

**FPL**

ST. LUCIE PLANT

EMERGENCY PLAN IMPLEMENTING PROCEDURE

SAFETY RELATED

Procedure No.

EPIP-08

Current Revision No.

6

Effective Date

09/02/03

Title:

OFF-SITE NOTIFICATIONS AND PROTECTIVE ACTION RECOMMENDATIONS

Responsible Department: **EMERGENCY PLANNING**

REVISION SUMMARY:

Revision 6 – Incorporated PCR 03-2272 for CR 03-2568 to revise State Notification form. Delete supplemental data sheet. Revise instructions for completing State form. Improve guidance relative to changing PARs (RIS 2003-12). (J.R. Walker, 08/29/03)

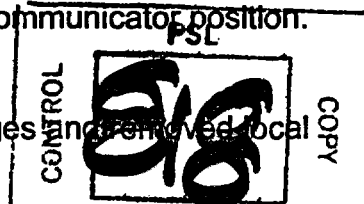
AND

Incorporated PCR 03-1637 for MA 03-04-082 to incorporate shift communicator position. (A. Terezakis, 08/06/03)

Revision 5 – Clarified duties, made editorial / administrative changes and removed local government radio. (J. R. Walker, 07/26/02)

Revision 4 – Clarified instructions regarding notification of rapidly degrading events. Clarified stability class instructions. Made administrative/editorial changes. (J.R. Walker, 10/11/01)

Revision 3 – **THIS PROCEDURE HAS BEEN COMPLETELY REWRITTEN.** Improved instructions for notification by clarifying responsibilities & revising notification checklists, improved PAR instructions by creating separate attachment, relocated procedure information, added instructions for alternate MET data, added caution regarding classification of multiple events, added note to Control Room appendix identifying attachments necessary to complete notification checklists, and made editorial and administrative changes. (J. R. Walker, 06/11/01)



PROCEDURE PRODUCTION

Revision 0	FRG Review Date 05/30/00	Approved By R. G. West Plant General Manager	Approval Date 05/31/00	S <u> </u> OPS
Revision 6	FRG Review Date 08/28/03	Approved By R.E. Rose Plant General Manager N/A Designated Approver N/A Designated Approver (Minor Correction)	Approval Date 08/29/03	DATE DOCT PROCEDURE DOCN EPIP-08 SYS COM COMPLETED ITM 6

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1.0 PURPOSE

1.1 Discussion

- 1.** This procedure provides information and instructions for undertaking notifications of the State Warning Point (SWP) and the Nuclear Regulatory Commission (NRC) and for determination of Protective Action Recommendations (PARS).
- 2.** This procedure is for use in the Control Room, Technical Support Center (TSC) and Emergency Operations Facility (EOF).
- 3.** Upon declaration of an emergency classification the Nuclear Plant Supervisor (NPS) assumes the duties of the Emergency Coordinator (EC). The EC has initial responsibility for off-site notifications and PARs.
- 4.** Once the EOF is operational and proper turnover has been conducted, the Recovery Manager (RM) assumes responsibility for off-site notifications and PARs from the EC.
- 5.** At an Alert or higher level emergency, communications with the NRC transition to an open phone line from the TSC and the EOF (at a Site Area Emergency of higher level emergency).
- 6.** The following table illustrates which facility has a responsibility for Classification, Notification or PARs.

	Control Room (X until EC function transfers to the TSC)	TSC (X when operational)	EOF (X when operational)
Classifications	X transfers →	X	
Notifications	X transfers →	X transfers →	X
PARs	X transfers →	X transfers →	X

7. Off-site Notification

A. Purpose of Off-Site Notifications

FPL is required to notify off-site agencies in the event of any emergency that could threaten the health and safety of the public. These notifications provide an early warning to agencies responsible for public protection.

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1.1 Discussion (continued)

7. (continued)

NOTE

The State Department of Health (Bureau of Radiation Control) may not have their office staffed on a 24-hour basis. In the event that they do not answer the Hot Ring Down (HRD) telephone, the State Warning Point (SWP) assumes responsibility for notifying their duty officer.

B. Who Shall Be Notified

- State Division of Emergency Management
- State Department of Health (Bureau of Radiation Control)
- St. Lucie County Emergency Operations Center
- Martin County Emergency Operations Center
- NRC

1. State and County Notification

- a. State and local agencies are notified by using the Hot Ring Down (HRD) telephone. The HRD rings the State Warning Point (SWP). The SWP puts the other agencies on line and reduces the need for individual calls.
- b. ¶4 After the State Coordinating Officer (SCO) arrives in the EOF, he / she can transfer "NET Control" to the EOF. When this occurs, the Recovery Manager's PAR Briefing becomes the primary notification method for the State and Counties. The Florida Nuclear Plant Emergency Notification Form (form similar to Attachment 1) shall still be completed and provided to the SCO or his / her designee in the EOF. The EOP HRD Communicator should no longer contact the State Warning Point (SWP).

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1.1 Discussion (continued)

7. B. (continued)

2. NRC Notification

- a. The NRC is notified using the Emergency Notification System (ENS) telephone.**
- b. NRC notifications occur through an open line of communication in the TSC and, when operational, the EOF.**

C. Emergency Follow-up Information Requests from State and local agencies.

- 1. Incoming calls should come via the SWP over the HRD phone. If the HRD is inoperable, the SWP may use commercial telephone or ESATCOM (emergency satellite phone). If an off-site authority contacts the plant without going through the SWP, request that they contact the SWP. SWP shall verify that the agency calling is a risk county or the Department of Health (DOH) and shall notify other county and state agencies of the updated information, thus reducing the number of calls that may be directed to the plant.**
- 2. Long, detailed explanations of plant systems or reactor theory should be avoided. If prompted for this kind of information by the State Duty Officer, he / she should be referred to the Nuclear Division Duty Officer (NDDO).**
- 3. If the State or one of the Counties provides either the TSC or EOF with new or pertinent information, Then bring that information to the attention of the EC or EC Assistant / Logkeeper in the TSC or the RM or the RM OPS Advisor / Logkeeper in the EOF.**

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1.1 Discussion (continued)

8. Protective Action Recommendations

- A.** Protective actions for the general public are ordinarily NOT required prior to declaration of a General Emergency. It is possible however, that due to unusually stable and constant meteorological conditions, protective actions could be recommended at a Site Area Emergency based on projected doses. This is the exception rather than the rule.

Protective actions for the general public are required to be recommended if a General Emergency is declared. Initial Protective Action Recommendations (PARs) are normally based on plant conditions. This would NOT be true if the General Emergency was declared based on off-site dose (either measured or projected) or a Security Emergency (per the Security Plan). The predetermined minimum PARs (based on plant conditions) are as given below.

B. General Emergency - Minimum PARs

- 1.** In any case where a GENERAL EMERGENCY has been declared, the minimum PAR shall be:

Shelter all people within a 2-mile radius and out to 5 miles in the sectors affected. The sectors affected are at least three, the downwind sector plus the two adjacent sectors.
- 2.** If a GENERAL EMERGENCY has been declared due to actual or projected severe core damage, the minimum PAR shall be:

Evacuate all people within a 2-mile radius from the plant and out to 5 miles in the sectors affected. Shelter all people in the remaining sectors from 2 to 5 miles and from 5 to 10 miles from the plant.
- 3.** If a GENERAL EMERGENCY has been declared due to loss of physical control of the plant to intruders, including the Control Room or any other area(s) vital to the operation of the reactor system (as defined in the Security Plan), the minimum PAR shall be:

Evacuate all people within a 2-mile radius from the plant and out to 5 miles in the sectors affected. Shelter all people in the remaining sectors from 2 to 5 miles and from 5 to 10 miles from the plant.

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1.1 Discussion (continued)

8. (continued)

- C.** Once a release of radioactive material occurs, dose assessment should be utilized when evaluating PARs. The final determination of the PAR should consider all available information including off-site dose projections, plant conditions and field monitoring data. The most conservative recommendation shall be made.
- D.** If it is anticipated that a PAR threshold will be exceeded, DO NOT wait until the threshold is exceeded to make that PAR.
- E.** ¶₁₂ Conditions (plant information, dose projections and field monitoring results) are to be continually assessed and PARs expanded, as necessary, to ensure that adequate (most conservative) PARs are issued.
- F.** ¶₁₂ Previously issued PARs, unless found to be less conservative, are to remain in effect until the threat is fully under control and the event is being de-escalated.
- G.** ¶₁₂ Only State and County officials can implement, change and/or terminate protective actions.

