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101 - 101 - EMERGENCY DIRECTOR (ED)-TSC EMERGENCY PLAN-POSITION SPECIFIC PROCEDURE

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AD45

# PROCEDURE COVER SHEET

PPL SUSQUEHANNA, LLC		NUCLEAR DEPARTMENT PROCEDURE	
<b>TSC EMERGENCY DIRECTOR:</b> Emergency Plan-Position Specific Procedure			EP-PS-101 Revision 19 Page 1 of 4
<b>QUALITY CLASSIFICATION:</b> <input type="checkbox"/> QA Program <input checked="" type="checkbox"/> Non-QA Program		<b>APPROVAL CLASSIFICATION:</b> <input type="checkbox"/> Plant <input type="checkbox"/> Non-Plant <input checked="" type="checkbox"/> Instruction	
<b>EFFECTIVE DATE:</b> <u>6-26-2003</u> <b>PERIODIC REVIEW FREQUENCY:</b> <u>Two Years</u> <b>PERIODIC REVIEW DUE DATE:</b> <u>6-26-2005</u>			
<b>RECOMMENDED REVIEWS:</b> All			
<b>Procedure Owner:</b> <u>Nuclear Emergency Planning</u> <b>Responsible Supervisor:</b> <u>Vice President-Nuclear Operations</u> <b>Responsible FUM:</b> <u>Supv.-Nuclear Emergency Planning</u> <b>Responsible Approver:</b> <u>Vice President-Nuclear Operations</u>			

**EMERGENCY DIRECTOR (ED)-TSC:**      Emergency Plan-Position Specific Procedure

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**WHEN:**      Emergency Support Center (TSC) is activated

**HOW NOTIFIED:**      Phoned by Station Operator  
After hours: Paged

**REPORT TO:**      Vice President-Nuclear Operations

**WHERE TO REPORT:**      Control Room/TSC

**OVERALL DUTY:**

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Manage the Technical Support Center (TSC) so that the plant responds to the emergency, people are protected, and the center processes information to those who need to know. Once the EOF has taken over these communications and radiological functions, concentrate exclusively on returning the plant to a safe condition.

<b><u>MAJOR TASKS:</u></b>	<b><u>TAB:</u></b>	<b><u>REVISION:</u></b>
Assemble and brief TSC staff, then take over the task of managing the emergency.	TAB A	10
Reclassify the emergency as conditions change.	TAB B	8
Make sure information is being communicated to company, public, and government personnel.	TAB C	6
Make protective action recommendations to safeguard public and measures to protect personnel working in or near the plant.	TAB D	10
Review Severe Accident Management (SAM), strategies.	TAB E	4
Manage turnover to the next shift.	TAB F	4
Turn over Emergency Management to the EOF.	TAB G	4
When emergency is terminated, disband the TSC staff.	TAB H	0
Determine if there is a non-routine Radiological Release in Progress.	TAB I	0

**SUPPORTING INFORMATION:**

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**TAB:**

Emergency Telephone Instructions	TAB 1
Emergency Organization	TAB 2
Logkeeping	TAB 3
Brief Non-Technical Descriptions of EAL	TAB 4
Turnover/Briefing Checklists:	TAB 5
<ul style="list-style-type: none"><li>• Control Room/TSC Turnover Checklist</li><li>• TSC/EOF Turnover Checklist</li><li>• TSC/EOF Briefing Checklist</li></ul>	
Emergency Classification	TAB 6
Public Protective Action Recommendation Guide	TAB 7
PPL Emergency Personnel Dose Assessment and Protective Action Recommendation (PAR) Guide	TAB 8
TSC Staff Responsibilities	TAB 9
Restoration Organization Guidelines	TAB 10
Emergency Forms	TAB 11
<ul style="list-style-type: none"><li>• TSC Data Sheet</li><li>• Potassium Iodine (KI) Tracking Form</li><li>• Emergency Exposure Extensions</li><li>• Emergency Exposure Extension Request</li><li>• PAR State Notification Form</li></ul>	
Primary Containment and RVP Venting Strategy	TAB 12

**REFERENCES:**

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ICRP Publication 28, The Principles and General Procedures for Handling Emergency and Accidental Exposures of Workers. International Commission on Radiation Protection. (1978)

NCRP Report 39, Basic Radiation Protection Criteria, National Council on Radiation Protection and Measurements. (1971)

NCRP Report 55, Protection of the Thyroid Gland in the Event of Releases of Radioiodine, National Council on Radiation Protection and Measurements. (1977)

SSES Emergency Plan

EPA Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (EPA 400-R-92-001 May 1992)

NDAP-QA-1190, Nuclear Department Radiation Protection Program and Policies

NDAP-QA-1191, ALARA Program and Policy

IE Notice, 83-28

NUMARC Graded Response Study

NUREG-0654, Planning Standards and Evaluation Criteria

NUREG-0731, Guidelines for Utility Management Structure and Technical Resources, September 1980

SP-00-308, Emergency Medical Response, Search/Rescue

**MAJOR TASK:**

Assemble and brief TSC staff, then take over the task of managing the emergency.

