

U.S. GEOLOGICAL SURVEY
RESEARCH REACTOR
LICENSE NO. R-113
DOCKET NO. 50-274

EMERGENCY PLAN
REVISION 14

REDACTED VERSION*

SECURITY-RELATED INFORMATION REMOVED

*REDACTED TEXT AND FIGURES BLACKED OUT OR DENOTED BY BRACKETS



Department of the Interior
US Geological Survey
Box 25046 MS-974
Denver CO, 80225

May 30, 2014

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

Sirs:

Enclosed is proposed Revision 14 of the Emergency Plan for the U.S. Geological Survey TRIGA Reactor (GSTR) Facility (License R-113, Docket 50-274). The individual change is detailed and discussed on the following page of this letter. The changed section is marked with a vertical line in the margin on page 9 of the Emergency Plan.

This change was reviewed by the facility's Reactor Operations Committee. The committee's evaluation was that the change is appropriate and should be submitted to the NRC for approval. Please contact me at (303) 236-4726 if you have any questions regarding the revision or need further details.

Sincerely,

A handwritten signature in black ink that reads "Tim DeBey". The signature is written in a cursive, flowing style.

Tim DeBey

USGS Reactor Supervisor

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 5/30/14

Attachment

Copy to:
Vito Nuccio, Reactor Administrator, MS 911
USGS Reactor Operations Committee

A020
AX45
NRR

DETAILS OF PROPOSED REVISION

Title Page: the revision number and date were changed on the title page.

Page 9, ¶ 4.2.1.5. This sentence used to state, "Continuous air monitor reading exceeds 10K cpm above background from radionuclides being released from the reactor.", It is proposed that it be changed to state, "DAC level in the reactor bay from radionuclides being released from the reactor exceeds 100 (using the sum of DAC levels of all identified radionuclides)."

BASIS: In Section 4.2.1 of the current GSTR Emergency Plan, criteria that constitute an Unusual Event are defined, including Item 4.2.1.5 which specifies that a Continuous Air Monitor (CAM) reading exceeding 10K cpm above background, from the reactor, would constitute an Unusual Event.

A phone conference was held with the NRC on 4/17/14 regarding the GSTR relicensing effort, and specifically the GSTR Emergency Plan. As a result of that meeting, it was proposed to revise item 4.2.1.5 to make it related more to the actual radiological threat instead of a reading from an integrating detector that is very poorly related to actual radiological threat. The GSTR CAM is an integrating detector since the filters are fixed and normally changed only once a week. This means that a very low concentration of airborne radionuclides ($\ll 1$ DAC) can cause a CAM alarm of 10 K cpm as the particles build up on the filters.

The proposed change specifies that an airborne radioactivity level in the reactor bay of >100 DAC would be an Unusual Event, using the unity rule for calculating the total DAC value. A person staying in an area with a DAC value of 100 for one hour would receive a TEDE of 250 mRem from the airborne radionuclides. This is 8% of a radiological worker's annual limit and it is very conservative because the reactor bay would not actually be occupied for more than a minute or two during a high airborne release into the room. A two minute occupation at 100 DAC would give a TEDE of 8.3 mRem. This DAC limit is reasonable for an emergency declaration based on airborne contamination in a controlled access area.

There was concern about our ability to assess the DAC level in a reasonable time frame, but the GSTR staff has a reasonable and quick sampling method, along with multiple, calibrated gamma spectrometers available to perform the DAC evaluations and calculations quickly (~10 minutes). This time frame is actually less than required for other emergency declaration criteria.

If the proposed change to the Emergency Plan is approved, we will change the Emergency Procedures that specify that a DAC determination be performed if a CAM alarm is actuated. The CAM alarm will still be the initiating event, but it will initiate a DAC determination instead of initiating the declaration of a facility emergency.

EMERGENCY PLAN

FOR THE

U.S. GEOLOGICAL SURVEY

TRIGA REACTOR FACILITY

Approved:


Reactor Supervisor

Revision No. 14

DATE: May 2014

1. Introduction

The United States Geological Survey (USGS) research reactor facility (GSTR) consists of a TRIGA Mark I, 1000 KW reactor. The GSTR is a light water cooled, graphite reflected, reactor utilizing standard TRIGA U-ZrH fuel moderator elements. The reactor is operated by the U.S. Geological Survey, Department of the Interior, under License R-113. The reactor is installed in the Nuclear Science Building (Building 15) in the Denver Federal Center, Lakewood, Jefferson County, Colorado. Within the city of Lakewood, the Federal Center is 7 miles southwest of the central Denver business area, 3 miles west of the Denver city limits, and about 6 miles southeast of Golden, Colorado (Figure 1). No residences are within the Federal Center boundaries.

The Nuclear Science Building is occupied by professional and technical personnel, most of whom have experience in handling, using, and measuring radioactive material, and authorized to do so by NRC licenses held by the Geological Survey.

