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AFFECTED DOCUMENT IPEC EMERGENCY PLANNING PROCEDURES

DOC #	REV #	TITLE	INSTRUCTIONS
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THE FOLLOWING PROCEDURE(S) HAS BEEN REVISED, PLEASE REMOVE YOUR CURRENT COPY AND REPLACE WITH ATTACHED UPDATED REVISION:

IP-1055 REVISION 19

IP-EP-120 REVISION 14

IP-EP-210 REVISION 27

IP-EP-241 REVISION 6

And All GENERAL RECORDS

EFFECTIVE DATE: 6/1/2020

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10CFR50.54(Q)(2) Review

Procedure/Document Number: IP-1055	Revision: 19
Equipment/Facility/Other: Indian Point Energy Center	
Title: Fire Emergency Response	

Part I. Description of Activity Being Reviewed (event or action, or series of actions that have the potential to affect the emergency plan or have the potential to affect the implementation of the emergency plan):

Procedure was revised, to reflect the requirement in the Post Unit 2 Shutdown Eplan (PSEP), as submitted to the NRC per LAR, license #NL-19-001. See attached matrix for changes made. Procedure will be effective on June 1, 2020,

Part II. Emergency Plan Sections Reviewed (List all emergency plan sections that were reviewed for this activity by number and title. IF THE ACTIVITY IN ITS ENTIRETY IS AN EMERGENCY PLAN CHANGE, EAL CHANGE OR EAL BASIS CHANGE, ENTER THE SCREENING PROCESS. NO 10CFR50.54(q)(2) DOCUMENTATION IS REQUIRED.

Part 1 Introduction:

Section A: Purpose

Part 2 Planning Standards and Criteria:

Section A: Assignment of Responsibility

Section H: Emergency Facilities and Equipment

Part III. Ability to Maintain the Emergency Plan (Answer the following questions related to impact on the ability to maintain the emergency plan):

- Do any elements of the activity change information contained in the emergency plan (Section 3.0 Step 6)?
YES NO IF YES, enter screening process for that element
- Do any elements of the activity change an emergency classification Initiating Condition, Emergency Action Level (EAL), associated EAL note or associated EAL basis information or their underlying calculations or assumptions?
YES NO IF YES, enter screening process for that element
- Do any elements of the activity change the process or capability for alerting and notifying the public as described in the FEMA-approved Alert and Notification System design report?
YES NO IF YES, enter screening process for that element
- Do any elements of the activity change the Evacuation Time Estimate results or documentation?
YES NO IF YES, enter screening process for that element
- Do any elements of the activity change the Onshift Staffing Analysis results or documentation?
YES NO IF YES, enter screening process for that element

10CFR50.54(Q)(2) Review

Procedure/Document Number: IP-1055	Revision: 19
Equipment/Facility/Other: Indian Point Energy Center	
Title: Fire Emergency Response	

Part IV. Maintaining the Emergency Plan Conclusion The questions in Part III do not represent the sum total of all conditions that may cause a change to or impact the ability to maintain the emergency plan. Originator and reviewer signatures in Part V document that a review of all elements of the proposed change have been considered for their impact on the ability to maintain the emergency plan and their potential to change the emergency plan.

1. Provide a brief conclusion that describes how the conditions as described in the emergency plan are maintained with this activity.
2. Check the box below when the 10CFR50.54(q)(2) review completes all actions for all elements of the activity – no 10CFR50.54(q)(3) screening or evaluation is required for any element. Otherwise, leave the checkbox blank.
 I have completed a review of this activity in accordance with 10CFR50.54(q)(2) and determined that the effectiveness of the emergency plan is maintained. This activity does not make any changes to the emergency plan. No further actions are required to screen or evaluate this activity under 10CFR50.54(q)(3).

Per Post Shutdown Emergency Plan (PSEP), the fire brigade leader can come from either Unit. The changes made to this procedure (see attached matrix) reflects this requirement of the PSEP as submitted to the NRC (license # NL-19-001) and some minor editorial adjustments. The NRC has approved the PSEP per RA-20-040.

A review of this activity in accordance with 10 CFR 50.54(q)(2) has been completed and determined that the effectiveness of the PSEP is maintained. This revision aligns the procedure with the protocols of the post Unit 2 shutdown. None of the changes affect the ability to perform classifications, notifications, or PARs, it does not affect activation or staffing of the ERO, and all planning standard requirements are maintained. The changes made do not require a change to the Emergency Action Level scheme, On-shift Staffing study or the PSEP.

No further actions are required to screen or evaluate this activity under 10 CFR 50.54(q)(3).

Part V. Signatures:

Preparer Name (Print) Rebecca A. Martin	Preparer Signature <i>Rebecca A Martin</i>	Date: 5/14/2020
(Optional) Reviewer Name (Print)	Reviewer Signature	Date:
Reviewer Name (Print) Timothy Garvey Nuclear EP Project Manager	Reviewer Signature <i>Rebecca A Martin for T Garvey</i> Approval Per telecom	Date: 5/14/2020
Approver Name (Print) Frank Mitchell Emergency Planning Manager or designee	Approver Signature <i>Frank Mitchell</i>	Date: 5/15/2020

IP-1055 Revision 19 REVISION MATRIX

Change No.	Page/Section	Previous Version	New Version	Editorial Change	Effect on 10 CFR 50.47(b) Planning Standards or NUREG-0654 program elements? Justify if NO.
1.	Page 4 Section 4.2	2-ONOP-FP-001, "Plant Fire"	2-ONOP-FP-001, "Plant Fires"	Y	N – added "s" to end of Fire to fix typo in the title of the procedure.
2.	Page 4 Section 4.3	IP-EP-AD-13	IP-EP-AD13	Y	N – removed the "-" between AD & 13 to fix typo in procedure number.
3.	Page 4 Section 4.6	4.6 In accordance with "Site Fire Protection" and "Fire Emergency" the Site Fire Brigade is responsible for responding to any fire emergency at IPEC and for requesting offsite firefighting assistance, if needed. Requests for offsite assistance are made via the Unit 2 Control Room.	4.6 In accordance with "Site Fire Protection" and "Fire Emergency" the Site Fire Brigade is responsible for responding to any fire emergency at IPEC and for requesting offsite firefighting assistance, if needed.	N	N – Removed, "Requests for offsite assistance are made via the Unit 2 Control Room." Per Decommissioning Emergency Plan, the fire brigade can come from either Unit and can make calls for assistance. Removed the requirement for only Unit 2 to make the calls. This change reflects that requirement in the Post Unit 2 shut down Eplan, which is under an LAR. (license # NL-19-001) Approved by NRC.
4.	Page 4 Section 5.1	5.1 When requested by the Fire Brigade Leader and as directed by the SM the Off-Site Fire Department will be called, from the Unit 2 Control Room for assistance.	5.1 When requested by the Fire Brigade Leader and as directed by the SM the Off-Site Fire Department will be called for assistance.	N	N – Removed, "from the Unit 2 Control Room." Per Decommissioning Emergency Plan, the fire brigade leader can come from either Unit and can make calls for assistance. Removed the requirement for only Unit 2 to make the calls. This change reflects that requirement in the Post Unit 2 shut down Eplan, which is under an LAR. (license # NL-19-001) Approved by NRC.
5.	Page 6, section 6.1 & Page 8 section 17	EP-6-ALL, "Team Tracking Log"	EP-5-ALL, "Team Dispatching Form"	Y	N – Fleet form updated. Previous Q completed to accept the new form.
6.	Page 6, section 9.0	Watch Radiation Protection Technician Fire Response	Watch Radiation Protection Fire Response	Y	N – Updated typo in Attachment title.
7.	Page 8 Attachment 9.1	Watch HP Fire Response	Watch Radiation Protection Fire Response	Y	N – Updated typo in Attachment title.
8.	Page 9, Section 4	ENSURE access for Fire Brigade at 4th floor HP Control Point (Unit 3)	ENSURE access for Fire Brigade at HP Control Point.	N	N – Fire Brigade can respond to a fire at either Unit and will need access to both Unit 2 and Unit 3 control points. The intent is not affected by this change.

IPEC IMPLEMENTING PROCEDURE PREPARATION, REVIEW, AND APPROVAL

IP-SMM-AD-102 Rev:17

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ATTACHMENT 10.2

IPEC PROCEDURE REVIEW AND APPROVAL

(Page 1 of 1)

Procedure Title: Fire Emergency Response

Procedure No: IP-1055 Existing Rev: 18 New Rev: 19 DRN/EC No: DRN-20-00314

Procedure Activity (MARK Applicable)	Converted To IPEC, Replaces:	Temporary Procedure Change (MARK Applicable)
<input type="checkbox"/> NEW PROCEDURE <input type="checkbox"/> GENERAL REVISION <input checked="" type="checkbox"/> PARTIAL REVISION <input type="checkbox"/> EDITORIAL REVISION <input type="checkbox"/> VOID PROCEDURE <input type="checkbox"/> SUPERSEDED	<input type="checkbox"/> Converted To IPEC, Replaces: Unit 1 Procedure No: _____ Unit 2 Procedure No: _____ Unit 3 Procedure No: _____	<input type="checkbox"/> EDITORIAL Temporary Procedure Change <input type="checkbox"/> ADVANCE Temporary Procedure Change <input type="checkbox"/> CONDITIONAL Temporary Procedure Change Terminating Condition: _____
<input type="checkbox"/> RAPID REVISION	Document in Microsoft Word: <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> VOID DRN/TPC No(s): _____

Revision Summary N/A - See Revision Summary Matrix

Implementation Requirements


Implementation Plan? Yes No Formal Training? Yes No Special Handling? Yes No

RPO Dept: Emergency Planning Writer (Print Name/ Ext/ Sign): Rebecca A. Martin/x7106/ Rebecca A. Martin

Review and Approval (Per Attachment 10.1, IPEC Review And Approval Requirements)

1. Technical Reviewer: Kevin Robinson / [Signature] 5-14-2020
(Print Name/ Signature/ Date)
2. Cross-Disciplinary Reviewers:
 Dept: _____ Reviewer: _____
(Print Name/ Signature/ Date)
 Dept: _____ Reviewer: _____
(Print Name/ Signature/ Date)
3. RPO- Responsibilities/Checklist: F. Mitchell [Signature] 5/15/2020
(Print Name/ Signature/ Date)
 - PAD required and is complete (PAD Approver and Reviewer qualifications have been verified)
 - Previous exclusion from further LI-100 Review is still valid
 - PAD not required due to type of change as defined in 4.6
4. Non-Intent Determination Complete: _____
(Print Name/ Signature/ Date)

NO change of purpose or scope NO reduction in the level of nuclear safety NO voiding or canceling of a procedure, unless requirements are incorporated into another procedure or the need for the procedure was eliminated via an alternate process.	NO change to less restrictive acceptance criteria NO change to steps previously identified as commitment steps NO deviation from the Quality Assurance Program Manual NO change that may result in deviations from Technical Specifications, FSAR, plant design requirements or previously made commitments.
--	---
5. On-Shift Shift Manager/CRS: _____
(Print Name/ Signature/ Date)
6. User Validation: User: _____
7. Special Handling Requirements Understood: _____

 IPEC EMERGENCY PLAN ADMINISTRATIVE PROCEDURES	NON-QUALITY RELATED PROCEDURE		IP-EP-AD2	Revision 12
	REFERENCE USE		Page 1	of 1

Attachment 9.1

Emergency Planning Document Change Checklist Form

(All sections must be completed, N/A or place a check on the line where applicable)

Section 1

Doc/Procedure Type:	Administrative <input type="checkbox"/>	Implementing <input checked="" type="checkbox"/>	EPLAN <input type="checkbox"/>	N/A <input type="checkbox"/>
Doc/Procedure No:	IP-1055			
Doc/Procedure Title:	Fire Emergency Response			
New revision number:	19			
Corrective Action:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	CR#: OL-OLI-2018-00090 CA 18
Effective date:	June 1, 2020			

Section 2

Change Description

1. Ensure the following are completed, or are not applicable and are so marked:

- | | | |
|--|-------------------------------------|---|
| a. 50.54q | <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| b. EN-FAP-OM-023 | <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| c. IP-SMM-AD-102 | <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| d. OSRC | <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| e. NRC Transmittal
(within 30 days) | <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |

2. List any other documents affected by this change: N/A

3. Transmittals are completed: N/A Date: 5/18/2020

4. Ensure the proper revision is active in eB Ref. Lib.: N/A

5. Approved doc/procedure delivered to Doc. Control for distribution: N/A Date: 5/19/2020

6. Position Binders updated: N/A Date: 6/1/2020

7. Copy of EPDCC placed in EP file: N/A Date: _____

8. Supporting documentation is submitted as a general record in eB Ref. Lib.: N/A Date: 5/18/2020

9. Word files are moved from working drafts folder to current revision folder in the EP drive:

N/A Date: 6/1/2020



IPEC
EMERGENCY PLAN
IMPLEMENTING
PROCEDURES

NON-QUALITY RELATED
PROCEDURE

REFERENCE USE

IP-1055

Revision 19

Page

1 of 9

CONTROLLED

Fire Emergency Response

Prepared by:

Rebecca A. Martin
Print Name

Rebecca A Martin
Signature

5/13/2020
Date

Approval:

Frank J. Mitchell
Print Name

FL Mitchell
Signature

5/15/2020
Date

Effective Date: June 1, 2020

This procedure excluded from further LI-100 reviews.



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Fire Emergency Response

1.0 PURPOSE

This procedure describes the actions to be taken by personnel who respond to a fire emergency at Indian Point Energy Center (IPEC). This procedure shall also be followed during normal plant operations and when a fire exists in the Radiological Controlled Area (RCA).

2.0 REFERENCES

- 2.1 IP-EP-AD13 IPEC Emergency Action Level Technical Bases
- 2.2 SEP-FPP-IP-001, "IPEC Fire Protection Program Plan"
- 2.3 2-ONOP-FP-001, "Plant Fires"
- 2.4 3-ONOP-FP-1, "Plant Fires"
- 2.5 10CFR20

3.0 DEFINITIONS

- 3.1 Contamination – Radioactive material where it's not wanted
- 3.2 Control Room Operator – Licensed individual in control room operations
- 3.3 Decon – process to remove contamination from a person or piece of equipment
- 3.4 Dosimeter – Equipment used to measure radiation and provide the wearer with a reading of accumulated exposure.
- 3.5 Emergency Telephone Directory – IPEC telephone directory for emergency numbers and Emergency Response Organization; this is located on the Emergency Planning website.
- 3.6 Radiation Protection Technician – Trained individual in radiation protection and detection
- 3.7 NPO – Nuclear Plant Operator – non-licensed operator in the plant
- 3.8 Shift Manger – Licensed operator in charge of plant operations
- 3.9 DLR – Permanent record of an individual's radiation exposure



4.0 RESPONSIBILITIES

- 4.1 When a fire is discovered, all personnel are responsible for notifying the Control Room (CR). Notification of a fire should be made using emergency phone extensions **5911** for both Unit 2 and Unit 3, and should include the caller's name along with the location and nature of the fire.
- 4.2 In accordance with 2-ONOP-FP-001, "Plant Fires" and 3-ONOP-FP-1, "Plant Fires", the CR is responsible for making the required notifications and sounding the fire alarm.
- 4.3 The CR is responsible for determining activation of the Emergency Plan as per the Emergency Action Levels (EALs) found in IP-EP-AD13, "IPEC Emergency Action Level Technical Bases".
- 4.4 The Shift Manager (SM) or Emergency Director (ED) is authorized to allow fire fighters to exceed 10CFR20 limits. Exposure Authorization Form (EP-4-ALL) shall be used.
- 4.5 "Emergency Use of Potassium Iodine (KI)", the SM or ED determines the need to issue potassium iodine (KI) tablets by discussions with Radiological Coordinator or Radiological Assessment Coordinator.
- 4.6 In accordance with "Site Fire Protection" and "Fire Emergency" the Site Fire Brigade is responsible for responding to any fire emergency at IPEC and for requesting offsite fire fighting assistance, if needed.
- 4.7 In accordance with the appropriate procedures, Security is responsible for directing site personnel and offsite fire assistance, and evacuating unnecessary personnel from the fire area.
- 4.8 In accordance with this procedure, the Watch Radiation Protection Technician/designee is responsible for responding to any fire in the Radiological Controlled Area (RCA).

5.0 DETAILS

- 5.1 When requested by the Fire Brigade Leader and as directed by the SM the Off-Site Fire Department will be called for assistance.
- 5.2 The Control Room will notify Security of the impending arrival of the Verplanck Fire Department.
- 5.3 When required, the EP Manager will ensure activation of the Emergency Plan.
 - A. IF the Emergency Response Facilities (ERFs) are staffed, THEN:



1. Via the Radiological Coordinator in the Technical Support Center (TSC), the Plant Operations Manager (POM) will assess the radiological conditions that exist at the fire scene.
2. Prior to dispatching the Fire Brigade, the POM shall assess the following conditions. (If radiological conditions exist where there is a potential to exceed the 10CFR20 limits, refer to EP-4-ALL, Exposure Authorization Form.

- Area dose rate < 10 R/hr.:

The fire Brigade shall be dispatched from the CR to the fire scene. Notification shall then be made to the OSC to dispatch a Radiation Protection Technician to the fire scene to provide radiological guidance.

- Area dose rate > 10 R/hr.:

The POM shall designate a briefing area (e.g., entry into the RCA). Notify the OSC to dispatch a Radiation Protection Technician to the briefing location where he will provide radiological guidance. Authorize dispatch of Fire Brigade to the briefing location prior to responding to the fire scene.

3. **CONDUCT** a debriefing to ensure that the POM and OSC Manager are cognizant of the Fire Brigade actions.
- 5.4 **ENSURE** Radiation Protection Technicians are performing all necessary duties as listed on Attachment 9.1, "Watch Radiation Protection Fire Response".
- 5.5 **ENSURE** Security Officers are performing all necessary duties as listed on Attachment 9.2, "Security Fire Response".

NOTE

Provided full turnout gear is worn, when fighting a fire in a contaminated area, Anti-C clothing is not required to be worn by the Site Fire Brigade and offsite fire fighters.

FOR UNIT 3: Access through the Turnstile at the 4th floor Control Point may be obtained by using the key located in the glass box attached to the Turnstile.

FOR UNIT 2: Enter without use of the Turnstile



6.0 INTERFACES

- 6.1 EN-EP-900, Emergency Preparedness Forms
 - 6.1.1 EP-4-ALL , "Exposure Authorization Form"
 - 6.1.2 EP-5-ALL , "Team Dispatching Form"
- 6.2 FP-7, Fire Notification Guidelines
- 6.3 IP-EP-AD13, *IPEC Emergency Action Level Technical Bases*

7.0 RECORDS


All forms and logs completed by the Emergency Response Organization during a declared emergency are Quality Records and shall be maintained for the life of the plant plus twenty (20) years.

8.0 REQUIREMENTS AND COMMITMENT CROSS-REFERENCE

- 8.1 This procedure does not degrade any requirements or commitments


9.0 ATTACHMENTS

- 9.1 Watch Radiation Protection Technician Fire Response
- 9.2 Security Fire Response

 IPEC SITE EMERGENCY PLAN IMPLEMENTING PROCEDURE	NON-QUALITY RELATED PROCEDURE	IP-1055 Revision 19
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Attachment 9.1
Watch Radiation Protection Fire Response
Page 1 of 2

1. **RESPOND** to all fires in the RCA and have a Self-Contained Breathing Apparatus (SCBA) available for use if needed.
2. For communications with the CR and the Fire Brigade Leader, **BRING** a radio tuned to Frequency #2.
3. **UPON** arrival to the fire scene, **NOTIFY** the Fire Brigade Leader.
4. **EVALUATE** the location of the fire and address any radiological concerns directly to the Fire Brigade Leader at the fire scene or at a briefing designated by the POM.
5. **MAKE** every effort to keep exposures to fire fighters As Low As Reasonably Achievable (ALARA).
6. When possible, **CHECK** all fire fighters to ensure they have the appropriate Dosimetry. If not already done, issue Dosimetry.
7. **SET UP** an air sampler (particulate and iodine) as close as practical to where the smoke may be venting. If available at the fire scene, use a Continuous Air Monitor (CAM) as per approved Radiation Protection procedures.
8. **IF** it becomes necessary for any fire fighter to exceed 10CFR20 limits, **THEN** notify the SM/ED/POM.
9. **IF** it becomes necessary for the offsite fire fighters to exceed Entergy Nuclear Northeast's radiation exposure limits (500 mRem per year) **THEN** notify the SM/ED/POM.
10. **DURING** the fire fighting operations, **EVALUATE** the potential for the spread of radioactive contamination from the use of water.
11. **EVALUATE** airborne activity through the use of the Counting Room. If the air sample activity is greater than 3E-9 µCi/cc, an isotopic analysis is required.
12. **NOTIFY** the Fire Brigade Leader of any restrictions you are imposing on the fire fighters.

 IPEC SITE EMERGENCY PLAN IMPLEMENTING PROCEDURE	NON-QUALITY RELATED PROCEDURE	IP-1055 Revision 19
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Attachment 9.1
Watch Radiation Protection Fire Response
Page 2 of 2

13. As directed by the SM/ED/POM or-Radiological Assessment Coordinator, **ISSUE** KI.
14. When venting smoke, **ADVISE** the Fire Brigade Leader as to proper control of airborne activity. Depending on the heat involved, secondary fires may arise in the ventilation system/filters. The Radiation Protection Technician and the Fire Brigade Leader should consider shutting down the ventilation system if such a possibility exists.
15. **EVALUATE** the need for decontamination and whole body counting of personnel as described in approved Radiation Protection procedures.
16. **DETERMINE** if internal exposure should be assigned.
17. **AFTER** the fire has been extinguished, **RECORD** the name of each fire fighter and their DLR number on EP-5-ALL, "Team Dispatching Form". In addition, obtain a DLR Badge Request Form from Dosimetry and complete it at this time.
 - **IF** the SM/ED/POM has authorized an extension to receive emergency personnel exposure above 10CFR20 limits, **THEN** complete EP-4-ALL, "Exposure Authorization Form".
 - **RETURN** completed forms to the Dosimetry Office.
18. **BEFORE** allowing the fire fighters to leave the RCA for the last time, **CHECK** them, their clothing and equipment for possible contamination as per approved Radiation Protection procedures.

NOTE

In order to prevent interference with fire fighting efforts, repeated exits from the RCA **WITHOUT** frisking is permitted.

19. All clothing and equipment which is not permitted to be removed from the RCA due to contamination should be inventoried for compensation.

 IPEC SITE EMERGENCY PLAN IMPLEMENTING PROCEDURE	NON-QUALITY RELATED PROCEDURE	IP-1055 Revision 19
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Attachment 9.2

Security Fire Response

Page 1 of 1

1. **DIRECT** responding personnel and offsite fire fighters and accompanying apparatus' through the nearest gate to the fire area.
2. **IF** responding to the fire, **THEN** wear a SCBA.
3. **EVACUATE** unnecessary personnel from the fire area.
4. **IF** fire is located in the RCA, **THEN** do the following:
 - **ENSURE** access for Fire Brigade at HP Control Point .
 - **ENSURE** the Fire Truck is given the Fire Fighter Kit located at the Main Gate Security Station.

10CFR50.54(Q)(2) Review

Procedure/Document Number: IP-EP-120

Revision: 14

Equipment/Facility/Other: Indian Point Energy Center

Title: Emergency Classification

Part I. Description of Activity Being Reviewed (event or action, or series of actions that have the potential to affect the emergency plan or have the potential to affect the implementation of the emergency plan):

Procedure was revised, to reflect the requirement in the Post Unit 2 Shutdown Eplan (PSEP), as submitted to the NRC per LAR, license #NL-19-001. See attached matrix for changes made. Procedure will be effective on June 1, 2020,

Part II. Emergency Plan Sections Reviewed (List all emergency plan sections that were reviewed for this activity by number and title. IF THE ACTIVITY IN ITS ENTIRETY IS AN EMERGENCY PLAN CHANGE, EAL CHANGE OR EAL BASIS CHANGE, ENTER THE SCREENING PROCESS. NO 10CFR50.54(q)(2) DOCUMENTATION IS REQUIRED.

