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United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

RE: Nine Mile Point Unit 1
 Docket No. 50-220
 DPR-63

 Nine Mile Point Unit 2
 Docket No. 50-410
 NPF-69

Gentlemen:

Enclosed please find a copy of the following emergency procedure revision for Niagara Mohawk's Nine Mile Point Nuclear Station:

- EPMP-EPP-01, Revision 11, "Maintenance of Emergency Preparedness"

This procedure revision is being submitted as required by Section V to Appendix E of 10 CFR Part 50. Should you have any questions, please feel free to contact Mr. James D. Jones, Director of Emergency Preparedness at (315) 349-4486.

Very truly yours,

John T. Conway
Vice President Nuclear Generation

/cld

Enclosure

- xc:
 Mr. H.J. Miller, Regional Administrator, Region I (2 copies)
 Mr. G. K. Hunegs, Senior Resident Inspector (1 copy)
 Mr. D.S. Hood, Senior Project Manager, NRR (1 copy)
 Mr. S.S. Bajwa, Section Chief PD-I, Section 1, NRR (letter only)
 EP PPF

PDR A Dock

A045

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION
EMERGENCY PLAN MAINTENANCE PROCEDURE

EPMP-EPP-01

REVISION 11

MAINTENANCE OF EMERGENCY PREPAREDNESS

TECHNICAL SPECIFICATION REQUIRED

Approved by:
R. G. Smith

R. G. Smith
Plant Manager - Unit 1

9/20/99
Date

Approved by:
N. C. Paleologos

Nick Paleologos
Plant Manager - Unit 2

9-22-99
Date

CONTROLLED

THIS IS A FULL REVISION

Effective Date: 09/30/1999

LIST OF EFFECTIVE PAGES

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1.0 PURPOSE

To provide guidance in the scheduling of recurring emergency preparedness activities and instruction for the review and approval of emergency preparedness controlled documents and materials to ensure the effective maintenance of the Emergency Preparedness Program.

2.0 RESPONSIBILITIES

2.1 Director Emergency Preparedness

- Schedules all emergency preparedness activities within the required frequency to ensure that the Emergency Response Organization, facilities and equipment are maintained in a constant state of readiness.
- Ensures that emergency preparedness controlled documents and materials are developed, maintained, and revised in accordance with station document administrative requirements and Federal regulations and that the actions implemented by the document are consistent with the philosophy of the Emergency Preparedness Plan and Program.

2.2 The Manager-Nuclear Training

Ensures that personnel assigned to emergency plan duties receive appropriate emergency preparedness training and maintains exercise participant records as evidence of training received through active participation in an emergency exercise or drill.

2.3 The Manager-Nuclear Communications and Public Affairs

- Provides Emergency Preparedness with the support necessary to maintain the public information process, specifically:
 - a. The collection, coordination and development of public information.
 - b. The publication, distribution and historical documentation of public information.
 - c. The development and conduct of the information presentation to the news media.

3.0 PROCEDURE

- ### 3.1 Scheduling of Emergency Preparedness Activities
- The Director Emergency Preparedness shall develop and maintain a Drill, Exercise and Objective Schedule and an Annual Emergency Preparedness Activities Schedule.

- 3.1.1 Schedules may include the activities and objectives listed in Attachments 1 and 2, EPMP-EPP-04 and any additional items deemed necessary to maintain the Emergency Preparedness Program.
 - 3.1.2 Periodic requirements for the testing of emergency related systems and equipment may be demonstrated during a drill or exercise.
 - 3.1.3 Schedules should be developed in cooperation and coordination with station and offsite organizations involved with the particular activity.
 - 3.1.4 Documentation of each item completed on the Activities Schedule must be provided. This documentation may include Training Records, attendee lists, reports and/or letters to file indicating when and how the item was completed.
- 3.2 **Drill and Exercise Report Documentation:** The Director Emergency Preparedness shall ensure that drill reports are developed and issued in accordance with EPMP-EPP-04, "Emergency Exercise/Drill Procedure".
- 3.3 **Annual Recertification of the Nine Mile Point Emergency Preparedness Program** The Director Emergency Preparedness shall ensure that emergency preparedness controlled documents are reviewed for recertification annually as follows:
- 3.3.1 EIPs and EPMPs shall be reviewed by an individual knowledgeable in the area related to the document to determine if changes are necessary or desirable.
 - 3.3.2 The Site Emergency Plan and the Emergency Plan Implementing Procedures shall be recertified annually. All other emergency preparedness controlled documents shall be recertified biennially.
- NOTE:** A full revision of an EPIP or an EPMP shall be sufficient for recertification
- 3.3.3 The annual recertification review of the Site Emergency Plan or EIPs, or a revision which qualifies as the annual recertification review, may include:
 - Any new formal commitments and the actions taken to address these commitments
 - Approved drill, exercise, audit or assessment findings, and actions taken to address those findings.
 - Any procedure, equipment, process or organizational changes which impacts the Emergency Preparedness Program.

