

This version of Cooper Nuclear Station Emergency Implementing Procedure (EPIP) 5.7.10, "Personnel Assembly and Accountability," Revision 40, is the licensee's version, issued July 13, 2016, with certain redactions of sensitive information by staff of the Nuclear Regulatory Commission (NRC) to allow release to the public. The redactions are made under 10 CFR 2.390(d)(1). The material included within is classified as publicly available information.

The following information was redacted by the NRC staff:

Attachment 8, Figure 1.

## Attachment

### Report of Change and Summary of 50.54(q) Analyses – Emergency Plan Implementing Procedure 5.7.10, Revision 40

#### Change 1 Description

Revision 40 of Emergency Implementing Procedure (EPIP) 5.7.10 added instruction to several EPIP attachments for the Technical Support Center (TSC) Security Coordinator. Implementation of this change allowed the associated position instruction manual for the Security Coordinator to be deleted.

#### Change 1 Summary of Analysis (10 CFR 50.54(q) evaluation)

##### Licensing Basis Affected by Change:

Cooper Nuclear Station (CNS) Emergency Plan (E-Plan), Section 5.2.2.14, discusses the responsibilities of the Security Coordinator.

E-Plan, Section 6.5, discusses that the Emergency Director may take on-site actions to protect station personnel and visitors during a declared emergency.

E-Plan, Section 6.5.3, discusses the process for personnel assembly and accountability for emergency response organization (ERO) personnel, non-ERO personnel, contractors, and site visitors.

E-Plan, Table 6.3-1, describes assessment actions that are conducted throughout the emergency. Action 2 of the table that discusses personnel accountability is the responsibility of the TSC Security Coordinator.

E-Plan, Appendix A, EPIP 5.7.10, describes the immediate and on-going emergency personnel assembly and accountability actions to be taken by on-site personnel including ERO members, Security personnel, contractors, and visitors in the event of a station emergency.

The change complies with assigned responsibilities of the ERO and ensures a range of protective actions are available for emergency workers during emergencies, including those for hostile action events.

##### How Change Complies with Regulations and Previous Commitments:

10 CFR 50, Appendix E, Section IV.1, requires that the emergency plans contain, but not necessarily be limited to, information needed to demonstrate compliance with the elements of: organization for coping with radiological emergencies, assessment actions, activation of emergency organization, notification procedures, emergency facilities and equipment, training, maintaining emergency preparedness, recovery, and onsite protective actions during hostile action.

NUREG-0654, FEMA-REP-1, Revision 1, Section II, Criteria J, requires that a range of protective actions have been developed for the plume exposure pathway emergency planning zone (EPZ) for emergency workers and the public, and that guidelines for the choice of protective actions during an emergency are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed. Specifically, Evaluation Criteria 5, discusses that each licensee shall have capability to account for individuals onsite at the time of the emergency, ascertain the names of missing individuals within 30 minutes of the start of an emergency, and account for onsite individuals continuously thereafter.

Two regulatory commitments are relevant to this change; one is associated with an inspection report (IR) response for development of a procedure for personnel assembly and accountability, and the other pertains to an IR response for TSC Security Coordinator's responsibility for accountability.

The change continues to comply with the above emergency preparedness regulation and previous Nuclear Regulatory Commission (NRC) commitments.

Affected Emergency Planning Functions/Impact on Effectiveness of Emergency Planning Functions:

10 CFR 50.47(b)(1); Function - Responsibility for emergency response is assigned.

10 CFR 50.47(b)(10); Function - A range of public protective action recommendations is available for implementation during emergencies.

This change to EPIP 5.7.10 does not add new responsibilities for emergency response. It improves ERO performance by providing a single source of actions for coordination of assembly and accountability and security responsibilities under the CNS E-Plan. The change meets the above planning standards and does not represent a reduction in the effectiveness of the CNS E-Plan.

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**Change 2 Description**

This change to EPIP 5.7.10 incorporates guidance already contained in Procedure 5.1 INCIDENT regarding assembly instructions if the site is undergoing a security-related incident and both the Control Room and TSC are not habitable/usable.

