

NUCLEAR POWER GENERATION

INDIAN POINT STATION

STATION ADMINISTRATIVE ORDER NO. 124 REV. 13

TITLE: Reporting of -

- Anomalous Conditions
- Emergency Plan Implementation
- Change of Status of Plant Operations
- Items of Interest

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QA PROGRAM DOCUMENT

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REPORTING OF ANOMALOUS CONDITIONS, EMERGENCY PLAN IMPLEMENTATION
CHANGE OF STATUS OF PLANT OPERATIONS AND ITEMS OF INTEREST

CORPORATE POLICY

It is Con Edison's policy to develop and maintain open lines of communication for reporting any change in status or items of interest at our Indian Point Facility in a timely and comprehensive manner.

I. INTENT OF THIS STATION ADMINISTRATIVE ORDER

To define the procedure for reporting anomalous conditions, emergency plan implementation, change of status of plant operations and items of interest that have occurred at or nearby the site to other Company organizations, the public, the governments and the USNRC.

II. ANOMALOUS CONDITIONS

An event not reportable under the Emergency Plan which results in the plant being in an unexpected condition, a condition that may affect the well-being of plant personnel, a condition that may affect plant security or may be contrary to Technical Specifications. Appendix A contains definitions of these events, and they must be reported to the USNRC on the "Hot Line" Telephone (The Emergency Notification System - ENS phone) within one (1) hour of their identification.

A. Action Required - Verbal Reporting

1. After the identification of any Anomalous Condition, the Senior Watch Supervisor (SWS) shall promptly investigate it, verify compliance with applicable Technical Specification requirements, and take appropriate action as specified.
2. The Senior Watch Supervisor shall notify the USNRC using the "Hot Line" telephone (the Emergency Notification System - ENS) within one (1) hour. If time permits the Senior Watch Supervisor should consult with the Chief Operations Engineer, General Manager-Nuclear Power Generation, or one of their designated alternates before calling the USNRC.

NOTE: In any case, the SWS shall inform one of these NPG individuals as soon as practicable or, if one of these cannot be contacted during off hours, including weekends and holidays, he shall inform the Emergency Duty Person.

NOTE: For events described in Appendix A, item 11, the SWS shall notify the General Manager, Environmental Health and Safety as soon as practicable, or if the General Manager, Environmental Health and Safety cannot be contacted during off hours, the SWS shall inform the Emergency Duty Person.

NOTE: If unable to report a significant event over the ENS network, use the hierarchy of telephone numbers given in items 2 through 5 in Appendix G to contact the NRC. If still unable to contact the USNRC Operations Center, notify them by relayed message (with verification of message receipt if possible). The USNRC Resident Inspector should be contacted promptly for any additional guidance and assistance the site may need.

The above notification will include a description of the event including date, time, cause (if known), corrective action in progress, etc. Appendix E provides detailed guidance as to what USNRC will expect in terms of information on ENS phone calls. USNRC indicated the list is not necessarily all inclusive nor are all sections applicable to each event. It is for guidance for both Con Edison and the USNRC in maintaining complete data flow.

Appendix F provides detailed guidance as to what New York State will expect in terms of information when initially notified in accordance with Section II.A.4 below.

3. The Senior Watch Supervisor will then notify the Emergency Duty Person and provide the same information as given to the USNRC.
4. The Emergency Duty Person shall advise the Senior Watch Supervisor to proceed with the following notifications (notification numbers are shown in Appendix B) and determine for events described in Appendix A, item 11, if the General Manager, Environmental Health and Safety was notified.
 - The US Nuclear Regulatory Commission Resident Inspector
 - Warning Points for the Counties of Westchester, Rockland, Orange and Putnam
 - New York State Warning Point
 - Con Edison Operations Control Center
 - Con Edison - Central Information Group (CIG)
5. The Emergency Duty Person shall notify the Vice-President - Nuclear Power and the Public Information Duty Person. For events described in Appendix A, item 11, the Emergency Duty Person shall notify the General Manager, Environmental Health and Safety whenever the General Manager, Environmental Health and Safety could not be contacted by the Senior Watch Supervisor. The Emergency Duty Person will provide the Public Information Duty Person with the names of company personnel who can provide additional technical input if required.

