
EPTools updated: _____

Thursday, April 1, 2004

NRC-NRR Document Control Desk
US NRC
Washington, DC 20555

To: NRC-NRR Document Control Desk
From: DAEC Emergency Planning Department

Re: (TAM-125) Description of changes to the following documents

EPIP 1.1 Determination of Emergency Action Level
Provide direction for ERO Decision Makers concerning Classification Downgrades and add information about State and County actions for Site Area Emergency level. Reword references to 'reclassification' to say 'Classification Upgrade'. Create 'Classification Upgrade' Section 3.3. Create new Section 3.4, 'Classification Downgrade'. Renumber remaining sections as necessary.

EPIP 1.2 Notification
Changes are to reflect the new Dialogic Callout System. Change all references to NOTE - 02, 'ERO NOTIFICATION - ALPHANUMERIC PAGING SYSTEM CALLOUT' to NOTE-01, 'ERO NOTIFICATION - DAEC CALLOUT SYSTEM'. Change all references to 'NOTE-01, 'ERO NOTIFICATION - PHONE SYSTEM CALLOUT' to 'NOTE-02, 'ERO NOTIFICATION - AlphaNumeric Paging System'.

EPIP 1.3 Plant Assembly and Site Evacuation
ECP 1676 for Security Hand Geometry access control. Updating of accountability area locations, instructions, and site access control to reflect current practices and current titles. Personnel being evacuated shall retain their TLD, which will be turned in at the ORAA. Updating accountability areas for Badging Center, Training Center, and Plant Support Center.

EPIP 2.8 Security Threat
This revision incorporates changes due to the implementation of a new Callout System. Section 3.2.1 / 3.2.2 now reference EPIP 1.2, NOTIFICIATIONS to direct notification of the EOF, JPIC and the State and Counties. Section 3.3 has a step added to 'Activate remaining ERO if appropriate' when the security threat is resolved. Attachments 2 and 3 have been deleted since these actions are now addressed in EPIP 1.2.

EPIP CR-04 CR to TSC Command and Control Checklist
1. ANI has moved to a new location. Revise American Nuclear Insurers (ANI) address and phone number.
2. To clarify the amount of time allotted to make these notification calls, add 'within 90 minutes of the event' to notifications of INPO, ANI and NEI.

EPIP EOF-38 EOF Messenger Checklist
Remove reference to the Rad Data Comm. The Rad Data Comm. position is obsolete and was removed via PWR 22895.

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EPIP NOTE-01 ERO Notification - Offhours Phone Systems Callout
Complete rewrite to make NOTE-01 the ERO NOTIFICATION - DAEC CALLOUT SYSTEM procedure. This change will support the transition to the Dialogic Callout System for ERO notification.

EPIP NOTE-02 ERO Notification - Alphanumeric Paging System Callout
Complete rewrite to make NOTE -02 the ERO NOTIFICATION - ALPHANUMERIC PAGING SYSTEM CALLOUT procedure. This change will support the transition to the Dialogic Callout System for ERO notification.

EPIP NOTE-04 Plant Assembly Notification
No PWR attached. This is an administrative format change only. Left hand margin has been increased to allow for 3-hole punch without losing information.

EPIP NOTE-05 State & County Notification Form
No PWR attached. This is an administrative format change only. Left hand margin has been increased to allow for 3-hole punch without losing information.

EPIP NOTE-07 Basic Notification Flowpath
These changes will reflect the changes due to the adaptation of the ERO Notification system to using the Dialogic Callout System. This system does both, the Pager callout and the phone callout. Change references to NOTE 1 and 2 and changes the title for NOTE - 01. Also, the flow path will be changed.

EPIP PASE-02 Onsite Assembly Locations
Eliminate this EPIP form. All of this form's information is contained in EPIP 1.3, PLANT ASSEMBLY AND SITE EVACUATION.

Please contact Paul Sullivan, Manager of Emergency Preparedness at DAEC, (319)851-7191, if you require further information.

Sincerely,

Paul Sullivan Date: 4/1/04
Manager, DAEC-EP

3313 DAEC Road - Palo, Iowa 52324-9785
Telephone: 319.851.7191 - Fax: 319.851.7364

EMERGENCY PLAN IMPLEMENTING PROCEDURES	Rev. 151
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CR-03	Dose Projection & ARM Data Sheet	Rev. 0	EPIP 2.5
CR-04	Control Room to TSC Transfer Checklist	Rev. 3	EPIP 2.5
EAL-01	Abnormal Rad Levels/Radioactive Effluent Table	Rev. 6	EPIP 1.1
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TSC-40	ARM Locations	Rev. 0	EPIP 3.1/4.3
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TSC-42	On-Site Map	Rev. 0	EPIP 3.2
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EMERGENCY PLAN IMPLEMENTING PROCEDURE	EPIP 1.1
DETERMINATION OF EMERGENCY ACTION LEVELS	Rev. 23 Page 1 of 11

Usage Level
REFERENCE

Effective Date: 4-5-04

TECHNICAL REVIEW

Prepared and Verified by: Thomas A. Zimmerman Date: 2/25/04

Validated by: [signature] Date: 2/25/04
Emergency Planning Staff

PROCEDURE APPROVAL

I am responsible for the technical content of this procedure.

Approved by: [signature] Date: 2/26/04
Manager, Emergency Planning

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1.0 PURPOSE

(1) Provides guidance to the Operations Shift Manager (OSM), Emergency Coordinator (EC), or Emergency Response and Recovery Director (ER&RD), as applicable, when determining a need to declare or retract an emergency event at DAEC.

2.0 DEFINITIONS

(1) Emergency Action Level (EAL)

(a) A pre-determined, site-specific, observable threshold for a plant Initiating Condition that places the plant in a given Emergency Classification Level. An EAL can be: an instrument reading, an equipment status indicator, a measurable parameter (on-site or off-site), a discrete observable event, results of analyses, entry into specific emergency operating procedures, or another phenomenon which, if it occurs, indicates entry into a particular Emergency Classification Level.

(2) EAL Technical Basis Document

(a) This document was developed to :

(i) Provide clear documentation of how NEI generic guidance was applied in the development of DAEC upgraded EALs.

(ii) Provide justification of any exceptions or additions to NEI generic guidance as it is applied to DAEC.

(iii) Facilitate the regulatory approval of the upgraded EALs that is required under 10CFR50 Appendix E.

(3) Emergency Classification Level

(a) These are taken from 10CFR50 Appendix E. They are, in escalating order :

(i) (Notification of) Unusual Event (UE): Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant/ISFSI. No releases of radioactive material requiring off-site response or monitoring are expected unless further degradation of safety systems occurs.

(ii) Alert: Events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant/ISFSI. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.

(iii) Site Area Emergency (SAE): Events are in progress or have occurred which involve an actual or likely major failure of plant functions needed for the protection of the public. Any release is not expected to exceed EPA Protective Action Guideline exposure levels except near the site boundary.

(iv) General Emergency (GE): Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting, with potential for loss of containment integrity. Releases can be reasonably expected to exceed EPA Protective Guideline exposure levels offsite for more that the immediate site area.

(4) ISFSI

(a) Independent Spent Fuel Storage Installation facility and associated cask loading and storage activities.

(5) Retraction

(a) The recanting of an Emergency Action Level that was declared due to an indeterminate condition.

3.0 INSTRUCTIONS

3.1 OVERVIEW

(1) The Control Room, TSC, and EOF staff shall evaluate plant/ISFSI conditions to determine whether any EAL Threshold Values have been met. The OSM/EC/ER&RD should declare the appropriate EAL within 15 minutes once indications are available that the Threshold Value for an EAL has been exceeded.

NOTE

For the purpose of making EAL determinations it is acceptable to use SPDS or ERDS information. It is always prudent to verify the SPDS or ERDS information with redundant instrumentation, when it is available.

(2) The OSM/EC/ER&RD shall ensure requisite notifications are made within the 15-minute requirement, per EPIP 1.2 'Notification'.

(3) Plant assembly and site evacuation decisions shall be made in accordance with EPIP 1.3, 'Plant Assembly and Site Evacuation'.

(4) The EC/OSM/ER&RD shall review and approve the emergency classification to determine if events/conditions have changed that may warrant upgrade, declassification, termination or retraction.

(5) The EC/OSM/ER&RD shall ensure activation of the Emergency Response Organization is underway/completed, as required.

(6) If an EAL has been declared due to an indeterminate condition and subsequent investigation/evaluation discovers the condition did not exist, the event may be retracted. Notifications shall be made per EPIP 1.2 'Notification'.

(7) The plant operating mode that existed at the time that the event occurred, prior to any protective system or operator action initiated in response to the condition, is compared to the mode applicability of the EALs. If an event occurs, and a lower or higher plant operating mode is reached before the emergency classification can be made, the declaration shall be based on the mode that existed at the time the event occurred.

3.2 EVENT CLASSIFICATION

(1) Emergency conditions are classified in an ascending order of severity as follows:

(a) NOTIFICATION OF UNUSUAL EVENT (Recognition Category AU, FU, HU, SU, EU)

(b) ALERT (Recognition Category AA, FA, HA, SA)

(c) SITE AREA EMERGENCY (Recognition Category AS, FS, HS, SS)

(d) GENERAL EMERGENCY (Recognition Category AG, FG, HG, SG)

(2) When a suspected emergency condition occurs, the EC/OSM/ER&RD and their associated staff, shall make the initial analysis and determination of the classification, referring to the appropriate EAL tables in Appendix 1 and the EAL Basis Document. The appropriate EAL should be declared within 15 minutes once indications are available that the Threshold Value for an EAL has been exceeded. Appendix 1 of the EPIP's contains the five tables, EAL-01 through EAL-05, covering Emergency Action Levels.

(3) To determine an EAL: Categorize the general type of event, referring to the EAL tables.

(4) If the OSM has been fulfilling the responsibilities of the EC, upon declaring the emergency classification, the event, the time declared and the action(s) taken shall be logged in the Shift Manager's Log.