**Change 2 Summary of Analysis (10 CFR 50.54(q) evaluation)**

Licensing Basis Affected by Change:

CNS E-Plan, Section 3, provides a summary of each section of the E-Plan. Specifically, Section 7, describes facilities, emergency response equipment, and communications systems (on-site and off-site) available to assess emergency conditions, support emergency operations, notify off-site support agencies, provide aid to injured or contaminated personnel, and to control and mitigate incident-related damage.

E-Plan, Section 6.5, discusses that the Emergency Director may take on-site actions to protect station personnel and visitors during a declared emergency.

The change complies with guidance for the activation and subsequent operation of the on-site emergency response facilities and ensures a range of protective actions are available for plant emergency workers during emergencies, including those for hostile action events.

How Change Complies with Regulations and Previous Commitments:

10 CFR 50, Appendix E, Section IV.E., requires an alternative facility that would 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 communication with the emergency operations facility, control room, and plant security; the capability to perform offsite notifications; and the capability for engineering assessment activities, including damage control team planning and preparation, for use when onsite emergency facilities cannot be safely accessed during hostile action.

NUREG-0654, FEMA-REP-1, Revision 1, Section H, requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained.

NSIR/DPR-ISG-01, Interim Staff Guidance Emergency Planning for Nuclear Power Plants, Section IV.D, provides discussion on the requirement for licensees to identify an alternative facility that would be accessible even if the site is under threat of, or experiencing hostile action.

This change maintains compliance with NRC regulations. There are no previous NRC commitments related to this change.

Affected Emergency Planning Functions/Impact on Effectiveness of Emergency Planning Functions:

10 CFR 50.47(b)(8); Function - Adequate facilities are maintained to support emergency response.

This change coordinates two emergency response procedures and prevents conflicting guidance. The change continues to meet the planning standard described above and does not represent a reduction in the effectiveness of the CNS E-Plan.

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**Other Changes**

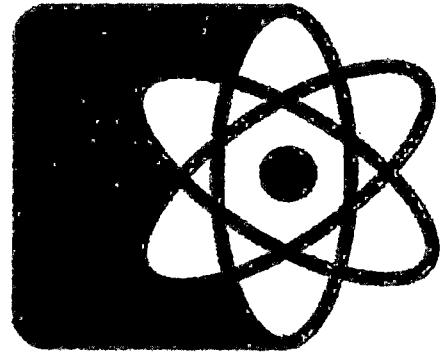
Other changes were also made to the EPIP that were determined to be editorial or did not affect an emergency planning element/function. These changes did not require a full 10 CFR 50.54(q) evaluation.

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**Enclosure**

**Emergency Plan Implementing Procedure 5.7.10, Revision 40**

**COOPER  
NUCLEAR  
STATION**



**Operations Manual  
Emergency Preparedness**

**EMERGENCY PLAN IMPLEMENTING PROCEDURE  
5.7.10  
PERSONNEL ASSEMBLY AND ACCOUNTABILITY**

**Level of Use: MULTIPLE**  
**Quality: QAPD RELATED**  
**Effective Date: 6/21/16**  
**Approval Authority: ITR-RDM**  
**Procedure Owner: EMERGENCY PREP ON-SITE COORD**

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1. ENTRY CONDITIONS(INFORMATION USE)

1.1 Emergency Director activated ERO per EPIP 5.7.2.

2. INSTRUCTIONS (INFORMATION USE)

**NOTE** – West Warehouse Designated Assembly Area (DAA) is located on west end of West Warehouse (WW).

2.1 AFTER hearing emergency alarm and associated announcement, or upon pager activation, THEN all personnel **REPORT TO** locations designated in Table 1.