The reactor is an integral part of the research effort of the Department of the Interior, U.S. Geological Survey, in their basic studies to improve methods and techniques to enhance scientific knowledge about water and earth materials. The GSTR is operated on a one shift, 40 hour/week basis. The annual thermal power generation is approximately 1000 MWH.

The purpose of this Plan is to identify radiological emergencies applicable to the GSTR and describe the measures to be taken to minimize the consequences of such emergencies.

2. Definitions

Assembly Area. The grass strip on the southeast side of the Building 15 parking lot.

Emergency. A condition which calls for immediate action, beyond the scope of normal operating procedures, to avoid an accident or to mitigate the consequences of one.

Emergency action levels. Specific instrument readings, or observation; radiological dose or dose rates; or specific contamination levels of airborne, waterborne, or surface-deposited radioactive materials that may be used as thresholds for establishing emergency classes and initiating appropriate emergency measures.

Emergency classes. Emergency classes are classes of accidents grouped by severity level for which predetermined emergency measures should be taken or considered.

Emergency plan. An emergency plan is a document that provides the basis for actions to cope with an emergency. It outlines the objectives to be met by the emergency procedures and defines the authority and responsibilities to achieve such objectives.

Emergency procedures. Emergency procedures are documented instructions that detail the implementation actions and methods required to achieve the objectives of the emergency plan.

Offsite. The geographical area that is beyond the site boundary.

Onsite. The geographical area that is within the site boundary.

Operations boundary. That portion of the reactor facility designated as the "Protected Area". (Figure 3)