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2.0 REFERENCES / RECORDS REQUIRED / COMMITMENT DOCUMENTS

NOTE

One or more of the following symbols may be used in this procedure:

- § Indicates a Regulatory commitment made by Technical Specifications, Condition of License, Audit, LER, Bulletin, Operating Experience, License Renewal, etc. and shall NOT be revised without Facility Review Group review and Plant General Manager approval.
- ¶ Indicates a management directive, vendor recommendation, plant practice or other non-regulatory commitment that should NOT be revised without consultation with the plant staff.
- Ψ Indicates a step that requires a sign off on a data sheet.

2.1 References

1. St. Lucie Plant Updated Final Safety Analysis Report (UFSAR) Unit 1 and Unit 2
2. St. Lucie Plant Technical Specifications Unit 1 and Unit 2
3. §₁ St. Lucie Plant Radiological Emergency Plan (E-Plan)
4. E-Plan Implementing Procedures (EPIP 00 – 13)
5. St. Lucie Plant Emergency Response Directory (ERD)
6. QI-17-PSL-1, Quality Assurance Records

2.2 Records Required

1. All PAR worksheets and notifications forms (all attachments) shall be maintained in plant files in accordance with QI-17-PSL-1.

2.3 Commitment Documents

1. ¶₁ PMAI PM96-04-165, "ITR 96-006" (Unusual Event Declared Due to Dropped Rod)
2. ¶₂ PMAI PM96-09-185, Condition Report CR-96-1750 (Off-site Notification Using Commercial Phone)
3. ¶₃ NRC Inspection Report 91-01, Closure of IFIs 89-31-03 and 89-31-01
4. ¶₄ Condition Report CR-00-0428 (Evaluated Exercise Critique)

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<p>2.3 Commitment Documents (continued)</p> <p>5. ¶₆ PMAI PM96-05-233 (Off-site Notification Process)</p> <p>6. ¶₇ PMAI PM99-09-016 (PARs Based on FMT Data, Completion of NRC Notification Form)</p> <p>7. ¶₈ NUREG-1022, Event Reporting Guidelines 10 CFR 50.72 and 50.73, Section 4.2.4, ENS Event Notification Worksheet (NRC Form 361).</p> <p>8. ¶₉ Condition Reports CR-01-0726 and CR-01-0742 (NOUEs Associated with SDC During SL1-17 Outage)</p> <p>9. ¶₁₀ Condition Report CR-01-0389 (Alternate Met Data Source)</p> <p>10. ¶₁₁ Condition Report CR-02-0333 (Role of Duty Call Supervisor)</p> <p>11. ¶₁₂ Condition Report CR-03-2568 (Response to RIS 2003-12 Regarding PARs)</p> <p>3.0 RESPONSIBILITIES</p> <p>3.1 Emergency Coordinator – Responsible for classifications, notifications and PARs.</p> <p>3.2 Recovery Manager – Responsible for notifications and PARs.</p> <p>3.3 ¶₁₁ Duty Call Supervisor – Assists the EC as a phonetalker.</p> <p>3.4 TSC EC Assistant / Logkeeper or TSC OPS Coordinator – Prepares notification forms (Attachment 1, Florida Nuclear Plant Emergency Notification Form, and if necessary, Attachment 3, NRC Reactor Plant Event Notification Worksheets) for EC approval when the TSC is operational.</p> <p>3.5 EOF RM OPS Advisor / Logkeeper – Prepares notification forms (Attachment 1 and if necessary, Attachment 3) for RM approval when the EOF is operational.</p> <p>3.6 TSC HRD Communicator – Assists the TSC EC Assistant / Logkeeper or TSC OPS Coordinator with notification form preparation and makes calls to complete notifications to the SWP.</p> <p>3.7 EOF HRD Communicator – Assists the EOF RM OPS Advisor with form preparation and makes calls to complete notifications to the SWP and the SCO following transfer of Net Control by the Division of Emergency Management (DEM).</p>		

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<p>3.8 TSC Chemistry Supervisor (in his absence, TSC Dose Assessor) – Assists the EC with radiological dose assessment data and PARS.</p> <p>3.9 EOF HP Manager (in his absence, EOF Dose Assessor) – Assists the RM with radiological dose assessment data and PARS.</p> <p>3.10 TSC Supervisor – Oversees communications performed by the TSC Communicators (HRD, ENS, Health Physics Network (HPN), Sound-Powered Phonetalker, EOF and Field Monitoring Team).</p> <p>3.11 EOF Nuclear Licensing Manager – Oversees EOF communications performed by the EOF Communicators (HRD, ENS, HPN and TSC).</p> <p>3.12 Information Services – Maintains user copies, in the Unit 1 and Unit 2 Control Rooms, of the following checklist and supporting attachments for making notifications and developing Protective Action Recommendations:</p> <ul style="list-style-type: none"> • Appendix A, Notifications from the Affected Control Room • Attachment 1 – Florida Nuclear Plant Emergency Notification Form • Attachment 1A – Directions for Completing the Florida Nuclear Plant Emergency Notification Form • Attachment 2 – Determination of Protective Action Recommendations (PARs) • Attachment 3 – NRC Reactor Plant Event Notification Worksheet • Attachment 3A – Directions for Completing the NRC Reactor Plant Event Notification Worksheet <p>3.13 Shift Communicator – Assists the Nuclear Plant Supervisor/Emergency Coordinator in making emergency off-site notifications and performing other activities, as directed.</p>		

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<p>4.0 DEFINITIONS</p> <p>4.1 Conservative – Means more extensive or comprehensive action under a given set of circumstances to provide a greater measure of safety. For example, evacuation is more conservative than sheltering.</p> <p>4.2 Emergency – Any off-normal event or condition which is classified into one of the four emergency classes (Unusual Event, Alert, Site Area Emergency, or General Emergency) by the NPS in accordance with EPIP-01, Classification of Emergencies.</p> <p>4.3 Emergency Coordinator (EC) – The title initially assumed by the NPS, until relieved by plant management through proper turnover, in the event of plant conditions that trigger implementation of the Emergency Plan. The EC is responsible for notifying off-site authorities, emergency responders both inside and outside the company and has full authority and responsibility for on-site emergency response actions. The EC is also responsible for Protective Action Recommendations during the initial stages of an emergency.</p> <p>4.4 Florida Nuclear Plant Emergency Notification Form – A predetermined format used by nuclear power plants throughout the State for notification and local authorities.</p> <p>4.5 Operational (status for an emergency facility) – The mandatory minimum staff is present and the facility has taken responsibility for its procedurally assigned functions.</p> <p>4.6 Protective Action Recommendations (PARs) – Recommendations, for action instructions to protect the public, made by the Emergency Coordinator or Recovery Manager to State and County officials. FPL may recommend No Action, Sheltering or Evacuation.</p> <p>4.7 Recovery Manager (RM) – A designated company officer or senior manager, who will have responsibility for the direction and control of the EOF. He / she has the authority to establish policy and to expend funds necessary to cope with emergency situations that trigger the implementation of the Emergency Plan.</p> <p>4.8 Release (during any declared emergency)</p> <p>1. Any effluent monitor increase of (approximately) 10 times or one decade above pre-transient values.</p> <p style="text-align: center;">OR</p> <p>2. Health Physics detecting airborne radioactivity levels in excess of 25% derived air concentration (DAC) outside of plant buildings due to failure of equipment associated with the declared emergency.</p>		

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- 4.9 Shift Communicator** – A specific shiftly designated individual trained and qualified to assist the Nuclear Plant Supervisor/Emergency Coordinator in the control room in making emergency off-site notifications, and performing other activities as directed.
- 4.10 State Notification Form (SNF)** – Less formal, more concise expression used in lieu of Florida Nuclear plant Emergency Notification Form.

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5.0 INSTRUCTIONS

5.1 State and County Notification

1. Time Limits

A. Notification shall be initiated within 15 minutes of any of the following:

- 1. Recognition of entry into the Emergency Plan.**
- 2. Escalation in Emergency Class.**
- 3. De-escalation of the Emergency Class.**
- 4. Protective Action Recommendation.**
- 5. Change in Protective Action Recommendation.**

B. Notification shall be initiated within 60 minutes of any of the following:

- 1. At an Alert or higher Emergency Class, the time of the last update (unless a different frequency has been agreed to by the off-site agencies as during a hurricane).**
- 2. A radiological release has been initiated.**
- 3. A radiological release has been terminated.**
- 4. A significant change in plant conditions has occurred (e.g., loss or restoration of off-site power or major plant equipment).**
- 5. Termination of the emergency.**

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5.1 State and County Notification (continued)

2. Forms Required for Notifications

CAUTION

Notifications require the use of a form similar to Attachment 1, Florida Nuclear Plant Emergency Notification Form.

