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SUBJECT: Forwards Rev 3 to Emergency Procedure PEP-101, "Emergency Classification & Initial...."
Revised 12-6-88 m.w.

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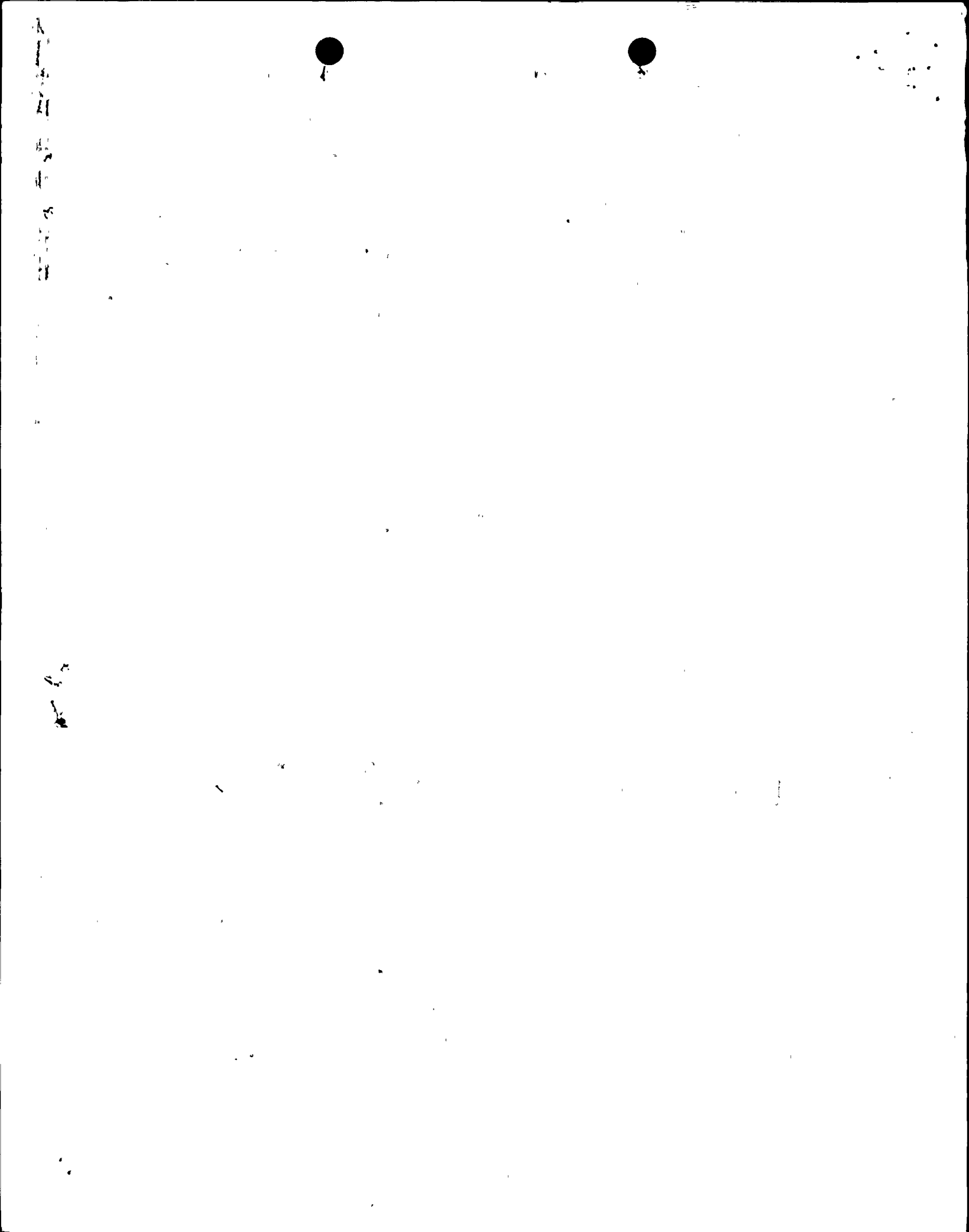
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Carolina Power & Light Company

