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Manager
Plant Licensing

GNRO-2004/00015

February 12, 2004

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Changes to Emergency Plan Implementing Procedures –February 12, 2004

Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29

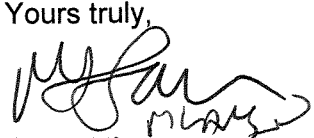
Ladies & Gentlemen:

Entergy Operations, Inc. submits in accordance with 10CFR50 Appendix E, Section V changes to the following Emergency Plan Implementing Procedure(s):

10-S-01-6	Rev. 38
10-S-01-14	Rev. 22
10-S-01-33	Rev. 12

This letter does not contain any commitments.

Yours truly,

 for C.A. Bottemiller

CAB/MJL
attachment:

1. Procedure 10-S-01-6
2. Procedure 10-S-01-14
3. Procedure 10-S-01-33

cc: (See Next Page)

cc:

Hoeg	T. L.	(GGNS Senior Resident)	(w/a)
Levanway	D. E.	(Wise Carter)	(w/a)
Reynolds	N. S.		(w/a)
Smith	L. J.	(Wise Carter)	(w/a)
Thomas	H. L.		(w/o)

U.S. Nuclear Regulatory Commission ATTN: Mr. Bruce Mallett (w/2) 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011-4005	ALL LETTERS
U.S. Nuclear Regulatory Commission ATTN: Mr. Bhalchandra Vaidya, NRR/DLPM (w/2) ATTN: FOR ADDRESSEE ONLY ATTN: U.S. Postal Delivery Address Only Mail Stop OWFN/7D-1 Washington, D.C. 20555-0001	ALL LETTERS – U.S. POSTAL SERVICE MAIL DELIVERY ADDRESS ONLY

PLANT OPERATIONS MANUAL

Volume 10
Section 01

10-S-01-6
Revision: 38
Date: 2/10/04

EMERGENCY PLAN PROCEDURE
NOTIFICATION OF OFFSITE AGENCIES AND
PLANT ON-CALL EMERGENCY PERSONNEL
SAFETY RELATED

Prepared: [Signature]
Reviewed: Richard Lunnell
Technical
Concurred: [Signature]
Manager, Operations
OSRC: M. A. Kruper
Approved: [Signature] Plant General Manager
[Signature] Manager, Emergency Preparedness

List of Effective Pages:

Page 1-17

Attachments I

List of TCNs Incorporated:

<u>Revision</u>	<u>TCN</u>	<u>Revision</u>	<u>TCN</u>
0	None	32	None
1	1	33	None
2-5	None	34	14
6	2	35	None
7	3,4,5	36	None
8-10	None	37	None
11	6	38	None
12-16	None		
17-19	None		
20	7		
21	None		
22	8,9		
23	None		
24	10		
25	None		
26	11		
27	None		
28	None		
29	12		
30	None		
31	13		

Title: Notification of Offsite Agencies and Plant On-Call Emergency Personnel	No.: 10-S-01-6	Revision: 38	Safety Evaluation
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I. OVERVIEW / SIGNATURES

Facility: GGNSDocument Reviewed: 10-S-01-6 Change/Rev. 38System Designator(s)/Description: N/ADescription of Proposed Change

Revision 38:

- Clarifies instructions on using back-up methods to communicate Emergency Notifications.
- Clarifies the requirements for notifying one agency on each row within 15 minutes of an emergency declaration or PAR development.
- Clarifies instructions for verifying communications with Mississippi Emergency Management Agency.
- Changes the name of Louisiana Office of Emergency Preparedness to Louisiana Office of Homeland Security and Emergency Preparedness.

If the proposed activity, in its entirety, involves any one of the criteria below, check the appropriate box, provide a justification/basis in the Description above, and forward to a Reviewer. No further 50.59 Review is required. If none of the criteria is applicable, continue with the 50.59 Review.

- ☐ The proposed activity is editorial/typographical as defined in Section 5.2.2.1.
- ☐ The proposed activity represents an "FSAR-only" change as allowed in Section 5.2.2.2 _____. (Insert item # from Section 5.2.2.2).

If further 50.59 Review is required, check the applicable review(s): (Only the sections indicated must be included in the Review.)

<input checked="" type="checkbox"/>	SCREENING	Sections I, II, III, and IV required
<input type="checkbox"/>	50.59 EVALUATION EXEMPTION	Sections I, II, III, IV, and V required
<input type="checkbox"/>	50.59 EVALUATION (#: _____)	Sections I, II, III, IV, and VI required

Preparer: Richard Van Den Akker [Signature] EOI/NSA-EP/ 10-15-03
Name (print) / Signature / Company / Department / Date

Reviewer: Richard Swarrall [Signature] EOI-EP 11-17-03
Name (print) / Signature / Company / Department / Date

OSRC: N/A
Chairman's Name (print) / Signature / Date
[Required only for Programmatic Exclusion Screenings (see Section 5.8) and 50.59 Evaluations.]

List of Assisting/Contributing Personnel:

Name:

Scope of Assistance:

N/A N/A

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II. SCREENING

A. Licensing Basis Document Review

1. Does the proposed activity impact the facility or a procedure as described in any of the following Licensing Basis Documents?

<i>Operating License</i>	YES	NO	<i>CHANGE # and/or SECTIONS IMPACTED</i>
Operating License	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Orders	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", obtain NRC approval prior to implementing the change by initiating an LBD change in accordance with NMM LI-113 (Reference 2.2.13). (See Section 5.1.13 for exceptions.)			

<i>LBDs controlled under 50.59</i>	YES	NO	<i>CHANGE # (if applicable) and/or SECTIONS IMPACTED</i>
FSAR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TS Bases	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Technical Requirements Manual	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Core Operating Limits Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Safety Evaluation Reports ¹	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", perform an Exemption Review per Section V <u>OR</u> perform a 50.59 Evaluation per Section VI <u>AND</u> initiate an LBD change in accordance with NMM LI-113 (Reference 2.2.13).			

<i>LBDs controlled under other regulations</i>	YES	NO	<i>CHANGE # (if applicable) and/or SECTIONS IMPACTED</i>
Quality Assurance Program Manual ²	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Emergency Plan ²	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Fire Protection Program ³ (includes the Fire Hazards Analysis)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Offsite Dose Calculations Manual	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", evaluate any changes in accordance with the appropriate regulation <u>AND</u> initiate an LBD change in accordance with NMM LI-113 (Reference 2.2.13).			

2. Does the proposed activity involve a test or experiment not described in the FSAR? ☐ Yes
☒ No
 If "yes," perform an Exemption Review per Section V OR perform a 50.59 Evaluation per Section VI.

3. Does the proposed activity potentially impact equipment, procedures, or facilities utilized for storing spent fuel at an Independent Spent Fuel Storage Installation? ☐ Yes
☐ No
☒ N/A
 (Check "N/A" if dry fuel storage is not applicable to the facility.)
 If "yes," perform a 72.48 Review in accordance with NMM Procedure LI-112.
 (See Sections 1.5 and 5.3.1.5 of the EOI 10CFR50.59 Review Program Guidelines.)

¹ If "YES," see Section 5.1.4.

² If "YES," notify the responsible department and ensure a 50.54 Evaluation is performed. Attach the 50.54 Evaluation.

³ If "YES," evaluate the change in accordance with the requirements of the facility's Operating License Condition.

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B. Basis

Provide a clear, concise basis for the answers given in the applicable sections above. Explain why the proposed activity does or does not impact the Operating License/Technical Specifications and/or the FSAR and why the proposed activity does or does not involve a new test or experiment not previously described in the FSAR. Adequate basis must be provided within the Screening such that a third-party reviewer can reach the same conclusions. Simply stating that the change does not affect TS or the FSAR is not an acceptable basis. See EOI 50.59 Guidelines Section 5.6.6 for guidance.)

Performed an on-line search of the GGNS Emergency Plan, Tech Specs, COLR, UFSAR, TRM, Operating License, NRC Orders, ODCM, Fire Protection Program and SER's for the keywords: "notification", "operational hotline", "MEMA", "Verification Call" "Louisiana Office of Emergency Preparedness" and "Mississippi Emergency Management Agency"

Searches returned no relevant hits. Neither the FSAR, the GGNS Technical Specifications or their bases discuss or refer to any activities associated with making emergency notification to the State and Local Agencies, the systems used for making those notifications or the back-up methods employed.

Therefore, this change has no impact on any Grand Gulf licensing basis documents.

This change does not involve a test or experiment nor does it impact equipment, procedures, or facilities of Grand Gulf Nuclear Station.

C. References

Discuss the methodology for performing the LBD search. State the location of relevant licensing document information and explain the scope of the review such as electronic search criteria used (e.g., key words) or the general extent of manual searches per Section 5.3.6.4 of LI-101. **NOTE: Ensure that electronic and manual searches are performed using controlled copies of documents. If you have any questions, contact your site Licensing department.**

LBDs/Documents reviewed via keyword search:

Emergency Plan, Tech Specs, COLR, UFSAR, TRM, Operating License, NRC Orders, ODCM, Fire Protection Program and SER's

Keywords:

Operational hotline, notification, Verification Call, MEMA, Louisiana Office of Emergency Preparedness, Mississippi Emergency Management Agency

LBDs/Documents reviewed manually:

- D. Is the validity of this Review dependent on ☒ Yes
any other change? (See Section 5.3.4 of the EOI ☐ No
10CFR50.59 Program Review Guidelines.)

If "Yes," list the required changes.

Emergency Plan Revision 51 - Change to Title of
LOEP

Title: Notification of Offsite Agencies and Plant On-Call Emergency Personnel	No.: 10-S-01-6	Revision: 38	Safety Evaluation
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III. ENVIRONMENTAL SCREENING

If any of the following questions is answered "yes," an Environmental Review must be performed in accordance with NMM Procedure EV-115, "Environmental Evaluations," and attached to this 50.59 Review. Consider both routine and non-routine (emergency) discharges when answering these questions.

Will the proposed Change being evaluated:

Yes No

1. ☐ ☒ Involve a land disturbance of previously disturbed land areas in excess of one acre (i.e., grading activities, construction of buildings, excavations, reforestation, creation or removal of ponds)?
 2. ☐ ☒ Involve a land disturbance of undisturbed land areas (i.e., grading activities, construction, excavations, reforestation, creating, or removing ponds)?
 3. ☐ ☒ Involve dredging activities in a lake, river, pond, or stream?
 4. ☐ ☒ Increase the amount of thermal heat being discharged to the river or lake?
 5. ☐ ☒ Increase the concentration or quantity of chemicals being discharged to the river, lake, or air?
 6. ☐ ☒ Discharge any chemicals new or different from that previously discharged?
 7. ☐ ☒ Change the design or operation of the intake or discharge structures?
 8. ☐ ☒ Modify the design or operation of the cooling tower that will change water or air flow characteristics?
 9. ☐ ☒ Modify the design or operation of the plant that will change the path of an existing water discharge or that will result in a new water discharge?
 10. ☐ ☒ Modify existing stationary fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)?¹
 11. ☐ ☒ Involve the installation of stationary fuel burning equipment or use of portable fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)?¹
 12. ☐ ☒ Involve the installation or use of equipment that will result in an air emission discharge?
 13. ☐ ☒ Involve the installation or modification of a stationary or mobile tank?
 14. ☐ ☒ Involve the use or storage of oils or chemicals that could be directly released into the environment?
 15. ☐ ☒ Involve burial or placement of any solid wastes in the site area that may affect runoff, surface water, or groundwater?
-

¹ See NMM Procedure EV-117, "Air Emissions Management Program," for guidance in answering this question.

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IV. SECURITY PLAN SCREENING

If any of the following questions is answered "yes," a Security Plan review must be performed by the Security Department to determine actual impact to the Plan and the need for a change to the Plan.

A. Could the proposed activity being evaluated:

Yes No

1. ☐ ☒ Add, delete, modify, or otherwise affect Security department responsibilities (e.g., including fire brigade, fire watch, and confined space rescue operations)?
2. ☐ ☒ Result in a breach to any security barrier(s) (e.g., HVAC ductwork, fences, doors, walls, ceilings, floors, penetrations, and ballistic barriers)?
3. ☐ ☒ Cause materials or equipment to be placed or installed within the Security Isolation Zone?
4. ☐ ☒ Affect security lighting by adding or deleting lights, structures, buildings, or temporary facilities?
5. ☐ ☒ Modify or otherwise affect the intrusion detection systems (e.g., E-fields, microwave, fiber optics)?
6. ☐ ☒ Modify or otherwise affect the operation or field of view of the security cameras?
7. ☐ ☒ Modify or otherwise affect (block, move, or alter) installed access control equipment, intrusion detection equipment, or other security equipment?
8. ☐ ☒ Modify or otherwise affect primary or secondary power supplies to access control equipment, intrusion detection equipment, other security equipment, or to the Central Alarm Station or the Secondary Alarm Station?
9. ☐ ☒ Modify or otherwise affect the facility's security-related signage or land vehicle barriers, including access roadways?
10. ☐ ☒ Modify or otherwise affect the facility's telephone or security radio systems?

The Security Department answers the following questions if one of the questions was answered "yes".

B. Is the Security Plan actually impacted by the proposed activity?

- ☐ Yes
☐ No

C. Is a change to the Security Plan required?

- ☐ Yes Change # (optional) _____
☐ No

N/A

Name of Security Plan reviewer (print) / Signature / Date

	NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED	EP-305 REV. No. 0
		INFORMATION USE	Page 8 of 11

ATTACHMENT 9.1

10CFR50.54(q) SCREENING

1. DOCUMENT INFORMATION

Procedure/Document Number:	Proc./Doc. Revision: 10-S-01-06
Document Title: Notification of Offsite agencies and Plant On-Call Personnel.	
Brief Description of Proposed Revision:	
10-S-01-06 "Notification of Offsite agencies and Plant On-Call Personnel." is being revised to : <ul style="list-style-type: none"> • Clarify instructions on using back-up methods to communicate Emergency Notifications. • Clarify the requirements for notifying one agency on each row within 15 minutes of an emergency declaration or PAR development. • Clarify instructions for verifying communications with Mississippi Emergency Management Agency. • Changes Louisiana Office of Emergency Preparedness to Louisiana Office of Homeland Security and Emergency Preparedness 	




2. SCREENING

A.) Does the proposed revision require a change to the Emergency Plan, change a commitment in the E-plan, or potentially decrease the effectiveness of the E-plan? ___ Yes <u>X</u> No
B.) Does the proposed revision change the site Emergency Action Levels (EALs)? ___ Yes <u>X</u> No
If the answer to either question is YES, then a 10CFR50.54(q) evaluation must be performed. See attachment 9.2. If the answer is NO provide justification below.

