

January 25, 2002

10 CFR 50, Appendix E
Section V

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Emergency Plan Implementing Procedures

Furnished with this letter are revisions to the Monticello Nuclear Generating Plant Emergency Plan Implementing Procedures. The following procedures are revised:

<u>Procedure</u>	<u>Procedure Title</u>	<u>Revision</u>
A.2-102	Notification of Unusual Event (NUE)	16
A.2-103	Alert	15
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The following procedure is new:

A.2-110	Response to a Security Threat	0
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Please post changes in your copy of the Monticello Nuclear Generating Plant Emergency Plan Implementing Procedures. Superseded procedures should be destroyed. These revisions do not reduce the effectiveness of the Monticello Nuclear Generating Plant Emergency Plan.

Please contact Douglas A. Neve, Project Manager – Licensing (Interim), at 763-295-1353 if you require further information.



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1.0 PURPOSE

The purpose of this procedure is to provide instructions and guidance to the Duty Shift Manager (Interim Emergency Director) for implementation of the Monticello Emergency Plan during an Unusual Event.

Sections of this procedure which satisfy commitments M76060A, M82025A, M82026A, M82027A, and M82028A are marked with a \$.

2.0 APPLICABILITY

2.1 An Unusual Event has been declared at the Monticello Nuclear Generating Plant.

3.0 ORGANIZATION AND RESPONSIBILITIES

3.1 The Duty Shift Manager (Interim Emergency Director) is responsible for:

- 3.1.1 Implementation of this procedure.
- 3.1.2 Declaration of the emergency classification.
- 3.1.3 Implementation of the Emergency Plan and applicable EIPs.
- 3.1.4 Serve as the Technical Advisor to the Shift Supervisor and Control Room staff by maintaining a broad perspective of the event and providing technical/operational advice.
- 3.1.5 Determining the necessity for on-site protective actions, such as local, plant, or site evacuations.
- 3.1.6 Authorization of emergency radiation exposures.
- 3.1.7 Authorization to waive access security requirements for off-site emergency response personnel and vehicles.

3.2 The Duty Shift Supervisor is responsible for:

- 3.2.1 Implementation of this procedure (in the absence of the Duty Shift Manager).
- 3.2.2 Direction and coordination of Operations group activities.

3.3 The Shift Emergency Communicator(s) is responsible for:

- 3.3.1 Conduct of emergency notifications, including 15 minute State/County and NRC notifications under the direction of the Shift Manager.
- 3.3.2 Conduct of notifications IAW 4AWI-04.08.01.

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- 3.3.3 Coordination of off-site communications during the event under the direction of the Emergency Director.

4.0 DISCUSSION

This procedure provides instructions for the coordination of emergency response activities under the direction of the Duty Shift Manager (Interim Emergency Director). The procedure consists of three sections. Section NO TAG provides instructions for the immediate actions required for the declaration of an Unusual Event. Section 6.2 provides instructions for continuing or followup actions until the emergency event escalates or is terminated. Section 6.3 provides instructions for the escalation of the emergency classification or termination of the Unusual Event.

5.0 PRECAUTIONS

- 5.1 Continued surveillance and assessment of plant conditions throughout the event are necessary to ensure that the emergency classification is appropriately revised as conditions change.
- 5.2 All inquiries from the news media and/or general public should be directed to the Xcel Communications Department. Emergency response organization personnel should not release information to the media or general public without prior approval of the Chief Nuclear Officer or designee.
- 5.3 In the case of an event that rapidly escalates then de-escalates in emergency classification (i.e. plant conditions rapidly degrade then recover) or, the event is initiated at a higher emergency class then rapidly de-escalates, the initial emergency notifications **SHALL** indicate the current emergency classification and the highest emergency classification reached during the course of the event.
- 5.4 Search and rescue of missing persons should take precedence over repair or corrective actions unless such actions are necessary to effect rescue or protect the immediate health and safety of the general public.

6.0 INSTRUCTIONS

6.1 Immediate Actions

CAUTION

Notification of the State and Counties must be completed within 15 minutes of the declaration of an Notification of Unusual Event (NUE).

- 6.1.1 Page the Duty Shift Emergency Communicator (SEC) to the Control Room.

NOTE: The SEC should provide the Shift Manager with a copy of Form 5790-102-01 (NOTIFICATION OF UNUSUAL EVENT CHECKLIST).

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- 6.1.2 Initiate Form 5790-102-01 for the event.
- 6.1.3 Provide the SEC with the following information for completion of Form 5790-102-02 (MONTICELLO EMERGENCY NOTIFICATION REPORT FORM):
 - A. The time that the NUE was declared.
 - B. If the event involves a radioactive release.
 - C. The Guideline number used to classify the NUE.
 - D. Review and approve the completed Form 5790-102-02.
- \$ 6.1.4 Direct the SEC to proceed with emergency notification in accordance with 5790-102-04 (EMERGENCY CALL LIST - NUE).
- 6.1.5 If the emergency classification has security implications (e.g. Declared based on Guideline 17), ensure that the operator actions specified in C.4-L (RESPONSE TO SECURITY THREATS) are completed and exit this procedure and complete the actions specified in A.2-110 (RESPONSE TO A SECURITY THREAT).
- 6.1.6 Make (or direct) a public address (PA) announcement of the NUE declaration. The announcement should include a brief description of the situation, the reason for declaration and specific instructions for plant/site personnel. The announcement should be made to all site areas (using page access 305) and repeated a minimum of 3 times. An example announcement is as follows:

"ATTENTION SITE PERSONNEL, AN UNUSUAL EVENT HAS BEEN DECLARED. THE UNUSUAL EVENT WAS DECLARED AS A RESULT OF (state reason for declaration). PERSONNEL SHOULD CONTINUE NORMAL DUTIES UNLESS OTHERWISE INSTRUCTED."
- 6.1.7 If the event involves a fire, medical emergency or missing/trapped personnel, consider activation of the Fire Brigade IAW the following instructions:
 - A. A.3 Operations Manual, Fire Fighting Procedures
 - B. A.5-100 (ON-SITE MEDICAL EMERGENCIES)
 - C. A.2-303 (SEARCH AND RESCUE)

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6.1.8 If the event involves conventional (fire, toxic gas, etc.) and/or radiological hazards consider conducting a local evacuation of affected areas (or a Plant evacuation, if necessary) IAW EPIP A.2-301 (EMERGENCY EVACUATIONS). If an evacuation is conducted:

- A. Ensure personnel accountability is performed IAW the applicable section of EPIP A.2-205 (PERSONNEL ACCOUNTABILITY).
- B. Direct radiation protection and/or security to establish positive access controls for the evacuated area(s).

6.1.9 If the event includes radiological or chemistry implications, direct the Duty Shift Rad Prot Spec and/or Chemist to perform the necessary surveys and/or sampling.

6.1.10 If the event could involve radiological exposures (to response personnel) in excess of MNGP administrative or Federal limits, consider authorization of emergency exposures IAW EPIP A.2-401 (EMERGENCY EXPOSURE CONTROL).

6.1.11 Assess plant conditions and activities and consider implementation of STRICT PLANT STATUS CONTROLS. If implemented, make (or direct) a public address (PA) announcement regarding the initiation of Strict Plant Status Controls.

6.1.12 If local off-site emergency support (e.g. ambulance, Fire Department, LLEA, etc.) is required:

- \$ A. Ensure the applicable agencies are notified (either by the Control Room staff or SEC).
- B. Consider suspending certain access-safeguard requirements (e.g. vehicle search, visitor badging, etc.) for emergency vehicles and personnel entering the Protected Area.
- C. As necessary, direct Security supervision (Duty Lieutenant) to suspend the access requirements for off-site vehicles/personnel.

CAUTION

Notification of the NRC must be completed immediately after notification of the State, Counties and the MNGP ERO and no later than 1-hour after the declaration of the NUE.

\$ 6.1.13 As requested by the SEC, assist with the notification of the NRC as follows:

- A. Provide operational and technical information for the completion of Form 3195 (EVENT NOTIFICATION WORKSHEET).

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- B. Review the completed Form 3195, sign and date in the space provided.
 - C. Direct the SEC to complete NRC notifications in accordance with Part C of Form 5790-102-04 (EMERGENCY CALL LIST - NUE).
- \$ 6.1.14 Upon completion of all initial emergency notifications direct the SEC to initiate and transmit Form 5790-102-03 (EMERGENCY NOTIFICATION FOLLOW-UP MESSAGE) to the State of Minnesota and:
- A. Review, date and sign each completed Follow-up Message prior to transmittal.
 - B. Transmit a Follow-up Message at least every 30 minutes or at a frequency specified by the State (Duty Officer or DEM).
- \$ 6.1.15 Upon completion of the emergency notifications, direct the SEC to review the requirements for Event Notifications IAW 4 AWI-04.08.01 and:
- A. Determine if any individuals or organizations listed should be notified of the NUE (if not notified during the emergency notifications).
 - B. Initiate Form 3389 (EVENT NOTIFICATIONS).
 - C. Notify the identified organizations and complete Form 3389 indicating which organizations were notified and when.
- \$ 6.1.16 Review Form 5790-102-06 (SECONDARY NOTIFICATION LIST) to assist in determining if any additional organizations should be notified to assist in the emergency response. If desired, direct the SEC to notify the identified organizations.
- 6.1.17 If a designated Emergency Director (e.g. Plant Manager or other ED) responds to the event and turnover of ED responsibilities (to the designated ED) is desired, formally turn over responsibilities as follows:
- A. Provide a status update to the relieving ED on:
 - 1. Current plant conditions and implementations of abnormal and/or emergency operating procedures.
 - 2. A summary of the event and the status of emergency response actions underway or planned, including on-site protective actions.
 - 3. The current emergency classification and the status of Emergency Plan implementation.

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- B. Note the transfer of ED responsibilities in the Control Room and/or Shift Supervisors Log.

6.2 Continuing Actions

- 6.2.1 Manage the operational and overall emergency response activities on-site until relieved by another qualified Emergency Director or the event is terminated.
- 6.2.2 Assume the responsibilities of Shift Technical Advisor (STA) and:
 - A. Maintain a broad, overall operational perspective and provide technical/operational advice to the Shift Supervisor and Operations staff throughout the event.
 - B. Evaluate available data and information relative to the event to determine the actual and potential implications of the event from an operational perspective.
 - C. If problems arise, assess the operational aspects of the problems and provide input to the Control Room staff on possible solutions or mitigating efforts.
 - D. Maintain awareness of plant conditions and attempt to anticipate or predict transients. Advise the Shift Supervisor and Control Room staff on methods to avoid or mitigate adverse transients.
 - E. Assist the Shift Supervisor and Control Room staff with prioritization of operational and emergency response activities.
- 6.2.3 Continuously remain aware of plant conditions and critical parameters. Periodically, and if significant changes occur, compare plant conditions/parameters with the Emergency Action Levels (EALs) contained in EPIP A.2-101 (CLASSIFICATION OF EMERGENCIES).
- 6.2.4 Assess Operations Department staffing in the Control Room and augment as necessary.
- \$ 6.2.5 Throughout the event or until relieved by a designated Emergency Director, review, sign, and date completed Emergency Notification Follow-up Messages and direct the SEC to transmit the forms to the State of Minnesota.
- 6.2.6 Continuously monitor plant conditions throughout the event to determine if and when the NUE should be terminated or the emergency reclassified (to a higher emergency classification). Refer to Section 6.3 for event termination or reclassification instructions.