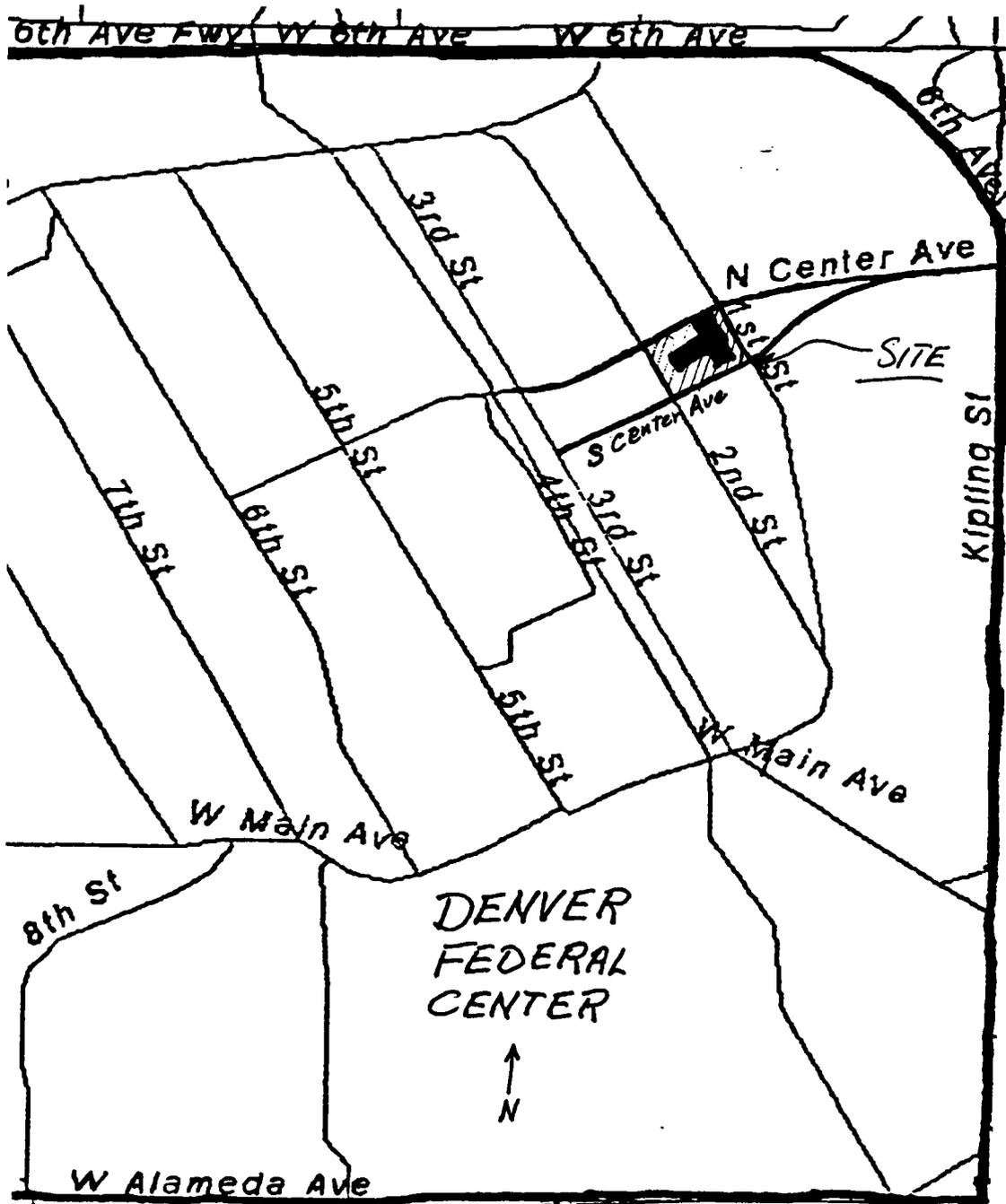


Figure 2. Site Boundary

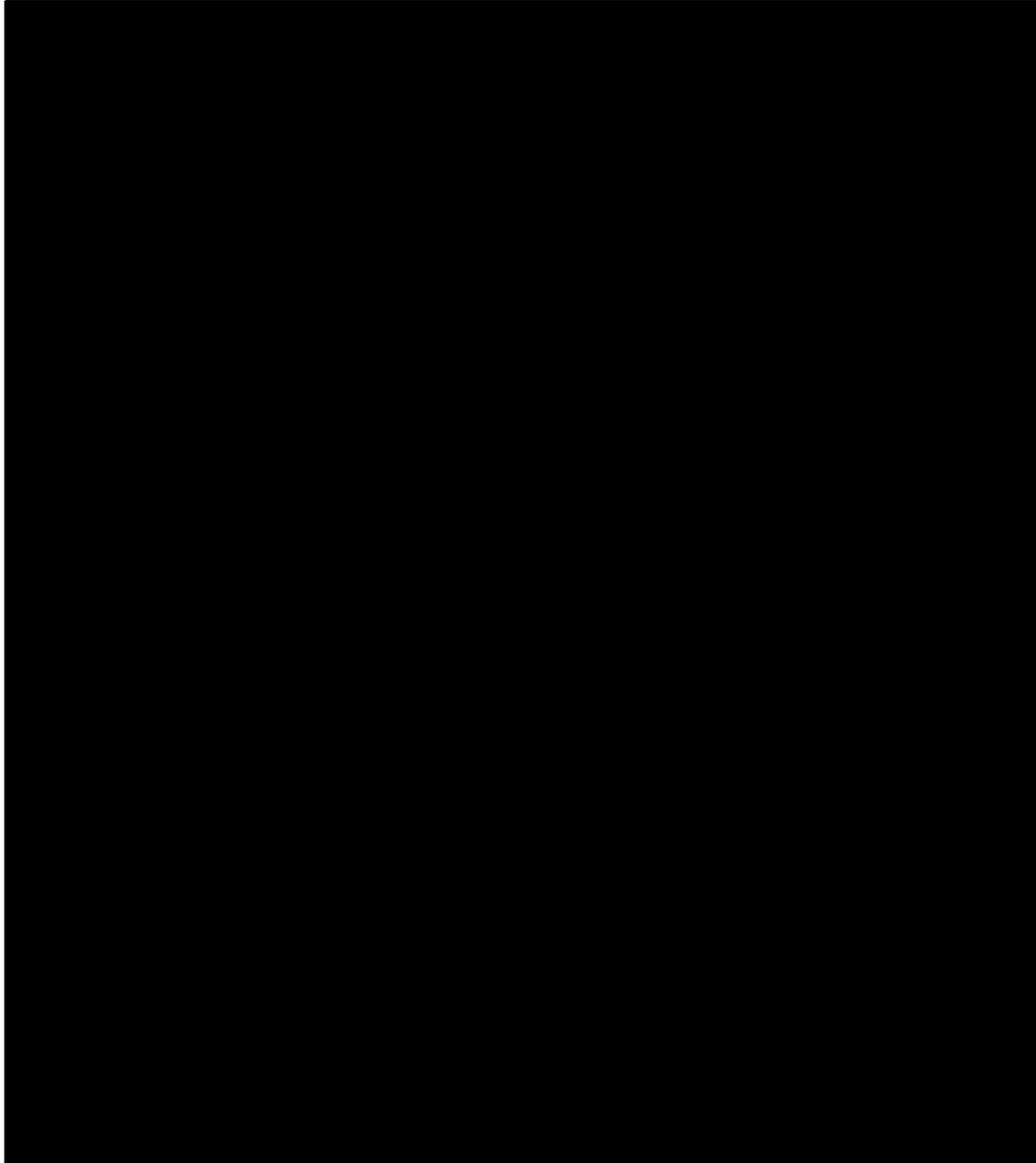


Figure 3. US Geological Survey TRIGA Reactor Facility - Protected Area

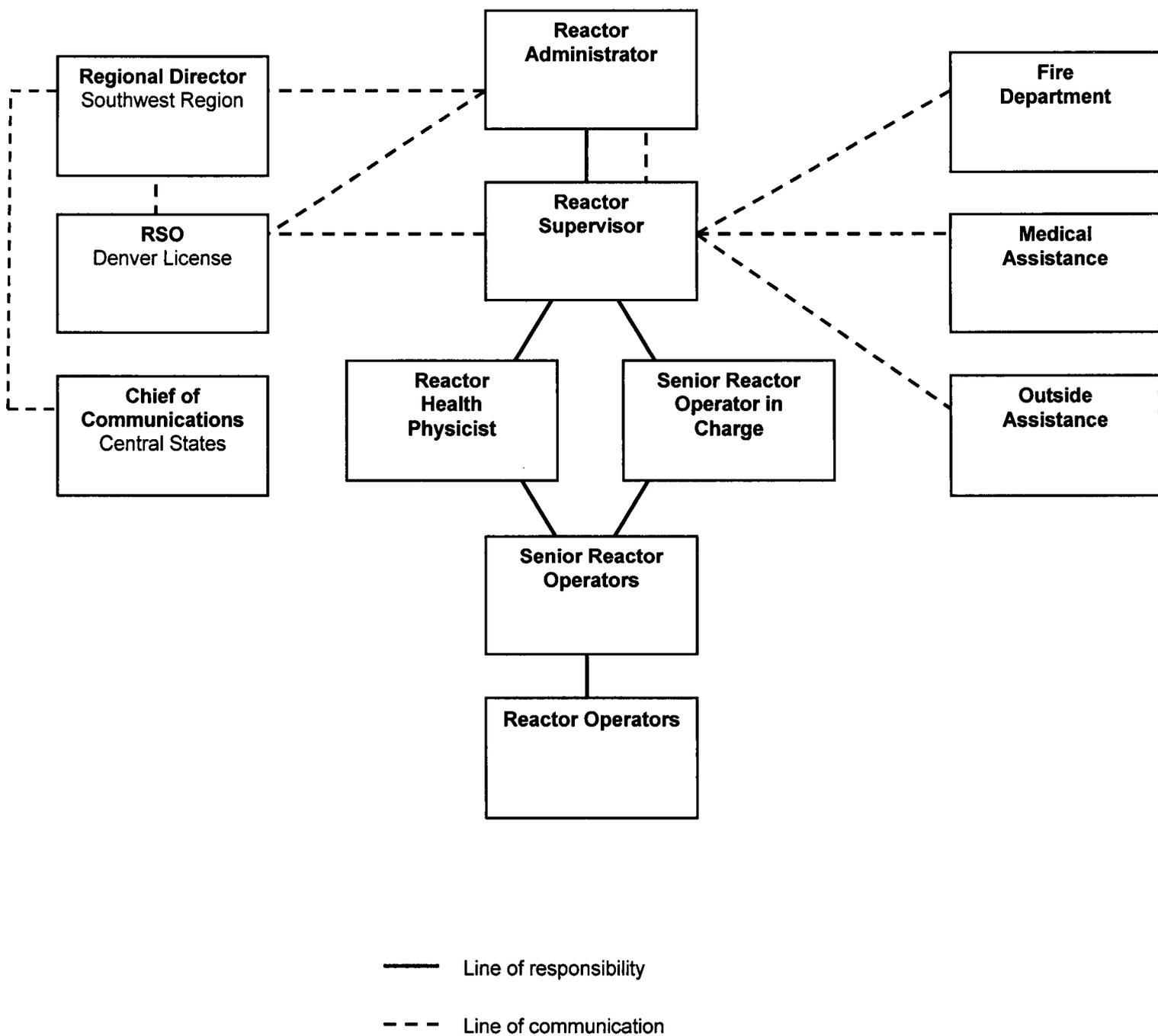


Figure 4 GSTR Facility Emergency Organization

Protective action guides (PAG). Projected radiological dose or dose commitment values to individuals that warrant protective action following a release of radioactive material. Protective actions would be warranted provided the reduction in individual dose expected to be achieved by carrying out the protective action is not offset by excessive risks to individual safety in taking the protective action. The projected dose does not include the dose that has unavoidably occurred prior to the assessment.

Reactor facility. All areas which contain reactor physical plant or reactor offices.

Research reactor. A device to support a self-sustaining neutron chain reaction for research, developmental, education, training, or experimental purposes, and which may have provisions for production of nonfissile radioisotopes.

Site boundary. The site boundary is that area within the Denver Federal Center bounded on the north by North Center Avenue, on the east by First Street, on the south by South Center Avenue, and on the west by Second Street. The Nuclear Science Building (Building 15) is the only structure within that area. (Figure 2)

Shall, should, and may. The word "shall" is used to denote a requirement; the word "should" to denote a recommendation; and the word "may" to denote permission, neither a requirement nor a recommendation.

3. Organization and Responsibilities

3.1 Geological Survey

The Regional Director, Southwest Region, Geological Survey, Denver, Colorado, is responsible for the Occupant Emergency Plan for the protection, preparedness and control in emergency situations in buildings at the Denver Federal Center where the Geological Survey is the prime tenant agency.

The Chief of Communications, Central States is responsible for relaying information about the emergency situation to the news media and the public.

3.1.1 Reactor Facility

3.1.1.1 Reactor Administrator

The Reactor Administrator will be informed of any emergency condition in the Reactor Facility. The Administrator will provide the Regional Director's Office with current information on the status of the emergency.

