

## Nebraska Public Power District

"Always there when you need us"

NLS2008085 September 30, 2008

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555-0001

Subject: Emergency Plan Implementing Procedures Cooper Nuclear Station, Docket No. 50-298, DPR-46

Dear Sir or Madam:

The purpose of this letter is to transmit the following Emergency Plan Implementing Procedures (EPIP) pursuant to the requirements of 10 CFR 50, Appendix E, Section V, "Implementing Procedures":

EPIP 5.7.6 EPIP 5.7.25 Revision 48 Revision 17 Notification Recovery Operations

Should you have any questions concerning this matter, please contact me at (402) 825-2904.

Sincerely,

Day Whatk

David W. Van Der Kamp Licensing Manager

/jo

Enclosures

cc: Regional Administrator w/enclosures USNRC - Region IV

Senior Resident Inspector w/enclosures USNRC - CNS

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AK45 USER

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## ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©

ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©

Correspondence Number: <u>NLS2008085</u>

The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITMENT NUMBER	COMMITTED DATE OR OUTAGE
None		~
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# CNS OPERATIONS MANUAL EPIP PROCEDURE 5.7.6

# NOTIFICATION

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# 1. PURPOSE

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1.1 Provide instructions for initial, follow-up, and termination notifications to responsible State and Local governmental agencies, NRC notifications, initial generation of news releases to the Media, and notifications to other off-site support agencies.

# 2. PRECAUTIONS AND LIMITATIONS

- 2.1 Initial notifications to State/Local agencies shall be performed within 15 minutes of each declaration of an Emergency and/or change in Protective Action Recommendations (PARs).©<sup>1,2</sup>
- 2.2 NRC notification shall be performed immediately following notification of responsible State and Local governmental agencies, and not later than 1 hour after the time of declaration of one of the emergency classes.
- 2.3 At an ALERT or higher classification, follow-up notifications to responsible State and Local governmental agencies shall be performed approximately every 60 minutes, or sooner if there is a significant change in the status of the emergency.<sup>®</sup><sup>1,2</sup>
- 2.4 Section 8, "Release Information" of the Notification Report, is completed only when both of the following conditions exist:

2.4.1 Follow-up notification.

2.4.2 A release of Airborne Radioactive material greater than ODAM limits is occurring or occurred during the event.

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- 2.5 Notification of termination to off-site agencies shall be performed within 1 hour after the termination of the emergency.
- 2.6 If the Control Room must be evacuated and off-site notification responsibilities have <u>not</u> been transferred to the EOF, the Shift Communicator shall perform off-site notifications over the State Notification Telephone from the TSC or EOF.
- 2.7 The Emergency Director shall be immediately notified of any difficulties or delays in completing this procedure.

## 3. ENTRY CONDITIONS

3.1 An Emergency has been declared per Procedure 5.7.1.

## 4. CONTROL ROOM ACTIONS

- 4.1 NOTIFICATIONS FROM CONTROL ROOM.
  - 4.1.1 Emergency Director (ED) direct Operator or Shift Technical Engineer to complete Notification Report per Attachment 1.
  - 4.1.2 ED review form for accuracy.
  - 4.1.3 ED add remarks to the Remarks Section as appropriate.
  - 4.1.4 ED sign form including date/time.

**NOTE** – The PMIS FAX sent to the TSC and EOF is received on the TSC Administrative Assistant printer and EOF Dose Assessment printer.

- 4.1.5 If PMIS FAX available, ED authorize notification to be PMIS faxed to State/Local agencies, NRC Operations Center, TSC, and EOF by providing PMIS password to Operator or Shift Technical Engineer.®
- 4.1.6 ED direct Shift Communicator to make notifications per Attachment 4.

# 5. EOF ACTIONS

- 5.1 NOTIFICATIONS FROM EOF
  - 5.1.1 Emergency Director (ED) direct Off-Site Communicator to complete Notification Report per Attachment 1.
  - 5.1.2 ED review form for accuracy.
  - 5.1.3 ED add remarks to the Remarks Section as appropriate.
  - 5.1.4 ED sign form including date/time.