3. Justification for "NO" Answers

The change to the title of LOEP is consistent with revision 51 of the GGNS Emergency Plan.
All other changes being made to this procedure are consistent with the current revision of the GGNS Emergency Plan, and are being made to clarify instructions for making notifications to offsite agencies.


4. APPROVAL




Screening Prepared By: 	10-24-03
Screening Reviewed By: 	11-24-03
Screening Approved By: 	11-24-03

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RPTS FORM

10CFR50.59 Review Required?	(x) Yes	If Yes, attach 50.59 Review Form
	() No	Not required per LI-101

Cross-Discipline review required?	(x) Yes	(Note affected Departments Below)
	() No	
Preparer Initials>>> 		

Department Cross-Discipline Reviews Needed	Signoff (signed, electronic, telcon)
TSC Communicator Lead	 For Tom Thurman per Telcon 1-12-04
EOF Communicator Lead	 For Bob Boone per Telcon 11-25-03
Admin Director Lead	 For Joe Gaska per Telcon 1-12-04

Does this directive contain Tech Spec Triggers? () YES (X) NO

REQUIREMENTS CROSS-REFERENCE LIST

Requirement Implemented	by Directive	Directive Paragraph Number
Name	Paragraph Number	That Implements Requirement
10CFR50	72.A.4	6.4.2
AECM 84/0397	Page 2, Para.1	2.4.1, 6.6.4
AECM 84/0397	Page 1, S2 Item 1	6.6.3
GGNS Emer Plan	3.3.S3, S4	2.3.S1,S2
GGNS Emer Plan	5.7.5.S5	6.1.1.c (Note)S2
GGNS Emer Plan	6.2.4.S3	6.1.1.c
GGNS Emer Plan	6.2.4.S4 & S5	6.1.1.a
GGNS Emer Plan	6.2.4.S6	6.1.1.b(2), 6.1.1.c(Note)
GGNS Emer Plan	6.2.4.S9 & S10	2.3
GGNS Emer Plan	7.5.3a.2.e	6.4.2
GGNS Emer Plan	7.5.3.b	6.3.2
GGNS Emer Plan	7.5.S6	6.1.1.d
GGNS Emer Plan	8.8.S4	6.6
GGNS Emer Plan	8.8.S5	6.1.1.a.1
GIN-95/02001	*	6.6.3
GNRI-94/00122	NRC AL 94-04	6.4.1.b, 6.4.5.d.S2
CR-GGN-2003-2798	CA #3	6.3

* Covered by directive as a whole or by various paragraphs of the directive.

NOTE

The Component Database Change Request statement is applicable only to Volume 06 and 07 maintenance directives.

Component Database Change Request generated and the backup documentation available for setpoint and/or calibration data only ☐ Yes ☒ N/A CDBCR # _____

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Current Revision Statement

Revision 38:

- Clarifies instructions on using back-up methods to communicate Emergency Notifications.
- Clarifies the requirement to contact at least one agency in each row within 15 minutes of an emergency declaration or PAR development.
- Clarifies instructions for verifying communications with Mississippi Emergency Management Agency.
- Changes Louisiana Office of Emergency Preparedness to Louisiana Office of Homeland Security and Emergency Preparedness.

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1.0 PURPOSE AND DISCUSSION

1.1 Purpose

1.1.1 This procedure:

- a. Describes emergency notification responsibilities and sequences.
- b. Provides instructions for Operational Hot Line usage.
- c. Provides instructions for emergency notification to Nuclear Regulatory Commission, Offsite Agencies and Plant personnel.
- d. Provides instructions for augmenting personnel as necessary.

2.0 RESPONSIBILITIES

2.1 Communicators - Are responsible for:

- #### 2.1.1
- Completing all required communications in accordance with this procedure.

2.2 Emergency Response Organization Personnel - Are responsible for:

- #### 2.2.1
- Wearing personal PAGER during their on-call week and responding appropriately to pages received.

NOTE

Emergency Response Organization personnel are requested to wear their pagers at all times.

- #### 2.2.2
- Conducting a pager test weekly when on-call.

- #### 2.2.3
- Notifying Emergency Preparedness when a personal pager is inoperable or lost.

2.3 On-Call Manager - May report to the plant to assume the position of Emergency Director, upon notification of an Unusual Event, if he deems it necessary. Upon notification of an Alert or higher emergency classification, the On-Call Manager reports to the plant to assume the position of Emergency Director.

He then activates the appropriate portion of the Emergency Organizations if that has not already been done by the Shift Manager. In any case, the Offsite Emergency Coordinator is notified.

2.4 Radiation Protection Manager/Radiation Emergency Manager - Is responsible for:

- #### 2.4.1
- Verbal notification to state Radiological Assessment officer (SRAO), when trigger points are reached. (Refer to 10-S-01-12.)

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2.5 Shift Manager/Emergency Director/Offsite Emergency Coordinator - Is responsible for:

2.5.1 Implementing this procedure.

2.5.2 Notification of Offsite Agencies, NRC, Plant personnel, and Plant On-Call personnel in accordance with this procedure.

3.0 REFERENCES

3.1 Emergency Plan Procedure 10-S-01-11, Evacuation of Onsite Personnel

3.2 Emergency Plan Procedure 10-S-01-12, Radiological Assessment and Protective Action Recommendations

3.3 Company Procedure NS-102, Fitness for Duty

4.0 ATTACHMENTS

4.1 Attachment I - Paging Instructions

5.0 DEFINITIONS

5.1 BEOF - Backup EOF

5.2 ENS - Emergency Notification System

5.3 EOC - Emergency Operations Center

5.4 EOF - Emergency Operations Facility

5.5 EPP - Emergency Plan Procedure

5.6 ERDS - Emergency Response Data System

5.7 HPN - Health Physics Network

5.8 Initiate- For sites with multiple agencies to notify, the notification is considered to be initiated when verbal contact is made with the first agency.

5.9 NRC - Nuclear Regulatory Commission

5.10 OEC - Offsite Emergency Coordinator

5.11 OHL - Operational Hot Line

5.12 On-Call Manager - GGNS Manager or designated alternate

5.13 On-Call Personnel - Personnel meeting current training requirements and assigned to emergency organization positions

5.14 PDS - Plant Display System Computer Terminal

5.15 QA - Quality Assurance

5.16 REM - Radiation Emergency Manager

5.17 RPM - Radiation Protection Manager

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5.18 SRAO - State Radiological Assessment Officer

5.19 TSC - Technical Support Center

5.20 VIP 2000 - A computer emergency notification system used to contact on-call personnel in an emergency

6.0 DETAILS

6.1 Notification of Offsite Agencies

6.1.1 Shift Manager/Emergency Director/Offsite Emergency Coordinator takes action to:

- a. Complete a Notification Form. The Emergency Notification Form is included as part of the EP Forms Control Process (EPP 06-01) and copies of this notification form are available in the Control Room, TSC, EOF, and BEOF.

- (1) Messages to State and Local authorities shall include information concerning Recommended Protective Actions.

NOTE

The Emergency Director/OEC must approve all Notification forms before transmittal to Offsite Agencies.

- b. Assign communicators to notify the:

- (1) State and local agencies using the OHL.
- (2) NRC Operations Center using ENS.

NOTE

NRC headquarters may require continuous Communications be maintained on the ENS.

It is extremely important to provide PROMPT NOTIFICATION to the Offsite Agencies to protect the Public.

- c. Notify State and Local Agencies. Shift Manager/Emergency Director/Offsite Emergency Coordinator shall ensure that notification is initiated to at least one of the state and local agencies in each five rows listed below within 15 minutes of an emergency declaration or PAR development.

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6.1.1.c (Continued)

	Primary	Secondary
Row 1	Mississippi Emergency Management Agency	Mississippi Highway Patrol
Row 2	Louisiana Office of Homeland Security and Emergency Preparedness	Louisiana Department of Environmental Quality
Row 3	Claiborne County Sheriff's Department	Claiborne County Civil Defense
Row 4	Tensas Parish Sheriff's Department	None
Row 5	Port Gibson Police Department	None

- d. During the initial notification Mississippi Emergency Management Agency (MEMA) may request verification that it is actually Grand Gulf on the phone. To verify your identity:

- (1) Obtain the GGNS Monthly Authentication Matrix envelope from the Emergency Facility Phone Book located in the Control Room.
- (2) Look up the correct password in the matrix and provide it to MEMA.

NOTE

The NRC shall be notified of the declaration of the Emergency IMMEDIATELY AFTER THE NOTIFICATION OF STATE AND LOCAL AGENCIES and not later than one hour after the Emergency declaration. An open channel shall be maintained until terminated by the NRC.

- e. If an ALERT or higher classification has been declared, activate ERDS, in accordance with 6.4.2.
- f. For Unusual Events, Offsite Agencies need only be advised initially, a followup Notification is performed one hour later, with a final Notification upon termination of the event unless significant changes occur which may lead to escalation.

6.2 Operational Hotline Activation6.2.1 Communicator must:NOTE

To minimize delays in performing notifications you may activate the Operational Hotline while the notification form is in the review process.

When activating the Operational Hotline during the review Process do not activate too early or agencies may be unable to stay on the phone.

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6.2.1 (Continued)

NOTE

If the operational Hotline does not work go to section 6.3

- a. Locate OHL phone and lift receiver. When the receiver is lifted, the phone automatically rings at all the agencies.
- b. Wait 30 seconds for agencies to come on line. (An occasional "Grand Gulf Standby" may be used during this period to let them know that the hotline is in operation).
- c. Agencies answering will indicate their presence by stating their name. You may check them off of the roll call at this time. If at least one agency from each of the five rows listed in 6.1.1.c answers you may record the time of notification on the notification form.
- d. Depress the pushbutton on receiver to talk, release button to listen.
- e. Announce "THIS IS GRAND GULF NUCLEAR STATION. THIS IS AN EMERGENCY NOTIFICATION. STANDBY FOR AN INITIAL ROLL-CALL."
- f. Perform initial roll call as follows:
 - (1) Read agency names for all agencies not already checked off in step 6.2.1.c.
 - (2) Check off the responding agencies.
 - (3) If at least one agency from each of the five rows listed in 6.1.1.c answers record the time of notification on the notification form, if not already done.

NOTE

The notification time is not recorded until at least one agency from each of the five rows listed in 6.1.1.c answers. If neither agency from one or more rows does not answer the initial roll call you should have another communicator attempt contacting them immediately.

- g. Read Notification Form Items 1 through 13. Read slowly and deliberately because the agencies must copy the message word for word.

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6.2.1.g (Continued)

NOTE

Occasionally, an agency may interrupt your message with a question or a request to repeat information. Inform the agency to stand by until you have completed the Message.

h. Address agency questions as follows:

- (1) Announce, "THIS IS GRAND GULF NUCLEAR STATION, ARE THERE ANY QUESTIONS?"
- (2) Re-read requested information from notification form.
- (3) If requested information is not on the notification form, record the request and inform the Emergency Director/Offsite Emergency Coordinator.

i. Perform final roll call as follows:

- (1) Read all agency names.
- (2) Check off the responding agencies.

NOTE

If neither primary nor secondary agencies answer the FINAL ROLL CALL, notify at least one of the agencies by commercial telephone. (Phone numbers are on form.)

NOTE

Ensure all completed Emergency Notification forms are faxed to the other Emergency Response Facilities, if activated.

6.3 Backup Communications

- 6.3.1 If Operational Hot Line (primary means of notifying Offsite Agencies) is inoperative you should use the following methods, in the order listed, to make the notification.

a. Commercial telephone (Conference Call)

- (1) Use the multi-line phones with pre-programmed numbers.
- (2) Follow posted instructions to conference in up to six agencies.

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6.3.1.s.(2) (Continued)

NOTE

The first call should include one agency from each row in section 6.1.1.c.

(3) Perform steps 6.2.1.d through i.

(4) Repeat steps (2) and (3) for remaining agencies.

b. Commercial Phone

(1) Dial 9 + number to contact agencies individually.

(2) Perform steps 6.2.1.g through h.

(3) Repeat steps (1) and (2) for remaining agencies.

c. Satellite telephone or Entergy Fiber Optic lines

(1) Dial 74 + 9 + number for local calls, 9 + 1 + number for long distance calls to contact each agency.

(2) Perform steps 6.2.1.g through h.

(3) Repeat steps (1) and (2) for remaining agencies.

6.3.2 IF ALL TELEPHONE SYSTEMS DO NOT WORK, provide notification by UHF radio located in the TSC, EOF, SAS, or CAS, to the Claiborne County Sheriff's Office, Tensas Parish Sheriff's Office, and Claiborne County Civil Defense (if available).

a. Activate tone receiver to local agencies using the instructions posted near the radio.

b. Establish communications using radio Channel 8.
REQUEST THE TWO LOCAL AGENCIES TO NOTIFY THE STATE AGENCIES OF THE EMERGENCY SITUATION AND TO PROVIDE THEM WITH ALL OF THE EMERGENCY INFORMATION.

c. Perform Step 6.2.1.g through h.

6.4 NRC Emergency Telecommunications System (ETS)6.4.1 Activation of ENS

a. Lift the receiver on the phone marked "ENS" and listen for a dial tone.

b. Dial the number listed below

Main: 1 (301) 816-5100

Back-up: 1 (301) 951-0550
1 (301) 415-0550

FAX: 1 (301) 816-5151

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6.4.1 (Continued)

- c. The above numbers may also be called from any commercial telephone.

