

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

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DominionSM

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

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

- MP-26-EPI-FAP02, "Technical Support Center Activation and Operation," Major Revision 005, Minor Revision 0, transmitted via Attachment 1

If you have any questions or require additional information, please contact Mr. William D. Bartron at (860) 444-4301.

Sincerely,

 4/23/09

Robert T. Griffin, Director
Nuclear Station Safety and Licensing

NR5501
AX45
NRR

Attachments: 1

Commitments made in this letter: None.

cc: U.S. Nuclear Regulatory Commission (2 copies)
Region I Regional Administrator
475 Allendale Road
King of Prussia, PA 19406-1415

Mr. J. M. Trapp, Chief
Plant Support Branch 1
U.S. Nuclear Regulatory Commission - Region I
475 Allendale Road
King of Prussia, PA 19406-1945

cc: w/o attachments

Mr. John Hickman
NRC Project Manager
U.S. Nuclear Regulatory Commission, Mail Stop T-7E18
Washington, D.C. 20555

Ms. L. A. Kauffman
Health Physicist - DNMS
U.S. Nuclear Regulatory Commission - Region I
475 Allendale Road
King of Prussia, PA 19406-1945

Ms. C. J. Sanders
NRC Project Manager
U.S. Nuclear Regulatory Commission, Mail Stop 08B3
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Mr. J. M. Goshen
NRC Project Manager - Millstone ISFSI
U.S. Nuclear Regulatory Commission, Mail Stop 3D-02M
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

NRC Senior Resident Inspector
Millstone Power Station

Attachment 1

**EMERGENCY PROCEDURES IMPLEMENTING (EPI)
FUNCTIONAL ADMINISTRATIVE PROCEDURE (FAP)
MP-26-EPI-FAP02, "TECHNICAL SUPPORT CENTER ACTIVATION AND
OPERATION"
MAJOR REVISION 005, MINOR REVISION 0**

**MILLSTONE POWER STATION UNITS 1, 2, 3 AND ISFSI
DOMINION NUCLEAR CONNECTICUT, INC. (DNC)**

**Functional
Administrative
Procedure**



Millstone Station

Technical Support Center Activation and Operation

MP-26-EPI-FAP02

Rev. 005

Approval Date: 4/2/09

Effective Date: 4/8/09



TABLE OF CONTENTS

1. PURPOSE 3
 1.1 Objective 3
 1.2 Applicability 3
 1.3 Supporting Documents 3
 1.4 Discussion 3
2. INSTRUCTIONS 8
3. SUMMARY OF CHANGES 9

ATTACHMENTS AND FORMS

Attachment 1 Definitions and Abbreviations 10
Attachment 2 Responsibilities 12

MP-26-EPI-FAP02-001, "Assistant Director Technical Support (ADTS)"
MP-26-EPI-FAP02-002, "TSC Shift Manager (TSCSM)"
MP-26-EPI-FAP02-003, "Manager of Radiological Consequence Assessment (MRCA)"
MP-26-EPI-FAP02-004, "RMT #2 (NAP-HP and SAP-HP)"
MP-26-EPI-FAP02-005, "Radiological Communicator - TSC"
MP-26-EPI-FAP02-006, "Manager of Technical Support Center (MTSC)"
MP-26-EPI-FAP02-007, "Technical Support Center Reactor Engineer (TSCRE)"
MP-26-EPI-FAP02-008, "Technical Support Center Electrical Engineer (TSCEE)"
MP-26-EPI-FAP02-009, "Technical Support Center Mechanical Engineer (TSCME)"
MP-26-EPI-FAP02-010, "Accident Management Team (AMT)"
MP-26-EPI-FAP02-011, "Manager of Security (MOS)"
MP-26-EPI-FAP02-012, "TSC/OSC Emergency Repair/Procedure Change/Assessment
 Recommendations"
MP-26-EPI-FAP02-013, "Request for Emergency Team"

1. PURPOSE

1.1 Objective

This procedure provides guidance to Station Emergency Response Organization (SERO) personnel who report to the Technical/Operational Support Center (TSC/OSC) during an event.