3.3.3 (Cont)

- A review of letters of agreement to ensure consistency with the Site Emergency Plan: Include verification of continuity of scope and verification that the effective dates are current.
- A review of all the changes to the Emergency Preparedness Implementing and Maintenance procedures since the last recertification review or last revision.
- A review of all future PCEs written to the Procedures

3.3.4 Plant supervisory staff shall participate in the recertification process, for the purpose of reviewing the site emergency plan and procedures for impact on plant and personnel safety.

Recommended changes shall be approved by the plant managers, and transmitted to the Vice President Nuclear Generation and to the SRAB chairman.

- NOTES:**
1. Plant supervisory staff may be any individual selected by the plant manager from the plant staff.
 2. Plans and procedures that have not been revised since that previous years certification are not required to be reviewed by plant supervisory staff as part of the annual certification.

3.3.5 Prepare a written report to the permanent plant file detailing how those items listed above were included in the Recertification.

3.4 Revision of Controlled Documents The Director Emergency Preparedness shall ensure that emergency preparedness controlled documents (SEP, EIPs and EPMPs) are revised as follows:

- 3.4.1 Revisions to the Site Emergency Plan, Implementing procedures and Maintenance procedures are processed in accordance with all applicable Nuclear Interfacing Procedures (NIPs).
- 3.4.2 Revisions to Emergency Preparedness EIPs and EPMPs shall undergo a 10 CFR 50.54(q) Evaluation and Effectiveness Review in accordance with Attachment 3.
- 3.4.3 Revisions to the Emergency Action Levels may be discussed and agreed upon with the State and local authorities and J. A. Fitzpatrick.

3.4.4 The Director Emergency Preparedness shall ensure distribution of all approved revisions to the Emergency Plan or Implementing procedures to the NRC within 30 days of the effective date as follows:

NOTE: "Periodic Review" No change does not constitute a procedure or plan change.

a. One copy of any procedure change with signed original letter to:

Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

b. Two copies of any procedure change to NRC Region 1 office.

c. One copy of any procedure change to NRC Resident Inspector.

3.5 Control and Use of Emergency Preparedness Job Aids

3.5.1 The Director Emergency Preparedness or designee shall review, approve and authorize use of all emergency preparedness job aids.

3.5.2 Personnel shall develop job aids on a suitable medium and ensure:

- Handwritten or drawn aids are avoided to the extent practicable.
- The information presented on the job aid is clear, legible and useable.

(C1) • If the proposed job aid provides an information that should be incorporated into the permanent procedures, initiator will provide a completed Procedure Change Evaluation (PCE) and not the job aid request.

(C1) • Job aid is not intended to bypass or reflect requirements of procedure(s).

3.5.3 Personnel requesting a job aid shall initiate an Emergency Preparedness Job Aid Form (Attachment 4) by completing the Originating Information section and submitting it to the Director Emergency Preparedness.

3.5.4 The Director Emergency Preparedness or designee shall review the request for the job aid document. If the request is rejected, inform the originator. If not, perform the following:

(C1) NOTE: Verify that the Job Aid content does not bypass the normal plant procedure change process. If a procedure change is appropriate, request the originator to complete a PCE and reject the job aid.

