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**MAY 28 2003**

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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23

TRANSMITTAL OF EMERGENCY PROCEDURE REVISIONS

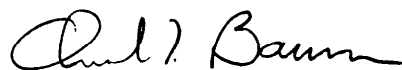
Ladies and Gentlemen:

In accordance with 10 CFR 50.4(b)(5) and Appendix E to 10 CFR 50, Progress Energy Carolinas, Inc., also known as Carolina Power and Light Company, is transmitting revisions to H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Emergency Implementing Procedures. The procedure revisions and effective dates are listed in the attachment to this letter.

A description of the procedure changes is provided on the "Summary of Changes" page for each emergency procedure. Please replace the superseded procedures with the enclosed revisions.

If you have any questions concerning this matter, please contact me.

Sincerely,



C. T. Baucom  
Supervisor – Licensing/Regulatory Programs

CAC/cac

Attachment

Enclosures

- c: L. A. Reyes, NRC, Region II (2 copies)  
NRC Resident Inspector, HBRSEP  
C. P. Patel, NRC, NRR (w/o Attachment and Enclosures)

### **Procedure Revisions and Effective Dates**

<b>Procedure</b>	<b>Revision No.</b>	<b>Effective Date</b>
EPPRO-04, "EP Performance Indicators"	4	04/30/03
EPCLA-02, "Emergency Action Level User's Guide"	10	05/05/03

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

PLANT OPERATING MANUAL

VOLUME 2

PART 5

**EPPRO-04**

***EP PERFORMANCE INDICATORS***

REVISION 4

## SUMMARY OF CHANGES

STEP #	REVISION COMMENTS
Cover Page	Revised cover page to reflect Progress Energy logo and formatting.
Entire Procedure	Revised page numbering format to reflect AP-007.
Attachment 8.1.6.1	Corrected information regarding the 15 minute time standard for PAR development upon receipt of field data. Added form for tracking performance indicator data and instructions for form completion.
Attachment 8.1.6.11	Revised instructions for obtaining data for the P&IR Corrective Action Program Status.

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### 8.1.1 PURPOSE

1. This procedure provides a consistent methodology for the collection, calculation and review of EP program Performance Indicator (PI) data. This is not an Emergency Plan implementing procedure.
2. Provide guidance for preparation of information as required to support the NRC Inspection and Oversight Program and the requirements of 10CFR50.54(t).
3. Establish responsibilities associated with the implementation of the Performance Indicator program.

### 8.1.2 DEFINITIONS/ABBREVIATIONS

1. PI&R - Problem Identification and Resolution
2. ARCA - Area Requiring Corrective Action
3. FEMA - Federal Emergency Response Agency
4. CR-SEC - Control Room Site Emergency Coordinator, An individual who has completed an EP-CR-SEC Qualification Checklist and is qualified as Superintendent-Shift Operations (SSO). This person's SSO duty area must be active in PQD.
5. CAPR - Corrective Action to preclude recurrence

### 8.1.3 RESPONSIBILITIES

1. Emergency Preparedness Supervisor:
  - a. Provide on-going monitoring and day-to-day oversight for EP Performance indicators.
  - b. Approve NRC Performance Indicator data elements prior to transmittal to the Licensing organization and assure timely transmittal.
  - c. Evaluate PI trends and initiate the appropriate Corrective Action Program (CAP) activities.
  - d. Assure the retention or retrievability of applicable records and documents that support PI data development.

**NOTE:** Site Performance Indicator colors of green, yellow and red correspond to NRC/NEI 99-02 performance indicator colors of green, white, and yellow, respectively.

#### 8.1.4 INSTRUCTIONS

##### 1. Key Performance Indicators (KPIs) - Risk Significant Indicators

The NRC and NEI have jointly developed a standard set of Cornerstone NRC Performance Indicators, for monitoring EP program performance by all licensees. NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," defines the three EP Cornerstone Performance Indicators as:

###### a. Drill/Exercise Performance

The percentage of all drill, exercise, and actual opportunities when presented with opportunities for classification of emergencies, notification of offsite authorities and development of protective action recommendations that were performed timely and accurately during the previous eight quarters.

###### b. Emergency Response Organization (ERO) Drill Participation

The percentage of key ERO members (as defined within NEI 99-02) that have participated in a drill, exercise, or actual event during the previous eight quarters, as measured on the last calendar day of the quarter. Robinson specific positions are listed on Attachment 8.1.6.5.

###### c. Alert and Notification System (ANS) Reliability

The percentage of ANS sirens that are capable of performing their function, as measured by periodic siren testing, in the previous 12 months. Periodic tests are the regularly scheduled tests that are conducted to actually test the ability of the sirens to perform their function (e.g. silent, growl, full volume test). The data compiled for each month is provided to Licensing by attachment 8.1.6.8 and a data sheet from REG-NGGC-0009. A computer data base provides the rolling calculation that takes into account the previous 12 months.

#### 8.1.4.1 (Continued)

##### 2. Data Providers

- a. Serve as primary point of contact and subject matter expert for assigned Performance Indicators
- b. Collect and Analyze source documents to provide oversight and monitoring of assigned Performance Indicators
- c. Initiate applicable attachments for documenting Performance Indicator data.

#### 8.1.4.2 Other Performance Indicators - Second Tier Indicators

Other Performance Indicators have been developed to monitor additional aspects of the EP program and provide management additional feedback on important areas of performance. The monthly input for the NRC performance indicators are included in this section.

- a. ERO Performance:
  - Classification Performance (Attachment 8.1.6.1)
  - Notification Performance (Attachment 8.1.6.1)
  - PAR Performance (Attachment 8.1.6.1)
  - Program Objective Demonstration (Attachment 8.1.6.2)
- b. ERO Readiness:
  - Staffing Depth Maintenance (Attachment 8.1.6.3)
  - Staffing Activation Response (Attachment 8.1.6.4)
  - Participation (Attachment 8.1.6.5)
- c. Facilities and Equipment:
  - Emergency Response Facility Availability (Attachment 8.1.6.6)
  - Equipment Readiness (Attachment 8.1.6.7)
  - Siren System Operability (Attachment 8.1.6.8)



#### 8.1.4.2 (Continued)

##### d. Procedure Quality:

- Procedure quality concerns will be addressed in the Problem Identification and Resolution (PI&R) process.

##### e. Offsite EP:

- FEMA Deficiency and ARCA status (Attachment 8.1.6.9)
- State and Local Agency Interface Status (Attachment 8.1.6.10)

##### f. PI&R:

- Corrective Action Program Status (Attachment 8.1.6.11)
- Drill and Exercise corrective actions (Attachment 8.1.6.11)
- Training Feedback (Attachment 8.1.6.12)

#### 3. PI Tracking and Reporting

##### a. EP second tier Performance Indicators

##### b. NRC Performance Indicators (REG-NGGC-0009)

#### 4. Data Collection, Calculation and Reporting

##### a. Performance Indicator data collection shall be performed on a monthly basis.

- Performance indicator data provided to the NRC, or utilized in assessing the need for 10CFR50.54(t) reviews, shall be based on end of calendar quarter calculations.
- Performance Indicator reports generated from other than end of quarter calculations shall be for management trending use only.

##### b. Methods of collecting raw data used in PI calculation are provided in the attachments of this procedure.

##### c. Significant changes to the monthly data which may result in adverse changes to the NRC PI quarterly data should be noted in the analysis portion of the monthly report for the affected indicator.

#### 8.1.4 (Continued)

##### 5. Problem Identification and Resolution

- a. EP Program performance indicator issues are addressed through the Corrective Action Program. Items which are potentially adverse to program quality are classified, documented and tracked in accordance with CAP-NGGC-0200.

#### 8.1.5 **RECORDS**

Records for EPPRO-04 will be retained by the EP staff for a period of 24 months.

#### 8.1.6 **ATTACHMENTS**

1. ERO Performance - Classification, Notification and PAR Performance
2. ERO Performance - Program Objective Demonstration
3. ERO Readiness - Staffing Depth Maintenance
4. ERO Readiness - Staffing Activation Response
5. ERO Readiness - Participation
6. Facilities and Equipment - Emergency Response Facility Availability
7. Facilities and Equipment - Equipment Readiness
8. Facilities and Equipment - Siren System Operability
9. Offsite EP - FEMA Deficiency and ARCA Status
10. Offsite EP - State and Local Agency Interface Status
11. PI&R - Corrective Action Program Status
12. PI&R - Training Feedback
13. ERO Key Position Matrix (CR-27272)

## ERO PERFORMANCE - CLASSIFICATION, NOTIFICATION AND PAR PERFORMANCE

### Purpose

This indicator monitors timely and accurate performance in drills, exercises and actual events when presented with opportunities for classification of emergencies, notification of offsite authorities and development and notification of protective action recommendations (PARs).