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6.3 Emergency Class Escalation or Termination

6.3.1 If the NUE is being terminated:

- A. Refer to the applicable section of EPIP A.2-602 (EVENT TERMINATION OR RECOVERY).
- B. Direct the SEC to complete a new Emergency Notification Report Form (Form 5790-102-02) and a new NUE Call-list (Form 5790-102-04) and:
 1. Review and sign the completed forms prior to transmittal off-site.
 - \$ 2. Ensure all organizations notified during the initial emergency notifications (when the NUE was declared) are notified of the event termination.
 3. Direct the SEC to make the termination notifications and report when all notifications are complete.
- C. Direct the SEC to collect and assemble all forms completed during the event and forward to the emergency preparedness group for review and filing.
- D. Make (or direct) a public address (PA) announcement of the NUE termination. An example announcement is as follows:

"ATTENTION SITE PERSONNEL. THE UNUSUAL EVENT IS TERMINATED. RESUME NORMAL DUTIES."
- E. Complete Form 5790-102-01 (NUE CHECKLIST) and forward to the SEC for inclusion with other emergency records.

6.3.2 If reclassification of the event is necessary:

- A. Reclassify the event IAW EPIP A.2-101 (CLASSIFICATION OF EMERGENCIES).
- B. Implement the applicable procedure for the new emergency classification:
 1. A.2-103 (ALERT)
 2. A.2-104 (SITE AREA EMERGENCY)
 3. A.2-105 (GENERAL EMERGENCY)
- C. Complete Form 5790-102-01 (NUE CHECKLIST) and retain as emergency records.

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7.0 FIGURES

FIGURE

7.1 Forms Utilized in this Procedure

1. 5790-102-01 Notification of Unusual Event (NUE) Checklist.
2. 5790-102-03 Emergency Notification Follow-up Message.
3. 5790-102-06 Secondary Notification List.

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1.0 PURPOSE

The purpose of this procedure is to provide instructions and guidance to the Duty Shift Manager (Interim Emergency Director) for implementation of the Monticello Emergency Plan during an ALERT.

Sections of this procedure which satisfy commitments M76060A, M82025A, M82026A, M82027A and M82028A are marked with a \$.

2.0 APPLICABILITY

2.1 An ALERT has been declared at the Monticello Nuclear Generating Plant.

3.0 ORGANIZATION AND RESPONSIBILITIES

3.1 The Duty Shift Manager (Interim Emergency Director) is responsible for:

- 3.1.1 Implementation of this procedure.
- 3.1.2 Declaration of the emergency classification.
- 3.1.3 Implementation of the Emergency Plan and applicable EPIPs.
- 3.1.4 Serve as the Technical Advisor to the Shift Supervisor and Control Room staff by maintaining a broad perspective of the event and providing technical/operational advice.
- 3.1.5 Determining the necessity for on-site protective actions such as local, plant, or site evacuations.
- 3.1.6 Authorization of emergency radiation exposures and/or use and issuance of Potassium Iodide (KI).
- 3.1.7 Authorization to waive access security requirements for off-site emergency response personnel and vehicles.

3.2 The Duty Shift Supervisor is responsible for:

- 3.2.1 Implementation of this procedure (in the absence of the Duty Shift Manager).
- 3.2.2 Direction and coordination of Operations group activities.

3.3 The Shift Emergency Communicator is responsible for:

- 3.3.1 Conduct of emergency notifications including 15 minute State/County and NRC notifications under the direction of the Shift Manager.
- 3.3.2 Coordination of off-site communications during the event under the direction of the Emergency Director.

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3.4 The Duty Operators are responsible for:

3.4.1 Implementation of applicable instructions of this procedure.

4.0 **DISCUSSION**

This procedure provides instructions for the coordination of emergency response activities under the direction of the Duty Shift Manager (Interim Emergency Director). The procedure consists of five sections. Section 6.1 provides instructions for the immediate actions required for the declaration of an Alert. Section 6.2 provides guidance for Control Room staffing during the emergency. Section 6.3 provides instructions for the continuing or follow-up actions until the emergency event escalates or is terminated. Section 6.4 provides instructions for the coordination of operations activities, performed by on-duty operations personnel dispatched from the Control Room, with the Operational Support Center (OSC). Section 6.5 provides instructions for the escalation of the emergency classification or the termination of the Alert.

5.0 **PRECAUTIONS**

- 5.1 Continued surveillance and assessment of plant conditions throughout the event are necessary to ensure that the emergency classification is appropriately revised as conditions change.
- 5.2 All inquiries from the news media and/or general public should be directed to the Joint Public Information Center at the State Emergency Operations Center. Emergency response organization personnel should not release information to the media or general public without prior approval of the Chief Nuclear Officer or designee.
- 5.3 In the case of an event that rapidly escalates then de-escalates in emergency classification (i.e. plant conditions rapidly degrade then recover), or, the event is initiated at a higher emergency class then rapidly de-escalates, the initial emergency notifications **SHALL** indicate the current emergency classification and the highest emergency classification reached during the course of the event.
- 5.4 Search and rescue of missing persons should take precedence over repair or corrective actions unless such actions are necessary to effect rescue or protect the immediate health and safety of the general public.

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6.0 INSTRUCTIONS

6.1 Immediate Actions

CAUTION
Notification of the State and Counties must be completed within 15 minutes of the declaration of an Alert.

