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SUBJECT: Rev 4 to Corporate Plan Implementing Procedure CPIP-2.2, "Technical Support Coordination." W/910111 ltr.

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Iowa Electric Light and Power Company

January 11, 1991
NEP-91-0036

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U.S. Nuclear Regulatory Commission
Washington DC 20555

Project: Duane Arnold Energy Center
Subject: Transmittal of Emergency Planning Documents
File: A-304

To Whom It May Concern:

We are forwarding, in accordance with Appendix E to 10CFR50, three controlled copies (one to NRR and two to NRC Region III) of our

| | | |
|---|---|---|
| [ ] | Duane Arnold Energy Center Emergency Plan | Revision _____ |
| [ ] | Emergency Plan Implementing Procedure | Revision _____ |
| [ ] | Iowa Electric Light & Power Co. Corporate Emergency Response Plan | Revision _____ |
| [X] | Corporate Plan Implementing Procedure 2.2 | Revision ___4___ |
| [ ] | Duane Arnold Energy Center Emergency Telephone Book The Emergency Telephone Book is considered to be proprietary to Iowa Electric. | Revision _____ |

Insert the revised document(s) in your files and discard the obsolete one(s). Please acknowledge the receipt of the enclosed documents by signing and dating the section below and returning a copy of this letter to me.



A045
1/1

|X| No proprietary information is contained in these revisions.

|__| The Emergency Telephone Book is, in total, considered to be proprietary to Iowa Electric.

Very truly yours,

Paul L. Serra
Manager, Emergency Planning

cc: IE Supervisor, Emergency Planning
IE Manager, Nuclear Licensing
IE Emergency Planner - Procedures
NRC Region III (2)
NRC Resident Inspector

The document(s) listed above have been received by the NRC.

1. Headquarters, NRR, _____, _____.
Control Copy #91 Date

2. NRC Region III, _____, _____.
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Pg 7, 6.0 - Attachments

Added Attachments 1, 2 & 3.

Pg 8, Signatures

Changed "Group Leader, Emergency Planning" to "Supervisor, Emergency Planning."

Pg 9, Attachment 1

Added new attachment "Emergency Support Manager Checklist".

Pg 10, Attachment 2

Added new attachment, "Technical and Engineering Support Supervisor Checklist."

Pg 11, Attachment 3

Added new attachment, "Engineering Information Communicator Checklist".

| CORPORATE PLAN IMPLEMENTING PROCEDURE | No. CPIP - INDEX Rev. 23<br>PAGE 1 of 1 |
|---|---|
| INDEX | EFFECTIVE DATE: SEP 14 1990 |

| DOCUMENT NUMBER | TITLE | REV. | DATE |
|---|---|---|---|
| 1.2 | Corporate Notification | 9 | 03/27/90 |
| 1.3 | Activation and Operation of the EOF | 8 | 09/12/90 |
| 1.4 | Release of Emergency-Related Information | 6 | 09/14/90 |
| 1.5 | Building Security Implementation | 5 | 07/25/90 |
| 1.6 | Communication and Data Transmission Systems Coordination | 2 | 07/25/90 |
| 2.1 | Dose Assessment and Protective Action Recommendations | 10 | 08/24/90 |
| 2.2 | Technical Support Coordination | 3 | 07/19/90 |
| 2.3 | Administrative Services and Corporate Response Coordination | 4 | 08/07/90 |
| 2.4 | Quality Assurance and Quality Control Activities | 2 | 10/06/89 |
| 2.5 | Insurance and Claims | 2 | 06/11/90 |
| 2.6 | Legal Assistance | 2 | 07/20/90 |
| 4.1 | Maintenance of Emergency Preparedness | 7 | 08/17/90 |
| 4.2 | Training, Drills and Exercises | 5 | 08/17/90 |
| 4.3 | Public Information Program | 4 | 07/09/90 |
| 5.1 | Emergency Response and Recovery Director | 5 | 07/19/90 |
| 5.2 | Radiological and EOF Manager | 9 | 06/27/90 |

1.0 PURPOSE

This procedure provides instructions for the performance of engineering, analysis and licensing activities conducted in the Emergency Operations Facility (EOF) during an emergency at the DAEC.

2.0 APPLICABILITY

2.1 This procedure shall be implemented upon declaration of an ALERT or greater and is applicable to Engineering, Licensing and Fuels personnel assigned to the Nuclear Generation Division. Electrical Engineering and Applications Engineering Departments in the corporate office.

2.2 Portions of this procedure may also be implemented for events of a lower classification, as directed by the Emergency Response and Recovery Director, to support engineering and evaluative activities being accomplished at the DAEC.

3.0 RESPONSIBILITIES

3.1 Emergency Support Manager

3.1.1 Ensure that engineering, licensing and fuels activities conducted in the EOF are coordinated with those being accomplished at the DAEC.

3.1.2 Assist, as required, in obtaining engineering analysis, licensing and fuels expertise from vendors and contract firms.

