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final Record

Chem-Nuclear Systems, Inc. ATTN: William B. House Director, Licensing 220 Stoneridge Drive Columbia, SC 29210

Gentlemen:

CConnell

09/04/90

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Subject: CNSI'S REQUEST FOR EXEMPTION FROM 10 CFR 30.32(h) AND 10 CFR 30.35 FOR BYPRODUCT MATERIAL LICENSE 39-23004-01

This letter is in response to your letter dated March 8, 1990, in which you requested an exemption from 10 CFR 30.32(h) and 10 CFR 30.35. Your request was reviewed by the Office of General Counsel and the Division of Low Level Waste Management and Decommissioning in the Office of Nuclear Material Safety and Safeguards, USNRC. It was determined that although License Number 39-23004-01 authorizes use at temporary jobsites and no CNSI facilities are directly involved and licensed materials possessed and used are transferred to other licensees on a project-by-project basis, the activities permitted under this license could result in contamination of facilities and equipment and, therefore, should not be exempt based on the information provided in your letter dated March 8, 1990.

If you wish to pursue applying for a license exemption, you would need to provide more information on the extent of possible contamination to facilities and equipment.

Currently License Number 39-23004-01 authorizes possession of materials in quantities that exceed the values in 10 CFR 30.35 and would require financial assurance. You have the option of submitting a cost estimate specific to your situation in which you may be able to demonstrate that your cost of decommissioning is less than the prescribed amounts in the regulations.

If you should have any questions, do not hesitate to contact me at (404) 331-2675.

Sincerely,

Carol Connell, Radiation Specialist Nuclear Materials Safety Section MAR 2 7 1990

Chem-Nuclear Systems, Inc. ATTN: Mr. William B. House Director, Licensing 220 Stoneridge Drive Columbia, SC 29210

Gentlemen:

This refers to your letter dated March 8, 1990, requesting an exemption from 10 CFR 30.32(h) and 30.32(i)(1) for Materials License 39-23004-01.

Your request is subject to an amendment fee of \$350 as specified in §170.31 (4B) of 10 CFR 170, copy enclosed. Payment should be made to the U.S. Nuclear Regulatory Commission and mailed to my attention at our Washington, D.C. address.

Your application will be processed by the Region II Licensing staff located at 101 Marietta Street, Suite 2900, Atlanta, Georgia 30323. The fee, however, is required prior to issuance of the amendment. When submitting the fee, please refer to CONTROL NUMBER 253306.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we shall assume that you do not wish to pursue your application.

Sincerely,

#### Signed by: Glenda Jackson

Maurice Messier License Fee and Debt Collection Branch Division of Accounting and Finance Office of the Controller

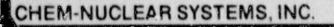
Enclosure: 10 CFR 170

cc: Region II

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220 Stoneridge Drive . Columbia, South Carolina 29210

April 27, 1990 RA-0279-90

Mr. Maurice Messier License Fee & Debt Collection Branch Division of Accounting & Finance Office of the Controller United States Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Messier:

This is in reference to your letter of March 27, 1990 concerning the Chem-Nuclear Systems, Inc. (CNSI) request for an exemption from 10 CFR 30.32(h) and 30.32(i)(1) for Materials License 39-23004-01.

Enclosed is our check No. 131179 in payment of the \$350.00 amendment fee in reference to Control Number 253306.

If you have any questions, please feel free to contact us.

Sincerely,

CHEM-NUCLEAR SYSTEMS, INC.

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William B. House Director, Licensing

WBH/rhs

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MAR 2 7 1990

Chem-Nuclear Systems, Inc. ATTN: Mr. William B. House Director, Licensing 220 Stoneridge Drive Columbia, SC 29210

Gentlemen:

This refers to your letter dated March 8, 1990, requesting an exemption from 10 CFR 30.32(h) and 30.32(i)(1) for Materials Liceuse 39-23004-01.

Your request is subject to an amendment fee of \$350 as specified in §170.31 (4B) of 10 CFR 170, copy enclosed. Payment should be made to the U.S. Nuclear Regulatory Commission and mailed to my attention at our Washington, D.C. address.

Your application will be processed by the Region II Licensing staff located at 101 Marietta Street, Suite 2900, Atlanta, Georgia 30323. The See, however, is required prior to issuance of the amendment. When submitting the fee, please refer to CONTROL NUMBER 253306.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we shall assume that you do not wish to pursue your application.

Sincerely.

#### Signed by: Glenda Jackson

Maurice Messier License Fee and Debt Collection Branch Division of Accounting and Finance Office of the Controller

Enclosure: 10 CFR 170

cc: Region II

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CHEM-NUCLEAR SYSTEMS, INC.

220 Stoneridge Drive . Columbia. South Carol: a 29210

March 8, 1990 RA-0193-90

Ms. Carol A. Connell Nuclear Materials Safety Division of Radiation Safety & Safeguards U.S. Nuclear Regulatory Commission Region II 101 Marietta Street Atlanta, Georgia 30323

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Dear Ms. Connell:

Chem-Nuclear Systems, Inc. (CNSI) provides the following response to your letter of September 8, 1989 which we received with our renewed License 39-23004-01 concerning the new requirement in 10 CFR 30.32(i)(1) for an emergency plan and the new requirements in 10 CFR 30.32(h) and 10 CFR 30.35 for the establishment of a decommissioning funding plan or certification of financial assurance for decommissioning.

License No. 39-23004-01 is utilized by Chem-Nuclear as a field project license for temporary job site use only. This license is typically used at a customer's facility for decontamination, waste processing, and packaging where the customer does not have the capabilities or authority for these activities. Radioactive materials utilized in conjunction with this license are not initially possessed by CNSI. Our typical approach is to enter a client's premises after an incident or planned removal of radioactive material, assess the situation, establish radiological controls as appropriate, and perform the necessary remediation activities.

