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Arizona Nuclear Power Project

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September 25, 1987
044-00672-DGY/JAS

Mr. John B. Martin, Regional Administrator
Office of Inspection and Enforcement
United States Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Dear Mr. Martin:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units I, II and III
Dockets Nos. STN 50-528 (License NPF-41)
STN 50-529 (License NPF-51)
STN 50-530 (License NPF-65)
1987 Annual Emergency Plan Exercise
File: 87-002-493

References: (1) Letter dated August 3, 1983, from J. B. Martin, NRC,
to E. E. Van Brunt, ANPP, regarding Emergency
Preparedness Exercises.

(2) ANPP Policy and Procedures Manual No. 7N409.09.00.

Attached for your review and comment are the Objectives and Extent
of Play for the 1987 PVNGS Annual Emergency Plan Exercise scheduled
for December 9, 1987. These Objectives and Extent of Play are submitted
pursuant to the above references.

The off-site elements of the Objectives and Extent of Play have been
coordinated among the cognizant state and local emergency response
agencies.

If you are in need of clarification or additional information, please
contact Dennis Yows at (602) 393-6280.

Very truly yours,

J. G. HaynesJ. G. Haynes
Vice President
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PROPOSED 1987 ANPP PVNGS EXERCISE OBJECTIVES (BY FACILITY)

ANPP/APS FACILITIES

A. Common to all Facilities

- Demonstrate adequacy of the Emergency Plan and Emergency Plan Implementing Procedures both in terms of management control of an emergency situation and workability of the procedures at all levels.
- Demonstrate ability to respond to an emergency situation initiated prior to normal day-shift hours.
- Demonstrate ability to activate ANPP/APS emergency response facilities in a timely fashion.
- Demonstrate ability to turn-over command and control, relieve the key participants in all facilities (with the exception of the Simulator Operations staff and the OSC) and assume responsibility in a competent and timely fashion.
- Demonstrate functional adequacy of the ANPP/APS emergency response facilities, including communications links and equipment.
- Demonstrate ability of key personnel to make timely and effective decisions with respect to a radiological emergency.
- Demonstrate methods established to maintain adequate security access control to emergency facilities.
- Demonstrate ability to maintain timely and accurate information on status boards.

B. Control Room (CR)/Satellite Technical Support Center (STSC)

- Demonstrate ability to assess plant conditions.
- Prior to TSC activation, demonstrate ability of Onshift Emergency Coordinator to classify events per EPIP-02.

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Proposed 1987 PVNGS Exercise Objectives

B. Control Room (CR)/Satellite Technical Support Center (STSC) (Continued)

- Prior to TSC/EOF activation, demonstrate ability to identify projected trends and potential consequences.
- Demonstrate ability to take corrective actions to control the situation and mitigate the consequences.
- Demonstrate ability to alert and notify PVNGS Emergency Response Personnel in a timely manner.
- Prior to EOF activation, demonstrate ability to make initial notifications to state and county agencies within 15 minutes of an emergency declaration and the NRC immediately thereafter.
- Prior to EOF activation, demonstrate ability to provide follow-up information as requested by offsite agencies.
- Prior to TSC/EOF activation, demonstrate ability to determine actual or potential onsite and offsite radiological conditions including performance of initial dose projections and preparations for deployment of field monitoring teams.
- Prior to EOF activation, demonstrate ability to make timely Protective Action Recommendations to offsite agencies.
- Demonstrate ability to effectively transfer responsibilities from the Onshift Emergency Coordinator to the Onsite Emergency Coordinator and inform the Emergency Response Organization per EPIP-11.
- Demonstrate the ability to maintain a timely and accurate log of events.

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Proposed 1987 PVNGS Exercise Objectives

C. Technical Support Center (TSC)

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- Demonstrate ability to effectively transfer responsibilities from the Onshift Emergency Coordinator to the Onsite Emergency Coordinator and inform the Emergency Response Organization per EPIP-11
 - Demonstrate effective direction and control of onsite monitoring and repair teams.
 - Demonstrate ability to perform health physics practices including contamination control and routine habitability surveys.
 - Demonstrate ability to receive and analyze onsite/inplant radiological data.
 - Demonstrate capability of the Onsite Emergency Coordinator to classify events per EPIP-02.
 - Demonstrate ability to obtain adequate plant documents, drawings, plans and procedures in support of CR activities.
 - Demonstrate capability to staff and maintain a manpower roster for protracted operations, ensuring sufficient personnel have been activated and a 24-hour schedule is developed.
 - Demonstrate ability to manage onsite emergency response functions, emergency maintenance, safety and hazards control, engineering/technical analysis, radiation protection and reactor analysis.
 - Demonstrate ability to establish and maintain communications with the NRC regarding health physics and operations.

D. Operations Support Center (OSC)

- Demonstrate effective command and control of OSC personnel by the OSC Coordinator.
- Demonstrate ability of the OSC Coordinator to effectively communicate with the TSC on team assignment and status.

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Proposed 1987 PVNGS Exercise Objectives

D. Operations Support Center (OSC) (Continued)

- Demonstrate effective assembly and dispatch of implant monitoring, repair and chemistry teams in a timely manner.
- Demonstrate ability to implement personnel dosimetry for emergency response personnel.
- Demonstrate proper utilization and operation of self-contained breathing apparatus (SCBA) or other respiratory protection by emergency teams.
- Demonstrate ability to gather samples and analyze them in a mobile radiological laboratory setting (RERV).
- Demonstrate capability to perform contamination control, habitability surveys and maintain doses ALARA.