Part 1 Introduction:

Section A: Purpose

Part 2 Planning Standards and Criteria:

Section A: Assignment of Responsibility

Section B: Station Emergency Response Organization

Section D: Emergency Classification System

Part III. Ability to Maintain the Emergency Plan (Answer the following questions related to impact on the ability to maintain the emergency plan):

1. Do any elements of the activity change information contained in the emergency plan (Section 3.0 Step 6)?
YES NO IF YES, enter screening process for that element
2. Do any elements of the activity change an emergency classification Initiating Condition, Emergency Action Level (EAL), associated EAL note or associated EAL basis information or their underlying calculations or assumptions?
YES NO IF YES, enter screening process for that element
3. Do any elements of the activity change the process or capability for alerting and notifying the public as described in the FEMA-approved Alert and Notification System design report?
YES NO IF YES, enter screening process for that element
4. Do any elements of the activity change the Evacuation Time Estimate results or documentation?
YES NO IF YES, enter screening process for that element
5. Do any elements of the activity change the Onshift Staffing Analysis results or documentation?
YES NO IF YES, enter screening process for that element

10CFR50.54(Q)(2) Review

Procedure/Document Number: IP-EP-120	Revision: 14
Equipment/Facility/Other: Indian Point Energy Center	
Title: Emergency Classification	

Part IV. Maintaining the Emergency Plan Conclusion The questions in Part III do not represent the sum total of all conditions that may cause a change to or impact the ability to maintain the emergency plan. Originator and reviewer signatures in Part V document that a review of all elements of the proposed change have been considered for their impact on the ability to maintain the emergency plan and their potential to change the emergency plan.

1. Provide a brief conclusion that describes how the conditions as described in the emergency plan are maintained with this activity.
 2. Check the box below when the 10CFR50.54(q)(2) review completes all actions for all elements of the activity – no 10CFR50.54(q)(3) screening or evaluation is required for any element. Otherwise, leave the checkbox blank.
- I have completed a review of this activity in accordance with 10CFR50.54(q)(2) and determined that the effectiveness of the emergency plan is maintained. This activity does not make any changes to the emergency plan. No further actions are required to screen or evaluate this activity under 10CFR50.54(q)(3).

Per Post Shutdown Emergency Plan (PSEP), Unit 3 CCR will be the active/running plant and Unit 2 will be at shut down. Unit 3 CCR will be the lead plant for making initial declarations that affect both Units. The changes made to this procedure (see attached matrix) reflects this requirement of the Post Unit 2 Shutdown Eplan, as submitted to the NRC (license # NL-19-001) and some minor editorial adjustments. The NRC has approved the PSEP per RA-20-040.

A review of this activity in accordance with 10 CFR 50.54(q)(2) has been completed and determined that the effectiveness of the PSEP is maintained. This revision aligns the procedure with the protocols of the post Unit 2 shutdown. None of the changes affect the ability to perform classifications, notifications, or PARs, it does not affect activation or staffing of the ERO, and all planning standard requirements are maintained. The changes made do not require a change to the Emergency Action Level scheme, On-shift Staffing study or the PSEP.

No further actions are required to screen or evaluate this activity under 10 CFR 50.54(q)(3).

Part V. Signatures:

Preparer Name (Print) Rebecca A. Martin	Preparer Signature <i>Rebecca A. Martin</i>	Date: 5/14/2020
(Optional) Reviewer Name (Print)	Reviewer Signature	Date:
Reviewer Name (Print) Timothy Garvey Nuclear EP Project Manager	Reviewer Signature <i>Rebecca A. Martin for T. Garvey</i> Approved Per Telecom	Date: 5/14/2020
Approver Name (Print) Frank Mitchell Emergency Planning Manager or designee	Approver Signature <i>F. Mitchell</i>	Date: 5/15/2020

IP-EP-120 Revision 14 REVISION MATRIX

Change No.	Page/Section	Previous Version	New Version	Editorial Change	Effect on 10 CFR 50.47(b) Planning Standards or NUREG-0654 program elements? Justify if NO.
1.	Page 3 Section 4.1	<p>The Shift Manager (Control Room Supervisor if the Shift Manager is unavailable or incapacitated) of the affected unit shall implement this procedure for the initial emergency classification. For classifiable events that potentially impact both units (security, natural or man-made events), the Shift Managers for each unit shall confer about the need to classify the event. If it is determined that emergency classification is warranted, the Unit 2 Shift Manager shall declare the event in accordance with this procedure. Once an initial emergency classification has been made, the unit Shift Manager making the initial declaration shall be responsible for any subsequent emergency classifications, regardless of which unit is affected, until such time as relieved by the on-call Emergency Director.</p>	<p>4.1 The Unit 3 Shift Manager (Control Room Supervisor if the Shift Manager is unavailable or incapacitated) shall implement this procedure for the initial emergency classification. For classifiable events that potentially impact both units (security, natural or man-made events), the Unit 3 Shift Manager will confer with the Unit 2 Shift Manager (if they are available) and SHALL declare the event in accordance with this procedure. Once an initial emergency classification has been made, the Unit 3 Shift Manager making the initial declaration shall be responsible for any subsequent emergency classifications, regardless of which unit is affected, until such time as relieved by the on-call Emergency Director.</p>	N	<p>N – Per Decommissioning Emergency Plan, Unit 3 CCR will be the active/running plant and Unit 2 will be at shut down. Unit 3 CCR will be lead plant for making initial declarations that affect both Units. This change reflects that requirement in the Post Unit 2 shut down Eplan, which is under an LAR. (license # NL-19-001) NRC approved per RA-20-040.</p>

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2.	Page 3 Section 4.2	See change #1 previous version...this change was split into 2 separate sections.	4.2 The Unit 2 Shift Manager (Certified Fuel Handler) shall implement this procedure for any related decommissioning initial emergency classifications. The Unit 2 Shift Manager will confer with the Unit 3 Shift Manager about the need to classify the event.	N	N - Per Decommissioning Emergency Plan, Unit 3 CCR will be the active/running plant and Unit 2 will be at shut down. Unit 2 CCR will continue to make initial declarations that affect Unit 2. This change reflects that requirement in the Post Unit 2 shut down Eplan, which is under an LAR. (license # NL-19-001) NRC approved per RA-20-040.
3.	Page 5, Note	None	2. For Unit 2, not all EALs (Attachment 9.1) are applicable post shut down. Validate applicable EALs via EAL Wall-Chart.	N	N - Per Decommissioning EPlan, Unit 2 will have limited EALs. This Note was added to remind Unit 2 staff of expectations. (license # NL-19-001) NRC approved per RA-20-040.
4.	Page 6, Note 2	IF the condition or event requiring initial classification potentially affects both units (security, natural or man-made events), THEN the Unit Shift Managers shall contact each other and confer on the need to declare. Upon concurrence, the Unit 2 Shift Manager shall make the appropriate emergency classification and assume the role of Emergency Director.	IF the condition or event requiring initial classification potentially affects both units (security, natural or man-made events), THEN the Unit Shift Managers shall contact each other (if available) and confer on the need to declare. Upon concurrence, the Unit 3 Shift Manager shall make the appropriate emergency classification and assume the role of Emergency Director.	N	N - Per Decommissioning Emergency Plan, Unit 3 CCR will be the active/running plant and Unit 2 will be at shut down. Unit 3 CCR will be lead plant for making initial declarations that affect both Units. This change reflects that requirement in the Post Unit 2 shut down Eplan, which is under an LAR. (license # NL-19-001) NRC approved per RA-20-040.
5.	Page 6 Section 5.2.1	5.2.1 The Shift Manager (Control Room Supervisor if the Shift Manager is unavailable or incapacitated) shall announce to the Control Room operating staff	5.2.1 The Shift Manager (U3 Control Room Supervisor if the U3 Shift Manager is unavailable or incapacitated) shall announce to the Control Room operating staff:	N	N - Per Decommissioning EPlan, the U3 CRS is designated at the backup for the U3 SM. Unit 2 no longer lists a backup in the emergency plan. (license # NL-19-001) NRC approved per RA-20-040.

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6.	Page 6 Section 5.2.1 C	That the (Unit 2 or Unit 3) Shift Manager (Control Room Supervisor if the Shift Manager is unavailable or incapacitated) has assumed the role of Emergency Director.	That the (Unit 2 or Unit 3) Shift Manager (U3 Control Room Supervisor if the U3 Shift Manager is unavailable or incapacitated) has assumed the role of Emergency Director.	N	N – Per Decommissioning EPlan, the U3 CRS is designated at the backup for the U3 SM. Unit 2 no longer lists a backup in the emergency plan. (license # NL-19-001) NRC approved per RA-20-040.
7.	Page 7 Section 5.3.1	(Attachment 1)	(Attachment 9.1)	Y	N – fixed typo.



Attachment 9.1

Emergency Planning Document Change Checklist Form

(All sections must be completed, N/A or place a check on the line where applicable)

Section 1

Doc/Procedure Type:	Administrative <input type="checkbox"/> Implementing <input checked="" type="checkbox"/> EPLAN <input type="checkbox"/> N/A <input type="checkbox"/>
Doc/Procedure No:	IP-EP-120
Doc/Procedure Title:	Emergency Classification
New revision number:	14
Corrective Action:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> CR#: OL-OLI-2018-00090 CA 18
Effective date:	June 1, 2020

Section 2

Change Description

1. Ensure the following are completed, or are not applicable and are so marked:

- a. 50.54q N/A
- b. EN-FAP-OM-023 N/A
- c. IP-SMM- AD-102 N/A
- d. OSRC N/A
- e. NRC Transmittal N/A
(within 30 days)

2. List any other documents affected by this change: N/A

3. Transmittals are completed: N/A Date: 5/19/2020

4. Ensure the proper revision is active in eB Ref. Lib.: N/A

5. Approved doc/procedure delivered to Doc. Control for distribution: N/A Date: 5/20/2020

6. Position Binders updated: N/A Date: 6/1/20

7. Copy of EPDCC placed in EP file: N/A Date: _____

8. Supporting documentation is submitted as a general record in eB Ref. Lib.: N/A Date: 5/20/2020

9. Word files are moved from working drafts folder to current revision folder in the EP drive:
 N/A Date: 6/1/2020

IPEC IMPLEMENTING PROCEDURE PREPARATION, REVIEW, AND APPROVAL

IP-SMM-AD-102 Rev:17

Page 35 of 43

ATTACHMENT 10.2

IPEC PROCEDURE REVIEW AND APPROVAL

(Page 1 of 1)

Procedure Title: Emergency Classification

Procedure No: IP-EP-120 Existing Rev: 13 New Rev: 14 DRN/EC No: DRN-20-00304

Procedure Activity (MARK Applicable)	<input type="checkbox"/> Converted To IPEC, Replaces: Unit 1 Procedure No: _____ Unit 2 Procedure No: _____ Unit 3 Procedure No: _____	Temporary Procedure Change (MARK Applicable)
<input type="checkbox"/> NEW PROCEDURE <input type="checkbox"/> GENERAL REVISION <input checked="" type="checkbox"/> PARTIAL REVISION <input type="checkbox"/> EDITORIAL REVISION <input type="checkbox"/> VOID PROCEDURE <input type="checkbox"/> SUPERSEDED		<input type="checkbox"/> EDITORIAL Temporary Procedure Change <input type="checkbox"/> ADVANCE Temporary Procedure Change <input type="checkbox"/> CONDITIONAL Temporary Procedure Change Terminating Condition: _____
<input type="checkbox"/> RAPID REVISION	Document in Microsoft Word: <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> VOID DRN/TPC No(s): _____

Revision Summary N/A - See Revision Summary Matrix

Implementation Requirements

Implementation Plan? Yes No Formal Training? Yes No Special Handling? Yes No

RPO Dept: Emergency Planning Writer (Print Name/ Ext/ Sign): Rebecca A. Martin/x7106/ Rebecca A Martin

Review and Approval (Per Attachment 10.1, IPEC Review And Approval Requirements)

1. Technical Reviewer: P. D. W. S. W. [Signature] 5-14-2010
 (Print Name/ Signature/ Date)

2. Cross-Disciplinary Reviewers:
 Dept: _____ Reviewer: _____
 (Print Name/ Signature/ Date)

Dept: _____ Reviewer: _____
 (Print Name/ Signature/ Date)

3. RPO- Responsibilities/Checklist: F. Mitchell [Signature] 5/15/2010
 (Print Name/ Signature/ Date)

- PAD required and is complete (PAD Approver and Reviewer qualifications have been verified)
- Previous exclusion from further LI-100 Review is still valid
- PAD not required due to type of change as defined in 4.6

4. Non-Intent Determination Complete: _____
 (Print Name/ Signature/ Date)

- NO change of purpose or scope
- NO change to less restrictive acceptance criteria
- NO reduction in the level of nuclear safety
- NO change to steps previously identified as commitment steps
- NO voiding or canceling of a procedure, unless requirements are incorporated into another procedure or the need for the procedure was eliminated via an alternate process.
- NO deviation from the Quality Assurance Program Manual
- NO change that may result in deviations from Technical Specifications, FSAR, plant design requirements or previously made commitments.

5. On-Shift Shift Manager/CRS: _____
 (Print Name/ Signature/ Date)

6. User Validation: User: _____

7. Special Handling Requirements Understood: _____



ENN IPEC
EMERGENCY PLAN
IMPLEMENTING
PROCEDURES

NON-QUALITY RELATED
PROCEDURE

REFERENCE USE

IP-EP-120

Revision 14

Page 1 of 50

CONTROLLED

Emergency Classification

Prepared by:

Rebecca A. Martin

Print Name

Rebecca A. Martin

Signature

5/14/2020

Date

Approval:

Frank J. Mitchell

Print Name

F. Mitchell

Signature

5/15/2020

Date

Effective Date: June 1, 2020

This procedure excluded from further EN-LI-100 reviews.



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Emergency Classification

1.0 PURPOSE

To describe the method for classification of emergencies at IPEC as a Notification of Unusual Event (NUE), Alert, Site Area Emergency (SAE) or General Emergency (GE). It also described actions to take regarding Out-of-Service instruments that are used to evaluate EAL's.

2.0 REFERENCES

- 2.1 Indian Point Energy Center Emergency Plan
- 2.2 NEI 99-01 Rev 5, Methodology for Development of Emergency Action Levels
- 2.3 IP-EP-AD13 IPEC Emergency Action Level Technical Bases
- 2.4 IP-EP-AD40 Equipment Important to Emergency Response
- 2.5 Hot Conditions EAL Chart
- 2.6 Cold Conditions EAL Chart

3.0 DEFINITIONS

Refer to Reference 2.3

4.0 RESPONSIBILITIES

- 4.1 The Unit 3 Shift Manager (Control Room Supervisor if the Shift Manager is unavailable or incapacitated) shall implement this procedure for the initial emergency classification. For classifiable events that potentially impact both units (security, natural or man-made events), the Unit 3 Shift Manager will confer with the Unit 2 Shift Manager (if they are available) and SHALL declare the event in accordance with this procedure. Once an initial emergency classification has been made, the Unit 3 Shift Manager making the initial declaration shall be responsible for any subsequent emergency classifications, regardless of which unit is affected, until such time as relieved by the on-call Emergency Director.
- 4.2 The Unit 2 Shift Manager (Certified Fuel Handler) shall implement this procedure for any related decommissioning initial emergency classifications. The Unit 2 Shift Manager will confer with the Unit 3 Shift Manager about the need to classify the event.
- 4.3 The Shift Manager, upon initial emergency classification, shall assume the role of Emergency Director and shall act as the Emergency Director until relieved by the On-Call Emergency Director or other qualified Emergency Director (Plant Operations Manager).
- 4.4 The Emergency Director is responsible for overall command and control of the emergency response, including classifications; notifications, PARs and ensuring all resources are available to mitigate emergency conditions. The Emergency Director is



the final authority for determining the emergency classification level (initial classification, upgrading, or terminating to recovery). This authority may not be delegated.

- 4.5 Initial and subsequent emergency classification shall be made within 15 minutes following the identification of a classifiable event to ensure that prompt notification, mobilization, protective and corrective actions are taken.
- 4.6 Upon becoming aware of any condition or event that they believe may warrant an upgrade in emergency classification, Emergency Response Organization members shall promptly inform the Emergency Director via their chain of command.
- 4.7 A broad spectrum of discretion in classifying events is provided under "Hazards" Sub-Category 6.0 "Judgement". In using the Sub-Category "Judgement" and in classifying emergencies under circumstances which are not a straight-forward use of the EALs, ERO members should be mindful that an approach is needed which is conservative with respect to public, plant, and personnel safety and with respect to ensuring the adequacy of personnel and technical support. Conservative decisions must be made if the Emergency Director has any doubt regarding the health and safety of the public.



5.0 DETAILS

5.1 Recognizing an Emergency

NOTE

1. All classifications are to be based upon VALID indications, reports or conditions. Indications, reports or conditions are considered VALID when they are verified by (1) an instrument channel check, or (2) indications on related or redundant indicators, or (3) by direct observation by plant personnel, such that doubt related to the indicator's operability, the condition's existence, or the report's accuracy is removed. Implicit in this definition is the need for timely assessment.

2. For Unit 2, not all EALs (Attachment 9.1) are applicable post shut down. Validate applicable EALs via EAL Wall Chart.

5.1.1 When indications of abnormal conditions or events are received, personnel will verify the symptoms/indications and then compare with the Emergency Action Levels (Attachment 9.1).

5.1.2 Identify the highest applicable emergency classification level (if multiple EALs are exceeded) for which an EAL has been met or exceeded considering the following:

(a) The plant condition existing at the time the abnormal condition exists:

- All Operating Modes 1, 2, 3, 4, 5,6, DEF
- Hot Condition Modes 1, 2, 3, 4
- Cold Condition Modes 5, 6, DEF

(b) IF conditions warrant the issuance of offsite Protective Action Recommendations (PARs), THEN the classification of General Emergency is required.

(c) IF plant conditions indicate a possible radiological release or a release is in progress or suspected, THEN evaluate the applicability of offsite dose-based EALs (IP-EP-310, Dose Assessment).



NOTE

The term 'Release' as it is used at IPEC for Emergency Planning is defined as "A release of radioactive materials due to the classified event" (per NYS Radiological Emergency Data Form, Part 1).

In accordance with the Part 1 form, "Release" is classified as one of the 4 following descriptions:

- A. NO Release
- B. Release BELOW Federal Limits
- C. Release ABOVE Federal Limits
- D. Unmonitored Release Requiring Evaluation

- (d) **IF** a classification level was met or exceeded but the classifiable condition no longer exists (a lesser classification level may or may not still be appropriate), **THEN** refer to Section 5.4, Transitory Events, Spikes and Spurious Indications.

5.2 Initial Emergency Declaration from the Control Room

NOTE

IF the condition or event requiring initial classification potentially affects both units (security, natural or man-made events), **THEN** the Unit Shift Managers shall contact each other (if available) and confer on the need to declare. Upon concurrence, the **Unit 3** Shift Manager shall make the appropriate emergency classification and assume the role of Emergency Director.

5.2.1 The Shift Manager (U3 Control Room Supervisor if the U3 Shift Manager is unavailable or incapacitated) shall announce to the Control Room operating staff:

- (a) That an emergency has been declared.
- (b) The emergency classification level.
- (c) That the (Unit 2 or Unit 3) Shift Manager (U3 Control Room Supervisor if the U3 Shift Manager is unavailable or incapacitated) has assumed the role of Emergency Director.

5.2.2 Implement procedure IP-EP-210 "Central Control Room"



5.3 While in a Classified Emergency

5.3.1 Emergency response personnel shall continuously review the Emergency Action Levels (Attachment 9.1).

5.3.2 If an Emergency Action Level threshold is exceeded for an emergency classification higher than currently declared, the Emergency Director shall re-classify the event to the appropriate level and initiate all required notifications.

5.4 Transitory Events, Spikes and Spurious Indications

5.4.1 Transitory events that result in exceeding the Emergency Action Level criteria for event declaration, but which are terminated before they are declared, should still be identified, documented and reported (10CFR50.72), but not declared to implement the Emergency Plan.

5.4.2 In the case of a "spike" in a plant indication or event which rapidly exceeds and then decreases below an Emergency Action Level threshold, entry into the Emergency Plan or escalation to a higher classification "in retrospect" is not appropriate unless the "spike" is indicative of continuing degrading conditions which will lead to an escalated emergency classification level. Examples include momentary steam generator level shrink following reactor trip or brief wind gusts in excess of classifiable levels.

5.4.3 Spurious alarms or parameters, which are known to be invalid indicators of actual plant conditions or of the emergency classification, should not be used to declare emergency classifications.

5.5 Compensatory Measures for Out-of-Service EAL Instruments.

5.5.1 IP-EP-AD40 provides guidance when planning to take an instrument OOS (Out of Service) that is used to determine an EAL condition or following an unplanned loss of the instrument.

6.0 INTERFACES

6.1 IP-EP-210, Central Control Room

6.2 EN-EP-610, Technical Support Center (TSC) Operations

6.3 IP-EP-310, Dose Assessment

6.4 IP-EP-410, Protective Action Recommendations

6.5 IP-EP-510, Meteorological, Radiological & Plant Data Acquisition System

6.6 IP-EP-340, Meteorological Information & Data Acquisition System (MIDAS)



6.7 IP-EP-AD40, Equipment Important to Emergency Response

7.0 RECORDS

Any logs or forms completed by members of the ERO during an actual declared emergency are permanent quality records.

