



444 South 16th Street Mall
Omaha NE 68102-2247

October 26, 2001
LIC-01-0108

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

Reference: Docket No. 50-285

**SUBJECT: Transmittal of Changes to Radiological Emergency Response Plan (RERP)
and the Emergency Plan Implementing Procedures (EPIP)**

In accordance with 10 CFR 50.54(q), 10 CFR 50, Appendix E, Section V, and 10 CFR 50.4(b)(5), please find RERP and EPIP change packages enclosed for the Document Control Desk (holder of Copy 165) and the NRC Emergency Response Coordinator (holder of Copies 154 and 155).

The document update instructions and summary of changes are included on the Confirmation of Transmittal (Form EP-1) form attached to each controlled copy change package. Please return the Confirmation of Transmittal forms by December 10, 2001.

The revised documents included in the enclosed package are:

EPIP Index Page 1 of 2 issued 10/11/01
EPIP-EOF-7 R13b issued 10/31/00
RERP Index Page 1 of 2 issued 10/11/01
RERP-Section P R10a issued 10/23/97

If you have any questions regarding the enclosed changes, please contact Carl Simmons at (402) 533-6430.

Sincerely,

S. K. Gambhir
Division Manager
Nuclear Operations

SKG/ash

A045

David [signature]
4171

Enclosures

- c: T. H. Andrews, Emergency Response Coordinator (2 sets)
Alan Wang, NRC Project Manager (w/o enclosures)
W. C. Walker, NRC Senior Resident Inspector (w/o enclosures)
Winston & Strawn (w/o enclosures)

OMAHA PUBLIC POWER DISTRICT

Confirmation of Transmittal for
Emergency Planning Documents/Information

- ☒ Radiological Emergency Response Plan (RERP) ☒ Emergency Plan Implementing Procedures (EPIP) ☐ Emergency Planning Forms (EPF)
- ☐ Emergency Planning Department Manual (EPDM) ☐ Other Emergency Planning Document(s)/Information

Transmitted to:

Name: Document Control Desk Copy No: 165
Tom Andrews Copy No: 154
Tom Andrews Copy No: 155

Date: _____

The following document(s) / information is forwarded for your manual:

REMOVE SECTION

EPIP Index page 1 of 2 issued 09/04/01
EPIP-EOF-7 R13 issued 10/31/00
RERP Index page 1 of 2 issued 09/13/01
RERP-Section P R10 issued 10/23/97

INSERT SECTION

EPIP Index page 1 of 2 issued 10/11/01
EPIP-EOF-7 R13b issued 10/31/00
RERP Index page 1 of 2 issued 10/11/01
RERP-Section P R10a issued 10/23/97

Summary of Changes:

EPIP-EOF-7 was revised to correct a typo in the note that follows step 5.4.
RERP-Section P was revised to correct the position titles in steps 1.5 and 2.3.



Supervisor - Emergency Planning

I hereby acknowledge receipt of the above documents/information and have included them in my assigned manuals.

Signature: _____

Date: _____

Please sign above and return by 12/10/01 to:

Karma Boone
Fort Calhoun Station, FC-2-1
Omaha Public Power District
444 South 16th Street Mall
Omaha, NE 68102-2247

NOTE: If the document(s)/information contained in this transmittal is no longer requested or needed by the recipient, or has been transferred to another individuals, please fill out the information below.

☐ Document(s)/Information No Longer Requested/Needed

☐ Document(s)/Information Transferred to:

Name: _____

Mailing Address: _____

EMERGENCY PLAN IMPLEMENTING PROCEDURE INDEX

EPIP-OSC-1	Emergency Classification	R34 09-14-00
EPIP-OSC-2	Command and Control Position Actions/Notifications	R39 05-17-01
EPIP-OSC-9	Emergency Team Briefings	R7 12-09-99
EPIP-OSC-15	Communicator Actions	R22 10-24-00
EPIP-OSC-21	Activation of the Operations Support Center	R10 08-24-01
EPIP-TSC-1	Activation of the Technical Support Center	R21 08-24-00a
EPIP-TSC-2	Catastrophic Flooding Preparations DELETED (05-09-95) REINSTATED	(R0 03-22-95) R2 02-06-96
EPIP-TSC-8	Core Damage Assessment	R14 01-19-01
EPIP-EOF-1	Activation of the Emergency Operations Facility	R12 08-24-00a
EPIP-EOF-3	Offsite Monitoring	R16 10-26-99
EPIP-EOF-6	Dose Assessment	R31 07-02-01a
EPIP-EOF-7	Protective Action Guidelines	R13 10-31-00b
EPIP-EOF-10	Warehouse Personnel Decontamination Station Operation	R10 01-13-00
EPIP-EOF-11	Dosimetry Records, Exposure Extensions and Habitability	R18 09-18-97b
EPIP-EOF-19	Recovery Actions	R7 09-30-98
EPIP-EOF-21	Potassium Iodide Issuance	R4 11-07-00
EPIP-EOF-23	Emergency Response Message System	R5 10-12-99
EPIP-EOF-24	EOF Backup Alert Notification System Activation	R3 09-09-99
EPIP-RR-11	Technical Support Center Director Actions	R14 02-29-00
EPIP-RR-13	Reactor Safety Coordinator Actions	R14 12-09-99