NOV 14 1988

HARRIS NUCLEAR PROJECT
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NRC-649

CAROLINA POWER AND LIGHT COMPANY
SHEARON HARRIS NUCLEAR POWER PLANT
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Gentlemen:

In accordance with 10CFR50, Appendix E, Carolina Power & Light Company hereby transmits one copy of Shearon Harris Nuclear Power Plant emergency procedure, PEP-101, Revision 3, Emergency Classification and Initial Emergency Actions. With the approval of PEP-101, Revision 3, implementation of Revision 14 to the Emergency Plan (PLP-201) has been completed. Training on the new Emergency Action Level Flow Paths was provided to operators and to persons filling the positions of Emergency Response Manager, Site Emergency Coordinator, and Accident Assessment Team Leader during the period from September 29, 1988, until October 27, 1988.

Very truly yours,

R. A. Watson
Vice President
Harris Nuclear Project

MGW:lem

Attachment

cc: Mr. W. H. Bradford (NRC)
Mr. B. C. Buckley
Mr. M. C. Ernst (NRC) (w/two copies of procedures)

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CAROLINA POWER & LIGHT COMPANY
SHEARON HARRIS NUCLEAR POWER PLANT

PLANT OPERATING MANUAL

VOLUME 2

PART 5

SD-400

Shannon HARRIS

PROCEDURE TYPE:

PLANT EMERGENCY PROCEDURE (PEP) LTR DTD, 11-14-80

NUMBER:

PEP-101

Superseded per Rev. to
Emergency Procedure
PEP-101

TITLE:

EMERGENCY CLASSIFICATION AND
INITIAL EMERGENCY ACTIONS

REVISION 2

APPROVED:

J. L. Willis
Signature

2/6/86
Date

TITLE:

J. L. WILLIS, PLANT GENERAL MANAGER

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TABLE OF CONTENTS

	<u>Page</u>
Table of Contents	2
List of Effective Pages	3
1.0 PURPOSE	4
2.0 REFERENCES	4
2.1 Emergency Plan References	4
2.2 Referenced Plant Emergency Procedures	4
2.3 Other References	4
3.0 RESPONSIBILITIES	5
3.1 Authority	5
3.2 Relief of Position	5
3.3 Designated Alternates	5
3.4 Duties	5
4.0 DEFINITIONS	5
5.0 GENERAL	6
6.0 INITIATING CONDITIONS	6
7.0 PRECAUTIONS AND LIMITATIONS	6
8.0 SPECIAL TOOLS AND LIMITATIONS	7
9.0 PROCEDURE STEPS.	7
10.0 DIAGRAMS AND ATTACHMENTS	8
1. Emergency Action Level Network	9
2. Emergency Action Level Flowpath	10
3. Fission Product Barrier Status Indications	11



List of Effective Pages

<u>Page</u>		<u>Revision</u>
1 - 2		2
3	AC 2/1 through	AC 2/9
4		AC 2/2
5		AC 2/6
6 - 7		2
8	AC 2/1,	AC 2/7
8a		AC 2/7
9		AC 2/5*
10	AC 2/2,	AC 2/8
11		AC 2/4
12	AC 2/3,	AC 2/4
		AC 2/3

AC
2/9

* AC 2/5 consolidates AC 2/2 on page 9.



1.0 PURPOSE

The purpose of this procedure is to implement Section 4.1 of the SHNPP Emergency Plan, "Emergency Classification," which is a regulatory commitment. It also implements corrective actions in response to NRC Emergency Preparedness Appraisal Report Number 50-400/85-09. This procedure is to be used by the Shift Foreman or his designated alternate in the Control Room upon recognition of an off-normal condition (as determined by direction from another procedure, instrument readings, direct observation, or reported events) to assist in determining whether an event should be categorized as an emergency.

Once implemented, this procedure shall remain in effect until either:

1. An emergency is declared in accordance with an Emergency Action Level.
2. The determination has been made by the Shift Foreman, or his designated alternate, that an emergency action level has not been exceeded.