6.4.2 Activation of ERDS

- a. ERDS shall be activated as soon as possible but not later than one hour after declaring an emergency class of Alert, Site Area Emergency, or General Emergency.
- b. Locate PDS terminal in Control Room, normally at the Shift Manager's desk. Monitor is normally on at all times.
- c. Ensure that mouse arrow is on the background of the screen and press the left mouse button to make the ROOT MENU appear.
- d. Hold down the mouse button and move the mouse arrow to the ERDS indicator and release the mouse button. The ERDS menu appears on the screen.
- e. Initiate the data transfer by selecting the START TRANSFER indicator on the menu with the mouse arrow. Press and release the left mouse button.
- f. The rest of the ERDS initiation process is automatic. If ERDS fails to connect with the NRC Operations Center, it automatically retries until a connection is made.
- g. If the ERDS connection fails or data transfer fails for any reason, a failure message appears on the ERDS menu. Repeat step D to attempt to connect ERDS to the NRC and notify the Nuclear Computer Information System Group. The NRC should be advised of the ERDS failure as soon as possible.

NOTE

DO NOT terminate the ERDS data transfer until requested to do so by the NRC.

- h. To terminate the data transfer, put the mouse pointer arrow on the word TERMINATE TRANSFER on the ERDS menu and press and release the left mouse button. The connection automatically terminates.
- i. The CLOSE SESSION indicator is used to exit ERDS.

6.4.3 Problems with ENS

- a. Any problems with the ENS must be reported to the NRC. If unable to contact the NRC on the ENS, report problems via commercial telephone. The commercial NRC phone number is 1 (301) 951-0550.
- b. A Helpdesk case should also be initiated for any problems with the ENS.

6.4.4 Attempt to notify the NRC Resident Inspector by telephone for all emergencies. Work and home phone numbers are listed on the Emergency Notification Form.

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6.4.5 The following additional NRC communication links are available in the TSC and EOF:

- a. Health Physics Network (HPN) - Permits licensee personnel to transmit health physics and environmental information to the NRC Operations Center. NRC headquarters may require continuous communication be maintained on the HPN.
- b. Reactor Safety Counterpart Link (RSCL)
- c. Protective Measures Counterpart Link (PMCL)
- d. Management Counterpart Link (MCL)

Any of these communication links may be established by lifting the receiver on the appropriately marked phones and dialing:

- 1 (301) 816-5100
- 1 (301) 951-0550

NOTE

Each phone can be identified by a label located on the front of the phone.

6.5 Notification of Plant Personnel (CONTROL ROOM ACTIONS)

- 6.5.1 Plant personnel are notified via PA System concerning the nature and location of event.
- 6.5.2 Plant personnel are advised via PA System of emergency actions to be taken concerning event.
- 6.5.3 If plant conditions require evacuation of plant personnel, notifications/announcements are made in accordance with 10-S-01-11, Evacuation of Onsite Personnel.

NOTE

For security emergencies, inform all personnel to take shelter, to NOT move around in the plant, and to man only those emergency facilities which are necessary and that don't pose a risk to personnel.

- 6.5.4 After TSC is operable, PA announcements are made by TSC Communicator.

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6.6 Additional Notification of Offsite Agencies

- 6.6.1 After TSC/EOF activation, hard copies of previous Notification Forms are transmitted to designated Offsite Agencies via the facsimile when time allows.
- 6.6.2 Within 30 minutes of issuing a Protective Action Recommendation (PAR), the Emergency Director/Offsite Emergency Coordinator, or designee, contacts the Mississippi and Louisiana State Emergency Operations Directors to ascertain the status of the recommended PAR.
- 6.6.3 Frequent Update
- a. The Emergency Director/Offsite Emergency Coordinator shall ensure that frequent updates are provided to Offsite Agencies as new operational and radiological information becomes available via the Notification Form.
- (1) With the exception of an Unusual Event, (see Step 6.1.1e) the Notification Forms must be filled out and transmitted approximately every 60 minutes, or sooner if information becomes available. The 60 minutes starts when the communicator initiates the notification. Notification Forms should be numbered consecutively to prevent transmittal sequence errors.
- 6.6.4 RPM/REM verbally contacts SRAO at least hourly or sooner if plant or radiological conditions change significantly.
- a. Within 60 minutes of exceeding a SRAO trigger point, the SRAO should be contacted by telephone. If the SRAO trigger point results in a PAR, an Emergency Notification Form must be completed in accordance with Section 6.1.

6.7 Notification of Plant On-Call Personnel

NOTE

In the event of Security emergencies, each Security related incident should be evaluated. Only those support groups and facilities which are needed should be activated, regardless of the emergency or the emergency classification, so as to minimize the risk to personnel. Utilization of the ERO call tree rather than VIP 2000 may be required to inform responders of emergency situation and prevent manning of unneeded facilities.

6.7.1 Activation of VIP 2000:

NOTE

Password and activation instructions are maintained in an envelope labeled "VIP 2000 Activation Instructions", in the On-Call Notification Book in the Control Room and Technical Manager's Logbook in the TSC.

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6.7.1 (Continued)

- a. Activate VIP 2000 by calling 9-437-8155.
- b. Enter VIP 2000 password while the following message is being spoken.
- c. The VIP 2000 says; "Hello, this is the Grand Gulf Nuclear Station's Emergency Notification System."
 - (1) If the VIP 2000 says; "There is no activity at this time" and hangs up, you did not enter the password soon enough.
 - (2) Return to Step 6.7.1a and try again.
- d. VIP 2000 says; "Enter the scenario number you want to work with." Enter the correct scenario from the list below:

EMERGENCY CLASSIFICATION	SCENARIO(S) TO BE ACTIVATED
Unusual Event	01
Alert	02
Site Area Emergency	03
General Emergency	04
TSC & OSC Activation	07
EOF Activation	08

- e. VIP 2000 says; "That scenario is completed/suspended/idle. Do you want to queue it? Please press 9 for Yes, 6 for No."
 - (1) Press 9 to queue scenario.
- f. VIP 2000 says; "Enter scenario status, press 1 for emergency, 2 for test, and 3 for drill."
 - (1) Press 1 for emergency, 2 for test, or 3 for drill.
- g. VIP 2000 says; "You have requested to start scenario _____ as an emergency/drill/test. Are you sure this is what you want to do? Please press 9 for Yes, 6 for No."
 - (1) If correct, press 9; VIP 2000 says; "Your request has been honored. Thank you. Goodbye."
 - (2) If incorrect, press 6; VIP 2000 says; "Thank you. Goodbye." Return to Step 6.7.1.a

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6.7.1 (Continued)

NOTE

Additional notifications with the VIP 2000 are Required if event is upgraded from an Unusual Event Classification. No additional notification via VIP 2000 is required if the event is upgraded from an Alert or Site Area Emergency.

- h. If additional notifications are required, repeat Steps 6.7.1.a through 6.7.1.g.

6.7.2 VIP 2000 Operation Verification MethodNOTE

There are three different methods to verify that the VIP 2000 is operating. Only one method is required to be used to verify operation. The method used is determined by the individual.

- a. Proper operation of the VIP 2000 can be verified by one of the following methods:

(1) Method I:

- (a) Approximately four to five minutes after activation, the VIP 2000 transmits a *Scenario Execution Log* report to the Control Room and TSC facsimile. The report should indicate the date and time the requested scenario went active. The report may also indicate the mode (Emergency, Drill or Test) the VIP 2000 is operating.
- (b) If the report does not indicate that the requested scenario is active, the VIP 2000 is not operating properly. Go to Step 6.7.3.
- (c) If the report indicated the VIP 2000 is operating in the wrong mode, call the VIP 2000 9-437-8155.
 - 1) Enter the VIP 2000 password while the Hello message is being spoken.
 - 2) If the VIP 2000 says, *Please enter your ID code.* *You failed to enter the password in time.*...Hang up and try again.
 - 3) When the VIP 2000 says, *Enter the scenario number you want to work with.* Enter the scenario number that was queued in the wrong mode.

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6.7.2 (Continued)

- 4) The VIP 2000 says, *That scenario is active.*
Press 1 to complete, 2 to suspend or 3 to exit.
 - a) Press 1 to complete.
- 5) When the VIP 2000 says, *You have requested to complete scenario _____, are you sure this is what you want to do.* Press 9 for yes and 6 for no.*
 - a) Press 9 for yes.
- 6) VIP 2000 says *that scenario has been completed. Thank you. Good-bye.*
- 7) Call the VIP 2000 and activate the scenario in the proper mode in accordance with 6.7.1.

(2) Method II:

- (a) Approximately eight minutes after activation, the VIP 2000 transmits an *Execution Roster - Qualified Members Only* report to the TSC facsimile. The report should show that positions are being filled and who is filling those positions.
- (b) If the report does not show the positions are being filled, the VIP 2000 is not operating properly. Go to Step 6.7.3.

(3) Method III:

- (a) Wait approximately five minutes after activation. Call VIP 2000 at 9-437-8155, and respond to the VIP 2000 in accordance with Step 6.7.5 using "123456789" as your ID code.
- (b) If the VIP 2000 does not tell you that you are filling your position as Shift Superintendent, the VIP 2000 is not operating properly. Go to Step 6.7.3.

6.7.3 Back-up Notification Method (Group Page)

- a. If the VIP 2000 operation cannot be verified, initiate the two group pages as follows:

NOTE

Initiate both group pages to notify the entire ERO. Instructions and passwords are maintained in an envelope Labeled "VIP 2000 ACTIVATION INSTRUCTIONS", in the On-Call Notification Book in the Control Room and Technical Manager's logbook in the TSC.

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6.7.3 (Continued)

- (1) Call the Group Page Number 9-930-8075. Enter password when requested.
- (2) The recording says; "This is a display beeper, please enter your phone number at the sound of the tone."
- (3) At the tone, enter the appropriate code to activate personnel response:
 - 88*01 Emergency - Unusual Event
 - 88*02 Emergency - Alert
 - 88*03 Emergency - Site Area Emergency
 - 88*04 Emergency - General Emergency
 - 77*01 Drill - Unusual Event
 - 77*02 Drill - Alert
 - 77*03 Drill - Site Area Emergency
 - 77*04 Drill - General Emergency
- (4) After entering code, hang up.
- (5) Call the Group Page number 9-930-8074. Enter the password when requested.
- (6) Repeat step 2, 3, and 4.
- (7) The paging system initiates a page to all emergency response organization pagers.

6.7.4 Other Personnel Notification Method

- a. If the VIP 2000 is inoperative and group paging is unavailable, notification is made by phone or pager to those persons listed on the Emergency Response Organization Call Tree located in the On-Call Notification Book or Emergency Telephone Book.
- b. Additional Emergency Response personnel should be called as soon as possible to fill additional positions. Names and telephone numbers of persons in the ERO are in Section B of the Emergency Telephone Book.

6.7.5 Responding to VIP 2000 Phone CallNOTE

If you are notified by or call into the VIP 2000, you should respond to the questions asked by the VIP 2000. It needs to know if and when you can report to your Emergency Response Facility to assume your emergency position.

- a. When you answer the phone, the VIP 2000 says; "Hello, this is Grand Gulf Nuclear Station's Emergency Notification System. Please enter your ID code." Enter your social security number.

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6.7.5 (Continued)

NOTE

If the VIP 2000 says, "You have entered an Invalid ID Code, and hangs up, call the VIP 2000 back at 437-8155 and try again.

- b. VIP 2000 says; "This is an emergency/a drill/only a test".

NOTE

If your position has been filled, VIP 2000 says; "Your Position has been filled," and hangs up.

- c. If an EMERGENCY has been declared, or a DRILL is being conducted, VIP 2000 says; "An Unusual Event/Alert/Site Area Emergency/General Emergency has been declared at Grand Gulf," and ask you the following questions:

- (1) "Are you fit for duty? Press 9 for Yes, 6 for No."
- (a) If you are fit for duty in accordance with Entergy Procedure OM-105, press 9 for Yes.
- (b) If you are not fit for duty in accordance with the above procedure, press 6 for No.

NOTE

If you enter 6 in response to the above question, VIP 2000 says; "Thank you, goodbye," and hang up.

- (2) "Enter your estimated time of arrival in four-digit military time."
- (a) Enter estimated time of arrival. Examples: 4 a.m. would be entered as 0400 and 4 p.m. would be entered as 1600.
- (3) VIP 2000 says; "Report to your emergency response facility. You are filling your Emergency Response position as (name of your position), thank you, goodbye," and hang up.
- d. If a TEST is being conducted, the VIP 2000 asks the following questions:
- (1) "If this were an actual emergency, could you respond? Press 9 for Yes, 6 for No."
- (a) If you would be able to respond, press 9.
- (b) If you would not be able to respond, press 6.

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6.7.5 (Continued)

- (2) "If this were an actual emergency and you were responding, estimate your time of arrival and enter it in four-digit military time."
- (a) Enter your estimated arrival time. Examples: 4 a.m. would be entered as 0400, 4 p.m. would be entered as 1600.
- (3) VIP 2000 says; "You are filling your Emergency Response position as (name of your position), thank you, good-bye," and hang up.

6.7.6 Response to Pager

- a. When your pager beeps (or vibrates), depress the read button on the pager.
- b. Observe the telephone number or code displayed in the pager window.
- c. If the telephone number, 437-8155, is displayed, call this number as soon as possible and provide the requested information. (This is the telephone number for the VIP 2000.)
- d. If one of the following codes is displayed, respond as indicated in the table below:

CODE	MEANING	RESPONSE
88-01	Emergency - Unusual Event	Await further notification.
88-02	Emergency - Alert	All personnel report to your emergency response facility.
88-03	Emergency - Site Area Emergency	All personnel report to your emergency response facility.
88-04	Emergency - General Emergency	All personnel report to your emergency response facility.
77-01	Drill - Unusual Event	Await further notification.
77-02	Drill - Alert	All personnel report to your emergency response facility.
77-03	Drill - Site Area Emergency	All personnel report to your emergency response facility.
77-04	Drill - General Emergency	All personnel report to your emergency response facility.
66-06	Test - All Clear	This is a test. No response required.

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6.8 Records and Information

- 6.8.1 Forms and paperwork generated by this procedure during EMERGENCIES are retained for information, event reconstruction and submitted to the Manager, Emergency Preparedness to be filed as a Quality Assurance record.

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PAGING INSTRUCTIONSINDIVIDUAL PAGE

- A. On a touch tone phone, dial the number of the desired pager.
- B. The recording says, "Please enter the phone number you wished displayed".
 - (1) Immediately following the tone, dial the number you want displayed on the pager.
- C. The recording says, "Thank you" and you hear a busy signal.
- D. Hang up telephone receiver.
- E. When pager responds (beeps or vibrates), verify the number you entered is displayed in the pager window.