6. Corporate Public Affairs will, if appropriate, notify the following:
 - The media
 - Government officials and agencies (other than the four (4) county warning points and the New York State warning point).
 - Company executives
7. If Public Affairs determines that the event requires frequent reporting, a communications coordinator will be assigned to the Indian Point site to facilitate communications.

B. Action Required - Written Reporting

Significant Occurrence Report (SOR)

1. A Significant Occurrence Report (Appendix C) shall be prepared by the SWS to document each Anomalous Condition and for any other event that the SWS deems that additional review may be required. This Report (SOR) should be assigned a discrete identifier, e.g., "SOR-81-1". This identifier should be placed in the margin of the Senior Watch Supervisor log next to the entry noting the condition as well as on the Significant Occurrence Report. The number 81 in the example denotes the year 1981 and the number 1 is the sequential number of the Significant Occurrence for the calendar year.
2. After SOR form completion, the Senior Watch Supervisor shall forward the SOR to the Chief Operations Engineer (COE). The COE shall distribute copies to the Vice President - Nuclear Power (yellow), the General Manager - Nuclear Power Generation (blue), the Chief Technical Engineer (green) and file the pink copy. The COE or his designee shall investigate each SOR, evaluate any prior action, and document his recommendation (if any) for additional corrective measures on the SOR or on an attachment.

3. After reviewing, the COE will forward the remaining copy to the Chief Technical Engineer (CTE) for final review concerning corrective measures and reportability to N.R.C. Following the review, the CTE will distribute copies of the completed SOR to the Vice President Nuclear Power, the General Manager - Nuclear Power Generation, and the Director - Regulatory Affairs (DRA). The completed white copy will then be returned to the COE for filing as the station's official copy.
4. The COE shall maintain a file of completed SORs. This will be the station's official copy. All others are unofficial and for information only.
5. The CTE will send the Nuclear Training Director a copy of each completed Significant Occurrence Report for review and inclusion in operator and other plant personnel retraining programs as appropriate.
6. Draft Licensee Event Reports to the NRC shall be prepared by the Chief Technical Engineer. The CTE shall maintain a file of completed LERs.
7. For each prompt (24 hours) notification to USNRC, Regulatory Affairs should also notify the Nuclear Facilities Safety Committee Chairman (or Vice Chairman) as soon as practicable.
8. The COE or his alternate shall notify the Director, Regulatory Affairs or his alternate upon identification of a Reportable Environmental Occurrence. The DRA or his alternate shall then notify the USNRC as appropriate.

C. Other Reporting - Action Required

1. Minor accidents or events (other than Anomalous Conditions that must be reported) may occur that should be brought to the attention of the USNRC Resident Inspector. (See Section III of this SAO). After the Senior Watch Supervisor investigates such an event, he shall notify the Chief Operations Engineer, General Manager-Nuclear Power Generation, or one of their designated alternates; this individual notified shall then, as he deems warranted, notify the Director, Regulatory Affairs who will notify the USNRC Resident Inspector and decide what other reporting is appropriate.

III. CHANGE OF STATUS OF PLANT OPERATIONS AND ITEMS OF INTEREST

These are items other than Anomalous Conditions or Emergency Plan implementation for which reporting is considered necessary to meet Corporate Policy on communications about Indian Point Station. Appendix D of this SAO contains examples of these change of status and items of interest.

A. Action Required - Verbal Reporting

1. After the identification of any of these change of status of plant operations or items of interest, the Senior Watch Supervisor shall promptly investigate the event, verify compliance with appropriate procedures and take appropriate action as specified.
2. The Senior Watch Supervisor will notify the Emergency Duty Person. The notification will include a description of the event including date, time, cause (if known), and analysis (if known), and corrective action in process.
3. The Emergency Duty Person shall verify that the event fits the definitions in Corporate Policy using Appendix D for guidance and will advise the Senior Watch Supervisor to proceed with the following notifications. (Notification numbers are shown in Appendix B.).
 - The US Nuclear Regulatory Commission Resident Inspector and US Nuclear Regulatory Commission Headquarters if directed to by the Resident Inspector.
 - Warning Points for the Counties of Westchester, Rockland, Orange and Putnam.
 - New York State Warning Point
 - Con Edison Operations Control Center
 - Con Edison - Central Information Group (CIG)
4. Any service water system leaks within containment will be reported to the NRC by telephone within 24 hours.

