

November 20, 2014

DISTRIBUTION CONTROL LIST
IPEC EMERGENCY PLAN

Document Name:

NAME	LOCATION	MAIL STOP
IRAOLA, TONY	FOR THE JIC	GSB-2 ND FL
***** (SEE BELOW FOR DISTRIBUTION FOR TONY IROLA) *****		
DOCUMENTS	CONTROL ROOM, 53' ELEV	IP3
DOCUMENTS	SHIFT MANAGER, 53' ELEV	IP3
DOCUMENTS	CCR 53' ELEV	IP2
EOF	E-PLAN (ALL EP'S)	EOF
PEREZ, ROSE	AEOF (ALL EP'S)	WPO-12D
DOCUMENTS	TSC 53' ELEV	IP2
BARR, STEVE (+ GEN REC'S)	NRC (ALL EP'S)	OFFSITE
BARR, STEVE (+ GEN REC'S)	NRC (ALL EP'S)	OFFSITE
DOC CONTROL DESK (+ GEN REC'S)	NRC (ALL EP'S)	OFFSITE
CULLINAN, P	J A (PLAN ONLY)	OFFSITE
E-PLAN STAFF	E-PLAN (ALL EP'S)	GSB-2 ND FL
<u>FISCH, TED</u>	NEW YORK STATE OEM (ALL)	OFFSITE
	(SEE BELOW ON 2 ND PAGE)	
DELBORGO, D	WESTCHESTER OEM (PLAN & SOME EP'S)	OFFSITE
LONGO, N JR.	ROCKLAND OEM (PLAN & SOME EP'S)	OFFSITE
FISHER, SHANNON	ORANGE COUNTY OEM (PLAN & SOME EP'S)	OFFSITE
STIEBELING, ADAM	PUTNAM OEM (PLAN & SOME EP'S)	OFFSITE
DOCUMENTS	CLASSROOM 4 & 5 (4 COPIES)	IP2 SIM BLDG
STELLATO, CINDY	SIMULATOR, TRAINING	48-2-A
STELLATO, CINDY	LRQ CLASSROOM, TRAINING	48-2-A
DOCUMNETS	SIMULATOR	U2 SIM BLDG
STELLATO, CINDY	TRAINING (IP3)	48-2-A
BUTLER, NORVA	TRAINING (IP2)	48-2-A
NRC RESIDENT INSPECTOR	US NRC (88' ELEVATION)	IP2

*****U2 SIMULATO BLDG, 1ST FL BREAKROOM*****

TONY IRAOLA GETS:..... E-PLAN, IP-EP-115 (FORMS), IP-EP-260(JOINT CENTER INFORMATION) " NO FORMS GO TO THE OFFSITE LOCATIONS

*****COUNTY LOCATIONS RECEIVE THE E-PLAN, IP-EP-310 (DOSE ASSESSMENT & IP-EP-340 (MIDAS) (IP-EP-340 GOES TO ALL OFFSITERS)**** DO NOT GET 210...(115 GOES TO ALL EXCEPT THE COUNTYS OFFSITERS)**

*****TED FISCH GETS: IP-EP-115, 120, 210, 250, 340, 360, 410, 420, 430, 620, IP-1055, AND E-PLAN*****

CONTROL COPY STAMP ALL PROCEDURES AND DRAWINGS

EFFECTIVE DATE: 12/3/14

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IPEC , P.O. Box 308, Buchanan, NY
10511

CONTROLLED DOCUMENT
TRANSMITTAL FORM - PROCEDURES

TO: DISTRIBUTION

DATE: 11/18/14

TRANSMITTAL NO:

FROM: IPEC DOCUMENT CONTROL:

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IP3

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AFFECTED DOCUMENT: IPEC EMERGENCY PLAN

DOC #	REV #	TITLE	INSTRUCTIONS
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THE FOLLOWING PROCEDURE (S), DRAWING (S) HAVE BEEN REVISED, PLEASE REMOVE YOUR CURRENT COPY AND REPLACE WITH ATTCHED UPDATED PROCEDURE (S), DRAWING (S):

IPEC-EP REV.16

*****PLEASE NOTE EFFECTIVE DATE*****

RECEIPT OF THE ABOVE LISTED DOCUMENT(S) IS HEREBY ACKNOWLEDGED. I CERTIFY THAT ALL SUPERSEDED, VOID, OR INACTIVE COPIES OF THE ABOVE LISTED DOCUMENT(S) IN MY POSSESSION HAVE BEEN REMOVED FROM USE AND ALL UPDATES HAVE BEEN PERFORMED IN ACCORDANCE WITH EFFECTIVE DATE(S) (IF APPLICABLE) AS SHOWN ON THE DOCUMENT(S).

NAME (PRINT)

SIGNATURE

DATE

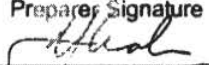

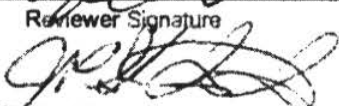
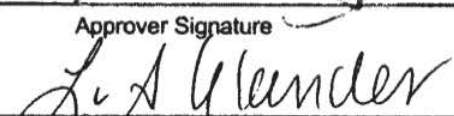
CC#

Doc Control Dept

Procedure/Document Number: IPEC-EP		Revision: 14- 01 (MERLIN Revision 16)	
Equipment/Facility/Other: Indian Point Energy Center (IPEC)			
Title: Indian Point Energy Center Emergency Plan			
<p>Part I. Description of Activity Being Reviewed: The activity being reviewed is a revision to IPEC-EP-13-01, "Emergency Plan", to incorporate changes identified in the attached Revision Matrix.</p> <ul style="list-style-type: none"> • Refer to attached Revision Matrix 			
<p>Part II. Activity Previously Reviewed?</p> <p>If YES, identify bounding source document number/approval reference and ensure the basis for concluding the source document fully bounds the proposed change is documented below:</p> <p>Justification: N/A</p> <p><input type="checkbox"/> Bounding document attached (optional)</p>		<p><input type="checkbox"/> YES 50.54(q)(3) Evaluation is NOT required. Enter justification below and complete Part VI.</p>	<p><input checked="" type="checkbox"/> NO Continue to next part</p>
<p>Part III. Applicability of Other Regulatory Change Control Processes</p> <p>Check if any other regulatory change processes control the proposed activity.(Refer to EN-LI-100)</p> <p>NOTE: For example, when a design change is the proposed activity, consequential actions may include changes to other documents which have a different change control process and are NOT to be included in this 50.54(q)(3) Screening.</p>			
<p>APPLICABILITY CONCLUSION</p> <p><input checked="" type="checkbox"/> If there are no controlling change processes, continue the 50.54(q)(3) Screening.</p> <p><input type="checkbox"/> One or more controlling change processes are selected, however, some portion of the activity involves the emergency plan or affects the implementation of the emergency plan; continue the 50.54(q)(3) Screening for that portion of the activity. Identify the applicable controlling change processes below.</p> <p><input type="checkbox"/> One or more controlling change processes are selected and fully bounds all aspects of the activity. 50.54(q)(3) Evaluation is NOT required. Identify controlling change processes below and complete Part VI.</p>			
<p>CONTROLLING CHANGE PROCESSES</p> <p>10 CFR 50.54(q) ONLY</p>			
<p>Part IV. Editorial Change</p> <p>Is this activity an editorial or typographical change such as formatting, paragraph numbering, spelling, or punctuation that does not change intent?</p> <p>Justification: Changes 1, 4 and 6 per the attached revision matrix, are considered editorial changes per Reg. Guide 1.219 Section 5.1 a.</p> <p>"NO" is checked because the procedure revision contains non-editorial changes per the attached revision matrix.</p>		<p><input type="checkbox"/> YES 50.54(q)(3) Evaluation is NOT required. Enter justification and complete Part VI.</p>	<p><input checked="" type="checkbox"/> NO Continue to next part</p>

Procedure/Document Number: IPEC – EP	Revision: 14-01 (MERLIN Revision 16)
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Title: Indian Point Energy Center Emergency Plan	
Part V. Emergency Planning Element/Function Screen (Associated 10 CFR 50.47(b) planning standard function identified in brackets) Does this activity affect any of the following, including program elements from NUREG-0654/FEMA REP-1 Section II?	
1. Responsibility for emergency response is assigned. [1]	<input type="checkbox"/>
2. The response organization has the staff to respond and to augment staff on a continuing basis (24/7 staffing) in accordance with the emergency plan. [1]	<input type="checkbox"/>
3. The process ensures that on shift emergency response responsibilities are staffed and assigned. [2]	<input type="checkbox"/>
4. The process for timely augmentation of on-shift staff is established and maintained. [2]	<input type="checkbox"/>
5. Arrangements for requesting and using off site assistance have been made. [3]	<input type="checkbox"/>
6. State and local staff can be accommodated at the EOF in accordance with the emergency plan. [3]	<input type="checkbox"/>
7. A standard scheme of emergency classification and action levels is in use. [4]	<input type="checkbox"/>
8. Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes after declaration of an emergency and providing follow-up notifications. [5]	<input type="checkbox"/>
9. Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway. [5]	<input type="checkbox"/>
10. The public ANS meets the design requirements of FEMA-REP-10, Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants, or complies with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter. [5]	<input type="checkbox"/>
11. Systems are established for prompt communication among principal emergency response organizations. [6]	<input type="checkbox"/>
12. Systems are established for prompt communication to emergency response personnel. [6]	<input type="checkbox"/>
13. Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway emergency planning zone (EPZ). [7]	<input type="checkbox"/>
14. Coordinated dissemination of public information during emergencies is established. [7]	<input type="checkbox"/>
15. Adequate facilities are maintained to support emergency response. [8]	<input checked="" type="checkbox"/>
16. Adequate equipment is maintained to support emergency response. [8]	<input type="checkbox"/>
17. Methods, systems, and equipment for assessment of radioactive releases are in use. [9]	<input type="checkbox"/>
18. A range of public PARs is available for implementation during emergencies. [10]	<input checked="" type="checkbox"/>
19. Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities. [10]	<input checked="" type="checkbox"/>
20. A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.[10]	<input type="checkbox"/>

Procedure/Document Number: IPEC-EP	Revision: 14-01 (MERLIN Revision 16)
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21. The resources for controlling radiological exposures for emergency workers are established. [11]	<input type="checkbox"/>
22. Arrangements are made for medical services for contaminated, injured individuals. [12]	<input type="checkbox"/>
23. Plans for recovery and reentry are developed. [13]	<input type="checkbox"/>
24. A drill and exercise program (including radiological, medical, health physics and other program areas) is established. [14]	<input checked="" type="checkbox"/>
25. Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills are assessed via a formal critique process in order to identify weaknesses. [14]	<input type="checkbox"/>
26. Identified weaknesses are corrected. [14]	<input type="checkbox"/>
27. Training is provided to emergency responders. [15]	<input type="checkbox"/>
28. Responsibility for emergency plan development and review is established. [16]	<input type="checkbox"/>
29. Planners responsible for emergency plan development and maintenance are properly trained. [16]	<input type="checkbox"/>
APPLICABILITY CONCLUSION	
<input type="checkbox"/> If no Part V criteria are checked, a 50.54(q)(3) Evaluation is <u>NOT</u> required; document the basis for conclusion below and complete Part VI.	
<input checked="" type="checkbox"/> If any Part V criteria are checked, complete Part VI and perform a 50.54(q)(3) Evaluation.	
BASIS FOR CONCLUSION	
<p>Change 7- For multiple-accident dose assessment, the MIDAS computer software uses the same modeling that is used for determining single-accident release rates, projected downwind concentrations, dose rates and integrated doses. The MIDAS multiple-accident capability allows the individual contributions from up to five simultaneous releases to be calculated and summed.</p> <p>This feature was added to MIDAS to facilitate assessment activities potentially affecting both units. The only change to the software was how it calculates and displays the combined map displays and dose summary information. A 50.54q was performed on the MIDAS software change Revision 1.5.16.010714 and approved on Jan. 8, 2014.</p> <p>Inclusion of the multiple release capabilities of the software is an enhancement to the plan. This change does not change the meaning or intent of a description, does not change facilities or equipment, and does not change a process. No further evaluation is required for this change.</p>	
<p>Change 11- The same facility previously referred to as a "county reception center" which is located at the Westchester Co. Fire Training Center, Valhalla, NY, was incorrectly described in Section K. The facility should have been referred to as an emergency worker monitoring and decontamination center. Processes for radiological monitoring and decontamination of personnel, vehicles and equipment are the same. There is no change to the referenced facility location or related processes.</p> <p>This change does not change the meaning or intent of a description, does not change facilities or equipment, and does not change a process. No further evaluation is required for this change.</p>	
<p>Change 18- Administrative revisions, typo is previous year's plan revision. New text is consistent with text in current ETE document (KLD Report TR-557, pages 4-3 through 4-6, Table 4-1A through 4-1D)</p> <p>This change does not change the meaning or intent of a description, does not change facilities or equipment, and does not change a process. No further evaluation is required for this change.</p>	
<p>Emergency Planning Standards 15, 18, 19, and 24, in Part V of this form, are affected by the remaining changes identified on the revision matrix. A 10 CFR 50.54(q) evaluation will be performed to determine if the effectiveness of the IPEC Emergency Plan is reduced and prior NRC approval is required.</p>	

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Equipment/Facility/Other: Indian Point Energy Center		
Title: Indian Point Energy Center Emergency Plan		
Part VI. Signatures:		
Preparer Name (Print) Tony Iraola	Preparer Signature 	Date: 11/2/14
(Optional) Reviewer Name (Print) Tony Ambrose	Reviewer Signature 	Date: 11/7/14
Reviewer Name (Print) John P. Standridge Nuclear EP Project Manager	Reviewer Signature 	Date: 11/2/14
Approver Name (Print) Lori Glander EP Manager or designee	Approver Signature 	Date: 11-13-14

Procedure/Document Number: IPEC - EP	Revision: 14-01 (MERLIN Revision 16)
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Title: Indian Point Energy Center Emergency Plan	

Part I. Description of Proposed Change: The activity being reviewed is a plan revision to IPEC-EP 13-01, "Indian Point Energy Center Emergency Plan", including:

- Refer to attached Revision Matrix.

Part II. Description and Review of Licensing Basis Affected by the Proposed Change:

The IPEC Emergency Plan has been reviewed through the Process Applicability Determination (PAD) in accordance with the criteria described in NEI 96-07 and EN-LI-100. This proposed change does not (1) change the facility or procedures as described in the UFSAR or (2) create a test or equipment not described in the UFSAR and is governed under the Emergency Plan 10 CFR 50.54(q) screening process in accordance with EN-EP-305. These proposed changes do not involve structures, systems or components controlled by 10 CFR 50.59 or 72.48 and do not have the potential to impact any of the License Basis Documents (LBDs) on the PAD form, except for the Emergency Plan. All responses to the questions contained in sections III and IV of the PAD form were determined to be "no impact". Since these proposed changes do not contain any requirements that could affect any LBDs other than the Emergency Plan, it is determined to be fully governed under 10 CFR 50.54(q). In addition to those reviewed for the PAD, each of the following documents/relevant sections was reviewed:

- a) Reviewed current Plan, all sections Part 1 and Part 2. No additional relevant or affected Plan content was identified.
- b) The original Plans, U2 1970 and U3 1973, were not available for review.
- c) Historical 10CFR50.54(q) documents were manually reviewed dating back to 2005 for significant changes: No differences related to the need to compensate for preparedness or response constraints or vulnerabilities specific to the facility, EPZ or jurisdiction were found for the historical search period. Some items associated with the current proposed changes were identified as described below:

Reviewed NSIR/DPR-ISG-01 for applicability to Plan changes that were both evaluated and screened out.

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Part III. Describe How the Proposed Change Complies with Relevant Emergency Preparedness Regulation(s) and Previous Commitment(s) Made to the NRC:

Previous Commitments to the NRC – Per EN-LI-110, the licensing management system used for tracking NRC commitments was searched and no results were found related to proposed changes to the IPEC Emergency Plan.

10 CFR 50.47(b)(8)—Emergency Facilities and Equipment

- Adequate facilities are maintained to support emergency response

Site Compliance: IPEC has established an Alternative Technical Support Center/ Operations Support Center (TSC/OSC) at the Verplanck Fire House in accordance with 10 CFR Part 50 Appendix E, Section E.8.d. The new Alternative TSC/OSC also replaces an alternate facility provided by the City of Peekskill Fire Department. The Memorandum of Understanding for the City of Peekskill is no longer required.

10 CFR 50.47(b)(10): Emergency Protective Actions

- Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.
- A range of public PARs is available for implementation during emergencies.

Site Compliance: IPEC has established evacuation time estimates for the population located in the plume exposure pathway EPZ that are available to support the formulation of PARs and have been provided to State and local governmental authorities. The guidance of NUREG-0654 Supplement 3 provides an acceptable method to comply with 10CFR50 Appendix E IV.3 in the use of evacuation time estimates in the formulation of protective action recommendations (PARs) for the plume exposure emergency planning zone, and provides guidance for the provisions of 10 CFR 50.47(b)(10) in the development of a range of PARs.

In addition, this revision includes NUREG-0654 Supplement 3 guidance that when at a General Emergency the need to evacuate the general public within 2 miles ring of the Indian Point Energy Center and 5 miles downwind, the remaining population within the EPZ should monitor the Emergency Alert System (EAS) for further direction.

10 CFR 50.47(b)(14) - Drill and Exercise Program

- Periodic exercises are conducted to evaluate major portions of emergency response capabilities, drills are conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are corrected.

Site Compliance: This revision changes the exercise cycle from a six year cycle to an eight year cycle and spans 4 biennial exercises in accordance with new REP Program Manual (June 2013) and 10 CFR Part 50, Appendix E, Section IV.F.2.j. Proposed change continues to meet the requirements of 10CFR50.47(b)(14) and the IPEC Emergency Plan.

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Part IV. Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change:

10 CFR 50.47(b)(8)—Emergency Facilities and Equipment

Function:

- Adequate facilities are maintained to support emergency response

Program Elements: Sections IV.E.1–4, IV.E.8, and IV.G of Appendix E to 10 CFR Part 50 provide supporting requirements. Informing criteria appear in Section II.H of NUREG-0654; NUREG-0696, “Functional Criteria for Emergency Response Facilities, issued February 1981 (Ref. 13); and in the IPEC Emergency Plan.

10 CFR 50.47(b) (10)—Emergency Protective Actions

Function:

- Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.
- A range of public PARs is available for implementation during emergencies.

Program Elements: Appendix E to 10 CFR Part 50 does not contain any support requirements. Informing criteria appear in NUREG-0654 in Sections II.J.1-8, Section II.J.10, and NUREG- 0654 Supplement 3 and in the IPEC Emergency Plan.

10 CFR 50.47(b)(14) - Drill and Exercise Program

Function:

- Periodic exercises are conducted to evaluate major portions of emergency response capabilities, drills are conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are corrected.

Program Elements: 10 CFR Part 50, Appendix E, Section IV.F.2.j provides supporting requirements. Informing criteria appear in Section II.N.1.b of NUREG-0654 and in the IPEC Emergency Plan.

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Part V. Description of Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions:

The following changes have been evaluated for their ability to meet the planning standards identified and for potential reduction in effectiveness of the IPEC Emergency Plan.

Changes 2 and 9: The coordination of protective action implementation with offsite response organizations was based on the implementation of NRC EP Rule Changes and the promulgation of NUREG-0654 Supplement 3. Supplement 3 provides the guidance that when at a General Emergency, the need to evacuate the general public within 2 miles ring of the Indian Point Energy Center and 5 miles downwind, implement the NY State KI plan, the remaining population within the EPZ should monitor the Emergency Alert System (EAS) for further direction.

The change does not represent a reduction in the effectiveness of the emergency plan, continues to meet planning standard 10 CFR 50.47(b)(10) and can be incorporated without prior NRC approval because it is consistent with the latest FEMA and NRC guidance in NUREG-0654 Supplement 3 on protective action implementation.

Changes 3 and 5: An Alternative Technical Support Center/Operations Support Center (joint facility) is implemented and complies with 10 CFR Appendix E to Part 50 section E.8.d which requires the facility to be accessible even if the site is under threat of or experiencing hostile action to function as a staging area for augmentation of emergency response staff and collectively having the following characteristics: the capability for communications with the emergency operations facility, control room and plant security; and the capability for engineering assessment activities. The Alternate EOF has the capability to perform offsite notifications.

The change does not represent a reduction in the effectiveness of the emergency plan, continues to meet planning standard 10 CFR 50.47(b)(8) and can be incorporated without prior NRC approval because it is consistent with 10 CFR Appendix E to Part 50 section E.8.d for an alternative facility if the site is under threat or experiencing a hostile action.

Change 8 and 10: The coordination of protective action implementation with offsite response organizations was based on the implementation of NRC EP Rule Changes and the promulgation of NUREG-0654 Supplement 3. The guidance of Supplement 3 provides an acceptable method to comply with 10CFR50 Appendix E IV.3 in the use of evacuation time estimates in the formulation of protective action recommendations (PARs) for the plume exposure emergency planning zone, and provides guidance for the provisions of 10 CFR 50.47(b)(10) in the development of a range of PARs.

The change does not represent a reduction in the effectiveness of the emergency plan, continues to meet planning standard 10 CFR 50.47(b)(10) and can be incorporated without prior NRC approval because it is consistent with the latest FEMA and NRC guidance in NUREG-0654 Supplement 3 on protective action implementation.

Change 12: The Six year plan has been revised to an Eight year plan based on the implementation of NRC EP Rule Changes. It has been specifically changed in 10CFR Part 50, Appendix E, Section IV.F.2.j and the new REP Program Manual (June 2013) NUREG Criterion N.1.b.

The change does not represent a reduction in the effectiveness of the emergency plan, continues to meet planning standard 10 CFR 50.47(b)(14) and can be incorporated without prior NRC approval because it implements the regulatory changes and FEMA REP Program Manual (June 2013) for an 8 year exercise cycle.

Change 13: Six year plan has been revised to an Eight year plan based on the implementation of NRC EP Rule Changes. It has been specifically changed in 10CFR Part 50, Appendix E, Section IV.F.2.j and the new REP Program Manual (June 2013) NUREG Criterion N.1.b.

The change does not represent a reduction in the effectiveness of the emergency plan, continues to meet planning standard 10 CFR 50.47(b)(14) and can be incorporated without prior NRC approval because it implements the regulatory changes and FEMA REP Program Manual (June 2013) for an 8 year exercise cycle.

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Change 14: The offsite TSC/OSC staging area was moved from one location/jurisdiction (Peekskill) to another location jurisdiction (Verplanck). The City of Peekskill Fire Department letter of agreement is therefore removed and no longer required. The command center is now the offsite Alternative Technical Support Center/Operations Support Center (joint facility). The Verplanck Fire District letter of agreement reflects additional wording which describes the additional designated areas for a command staff and equipment to support an emergency response for IPEC. This LOA replaces the Peekskill Fire Department LOA. The change does not represent a reduction in the effectiveness of the emergency plan, continues to meet planning standard 10 CFR 50.47(b)(8) and can be incorporated without prior NRC approval because it meets the latest NRC regulatory requirements from 10CFR50 Appendix E section E.8.d for an offsite alternative facility if the site is under threat or experiencing a hostile action.

Change 15: The scenario type table headers were changed to agree with the scenario type table headers in the ETE document (KLD Report TR-557, page 4-8). The change does not represent a reduction in the effectiveness of the emergency plan, continues to meet planning standard 10 CFR 50.47(b)(10) and can be incorporated without prior NRC approval because the scenario type table headers now agree with the originally NRC approved ETE developed in accordance with NUREG/CR-7002.

Change 16 and 17: IPEC 10 mile EPZ is divided into 38 Protective Action Areas (PAA). The Hudson River is one of the 38 PAAs. The 2013 ETE only considered 37 of the 38 PAAs because the Hudson River has no road network to perform an evacuation estimate. During the 2013 revision of the E-Plan the number of PAAs was changed from 38 to 37 to match the number of PAAs included in the ETE. The Hudson River is still included as a PAA and should still be included in the total number of PAAs. The change does not represent a reduction in the effectiveness of the emergency plan, continues to meet planning standard 10 CFR 50.47(b)(10) and can be incorporated without prior NRC approval because the total number of PAAs in the 10 mile EPZ is 38 and this change corrects the value in this section of the E-Plan.

Change 19: All ETEs are now consistent with ETEs in the current ETE document (KLD Report TR-557, pages 5-11 and 5-16). All ETE simulations were rerun in 2014 while preparing the ETE Addendum (KLD Report TR-557). During the 2014 simulations, the following changes were made: (1) Node 1186 at the intersection of US 6 and Route 52 in Carmel – turns were blocked that allow access to US 6 westbound. The current county traffic control plan blocks these turns. They were not input correctly in the 2012 simulations; (2) Node 1190 at the intersection of Peekskill Hollow Rd and Route 301 near Carmel, NY – changed to a TCP. This was a stop sign for Peekskill Hollow Rd and no control for Route 301 in the 2012 ETE report (KLD TR-537). While running the 2014 simulations of the keyholes consisting of the 2-mile radius and 10 miles downwind, traffic congestion at this intersection lasted for more than an hour longer than any other intersection in the study area. Changing this to a TCP resulted in the traffic congestion clearing significantly earlier; (3) The commuter college traffic (West Point, Pace University, Mercy College, and Ohr Hamier Seminary School) discussed in Section 3.1.2 of the 2012 ETE report (KLD TR-537) was mistakenly zeroed out in the input streams for the 2012 simulations. This resulted in as many as 2,419 (see Table 6-4 in TR-537) vehicles not being included in the 2012 simulations depending on the scenario. The 3 aforementioned changes to the input streams resulted in changes to the ETE:

- 2-mile region (R01) – no change
- 5-mile region (R02) – changes in 90th percentile ETE ranging from -15 to +20 minutes; no change in 100th percentile ETE
- Full EPZ (R03) – changes in 90th percentile ETE from -30 to +10 minutes; changes in 100th percentile ETE from -40 to +20 minutes
- Keyholes – 2 around, 5 down – no change
- Keyholes – 5 around, 10 down – no change in 90th percentile ETE; changes in 100th percentile ETE ranging from -30 to +30 minutes

The largest overall ETE change is a decrease of 40 minutes for the roadway impact scenario (Scenario 15) for the Full EPZ. In the roadway impact scenario, a lane is closed on the Taconic Parkway northbound in Putnam County. Many of the vehicles evacuating northbound on Peekskill Hollow Road use the access ramp to the Taconic Parkway northbound. With a single lane closed on the Taconic, congestion on this ramp is significant. Due to the new TCP at the intersection of Peekskill Hollow Rd and Route 301, more vehicles opt to stay on Peekskill Hollow Rd rather than taking the Taconic

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and vehicles are able to evacuate the EPZ 40 minutes faster than in the 2012 simulations. The change does not represent a reduction in the effectiveness of the emergency plan, continues to meet planning standard 10 CFR 50.47(b)(10) and can be incorporated without prior NRC approval because these changes in ETE have no impact on the Protective Action Recommendation (PAR) updates performed in 2014 since the ETE for the 2-mile region and the keyholes consisting of the 2-mile radius and 5 miles downwind were not changed. The ETE was developed in accordance with NUREG/CR-7002.

Conclusion Regarding Impact

The proposed changes to the EPLAN Rev 14-01, continue to meet the planning standards outlined in 10 CFR 50.47(b)(8), (10) and (14). This revision does not represent a reduction in effectiveness to the IPEC Emergency Plan and can be incorporated without prior NRC approval.


Part VI. Evaluation Conclusion

Answer the following questions about the proposed change.

- | | |
|---|---|
| 1. Does the proposed change comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| 2. Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. Does the proposed change constitute an emergency action level scheme change? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

If questions 1 or 2 are answered NO, or question 3 answered YES, reject the proposed change, modify the proposed change and perform a new evaluation or obtain prior NRC approval under provisions of 10 CFR 50.90. If questions 1 and 2 are answered YES, and question 3 answered NO, implement applicable change process(es). Refer to step 5.6[8].

Part VII. Signatures

Preparer Name (Print) Tony Iraola	Preparer Signature 	Date: 11/13/14
(Optional) Reviewer Name (Print) Tony Ambrose	Reviewer Signature 	Date: 11/13/14
Reviewer Name (Print) John P. Standridge Nuclear EP Project Manager	Reviewer Signature 	Date: 11/13/14
Approver Name (Print) Lori Glander EP Manager or designee	Approver Signature 	Date: 11-13-14

I. OVERVIEW

PAD Rev. #: 0

Facility: Indian Point Energy Center (IPEC)

Proposed Activity / Document: IPEC-EP (Emergency Plan)

Change/Rev. #: 14-01 (Merlin 16)

Description of Proposed Activity: IPEC Emergency Plan revision to incorporate changes based on the annual review.

II. DOCUMENT REVIEW

Provide the requested information for each item below.

1. For documents available electronically:**a. List search engine or documents searched, and keywords used:**

U2/U3 Technical Specifications, U2/U3 FSARs, NRC Orders, and LRS Commitments, IPEC Emergency Plan: Keywords: Emergency Plan, Emergency, Plan

b. List relevant sections of controlled electronic documents reviewed:

LBD sections searched electronically in U2/U3 Technical Specifications, U2/U3 FSARs, NRC Orders, IPEC Emergency Plan and LRS Commitments: No relevant "hits" were found relating to proposed activity.

2. Documents reviewed manually (hardcopy):

10CFR50.54(q) Screens and Evaluations for the E Plan revisions from 2005 thru 2013

3. For those documents that are not reviewed either electronically or manually, use the specific questions provided in Sections III and IV of Attachment 9.2 of EN-LI-100 as needed. Document below the extent to which the Attachment 9.2 questions were used.

Reviewed complete Att. 9.2 of EN-LI-100 Revision 12. Emergency Plan (10 CFR 50.54(q) / EN-EP-305) section is applicable due to change being controlled by 10 CFR 50.54(q).

III. PROCESS REVIEW

Does the proposed activity affect, invalidate, or render incorrect, OR have the potential to affect, invalidate, or render incorrect, information contained in any of the following processes? Associated regulations and procedures are identified with each process below.

PROCESS (Regulations / Procedures)	YES	NO	REVIEW RESULTS
Chemistry / Effluents	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Radwaste / Process Control Program (PCP) (EN-RW-105 or contact the Radiation Protection Dept.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Radiation Protection / ALARA (10 CFR 20 / EN-RP-110 or contact the Radiation Protection Dept.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Inservice Inspection Program (10 CFR 50.55a / EN-DC-120, -351)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Inservice Testing Program (10 CFR 50.55a / EN-DC-332)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Maintenance Rule Program (10 CFR 50.65 / EN-DC-203, -204, -205, -206, -207)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Containment Leakage Rate Testing (Appendix J) Program (10 CFR 50 Appendix J / EN-DC-334)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

IF any box is checked "Yes," THEN contact the appropriate department to ensure that the proposed change is acceptable and document the results in the REVIEW RESULTS column.

IV. LICENSING BASIS DOCUMENT REVIEW

Does the proposed activity affect, invalidate, or render incorrect, OR have the potential to affect, invalidate, or render incorrect, information contained in any of the following Licensing Basis Document(s)? Associated regulations and procedures are identified with each Licensing Basis Document below.

LICENSING BASIS DOCUMENTS (Regulations / Procedures)	YES	NO	REVIEW RESULTS OR SECTIONS AFFECTED OR LBDCR #
Quality Assurance Program Manual (QAPM) (10 CFR 50.54(a) / EN-QV-104)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Fire Protection Program (FPP) [Includes the Fire Safety Analysis/Fire Hazards Analysis (FSA/FHA)] OL Condition, 10 CFR 50.48 / EN-DC-128)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Emergency Plan (10 CFR 50.54(q) / EN-EP-305)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Emergency Plan, 10CFR50.54(q) screen and evaluation completed.
Environmental Protection Plan (Appendix B of the OL, Environmental Evaluation / EN-EV-115, EN-EV-117, EN-LI-103)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Security Plan and Cyber Security Plan (10 CFR 50.54(p) / EN-NS-210 or contact the site Security / IT Dept.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Operating License (OL) / Technical Specifications (TS) (10 CFR 50.90 / EN-LI-103)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TS Bases (10 CFR 50.59 / EN-LI-100 / EN-LI-101)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Technical Requirements Manual (TRM) (Including TRM Bases) (10 CFR 50.59 / EN-LI-100 / EN-LI-101)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Core Operating Limits Report (COLR), and Pressure and Temperature Limits Report (PTLR) (TS Administrative Controls, EN-LI-113, EN-LI-100, EN-LI-101)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Offsite Dose Calculation Manual (ODCM) (TS Administrative Controls or 10 CFR 50.59 / EN-LI-113 or EN-LI-100 / EN-LI-101)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Updated Final Safety Analysis Report (UFSAR) (10 CFR 50.71(e) / EN-LI-113, EN-LI-100, EN-LI-101)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Storage Cask Certificate of Compliance (10 CFR 72.244 / EN-LI-113)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Cask FSAR (CFSAR) (Including the CTS Bases) (10 CFR 72.70 or 72.248 / EN-LI-113, EN-LI-100, EN-LI-112)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
10 CFR 72.212 Evaluation Report (212 Report) (10 CFR 72.48 / EN-LI-100, EN-LI-112)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Orders (10 CFR 50.90 / EN-LI-103 or as directed by the Order)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Commitments and Obligations (EN-LI-110)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Site Specific CFR Exemption (10 CFR 50.12, 10 CFR 55.11, 10 CFR 55.13, 10 CFR 72.7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

*Contact the site Regulatory Assurance Department if needed.

IF any box is checked "Yes," **THEN** ensure that any required regulatory reviews are performed in accordance with the referenced procedures. Prepare an LBDCR per procedure EN-LI-113 if a LBD is to be changed, and document any affected sections or the LBDCR #. Briefly discuss how the LBD is affected in Section VII.A.

Sheet 4 of 7

V. 10 CFR 50.59 / 10 CFR 72.48 APPLICABILITY

Can the proposed activity be dispositioned by one of the following criteria? Check the appropriate box (if any).

<input type="checkbox"/>	An approved, valid 50.59/72.48 Evaluation covering associated aspects of the proposed activity already exists. Reference 50.59/72.48 Evaluation # _____ (if applicable) or attach documentation. Verify the previous 50.59/72.48 Evaluation remains valid.
<input type="checkbox"/>	The NRC has approved the proposed activity or portions thereof <u>or</u> a license amendment being reviewed by the NRC addresses the proposed activity. Reference the approval document: _____
<input checked="" type="checkbox"/>	<p>The proposed activity is controlled by one or more specific regulations.</p> <p>Examples of programs controlled by specific regulations are:</p> <ul style="list-style-type: none"> • Maintenance Rule (50.65) (EN-DC-203) • Quality Assurance Program (10 CFR 50 Appendix B) (EN-QV-104) • Security Plan [50.54(p)] (EN-NS-210) • Emergency Plan [50.54(q)] (EN-EP-305) • Fire Protection Program (operating license condition) • Inservice Inspection Program (50.55a) (EN-DC-332) • Inservice Testing Program (50.55a) (EN-EC-351) <p>See NEI 96-07 Section 4.1 for additional guidance on specific regulations.</p> <p>Reference the controlling specific regulation(s): _____ 10CFR50.54(q) _____</p>

IF the entire proposed activity can be dispositioned by the criteria in Section V, **THEN** 50.59 and 72.48 Screenings are not required. Proceed to Section VII and provide basis for conclusion in Section VII.A.

Otherwise, continue to Section VI to perform a 50.59 and/or 72.48 Screening, or perform a 50.59 and/or 72.48 Evaluation in accordance with EN-LI-101 and/or EN-LI-112.

Changes to the IPEC Unit 1 Decommissioning Plan are to be evaluated in accordance with the 50.59 process, as allowed by the NRC in a letter to IPEC dated January 31, 1996. [IPEC-1 Letter RA960014]

VI. 50.59 / 72.48 SCREENING REVIEW

VI.A 50.59/72.48 SCREENING (Check the appropriate boxes.)

<input type="checkbox"/>	<p>10 CFR 50.59 Screening criteria are met. [10 CFR 50.59(c)(1)]</p> <p>The proposed activity meets all of the following criteria:</p> <ul style="list-style-type: none"> • Does not <u>adversely affect</u> the design function of an SSC as described in the UFSAR; <u>AND</u> • Does not <u>adversely affect</u> a method of performing or controlling a design function of an SSC as described in the UFSAR; <u>AND</u> • Does not <u>adversely affect</u> a method of evaluation that demonstrates intended design function(s) of an SSC will be accomplished as described in the UFSAR; <u>AND</u> • Does not involve a test or experiment not described in the UFSAR.
<input type="checkbox"/>	<p>The proposed activity does not involve structures, systems, or components controlled by 10 CFR 50.59.</p>
<input type="checkbox"/>	<p>10 CFR 72.48 Screening criteria are met. [10 CFR 72.48(c)(1)] (Applicable to sites with an ISFSI)</p> <p>The proposed activity meets all of the following criteria:</p> <ul style="list-style-type: none"> • Does not <u>adversely affect</u> the design function of an SSC as described in the CFSAR; <u>AND</u> • Does not <u>adversely affect</u> a method of performing or controlling a design function of an SSC as described in the CFSAR; <u>AND</u> • Does not <u>adversely affect</u> a method of evaluation that demonstrates intended design function(s) of an SSC will be accomplished as described in the CFSAR; <u>AND</u> • Does not involve a test or experiment not described in the CFSAR.
<input type="checkbox"/>	<p>The proposed activity does not involve structures, systems, or components controlled by 10 CFR 72.48.</p>

IF either of the 50.59 or 72.48 Screening criteria are met, THEN complete VI.B below as appropriate and proceed to Section VII.

IF the proposed activity does not meet the applicable criteria, THEN perform a 50.59 or 72.48 Evaluation in accordance with EN-LI-101 or EN-LI-112, as appropriate, attach a copy of the Evaluation to this form, and proceed to Section VII.

IF the activity does not involve systems, structures, or components controlled by 10 CFR 50.59 or by 10 CFR 72.48, THEN a 50.59 or 72.48 Screening is not required, as appropriate, and proceed to Section VII.

VI.B BASIS

Provide a clear, concise basis for determining the proposed activity may be screened out such that a third-party reviewer can reach the same conclusions. Refer to NEI 96-07 Section 4.2 for guidance. Provide supporting documentation or references as appropriate.

VII. REGULATORY REVIEW SUMMARY

VII.A GENERAL REVIEW COMMENTS (Provide pertinent review details and basis for conclusions if not addressed elsewhere in form.)

The Indian Point Energy Center Emergency Plan (Plan), Revision 14-01 (MERLIN 16), describes the emergency preparedness program for the Indian Point Energy Center Units 1, 2 and 3 Generating Stations. The Plan outlines the basis for response actions that would be implemented in an emergency. This revision incorporates changes based on the annual review, including additional detail regarding Emergency Response Facilities and support facilities, Evacuation Time Estimates (ETE) updates, Protective Action Recommendation changes in support of NUREG-0654 Supplement 3, clarification of various sections in support of NRC Emergency Planning Rule Changes, and numerous minor clarifications and editorial changes. In all cases, no change has resulted in a reduction in effectiveness of the Plan. Specific details regarding each change are included in the 10 CFR 50.54(q) Screen and Evaluation and associated Revision Matrix. The overall 10CFR50.54(q) Evaluation conclusion determined that the proposed changes to the EPLAN Rev 14-01, continue to meet the planning standards outlined in 10 CFR 50.47(b)(8), (10) and (24). This revision does not represent a reduction in effectiveness to the IPEC Emergency Plan and can be incorporated without prior NRC approval.

See completed 10 CFR 50.54(q) Screen and Evaluation.

VII.B CONCLUSIONS

1. Is a change to an LBD being initiated? Yes
IF "Yes," THEN enter the appropriate change control process and include this form with the change package. No
2. Is a 10 CFR 50.59 Evaluation required? Yes
IF "Yes," THEN complete a 50.59 Evaluation in accordance with EN-LI-101 and attach a copy to the change activity. No
3. Is a 10 CFR 72.48 Evaluation required? Yes
IF "Yes," THEN complete a 72.48 Evaluation in accordance with EN-LI-112 and attach a copy to the change activity. No

VIII. SIGNATURES¹

Preparer:

ANTHONY E. AMBROSE / [Signature] / Energy / Em. Prog. / 11/9/14
Name (print) / Signature / Company / Department / Date

Reviewer:

Lori Glander / [Signature] / Energy / IPEC / 11-13-14
Name (print) / Signature / Company / Department / Date

Process Applicability Exclusion

Site Procedure

Champion or
Owner:

Name (print) / Signature / Company / Department / Date

Upon completion, forward this PAD form to the appropriate organization for record storage. If the PAD form is part of a process that requires transmittal of documentation, including PAD forms, for record storage, then the PAD form need not be forwarded separately.

¹ The printed name, company, department, and date must be included on the form. Signatures may be obtained via electronic processes (e.g., PCRS, ER processes, Asset Suite signature), manual methods (e.g., ink signature), e-mail, or telecommunication. If using an e-mail, attach it to this form.

**IPEC IMPLEMENTING PROCEDURE
PREPARATION, REVIEW, AND APPROVAL**

IP-SMM-AD-102 Rev: 9

Page 34 of 41

ATTACHMENT ERROR! REFERENCE SOURCE NOT FOUND. IPEC PROCEDURE REVIEW AND APPROVAL

(Page 1 of 1)

Procedure Title: Emergency Plan

Procedure No: IPEC-EP_Existing Rev: 13-01 New Rev: 14-01 DRN/EC No: 14-01176

<u>Procedure Activity</u> (MARK Applicable)	<input type="checkbox"/> Converted To IPEC, Replaces:	<u>Temporary Procedure Change</u> (MARK Applicable)
<input type="checkbox"/> NEW PROCEDURE	Unit 1 Procedure No: _____	<input type="checkbox"/> EDITORIAL Temporary Procedure Change (Enter Step Number in Revision Summary)
<input type="checkbox"/> GENERAL REVISION	Unit 2 Procedure No: _____	<input type="checkbox"/> ADVANCE Temporary Procedure Change
<input checked="" type="checkbox"/> PARTIAL REVISION	Unit 3 Procedure No: _____	<input type="checkbox"/> CONDITIONAL Temporary Procedure Change Terminating Condition: _____
<input type="checkbox"/> EDITORIAL REVISION		
<input type="checkbox"/> VOID PROCEDURE		
<input type="checkbox"/> SUPERSEDED		
<input type="checkbox"/> RAPID REVISION	Document in Microsoft Word: <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> VOID DRN/TPC No(s): _____

Revision Summary N/A - See Revision Summary page. _____

Refer to attached summary of changes

Implementation Requirements

Implementation Plan? Yes No Formal Training? Yes No Special Handling? Yes No

RPO Dept: Emergency Planning Writer (Print Name/ Ext/ Sign): Antonio Iraola Mason / 7704 / 11/7/14

Review and Approval (Per Attachment Error! Reference source not found., IPEC Review And Approval Requirements)

1. Technical Reviewer: Anthony Ambrose [Signature] / 11/7/14
(Print Name/ Signature/ Date)

2. Cross-Disciplinary Reviewers:
Dept: _____ Reviewer: _____
(Print Name/ Signature/ Date)

Dept: _____ Reviewer: _____
(Print Name/ Signature/ Date)

3. RPO Responsibilities: Lori Glander * [Signature] / 11-13-14
(Print Name/ Signature/ Date)

PAD required and is complete (PAD Approver and Reviewer qualifications have been verified)

Previous exclusion from further LI-100 Review is still valid

PAD not required due to type of change

4. Non-Intent Determination Complete: _____
(Print Name/ Signature/ Date)

NO change of purpose or scope
NO reduction in the level of nuclear safety
NO voiding or canceling of a procedure, unless requirements are incorporated into another procedure or the need for the procedure was eliminated via an alternate process

NO change to less restrictive acceptance criteria
NO change to steps previously identified as commitment steps
NO deviation from the Quality Assurance Program Manual
NO change that may result in deviations from Technical Specifications, FSAR, plant design requirements, or previously made commitments

5. On-Shift Shift Manager/CRS: _____
(Print Name/ Signature/ Date)

6. User Validation: User: _____ Validator: _____

Emergency Planning Document Change Checklist Form

(All sections must be completed, N/A or place a check on the line where applicable)

Section 1

Doc/Procedure Type: (circle one) Administrative / Implementing / EPLAN

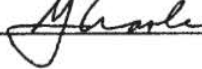
Doc/Procedure No: EPLAN C/A: Yes ___ No X C/A No. N/A Due Date: _____

Doc/Procedure Title: EPLAN Rev No: 14-01 Rev Distribution Date: 12/3/2014

Reason for EPDCC: _____ Revision X Cancel ___ Date of EPDCC: 11/12/2014

Section 2

Change Description

1. Originator: Antonio Iraola 
2. Class of Change: Technical Correction ___ New Commitment ___ Other X ___
3. Page numbers affected and reason for change: Refer to attached matrix of changes
4. Emergency Planning Documents Affected: None
5. Emergency Planning Procedures Affected: None
6. References: Other Procedure(s) # _____ Regulatory Document # _____
Other: _____
7. Reviewed training requirements with department training coordinator N/A ___ date _____
8. The following are complete, or are not applicable and are so marked.
Tech Review X 50.54q X ENN-LI-100 X PL-155 n/a ___
SMM-AD-102 X Manager approval X SRC n/a ___
9. Both table of contents and transmittals are complete _____ date _____
10. Approved doc/procedure delivered to Document Control for distribution _____ date _____
11. Position Binders updated if applicable _____ date _____
12. Copy of EPDCC and document/procedure placed in EP file _____ date _____

IPCC Emergency Plan Revision 14-01 (Merger Revision 16) REVISION MATRIX

Change No.	Previous Version	New Version	Editorial Change Per Reg. Guide 1.219?	Effect on 10 CFR 50.47(b) Planning Standards or NUREG-0654 program elements? Justify if NO.
1. Cover page	Rev 13-01	Rev 14-01	YES	NO- This is an editorial change to the Revision number and effective date. This change does not change the meaning or intent of a description, does not change facilities or equipment, and does not change a process. No further evaluation is required for this change.
2. Section E Page E-6	Rev 13-01: "In a General Emergency the notification includes, at a minimum, a recommendation for evacuation of the general public within the two (2) mile ring of Indian Point Energy Center and five (5) miles downwind, and sheltering of the remainder of the 10 mile Emergency Planning Zone and implementation of the NY State KI plan."	Rev 14-01: "In a General Emergency the notification includes, at a minimum, a recommendation for evacuation of the general public within the two (2) mile ring of Indian Point Energy Center and five (5) miles downwind, and implement the NY State KI plan. All remaining areas should monitor the Emergency Alert System."	NO	YES – Note: This item is the same subject as item # 9 included in this matrix.
3. Section H Page H-1 Second Paragraph		Add the following bullet: • Alternative Technical Support Center/Operations Support Center (joint facility)	NO	YES
4. Section H Page H-2 TSC Fourth Paragraph	In declaring the facility operational the manger....	In declaring the facility operational the manager....	YES	NO- Editorial- changed the spelling of the word manager. This change does not change the meaning or intent of a description, does not change facilities or equipment, and does not change a process. No further evaluation is required for this change.