(5) Other events not specifically included in this procedure which may be based on plant/ISFSI prognosis, weather, or other external events, as well as events that have a high likelihood of occurrence may be classified as a NOTIFICATION OF UNUSUAL EVENT, ALERT, SITE AREA EMERGENCY or GENERAL EMERGENCY at the discretion of the EC/OSM/ER&RD. The primary consideration for classification of these events shall be to protect the health and safety of site personnel and the public.

(6) The highest emergency classification for which an Emergency Action Level (EAL) is CURRENTLY met should be declared.

(a) If an action level for a higher classification was exceeded, but the situation has been resolved prior to offsite reporting, the higher classification level should be REPORTED to the offsite agencies and the NRC, but SHOULD NOT be declared.

(b) The notification must indicate the CURRENT classification, the period of time that the higher classification existed and the mitigating conditions that caused the reduction in the emergency classification.

3.3 CLASSIFICATION UPGRADE

(1) As plant/ISFSI conditions change, the EC/OSM/ER&RD shall ensure that plant/ISFSI status is monitored and the EAL Tables and EAL Basis Document are constantly consulted in order to adjust the emergency classification, as appropriate. The appropriate EAL should be declared within 15 minutes once indications are available that the Threshold Value for an EAL has been exceeded.

(2) A Classification Upgrade should be based upon the guidance provided in the EAL Tables and DAEC Emergency Plan.

(3) A Classification Upgrade shall be reviewed and approved by the EC/OSM/ER&RD.

(4) The EC/OSM should consult with the following personnel, if available, during such evaluations:

(a) Site Radiation Protection Coordinator (SRPC)

(b) TSC Operations Supervisor

(c) Tech and Engineering Supervisor

(d) Emergency Response and Recovery Director

(5) The ER&RD should consult with the following personnel:

(a) Emergency Coordinator

(b) EOF OPS Liaison

(c) RAD & EOF Manager

(6) The EC/OSM shall ensure that offsite agencies are notified of the Classification Upgrade in accordance with EPIP 1.2, 'Notification'. If the Emergency Operations Facility (EOF) has been declared operational, the ER&RD shall assume this responsibility, unless otherwise advised.

(7) If the OSM is fulfilling the responsibilities of the EC, a Classification Upgrade of an event shall be documented in the Operations Shift Manager's Log or the TSC Supervisor's Log as appropriate.

3.4 CLASSIFICATION DOWNGRADE

NOTE

Should the situation change and a **reduction** in emergency classification is appropriate, it is prudent to make a timely notification to the offsite agencies to minimize the impact of implementing the actions required for the higher classification.

(1) A Classification Downgrade shall be reviewed and approved by the EC/OSM/ER&RD.

(a) When the reason for the highest level Classification is cleared, many other conditions may still exist. A Classification Downgrade should be based upon the guidance provided in the EAL Tables and the DAEC Emergency Plan. For the purposes of determining the appropriate Classification Downgrade to declare, no time limit is imposed.

NOTE

If DAEC no longer meets the criteria for a Site Area Emergency and can downgrade the EAL, it is prudent to do so to minimize the impact on the general public. At a Site Area Emergency, the State and Counties usually relocate school populations to Temporary Relocation Centers.

(b) The EC/OSM should consult with the following personnel, if available, during such evaluations:

(i) Site Radiation Protection Coordinator (SRPC)

(ii) TSC Operations Supervisor

(iii) Tech and Engineering Supervisor

(iv) Emergency Response and Recovery Director

(c) The ER&RD should consult with the following personnel:

(i) Emergency Coordinator

(ii) EOF OPS Liaison

(iii) RAD & EOF Manager

(2) Once the downgraded classification is declared, the EC/OSM/ER&RD shall ensure that offsite agencies are notified in accordance with EPIP 1.2, 'Notification'.

(i) For example: A Site Area Emergency is declared due to condition SS2, Failure of RPS to Complete or Initiate an Automatic Reactor Scram. After initiating ARI, most of the control rods are fully inserted and reactor power has lowered below the APRM downscale alarms. The EC/OSM may take whatever time is necessary to assess the situation and declare a downgrade to the Classification, SA2, Failure of RPS to Complete or Initiate an Automatic Reactor Scram – Manual Scram was Successful. Once the downgraded Classification is declared, a 15-minute notification clock is initiated.

(b) If the OSM is fulfilling the responsibilities of the EC, a Classification Downgrade of an event shall be documented in the Operations Shift Manager's Log or the TSC Supervisor's Log as appropriate.

3.5 CRITERIA FOR EMERGENCY CLASSIFICATION CHANGES

(1) As plant/ISFSI conditions change, consider:

(a) The probability that plant/ISFSI conditions will continue to improve.

(b) The probability that plant/ISFSI conditions might worsen, thereby necessitating upgrading the emergency classification once the emergency has been downgraded.

(c) The need to staff all or some of the emergency response facilities.

(d) Evaluating existing conditions with respect to the criteria established for each emergency classification per the EAL Tables.

(e) The control or termination of non-routine releases of radioactive material to the environment.

(f) The control or cessation of any fire, flood, earthquake, or similar emergency conditions.

(g) The specified corrective action has been taken, or the plant has been placed in the appropriate operating mode.

(h) All required notifications are completed.

(i) The TSC technical staff has evaluated the plant/ISFSI status with respect to the Technical Specifications/applicable 10CFR 72 Certificate of Compliance requirements and recommends downgrading the emergency classification.

(2) An emergency condition can be considered resolved, and a Recovery Organization established, if necessary, when the following guidelines have been met or addressed:

(a) Existing conditions no longer meet the emergency classification criteria and it appears unlikely that conditions will deteriorate further.

(b) No surveillance relative to offsite protective actions is needed, except for the control of foodstuffs, water, and offsite contamination, or environmental assessment activities.

(c) Radiation levels in affected in-plant/ISFSI areas are stable or decreasing to acceptable levels.

(d) Releases of radioactive material to the environment are under control or have ceased.

(e) No Emergency Operating Procedure (EOP) entry condition exists.

(f) The reactor is in a stable and safe shutdown condition, and long-term core cooling is available as required.

(g) The control or cessation of any fire, flood, earthquake, or similar emergency conditions.

(h) All EAL notifications have been completed.

(i) Offsite conditions will not limit access of personnel and support resources.

(j) Discussions have been held with the Nuclear Regulatory Commission (NRC), State and local organizations with FEMA input as necessary, and agreement has been reached to terminate the emergency.

(k) The TSC technical staff has evaluated the plant/ISFSI status with respect to the Technical Specifications/applicable 10CFR 72 Certificate of Compliance requirements and concurs with the termination of the emergency.

4.0 RECORDS

All logs, forms, and records generated must be forwarded to the EP Department and retained in accordance with QA Record Retention requirements. Authorization for disposal shall be obtained from the NRC.

5.0 REFERENCES

(1) DAEC Emergency Plan

(2) DAEC EAL Technical Basis Document

(3) DAEC Technical Specifications

(4) Emergency Operating Procedures (EOPs)

(5) Updated Final Safety Analysis Report

(6) EPIP 1.2, 'Notifications'

(7) 10CFR50 Appendix E

(8) 10CFR 72.32(c) and (d)

(9) NEI Methodology for Development of Emergency Action Levels NUMARC/NESP-007 NEI 99-01 Revision 4, May 1999/September 2002

(10) NEI Methodology for Development of Emergency Action Levels NUMARC/NESP-007 NEI 97-03 August 1997

6.0 EPIP FORMS

TABLE	FORM No.
Abnormal Rad Levels/Radioactive Effluent	EAL-01
Fission Barrier Table	EAL-02
Hazards and Other Conditions Affecting Plant Safety	EAL-03
System Malfunction	EAL-04
Independent Spent Fuel Storage Installation (ISFSI)	EAL-05

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NOTIFICATIONS	Rev. 30 Page 1 of 13

Usage Level
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Manager, Emergency Planning

Concurred by: _____ Date: 3/15/04
Operations Management

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1.0 PURPOSE

(1) This procedure provides instructions for initial and follow-up notifications of the Emergency Response Organization (ERO), Benton and Linn Counties, the Iowa Emergency Management Division, and the NRC in response to an emergency classification declared at the DAEC.

2.0 DEFINITIONS

(1) **Emergency Classification**

(A) Four classes of Emergency Action Levels designed to provide early and prompt notification of events which could lead to more serious consequences given operator error or equipment failure or which might be indicative of more serious conditions which are not yet fully realized.

(i) The four classes are; Notification of Unusual Event, Alert, Site Area Emergency and General Emergency.

3.0 INSTRUCTIONS

3.1 OVERVIEW

(1) The Operations Shift Manager/Control Room Supervisor (OSM/CRS), Emergency Coordinator (EC), and Emergency Response & Recovery Director (ER&RD) shall ensure that initial and follow-up notifications are made to the ERO, counties, State, and NRC in accordance with this procedure.

(2) The Emergency Telephone Book (ETB) contains telephone numbers to support required notifications.

(3) The DAEC ERO should be notified to respond within approximately 5-minutes of event declaration to ensure timely response of the 30-min Responders.

(4) Assembly & Accountability shall be completed within 30-minutes of event declaration in accordance with EPIP 1.3 'Plant Assembly and Site Evacuation'.

(5) Benton and Linn Counties, and the Iowa Emergency Management Division, shall be notified within 15 minutes after the declaration of an emergency classification, as required by 10CFR50 Appendix E (Reference 1).

(6) The NRC Emergency Operations Center (EOC) shall be notified as soon as possible after notifying Benton and Linn Counties and the Iowa Emergency Management Division, and not later than one hour after the declaration of an emergency classification as required by 10CFR50.72 (Reference 2).

(7) Continuous communications with the NRC shall be established for all events classified as an ALERT or greater when requested by the NRC. This will be supported by the TSC ENS Communicator.

(8) Completion of all notifications will be documented on the notification forms.

(A) Completed forms will be forwarded to the OSM/EC/ER&RD as appropriate for review. The Manager, Emergency Planning, shall receive a copy of the notification forms. {IC001}

3.2 INITIALLY NOTIFYING THE ERO, BENTON/LINN/STATE EOC'S, AND NRC

NOTE

Reference EPIP Form NOTE-07 for notification flowpath.