2.0 REFERENCES**2.1 Emergency Plan References**

1. Section 4.1, "Emergency Classification"

2.2 Referenced Plant Emergency Procedures

1. PEP-102, "Site Emergency Coordinator - Control Room"
2. PEP-103, "Site Emergency Coordinator - Technical Support Center"
3. PEP-301, "Notification of Non-CP&L Emergency Response Organizations"
4. PEP-403, "Performance of Training"

2.3 Other References

1. AP-036, "Significant Event (Red Phone) Reports"
2. AP-615, "NRC Reporting Requirements"
3. EOP-CSFST, "Critical Safety Function Status Trees"
4. ERC-109, "Reports and Notification"
5. SP-017, "Reporting of Physical Security Events"
6. Nuclear Regulatory Commission Inspection Report Number 50-400/85-09.

AC 2/2
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7. NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."

3.0 RESPONSIBILITIES

3.1 Authority

The Shift Foreman on duty (or his designated alternate) has immediate and unilateral authority to initiate and conduct this procedure. He may delegate specific steps as necessary, but shall not delegate the final classification decision.

3.2 Relief of Position

The Shift Foreman may be relieved by a designated alternate trained (in accordance with procedure PEP-403) to conduct this procedure.

3.3 Designated Alternates

In order of succession, the designated alternates for the Shift Foreman are as follows:

1. Roving Senior Control Operator
2. Control Room Senior Control Operator

3.4 Duties

Until an emergency is declared, the Shift Foreman has the following responsibilities relating to the Emergency Plan:

1. Direct the activities of the Control Room staff.
2. Recognize an off-normal condition as indicated by instrument readings or observation.
3. Implement any Emergency Operating Procedures, Abnormal Operating Procedures, and Fire Protection Procedures as appropriate.

4.0 DEFINITIONS

1. Fission Product Barrier - The fuel cladding, reactor coolant system boundary, or the containment boundary.
2. Fission Product Barrier Status -
 - a. Breached - The fission product barrier is incapable of sufficiently retaining radioactive materials to protect the public.
 - b. Jeopardy - conditions exist that are likely to result in fission product barrier breach, but the barrier is intact at the present time.

AC 2/6



11
12
13
14

15

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17

2.3 Other References (continued)

6. Nuclear Regulatory Commission Inspection Report Number 50-400/85-09.
7. NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."

