

Attachment

Report of Change and Summary of 50.54(q) Analysis – Emergency Plan Implementing Procedure 5.7.6, Revision 69

Change Description

Emergency Plan Implementing Procedure (EPIP) 5.7.6, Attachment 1 and 3 flowcharts, were revised (boxes SC-14 and OFS-14) to add steps for completing the notification. Also the EPIP had previously allowed the user to inappropriately skip Step 3 of Attachment 5 for recording meteorological conditions and release status information when completing the notification report. This step was inadvertently omitted during a previous rewrite of the procedure and has been corrected and again is a requirement for completing the notification with CNS-DOSE unavailable.

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

Licensing Basis Affected by Change:

Cooper Nuclear Station (CNS) Emergency Plan (E-Plan), Section 6.3.3 discusses that CNS has the capability of performing dose projections during a radiological emergency using two separate techniques. The section provides additional description of the dose assessment methods, CNS-DOSE (computerized) and hand calculation (manual), and further discussion on the field monitoring teams.

E-Plan Section 3.5 discusses that the Emergency Response Organization is responsible for on-site emergency operations and for maintaining a continuous flow of accurate radiological and station status information to off-site emergency authorities.

E-Plan Sections 4.1.2.2, 4.1.3.2, and 4.1.4.1 provide discussion on actions taken at an Alert, Site Area Emergency, and General Emergency declaration.

E-Plan Section 5.1.2.6 discusses that the Shift Communicator is responsible for off-site communication duties.

E-Plan Section 5.2.3.3 discusses that the Off-Site Communicator is responsible for gathering and disseminating information to appropriate Off-Site Agencies in accordance with EPIP 5.7.6.

E-Plan Section 6.2.4 provides discussion on initial and follow-up notifications to off-site authorities and support agencies.

E-Plan Section 7.2.3 describes the functions of the Emergency Operations Facility in Auburn, Nebraska. The functions include management of off-site emergency response, coordination of radiological/environmental assessment, coordination of emergency response activities with Federal, State, and local agencies, determination of protective actions for the public, event classification, and notification to off-site authorities.

E-Plan Section 7.4 provides more detail on each emergency classification and the notifications made.

How Change Complies with Regulations and Previous Commitments:

10 CFR 50.47(b)(5) requires procedures have been established for notification of State and local response organizations and for notification of emergency personnel by all organizations; the content of initial and follow-up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway emergency planning zone have been established.

10 CFR 50.47(b)(9) requires methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

10 CFR 50, Appendix E, Section IV.B.1, requires that the means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety.

10 CFR 50, Appendix E, Section IV.E.2, requires adequate provisions are made and described for emergency facilities and equipment including equipment for determining the magnitude of and for continuously assessing the impact of the release of radioactive materials to the environment.

10 CFR 50, Appendix E, Section IV.D.1, requires administrative and physical means for notifying local, State, and Federal officials and agencies and agreements reached with these officials and agencies for the prompt notification of the public and for public evacuation or other protective measures, shall be described.

10 CFR 50, Appendix E, Section IV.D.3, requires licensees to have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency. The licensee shall demonstrate that the appropriate governmental authorities have the capability to make a public alerting and notification decision promptly on being informed by the licensee of an emergency condition.

The change to EPIP 5.7.6 continues to comply with the above regulatory requirements.

Commitments related to ensuring appropriate local governments are properly informed in the event of an emergency at CNS were reviewed. The change to the EPIP continues to comply with those commitments.

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

10 CFR 50.47(b)(5); Function - Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes after the declaration of an emergency and providing follow-up notifications.

10 CFR 50.47(b)(9); Function - Methods, systems, and equipment for assessment of radioactive releases are in use.

The change corrects gaps in procedure steps to complete the notification process. The change does not adversely impact the capability or method to perform accurate and timely dose assessments or notification to State and local agencies. The proposed changes do not constitute a reduction in effectiveness of the CNS E-Plan and will continue to meet E-Plan requirements and formal commitments to the Nuclear Regulatory Commission.

Other Changes

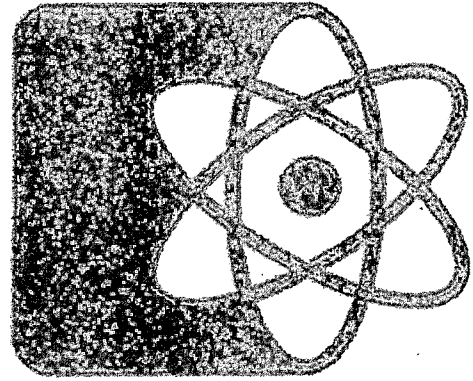
Various editorial changes were also made to EPIP 5.7.6 which did not require a full 10 CFR 50.54(q) evaluation.