5. The Emergency Duty Person shall notify the Vice-President - Nuclear Power, Director, Regulatory Affairs and the Public Information Duty Person. The Emergency Duty Person will provide the Public Information Duty Person with the names of company personnel who can provide additional technical input if required.
6. Corporate Public Affairs will, if appropriate, notify the following:
 - The media
 - Government officials and agencies (other than the four (4) county warning points and the New York State warning point).
 - Company executives
7. If Public Affairs determines that the event requires frequent reporting, a communications coordinator will be assigned to the Indian Point site to facilitate communications.

B. Action Required - Written Reporting

In the event of any service water system leak within containment, a special licensee event report will be submitted to the NRC within 14 days.

When a leak is detected in a service water system component that, based on existing plant status, is not a requirement of a limiting condition of operation as defined in the facility Technical Specifications, a special licensee event report is not required.

Written reports are not required for Items of Interest or Change of Status of Plant Operations other than service water system leaks within containment.

IV. EMERGENCY PLAN IMPLEMENTATION

The initiating conditions for any of the four (4) emergency plan classifications (NUE, ALERT, SITE AREA and GENERAL) are contained in the Emergency Procedures Document, copies of which are located in the Control Room and the Senior Watch Supervisor's office.

A. Action Required - Verbal Reporting

1. The Senior Watch Supervisor shall promptly investigate the event to determine whether it is classified in one of the four (4) Emergency Plan categories (NUE, ALERT, SITE AREA or GENERAL). The initiating conditions are listed for each category in the Emergency Procedures Document (EPD). After this determination is made the following appropriate action shall be taken.
2. The Senior Watch Supervisor or Senior Reactor Operator shall declare the emergency and perform the notification as indicated in the EPD under the appropriate Watch Supervisor tab and the indicated Implementation Procedure IP-1002.

B. Action Required - Written Reporting

1. For all four (4) emergency plan classifications (NUE, ALERT, SITE AREA & GENERAL) there is a requirement for a written summary to be sent to off-site authorities when there is a closeout or reduction of an emergency. The requirements and direction are given in Implementation Procedure IP-1029 located in the EPD.

The responsibility for completing the form and sending it to the General Manager, NPG for each emergency classification is as follows:

NUE	- Senior Watch Supervisor
ALERT	- Emergency Director
SITE AREA	- Emergency Director
GENERAL	- Emergency Director

V. REPORTS REQUIRED

1. Significant Occurrence Report (SOR) for each Anomalous Condition.
2. Emergency Plan Reports as defined in IP-1029.

VI. SUPERSESSSION/CANCELLATION

Revision 13 cancels SAO-124, Rev. 12 dated June 8, 1982. This revision incorporates changes in report forms and the routing of reports.

APPENDIX AANOMALOUS CONDITIONS

NRC shall be notified of any of the following except as noted in Item 7. For items 1-4, an open, continuous communication channel shall be maintained, to be closed only when notified by USNRC.

