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November 5, 1999
BW990076

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555 - 0001

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

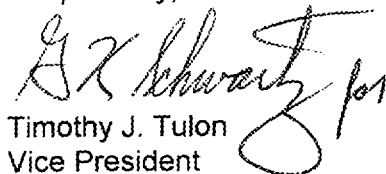
Subject: Submittal of Changes to Emergency Plan Implementing Procedures

In accordance with 10 CFR 50, Appendix E, Section V, "Implementing Procedures", we are reporting to the NRC several changes to the Braidwood Station Emergency Plan Implementing Procedures (i.e., BwZPs). These changes were made on October 5, 1999. This submittal is required to be submitted within 30 days. Therefore, this submittal is due by November 5, 1999. The changes to these procedures do not decrease the effectiveness of the Braidwood Emergency Plan and continue to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E.

Attachment 1, "Summary of Changes", contains a brief summary of the changes made to each of the BwZPs. Attachment 2, "Implementing Procedures", contains the revised BwZPs. Changes are indicated in the attached procedures by revision bars.

If you have any questions about this letter, please contact Mr. T. W. Simpkin (815) 458-2801, extension 2980.

Respectfully,

A handwritten signature in black ink, appearing to read "T. J. Tulon for", is written over the typed name and title of Timothy J. Tulon.

Timothy J. Tulon
Vice President
Braidwood Nuclear Station

TJT/DC/dah

Attachments: Attachment 1 – Summary of Changes
Attachment 2 – Implementing Procedures

cc: Regional Administrator – NRC Region III (two copies)
NRC Senior Resident Inspector – Braidwood Station

A045

Attachment 1

Summary of Changes

1. BwZP 1000-2, "Offsite Notifications"

A prerequisite section was added to clarify when a Nuclear Accident Reporting System (NARS) should be issued. In addition, for easier operator reference, a computer point (i.e. Y4012) was added to step F.1.a.9.

2. BwZP 2000-14, "Environs Director Implementing Procedure", and 2000-14A1, "Environs Director Implementing Procedure Checklist"

Since field teams now have a dedicated second van for their use, reference to the procedure describing the process for obtaining keys for the use of the Admin van and other backup vehicles from other departments was deleted.

3. BwZP 2000-14A2, "Station Vehicles for Field Team Use"

This procedure described the process for obtaining keys for the use of the Admin van other backup vehicles from other departments. Since the field teams now have a dedicated second van for their use, this procedure was deleted.

Attachment 2
Implementing Procedures

OFFSITE NOTIFICATIONS

A. PURPOSE

This procedure provides direction for completing the Nuclear Accident Reporting System (NARS) form and activating the Emergency Response Data System (ERDS).

B. REFERENCES

1. Generating Station Emergency Plan
2. 10CFR50.72 (6)
3. BwZP 200-1, "Braidwood Emergency Action Levels".
4. BwZP 1000-1, "Emergency Director Implementing Procedure".
5. BwZP 1000-3, "GSEP Protection Action Guidelines".

C. PREREQUISITES

1. A NARS will be issued when:
 - a. A classification is made,
 - b. The classification changes,
 - c. A change in radioactive release condition,
 - d. A change in the downwind sector when a release is potential or occurring,
 - e. A change is made in Protective Action Recommendations,
 - f. Additional information is available which may affect a change in the State or local protective action response.
2. NARS forms must be approved by the Emergency Director prior to transmission.

- F. 3. In the event that all commercial phone service is lost, access to microwave tie-lines may be accomplished by performing the following steps:
- a. Dial 7809 (wait for a dial tone).
 - b. Dial 4321 for the Customer Call Center (Oakbrook).
 - c. IDENTIFY yourself and the nature of the call.
 - d. REQUEST the Customer Service Representative (CSR) to transfer your call to their Supervisor. The Supervisor will authorize the use of the outside lines available to the CSRs.

D. PRECAUTIONS

In agreement with the State of Illinois, a "release occurring" should be marked on the NARS form when the total station release rate is greater than or equal to $4.15E+4 \mu\text{Ci}/\text{sec}$ (one-half the unusual event threshold value) or an unmonitored release is in progress. A "Potential Release" should be marked on the NARS form when the criteria for EAL FS1 is met.

