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OPERATIONS DEPARTMENT INSTRUCTION

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Approved: [signature]

OPERATIONS POLICY FOR EMERGENCY PROCEDURES

This policy describes the importance, the hierarchy, the implementing roles, the training, and the maintenance of the Emergency Operating Procedures (EOP's). Additionally, roles, responsibilities, and relationships are defined during periods when the Emergency Plan is implemented.

1. The operator is the most important element in the safety of the nuclear plant, because he has the knowledge, ability and authority to override automatic actions. The EOP's detail the operator's actions during potentially dangerous transients, and are therefore the most important set of documents NMPC possesses. Consequently, nothing shall supercede the proper engineering, writing, review, approval, training, and implementation of the EOP's.

2. EOP's supercede all other procedures, instructions and orders. EOP's are implemented, in certain cases, by OP's. Those sections of OP's that implement EOP actions shall be treated the same as EOP's.

3. When the Emergency Plan is activated, the SSS becomes the Emergency Director and the ASSS becomes the Shift Technical Advisor. A third person is summoned to the Control Room and assumes the role of Shift Emergency Plan Coordinator. The responsibilities of the Emergency Director are described in the Site Emergency Plan.

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4. The SSS shall be the operator who reads the EOP's and directs the actions of the other operators. The SSS shall assign operators to specific panels (i.e., CSO to Panel 603 until the reactor is shutdown, one E operator to Panel 601, etc.) and may give them specific orders directly without going through the CSO, in the interests of rapid and clear communications. Orders of a generic nature that involve several evolutions should be implemented through the CSO.

5. The STA shall perform the duties per NUREG 0737 and GPG-01 Revision 1 to include, but not limited to:

   a) Be in the Control Room during transients or emergencies and observe plant information displays.

   b) Make objective evaluations of plant operations and advise or assist plant supervision in correcting conditions that may compromise the safety of operations.

   c) Observe the operation of the Emergency Core Cooling Systems and confirm the availability of components of the Emergency Core Cooling Systems which were not activated by the effects of the transient.

   d) During transients and accidents, compare existing critical parameters (i.e. neutron level; reactor coolant system level, pressure and temperature; containment pressure, temperature, humidity and radiation level; and plant radiation levels) with those predicted in the Final Safety Analysis Report to ascertain whether the plant is responding to the incident as predicted.

   e) Report any abnormalities to the SSS immediately and provide assistance in formulating a plan for appropriate corrective action.

   f) Monitor applicable procedures and operator activities for possible errors and advise the SSS of appropriate corrective actions. Errors may occur due to poor or missed communications, execution of improper orders, or improper operation of manually overridden automatic controls.

   g) During emergencies be observant of critical parameters and ascertain that there is adequate core cooling, including availability of a heat sink for the coolant system.

   h) Make qualitative assessment of the plant parameters during and following an accident in order to ascertain whether core damage has occurred.

   i) In the event that critical parameters become unavailable due to instrument failure, perform calculations or through other means determine approximate values for the parameters in question.

j) Evaluate the effectiveness of plant procedures in terms of terminating or mitigating accidents and make recommendations when changes are needed.

k) Monitor other Control Room displays not directly related to the transient to note any abnormal values, undesirable trends or normal conditions.

A significant part of this responsibility is ensuring the health and safety of the public is protected by appropriate automatic and manual response, as well as appropriate implementation of the emergency plan. However, this does not preclude the STA assisting the SSS in reading the EOP's during severe transients when prompt actions in more than one EOP are concurrently required, as the EOP's by their design require the operators to maintain the perspective of overall plant status.

6. The Shift Emergency Plan Coordinator (SEPC) will take direction from the SSS, assist as needed and provide administrative support for Emergency Plan Procedure (EPP) Implementation. The SEPC shall be an on-shift RO who is not the CSO or Control Room NAOE. The person acting as SEPC shall be logged as such in the SSS Log. The SEPC's duties shall include, but are not limited to:

a) Report to the Control Room (within 10 minutes) upon activation of any station alarm and assume SEPC duties unless relieved of those duties by the SSS.

b) Obtain and complete Shift Emergency Plan Coordinator checklist.

c) Review classification chart and recommend classification to the SSS.

d) Ensure that an Operator (Radwaste or NLOT) has become the Communications Aide, provide him an event briefing and oversee his activity. TCN-1

e) Review the notification Fact Sheet prior to SSS approval.

f) Ensure that all 15 minute notifications are made.

g) Assist in completing the SSS Checklist.

h) Assist in the implementation of EPPs.

i) Brief the oncoming Site Emergency Director as directed by the SSS if the SSS is not available due to plant conditions.

j) Be available to answer update questions from outside agencies.

During normal operations, the SEPC will have routine shift assignments. The SEPC will conduct his assigned building turnover and then report to the Control Room to review and sign the Control Room E turnover sheet with appropriate discussions with the on duty Control Room E. The SEPC shall:

a) Participate in shift briefing

b) Familiarize himself with existing plant conditions, LCO's, out of service equipment, and ECCS system status.

c) Review the schedule for activities, surveillances, and maintenance, and maintain awareness of plant conditions pertaining to those evolutions throughout his shift.

7. The CSO shall oversee the implementation of OP's as delegated by the SSS. At times the CSO shall function as a control room operator, while the SSS directs specific control room actions to the operator assigned to a specific panel. However, the CSO should maintain an awareness of what all other operators are doing, especially the in-plant operators to prevent the SSS and CSO giving conflicting orders to an individual.

8. The training department will implement frequent training on the EOP's, nominally a minimum of one, eight-hour session per cycle, split appropriately between classroom and simulator. Operations management will frequently observe these sessions and lead formal performance evaluations to ensure high standards are being maintained. Training will maintain cognizance of operator performance and industry developments in EOP training standards, and inform the Operations Superintendent and obtain his approval for appropriate training modifications.

9. EOP's will be maintained by an ongoing evaluation process to ensure that:

a) Operator input is sought and incorporated as to improvements that can be made.

b) Design changes that enhance EOP implementation are given the appropriate priority.

c) Configuration management systems identify design basis changes that affect EOP steps and that changes are timely.

10. Operators must challenge orders that they do not understand or could lead to further degraded plant conditions. Operators must also provide critical plant parameter data, without being asked, that is vital to the SSS's implementation of EOPs.

ATTACHMENT 1

SHIFT EMERGENCY PLAN COORDINATOR CHECKLIST

_____ 1. Get brief from S.T.A. on plant status.

_____ 2. Obtain the following forms:

_____ a. Classification EAP-2 Att#2
_____ b. SSS Checklist EAP-1 Fig. 1

_____ 3. Ensure that an operator has come to the control room to become the communication aid (Radwaste or Operations) and provide event briefing.

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_____ 4. Make classification recommendation to SSS per EAP-2 Att#2.

_____ 5. Review notification fact sheet prior to SSS for approval.

_____ 6. Oversee the communication aide in making notifications or begin them per EPP-20 Fig. 5.

_____ 7. Assist SSS in completing his checklist EAP-1 Figure 1.

_____ 8. Check for applicability of other EPP's.

_____ 9. Make gaitronics announcement of plant status as necessary.

_____ 10. Contact other departments for assistance as necessary (i.e., R.P., Chemistry, Fire, Etc.)