### Definition

The percentage of pre-identified drill, exercise, and actual opportunities that were performed timely and accurately during the reporting period. Pre-identified opportunities are:

- Actual declared events and those scheduled exercises (drills) that EP coordinates and develops the scenarios with Licensed Operator Continuing Training.
- Pre-identified simulator sessions that use the same scenarios as above when qualified SSOs fill the SSO/SEC position.
- Evaluated simulator sessions involving EAL classification and notification activities when qualified SSOs fill the SSO/SEC position. (AR #85114)
- Unannounced Fire Drills where the scenario results in an EAL classification.
- If other drill, exercises, and tabletops that meet the NEI 99-02 performance criteria are pre-identified by memo, then each additional pre-identified opportunity must be counted in the DEP statistics.
- Opportunities are:
  - Each expected classification or upgrade in classification.
  - Each PAR developed.
  - Each initial notification of an emergency class declaration.
  - Each initial notification of PARs or change to PARs.
- An initial notification form completed appropriate to the event to include:
  - Class of emergency
  - EAL number
  - Description of emergency
  - Wind speed and direction
  - Whether offsite protection measures are necessary
  - Potentially affected population and areas
  - Whether a release is taking place
  - Date and time of declaration of emergency
  - Whether the event is a drill or actual event
  - Plant identification

**ERO PERFORMANCE - CLASSIFICATION, NOTIFICATION AND PAR PERFORMANCE**

Expectations are:

- Classifications should be made in  $\leq 15$  minutes per EPCLA-02.
- Off-site notification contact should be made in  $\leq 15$  minutes per EPNOT-01.
- PARs should be developed and notification initiated in  $\leq 15$  minutes of a General Emergency classification. If the event conditions change, either radiological or meteorological, resulting in revised PARs, then the  $\leq 15$  minute standard is applicable. The 15 minute time standard for PAR development applies once field data is obtained not from the time the dose projection is completed.

Green -  $\geq 95\%$

Yellow -  $\geq 90\% < 95\%$

Red -  $< 90\%$

**Documentation**

Information is gathered from Emergency Notification Forms generated from the ERFIS computer and/or the manual Emergency Notification Forms. ERO Performance is tracked on Attachment 8.1.6.1 worksheets or equivalent, as applicable.

Data from the Attachment 8.1.6.1 worksheets is collated monthly on data sheets contained in REG-NGGC-0009.

**Notes**

Errors on the ENF that do not affect the content or intent of the message do not count as an error. Examples include:

- Typographical errors that do not change the meaning of the information.
- Information left blank instead of "none" or "N/A".

ATTACHMENT 8.1.6.1  
Page 3 of 4  
**ERO PERFORMANCE INDICATOR WORK SHEET**

Date: \_\_\_\_\_

Page \_\_\_\_ of \_\_\_\_

Sections 1 and 2 to be completed by the evaluator.

**Section 1**

Actual Emergency <input type="checkbox"/>	Simulator Evaluation <input type="checkbox"/>	Exercise/Drill <input type="checkbox"/>
Scenario # _____		
Name of SEC:		
Evaluator Name:		

**Section 2**

ACTIVITY	UE	ALERT	SAE	GE
Record the time indications are available that an EAL has been exceeded.				
Check the expected event declaration				
Was the expected event declaration made? (yes or no)				
Record the time the event was declared.				
Record the time the Emergency Notification Form was approved.				
Record the time of first voice contact after ENF approval				
Were the correct initial protective action recommendations made?				
Were the State and Counties notified of the PARs within 15 minutes?				
Record the time conditions were available that resulted in a change in the PARS?				
Record the time the Emergency Notification Form with the change in PARs was approved.				
Record the time of first voice contact after ENF approval.				
Were the State and Counties notified of the change in PARs within 15 minutes?				

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Section 3 to be completed by EP staff.

**Section 3**

Classification(s) Expected: UE <input type="checkbox"/>	Alert <input type="checkbox"/>	SAE <input type="checkbox"/>	GE <input type="checkbox"/>
Classification(s) Declared: UE <input type="checkbox"/>	Alert <input type="checkbox"/>	SAE <input type="checkbox"/>	GE <input type="checkbox"/>
Classification Opportunities:	Successes:		
Notification Opportunities:	Successes:		
PAR Development Opportunities:	Successes:		
PAR Notification Opportunities:	Successes:		

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Prepared by: \_\_\_\_\_  
 Reviewed by: \_\_\_\_\_

## ATTACHMENT 8.1.6.1

### Page 4 of 4

**Standard:** Timely and accurate EAL classifications, notifications, and PARs are performed during actual events, evaluated simulator scenarios with an EAL classification, and EP drills/exercises. Timely is defined as  $\leq 15$  minutes.

**Method of Data Collection:** The evaluator will complete Sections 1 and 2 of the attached ERO Performance Tracking Form.

**Opportunities:** are to be as defined by the activities included in the examination evaluation guide and presence of conditions during the examination as follows (opportunities cannot be excluded due to poor performance):

- Each expected classification should be included.
- Notification includes notifications made to the state and/or local government authorities for **initial** emergency classification, upgrade of emergency class, initial PARs and changes in PARs (periodic follow-up notifications and briefings when the classification or PARs have not changed are not included).
- PAR includes the initial PAR and any PAR change.

*Timely:*

- Classifications are made consistent with the goal of 15 minutes once plant parameters reach an Emergency Action Level (EAL).
- Offsite state/county notifications are initiated within 15 minutes of event classification. Refer to EPNOT-01.
  - Communicating the event with an Emergency Communicator present/simulated.
  - Completion of the Emergency Notification Form to include initiation of the Fax with adequate time allotted for an EC (Simulated EC activities) to have completed steps as outlined above when EC not present/simulated.
- PARs are developed and notification initiated within 15 minutes of a General Emergency classification, or change in conditions resulting in revised PARs.

*Accurate (numbers in parenthesis indicate Emergency Notification Form line numbers):*

- Classifications are performed and declared in accordance with EPCLA-01 and the EALs.
- Notifications
  - Event declaration notifications, as a minimum, contain indication of Drill or Actual (1), Plant site/unit (2), correct event classification level (5), declaration time & date (6), Emergency description (7), Emergency Release status (10), Wind Speed & direction (14) and PARs (or None) (15).
  - Notifications that include PARs must provide the correct Sector information for Evacuation and Sheltering (15).
  - The cumulative effect of multiple omissions or errors in other areas of the notification needs to be evaluated for impact on overall accuracy.
- PARs are appropriate to the event and meteorological conditions as specified in EPCLA-01.

Copies of the completed Emergency Notification Form(s), completed Persons and Agencies Alerted Form(s) if applicable, and any completed Communications Checklist(s) if applicable, are to be attached to the ERO Performance Tracking Form. Route the completed forms to the Emergency Preparedness Group.

**Disposition:** Once completed and forwarded to Emergency Preparedness, the data collected on the form will be used to track RNP monthly plant key performance indicators and the NRC quarterly cornerstone performance indicators.

**Remediation for Unsatisfactory performance:** Unsatisfactory performance during evaluated scenarios on the RNP simulator conducted by the RNP Training Section will be identified in an NCR and remediated in accordance with Training Program Procedures.

**ERO PERFORMANCE - PROGRAM OBJECTIVE DEMONSTRATION**

Reporting month \_\_\_\_\_

Total number of required drill objectives	
Drill objectives not met	
Drill objectives met	
Percentage of successful drill objectives	

Total number of required drill objectives - required Drill objectives not met = Drill objectives met

Drill objectives met

% Program Objectives Performance = Total required drill objectives x 100

**Purpose**

This indicator monitors the performance of drill and exercise objectives when presented with opportunities for their demonstration.

**Definition**

The percentage of pre-identified drill and exercise objectives that were performed successfully.

A program objective does not require a drill involving all of the emergency response facilities to be counted in this indicator. A drill is of appropriate scope if it reasonably simulates the interaction or conditions necessary to fully demonstrate the program objective.

A program objective demonstrated by more than one facility is counted as an opportunity for each of the facilities (for example, command and control would present four opportunities for a drill involving the TSC, OSC, EOF, and JIC).

Green - ≥ 90% of drill objectives

Yellow - ≥ 80% < 90% of drill objectives

Red - < 80% of drill objectives

**Documentation**

The drill / exercise objectives are stated in pre-drill information. Objective demonstration is documented in the drill / exercise critiques.

**Notes**

ATTACHMENT 8.1.6.3  
Page 1 of 1  
**ERO READINESS - STAFFING DEPTH MAINTENANCE**

**Purpose**

This indicator reflects the ability to maintain a fully staffed ERO for a prolonged response by measuring the ERO staffing depth for all positions.

**Definition**

ERO depth is required to assure 24x7 coverage for emergencies requiring full staffing of the ERFs. Minimum 24 hour staffing requires 2 personnel per ERO position with no unavailability. A minimum of four personnel per position assures sufficient depth to allow for unavailability due to vacation or illness. ERO positions filled by pools of personnel are not included in this indicator.

Green - No position less than four deep for greater than 4 months.

Yellow - Any position filled less than four deep for greater than 4 months.

Red -Any 2 positions filled less than four deep for greater than 4 months.

**Documentation**

Reporting month \_\_\_\_\_

Emergency Response Organization Team Roster applicable on the last day of the calendar month.

Vacant Position	Date Open	Date Filled	Months Open
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

**Notes**



**ERO READINESS - STAFFING ACTIVATION RESPONSE****Purpose**

This indicator reflects the ability to contact ERO members for augmentation of the on-shift ERO.

**Definition**

This indicator measures the ability to contact ERO members for augmentation of the on-shift ERO per table 5.3.2-1 of PLP-007.

Use the quarterly beeper test documents to determine

- a. number expected to respond
- b. number that received the code.

Green - > 80% of personnel issued a pager and expected to respond, received the appropriate code.

Yellow -  $> 75\% \leq 80\%$  of personnel issued a pager and expected to respond, received the appropriate code.

Red -  $\leq 75\%$  of personnel issued a pager and expected to respond, received the appropriate code.

**Documentation**

Reporting month \_\_\_\_\_

The Quarterly Beeper Drill results per EPPRO-02.

Previous Quarter (end of quarter value)  Date _____  Drill Response _____	Previous Quarter (end of quarter value)  Date _____  Drill Response _____	Previous Quarter (end of quarter value)  Date _____  Drill Response _____	Current Quarter (end of quarter value)  Date _____  Drill Response _____
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**Notes**

ATTACHMENT 8.1.6.5  
Page 1 of 4  
**ERO READINESS - PARTICIPATION**

**Purpose**

This indicator monitors the opportunities that key ERO members have been provided to gain proficiency as an integrated organization. It measures the percentage of those personnel who were participants, coach/mentors, evaluators or controllers in proficiency-enhancing drill/exercise opportunities or in actual events.