3.1.1.2 Reactor Supervisor

The Reactor Supervisor or, if absent, the Senior Reactor Operator-in-Charge is responsible for dealing with any emergency condition that arises at the facility, including personnel (both Geological Survey and outside personnel) who subsequently arrive at the facility to assist in controlling an emergency. (see Figure 4)

Transfers of responsibility during emergency conditions at the facility will be made only when a senior person actually arrives on the

scene and personally informs the individual in charge that he is assuming responsibility.

The individual in charge will be responsible for notification of the Nuclear Regulatory Commission, if required. This individual will also notify the Regional Director, Southwest Region of any conditions that might affect any personnel outside the Nuclear Science Building and will request assistance from support organizations, if required.

Protective action decisions will be made by the individual in charge, in consultation with the Health Physicist.

The Reactor Supervisor is responsible for emergency preparedness planning for the GSTR facility, including updating of emergency plans and procedures and coordinating plans with other organizations. The Supervisor is also responsible for coordinating the activities of radiological assistance teams.

Termination of an emergency will be ordered by the Reactor Supervisor, or the Senior Reactor Operator-in-Charge, and this individual will be in charge of recovery operations.

Authorization of volunteer emergency workers to incur radiation exposures in excess of normal occupational limits will be made by the Reactor Supervisor or the Senior Operator-in-Charge, in consultation with the Health Physicist.

3.1.1.3 Reactor Health Physicist

The Reactor Health Physicist, or if absent, the Radiation Safety Officer, Denver License, will be in charge of radiological assessments, including onsite and offsite dose assessments. Protective actions will be recommended to the Reactor Supervisor.

3.1.2 Augmentation of Facility Emergency Organization

3.1.2.1 Fire Protection

Fire protection is provided by the Fire Department. The stations are manned on a 24-hour basis.

An automatic sprinkler system is installed in Building 15 with the exception of Room 149, [REDACTED]. Smoke detectors are also employed in the reactor facility to provide an early warning of fire conditions.

3.1.2.2 Medical Facilities

Initial treatment of injured personnel that does not involve radioactive contamination is the responsibility of the Fire Department. The decision to transfer victims to area hospitals would be made by the ambulance team under the direction of emergency room personnel at a local hospital.

3.1.2.3 Security

Security and traffic control for the Denver Federal Center is provided by the Federal Protective Service (FPS). There is no automatic response by the Federal Protective Service in the event of a radiological

emergency unless a [REDACTED] alarm is actuated. Assistance may be requested by the person in charge based on an evaluation of the particular circumstances.

3.1.2.4 Other Personnel

Laboratory personnel who are licensed to handle radioactive materials have received basic instructions in radiation monitoring and decontamination procedures. These personnel could be used to augment the radiation monitoring teams and assist in the recovery activities if the situation exceeded the capabilities of the reactor staff.

3.2 Support Organizations

3.2.1 Medical Assistance

Injured personnel who are contaminated with radioactive materials shall be transported to St Anthony Hospital, Lakewood, Colorado, for treatment under an agreement with that organization. An emergency call list for St Anthony Hospital is maintained in the Reactor Facility.

Transportation of contaminated personnel to St Anthony Hospital is the responsibility of the Fire Department and/or reactor staff.

3.2.2 Radiological Control Assistance

Under an agreement with the Department of Energy, the DOE Region 6 Radiological Assistance Program (RAP) coordinating office will furnish radiological control assistance in the event of an emergency beyond the capability of the reactor staff.

The DOE RAP teams are prepared to provide Health Physics personnel and a mobile unit containing survey instruments and other radioactive control supplies.

4. Classification of Emergencies

4.1 Unusual Event and Alert

4.2 Emergency Action Levels

4.2.1 Unusual Event

4.2.1.1 Sustained fire at the facility that does not involve reactor controls or radioactive materials.

4.2.1.2 Report or observation of severe natural phenomenon that are imminent or existing, e.g., (1) earthquakes that could adversely affect reactor safety systems, (2) flooding of Room 149, or (3) tornado winds that could strike the facility.

4.2.1.3 Security breaches or threats, like bomb threats or civil disturbances aimed toward the reactor facility.

4.2.1.4 Actual or projected radiological effluent at the site boundary calculated to produce a dose of 15 mrem whole body accumulated in 24 hours. The following guideline should be used to calculate the effluent dose:

24 hr dose (mrem) = $\sum_{t=0 \text{ to } 24} (C_t/EC)t / 160$ for non-noble gas nuclides,
and

24 hr dose (mrem) = $\sum_{t=0 \text{ to } 24} (C_t/EC)t / 80$ for noble gas nuclides.

where C_t is the isotope concentration at time t ,
EC is the value from 10 CFR 20 Appx B, Table 2, and
 t is the time in hours that the concentration exists.