**NOTE** – The PMIS FAX sent to the TSC and EOF is received on the TSC Administrative Assistant printer and EOF Dose Assessment printer.

- 5.1.5 If PMIS FAX available, ED authorize notification to be PMIS faxed to State/Local agencies, NRC Operations Center, TSC, and EOF by providing PMIS password to Off-Site Communicator.®
- 5.1.6 ED direct Off-Site Communicator to make notifications per Attachment 5.

## 6. RECORDS

6.1 Attachments 3, 4, and 5 from actual events shall be forwarded to the EP Manager within 5 working days of their completion (quality record upon completion).

# ATTACHMENT 1 COMPLETING NOTIFICATION FORM WITH CNS-DOSE AVAILABLE

ATTACHMENT 1 COMPLETING NOTIFICATION FORM WITH CNS-DOSE AVAILABLE

<u>**CAUTION**</u> – If CNS-DOSE is not available, notify ED and complete Notification Form using Attachment 2.

- 1. COMPUTER DOSE PROJECTION/AUTOMATED NOTIFICATION REPORT
  - 1.1 On a PMIS terminal, enter turn-on code "DOSE", or if performing subsequent notifications, return to the "MET/RAD Input" dose page.
  - 1.2 Complete Notification Report using on-line instructions.
  - 1.3 Deliver printed Notification Report to the ED to complete the Remarks Section and approve the notification.
    - 1.3.1 The ED should enter information that will be useful to the off-site agencies in understanding the event, plant conditions, or release information. If dose projections at 10 miles are ≥ 1 REM TEDE or 5 REM CDE, enter "Projected dose at or beyond 10 miles exceed evacuation criteria".
  - 1.4 Verify ED signature, date, and time are on the Notification Report and PMIS fax using the on-line instructions.®
  - 1.5 Provide completed Notification Report to the Communicator.

# ATTACHMENT 2 COMPLETING NOTIFICATION FORM WITH CNS-DOSE NOT AVAILABLE®

ATTACHMENT 2 COMPLETING NOTIFICATION FORM WITH CNS-DOSE NOT AVAILABLE®

- 1. COMPLETE NOTIFICATION FORM
  - 1.1 Obtain copy of Attachment 3, Notification Report.
  - **<u>NOTE</u> 1 Initial Notifications:** Steps 1.2 through 1.19 and 1.28 are required.
  - **NOTE 2 Follow-Up Notifications:** Steps 1.2 through 1.28 are required.
  - **NOTE 3 Termination Notifications:** Steps 1.2 through 1.9 and 1.28 are required.
  - 1.2 **Notification Report Number:** Enter 1 or the next sequential number if more than one has been generated during the event.
  - 1.3 Time of Transmittal: Leave blank.
  - 1.4 Initial or Follow-Up Report:
    - 1.4.1 Check Initial Report for EAL classifications or change in PAR.
    - 1.4.2 Check <u>Follow-Up</u> Report for all others including termination.
  - 1.5 Name of CNS Communicator: Leave blank.
  - 1.6 Classification: Check the Emergency Classification.
  - 1.7 **EAL Number:** Enter the EAL number (e.g., 1.1.2).

**<u>CAUTION</u>** – PAR changes do not affect Emergency Declaration Time.

- 1.8 Event Declared (Date/Time): Enter time and date of the Emergency Declaration in military format (e.g., 14:18).
- 1.9 Event Terminated (Date/Time): Enter time and date of the termination in military format (e.g., 14:18).

RELEASE POINT	PRIMARY	BACKUP	DEFAULT VALUES
ERP	CNS DOSE or 100 M MET	60 M MET	13 mph and D Stability Class
All Other Points	CNS DOSE or 10 M MET	60 M MET	8 mph and D Stability Class

1.10 Wind Speed: Enter wind speed in MPH.



## ATTACHMENT 2 COMPLETING NOTIFICATION FORM WITH CNS-DOSE NOT AVAILABLE®

<u>NOTE</u> – If MET and/or Dose Assessment Program is not available, obtain the wind direction either by accessing PMIS Point ID MET006, MET014, MET023, or MET030, OR by calling the National Weather Service (NWS) per the Emergency Telephone Directory - Federal Tab.