**Definition**

The percentage of key ERO members (per Attachment 8.1.6.13) who were participants, coach/mentors, evaluators or controllers in proficiency-enhancing drill/exercise opportunities or in actual events during the reporting period.

Green -  $\geq 90\%$

Yellow -  $\geq 80\% < 90\%$

Red -  $< 80\%$

Key Members are as follows:

**Control Room**

Site Emergency Coordinator

**Technical Support Center**

Site Emergency Coordinator

Plant Operations Director

Radiological Control Director

Technical Analysis Director

NRC Emergency Communicator

**Emergency Operations Facility**

Emergency Response Manager

Radiological Control Manager

Emergency Communicator

**Operational Support Center**

Operational Support Center Leader

**Documentation**

ERO Drill Rosters

ERO Database

Self-assessments of the drill cycles

Data sheets are contained in REG-NGGC-0009.

ATTACHMENT 8.1.6.5  
Page 2 of 4  
**ERO READINESS - PARTICIPATION**

**Notes**

Personnel are given credit for the ERO position for which they hold during a drill. Personnel holding multiple ERO positions must participate in a drill for each position they are qualified for. (CR25154)

**Data Collection Method**

The data and documentation for this indicator is obtained by performing the following steps.

Open in Microsoft Access, folder V://Access Databases/Shared/EP/

From this folder, open file EROdata.mdb.

Select Reports

Right click on "rptAllQualifiedKPIPositions."

Right click on "Print Preview."

When accessing "rptAllQualifiedKPIPositions," the database will ask for the first day of last year, then the last day of this year. These dates must be entered as mm/dd/yyyy and are checking the database for individuals who are currently qualified as a "Key" position.

From the "Print Preview" screen, print the report.

This report will indicate all ERO members who are qualified one or more ERO positions defined in NEI 99-02 as a "Key" position (reference Attachment 8.1.6.13).

The other half of the data is obtained from Microsoft Excel by performing the following steps.

ATTACHMENT 8.1.6.5  
Page 3 of 4  
**ERO READINESS - PARTICIPATION**

**NOTE:** for the following steps, the examples will be based on the month of June 2001 indicator being calculated on the 2nd of July 2001.

Open in Microsoft Excel, folder V://Regulatory Affairs/EP/Performance Indicators/

From this folder, open the file for the previous month. Remember the previous month may be two months ago depending on the date the indicator is being calculated. For example if this is July 2, 2001, then open the file titled "NRC KPI Info Tables May 2001.xls". You would be calculating the indicator for the month of June 2001.

Save this file as "NRC KPI Info Tables {month being calculated and year} June 2001.xls".

After the file has been saved, from the pull-down menu, select "view," then "Headers and Footers." This opens a "Page Setup" window.

From the "Page Setup" window, select the "Header/Footer" tab, and then select "Custom Header.." This will open the "Header" window.

In the "Center Section" of the window, scroll down and update the month for the indicator being calculated (June), and the dates for the previous eight quarters then select "Ok."

Select "Ok" to close the "Page Setup" window.

Determine if any drills conducted during the month being calculated were credited as "Drill, Exercise, Performance (DEP) drills. This information may be obtained from the Supervisor-EP.

If DEP drills were conducted during the month being calculated, then enter in the spreadsheet the most recent dates for those who signed the training report. Key ERO positions may receive credit for the positions of participant (P), controller ©, or evaluator (E) only (not mentor/coach). Ensure the individual gets credit only for the ERO position they signed on the training report. For those ERO members who you are adding new dates, ensure the Role column is updated with a P, C, or E to indicate their level of participation. Finally update the Comments column to indicate where you can verify the participation (i.e. training reports, ENFs)

ATTACHMENT 8.1.6.5  
Page 4 of 4  
**ERO READINESS - PARTICIPATION**

After entering the participation dates, verify all of the dates on the spreadsheet fall within the previous eight quarters period. Any date that is prior to the previous eight quarters must be removed and replaced with the text "None" for the Drill Date and "N/A" in the Role column.

Print the spreadsheet. Count the number of qualified individuals and verify the number agrees with the total in the Total Qualified cell.

Count the drill dates for both the Drill Date and Simulator Evaluation Date columns and add the values. Verify the number agrees with the total in the Total Participated cell.

Count the number of qualified individuals from the Access report agrees with the total number of individuals in the Excel spreadsheet, then sign and date the bottom of the Excel spreadsheet.

REG-NGGC-009, "NRC Performance Indicators", contains the data sheets for this indicator. Print the attachment for "Emergency Response Organization Drill Participation." This attachment is where you document the Total number of Key ERO Members from the Excel spreadsheet and the total number of Key ERO members who have participated within the previous eight months also from the spreadsheet.

Attach to the REG-NGGC-009 form the Access database report, the Excel Spreadsheet, and the pages from EPPRO-04 describing the ERO Readiness-Participation.

## FACILITIES AND EQUIPMENT - EMERGENCY RESPONSE FACILITY AVAILABILITY

### Purpose

This indicator reflects the ability to maintain plant Emergency Response Facilities in a state of readiness to support emergency response activities.

### Definition

The measure of time, in percent, that the TSC and EOF are fully functional and available to support emergency response activities, as measured on a calendar month basis.

Availability includes all of the key capabilities:

- Habitability (Ventilation & pressure control)
- Electrical Power (as supplied from any source)
- ERFIS
- Communications

Green -  $\geq 99\%$  ERF availability for the last calendar month.

Yellow  $< 99\%$  and  $\geq 95\%$  ERF availability for the last calendar month.

Red  $< 95\%$  ERF availability for the last calendar month.

### Documentation

Reporting month \_\_\_\_\_

Hours Em. Response Facility available \_\_\_\_\_  
 Hours in the calendar month \_\_\_\_\_ x 100 = \_\_\_\_\_ % available

Autolog, Work order/request queries

Facility walkdowns can all be used to determine actual hours available

### Notes

ATTACHMENT 8.1.6.7  
Page 1 of 1  
**FACILITIES AND EQUIPMENT - EQUIPMENT READINESS**

**Purpose**

This indicator reflects the ability to maintain plant components and ERF equipment needed to support emergency response activities.

**Definition**

This indicator includes ERF equipment such as Facility Communication Systems, ERDS, Quarterly Inventories, and the Local Government Radio System, which are included in the Emergency Preparedness periodic test program.

Green - No individual or repetitive problem greater than 184 days to resolve.  
Yellow - No 2 individual or repetitive problems greater than 184 days to resolve.  
Red - > 2 individual or repetitive problems greater than 184 days to resolve.

**Documentation**

Reporting month \_\_\_\_\_

The following EPPRO-02 Surveillance test results are screened for equipment problems:

Monthly Selective Signaling System Communication Drill  
Monthly Local Government Radio Test  
Monthly ETS/ESSX/Selective Signaling System Phone Tests  
Quarterly Off Site Selective Signaling Phone Check

Equipment/Repetitive Problem	Date discovered	Date resolved	Total days
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

**Notes**

**FACILITIES AND EQUIPMENT - SIREN SYSTEM OPERABILITY****Purpose**

This indicator monitors the reliability of the offsite Alert and Notification System (ANS). It provides the percentage of the sirens that are capable of performing their safety function.

**Definition**

The percentage of ANS sirens that are capable of performing their function, as measured by periodic siren testing. Periodic tests are the regularly scheduled tests conducted to actually test the ability of the sirens to perform their function (e.g., silent, growl, full volume test).

**Documentation**

Records from the silent, growl and full volume tests. This information is also available from the EP siren database.

Green -  $\geq 96\%$

Yellow -  $\geq 94\% < 96\%$

Red -  $< 94\%$

Data sheets are contained in REG-NGGC-0009

**Notes**

A failure of sensing equipment that does not result in the siren being inoperable (e.g., rotation sensor) will not count as a siren failure if the siren is verified functional by local observation.



**OFFSITE EP - FEMA DEFICIENCY AND ARCA STATUS**

Previous Quarter	Previous Quarter	Previous Quarter	Current Quarter
Deficiencies _____	Deficiencies _____	Deficiencies _____	Deficiencies _____
ARCA _____	ARCA _____	ARCA _____	ARCA _____

**Purpose**

This indicator measures the performance of exercise objectives by offsite agencies during FEMA evaluated exercises with fixed nuclear facilities.

**Definition**

If there is no RNP exercise during the period, then the value remains the same as the previous period.

Green - Either of these two conditions exist:

1. FEMA Exercise Report identified no "Deficiencies" AND no more than 1 "Area Requiring Corrective Action" for any individual offsite agency involved.
2. A total of  $\leq 2$  ARCAs.

Yellow - Either of these two conditions exist:

1. FEMA Exercise Report identified no "Deficiencies" AND no more than 2 "Area Requiring Corrective Action" for any individual offsite agency involved.
2. A total of  $\leq 3$  ARCAs.

Red - Any of these three conditions exist:

1. FEMA Exercise Report identified a "Deficiency".
2.  $\geq 3$  "Area Requiring Corrective Action" for any individual agency involved.
3. A total of  $\geq 4$  ARCAs.

**Documentation**

FEMA reports from the biennial graded exercise and MS-1 drills provide this information.

**Notes**

Agencies from Darlington, Lee, Chesterfield and Florence Counties and the State of South Carolina are considered for this indicator.

**Data Collection Method**

This data is obtained from the State EMD Area 4 Coordinator.

**OFFSITE EP - STATE AND LOCAL AGENCY INTERFACE STATUS****Purpose**

This indicator measures the effectiveness of the interface with the offsite agencies.