4.2.1.5 DAC level in the reactor bay from radionuclides being released from the reactor exceeds 100 (using the sum of DAC levels of all identified radionuclides).

4.2.2 Alert

4.2.2.1 Fire or explosion that damages reactor controls or releases radioactive materials to the environment.

4.2.2.2 Actual or projected radiological effluent at the site boundary calculated to produce a dose of 75 mrem whole body accumulated in 24 hours. The following guideline should be used to calculate the effluent dose:

24 hr dose (mrem) = $\sum_{t=0 \text{ to } 24} (C_t/EC)t / 160$ for non-noble gas nuclides
and

24 hr dose (mrem) = $\sum_{t=0 \text{ to } 24} (C_t/EC)t / 80$ for noble gas nuclides,

where C_t is the isotope concentration at time t ,
EC is the value from 10 CFR 20 Appx B, Table 2, and
 t is the time in hours that the concentration exists.

4.2.2.3 Radiation levels at the site boundary exceeding 20 mrem/hr (whole body) for one hour.

4.2.2.4 Severe failure of fuel cladding or fueled experiments resulting in reactor room fission product activity of 1×10^{-6} uCi/ml or greater.

4.3 Emergency Planning Zone

The EPZ shall be the area within the operation's boundary.

4.4 Emergency Response

4.4.1 Communications

Primary communication will be by telephone or intercom. An evacuation horn, located in the reactor room, can be manually activated from the reactor console or from within the reactor room. Other evacuation horns are located at several points in the building, and these horns are activated automatically by the fire alarms or a high radiation alarm from the reactor facility.

There is a radiation alarm system connected directly to the FPS and is activated automatically in the event of radiation levels exceeding preset alarm points.

Fire Department and FPS units are equipped with 2-way radios and will provide a communication link in the event the telephone system is unavailable.

4.4.2 Activation of Emergency Organization

The Reactor Supervisor, or the Senior Operator-in-Charge, will be responsible for activation of those portions of the emergency organization required for the class of emergency existing. Emergency notification lists are posted within the operation's boundary and at several other locations on site. Notification lists are also available at the FPS control center.

The person in charge is also responsible for asking for radiological control assistance from the DOE contractor or for medical treatment of contaminated personnel at St Anthony Lakewood Hospital. The NRC will be notified of the occurrence of alert conditions at the facility.

4.4.3 Assessment Actions

Assessment of the emergency situation would be a continuing process based on visual observations and information from reactor instrumentation; remote readout from radiological monitoring instruments; and portable radiation monitoring instruments.

Multichannel analyzer systems are available on site for use in the identification of radionuclides. Alpha and beta counting systems are available on site to evaluate air samples and contamination wipes.

4.4.4 Corrective Actions

The declaration of any class of emergency shall be cause for the shutdown of the reactor. Reactor staff members will take corrective actions that will limit or reduce the release of radioactive materials and confine physical damage to as small an area as possible. Corrective action may include local fire suppression, securing of the ventilation system, or other damage control actions.

Certain members of the reactor staff have received first aid training and would render assistance to injured personnel until the arrival of the medical personnel.

4.4.5 Protective Actions

4.4.5.1 Personnel that are not needed for immediate corrective action will be evacuated from the area involved in the emergency. Evacuation routes have been established for Building 15 (Figure 5), and these instructions are posted at several locations in the building.

The parking lot on the south side of Building 15 has been designated as the primary assembly area. An alternate assembly area will be

designated by the Reactor Supervisor or designee if wind conditions or other considerations dictate.

4.4.5.2 Monitors are assigned responsibility for specific areas of the building. The monitors will assure that all personnel are evacuated from their assigned area. Visitors to the reactor area are escorted by reactor staff members.

Personnel who may have been contaminated will be monitored before being allowed to depart the assembly area. Fixed and portable radiation monitors are available to determine contamination of individuals and allow their movements to be restricted. Contaminated areas will be restricted to personnel as rapidly as the emergency situation allows.

4.4.5.3 Personnel entering the area to remove injured persons should be limited to an exposure of 25 rem to the whole body. Personnel engaged in corrective actions, including volunteers, should be limited to 5 rem. First-aid, ambulance, and/or medical personnel should also be limited to 5 rem. Protective clothing are available to emergency personnel.

The above guidelines would be implemented under the direction of the Reactor Health Physicist or the senior reactor staff member present. In all cases, the exposure should be kept as low as reasonably achievable.

4.4.5.4 Building walls and ropes will be the principal means of isolation and control of areas to minimize exposures and the spread of radioactive contamination. The FPS will assist in traffic and crowd control.

4.4.5.5 Radiation dose rates will be measured by both fixed area monitors and portable survey instruments capable of detecting neutron, gamma, beta and alpha radiation. Contamination will be monitored with hand and foot monitor (if available), sensitive survey instruments, and the use of swipes.

Information and data will be transmitted from Health Physics personnel to the senior reactor staff member in charge by messenger or telephone.

