

Indian Point 3
Nuclear Power Plant
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Mr. Fred R. Dacimo
Plant Manager

July 27, 2000
IPN-00-057

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

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
**Objectives for the November 15, 2000 Emergency
Preparedness Full Participation Exercise**

Dear Sir:

In accordance with 10 CFR 50.47 and 10 CFR 50, Appendix E the Authority plans to exercise its emergency plan by conducting a full participation emergency preparedness exercise on November 15, 2000. This submittal is provided for NRC review. Attachment I describes the purpose, scope and objectives for the Indian Point 3 Full Participation Emergency Preparedness Exercise. Attachment II contains Tables I and II that correlate the NUREG-0654 elements to be exercised to the objectives.

The Authority intends to test the site response to a simulated emergency condition at Indian Point 3. Full participation by New York State and the surrounding counties is anticipated.

There are no new commitments made by the Authority with this letter.

Should you or your staff have any questions, please contact Mary Ann Wilson, Site Emergency Planning Coordinator, at (914) 736-8404.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Fred Dacimo'.

Fred Dacimo
Plant Manager
Indian Point 3 Nuclear Power Plant

Attachments
cc: See next page

IE35

cc: Mr. Hubert J. Miller
Regional Administrator
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U.S. Nuclear Regulatory Commission
Resident Inspectors' Office
Indian Point 3 Nuclear Power Plant

INDIAN POINT 3 (IP3) NUCLEAR POWER PLANT
2000 FULL PARTICIPATION EXERCISE
November 15, 2000

PURPOSE / SCOPE / OBJECTIVES

A. PURPOSE

The purpose of this Exercise is to demonstrate the ability of the IP3 Emergency Response Organization (ERO) to respond to a simulated emergency at IP3. It is designed to demonstrate the capabilities of the Emergency Response Facilities including the use of the Emergency Response Plan and Procedures. It is also an opportunity for Emergency Response Organization personnel to receive practical training in their specific emergency response responsibilities.

B. SCOPE

The scenario is designed to activate and implement the IP3 Emergency Plan and Procedures through various emergency action levels. Although the scenario accurately simulates operating events, it is not intended to be used to assess the operators' diagnostic capabilities but rather provides sequences which ultimately demonstrate the operators' ability to respond to events which result in exercising emergency plans and procedures. Free play is encouraged and the controllers will intercede only if operator/player action prematurely terminates the exercise or excessively deviates from the scenario time line.

The scenario is developed and reviewed by a committee consisting of representatives from many disciplines including Emergency Planning, Operations, Training, Public Affairs, Security, Maintenance, Instrumentation and Control and Radiological Engineering. The scenario is also run on the IP3 control room simulator to develop data and verify sequences and expected responses.

The Exercise will be conducted during normal work hours and will last approximately seven (7) hours.

Since this is a Full Participation Exercise, participation by Orange, Putnam, Rockland, and Westchester counties as well as New York State will be demonstrated. Support is anticipated from Consolidated Edison Indian Point 2 for offsite survey teams. The New York Power Authority will activate the following Emergency Response Facilities: Control Room (Simulator), Operations Support Center, Technical Support Center, Emergency Operations Facility and Joint News Center.

At no time will the Exercise be permitted to interfere with the safe operation of IP3. To ensure that this goal is met, plant management may suspend the exercise, or any part of it, for any period of time should a plant safety issue arise.

C. **OBJECTIVES**

The major elements that are to be included in every exercise are incorporated into the objectives for this exercise. In addition, six (6) of the elements that should be exercised over a six (6) year period are included in the objectives and are as follows:

1. Activation of the Joint News Center (JNC)
2. Rumor Control
3. Use of licensee's headquarters support personnel
4. Capability for determining the magnitude of release and impact of the particular components of the release
5. Assembly and accountability (evacuation of onsite personnel will be simulated)
6. Recovery and Re-entry

The following objectives shall be demonstrated. They were used to develop the exercise scenario and will provide a framework for drill observers to evaluate exercise performance.

Emergency Response Facilities:

a. **Control Room (CR) (Simulator)**

1. Facility Management and Control - The shift manager will coordinate and oversee control room response. If there is a turnover to the Plant Operations Manager (POM), the facility management and control will be the responsibility of the POM. This will also include the use of appropriate procedures.
2. Analysis of Plant Conditions and Corrective Actions - Control Room staff will correctly interpret control room instrument displays and have the ability to recognize when events are progressing abnormally.
3. Detection and Classification of Emergency Events - Control Room staff will classify an emergency using emergency action levels (EALs) on the basis of plant conditions.
4. Onsite Notifications and Communications - Control Room staff will notify onsite personnel, by using the plant page, of the following:
 - emergency condition,
 - emergency classification, and
 - plant updates approximately every 30 minutes

Control Room staff will communicate with each other and the other facilities, and be briefed on plant conditions.