**Definition**

The color codes for this indicator are based on an average rating from the feedback forms completed and returned by the offsite agencies. If feedback is not measured during the quarter, the value remains the same as the previous quarter.

Green - Overall rating  $\geq 4$  (meeting expectations)

Yellow - Overall rating  $\geq 2$  or  $< 4$  (meets some expectations)

Red - Overall rating  $< 2$  (below expectations)

The offsite agencies consist of:

The South Carolina EMD and DHEC

The Lee County

The Darlington County

The Chesterfield County

The Florence County - Florence County is the host county for evacuations.

**Documentation**

The Offsite Survey.

**Notes****Data Collection Method**

Page of this attachment is given to the above off-site agencies then averaged.

**OFFSITE EP - STATE AND LOCAL AGENCY INTERFACE STATUS****OFF SITE SURVEY**

Rate the following questions A through E, 1 being the lowest and 5 the highest, for satisfaction of the interface with H.B. Robinson?

- |    |  |   |   |   |   |   |
|----|--|---|---|---|---|---|
| A. | Does H. B. Robinson meet your classroom training needs?                            | 1 | 2 | 3 | 4 | 5 |
| B. | Are equipment problems resolved in a timely fashion?                               | 1 | 2 | 3 | 4 | 5 |
| C. | Are drills effective in meeting the needs of your agency?                          | 1 | 2 | 3 | 4 | 5 |
| D. | Are problems identified in the quarterly meetings resolved in an efficient manner? | 1 | 2 | 3 | 4 | 5 |
| E. | What is your comfort level in communicating with the EP staff at H. B. Robinson?   | 1 | 2 | 3 | 4 | 5 |

Comments:

Agency represented \_\_\_\_\_

By \_\_\_\_\_ / \_\_\_\_\_  
Name Date

Please return this sheet to the EP Supervisor at the Robinson Site.

**PI&R - CORRECTIVE ACTION PROGRAM STATUS****Purpose**

This indicator monitors corrective action identification and completion for timely problem resolution assigned to EP staff members for significant adverse and adverse conditions.

**Definition**

Corrective Action identification and resolution per the CAP program (CAP-NGGC-0200) assigned to EP staff members for significant adverse and adverse conditions.

Green - Average age of significant adverse investigations  $\leq$  21 days

Yellow - Average age of significant adverse investigations  $>$  21 days and  $\leq$  23 days

Red - Average age of significant adverse investigations  $>$  23 days

Green - Average age of significant adverse CAPRs  $\leq$  90 days

Yellow - Average age of significant adverse CAPRs  $>$  90 days and  $\leq$  99 days

Red - Average age of significant adverse CAPRs  $>$  99 days

Green - Average age of adverse investigations  $\leq$  30 days

Yellow - Average age of adverse investigations  $>$  30 days and  $\leq$  33 days

Red - Average age of adverse investigations  $>$  33 days

Green - Average age of corrective actions  $\leq$  120 days

Yellow - Average age of corrective actions  $>$  120 days and  $\leq$  132 days

Red - Average age of corrective actions  $>$  132 days

Month/Year _____			
Indicator	Average Age	Color (circle one)	Trend (circle one)
Significant Adverse Investigations	days	Green Yellow Red	— ▼ ▲
Significant Adverse CAPRs	days	Green Yellow Red	— ▼ ▲
Adverse Investigations	days	Green Yellow Red	— ▼ ▲
Corrective Actions	days	Green Yellow Red	— ▼ ▲

**PI&R - CORRECTIVE ACTION PROGRAM STATUS****Documentation**

Information to support this performance indicator is obtained from Business Objects KPI Reports generated for end of month data. These reports automatically print on the first business day following the end of the month.

1. Review the reports to ensure that items attributed to EP are identified in the report.
2. Select the following report: "Average Age of Priority 1 Evaluations"
  - Enter the average age of the open significant adverse investigations on Attachment 8.1.6.11.
  - If no open significant adverse investigations are found, then enter NA in the table on Attachment 8.1.6.11.
3. Select the following report: "Average Age of Open CAPRs"
  - Enter the average age of the open significant adverse CAPRs on Attachment 8.1.6.11.
  - If no open significant adverse CAPRs are found, then enter NA in the table on Attachment 8.1.6.11.
4. Select the following report: "Average Age of Priority 2 Evaluations"
  - Enter the average age of the open adverse investigations on Attachment 8.1.6.11.
  - If no open adverse investigations are found, then enter NA in the table on Attachment 8.1.6.11.
5. Select the following report: "Average Age of Open Priority 1 & Priority 2 Corrective Actions"
  - Enter the average age of the open priority 1 and 2 corrective actions on Attachment 8.1.6.11.
  - If no open priority 1 and 2 corrective actions are found, then enter NA in the table on Attachment 8.1.6.11.
6. Compare the average age for each of the categories to the performance indicator criteria and circle the appropriate color in the designated column on Attachment 8.1.6.11.

**PI&R - CORRECTIVE ACTION PROGRAM STATUS**

7. Determine if a trend exists by comparing the current month's data with the previous month's data.
- If the performance indicator average age is the same as the previous month, then circle — in the trend column on Attachment 8.1.6.11.
  - If the performance indicator average age is increasing from the previous month, then circle ↓ in the trend column on Attachment 8.1.6.11.
  - If the performance indicator average age is decreasing from the previous month, then circle ↑ in the trend column on Attachment 8.1.6.11.

The printed Business Objects reports should be maintained with Attachment 8.1.6.11 as supporting documentation.

**Notes**

ATTACHMENT 8.1.6.12  
Page 1 of 2  
**PI&R - TRAINING FEEDBACK**

**Purpose**

This Indicator monitors the quality of Emergency Preparedness Classroom Training in meeting the needs of the ERO.

**Definition**

Test Results:

Number of tests passed \_\_\_\_\_ divided by the number of tests taken \_\_\_\_\_ x 100 = \_\_\_\_\_ %

Green -  $\geq 90\%$

Yellow - 80% - 89%

Red -  $< 80\%$

Favorable Management Feedback form from TAP-500, "Observation of Classroom and Laboratory Training":

Green -  $<10\%$  Expectations not met

Yellow - 10% - 30% Expectations not met

Red -  $>30\%$  Expectations not met

Student Feedback:

Number of strongly disagrees (SDs) divided by the total number of opportunities to indicate SD.

Instructor (questions 1-6)

Green -  $<10\%$  SD

Yellow - 10% - 30% SD

Red -  $>30\%$  SD

Materials (questions 7-9)

Green -  $<10\%$  SD

Yellow - 10% - 30% SD

Red -  $>30\%$  SD

Time/Facilities (questions 10-12)

Green -  $<10\%$  SD

Yellow - 10% - 30% SD

Red -  $>30\%$  SD

Monthly indicator is the lowest value in either category. The category of the lowest value is noted in the analysis portion of the report.

ATTACHMENT 8.1.6.12  
Page 2 of 2  
**PI&R - TRAINING FEEDBACK**

**Documentation**

Test results

Favorable Management Feedback form from TAP-500, "Observation of Classroom and Laboratory Training"

Student feedback forms.

**Notes**



**ERO KEY POSITION MATRIX**

NEI 99-02 rev 0 Definition of KEY ERO Members	HBR ERO position fulfilling this definition	Basis	DEP type drill required to receive credit for participation?	Comments
Control Room Shift Manager (Emergency Director) – Supervision of reactor operations, responsible for classification, notification, and determination of protective action recommendations	Control Room – Site Emergency Coordinator (CR - SEC)	The CR – SEC has the responsibility of overall command and control in the CR and has the responsibility to notify the state and local authorities within the required time.	Yes	Reference PLP-007, “Robinson Emergency Plan,” Sections 5.3 and 5.4. Because the CR-SEC has responsibility for both of these tasks, they will only be counted once in the participation indicator.
Control Room Shift Communicator – provides initial offsite (state/local) notification		The CR-SEC compiles the data and approves the ENF		
Technical Support Center Senior Manager – Management of plant operations/corporate resources	Technical Support Center - Site Emergency Coordinator (TSC - SEC)	The TSC – SEC has the responsibility for all events being conducted outside the Control Room and within the Protected Area. The TSC-SEC is the lead position for the TSC.	Yes	Reference PLP-007, “Robinson Emergency Plan,” Section 5.3.

**ERO KEY POSITION MATRIX**

Technical Support Center Key Operations Support	Plant Operations Director (POD)	The POD is either a currently licensed or previously licensed SRO. They are the link between the Control Room and the TSC. They are an advisor to the TSC – SEC.	Yes	Reference PLP-007, “Robinson Emergency Plan,” Section 5.3.
Technical Support Center Key Radiological Controls – Radiological effluent and environs monitoring, assessment and dose projections	Radiological Control Director (RCD)	The RCD is responsible for Key Radiological Controls – Radiological effluent and environs monitoring, assessment and dose projections within the Protected Area.	Yes	Reference PLP-007, “Robinson Emergency Plan,” Section 5.3.
Technical Support Center Key TSC Communicator – provides offsite (state/local) notification	NRC Emergency Communicator (NRC – EC)	The communicator to an offsite agency within the TSC is to the NRC by the NRC Emergency Communicator. An Operator or someone in Operations Training who would be familiar with the operation of the plant staffs this position.	Yes	Reference PLP-007, “Robinson Emergency Plan,” Section 5.3.