PLANT OPERATIONS MANUAL

Volume 10
Section 01

10-S-01-14
Revision: 22
Date: 2/10/04

EMERGENCY PLAN PROCEDURE

EMERGENCY RADIOLOGICAL MONITORING

SAFETY RELATED

Prepared: Richard Sumrall
Reviewed: [Signature]
 Technical
Concurred: [Signature]
 Manager, Operations
OSRC: M. A. Krueger
Approved: J. Brad Edwards [Signature]
 Plant General Manager Manager, Emergency Preparedness

List of Effective Pages:

Pages 1-6

List of TCNs Incorporated:

<u>Revision</u>	<u>TCN</u>
0-14	None
15	1
16-22	None

Title: Emergency Radiological Monitoring	No.: 10-S-01-14	Revision: 22	Safety Evaluation
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I. OVERVIEW / SIGNATURESFacility: GGNSDocument Reviewed: 10-S-01-14 Change/Rev. 22System Designator(s)/Description: N/A**Description of Proposed Change**

Adds commitment to GNRI-03/00066 Section 4.3 as required by WT-GGN-2003-0000 CA 496 to implement License Amendment 158. Changes cubic feet and CFM to liters and LPM. All ENS air sampling instruments are now calibrated in liters (EPATS 1580). Adds instructions for determination of Plume Characterization (Section 6.3) (EPATS 1376).
•Updates references.

If the proposed activity, in its entirety, involves any one of the criteria below, check the appropriate box, provide a justification/basis in the Description above, and forward to a Reviewer. No further 50.59 Review is required. If none of the criteria is applicable, continue with the 50.59 Review.

- ☐ The proposed activity is editorial/typographical as defined in Section 5.2.2.1.
- ☐ The proposed activity represents an "FSAR-only" change as allowed in Section 5.2.2.2_____.
(Insert item # from Section 5.2.2.2).

If further 50.59 Review is required, check the applicable review(s): (Only the sections indicated must be included in the Review.)

<input checked="" type="checkbox"/>	SCREENING	Sections I, II, III, and IV required
<input type="checkbox"/>	50.59 EVALUATION EXEMPTION	Sections I, II, III, IV, and V required
<input type="checkbox"/>	50.59 EVALUATION (#: _____)	Sections I, II, III, IV, and VI required

Preparer: Richard Sumrall / *Richard Sumrall* / EOI / EP / 1/20/04
Name (print) / Signature / Company / Department / Date

Reviewer: Richard VanDyke / *Richard VanDyke* / EOI / EP / 1-26-04
Name (print) / Signature / Company / Department / Date

OSRC N/A
Chairman's Signature / Date
[Required only for Programmatic Exclusion Screenings (see Section 5.9) and 50.59 Evaluations.]

List of Assisting/Contributing Personnel:

Name:

Mike Larson (Licensing)

Scope of Assistance:

Interpretation of UFSAR Table 12.5-1 requirements

Title: Emergency Radiological Monitoring	No.: 10-S-01-14	Revision: 22	Safety Evaluation
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II. SCREENING**A. Licensing Basis Document Review**

1. Does the proposed activity impact the facility or a procedure as described in any of the following Licensing Basis Documents?

<i>Operating License</i>	YES	NO	<i>CHANGE # and/or SECTIONS TO BE REVISED</i>
Operating License	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Orders	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", obtain NRC approval prior to implementing the change by initiating an LBD change in accordance with NMM LI-113 (Reference 2.2.13). (See Section 5.1.13 for exceptions.)			

<i>LBDs controlled under 50.59</i>	YES	NO	<i>CHANGE # and/or SECTIONS TO BE REVISED</i>
FSAR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TS Bases	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Technical Requirements Manual	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Core Operating Limits Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Safety Evaluation Reports ¹	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", perform an Exemption Review per Section V <u>OR</u> perform a 50.59 Evaluation per Section VI <u>AND</u> Initiate an LBD change in accordance with NMM LI-113 (Reference 2.2.13).			

<i>LBDs controlled under other regulations</i>	YES	NO	<i>CHANGE # and/or SECTIONS TO BE REVISED</i>
Quality Assurance Program Manual ²	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Emergency Plan ²	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Fire Protection Program ³ (includes the Fire Hazards Analysis)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Offsite Dose Calculation Manual ³	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", evaluate any changes in accordance with the appropriate regulation <u>AND</u> initiate an LBD change in accordance with NMM LI-113 (Reference 2.2.13).			

2. Does the proposed activity involve a test or experiment not described in the FSAR? ☐ Yes
☒ No
If "yes," perform an Exemption Review per Section V OR perform a 50.59 Evaluation per Section VI.
3. Does the proposed activity potentially impact equipment, procedures, or facilities utilized for storing spent fuel at an Independent Spent Fuel Storage Installation? ☐ Yes
☐ No
☒ N/A
(Check "N/A" if dry fuel storage is not applicable to the facility.)
If "yes," perform a 72.48 Review in accordance with NMM Procedure LI-112.
(See Sections 1.5 and 5.3.1.5 of the EOI 10CFR50.59 Review Program Guidelines.)

¹ If "YES," see Section 5.1.4. No LBD change is required.

² If "YES," notify the responsible department and ensure a 50.54 Evaluation is performed. Attach the 50.54 Evaluation.

³ If "YES," evaluate the change in accordance with the requirements of the facility's Operating License Condition.

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III. ENVIRONMENTAL SCREENING

If any of the following questions is answered "yes," an Environmental Review must be performed in accordance with NMM Procedure EV-115, "Environmental Evaluations," and attached to this 50.59 Review. Consider both routine and non-routine (emergency) discharges when answering these questions.

Will the proposed Change being evaluated:

Yes No

1. ☐ ☒ Involve a land disturbance of previously disturbed land areas in excess of one acre (i.e., grading activities, construction of buildings, excavations, reforestation, creation or removal of ponds)?
2. ☐ ☒ Involve a land disturbance of undisturbed land areas (i.e., grading activities, construction, excavations, reforestation, creating, or removing ponds)?
3. ☐ ☒ Involve dredging activities in a lake, river, pond, or stream?
4. ☐ ☒ Increase the amount of thermal heat being discharged to the river or lake?
5. ☐ ☒ Increase the concentration or quantity of chemicals being discharged to the river, lake, or air?
6. ☐ ☒ Discharge any chemicals new or different from that previously discharged?
7. ☐ ☒ Change the design or operation of the intake or discharge structures?
8. ☐ ☒ Modify the design or operation of the cooling tower that will change water or air flow characteristics?
9. ☐ ☒ Modify the design or operation of the plant that will change the path of an existing water discharge or that will result in a new water discharge?
10. ☐ ☒ Modify existing stationary fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)?¹
11. ☐ ☒ Involve the installation of stationary fuel burning equipment or use of portable fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)?¹
12. ☐ ☒ Involve the installation or use of equipment that will result in an air emission discharge?
13. ☐ ☒ Involve the installation or modification of a stationary or mobile tank?
14. ☐ ☒ Involve the use or storage of oils or chemicals that could be directly released into the environment?
15. ☐ ☒ Involve burial or placement of any solid wastes in the site area that may affect runoff, surface water, or groundwater?

¹ See NMM Procedure EV-117, "Air Emissions Management Program," for guidance in answering this question.

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IV. SECURITY PLAN SCREENING

If any of the following questions is answered "yes," a Security Plan review must be performed by the Security Department to determine actual impact to the Plan and the need for a change to the Plan.

A. Could the proposed activity being evaluated:

Yes No

1. ☐ ☒ Add, delete, modify, or otherwise affect Security department responsibilities (e.g., including fire brigade, fire watch, and confined space rescue operations)?
2. ☐ ☒ Result in a breach to any security barrier(s) (e.g., HVAC ductwork, fences, doors, walls, ceilings, floors, penetrations, and ballistic barriers)?
3. ☐ ☒ Cause materials or equipment to be placed or installed within the Security Isolation Zone?
4. ☐ ☒ Affect security lighting by adding or deleting lights, structures, buildings, or temporary facilities?
5. ☐ ☒ Modify or otherwise affect the intrusion detection systems (e.g., E-fields, microwave, fiber optics)?
6. ☐ ☒ Modify or otherwise affect the operation or field of view of the security cameras?
7. ☐ ☒ Modify or otherwise affect (block, move, or alter) installed access control equipment, intrusion detection equipment, or other security equipment?
8. ☐ ☒ Modify or otherwise affect primary or secondary power supplies to access control equipment, intrusion detection equipment, other security equipment, or to the Central Alarm Station or the Secondary Alarm Station?
9. ☐ ☒ Modify or otherwise affect the facility's security-related signage or land vehicle barriers, including access roadways?
10. ☐ ☒ Modify or otherwise affect the facility's telephone or security radio systems?

The Security Department answers the following questions if one of the questions was answered "yes".

B. Is the Security Plan actually impacted by the proposed activity? ☐ Yes
☐ No

C. Is a change to the Security Plan required? ☐ Yes Change # (optional) _____
☐ No

Name of Security Plan reviewer (print) / Signature / Date

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B. Basis

Provide a clear, concise basis for the answers given in the applicable sections above. Explain why the proposed activity does or does not impact the Operating License/Technical Specifications and/or the FSAR and why the proposed activity does or does not involve a new test or experiment not previously described in the FSAR. Adequate basis must be provided within the Screening such that a third-party reviewer can reach the same conclusions. Simply stating that the change does not affect TS or the FSAR is not an acceptable basis. See EOI 50.59 Guidelines Section 5.6.6 for guidance.)

Performed a search of the online Operating License, Techspecs, NRC Orders, FSAR, TRM, COLR, SERs, QAPM, Emergency Plan, Fire Protection Program, and ODCM for the keywords "plume", "engineering units", and "air sample". Reviewed all hits returned.

Relevant hits were returned in UFSAR Table 12.5-1 and lists the Range of air samplers in English engineering units (0-2.5 SCFM). Section 12.5.2.2.1 describes Table 12.5-1 as "examples" of instruments. Licensing evaluated the section and table and determined that the listing of "examples" does not restrict the engineering units that measurements are limited to provided that the specified range of Table 12.5-1 is met. Air samplers at GGNS provide a range that exceeds the Table 12.5-1 requirement, although measured in metric engineering units. The UFSAR uses both engineering unit systems in various places and the air sampler calibrated range is equivalent to or exceeds the UFSAR requirement.

No other hits relevant to this change were noted. This change does not represent a change to any LBD or system, structure or component described in the LBDs.

C. References

Discuss the methodology for performing the LBD search. State the location of relevant licensing document information and explain the scope of the review such as electronic search criteria used (e.g., key words) or the general extent of manual searches per Section 5.3.6.4 of LI-101. **NOTE: Ensure that electronic and manual searches are performed using controlled copies of documents. If you have any questions, contact your site Licensing department.**

LBDs/Documents reviewed via keyword search:

Keywords:

Operating License, Techspecs, NRC Orders, FSAR, TRM, COLR, SERs, QAPM, Emergency Plan, Fire Protection Program, and ODCM

plume, engineering unit, air sample

LBDs/Documents reviewed manually:

UFSAR Table 12.5-1, UFSAR Section 12.5.2 and 12.5.3, Emergency Plan Section 7.6.4

- D. Is the validity of this Review dependent on any other change?** (See Section 5.3.4 of the EOI 10CFR50.59 Program Review Guidelines)

☐ Yes
☒ No

If "Yes," list the required changes.

N/A

Title: Emergency Radiological Monitoring	No.: 10-S-01-14	Revision: 22	Emergency Plan Evaluation
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1. DOCUMENT INFORMATION

Procedure/Document Number: 10-S-01-14	Proc./Doc. Revision: 22
Document Title: Emergency Radiological Monitoring	
Brief Description of Proposed Revision:	
<ul style="list-style-type: none">• Adds commitment to GNRI-03/00066 Section 4.3 as required by WT-GGN-2003-0000 CA 496 to implement License Amendment 158.• Changes cubic feet and CFM to liters and LPM. All ENS air sampling instruments are now calibrated in liters (EPATS 1580).• Adds instructions for determination of Plume Characterization (Section 6.3)(EPATS 1376).• Updates references.	

2. SCREENING

A.) Does the proposed revision require a change to the Emergency Plan, change a commitment in the E-plan, or potentially decrease the effectiveness of the E-plan?
___ Yes x No

B.) Does the proposed revision change the site Emergency Action Levels (EALs)?
___ Yes x No

If the answer to either question is YES, then a 10CFR50.54(q) evaluation must be performed. See attachment 9.2. If the answer is NO provide justification below.

3. Justification for "NO" Answers

Section 7.6.4 of the Emergency Plan describes the air sampling requirements in an accident situation. The Emergency plan in 7.6.4.4.b specify that this procedure prescribes the techniques to be used for determining radioiodine concentrations. The requirements of the Emergency Plan are not specified to the detail outlined in this procedure.

The techniques and requirements of this procedure are not described in the EALs and the changes do not change the EALs.

The changes are not described in the Emergency Plan and do not conflict with the requirements of the Emergency Plan, therefore the effectiveness of the Emergency Plan is not decreased.

4. APPROVAL

Screening Prepared By: <u>Richard Sumrell</u>	<u>1/20/04</u>
Signature	Date
Screening Reviewed By: <u>[Signature]</u>	<u>1-26-04</u>
Signature	Date
Screening Approved By: <u>[Signature]</u>	<u>2-2-04</u>
Signature	Date

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RPTS FORM

10CFR50.59 Review Required?	(X) Yes	If Yes, attach 50.59 Review Form
	() No	Not required per LI-101

Cross-Discipline review required?	(X) Yes	(Note affected Departments Below)
	() No	
Preparer Initials>>>	RS <i>RS</i>	

Department Cross-Discipline Reviews Needed	Signoff (signed, electronic, telcon)
Offsite Monitoring Team Lead	<i>Michael J. Lajoie</i>

Does this directive contain Tech Spec Triggers? () YES (X) NO

REQUIREMENTS CROSS-REFERENCE LIST

Requirement Implemented	by Directive	Directive Paragraph Number
Name	Paragraph Number	That Implements Requirement
GGNS Emer Plan	7.6.3.S1	6.1.4
GGNS Emer Plan	7.6.4.S4.a,b,& c	*
GNRI-03/00066	Section 4.3	6.4

* Covered by directive as a whole or by various paragraphs of the directive.