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Emergency Plan Implementing Procedure 5.7.6, Revision 69

COOPER NUCLEAR STATION



Operations Manual **Emergency Preparedness**

EMERGENCY PLAN IMPLEMENTING PROCEDURE
5.7.6
NOTIFICATION

Level of Use: MULTIPLE
Quality: QAPD RELATED
Effective Date: 4/13/17
Approval Authority: ITR-RDM
Procedure Owner: EMERGENCY PREP DRILL SCEN COORD

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1. ENTRY CONDITIONS (REFERENCE USE)

1.1 EAL declared and notification required per EPIP 5.7.2.

2. INSTRUCTIONS (REFERENCE USE)

2.1 IF Off-Site Communicator reporting to EOF,
THEN PERFORM Attachment 2 to assume off-site communication role.

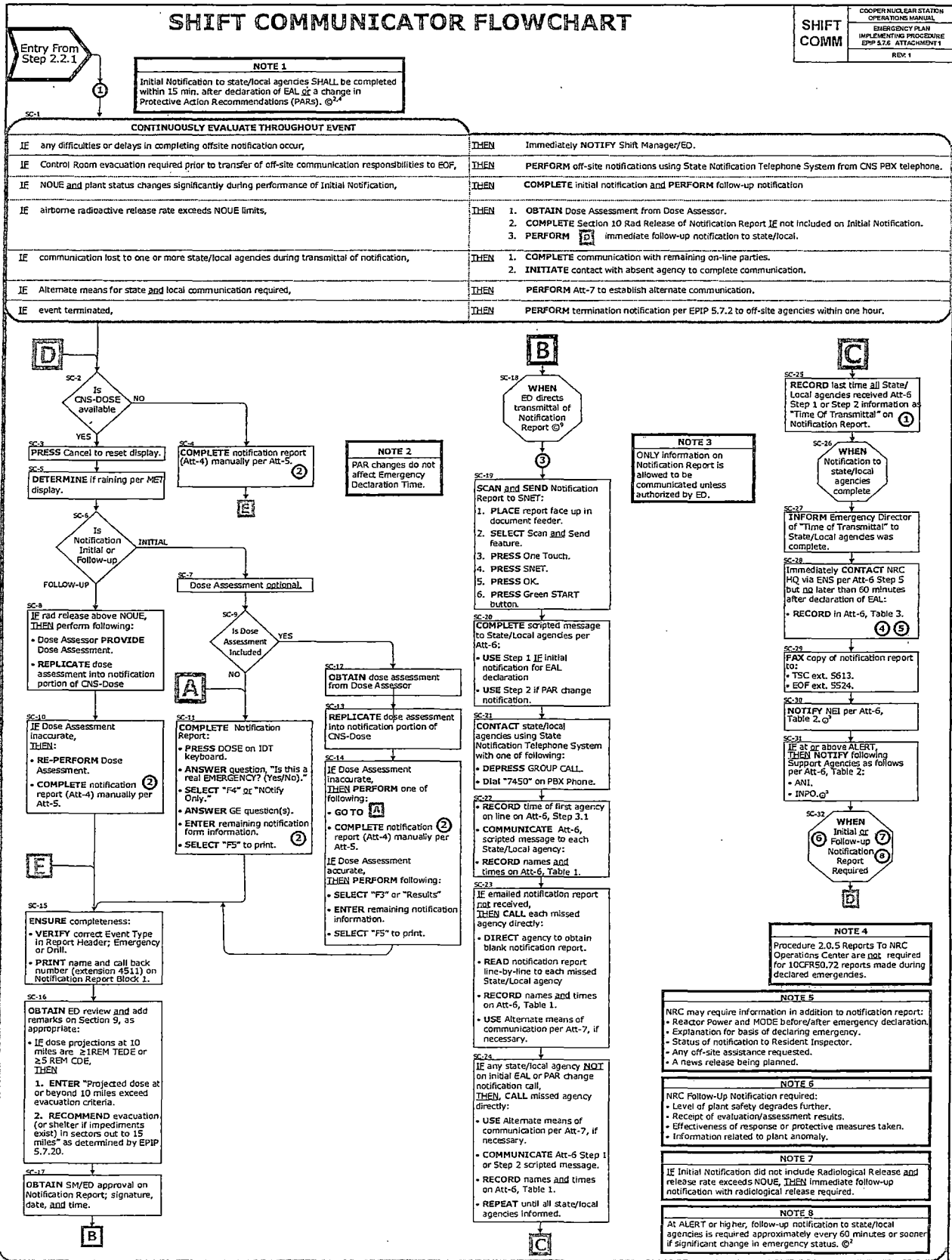
2.2 Emergency Director (ED) **DIRECTS** that Notification Report be prepared.©⁹

2.2.1 IF Shift Communicator directed to initiate Notification Report from Control Room,
THEN PERFORM Attachment 1.

2.2.1.1 WHEN TSC ENS Communicator and EOF Off-Site Communicator ready to transfer communication responsibilities,
THEN Shift Communicator:

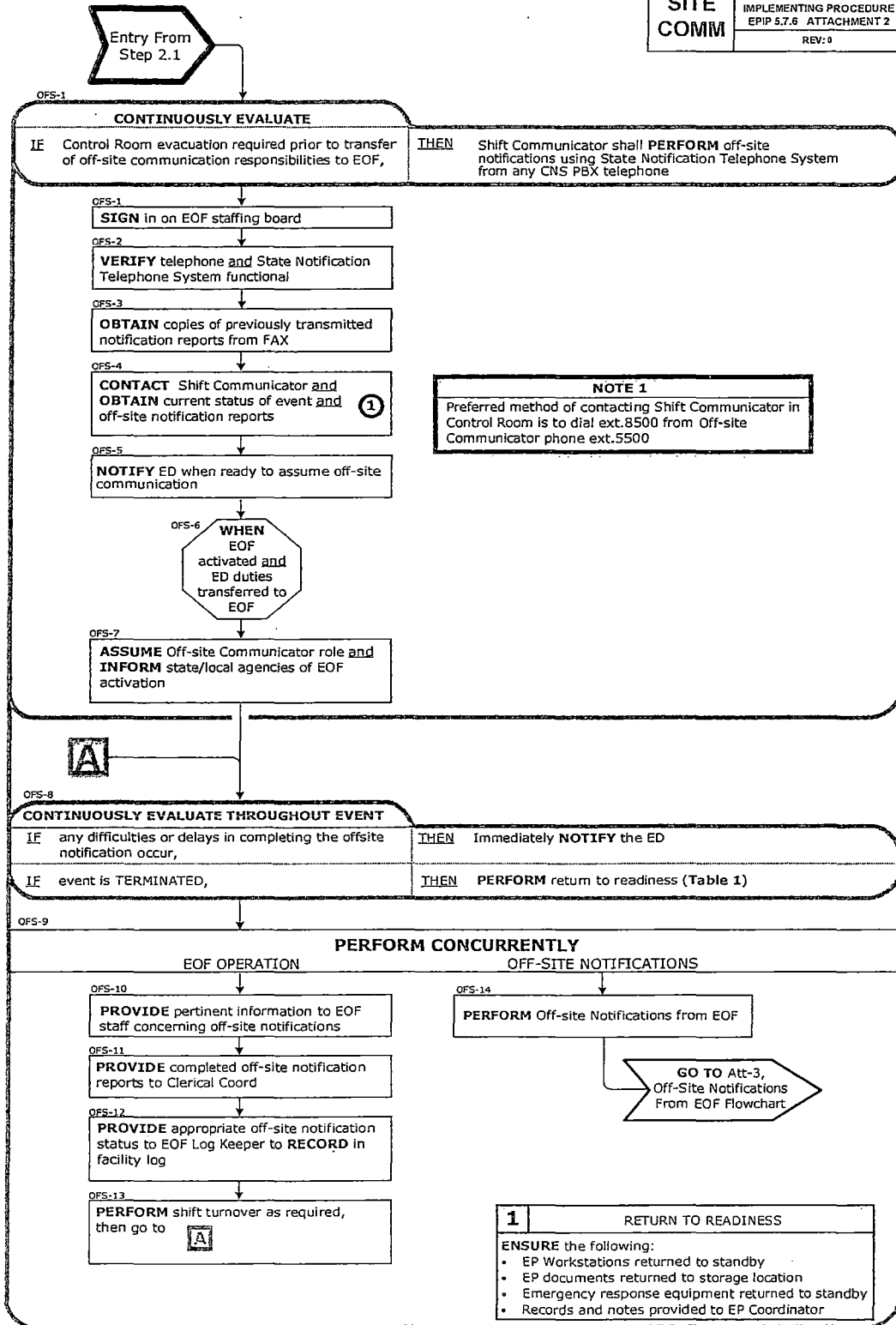
- **PERFORM** Attachment 6, Section 6.
- **INFORM** Shift Manager/ED.

2.2.2 IF Off-Site Communicator directed to initiate Notification Report from Emergency Off-Site Facility (EOF),
THEN PERFORM Attachment 3.