ATTACHMENT 8.1.6.13  
Page 3 of 4  
**ERO KEY POSITION MATRIX**

Technical Support Center Key Technical Support	Technical Analysis Director (TAD)	The TAD advises the TSC – SEC and has a staff of Engineers who are the Accident Assessment Team (Electrical, Mechanical, and Reactor)	Yes	Reference PLP-007, “Robinson Emergency Plan,” Section 5.3.
Emergency Operations Facility Senior Manager – Management of corporate resources	Emergency Response Manager (ERM)	The Emergency Response Manager is standing in for the Plant Vice-President during declared events. This individual has overall plant responsibility and the remainder of the company at their disposal if requested through corporate.	Yes	Reference PLP-007, “Robinson Emergency Plan,” Section 5.3.
Emergency Operations Facility Key Protective Measures – Radiological effluent and environs monitoring, assessment, and dose projections	Radiological Control Manager (RCM)	The RCM has the overall responsibility to advise the ERM of radiological conditions. The RCM has the DPTL and the EMTL working for them.	Yes	Reference PLP-007, “Robinson Emergency Plan,” Section 5.3.

ATTACHMENT 8.1.6.13  
Page 4 of 4  
**ERO KEY POSITION MATRIX**

Emergency Operations Facility Key EOF Communicator – provides offsite (state/local) notification	Emergency Communicator (EC)	In the EOF, the EC is responsible for accurate and timely completion of the notification form and notification to the offsite agencies within the required time.	Yes	Reference PLP-007, “Robinson Emergency Plan,” Section 5.3.
Operational Support Center Key OSC Operations Manager	Operational Support Center Leader (OSCL)	The OSCL is responsible for coordination and activation of Damage Control and Search and Rescue missions.	No	Reference PLP-007, “Robinson Emergency Plan,” Section 5.3.

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

PLANT OPERATING MANUAL

VOLUME 2

PART 5

## **EPCLA-02**

# ***EMERGENCY ACTION LEVEL USER'S GUIDE***

REVISION 10

**SUMMARY OF CHANGES**  
PRR 80388

Step/Section	Description of change
Entire Procedure	Converted to WORD 2000
8.2.4	There are no records generated by this procedure.
8.2.3.34	Added a clarifying statement as follows: The release of all the Freon – Type R-22 Refrigerant from a single train of equipment in the Control Room HVAC Room has been evaluated per Engineering Calculation RNP-M/HVAC-1016. This evaluation has determined that the release of all the R-22 Refrigerant from a single train does <b>NOT</b> represent the release of a toxic gas into a vital area for the purposes of EAL classification.

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### 8.2.1 PURPOSE

1. To provide instructions for the use of the Emergency Action Levels (EALs) and to describe the transition from the EAL flowpaths to this procedure.

### 8.2.2 RESPONSIBILITIES

N/A

### 8.2.3 INSTRUCTIONS

1. Declarations
  - a. General Emergency: **IF** at any time during progression through the EAL flowpath, a General Emergency declaration is warranted, **THEN** the Site Emergency Coordinator/Superintendent Shift Operations (SEC/SSO) is to immediately declare a General Emergency **AND** carry out the actions specified by the procedure.
  - b. **IF** an event (other than a General Emergency) is warranted, **THEN** the SEC/SSO is to continue through the flowpath, after noting it on the "EAL STATUS Board."
  - c. The highest indicated level will be declared upon completion of the flowpath.
2. Entering the Flowpath
  - a. The flowpath can be entered at the discretion of the SEC/SSO.
  - b. It is appropriate for the Superintendent Shift Operations (SSO) to defer entry into the flowpath early in an event in order to direct his attention and expertise to ensuring proper diagnosis by the operating shift and that proper actions are being taken to combat the casualty. However, because timely event classification is essential to protecting the public, once the SSO is satisfied the response is adequate for the situation, he should immediately enter the flowpath to classify the event and initiate any required augmentation.



### 8.2.3.2 (Continued)

- c. It is the expectation that the time between exceeding an EAL and declaration of the event will not exceed 15 minutes unless extraordinary conditions prevail. (CR 97-02306) For EAL steps with time requirements, the 15 minute expectation for declaration begins after the stated time. For example, the loss of E-1 and E-2 for greater than 15 minutes. The Site Area Emergency EAL would not be satisfied until the 15 minutes expires. (CR 13050)
3. Entry Point into the Flowpath
- a. The EAL flowpath should be entered at the first step of EAL-1. Re-evaluation of conditions may require entry into EAL-2 at entry point X, but only when directed by steps within EAL-2 or the final step of EAL-1.
  - b. Once entered, the flowpath should be completed unless a General Emergency is identified during the progression through the flowpath.
    - For a General Emergency immediately implement EPCLA-01, Emergency Control.
    - The Unusual Event Matrix should be reviewed if no event above Alert is identified.
4. Progression through the Flowpath
- a. Once the flowpath is entered, progression should continue swiftly until directed to declare an event. This will ensure:
    - Timely classification of the event
    - Timely notification of necessary personnel and agencies
    - Timely completion of any necessary protective actions
  - b. During the progression through the flowpath, the latest available information should be used in answering the questions if current information is not available.

#### 8.2.3.4 (Continued)

- c. The single exception to this method of classification and notification is the declaration of a General Emergency. **IF**, at any time, including during the development of the notification or the progression through an emergency procedure, **THEN** the SEC/SSO becomes aware of information which would clearly result in a General Emergency declaration, he should revisit the EAL flowpath to confirm that a declaration of a General Emergency is warranted.
  - d. **IF** the declaration of a General Emergency is warranted, **THEN** the SEC/SSO should declare/proceed as directed by the EAL flowpath. Any notifications in progress or in preparation should be amended to the extent practical and the development of protective action recommendations should begin immediately. **IF** the declaration is **NOT** warranted, **THEN** the SEC/SSO should return to the point at which he left the classification/notification process.
  - e. Early in EAL-1, the SEC/SSO is instructed to "Monitor Critical Safety Function Status Trees (CSFSTs) for Information Only." This is done to ensure the SEC/SSO is aware of changing critical parameters which may affect the EALs. In no case should SPDS be reset unless directed by the EOP network. The question "Integrity CSF-4 RED or ORANGE" will be answered yes whenever it is so indicated by SPDS or by manual determination. The Shift Technical Advisor may be consulted if CSFST status is unclear.
5. Verifying Validity of Information
- a. Only valid indications should be used for determination of EALs.
  - b. **IF** the validity of instrumentation is suspect, **THEN** attempts should be made to ensure the information used is accurate.

### 8.2.3 (Continued)

#### 6. Bypassing of Individual Event Groups

- a. Throughout EAL-1 and 2, several questions are asked for the purpose of determining the need to address specific events (Confirmed Fire (YES/NO), ATWS (YES/NO)).
- b. These blocks enable the user to bypass sections of the flowpath which do not pertain to the event which has occurred or is occurring.
- c. **IF**, for the examples given, an ATWS or Fire has occurred, **THEN** the block should be answered YES the first time if it is encountered during the progression through the flowpath.
- d. On subsequent re-evaluations, the ATWS decision block should be answered YES until control rods have been fully inserted or the reactor has been shut down. The decision block should also be answered YES if another ATWS occurs.
- e. On subsequent re-evaluations, the Fire Confirmed decision block should be answered YES until the fire has been extinguished and a thorough damage assessment has been completed which concludes that the potential for damage to safety-related equipment has been eliminated.

#### 7. Fission Product Barrier Analysis (Overview)

- a. The first steps of EAL-1 are conducting an analysis of the principal barriers to radiation and radiological releases.
  - fuel cladding
  - reactor coolant system (RCS)
  - containment

#### 8.2.3.7 (Continued)

- b. The criteria for establishing an emergency are the level of challenge (potential or actual damage) to these barriers and the number of barriers concurrently under challenge.
- c. A challenge to one or more barriers generally is identified through instrument readings, periodic sampling, and monitoring of CSFSTs.
- d. Deterioration of a single barrier usually indicates an "Alert" condition, two barriers under challenge a "Site Area Emergency", and three barriers a "General Emergency".
- e. As the SEC/SSO moves through the barrier analysis steps, he is making the following assessments:
  - First, a determination of whether the Fuel Fission Product Barrier (FPB) has been breached, is jeopardized, or is intact. The SEC/SSO then indicates the status of the Fuel FPB on the "FPB Status Board", which is located at the top of the EAL-1 flowpath. He will put an **X** or check mark next to the appropriate term (Intact, Jeopardized or Breached) in the Fuel FPB column.
  - Second, a determination of whether the RCS FPB has been breached, is jeopardized, or is intact. The SEC/SSO then indicates the status of the RCS FPB on the "FPB Status Board". He will put an **X** or check mark next to the appropriate term (Intact, Jeopardized or Breached) in the RCS FPB column.

#### 8.2.3.7.e (Continued)

- Third, a determination of whether the Containment FPB has been breached, is jeopardized, or is intact. The SEC/SSO then indicates the status of the Containment FPB on the "FPB Status Board". He will put an **X** or check mark next to the appropriate term (Intact, Jeopardized or Breached) in the Containment FPB column.
- **IF** three FPBs were indicated as Breached/Jeopardized, **THEN** a General Emergency is declared and the SEC/SSO is directed to EPCLA-01, Emergency Control.
- **IF** two FPBs were indicated as Breached/Jeopardized, **THEN** the SEC/SSO will put an **X** or check mark to "Site Area Emergency" on the EAL Status Board located in the upper right corner of the EAL-2 AND then continue on in EAL-1.
- **IF** one FPB is indicated as Breached/Jeopardized, **THEN** the SEC/SSO will put an **X** or check mark next to "Alert" on the EAL Status Board located in the upper right corner of EAL-2 AND then continue on in EAL-1.

