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PROCEDURE NUMBER: EI-2.1
TITLE: SITE EMERGENCY DIRECTOR

TRANSMITTAL: LISTED BELOW ARE NEW/REVISED PROCEDURES WHICH MUST BE IMMEDIATELY INSERTED INTO OR DISCARDED FROM YOUR PROCEDURE MANUAL.

Action Required	Section or Description
REMOVE AND DESTROY	EI-2.1, R/22, ENTIRE PROCEDURE
REPLACE WITH	EI-2.1, R/23, ENTIRE PROCEDURE

SIGN, DATE, AND RETURN THE ACKNOWLEDGEMENT FORM WITHIN 10 DAYS TO THE PALISADES PLANT DOCUMENT CONTROL.


SIGNATURE OR INITIALS

DATE

A045

PALISADES NUCLEAR PLANT
EMERGENCY IMPLEMENTING PROCEDURE

TITLE: SITE EMERGENCY DIRECTOR

 12/5/01
Procedure Sponsor Date

DWRogers 10/24/01
Technical Reviewer Date

DGMalone 10/31/01
User Reviewer Date

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ATTACHMENTS

Attachment 1, "Authorization to Exceed Dose Control and 10CFR20 Dose Limits"
Attachment 2, "Turnover of Command and Control During an Emergency"
Attachment 3, "Considerations for Turnover of SED Responsibilities"

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USER ALERT
INFORMATION USE PROCEDURE

The activities covered by this procedure may
be performed from memory.

1.0 PERSONNEL RESPONSIBILITIES

The Site Emergency Director (SED) shall implement this procedure.

2.0 PURPOSE

To define the SED responsibilities in an emergency.

3.0 REFERENCES

3.1 SOURCE DOCUMENTS

- 3.1.1 Environmental Protection Agency Manual of Protective Action Guides and Protective Actions for Nuclear Incidents, May 1992

3.2 REFERENCE DOCUMENTS

- 3.2.1 Emergency Implementing Procedure EI-1, "Emergency Classification and Actions"
- 3.2.2 Emergency Implementing Procedure EI-4.1, "Technical Support Center Activation"
- 3.2.3 Emergency Implementing Procedure EI-5, "Reentry"
- 3.2.4 Emergency Implementing Procedure EI-6.13, "Protective Action Recommendations for Offsite Populations"
- 3.2.5 Emergency Implementing Procedure EI-8, "Onsite Radiological Monitoring"
- 3.2.6 Emergency Implementing Procedure EI-9, "Offsite Radiological Monitoring"
- 3.2.7 Emergency Implementing Procedure EI-12.3, "Search and Rescue Team Responsibilities"

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- 3.2.8 Emergency Implementing Procedure EI-13, "Evacuation/Reassembly"
- 3.2.9 10CFR20
- 3.2.10 Severe Accident Management Guidelines
- 3.2.11 Palisades Administrative Procedure 10.46, "Plant Records"

4.0 INITIAL CONDITIONS AND/OR REQUIREMENTS

This procedure should be used each time the Site Emergency Plan is activated:

5.0 TURNOVER OF COMMAND AND CONTROL

**USER ALERT
INFORMATION USE PROCEDURE**

The activities covered by this procedure may
be performed from memory.

- 5.1 The Shift Supervisor shall turn over command and control of the emergency as soon as possible above an Unusual Event. Turnover may occur before this time at the option of the Shift Supervisor or potential SED.
- 5.1.1 Attachment 3 to this procedure provides a checklist of items that should be considered during the turnover process.
- 5.2 At a minimum, turnover of command and control shall include assumption of responsibility for emergency classification, protective action recommendations, dose assessment, and notifications to offsite authorities. Attachment 2 of this procedure provides a flowchart of turnover of command and control during an emergency.
- 5.3 Turnover of command and control from the SED to the Emergency Operations Facility (EOF) Director shall occur as soon as the EOF has resources available to assume responsibility for emergency classification, protective action recommendations, dose assessment, and offsite notifications.

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6.0 RESPONSIBILITIES

NOTE: An asterisk (*) indicates a responsibility that shall not be delegated.

- *6.1 Declare the appropriate classification for the incident and ensure that actions listed in Attachment 1 of Emergency Implementing Procedure EI-1, "Emergency Classification and Actions," are performed.

- 6.2 Direct the Technical Support Center per Emergency Implementing Procedure EI-4.1, "Technical Support Center Activation."

- *6.3 Approve recommendations to local or state agencies regarding protective actions for the public. Refer to Emergency Implementing Procedure EI-6.13, "Protective Action Recommendations for Offsite Populations." Declaration of a General Emergency classification and the associated Protective Action Recommendation shall be provided personally by the SED/EOF Director (Attachment 2) to the State Director if the State EOC is activated.

- *6.4 Approve decisions regarding site evacuation. Refer to Emergency Implementing Procedure EI-13, "Evacuation/Reassembly."

- 6.5 Request federal assistance, as necessary.

- 6.6 Ensure PA announcements regarding emergency conditions are made at regular intervals or when significant changes occur.