- A. Notifications with 15 minute time limits shall be made using a form similar to Attachment 1, Florida Nuclear Plant Emergency Notification Form.
- B. Notifications with 60 minute time limits shall be made using a form similar to Attachment 1, Florida Nuclear Plant Emergency Notification Form.

3. Special instructions due to extraordinary circumstances.

- A. If Emergency Class escalation is necessary due to rapidly degrading conditions, Then provide the State and County authorities with the initial notification information by transmitting lines 1-6, at a minimum, of the SNF and terminate the phone call by stating that a new notification form will be provided within 15 minutes.

CAUTION

There can not be two concurrent declared emergency classes under the St. Lucie Plant Radiological Emergency Plan.

- B. If one Unit is in a classified event and the same or the other Unit enters into an event where the same or lesser Emergency Class would apply, Then a new classification should NOT be declared. The event should be documented on a SNF as "Additional Information or Update" and issued as soon as practicable.
- C. If one Unit is in a classified event and the other Unit enters into a more severe event in which a higher Emergency Class would apply, Then the new classification shall be declared and promptly, within the regulatory time limits, issued to the State, Counties and the NRC.

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5.1 State and County Notification (continued)

4. ¶4 Transfer of NET Control

A. The State Coordinating Officer (SCO) can transfer the control of Hot Ring Down (HRD) NET from the State Warning Point (SWP) to the EOF. When this occurs;

- 1.** The RM shall do face to face communication to satisfy off-site notification requirements for the State and Counties. Calls to the SWP are no longer necessary.
- 2.** The Florida Nuclear Plant Emergency Notification Form (Attachment 1) shall continue to be filled out.
- 3.** Completed notification forms are to be provided to the SCO or his / her designee in the EOF.

END OF SECTION 5.1

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5.2 Nuclear Regulatory Commission (NRC) Notification

1. Time Limits

NOTE

Notification of the NRC is expected immediately after notification of State and local agencies. The one-hour time limit in 10 CFR 50.72 (a)(3) is to ensure timely NRC notification in cases where notification of State and local agencies is delayed or prolonged.

- A.** The licensee shall notify the NRC immediately after notification of the appropriate State or local agencies and not later than one hour after the time the licensee declares one of the Emergency Classes (10 CFR 50.72 (a)(3)).

2. Special Instructions

- A.** Initial notification to the NRC using the Emergency Notification System (ENS) (usually done from the Control Room) should use Attachment 3, NRC Reactor Plant Event Notification Worksheet.
- B.** At an Alert or higher emergency class, the NRC will want to establish an open line of communication with the Control Room, utilizing an ENS conference bridge tying in the licensee with NRC Headquarters and region personnel. Once the Technical Support Center (TSC) is operational, the Control Room should transfer responsibility for NRC communications to the TSC.
- C.** The Emergency Operations Facility (EOF) should join the TSC on the ENS conference bridge and take the lead for NRC communications.
- D.** The TSC and EOF should also utilize the Health Physics Network (HPN) line in a manner similar to the ENS (i.e., establish a conference bridge with the NRC).
- E.** Both the ENS and HPN Communicators in both facilities should keep logs of information transmitted and received from the NRC in accordance with procedures.

END OF SECTION 5.2

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5.3 ¶1 Erroneous Information

- 1.** If erroneous information is transmitted to off-site agencies and the error is discovered prior to event termination, a correction should be provided in an update. The need for and urgency of providing the update is dependent upon the importance of the error.
- 2.** If erroneous information is transmitted to off-site agencies and the error is discovered after event termination, the Licensing Department should be consulted to determine the need and method for contacting the off-site agencies with corrected information.

END OF SECTION 5.3

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NOTIFICATIONS FROM THE AFFECTED CONTROL ROOM
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INITIAL

CAUTION

- §1 Notification of State and local agencies shall be made as soon as practicable within 15 minutes of declaration of an Emergency Class.
- ¶3 A new Florida Nuclear Plant Emergency Notification Form shall be completed for all updates.

NOTE

- ¶9 1. Completion of this checklist requires the following Attachments (all from EPIP-08):
- Attachment 1 – Florida Nuclear Plant Emergency Notification Form
- Attachment 1A – Directions for Completing the Florida Nuclear Plant Emergency Notification Form
- Attachment 2 – Determination of Protective Action Recommendations (PARs)
- Attachment 3 – NRC Reactor Plant Event Notification Worksheet
- Attachment 3A – Directions for Completing the NRC Reactor Plant Event Notification Worksheet
2. Checklist Part 1 is for State Warning Point notification.
3. Checklist Part 2 is for NRC notification.

1. State Warning Point Notification

- A.** Prepare the Florida Nuclear Plant Emergency Notification Form (form similar to Attachment 1) in accordance with Attachment 1A, Directions for Completing the Florida Nuclear Plant Emergency Notification Form. _____
- B.** Emergency Coordinator (EC) approval. _____

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1. (continued)

INITIAL

NOTE

1. Primary notification method to the State Warning Point (SWP) is to use the Hot Ring Down (HRD) phone.
2. If the HRD is out-of-service, alternate notification methods are provided in Section E, below.

C. Using the State HOT RING DOWN (HRD) Phone, dial 100. _____

D. Hold down the button on the handset while talking. This must be done each time you talk. Release the button in order to listen. When the State Duty Officer answers, announce "This is St. Lucie Nuclear Plant [as applicable (Unit 1, 2)] with an emergency message. I am standing by to transmit the Florida Nuclear Plant Emergency Notification Form when you are ready to copy." Allow the Duty Officer to contact St. Lucie County, Martin County and the Bureau of Radiation Control prior to transmitting the information from the notification form. When the parties are on line, provide the information slowly (e.g., in three word intervals) and deliberately, providing time for the information to be written down. _____

E. Alternate Notification Methods (in order of priority)

NOTE

Use of the commercial telephone as an alternate notification method requires callback verification from the State Warning Point. Use of ESATCOM as an alternate notification method should include a callback verification number if available (e.g., cellular phone).

1. Alternate 1 – Commercial Phone

- a. Call the State Warning Point using the phone number in the St. Lucie Plant Emergency Response Directory (ERD). Announce "This is St. Lucie Nuclear Plant [as applicable (Unit 1 / 2)] with an emergency declaration. My callback number is _____."

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- | | | | | |
|----|----|----|--|----------------|
| 1. | E. | 1. | (continued) | <u>INITIAL</u> |
| | | b. | Hang up the phone and standby for the callback. When the State Warning Point gives the go-ahead, provide the information from the Florida Nuclear Plant Emergency Notification Form. | _____ |
| | | c. | ¶ ₂ Request callback from the State Warning Point to verify that they notified St. Lucie County, Martin County and the Bureau of Radiation Control. | _____ |
| | | 2. | Alternate 2 - ESATCOM | |

NOTE
Use ESATCOM only if Alternate 1 – commercial phone is not available.

- | | | |
|----|--|-------|
| a. | Hold down the "push-to-talk" button on the handset and wait 3-5 seconds to hear a beep before you start talking. This must be done each time you talk. | _____ |
| b. | Announce "State Warning Point, this is St. Lucie Nuclear Plant [as applicable (Unit 1 / 2)] with an emergency declaration." Then release the "push-to-talk" button in order to listen. | _____ |
| c. | When the State Warning Point acknowledges, announce "State Warning Point, this is St. Lucie Nuclear Plant [as applicable (Unit 1 / 2)] declaring a / an (classification), repeat (classification). I am standing by to transmit Florida Nuclear Plant Emergency Notification Form information when you are ready to copy. When the State Warning Point gives the go-ahead, provide the information from the Florida Nuclear Plant Emergency Notification Form. | _____ |
| d. | Announce "St. Lucie clear" at the end of the conversation. | _____ |

REVISION NO.: 6	PROCEDURE TITLE: OFF-SITE NOTIFICATIONS AND PROTECTIVE ACTION RECOMMENDATIONS ST. LUCIE PLANT	PAGE: 21 of 49
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APPENDIX A
NOTIFICATIONS FROM THE AFFECTED CONTROL ROOM
(Page 4 of 4)

INITIAL

CAUTION

Notification of the NRC is expected immediately after notification of State and local agencies. The one hour time limit in 10 CFR 50.72 (a)(3) is to ensure timely NRC notification in cases where notification of State and local agencies is delayed or prolonged.

