



Nebraska Public Power District

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U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: 1994 Cooper Nuclear Station Emergency Preparedness Exercise Objectives

The Nebraska Public Power District hereby submits the Section 2 Scope and Objectives for the 1994 Emergency Preparedness Exercise scheduled for November 15, 1994. In order to support the scenario development schedule, it is requested that any comments concerning the exercise objectives be submitted to my office by September 16, 1994.

Please contact me if you should have any questions or need additional information.

Sincerely,

G. R. Horn
Vice President - Nuclear

/rg

Enclosure

cc: A. McQueen w/enc.
USNRC - Region IV

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Section 2

SCOPE AND OBJECTIVES

2. SCOPE AND OBJECTIVES

2.1 Scope

The 1994 CNS Emergency Preparedness Exercise, to be conducted on November 15, 1994, will test and provide the opportunity to evaluate the emergency plans and procedures of NPPD. It will test the ability of participants to assess and respond to emergency conditions and coordinate activities to protect the health and safety of individuals in the plant and in the vicinity of CNS from the consequences of a radiological incident at CNS. The Exercise has been developed to support demonstration of the capabilities of the NPPD Emergency Response Organization, and will include activation and participation of all NPPD emergency facilities.

The Exercise will be used to evaluate the ability of the onsite response personnel to assess and mitigate the emergency situations at the plant, and to take actions to assist state and local government organizations in mitigating the radiological consequences to persons in the vicinity of the plant. In addition, the Exercise will provide NPPD with the opportunity to assess the effectiveness of training improvements and modifications made to the CNS Emergency Plan and Procedures since the last Exercise.

Emergency response actions during the Exercise will include:

- prompt recognition and accurate classification of emergency conditions;
- assessment of onsite/offsite radiological consequences, and activities to minimize the impact of these consequences;
- notification and mobilization of the emergency response organizations;
- implementation of in-plant corrective actions;
- activation/operation of emergency response facilities and equipment;

- preparation of adequate records to document decisions made and actions taken;
- formulation and recommendation of protective actions for personnel within the area; and
- termination of and recovery from the emergency condition.

Specific objectives to be demonstrated by the NPPD CNS Emergency Response Organization and Facilities are identified in the following section.

2.2 Objectives

Exercise objectives are provided under this heading. Objectives provide a basis for scenario development and a means to evaluate responses by the emergency response organization.

The Nebraska Public Power District radiological emergency preparedness exercise objectives for the Cooper Nuclear Station are based on Nuclear Regulatory Commission (NRC) requirements provided in 10 CFR 50.47, "Emergency Plans", and 10 CFR 50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities". Additional guidance provided in NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants", was utilized in developing the objectives.

Objectives are grouped according to functional area of emergency response. Additionally, objectives have been cross referenced to major or parent Emergency Plan Implementing Procedures used in demonstrating the objective, and to any related open weakness from the previous years' exercises.

General Objectives:

Accident Assessment, Classification and Mitigation

1. Demonstrate the ability to assess plant conditions and classify emergency events per EPIP 5.7.1..

¹NUREG-0654 ref: D.1-2; H.5; I.1

²Major EPIP ref: 5.7.1

³Weakness ref: none

2. Demonstrate the ability to identify projected trends and potential consequences.

¹NUREG-0654 ref: D.1-2; H.5; I.1

²Major EPIP ref: 5.7.7, 5.7.9, 5.7.16

³Weakness ref: none

Notification and Mobilization

3. Demonstrate the ability to alert and notify NPPD emergency response personnel.

¹NUREG-0654 ref: A.1.e; B.1,5; E.2; F.1.e

²Major EPIP ref: 5.7.6

³Weakness ref: none

4. Demonstrate the ability to mobilize NPPD emergency response personnel and activate emergency response facilities within the time frames specified in the Emergency Plan.

¹NUREG-0654 ref: J.1

²Major EPIP ref: 5.7.7, 5.7.8, 5.7.9

³Weakness ref: none

5. Demonstrate the ability of NPPD to notify federal, state and county agencies within the time frames specified in the Emergency Plan.