NOTE

The Component Database Change Request statement is applicable only to Volume 06 and 07 maintenance directives.

Component Database Change Request generated and the backup documentation available for setpoint and/or calibration data only ☐ Yes ☒ N/A CDBCR # _____**Current Revision Statement**

Revision 22:

- Adds commitment to GNRI-03/00066 Section 4.3 as required by WT-GGN-2003-0000 CA 496 to implement License Amendment 158.
- Changes cubic feet and CFM to liters and LPM. All ENS air sampling instruments are now calibrated in liters (EPATS 1580).
- Adds instructions for determination of Plume Characterization (Section 6.3) (EPATS 1376).
- Updates references.

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1.0 PURPOSE AND DISCUSSION

1.1 Purpose

- 1.1.1 To provide guidance for onsite and offsite emergency radiological surveys.

1.2 Discussion

- 1.2.1 Radiological surveys are performed during an emergency for the following purposes:
- Support Emergency Response Teams
 - Evaluate and verify onsite and offsite radiological conditions

2.0 RESPONSIBILITIES

- 2.1 Radiation Protection Manager - Ensures implementation of this procedure upon notification by the Emergency Director.
- 2.2 On-Shift Health Physicist - Is responsible for ensuring that required onsite radiological surveys are performed before Operations Support Center activation.
- 2.3 Health Physics Coordinator - Is responsible for ensuring that onsite radiological surveys are performed upon activation of the OSC.
- 2.4 EOF Plume Tracker - Is responsible for forming and dispatching the Offsite Radiological Monitoring Teams and giving specific guidance as needed. (The HP Coordinator assumes this responsibility if the EOF is not operational.)
- 2.5 Offsite Monitoring Team Monitor - Is responsible for performing radiological monitoring, outside of the protected area, in accordance with this procedure.
- 2.6 Radiation Emergency Manager - Assumes the responsibility for offsite environmental sampling and radiological assessment monitoring once the Emergency Operations Facility is operational.

3.0 REFERENCES

- 3.1 GGNS Emergency Plan
- 3.2 Administrative Procedure 01-S-08-2, Exposure and Contamination Control
- 3.3 Radiation Protection Procedure 08-S-02-50, Radiological Surveys and Surveillances
- 3.4 Emergency Plan Procedure 10-S-01-17, Emergency Personnel Exposure Control
- 3.5 Nuclear Management Manual RP-302, Operation of Radiation Protection Instrumentation

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4.0 ATTACHMENTS

4.1 None

5.0 DEFINITIONS

- 5.1 Downwind - An area located beyond a fixed point in the same direction the wind is blowing. The area usually covers three sectors; one sector on either side of the sector containing the projected plume centerline. (When plume centerline is on a sector line, four sectors are to be used until the three sector criteria can be identified.)

NOTE

- Atmospheric and geographical conditions may cause the plume width to vary from one, to six sectors.
- Variations in plume concentration and predicted location are more likely to occur as distance from the point of release increases.

- 5.2 Offsite - As used for plume tracking purposes, all areas beyond the site boundary.
- 5.3 Emergency Dosimetry - TLD and High and Accident range dosimeters, or TLD and EAD.
- 5.4 RPM - Radiation Protection Manager
- 5.5 REM - Radiation Emergency Manager
- 5.6 EOF - Emergency Operations Facility
- 5.7 OMT - Offsite Monitoring Team
- 5.8 OMK - Offsite Monitoring Kit
- 5.9 OSC - Operations Support Center
- 5.10 TLD - Thermoluminescent Dosimetry
- 5.11 High Range Dosimeter - $> 1R$ but $< 100R$
- 5.12 Accident Range Dosimeter - $\geq 100R$
- 5.13 Onsite - For the purposes of this procedure, onsite is considered to be all areas external to the power block and within the site boundary.
- 5.14 TSC - Technical Support Center
- 5.15 ALARA - As Low As Reasonably Achievable
- 5.16 EAD - Electronic Alarming Dosimeter
- 5.17 Sample Containers - Are containers such as Ziploc bags, water sample bottles, plastic bags or other devices used to collect samples such as smears, air samples, water, vegetation, and dirt.

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6.0 DETAILS

NOTE

- All surveys, samples, analysis, and radiological access control will be performed IAW GGNS Radiation Control procedures. The following exceptions are in effect during a declared emergency:
 - ⇒ Beta dose rate surveys may be performed using GM tube instruments
 - ⇒ Count rate meters may be used in areas in which the background exceeds 300 CPM.
 - ⇒ Air sample volumes other than 900 liters may be used for quantitative analysis. Air samples volumes of at least 300 liters are preferred.
- All personnel will exercise ALARA at all times. All samples must be handled in a manner that minimizes personnel radiation exposure
- Radiological monitoring teams must maintain radio contact with the EOF/OSC (as appropriate). If radio communication is unavailable, contact should be made via telephone.
- Offsite location can be determined using the sector signs that are placed in the 5 mile EPZ, together with the OMT map, as follows:

BC
1.5

On the sector line
at 1.5 miles from GGNS

B
1.5

Inside the sector
1.5 miles from GGNS

6.1 Survey Documentation/Sample Handling and Labeling

- 6.1.1 All samples must be handled in an ALARA manner and must be:
 - a. Placed in a sample container.
 - b. Tagged as radioactive (if appropriate).
 - c. In the custody of, or controlled by, a person trained to handle the samples.
- 6.1.2 All sample containers should be labeled or marked with the following sample information:
 - DATE: Start/Stop (as applicable)
 - TIME: Start/Stop (as applicable)
 - LOCATION OF SAMPLE
 - SAMPLER #(as applicable)
- 6.1.3 Record survey or sample information on the Radiological Monitoring Log(EPP 14-01) and report data to the EOF/OSC as appropriate.

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6.1.4 All samples should normally be returned to the EOF/OSC for later analysis if required. The GGNS Chemistry Department has isotopic analysis capability available for onsite and offsite samples. In addition, the Department of Energy and/or the Mississippi State Department of Health mobile laboratories may be used to assist in the analysis of environmental samples. Assistance from these facilities or others may be used at the discretion of the Radiation Emergency Manager.

6.2 Plume Dose Rate Surveys (Immersion dose and Cloud Shine dose)

- 6.2.1 Obtain survey instrument appropriate for the radiological conditions expected (normally a beta-gamma capable dose rate meter).
- 6.2.2 Verify that it is zeroed and has a current calibration sticker.
- 6.2.3 Perform response check of instrument with a radioactive source.
- 6.2.4 Set instrument on the LOWEST scale and traverse the area to be surveyed.
- 6.2.5 Record the highest closed-window gamma reading found on the Radiological Monitoring Log (EPP 14-01).
- 6.2.6 Report data (in mR/hr) to EOF Plume Tracker, OSC HP Coordinator, as appropriate.

6.3 Plume Characterization

- 6.3.1 If requested, characterize plume location as outlined in Plume Characterization Flowchart (EPP 14-05).
- 6.3.2 Report results to EOF Plume Tracker, OSC HP Coordinator, as appropriate.

6.4 Airborne Radioactivity Surveys (Immersion dose and Thyroid dose)

- 6.4.1 Obtain Hi-Vol air sampler.
- 6.4.2 Verify that it has a current calibration sticker.
- 6.4.3 Install a iodine sample cartridge and a particulate filter into the Hi-Vol sample head. Place tape over the filter paper (particulate side) of the head.
- 6.4.4 Insert Hi-Vol head onto the air sampler until the rubber o-ring on the head is seated onto the air sampler.
- 6.4.5 Place Air Sampler on a platform; i.e., white bucket, and place at desired sample location.
- 6.4.6 Set the timer for the appropriate time (in minutes).
- 6.4.7 Remove tape, then turn on the air sampler.
- 6.4.8 Ensure that the flow rate does not exceed 60 LPM.

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- 6.4.9 Count the air sample filter paper and cartridge using a count-rate meter and record the data on the Radiological Monitoring Log (EPP 14-01). When counting the air sample filter paper and cartridge, ensure they are counted separately from each other.
- 6.4.10 Report the data (in net cpm(cpm - bkgd cpm)) as appropriate.
- 6.4.11 To determine radioiodine concentration from the air sample, use the equation on the Radiological Monitoring Log (EPP 14-01).
- 6.5 Contamination Smear Surveys (Deposition)
 - 6.5.1 Take 16" "S" smears of the surface to be surveyed.
 - 6.5.2 Obtain a count rate meter and verify that it has a current calibration sticker.
 - 6.5.3 Hold the probe for the count rate meter approximately $\frac{1}{4}$ - $\frac{1}{2}$ inch above the smear to obtain total counts.
- 6.6 Vegetation Sampling (Plume Depletion/Deposition)
 - 6.6.1 Collect small pieces of leafy vegetation from the area to be sampled. Grass clippers are provided in the OMK for this purpose.
 - 6.6.2 Place the pieces in a poly bag and obtain a contact dose rate or count rate of the sample (through the bag).
 - 6.6.3 Hold the probe for the count rate meter $\frac{1}{4}$ - $\frac{1}{2}$ inch above the bag to obtain total counts.
- 6.7 Liquid Sample Collection
 - 6.7.1 Determine the liquid water source to be sampled. Liquid collection containers are provided in the OMK for sampling.
 - 6.7.2 If the sample is from a natural source, submerge the container and fill it to the neck. Place the top on the container, wipe the container off and seal it with duct tape.
 - 6.7.3 If the sample is not from a natural source, try to obtain the sample from the point of entry into the environment. Fill the container to the neck. Place the top on the container and seal it with duct tape.
 - 6.7.4 Hold the probe for the count rate meter $\frac{1}{4}$ - $\frac{1}{2}$ inch above the container to obtain total counts.
- 6.8 Soil Sample Collection
 - 6.8.1 Collect approximately 1 liter of soil and place in an appropriate container.
- 6.9 Reports and Records
 - 6.9.1 Forms and paperwork generated by this procedure during emergencies must be submitted to the Manager, Emergency Preparedness to be filed as a Quality Assurance Record.

PLANT OPERATIONS MANUAL

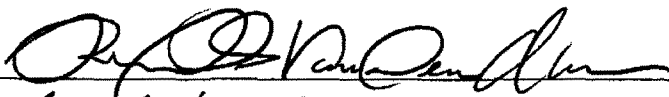
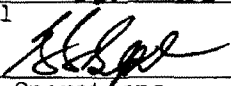
Volume 10
Section 01

10-S-01-33
Revision: 12
Date: 2/10/04

EMERGENCY PLAN PROCEDURE

EMERGENCY OPERATIONS FACILITY (EOF) OPERATION

SAFETY RELATED

Prepared: 
Reviewed: Richard Sumrell
Technical
Concurred: 
Manager, Operations
OSRC: M. A. Krupa
Approved: J. Brad Edwards M. A. Krupa
Plant General Manager Manager, Emergency Preparedness

List of Effective Pages:

Pages 1-19

Attachments I - II

List of TCNs Incorporated:

<u>Revision</u>	<u>TCN</u>
0	None
1	1
2	None
3	2
4	None
5	3
6	None
7	4
8	None
9	None
10	None
11	None
12	None

Title: Emergency Operations Facility (EOF) Operations	No.: 10-S-01-33	Revision: 12	Safety Evaluation
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I. OVERVIEW/SIGNATURES

Facility: GGNSDocument Reviewed: 10-S-01-33 Change/Rev. 12

System

Designator(s)/Description: _____

Description of Proposed Change

Revision 12:


- Clarifies EOF activation requirements.
- Clarifies Fitness For Duty requirements for EOF access.
- Removes attachment I, BEOF diagram, which is already in EPP 33-14.

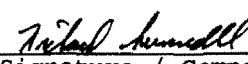
If the proposed activity, in its entirety, involves any one of the criteria below, check the appropriate box, provide a justification/basis in the Description above, and forward to a Reviewer. No further 50.59 Review is required. If none of the criteria is applicable, continue with the 50.59 Review.

- ☐ The proposed activity is editorial/typographical as defined in Section 5.2.2.1.
- ☐ The proposed activity represents an "FSAR-only" change as allowed in Section 5.2.2.2 _____. (Insert item # from Section 5.2.2.2).

If further 50.59 Review is required, check the applicable review(s): (Only the sections indicated must be included in the Review.)

<input checked="" type="checkbox"/> SCREENING	Sections I, II, III, and IV required
<input type="checkbox"/> 50.59 EVALUATION EXEMPTION	Sections I, II, III, IV, and V required
<input type="checkbox"/> 50.59 EVALUATION (#: _____)	Sections I, II, III, IV, and VI required

Preparer: Richard Van Den Akker /  /EOI/NSA-EP/ 10-23-03
Name (print) / Signature / Company / Department / Date

Reviewer: Richard Sumrell /  /EOI-EP 1/8/04
Name (print) / Signature / Company / Department / Date

OSRC: NA
Chairman's Name (print) / Signature / Date
[Required only for Programmatic Exclusion Screenings (see Section 5.8) and 50.59 Evaluations.]

List of Assisting/Contributing Personnel:

Name:

Scope of Assistance:

NANA

Title: Emergency Operations Facility (EOF) Operations	No.: 10-S-01-33	Revision: 12	Safety Evaluation
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II. SCREENING

A. Licensing Basis Document Review

1. Does the proposed activity impact the facility or a procedure as described in any of the following Licensing Basis Documents?

<i>Operating License</i>	YES	NO	<i>CHANGE # and/or SECTIONS IMPACTED</i>
Operating License	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Orders	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", obtain NRC approval prior to implementing the change by initiating an LBD change in accordance with NMM LI-113 (Reference 2.2.13). (See Section 5.1.13 for exceptions.)			

<i>LBDs controlled under 50.59</i>	YES	NO	<i>CHANGE # (if applicable) and/or SECTIONS IMPACTED</i>
FSAR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
TS Bases	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Technical Requirements Manual	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Core Operating Limits Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
NRC Safety Evaluation Reports ¹	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", perform an Exemption Review per Section V <u>OR</u> perform a 50.59 Evaluation per Section VI <u>AND</u> initiate an LBD change in accordance with NMM LI-113 (Reference 2.2.13).			

