

COMANCHE PEAK STEAM ELECTRIC STATION

EMERGENCY PLAN MANUAL

RE-ENTRY, RECOVERY AND CLOSEOUT

PROCEDURE NO. EPP-121

REVISION NO. 9

EFFECTIVE DATE: 11-30-04

ELECTRONIC CONTROLLED COPY

CHANGES ARE NOT INDICATED

LATEST CHANGE NOTICE EFFECTIVE DATE _____

_____/____/____ DMS CROSS VERIFICATION PERFORMED - "WORKING COPY"

INITIAL & DATE

PREPARED BY: (Print): Chuck Cotton EXT: 6470

TECHNICAL REVIEW BY (Print) Kelly Faver EXT: 5628

APPROVED BY: D.M. Bozeman DATE: 11-24-2004

EMERGENCY PLANNING MANAGER

CPSES EMERGENCY PLAN MANUAL		PROCEDURE NO. EPP-121
RE-ENTRY, RECOVERY AND CLOSEOUT	REVISION NO. 9	PAGE 2 OF 9

1.0 PURPOSE

This procedure identifies when the CPSES Recovery Organization shall be established, describes its establishment, and describes its closeout. [C-05044]

Additionally, this procedure identifies:

- Criteria to be met for reentry to previously evacuated radiological areas BEFORE establishment of the Recovery Organization and
- Criteria to be met for transition to the Recovery Organization from each Emergency Classification (Notification of Unusual Event, Alert, Site Area Emergency, or General Emergency).
- Criteria to be met for Closeout of the Recovery Organization.
- Operations, Technical, and Corporate Support responsibilities during Recovery Organization activities, and
- CPSES ERO Positions selected as Recovery Organization members and their responsibilities.

2.0 APPLICABILITY

2.1 The Emergency Coordinator shall remain in charge of all emergency response activities until relieved by the Recovery Manager. The Recovery Manager shall be a senior CPSES management member. [C-05761]

2.2 The INTIAL Recovery Organization should include the following CPSES ERO positions:

- Emergency Coordinator (Recovery Manager)
- EOF Radiation Protection Coordinator
- TSC Onsite Radiological Assessment Coordinator
- OCS Radiation Protection Coordinator
- TSC or EOF Communications Coordinator

2.3 CPSES ERO members should NOT be dismissed until the initial Recovery Organization has been staffed and approval for their dismissal has been given by the Recovery Manager.

CPSES EMERGENCY PLAN MANUAL		PROCEDURE NO. EPP-121
RE-ENTRY, RECOVERY AND CLOSEOUT	REVISION NO. 9	PAGE 3 OF 9
<p>3.0 <u>DEFINITIONS</u></p> <p>3.1 <u>Emergency Termination</u> – an exit from an emergency classification and return to a normal plant operating mode or plant shutdown or transition to the Recovery Organization.</p> <p>3.2 <u>Recovery</u> – post emergency activities initiated to restore the affected unit(s) to normal plant operating mode or to plant shutdown.</p> <p>3.3 <u>Recovery Organization</u> – an organization formed, when a significantly large recovery effort is deemed necessary, from existing CPSES Emergency Response Organization (ERO) members and augmented, as necessary, by the Recovery Manager, with onsite and offsite TXU employees, contractors, consultants, construction personnel, security, and any other selected by the Recovery Manager. [C-05796]</p> <p>3.4 <u>Recovery Organization Closeout</u> – exit from the Recovery Organization and return to a normal plant operating mode or plant shutdown.</p> <p>3.5 <u>Reentry</u> – entry into areas previously evacuated for radiological reasons.</p> <p>4.0 <u>INSTRUCTIONS</u></p> <p>4.1 <u>PRECAUTIONS</u></p> <p>4.1.1 Closeout of the Recovery Organization requires that offsite authorities be provided a verbal and written follow-up in accordance with STA-501, “Non-Routine Reporting”</p> <p>4.1.2 Emergency Workers’ radiological exposure shall not exceed the limits specified in Title 10, Code of Federal Regulations, Part 20 unless planned for and approved as prescribed by EPP-305, “Emergency Exposure Guidelines and Personnel Dosimetry”. All efforts shall be made to keep radiological exposure of Emergency Workers As Low As Reasonably Achievable (ALARA). [C-05763]</p> <p>4.1.3 Emergency Work Permits shall be used, as prescribed in EPP-116, “Emergency Repair and Damage Control and Immediate Entries”, for conduct of Emergency Worker briefings.</p> <p>4.1.4 The Emergency Coordinator or Recovery Manager shall authorize all initial reentries into areas previously evacuated for radiological reasons. {C-05763}</p> <p>4.1.5 The Emergency Coordinator or Recovery Manager are the only TXU personnel authorized to request assistance from the Department of Energy (DOE).</p>		