4.5 Emergency Facilities and Equipment

4.5.1 Emergency Support Center

The primary emergency support center will be located in the reactor facility office area. Secondary support centers will be located in the Nuclear Science Building or the assembly area if the building is evacuated.

4.5.2 Assessment Facilities

Fixed gamma area monitors are mounted throughout the reactor facility and the Nuclear Science Building. A fixed neutron monitor is located in the reactor room. Remote readouts of the monitors are provided in the reactor office area, and, in addition, remote readout of those monitors in the reactor room is provided at the reactor control console.

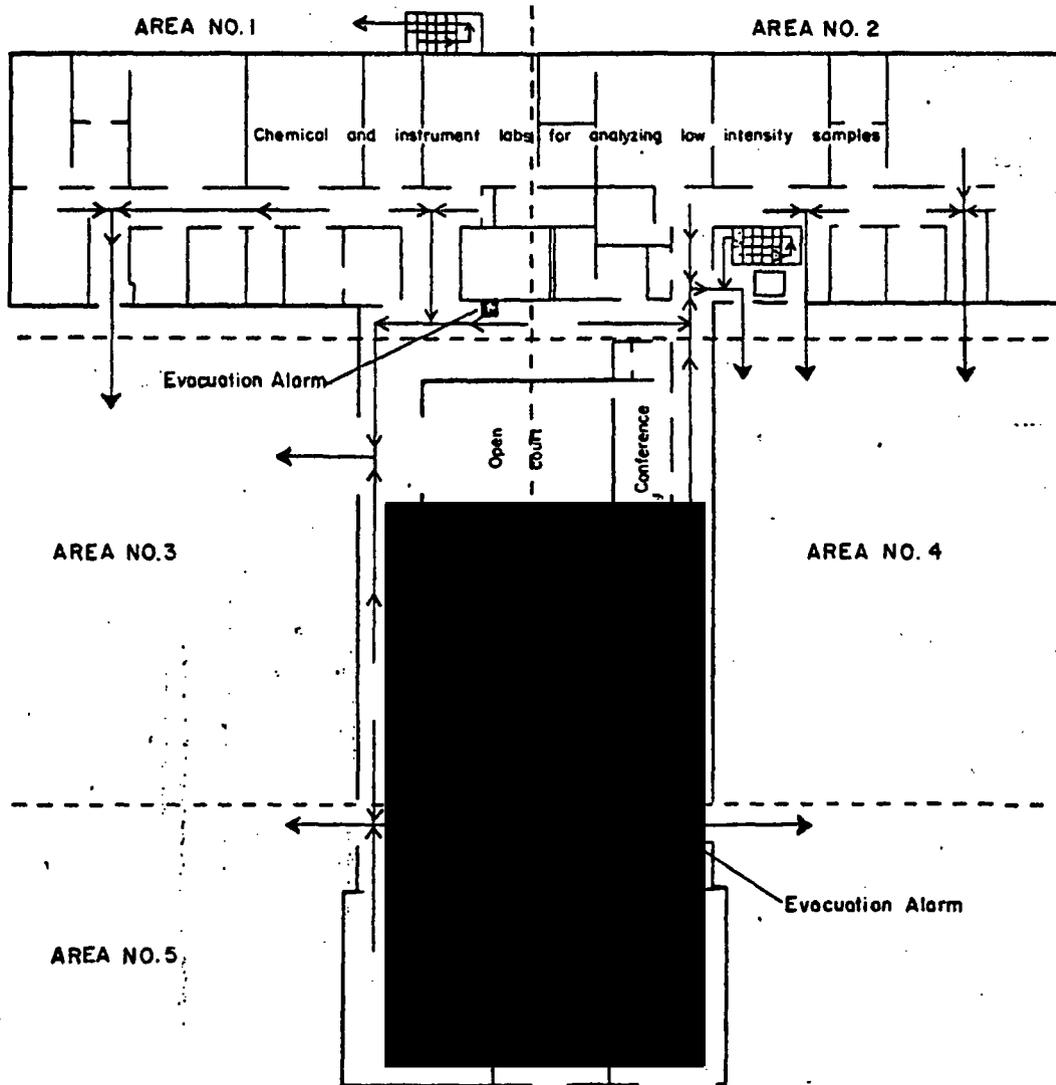


Figure 5. Evacuation routes

A hand and foot monitor is also located in the reactor facility.

4.5.2.1 Radiological Monitors

Portable survey meters capable of measuring alpha, beta, gamma, and neutron radiation are available at the reactor facility. Other portable monitors are also available from the Geological Survey's Radiation Safety Officer, Denver License.

A fixed air sampling device is mounted in the emergency exhaust stack to sample air from the exit side of the HEPA filter. A portable air sampler is available for sampling the air at other locations on or off site.

4.5.2.2 Facilities for Radionuclide Identification

Multichannel analyzer systems are available on site for specific radionuclide identification.

4.5.2.3 Nonradiological Monitors or Indicators

Reactor instrumentation and ventilation system instrumentation provide readouts that may be used to assess certain conditions in the reactor room.