- 1.11 Wind From: Enter the direction (e.g., if the wind is coming from the east, enter 90).
- **NOTE** If it is currently raining, SPDS MET will have message "It is raining".
- 1.12 Precipitation (Yes/No): Check Yes if there is precipitation. Check No if it is not.
- 1.13 Stability Classification (A-G): Check Stability Class (A-G).

## 1.14 Release Status (Is/Was/Will-Be):

- 1.14.1 **Is:** Enter Is if release is currently in excess of ODAM limits or no release in progress/expected.
- 1.14.2 **Was:** Enter Was if release is now less than ODAM limits.
- 1.14:3 Will-Be: Enter Will-Be if release in excess of ODAM limits is expected.

## 1.15 Release Type (No/Airborne/Liquid):

- 1.15.1 **No:** Check No if releases are currently below ODAM limits.
- 1.15.2 **Airborne:** Check Airborne if release is, was, or will-be in excess of ODAM limits for airborne activity.
- 1.15.3 Liquid: Check Liquid if release is, was, or will-be in excess of ODAM limits for liquid activity.

## 1.16 **Protective Action Recommandations:**

- 1.16.1 Enter PARs as determined by CNS-DOSE or per Procedure 5.7.20.
- 1.16.2 Verify PAR includes previous PARs if they have changed.
- 1.16.3 For every NOUE and Alert, or any SAE classification that is not dose based, if the Emergency Director has determined the PARs to be none, place "ALL" in each of the three rows in the None column.
- 1.16.4 For any GE PAR:
  - 1.16.4.1 Check the appropriate box indicating if the PAR is an Evacuation or Shelter PAR.
  - 1.16.4.2 Enter the sectors in the appropriate rows for the distance from site.

Procedure 5.7.6	<b>REVISION 48</b>	PAGE 6 OF 15
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# 1.17 **Prognosis (Stable/Unstable):**

- 1.17.1 Check <u>Stable</u> if the event is not likely to degrade.
- 1.17.2 Check <u>Unstable</u> if the event is degrading (e.g., RPV level is lowering or Containment Rad Monitors are trending upward).
- 1.18 **Plant Status (at Power/Shutdown):** Check appropriate box. Check "Power" if the reactor is not shutdown under all conditions (with or without boron); otherwise, check "Shutdown".
- 1.19 **Remarks:** Enter information that will be useful to the off-site agencies in understanding the event, plant conditions, or release information. If dose projections at 10 miles are greater than or equal to 1 REM TEDE or 5 REM CDE, enter "Projected dose at or beyond 10 miles exceed evacuation criteria".
- 1.20 **Section 8, "Release Information"** of the Notification Report is completed only when both of the following conditions exist:
  - 1.20.1 Follow-up notification.
  - 1.20.2 A release of airborne radioactive material greater than ODAM limits is occurring or occurred during the event.
- 1.21 Release From: Check the location that was or is exceeding ODAM limits.
- 1.22 **Release Height:** Check 100 M for ERP and 10 M for any building release. Other is checked if the release is not from a building.
- 1.23 **Release Duration:** If duration is unknown, use the default of 4 hours.
- 1.24 **Start Time:** Enter release start time (e.g., 14:18).
- 1.25 Stop Time: Enter release stop time if known; otherwise, enter "UNK".
- 1.26 **Release Rate (μCi/sec):** Enter release rate in μCi/sec.
- 1.27 **Projected Integrated Dose (Rem) and Projected Dose Rate (Rem/hr):** Are obtained from CNS DOSE or by hand calculations per Procedure 5.7.17.
- 1.28 Deliver to ED to add remarks, signature, date, and time.