**SPECIFIC TASKS:**

**HOW:**

**NOTE (1):**

The Operations Coordinator may perform Steps 1 through 3b (as defined by parenthesis) if the TSC Emergency Director has assumed the role of the ED in the Control Room.

**NOTE (2):**

If the ED did NOT take over Control of the Emergency proceed with Step 1.

1. Determine plant status.

1a. Report to Control Room. \_\_\_\_\_

1b. Receive turnover from Shift Manager. \_\_\_\_\_

**HELP**

**CONTROL ROOM/TSC  
TURNOVER CHECKLIST  
See TAB 5**

1c. Determine:

(1) Resources or actions required by Operations. \_\_\_\_\_

(2) In progress plant activities. \_\_\_\_\_

2. Assume overall management of the emergency.

2a. Verify key Coordinators are ready to assume emergency functions required for activation:

(1) Operations Coordinator \_\_\_\_\_

(2) Damage Control Team coordinator \_\_\_\_\_

(3) Rad Protection Coordinator \_\_\_\_\_

(4) TSC Coordinator \_\_\_\_\_

**SPECIFIC TASKS:**

**HOW:**

(5) TSC NRC Communicator \_\_\_\_\_

(6) Security Coordinator \_\_\_\_\_

**HELP**

**Emergency Organization  
 See TAB 2**

**NOTE:**

The Operations Coordinator may perform step 2b as defined in ( ). However, only a qualified ED can relieve the Control Room ED of overall management of the emergency.

2b. Contact the Shift Manager and relieve Control Room of overall management of emergency, (*Ops Coordinator notify Control Room ED of readiness of TSC to take turnover.*)

(1) Offsite Notification (TSC Communicator) \_\_\_\_\_

(2) Dose Projection (Rad Protection Coordinator) \_\_\_\_\_

(3) Emergency Teams (Damage Control Team Coordinator) \_\_\_\_\_

(4) Emergency Classification (Technical Support and Operations Coordinators) \_\_\_\_\_

(5) Protective Action Recommendations (Rad Protection Coordinator). \_\_\_\_\_

2c. If the Operations Coordinator prepared the TSC for activation while you were filling the role of Control Room ED, activate the TSC.

**SPECIFIC TASKS:**

**HOW:**

- |  |   |
|--|---|
| <p>3. Perform external notifications.</p> <p>4. Direct the Security or Admin Coordinators to verify 60 and 90 minute NERO members respond.</p> <p>5. Manage the emergency.</p> | <p>2d. Make a Plant PA announcement when the "TSC is in control of the emergency."</p> <p><b>NOTE (1):</b><br/>The Plant Page located on the ED Desk is Local to the TSC. The Plant-wide PA is located on either wall in the TSC.</p> <p><b>NOTE (2):</b><br/>This responsibility can be delegated to the TSC Communicator.</p> <p>2e. Brief TSC personnel on emergency situation.</p> <p>2f. Review classification of emergency (TAB B).</p> <p>2g. Review radiological conditions and dose projections if applicable (TAB D).</p> <p>3a. Notify Public Information Manager of plant status.</p> <p>3b. Notify Senior Vice President-Generation and Chief Nuclear Officer, or VP - Nuclear Operations. Request they notify other managers as appropriate.</p> <p>5a. Reclassify the emergency as conditions change (TAB B).</p> <p>5b. Communicate information concerning emergency (TAB C).</p> |
|--|---|



**SPECIFIC TASKS:**

**HOW:**

5c. Initiate radioactive release monitoring to support Public Protective Action Recommendation (TAB D). \_\_\_\_\_

5d. Make Protective Action Recommendation as required (TAB D). \_\_\_\_\_

5e. Notify the Control Room to initiate accountability.

**NOTE (1):**

Accountability required at Site Area Emergency or higher classification (consider habitability of accountability locations). Rad Protection and Security Coordinators responsible to implement.