The requirement for emergency plans for licensees who possess large quantities of radioactive materials is detailed in 10 CFR 30.32(1)(1). SI's corporate procedure CN-EM-001, Rev. F. "CNSI Emergency Response Procedure." (attached) is applicable to this license as indicated in previous submittels. We have evaluated the procedure against 10 CFR 30.32(1)(3) and with consideration of the capabilities and use of this license feel that the Information required in an emergency plan is contained in our procedure.

The regulations 10 CFR 30.32(h) and 10 CFR 30.35 set forth regulations for decommissioning funding. There are no radioactive materials routinely possessed under this license except at customer facilities. The licensed materials possessed and used under this license are transferred to other authorized licensees on a project-by-project basis. Since this is a temporary jobsite license, there are no facilities or equipment directly associated with it. Therefore, CNSI should not be required to set aside monies for decommissioning or provide a guarantee of the availability of funds for facilities involved in the use of this license.

253306



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Carol A. Connell page 2 of 2 March 8, 1990 RA-0193-90 ·\*\*. %

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In conclusion, for the reasons stated above, CNSI respectfully requests exemptions from both these new requirements in 10 CFR 30 for activities involving License 39-23004-01. If you have any questions, please feel free to contact me.

Sincerely.

CHEM-NUCLEAR SYSTEMS, INC.

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William B. House Director, Licensing

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1.0 SCOPE

#### 1.1 Purpose

The purpose of this document is to describe the implementation of a notification system for occurrences and a coordinated, preplanned response by Chem-Nuclear Systems (CNSI) personnel to an emergency involving the use of radioactive materials.

Notification of occurrences will be required to ensure that CNSI Corporate Management is aware of any problems and if necessary, takes the appropriate action: the CNSI Radiological Emergency Response Team (Team) is activated when required, and the requirements of Reference 2.1 have been followed.

Response to any real or potential emergency will be any action taken to minimize the consequences of the situation. The degree of response will be determined according to the magnitude of the incident. This may range from notification that additional response is unnecessary to the implementation of a large scale evacuation.

#### 1.2 Applicability

Procedures set forth in this document shall apply specifically to all CNSI employees and facilities. Yet, emergency situations may call for individuals other than CNSI employees to request the activation of the Emergency Response Team. Actual activation is the responsibility of an Emergency Team Leader.

#### 2.0 REFERENCES

- 2.1 CNSI Procedure, CN-AD-005, "Incident Reporting Procedure"
- 2.2 CNSI Procedure, RA-AD-OO1, "Required Notifications and Reports Following an Emergency."

#### 3.0 DEFINITIONS

- 3.1 Accident an unplanned event that endangers the health and safety of individuals, environment or equipment.
- 3.2 <u>Call Duty</u> is the assigned duty of a Team Leader requiring them to be available 24 hours a day for the assignment period, allowing Barnwell Site Security to make emergency notification. Coordinating locations and arranging a beeper system is recommended.
- 3.3 <u>Caller</u> the individual who contacts Barnwell Security with the initial notification of an occurrence. The caller will likely be the individual at or near the scene of the occurrence or a CNSI Supervisor.

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- 3.4 <u>Class A Emergency</u> The lowest ranked emergency for which response is required. A release of radioactive materials and/or increase in radiation levels are not apparent. See Appendix A for Class A situation and requirements.
- 3.5 <u>Class B Emergency</u> The middle ranked emergency in which a response is required. Minor radioactive material release and/or increase in radiation levels are apparent. See Appendix A for Class B situations and requirements.
- 3.6 <u>Class C Emergency</u> The highest ranked emergency in which a response is required. Lajor radioactive materials release and/or increase in radiation levels are apparent. See Appendix A for Class C situations and requirements.
- 3.7 <u>Emergency</u> an emergency or potential emergency is defined as any of the following occurrences:
  - 3.7.1 The loss or theft of radioactive material.
  - 3.7.2 An unathorized over-exposure of persons from sources of ionizing radiation or potential release of radioactive material.
  - 3.7.3 Transportation with a release or potential release of radioactive material.
  - 3.7.4 A potential radiological risk of sufficient magnitude to involve the following:
    - 3.7.4.1 Evacuation or control of the movement of people to minimize exposure to radiation
    - 3.7.4.2 Medical evaluation of individuals
    - 3.7.4.3 Release of radioactive materials which causes a potential risk to the public.
- 3.8 <u>Emergency Response Kits</u> The emergency response kits contain equipment and materials necessary for the Team to respond to the majority of emergencies involving radioactive material. These kits have been assembled as described in Step 4.1 of this document and are located in strategic locations as indicated in Step 4.3 of this document.
- 3.9 Incident Any occurrence which, after further review, study, or Uata input, is determined by Management of the Regulatory Affairs Department to have endangered the safety or health of Steps 3.11.1 thru 3.11.5, or is classified as having exceeded State, Federal, or Company radiological or chemical guidelines.
- 3.10 Events Occurrences that do not require a response. See Appendix A for event requirements.

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- 3.11 Occurrence A potential incident. Any condition or circumstance which could affect or has affected the degree of protection (i.e. release of radioactive material) provided to any of the following:
  - 3.11.1 Company personnel or co-workers from other firms.
  - 3.11.2 Visitors to any site of CNSI operation.
  - 3.11.3 The general public.
  - 3.11.4 CNSI facilities and equipment, and
  - 3.11.5 The environment in the vicinity of CNSI operations and an accident scene.
- 3.12 <u>Package</u> The radioactive material and its container. Containers include but are not restricted to casks, 55-gallon drums, shielding containers, or LSA boxes.

#### 4.0 REQUIREMENTS

#### 4.1 Tools, Materials, Equipment

The items listed in Appendix G shall be assembled and kept ready at all times at the Barnwell, South Carolina, facility in a location designated by the Health Physics Office. Items noted with an asterisk shall be kept ready at CNSI facilities specified in Step 4.3 of this procedure. Hereafter these tools, materials, and equipment will be referred to as the ER (emergency response) kits.

#### 4.2 Maintenance

#### 4.2.1 SRB Subcommittee

The Safety Review Board will establish a subcommittee to implement the duties as described in Step 5.3.

