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FEB 10 2016

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-001

**SUSQUEHANNA STEAM ELECTRIC STATION
EMERGENCY PLAN REVISION 59
PLA-7439**

**Docket Nos. 50-387
and 50-388**

The purpose of this letter is to transmit Revision 59 to the Susquehanna Steam Electric Station (SSES) Emergency Plan. In accordance with the requirements of 10 CFR 50.54(q), Revision 59 to the Emergency Plan has been made without prior Commission approval as it does not decrease the effectiveness of the Plan, and the Plan, as changed, continues to satisfy the applicable requirements of 10 CFR 50.47(b) and Appendix E to 10 CFR 50. Revision 59 was effective on January 15, 2016.

The specific changes contained in Revision 59 are listed in Attachment 1. The revised Plan is provided in Attachment 2. Attachment 3 contains the completed 10 CFR 50.54(q) screens and evaluations.

Should you have any questions regarding this submittal, please contact Mr. Jason Jennings, Manager – Nuclear Regulatory Affairs at (570) 542-3155.

There are no regulatory commitments identified in this letter.

Sincerely,

A handwritten signature in black ink, appearing to be "J. Franke", written over a large, stylized circular flourish.

Jon A. Franke
Site Vice President

Attachment 1 – List of Changes Contained in Revision 59 to SSES Emergency Plan
Attachment 2 – Revision 59 to SSES Emergency Plan
Attachment 3 – 10 CFR 50.54(q) Screens and Evaluations

AX45
NRR

Copy: NRC Region I (Attn: Chief, Emergency Preparedness Branch – DRS)
Mr. J. E. Greives, NRC Sr. Resident Inspector
Ms. T. E. Hood, NRC Project Manager
Mr. M. Shields, PA DEP/BRP
Director, Division of Spent Fuel Storage and Transportation

Attachment 1 to PLA-7439

List of Changes Contained in
Revision 59 to SSES Emergency Plan

Emergency Plan Changes Revision 58 to Revision 59

1. Added additional EP Implementing Procedures, EP Administrative procedure, in addition to EP Position Specific (EP-PS) procedures (that were already present) to Appendix C. (ACT-46-CR-2015-11640)
2. Added the following to the RM responsibilities in Section 6.3.1.1 “Authorize issuance of Radioprotective Drugs in accordance with prescribed procedures. This should include consultation with the Dose Assessment Supervisor and medical consultants.” (To align with ED responsibilities in Section 6.2.1.)
3. Added “or Control Room” in Section 6.0 and 6.3 when discussing the EOF is required to activate following a SAE or GE and take over the management of the emergency regardless if the TSC or Control Room is in control.
4. Appendix A, Changed the Manager of EP is responsible for reviewing letters of agreement every two years to ‘yearly’ and added LOAs are to be completed annually to Section 9.2.1. (DI-2015-20163)
5. Added language to describe the Alternate OSC and TSC at the EOF in Section 8.2.
6. Changed EP from meaning Emergency Plan to meaning Emergency Preparedness in Section 2.0.
7. Changed ANS tone alerting from 3-5 to just 3 minutes in Section 8.5 to match the approved FEMA design report for SSES.
8. Corrected typographical error on Table 6.1 in regards to when the EPlan and NRC communicators are required. Added NRC Comm and EPlan Comm as required for TSC activation in Figure 6.2. Updated Figure 6.7 Offsite Communications to clearly show which is NRC and which is EPlan Communicator. Removed EOF Communicator from the NRC side. (ACT-01-CR-2015-29806)
9. Corrected incorrect reference to Figure 6.3 in Table 6.1 to Figure 6.4 and changed the # footnote to state “2 are dispatched from the vicinity of the plant within 60 minutes” to match PLA-5589. (ACT-01-CR-2015-07468)
10. Updated Appendix J Section J to include Security Coordinator, Control Room Emergency Director and TSC Emergency Director Position. Updated 7.3 Protective Actions: second sentence add after SSES Exclusion Area and Site Boundary. Third sentence remove the words SSES Exclusion Area and replace them with Site Boundary. Clarified the definition of On-Site to be “the area within the PROTECTED AREA”. Updated 7.3.1.4 by replacing “within the SSES Exclusion Area” with “on-site.” (CR-2015-26179)

11. Revised 7.3.1.3 to include direction for when accountability is performed after a rapid evacuation by now stating "For certain security related events, an evacuation of non-essential personnel may be conducted prior to performing accountability. Security will collect badges upon egress from the site and then perform accountability." (ACT-37-CR-2015-11640)
12. Revised Section 9.2.1 to include the regulatory requirement for when the ETE shall be updated by adding "Perform an annual review of the Evacuation Time Estimate (ETE) to ensure 10CFR50 Appendix E Section IV and NUREG 0654 Element J.8 requirements are maintained. Update the full ETE should the criteria from Appendix E be met and re-submit the ETE to the NRC." (ACT-48- CR-2015-11640)
13. Added non-delegable duties to the ED and RM in Sections 6.2.1 and 6.3.1.1 to state "Classification of EALs, Notification of EALs and Protective Action Recommendations." (ACT-38-CR-2015-11640)
14. Corrected Attachment J Section H number 2 from 8.2.2 to 8.1.2.2. (AR-2015-19300)
15. Added RM and Dose Assessment Personnel to Table 9.1. (DI-2015-20156)
16. Revised Table 7.3 to state under Section A.c. "Evacuate 2 mile radius, if NOT previously recommended" and to state "If the state has informed SSES of impediments to evacuation recommend shelter in place instead of evacuate." (AR-2015-19129)
17. Updated Table 7.3 Section B language to change Quantity to Volume and to add diluted sum. (Comment from a DASU)
18. Corrected LRW in Appendix D to read $10 - 10^7$ versus the current value of $10 - 10^6$. (AR-2015-18334)
19. Changed SRC (Susquehanna Review Committee) to NSRB (Nuclear Safety Review Board).
20. Revised EPlan to align with the security plan for the definition of Protected Area. (AR-2015-28187)

21. Revised Appendix A to state “These agreements have been established to assure all parties are aware of their commitment to SSES and the public in the vicinity of the SSES during an emergency including a HOSTILE ACTION event.”
“Emergency including a HOSTILE ACTION event” was added to the sentence.
(AR-2014-11179)
22. Updated signed CNO Letter to include Talen Energy letterhead. (AR-2015-02601)
23. Revised Appendix J to show Appendix D, Enclosure 5 fulfills NUREG 0654 Section II.C.3. Updated Appendix D, Enclosure 5 to clearly state the laboratories that SSES uses and their capabilities. (ACT-39-CR-2015-11640)
24. Updated Appendix J, Section J.10.a to also include Chapter 7, Section 7.3.1.4 & Figure 8.1 as meeting the NUREG 0654 requirement. (ACT-45-CR-2015-11640)

Attachment 2 to PLA-7439
Revision 59 to SSES Emergency Plan

SUSQUEHANNA NUCLEAR, LLC

SUSQUEHANNA STEAM ELECTRIC STATION

EMERGENCY PLAN

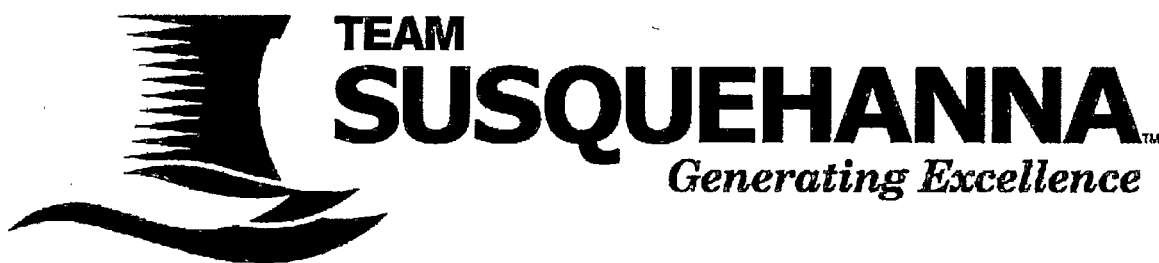
REVISION 59

DATE: January 15, 2016

PORC MEETING: 16-01-05

SUSQUEHANNA NUCLEAR, LLC

SUSQUEHANNA STEAM ELECTRIC STATION



EMERGENCY PLAN

***THIS DOCUMENT HAS BEEN UPDATED TO
INCLUDE REVISIONS THROUGH 59
DATED: January 15, 2016***

EFFECTIVE PAGES

NOTE: PPL Susquehanna, LLC was reorganized to Susquehanna Nuclear, LLC. Susquehanna is now a part of parent company Talen instead of PPL. Agreements signed in the past as PPL Susquehanna, LLC will be honored and carried forward by Susquehanna Nuclear, LLC.

1. Revision 59 of the Emergency Plan is taking credit for the 2016 annual review of the Emergency Plan.
2. Added additional EP Implementing Procedures, EP Administrative procedure, in addition to EP Position Specific (EP-PS) procedures (that were already present) to Appendix C (ACT-46-CR-2015-11640)
3. Added the following to the RM responsibilities in section 6.3.1.1 "Authorize issuance of Radioprotective Drugs in accordance with prescribed procedures. This should include consultation with the Dose Assessment Supervisor and medical consultants." To align with ED responsibilities in 6.2.1.
4. Added "or Control Room" in section 6.0 and 6.3 when discussing the EOF is required to activate following a SAE or GE and take over the management of the emergency regardless if the TSC or Control Room is in control.
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25. Updated Appendix J, Section J.10.a to also include Chapter 7, Section 7.3.1.4 & Figure 8.1 as meeting the NUREG 0654 requirement. (ACT-45-CR-2015-11640)

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1.0 DEFINITIONS

1. ACCIDENT - an unforeseen and unintentional event which may result in an emergency.

2. ACTIVATE - an emergency response facility has sufficient staffing to perform required functions and the facility has taken over command and control of the emergency. The positions required to activate the TSC, OSC and EOF are specified with an * in Figures 6.2, 6.3 and 6.4. The terms "activated", "activation" "activation time" and "take over management of the emergency" have the same definition.

3. AFFECTING SAFE SHUTDOWN - Event in progress has adversely affected functions that are necessary to bring the plant to and maintain it in the applicable HOT or COLD SHUTDOWN condition. Plant condition applicability is determined by Technical Specification LCOs in effect.

Example 1: Event causes damage that result in entry into an LCO that requires the plant to be placed in HOT SHUTDOWN. HOT SHUTDOWN is achievable, but COLD SHUTDOWN is not. This event is not "AFFECTING SAFE SHUTDOWN."

Example 2: Event causes damage that result in entry into an LCO that requires the plant to be placed in COLD SHUTDOWN. HOT SHUTDOWN is achievable, but COLD SHUTDOWN is not. This event is "AFFECTING SAFE SHUTDOWN."

4. ALERT - Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.

5. ANNUAL - occurring within calendar year starting January 1 and ending December 31.

6. ALERT NOTIFICATION SYSTEM - sirens with ratings of 121 dB at 100' within the ten-mile EPZ around the Susquehanna Steam Electric Station. Siren location was determined by a detailed study including field surveys, actual determination of average background noise level, and consideration of population distribution within the 10-mile EPZ.

7. ASSESSMENT ACTIONS - those actions taken during or after an incident to obtain and process information that is necessary to make decisions to implement specific emergency measures.

8. BIENNIAL EXERCISE - NRC/DHS-FEMA exercise performed on alternate years, to be completed within the calendar year scheduled.