IPEC Emergency Plan Revision 14-01 (Merim Revision 16) REVISION MATRIX

Change No.	Previous Version	New Version	Editorial Change Per Reg. Guide 1.219?	Effect on 10 CFR 50.47(b) Planning Standards or NUREG-0654 program elements? Justify if NO.
<p>7. Section I Page I-5 First Paragraph</p>	<p>The computer will generate release rates, projected dose rates and doses to the whole body and thyroid as well as downwind noble gas and particulate concentrations via the plume exposure pathway.</p>	<p>The computer will generate release rates, projected dose rates and doses to the whole body and thyroid as well as downwind noble gas and particulate concentrations via the plume exposure pathway.</p> <p><u>Add next sentence:</u> "The computer software also has the capability of performing multiple-accident dose assessment involving simultaneous releases from one or both of the Indian Point Energy Center units".</p>	<p>NO</p>	<p>NO- For multiple-accident dose assessment, the MIDAS computer software uses the same modeling that is used for determining single-accident release rates, projected downwind concentrations, dose rates and integrated doses. The MIDAS multiple-accident capability allows the individual contributions from up to five simultaneous releases to be calculated and summed.</p> <p>This feature was added to MIDAS to facilitate assessment activities potentially affecting both units. The only change to the software was how it calculates and displays the combined map displays and dose summary information. Note: A 50.54q was performed on the MIDAS software change Revision 1.5.16.010714 and approved on Jan. 8, 2014.</p> <p>Inclusion of the multiple release capabilities of the software is an enhancement to the plan.</p> <p>This change does not change the meaning or intent of a description, does not change facilities or equipment, and does not change a process. No further evaluation is required for this change.</p>

IPEC Emergency Plan Revision 14-01 (Merri Revision 16) REVISION MATRIX

Change No.	Previous Version	New Version	Editorial Change Per Reg. Guide 1.219?	Effect on 10 CFR 50.47(b) Planning Standards or NUREG-0654 program elements? Justify if NO.
<p>8. Section J Page J-3 Last Paragraph</p>	<p>Protective action recommendations for the plume exposure pathway are based on the Environmental Protection Agency (EPA) Protective Action Guides (PAGs) discussed in EPA-400-R-92-001 - "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents"</p>	<p>Protective action recommendations for the plume exposure pathway are based on the Environmental Protection Agency (EPA) Protective Action Guides (PAGs) discussed in EPA-400-R-92-001 - "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" <u>Add to sentence:</u> " and NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, Guidance for Protective Action Strategies".</p>	<p>NO</p>	<p>YES- See change 10</p>
<p>9. Section J Page J-4 Second Paragraph</p>	<p>"Recommendations issued by Indian Point Energy Center at a General Emergency based on plant conditions include as a minimum, evacuation in the two (2) mile radius and five (5) miles downwind and advising the remainder of the EPZ population to shelter and listen to EAS messages for further direction."</p>	<p>"Recommendations issued by Indian Point Energy Center at a General Emergency based on plant conditions include as a minimum, evacuation in the two (2) mile radius and five (5) miles downwind, implement the NY State KI plan, and advising the remainder of the EPZ population to monitor EAS messages for further direction."</p>	<p>NO</p>	<p>YES – Note: This item is the same subject as item # 2 included in this matrix.</p>

IPEC Emergency Plan Revision 14-01 (Merim Revision 16) REVISION MATRIX

Change No.	Previous Version	New Version	Editorial Change Per Reg. Guide 1.219?	Effect on 10 CFR 50.47(b) Planning Standards or NUREG-0654 program elements? Justify if NO.
<p>10. Section J Page J-4 2nd Paragraph</p>		<p><u>Add as last sentence in paragraph:</u> "The Indian Point Entergy Center's rationale and methodology for plant-based and dose-based protective action recommendations has been coordinated with local and state response organizations as required by NUREG-0654, Supplement 3".</p>	NO	<p>YES - The coordination of protective action implementation with offsite response organizations was based on the implementation of NRC EP Rule Changes and the promulgation of NUREG-0654 Supplement 3. The guidance of Supplement 3 provides an acceptable method to comply with Appendix E paragraph 3 in the use of evacuation time estimates in the formulation of protective action recommendations (PARs) for the plume exposure emergency planning zone, and provides guidance for the provisions of 10 CFR 50.47(b)(10) in the development of a range of PARs.</p>
<p>11. Section K Page K-4 Sixth Paragraph</p>	<p>In the event that decontamination of onsite personnel locally is not possible, personnel will be sent to a county reception center for monitoring and decontamination.</p>	<p>In the event that decontamination of onsite personnel locally is not possible, personnel will be sent to a county emergency worker monitoring and decontamination center for monitoring and decontamination.</p>	NO	<p>NO - The same facility previously referred to as a "county reception center" which is located at the Westchester Co. Fire Training Center, Valhalla, NY, was incorrectly described in Section K. The facility should have been referred to as an emergency worker monitoring and decontamination center. Processes for radiological monitoring and decontamination of personnel, vehicles and equipment are the same. There is no change to the referenced facility location or related processes.</p> <p>This change does not change the meaning or intent of a description, does not change facilities or equipment, and does not change a process. No further evaluation is required for this change.</p>
<p>12. Section N Page N-1 Paragraph 1.b.</p>	<p>Six-Year Plan (mentioned twice)</p>	<p>Eight- Year Exercise Cycle Plan</p>	NO	<p>YES- The Six year plan has been revised to an Eight year plan based on the implementation of NRC EP Rule Changes. It has been specifically changed in 10CFR Part 50, Appendix E, Section IV.F.2.j</p>

IPEC Emergency Plan Revision 14-01 (Merlin Revision 16) REVISION MATRIX

Change No.	Previous Version	New Version	Editorial Change Per Reg. Guide 1.219?	Effect on 10 CFR 50.47(b) Planning Standards or NUREG-0654 program elements? Justify if NO.
	<p>Also: Remove the wording "Drill/Exercise Type and Frequency Plan" in 2 locations and remove the wording "at least once in each eight-year period. At least one exercise every eight years is started between 6:00 pm and 4:00 am."</p>			
<p>13. Section N Page N-3 Paragraph 2.f.second bullet</p>	<p>every six years</p>	<p>every eight years, in the Eight –Year Exercise Cycle Plan,</p>	<p>NO</p>	<p>YES- The Six year plan has been revised to an Eight year plan based on the implementation of NRC EP Rule Changes. It has been specifically changed in 10CFR Part 50, Appendix E, Section IV.F.2.j</p>
<p>14. <u>Appendix 2:</u> <u>Letters of Agreement</u></p> <p>Page: Appendix 2-1</p>	<p>Previous revision contained "10. City of Peekskill Fire Department" letter of agreement. This letter is being removed as the Peekskill Fire Department is no longer being used as a command center. This was moved to the Verplanck Fire District. The Verplanck Fire District letter of agreement, already in the plan, reflects additional wording commensurate with an area designated for a command staff and required equipment to support an emergency response.</p>	<p>The City of Peekskill Fire Department letter of agreement is removed and no longer required.</p> <p>The Verplanck Fire District letter of agreement reflects additional wording which describes the additional designated areas for a command staff and equipment to support an emergency response for IPEC.</p>	<p>NO</p>	<p>YES- The offsite TSC/OSC staging area was moved from one location/jurisdiction (Peekskill) to another location jurisdiction (Verplanck). This new location serves as the offsite alternative TSC/OSC.</p> <p>In addition, the Peekskill Fire Department LOA is no longer needed and the Verplanck Fire District LOA was enhanced to include the wording required to allow for the facility to be used as a staging area for IPEC employees as well as for storage of equipment and as an area for a command staff. This resulted in the replacement of the LOAs.</p>

IPEC Emergency Plan Revision 14-01 (Merit Revision 16) REVISION MATRIX

Change No.	Previous Version	New Version	Editorial Change Per Reg. Guide 1.2197	Effect on 10 CFR 50.47(b) Planning Standards or NUREG-0654 program elements? Justify if NO.
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<p>And</p> <p><u>Appendix 2:</u> <u>Letters of Agreement</u> Page: Appendix 2-2</p>	<p>Letters of Agreements (LOAs) dates have been updated and only City of Peekskill Fire Department" letter of agreement as noted above.</p>	<p>Refer to the new and revised LOAs for the new dates.</p>	<p>NO</p>	
<p>15. App. 5 Page 5-1</p>	<p>Scenario Table: 13 – Autumn/Winter 14 – Spring/Summer, Midweek/Weekend, Midday, Good, West Point Graduation at Croton Point Park</p>	<p>Scenario Table: 13 – Autumn/Winter 14 – Spring/Summer, Midweek/Weekend, Midday, Good, West Point Graduation Event at Croton Point Park</p>	<p>NO</p>	<p>YES - The scenario type table headers were changed to agree with the scenario type table headers in the ETE document (KLD Report TR-557, page 4-8).</p>
<p>16. App. 5 Page 5-2, 2nd paragraph</p>	<p>Following federal guidelines, the IPEC EPZ is subdivided into 37 Protective Action Areas</p>	<p>Following federal guidelines, the IPEC EPZ is subdivided into 37 38 Protective Action Areas</p>	<p>NO</p>	<p>YES - IPEC 10 mile EPZ is divided into 38 Protective Action Areas (PAA). The Hudson River is one of the 38 PAAs. The 2013 ETE only considered 37 of the 38 because the Hudson River is considered a PAA with no road network to perform an evacuation estimate. During the 2013 revision of the E-Plan the number of PAAs was changed from 38 to 37 to match the number of PAAs included in the ETE. The Hudson River is still included as a PAA and should still be included in the total number of PAAs.</p>

IPEC Emergency Plan Revision 14-01 (Merlin Revision 16) REVISION MATRIX


Change No.	Previous Version	New Version	Editorial Change Per Reg. Guide 1.219?	Effect on 10 CFR 50.47(b) Planning Standards or NUREG-0654 program elements? Justify if NO.
<p>17. App. 5 Page 5-3, II PROTECTIVE ACTION AREAS</p>	<p>The plume exposure EPZ for the IPEC has been subdivided into 37 discrete Protective Action Areas ...</p>	<p>The plume exposure EPZ for the IPEC has been subdivided into 37 38 discrete Protective Action Areas</p>	<p>NO</p>	<p>YES – See Change 16</p>
<p>18. App. 5 Page 5-4</p>	<p>Table 1: 3rd line – Northwestern Town of Ramapo</p>	<p>Table 1: 3rd line – Northwestern Northeastern Town of Ramapo</p>	<p>NO</p>	<p>NO- The ETE was revised in 2013 with the new Protective Action Areas (PAA). The PAA name for the PAA discussed in this change is "Northeastern Town of Ramapo". The name of this PAA has not changed from 2013. The name of the PAA was incorrectly labelled in the E-Plan because although the proper name is <u>Northeastern</u> Town of Ramapo as reflected in the 2013 ETE, it physically looks like it is in the <u>Northwestern</u> part of the town.</p> <p>This change does not change the meaning or intent of a description, does not change facilities or equipment, and does not change a process. No further evaluation is required for this change.</p>
<p>19. App. 5 Pages 5-11 and 5-12</p>	<p>Table 6-A, 6-B and 6-C: Evacuation Time Estimates for the 2-Mile Region, 5-Mile Region and Full EPZ</p>	<p>Revised multiple ETEs to be consistent with ETEs in current ETE Addendum (KLD Report TR-557)</p>	<p>NO</p>	<p>YES- All ETEs now consistent with ETEs in current ETE document (KLD Report TR-557, pages 5-11 and 5-16)</p> <p>All ETE simulations were rerun in 2014 while preparing the ETE Addendum (KLD Report TR-557).</p>

IPEC Emergency Plan Revision 14-01 (Merim Revision 16) REVISION MATRIX

Change No.	Previous Version	New Version	Editorial Change Per Reg. Guide 1.219?	Effect on 10 CFR 50.47(b) Planning Standards or NUREG-0654 program elements? Justify if NO.
				<p>During the 2014 simulations, the following changes were made: (1) Node 1186 at the intersection of US 6 and Route 52 in Carmel – turns were blocked that allow access to US 6 westbound. The current county traffic control plan blocks these turns. They were not input correctly in the 2012 simulations;</p> <p>(2) Node 1190 at the intersection of Peekskill Hollow Rd and Route 301 near Carmel, NY – changed to a TCP. This was a stop sign for Peekskill Hollow Rd and no control for Route 301 in the 2012 ETE report (KLD TR-537). While running the 2014 simulations of the keyholes consisting of the 2-mile radius and 10 miles downwind, traffic congestion at this intersection lasted for more than an hour longer than any other intersection in the study area. Changing this to a TCP resulted in the traffic congestion clearing significantly earlier;</p> <p>(3) The commuter college traffic (West Point, Pace University, Mercy College, and Ohr Hamier Seminary School) discussed in Section 3.1.2 of the 2012 ETE report (KLD TR-537) was mistakenly zeroed out in the input streams for the 2012 simulations. This resulted in as many as 2,419 (see Table 6-4 in TR-537) vehicles not being included in the 2012 simulations depending on the scenario.</p> <p>The 3 aforementioned changes to the input streams resulted in changes to the ETE:</p> <ul style="list-style-type: none"> • 2-mile region (R01) – no change • 5-mile region (R02) – changes in 90th percentile ETE ranging from -15 to +20 minutes; no change in 100th percentile ETE

IPEC Emergency Plan Revision 14-01 (Merim Revision 16) REVISION MATRIX

Change No.	Previous Version	New Version	Editorial Change Per Reg. Guide 1.219?	Effect on 10 CFR 50.47(b) Planning Standards or NUREG-0654 program elements? Justify if NO.
				<ul style="list-style-type: none"> • Full EPZ (R03) – changes in 90th percentile ETE from -30 to +10 minutes; changes in 100th percentile ETE from -40 to +20 minutes • Keyholes – 2 around, 5 down – no change • Keyholes – 5 around, 10 down – no change in 90th percentile ETE; changes in 100th percentile ETE ranging from -30 to +30 minutes <p>The largest overall ETE change is a decrease of 40 minutes for the roadway impact scenario (Scenario 15) for the Full EPZ. In the roadway impact scenario, a lane is closed on the Taconic Parkway northbound in Putnam County. Many of the vehicles evacuating northbound on Peekskill Hollow Road use the access ramp to the Taconic Parkway northbound. With a single lane closed on the Taconic, congestion on this ramp is significant. Due to the new TCP at the intersection of Peekskill Hollow Rd and Route 301, more vehicles opt to stay on Peekskill Hollow Rd rather than taking the Taconic and vehicles are able to evacuate the EPZ 40 minutes faster than in the 2012 simulations.</p> <p>These changes in ETE have no impact on the Protective Action Recommendation (PAR) updates done in 2014 since the ETE for the 2-mile region and the keyholes consisting of the 2-mile radius and 5 miles downwind were not changed. The ETE was developed in accordance with NUREG/CR-7002.</p>

 IPEC EMERGENCY PLAN	NON-QUALITY RELATED DOCUMENT INFORMATION USE	IPEC-EP	Merlin Rev 16
		14-01	

Indian Point Energy Center

Emergency Plan

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Indian Point Energy Center Emergency Plan

Part 1: INTRODUCTION

Section A: Purpose

As required by the licensing conditions set forth by the Nuclear Regulatory Commission (NRC) this document describes the emergency preparedness program for the Entergy Indian Point Units 1, 2 and 3 Generating Stations (Indian Point Energy Center). The philosophy that guides the development and maintenance of this program is the protection of the health and safety of the general public in the communities around the Indian Point Energy Center units and the personnel who work at the plant.

The Indian Point Energy Center Emergency Plan (Plan) outlines the basis for response actions that would be implemented in an emergency. This document is not intended to be used as a procedure. Detailed Emergency Plan implementing procedures are maintained separately and used to guide those responsible for implementing emergency actions.

This Plan documents the methods by which Entergy's Emergency Preparedness Programs meet the criteria set forth in Title 10 of the Code of Federal Regulations (CFR), Part 50, Section 47(b) and Appendix E.

The Plan is applicable to plant conditions that may cause or may threaten to cause radiological hazards at Units 1, 2 or 3 affecting the health and safety of workers or the public or resulting in damage to property. Unit 1 is defueled and only those areas of Unit 1 that either store or process radioactive materials (the Fuel Handling Building and waste storage/process areas in the Chemical Systems Building and the Integrated Liquid Radwaste Systems Building) were considered in evaluating radiological hazards.

This Plan is solely dedicated to Indian Point Energy Center and includes details of how Entergy utilizes its resources to assist the plant operating staff during an emergency situation.

Section B: Background

Description of the Indian Point Energy Center

Indian Point Energy Center (IPEC) is located on the east bank of the Hudson River about 24 miles north of the New York City boundary line, at Indian Point, Village of Buchanan, in upper Westchester County, New York State. The IPEC Site is about 2.5 miles southwest of the City of Peekskill; 8.3 miles south of West Point; 1.5 miles northeast of the Lovett generating station site; 4.6 miles north of the Bowline Point generating station site; and 2.3 miles north of Montrose Point. The Site is approximately 239 acres and contains three pressurized water reactors owned by Entergy. Figures 1.B-1 and 1.B-2 are maps that show the general location of the Site and its environs within a 10-mile and 50-mile radius, respectively.

Exclusion Area

Entergy has the authority within the site boundary, called the Exclusion Area, to determine all activities including the exclusion or removal of personnel and property (see Figure 1.B-3).

Indian Point Energy Center Emergency Plan

There are no residences within the exclusion area nor are there any public highways or public railroads traversing the exclusion area.

One main and one alternate access roads service the exclusion area. Several other roads interconnect with these two roads. In the event of an evacuation, all vehicular traffic will be directed to the appropriate access road depending on the wind direction, and traffic would exit the site onto Broadway in Buchanan.

Protected Area

A Security fence marks the perimeter of the Protected Area of the site. Access beyond the fence is restricted to badged employees or escorted visitors. Metal and bomb detectors are located at the Protected Area entrance. All buildings related to plant functions are within the Protected Area security fence.

The independent spent fuel storage installation (ISFSI) is located within the Protected Area boundary for interim dry storage of spent fuel. The HOLTEC spent fuel storage casks are designed to ensure protection of public health and safety through use of physical barriers to guard against the uncontrolled release of radioactivity and through the use of shielding to minimize radiation dose to the public from both normal and off-normal conditions of operation. The analyses summarized in the HOLTEC Cask UFSAR demonstrate that under assumed accident conditions, the consequences of accidents challenging the integrity of the barriers will not exceed limits established in 10 CFR 72.106.

Population Distribution

Approximately 13,000 people live within a two mile radius, approximately 84,000 people live within a five-mile radius and approximately 300,000 within a ten-mile radius of the site based on the 2010 US Census population. A more detailed summary of population distribution can be found in Appendix 5 and the station's Evacuation Time Estimate Study.

Site Topography

The Indian Point Energy Center is surrounded on almost all sides by high ground with elevations ranging from 600 to 1000 feet above sea level. The general orientation of this mass of high ground is northeast to southwest. The Hudson River runs northeast to southwest at the Indian Point Energy Center location but turns sharply northwest approximately two miles north of the plant.

Steep, heavily wooded slopes flank the west bank of the Hudson: the Dunderberg and West Mountains to the northwest (elevation 1086 feet and 1257 feet, respectively) and Buckberg Mountain to the west southwest (elevation 793 feet). Further west are slightly higher peaks.

To the east of the site, peaks are generally lower: Spitzenberg and Blue Mountains average about 600 feet in elevation, and a weak, poorly defined series of ridges run in a north-northeast direction. The River south of the plant makes another sharp bend to the southeast and then widens as it flows past the towns of Croton and Haverstraw.

Plant

Unit 1 (615 MWt, defueled), Unit 2 (3216 Mwt) and Unit 3 (3189 Mwt). Figure 1.B-3 shows a general layout of the Site.

In a nuclear reactor system, containment is defined as the means of restricting, to sharply defined volumes, the distribution of radioactive materials that are in the process of nuclear fission. The IP-2 and IP-3 units have three containment barriers that exemplify the "Defense in Depth" philosophy.

The first or innermost of the barriers is the fuel rod. This encapsulates the fuel pellets that generate the heat energy and is designed to maintain its integrity for the anticipated core life.

The second containment barrier is the reactor pressure vessel. This pressure vessel contains the fuel rods, grouped into fuel assemblies, and the attached reactor coolant system which is comprised of four steam generators, four cooling pumps, pressurizer, and piping.

The third barrier, called the reactor containment structure, surrounds the reactor coolant system. The reactor containment is a steel-lined reinforced concrete cylinder with a hemispherical dome and a flat base. This outer containment is designed to withstand the internal pressure that accompanies a loss of coolant accident. The structure provides radiation shielding for both normal operations and accident conditions.

Section C: Scope

The primary hazard consideration at the Indian Point Energy Center is the potential unplanned release of radioactive material resulting from an accident at the site. The probability of such a release is considered very low due to plant design and strict operational guidelines enforced by the Nuclear Regulatory Commission (NRC). However, Federal regulations and common sense require that an emergency preparedness program exist for each commercial nuclear power station.

This Plan describes the response of Entergy personnel at the Indian Point Energy Center Site during emergencies. It identifies an IPEC Emergency Response Organization (ERO), describes facilities and equipment, assigns responsibilities and authorities and identifies procedures for responding to emergencies from minor injury to personnel to conditions having offsite radiological consequences. Implementing Procedures have been developed to implement this Plan. These procedures identify the elements of the ERO and the interface with supporting offsite organizations. In addition to the Implementing Procedures, (IP) Plan Administrative Directives (AD) have been developed to ensure proper maintenance of the program. A listing of procedures cross-referenced to sections of the Plan are contained in Appendix 3. Complete copies of the Plan Implementing Procedures are maintained in the Control Rooms, Technical Support Center, Emergency Operations Facility and Alternate Emergency Operations Facility. Additional copies of individual procedures are distributed as needed to support the ERO.

Indian Point Energy Center Emergency Plan

Plant operating, radiological control and security procedures were considered in the development of this Plan. Reference to these procedures is made where necessary. Plant operating and emergency procedures are available in the Control Rooms for use by the operating staff. Radiological control procedures are available for use by the Watch Radiation Protection personnel. Procedures that address security requirements during emergencies for the security force are contained in the Security Procedures and Safeguards Documents.

This Plan includes agreements made with offsite organizations that furnish support during emergencies. Copies of these agreements are contained in Appendix 2. Specific notification and direction instructions are incorporated into the implementing procedures where necessary.

Elements of the offsite emergency response are specified in the Emergency Plans of New York State, Westchester, Rockland, Putnam and Orange counties.

Section D: Planning Basis

The Plan, in conjunction with the implementing and administrative procedures, documents the methods by which the Entergy Emergency Preparedness Program meets the planning standards set forth in 10-CFR-50.47 (b) and the requirements of 10-CFR-50 Appendix E. Other applicable regulations, publications, and guidance were used (see Appendix 1, "References") along with site-specific documents to ensure consistency in the planning effort.

This plan was developed in coordination with the New York State Office of Emergency Management and local county Offices of Emergency Management. These organizations have complementary emergency response plans.

Indian Point Units 1&2 previously owned by Consolidated Edison and Indian Point Unit 3 previously owned by the New York Power Authority, were consolidated under one owner, Entergy Corporation in 2001. Much of the planning efforts prior to the consolidation were carried on as a joint venture between the previous owners. In order to further streamline processes, planning efforts and establish standard responses, this single Plan was developed.

This Plan was developed to respond to and minimize the onsite and offsite impact of an accident at Indian Point Energy Center. The interrelationship between the Site, Corporate, Federal, State and local government organizations is discussed. Protective measures within the exclusion area (onsite) are the responsibility of Entergy. Protective measures outside the exclusion area (offsite) are the responsibility of state and local government authorities. The Onsite and Offsite Emergency Organizations can respond to any incident or accident 24-hours every day. These emergency organizations consist of many subgroups. The responsibilities, authorities and interactions between the subgroups are discussed in Part 2, Section B of this Plan.

This Plan incorporates a classification system for emergencies and prescribes the recommended actions which are recommended to Offsite to be taken to protect the safety of the public, plant personnel and property both onsite and offsite. These actions are

Indian Point Energy Center Emergency Plan

contained in the Plan Implementing Procedures. The Plan addresses the responsibilities of personnel and the available resources.

The State and local government responses to plant-related emergencies outside the exclusion area are coordinated between the New York State Office of Emergency Management and the County Offices of Emergency Management as described in their respective Emergency Plans.

The response to an emergency occurs in three phases.

1. The first phase (initial) includes immediate operator actions to maintain or bring the plant to a safe shutdown condition, initiate action to protect onsite personnel, classify the emergency and notify plant personnel and the appropriate offsite authorities. This phase is conducted by watch personnel (staffing level 1, refer to Part 2 section B) with the assistance of other in-house personnel as needed.
2. The second phase (activation) includes actions to terminate the incident, monitor both onsite and offsite monitoring areas, assess the extent of any release of radioactivity, and disseminate the assessment (estimated exposure information) to offsite authorities. The second phase is performed under the direction of the Emergency Director at the EOF/AEOF. This phase includes augmenting the Onsite Emergency Organization with support from offsite.
3. The third phase (recovery) begins once the emergency is terminated and includes planned actions for re-entry by workers to restore the station to normal operation, assisting offsite authorities return the public evacuated from around the Site, and implementing post accident environmental sampling as needed. This phase is the responsibility of the Site Recovery Director.

Section E: Governmental Emergency Planning

Entergy works with Federal, State and Local government agencies to insure an integrated emergency response within the Emergency Planning Zones (Figures 1.B-1 and 1.B-2) located around the Indian Point Energy Center.

Section F: Emergency Plan Guidance and Criteria

The Indian Point Emergency Plan and related implementing procedures integrates guidance from several governmental and industry standards to provide the best protection of the health and safety of the public. See Appendix 1, References, for a list of documents used in development of this plan.

Section G: Assistance to Non-Entergy Planning Efforts

Entergy provides technical assistance and other assistance as required to State and Local Agencies who are involved in the emergency planning effort for Indian Point Energy Center.

Section H: Response Organization

This Plan and its associated implementing procedures outline Entergy's responsibilities for the protection of onsite persons. Specific responsibilities, organizations and program implementation are outlined in other sections of this Plan, its associated Implementing Procedures and supporting Administrative Directives.

Section I: Federal Response

The Federal Government has an integrated response plan in the event of a radiological emergency at any facility. Provisions are made within this Plan for the integration of appropriate elements of the federal assistance activities. Arrangements have been made to accommodate a federal response organization presence in the Entergy emergency response facilities as well as support communications between utility and federal emergency facilities. NRC response as described in NUREG-1472, "Concept of Operations: NRC Incident Response", was used in the development of the Plan as guidance to ensure coordination between Entergy and NRC EROs.

Section J: Form and Content of Plan

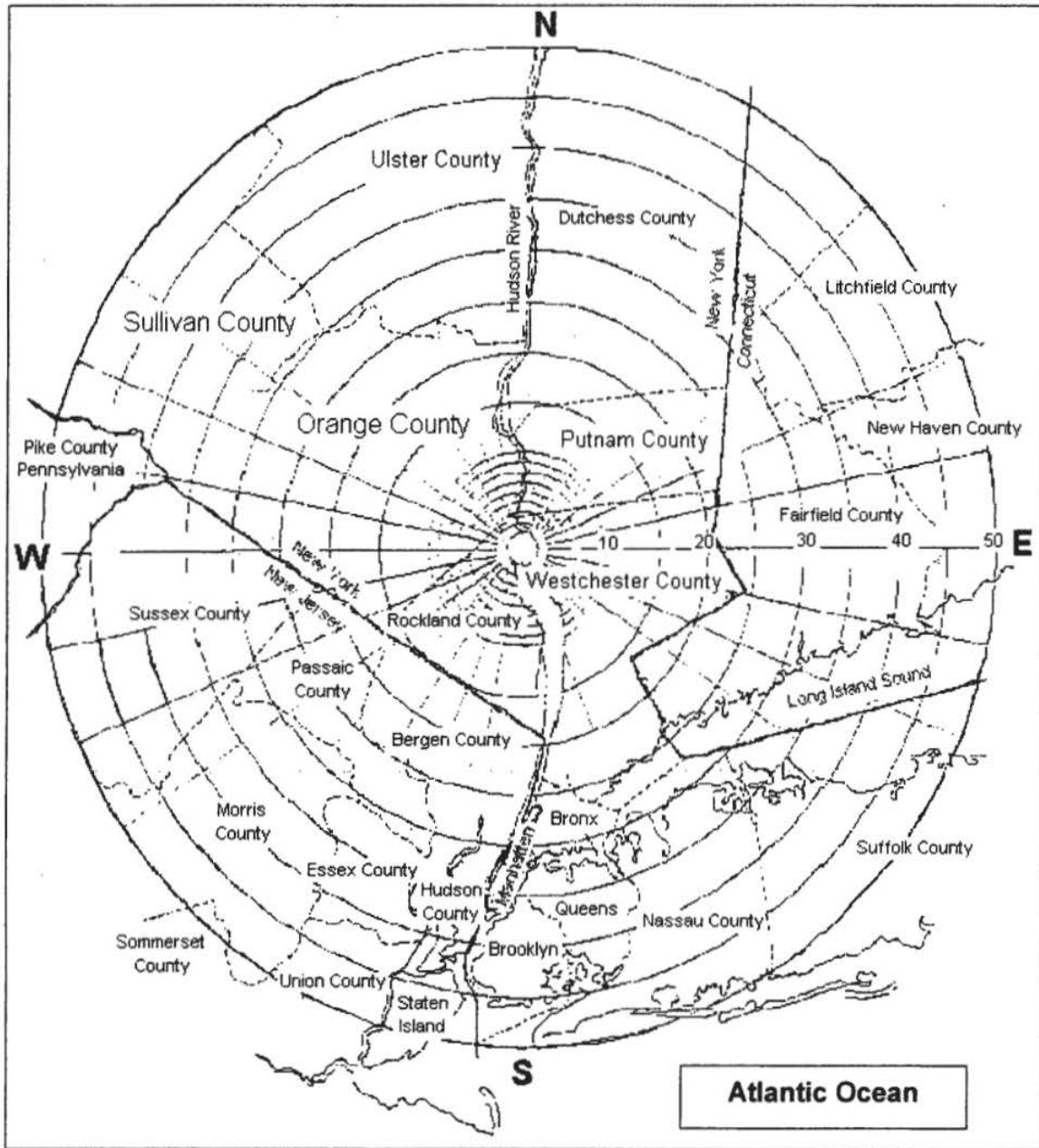
This Plan has been formatted similar to NUREG-0654, FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants", Revision 1.

Because this Plan is formatted in the same manner as the guidance document, no section cross-reference is needed.

An appendix is provided to cross reference Implementing Procedures and Administrative Procedures to sections of the Plan.

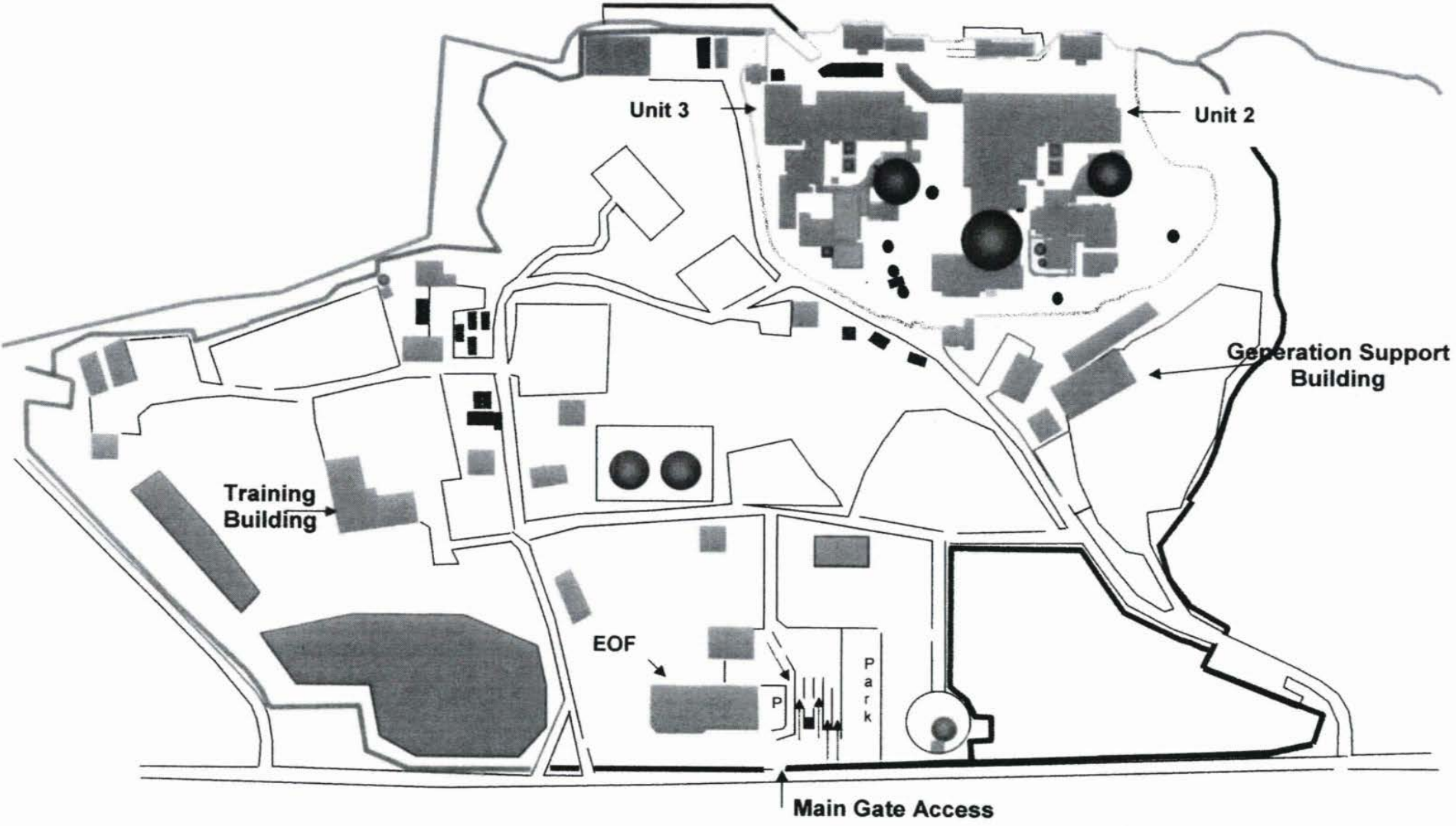
Indian Point Energy Center Emergency Plan

Figure 1.B-2
50 Mile Emergency Planning Zone



Indian Point Energy Center Emergency Plan
INDIAN POINT ENERGY CENTER SITE MAP

Figure 1.B-3



Part 2: PLANNING STANDARDS AND CRITERIA

Section A: Assignment of Responsibility

This section describes the primary responsibilities for emergency response by IPEC, Federal, State, and local organizations within the Indian Point Plume Exposure Pathway and the Ingestion Pathway Emergency Planning Zones (EPZs). Various supporting organizations are also described as well as staffing for initial and continuous response.

In the event of an emergency, as defined in Part 2, Section D, various Federal, State, and County organizations will be notified. This section identifies the principal State agency and other government agencies having planning and/or action responsibilities for emergencies, in the Westchester, Orange, Putnam and Rockland County areas of New York State.

1. Organizations

The relationships and the concept of operations for the organizations and agencies supporting a response in the Indian Point Emergency Planning Zones are as follows:

- a. Identified below are Federal, State, local, and private organizations that are involved in a response to an emergency at Indian Point Energy Center.

Federal Agencies

The Federal Radiological Emergency Response Plan (FRERP) outlines the statutory and regulatory responsibilities. The primary Federal response at Indian Point Energy Center supporting an emergency include:

- Nuclear Regulatory Commission (NRC), who act as technical/regulatory advisors to Indian Point Energy Center during an emergency. They provide Federal communications capabilities, coordination of Federal assistance, and assessment of onsite radiological incidents and potential offsite consequences.
- The U.S. Department of Energy operates a Radiological Assistance Plan from its regional office at Brookhaven, Long Island. The Radiological Assistance Plan, which specializes in radiation safety and medicine, will provide assistance to the Nuclear Facility Operator, the State or the county at their request. This assistance, which includes monitoring of the environment surrounding the site, is available twenty-four (24) hours a day by calling the contact phone number. The expected time of arrival is approximately 3 hours. The Emergency Director is authorized to request this assistance in the event it is necessary. Westchester County Airport, located approximately 30 minutes by automobile from the site, can supply facilities for air transportation.

Indian Point Energy Center Emergency Plan

- Federal Emergency Management Agency (FEMA), who coordinates the overall offsite Federal response and provides Federal resources and assistance to state and local governments. FEMA is a division of the Department of Homeland Security (DHS).
- Environmental Protection Agency (EPA), who assists with field radiological monitoring/sampling and non-plant, related recovery and re-entry guidance.
- During a radiation incident that could have offsite radiological consequences, the U.S. Coast Guard will assist by maintaining traffic control on the Hudson River. Coast Guard assistance is requested by and coordinated through New York State, the appropriate county, or FEMA.
- National Weather Service, who provides meteorological information to Indian Point Energy Center in the event that the onsite meteorological tower or monitoring instrumentation becomes inoperative.

New York State Agencies

- The agency responsible for emergency planning is the State Office of Emergency Management. The Chairman of the Disaster Preparedness Commission will assume the direction and coordination of the State response activities. The specific tasks and responsibilities assigned to various departments and agencies of the State are delineated in New York State's Radiological Emergency Preparedness Plan. Notification to the State of emergency conditions would be as indicated in Part 2, Section E.
- New York State has Emergency Operation Centers in Albany, Westchester and other areas in the state. All of the state EOC's are equipped with communication capability.

County Offices of Disaster and Emergency Services/Emergency Management

The four (4) counties that are involved in emergency response activities at the Indian Point Energy Center Site include:

- Westchester County, in which Indian Point Energy Center is located;
- Rockland County, on the west side of the Hudson River across from Indian Point Energy Center;
- Orange County, on the west side of the Hudson River, north of the plant. The closest boundaries of Orange County are approximately four (4) miles from Indian Point Energy Center.
- Putnam County, on the east side of the Hudson River, north of the plant. The closest boundaries of Putnam County are approximately four (4) miles from Indian Point Energy Center.

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Each county has an Office of Emergency Management. The Director of each of these offices, or their designee, will act as the County Emergency Operations Manager in the County. Bergen County is a host county that assists Rockland County in the event of an evacuation of the general public. The city of Peekskill takes direction from Westchester County and has its own Warning Point and Emergency Operation Center.

Emergency Operations Centers are where county managers direct and coordinate the County's response, under the authority of the Chief Executive of the County, for natural and man-made disasters. Notifications to the Counties of an Unusual Event, Alert, Site Area or General Emergency at Indian Point Energy Center would be as described in Part 2, Section E.

- b. During an emergency condition at an Alert, Site Area Emergency, or General Emergency level, the Indian Point Emergency Response Organization replaces the normal plant organization. Indian Point Energy Center concept of operations is to utilize the entire station staff and if needed the entire company (Entergy) resources to protect the health and safety of the public and station personnel during an emergency at the site. Part 2, Section B outlines the organizations established.
- c. Figure A-1 illustrates the interrelationships of the organizations involved with emergency planning for Indian Point Energy Center.
- d. The Shift Manager (or the Control Room Supervisor in his/her absence) is in charge of the Indian Point Energy Center emergency response until relieved by another qualified Emergency Director who is then in charge of the entire IPEC Emergency Response Organization.
- e. Continuously manned communication points have been identified for all agencies involved in the planning effort.

2. State and Local Functions and Responsibilities

The State, and local counties have Emergency Response Plans that specify the responsibilities and functions for the major agencies, departments, and key individuals of their emergency response organizations. This information is located in their respective Plans.

Along with the State of New York, the States of Connecticut, New Jersey and Pennsylvania are within the boundaries of the Emergency Planning Ingestion Pathway 50-mile radius. The specific response of these states is found in their respective Emergency Response Plans.

Indian Point Energy Center Emergency Plan

3. Agreements in Planning Effort

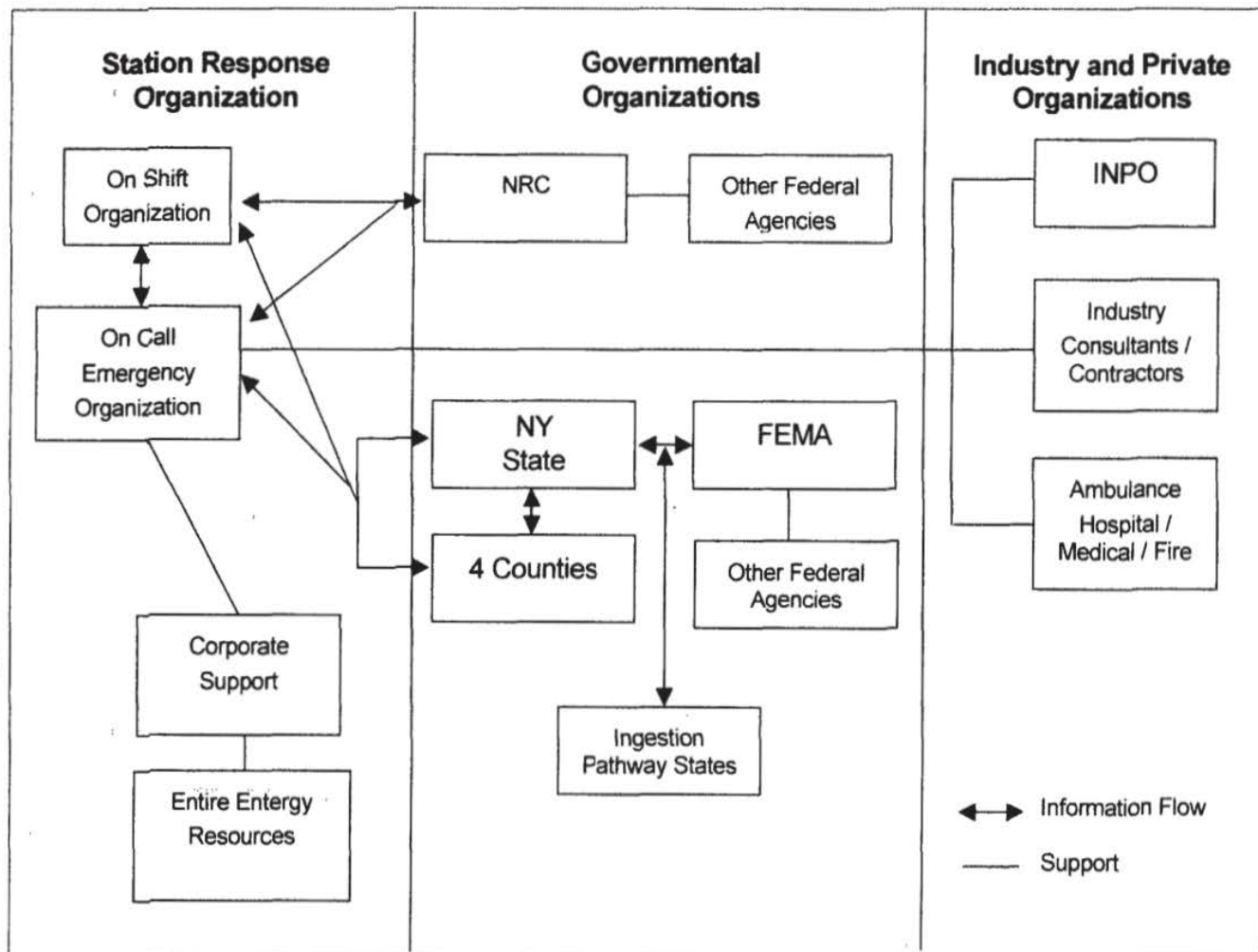
Agreements establishing the concept of operations developed between IPEC and other support organizations having an emergency response role within the Indian Point Emergency Planning Zones (including hospitals and medical transportation) are provided in Appendix 2, "Letters of Agreement." These agreements identify the emergency measures to be provided and the mutually accepted criteria for implementation. Federal, State, and local agencies that have response functions covered by laws, regulations, or executive orders have developed plans to meet these functions. These approved Plans serve as written agreements for agencies response to an incident at Indian Point Energy Center. A contract/purchase order with a private contractor/business is considered acceptable in lieu of a Letter of Agreement for the specified duration of the contract.

4. Continuous Coverage

The Indian Point Emergency Response Organization has sufficient numbers of qualified, trained personnel to provide the capability of continuous (24-hour) operations. The Emergency Planning Department Manager administers programs to ensure availability of resources in the event of an emergency. The Emergency Director has the authority and is responsible for assuring continuity of resources (technical, administrative, and material) in the event of the activation of the Indian Point Emergency Response Organization.

Indian Point Energy Center Emergency Plan

Figure A-1
Emergency Response Organizations Interrelationships



Notes:

1. Until the On-Call Emergency Response Organization is in place the Shift Manager (or Control Room Supervisor if Shift Manager is unavailable) has the responsibility and duty to notify Federal, State and Local governmental authorities and request any assistance needed to protect the public and station personnel.
2. Once the On Call ERO is in place, the Emergency Director, located in the EOF, has overall responsibility and authority to direct the Entergy emergency response and request outside assistance as needed.

Part 2: PLANNING STANDARDS AND CRITERIA

Section B: Station Emergency Response Organization

This section describes the Indian Point Emergency Response Organizations, their key positions and associated responsibilities. It outlines the staffing requirements, which provide initial emergency response actions and provisions for timely augmentation of on-shift personnel when required. It also describes interfaces among Indian Point Energy Center response personnel and specifies offsite support available to respond to the site.

Table B-1, outlines the minimum staffing for emergency response required to be on-shift and other key responders capable of responding within 60 minutes of a declared emergency to support the on-shift organization.

1. Indian Point Emergency Response Organization Assignments:

Figure B-1.1 illustrates the staffing for the normal on-shift complement. Members of the on-shift organization are trained on their responsibilities and duties in the event of an emergency, and are capable of performing initial emergency response actions. Figures B-1.2a-d illustrate the full Emergency Response Organization (ERO). The full ERO will be activated at an Alert, Site Area Emergency or General Emergency.

a. Normal Plant Organization

The normal Indian Point Energy Center staff and operational organization is detailed in Site Administrative Procedures. Figure B-1.3 shows an overview of the normal station organization at Indian Point Energy Center.