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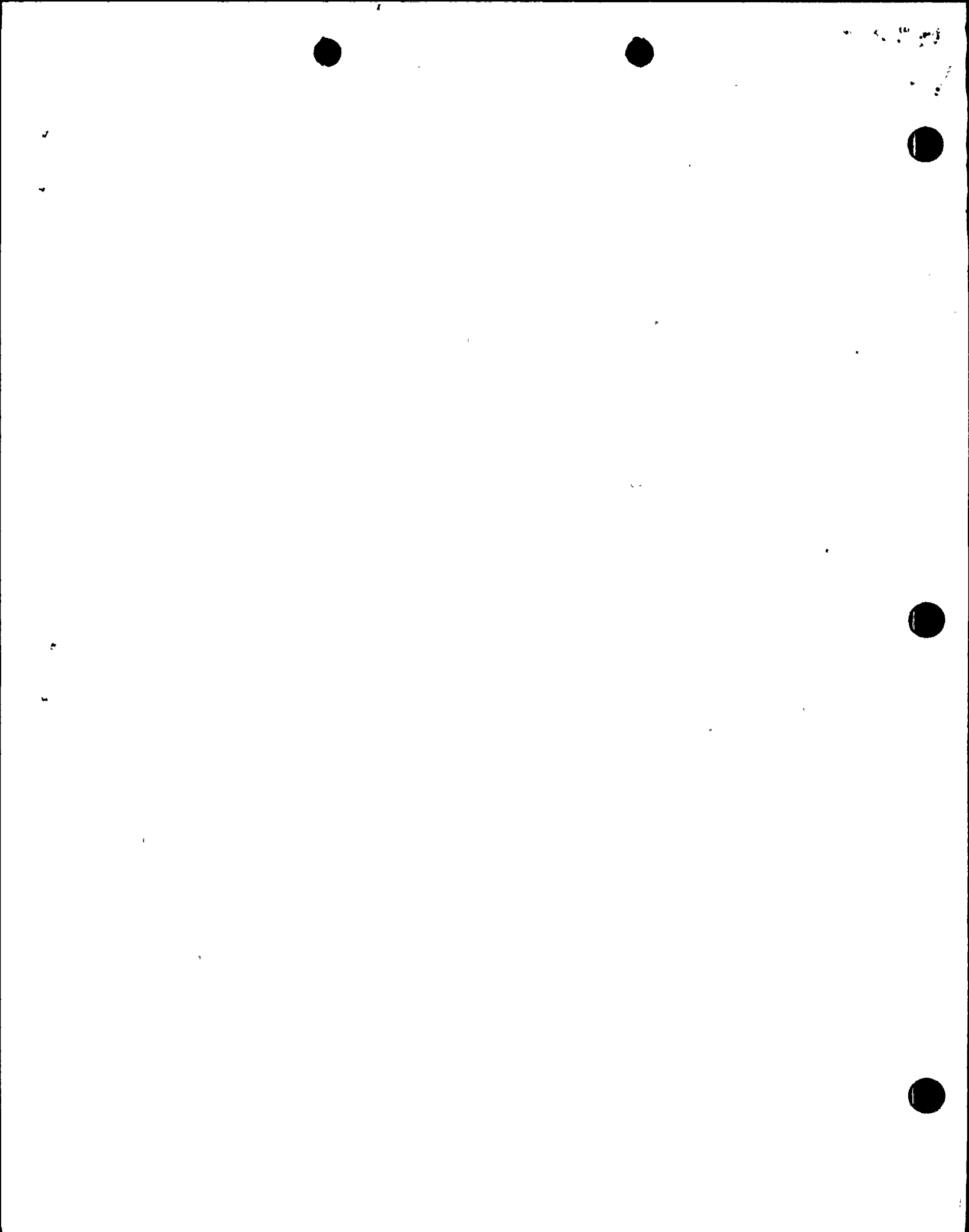
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3. Implement any Emergency Operating Procedures, Abnormal Operating Procedures, and Fire Protection Procedures as appropriate.

4.0 DEFINITIONS/ABBREVIATIONS

1. Fission Product Barrier - The fuel cladding, reactor coolant system boundary, or the containment boundary.
2. Fission Product Barrier Status -



- c. Intact - the fission product barrier retains the ability to protect the public from a harmful release of radioactive materials.
- 3. Site Emergency - same as "Site Area Emergency" as defined in NUREG-0654
- 4. Unusual Event - same as "Notification of Unusual Event" as defined in NUREG-0654

5.0 GENERAL

None Applicable

6.0 INITIATING CONDITIONS

- 1. Entry into the Emergency Action Level network has been directed by any of the Emergency Operating Procedures, Fire Protection Procedures, Abnormal Operating Procedures, or any other procedure.

OR

- 2. A Critical Safety Function Status Tree on the Safety Parameter Display System has produced a red or magenta output.

OR

- 3. Notification has been received from the Senior Member of the Security Organization, or his designee that a "Security Alert" or "Security Emergency" has been initiated.

OR

- 4. Conditions exist which, in the judgement of the Shift Foreman, could be classified as an emergency.

7.0 PRECAUTIONS AND LIMITATIONS

- 1. Implementation of this procedure does not constitute an emergency. This procedure serves as a guideline to assist in comparison of plant conditions with Emergency Action Levels to evaluate whether an emergency should be declared.
- 2. The highest emergency class for which an Emergency Action Level is currently met should be declared. If an action level for a higher classification was exceeded but the indicated level currently has abated or the situation has been resolved, the higher classification should be reported to the state, county, and Nuclear Regulatory Commission in accordance with PEP-301, but should not be declared. The notification must indicate the current classification, the period(s) of time that the higher classification existed, and the mitigating conditions that caused the emergency classification to be down-graded.
- 3. Priority should be placed on saving lives and/or preventing excessive exposure to personnel over saving equipment or preventing the spread of contamination.