<b>Table 1</b>	
<b>PERSONNEL</b>	<b>REPORT TO</b>
On-Shift Operations	Control Room unless otherwise directed by Control Room
On-Shift Fire Brigade	
Off-Shift Operations with ERO Assignment	Emergency Response Facility unless otherwise directed by Control Room
Off-Shift Operations without ERO Assignment	West Warehouse DAA unless otherwise directed by Control Room
ERO Personnel	Emergency Response Facility unless otherwise directed by Control Room
All Remaining Personnel	West Warehouse DAA and monitor Gaitronics for further instructions

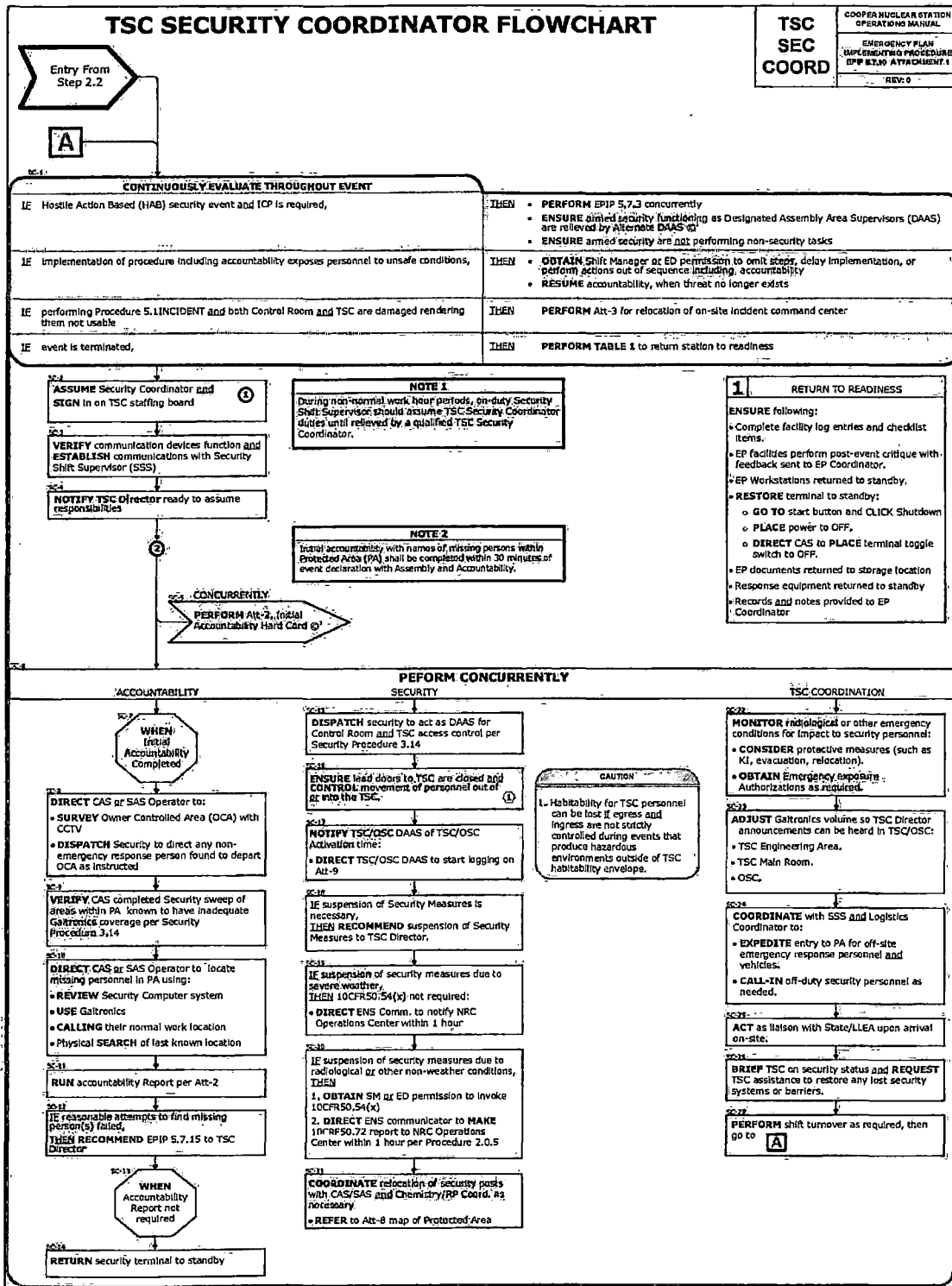
2.2 TSC Security Coordinator **PERFORM** Attachment 1 Flowchart.