<i>LBDs controlled under other regulations</i>	YES	NO	<i>CHANGE # (if applicable) and/or SECTIONS IMPACTED</i>
Quality Assurance Program Manual ²	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Emergency Plan ²	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Fire Protection Program ³ (includes the Fire Hazards Analysis)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Offsite Dose Calculations Manual	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", evaluate any changes in accordance with the appropriate regulation <u>AND</u> initiate an LBD change in accordance with NMM LI-113 (Reference 2.2.13).			

2. Does the proposed activity involve a test or experiment not described in the FSAR? ☐ Yes ☒ No

If "yes," perform an Exemption Review per Section V OR perform a 50.59 Evaluation per Section VI.

3. Does the proposed activity potentially impact equipment, procedures, or facilities utilized for storing spent fuel at an Independent Spent Fuel Storage Installation? ☐ Yes ☐ No ☒ N/A

(Check "N/A" if dry fuel storage is not applicable to the facility.)
If "yes," perform a 72.48 Review in accordance with NMM Procedure LI-112.
(See Sections 1.5 and 5.3.1.5 of the EOI 10CFR50.59 Review Program Guidelines.)

¹ If "YES," see Section 5.1.4.

² If "YES," notify the responsible department and ensure a 50.54 Evaluation is performed. Attach the 50.54 Evaluation.

³ If "YES," evaluate the change in accordance with the requirements of the facility's Operating License Condition.

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B. Basis

Performed an on-line search of the GGNS Emergency Plan, Tech Specs, COLR, UFSAR, TRM, Operating License, NRC Orders, ODCM, Fire Protection Program and SER's for the keywords: "notification", "operational hotline", "Back-up Emergency Operations Facility", "BEOF", "Fitness for duty", "FFD". No relevant hits were identified.

The GGNS Technical Specifications and their bases do not discuss or refer to any activities associated with activating emergency response facilities, ensuring fitness for duty of Emergency Response Organization personnel, or the location and arrangement of the Back-up Emergency Operations Facility.

The changes to the Fitness For Duty portions of this instruction are consistent with Nuclear Management Manual procedure NS-102. These changes clarify response to a positive alcohol breathalyzer test.

This procedure does not include any tests or experiments that are not described in the SAR, and all tests described herein are consistent with the normal operation of the equipment.

This change does not involve any activities that will affect the environment.

C. References

Discuss the methodology for performing the LBD search. State the location of relevant licensing document information and explain the scope of the review such as electronic search criteria used (e.g., key words) or the general extent of manual searches per Section 5.3.6.4 of LI-101. **NOTE: Ensure that electronic and manual searches are performed using controlled copies of documents. If you have any questions, contact your site Licensing department.**

LBDs/Documents reviewed via keyword search:

Emergency Plan, Tech Specs, COLR, UFSAR, TRM, Operating License, NRC Orders, ODCM, Fire Protection Program and SER's

Keywords:

Operational hotline, notification, Back-up emergency Operations Facility, BEOF, fitness for duty and FFD.

LBDs/Documents reviewed manually:

GGNS Emergency Plan sections 7.3.4 (BEOF) and 7.3.5 (OHL)

- D. Is the validity of this Review dependent on any other change? (See Section 5.3.4 of the EOI 10CFR50.59 Program Review Guidelines.) ☐ Yes ☒ No
If "Yes," list the required changes.

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III. ENVIRONMENTAL SCREENING

If any of the following questions is answered "yes," an Environmental Review must be performed in accordance with NMM Procedure EV-115, "Environmental Evaluations," and attached to this 50.59 Review. Consider both routine and non-routine (emergency) discharges when answering these questions.

Will the proposed Change being evaluated:

Yes No

1. ☐ ☒ Involve a land disturbance of previously disturbed land areas in excess of one acre (i.e., grading activities, construction of buildings, excavations, reforestation, creation or removal of ponds)?
2. ☐ ☒ Involve a land disturbance of undisturbed land areas (i.e., grading activities, construction, excavations, reforestation, creating, or removing ponds)?
3. ☐ ☒ Involve dredging activities in a lake, river, pond, or stream?
4. ☐ ☒ Increase the amount of thermal heat being discharged to the river or lake?
5. ☐ ☒ Increase the concentration or quantity of chemicals being discharged to the river, lake, or air?
6. ☐ ☒ Discharge any chemicals new or different from that previously discharged?
7. ☐ ☒ Change the design or operation of the intake or discharge structures?
8. ☐ ☒ Modify the design or operation of the cooling tower that will change water or air flow characteristics?
9. ☐ ☒ Modify the design or operation of the plant that will change the path of an existing water discharge or that will result in a new water discharge?
10. ☐ ☒ Modify existing stationary fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)?¹
11. ☐ ☒ Involve the installation of stationary fuel burning equipment or use of portable fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)?¹
12. ☐ ☒ Involve the installation or use of equipment that will result in an air emission discharge?
13. ☐ ☒ Involve the installation or modification of a stationary or mobile tank?
14. ☐ ☒ Involve the use or storage of oils or chemicals that could be directly released into the environment?
15. ☐ ☒ Involve burial or placement of any solid wastes in the site area that may affect runoff, surface water, or groundwater?

¹ See NMM Procedure EV-117, "Air Emissions Management Program," for guidance in answering this question.

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IV. SECURITY PLAN SCREENING

If any of the following questions is answered "yes," a Security Plan review must be performed by the Security Department to determine actual impact to the Plan and the need for a change to the Plan.

A. Could the proposed activity being evaluated:

Yes No

1. ☐ ☒ Add, delete, modify, or otherwise affect Security department responsibilities (e.g., including fire brigade, fire watch, and confined space rescue operations)?
2. ☐ ☒ Result in a breach to any security barrier(s) (e.g., HVAC ductwork, fences, doors, walls, ceilings, floors, penetrations, and ballistic barriers)?
3. ☐ ☒ Cause materials or equipment to be placed or installed within the Security Isolation Zone?
4. ☐ ☒ Affect security lighting by adding or deleting lights, structures, buildings, or temporary facilities?
5. ☐ ☒ Modify or otherwise affect the intrusion detection systems (e.g., E-fields, microwave, fiber optics)?
6. ☐ ☒ Modify or otherwise affect the operation or field of view of the security cameras?
7. ☐ ☒ Modify or otherwise affect (block, move, or alter) installed access control equipment, intrusion detection equipment, or other security equipment?
8. ☐ ☒ Modify or otherwise affect primary or secondary power supplies to access control equipment, intrusion detection equipment, other security equipment, or to the Central Alarm Station or the Secondary Alarm Station?
9. ☐ ☒ Modify or otherwise affect the facility's security-related signage or land vehicle barriers, including access roadways?
10. ☐ ☒ Modify or otherwise affect the facility's telephone or security radio systems?

The Security Department answers the following questions if one of the questions was answered "yes".

B. Is the Security Plan actually impacted by the proposed activity?

☐ Yes

☐ No


C. Is a change to the Security Plan required?

☐ Yes Change # (optional) _____

☐ No

N/A

Name of Security Plan reviewer (print) / Signature / Date

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ATTACHMENT 9.1
10CFR50.54(q) SCREENING
1. DOCUMENT INFORMATION

Procedure/Document Number: 10-S-01-33	Proc./Doc. Revision: Rev 12
Document Title: Emergency Operation Facility (EOF) Operation	
Brief Description of Proposed Revision:	
10-S-01-33 "Emergency Operations Facility (EOF) Operations" is being revised to : <ul style="list-style-type: none"> • Clarify EOF activation requirements. • Clarify fitness for duty requirements. • Remove Attachment I, BEOF diagram, which is already in EPP 33-14. 	


2. SCREENING


A.) Does the proposed revision require a change to the Emergency Plan, change a commitment in the E-plan, or potentially decrease the effectiveness of the E-plan? ___ Yes <input checked="" type="checkbox"/> No
B.) Does the proposed revision change the site Emergency Action Levels (EALs)? ___ Yes <input checked="" type="checkbox"/> No
If the answer to either question is YES, then a 10CFR50.54(q) evaluation must be performed. See attachment 9.2. If the answer is NO provide justification below.


3. Justification for "NO" Answers

10-S-01-33 does not address EAL's and the changes to this procedure will have no affect on the EALS.
The Emergency Plan does not detail what equipment in the EOF must be operable to activate the facility or address the details of meeting FFD requirements in the EOF.
The Emergency Plan does contain a diagram of the BEOF, but the diagram is not required to be in the procedure.

4. APPROVAL

Screening Prepared By:  12-3-03
 Signature Date


Screening Reviewed By:  1/8/04
 Signature Date

Screening Approved By:  1/14/04
 Signature Date

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RPTS FORM

10CFR50.59 Review Required?	<input checked="" type="checkbox"/> Yes	If Yes, attach 50.59 Review Form
	<input type="checkbox"/> No	Not required per LI-101

Cross-Discipline review required?	<input checked="" type="checkbox"/> Yes	(Note affected Departments Below)
	<input type="checkbox"/> No	
Preparer Initials>>> 		

Department Cross-Discipline Reviews Needed	Signoff (signed, electronic, telcon)
EOF Admin. director	<i>For: Cairns per telecon 1-12-04</i>

Does this directive contain Tech Spec Triggers? ☐ YES ☒ NO**REQUIREMENTS CROSS-REFERENCE LIST**

Requirement Implemented Name	by Directive Paragraph Number	Directive Paragraph Number That Implements Requirement
GGNS Emergency Plan	7.3.3.S9, S10	6.2.1
	7.3.3.S11 & S12	6.2.1
CR 98-1411	CA #9	Note (2.0)
		Note (2.2.1)
NS-102	5.12.6.3, 4	6.2.6.c

* Covered by directive as a whole or by various paragraphs of the directive.

NOTE

The Component Database Change Request statement is applicable only to Volume 06 and 07 maintenance directives.

Component Database Change Request generated and the backup documentation available for setpoint and/or calibration data only ☐ Yes ☒ N/A CDBCR # _____**Current Revision Statement**

Revision 12:

- Clarifies EOF activation requirements.
- Clarifies Fitness For Duty requirements for EOF access.
- Removes Attachment I, BEOF diagram, which is already in EPP 33-14.

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1.0 PURPOSE AND DISCUSSION

1.1 Purpose

- 1.1.1 To provide instructions for the activation and operation of the Emergency Operations Facility (EOF) and Backup Emergency Operations Facility (BEOF), in support of the Grand Gulf Nuclear Station Emergency Plan.

2.0 RESPONSIBILITIES

NOTE

The OEC must turnover responsibilities to a qualified individual before leaving the EOF when he/she has responsibility for Emergency Direction and Control (i.e., the OEC must be available immediately to make Protective Action Recommendations (PARS) and make decisions relating to notification of offsite authorities).

2.1 Offsite Emergency Coordinator (OEC)

- 2.1.1 The OEC is the Site Vice President or alternate. The OEC is responsible for:
- The overall emergency response effort.
 - Classifying the emergency in accordance with reference 3.4
 - Providing needed plant support (local, state, and federal) via the emergency organization.
 - Providing guidance to the Emergency Director as appropriate.
 - Assuring continuity of technical, administrative, and material resources throughout the emergency.
 - Management level interface with governmental authorities.
 - Making Protective Action Recommendations (PARs) to state and local agencies after the EOF is operational and has assumed this responsibility from the TSC or Control Room.
 - Initiating the recovery phase of the emergency in accordance with reference 3.2.
 - Authorizing the use of KI (if necessary) in accordance with reference 3.1.

NOTE

Emergency Response personnel who must leave their assigned location temporarily must inform their immediate superior of their locations, destination and estimated time of return (with the exception of the OEC).

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2.2 Radiation Emergency Manager (REM)

2.2.1 The REM reports directly to the OEC. The REM is responsible for:

- a. Arranging offsite environmental and radiological support.
- b. Briefing incoming environmental and radiological support personnel and helping them provide assistance to the emergency effort.
- c. Supervision and direction of radiological assessment personnel in the EOF.
- d. Dose projection, dose assessment, field monitoring activities and EOF radiological surveys.
- e. Coordinating dose projection, dose assessment and field monitoring activities with state efforts.
- f. Developing Protective Action Recommendations (PARs).
- g. Informing State Radiological Assessment Officers (SRAOs) of radiological status and PARs.
- h. Consulting with RPM on plant, radiological, and meteorological data and PARs.
- i. Ensuring that radiological assessment area is operational.
- j. Advising OEC when ready to perform radiological monitoring and assessment and develop PARs.
- k. Verifying EOF habitability. Announce habitability results to EOF.
- l. Advising State Radiological Assessment Officers (SRAO) and RPM when EOF is operational.
- m. Consulting with RPM on plant status and corrective actions.
- n. Briefing radiological assessment staff.
- o. Briefing state/local representatives and providing 10CFR19 briefing as appropriate.
- p. Reviewing radiological EALs for correct classification.
- q. Checking radiological data for SRAO trigger points.
- r. Reviewing dose calculation data.
- s. Advising OEC if EOF habitability is threatened.
- t. Advising OEC of significant met/rad change.
- u. Reviewing Emergency Notification Forms.
- v. Assigning qualified individuals to perform decontamination, if required.

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2.2.1 (Continued)

- w. Contacting SRAOs within 30 minutes to ensure they understand any PARs issued.
- x. Posting PAR implementation status on radiological status board when advised by OEC.

2.3 Emergency Support Manager Responsibilities

2.3.1 The Emergency Support Manager reports to the EOF Administrative Director. The Emergency Support Manager is responsible for procuring emergency equipment, supplies and services for GGNS during a declared emergency.

2.4 Radiological Assessment Coordinator (RAC)

2.4.1 The RAC reports to the REM and is responsible for:

- a. Technical direction of the radiological assessment effort, including dose calculations, radiological monitoring and environmental sampling.
- b. Assist the REM in developing PARs.
- c. Ensuring the Health Physics Network (HPN) phone is manned when requested by the NRC.
- d. Verifying that radiological equipment is functional.
- e. Checking with REM on event status, meteorological, and radiological conditions.
- f. Reviewing EOF habitability survey results.
- g. Noting time for next Emergency Notification Form.
- h. Ensuring the Radiological Status Board is properly updated.
- i. Briefing REM on current dose projections.
- j. Consulting with the Plume Tracking Specialist on OMT dose margins.
- k. Preparing met/rad portion of Emergency Notification Form for REM approval.
- l. Reviewing incoming radiological data for SRAO trigger points.
- m. Obtaining current and forecast weather conditions.