- a. Document approval by signing and dating the form.
- b. Assign a sequence number to the form using the Job Aid Index Log (Attachment 5).
- c. Complete the necessary information in the EP Job Aid Index Log.

3.5.5 Generate and post the job aid.

- a. Job aids shall be marked with the assigned job aid number, effective date and a reference to the originating/source document including its revision number, if applicable. Expiration date, if assigned, shall be displayed in large letters, approximately same size as any other largest letter on the job aid.
- b. Ensure that job aids are placed in close proximity to where they will be used and in a protective cover or lamination.

3.5.6 Requests to remove a posted job aid shall be submitted to the Director Emergency Preparedness by any one in the initiator organization.

3.5.7 The Director Emergency Preparedness or designee shall review to approve the removal of posted job aids or can remove any job aids, if required, by signing and dating the Removal Authorization section of the EP Job Aid Form (Attachment 4) and updating the EP Job Aid Index Log (Attachment 5).

3.5.8 The Director Emergency Preparedness shall ensure that the annual recertification review of open job aids is performed. Review includes the following:

- a. Assessment of open job aids for continued use.
- b. Verification that open job aids are current in content.
- c. Letter to file (with a copy of EP Job Aid Index Log) listing by number the Job Aids which were reviewed.

3.6 Annual Training to Offsite Agencies

3.6.1 On an annual basis, training should be offered to the following offsite agencies:

- New York State Emergency Management Office
- New York State Department of Health
- Oswego County Emergency Management

3.6.2 This training shall include:

- Review of NMP Site Emergency Plan or implementing procedures
- Classification of Emergencies/Emergency Action Levels
- Reporting Requirements
- Assessment and Protective/Corrective Actions
- Communication Networks

4.0 DEFINITIONS

None

5.0 REFERENCES AND COMMITMENTS

5.1 Technical Specification

5.1.1 Unit 1 Technical Specifications Sections 6.5.2.8 and 6.5.3.8

5.1.2 Unit 2 Technical Specifications Sections 6.5.2.8 and 6.5.3.8

5.2 Licensee Documentation

Nine Mile Point Site Emergency Plan

5.3 Standards, Regulations and Codes

5.3.1 10 CFR 50.4

5.3.2 10 CFR 50.47

5.3.3 10 CFR 50.54t

5.3.4 10 CFR 50 Appendix E

5.3.5 FEMA-REP-15, Radiological Emergency Preparedness Exercise Evaluation Methodology

5.3.6 NUREG-0654/FEMA REP-1, Criteria for preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.

5.4 Policies, Programs and Procedures

- 5.4.1 NDD-EPP, Emergency Preparedness
- 5.4.2 NIP-EPP-01, Emergency Response Organization Expectations and Responsibility
- 5.4.3 NIP-RMG-01, Records Management
- 5.4.4 EPMP-EPP-02, Emergency Equipment Inventories and Checklists
- 5.4.5 EPMP-EPP-03, EDAMS Program Maintenance
- 5.4.6 EPMP-EPP-04, Emergency Exercise/Drill Procedure
- 5.4.7 EPMP-EPP-05, Emergency Preparedness Program Self Assessment
- 5.4.8 EPMP-EPP-06, Emergency Response Organizations Notification Maintenance and Surveillance
- 5.4.9 EPMP-EPP-08, Maintenance, Testing and Operation of the Oswego County Prompt Notification System

5.5 Commitments

<u>Sequence Number</u>	<u>Commitment Number</u>	<u>Description</u>
None	C1	DER C-98-0625: Proceduralize emergency medical services program maintenance and oversight functions.

6.0 RECORDS REVIEW AND DISPOSITION

6.1 The following records generated by this procedure shall be maintained by Records Management for the Permanent Plant file in accordance with NIP-RMG-01, Records Management.