5. Offsite Notifications and Communications - The control room staff will notify State/Counties using normal methods, the RECS (Radiological Emergency Communications System) line. The use of back-up methods will be demonstrated only if the normal method fails to operate. The initial notification will be made within 15 minutes of the emergency declaration and will include the New York State (NYS) Radiological Data Form Part I information. The control room staff will notify the Institute for Nuclear Power Operations (INPO), the NRC, and appropriate contracted insurance companies using normal methods.
6. Implementation of Onsite Protective Actions - The control room staff will initiate and consider onsite protective actions until the Emergency Operations Facility (EOF) is activated, as required (e.g., accountability, potassium iodide (KI) issuance, evacuation of non-essential personnel, exposure authorization, etc.).

Note: This objective may not be demonstrated.

7. Dose Assessment - Personnel will use approved procedures for dose assessment including meteorological information.

b. **Technical Support Center (TSC)**

1. Staffing and Activation of the TSC - The TSC will be staffed within 60 minutes of the Alert or higher classification. Provisions for 24 hours of continuous operation of the site emergency response organization will be made through the use of a two (2) shift roster.
2. Facility Management and Control - The TSC Manager (TSCM) will coordinate and oversee technical support activities. This will also include the use of appropriate procedures.
3. Accident Assessment - Personnel activating the TSC will adequately and accurately perform the following tasks:
 - initially assess and continuously reassess reactor conditions and,
 - maintain an overview of the reactor and plant conditions using the expertise of technical staff and information provided to them
4. Communications - TSC staff will communicate with each other and other facilities, and will be briefed on plant conditions.
5. Assistance and Support to the CR - The TSCM will oversee the analysis and corrective action response. Performance of other functions should not interfere with direction or determination of corrective action. Corrective actions will be implemented in an effective and timely manner.

c. **Emergency Operations Facility (EOF):**

1. **Staffing and Activation of the EOF** - The EOF will be staffed within 60 minutes of the Alert or higher classification. Provisions for 24 hours of continuous operation of the site emergency response organization will be made through the use of a two (2) shift roster.
2. **Facility Management and Control** - The Emergency Director (ED) will oversee all activities performed at the EOF. This will also include the use of appropriate procedures. The ED will coordinate all onsite and offsite NYPA emergency procedures.
3. **Accident Assessment and Classification** - Personnel activating the EOF will adequately and accurately perform the following tasks:
 - use EALs, as appropriate, to confirm or reclassify an emergency, and
 - maintain an overview of the reactor and plant conditions using the expertise of the staff and the information provided
4. **Offsite Dose Assessment** - If a release is anticipated or is in progress, the appropriate EOF staff will correctly assess and integrate information from the reactor systems' status and trends, radiological monitoring, source term assumptions, and meteorological information (current and forecast) to define the magnitude and location of the offsite impact.
5. **Offsite Monitoring** - If a release is anticipated or in progress, offsite monitoring teams will be deployed following vehicle equipment check and a briefing. Teams will be dispatched to appropriate locations to intercept the plume and take samples (radiation measurements - gamma and beta readings and air samples). The results of monitoring will be used to redefine the source term and projected doses.
6. **Protective Action Decision Making** - The appropriate EOF staff will assess the status of the reactor core, reactor systems and containment to recommend onsite and offsite protective actions. The following will be considered in determining what protective actions are appropriate:
 - current reactor and plant status,
 - prognosis of the accident,
 - expected magnitude and duration of the release, and
 - current and projected weather conditions
7. **Onsite Notifications and Communications** - The EOF personnel will communicate with each other, with the other facilities, and be briefed on plant conditions.

8. Offsite Notifications and Communications - Upon turnover from the CR, the EOF will commence notifications to the State/Counties using normal methods, the RECS line. The use of back-up methods will be demonstrated only if the normal method fails to operate. The initial notification will be made within 15 minutes of the emergency declaration and will include NYS Radiological Data Form Part I information. The EOF staff will notify INPO, the NRC and the appropriate contracted insurance companies using normal methods. If the Control Room has already contacted INPO and the appropriate contracted insurance companies, then this action will not be demonstrated.
9. Implementation of Protective Actions - The appropriate EOF staff will confirm and periodically assess the habitability of the EOF, as required. The appropriate EOF staff will initiate and consider onsite protective actions, as required (e.g., accountability, KI, evacuation of non-essential personnel, emergency exposure authorizations, etc.).

d. **Operations Support Center (OSC):**

1. Staffing and Activation of the OSC - The OSC will be staffed within 60 minutes of the Alert or higher classification. Provisions for 24 hours of continuous operation of the site emergency response organization will be made through the use of a two (2) shift roster.
2. Facility Management and Control - The OSC Manager (OSCM) will coordinate and oversee operations support activities. The OSCM will ensure the use of procedures.
3. Repair and Corrective Actions - Personnel performing specific repair and corrective actions will be assigned in a timely manner and with clear instructions. Teams dispatched from the OSC will be briefed, tracked and debriefed. Procedure adherence is required unless authorization to deviate is specifically provided.
4. Communications - OSC staff will communicate with each other and the other facilities, and will be briefed on plant conditions. Communications with the teams dispatched from the OSC will be maintained.
5. Implementation of Protective Actions - Appropriate OSC staff will ensure habitability of the TSC and OSC.