#### 4.2.2 ER Kit Coordinator

The maintenance of each ER kit will be coordinated by the the CNSI Transportation Department. The Transportation Department will designate an individual as the Emergency Response Coordinator for the maintenance of all the equipment. This coordinator shall designate individuals at each CNSI facility, as identified in Step 4.3 of this document, to perform the duties defined in Step 5.5.

# 4.3 The following CNSI Facilities will have emergency response capabilities:

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- 4.3.1 Barnwell, South Carolina
- 4.3.2 Columbia, South Carolina
- 4.3.3 Avon, Connecticut
- 4.3.4 Channahon, Illinois

#### 5.0 RESPONSIBILITIES

5.1 CNSI Management (SRB)

CNSI Management through the Safety Review Board (SRB), shall establish a radiological emergency response plan and team to ensure the public health and safety in the event of an occurrence involving radioactive material. The Safety Review Board shall ensure these responsibilities have been carried out by establishing an Emergency Response Subcommittee of the SRB. The SRB shall approve implementation of the procedures and formation of the team.

The Safety Review Board shall also ensure that the CNSI notification system is established with all affected persons, i.e customers, vendors, carriers, government and civil agencies.

#### 5.2 CNSI Employees

All CNSI employees shall make reports of occurrences according to Reference 2.1.

5.3 SRB Subcommittee

The Safety Review Board Subcommittee, hereafter referred to as the Emergency Response Subcommittee, will have the following responsibilities:

- 5.3.1 Prepare, review, and update the CNSI Emergency Response Plan for SRB approval.
- 5.3.2 Establish the Team and ensure replacement of team members that can no longer fulfill the duties.
- 5.3.3 Ensure team members are properly trained.
- 5.3.4 Coordinate at least one announced and one unannounced emergency response exercise each year. Coordinate the testing of the communication system, as necessary.
- 5.3.5 Exercise pager systems and ensure communications will work in the event of an emergency.

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#### 5.4 Barnwell Site Security (BSS)

Barnwell Site Security shall be prepared to:

- 5.4.1 Record the caller notification of an occurrence. incident, accident, and/or emergency on the "Report of Notification" form found in Appendix B;
- 5.4.2 Relay the recorded information to one of the Team Leaders listed in Appendix D;
- 5.4.3 Make notification to Regulatory Affairs and management according to Step 7.1 using the telephone numbers listed in Appendix C; and
- 5.4.4 In emergency situations stay by the telephone and make or answer telephone calls as directed by the Team Leader.

#### 5.5 Emergency Response Kit Coordinator

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The ER Kit Coordinator will ensure that an individual has been designated at each CNSI ER kit facility and that those individuals perform the following duties:

- 5.5.1 Inventory tools, materials, and equipment semi-annually to ensure nothing is missing.
- 5.5.2 Keep a list of radiation detection instruments and calibration dates. On a monthly basis, inspection to be sent to Emergency Response Coordinator by the 10th of the following month (Appendix H). Ensure instruments are sent to overall coordinator when calibration is due or arrange for local calibration.
- 5.5.3 Ensure all equipment is usable (i.e. flashlights, respirators, pens).
- 5.5.4 Ensure each ER team member at the respective facility knows where the equipment is being stored, has all of the necessary keys, and security clearance to access the equipment; and can make arrangements for emergency travel and accommodations.

#### 5.6 Emergency Response Team Organization

5.C.1 A team of trained CNSI facility personnel shall be prepared to perform one or more of the functions listed below. The Team Leader (ETL) for each CNSI facility shall be selected by the Safety Review Board. The ETL is responsible for filling all other team assignments as necessary. This team will be available for rapid mobilization should an emergency situation arrive. A list of qualified emergency team individuals to be assigned to the response team is found in Appendix D.

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5.6.2 Emergency Response Team Leader (ETL)

- 5.6.2.1 Assess and classify the severity of the emergency and initiate this plan. Determine status of the emergency and send advanced personnel to accident site as deemed appropriate. If possible, contact the original caller at the scene of the emergency to gather or update information and relay CNSI's response actions.
- 5.6.2.2 Assign qualified personnel to the Team and instruct them to proceed to a pre-response location or the emergency site and perform such actions as deemed necessary.
  - NOTE: AT ANY TIME DURING RESPONSE TO AN EMERGENCY THAT THE ETL IS OUT OF CONTACT (I.E. INTRANSIT), THE RESPONSIBILITY FOR COMMUNICATIONS WUST BE TRANSFERRED TO ANOTHER ETL, OR ETC, UNTIL THE RESPONDING ETL BECOMES AVAILABLE AGAIN AND TAKES CONTROL. BARNMELL SITE SECURITY MUST BE INFORMED OF ANY CHANGES TO THE COMMUNICATIONS CONTROL.
- 5.6.2.3 Coordinate emergency operations by maintaining communications with local civil authorities on the scene, authorities in the involved States on the scene, CNSI Regulatory Affairs, BSS, and the Team.
- 5.6.2.4 Assume supervision and control of the emergency and the Team either at the CNSI facility, the accident site, or alternate site as deemed appropriate.
- 5.6.2.5 Arrange transportation service for Team personnel as required (i.e., air transportation, pickup at airport by State Police, etc.).
- 5.6.2.6 Support Team at accident site by providing for additional assistance, equipment and/or relief of personnel as required.
- 5.6.2.7 ETL's may act as an ETC, 19 necessary.