- Drill, Exercise and Objectives Schedule
- Annual Emergency Preparedness Activities Schedule
- Annual Independent Emergency Preparedness Program Review
- Annual Emergency Plan Recertification Review Report
- 10 CFR 50.54(q) Effectiveness Review
- Any documentation generated as a result of Step 3.1.4 of this procedure

6.2 The following records generated by this procedure are not required for retention in the Permanent Plant File:

- Emergency Preparedness Job Aid Form
- EP Job Aid Index Log

LAST PAGE

ATTACHMENT 1: RECURRING EMERGENCY PREPAREDNESS ACTIVITIES

Recurring activities are individually numbered and coded as 'BW' for Bi-weekly, 'M' for monthly, 'Q' for quarterly, 'S' for semi-annual, 'A' for annual, 'B' for biennial, 'D' for following drills and/or exercise, 'AR' for As Required.

A. EP Program Items	Freq	Reference
1. Develop and issue a drill report describing the scenario conducted and observations per EPMP-EPP-04	D	EPMP-EPP-04
2. Verify telephone numbers contained in emergency procedures and revise as necessary per EPMP-EPP-02.	Q	NUREG-0654, P.10 EPMP-EPP-02
3. Ensure an independent review of the Emergency Preparedness Program is performed.	A	10 CFR 50.54(t) NUREG-0654, P.9
4. Perform a recertification review, and revision if necessary, of the Site Emergency Plan and document per EPMP-EPP-01	A	NUREG-0654, P.4 EPMP-EPP-01
5. Perform a review, and update if necessary, of the Site Emergency Plan letters of agreement and document per EPMP-EPP-01.	A	NUREG-0654, P.4 EPMP-EPP-01
6. Perform a recertification review, and revision if necessary, of the Emergency Plan Implementing Procedures and document per EPMP-EPP-01.	A	Site Emergency Plan EPMP-EPP-01
7. Review the Emergency Action Levels with the State and county governmental authorities and document per EPMP-EPP-01.	A	10 CFR 50, Appendix E, Section IV, B EPMP-EPP-01
8. Verify initial and annual requalification conducted for ERO personnel per NTP-TQS-202.	A	10 CFR 50, Appendix E, Section IV, F NUREG-0654, 0.5 NTP-TQS-202
9. Perform a recertification review of the Emergency Preparedness Job Aids.	A	EPMP-EPP-01
10. Perform a coordinated dissemination of information to the public within EPZ to include the following: a) "Emergency Planning and You" booklet b) Telephone advertisement c) Transient population poster d) Siren information sticker	A	10 CFR 50, Appendix E, Section IV, D.2. NUREG-0654, G.1
11. Verify performance of a familiarization of the media with the plans, radiation and points of contact for release of public information.	A	NUREG-0654, G.5
12. Verify satisfactory completion of all required audits per EPMP-EPP-02.	M;Q and A	EPMP-EPP-02
13. Perform a recertification review, and revision if necessary, of the Emergency Plan Maintenance Procedures and document per EPMP-EPP-01.	B	Site Emergency Plan EPMP-EPP-01
14. Develop/maintain six year drill, exercise and objective schedule.	A	EPMP-EPP-01
15. Develop an EP Activities Schedule.	A	EPMP-EPP-01

ATTACHMENT 1 (Cont)