9. BIWEEKLY - occurring on alternate weeks, within the 7-day week.

10. BOMB - refers to an explosive device suspected of having sufficient force to damage plant systems or structures.

11. CDE - the Committed Dose Equivalent; dose to an organ due to an intake of radioactive material during the 50 year period following the intake.

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12. CIVIL DISTURBANCE - A CIVIL DISTURBANCE COULD BE FOREWARNED OR SPONTANEOUS. Information of a CIVIL DISTURBANCE could be expressed by telephone, mail, hand delivered or other means. Plans of a CIVIL DISTURBANCE may be given directly or indirectly through a law enforcement agency, mass media, organization or some other party. A group of unexpected or unauthorized individuals is observed outside the PROTECTED AREA or facility management is informed of plans to stage such a gathering (e.g. labor picket line, protest demonstrations, etc.)
13. COLUMBIA COUNTY EMERGENCY MANAGEMENT AGENCY (CCEMA) - emergency response coordinating agency for Columbia County, responsible for implementing off-site action upon direct notification from Susquehanna SES or PEMA.
14. CONFINEMENT BOUNDARY - is the barrier(s) between areas containing radioactive substances and the environment.
15. CONTAINMENT CLOSURE - is considered to be Secondary Containment as required by Technical Specifications.
16. CONTROL ROOM - the location of the Control Panels from which the reactor and its auxiliary systems are controlled.
17. CORPORATE LEADERSHIP COUNCIL (CLC) - the Talen Management group which determines major policy commitments for the company. The CLC membership includes the President of the company and other senior executives.
18. CORRECTIVE ACTIONS - those emergency measures taken to ameliorate or terminate an emergency situation.
19. DEPARTMENT OF ENVIRONMENTAL PROTECTION/BUREAU OF RADIATION PROTECTION (DEP/BRP) - the State agency responsible to provide guidance and recommendations for specific off-site protective measures.
20. DEPARTMENT OF HOMELAND SECURITY – Federal Emergency Management Agency (DHS-FEMA) - within the context of this plan, serves as the primary contact for requests for Federal assistance; lead coordinator all non-technical federal response.
21. DOSE PROJECTION - a calculated estimate of the potential radiation dose to individuals at a given location, normally off-site, (determined from the quantity of radioactive material released and the appropriate meteorological transport and dispersion parameters).
22. DOSE RATE - the amount of radiation an individual can potentially receive per unit of time.
23. EFFECTIVE DOSE EQUIVALENT (EDE) - the sum of the products of the dose equivalent to the organ or tissue and the weighting factors applicable to each of the body organs or tissues that are irradiated.
24. EMERGENCY ACTION LEVELS (EAL) - operational or radiological parameters which, when exceeded, require the implementation of portions of this plan. EALs for various emergency conditions are specified in Section 5 Tables R, F, M, O, E and C.
25. EMERGENCY ACTIONS - those steps taken, as a result of exceeding an Emergency Action Level in the Emergency Plan, to ensure that the situation is assessed and that the proper corrective and/or protective actions are taken.

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26. EMERGENCY ALERT SYSTEM (EAS) – radio and television broadcast system used by public emergency management officials to notify the public concerning protective actions to be taken in the event of natural disasters, radiological protective actions, and other information of immediate impact to the public. Formerly referred to as the Civil Defense Emergency Broadcast System.
27. EMERGENCY CONDITION - the characterization of several classes of emergency situations consisting of exclusive groupings including the entire spectrum of possible radiological emergency situations. The four classes of emergencies, listed in increasing severity, which Susquehanna has incorporated into this Emergency Plan, are outlined in Section 5.0 of this plan.
28. EMERGENCY COORDINATORS - designated Susquehanna SES staff members responsible for coordinating specific emergency organization functions.
29. EMERGENCY DIRECTOR (ED) - the Susquehanna individual responsible for direction of on-site activities during an emergency at the Susquehanna SES.
30. EMERGENCY OPERATIONS CENTERS - designated state and county emergency management agency headquarters facilities designed and equipped for the purpose of exercising effective coordination and control over disaster operations carried out within their jurisdiction.
31. EMERGENCY OPERATIONS FACILITY - Emergency Response Facility co-located with the Joint Information Center in Plains Township, Pennsylvania, to provide continuous coordination and evaluation of Susquehanna activities during an emergency having or potentially having environmental consequences (Reference REFERENCES, Section 3.19).
32. EMERGENCY PLAN BOUNDARY - same as the EXCLUSION AREA, i.e., that area around Susquehanna SES within a radius of 1800 feet determined in accordance with 10 CFR 100.11. The dose criterion of 10 CFR 50.67 applies at the EXCLUSION AREA boundary.
33. EMERGENCY PLAN IMPLEMENTING PROCEDURES - specific procedures defining in detail the action to be taken in the event of an emergency condition. The Emergency Plan Implementing Procedures will be separate from, but may incorporate and refer to, normal plant operating procedures and instructions, Emergency Plan Position Specific Procedures and Emergency Plan Technical Procedures.
34. EMERGENCY PLAN TECHNICAL PROCEDURES – procedures describing how to perform processes associated with the Emergency Plan. These procedures may include processes such as Emergency Classification or Protective Action. Used together with Emergency Plan Position Specific Procedures, these procedures are designed to implement the Emergency Plan during a declared emergency.
35. EMERGENCY PLANNING ZONE - there are two Emergency Planning Zones. The first is an area, approximately 10 miles in radius around the Susquehanna SES, for which emergency planning consideration of the plume exposure pathway has been given in order to ensure that prompt and effective actions can be taken to protect the public in the event of an accident. The second is an area approximately 50 miles in radius around the Susquehanna SES, for which emergency planning consideration of the ingestion exposure pathway has been given.

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36. EMERGENCY PLAN POSITION SPECIFIC PROCEDURES - procedures describing how to perform tasks assigned to emergency positions. Each procedure includes an overview of the position's tasks, detailed instructions, and relevant material. Used together, these procedures are designed to implement the Emergency Plan during a declared emergency.
37. EMERGENCY RESPONSE ORGANIZATION (ERO) - The SSES organization that is activated when an emergency classification has been declared that meets one of the four emergency classifications.
38. EXCLUSION AREA - is a circle of radius 1800 feet with the center at the common release point on the Unit 1 and Unit 2 Reactor Buildings as determined in accordance with 10 CFR100.11. The dose criterion of 10 CFR 50.67 applies at the EXCLUSION AREA boundary.
39. EXPLOSION - An EXPLOSION is a rapid, violent, unconfined combustion, or a catastrophic failure of pressurized equipment that imparts energy of sufficient force to potentially damage permanent structures, systems, or components.
40. EXTORTION - is an attempt to cause an action at the station by threat of force.
41. FIRE - is combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.
42. FULLY FUNCTIONAL- all minimum required staff as defined in Table 6.1 and the positions designated by dashed lines in Figures 6.2, 6.3 and 6.4 are present.
43. GENERAL EMERGENCY - Events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.
44. HOSTAGE - is a person(s) held as leverage against the station to ensure that demands will be met by the station.
45. HOSTILE FORCE - one or more individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.
46. HOSTILE ACTION- An act toward a Nuclear Power Plant or its personnel that includes the use of violent force to destroy equipment, take hostages, and/or intimidate the plant to achieve an end. This includes attack by air, land, or water using weapons, explosives, projectiles, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the power plant. Non-terrorism based EALs should be used to address such activities, (e.g. violent acts between individuals in the owner controlled area).
47. IMMEDIATELY DANGEROUS TO LIFE AND HEALTH (IDLH) - A condition that either poses an immediate threat to life and health or an immediate threat of severe exposure to contaminants which are likely to have adverse delayed effects on health.

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48. INTRUSION / INTRUDER - is a person(s) present in a specified area without authorization. Discovery of a BOMB in a specified area is indication of INTRUSION into that area by a HOSTILE FORCE.
49. INITIATING CONDITION (IC) - one of a predetermined subset of nuclear power plant conditions where either the potential exists for a radiological emergency, or such an emergency has occurred.
50. ISFSI - Independent Spent Fuel Storage Facility – A series of adjacent concrete structures located within the SSES Protected Area that contain spent fuel storage canisters.
51. JOINT INFORMATION CENTER - the designated location from which news releases, press conferences and other media interfacing can be provided.
52. LDE - Lens Dose Equivalent; the external exposure to the lens of the eye.
53. LOWER FLAMMABILITY LIMIT (LFL) – The minimum concentration of a combustible substance that is capable of propagating a flame through a homogenous mixture of the combustible and a gaseous oxidizer.
54. LUZERNE COUNTY EMERGENCY MANAGEMENT AGENCY (LCEMA) - the host county emergency response coordinating agency, responsible for implementing off-site action upon either direct notification from the Susquehanna SES or from PEMA.
55. MONTHLY – occurring within the calendar month.
56. NORMAL PLANT OPERATIONS - activities at the plant site associated with routine testing, maintenance, or equipment operations, in accordance with normal operating or administrative procedures. Entry into abnormal or emergency operating procedures, or deviation from normal security or radiological controls posture, is a departure from NORMAL PLANT OPERATIONS.
57. NOTIFICATION OF UNUSUAL EVENT – Events are in process or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.
58. NUCLEAR REGULATORY COMMISSION (NRC) - within the context of this plan, the Federal agency responsible for verifying that appropriate emergency plans have been implemented and for conducting investigative activities associated with a radiological emergency.
59. OFF-SITE - any area outside the Emergency Plan Boundary surrounding the Susquehanna SES.
60. OFF-SITE RADIOLOGICAL INCIDENT - any radiation incident affecting areas beyond the Emergency Plan boundary and posing a significant threat to public health and safety.
61. ON-SITE – the area within the PROTECTED AREA.

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- 62. OPERATIONAL SUPPORT CENTER (OSC) - the primary on-site assembly area for operations support team personnel during the initial phase of an emergency. The primary OSC is not in the control structure but is located in an administrative building. In the event of a large radioactive release, the OSC may be relocated to the back-up OSC that is located in the control structure.
- 63. OWNER CONTROLLED AREA - includes the area within the expanded security perimeter, i.e. the areas that are bordered by the Vehicle Barrier System. The OWNER CONTROLLED AREA encompasses the Monitored OWNER CONTROLLED AREA (MOCA) as defined in Security Procedures.
- 64. PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY (PEMA) - within the context of this plan, the lead state-agency for radiological emergency planning, response and recovery and for providing guidance to local government for development of radiological emergency plans and programs.
- 65. PLANT PROCEDURES - those procedures utilized by the plant operations staff to control and manipulate the plant under both normal and abnormal circumstances.
- 66. PROTECTED AREA - An area encompassed by Physical Barriers and to which access is controlled.
- 67. PROTECTIVE ACTION GUIDES (PAG) - the projected dose to reference personnel, or other defined individual, from an unplanned release of radioactive material at which a specific protective action to reduce or avoid that dose is recommended.
- 68. PROTECTIVE ACTIONS - those emergency measures taken for the purpose of preventing or minimizing radiological exposures.
- 69. QUARTERLY - occurring during the calendar quarter.
- 70. RADIATION DOSE - the quantity of radiation absorbed by the body or any portion of the body.
- 71. RADIATION MONITORING SYSTEM - an in-plant system consisting of ARMs, CAMs, and process monitors that contributes to personal protection, equipment monitoring, and accident assessment by measuring and recording radiation levels and concentrations at selected locations throughout the station. Reference Appendix D.
- 72. RADIOACTIVE MATERIAL - any solid, liquid, or gas which emits radiation spontaneously.
- 73. RADIOLOGICAL EMERGENCY RESPONSE TEAM - the response team from the Division of Radiological Health, State Board of Health, Pennsylvania Emergency Management Agency, and other State agencies, which will be dispatched to the scene of radiological emergencies. The team provides technical guidance and other services to local governments or an affected nuclear facility.