NOTE

IF POSSIBLE, CONTACT SECURITY PRIOR TO EVENT DECLARATION OR IMMEDIATELY AFTER EVENT DECLARATION. THE SECURITY LT. SHOULD BE DISPATCHED TO THE CONTROL ROOM ASAP.

(1) **ERO NOTIFICATIONS**

[NOTE: ERO Notifications should occur within approximately 5 minutes of event declaration.]

(A) **STA**

(i) Contact the Security Lt to respond to the Control Room.

(ii) Complete NOTE-01 'ERO Notification – DAEC Callout System.'

(B) **OSM/CRS**

(i) Approve NOTE-01 if applicable.

(C) **STA**

(i) Activates the ERO per NOTE-01.

(2) **STATE & COUNTY NOTIFICATIONS**
[The STA performs this function during a security related emergency or if the Security Lt. is unable to get to the Control Room in time for this notification to be made within 15 minutes of the declaration.]

(A) **STA**

(i) Complete NOTE-05, 'Emergency Action Level Notification Form'.

(B) **OSM/CRS**

(i) Direct the STA, or Security Lt. as applicable, to make initial and follow-up notifications to Benton County, Linn County, and the Iowa Emergency Management Division per section 3.3.

(3) **ASSEMBLY & ACCOUNTABILITY**
[Assembly & Accountability must be completed within 30 minutes of EAL declaration.]

(A) **STA**

(i) Complete form NOTE-04, 'Plant Assembly Notification Form', and submit it to the OSM/CRS for review and approval.

(B) **OSM/CRS**

(i) Direct a member of the Control Room crew, or STA, to perform the Plant Page announcement per NOTE-04. Ensure to turn on the outside speakers.

(4) **NRC NOTIFICATIONS**
[NRC notifications must be completed ASAP but within 60 minutes of EAL declaration.]

(A) **STA**

(i) Complete form NOTE-03, 'Reactor Plant Event Notification Worksheet'.

(ii) Direct the TSC ENS Communicator, (the backups for this function are the STA and Security Lt.), to make the initial and follow-up notifications to the NRC Emergency Operations Center per section 3.4.

(5) **CORPORATE MANAGEMENT NOTIFICATIONS**

(A) **OSM/EC/ER&RD**

(i) Inform Corporate Management of the situation.

(ii) Inform INPO, ANI, and Nuclear Electric Insurance Limited in accordance with form CR-04, 'Control Room to TSC Command & Control Transfer Checklist'.

(B) **Support Services Coordinator**

(i) For an ALERT or greater, contact the Corporate Security Manager and instruct him/her to direct the Tower 1st Floor Security guard to make the appropriate (drill or emergency) announcement on the building page system.

(6) **ERO MEMBERS**

(A) When notified of an ALERT or greater, report to assigned facility, as directed, and complete any assigned notifications in accordance with the ETB as applicable.

3.3 PROCEDURE FOR NOTIFYING THE STATE & COUNTIES

(1) Using the dedicated microwave line, select line 2 and dial "9999" (All-Call) to contact Benton and Linn Counties, and the Iowa Emergency Management Division. Upon verification that all three parties are on the line, dial "####" to cease further ringing on the line. Provide the information as read from Form NOTE-05, 'EMERGENCY ACTION LEVEL NOTIFICATION FORM'.

NOTE

If the microwave line is unable to contact either Benton County, Linn County, or State EMD then use the commercial telephone to contact them. A list of the numbers is available in the ETB and a copy is near the phone. The 15-minute requirement begins when the event is declared and ends when the FIRST EOC Representative answers the phone. Priority shall be: (1) notify all respondents via microwave line; (2) place a commercial telephone call to those respondents who, because of equipment/line difficulties, cannot answer the microwave line; (3) fax page 1 of NOTE-05 to ensure notifications are properly completed and understood.

(2) Fax page 1 of 2 of the completed Form NOTE-05, 'EMERGENCY ACTION LEVEL NOTIFICATION FORM', to Benton County, Linn County, and the Iowa Emergency Management Division to confirm the notification. Push button "01" for working hour distribution and button "02" for off hour and weekend distribution.

(A) If the fax is not operable, confirmation will be made via microwave, commercial phone, or point-to-point radio.

(B) Initiate any follow-up notifications to the counties and State for changes to PARs and EALs.

3.4 PROCEDURE FOR NOTIFYING THE NRC

(1) Notify the NRC Emergency Operations Center on the FTS-2001 Network ENS line using Form NOTE-03, 'Event Notification Worksheet' as a guide if desired.

3.5 FOLLOW UP NOTIFICATION FROM THE TSC (OR CONTROL ROOM IF TSC NOT ACTIVATED)

(1) **EC (OSM/CRS)**

(A) Provide follow up notifications for changes to PARs and EALs to the ERO, Benton and Linn County Emergency Management, the Iowa Emergency Management Division and the NRC until the ER&RD assumes this responsibility in the EOF.

(B) Periodic status updates shall be provided to the State and counties by the Admin Supervisor until the EOF has assumed follow-up notifications.

(2) **TSC Operations Liaison (STA)**

(A) For changes to the declared emergency classification, PARs, and/or cancellation of the emergency, complete Form NOTE-05, 'EMERGENCY ACTION LEVEL NOTIFICATION FORM', and submit it to the EC for approval.

1. Ensure to obtain SRPC concurrence on PARs.

(3) **EC (OSM/CRS)**

(A) Review and approve Form NOTE-05, 'EMERGENCY ACTION LEVEL NOTIFICATION FORM'.

(B) Direct the Admin Supervisor to notify Benton County, Linn County, and the Iowa Emergency Management Division per section 3.3 step (1).

(C) Direct the Admin Supervisor to send the backup fax to Benton County, Linn County, and the Iowa Emergency Management Division per section 3.3 step (2).

(4) **TSC Operations Liaison (STA)**

(A) Complete the following forms and submit them to the EC for review and approval:

1. Form NOTE-02, 'ERO NOTIFICATION - ALPHANUMERIC PAGING SYSTEM CALLOUT.'

2. Form NOTE-03, 'EVENT NOTIFICATION WORKSHEET.'

3. Form NOTE-06, 'PLANT PAGE FOR EMERGENCY CLASSIFICATION CHANGES'.

(5) **EC (STA)**

(A) Direct the Security and Support Supervisor to conduct pager notifications per Form NOTE-02, 'ERO NOTIFICATION - ALPHANUMERIC PAGING SYSTEM CALLOUT'.

(B) Direct the TSC Operations Liaison to perform the plant page announcement per Form NOTE-06, 'PLANT PAGE FOR EMERGENCY CLASSIFICATION CHANGES'.

(C) As soon as possible, but within 1 hour after the change, direct the TSC ENS Communicator to notify the NRC Emergency Operations Center per section 3.4

3.6 FOLLOW UP NOTIFICATION FROM THE EOF

(1) **ER&RD**

(A) Upon activating the EOF, assume responsibility from the EC for directing follow up notifications for changes to PARs and EALs to the ERO, counties, State, and the NRC until no longer necessary.

(2) **EOF Ops Liaison**

(A) For changes to the declared emergency classification, PARs and/or cancellation of the emergency, complete the Form NOTE-05, 'EMERGENCY ACTION LEVEL NOTIFICATION FORM', and submit it to the ER&RD for review and approval.

(i) Ensure to obtain Rad & EOF Manager input for PARs.

(B) Periodic updates shall be provided to the State and counties by the Rad & EOF Manager.

(3) **EOF Ops Liaison**

(A) Complete Form NOTE-02, 'ERO NOTIFICATION - ALPHANUMERIC PAGING SYSTEM CALLOUT', and submit it to the ER&RD for approval.

(4) **Rad & EOF Manager**

(A) Using the Admin Hotline to contact Benton and Linn Counties, and the Iowa Emergency Management Division, provide the information as read from Form NOTE-05, 'EMERGENCY ACTION LEVEL NOTIFICATION FORM'

(5) **Support Services Coordinator & EOF Messenger**

(A) Conduct the pager notifications per the completed Form NOTE-02, 'ERO NOTIFICATION - ALPHANUMERIC PAGING SYSTEM CALLOUT' and fax page 1 of the completed Form NOTE-05, 'EMERGENCY ACTION LEVEL NOTIFICATION FORM', to Benton and Linn Counties and the Iowa Emergency Management Division to confirm the notification.

1. If the fax is not operable, confirmation will be made via microwave, commercial phone, or point-to-point radio.

(6) **HPN Communicator**

(A) Using Form NOTE-03, 'EVENT NOTIFICATION WORKSHEET' as a guide if desired, notify the NRC Operations Center on the FTS-2001 Network ENS and HPN line in the EOF. The TSC-ENS Communicator will maintain continuous communication on the ENS line with the NRC providing the needed plant technical information as requested by the NRC Emergency Operations Center.

4.0 RECORDS

(1) All logs, forms, and records generated must be maintained in accordance with EPDM 1007.

5.0 REFERENCES

(1) 10CFR50 Appendix E IV. D

(2) 10CFR50.72, "Immediate Notification Requirements"

(3) {IC001}, Inspection Report 88-04

(4) DAEC Emergency Plan

(5) Emergency Telephone Book (ETB)

(6) EPDM 1007

6.0 ATTACHMENTS

(1) Attachment 1, Notification Forms

ATTACHMENT 1

NOTIFICATION FORMS

Notification Form	Form No.
ERO Notification - DAEC Callout System	NOTE-01
ERO Notification - Alphanumeric Paging System Callout	NOTE-02
Event Notification Worksheet	NOTE-03
Plant Assembly Notification	NOTE-04
Emergency Action Level Notification	NOTE-05
Plant Page for Emergency Classification Changes	NOTE-06
Basic Notification Flowpath	NOTE-07

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PLANT ASSEMBLY AND SITE EVACUATION	Rev. 10 Page 1 of 12

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Prepared by: Thomas R. Zimmerman Date: 3/15/04

Reviewed by: [signature] Date: 3/15/04
Independent Reviewer

PROCEDURE APPROVAL

I am responsible for the technical content of this procedure.