- 6.1.1 Page the Duty Shift Emergency Communicator (SEC) to the Control Room.

NOTE: The SEC should provide the Shift Manager with a copy of Form 5790-103-01 (ALERT CHECKLIST).

- 6.1.2 Initiate Form 5790-103-01 (ALERT CHECKLIST) for the event.

- 6.1.3 Provide the SEC with the following information for completion of Form 5790-102-02 (MONTICELLO EMERGENCY NOTIFICATION REPORT FORM):

- A. The time that the Alert was declared.
- B. If the event involves a radioactive release.
- C. The Guideline number used to classify the Alert.
- D. Review and approve the completed Form 5790-102-02.

- \$ 6.1.4 Direct the SEC to proceed with emergency notification in accordance with 5790-104-04 (EMERGENCY CALL LIST - ALERT/SITE AREA/GENERAL).

- 6.1.5 If the emergency classification has security implications (e.g. Declared based on Guideline 17), ensure that the operator actions specified in C.4-L (RESPONSE TO SECURITY THREATS) are completed and exit this procedure and complete the actions specified in A.2-110 (RESPONSE TO A SECURITY THREAT).

- 6.1.6 Make (or direct) a public address (PA) announcement of the ALERT declaration. The announcement should include a brief description of the situation, the reason for declaration and specific instructions for plant/site personnel. The announcement should be made to all site areas (using page access 305) and repeated a minimum of 3 times. An example announcement is as follows:

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"ATTENTION SITE PERSONNEL, AN ALERT HAS BEEN DECLARED. THE ALERT WAS DECLARED AS A RESULT OF (state reason for declaration). ALL MEMBERS OF THE EMERGENCY RESPONSE PERSONNEL ORGANIZATION SHOULD REPORT TO THEIR DUTY STATIONS. ALL OTHER PERSONNEL STAND-BY FOR FURTHER INSTRUCTIONS."

- 6.1.7 If the event involves a fire, medical emergency or missing/trapped personnel consider activation of the Fire Brigade IAW the following instructions:
 - A. A.3 Operations Manual, Fire Fighting Procedures.
 - B. A.5-100 (ON-SITE MEDICAL EMERGENCIES)
 - C. A.2-303 (SEARCH AND RESCUE)
- 6.1.8 If the event involves conventional (fire, toxic gas, etc.), and/or radiological hazards consider conducting a local evacuation of affected areas (or a Plant evacuation, if necessary) IAW EPIP A.2-301 (EMERGENCY EVACUATIONS). If an evacuation is conducted:
 - A. Ensure personnel accountability is performed IAW the applicable section of EPIP A.2-205 (PERSONNEL ACCOUNTABILITY).
 - B. Direct radiation protection and/or security to establish positive access controls for the evacuated area(s).
- 6.1.9 If the event includes radiological or chemistry implications, direct the Duty Shift Rad Prot Spec and/or Chemist to perform the following activities until the Radiological Emergency Coordinator (REC) position is staffed:
 - A. Direct the duty shift Chemist to perform necessary in-plant chemistry sampling and/or initiate off-site dose projections using MIDAS.
 - B. Direct the duty Rad Prot Spec to conduct necessary radiation surveys, air sampling, or exposure control activities.
- 6.1.10 If the event could involve radiological exposures (to response personnel) in excess of MNGP administrative or Federal limits, consider authorization of emergency exposures IAW EPIP A.2-401 (EMERGENCY EXPOSURE CONTROL).
- 6.1.11 Assess plant conditions and activities and consider implementation of STRICT PLANT STATUS CONTROLS. If implemented make (or direct) a public address (PA) announcement regarding the initiation of Strict Plant Status Controls.

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6.1.12 If local off-site emergency support (e.g. ambulance, Fire Department, LLEA, etc.) is required:

- \$ A. Ensure the applicable agencies are notified (either by the Control Room staff or SEC).
- B. Consider suspending certain access-safeguard requirements (e.g. vehicle search, visitor badging, etc.) for emergency vehicles and personnel entering the Protected Area.
- C. As necessary, direct Security supervision (Duty Lieutenant) to suspend the access requirements for off-site vehicles/personnel.

CAUTION

Notification of the NRC must be completed immediately after notification of the State, Counties and the MNGP ERO and no later than 1-hour after the declaration of the Alert.

- \$ 6.1.13 As requested by the SEC, assist with the notification of the NRC as follows:
 - A. Provide operational and technical information for the completion of Form 3195 (EVENT NOTIFICATION WORKSHEET).
 - B. Review the completed Form 3195, sign and date in the space provided.
 - C. Direct the SEC to complete NRC notifications in accordance with Part C of Form 5790-104-04 (EMERGENCY CALL LIST - ALERT/SITE AREA/GENERAL).
- 6.1.14 Ensure the on-site emergency response facilities are activated IAW the applicable EPIPs.
- 6.1.15 If, based on preliminary information, the emergency declaration is attributed to a failure in work performance, consider conduct of Fitness-for-Duty (FFD) post-accident, for-cause testing IAW the FFD Handbook.
- \$ 6.1.16 Upon completion of all initial emergency notifications, direct the SEC to initiate and transmit Form 5790-102-03 (EMERGENCY NOTIFICATION FOLLOW-UP MESSAGE) to the State of Minnesota and:
 - A. Review, date, and sign each completed Follow-up Message prior to transmittal.
 - B. Transmit a Follow-up Message at least every 30 minutes or at a frequency specified by the State (Duty Officer or DEM).

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\$ 6.1.17 Review Form 5790-102-06 (SECONDARY NOTIFICATION LIST) to assist in determining if any additional organizations should be notified to assist in the emergency response. If desired, direct the SEC to notify the identified organizations.