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- 74. RADIOLOGICALLY CONTROLLED AREA (RCA) - any temporary or permanent area established by Health Physics, which is controlled for purposes of protection from exposure to radiation or radioactive materials. Typically, the Radiologically Controlled Area is defined by the outer perimeters of the Turbine, Reactor, and Radwaste Buildings, portions of the Control Structure, and portions of LLRWHF.
- 75. RADIOLOGICALLY CONTROLLED AREA EVACUATION - evacuation of nonessential individuals from some or all of the Radiologically Controlled Area.
- 76. RECOVERY ACTIONS - those actions taken after the emergency to restore the plant as nearly as possible to its pre-emergency condition.
- 77. RECOVERY MANAGER - the individual responsible for the management of emergency response activities in the EOF during an emergency at the Susquehanna Steam Electric Station.
- 78. REM (Acronym for roentgen equivalent man) - a unit of measure of radiation dose in biological tissue.
- 79. REMOTE ASSEMBLY AREA - a designated area, outside the exclusion area, for the assembly of evacuated plant personnel, if necessary, during a Site Evacuation. The Primary Remote Assembly Area is the Susquehanna Energy Information Center. The alternate assembly area is the West Building.
- 80. REMOTE MONITORING SYSTEM - fixed radiation detectors located near the site perimeter and mobile monitoring equipment to locate and assess elevated radiation levels.
- 81. ROUTE ALERTING TEAMS - a back-up to the siren system that is implemented, as necessary, in the event of siren failure or to alert persons or areas that may not be within the sound of the sirens. Route alerting is a municipal responsibility and is accomplished by municipal route alert teams traveling in vehicles along preplanned routes delivering the following message: "There is an emergency at the Susquehanna Steam Electric Station; please tune to your Emergency Alert Station."
- 82. SDE - Shallow Dose Equivalent; external exposure of the skin or extremity which is measured at 0.007 cm in tissue.
- 83. SABOTAGE - is deliberate damage, mis-alignment, or mis-operation of plant equipment with the intent to render the equipment inoperable. Equipment found tampered with or damaged due to malicious mischief may NOT meet the definition of SABOTAGE until this determination is made by security supervision.
- 84. SAFE SHUTDOWN SYSTEMS/EQUIPMENT - consists of the following: Diesel Generators, HPCI, Core Spray, Standby Gas Treatment System, RCIC, 4kV Safeguard Buses, ESW, ADS, RHR, RHRSW, Remote Shutdown Panels and DC Vital Buses.
- 85. SECURITY CONDITION - Any Security Event as listed in the approved security contingency plan that constitutes a threat/compromise to site security, threat/risk to site personnel, or a potential degradation to the level of safety of the plant. A SECURITY CONDITION does not involve a HOSTILE ACTION.

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- 86. SHIFT MANAGER – the individual who acts in the capacity of Susquehanna Steam Electric Station emergency manager immediately upon concurrence of an emergency as described in the SSES Emergency Plan. The designation Shift Manager is synonymous with the designation Shift Supervisor and may be used interchangeably in the emergency plan. Both terms designate the same individual.
- 87. SIGNIFICANT TRANSIENT - is an UNPLANNED event involving one or more of the following: (1) Reactor Re-circulation System runback involving a power reduction of over 25% thermal reactor power, (2) electrical load rejection >25% full electrical load, (3) Reactor Trip, (4) ECCS Actuations, or (5) thermal power oscillations >10%.
- 88. SITE AREA EMERGENCY – Events are in process or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or HOSTILE ACTION that results in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) that prevent effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels that exceed EPA Protective Action Guideline exposure levels beyond the site boundary.
- 89. SITE BOUNDARY - that line, beyond which the land is not owned, leased or otherwise controlled by the licensee. (Susquehanna drawing C243786, Sh 1, "Site Facilities and Boundary Map.")
- 90. SITE EVACUATION - evacuation of all non-essential personnel from the Exclusion Area.
- 91. STATE - the Commonwealth of Pennsylvania.
- 92. STATION ACCOUNTABILITY AREAS - areas designated for the gathering of individuals for the purpose of personnel accountability. Typically these are large areas with installed card readers to facilitate electronic accounting for personnel. Specific locations are defined in station procedures.
- 93. STRIKE ACTION - is a work stoppage within the PROTECTED AREA by a body of workers to enforce compliance with demands made on SSES. The STRIKE ACTION must threaten to interrupt NORMAL PLANT OPERATIONS.
- 94. SUSQUEHANNA NUCLEAR, LLC – subsidiary company of Talen Energy Corporation that owns and operates Susquehanna Steam Electric Station. The Emergency Plan will refer to this company as Susquehanna.
- 95. SUSTAINED HIGH WINDS - winds whose speed exceeds the specified value for greater than 1 minute. Wind gusts of shorter duration do not meet this criterion. SSES FSAR Section 3.3 "Wind and Tornado Loadings specifies the 80mph design limit for SSES structures. FSAR Section 3.3.1.1 "Design Wind Velocity" references ASCE document: "Wind Forces on Structures," ASCE paper No. 3269, Transaction Volume 126, Part II (1961), Pg. 1124. The ASCE paper provides guidance for the use of the term sustained when dealing with wind loadings of structures.

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96. TECHNICAL SUPPORT CENTER - a designated on-site location where the conditions during and after an accident can be analyzed to provide technical and radiological assessments of the accident to the Emergency Director. In the event of certain hazards preventing site access or certain security related events, personnel who normally report to the Technical Support Center may report to the Emergency Operations Facility where arrangements will be made to accommodate TSC-specific functions not assumed by the EOF. The alternate TSC will be activated as soon as possible to support the site; however, it is recognized that the activation time for the alternate TSC may exceed 60 minutes.*
97. TEDE - Total Effective Dose Equivalent; integrated doses consisting of the sum of external doses from plume shine, 50 year committed effective dose equivalent from inhalation (CEDE), and 4 day ground shine doses.
98. THYROID DOSE - radiation exposure to the thyroid resulting from an intake of radioactive materials.
99. TRANSMISSION POWER DISPATCHER - individual manning the transmission and distribution system for PPL Corporation.
100. UNPLANNED - a parameter change or an event that is not the result of an intended evolution and requires corrective or mitigate action.
101. VALID - an indication, report, or condition is considered to be VALID when it is verified by (1) an instrument channel check, or (2) indications on related redundant indicators, or (3) by direct observation by plant personnel, such that doubt related to the indicator's operability, the condition's existence, or the report's accuracy is removed. Implicit in this definition is the need for timely assessment.
102. VISIBLE DAMAGE - is damage to equipment or structure that is readily observable without measurements, testing, or analysis. Damage is sufficient to cause concern regarding the continued operability or reliability of affected safety structure, system, or component. Example damage includes: deformation due to heat or impact, denting, penetration, rupture, cracking, paint blistering. Surface blemishes (e.g., paint chipping, scratches) should not be included.
103. VITAL AREAS - is any area, normally within the PROTECTED AREA, which contains equipment, systems, components, or material, the failure, destruction, or release of which could directly or indirectly endanger the public health and safety by exposure to radiation. Plant VITAL AREAS include the following: SCC, Control Structure, Diesel Generator Buildings, ESSW Pump House, Spray Pond and Reactor Buildings.
104. WHOLE BODY EXPOSURE - direct radiation exposure to the body from external sources.

* Letter dated February 25, 2002 from Samuel J. Collins, Director, Office of Nuclear Reactor Regulations, to Robert G. Byram, Senior Vice President and Chief Nuclear Officer. Subject: Issuance of Order for Interim Safeguards and Security Compensatory Measures for - Susquehanna Steam Electric Station, Units 1 & 2.

2.0 ACRONYMS

2.1	ANS -	Alert Notification System
2.2	ARI -	Alternate Rod Insertion
2.3	ARM -	Area Radiation Monitors
2.4	ASCC -	Alternate Security Control Center
2.5	CAM -	Continuous Air Monitors
2.6	CCEMA -	Columbia County Emergency Management Agency
2.7	CEDE -	Committed Effective Dose Equivalent
2.8	CR -	Control Room
2.9	CREOASS -	Control Room Emergency Outside Air Supply System
2.10	CSAR	Certified Safety Analysis Report
2.11	CTN -	Centrex Telephone Network
2.12	DAC -	Derived Air Concentration
2.13	DCS -	Document Control Services
2.14	DEP/BRP -	Department of Environmental Protection/Bureau of Radiological Protection
2.15	DHS - FEMA	Department of Homeland Security – Federal Emergency Management Agency
2.16	DOE -	U.S. Department of Energy
2.17	EAL -	Emergency Action Levels
2.18	EAS -	Emergency Alert System
2.19	ECCS -	Emergency Core Cooling Systems
2.20	ED -	Emergency Director at Susquehanna SES
2.21	EDE -	Effective Dose Equivalent
2.22	EMA -	Emergency Management Agency
2.23	EMC -	Emergency Management Coordinator (Municipality)
2.24	EOC -	Emergency Operations Center
2.25	EOF -	Emergency Operations Facility
2.26	EP -	Emergency Preparedness
2.27	EPA -	Environmental Protection Agency
2.28	EP-PS -	Emergency Plan Position Specific Procedures
2.29	EPZ -	Emergency Planning Zone
2.30	ERDS -	Emergency Response Data System
2.31	ERF -	Emergency Response Facility
2.32	ERO	Emergency Response Organization for SSES
2.33	ETN -	Electronic Tandem Network
2.34	FPC -	Fuel Pool Cooling
2.35	FRC -	Federal Response Coordinator
2.36	FRERP -	Federal Radiological Emergency Response Plan
2.37	FRMAC -	Federal Radiological Monitoring and Assessment Center
2.38	FSAR -	Susquehanna SES Final Safety Analysis Report, Units 1 and 2
2.39	FTS -	Federal Telecommunications System
2.40	HHS -	Health and Human Services
2.41	HPCI -	High Pressure Coolant Injection System
2.42	JIC -	Joint Information Center
2.43	LCEMA -	Luzerne County Emergency Management Agency
2.44	LCO -	Limiting Condition for Operation
2.45	LER -	License Event Report