2.3 ERO DAA Supervisors **PERFORM** attachment listed in Table 2.

<b>Table 2</b>	
<b>ERO POSITION</b>	<b>PERFORM</b>
Control Room DAA Supervisor	Attachment 4
TSC/OSC DAA Supervisor	Attachment 5
West Warehouse DAA Supervisor	Attachment 6
EOF DAA Supervisor	Attachment 7

2.4 IF emergency not security related, THEN CAS or SAS **PERFORM** radio check with each Security Officer to verify accountability per Security Procedure 3.14.





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ATTACHMENT 2 INITIAL ACCOUNTABILITY HARD CARD (REFERENCE USE)©<sup>3</sup>

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ATTACHMENT 2 INITIAL ACCOUNTABILITY HARD CARD (REFERENCE USE)©<sup>3</sup>

1. **CONTACT** CAS and **ENSURE** Initial Accountability of personnel has been started on Security Computer.
  - 1.1 IF CAS has not initiated accountability report, THEN **DIRECT** CAS to initiate "Accountability" command in Security Computer System.
2. **OBTAIN** and **RECORD** official time emergency declared from one of following:
  - Plant announcement.
  - Facility Log.
  - Contact Control Room. Time Emergency Declared: \_\_\_\_\_

**NOTE** – Names of missing individuals within Protected Area shall be ascertained within 30 minutes of declaration of emergency where Assembly and Accountability is performed.

3. **DETERMINE** and **RECORD** time Initial Accountability required.
  - Time recorded in Step 2 plus 30 minutes.

Time Initial Accountability Required: \_\_\_\_\_

4. **ENSURE** Access Control is manned and access to Protected Area is controlled per Step 8.

**NOTE** – Security sweeps of areas within PA identified as lacking adequate Gaitronics coverage does not have to be completed for Initial Accountability.

5. **DISPATCH** Security to commence sweep of areas identified as having inadequate Gaitronics System coverage per Security Procedure 3.14.
6. **TURN ON** security terminal in TSC and **PERFORM** following:
  - 6.1 **DIRECT** CAS to place toggle switch for TSC terminal to ON.
  - 6.2 WHEN prompt appears on screen, THEN simultaneously **DEPRESS** "CTRL", "ALT", and "DEL" buttons.
  - 6.3 At password prompt, **ENTER** PASSWORD.

- 6.4 **CLICK** "Start" button.
- 6.5 **CLICK** "Shortcut to N Smart.mdb".
- 6.6 **INSERT** card into reader.
- 6.7 At report screen under Operator Tools, **FIND** and **CLICK** on "Accountability Report".
- 6.8 **CLICK** button on TSC terminal that states "People in the plant not logged into Accountability area now".
7. **VERIFY** number of persons on report is lowering by repeating Step 6.8.
8. At least 5 minutes before Initial Accountability is due, **DIRECT** Access Control to secure access to Protected Area.
9. WHEN PA access secured,  
THEN **OBTAIN** permission from Security Shift Supervisor (SSS) or TSC Security Coordinator for access by non-emergency response personnel.
10. **RUN** Initial Accountability Report by repeating Step 6.8.
11. WHEN SSS/TSC Security Coordinator is aware of status for each person listed on Initial Accountability Report,  
THEN **DECLARE** Initial Accountability complete.
12. **RECORD** time Initial Accountability completed in facility log.
13. **NOTIFY** TSC Director and Emergency Director of Initial Accountability Report results.
14. **OBTAIN** a printed copy of Initial Accountability Report using TSC Security Computer System printer.
  - 14.1 IF report is printed on SAS or CAS printer,  
THEN **DELIVER** printed copy to TSC Security Coordinator.
15. **RETURN** to Attachment 1 Flowchart for Post-Initial Accountability actions.

**NOTE** – Security Building/CAS area serves as on-site command center for security, fire brigade, and specific ERO personnel when on-site ERFs are not available.