Each Unit's normal watch organization [Figure B-1.1] functions twenty-four [24] hours per day, seven [7] days per week. The minimum on-shift staffing is shown in Table B-1 and includes the following qualified individuals:

One [1] Shift Manager, who holds a Senior Reactor Operator's license and is in charge of operating personnel during his/her shift and is responsible for assuring that all operations are conducted in accordance with approved procedures and the limitations set forth in Unit Technical Specifications;

One [1] Control Room Supervisor, who holds a Senior Reactor Operator's license and is responsible for safe operation of the unit within the requirements of the Technical Specifications.

Indian Point Energy Center Emergency Plan

Two [2] Control Room Operators, who hold a Reactor Operator's license, are responsible for manipulating controls in the Control Room including taking the immediate operator action required as stipulated by written procedures necessary to maintain or bring the plant to a safe condition during abnormal and/or emergency conditions;

One [1] Field Support Supervisor or Shift Technical Advisor performs in an advisory capacity to the Shift Manager. This position is not required during cold shutdown;

One [1] Unit 3 SRO is assigned as FBL for both units

Six [6] Nuclear Plant Operators at Unit 2 and five [5] at Unit 3 who perform plant operations, minor maintenance and monitoring under the direction of the Control Room Supervisor. One [1] Unit 2 NPO is assigned to Unit 1 and SSD and one Unit 3 NPO is the Communicator for notifications for both units.

One [1] Radiation Protection Technician and one [1] Chemistry Technician perform radiation monitoring, surveillance, decontamination, and water chemistry as necessary at each unit. The Radiation Protection Technician can perform emergency duties at Unit 2 and/or Unit 3 during emergencies.

The watch organization is augmented during normal working hours Monday through Friday by the Indian Point Energy Center Management and Operations Staff (shown in Figure B.1-3) which is organized to lend expertise to the watch force.

The Security organization maintains site security and guards' access to the plant and controlled areas at all times working under the direction of the Shift Manager and the Security Shift Supervisor.

The Shift Manager (Control Room Supervisor in the absence of the Shift Manager) has the responsibility and authority to declare an emergency, initiate the appropriate immediate action in accordance with written procedures, mitigate the consequences of the emergency, activate the full Emergency Response Organization and notify offsite support and government agencies.

b. On call Emergency Response Organization

The Emergency Response Organization (ERO) is established to assure that a sufficient number of appropriately qualified personnel are available each day, 24 hours a day to deal with any emergency situation.

During an event or emergency at Indian Point Energy Center, the initial phase of the response is conducted by the normal shift complement onsite. The Watch Force, depicted in Figure B-1.1, satisfies the NUREG-0654 requirements for on-shift personnel and on-shift staffing in accord with guidance of NRC's NSIR/DPR-ISG-01 interim staff guidance and NEI 10-05 Assessment of On-Shift Emergency Response Organization Staffing and Capabilities. An analysis of the IPEC On-Shift staffing was conducted and a final analysis report was issued, dated December 17, 2012. The analysis report is available as a separate document. The analysis resulted in a total of thirteen persons on-shift at each unit.

Indian Point Energy Center Emergency Plan

Table B-1 presents, in tabular form, the minimum staffing requirements of on-shift personnel and the additional personnel capable of augmenting the on-shift organization within 60 minutes.

Those personnel identified to augment the Watch Force within 60 minutes of the declaration of an Alert or higher are part of the on-call ERO. These personnel are immediately available during normal working hours or are contacted by an electronic notification system during non-working hours. The electronic notification system is backed up with an automated telephone notification system.

The activation phase consists of Emergency Response Organization (ERO) activation. This includes the normal watch and personnel needed to staff the Emergency Operations Facility (EOF), the Technical Support Center (TSC), the Operations Support Center (OSC) and the Joint Information Center (JIC). This occurs at an Alert classification or higher. A partial or complete ERO activation may be implemented at a NUE classification.

The ERO is capable of performing those activities necessary to:

- (1) Maintain control of the plant and mitigate the consequences of the emergency,
- (2) Conduct accident assessment and analysis to determine the full scope and impact of the situation,
- (3) Establish and maintain communications with authorities responsible for implementing offsite emergency measures,
- (4) Conduct a coordinated emergency public information program, and
- (5) Conduct long-term emergency response activities.

Activation of the ERO gives the Emergency Director full access to the resources of Entergy. In addition to the above listed facilities, corporate resources are made available as needed to support the onsite ERO.

Figures B-1.2a-d illustrates the Indian Point ERO. Personnel who will fill the positions identified are listed in an Emergency Telephone Directory.

2. Authority Over Indian Point Emergency Response Organization:

The Shift Manager (or the Control Room Supervisor in the event that the Shift Manager is unavailable), acting as the Emergency Director, has the authority to declare an emergency, immediately takes charge of the emergency response effort and is responsible for offsite dose assessment until relieved by another qualified Emergency Director. He/she activates the Emergency Response Organization (ERO) as necessary and continues to direct the emergency response until relieved by another qualified Emergency Director.

Indian Point Energy Center Emergency Plan

The relieving Emergency Director/Plant Operations Manager (POM) takes charge of the overall emergency response, thus freeing the Shift Manager to direct his/her attention towards the mitigation of the accident using the emergency operating procedures. The Plant Operations Manager holds this position until the on-call Emergency Director arrives. Overall control of the Onsite Emergency Response Organization is maintained by the Emergency Plant Manager in the TSC. After command and control is transferred to the Emergency Director in the EOF/AEOF, it remains there until the event is terminated.

Although the ERO described in this section of the Plan fulfills the regulatory requirements for emergency response, it may be altered by the Emergency Director. This alteration would be based on the needs within the ERO during an actual event.

3. Succession to Emergency Director:

The duties and responsibilities of the Emergency Director (ED) are initially assumed by the Shift Manager (CR Supervisor in his/her absence). When the EOF becomes operational, the on-call ED relieves the Shift Manager of ED responsibilities, and overall command and control of the emergency is transferred to the EOF. The Plant Operations Manager (POM) relieves the on-shift ED until such time as the EOF is operational. The POM must remain in the Control Room.

The position of on-call Emergency Director is normally staffed by high level station management personnel.

4. Emergency Director Responsibilities:

The Emergency Director is responsible for directing and coordinating the integrated emergency response effort of all Company activities during the emergency including those which originate from Corporate Headquarters. Personnel trained in accordance with this plan and qualified as Emergency Directors are designated in an Emergency Telephone Directory. The Emergency Director is stationed in the Emergency Operations Facility during an Alert, Site Area Emergency or General Emergency and is the interface between the onsite and offsite authorities. He/she has the responsibility and authority to provide Protective Action Recommendations (PARs) to the authorities responsible for implementing offsite emergency measures.

Specific responsibilities of the Emergency Director include:

- Declares and upgrades the emergency as warranted and initiates recovery phase when appropriate (non-delegable);
- Reviews and approves notifications to the State and Local authorities (non-delegable);
- Recommend protective actions for the general public to offsite authorities (non-delegable);
- Authorization of Emergency Exposures and issuance of KI to Entergy personnel outside the Protected Area;
- Establish communications with the emergency response facilities and obtain information on the diagnosis and prognosis of the accident condition;

Indian Point Energy Center Emergency Plan

- Review all radiological, meteorological and operational data and update the offsite authorities and the Joint Information Center (JIC);
- Receive designated responding representatives from offsite emergency agencies and assist in their information and communication needs;
- Arrange for and dispatch any special assistance or service requested (e.g., radiological measurement or protection equipment, onsite medical treatment);
- Coordinate offsite radiological evaluations with the State and Counties;
- Relate all of these actions to the remainder of the emergency response organizations;
- Release of non-essential personnel from the site; and
- Approves information to the public prior to the JIC activation.

The Emergency Director is assisted in these activities by the entire ERO. Although the Emergency Director may delegate some of these responsibilities, he/she may not delegate the responsibility to classify events or for the decision to notify authorities and recommend offsite protective actions.

5. Key Position Responsibilities and Emergency Functions

In addition to the key positions and functions listed below, Table B-5, Emergency Response Organization Functions, gives an overview of the ERO position functions.

a. Emergency Plant Manager (EPM)

The EPM reports directly to the Emergency Director. He/she directs and coordinates the operational aspects of the In-Plant Emergency Organization. He/she assures proper coordination and direction of the efforts of each element of the In-Plant Emergency Organization in returning the plant to and maintaining it in a safe and stable condition. The EPM is located in the Technical Support Center. Specific responsibilities include:

- Directing actions to mitigate the accident;
- Directing the in-plant radiological monitoring;
- Authorization of emergency exposure limits and issuance of KI to Entergy personnel inside the Protected Area;
- Authorizing the mobilization of search and rescue teams;
- Directing and maintaining accountability within the protected area fence; and
- Assuring that all emergency personnel within the protected area fence take adequate protective measures.

b. Emergency Operations Facility (EOF) Manager

The EOF Manager reports directly to the Emergency Director. Specific Responsibilities of the EOF Manager include:

- Coordination of Entergy's emergency response efforts outside the Protected Area Fence,

Indian Point Energy Center Emergency Plan

- Assist the Emergency Director in the interpretation of offsite radiological assessments for emergency classifications and Protective Action Recommendations in terms of both real-time measurements and projected radiological exposures;
- Ensure proper communications between the Indian Point ERO and offsite response organizations, and
- Assist offsite authorities responding to Entergy facilities.

c. Company Spokesperson

The Company Spokesperson reports directly to the JIC Manager. Specific Responsibilities of the Company Spokesperson include:

- With assistance from the JIC Manager, coordination of Entergy's public information response efforts,
- Act as the official Entergy representative to the media, and
- Interface with other response agencies' Public Information Officers.

d. Summary of ERO Functions

In addition to the direction and coordination of the emergency response effort just discussed, other major functional areas of responsibility are identified as necessary to deal with emergency situations. Assignments made for these functional areas are discussed below.

1) Technical Support

Technical support is performed in the Technical Support Center under the direction of the Technical Support Center Manager. It is the central facility for the accumulation and re-transmittal of plant parameters;

Specific functions of the Technical Support Center include;

- Analyzing and developing plans and procedures in direct support of Plant Operations personnel;
- Analyzing and resolving core physics, thermodynamic, hydraulic, mechanical, electrical and instrument problems;
- Designing and coordinating short-term modification to plant systems;
- Keeping the Emergency Director apprised of plant conditions; and
- Interfacing with NRC personnel in the Technical Support Center.

Personnel from the plant's engineering departments are assigned to these functions. In addition personnel with operational experience are assigned to perform operational accident assessment activities in support of the watch personnel handling the in-plant accident conditions.

2) Plant Operations and Assessment of Operational Aspects

Indian Point Energy Center Emergency Plan

While overall direction of in-plant operations is the responsibility of the Plant Operations Manager, responsibility for plant systems operations remains with the Control Room Operators and the Nuclear Plant Operators under the direction of the Shift Manager and Control Room Supervisor.

3) Notification/Communication

The Control Room communication links with offsite authorities are available each day 24-hours a day. The initial notification of offsite authorities and emergency response organization personnel is initiated by the Shift Manager and/or Control Room communicator. Communications with offsite authorities are maintained from the Control Room until the Emergency Director takes over the responsibility at the Emergency Operations Facility. A "Communicator" is designated at the Emergency Operations Facility to establish/maintain communication links.

4) Radiological Accident Assessment (In-Plant)

In-plant radiological monitoring and chemical/radiochemical analysis is provided by the Watch Radiation Protection Technician and Chemistry Technician, respectively, under the direction of the Shift Manager and by other responding personnel under the direction of the EPM.

5) Radiological Accident Assessment (Out-of-Plant and Offsite)

The expertise for evaluating the radiological consequence of the accident is provided by the Dose Assessors and the Offsite Team Coordinator who function directly under authority of the Radiological Assessment Coordinator. These individuals ensure that sufficient monitoring activities are instituted, evaluate and assess the results, and apprise the Radiological Assessment Coordinator of all activities, results and recommendations. Offsite radiological monitoring is provided by responding Radiation Protection Personnel and individuals trained as Offsite Monitoring Team members. These same personnel also provide radiological monitoring outside the Protected Area.

6) Repair and Corrective Actions

The Shift Manager and Nuclear Plant Operators perform emergency repairs if necessary, within the first 60 minutes.

Maintenance mechanics, I&C Technicians and operations personnel (NPOs) who respond to the Operations Support Center perform repair and corrective actions directed by the Operations Support Center Manager.

7) Protective Actions (In-Plant)

The Watch Radiation Protection Technician is normally responsible for radiation protection in-plant. They are immediately available under the direction of the Shift Manager during the first 60 minutes. When the TSC and OSC become operational, Radiation Protection personnel are directed by personnel staffing those facilities.

Indian Point Energy Center Emergency Plan

8) Firefighting

Firefighting is the responsibility of the Fire Brigade as defined in the Indian Point Station Fire Protection Program Plan. The Fire Brigade consists of members who are trained in firefighting techniques and are on duty 24 hours a day. A local fire department may be called if necessary.

9) Rescue Operations and First Aid

Search and rescue jurisdiction during an emergency is divided between the in-plant area (inside the protected area fence), which is handled by the Shift Manager/POM or EPM and the rest of the onsite area which is handled by the Emergency Director. The Shift Manager using available personnel onsite until the other emergency response facilities are activated, if required, would initially direct search and rescue operations.

There is at least one individual on duty 24 hours a day who is trained in first-aid techniques. Additional medical support can be called as necessary.

10) Security Site Access Control and Personnel Accountability

Overall Security response is coordinated in the Incident Command Post (ICP). IPEC Security Management may be assisted by the NY State Police.

Plant security and site access control are the responsibility of the Security Shift Supervisor and the Security Force, with backup assistance available from the Local Law Enforcement Agency (LLEA) as the situation demands.

Personnel accountability during an Alert, Site Area Emergency or a General Emergency is the responsibility of the TSC Security Coordinator. Emergency Plan Implementing Procedures outline the steps that are used to account for all personnel including employees having emergency assignments, visitors and contractors who may be within the Protected Area.

11) Information Dissemination

To assure that only factual and consistent information is released, statements concerning the emergency are the responsibility of Indian Point Energy Center communications personnel and/or individuals assigned to the Joint Information Center. A Press Release Writer is available on call 24 hours a day and is responsible for interfacing with the news media for release of any public statements prior to the Joint Information Center being operational.

Indian Point Energy Center Emergency Plan

The Joint Information Center, (JIC) Manager is responsible for providing accurate and timely information to the public through the news media and coordinating with Federal, State and local public information officials to assure timely exchange and release of information. Both the Press Release Writer and the Joint Information Center Manager have access to all necessary information, either directly available to them or available through the onsite emergency organization. A Public Information Liaison at the Emergency Operation Facility reports to the plant with the initial augmentation of the watch force to facilitate information flow between the plant personnel and the JIC Technical Advisor. The Emergency Director prior to the activation of the Joint Information Center approves information that is used to notify the public. Once the Joint Information Center is operational, the JIC Press Release Writer prepares the press release, and once approved by the ED, disseminates the information to the public.

6. Indian Point Emergency Response Organization Block Diagram:

Figures B-1.1, B-1.2a thru B-1.2d illustrate the positions of the Indian Point Emergency Response Organization and supporting positions. Positions are assigned to interface with Federal, State, and local authorities. Sections B.4 & B.5 discuss specific responsibilities and the interrelationships for key positions. Table B-5 gives a brief description of the functions performed by most ERO positions. Implementing procedures provide details on ERO activities and may identify additional assignments. Also, ERO Managers are responsible for ensuring adequate personnel are available to carry out emergency functions.

7. Entergy Corporate Emergency Response:

Company personnel augment, as necessary the onsite staff in the performance of certain functions required to cope with an emergency. The Admin & Logistics Coordinator and/or the Corporate Duty Manager coordinates corporate support into the Emergency Response Organization once the on call ERO is activated. With the full activation of Emergency Response Organization, Entergy is capable of continuous (24 hour) operations for a protracted period. The Emergency Director will ensure the continuity of resources (technical, administrative and logistics) to support the emergency response.

8. Private Industry Support:

a. Laboratory Services

The availability of laboratory/analytical services used by Entergy Nuclear has been ensured.

Indian Point Energy Center Emergency Plan

b. Additional Technical Assistance

If the need for additional technical assistance is identified, this may be obtained by the Technical Support Center Manager and the Emergency Director. Assistance of this type could include that from the NSSS Supplier (Westinghouse), architect engineer and consultants. A copy of the letter of agreement with Westinghouse is contained in Appendix 2. Other assistance is also available using existing contracts, i.e.: Radiation Protection support.

Institute of Nuclear Power Operations (INPO): Experience has shown that a utility may need resources beyond in-house capabilities for the recovery from a nuclear plant emergency. One of the roles of the Institute of Nuclear Power Operations (INPO) is to assist affected utilities by quickly applying the resources of the nuclear industry to meet the needs of an emergency. INPO has an emergency response plan that enables it to provide assistance to the affected utility in locating sources of emergency personnel, equipment and operational analysis.

American Nuclear Insurers (ANI): In the event of an extraordinary nuclear occurrence (as defined in the Price-Anderson Law) ANI have plans prepared to provide prompt emergency funding to affected members of the public. ANI emergency assistance arrangements contemplate the mobilization and dispatch of emergency claims teams to directly dispense emergency assistance funds to affected members of the public.

9. Offsite Emergency Assistance:

The availability of local support services to assist the emergency forces has been ascertained and agreement letters from each organization in this section have been solicited. These letters are contained in Appendix 2. All support, including support during hostile action events, is provided utilizing the National Incident Management System (NIMS) tool called the Incident Command System (ICS).

a. Ambulance Service

Twenty-four (24) hour ambulance service is provided by the Verplanck Fire District Ambulance with mutual aid backup from other ambulance services. Mutual aid backup from other ambulance services provides for additional emergency medical services, ambulances and EMS personnel. Onsite procedures contain instructions that cover the call for assistance and the handling of the ambulance service personnel. Radio communication exists between the ambulance and local hospitals.

b. Medical

Onsite procedures contain instructions, which cover the request for medical assistance and the handling of patients. In the event that a patient should receive a massive radiation exposure, an expert medical consultant on the management of radiation injuries would be available.

Indian Point Energy Center Emergency Plan

c. Hospitals

The Hudson Valley Hospital Center at Peekskill / Cortlandt has agreed to accept patients from the Indian Point Energy Center site who have been injured, contaminated or irradiated. The hospital provides facilities such as an emergency room, a laboratory, a radiology department and a nuclear medicine department.

The Phelps Memorial Hospital Center, Sleepy Hollow, New York has agreed to serve as the backup hospital.

d. Law Enforcement

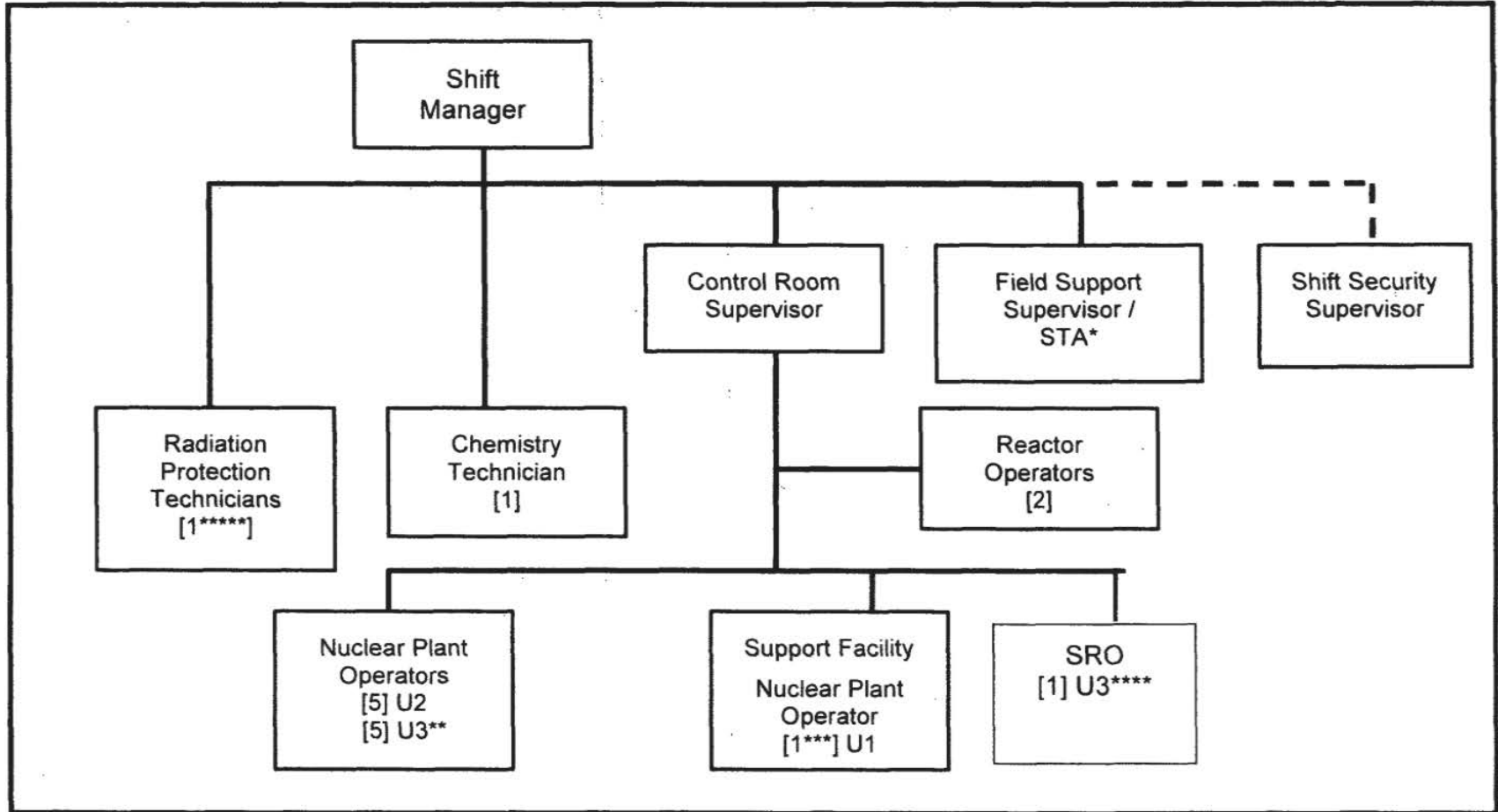
When notified that assistance is required, IPEC Security will notify the New York State Police which is the lead Local Law Enforcement Agency (LLEA). As the situation demands, the Westchester County Police serve as the back-up to the State Police to provide timely reinforcement. The handling of security matters including those involving hostile action for the Indian Point Energy Center site is covered in the Security Safeguards Contingency Plan and Incident Response Plan.

e. Fire

Offsite firefighting support is provided by the Verplanck, Buchanan, and/or Montrose Fire Departments, as resources permit, with mutual aid backup from other fire departments. Mutual aid for fire response, fire apparatus, and firefighter resources is described in the Westchester County Fire Mutual Aid Plan.

Indian Point Energy Center Emergency Plan

Figure B-1.1 Indian Point Energy Center Station Watch Organization per Unit



*Consistent with NUREG-0737 and Technical Specifications, the Field Support Supervisor / Shift Technical Advisor is not required on shift during cold shutdown conditions.

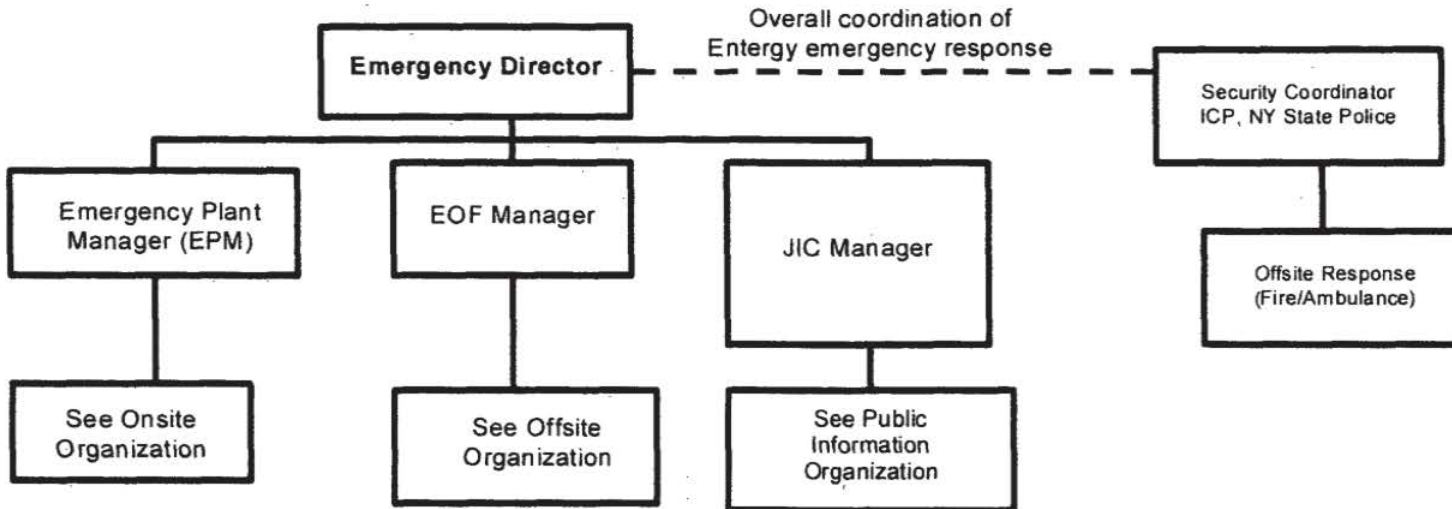
** One U3 NPO would be the communicator/notifications for both units

*** Unit 2 has additional NPO who maintains watch on Unit 1 systems

**** The U3 SRO would serve as FBL for both units

***** This RP Technician would assist at affected unit if needed

Figure B-1.2a Emergency Response Organization – Major Areas



- Overall coordination of onsite response
- Safety of onsite personnel
- Advise ED on plant status, radiological conditions and plant related EALs
- Security Interface

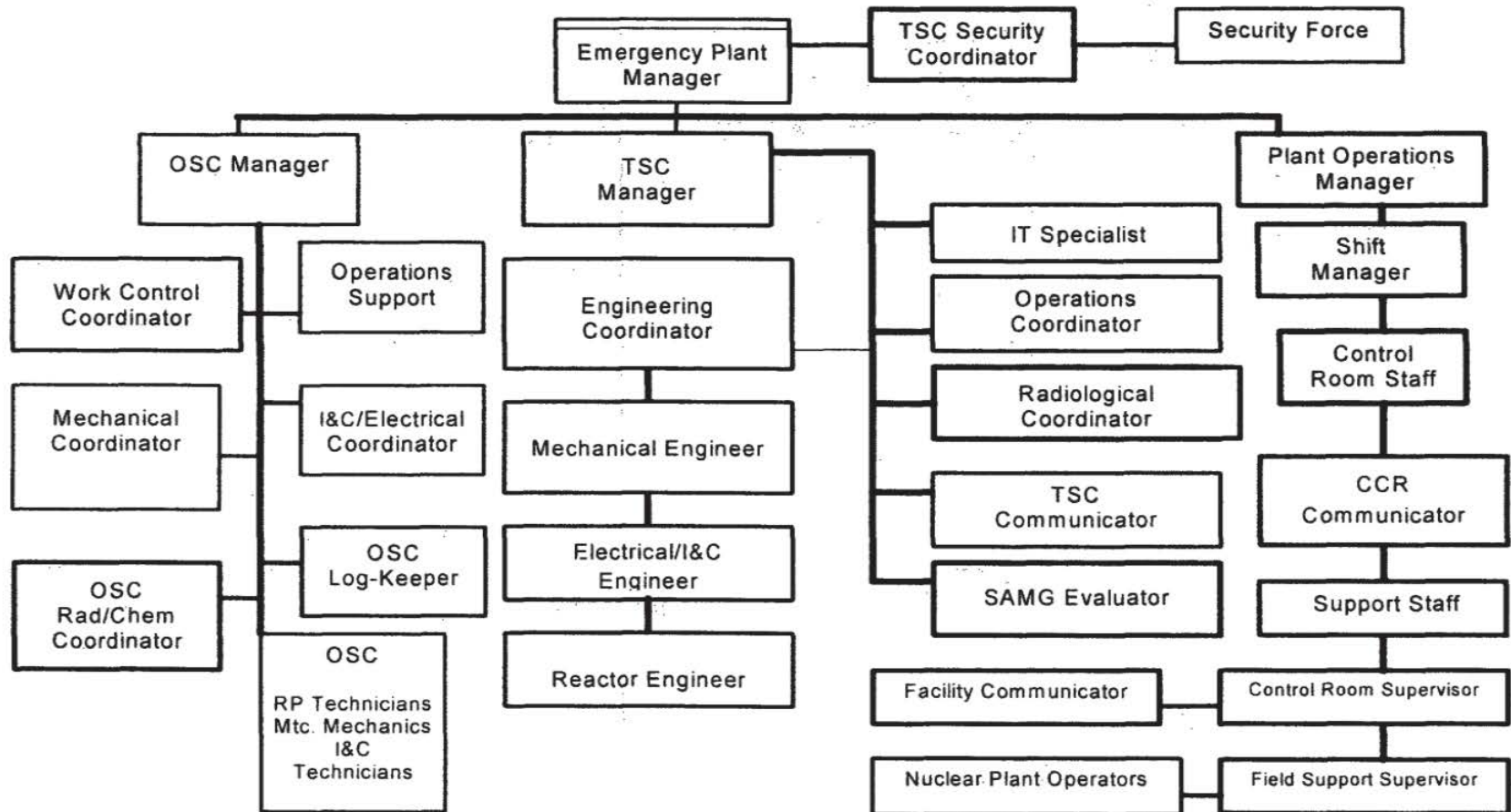
- Coordination of Entergy offsite response
- Safety of offsite Entergy personnel
- Advise ED on offsite radiological conditions and related EALs
- Assist ED in interfacing with offsite authorities

- Overall coordination of Entergy Public Information response
- Act as representative to the media
- Keep ED informed of any Public Information concerns

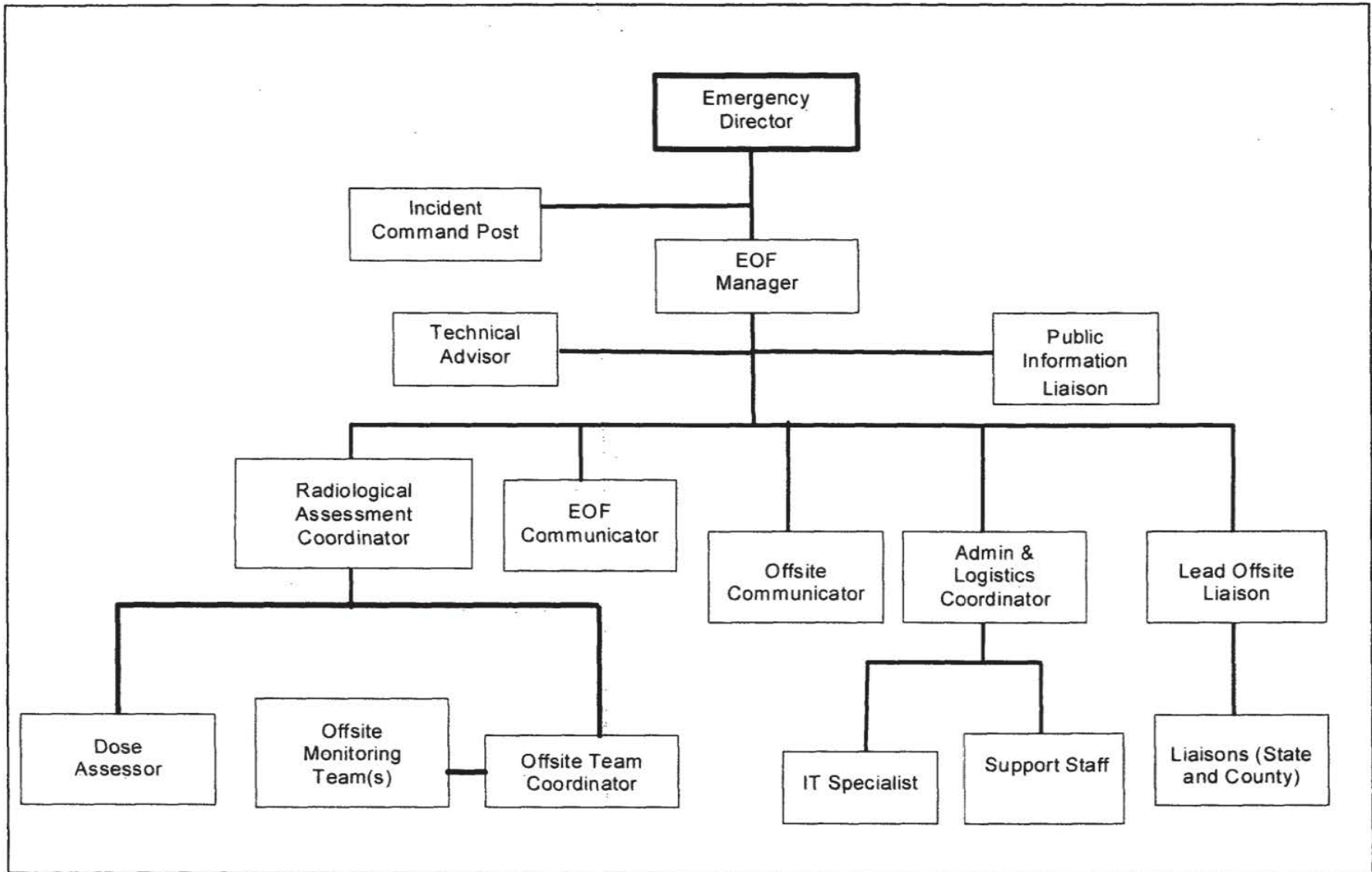
- Overall coordination of Security response
- Coordinate Offsite responders such as Fire & Ambulance

Indian Point Energy Center Emergency Plan
 Figure B-1.2c Emergency Response Organization Offsite

Figure B-1.2b Emergency Response Organization – Onsite

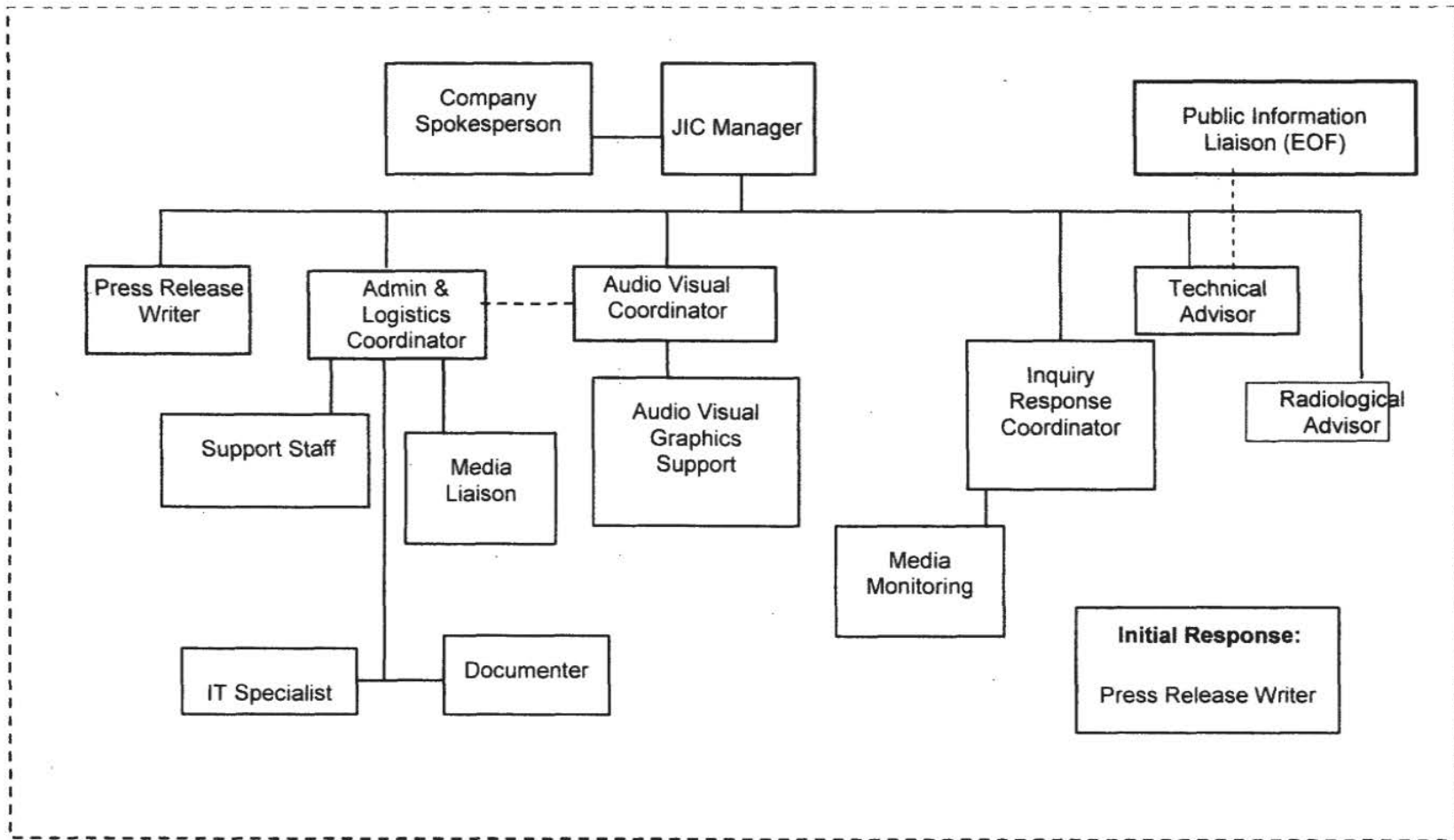


**Indian Point Energy Center Emergency Plan
Figure B-1.2c Emergency Response Organization Offsite**

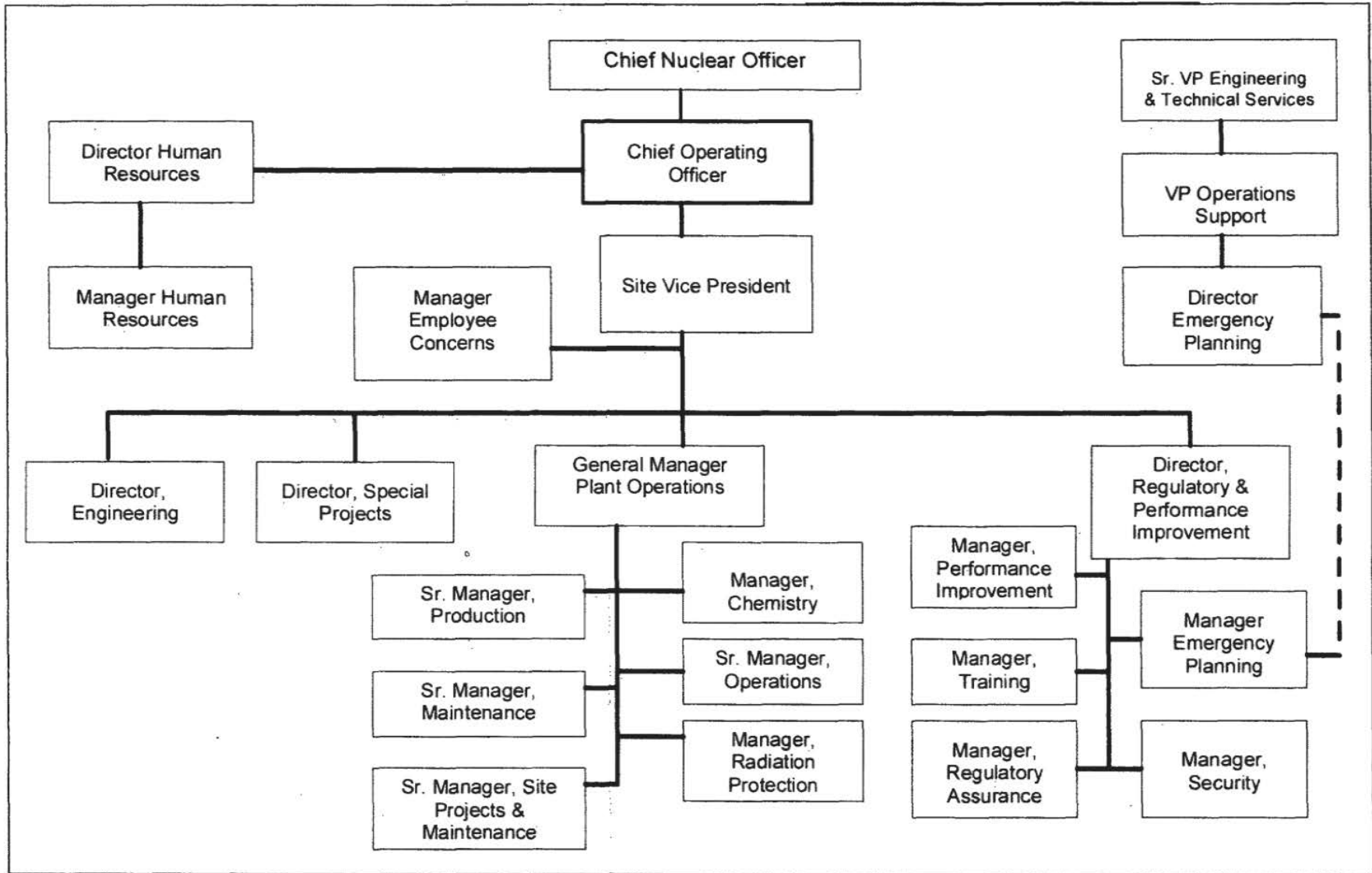


Indian Point Energy Center Emergency Plan

Figure B-1.2d Emergency Response Organization – Public Information



Normal Figure B-1.3 Station Organization



Indian Point Emergency Plan

TABLE B – 1 Comparison of NUREG – 0654 to Indian Point Emergency Center

NUREG – 0654					Indian Point Energy Center ERO Staffing					Notes
Position No.	Position Title or Expertise / Major Task	On Shift	30 Min.	60 Min.	ERO Position, or Expertise or Job Title	On Shift			60 Min.	[1] [2]
						U 2	U 3	U 1		
Plant Operations and Assessment										
1	Shift Supervisor (SRO)	1	--	--	Shift Manager	1	1	0	--	
2	Shift Foreman (SRO)	1	--	--	Control Room Supervisor	1	1	0	--	
3	Control Room Operators	2	--	--	Reactor Operators or Field Support Supervisor	2	2	0	--	[3]
4	Auxiliary Operators	2	--	--	Nuclear Plant Operators	5	4	1	--	[12] [13]
Emergency Direction and Control (Emergency Coordinator)					Emergency Director					
5	Shift Technical Advisor, Shift Supervisor or designated facility manager	1	--	--	Shift Manager or Control Room Supervisor	1	1	0	--	[4] [10]
Notification / Communication					Communicator					
6	Communicator – notify licensee, State, Local and Federal personnel and maintain communication	1	1	2	Nuclear Plant Operator from U3 provides notifications for both units ----- Offsite Communicator plus ----- Any two of the following: Offsite Team Coordinator Control Room Communicator TSC Communicator	0	1		-- 1 2	[5]
Radiological Accident Assessment and Support of Operational Accident Assessment										
7	Senior Manager – EOF Director			1	Emergency Director or EOF Manager	--			1	
8	Senior Health Physics (HP) Expertise – Offsite Dose Assessment	--	1	--	Radiological Assessment Coordinator	--			1	

Indian Point Emergency Plan
TABLE B – 1 Comparison of NUREG – 0654 to Indian Point Emergency Center

NUREG – 0654					Indian Point Energy Center				Notes	
Position No.	Position Title or Expertise / Major Task	On Shift	30 Min.	60 Min.	ERO Staffing					
					ERO Position, or Expertise or Job Title	On Shift	60 Min			
9	Offsite Surveys	--	2	2	Two Teams of Field Monitors	--		4	[6]	
10	Onsite (out-of-plant) Surveys	--	1	1	RP Technicians	--		2		
11	RP Technicians	1	1	1	RP Technicians	1	1	0	2	[11]
12	Rad / Chem Technicians	1	--	1	Chemistry Technicians	1	1	0	1	
Plant System Engineering, Repair and Corrective Action										
13	Shift Technical Advisor	1	--	--	Field Support Supervisor or Shift Technical Advisor	1	1	0	--	
14	Core / Thermal Hydraulics	--	1	--	Reactor Engineer	--			1	
15	Electrical	--	--	1	Electrical Engineer	--			1	
16	Mechanical	--	--	1	Mechanical Engineer	--			1	
17	Mechanical Maintenance / Radwaste Operator	1	--	1	Mechanical Maintenance	1	0		2	[7] [10]
18	Electrical Maintenance	1	1	1	Electrical Maintenance	0	1		2	[8] [10]
19	Instrument & Control Technician	--	1	--	Instrument & Control Technician	--			1	
Protective Actions (In-Plant)										
20	RP Technicians	2	2	2	RP Technicians or other qualified personnel	2			4	[9] [10]

Indian Point Emergency Plan
TABLE B – 1 Comparison of NUREG – 0654 to Indian Point Emergency Center

NUREG – 0654					Indian Point Energy Center ERO Staffing					Notes
Position No.	Position Title or Expertise	On Shift	30 Min.	60 Min.	ERO Position, or Expertise or Job Title	On Shift			60 Min.	[1] [2]
Fire Fighting										
21	Fire Brigade	Fire Brigade per TS	Local Support		Fire Brigade	3	2	0	Local Support	[13] [14]
Rescue Operations and First Aid										
22	Rescue – First Aid	2	Local Support		Rescue – First Aid	2			Local Support	[10]
Site Access Control and Personnel Accountability										
23	Security Personnel	Per Security Plan			Security Personnel	Per Security Plan				
Totals		10	11	15		12	13	1	26	

(a) Per NUREG-0654, May be provided by shift personnel assigned other functions

(b) On-shift staffing is in accord with guidance of NRC's NSIR/DPR-ISG-01 Interim Staff Guidance and NEI 10-05 Assessment of On-Shift Emergency Response Organization Staffing and Capabilities.