1. The exceeding of any Technical Specification Safety Limit.
2. Any event that results in the nuclear power plant not being in a controlled or expected condition while operating or shut down.
3. Any act that threatens the safety of the nuclear power plant or site personnel, or the security of special nuclear material, including instances of sabotage or attempted sabotage.
4. Any event requiring initiation of the Site Emergency Plan or any section of that Plan.
5. Any event requiring initiation of shutdown of the nuclear power plant in accordance with Technical Specification Limiting Conditions for Operation.
6. Personnel error or procedural inadequacy which, during normal operations, anticipated operational occurrences, or accident conditions, prevents or could prevent, by itself, the fulfillment of the safety function of those structures, systems, and components important to safety that are needed to (i) shut down the reactor safely and maintain it in a safe shutdown condition, or (ii) remove residual heat following reactor shutdown, or (iii) limit the release of radioactive material to acceptable levels or reduce the potential for such release.
7. Any event resulting in manual or automatic actuation of Engineered Safety Features, including the Reactor Protection System. Exception: When this actuation results from and is part of the planned sequence during surveillance testing.
8. Any accidental, unplanned, or uncontrolled radioactive release. (Normal or expected releases from maintenance or other operational activities are not included.)
9. Any fatality or serious injury occurring on the site and requiring transport to an offsite medical facility for treatment.
10. Any serious personnel radioactive contamination requiring extensive onsite decontamination or outside assistance.

(Appendix A continued on next page)

11. Any event meeting the criteria of 10CFR20.403 for notification. (Any incident involving licensed material possessed by Con Edison and which may have caused or threatens to cause:
 - (1) Exposure of the whole body of any individual to 5 rems or more of radiation; exposure of the skin of the whole body of any individual to 30 rems or more of radiation; or exposure of the feet, ankles, hands, or forearms to 75 rems or more of radiation; or
 - (2) The release of radioactive material in concentrations which, if averaged over a period of 24 hours, would exceed 500 times the limits specified for such materials in Appendix B, Table II of 10CFR20; or
 - (3) A loss of one day or more of the operation of any facilities affected; or
 - (4) Damage to property in excess of \$2,000.)
12. Strikes of operating employees or security guards, or honoring of picket lines by these employees.
13. ENS Extensions Inoperable - Within an hour of the time that one or more Indian Point Unit 2 telephone extensions of the Emergency Notification System are found to be inoperable for any reason, call (202) 951-0550 or (301) 492-7000.

NOTE: If unable to report a significant event over the ENS network, use the hierarchy of telephone numbers given in items 2 through 5 in Appendix G to notify the NRC. If still unable to contact the NRC Operations Center, notify them by relayed message (with verification of message receipt if possible). The USNRC Resident Inspector should be contacted promptly for any additional guidance and assistance the site may need.

References: 10CFR 20.403
10CFR 50.72

APPENDIX B

NOTIFICATION TELEPHONE NUMBERS

- Vice President-Nuclear Power.....
- Con Edison Public Information.....
- Con Edison Public Information-Off Hrs...
- Con Edison Operations Control.....
- Con Edison Central Information Group...
- Westchester Co. Warning Point.....
- Rockland Co. Warning Point.....
- Putnam Co. Warning Point.....
- Orange Co. Warning Point.....
- New York State Warning Point.....
- NRC "Hot Line" (ENS).....
(NRC Operations Center)
- NRC Resident Inspectors.....

Proprietary

Information

Proprietary Information

Appendix C

SIGNIFICANT OCCURENCE REPORT		S.O.R. No.	
		DATE OF OCCURENCE:	
UNIT 2	SUPPORT FACILITY	TIME OF IDENTIFICATION:	
CONDITIONS PERTINENT TO OCCURENCE:			
REACTOR POWER	ELEC. OUTPUT:	CONTROLLING BANK POSITION:	PRESSURIZED LEVEL:
RCS TEMP.	RCS PRESS:	OTHER PERTINENT CONDITIONS:	
CHECK ONE:	CAUSED BY:		
TRIP			
LOAD REDUCTION	# OF MW REDUCTION:	CAUSED BY:	
EQUIPMENT FAILURE	EQUIPMENT NAME & NO.:		
TEST FAILURE	TEST TITLE & NO.:		
INSTRUMENT FAILURE	INSTRUMENT NAME & NO.:		
OTHER			
METHOD OF DETECTION:			
DESCRIPTION OF OCCURENCES:			
CAUSE OF OCCURENCES:			
ACTION TAKEN TO CORRECT OCCURENCE:			
NOTIFICATION (CHECK AS APPLICABLE)			
1 HOUR NRC HOTLINE NOTIFICATION PERFORMED _____			
NOTIFICATION MADE TO: NRC RESIDENT _____		COUNTY WARNING PT _____	
NYS WARN. PT _____		OCC. _____ CIG _____	
V.P. — N.P. _____		PUBLIC INFO _____ C.O.E. _____	
REPORTABLE OCCURENCES (CHECK AS APPLICABLE)			
24 HR. NOTIFICATION, 14 DAY WRITTEN _____, 30 DAY WRITTEN _____			
PROMPT ENVIRONMENTAL (24 HR. NOTIFICATION, 10 DAY WRITTEN) _____			
30 DAY WRITTEN ENVIR. _____, OTHER (SPECIFY) _____			
REVIEW			
SWS	DATE	COE	DATE
LER NO. _____	FORWARDED FOR SNSC REVIEW _____		
PART 21 REPORTABLE	, NO _____, NUCLEAR ENGR. REVIEW RQD. _____		
COMMENTS:			
R. E.	DATE	C.T.E.	DATE