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2.5 Radiological Assessment Dose Calculations (EOF)

2.5.1 The Radiological Assessment Dose Calculator (EOF) reports to the RAC and is responsible for the following:

- a. Verifying current dose projections from TSC.
- b. Performing dose calculations as data is received.
- c. Informing RAC of trends or significant changes in dose projections.

2.6 Plume Tracking Specialist (PTS)

2.6.1 The PTS reports to the RAC and is responsible for:

- a. Forming, dispatching and controlling Offsite Monitoring Teams (OMTs).
- b. Reporting data, received from the OMTs, to the Radiological Assessment Dose Calculator (EOF).
- c. Testing radio operability.
- d. Ensuring OMT members are issued emergency dosimetry and offsite monitoring equipment.
- e. Consulting with RAC to determine appropriate survey locations and potential radiological hazards to be encountered.
- f. Determining each OMT member's administrative exposure limit and their remaining dose margin in accordance with reference 3.5.
- g. Closely monitoring the team's exposure to airborne radioactive materials and contamination. Prescribing additional personnel protective measures as necessary.
- h. Briefing RAC on the status of the OMT member's accumulated exposure and any recommended protective measures.
- i. Advising OMTs of anticipated plume intensity.
- j. Rotating OMTs as necessary.

2.7 Offsite Monitoring Teams (OMTs)

2.7.1 The OMTs report to the PTS and are responsible for conducting offsite radiological monitoring and collecting environmental samples.

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2.8 EOF Habitability Specialist

2.8.1 The Habitability Specialist reports to the RAC and is responsible for:

- a. Conducting radiological monitoring in the EOF.
- b. Maintaining the EOF Radiological Status Board.
- c. Setting up frisking stations in the EOF.
- d. Advising REM/RAC of survey results.
- e. Issue KI when directed by REM.

2.8.2 The Habitability Specialist assumes the duties of the Health Physics Network Communicator when requested by the REM/RAC.

2.9 Technical/Engineering Support Manager

2.9.1 The Tech/Eng Support Manager reports to the OEC and is responsible for:

- a. Arranging offsite engineering support and briefing and assisting incoming engineers.
- b. Evaluating the status of the reactor core during an emergency.
- c. Reporting any plant status changes to the REM and OEC Technical Assistant.
- d. Periodically consulting with TSC on status of emergency and engineering/technical support requirements.
- e. Notifying additional technical/engineering personnel as necessary.
- f. Briefing support staff.
- g. Advising TSC on design criteria and core limitations as requested.
- h. Requesting fuel and core calculations as necessary.
- i. Ensuring plant status board is up-to-date.

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2.10 EOF Administrative Director

2.10.1 The EOF Admin. Director reports to the OEC and is responsible for:

- a. Initiating and completing each Emergency Notification Form.
- b. Ensuring that notifications are completed in required time.
- c. EOF communications and other administrative interfaces.
- d. Answering questions related to actions required by the Emergency Plan, implementing procedures or state/local Emergency Plans.
- e. Providing logistical support to offsite agencies and contractors.
- f. Assigning Lead Communicator.

2.11 EOF Communicator

2.11.1 The EOF Communicator reports to the EOF Admin. Director and is responsible for:

- a. Operation of the EOF communications system.
- b. Maintaining logs and records of all official communications in the EOF.
- c. Transmitting the Emergency Notification Form to state and local agencies via the OHL.
- d. Synchronizing EOF clocks with TSC.
- e. Requesting copies of all Emergency Notifications from TSC.
- f. Supplying copies of each notification to the OEC, REM, and Tech/Eng Support Manager.
- g. Initiating message log and retention file.
- h. Advising State, Local and Federal EOCs when EOF is operational.

2.12 OEC Technical Assistant (OECTA)

2.12.1 The OEC Tech Assist. reports to the OEC and is responsible for:

- a. Ensuring compliance with appropriate procedures and federal regulations.
- b. Checking EALs for proper event classification; reviewing Emergency Notification Forms; consulting with Tech/Engineering Support Manager on plant conditions and support needs; and consulting with plant licensing to ensure that proposed response options are in compliance with appropriate procedures and federal regulations.

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2.13 EOF Facility Coordinator

2.13.1 The EOF Facility Coordinator reports to the EOF Admin Director and is responsible for:

- a. Operating EOF systems and equipment, as directed.
- b. If electrical power fails, verify the Emergency Diesel Generator System operations.
- c. If directed to isolate EOF, checking fans and damper positions; checking filters for proper operations, securing boundary doors; and directing facility or equipment maintenance, as requested.

2.14 Food and Lodging Coordinator

2.14.1 The Food and Lodging Coordinator reports to the EOF Admin Director and is responsible for:

- a. Conducting breath analyses.
- b. Arranging food and lodging, as necessary.
- c. Access control for facility.

2.15 Minimum EOF Staffing

2.15.1 Individuals filling a "Minimum EOF Staffing" position are required to promptly sign in on the EOF status board when reporting to the EOF. "Minimum EOF Staffing" positions are normally contained within a red outlined box on the EOF status board. When the last position is filled to meet minimum staffing, the individual filling that position is responsible for informing the Offsite Emergency Coordinator that minimum staffing is met.

3.0 REFERENCES

- 3.1 Emergency Plan Procedure 10-S-01-20, Administration of Thyroid Blocking Agents
- 3.2 Emergency Plan Procedure 10-S-01-22, Recovery
- 3.3 Emergency Preparedness Procedure 10-S-02-3, Emergency Preparedness Form Control.
- 3.4 Emergency Plan Procedure 10-S-01-1, Activation of the Emergency Plan
- 3.5 Emergency Plan Procedure 10-S-01-17, Emergency Personnel Exposure Control
- 3.6 Emergency Plan Procedure 10-S-01-14, Emergency Radiological Monitoring
- 3.7 Emergency Plan Procedure 10-S-01-26, Offsite Emergency Response

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4.0 ATTACHMENTS

4.1 Attachment I - Map to Baxter Wilson Steam Electric Station

4.2 Attachment II - Manual Whole-Body Frisking Instructions

NOTE

Checklists are performance aids; they are intended to assist and aid ERO personnel in the performance of their tasks. Completion of checklists is not mandatory. These forms are stored in storage bins and the applicable forms for each position at the position's location.

5.0 DEFINITIONS

- 5.1 BEOF - Backup Emergency Operations Facility
- 5.2 ENMC - Emergency News Media Center
- 5.3 ENS - Emergency Notification System
- 5.4 EOC - Emergency Operations Center
- 5.5 EOF - Emergency Operations Facility
- 5.6 EPP - Emergency Plan Procedure
- 5.7 EPZ - Emergency Planning Zone
- 5.8 FEMA - Federal Emergency Management Agency
- 5.9 HPN - Health Physics Network
- 5.10 HVAC - Heating, Ventilation, and Air Conditioning
- 5.11 MDRH - Mississippi Department of Radiological Health
- 5.12 NRC - Nuclear Regulatory Commission
- 5.13 OMT - Offsite Monitoring Team
- 5.14 PAR - Protective Action Recommendation
- 5.15 PTS - Plume Tracking Specialist
- 5.16 RAC - Radiological Assessment Coordinator
- 5.17 REM - Radiation Emergency Manager
- 5.18 SRAO - State Radiological Assessment Officer
- 5.19 SRO - Senior Reactor Operator
- 5.20 OEC - Offsite Emergency Coordinator
- 5.21 ED - Emergency Director

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5.22 CEC - Corporate Emergency Center

5.23 EAL's - Emergency Action Levels

5.24 KI - Potassium Iodide

6.0 DETAILS

6.1 Personnel Duties

6.1.1 Personnel assigned to the EOF or BEOF should be knowledgeable of and comply with personnel access and Fitness for Duty requirements.

6.1.2 Personnel assigned to the EOF or BEOF should maintain logs of their activities.

- a. Log entries need not duplicate information contained in messages, status reports, etc., but should contain a chronological history of actions, decisions, and important communications which occur.

NOTE

The OEC may delegate log keeping responsibilities to the OEC Technical Assistant.

6.1.3 Personnel assigned to the EOF should sign in on the EOF Personnel Status Board upon arrival in the EOF.

- a. The EOF Admin Director ensures that the status board is completed.

6.2 Activation

6.2.1 The EOF may be activated at any time, and shall be activated at an Alert, Site Area Emergency, and General Emergency. Once activated, the EOF shall become operational as soon as possible (without delay). When facility staffing can be accomplished with onsite personnel, it is the goal to become operational within 45 minutes. Otherwise, when personnel staffing the facility are offsite, the facility shall be fully operational in 90 minutes.

6.2.2 To be declared operational the EOF must be available to and capable of performing the following functions:

- a. Manage the overall emergency effort and response resources.
- b. Provide radiological effluent and environs monitoring and assessment and offsite dose projections. If the EOF Dosecalc computer is out of service the EOF may still be declared operational if dose calculations are being performed outside the EOF.
- c. Notify federal, state, and local Emergency Response Organizations.

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6.2.2 (Continued)

- d. Provide recommendations to state and local agencies for public protective actions.
- e. Assessment and classification of the emergency.

6.2.3 The minimum EOF staffing required for the EOF to be declared operational is as follows:

- a. Offsite Emergency Coordinator
- b. One of the following:
 - (1) Radiological Emergency Manager, or
 - (2) Radiological Assessment Coordinator, or
 - (3) Radiological Assessment Dose Calculator (EOF)
- c. Plume Tracker
- d. Offsite Monitoring Team as follows:
 - (1) One monitor
 - (2) One driver/assistant
- e. Two communicators

6.2.4 Declaring the EOF Operational

- a. Declare the EOF operational when EOF staff is available and capable of performing the items listed in 6.2.2. The OEC informs the EOF Staff when the EOF is operational.
- b. EOF personnel receive turnover from personnel (TSC or Control Room) with current responsibility for the items listed in 6.2.2 using available communication equipment.
- c. As soon as possible, assume responsibility for the items listed in 6.2.2 from TSC or Control Room personnel.
- d. The OEC informs the ED when the EOF has assumed responsibility for the items listed in 6.2.2.
- e. The EOF Admin Director notifies the ENMC that the EOF is operational.
- f. The EOF Communicator notifies the TSC Communicator, state, local, and federal EOC's that the EOF is operational.

6.2.5 EOF Access Controls

- a. Access is limited to the following personnel:
 - (1) Members of the Emergency Response Organization whose name appears on the current Fitness for Duty List located at the EOF Entrance counter.

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6.2.5a (Continued)

- (2) State, Federal, and Local agency personnel displaying appropriate picture ID.

6.2.6 Access to EOFNOTE

The facility may be secured due to radiological release or if Food/Lodging Coordinator leaves the post.

a. Perform the following:

- (1) Lock the doors with the Master Key located in the Key Storage Area.

b. To grant access:

- (1) The person requesting access must state name and social security number if he/she is an Entergy employee. If the person is a State or Federal employee, he/she must state name and agency employed with.
- (2) Verify the Entergy personnel name and social security number with the EOF Identification Book. State or Federal personnel must present identification badge for verification.
- (3) Press the key button to release the door lock.
- (4) If the State/Federal employee does not have proper identification, the OEC, EOF Administrative Director, OEC Technical Assistant, or Technical/Engineering Support Manager must approve entry.
- (5) After verifications, personnel retrieve facility badge and sign in on EOF Monitoring Log.
- (6) During after hours, ask Entergy employee if they have consumed alcohol in the past five hours. If the answer is yes, the person must sign consent to test form.
- (7) If alcohol has not been consumed, the person may proceed to retrieve facility badge and sign in on EOF Monitoring Log.

c. Fitness for Duty

- (1) Entergy Operations personnel assigned to the EOF reporting for duty are asked if they have consumed alcohol within the previous five hours. If the answer is No, they are issued a badge and allowed unescorted access. If the answer is Yes, a consent to test form is presented to the individual for signature. The individual is provided with an escort while in the EOF until a breath test can be performed.

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6.2.6c (Continued)

- (2) If the Food and Lodging Coordinator is not available to perform breath test, Security must be contacted. The test is completed as soon as possible after the individual in question arrives at the EOF and has signed the consent form.
- (3) The Food and Lodging Coordinator performs breath analysis as follows:
 - (a) Verify operability of breath analysis equipment.
 - (b) Complete consent to test documentation.
 - (c) Conduct breath test.
 - (d) Attach test record data to consent to test.
 - (e) Present documentation to the EOF Administrative Director.
- (4) If the presence of alcohol is detected:
 - (a) If the results of the breathalyzer indicate .04 or above the individual will not be allowed to assume any EOF duties. Individuals in this classification that assume EOF duties without notifying the EOF Food and Lodging Coordinator or the OEC will be subject to for cause testing and the associated sanctions.
 - (b) If the results are between .01 and .039 the OEC may authorize the individual to assume EOF duties.
 - (1) Additional tests may be performed at periodic e.g., five [5] minute) intervals to determine if the alcohol level is rising or declining.
 - (c) The alcohol reading above the BAC cut-off will not be considered a positive test under this call-out process. Repeated failures to remain fit for duty while in a defined on-call status may result in the individual being referred to the EAP for evaluation or disciplinary action.