Indian Point Emergency Plan
TABLE B – 1 Comparison of NUREG – 0654 to Indian Point Emergency Center

Note:

- [1] For Emergency Response Organization purposes resources may be shared between units. The unaffected unit in operation must maintain a Control Room Supervisor, one Reactor Operator and one Nuclear Plant Operator. All other shift positions may be shared. Appropriate cross-training is required.
- [2] NUREG-0654, 30 minute and 60 minute response capabilities are combined into the 60-minute response capability for Indian Point Energy Center, as per originally approved Emergency Plan for both Unit 2 and Unit 3.
- [3] The assessment function may be performed by the Field Support Supervisor
- [4] The Emergency Coordinator (Emergency Director) position is initially filled by the Shift Manager or Control Room Supervisor. He is relieved of this duty by the Plant Operations Manager (POM) or the EOF Emergency Director who are one-hour responders.
- [5] IPEC has a designated Communicator on shift (one Nuclear Plant Operator) and an Offsite Communicator in the EOF as a required one-hour responder. The additional two communicators are filled by the following: TSC Communicator and Offsite Team Coordinator – EOF.
- [6] Offsite survey teams are filled by Offsite Monitoring Teams
- [7] The repair and corrective action function would initially be performed by nuclear plant operators for minor mechanical maintenance activities. Two additional maintenance mechanics who are one hour responders would troubleshoot and correct equipment malfunctions designated in NUREG-0654 for Mechanical Maintenance / Radwaste Operator.
- [8] The repair and corrective action function would initially be performed by nuclear plant operators for minor electrical maintenance activities. Two additional electrical maintenance mechanics who are one-hour responders would troubleshoot and correct equipment malfunctions.
- [9] On shift and other available qualified personnel and the unaffected unit RP Technicians can fulfill the function for basic in-plant radiation protection activities. Four additional RP Technicians or other qualified personnel are required as one-hour responders.
- [10] In accordance with NUREG-0654, this function may be provided by shift personnel assigned other functions.
- [11] Credit for one RP Technician may be taken for the opposite Unit on-shift RP Technician
- [12] One (1) Unit 1 NPO is designated for SSD.
- [13] Three (3) Unit 2 NPO's and one (1) Unit 3 NPO are designated Fire Brigade Members.
- [14] One (1) SRO designated FBL.

Indian Point Energy Center Emergency Plan
Table B-5 - Emergency Response Organization Functions

Position / Assigned Location	Reports To	Major Functions
Control Room (CR)		
Shift Manager	POM	Acts as ED until relieved.
Control Room Supervisor (CRS)	Shift Manger	Immediate supervision of plant operations
Field Support Supervisor/Shift Technical Advisor	Shift Manager	Provide technical support to operations shift
Reactor Operator (RO)[s]	CRS	Control Room operations / communications
Nuclear Plant Operator (NPO)[s] (unit 1 only)	CRS	Operates Unit 1 and support equipment
Nuclear Plant Operator (NPO)[s] (Nuclear, Conventional, Roving)	CRS	Operates equipment outside the control room, minor maintenance
Offsite (CCR) Communicator	CRS	Communications with outside organizations
Support Staff	Shift Manager	Provide plant data to TSC
Watch Chemistry Technician (OSC when activated)	Shift Manager	Provide chemistry support as needed, water chemistry
Watch Radiation Protection (RP) Technician (OSC when activated)	Shift Manager	Provide RP support as needed, rad monitoring, decon and surveillance
Facility Communicator	Shift Manager	Provides data to the other emergency response facilities
Plant Operations Manager (POM)	EPM	Relieves the SM as ED and acts as ED until relieved by the ED in the EOF. Manager emergency response operations activities in the Control Room and keep the EPM informed of plant status and response activities. Advises ED on classification issues and other operational concerns.
Command Guard House (CGH)		
Security Shift Supervisor (SSS)	SM / POM	Supervises Security Force and acts as Lead Accountability Officer
Security Guard[s]	SSS	Provide physical control of plant areas, assist in accountability and search and rescue.

Indian Point Energy Center Emergency Plan
Table B-5 - Emergency Response Organization Functions

Position / Assigned Location	Reports To	Major Functions
Emergency Operations Facility (EOF)		
Emergency Director (ED)		Overall Direction of Entergy Emergency Response
EOF Manager	ED	Manages Entergy Offsite response activities
Technical Advisor	EOF Manager	Provide technical advice to ED and track EALs
Radiological Assessment Coordinator	EOF Manager	Directs offsite radiological assessment and control efforts
Dose Assessor	RAC	Leads dose assessment activities
Offsite Team Coordinator	RAC	Coordinates Field Monitoring Team Activities
Offsite Monitoring Teams	Offsite Team Coordinator	Perform Environmental Monitoring and Sampling outside the Protected Area
Admin and Logistics Coordinator	EOF Manager	Coordinate Entergy corporate support to the onsite Emergency Response Organization and provide logistics support to ERO
Support Staff	EOF Manager / Admin & Logistics Coordinator	Provide support to EOF Staff
IT Specialist	EOF Manager / Admin & Logistics Coordinator	Assist EOF Staff in operation of EOF Equipment
Offsite Communicator	EOF Manager	Communicate with offsite emergency organizations
Public Information Liaison	EOF Manager	Provide information to JIC
Lead Offsite Liaison	EOF Manager	Liaison to Offsite Representatives arriving at the EOF and coordinates information flow to State and County Liaisons located at offsite EOCs
County & State Liaisons (may be located at offsite EOCs)	Lead Offsite Liaison	Assist offsite authorities in coordinating emergency response.
Incident Command Post	ED	Coordinate overall security response; interface with local law enforcement.
EOF Communicator	EOF Manager	Communicates with other ERFs

Indian Point Energy Center Emergency Plan
 Table B-5 - Emergency Response Organization Functions

Position / Assigned Location	Reports To	Major Function
Operations Support Center (OSC)		
Operations Support Center (OSC) Manager	EPM	Manages repair and assessment activities of team sent into the plant.
Work Control Coordinator	OSC Manager	Assemble, brief, dispatch, track and debrief OSC teams sent out from the OSC
OSC Rad/Chem Coordinator	OSC Manger	Coordinate radiological controls inside the Protected Area and assist in coordination of chemistry sampling
Mechanical Coordinator	OSC Manager	Coordinate Maintenance activities
I&C/Electrical Coordinator	OSC Manager	Coordinate I&C activities
Operations Support	OSC Manager	Coordinate Operations support to the CCR
Radiation Protection Technicians	Rad/Chem Coordinator	Perform radiological surveys, sampling and analysis as needed, provide RP coverage for OSC operations
Chemistry Technician	Rad/Chem Coordinator	Perform chemistry sampling and analysis as needed, assist in OSC operations
Maintenance Mechanic(s)	Maintenance Coordinator	Perform mechanical repairs and assessment activities as needed
Instrument & Control (I&C) Technician(s)	I&C Coordinator	Perform I&C repairs and assessment activities as needed
OSC Operators	Operations Support	Operate plant systems as directed by Operations Support in an SAE or GE. Assist OSC teams in repair and assessment activities.
OSC Log-Keeper	OSC Manager	Coordinate Accountability with Security Coordinator and as necessary verify/set up equipment. Provide support as needed.

Indian Point Energy Center Emergency Plan
 Table B-5 - Emergency Response Organization Functions

Position / Assigned Location	Reports To	Major Functions
Technical Support Center (TSC)		
Emergency Plant Manager (EPM)	ED	Manage emergency response activities inside the Protected Area and keep the ED informed of plant status and response activities.
Technical Support Center (TSC) Manager	EPM	Manage technical assessment activities.
Engineering Coordinator	TSC MGR	Coordinate TSC Engineering Assessment Activities
Reactor Engineer	Engineering Coordinator	Perform Core Physics Assessments
Mechanical Engineer	Engineering Coordinator	Perform Mechanical Engineering Assessments
Electrical / I&C Engineer	Engineering Coordinator	Perform Electrical / I&C Engineering Assessments
Operations Coordinator	TSC MGR	Perform Operations Engineering Assessments
TSC Radiological Coordinator	TSC MGR	Radiological Oversight
IT Specialist	TSC MGR	ERDS Activation/Verification and maintain IT equipment (computers, phones) operational.
TSC Security Coordinator	TSC MGR	Direct Physical Security
TSC Communicator	TSC MGR	Perform TSC communications as needed
SAMG Evaluator	TSC MGR	Assist EPM in implementation of Severe Accident Management Guidelines

Indian Point Energy Center Emergency Plan
Table B-5 - Emergency Response Organization Functions

Position / Assigned Location	Reports To	Major Functions
Joint Information Center (JIC)		
Company Spokesperson	JIC Manager	Act as official spokesperson for Entergy, coordinate public information with other Public Information Officers
JIC Manager	ED	Manage operations of the Joint Information Center
Technical Advisor	JIC Manager	Provide technical expertise to JIC Staff
Admin & Logistics Coordinator	JIC Manager	Maintains access control to the JIC. Ensures distribution of press releases.
Documenter	JIC Admin & Logistics Coordinator	Maintain facility log on WebEOC. Ensure timeliness of facility briefings.
IT Specialist	JIC Admin & Logistics Coordinator	Assist JIC Staff with computer hardware and software use
Audiovisual Coordinator	JIC Manager	Manages Audio/Video operations
Support Staff	Admin & Logistics Coordinator	Provide support to JIC Personnel
Press Release Writer	JIC Manager	Writes News Releases
Radiological Advisor	JIC Manager	Provides radiological information from the EOF to the JIC staff
Inquiry Response Coordinator	JIC Manager	Interacts with New York State and Counties on information and rumors
Media Monitoring	Inquiry response Coordinator	Monitor media for rumors and items to be addressed in news releases or media briefings
Media Liaison	Admin & Logistics Coordinator	Acts as Entergy's interface for media present at the JIC
Audio Visual Graphics Support	Audio Visual Coordinator	Supports AV equipment and graphics at the JIC

Part 2: PLANNING STANDARDS AND CRITERIA

Section C: Emergency Response Support and Resources

This section describes the provisions for requesting and effectively utilizing support resources and for accommodating State and local staff at the Indian Point Energy Center Emergency Operations Facility (EOF).

1. Federal Response Support and Resources

Assistance is available from Federal agencies through the Federal Radiological Emergency Response Plan (FRERP). The primary Federal agencies that provide assistance to the State and Indian Point Energy Center, respectively, are the Department of Homeland Security (DHS)/Federal Emergency Management Agency (FEMA) and the Nuclear Regulatory Commission (NRC). Other Federal agencies, through FRERP, provide assistance to the State and Local Authorities in an emergency.

- a. Sections A and B of this Plan identify the specific ERO Positions by title who are authorized to request Federal assistance.
- b. Federal agencies that may provide assistance in direct support of Indian Point Energy Center in the event of an accident are identified in Section A of this plan. If needed, Federal resources are made available to Indian Point Energy Center in an expeditious and timely manner.
- c. Each Indian Point Energy Center emergency response facility has the equipment and communications capability necessary for a continuous high level of response, interaction and communication among key personnel during emergency conditions. The Technical Support Center (TSC) is able to accommodate NRC representatives. A conference/working area has been provided for their use. The EOF/AEOF has space to accommodate NRC representatives as well as representatives from DHS/FEMA, State and key local authorities.

In addition to Indian Point Energy Center facilities and equipment, State and local facilities and equipment are available to support the Federal response.

2. Liaisons

- a. The NRC, DHS/FEMA, State, and Local authorities may dispatch representatives to the EOF/AEOF where accommodations have been provided.
- b. At the Alert level and above, Utility liaisons are dispatched to the State and local government EOCs to act as communications liaisons and to provide clarification of emergency response information.

Indian Point Energy Center Emergency Plan

3. Radiological Laboratories

In addition to Indian Point Energy Center's radiological assessment facilities, contracted services may be utilized to analyze inplant and offsite environmental samples. Outside analytical assistance may be requested from State and Federal agencies and other utilities if the offsite radiological monitoring and environmental sampling operation exceeds the capacity of the Indian Point Energy Center capabilities.

The availability of commercial laboratory/analytical services used by Entergy facilities has been ensured.

4. Other Assistance

Contracted services are available and may be used in support of an emergency response at the Indian Point Energy Center. The availability of services have been ascertained and agreement letters are contained in Appendix 2.

Though not a typical contracted service, the Institute of Nuclear Power Operation (INPO) is able to provide:

- Assistance in locating sources of emergency manpower and equipment;
- Access to an organization of industry experts who could advise the utility on technical matters, and;
- Analysis of operational aspects of the incident.

Additional facilities, organizations and individuals as listed in an emergency phone list, are available and may be used in support of emergency response.

Part 2: PLANNING STANDARDS AND CRITERIA

Section D: Emergency Classification System

This section describes the classification and emergency action level scheme used to determine the minimum response to an abnormal event at the Station. This scheme is based on Indian Point Energy Center Units 2 & 3 systems, effluent parameters and operating procedures. The initial response of Federal, State and local agencies is dependent upon information provided by the Indian Point Emergency Response Organization. Indian Point Energy Center emergency planning personnel work closely with State and local agencies to ensure consistency in classification schemes and procedural interfaces.

Indian Point Energy Center maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an emergency action level has been exceeded and promptly declares the emergency condition as soon as possible following identification of the appropriate emergency classification level.

1. Emergency Classification:

This Plan is based on consideration of conceivable consequences of potential situations ranging from incidents where effects on plant and personnel are negligible to highly unlikely releases of radioactivity, which could affect members of the public. The emergency classification of these conditions, both radiological and non-radiological, indicates the relative severity for immediate implementation of response actions. The four (4) major classifications increase in overall severity from Notification of Unusual Event (least severe), Alert, Site Area Emergency, General Emergency (most severe).

These mutually exclusive classifications cover the postulated spectrum of potential and actual emergencies. Each classification is associated with a particular set of immediate actions. Each classification is characterized by certain initiating symptoms or events called Emergency Action Levels (EALs). These action levels include specific sets of plant parameters (i.e., instrument indications, system status, etc.) or events that are used to determine the appropriate emergency classification. A brief explanation of the four classification levels follows:

Notification of Unusual Event (NUE)

A Notification of Unusual Event classification is used to denote events that are in process or have occurred, which indicate a potential degradation of the level of safety of the plant. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.

This is the least severe of the four (4) classifications. The purpose of this classification is primarily notification. These notifications provide for (1) assurance that the first step in any response later found to be necessary has been carried out, (2) bringing the operating staff to a state of readiness, and (3) providing systematic handling of unusual events information and decision making.

Indian Point Energy Center Emergency Plan

The Shift Manager/Emergency Director will ensure:

- a) Notification of State and local offsite authorities within 15 minutes of classifying the event;
- b) Required Station Management and the NRC are informed of the nature of the unusual condition;
- c) Optional augmentation of on-shift resources as needed, which may include full or partial staffing of the Technical Support Center, Operations Support Center, Emergency Operations Facility and/or the Joint Information Center;
- d) Continued assessment and response as necessary;
- e) Escalation to a more severe class, if appropriate;

OR

- f) Close out with verbal summary to offsite authorities followed by written summary within 24 hours.

State and local offsite authorities would, as directed by their respective Emergency Plans:

- a) Provide fire or security assistance if requested;
- b) Escalate to a more severe class, if appropriate;

OR

- c) Standby until a verbal closeout.

Alert

An Alert classification indicates events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of Hostile Action. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.

The purpose of the Alert is to (1) ensure that emergency personnel are readily available to respond if the situation becomes more serious or to perform confirmatory radiation monitoring if required, and (2) provide the offsite authorities with current information. Where radiological releases to the environment have occurred, it is possible that the site boundary doses will exceed 10 mRem Total Effective Dose Equivalent (TEDE) or 10 mRem/hr external exposure rate.

The Shift Manager/Emergency Director will ensure:

- a) Initiation of activation of the Emergency Response Organization which results in the staffing of the Technical Support Center, Operations Support Center, Emergency Operations Facility and the Joint Information Center;
- b) Notification of State and local offsite authorities within 15 minutes of classifying the event;
- c) Prompt notification of the NRC (not to exceed one hour);

Indian Point Energy Center Emergency Plan

- d) Continued assessment and response as necessary;
- e) Dispatch of field monitoring teams and establish associated communications, as necessary;
- f) Periodic plant status updates are provided to offsite authorities (approximately every 30 minutes or period agreed upon with offsite authorities);
- g) Meteorological assessments are provided to offsite authorities and, if any releases are occurring, dose estimates for actual release;
- h) Escalation to a more severe class, if appropriate;

OR

- i) Close out in emergency class by verbal discussion with offsite authorities followed by written summary within eight (8) hours of entering recovery after an Alert or higher classified event.

State and local offsite authorities would, as directed by their respective Emergency Plans:

- a) Provide fire or security assistance if requested;
- b) Augment resources by activating EOC 's;
- c) Augment resources and bring primary response centers and Emergency Alert System (EAS) to standby status;
- d) Alert key emergency personnel to standby status including monitoring teams and associated communications;
- e) Provide confirmatory offsite radiation monitoring and ingestion pathway dose projections if actual releases substantially exceed technical specification limits;
- f) Maintain Alert status until verbal closeout or escalation.

Site Area Emergency (SAE)

A Site Emergency indicates events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public, or Hostile Action that results in intentional damage or malicious acts: (1) toward site personnel or equipment that could lead to the likely failure of or; (2) that prevent effective access to equipment needed for protection of the public. Any releases are not expected to result in exposure levels that exceed EPA Protective Action Guideline exposure levels except near the site boundary.

The purpose of the Site Area Emergency declaration is to (1) ensure that response centers are manned, (2) ensure that monitoring teams are dispatched, (3) ensure that personnel required for evacuation of near-site areas are at duty stations if the situation becomes more serious, (4) provide current information for and consultation with offsite authorities and public, (5) provide updates for the public through offsite authorities.

Indian Point Energy Center Emergency Plan

Where radiological releases to the environment have occurred, it is possible that the site boundary doses will exceed 100 mRem Total Effective Dose Equivalent (TEDE), 500 mRem CDE Thyroid, 100 mRem/hr external exposure rate, or 500 mRem/hr Thyroid Exposure Rate (for one hour of inhalation).

The Shift Manager/Emergency Director will ensure:

- a) Initiation of activation of the Emergency Response Organization which results in the staffing of the Technical Support Center, Operations Support Center, Emergency Operations Facility and the Joint Information Center;
- b) Notification of State and local offsite authorities within 15 minutes of classifying the event;
- c) Prompt notification of the NRC (not to exceed one hour);
- d) Continued assessment and response as necessary;
- e) Dispatch of field monitoring teams and establish associated communications;
- f) An individual provides for plant status updates to offsite authorities and periodic news media briefings (perhaps joint with offsite authorities);
- g) Senior technical and management staff on-site are made available for consultation with NRC and State on a periodic basis;
- h) Meteorological and dose estimates are provided to offsite authorities for actual releases via a dedicated individual or automated data transmission;
- i) Release and dose projections based on available plant condition information and foreseeable contingencies are provided to appropriate agencies;
- j) Accountability process is initiated;
- k) Escalation to General Emergency class, if appropriate;

OR

- l) Close out by briefing of offsite authorities at Emergency Operations Facility and by phone followed by written summary within eight (8) hours of close.

State and local offsite authorities would as directed by their respective Emergency Plans:

- a) Provide any assistance requested;
- b) If sheltering near the site is desirable, activate public notification system;
- c) Provide public within at least ten miles with periodic updates on emergency status;
- d) Augment resources by activating EOC's and any other primary response centers;
- e) Dispatch key emergency personnel including monitoring teams and establish associated communications;

Indian Point Energy Center Emergency Plan

- f) Alert other emergency personnel to standby status (e.g., those in need for evacuation) and dispatch personnel to near site duty stations;
- g) Provide offsite monitoring results to licensee, DOE and others and jointly assess them;
- h) Continuously assess information from licensee and offsite monitoring teams with regard to changes to protective action already initiated for public and mobilizing evacuation resources;
- i) Recommend placing milk animals within 2 miles on stored feed and assess the need to extend the distance;
- j) Provide media briefings, perhaps with a licensee;
- k) Maintain Site Area Emergency status until closeout or escalation.

General Emergency (GE)

A General Emergency indicates events are in progress or have occurred which involved actual or likely major failure of plant functions needed for protection of the public or Hostile Action that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline for more than the immediate site area.

The purpose of the General Emergency is to (1) initiate predetermined protective actions for the public, (2) provide continuous assessment of information from licensee and offsite organization measurements, (3) initiate additional measures as indicated by actual or potential releases, (4) provide consultation with offsite authorities, and (5) provide updates for the public through offsite authorities. Where radiological releases to the environment have occurred, it is possible that the site boundary doses could exceed 1000 mRem Total Effective Dose Equivalent (TEDE) and 5000 mRem CDE Thyroid, 1000 mRem/hr External Exposure Rate, or 5000 mRem/hr Thyroid Exposure Rate (for one hour of inhalation).

The Shift Manager/Emergency Director will ensure:

- a) Initiation of activation of the Emergency Response Organization which would staff the Technical Support Center, Operations Support Center, Emergency Operations Facility and the Joint Information Center;
- b) Notification of State and local offsite authorities within 15 minutes of classifying the event;
- c) Prompt notification of the NRC (not to exceed one hour);
- d) Continued Assessment and response as necessary;
- e) Dispatch of field monitoring teams and associated communications;
- f) An individual is provided for plant status updates to offsite authorities and periodic news media briefings (perhaps joint with offsite authorities);
- g) Senior technical and management staff on-site are made available for consultation with NRC and State on a periodic basis;

Indian Point Energy Center Emergency Plan

- h) Meteorological and dose estimates are provided to offsite authorities for actual releases;
- i) Release and dose projections based on available plant condition information and foreseeable contingencies are performed and provided to offsite authorities;
- j) Accountability process is initiated;
- k) Close out by briefing of offsite authorities at Emergency Operations Facility and by phone followed by written summary within eight hours of closeout.

State and local offsite authorities would as directed by their respective Emergency Plans:

- a) Provide any assistance requested;
- b) Activate immediate public notification of emergency status and provide public periodic updates;
- c) Recommend, as a minimum, sheltering for 2 mile radius and 5 miles downwind and assess need to extend distances; consider advisability of evacuation (projected time available vs. Evacuation Time Estimates);
- d) Augment resources by activating EOC's and any other primary response centers;
- e) Dispatch key emergency personnel including monitoring teams and establish associated communications;
- f) Dispatch other emergency personnel to duty stations within 5 mile radius and alert all others to standby status;
- g) Provide offsite monitoring results to licensee, DOE and others and jointly assess them;
- h) Continuously assess information from licensee and offsite monitoring teams with regard to changes to protective actions;
- i) Recommend placing milk animals within 10 miles on stored feed and assess need to extend distance;
- j) Provide news media briefings, perhaps with a licensee;
- k) Maintain General Emergency status until closeout.

Classification Downgrading

The Indian Point Energy Center policy on Classification downgrading is as follows:

All events once declared shall remain in effect until: 1. Such time as conditions warrant termination of the event and entry into the Recovery Phase or 2. the event is re-classified at a higher level.

2. **Emergency Action Levels:**

The postulated accidents analyzed in each units' Final Safety Analysis Report (FSAR), the example initiating conditions found in NEI 99-01 REV 5 "Methodology for Development of Emergency Action Levels" were evaluated to establish an emergency classification and emergency action level scheme. NEI 99-01 REV 5 has been accepted by the NRC as an alternative to NUREG-0654-REV 1.

This classification scheme is presented in six categories of EALs, which show the parameters for establishing each emergency classification.

The specific instruments, parameters or equipment statuses that identify the overall severity of the emergency condition and the actions to be taken by the facility staff are identified in the Plan Implementing Procedures. The Emergency Action Levels (EALs) are grouped into six categories to simplify their presentation and promote a rapid understanding by their users. (See Table D-1 for initiating conditions of each category). These categories are:

- (1) Abnormal Rad Release/Rad Effluent
- (2) Hazards
- (3) ISFSI
- (4) Systems
- (5) Fission Product Barriers
- (6) Cold Shutdown/Refueling System Malfunction

Table D-1, Description of Emergency Action Levels, provides a further breakdown of the types, events and parameter values and equipment status, which would cause the Plan to be implemented. The detailed emergency action levels are provided in a Plan Implementing Procedure.

3. **Offsite Classification Systems:**

Indian Point Energy Center works with the State of New York and local authorities to ensure consistency between classification schemes. The content of the Emergency Action Levels is reviewed with the State and local authorities on an annual basis.

Indian Point Energy Center Emergency Plan

4. Offsite Emergency Procedures:

Indian Point Energy Center works with the State of New York and local authorities to ensure that procedures are in place that provide for emergency actions to be taken which are consistent with the protective actions recommended by Indian Point Energy Center accounting for local offsite conditions that exist at the time of the emergency.

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Category	General Emergency	Site Area Emergency	Alert	Unusual Event
<p>A Abnormal RAD Release/RAD Effluent 1 Offsite RAD Conditions</p>	<p>Any valid radiation monitor reading > Table A-1 column "GE" for ≥ 15 min. (Note 1)</p> <p>Dose assessment using actual meteorology indicates doses > 1000 mRem TEDE or > 5000 mRem thyroid CDE at or beyond the site boundary.</p> <p>Field survey results indicate closed window dose rates > 1000 mRem/hr. expected to continue for ≥ 1 hr. at or beyond the site boundary</p> <p>OR</p> <p>Analyses of field survey samples indicate thyroid CDE of > 5000 mRem for 1 hr. of inhalation at or beyond the site boundary</p>	<p>Any valid radiation monitor reading > Table A-1 column "SAE" for ≥ 15 min. (Note 1)</p> <p>Dose assessment using actual meteorology indicates doses > 100 mRem TEDE or > 500 mRem thyroid CDE at or beyond the site boundary</p> <p>Field survey indicates closed window dose rate > 100 mRem/hr. that is expected to continue for ≥ 1 hr at or beyond the site boundary</p> <p>OR</p> <p>Field survey sample analysis indicates thyroid CDE of > 500 mRem for 1 hr. of inhalation at or beyond the site boundary</p>	<p>Any valid gaseous monitor reading > Table A-1 column "Alert" for ≥ 15 min. (Note 2)</p> <p>Any valid liquid monitor reading > Table A-1 column "Alert" for ≥ 15 min. (Note 2)</p> <p>Confirmed sample analyses for gaseous or liquid releases indicate concentrations of release rates > 200 X Technical Specification (ODCM) limits for ≥ 15 min. (Note2)</p>	<p>Any valid gaseous monitor reading > Table A-1 column "UE" for ≥ 60 min. (Note 2)</p> <p>Any valid liquid monitor reading > Table A-1 column "UE" for ≥ 60 min. (Note 2)</p> <p>Confirmed sample analyses for gaseous or liquid releases indicate concentrations or release rates > 2 X Technical Specifications (ODCM) limits for ≥ 60 min. (Note 2)</p>

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Category	General Emergency	Site Area Emergency	Alert	Unusual Event
<p>A</p> <p>Abnormal RAD Release/RAD Effluent</p> <p>2</p> <p>Onsite RAD Conditions & Irradiated Fuel Events</p>			<p>Damage to irradiated fuel or loss of water level (uncovering irradiated fuel outside the Reactor Vessel) that causes a valid high alarm on any of the following radiation monitors:</p> <ul style="list-style-type: none"> - R-2/R7 Vapor Containment Area Monitors - R-5 Fuel Storage Bldg. Area Monitors - R-42 [R-12] VC Gas Activity - R-25/R-26 Vapor Containment High Radiation Area Monitors <p>A water level drop in the reactor cavity, SFP or fuel transfer canal that will result in irradiated fuel becoming uncovered</p>	<p>Unplanned low water level or alarm indicating uncontrolled water level decrease in the refueling cavity, SFP or fuel transfer canal</p> <p>AND</p> <p>Valid area radiation monitor reading rise on any of the following:</p> <ul style="list-style-type: none"> - R-2/R-7 Vapor Containment Area Monitors - R-5 Fuel Storage Bldg. Area Monitors - R-25/R-26 Vapor Containment High Radiation Area Monitors <p>Unplanned valid area radiation monitor reading or survey results increase by a factor of 1,000 over normal levels*</p> <p>* Normal levels can be considered as the highest reading in the past 24 hours excluding the current peak value</p>

Indian Point Energy Center Emergency Plan
 Table D-1, Description of Emergency Action Levels

Category	General Emergency	Site Area Emergency	Alert	Unusual Event
A RAD Release/RAD Effluent 3 CR/CAS Radiation			Dose rates > 15 mRem/hr in areas requiring continuous occupancy to maintain plant safety functions: Control Room [R-1] OR CAS	

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Category	General Emergency	Site Area Emergency	Alert	Unusual Event
<p>H Hazards 1 Natural & Destructive Phenomena</p>			<p>Two or more annunciators are lit on the Peak Shock Annunciator panel, one of which is red AND Strong Motion Event Indicator is lit AND Earthquake confirmed by any of the following: - Earthquake felt in plant by a consensus of Control Room Operators - National Earthquake Information Center (Note 4) - Control Room indication of degraded performance of systems required for the safe shutdown of the plant</p> <p>Tornado striking or sustained high winds > 90 mph (40 m/sec) resulting in EITHER:</p> <p>Visible damage to any Table H-1 plant structures containing safety systems or components OR Control Room indication of degraded performance of safety systems</p> <p>Vehicle crash resulting in EITHER: Visible damage to any Table H-1 plant structures containing safety systems or components OR Control Room indication of degraded performance of safety systems</p>	<p>Seismic event identified by any two of the following: - Earthquake felt in plant by consensus of Control Room Operators - Unit 3 "Seismic Event Occurred" alarm (Panel SDF) or any amber Peak Shock Annunciator light is lit - National Earthquake information Center (Note 4)</p> <p>Tornado striking within Protected Area boundary OR Sustained high winds > 90 mph (40 m/sec)</p> <p>Turbine failure resulting in EITHER: Casing penetration OR Damage to turbine or generator seals Flooding in any Table H-1 area that has the potential to affect safety-related equipment needed for the current operating mode</p>

Indian Point Energy Center Emergency Plan
 Table D-1, Description of Emergency Action Levels

Category	General Emergency	Site Area Emergency	Alert	Unusual Event
<p>H Hazards 1 Natural & Destructive Phenomena</p>			<p>Turbine failure-generated projectiles resulting in EITHER: Visible damage to or penetration of any Table H-1 area containing safety systems or components</p> <p>OR</p> <p>Control Room indication of degraded performance of safety systems</p> <p>Flooding in any Table H-1 area resulting in EITHER: An electrical shock hazard that precludes necessary access to operate or monitor safety equipment</p> <p>OR</p> <p>Control Room indication of degraded performance of safety systems</p> <p>River Water Level > 15 ft. (ØMSL)</p> <p>OR</p> <p>Low Service Water Bay (Intake Structure) level resulting in a loss of service water flow</p>	<p>River Water Level > 14 ft. 6 in. (ØMSL)</p> <p>OR</p> <p>Service Water Bay (Intake Structure) water level < - 4 ft. 5 in. (ØMSL)</p>

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Category	General Emergency	Site Area Emergency	Alert	Unusual Event
H Hazards 2 Fire or Explosion			Fire or explosion resulting in EITHER: Visible damage to any Table H-1 area containing safety systems or components OR Control Room Indication of degraded performance of safety systems	Fire in any Table H-1 area not extinguished within 15 minutes (Note 3) of Control Room notification or verification of a control room fire alarm Explosion within Protected Area boundary
H Hazards 3 Hazardous Gas			Access to any Table H-2 area is prohibited due to toxic, corrosive, asphyxiant or flammable gases which jeopardize operation of systems required to maintain safe operations or safety shut down of the reactor	Toxic, corrosive, asphyxiant or flammable gases in amounts that have or could adversely affect normal plant operations Recommendation by local, county or state officials to evacuate or shelter site personnel based on offsite event
H Hazards 4 Security	A hostile action has occurred such that plant personnel are unable to operate equipment required to maintain safety functions OR A hostile action has caused failure of Spent Fuel Cooling Systems and imminent damage is likely	A hostile action is occurring or has occurred within the Protected Area as reported by the Security Shift Supervisor	A hostile action is occurring or has occurred within the Owner Controlled Area as reported by the Security Shift Supervisor OR A validated notification from the NRC of an airliner attack threat within 30 minutes of the site	A security condition that does not involve a hostile action as reported by the Security Shift Supervisor OR A credible site-specific security threat notification OR A validated notification from the NRC providing information of an aircraft threat

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Category	General Emergency	Site Area Emergency	Alert	Unusual Event
H Hazards 5 Control Room Evacuation		Control Room evacuation has been initiated AND Control of the plant cannot be established within 15 minutes	Control Room evacuation initiated	
H Hazards 6 Judgment	Other conditions exist that in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve EITHER : Actual or imminent substantial core degradation or melting with potential for loss of containment integrity OR Hostile action that results in an actual loss of physical control of the facility Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels (1 Rem TEDE and 5 Rem thyroid CDE) beyond the site boundary	Other conditions exist that in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve EITHER : An actual or likely major failures of plant functions needed for protection of the public OR Hostile action that results in intentional damage or malicious acts; 1) toward site personnel or equipment that could lead to the likely failure of or; 2) that prevent effective access to equipment needed for the protection of the public Any releases are not expected to result in exposure levels which exceed EPA Protective Action Guidelines exposure levels (1 Rem TEDE and 5 Rem thyroid CDE) beyond the site boundary	Other conditions exist that in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve EITHER : An actual or potential substantial degradation of the level of safety of the plant OR A security event that involves probable life threatening risk to site personnel or damage to site equipment because of hostile action Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels beyond the site boundary	Other conditions exist that in the judgment of the Emergency Director indicate that events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Category	General Emergency	Site Area Emergency	Alert	Unusual Event
E <i>ISFSI</i> 1 ISFSI				Damage to loaded cask confinement boundary
S System Malfunction 1 Loss of AC Power	Loss of all offsite and all onsite AC power (Table S-1) to 480 V safeguards buses (5A, 2A/3A, 6A) AND EITHER: Restoration of at least one safeguards bus within 4 hours is not likely OR Actual or imminent conditions requiring entry into ORANGE or RED path on F-0.2, " CORE COOLING "	Loss of all offsite and all onsite AC power (Table S-1) to 480 V safeguards buses (5A, 2A/3A, 6A) for ≥ 15 minutes (Note 3)	AC power capability to 480 V safeguards buses (5A, 2A/3A, 6A) reduced to a single power source (Table S-1) for ≥ 15 minutes (Note 3) such that any additional single failure would result in loss of all AC power to safeguard buses	Loss of all offsite AC power (Table S-1) to 480 V safeguards buses (5A, 2A/3A, 6A) for ≥ 15 minutes (Note 3)
S System Malfunction 2 ATWS Criticality	Failure of automatic and all manual trip signals to reduce power range $< 5\%$ AND Actual or imminent conditions requiring entry into EITHER: RED path in F-0.2, CORE COOLING	Failure of an automatic trip signal to reduce power range $< 5\%$ AND Manual trip actions taken at the reactor control console are not successful	Failure of an automatic trip signal to reduce power range $< 5\%$ AND Manual trip actions taken at the reactor control console are successful	Un planned sustained positive startup rate observed on nuclear instrumentation

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Category	General Emergency	Site Area Emergency	Alert	Unusual Event
S System Malfunction 3 Inability to Reach Shutdown Conditions				Plant is not brought to required operating mode within Technical Specifications LCO action statement time
S System Malfunction 4 Inst. / Comm.		Loss of > approximately 75% of Control Room overhead annunciators or Control Room indicators Table S-3 associated with safety systems AND Any significant transient is in progress, (Table S-2) AND Compensatory indications are unavailable	Unplanned loss of > approximately 75% of Control Room annunciators or Control Room indicators Table S-3 associated with safety systems for ≥ 15 minutes (Note 3) AND EITHER Any significant transient is in progress, (Table S-2) OR Compensatory indications are unavailable	Unplanned loss of > approximately 75% of Control Room annunciators or Control Room indicators Table S-3 associated with safety systems for ≥ 15 minutes (Note 3) Loss of all Table S-4 onsite (internal) communications capability affecting the ability to perform routine operations OR Loss of all Table S-4 offsite (external) communications capability affecting the ability to perform offsite communications

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Category	General Emergency	Site Area Emergency	Alert	Unusual Event
S System Malfunction 5 Fuel Clad Degradation				[Unit3: 1 (2) RM063A/B Gross Failed Fuel Detector High alarm (>50 μ Ci/gm) > 60 μ Ci/gm I-131 dose equivalent
S System Malfunction 6 RCS Leakage				Unidentified or pressure boundary leakage > 10 gpm OR Identified leakage > 25 gpm
S System Malfunction 7 Loss of DC Power		< 105 VDC bus voltage indications on all safety-related DC buses for \geq 15 minutes (Note 3)		
F Fission Product Barriers 1 Fission Product Barrier	Loss of any two barriers AND Loss or potential loss of third barrier (Table F-1)	Loss or potential loss of any two barriers (Table F-1)	Any loss or any potential loss of either Fuel Clad or RCS (Table F-1)	Any loss or any potential loss of Containment (Table F-1)

Indian Point Energy Center Emergency Plan

Table D-1, Description of Emergency Action Levels

Category	General Emergency	Site Area Emergency	Alert	Unusual Event
<p>C</p> <p>Cold Shutdown / Refuel System Malfunction</p> <p>2</p> <p>RPV Level</p>	<p>Reactor vessel level < top of active fuel (57' 9.6" elev. – RVLIS 56%) for ≥ 30 minutes (Note 3)</p> <p>AND</p> <p>Any Containment Challenge indication (Table C-5)</p> <p>Reactor vessel level cannot be monitored for ≥ 30 minutes with core uncover indicated by Any of the following (Note 3)</p> <ul style="list-style-type: none"> - Containment High Range Radiation Monitor reading upscale - Unexplained rise in Any Table C-1 sump tank level - Erratic Source Range Monitor <p>AND</p> <p>Any Containment Challenge indication Table C-5</p>	<p>With Containment Closure (Note 5) not established, reactor vessel level < 6" below the bottom of the RCS hot leg (59' 10.8" elev.- RVLIS 60.8%)</p> <p>With Containment Closure (Note 5) established, reactor vessel level < top of active fuel (57' 9.6" elev. RVLIS 56%)</p> <p>Reactor vessel level cannot be monitored for ≥ 30 minutes (Note 3) with a loss of inventory as indicated by any of the following:</p> <ul style="list-style-type: none"> - Containment High Range Radiation Monitor reading upscale - Unexplained rise in any Table C-1 sump/tank level- Erratic Source Range Monitor indication 	<p>Reactor vessel level < bottom of the RCS hot leg (60' 4.8" elev. – RVLIS 62%)</p> <p>OR</p> <p>Reactor vessel level Cannot be monitored for ≥ 15 minutes (Note 3) with unexplained rise in any Table C-1 sump/tank level</p>	<p>Inability to restore or maintain pressurizer level > 18% or RCS target level band due to RCS leakage for ≥ 15 minutes (Note 3)</p> <p>Unplanned reactor vessel level drop below vessel flange (69' elev. – RVLIS 83%) (or RCS target level band if the RCS level was procedurally being controlled below the vessel flange) for ≥ 15 minutes (Note 3)</p> <p>Reactor vessel level cannot be monitored with unexplained rise in any Table C-1 sump/tank level</p>

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Category	General Emergency	Site Area Emergency	Alert	Unusual Event
C Cold Shutdown / Refuel System Malfunction 3 RCS Temperature			ANY unplanned event resulting in RCS temperature > 200° F for > Table C-3 duration OR RCS pressure increase > 10 psig due to a loss of RCS cooling (not applicable to solid plant operations)	ANY unplanned event resulting in RCS temperature > 200° F due to loss of decay heat removal capability Loss of all RCS temperature and reactor vessel level indication for ≥ 15 minutes (Note 3)
C Cold Shutdown / Refuel System Malfunction 4 Communications				Loss of all Table C-2 onsite (internal) communications capability affecting the ability to perform routine operations OR Loss of all Table C-2 offsite (external) communications capability affecting the ability to perform offsite notifications
C Cold Shutdown / Refuel System Malfunction 5 Inadvertent Critically				Unplanned sustained positive startup rate observed on nuclear instrumentation

Indian Point Energy Center Emergency Plan
 Table D-1, Description of Emergency Action Levels

<p>C Cold Shutdown / Refuel System Malfunction</p> <p>7 Loss of DC Power</p>		<p>< 105 VDC bus voltage indications on all safety-related DC buses for \geq 15 minutes (Note 3)</p>		
<p>F Fission Product Barriers</p> <p>1 Fission Product Barrier</p>	<p>Loss of any two barriers AND Loss or potential loss of third barrier (Table F-1)</p>	<p>Loss or potential loss of any two barriers (Table F-1)</p>	<p>Any loss or any potential loss of either Fuel Clad or RCS (Table F-1)</p>	<p>Any loss or any potential loss of Containment (Table F-1)</p>

Indian Point Energy Center Emergency Plan
 Table D-1, Description of Emergency Action Levels

<p>C Cold Shutdown / Refuel System Malfunction 1 Loss of AC Power</p>			<p>Loss of all offsite and all onsite AC power (Table C-4) to 480 V safeguards buses (5A, 2A/3A, 6A) for \geq 15 minutes (Note 3)</p>	<p>AC power capability to 480 V safeguards buses (5A, 2A/3A, 6A) reduced to a single power source (Table C-4) for \geq 15 minutes such that any additional single failure would result in loss of all AC power to safeguard buses (Note 3)</p>
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Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

<p>C Cold Shutdown / Refuel System Malfunction 2 RPV Level</p>	<p>Reactor vessel level < top of active fuel (57' 9.6" elev. - RVLIS 56%) for ≥ 30 minutes (Note 3) AND Any Containment Challenge indication (Table C-5)</p> <p>Reactor vessel level cannot be monitored for ≥ 30 minutes with core uncover indicated by ANY of the following (Note 3)</p> <ul style="list-style-type: none"> - Containment High Range Radiation Monitor reading upscale - Unexplained rise in any Table C-1 sump/tank level - Erratic Source Range Monitor indication <p>AND Any Containment Challenge indication Table C-5</p>	<p>With Containment Closure (Note 5) not established, reactor vessel level < 6" below the bottom of the RCS hot leg (59' 10.8" elev. - RVLIS 60.8%)</p> <p>With Containment Closure (Note 5) established, reactor vessel level < top of active fuel (57' 9.6" elev. RVLIS 56%)</p> <p>Reactor vessel level cannot be monitored for ≥ 30 minutes (Note 3) with a loss of inventory as indicated by any of the following:</p> <ul style="list-style-type: none"> - Containment High Range Radiation Monitor reading upscale - Unexplained rise in any Table C-1 sump/tank level- Erratic Source Range Monitor indication 	<p>Reactor vessel level < bottom of the RCS hot leg (60' 4.8" elev. - RVLIS 62%) OR Reactor vessel level cannot be monitored for ≥ 15 minutes (Note 3) with unexplained rise in any Table C-1 sump/tank level</p>	<p>Inability to restore or maintain pressurizer level > 18% or RCS target level band due to RCS leakage for ≥ 15 minutes (Note 3)</p> <p>Unplanned reactor vessel level drop below vessel flange (69' elev. - RVLIS 83%) (or RCS target level band if the RCS level was procedurally being controlled below the vessel flange) for ≥ 15 minutes (Note 3)</p> <p>Reactor vessel level cannot be monitored with unexplained rise in any Table C-1 sump/tank level</p>
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Indian Point Energy Center Emergency Plan
 Table D-1, Description of Emergency Action Levels

<p>C Cold Shutdown / Refuel System Malfunction 3 RCS Temperature</p>			<p>ANY unplanned event resulting in RCS temperature > 200° F for > Table C-3 duration OR RCS pressure increase > 10 psig due to a loss of RCS cooling (not applicable to solid plant operations)</p>	<p>ANY unplanned event resulting in RCS temperature > 200° F due to loss of decay heat removal capability Loss of all RCS temperature and reactor vessel level indication for ≥15 minutes (Note 3)</p>
<p>C Cold Shutdown / Refuel System Malfunction 4 Communications</p>				<p>Loss of all Table C-2 onsite (internal) communications capability affecting the ability to perform routine operations OR Loss of all Table C-2 offsite (external) communications capability affecting the ability to perform offsite notifications</p>
<p>C Cold Shutdown / Refuel System Malfunction 5 Inadvertent Criticality</p>				<p>Unplanned sustained positive startup rate observed on nuclear instrumentation</p>

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

C Cold Shutdown / Refuel System Malfunction 6 Loss of DC Power				< 105 VDC bus voltage indications on all Technical Specification required 125 VDC buses for \geq 15 minutes (Note 3)
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Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Table A-1		Effluent Monitor Classification Thresholds			
Monitor		GE	SAE	Alert	UE
Gaseous	R-27	2.3E+00 $\mu\text{Ci/cc}$ (75 Ci/sec)	2.3E-01 $\mu\text{Ci/cc}$ (7.5 Ci/sec)	4.2E-02 $\mu\text{Ci/cc}$ (1.4 Ci/sec)	8.0E-03 $\mu\text{Ci/cc}$ (0.26 Ci/sec)
	R-44 [14]	N/A	N/A	4.2E-02 $\mu\text{Ci/cc}$	8.0E-03 $\mu\text{Ci/cc}$
Liquid	R-54 [18]	N/A	N/A	4.0E-02 $\mu\text{Ci/cc}$	2.5E-03 $\mu\text{Ci/cc}$
	R-49 [19]	N/A	N/A	5.8E-02 $\mu\text{Ci/cc}$	5.8E-04 $\mu\text{Ci/cc}$

Table H-1 Safe Shutdown Areas
<ul style="list-style-type: none"> • Control Buildings and associated Electrical Tunnels and Battery Rooms • Service Water Pump Structure and Valve Pits • Fuel Storage Building • Primary Auxiliary Building/Fan House • Vapor Containment Building • EDG Buildings • Auxiliary Feed-pump Building • Condensate Storage Tank • Refueling Water Storage Tank

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Table H-2 Safe Shutdown Access Areas

- Control Buildings and associated Electrical Tunnels and Battery Rooms
- Service Water Pump Structure and Valve Pits
- Vapor Containment Building
- Primary Auxiliary Building/Fan House
- Auxiliary Feed-pump Building

Indian Point Energy Center Emergency Plan
 Table D-1, Description of Emergency Action Levels

Table S-1 Safeguard Bus AC Power Sources		
Onsite		Offsite
Unit 2	<ul style="list-style-type: none"> * 480 V EDG 21 * 480 V EDG 22 * 480 V EDG 23 * Appendix R Diesel 	<ul style="list-style-type: none"> * Unit Auxiliary transformer* * Station Auxiliary transformer* * 13.8 KV gas turbine auto transformer* * * With 86P or 86BU tripped, all offsite power supplies must be considered as one power supply.
Unit 3	<ul style="list-style-type: none"> * 480V EDG 31 * 480V EDG 32 * 480V EDG 33 * Appendix R Diesel 	<ul style="list-style-type: none"> * Unit Auxiliary transformer * Station Auxiliary transformer * 13W92 feeder * 13W93 feeder

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Table S-2 Significant Transient

- Automatic turbine runback > 25% thermal reactor power
- Electrical load rejection > 25% full electrical load
- Reactor trip
- Safety injection activation
- Thermal power oscillations of > 10%

Table S-3 Safety System Indicators

- Reactivity Control
- RCS Inventory
- Decay Heat Removal
- Fission Product Barriers

Indian Point Energy Center Emergency Plan
 Table D-1, Description of Emergency Action Levels

Table S-4 Communications Systems		
System	Onsite (internal)	Offsite (external)
Plant Telephone System	X	X
Plant Radio System	X	
Page/Party System	X	
Radiological Emergency Communication System (RECS)		x
Emergency Notification System		X

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Table F-1 Fission Product Barrier Matrix							
	Fuel Cladding Barrier (FC)		Reactor Coolant System Barrier (RCS)		Containment Barrier (CNMT)		
	<input type="checkbox"/> Loss	<input type="checkbox"/> Potential Loss	<input type="checkbox"/> Loss	<input type="checkbox"/> Potential Loss	<input type="checkbox"/> Loss	<input type="checkbox"/> Potential Loss	
A. CSFST	<input type="checkbox"/> 1. Core-Cooling entry conditions met	<input type="checkbox"/> 1. Core Cooling - entry conditions met OR Heat Sink - entry conditions met and heat sink is required		<input type="checkbox"/> 1. Integrity - entry conditions met OR Heat Sink - entry conditions met and heat sink is required		<input type="checkbox"/> 1. Containment - entry conditions met	
B. Core Exit TCs	<input type="checkbox"/> 2. Core exit TCs > 1,200°F	<input type="checkbox"/> 2. Core exit TCs [Unit 2] > 700°F [Unit 1] > 715°F				<input type="checkbox"/> 2. Core exit TCs > 1,200°F AND Core exit TCs not lowering within 15 minutes after restoration procedure entry <input type="checkbox"/> 3. Core exit TCs [Unit 2] > 700°F [Unit 1] > 715°F AND RVLIS [Unit 2] < 41% [Unit 1] < 33% w no RCPs AND Core exit TCs not lowering or RVLIS not rising within 15 minutes after restoration procedure entry	
C. Radiation	<input type="checkbox"/> 3. Containment radiation monitor R-25 or R-26 > 17 R/hr		<input type="checkbox"/> 1. [Unit 2] R-41 > 1.2E-5 µCi/cc or R-42 > 1.0E-2 µCi/cc [Unit 1] R-11 > 1.2E-5 µCi/cc or R-12 > 5.0E-2 µCi/cc			<input type="checkbox"/> 4. Containment radiation monitor R-25 or R-26 > 88 R/hr	
D. Inventory		<input type="checkbox"/> 3. RVLIS [Unit 2] < 41% [Unit 1] < 33% with no RCPs running	<input type="checkbox"/> 2. RCS leak rate resulting in a loss of RCS subcooling (< Table F-2) <input type="checkbox"/> 3. Ruptured SG results in an ECCS (SI) actuation	<input type="checkbox"/> 2. RCS leak rate indicated greater than 87 gpm	<input type="checkbox"/> 1. A Containment pressure rise followed by a rapid unexplained drop in Containment pressure <input type="checkbox"/> 2. Containment pressure or sump level response not consistent with LOCA conditions <input type="checkbox"/> 3. Ruptured SG faulted outside of containment <input type="checkbox"/> 4. Primary-to-secondary leak rate > 10 gpm AND Unisolable steam release from affected SG to the environment	<input type="checkbox"/> 5. Containment pressure > 47 psig and rising <input type="checkbox"/> 6. Containment hydrogen concentration ≥ 4% <input type="checkbox"/> 7. Containment pressure > Phase B isolation signal setpoint following LOCA AND Less than Table F-3 depressurization equipment operating as designed	
E. Other	<input type="checkbox"/> 4. Primary coolant activity > 300 µCi/gm I-131 dose equivalent				<input type="checkbox"/> 5. Inability to isolate all valves in any one line AND Direct downstream pathway to the environment exists after containment isolation signal		
F. Judgment	<input type="checkbox"/> 5. Any condition in the opinion of the Emergency Director that indicates loss of the Fuel Clad barrier	<input type="checkbox"/> 4. Any condition in the opinion of the Emergency Director that indicates potential loss of the Fuel Clad barrier	<input type="checkbox"/> 4. Any condition in the opinion of the Emergency Director that indicates loss of the RCS barrier	<input type="checkbox"/> 3. Any condition in the opinion of the Emergency Director that indicates potential loss of the RCS barrier	<input type="checkbox"/> 6. Any condition in the opinion of the Emergency Director that indicates loss of the Containment barrier	<input type="checkbox"/> 8. Any condition in the opinion of the Emergency Director that indicates potential loss of the Containment barrier	

Indian Point Energy Center Emergency Plan
 Table D-1, Description of Emergency Action Levels

Table F-2 RCS Sub-cooling			
	RCS Pressure (PSIG)	Sub-cooling (°F)	
		Non-adverse Containment	Adverse Containment
Unit 2	0 – 400	52	83
	401 – 800	36	49
	801 – 1200	23	30
	1201 - 2500	19	26
Unit 3	< 1000	40	112
	1000 – 1900	40	78
	> 1900	40	63

Table F-3 Minimum Containment Cooling Systems	
FCUs	Spray Pumps
< 3	2
3	1
5	0

Table C-1 Sumps / Tanks
<ul style="list-style-type: none"> • Containment sumps • CCW surge tank • PRT • RCDT

Indian Point Energy Center Emergency Plan
Table D-1, Description of Emergency Action Levels

Table C-2 Communications Systems		
System	Onsite (internal)	Offsite (external)
Plant Telephone System	X	X
Plant Radio System	X	
Page/Party System	X	
Radiological Emergency Communication System (RECS)		X
Emergency Notification System (ENS)		X

Table C-3 – RCS Reheat Duration Thresholds		
RCS	Containment Closure	Duration
Intact and not Reduced Inventory	N/A	60 minutes*
Not Intact OR Reduced Inventory	Established	20 minutes*
	Not Established	0 minutes
* If an RCS heat removal system is in operation within this time frame and RCS temperature is being reduced, this EAL is not applicable.		