APPENDIX DCHANGE OF STATUS OF PLANT OPERATIONS

Unscheduled shutdowns

Scheduled shutdowns for testing, maintenance or refueling

Deratings caused by regulatory actions

Deratings of 50% or more

Unusual movement of equipment or personnel (which may affect Buchanan or Westchester traffic) as a result of onsite needs

Leaks in the reactor coolant or gas decay systems

Feedwater, main steam or excessive water leaks in the containment building

Any incident affecting containment building integrity

Fire or explosions in the plant or nearby

Turbine or reactor trips

Steam generator tube leaks

Incidents involving radioactive waste material processing (onsite or offsite if involved with Con Edison shipments)

ITEMS OF INTEREST

All offsite seismic events, actual or claimed, that come to Con Edison's attention

Damage to any building or structure on the site from natural phenomena

Civil disturbances, strikes or picketing at the site

Reportable environmental analysis

Bomb threats

Personnel incidents that involve physical actions or threats that forceably require people to be removed from the site by civil authorities or company authorities

On-site arrests by police authorities

Any summoning of emergency equipment (fire trucks, ambulances, etc.), to the site

ENS extension inoperable

APPENDIX E
CHECKLIST FOR NOTIFICATION OF SIGNIFICANT EVENTS
MADE IN ACCORDANCE WITH 10 CFR 50.72

A. Identification:

Date _____ Time _____ Name of Person Making Report _____

Licensee _____ Facility Affected _____

Applicable Part of 10 CFR 50.72 _____

B. Description:

Date of Event _____ Time _____

Description of What Happened _____

C. Consequences of Event: (Complete depending on type of event)

Injuries _____ Fatalities _____

Contamination (personnel) _____ (property) _____

Overexposures (known/possible) _____

Safety Hazard (describe - actual/potential) _____

Offsite Radiation Levels _____

Integrated Dose _____ Location _____

Meteorology (wind speed) _____ From (direction) _____

Weather Conditions (rain, clear, overcast, temperature) _____

Equipment/Property Damage _____

D. Cause of Event: _____

E. Licensee Actions:

Taken _____

Planned _____

Emergency Plan Activated (Yes/No) _____ Classification of Emergency 1 _____

Resident Inspector Notified (Yes/No) _____ State Notified (Yes/No) _____

Press Release Planned (Yes/No) _____ News Media Interest (Yes/No) _____
Local/National _____