B. Periodic Tests of Facilities and Equipment	Freq	Reference
1. Verify the conduct of the bi-weekly silent test of the siren system.	M	NUREG-0654, Appendix 3, Section C.3.h.(1) EPMP-EPP-08
2. Conduct a test of the communications with the State and County agencies within the plume EPZ per EPMP-EPP-02. (RECS test)	M	10 CFR 50, Appendix E Section IV.E.9.a NUREG-0654, N.2.a EPMP-EPP-02
3. Conduct a test of the communications from the CR, TSC, and EOF to the NRC (ENS and HPN) per EPMP-EPP-02. (ENS test)	M	10 CFR 50, Appendix E, Section IV.E.9.d NUREG-0654, F.1.f EPMP-EPP-02
4. Conduct a test of the ability to notify the ERO augmentation personnel by the activation of the pager system.	M	NUREG-0654, F.3 EPMP-EPP-06
5. Conduct an inspection, inventory and operability test of all emergency equipment and instruments per EPMP-EPP-02.	AR	NUREG-0654, H.10 EPMP-EPP-02
6. Verify the conduct a growl test of the siren system (performance is also required whenever maintenance has been performed) per EPMP-EPP-08.	Q	NUREG-0654, Appendix 3, Section C.3.h.(1) EPMP-EPP-08
7. Verify the conduct of a test of the Unit 1 and Unit 2 ERDS surveillance.	Q	10 CFR 50, Appendix E, Section VI.1.
8. Conduct a test of the communications between the CR, TSC and EOF per EPMP-EPP-02. (Dedicated Telephone test)	A	10 CFR 50, Appendix E Section IV.E.9.c. EPMP-EPP-02
9. Conduct a test of the communications with the State and County EOCs and the Field Monitoring Teams from the EOF per EPMP-EPP-02. (RECS and Radio/Radio Console test)	A	10 CFR 50, Appendix E, Section IV.E.9.c. EPMP-EPP-02
10. Conduct a test of the communications with Federal EROs per EPMP-EPP-02. (ENS Test)	A	10 CFR 50, Appendix E, Section IV.E.9.b. EPMP-EPP-02
11. Verify the conduct of an "all-blow" test of the siren system per EPMP-EPP-08.	A	NUREG-0654, Appendix 3, Section C.3.h.(1) EPMP-EPP-08
12. Verify collection/evaluations of emergency preparedness TLDs	Q	SEP 7.3.3.b.2 S-ENVSP-4.5 NUREG 0654 II.I.

ATTACHMENT 1 (Cont)

C. Miscellaneous Activities/Tasks

1. Perform CAN surveillance and testing: <ul style="list-style-type: none"> • Perform CAN Test • Perform CAN Surveillance for Initial Responders • Send group rosters to responsible owners. 	Q	EPMP-EPP-06
2. Complete activities associated with Step 3.3.4 of this procedure.	A	Tech Spec 6.5.2.8
3. Distribute prompt notification system monthly summary to New York State (including year-to-date siren availability) per EPMP-EPP-08	M	EPMP-EPP-08 SEP section 6
4. Distribute copy of annual QA/SRAB audit to State and County.	A	NUREG-0654, P.9
5. Review all KI tablet supplies for expiration per EPMP-EPP-02.	A	SEP section 6 EPMP-EPP-02
6. Verify completion of drill requirements via completion of required objectives, drills and reports.	A	EPMP-EPP-01 EPMP-EPP-04
7. Update drill/exercise compliance matrix following each drill per EPMP-EPP-04	D	EPMP-EPP-04
8. Provide annual training for State and County	A	10CFR50 Appendix E, Section F
9. Perform surveillance of Tone Alert Radio distribution	A	EPMP-EPP-08
10. Verify completion of TSC Ventilation Test (S-IPM-TSC-001)	Q	NUREG 0696
11. Perform self assessment activities in accordance with EPMP-EPP-05	AR	EPMP-EPP-05
12. Perform distribution of updates of SEP and EPIP to NRC	M	10CFR 50.4 EPMP-EPP-01
13. Perform EDAMS surveillance in accordance with EPMP-EPP-03	A	EPMP-EPP-03
14. Generate ERO Qualification List and: <ul style="list-style-type: none"> • Generate list of delinquent personnel • Generate a list of personnel who will become delinquent before the next list is generated • Distribute the above to each emergency facility • Distribute the above to personnel in accordance with NIP-EPP-01 	Q	NIP-EPP-01

ATTACHMENT 1 (Cont)

C. Miscellaneous Activities/Tasks (Cont)

15. Review PPF materials stored in temporary location for transfer to permanent location.	A	NIP-RMG-01
16. Update Site and Emergency Telephone Directory	Q	None
17. Conduct surveillance of the content and frequency of training provided by Oswego County.	A	10CFR50 Appendix E Section F
18. Verify conduct of New York State dial-up system surveillance.	Q	None
19. Schedule the following activities: <ul style="list-style-type: none"> • MS-1 training and drill dates for Oswego and University Hospitals • RP Familiarization and Plant Access training for offsite fire departments. • MS-1 training for Oswego Fire Department 	A	10CFR50 Appendix E Section F
20. Service copiers and fax machines in TSC, OSC and JNC	A	None
21. Solicit changes to the following documents: <ul style="list-style-type: none"> • New York State Public Health Law Article 30 and 30A • New York State CPR Title 10 Part 800 • New York State Basic Life Support protocols • Central NY Basic EMT protocols. IF needed, generate changes to NTP-TQS-402 and EPMP-EPP-02.	A	None Commitment C1