Approved by: [signature] Date: 3/15/04
Manager, Emergency Planning

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1.0 PURPOSE

(1) This procedure provides instructions for plant and site evacuations, the determination and maintenance of accountability of site personnel, control of access to the DAEC site, and habitability and monitoring in assembly areas.

(2) This procedure supports the implementation of requirements in NUREG-0654 and the DAEC Emergency Plan.

2.0 DEFINITIONS

Plant Assembly: An evacuation of personnel from selected buildings or facilities at the DAEC, where the evacuated personnel are reassembled at locations on the site.

Site Evacuation: An evacuation of some or all personnel from the DAEC site to an offsite location.

3.0 INSTRUCTIONS

3.1 PLANT ASSEMBLY

(1) The OSM/CRS shall direct sounding of the Evacuation Alarm for approximately ten (10) seconds for any event classified as an ALERT or greater. (Ensure to 'turn on' the outside speakers.) The Evacuation Alarm may also be sounded for other events, such as:

(a) NOTIFICATION OF UNUSUAL EVENT which warrants evacuation.

(b) Other occurrences which require the evacuation of any part of the plant.

NOTE
For accountability purposes, if we are in an emergency classification condition, evacuation of any area of the plant requires evacuation of the entire plant.

(2) The nature and location of the problem may preclude egress through specific areas of the Power Block Structure during evacuation. The OSM/CRS shall evaluate this potential. Where a problem exists, add any necessary instructions to the "Plant Assembly Notification Form", Form NOTE-04.

(3) Upon sounding of the Evacuation Alarm, a plant evacuation announcement shall be made on the paging system, using Form NOTE-04, "Plant Assembly Notification Form".

(4) Repeat the Evacuation Alarm and paging instructions.

(5) All members of the Emergency Response Organization shall proceed without delay to their assigned Emergency Response Facility.

(a) Pre-designated personnel shall report to the TSC as specified in Reference 1.

(b) Pre-designated personnel shall report to the OSC as specified in Reference 2.

(c) The on-shift operating crew will report to the Control Room.

(d) Security personnel will begin implementing their assigned duties.

(e) Personnel assigned to the EOF shall leave the DAEC site so they may assume their responsibilities in the EOF.

(6) All personnel on site but not members of the Emergency Response Organization shall proceed without delay to their respective assembly areas.

NOTE

It is each employee's responsibility to heed any instructions given over the paging system regarding unsafe areas or locations, and to act accordingly. In the event the paging system becomes inoperable, a runner system shall be established. This runner (assigned by the Security and Support Supervisor) shall advise plant personnel by megaphone of the "Assembly Call". If the Security vehicle is available and manpower permits, the vehicle's P.A. system shall be utilized to advise personnel in the Owner Controlled area to assemble.

(a) All personnel, that are not a member of the ERO, within the Protected Area shall report to the West Warehouse Emergency Accountability card reader by the West door, swipe in for accountability, and remain at the warehouse until further directed.

(b) Visitors shall be escorted to the Security Control Point and instructed to remain in that area. Upon the visitors exit from the Protected Area, the escorts will then proceed to their assigned areas.

(c) Personnel in the Badging Center and fixed trailers outside the protected area who are not assigned to the ERO shall report to the Badging Center, sign in on the Badging Center emergency accountability log (in the Northeast corridor between the vault and the restrooms) and await further instructions via the plant paging system.

(d) Personnel in the Training Center or the ISFSI area who are not assigned to the ERO shall report to the Training Center, sign in the Training Center Accountability log (at the reception desk) and await further instructions via the plant paging system.

(e) Personnel in the Plant Support Center who are not assigned to the ERO shall remain in the PSC, sign in the emergency accountability log (at the front entryway) and await further instructions via the plant paging system.

(f) Onsite personnel, who are outside the Protected Area and not in the previously mentioned areas or fixed trailers shall report to the Security Control Point. This includes personnel at the Cooling Towers, Switchyard, wells, etc.

(7) Personnel who evacuated the Power Block Structure by way of alarmed doors shall report immediately to the OSC to be monitored, since they will have bypassed the portal monitor at Access Control.

(a) They shall notify the Central Alarm Station the location of the alarmed door by which they evacuated.

(b) They shall then report to their designated assembly area for accountability purposes.

(8) Security Force personnel shall make a tour of the grounds outside of the Protected Area Boundary. Any individuals found will be directed or escorted to the Security Control Point (SCP).

3.2 ACCOUNTABILITY DETERMINATION

(1) Accountability of personnel shall be conducted as follows:

(a) Security will activate the Emergency Accountability card readers when advised an event has been declared.

(b) All personnel except the on-duty Control Room Shift Operating personnel, Control Room personnel, Shift Security Personnel, and personnel assigned ERO positions in the TSC, OSC, JPIC, and EOF shall report to their Assembly Areas and log in using the emergency accountability card reader or emergency accountability log book. Personnel assigned to the TSC or OSC shall report to their respective facility and swipe their badge through the card reader.

(c) If any personnel must leave their assigned facility and report to another, it is necessary to swipe their badge through the emergency accountability card reader when arriving at the other facility.

(2) The results of this accountability check shall be reported to the Security and Support Supervisor who shall inform the Emergency Coordinator. This check shall be accomplished within 30 minutes of the start of the emergency, and Security shall continuously account for all onsite individual thereafter..

(3) In the event that an accountability for all personnel is not initially established:

(a) Contact shall be made with supervisory personnel who are not in the Emergency Response Organization to determine if the individual(s) is are in fact present.

(b) If not present, an effort should be made to determine the individual(s) last known location.

(4) Rescue efforts conducted in accordance with Reference 6, shall be initiated for any individual(s) confirmed to be missing.

3.3 MAINTENANCE OF ACCOUNTABILITY

(1) If the evacuation was conducted due to an Alert or greater emergency action level declaration, personnel must remain in their assigned assembly areas until released by the Emergency Coordinator.

3.4 SITE ACCESS CONTROL

(1) Personnel who desire access to the site will be stopped by the Security Force member prior to being granted such access.

(a) The individual desiring access should have a DAEC Security Badge before access will be granted.

(b) If the individual desiring access is not recognized, the Security Force member shall verify the identity of the individual by requesting some form of picture identification and verifying that unescorted access is authorized before allowing the individual to proceed.

(c) If the individual desiring access is not on the list, access shall be permitted only if authorized by the Security and Support Supervisor.

3.5 HABITABILITY CHECKS AND MONITORING OF PERSONNEL

(1) Verification of assembly area habitability will be accomplished as specified in Reference 3.

3.6 SITE EVACUATION

> **NOTE**
> Non-essential personnel shall be evacuated for a SITE or GENERAL EMERGENCY unless radiological, environmental, or security conditions prohibit evacuation.

(1) Evacuation of the site for nonessential personnel may be required based upon:

(a) Severity of the event

(b) Habitability of assembly areas.

(c) Security concerns in accordance with EPIP 2.8.

(2) In making determinations as to non-essential personnel to be evacuated.

(a) Consideration needs to be given to the type of emergency being experienced. For example, evacuation of personnel through the Security Control Point (SCP) may complicate a security related condition.

(b) Consideration needs to be given to the personnel who should remain based upon the emergency condition and skills which may be required on short notice.

(c) Consideration should be given to maintaining an adequate level of support services personnel; e.g., administrative, procurement, and clerical personnel.

(d) Generally, personnel to be evacuated shall be those in the Training Center, Badging Center, Plant Support Center and Warehouse.

(3) Evacuation of personnel from the site will be authorized by the Emergency Coordinator.

(4) The OSM/CRS shall direct sounding of the Evacuation Alarm for approximately 10 seconds. (Ensure to 'turn on' the outside speakers.) Upon completion of the Evacuation Alarm, a site evacuation announcement shall be made on the plant paging system, using Form NOTE-04, or NOTE-06, as applicable.

(5) If evacuation is required and authorized, it shall be directed by the OSC Supervisor and coordinated with the Security Shift Supervisor.

(a) The Security Shift Supervisor shall advise the local law enforcement official located at the intersection of Palo Marsh Road and DAEC Road of the planned evacuation.

(b) Personnel being evacuated shall retain their TLD which will be turned in at the ORAA.

(6) If a total site evacuation is required including evacuation of the Security Facility due to a radiological or other environmental condition, the following items will be removed from the Security Facility and taken to the ORAA.

(a) All radios and emergency access key rings.

(b) All access lists and accountability lists.

(c) The Palo key ring.

(7) Evacuation from the site shall normally be to the ORAA at the Palo School unless otherwise directed by the Emergency Coordinator.

(a) If the radiological release and meteorological conditions are such that evacuation to the Palo facility is inappropriate, an alternate location shall be selected by the Emergency Coordinator based upon input from the Site Radiation Protection Coordinator. The normal alternate location should be the ORAL/ODEF, unless conditions prohibit its use.

(b) A plant page system announcement shall be made notifying evacuees of the alternate offsite assembly area.

(8) Site evacuation shall be by the routes shown in Form PASE-05, using personal transportation.

(a) The south route from the plant will normally be used for site evacuation unless inclement weather, high traffic density or radiological conditions dictate use of the northern route.

NOTE
Use of the North Access Road will require removal of the barriers.

(b) Security personnel shall provide traffic control Onsite and at the ORAA as specified in Reference 7.

(c) Accountability of personnel during evacuation shall be maintained.

(9) An accountability check for personnel evacuating assembly areas within the protected area should be performed once personnel have arrived at the alternate assembly location. Personnel may then be released, or requested to stay, as necessary.

(10) Security personnel shall proceed to the Badging Center, Training Center and Plant Support Center to ensure that all personnel in those facilities have evacuated.

3.7 EMERGENCY CLASSIFICATION UPGRADES

(1) The OSM/CRS shall direct a plant announcement be made on the plant paging system, using Form NOTE-06, for emergency classification upgrades to a SITE EMERGENCY or a GENERAL EMERGENCY.