8.0 REQUIREMENTS AND COMMITMENTS

NONE

9.0 ATTACHMENTS

9.1 Emergency Action Levels



9.1 - Emergency Action Levels

CATEGORY "A" Abnormal Rad Release / Rad Effluent

Sub-Category	General	Site Area	Alert	Unusual Event																																																																																				
1. Offsite Rad Conditions	<p>AG 1.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Any valid radiation monitor reading > Table A-1 column "GE" for ≥ 15 min. (Note 1)</p> <p>AG 1.2</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Dose assessment using actual meteorology indicates doses > 1000 mRem TEDE or > 5000 mRem thyroid CDE at or beyond the site boundary.</p> <p>AG 1.3</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Field survey results indicate closed window dose rates > 1000 mRem/hr. expected to continue for ≥ 1 hr at or beyond the site boundary</p> <p>OR</p> <p>Anakyses of field survey samples indicate thyroid CDE of > 5000 mRem for 1 hr of inhalation at or beyond the site boundary</p>	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF	<p>AS 1.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Any valid radiation monitor reading > Table A-1 column "SAE" for ≥ 15 min. (Note 1)</p> <p>AS 1.2</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Dose assessment using actual meteorology indicates doses > 100 mRem TEDE or > 500 mRem thyroid CDE at or beyond the site boundary</p> <p>AS 1.3</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Field survey indicates closed window dose rate > 100 mRem/hr. that is expected to continue for ≥ 1 hr at or beyond the site boundary</p> <p>OR</p> <p>Field survey sample analysis indicates thyroid CDE of > 500 mRem for 1 hr of inhalation at or beyond the site boundary</p>	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF	<p>AA 1.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Any valid gaseous monitor reading > Table A-1 column "Alert" for ≥ 15 min. (Note 2)</p> <p>AA 1.2</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Any valid liquid monitor reading > Table A-1 column "Alert" for ≥ 15 min. (Note 2)</p> <p>AA 1.3</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Confirmed sample analyses for gaseous or liquid releases indicate concentrations or release rates > 200 x Technical Specification (ODCM) limits for ≥ 15 min. (NOTE 2)</p>	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF	<p>AU 1.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Any valid gaseous monitor reading > Table A-1 column "UE" for ≥ 60 min. (Note 2)</p> <p>AU 1.2</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Any valid liquid monitor reading > Table A-1 column "UE" for ≥ 60 min. (Note2)</p> <p>AU 1.3</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Confirmed sample analyses for gaseous or liquid releases indicate concentrations or release rates > 2 x Technical Specifications (ODCM) limits for ≥ 60 min. (Note 2)</p>	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF
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9.1 - Emergency Action Levels

CATEGORY "A" Abnormal Rad Release / Rad Effluent

Sub-Category	General	Site Area	Alert	Unusual Event																												
2. Onsite Rad Conditions & Irradiated Fuel Events			<p>AA 2.1</p> <table border="1" data-bbox="1059 508 1438 548"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Damage to irradiated fuel or loss of water level (uncovering irradiated fuel outside the Reactor Vessel) that causes a valid high alarm on any of the following radiation monitors:</p> <ul style="list-style-type: none"> - R-2/R7 Vapor Containment Area Monitors - R-5 Fuel Storage Bldg. Area Monitors -R-42 [R-12] VC Gas Activity -R-25/R-26 Vapor Containment High Radiation Area Monitors <p>AA 2.2</p> <table border="1" data-bbox="1059 998 1438 1039"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>A water level drop in the reactor cavity, SFP or fuel transfer canal that will result in irradiated fuel becoming uncovered</p>	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF	<p>AU 2.1</p> <table border="1" data-bbox="1542 508 1964 548"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Unplanned low water level or alarm indicating uncontrolled water level decrease in the refueling cavity, SFP or fuel transfer canal</p> <p>AND</p> <p>Valid area radiation monitor reading rise on any of the following:</p> <ul style="list-style-type: none"> - R2/R7 Vapor Containment Area Monitors - R-5 Fuel Storage Bldg. Area Monitors - R25/R-26 Vapor Containment High Radiation Area Monitors <p>AU 2.2</p> <table border="1" data-bbox="1542 1117 1964 1157"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Unplanned valid area radiation monitor reading or survey results increase by a factor of 1,000 over normal levels*</p> <p>* Normal levels can be considered as the highest reading in the past 24 hours excluding the current peak value</p>	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										



9.1 - Emergency Action Levels
CATEGORY "A" Abnormal Rad Release / Rad Effluent

Sub-Category	General	Site/Area	Alert	Unusual Event							
<p>3 CR/CAS Radiation</p>			<p>AA 3.1</p> <table border="1" data-bbox="1051 532 1549 581"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td>5</td> <td>6</td> <td>DEF</td> </tr> </table> <p>Dose rates > 15 mRem/hr in areas requiring continuous occupancy to maintain plant safety functions:</p> <p>Control Room [R-1]</p> <p>OR</p> <p>CAS</p>	1	2	3	4	5	6	DEF	
1	2	3	4	5	6	DEF					



9.1 - Emergency Action Levels
TABLE A-1 EFFLUENT MONITOR CLASSIFICATION THRESHOLDS

Monitor		General Emergency	Site Area Emergency	ALERT	Unusual Event
Gaseous	R-27	7.5 E+07 $\mu\text{Ci}/\text{sec}$ (2.3 E+00 $\mu\text{Ci}/\text{cc}$)	7.5 E+06 $\mu\text{Ci}/\text{sec}$ (2.3 E-01 $\mu\text{Ci}/\text{cc}$)	1.4 E+06 $\mu\text{Ci}/\text{sec}$ (4.2 E-02 $\mu\text{Ci}/\text{cc}$)	2.6 E+05 $\mu\text{Ci}/\text{sec}$ (8.0 E-03 $\mu\text{Ci}/\text{cc}$)
	R-44 [14]	N/A	N/A	4.2 E-02 $\mu\text{Ci}/\text{cc}$	8.0 E-03 $\mu\text{Ci}/\text{cc}$
Liquid	R-54 [18]	N/A	N/A	4.0E-02 $\mu\text{Ci}/\text{cc}$	2.5E-03 $\mu\text{Ci}/\text{cc}$
	R-49 [19]	N/A	N/A	5.8E-02 $\mu\text{Ci}/\text{cc}$	5.8E-04 $\mu\text{Ci}/\text{cc}$



9.1 - Emergency Action Levels

CATEGORY "H" HAZARDS

Sub-Category	General	Site Area	Alert	Unusual Event																												
1 Natural & Destructive Phenomena			<p>HA 1.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td>5</td> <td>6</td> <td>DEF</td> </tr> </table> <p>Two or more annunciators are lit on the Peak Shock Annunciator panel, one of which is red</p> <p>AND Strong Motion Event Indicator is lit</p> <p>AND Earthquake confirmed by any of the following:</p> <ul style="list-style-type: none"> - Earthquake felt in plant by a consensus of Control Room Operators - National Earthquake Information Center (Note 4) - Control Room indication of degraded performance of systems required for the safe shutdown of the plant <p>HA 1.2</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td>5</td> <td>6</td> <td>DEF</td> </tr> </table> <p>Tornado striking or sustained high winds > 90 mph (40 m/sec) resulting in EITHER:</p> <p>Visible damage to any Table H-1 plant structures containing safety systems or components</p> <p>OR</p>	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF	<p>HU 1.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td>5</td> <td>6</td> <td>DEF</td> </tr> </table> <p>Seismic event indentified by any two of the following:</p> <ul style="list-style-type: none"> - Earthquake felt in plant by consensus of Control Room Operators - Unit 3 "Seismic Event Occurred" alarm (Panel SDF) or any amber Peak Shock Annunciator light is lit - National Earthquake Information Center (Note 4) <p>HU 1.2</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td>5</td> <td>6</td> <td>DEF</td> </tr> </table> <p>Tornado striking within Protected Area boundary</p> <p>OR</p> <p>Sustained high winds > 90 mph (40 m/sec)</p>	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										



9.1 - Emergency Action Levels

CATEGORY "H" HAZARDS

Sub-Category	General	Site Area	Alert	Unusual Event																												
<p>1</p> <p>Natural & Destructive Phenomena (continued)</p>			<p>HA 1.2 (cont.)</p> <p>Control Room indication of degraded performance of safety systems</p> <p>HA 1.3</p> <table border="1" data-bbox="1066 623 1501 656"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Vehicle crash resulting in Either:</p> <p>Visible damage to any Table H-1 plant structures containing safety systems or components</p> <p>OR</p> <p>Control Room indication of degraded performance of safety systems</p> <p>HA 1.4</p> <table border="1" data-bbox="1066 971 1501 1003"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Turbine failure-generated projectiles resulting in Either:</p> <p>Visible damage to or penetration of any Table H-1 area containing safety systems or components</p> <p>OR</p> <p>Control Room indication of degraded performance of safety systems</p>	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF	<p>HU 1.3</p> <table border="1" data-bbox="1539 646 1936 678"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Turbine failure resulting in EITHER:</p> <p>Casing penetration</p> <p>OR</p> <p>Damage to turbine or generator seals</p> <p>HU 1.4</p> <table border="1" data-bbox="1539 1010 1936 1042"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Flooding in any Table H-1 area that has the potential to affect safety-related equipment needed for the current operating mode</p>	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										



9.1 - Emergency Action Levels

CATEGORY "H" HAZARDS

Sub-Category	General	Site Area	Alert	Unusual Event																					
<p>1 Natural & Destructive Phenomena</p>			<p>HA 1.5</p> <table border="1" data-bbox="1066 521 1503 557"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Flooding in any Table H-1 area resulting in Either:</p> <p>An electrical shock hazard that precludes necessary access to operate or monitor safety equipment</p> <p>OR</p> <p>Control room indication of degraded performance of safety systems</p> <p>HA 1.6</p> <table border="1" data-bbox="1066 922 1503 958"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>River Water Level > 15 ft. (ØMSL)</p> <p>OR</p> <p>Low Service Water Bay (Intake Structure) level resulting in a loss of service water flow</p>	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF	<p>HU 1.5</p> <table border="1" data-bbox="1539 906 1940 941"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>River Water Level > 14 ft. 6 in. (ØMSL)</p> <p>OR</p> <p>Service Water Bay (Intake Structure) water level < -4 ft. 5 in. (ØMSL)</p>	1	2	3	4	5	6	DEF
1	2	3	4	5	6	DEF																			
1	2	3	4	5	6	DEF																			
1	2	3	4	5	6	DEF																			



9.1 - Emergency Action Levels

Table H-1 Safe Shutdown Areas

TABLE H-1 SAFE SHUTDOWN AREAS

- Control Building and associated Electrical Tunnels and Battery Rooms
- Service Water Pump Structure and Valve Pits
- Fuel Storage Building
- Primary Auxiliary Building / Fan House
- Vapor Containment Building
- EDG Buildings
- Auxiliary Feed Pump Building
- Condensate Storage Tank
- Refueling Water Storage Tank



9.1 - Emergency Action Levels

CATEGORY "H" HAZARDS

Sub-Category	General	Site Area	Alert	Unusual Event																					
2 Fire or Explosion			<p>HA 2.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Fire or explosion resulting in EITHER: Visible damage to any Table H-1 area containing safety systems or components OR Control Room Indication of degraded performance of safety systems</p>	1	2	3	4	5	6	DEF	<p>HU 2.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Fire in any Table H-1 area not extinguished within 15 minutes (Note 3) of Control Room notification or verification of a control room fire alarm HU 2.2</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Explosion within Protected Area boundary</p>	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF
1	2	3	4	5	6	DEF																			
1	2	3	4	5	6	DEF																			
1	2	3	4	5	6	DEF																			
3 Hazardous Gas			<p>HA 3.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Access to any Table H-2 area is prohibited due to toxic, corrosive, asphyxiant or flammable gases which jeopardize operation of systems required to maintain safe operations or safety shut down the reactor</p>	1	2	3	4	5	6	DEF	<p>HU 3.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Toxic, corrosive, asphyxiant or flammable gases in amounts that have or could adversely affect normal plant operations HU 3.2</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Recommendation by local, county or state officials to evacuate or shelter site personnel based on offsite event</p>	1	2	3	4	5	6	DEF	1	2	3	4	5	6	DEF
1	2	3	4	5	6	DEF																			
1	2	3	4	5	6	DEF																			
1	2	3	4	5	6	DEF																			



9.1 - Emergency Action Levels

Table H-2 Safe Shutdown Access Areas

TABLE H-2 SAFE SHUTDOWN ACCESS AREAS

- | |
|---|
| <ul style="list-style-type: none">- Control Building and associated Electrical Tunnels and Battery Rooms- Service Water Pump Structure and Valve Pits- Vapor Containment Building- Primary Auxiliary Building / Fan House- Auxiliary Feed Pump Building |
|---|



9.1 - Emergency Action Levels

CATEGORY "H" HAZARDS

Sub-Category	General	Site Area	Alert	Unusual Event																												
4 Security	<p>HG 4.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>A hostile action has occurred such that plant personnel are unable to operate equipment required to maintain safety functions</p> <p>OR</p> <p>A hostile action has caused failure of Spent Fuel Cooling Systems and imminent damage is likely</p>	1	2	3	4	5	6	DEF	<p>HS 4.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>A hostile action is occurring or has occurred within the Protected Area as reported by the Security Shift Supervisor</p>	1	2	3	4	5	6	DEF	<p>HA 4.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>A hostile action is occurring or has occurred within the Owner Controlled Area as reported by the Security Shift Supervisor</p> <p>OR</p> <p>A validated notification from NRC of an airliner attach threat within 30 minutes of the site</p>	1	2	3	4	5	6	DEF	<p>HU 4.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>A security condition that does not involve a hostile action as reported by the Security Shift Supervisor</p> <p>OR</p> <p>A credible site-specific security threat notification</p> <p>OR</p> <p>A validated notification from NRC providing information of an aircraft threat</p>	1	2	3	4	5	6	DEF
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										
5 Control Room Evacuation		<p>HS 5.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Control Room evacuation has been initiated</p> <p>AND</p> <p>Control of the plant cannot be established within 15 minutes</p>	1	2	3	4	5	6	DEF	<p>HA 5.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Control Room evacuation initiated</p>	1	2	3	4	5	6	DEF															
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										



9.1 - Emergency Action Levels

CATEGORY "H" HAZARDS

Sub-Category	General	Site Area	Alert	Unusual Event																												
6 Judgment	<p>HG 6.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Other conditions exist that in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve EITHER:</p> <p>Actual or imminent substantial core degradation or melting with potential for loss of containment integrity</p> <p>OR</p> <p>Hostile action that results in an actual loss of physical control of the facility</p> <p>Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels (1 Rem TEDE and 5 Rem thyroid CDE) beyond the site boundary</p>	1	2	3	4	5	6	DEF	<p>HS 6.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Other conditions exist that in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve EITHER:</p> <p>An actual or likely major failures of plant functions needed for protection of the public</p> <p>OR</p> <p>Hostile action that results in intentional damage or malicious acts; 1) toward site personnel or equipment that could lead to the likely failure of or; 2) that prevent effective access to equipment needed for the protection of the public</p> <p>ANY releases are not expected to result in exposure levels which exceed EPA Protective Action Guidelines exposure levels (1Rem TEDE and 5 Rem thyroid CDE) beyond the site boundary</p>	1	2	3	4	5	6	DEF	<p>HA 6.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Other conditions exist that in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve EITHER:</p> <p>An actual or potential substantial degradation of the level of safety of the plant</p> <p>OR</p> <p>A security event that involves probable life threatening risk to site personnel or damage to site equipment because of hostile action</p> <p>Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels beyond the site boundary</p>	1	2	3	4	5	6	DEF	<p>HU 6.1</p> <table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td> </tr> </table> <p>Other conditions exist that in the judgment of the Emergency Director indicate that events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs</p>	1	2	3	4	5	6	DEF
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										
1	2	3	4	5	6	DEF																										



9.1 Emergency Action Levels

CATEGORY "E" ISFSI

Sub-Category	General	Site Area	Alert	Unusual Event							
1 ISFSI				<p>EU 1.1</p> <table border="1"><tr><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>DEF</td></tr></table> <p>Damage to loaded cask confinement boundary</p>	1	2	3	4	5	6	DEF
1	2	3	4	5	6	DEF					



9.1 - Emergency Action Levels

CATEGORY "S" SYSTEM MALFUNCTION

Sub-Category	General	Site Area	Alert	Unusual Event																												
<p>1</p> <p>Loss of AC Power</p>	<p>SG 1.1</p> <table border="1" data-bbox="310 578 653 623"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td></td><td></td><td></td> </tr> </table> <p>Loss of all offsite and all onsite AC power (Table S-1) to 480 V safeguards buses (5A, 2A/3A,6A)</p> <p>AND EITHER:</p> <p>Restoration of at least one safeguards bus within 4 hours is not likely</p> <p>OR</p> <p>Actual or imminent conditions requiring entry into ORANGE or RED path on F-0.2, "CORE COOLING"</p>	1	2	3	4				<p>SS 1.1</p> <table border="1" data-bbox="703 578 1045 623"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td></td><td></td><td></td> </tr> </table> <p>Loss of all offsite and all onsite AC power (Table S-1) to 480 V safeguards buses (5A, 2A/3A, 6A) for ≥ 15 minutes (Note 3)</p>	1	2	3	4				<p>SA 1.1</p> <table border="1" data-bbox="1142 578 1520 623"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td></td><td></td><td></td> </tr> </table> <p>AC power capability to 480 V safeguards buses (5A, 2A/3A, 6A) reduced to a single power source (Table S-1) for ≥ 15 minutes (Note 3) such that any additional single failure would result in loss of all AC power to safeguard buses</p>	1	2	3	4				<p>SU 1.1</p> <table border="1" data-bbox="1604 578 1927 623"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td></td><td></td><td></td> </tr> </table> <p>Loss of all offsite AC power (Table S-1) to 480 V safeguards buses (5A, 2A/3A, 6A) for ≥ 15 minutes (Note 3)</p>	1	2	3	4			
1	2	3	4																													
1	2	3	4																													
1	2	3	4																													
1	2	3	4																													



9.1 - Emergency Action Levels

CATEGORY "S" SYSTEM MALFUNCTION

Sub-Category	General	Site Area	Alert	Unusual Event																																
<p>2</p> <p>ATWS</p> <p>Criticality</p>	<p>SG 2.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p>Failure of automatic and all manual trip signals to reduce power range < 5%</p> <p>AND</p> <p>Actual or imminent conditions requiring entry into EITHER:</p> <p>RED path in F-0.2, CORE COOLING</p> <p>OR</p> <p>RED path in F-0.3, HEAT SINK</p>	1	2							<p>SS 2.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p>Failure of an automatic trip signal to reduce power range < 5%</p> <p>AND</p> <p>Manual trip actions taken at the reactor control console are not successful</p>	1	2							<p>SA 2.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p>Failure of an automatic trip signal to reduce power range < 5%</p> <p>AND</p> <p>Manual trip actions taken at the reactor control console are successful</p>	1	2							<p>SU 2.1</p> <table border="1"> <tr> <td></td> <td></td> <td>3</td> <td>4</td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p>Unplanned sustained positive startup rate observed on nuclear instrumentation</p>			3	4				
1	2																																			
1	2																																			
1	2																																			
		3	4																																	
<p>3</p> <p>Inability to Reach Shutdown Conditions</p>				<p>SU 3.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p>Plant is not brought to required operating mode within Technical Specifications LCO action statement time</p>	1	2	3	4																												
1	2	3	4																																	



9.1 - Emergency Action Levels

CATEGORY "S" SYSTEM MALFUNCTION

Sub-Category	General	Site Area	Alert	Unusual Event																												
4 Inst. / Comm.		<p>SS 4.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td></td> <td></td> <td></td> </tr> </table> <p>Loss of > approximately 75% of Control Room Overhead annunciators or Control Room indicators Table S-3 associated with safety systems</p> <p>AND</p> <p>Any significant transient is in progress, (Table S-2)</p> <p>AND</p> <p>Compensatory indications are unavailable</p>	1	2	3	4				<p>SA 4.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td></td> <td></td> <td></td> </tr> </table> <p>Unplanned loss of > approximately 75% of Control Room Overhead annunciators or Control Room indicators Table S-3 associated with safety systems for ≥ 15 minutes (Note 3)</p> <p>AND EITHER</p> <p>Any significant transient is in progress, (Table S-2)</p> <p>OR</p> <p>Compensatory indications are unavailable</p>	1	2	3	4				<p>SU 4.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td></td> <td></td> <td></td> </tr> </table> <p>Unplanned loss of > approximately 75% of Control Room annunciators or Control Room indicators Table S-3 associated with safety systems for ≥ 15 minutes (Note 3)</p> <p>SU 4.2</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td></td> <td></td> <td></td> </tr> </table> <p>Loss of all Table S-4 onsite (internal) communications capability affecting the ability to perform routine operations</p> <p>OR</p> <p>Loss of Table S-4 offsite (external) communications capability affecting the ability to perform offsite communications</p>	1	2	3	4				1	2	3	4			
1	2	3	4																													
1	2	3	4																													
1	2	3	4																													
1	2	3	4																													



9.1 - Emergency Action Levels
CATEGORY "S" SYSTEM MALFUNCTION

Sub-Category	General	Site Area	Alert	Unusual Event														
5 Fuel Clad Degradation				<p>SU 5.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td></td> <td></td> <td></td> </tr> </table> <p>[Unit 3]: 1(2) RM063A/B Gross Failed Fuel Detector High alarm (>50 $\mu\text{Ci/ml}$)</p> <p>SU 5.2</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td></td> <td></td> <td></td> </tr> </table> <p>Coolant Sample Activity: > 60 $\mu\text{Ci/gm}$ I-131 dose equivalent</p>	1	2	3	4				1	2	3	4			
1	2	3	4															
1	2	3	4															
6 RCS Leakage				<p>SU 6.1</p> <p>Unidentified or pressure boundary leakage > 10 gpm</p> <p>OR</p> <p>Identified leakage > 25 gpm</p>														



9.1 - Emergency Action Levels

CATEGORY "S" SYSTEM MALFUNCTION

Sub-Category	General	Site Area	Alert	Unusual Event							
7 Loss of DC Power		<p>SS 7.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td></td> <td></td> <td></td> </tr> </table> <p>< 105 VDC bus voltage indications on all safety-related DC buses for \geq 15 minutes (Note 3)</p>	1	2	3	4					
1	2	3	4								



9.1 - Emergency Action Levels
HOT CONDITIONS

Table S – 1 Safeguards Bus AC Power Sources

UNIT	ONSITE	OFFSITE
2	- 480 V EDG 21 - 480 V EDG 22 - 480 V EDG 23 - Appendix "R" Diesel	- Unit Auxiliary transformer* - Station Auxiliary transformer* - 13.8 KV gas turbine auto transformer*
3	- 480 V EDG 31 - 480 V EDG 32 - 480 V EDG 33 - Appendix "R" Diesel	- Unit Auxiliary transformer - Station Auxiliary transformer - 13W92 feeder - 13W93 feeder

* With 86P or 86BU tripped all offsite power supplies must be considered as one power supply.



9.1 - Emergency Action Levels HOT CONDITIONS

Table S – 2 Significant Transients

- Automatic turbine runback > 25% thermal reactor power
- Electrical load rejection > 25% full electrical load
- Reactor Trip
- Safety injection activation
- Thermal power oscillations of > 10%



9.1 - Emergency Action Levels
HOT CONDITIONS

Table S – 3 Safety System Indicators

- Reactivity Control
- RCS Inventory
- Reactor Trip
- Decay Heat Removal
- Fission Product Barriers



9.1 - Emergency Action Levels
HOT CONDITIONS

Table S – 4 Communications Systems

System	Onsite (internal)	Offsite (external)
Plant Telephone System	X	X
Plant Radio System	X	
Page / Party System	X	
Emergency Notification System		X



9.1 - Emergency Action Levels
HOT CONDITIONS

CATEGORY "F" FISSION PRODUCT BARRIERS

	General	Site Area	Alert	Unusual Event																																
1 Fission Product Barrier	<p>FG 1.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p>Loss of any two barriers</p> <p>AND</p> <p>Loss or potential loss of third barrier (Table F-1)</p>	1	2	3	4					<p>FS 1.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p>Loss or potential loss of any two barriers (Table F-1)</p>	1	2	3	4					<p>FA 1.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p>Any loss or any potential loss of either Fuel Clad or RCS (Table F-1)</p>	1	2	3	4					<p>FU 1.1</p> <table border="1"> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p>Any loss or any potential loss of Containment (Table F-1)</p>	1	2	3	4				
1	2	3	4																																	
1	2	3	4																																	
1	2	3	4																																	
1	2	3	4																																	



9.1 Emergency Action Levels

HOT CONDITIONS

TABLE "F-1" FISSION PRODUCT BARRIER MATRIX

	FUEL CLADDING BARRIER (FC)		REACTOR COLLANT SYSTEM BARRIER (RCS)		CONTAINMENT BARRIER (GNMT)	
	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS
A. CSFST	<input type="checkbox"/> 1. Core –Cooling RED entry conditions met	<input type="checkbox"/> 1. Core Cooling ORANGE entry conditions met OR Heat Sink – RED entry conditions met and heat sink is required	<input type="checkbox"/>	<input type="checkbox"/> 1. Integrity – RED entry conditions met OR Heat Sink – RED entry conditions met and heat sink is required	<input type="checkbox"/>	<input type="checkbox"/> 1. Containment – RED entry conditions met



9.1 Emergency Action Levels

HOT CONDITIONS

TABLE "F-1" FISSION PRODUCT BARRIER MATRIX

	Fuel Cladding Barrier (FC)		Reactor Coolant System (RCS)		Containment Barrier (CNMT)	
	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS
B. Core Exit TCs	<input type="checkbox"/> 2. Core exit TCs > 1,200° F	<input type="checkbox"/> 2. Core exit TCs [Unit 2] > 700° F [Unit 3] > 715° F	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> 2. Core exit TCs > 1,200° F AND Core exit TCs not lowering within 15 minutes after restoration procedure entry <input type="checkbox"/> 3. Core exit TCs [Unit 2] > 700° F [Unit 3] > 715° F AND RVLIS [Unit 2] < 41% [Unit 3] < 33% w/no RCPs AND Core exit TCs not lowering or RVLIS not rising within 15 min. after restoration procedure entry.



