Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914 736.8001

NewYorkPower Authority

L. M. Hill
Resident Manager

June 27, 1994
IPN-94-073

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop PI-137
Washington, D.C. 20555

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
Objectives for the October 1994 Emergency Preparedness Exercise

Dear Sir:

Attached are the objectives for the Indian Point 3 Partial Participation Emergency Preparedness Exercise scheduled to be conducted on October 5, 1994. The attached Tables 1 and 2 correlate the NUREG-0654/0737 elements to be exercised to the objectives.

The New York Power Authority intends to fully test the Site response to a simulated emergency condition at Indian Point 3. Active participation by New York State and the surrounding counties is not anticipated.

Attachment B identifies the commitment made as part of this submittal.

Should you or your staff have any questions, please feel free to contact Mary Ann Chaubard, Site Emergency Planning Coordinator, at (914) 736-8404.

Very truly yours,

L. M. Hill
Resident Manager
Indian Point 3 Nuclear Power Plant

LMH/MC

Attachments

cc: See next page

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9407010070 940627
PDR ADOCK 05000286
F PDR

cc: R. Keimig, Chief
Emergency Preparedness Section
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

U.S. Nuclear Regulatory Commission
Resident Inspectors' Office
Indian Point 3 Nuclear Power Plant

INDIAN POINT NO. 3 NUCLEAR POWER PLANT
1994 PARTIAL PARTICIPATION EXERCISE
OCTOBER 5, 1994

PURPOSE/SCOPE/OBJECTIVES

A. PURPOSE

The purpose of this exercise is to demonstrate the ability of the Indian Point 3 (IP3) Emergency Response Organization to respond to a simulated emergency at IP3. It is designed to demonstrate the capabilities of the Emergency Response Facilities including the use of the Emergency Response Plan and Procedures. It is also a vehicle through which Emergency Response Organization (ERO) personnel receive practical training in their specific emergency response responsibilities.

B. SCOPE

The scenario is designed to activate the IP3 Emergency Plan and Procedures through various action levels. Although the scenario accurately simulates operating events, it is not intended to be used to assess the operators' diagnostic capabilities but rather provides sequences which ultimately demonstrate the operators' ability to respond to events which result in exercising emergency plans and procedures. Free play is encouraged and the controllers will intercede only if operator/player action prematurely terminates the exercise or excessively deviates from the scenario timeline.

The scenario is developed and reviewed by a committee consisting of representatives from many disciplines including Emergency Planning (Site and Corporate), Training, Public Affairs, Chemistry, Technical Services, Instrumentation and Control, and Maintenance. The scenario is also run on the IP3 simulator to develop data and verify sequences and expected responses.

The exercise will be conducted during normal work hours and will last approximately four (4) hours.

Since this is a Partial Participation Exercise, participation by Orange, Putnam, Rockland, and Westchester Counties as well as New York State will be limited. Support is anticipated from Consolidated Edison (IP2) for offsite survey teams. The New York Power Authority will activate the following Emergency Response Facilities: Control Room (Simulator), Emergency Operations Facility, Operations Support Center, Technical Support Center, Joint News Center, and Emergency Recovery Center.

At no time will the exercise be permitted to interfere with the safe operation of IP3. To ensure this goal, plant management may suspend the exercise, or any part of it, for any period of time if a plant safety issue arises.

C. **OBJECTIVES**

All of the major elements that are to be included in every exercise, as outlined in NRC Inspection Procedure 82302 (3/18/94), are incorporated into the objectives for this exercise. In addition, four (4) of the elements that should be exercised over a six (6) year period are included in the objectives for this exercise. They are as follows:

1. Activation of the Joint News Center (JNC),
2. Use of licensee's headquarters support personnel,
3. Rumor control,
4. Use of back-up communications (State/County notifications).

The following objectives will be demonstrated. They were used to develop the exercise scenario and provide a framework for drill observers to evaluate exercise performance.

Emergency Response Facilities:

A. **Control Room (CCR) (Simulator)**

1.0 Facility Management and Control - The shift supervisor will coordinate and oversee control room response. Upon turnover to the Plant Operations Manager (POM), the facility management and control will be the responsibility of the POM. This will include the use of procedures.

2.0 Analysis of Plant Conditions and Corrective Actions - Control room staff will correctly interpret control room instrument displays and have the ability to recognize that events are progressing abnormally.

3.0 Detection and Classification of Emergency Events - Control room staff will classify an emergency using emergency action levels (EALs) on the basis of plant conditions.

4.0 Onsite Notifications and Communications - Control room staff will notify onsite personnel via the plant page of the following:

- emergency condition,
- emergency classification,
- plant updates approximately every 30 minutes.

Control room staff will communicate with each other and the other emergency response facilities including briefings on plant conditions.

5.0 Offsite Notifications and Communications - Control room staff will notify State/Counties via land-line phones (back-up methods). The initial notification will be made within 15 minutes of the emergency declaration and will include the emergency classification. Additional required information (NYS Radiological Data Form Part I) will be faxed following the initial notification.