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5.6.3 Emergency Response Team Field Coordinator (ETC)

- 5.6.3.1 Act as communications controller and direct the Team at the accident scene until relieved of duty by the ETL. Maintain communications with local accident site authorities, ETL, and caller.
- 5.6.3.2 Notify personnel assigned to the Team to report to a predetermined location for transportation to site of the emergency if so indicated by ETL.
- 5.6.3.3 ETC's may act as an ETHP, if necessary.
- 5.6.4 Emergency Response Team Health Physicist (ETHP)
  - 5.6.4.1 Report to site of occurrence or remain on standby as directed by the ETC.
  - 5.6.4.2 Evaluate radiological status of the accident and surrounding area.
  - 5.6.4.3 Provide ETC with a judgment of the significance or magnitude of any radiological hazard present.
  - 5.6.4.4 Coordinate surveys and activities with representatives of DOE radiological assistance teams and make recommendations in conjunction with DOE as to the appropriate form of protective action required.
  - 5.6.4.5 Assist in establishing radiological control over the affected area if required.
  - 5.6.4.6 Advise the ETC of conditions existing, actions taken, and present status so that ETL may be kept informed.

#### 5.6.5 Team Operator Personnel (ETO)

- 5.6.5.1 Take actions as directed by the ETC and other appropriate actions as required to stabilize the situation and protect individuals from injury and contamination.
- 5.6.5.2 Assist driver-technician as directed, if driver technician is present.

#### 6.0 TRAINING

The training program shall be recommended by the Emergency Response Subcommittee and approved by the Safety Review Board.

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- 6.1 Each Emergency Team Leader must be approved by the Safety Review Board. Approval will be based on previous experience and/or training.
- 6.2 ETL's must regularly update themselves on proper procedure, available support, and effective regulations.
- 6.3 Each Emergency Team Member must undergo an approved training course and test to document each member's qualification.
- 6.4 Each Team member must participate in at least one scheduled exercise or one unscheduled exercise each year to remain qualified. The Emergency Response Subcommittee will arrange and execute the exercises.

#### 7.0 NOTIFICATION

7.1 The Caller will notify Barnwell Site Security (BSS)

#### 803-259-1786

in accordance with Reference 2.1 (CNSI employee) or as witness or responder to an accident, occurrence, event or emergency. During this notification, the caller will be asked to provide as much information as possible. CNSI employees should be prepared to supply all the information requested on the Report of Notification (Appendix B) including a determination of whether the occurrence is an emergency as defined. Notification by a non-CNSI employee will always be defined as an emergency.

#### 7.2 Barnwell Site Security (BSS)

- 7.2.1 BSS shall record the callers notification on the Report of Notification (Appendix B).
- 7.2.2 BSS shall verify the telephone call is not a prank. As a minimum the contact number should be verified by calling.
- 7.2.3 If the occurrence is an emergency, BSS will call an Emergency Team Leader (ETL) by telephone or contact by the pager if unavailable by telephone. Any uncertainty of definition must be resolved by an ETL. If an ETL can not be reached, BSS shall contact an ETC or ETHP. The ETL shall classify the emergency and inform BSS of the classification.
- 7.2.4 BSS will notify Regulatory Affairs in accordance with Reference 2.1.
- 7.2.5 BSS will notify CNSI Management in accordance with the direction and list in Appendix C.

7.2.6 BSS will make any other notifications requested by the ETL.

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- 7.3 Regulatory Affairs
  - 7.3.1 After notification by BSS, if Regulatory Affairs determines that an occurrence not defined as an emergency should be so defined, Regulatory Affairs will direct BSS to notify the ETL.
  - 7.3.2 Regulatory Affairs will make all necessary notifications to the customers, shipper/owner/generator and Government Agencies and keep CNSI Management informed per Reference 2.2.

#### 7.4 Emergency Response Team

After notification by BSS, the ETL shall notify the appropriate number and type of Team Members.

7.5 Non-CNSI Support

Other emergency support, except State and Federal Agencies, may be notified by the ETL when deemed necessary. Non-CNSI support teams that may be of help are the local or State law enforcement, fire departments, rescue squads, and ambulance services.

7.6 State and Federal Agencies

State and/or Federal Agencies shall be notified by Regulatory Affairs when deemed necessary to support emergency response efforts per Reference 2.2.

The ETL may notify State or Federal emergency teams only when Regulatory Affairs Management cannot be reached.

#### 8.0 IMPLEMENTATION

#### 8.1 Barnwell Site Security Actions

BSS shall determine if the caller is trained in prevention of radiation exposure and the spread of contamination prior to relaying the following instructions.

- 8.1.1 Instructions to Untrained Caller
  - 8.1.1.1 Restrict area to 100 feet from truck, containers, or radioactive source until a radiation survey has been taken.
  - 8.1.1.2 Take care of the injured as necessary by using first aid and/or calling an ambulance service. In almost all emergency cases risking the spread of contamination and individual exposure is acceptable when serious or life-threatening injury is involved.

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- 8.1.1.3 Ensure that the emergency can be verified by the ETL and a communication system is available for further instructions and status reports.
- 8.1.1.4 Perform emergency actions as trained.
- 8.1.2 Verify that the call is not a prank. As a minimum verify the call by telephoning the number the caller has provided.

#### 8.2 Emergency Team Leader Action

The ETL shall take the following actions after notification of an emergency:

- 8.2.1 If possible, collect additional information, relay further instructions by telephoning the caller at the scene of the occurrence, and let caller know what action to expect from the Emergency Team.
- 8.2.2 Instruct BSS of the classification of emergency and additional notification to make.
- 8.2.3 Activate the Team as deemed necessary.
- 8.2.4 Establish a Team assembly point.
- 8.2.5 Make arrangements to gather the emergency equipment.
- 8.2.6 Instruct and dispatch selected emergency team members and equipment to the accident site or other point of rendezvous.
- 8.2.7 Notify local authorities that an emergency plan is in effect and that assistance is enroute. Make arrangements for pickup of CNSI personnel if required.
- 8.2.8 Coordinate emergency activities and keep CNSI Regulatory Affairs advised of the situation.
- 8.2.9 Advise the responsible party and request aid if necessary.

#### 9.0 ACCIDENT SCENE

Emergency actions are performed at the direction of the ETL or designee. The ETL may modify the following recommendations based on experience and training. A checklist is provided as Appendix E to assist the ETL/ETC in the response. If emergency response plans, such as Utility emergency plans or State County emergency plans, exist and are in action, the use of this procedure will be limited to administrative actions.