6.1.18 When a designated Emergency Director (e.g. Plant Manager or other ED) responds to the event formally turnover responsibilities of Emergency Director as follows:

A. Provide a status update to the relieving ED on:

1. Current plant conditions and implementations of abnormal and/or emergency operating procedures.
2. A summary of the event and the status of emergency response actions underway or planned, including on-site protective actions.
3. The current emergency classification and the status of Emergency Plan implementation.

B. Note the transfer of ED responsibilities in the Control Room and/or Shift Supervisors Log.

6.1.19 Complete Form 5790-103-01 (ALERT CHECKLIST) and retain as emergency records.

6.2 Control Room Staffing

6.2.1 Continuously throughout the event, assess staffing in the Control Room and augment, as necessary. Request the assistance of the SEC (or Operations Group Leader, if staffed) if additional operations personnel must be contacted.

6.2.2 Establish emergency response staffing in the Control Room as follows:

- A. One non-duty Shift Manager (or Shift Supervisor) to staff the Control Room-to-Operations Group Leader telephone link.
- B. One non-duty Shift Manager (or Shift Supervisor) to staff the Emergency Notification System (ENS) link to the NRC Operations Center.
- C. One licensed or certified individual to staff the Control Room-to-TSC Technical Communicator telephone link.

6.2.3 When the Control Room is fully staffed, report staffing and activation status to the Operations Group Leader (or Emergency Director if the Operations Group Leader position is not staffed).

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6.3 Continuing Actions

- 6.3.1 Manage the operational and overall emergency response activities on-site until relieved by another qualified Emergency Director or the event is terminated.
- 6.3.2 Assume the responsibilities of Shift Technical Advisor (STA) and:
 - A. Maintain a broad, overall operational perspective and provide technical/operational advice to the Shift Supervisor, Operations staff, and TSC throughout the event.
 - B. Evaluate available data and information relative to the event to determine the actual and potential implications of the event from an operational perspective.
 - C. If problems arise, assess the operational aspects of the problems and provide input to the Control Room staff and TSC on possible solutions or mitigating efforts.
 - D. Maintain awareness of plant conditions and attempt to anticipate or predict transients. Advise the Shift Supervisor, Control Room, and TSC staffs on methods to avoid or mitigate adverse transients.
 - E. Assist the Shift Supervisor, Control Room, and TSC staff with prioritization of operational and emergency response activities.
- 6.3.3 Monitor EOP Implementation in the Control Room and:
 - A. Identify adverse trends and attempt to forecast (predict) significant events that could adversely affect the plant or accident mitigation efforts.
 - B. Compare parameter trends to predict necessary operational evolutions.
 - C. When significant adverse trends (or data) become known immediately, report these to the TSC.
- 6.3.4 If the event involves system or component failures:
 - A. Assist the Control Room and TSC in determining the cause of system or component failure and actions that may be required to return the system or component to an operational status.
 - B. Evaluate alternate systems, components, or methods that may be used (in lieu of the inoperable system or component) to restore needed capabilities or accomplish mitigation objectives.

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6.3.5 Periodically, and if significant changes occur, compare plant conditions/parameters with the Emergency Action Levels (EALs) contained in EPIP A.2-101 (CLASSIFICATION OF EMERGENCIES). Reclassify and/or terminate the emergency IAW Section 6.5 of this procedure.

\$ 6.3.6 Throughout the event or until relieved by a designated Emergency Director, review, sign, and date completed Emergency Notification Follow-up Messages and direct the SEC to transmit the forms to the State of Minnesota.

6.3.7 If a Plant evacuation is conducted, coordinate the personnel accountability process for Control Room personnel as follows:

A. Verify the location and physical well-being of all personnel assigned to the Control Room (e.g. duty Operators, Shift Supervisor, Fire Brigade members, etc.) and:

1. If the TSC is not yet activated verify that all Control Room personnel are accounted for by comparing the list to the known Control Room staffing (the duty shift staffing board outside the Shift Supv office may be used for this purpose).
2. If the TSC is activated, provide a list of the personnel accounted for to the Security Group Leader (or Emergency Director) in the TSC.

B. Monitor and maintain accountability for all Control Room personnel throughout the event.

6.4 Coordination of Operations with the OSC

6.4.1 Upon declaration of an ALERT, all Duty Operators should contact the Control Room immediately (via radio or telephone) for instructions and, unless directed otherwise, they should report (in-person) to the Control Room.

6.4.2 If a Plant (or Site) evacuation is conducted all duty Operators should report to the Control Room for personnel accountability.

6.4.3 During an ALERT, the duty Shift Manager or Shift Supervisor should coordinate duty Operator activities as follows:

A. Prior to OSC and TSC activation or if the EOF is being used as an alternate TSC/OSC (as in a security related event):

1. Operators dispatched from the Control Room should obtain a portable radio (from the Shift Supv Office or OSC) and remain in contact with the Control Room.