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2.46	LLRWHF -	Low Level Radwaste Holding Facility
2.47	LOCA -	Loss of Coolant Accident
2.48	MOCA -	Monitored Owner Controlled Area
2.49	MIDAS -	Meteorological Information and Dose Assessment System
2.50	MSIV -	Main Steam Isolation Valve
2.51	MSL -	Main Steam Line
2.52	NEP -	Nuclear Emergency Planning
2.53	NRC -	Nuclear Regulatory Commission
2.54	NRP -	National Response Plan
2.55	NSRB	Nuclear Safety Review Board
2.56	NSSS -	Nuclear Steam Supply System
2.57	ODCM -	Offsite Dose Calculation Manual
2.58	OSC -	Operations Support Center
2.59	PAGS -	Protective Action Guides from EPA
2.60	PASS -	Post Accident Sampling System
2.61	PEMA -	Pennsylvania Emergency Management Agency
2.62	PICSY -	Plant Integrated Computer System, synonymous with Plant Process Computer (PPC) or R*TIME
2.63	PORC -	Plant Operations Review Committee
2.64	PPL -	PPL Corporation
2.65	PSP -	Pennsylvania State Police
2.66	RCA -	Radiologically Controlled Area
2.67	RCIC -	Reactor Core Isolation Cooling
2.68	RDAS -	Remote Data Analysis System
2.69	RHR -	Residual Heat Removal
2.70	RPS -	Reactor Protection System
2.71	RMS	Remote Monitoring System
2.72	Rx -	Reactor
2.73	SCC -	Security Control Center
2.74	SDE -	Shallow Dose Equivalent
2.75	SDS -	Satellite Display System
2.76	SEIC -	Susquehanna Energy Information Center
2.77	SGTS -	Standby Gas Treatment System
2.78	SLC -	Standby Liquid Control
2.79	SOCA -	Security Owner Controlled Area
2.80	SPDS -	Safety Parameter Display System
2.81	SPINGs -	System Particulate, Iodine, and Noble Gas Monitor (Vent Monitoring System)
2.82	SSE -	Safe Shutdown Earthquake
2.83	SSES	Susquehanna Steam Electric Station
2.84	Susquehanna	Susquehanna Nuclear, LLC (subsidiary company of Talen Energy Corporation)
2.85	TEDE -	Total Effective Dose Equivalent
2.86	TR -	Temperature Recorder
2.87	TSC -	Technical Support Center
2.88	UMC -	Unit Monitoring Console (PCS)
2.89	UPS -	Uninterruptible Power Supply
2.90	USDA -	United States Department of Agriculture

3.0 REFERENCES

- 3.1 Columbia County Radiological Emergency Response Plan to Nuclear Power Plant Incidents.
- 3.2 DEP/BRP Emergency Plan - Bureau of Radiation Protection "Plan for Nuclear Power Generating Station Incidents".
- 3.3 NRC Generic Letter 91-14, "Emergency Telecommunications".
- 3.4 Luzerne County Radiological Emergency Response Plan to Nuclear Power Plant Incidents.
- 3.5 NUREG 0654/FEMA-REP-1 - Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness In Support of Nuclear Power Plants.
- 3.6 NUREG 0696 - Final Report - Functional Criteria for Emergency Response Facilities.
- 3.7 NUREG 0737 - Clarification of TMI Action Plan Requirements.
- 3.8 NUREG 1392 - Emergency Response Data System Implementation.
- 3.9 PEMA Emergency Plan - Annex E to Commonwealth of Pennsylvania "Disaster Operations Plan", Nuclear Incidents (Fixed Facility).
- 3.10 Susquehanna SES Emergency Plan Position Specific Procedures.
- 3.11 Susquehanna SES Letters of Agreement with off-site emergency organizations (Appendix A).
- 3.12 Susquehanna Nuclear, LLC Security Plan.
- 3.13 Susquehanna SES Plant Procedures.
- 3.14 10CFR Part 50 - Domestic Licensing of Production and Utilization Facilities.
- 3.15 Design of the Siren Alerting System for the Susquehanna Steam Electric Station: Final Report.
- 3.16 SSES Preparedness, Prevention and Contingency Plan.
- 3.17 EPA 400-R-91-001 - Manual of Protective Action Guides and Protective Actions for Nuclear Incidents.
- 3.18 NEI 99-01 Revision 4, "Methodology for Development of Emergency Action Levels".
- 3.19 NRC Letter dated April 17, 1996, MOVING THE EOF TO THE NORTHEAST DIVISION HEADQUARTERS (TAC NOS. M91377 AND M91378), Docket Nos. 50-387/50-412.

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- 3.20 Letter dated February 25, 2002 from Samuel J. Collins, Director, Office of Nuclear Reactor Regulations, to Robert G. Byram, Senior Vice President and Chief Nuclear Officer. Subject: Issuance of Order for Interim Safeguards and Security Compensatory Measures for – Susquehanna Steam Electric Station, Units 1 & 2.
- 3.21 Susquehanna Nuclear, LLC Training and Qualification Plan.
- 3.22 Regulatory Guide 1.101 Emergency Planning and Preparedness for Nuclear Power Reactors (Revision 3, August 1992).
- 3.23 NRC Bulletin 2005-02 Emergency Preparedness and Response Actions for Security Based Events July 18, 2005.
- 3.24 Regulatory Issue Summary 2004-15, Supplement 1, Emergency Preparedness Issues: Post-9/11.
- 3.25 EC 690275/AR 850156, Extended Power Uprate (EPU) Impact Evaluation.
- 3.26 NEI 03-12, Template for Security Plan and Training and Qualification Plan, June 2004.

4.0 SCOPE AND CONTENTS

SSES includes two boiling water reactor electrical generating units. The station is located in Salem Township, Luzerne County, in east central Pennsylvania; about five miles northeast of Berwick, Pennsylvania (see Figure 4.1). This Emergency Plan applies to the operation of Unit 1 and Unit 2.

4.1 SCOPE

This Plan provides guidance for both on-site and off-site emergency situations. It ranges in scope from relatively minor events and occurrences involving small releases of radioactive material, up to and including a major nuclear emergency having significant off-site radiological consequences. This Plan, together with the state, county, and municipal radiological emergency response plans, provides detailed guidance and direction for taking emergency measures by the ERO to ensure the health and safety of the public living within the 10-mile EPZ of SSES. Additional guidance is provided in state and county plans for ingestion pathway preventive measures out to 50 miles (see Figure 4.2).

Additional guidance on specific emergency actions for non-radiological releases of hazardous materials can be found in the SSES Preparedness, Prevention, and Contingency Plan.

4.2 CONTENTS

4.2.1 Classification

This Plan provides for a graded response for distinct classifications of emergency conditions, action within those classifications, and criteria for escalation to another classification. This classification system is also used by PEMA, DEP/BRP, LCEMA, and CCEMA. This system is covered in Section 5.0.

4.2.2 Organization Control

The Susquehanna organization for control of emergencies begins with the on-shift station personnel and contains provisions for augmentation and extension to include other station personnel, Talen corporate personnel, and outside emergency response organizations.

The total emergency program includes the support of state, federal and local emergency organizations. Detailed provisions are made for implementing protective measures against direct radiation exposure for the public within a radius of at least ten miles from the SSES. Additional preventive measures may be taken beyond that distance to preclude ingestion pathway exposures.

Specific agreements are also made with local off-site support organizations to provide firefighting, medical, law enforcement, and traffic control services.

State, County, and Federal agencies have lead responsibilities specifically related to this Plan.

Organizational control is covered in Section 6.0.

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4.2.3 Emergency Measures

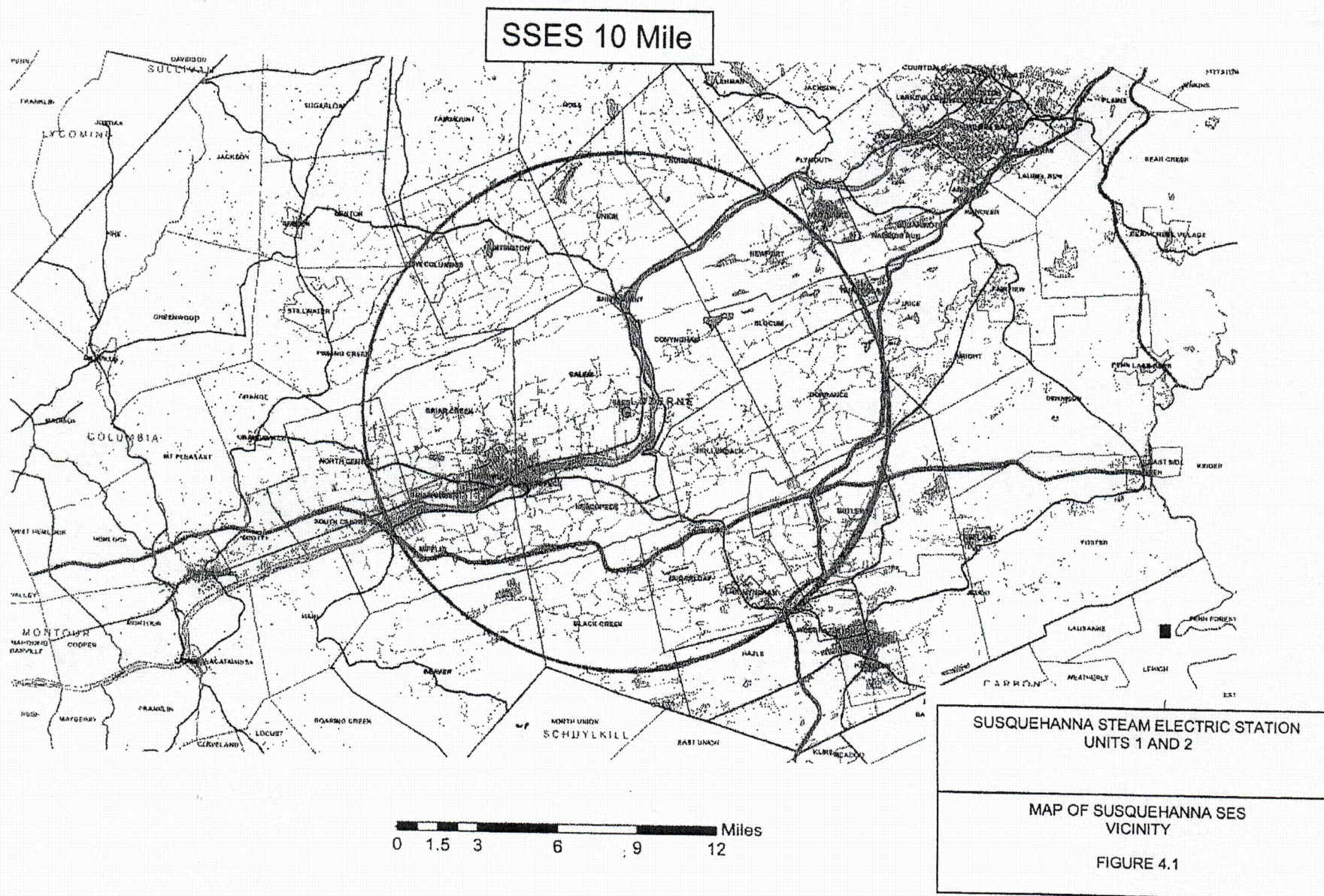
The mechanisms through which this Plan provides for the proper response to emergency conditions at SSES include identification of the event, initial and ongoing assessment, and initial and ongoing emergency actions. Emergency actions include classification of event, completion of notifications, activation of onsite and offsite ERO, requests for offsite assistance, implementing onsite protective actions, recommending offsite protective actions, and activation of the restoration organization. These mechanisms are discussed in Section 7.0.