# ATTACHMENT 3 COOPER NUCLEAR STATION NOTIFICATION REPORT

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No	tification Re	eport l	Number	:			Ti	me of `	Transmittal:
[]	Initial Repo	ort (Co	mplete	Sections	1-7 only)				[] Follow-Up Repor
1)	Name of C	NS Co	ommunio	cator:			Call Back N	umber	: 402-825-
2)	Classificat	ion: [	] NOUE	;[]Alert	;; [ ] Site Area	; [ ] Gene	eral	EAL N	lumber:
Ev	ent Declare	d (Dat	e/Time):			Event T	erminated (Date/	Time):	
3)	Meteorolog Conditions	gical S	Wind S	peed:	мрн и	Vind From	: Degrees	Precip	pitation: []Yes;[]No
	Stability C	lass: [	] A; [ ]	B;[]C;	[]D;[]E;[	]F;[]G			
4)	ODAM Airl ERP = 7.28 TG Buildin RX Buildin	borne 3E5 μC ig = 3. ig = 3.	Release Ci/sec 6E4 μCi/ 3E4 μCi/ 2 6E4 μCi/	Values: /sec /sec	There [ ] is	[ as [	] no F ( ] an airborne	Release Greater	e of Radioactive Materia than ODAM Limits.
		ing =	<b>3.8⊏4</b> μ	CI/Sec	[ ] wi	ill be [	] a liquid		
5)	Protective radius/5 m	Actio	n Recor wnwind	nmendati , go indo	ons (PARS): ( ors, and monif	General Ei tor EAS re	mergency Autom emainder 10 mile	atic PA EPZ.	AR - Evacuate 2 mile
		N	one	[ ] Evac [ ] Shelt	uate Sectors er Sectors		Go indoors and	d moni	tor EAS in Sectors
	0-2 Miles								
	2-5 Miles								
Ę	5-10 Miles								· · · · · · · · · · · · · · · · · · ·
6)	Prognosis	:[]St	table; [ ]	Unstable		Pla	ant Status: [ ] at F	ower;	[] Shutdown
7)	Remarks:								
8)	Release In	forma	tion (red	quired on	follow-up Not	ification v	with airborne rele	ase > (	ODAM limits):
Re	lease From:	[]EF	RP; [ ] R	eactor Bu	ilding; [ ] Turbi	ne Building	g; [ ] Aug Radwas	te Build	ding; [ ] Other:
Re	lease Heigh	<b>t:</b> []1	00 M (E	RP); [ ] 1	D M (RB, TB, A	RWB); [ ]	Other:	ft Re	elease Rate (μCi/sec)
Est	timated Dur	ation:			_ (Hours)		Noble Gas:		μCi/sec
	Start	Time:			-		lodides:	i	<u>N/A</u>
	Stop	Time:			- <u> </u>		Particulate:		N/A
	Distance		Proje	cted Integ	grated Dose (F	Rem)	Projecte	ed Dos	e Rate (Rem/hr)
	Plant		TEI	DE	CDE (TH	nyroid)	TEDE		CDE (Thyroid)
Si	te Boundary	/							
	2 Miles								
	5 Miles					<u></u>			
	10 Miles								
			0:				Data		Time

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# ATTACHMENT 4 SHIFT COMMUNICATOR

ATTACHMENT 4 SHIFT COMMUNICATOR

# Notification Report Number: \_

- 1. When directed to perform notification to State and Local Government agencies, perform the following:
  - 1.1 Verify ED considered providing comments in Remarks Section (optional) on Notification Report.
  - 1.2 Verify ED signature/date/time.
  - 1.3 Print your name on Notification Report, Block 1.
  - 1.4 Print call back number (normally 4511) on Notification Report, Block 1.
  - 1.5 Contact State/Local Agencies using State Notification Telephone System by pressing the "Group Call" button or 7450 from any phone.

NOTIFY FOLLOWING AGENCIES	PHONE	SPEED DIAL #	TIME ON LINE	NAME OF CONTACT
NEMA via Nebraska State Patrol		04		
Nemaha County EOC via Nemaha County Sheriff	State	20		
Richardson County EOC via Richardson County Sheriff	Notification Telephone	21		
Missouri SEMA via Missouri Highway Patrol	System	22		
Atchison County EOC via Atchison County 911 Center		19		

**<u>NOTE</u>** – If communication is lost with one or more agencies, continue to make notifications to on-line parties. When notifications are complete, call back agencies missing and make report.