3.1.3 Assist, as required, in reviewing the Emergency Action Levels

3.2 Technical and Engineering Support Supervisor

3.2.1 Coordinate with the Technical and Engineering Supervisor in the TSC and identify engineering analysis and licensing support tasks which are to be accomplished in the EOF.

3.2.2 Assign engineering and related support tasks to staff personnel in the EOF and provide overall guidance and technical direction for the assigned work.

3.2.3 Obtain engineering resources available within the corporate offices, as required, to support engineering efforts being accomplished by personnel assigned to the Nuclear Generation Division.

3.2.4 Solicit assistance in the form of recommendations and guidance regarding the event and plant conditions from appropriate vendor and contract engineering firms and take action, as authorized by the Emergency Support Manager, to obtain appropriate services.

3.3 Task Group Leaders

3.3.1 Establish criteria for tasks which are identified and assign the performance of designated activities to cognizant staff personnel.

3.3.2 Provide direct supervision of activities assigned and assistance, as may be required, during their execution.

3.3.3 Evaluate, as appropriate, proposed solutions to technical problems, recommendations received from vendors, etc., and appraise the Technical and Engineering Support Supervisor of the results.

4.0 INSTRUCTIONS

4.1 Notification and Activation

4.1.1 The Technical and Engineering Support Supervisor shall advise the Design Engineering Technical Group Leaders of the nature of the emergency condition at the DAEC.

a) The Technical and Engineering Support Supervisor should also notify the Manager, Applications Engineering of the nature of the emergency at the DAEC and request engineering support as required.

NOTE

As described in CPIP 1.2, "Corporate Notification", staffing of the EOF Engineering Group shall be accomplished within 4 hours of notificaiton.

4.1.2 Upon being briefed by the Emergency Support Manager regarding plant conditions, response action status, and initial tasks to be accomplished, the Technical and Engineering Support Supervisor should:

a) Contact the Technical and Engineering Supervisor in the TSC to review current plant status, determine specific response actions underway and being planned, and define engineering support tasks to be accomplished in the EOF.

b) Brief Task Group Leaders in the EOF on the latest information received and actions to be taken, and ensure that the Task Groups are adequately staffed and ready to perform their designated functions.

c) Advise the Emergency Support Manager that the assembled personnel are ready to perform their assigned functions.

4.2 Support Group Functions

4.2.1 Engineering personnel normally will provide engineering support in one of three Task Groups:

a) Technical Analysis

b) Design Change

c) Vendor Contact

4.2.2 The tasks of the Technical and Analysis Task Group are as follows:

a) Assist TSC staff personnel in evaluating plant conditions, identifying corrective action options for problems which are discovered and analyzing parameter trends which become apparent for their significance.

b) Recommend prioritization of response options which are available and which, if implemented, should assist in mitigating the event, restoring the plant to a safe condition, and minimizing or stopping any radiological release in progress.

c) Propose engineering design changes for further evaluation by the Design Change Request Task Group.

4.2.3 The tasks of the Design Change Request Task Group are as follows:

a) Develop design change packages including prints, installation instructions and operating limitations.

a) Determine the availability of existing hardware either at the DAEC or which may be available within Iowa Electric at other locations and modify the design change package, as necessary, to enable use of readily available hardware.

c) Develop engineering justifications, as required; e.g., use of non-standard or non-code components on a temporary basis in a safety related system or system important to safety.

NOTE

Unless waived by the Emergency Response and Recovery Director, engineering work shall be accomplished in accordance with existing administrative, engineering and project procedures.

4.2.4 The tasks of the Vendor Contact Task Group are as follows:

a) Contact applicable vendors and industry organizations such as General Electric, Bechtel, INPO, etc., with expertise in specialized areas who may be able to contribute to analyzing the cause of the event, evaluating plant conditions, proposing solutions to problems, and identifying response actions to be pursued.

b) Arrange for telephone conferences or meetings between such vendors and cognizant Iowa Electric personnel.

c) Pursue additional contacts with other vendors based upon recommendations received to ensure that the most competent technical assistance can be applied to the problem(s) being experienced.

d) Coordinate procurement activities between the other Task Groups, Vendors and Contractor and with Iowa Electric's Purchasing, Insurance, and Legal Departments.

4.2.5 Licensing personnel should be available for consultation with DAEC and Corporate Management personnel to:

a) Ensure that proposed response options do not violate license conditions or Technical Specifications, or, if so,

b) Propose changes to the license or Technical Specifications, review and/or develop the basis for justifying the approach selected, and solicit approval from the NRC, as directed by the Emergency Response and Recovery Director.

4.2.6 Fuels personnel should be available for consultation with the fuel supplier and/or the fuels consultants in the event of a fuels related problem.

