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Procedure Change Process			


Attachment 3, Procedure Editorial Change Traveler (PEC)

SECTION 1 - INITIATOR PEC IDENTIFICATION						
					PRGGN: <u>2016-565</u>	
Procedure Number: <u>10-S-01-23</u>		Unit Number: <u>1</u>		Current Revision: <u>4</u>		
Procedure Title: <u>Reentry</u>						
Type of Editorial Change:	<input type="checkbox"/> A	<input checked="" type="checkbox"/> B <u>1</u>	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E1	<input type="checkbox"/> F1 Pen & Ink change in field
Describe Editorial Correction: <u>Correct title on pages i + ii from 'Recovery' to 'Reentry'</u>						
Initiator: <u>R. VAN DEN AKKER</u>					Date: <u>7-13-16</u>	
Print Name		Signature				
SECTION 2 - PLANT MANAGEMENT STAFF APPROVAL						
Plant Management Staff: <u>SEPP SOSTER</u>					Date: <u>7-13-16</u>	
Print Name		* Signature				
* Signature indicates PEC is accurate, consistent with PEC types of Page 2 or 3. This also indicates approval for immediate use (pen and ink change in field-F1) is provided.						
NOTE: 14 Working day clock starts upon Plant Management Staff Approval.						
SECTION 3 - PROCEDURE WRITER REVIEW						
Assigned Procedure Writer: <u>R. Van Don Akker</u>				New Revision Number:		<u>5</u>
SECTION 4 - SUPERVISION REVIEW						
Review by: <u>Dave Ellis</u>					Date: <u>7/13/16</u>	
Print Name		Signature				
Note: The person performing the Plant Management Staff Approval may also be the same person performing the Supervisor Review. The Initiator CANNOT be either of the two.						

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Attachment 3, Procedure Editorial Change Traveler (PEC), Continued

PEC Type	Description
A.	Correction of the following obvious editorial errors:
	1. Punctuation, Capitalization or Misspelled words or obvious typographical errors
	2. Redundant words or phrases
	3. Omitted symbols
	4. Misplaced decimals
	5. Incorrect units of measure
	6. Step/section/revision number discrepancies
	7. Page number discrepancies
	8. Cloning errors (Obvious step or part of a step copied incorrectly from an opposite unit procedure).
	9. Equipment positions, conditions or settings when incorrect.
	10. Inadvertent deletion of information from a previously approved version of the document.
	11. Step refers user to an incorrect Attachment or branches to an incorrect step.
	12. Equipment locations or descriptions.
	13. Corrections/enhancements to page layouts or word processing features.
	14. Incorrect pagination
	15. Incorrect transitions
	16. Digital data corruption errors caused by software conversions.
B.	Minor non-technical changes that enhance understanding:
	1. Grammatical errors and sentence structure.
	2. Restoring or adding sign-offs, signature lines, date lines or place keeping tools.
	3. Corrections to reference pages including the Title Page, Summary of Revisions, and Table of Contents.
	4. Correction to Attachment identifiers for consistency throughout the document.
	5. Clarifying or adding information to Notes, Warnings, Cautions, and Steps when they clearly do not change the technical performance or intent of the step.
	6. Convert Initial Condition action steps that would be more appropriate as the first steps of a procedure into procedure steps.
	7. Indicating or modifying text at the beginning of a section to indicate the Technical Procedure Usage Level.
	8. Changes to component verification practices to be consistent with EN-HU-106, Procedure and Work Instruction Use and Adherence.

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Attachment 3, Procedure Editorial Change Traveler (PEC), Continued

PEC Type	Description
C.	Updating existing information due to organizational or internal process changes:
	1. Addresses and Telephone Numbers.
	2. References including additions, deletions or title changes.
	3. Equipment descriptions or locations to be consistent with approved drawings, documents, labels, or procedure content.
	4. Updating organizational titles provided the title change does not result in a change in job functions or responsibilities referenced in the procedure.
	5. Adding, deleting or correcting document reference numbers or titles, such as: <ul style="list-style-type: none"> • Federal, State & County Regulations, NRC, EPA, OSHA, COMAR Codes and Standards, ANSI, Corporate and Station policies, directives and procedures.
	6. Correcting Tech Spec/FSAR/FSAR/TRM/ODCM reference numbers.
D.	Minor corrections due to changes in already existing processes:
	1. Identifying previously incorporated text with a commitment or similar reference.
	2. Word processing of previously approved pen and ink changes.
	3. Provide commitment source information (for example, NRC, INPO).
E.	Identical changes previously reviewed and approved (OSRC approval, Technical Review) in another procedure:
	1. Different procedures performing the same activity such as procedures on the opposite unit or train.
F.	Pen & Ink changes performed in the field:
	1. Pen & Ink changes requires at least one criterion from A, B, or C above and Management Staff member signature. (Section 5.15 Procedure Editorial Change (PEC) Process).