e. **Offsite Monitoring:**

1. **Activation and Deployment** - Vehicles will be available and readily accessible to transport the teams. Calibrated instrumentation and equipment will be available for monitoring and for taking samples. Instrumentation to detect radioiodine at levels as low as 10^{-7} microCi/cc under field conditions will be available. Teams will be equipped with a communication system. They will be briefed on plant, radiological, and meteorological conditions prior to dispatch and periodically updated.
2. **Surveys, Sampling and Analysis** - Teams will be able to locate sampling/monitoring points. Teams will be knowledgeable in collecting and marking samples, and in reading monitoring results in accordance with approved procedures. Teams will keep track of their radiological exposures. Monitoring results will be promptly and correctly reported back to the EOF.

f. **Security and Accountability:**

1. **Security** - Access control will be maintained at the site and will not interfere with the response to an emergency. Security practices and procedures will not impede movement and access of site operating and response personnel to plant areas during an emergency situation.
2. **Accountability** - Conduct of protected area accountability will be achieved within 30 minutes of the declaration of a Site Area Emergency or a General Emergency.

g. **Joint News Center (JNC):**

1. Information disseminated to the media/press by the licensee will be accurate and timely. News releases and briefing notes will be properly coordinated with the ED.
2. Communication equipment will be available. Licensee personnel giving briefings will be technically qualified and able to answer media questions accurately and in a timely manner.
3. Coordinated arrangements for dealing with rumors will be demonstrated.

h. **Recovery/Re-Entry:**

1. Recovery Center will provide general support to the Site through the use of headquarters' support personnel.
2. Headquarters Recovery Manager will conduct recovery and re-entry discussions with the Site Emergency Director.

3. Recovery discussions will include:

- request for PASS (Post Accident Sampling System) sample
- environmental sampling collection schedule

i. **Critique:**

1. At the end of the exercise, each facility will hold a critique with the controller and players. A formal critique will follow that evaluates the overall performance of the drill. The controllers/observers will identify areas of strengths and weaknesses.

Exercise and Drills:

This exercise incorporates the following drills:

1. Communication Drill - The IP3 staff will notify and communicate with state, and local governments, and field assessment teams.
2. Health Physics/Radiological Monitoring Drill - The health physics staff will respond to and conduct analysis of simulated, elevated radiation measurements.

Table I - NRC Required Elements to be Exercised Each Year

<u>Objectives</u>	<u>NUREG-0654 Items</u>	<u>Exercise Objectives Paragraphs Addressing Items</u>
1. Accident detection and assessment	I.1 ³ , I.2	a.2, b.3, c.3
2. Emergency Classifications	D.1, D.2	a.3, c.3
3. Notification of onsite and offsite emergency responders	E.1, E.2, E.3, J.1	a.4, a.5, c.7, c.8
4. Communications	F.1 ¹ , F.2 ² , E.2, E.4, H.6, 8.1 ¹ , 8.2 ¹ , 8.3 ¹ , 8.4 ¹	a.4 (E.2, F.1.e), a.5 (F.1.b,c,f), b.4 (F.1.d), c.7 (F.1.d), c.8 (E.4, F.1.b,c,d,f), d.4 (F.1.d), e.1 (F.1.d, H.6)
5. Radiological exposure control	J.3, J.6, K.1 ² , K.2, K.3, K.5 ¹ , K.6	a.6 (J.3, K.1.b,c, K.2) c.3 (K.3) c.9 (J.3, J.6.c, K.1.b,c, K.2, K.6)
6. Protective action recommendations	J.7	c.6
7. Staff augmentation and Shift Staffing	A.1 ¹ , A.3 ¹ , A.4, B.1 ¹ , B.2 ¹ , B.3 ¹ , B.4 ¹ B.5 ¹ , B.6 ¹ , B.7 ¹ , B.8 ¹ , B.9 ¹ , Table B-1 ¹	a.1 (A.1.d), b.1 (A.4), b.2 (A.1.b), c.1 (A.4), c.2 (A.1.d), d.1 (A.4), d.2 (A.1.b)

¹ Indicates that all or part of this requirement is met programmatically, and therefore, it is not specifically addressed by an exercise objective.

² Indicates that all or part of this requirement is met by performing medical exercises, and therefore, it is not covered by this exercise.

³ Indicates that all or part of this requirement is met by performing Post Accident Sampling System exercises, therefore, it is not covered by this exercise.

Table II - NRC Required Elements to be Exercised Over a Period of Six Years which are Addressed in this Drill

Objectives	<u>NUREG-0654 Items</u>	<u>Exercise Objectives Paragraphs Addressing Items</u>
1. Activation of the Joint News Center/Rumor Control	G.3, G.4.a,b,c	g
2. Use of licensee's headquarters support personnel	O.4.i	h
3. Capability for determining the magnitude and impact of the particular components of a release	I.3, I.4, I.6, I.8, I.9, I.10	c.4 (I.3, I.6) c.6 (I.4, I.10) c.5 (I.8), e.1 (I.9)
4. Assembly and accountability (including the simulated evacuation of onsite personnel)	J.5	g.2
5. Recovery and Re-entry	M.1	h