4.2.7 In addition to providing support in one of the functional groups, discussed in paragraphs 4.2.2 through 4.2.6, selected engineering, licensing, and fuels personnel may also provide support for the following functions, as described in CPIP 1.3, "Activation and Operation of the EOF", and CPIP 2.1, "Dose Assessment and Protective Action Recommendations".

a) Communications

b) Status recording

c) Radiological assessment

4.2.8 Additionally, the Emergency Support Manager may request the Technical and Engineering Support Supervisor make personnel

available to provide assistance in related support functions, including:

a) Augmenting DAEC Emergency Response Organization staffing with personnel who are appropriately experienced.

b) Drafting temporary procedures for use by operating personnel due to abnormal system configurations and/or operability limitations.

c) Developing technical material for use by Corporate Management personnel during briefings.

d) Providing escort services for technical experts brought in to solve specific problems.

e) Serving on special task forces convened to review technical problems.

4.3 Operation

4.3.1 The Technical and Engineering Support Supervisor should consult frequently with the Technical and Engineering Supervisor in the TSC to ensure that engineering efforts available within the EOF are being properly applied.

4.3.2 The Engineering Information Communicator should remain in contact with his/her counterpart at the DAEC to aid in ensuring that EOF engineering support efforts are properly directed and that EOF Engineering Task Groups are apprised of the latest status information.

a) This circuit should be used to transmit detailed technical information and to discuss problems and proposed solutions with TSC engineering personnel.

b) Information received should be recorded using the EOF Log Sheet format, or equivalent, provided in CPIP 1.3, "Activation and Operation of the EOF".

4.3.3 Pertinent information, new information and information which may appear to conflict with previously understood status should immediately be brought to the attention of the Technical and Engineering Support Supervisor by the Engineering Information Communicator.

a) The Technical and Engineering Support Supervisor should evaluate such information and take action to resolve any apparent conflicts.

b) Where appropriate, the Technical and Engineering Support Supervisor may draft messages requesting follow-up

information using the Status Update Message form, provided in CPIP 1.3, "Activation and Operation of the EOF", passing them on through the Emergency Response and Recovery Director to the TSC "Dedicated" Communicator.

4.3.4 Trending of important plant parameters should normally be accomplished in the EOF by the Plant Status Recorder.

a) Such trending activities should be coordinated by the Technical and Engineering Support Supervisor with the Technical and Engineering Supervisor in the TSC such that efforts being made by the Plant Status Recorder complement those being accomplished at the DAEC yet are adequate for the needs of engineering and management personnel in the EOF.

b) The Technical Analysis Task Group should evaluate such trends and provide recommendations regarding response options, event reclassification, etc. to the Technical and Engineering Support Supervisor.

c) The Technical and Engineering Support Supervisor should ensure that such information is provided to the Technical and Engineering Supervisor in the TSC.

d) Additionally, the Technical and Engineering Support Supervisor should apprise the Emergency Response and Recovery Director through the Emergency Support Manager of such trend evaluations and associated recommendations.

4.3.5 Engineering solutions developed through the combined efforts of the three Task Groups should be evaluated for their applicability by the Technical and Engineering Support Supervisor.

a) Proposed solutions and their basis should be provided to the Technical and Engineering Supervisor in the TSC for further evaluation by TSC staff personnel and, if determined to be appropriate, implementation.

b) In a like manner, engineering solutions developed in the TSC may be independently reviewed by EOF staff personnel.

4.3.6 Proposed response options developed by the Technical Analysis Task Group should also be evaluated by the Technical and Engineering Support Supervisor for applicability and if appropriate, recommended to the Technical and Engineering Supervisor in the TSC for consideration by TSC staff and on-shift Operations personnel.

4.4 Documentation of Engineering Analysis

4.4.1 Unless waived by the Emergency Response and Recovery Director, all engineering activities performed during the emergency shall be performed in accordance with standard practices employed by Iowa Electric.

a) The Technical and Engineering Support Supervisor should evaluate such practices and where warranted, recommend waivers of specific requirements that will aid in resolving plant problems, yet not jeopardize plant safety.

b) The Technical and Engineering Support Supervisor should discuss such recommendations with the Technical and Engineering Supervisor in the TSC, as applicable, and seek his input regarding waivers desired by personnel at the DAEC.

c) Based upon such discussions, the Technical and Engineering Support Supervisor should propose such waivers to the Emergency Support Manager.

4.4.2 The Emergency Support Manager should evaluate such requests and review them with the Manager, Quality Assurance and the Emergency Response and Recovery Director.

4.4.3 If approved by the Emergency Response and Recovery Director, documentation of such approval should be recorded in the EOF Log and authorization transmitted to the Emergency Coordinator.

4.4.4 Activities subsequently conducted under such waivers shall be tracked by Quality Assurance personnel, as specified in CPIP 2.4, "Quality Assurance and Quality Control Activities".

5.0 REFERENCES

5.1 Corporate Emergency Response Plan

5.2 NUREG 0654, Rev. 1

6.0 ATTACHMENTS

None

| CORPORATE PLAN IMPLEMENTING PROCEDURE | No. CPIP - 2.2 Rev. 3<br>PAGE 8 of 8 |
|---|---|
| TECHNICAL SUPPORT COORDINATION | EFFECTIVE DATE: JUL 19 1990 |

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Group Leader, Emergency Planning

Approved by: [signature] Date: 7/2/90
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