

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Cynthia R. Hafenstine
Manager Regulatory Affairs

January 14, 2016

RA 16-0004

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Subject: Docket No. 50-482: Revision of a Procedure and a Form that Implement the Radiological Emergency Response Plan (RERP) for Wolf Creek Generating Station (WCGS)

Gentlemen:

One revised procedure and one revised form that implement the WCGS RERP are enclosed for your information. The revised procedure and the revised form are identified below:

Procedure
EPP 06-023, Rev. 3

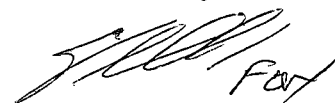
Effective Date
December 16, 2015

Form
EPF 06-023-01, Rev. 3

Effective Date
December 16, 2015

The attached summary of the changes to the implementing procedure and to the implementing form explains that these changes do not reduce the effectiveness of the WCGS RERP. This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4204.

Sincerely,



Cynthia R. Hafenstine

CRH/rlt

Attachment: Summary of Changes to One Procedure and One Form That Implement the Wolf Creek Generating Station (WCGS) Radiological Emergency Response Plan (RERP)

Enclosures

cc: M. L. Dapas (NRC), w/a, w/e (2)
C. F. Lyon (NRC), w/a, w/e
N. H. Taylor (NRC), w/a, w/e
Senior Emergency Preparedness Inspector (NRC), w/a, w/e
Senior Resident Inspector (NRC), w/a, w/e

AX45
NRR

**Summary of Changes to One Procedure and One Form
That Implement the Wolf Creek Generating Station (WCGS)
Radiological Emergency Response Plan (RERP)**

1. Procedure EPP 06-023, "Emergency Response Facility Functionality," Rev. 3

New step 3.1.8 added a reference to Nuclear Energy Institute (NEI) 13-01, "Reportable Action Levels for Loss of Emergency Preparedness Capabilities," which has been endorsed by the Nuclear Regulatory Commission (NRC) in Supplement 1 to NUREG-1022, "Event Reporting Guidelines: 10 CFR 50.72 and 50.73," Revision 3. Steps 4.1.1, 4.8, 4.8.1, 4.9, 4.9.1, 4.10 and 4.10.1 incorporate definitions in accordance with NEI 13-01.

NEI 13-01 provides specific guidance for reporting under 10 CFR50.72(b)(3)(xiii) and the guidance in NEI 13-01 provides an acceptable alternative to guidance found in section 3.2.13 of NUREG-1022, Revision 3. Therefore, the changes to procedure EPP 06-023 do not reduce the effectiveness of the WCGS RERP.

2. Form EPF 06-023-01, "Emergency Response Facility Functionality Evaluation," Rev. 3

The headings for section 4 and section 5 in "General Information" have been changed to align with guidance, respectively, in table B1 and table B2 of NEI 13-01. Guidance for maintaining functionality of electrical power sources at the Emergency Operations Facility (EOF) by referring to procedure EPP 06-003, "Emergency Operations Facility Operations," has been added to the second bulleted item in step B.1 of "Electrical Power Sources."

Specific temperature ranges have been added to steps E.4 and E.5 in "Compensatory measures to restore functionality" to define when emergency response facilities should be declared degraded but functional or non-functional. Compensatory measures have also been added to steps E.4 and E.5. New step E.3 has been added to "Additional action requirements" to provide guidance for monitoring weather conditions and conducting additional functionality evaluations.

Form EPF 06-023-01 was revised in accordance with NEI 13-01, which provides an acceptable alternative to guidance found in section 3.2.13 of NUREG-1022, Revision 3. Therefore, the changes to form EPF 06-023-01 do not reduce the effectiveness of the WCGS RERP.



EPP 06-023

EMERGENCY RESPONSE FACILITY FUNCTIONALITY

Responsible Manager

Superintendent Emergency Planning

Revision Number	3
Use Category	Information
Administrative Controls Procedure	No
Management Oversight Evolution	No
Program Number	06

DC65 12/16/2015

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1.0 PURPOSE

1.1 This procedure provides guidance for evaluating the functionality of an Emergency Response Facility (ERF). This procedure directs the user to evaluate the reportability of ERF issues.

2.0 SCOPE

2.1 This procedure applies to the Technical Support Center (TSC) and Emergency Operations Facility (EOF), including the Alternate TSC/OSC but does NOT apply to non-owned emergency response facilities such as the Topeka Joint Information Clearinghouse (JIC).