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#### 9.1 Arrival

Upon arrival at the accident scene, the emergency team shall establish contact, with local authorities and other emergency teams or individuals.

- 9.1.1 Evaluate the situation.
- 9.1.2 Determine if other hazards are involved or if special precautions are in force for entry to area.
- 9.1.3 Plan appropriate course of action before entering accident area.
- 9.2 Entry

General procedure for entry of area:

- 9:2.1 Personnel shall be equipped with personnel monitoring devices (dosimeters).
- 9.2.2 Enter accident area with radiation survey instruments in operation (any indication of radiation levels above normal background would suggest possible damage to shipment and release of contents).
- 9.2.3 Exercise judgment in the need to wear protective clothing and respiratory protection. Visually inspect shipment from a distance to determine if cargo leakage is apparent.

#### 9.3 Evaluation

- 9.3.1 Conduct radiation survey at perimeter of area and work in toward the vehicle. Normal maximum radiation levels at the vehicle are 10 mR/hr at 2 meters from the edge of the vehicle and/or 200 mR/hr at contact with the closed trailer, cask, or other large container.
- 9.3.2 If possible obtain documentation from vehicle concerning radionuclides, activities, and quantity of packages to help determine potential hazards.
- 9.4 Security
  - 9.4.1 Identify and post areas in accordance with the following:

ROPE OFF AND POST <u>"RADIATION AREA"</u> SIGNS IN ALL AREAS WHERE RADIATION LEVEL EXCEEDS 2 mR/HR OR WHERE THERE IS EVIDENCE OF SMEARABLE CONTAMINATION. POST <u>"HIGH RADIA-</u> TION AREA" SIGNS IN ALL AREAS WHICH EXCEED 100 mR/HR.

9.4.2 Obtain help from local authorities to enforce security of contaminated and radiation areas.

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9.4.3 If necessary, rope off an additional area further from the scene to constrain unauthorized persons.

#### 9.5 Protective Action

- 9.2.1 The degree of protective action depends on the severity and classification of emergency.
- 9.5.2 Visually inspect the scene of the accident from a reasonable distance for any apparent outward signs of damage and use the guide for protective action found in Appendix F.

#### 9.6 Clean-Up

- 9.6.1 Clean-up of the accident scene is the job of the Team only if the size, time, and expense of clean-up is of small enough proportion to be permitted.
- 9.6.2 A special Clean-up Team will be organized for major clean-ups of accident scenes. Major clean-ups will be arranged and approved by CNSI Management and reviewed by the Srfety Review Board. Members of the Team may be assigned to the clean-up team once the emergency has been controlled.

#### 9.7 Follow-Up

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- 9.7.1 The ETL shall report the radiological status to CNSI Regulatory Affairs and advise of protective action placed in effect or required.
- 9.7.2 The ETL shall report to CNSI Regulatory Affairs any physical damage and specify handling instructions if required.
- 9.7.3 If radiation and/or contamination is involved:
  - 9.7.3.1 Contact and monitor all persons who may have been exposed and/or contaminated (record names and addresses).
  - 9.7.3.2 Keep record of all actions, survey results, exposures, names of personnel involved, and contacts for formal report preparation.
- 9.7.4 A CNSI Team member shall remain in attendance until the shipment is either removed from its emergency status, restored to normal condition, and/or as instructed by ETL.

#### 10.0 RECORDS AND REPORTS

10.1 An incident report shall be submitted by the ETL in accordance with Reference 2.1.

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SHEET 15	
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- 10.2 Regulatory Affairs shall make any formal report or notifications as required by regulations per Reference 2.2.
- 10.3 The Emergency Team Leader will provide information to State and local officials on the scene only as needed. All information other than to the local or State on-the-scene officials shall be provided by CNSI Regulatory Affairs per Reference 2.2. Information to the press and public shall be made by CNSI Corporate Officials or their designee(s), only.

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APPENDIX A CLASSIFICATION OF EMERGENCIES (4 PAGES)

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Events are those notifications of incidents that do not need a response. It has been determined by qualified authority (State, Local, Federal agencies or another radiological Team) that there is no release of radioactive materials and/or no increase in radiation levels.

#### Minimum Personnel At Location

None. Individuals may respond, as determined by the Emergency Team Leader, to handle non-radioactive problems.

#### Minimum Equipment

None.

CN-EM-001, APPENDIX A PAGE 1 REV. 10/09/86

Class A emergencies are those incidents in which there is no apparent release of radiation, little if any non-radioactive clean-up, and no significant damage to the package.

#### Minimum Personnel At Location - Two

- 1. Team Leader or designee.
- 2. Team Health Physics.

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#### Minimum Equipment

One radiation detection device, appropriate to the type of radiation. Example: E520 geiger counter or PAC4G scintillator.

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Class B emergencies are those incidents in which at least one of the following situations (or similar situations) are present:

- There appears to be a minor release of radioactivity in the form of contamination or higher than expected radiation dose levels. For definition purposes minor release originating from limited quantity and DAW-LSA shipments.
- There appears to be significant damage to non-licensed packages.
- It appears that the radioactive clean-up can be accomplished with simple, hand-performed methods (rags, shovels, bags, anti-C).
- Significant non-radioactive hazards are present (fire, gasoline spill, chemical hazard, serious transportation accident).

#### Minimum Personnel At Location - Four

- 1. Team Leader or designee.
- 2. Team Field Coordinator (direction).
- 3. Team Field Coordinator (Communications).
- 4. Team Health Physics.

#### Minimum Equipment

1.1.1.

Emergency Response Kit

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Class C emergencies are those incidents in which at least one of the following situations (or similar situations) are present:

- There appears to be a major release of radioactivity in the form of contamination or higher than expected radiation dose levels. For definition purposes major releases originating from non-DAM-LSA, Type A and Type B shipments.
- There appears to be significant damage to licensed package (i.e., casks).
- It appears that the clean-up can only be accomplished with major equipment (heavy construction equipment, respirators, etc.).
- It appears that one or more individuals have been exposed or have ingested radioactivity at levels higher than accepted ty Corporate policy or federal regulations (Reference 2.3).