4.0 RECORDS

All records generated as a result of this procedure should be forwarded to the Manager, Emergency Planning and maintained in accordance with EPDM 1007.

5.0 REFERENCES

(1) EPIP 2.2, "Activation and Operation of the TSC

(2) EPIP 2.1, "Activation and Operation of the OSC

(3) EPIP 3.1, Onsite Radiological Monitoring

(4) DAEC Emergency Plan

(5) NUREG-0654, Planning Standard J

(6) EPIP 4.3, "Rescue and Emergency Repair Work"

(7) EPIP 2.4, "Activation and Operation of the ORAA"

6.0 ATTACHMENTS

6.1 Attachment 1

ATTACHMENT 1
FORMS

FORM TITLE	FORM NUMBER
Plant Assembly Notification	NOTE-04
Plant Page for Emergency Classification Changes	NOTE-06
Site Evacuation Routes	PASE-05

EMERGENCY PLAN IMPLEMENTING PROCEDURE	EPIP 2.8
SECURITY THREAT	Rev. 3 Page 1 of 9

Usage Level
REFERENCE

Effective Date: N-5-04

TECHNICAL REVIEW

Prepared by: _____ Date: 3/15/04

Reviewed by: _____ Date: 3/15/04
Independent Reviewer

PROCESS REVIEW

Reviewed by: _____ Date: 3/15/04
Operations Manager

Reviewed by: _____ Date: 3.15.04
Security Manager

PROCEDURE APPROVAL

I am responsible for the technical content of this procedure.

Approved by: _____ Date: 3/15/04
Manager, Emergency Planning

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1.0 PURPOSE

(1) This procedure provides instructions for the activation of the Emergency Response Organization in response to Security Events at DAEC.

(2) Based on the national security events of 9/11/2001, a change in the way a nuclear facility prepares for, and responds to, security events is required. The NMC has taken steps to ensure the health and safety of its employees, and the safety of its nuclear facilities.

(3) This procedure is intended to be used in support of DAEC AOP 914 - "SECURITY EVENTS", NMC CD 4.1 – "SECURITY THREATS", NMC SE-0018 - "SECURITY THREAT ASSESSMENT", and NMC SE-0017 - "SECURITY THREAT NOTIFICATION".

2.0 DEFINITIONS

The following definitions supplement those contained in the Quality Assurance Manual, Appendix B, "Glossary of Terms".

(1) ATTACK

(a) Actual physical attack on the site as designated by the site Security Shift Supervisor.

(2) ATTACK ON U.S. SOIL

(a) Security has received credible information that an attack is underway in the U.S. This may involve attacks on other nuclear plants for which a threat of attack on an NMC site has not been confirmed.

(3) THREAT OF ATTACK

(a) Security has determined that a credible threat of attack on the site has been made. Security will assess the threat severity as high or low based on SE-0018, "SECURITY THREAT ASSESSMENT".

(4) SECURITY THREAT

(a) Any notification from any source which is received at DAEC or NMC Corporate which could be considered as a threat to the safety of DAEC **whether considered credible or not.**

(5) **HIGH** THREAT SEVERITY

(a) The threat of physical attack to the plant represents a potential, **substantial** degradation of the level of safety of the plant.

(6) **LOW** THREAT SEVERITY

(a) The threat of physical attack to the plant represents a potential degradation of the level of safety of the plant.

(7) SECURITY DECISION MAKER

(a) The senior NMC security person available to address the threat assessment (via NMC SE-0018). This will normally be the NMC Director of Security designee, and would next fall to the DAEC Security Manager, another site's Security Manager, and finally the Security Shift Supervisor (with the direct guidance of the Shift Manager).

3.0 INSTRUCTIONS

3.1 CREDIBILITY DETERMINATION

(1) Credibility is determined in accordance with NMC SE-0018, "Security Threat Assessment".

(a) **IF** the threat does not involve the potential for the degradation of the safety of the plant, an attempted entry into the protected area or attempted sabotage, **THEN** the threat is to be considered **NON-CREDIBLE.**

(b) **IF** the threat is determined to be **CREDIBLE**, **THEN** the Operations Shift Manager (OSM) will be immediately notified and recommended to classify the event as a NOTIFICATION OF UNUSUAL EVENT.

3.2 SEVERITY DETERMINATION

(1) Following the above determination of Credibility, the Security Decision Maker will also perform an assessment of the threat's severity in accordance with NMC SE-0018.

3.2.1 CREDIBLE THREAT OF HIGH SEVERITY

(1) **IF** the threat assessment determines that it is a **CREDIBLE THREAT of HIGH Severity** as determined by NMC SE-0018, "Security Threat Assessment", **THEN** the OSM will be notified to consider re-classifying the event as an **ALERT** per AOP 914, "Security Emergency" and EPIP 1.1, "Determination of Emergency Action Levels".

(a) If an attack is in progress, or is imminent, make the plant page announcement in accordance with AOP 914, "Security Events".

(b) If time is available for safe plant evacuation, make the plant page announcement in accordance with Attachment 1, "Site Evacuation Announcement for Security Events".

(2) Inform the EOF/JPIC, State and Counties in accordance with EPIP 1.2, "Notifications", "Initially Notifying The ERO, Benton/Linn/State EOC's and NRC."

(3) Notify the Plant Manager, or Emergency Coordinator as applicable, to respond to the Control Room to facilitate communication as the OSM may be involved with placing the plant in a safe condition.

(4) Verify that Local Law Enforcement has been contacted and informed that the EOF and JPIC is being activated to coordinate management communications.

(5) Inform the NRC ENS in accordance with EPIP 1.2, "Notifications".

(6) Work with DAEC and NMC Management to determine what activities are essential and what personnel are needed to support the site.

(a) If additional resources are needed to augment existing Operations staff, then refer to step 3.4, "Staff Augmentation"

3.2.2 CREDIBLE THREAT OF LOW SEVERITY

(1) **IF** the threat assessment determines that it is a **CREDIBLE THREAT of LOW Severity** as determined by NMC SE-0018, "Security Threat Assessment", **THEN** the OSM will be notified. The event should remain as an **UNUSUAL EVENT** per AOP 914, "Security Emergency" and EPIP 1.1, "Determination of Emergency Action Levels".

(a) Make the plant page announcement in accordance with Attachment 1, "Site Evacuation Announcement for Security Events".

(2) Inform the EOF/JPIC, State and Counties in accordance with EPIP 1.2, "Notifications", "Initially Notifying The ERO, Benton/Linn/State EOC's and NRC."

(3) Verify that Local Law Enforcement has been contacted and informed that the EOF and JPIC is being activated to coordinate management communications.

(4) Inform the NRC ENS in accordance with EPIP 1.2, "Notifications".

(5) If the threat escalates, then reclassify and go to Section 3.2.1.

(6) Work with DAEC and NMC Management to determine what activities are essential and what personnel are needed to support the site.

(a) If additional resources are needed to augment existing Operations staff, then refer to step 3.4, "Staff Augmentation"

3.3 FOLLOW-UP ACTIONS

(1) If the security threat is resolved, then enter the appropriate EPIPs to reclassify the event, or terminate the event, as applicable.

(2) Activate remaining ERO if appropriate.

3.4 STAFF AUGMENTATION

(1) The OSM/ER&RD has the authority to augment the response staff as necessary to ensure adequate resources are available to assist Operations in maintaining, or restoring, the safe condition of the plant. A section has been added to the Emergency Telephone Book (ETB) to assist in determining who on-site has previous Operations experience, or other critical experience, which could assist Operations.

(a) This new section of the ETB has been organized based on the following skill sets:

1. Operations
    a. SRO
    b. RO
    c. NSPEO
    d. Severe Accident Management (SAM)
2. Fire Brigade
3. First Aid
4. SCBA

RECORDS

(1) This procedure does not generate any records.

5.0 REFERENCES

(1) NMC CD 4.1, *"Security Threats"*

(2) NMC SE-0018, *"Security Threat Assessment"*

(3) NMC SE-0017, *"Security Threat Notification"*

(4) AOP 914, *"Security Events"*

(5) EPIP 1.1, *"Determination of Emergency Action Levels"*

(6) EPIP 1.2, *"Notifications"*

6.0 ATTACHMENTS

Attachment 1, *"Security Event - Site Evacuation Announcement"*

ATTACHMENT 1

SECURITY EVENT – SITE EVACUATION ANNOUNCMENT

(1) Ensure to turn on the outside speakers

(2) Activate Evacuation Alarm

(3) Make the following page announcement:

"Attention all personnel. Attention all personnel. A security threat exists. Place all essential activities in a safe condition. All EOF personnel assemble at the EOF. All JPIC personnel report to the JPIC. Operations and Fire Brigade personnel assemble in the Control Room. All other personnel evacuate the site."

(4) Repeat steps (2) and (3). (i.e., make announcement twice)

CONTROL ROOM TO TSC COMMAND AND CONTROL TRANSFER CHECKLIST

NOTE

THIS CHECKLIST SHOULD BE USED WHEN TURNING OVER COMMAND AND CONTROL FROM CONTROL ROOM TO THE EC IN TSC.