Fort Calhoun Station
Unit No. 1

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EPIP-EOF-7

EMERGENCY PLAN IMPLEMENTING PROCEDURE

Title: PROTECTIVE ACTION GUIDELINES

FC-68 Number: EC 25249

Reason for Change: Revise format per Writer's Guide. Change Attachment 6.2 to agree with P.M. PET Basis Document.

Requestor: Mark Reller

Preparer: Mark Reller

Correction (a): Voided
Correction (b): Page 2 (10-11-01)

PROTECTIVE ACTION GUIDELINES

1. PURPOSE

- 1.1 This procedure outlines the guidelines for determining Protective Action Recommendations (PARs).

2. REFERENCES/COMMITMENT DOCUMENTS

- 2.1 "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents", EPA 400-R-92-001, May 1992
- 2.2 "Response Technical Manual" NUREG/BR-0150, USNRC, Volume 1, Rev. 4, March 1996
- 2.3 "Protective Measures Basis Document", CHP-00-038, September 28, 2000

3. DEFINITIONS

None

4. PREREQUISITES

- 4.1 An emergency has been declared per EPIP-OSC-1.

5. PROCEDURE

NOTE: When an Emergency Notification Form (FC-1188) is issued a Protective Action Recommendation (PAR) must be made. A PAR is considered developed when the FC-1188 is signed.

NOTE: For a Notification of Unusual Event (NOUE) or Alert the PAR is typically "None".

NOTE: At a General Emergency the minimum PAR is the evacuation of a 2 mile radius (all sectors) around the plant (Sub Areas 1 and 10).

NOTE: Do not delay required notifications while awaiting dose assessment projections or field team results.

- 5.1 Using Attachments 6.1 and 6.2, determine the appropriate PAR.

- 5.2 Record PAR(s) on Emergency Notification Form (FC-1188).

5.3 PAR Preparation and Review

5.3.1 In the Control Room

- A. Operations personnel normally prepare PAR(s) based on plant conditions.
- B. The dose assessment position normally prepares PAR(s) based on radiological conditions.

5.3.2 In the Technical Support Center (TSC)

- A. The Operations Liaison Group or the Site Director normally prepares PAR(s) based on plant conditions.
- B. The TSC Protective Measures Coordinator normally prepares PAR(s) based on radiological conditions.

5.3.3 In the Emergency Operation Facility (EOF)

- A. The Protective Measures Manager's Group normally prepares PAR(s), with assistance from the Operations Liaison Group.
- B. The Protective Measures Manager normally reviews PAR(s).