2.2 Operability/Functionality determination for plant equipment that supports the Emergency Action Levels (EALs) is outside of the scope of this procedure.

2.3 Review of scheduled work in an ERF and any work that could affect other equipment important to emergency response is addressed in AP 22A-001, SCREENING, PRIORITIZATION AND PRE-APPROVAL and AP 06-004, EQUIPMENT IMPORTANT TO EMERGENCY RESPONSE. This review is outside the scope of this procedure.

3.0 REFERENCES AND COMMITMENTS

3.1 References

- 3.1.1 10 CFR 50.72, Immediate Notification Requirements for Operating Nuclear Reactors
- 3.1.2 10 CFR 50.73, License Event Report System
- 3.1.3 NUREG-0696, Functional Criteria for Emergency Response Facilities
- 3.1.4 INPO 10-007, Equipment Important to Emergency Response
- 3.1.5 AP 06-002, Radiological Emergency Response Plan (RERP)
- 3.1.6 AP 26A-001, Reportable Events - Evaluation and Documentation
- 3.1.7 AP 06-004, Equipment Important to Emergency Response
- 3.1.8 NEI 13-01, Reportable Action Levels for Loss of Emergency Preparedness Capabilities

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3.2 Commitments

3.2.1 None

4.0 **DEFINITIONS**

4.1 Compensatory Measure

4.1.1 A temporary means, established as part of a planned activity, to perform a given emergency response function during a period when the normally used methods are unavailable such that, when implemented, there is a reasonable expectation that the function would be accomplished during an actual emergency, albeit in a possibly degraded manner. A COMPENSATORY MEASURE need not meet the same design or operating requirements as the normally used methods but must be sufficient to support effective implementation of the site emergency plan.

4.2 Degraded

4.2.1 The ERF may have components or equipment whose functional capability is reduced, but the overall ERF can still function and is capable of conducting emergency response activities as designed.

4.3 Emergency Response Facility (ERF)

4.3.1 Facilities, buildings and structures necessary to implement the station emergency response plan.

4.4 Evaluator

4.4.1 The evaluator is any individual who is knowledgeable of ERF functionality requirements and who detects a possible deficiency in the functionality of an ERF.

4.5 Functional

4.5.1 The ERF components and equipment are in working order and the ERF is capable of conducting emergency response activities as designed.

4.6 Non-Functional

4.6.1 The ERF components and equipment are in such a condition that the ERF is not capable of fulfilling its emergency response function.

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4.7 Reviewer

4.7.1 The reviewer is the Shift Manager or designee or the Superintendent Emergency Planning or designee who is knowledgeable in ERF functionality requirements. The reviewer provides an independent assessment of the information provided by the evaluator. The reviewer and evaluator shall not be the same person.

4.8 Alternate Facility (ALTERNATE FACILITY)

4.8.1 A temporary location that may serve as a Technical Support Center (TSC) or Emergency Operations Facility (EOF) in support of a planned work activity. An acceptable ALTERNATE FACILITY must have sufficient capability to support effective direction and control of an emergency response; however, it need not meet the same design or operating requirements applied to a normally used ERF.

4.9 Backup Emergency Response Facility (BACKUP ERF)

4.9.1 A facility that may serve as the TSC or EOF in the event that the primary facility is unavailable, as described in the station emergency response plan or a procedure described in the emergency response plan. An acceptable BACKUP ERF must meet the requirements and be functionally equivalent to the primary facility.

4.10 Viable Compensatory Measure

4.10.1 A compensatory measure that (1) can restore a required function in a reasonably comparable manner, and (2) is proceduralized prior to an event. Proceduralized means that the necessary instructions to perform a function exist in a document, procedure, user aid or standing order that will be followed by response personnel should an emergency occur. A VIABLE COMPENSATORY MEASURE does not include reliance upon "skill-of-the-craft" or individual judgment.

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5.0 RESPONSIBILITIES

5.1 Superintendent Emergency Planning

5.1.1 Maintain oversight and readiness of the ERFs.

5.2 Emergency Planning Staff Members

5.2.1 Ensure appropriate corrective actions are initiated to address degraded or non-functional components and equipment in the ERFs.

5.2.2 Provide input to evaluators, reviewers and other plant personnel regarding the functionality of components and equipment in the ERFs.

5.2.3 Communicate ERF functionality issues to the Emergency Response Organization (ERO) and other station personnel as necessary.

5.3 Evaluator

5.3.1 Evaluate the capability of an ERF to perform its emergency response function as designed.

5.3.2 Notify the Shift Manager or designee that a reportability evaluation should be performed for ERF functions determined to be degraded or non-functional.