BRIEF EC/ER&RD regarding:

1. **Current Classification:** **EAL:** _____ **Time:** ___:___
   Conditions used to determine classification: _____
   _____

2. **Fission Product Barriers:**
   Status of Fuel Cladding: _____
   Status of RCS: _____
   Status of containment: _____

3. **On-Site Protective Actions initiated:**
   - ❖ Non-Essential onsite personnel evacuated ☐ YES ☐ NO ☐ N/A
   - ❖ KI issued to onsite personnel ☐ YES ☐ NO ☐ N/A
   - ❖ Accountability complete for onsite personnel ☐ YES ☐ NO ☐ N/A
   - ❖ Event conditions require respirators and PC's ☐ YES ☐ NO ☐ N/A
   - ❖ Authorize exposures beyond 10CFR20 limits? ☐ YES ☐ NO ☐ N/A
   - ❖ Any onsite personnel injured/hospitalized ☐ YES ☐ NO ☐ N/A

   Comments: _____
   _____

4. **Equipment that is Degraded, Out of Service or of Concern:**
   _____
   _____

5. **Support needed by the Control Room to mitigate the event:**
   _____
   _____

6. **Notifications Completed:**

(Within 15-min) State/County Notification (NOTE-5): ☐ YES ☐ NO

(ASAP, but within 60-min) NRC via ENS (NOTE-3): ☐ YES ☐ NO

(Within 60-min) NMC Corporate:
John P. Cowan, VP of Nuclear Operations ☐ YES ☐ NO
(w) 715 – 377-3377 (h) 715 – 386-2592

(Within 90-min of Alert or greater) INPO Emergency Response Center
800 – 321-0614 ☐ YES ☐ NO

(Within 90-min of Alert or greater) American Nuclear Insurers
860 – 682-1301 ☐ YES ☐ NO

(Within 90-min of Alert or greater) Nuclear Electric Insurance Limited
302 – 778-4433 ☐ YES ☐ NO

7. **Non-Delegable Duties to be Assumed by TSC:**

Classify events? ☐ YES ☐ NO

Determine PARs? ☐ YES ☐ NO

Authorize exposures beyond 10CFR20 limits? ☐ YES ☐ NO

8. **Upon transfer of Command & Control, the TSC will be responsible for the following:**

State & County Notifications ☐ YES ☐ NO

ENS Notifications ☐ YES ☐ NO

Onsite Protective Actions ☐ YES ☐ NO

Authorize Use of Thyroid Blocking Agents (KI) ☐ YES ☐ NO

9. **Other Information:**

Release Occuring? ☐ YES ☐ NO

Comments: _____

Any In-Plant Radiological Concerns? ☐ YES ☐ NO

Comments: _____

Location of any In-Plant Operations personnel? _____

10. At time of transfer, document:

Name of OSM/OSS: _____

Name of EC or ER&RD: _____

Date/Time of transfer: _____ / _____

*NOTIFY Control Room personnel of transfer of Command & Control.*_____

OSM/OSS initials

11. After transfer, EC/ER&RD to leave emergency voicemail message:

- From any phone on-site, dial **3791**
- When you hear *"Prompt Maintenance – Voice Service ID?"*, dial **7115#**
- When you hear *"Password?"*, dial **7115#**
- When you hear *"To re-record the prompt press 5"*, dial **5**
- Enter your message after the tone (use the following checklist as a guide). Dial **#** when finished and hang up the phone.
- To hear the message, dial **7115**. If you want to make changes, hang up and begin the process over again.

Checklist of Discussion Points

EVENT

- What EAL was declared?
- When was the EAL declared?
- Generally, what happened to trigger the EAL?
- Where did the event happen?
- What protective actions are in place for the public and the staff?
- What needs to be done to restore normal operation?

SAFETY

- Are the public and the staff safe now?
- Is the plant stable or trending toward public risk?
- Anyone hurt and/or contaminated? (name, title, department)
- If so, treated onsite or sent to decontamination or hospital? (what facility?)

PLANT CONDITION

- Reactor and cooling system running?
- Reactor at full power?

- Full electrical output?

EXTERNAL CONDITIONS THAT MIGHT ATTRACT REPORTERS TO THE PLANT

- Ambulances or medical helicopters seen around the plant?
- Crash involving any kind of vehicle or craft near the plant?
- If so, anybody hurt?
- Are plant personnel or local authorities responding?
- Visible external damage to plant or grid?
- Visible smoke, flames, slick on ground or water, or dark plume from cooling towers?
- Loud explosion, railroad or truck noises, or security force practicing on firing range?

EOF Messenger Checklist

_____ Place nametag / sign-in on staffing board & post the "This is a drill" signs

_____ Post Emergency Action Level signs and inform Security Access Clerk of changes

_____ Ensure adequate supplies are available (paper)

_____ **ERO Notification Form (NOTE-02)** – from ER&RD
Send alpha-mate message
Sign and date form after page has been sent
Return original to EOF Ops Liaison

_____ **EAL Notification Form (NOTE-05)** – from RAD & EOF Manager (distribute as follows)
Iowa EMD and State Dose Assessment (when present)
Original to the EOF Ops Liaison
Fax to: GROUP #20

_____ **Midas Dose Projections** – from printer, goes to RAC and Rad & EOF Manager for disposition and for signature before distribution
State Dose Assessment (when present)
Midas Operator
Original to the RAC

_____ **EAS Messages** – from JPIC distribute as follows
ER&RD
NRC HPN Communicator
Iowa EMD (when present)
Technical Recorder
Rad & EOF Manager

ERO NOTIFICATION – DAEC CALLOUT SYSTEM

(1) **Circle one** Scenario ID from the following list, as applicable:

		SCENARIO ID
REAL EVENTS	ALL ERO FACILITIES ACTIVATE	91
	SECURITY EVENT: EOF/JPIC ACTIVATE	92
ERO DRILLS	ALL ERO FACILITIES ACTIVATE	21
	SECURITY EVENT: EOF/JPIC ACTIVATE	22
OPS TRAINING	ILC / LOR SESSIONS	55

APPROVED BY: _____ DATE: _____ TIME: _____
OSM/CRS // EC // ER&RD

NOTE
For the following three steps (2,3,4) the system will confirm your response.

(2) Dial into the *Dialogic Callout System* at:.....**9-1-866-205-9839**
Backup Dialogic Callout System Number ..9-1-866-611-9213

(3) Enter *Company ID Number:*.....**3827 #**

(4) Enter *Scenario Activation Password:*..... **#**

(5) Enter the *Scenario ID* Number obtained in Step 1:.....**ID Number#**

NOTE
The following message is expected: "To listen to the current scenario message, press 1. To re-record the scenario message, press 2. To start the scenario, press 3. To return to the main menu, press #."

(6) ***"To start the scenario, press 3."*** .....**PRESS 3**

NOTE
The following message is expected: "To start a scenario, press 1. To stop a scenario press 2. To check scenario information, press 3. To enter a different scenario activation password, press 4 To end this call, press #."

(7) ***"To end this call, press #."***.....**PRESS #**

(8) If the ERO Notification pagers are not activated within 2 – 3 minutes, initiate a backup ERO callout by performance of the following procedures:
(a) Perform BACKUP ERO Notification per EPIP form, NOTE-02.
(b) MANUAL ERO CALLOUT PROCESS per the Emergency Telephone Book (ETB).

PERFORMED BY: _____ DATE: _____ TIME: _____

ERO NOTIFICATION - ALPHANUMERIC PAGING SYSTEM CALLOUT

This form to be used when:

- **Dialogics Callout System** is **INOPERABLE**;
  - o OR
- ERO Notifications **AFTER** ERO has already been activated. (i.e., subsequent notifications)

(1) This form shall be approved by the OSM/CRS, EC, or ER&RD, whomever has command & control, for any emergency classification declaration at the DAEC.

(2) Complete (A), (B), (C), and (D) for **initial notifications**. Complete (A), (B), and (C) for **subsequent notifications**.

(A) ☐ Drill ☐ Real

(B) ☐ Unusual Event ☐ Alert

☐ Site Area Emergency ☐ General Emergency

(C)

EAL _____ _____ _____															
Category (circle one)					**Classification** (circle one)				**Sequence #** (circle one)						
A	F	H	S	E	U	A	S	G	1	2	3	4	5	6	7

(D) ☐ Do not report to assigned ERO facility.

☐ Report to assigned ERO facility.

GROUP PAGE APPROVED BY: _____ DATE: _____ TIME: _____
OSM/CRS // EC // ER&RD

GROUP PAGE CONDUCTED BY: _____ DATE: _____ TIME: _____

(3) To initiate the ERO Pager Notification, complete the following instructions for the Alpha-Mate II System.

_____Turn on the Alpha-Mate II (upper right row)

_____Press **PAGE** Key (upper left row)

_____For Alpha-Mate II prompt, 'ENTER NAME OR NUMBER', type **GROUP,** then hit **ENTER.**

_____For Alpha-Mate II prompt, 'ENTER MESSAGE', type **(MESSAGE),** then hit **ENTER.**

As an example, **DRILL, ALERT, AA2, REPORT TO YOUR ASSIGNED ERO FACILITY.**

_____For Alpha-Mate II prompt, 'PAGE IN PROGRESS'- (Observe; OFFHOOK, CONNECTING, CONNECTED, SENDING MESSAGE, DISCONNECTING, PAGE SENT)

(4) (If necessary) Perform the MANUAL ERO CALLOUT PROCESS per the Emergency Telephone Book (ETB).

PLANT ASSEMBLY NOTIFICATION FORM

NOTE
If the North Access road is to be used, the security barriers must be removed. Contact the Maintenance Department to have these barriers removed.

*Perform the following to assemble all personnel on site, or evacuate non-essential personnel, as appropriate. If this is a drill, every announcement shall begin and end with **"This is a drill"**. (Note: Plant assembly must be completed by Security and the names of any missing individuals must be known within 30 minutes of the declaration of the event.)*

(1) Turn on the outside speakers. Depress the 'Evacuation Alarm Push Button' for 5-10 seconds.

(2) Check the appropriate choices and make the applicable announcement over the plant page system:

☐ For an Unusual Event or Alert :

" Attention all personnel, an ☐ Unusual Event ☐ Alert has been declared. Emergency Response Personnel shall report to their designated Emergency Response Facilities. Emergency Personnel assigned to the EOF shall depart the site via the ☐ South ☐ North access and report to the EOF. All other personnel shall report to their designated onsite Assembly locations."

☐ For a Site Area Emergency or General Emergency :

"Attention all personnel, a ☐ Site Area Emergency ☐ General Emergency has been declared. Emergency Response Personnel shall report to their designated Emergency Response Facilities. Emergency Personnel assigned to the EOF shall depart the site via the ☐ South ☐ North access and report to the EOF. All non-essential personnel shall evacuate the site via the ☐ South ☐ North access and proceed to the ☐ Offsite Relocation and Assembly Area at the Palo School ☐ (alternate location)_____."