### 8.2.3 (Continued)

#### 8. EAL-1 Grid A-4: R-9 Rad Monitor

- a. It may be prudent to isolate letdown prior to either of the listed criteria being exceeded as a precautionary measure to reduce exposure to personnel working in the Auxiliary Building.
- b. **IF** letdown is isolated, **THEN** R-9 will not be monitoring actual RCS conditions.
- c. Because R-9 is the only real time indicator of mechanical fuel damage, the SEC should consider trending R-9 response to determine if R-9 is projected to exceed either of the listed criteria prior to discretionary isolation.

#### 9. EAL-1 Grid A-5: R-11 and R-12 Rad Monitors Aligned to CV

Rad Monitors R-11 and R-12 are not valid indicators of fuel condition if they are not aligned to the CV. Rad Monitors R-11 and R-12 are not valid indicators of fuel breach if RCS leakage into containment is not present.

##### a. R-11 Rad Monitor Greater Than 1M CPM

**IF** the response is Yes, **THEN** a determination must be made as to whether or not R-12 has exceeded its maximum value prior to declaring a fuel fission product barrier breach.

An increase of this magnitude indicates that an RCS leak and a potential Fuel Breach has occurred. This action level is based upon a breach of a fission product barrier(s), such as RCS or a combination of RCS and small fuel clad breach.

Based on the sensitivity studies performed in EC49849, Rad monitor R-11 reached EAL threshold value of 1M cpm based on a reactor coolant system leak of 1 gpm and 0.1% failed fuel. Fuel pins with known degraded clad producing a steady-state RCS concentration below Technical Specifications, could result in spikes in the RCS with respect to isotopic inventories indicative of 0.1% failed fuel.

#### 8.2.3.9.a (Continued)

Rad monitor R-11 indication is very sensitive to RCS leakage and should be used primarily as an indicator of RCS breach into containment. It is possible that RCS leakage on its own will produce an indication of 1M cpm on R-11. It may also be used as an indicator of RCS leakage in combination with very small amounts of fuel damage. Other indicators should be used in conjunction with R-11 to indicate fuel breach.

#### b. R-12 Rad Monitor Greater Than 40K CPM

An increase of this magnitude indicates that an RCS leak and a potential Fuel Breach has occurred. This action level is based upon a breach of a fission product barrier, such as RCS or a combination of RCS and small fuel clad breach.

Based on the sensitivity studies performed for EC49489, Rad monitor R-12 reached EAL threshold value of 40K cpm based on a reactor coolant system leak of 10 gpm and 0.1% failed fuel. Fuel pins with known degraded clad producing a steady state RCS concentration below Technical Specifications could result in spikes in the RCS with respect to isotopic inventories indicative of 0.1% failed fuel. R-12 readings should be used primarily as an indicator of RCS breach into containment and providing overlapping indication for R-11. It may also be used as an indicator of potential fuel damage in combination with RCS leakage.

#### 10. EAL-1 Grid A-9: RCS leakage Greater Than Charging Capability

- a. RCS leakage is defined in EPCLA-00, Attachment 10.1, Definitions. The charging capability of 3 charging pumps for evaluation purposes is 225 gpm.
- b. **IF** only 2 charging pumps are available, **THEN** this decision block should be answered YES for leakage > 150 gpm.
- c. **IF** only 1 charging pump is available, **THEN** this decision block should be answered YES for leakage > 75 gpm.
- d. A charging pump may be technically inoperable **AND** still considered as a part of charging capability if it is available to provide flow.

### 8.2.3 (Continued)

11. EAL-1 Grid A-10: CV Pressure Less Than 2 psig

- a. CV Pressure is considered normal when less than 2 psig.

12. EAL-1 Grid A-11, R-15 Rad Monitor Greater Than 8K CPM

An increase in magnitude indicates that an RCS leak into the secondary side is occurring (steam generator tube leak). This action level is based upon a breach of a fission product barrier(s), such as RCS.

Based on the sensitivity studies performed for EC 49849, R-15 will trigger this action level based on a primary to secondary leak of 50 gpm with no fuel and 415 cfm air ejector flow.

13. EAL-1 Grid D-4: Phase A or CV Ventilation Isolation Initiated or Required.

- a. The purpose of this decision block is to determine if events are in progress, or have occurred, of such significance that a Phase A or CV Ventilation Isolation signal is appropriate to mitigate the consequences of the event(s).
- b. **IF** an automatic or manual CV Ventilation Isolation signal has been initiated, **THEN** this decision block should be answered YES.
- c. **IF** an automatic or manual Phase A Isolation signal has been initiated, **THEN** this decision block should be answered YES.
- d. **IF** conditions are known to exist which should have resulted in the initiation of an automatic CV Ventilation or Phase A isolation actuation, but did not, **THEN** the decision block should also be answered YES.
- e. **IF** a spurious signal is initiated, **THEN** the block should be answered YES.



### 8.2.3 (Continued)

14. EAL-1 Grid A-12, R-31A, B, or C Rad Monitors Greater Than 1 mRem/hr

An increase of this magnitude indicates that an RCS leak into the secondary side is occurring (steam generator tube leak) and some potential fuel damage has occurred. This action level is based upon a breach of a fission product barrier(s), such as RCS or RCS and fuel breach.

Based on the sensitivity studies performed in EC 49849, R-31A, B, or C will trigger this action level based on a 10 gpm primary to secondary leak and 1% fuel clad damage.

R-19s are not used since they isolate on an SI signal and their alarm setpoint reflects a lower amount of leakage. R-15 and R-31s do not isolate and therefore will be available to the evaluator to determine release rates.

15. EAL-1 Grid E-5: Pathway Exists from CV Atmosphere to Environment
- a. This decision block can only be reached if an event requiring a Phase A **OR** CV Ventilation Isolation signal has occurred **OR** if one of the other fission product barriers (fuel or RCS) has been breached or jeopardized.
  - b. This decision block determines whether or not there is an open, uncontrollable pathway for fission products within the air space or that may be contained within the liquid in the CV sump to find their way to the outside atmosphere, to the lake, or to an open system outside the CV.

#### 8.2.3.15 (Continued)

- c. For a ruptured steam generator, the decision block should be answered NO. During tube rupture events the EOP Network provides direction for isolation of the steam generator and will ultimately facilitate closure of the steam and feed lines. Unless attempts to close valves in these lines as directed by the EOP Network are unsuccessful, the CV should be considered intact and controllable even though a release may be occurring.
- d. For a faulted steam generator, the decision block should be answered NO. Although the rapid depressurization from a faulted steam generator may result in a safety injection signal, there is no pathway for communication of the CV atmosphere with the outside atmosphere.
- e. For a ruptured, faulted steam generator, **OR** a situation in which one steam generator is faulted **AND** another is ruptured, this decision block should be answered NO. The combination of grid locations D-5 and E-6 will provide a decision path for determining the status of CV in this situation.
- f. For failure of a CV Ventilation Isolation valve to close:
  - The decision block should be answered NO if the redundant CV Ventilation Isolation valve in the flow path does close and isolate the flow path;
  - The decision block should be answered YES if both redundant valves in a flow path fail to close **OR** if the one which closes is not capable of isolating the flow path.

#### 8.2.3.15 (Continued)

- g. For failure of a Phase A isolation valve to close:
  - The decision block should be answered NO if the redundant valve closes and isolates the pathway **OR** if the pathway goes into a closed system outside CV which is intact.
  - Examples of closed pathways includes RMS-1, 2, 3, and 4 and the CVCS hold-up tanks, unless they are known to be faulted.
  - The decision block should be answered YES in the event that both Phase A isolation valves fail to close on a system that is open outside the CV.
  - Examples of open systems include WD-1723 and 1728, the CV sump valves to the Waste Hold-up Tank which is vented to the Auxiliary Building ventilation system
  - The decision block should be answered YES in the event that both valves fail to close and a normally closed system is known to be faulted both inside and outside CV.
- h. For an unisolable service water leak inside CV, the decision block should be answered YES.
- i. In determining if a pathway exists the SSO/SEC should consider plant conditions and indications. Normally closed systems inside or outside CV should not be assumed to be faulted unless there are indications that they are faulted or they are known to be faulted.
- j. In determining the status of isolation valves, ERFIS indication and local panel indication are often available.

#### 8.2.3.15 (Continued)

- k. Area and process radiation monitors, such as R-4, R-14 C, D, or E, provide indication when fission products from the CV atmosphere find their way to the outside environment. **IF** these monitors are unavailable, **THEN** dose rate surveys taken locally can provide the basis for a determination that fission products have found a pathway from the CV atmosphere.
  - l. In general, a YES determination at this decision block requires:
    - Knowledge **OR** evidence of an open system inside the CV.
    - CV isolation valves which fail to close.
    - Knowledge **OR** evidence of an open system outside CV such that the pathway for the gases or sump water inside the CV to reach the outside environment exists.
    - Knowledge or evidence can be provided by plant conditions, local or remote indications, and process or area radiation monitors.
16. EAL-1 Grid D-5: Nonisolable Steamline or Feedline Leak Outside CV
- a. Any leakage outside CV should prompt a YES answer at this decision block no matter how small the leak may be.
    - pinhole, weep, valve leakage

#### 8.2.3.16 (Continued)

- b. The leak should **NOT** be considered unisolable until local manual efforts to isolate the leak have been initiated **AND** have proven unsuccessful **OR** been deemed impractical due to the hazardous environment, a lack of needed tools or equipment, or inaccessibility of the leak for repair.
- c. Attempts at manual isolation should be initiated promptly and expedited consistent with radiological considerations and should be given a high priority when a release is in progress through the leak.