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2. Operators should use existing Extended or Specific RWP's to govern emergency response activities unless the protective requirements specified on the existing RWP's are clearly not adequate, in which case the Shift Manager should direct the duty shift RPS to activate the Extended Emergency RWP for operations emergency response activities (RWP #901).
 3. After selecting an appropriate RWP, Operators should log on to it using electronic dosimeters. If electronic dosimetry is not available, Operators should be issued dosimetry by the shift Rad Prot Spec and track their individual exposure until the OSC is operational.
 4. When an operations mission is complete, the Operators involved should check-in with the Control Room (in-person or via radio) for debriefing/reassignment.
 5. When the OSC becomes operational, the Shift Manager/Supervisor should provide a status report of all Operators dispatched to the OSC to facilitate OSC team tracking and ensure a smooth transition incorporating the OSC into operations activities.
- B. After the OSC and TSC are fully operational:
1. When dispatching duty Operators from the Control Room, the Shift Manager/Supervisor should immediately inform the Operations Group Leader of the Operators mission and destination.
 2. Operators should check-in with the OSC (in-person or by radio) prior to departing the Plant Administration Building (regardless of their destination in-plant or on-site) to ensure appropriate radiological precautions are implemented (e.g. exposure controls, protective clothing, etc.)
 3. Operators should use existing Extended/Specific RWP's or the Extended Emergency RWP as assigned by the Rad Prot Coord in the OSC for emergency response activities.
 4. After being assigned an RWP number, Operators should log-in on electronic dosimeters using the assigned RWP. If electronic dosimetry is not available, Operators should be issued dosimetry by the Rad Prot Coord and their exposure tracked in the OSC.
 5. Operators dispatched from the Control Room should obtain a portable radio (from the Shift Supv Office or OSC) and remain in contact with the Control Room and OSC.

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6. When an operations mission is complete, the Operators involved should check-in with the OSC (in-person or via radio) and return to the Control Room for debriefing/reassignment.
7. The Shift Manager/Supervisor should inform the Operations Group Leader of mission results.

6.5 Emergency Class Escalation or Termination

6.5.1 If termination of the emergency is appropriate, proceed as follows:

- A. If the TSC is fully operational (i.e. a designated Emergency Director is in-charge), recommend termination of the ALERT to the ED.
- B. If the TSC is not operational (i.e. Shift Manager is still the ED):
 1. Refer to the applicable section of EPIP A.2-602 (EVENT TERMINATION OR RECOVERY).
 2. Direct the SEC to complete a new Emergency Notification Report Form (form 5790-102-02) and a new Alert Call List (Form 5790-104-04) and review and sign the completed forms prior to transmittal off-site.
 3. Ensure all organizations notified during the initial emergency notifications (when the ALERT was declared) are notified of the event termination.
 - \$ 4. Direct the SEC to make the termination notifications and report when all notifications are complete.
 5. Direct the SEC to collect and assemble all forms completed during the event and forward to the emergency preparedness group for review and filing.
 6. Make (or direct) a public address announcement of the emergency termination. An example announcement is as follows:

"ATTENTION SITE PERSONNEL. THE ALERT IS TERMINATED. RESUME NORMAL DUTIES."
 7. Complete Form 5790-103-01 (ALERT CHECKLIST) and forward to the SEC for inclusion with other emergency records.

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6.5.2 If reclassification (escalation) of the emergency classification is necessary, proceed as follows:

- A. If the TSC is fully operational (i.e. a designated Emergency Director is in-charge), make recommendations regarding emergency classification changes to the Emergency Director.
- B. If the TSC is not operational (i.e. Shift Manager is still the ED):
 1. Reclassify the event IAW EPIP A.2-101 (CLASSIFICATION OF EMERGENCIES).
 2. Implement the applicable procedure for the new emergency classification (e.g. A.2-104 for a Site Area Emergency or A.2-105 for a General Emergency).
 3. Complete Form 5790-103-01 (ALERT CHECKLIST) and forward to the SEC for inclusion with other emergency records.

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7.0 FIGURES

FIGURE

7.1 Forms Utilized in this Procedure

1. 5790-103-01 Alert Checklist
2. 5790-102-03 Emergency Notification Follow-up Message
3. 5790-104-04 Emergency Call List - ALERT/SITE AREA/GENERAL

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<u>PROCEDURE</u>	<u>PROCEDURE TITLE</u>
<u>000 Series</u>	<u>Organization</u>
A.2-001	Emergency Organization
<u>100 Series</u>	<u>Activation</u>
A.2-101	Classification of Emergencies
A.2-102	Notification of an Unusual Event
A.2-103	Alert
A.2-104	Site Area Emergency
A.2-105	General Emergency
A.2-106	Activation and Operation of Technical Support Center
A.2-107	Activation and Operation of Operations Support Center
A.2-108	Access Control During Emergencies
A.2-109	Activation and Operation of the Backup OSC
A.2-110	Response to a Security Threat
<u>200 Series</u>	<u>Assessment</u>
A.2-201	On-Site Protective Action
A.2-202	Off-Site Monitoring During an Emergency
A.2-203	Radioactive Liquid Releases
A.2-204	Off-Site Protective Action Recommendations
A.2-205	Personnel Accountability
A.2-206	Work Control During Emergencies
A.2-207	Deleted 05/01/91
A.2-208	Core Damage Assessment
A.2-209	Responsibilities of Radiological Emergency Coordinator
A.2-210	Engineering Support in the TSC

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A.2-211	Intentionally Blank
<u>200 Series</u>	<u>Assessment (Cont'd)</u>
A.2-212	Intentionally Blank
A.2-213	Responsibilities of the Emergency Director
<u>300 Series</u>	<u>Protective Actions</u>
A.2-301	Emergency Evacuation
A.2-302	Activataion of the Assembly Points
A.2-303	Search and Rescue
A.2-304	Thyroid Prophylaxis (Potassium Iodide use)
<u>400 Series</u>	<u>Radiological Surveillance and Control</u>
A.2-401	Emergency Exposure Control
A.2-402	On-Site Radiological Monitoring
A.2-403	Deleted 04/14/94
A.2-404	Emergency Air Sampling and Analysis
A.2-405	Release Rate Determination
A.2-406	Off-Site Dose Projection
A.2-407	Personnel and Vehicle Monitoring and Decontamination
A.2-408	Sample Coordination During Emergencies
A.2-409	Self-Contained Breathing Apparatus (SCBA) Use During An Emergency
A.2-410	Out-of-Plant Surveys
A.2-411	Establishment of Secondary Access Control
A.2-412	Reactor Coolant Sample Obtained From Reactor Sample Station
A.2-413	Small Volume Liquid Sample Obtained at the Post Accident Sampling System
A.2-414	Large Volume Liquid Sample and/or Dissolved Gas Sample Obtained at Post Accident Sampling System
A.2-415	Containment Gas Sample Obtained at Post Accident Sampling System
A.2-416	Deleted 10/31/89
A.2-417	Draining the Trap, Sump and Collector of Post Accident Sampling System
A.2-418	Post Accident Sampling Station Demin Water Tank Fill Procedure