(3) Add any additional information, or instructions, as necessary:

_____

_____

(4) Repeat steps ***1 -3.***

Completed by: _____ Date: _____ Time: _____

DAEC EMERGENCY ACTION LEVEL NOTIFICATION FORM

INITIAL ROLL CALL	MESSAGE INITIATED	1. STATUS	2. FACILITY IN COMMAND & CONTROL	3. ACCIDENT CLASSIFICATION
☐ Benton County ☐ Linn County ☐ Iowa EMD	Time: _____ Date: _____	[A] ACTUAL [B] DRILL (or from SIMULATOR)	[A] Control Room.....2222 [B] TSC.....3333 [C] EOF.....4444 [D] Simulator.....1111	[A] UNUSUAL EVENT [B] ALERT [C] SITE AREA EMERGENCY [D] GENERAL EMERGENCY [E] RECOVERY [F] CANCELLATION/TERMINATION

(If this notification is for a PAR change ONLY, write "N/A" for information in Block 4.)

4. EAL CLASSIFIED @ TIME: _____ DATE: _____

(For "EAL CLASSIFIED", fill in blank below AND circle appropriate letter or number applicable under Category, Classification and Sequence. For EALs with multiple initiating conditions, specify in Block 12 which initiating condition is applicable.)

EAL _____ _____ _____

Category (circle one)					Classification (circle one)				Sequence # (circle one)						
A	F	H	S	E	U	A	S	G	1	2	3	4	5	6	7

5. RELEASE IN PROGRESS DUE TO THIS EVENT? ☐ YES (PROCEED TO BLOCK 6) ☐ NO (PROCEED TO BLOCK 9)

6. AIRBORNE RELEASE TO ENVIRONMENT	7. TYPE OF RELEASE (mark all that apply)	8. PROJECTED DURATION OF RELEASE:
[A] BELOW FEDERAL LIMITS (No High High KAMAN alarm) [B] AT, OR ABOVE, FEDERAL LIMITS (High High KAMAN alarm)	[A] RADIOACTIVE AIRBORNE (FILTERED) [B] RADIOACTIVE AIRBORNE (UNFILTERED) [C] RADIOACTIVE LIQUID	[A] UNKNOWN (4 hour default) [B] RELEASE DURATION _____ hour(s)

9. WIND SPEED: _____ MILES/HR (50m value preferred)

10. WIND DIRECTION: FROM _____ DEGREES (50m value preferred)

11. UTILITY PROTECTIVE ACTION RECOMMENDATIONS

(If this notification is for a PAR change ONLY, note time & date. Otherwise write 'N/A' in 'TIME' and 'DATE' in Block 11.)

PAR DETERMINATION @ TIME: _____ DATE: _____

Unusual Event	Alert	Site Area Emergency
☐ [A] No actions recommended	☐ [B] No actions recommended	☐ [C] Activate the Prompt Alert and Notification System AND Place dairy animals within the entire EPZ on stored feed and covered water.

General Emergency		
☐ [D] *Default Recommendations from EPIP 3.3, OR dose projections ≥ 1 REM TEDE or 5 REM CDE @ 0-2 miles from site boundary.*	☐ [E] *Dose projections ≥ 1 REM TEDE or 5 REM CDE @ 2-5 miles from site boundary.*	☐ [F] *Dose projections ≥ 1 REM TEDE or 5 REM CDE @ 5-10 miles from site boundary.*
Activate the Prompt Alert and Notification System, Place dairy animals within the entire EPZ on stored feed and covered water AND Evacuate within a 2 mile radius and to 5 miles in the downwind subareas.	Activate the Prompt Alert and Notification System, Place dairy animals within the entire EPZ on stored feed and covered water AND Evacuate within a 2 mile radius and to 5 miles in the downwind subareas, and shelter downwind subareas from 5 miles to EPZ edge.	Activate the Prompt Alert and Notification System, Place dairy animals in the entire EPZ on stored feed and covered water AND Evacuate within a 2 mile radius, evacuate from 2 miles to EPZ edge in downwind subareas, and shelter as appropriate beyond EPZ edge.

12. ADDITIONAL INFORMATION :

13. APPROVED BY: _____ (DATE) _____ (TIME) _____
(OSM, EC, or ER&RD)

14. STATE PROTECTIVE ACTIONS	0-2 m	2-5 m	5-10 m	10-EPZ
Shelter Subareas (circle appropriate subareas)	1	2, 3, 4, 5, 6, 7, 8	9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22	23,24
Evacuate Subareas (circle appropriate subareas	1	2, 3, 4, 5, 6, 7, 8	9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22	23,24

MESSAGE TRANSMITTED BY:	FINAL ROLL CALL (INITIALS)
Name: _____ Facility: _____ Time: _____	Benton : _____ Linn : _____ Iowa EMD : _____

DAEC EMERGENCY ACTION LEVEL NOTIFICATION FORM
INSTRUCTIONS FOR USE

Complete the notification form as follows:

INITIAL ROLL CALL - Dial 9999 (#### to stop the ringing) and mark appropriate box for the applicable agency as they answer the initial roll call.

MESSAGE INITIATED - Document the time and date you get at least one agency on the phone.

Read Items 1-13 on Notification Message Above – Read message from Item 1 through to Item 13, (For example, "One, bravo, drill. Two, delta, simulator..." etc.

Items 1, 3, 4, 5, 6, 7, 9, 10 & 11 MUST be accurate – **The accuracy of these items will count towards our DEP Performance Indicator. If any of these items are in error, the Notification is considered inaccurate.**

1. STATUS - Mark the letter corresponding to the appropriate status description. Unless an ACTUAL event is taking place, ALL Drills, Exercises, Table Top Drills and LORT notifications will be marked as "DRILL".
2. FACILITY IN COMMAND & CONTROL - Mark letter corresponding to the facility in command & control. Phone numbers listed are Microwave numbers for the facility.
3. ACCIDENT CLASSIFICATION - Mark the letter corresponding to the latest classification issued by the ERO facility.
4. EAL CLASSIFIED - Fill in the time and date at which this new accident classification was determined. If this notification is for a **PAR change ONLY**, write "N/A" for information in Block 4.

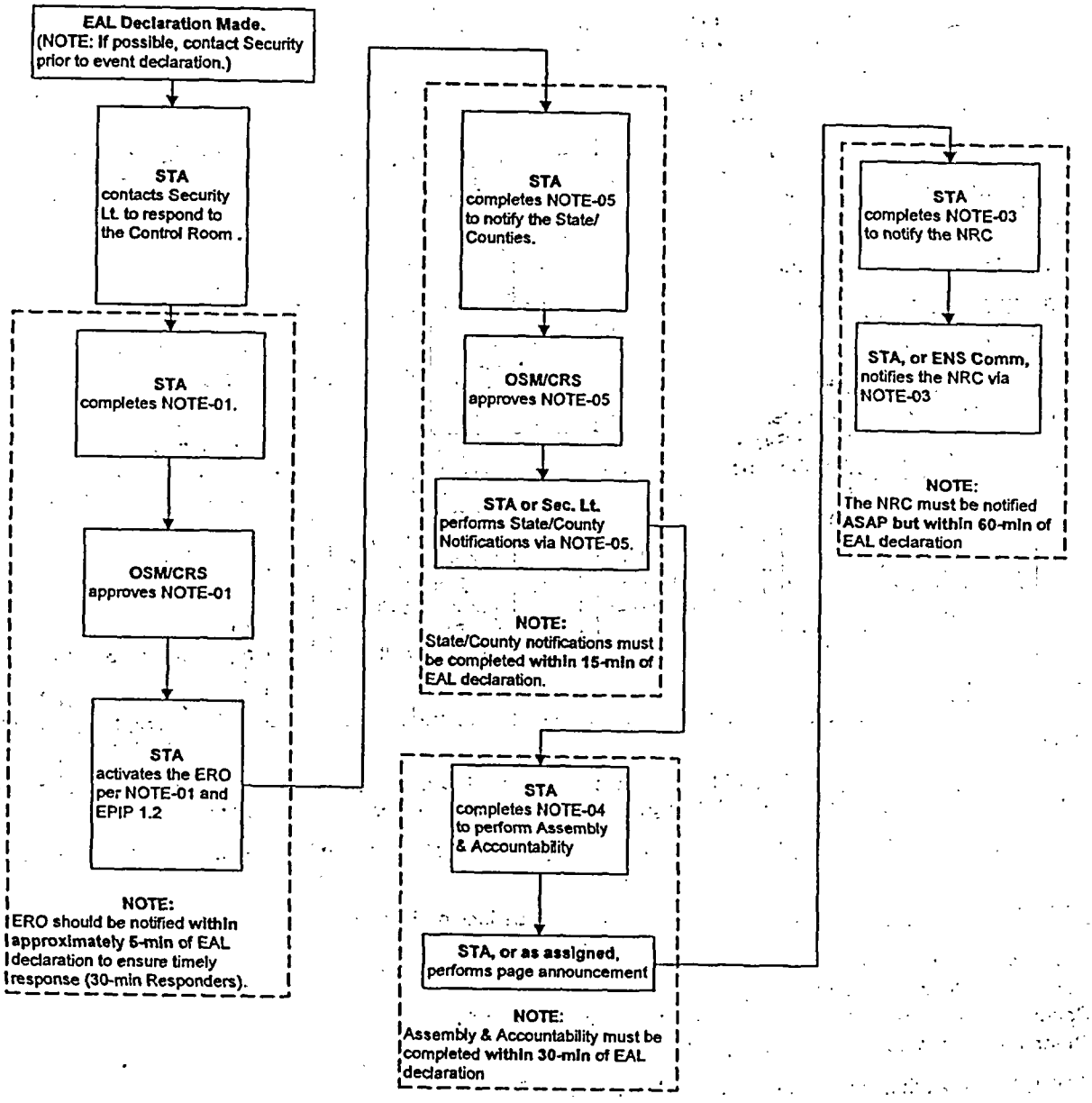
   EAL - Fill in and circle the current On-Site Emergency Action Level (EAL) code number.
5. RELEASE IN PROGRESS DUE TO THIS EVENT? – Mark if a release is occurring due to this event and proceed to the applicable block.
6. AIRBORNE RELEASE TO ENVIRONMENT - Mark the letter corresponding to the appropriate description.
7. TYPE OF RELEASE - Mark the letter(s) corresponding to the appropriate release type(s). Filtered releases flow through any operable Standby Gas Treatment System, or Offgas System, to Offgas stack. An unfiltered release is one that is entering the environment by a path other than the SBGT System. If a **RADIOACTIVE LIQUID** release is in progress, contact the Site Rad Protection Coordinator for additional information and support. If the release has multiple paths to the environment, mark ALL appropriate types of releases.
8. PROJECTED DURATION OF RELEASE - Mark the letter corresponding to the appropriate release duration. If the release duration is known, indicate appropriate hours and minutes that the release will last.
9. WIND SPEED - Fill in the wind speed in miles/hour. The 50 meter value is the preferred value to use. If it is unavailable then use the 10 meter value. If both are unavailable, contact the National Weather Service @ 1-800-803-9357
10. WIND DIRECTION - Fill in the direction in degrees, **from** where the wind is originating. The 50 meter value is the preferred value to use. If it is unavailable then use the 10 meter value. If both are unavailable, contact the National Weather Service @ 1-800-803-9357
11. PROTECTIVE ACTION RECOMMENDATIONS - Check one of the boxes corresponding to the appropriate default Protective Action Recommendation. Refer to EPIP 3.3 for guidance on Protective Action decision-making.