- 1.6 Record time last party on line as "Time of Transmittal" on Notification Report.
- 1.7 When all parties are on line, verify that they have received the PMIS faxed notification. Only information on the form is allowed to be communicated unless authorized by the ED.<sup>®</sup>
  - 1.7.1 If PMIS FAX not received, read the Notification Report line by line.
- 1.8 Notify ED of the "Time of Transmittal" and that notification to State/Local agencies is complete.
- 1.9 Notify ED of the time follow-up Notification is required.

# ATTACHMENT 4 SHIFT COMMUNICATOR

- 2. Contact NRC Headquarters via ENS immediately after Step 1.8 and not later than <u>60 minutes</u> after declaration of an emergency.
  - 2.1 Be prepared to provide additional information/explanation to the NRC that may not be provided on the standard Off-Site Notification Form. Examples of information may be:
    - 2.1.1 Reactor power and Mode before/after emergency declaration.
    - 2.1.2 Explanation of the reason for declaring the emergency.
    - 2.1.3 Additional 10CFR50.72 categories that may be applicable.
    - 2.1.4 Status of notification to the NRC Resident Inspector.
    - 2.1.5 Has any off-site assistance been requested?
    - 2.1.6 Is a news release being planned?

NRC	CNS TELEPHONE	ALTERNATE	PERSON CONTACTED	TIME
	Dial # on Phone Sticker	ETD or Speed Dial - 10		

3. When contacted by ENS Communicator in TSC, transfer NRC notification responsibilities and notify SM/ED. ENS communications from the TSC are performed in accordance with Procedure 5.7ENS.

NAME OF ENS COMMUNICATOR	PERFORMED BY	TIME

**NOTE** – Shift Communicator duties for notification of States and Counties shall only be transferred to the Off-Site Communicator in the EOF concurrent with the transfer of ED duties to the On-Call ED in the EOF.

4. When contacted by Off-Site Communicator in EOF, transfer Off-Site Notification responsibilities.

NAME OF OFF-SITE COMMUNICATOR	PERFORMED BY	TIME
		L

Communicator Signature:

Date: \_

## ATTACHMENT 5 OFF-SITE COMMUNICATOR

ATTACHMENT 5 OFF-SITE COMMUNICATOR

# Notification Report Number: \_

- 1. When directed to perform notification to State and Local Government agencies, perform the following:
  - 1.1 Verify ED signature/date/time and Remarks Section on Notification Report.
  - 1.2 Print your name and call back number on Notification Report, Block 1.
  - 1.3 Contact State/Local Agencies using State Notification Telephone System by pressing the "Group Call" button or 7450 from any phone.

NOTIFY FOLLOWING AGENCIES	PHONE	SPEED DIAL #	TIME ON LINE	NAME OF CONTACT
NEMA via Nebraska State Patrol		04		
Nemaha County EOC via Nemaha County Sheriff	State	20		
Richardson County EOC via Richardson County Sheriff	Notification Telephone	21		
Missouri SEMA via Missouri Highway Patrol	System	22		
Atchison County EOC via Atchison County 911 Center		19	·	

**<u>NOTE</u>** – If communication is lost with one or more agencies, continue to make notifications to on-line parties. When notifications are complete, call back agencies missing and make report.

- 1.4 Record time last party on line as "Time of Transmittal" on Notification Report.
- 1.5 When all parties are on line, verify that they have received the PMIS faxed notification. Only information on the form is allowed to be communicated unless authorized by the ED.<sup></sup>●
  - 1.5.1 If PMIS FAX not received, read the Notification Report line-by-line.
- 1.6 Notify ED of the "Time of Transmittal" and that notification to State/Local agencies is complete.
- 1.7 Notify ED of time follow-up notification is required.

# ATTACHMENT 5 OFF-SITE COMMUNICATOR

2. Perform notifications to the following support agencies, as soon as possible, after the declaration of an ALERT or higher emergency classification, but not until after all notifications are completed as required in Section 1.