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A.2-419 Containment Atmosphere Sample Obtained From
Reactor Sample Station

400 Series Radiological Surveillance and Control (Cont'd)

A.2-420 Containment Atmosphere Radiochemical Analysis

A.2-421 Deleted 10/31/89

A.2-422 Stack Iodine/Particulate Sampling & Analysis

A.2-423 Reactor Building Vents Iodine/Particulate Sampling and Analysis

A.2-424 EOF Count Room Counting Procedure

A.2-425 Deleted 03/26/92

500 Series Communications and Documentation

A.2-501 Communications During an Emergency

A.2-502 Recordkeeping During an Emergency

A.2-503 Deleted 04/28/83

A.2-504 Emergency Communicator Duties in the TSC and OSC

600 Series Re-Entry and Recovery

A.2-601 Re-Entry

A.2-602 Event Termination or Recovery

A.2-603 Deleted 05/19/83

700 Series

A.2-701 PANS System False Alarm Activation or Failure

A.2-702 Response to an Emergency at Prairie Island

A.2-703 Response to Off-Site Situations Involving Radioactive Material

800 Series EOF Procedures

A.2-801 Responsibilities of the Emergency Manager

A.2-802 Activation and Operation of the EOF

A.2-803 Emergency Communications at the EOF

A.2-804 EOF Support and Logistics

A.2-805 Technical Support in the EOF

A.2-806 Radiation Protection Support in the EOF

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A.2-807 Off-Site Dose Assessment and Protective Action Recommendations

800 Series EOF Procedures (Con't)

A.2-808 Radiological Monitoring and Control at the EOF

A.2-809 EOF Security

A.2-810 Transfer to the Backup EOF

A.2-811 Event Termination or Recovery in the EOF

A.2-812 Off-Site Agency Liaison at the EOF

A.2-813 Intentionally Blank

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1.0 PURPOSE

- 1.1 This procedure provides guidance for responding to a credible security threat by the plant staff resulting in a declared emergency.

2.0 APPLICABILITY

- 2.1 This procedure **SHALL** apply to the duty Shift Manager, Shift Supervisor, Plant Manager, Emergency Director and plant personnel during a credible security threat. Specific Security Force actions and responses are described in the Safeguards Contingency Plan and procedures.

3.0 ORGANIZATION AND RESPONSIBILITIES

- 3.1 The Plant Manager or designee has responsibility to assist the Shift Manager during a plant security event.
- 3.2 The Operations Shift Manager has responsibility for safe operation of the plant and initiation of the Emergency Plan during a plant security event.
- 3.3 Operations Shift Supervisor has responsibility for plant operations and assessment of operational aspects of the emergency.
- 3.4 Superintendent Security/designee has responsibility to implement the Safeguards Contingency Plan during a security event and support the Operations Shift Manager as necessary.

4.0 DISCUSSION

Once a security threat (i.e., bomb threat, adversary threat, etc.) is determined to be HIGH credible security threat per NMC Security Threat Assessment (SE 0018), an ALERT should be declared per A.2-101 (CLASSIFICATION OF EMERGENCIES) and A.2-103 (ALERT).

Once a security threat (i.e., bomb threat, adversary threat, etc.) is determined to be LOW credible security threat per NMC Security Threat Assessment (SE 0018), an NUE should be declared per A.2-101 (CLASSIFICATION OF EMERGENCIES) and A.2-102 (NOTIFICATION OF UNUSUAL EVENT (NUE)).

The duty operations Shift Manager remains in charge of the overall plant response to the security threat with assistance from Plant Security, Operations, Local Law Enforcement Agencies (LLEA) and NMC staff.

If changing security or plant conditions warrant escalation to a higher emergency classification, the Shift Manager is responsible to authorize the escalation.

Implementation of Emergency Plan procedures during a security event may need to be modified, depending on the event, in order to protect the safety of plant personnel, vital equipment, or protect the health and safety of the public.

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4.1 Definitions

- 4.1.1 HIGH Credible Threat - The threat of physical attack to the plant represents a potential substantial degradation of the level of safety of the plant.
- 4.1.2 LOW Credible Threat - The threat of physical attack to the plant represents a potential degradation of the level of safety of the plant.

5.0 PRECAUTIONS

If a bomb or sabotage device is found:

- 5.1 Personnel should remain at a distance of 300 to 500 feet, if possible, from the device.
- 5.2 Unauthorized MNGP personnel **SHALL NOT** touch or disturb any bomb or sabotage device.
- 5.3 Hand-held electronic devices (i.e., radios, cell phones) should not be operated within a distance of 50 feet from the explosive device.

6.0 INSTRUCTIONS

6.1 Prerequisites:

- 6.1.1 A credible security related threat exists

AND

- 6.1.2 A Notification of Unusual Event, Alert, Site Area, or General Emergency has been declared.