<p style="text-align: center;">CPSES EMERGENCY PLAN MANUAL</p>		<p style="text-align: center;">PROCEDURE NO. EPP-121</p>
<p style="text-align: center;">RE-ENTRY, RECOVERY AND CLOSEOUT</p>	<p style="text-align: center;">REVISION NO. 9</p>	<p style="text-align: center;">PAGE 4 OF 9</p>
<p>4.2 <u>RESPONSIBILITIES</u></p> <p>4.2.1 <u>Operations Support [C-05766]</u></p> <ul style="list-style-type: none"> • Provide direct support to Shift Operations. • Analyze instrument and control problems and develop modification and repair plans. • Analyze conditions and develop guidance for Shift Operations personnel regarding core protection. • Develop out-of-normal and emergency procedures for operations support. <p>4.2.2 <u>Technical Support [C-05767]</u></p> <ul style="list-style-type: none"> • Determine need for and provide engineering and technical specialists in support of other managers as required. • Assures design activities are adequately staffed and equipped to provide timely support. • Provides direct interface between CPSES personnel and others on administrative matters. • Directs, coordinates, and approves all engineering and design activities conducted onsite during recovery. • Develops any required modifications for Radwaste systems in support of recovery. • Provides expertise for Station repair and modification activities in support of the resolution of mechanical and electrical problems. • Provides qualified personnel to augment emergency repair and damage control teams. <p>4.2.3 <u>Corporate Security</u></p> <p>TXU resources and personnel are available upon request by the Recovery Manager.</p>		

<p style="text-align: center;">CPSES EMERGENCY PLAN MANUAL</p>		<p style="text-align: center;">PROCEDURE NO. EPP-121</p>
<p style="text-align: center;">RE-ENTRY, RECOVERY AND CLOSEOUT</p>	<p style="text-align: center;">REVISION NO. 9</p>	<p style="text-align: center;">PAGE 5 OF 9</p>
<p>4.2.4 <u>Emergency Coordinator / Recovery Manager</u></p> <p>Duties and responsibilities of the Emergency Coordinator and Recovery Manager are given in EPP-109, “Duties and Responsibilities of the Emergency Coordinator / Recovery Manager.”</p> <p>4.2.5 <u>EOF Radiation Protection Coordinator</u></p> <ul style="list-style-type: none"> • Develops plans and procedures for sampling contaminated solids, liquids and gases to determine the volume and estimated curie content of various systems. • Develops plans and procedures to process and control liquid, gaseous, and solid wastes to include ensuring that logistical support is provided in the form of equipment, casks and liners, transport vehicles, resin, temporary shielding and manpower. • Develops modifications and design concepts for waste processing. • Supports offsite programs for sampling or dose assessment, dose management and radiation protection, and • Provides As Low As Reasonably Achievable (ALARA) pre-job planning and contingency plans for potential problems such as spills, high airborne and contamination. <p>4.2.6 <u>TSC Onsite Radiological Assessment Coordinator</u></p> <ul style="list-style-type: none"> • Prescribes appropriate personnel protective measures and dosimetry for reentry personnel to ensure radiological exposure remains As Low As Reasonably Achievable (ALARA). • Ensures Emergency Worker exposure remains less than 10 CFR 20 limits unless exposure above these limits have been approved by the Emergency Coordinator or Recovery Manager. (Form EPP-305-2, Emergency Exposure Authorization should be used to determine, assign, and document allowable radiological exposures for Emergency Workers). <p>4.2.7 <u>OSC Radiation Protection Coordinator</u></p> <ul style="list-style-type: none"> • Conducts pre-job briefings for Emergency Workers who are reentering areas previously evacuated for radiological reasons. • Communicates current radiological conditions and respective protective measures to Reentry Team members and keeps them up to date on plant evolutions or actions that could affect radiological conditions in their work 		

CPSES EMERGENCY PLAN MANUAL		PROCEDURE NO. EPP-121
RE-ENTRY, RECOVERY AND CLOSEOUT	REVISION NO. 9	PAGE 6 OF 9

areas to ensure their radiological exposure remains As Low As Reasonably Achievable (ALARA).

- Ensures that the TSC Onsite Radiological Assessment Coordinator and the EOF Radiation Protection Coordinator are kept informed of current radiological conditions onsite and in the plant.