2. §1 NRC Notification

A. Prepare the NRC Reactor Plant Event Notification Worksheet (form similar to Attachment 3) in accordance with Attachment 3A, Directions for Completing the NRC Reactor Plant Event Notification Worksheet.

B. EC approval.

NOTE

- 1. Primary notification method to the NRC is to use the Emergency Notification System (ENS) phone.**
- 2. If the ENS is out-of-service an alternate notification method is provided in Section D, below.**

C. Transmit the form by dialing one of the numbers shown on the phone or in the Emergency Response Directory (ERD).

D. Alternate Notification Method

- 1. If the ENS is out-of-service, Then use a commercial phone to accomplish the above.**

END OF APPENDIX A

/R6

REVISION NO.: 6	PROCEDURE TITLE: OFF-SITE NOTIFICATIONS AND PROTECTIVE ACTION RECOMMENDATIONS ST. LUCIE PLANT	PAGE: 22 of 49
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APPENDIX B
NOTIFICATIONS FROM THE TECHNICAL SUPPORT CENTER (TSC)
(Page 1 of 5)

INITIAL

CAUTION

- §₁ Notification of State and local agencies shall be made as soon as practicable within 15 minutes of declaration of an Emergency Class.
- ¶₃ A new Florida Nuclear Plant Emergency Notification Form shall be completed for all updates.

NOTE

- Checklist Part 1 is for HRD Communications.
- Checklist Part 2 is for ENS Communications.

1. State Warning Point Notification

- A.** Prepare the Florida Nuclear Plant Emergency Notification Form (form similar to Attachment 1) in accordance with Attachment 1A, Directions for Completing the Florida Nuclear Plant Emergency Notification Form.
- B.** Verify the Emergency Coordinator (EC) approval. _____

NOTE

- 1.** Primary notification method to the State Warning Point (SWP) is to use the Hot Ring Down (HRD) phone.
- 2.** If the HRD is out-of-service, alternate notification methods are provided in Section E, below.

- C.** Using the State HOT RING DOWN (HRD) Phone, dial 100. _____

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APPENDIX B
NOTIFICATIONS FROM THE TECHNICAL SUPPORT CENTER (TSC)
 (Page 2 of 5)

1. (continued) INITIAL

- D. Hold down the button on the handset while talking. This must be done each time you talk. Release the button in order to listen. When the State Duty Officer answers, announce "This is St. Lucie Nuclear Plant Technical Support Center with an emergency message. I am standing by to transmit the Florida Nuclear Plant Emergency Notification Form when you are ready to copy." Allow the Duty Officer to contact St. Lucie County, Martin County and the Bureau of Radiation Control prior to transmitting the information from the notification forms. When the parties are on line, provide the information slowly (e.g., in three word intervals) and deliberately, providing time for the information to be written down.

E. Alternate Notification Methods (in order of priority)

NOTE
 Use of the commercial telephone as an alternate notification method requires callback verification from the State Warning Point. Use of ESATCOM as an alternate notification method should include a callback verification number if available (e.g., cellular phone).

1. Alternate 1 – Commercial Phone

- a. Call the State Warning Point using the phone number in the St. Lucie Plant Emergency Response Directory (ERD). Announce "This is St. Lucie Nuclear Plant Technical Support Center with an emergency declaration. My callback number is _____."
- b. Hang up the phone and standby for the callback. When the State Warning Point gives the go-ahead, provide the information from the Florida Nuclear Plant Emergency Notification Form.
- c. ¶₂ Request callback from the State Warning Point to verify that they notified St. Lucie County, Martin County and the Bureau of Radiation Control.

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APPENDIX B
NOTIFICATIONS FROM THE TECHNICAL SUPPORT CENTER (TSC)
(Page 3 of 5)

1. E. (continued) INITIAL
2. Alternate 2 - ESATCOM

NOTE
Use ESATCOM only if Alternate 1 – commercial phone is not available.

- a. Hold down the "push-to-talk" button on the handset and wait 3-5 seconds to hear a beep before you start talking. This must be done each time you talk. _____
- b. Announce "State Warning Point, this is St. Lucie Nuclear Plant Technical Support Center with an emergency declaration." Then release the "push-to-talk" button in order to listen. _____
- c. When the State Warning Point acknowledges, announce "State Warning Point, this is St. Lucie Nuclear Plant Technical Support Center declaring a / an (classification), repeat (classification). I am standing by to transmit the Florida Nuclear Plant Emergency Notification Form when you are ready to copy. When the State Warning Point gives the go-ahead, provide the information from the Florida Nuclear Plant Emergency Notification Form. _____
- d. Announce "St. Lucie clear" at the end of the conversation. _____

REVISION NO.: 6	PROCEDURE TITLE: OFF-SITE NOTIFICATIONS AND PROTECTIVE ACTION RECOMMENDATIONS ST. LUCIE PLANT	PAGE: 25 of 49
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APPENDIX B
NOTIFICATIONS FROM THE TECHNICAL SUPPORT CENTER (TSC)
(Page 4 of 5)

INITIAL

CAUTION

Notification of the NRC is expected immediately after notification of State and local agencies. The one-hour time limit in 10 CFR 50.72 (a)(3) is to ensure timely NRC notification in cases where notification of State and local agencies is delayed or prolonged.

NOTE

1. Primary notification method to the NRC is to use the Emergency Notification System (ENS) phone.
2. If the ENS is out-of-service, an alternate notification method is provided in Section B, below.

2. §1 NRC Notification

A. Choose and complete the appropriate steps, below:

1. If the NRC Reactor Plant Event Notification Worksheet has NOT previously been transmitted from the Control Room, Then request that the EC Assistant / Logkeeper prepare the form. _____
2. Verify EC approval. _____
3. Transmit the form by dialing one of the numbers shown on the phone or in the Emergency Response Directory (ERD), then GO TO the next step to establish an open line of communication with the NRC. _____

OR

4. If the NRC Reactor Plant Event Notification Worksheet has previously been transmitted by the Control Room, Then initiate an open line of communication with the NRC by dialing one of the numbers shown on the phone or in the ERD and request to be placed on the Conference Bridge with the NRC. _____
5. As requested, provide information to the NRC. _____

REVISION NO.: 6	PROCEDURE TITLE: OFF-SITE NOTIFICATIONS AND PROTECTIVE ACTION RECOMMENDATIONS ST. LUCIE PLANT	PAGE: 26 of 49
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APPENDIX B
NOTIFICATIONS FROM THE TECHNICAL SUPPORT CENTER (TSC)
(Page 5 of 5)

2. (continued) INITIAL
- B. Alternate Notification Method
1. If the ENS is out-of-service, Then use a commercial phone to accomplish the above. _____

END OF APPENDIX B

REVISION NO.: 6	PROCEDURE TITLE: OFF-SITE NOTIFICATIONS AND PROTECTIVE ACTION RECOMMENDATIONS ST. LUCIE PLANT	PAGE: 27 of 49
PROCEDURE NO.: EPIP-08		

APPENDIX C
NOTIFICATIONS FROM THE EMERGENCY OPERATIONS FACILITY (EOF)
 (Page 1 of 6)

INITIAL

CAUTION

- §₁ Notification of State and local agencies shall be made as soon as practicable within 15 minutes of declaration of Emergency Class or change in Protective Action Recommendation (PAR).
- ¶₃ A new Florida Nuclear Plant Emergency Notification Form shall be completed for all updates.

NOTE

- Checklist Part 1 is for HRD Communications.
- Checklist Part 2 is for ENS Communications.

1. State Warning Point Notification

- A. Prepare the Florida Nuclear Plant Emergency Notification Form (form similar to Attachment 1) in accordance with Attachment 1A, Directions for Completing the Florida Nuclear Plant Emergency Notification Form.
- B. Verify the Recovery Manager (RM) approval. _____

REVISION NO.: 6	PROCEDURE TITLE: OFF-SITE NOTIFICATIONS AND PROTECTIVE ACTION RECOMMENDATIONS ST. LUCIE PLANT	PAGE: 28 of 49
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APPENDIX C
NOTIFICATIONS FROM THE EMERGENCY OPERATIONS FACILITY (EOF)
 (Page 2 of 6)

1. (continued)

INITIAL

NOTE

1. Primary notification method to the State Warning Point (SWP) is to use the Hot Ring Down (HRD) phone.
2. If the HRD is out-of-service, alternate notification methods are provided in Section D, below.
3. State and County representatives means Florida Division of Emergency Management (DEM), Florida Department of Health (DOH), St. Lucie County Department of Public Safety (DPS) and Martin County Department of Emergency Services (DES).
4. Notification forms means the Florida Nuclear Plant Emergency Notification Form.