AGENCY	PHONE	PERSON CONTACTED	TIME
INPO	(800) 321-0614		
American Nuclear Insurers (ANI)	(860) 682-1301		

Communicator Signature:

Date: \_



# ATTACHMENT 6 INFORMATION SHEET

ATTACHMENT 6 INFORMATION SHEET

### 1. DISCUSSION

- 1.1 All notifications and communications will be handled from the Control Room (CR) until the Technical Support Center (TSC) and Emergency Operations Facility (EOF) are activated. The responsibility of generating news releases to the media may be transferred to NPPD Corporate Communications Department personnel prior to activation of the Joint Information Center (JIC).
- 1.2 During a declared Emergency at CNS, Emergency notifications to the State of Nebraska; State of Missouri; Atchison County, Missouri; and Nemaha and Richardson Counties in Nebraska are accomplished through the State Notification Telephone System. The CNS State Notification Telephone System is a conference-calling system. When the handset to this hotline is picked up, and the "Group Call" button is pushed, dedicated telephones will automatically ring at Nebraska State Patrol, Missouri Highway Patrol, Atchison County 911 Center, and Nemaha and Richardson County Sheriff's Departments. The utilization of law enforcement agencies and emergency services dispatch centers as initial points of contact provides for 24 hour coverage. The dedicated lines listed also have extension lines which ring at the following facilities: Nebraska Emergency Management Agency EOC, Nemaha County EOC, and Richardson County EOC. Once the EOCs become operational, notifications may be made using the extension lines at the EOCs with concurrence between the respective EOC and law enforcement/911 agencies.
- 1.3 Notifications to the NRC are normally accomplished through the Emergency Notification System (ENS). The Emergency Notification System is a dedicated telephone system which is manned 24 hours by the Duty Officer at the NRC Headquarters Operations Center.
- 1.4 During any notification activity, if the primary communications system fails, communication methods shall be attempted such as alternate telephones, National Warning System (NAWAS), base station radio, or relay through a third party. Alternate telephone numbers are listed in the Emergency Telephone Directory.
- 1.5 At an ALERT or higher emergency classification, to receive continuous and detailed information, the NRC will likely request an open line of communication with the Control Room (CNS) until the TSC is operational.
- 1.6 The Public Affairs Duty Officer (PADO) shall be notified by pager by the CNS ANS and instructed to contact the Control Room. Upon being contacted by the PADO, the Control Room will ensure that the following is relayed to the PADO:
  - 1.6.1 Emergency Classification.
  - 1.6.2 EAL Number.
  - 1.6.3 Time of EAL Classification.



# ATTACHMENT 6 INFORMATION SHEET

- 1.6.4 Brief description of event.
- 1.7 Request a telephone number in which the PADO can be reached.
- 1.8 PADO functions shall be superseded by the activation of the Joint Information Center (JIC). The JIC shall receive follow-up information from the EOF.
- 1.9 The Emergency Preparedness Coordinator should assume the responsibility of coordinating news releases after being notified and responding to a Notification of Unusual Event (NOUE).
  - 1.9.1 Assist the Control Room in ensuring communications are established with the PADO per Procedure 5.7.23.
  - 1.9.2 This responsibility shall be for the period immediately after the declaration of the NOUE and continue until the responsibility is transferred to appropriate NPPD Corporate Communications Department personnel.
  - 1.9.3 Any news release that is generated during this period should be reviewed and approved by the Emergency Director.
- 1.10 Authorized Representatives of the Governors of Nebraska and Missouri may be represented in the EOF and set up Forward Command Posts at some other location.

## 2. REFERENCES

- 2.1 CODES AND STANDARDS
  - 2.1.1 10CFR50.
  - 2.1.2 NPPD Emergency Plan for CNS.
- 2.2 PROCEDURES
  - 2.2.1 Emergency Plan Implementing Procedure 5.7.1, Emergency Classification.
  - 2.2.2 Emergency Plan Implementing Procedure 5.7.20, Protective Action Recommendations.
  - 2.2.3 Emergency Plan Implementing Procedure 5.7.23, Activation of the JIC.

## 2.3 MISCELLANEOUS

- 2.3.1 CNS Emergency Telephone Directory.
- 2.3.2 NCR 93-52.
- 2.3.3 NRC Inspection Report 89-35, Item 1.
- 2.3.4 NRC Inspection Report 94-11.