6.2 Plant Manager/Designee Actions:

- 6.2.1 The Plant Manager or designee is to go to the Control Room to provide for communications.

6.3 Duty Shift Manager/Shift Supervisor Actions:

- 6.3.1 The Duty Shift Manager/Shift Supervisor should ensure the following activities are performed or considered.

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6.3.2 IF a bomb device exists,
THEN

- A. Make the following announcement over the Plant Public Address System (using PA access 305).
- B. Repeat the announcement as necessary to ensure that all Plant Personnel are informed.

"ATTENTION ALL PLANT PERSONNEL. ATTENTION ALL PLANT PERSONNEL.

"A BOMB MAY EXIST IN THE _____ AREA."
(specify area)

"STAY CLEAR OF _____."
(specify area)

6.3.3 IF an Alert has been declared based on a HIGH credible security threat,
THEN:

- A. Assume the position of Emergency Director in absence of Plant Manager or another Emergency Director designee.
- B. Make the following announcement over the Plant Public Address System (using PA access 305). Repeat the announcement as necessary to ensure that all Plant Personnel are informed.

"ATTENTION PLANT PERSONNEL, A THREAT TO PLANT SECURITY EXISTS. ALL EOF PERSONNEL ASSEMBLE AT THE BACKUP EOF. ALL OPERATIONS PERSONNEL AND FIRE BRIGADE PERSONNEL REPORT TO THE CONTROL ROOM. ALL OTHER PERSONNEL EVACUATE THE SITE."

- C. Activate ERO notification system to send EOF personnel to staff the Backup EOF in accordance with 5790-104-04 (EMERGENCY CALL LIST - ALERT/SITE AREA/GENERAL).
- D. Initiate an orderly evacuation of all personnel in the Owner Controlled Area, including the Site Administration Building, and any trailers or temporary office structures on-site.
- E. After initial emergency notifications are complete, ensure that the Shift Emergency Communicator transmits Form 5790-102-03 (EMERGENCY NOTIFICATION FOLLOW-UP MESSAGE) to the State of Minnesota every 30 minutes in accordance with A.2-501 (COMMUNICATIONS DURING AN EMERGENCY).

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- F. The Shift Manager working with the Emergency Manager is to provide appropriate plant representation in the Local Law Enforcement Agency (LLEA) command center to provide site facility and plant operations advice to the LLEA.
1. Ongoing management communication will take place from the Backup EOF.
 2. The hub for security communication will be the NMC Hudson Security Command Post at (715) 377-3353.
- G. Follow-up Threat Actions:
1. Ensure that the operator actions specified in C.4-L (RESPONSE TO SECURITY THREATS) are completed as appropriate.
 2. IF the threat results in plant damage and security risk to personnel no longer exists,
THEN
 - a. Activate the ERO Pager Network per the non-security related activation instructions in 5790-104-04 (EMERGENCY CALL LIST - ALERT/SITE AREA/GENERAL).
 - b. Return to A.2-103 (ALERT) for additional actions.
 - c. Evaluate the Emergency Classification in accordance with A.2-101 (CLASSIFICATION OF EMERGENCIES).
 3. IF the threat is resolved,
THEN
 - a. Terminate the event per A.2-601 (EVENT TERMINATION OR RECOVERY).
- 6.3.4 IF a Notification of Unusual Event (NUE) has been declared, based on a LOW credible security threat,
THEN
- A. Assume the position of Emergency Director in absence of Plant Manager or another Emergency Director designee.

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- B. Make the following announcement over the Plant Public Address System (using PA access 305). Repeat the announcement as necessary to ensure that all Plant Personnel are informed.

"ATTENTION PLANT PERSONNEL, A THREAT TO PLANT SECURITY EXISTS. ALL EOF PERSONNEL ASSEMBLE AT THE BACKUP EOF. ALL OPERATIONS PERSONNEL AND FIRE BRIGADE PERSONNEL REPORT TO THE CONTROL ROOM. ALL OTHER PERSONNEL EVACUATE THE SITE."

- C. Activate ERO notification system to send EOF personnel to staff the Backup EOF in accordance with 5790-102-04 (EMERGENCY CALL LIST - NUE).
- D. Initiate an orderly evacuation of all personnel in the Owner Controlled Area, including the Site Administration Building, and any trailers or temporary office structures on-site.
- E. After initial emergency notifications are complete, ensure that the Shift Emergency Communicator transmits Form 5790-102-03 (EMERGENCY NOTIFICATION FOLLOW-UP MESSAGE) to the State of Minnesota every 30 minutes in accordance with A.2-501 (COMMUNICATIONS DURING AN EMERGENCY).
- F. The Shift Manager working with the Emergency Manager are to provide appropriate plant representation in the Local Law Enforcement Agency (LLEA) command center to provide site facility and plant operations advice to the LLEA.
1. Ongoing management communication will take place from the Backup EOF.
 2. The hub for security communication will be the NMC Hudson Security Command Post at (715) 377-3353.
- G. Follow-up Threat actions:
1. Ensure that the operator actions specified in C.4-L (RESPONSE TO SECURITY THREATS) are completed as appropriate.
 2. IF threat becomes a higher threshold or plant damage occurs,
THEN
Reclassify and go to Alert Section 6.3.3 of this procedure.
 3. Shift Manager coordinate with EOF Manager to assess personnel needed in the EOF and release unnecessary EOF and JPIC personnel.

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4. Working with NMC headquarters management personnel, determine what essential activities should proceed. Personnel needed to support these activities should remain at work or called back in. All other personnel should go home. Inform such personnel of the determination through management channels.

5. IF threat is resolved,
THEN

Terminate event per A.2-602 (EVENT TERMINATION OR RECOVERY).