#### Minimum Personnel At Location - Seven

- 1. Team Leader or designee.
- 2. Team Field Coordinator (direction).
- 3. Team Field Coordinator (Communications).
- 4. Team Health Physics.
- 5. Team Health Physics.
- 6. Team Health Physics.
- 7. Team Operator Personnel.

#### Minimum Equipment

Emergency Response Kit

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APPENDIX B REPORT OF NOTIFICATION (3 PAGES)

DOCUMENT		REV.	SHEET	
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# REPORT OF NOTIFICATION

	TIME	
	POSITION	
	N PHONE NUMBERCONT	
DIRECTIONS TO SCENE OF OCCURR	ENCE (IF NECESSARY)	
	NO.	
HOW MANY? TRANSPORT	TO HOSPITAL? YES NO	
	TEAMS PRESENT? YESNO	
	DR MUNICIPAL LAW ENFORCEMENT	1 The second
	SQUAD AMBULANCE	
WRECKER SERVICE RADIO		
	OTHER SPECIFY	
TYPE OF OCCURRENCE		
	OCCUPATIONAL HEALTH	
	MICALS VIOLATION OF	
	DURE OTHER SPECI	
RADIOLOGICAL RELATED: VEHICUL	AR ACCIDENT PACKAGE DAMAG	E
FIXED F	ACILITY RELEASE	
NUCLEAR	POWER PLANT ACCIDENT	

CN-EM-001, APPENDIX B PAGE 1, REV. 10/30/86 REPORT OF NOTIFICATION

CN-EM-001, APPENDIX B PAGE 2, REV. 10/30/86

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	•	OCCUPATIONAL HEALTH: DESCRIPTION OF PROBLEM?						
	•							
		VIOLATION OF SAFETY RELATED PROCEDURE? (PROVIDE NUMBER)						
	•	OTHER DESCRIPTION:						
в.	RAD	IOLOGICAL RELATED						
	0	TYPE AND QUANTITY OF RADIOACTIVITY INVOLVED						
		RADIONUCLIDES(S) ACTIVITY MCI CI						
	0	PACKAGE TYPE? NUMBER OF PACKAGES:						
		CASKMETAL BOXESNOODEN BOXESCARDBOARD BOX						
		SHIELDED CONTAINERGLASS CONTAINERDRUMS						
		BULKOTHERSPECIFY:						
	۰	HAS THE ACCIDENT BEEN VISUALLY INSPECTED: YES NO						
		NO PACKAGE DAMAGEPOTENTIAL PACKAGE DAMAGEPACKAGE DAMAGE						
	٥							
		NO CONTAMINATION POTENTIAL CONTAMINATION CONTAMINATED						
		NORMAL RADIATION DOSES ABNORMAL RADIATION DOSES						
		RADIATION LEVELS:						
		CONTAMINATION LEVELS:dpm/100 cm <sup>2</sup>						
		AIRBORNE LEVELS:						

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# REPORT OF NOTIFICATION

IS THERE A FIRE ASSO			
IN CONTACT WITH RAD			
WEATHER CONDITIONS?			
OTHER ITEMS TO HELP	DEFINE OCCURRENC	Æ:	
	IS:		

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	APPENDIX C			
ANAGEMENT	NOTIFICATION	NUMBERS		
	(4 PAGES)			

# MANAGEMENT NOTIFICATION NUMBERS

### TRANSPORTATION-RADIOACTIVE MATERIAL

NAME		OFFICE	HOME	PAGER
G. A. Rae	(MANDATORY)	803-256-0450	803/359-9915	
L. D. Toner	(MANDATORY)	803/259-1781	803/648-4129	803/649-8255
D. W. Hanshew	(ALTERNATE)	803/259-1781 Mobile Phone	803/259-7267 803/266-7145	803/266-4025
J. S. Zewack1	(ALTERNATE)	803/259-1781	803/259-7294	803/266-4007
M. T. Ryan	(ALTERNATE)	803/259-1781	803/648-7440	803/649-8244
Regulatory Affairs	(MANDATORY)	803/256-0450	(See on call list)	803/733-7651
D. G. Ebenhack	(ALTERNATE)	803/256-0450	803/787-6942	

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### MANAGEMENT NOTIFICATION NUMBERS

### BARNWELL SITE OPERATIONS

		OFFICE	HOME	PAGER
J. S. Zawacki	(MANDATORY)	803/259-1781	803/259-7294	803/266-4007
M. T. Ryan	(MANDATORY)	803/259-1781	803/648-7440	803/649-8244
M. J. Benjamin	(ALTERNATE)	803/259-1781	803/266-4438	
G. Hurst	(ALTERNATE)	803/259-1781	803/259-2788	
E. Boyles	(ALTERNATE)	803/259-1781	803/259-1904	
F. Flynn	(ALTERNATE)	803/259-1781	803-266-3095	
		Mobile Phone	803/266-7133	
Regulatory Affairs or	(MANDATORY)	803/256-0450	(See on call list)	803/733-7651
D. G. Ebenhack	(ALTERNATE)	803/256-0450	803/787-6942	

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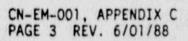
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#### MANAGEMENT NOTIFICATION NUMBERS

## UTILITY SERVICES

NAME		OFFICE	HOME	PAGER
G. A. Rae J. D. Jeffrey	(MANDATORY) (MANDATORY)	803/256-0450 803/256-0450	803/359-9915 803/796-0388 or	803/733-7650
C. B. Poston D. L. Mangum	(ALTERNATE) (ALTERNATE)	803/256-0450 803/256-0450	803/553-3323 803/359-1588 803/788-2564	
L. G. Peay Regulatory Affairs	(ALTERNATE) (MANDATORY)	803/256-0450 803/256-0450	803/359-9526 (See on call list	803/733-7651
D. G. Ebenhack	(ALTERNATE)	803/256-0450	(803-787-6942	