The control room staff will notify ANI, INPO and the NRC via normal methods.

6.0 Implementation of Onsite Protective Actions - The control room staff will initiate and consider onsite protective actions until the EOF is activated, as required (e.g., accountability, KI issuance, evacuation of non-essential personnel, exposure authorization, etc.).

7.0 Dose Assessment - Personnel will use approved procedures for dose assessment including meteorological information.

B. **Technical Support Center (TSC)**

1.0 Staffing and Activation of the TSC - The TSC will be staffed within 60 minutes of the Alert or higher classification. Provisions for 24 hour continuous operation of the site emergency response organization will be made through the use of a two (2) shift roster.

2.0 Facility Management and Control - The TSC Manager (TSCM) will coordinate and oversee technical support activities. This will include the use of procedures.

3.0 Accident Assessment - Personnel activating the TSC will adequately and accurately perform the following tasks:

- initially assess and continuously reassess reactor conditions,
- maintain an overview of the reactor and plant conditions using the expertise of technical staff and information provided to them.

4.0 Communications - The TSC staff will communicate with each other and other facilities, and will be briefed on plant conditions.

5.0 Implementation of Protective Actions - Appropriate TSC staff will ensure habitability of the TSC.

6.0 Assistance and Support to the CCR - The TSCM will oversee the analysis and corrective action response. Performance of other functions should not interfere with direction or determination of corrective action. Corrective actions will be implemented in an effective and timely manner.

C. **Emergency Operations Facility (EOF):**

1.0 Staffing and Activation of the EOF - The EOF will be staffed within 60 minutes of the Alert of higher classification. Provisions for 24 hours continuous operation of the site emergency response organization will be made through the use of a two (2) shift roster.

2.0 Facility Management and Control - The Emergency Director (ED) will oversee all activities performed at the EOF. This will include the use of appropriate procedures.

3.0 Accident Assessment and Classification - Personnel activating the EOF will adequately and accurately perform the following tasks:

- use EALs, as appropriate, to confirm or reclassify an emergency,
- maintain an overview of the reactor and plant conditions using the expertise of the staff and the information provided.

4.0 Offsite Dose Assessment - If a release is anticipated or is in progress, the appropriate EOF staff will correctly assess and integrate information from the reactor system's status and trends, radiological monitoring, source term assumptions, and meteorological information (current and forecast) to define the magnitude and location of the offsite impact.

5.0 Offsite Monitoring - If a release is anticipated or in progress, offsite monitoring teams will be deployed following vehicle equipment check and a briefing. Teams will be dispatched to appropriate locations to intercept the plume and take samples (radiation measurements - gamma and beta readings and air samples). The results of monitoring will be used to redefine the source term and projected doses.

6.0 Protective Action Decision Making - The appropriate EOF staff will assess the status of the reactor core, reactor systems and containment to recommend onsite and offsite protective actions. The following will be considered in determining what protective actions are appropriate:

- current reactor and plant status,
- prognosis of accident,
- expected magnitude and duration of release,
- current and projected weather conditions.

7.0 Onsite Notifications and Communications - The EOF staff will communicate with each other, with the other facilities, and be briefed on plant conditions.

8.0 Offsite Notifications and Communications - Upon turnover from the CCR, the EOF staff will commence notifications to the State/Counties via land-line phones (back-up methods). The initial notification will be made within 15 minutes of the emergency declaration and will include the emergency classification. Additional required information (NYS Radiological Data Form Part I) will be faxed following the initial notification.

The EOF staff will notify ANI, INPO, and the NRC via normal methods.

9.0 Implementation of Protective Actions - The appropriate EOF staff will confirm and periodically assess the habitability of the EOF, as required. The appropriate EOF staff will initiate and consider onsite protective actions, as required (e.g., accountability, KI issuance, evacuation of non-essential personnel, exposure authorization, etc.).

D. **Operations Support Center (OSC):**

1.0 Staffing and Activation of the OSC - The OSC will be staffed within 60 minutes of the Alert or higher classification. Provisions for 24 hours continuous operation of the site emergency response organization will be made through the use of a two (2) shift roster.

2.0 Facility Management and Control - The OSC Manager (OSCM) will coordinate and oversee operations support activities. The OSCM will ensure the use of procedures.

3.0 Repair and Corrective Actions - Personnel performing specific repair and corrective actions will be assigned in a timely manner and with clear instructions. Teams dispatched from the OSC will be briefed, tracked, and debriefed. Procedure adherence is required unless authorization to deviate is specifically provided.

4.0 Communications - OSC staff will communicate with each other and the other facilities, and will be briefed on plant conditions. Communications with the teams dispatched from the OSC will be maintained.

E. **Emergency Response Center (ERC):**

1.0 Staffing and Activation - The staffing and activation of the ERC will be in accordance with approved procedures.

2.0 Facility Management and Control - The Recovery Manager (RM) will coordinate and oversee ERC activities and coordinate support as requested from the site.