Table C-4 Safeguard Bus AC Power Sources		
Onsite		Offsite
Unit 2	<ul style="list-style-type: none"> * 480 V EDG 21 * 480 V EDG 22 * 480 V EDG 23 * Appendix R Diesel 	<ul style="list-style-type: none"> * Unit Auxiliary transformer* * Station Auxiliary transformer* * 13.8 KV gas turbine auto transformer* * * With 86P or 86BU tripped, all offsite power supplies must be considered as one power supply.
Unit 3	<ul style="list-style-type: none"> * 480V EDG 31 * 480V EDG 32 * 480V EDG 33 * Appendix R Diesel 	<ul style="list-style-type: none"> * Unit Auxiliary transformer * Station Auxiliary transformer * 13W92 feeder * 13W93 feeder

Part 2: PLANNING STANDARDS AND CRITERIA

Section E: Notification Methods and Procedures

This section describes the notification of State and local response organizations and Indian Point Energy Center emergency response personnel. It outlines the content of initial and follow-up messages to response organizations within the Indian Point Energy Center (Units 1,2 & 3) Plume Exposure Pathway Emergency Planning Zone (EPZ).

1. Response Organization Notification:

Indian Point Energy Center, in cooperation with State and local authorities, has established mutually agreeable methods for notification of response organizations consistent with the emergency classification and action level scheme. Notification methods to offsite agencies include a means of verification or authentication such as the use of dedicated communications networks or providing call back verification phone numbers.

Emergency events that involve both Units (2&3) (i.e., tornado or earthquake) and when the classification for each Unit is the same, shall be reported as affecting both Units.

In situations when both Units are affected by emergency events, but the events are not related or the classification for each Unit is different, notification will be made for the highest classification. Clarification of the relationship between the classification levels determined for the Units should be provided in the periodic updates.

The emergency conditions classified in Section D involve the alerting or activation of progressively larger segments of the total emergency organization. This section describes the communication steps taken to alert and activate authorities for each classification of emergency.

a. Notification of Unusual Event

- 1) A Notification of Unusual Event is declared by the Shift Manager (or Control Room Supervisor if the SM is unavailable) if any Unusual Event threshold listed in the EALs, Table (Section D) is met or exceeded.
- 2) Depending on the particular circumstances of the situation, the Control Room Operator under the Shift Manager's direction alerts the affected Unit's personnel and non-affected Unit's Control Room personnel and gives instructions regarding the event, using the public address system, the telephone or by an alternate method. Distinctive sounding signals are used to announce fire alarms or site emergencies.
- 3) Depending on the particular circumstance of the situation, the Shift Manager has the discretion to activate all or a portion of the ERO. During normal working hours the necessary personnel are available in the plant and are contacted by Public Address System, an electronic notification system or alternate methods. During off-hours individuals can be contacted at their homes by telephone or electronic notification system. ERO member telephone numbers are in the

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Emergency Telephone Directory available in the Control Rooms and Emergency Response Facilities.

- 4) Immediate Notification (within 15 minutes) of an Unusual Event is made by the Shift Manager or his designee to the New York State, Westchester, Rockland, Putnam and Orange County and Peekskill Warning Points, and the West Point Military Police Desk using the Radiological Emergency Communications System (RECS) phone (primary method) or backup methods: Local Government Radio (LGR) or commercial phone lines. The New York State Warning Point relays the information to the New York State Department of Health.
- 5) The Nuclear Regulatory Commission's Operations Center is notified using the Emergency Notification System (ENS) phone or commercial phone lines.
- 6) Individuals from Corporate Headquarters are notified by phone or electronic notification system.
- 7) Closeout is accomplished by a verbal summary to offsite authorities followed by a written summary within 24 hours.

b. Alert

- 1) An Alert is declared by the Shift Manager (or Control Room Supervisor if the SM is unavailable) in the event an alert condition listed in the EALs Table (Section D) is met or exceeded. If the EOF is Operational, this function would be performed by the Emergency Director.
- 2) Notification of site personnel is accomplished by the Control Room Operators initiating the site assembly alarm and/or via the Public Address Announcements. In addition, the affected unit's Control Room Operators also contact the unaffected unit's Control Room personnel.
- 3) In the case of a fire, additional notification in the form of a distinctive siren is also provided. The Shift Manager or designee would request, by phone, outside assistance from local support services as necessary.
- 4) The Shift Manager initiates the activation of the Emergency Operations Facility, Technical Support Center, Operations Support Center and Joint Information Center. During normal working hours the necessary personnel are available in the plant and are contacted by the Public Address System, or electronic notification system. During off-hours individuals can be contacted at their homes by telephone or electronic notification system. ERO member telephone numbers are in the Emergency Telephone Directory available in the Control Rooms and Emergency Response Facilities.

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- 5) Immediate Notification (within 15 minutes) of an Alert is made by the Shift Manager or his designee to the New York State, Westchester, Rockland, Putnam, Orange County, and Peekskill Warning Points and West Point Military Police Desk using the Radiological Emergency Communications System (RECS) phone (primary method) or backup methods: Local Government Radio (LGR) or commercial phone lines. The New York State Warning Point relays the information to the New York State Department of Health.
 - 6) Nuclear Regulatory Commission's Operations Center is notified using the Emergency Notification System (ENS) to the NRC Operations Center or commercial phone lines.
 - 7) Individuals from Corporate Headquarters are notified by phone or pager.
 - 8) If there is a radiological release involved with the event, the Shift Manager/Emergency Director or his designee will provide information on the release to the offsite authorities.
 - 9) Close out in emergency class is accomplished by the briefing of offsite authorities at the Emergency Operations Facility and by phone, followed by a written summary within eight hours.
- c. Site Area Emergency
- 1) A Site Area Emergency is declared by the Shift Manager (or Control Room Supervisor if the SM is unavailable) in the event a site area emergency condition listed in the EALs Table (Section D) is met or exceeded. If the EOF is Operational, this function would be performed by the Emergency Director.
 - 2) Notification of site personnel is accomplished by the Control Room Operator initiating the Site Assembly Alarm or use of the public address system. Accountability of personnel located within the Protected Area is performed. In addition the unaffected Control Room Personnel are contacted by the affected Control Room Operators.
 - 3) The activation of emergency personnel to staff the Emergency Operations Facility, Technical Support Center, Operational Support Center and Joint Information Center is initiated by the Shift Manager. The minimum organization is described in Section B. During normal working hours the necessary personnel are available in the plant and are contacted by the Public Address System, or electronic notification system. During off-hours individuals can be contacted at their homes by telephone or electronic notification system. Telephone numbers of Emergency Personnel are in the emergency phone list available in the Control Room and the Emergency Response Facilities.
 - 4) Individuals from Corporate Headquarters are notified by phone or pager.
 - 5) Immediate Notification (within 15 minutes) of a Site Area Emergency is made by the Shift Manager/Emergency Director or his designee to the New York State, Westchester, Rockland, Putnam and Orange County and Peekskill Warning Points, and the West Point Military Police Desk using the Radiological Emergency Communications System (RECS) phone (primary method) or

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backup methods: Local Government Radio (LGR) or commercial phone lines. The New York State Warning Point relays the information to the New York State Department of Health.

- 6) Nuclear Regulatory Commission's Operations Center is notified using the Emergency Notification System (ENS) to the NRC Operations Center or commercial phone lines.
 - 7) After arrival of ERO personnel, dedicated individuals would be assigned to provide plant status and meteorological and dose estimates for actual and projected releases.
 - 8) If there is a radiological release involved with the event, the Shift Manager/Emergency Director or his designee shall provide information on the release to the offsite authorities.
 - 9) Close out in emergency class is accomplished by the briefing of offsite authorities at the Emergency Operations Facility and by phone, followed by a written summary within eight hours.
- d. General Emergency
- 1) A General Emergency is declared by the Shift Manager (or Control Room Supervisor if the SM is unavailable) in the event a general emergency condition listed in the EALs Table (Section D) is met or exceeded. If the EOF is Operational, this function would be performed by the Emergency Director.
 - 2) The activation of the emergency organization, the notification of offsite authorities, Station Personnel, Corporate Headquarters is the same as described in Section E.1.c for a Site Area Emergency – with the addition of a Protective Action Recommendation being given.

2. Notification and Mobilization of Emergency Response Personnel:

At the Unusual Event classification, select portions of the Indian Point Emergency Response Organization (ERO) are notified and can be activated at the discretion of the Shift Manager.

At the Alert, Site Area Emergency, or General Emergency classification level, notification and activation of all onsite Emergency Response Organization positions and related facilities is required. Based on the event the Emergency Director would de-activate some positions or call in additional personnel as required.

Onsite personnel are notified of the declaration, escalation or termination of an emergency. An announcement is made from the Control Room over the plant public address system. In addition to the public address system, electronic notification system or alternate methods are used to notify the Emergency Response Organization.

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NOTE: NUREG-0654 Criterion II.B.5 states that the "licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency". The time frames for rapid augmentation of a nuclear power plant staff in the event of an emergency are not rigid inviolate requirements but rather goals. It is Entergy's intent to expend its best efforts to meet the augmentation criteria goals regarding staffing Emergency Response Facilities with sufficiently skilled individuals capable of handling an emergency. Both the NRC and Entergy realize that due to diversity of normal residential patterns for the stations' staff, possible adverse weather conditions and road congestion, these time frames might be exceeded. These time frames may also be exceeded during a Security event.

ERO members who are away from the site when an event is declared are notified via an electronic notification system and/or phone calls. An automated notification system makes individual calls to members of the ERO. Once notified, ERO members respond to their assigned facilities immediately.

Mobilization of federal, state, and county response organizations is performed in accordance with their applicable emergency plan and procedures. At a minimum, mobilization of federal response organizations and activation of state and county EOCs is expected to occur at the declaration of an Alert.

The state and county authorities are responsible for the process of notification of their personnel and the general public.

3. Initial Notification:

An Initial Notification using Part I of the New York State Radiological Emergency Data Form shall be used to transmit information to appropriate State and local agencies within fifteen (15) minutes of any of the following:

- A classification is made;
- The classification changes;
- A change in radioactive release condition;
- A change in the downwind sector when a release is potential or occurring;
- A change is made in Protective Action Recommendations; and
- Additional information is available which may affect a change in the State or local protective action response.

The initial emergency message form includes information about:

- a) authenticity, i.e. "This is NOT an Exercise (Drill)" or "This is an Exercise (Drill)";
- b) identity of caller and receiver of call;
- c) emergency classification;
- d) emergency action level identification and whether a release is in progress;
- e) wind direction, speed and stability class;

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- f) recommended protective measures if necessary;
- g) the date and time of classification and notification.

In a General Emergency the notification includes, at a minimum, a recommendation for evacuation of the general public within the two (2) mile ring of Indian Point Energy Center and five (5) miles downwind, and implement the NY State KI plan. All Remaining areas should monitor the Emergency Alert System.

4. Follow-up Messages:

The Emergency Director ensures communications are maintained with the offsite authorities through periodic follow-up messages. Follow-up message should be provided approximately every 30 minutes or on agreed upon intervals established with the offsite authorities. The follow-up messages include the following, as appropriate:

- a. Location of incident, name and telephone number of caller;
- b. Date and time of incident;
- c. Class of Emergency. (Unusual Event, Alert, Site Area Emergency or General Emergency);
- d. Type of actual or potential radiological release (airborne, waterborne, surface spill);
- e. Whether or not [estimate of quantity of] radioactive material has been released or is being released;
- f. Radiological release information, including estimates of the relative quantities and concentrations of noble gases, halogens, and particulates;
- g. Meteorological conditions at appropriate levels (wind speed, direction to and from, stability);
- h. Actual or projected dose rates at the site boundary, projected integrated dose at site boundary;
- i. Projected dose rates and integrated dose at the Site Boundary and at 2, 5, and 10 miles;
- j. Estimates of any surface contamination if applicable;
- k. Recommended emergency actions, including protective measures;
- l. Prognosis for worsening or improvement.

5. State and Local Information Dissemination:

State and local government organizations, in cooperation with Indian Point Energy Center personnel, have established a system for disseminating appropriate information to the public. The system includes notification through appropriate broadcast media, e.g. the Emergency Alerting System (EAS).

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6. Notification of the Public:

The State and local government organizations have the capability for providing an alert signal (sirens) to their population within fifteen (15) minutes following the decision to take a protective action.

The public Alert Notification System (ANS) is operated by local government agencies and maintained by Entergy. The design of the ANS includes backup power capability in accordance with NRC Order EA-05-190, dated January 31, 2006 (Section IV.II: A1 – A5 and B1 – B3). In cooperation with offsite agencies Entergy personnel test the system periodically. System testing and preventive maintenance requirements include those specified in Section IV.II: A6 and C4 – C5 of the Order. Any system discrepancies are promptly repaired.

The public Alert Notification System (ANS) is composed of 172 sirens and the RECS phone for the US Military Academy. These are supplemented with individual alerting devices for residences and special facilities in EPZ areas where acoustic coverage is reduced.

The sirens are electronic. They are activated from each County EOC or Warning Point via simultaneous radio and TCP/IP signals. The county EOCs and Warning Points and IPEC have the same capability for siren activation.

The system design consists of 172 sirens with a distribution as follows:

- Westchester - 77
- Rockland - 56
- Orange - 23
- Putnam - 16

Periodic testing and maintenance of the ANS is performed in accordance with approved procedures. Periodic testing includes:

- Bi-weekly silent test – intended to check computer equipment, radio transmitter/repeater and siren receiver.
- Quarterly growl test – intended to test the siren sub-system from receiver antenna to siren (satisfies the requirement of the bi-weekly silent test).
- Annual activation test – intended to test the actuation and operation of the siren system (satisfies the requirements of the bi-weekly silent test) at full volume for a period of approximately 3 – 5 minutes.

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Tone Alert Radios are distributed within the 10-mile EPZ to supplement siren alerting for residents and special facilities in EPZ areas where acoustic coverage is reduced or when requested. On an annual basis, guidance is provided on the use and testing of the tone alert radios.

Given that automated dialing is an accepted method that can be selected to provide primary alerting in accordance with FEMA-REP-10 guidance in consultation with New York State, Westchester, Rockland, Orange and Putnam Counties, the plan is to use "*automated dialing*" capability as the back-up method of alert and notification in the case of a siren failure.

7. Messages to the Public:

The State has developed draft messages for the Emergency Alerting System (EAS) that are intended for the public. These draft messages are included as part of the State plan and contain instructions with regard to specific protective actions to be taken by occupants and visitors of affected areas.

Messages to the public are also provided via the Media. These messages are coordinated by utility, Federal, State and local representatives at the Joint Information Center.

Part 2: PLANNING STANDARDS AND CRITERIA

Section F: Emergency Communications

This section describes the emergency communications equipment available to support the Indian Point Energy Center (Indian Point) Emergency Response Organization (ERO). It outlines the available communications equipment to:

- Notify the Indian Point Emergency Response Organizations;
- Provide Initial Notification to Offsite governmental agencies;
- Communicate among the Indian Point Emergency Response Facilities and field teams;
- Communicate with the Nuclear Regulatory Commission (NRC) and other Federal, State, and local response agencies;
- Communicate with hospitals, ambulances, and other agencies providing offsite assistance to Indian Point Energy Center.

This section further outlines the program for insuring that the communications equipment is tested on a regular schedule, and that methods are in place to ensure rapid and reliable repair of any equipment found not operational.

1. Description of Primary Communications Systems

Communications may be established by different means (radio, phone, public address system) within plant buildings, between the Site and local authorities and between the following groups: Control Room personnel, offsite support groups, Emergency Operations Facility personnel, Technical Support Center personnel, Operations Support Center personnel, Joint Information Center personnel, monitoring teams, security forces and Corporate Management.

Public Address System

The Public Address Systems are designed for paging within the Units (1, 2 and 3) from the Units' Control Rooms. Personnel paged have the ability to talk to the Control Room Operator via party line phones that are strategically located within the units. Plant personnel may initiate the communication to the Control Room from outlying party lines. This system is used to call personnel and announce emergencies in the Indian Point Energy Center Protected Area(s).

In the event the Public Address system is not operational, alternate methods of notification will be used.

Telephone Exchanges

Normal telephone communication service includes Private Branch (PBX), Commercial and/or Federal Telephone System (FTS) exchanges in the Control Rooms, Emergency Operations Facility, Technical Support Center, Operations Support Center, Joint Information Center, Incident Command Post and Corporate Headquarters.

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The Emergency Notification System (ENS) and the Health Physics Network (HPN) are dial telephone circuits in the Federal Telecommunication System used for the dissemination of operational conditions as well as the initial warning notification from the site to the NRC. This system has extensions at the Control Rooms, Technical Support Center, Emergency Operations Facility and Alternate Emergency Operations Facility. Additional FTS2000 lines are available in the Emergency Operations Facility for NRC personnel responding to the site.

Direct Line Phones

Radiological Emergency Communications System (RECS) and the Emergency Response Facility direct lines.

- The Radiological Emergency Communication System (RECS) with phones in the Control Rooms and the Emergency Operations Facility is the primary means for Indian Point Energy Center personnel to simultaneously notify the State and County Warning Points, Emergency Operations Centers, West Point and the City of Peekskill of an emergency. This system is staffed twenty-four hours per day in the Control Rooms, State, County, City of Peekskill and West Point Warning Points. IPEC Implementing Procedures and State and County Warning Point procedures detail the activation of this system and their respective responses organization.

Figure F-1.1 depicts RECS.

- Automatic ringing phones connect the Technical Support Center/Operations Support Center with the Control Rooms and the Emergency Operations Facility/Alternate EOF.
- An Executive Hotline has been established between the EOF and the State and County Emergency Operations Centers that provides for a dedicated link between state and local officials and the Emergency Director once the EOF has taken command and control of Entergy's emergency response.

Radio Systems

A two-channel radio system is available for communication between the emergency facilities and individuals onsite. One channel is assigned for each unit to communicate with individuals performing tasks within the plant.

An additional radio channel is available for communications with the Field Monitoring Teams.

The Security Force connecting the Command Guard Houses with all guard posts uses a security radio system.

The Local Government Radio (LGR) is installed in the Control Rooms and Emergency Operations Facilities to be used as backup to the Radiological Emergency Communications System (RECS) phone. Figure F-1.2 depicts the LGR system.

Backup power for the IPEC Emergency Response Facilities radio systems is provided by either gas or diesel engine driven generators or batteries that will automatically supply AC power for the radio system if normal power is interrupted.

Electronic Notification System

A commercial electronic notification service is used for contacting personnel at the start of an emergency. When activated by station personnel, the notification service transmits a message via various communications pathways to all ERO personnel to report to their assigned ERO facilities.

Computer Systems

The Emergency Response Data System (ERDS) is a computer link from Indian Point Energy Center to the NRC Operations Center that displays key plant data. ERDS will be activated at an Alert or higher classification.

Other computer systems have been established to display plant data and meteorological data in the onsite and offsite Emergency Response Facilities.

Additional Communications:

Indian Point Emergency Response Facilities are equipped to communicate with state and county Emergency Operations Centers once the Emergency Response Organizations are in place.

- a. The Nuclear Regulatory Commission is Indian Point's primary point of contact for communications with the Federal Emergency Response Organization. (see Figure F-1.3 for types of communications systems used.)
- b. The communications described in this section provide for adequate communications between Indian Point Emergency Response Facilities. Implementing procedures provide guidance for the ERO to establish and maintain proper communications throughout an event at Indian Point Energy Center.
- c. Section E.2 describes the provisions for alerting and activating the Emergency Response Organization.
- d. Procedures are in place for the ERO to continuously provide information to the NRC as requested.

Indian Point Energy Center Emergency Plan

Medical Communications:

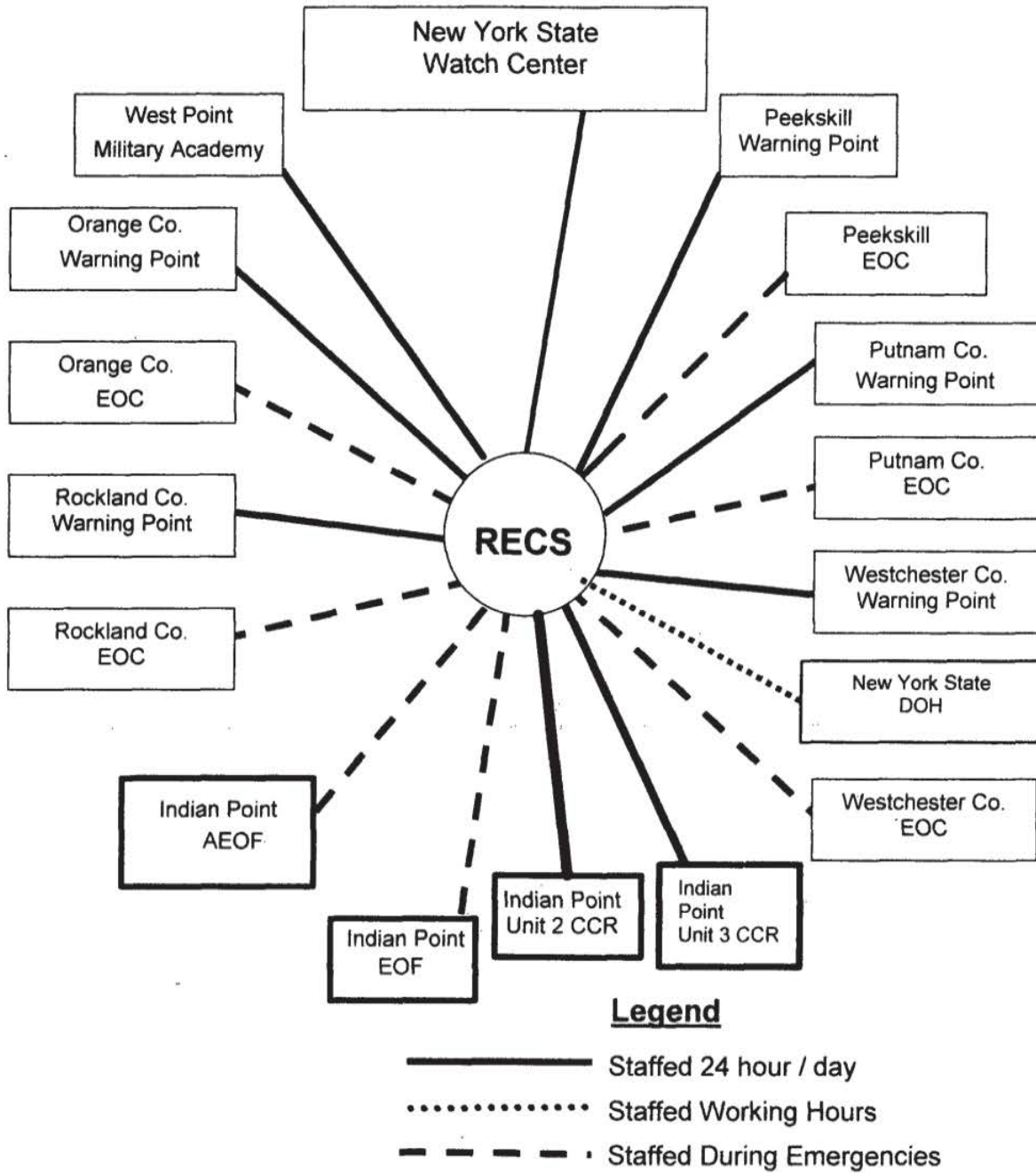
Indian Point Energy Center establishes communications with the primary medical supplier, Hudson Valley Hospital Center, Peekskill/Cortlandt, and if needed the backup hospital, Phelps Memorial, Sleepy Hollow, via commercial telephone that is accessed by station personnel either via commercial onsite telephone or by an Indian Point Energy Center telephone system. The Unit 2 Control Room, by calling 911, obtains direct ambulance dispatch. The Dispatcher provides for a coordinated communications link to the ambulances responding to Indian Point Energy Center or transporting personnel from the Station.

Communications Drills and Testing:

Communications drills between Indian Point Energy Center and state and local governments are conducted in accordance with criteria contained in Section N.2. Also, Indian Point Energy Center personnel conduct monthly and quarterly surveillances to determine the working condition and availability of critical communications equipment. This surveillance includes a check of the units' operability and general condition. Deficiencies are identified and reported for prompt corrective action.

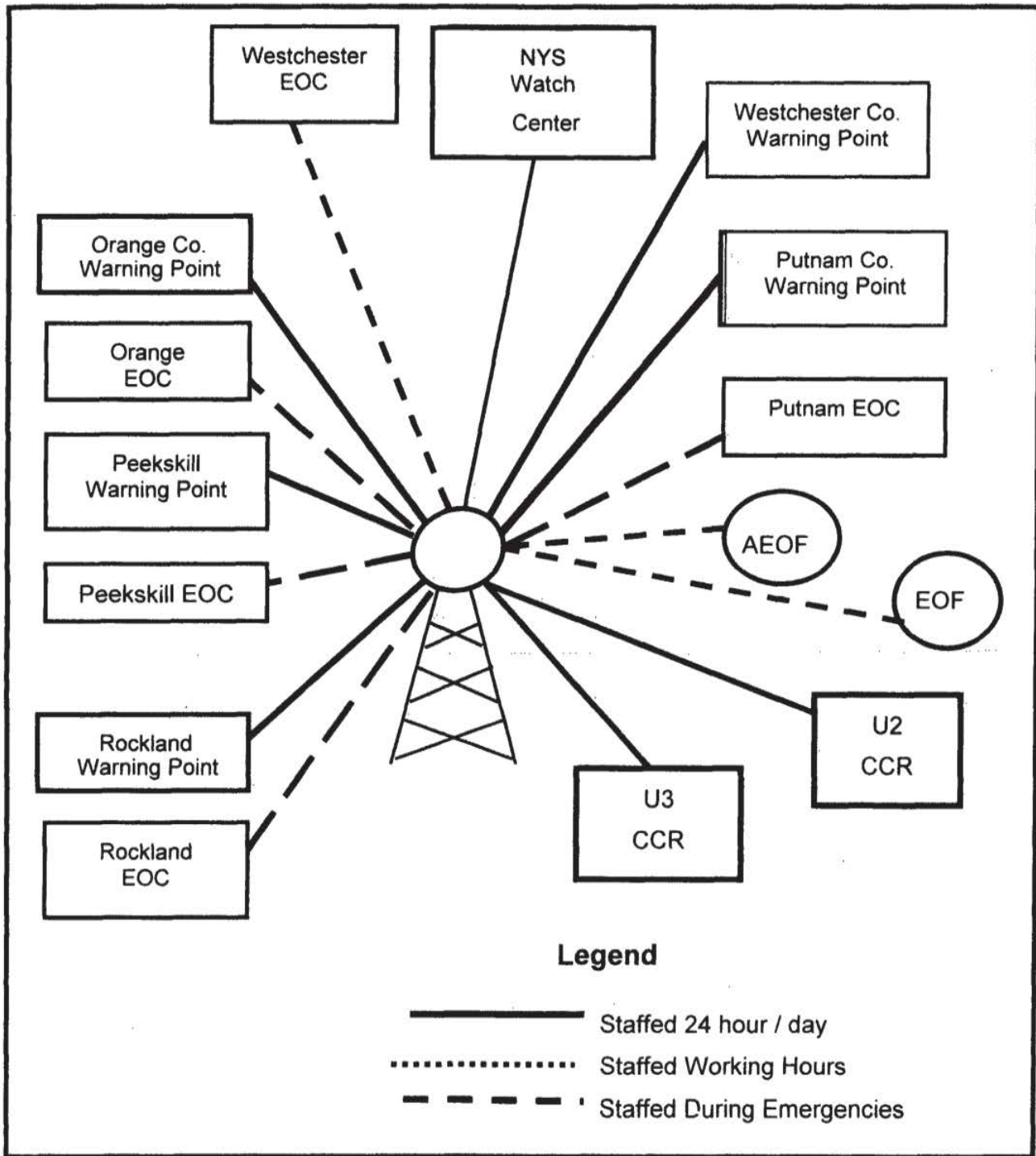
Indian Point Energy Center Emergency Plan
 Typical Indian Point Communications Paths

Figure F-1.1 Radiological Emergency Communications System

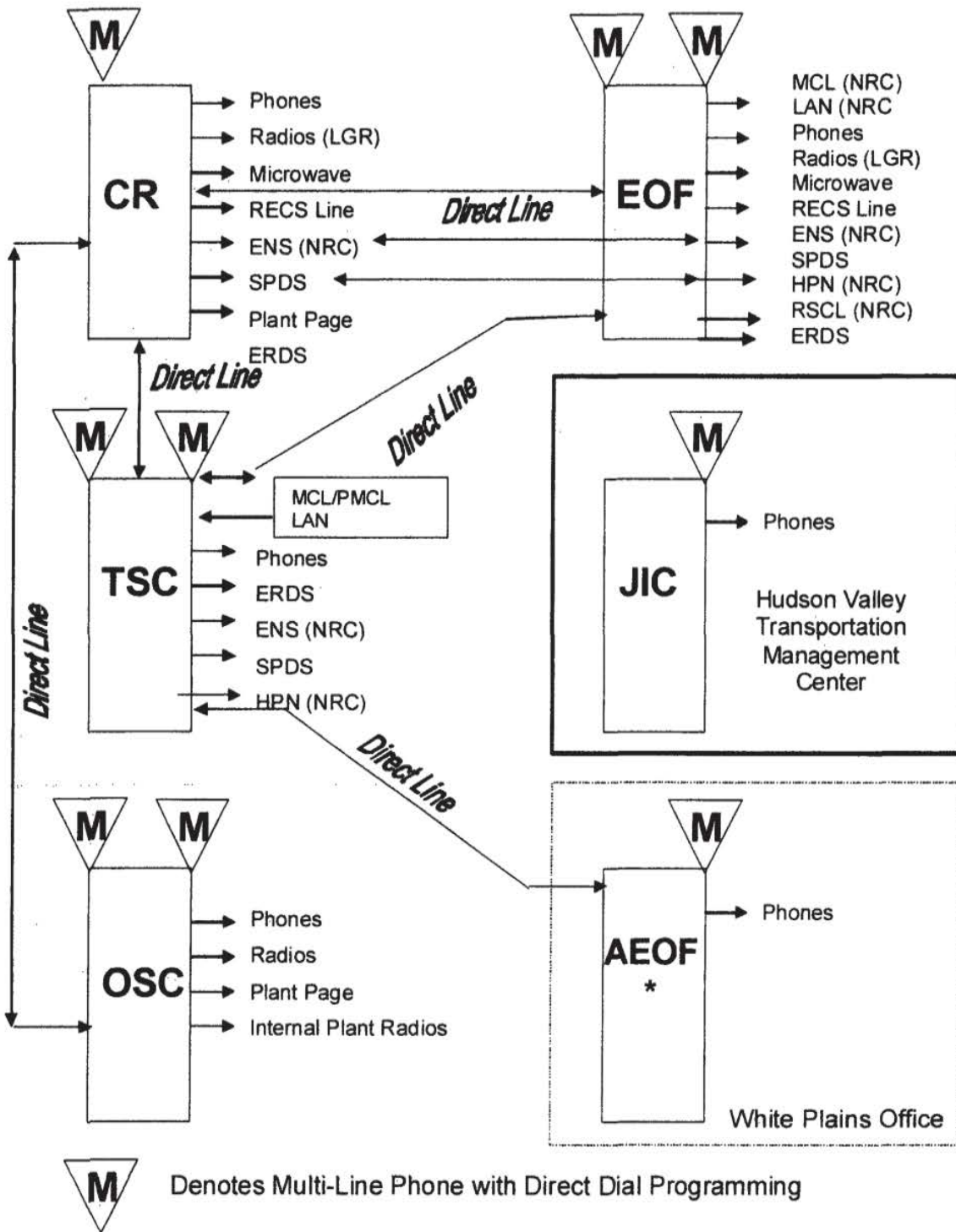


Indian Point Energy Center Emergency Plan
Typical Indian Point Communications Paths

Figure F-1.2 Local Government Radio System



Indian Point Energy Center Emergency Plan
 Typical Indian Point Communications Paths



* When the AEOF is activated in the White Plains Office, it has similar communications capabilities as the EOF.

Figure F-1.3 Emergency Facilities Communications Systems

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Section G: Public Education and Information

This section describes the Indian Point Energy Center public education and information program. It outlines the methods for distributing public information materials on an annual basis and describes how the public is informed in the event of an emergency.

1. Public Information Publication:

Entergy, New York State and the counties of Westchester, Orange, Rockland and Putnam, are responsible for the periodic dissemination of educational information to the public within the 10-mile Emergency Planning Zone (EPZ).

County-specific emergency planning educational booklets are provided to the public. The booklets contain public safety information about emergencies at Indian Point Energy Center and what the public may be asked to do in an emergency. The booklets are mailed to each household and business within the 10-mile EPZ.

Updated booklets will be distributed annually.

The booklet contents include, but are not limited to:

- a. Educational information on radiation;
- b. The types of events which require public notifications;
- c. State and county contacts for additional information;
- d. Instructions for the members of the public with special needs;
- e. Definitions of protective measures, written descriptions of emergency bus routes, locations of reception centers, steps to follow when sheltering or evacuating;

2. Public Education Materials:

Additionally, an advertisement containing specific information is prepared and inserted into telephone books. Siren information stickers/posters are distributed to provide information for the transient population.

These materials instruct the public to tune their radios or television to an Emergency Alert System station when they hear the Alert Notification System (sirens). The materials identify the local radio and television stations which the public should tune into to receive emergency-related information.

Distribution of materials, updated as necessary, will be conducted annually.

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3. Joint Information Center

- a. The Joint Information Center (JIC) is the official distribution point for the coordinated release of information from the four counties of Westchester, Rockland, Putnam and Orange, the State of New York, and Entergy's Indian Point Energy Center. The JIC is located outside the plume exposure emergency planning zone at the Hudson Valley Transportation Management Center, 200 Bradhurst Avenue in Hawthorne, NY.

The JIC's primary functions are to:

- Provide information to the media, through briefings or written statements on plant conditions and on emergency response actions being taken to protect the public.
 - Ensure that the public receives credible, accurate and timely information, and to identify and correct rumors or misinformation through coordinated public inquiry functions, as well as via coordinated media referral and media monitoring response operations.
 - Support further distribution of Emergency Alert System (EAS) emergency advisories to the public in the 10-mile Emergency Planning Zone (EPZ).
- b. The JIC can accommodate federal, state and local government representatives as well as news media representatives. State and local government representatives can all access the JIC through virtual connections such as video or teleconference capabilities.
 - c. The JIC is equipped to support all activities including video conferencing computers, fax machines and copiers.
 - d. JIC procedures allow Entergy JIC staff to disseminate information to the media at the Unusual Event classification or prior to activation of the JIC at higher classifications.

4. Coordination of Public Information

- a. The Entergy Company Spokesperson is the primary spokesperson for Entergy during an emergency. The Company Spokesperson has direct access to all necessary information.
- b. The JIC is staffed by federal and state emergency management agencies and Entergy personnel to assure timely exchange and coordination of information. County emergency management representatives participate in the JIC and exchange and coordinate information through video, teleconferencing and web link. Representatives coordinate information prior to distributing news releases and prior to news briefings. Press releases are reviewed by appropriate law enforcement agencies during hostile action events.

Indian Point Energy Center Emergency Plan

- c. Call Centers respond to public inquiries. Entergy, NYS, and each county respond to news media calls. It also monitors media reports through Internet websites. Rumors or misinformation are identified during an emergency by phone and media monitoring teams. Reports of misinformation or rumors are forwarded to the JIC staff for appropriate response.

5. Media Orientation

Entergy in cooperation with NYS, will annually acquaint news media personnel with the emergency plans, information concerning radiation and points of contact for release of public information in an emergency.

NYS typically issues a media advisory annually informing the media of Licensee, State, and County Websites that provide information on Emergency Planning, Radiation, and Indian Point Energy Center.

Part 2: PLANNING STANDARDS AND CRITERIA

Section H: Emergency Facilities and Equipment

This section describes the emergency facilities and equipment used by the Indian Point Emergency Response Organizations. It outlines the facilities and equipment requirements that aid in the timely and accurate response by the Indian Point Emergency Response Organizations. It also describes the surveillance programs used to monitor and insure that these facilities and equipment are maintained in a high degree of constant readiness.

The emergency response activities of the Plan are distributed among the functions of the following Emergency Response Facilities (ERF):

- Control Rooms (Unit 2 & Unit 3)
- Technical Support Center (joint facility)
- Operations Support Center (joint facility)
- Emergency Operations Facility (joint facility)
- Alternate Emergency Operating Facility (joint facility)
- Joint Information Center (joint facility)
- Alternative Technical Support Center / Operations Support Center (joint facility)

Each facility has procedures, staff, accommodations, equipment, services and supplies for implementing its function.

1. In-Plant Emergency Response Facilities

Control Rooms (CR)

Each unit's control room contains the necessary instrumentation for operating the plant under normal and accident conditions. Control Room personnel make the initial declaration and classification of an emergency and perform activities of other Emergency Response Facilities until those facilities are operational. Manipulations of the reactor or the plant to mitigate the consequences of an accident and restore safe conditions, however, remain as the primary function of the CR.

Once the entire Emergency Response Organization is operational additional positions are assigned to the CR. These individuals assure plant parameter data is available to the TSC/OSC and provide other emergency communications as necessary.

Overall management of the emergency response lies with the Shift Manager in the CR until it is accepted by either another qualified Emergency Director in the CR, (Plant Operations Manager) or the Emergency Director located in the EOF. Meteorological, plant parameter, offsite radiation monitor, and survey data are available for accident assessment, emergency classification and protective action recommendations. Telephone and radio services are available to alert and notify government authorities of emergencies and recommend protective action.

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Technical Support Center (TSC)

The Indian Point Energy Center TSC is in the Unit 1 Superheater Building, 53' elevation across the hall from the Unit 2 CR.

In the event that the TSC becomes uninhabitable, Emergency Planning Implementing Procedures provide details on how to relocate TSC personnel.

The primary functions of the TSC include providing:

- Plant management and technical support to the reactor operating personnel in the Control Room (CR) and
- Information on plant events and conditions, including plant parameter data, to the Emergency Director in the EOF.

The TSC is operational with minimum staff within 60 minutes after a declaration of an Alert, SAE, or GE. Activation of the ERO at an NUE is discretionary. In declaring the facility operational the manager should consider that the staff is appropriate to the need, that equipment is set up and that the facility is available to assume/perform the emergency functions assigned to the TSC.

The TSC Manager directs and coordinates activities in the TSC. Plant parameter data is available for accident assessment including core damage assessment. This data can be forwarded to the EOF or AEOF. Telephone service between locations on and off the site is also available.

Included in the TSC are the Computer Room, and NRC Conference/workspace. The Ventilation System assures that the General Design Center Criterion 19 (GDC) exposure limits of 5 Rem whole body and 30 Rem thyroid, during the first 30 days of a Design Basis Accident (DBA) can be met.

Operations Support Center (OSC):

The Indian Point Energy Center, OSC is located in the Unit 1 Superheater Building, 53' elevation adjacent to the TSC.

The OSC is where survey, operations and repair teams are dispatched into areas of the plant and is the staging area for individuals who may be assigned to first aid, search, rescue, survey, repair and corrective action teams.

The OSC Manager is responsible for managing the activities in the OSC including:

- Ongoing accountability of anyone dispatched from the OSC. The Control Room Supervisor or the Security Shift Supervisor tracks individuals who are assigned to the Control Room Watch or the Security Force respectively;
- Radiological exposure control for the individuals within the OSC and TSC and teams dispatched to the field.
- Mobilizing of individuals on the emergency roster needed to fill the positions in the OSC and other support personnel such as materials and warehouse personnel.

Indian Point Energy Center Emergency Plan

The OSC is operational with minimum staff within 60 minutes after a declaration of an Alert, SAE or GE. Activation of the ERO at an NUE is discretionary. In declaring the facility operational the manager should consider that the staff is appropriate to the need, that the equipment is set up and that the facility is available to assume/perform the emergency functions assigned to the OSC.

Equipment and supplies for the OSC include protective clothing, dosimetry, sampling and survey equipment to be used by the OSC teams.

Tools and parts available on site for normal plant maintenance are also available for damage control operations during emergencies.

Radiological exposure controls for the OSC include monitoring conditions and relocation if necessary.

In the event the OSC becomes uninhabitable, Plan Implementing Procedures provide details on how to relocate OSC personnel.

2. Emergency Operations Facilities:

The EOF is located at the Indian Point Energy Center, just inside the Main Facility Gate on Broadway. Functions performed at the EOF include:

- Overall management of the Indian Point Energy Center emergency response;
- Accident assessment including environment samples, surveys and dose calculations;
- Alert and notification of Federal, State and local government authorities of plant events, conditions, emergency action levels, emergency classifications and dose projections;
- Protective action recommendations to State and Local government authorities for the population around the EPZ;
- Coordination with Federal, New York State and local government;
- Radiological exposure control for the individuals on-site outside of the PA.

The EOF is activated with minimum staff within 60 minutes after a declaration of an Alert, SAE or GE. Activation of the ERO at a NUE is discretionary. In declaring the facility activated the manager should consider that the staff is appropriate to the need, that the equipment is set up and that the facility is available to assume/perform the emergency functions assigned to the EOF. Accommodations are available for Federal, State and local government representatives.

The Emergency Director in the EOF is responsible for the overall management of the response. Meteorological, plant parameter, offsite radiation monitor, environmental sample and survey data are available for accident assessment, emergency classification and protective action recommendations. Telephone and radio services are available to alert and notify government authorities of emergencies and recommend protective action.