9.1 Emergency Action Levels

HOT CONDITIONS

TABLE "F-1" FISSION PRODUCT BARRIER MATRIX

	Fuel Cladding Barrier (FC)		Reactor Coolant System (RCS)		Containment Barrier (GNMT)	
	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS
C. Radiation	<input type="checkbox"/> 3. Containment radiation monitor R-25 or R-26 > 17 R/hr		<input type="checkbox"/> 1. [Unit 2] R-41 > 1.2E-5 μCi/cc or R-42 > 1.02 E-2 μCi/cc [Unit 3] R-11 > 1.2E-5 μCi/cc or R-12 > 5.0E-2 μCi/cc			<input type="checkbox"/> 4. Containment radiation monitor R-25 or R-26 > 68 R/hr



9.1 - Emergency Action Levels

HOT CONDITIONS

TABLE "F-1" FISSION PRODUCT BARRIER MATRIX

	Fuel Cladding Barrier (FC)		Reactor Coolant System (RCS)		Containment Barrier (CNMT)	
	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS
D. Inventory	<input type="checkbox"/>	<input type="checkbox"/> 3. RVLIS [Unit 2] < 41% [Unit 3] < 33% With no RCPs running	<input type="checkbox"/> 2. RCS leak rate resulting in a loss of RCS sub-cooling (<Table F-2) <input type="checkbox"/> 3. Ruptured SG results in an ECCS (SI) actuation	<input type="checkbox"/> 2. RCS leak rate indicated greater than 87 gpm	<input type="checkbox"/> 1. A Containment pressure rise followed by a rapid unexplained drop in Containment pressure <input type="checkbox"/> 2. Containment pressure or sump level response not consistent with LOCA conditions <input type="checkbox"/> 3. Ruptured SG faulted outside of Containment	<input type="checkbox"/> 5. Containment pressure > 47 psig and rising <input type="checkbox"/> 6. Containment hydrogen concentration \geq 4%



9.1 - Emergency Action Levels
HOT CONDITIONS

TABLE "F-1" FISSION PRODUCT BARRIER MATRIX

	Fuel Cladding Barrier (FC)		Reactor Coolant System (RCS)		Containment Barrier (CNMT)	
	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS
D. Inventory (continued)					<input type="checkbox"/> 4. Primary-to-secondary leak rate > 10 gpm AND Un-isolable steam release from affected SG to the environment	<input type="checkbox"/> 7. Containment pressure > Phase B isolation signal set-point following LOCA AND Less than Table F-3 depressurization equipment operating as designed



9.1 - Emergency Action Levels

HOT CONDITIONS

TABLE "F-1" FISSION PRODUCT BARRIER MATRIX

	Fuel Cladding Barrier (FC)		Reactor Coolant System (RCS)		Containment Barrier (CNMT)	
	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS	<input type="checkbox"/> LOSS	<input type="checkbox"/> POTENTIAL LOSS
E. Other	<input type="checkbox"/> 4. Primary coolant activity > 300 $\mu\text{Ci/gm}$ I-131 dose equivalent				<input type="checkbox"/> 5. Inability to isolate all valves in any one line AND Direct downstream pathway to the environment exists after Containment isolation signal	
F. Judgment	<input type="checkbox"/> 5. ANY condition in the opinion of the Emergency Director that indicates loss of the Fuel Clad barrier	<input type="checkbox"/> 4. ANY condition in the opinion of the Emergency Director that indicates potential loss of the Fuel Clad barrier	<input type="checkbox"/> 4. ANY condition in the opinion of the Emergency Director that indicates loss of the RCS barrier	<input type="checkbox"/> 3. ANY condition in the opinion of the Emergency Director that indicates potential loss of the RCS barrier	<input type="checkbox"/> 6. ANY condition in the opinion of the Emergency Director that indicates loss of the Containment barrier	<input type="checkbox"/> 8. ANY condition in the opinion of the Emergency Director that indicates potential loss of the Containment barrier



9.1 – Emergency Action Levels
HOT CONDITIONS
Table “F-2” RCS Sub-cooling


UNIT	RCS Pressure (PSIG)	Sub-cooling (°F)	
		Non-Adverse Containment	Adverse Containment
2	0 – 400	52	83
	401 – 800	36	49
	801 – 1200	23	30
	1201 - 2500	19	26
3	< 1000	40	112
	1000 – 1900	40	78
	> 1900	40	63



9.1 - Emergency Action Levels
HOT CONDITIONS

Table "F-3" Minimum Containment Cooling Systems

FCUs	Spray Pumps
< 3	2
3	1
5	0

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9.1 - Emergency Action Levels

NOTES HOT CONDITIONS:

- NOTE 1:** The Emergency Director should not wait until the applicable time has elapsed, but should declare the event as soon as it is determined that the condition will likely exceed the applicable time. **IF** dose assessment results are available, **THEN** declaration should be based on dose assessment instead of radiation monitor values. (See EAL AS1.2/AG1.2) Do not delay declaration awaiting dose assessment results.
- NOTE 2:** The Emergency Director should not wait until the applicable time has elapsed, but should declare the event as soon as it is determined the release duration has exceeded, or will likely exceed, the applicable time. In the absence of data to the contrary, assume that the release duration has exceeded the applicable time if an ongoing release is detected and the release start time is unknown.
- NOTE 3:** The Emergency Director should not wait until the applicable time has elapsed, but should declare the event as soon as it is determined that the condition will likely exceed the applicable time.
- NOTE 4:** The National Earthquake Information Center (NEIC) can be contacted by calling (303) 273- 8500 to confirm recent seismic activity in the vicinity of IPEC. Provide the analyst with the following IPEC coordinates: **41° 15' 55" north latitude, 73° 57' 08" west longitude.**
Alternatively go to the USGS NEIC website: <http://earthquake.usgs.gov>
- NOTE 5:** Not applicable to this chart.



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9.1 - Emergency Action Levels
CATEGORY "C" COLD SHUT DOWN/REFUEL SYSTEM MALFUNCTION

Sub-Category	General	Site Area	Alert	Unusual Event														
1 Loss of AC Power			CA 1.1 <table border="1"> <tr> <td></td><td></td><td></td><td></td><td>5</td><td>6</td><td>DEF</td> </tr> </table> Loss of all offsite and all onsite AC power (Table C-4) to 480V safeguards buses (5A, 2A/3A, 6A) for ≥ 15 minutes. (Note 3)					5	6	DEF	CU 1.1 <table border="1"> <tr> <td></td><td></td><td></td><td></td><td>5</td><td>6</td><td></td> </tr> </table> AC power capability to 480V safeguards buses (5A, 2A/3A, 6A) reduced to a single power source (Table C-4) for ≥ 15 minutes such that any additional single failure would result in loss of all AC power to safeguard buses (Note 3)					5	6	
				5	6	DEF												
				5	6													



9.1 - Emergency Action Levels
CATEGORY "C" COLD SHUT DOWN/REFUEL SYSTEM MALFUNCTION

Sub-Category	General	Site Area	Alert	Unusual Event
2 RPV Level	<p>CG 2.1</p> <p align="center">[][][][][] 5 6 []</p> <p>Reactor vessel level < top of active fuel (57' 9.6" elev. - 56% on RVLIS) for \geq 30 minutes (Note 3) AND Any Containment Challenge indication, (Table C-5)</p> <p>CG 2.2</p> <p align="center">[][][][][] 5 6 []</p> <p>Reactor vessel level cannot be monitored for \geq 30 minutes with core uncover indicated by ANY of the following (Note 3)</p> <ul style="list-style-type: none"> - Containment High Range Radiation Monitor reading upscale - Unexplained rise in any Table C-1 sump/tank level - Erratic Source Range Monitor indication <p>AND Any Containment Challenge indication, Table C-5</p>	<p>CS 2.1</p> <p align="center">[][][][][] 5 6 []</p> <p>With Containment Closure (Note 5) not established, reactor vessel level < 6" below the bottom of the RCS hot leg (59' 10.8" elev. - RVLIS 60.8%)</p> <p>CS 2.2</p> <p align="center">[][][][][] 5 6 []</p> <p>With Containment Closure (Note 5) established, reactor vessel level < top of active fuel (57' 9.6" elev. 56 % on RVLIS)</p> <p>CS 2.3</p> <p align="center">[][][][][] 5 6 []</p> <p>Reactor vessel level cannot be monitored for \geq 30 minutes (Note 3) with a loss of inventory as indicated by any of the following:</p> <ul style="list-style-type: none"> - Containment High Range Radiation Monitor reading upscale - Unexplained rise in any Table C1 sump/tank level - Erratic Source Range Monitor indication 	<p>CA 2.1</p> <p align="center">[][][][][] 5 6 []</p> <p>Reactor vessel level < bottom of the RCS hot leg (60' 4.8" elev. - RVLIS 62%) OR Reactor vessel level cannot be monitored for \geq 15 minutes (Note 3) with unexplained rise in any Table C-1 sump/tank level</p>	<p>CU 2.1</p> <p align="center">[][][][][] 5 [][][]</p> <p>Inability to restore or maintain pressurizer level > 18% or RCS target level band due to RCS leakage for \geq 15 minutes (Note 3)</p> <p>CU 2.2</p> <p align="center">[][][][][] 6 [][][]</p> <p>Unplanned reactor vessel level drop below vessel flange (69' elev. - RVLIS 83%) (or RCS target level band if the RCS level was procedurally being controlled below the vessel flange) for \geq 15 minutes (Note 3)</p> <p>CU 2.3</p> <p align="center">[][][][][] 6 [][][]</p> <p>Reactor vessel level cannot be monitored with unexplained rise in any Table C-1 sump/tank level</p>



9.1 - Emergency Action Levels
CATEGORY "C" COLD SHUT DOWN/REFUEL SYSTEM MALFUNCTION

Sub-Category	General	Site Area	Alert	Unusual Event
5 Inadvertent Criticality				<p>CU 5.1</p> <p>Unplanned sustained positive startup rate observed on nuclear instrumentation</p>
6 Loss of DC Power				<p>CU 6.1</p> <p>< 105 VDC bus voltage indications on all Technical Specification required 125 VDC buses for \geq 15 minutes (Note 3)</p>



9.1 - Emergency Action Levels
COLD CONDITIONS

Table C-1 Sumps/Tanks

- Containment sumps
- CCW surge tank
- PRT
- RCDT



9.1 - Emergency Action Levels
COLD CONDITIONS

Table C-2 Communications Systems

System	Onsite (Internal)	Offsite (External)
Plant Telephone System	X	
Plant Radio System	X	
Page/Party System	X	
Emergency Notification System		X



9.1 - Emergency Action Levels
COLD CONDITIONS

Table C-3 RCS Reheat Duration Thresholds

RCS	Containment Closure	Duration
Intact and not Reduced Inventory	N/A	60 Minutes*
Not intact OR Reduced Inventory	Established	20 Minutes*
	Not Established	0 Minutes

* If an RCS heat removal system is in operation within this time frame and RCS temperature is being reduced, the EAL is **not** applicable



9.1 - Emergency Action Levels
COLD CONDITIONS

Table C-4 Safeguards Bus AC Power Sources

UNIT	Onsite	Offsite
2	<ul style="list-style-type: none"> • 480 V EDG 21 • 480 V EDG 22 • 480 V EDG 23 • Appendix "R" Diesel 	<ul style="list-style-type: none"> • Unit Auxiliary Transformer* • Station Auxiliary Transformer* • 13.8 KV Gas Turbine Auto Transformer*
3	<ul style="list-style-type: none"> • 480 V EDG 31 • 480 V EDG 32 • 480 V EDG 33 • Appendix "R" Diesel 	<ul style="list-style-type: none"> • Unit Auxiliary Transformer • Station Auxiliary Transformer • 13W92 Feeder • 13W93 Feeder


* With 86P or 86BU tripped, all offsite power supplies must be considered as one power supply.



9.1 - Emergency Action Levels
COLD CONDITIONS

Table C-5 Containment Challenge Indications

- Containment Closure (Note 4) not established
- Containment hydrogen concentration $\geq 4\%$
- Unplanned rise in containment pressure

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9.1 - Emergency Action Levels

NOTES COLD CONDITIONS:

- Note 1:** The Emergency Director should not wait until the applicable time has elapsed, but should declare the event as soon as it is determined that the condition will likely exceed the applicable time. **IF** dose assessment results are available, **THEN** declaration should be based on dose assessment instead of radiation monitor values. (See EAL AS1.2/AG1.2) Do not delay declaration awaiting dose assessment results.
- Note 2:** The Emergency Director should not wait until the applicable time has elapsed, but should declare the event as soon as it is determined that the release duration has exceeded, or will likely exceed, the applicable time, in the absence of data to the contrary, assume that the release duration has exceeded the applicable time if an ongoing release is detected and the release start time is unknown.
- Note 3:** The Emergency Director should not wait until the applicable time has elapsed, but should declare the event as soon as it is determined that the condition will likely exceed the applicable time.
- Note 4:** The National Earthquake Information Center (NEIC) can be contacted by calling (303) 273-8500 to confirm recent seismic activity in the vicinity of IPEC. Provide the analyst with the following IPEC coordinates: 41° 15' 55" north latitude, 73° 57' 08" west longitude. Alternatively go to the USGS NEIC website: <http://earthquake.usgs.gov>
- Note 5:** The site specific procedurally defined actions taken to secure containment and its associated structures, systems, and components as a functional barrier to fission product release under existing plant conditions. As applied to IPEC, Containment Closure exists when the requirements of Section 3.9.3 of Technical Specifications are met (all un-isolated flow paths are promptly closes and at least one door in each air lock is closed following an evacuation of containment).

10CFR50.54(Q)(2) Review

Procedure/Document Number: IP-EP-210	Revision: 27
Equipment/Facility/Other: Indian Point Energy Center	
Title: Central Control Room	

Part I. Description of Activity Being Reviewed (event or action, or series of actions that have the potential to affect the emergency plan or have the potential to affect the implementation of the emergency plan):

Procedure was revised, to reflect the requirement in the Post Unit 2 Shutdown Eplan (PSEP), as submitted to the NRC per LAR, license #NL-19-001. See attached matrix for changes made. Procedure will be effective on June 1, 2020,

Part II. Emergency Plan Sections Reviewed (List all emergency plan sections that were reviewed for this activity by number and title. IF THE ACTIVITY IN ITS ENTIRETY IS AN EMERGENCY PLAN CHANGE, EAL CHANGE OR EAL BASIS CHANGE, ENTER THE SCREENING PROCESS. NO 10CFR50.54(q)(2) DOCUMENTATION IS REQUIRED.

Part 1 Introduction:

Section A: Purpose

Part 2 Planning Standards and Criteria:

Section A: Assignment of Responsibility

Section B: Station Emergency Response Organization

Section E: Notification Methods and Procedures

Section H: Emergency Facilities and Equipment

Part III. Ability to Maintain the Emergency Plan (Answer the following questions related to impact on the ability to maintain the emergency plan):

- Do any elements of the activity change information contained in the emergency plan (Section 3.0 Step 6)?
YES NO IF YES, enter screening process for that element
- Do any elements of the activity change an emergency classification Initiating Condition, Emergency Action Level (EAL), associated EAL note or associated EAL basis information or their underlying calculations or assumptions?
YES NO IF YES, enter screening process for that element
- Do any elements of the activity change the process or capability for alerting and notifying the public as described in the FEMA-approved Alert and Notification System design report?
YES NO IF YES, enter screening process for that element
- Do any elements of the activity change the Evacuation Time Estimate results or documentation?
YES NO IF YES, enter screening process for that element
- Do any elements of the activity change the Onshift Staffing Analysis results or documentation?
YES NO IF YES, enter screening process for that element

10CFR50.54(Q)(2) Review

Procedure/Document Number: IP-EP-210	Revision: 27
Equipment/Facility/Other: Indian Point Energy Center	
Title: Central Control Room	

Part IV. Maintaining the Emergency Plan Conclusion The questions in Part III do not represent the sum total of all conditions that may cause a change to or impact the ability to maintain the emergency plan. Originator and reviewer signatures in Part V document that a review of all elements of the proposed change have been considered for their impact on the ability to maintain the emergency plan and their potential to change the emergency plan.

1. Provide a brief conclusion that describes how the conditions as described in the emergency plan are maintained with this activity.
 2. Check the box below when the 10CFR50.54(q)(2) review completes all actions for all elements of the activity – no 10CFR50.54(q)(3) screening or evaluation is required for any element. Otherwise, leave the checkbox blank.
- I have completed a review of this activity in accordance with 10CFR50.54(q)(2) and determined that the effectiveness of the emergency plan is maintained. This activity does not make any changes to the emergency plan. No further actions are required to screen or evaluate this activity under 10CFR50.54(q)(3).

Per Post Shutdown Emergency Plan (PSEP), Unit 3 CCR will be the active/running plant and Unit 2 will be at shut down. Unit 3 CCR will be the lead plant for making initial declarations that affect both Units. The changes made to this procedure (see attached matrix) reflects this requirement of the Post Unit 2 Shutdown Eplan, as submitted to the NRC (license # NL-19-001), some minor editorial adjustments, updated the process for log-keeping and revised procedure to reflect the new paging system which was previously approved by a separate Q. The NRC has approved the PSEP per RA-20-040.

A review of this activity in accordance with 10 CFR 50.54(q)(2) has been completed and determined that the effectiveness of the PSEP is maintained. This revision aligns the procedure with the protocols of the post Unit 2 shutdown. None of the changes affect the ability to perform classifications, notifications, or PARs, it does not affect activation or staffing of the ERO, and all planning standard requirements are maintained. The changes made do not require a change to the Emergency Action Level scheme, On-shift Staffing study or the PSEP.

No further actions are required to screen or evaluate this activity under 10 CFR 50.54(q)(3).

Part V. Signatures:

Preparer Name (Print) Rebecca A. Martin	Preparer Signature <i>Rebecca A. Martin</i>	Date: 5/14/2020
(Optional) Reviewer Name (Print)	Reviewer Signature	Date:
Reviewer Name (Print) Timothy Garvey Nuclear EP Project Manager	Reviewer Signature <i>Rebecca A. Martin for T. Garvey</i> Approval Per Telecom	Date: 5/14/2020
Approver Name (Print) Frank Mitchell Emergency Planning Manager or designee	Approver Signature <i>Frank Mitchell</i>	Date: 5/15/2020

IP-EP-210 Revision 27 REVISION MATRIX

Change No.	Page/Section	Previous Version	New Version	Editorial Change	Effect on 10 CFR 50.47(b) Planning Standards or NUREG-0654 program elements? Justify if NO.
1.	Page 3 Section 4.4 Page 21 NOTE	The Shift Managers SHALL confer with each other for any event or condition which may affect both Units such as security, or natural events. IF it is agreed that both Units are affected, THEN the Unit 2 Shift Manager SHALL classify and declare the emergency and assume the role of site Emergency Director in accordance with this procedure, IP-EP-210, Central Control Room.	4.4 The Unit 3 Shift Manager will confer with the Unit 2 Shift Manager (if they are available) about any event or condition which may affect both Units such as security, or natural events. IF the event is warranted, THEN , the Unit 3 Shift Manager SHALL declare the emergency and assume the role of site Emergency Director in accordance with procedure, IP-EP-210, Central Control Room.	N	N – Per Decommissioning Emergency Plan, Unit 3 CCR will be the active/running plant and Unit 2 will be at shut down. Unit 3 CCR will be lead plant for making initial declarations that affect both Units. This change reflects that requirement in the Post Unit 2 shut down Eplan, which is under an LAR. (license # NL-19-001) NRC approved per RA-20-040.
2.	Page 4 Section 4.7	4.7 The Shift Manager SHALL request the opposite unit to activate mobilization of the IPEC Emergency Response Organization (ERO) and activation of the emergency response facilities (TSC, OSC, EOF and JIC) upon declaration of an Alert or higher classification.	4.7 The Shift Manager SHALL request the opposite unit (if they are available) to activate mobilization of the IPEC Emergency Response Organization (ERO) and activation of the emergency response facilities (TSC, OSC, EOF and JIC) upon declaration of an Alert or higher classification.	N	N – Added “if they are available” to sentence, since Unit 2 may not be able to support activation of ERO with Unit being shutdown and limited staffing available. Per Decommissioning Emergency Plan, Unit 3 CCR SM will activate the ERO. This change reflects that requirement in the Post Unit 2 shut down Eplan, which is under an LAR. (license # NL-19-001) NRC approved per RA-20-040.

IP-EP-210 Revision 27 REVISION MATRIX

3.	Page 4, Section 4.8	4.8 For events classified as Unusual Events, the Shift Manager, acting as Emergency Director has the ability to activate, or request the opposite unit to active, ERO callout for support as needed.	4.8 For events classified as Unusual Events, the Shift Manager, acting as Emergency Director has the ability to activate, or request the opposite unit to active, ERO callout for support as needed, if they are available.	N	N – Added “if they are available” to sentence, since Unit 2 may not be able to support activation of ERO with Unit being shutdown and limited staffing available. Per Decommissioning Emergency Plan, Unit 3 CCR SM has responsibilities to activate the ERO. This change reflects that requirement in the Post Unit 2 shut down Eplan, which is under an LAR. (license # NL-19-001) NRC approved per RA-20-040.
4.	Page 7, Attachment 9.1 sheet 1 of 14 NOTE Page 21 NOTE	<ul style="list-style-type: none"> The expectation for all ERO positions is to use WebEOC for log-keeping purposes. Reference to traditional paper forms remains in this checklist for the situation in which WebEOC is unavailable, such as a power or computer failure. 	NONE	N	N – WebEOC is not utilized by the SM. Any log keeping is completed by the Facility Communicator. Log keeping/timeline will be kept by the CCR SM in eSOMS. Intent for log keeping has not changed.
5.	Page 7, Attachment 9.1 sheet 1 of 14 NOTE	<ul style="list-style-type: none"> The Unit 2 & Unit 3 Shift Managers SHALL confer with each other for any event or condition which may affect both Units such as security or natural events. IF it is agreed, both units are affected, THEN the Unit 2 Shift Manager SHALL classify and declare the emergency and assume the role of Site Emergency Director in accordance with this procedure IP-EP-210, Central Control Room. 	<ul style="list-style-type: none"> The Unit 2 & Unit 3 Shift Managers SHALL confer with each other for any event or condition which may affect both Units such as security or natural events. IF it is agreed, both units are affected, THEN the Unit 3 Shift Manager SHALL classify and declare the emergency and assume the role of Site Emergency Director in accordance with this procedure IP-EP-210, Central Control Room. 	N	N - Per Decommissioning Emergency Plan, Unit 3 CCR will be the active/running plant and Unit 2 will be at shut down. Unit 3 CCR will be lead plant for making initial declarations that affect both Units. This change reflects that requirement in the Post Unit 2 shut down Eplan, which is under an LAR. (license # NL-19-001) NRC approved per RA-20-040.

IP-EP-210 Revision 27 REVISION MATRIX

6.	Page 9, Attachment 9.1 sheet 3 of 14 1.0 C	Attachment 9.1	None	Y	N - Removed "Attachment 9.1". This is a typo, having this attachment number listed in the step does not direct to anything. Removed an error trap.
7.	Page 22 Section	1.0 <u>Initial Responsibility/Activity</u>	<u>Initial Responsibility/Activity</u>	Y	N – fix formatting issue
8.	Page 22 Section 1.2	1.1	1.2	Y	N – fix formatting issue
9.	Page 22 Section 1.2 B4 Page 23 Section C6	IF requested by other Unit's SM/ED, THEN verify ERDS is transmitting OR activate ERDS per Section 1.3 of Attachment 9.1 within 1 hour of declaration.	IF requested by other Unit's SM/ED, THEN verify ERDS is transmitting OR activate ERDS per Section 1.2 of Attachment 9.1 within 1 hour of declaration.	Y	N – Fixed typo on section number.
10.	Page 25 Section 2.2	Provide updates to personnel with information provided by the Emergency Director When information is provided to you, use the public address system to disseminate that information to the personnel on Site.	None	N	N – removed this section since Singlewire is being used by both CCRs during an emergency and they do not have to make individual plant pages during an emergency. The intent to make plant pages has not changed. Addition of Singlewire was previously evaluated under a separate Q.