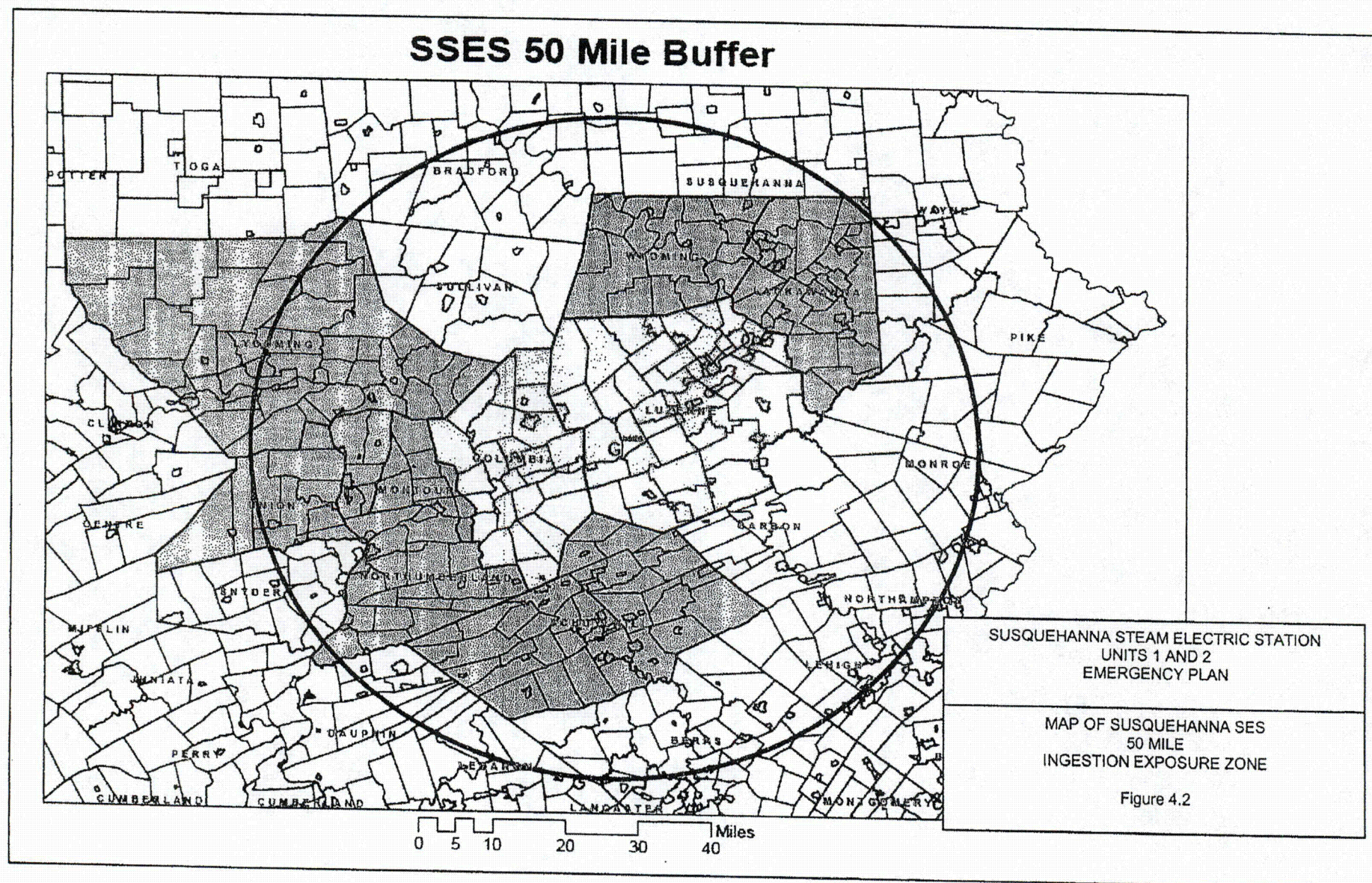
4.2.4 Emergency Facilities

Emergency facilities and equipment are provided to ensure the capabilities for prompt, efficient assessment and control of situations over the entire spectrum of probable and postulated emergency conditions. The facilities and associated equipment and their emergency functions are described in Section 8.0.

4.2.5 Emergency Training

A concept of in-depth preparedness is employed regarding the SSES emergency preparedness program. This concept is emphasized in the training program and in preparedness drills and exercises. Personnel are trained to provide an in-depth response capability for required actions in an emergency situation. Section 9.0 includes the means to achieve and maintain preparedness and to ensure maintenance of an effective emergency program.





5.0 EMERGENCY CONDITIONS

5.1 CLASSIFICATION SYSTEM

Emergency conditions are grouped into four classifications that cover the entire spectrum of probable and postulated accidents. These classifications are Notification of Unusual Event, Alert, Site Area Emergency, and General Emergency. Action level criteria are specified for determining and declaring each emergency classification. Planning is coordinated with State and county agencies to ensure that this classification system is compatible with the system used by those agencies. The system provides for notification of appropriate emergency response organizations and for implementation of actions immediately applicable to a specific condition. Provisions are included for upgrading the classification level and the corresponding response in the event of a change in the emergency condition.

Recognition and action level criteria are based on readily available information such as Control Room instrumentation. Immediate actions for response to conditions involving plant operating parameters, such as Technical Specification Limiting Conditions for Operation (LCOs), are detailed in the Plant Procedures.

The emergency classification system, initiating conditions, and EAL thresholds for each initiating condition are defined in Tables R, F, M, O, E and C. This table demonstrates how an initiating condition leads directly to the appropriate emergency classification based on the magnitude of the event. In many cases, the proper classification is immediately apparent from in-plant instrumentation. In other cases, more extensive assessment is necessary to determine the applicable emergency classification. Continuing reassessment is required to ensure that the classification is consistent with the conditions. The emergency actions that will be taken for each of the four emergency classifications are shown in Table 5.2.

5.1.1 Notification of Unusual Event

Events are in process or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.

Conditions that constitute a Notification of Unusual Event classification are outlined in Tables R, F, M, O, E and C.

The ED declares a Notification of Unusual Event within 15 minutes of having information necessary to make a declaration.

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The emergency actions that will be taken by Susquehanna and offsite agencies for an unusual event are listed in Table 5.2. In general the table states that the plant emergency management personnel and offsite agencies will be notified by plant staff if a Notification of Unusual Event is declared. Plant staff will request assistance as necessary to disseminate information, make critical decisions and resolve the unusual event.

5.1.2 Alert

Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of intentional malicious dedicated efforts of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.

Conditions that constitute an Alert classification are outlined in Tables R, F, M, O and C.

The ED or Recovery Manager declares an Alert within 15 minutes of having information necessary to make a declaration.

The emergency actions that will be taken by Susquehanna and offsite agencies for an Alert are listed in Table 5.2. In general the actions will be similar to a Notification of Unusual Event but will also include the dispatch of monitoring teams if a radioactive release is involved.

5.1.3 Site Area Emergency

Events are in process or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or HOSTILE ACTION that results in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) that prevent effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels that exceed EPA Protective Action Guideline exposure levels beyond the site boundary.

Conditions that constitute a Site Area Emergency are outlined in Tables R, F, M, O and C.

The ED or Recovery Manager declares a Site Area Emergency within 15 minutes of having information necessary to make a declaration.

The emergency actions taken by Susquehanna and offsite agencies for a Site Area Emergency are listed in Table 5.2. In general, the actions will be similar to the actions taken for an Alert with increased emphasis on information dissemination, more senior technical and management staff in the emergency response facilities, and additional field radiological monitoring.

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5.1.4 General Emergency

Events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.

Total activation of the onsite and offsite emergency organizations is required for such events. Actions involving offsite populations are probable. Conditions that constitute a General Emergency are outlined in Tables R, F, M, O and C.

The ED or Recovery Manager declares a General Emergency within 15 minutes of having information necessary to make a declaration.

The emergency actions taken by Susquehanna and offsite agencies for a General Emergency are listed in Table 5.2. In general the actions will be similar to the actions taken for a Site Area Emergency with additional resources dedicated to the health and safety of the general public. Additional actions include the initiation of predetermined protective actions for the public.

5.2 SPECTRUM OF POSTULATED ACCIDENTS

The classification and corresponding protective actions relative to significant emergency conditions are based primarily on the resultant or potential radiation doses. Methods are described in this Plan and in EP Procedures for measuring, projecting and evaluating those doses.

The discrete accidents addressed in this section are those which are defined in the SSES FSAR as "design basis accidents" resulting in off-site dose consequences and accidents involving the spent fuel storage facility (ISFSI). The following discussion of these postulated accidents and Tables R, F, M, O, E and C identify the instrumentation and other mechanisms for prompt detection and continued assessment, and demonstrates how each accident is encompassed within the emergency classification system of this Plan. When an event also involves elevated off-site radiological consequences or other specific conditions, the event classification will be adjusted to reflect actual conditions.

5.2.1 Control Rod Drop Accident

This accident is described in FSAR Section 15.4.9 and is postulated to occur with the reactor in hot startup condition, and very conservative calculations indicate failure of fuel rods. The main steam line radiation monitors detect the significant increase in activity and initiate an alarm to alert operations personnel. Operations personnel would then validate the alarm condition, manually SCRAM the reactor and initiate closure of the main steam isolation valves (MSIV) and isolation of the main condenser. During the MSIV closing time period, noble gases and radioiodines are transported with the steam to the condenser. Release of radioactivity to the environment is by way of leakage from the turbine building.

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Initial assessment of this accident, performed by the Control Room Personnel under the direction of the ED includes evaluation of radiation levels. Data are direct radiation levels at the locations of various turbine building ARMs, and an indication of the airborne radioactivity concentration from the turbine building vent exhaust monitor. EP-Procedures provide guidance for dose projections based on radiation readings. Data from the Turbine Building vent exhaust monitors is supplemented by information obtained by the radiological monitoring team.

The emergency actions include:

- a) Evaluate Emergency Action Levels per Tables R, F, M, O and C
- b) Declare the appropriate classification as warranted
- c) Implement Radiologically Controlled Area Evacuation

5.2.2

Fuel Handling

This accident is described in FSAR Section 15.7.4 and is postulated to occur with the reactor in shutdown condition with the vessel head removed and results in fuel failure. The reactor building ventilation exhaust duct radiation monitoring system alarms, isolates the ventilation system, and starts operation of the Standby Gas Treatment System (SGTS). Noble gases and radioiodines are released to the fuel pool, migrate to the secondary containment, and are released to the environment after filtration through the SGTS.

Initial assessment of this accident includes the performance of dose projections in accordance with EP-PSs. Dose projections utilize data from the reactor building vent monitor, standby gas treatment vent monitor, and meteorological instrumentation.

The emergency actions include:

- a) Evaluate Emergency Action Levels per Tables R, F, M, O and C
- b) Declare the appropriate classification as warranted
- c) Implement Radiologically Controlled Area Evacuation

5.2.3

Main Steam Line Break

This accident is described in FSAR Section 15.6.4 and is postulated to occur with the reactor in operating status. The steam line break occurs outside the containment and releases steam until complete closure of the MSIVs. Noble gases and radioiodines in the coolant are assumed to be released directly to the environment.

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The initial assessment of this event includes the performance of dose projections. An estimate of the resultant doses can be made and compared to those shown in Table 15.6-9 of the FSAR for worst case conditions. Actual doses are proportional to the fission product activity in the steam, as monitored by the off-gas release rate, prior to the accident. The doses in Table 15.6-9 of the FSAR are based on the assumption that the off-gas release rate is at the upper limiting condition for operation. Actual dose estimates, and corresponding emergency actions, may be taken, based on the off-gas release rate prior to the accident. Consideration may also be given to the relative benefit from taking or not taking specific protective action, based on the short-term duration of exposure associated with this accident.

The emergency actions include:

- a) Evaluate Emergency Action Levels per Tables R, F, M, O and C
- b) Declare the appropriate classification as warranted
- c) Implement Radiologically Controlled Area Evacuation

5.2.4

Instrument Line Break

This accident is described in the FSAR section 15.6.2 and is a circumferential rupture of an instrument line connected to the primary coolant system postulated to occur outside the primary containment but inside the secondary containment. This failure results in the release of primary system coolant to the secondary containment, until the reactor is depressurized. Operator recognition of the accident is by a combination of alarms or abnormal readings or by comparison of radiation, temperature, humidity, fluid and noise readings with several instruments monitoring the same process variable such as reactor level, jet pump flow, steam flow, and steam pressure.