PLANT OPERATIONS MANUAL

Volume 10
Section 01

10-S-01-23
Revision: 005
Date:

REFERENCE USE

EMERGENCY PLAN PROCEDURE

REENTRY

SAFETY RELATED

Prepared: _____

Reviewed: _____
 Technical

Approved: _____
 Manager, Emergency Planning

List of Effective Pages:

Pages 1-7

List of TCNs Incorporated:

<u>Revision</u>	<u>TCN</u>
0	None
1	None
002	None
003	None
004	None
005	None

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RPTS FORM

REQUIRED REVIEW PERFORMED (Check all that apply)	<input checked="" type="checkbox"/> PAD (EN-LI-100)	<input type="checkbox"/> 50.59 Evaluation (EN-LI-101)
	<input type="checkbox"/> 72.48 Evaluation (EN-LI-112)	<input type="checkbox"/> 50.54 Evaluation (ENS-NS-210)
	<input type="checkbox"/> PAD Not Required (EN-LI-100 or 01-S-02-3) <input type="checkbox"/> Process Applicability Excluded <input type="checkbox"/> Editorial Change <input type="checkbox"/> ISI/IST Implementation <input type="checkbox"/> TCN Incorporation or Auto Rev. <input type="checkbox"/> Other Process-Number: _____	
Transmit applicable Review Form as a separate record along with procedure to Document Control.	PAD Reviewer: _____ / _____ (for PAD Not Required) Signature/Date	

Cross-Discipline review required?	() Yes	(Note affected Departments Below)
	(X) No	
Preparer Initials>>>	 	

Department Cross-Discipline Reviews Needed	Signoff (signed, electronic, telcon)

Does this directive contain Tech Spec Triggers? () YES (X) NO

REQUIREMENTS CROSS-REFERENCE LIST

Requirement Implemented Name	by Directive Paragraph Number	Directive Paragraph Number That Implements Requirement
Tech Spec	5.4.1.B	*
GGNS Emer Plan	9.2.S3(A), (B), (C)	6.4.1a, b, c
GGNS Emer Plan	9.2.S3(D)	6.3.1
GGNS Emer Plan	9.3.S8, S9	6.1.2a thru c
GGNS Emer Plan	9.2.S4a, b, c & d	6.2.1

* Covered by directive as a whole or by various paragraphs of the directive.

NOTE
The Equipment Database (EDB) Request statement is applicable only to Volume 06 and 07 maintenance directives.

EDB Change Request generated and the backup documentation available for setpoint and/or calibration data only Yes N/A EDCR # _____

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Current Revision Statement

Revision 005:

- Correct title on top of pages i and ii from Recovery to Reentry. This is an editorial change.

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1.0 PURPOSE AND DISCUSSION

1.1 Purpose

To provide general guidance for the reentry phase of an emergency.

1.2 Discussion

The immediate actions in response to an emergency at GGNS are directed toward limiting the consequences of the incident in a manner that affords the maximum protection to plant personnel and the general public.

2.0 RESPONSIBILITIES

2.1 Emergency Director - Maintains overall responsibility for the operation and control of the plant.

2.2 Operations Support Center Manager - Is responsible for using the guidelines of this procedure for the organization, control and operation of Reentry and Recovery Teams. He reports findings to Emergency Plant Manager.

2.3 Radiological Coordinator - Is assisted by the Rad Chem Coordinator in the OSC and is responsible for ensuring Reentry and Recovery Teams observe approved Health Physics procedures and radiation exposure limits. Ensures that the Emergency Director is informed of current radiological conditions.

2.4 Rad Chem Coordinator - Is responsible for providing RP coverage for reentry Team(s). He is responsible for directing on-site monitoring, sampling and decontamination. He provides radiological protection information for Reentry Team(s). He reported all results to the OSC Manager.

2.5 Reentry Teams - Perform comprehensive radiological surveys of previously evacuated plant areas to perform assessments of damaged plant equipment.

2.6 Recovery Manager - Is responsible for Overall recovery activities and for implementing 10-S-1-23, Reentry, as necessary to support recovery operations.

2.7 Recovery Radiological Manager - Is responsible for health physics and radwaste activities in support of the recovery operations. Any entry back into EPZ evacuated areas of site personnel is coordinated via the lead government agencies that issued any protective actions. The Recovery Radiological Manager (or Radiological Assessment Coordinator) will coordinate licensee resources return to the site via dialogue and coordination with these lead government agencies.