Attachment 9.1

Emergency Planning Document Change Checklist Form

(All sections must be completed, N/A or place a check on the line where applicable)

Section 1

Doc/Procedure Type:	Administrative <input type="checkbox"/> Implementing <input checked="" type="checkbox"/> EPLAN <input type="checkbox"/> N/A <input type="checkbox"/>
Doc/Procedure No:	IP-EP-210
Doc/Procedure Title:	Central Control Room
New revision number:	27
Corrective Action:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> CR#: OL-OLI-2018-00090 CA 18
Effective date:	June 1, 2020

Section 2

Change Description

1. Ensure the following are completed, or are not applicable and are so marked:

- a. 50.54g N/A
 - b. EN-FAP-OM-023 N/A
 - c. IP-SMM-AD-102 N/A
 - d. OSRC N/A
 - e. NRC Transmittal N/A
- (within 30 days)

2. List any other documents affected by this change: N/A

3. Transmittals are completed: N/A Date: 5/19/2020

4. Ensure the proper revision is active in eB Ref. Lib.: N/A

5. Approved doc/procedure delivered to Doc. Control for distribution: N/A Date: 5/20/2020

6. Position Binders updated: N/A Date: 6/1/2020

7. Copy of EPDCC placed in EP file: N/A Date: _____

8. Supporting documentation is submitted as a general record in eB Ref. Lib.: N/A Date: 6/1/2020

9. Word files are moved from working drafts folder to current revision folder in the EP drive:
 N/A Date: 6/1/2020

IPEC IMPLEMENTING PROCEDURE PREPARATION, REVIEW, AND APPROVAL

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ATTACHMENT 10.2

IPEC PROCEDURE REVIEW AND APPROVAL

(Page 1 of 1)

Procedure Title: Central Control Room

Procedure No: IP-EP-210 Existing Rev: 26 New Rev: 27 DRN/EC No: DRN-20-00305

Procedure Activity (MARK Applicable)	Converted To IPEC, Replaces:	Temporary Procedure Change (MARK Applicable)
<input type="checkbox"/> NEW PROCEDURE <input type="checkbox"/> GENERAL REVISION <input checked="" type="checkbox"/> PARTIAL REVISION <input type="checkbox"/> EDITORIAL REVISION <input type="checkbox"/> VOID PROCEDURE <input type="checkbox"/> SUPERSEDED	<input type="checkbox"/> Converted To IPEC, Replaces: Unit 1 Procedure No: _____ Unit 2 Procedure No: _____ Unit 3 Procedure No: _____	<input type="checkbox"/> EDITORIAL Temporary Procedure Change <input type="checkbox"/> ADVANCE Temporary Procedure Change <input type="checkbox"/> CONDITIONAL Temporary Procedure Change Terminating Condition: _____
<input type="checkbox"/> RAPID REVISION	Document in Microsoft Word: <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> VOID DRN/TPC No(s): _____

Revision Summary N/A - See Revision Summary Matrix _____


Implementation Requirements

Implementation Plan? Yes No Formal Training? Yes No Special Handling? Yes No
 RPO Dept: Emergency Planning Writer (Print Name/ Ext/ Sign): Rebecca A. Martin/x7106/ Rebecca A Martin

Review and Approval (Per Attachment 10.1, IPEC Review And Approval Requirements)

1. Technical Reviewer: Kevin Robinson / [Signature] 5-14-2020
 (Print Name/ Signature/ Date)
2. Cross-Disciplinary Reviewers:
 Dept: _____ Reviewer: _____
 (Print Name/ Signature/ Date)
 Dept: _____ Reviewer: _____
 (Print Name/ Signature/ Date)
3. RPO- Responsibilities/Checklist: F. Mitchell [Signature] 5/15/2020
 (Print Name/ Signature/ Date)
 PAD required and is complete (PAD Approver and Reviewer qualifications have been verified)
 Previous exclusion from further LI-100 Review is still valid
 PAD not required due to type of change as defined in 4.6
4. Non-Intent Determination Complete: _____
 (Print Name/ Signature/ Date)

NO change of purpose or scope NO reduction in the level of nuclear safety NO voiding or canceling of a procedure, unless requirements are incorporated into another procedure or the need for the procedure was eliminated via an alternate process.	NO change to less restrictive acceptance criteria NO change to steps previously identified as commitment steps NO deviation from the Quality Assurance Program Manual NO change that may result in deviations from Technical Specifications, FSAR, plant design requirements or previously made commitments.
--	---
5. On-Shift Shift Manager/CRS: _____
 (Print Name/ Signature/ Date)
6. User Validation: User: _____
7. Special Handling Requirements Understood: _____

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CONTROLLED

Central Control Room

Prepared by:

Rebecca A. Martin
Print Name

Rebecca A. Martin
Signature

5/12/2020
Date

Approval:

Frank J. Mitchell
Print Name

Frank J. Mitchell
Signature

5/15/2020
Date

Effective Date: June 1, 2020

This procedure excluded from further LI-100 reviews.



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CENTRAL CONTROL ROOM

1.0 PURPOSE

- 1.1 To describe emergency response activities and operations of the Central Control Room (CCR)
- 1.2 To provide guidance for the response to emergencies declared at Unit 2 and Unit 3

2.0 REFERENCES

- 2.1 Indian Point Energy Center Emergency Plan
- 2.2 IP-EP-430, Site Assembly, Accountability and Relocation of Personnel Offsite
- 2.3 EN-EP-610, Recovery from a Declared Emergency
- 2.4 IP-EP-340, Meteorological Information and Dose Assessment System (MIDAS)

3.0 DEFINITIONS

None

4.0 RESPONSIBILITIES

- 4.1 The Emergency Director has the sole authority and responsibility for the classification and declaration of any emergency, approving offsite notifications and the making of protective action recommendations for the general public. These responsibilities may not be delegated. The Shift Manager in the role of Emergency Director makes the initial emergency classification; however, the SM shall verify an independent review of the EAL selected.
- 4.2 Following initial declaration of an emergency, the Shift Manager (SM) shall designate a Control Room Communicator. An on-shift Nuclear Plant Operator (NPO) normally performs this function for both Units. Any other Operations staff member may be assigned to perform this function as a backup.
- 4.3 The Shift Manager **SHALL**, upon assuming the role of Emergency Director, continue to perform the duties of Emergency Director until properly relieved by either the on-call Emergency Director in the (A)EOF or by another qualified Emergency Director such as the Plant Operations Manager (POM).
- 4.4 The Unit 3 Shift Manager will confer with the Unit 2 Shift Manager (if they are available) about any event or condition which may affect both Units such as security, or natural events. IF the event is warranted, THEN, the Unit 3 Shift Manager **SHALL** declare the emergency and assume the role of site Emergency Director in accordance with procedure, IP-EP-210, Central Control Room.
- 4.5 The Shift Manager **SHALL** ensure, the notifications of offsite authorities are initiated within 15 minutes of declaration of any emergency classification, classification upgrade or protective action recommendation being formulated.
- 4.6 The Shift Manager **SHALL** ensure independent verification of the information on the Part I and Part II forms prior to being issued to the Offsite Agencies.



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- 4.7 The Shift Manager SHALL request the opposite unit (if they are available) to activate mobilization of the IPEC Emergency Response Organization (ERO) and activation of the emergency response facilities (TSC, OSC, EOF and JIC) upon declaration of an Alert or higher classification.
- 4.8 For events classified as Unusual Events, the Shift Manager, acting as Emergency Director has the ability to activate, or request the opposite unit to active, ERO callout for support as needed, if they are available.
- 4.9 The Shift Manager is responsible for the performance of Dose Assessment calculations until such time as the (A)EOF is activated.
- 4.10 The Shift Manager/Plant Operations Manager (POM) **SHALL** establish and maintain accountability of all Operating Shift staff under the Shift Manager's control upon declaration of a Site Area Emergency or higher classification.
- 4.11 Until such time as the (A)EOF is activated, the Shift Manager/Plant Operations Manager **SHALL** assess the offsite consequences of any radiological release and, if appropriate, formulates offsite protective action recommendations. In all cases should a General Emergency be declared, protective action recommendations **SHALL** be formulated, approved and communicated to offsite authorities in accordance with implementing procedures.
- 4.12 For events classified as Unusual Events, the Shift Manager, acting as Emergency Director **SHALL** terminate the emergency and enter into recovery in accordance with implementing procedures. For all emergencies classified at the Alert level or higher, emergency termination and entry into the recovery phase **SHALL** be at the discretion of the On-Call Emergency Director in the (A)EOF.
- 4.13 The On-shift Radiation Protection Technician is responsible for monitoring Control Room habitability and establishment of Control Room contamination controls.
- 4.14 The Control Room Communicator **SHALL** perform duties in the Control Room (or alternate CCR if uninhabitable) under the Shift Manager's direction. These duties **SHALL** entail notifying the off-site authorities of an event at IPEC by utilizing the notification checklists (Forms EP-3N, 3A, 3S or 3G). Duties will also include use of RECS, radio, telephones and other communication equipment to provide directions and recommendations as appropriate from the Shift Manager. The CCR Communicator shall also remain ready to supply updates to the off-site authorities and support the Shift Manager (Emergency Director) with any other notifications or communications, as needed.
- 4.15 The Control Room Communicator is responsible for providing clear and concise communications between the CCR and other emergency response facilities.
- 4.16 The Control Room Support Staff person is responsible for assisting in the performance of CCR setup, second shift scheduling and faxing/record keeping.
- 4.17 The Facility Communicator is responsible to maintain communication with other facilities for the transfer of accurate and timely data and information.


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5.0 DETAILS

- 5.1 The Shift Manager (SM)/Plant Operations Manager (POM) **SHALL** follow the instructions outlined in Attachment 9.1, Shift Manager/POM (Emergency Director) Checklist.
- 5.2 For an emergency at the other Unit, the Shift Manager (SM) **SHALL** follow the instructions outlined in Attachment 9.2, Shift Manager's Response to an Emergency at the Other Unit Checklist.
- 5.3 The Control Room Communicator **SHALL** follow the instructions outlined in Attachment 9.3, Control Room Communicator Checklist.
- 5.4 The Facility Communicator **SHALL** follow the instructions outlined in Attachment 9.4, Facility Communicator Checklist.
- 5.5 The On-Shift Radiation Protection Technician **SHALL** follow the instructions outlined in Attachment 9.5, On-Shift Radiation Protection Technician Checklist.
- 5.6 The On-Shift Chemistry Technician **SHALL** follow the instructions outlined in Attachment 9.6, On-Shift Chemistry Technician Checklist.
- 5.7 The Support Staff person **SHALL** follow the instructions outlined in Attachment 9.7, Support Staff Checklist.

6.0 INTERFACES

- 6.1 IP-EP-115, Emergency Plan Forms
- 6.2 IP-EP-120, Emergency Classification
- 6.3 IP-EP-310, Dose Assessment
- 6.4 IP-EP-410, Protective Action Recommendations
- 6.5 IP-EP-430, Site Assembly, Accountability and Relocation of Personnel Offsite
- 6.6 EN-EP-610, Recovery from a Declared Emergency
- 6.7 IP-EP-340, Meteorological Information and Dose Assessment System (MIDAS)
- 6.8 0-FSG-100, BDBEE/ELAP Emergency Response
- 6.9 EN-EP-900, Emergency Preparedness Forms

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7.0 RECORDS


All Logs, Completed Forms and other records generated during an actual emergency **SHALL** be considered Quality Records and maintained for the life of the plant.

8.0 REQUIREMENTS AND COMMITMENT CROSS-REFERENCE

None

9.0 ATTACHMENTS

- 9.1 Shift Manager/POM (Emergency Director) Checklist
- 9.2 Shift Manager's Response to an Emergency at the Other Unit Checklist
- 9.3 Control Room Communicator Checklist
- 9.4 Facility Communicator Checklist
- 9.5 On-Shift Radiation Protection Technician Checklist
- 9.6 On-Shift Chemistry Technician Checklist
- 9.7 Support Staff Checklist
- 9.8 CCR Dose Assessor

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Attachment 9.1
Shift Manager/POM (Emergency Director) Checklist
Sheet 1 of 14

NOTE:

- This Attachment should not be entered by the Shift Manager if a natural or man-made catastrophic event has occurred and there is a loss of one of the Central Control Rooms. Procedure, 0-AOP-SEC-4 should be entered to support decision making by the SM.


1.0 Initial Responsibility/Activity

Notes

- A. **IF** at any time during the implementation of this procedure the SM is relieved by the POM or the ED in the (A)EOF, **THEN** turnover **SHALL** be completed in accordance with step 2.5

NOTE:

- Authority to classify and declare an emergency is reserved solely for the Emergency Director and may not be delegated; however, the SM shall and verify an independent review of the EAL selected. The SM in the role of Emergency Director makes the initial emergency classification.
- The Unit 2 & Unit 3 Shift Managers **SHALL** confer with each other for any event or condition which may affect both Units such as security or natural events. **IF** it is agreed, both units are affected, **THEN** the Unit 3 Shift Manager **SHALL** classify and declare the emergency and assume the role of Site Emergency Director in accordance with this procedure IP-EP-210, Central Control Room.

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Attachment 9.1

Shift Manager/POM (Emergency Director) Checklist
Sheet 2 of 14

1.0 Initial Responsibility/Activity (cont.)

Notes

1.1 Classification of the Emergency


NOTE:

The assessment, classification, and declaration of an emergency condition is expected to be completed within 15 min after the availability of indications (i.e. plant instrumentation, plant alarms, computer displays, or incoming verbal reports) to plant operators that an EAL has been exceeded.

- The 15 min criterion is not to be construed as a grace period to restore plant conditions to avoid declaring the event.
- The emergency declaration **SHOULD** be made promptly without waiting for the 15 min period to elapse once the EAL is recognized as being exceeded.
- For EALs that specify duration of the off normal condition, such as fire lasting 15 min, loss of power for 15 min etc.:
 - The ED **SHALL** make the declaration at the first available opportunity when the time has elapsed (NOT after an additional 15 minutes).
 - The ED **SHOULD** not wait **until** the applicable time has elapsed but should declare the event as soon as it is determined that the condition will likely exceed the applicable time.

NOTE:

VERIFY events affecting both units are classified as dual unit events ("BOTH UNITS" selected on NYS Part I form in MIDAS). The category that is automatically a dual unit event is Security. For events such as weather or loss of power, both units are affected as long as they are at the same level of classification (i.e. NUE). If one unit enters a higher classification at the initiating event (i.e. LOOP with one unit's EDGs all running and the other unit without EDGs running) or has to escalate then it becomes the only unit affected.

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Attachment 9.1
Shift Manager/POM (Emergency Director) Checklist
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1.0 Initial Responsibility/Activity (cont.)

Notes

- B. **Classify** the emergency condition in accordance with IP-EP-120 "Emergency Classification" **AND** ensure independent verification of the EAL selected.
- C. **Declare** the emergency, announce classification of the event to the Control Room **AND** document time of emergency declaration.

NOTE:


THE 15 - MINUTE CLOCK FOR COMPLETION OF NOTIFICATION TO STATE AND LOCAL AUTHORITIES STARTS AT THIS POINT.

- D. **IF** a Beyond Design Basis External Event (BDBEE) occurs, resulting in an Extended Loss of AC Power (ELAP) to either unit, **THEN** entry into 0-FSG-100, BDBEE/ELAP Emergency Response, is required.

NOTE:

- Security and Operations will take steps as directed by Safeguard Instructions to protect the safety of site employees and the integrity of plant equipment
- Site access and egress will be controlled per Security procedures

- E. **Obtain AND complete** steps in the applicable Emergency Notification Checklist:
 1. **IF Notice of Unusual Event** is declared, **THEN** use NUE checklist, Form **EP-3N**.
 2. **IF ALERT** is declared, **THEN** use ALERT checklist, Form **EP-3A**.
 3. **IF Site Area Emergency** is declared, **THEN** use SAE checklist, Form **EP-3S**.
 4. **IF General Emergency** is declared, **THEN** use GE checklist, Form **EP-3G**.

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Attachment 9.1
Shift Manager/POM (Emergency Director) Checklist
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1.0 Initial Responsibility/Activity (cont.)

Notes

- F. **IF** a General Emergency is declared,
THEN protective action recommendations must be made in
accordance with IP-EP-410, **Protective Action
Recommendations.**

NOTE:

- IP-EP-430 **Site Assembly, Accountability and Relocation of Personnel Offsite** provides guidance for the suspension of personnel assembly and accountability under certain conditions.
- Notification of State and local authorities **SHALL** be completed within 15 minutes of emergency declaration. Notification of initial and upgrade **SHALL** be made to the NRC within 1 hour of the emergency declaration.


1.1 Assess Any Radiological Release

NOTE:

A release of radioactive materials due to the classified event (per NYS Radiological Emergency Data Form, Part 1). In accordance with the Part 1 form, "release" is classified as one of the four (4) following descriptions:


- A. No Release**
- B. Release BELOW Federal Limits**
- C. Release ABOVE Federal Limits**
- D. Unmonitored Release Requiring Evaluation**

- A. **IF** any indications exist of abnormal radiological release as a result of the emergency, **THEN** assess offsite consequences in accordance with IP-EP-310, Dose Assessment.
- B. **IF** dose assessment results indicate offsite consequences in excess of the EPA Protective Action Guidelines, **THEN** evaluate the need to modify the General Emergency PARs per IP-EP-410, **Protective Action Recommendations.**

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Attachment 9.1
Shift Manager/POM (Emergency Director) Checklist
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- | | | |
|------------|---|---------------------|
| 1.0 | <u>Initial Responsibility/Activity (cont.)</u> | <u>Notes</u> |
|------------|---|---------------------|
-
- | | | |
|------------|---|--|
| 1.2 | Emergency Response Data Systems (ERDS) | |
|------------|---|--|
- A. **VERIFY** ERDS is activated. ERDS must be activated within 1 hour of ALERT declaration **OR** higher.
 - B. Click Start – ERDS Activation (ESM) – Site Activation Display.
 - C. A “**Warning**” display screen will appear. Click on Continue.
 - D. A Pass Code entry screen will appear. Click on “Enter View Only Mode”.
 - E. A “Select Reactor” message box will appear. Select the affected unit to verify and click “OK”.
 - F. **VERIFY** ERDS Status is “**Transmitting Data**”.
 - G. **IF** ERDS Status is “disconnected”, **THEN** exit ERDS Activation Display. **ACTIVATE OR** request unaffected unit to activate ERDS within 1 hour.
 - H. **IF** TSC has been activated, **THEN** TSC IT Specialist **OR** TSC Manager may be requested to activate ERDS as a backup to the CCR.
 - I. Click Start – ERDS Activation (ESM) – Site Activation Display.
 - J. A “**WARNING**” display screen will appear. Click on Continue
 - K. A Pass Code entry screen will appear. Obtain Pass Code from ERDS envelope in SM/POM position binder. Enter the appropriate pass code and press the “Submit” button. Pass Code is **NOT** case sensitive.
 - L. A “Select Reactor” message box will appear. Select the affected unit to activate.
 - M. **IF** emergency affects BOTH units, **THEN** an icon can be selected again to activate ERDS for other unit.
 - N. “Site ERDS Activation Display” will appear. Click “Connect” to activate ERDS.

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Attachment 9.1
Shift Manager/POM (Emergency Director) Checklist
Sheet 6 of 14

1.0 Initial Responsibility/Activity (cont.)

Notes

- O. **IF ERDS is NOT functional, THEN obtain additional resources from the unaffected Unit to complete Forms 31 A, B, C or 42 A, B, C.**
- These forms are EP-57, 58, 59 and EP-53, 54 and 55 respectively. Once completed, this information is to be given to the TSC to be faxed to the NRC within 60 minutes.


2.0 Interim Responsibility/Activity

NOTE:

IF while performing the Interim Responsibility/Activity steps as Emergency Director, you are relieved of Emergency Director Duties by the On-Call ED, THEN exit this section and enter the Continuous Responsibility/Activity (Shift Manager/POM) section at step 3.0.


2.1 Re-Classify the Emergency if Necessary

- A. **IF plant conditions change OR other events occur which may warrant upgrade of the emergency classification, THEN re-classify the emergency condition in accordance with IP-EP-120, **Emergency Classification**.**
- B. Declare the emergency and announce the upgrade classification to Control Room personnel.
- C. **IF ALERT is declared, use ALERT checklist, Form EP-3A.**
- D. **IF Site Area Emergency is declared, use SAE checklist, Form EP-3S.**
- E. **IF General Emergency is declared, THEN use GE checklist, Form EP-3G.**
- F. **IF a General Emergency is declared, THEN protective action recommendations must be made in accordance with IP-EP-410, **Protective Action Recommendations**.**

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Attachment 9.1
Shift Manager/POM (Emergency Director) Checklist
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- | | |
|---|---------------------|
| 2.0 <u>Interim Responsibility/Activity (cont.)</u> | <u>Notes</u> |
|---|---------------------|
- 2.2 Establish Radiological Controls and Maintain Onsite Personnel Safety**
- A. Keep Security informed of emergency classification, plant status and any radioactive release which may affect Security Personnel.
 - B. Once established, maintain personnel accountability.
 - C. **IF** the potential for abnormal radiological conditions in-plant or onsite exists, **THEN**:
 - 1) Direct the On-Shift Radiation Protection Technician to establish radiological controls for the Control Room and initiate habitability monitoring for the Control Room. Verify radiological controls have been established as necessary.
 - 2) Evaluate the need to relocate personnel offsite per IP-EP-430, **Site Assembly, Accountability and Relocation of Personnel Offsite**.
 - 3) Authorize emergency exposure, if necessary, using Emergency Exposures Authorization Form (Form EP-4-ALL).
 - 4) **IF** Emergency Response Facilities are not operational, authorize issuance of Potassium Iodide (KI) to onsite personnel for any projected or actual Thyroid Exposure > 5 Rem CDE **OR** following declaration of a General Emergency IAW IP-EP-420, Use of Potassium Iodide by Indian Point Personnel During an Emergency.
 - 5) **IF** issuance of Potassium Iodine (KI) is authorized by the EPM, **THEN** advise the On-Shift Radiological Protection Technician to conduct applicable radiological and/or KI briefings **AND** to distribute KI.
 - 6) **IF** authorization of issuance of Potassium Iodide (KI) is required **AND** On-Shift Radiological Protection Technician is not available (such as during a Hostile Action Based Event), **THEN** Shift Manager/POM **SHALL** conduct applicable radiological and/or KI briefings **AND** request the opposite unit Shift Manager/POM to conduct applicable radiological and/or KI briefings.
 - a. Utilize Form EP-8-All to document date, time and name of personnel ingesting KI.

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Attachment 9.1
Shift Manager/POM (Emergency Director) Checklist
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2.0 Interim Responsibility/Activity (cont.)

Notes

2.3 Perform Periodic Update Notifications


- A. Periodic update notifications to offsite authorities should be made approximately every 30 minutes or more frequently when plant conditions change. Time interval may be lengthened with concurrence of offsite agencies. For each update notification, complete (or have completed) and sign a "NYS Radiological Emergency Data Form, Part I" (Form EP-1).
- B. FAX, then Email completed Part I Form to Offsite Authorities.
- C. **IF** there has been a radiological release to the environment, **THEN** complete (or have completed) and sign a "NYS Radiological Data Form Part II (Form EP-2). Ensure independent verification of information prior to sending to Offsite Agencies.

NOTE:

NOTE:

A release of radioactive materials due to the classified event (per NYS Radiological Emergency Data Form, Part 1). In accordance with the Part 1 form, "release" is classified as one of the four (4) following descriptions:

- A. No Release**
- B. Release BELOW Federal Limits**
- C. Release ABOVE Federal Limits**
- D. Unmonitored Release Requiring Evaluation**

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Attachment 9.1


Shift Manager/POM (Emergency Director) Checklist

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- D. For periodic update notifications during Unusual Event, direct the CCR Communicator to confirm receipt of update notifications using "Control Room NUE Notification Checklist" (Form EP-3N).
- E. For periodic update notifications during an Alert or higher classification, direct the CCR Communicator to confirm receipt of update notifications using "Control Room Alert/SAE/GE Notification Checklist (Form EP-3A, 3S or 3G as applicable).

2.4 Terminate the Emergency (Unusual Event ONLY)

- A. When conditions warrant termination of the Unusual Event, enter IP-EP-610, **Recovery from a Declared Emergency** and terminate the emergency per section 5.2 "Transition to Recovery.
- B. Exit this section after termination of the emergency and enter the Closeout Responsibility/Activity section at step 4.0.

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Attachment 9.1
Shift Manager/POM (Emergency Director) Checklist
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2.0 Interim Responsibility/Activity (cont.)

Notes

2.5 Turnover Emergency Director Responsibilities


NOTE:

For Unusual Events, the Shift Manager will normally maintain the Emergency Director responsibilities until the classification is terminated per IP-EP-610, **Emergency Termination & Recovery**. For Alert and higher classifications, the Plant Operations Manager (POM) will relieve the Shift Manager of Emergency Director Duties in the Control Room. The On-Call Emergency Director in the (A)EOF at his discretion may assume Emergency Director Duties directly from the Shift Manager via telephone turnover.

- A. Provide a status briefing to the POM upon his arrival in the Control Room. The POM will request status on all of the information specified on an Essential Information Checklist. (Form EP-2-ALL).
- B. Provide copies of all completed NYS Radiological Emergency Data forms to the POM.
- C. Resume duties as Shift Manager and proceed to step 3.0 in the Continuous Responsibility/Activity (Shift Manager/POM) section.

2.6 Turnover Emergency Director Responsibility's

- A. **IF** the POM is relieving the SM of ED responsibilities, **THEN** the POM **SHALL** continue those responsibilities where the SM left off, **AND** the SM shall resume Shift Manager Responsibilities.
- B. **IF** the ED in (A)EOF is relieving the POM of ED responsibilities, **THEN** after turnover, the POM **SHALL** proceed to or continue in Section 3.0 of this procedure.
- C. **IF** the ED in (A)EOF is relieving the SM of ED responsibilities, **THEN** after turnover, the SM **SHALL** proceed to or continue in Section 3.0 of this procedure.
- D. After turnover to the EOF, the SM **SHALL** resume Shift Manager Responsibilities and the POM **SHALL** proceed to or continue in Section 3.0 of this procedure.
- E. Due to unforeseen circumstances (illness, etc.) it may become necessary to transfer ED responsibilities back to the POM or SM.