1. IF performing Procedure 5.1 INCIDENT and both Control Room and TSC are damaged rendering them unusable, **THEN PERFORM** following:
  - 1.1 Following available personnel **REPORT** to Security Building/CAS:
    - Non-watch Operations personnel.
    - Non-watch Security personnel.
    - Fire Brigade members not actively fighting fire.
    - Control Room Dose Assessor.
    - Control Room Shift or Technical Communicator.
    - On Duty Radiological Protection personnel.
  - 1.2 Remaining TSC and OSC staff **REPORT** to Alternate Off-Site location in EOF per EPIP 5.7.8.2.
  - 1.3 IF Security Building/CAS not available, **THEN** personnel listed in Step 1.1 **REPORT** to Learning Center Building Classrooms H, I, and J.

**NOTE** – Armed Security personnel will not assume DAAS role or perform non-security tasks during security-related emergency events. ©<sup>1</sup>

1. Security or Station Operator **ASSUME** DAAS role.
  - 1.1 IF Security or Station Operator unavailable, THEN Shift Manager **ASSIGN** any available person to Control Room DAAS role.
2. **OBTAIN** Accountability Log Book from bookshelf in Control Room.
3. **OBTAIN** names and badge numbers of personnel not in Control Room under direction of Control Room in process of supporting emergency response efforts.
4. **ESTABLISH** communications with TSC Security Coordinator (telephone Ext. 5620).
5. **PROVIDE** names and badge numbers of personnel under direction of Control Room to TSC Security Coordinator.
6. **ENSURE** Attachment 9, Continuous Accountability Log Sheet, is completed for each individual entering or exiting Control Room.

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ATTACHMENT 5      TSC/OSC DESIGNATED ASSEMBLY AREA SUPERVISOR  
INSTRUCTION HARD CARD (INFORMATION USE)

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ATTACHMENT 5    TSC/OSC DESIGNATED ASSEMBLY AREA SUPERVISOR INSTRUCTION HARD CARD (INFORMATION USE)

**NOTE** – Armed Security personnel will not assume DAAS role or perform non-security tasks during security-related emergency events. ©<sup>1</sup>

1. Security or TSC Security Coordinator **ASSUME** DAAS role.
  - 1.1 IF Security or TSC Security Coordinator unavailable, THEN TSC Director **ASSIGN** any available person to TSC-DAAS role.
2. **ESTABLISH** checkpoint just inside north TSC/OSC door.
3. **OBTAIN** clipboards and copies of Attachment 9, Continuous Accountability Log Sheet (pillar outside OSC Room).
4. **ESTABLISH** communications with TSC Security Coordinator (telephone Ext. 5620).

**NOTE** – All teams entering plant are tracked in OSC by OSC Supervisor in addition to being tracked on Attachment 9.

5. **ENSURE** Attachment 9 is completed for each individual entering or exiting TSC.

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ATTACHMENT 6 WEST WAREHOUSE DESIGNATED ASSEMBLY AREA  
SUPERVISOR INSTRUCTION HARD CARD (INFORMATION  
USE)

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ATTACHMENT 6 WEST WAREHOUSE DESIGNATED ASSEMBLY AREA SUPERVISOR INSTRUCTION HARD CARD (INFORMATION USE)

1. One of following shall **ASSUME** West Warehouse (WW) Designated Assembly Area Supervisor (DAAS) role:
  - Logistics Coordinator.
  - QA Department personnel.
  - Licensing Department personnel.
  - Projects Department personnel.
2. IF above personnel unavailable, THEN Logistics Coordinator in EOF **ASSIGN** any available person to WW-DAAS role.
3. **ESTABLISH** communications with Logistics Coordinator in EOF.
4. **ASSIGN** personnel to assist in completing this section.
  - 4.1 **REQUEST** non-ERO personnel to assemble in public areas (lunchrooms, hallways) of WW area next to Human Performance Flow Loop Simulator.
  - 4.2 **REQUEST** ERO personnel released from Emergency Response Facilities (ERFs) to assemble in WW area next to Human Performance Flow Loop Simulator.
  - 4.3 **COORDINATE** movement of personnel into or out of WW with Logistics Coordinator.
  - 4.4 **ENSURE** Attachment 9, Continuous Accountability Log Sheet, is completed for each individual entering or exiting WW.
  - 4.5 **DISTRIBUTE** Dismissal Information Sheets or Evacuation Maps per EPIP 5.7.11 to personnel prior to dismissal or evacuation.
5. **ASSIST** Logistics Coordinator in completing roster for ERF relief (24 hour staffing).
6. IF 12.5 kV System power is lost to WW, THEN **INFORM** Logistics Coordinator that Gaitronics speakers in WW will only operate from UPS until batteries are depleted.