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6.3 EOF Habitability/Isolation/Frisking/Decontamination6.3.1 EOF Habitability

Radiological Condition	Action Level	Actions to be taken
1. Radiological Releases	Confirmed Release with Potential to Affect EOF	<ul style="list-style-type: none"> Establish contamination controls Notify OEC Recommend isolation of EOF <p style="text-align: center;"><u>and</u></p> <ul style="list-style-type: none"> Verify that all EOF personnel have signed in on the EOF Personnel Monitoring Log <p style="text-align: center;"><u>and</u></p> <ul style="list-style-type: none"> Increase Monitoring frequency
2. Direct External Radiation Exposure (Inside EOF)	≥ 0.5 mRem/hour external γ <u>or</u> ≥ 0.5 mRem/hour external β <u>or</u> any increase in dose rates above background	<ul style="list-style-type: none"> Perform all actions section 1 above <p style="text-align: center;"><u>and</u></p> <ul style="list-style-type: none"> Verify levels using other available instrumentation <p style="text-align: center;"><u>and</u></p> <ul style="list-style-type: none"> Notify RPM
	≥ 100 mRem/hour external γ <u>or</u> ≥ 500 mRad/hour external β	<ul style="list-style-type: none"> Perform all actions section 1 above <p style="text-align: center;"><u>and</u></p> <ul style="list-style-type: none"> Verify levels using other available instrumentation Notify RPM Recommend to OEC that EOF be evacuated Issue Self Reading Dosimeters
3. Airborne Iodine Concentration inside EOF	$\geq 1.0 \times 10^{-8}$ $\mu\text{Ci/cc}$	<ul style="list-style-type: none"> Perform all actions section 1 above <p style="text-align: center;"><u>and</u></p> <ul style="list-style-type: none"> Verify levels using other available instrumentation Notify RPM
	$\geq 2.4 \times 10^{-7}$ $\mu\text{Ci/cc}$	<ul style="list-style-type: none"> Perform all actions section 1 above <p style="text-align: center;"><u>and</u></p> <ul style="list-style-type: none"> Verify levels using other available instrumentation Notify RPM Recommend to OEC that EOF be evacuated

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6.3.2 EOF Radiological Monitoring

- a. The EOF Habitability Specialist performs periodic measurements of radioactive airborne, surface contamination, general area radiation levels if a radioactive release has occurred or as directed by the RAC.
- b. Tasks
 - (1) The EOF Habitability Specialist ensures that radiological surveys of the EOF are performed upon activation of the EOF, whenever a radiation monitor alarms, or as directed by the RAC. If the EOF installed radiation monitoring instrumentation is inoperable, these surveys must be performed at least once per hour.
 - (2) Radiological Monitoring is performed in accordance with reference 3.6.
 - (3) Report results of habitability surveys to the Radiological Assessment Coordinator.

6.3.3 EOF Isolation

- a. The OEC, upon consultation with the REM, may recommend isolation of the EOF. The OEC directs isolation as follows:
 - (1) The OEC tells the EOF Administrative Director to coordinate the EOF isolation.
 - (2) The EOF Administrative Director tells the EOF Facility Coordinator to isolate the EOF.
 - (3) The EOF Facility Coordinator isolates the EOF in accordance with the EOF systems manual.

6.3.4 Frisking (Personnel and Materials Contamination Monitoring)

- a. Frisking is required to limit the introduction of radioactive contamination into the EOF.
- b. A "frisker" station must be set up at the ground level entrance in accordance with EOF Radiological Monitor Checklist (Form EPP 33-10). This station should accommodate personnel arriving at the EOF from outside and inside the ESC.
- c. All personnel entering the EOF must perform a whole body frisk.
- d. All material is frisked before it can be brought into the EOF.

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6.3.4 (Continued)

- e. See Attachment II for Frisking Instructions.

NOTE

The REM may waive frisking requirements based on actual or potential release conditions.

6.3.5 Personnel Decontamination

- a. Decontamination of EOF personnel must be performed by knowledgeable people designated by the REM.
- b. Personnel decontamination is documented on Personnel Contamination Report. (These forms are located in the EOF decon shower.)
- c. If the contaminated person is injured, decontamination procedures are postponed until injuries demanding immediate care are attended to. The REM should contact the TSC and arrange for Plant Staff Health Physics assistance.
- d. Operation of the decontamination shower is addressed in the EOF Systems Manual.
- e. Cases of significant levels or persistent external contamination or any real or suspected internal contamination must be reported to the REM immediately.

6.4 Briefings

- 6.4.1 The OEC is briefed by the Technical/Engineering Support Manager, REM and the EOF Administrative Director on the status of the emergency and the capability of the EOF to start operations.
- 6.4.2 The OEC briefs the EOF staff on plant status and corrective actions in progress and identifies offsite response actions required to support the plant.
- 6.4.3 The OEC briefs the state, local and federal agency representatives on the status of the emergency and corrective actions in progress.
- 6.4.4 The REM ensures that 10CFR19 Indoctrination Briefings, as necessary, are conducted in accordance with reference 3.7.

7.0 BACKUP EOF (BEOF)7.1 Location

- 7.1.1 The BEOF is located at the Baxter Wilson Steam Electric Station in Vicksburg. See Attachment I for map.

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7.2 Activation of the BEOF

- 7.2.1 If the EOF is not habitable or cannot perform its required functions, the OEC directs the activation of the BEOF.
- 7.2.2 The OEC ensures that the Shift Supervisor at Baxter Wilson Steam Electric Station is notified. The BWSES Shift Supervisor has custody of the BEOF keys and will provide them to persons listed on the BEOF Access List.
- 7.2.3 When relocating personnel from the EOF to the BEOF, the OEC:
 - a. Requests from the Radiation Emergency Manager, a determination on the acceptability of normal egress routes from the site.
 - b. Transfers the following functions to the TSC prior to EOF deactivation:
 - (1) Command and Control
 - (2) Communication with federal, state and local agencies
 - (3) Radiological Assessment and Protective Action Recommendations
 - (4) Emergency Classification/Assessment
 - c. Transfers the following functions to the OSC prior to EOF deactivation:
 - (1) Dispatch of OMTs
 - (2) Control of OMTs
 - d. Ensures the offsite agencies supporting the emergency response and all Emergency Response Facilities are notified of the move.
 - e. Ensures all logbooks, current paperwork and position badges are taken to the BEOF.
- 7.2.4 Prior to leaving the EOF, the EOF communicator will:
 - a. Contact the TSC Communicator and discuss status of current notifications to federal, state and local agencies.
 - b. Transfer responsibilities for notifications of federal, state and local agencies to TSC.

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7.3 Setup

- 7.3.1 Upon arrival at the BEOF, the Emergency Support Manager ensures the BEOF is set up using the BEOF SETUP CHECKLIST (Form EPP 33-14 or similar). The EOF Administrative Director is to be advised when the setup is completed.
- 7.3.2 The following personnel report to the BEOF and assist the Emergency Support Manager in the BEOF setup:
 - a. EOF Facility Coordinator
 - b. Food and Lodging Coordinator
 - c. EOF Communicators
- 7.3.3 The dry erase boards are used to display information normally displayed on the EOF status boards.
- 7.3.4 Upon arrival the EOF Communicator:
 - a. Contacts the TSC Communicator and discusses the status of current notification to federal, state and local agencies.
 - b. Requests that TSC fax copies of any notifications made to state and local agencies not carried to BEOF.
 - c. Provides notification status and forms to EOF Administrative Director.
- 7.3.5 The EOF Administrative Director upon arrival:
 - a. Reviews the BEOF Setup Checklist with the Emergency Support Manager.
 - b. Reviews the status of current notification of federal, state and local agencies from the EOF Communicator.
 - c. Reviews BEOF Staffing Requirements (Form EPP 33-13), and ensures the BEOF is appropriately staffed.
 - d. Brief the OEC on overall BEOF status.
- 7.3.6 The REM upon arrival:
 - a. Contacts the RPM and obtain plant status, radiological data, meteorological data, and PARs
 - b. Ensures the Radiological Assessment Dose Calculator (EOF) locates and uses the Dosecalc computer.
 - c. Ensures the Plume Tracker establishes communications with the OMT.
 - d. Briefs the OEC on Radiological Assessment status.
- 7.3.7 EOF Engineering (Civil, Electrical, and Mechanical) may access needed plant diagrams/drawings via IDEAS on the receptionist's computer.

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7.4 Staffing

- 7.4.1 Due to space limitations, the BEOF will be staffed in accordance with the BEOF Staffing Requirements (Form EPP 33-13).
- 7.4.2 The Offsite Monitoring Teams (OMTs) are controlled by the Operations Support Center (OSC). Communications between the OMTs and the OSC will be maintained until the BEOF is declared operational.

7.5 Security

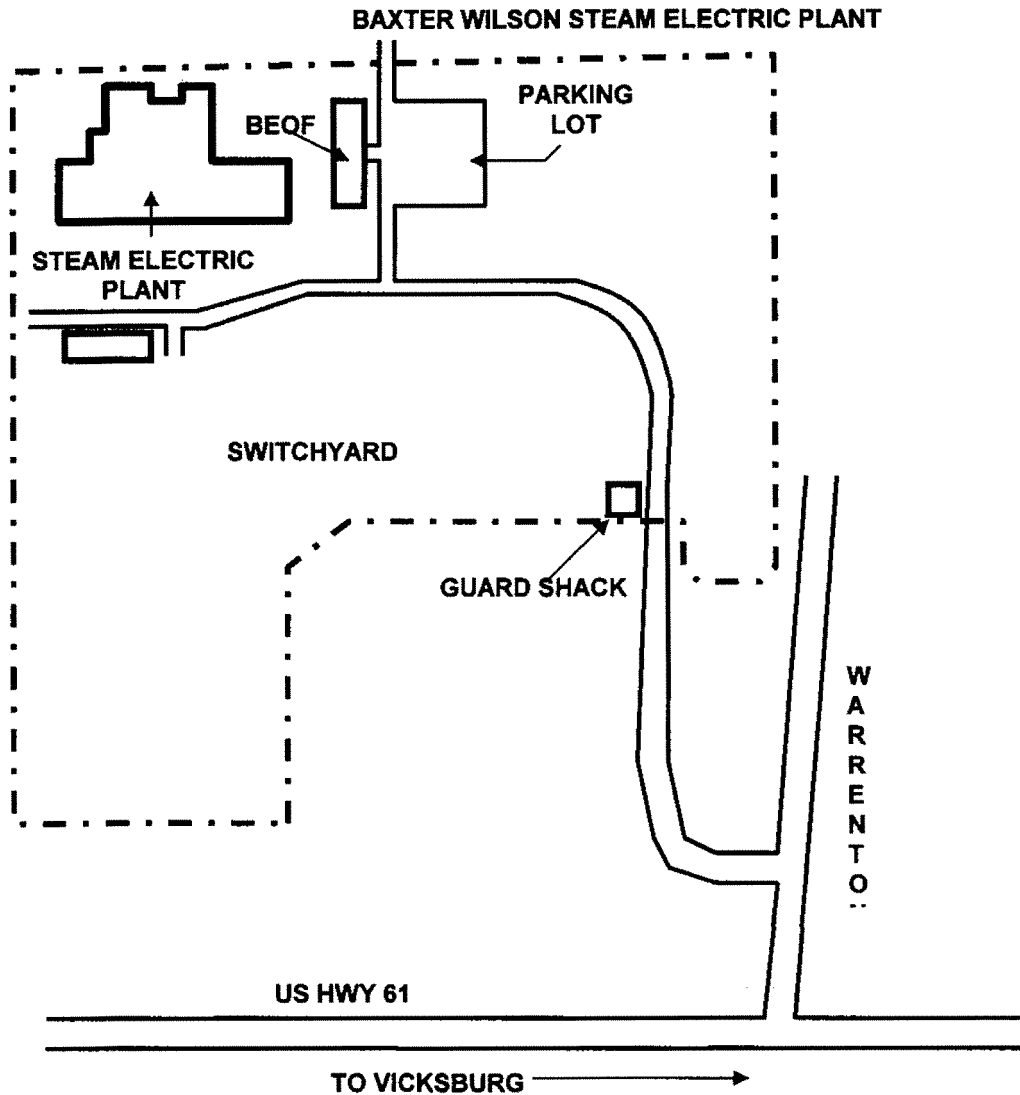
- 7.5.1 Industrial security and access control for the BEOF are established at the Baxter Wilson gate. No further security measures are required.

7.6 Operation

- 7.6.1 The OEC declares the BEOF operational when:
 - a. Sufficient personnel are present to man the minimum BEOF staffing requirements.
 - b. Advised by the EOF Administrative Director that the BEOF is ready to perform notifications to federal, state, and local agencies.
 - c. Advised by the REM that the BEOF is ready to perform Offsite Radiological Assessment.
 - d. Advised by the EOF Administrative Director that the BEOF is physically ready to support operation.
- 7.6.2 After declaring the BEOF operational:
 - a. Transfer the following functions from the TSC to the BEOF:
 - (1) Command and Control
 - (2) Communications with federal, state and local agencies
 - (3) Radiological Assessment
 - b. Transfer the following functions from the OSC to the BEOF:
 - (1) Dispatch of OMTs
 - (2) Control of OMTs

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MAP TO BAXTER WILSON STEAM ELECTRIC STATION



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MANUAL WHOLE-BODY FRISKING INSTRUCTIONS

1. Check frisker for the following:
 - a. Frisker is turned "ON."
 - b. Range Selector switch is in the "X1" position.
 - c. Response Selector switch is in the "SLOW" position.
 - d. Volume control is turned up so that an audible count rate is heard.
2. The probe should be held about 1/2-inch from the surface being surveyed. The probe speed should be approximately 1 to 2 inches per second.
3. The following guidelines should be followed for frisking:
 - a. Without picking up probe, carefully frisk both sides of hands (5 secs per hand).
 - b. Pick up probe and frisk head and/or hard hat (5 seconds).
 - c. Frisk face, paying careful attention to nose and mouth (5 secs - minimum).
 - d. Frisk neck, holding probe next to neck (5 secs - minimum).
 - e. Frisk front of trunk, paying careful attention to chest/stomach area (5 secs - min).
 - f. Frisk remainder of body - arms, legs, knees, buttock and back (about 2 mins).
 - g. Frisk bottom of feet (5 secs per foot).
 - h. Return probe to face up or side position for the next person.
4. While frisking, listen for an audible increase in the count rate. The audible response is much faster than the meter response, and therefore alerts you to the presence of contamination much sooner. If an increase in the audible count rate is detected, resurvey that particular area again.
5. If the frisker indicates 100 cpm (or greater) above background, REMAIN AT THE FRISKER and have someone contact EOF HABITABILITY SPECIALIST for assistance.

NOTE

A proper Whole-Body Frisk will take approximately 3 minutes to perform correctly.

Materials Frisking

- (1) Perform steps 1 and 2 of whole body Frisking instructions.
- (2) Listen for audible increase in count rate.
- (3) If the frisker indicates 100 cpm (or greater) above background, contact the Habitability Specialist for assistance.