2.8 Emergency Plant Manager - He shall direct the OSC Manager to develop those plans as appropriate and to implement the formulated plans.

3.0 REFERENCES

3.1 GGNS Emergency Plan

3.2 NUREG 0654

3.3 Emergency Plan Procedure, 10-S-1-29, Operation Support Center Operations

3.4 Emergency Plan Procedure, 10-S-01-22, Recovery

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- 3.5 Administrative Procedure, 01-S-08-2, Exposure and Contamination Control
- 3.6 Emergency Plan Procedure, 10-S-01-20, Administration of Potassium Iodide
- 3.7 Radiation Protection Instruction, 08-S-02-22, Personnel Decontamination

4.0 ATTACHMENTS

None

5.0 DEFINITIONS

- 5.1 Recovery Actions - Those actions taken after the emergency to restore the plant to pre-emergency conditions.
- 5.2 ED - Emergency Director
- 5.3 OSC - Operations Support Center
- 5.4 EOF - Emergency Operations Facility
- 5.5 EPP - Emergency Plan Procedure
- 5.6 TSC - Technical Support Center
- 5.7 EPM - Emergency Plant Manager (TSC)
- 5.9 RC - Radiological Coordinator (TSC)
- 5.10 RCC - Rad Chem Coordinator (OSC)

6.0 DETAILS

6.1 General Requirements

- 6.1.1 Once the corrective and protective actions have established an effective control over the situation, the emergency response actions shift into the recovery phase during which all actions are planned and deliberate.
 - a. Radiation protection administrative requirements and controls should be implemented, including normal radiation exposure limits, RWPs, ALARA reviews and radiological postings per Reference 3.5.
 - b. Maintenance activities should be performed in accordance with approved plant directives, including such control as Maintenance Action Items, equipment tag-out, and review of the planner work activity by the Shift Manager.
 - c. Operations activities should be performed in accordance with approved plant directives.

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6.1.1 (continued)

NOTE

During initial response to an emergency a licensed Senior Reactor Operator may authorize the emergency suspension of some normal quality assurance procedures and administrative controls, license conditions, and Technical Specifications. For plant recovery, this provision allowed per Reference 3.1, should not be authorized.

- 6.1.2 Depending on the nature and severity of the emergency, the recovery phase may be:
- Completed by the Emergency Organization prior to termination of the emergency classification.
 - Establish a Recovery Organization if the recovery operations will be complicated or will extend over a relatively long period of time.
 - Not necessary

NOTE

This procedure addresses actions to be taken after a major event. Portions of this procedure may be applied to reentry operations for any declared emergency (Unusual Event, Alert, Site Area Emergency, or General Emergency).

Personnel actions and responsibilities are dictated by procedure as each emergency facility is activated.

6.2 Reentry Assessment

- 6.2.1 The initial reentry into the plant areas encompasses the following goals (in order of priority):
- Determination of the initial required recovery operations (application of clearance tags, etc.)
 - Visual observation of hazards or potential hazards associated with the recovery operations
 - Conduct comprehensive radiation surveillance of plant facilities and define radiological problem areas
 - Isolate and post areas in the plant with radiological warning signs, and rope barriers, as appropriate.
- 6.2.2 Reentry to affected areas of the plant which have been evacuated is to be planned and deliberate.
- 6.2.3 The reentry phase is not to be initiated until the initial corrective and protective actions have been taken to establish effective control over the emergency situation.

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- 6.2.4 The OSC Manager must obtain the approval of the Emergency Plant Manager prior to sending the initial Reentry Team into the plant.
- 6.2.5 Utilize all available data including area and process monitor readings, survey data, and personnel observations to determine:
 - a. Which plant area(s) is affected.
 - b. The conditions in the area, such as personnel hazards, temperature, toxic environment, and equipment condition.
 - c. Whether or not there are personnel in the area(s) who need assistance.
 - d. The time scheduled, based on necessity, for reentry to commence.
- 6.2.6 Isolate and post areas determined to be unsafe or unnecessary to be reentered with appropriate warning signs and rope barriers.