E. Emergency Operations Facility (EOF)

- Demonstrate capability to staff and maintain a manpower roster for protracted operations, ensuring sufficient personnel have been activated and a 24-hour schedule is developed.
- Demonstrate ability to maintain awareness of plant conditions, projected trends and potential consequences.
- Demonstrate ability to notify state and county agencies within 15 minutes of an emergency declaration.
- Demonstrate ability to provide follow-up information to offsite agencies.
- Demonstrate ability to make timely Protective Action Recommendations (PAR's) to offsite agencies.
- Demonstrate ability to direct offsite field monitoring teams for the purposes of tracking plume passage.

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Proposed 1987 PVNGS Exercise Objectives

E. Emergency Operations Facility (EOF) (Continued)

- Demonstrate ability to perform onsite and offsite dose assessment and projections in a timely manner.
- Demonstrate ability of the Emergency Operations Director to coordinate onsite and offsite emergency response activities.
- Demonstrate ability to provide approved information on inplant and onsite conditions/activities for release to the media/public.

F. Corporate Emergency Center (CEC)

- Demonstrate adequacy of the Corporate Emergency Procedures, both in terms of management control and workability of the procedures for the CEC.
- Demonstrate ability to coordinate corporate technical and manpower resources in support of an emergency situation.
- Demonstrate coordination of all financial and legal matters related to an emergency situation.
- Demonstrate ability to formulate and transmit to the JENC APS policy statements relating to the emergency.

OFFSITE OBJECTIVES (State of Arizona, Maricopa County)

A. Evaluated Objectives

- Demonstrate ability to respond to an emergency situation initiated during non-working hours, unannounced.
- Demonstrate ability to fully staff facilities and maintain staffing around-the-clock by:

Demonstrating ability to activate offsite emergency response facilities in a timely manner.

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Proposed 1987 PVNGS Exercise Objectives

A. Evaluated Objectives (Continued)

Demonstrating ability to turn-over direction and control of operations by relieving the shift of key participants in all facilities and the relieving shift's assumption of responsibility in a competent and timely manner.

B. Non-Evaluated Objectives (Previously Demonstrated -- Training Only)

- Demonstrate functional adequacy of the emergency response facilities and equipment.
- Demonstrate ability to continuously monitor and control emergency worker exposure.
- Demonstrate appropriate equipment and procedures for determining ambient radiation levels.
- Demonstrate appropriate equipment and procedures for measurement of airborne radioiodine concentrations as low as $1\text{E-}7$ uCi/cc in the presence of noble gases.
- Demonstrate ability to project dose to the public via plume exposure, based on plant and field data, and to determine appropriate protective measures based upon: PAG's, available shelter, evacuation time estimates and all other appropriate factors.
- Demonstrate effective assembly, dispatch and control of field monitoring teams.

C. Supplemental Offsite Objective

- Demonstrate adequacy of equipment and procedures for decontamination of emergency workers, equipment and vehicles. (Objective will be demonstrated without actual decontamination unit deployment - components will be shown to evaluators and procedures explained.)

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Proposed 1987 PVNGS Exercise Objectives

JOINT EMERGENCY NEWS CENTER OBJECTIVES (State, County and ANPP/APS)

- Demonstrate ability to communicate with all appropriate locations, organizations and personnel.
- Demonstrate adequacy and workability of the Joint Public Information Procedures.
- Demonstrate timely development and release of information to the media/public through coordinated actions by state, county and utility representatives.
- Demonstrate ability to brief the media in a clear, accurate and timely manner.
- Demonstrate ability to establish and operate a rumor control group in a coordinated manner.

PVNGS 1987 Exercise Proposed Extent of Play

Activation of all Emergency Response Facilities (ERF's) in accordance with plans and procedures.

- PVNGS Unit 3 Control Room and STSC (activities to be performed in the Simulator), TSC, OSC, EOF and CEC.
- State EOC/TOC including:
 - Public Inquiry Center
 - Joint Emergency News Center
 - Maricopa County EOC
 - Arizona Radiation Regulatory Agency (ARRA)
 - REAT Center
 - REAT Forward
 - Maricopa County Sheriff's Office (MCSO) On-Scene Command Post
 - Reception and Care Center (1)
 - Demonstrate capability to establish sleeping arrangements for evacuees.
 - Demonstrate capability to monitor evacuees for contamination.

Response

- Use of Notification Alert Network (NAN)
- Demonstrate ability to alert government response organizations.
- Mobilize state and county response agencies.
- Deploy state and county response organization.
- Evacuation of representative resident group (25 to 30 individuals).
- Evacuation of representative resident group with special needs (approximately 2-3 individuals).

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PVNGS Proposed 1987 Exercise Extent of Play

Response (Continued)

- Road Block/Access Control Points (2)- demonstrate function, then secure.
- Radiation Field Monitoring Teams (3' utility, 3 government).
- Use of primary and backup communications links as required by the exercise.
- Use of the Offsite Siren Activation System will be SIMULATED. Siren sounding will not occur, EBS messages will be generated and distributed, but not broadcast. The warnings will be disseminated among the exercise participants through the supplemental warning team.
- The siren portion of the PVNGS Site Warning Siren/Public Address System will be SIMULATED. The public address portion of this system will be used.
- Onsite Evacuation, Assembly and Accountability will be simulated.
- One (1) of the onsite monitoring teams will demonstrate the donning and removal of protective clothing before going into the field. All other teams will simulate the use of protective clothing.
- Inplant teams will don protective clothing as appropriate to the scenario, with at least one (1) team demonstrating the use of self-contained breathing apparatus (SCBA).