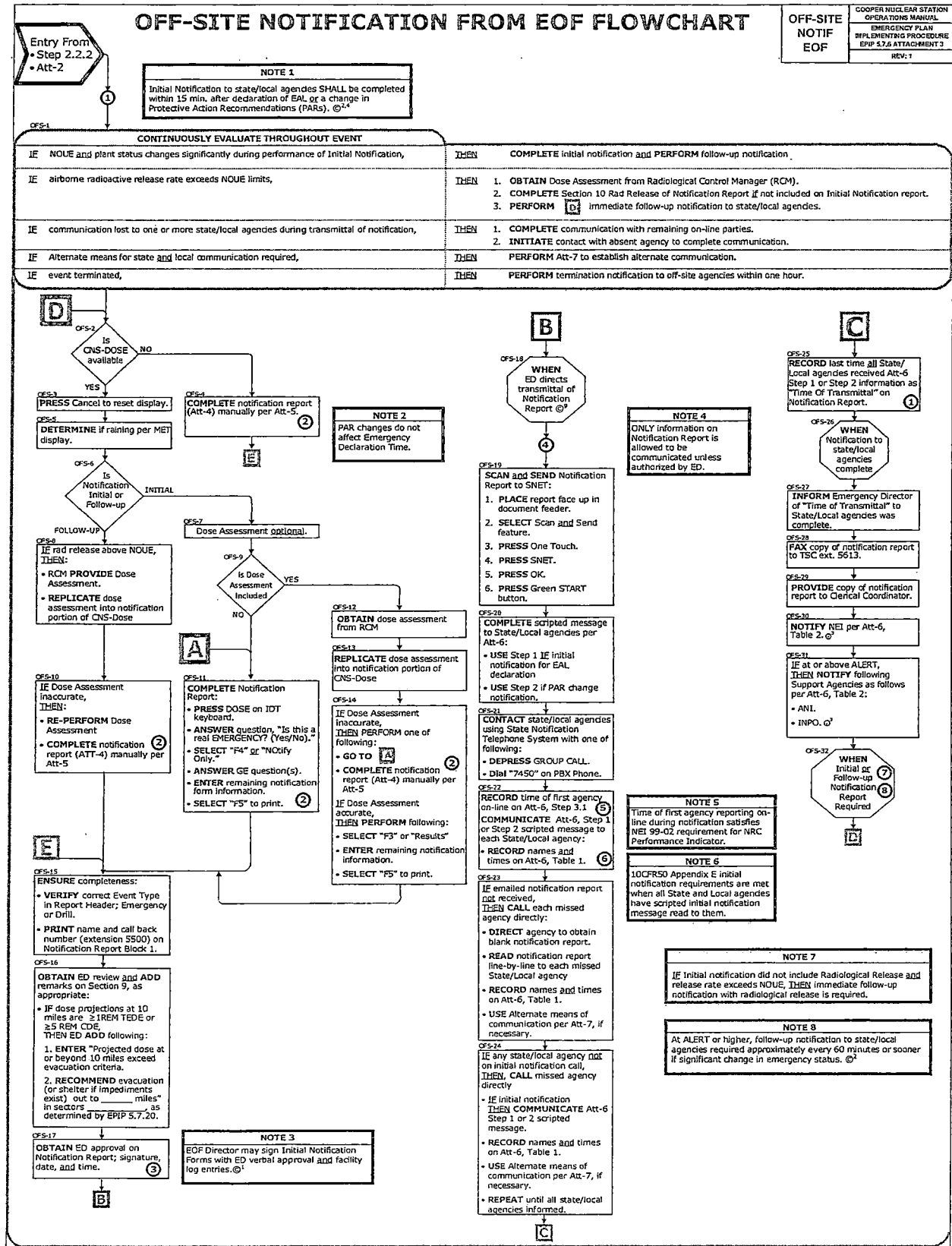
EOF OFF-SITE COMMUNICATOR FLOWCHART

OFF-SITE COMM	COOPER NUCLEAR STATION OPERATIONS MANUAL
	EMERGENCY PLAN IMPLEMENTING PROCEDURE
	EPIP 5.7.6 ATTACHMENT 2
	REV: 0



ATTACHMENT 3 OFF-SITE NOTIFICATION FROM EOF FLOWCHART (REFERENCE USE)

ATTACHMENT 3 OFF-SITE NOTIFICATION FROM EOF FLOWCHART (REFERENCE USE)



PROCEDURE 5.7.6

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ATTACHMENT 4 COOPER NUCLEAR STATION NOTIFICATION REPORT (INFORMATION USE)©⁵

1) <input type="checkbox"/> Emergency		<input type="checkbox"/> This is a Drill		
2) Notification Report Number: _____		Time of Transmittal: _____		
<input type="checkbox"/> Initial Report (Complete Sections 1-7 only)		<input type="checkbox"/> Follow-Up Report		
3) Name of CNS Communicator: _____		Call Back Number: 402-825-		
4) Classification: <input type="checkbox"/> NOUE; <input type="checkbox"/> Alert; <input type="checkbox"/> Site Area; <input type="checkbox"/> General		EAL Number: _____		
Event Declared (Date/Time): _____		Event Terminated (Date/Time): _____		
5) Meteorological Conditions	Wind Speed: _____ MPH	Wind From: _____ Degrees	Precipitation: <input type="checkbox"/> YES; <input type="checkbox"/> NO	
Stability Class: <input type="checkbox"/> A; <input type="checkbox"/> B; <input type="checkbox"/> C; <input type="checkbox"/> D; <input type="checkbox"/> E; <input type="checkbox"/> F; <input type="checkbox"/> G				
6) NOUE Airborne Release Values: There <input type="checkbox"/> is <input type="checkbox"/> no Release of Radioactive Material Greater than NOUE Limits.				
ERP = 2.24E5 μ Ci/sec		<input type="checkbox"/> was <input type="checkbox"/> an airborne		
TG Building = 9.02E4 μ Ci/sec		<input type="checkbox"/> will be <input type="checkbox"/> a liquid		
RX Building = 8.48E4 μ Ci/sec				
ARW Building = 9.08E4 μ Ci/sec				
7) Protective Action Recommendations (PARS): General Emergency Automatic PAR - Evacuate 2 mile radius/5 mile downwind, go indoors, and monitor EAS remainder 10 mile EPZ.				
	None	<input type="checkbox"/> Evacuate Sectors <input type="checkbox"/> Shelter Sectors	Go indoors and monitor EAS in Sectors	
0-2 Miles				
2-5 Miles				
5-10 Miles				
8) Prognosis: <input type="checkbox"/> Stable; <input type="checkbox"/> Unstable		Plant Status: <input type="checkbox"/> at Power; <input type="checkbox"/> Shutdown		
9) Remarks:				
10) Release Information (required on follow-up notification with airborne release > NOUE limits):				
Release From: <input type="checkbox"/> ERP; <input type="checkbox"/> Reactor Building; <input type="checkbox"/> Turbine Building; <input type="checkbox"/> Aug Radwaste Building; <input type="checkbox"/> Other: _____				
Release Height: <input type="checkbox"/> 100 M (ERP); <input type="checkbox"/> 10 M (RB, TB, ARWB); <input type="checkbox"/> Other: _____ ft			Release Rate (μ Ci/sec)	
Estimated Duration: _____ (Hours)		Noble Gas: _____ μ Ci/sec		
Start Time: _____		Iodides: _____ N/A		
Stop Time: _____		Particulate: _____ N/A		
Distance From Plant	Projected Integrated Dose (Rem)		Projected Dose Rate (Rem/hr)	
	TEDE	CDE (Thyroid)	TEDE	CDE (Thyroid)
Site Boundary				
2 Miles				
5 Miles				
10 Miles				
Emergency Director Signature: _____		Date: _____	Time: _____	

1. **OBTAIN** blank copy of Attachment 4, Notification Report.