E. LIMITATIONS AND ACTIONS

1. Offsite authorities on the NARS network must be notified and notification begin within 15 minutes upon the classification of a GSEP condition. The time clock starts when an emergency is declared. The clock will stop after the initial Roll-Call is made and the NARS information starts to be given in block 1.
2. In those cases when there is no actual or expected release, and no motive force exists for a release, then it is not necessary to relay wind shift data to the States via the NARS Form.
3. In those cases when there is a release occurring or there is a potential for release, wind direction should be checked approximately every 15 minutes. If the wind direction changes such that a new downwind sector is identified, a new NARS Form is required.
4. Should meteorological data measurements become unavailable contact Dresden or LaSalle Station as alternative meteorological data sources. If met data is unavailable from other ComEd towers, data from either the meteorological consultant or National Weather Service may be used. The phone numbers are listed in the ERF Telephone Directory.
5. ERDS must be activated as soon as possible within one hour of the declaration of an Alert or higher emergency classification level.
6. Classification, and in particular the classification time recorded on the NARS form, starts the time clocks for notification of the States (15 minutes), notification of the NRC (immediately after state notification and within one hour) and staffing the TSC, OSC and EOF(30 minutes normal working hours, 60 minutes off hours), in accordance with the Generating Station Emergency Plan, Section 4.2.

F. PROCEDURE

1. NARS

a. Complete the form as follows:

- 1) Utility Message Number - Number each NARS message sequentially for the event.
- 2) State Message Number - ENTER N/A if this is a utility message. ENTER the number of the STATE message if this is a confirmation call from IEMA.
- 3) Section 1 - Status - Mark the letter corresponding to the appropriate status description.
- 4) Section 2 - Station - Mark [F] Braidwood.

NOTE

Mark [F] Not Applicable, when the event has terminated.

- 5) Section 3 - Onsite Accident Classification - Mark the letter corresponding to the appropriate accident classification. Accident classification is a responsibility of the Emergency Director and may not be delegated.
- 6) Section 4 - Accident Classified - Record the time and date the current emergency classification was determined. Also, enter the On-Site Emergency Action Level (EAL) code. Enter N/A if this is an accident termination message.

Accident Terminated - Record the time and date of the accident termination. Enter N/A if this is an accident classified message.
- 7) Section 5 - Release to Environment - Mark the letter corresponding to the appropriate release status. For radioactive gases, "potential" should be marked when EAL FS1 criteria are met, and "occurring" should be marked when the total station release rate is greater than or equal to $4.15E+4 \mu\text{Ci}/\text{sec}$, or an unmonitored release is in progress.
- 8) Section 6 - Type of Release - Mark the letter corresponding to the appropriate type of release.

- F. 1. a. 9) Section 7 - Wind Direction - Enter the direction from which the wind is blowing, in degrees. Enter the letter corresponding to the downwind sector using environmental sampling maps or the back of the NARS form. Use Control Room indicator or point ID "AM004/Y4012" 34 ft. wind direction instrumentation.
- 10) Section 8 - Wind Speed - Enter the wind speed in either meters/second or miles/hour. Use Control Room indicator or point ID "AM001/Y4011" 34 ft. wind speed instrumentation.
- 11) Section 9 - Recommended Actions - Mark the letter corresponding to the appropriate action recommendation. Refer to BwZP 1000-3. Boxes [L-P] are for State use only. Protective Action Recommendations are the responsibility of the Emergency Director and may not be delegated. Enter downwind sector and each adjacent sector in 9.C when recommending shelter or evacuation.
- 12) Section 10 - Additional Information - should only be used to explain why a NARS is being issued when not for a change in classification. The initial classification provides the EAL under which the classification is made and needs no Additional Information. A change in classification needs no Additional Information.

Additional Information should be included when:

- An equal or lesser classification is made on the other unit,
- There is a change in the release condition,
- A wind shift which results in additional downwind sectors,
- A change is made in PARs,
- Corrections to the current NARS are made.

Otherwise, Block 10. should contain the word "none".

- 13) Approved By - The Emergency Director shall initial and record the time of approval.
- b. Take an initial roll call marking the appropriate boxes in the top left corner of the form.
- c. If IEMA, IDNS or EO do not answer the roll call, make contact via commercial phone numbers listed and transmit the NARS form information.
- d. Record the time and date the message was initiated.