6.3 Reentry Preparation

- 6.3.1 The OSC Manager should assign appropriately trained personnel to each Reentry Team based upon the assigned tasks of the team: For example:
 - a. An initial Reentry Team assigned to perform comprehensive radiological surveys of evacuated plant areas should be manned primarily by Health Physics qualified personnel. This team should preplan the following activities:
 - (1) Areas to be surveyed
 - (2) Anticipated radiation and contamination levels
 - (3) Radiation survey equipment required
 - (4) Shielding requirements and availability
 - (5) Protective clothing and equipment required
Access control procedures
 - (7) Exposure control limits and personnel dosimetry required
 - (8) Decontamination requirements
 - (9) Communications

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6.3.1 (continued)

- b. A Reentry Team assigned to perform assessments of damaged plant equipment should be manned by personnel from the following sections as appropriate:
 - (1) Operations
 - (2) Engineering
 - (3) Maintenance
 - (4) Radiological Protection
- c. A Reentry Team may also be assigned to perform both radiological surveillance and damage assessment functions.

6.3.2 The team members should complete an Emergency Exposure Authorization form in accordance with 01-S-08-2, Exposure and Contamination Control, if high radiation levels are expected.

6.3.3 For safety purposes, ensure that each reentry team is composed of at least two individuals.

6.3.4 Ensure that the OSC maintains a current status board on reentry team operations and that reentry personnel log out of the OSC prior to departing on assigned reentry activities.

6.4 Reentry into Radiological Affected Areas

6.4.1 The Rad Chem Coordinator reviews the following prior to plant reentry

- a. Radiation surveillance data available from plant instrumentation and OSC Response Team survey information to determine plant areas potentially affected by abnormal levels of radiation or contamination
- b. Radiation exposures of personnel assigned to participate in reentry operations and to determine need for additional personnel.
- c. Adequacy of available survey instrumentation and equipment (type, range, number, calibration, etc.).
- d. Reentry team checklist, procedures, radiation areas, exposure limits, communication, shielding requirements and areas to be surveyed.

6.4.2 Personnel selected for reentry teams should report to the OSC for their briefing.

6.4.3 Administer potassium iodine, as necessary, according to 10-S-01-20, Administration of Potassium Iodide, if high levels of radioactive iodine are encountered.

6.4.4 Direct reentry personnel to monitor radiation levels and take appropriate samples along reentry route.

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- 6.4.5 Ensure that the reentry team leader maintains continuous communications with OSC, if possible, or otherwise at predetermined intervals to report progress of the reentry and observed conditions.
 - 6.4.6 Coordinate the return of the reentry team to the control point.
 - 6.4.7 Debrief team member at the OSC. Notify the EPM/Recovery Manager of the status of the reentry team(s). Report the results and findings of the reentry to the EPM/Recovery Manager.
 - 6.4.8 Determine the need for additional reentries and, if required, for the initiation of recovery operations in accordance with 10-S-01-22, Recovery, if recovery operations are not already initiated.
- 6.5 Reentry into Environmentally or Structurally Affected Areas
- 6.5.1 When entering environmentally or structurally affected areas (i.e., steam leak, smoke, flooding, earthquake damage, toxic atmosphere, etc.), ensure that appropriate measures are taken for personnel safety, including the following:
 - a. Reduce the potential hazards to reentry personnel, if possible, by actions such as ventilation purge or the securing of systems.
 - b. Outfit personnel with appropriate emergency equipment, such as self-contained breathing apparatus, steam suits, flashlights, tow lines, specials tools and communication devices as required.
 - c. Test the equipment for operability prior to reentry.
 - d. Direct reentry personnel to withdraw to a predetermined 'safe area' if severe unanticipated or unplanned conditions are encountered, pending further evaluation of the reentry effort.
 - e. Ensure that the reentry team leader maintains continuous communications with the OSC, if possible, or otherwise at predetermined intervals to report progress of the reentry and observed conditions.
 - f. Coordinate the return of the reentry team to the control point.
 - g. Perform monitoring and decontamination in accordance with reference 3.7, if required.
 - h. Debrief team members at the OSC using OSC Team Debriefing Form (EPP 29-13), or similar. If radiological hazards were present, the OSC Rad Chem Coordinator should also conduct a debriefing in accordance with OSC Team Debriefing Form (EPP 29-13).

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- 6.5.2 Notify the Emergency Plant Manager/Recovery Manager of the return of the Reentry team(s).
- 6.5.3 Report the results and findings of the reentry team to the Emergency Plant Manager/Recovery Manager.
- 6.5.4 Determine the need for additional reentries and for the initiation of recovery operations, if necessary.

7.0 FINAL CONDITIONS

- 7.1 Reentry Operations have been completed and all reentry teams members have been accounted for.
- 7.2 Debriefing of reentry teams members has been completed and documented.
- 7.3 Forms and paperwork generated by this procedure and emergencies are collected by the OSC Manager and forwarded to the Manager, Emergency Planning.