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There are two levels in the EOF facility. The Emergency Control Center (ECC), Dose Assessment Area, NRC Room, Electrical Equipment Room and Communications Equipment Room are on the lower level and the State, County and Administrative Support areas are on the upper level.

Alternate Emergency Operating Facilities (AEOF)

There is an alternate location for the EOF outside the plume exposure Emergency Planning Zone (EPZ). AEOF and EOF functions are similar.

The Alternate Emergency Operations Facility is located on the 12th floor of the AT&T building at 440 Hamilton Avenue, White Plains, NY. Procedures, staff, accommodations, equipment, services and supplies for the AEOF are similar to those for the EOF including the capability to perform offsite notifications.

Entergy Regional Offices

Entergy provides support from the Corporate Headquarters and other Entergy sites. This office provides a common point of communication and coordination for the Emergency Director and the Indian Point Emergency Response Organization with the resources available through other corporate organizations.

3. Joint Information Center (JIC)

The JIC is located outside the plume exposure emergency planning zone at the Hudson Valley Transportation Management Center, 200 Bradhurst Avenue, Hawthorne, NY and provides a place for;

- Point of contact between the Entergy corporate spokesperson and the news media; and
- Coordination of public information released to the news media and the public by Entergy, State and Local government including alerts, notifications and protective action recommendations.

The JIC has accommodations for Federal, State and Local government representatives as well as representatives of the news media.

The JIC Manager manages Entergy activities at the JIC. The JIC has equipment to support the activities including video conferencing, telephones, facsimile and photocopiers. The JIC will be operational with minimum staff within 2 hours after a declaration of an Alert, SAE or GE. In declaring the facility operational the manager should consider that the staff is appropriate to the need, that equipment is set up and that the facility is available to assume/perform the emergency functions assigned to the JIC.

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4. Alternative TSC/OSC

The Alternative TSC/OSC has communication capabilities for contacting the Control Room, plant security, and the EOF, is available to serve as a staging area for augmented emergency response staff if the site is under threat of or experiencing hostile action. The Alternative TSC/OSC also has the capability for engineering assessment activities.

5. Offsite Emergency Operations Centers (EOC)

State and Local Agencies have established Emergency Operations Centers to direct their emergency response. The offsite EOCs are located as follows:

Orange County	Orange County Emergency Services Center, Goshen, NY
Putnam County	Putnam County Bureau of Emergency Services, Carmel, NY
Rockland County	Fire Training Center, Pomona, NY
Westchester County	Transportation Management Center, Hawthorne, NY
NY State	Public Safety Building State Campus Building #22, Albany, NY

6. Activation and Staffing of Emergency Response Facilities

Entergy has in place plans and procedures to ensure the timely activation of its emergency response facilities. Facilities are activated then declared operational when facility managers determine they can perform required functions based on minimum staff and emergency conditions. The full staffing of the emergency facilities is described in Section B of this plan. Timely mobilization and activation of the ERO is described in Section E.1.

If the site is under threat of or experiencing hostile action that would prevent emergency responders from reaching the site, EOF Staff would be sent to activate the Alternate EOF. TSC, OSC and CR Staffs will be notified to report to a designated alternate facility. TSC/OSC/CR staffs will provide any possible assistance from this offsite staging area until such time as site access is restored.

7. Emergency Onsite Monitoring Systems

In addition to the extensive normal plant systems which continually monitor plant systems, the following systems are used for emergency assessment:

a. Seismic Monitoring Equipment

The seismic monitoring equipment at the Indian Point Energy Center Site is located in the Unit 3 Containment Building. The Unit 3 Control Room Operator transmits information from this equipment to the Unit 2 Control Room. The monitoring system consists of three peak shock recorders in a tri-axial mount at EL-46'-0" on the base mat; two tri-axial strong motion accelerographs, one at EL-46'-0" on the base mat and one on the Containment Structure Wall at EL-100'-0" directly above the lower

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unit and three peak recording accelerographs, one each on a steam generator, a reactor coolant pump and the pressurizer.

The peak shock recorders readout in the Unit 3 Control Room on a peak shock annunciator when acceleration limits are exceeded. Both strong motion accelerographs record on digital tape recorders also located in the Control Room. The accelerographs on the base mat are wired to an alarm panel in the Unit 3 Control Room which produces an audible and a visual signal at an earthquake acceleration greater than 0.01g. If necessary, the magnetic clips from the peak recording accelerographs must be retrieved from inside containment to be further evaluated.

b. Radiological Monitors

A Radiological Monitoring System, consisting of fixed process (air, liquid or gas) monitors and area radiation monitors, are installed throughout each Unit with remote readouts and alarm indications in the Control Rooms. Key fixed radiation-monitoring equipment is identified in the U2 and U3 FSAR's.

In-plant Iodine Instrumentation

Measurement and analysis of airborne iodine concentrations within the station can be performed onsite using equipment located in areas expected to have post accident accessibility. Portable equipment to collect local samples is also available onsite. Procedures provide direction and guidance for sample collection and analysis.

Post-accident Sampling

Plant design includes the capability to sample the reactor coolant system, the discharge of the recirculation and residual heat removal pumps, and the post accident containment atmosphere.

Facilities for the radiation protection and chemistry groups include laboratory and calibration rooms for both conventional and radio chemical analyses.

Portable Survey Instruments

Counting equipment and supplies are available in emergency lockers. Administrative procedures describe type, locations and the amount of equipment available to the Emergency Response Organization.

c. Process Instrumentation

Vital parameters (e.g. pressure, flow, temperature, fluid level) are monitored and abnormal conditions immediately brought to the attention of the watch force with either local indication or remote indication in the Control Rooms.

Process instrumentation inside containment provides required operating and assessment information after a loss of coolant accident or a steam-line break. This instrumentation includes:

- Pressurizer pressure channels
- Pressurizer level channels

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- High-head flow channels
 - Accumulator pressure channels
 - Recirculation spray flow channels
 - Recirculation sump level channels
 - Containment sump level channels
 - Residual heat loop flow channels
- d. Instrumentation for Detecting Inadequate Core Cooling
- Instrumentation for detecting inadequate core cooling includes:
- Reactor coolant saturation meter
 - Hot leg wide range temperature
 - Cold leg wide range temperature
 - Wide range reactor coolant pressure
 - Pressurizer level
 - Reactor vessel level indication system (RVLIS)
 - Core exit thermal couples

The first indication of mass loss from the Reactor Coolant System (RCS) may be a decreasing pressurizer level. Saturation or the degree of subcooling can be determined from the saturation meter or with primary system pressure and temperature from the steam table in the Control Room. Cold and/or hot leg wide range temperatures that are higher than the saturation temperature indicate degradation of core cooling.

e. Fire Detection

Heat and smoke detectors are located throughout the plant with alarms annunciated in the Control Rooms. A detailed description of the fire detection equipment is in the Fire Protection Program documents.

8. Offsite Emergency Data Acquisition

a. Alternate sources for geophysical data

If meteorological data is unavailable from the station's tower, information can be obtained from the following sources:

- Several internet sites provide meteorological data and may be accessed from Emergency Response Facilities
- National Weather Service (NWS) hourly data from area reporting stations including wind speed, wind direction, cloud cover, precipitation, temperature, dew point and atmospheric pressure.

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- Atlantic City, New Jersey and Albany, New York NWS stations. These sources can also be used for flood and drought conditions for the Hudson River.
- b. Consultants are available to the Indian Point Energy Center staff regarding seismic monitoring of the Indian Point Energy Center vicinity.
- c. Backup radiological monitoring equipment and assistance can be obtained from other utilities through INPO or the Department of Energy's Brookhaven Area Office. Letters of agreement for these services can be found in Appendix 2 of this plan.
- d. Environmental sample preparation and counting are available through the use of an offsite laboratory. The offsite laboratory contract is available through the Indian Point Energy Center contracts department.

9. Facilities and Equipment for Offsite Monitoring

a. Survey Vehicles

Indian Point Energy Center has survey vehicles, equipped with two-way radios, GPS units and cell phones. Offsite Monitoring Kits used in these vehicles include air samplers, sample counters, portable survey meters (including low-level radioiodine detection equipment with a minimum sensitivity of 1×10^{-7} $\mu\text{Ci/cc}$), and personnel dosimeters are available for offsite monitoring. A more detailed list of equipment is available in the Plan Implementing Procedures.

During an emergency, the survey vehicles are sent to pre-selected locations within the EPZ. Laboratory facilities for personnel whole body counting and for environmental sample preparation and counting exist at the site.

b. Radiological Environmental Monitoring Program

Indian Point Radiological Environmental Monitoring Program includes routine direct gamma measurements, particulate and radioiodine air sampling, water sampling, and seasonal aquatic and land vegetation sampling at various locations. The Indian Point Radiological Environmental Monitoring Program is described in each unit's Offsite Dose Calculation Manual (ODCM).

Backup facilities for the environmental sample preparation and counting are available by a contract with an offsite laboratory.

c. Fixed Field Measurement Sites

Pressurized ionization chambers, one in each of the 16 sectors are located at various distances between the site boundary and 2 miles. The radiation data is collected by a computer system at the Indian Point Energy Center that allows access to this information through the Meteorological, Radiological and Plant Data Acquisition System (MRPDAS). The information from these systems is available at all IPEC facilities through the Entergy computer network. This information is also

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available to offsite Emergency Operation Centers via MRPDAS through a secure internet portal to the Entergy computer network. This data may be used to estimate whole body exposure offsite.

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10. Meteorological Monitoring

The meteorological system at the Indian Point Energy Center provides real-time meteorological parameters as specified in Enclosure 1 to Appendix 2 of NUREG-0654 (January 1980) and USNRC Regulatory Guide 1.23 Revision 1. The three basic functions outlined in Annex 1 to Appendix 2 of NUREG-0654-Rev. 1 have been implemented.

The meteorological system at Indian Point Energy Center consists of three meteorological towers. The 122 meter primary meteorological tower has instrumentation consisting of wind speed, wind direction and temperature at multiple levels. The vertical temperature gradient is then used to determine atmospheric stability. A backup diesel generator equipped with an automatic power transfer switch is available in the event that the normal AC feed is lost.

Backup towers are also available onsite. These towers provide a single 10-meter elevation for wind speed and wind direction instrumentation only. Determination of atmospheric stability is determined from the standard deviation of the horizontal wind fluctuation (σ - θ) over a 15-minute period.

Real-time wind speed and wind direction data are continuously monitored and recorded as 15-minute averages, with the data available through the Entergy computer network (MRPDAS). All of the data outputs are in the format specified in Enclosure 1 and Appendix 2 of NUREG-0654 (January 1980). Real-time meteorological information can also be obtained from the National Weather Service stations and other offsite meteorological facilities identified in Section H.7.

Real-time atmospheric transport and diffusion calculations are made using a computer system and peripherals.

11. Facility and Equipment Readiness

Emergency facilities and equipment are inspected and inventoried in accordance with departmental administrative procedures. The inspection includes an operational check of instruments and equipment. Equipment, supplies and parts that have a shelf life are identified, checked and replaced as necessary. Sufficient reserves of instruments/equipment are maintained to replace those that are removed from emergency kits or lockers for calibration or repair.

Survey instruments and counters have been placed on a rotating calibration schedule. Other equipment requiring calibration will be calibrated as recommended by the manufacturer. Normally, equipment-requiring calibration will be calibrated at the Station and will be immediately available in the event of an emergency.

Dedicated communications equipment between Federal, State and local government agencies within the plume exposure pathway EPZ are checked periodically in accordance with Section N.2.

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The results of tests, inventories, and inspections are submitted to the Emergency Planning Manager or designee for review. The Emergency Planning Manager or a designee is responsible for the evaluation of these results and assignment of corrective actions for deficiencies identified, if any.

Emergency Preparedness staffs will be informed of select system inoperability determinations resulting from any tests, inventories or inspections conducted on the systems, as the availability of these systems can have significant impact on the Emergency Plan.

12. Identification of Emergency Equipment and Supplies

Table H.1, Typical Emergency Equipment lists equipment that is typically provided for emergency response. Emergency Preparedness administrative procedures provide for details of specific type, location, content and are used to inventory emergency supplies.

13. Collection and Analysis of Field Monitoring Data

The Indian Point Energy Center is equipped to collect Offsite Monitoring data and samples. Sampling and analysis equipment is available to determine the activity of samples taken outside the Protected Area. Instrumentation and equipment utilized for sample activity determination is routinely calibrated to ensure timely availability. Emergency response personnel are in place to analyze samples and data to make decisions on protective action recommendations. Samples can be packaged and shipped to offsite laboratories for further analysis.

Table H-1: Typical Emergency Equipment

Emergency equipment and supplies are stored at various locations throughout the site for immediate use by emergency forces. The following is a listing of the types of equipment and supplies stored at various locations.

- | | |
|------------------------------------|--|
| Protective Equipment: | - Anti-C Clothing |
| | - Respirators |
| | - Self-Contained Breathing Apparatus |
| | - Potassium Iodide (KI) |
| | - Breathing Air Stations |
| Radiological Monitoring Equipment: | - Air Samplers |
| | - Ionization Chamber Survey Instruments |
| | - G-M Friskers |
| | - Iodine Counters |
| | - Dosimetry |
| | - Maps and Overlays |
| Communication Equipment: | - Telephones and outside lines |
| | - Various dedicated lines specific for the purpose of warning: RECS, ENS/HPN, Plant Alarms and Public Address System |
| | - Various direct lines |
| | - Radios (IPEC onsite, offsite channels, and Local Government) |
| | - Fax machines |
| | - Log Books/EP-Forms |
| Emergency Supplies: | - First Aid Kits |
| | - Stretchers / Blankets |
| | - Resuscitators |
| | - Backboards / Splints |
| | - Cervical collars |

Part 2: PLANNING STANDARDS AND CRITERIA

Section I: Accident Assessment

To effectively coordinate and direct all facets of the response to an emergency situation at Indian Point Energy Center, diligent accident assessment efforts are required throughout the emergency. All four emergency classifications have similar assessment methods, however, each classification requires a greater magnitude of assessment effort dependent upon the plant symptoms and/or initiating event(s).

In the case of a Notification of Unusual Event, the assessment and coordination of efforts are handled through the Control Room, with additional support as identified by the Shift Manager. During Alert, Site Area and General Emergencies the Technical Support Center, Operations Support Center, Joint Information Center, and the Emergency Operations Facility are activated. Technical Support Center personnel assist the watch personnel in the assessment of the accident and recommend appropriate steps to mitigate the accident. The Operations Support Center assists with in field inspections of plant equipment. The Emergency Operations Facility personnel continue the evaluation of offsite consequences started by the Shift Manager. The Joint Information Center provides interface with the public. The Emergency Operations Facility, when activated, maintains contact with the Control Room and contact with the offsite agencies, and then provides an overview of the assessment actions taken at various classifications levels as follows:

Notification of Unusual Event

The existence of conditions which would be classified under this heading is brought to the attention of Control Room Operators by (a) meteorological reports, (b) indications and alarms in the Control Room monitoring plant parameters, (c) indications from fire, seismic or security detection systems, or (d) observations by plant personnel.

Depending upon the particular circumstances of the event, the Shift Manager takes one or more of the following actions to assess the severity of the situation: request clarification and periodic update of meteorological information received from offsite source; monitor Control Room indications more closely; request the plant security force to investigate the matter further and report their findings; dispatch member(s) of the watch force to personally inspect areas of the plant; request assistance from the plant operations staff and/or Entergy's Engineering Departments in evaluating data; and make personnel observations (e.g. assessing the intensity and extent of fire). With regard to accidental releases of radioactivity within plant buildings, the Shift Manager would evaluate the alarm received with respect to other radiation monitors and process instrumentation readouts in the Control Room. Radiation Protection personnel could be sent into the affected plant area to make observations and evaluate radiation levels.

Indian Point Energy Center Emergency Plan

Alert

For emergency situations that are classified as Alerts, the Shift Manager/Emergency Director evaluates information available in the Control Room regarding radiation monitor readings, nuclear and process instrumentation readings, containment integrity and status of safeguards equipment.

The Shift Manager or Plant Operations Manager, acting as the Emergency Director at the start of the emergency, and the on call Emergency Director after taking over control at the Emergency Operations Facility, will continually direct assessment of the relative condition of the three fission product barriers and radiological conditions onsite and offsite.

During Alerts with radiological concerns, radiological assessment actions are initiated as described under the Site Area Emergency and General Emergency part of this section.

Site Area Emergency and General Emergency

For emergency situations that are classified as Site Area Emergencies or General Emergencies, the Shift Manager/Emergency Director evaluates information available in the Control Room regarding radiation monitor readings, nuclear and process instrumentation readings, containment integrity and the status of safeguards equipment.

An immediate assessment of the projected exposure to the offsite populace is made by using Dose Assessment Computer Programs or by using a Plan Implementing Procedure which includes determining a source term, release rate, radioactive airborne concentrations in the environment and projected exposure to the whole body and thyroid of individuals exposed to the plume. The specifics of these are as follows:

The source term is determined from the R-25 and R-26 accident monitor instruments, indicating radioactivity in the containment building released from the reactor core.

- The release rate is determined from the Plant Vent Monitor, Air Ejector Monitor or the Main Steam Line Monitors. Should the plant vent monitors read off-scale or be inoperable, contact field measurements are taken on the plant vent and a procedure is available to convert the mR/hr reading to an equivalent radioactive concentration for noble gases and radioiodine.
- The radioactive airborne concentrations in the environment are determined first by calculation and then by actual measurement. The calculations are done by computer or by hand, utilizing the Plan Implementing Procedures.
 - The calculation is performed using an equation that utilizes the release rate, dilution factor and wind speed. The dilution factor is obtained from a table in the computer code or implementation procedure corresponding to the current meteorological data.
 - Measurements are made by offsite monitoring teams who go to selected points and perform field surveys and air sampling. The air samples are counted and the activity calculated.

Indian Point Energy Center Emergency Plan

- The projected thyroid exposures are obtained from calculations that convert radioactive concentrations to mRem/hour and measurements taken in the field. Whole body exposures are as indicated by the field surveys.

This assessment is updated based on air sampling and field surveys performed by offsite monitoring teams using radio and cell phone equipped vehicles under the direction of the Emergency Director. The area within a 10-mile EPZ is divided into 16 equal 22½° sectors. In each sector, Dosimetry of Legal Record (DLR) has been installed at strategic locations.

A number of strategically located continuous air sampling sites may also be used to evaluate the exposure for the population at large.

The Emergency Director transmits updated assessment information to the New York State Office of Emergency Management and to the Westchester, Rockland, Putnam, and Orange County Emergency Management Offices.

Radioactive contamination assessment is performed after a release is terminated. The ongoing Indian Point Radiological Environmental Monitoring Program described in the ODCM is utilized to determine the extent of contamination.

Radiological assessment personnel in accordance with a Plan Implementing Procedure calculate total population dose. This calculation and others utilize established demographic information in combination with the DLR, bioassays, and projected dose distributions to obtain total population exposure within the ten-mile EPZ.

1. Plant Parameters and Corresponding Emergency Classification

- a. Plant system and effluent parameter values are utilized in the determination of accident severity and subsequent emergency classification. Environmental and meteorological events are also determining factors in emergency classification.
- b. An emergency condition can be the result of just one parameter or condition change, or the combination of several. The specific symptoms, parameter values or events for each level of emergency classification are detailed in the Indian Point Emergency Plan Implementing Procedures.
- c. In order to adequately assess the emergency condition, each emergency facility has the necessary equipment and instrumentation installed to make available essential plant information on a continuous basis. The types of instrumentation and equipment capabilities available for each emergency facility are described in Section H of the Plan.

2. Onsite Accident Assessment Capabilities

In addition to normal plant monitoring systems and procedures, the following systems are provided for accident assessment:

a. Sampling System

Plant design includes the capability to sample the reactor coolant system, the discharge of the recirculation and residual heat removal pumps, and the containment atmosphere.

Facilities for the radiation protection and chemistry groups include laboratory and calibration rooms for both conventional and radio chemical analyses.

b. Area Radiation & Process Radiation Monitors

Indian Point Energy Center has Area Radiation Monitors (ARM) for the direct measurement of inplant exposure rates and Process Radiation Monitors (PRM) for the measurement of noble gas and radioactive iodine concentrations in plant effluents. The ARM readings allow inplant exposure rate determinations to be made remotely without requiring local hand-held meter surveys. This information may be used, initially, to aid in the determination of plant area accessibility. The Process Radiation Monitors provide an immediate indication of a radiological release of effluents. The Process Radiation Monitor readings can be used as an input into the dose assessment programs (computer programs) that display the projected whole body and child thyroid exposures to the populace in the plume exposure pathway.

c. Containment Radiation Monitors and Hydrogen Monitor

Containment Radiation Monitors and/or Hydrogen Monitors along with Core Exit Thermocouples may provide an early indication of core damage. These monitor readings are utilized as a method for core damage determination. This is accomplished through use of established procedures based on Westinghouse Owners Group guidance. The core damage estimate obtained from the procedures may also be used to confirm the core damage results obtained through isotopic analysis. These monitors also allow for the evaluation of a potential radiological release.

3. Release Source Term Determination

a. The potential for release of radioactive material and the magnitude of the release can be assessed through use of the Containment Radiation Monitors and Process Monitors. The Containment Monitoring System readings can be used to estimate the percentage of core damage and establish the total number of curies available for release.

b. If a liquid or gaseous release occurs, the routine or high range process monitors will indicate the release rate. If the release is from an unmonitored point, technicians will take grab samples to be analyzed.

Radiation monitors are located as described in the U2 & U3 FSARs. The readings obtained from these monitors are converted to actual release rates through the use of computer programs.

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4. Effluent Monitor Data and Dose Assessment:

The correlation between effluent monitor data and onsite and offsite exposure rates is accomplished through use of the dose assessment computer codes. These programs allow for the direct input of effluent monitor and meteorological data. The computer will generate release rates, projected dose rates and doses to the whole body and thyroid as well as downwind noble gas and particulate concentrations via the plume exposure pathway. The computer software also has the capability of performing multiple accident dose assessment involving simultaneous releases from one or both of the Indian Point Energy Center units. Dose projections may also be performed without the use of a computer through a series of hand calculations. Indian Point Energy Center uses ground releases to conduct dose assessment.

Entergy has procured and installed computer based systems, which are capable of:

- a. Calculating the dispersion path of radioactive material if released to the atmosphere by the plant;
- b. Obtaining meteorological information from a primary and backup meteorological tower, thus providing assurance that basic meteorological information is available during and immediately following on accidental airborne radioactivity release;
- c. Calculating the radiological consequences of accidental radioactive releases to the atmosphere;
- d. Providing simultaneous real-time meteorological data for estimation of transport and diffusion estimates of a release in the vicinity of the site. This information is available to the licensee, offsite emergency response organizations and the NRC Staff, via telephone computer access;
- e. Obtaining additional radiological and meteorological inputs that assist in defining the site generated dispersion path calculations.

5. Meteorological Information:

Meteorological data are available from the station meteorological tower. The data available includes wind speed, wind direction, stability class (Pasquill). These data are utilized by the utility, Counties, State and NRC to provide near real-time predictions of the atmospheric effluent transport and diffusion. Section H.9 provides more details on the Meteorological Monitoring System.

6. Unmonitored Release:

If during an actual release, via an unmonitored flow path or in situations in which effluent monitors are either off scale or inoperative, dose projections can be made through use of actual sample data and/or field monitor team readings.

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7. Offsite Monitoring:

In the event of an airborne or liquid release, the station maintains the resources and capabilities to take air, soil, water, and vegetation samples as well as to directly measure gamma dose rates. Samples are taken at locations specified by the Radiological Assessment Coordinator. Environmental measurements are utilized as an aid in the determination of protective and recovery actions for the general public.

A Reuter Stokes Radiation Monitoring System consisting of a network of monitors is installed in each of the 16 standard meteorological sectors around the Indian Point Energy Center Site at a distance of 0.5 to 2.5 miles. These devices will continuously telemeter, via radio, radiation level readings to a computer system, which can be accessed in the EOF, AEOF, IPEC Central Control Rooms and County and State EOCs.

Dosimetry of Legal Record (DLR) - DLR's are deployed in three (3) rings at approximately 2, 5 and 10 miles from the site. DLR's are sensitive to Gamma radiation and are gathered and read periodically. There are approximately 57 DLR's distributed within the 10 mile Emergency Planning Zone for Indian Point Energy Center.

Air Samplers are deployed at a number of the sampling sites. They are constantly in operation and pass ambient air through a series of filters that are capable of trapping radioactive iodine and other radioisotopes in the air. The filters are periodically removed and analyzed by Entergy personnel.

8. Offsite Monitoring Teams:

Offsite Monitoring Teams are available at an Alert or higher classification to make rapid assessments of the actual or potential magnitude and location of any radiological hazards from the liquid or gaseous release pathways. These teams are composed of two individuals qualified to perform radiological monitoring.

Monitoring teams establish and maintain direct radio or phone communications with the Emergency Operations Facility (EOF). An Offsite Team Coordinator in the EOF controls the teams. The teams locate and monitor the radioactive plume while taking air samples as directed.

Offsite teams utilize portable equipment during an emergency to gather data from any of the sixty-one predesignated emergency sampling locations around the Indian Point Energy Center Site. Large-scale maps showing the locations are in the Control Room and Emergency Operations Facility (EOF) or AEOF, for use by the Emergency Director. Readings taken by these teams are relayed back to the site via radio, using commercial telephones as back up.

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Monitoring Team Kits containing necessities including the following radiological equipment are maintained in a ready state and would be utilized by the teams:

- a. Radiation field survey instruments used to perform beta and gamma radiation field surveys.
- b. Air Sampler which is basically a blower with a filter holder in the inlet, utilized to take samples of ambient air and pass the air through a fiberglass and an activated charcoal or silver zeolite filter. The filters remove and absorb radioisotopes from the air.
- c. Sample counter that is a device used to measure the radioactivity of filters used in the air sampler.
- d. Equipment for personnel protection such as shoe covers and gloves for use in radiation environments.
- e. Support equipment and supplies.

Survey data from monitoring teams is used to define affected areas, verify or modify dose projections and protective action recommendations, and assess the extent and significance of a release.

9. Iodine Monitoring:

Offsite Monitoring Teams collect air samples while in the plume exposure pathway. The teams carry procedures and equipment for sampling and measuring radioiodine concentrations in air as low as $1.0E-7$ micro curies per cubic centimeter in the presence of noble gases.

10. Dose Estimates:

Specific procedures exist for the correlation of air activity levels to dose rate for key isotopes. Provisions have been established for estimating integrated dose from the projected and actual dose rates and for the comparison of these estimates with the protective action guides.

11. State Monitoring Capabilities:

The State of New York has the ability to dispatch its own offsite monitoring teams to conduct ingestion pathway monitoring. The state also has the ability and resources to coordinate with federal and utility monitoring teams to compare sample results.

Part 2: PLANNING STANDARDS AND CRITERIA

Section J: Protective Response

Protective response consists of emergency actions taken during or after an emergency situation, which are intended to minimize or eliminate hazards to the health and safety of the public and/or Station personnel. A range of protective actions has been developed for emergency workers and the general public in the plume exposure pathway Emergency Planning Zone (EPZ). Additionally, guidelines have been established to aid in choosing protective actions during an emergency that are consistent with federal guidance. Entergy is responsible for onsite protective actions, while the responsibility for offsite protective actions rests with the State of New York, local authorities and other offsite response agencies.

1. Notification of Onsite Personnel:

- a. For all emergency classifications, all station personnel, contractors, visitors and Owner Controlled Area (OCA) badged personnel are notified of an emergency by either the public address system, distinct audio signals (air raid alert, fire, site assembly or containment evacuation alarms) and/or alternate methods. Announcements include the emergency classification and response actions to be taken by site personnel.

The Public Address System(s) are designed for paging persons within the site Protected Area from the Control Rooms. Personnel have the ability to talk to the Control Rooms via party line phones that are strategically located within the units. Plant personnel may initiate the communication to the Control Room from outlying party lines.

- b. Visitors within the Protected Area are escorted at all times by badged personnel who will ensure that the visitor takes the proper actions for the event.
- c. Contract personnel who have un-escorted access to the Protected Area must complete Plant Access Training that includes instructions for actions to be taken during an emergency.
- d. Accountability of persons within the Site Boundary but outside the Protected Area is not required. However, the Security Force will ensure that individuals in the Owner Controlled Area (including individuals with OCA badges) are notified as necessary of any emergency and the response actions to be taken.

2. Evacuation Locations:

Assembly areas and evacuation routes are specified in the Emergency Planning Implementing Procedures. Depending on meteorological conditions, the Shift Manager/ Emergency Director decides whether to release plant personnel and the appropriate evacuation routes. Inclement weather, high traffic density and specific radiological conditions and other hazards are considered in making this decision. The release of personnel is under the direction of the Shift Manager/Emergency Director. Personnel are released to go home or continue from the site to assembly areas using their own cars when practical or other transportation provided by Indian Point Energy Center.

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3. Radiological Monitoring:

Radiological monitoring of personnel, their possessions and their automobiles would be performed by Radiation Protection or trained monitoring personnel using instrumentation that is normally available or specifically assigned for this purpose. Personnel may be evacuated/released as part of the general public to offsite relocation centers designated by offsite authorities.

4. Assembly & Evacuation:

Relocation outside the Protected Area and/or evacuation is the primary protective action anticipated for onsite personnel not having emergency response assignments. Non-essential personnel (personnel not assigned emergency response functions, contractors and visitors) are directed to assemble at pre-designated assembly areas at the Alert or higher classification. The primary assembly area is the Indian Point Energy Center Generation Support Building (GSB) and the Energy Education Center (EEC). The Indian Point Energy Center Training Center serves as the back-up assembly area and may be used during periods of high volume, such as an outage. Personnel assigned emergency response functions respond to their assigned emergency facilities.

Evacuation / release of non-essential Indian Point Energy Center personnel is initiated upon declaration of either a Site Area Emergency or General Emergency. The Emergency Director may release personnel at a lower classification.

5. Accountability:

At the declaration of an Alert, all personnel are relocated from within the Protected Area. At a Site Area Emergency or General Emergency all individuals within the Protected Area are accounted for and the names of missing individuals are identified within 30 minutes of sounding the Site Assembly Alarm. Once established, accountability within the Protected Area is maintained throughout the course of the event, unless conditions allow suspension in the later stages of the event. Should missing personnel be identified, search and rescue operations are initiated. Accountability is coordinated between the OSC Manager and Security. The results are forwarded to the Emergency Plant Manager and/or Emergency Director.

Accountability could be suspended if movement of personnel would place them in more danger than leaving them in place, such as outside weather conditions or security events.

Personnel who are assembled outside the protected area are given further instructions. These instructions may include sheltering in place, evacuation or, individuals may be requested to assist the ERO in accident mitigation.

If site evacuation is called for, Security will sweep all onsite areas outside the Protected Area and verify all personnel have evacuated or been released.

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6. Provisions for Onsite Personnel:

The station maintains an inventory of respiratory protection equipment, anti-contamination clothing, and a supply of KI that is made available to emergency workers remaining onsite should conditions warrant.

- a. Assembly areas and evacuation routes are described in the Implementing Procedures. Assembly areas are located to assure that personnel are not in the path of the plume. Each assembly area has a telephone. The assembly areas (GSB and IPEC Training Building) are within the range of the plant paging system.
- b. Self-contained breathing apparatus (SCBAs) and full-face respirators are used as the primary method of respiratory protection in an emergency. Emergency response personnel use SCBAs in any environment involving exposure to high-level gaseous activity or oxygen deficient atmosphere, or where air quality is in doubt. In the presence of airborne particulates, emergency response personnel may be directed by Radiation Protection personnel to use full-face filter type respirators.
- c. Anti-contamination clothing, located in the Operations Support Center (OSC) lockers, is available for use by onsite personnel entering areas of plant with known or unknown contamination.
- d. The use of thyroid-blocking Potassium Iodide (KI) may be recommended at 5 Rem CDE child thyroid or when a General Emergency condition initiates the recommendation to State and Counties to implement KI Program. This is a lower value than specified by EPA 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents". A supply of KI is maintained in the Emergency Response Facilities. Procedures are in place for the use of these agents by emergency response personnel. Administration of KI may be authorized only by the Emergency Director or by the Emergency Plant Manager.
- e. Precautions shall be taken to prevent the contamination of drinking water and food supplies by using bottled water and packaged foods.
- f. A range of protective actions to protect onsite personnel during hostile action is provided to ensure the continued ability to safely shut down the reactor and perform the functions of the emergency plan.

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7. Protective Action Recommendations for the General Public:

Plant conditions, projected whole body gamma and thyroid doses, and/or field monitoring data are evaluated to develop protective action recommendations for the purpose of preventing or minimizing exposure to the general public. Protective action recommendations for the plume exposure pathway are based on the Environmental Protection Agency (EPA) Protective Action Guides (PAGs) discussed in EPA-400-R-92-001 - "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" and NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, Guidance for Protective Action Strategies".

Protective action recommendations are made directly to the State and local agencies that are responsible for implementing protective actions for the general public within the plume exposure EPZ. The Emergency Director makes protective action recommendations.

Recommendations issued by Indian Point Energy Center at a General Emergency based on plant conditions include as a minimum, evacuation in the two (2) mile radius and five (5) miles downwind and advising the remainder of the EPZ population to monitor EAS messages for further direction. The Indian Point Energy Center's rationale and methodology for plant-based and dose-based protective action recommendations has been coordinated with local and state response organizations as required by NUREG-0654, Supplement 3.

8. Evacuation Time Estimates:

An independent evacuation time study has been performed to provide estimates, of the time required to evacuate commercial, resident and transient populations (see Appendix 5).

9. Protective Measure Implementation:

State and local agencies are responsible for implementing offsite protective actions. These actions are included in the State and County Emergency Plans. Entergy is responsible for recommending offsite protective actions to the offsite authorities.

10. Factors Affecting Protective Measure Implementation

The State, and County emergency plans used to implement the protective measures for the plume exposure pathway take numerous factors into consideration. Among these considerations are:

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- a. Most of the evacuating population will travel in their own vehicles, leaving the EPZ via designated evacuation routes. Maps showing the evacuation routes, evacuation Protective Action Areas, reception centers in host areas, and congregate care centers have been developed as part of the state and local plans. Pre-selected sampling and monitoring points have also been identified.
- b. The population distribution around Indian Point Energy Center is presented in the Evacuation Time Estimate.
- c. Section E of this Plan describes how offsite agencies are notified in the event the Plan is activated. State and local agencies have the capability to notify all members of the transient and resident population within the plume exposure EPZ.
- d. State and local organizations have the capability to protect those persons where mobility may be impaired due to such factors as institutional or other confinement. At the time of an emergency, transportation requirement of special needs persons (including mobility impaired) is verified. Mobility impaired will be notified of a protective action via the Emergency Alert System (EAS).
- e. An adequate supply of potassium iodide (KI) is available for distribution by state and local organizations to special facility staff and patients/residents where immediate evacuation would be life threatening. Authority for use of radioprotective drugs rests with the NY Health Department.
- f. State and local organization plans include the method by which decisions are made for administering radioprotective drugs to emergency workers. The distribution of radioprotective drugs to the general public has been authorized by the State. Each individual County's Emergency Plan addresses Pre and Post distribution of Radioprotective drugs.
- g. State and local organizations have the capability of providing a means of relocation for the general population. Most of the evacuating population will travel in their own vehicles, driving out of the EPZ using designated evacuation routes. Transportation dependent persons will be instructed through the Emergency Alert System (EAS) to go to a pickup point or bus route for transportation to a reception center.
- h. State and local organizations are capable of providing reception centers in host areas that are beyond the boundaries of the plume exposure pathway emergency-planning zone.
- i. Projected traffic capacities have been determined for evacuation routes under emergency conditions. Section 4 of the Evacuation Time Estimate provides discussion regarding capacity.
- j. Federal, State and local organizations have the responsibility for the control of access to evacuated areas. Personnel from New York State Police and local police departments' staff access control points. The New York Highway Department and local public works departments provide necessary equipment to support access control. The U. S. Coast guard would assist in patrolling the Hudson River areas.
- k. Potential impediments to the use of evacuation routes and contingency measures for such impediments have been identified in local emergency plans.

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- l. Time estimates for evacuation of various groupings of Protective Action Areas have been performed, under various conditions for the plume exposure pathway emergency-planning zone.
- m. The basis for dose driven protective action recommendations are as follows:
 - If projected doses exceed minimum EPA PAGs and timely evacuation is feasible, then evacuation is recommended. If timely evacuation is not feasible, (i.e. time required for mobilization, warning and evacuation transit is greater than time before plume arrival), then State authorities may direct sheltering in place.
 - Additionally, if the sheltering dose exceeds the PAG but is less than the projected evacuation dose, then sheltering is considered. A shielding factor of 0.9 is conservatively assumed in the calculation of the sheltering dose. This factor (from SANDIA 77-1725) represents the shielding afforded by a wood frame house. The decision to shelter is the responsibility of the offsite authorities.

11. Ingestion Pathway Protective Measures:

The responsibility for specifying protective measures to be used for the ingestion pathway rests with the States of New York, Pennsylvania, Connecticut and New Jersey. These measures include the methods for protecting the public from consumption of contaminated water and foodstuffs.

12. Monitoring of Evacuees:

The State and local organizations have the capability to register and monitor evacuees at reception centers at host communities. This capability includes personnel and equipment capable of monitoring residents and transients evacuating from the plume exposure EPZ and arriving at the reception centers, in accordance with FEMA guidelines.

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Section K: Radiological Exposure Control

This section of the Plan describes the means for controlling emergency worker radiological exposures during an emergency, as well as the measures that are used by Entergy to provide necessary assistance to persons injured or exposed to radiation and/or radioactive materials. Exposure guidelines in this section are consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides, EPA 400-R-92-001.

The general guideline for emergency personnel exposure will be to keep it as low as reasonably achievable.

1. Emergency Exposure Guidelines:

Radiation exposure in an emergency is controlled taking every reasonable effort to minimize exposure. However, circumstances may warrant exposure in excess of 10CFR20 limits. Saving a life, measures to circumvent substantial exposures to the general public, or the prevention of damage to critical equipment may be sufficient cause for above normal exposures. The following are the exposure guidelines for emergency activities:

Dose Limit (Rem TEDE)	Activity	Condition
0-5	All	Personnel may be kept within normal 10 CFR 20 occupational limits during declared emergencies or an emergency exposure up to 5 Rem may be authorized for members of the ERO.
5 - 10	Protecting valuable property	Lower dose not practicable. Must be authorized on individual bases.
10 - 25	Lifesaving or protection of large populations	Lower dose not practicable. Must be authorized on individual bases.
> 25	Lifesaving or protection of large populations	Only on a voluntary basis to persons fully aware of the risks involved. Must be authorized on individual bases.

Limit dose to the lens of the eye to 3 times the above values and doses to any other organ (including skin and body extremities) to 10 times the above limits.

Any emergency response action requiring greater exposure than 10CFR20 limits should be limited to only volunteers. Individuals over forty-five years of age are considered first. Females of childbearing age shall not be permitted to receive exposures in excess of 10CFR20 limits.

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2. Emergency Radiological Control Program:

The Radiological Assessment Coordinator (EOF) and the Rad/Chem Coordinator (OSC) ensure that proper personnel radiological monitoring equipment is provided for all personnel during emergency conditions, that exposure accountability is maintained, and that personnel are not allowed to enter known or potential high radiation areas unless their exposure has been properly evaluated. Plan Implementing Procedures detail the emergency radiological controls utilized during emergencies. Radiation protection guidelines during emergencies include the following:

- Persons undertaking any emergency operation in which the dose will exceed 25 Rem TEDE should do so only on a voluntary basis and with full awareness of the risks involved including the numerical levels of dose at which acute effects of radiation will be incurred and numerical estimates of the risk of delayed effects.
- In the context of the emergency limits, exposure of workers that is incurred for the protection of large populations may be considered justified for situations in which the collective dose avoided by the emergency operation is significantly larger than that incurred by the workers involved.
- Exposure accountability is maintained and proper personnel radiological monitoring equipment is provided for all personnel during emergency conditions.
- Access to high radiation areas is only permitted with prior approval of the applicable Radiation Assessment Coordinator (EOF) or Rad/Chem Coordinator (OSC), and personnel are not allowed to enter known or potential high radiation areas unless their exposure has been properly evaluated.
- Periodic habitability surveys of emergency facilities are performed during an emergency. If the facility is determined to be uninhabitable, the facility is evacuated in order to prevent or minimize exposure to radiation and radioactive materials. Alternate assembly areas are established, as necessary, to relocate and monitor evacuated personnel.

KI shall be used in accordance with New York State Policy for issuance of Potassium Iodide. If the risk of using KI outweighs the benefit, KI may not be issued. KI is stored in onsite Emergency Response Facilities.

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3. Personnel Monitoring

- a. If abnormal radiological conditions exist outside the Radiologically Control Area (RCA), exposure to emergency response personnel not issued Dosimetry of Legal Record (DLR) badges will be tracked by use of surveys and time spent in radiation areas.
- b. Workers who would be expected to enter the RCA are trained and issued DLR Badges. In addition to these badges, dosimetry devices will be issued, high range or electronic dosimeters and/or alarming self-indicating dosimetry, are used to monitor emergency workers exposure during an accident. The capability exists for the emergency processing of DLRs on a 24-hour per day basis, if necessary. Emergency workers are instructed to read self-indicating dosimeters frequently, and DLRs may be processed with increased periodicity.
- c. Emergency worker dose records are maintained in accordance with one or more Plan Implementing Procedures and Radiation Protection Procedures.

4. Non-Entry Personnel Exposure Authorization:

The responsibility for authorizing non-Entry emergency workers (i.e. State and local agency emergency workers) to receive exposures in excess of the EPA General Public Protective Action Guides rests with the State and local organization, except when such emergency workers are onsite. Authorization of exposures in excess of EPA General Public Protective Action Guides, in this latter instance, rests with the Emergency Director or the Emergency Plant Manager in conjunction with Incident Response Team Leaders (such as the Fire Department, Police or Medical teams sent to the site).

5. Decontamination and First Aid

- a. Normal contamination control limits apply in emergency conditions. However, these limits may be modified by Rad/Chem Coordinator or the Radiological Assessment Coordinator should conditions warrant.
- b. Decontamination materials and portable first-aid kits are stored within the Protected Area and at the EOF / Warehouse Complex. A personnel injury onsite involving possible radioactive contamination is initially treated by an on-shift first responder or EMT if available. Prompt attention is given to life endangering injuries such as extensive burns, serious wounds or fractures, in preference to decontamination. If the injury permits, all reasonable effort is made to decontaminate the individual prior to movement. If decontamination is impractical, the patient is covered in such a manner as to minimize the spread of contamination until medical aid can be obtained or the patient can be hospitalized.

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The Verplanck Fire Department ambulance is the primary provider of prompt transportation of persons requiring medical attention from the station to area hospitals. This service is available on a 24-hour per day basis. For accidents involving contamination, if a Radiation Protection Technician (RP) is available, then one will be assigned to accompany the patient to the hospital to assist and advise ambulance and hospital personnel.

Patients requiring Emergency Room care, laboratory work, X-rays or lifesaving procedures are transported to the Hudson Valley Hospital Center (primary), to Phelps Memorial Hospital Center (1st backup) or another equipped medical facility. Hospital personnel have been trained and hospitals are equipped to handle radiologically contaminated or radiation injured individuals. Medical personnel may recommend transportation to other medical facilities equipped for long term or intensive care for radiation injuries. Radiation Protection personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control.

6. Contamination Control Measures

- a. Areas in the plant found to be contaminated are isolated as restricted areas with appropriate radiological protection and access control as directed by the Rad/Chem Coordinator.
- b. In order to preclude the spread of contamination from restricted areas, all personnel and equipment are monitored for radioactive contamination prior to exiting the restricted areas. Contaminated personnel are decontaminated. Eating, drinking and smoking are prohibited in all Emergency Response facilities until such time as habitability surveys indicate that such activities are permissible.
- c. Restricted areas will be returned to normal use when contamination levels have been returned to acceptable levels.

7. Decontamination of Relocated Personnel:

Non-essential onsite personnel are released from the Protected Area during an emergency, if radiological concerns occur. Radiation Protection personnel and/or portal monitors are used to monitor evacuees and decontamination is performed, as needed. Existing and temporary facilities to limit contamination and exposure will be utilized and established at the site as necessary during an emergency situation. In the event that decontamination of onsite personnel locally is not possible, personnel will be sent to a county emergency worker monitoring and decontamination center for monitoring and decontamination. Provisions for extra clothing, as well as suitable decontaminates are available.

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Section L: Medical and Public Health Support

This section describes the Indian Point Energy Center's arrangements for medical services including contaminated injured individuals sent from the Station.

1. Hospital Services:

The Hudson Valley Hospital Center at Peekskill/Cortlandt has agreed to accept patients from the Indian Point Energy Center Site who have been injured, contaminated or irradiated. This is a modern hospital with facilities such as an emergency room, a laboratory, a radiology department and a nuclear medicine department. A written agreement is contained in Appendix 2.

The Phelps Memorial Hospital Center, Sleepy Hollow, New York has agreed to serve as the backup hospital. A written agreement is contained in Appendix 2.

Station procedures contain directions that cover the request for medical assistance and the handling of patients. In the event that a patient should receive a massive radiation exposure, an expert medical consultant specializing on the management of radiation injuries would be available. A written agreement is contained in Appendix 2.

2. Onsite First Aid Capability:

A First Aid Room in a non-radiation area is on el. 15 of the Unit 1 Administration Building. This room contains general first aid equipment, oxygen breathing apparatus and an examination table for non-contaminated patients.

First Aid and Decontamination facilities for both units are located just beyond the Radiation Protection Control Points. These facilities consist of a stainless steel interior with decontamination table, showers and sinks draining into a holdup tanks. These facilities contain general first aid equipment and medical supplies for treatment of injuries.

A medical Facility is located at the Indian Point Energy Center Training Center. General first aid equipment including bandages and dressings, splints, etc., is available as well as an examination area.

First Aid Kits are located in several locations throughout the station.

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3. Medical Service Facilities:

The State of New York maintains a list of public, private and military hospitals and other emergency medical facilities considered capable of providing medical support for any contaminated injured individuals. A medical consultant company which specializes in treatment of radiological related injuries is contracted to provide assistance if needed.

4. Medical Transportation:

Indian Point Energy Center has arranged with a local ambulance service for transporting victims of radiological accidents to medical support facilities.

Arrangements have been made for transporting injured, contaminated and irradiated personnel to the hospital via the Verplanck Fire Department ambulance that provides 24-hour services. Backup ambulance service is available through a mutual aid system. A written agreement is contained in Appendix 2. The Verplanck Fire Department Ambulance participates in annual medical emergency drills as described in Section N.

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Section M: Re-entry and Recovery Planning

This section describes the measures to be taken for re-entry into the areas of Indian Point Energy Center that have been evacuated as a result of an accident. It also outlines the Indian Point Recovery Organization and its concepts of operation.