- F. 1. e. Verbally transmit the NARS form information. The phonetic alphabet should be used when relaying section information.
 - f. Section 11 - Message Transmitted By - Fill in name, organization (ComEd) and outside line telephone number of the person transmitting the NARS Form information.
 - g. Section 12 - Message Transmitted - Record the date and time the message was initiated by the person listed in Section 11.
 - h. Section 13 - Message Received By - Record the name and organization (IEMA) of the person receiving the NARS message.
 - i. Perform a completion roll call marking the appropriate boxes.
 - j. IEMA should call the Station back on the outside phone number provided in Section 11 to verify the information that was recorded is correct.
 - k. IEMA then calls back on the NARS phone and transmits the message, station personnel shall record the NARS information from IEMA on another NARS Form since this is the official means of documenting State actions.
2. State updates are required at the Alert declaration or higher. These updates are required at the top of the second hour following the declaration. The state updates are the responsibility of the EOF. Personnel responsible for making the state updates are as follows:

EOF - Manager of Emergency Operations per CEPIP 2200-01
EOF - Environmental Emergency Coordinator per CEPIP 2221-01

The Station Director/Assistant Station Director should verify that the required state updates are being made by the EOF.

If the EOF cannot complete this task the responsibility reverts back to the TSC.

F. 3. ERDS

- a. The Emergency Response Data System (ERDS) provides the NRC with plant data at their Operations Center. ERDS shall be activated as soon as possible within one hour of the declaration of an ALERT or higher emergency classification level.
- b. ERDS Activation does NOT relieve emergency personnel from staffing the red ENS phone with the NRC during an emergency.
- c. The ERDS program shall run for as long as there is an Alert or higher emergency classification, or until the NRC verbally requests program termination.
- d. To activate ERDS:
 - 1) Using a terminal with access to the GSEP program group, double click on the ERDS icon.
 - 2) Select "Braidwood" and click on "OK".

NOTE

When typed, the password does not show on the screen.

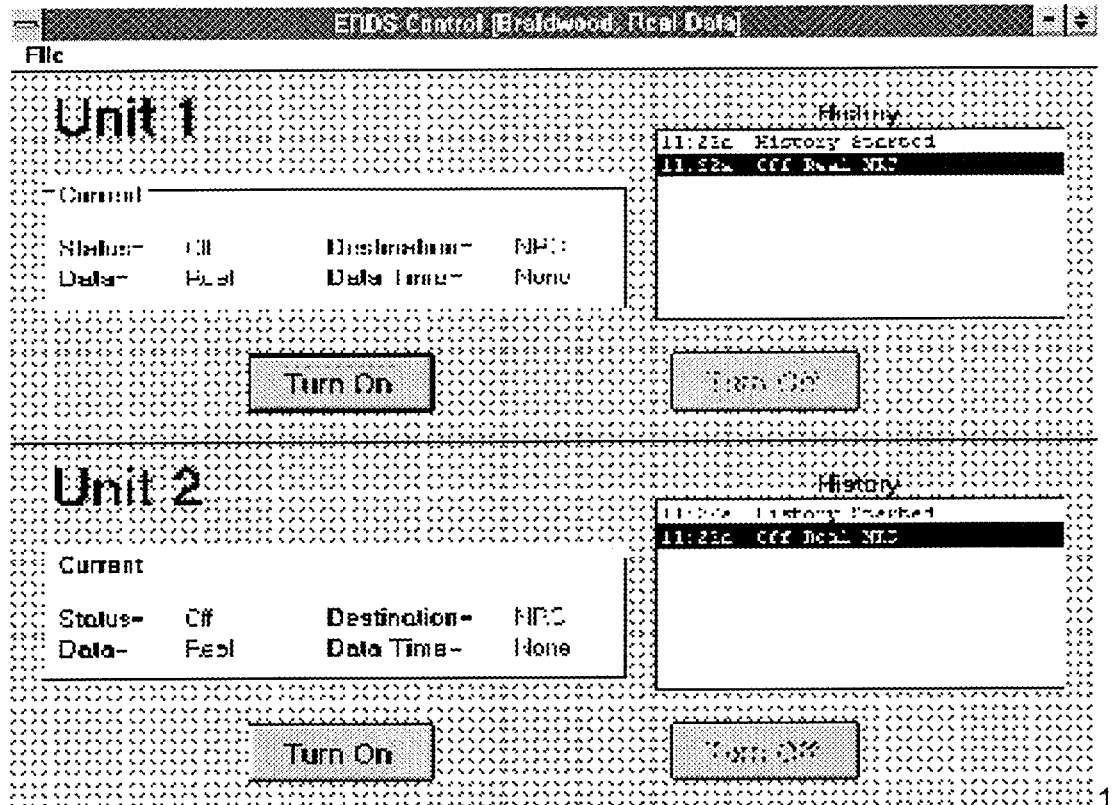
- 3) Enter the password SCOUT and click on "OK".
- 4) The next screen contains the ERDS Main Screen. Click on "Turn on" for the desired unit.