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Shift Manager/POM (Emergency Director) Checklist
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3.0 Continuous Responsibility/Activity

Notes

3.1 Emergency Classification Upgrade or Radiological Release


A. **IF** at any time an Upgrade from the previously announced Emergency Classification is declared or if a Radiological release has occurred, **THEN**:

- 1) Announce the information to the Control Room.

NOTE:

No plant pages are to be made during a security condition when security procedures are in effect until determined safe to do so.

- 2) Direct Control Room personnel to sound the site assembly alarm and make appropriate Plant Pages per Form EP-3A, 3S or 3G if required, for the new Emergency Classification **OR** if a radiological release has occurred, without an Emergency Classification upgrade, then make appropriate Plant Pages without sounding the site assembly alarm.
- 3) Contact or direct Control Room personnel to contact, the unaffected Unit's Control Room to inform them of the upgrade in Emergency Classification or Radiological Release and the need to refer to IP-EP-210, Attachment 9.2, "Shift Manager Response to an Emergency at the Other Unit Checklist".

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Shift Manager/POM (Emergency Director) Checklist
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Continuous Responsibility/Activity

Notes

3.2 Provide Backup Plant Data to the TSC

- A. **IF** the MRP-DAS is out-of-service **THEN** request the TSC to send an individual to the CCR to record plant data on Forms EP-57, 58 and 59 for Unit 3 and Forms EP-53, 54, and 55 for Unit 2 as needed, and to fax the forms to the TSC on a periodic basis or as plant status and conditions change.

3.3 Direct Entry Into Severe Accident Management


- A. **IF** plant conditions warrant the transition to Severe Accident Management Guidelines (SAMG), **THEN** inform Emergency Plant Manager to have the SAMG Evaluator ready to take over Severe Accident Management.

3.4 Evaluate Emergency Action Levels

- A. Continue to evaluate current plant condition and events relative to the emergency action levels as specified in IP-EP-120, **Emergency Classification.**
- B. Make recommendations to the Emergency Director for upgrading of the emergency classification as appropriate.

3.5 Maintain Communications with the Emergency Director

- A. Keep the Emergency Director informed of current plant status and planned operations.
- B. Discuss tasks and procedures the Control Room is currently performing and review priorities on a regular basis.
- C. **IMMEDIATELY** inform the Emergency Director of any plant condition or event that has the potential to change the emergency classification or affect radiological release status.

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Shift Manager/POM (Emergency Director) Checklist
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Continuous Responsibility/Activity

Notes

**3.6 Coordinate In-Plant team activities with Operations Support
Position/OSC Manager**


NOTE:

Once the OSC is activated, the dispatch of personnel (with the exception of NPOs into the field for emergency operations) is controlled from the OSC.

At an NUE OR an Alert, NPOs will report to and be dispatched from the Control Room.

At an SAE OR GE, NPOs **SHALL** be dispatched out of the OSC. Communications and directions can be provided to the teams from the Control Room; however, the OSC must retain team control for personnel safety and continuous accountability.

- A. Once the OSC is activated, coordinate the dispatch and control of NPOs assigned to perform in plant operations with the Operations Support Position located in the OSC. The telephone number is located in Emergency Telephone Directory (ETD). Utilize the Facility Communicator to coordinate this activity (Use Form EP-56).
 - 1) CCR should request two NPO teams, one for nuclear side tasking and one for conventional side tasking. Ensure the OSC OPS Support is updated as to their tasking and status.
- B. For operations teams already dispatched and in the field prior to the OSC being activated, coordinate the transfer of team control to the OSC with the Operations Support Position.
- C. Direct requests for in-plant operational support **IMMEDIATELY** to the Operations Support Position in the OSC to facilitate prompt response to Control Room needs.
- D. Re-enforce Control Room priorities and needs with the OSC Manager if in-plant team support is not being provided in a timely and effective manner.

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Shift Manager/POM (Emergency Director) Checklist
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Continuous Responsibility/Activity

Notes

3.7 Request Technical Support as Needed to Mitigate the Emergency.


- A. Request the TSC Manager to provide forward-looking technical support as needed to assist the Control Room staff in responding to the emergency.
- B. Provide the TSC Manager with periodic briefs on current mitigation strategies and emergency procedures currently being implemented.
- C. **IF** EOF is operational **AND** turnover with the Emergency Director at the EOF is completed, release unaffected unit's on shift Chemistry Technician/CCR Dose Assessor to return to the unaffected unit CCR.

3.8 Exit to Recovery Phase

Upon notification from the Emergency Director that the emergency has been terminated, exit this section and enter the Closeout Responsibility/Activity section at step 4.0 Attachment 9.1

4.0 Closeout Responsibility/Activity

- 4.1** Direct the Control Room staff to return all equipment utilized in the response to proper storage locations.
- 4.2** Review all documentation the Control Room staff generated during the emergency:
 - A. Ensure all logs, forms and other documentation is complete.
 - B. Ensure all temporary procedures used and/or developed are properly documented for use by the Recovery Organization so that necessary actions can be taken for long-term restoration.
 - C. Collect all computer printouts and strip charts.
- 4.3** Provide all logs and records to the Recovery Manager upon termination of the emergency and entry into the Recovery Phase.

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Attachment 9.2
Shift Manager Response to an Emergency at Other Unit Checklist
(Sheet 1 of 5)

Notes

NOTE:

- This Attachment should not be entered by the Shift Manager if a natural or man-made catastrophic event has occurred and there is a loss of one of the Central Control Rooms. Procedure, 0-AOP-SEC-4 should be entered to support decision making by the SM.


1.0 Initial Responsibility/Activity

1.1 Notification of the Emergency

NOTE:

Shift Managers (SM) **SHALL** confer with each other for any event or condition which may affect both Units such as security or natural events. **IF** it is agreed that both units are affected, **THEN** the Unit 3 SM **SHALL** classify and declare the emergency and assume the role of site Emergency Director in accordance with this procedure, IP-EP-210, **Central Control Room.**

- A. Upon notification from the other Unit's Control Room that an event has been declared, announce the information to Control Room personnel.

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Attachment 9.2

Shift Manager Response to an Emergency at Other Unit Checklist
(Sheet 2 of 5)

Initial Responsibility/Activity (cont.)

Notes

NOTE:

No plant pages are to be made during a security condition when security procedures are in effect **until** determined safe to do so.


1.2 Emergency Classifications

A. UNUSUAL EVENT

1. Upon request from the affected unit, Notify OR Mobilize ERO using ERO Notification Envelope.
2. Make a PA announcement providing information regarding the event and any additional information as required restricting access to areas affected by the emergency.

B. ALERT

1. **IF** not already completed, upon request from the affected unit, Mobilize ERO using **ERO Notification Envelope**.
2. Sound the Site Assembly Alarm for (10) seconds (coordinate sounding of the assembly alarm with affected Unit CCR) and make the following announcement, (2) times, over the public address system.
 - *“Attention all personnel, Attention all personnel, an ALERT has been declared at _____. All Emergency Response Organization personnel report to your assigned Emergency Response Facility. All other non-essential personnel are released from the site.”*
3. Upon request from the Emergency Director, provide an On-Shift RP Technician OR On-Shift Chemistry Technician to support response.
4. **IF** requested by other Unit's SM/ED, **THEN** verify ERDS is transmitting OR activate ERDS per Section 1.2 of Attachment 9.1 within 1 hour of declaration.

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Attachment 9.2
Shift Manager Response to an Emergency at Other Unit Checklist
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Initial Responsibility/Activity (cont.)

Notes

C. SITE AREA EMERGENCY / GENERAL EMERGENCY

1. **IF** not already completed, upon request from the affected unit, Mobilize ERO using **ERO Notification Envelope**.


2. Sound the Site Assembly Alarm for (10) seconds (coordinate sounding of the assembly alarm with other Unit CCR) and make the following announcement (2) times over the public address system:
 - *“Attention all personnel, Attention all personnel, an SAE/GE has been declared at _____. All Emergency Response Organization personnel report to your assigned Emergency Response Facility. All other non-essential personnel are released from the site.”*

3. **IF** a Radiological Release has occurred, **THEN** direct the On-Shift Radiation Protection Technician to take proper Radiological Controls and perform Habitability surveys as required or if necessary.

4. **IF** the affected plant Control Room has been evacuated AND dose assessment results indicate offsite consequences in excess of the EPA Protective Action Guidelines, **THEN** evaluate the need to modify the General Emergency PARs per IP-EP-410, Protective Action Recommendations.

5. Upon request from the Emergency Director, provide a Shift RP Technician OR On-Shift Chemistry Technician to support response.

6. **IF** requested by other Unit's SM/ED, **THEN** verify ERDS is transmitting OR activate ERDS per Section 1.2 of Attachment 9.1 within 1 hour of declaration.

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Attachment 9.2
Shift Manager Response to an Emergency at Other Unit Checklist
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Initial Responsibility/Activity (cont.)

Notes

D. Radiological Release

NOTE:


The term 'Release' as it is used at IPEC for Emergency Planning is defined as "A release of radioactive materials due to the classified event" (per NYS Radiological Emergency Data Form, Part 1).

NOTE:

A release of radioactive materials due to the classified event (per NYS Radiological Emergency Data Form, Part 1). In accordance with the Part 1 form, "release" is classified as one of the four (4) following descriptions:

- A. No Release
- B. Release BELOW Federal Limits
- C. Release ABOVE Federal Limits
- D. Unmonitored Release Requiring Evaluation

1. Announce the information to the Control Room.
2. Direct Control Room personnel to make appropriate Plant Pages.
3. **IF** opposite Unit has a Radiological Release, **THEN** place CCR ventilation in Recirculation Mode.
4. Contact the On-Shift Radiation Protection Technician to take proper Radiological Controls and perform Habitability surveys as required or if necessary.
5. Direct On-Shift Chemistry Technician to provide dose assessment support, as required.

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Attachment 9.3
Control Room Communicator Checklist
Sheet 1 of 6

Notes

NOTE:

The expectation for all ERO positions is to use WebEOC for log-keeping purposes. Reference to traditional paper forms remains in this checklist for the situation in which WebEOC is unavailable, such as a power or computer failure.


1.0 Initial Responsibility/Activity

1.1 Assume the Duties of Control Room Communicator

NOTE:

- 1) Notification of State and local authorities SHALL be completed within 15 minutes of emergency declaration.
- 2) Notification to NRC SHALL be initiated within 1 hour of the emergency declaration.

- A. Upon being notified to fulfill the Control Room Communicator role, **IMMEDIATELY** report to the affected Unit's Control Room.
- B. Inform the Shift Manager (Emergency Director) **AND** the Control Room staff, you have assumed the duties of Control Room Communicator.
- C. **IF** making the initial notification for a Notification of Unusual Event classification, **THEN**, proceed to step 1.2.
- D. **IF** making the initial notification for an Alert or higher classification, **THEN**, proceed to step 1.4.
- E. **IF** making a periodic update of the NUE, **THEN** proceed to step 2.1
- F. **IF** making a periodic update of the Alert/SAE/GE, **THEN** proceed to step 2.2
- G. **IF** making an upgrade classification, **THEN** proceed to step 2.3.

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Attachment 9.3
Control Room Communicator Checklist
Sheet 2 of 6

Initial Responsibility/Activity (cont.)


Notes

1.2 Perform Confirmation of Receipt of Initial UNUSUAL EVENT Notifications (Use Form EP-3N)

- A. Obtain the completed and signed NYS Radiological Emergency Data Form Part I (Form EP-1) from the Shift Manager. Review form to ensure all required information is complete and accurate, including Shift Manager (Emergency Director) signature.
- B. Verify SM has sent electronic Fax and email of the NYS Radiological Data Form Part I to State/Counties/EOF.
- C. Using, "Control Room NUE Notification Checklist" (Form EP-3N) complete the initial roll call to State and counties within 15 minutes of the declaration of the Unusual Event. Confirm notification to each location.
- D. **IF** time challenged to meet the 15 minute requirement, **THEN** immediately initiate the RECS call. Following roll call, inform State and counties that FAX and email of Part 1 Form will follow.
- E. **IF** plant condition/emergency classification changes prior to initiating notification:
 - a. Disregard previous classification and continue notification with highest current classification.
 - b. Follow-up notification **SHALL** include details of all conditions/emergency classifications.
- F. **IF** plant condition/emergency classification changes while performing notification, **THEN** continue notification and state at the end the following "Changes in plant conditions indicate a potential for escalating the Emergency Classification. State and local authorities **SHALL** be notified within 15 minutes."

1.3 Support Shift Manager (Emergency Director) with other notifications.

- A. Complete the remaining notifications as specified on the Control Room NUE Notification Checklist (Form EP-3N).

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Attachment 9.3
Control Room Communicator Checklist
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Initial Responsibility/Activity (cont.)

Notes

1.4 Perform confirmation of receipt of Initial ALERT/SAE/GE Notifications (Use Form EP-3A, 3S or 3G as applicable)

- A. Obtain the completed and signed NYS Radiological Emergency Data Form Part I (Form EP-1) from the Shift Manager. Review form to ensure all required information is complete and accurate, including Shift Manager (Emergency Director) signature.
- B. Verify the SM has sent Fax and E-mail of the NYS Radiological Data Form Part I to State/Counties/EOF.
- C. **IF** time challenged to meet the 15 minute requirement, **THEN immediately** initiate the RECS call. Following roll call, inform State and counties that FAX and email of Part 1 Form will follow.
- D. Using "Control Room Notification Checklist Alert/SAE/GE (Form EP-3A, EP-3S or EP-3G as applicable), complete the initial roll call to State and Counties within 15 minutes of the declaration of the Alert, SAE or GE. Confirm notification to each location.
- E. Complete the remaining notifications as specified on the Forms (EP-3A, EP-3S or EP-3G as applicable).
- F. **IF** plant condition/emergency classification changes prior to initiating notification:
 - a. Disregard previous classification and continue notification with highest current classification.
 - b. Follow-up notification **SHALL** include details of all conditions/emergency classifications.
- G. **IF** plant condition/emergency classification changes while performing notification, **THEN** continue notification and state at the end the following "Changes in plant conditions indicate a potential for escalating the Emergency Classification. A completed Part I will be transmitted within 15 minutes.

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Attachment 9.3
Control Room Communicator Checklist
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Initial Responsibility/Activity (cont.)

Notes

1.5 Support Shift Manager (Emergency Director) with other notifications

- A. Determine if personnel assembly is being suspended from the Emergency Director.
- B. Request direction from Shift Manager (Emergency Director) AND initiate notification of personnel located in the Protected Area if requested.
- C. Complete the remaining notifications as specified on the Form (EP-3A, EP-3S or EP-3G Checklist as applicable).


2.0 Continuous Responsibility/Activity

2.1 Perform Periodic Update Notifications – UNUSUAL EVENT (Use Form EP-3)

NOTE:

Periodic Update Notifications to offsite authorities shall be made approximately every 30 minutes or whenever conditions change. Time interval may be lengthened with concurrence of offsite agencies.

- A. Obtain the completed NYS Radiological Emergency Data Form Part I (Form EP-1) from the Shift Manager. Review the form to ensure all required information is complete and accurate, including Emergency Director's signature.
- B. Verify Fax and email of the NYS Radiological Data Form Part I to State/Counties/EOF.
- C. Using Control Room NUE Notification Checklist (Form EP-3N) perform notifications as needed, to make the periodic update notifications. Confirm notification to each location.
- D. Fax, or have Support Staff Fax, copies of the NYS Radiological Data Form Part 1 to State/Counties/EOF.

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Attachment 9.3
Control Room Communicator Checklist
Sheet 5 of 6

Continuous Responsibility/Activity (cont.)


Notes

**2.2 Perform Periodic Update Notifications – Alert/SAE/GE
(Use Form EP-3A, 3S or 3G as applicable)**

NOTE:

Periodic Update Notifications to offsite authorities SHALL be made approximately every 30 minutes or whenever conditions change. Time interval may be lengthened with concurrence of offsite agencies.

- A. Obtain the completed NYS Radiological Emergency Data Form Part I (Form EP-1) (Part II if a radiological release has occurred or is in progress) from the Emergency Director. Review form to ensure all required information is complete and accurate, including Emergency Director's signature.
 - B. Verify the SM has sent Fax and email of the NYS Radiological Data Form Part I to State/Counties/EOF.
 - C. Using an Alert/SAE/GE Checklist (Form EP-3A, 3S or 3G as applicable) start the roll call to State and Counties. Confirm notification to each location.
 - D. Complete the remaining notifications as specified on the Form (EP-3A, 3S or 3G as applicable) Checklist.
- 2.3 IF the Emergency Classification is Upgraded, THEN Perform Upgrade Notifications (using Form EP-3A, 3S or 3G as applicable)**
- A. Obtain the completed NYS Radiological Emergency Data Form Part I (Form EP-1) from the Emergency Director. Review form to ensure all required information is completed, including Emergency Director's signature.
 - B. Verify the SM has sent Fax and email of the NYS Radiological Data Form Part I to State/Counties/EOF.
 - C. Using an Alert/SAE/GE Checklist (Form EP-3A, 3S or 3G as applicable) start the roll call to State and Counties within 15 minutes of upgrade of the emergency classification.

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Continuous Responsibility/Activity (cont.)

Notes

- D. Fax, or have Support Staff fax, copies of the NYS Radiological Data Form Part 1 to the State/Counties/EOF, **if** required. Confirm notification to each location.
- E. Support Shift Manager, as needed, with the remaining notifications as specified on the Checklist.

3.0 Closeout Responsibility/Activity

- 3.1 When directed by the Shift Manager, return all equipment utilized in the response to proper storage locations.**
- 3.2 Review all documentation the Control Room Communicators generated during the emergency:**
 - A. Ensure all logs, forms and other documentation is complete.
 - B. Collect all forms, logs and other documentation.
- 3.3 Provide all logs and records to the Recovery Manager upon termination of the emergency and entry into the Recovery Phase.**


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Attachment 9.4
Facility Communicator Checklist
Sheet 1 of 2

NOTE:

The expectation for all ERO positions is to use WebEOC for log-keeping purposes. Reference to traditional paper forms remains in this checklist for the situation in which WebEOC is unavailable, such as a power or computer failure.

- | 1.0 <u>Initial Responsibility/Activity</u> | <u>Notes</u> |
|---|---------------------|
| 1.1 Assume the Duties of Facility Communicator <ul style="list-style-type: none"> A. Upon being notified to fulfill the Facility Communicator role, IMMEDIATELY report to the Control Room. B. Inform the Shift Manager and the Control Room staff that you are assuming the duties of Facility Communicator. C. <u>IF</u> not already established, <u>THEN</u> establish an open line of communications over the Direct Line: <ul style="list-style-type: none"> 1. TSC 2. EOF 3. AEOF (if activated) D. Inform the Shift Manager that you have established communications with the TSC/OSC and (A)EOF. | |

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Attachment 9.4
Facility Communicator Checklist
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- | | |
|--|--------------|
| 2.0 <u>Continuous Responsibility/Activity</u> | Notes |
| 2.1 <u>Maintain Communications with the TSC, OSC and (A)EOF</u> | |

NOTE:


The primary responsibility of the Facility Communicator is to provide an open line of communication between the CCR and TSC; however, the Technical Advisor to the Emergency Director in the EOF will periodically monitor the communications line or will request information from the CCR and TSC.

- A. Transmit information as requested by the TSC, OSC and EOF.
 - B. Notify the OSC Operations Support Position of teams (NPO's, Chemists etc.) that have been dispatched from the CCR AND log this information into WebEOC.
 - C. Support Shift Manager (ED) or POM if in place, with coordination of dispatching and controlling of NPOs assigned to perform in-plant operations with the Operations Support position located in the OSC.
 - D. Use an ERO Log Sheet (Form EP-3-ALL) to maintain a log.
 - 1. Log the time when you assumed the duties of Facility Communicator.
 - 2. Log significant communications pertaining to plant operations and emergency events.
- 3.0 Closeout Responsibility/Activity**
- 3.1 When directed by the Shift Manager, return all equipment utilized in the response to proper storage locations.**
- 3.2 Review all documentation that was generated during the emergency:**
- A. Ensure all logs, forms and other documentation is complete.
 - B. Collect all forms, logs and other documentation.
- 3.3 Provide all logs and records to the Shift Manager upon termination of the emergency and entry into the Recovery Phase.**

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Attachment 9.5
On-Shift Radiation Protection Technician Checklist
(Sheet 1 of 4)

- | 1.0 <u>Initial Responsibility/Activity</u> | <u>Notes</u> |
|---|---------------------|
| 1.1 Assume the Duties of CR Radiation Protection Technician | |
| A. <u>IF</u> the declared emergency is an Alert or higher, <u>THEN</u> first contact the Control Point and obtain a list of personnel still in RCA. | |
| B. IMMEDIATELY provide list of individuals still in the RCA to the Shift Manager. | |
| C. Inform the Shift Manager and the Control Room staff that you are assuming the duties of the On-Shift Radiation Protection Technician. | |
| 1.2 Establish Initial CCR Radiological Protection | |
| A. Evaluate the need and make a recommendation to establish radiological access control for the Control Room. <ol style="list-style-type: none"> 1. Ask the Shift Manager if there is potential for abnormal radiological conditions outside of the RCA. 2. Evaluate PRM-ARM instrumentation. | |
| B. Place a DLR and dosimeter on the computer terminal by the RO's desk. | |
| C. Issue DLR and dosimeters to persons who are dispatched from the CCR, if necessary. | |

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Attachment 9.5
On-Shift Radiation Protection Technician Checklist
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Initial Responsibility/Activity (cont.)

Notes

- D. **IF** conditions warrant, or the Shift Manager directs the Control Room radiological controls be established, **THEN**:
1. Set up step off pad (SOP) requiring shoe check and frisker at the CR entrance.
 2. Post rear door with "NO ENTRY/EXIT" signs.
 3. Place SOPs in a position that does not preclude opening the door while standing on the SOP.
 4. Set up Frisker and perform periodic contamination surveys on both sides of the SOP.
 5. Perform periodic (hourly or as directed) airborne contamination checks with HD-28B or equivalent.
 6. Record results on applicable forms and survey maps.
 7. Advise the Shift Manger that radiological controls have been established as required and continue to monitor for habitability.


2.0 Continuous Responsibility/Activity

2.1 Provide Radiological Protection.

NOTE:

The actions and responsibilities listed in this procedure are intended to assist the CCR Radiation Protection Technician in the performance of his/her duties. While some items are performed once, others are repeated over the duration of the event.

- A. Provide radiological support, such as issuance of dosimetry, determination of respiratory and protective clothing requirements, and performance of radiological surveys for the following activities, as directed by the Shift Manager:
1. Search and rescue
 2. Repair and corrective actions


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Attachment 9.5
On-Shift Radiation Protection Technician Checklist
Sheet 3 of 4

Continuous Responsibility/Activity (cont.)


Notes

3. Response to fires by Fire Brigade (includes survey /decontamination of Fire Department personnel and equipment).
 4. Personnel and equipment decontamination.
 5. As requested by the Shift Manager.
- B. Conduct outside surveys as requested by the Shift Manager.
- C. Provide Radiological Support for Personnel Medical Emergencies.
1. Upon notification, a personnel medical emergency has occurred onsite, report to the scene with survey instrument(s).
 2. Support Medical response as necessary.
- D. **IF** radiological conditions warrant **AND** requested by the Shift Manager/ED, issue KI to control room personnel.
1. Conduct applicable radiological and/or KI briefings to CCR personnel.
 2. Utilize Form EP-8-ALL to document date, time and name of personnel ingesting KI.
- E. Notify the Shift Manger that Potassium Iodine (KI) has been distributed and documented.
- 2.2 Use ERO Log Sheet(s) (Form EP-3-ALL) to maintain a log.**
- A. Log the time when you assumed the duties of CCR Radiation Protection Technician.
 - B. Log significant communications pertaining to personnel radiological conditions and actions.
 - C. Log any other significant information pertaining to actions taken as duty of Radiation Protection Technician (i.e., surveys completed dosimetry issuance, A/S results, etc.).