ATTACHMENT 2: PERIODIC REQUIREMENTS FOR DRILLS AND EXERCISES

Reoccurring drills and exercises are individually numbered and coded as 'M' for monthly, 'Q' for quarterly, 'S' for semi-annual, 'A' for annual, 'B' for biennial, and 'C' for once in a cycle (every 6 years). 'AR' for As Required.

Periodic Drills and Exercises	Freq	Reference
1. Conduct a Health Physics (HP) drill involving response, monitoring, sampling and analysis activities.	S	NUREG-0654, N.2.e.(1)
2. Conduct a communications drill with the State and County EOCs and the Field Monitoring Teams from the EOF.	A	NUREG-0654, N.2.a EPMP-EPP-02
3. Conduct a medical emergency drill involving a simulated contaminated individual which contains provisions for participation by local support services agencies.	A	NUREG-0654, N.2.c
4. Conduct an environmental radiological monitoring drill involving onsite and offsite activities.	A	NUREG-0654, N.2.d
5. Conduct a Health Physics drill involving the analysis of liquid samples using PASS.	A	NUREG-0654, N.2.e.(2)
6. Conduct an exercise of the NMPC Emergency Plan. Provide the opportunity for offsite authorities to participate in each exercise.	B	10 CFR 50, Appendix E, Section IV, F.2 & F.3.(f)
7. Conduct an exercise which involves a simulated release which would require a response by offsite authorities. Provide an opportunity for offsite authorities to fully participate in the exercise. At least partial participation is required of offsite authorities in every offsite exercise.	B	10 CFR 50, Appendix E, Section IV, F.3 NUREG-0654, N.1.a
8. Commence an exercise between 1800-0600.	C	NUREG-0654, N.1.b
9. Conduct exercises in various weather conditions (during different seasons).	C	NUREG-0654, N.1.b
10. Conduct an unannounced exercise (the knowledge of the exact date of the exercise is restricted to only non-players with a need to know).	AR	NUREG-0654, N.1.b FEMA GM, R1-TH-88-19
11. Conduct an Ingestion Pathway exercise. Provide the opportunity for the States to participate in the Ingestion Pathway exercise.	AR	10 CFR 50, Appendix E Section IV, F.3.(e)
12. Conduct an exercise which allows all State and local governments to fully participate together.	AR	10 CFR 50, Appendix E Section IV, F.3.(c)

ATTACHMENT 3: 10CFR50.54(Q) EVALUATION AND EFFECTIVENESS REVIEW

Document Title: _____

Document Number: _____ Revision: _____

Preliminary Evaluation:

Does the proposed procedure/procedure change impact or alter:

- | <u>Yes</u> | <u>No</u> | <u>Item</u> |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | The assignment of responsibilities to either principal or supporting organizations or the ability to respond initially or on a continuous basis. |
| <input type="checkbox"/> | <input type="checkbox"/> | The staffing and/or responsibilities of on-shift personnel or initial activation and long term staffing of emergency response facilities. |
| <input type="checkbox"/> | <input type="checkbox"/> | The interface between onsite and offsite support response activities. |
| <input type="checkbox"/> | <input type="checkbox"/> | Arrangements for requesting and effectively using assistance or resources from offsite authorities or the accommodations for Federal, State, and/or Local staff at the Emergency Operations Facility. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Emergency Action Levels. |
| <input type="checkbox"/> | <input type="checkbox"/> | * The periodicity of communications and emergency equipment tests. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Notification process to the station Emergency Response Organization or the Local, State, or Federal entities. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Content of initial and follow-up messages. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Communications capability among principal response organizations to emergency personnel or the public. |
| <input type="checkbox"/> | <input type="checkbox"/> | Dissemination of coordinated information to the general or transient public including periodic information dissemination (brochures). |
| <input type="checkbox"/> | <input type="checkbox"/> | Emergency facilities and support equipment, used in emergency response, provisions, or maintenance. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Methods, systems and/or equipment for the assessment and monitoring of actual or potential offsite radiological consequences. |
| <input type="checkbox"/> | <input type="checkbox"/> | * Protective Actions developed for either the Plume or Ingestion Exposure Pathways including onsite protective actions. |

* Indicates a "risk significant" planning standard.