NOTE

The status represents the data transmission state of the ERDS server for that unit. This status can be any of the following:

- Off - no data being transmitted
- Starting - unit is attempting to connect
- On - data is being transmitted
- Stopping - unit is attempting to disconnect
- Restarting - unit is attempting to reconnect after a break

Sample: Main Screen



- F. 3. d. 5) Once ERDS is activated, you may exit the program by clicking on File, then clicking on Exit. Data transmission will not be affected.
- e. To terminate ERDS data transmission, the same steps are followed, as delineated above, clicking "Turn off" for the unit(s) transmitting data.
- f. Problems with ERDS activation and operation should be brought to the attention of the computer staff in the TSC upon their arrival.

G. APPENDICES

None

ENVIRONS DIRECTOR IMPLEMENTING PROCEDURE

A. PURPOSE

This procedure outlines the methods used to implement the duties of Environs Director under emergency conditions.

B. REFERENCES

1. Generating Station Emergency Plan (GSEP).
2. GSEP Environs Group Emergency Plan Implementing Procedures.
3. GSEP Dose Assessment Model Procedures.
4. BwZP 1000-3, GSEP Protective Action Guidelines.
5. BwZP 1000-4, Technical Support Center Implementing Procedure.
6. BwZP 2000-15, ODCS Specialist Implementing Procedure.
7. BwZP 2000-19, Communicator/Recorder Implementing Procedure.

C. PREREQUISITES

None.

D. PRECAUTIONS

1. Personnel performing radiation surveys will require dosimetry such as TLDs and Electronic dosimeters to ascertain their accumulated radiation exposure.
2. Keys to the GSEP Vans are maintained in the OSC. A spare set is kept in the Radiation Protection office.

E. LIMITATIONS AND ACTIONS

1. At the discretion of the Emergency Director, the Environs Group may be activated during emergency conditions involving a hazardous material, including radioactive material, accident suspected of affecting areas outside of the plant facility.
2. If radiation levels at the site boundary are significantly elevated, initial emphasis will be placed upon determination of offsite radiation levels and identification of areas requiring controlled access and/or evacuation.
3. Initiation of environmental sampling activities and direction of the Environs Group will be performed by the Radiation Protection Director until the Environs Director arrives at the Technical Support Center (TSC) and assumes these responsibilities.
4. The Environs Director reports to the Technical Support Center (TSC) unless otherwise directed by the Emergency Director or Radiation Protection Director.
5. The Environs Director Supervises the activities of the ODCS Specialist in the Technical Support Center (TSC).

F. PROCEDURE

1. ESTABLISH two environs teams for initiating surveys of areas outside the station which are experiencing or are threatened by a radioactive material accident. REFER to the Environs Group Emergency Plan Implementing Procedure (CEPIPs) for appropriate sampling and survey techniques.
2. DISPATCH teams so that they approach a suspected plume or release point from the upwind direction while continuously monitoring radiological conditions. Minimal equipment for these personnel should include air samplers and dose rate measuring instruments. Personnel shall be equipped with all appropriate radiation protection equipment, including dosimeters, protective clothing and respiratory equipment.
3. COORDINATE with the Security Director to expedite the field teams exit from the protected area in an assembly.
4. ASSIGN the ODCS Specialist the responsibility to obtain current meteorological data and perform dose calculations and/or projections. REFER to the Dose Assessment Procedures for appropriate instructions. PROVIDE preliminary Protective Action Recommendations to the Radiation Protection Director, based on computer outputs and the guidance found in BwZP 1000-3.
5. ESTABLISH communications with the EOF environmental group as appropriate. When the EOF has assumed command of the event, field teams may be directed by the EOF Environs Director.
6. ASSIGN the ODCS Specialist the responsibility to maintain the status board of meteorological conditions and forecasted conditions.
7. MAINTAIN a record of all Environs Director GSEP activities. Included in the log are the contents of periodic updates to the field teams of weather, plant conditions and recommended protective actions.
8. REFER to the Environs Director Checklist provided in BwZP 2000-14A1.