**NOTE (2):**

Once accountability is ordered, it must be maintained until either the event is terminated or an evacuation is ordered.

5f. Initiate RCA Evacuation when plant conditions dictate or:

(1) When accountability is initiated. \_\_\_\_\_

5g. Initiate Site Evacuation of non-essential personnel when site conditions dictate or when a Site or General Emergency is declared AND accountability is complete. \_\_\_\_\_

**SPECIFIC TASKS:**

**HOW:**

**NOTE:**

**Essential personnel:**

- Operations
- Maintenance
- Health Physics
- Chemistry
- Security
- NERO Members

- (1) Instruct Security Coordinator to perform site evacuation. \_\_\_\_\_
- (2) If the TSG-is in control of the Emergency, direct both TSC Communicators to notify offsite agencies of the evacuation initiation. \_\_\_\_\_
- (3) If the EOF is in control of the emergency, direct the TSC E-Plan Communicator to notify the EOF Communicator of the evacuation so that the EOF can notify offsite agencies. \_\_\_\_\_
- (4) Direct the TSC NRC Communicator to notify the NRC of the evacuation initiation. \_\_\_\_\_

5h. Monitor plant status. \_\_\_\_\_

**NOTE:**

**Ops Coordinator responsible to maintain.**

5i. Establish plant priorities. \_\_\_\_\_

**NOTE:**

**Ops Coordinator responsibility.**

5j. Initiate corrective actions for plant priorities. \_\_\_\_\_

**SPECIFIC TASKS:**

**HOW:**

**NOTE:**

**Damage Control Team Coordinator responsible to implement actions.**

- 5k. Ensure proper resources are available to combat emergency. \_\_\_\_\_

**NOTE:**

**Damage Control Team and Admin. Coordinators responsibilities.**

- 5l. Initiate core damage assessment. \_\_\_\_\_

**NOTE:**

**Tech Support Coordinator responsibility. Requires PASS sample - Chemistry Coordinator.**

- 5m. Initiate 24-hour shift coverage for emergency positions. \_\_\_\_\_

**NOTE:**

**Admin. Coordinator-responsible.**

- 5n. Support emergency medical response, search/rescue. \_\_\_\_\_

**NOTE:**

**Reference SP-00-308, (Emergency Medical Response, Search/Rescue)**

6. Request Federal assistance to augment NERO.

- 6a. When federal assistance is required, requests should be coordinated with PEMA and/or DEP/BRP. \_\_\_\_\_

**SPECIFIC TASKS:**

**HOW:**

7. If required, invoke the provisions of 10CFR 50.54X.

- 7a. In accordance with 10CFR 50.54X, operation outside the Technical Specifications shall only be taken in an emergency:
- (1) When action is immediately needed to protect the public health and safety and no action consistent with license conditions and Technical Specifications that can provide adequate or equivalent protection is immediately apparent.
  - (2) Direct the Operations Coordinator to have the Shift Manager implement the provisions of OP-AD-001 Section 6.2.6.

**MAJOR TASK:**

Reclassify the emergency as conditions change.

**SPECIFIC TASKS:**

**HOW:**

- |  |  |       |
|--|--|-------|
| 1. Evaluate latest information.                                      | 1a. Consult lead Coordinators for updated information.                               |       |
|  | (1) Radiation Protection Coordinator for radiological release.                       | _____ |
|  | (2) Operations Coordinator on plant status.  | _____ |
|  | (3) Technical Support Coordinator over status of problem identification/ resolution. | _____ |
|  | (4) Security Coordinator for security event.   | _____ |
|  | (5) Damage Control Team Coordinator for repair status.                               | _____ |
| 2. If significant changes have occurred, review EAL classifications. | 2a. Review EAL classifications.  | _____ |

**HELP**

**Emergency Classification**  
**See TAB 6**

- |   |       |
|---|-------|
| 2b. Find emergency action levels on matrix closest to actual plant condition. | _____ |
|---|-------|

**CAUTION:**

**If you upgrade to a General Emergency, you must make a Protective Action Recommendation within 15 minutes (see TAB D).**

- |  |       |
|--|-------|
| 2c. Refer to EAL bases document for additional guidance. | _____ |
|--|-------|

**SPECIFIC TASKS:**

**HOW:**

3. Choose the most appropriate emergency action level.

2d. If no EAL's are applicable to the current situation be sure to review the General Criteria EAL 4. \_\_\_\_\_