- 6.7 Ensure that search and rescue is performed for personnel missing following accountability. Refer to Emergency Implementing Procedure, EI-12.3, "Search and Rescue Team Responsibilities."

- 6.8 Authorize Potassium Iodine (KI) distribution per Emergency Implementing Procedure EI-8, "Onsite Radiological Monitoring," and Emergency Implementing Procedure EI-9, "Offsite Radiological Monitoring."

- 6.9 Consider and then approve implementation of Severe Accident Guideline recommendations of the Operations Support Group.

- 6.10 Direct the reentry phase of emergency response per Emergency Implementing Procedure EI-5, "Reentry."

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- *6.11 Approve establishment of Dose Control Levels >2.0 rem, but <5.0 rem using Attachment 1.

The SED may also provide verbal approval to prevent/mitigate damage to vital equipment when such activities are of immediate nature. In this instance, Attachment 1 shall be completed as soon as practical.

Completed Attachment 1 should be forwarded to the OSC Health Physics Supervisor.

- *6.12 Authorize exceeding the 10CFR20 dose limits for emergency workers. Table 2-1 below should be used to establish emergency worker dose limits.

Table 2-1

Guidance on Dose Limits for Workers Performing Emergency Services

Dose Limit ^a (rem)	Activity	Condition
5	all	
10	protecting valuable property	lower dose not practicable
25	lifesaving ^b or protection of large populations	lower dose not practicable
>25	lifesaving ^b or protection of large populations	only on a <u>voluntary</u> basis to persons fully aware of the risks involved (see Attachment 1, Tables 2-2 and 2-3)

- ^a: Sum of external effective dose equivalent and committed effective dose equivalent to nonpregnant adults from exposure and intake during an emergency situation. Workers performing services during emergencies should limit dose to the lens of the eye to three times the listed value, and doses to any other organ (including skin and body extremities) to ten times the listed value.
- ^b: For immediate life saving, Health Physics qualified personnel (ie, Health Physics Technician, or Health Physics Supervisor) may make the decision to exceed 10CFR20 dose limits if prior notification is made to the OSC Health Physics Supervisor.

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7.0 ATTACHMENTS AND RECORDS

7.1 ATTACHMENTS

7.1.1 Attachment 1, "Authorization to Exceed Dose Control and 10CFR20 Dose Limits"

7.1.2 Attachment 2, "Turnover of Command and Control During an Emergency"

7.1.3 Attachment 3, "Considerations for Turnover of SED Responsibilities"

7.2 RECORDS

Records generated by this procedure shall be filed in accordance with Palisades Administrative Procedure 10.46, "Plant Records." Refer to the record matrix attached to Admin 10.46 for information needed to complete Record Indexing Form (Form 104).

Record Title	Record Number	Retention Period
Attachment 1, "Authorization to Exceed Dose Control and 10CFR20 Dose Limits"	104-1	5 years
Attachment 2, "Turnover of Command and Control During an Emergency"	104-2	5 years
Attachment 3, "Considerations for Turnover of SED Responsibilities"	104-3	5 years
Records generated by this procedure	104-4	5 years

AUTHORIZATION TO EXCEED DOSE CONTROL AND 10CFR20 DOSE LIMITS

1. SED permission granted to establish dose control level > 2.0 rem, but < 5.0 rem for all radiation workers (unless individuals are identified in the justification section below).

_____ rem Dose Control Level (TEDE)

Justification: _____

Approved: _____ / _____
Site Emergency Director Date/Time

Return To Normal: _____ / _____
Site Emergency Director Date/Time

1. Team assignment requiring permission to exceed 10CFR20 dose limit is: ()

Search/Rescue _____ Equipment Maintenance _____ Other _____

2. SED permission requested to exceed 10CFR20 dose limits:

_____ > 5 rem, not to exceed 10 rem TEDE
_____ > 10 rem, not to exceed 25 rem TEDE
_____ > 25 rem TEDE

Justification: _____

3. Personnel Involved: Acknowledgment by team members that they have been briefed, understand the briefing and their new dose limits, and if briefed to exceed 25 rem, they are voluntary members of the team.

Name	SS#	Current Dose	Remaining Dose	Signature	Date/ Time
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

Approved: _____ / _____
Site Emergency Director Date/Time

Briefed By: _____ / _____
Health Physics Supervisor Date/Time

AUTHORIZATION TO EXCEED DOSE CONTROL AND 10CFR20 DOSE LIMITS

Table 2-2

Health Effects Associated with Whole-Body Absorbed Doses Received Within a Few Hours^a

Whole Body Absorbed dose (rad)	Early Fatalities ^b (percent)	Whole Body Absorbed dose (rad)	Prodromal Effects ^c (percent affected)
140	5	50	2
200	15	100	15
300	50	150	50
400	85	200	85
460	95	250	98

^a Risks will be lower for protracted exposure periods.