5.4 Reviewer

5.4.1 Perform an independent assessment of an ERF Functionality Evaluation.

5.4.2 Notify the Shift Manager or designee that a reportability evaluation should be performed for ERF functions determined to be degraded or non-functional.

5.5 Shift Manager or Designee

5.5.1 Ensure that appropriate actions, including tracking and compensatory measures are initiated to address degraded or non-functional components and equipment in the ERFs in accordance with AP 06-004, EQUIPMENT IMPORTANT TO EMERGENCY RESPONSE.

5.5.2 Notify Call Superintendent and Emergency Planning of ERF functionality issues.

5.5.3 Perform reportability evaluations for ERF functions that are determined to be degraded or non-functional.

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6.0 PRECAUTIONS/LIMITATIONS

- 6.1 Operability/Functionality determination for plant equipment that supports the Emergency Action Levels (EALs) is outside of the scope of this procedure.
- 6.2 Actions taken to return degraded or non-functional ERF components and equipment to full service are commensurate with the significance of the associated emergency response function.

7.0 PROCEDURE

7.1 ERF Functionality Evaluation Process

7.1.1 Evaluator /Reviewer

1. **Evaluator:** Initiate the ERF functionality assessment using EPF 06-023-01, EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION to document the capability of the ERF to perform its emergency response function as designed.
2. **Reviewer:** Perform an independent assessment of the ERF functionality details and conclusions.
3. **IF** the EPF 06-023-01, EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION conclusion indicates that any area or the entire ERF is degraded or non-functional,
THEN perform the following:
 - o **Evaluator or Reviewer:** Notify the Shift Manager or designee to implement appropriate compensatory measures.
 - o **Evaluator or Reviewer:** Notify the Shift Manager or designee to consider reportability in accordance with AP 26A-001, REPORTABLE EVENTS - EVALUATION AND DOCUMENTATION.
4. **Reviewer:** Ensure completed EPF 06-023-01, EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION and associated documentation is forwarded to Emergency Planning.

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7.1.2 Shift Manager or Designee

1. **IF** the EPF 06-023-01, EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION conclusion indicates that any area or the entire ERF is degraded or non-functional,
THEN perform the following:
 - o Implement and document compensatory measures for non-functional components and equipment that support the ERFs in accordance with AP 06-004, EQUIPMENT IMPORTANT TO EMERGENCY RESPONSE.
 - o Perform a reportability evaluation in accordance with AP 26A-001, REPORTABLE EVENTS - EVALUATION AND DOCUMENTATION.
 - o Notify Call Superintendent and the Superintendent Emergency Planning or designee who is knowledgeable in ERF functionality requirements.

7.2.2 Superintendent Emergency Planning

1. **IF** the EPF 06-023-01, EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION conclusion indicates that any area or the entire ERF is degraded or non-functional,
THEN perform the following:
 - o Provide support to the Shift Manager or designee as required.
 - o Contact the Emergency Planning staff to assist with necessary actions.

7.2.3 Emergency Planning Staff

1. Ensure compensatory measures are in place.
2. Ensure corrective actions are initiated on a condition report, service request or other established work process for degraded or non-functional ERF components and equipment.

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3. Communicate ERF functionality issues and any associated compensatory measures to the appropriate Emergency Response Organization (ERO) members as necessary.
 - o Send an e-mail or other reliable notification explaining the ERF's condition AND any compensatory measures required if activation is required.
4. Communicate equipment or ERF restoration status to the appropriate ERO members.

8.0 RECORDS

- 8.1 The completed EPF 06-023-01, EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION forms shall be retained in the Emergency Planning files for two years.

9.0 FORMS

- 9.1 EPF 06-023-01, EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION

- END -

EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION

This form is used for making evaluations regarding the ability of an Emergency Response Facility (ERF) to perform its design functions to support AP 06-002, RADIOLOGICAL EMERGENCY RESPONSE PLAN (RERP).

Facility: TSC EOF Date: _____ Time: _____

Reason for Evaluation:

A. GENERAL INFORMATION

1. **IF** an ERF is evaluated as Degraded or Non-Functional in any Section B-E, **THEN** inform the Shift Manager that a reportability evaluation should be performed in accordance with AP 26A-001, REPORTABLE EVENTS – EVALUATION AND DOCUMENTATION.
2. **IF** one or more criteria listed in Sections B-E of this form are determined to be Degraded or Non-Functional, **THEN** the entire ERF shall be declared either Degraded or Non-Functional.
3. AP 06-004, Equipment Important to Emergency Response, ATTACHMENT A, Emergency Response Facility Compensatory Measures, provides the equipment category and restoration guidance.

EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION**4. Reportability - UNPLANNED Loss of Emergency Response Facilities and Equipment**

- a. Loss of a structure or equipment that would prevent the performance of EMERGENCY ASSESSMENT if an emergency were to occur.

AND

- b. The capability to perform EMERGENCY ASSESSMENT was not restored to service within the facility's activation times per the site emergency plan.

- * Activation times for **NORMAL** working hours, Monday-Thursday, 0700 to 1700:
TSC – 30 Minutes
EOF – 90 Minutes

OR

- * Activation times for **NON-NORMAL** working hours, ALL time periods outside of normal work hours including weekends, off Fridays, Company observed holidays and other Company-observed time off such as the Monday before a Tuesday holiday or a Thursday after a Wednesday holiday is:

TSC – 75 Minutes
EOF – 90 Minutes

AND

- c. The lost EMERGENCY ASSESSMENT capability cannot be performed at an BACKUP EMERGENCY RESPONSE FACILITY.

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EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION**A. GENERAL INFORMATION (Cont'd)****5. Reportability – PLANNED Loss of Emergency Response Facilities and Equipment**

- a. Loss of a structure or equipment, for greater than 24 hours, which would prevent the performance of EMERGENCY ASSESSMENT if an emergency were to occur.

AND

- b. **ANY** of the following:

1. (a) The capability to perform EMERGENCY ASSESSMENT cannot be restored to service within the facility's activation times per the site emergency plan.

- * Activation times for **NORMAL** working hours, Monday-Thursday, 0700 to 1700:

TSC – 30 Minutes

EOF – 90 Minutes

OR

- * Activation times for **NON-NORMAL** working hours, ALL time periods outside of normal work hours including weekends, off Fridays, Company observed holidays and other Company-observed time off such as the Monday before a Tuesday holiday or a Thursday after a Wednesday holiday is:

TSC – 75 Minutes

EOF – 90 Minutes

AND

- (b) No VIABLE COMPENSATORY MEASURE is in place.

AND

- (c) The lost EMERGENCY ASSESSMENT capability cannot be performed at ALTERNATE FACILITY.

OR

2. The lost structure or equipment is not expected to be restored within 72 hours from the start of the outage.

OR

3. The lost structure or equipment is not restored within 72 hours from the start of the outage.

AND

- c. The lost EMERGENCY ASSESSMENT capability cannot be performed at a BACKUP EMERGENCY RESPONSE FACILITY.

EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION

Evaluation Details:

CAP/WO/Service Request Numbers: _____

ERF is fully Functional? YES NO

ERF Degraded but Functional? YES NO

Evaluator Signature	Print Name	Date	Time
Reviewer Signature	Print Name	Date	Time

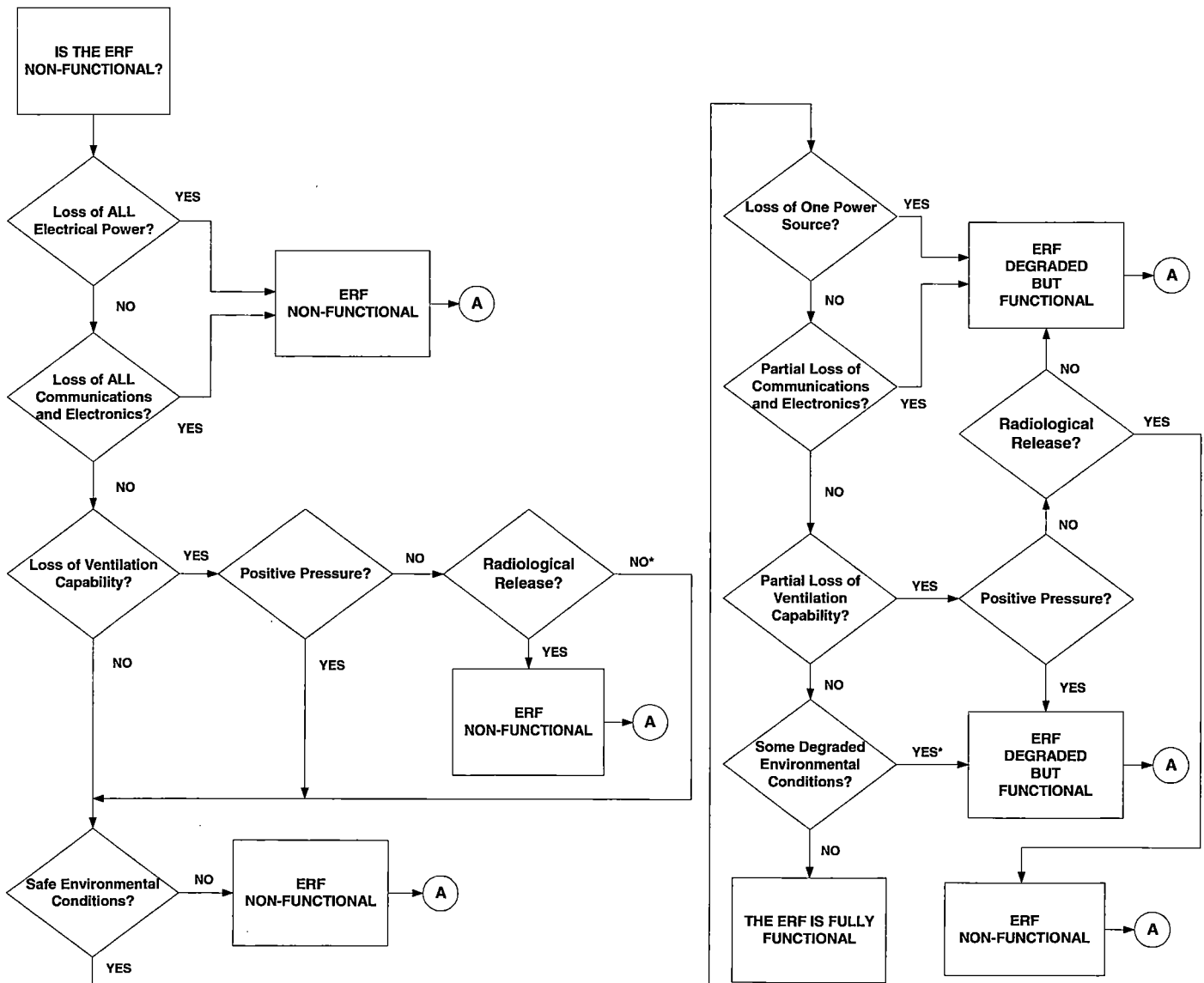
Forward completed form and associated documentation to Emergency Planning (DE-EP).

EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION

A. EMERGENCY RESPONSE FACILITY FUNCTIONALITY FLOWCHART

**IS THE ERF
NON-FUNCTIONAL?**

- Flowchart entry** - The following steps will be used to determine if the emergency response facility ERF) is non-functional due to:
- Loss of Electrical Power
 - Loss of ALL Communications and Electronics
 - Loss of Ventilation
 - Unsafe Environmental Conditions



(*) Re-evaluate functionality as radiological and/or environmental conditions warrant.

→ (A) Notify the Shift Manager to evaluate for reportability per AP 26A-001, REPORTABLE EVENTS – EVALUATION AND DOCUMENTATION

EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION

<p>B. ELECTRICAL POWER SOURCES</p>	<p><u>Required for Full Functionality:</u></p> <ul style="list-style-type: none"> ○ Normal power is available to the facility ○ An Alternate power source is available to the facility ○ No electrical safety issues to personnel in the facility <p><u>Compensatory measures to restore functionality:</u></p> <p>1) <u>IF</u> Normal or Alternate power is available, <u>THEN</u> functionality is maintained.</p> <ul style="list-style-type: none"> ○ TSC: Refer to EPF 06-002-05, TSC DIESEL OPERATIONS. ○ EOF: Refer to EPP 06-003, EMERGENCY OPERATIONS FACILITY OPERATIONS. <p><u>Additional action requirements:</u></p> <p>1) <u>IF</u> Normal power is lost and diesel generator is supplying power, <u>THEN</u> monitor fuel levels periodically.</p>
<div style="border: 1px solid black; width: 100px; height: 100px; margin: 0 auto; transform: rotate(45deg); display: flex; align-items: center; justify-content: center;"> <p>Loss of ALL Electrical Power?</p> </div>	<p>Loss of ALL electrical power? YES <input type="checkbox"/> NO <input type="checkbox"/></p> <p><u>IF ALL</u> electrical power is lost, <u>THEN</u> declare the ERF Non-Functional.</p>
<div style="border: 1px solid black; width: 150px; height: 80px; margin: 0 auto; display: flex; align-items: center; justify-content: center;"> <p>ERF NON-FUNCTIONAL</p> </div>	<p><u>IF</u> the ERF is determined to be Non-Functional due loss of all electrical power, <u>THEN</u> notify the Shift Manager to evaluate for reportability in accordance with AP 26A-001, REPORTABLE EVENTS – EVALUATION AND DOCUMENTATION.</p>
<div style="border: 1px solid black; width: 100px; height: 100px; margin: 0 auto; transform: rotate(45deg); display: flex; align-items: center; justify-content: center;"> <p>Loss of One Power Source?</p> </div>	<p>Normal or Alternate Power available? YES <input type="checkbox"/> NO <input type="checkbox"/></p> <p><u>IF</u> one source of electrical power is lost, <u>THEN</u> declare the ERF Degraded but Functional.</p>
<div style="border: 1px solid black; width: 150px; height: 80px; margin: 0 auto; display: flex; align-items: center; justify-content: center;"> <p>ERF DEGRADED BUT FUNCTIONAL</p> </div>	<p><u>IF</u> the ERF is determined to be Degraded but Functional due to the loss of one source of electrical power, <u>THEN</u> notify the Shift Manager to evaluate for reportability in accordance with AP 26A-001, REPORTABLE EVENTS – EVALUATION AND DOCUMENTATION.</p>

EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION

C. COMMUNICATIONS AND ELECTRONICS

Required for Full Functionality:

- Plant computer (NPIS) available to support assessment of plant conditions and dose projections. **Minimum of one NPIS computer required – TSC only.**
- Corporate PC (R*TIME Data Viewer) available to support assessment of plant conditions and dose projections. **Minimum of one R*TIME Data Viewer computer required – EOF only.**
- Corporate PC available for performing dose assessment function. **Minimum of one Corporate PC required.**
- Voice communications to on-site and off-site personnel and agencies.
- The ability to make Notifications in accordance with EPP 06-007.
- Dedicated line for Emergency Notification Network (ENS) – **TSC only**
- Dedicated line for Health Physics Network (HPN) - **EOF only**
- Emergency Response Data Systems (ERDS) server is active. Control Room may be contacted to confirm ERDS capability.

Compensatory measures to restore functionality:

- 1) **IF** the WCNOC Local Area Network (LAN) is unavailable, **THEN** dose assessment data may be performed using dose assessment (EDCP) backup software locally on the computer. Functionality is maintained.
- 2) **IF** Met Tower data is unavailable, **THEN** the Coffey County Airport and National Weather Service are the backup method for obtaining meteorological data.
- 3) **IF** commercial phone lines are unavailable, **THEN** radios or satellite phones are used as backup means for Notifications. Functionality is maintained.
- 4) **IF** dedicated lines for HPN or ENS are unavailable, **THEN** commercial phones lines may be used for communication. Functionality is maintained.
- 5) **IF** ERDS is unavailable, **THEN** ENS communications are the backup method.

Additional action requirements:

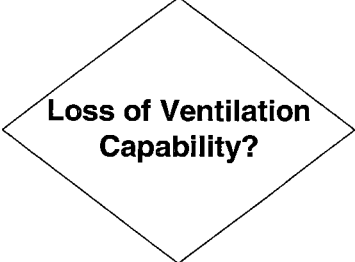

- 1) **IF** any major loss of communications capability, even if the function is still available, **THEN** notify the Shift Manager to consider reportability in accordance with AP 26A-001, REPORTABLE EVENTS – EVALUATION AND DOCUMENTATION.

EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION


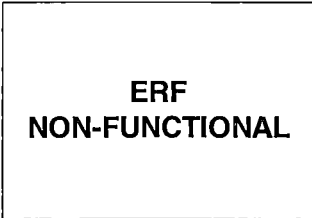
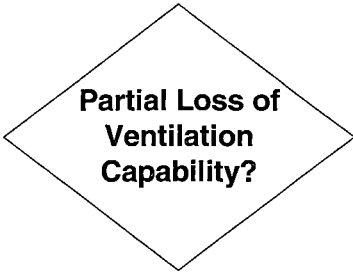
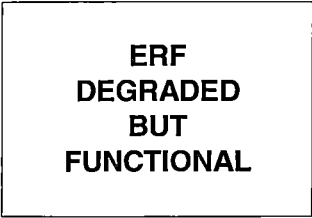
C. COMMUNICATIONS AND ELECTRONICS (Cont'd)