3a. If upgrading, go to Specific Task #4 of this tab, "Document and communicate the new classification." \_\_\_\_\_

3b. If downgrading from a Site Area Emergency or General Emergency you must get concurrence from:  
(1) NRC \_\_\_\_\_  
(2) DEP/BRP \_\_\_\_\_  
(3) PPL Sr. VP or VP-Nuclear Operations \_\_\_\_\_

3c. If terminating the emergency, go to TAB G. \_\_\_\_\_

4. Document and communicate the new classification.

4a. Document in log: \_\_\_\_\_

(1) Time \_\_\_\_\_  
(2) Date \_\_\_\_\_  
(3) Emergency level \_\_\_\_\_

4b. Instruct either TSC Communicator to announce classification over page. \_\_\_\_\_

4c. Instruct both TSC Communicators to initiate notifications (Local/State, NRC). \_\_\_\_\_

**NOTE:**

**PEMA, LCEMA and CCDPS must be notified within 15 minutes after classification.**

**NRC should be notified as soon as possible, but within 60 minutes.**

**SPECIFIC TASKS:**

**HOW:**

		4d.	At Site Area or General Emergency, contact the Shift Manager to initiate accountability actions if not already done.
			<p><b>NOTE (1):</b>            Accountability is optional at the alert level. It is required at the Site Area Emergency or General Emergency.</p> <p><b>NOTE (2):</b>            Once accountability is initiated it must be maintained until the event is terminated or a site evacuation is initiated.</p>
5.	Review PAR Guidance in anticipation of escalation to a General Emergency.	5a.	Go to TAB D.
6.	When conditions warrant, declare a General Emergency.	6a.	<p>Within 15 minutes of declaration of a General Emergency, perform the following</p> <p>(1) Ensure notifications via ENR form to PEMA, LCEMA, and CCDPS are initiated by the TSC Communicator.</p> <p>(2) Determine appropriate PAR. Go to TAB D.</p>
7.	Continue to evaluate current PAR and revise as appropriate based on increasing dose levels.	7a.	Go to TAB D.

**MAJOR TASK:**

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Make sure information is being communicated to company, public, and government personnel. This includes calls you make directly.

**SPECIFIC TASKS:**

**HOW:**

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1. Assure offsite agencies and internal management are notified.

- 1a. Direct the TSC E-Plan Communicator to complete the Emergency Notification Report using guidance provided in the "Emergency Action Level Reference Manual."
- 

**HELP**

**Brief Non-Technical  
Descriptions of EAL  
See TAB 4**

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- 1b. If the TSC is in control of the Emergency, direct both of the TSC Communicators to notify offsite organizations when a site evacuation of non-essential personnel is initiated.
- 

- 1c. If the EOF is in control, direct the E-Plan Communicator to notify the EOF Communicator to notify offsite organizations when a site evacuation is initiated.
- 

- 1d. If the EOF is in control, the TSC NRC Communicator will inform the NRC when a site evacuation is initiated.
- 

**HELP**

**Emergency Telephone  
Instructions  
See TAB 1**

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**SPECIFIC TASKS:**

**HOW:**

- |   |  |
|---|--|
| 2. Assure the PAR Form is transmitted to DEP/BRP.   | 2a. If offsite radiological release is in progress, the Rad Protection Coordinator informs DEP/BRP with Protective Action Recommendation Form. _____   |
| 3. Provide static updates on the emergency to TSC staff.                                    | _____  |
| 4. Periodically meet with lead TSC Coordinators to discuss information about the emergency. | 4a. Conduct routine meetings approximately every 30 to 60 minutes to:<br>(1) Set up action items. _____<br>(2) Set priorities. _____<br>(3) Clarify responsibilities. _____<br>(4) Discuss long-range requirements. _____<br>(5) Allocate resources. _____ |
| <hr/> <b>HELP</b> <hr/> <b>TSC Staff Responsibilities</b><br><b>See TAB 11</b> <hr/>        |  |
| <hr/> <b>HELP</b> <hr/> <b>TSC/EOF BRIEFING CHECKLIST</b><br><b>See TAB 5</b> <hr/>         |  |
| 5. Present emergency status and TSC priorities during EOF conference call.                  | 5a. Set conference call by dialing 199 on your CTN phone. _____  |
| <b>NOTE:</b><br><b>Emergency Telephone Directory</b><br><b>Centrex System Conferencing.</b> |  |
| 6. Approve news releases before being issued by PIM.  | 5b. Provide information concerning:<br>(1) Plant status. _____<br>(2) Radiological conditions. _____<br>(3) Classification level. _____  |

**SPECIFIC TASKS:**

**HOW:**

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7. Approve Emergency Notification Reports prior to transmission.