C. Choose and complete the appropriate step below:

1. If State and County representatives are NOT co-located with the FPL Emergency Response Organization (ERO) in the EOF, Then call the SWP and transmit the notification forms. To contact the SWP, dial 100. Hold down the button on the handset while talking. This must be done each time you talk. Release the button in order to listen. When the State Duty Officer answers, announce "this is St. Lucie Nuclear Plant Emergency Operations Facility with an emergency message. I am standing by to transmit the Florida Nuclear Plant Emergency Notification Form when you are ready to copy." Allow the Duty Officer to contact the Bureau of Radiation Control, St. Lucie County DPS and Martin County DES prior to transmitting the information from the notification forms. When the parties are on line, transmit the information slowly, (e.g., in three word intervals) and deliberately, providing time for the information to be written down.

OR

/R6

/R6

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APPENDIX C
NOTIFICATIONS FROM THE EMERGENCY OPERATIONS FACILITY (EOF)
(Page 3 of 6)

1. C. (continued) INITIAL

2. If State and County representatives are co-located with the FPL ERO in the EOF and the State Coordinating Officer (SCO) has NOT assumed Net Control, Then call the SWP and transmit the notification forms – "Time of Contact" corresponds to the start time of the Recovery Manager's Protective Action Recommendation (PAR) Briefing. To contact the SWP, dial 100. Hold down the button on the handset while talking. This must be done each time you talk. Release the button in order to listen. When the State Duty Officer answers, announce "this is St. Lucie Nuclear Plant Emergency Operations Facility with an emergency message. I am standing by to transmit the Florida Nuclear Plant Emergency Notification Form when you are ready to copy." Allow the Duty Officer to contact the Bureau of Radiation Control, St. Lucie County DPS and Martin County DES prior to transmitting the information from the notification forms. When the parties are on line, transmit the information slowly, (e.g., in three word intervals) and deliberately, providing time for the information to be written down.

OR

3. If State and County representatives are co-located with the FPL ERO in the EOF and the SCO has transferred Net Control to the EOF, Then the SWP is not called (completed notification forms are given to the SCO – may be accomplished by the RM or RM OPS Advisor / Logkeeper).

D. Alternate Notification Methods (in order of priority)

NOTE

Use of the commercial telephone as an alternate notification method requires callback verification from the State Warning Point. Use of ESATCOM as an alternate notification method should include a callback verification number if available (e.g., cellular phone).

1. Alternate 1 – Commercial Phone

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APPENDIX C
NOTIFICATIONS FROM THE EMERGENCY OPERATIONS FACILITY (EOF)
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1. D. 1. (continued) INITIAL
- a. Call the State Warning Point using the phone number in the St. Lucie Plant Emergency Response Directory (ERD). Announce "This is St. Lucie Nuclear Plant Emergency Operations Facility with an emergency declaration. My callback number is _____."
- b. Hang up the phone and standby for the callback. When the State Warning Point gives the go-ahead, provide the information from the Florida Nuclear Plant Emergency Notification Form. _____
- c. ¶₂ Request callback from the State Warning Point to verify that they notified St. Lucie County, Martin County and the Bureau of Radiation Control. _____
2. Alternate 2 - ESATCOM

NOTE
Use ESATCOM only if Alternate 1 – commercial phone is not available.

- a. Hold down the "push-to-talk" button on the handset and wait 3-5 seconds to hear a beep before you start talking. This must be done each time you talk. _____
- b. Announce "State Warning Point, this is St. Lucie Nuclear Plant Emergency Operations Facility with an emergency declaration." Then release the "push-to-talk" button in order to listen. _____
- c. When the State Warning Point acknowledges, announce "State Warning Point, this is St. Lucie Nuclear Plant Emergency Operations Facility declaring a / an (classification), repeat (classification). I am standing by to transmit the Florida Nuclear Plant Emergency Notification Form when you are ready to copy." When the State Warning Point gives the go-ahead, provide the information from the Florida Nuclear Plant Emergency Notification Form. _____

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APPENDIX C
NOTIFICATIONS FROM THE EMERGENCY OPERATIONS FACILITY (EOF)
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1. D. 2. (continued) INITIAL
- d. Announce "St. Lucie clear" at the end of the conversation. _____

CAUTION

Notification of the NRC is expected immediately after notification of State and local agencies. The one-hour time limit in 10 CFR 50.72 (a)(3) is to ensure timely NRC notification in cases where notification of State and local agencies is delayed or prolonged.

2. §1 NRC Notification

NOTE

1. Primary notification method to the NRC is to use the Emergency Notification System (ENS) phone.

2. If the ENS is out-of-service, an alternate notification method is provided in Section B, below.

- A. Choose and complete the appropriate steps, below:

1. If the NRC Reactor Plant Event Notification Worksheet has NOT previously been transmitted from either the Control Room or Technical Support Center (TSC), Then request that the RM OPS Advisor prepare the form. _____
2. Verify RM approval. _____
3. Transmit the form by dialing one of the numbers shown on the phone or in the Emergency Response Directory (ERD), then GO TO the next step to establish an open line of communication with the NRC. _____

OR

4. If the NRC Reactor Plant Event Notification Worksheet has previously been transmitted by either the Control Room or the TSC, Then initiate an open line of communication with the NRC by dialing one of the numbers shown on the phone or in the ERD and request to be placed on the Conference Bridge with the NRC and the St. Lucie TSC. _____

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APPENDIX C
NOTIFICATIONS FROM THE EMERGENCY OPERATIONS FACILITY (EOF)
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- | | | | |
|----|----|--|----------------|
| 2. | A. | (continued) | <u>INITIAL</u> |
| | 5. | Take the lead in providing information to the NRC. | _____ |
| | B. | Alternate Notification Method | |
| | 1. | <u>If</u> the ENS is out-of-service, <u>Then</u> use a commercial phone to accomplish the above. | _____ |

END OF APPENDIX C

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¶₆ ATTACHMENT 1A
DIRECTIONS FOR COMPLETING THE FLORIDA NUCLEAR PLANT EMERGENCY
NOTIFICATION FORM
 (Page 1 of 7)

ITEM ENTRY

On-line Verification - Check the appropriate boxes as the State Warning Point (Florida Division of Emergency Management) requests that St. Lucie County Department of Public Safety and the Martin County Division of Emergency Management get on the line, prior to initiating the notification. All three agencies must be notified through the SWP or alternate means.

1. Check appropriate box for drill or actual emergency as the case may be. During exercises, drills, or tests, each message shall be checked **THIS IS A DRILL**.
- 2A. Enter today's date.
- 2B. Enter the time (using the official time, normally synchronized with ERDADS) when contact is made with the State Warning Point or the start time of the RM PAR Briefing. For initial notification of classification, this shall be within 15 minutes of the "Emergency Declaration" time in item 5.
- 2C. Enter the name of the person making the notification call.
- 2D. Enter the message number beginning with #1 and following sequentially in all facilities (e.g., if the Control Room transmitted two messages the TSC would start with #3).
- 2E. Check the box for the facility from which the notification is being made.
3. Site
Check the box for the appropriate plant site for the emergency declaration (both St Lucie boxes might need to be checked for dual unit events such as approach of a hurricane).
4. Emergency Classification
Check the box corresponding to current accident classification declared.
5. Emergency Declaration or Emergency Termination
Enter the date and time when the current emergency classification was declared (A) or (B) when the emergency was terminated.

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ATTACHMENT 1A
DIRECTIONS FOR COMPLETING THE FLORIDA NUCLEAR PLANT EMERGENCY
NOTIFICATION FORM

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6. Reason for Emergency Declaration

Enter the Emergency Action Level (EAL) number (A) (This option is currently not being used at Plant St. Lucie) or (B) enter wording like that found in the EAL information in EPIP-01, Classification Of Emergencies. Wording should be brief yet descriptive enough for the off-site agencies to gain an understanding of the event. It should be clear from the incident description which EAL has necessitated the emergency declaration. Wording should be as non-technical as possible with no acronyms or abbreviations. This information should remain the same throughout update messages, unless there is a classification change.

*** asterisk and instruction provided at the bottom of form - If Emergency Class escalation is necessary due to rapidly degrading conditions, Then provide the State and County authorities with the initial notification information by transmitting lines 1-6, at a minimum, on the State Notification Form (SNF) and terminate the call by stating that a new notification form will be provided within 15 minutes.