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### ATTACHMENT 6 INFORMATION SHEET

- 2.3.5 NRC Inspection Report 94-29, Item 1.
- 2.3.6 QA Observation 93-05A.
- 2.3.7 QA Report 86-06.
- 2.3.8 RCR 2002-0181, Action #2, Require State/Local Notification within 15 minutes of a PAR or change in PAR.
- 2.3.9 D SCR 2002-2290, Action #14, Specifies PMIS FAX. Affects Steps 4.1.5 and 5.1.5, Attachment 1, Step 1.4, Attachment 4, Steps 1.7 and 1.7.1, and Attachment 5, Steps 1.5 and 1.5.1.
- 2.3.10 D SOER 99-1, Addendum, Loss of Grid. Affects Attachment 2.
- 2.3.11 (P) TIP Action Plan 5.2.2.1, Revision 1, Action 1. Major revision 6/28/02 to clarify Control Room tasks. Generic nature of TIP Action does not support cross-referencing of specific steps.

#### 2.4 NRC COMMITMENTS

- 2.4.1 ©<sup>1</sup> NRC Inspection Report 92-14. Commitment affects Steps 2.1 and 2.3.
- 2.4.2 ©<sup>2</sup> NRC Inspection Report 98-12 (Commitment Numbers NLS980074-05 and NLS980074-06). Commitment affects Steps 2.1 and 2.3.

## CNS OPERATIONS MANUAL EPIP PROCEDURE 5.7.25

**RECOVERY OPERATIONS** 

USE: REFERENCE QUALITY: QAPD RELATED EFFECTIVE: 9/25/08 APPROVAL: ITR-RDM OWNER: J. G. KELSAY DEPARTMENT: EP

1.	PURPOSE	.1
2.	PRECAUTIONS AND LIMITATIONS	.1
3.	REQUIREMENTS	.1
4.	DETERMINATION OF STATION DAMAGE AND CONTAMINATION	.2
5.	REPAIR, MODIFICATION, AND DECONTAMINATION	.2
6.	NRC RESPONSE	.3
	ATTACHMENT 1 INFORMATION SHEET	.4

# 1. PURPOSE

- 1.1 This procedure describes the general guidelines used to determine whether or not an emergency is under control, the damage and radiological surveys necessary prior to recovery operations, and the organizational control of recovery operations.
- 2. PRECAUTIONS AND LIMITATIONS
  - 2.1 Following any emergency involving radiological hazards, exposure to personnel should be kept as low as reasonably achievable consistent with the nature of the recovery operation required.
  - 2.2 Recovery operations commence with the station in a controlled, stable condition. <u>No</u> action is to be taken which might jeopardize this condition without the approval of the Site Vice President.
  - 2.3 Continually monitor station conditions. Be prepared to re-escalate the Emergency Class should conditions degrade.

# 3. REQUIREMENTS

- 3.1 Ensure the following equipment and materials are available, as needed:
  - 3.1.1 Recovery operations will be performed using existing station equipment to the maximum extent possible. Special and/or additional equipment will be obtained when required to complete the recovery operation in a safe and efficient manner.
- 3.2 Radiation levels are stable or decreasing with time.
- 3.3 Releases of radioactive materials to the environment have ceased or are controlled within permissible license limits.

- 3.4 Fire, flooding, or other similar emergency conditions no longer constitute a hazard to the station or station personnel.
- 3.5 Measures have been successfully instituted to correct or compensate for malfunctioning equipment or barriers designed to contain radioactive materials.
- 4. DETERMINATION OF STATION DAMAGE AND CONTAMINATION
  - 4.1 INITIAL STATION SURVEY
    - 4.1.1 For known or significant station damage, and at the discretion of the General Manager of Plant Operations, survey teams will be formed consisting of Operations, Engineering, Maintenance, and Radiological Protection personnel.
    - 4.1.2 These teams, following pertinent guidance contained in Procedure 5.7.15, will perform an organized survey of the station to ascertain the extent of physical damage and areas of contamination/high radiation. The results of these initial surveys will be used by the General Manager of Plant Operations and Radiological Manager in planning the detailed surveys described below.