<p style="text-align: center;">Loss of ALL Communications and Electronics?</p>	<p>Loss of ALL communications and electronics?</p> <p style="text-align: right;">YES <input type="checkbox"/> NO <input type="checkbox"/></p> <p>IF ALL communications and electronics are lost, THEN declare the ERF non-functional.</p>
<p style="text-align: center;">ERF NON-FUNCTIONAL</p>	<p>IF the ERF is determined to be Non-Functional due loss of ALL communications and electronics, THEN notify the Shift Manager to evaluate for reportability in accordance with AP 26A-001, REPORTABLE EVENTS – EVALUATION AND DOCUMENTATION.</p>
<p style="text-align: center;">Partial Loss of Communications and Electronics?</p>	<p>Partial loss of communications and electronics?</p> <p style="text-align: right;">YES <input type="checkbox"/> NO <input type="checkbox"/></p> <p>IF the ERF has experienced a partial loss of communications and electronics, THEN declare the ERF Degraded but Functional.</p>
<p style="text-align: center;">ERF DEGRADED BUT FUNCTIONAL</p>	<p>IF the ERF is determined to be Degraded but Functional due to a partial loss of ALL communications and electronics, THEN notify the Shift Manager to evaluate for reportability in accordance with AP 26A-001, REPORTABLE EVENTS – EVALUATION AND DOCUMENTATION.</p>

EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION

<p>D. VENTILATION</p>	<p><u>Required for Full Functionality:</u></p> <ul style="list-style-type: none"> ○ Ventilation operates in Normal mode. ○ Ventilation operates and maintains positive pressure in the Filter mode – TSC only. <p><u>Compensatory measures to restore functionality:</u></p> <ol style="list-style-type: none"> 1) <u>IF</u> dampers are found out of position, <u>THEN</u> this does <u>not</u> indicate loss of functionality unless the dampers cannot be manipulated to maintain the required positive pressure. <ul style="list-style-type: none"> ○ TSC: Refer to EPF 06-002-06, TSC HEPA FILTRATION AND IODINE MONITOR OPERATIONS 2) <u>IF</u> the ventilation system cannot maintain positive facility pressure, <u>THEN</u> functionality is maintained <u>until such time that radiological conditions require positive pressure</u>. <p><u>Additional action requirements:</u></p> <ol style="list-style-type: none"> 1) Ventilation may not be functional on loss of certain fans that would prevent the capability of filtering and maintaining positive pressure. 2) For ventilation problems where functionality is in question, contact the system engineer for evaluation assistance.
<p style="text-align: center;">  </p>	<p>Ventilation operates and maintains positive facility pressure in Filter mode?</p> <p style="text-align: right;"> YES <input type="checkbox"/> NO <input type="checkbox"/> </p>
<p style="text-align: center;">  </p>	<p><u>IF</u> a positive pressure can be maintained, <u>THEN</u> evaluate for Safe Environmental Conditions.</p> <p style="text-align: center;"><u>OR</u></p> <p><u>IF</u> a positive pressure cannot be maintained, <u>THEN</u> determine if a radiological release is in progress.</p>

EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION

D. VENTILATION (Cont'd)	
 <p style="text-align: center;">Radiological Release?</p>	<p>Radiological Release in progress? YES <input type="checkbox"/> NO* <input type="checkbox"/></p> <p>IF a radiological release greater than normal operating limits is in progress</p> <p style="text-align: center;">AND</p> <p>Positive pressure cannot be maintained in the ERF</p> <p style="text-align: center;">THEN</p> <p>Declare the ERF Non-Functional.</p> <p>(* Re-evaluate functionality as radiological and/or environmental conditions warrant.</p>
 <p style="text-align: center;">ERF NON-FUNCTIONAL</p>	<p>IF the ERF is determined to be Non-Functional due to the inability to maintain a positive pressure with a radiological release in progress, THEN notify the Shift Manager to evaluate for reportability in accordance with AP 26A-001, REPORTABLE EVENTS – EVALUATION AND DOCUMENTATION.</p>
 <p style="text-align: center;">Partial Loss of Ventilation Capability?</p>	<p>IF the facility has experienced a partial loss of ventilation</p> <p style="text-align: center;">AND</p> <p>The ventilation operates and maintains a positive pressure,</p> <p style="text-align: center;">OR</p> <p>A positive pressure cannot be maintained, but there is NO radiological release in progress*,</p> <p style="text-align: center;">THEN</p> <p>declare the ERF Degraded but Functional if safe environmental conditions exist.*</p> <p>(* Re-evaluate functionality as radiological and/or environmental conditions warrant.</p>
 <p style="text-align: center;">ERF DEGRADED BUT FUNCTIONAL</p>	<p>IF the ERF is determined to be Degraded but Functional due to a partial loss of ventilation capability, THEN notify the Shift Manager to evaluate for reportability in accordance with AP 26A-001, REPORTABLE EVENTS – EVALUATION AND DOCUMENTATION.</p>

EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION

E. ENVIRONMENTAL CONDITIONS	<p><u>Required for Full Functionality:</u></p> <ul style="list-style-type: none"> ○ The structure is safe for occupation. ○ Building temperature can be maintained within a range of 55-90°F. ○ Lighting is sufficient to conduct business in a safe manner. ○ Potable water is available. ○ Bathroom facilities are available <p><u>Compensatory measures to restore functionality:</u></p> <p>1) <u>IF</u> installed lighting is insufficient or failed, <u>THEN</u> use temporary lighting.</p> <p>2) <u>IF</u> normal potable water is unavailable, <u>THEN</u> use temporary water supplies (bottled/other).</p> <p>3) <u>IF</u> permanent restrooms are unavailable, <u>THEN</u> use portable bathroom facilities.</p> <p>4) Building temperature, <u>cooling</u> required: <u>IF</u> cooling can be maintained within a range of 91-100°F, <u>THEN</u> declare the ERF Degraded but Functional. Use fans, portable air conditioning or open doors as appropriate to maintain a comfortable environment.</p> <p><u>IF</u> building temperature is greater than 100°F, <u>THEN</u> declare the ERF Non-Functional. Use the ALTERNATE FACILITY or BACKUP ERF.</p> <p>5) Building temperature, <u>heating</u> required: <u>IF</u> heating can be maintained within a range of 45-54°F, <u>THEN</u> declare the ERF Degraded but Functional. Use portable heaters as appropriate to maintain a comfortable environment.</p> <p><u>IF</u> building temperature is less than 45°F, <u>THEN</u> declare the ERF Non-Functional. Use the ALTERNATE FACILITY or BACKUP ERF.</p> <p><u>Additional action requirements:</u></p> <ol style="list-style-type: none"> 1) For out-of-service potable water or bathroom facilities, functionality is maintained, but put compensatory measures in place within four hours for personnel comfort and hygiene. 2) Re-evaluate the use of portable bathroom facilities if a radiological release above normal operating limits has occurred or is likely. Discuss with Radiation Protection. 3) Monitor the extended weather forecast for changing conditions that could impact building temperatures. Re-evaluate functionality as appropriate. 4) Compensatory actions should not be used for extended periods of time. <u>IF</u> their use will exceed seven (7) days, <u>THEN</u> re-evaluate functionality.
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EMERGENCY RESPONSE FACILITY FUNCTIONALITY EVALUATION

E. ENVIRONMENTAL CONDITIONS (Cont'd)	
<p>Safe Environmental Conditions?</p>	<p>Do safe environmental conditions exist in the ERF?</p> <p style="text-align: right;">YES <input type="checkbox"/> NO <input type="checkbox"/></p> <p>IF safe environmental conditions do not exist, THEN declare the ERF Non-Functional.</p>
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> <p>ERF NON-FUNCTIONAL</p> </div>	<p>IF the ERF is determined to be Non-Functional due to the inability to maintain safe environmental conditions, THEN notify the Shift Manager to evaluate for reportability in accordance with AP 26A-001, REPORTABLE EVENTS – EVALUATION AND DOCUMENTATION.</p>
<p>Some Degraded Environmental Conditions?</p>	<p>Are some environmental conditions of the ERF Degraded?</p> <p style="text-align: right;">YES <input type="checkbox"/> NO <input type="checkbox"/></p> <p>Are environmental conditions sufficient to conduct business in a safe manner?</p> <p style="text-align: right;">YES <input type="checkbox"/> NO <input type="checkbox"/></p> <p>IF some environmental conditions are degraded AND environmental conditions are sufficient to conduct business in a safe manner, THEN declare the ERF Degraded but Functional.* (*) Re-evaluate functionality as environmental conditions warrant.</p>
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> <p>ERF DEGRADED BUT FUNCTIONAL</p> </div>	<p>IF the ERF is determined to be Degraded but Functional due to degraded environmental conditions, THEN notify the Shift Manager to evaluate for reportability in accordance with AP 26A-001, REPORTABLE EVENTS – EVALUATION AND DOCUMENTATION.</p>