7. **MAKE** announcements and **PROVIDE** information to assemble personnel, as required, to augment Gaitronics announcements.



ATTACHMENT 7 EOF DESIGNATED ASSEMBLY AREA SUPERVISOR INSTRUCTION HARD CARD (INFORMATION USE)

1. Logistics Coordinator or Emergency Preparedness Coordinator **ASSUME** DAAS role.
  - 1.1 **IF** Logistics Coordinator or Emergency Preparedness Coordinator unavailable,  
**THEN** EOF Director **ASSIGN** any available person to EOF DAAS role.
2. **ENSURE** all personnel associated with State, Local, or Federal agencies present proper government identification before allowing EOF access.
3. **RESTRICT** EOF access to approved personnel only.
4. **ENSURE** Attachment 9, Continuous Accountability Log Sheet, is completed for each individual entering or exiting EOF.

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ATTACHMENT 8 SECURITY BRE AND EFFLUENT RELEASE LOCATIONS MAP  
(INFORMATION USE)

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ATTACHMENT 8 SECURITY BRE AND EFFLUENT RELEASE LOCATIONS MAP (INFORMATION USE)

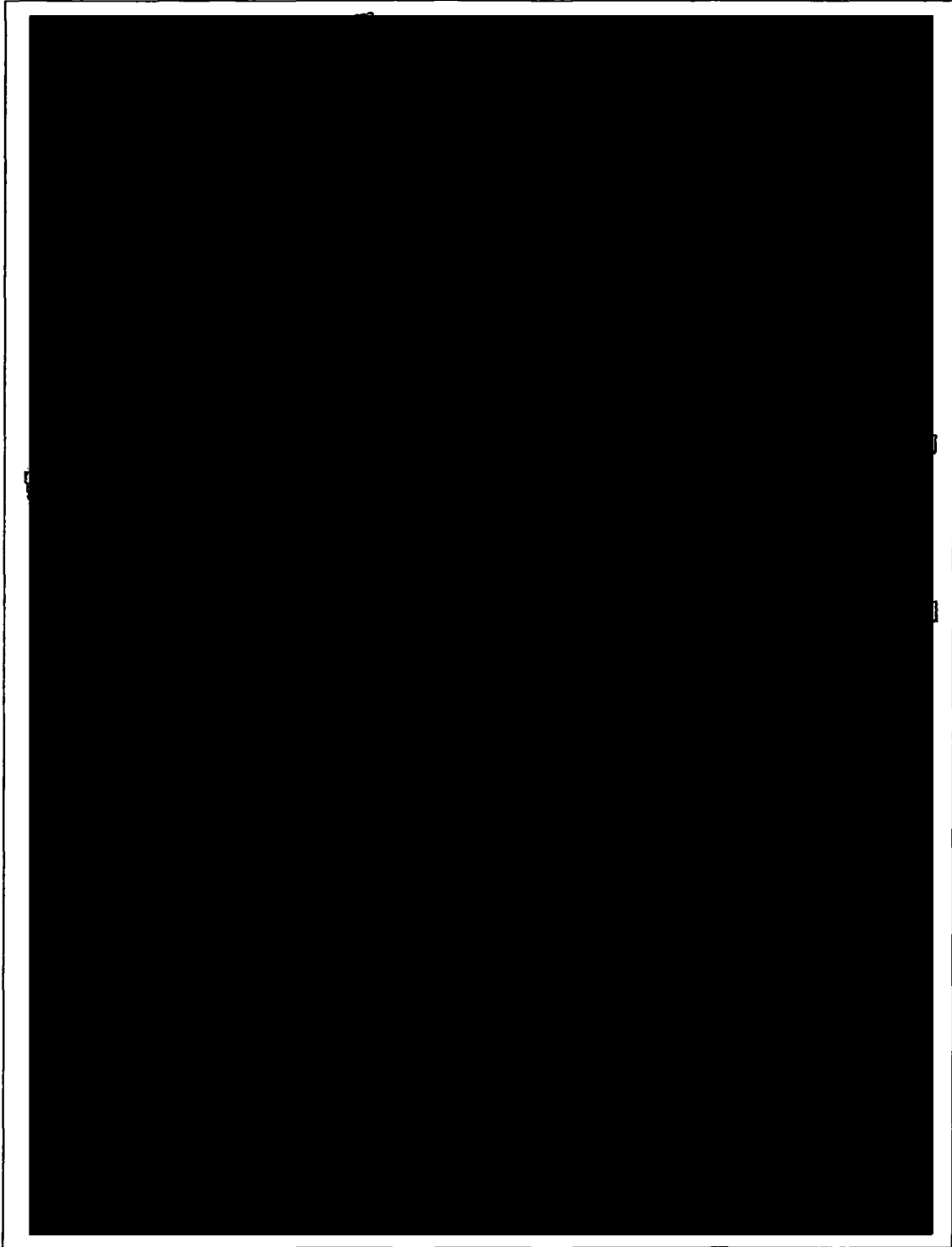


Figure 1



1. PURPOSE<sup>1</sup>Ⓞ<sup>2</sup>

1.1 Implement personnel Assembly and Accountability per CNS Emergency Plan.

2. PRECAUTIONS AND LIMITATIONS

2.1 To protect personnel from exposure to unsafe conditions (e.g., tornado, security event, or downed power line), implementation of this procedure may be delayed, portions may be omitted, or sections may be performed out of order as directed by SM or Emergency Director.

2.2 NRC shall be notified when suspending Security Measures to protect Security personnel during weather emergencies.

3. DEFINITIONS

3.1 Assembly - To gather all personnel into designated locations to 1) assure their safety and to 2) better prepare to take further protective actions on their behalf (typically Dismissal or Evacuation; see EPIP 5.7.11).

3.2 Accountability - To ascertain names of missing individuals within Protected Area and account for these individuals continuously after Initial Accountability.

4. DISCUSSION

4.1 In event of an emergency at CNS, it is necessary that all personnel are notified of situation, their whereabouts identified for safety and security purposes, and they respond in a coordinated effort to emergency.

4.2 Safety of personnel takes precedence over Assembly and Accountability. If personnel safety would be jeopardized by Assembly and Accountability, implementation of this procedure may be delayed or modified by SM or Emergency Director.