G. APPENDICES

1. BwZP 2000-14A1, Environs Director Checklist.

ENVIRONS DIRECTOR CHECKLIST

This checklist is provided solely for the convenience of the Environs Director. It is not necessary to follow this checklist step-by-step. Its completion is not required and its use is determined by the Environs Director.

1. IF field teams are not required, ASSIST the Radiation Protection Director.
2. ASSIGN the ODCS Specialist the responsibility to obtain current meteorology and forecasted meteorology. Using plant parameters and environmental data, ASSIGN the ODCS Specialist to perform dose calculations/projections.
3. IDENTIFY the environs teams and name team leaders:

Team #1: _____
 Leader

Team #2: _____
 Leader
4. OUTLINE the plan for monitoring the environment. REFER to the Environs Group Emergency Plan Implementing Procedures as appropriate. DOCUMENT the proposed plan in the Environs Director GSEP Log, as determined appropriate.
5. Use of the GSEP Radio Console in the TSC:
 - a. AFTER turning on the GSEP Radio Console, PUSH the "PL" Reset Button. It activates the private line, and only other GSEP radios can be monitored.
 - b. In the UNSCRAMBLED MODE, prior to beginning of use, every 15 minutes while in use and upon signing off - STATE your location and call letters: "This is Braidwood Station KJG 385."

6. CONDUCT a briefing with each field team. Briefings should contain but not be limited to:
 - a. Establish a time check - field teams should adjust their watches so that they operate on "TSC time".
 - b. Current GSEP classification and plant status - field teams should be aware of current conditions and potential degradation.
 - c. Current weather - noting especially the affected sectors and the potential for wind shift. Also note any precipitation in or approaching the area which may influence monitoring activities.
 - d. Current release status - note the need for any protective clothing requirements at the onset. Provide guidance on when to put on clothing.
 - e. Radiological Precautions - assign personnel exposure limits; ensure personnel put on the additional dosimetry in the environs kits. Ensure teams will radio in when encountering dose rates of 100 mrem/hour.
 - f. As necessary, assign a Potassium Iodine (KI) vial to each environs team from the supply stored in the OSC. Ensure Radiation Protection Director and Emergency Director concurrence prior to issuance.
 - g. Note any other concerns or problems.
 - h. Verify environs teams understand the briefing.
 - i. Conduct a radio check - handi-talkies used by environs teams should be set in the scrambled mode (circle with the line through it). If the team briefing is done via the GSEP radios this is a sufficient check of the system.
 - j. Assign each team to a vehicle.
 - k. Briefing information should be documented in the Environs Director GSEP Log.
7. Upon completion of the environ teams inventories, ASSIGN initial destinations to the field teams. RECORD the information on the Environmental Assessment Logs for each team.
8. NOTIFY the Radiation Protection Director and Emergency Director when the teams are operational in the field.

9. PROVIDE periodic updates to the field team. Updates may include:

- a. Change of GSEP classification.
- b. Change of release status.
- c. Change of meteorology, especially wind shift.

RECORD time and content of briefing in the Environs Director GSEP Log.

10. When the EOF Environs Director is prepared to assume responsibility for the field teams:

- a. PROVIDE the EOF Environs Director with an update of plant status and environs teams operation and information
- b. DISCUSS the options available for long term operations

11. NOTIFY the EOF Environs Director, the field teams, the Radiation Protection Director and Station Director of the exact moment of the turnover of responsibility to the EOF.

12. Throughout the event, ASSIGN the ODCS Specialist the responsibility to maintain a status board of current meteorology and forecasted conditions. At a minimum, status boards should be updated every 30 minutes with current weather conditions.

13. In a rapidly developing event, field teams may be dispatched in conjunction with an assembly. COORDINATE with the Security Director to expedite egress of the field teams in an assembly.

14. REVIEW all dose projections and make preliminary protective action recommendations based on the guidance found in BwZP 1000-3. RECORD the Protective Action Recommendation on the dose projection output; INITIAL, DATE and PASS to the Radiation Protection Director.

15. MAINTAIN a log of all Environs Director GSEP activities.