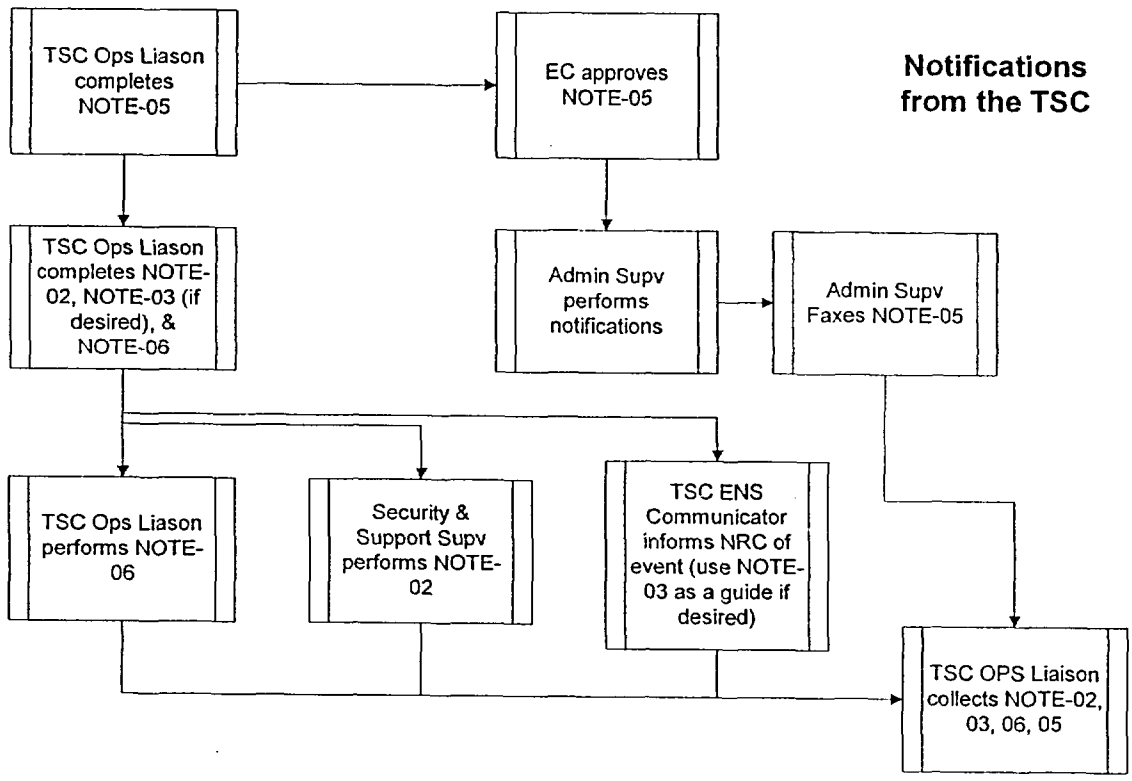
    PAR DETERMINATION – If this notification is for a **PAR change ONLY**, note time & date. Otherwise write 'N/A' in 'TIME' and 'DATE' in Block 11.
12. ADDITIONAL INFORMATION - Additional information should be included when:
    - A wind shift results in additional downwind subareas (see EPIP 3.3 Att. 2)
    - Corrections to current State/County notifications are made
    - Specify initiating condition for EALs with multiple initiating conditions
    - Other information deemed necessary to inform the State and Counties
13. APPROVED BY – Authorizing signature of OSM, EC, or ER&RD.
14. STATE PROTECTIVE ACTIONS – IF AVAILABLE, circle subareas the STATE has chosen to shelter or evacuate. If not available, leave this section blank.

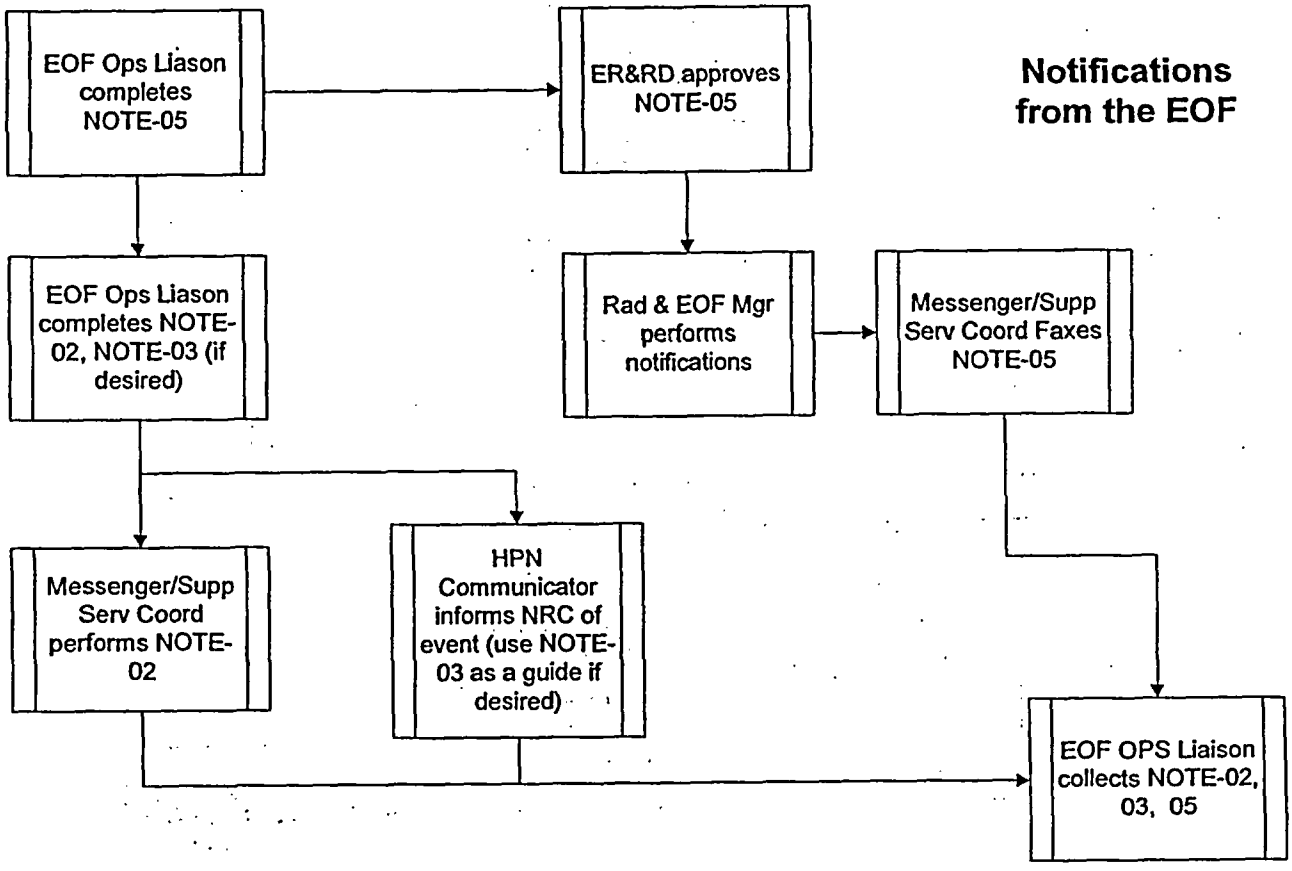
    MESSAGE TRANSMITTED BY – Applicable Communicator writes in their name, ERO facility in Command & Control, and time message completed.

    FINAL ROLL CALL – Enter initials of agency representatives receiving this notification.

Notifications from the Control Room




TSC Ops Liason completes NOTE-05
EC approves NOTE-05
Notifications from the TSC
TSC Ops Liason completes NOTE-02, NOTE-03 (if desired), & NOTE-06
Admin Supv performs notifications
Admin Supv Faxes NOTE-05
TSC Ops Liason performs NOTE-06
Security & Support Supv performs NOTE-02
TSC ENS Communicator informs NRC of event (use NOTE-03 as a guide if desired)
TSC OPS Liaison collects NOTE-02, 03, 06, 05


EOF Ops Liason completes NOTE-05
ER&RD approves NOTE-05
Notifications from the EOF
EOF Ops Liason completes NOTE-02, NOTE-03 (if desired)
Rad & EOF Mgr performs notifications
Messenger/Supp Serv Coord Faxes NOTE-05
Messenger/Supp Serv Coord performs NOTE-02
HPN Communicator informs NRC of event (use NOTE-03 as a guide if desired)
EOF OPS Liaison collects NOTE-02, 03, 05