NOTE 1 – Initial Notifications: Step 2, Step 3, and Step 5 or 6 are required.

NOTE 2 – Follow-Up Notifications: Steps 2 through Step 5 or 6 are required.

NOTE 3 – Termination Notifications: Steps 2 through 2.4.4 and Step 5 or 6 are required.

2. Communicator **PERFORM** following to initiate Notification Report:

- 2.1 Section 1, **SELECT** Event Type:

- 2.1.1 **CHECK** if an Emergency (Actual Event) or This is a Drill.

- 2.2 Section 2, **RECORD** Notification Report information:

- 2.2.1 **RECORD** Notification Report number:

- 2.2.1.1 **ENTER** 1 or next sequential number if more than one report has been generated during event.

- 2.2.2 Time of Transmittal: **LEAVE** blank.

- 2.2.3 **SELECT** Initial or Follow-Up Report:

- 2.2.3.1 **CHECK** "Initial Report" for EAL classifications or change in PAR.

- 2.2.3.2 **CHECK** "Follow-Up Report" for all others, including termination.

- 2.3 Section 3, **RECORD** name of CNS Communicator.

- 2.3.1 **RECORD** call back number.

- 2.4 Section 4, **PROVIDE** Emergency Classification information.

- 2.4.1 **CHECK** Emergency Classification being declared.

- 2.4.2 **ENTER** EAL number (e.g., AU1.1).

NOTE – PAR changes do not affect Emergency Declaration Time.

2.4.3 **RECORD** event declared (Date/Time):

2.4.3.1 **ENTER** time and date of Emergency Declaration in military format (e.g., 1418).©⁵

2.4.4 **RECORD** Event Terminated (Date/Time) as applicable:

2.4.4.1 **ENTER** time and date of termination in military format (e.g., 1418).

2.5 Section 7, **RECORD** Protective Action Recommendations (PARs) as determined by EPIP 5.7.20.

2.5.1 **VERIFY** PAR includes previous PARs if they have changed.

2.5.2 IF EAL Classification is below GENERAL EMERGENCY (GE), **THEN PLACE** "ALL" in each of three rows in NONE column to indicate recommended PAR is NONE.

2.5.3 For any GE PAR:

2.5.3.1 **CHECK** appropriate box indicating if PAR is an Evacuation or Shelter PAR.

2.5.3.2 **ENTER** sectors in appropriate rows for distance from site.

2.6 Section 8, **SELECT** event Prognosis and Plant Status:

2.6.1 IF event is not likely to degrade, **THEN CHECK** "Stable".

2.6.2 IF event is degrading (e.g., RPV level is lowering or Containment Rad Monitors are trending upward), **THEN CHECK** "Unstable".

2.6.3 IF reactor is shutdown under all conditions, **THEN CHECK** "Shutdown".

2.6.4 IF reactor is not shutdown under all conditions (with or without boron), **THEN CHECK** "at Power".

3. Dose Assessor or Radiological Assessment Supervisor (RAS) in EOF if activated, **PERFORM** EPIP 5.7.16 and 5.7.17.1, as applicable, to complete following sections of notification report:
 - 3.1 Section 5, **RECORD** meteorological conditions obtained from hand calculated dose assessment method from EPIP 5.7.17.1.
 - 3.2 Section 6, **RECORD** Release Status information based on results from hand calculated release rate methods per EPIP 5.7.16.©¹¹
 - 3.2.1 IF release rate currently at or above NOUE limits, **THEN CHECK** "Is" to indicate a radiological release in-progress.
 - 3.2.2 IF release rate has lowered and is now less than NOUE limits, **THEN CHECK** "Was" to indicate that past radiological release occurred.
 - 3.2.3 IF release rate rising and expected to exceed NOUE limits, **THEN CHECK** "Will Be" to indicate anticipation of a radiological release.
 - 3.2.4 IF release rate currently or expected to remain below NOUE limits, **THEN CHECK** "No" to indicate no radiological release in-progress or expected at this report time.
 - 3.2.5 **SELECT** Release Type (Airborne/Liquid):
 - 3.2.5.1 IF release that is, was, or will be above NOUE limits is airborne, **THEN CHECK** "an airborne".
 - 3.2.5.2 IF release that is, was, or will be above NOUE limits is liquid, **THEN CHECK** "a liquid".

4. IF both of following conditions are met:

- Report is Follow-up Notification.
- Release of airborne radioactive material greater than NOUE limits is occurring or occurred during event.

THEN COMPLETE Section 10 as follows:

4.1 Release From:

4.1.1 **CHECK** release source(s) that was or is contributing to exceeding NOUE limits.

4.2 Release Height:

4.2.1 IF ERP release source was or is contributing to exceeding NOUE limits,
THEN CHECK "100 M".

4.2.2 IF any other building was or is contributing to exceeding NOUE limits,
THEN CHECK "10 M".

4.2.3 IF any other structure (e.g. tank, container, etc.) was or is contributing to exceeding NOUE limits,
THEN CHECK "Other".

a. **RECORD** height in feet for other release source, if applicable.

4.2.4 IF multiple releases are occurring and not affecting same sectors,
THEN CHOOSE height associated with release source that results in greatest dose.