7. Additional Information or Update

Check "None" (A) or (B) Description and enter additional information, if necessary, or reason for update here. For example:

- Protective Action Recommendations (PARs) change
- An occurrence that would otherwise result in a lower emergency classification, on other unit
- Weather changes affecting public safety
- Radiation level changes
- Loss of off-site power, etc.

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ATTACHMENT 1A
DIRECTIONS FOR COMPLETING THE FLORIDA NUCLEAR PLANT EMERGENCY
NOTIFICATION FORM
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NOTE

If the Class A Model (dose projection model) is being used, a 'State Notification Form Summary Sheet' is available which provides information for items 8-11, 13 and 14. The information is in a format similar to that found on the Florida Nuclear Plant Emergency Notification Form.

8. Weather Data

NOTE

10 meter data should be used.

- A. ¶₁₀ Wind direction can be obtained from ERDADS by depressing the "EPIP" key, on the top row of the keyboard. The Met Tower Indicator Panel in the Unit 1 Control Room is an alternate source. If these two sources are not available, refer to Attachment 1, Meteorological Data, in EPIP-09, Off-Site Dose Calculations.
- B. If the wind direction is greater than 360° the wind direction is determined by subtracting 360° from the indicated number. Wind direction should be rounded to the nearest whole number.
- C. Wind direction is always given as "wind from" (an easterly wind, or wind direction 90°, means that the wind is blowing from east to west).
- D. When determining the sectors affected, the adjacent sectors on both sides of the actual downwind sector are included. Three sectors will typically be listed.
- E. If the wind is located on the edge of a sector (i.e., 11°, 33°, etc.) an additional (fourth) sector should be added.
- F. Enter the wind direction (wind from) in degrees in item "A."

/R6

/R6

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ATTACHMENT 1A
DIRECTIONS FOR COMPLETING THE FLORIDA NUCLEAR PLANT EMERGENCY
NOTIFICATION FORM
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8. (continued)

G. Enter the downwind sectors in item "B."

Wind From	Sectors Affected	Wind From	Sectors Affected	Wind From	Sectors Affected
348-11	HJK	123-146	PQR	236-258	CDE
11-33	JKL	146-168	QRA	258-281	DEF
33-56	KLM	168-191	RAB	281-303	EFG
56-78	LMN	191-213	ABC	303-326	FGH
78-101	MNP	213-236	BCD	326-348	GHJ
101-123	NPQ	There is <u>no</u> "O" sector		There is <u>no</u> "I" sector	

9. Release Status

A. If there are no indications of a release of radioactive material, check box "A" and go to item 11.

A release of radioactive material (during any declared emergency) is defined as:

- Any effluent monitor increase of (approximately) 10 times or one decade above pre-transient values

OR

- Health Physics detecting airborne radioactivity levels in excess of 25% derived air concentration (DAC) outside of plant buildings due to failure of equipment associated with the declared emergency.

B. If a release of radioactive material is occurring, even though it may be less than normal operating limits, check box "B."

C. If a release has occurred but stopped, check box "C."

Dose Assessment personnel in the TSC or EOF will have this information. The TSC Chemistry Supervisor, TSC HP Supervisor or EOF HP Manager should be contacted for the data.

/R6

/R6

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ATTACHMENT 1A
DIRECTIONS FOR COMPLETING THE FLORIDA NUCLEAR PLANT EMERGENCY
NOTIFICATION FORM
(Page 5 of 7)

10. Release Significance Category

Do Not Check Any Box in Item 10 if you Checked Box 9 "A" No Release

- A. If a release is occurring or has occurred and dose information is not available at the time of notification, check box "A" and follow up as soon as information becomes available.
- B. Check box "B" if both noble gas and iodine release rates are less than or equal to the following:

Noble Gas release $\leq 3.5 \text{ E}+5 \text{ } \mu\text{Ci/sec}$ (3.5 E-1 Ci/sec)
Iodine release $\leq 4.6 \text{ E}+1 \text{ } \mu\text{Ci/sec}$ (4.6 E-5 Ci/sec)

- C. Check box "C" if either noble gas or iodine release rates exceed the values in "B" (above) but forecasted 1 mile doses are less than either 500 mrem TEDE or 1000 mrem Thyroid CDE. These doses are less than the state's Protective Action Guide (PAG) levels.
- D. Check box "D" if forecasted 1 mile doses are greater than or equal to either 500 mrem TEDE or 1000 mrem Thyroid CDE. These PAG levels require state and county action.

11. Utility Recommended Protective Actions

- A. If there are no Protective Action Recommendations (PARs), check Box "A."
- B. If PARs are necessary, check Box "B". Two formats are provided to record PARs. Use the "sector" format and determine appropriate PARs using the guidance in Attachment 2 to this procedure. Copy the PARs into item 11 "C." Indicate PARs using only the words NONE, ALL, ALL REMAINING or by listing the letters of the sectors affected. Protective Action Recommendations shall be approved by the Emergency Coordinator (EC) or the Recovery Manager (RM). The "zone" format is for Crystal River Unit 3 use only.
- C. Check the "Yes" box (to consider issuance of potassium iodide (KI) only if:
 - (1) A General Emergency has been declared
 - AND
 - (2) A release of radioactive material is occurring.

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ATTACHMENT 1A
DIRECTIONS FOR COMPLETING THE FLORIDA NUCLEAR PLANT EMERGENCY
NOTIFICATION FORM
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12. Plant Conditions

Answer the three questions "Yes" or "No" by checking the appropriate box.

- A. Is the reactor shut down?
- B. Is the core adequately cooled?
- C. Is the containment intact?

Answer the question regarding the condition of the core as either stable or degrading.

13. Weather Data

NOTE
10 meter data should be used.

- A. ¶₁₀ Temperature, wind speed and wind direction can be obtained from ERDADS by depressing the "EPIP" key, on the top row of the keyboard. The Met Tower Indicator Panel in the Unit 1 Control Room is an alternate source. If these two sources are not available, refer to Attachment 7, Meteorological Data, in EPIP-09, Off-site Dose Calculations.
- B. Enter wind speed in Miles Per Hour (MPH) in item "A".
- C. Stability Class - Enter the stability class as determined by using the figure below. The figure shows the relationship between the Delta T displayed by ERDADS and the stability class.

If Delta-T is	Then Stability Class is
Less than or equal to -1.7	A
-1.6 to -1.5	B
-1.4	C
-1.3 to -0.5	D
-0.4 to +1.4	E
+1.5 to +3.6	F
Greater than +3.6	G

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ATTACHMENT 1A
DIRECTIONS FOR COMPLETING THE FLORIDA NUCLEAR PLANT EMERGENCY
NOTIFICATION FORM
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14. Additional Release Information

This section requires that a release be in progress and completed results of dose assessment be available. Check the "N/A" box if no release is occurring and/or if dose information is not available. Otherwise, provide all information that applies.

- A. Enter the noble gas release rate in curies per second.
- B. Enter the iodine release rate in curies per second.
- C. For an airborne release, enter the date and time started and when terminated, the date and stopped.
- D. For a liquid release, enter the date and time started and when terminated, the date and time stopped.

Projected Dose Information - Enter the projected Thyroid Dose (CDE) in mrem for 1 hour (EPIP-09, Manual Dose Calculation Worksheet, Line 5) and the projected Total Dose (TEDE) in mrem for 1 hour (EPIP-09, Manual Dose Calculation Worksheet, Line 16) for the site boundary 2, 5 and 10 miles.

15. Message Received By

Enter the name of the State Warning Point Duty Officer or the individual that receives the notification. Enter the time at the State Warning Point (request it from the Duty Officer) and indicate the date the call is completed.

END OF ATTACHMENT 1A

REVISION NO.: 6	PROCEDURE TITLE: OFF-SITE NOTIFICATIONS AND PROTECTIVE ACTION RECOMMENDATIONS ST. LUCIE PLANT	PAGE: 41 of 49
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ATTACHMENT 2
DETERMINATION OF PROTECTIVE ACTION RECOMMENDATIONS (PARs)
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NOTE

- Initial notification from the Control Room may utilize PARs based on plant conditions.
- Once dose assessment begins, PARs should be made utilizing all available data including off-site dose projections, plant conditions and field monitoring data.
- **Both plant conditions and off-site doses shall be considered for PARs.**
- The most conservative recommendations should be made.
- If it is anticipated that a threshold for a PAR will be exceeded, it is neither necessary nor desirable to wait until the threshold is exceeded to make that PAR.
- ¶₁₂ Conditions (plant information, dose projections and field monitoring results) are to be continually assessed and PARs expanded, as necessary, to ensure that adequate (most conservative) PARs are issued.
- ¶₁₂ Previously issued PARs, unless found to be less conservative, are to remain in effect until the threat is fully under control and the event is being de-escalated.
- ¶₁₂ Only State and County officials can implement, change and/or terminate protective actions.