5.4 The Command and Control Position must approve all PAR(s).

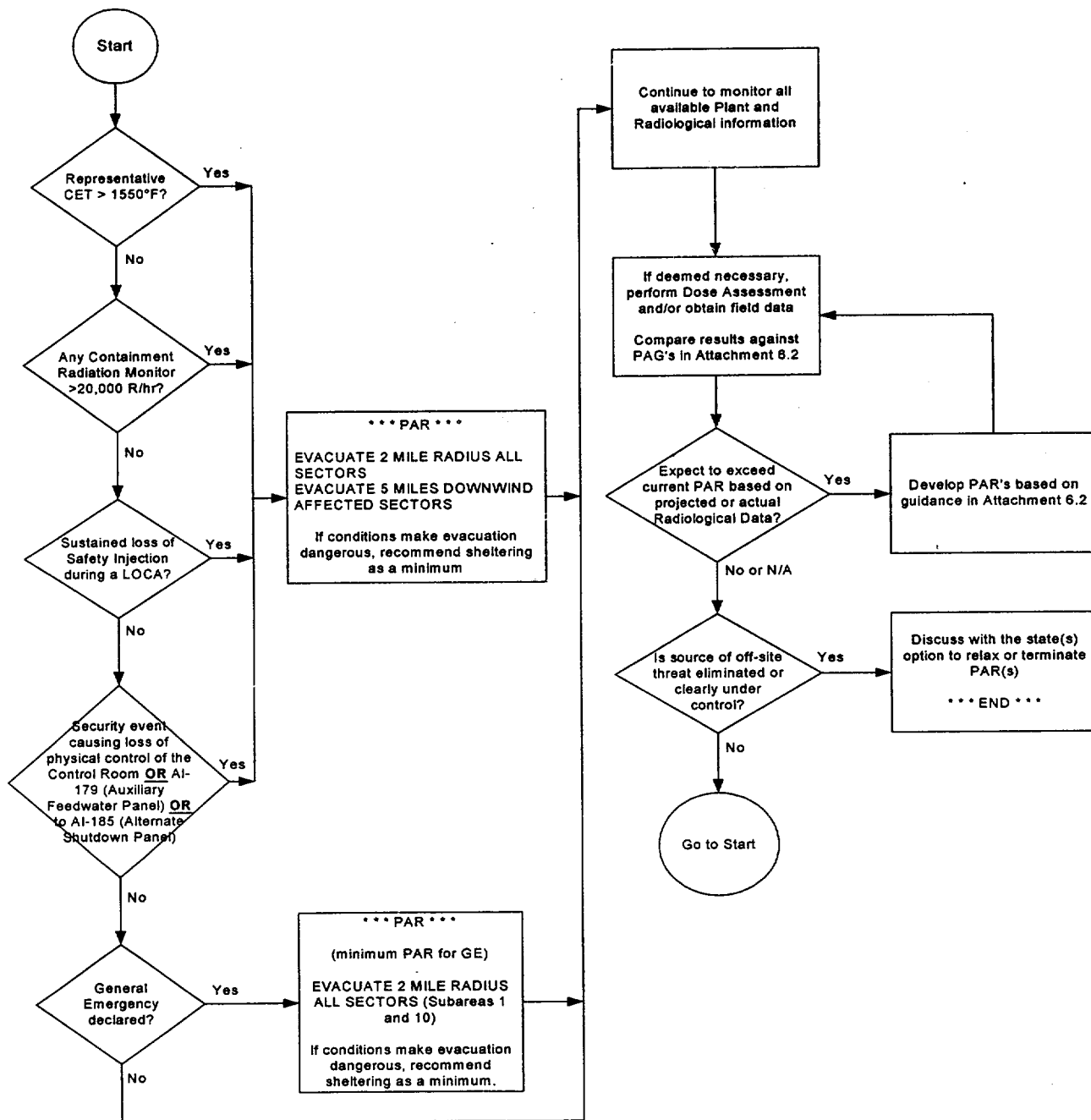
NOTE: State and county officials are responsible for the final decision on what Protective Actions are issued to the public.

5.5 Transmit the PARs to the state and counties per EPIP-OSC-2 and EPIP-OSC-15.

6. ATTACHMENTS

- 6.1 Protective Action Recommendations Flowchart Based on Plant Conditions and Radiological Data
- 6.2 Protective Action Recommendations Based on Dose Assessment/Field Team Radiological Data

Attachment 6.1 - Protective Action Recommendations Flowchart
Based on Plant Conditions and Radiological Data



Attachment 6.2 - Protective Action Recommendations Based on
Dose Assessment/Field Team Radiological Data

Early Phase (Plume Phase):

Projected Dose	Protective Action Recommendation (PAR)
<1 rem TEDE <5 rem CDE (thyroid)	None (NO PAR REQUIRED) and continue to monitor radiological conditions
≥1 rem TEDE ≥5 rem CDE (thyroid)	Evacuate Shelter, if it will provide protection equal to or greater than evacuation up to 10 rem (NOTE)
≥50 rem SDE (skin)	Evacuate

NOTE: Sheltering may be preferable to evacuation as a protective action in some situations. Because of the higher risk associated with evacuation of some special groups in the population (e.g. those who are not readily mobile), sheltering may be the preferred alternative for such groups as a protective action at projected doses up to 5 rem TEDE. In addition, under unusually hazardous environmental conditions, use of sheltering up to 5 rem TEDE to the general population (and up to 10 rem to special groups) may be justified.

For example, situations when evacuation may not be appropriate at 1 rem TEDE include: (1) the presence of severe weather; (2) competing disasters; (3) institutionalized people who are not readily mobile; and (4) local physical factors which impede evacuation.