#### MANAGEMENT NOTIFICATION NUMBERS

#### OPERATIONS-GOVERNMENT PROGRAMS & ENVIRONMENTAL SERVICES

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NAME		OFFICE	HOME	PAGER
R. G. Hamilton J. P. Steahr T. C. Weeks	(MANDATORY) (MANDATORY) (ALTERNATE	803/256-0450 803/256-0450 803/256-0450	803/736-1767 803/359-2702 803/772-3519	
Regulatory Affairs	(MANDATORY)	803/256-0450	(See on call	11st) 803/733-7651
D. G. Ebenhack	(ALTERNATE)	803/256-0450	803-787-6942	

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#### MANAGEMENT NOTIFICATION NUMBERS

#### OPERATIONS-GOVERNMENT PROGRAMS & ENVIRONMENTAL SERVICES

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NAME		OFFICE	HOME	PAGER
R. G. Hamilton J. P. Steahr T. C. Weeks	(MANDATORY) (MANDATORY) (ALTERNATE	803/256-0450 803/256-0450 803/256-0450	803/736-1767 803/359-2702 803/772-3519	
Regulatory Affairs	(MANDATORY)	803/256-0450	(See on call	11st) 803/733-7651
D. G. Ebenhack	(ALTERNATE)	803/256-0450	803-787-6942	

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# APPENDIX D EMERGENCY RESPONSE TEAM MEMBERS

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#### EMERGENCY RESPONSE TEAM MEMBERS

#### This list is in alphabetical order - not in order of contact

## EMERGENCY RESPONSE TEAM LEADERS (ETL'S)

NAME	BUSINESS	HOME	PAGER
David Hanshew (Transportation)	803/259-7120	803/259-7267	803/266-4025
Jim Jeffrey (Utility Services)	Mobile Phone 803/256-0450	803/266-7145 803/796-0388 or	803/733-7650
Larry Sears (Government Programs)	803/256-0450	803/553-3323 803/781-5633	803/733-7653
Jimmy Still (Barnwell Site)	803/259-1781	803/259-1675	803/266-4045
Len Toner (Transportation)	803/259-1781	803/648-4129	803/649-8255
John Zawacki (Barnwell Site)	803/259-1781	803/259-7294	803/266-4007
TEAM FIELD COORDINATOR (ETC)			
Mike Benjamin	803/259-1781	803/266-4438	803/266-4002
Fred Gardner	803/256-0450	803/781-6626	
Bill House	803/256-0450	803/345-1731	
George Hurst	803/259-1781	803/259-2788	
Mark Kirshe (Northeast)	203/677-0457	203/379-0233	
Dave Mangum	803/256-0450	803/788-2564	
Les Poppe (Midwest) Mark Whittaker	815/467-3000 803/256-0450	815/744-5133 803/781-2036	
EMERGENCY RESPONSE TEAM HEALTH PH		6037761-2036	
Patty Beck	803/259-1781	803/259-7794	
John Bender	803/256-0450	803/781-8131	
Wayne Gaul Rene' Johnson	803/256-0450 803/259-1781	803/758-2070 803/259-2090	
Kene' Johnson	R04/259-1/81	NO1112EG_2000	
Roger Johnson	803/256-0450	803/781-0818	
Roger Johnson Mark Lewis	803/256-0450 803/256-0450	803/781-0818 803/794-7726	
Roger Johnson Mark Lewis Bill Love	803/256-0450 803/256-0450 203/677-0457	803/781-0818 803/794-7726 203/376-0814/0812	
Roger Johnson Mark Lewis Bill Love Mark Manning	803/256-0450 803/256-0450 203/677-0457 803/256-0450	803/781-0818 803/794-7726 203/376-0814/0812 803/791-7483	
Roger Johnson Mark Lewis Bill Love	803/256-0450 803/256-0450 203/677-0457	803/781-0818 803/794-7726 203/376-0814/0812	
Roger Johnson Mark Lewis Bill Love Mark Manning Dennis Niegowski	803/256-0450 803/256-0450 203/677-0457 803/256-0450 803/259-1781 815/467-3000	803/781-0818 803/794-7726 203/376-0814/0812 803/791-7483 803/259-7763	
Roger Johnson Mark Lewis Bill Love Mark Manning Dennis Niegowski Ron Versailles (Midwest) EMERGENCY RESPONSE TEAM OPERATORS	803/256-0450 803/256-0450 203/677-0457 803/256-0450 803/259-1781 815/467-3000 (ETQ)	803/781-0818 803/794-7726 203/376-0814/0812 803/791-7483 803/259-7763 815/942-2190	
Roger Johnson Mark Lewis Bill Love Mark Manning Dennis Niegowski Ron Versailles (Midwest) EMERGENCY RESPONSE TEAM OPERATORS Charles Grubbs	803/256-0450 803/256-0450 203/677-0457 803/256-0450 803/259-1781 815/467-3000 (ETO) 803/259-1781	803/781-0818 803/794-7726 203/376-0814/0812 803/791-7483 803/259-7763 815/942-2190 803/259-5171	
Roger Johnson Mark Lewis Bill Love Mark Manning Dennis Niegowski Ron Versailles (Midwest) EMERGENCY RESPONSE TEAM OPERATORS	803/256-0450 803/256-0450 203/677-0457 803/256-0450 803/259-1781 815/467-3000 (ETQ)	803/781-0818 803/794-7726 203/376-0814/0812 803/791-7483 803/259-7763 815/942-2190	803/648-0507

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APPENDIX E EMERGENCY RESPONSE CHECKLIST (1 PAGE)

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## EMERGENCY RESPONSE CHECKLIST

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## BEFORE REACHING SCENE

	Contact ETL/ETC for update
	Procure Spare Batteries for Instruments
ALC: NO. OF STREET, ST	PIC-6 2 "9V" NEDA 1604
	E-120, E-520 2 "D" cells
	PAC-4G 5 "D" cells
	Procure Additional Equipment (as necessary)