4.3 Emergency Director is responsible for authorizing suspension of Security Measures. Suspension of Security Measures due to radiological conditions or other emergency conditions may require invoking 10CFR50.54(x), 10CFR50.54(y), or 10CFR72.32(d). Invoking 10CFR50.54(x) or 10CFR72.32(d) requires approval by an on-shift Senior Reactor Operator or Emergency Director per Procedure 2.0.1, Section 16, 10CFR50.54(x) or 10CFR72.32(d) Deviation From License.

- 4.4 Suspension of Security Measures to protect Security personnel during weather emergencies is part of Security Plan and does not require invoking 10CFR50.54(x); however, it still requires notification to NRC Operations Center.
- 4.5 CNS visitors shall receive instructions from their escort explaining what they are to do and where they are to go upon sounding of Emergency Alarm. It is responsibility of each Supervisor to know general location of his subordinates at any time.
- 4.6 An emergency signal, activated manually from Control Room, is provided to alert all personnel in vicinity of plant that emergency exists. Emergency alarm consists of distinct steady tone sounded through station intercom system. Alarm shall be sounded and appropriate announcements made to station personnel per EPIP 5.7.2 or this procedure.
- 4.7 Strobe lights are installed in some high-noise areas to augment audible alarms. These strobes are automatically activated when emergency signal is generated into Gaitronics System. Personnel have been trained to respond to flashing strobe by moving to area where announcement (which follows sounding of emergency alarms) can be clearly heard.
- 4.8 ERO personnel reporting to Emergency Response Facility within Protected Area (PA) shall card Security System badge reader for accountability purposes. Report generated by Security Computer will identify personnel who are missing.
- 4.9 On-Shift Station Operators, Licensed Operators, Chemistry/RP Technician, and Shift Technical Engineers needed for response to plant conditions remain under control of Shift Manager.
- 4.10 Extra Operations personnel not needed in Control Room for immediate emergency response may be relocated to OSC after Initial Accountability for assignment to Repair/Rescue/Monitoring Teams. Decision to relocate Operations personnel is made by Shift Manager and shall be communicated to Emergency Director, TSC Director, and OSC Supervisor.
- 4.11 All teams entering plant will be tracked in OSC by OSC Supervisor in addition to Accountability Logs.