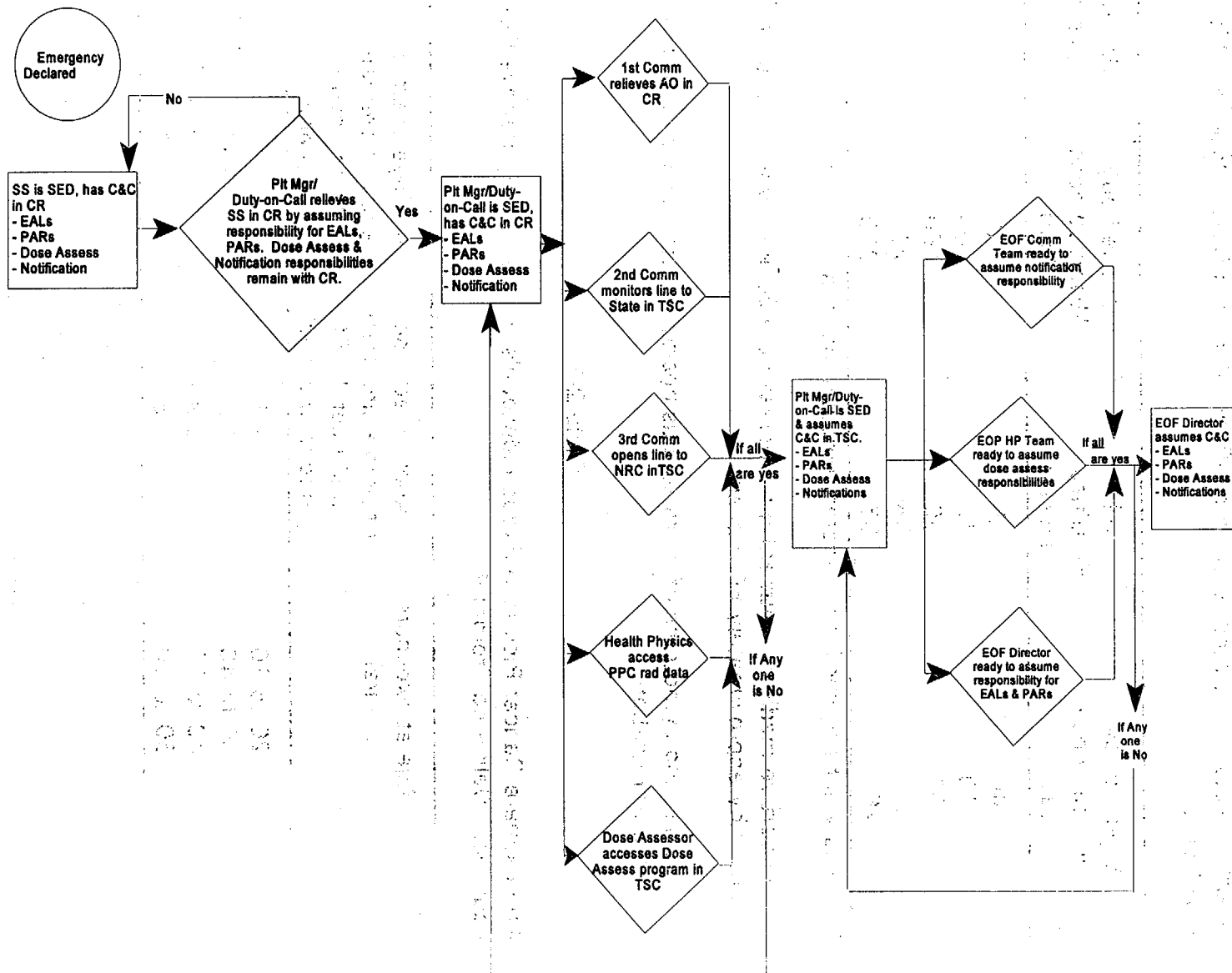
^b Supportive medical treatment may increase the dose at which these frequencies occur by approximately 50 percent.

^c Forewarning symptoms of more serious health effects associated with large doses of radiation.

Table 2-3

Approximate Cancer Risk to Average Individuals from 25 Rem Effective Dose Equivalent Delivered Promptly

Age at exposure (years)	Appropriate risk of premature death (death per 1,000 persons exposed)	Average years of life lost if premature death occurs (years)
20 to 30	9.1	24
30 to 40	7.2	19
40 to 50	5.3	15
50 to 60	3.5	11



CONSIDERATIONS FOR TURNOVER OF SED RESPONSIBILITIES

- _____ Plant Status
- _____ Current emergency classification
 - prognosis for classification change
- _____ Status of offsite notifications
 - time next Message is due
 - collect completed Messages
- _____ Dose Assessment responsibility (Site Area and General Emergency)
- _____ Protective Action Recommendations (General Emergency)
- _____ Status of Accountability
- _____ Status of Staff Augmentation
- _____ Status of completion of Mandatory, Subsequent and As Needed actions (EI-1, Att 2)
- _____ Additional Control Room needs
- _____ Consensus that Duty & Call has assumed SED responsibilities
- _____ PA announcement that Duty & Call is the SED in the Control Room or TSC, as appropriate