RADIOLOGICAL EMERGENCY RESPONSE PLAN INDEX
RERP

RERP	Definitions and Abbreviations	R15 06-29-00a
RERP-SECTION A	Assignment of Organizational Responsibility (Organizational Control)	R11 02-27-97c
RERP-SECTION B	Organizational Control of Emergencies	R25 08-24-00
RERP-SECTION C	Emergency Response Support and Resources	R9 09-30-98
RERP-SECTION D	Emergency Classification System	R9 04-29-97a
RERP-SECTION E	Notification Methods and Procedures	R23 08-24-00
RERP-SECTION F	Emergency Communications	R15 08-24-00
RERP-SECTION G	Public Education and Information	R10 03-11-97a
RERP-SECTION H	Emergency Facilities and Equipment	R29 08-24-00
RERP-SECTION I	Accident Assessment	R11 09-02-99a
RERP-SECTION J	Protective Response	R16 01-06-00a
RERP-SECTION K	Radiological Exposure Control	R9 02-03-00
RERP-SECTION L	Medical and Public Health Support	R11 01-27-00
RERP-SECTION M	Recovery and ReEntry Planning and Post Accident Operations	R14 03-11-97a
RERP-SECTION N	Exercises and Drills	R12 10-28-99
RERP-SECTION O	Radiological Emergency Response Training	R13 09-23-97a
RERP-SECTION P	Responsibility for the Planning Effort: Development, Periodic Review and Distribution	R10 10-23-97a
RERP-APPENDIX A	Letters of Agreement	R16 03-07-00b
RERP-APPENDIX B	Supporting Emergency Plans	R4 10-27-98
RERP-APPENDIX C	NUREG/RERP/Implementing Procedure Cross Reference List	R12 09-02-99b

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RERP-SECTION P

RADIOLOGICAL EMERGENCY RESPONSE PLAN

Title: RESPONSIBILITY FOR THE PLANNING EFFORT: DEVELOPMENT,
PERIODIC REVIEW AND DISTRIBUTION

FC-68 Number: 50538

Reason for Change: Revise Section 1.0 to reflect that EP has taken over ERO training and the change of responsibilities. Revise Section 2.0 to include updating of emergency telephone numbers. Delete Section 4.0. Put in procedure format.

Contact Person: B. Fried

Correction (a): Pages 1 and 2 (10-11-01)

RESPONSIBILITY FOR THE PLANNING EFFORT:
DEVELOPMENT, PERIODIC REVIEW AND DISTRIBUTION

1. Responsibility for Radiological Emergency Response Planning

- 1.1 The Manager-Fort Calhoun Station/Nuclear Division Managers are responsible for the implementation of actions required to periodically exercise the Radiological Emergency Response Plan (RERP) and the Emergency Plan Implementing Procedures (EPIP'S) and for maintaining an effective Emergency Response Organization (ERO) staff.
- 1.2 The Plant Review Committee is responsible for the review and approval of revisions to the RERP and the EPIP used for emergency classification in accordance with SO-G-30, Procedure Changes and Generation.
- 1.3 The Manager-Fort Calhoun Station is responsible for the final approval of RERP and the EPIP used for emergency classification, and for maintaining an effective emergency response capability at Fort Calhoun Station.
- 1.4 Nuclear Organization Responsible Management Contacts are responsible for selecting and proposing personnel to fill ERO positions and for ensuring support of the Radiological Emergency Response Plan.
- 1.5 The Manager-Security/Emergency Planning is responsible for the development, administration and maintenance of the RERP, EIPs, Emergency Planning Department Manual (EPDM), Emergency Planning Tests (EPT), review and approval of all EPIP changes (with the exception of the EPIP used for emergency classification), planner training, the overall development and implementation of the FCS ERO Training and Qualification Program and coordination of off-site emergency preparedness activities in the states of Iowa and Nebraska.
- 1.6 The Manager-Training is responsible for the independent review and approval of the FCS ERO Training and Qualification Program.
- 1.7 The Emergency Planning Department is responsible for the preparation of all revisions to the RERP and EIPs and for coordinating the review processes necessary prior to the implementation of the revisions.

2. Maintenance of the RERP and EIPs

- 2.1 Emergency Planning personnel shall review the RERP and EIPs annually. Any changes found to be necessary as a result of the review shall be submitted using the established procedure change process.

- 2.2 Comments and recommendations made as a result of drills/exercises may require procedure changes to be initiated. These processes are detailed in the EPDM.
- 2.3 EPTs ensure that copies of the annual review and annual audit reports are reviewed by the Supervisor-EP and any changes incorporated as necessary.
- 2.4 Changes to the plan will be submitted to the NRC within 30 days in accordance with 10CFR50.54(q). The Radiological Emergency Response Plan and approved changes to the plan will also be forwarded to appropriate organizations and individuals with responsibility for implementation of the plan. A new edition of the Radiological Emergency Response Plan will be issued when major technical and significant philosophical changes are required.
- 2.5 All emergency telephone numbers are updated quarterly.

3. Audits

- 3.1 The Quality Assurance and Quality Control Department will coordinate an independent audit of the emergency preparedness program annually. The audit shall include the Radiological Emergency Response Plan, implementing procedures and practices, training, readiness testing, equipment, and interfaces with state and local governments. The results of this audit shall be documented and distributed as specified in Emergency Planning Test No. 17. Copies of pertinent sections of the audit will be forwarded to appropriate state and local governments. This audit shall fulfill the requirements of 10CFR50.54(t). The results of this audit shall be retained for a minimum of five (5) years.