## 4.2 DETAILED STATION SURVEYS

- 4.2.1 Using the information obtained above, the Radiological Manager will dispatch properly equipped Radiological Protection Technicians to perform detailed surveys of any areas known to contain radiological hazards.
  - 4.2.1.1 Each area shall be posted and access controlled per Radiological Protection procedures.
  - 4.2.1.2 Station Radiological Survey Maps will be used to record the boundaries of these areas.
  - 4.2.1.3 Station Chemistry Technicians may be dispatched to take and analyze a reactor coolant sample if conditions dictate.
  - 4.2.1.4 Provisions have been made to take and analyze coolant and containment samples within 3 hours of the time a decision is made that samples are required.

## 5. REPAIR, MODIFICATION, AND DECONTAMINATION

### 5.1 PLANNING

- 5.1.1 Activities such as modification, decontamination, installation, repair, and maintenance of existing station system components and determining the need for additional manpower, portable shielding, special procedures, environmental concerns, etc., will be discussed, prioritized, and planned.
- 5.1.2 Scheduling Manager and Maintenance Manager will develop an overall schedule to guide, track, and expedite the recovery effort.

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#### 5.2 TRAINING

5.2.1 CNS Training Manager will coordinate the development and conduct of specific training for personnel needed to assist in recovery operations. Special training materials will be developed and training conducted as needed for special work tasks.

## 5.3 RECOVERY IMPLEMENTATION

- 5.3.1 The Emergency Director shall determine the emergency to be under control and activate the Recovery Panel as per Section 9.0 of the Emergency Plan.
- 5.3.2 Normal station practices will be followed concerning maintenance, repair, modification, decontamination, and personnel exposure control wherever practical.
- 5.3.3 Radiological Manager, in coordination with state and federal officials, will periodically estimate total population exposure.
- 5.3.4 As recovery operations proceed, any unforeseen problems encountered will be evaluated and factored into the recovery plan. The schedule will be adjusted accordingly.
- 5.3.5 Technical Specification, Technical Requirements Manual, and Off-Site Dose Assessment Manual compliance will be verified prior to resuming normal station operations.

### 6. NRC RESPONSE

- 6.1 During an accident, NRC response may be expected for all severe events resulting in the declaration of an Emergency Classification. Provisions have been made to accommodate these co-located, advisory personnel.
- 6.2 POST-ACCIDENT
  - 6.2.1 Depending upon the severity of the event or equipment involved, the NRC may decide to form an Incident Investigation Team for dispatch to the site. Every effort will be made to accommodate and cooperate with this team in their investigation. The primary contact for this team will be the Site Vice President.

# ATTACHMENT 1 INFORMATION SHEET

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## 1. **DISCUSSION**

- 1.1 Recovery operations allow for the smooth transition from Emergency Response Organization operations to normal operations with the safety of the public and station personnel being of the utmost priority.
- 1.2 Based on the consideration of general guidelines, the Emergency Director shall determine the emergency to be under control and activate the Recovery Panel as per Section 9.0 of the Emergency Plan.
- 1.3 The purpose of the Recovery Panel is to evaluate emergency termination considerations, plant status parameters, and plan for and implement recovery operations. Based upon Recovery Panel discussions, the Site Vice President or designee may initiate the Recovery Organization.
- 1.4 The Recovery Organization as defined in Section 9.0 of the Emergency Plan is made up of the normal Nuclear Power Group organization as Recovery operations will be handled much the same as outage operations, under the control of the Site Vice President or designee.
- 2. REFERENCES
  - 2.1 CODES AND STANDARDS
    - 2.1.1 NPPD Emergency Plan for CNS.
    - 2.1.2 NUREG 0654, Revision 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.
    - 2.1.3 NUREG 0737, Clarification of TMI Action Plan Requirements, November 1980.
  - 2.2 PROCEDURES
    - 2.2.1 Emergency Plan Implementing Procedure 5.7.15, OSC Team Dispatch.
    - 2.2.2 Emergency Plan Implementing Procedure 5.7.23, Activation of the JIC.