1. Re-entry and Recovery:

Re-entry

During an emergency, immediate actions are directed toward limiting the consequences of the accident, so as to afford maximum protection to Station personnel and the general public. Once corrective measures have been taken and effective control of the plant has been re-established, a more methodical approach to re-entry is taken. This Emergency Plan therefore divides re-entry into two separate categories:

- Re-entry during the emergency phase of an accident is performed to save a life, control a release of radioactive material, prevent further damage to plant equipment or restore plant equipment. If necessary, this category of re-entry may be performed using emergency exposure limits. Briefings and emergency forms, rather than written radiation protection procedures, operating procedures and maintenance procedures can be used when making these entries.

The Shift Manager and/or the Control Room Supervisor direct re-entry activities prior to activation of the Emergency Facilities. Once the TSC/OSC has been activated, all re-entry activities conducted during the emergency are authorized by the Emergency Plant Manager (EPM) and coordinated through the Operations Support Center.

- Re-entry during the recovery phase is performed using normal exposure limits. Either normal procedures or procedures developed specifically for each re-entry are utilized.

The Site Recovery Director or the station's normal management organization oversees the re-entry. Generally, site problems are addressed first to make the site tenable for workers, with a series of radiation surveys to establish accessibility and then steps are taken restore the station to normal operations.

All data gathered from re-entry operations and additional information developed by the various technical support groups will be assessed.

The plan is to return plant conditions to within Technical Specification limits and it may include detailed schedules, specialized equipment and personnel, preparing procedures for decontamination, processing highly radioactive water, repairing equipment, and purchasing equipment. A station nuclear safety/review committee reviews and approves recovery operations in accordance with its charter and the Technical Specifications.

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Recovery:

Recovery is defined as those steps taken to return the plant to its pre-accident condition. Radiation exposure to personnel involved in the recovery will be kept at a minimum and within the stated limits of 10 CFR 20. Radiation areas will be roped off and posted with warning signs indicating radiation levels and permissible entry times based on survey results. Access to these areas will be controlled, and exposures to personnel entering such areas documented. Shielding will be employed to the fullest extent possible. Survey results, interviews of individuals with direct knowledge of recent conditions in the affected area(s) and all other pertinent information collected from logs and other records or indicators in the Control Room and in the Emergency Operations Facility may be used to evaluate the advisability and the timing of re-entry to affected areas.

The Emergency Director, after consulting with the EOF Manager, Company Spokesperson, the Emergency Plant Manager and the Plant Operations Manager, has the responsibility for determining when an emergency situation is stable and the station is ready to enter the recovery phase. Prior to terminating an emergency and entering the recovery phase, the following conditions are considered:

- Do conditions still meet an Emergency Action Level? If so, does it appear unlikely that conditions will deteriorate?
- Radioactive releases are under control and are no longer in excess of Technical Specification limits.
- The radioactive plume has dissipated and plume tracking is no longer required. The only environmental assessment activities in progress are those necessary to assess the extent of deposition resulting from passage of the plume.
- In-plant radiation levels are stable or decreasing, and acceptable, given the plant conditions.
- The potential for uncontrolled radioactive release is acceptably low.
- The reactor is in a stable shutdown condition and long-term core cooling is available and adequate. There is no foreseeable danger of losing heat removal capability
- Containment pressure is within Technical Specification limits.
- Any fire, flood, earthquake or similar emergency condition no longer exists.
- All required notifications have been made.
- Discussions have been held with Federal, State and local agencies and agreement has been reached to terminate the emergency.

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- At an Alert or higher classification (non-transitory classification), the Emergency Response Organization is in place and emergency facilities are activated.
- Any contaminated injured person has been treated and/or transported to a medical care facility.
- Offsite conditions do not unreasonably limit access of outside support to the station.

It is not necessary that all conditions listed above be met; however, all items must be considered prior to entering the recovery phase. For example, it is possible after severe accidents that some conditions remain which exceed an Emergency Action Level, but entry into the recovery phase is appropriate.

2. Recovery Organization

Once the decision is made to enter the recovery phase, the extent of the staffing required for the Indian Point Recovery Organization is determined.

- For events of a minor nature, (i.e. for UNUSUAL EVENT classifications) the normal on shift organization is normally adequate to perform necessary recovery actions.
- For events where damage to the plant has been significant, but no offsite releases have occurred and/or protective actions were not performed, (i.e. for ALERT classifications) the Indian Point Emergency Response Organization, or portions thereof, should be adequate to perform the recovery tasks prior to returning to the normal Station organization.
- For events involving major damage to systems required maintaining safe shutdown of the plant and offsite radioactive releases have occurred, (i.e. for SITE AREA EMERGENCY or GENERAL EMERGENCY classifications) the Indian Point and Corporate Emergency Center Manager is put in place.

The specific members of the Indian Point Recovery organization are selected based on the sequence of events that preceded the recovery activities as well as the requirements of the recovery phase. The basic framework of the Indian Point Recovery Organization is as follows:

- a. The Corporate Emergency Center Manager is responsible for:
 - Ensuring adequate corporate support to maintain Indian Point Energy Center (IPEC) units in a safe condition;
 - Ensuring Site Recovery Director is aware of Entergy Corporate goals and expectations for recovery of IPEC after an event;
 - Ensuring adequate support to the site to carry out recovery activities;

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- b. The Site Recovery Director is charged with the responsibility for directing the activities of the Indian Point Recovery organization. These responsibilities include:
- Ensuring an Event Summary Report is prepared and transmitted to offsite authorities;
 - Overseeing the development of and approving a Recovery Plan and any special recovery procedures. The Recovery Plan shall address both short term and long-term actions and provide guidance on when Recovery is to be terminated. A specific instruction for the development of a Recovery Plan is provided in an Implementing Procedure;
 - Deactivating any of the Indian Point Emergency Response Organization that was retained to aid in recovery, in the appropriate manner. Depending upon the type of accident and the onsite and offsite effects of the accident, portions of the Indian Point Emergency Response Organization may remain in place after initiation of the recovery phase;
 - Coordinating the integration of available Federal and State assistance into onsite recovery activities;
 - Coordinating the integration of Indian Point Energy Center support with Federal, State and local authorities into required offsite recovery activities;
 - Verifying and approving information released by the public information organization that pertains to the emergency or the recovery phase of the accident;
 - Maintaining a record/log of specific recovery actions taken.
 - Working with senior company management in providing for assistance to Entergy Employees affected by the event; and
 - Determining when the recovery phase is terminated. Recovery will be terminated when actions identified in the Recovery Plan have been completed.
- c. The Onsite Recovery Manager reports to the Site Recovery Director and is responsible for:
- Identifying and documenting issues relating to Recovery operations
 - Coordinating the development and implementation of the recovery plan and procedures;
 - Directing all onsite activities in support of the recovery of Indian Point Energy Center; and
 - Designating other Indian Point Energy Center recovery positions required in support of onsite recovery activities.
 - Developing of a Root Cause Report.

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The Plant Manager or a designated alternate will become the Onsite Recovery Manager.

- d. The Offsite Recovery Manager reports to the Site Recovery Director and is responsible for:
- Offsite activities during the Recovery phase include assisting State and local authorities to survey, map and decontaminate areas necessary to return the general public evacuated from around the site;
 - Providing liaison with offsite agencies and coordinating Indian Point Energy Center assistance for offsite recovery activities;
 - Coordinating Indian Point Energy Center ingestion exposure pathway EPZ sampling activities and the development of an offsite accident analysis report;
 - Developing a radiological release report; and
 - Designating other Indian Point Energy Center recovery positions required in support of offsite recovery activities.

A member of Emergency Planning Department Management or a designated alternate will serve as the Offsite Recovery Manager.

- e. The Company Spokesperson reports to the Site Recovery Director and is responsible for:
- Functioning as the official spokesperson to the press for Indian Point Energy Center on all matters relating to the accident or recovery;
 - Coordinating non-Indian Point Energy Center public information groups (Federal, State, local, etc.);
 - Coordinating media monitoring and rumor control; and
 - Determining what public information portions of the Indian Point Emergency Response Organization will remain activated.

A senior Indian Point Energy Center management individual or a member of the company's Public Information Group is designated as the Company Spokesperson.

- f. The Corporate Emergency Center Manager reports to the Site Recovery Director and is responsible for:
- Overseeing development of corporate recovery issues dealing with support of the site.
 - Ensuring the Site Recovery Director is aware of Entergy Corporate goals and expectations for recovery of IPEC after an event.
 - Ensuring adequate support to the site to carryout recovery activities.

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The remainder of the Indian Point Recovery Organization is established and an initial recovery plan developed at the end of the emergency phase or just after entry into the recovery phase. Consideration is given to recovery activity needs and use of the normal Indian Point Energy Center organizations. Individual recovery supervisors may be designated in any or all of the following areas:

- Training
- Radiation Protection
- Chemistry
- Technical Support
- Engineering Support
- Quality Assurance
- Operations
- Security
- Maintenance
- Special Offsite Areas (Community Representatives, Environmental Samples, Investigations, etc.)

3. Recovery Phase Notifications:

When the decision is made to enter the recovery phase, all members of the Indian Point Emergency Response Organization are informed of the change. All Indian Point Energy Center personnel are instructed of their roles in relation to the Indian Point Recovery Organization and their responsibilities to the recovery effort.

4. Total Population Exposure:

A method has been developed for estimating the total population exposure resulting from the accident. Total population exposure calculations are performed during the recovery phase of an accident. Cumulative data are collected from Indian Point Emergency Response Organization records to estimate the source term. Data are obtained from offsite agencies to estimate the total exposed population. Environmental TLDs, Bioassays, and continuing environmental monitoring results will be analyzed to provide additional data.

Part 2: PLANNING STANDARDS AND CRITERIA

Section N: Drill and Exercise Program

This section describes the Drill and Exercise Program that Entergy has implemented to:

- Verify the adequacy of the Indian Point Emergency Preparedness Program.
- Develop, maintain and evaluate the capabilities of the Indian Point Emergency Response Organization to respond to emergency conditions and safeguard the health and safety of Station personnel and the general public.
- Identify deficiencies in the Plan and the associated procedures, or in the training of response personnel, and ensure that they are promptly corrected.
- Ensure the continued adequacy of emergency facilities, supplies and equipment, including communications networks.

1. Exercises

- a. Federally prescribed **Exercises** are conducted biennially, which involve implementation of the participants' emergency plan(s) and activation of major portions of participating emergency organizations. Where full participation by offsite agencies occurs, the sequence of events simulates an emergency that results in the release of radioactivity to the offsite environs, sufficient in magnitude to warrant a response by offsite authorities. Offsite agencies involved in the planning effort for an emergency at the station shall be invited to participate at least every two years. For exercises involving only partial participation by these agencies, emphasis is placed on development and conduct of an exercise that is more mechanistically and operationally realistic. Players will be able, by implementing appropriate procedures and corrective actions, to determine the outcome of the scenario to a greater extent than when core damage and the release of radioactivity are prerequisites for demonstration of all objectives.
- b. Exercises provide an opportunity to evaluate the ability of participating organizations to implement a coordinated response to postulated emergency conditions. In accordance with the Indian Point Energy Center Eight-Year Exercise Cycle Plan (maintained in accordance with a fleet procedure), exercises are conducted to ensure that all major elements of the emergency plan and preparedness program are demonstrated. Exercises are scheduled to be conducted at different times of the year. An unannounced drill/exercise is included in the Eight-Year Exercise Cycle Plan.

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2. Drills:

In addition to the exercises described above, Indian Point Energy Center conducts drills for the purpose of training, testing, developing and maintaining the proficiency of emergency responders. Drills and/or surveillance tests are conducted at the Indian Point Energy Center for the following:

a. Communication Drills or Surveillance Tests:

- Monthly: The Radiological Emergency Communication System (RECS) link between the Control Room, EOF/AEOF and the State and four county Warning Points will be tested.
- Monthly: The Emergency Notification System with the NRC will be tested.
- Quarterly: The telephone links with Federal response organizations (i.e., Department of Energy Radiological Assistance Program) and County governments within the ingestion pathways will be tested. These links are normally tested by the State.
- Quarterly: The radio communication link between the Emergency Operations Facility, the Control Room and with the offsite survey team vehicles will be tested.
- Quarterly: The emergency communications links between facilities will be operationally checked (onsite and offsite facilities.)

Each of these drills or tests includes provisions to ensure that all participants in the test are able to understand the content of the messages (e.g. by requesting repeat-backs of information or verification of message transmittal forms).

Communications systems are also tested during the conduct of training drills and annual exercises. Any discrepancy is noted and actions are initiated to correct problems as soon as possible.

- b. Fire Drills: Drills for the Indian Point Fire Brigade are conducted in accordance with Technical Specifications and Station procedures.
- c. Medical Emergency Drills: a medical emergency involving a simulated contaminated individual in whom the operations personnel, the hospital, site first-aid team, radiation protection personnel and security force participate is conducted **annually** at each unit.
- d. Radiological Monitoring Team Drills: Radiological Monitoring Team drills are conducted at least **annually** and include provisions for the collection and analysis of environmental sample media (e.g. water, snow, vegetation, soil, and air), and the monitoring of radiological conditions outside the Indian Point Energy Center Protected Area. These drills include provisions for communications and record keeping.

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- e. **Radiation Protection Drills:** At least **semi-annually**, drills are conducted which involve response to, and analysis of, simulated airborne samples with elevated levels of activity. These drills also involve direct measurements of radiation levels in the Station and may include collection and analysis of sample media (e.g., water, vegetation, soil and air) and provisions for communications and record keeping. Normal station Radiation Protection rules and procedures are followed and emergency Radiation Protection procedures will be simulated.
- f. **Augmentation Drills:** At least semi-annually, drills are conducted to test the ability to augment the on-shift organization. These drills are conducted using the following methods:
 - Activation of the automated calling systems for all ERO responders as described in Section B calling in their anticipated arrival times and phone callouts being performed.
 - At least once **every eight years**, in the Eight Year Exercise Cycle Plan, a complete call out of ERO as described in Section B will be conducted with actual response to Emergency Response Facilities.
- g. **Combined Functional Drills:** Periodically, drills are conducted to test the interface, coordination, communication, and operation of the onsite emergency facilities including at least two of the following facilities: EOF, TSC, OSC and Joint Information Center. Drills should be developed and conducted to maximize training to participants. Coaching, mentoring, breaks for discussion should all be used when appropriate to aid participants in preparing for an actual emergency.

3. Conduct of Drills and Exercises:

For each emergency preparedness exercise or drill conducted, a scenario package is developed. The information included in the scenario package is in accordance with Energy Fleet Procedures which include at least the following information:

- The basic Objectives to be demonstrated during the drill or exercise.
- Date(s), time(s), and place(s) of postulated events,
- Scope of the drill or exercise and list of participating organizations,
- The simulated sequence of events and the estimated schedule for major events,
- Evaluation criteria should be provided as necessary to be used in determining the success of the drill or exercise,
- A narrative summary which includes at least the following information:
 - Events that are postulated to occur
 - Extent of simulation
 - Briefing materials to be provided to drill controllers and/or official observers and information on arrangements made for them.

Indian Point Energy Center Emergency Plan

Prior approval of Drill and Exercise Dates, by appropriate Indian Point Energy Center management is obtained for all drills and exercises conducted in support of the Emergency Preparedness Program.

4. Criteria and Evaluation:

Controllers/Observers are assigned to evaluate the drill or exercise performance. Following each drill or exercise, a critique is conducted to evaluate the ability of the participants to implement the Plan and procedures. Biennially, representatives from the NRC observe and evaluate an exercise including an evaluation of the licensee's ability to conduct an adequate self-critical critique. For full offsite participation exercises both the NRC and FEMA observe, evaluate, and critique.

5. Resolution of Drill and Exercise Findings:

The critique and evaluation process is used to identify areas of the Indian Point Energy Center emergency preparedness program that require improvement. The Emergency Planning Manager or his/her designee is responsible for evaluation of all recommendations and comments, entering required corrective actions into the Corrective Action Program and the determination regarding which of the items is to be incorporated into the Emergency Preparedness Program. Feedback is provided to participants through critiques, drill or exercise reports or during annual refresher training.

Part 2: PLANNING STANDARDS AND CRITERIA

Section O: Emergency Response Training

This section describes the emergency response training that is provided to those who may be called upon in an emergency. It outlines the training provided by Entergy to employees and offsite support personnel requiring site access.

1. Assurance of Training:

Entergy assures the training of appropriate station personnel through implementation of an Emergency Response Organization (ERO) Training program. Guidance is in place outlining how Initial and Continuing training of the ERO is completed. The required training for the Indian Point ERO positions that are defined in Section B of this Emergency Plan is described here.

Offsite training is offered to support organizations (fire, ambulance, medical providers, law enforcement agencies, etc.) that may be called upon to provide assistance in the event of an emergency. The following outlines the training received by these organizations:

- a. Specialized training is offered to the offsite agencies (fire, ambulance, medical providers, law enforcement agencies, etc.) that may be called upon to provide onsite assistance in the event of an emergency:

Training consists of the following:

- Notification Process
- Site Orientation
- Basic Radiation Protection
- Specific Interface

These courses do not qualify offsite personnel for unescorted access. Escorts are provided to assist support personnel.

This training may be provided by the Emergency Planning Department or by appropriate interfacing organizations such as Fire Protection, Security, Safety department and/or the Training Department. The Emergency Planning Department shall monitor training provided by other departments to ensure it meets requirements of this Plan. This requirement will normally be met by performing training observations.

- b. Indian Point Energy Center offers training support, as requested, for State and local agencies whose function is to provide assistance during an emergency at Indian Point Energy Center. Training is offered on an annual basis, or as needed. Training of offsite emergency response organizations is described in their respective radiological emergency plans.

Indian Point Energy Center Emergency Plan

2. Methods of Training

Members of the Indian Point ERO receive general and specialized classroom training as necessary, self-study and / or hands-on emergency response training.

Classroom training is used for initial qualifications as needed to provide individuals with basic knowledge needed to perform assigned functions.

Self-Study training is used for initial overview training and as refresher training for individuals to requalify to an ERO position.

Hands-on training is provided using one or more of the following methods:

- **Familiarization Sessions:** A familiarization session is an informal, organized tabletop discussion of predetermined objectives.
- **Walk-Throughs:** Consists of a facility walk-through to familiarize Indian Point ERO personnel with procedures, communications equipment and facility layout. Walk-throughs also provide the opportunity to discuss facility activities, responsibilities and procedures with an instructor.
- **Drills:** A drill is a supervised instruction period aimed at testing, developing and maintaining skills in a particular operation. Drills described in Section N of this Plan are a part of training. These drills allow each individual to demonstrate the ability to perform assigned emergency functions. During drills, on-the-spot correction of erroneous performance may be made and drill controllers or coaches/mentors will make a demonstration of the proper performance (may be during or subsequent to the drill in progress).

Exercises, drill evaluations and/or written tests are used to evaluate the effectiveness of the training accomplished. All key positions will be evaluated in a drill, exercise or tabletop prior to becoming qualified to fill the assigned position.

3. First Aid Response:

First Responder personnel are trained to respond to medical emergencies.

4. Indian Point ERO Training Program:

The Indian Point ERO personnel who are responsible for implementing this plan receive initial, specialized and annual continuing training. Training program details are maintained in Training Department Procedures.

State and local EOC personnel receive training as outlined in their respective plans. Entergy provides support as requested.

Indian Point Energy Center Emergency Plan

Indian Point Emergency Response Position assignments may be based upon an individual's normal daily function and area(s) of expertise. Position-specific training provides the individual with the skills and knowledge to satisfactorily perform emergency assignments. A computerized system is used to track initial/continuing training and drill/exercise participation.

New Indian Point ERO personnel receive an initial overview course which familiarizes them with the Plan by providing basic information in the following areas as well as specific information as delineated in the sections below:

- Planning Basis
- Emergency Classifications
- Indian Point ERO and Responsibilities
- Callout of Emergency Organization
- Emergency Response Facilities
- Communications Protocol/Emergency Public Information
- Offsite Organizations

Annual continuing training is provided to ensure personnel are informed of changes in the Plan, procedures, organization and facilities. Incumbents (except craft positions) are provided an operating experience reading assignment.

- a. Personnel Responsible for Management of an Emergency (Shift Manager, Emergency Director, EOF Manager, Emergency Plant Manager / Plant Operations Manager / TSC Manager and OSC Manager)

These positions receive specialized training in one or more of the following areas as applicable to their ERO responsibilities:

- Emergency Classifications
- Notifications
- Protective Action Recommendations
- Emergency Action Levels
- Emergency Exposure Control
- Command and Control Practices

Indian Point Energy Center Emergency Plan

b. Personnel Responsible for Accident Assessment:

The skills and knowledge required to perform plant stabilization and mitigation are a normal function of specific Nuclear Operations positions, as identified in Section B of this Plan. Power changes, planned and unplanned reactor shutdowns are handled on a normal operation basis. Subsequent plant stabilization and restoration is pursued utilizing normal operating procedures. Licensed Operators receive routine classroom and simulator training to ensure proficiency in this area.

To remove peripheral duties from the Nuclear Operations shift, those Emergency Organization positions responsible for accident assessment, corrective actions, protective actions, and related activities receive position-specific training.

c. Radiological Monitoring Teams and Radiological Analysis Personnel

Offsite Radiological Monitoring: Offsite radiological monitoring is performed by trained individuals who provide samples and direct readings for dose assessment calculations.

Offsite Monitoring Team members receive classroom and hands-on training in the following areas:

- Equipment and Equipment Checks
- Communications
- Plume Tracking Techniques

Personnel Monitoring: Trained individuals who monitor Station personnel and their vehicles for contamination during an emergency perform personnel monitoring. This monitoring will normally be done by Radiation Protection Technicians who are qualified to do this type of monitoring as part of their normal job.

If Non-Radiation Protection personnel are to be used as Personnel Monitoring Team members they shall receive classroom and hands-on training in the following areas:

- Personnel Monitoring Equipment and Techniques
- Radiological Survey Techniques
- Contamination Control Techniques
- Basic De-Contamination Techniques

Dose Assessment: Dose Assessment training includes the skills and knowledge necessary for calculation and interpretation of an offsite release and its impact on the environment under any meteorological condition. Individuals responsible for performing dose assessment are trained in the following areas:

- Computerized and Manual Dose Assessment
- Protective Action Recommendations

Indian Point Energy Center Emergency Plan

- Radiological Monitoring Team Interface
- Protective Action Guidelines associated with offsite plume exposure doses
- Basic Meteorology

d. Police, Security and Fire Fighting Personnel

Local Police and Fire Fighting Personnel: The local Police and Fire Departments are invited to receive training as outlined in Part 1.a of this section of the Emergency Plan.

Security: Indian Point Emergency Security Response is based upon a normal daily security function that is to safeguard the site. Security personnel receive specialized training in the following areas:

- Accountability
- Evacuation
- Search and Rescue
- Emergency Response Facility Activation and Access Control
- Radiation Protection for Security Outpost

Onsite Fire Fighting Personnel: Onsite fire fighting personnel are selected from Operations (or other on shift personnel) and receive their emergency response training as part of those groups in accordance with station Fire Protection Program documents.

- ### e. Repair and Damage Control Teams: Operations, Maintenance, Radiation Protection and Chemistry personnel are trained as part of their normal job specific duties to respond to both normal and abnormal plant operations. Part of this training includes an overview of OSC operations and immediate response actions individuals are to take when notified of an emergency and activation of their assigned facilities.

Operations personnel are trained to recognize and to mitigate degrading conditions in the plant. Operations personnel are trained to mechanically and electrically isolate broken or malfunctioning equipment, to isolate fluid leaks and to minimize transients.

Maintenance / I&C personnel are trained to troubleshoot and to repair damaged or malfunctioning electrical, mechanical, or instrumentation systems as appropriate to their job classification.

Radiation Protection personnel are trained to assess the radiological hazards associated with equipment repair and instruct personnel as to the appropriate protective clothing requirements, respiratory protection requirements, time limits, and other protective actions specific to the conditions present.

Indian Point Energy Center Emergency Plan

- f. First Aid and Rescue Personnel: First aid and rescue team members receive training as outlined in Part 3 of this section.
- g. Local Support Service Personnel: Local support service personnel providing assistance during an emergency are invited to receive training as outline in Parts 1.a and 1.b of this section.
- h. Communications Personnel: Indian Point ERO personnel receive training on communications protocol as a part of the initial Emergency Response Overview. Personnel using specialized communications equipment that is not part of their normal daily function receive initial and requalification training on the equipment. Personnel involved in notifications to offsite agencies receive specialized training in the notification process.
- i. Personnel responsible for Recovery: ERO personnel receive training on the Recovery organization and their Recovery functions.
- j. Drill/Exercise Evaluation Support: Controllers/Observers will be trained on their roles and responsibilities to support drill/exercise control and player evaluation.

5. General, Initial and Annual Training Program Maintenance

- a. Plant Access Training: All personnel with unescorted access to the station's Protected Area receive orientation training. Plant Access Training provides initial training and annual requalification training on the basic elements of the Indian Point Emergency Plan for all personnel working at Indian Point Energy Center. These elements include:
 - Station emergency alarms and their meaning
 - Assembly areas
 - Site evacuation procedures
 - Special precautions and limitations during an emergency
 - Purpose of the Indian Point Emergency Plan
 - Role of the worker during emergency
- b. Initial Training: Prior to becoming a qualified ERO member, personnel receive a first-time course that provides introductory knowledge to new members of the organization. Indian Point Energy Center provides initial emergency response overview and specific training to assigned ERO members as outlined in the Emergency Response Organization Training Program. Additionally, Indian Point Energy Center offers initial training to those offsite organizations that provide onsite support, as discussed in Part 1.a of this Section.

When an employee successfully completes the training requirements for an assigned emergency position, training is documented and the employee's name placed in the Emergency Telephone Directory. The completed training documents certify that the individual is qualified to perform their emergency functions.

Indian Point Energy Center Emergency Plan

- c. **Requalification Training:** Annual requalification training is provided to Indian Point ERO personnel. Requalification training consists of one or more of the following:
- Annual Requalification Evaluation
 - Classroom or hands-on training addressing changes to the Indian Point Emergency Response Organization, facilities, procedures and equipment
 - Drill participation
- d. **Update Training:** In some cases, it may be necessary to provide additional training prior to the annual requalification training. Changes to this Plan, Indian Point ERO, procedures, facilities or equipment may require training in an effort to maintain a proficient Indian Point ERO.

Program changes or deficiencies identified during drills, exercises or audits may require training to be performed prior to annual requalification training. Emergency Preparedness management evaluates the impact of these changes or deficiencies upon the effectiveness of the organization. As a result of this evaluation process, one or more of the following may occur:

- Specialized Classroom Training
- Hands-On Training
- Required Reading
- Drills
- Memo (email) Notifications

Part 2: PLANNING STANDARDS AND CRITERIA

Section P: Responsibility for the Maintenance of the Planning Effort

This section describes the responsibilities for development, review and distribution of the Plan and actions that must be performed to maintain the Indian Point Emergency Preparedness Program. It also outlines the criteria for insuring that personnel who perform the planning are properly trained.

1. Emergency Planning Staff Training

Emergency Planning Staff Members receive on-going training and experiences to maintain or improve their knowledge related to emergency planning. At least once each calendar year members of the Emergency Preparedness staff are involved in one of the following activities:

- Training courses specific to emergency preparedness.
- Training courses related to emergency preparedness management, such as problem solving, stress management or confrontation/media relations' courses.
- Observation of or participation in drills and/or exercises at other utilities or stations.
- Participation in industry review and evaluation programs.
- Participation in regional or national emergency preparedness seminars, committees, workshops or forums.
- Indian Point Energy Center Training courses in related areas, such as systems, operations, or radiological protection training.

2. Authority for Emergency Preparedness Effort:

The Site Vice President has overall authority and responsibility for the Indian Point Emergency Preparedness Programs. This includes the authority to provide the necessary resources to ensure the continuous state of readiness for the Emergency Response Organization.

The General Manager Plant Operations (GMPO) is responsible for ensuring adequate staffing of the ERO.

3. Emergency Planning Manager:

Entergy has designated a site Emergency Planning Manager who is responsible for the maintenance of the Indian Point Emergency Preparedness Program. In maintaining the program, the Emergency Planning Manager ensures the following:

- Development, maintenance and revision of the Plan and Implementing Procedures is accomplished in accordance with applicable regulations and industry standards.

Indian Point Energy Center Emergency Plan

- Development and maintenance of 50.54q evaluations of program changes.
- Adequate Entergy support is provided to ensure the maintenance of offsite emergency response plans and procedures for the State of New York and the local communities involved in response to an incident at Indian Point Energy Center.
- Entergy adequately supports the training program for offsite response personnel.
- Development and maintenance of a strong working relationship with State and local authorities responsible for Emergency Preparedness.
- Consistency is maintained between this Plan and its implementing procedures and the Emergency Plans and procedures of the State and local authorities.
- Preparation for and conduct of the EP drill and exercise program, and that the program meets all regulations and guidelines of the NRC.
- Emergency Response Facilities are maintained in a constant state of readiness.
- Appropriate files are maintained to document the activities of the Emergency Preparedness Program as required by law and regulations.
- Work coordinated with the communications group in development and implementation of the Emergency Preparedness Public Information program.
- Indian Point Energy Center is appropriately represented at state and local meetings dealing with emergency preparedness matters.
- Preparation of reports to the NRC, FEMA and other agencies on emergency preparedness matters.
- The alert and notification systems are maintained and tested in accordance with approved procedures.
- Emergency Preparedness staff is involved in a program to maintain an adequate knowledge of state of the art planning techniques and the latest applications of emergency equipment and supplies.
- Emergency Preparedness staff provides technical assistance to other Indian Point Energy Center organizations in areas of emergency preparedness.
- Coordination of EP Self-Assessment, Audits and Inspections.
- Development of and coordination of the EP budget to ensure program integrity.
- Corrective actions identified during the conduct of Exercises, Drills, Training, Audits and Inspections are tracked using the station's corrective action program.

Indian Point Energy Center Emergency Plan

4. Indian Point Emergency Plan Revisions:

This Plan is reviewed and updated as necessary, on an annual basis. The annual update includes required changes identified during training, drills and exercises. The Emergency Planning Manager is responsible for determining which recommended changes are incorporated into the Plan. Editorial changes to the Plan can be held until the annual Plan update. If no change to the Plan is required a memo to file shall be maintained to document annual review.

Revisions to the Plan that: reduce the effectiveness of the Emergency Plan, when determined through the technical review process or other changes deemed appropriate by the Emergency Planning Manager will be reviewed by the onsite safety review committee prior to implementation.

Changes to the Plan are made without NRC approval only if such changes do not reduce the effectiveness of the Plan, and the Plan as changed continues to meet the standards of 10CFR50.47(b) and 10CFR50, Appendix E. This will be determined using the 50.54q review process. Proposed changes that reduce or have a potential to reduce the effectiveness of the approved Plan are not implemented without prior approval by the NRC.

Plan Implementing Procedures shall be developed and revised concurrent with the Plan and reviewed in accordance with station procedures.

Technical reviews of the Plan and procedures shall be conducted in accordance with station procedures. Individuals that conduct the technical review and safety review shall be qualified in accordance with station requirements. The reviewer shall determine the need for cross-disciplinary reviews. Revisions to the Emergency Plan and Implementing Procedures shall be reviewed and approved by the Emergency Planning Manager prior to implementation.

State and County personnel are provided the opportunity to review the Emergency Action Levels (EALs) annually and upon any changes made to the EALs.

5. Emergency Plan Distribution:

Controlled copies of the Plan and Implementing Procedures are issued to all appropriate locations onsite, as well as Nuclear Regulatory Commission. The State and Counties are provided with the Emergency Plan only. Verified copies may be used for position specific procedure sets used by the Emergency Response Organization. Procedure requirements include use of revision numbers and required page identifications (i.e. section of plan, revision number, etc.). Controlled copies of the EAL wall charts are issued to appropriate locations. The distribution of these wall charts is maintained by the Emergency Planning Department.

Indian Point Energy Center Emergency Plan

6. Supporting Emergency Response Plans:

Other plans which support this Plan are:

- Federal Radiological Emergency Response Plan
- State of New York Radiological Emergency Response Plan
- Westchester County Radiological Emergency Response Plan
- Rockland County Radiological Emergency Response Plan
- Orange County Radiological Emergency Response Plan
- Putnam County Radiological Emergency Response Plan

Each of these plans has associated Implementing Procedures.

7. Implementing and Supporting Procedures:

Appendix 3 of this Plan contains a listing, by number and title, of those procedures that implement this Plan during an emergency. Administrative procedures that outline the steps taken to maintain the Indian Point Emergency Preparedness Program have been developed. All Emergency Plan Implementing Procedures are reviewed biennially.

Major revisions to the procedures are reviewed by the departments or ERO positions affected (i.e. departments or individuals to whom responsibilities are assigned or changed) prior to their approval. (NOTE: Only one individual qualified for a given position is required to review a procedure change and an ERO facility management position can review changes within his/her facility or functional area.) Implementing procedures are reviewed and approved in accordance with approved station procedures.

8. Cross Reference to Planning Criteria:

The Plan is formatted in the same manner as NUREG-0654, FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in support of Nuclear Power Plants", Revision 1. This allows for ease in auditing evaluation criteria and eliminates the need for a cross-reference.

9. Review of Indian Point Emergency Preparedness Program: An assessment (audit) of the emergency preparedness program is performed by the Indian Point Nuclear Quality Assurance (NQA) organization. The assessment will be performed either at intervals not to exceed 12 months or as necessary, based on an assessment by NQA against the emergency preparedness performance indicators, and after changes in personnel, procedures, equipment, or facilities that could adversely affect emergency preparedness, but no longer than 12 months after the change. In any case, all elements of the emergency preparedness program are reviewed at least once every 24 months. The Quality Assurance Program provides the management controls for documenting, reporting and retaining audit results and for evaluation and correcting audit findings.

Indian Point Energy Center Emergency Plan

Results of this audit are submitted for review to the Station's Vice President. The Emergency Planning Manager ensures that any findings that deal with offsite interfaces are reviewed with the appropriate agencies. Records of the audit are maintained for at least five years.

On an annual basis, a report of the Emergency Planning activities for the year will be presented to the onsite safety review committee. Such activities include: Plan and procedure revisions, drill/exercise results, and audit/inspection results. Additional activities may be added as deemed appropriate by the Emergency Planning Manager.

10. Maintenance of Emergency Telephone List

A phone list(s) contains telephone numbers used by the Emergency Response Organizations during an emergency. These numbers are verified and updated at least quarterly.

Appendix 1: References

References consulted in the writing of this Emergency Plan are listed in this section. With exception of regulatory requirements, inclusion of material on this list does not imply adherence to all criteria or guidance stated in each individual reference.

1. 10CFR50.47, Emergency Plans
2. 10CFR50 Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities
3. 10CFR20, Standards for Protection Against Radiation
4. Code of Federal Regulations, Title 10, Chapter I Parts 70, 73, and 100.
5. Code of Federal Regulations, Title 33, Chapter I, Part 153.
6. Code of Federal Regulations, Title 40, Chapter I, Parts 110, 112, 116, 118, 302 and 355.
7. Code of Federal Regulations, Title 44, Chapter I, Part 401.
8. Code of Federal Regulations, Title 49, Chapter I, Parts 171 and 172.
9. NUREG-0654, FEMA-REP-1, Revision 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
10. NUREG-0696, Revision 1, Functional Criteria for Emergency Response Facilities
11. NUREG-0396, "Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants," Dec. 1978.
12. NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations."
13. NUREG-0696, Revision 1, Functional Criteria for Emergency Response Facilities
14. NUREG-0737, Clarification of TMI Action Plan Requirements, dated October 1980.
15. NUREG-0737, Supplement 1, Requirements for Emergency Response Capability, December 1982.
16. EPA 400-R-92-001, Manual of Protective Action Guides and Protective Actions for Nuclear Incidents
17. "FEMA REP Program Manual"
18. Indian Point Energy Center Unit 1, 2 and 3 FSARs
19. Indian Point Energy Center Unit 1, 2 and 3 Tech Specs
20. USNRC Reg. Guide 1.101, "Emergency Planning & Preparedness for Nuclear Power Plants"
21. 10CFR50, Appendix R
22. SANDIA 77-1725
23. INPO Emergency Resources Manual

Appendix 1: References (cont.)

24. "Maintaining Emergency Preparedness Manual," dated November, 1987 INPO 87-019.
25. "Federal Bureau of Investigation and Nuclear Regulatory Commission Memorandum of Understanding for Cooperation Regarding Threat, Theft, or Sabotage in U.S. Nuclear Industry," Federal Register, Vol. 44, p. 75535, December 20, 1979.
26. "Voluntary Assistance Agreement By and Among Electric Utilities involved in Transportation of Nuclear Materials," dated November 1, 1980.
27. Comprehensive Environmental Response, Compensation and Liability Act of 1980.
28. Accidental Radioactive Contamination of Human Food and Animal Feeds; Recommendation for State and Local Agencies, Volume 47, No. 205, October 22, 1982.
29. American Nuclear Insurers Bulletin #5B (1981), "Accident Notification Procedures for Liability Insured's".
30. "Potassium Iodide as a Thyroid Blocking Agent in a Radiation Emergency: Final Recommendations on Use," Federal Register Vol. 47, No. 125, June 29, 1982.
31. INPO Coordination agreement on emergency information among USCEA, EPRI, INPO, NUMARC and their member utilities, dated April (1988).
32. Babcock and Wilcox Company, Post Accident Sample Offsite Analysis Program (1982).
33. ANI/MAELU Engineering Inspection Criteria For Nuclear Liability Insurance, Section 6.0, Rev. 1, "Emergency Planning."
34. NEI 99-01 Rev 5, "Methodology for Development of Emergency Action Levels"
35. USNRC Reg. Guide 1.23, Revision 1, "Meteorological Monitoring Programs for Nuclear Power Plants", March 2007
36. INPO 09-006 Guidelines for Training and Qualification of Emergency Response Organization Personnel
37. NYS Radiological Emergency Preparedness Plan Appendix K, Rev 7/13
38. NUREG-0654 – FEMA – REP – 1, REV.1, Supplement 3, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.
39. Westchester County Fire Mutual Aid Plan
40. IPEC Security Safeguards Contingency Plan and Incident Response Plan
41. NSIR/DPR – ISG-01 "Interim Staff Guidance – Emergency Planning For Nuclear Power Plants", ADAMS Accession No. ML113010523 pages 18 to 21.

Indian Point Energy Center Emergency Plan

Appendix 2: Letters of Agreement

Copies of agreement letters for the offsite emergency response supporting organizations listed below are contained in this appendix.

1. Verplanck Fire Protection Association (Fire/Ambulance)
2. Buchanan Fire Department
3. Hudson Valley Hospital Center at Peekskill / Cortlandt
4. Phelps Memorial Hospital Center
5. Department of Energy – Radiation Emergency Assistance
6. Westinghouse Electric Corporation
7. Institute of Nuclear Power Operations (INPO)
8. New York State Police
9. New York State Disaster Preparedness Commission

As Letters of Agreement are received and updated they will be added to this section. A revision to the EPLAN is not necessary to update Letters of Agreement. Letters in this section are the current letters as of the date of this revision.

The Letters of Agreements (LOAs) with outside support organizations and government agencies are reviewed and confirmed annually in accordance with NUREG 0654 P.4. These letters are updated as needed. Letters with no specific end date remain in effect until terminated in writing by either party. This has been agreed to by the applicable supporting agencies.

Indian Point Energy Center Emergency Plan

Appendix 2: Letters of Agreement

NOTE 1: Copies of agreement letters for the offsite emergency response supporting organizations listed below are contained in this appendix.

NOTE 2: As Letters of Agreement Are received and updated they will be added to this section. A revision to the EPLAN is not necessary to update Letters of Agreement, nor this page. Letters in this section are the current letters as of the date of this revision.

NOTE 3: The Letters of Agreement (LOAs) with outside support organizations and government agencies are reviewed and confirmed annually in accordance with NUREG 0654 P.4. These letters are updated every two years as needed.

Agency Letter of Agreement is With	Date of Letter	Date of Expiration of this LOA
Verplanck Fire Protection Association (Fire / Ambulance)	July 30, 2014	NO EXPIRATION
Buchanan Fire Department	Not Dated	NO EXPIRATION
Hudson Valley Hospital Center at Peekskill / Cortlandt	June 27, 2014	NO EXPIRATION
Phelps Memorial Hospital Center	April 3, 2014	NO EXPIRATION
Department of Energy Radiation Emergency Assistance	July 14, 2014	NO EXPIRATION
Westinghouse Electric Corporation	January 13, 2014	NO EXPIRATION
Institute of Nuclear Power Operations (INPO)	October 30, 2012	NO EXPIRATION
New York State Police	July 7, 2014	NO EXPIRATION
New York State Office of Emergency Management	July 3, 2014	NO EXPIRATION

BOARD OF FIRE COMMISSIONERS

Verplanck Fire District

238 Eighth Street

P.O. Box 356

Verplanck, New York 10596

Business Phone 914-788-6940 - Fax Number 914-737-3932

Commissioners

David K. Smyth, Chairman – Cleo Cueves, Deputy Chairman

Glenn T. Welch - Charles A. Graven -Michael Breen, Treasurer

Frank Simeone, Attorney

July 30, 2014

Mr. Michael L. Miele
Manager, Emergency Planning
Indian Point Energy Center
450 Broadway
P.O. Box 249
Buchanan, New York 10511-0249

Mr. Miele,

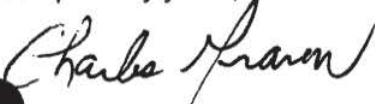
This letter is to affirm that, in the event of an emergency situation or accident at the Entergy Nuclear Northeast Plant, the Verplanck Fire Department and/or ambulance will respond upon notification. This response may include providing firefighting equipment and services for providing pumping capability to supply Hudson River water to select connection points. This response may be for large Accelerant fed fires. The Verplanck Fire Department will also respond to Hostile Action Based events And coordinate with other responding agencies

In addition to emergency response to the Indian Point Nuclear Power Plant, the Verplanck Fire District agrees to allow IPEC the use of designated areas of the firehouse. The use of The facility will include use for staging of IPEC employees as well as storage of equipment and as area for command staff.

The proper means of notification is to telephone the emergency number 911, for both the fire department and ambulance. Please give all available information at the time of notification. Should the ambulance respond, and after initial first aid treatment, we will then provide ambulance transportation to the appropriate or designated medical facility, which will be determined by the extent or type of injuries.

If at any time you feel that you have a unique situation that may require a pre-plan, please feel free to contact us at your convenience at (914)737-8233.

Respectfully yours,



Charles Graven
Commissioner
Verplanck Fire District



Organized December, 1940

Buchanan Engine Co., No. 1, Inc.

159 Albany Post Road, Buchanan, New York 10511

— Member of —

*Firemen's Association of The State of New York
Hudson Valley Volunteer Firemen's Association
Westchester County Volunteer Firemen's Association
Westchester County Fire Chief's Association*

**For Emergency
Dial 911**

**Business Phone
737-5010**

**Chief's Office
737-0334**

To: Emergency Planning Manager
Indian Point Entergy Center
Entergy Nuclear Northeast
450 Broadway
Buchanan, NY 10511

Re: Letter of Agreement for Emergency Response

This letter is to confirm the intent of Buchanan Engine Co. #1 Inc. We will respond to an emergency situation at the Indian Point Energy Center under the Westchester County Mutual Aid Plan.

Buchanan Engine Co. No. #1 Inc. will provide equipment and emergency services for assistance to Entergy Nuclear Northeast. This response may include firefighting equipment including trained manpower. Along with services for providing pumping capabilities to supply Hudson River water to Pre-Arraigned connection points at the facility. This response may be to large accelerant fed fires, hostile based events, and any other incidents that may require our services.

If you have any questions regarding this agreement, please feel free to contact me at (914) 737-0334.

Sincerely

Marion Cilento
Chief of Department



June 26, 2014

Mr. Michael Miele
Manager of Emergency Planning
Energy/Indian Point Energy Center
P.O. Box 308
Buchanan, NY 10511

To Mr. Miele—

Enclosed please find an original agreement between Hudson Valley Hospital Center and the Indian Point Energy Plant Center.

Please return a signed copy to our office and retain the original copy for your records.

Sincerely,

A handwritten signature in cursive script that reads "Ellen Mauro".

Ellen Mauro
Administrative Assistant
For Kathy Webster, Vice President of Patient Services

Enclosure

OUR EXPERTISE THROUGHOUT THE REGION

Radiology Centers | The Wellness Club | Physical Therapy Centers

COLD SPRING • CROTON-ON-HUDSON • HOPEWELL JUNCTION • MAHOPAC • PUTNAM VALLEY • YORKTOWN HEIGHTS



This agreement made this Twenty seventh day of June, 2014 between HUDSON VALLEY HOSPITAL CENTER, 1980 Crompond Road, Cortlandt Manor, New York 10567 (hereinafter referred to as "Hospital) and the Indian Point Energy Center Plants, P.O. Box 308, Buchanan, New York 10511.

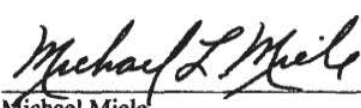
1. The Hospital will accept as patients, in accordance with the plant and Hospital procedures, any personnel from the Indian Point Energy Center Plants who may be considered to have sustained radiation injuries and/or who may have been exposed to radioactive material, provided that: All potentially contaminated patients will be accompanied to the Hospital by the Indian Point Facility personnel; and the Indian Point Facility will take all appropriate precautionary radioactive contamination measures and will advise the Hospital by telephone in advance of patient's arrival, of the patient's status, and radiation hazard.
2. The Indian Point Energy Center will:
 - a. Pay the Hospital the sum of *\$30,000 each year* and in addition thereto, will;
 - b. Compensate or reimburse the Hospital for all materials and equipment consumed or which must be destroyed or replaced due to radiation.
 - c. Indemnify and hold the Hospital harmless from any and all claims of third persons resulting from radiation exposure not resulting from the Hospital's negligence.
 - d. Be responsible for decontaminating the Hospital's equipment and property and disposing of materials contaminated as a result of services rendered to personnel of Entergy.

HUDSON VALLEY HOSPITAL CENTER



Jean C. Federspiel
President

ENTERGY NUCLEAR NORTHEAST
INDIAN POINT ENERGY CENTER



Michael Miele
Indian Point ENTERGY Center
Manager of Emergency Planning

Phelps Memorial Hospital Center
701 North Broadway
Sleepy Hollow, New York 10591-1096

P H E L P S

April 3, 2014

Mr. Michael L. Miele
Manager, Emergency Planning
Entergy
Indian Point Energy Center
450 Broadway, Suite 2
Buchanan, NY 10511


Dear Mr. Miele:

This letter will confirm that Entergy will pay Phelps Memorial Hospital Center a sum of \$30,000 per year, in accordance with our agreement to accept as patients any personnel from the Indian Point Energy Center who may be considered to have sustained radiation injuries and/or contamination.