Design Basis analysis shows that the event analyzed in Subsection 15.6.5 is bounding. The following describes a realistic analysis of the event. The iodine concentration prior to the break is assumed to be 0.2 micro-curies/gram dose equivalent I-131, which is the maximum equilibrium concentration for continued full-power operation permitted by the Technical Specifications. All of the iodine activity in the steam from the flashed liquid and steam from the steam dome and 10 percent from the remaining liquid released from the break are assumed to become airborne. A plateout factor of 2 is assumed for airborne iodine inside secondary containment. Although there will be some activation and corrosion products released the isotopes of primary importance are the iodine isotopes.

The emergency actions include:

- a) Evaluate Emergency Action Levels per Tables R, F, M, O and C

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- b) Declare the appropriate classification as warranted
- c) Implement Radiologically Controlled Area Evacuation

5.2.5

Loss of Coolant Accident (LOCA)

This accident is described in FSAR Section 15.6.5 and is postulated to involve a complete circumferential break of a recirculating loop pipe inside the primary containment, with the reactor operating at full power. The accident results in release of a significant quantity of fission products into the primary containment, leakage into the secondary containment, and release to the environment through the SGTS. Containment failure, although not likely, must be considered possible.

The occurrence of a design basis LOCA is uniquely identified by low-low reactor water level and high drywell pressure signals from the reactor protection system sensors and high radiation signal from the containment accident radiation monitor(s). A reactor scram and MSIV closure occur. Operation of the emergency core cooling system is initiated.

The radiological exposures resulting from the activity released to the environment as a consequence of the LOCA have been determined for the realistic and design basis cases. The design basis and realistic LOCA doses are presented in FSAR Table 15.6-18. The radiological exposure of the Control Room personnel for the design basis case is given in Table 15.6-21.

The emergency actions include:

- a) Evaluate Emergency Action Levels per Tables R, F, M, O and C
- b) Declare the appropriate classification as warranted
- c) Implement Radiologically Controlled Area Evacuation

5.2.6

Off-Gas Treatment System Failure

This accident is described in FSAR Section 15.7.1.1 and is postulated to be initiated by an occurrence such as earthquake (greater than design basis), explosion, or fire. The accident results in release of the stored inventory of radionuclides in the system including that contained in the charcoal adsorption beds. In addition to recognition of the initiating event, the operator is provided with recognition and assessment information from alarmed instrumentation such as ARMs and vent radiation monitors.

The emergency actions include:

- a) Evaluate Emergency Action Levels per Tables R, F, M, O and C
- b) Declare the appropriate classification as warranted
- c) Implement Radiologically Controlled Area Evacuation

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5.2.7 Air Ejector Line Failure

This accident is described in FSAR Section 15.7.1.3 and is postulated to result from a seismic event more serious than the system is designed to withstand. The noble gas and radioiodine activity from the air ejector, which is normally processed by the off-gas treatment system, is discharged to the environment via the turbine building ventilation system. The accident is recognized by the off-gas system loss of flow indication and ARMs. Assessment of the severity includes evaluation of the off-gas activity release rate prior to the accident and results of on-site monitoring.

The emergency actions include:

- a) Evaluate Emergency Action Levels per Tables R, F, M, O and C
- b) Declare the appropriate classification as warranted
- c) Implement Radiologically Controlled Area Evacuation

5.2.8 Liquid Radwaste Failure

This accident is described in FSAR Section 15.7.3 and is postulated to be a rupture of the RWCU phase separator in the Radwaste enclosure. Airborne radioactivity released during the accident passes directly to the environment via the turbine building vent. A high water level alarm on the Radwaste building sump alarms and activates the sump pumps. Radwaste building ARMs and on-site monitoring provides data for assessing the magnitude of the radiological consequences.

The emergency actions include:

- a) Evaluate Emergency Action Levels per Tables R, F, M, O and C
- b) Declare the appropriate classification as warranted
- c) Implement Radiologically Controlled Area Evacuation

5.2.9 Recirculation Pump Seizure

This accident is described in FSAR Section 15.3.3 and is postulated to result in the nearly instantaneous stoppage of the pump motor shaft of one of the recirculation pumps to occur with the reactor in operating status. As a result of the very rapid decrease in core flow in response to the large hydraulic resistance produced by the stopped pump impeller, a resulting level swell in the reactor may initiate a trip of the main and feedwater turbines, a scram due to stop valve closure, and a trip of the recirculation pumps.

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Fuel damage is not expected for the pump seizure accident for either two loop or single loop operation. Any rods that experience boiling transition may be conservatively postulated to fail and potentially causing an Emergency Plan entry per the fuel cladding degradation Emergency Action Level. The radioactivity released from the fuel is transported into the steam line and is released to the environment via leakage from the condenser.

The occurrence of recirculation pump seizure is identified by the indication of recirculation flow loss and pump differential pressure in the control room.

The emergency actions include:

- a) Evaluate Emergency Action Levels per Tables R, F, M, O and C
- b) Declare the appropriate classification as warranted

5.2.10

Feedwater Line Break – Outside Containment

This accident is described in FSAR Section 15.6.6 and is postulated to be an instantaneous, circumferential break of the largest feedwater line outside of containment. The break releases coolant to the turbine building until the feedwater line check valves isolate the reactor from the feedwater system. The reactor will scram on low water level. At low-low water level, RCIC and HPCI initiate and maintain reactor water level above the low-low-low level trip point and eventually restore the reactor water level to its normal elevation.

There is no fuel damage as a result of this accident scenario. Radioactivity will be released from the feedwater piping prior to isolation of the break location. Activity concentrations are the same as those found in the main condenser hotwell. Activity release will occur through flashing and partitioning into the turbine building atmosphere, and then to the environment through the turbine building ventilation system.

The estimated activity released to the environment for the worst case condition is shown in FSAR Table 15.6-25. Actual doses are proportional to the fission product activity in the coolant. Fission product activity can be determined from coolant grab samples or off-gas grab samples. Area Radiation Monitors, Main Steam Line Radiation Monitors, or Off-Gas radiation monitors may also indicate fission product activity.

The emergency actions include:

- a) Evaluate Emergency Action Levels per Tables R, F, M, O and C
- b) Declare the appropriate classification as warranted
- c) Implement Radiologically Controlled Area Evacuation.

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5.2.11 Accidents Affecting Independent Spent Fuel Storage Installation as described in the CSAR

The design basis accidents postulated to affect the Dry Fuel Storage System include:

- Reduced Horizontal Storage Module air inlet and outlet shielding
- Natural phenomena events as defined in the CSAR
- Accidental transfer cask drop with loss of neutron shield
- Lightning effects
- Debris blockage of Horizontal Storage Module air inlet and outlet opening
- Postulated Dry Cask Storage leakage
- Pressurization due to fuel cladding failure within the Dry Cask Storage

The consequences of the postulated accidents are as specified in the CSAR. Impact of the postulated accidents would be detected by radiological monitoring during transport and storage of spent fuel.

- a) Evaluate Emergency Action levels per Table E.
- b) Declaration of a Notification of Unusual Event as warranted.
- c) Implement recovery actions.

TABLE R – ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENT

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Category	GENERAL EMERGENCY	SITE AREA EMERGENCY	ALERT	NOTICE OF UNUSUAL EVENT
Radicalogical Effluents	<p>RG1</p> <p>IC Dose at the EMERGENCY PLAN BOUNDARY Resulting from an Actual or Imminent Release of Gaseous Radioactivity Exceeds 1000 mrem TEDE or 5000 mrem Child Thyroid CDE for the Actual or Projected Duration of the Release Using Actual Meteorology.</p> <p>Modes: ALL</p> <p><u>EAL Threshold Value</u> (1 or 2 or 3 or 4 or 5)</p> <p>Note: If dose assessment results are available at the time of declaration, the classification should be based on EAL 2 instead of EAL 1. While necessary declarations should not be delayed awaiting results, the dose assessment should be initiated / completed in order to determine if the classification should be subsequently escalated.</p> <ol style="list-style-type: none"> 1. VALID Noble Gas vent stack monitor reading(s) that exceeds or is expected to exceed a site total release rate of $6.2E+9 \mu\text{Ci}/\text{min}$ for 15 minutes or longer and Dose Projections are not available. <p><u>OR</u></p> <ol style="list-style-type: none"> 2. VALID dose assessment using actual meteorology indicates projected doses greater than 1000 mrem TEDE or 5000 mrem child thyroid CDE at or beyond the EPB. <p><u>OR</u></p> <ol style="list-style-type: none"> 3. A VALID reading sustained for 15 minutes or longer on the RMS perimeter radiation monitoring system greater than 1000 mR/hr. (The RMS perimeter radiation monitoring system is only monitored when the TSC or EOF is activated) <p><u>OR</u></p> <ol style="list-style-type: none"> 4. Field survey results indicate closed window dose rates exceeding 1000 mR/hr expected to continue for more than one hour at or beyond the EPB. <p><u>OR</u></p> <ol style="list-style-type: none"> 5. Analyses of field survey samples indicate child thyroid dose commitment at or beyond the EPB of 6000 mrem assuming one hour of inhalation. 	<p>RS1</p> <p>IC Dose at the EMERGENCY PLAN BOUNDARY Resulting from an Actual or Imminent Release of Gaseous Radioactivity Exceeds 100 mrem TEDE or 500 mrem Child Thyroid CDE for the Actual or Projected Duration of the Release.</p> <p>Modes: ALL</p> <p><u>EAL Threshold Value</u> (1 or 2 or 3 or 4 or 5)</p> <p>Note: If dose assessment results are available at the time of declaration, the classification should be based on EAL 2 instead of EAL 1. While necessary declarations should not be delayed awaiting results, the dose assessment should be initiated / completed in order to determine if the classification should be subsequently escalated.</p> <ol style="list-style-type: none"> 1. VALID Noble Gas vent stack monitor reading(s) that exceeds or is expected to exceed a site total release rate of $6.2E+8 \mu\text{Ci}/\text{min}$ for 15 minutes or longer and Dose Projections are not available. <p><u>OR</u></p> <ol style="list-style-type: none"> 2. VALID dose assessment using actual meteorology indicates projected doses greater than 100 mrem TEDE or 500 mrem child thyroid CDE at or beyond the EPB. <p><u>OR</u></p> <ol style="list-style-type: none"> 3. A VALID reading sustained for 15 minutes or longer on the RMS perimeter radiation monitoring system greater than 100 mR/hr. (The RMS perimeter radiation monitoring system is only monitored when the TSC or EOF is activated) <p><u>OR</u></p> <ol style="list-style-type: none"> 4. Field survey results indicate closed window dose rates exceeding 100 mR/hr expected to continue for more than one hour at or beyond the EPB. <p><u>OR</u></p> <ol style="list-style-type: none"> 5. Analyses of field survey samples indicate child thyroid dose commitment at or beyond the EPB of 500 mrem assuming one hour of inhalation. 	<p>RA1</p> <p>IC Any UNPLANNED Release of Gaseous or Liquid Radioactivity to the Environment that Exceeds 200 Times Technical Requirements Manual Limits for 15 Minutes or Longer.</p> <p>Modes: ALL</p> <p><u>EAL Threshold Value</u> (1 or 2 or 3 or 4)</p> <ol style="list-style-type: none"> 1. VALID Noble Gas vent stack monitoring reading(s) that exceeds a site total release rate of $2.0E+8 \mu\text{Ci}/\text{min}$ and that is sustained for 15 minutes or longer. <p><u>OR</u></p> <ol style="list-style-type: none"> 2. Confirmed sample analyses for airborne releases indicate total site release rates for 15 minutes or longer resulting in dose rates at the SITE BOUNDARY of: <ol style="list-style-type: none"> A. Noble gases $> 1.0E+5$ mrem/year whole body, <p><u>OR</u></p> <ol style="list-style-type: none"> B. Noble gases $> 6.0E+5$ mrem/year skin, <p><u>OR</u></p> <ol style="list-style-type: none"> C. I-131, I-133, H-3, and particulates with half-lives greater than 8 days $> 3.0E+5$ mrem/year to any organ (inhalation pathways only). <p><u>OR</u></p> <ol style="list-style-type: none"> 3. Confirmed sample analyses for liquid releases indicate concentrations in excess of 200 times the Technical Requirements Manual liquid effluent limits for 15 minutes or longer. <p><u>OR</u></p> <ol style="list-style-type: none"> 4. VALID reading on any liquid effluent monitor that exceeds two hundred times the alarm setpoint established by a current radioactivity discharge permit for 15 minutes or longer 	<p>RU1</p> <p>IC Any UNPLANNED Release of Gaseous or Liquid Radioactivity to the Environment that Exceeds Two Times the Technical Requirements Manual Limits for 60 Minutes or Longer.</p> <p>Modes: ALL</p> <p><u>EAL Threshold Value</u> (1 or 2 or 3 or 4)</p> <ol style="list-style-type: none"> 1. VALID Noble Gas vent stack monitor reading(s) that exceeds a total site release rate of $2.0E+6 \mu\text{Ci}/\text{min}$ and that is sustained for 60 minutes or longer. <p><u>OR</u></p> <ol style="list-style-type: none"> 2. Confirmed sample analyses for airborne releases indicate total site release rates, with a release duration of 60 minutes or longer, resulting in dose rates at the SITE BOUNDARY of: <ol style="list-style-type: none"> A. Noble gases > 1000 mrem/year whole body, <p><u>OR</u></p> <ol style="list-style-type: none"> B. Noble gases > 6000 mrem/year skin, <p><u>OR</u></p> <ol style="list-style-type: none"> C. I-131, I-133, H-3 and particulates with half-lives greater than 8 days > 3000 mrem/year to any organ (inhalation pathway only). <p><u>OR</u></p> <ol style="list-style-type: none"> 3. Confirmed sample analyses for liquid releases indicate concentrations with a release duration of 60 minutes or longer in excess of two times the Technical Requirements Manual liquid effluent limits. <p><u>OR</u></p> <ol style="list-style-type: none"> 4. VALID reading on any liquid effluent monitor that exceeds two times the alarm setpoint established by a current radioactivity discharge permit for 60 minutes or longer