#### 17. EAL-1 Grid D-10: ATWS

- a. The first time the EAL flowchart is reviewed, any previous ATWS should be considered in this decision block.
- b. For subsequent progressions through the EAL flowchart, this decision block should be answered YES until the reactor is in Mode 3 or lower. (AR # 43473)

#### 18. EAL-1 Grid D-12: Fire Confirmed

- a. Indication of the existence of a fire may be received in the Control Room by fire alarm or by telephone, PA, or radio notification from any individual on the plant site.
- b. The SEC/SSO must confirm the existence of an actual fire prior to answering decision block D-12. This may involve questioning an individual in the case of a verbal notification or dispatching a qualified individual to the scene in the case of a fire alarm.

#### 8.2.3.18 (Continued)

- c. FP-001, Fire Emergency, prescribes actions to be taken upon notification of a fire by any means and provides for the timely response to ensure proper confirmation of the fire. IF no flame is present OR reported but smoke is reported from cable trays or conduits, THEN this should be considered adequate confirmation.
  - d. WHEN adequate information has been received from the scene, THEN decision block D-12 may be answered.
19. EAL-1 Grid D-13: Fire Has Potential to Affect Safety Related Equipment
- a. This decision block should be answered based on information received from the scene of the fire. The Emergency Diesel Generators are included for this decision.
  - b. WHEN a fire is confirmed to exist in a fire zone which contains safety related equipment, THEN the SEC/SSO must ascertain whether the magnitude and location of the fire is such that it could potentially render the safety related equipment inoperable.
  - c. A small fire on an Emergency Diesel Generator (EDG) exhaust manifold that does not have the potential to affect EDG operability AND that could be easily put out using a fire extinguisher would NOT be considered a fire that has potential to affect safety related equipment.

#### 8.2.3.19 (Continued)

- d. IF the fire has potential to render safety related equipment inoperable, THEN this decision block should be answered "yes" unless all of the following conditions are met:
- The nature and location of the fire are known, including what component(s) are involved in the fire and what is burning;
  - The component(s) involved in the fire are not safety-related;
  - The fire is confined to those components or that location by the existence of ample space or a barrier; and
  - No safety-related power, control, or communications cables OR their power sources are involved in the fire.
- e. The fire can be quickly extinguished by the individual at the scene using fire extinguishers available at the scene OR has already been extinguished;
- f. No indications of spurious or abnormal equipment operation are observed at the scene or in the Control Room;
- g. The SEC/SSO is expected to utilize the collective knowledge and judgment of watch-standers in assessing the safety-related status of equipment involved in the fire.

### 8.2.3 (Continued)

20. EAL-1 Grid D-13: Complete Loss of Any ESF Function in Table 2 Due to Fire
- a. Complete loss means loss of manual and automatic capability to provide the function.
  - b. IF control power is lost but pumps can be manually started and flow delivered despite the fire, THEN the function is NOT completely lost.
  - c. When evaluating the effects of a fire on the Plant, the intent is for the SEC/SSO to consider equipment which is rendered inoperable by the fire and determine if all capability for any particular ESF function is lost. The following examples are provided:
    - A fire which damaged all three Safety Injection (SI) pumps would result in declaration of a Site Area Emergency. Also, if only one pump was damaged by fire, but neither of the other two pumps were available for some other reason, the same condition would exist (all SI capability lost).
    - A fire which removed the ability supply fuel oil to the EDG Day tanks should be viewed as an alert due to the fire affecting safety related equipment without a total loss of capability.
21. EAL-1 Grid D-14: Unplanned Loss of **Greater Than or Equal to 7** Annunciator Panels for >15 Minutes
- a. RTGB annunciator panels include those on the RTGB and does not include the panels whose response is dictated by APP-036, or APP-044.
  - b. IF only the audible annunciation function is lost, THEN the decision block should be answered NO.



### 8.2.3 (Continued)

#### 22. EAL-1 Grid D-14: Plant Transient in Progress

- a. Trips, runbacks, SI actuations and losses of electric power are all considered plant transients.
- b. IF these events have occurred either manually or automatically, THEN the transient is considered in progress until the RCS AND secondary have been stabilized.
- c. Normal power changes of >10% are considered to be transients and are considered in progress until the power change can be curtailed AND primary and secondary status has been stabilized.

#### 23. EAL-1 Grid E-14, D-15: ERFIS Data Available

- a. The trending AND alarm function of ERFIS should be considered when determining the impact on plant operations of a loss of annunciators.
- b. If the ERFIS system is out of service, the block should be answered "NO".

### 8.2.3 (Continued)

24. EAL-1 Grid G-4: E-1 and E-2 De-Energized for Greater than 15 Minutes
- a. IF E-1 AND E-2 have been de-energized for greater than 15 minutes, THEN this block should be answered YES.
  - b. IF E-1 AND E-2 are both de-energized, but have NOT yet been de-energized for greater than 15 minutes, THEN the decision block should be answered "NO".
  - c. IF E-1 AND E-2 have remained de-energized for greater than 15 minutes, but are currently energized, THEN the decision block should be answered "YES" unless a Site Area Emergency has already been declared due to the loss of E-1 and E-2. However, in the case where the buses are currently energized, it is appropriate to declare and downgrade in the same notification.
25. EAL-1 Grid G-5: MCC-A and MCC-B De-Energized for Greater Than 15 Minutes
- a. MCC-A and MCC-B are considered to be de-energized when the voltage has decreased to the level that the instrument bus inverter on each MCC has tripped off due to low input voltage.
  - b. This decision block should be answered in a similar manner to E-1 and E-2 in step 8.2.3.21.
26. EAL-1 Grid G-7: Complete Loss of Any Function Listed in Table 3
- a. A "Complete Loss" of any of these functions is defined as a total loss of the function needed in an effort to stabilize the plant in hot shutdown, cold shutdown, OR both.

#### 8.2.3.26 (Continued)

- b. Example:  
A complete loss of Service Water (SW) capability might result from a failure of all four SW pumps, a catastrophic piping failure which depressurized both the North and South SW headers, or a sabotage event which isolated all four SW pumps and could not be immediately reversed. The key issue here is whether or not the loss of capability being considered will cause an inability to achieve Hot or Cold S/D and maintain that condition safely.
- c. In the case of a complete loss of Emergency Buses E-1 and E-2, several of the functions in Table 3 will be lost until power is restored. Therefore, this step is redundant to prior steps in the flowpath which address a loss of power. As such, the criteria established for a loss of these busses greater than 15 minutes should be applied here also and the function should not be considered completely lost (due to loss of power) until power has been lost for greater than 15 minutes.
- d. The short-term loss of these functions during the time the emergency diesels are sequencing loads following a blackout should NOT be considered a complete loss of the function.

#### 8.2.3.26 (Continued)

- e. Specifically, the following list describes the components, the loss of which, constitutes complete loss of selected functions:
- Charging Capability - Complete loss requires all three (3) charging pumps or all flow paths for make-up to the RCS.
  - Boration Capability - Complete loss requires all automatic flow paths AND the manual boration path.
  - RCS Pressure Control Capability - Loss of all pressurizer heaters or loss of all pressurizer spray flow paths and PORV's constitutes a complete loss of RCS pressure control capability:
- f. Loss of all heaters due to a low pressurizer level or a level instrument failure does not constitute a complete loss unless the heaters remain unavailable after level is re-established or the level instrument failure repair efforts have been completed.
- g. Loss of all heaters due to a loss of offsite power does not constitute a complete loss unless EPP-21, Energizing Pressurizer Heaters from Emergency Busses, is not effective in re-energizing the heaters or heaters cannot be re-energized when normal power is restored.
- h. Because the plant was not designed with enough pressurizer heaters to maintain RCS pressure in a LOCA event, the inability to maintain RCS pressure in a LOCA event does not constitute a complete loss of RCS pressure control.
- i. IF a Pressurizer PORV has been isolated due to leakage but can be made available by opening its associated block valve, THEN a complete loss of RCS pressure control does not exist.

### 8.2.3.26 (Continued)

- j. Table 3 has been provided so the SEC/SSO can quickly determine which functions are required for a shutdown. The table provides a list of the required functions and indicates whether they are required for hot shutdown or cold shutdown. The SEC/SSO should mark the function(s) that have been completely lost and continue on in the flowpath.
  - k. IF the function has an "X" marked in both columns, THEN it is required for hot shutdown AND cold shutdown.
  - l. IF a function has an "X" in only the hot shutdown column, THEN it is required only for hot shutdown.
  - m. IF a function has an "X" in only the cold shutdown column, THEN it is required only for cold shutdown.
  - n. IF the function(s) is required for hot shutdown, and RHR is not providing shutdown cooling THEN the SEC/SSO indicates a "Site Area Emergency" on the EAL Status Board and continues on the flowpath.
  - o. With RCS temperature being controlled by the Residual Heat Removal System, the functions required for hot shutdown column do not apply. IF the function(s) is required for cold shutdown only, THEN the SEC/SSO indicates an "Alert" on the EAL Status Board and continues on in the flowpath.
27. EAL-1 Grid G-8: Security Event
- a. WHEN the Control Room is made aware of any security threat, THEN the Security force will be mobilized to investigate and validate the situation. This process will result in an event declaration, if appropriate, and this event declaration will establish the level of emergency class.

### 8.2.3.27 (Continued)

- b. The Superintendent Shift Operations (SSO) or his designee must determine if physical control of the plant is lost OR its loss is imminent.
- c. Imminent loss of physical control would NOT merit declaration of a General Emergency.

#### 28. EAL-1 Grid G-11: Release in Progress

- a. This decision block refers to a release of radioactive material from the New or Spent Fuel Building.
- b. It does not include normal liquid and gaseous releases, CV purges, OR CV pressure reliefs. These are addressed elsewhere.