4.3 Release Duration: **ENTER** expected duration.

4.3.1 IF duration is unknown,
THEN USE default of 4 hours.

4.3.2 Start Time: **ENTER** release start time (e.g., 1418).

4.3.3 Stop Time: **ENTER** release stop time if known; otherwise, **ENTER** "UNK".

4.4 Release Rate ($\mu\text{Ci}/\text{sec}$):

4.4.1 **OBTAIN** release rate from release source that was or is contributing to exceeding NOUE limits by hand calculated release rate determination per EPIP 5.7.16.

4.4.2 **ENTER** Noble Gas release rate in $\mu\text{Ci}/\text{sec}$.

4.5 Projected Integrated Dose (Rem) and Projected Dose Rate (Rem/hr):

4.5.1 **OBTAIN** TEDE and CDE Dose, and Dose Rates from hand calculated dose assessment per EPIP 5.7.17.1.

4.5.2 **ENTER** Projected Integrated Dose (Rem) TEDE and CDE (Thyroid) values for each distance from plant.

4.5.3 **ENTER** Projected Dose Rate (Rem/hr) TEDE and CDE (Thyroid) values for each distance from plant.

5. IF notification sent from Control Room,
THEN RETURN to Attachment 1, Step SC-15.

6. IF notification sent from EOF,
THEN RETURN to Attachment 3, Step OFS-15.

Notification Report Number: _____

1. IF notification is an initial notification for an EAL declaration,
THEN SCRIPT initial notification message as follows:

This is Cooper Nuclear Station. At Time _____, a(n)

Circle One: (Unusual Event, Alert, Site Area Emergency, General Emergency)

was declared on EAL _____.

2. IF notification is for change in Protective Action Recommendations,
THEN SCRIPT initial notification message as follows:

This is Cooper Nuclear Station. At Time _____, a Change to
Protective Action Recommendations was issued for General Emergency
declared under EAL _____.

The change in Protective Action Recommendations is as follows: _____

Reason for change is due to: _____

3. STATE AND LOCAL AGENCIES

3.1 **RECORD** first State or Local agency on-line (Time): _____

AGENCY	PHONE	NAME	TIME
Nebraska Emergency Management Agency (NEMA) <u>or</u> Nebraska State Patrol	8511		
Nemaha County EOC <u>or</u> Nemaha County Sheriff	8512		
Richardson County EOC <u>or</u> Richardson County Sheriff	8517		
Missouri State Emergency Management Agency (SEMA) <u>or</u> Missouri Highway Patrol	8515 8514		
Atchison County EOC <u>or</u> Atchison County 911 Center	8516 8513		

4. SUPPORT AGENCIES

AGENCY	PHONE	PERSON CONTACTED	TIME
INPO	(404) 290-3980 (AED) or (404) 290-3977 (ED)		
American Nuclear Insurers (ANI)	(877) 680-2644		
Nuclear Energy Institute (NEI)	(202) 739-8000 (Business Hours) or (703) 644-8805		

5. NRC HEADQUARTERS; N/A if NRC communications turned over to TSC ENS Communicator.

5.1 **PROVIDE** additional information to NRC in addition to that provided on Notification Report; examples may include:

- Reactor power and mode before/after emergency declaration.
- Reason for declaring emergency.
- Additional 10CFR50.72 categories that may be applicable.
- Status of notification to NRC Resident Inspector.
- Any off-site assistance that has been requested.
- News release being planned.

CNS TELEPHONE	ALTERNATE	PERSON CONTACTED	TIME
Dial # on Phone Sticker	ETD or Speed Dial - 10		

NOTE – Shift Communicator shall turn over NRC notification responsibilities to ENS Communicator in TSC and State/Local agency notification responsibilities to Off-Site Communicator in EOF before being released from Communicator duties.

6. SHIFT COMMUNICATOR TURNOVER TO TSC AND EOF

6.1 WHEN contacted by ENS Communicator in TSC,
THEN TRANSFER NRC notification responsibilities and **NOTIFY** SM/ED.

NAME OF ENS COMMUNICATOR	TIME

6.2 WHEN contacted by Off-Site Communicator in EOF,
THEN TRANSFER off-site notification responsibilities and **NOTIFY**
SM/ED.

NAME OF OFF-SITE COMMUNICATOR	TIME

6.3 Shift Communicator Signature: _____ Date: _____

6.4 **INFORM** Shift Manager that Off-Site and NRC communication responsibility have been transferred.

NOTE – SNET is an email address in NPPD Global Address Book for delivery of Notification Reports and other documents to State and Local agencies, and NRC Operations Center.

1. IF State Notification Telephone System is inoperable,
THEN PERFORM "Group Call" by dialing 7450 from any PBX extension.
2. IF individual agency contact is required,
THEN USE table below with following options:
 - **DIAL** 4-digit number using CNS PBX phone extension.
 - **DIAL** 10 digit number on any phone connected to an off-site phone system.
 - **DIAL** speed dial number from Shift Manager phone.

AGENCIES	CNS PBX #	EXTERNAL PHONE #	SM SPEED DIAL #
NEMA or Nebraska State Patrol	8511	402-471-4545	04
Nemaha County EOC or County Sheriff	8512	402-274-3298	20
Richardson County EOC or Sheriff	8517	402-245-2479	21
Missouri SEMA or Highway Patrol	8514 or 8515	573-751-1000	22
Atchison County EOC or 911 Center	8513 or 8516	660-744-6271	19

3. IF PBX/extensions are inoperable,
THEN USE Brownville Central Office (C.O.) lines from any of following to attempt communication:
 - Control Room.
 - TSC.
 - EOF.
 - JIC.