TABLE R – ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENT

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Category	GENERAL EMERGENCY	SITE AREA EMERGENCY	ALERT	NOTICE OF UNUSUAL EVENT
Abnormal Radiation Levels			<p>RA2</p> <p>IC Release of Radioactive Material or Increases in Radiation Levels within the Facility that Impedes Operation of Systems Required to Maintain Safe Operations or to Establish or Maintain Cold Shutdown.</p> <p>Modes: ALL</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <ol style="list-style-type: none"> 1. VALID radiation reading > 15 mR/hr in the Main Control Room, the Radwaste Control Room or both the Security Control Center (SCC) and Alternate Security Control Center (ASCC). <p><u>OR</u></p> <ol style="list-style-type: none"> 2. VALID radiation monitor readings > 10 R/hr in areas requiring infrequent access to maintain plant safety functions (Table R-1). 	<p>RU2</p> <p>IC Unexpected increase in Plant Radiation.</p> <p>Modes: ALL</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <ol style="list-style-type: none"> 1. A. Uncontrolled water level decrease in the reactor refueling cavity, fuel transfer canal or spent fuel pool with all irradiated fuel assemblies remaining covered by water as indicated by any of the following on either unit: <ul style="list-style-type: none"> • Unexpected Fuel Pool Water Low Level alarm <u>OR</u> • Skimmer Surge Tank Low Level alarm <u>OR</u> • Visual observation of an uncontrolled water level drop below a fuel pool skimmer surge tank inlet, <u>OR</u> • Observation of water draining down the outside wall of Primary Containment. <p><u>AND</u></p> <p>B. UNPLANNED VALID Refuel Floor Area Radiation Monitor (Table R-2) readings greater than 500 mR/hr.</p> <p><u>OR</u></p> <ol style="list-style-type: none"> 2. UNPLANNED VALID Area Radiation Monitor readings increase by a factor of 1000 over normal* levels. <p>*Normal levels can be considered as the highest reading in the past twenty-four hours excluding the current peak value.</p>
Irradiated Fuel Accidents			<p>RA3</p> <p>IC Damage to Irradiated Fuel or Loss of Water Level that has or will result in the Uncovering of Irradiated Fuel Outside the Reactor Vessel.</p> <p>Modes: ALL</p> <p><u>EAL Threshold Value</u> (1 or 2 or 3)</p> <ol style="list-style-type: none"> 1. UNPLANNED VALID Refuel Floor Area Radiation Monitor (Table R-2) readings greater than 1 R/hr. <p><u>OR</u></p> <ol style="list-style-type: none"> 2. Water level < 22 feet above the RPV flange for the reactor refueling cavity that will result in irradiated fuel uncovering. <p><u>OR</u></p> <ol style="list-style-type: none"> 3. Water level < 22 feet above seated irradiated fuel for the spent fuel pool that will result in irradiated fuel uncovering. 	

Table R-1
Reactor Building Radiation Monitors

RB Area Elevation (ft)	ARM Number High Range	ARM Channel Description
749	52 54	RWCU Recirc Pp Access Fuel Pool Pump Area
719	50 51	CRD North CRD South
670	53	Remote Shutdown Room
645	48 57 55 56	HPCI PP Turbine Room RCIC PP Turbine Room RHR A C PP Room RHR B D PP Room

Table R-2
Refuel Floor Area Radiation Monitors

ARM Number	Description	Range (mR/hr)
14	Spent Fuel Pool Area	0.1 – 1000
47 (44 U-2)	Spent Fuel Pool Area	0.1 – 1000
49	Refuel Floor Area	$10^2 - 10^6$

TABLE F – FISSION PRODUCT BARRIER DEGRADATION

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Barrier		1. Fuel Clad Barrier				2. Reactor Coolant System Barrier								3. Primary Containment Barrier											
Parameter	Loss	Potential Loss				Loss				Potential Loss				Loss				Potential Loss							
a. Reactor Coolant Activity Level	1. Reactor Coolant activity > 300µCi/gm I-131 Dose Equivalent.	N/A				N/A				N/A				N/A				N/A							
b. RPV Level	1. RPV Level < -205".	1. RPV Level < -161".				1. RPV Level < -161".				N/A				N/A				1. Entry into EP-DS-002, "RPV and Primary Containment Flooding SAG-2"							
c. RCS Leak Rate or Containment Isolation Failure or Breach/Bypass	N/A	N/A				1. Unisolable Main Steamline break as indicated by the failure of both MSIVs in any one line to close. AND A. High MSL Flow AND High Steam Tunnel Temperature annunciators. OR B. Direct report of steam release.				1. Unisolable RCS Leakage > 50 gpm inside Primary Containmentment. OR 2. Unisolable primary system leakage outside Primary Containmentment as indicated by: A. Any Reactor Building area exceeds Max Normal Reactor Building Temperature Limit per Table F-1. OR B. Any Reactor Building area exceeds Max Normal Reactor Building Radiation Limit per Table F-2.				1. Failure of All automatic isolation valves in any one line penetrating Primary Containmentment to close AND a downstream pathway to the environment exists. OR 2. Intentional venting per EP-DS procedures OR EO procedures is performed. OR 3. Unisolable primary system leakage outside Primary Containmentment as indicated by: A. Any Reactor Building areas exceed Max Safe Reactor Building Temperature Limit per Table F-3. OR B. Any Reactor Building areas exceed Max Safe Reactor Building Radiation Limits per Table F-4.				N/A							
d. Drywell Pressure	N/A	N/A				1. Drywell Pressure ≥ 1.72 psig. AND Indication of a RCS leak inside drywell.				N/A				1. Rapid, unexplained decrease in Drywell Pressure following initial increase in pressure OR 2. Drywell Pressure response not consistent with LOCA conditions indicating a containment breach.				1. Drywell Pressure > 53 psig and increasing. OR 2. Drywell Hydrogen or Suppression Chamber Hydrogen > 6% AND Drywell Oxygen or Suppression Chamber Oxygen > 5%.							
e. Drywell Radiation	1. Containment High Range Rad Monitor reading > 3000 R/hr.	N/A				1. Containment High Range Rad Monitor reading > 7 R/hr. AND Indication of a RCS leak inside drywell				N/A				N/A				1. Containment High Range Rad Monitor reading > 40,000 R/hr.							
f. Emergency Director/Recovery Manager Judgment	1. Any condition in the judgment of the Emergency Director or Recovery Manager that Indicates Loss of the FUEL CLAD barrier.	1. Any condition in the judgment of the Emergency Director or Recovery Manager that Indicates Potential Loss of the FUEL CLAD barrier.				1. Any condition in the judgment of the Emergency Director or Recovery Manager that indicates Loss of the RCS barrier.				1. Any condition in the judgment of the Emergency Director or Recovery Manager that indicates Potential Loss of the RCS barrier.				1. Any condition in the judgment of the Emergency Director or Recovery Manager that indicates Loss of the PRIMARY CONTAINMENT barrier.				1. Any condition in the judgment of the Emergency Director or Recovery Manager that indicates Potential Loss of the PRIMARY CONTAINMENT barrier.							
Circle the X's in the table below for all applicable situations. Declare the EAL based upon all circled X's in any column.																									
Fission Product Barrier Status Table						FG1: General Emergency Loss Of ANY Two Barriers AND Loss OR Potential Loss Of Third Barrier.						FS1: Site Area Emergency Loss OR Potential Loss Of ANY Two Barriers.						FA1: Alert ANY Loss OR ANY Potential Loss Of EITHER Fuel Clad OR RCS.				FU1: Notification of Unusual Event ANY Loss OR ANY Potential Loss Of Primary Containment			
Modes: 1, 2, 3																									
Fuel Clad – LOSS						X	X		X		X	X		X	X				X						
Fuel Clad – POTENTIAL LOSS								X			X			X	X			X							
RCS – LOSS						X	X	X			X					X	X			X					
RCS – POTENTIAL LOSS									X	X							X	X				X			
Primary Containment – LOSS						X		X	X				X		X		X						X		
Primary Containment – POTENTIAL LOSS							X						X		X	X	X	X					X		

Table F-1
Max Normal Reactor Building Temperature Limit

RB Area Elevation (ft)	Area Temperature	Max Normal Temp (°F)
818	General Area	110
779	General Area	110
749	General Area	110
	RWCU-Pump Room	120
	RWCU-Heat Exch Room	120
	RWCU-Penetration Room	120
719	General Area	110
	Main Steam Line Tunnel	157
683	General Area	110
	HPCI Pipe Routing Area	120
	RCIC Pipe Routing Area	120
670	General Area	110
645	HPCI-Equip Area	120
	HPCI-Emerg Area Cooler	120
645	RCIC-Emerg Area Cooler	120
	RCIC-Equip Area	120
645	RHR Equip Area 1	110
645	RHR Equip Area 2	110
645	CS Pump Room A	110
645	CS Pump Room B	110
645	RB Sump Room	110