3.0 Communications - The ERC staff will communicate frequently with each other and the other facilities, and will be briefed on plant conditions.

F. **Offsite Monitoring:**

1.0 Activation and Deployment - Vehicles will be available and readily accessible to transport the teams. Calibrated instrumentation and equipment will be available for monitoring and for taking samples. Instrumentation to detect radioiodine at levels as low as 10^{-7} µCi/cc under field conditions will be available. Teams will be equipped with a two-way communications system. They will be briefed on plant, radiological, and meteorological conditions prior to dispatch and periodically updated.

2.0 Surveys, Sampling and Analysis - Teams will be able to locate sampling/monitoring points. Teams will be knowledgeable in collecting, bagging, and marking samples, and in reading monitoring results in accordance with approved procedures. Teams will keep track of their radiological exposures. Monitoring results will be promptly and correctly reported back to the EOF.

G. **Security and Accountability:**

1.0 Security - Access control will be maintained at the site and will not interfere with the response to an emergency. Security practices and procedures will not impede movement and access of site operating and response personnel to plant areas during an emergency situation.

2.0 Accountability - Conduct of protected area accountability will be achieved in 30 minutes of the declaration of a Site Area Emergency or a General Emergency. A search and rescue team will be initiated for missing people.

H. **Joint News Center (JNC):**

1.0 Information disseminated to the media/press by the licensee will be accurate and timely. News releases will be properly coordinated with the ED.

2.0 Communication equipment will be available. Licensee personnel giving briefings will be technically qualified and able to respond to media questions accurately and quickly.

I. **Critique:**

1.0 Critique - At the end of the exercise, each facility will hold a critique with the controller and players. A formal critique will follow that evaluates the overall performance of the drill. The controllers/observers will identify areas of strengths and weaknesses.

Exercise and Drills:

This exercise incorporates the following drills:

1. Communication Drill - The IP3 staff will notify and communicate with State and local governments, and field assessment teams.

2. Health Physics/Radiological Monitoring Drill - The Health Physics staff will respond to and conduct analysis of simulated elevated radiation measurements.

NRC Required Elements to be Exercised Each Year

Inspection Procedure 82302 Item	NUREG-0654/0737 Items	Exercise Paragraphs Addressing Items
1. Accident detection and assessment	I.1[3], I.2	a.2, b.3, c.3
2. Emergency Classifications	D.1, D.2	a.3, c.3
3. Notification of onsite and offsite emergency responders	E.1, E.2, E.3, J.1	c.7 (E.2), c.8 (E.1,2,3), a.4 (J.1)
4. Communications	F.1[2], F.2[2], E.2, E.4, H.6, 8.1[1], 8.2[1], 8.3[1], 8.4[1]	a.4 (E.2, F.1.e), a.5 (F.1.b,c,f), b.4 (F.1.d), c.7 (E.2, F.1.d,e), c.8 (E.2,4, F.1.b,c,d,f), d.4 (F.1.d), f.1 (F.1.d, H.6)
5. Radiological exposure control	K.1[2], K.2, K.3, K.5, K.6, J.3, J.6	a.6 (K.1.b,c, K.2,3,5,6) c.9 (K.1.b,c, K.2, J.6)
6. Protective action recommendations	J.7	c.6
7. Staff augmentation	A.1[1], A.3, A.4, B.7[1], B.8[1], B.9[1]	a.1 (A.1.d), b.1 (A.4), b.2 (A.1.b), c.1 (A.4, B.5), c.2 (A.1.d), d.1 (A.4, B.5), d.2 (A.1.b)
8. Shift staffing	B.1[1], B.2[1], B.3[1], B.5, Table 2[1]	c.1 (B.5)

1 Indicates that all or part of this requirement is met programmatically, and therefore it is not specifically addressed by an exercise objective.

2 Indicates that all or part of this requirement is met by performing medical exercises, and therefore it is not covered by this exercise.

3 Indicates that all or part of this requirement is met by performing PASS exercises, and therefore it is not covered by this exercise.

Table 1

NRC Required Elements to be Exercised Over a Period of Six Years which are Addressed this Drill

Inspection Procedure 82302 Item	NUREG-0654/0737 Items	Exercise Paragraphs Addressing Items
2. Activation of the Joint News Center	G.3, G.4.a,b	h.1 (G.3), h.2 (G.4.a,b)
6. Use of licensee's headquarters support personnel	O.4.i	e.1
7. Use of security personnel to provide access for emergency equipment and support	O.4.d	g.1
8. Use of backup communications	F.1[1]	a.4 (F.1.e), a.5 (F.1.b,c,f), b.4 (F.1.d), c.7 (F.1.d,e), c.8 (F.1.b,c,d,f), d.4 (F.1.d), f.1 (F.1.d)

[1] Indicates that all or part of this requirement is met programmatically, and therefore it is not specifically addressed by an exercise objective.

Table 2

List of Commitments

Number	Commitment	Due
IPN-94-073-01	The Authority will conduct a partial participation emergency preparedness exercise.	October 5, 1994