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Attachment 9.5
On-Shift Radiation Protection Technician Checklist
Sheet 4 of 4

- | 3.0 <u>Closeout Responsibility/Activity</u> | <u>Notes</u> |
|---|---------------------|
| 3.1 When directed by the Shift Manager, return all equipment utilized in the response to proper storage locations. | |
| 3.2 Review all documentation that was generated during the emergency: <ul style="list-style-type: none"> A. Ensure all logs, forms and other documentation is complete. B. Collect all forms, logs and other documentation. | |
| 2.2 Provide all logs and records to the Shift Manager upon termination of the emergency and entry into the Recovery Phase. | |

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Attachment 9.6
On-Shift Chemistry Technician Checklist
(Sheet 1 of 2)

- | 1.0 <u>Initial Responsibility/Activity</u> | <u>Notes</u> |
|--|---------------------|
| 1.1 Assume the Duties of On-Shift Chemistry Technician. <p style="margin-left: 20px;">A. Upon being notified to fulfill the On-Shift Chemistry Technician role, IMMEDIATELY report to the Control Room.</p> <p style="margin-left: 20px;">B. Inform the Shift Manager and the Control Room staff that you are assuming the duties of On-Shift Chemistry Technician.</p> | |
| 1.2 Assist the Shift Manager/Plant Operations Manager with Emergency Planning duties as requested. | |
| 2.0 <u>Continuous Responsibility/Activity</u> | |
| 2.1 Use ERO Log Sheet(s) (Form EP-3-ALL) to maintain a log. <p style="margin-left: 20px;">A. Log the time when you assumed the duties of On-Shift Chemistry Technician.</p> <p style="margin-left: 20px;">B. Log significant communications pertaining to radiological releases and emergency events.</p> | |

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Attachment 9.6
On-Shift Chemistry Technician Checklist
(Sheet 2 of 2)

- | 3.0 <u>Closeout Responsibility/Activity</u> | <u>Notes</u> |
|--|---------------------|
| 3.1 When directed by the Shift Manager, return all equipment utilized in the response to proper storage locations. | |
| 3.2 Review all documentation generated during the emergency: | |
| A. Ensure all logs, forms and other documentation is complete. | |
| B. Collect all forms, logs and other documentation. | |
| 3.3 Provide all logs and records to the Shift Manager upon termination of the emergency and entry into the Recovery Phase. | |

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Attachment 9.7
Support Staff Checklist
(Sheet 1 of 4)

- | 1.0 <u>Initial Responsibility/Activity</u> | <u>Notes</u> |
|--|---------------------|
| 1.1 Assume the Duties of Support Staff <ul style="list-style-type: none"> A. Upon being notified to fulfill the Support Staff role, IMMEDIATELY report to the Control Room. B. Inform the Shift Manager and the Control Room staff, you are assuming the duties of Support Staff. | |
| 1.2 Assist the Plant Operations Manager (POM) with CCR set-up. <ul style="list-style-type: none"> A. Distribute Position Specific Binders to the following: <ul style="list-style-type: none"> 1. SM/POM 2. CCR Communicator 3. Facility Communicator 4. On-Shift Radiation Protection Technician 5. On-Shift Chemistry Technician 6. Support Staff B. Plug in phones and headsets, if needed. C. Verify the IPEC 10-mile Wind Sector Map in-place. D. Verify appropriate emergency classification signs in place (NUE, Alert, SAE, and GE). E. Set up and test fax machines. F. Notify SM/POM (ED) that CCR setup is complete. | |

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Attachment 9.7
Support Staff Checklist
(Sheet 2 of 4)

1.0 Initial Responsibility/Activity (cont.)

Notes

NOTE:
Personnel who enter the CCR using the card readers are automatically accounted for in the accountability report generated by the LAO

1.3 Assist with Accountability

- A. **IF** the Accountability Card Readers become inactive, **THEN** use (Form EP-47), Accountability Roster, to generate a list of individuals, in your facility and their badge numbers.
- B. Using (Form EP-47), Accountability Roster, record the names, badge numbers and locations of any watch personnel located in the field and forward roster to the Lead Accountability Officer (LAO).


2.0 Continuous Responsibility/Activity

2.1 Provide Radiological Protection.

- A. Using (Form EP-47), Accountability Roster, generate a list and record the names, badge numbers and locations of any individuals as they enter/exit the control room.

2.2 Assist POM in scheduling second shift

- A. Rosters of trained personnel are located in the Emergency Telephone Directory.
- B. Call office extensions, beepers and home numbers as necessary to identify and schedule second shift relief. Complete CCR staffing using Form EP-43 **AND** forward to Admin & Logistics Coordinator in EOF.

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Attachment 9.7
Support Staff Checklist
(Sheet 3 of 4)

2.0 Continuous Responsibility/Activity (cont.)

Notes

**2.3 IF CCR MIDAS is not available to FAX NYS forms,
THEN Fax forms, when completed, to off-site agencies and emergency facilities:**

NOTE:


1) WHEN NYS and County EOCs are activated,
THEN discontinue faxing Part I forms to Warning Points.

2) When the EOF assumes responsibility for offsite notifications,
THEN discontinue faxing Part I and Part II forms to offsite agencies.

- A. "NYS Radiological Emergency Data Form" Part I "General Information Instructions" (Form EP-1):
 - 1. NYS/County Warning Points
 - 2. NYS/County EOCs
 - 3. EOF/AEOF
 - 4. JIC

- B. "NYS Radiological Emergency Data Form" Part II "Radiological Assessment Data" (Form EP-2)
 - 1. NYS/County EOCs
 - 2. EOF/AEOF
 - 3. JIC

- C. When the (A)EOF assumes responsibility for offsite notifications, discontinue faxing Part I and Part II forms to offsite agencies.
 - 1. IF MRP-DAS is not operational THEN fax the following completed forms to the TSC and (A)EOF:
 - For Unit 2 – Form EP-53, Form EP-54, and Form EP-55.
 - For Unit 3 - Form EP-57, Form EP-58, and Form EP-59.


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Attachment 9.8
CCR Dose Assessor Checklist
(Sheet 1 of 2)

NOTE:

This position is normally staffed by the unaffected unit's on-shift Chemistry Technician.

- | | |
|--|---------------------|
| 1.0 <u>Initial Responsibility/Activity</u> | <u>Notes</u> |
| 1.1 Assume the Duties of a CCR Dose Assessor | |
| A. Upon being notified of a Declared Emergency
<u>IMMEDIATELY</u> report to the normally assigned Control Room. | |
| B. Inform the Shift Manager that you are available to perform the
duties of the CCR Dose Assessor. | |
| 2.0 <u>Continuous Responsibility/Activity</u> | |
| 2.1 Assist the Shift Manager/Plant Operations Manager with
 Emergency Planning duties as requested. | |

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Attachment 9.8
CCR Dose Assessor Checklist
(Sheet 2 of 2)

Continuous Responsibility/Activity

Notes

NOTE:

- IP-EP-340 Attachment 9.4, 9.5, and 9.11 may be used for CCR Plant Vent Quick Dose, CCR S/G Tube Rupture Quick Dose, and CCR Multiple Accident Calculations respectively.
- A NYS Part 2 Form SHALL be completed as soon as possible after it has been determined that a release above Federal Limits exists, a significant change in the radiation release, and updated approximately 30 minutes.

- A. Perform Dose Assessment using IP-EP-340
 - B. Produce a NYS Part 2 Form
 - C. Get NYS Part 2 Form approved by the Shift Manager
 - D. Transmit NYS Part 2 Form
- 2.2 Determine need for a subsequent dose assessment and Part 2, (Perform if necessary).
- 2.3 When directed by the Shift Manager, turn over Dose Assessment responsibilities to the Dose Assessor in the EOF.
- 3.0 Closeout Responsibility/Activity**
- 3.1 When directed by the Shift Manager, return all equipment utilized in the response to proper storage locations.**
- 3.2 Review all documentation generated during the emergency:**
- A. Ensure all logs, forms and other documentation is complete.
 - B. Collect all forms, logs and other documentation.
- 3.3 Provide all logs and records to the Shift Manager upon termination of the emergency and entry into the Recovery Phase**

10CFR50.54(Q)(2) Review

Procedure/Document Number: IP-EP-241	Revision: 6
Equipment/Facility/Other: Indian Point Energy Center	
Title: Incident Command Post	

Part I. Description of Activity Being Reviewed (event or action, or series of actions that have the potential to affect the emergency plan or have the potential to affect the implementation of the emergency plan):

Procedure was revised, to reflect the requirement in the Post Unit 2 Shutdown Eplan (PSEP), as submitted to the NRC per LAR, license #NL-19-001. See attached matrix for changes made. Procedure will be effective on June 1, 2020,

Part II. Emergency Plan Sections Reviewed (List all emergency plan sections that were reviewed for this activity by number and title. IF THE ACTIVITY IN ITS ENTIRETY IS AN EMERGENCY PLAN CHANGE, EAL CHANGE OR EAL BASIS CHANGE, ENTER THE SCREENING PROCESS. NO 10CFR50.54(q)(2) DOCUMENTATION IS REQUIRED.

Part 1 Introduction:

Section A: Purpose

Part 2 Planning Standards and Criteria:

Section A: Assignment of Responsibility

Section E: Notification Methods and Procedures

Section H: Emergency Facilities and Equipment

Part III. Ability to Maintain the Emergency Plan (Answer the following questions related to impact on the ability to maintain the emergency plan):

- Do any elements of the activity change information contained in the emergency plan (Section 3.0 Step 6)?
YES NO IF YES, enter screening process for that element
- Do any elements of the activity change an emergency classification Initiating Condition, Emergency Action Level (EAL), associated EAL note or associated EAL basis information or their underlying calculations or assumptions?
YES NO IF YES, enter screening process for that element
- Do any elements of the activity change the process or capability for alerting and notifying the public as described in the FEMA-approved Alert and Notification System design report?
YES NO IF YES, enter screening process for that element
- Do any elements of the activity change the Evacuation Time Estimate results or documentation?
YES NO IF YES, enter screening process for that element
- Do any elements of the activity change the Onshift Staffing Analysis results or documentation?
YES NO IF YES, enter screening process for that element

10CFR50.54(Q)(2) Review

Procedure/Document Number: IP-EP-241	Revision: 6
Equipment/Facility/Other: Indian Point Energy Center	
Title: Incident Command Post	

Part IV. Maintaining the Emergency Plan Conclusion The questions in Part III do not represent the sum total of all conditions that may cause a change to or impact the ability to maintain the emergency plan. Originator and reviewer signatures in Part V document that a review of all elements of the proposed change have been considered for their impact on the ability to maintain the emergency plan and their potential to change the emergency plan.

1. Provide a brief conclusion that describes how the conditions as described in the emergency plan are maintained with this activity.
2. Check the box below when the 10CFR50.54(q)(2) review completes all actions for all elements of the activity – no 10CFR50.54(q)(3) screening or evaluation is required for any element. Otherwise, leave the checkbox blank.
 I have completed a review of this activity in accordance with 10CFR50.54(q)(2) and determined that the effectiveness of the emergency plan is maintained. This activity does not make any changes to the emergency plan. No further actions are required to screen or evaluate this activity under 10CFR50.54(q)(3).

Per Post Shutdown Emergency Plan (PSEP), Unit 3 CCR will be the active/running plant and Unit 2 will be at shut down. The changes made to this procedure (see attached matrix) reflects this requirement of the Post Unit 2 Shutdown Eplan, as submitted to the NRC (license # NL-19-001). The NRC has approved the PSEP per RA-20-040.

A review of this activity in accordance with 10 CFR 50.54(q)(2) has been completed and determined that the effectiveness of the PSEP is maintained. This revision aligns the procedure with the protocols of the post Unit 2 shutdown. None of the changes affect the ability to perform classifications, notifications, or PARs, it does not affect activation or staffing of the ERO, and all planning standard requirements are maintained. The changes made do not require a change to the Emergency Action Level scheme, On-shift Staffing study or the PSEP.


No further actions are required to screen or evaluate this activity under 10 CFR 50.54(q)(3).

Part V. Signatures:

Preparer Name (Print) Rebecca A. Martin	Preparer Signature <i>Rebecca A Martin</i>	Date: 5/14/2020
(Optional) Reviewer Name (Print)	Reviewer Signature	Date:
Reviewer Name (Print) Timothy Garvey Nuclear EP Project Manager	Reviewer Signature <i>Rebecca A Martin for T. Garvey</i> Approved Per Telecom	Date: 5/14/2020
Approver Name (Print) Frank Mitchell Emergency Planning Manager or designee	Approver Signature <i>FM Mitchell</i>	Date: 5/15/2020

IP-EP-241 Revision 6 REVISION MATRIX

Change No.	Page/Section	Previous Version	New Version	Editorial Change	Effect on 10 CFR 50.47(b) Planning Standards or NUREG-0654 program elements? Justify if NO.
1.	Page 12 Section 1.1 C1	1. Establish and maintain communications with the Control Room and inform them that the ICP has been activated.	1. Inform the affected Unit CCR that the ICP has been activated. Establish and maintain communications with the Control Room, if they are available.	N	N – Re-ordered words to ensure the CCR was still being informed that the ICP has been activated; however, added "if they are available" to sentence, since Unit 2 may not be able to support with limited staffing available as per Post Shutdown Emergency Plan. (license # NL-19-001) NRC approved per RA-20-040.
2.	Page 15 Section 1.5 Page 21 Section 1.5	Initiate and maintain communication with the Control Room via cell phone, satellite phone or landline.	Initiate and maintain communication with the Control Room, if they are available, via cell phone, satellite phone or landline.	N	N - Added "if they are available" to sentence, since Unit 2 may not be able to support with limited staffing available as per Post Shutdown Emergency Plan. (license # NL-19-001) NRC approved per RA-20-040.

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Attachment 9.1

Emergency Planning Document Change Checklist Form

(All sections must be completed, N/A or place a check on the line where applicable)

Section 1

Doc/Procedure Type:	Administrative <input type="checkbox"/> Implementing <input checked="" type="checkbox"/> EPLAN <input type="checkbox"/> N/A <input type="checkbox"/>
Doc/Procedure No:	IP-EP-241
Doc/Procedure Title:	Incident Command Post
New revision number:	6
Corrective Action:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> CR#: OL-OLI-2018-00090 CA 18
Effective date:	June 1, 2020

Section 2

Change Description

1. Ensure the following are completed, or are not applicable and are so marked:

- a. 50.54q N/A
- b. EN-FAP-OM-023 N/A
- c. IP-SMM- AD-102 N/A
- d. OSRC N/A
- e. NRC Transmittal N/A

(within 30 days)

- 2. List any other documents affected by this change: N/A
- 3. Transmittals are completed: N/A Date: 5/19/2020
- 4. Ensure the proper revision is active in eB Ref. Lib.: N/A
- 5. Approved doc/procedure delivered to Doc. Control for distribution: N/A Date: 5/20/2020
- 6. Position Binders updated: N/A Date: 6/1/2020
- 7. Copy of EPDCC placed in EP file: N/A Date: _____
- 8. Supporting documentation is submitted as a general record in eB Ref. Lib.: N/A Date: 5/20/2020
- 9. Word files are moved from working drafts folder to current revision folder in the EP drive:
 N/A Date: 6/1/2020

IPEC IMPLEMENTING PROCEDURE PREPARATION, REVIEW, AND APPROVAL

IP-SMM-AD-102 Rev:17

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ATTACHMENT 10.2

IPEC PROCEDURE REVIEW AND APPROVAL

(Page 1 of 1)

Procedure Title: Incident Command Post

Procedure No: IP-EP-241 Existing Rev: 5 New Rev: 6 DRN/EC No: DRN-20-00306

Procedure Activity (MARK Applicable)	Converted To IPEC, Replaces:	Temporary Procedure Change (MARK Applicable)
<input type="checkbox"/> NEW PROCEDURE <input type="checkbox"/> GENERAL REVISION <input checked="" type="checkbox"/> PARTIAL REVISION <input type="checkbox"/> EDITORIAL REVISION <input type="checkbox"/> VOID PROCEDURE <input type="checkbox"/> SUPERSEDED	<input type="checkbox"/> Unit 1 Procedure No: _____ _____	<input type="checkbox"/> EDITORIAL Temporary Procedure Change <input type="checkbox"/> ADVANCE Temporary Procedure Change <input type="checkbox"/> CONDITIONAL Temporary Procedure Change Terminating Condition: _____ _____
	<input type="checkbox"/> Unit 2 Procedure No: _____ _____	
	<input type="checkbox"/> Unit 3 Procedure No: _____ _____	
<input type="checkbox"/> RAPID REVISION	Document in Microsoft Word: <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> VOID DRN/TPC No(s): _____

Revision Summary N/A - See Revision Summary Matrix

Implementation Requirements

Implementation Plan? Yes No Formal Training? Yes No Special Handling? Yes No

RPO Dept: Emergency Planning Writer (Print Name/ Ext/ Sign): Rebecca A. Martin/x7106/ Rebecca A. Martin

Review and Approval (Per Attachment 10.1, IPEC Review and Approval Requirements)

1. Technical Reviewer: Kevin Robinson / [Signature] 5-17-2020
 (Print Name/ Signature/ Date)

2. Cross-Disciplinary Reviewers:
 Dept: _____ Reviewer: _____
 (Print Name/ Signature/ Date)
 Dept: _____ Reviewer: _____
 (Print Name/ Signature/ Date)

3. RPO- Responsibilities/Checklist: F. Mitchell [Signature] 5/15/2020
 (Print Name/ Signature/ Date)

- PAD required and is complete (PAD Approver and Reviewer qualifications have been verified)
- Previous exclusion from further LI-100 Review is still valid
- PAD not required due to type of change as defined in 4.6

4. Non-Intent Determination Complete: _____
 (Print Name/ Signature/ Date)

<p><u>NO</u> change of purpose or scope <u>NO</u> reduction in the level of nuclear safety <u>NO</u> voiding or canceling of a procedure, unless requirements are incorporated into another procedure or the need for the procedure was eliminated via an alternate process.</p>	<p><u>NO</u> change to less restrictive acceptance criteria <u>NO</u> change to steps previously identified as commitment steps <u>NO</u> deviation from the Quality Assurance Program Manual <u>NO</u> change that may result in deviations from Technical Specifications, FSAR, plant design requirements or previously made commitments.</p>
--	--

5. On-Shift Shift Manager/CRS: _____
 (Print Name/ Signature/ Date)

6. User Validation: User: _____

7. Special Handling Requirements Understood: _____



IPEC
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IMPLEMENTING
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CONTROLLED

Incident Command Post

Prepared by:

Rebecca A. Martin
Print Name

Rebecca A. Martin
Signature

5/17/2020
Date

Approval:

Frank J. Mitchell
Print Name

Frank J. Mitchell
Signature

5/15/2020
Date

Effective Date: June 1, 2020



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1.0 PURPOSE

To describe the activation and operation of the Incident Command Post (ICP) during declared emergencies in accordance with the Emergency Plan for Indian Point Energy Center.

NOTE:

The primary ICP is located at the Buchanan Service Center building (EOF). The alternate ICP is located at the NY State Police (Cortlandt barracks), 1 Memorial Drive, Croton, New York. Depending on circumstances at the time, other alternate ICPs could be established on an ad hoc basis.

2.0 REFERENCES

Indian Point Energy Center Emergency Plan

3.0 DEFINITIONS

None

4.0 RESPONSIBILITIES

4.1 The Security-ICP Liaison is responsible for:

4.1.1 Ensuring adequate staffing of the ICP to support the emergency;

4.1.2 **IF** the event is security related which requires support from Operations and Radiation Protection, **NOTIFY** the Emergency Plant Manager (EPM) or Emergency Director and request the necessary support.

NOTE:


The OPS ICP Liaison and RP ICP Liaison are assigned by the Primary or Alternative TSC/OSC.

4.1.3 Working with the Emergency Director to set priorities for the ICP staff;

4.1.4 Coordinate with the Emergency Director to ensure representatives are kept current on any security related issues;

4.1.5 Ensuring adequate outside resources are tasked to support the emergency;

4.1.6 Coordinating and controlling ingress of offsite responders such as fire, medical, and law enforcement support;

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4.1.7 Directing the activities of the ICP staff to support emergency response.

4.1.8 Support review of Press Releases

4.2 The ICP Staff is responsible for completing tasks as defined in their checklists and/or duties assigned by the Security-ICP Liaison.

5.0 DETAILS

5.1 The Security-ICP Liaison **SHALL** follow the instructions outlined in Attachment 9.1 or 9.2, "Security-ICP Liaison Checklist."

5.2 The Operations (OPS)-ICP Liaison **SHALL** follow the instructions outlined in Attachment 9.3 or 9.4, "Operations (OPS)-ICP Liaison Checklist."

5.3 The Rad Protection (RP)-ICP Liaison **SHALL** follow the instructions outlined in Attachment 9.5 or 9.6, "Rad Protection (RP)-ICP Liaison Checklist."

5.4 The IPEC Integrated Response Plan outlines ICP action for:

5.4.1 Primary and backup communications protocol with onsite and offsite Response Organizations

5.4.2 Relocation of the ICP

5.4.3 Activation of the ICP

5.4.4 General Response considerations

5.4.5 Resource Management

6.0 INTERFACES

6.1 IP-EP-230, "Operations Support Center"

6.2 IP-EP-240, "Security"

6.3 IP-1055, "Fire Emergency Response"


6.4 0-SEC-021, IPEC Integrated Response Plan

7.0 RECORDS

All logs, completed forms, and other records generated during an actual emergency **SHALL** be considered quality records and maintained for the life of the plant.


8.0 REQUIREMENTS AND COMMITMENT CROSS-REFERENCE

None

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9.0 ATTACHMENTS

- 9.1 Security-ICP Liaison Checklist (Primary ICP)
- 9.2 Security-ICP Liaison Checklist (Alternate ICP)
- 9.3 Operations (OPS)-ICP Liaison Checklist (Primary ICP)
- 9.4 Operations (OPS)-ICP Liaison Checklist (Alternate ICP)
- 9.5 Rad Protection (RP)-ICP Liaison Checklist (Primary ICP)
- 9.6 Rad Protection (RP)-ICP Liaison Checklist (Alternate ICP)
- 9.7 Incident Command Post (Primary) Layout
- 9.8 Exposure Control Briefing Video QR Code


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Security-ICP Liaison Checklist (Primary ICP)
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1.0 Initial Responsibility/Activity

1.1 Assume the duties of the Security-ICP Liaison.

- A. Sign in on the available sign-in sheet in the EOF.
- B. Synchronize your time with the EOF clock.
- C. **IF** the Incident Command Post (ICP) is not yet operational, **THEN** perform the following steps:
 - 1. Establish communications with the Emergency Director and notify him that the ICP has been activated.
 - 2. Perform a communications check with the TSC Security Coordinator; inform them you are the Security-ICP Liaison and how you can be contacted.
 - 3. **IF** the TSC Security Coordinator is not yet available, **THEN** perform a communications check with the Unit 2 Secondary Alarm Station (SAS) and the Unit 3 Central Alarm Station (CAS), inform them that you are the Security-ICP Liaison and how you can be contacted. Follow up with a communications check with the OSC Security Coordinator once he or she is onsite.
 - 4. Receive event status briefing from the Emergency Director.
 - 5. Review any Press Releases that have been distributed.
- D. **IF** relieving another Security-ICP Liaison, **THEN** perform the following steps:
 - 1. Review the previous Security-ICP Liaison Emergency Response Organization Log Sheet(s). (Form EP-3-ALL)
 - 2. Receive a briefing from the current Security-ICP Liaison.
 - 3. Do a formal turnover with the current Security-ICP Liaison.

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Security-ICP Liaison Checklist (Primary ICP)
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E. Inform the Emergency Director that you are now filling the duties of the Security-ICP Liaison.

2.0 Continuous Responsibilities/Activity


2.1 Establish and maintain communications with available local law enforcement authorities (LLEA) and other offsite resource representatives (Fire/EMS). Discuss and coordinate the following:

- A. Number of responding members from each agency;
- B. Estimated time of arrival for support resources;
- C. Staging areas for equipment and personnel;
- D. Radiological or other hazards that could delay or impede the police/fire/EMS response;
- E. Dosimetry requirements for offsite resources arriving onsite;
- F. Support review of Press Releases generated from the Joint Information Center;
- G. Inform the Offsite Team Coordinator of any road impediments that could impede Offsite Monitoring Teams.

2.2 Utilize the plant drawings/diagrams contained in the ICP Liaison kit to provide security insight to the Incident Commander.

2.3 Establish and maintain communications with the TSC Security Coordinator. Discuss and coordinate the following:

- A. Arrival of offsite resources and their staging areas.
- B. Advise on the need for any offsite resources to enter the Protected Area or a Vital Area.