While this agreement is valid until terminated via written notice, we want to confirm that Phelps continues to appreciate the mutual advantages of our long-standing partnership.

It is a pleasure to continue to work together for the benefit of our community.

Yours truly,


Keith F. Safian, FACHE
President and C.E.O.

/al
cc: Antonio Iraola



Department of Energy

ORNL Site Office
P.O. Box 2008
Oak Ridge, Tennessee 37831-6269

July 14, 2014

Mr. Alain Grosjean
Senior Project Manager
Entergy Nuclear
450 Broadway
Buchanan, New York 10511

Dear Mr. Grosjean:

LETTER OF AGREEMENT - RADIATION EMERGENCY ASSISTANCE CENTER/TRAINING SITE (REAC/TS) SUPPORT

Please reference your letter dated July 1, 2014, requesting that the Department of Energy (DOE) REAC/TS facilities and team continue to be available to provide back-up capability and assistance to the Entergy Nuclear's nuclear facilities in the event of a radiological emergency. This response constitutes our agreement to provide this service upon your request. The agreement remains in effect until terminated in writing by either party.

We wish to remind you that our REAC/TS facilities in the Oak Ridge Institute for Science and Education (ORISE) are government controlled and operated by the Oak Ridge Associated Universities under contract with DOE. Therefore, REAC/TS is prohibited from competing with commercial firms that can provide radiological emergency services. Only if the magnitude or uniqueness of a radiological emergency exceeds your in-house and commercially available capabilities would REAC/TS be authorized to provide back-up services.

Since these facilities are government controlled, no fee or retainer is required to assure the availability of back-up services by REAC/TS. However, if you utilize the services of REAC/TS, we should expect to recover those costs that could reasonably be related to handling such an incident, including all charges billed to DOE or ORISE by hospitals and physicians. Information concerning the REAC/TS facilities, staff, services available, and procedures for seeking REAC/TS assistance can be obtained by direct contact with the REAC/TS Director, Dr. Albert Wiley, ORISE, Post Office Box 117, Oak Ridge, Tennessee 37831, or at telephone number (865) 576-3131.

Sincerely,

A handwritten signature in cursive script, reading "M. G. Branton".

Michele G. Branton
Contracting Officer's Representative

cc:
Matthew P. Albert, ORISE
Albert L. Wiley, ORISE



Westinghouse Electric Company
Nuclear Services
Waltz Mill Service Center
P.O. Box 158
Madison, Pennsylvania 15663
USA

Mr. John Dinelli
Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
450 Broadway
Buchanan, NY 10511

Direct tel: 724-722-5658
Direct fax: 860-683-6048
e-mail: dietrial@westinghouse.com

Our ref: IPP-14-4
INT-14-3

January 13, 2014

Entergy Nuclear Operations, Inc.
Indian Point Units 2 & 3
Westinghouse Emergency Response Plan Roster Revision

Dear Mr. Dinelli:

Attached for your information is the updated contact list for the Westinghouse Electric Company LLC Emergency Response Plan, January 2014 revision. Your initial contacts for Indian Point Units 2 and 3 are as follows:

Plant	Title	Name	Office	Home	Cell Phone
IPP/INT	First Contact	Steve Harms	914-254-6420	(b)(6)	(b)(6)
IPP/INT	1 st Alternate	Tony Dietrich	724-722-5658	(b)(6)	(b)(6)
IPP/INT	2 nd Alternate	Sallie Carrera	724-722-6447	(b)(6)	(b)(6)

If you have any questions, please contact me at 724-722-5658.

Best regards,

**Electronically Approved*

Anthony L. Dietrich
Customer Account Manager

/slb

This document is the property of and contains ~~Proprietary Information~~ owned by Westinghouse Electric Company LLC and/or its subcontractors and suppliers. It is transmitted to you in confidence and trust, and you agree to treat this document in strict accordance with the terms and conditions of the agreement under which it was provided to you.

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cc: John Ventosa Entergy
John Kirkpatrick Entergy
Rich Burroni Entergy
Bob Walpole Entergy
Brian Sullivan Entergy
Steve Harms Westinghouse
Sallie Carrera Westinghouse



*Institute of
Nuclear Power
Operations*

Suite 100
700 Galleria Parkway, SE
Atlanta, GA 30339-5943
770-644-8000
FAX 770-644-8549

October 30, 2012

Dear Ladies and Gentlemen:

This letter certifies that the plant emergency assistance agreement between INPO and its member utilities remains in effect. In the event of an emergency at your utility, INPO will assist you in acquiring the help of other organizations in the industry, as described in Section 1 of the Emergency Resources Manual, INPO 03-001, and in the United States Nuclear Industry Response Framework. If requested, INPO will provide the following assistance:

- coordinate technical information flow from the affected utility to the nuclear industry and government agencies
- coordinate the procurement and shipping of equipment and supplies
- locate personnel with technical expertise
- facilitate industry vendor and commercial supplier support
- obtain technical information and industry operating experience regarding plant components and systems
- provide an INPO liaison to facilitate interface

This agreement will remain in effect until terminated in writing. Should you have any questions, please call Steve Meng at (770) 644-8548 or e-mail at MengSW@inpo.org.

Sincerely,

Jeffrey T. Gasser
Vice President
Emergency Response

JTG:cjm



NEW YORK STATE POLICE

**Troop "K" Headquarters
2541 Route 44
Salt Point, NY 12578**

**JOSEPH A. D'AMICO
SUPERINTENDENT**

**R.H. BENZIGER
TROOP COMMANDER**

July 7, 2014

Mr. Michael Miele
Manager, Emergency Planning
Indian Point Energy Center
Entergy Nuclear Northeast
295 Broadway, Suite 2
Buchanan, NY 10511

Dear Mr. Miele:

The Division of State Police will continue to respond to requests for routine police service at your facility. In addition, the Division will supply support activities, including support for Hostile Action Based events, as set forth in the New York State Radiological Emergency Preparedness Plan and Article 2-B of the New York State Executive Law. In regards to other matters of a police nature, our members are governed by statute and will respond within the constraints of such laws when a violation of law appears probable, is attempted, or occurs.

The communications equipment installed at our Hudson Valley Traffic Management Center (TMC) allows for continuous communication capability with the Indian Point nuclear facilities, and for any emergency contingency that may arise.

Sincerely,

A handwritten signature in black ink that reads "R. H. Benziger".

R. H. Benziger
Major - Troop "K" Commander



NEW YORK STATE
DIVISION OF HOMELAND SECURITY AND EMERGENCY SERVICES
OFFICE OF EMERGENCY MANAGEMENT



Jerome M. Hauer, Ph.D., MHS, Commissioner

William R. Davis, Jr., Director

July 3, 2014

MaryAnn Wilson
Energy Nuclear Operations
44 Hamilton Ave.
White Plains, NY 10601

Dear Ms. Wilson:

This serves to update the annual agreement letter between the Indian Point Energy Center Facilities and New York State Emergency Management Office for the Radiological Emergency Preparedness Program.

In the event of an emergency at the Indian Point Energy Center Power Plants, New York State will respond in accordance with the applicable policies and procedures delineated within the State Radiological Emergency Preparedness Plan.

If you have any questions or require more detailed information, please contact Ted Fisch, Chief of Radiological Preparedness Program at (518) 292-2308.

Sincerely,

Daniel O'Hara
Deputy Director

Indian Point Energy Center Emergency Plan

Appendix 3: Procedure Cross-Reference to Sections of the Plan

Emergency Plan Implementing Procedures to Plan Sections

Number	Subject Addressed	IPEC Emergency Plan Section(s)
IP-EP-115	Emergency Plan Forms	All
IP-EP-120	Emergency Classification	D, Table D-1
IP-EP-250 IP-EP-220 IP-EP-210	Emergency Management	B, Table B-1
IP-EP-210	Control Room Augmentation	B, Table B-1
IP-EP-220	TSC Activation and Response	H, Table B-1
IP-EP-230	OSC Activation and Response	H, Table B-1
IP-EP-250 IP-EP-251	EOF Activation and Response	H, Table B-1
IP-EP-230 IP-EP-250	Radiation Protection, Emergency Exposure Controls and Response	J, K
IP-EP-240	Emergency Security Organization Activation and Response	B, Table B-1 O
IP-EP-241	Incident Command Post	B, Table B-1
IP-EP-310	Offsite Dose Assessment	I, Table B-1
IP-EP-330	Airborne Sample Analysis	I
IP-EP-350	Emergency Contamination Control	K
IP-EP-360	Core Damage Assessment	I
IP-EP-410	Protective Action Recommendations	J
IP-EP-420	Use of Potassium Iodide by Indian Point Personnel During and Emergency	K.2
IP-EP-251	Alternate EOF Activation and Response	H
IP-EP-510 IP-EP-520	Data Equipment Operation	B.5, Table B-1
IP-EP-320	Offsite Monitoring Team Activation and Response	I
IP-EP-240 IP-EP-430	Evacuation/Accountability	J
IP-EP-230 IP-EP-430	Search and Rescue	J
IP-EP-610	Termination and Recovery	M
IP-EP-620	Estimating Total Population Exposure	M
IP-EP-260	Joint Information Center Procedure Set	B, G
IP-EP-610	Emergency Preparedness Corporate Support	A, B
IP-1052	Hazardous Waste Emergencies	Part I, Section C
IP-1055	Fire Emergency Response	Part I, Section C
0-AOP-SEC-2	Air Craft Threat	Part I, Section C

Indian Point Energy Center Emergency Plan

Emergency Preparedness Administrative Procedures

The following procedures do not implement the Emergency Plan during emergencies, but do outline maintenance of the program as required by the applicable sections of the Plan.

Number	Subject Addressed	IPEC Emergency Plan Section(s)
IP-EP-AD1	Emergency Preparedness Department Organization and Responsibilities	P
IP-EP-AD2	Emergency Plan Controlled Documents	P
EN-TQ-110	Emergency Response Training Program	O
EN-EP-306	Drills and Exercises	N
EN-FAP-EP-005	Emergency Preparedness Performance Indicator Program	N
IP-EP-AD6	Emergency Preparedness Department Facilities and Equipment Surveillances	E, F, H, I, J
EN-EP-310	Notifications Systems Testing and Maintenance	F, N
IP-EP-AD10	Offsite Emergency Preparedness Support	A, O
IP-EP-AD12	Tone Alert Radio Program	E
IP-EP-AD13	Emergency Action Levels Technical Basis Document	D, I, J
IPEP-AD-16	Emergency Planning Records	All
IP-EP-AD 17	Emergency Planning Equipment Administration	E, F, H, I, J
EN-EP-801	Emergency Response Organization	B
IP-EP-AD20	IPEC Alert Notification System Test	E
IP-EP-AD-30	ATI Siren System Administration	E.6
IP-EP-AD-31	ATI Siren System Maintenance Administration	E
IP-EP-AD-32	ATI Siren System Routine Polling and Testing	E
IP-EP-AD-33	ATI Siren System Quarterly Preventive Maintenance	E
IP-EP-AD-34	ATI Control Station Semi-Annual Preventive Maintenance	E
IP-EP-AD-35	ATI Siren System Site Annual Preventive Maintenance	E
IP-EP-AD-36	ATI Repeater Tower Semi-Annual Preventive Maintenance	E

Indian Point Energy Center Emergency Plan

Number	Subject Addressed	IPEC Emergency Plan Section(s)
IP-EP-AD-37	ATI Solar Powered Siren Semi-Annual Preventive Maintenance	E
IP-EP-AD-38	ATI Repeater Site Annual Preventive Maintenance	E
IP-EP-AD-39	ATI Control Station Annual Preventive Maintenance	E
IP-EP-AD-40	Equipment Important to Emergency Response	E, F, G, H, I, J
IP-EP-AD41	ATI Siren Site Annual Sample Preventative Maintenance	E

Indian Point Energy Center Emergency Plan

Appendix 4

Abbreviations, Acronyms and Definitions

Any abbreviation followed by a lower case 's' denotes the plural form of the term.

AC	Alternating Current
AEOF	Alternate Emergency Operations Facility
ALARA	As Low As Reasonably Achievable
ANI	American Nuclear Insurers
ANSI	American National Standards Institute
ARM	Area Radiation Monitor
CB	Citizen Band
CDE	Committed Dose Equivalent
cc	cubic centimeter
CR	Control Room
CFR	Code of Federal Regulations
CIC	Corporate Information Center
cm ²	square centimeter
Cs	Cesium
dc	direct current
DE	Dose Equivalent
DHS	Department of Homeland Security
DOE	U. S. Department of Energy
DOT	U. S. Department of Transportation
dpm	disintegration per minute
EAL	Emergency Action Level
EAS	Emergency Alerting System
ENS	NRC Emergency Notification System
EOC	Emergency Operations Center
EOF	Emergency Operations Facility
EOP	Emergency Operating Procedure
EPA	U. S. Environmental Protection Agency
EPZ	Emergency Planning Zone
ERDS	Emergency Response Data System
FEMA	Federal Emergency Management Agency
FRERP	Federal Radiological Emergency Response Plan
FSAR	Final Safety Analysis Report
Ge	Germanium
GET	General Employee Training

Indian Point Energy Center Emergency Plan

Appendix 4

Abbreviations, Acronyms and Definitions

I.....	Iodine
INPO.....	Institute of Nuclear Power Operations
IP1, IP2, or IP3.....	Indian Point Energy Center Unit 1, 2 or 3
IPEC.....	Indian Point Energy Center
IRAP.....	Interagency Radiological Assistance Program
JIC.....	Joint Information Center
Li.....	Lithium
LOCA.....	Loss of Coolant Accident
mR.....	milliroentgen
NRC.....	U. S. Nuclear Regulatory Commission
NSRAC.....	Nuclear Safety Review and Audit Committee
OSC.....	Operations Support Center
PAG.....	Protective Action Guide
PAR.....	Protective Action Recommendation
PASS.....	Post Accident Sampling System
POM.....	Plant Operations Manager
R.....	roentgen
RACES.....	Radio Amateur Civil Emergency Services
RECS.....	Radiological Emergency Communications System
RERP.....	Radiological Emergency Response Plan
RMT.....	Radiation Monitoring Team
SCBA.....	Self Contained Breathing Apparatus
SPDS.....	Safety Parameter Display System
Sr.....	Strontium
STA.....	Shift Technical Advisor
TAG.....	Technical Assessment Group
TDD.....	Telecommunications Device for the Deaf
TLD.....	Thermoluminescent Dosimeter
TSC.....	Technical Support Center
μCi.....	microcuries

Appendix 4

Abbreviations, Acronyms and Definitions

Definitions

Accountability - The process used by the Onsite Emergency Organization to identify potentially missing and/or injured personnel within the Protected Area during an emergency. This process is accomplished within 30 minutes and is normally maintained throughout the event.

Activated – An order has been made to activate an emergency response facility, and the facility is in the process of being staffed.

Annual – Frequency of occurrence equal to once per calendar year, between January 1st and December 31st.

Area Radiation Monitors - Fixed radiation detectors placed in strategic locations throughout the Station for the purpose of continuously monitoring area radiation dose rates; an integral part of the Radiation Monitoring System that provides the Unit 2 and Unit 3 Control Rooms with remote monitoring capabilities.

Assembly – The process of relocating onsite personnel, during an emergency to a pre-designated location. Generally speaking all onsite personnel who do NOT have an emergency response assignment (non-essential personnel) relocate to an "Assembly Area." Those onsite personnel who are assigned emergency response functions (essential personnel) respond to their assigned emergency facility.

Assembly Area – A pre-designated area to which non-essential personnel relocate during an emergency. The primary Assembly Areas at IPEC are the Generation Support Building (GSB) and the Energy Education Center (EEC). The back-up Assembly Area, normally used only during periods of high personnel volume (e.g. outage), is the Indian Point Energy Center Training Center.

Assessment Actions - Those actions taken during or after an accident to obtain and process information that is necessary to make decisions to implement specific emergency measures.

Biennial – Frequency of occurrence equal to once per two calendar years.

Classification - The classification of emergencies is divided into FOUR (4) categories or conditions, covering the postulated spectrum of emergency situations. Each emergency classification is characterized by Emergency Action Levels (EALs) or event initiating conditions. The four classifications address emergencies of increasing severity.

Committed Dose Equivalent - The dose equivalent to organs or tissues of reference that will be received from an intake of radioactive material by an individual during the 50-year period following the intake.

Corrective Actions - Those emergency measures taken to ameliorate or terminate an emergency situation at or near its source.

Indian Point Energy Center Emergency Plan

Appendix 4

Abbreviations, Acronyms and Definitions

County Emergency Operations Center - Each of the four (4) counties (Westchester, Rockland, Putnam and Orange) surrounding the site has an Emergency Operations Center from which the County officials evaluate and coordinate all County activities during an emergency.

Dose Equivalent - The product of the absorbed dose in tissue, quality factor, and all other necessary modifying factors at the location of interest. The unit of dose equivalent is the Rem.

Dose Projection - The calculated estimate of a radiation dose to individuals at a given location (normally off-site), determined from the source term/quantity of radioactive material (Q) released, and the appropriate meteorological dispersion parameters (X/Q).

Drill - A supervised instruction period aimed at testing, developing and maintaining skill in a particular operation.

Emergency Action Level (EAL) - A predetermined, site-specific, observable threshold for a plant Initiating Condition that places the plant in a given emergency class. (NUMARC/NESP-007).

Emergency Alert System (EAS) - A network of broadcast stations and interconnecting facilities which have been authorized by the Federal Communications Commission to operate in a controlled manner during a war, state of public peril or disaster, or other national or local emergency. In the event of a nuclear reactor accident, state or local government authorities on the EAS would broadcast instructions/notifications to the public on conditions or protective actions.

Emergency Coordinator - A position title in NUREG 0654-Rev 1 corresponding to the Entergy position of Emergency Director.

Emergency Director - A previously designated and trained individual who assumes total responsibility for directing all licensee activities related to an emergency at the site. The Emergency Director is the interface between the Onsite Emergency Organization and all offsite agencies.

Emergency Notification System (ENS) - The NRC Emergency Notification System is a dedicated telephone system (part of the Federal Telephone System). It connects the plant with NRC headquarters in Bethesda, Maryland. It is used for reporting emergency conditions to NRC personnel.

Emergency Operations Facility - The facility for evaluating and coordinating all of Entergy activities related to an emergency.

Emergency Plan Administrative Procedures - Procedures that provide detailed information necessary to maintain the Emergency Planning Program. Primarily used by members of the Emergency Planning Staff.

Emergency Plan Implementing Procedures - Procedures that provide detailed information necessary to implement required tasks during an emergency. Primarily used by members of the Emergency Response Organization.

Indian Point Energy Center Emergency Plan

Appendix 4

Abbreviations, Acronyms and Definitions

Emergency Planning Manager - Individual responsible for reviewing and updating the emergency plan and supporting documents and coordinating all onsite and offsite emergency planning efforts.

Emergency Planning Zone (EPZ) - The area around the Indian Point Energy Center Site where planning is required for the plume exposure pathway, out to approximately 10-miles (10-mile EPZ). For the ingestion exposure pathway, the EPZ extends out to approximately 50-miles (50-mile EPZ). The 10-mile EPZ encompasses areas of Westchester, Rockland, Putnam and Orange Counties. The 50-mile EPZ includes the 10-mile EPZ and encompasses areas of Connecticut, New Jersey, Pennsylvania and New York.

Emergency Response Data System - ERDS is a direct near real-time electronic data link between the licensee's onsite computer system and the NRC Operations Center that provides for the automated transmission of a limited data set of selected parameters.

Essential Personnel - Those individuals needed to achieve the goals and tasks as deemed necessary by the Shift Manager, Emergency Director and/or Emergency Plant Manager during an emergency. Unless otherwise directed, initially all members of the Emergency Response Organization (ERO) are considered essential personnel.

Exclusion Area - The area surrounding the reactor in which licensee has authority to determine all activities including exclusion or removal of personnel and property from the area. (10CFR100)

Fission Product Barrier - The fuel cladding, reactor coolant system boundary, or the containment boundary.

Health Physics Network (HPN) - In the event of a site emergency, the NRC HPN line will be activated by the NRC Operations center in Bethesda, Maryland. This phone is part of a network that includes the NRC Regional Office and the NRC Operations Headquarters in Bethesda, Maryland. This system is dedicated for the transmittal of radiological information to the NRC Operations Headquarters in Bethesda, Maryland, and the NRC Regional Office. HPN phones are located in the TSC/OSC and EOF.

Indian Point Energy Center Site - The combined areas immediately surrounding Units 1, 2 and 3 that are owned and operated by Entergy.

Joint Information Center - Located outside the plume exposure emergency planning zone at the Hudson Valley Transportation Management Center, 200 Bradhurst Avenue, Hawthorne, NY. This facility provides for coordination of public information released to the news media and the public. It provides for a point-of-contact between Entergy and the news media.

Indian Point Energy Center Emergency Plan

Appendix 4

Abbreviations, Acronyms and Definitions

New York Emergency Operations Center – New York State has principal Emergency Operations Centers in the Public Security Building, in Harriman State Office Campus in Albany, New York and at the Hudson Valley Transportation Center in Hawthorne, New York. A third EOC is located in the Region III Emergency Management Office in Queensbury, New York.

Nuclear Facility Operator - The licensee (Entergy) who operates the nuclear power plants at the Indian Point Energy Center Site.

Offsite - Locations outside of the Indian Point Energy Center Site boundary.

Onsite - The area within the Indian Point Energy Center Site boundary.

Onsite Emergency Organization - The Indian Point Energy Center organization that has the capability to provide initial response to emergency situations

Operational – The emergency response facility has been activated and staffed, and has assumed responsibilities for performing its intended functions.

Operations Support Center - Located on the 53' elevation adjacent to the Technical Support Center, it houses all Operations, Instrument and Control, Maintenance, Chemistry and Radiation Protection personnel awaiting assignment by the Shift Manager/Plant Operations Manager. (NUREG 0654)

Plant Emergency Operating Procedures - Procedures located under separate cover from the Emergency Implementing Procedures that specify actions required to be performed by control room personnel to mitigate reactor coolant system or process system abnormalities.

Process Radiation Monitors - Radiation detectors which continuously monitor operating plant systems or specific effluent release points and provide the Control Room with remote monitoring capabilities and in some cases provide initiation of automatic termination of a specific effluent release.

Protective Actions - Those actions taken during or after an emergency for the purpose of reducing or eliminating hazards, or preventing or minimizing radiological exposures to persons that would likely occur if the actions were not taken. Protective actions would be warranted provided the reduction in an individual dose expected to be achieved by carrying out the protective actions is not offset by excessive risks to individual safety in taking the protection action.

Protective Action Guide (PAG) - Projected radiological dose values to individuals in the general population who warrant protective action. Protective Action Guides contain criteria used to determine whether the general population needs protective action regarding projected radiological doses, or from actual committed (measured) dose values.

Indian Point Energy Center Emergency Plan

Appendix 4

Abbreviations, Acronyms and Definitions

Protective Action Recommendations (PARs) - Recommended actions to the States and counties for the protection of the offsite public from whole body external gamma radiation, and inhalation and ingestion of radioactive materials. The State(s) assesses the PARs and may issue access control and other recommendations concerning the safeguards of affected food chain processes.

Protected Area - The area enclosed by the security fence immediately surrounding Units 1, 2 and 3 where access is restricted in accordance with the Security Plan.

Quarterly - Frequency of occurrence equal to once in each of the following periods: January 1st through March 31st, April 1st through June 30th, July 1st through September 30th, October 1st through December 31st.

Radiation Area - Any area, accessible to personnel, in which there exists radiation, originating in whole or in part within licensed material, at such levels that a major portion of the body could receive in any one hour a dose in excess of five millirem, or in any five consecutive days a dose in excess of one hundred millirem.

Radiologically Controlled Area - Any area within plant buildings or on plant property where access is restricted and monitored for the purpose of radiation protection.

Radiological Emergency Communication System - Dedicated private line telephone system connecting the licensee with NY State and the four County Warning Points and Emergency Operations Centers, and other agencies.

Recovery Actions - Those actions taken after the emergency to restore the plant as nearly as possible to its pre-emergency condition.

Recovery Center - The location from which the Recovery Manager will control the overall recovery effort.

Security Code Yellow - Indicates that a bomb threat has resulted in the discovery of a device; an unarmed individual has attempted to enter the site, or an unsuccessful sabotage. Personnel are restricted from using radios, cell phones or other electronic devices. Personnel may be directed to evacuate to their Assembly Area, or to respond to Emergency Response Facilities. All personnel are to remain in this position until an "all clear" or similar announcement is made over the plant page.

Security Code Orange - Indicates that a successful sabotage to the plant has occurred. Personnel may be directed to evacuate to their Assembly Area, or to respond to their Emergency Response Facility. Personnel are restricted from using radios, cell phones or other electronic devices. All personnel are to remain in this position until an "all clear" or similar announcement is made over the plant page.

Indian Point Energy Center Emergency Plan

Appendix 4

Abbreviations, Acronyms and Definitions

Security Code Red – Indicates that security officers are responding to a threat or an actual armed intruder. Personnel may be instructed to conceal themselves or to evacuate to their Assembly Area. Personnel are restricted from using radios, cell phones or other electronic devices. Personnel in office environments are to stay away from windows and keep concealed under their desks. Personnel in the field should find equipment or areas in which to conceal themselves. All personnel are to remain in this position until an “all clear” or similar announcement is made over the plant page.

Shift Manager - Management person in charge of plant operations during each shift. This person initially takes charge of the emergency response effort until arrival of the management persons who will relieve them of the emergency duties of Plant Operations Manager and Emergency Director

Site Boundary - That line beyond which the land is neither owned, leased, nor otherwise controlled by the site licensee (Technical Specifications). The site boundary for the purposes of the Emergency Plan coincides with the “exclusion area” boundary shown in the FSAR. (FSAR, Figure 2.2-2)

For Dose Assessment and Protective Actions Recommendation purposes the Site Boundary is the closest distance at which members of the public would be exposed to a radioactive release. When the plume is traveling toward the water, the distance to the nearest point on the opposite side of Hudson River will be considered as the Site Boundary.

Site Evacuation – Process of removing non-essential personnel from the Owner Controlled Area.

Site Recovery Director - The individual who reports to senior management of the Company and who directs the Corporate Response Organization during the recovery stage. The Site Recovery Director is responsible for the technical direction and control of the integrated recovery effort.

Staffed – The emergency response facility has been activated and sufficient personnel are available to perform the required functions as determined by the facility manager.

Station - The three Entergy Nuclear Generating Units (1, 2 and 3) located on the Indian Point Energy Center Site, near Peekskill, NY.

Technical Support Center – Located on the 53' elevation adjacent to the Operations Support Center, it is used by technical, engineering and operations personnel in their support of the watch personnel handling the in-plant accident conditions (NUREG 0654)

Technical Support Center Manager - The individual who directs and coordinates the technical support activities.

Indian Point Energy Center Emergency Plan

Appendix 4

Abbreviations, Acronyms and Definitions

Vital Area - Areas within the station security fence that contain vital equipment. Examples include Control Rooms, Containment and Electrical Equipment Rooms.

Warning Point - A location designated by a government agency for the purposes of receiving and promulgating warning information.

Watch - Positions covered by plant operating personnel on a 24-hour basis.

Indian Point Energy Center Emergency Plan

Appendix 5

EVACUATION PLANS

I. INTRODUCTION

Evacuation planning is based on the identification of both the population to be evacuated and the transportation resources required to accomplish the task. These are the essential data around which the Evacuation Time Estimate (ETE) is built. Because the population in the areas to be evacuated can vary with the time of day, the day of the week, the seasons and other factors, a set of fifteen temporal scenarios has been developed for use in the ETE. These scenarios, prepared for both fair and adverse weather conditions, address variations in the general population, employee population, transient population and special facility (e.g., schools, nursing homes, and hospitals) population, as well as variations in roadway conditions. The fifteen evacuation scenarios are:

Scenario	Season	Day of Week	Time of Day	Weather	Special
1	Summer	Midweek	Midday	Good	None
2	Summer	Midweek	Midday	Rain	None
3	Summer	Weekend	Midday	Good	None
4	Summer	Weekend	Midday	Rain	None
5	Summer	Midweek, Weekend	Evening	Good	None
6	Winter	Midweek	Midday	Good	None
7	Winter	Midweek	Midday	Rain	None
8	Winter	Midweek	Midday	Snow	None
9	Winter	Weekend	Midday	Good	None
10	Winter	Weekend	Midday	Rain	None
11	Winter	Weekend	Midday	Snow	None
12	Winter	Midweek, Weekend	Evening	Good	None
13	Winter	Weekend	Midday	Good	West Point Football
14	Summer	Weekend	Midday	Good	Event at Croton Point Park
15	Summer	Midweek	Midday	Good	Roadway impact Rt. 6; Rt. 9W; Palisades Pkwy; Taconic Pkwy

The traffic demand and trip-generation rate of evacuating vehicles were estimated from the gathered data. Sources of data include the 2010 Census, New York agencies, county agencies, a telephone survey and special concern facilities. (See Section 3/Appendix E and

Indian Point Energy Center Emergency Plan

Appendix 5

EVACUATION PLANS

Section 5/Appendix F of the ETE for a complete discussion of traffic demand and trip generation time, respectively.)

Following federal guidelines, the Indian Point Energy Center (IPEC) Emergency Planning Zone (EPZ) is subdivided into 38 Protective Action Areas. The Protective Action Area definitions are provided in Section II. The Protective Action Areas have been designed so that each can be defined in terms of well-known community names or boundaries. These Protective Action Areas are then grouped to conform with circular areas or "keyhole" configurations (circles plus radial sectors) that define Evacuation Regions for the ETE study. The Evacuation Regions are defined in Appendix H of the ETE Report. For each Protective Action Area within the EPZ, primary evacuation routes have been identified. Descriptions of the Protective Action Areas and their associated evacuation routes are given in the county plan procedures and in Section 10 and Appendix L of the ETE Report. Listings and maps of reception centers for each Protective Action Area are also included in the county procedures and in Section 10 of the ETE Report.

As part of the public education program associated with the implementation of the County Radiological Emergency Response Plan (RERP), the general public will be provided with materials to enable identification of their residential locations within a given Protective Action Area, thus identifying the recommended evacuation route and reception center as well.

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II. PROTECTIVE ACTION AREAS

The plume exposure EPZ for the IPEC has been subdivided into 38 discrete Protective Action Areas as shown in Figure 1. The 2010 US Census permanent resident population estimates for each of the Protective Action Areas are provided in Table 1. The boundaries of the various Protective Action Areas are described by county in Tables 2 through 5.

III. EVACUATION TIME ESTIMATES

Evacuation time estimates by Region for each of the scenarios are presented in Section 7 of the ETE Report. An overview of evacuation time estimates for 90% and 100% of the population within the Protective Action Areas included in the regions defined by the two-mile and five-mile rings and for the full EPZ are provided in Tables 6-A, 6-B and 6-C.

IV. DESCRIPTION OF THE EVACUATION PLAN

The evacuation plan comprises four major phases: mobilization, egress, maintenance and re-entry. As a Response Action, the first phase of evacuation--mobilization--may be initiated for an incident classified as an Alert, a Site Area Emergency or a General Emergency. The decision to proceed with the second phase of the plan--egress--will be made as the status of the incident is assessed. The final phases of the plan--maintenance and re-entry--are applicable only after an evacuation has occurred.

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TABLE 1

EPZ Permanent Population 2010 Census

Protective Action Area	Orange	Putnam	Rockland	Westchester
Briarcliff Manor				8,370
Central Town of Clarkstown			23,052	
Northeastern Town of Ramapo			25,941	
Northeastern & Eastern Town of Clarkstown			15,127	
Northwestern Town of Clarkstown			7,453	
Ossining				30,478
Village of Haverstraw			11,910	
New Castle (west of Hardscrabble Road)				4,686
Village of West Haverstraw			10,376	
Unincorporated Areas of the Town of West Haverstraw			11,483	
Town of Tuxedo east of NYS Thruway	204			
Village of Pomona			4,520	
Grassy Point			142	
Croton-on-Hudson				8,078
Stony Point			13,111	
Verplanck				2,183
Tompkins Cove			1,797	
Buchanan				2,232
Montrose				2,593
Jones Point			125	
Village of Harriman east of NYS Thruway	0			
Peekskill				23,565
Cortlandt				26,565
Bear Mountain State Park	16		5	
Harriman State Park	6		9	

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TABLE 1 (cont.)

EPZ Permanent Population
2010 Census¹

Protective Action Area	Orange	Putnam	Rockland	Westchester
Yorktown				36,275
Somers (west of Route 118)				4,436
Fort Montomery	1,837			
Southwest Carmel		2,597		
Village of Highland Falls	4,175			
Lower Philipstown		2,581		
Village of Woodbury (east	2,386			
West Point	6,464			
Southern Putnam Valley		10,171		
Town of Highlands	0			
Hudson River	Hudson River			
Town of Cornwall (south	1,035			
Southern Philipstown		4,569		
Total Population by County:	16,123	19,918	125,051	149,461
Total EPZ Population	310,553			

1. Indian Point Energy Center, Development of Evacuation Time Estimates, Addendum for Additional Regions (2-mile Radius + Downwind to EPZ Boundary), KLD Engineering P.C. KLD TR-557, Section 2, September 2, 2014

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Table 2. Orange County Protective Action Area Descriptions

Protective Action Area	Description
Town of Tuxedo east of NYS Thruway	The Town of Tuxedo east of the NYS Thruway from the Rockland County line to the Town of Woodbury town line (not in Harriman State Park).
Village of Harriman east of NYS Thruway	Village of Harriman east of NYS Thruway.
Fort Montgomery	The Hamlet of Fort Montgomery.
Village of Highland Falls	Village of Highland Falls.
Village of Woodbury east of NYS Thruway	The Village of Woodbury east of the NYS Thruway from the Town of Tuxedo to the Town of Cornwall.
West Point	The United States Military Academy (West Point)
Town of Highlands	The Town of Highlands excluding the Village of Highland Falls and the Hamlet of Fort Montgomery.
Town of Cornwall (south of Angola Road)	The Town of Cornwall from the Woodbury Town Line east of Route 32 and south of Angola Rd to Route 9W west of Route 9W to the Town of Highlands town line.
Bear Mountain State Park	The portion of Bear Mountain State Park in Orange County.
Harriman State Park	The portion of Harriman State Park in Orange County.

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Table 3. Putnam County Protective Action Area Descriptions

Protective Action Area	Description
Southwest Carmel	The southwestern corner of the Town of Carmel; that is, the portion south of Lake Secor Road (County Route 30), and west of State Route 6N, including the area known as Secor.
Lower Philipstown	The most southern part of the Town of Philipstown; that is, south of Canopus Hollow Road; Old West Point Road east, east of US Route Canopus Hollow Road; Old West Point Road east, east of US Route 9, south of State Route 403, Lower Station Road and a short line from Lower Station Road as it nears the river to the boat basin just south of Garrison. This part includes the area known as Continental Village.
Southern Putnam Valley	The southern portion of the Town of Putnam Valley; that is, the portion south of Clarence Fahnestock Memorial State Park and west of Sunken Mine Road, south of Northshore Road, west of Lake Road (County Route 20), south of Tinker Hill Road, Peekskill Hollow Road, Bryant Pond Road and Lake Secor Road. This portion includes the areas known as Gilbert Corners, Sunnybrook, Oscawana Corners, Crofts Corners, Adams Corners, and Lake Peekskill.
Southern Philipstown	The southern half of Philipstown, not including the area defined as Lower Philipstown; that is, the Village of Garrison and the Village of Nelsonville except for the portion of Hudson Highlands State Park, and the portion of Philipstown south of Moffett Road, Lane Gate Road, Old Albany Post Road, Indian Brook Road and south of Clarence Fahnestock Memorial State Park, and including the areas known as Nelson Corners, Garrison, Travis Corners, South Highland, Four Corners, and Forsonville.

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Table 4. Rockland County Protective Action Area Descriptions

Protective Action Area	Description
Central Town of Clarkstown	Central part of the Town of Clarkstown, bounded on the south by (west to east) West Clarkstown Road, a short segment of the Palisades Interstate Parkway (PIP), Church Road, Germonds Road, Parrott Road McCarthy Way, a short segment of Strawtown Road, and Hillcrest Road; on the east by the western edge of DeForest Lake; on the north by (east to west) Congers Road, Goebel Road northward, State Route 304, Squadron Boulevard, Main Street northward, West Phillips Hill Road, Old Phillips Hill Road, Buena Vista Road northward, and Conklin Road; and an eastern portion of the Town of Ramapo, east of the PIP and south of Conklin Road and a short section of State Route 45 connecting Conklin Road to the PIP.
Northeastern Town of Ramapo	The Town of Ramapo west of the Palisades Interstate Parkway and north of Viola and Eckerson Roads, including the Villages of Wesley Hills, New Hempstead and New Square and the Hamlet of Hillcrest.
Northeastern & Eastern Town of Clarkstown	Northeastern and Eastern-central parts of the Town of Clarkstown, excepting High Tor State Park, bounded on the south by Crusher and Christian Herald Roads and Nyack Beach State Park and on the west by Lake DeForest, including the Hamlets of Congers and Valley Cottage and Rockland Lake and Hook Mountain State Parks.
Northwestern Town of Clarkstown	Northwestern part of the Town of Clarkstown, excepting High Tor State Park, bounded on the east by the western boundary of Lake De Forest, and on the south by (east to west) Congers Road, Goebel Road northward, State Route 304, Squadron Boulevard, Main Street northward, West Phillips Hill Road, Old Phillips Hill Road, Buena Vista Road northward, and Conklin Road; and the northeastern part of the Town of Ramapo, bounded on the west by the Palisades Interstate Parkway, and on the south by Conklin Road and a short section of State Route 45.
Village of Haverstraw	In the Town of Haverstraw, the Village of Haverstraw.
Village of West Haverstraw	In the Town of Haverstraw, the Village of West Haverstraw.
Unincorporated Areas of the Town of Haverstraw	The unincorporated areas of the Town of Haverstraw including the Hamlets of Thiells and Mount Ivy.

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Table 4 Rockland County Protective Action Area Descriptions (continued)

Protective Action Area	Description
Village of Pomona	In the Towns of Haverstraw and Ramapo, the Village of Pomona and the unincorporated portions of the Hamlet of Pomona.
Grassy Point	Grassy Point east of the Penny Bridge, Minisceongo Yacht Club, Haverstraw Marina, Haverstraw Bay County Park, Bowline Park.
Stony Point	The Town of Stony Point east of Bear Mountain and Harriman State Parks, south of Tompkins Cove and west of Grassy Point.
Tompkins Cove	Tompkins Cove zip code area.
Jones Point	Eastern part of Bear Mountain State Park and the Jones Point and Dunderberg areas, south of Salisbury Meadow and Ring Meadow and east of U.S. Route 9W/202, and including the non-park areas east and south of Dunderberg Mountain, north of the main southern boundary of Bear Mountain State Park.
Bear Mountain State Park	The eastern part of Harriman State Park and Bear Mountain State Park, bounded on the west and north by the Palisades Interstate Parkway northbound and U.S. Route 6 to the Bear Mountain Bridge, and south of Salisbury Meadow and Ring Meadow, on the east by U.S. Route 9W/202 and the Park boundary, where the boundary is west of Route 9W/202.
Harriman State Park	The central and western parts of Harriman State Park, bounded on the east by the Palisades Interstate Parkway (PIP) northbound and a line connecting PIP/US. Route 6 to the West Point Military Reservation boundary where they are very close, about 1 1/2 miles W of the Bear Mountain Bridge; on the south by the Ramapo/Haverstraw Town Line and the Rockland/Orange County Line southwestward; and on the west by the New York State Thruway (Interstate Route 87/287, not included in the EPZ) and the NW/SE running utility right-of-way crossing Smith Rock and Pound Mountain.

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Table 5. Westchester County Protective Action Area Descriptions

Protective Action Area	Description
Briarcliff Manor	The Village of Briarcliff Manor.
Ossining	The Town and Village of Ossining.
Town of New Castle (west of Hardscrabble Rd)	The Town of New Castle west of Hardscrabble Road.
Croton-on-Hudson	The Village of Croton-on-Hudson.
Verplanck	The Hamlet of Verplanck.
Buchanan	The Village of Buchanan.
Montrose	The Hamlet of Montrose.
Peekskill	The City of Peekskill.
Cortlandt	The Town of Cortlandt excluding the Hamlets of Verplanck and Montrose, and the Villages of Buchanan and Croton-on-Hudson; including Camp Smith and the FDR VA Hospital.
Yorktown	The Town of Yorktown.
Somers (west of Route 118)	The Town of Somers west of State Route 118/Tomahawk Street.

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Table 6-A. Evacuation Time Estimates for the 2-Mile Region, 5-Mile Region and Full EPZ – Summer Scenarios

Scenario:	Summer									
	Midweek				Weekend				Midweek, Weekend	
	1		2		3		4		5	
	Midday				Midday				Evening	
Region	Good Weather		Rain		Good Weather		Rain		Good Weather	
	90%	100%	90%	100%	90%	100%	90%	100%	90%	100%
	R1 (2 Mile)	2:25	5:20	2:25	5:20	2:10	5:15	2:15	5:15	2:10
R2 (5 Mile)	3:05	5:20	3:20	5:20	3:10	5:20	3:20	5:20	2:40	5:20
R3 (Full EPZ)	3:55	6:55	4:10	7:10	3:35	6:10	3:45	6:10	3:15	5:55

Table 6-B. Evacuation Time Estimates for the 2-Mile Region, 5-Mile Region and Full EPZ – Winter Scenarios

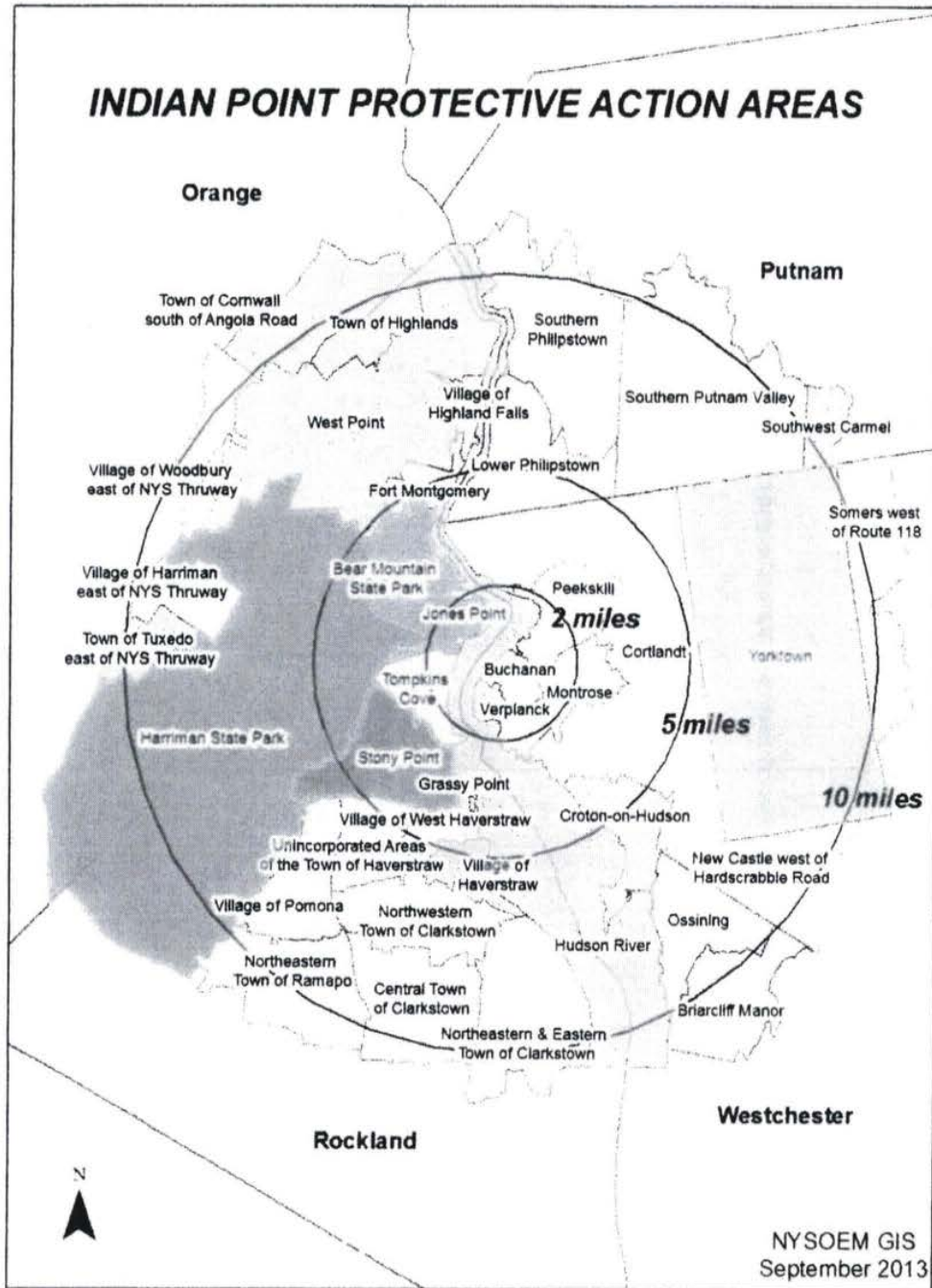
Scenario:	Winter													
	Midweek						Weekend						Midweek, Weekend	
	6		7		8		9		10		11		12	
	Midday						Midday						Evening	
Region	Good Weather		Rain		Snow		Good Weather		Rain		Snow		Good Weather	
	90%	100%	90%	100%	90%	100%	90%	100%	90%	100%	90%	100%	90%	100%
	R1 (2 Mile)	2:25	5:20	2:25	5:20	3:15	6:20	2:10	5:15	2:10	5:15	3:00	6:15	2:10
R2 (5 Mile)	3:05	5:20	3:25	5:20	3:50	6:25	2:40	5:20	2:50	5:20	3:25	6:20	2:40	5:20
R3 (Full EPZ)	3:55	6:45	4:20	6:55	4:55	7:50	3:20	5:55	3:35	6:05	4:10	6:25	3:15	5:55

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Table 6-C. Evacuation Time Estimates for the 2-Mile Region, 5-Mile Region and Full EPZ – Special Events

	Winter		Summer			
	Weekend		Weekend		Midweek	
Scenario:	13		14		15	
Region	Midday		Midday		Midday	
	Good Weather		Good Weather		Good Weather	
	West Point Football		Croton Point Park Event		Roadway Impact	
	90%	100%	90%	100%	90%	100%
R1 (2 Mile)	2:10	5:15	2:10	5:15	2:25	5:20
R2 (5 Mile)	2:45	5:20	3:05	5:20	3:05	5:20
R3 (Full EPZ)	3:30	5:55	3:35	6:10	4:40	7:00

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 FIGURE 1



EMERGENCY PLANNING PROTECTIVE ACTION AREAS