8. Approve Protective Action Recommendation Forms prior to transmission.

8a. Approval by Emergency Director required only if Public Protective Action Recommendation is made.

**MAJOR TASK:**

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Make Protective Action Recommendations to safeguard the public and measures to protect personnel working at or near the plant.

**SPECIFIC TASKS:**

**HOW:**

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1. Evaluate the current and projected plant and off-site radiological information.

- 1a. Obtain and evaluate information:

- (1) Plant information and prognosis from the Ops Coordinator, Damage Control Team Coordination and the TSC Coordinator. \_\_\_\_\_
- (2) Radiological information from the Radiation Protection Coordinator: \_\_\_\_\_
  - (a) Field readings
  - (b) Dose projections
  - (c) Release Rates
  - (d) Meteorological conditions
  - (e) Issuance of Potassium Iodide

2. Review PAR Guidance in anticipation of escalation to a General Emergency.

- 2a. Use the following guidance:

- (1) Assess plant conditions and determine the most likely Emergency Action Level that could lead to declaration of a General Emergency. \_\_\_\_\_
- (2) Using the above conditions, review the PAR flowchart to determine the likely PAR for the General Emergency condition. \_\_\_\_\_

**SPECIFIC TASKS:**

**HOW:**

- (3) Review the likely PAR with any state or federal officials present in the Emergency Response Facility to resolve any potential issues should the PAR later need to be issued or revised.

**HELP**

**Protective Action  
Recommendation Guide  
See TAB 7**

3. When a General Emergency is declared determine appropriate PAR and communicate the PAR within 15 minutes to the Senior State Official.

- 3a. Go to TAB 7 and determine PAR.  
3b. Discuss recommendation with Recovery Manager, if feasible.  
3c. Communicate PAR to Senior State Official. Phone number is 717 651-2148.

**HELP**

**PAR State Notification Form  
See TAB 11**

4. Continue to evaluate current PAR and revise as appropriate based on increasing dose levels.

- 4a. Communicate revised PAR to Senior State Official. Phone number is 717 651-2148.

**HELP**

**PAR State Notification Form  
See TAB 11**

**HELP**

**Protective Action  
Recommendation Guide  
See TAB 7**

SPECIFIC TASKS:	HOW:
5. Assess if a protective action recommendation beyond ten miles is appropriate.	5a. Instruct the RPC to provide estimates of dose projections for distances greater than ten miles. _____
	5b. Consult with Operations and Technical Support Coordinators to verify dose projection estimates are consistent with plant conditions. _____
	5c. Insure PAR's have been made for distances up to ten miles. _____
	5d. Recommend a PAR rounding out the distance to the nearest five mile increment until dose projections estimates are less than 1 REM TEDE or 5 REM CEDE. _____
	5e. Communicate the PAR to the Senior State Official using the PAR State Notification Form. Phone number is 717 651-2148. _____
6. Continue monitoring on-site release(s) to protect plant personnel and anticipate possible offsite conditions. _____	
7. When required, initiate a Local Area RCA, or Site Evacuation.	7a. <u>Local Area Evacuation Guidelines:</u> _____  Evacuate personnel from an area or building when: (1) CAM on high alarm (2) ARM on high alarm (3) Fire alarm (4) Uncontrolled toxic material in area (5) Any condition hazardous to personnel if they remain in the area.

**SPECIFIC TASKS:**

**HOW:**

- |   |  |
|---|--|
| <p>8. Initiate habitability survey of all accountability areas.</p><br><br><br><br><br><br><br><br><br><br><p>9. Initiate accountability.</p> | <p>7b. <b><u>RCA Evacuation:</u></b> _____<br/>Evacuate personnel from the RCA when:<br/>(1) Alert declared<br/>(2) Accountability initiated<br/>(3) Any condition hazardous to personnel who remain in the RCA.</p> <p>7c. <b><u>Site Evacuation:</u></b> _____<br/>Non-essential personnel evacuated from the site when:<br/>(1) Site or General Emergency declared and accountability completed.<br/>(2) Any condition hazardous to personnel who remain on site exists.</p> <p>8a. Ensure the Radiation Protection Coordinator has completed surveys of accountability areas. _____<br/><b>NOTE:</b><br/>If an accountability area is uninhabitable, consult with Health Physics on the necessity of establishing a remote assembly, (holding), area. (West Building or the Energy Information Center.)</p> <p>9a. Direct the Operations Coordinator to contact the Control Room to initiate the Accountability Alert Tone. _____</p> <p>9b. Notify the Security Coordinator that accountability has been initiated. _____</p> |
|---|--|

**SPECIFIC TASKS:**

**HOW:**

**NOTE (1):**

Accountability should be completed within thirty minutes from time it was called for.