4.2.8 TSC or EOF Communications Coordinator

- Notifies local agencies, State and NRC of intent to transition from an emergency classification to the Recovery Organization or to Closeout the emergency. [C-05762]

IF the Emergency Coordinator
is in the _____.

THEN this notification is
is made by _____.

TSC

TSC Communications Coordinator

EOF

EOF Communications Coordinator

4.3 ESTABLISHING THE RECOVERY ORGANIZATION

4.3.1 The following should be accomplished before establishing the Recovery Organization:

- Determine the extent of damage to plant equipment
- Radiological surveys to identify gross radiological hazards and problems.
- Isolate and/or remove components or systems that significantly contribute to personnel radiation exposure.
- Install temporary shielding, temporary barriers, and warning signs.
- Decontaminate frequently used routes and areas.
- Apply clearance tags.

4.3.2 Emergency Termination and Transition to the Recovery Organization

The Emergency Coordinator, in concert with other TXU members, shall decide whether the emergency classification should be terminated without transition to the Recovery Organization using the following guidance:

<p style="text-align: center;">CPSES EMERGENCY PLAN MANUAL</p>		<p style="text-align: center;">PROCEDURE NO. EPP-121</p>
<p style="text-align: center;">RE-ENTRY, RECOVERY AND CLOSEOUT</p>	<p style="text-align: center;">REVISION NO. 9</p>	<p style="text-align: center;">PAGE 8 OF 9</p>
<div style="text-align: right; margin-right: 100px;"> <ul style="list-style-type: none"> • Shall affirm that this decision with the Plant Manager, or in his/her absence another TXU Company Officer. • Shall notify local emergency response organization, the State, and the NRC of intent to transition to the Recovery Organization. [C-05760] </div> <p>4.3.3 <u>Initial Recovery Effort</u></p> <p>The initial recovery effort shall be focused on limiting the consequences of the incident to effect maximum protection to the general public and plant personnel.</p> <p>4.3.4 <u>Initial Reentry</u></p> <p>After establishment of the Recovery Organization, initial reentry into areas previously evacuated for radiological reasons shall be approved by the Recovery Manager. Aside from activities deemed necessary by the Recovery Manager, reentry into these previously evacuated areas may be necessary to:</p> <ul style="list-style-type: none"> • Provide lifesaving or personnel injury medial aid. • Evaluate existing and potential plant conditions. • Perform emergency repair of vital plant equipment. <p>4.4 <u>CLOSEOUT OF RECOVERY ORGANIZATION</u></p> <p>Closeout of the Recovery Organization shall be based on the recommendation of the Recovery Manager and approved by the Plant Manager. Closeout may be based on a number of criteria, such as:</p> <ul style="list-style-type: none"> • Completion of all corrective actions or restoration actions, • Availability of the affected Unit(s) to resume power operation, or • Reduced need for specialized talents and resources. <p>4.5 <u>RECORD DOCUMENTATION</u></p> <p>All records generated as the result of an actual emergency shall be forwarded to the Emergency Planning Manager.</p>		

<p style="text-align: center;">CPSES EMERGENCY PLAN MANUAL</p>		<p style="text-align: center;">PROCEDURE NO. EPP-121</p>
<p style="text-align: center;">RE-ENTRY, RECOVERY AND CLOSEOUT</p>	<p style="text-align: center;">REVISION NO. 9</p>	<p style="text-align: center;">PAGE 9 OF 9</p>
<p>5.0 <u>REFERENCES</u></p> <p>5.1 Title 10, Code of Federal Regulations, Part 20</p> <p>5.2 NUREG-0654 / FEMA-REP1, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.”</p> <p>5.3 CPSES Emergency Plan, Sections 1.2.3.1, 1.2.7, and Section 11.</p> <p>5.4 EPP-109, “Duties and Responsibilities of the Emergency Coordinator / Recovery Manager”</p> <p>5.5 EPP-116, “Emergency Repair and Damage Control and Immediate Entries”</p> <p>5.6 EPP-203, “Notifications”</p> <p>5.7 EPP-204, “Activation and Operation of the Operations Support Center (OSC)”</p> <p>5.8 EPP-205, “Activation and Operation of the Emergency Operations Facility (EOF)”</p> <p>5.9 EPP-206, “Activation and Operation of the Emergency Operations Facility (EOF)”</p> <p>5.10 EPP-305, “Emergency Exposure Guidelines and Personnel Dosimetry”</p> <p>5.11 STA-501, “Non-Routine Reporting”</p> <p>6.0 <u>ATTACHMENTS/FORMS</u></p> <p>None</p>		