4.5.2.4 Fire Detection Devices

An automatic sprinkler system is located throughout the Nuclear Science Building, with the exception of the [REDACTED] room. Smoke detectors are located in the reactor office area and in the reactor control console area.

4.5.3 First Aid and Medical Facilities

4.5.3.1 Decontamination

Facilities for decontamination of uninjured personnel are available in the Nuclear Science Building. Decontamination of personnel and/or equipment will be under the direction of the Reactor Health Physicist. Injured personnel who are contaminated will, if feasible, be wrapped in plastic to limit the spread of contamination during transfer to the hospital.

4.5.3.2 First Aid

Certain members of the reactor staff have received first aid training. The Fire Department provides ambulance services and would provide first aid to injured personnel. Firefighters have received first aid and CPR training, and some are Emergency Medical Technicians.

Injured personnel who are also contaminated shall be transported to St Anthony Lakewood Hospital by the Fire Department ambulance or reactor staff.

4.5.3.3 Medical Treatment

First aid personnel may transfer victims to a local hospital for more extensive treatment.

Medical treatment of personnel who are injured and contaminated with radioactive material will be provided by St Anthony Lakewood Hospital, Lakewood, Colorado. The hospital has an Emergency Department that is trained and prepared to handle victims of radiation accidents.

Notification to the hospital that injured personnel are being transported to the emergency room will be by telephone, internet, or radio. A telephone number of the hospital emergency department to be notified in the event of an emergency is maintained at the reactor facility and other locations in the Nuclear Science Building.

4.5.4 Communications Equipment

There are multiple telephones, on multiple lines, within the operation's boundary. There is also an intercom system in the same area. There are other telephone lines in the Nuclear Science Building.

Fire Department and FPS personnel have 2-way radio equipment in their vehicles and also are equipped with hand-held 2-way radios which provide communication to their respective dispatch centers.

Very loud horns are used within the Nuclear Science Building to signal evacuation of certain areas.

4.6 Recovery

For recovery from any of the classes of emergencies described in the Plan, the Reactor Health Physicist and the Reactor Supervisor, or their designated alternates, will determine if it is safe to return to the facility and resume operations. If fire was involved, the Fire Chief or the incident commander will be consulted concerning reentry procedures. The individuals making the determination shall consider the severity of the incident and review which reactor safety systems or health physics systems may have been affected adversely, and those systems will be checked for proper operation prior to resumption of routine operations.

The Reactor Supervisor shall comply with the reactor facility Technical Specifications and Title 10, Code of Federal Regulations requirements.

4.7 Maintaining Emergency Preparedness

4.7.1 Training and Drills

Personnel assigned to the Nuclear Science Building are given instructions regarding evacuation procedures. Reactor staff members are required to review emergency procedures on an annual basis, not to exceed 15 months. The Reactor Health Physicist trains the first-responding fire

and rescue crews in the radiation hazards that might be encountered during an emergency, and conducts retraining sessions at biennial intervals not to exceed 30 months. Other fire fighters will be trained by their training dept. and will be offered a tour of the reactor facility. Firefighter training is given by the Fire Department.

Ambulances are manned by members of the Fire Department. The training program for Emergency Medical Technicians is under the direction of a local hospital. Emergency Medical Technicians are certified by the State of Colorado.

The Reactor Health Physicist assists the reactor staff or ambulance crew if transportation of injured, contaminated personnel is required.

St Anthony Lakewood Hospital, which provides medical treatment for injured personnel who are contaminated, has an internal training program for their personnel.

The radiological assistance teams from DOE contractors are trained through the DOE Radiological Assistance Program.

An operational check of the [REDACTED] alarm circuit from the Reactor Facility to the FPS is made during the monthly check of reactor equipment.

A simulated incident requiring evacuation of the Reactor Facility will be conducted annually, not to exceed 15 months. As part of the exercise, the reactor staff will actuate the alarm system to the FPS to test the response of that group. Biennially, not to exceed 30 months, the simulated incident shall test communication links and notification procedures with the fire department, hospital, and DOE contractor.

A critique of each drill will be conducted by the reactor staff and deficiencies will be identified and corrected.

4.7.2 Plan Review and Update

All changes to the Emergency Plan must be approved by the Reactor Supervisor. The Reactor Supervisor shall be responsible for the revision and update of the Plan. A review and audit of the Emergency Plan will be conducted by the Reactor Operations Committee as specified in the Technical Specifications. The Plan and Procedures will be modified as needed to incorporate results of training exercises and to account for changes in the facility or in the environs. Written agreements, as needed, with outside organizations will be renewed and call lists will be updated on a biennial basis, not to exceed 30 months.

Members of the emergency organization will be advised in writing of changes in the Plan that affect their organization.

4.7.3 Equipment Maintenance

The Reactor Health Physicist is assigned responsibility for ensuring the readiness of emergency equipment and supplies. A calibration schedule has been established for monitoring instruments where appropriate.