4. If the Nuclear Regulatory Commission Director of Site Operations is at the Control Room, Technical Support Center, or Emergency Operations Facility, he should be consulted before downgrading the emergency class.

8.0 SPECIAL TOOLS AND EQUIPMENT

None Applicable

9.0 PROCEDURE STEPS

1. Direct the senior on-site member of the security force to begin printing the Sheltering Assignments/Assembly Area Log which shows personnel currently on-site broken down by assigned Shelter/Assembly Areas.
2. Enter the Emergency Action Level Network, Attachment 1, at the appropriate point:
 - a. If you were directed to enter the network by another plant procedure, enter at the point specified by that procedure.
 - b. If you are entering the network because a Critical Safety Function Status Tree on the Safety Parameter Display System has produced a red or magenta output, enter at point W.
 - c. In all other cases, enter at point X.
3. Proceed through the Emergency Action Level Network (Attachment 1) until the network directs you to either declare or not declare an emergency.
 - a. If the network directs you to "UPDATE CSF STATUS BOARD," enter the output color of each Critical Safety Function Status Tree (see EOP-CSFST) currently indicated on the Safety Parameter Display System in the data table provided on the network immediately below the instruction. Use the data in this table to answer subsequent questions in the network logic.
 - b. When the network directs you to "REVIEW ATTACHMENT 3", refer to Attachment 3, "Fission Product Barrier Status Indications" for guidance on additional monitor, chemistry and process indications that may be useful in detecting or confirming a breach condition.
 - c. When the network directs you to "UPDATE FPB-STATUS BOARD," enter the status of each fission product barrier in the data table provided on the network immediately below the instruction. If you entered the network at points T, U, or V, use the stated condition(s) for the entry point(s) and any additional breach conditions indicated by review of Attachment 3. If you entered at point W, use the conditions determined from the immediately preceding logic



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9.0 PROCEDURE STEPS (continued)

unless review of Attachment 3 indicates a breach condition for the same fission product barrier, in which case jeopardy should be changed to breach for that fission product barrier. If you entered the network at point X, use the fission product barrier status determined from review of Attachment 3.