F. Current Status: (Complete depending on type of event)

1. Reactor Systems Status _____

Power Level Before Event _____ After Event _____

Pressure _____ Temp. (t_{hot}) _____ (t_{cold}) _____

RCS Flow (Yes/No) _____ Pumps On (Yes/No) _____

Heat Sink: Condenser _____ Steam Atm. Dump _____

Other _____ Sample Taken (Yes/No) _____ Activity Level _____

ECCS Operating (Yes/No) _____ ECCS Operable (Yes/No) _____

ESF Actuation (Yes/No) _____

PZR or RX Level _____ Possible Fuel Damage (Yes/No) _____

S/G Levels _____ Feedwater Source/Flow _____

Containment Pressure _____ Safety Relief Valve Actuation (Yes/No) _____

Containment Water Level Indication _____

Equipment Failures _____

Normal Offsite Power Available (Yes/No) _____

Major Busses/Loads Lost _____

Safeguards Busses Power Source _____

D/G Running (Yes/No) _____ Loaded (Yes/No) _____

1 See Emergency Action Levels, Appendix 1, NUREG-0654, Revision 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.

2. Radioactivity Release

Liquid/Gas _____ Location/Source _____

Release Rate _____ Duration _____

Stopped (Yes/No) _____ Release Monitored (Yes/No) _____

Amount of Release _____ Tech Spec. Limits _____

Radiation Levels in Plant _____ Areas Evacuated _____

3. Security/Safeguards 2

Bomb Threat: Search Conducted (Yes/No) _____ Search Results _____

Site Evacuated (Yes/No) _____

Intrusion: Insider _____ Outsider _____

Point of Intrusion _____ Extent of Intrusion _____

Apparent Purpose _____

Strike/Demonstrations: Size of Group _____

Purpose _____

Sabotage: Radiological (Yes/No) _____ Arson (Yes/No) _____

Equipment/Property _____

Extortion: Source (phone, letter, etc.) _____

Location of Letter _____

Demands _____

General: Firearms involved (Yes/No) _____ Violence (Yes/No) _____

Control of Facility Compromised or Threatened (Yes/No) _____

Stolen/Missing Material _____

Agencies Notified (FBI, State Police, Local Police, etc.) _____

Media Interest (present, anticipated) _____

See 1 CFR 73.71(c), effective April 6, 1981.

Date & Time of Message _____

INITIAL NOTIFICATION FACT SHEET

1. NUCLEAR FACILITY PROVIDING THE INITIAL REPORT:

- (A) Indian Point Unit 2
- (B) Indian Point Unit 3
- (C) Ginna Station
- (D) Nine Mile Point Unit 1
- (E) Fitzpatrick Plant
- (F) Other _____

2. This (A) is (B) is not AN EXERCISE.

3. EMERGENCY CLASSIFICATION:

- (A) Unusual Event
- (B) Alert
- (C) Site Area Emergency
- (D) General Emergency
- (E) Transportation Incident
- (F) Other (Describe) _____

Message: _____

4. REPORTED BY (A) _____ (B) _____
Name Title

5. THERE (A) has (B) has not BEEN A RELEASE OF RADIOACTIVITY TO THE
 (C) atmosphere (D) ground (spill only) (E) body of water _____

6. THE RELEASE (A) is continuing (B) has terminated (C) not applicable.

7. NEED FOR PROTECTIVE ACTION:

- (A) For information Only. There is no need for protective actions outside the Site Boundary.
- (B) There is need for Protective Action. (If applicable, affected areas include sectors or ERPAs) _____

8. RECOMMENDED PROTECTIVE ACTIONS:

- (A) Not Applicable
- (B) Shelter within _____ miles information) _____
- (C) Evacuation within _____ miles
- (D) Other (or for additional _____)

9. (A) WIND SPEED _____ miles per hour or _____ meters per second, and

(B) DIRECTION (from) _____ degrees.

(C) GENERAL WEATHER CONDITIONS (sunny, rainy, etc.) _____

(D) STABILITY CLASS (A-G) _____

10. MEANS OF COMMUNICATION CONTACT, VERIFICATION AND/OR ADDITIONAL INFORMATION IF DIFFERENT FROM PRE-ARRANGED COMMUNICATIONS CHANNELS.

APPENDIX GEMERGENCY TELEPHONE NUMBERS FOR NRC NOTIFICATION

<u>TELEPHONE SYSTEM</u>	<u>TELEPHONE NUMBER</u>
1. Emergency Notification System to NRC Operations Center	
2. Commercial Telephone System to NRC Operations Center (via Bethesda Central Office)	Proprietary
3. Commercial Telephone System to NRC Operations Center (via Silver Spring Central Office)	Information
4. Health Physics Network to NRC Operations Center	
5. Commercial Telephone System to NRC Operator (via Bethesda Central Office)	