1.2 Applicability

Activation of the TSC/OSC is initiated upon declaration of an ALERT, State Posture Code Charlie-One, or higher event.

1.3 Supporting Documents

EPI-FAP08, "Evacuation and Assembly"

EPI-FAP09, "Radiation Exposure Controls"

EPI-FAP12, "Thermal Hydraulic Evaluation"

EPI-FAP15, "Common Forms"

OP 3315E, "Technical Support Center Ventilation"

SDI 612, "Security Reports"

SPIP 52, "Security During Emergencies"

SPIP 54, "Medical Emergencies"

C OP 200.3, "Response to Medical Emergencies"

RPM 1.5.4, "Response to a Contaminated Injured Person"

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

1.4 Discussion

1.4.1 Control and Limitations of TSC Ventilation and Capacity

The TSC/OSC ventilation system is designed for 20 persons. Capacity may be exceeded (40 people for up to 6 hours) without exceeding CO₂ limits for team briefings, turnovers, ALARA, or if TSC/OSC is monitored.

1.4.2 10 CFR 50.54(x) Invocation

- a. As discussed in the Statements of Consideration to 10 CFR Part 50, emergencies can arise during which compliance with a license condition or a Technical Specification could prevent necessary action by the licensee to protect the public health and safety. Absolute compliance with the license during these emergencies can be a barrier to effective protective action.

- b. Unanticipated circumstances can occur during the course of an emergency which may call for responses different from any previously considered during the course of licensing. Special circumstances requiring a deviation from license requirements are not necessarily limited to transients or accidents not analyzed in the licensing process. Special circumstances can arise during emergencies involving multiple equipment failures or coincident accidents where plant emergency procedures could be in conflict with or not applicable to the circumstances. In addition, an accident can take a course different from that which was addressed when the emergency procedure was written. This, at times, can lead to a protective response at variance with a procedure required to be followed by the licensee and may be contrary to Technical Specifications or the license condition.
- c. 10 CFR 50.54(x) will permit the licensee to take reasonable action in an emergency even though the action departs from licensing conditions or plant Technical Specifications. This action may only be taken however, if the following criteria are met:
- The action is immediately needed to protect the public health and safety, including plant personnel.
 - No action consistent with the license conditions and Technical Specifications is immediately apparent that can provide adequate or equivalent protection.
 - As a minimum, a licensed senior operator approves the action.
- d. Applicability Determination

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

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

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

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

e. Approval

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

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

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

f. Reportability

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

g. Subsequent Actions

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

1.4.3 On-Site Personnel Protective Action Decisions (PPADs)

The implementation of PPADs is an important function of the TSC/OSC. These PPADs include: evacuating or relocating on-site personnel, providing access control to on-site areas, issuing Potassium Iodide (KI), or radiological controls.

1.4.4 Control of On-Site Technical, Operational, Assessment, and Repair Staffs

The TSC/OSC provides an emergency response facility to control the on-site technical, operational, assessment and repair staffs. This includes performing analysis of plant conditions and corrective actions, providing guidance to the control room regarding returning the plant to a safe condition, providing accident management guidance, and prioritizing assessments for damage, repair and radiological activities.

Once an Alert or higher emergency is declared, Fire Brigade report to their assigned Control Room. Request for dispatch could come directly from the Control Room or from the TSC. Once dispatched, Fire Brigade and the Fire Brigade Advisor should maintain communication with the Control Room for fire, hazmat, or medical events.

Firewatch posts are automatically suspended upon declaration of an Alert or higher declaration. Firewatch personnel would follow instructions for non-essential personnel. After activation of the TSC, the ADTS will discuss the need for reestablishing Firewatch posts with the MCRO.

1.4.5 Protective Actions for Offsite Emergency Responders Located at the Station

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

For an emergency event, radiological or non-radiological, that does *not* involve a security threat, the station would consider these offsite responders as “non-essential” to the event and evacuate them from the site. However, they are still under the State’s authority and the State may require they stay on site.