4. IF both State Notification Telephone System and commercial (normal) telephone system are inoperable or congested,
THEN USE Government Emergency Telephone System (GETS) cards located in following ERFs:
 - 4.1 Control Room (Shift Manager's cubicle).
 - 4.2 TSC (TSC Director).
 - 4.3 OSC (OSC Supervisor).
 - 4.4 EOF (EOF Director).
 - 4.5 JIC (JIC Director).

1. PURPOSE²©^{6,7}

- 1.1 Perform initial, follow-up, and termination emergency plan notifications to responsible State and Local governmental agencies, NRC notifications, and notifications to other off-site support agencies.

2. PRECAUTIONS AND LIMITATIONS

- 2.1 ED may not delegate decision to notify authorities responsible for off-site emergency measures.©³

3. DISCUSSION

- 3.1 All notifications and communications will be handled from Control Room (CR) until Technical Support Center (TSC) and Emergency Operations Facility (EOF) are activated.
- 3.2 During declared Emergency at CNS, Emergency notifications to State of Nebraska; State of Missouri; Atchison County, Missouri; and Nemaha and Richardson Counties in Nebraska are accomplished through State Notification Telephone System.
- 3.2.1 CNS State Notification Telephone System is conference-calling system. When handset to this hotline is picked up and "Group Call" button pushed, dedicated telephones will automatically ring at:
- Nebraska State Patrol and Emergency Management Agency EOC.
 - Missouri State Highway Patrol and Emergency Management Agency EOC.
 - Atchison County 911 Center and EOC.
 - Nemaha County Sheriff and EOC.
 - Richardson County Sheriff and EOC.
- 3.2.2 Utilization of law enforcement agencies and emergency services dispatch centers as initial points of contact provides for 24 hour coverage.
- 3.2.3 Once EOCs become operational, notifications may be made using extension lines at EOCs with concurrence between respective EOC and law enforcement/911 agencies.

- 3.3 Primary means of generating notification reports is through automated CNS-DOSE Program on PMIS.
- 3.3.1 CNS-DOSE combines the means to collect meteorological and radiological data as part of the notification report.
- 3.3.2 For Initial Notifications, Communicators use CNS-DOSE to generate a notification only report that includes meteorological data, but does not include radiological information.
- 3.3.3 CNS-DOSE provides option of generating notification only without radiological information such as release rates and dose assessment. Dose Assessor in Control Room or Radiological Assessment Supervisor (RAS) in EOF typically generate CNS-DOSE dose assessment printout with MET, RAD, and PAR information, as necessary.
- 3.3.4 CNS-DOSE gathers current available radiological and meteorological data from plant instrumentation to assess release conditions.
- 3.3.5 CNS-DOSE provides tutorial to guide user through questions and topics required to be filled-in as part of report.
- 3.4 Primary and backup communication systems are available. Backup communication methods are listed below:
- Alternate telephones: Alternate telephone numbers are listed in Emergency Telephone Directory.
 - National Warning System (NAWAS).
 - Base station radio.
 - Relay through third party.

3.5 Public Affairs Duty Officer (PADO) is notified by pager by CNS Automated Notification System and instructed to contact Control Room. Upon being contacted by PADO, Control Room will relay following information to PADO: ©¹⁰

- Emergency Classification.
- EAL Number.
- Time of EAL Classification.
- Brief description of event.
- Request telephone number in which PADO can be reached.

3.6 PADO functions are superseded by activation of Joint Information Center (JIC). JIC receives follow-up information from EOF.

3.7 Emergency Preparedness Coordinator (EPC) is responsible for coordinating news releases after notification and responding to Notification of Unusual Event (NOUE) by reporting to Control Room. Duties include following: ©⁸

- Assists Control Room in ensuring communication is established with the PADO per EPIP 5.7.23.
- Responsibility is for period immediately after declaration of NOUE and continues until responsibility is transferred to appropriate NPPD Corporate Communications Department personnel.
- Any news release generated during this period should be reviewed and approved by Emergency Director.

3.8 Authorized Representatives of Governors of Nebraska and Missouri may be represented in EOF and set up Forward Command Posts at some other location.

3.9 FLOWCHARTS ORGANIZATION

3.9.1 Shift Communicator Flowchart from Attachment 1 and Off-Site Notification from EOF Flowchart from Attachment 3 are each printed on 18 inch by 24 inch laminated sheet and mounted on foam board.

3.9.2 EOF Off-Site Communicator Flowchart from Attachment 2 is printed on 11 inch by 17 inch laminated sheet and mounted on foam board.

3.9.3 Header data for each flowchart will contain revision number.

3.9.4 Table below specifies current revision of each flowchart.

Flowchart	Revision Number
Attachment 1, Shift Communicator	Revision 1
Attachment 2, EOF Off-Site Communicator	Revision 0
Attachment 3, Off-Site Notification From EOF	Revision 1

3.9.5 It is not necessary that flowchart revision number be revised with each revision of this procedure.

3.9.6 If any flowchart is revised, then Attachment 8 is revised to reflect new flowchart revision data.

4. RECORDS

4.1 Attachments 4 and 6 from actual events shall be forwarded to EP Manager within 5 working days of their completion (quality record upon completion).