# ARRIVAL

202

 Contact ETL/ETC
 Contact Local/On Scene Authories
 Evaluate Situation (Initial)
 Plan Initial Entry/Action'
 Assign Initial Tasks to Team Members

# EVALUATION

	Obtain paperwork
****	Radiation/Contamination/Airborne Levels
-	Package(s) Condition (Visual)
	Plan Control Actions
-	Contact ETL/ETC
	Discuss Plan with On Scene Authorities
	Assign Tasks to Team

# SECURE AREA

 Set Up Control Point
 Rope off Area (double boundary)
 Prevent Additional Release
 Prevent Contamination Spread
Identify any Personnel Contamination

# DEMOBILIZE

	Contact ETL/ETC	
	Discuss Situation with On Scene Authorities	
	Decon Personnel	
	Secure Contaminated Equipment/Supplies	
-	Independent Written Report by each Team Memi	ber
	Summary Report by ETL	

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APPENDIX F PROTECTIVE ACTION GUIDE (2 PAGES)

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# PROTECTIVE ACTION GUIDE

	CONDITION		CONSIDERATIONS		PROTECTIVE ACTION
A.	Any Accident	1.	Harm to people or the environment	1.	Follow CN-EM-001 "CNSI Emergency Response Procedure" and CN-AD-005 "Incident Reporting Procedure for Notifications, Actions, and Reporting"
B.	No apparent damage or minor damage	۱.	Adhere to regula- tions pertaining to maximum permissible limits of radiation and contamination.	1.	Conduct a complete radiation survey of of the accident scene.
		2.		2. n.	Inspect all surfaces for contamination, excessive radiation levels, and package damage.
c.	Loss or leakage of radioactivity		<ol> <li>Area should be con- sidered contaminated. Leakage should be contained and/or collected</li> </ol>	1.	Protective clothing must be worn in area.
				2.	Post area; control access.
				3.	Monitor all persons who may be potentially contaminated.
				4.	Begin Air Sampling if equipment is available.
D.	Damage to 1 the package		<ol> <li>Possible high radiation levels.</li> </ol>	1.	Evacuate areas with radiation levels of 100 mR/hr or higher.
				2.	Do not attempt to enter high radiation areas without monitoring equipment.
				3.	Request additional assistance from ETL.
				4.	Begin air sampling if equipmen is available.
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#### PROTECTIVE ACTION GUIDE

#### PROTECTIVE ACTION CONDITION CONSIDERATIONS 1. Monitor radiation Fire 1. Determine what hazard E. levels (high radiation may indicate damage to shielding). are involved before entering area. 2. Determine if 2. Approach from upwind radioactivity is involved in fire side of vehicle 3. Use self-contained Establish control area at 100 yd. radius in event fire breathing apparatus for entering smoke area results in shielding 4. Protective clothing damage. may be required. Begin Air sampling if equipment is available.

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APPENDIX G EQUIPMENT LIST FOR EMERGENCY RESPONSE KIT (2 PAGES)

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## EQUIPMENT LIST FOR EMERGENCY RESPONSE KIT

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*Indicates equipment in satellite kits.
*One dosimeter charger
*One dose rate survey instrument - Model PIC-6 or equivalent
One GM Survey Instrument - Model E-520 or equivalent
*One GM Survey Instrument - Model E-120 or equivalent with pancake probe
*One alpha counter instrument - Model Pac-4G-3 or equivalent.
*One personnel decontamination kit (mild liquid soap or waterless hand cleaner, Q-Tip swabs, paper towels)
*Four 55-gallon plastic bags
"One portable air sampler (12-volt model)
"One box each air sampler filter papers and iodine cartridges
*Two full-face respirators with iodine canisters
*Twelve pairs of rubber surgical gloves or anti-c gloves
*Two O-5R self-reading dosimeters
*Two clipboards and note pads
*One dry-erase miniboard
*Two dry-erase markers
Two 1-liter plastic sample bottles
*Six O-200 mR self-reading dosimeters
"One 3' X 6' plastic step-off pad (herculite)
"Six each "High Radiation Area" and "Radiation Area" signs
*Ten plastic bags (minimum 2' x 2')
Twenty-five i-gallon size soil sample bags
*Twelve pairs each plastic-dipped gloves and rubber shoe covers
*Six each coveralls, hoods, and rolls of masking tape
*600 to 1000 feet of radiation warning rope

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#### EQUIPMENT LIST FOR EMERGENCY RESPONSE KIT CONTINUED

"One box of 2-inch diameter smear pads

"Small plastic bags for smear pads

Four pairs of safety glasses

\*First Ald Kit

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One kit of hand tools to include: bolt cutters, axe, two shovels, crowbar, sledge hammer, large screwdriver, 3/8-inch socket set, and adjustable 12"-18" crescent wrench

"Two lanterns or flashlights and spare batteries

\*Two copies of this procedure -- CN-EM-001

"Six each pens, pencils, chalk, and felt-tip markers

DOT Emergency Response Handbook -- DOT-P-5800.3

Code of Federal Regulations, Title 49, Parts 100-199

\*Lantern mantles to use as check sources

"Roll of quarters

CN-EM-001, APPENDIX G PAGE 2 REV. 12/10/87 APPENDIX H EMERGENCY RESPONSE KIT INSPECTION (1 PAGE)

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# EMERGENCY RESPONSE KIT INSPECTION

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MONT	THLY			
1)	Location		2) Date	
3)	Survey Meters:			
	Туре			
	Serial Number			
	Calibration Due Date			-
	Type			
	Serial Number			
	Calibration Due Date			-
	Туре			
	Serial Number			
	Calibration Due Date			
	Туре			
	Serial Number			
	Calibration Due Date			
4)	Seal Broken Since Last Insp (If yes, completely invento	ection: ry.)	Yes	No
SEM	I-ANNUALLY:			
Com CN-	emplete inventory required Janu -EM-001, Section 4.1.)	ary and June	of each year.	(Use item list per
Ins	spection Performed By:			
	Signature	-		Date

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