1.4.6 Definitions and abbreviations are contained in Attachment 1. Responsibilities are contained in Attachment 2.

2. INSTRUCTIONS

2.1 Refer To and complete the following, as applicable:

NOTE

Steps in the position specific checklists may be performed in any order, or more than once, as necessary.

- EPI-FAP02-001, "Assistant Director Technical Support (ADTS)"
- EPI-FAP02-002, "TSC Shift Manager (TSCSM)"
- EPI-FAP02-003, "Manager of Radiological Consequence Assessment (MRCA)"
- EPI-FAP02-004, "RMT #2 (NAP-HP and SAP-HP)"
- EPI-FAP02-005, "Radiological Communicator - TSC"
- EPI-FAP02-006, "Manager of Technical Support Center (MTSC)"
- EPI-FAP02-007, "Technical Support Center Reactor Engineer (TSCRE)"
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- EPI-FAP02-009, "Technical Support Center Mechanical Engineer (TSCME)"
- EPI-FAP02-010, "Accident Management Team (AMT)"
- EPI-FAP02-011, "Manager of Security (MOS)"
- EPI-FAP02-012, "TSC/OSC Emergency Repair/Procedure Change/Assessment Recommendations"
- EPI-FAP02-013, "Request for Emergency Team"

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

3. SUMMARY OF CHANGES

3.1 **Revision 005**

3.1.1 Step 1.4.4, second paragraph, changed "Site Fire Protection" to "Fire Brigade"

Attachment 1

Definitions and Abbreviations

(Sheet 1 of 2)

Definitions

Activation - All functions, minimum staffing requirements, and turnovers have been completed and the senior SERO position in the facility declares it active.

Alpha or Bravo - State of Connecticut posture codes issued with a GENERAL EMERGENCY classification. A technical basis for developing a PAR as a result of that classification.

Charlie-One - State of Connecticut posture code issued with an ALERT classification.

Charlie-Two - State of Connecticut posture code issued with a SITE AREA EMERGENCY classification.

Minimum Staff - Positions in the facility which are necessary before activation may occur.

Mission Specific Exposure Limits - Specific exposure limits based on job task assignments for emergency team members.

Plant Condition - A technical basis for developing a PAR as a result of actual or imminent loss of all 3 fission product barriers, or based on high containment radiation levels.

Unmonitored Release - A suspected or actual release of radioactive material to the environment without passing through an operational process or radiation monitor.

Abbreviations

ADEOF - Assistant Director Emergency Operations Facility

ADTS - Assistant Director Technical Support

AMRDA - Assistant Manager of Radiological Dose Assessment

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

CR-DSEO - Control Room Director of Station Emergency Operations

EAL - Emergency Action Level

EOF - Emergency Operations Facility

ERF - Emergency Response Facility

IRF - Incident Report Form

KI - Potassium Iodide

Attachment 1

Definitions and Abbreviations

(Sheet 2 of 2)

LAN - Local Area Network

MCRO - Manager of Control Room Operations

MOS - Manager of Security

MRDA - Manager of Radiological Dose Assessment

MTSC - Manager of Technical Support Center

OFIS - Off-Site Facilities Information System

OSC - Operational Support Center

PCs - Protective Clothing

PPADs - Personal Protective Action Decisions

SAMG - Severe Accident Management Guidelines

SERO - Station Emergency Response Organization

SSS - Security Shift Supervisor

TIC - Technical Information Coordinator

TSC - Technical Support Center

Attachment 2 Responsibilities

(Sheet 1 of 3)

1. Assistant Director Technical Support (ADTS)

The ADTS is responsible for directing and managing the MCRO, MTSC, MOSC, MRCA, and MOS. The ADTS reports to and assists the DSEO. The ADTS is responsible for the following:

- Providing event classification input to the DSEO
- Prioritizing damage assessment and repair activities of the TSC and OSC
- Coordinating and directing the TSC and OSC, and providing guidance to the control room(s)
- Returning the facility to a safe configuration
- Authorizing emergency reentry into radiological areas for assessment, repair, or search and rescue
- Authorizing emergency exposure upgrades up to 25 rem TEDE for emergency workers inside the Protected Area
- Authorizing the use of Potassium Iodide (KI) for emergency workers inside the Protected Area
- Evaluation of conditions and direction of entry into Severe Action Management Guidelines with the support of the MCRO

2. TSC Shift Manager (TSCSM)

The TSCSM reports to the ADTS in the TSC. The TSCSM is responsible for:

- Maintaining communications with the Control Room.
- Monitoring EAL tables and providing classification and barrier status recommendations to ADTS
- Monitoring Control Room progress in Emergency Operating Procedures (EOPs)
- Providing support to TSC personnel for determining success paths.

3. Manager of Radiological Consequence Assessment (MRCA)

The MRCA reports to the ADTS in the TSC. The MRCA is responsible for:

- Providing radiological guidance and support for site evacuation and emergency teams
- Coordinating on-site radiological surveys and assessment
- Informing the ADTS of abnormal or transient on-site radiation levels and conditions and recommending PPADs to the ADTS
- Advising the ADTS regarding authorizing exposure limit increase for emergency workers
- Providing recommendations to the ADTS for issuance of Potassium Iodide (KI) to emergency workers on-site

Attachment 2 Responsibilities

(Sheet 2 of 3)

4. Radiological Monitoring Team #2 (RMT #2)

RMT #2 reports to the MRCA in the TSC. Responsible for providing evacuee monitoring at the NAP and SAP, and performing on-site surveys, collecting radiological samples or providing HP support as assigned.

5. Manager of Technical Support Center (MTSC)

The MTSC reports to the ADTS. The MTSC is responsible for the following:

- Analyzing plant conditions and status
- Providing critical plant parameter information to the ADTS
- Resolving existing and potential engineering and technical problems to mitigate the consequences of the event
- Determining emergency event cause and corrective actions
- Developing action plans to mitigate emergency conditions
- Supervising the Accident Management Team (AMT) in performing analysis of plant conditions and corrective actions
- Providing technical support to the ADTS, MCRO, and MOSC
- Developing procedures or 10 CFR 50.54(x) deviations for approval
- Coordinating activities with the unaffected units

6. Technical Support Center Reactor Engineer (TSCRE)

The TSC Reactor Engineer reports to the MTSC. The TSC Reactor Engineer is responsible for reactivity management guidance and assistance of the AMT with thermal hydraulic calculations.

7. Technical Support Center Electrical Engineer (TSCEE)

The TSC Electrical Engineer reports to the MTSC. The TSC Electrical Engineer is responsible for providing the MTSC with electrical engineering and general support.

8. Technical Support Center Mechanical Engineer (TSCME)

The TSC Mechanical Engineer reports to the MTSC. The TSC Mechanical Engineer is responsible for providing the MTSC mechanical engineering and general support.

Attachment 2 Responsibilities

(Sheet 3 of 3)

9. Accident Management Team Leader and Thermal-Hydraulics Engineer

The AMTL reports to the MTSC. The AMT members report to the AMTL. The AMT is responsible for analyzing thermal hydraulic response of the plant and assisting the MTSC in developing accident response strategies, including severe accident management efforts.

10. Manager of Security (MOS)

The MOS reports to the ADTS in the TSC. The MOS is responsible for the following:

- Station security and access control
- Personnel accountability
- Precautionary dismissal
- Personnel evacuation and assembly
- Security escorts

The MOS also provides security support for the following, as needed:

- Emergency operations
- Search and rescue teams
- Reentry and recovery operations

11. Radiological Communicator (RADCOM)

The RADCOM reports to the MRCA and is responsible for:

- Communicating with on-site RMTs
- Updating status boards
- Providing necessary assistance to the ARPS
- CO₂ monitoring