<b>NOTE:</b> The following guidance is for EAL-2.
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#### 29. EAL-2 Grid B-3: Any Rad Monitor in Table 4 in Alarm

- a. This decision block asks if any of the RAD monitors in Table 4 are in alarm. Table 4 consists of the radiation monitors used for dose projections. They are listed by their radiation monitor numbers so the SEC/SSO can easily determine which monitors to assess at this point in the flowpath.
- b. IF any of the Rad Monitors are in alarm, THEN the SEC/SSO should mark that Rad Monitor on the Table AND continue on in the flowpath.
  - IF the current reading for any of the Rad Monitors listed in Table 5 is greater than value listed in Column 6 of Table 5, THEN an "Alert" is indicated on the EAL Status Board and the SEC/SSO continues on in the flowpath.

#### 8.2.3.29 (Continued)

- c. The multipliers used in the calculation are based on the normal setpoints for these monitors. IF the setpoints have been reduced below the normal values, as described in OMM-014, Radiation Monitor Setpoints, THEN the basis for the Alert call is no longer valid. In this event, an Alert call should NOT be made.
  - d. Table 5 is referred to again when evaluating the Unusual Event Matrix. In this case, if any monitor is greater than the value specified in Column 4, an Unusual Event is declared.
30. EAL-2 Grid F-6: Lake Level Normal
- a. Normal lake level is from 220.7 ft. to 221.5 ft. above mean seal level (MSL).
31. Grid F-10 (F-11): Sustained Lower Wind Speeds Greater than 90 (100) MPH.
- a. Sustained winds are those which are reported as sustained from the National Weather Service or meteorological center OR are observed on plant meteorological tower data for greater than 5 minutes continuously.
    - The plant meteorological tower reports wind speed as a 15 minute average. By virtue of this, if the speed is reported in excess of the limit on ERFIS/EDS the condition is satisfied.
  - b. In the event that information specifically for the Robinson Plant is not available, information reported for the nearest reliable location in the Hartsville - Florence vicinity from any of the sources listed in EPRAD-00, Radiological Assessments and Consequences should be used in answering this decision block.

#### 8.2.3.31 (Continued)

- c. In the absence of any data from these sources the block should be answered NO.

#### 32. EAL-2 Grid F-12: Any Explosion Affecting Plant Operation

- a. An explosion is a rapid and violent chemical reaction releasing large quantities of energy.
- b. This decision block should be answered YES if an explosion has occurred AND any of the following have occurred as a result of the explosion:
  - Access is lost to equipment which must be operated to maintain stable plant conditions.
  - Damage to safety-related equipment which impairs its performance.
  - Personnel injury has resulted in the shift complement not being maintained.
- c. An explosion does NOT include catastrophic failures of electrical breakers or compressed gas bottles.

#### 33. EAL-2 Grid F-14: Safety-Related Equipment or Structure Affected

- a. This decision block should be answered YES if any function listed in Table 2 OR Table 3 of EAL-1 is completely lost as a consequence of the explosion/aircraft crash/missile impact.



### 8.2.3 (Continued)

34. EAL-2 Grid H-2: Uncontrolled or Unplanned Release of Toxic or Flammable Gas into Vital Area

- a. The following is a list of toxic and flammable gases and asphyxiants that are normally stored in bulk quantities within the Protected and Vital areas. While this list is not all-inclusive, it is provided to aid in classification; the MSDS identifier is provided for information.

Name of Toxic or Flammable Gas

ACETYLENE (1, 2)

OXYGEN (1)

PROPANE (1, 2)

HYDROGEN (1)

AMMONIA (1, 2)

P-10 GAS, used in portal monitors (1)

ETHANOLAMINE (1, 2)

METHOXYPROLAMINE (1, 2)

DIMETHYLAMINE (1, 2)

- \* Oxygen itself is not flammable, but is treated as a flammable gas because its presence increases the flammability of materials.

1 - Flammable

2 - Toxic

- b. When evaluating the effects of a release of toxic or flammable gas, this decision block should be answered YES if the gases listed are released in an uncontrolled or unplanned manner.

#### 8.2.3.34 (Continued)

- c. For evolutions such as surveillance testing, freeze-sealing and leak-checking, it is expected that small quantities may be released; these small anticipated releases should NOT result in a YES answer.
- d. Asphyxiants such as those listed below displace oxygen and, as such, can become toxic in large enough quantities.

##### Asphyxiant Gas

NITROGEN

ARGON

CARBON DIOXIDE

HELIUM

FREON - GENETRON DICHLORODIFLUOROMETHANE

FREON - R-22, CHLORODIFLUOROMETHANE

- The release of all the Freon – Type R-22 Refrigerant from a single train of equipment in the Control Room HVAC Room has been evaluated per Engineering Calculation RNP-M/HVAC-1016. This evaluation has determined that the release of all the R-22 Refrigerant from a single train does **NOT** represent the release of a toxic gas into a vital area for the purposes of EAL classification.
- e. When evaluating the "loss of access" decision block, the SEC/SSO must consider the type and quantity of gas released, the volume into which it is released, AND the flow path of the ventilation system in service.
  - For flammable gases, where any spark could conceivably trigger a fire or explosion which could damage vital equipment, a YES answer is warranted for potentially flammable concentrations.

#### 8.2.3.34 (Continued)

- For toxic gases and asphyxiants, the concern is a loss of access for personnel to manipulate vital equipment in support of normal or EOP procedures. Positive indications, by sample, or Superintendent Shift Operations (SSO) judgment should be used to verify atmosphere is oxygen deficient prior to answering Yes. IF access to any vital area is lost, THEN the decision block should be answered YES. Vital areas are listed in Attachment 8.2.5.1, Vital Areas.

35. EAL-2 Grid H-3: Lack of Access Causes Complete Loss of any Function in Table 2 or 3

- a. IF access to a vital area(s) is lost such that manual actions required to support any function cannot be performed, THEN this decision block should be answered YES.

36. UE Matrix Item E3:

- a. Loss of both EDGs means that the diesels are not capable of providing AC power to the Emergency Busses. Events caused by fires should be evaluated for its potential to affect safety related equipment.

37. UE Matrix Item A1:

- a. IF the setpoints have been reduced below the normal values, as described in OMM-014, Radiation Monitor Setpoints, THEN the basis for the Unusual Event call is no longer valid. In this event, a UE call should NOT be made.

38. UE Matrix Item B4

- a. While R-9 can detect changes in RCS activity, it can not always determine the origin of the radioactive material in the RCS. If conditions exist that could give false indication of fuel failure, a sample should be used for verification. The instruction in UE matrix B1, B2, or B3 should be used once sample results are obtained. If previous plant conditions exist such as confirmed fuel clad leakage, declaration should occur without delaying for sample.

### 8.2.3 (Continued)

#### 39. UE Matrix Item G3

- a. Credibility must be established when notification of a threat is received.
  - b. If time permits, Security should be contacted to verify the credibility of the threat by contacting the appropriate local, state, or federal agency.
  - c. If time does not permit, the Superintendent-Shift Operations or Site Emergency Coordinator must determine credibility using the best available information.
  - d. Credible threats include the following:
    - Events that are in progress are considered to be credible.
    - Validated notifications reported by State or Federal agencies. These notifications are considered valid following verification that the notification was made by the agency specified.
  - e. For potentially credible threats from calls that do not originate from State or Federal agencies, the determination is not as straightforward. In these cases, judgment must be used. The caller should be questioned using the technique similar to that used for a bomb threat. The following information should be obtained for evaluating credibility:
    - Ask the caller's name.
    - Ask the caller the reason for the call.
    - Is the caller rational/sober?
    - Does the caller know when the event will occur?
- Does the caller know specific information concerning the plant?

### 8.2.3 (Continued)

#### 40. Downgrading an Emergency

- a. Downgrading of an emergency can be accomplished by declaring the lower emergency class whenever the plant conditions improve to satisfy the affected emergency action levels.
- b. The following guidelines apply when downgrading an Emergency:
  - IF the Position of Emergency Response Manager is activated, THEN he should be consulted before downgrading occurs, although the final decision rests with the Site Emergency Coordinator.
  - IF the NRC Director of Site Operations position is activated, THEN he should be consulted before downgrading occurs, although the final decision rests with the Site Emergency Coordinator.
  - IF offsite protective action recommendations have been made, THEN the Site Emergency Coordinator shall consult with the Emergency Response Manager, if the position is activated, AND consult with state and county authorities, prior to downgrading. It is recommended that any offsite protective action recommendations be completed prior to downgrading of a General Emergency.
  - For Alert or higher classifications, unless the conditions causing emergency action levels are very quickly resolved (less than approximately 30 minutes), downgrading should not occur until after the Technical Support Center is activated.
  - IF the process of activating the TSC is in progress, THEN downgrading should NOT occur until after TSC activation.

41. Recovery actions should follow guidance provided within PLP-007, Robinson Emergency Plan, Section on Recovery.

#### 8.2.4 **RECORDS**

There are no records generated by this procedure.

#### 8.2.5 **ATTACHMENTS**

8.2.5.1 Vital Areas

ATTACHMENT 8.2.5.1  
Page 1 of 1  
**VITAL AREAS**

PAP WEST

CAS - Central Alarm Station  
Access Control  
Mechanical/Electrical Room  
PAP (TSC/EOF) Diesel

PAP EAST

SAS - Secondary Alarm Station

RADIATION CONTROL AREAS

RHR Pump Room  
BIT Room  
Auxiliary Building  
Containment Building  
Fuel Handling Building - Gas Decay Tank Room  
Spent Fuel Pit  
New Fuel Building  
SFP Heat Exchanger and Pump Area

OTHER AREAS

AFW Pump Room  
E1/E2, Battery Room, Safeguards and Relay Rack Rooms  
HVAC Equipment Room for the Unit 2 Control Room  
Old Unit #1 Cable Spread Room  
Unit #2 Control Room  
CCW Surge Tank Room  
Service Water Intake Building