ATTACHMENT 3 (Cont)

- Means for controlling emergency worker radiation exposures consistent with the guidelines established by the EPA.
- Arrangements for medical services for contaminated injured individuals.
- Plans for plant reentry and/or recovery organization operations.
- Periodicity of drills and/or exercises as well deficiency resolution.
- Training requirements for Emergency Response Organization or local site support personnel.
- Responsibilities for development, maintenance or review of the Plan as well as training requirements for personnel maintaining the Plan.
- Implementation of Federal regulations and requirements or Formal Emergency Preparedness commitments.

Assessment of Impact:

If any of the items of the preliminary evaluation are checked "Yes", then an effectiveness review analysis against the specific elements of 10 CFR 50.47(b), 10 CFR 50 Appendix E, other applicable regulations, requirements or commitments is required.

Documentation of the effectiveness review analysis and justification should be developed and attached to this form as follows:

Background and Scope Provides a description of the reason for and scope of the change.

Program Requirements A description of the regulation or commitment criteria, related to each change, for which the Emergency Preparedness Program must demonstrate compliance. This includes nonregulated elements described by the currently effective Emergency Plan.

Change Assessment A discussion of how each change degrades, does not affect or enhances the effectiveness and abilities of the Emergency Preparedness Program as it relates to the program requirements.

Justification A formal justification which describes reason the change is appropriate and necessary.

Change Matrix If practical, a comparison table showing both old and new wording, including step or section number references is developed. Changes which involve the incorporation of previously unaddressed elements shall mark the old wording as 'Not Applicable'. Changes with involve the deletion of an element shall mark the new wording as 'Removed from Document'.

ATTACHMENT 3 (Cont)

References Provides a list of references described in the analysis such as regulation numbers, guidance documents, information notices, inspection reports or other sources which contain criteria incorporated by the Emergency Plan.

Conclusion State the conclusion (decrease/no decrease in effectiveness) of the analysis.

Statement of Conclusion:

Does the change maintain the equivalent or establish an improved capability:

- | <u>Yes</u> | <u>No</u> | <u>N/A</u> | |
|--------------------------|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | To respond to an emergency or meet actions or other requirements described in the Emergency Plan. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | In protecting the health and safety of plant personnel and the general public in the event of an emergency. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | In implementation of a Federal regulation or requirement or formal commitment. |

Based on this evaluation the proposed change (Circle One) **DOES / DOES NOT** decrease the effectiveness of the Emergency Plan.

The Plan, as changed, (Circle One) **CONTINUES / DOES NOT CONTINUE** to meet the standards of 10 CFR 50.47(b), the requirements 10 CFR 50 Appendix E, and all other applicable regulations, requirements, and commitments.

Disposition:

Application shall be made and approval obtained from the NRC for proposed changes that decrease the effectiveness of the Plan prior to implementation.

Evaluator (print/initial): _____ Date _____

Concurrence - EP (print/initial): _____ Date _____

ATTACHMENT 4: EMERGENCY PREPAREDNESS JOB AID FORM

(To be assigned by EP) Job Aid Number: _____

Originating Information

Name(Print): Last, First Signature	Branch/Dept:	Date:
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TEL. EXT# _____ BEEP.# _____

Intended Use and Justification:
(Attach sample Job Aid)

PCE # _____ If procedure change required. Attach a copy.

Reference Source Document including Revision Number:

Affected Position(s):

Method and Location of Posting:

Approval Authorization

Signature:	Expiry Date if assigned.	Date:
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Removal Authorization

Signature:	Date:
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