5. REFERENCES

5.1 CODES AND STANDARDS

5.1.1 10CFR50.

5.1.2 NPPD Emergency Plan for CNS.

5.2 PROCEDURES

5.2.1 Conduct of Operations Procedure 2.0.5, Reports to NRC Operations Center.

5.2.2 Emergency Plan Implementing Procedure 5.7.1, Emergency Classification.

5.2.3 Emergency Plan Implementing Procedure 5.7.20, Protective Action Recommendations.

5.2.4 Emergency Plan Implementing Procedure 5.7.23, Activation of the Joint Information Center (JIC).

5.3 MISCELLANEOUS

- 5.3.1 CNS Emergency Telephone Directory.
- 5.3.2 NCR 93-52.
- 5.3.3 NRC Inspection Report 89-35, Item 1.
- 5.3.4 NRC Inspection Report 94-11.
- 5.3.5 NRC Inspection Report 94-29, Item 1.
- 5.3.6 NRC RIS 2009-10.
- 5.3.7 NRC Safety Evaluation Report (SER), TAC Number ME0849 - ADAMS Accession Number ML100080231.
- 5.3.8 Nuclear Energy Institute (NEI) Document 99-01, Revision 5, Methodology for Development of Emergency Action Levels.
- 5.3.9 Nuclear Energy Institute (NEI) Document 99-02, Revision 7, Regulatory Assessment Performance Indicator Guideline.
- 5.3.10 QA Observation 93-05A.
- 5.3.11 QA Report 86-06.
- 5.3.12 RCR 2002-0181, Action 2, Require State/Local Notification within 15 minutes of PAR or change in PAR.
- 5.3.13 @¹ SOER 99-1, Addendum, Loss of Grid. Assure that off-site communication and notification capabilities are maintained under loss of grid conditions. Affects Attachment 5.
- 5.3.14 @² TIP Action Plan 5.2.2.1, Revision 1, Action 1. Major revision 6/28/02 to clarify Control Room tasks. Affects Attachment 8, Section 1.
- 5.3.15 @³ IER 13-10, Recommendation 11a. Notifying NEI at NOUEs or higher and INPO at ALERTs or higher. Affects Attachment 1, Steps SC-30 and SC-31, and Attachment 3, Steps OFS-30 and OFS-31.

5.4 NRC COMMITMENTS

- 5.4.1 ©¹ Commitment Numbers 921110-02-06 and NSD921204-10. Allow Facility Directors to sign initial Notification Forms with ED verbal approval and appropriate log entries. Commitment affects Attachment 3, Step OFS-17, Note 3.
- 5.4.2 ©² Commitment Number NLS980074-02. Response to IR 98-12 to include clarification of requirements for making follow-up off-site notifications in a timely manner. Commitment affects Attachment 1, Notes 1 and 10, and Attachment 3, Notes 1 and 8.
- 5.4.3 ©³ Commitment Number CNSS854100-01. EIPs will clearly state non-delegable authorities and responsibilities. Commitment affects Attachment 8, Step 2.1.
- 5.4.4 ©⁴ Commitment Number CNSS854100-03. Provide greater visibility of time requirements for notifying state and local governments within 15 minutes after declaration of an emergency. Commitment affects Attachment 1, Note 1, and Attachment 3, Note 1.
- 5.4.5 ©⁵ Commitment Number NLS8700649-02. Declaration time will be reflected in Notification Form used by Control Room Communicator. Commitment affects Attachment 4, Event Declared (Date/Time) block (not annotated to preclude confusion with Off-Site authorities) Attachment 4 and Attachment 5, Step 2.4.3.1.
- 5.4.6 ©⁶ Commitment Number 811217-01-06. An EIP has been written to ensure that appropriate local governments will be properly informed in the event of an emergency at Cooper Nuclear Station. Commitment affects Attachment 8, Section 1.
- 5.4.7 ©⁷ Commitment Number 811217-01-08. Facility (TSC, OSC, EOF) activation procedures, as well as a notification procedure, have been included in the revised EIPs. Commitment affects Attachment 8, Section 1.
- 5.4.8 ©⁸ Commitment Number 811217-01-16. The specific functional responsibilities and authorities for the role of the Emergency Planning Coordinator have been developed and will be discussed in the revised Emergency Plan and appropriate EIPs. Commitment affects Attachment 8, Step 3.7.

- 5.4.9 ©⁹ Commitment Number 820806-01-10. The CNS emergency organization will be revised to provide personnel to make calls for the Emergency Director at his direction. Commitment affects Step 2.2; Attachment 1, Step SC-18; and Attachment 3, Step OFS-18.
- 5.4.10 ©¹⁰ Commitment Number NLS8400261-01. The District will provide pagers for appropriate General Office personnel that are key to the off-hours notification of the Emergency Preparedness response team located in the corporate offices. The pagers will be activated by a single telephone call from the CNS Shift Supervisor or his designee. The appropriate sections of the CNS Emergency Plan, EPIPS, and General Office guidelines will be revised to include this alternate means of notification. Commitment affects Attachment 8, Step 3.5.
- 5.4.11 ©¹¹ Commitment Number NLS950004-01. Emergency Plan procedures will be revised to include the definition of a release as it relates to off-site notifications. Commitment affects Attachment 5, Step 3.2.