¹NUREG-0654 ref: A.1.e; B.4,7.c; E.1-4; F.1; J.7; N.2.a

²Major EPIP ref: 5.7.6

³Weakness ref: none

6. Demonstrate the ability to alert, advise and direct onsite non-essential personnel.

¹NUREG-0654 ref: J.1

²Major EPIP ref: 5.7.3, 5.7.4, 5.7.10, 5.7.11

³Weakness ref: none

Emergency Response

7. Demonstrate the ability to direct and coordinate emergency responses.

¹NUREG-0654 ref: A.1.d; B.2-6

²Major EPIP ref: 5.7.7, 5.7.8, 5.7.9

³Weakness ref: none

8. Demonstrate the ability to transfer emergency direction from the Control Room (CR), to the TSC, and finally to the EOF, or from the Control Room directly to the EOF.

¹NUREG-0654 ref: A.1.d; B.3-5

²Major EPIP ref: 5.7.7, 5.7.9

³Weakness ref: none

9. Demonstrate the ability to provide initial and continuous accountability of onsite individuals.

¹NUREG-0654 ref: J.5

²Major EPIP ref: 5.7.10

³Weakness ref: none

10. Demonstrate site recovery/re-entry planning.

¹NUREG-0654 ref: M.1-3, B.7.a-b

²Major EPIP ref: 5.7.25

³Weakness ref: none

Radiological Assessment and Control

11. Demonstrate the ability to provide radiological monitoring and decontamination capabilities for onsite personnel.

¹NUREG-0654 ref: K.7

²Major EPIP ref: 5.7.13

³Weakness ref: none

12. Demonstrate the ability to establish onsite contamination controls, and area access controls.

¹NUREG-0654 ref: K.5,6

²Major EPIP ref: 5.7.12, 5.7.13

³Weakness ref: none

13. Demonstrate the ability to continuously monitor and control emergency worker exposures.

¹NUREG-0654 ref: K.1.a-g,2,3.a-b

²Major EPIP ref: 5.7.12, 5.7.13

³Weakness ref: 298/9324-01

14. Demonstrate the ability to monitor, assess, and correlate onsite radiological conditions with plant conditions.

¹NUREG-0654 ref: H.5.b,c,9; I.1-3; N.2.d,e.1

²Major EPIP ref: 5.7.19

³Weakness ref: none

15. Demonstrate the ability to collect and analyze simulated radiological samples and surveys to determine location and characterization of radiological plume.

¹NUREG-0654 ref: H.5.b,7; N.2.d,e.1

²Major EPIP ref: 5.7.18, 5.7.19

³Weakness ref: none

16. Demonstrate the ability to determine source terms and dose projections, evaluate dose projections against protective action guides and determine appropriate onsite and offsite protective actions.

¹NUREG-0654 ref: H.6a,8; I.3-7,9-10; J.10.m

²Major EPIP ref: 5.7.16, 5.7.17, 5.7.20

³Weakness ref: none

17. Demonstrate the ability to formulate protective action recommendations for offsite agencies, and to communicate these recommendations promptly.

¹NUREG-0654 ref: I.5-10, J.7

²Major EPIP ref: 5.7.20

³Weakness ref: none

Emergency Response Facility-Specific Objectives:

18. Emergency Operations Facility (EOF):

- a. Demonstrate the capability of the EOF emergency response organization to implement the Emergency Plan and Procedures.
- b. Demonstrate reliable communications between the EOF and CR, TSC, government emergency facilities, and field teams.
- c. Demonstrate availability of appropriate emergency equipment and supplies.
- d. Demonstrate security access control.
- e. Demonstrate activation and staffing of the EOF in the timeframe specified in the Emergency Plan.
- f. Demonstrate the functional adequacy of the EOF facilities.