1. PAR Flowchart

A. PARs Based on Plant Conditions

- 1. Begin in the upper left hand corner of the chart by answering the General Emergency (GE) question.**
- 2. Correctly answer the questions until you reach one of the boxes that provides PAR information based on plant conditions.**
- 3. If there is no release, Then go to the PAR Worksheet and fill-in the PARs based on plant conditions. The sectors affected can be determined by referring to number 8, Weather Data, in Attachment 1A, Directions for Completing the Florida Nuclear Plant Emergency Notification Form.**

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ATTACHMENT 2
DETERMINATION OF PROTECTIVE ACTION RECOMMENDATIONS (PARs)
(Page 2 of 5)

1. A. (continued)

4. If a release is involved, Then go to Section B, PARs Based on Off-site Dose, below.

NOTE

- If the Class A Model printout, State Notification Form Summary Sheet is available, it should be used to compare dose-based PARs against PARs based on plant conditions.
- Calculated off-site doses should be compared to field monitoring data when determining PARs.

B. PARs Based on Off-site Dose

1. PARs are based on the Total Effective Dose Equivalent (TEDE or total dose) and / or the Committed Dose Equivalent (CDE, thyroid dose). Do NOT use dose rate values.
2. If using the Class A Model, Then in Forecast Mode, print the State Notification Form Summary for computer generated PARs.
 - a. Go to Section C, PAR Worksheet
3. If using EPIP-09, Off-site Dose Calculations, Then calculate TEDE and CDE in accordance with the procedure.
 - a. Compare the TEDE dose at 1 mile with the values on the Flowchart. Enter the chart at the appropriate dose level by determining if the dose is between 500 and 999 mrem or between 1000 and 4999 mrem or 5000 mrem or greater.
 - b. From the selected dose level, move to the right on the chart to the first column, 0-2 miles. The PAR provided corresponds to the calculated TEDE at 1 mile.
 - c. Enter the PAR in the 0-2 miles block on the TEDE DOSE table below the PAR Flowchart. The sectors affected can be determined by referring to number 8, Weather Data, in Attachment 1A, Directions for Completing the Florida Nuclear Plant Emergency Notification Form.

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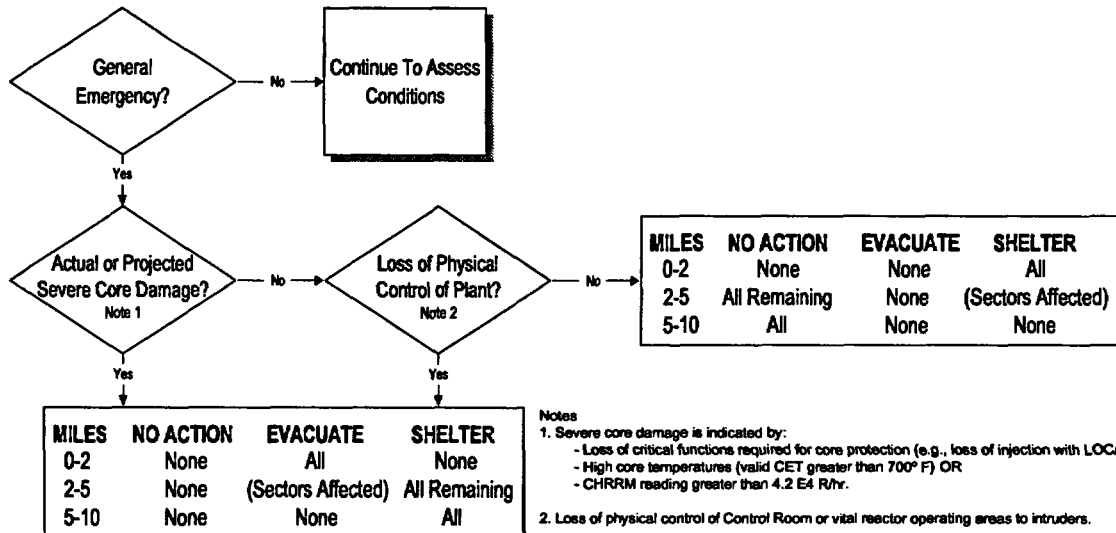
1. B. 3. (continued)

- d. Continue to determine the corresponding PAR at 2-5 miles using the calculated 2 mile TEDE, at 5-10 miles using the calculated 5 mile TEDE and the 10 miles plus (To Be Determined (TBD) distance) using the calculated 10 mile TEDE, as necessary.
- e. Enter the PAR information in the appropriate blocks of the TEDE DOSE table.
- f. Follow the same methodology for determining the PARs corresponding to the calculated CDE values beginning with the calculated value at 1 mile.
- g. Enter each of the determined PARs in the CDE (Thyroid) DOSE table below the PAR Flowchart.
- h. Go to Section C, PAR Worksheet.

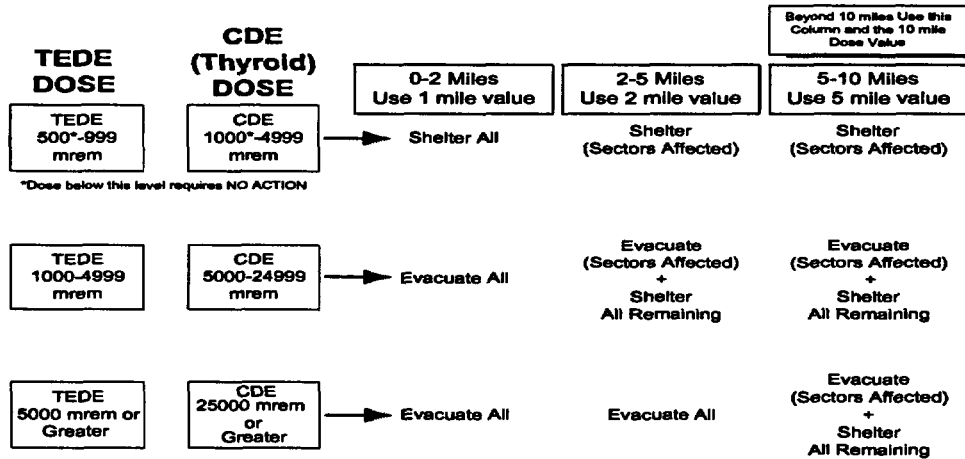
C. PAR Worksheet

- 1. Fill-in the time / date and emergency class.
- 2. In Part A, determine the most conservative PARs by comparing the PARs based on plant conditions against those based on off-site dose. It is important to compare PARs at each distance (0-2, 2-5, 5-10) because the basis of the most conservative PAR could be different at different distances.
- 3. Enter the most conservative PARs into the table in Part B, Protective Actions Recommended by FPL. Use the word(s) NONE, ALL, ALL REMAINING or list the individual affected sectors by letter.
- 4. Obtain review and approval.
- 5. Transfer the approved PARs to the Florida Nuclear Plant Emergency Notification Form.

ATTACHMENT 2
DETERMINATION OF PROTECTIVE ACTION RECOMMENDATIONS (PARs)
 (Page 4 of 5)



PARs Based on Off-Site Dose
 (For use with manual dose calculation only. Not to be completed when Class A Model is used)



Use the following terms in this table: NONE, ALL, ALL REMAINING or fill in the letters of the sectors affected.

TEDE DOSE	Miles	NO ACTION	EVACUATE	SHELTER
	0-2			
	2-5			
	5-10			
	> 10			

Use the following terms in this table: NONE, ALL, ALL REMAINING or fill in the letters of the sectors affected.

CDE (Thyroid) DOSE	Miles	NO ACTION	EVACUATE	SHELTER
	0-2			
	2-5			
	5-10			
	> 10			

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ATTACHMENT 2
DETERMINATION OF PROTECTIVE ACTION RECOMMENDATIONS (PARs)
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PAR WORKSHEET

Time / Date _____ Emergency Class: ☐ SAE ☐ GE

A. PAR Comparison

After comparing the possible recommendations from the PARs flowchart, the most conservative PARs are based on: (check one)

☐ PLANT CONDITIONS ☐ OFF-SITE DOSE

B. Protective Actions Recommended by FPL:

Use the following terms in this table: **NONE, ALL, ALL REMAINING** Or fill in the letters of the sectors affected.