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Attachment 9.1
Security-ICP Liaison Checklist (Primary ICP)
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2.4 IF advised by the Incident Commander, establish the ICP at a different location.


- A. Ensure that the Emergency Director and the OSC Security Coordinator are notified as to the logistics of the new location.
- B. When established in the new location, initiate contact with both of these parties.

3.0 Closeout Responsibility/Activity

3.1 Review all documentation.

- A. Verify that logs, forms, and other documentation are complete.

3.2 Provide all documentation to EOF Manager upon termination of the emergency and entry into the Recovery Phase.

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**Attachment 9.2
Security-ICP Liaison Checklist (Alternate ICP)
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1.0 Initial Responsibility / Activity

1.1 Proceed to the location of the Alternate ICP:

New York State Police (Cortlandt Barracks)
1 Memorial Drive, Croton-On-Hudson, NY 10520
Tel: (914) 737-7171

1.2 Contact the Incident Commander and introduce yourself as the IPEC Security-ICP Liaison.

1.3 Request the Incident Commander for introductions to key ICP Command Personnel.

1.4 Obtain the ICP Liaison kit ("Go Bag") from the communications room.

1.5 Utilize the Log Book in your ICP Liaison kit to document significant actions performed and relevant communications.


1.6 Initiate and maintain communication with the CAS/SAS via cell phone, satellite phone or landline. If using the cell phone headset, be careful to select the headset that is already synchronized to that cell phone number.

1.7 Establish communications with the Emergency Director and notify him that the ICP has been activated.

1.8 Perform a communications check with the TSC Security; inform them you are the Security-ICP Liaison and how you can be contacted.

1.9 If requested to establish an open line of communications with multiple groups utilize the Bridge line- xxx-xxx-xxxx in the ETD.

1.10 Utilize the laptop computer as necessary to access site information or make WebEOC entries.

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Security-ICP Liaison Checklist (Alternate ICP)
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1.11 Obtain and wear dosimetry from the ICP Liaison kit. Make sure you know which DLR (by number) is assigned to you so any dose associated with this DLR can be assigned to you after it is read by the dosimetry department.

2.0 Continuous Responsibilities / Activity

2.1 Monitor ICP Activities:

A. Priorities for mitigation hazards in relation to safe shutdown priorities.

2.2. Participate in the ICP Briefings and present new information when it becomes available. Briefings should include:

A. Provide simplified explanations clarifications to ICP personnel of technical details. Information should be tailored for a broad range of disciplines. Acronyms and technical terminology should be avoided.

B. Utilize the plant drawing/diagrams contained in the ICP Liaison kit to provide security insight to the Incident Commander.

C. Provide known hazards, chemicals, high pressure steam leaks, and electrical hazards, potential for explosions.

D. Provide strategies for entering the station if hazards exist.

2.3 Provide station priorities as it applies to the assistance needed from the ICP. Assistance may include:


A. Coordination of search and rescue teams for multiple casualties.

B. Movement of Plant Operators

2.4 General assistance that may be needed at throughout the ICP may include:

A. Interpretation of information.

B. Clarification of station information.

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2.5 Prioritization of station support from the perspective of:


- A. Mitigation of existing hazards;
- B. Sector clearing;
- C. Personnel accountability;
- D. Coordination of Law Enforcement activities;
- E. Coordination of staffing of the Emergency Response facilities;
- F. Fire/EMS.

3.0 Closeout Responsibilities / Activity

3.1 When released by the Incident Commander at the end of the event, perform the following:

- A. Collect all pertinent documentation;
- B. Participate in the After Action Reviews or critiques held at the ICP;
- C. Return to the Alternative TSC/OSC and turn in all documentation to the EPM.

3.2 Return the Security Liaison kit to the storage location, inventory contents and restore supplies as necessary.

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Attachment 9.3
Operations (OPS)-ICP Liaison Checklist (Primary ICP)
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1.0 Initial Responsibility/Activity


1.1 Assume the duties of the Operations (OPS)-ICP Liaison.

- A. Sign in on the available sign-in sheet in the EOF.
- B. Synchronize your time with the EOF clock.
- C. **IF** the Incident Command Post (ICP) is not yet operational, **THEN** perform the following steps:
 - 1. Inform the affected Unit CCR that the ICP has been activated. Establish and maintain communications with the Control Room, if they are available.
 - 2. Establish communications with the Emergency Director and notify him that the ICP has been activated.
 - 3. Receive event status briefing from the Emergency Director.
 - 4. Review any Press Releases that have been distributed.
- D. **IF** relieving another Operations (OPS)-ICP Liaison, **THEN** perform the following steps:
 - 1. Review the previous Operations (OPS)-ICP Liaison Emergency Response Organization Log Sheet(s). (Form EP-3-ALL)
 - 2. Receive a briefing from the current Operations (OPS)-ICP Liaison.
 - 3. Do a formal turnover with the current Operations (OPS)-ICP Liaison.
- E. Inform the Emergency Director that you are now filling the duties of the Operations (OPS)-ICP Liaison.

2.0 Continuous Responsibilities / Activity

2.1 Monitor ICP Activities:

- A. Method of entry (tactical or otherwise) to the station;

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Operations (OPS)-ICP Liaison Checklist (Primary ICP)
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B. Priorities for mitigation hazards in relation to safe shutdown priorities

2.2 Participate in the ICP Briefings and present new information when it becomes available. Briefings should include:

- A. Provide simplified explanations clarifications to ICP personnel of technical details. Information should be tailored for a broad range of disciplines. Acronyms and technical terminology should be avoided.
- B. Utilize the plant drawing/diagrams contained in the ICP Liaison kit to provide operation insight.
- C. Provide known hazards, chemicals, high pressure steam leaks, electrical hazards and potential for explosions.
- D. Provide strategies for entering the station if hazards exist.

2.3 Provide station priorities as it applies to the assistance needed from the ICP. Assistance may include:


- A. Obtaining needed equipment including emergency diesel generators.
- B. Obtaining needed supplies including diesel fuel.
- C. Coordination of fire fighters to extinguish on-going fires.
- D. Coordination of search and rescue teams for multiple casualties.

2.4 General assistance that may be needed at throughout the ICP may include:

- A. Interpretation of information.
- B. Clarification of station information.

2.5 Prioritization of station support from the perspective of:

- A. Keep fuel bundles covered;
- B. Keep fuel bundles cooled;

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Operations (OPS)-ICP Liaison Checklist (Primary ICP)
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- C. Stopping any radiation releases;
- D. Ensure availability of electrical power;
- E. Protective Action Recommendations;
- F. Personnel accountability;
- G. Mitigation of existing hazards.

3.0 Closeout Responsibility/Activity

3.1 Review all documentation.

- A. Verify that logs, forms, and other documentation are complete.

3.2 Provide all documentation to EOF Manager upon termination of the emergency and entry into the Recovery Phase.

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Attachment 9.4
Operations (OPS)-ICP Liaison Checklist (Alternate ICP)
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1.0 Initial Responsibility / Activity

1.1 Upon arrival at the ICP:

- A. Present IPEC badge and Driver's License upon request.
- B. Sign in with the reception officer and obtain ICP badge (if utilized).
- C. Obtain the ICP Liaison kit ("Go Bag") from the communications room.
- D. Synchronize the ICP clock with the CCR and/or AEOF (EOF).

1.2 Contact the Incident Commander and introduce yourself as the IPEC OPS Liaison.

1.3 Request the Incident Commander for introductions to key ICP Command Personnel.

1.4 Utilize the Log Book in your ICP Liaison kit to document significant actions performed and relevant communications.

1.5 Initiate and maintain communication with the Control Room, if they are available, via cell phone, satellite phone or landline. If using the cell phone headset, be careful to select the headset that is already synchronized to that cell phone number.

1.6 If requested to establish an open line of communications with multiple groups utilize the Bridge line- xxx-xxx-xxxx in the ETD.


1.7 Utilize the laptop computer as necessary to access site information.

1.8 Obtain and wear dosimetry from the ICP Liaison kit. Make sure you know which DLR (by number) is assigned to you so any dose associated with this DLR can be assigned to you after it is read by the dosimetry department.

2.0 Continuous Responsibilities / Activity

2.1 Monitor ICP Activities:

- A. Method of entry (tactical or otherwise) to the station;

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Operations (OPS)-ICP Liaison Checklist (Alternate ICP)
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B. Priorities for mitigation hazards in relation to safe shutdown priorities.

2.2 Participate in the ICP Briefings and present new information when it becomes available. Briefings should include:

- A. Provide simplified explanations clarifications to ICP personnel of technical details. Information should be tailored for a broad range of disciplines. Acronyms and technical terminology should be avoided.
- B. Utilize the plant drawing/diagrams contained in the ICP Liaison kit to provide operations insight.
- C. Provide known hazards, chemicals, high pressure steam leaks, electrical hazards, and potential for explosions.
- D. Provide strategies for entering the station if hazards exist.

2.3 Provide station priorities as it applies to the assistance needed from the ICP. Assistance may include:


- A. Obtaining needed equipment including emergency diesel generators;
- B. Obtaining needed supplies including diesel fuel;
- C. Coordination of fire fighters to extinguish on-going fires;
- D. Coordination of search and rescue teams for multiple casualties.

2.4 General assistance that may be needed at throughout the ICP may include:

- A. Interpretation of information;
- B. Clarification of station information.

2.5 Prioritization of station support from the perspective of:

- A. Keep fuel bundles covered;
- B. Keep fuel bundles cooled;

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Operations (OPS)-ICP Liaison Checklist (Alternate ICP)
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- C. Stopping any radiation releases;
- D. Ensure availability of electrical power;
- E. Protective Action Recommendations;
- F. Personnel accountability;
- G. Mitigation of existing hazards.

3.0 Closeout Responsibilities / Activity

3.1 When released by the Incident Commander at the end of the event, perform the following:

- A. Collect all pertinent documentation.
- B. Participate in the After Action Reviews or critiques held at the ICP.
- C. Return to the Alternative TSC/OSC and turn in all documentation to EPM.
- D. Return the OPS Liaison kit to the storage location, inventory contents and restore supplies as necessary.


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Attachment 9.5
Radiation Protection (RP)-ICP Liaison Checklist (Primary ICP)
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1.0 Initial Responsibility/Activity

1.1 Assume the duties of the Radiation Protection (RP)-ICP Liaison

- A. Sign in on the available sign-in sheet in the EOF.
- B. Synchronize your time with the EOF clock.
- C. IF the Incident Command Post (ICP) is not yet operational, **THEN** perform the following steps:
 - 1. Establish communications with the Emergency Director and notify him that the ICP has been activated.
 - 2. Establish communications with the HP Watch in the Control Room and notify them that the ICP has been activated.
 - 3. Receive event status briefing from the Emergency Director.
 - 4. Review any Press Releases that have been distributed.
- D. IF relieving another Radiation Protection (RP)-ICP Liaison, **THEN** perform the following steps:
 - 1. Review the previous Radiation Protection (RP)-ICP Emergency Response Organization Log Sheet(s). (Form EP-3-ALL)
 - 2. Receive a briefing from the current Radiation Protection (RP)-ICP Liaison.
 - 3. Do a formal turnover with the current Radiation Protection (RP)-ICP Liaison.
- E. Inform the Emergency Director that you are now filling the duties of the Radiation Protection (RP)-ICP Liaison.

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Radiation Protection (RP)-ICP Liaison Checklist (Primary ICP)
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2.0 Continuous Responsibilities/Activity

2.1 Monitor ICP Activities:

A. Priorities for mitigation hazards in relation to safe shutdown priorities

2.2 Participate in the ICP Briefings and present new information when it becomes available. Briefings should include:

A. Provide simplified explanations clarifications to ICP personnel of technical details. Information should be tailored for a broad range of disciplines. Acronyms and technical terminology should be avoided.

B. Utilize the plant drawing/diagrams contained in the ICP Liaison kit to provide radiological insight.

C. Provide known hazards, chemicals, high pressure steam leaks, electrical hazards, and potential for explosions.

D. Provide strategies for entering the station if hazards exist.

2.3 Utilize the “just-in-time” Exposure Control Video (also accessible via the QR code in Attachment 9.8) and assist the ICP with radiological briefings of non-radworker trained personnel if requested.

2.4 Provide station priorities as it applies to the assistance needed from the ICP. Assistance may include:


A. Coordination of search and rescue teams for multiple casualties.

B. Provide status of radiological conditions as related to offsite releases.

C. Status of contamination level that impact offsite responders.


D. Relocation of non-essential personnel.

E. Coordination of Field Team movement with ICP and AEOF (EOF).

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Attachment 9.5
Radiation Protection (RP)-ICP Liaison Checklist (Primary ICP)
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- 2.5 General assistance that may be needed at throughout the ICP may include:**
- A. Interpretation of information.
 - B. Clarification of station information.
- 2.6 Prioritization of station support from the perspective of:**
- A. Mitigation of existing hazards.
 - B. Sector clearing.
- 3.0 Closeout Responsibility/Activity**
- 3.1 Review all documentation.**
- A. Verify that logs, forms, and other documentation are complete.
- 3.2 Provide all documentation to EOF Manager upon termination of the emergency and entry into the Recovery Phase.**

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**Attachment 9.6
Radiation Protection (RP)-ICP Liaison Checklist (Alternate ICP)
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1.0 Initial Responsibility / Activity

1.1 Upon arrival at the ICP:

- A. Present IPEC badge and Driver's License upon request.
- B. Sign in with the reception officer and obtain ICP badge (if utilized).
- C. Obtain the ICP Liaison ("Go Bag") kit from the communications room.

1.2 Contact the Incident Commander and introduce yourself as the IPEC RP - ICP Liaison.

1.3 Request the Incident Commander for introductions to key ICP Command Personnel.

1.4 Utilize the Log Book in your ICP Liaison kit to document significant actions performed and relevant communications.

1.5 Initiate communication with the Control Room via cell phone, satellite phone or landline. If using the cell phone headset, be careful to select the headset that is already synchronized to that cell phone number.


1.6 If requested to establish an open line of communications with multiple groups utilize the Bridge line- xxx-xxx-xxxx in the ETD.

1.7 Utilize the laptop computer as necessary to access site information.

1.8 Obtain and wear dosimetry from the ICP Liaison kit. Make sure you know which DLR (by number) is assigned to you so any dose associated with this DLR can be assigned to you after it is read by the dosimetry department.

1.9 Perform radiological surveys as necessary in the ICP for the unfolding events. If radiation readings are above background, ensure you report this information to the AEOF (EOF).

1.10 When authorized by the Alt. TSC/OSC (TSC/OSC) brief IPEC Liaisons only on the use of KI and issue KI to all IPEC Liaisons.

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2.0 Continuous Responsibility / Activity

2.1 Monitor ICP Activities:

A. Priorities for mitigation hazards in relation to safe shutdown priorities.

2.2 Participate in the ICP Briefings and present new information when it becomes available. Briefings should include:

A. Provide simplified explanations clarifications to ICP personnel of technical details. Information should be tailored for a broad range of disciplines. Acronyms and technical terminology should be avoided.

B. Utilize the plant drawing/diagrams contained in the ICP Liaison kit to provide radiological insight.

C. Provide known hazards, chemicals, high pressure steam leaks, electrical hazards and potential for explosions.

D. Provide strategies for entering the station if hazards exist.

2.3 Utilize the “just-in-time” Exposure Control Video (also accessible via the QR code in Attachment 9.8) and assist the ICP with radiological briefings of non-radworker trained personnel if requested.

2.4 Provide station priorities as it applies to the assistance needed from the ICP. Assistance may include:


A. Coordination of search and rescue teams for multiple causalities;

B. Provide status of radiological conditions as related to offsite releases;

C. Status of contamination level that impact offsite responders;

D. Relocation of non-essential personnel;

E. Coordination of Field Team movement with ICP and AEOF (EOF).

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Radiation Protection (RP)-ICP Liaison Checklist (Alternate ICP)
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2.5 General assistance that may be needed at throughout the ICP may include:

- A. Interpretation of information;
- B. Clarification of station information.

2.6 Prioritization of station support from the perspective of:

- A. Mitigation of existing hazards;
- B. Sector clearing.

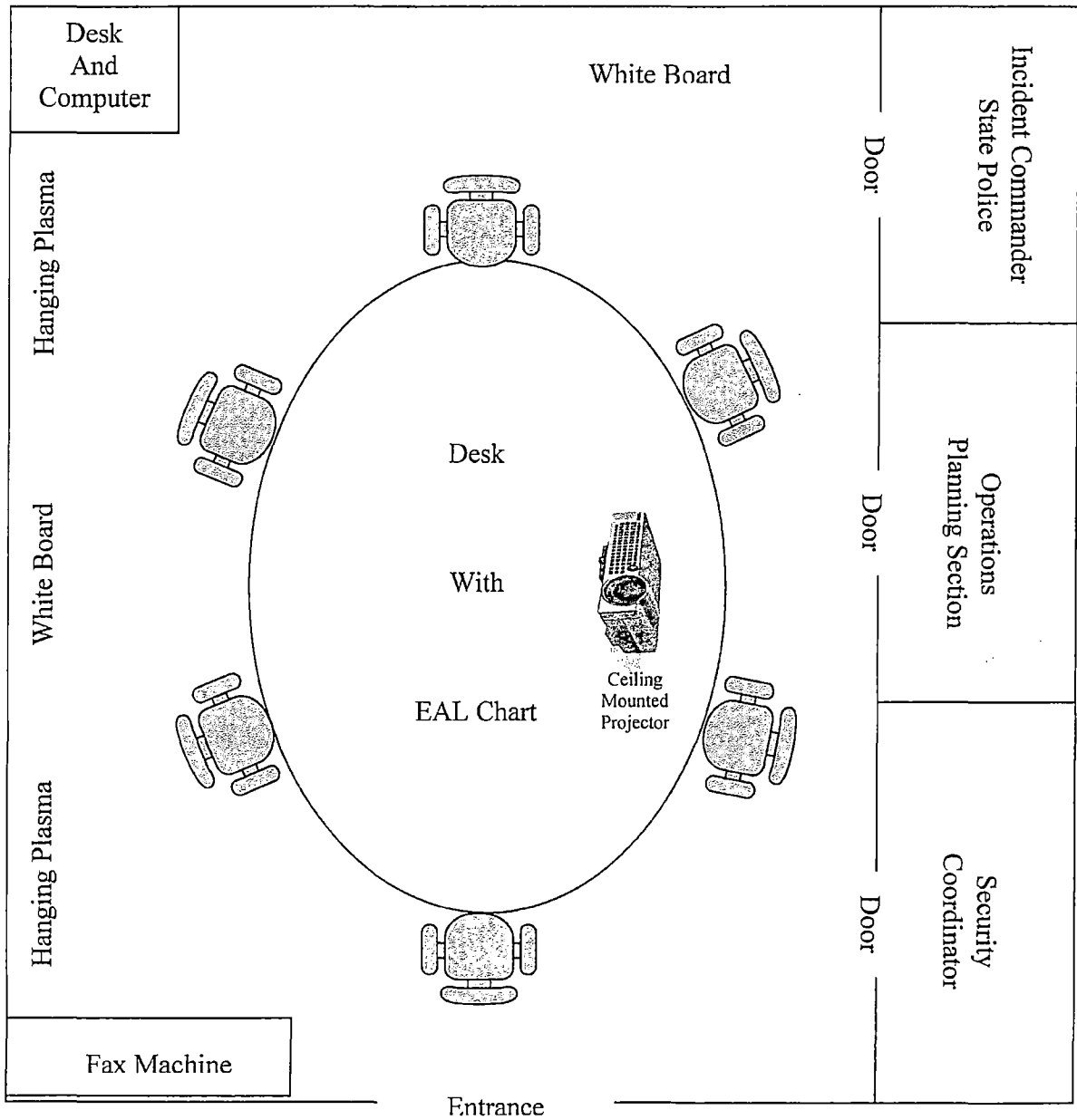
3.0 Closeout Responsibility / Activity

3.1 When released by the Incident Commander at the end of the event, perform the following:

- A. Collect all pertinent documentation.
- B. Participate in the After Action Reviews or critiques held at the ICP.
- C. Return to the Alternative TSC/OSC and turn in all documentation to the EPM.
- D. Return the Rad Protection Liaison kit to the storage location, inventory contents and restore supplies as necessary.

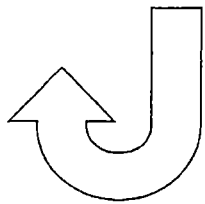
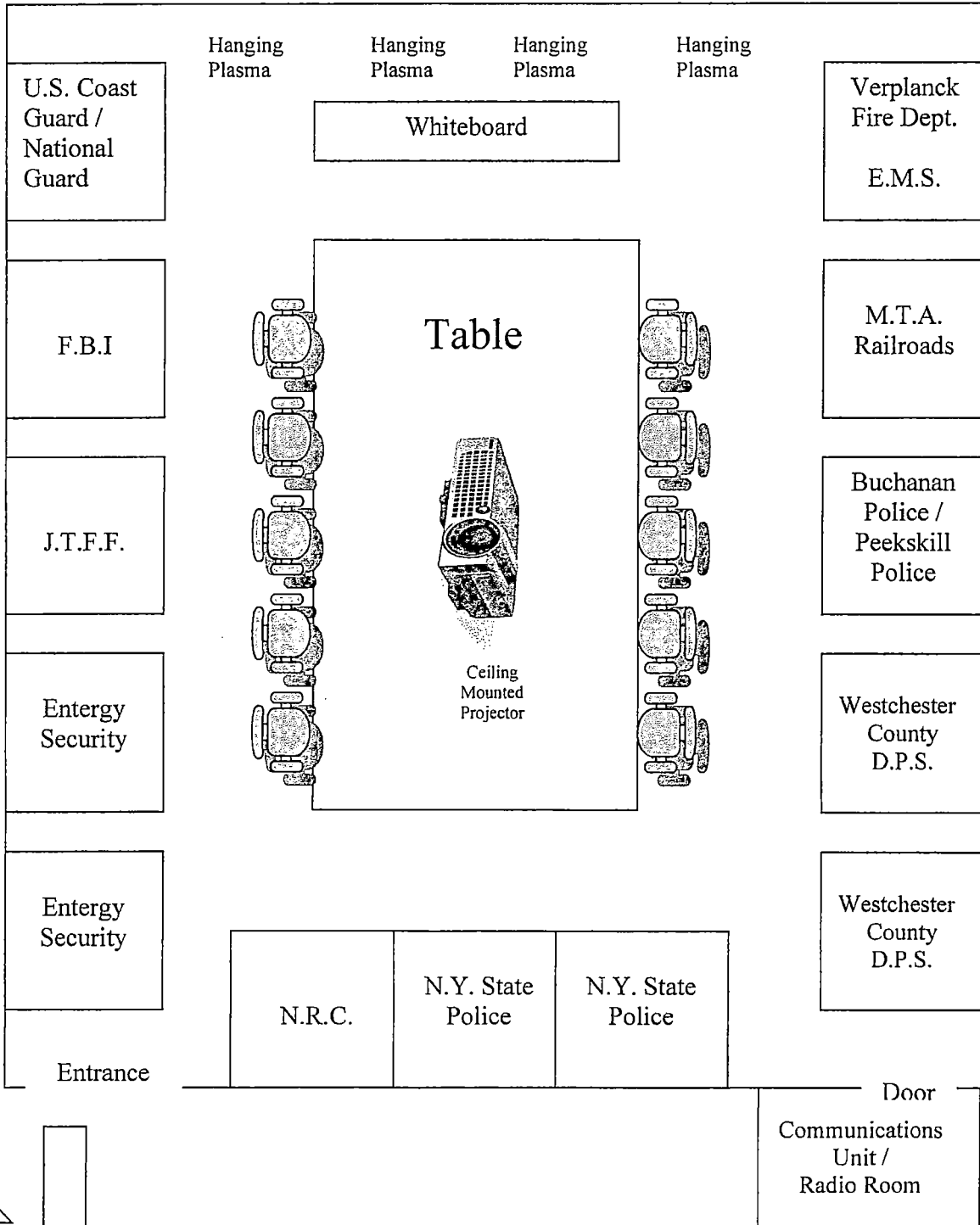



Attachment 9.7
Incident Command Post (Primary) Layout – Security Briefing Room
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Attachment 9.7
Incident Command (Primary) Post Layout – Main Room
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Attachment 9.8
Exposure Control Briefing Video
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To View the Emergency Worker
 Exposure Control Briefing Video
 Scan the QR Code with a Mobile
 Device