¹NUREG-0654 ref: B.5; H.2-3,6-8; J.6.a-c,10.a-b, E.2;
F.1,2,3

²Major EPIP ref: 5.7.9, 5.7.21, 5.7.22

³Weakness ref: none

19. Technical Support Center (TSC):

- a. Demonstrate the capability of the TSC emergency response organization to implement the Emergency Plan and Procedures.
- b. Demonstrate the ability to provide technical support for operations in accident assessment and mitigation.
- c. Demonstrate reliable communications between the TSC and the OSC, EOF, inplant response teams, and the Control Room.

- d. Demonstrate the availability of emergency equipment and supplies.
- e. Demonstrate activation and staffing of the TSC in the timeframe specified in the Emergency Plan.
- f. Demonstrate the functional adequacy of the TSC facilities.
- g. Demonstrate the ability to perform core damage assessment.

¹NUREG-0654 ref: B.5; B.7.a-b,; H.1,6-8,; I.3; J.6.a-c, E.2; F.1,2,3

²Major EPIP ref: 5.7.7, 5.7.17, 5.7.21, 5.7.22

³Weakness ref: none

20. Control Room (CR)

- a. Demonstrate the capability of the Control Room emergency response organization to implement the Emergency Plan and Procedures.
- b. Demonstrate the adequacy of information flow between the Control Room, TSC, EOF and inplant operators.
- c. Demonstrate the availability of emergency equipment and supplies.
- d. Demonstrate the functional adequacy of the Control Room facilities.

¹NUREG-0654 ref: B.5; E.2; F.1,2,3; H.6-9,12; J.6.a-c

²Major EPIP ref: 5.7.2, 5.7.3, 5.7.21, 5.7.22

³Weakness ref: none

21. Operations Support Center (OSC):

- a. Demonstrate the capability of the OSC emergency response organization to implement the Emergency Plan and Procedures.

- b. Demonstrate reliable communications between the OSC, TSC, and inplant teams.
- c. Demonstrate the availability of emergency equipment and supplies.
- d. Demonstrate activation and staffing of the OSC in the timeframe specified in the Emergency Plan.
- e. Demonstrate the functional adequacy of the OSC facilities.
- f. Demonstrate the ability to dispatch OSC repair and/or rescue team personnel.

¹NUREG-0654 ref: B.5; E.2; F.1,2,3; H.1; J.6.a-c

²Major EPIP ref: 5.7.8, 5.7.13, 5.7.21, 5.7.22

³Weakness ref: 298/9324-01

Scenario

- 22. Develop an exercise scenario and controller organization which supports demonstration and evaluation of a major portion of the emergency plan.

¹NUREG-0654 ref: N.1.a-b

²Major EPIP ref: EPDP 11

³Weakness ref: none

Evaluation

- 23. Demonstrate the ability to conduct a post-exercise critique to identify weak or deficient areas needing correction.

¹NUREG-0654 ref: N.4,5

²Major EPIP ref: EPDP 11

³Weakness ref: none

FOOTNOTES

¹ References related emergency planning objectives provided as guidance in NUREG-0654/FEMA-REP-1 Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" as based on NRC requirements provided in 10 CFR 50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities".

² References major NPPD-CNS Emergency Plan Implementing Procedure(s) used in demonstrating the objective. Other procedures may be applicable but will generally be referenced by, or branched from, the major procedure.

³ References applicable open weakness from the 1993 Exercise as listed in NRC docket 50-298/93-24 (see the following for a summary of the weakness).

1993 NRC Exercise WeaknessSummary

298/9324-01 Training Program Description 0415, "Respiratory Protection" describes the licensee's requirements for the qualification of personnel who could be required to wear respiratory protection. This TPD requires that OSC maintenance and operator personnel be respirator qualified. The failure to ensure that a response team member was qualified as specified was identified as an exercise weakness.

In addition, an operator was dispatched into the plant even though records available in the OSC showed the individual's respiratory qualifications had expired because the individual's physical had lapsed. The individual was deemed qualified because he stated that he had completed the physical but the records had not been updated.