**NOTE (2):**

Once accountability is initiated it must be maintained until event termination or site evacuation.

10. Evacuate personnel when required.

10a. Local Area Evacuation, ensure:

- (1) INDIA Team(s) dispatched to assess and mitigate the emergency condition(s). \_\_\_\_\_
- (2) Request non-essential personnel remain out of the area until emergency condition(s) terminated. \_\_\_\_\_

10b. RCA Evacuation, ensure:

- (1) INDIA Team(s) dispatched to assess and mitigate the emergency condition(s). \_\_\_\_\_
- (2) Have personnel remain out of the RCA until emergency condition(s) are terminated. \_\_\_\_\_

10c. SITE EVACUATION

- (1) Direct the Administrative Coordinator (or Security Coordinator if the Admin Coordinator has not arrived) to identify essential personnel.

**SPECIFIC TASKS:**

**HOW:**

**NOTE:**

**Essential personnel are defined in the Admin and Security Coordinator procedures.**

11. Designate an area for essential personnel to assemble if not assembled in the OSC or TSC.

11a. Have essential personnel assemble at designated work or holding areas such as the Maintenance and I&C shops.

12. Evacuate non-essential personnel from the site.

12a. When accountability is completed, direct the Security Coordinator to initiate evacuation of non-essential personnel from the site.

**NOTE:**

**It may be prudent to have non-essential personnel report to the Remote Assembly Areas if additional contamination or other monitoring is required.**

12b. If the TSC is in control, direct both of the TSC Communicators to initiate an ENR form to notify offsite agencies of the site evacuation.

12c. If the EOF is in control, direct the TSC E-Plan Communicator to notify the EOF Communicator to initiate the ENR form to notify offsite agencies of the site evacuation initiation.

12d. If the EOF is in control, direct the TSC NRC Communicator to notify the NRC of the initiation of site evacuation.



**SPECIFIC TASKS:**

**HOW:**

13. Direct Health Physics to establish ongoing habitability monitoring of essential work locations and holding areas.

14. Assess manpower needs.

15. Adhere to administrative exposure limits for plant personnel.

16. Apply emergency exposure considerations when required.

14a. Assess current conditions to determine if additional manpower should be called in. \_\_\_\_\_

15a. Follow administrative exposure objectives for plant personnel. \_\_\_\_\_

16a. For doses expected to exceed 4,000 mrem, apply emergency exposure considerations. \_\_\_\_\_

**HELP**

**PPL Emergency Personnel  
Dose Assessment and  
Protective Action  
Recommendation Guide  
See TAB 8**

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**MAJOR TASK:**

Determine if there is a non-routine Radiological Release in Progress.

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**SPECIFIC TASKS:**

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**HOW:**

1. Determine if there is a non-routine Radiological release in progress.

- 1a. There is a release in progress if ANY of the following are true:
- (1) Any release rates above Technical Specifications or Technical Requirements Manual limits, OR
  - (2) Entry into the Emergency Plan for the listed EALs:
    - 3 fuel Clad Degradation
    - 15 Radiological Effluents
    - 17 Spent Fuel Related Incident
    - 18 Steam Line Break
  - (3) Any radiological release to the environment, detected by effluent monitors or environmental monitoring, above normal levels and is attributable to a declared event, OR

**NOTE:**

Normal levels are the highest reading in the last 24 hours prior to the emergency, excluding the current peak value.

- (4) If the Shift Manager/ED/RM has reason to believe that an Unmonitored release is in progress even though plant indications are otherwise normal, OR
- (5) Entry into the E Plan under EAL 21 Dry Fuel Storage or EAL 16 Security Event, AND the Dry Storage Cask has been breached.

**SPECIFIC TASKS:**

**HOW:**

2. If there is a non-routine Radiological release in progress, ensure performance of the following actions.

(6) Initiation of SBT System due to Radiological release.

- 2a. Provide that information to the TSC Communicators to transmit the information to offsite agencies.

- 2b. Direct Health Physics personnel to initiate dose calculations and field monitoring.