	NO ACTION SECTORS	EVACUATE SECTORS	SHELTER SECTORS
0-2 miles			
2-5 miles			
5-10 miles			
10-TBD miles*			

*If necessary, add to State Notification Form.

Control Room

Signature _____
Emergency Coordinator

Technical Support Center

Signature _____
TSC EC Assistant / Logkeeper TSC HP Supervisor or TSC Chemistry Supervisor

Emergency Operations Facility

Signature _____
EOF RM OPS Advisor / Logkeeper EOF HP Manager

END OF ATTACHMENT 2

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ATTACHMENT 3
18 NRC REACTOR PLANT EVENT NOTIFICATION WORKSHEET
(Page 1 of 2)

NRC FORM 361 (12-2000)		U.S. NUCLEAR REGULATORY COMMISSION OPERATIONS CENTER	
REACTOR PLANT EVENT NOTIFICATION WORKSHEET		EN #	
NOTIFICATION TIME	FACILITY OR ORGANIZATION	UNIT	NAME OF CALLER
EVENT TIME & ZONE	EVENT DATE	POWERMODE BEFORE	POWERMODE AFTER
EVENT CLASSIFICATIONS		1-Hr. Non-Emergency 10 CFR 50.72(b)(1)	(v)(A) Safe S/D Capability AINA
GENERAL EMERGENCY GEN/AAEC	TS Deviation ADEV	(v)(B) RHR Capability AINB	
SITE AREA EMERGENCY SIT/AAEC	4-Hr. Non-Emergency 10 CFR 50.72(b)(2)	(v)(C) Control of Rad Release AINC	
ALERT ALE/AAEC	(i) TS Required S/D ASHU	(v)(D) Accident Mitigation AIND	
UNUSUAL EVENT UNU/AAEC	(iv)(A) ECCS Discharge to RCS ACCS	(xi) Offsite Medical AMED	
50.72 NON-EMERGENCY (see next columns)	(iv)(B) RPS Actuation (scram) ARPS	(xiii) Loss Comm/Asmt/Resp ACOM	
PHYSICAL SECURITY (73.71) DDDD	(x) Offsite Notification APRE	60-Day Optional 10 CFR 50.73(a)(1)	
MATERIAL/EXPOSURE B???	8-Hr. Non-Emergency 10 CFR 50.72(b)(3)	Invalid Specified System Actuation AINA	
FITNESS FOR DUTY HFIT	(ii)(A) Degraded Condition ADEG	Other Unspecified Requirement (Identify)	
OTHER UNSPECIFIED REQMT. (see last column)	(ii)(B) Unanalyzed Condition AUNA	NONR	
INFORMATION ONLY NNF	(iv)(A) Specified System Actuation AESF	NONR	

DESCRIPTION

Include: Systems affected, actuations and their initiating signals, causes, effect of event on plant, actions taken or planned, etc. (Continue on back)

NOTIFICATIONS	YES	NO	WILL BE	ANYTHING UNUSUAL OR NOT UNDERSTOOD?	<input type="checkbox"/> YES (Explain above)	<input type="checkbox"/> NO
NRC RESIDENT						
STATE(s)				DID ALL SYSTEMS FUNCTION AS REQUIRED?	<input type="checkbox"/> YES	<input type="checkbox"/> NO (Explain above)
LOCAL						
OTHER GOV AGENCIES				MODE OF OPERATION UNTIL CORRECTED:	ESTIMATED RESTART DATE:	ADDITIONAL INFO ON BACK
MEDIA/PRESS RELEASE						<input type="checkbox"/> YES <input type="checkbox"/> NO

Form # PSL-F080

EPIP-08, Off-Site Notifications and Protective Action Recommendations,
and AP 0010721, NRC Required Non-Routine Notifications and Reports

Effective Date: 08/29/03

1R6

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RADIOLOGICAL RELEASES: CHECK OR FILL IN APPLICABLE ITEMS (specific details/explanations should be covered in event description)						
<input type="checkbox"/> LIQUID RELEASE	<input type="checkbox"/> GASEOUS RELEASE	<input type="checkbox"/> UNPLANNED RELEASE	<input type="checkbox"/> PLANNED RELEASE	<input type="checkbox"/> ONGOING	<input type="checkbox"/> TERMINATED	
<input type="checkbox"/> MONITORED	<input type="checkbox"/> UNMONITORED	<input type="checkbox"/> OFFSITE RELEASE	<input type="checkbox"/> T.S. EXCEEDED	<input type="checkbox"/> RM ALARMS	<input type="checkbox"/> AREAS EVACUATED	
<input type="checkbox"/> PERSONNEL EXPOSED OR CONTAMINATED		<input type="checkbox"/> OFFSITE PROTECTIVE ACTIONS RECOMMENDED		<input type="checkbox"/> *State release path in description		
	Release Rate (Ci/sec)	% T.S. LIMIT	HOO GUIDE	Total Activity (Ci)	% T.S. LIMIT	HOO GUIDE
Noble Gas			0.1 Ci/sec			1000 Ci
Iodine			10 uCi/sec			0.01 Ci
Particulate			1 uCi/sec			1 mCi
Liquid (excluding tritium and dissolved noble gases)			10 uCi/min			0.1 Ci
Liquid (tritium)			0.2 Ci/min			5 Ci
Total Activity						
	PLANT STACK	CONDENSER/AIR EJECTOR	MAIN STEAM LINE	SG BLOWDOWN	OTHER	
RAD MONITOR READINGS						
ALARM SETPOINTS						
% T.S. LIMIT (if applicable)						

RCS OR SG TUBE LEAKS: CHECK OR FILL IN APPLICABLE ITEMS: (specific details/explanations should be covered in event description)			
LOCATION OF THE LEAK (e.g., SG #, valve, pipe, etc.)			
LEAK RATE	UNITS: gpm/gpd	T.S. LIMITS	SUDDEN OR LONG-TERM DEVELOPMENT
LEAK START DATE	TIME	COOLANT ACTIVITY AND UNITS:	PRIMARY SECONDARY

LIST OF SAFETY RELATED EQUIPMENT NOT OPERATIONAL

EVENT DESCRIPTION (Continued from front)	

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¶7 ATTACHMENT 3A
DIRECTIONS FOR COMPLETING THE NRC REACTOR PLANT
EVENT NOTIFICATION WORKSHEET
(Page 1 of 2)

A. Contact information - to be completed following contact

- 1. Name of the person contacting the NRC or other designated FPL contact.**
- 2. NRC Contacts Name - will be provided upon contact. Also obtain the event number and notification time as received from the HOO should be recorded on the top of the worksheet.**

B. Reactor Plant Event Notification Worksheet, Page 1

NOTE
The "EN #" is provided by the NRC.

- 1. Notification Time - enter the time contact is made.**
- 2. Unit - enter the appropriate unit number: Enter "0" for a classification common to both units.**
- 3. Callers Name - enter the name of the person making the call.**
- 4. Call back # - enter the number of the ENS phone that you are calling from and the commercial phone number at which you can be reached.**
- 5. Event time and Zone - enter the military time, the zone will be "EST" for Easter Standard Time or "EDT" for Eastern Daylight-savings Time.**
- 6. Event Date - enter the date the event is occurring.**
- 7. Power / Mode Before & Power / Mode After - enter the power in percent and the mode number (1-6) before and after the event.**

NOTE
Abbreviations / acronyms (e.g., UNU / AAEC, SIT / AAEC, etc.) are for NRC use only.

- 8. Event Classifications - check one of the four blocks for General Emergency, Site Area Emergency, Alert, or Notification of Unusual Event.**

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ATTACHMENT 3A
DIRECTIONS FOR COMPLETING THE NRC REACTOR PLANT
EVENT NOTIFICATION WORKSHEET
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B. (continued)

<u>NOTE</u> No other blocks in the upper half of the form are required.

9. Description - provide a written description of the event.

<u>NOTE</u> Check the blocks in the lower portion of the form based on current conditions.
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10. Mode of operation until corrected - provided if known.

11. Estimate for restart date - enter "unknown".

12. Additional info on Page 2 - enter yes or no.

C. Reactor Plant Event Notification Worksheet, Page 2

1. Fill in as much of the information on the form as is immediately available - do not create undue delay in making the notification. This information can be gained once the open line of communication is established.

D. Approval

1. Information entered on the worksheet shall be reviewed and approved by the EC or RM (if used in the EOF), prior to transmission.

2. The EC / RM may initial on the worksheet to indicate approval. There is no formal sign-off location on the worksheet.

END OF ATTACHMENT 3A