4.12 TSC SECURITY COORDINATOR FLOWCHART

- 4.12.1 TSC Security Coordinator Flowchart on Attachment 1 is printed on an 18 inch by 24 inch laminated sheet and mounted on foam board.
- 4.12.2 Header data on upper right flowchart will contain revision number.
- 4.12.3 Table below specifies current revision of TSC Security Coordinator Flowchart.

EPIP 5.7.10 Flowchart	Revision Number
Attachment 1, TSC Security Coordinator Flowchart	0

- 4.12.4 It is not necessary that flowchart revision number be revised with each revision of this procedure.
- 4.12.5 If flowchart is revised, then Attachment 10 is revised to reflect new flowchart revision data.

5. RECORDS

- 5.1 This procedure generates no quality records.

6. REFERENCES

6.1 CODES AND STANDARDS

- 6.1.1 NPPD Emergency Plan for CNS.
- 6.1.2 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.

6.2 PROCEDURES

- 6.2.1 Conduct of Operations Procedure 2.0.1, Plant Operations Policy.
- 6.2.2 Conduct of Operations Procedure 2.0.5, Reports to NRC Operations Center.
- 6.2.3 Emergency Procedure 5.1INCIDENT, Site Emergency Incident.

- 6.2.4 Emergency Plan Implementing Procedure 5.7.1, Emergency Classification.
- 6.2.5 Emergency Plan Implementing Procedure 5.7.2, Emergency Director EPIP.
- 6.2.6 Emergency Plan Implementing Procedure 5.7.3, Incident Command Post (ICP) Hostile Action Based Event Roles and Responsibilities.
- 6.2.7 Emergency Plan Implementing Procedure 5.7.8.2, Activation of Alternate Off-Site OSC/TSC.
- 6.2.8 Emergency Plan Implementing Procedure 5.7.11, Early Dismissal/Evacuation of Site Personnel.
- 6.2.9 Emergency Plan Implementing Procedure 5.7.15, OSC Team Dispatch.
- 6.2.10 Security Procedure 3.14, Non-Security Emergencies.

### 6.3 MISCELLANEOUS

- 6.3.1 ©<sup>1</sup> TIP Action Plan 5.2.2.1, Action Step 8, Revision 2. Revise EPIP 5.7.10/5.7.11 to address changes in dismissal/evacuation. Affects entire procedure (Attachment 10, Step 1 flagged).

### 6.4 NRC COMMITMENTS

- 6.4.1 ©<sup>1</sup> NRC Commitment NLS2002030-18. Response to IR 01-09 to eliminate collateral duties of security force members. Commitment affects Attachment 1, Flowchart Step SC-1, Override Number 1; Attachment 4, NOTE prior to Step 1; and Attachment 5, NOTE prior to Step 1.
- 6.4.2 ©<sup>2</sup> NRC Commitments 811217-01-07 and 811217-01-32. Response to IR 81-13 to develop functional procedures for personnel accountability. Commitment affects entire procedure (Attachment 10, Step 1 flagged).
- 6.4.3 ©<sup>3</sup> NRC Commitment NLS9000411-01. Response to IR 90-25 to relieved Control Room Director of accountability responsibility. Commitment affects Attachment 1, Flowchart Step SC-5, and Attachment 2.