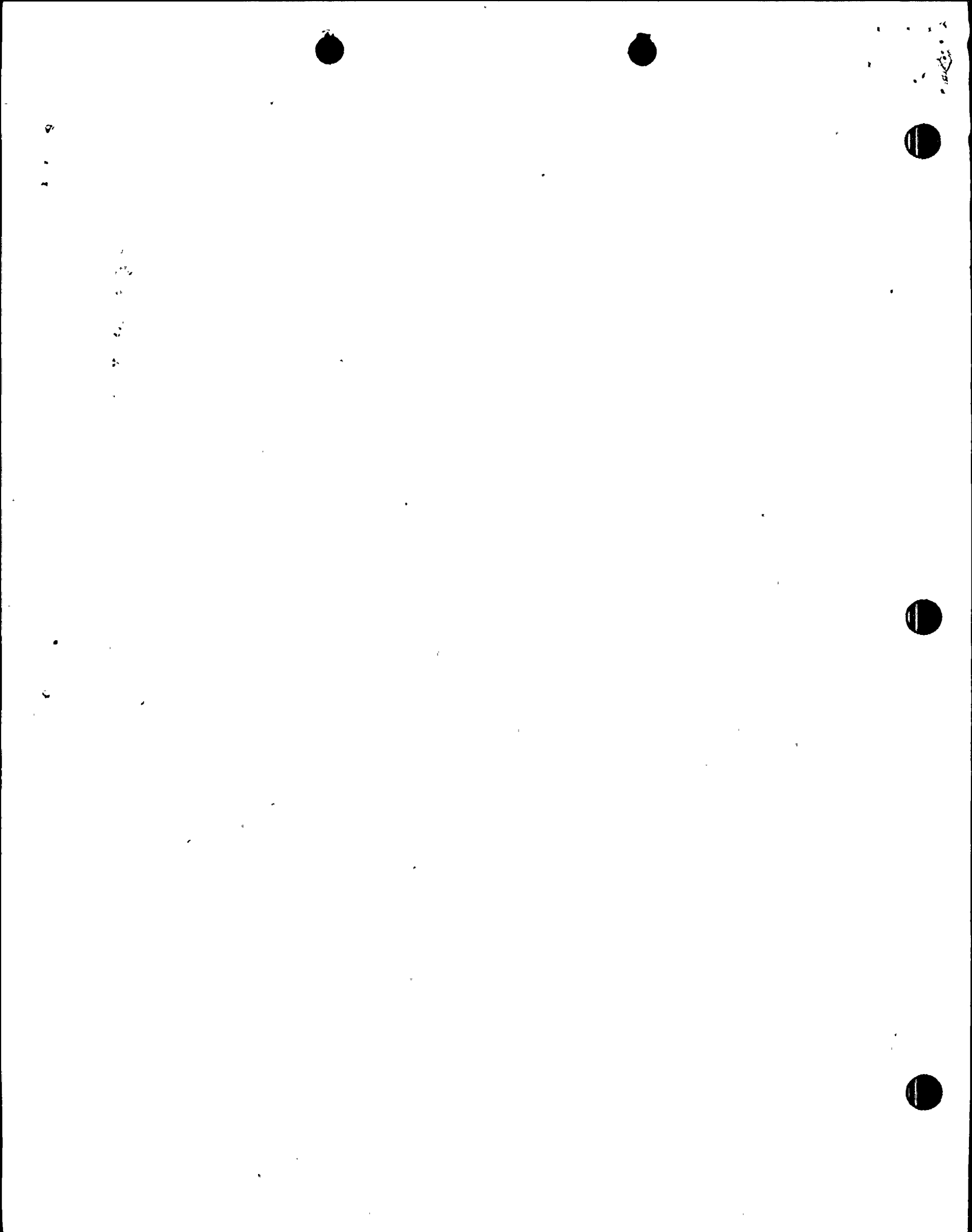
- d. If the answer to the network question "EAL FLOWPATH REVIEWED" is NO, enter the logic of Attachment 2, "Emergency Action Level Flowpath" at point Z. Proceed through the flowpath logic, reenter the network (Attachment 1) at point Y.
- e. Use the data entered in the fission product barrier tables and flowpath results to answer the subsequent network questions.
- f. If the network directs you to "EVALUATE AGAINST UNUSUAL EVENT MATRIX," proceed through the "Unusual Event Matrix" at the bottom of Attachment 1, then continue with the network.

NOTE: If off-site medical assistance is to be requested, notified or summoned to the site for an injured patient; and if the patient is contaminated per Section 4.0.3 of PEP-391 or the level of contamination cannot be determined or is unknown; then the patient is considered a "contaminated injured individual requiring off-site medical treatment" as listed in Attachment 1.

NOTE: Preplanned removal of ERFIS and SPDS from service for maintenance or modification purposes does not require declaration of an Unusual Event. In such case, notify the NRC Resident Inspector prior to removal from service and again when the ERFIS/SPDS is returned to service.

- g. If the network directs you to "DECLARE" any class of emergency, implement PEP-102, "Site Emergency Coordinator - Control Room," or PEP-103, "Site Emergency Coordinator - Technical Support Center," whichever is appropriate, and enter the time below that point on the Attachment.
- h. If the network result is "NO EMERGENCY DECLARED," consult AP-036, ERC-109, SP-017 and AP-615 to determine whether the condition constitutes a reportable event other than an emergency.

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2/7



4. If conditions dictate a continued evaluation or reevaluation of Emergency Action Levels, reenter the network at point W or at other points as directed by procedures and repeat Step 3.

NOTE: If the NRC Director of Site Operations is available, he should be consulted before downgrading an emergency classification.

10.0 DIAGRAMS AND ATTACHMENTS

1. Emergency Action Level Network
2. Emergency Action Level Flowpath
3. Fission Product Barrier Status Indications

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2/7