Table F-2
Max Normal Reactor Building Radiation Limit

RB Area Elevation (ft)	ARM Number	ARM Channel Description	Alarm Level
818	35	CASK STOR AREA	Hi Alarm
	14	SPENT FUEL CRIT MON	
	15	REFUEL FLOOR NORTH (SOUTH U-2)	
	42	REFUEL FLOOR WEST	
	47 (44 U-2)	SPENT FUEL CRIT MON	
749	8	RWCU Recirc PP Access	Hi Alarm
	10	Fuel Pool PP Area	
719	5	CRD North	Hi Alarm
	6	CRD South	
670	16	Remote Shutdown Room	Hi Alarm
645	3	HPCI PP & Turbine Room	Hi Alarm
	2	RCIC PP & Turbine Room	
	25	RHR A C PP Room	
	1	RHR B D PP Room	

Table F-3
Max Safe Reactor Building Temperature

RB Area Elevation (ft)	Area Temperature	Max Safe Temp (°F)
818	General Area	120
779	General Area	120
749	General Area RWCU-Pump Room RWCU-Heat Exch Room RWCU-Penetration Room	120 147 147 131
719	General Area Main Steam Line Tunnel	120 177
683	General Area HPCI Pipe Routing Area RCIC Pipe Routing Area	120 167 167
670	General Area	120
645	HPCI-Equip Area HPCI-Emerg Area Cooler	167 167
645	RCIC-Emerg Area Cooler RCIC-Equip Area	167 167
645	RHR Equip Area 1	142
645	RHR Equip Area 2	142
645	CS Pump Room A	142
645	CS Pump Room B	142
645	RB Sump Room	125

Table F-4
Max Safe Reactor Building Radiation Monitors

RB Area Elevation (ft)	ARM Number	ARM Channel Description	Max Safe Radiation Levels per EO-000-104 (R/HR)
818	49	Refuel Floor Area	10
749	52 54	RWCU Recirc PP Access Fuel Pool Pump Area	10
719	50 51	CRD North CRD South	10
670	53	Remote Shutdown Room	10
645	48 57 55 56	HPCI PP & Turbine Room RCIC PP & Turbine Room RHR A C PP Room RHR B D PP Room	10

TABLE M – SYSTEM MALFUNCTIONS

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For Information Only

Category	GENERAL EMERGENCY	SITE AREA EMERGENCY	ALERT	NOTICE OF UNUSUAL EVENT
Loss of AC Power	<p>MG1 IC Prolonged Loss of All Offsite Power and Prolonged Loss of All Onsite AC Power to Essential Busses.</p> <p>Modes: 1, 2, 3</p> <p><u>EAL Threshold Value</u></p> <p>1. Loss of power from Startup Transformer 10 <u>AND</u> 20 to either unit.</p> <p><u>AND</u></p> <p>All 4.16 kV ESS Busses on either unit are de-energized.</p> <p><u>AND</u></p> <p>A. Restoration of at least two 4.16 kV ESS Busses on each unit within 4 hours is not likely.</p> <p><u>OR</u></p> <p>B. RPV Water Level < -161".</p>	<p>MS1 IC Loss of All Offsite Power and Loss of All Onsite AC Power to Essential Busses.</p> <p>Modes: 1, 2, 3</p> <p><u>EAL Threshold Value</u></p> <p>1. Loss of power from Startup Transformer 10 <u>AND</u> 20 to either unit.</p> <p><u>AND</u></p> <p>All 4.16 kV ESS Busses on either unit are de-energized.</p> <p><u>AND</u></p> <p>Failure to restore power to at least two 4.16KV ESS busses on each unit within fifteen minutes from the time of loss of both offsite and ON SITE AC power.</p>	<p>MA1 IC AC Power Capability to Essential Busses Reduced to a Single Power Source for Greater than 15 Minutes such that Any Additional Single Failure Would Result In Station Blackout.</p> <p>Modes: 1, 2, 3</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <p>1. Loss of power from Startup Transformer 10 <u>AND</u> 20 to either unit for > 15 minutes.</p> <p><u>AND</u></p> <p>Onsite AC power is reduced to a single 4.16 kV ESS Bus on either unit.</p> <p><u>OR</u></p> <p>2. Loss of power from Startup Transformer 10 <u>OR</u> 20 to either unit for > 15 minutes.</p> <p><u>AND</u></p> <p>Onsite AC power is not available.</p>	<p>MU1 IC Loss of all Offsite Power to Essential Busses for Greater than 15 Minutes.</p> <p>Modes: 1, 2, 3</p> <p><u>EAL Threshold Value</u></p> <p>1. Loss of power from Startup Transformer 10 <u>AND</u> 20 to either unit for > 15 minutes.</p>
Loss of DC Power		<p>MS2 IC Loss of All Vital DC Power.</p> <p>Modes: 1, 2, 3</p> <p><u>EAL Threshold Value</u></p> <p>1. Loss of all vital DC power to either unit based on less than 105 volts on the 125 VDC main distribution busses 1D612 (2D612), 1D622 (2D622), 1D632 (2D632), <u>AND</u> 1D642 (2D642) for > 15 minutes.</p> <p>NOTE: Busses do not trip on undervoltage condition.</p>		
Failure of Reactor Protection System	<p>MG3 IC Failure of the Reactor Protection System to Complete an Automatic Scram and Manual Scram was NOT Successful and there is Indication of an Extreme Challenge to the Ability to Cool the Core.</p> <p>Modes: 1, 2</p> <p><u>EAL Threshold Value</u></p> <p>1. Indication(s) exist that indicate that Reactor Protection System setpoint was exceeded.</p> <p><u>AND</u></p> <p>RPS, ARI, and Manual Scram/ARI fail to initiate and complete a scram that reduces reactor power to < 5%.</p> <p><u>AND</u></p> <p>A. Reactor water level cannot be maintained > -205".</p> <p><u>OR</u></p> <p>B. The combination of RPV Pressure and Suppression Pool Temperature cannot be maintained below the HCTL curve, Figure M-1.</p>	<p>MS3 IC Failure of Reactor Protection System to Complete or Initiate an Automatic Reactor Scram once a Reactor Protection System Setpoint has been Exceeded and Manual Scram was NOT Successful.</p> <p>Modes: 1, 2</p> <p><u>EAL Threshold Value</u></p> <p>1. Indication(s) exist that indicate that Reactor Protection System setpoint was exceeded.</p> <p><u>AND</u></p> <p>RPS, ARI, and Manual Scram/ARI fail to initiate and complete a scram that reduces reactor power to < 5%.</p>	<p>MA3 IC Failure of Reactor Protection System to Complete or Initiate an Automatic Reactor Scram once a Reactor Protection System Setpoint has been Exceeded and Manual Scram was Successful.</p> <p>Modes: 1, 2</p> <p><u>EAL Threshold Value</u></p> <p>1. Indication(s) exist that indicate that Reactor Protection System setpoint was exceeded</p> <p><u>AND</u></p> <p>RPS automatic scram did not reduce reactor power to < 5%.</p> <p><u>AND</u></p> <p>A Manual Scram or ARI initiates and reduces reactor power to < 5%.</p>	

TABLE M – SYSTEM MALFUNCTIONS

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Category	GENERAL EMERGENCY	SITE AREA EMERGENCY	ALERT	NOTICE OF UNUSUAL EVENT
Decay Heat Removal		<p>MS4</p> <p>IC Complete Loss of Heat Removal Capability.</p> <p>Modes: 1, 2, 3</p> <p><u>EAL Threshold Value</u></p> <p>1. The combination of RPV Pressure and Suppression Pool Temperature cannot be maintained below the Heat Capacity Temperature Limit (HCTL) curve, Figure M-1.</p>		
Loss of Annunciators		<p>MS5</p> <p>IC Inability to Monitor a SIGNIFICANT TRANSIENT in Progress.</p> <p>Modes: 1, 2, 3</p> <p><u>EAL Threshold Value</u></p> <p>1. Loss of MOST or ALL of Safety System annunciators (Table M-3)</p> <p><u>AND</u></p> <p>2. Compensatory non-alarms indications are unavailable (Table M-3)</p> <p><u>AND</u></p> <p>3. <i>SPDS, PICSY and other compensatory non-alarms indications of Safety Functions (Table M-4) are not available</i></p> <p><u>AND</u></p> <p>4. A SIGNIFICANT TRANSIENT is in progress, (Table M-2).</p>	<p>MA5</p> <p>IC UNPLANNED Loss of Most or all Safety System Annunciation or Indication in Control Room With Either (1) a SIGNIFICANT TRANSIENT in Progress, or (2) Compensatory Non-Alarm Indicators are Unavailable.</p> <p>Modes: 1, 2, 3</p> <p><u>EAL Threshold Value</u></p> <p>1. 1. UNPLANNED loss of MOST or ALL of Safety System annunciators or indicators for greater than 15 minutes (Table M-3):</p> <p><u>AND</u></p> <ul style="list-style-type: none"> A SIGNIFICANT TRANSIENT is in progress. (Table M-2). <p><u>OR</u></p> <ul style="list-style-type: none"> SPDS, PICSY and other compensatory non-alarms indications are not available (Table M-4). 	<p>MU5</p> <p>IC UNPLANNED Loss of Most or all Safety System Annunciation or Indication in the Control Room for > 15 Minutes.</p> <p>Modes: 1, 2, 3</p> <p><u>EAL Threshold Value</u></p> <p>1. UNPLANNED loss of MOST or ALL of Safety System annunciators or indicators for greater than 15 minutes (Table M-3)</p>
Reactor Coolant System Leakage				<p>MU6</p> <p>IC Reactor Coolant System Leakage.</p> <p>Modes: 1, 2, 3</p> <p><u>EAL Threshold Value (1 or 2)</u></p> <p>1. Unidentified or pressure boundary leakage > 10 gpm.</p> <p><u>OR</u></p> <p>2. Identified leakage > 25 gpm.</p>
Fuel Clad Degradation				<p>MU7</p> <p>IC Fuel Cladding Degradation</p> <p>Modes: 1, 2, 3</p> <p><u>EAL Threshold Value (1 or 2)</u></p> <p>1. Reactor coolant activity, determined by sample analysis $\geq 4 \mu\text{Ci/gm}$ of I-131 Dose Equivalent.</p> <p><u>OR</u></p> <p>2. VALID Off-gas Pre-treatment Monitor high high radiation alarm</p>

SYSTEM NAME	ON SITE	OFF SITE
UHF Radio	X	
Commercial Telephone Systems		X
Loss of dedicated conference lines to offsite agencies		X
FTS-2001 (ENS)		X
Plant PA System	X	
Plant Cellular Telephone	X	
Teletcopy Transmittal		X
Sound Powered Phones	X	

SCRAM
Reactor Recirculation system Runback (>25% thermal power changes)
ECCS Initiations
UNPLANNED Thermal Power Changes >10 %
Load reject > 25% electrical load

ECCS
Containment Isolation
Reactor Trip
Process or Effluent Radiation Monitors
Electrical Distribution/Diesel Generators

Reactor Power-Nuclear Instrumentation Displays, Full Core Display, SIP panel displays
Decay Heat Removal-valve and pump indications for RHR, Core Spray, HPCI, RCIC, Suppression Pool level and Temperature
Containment Safety Functions-Pressure indication, Hydrogen/Oxygen concentrations, radiation levels,
Coolant System Integrity-RPV level, RPV pressure, Containment pressure, Containment Radiation level

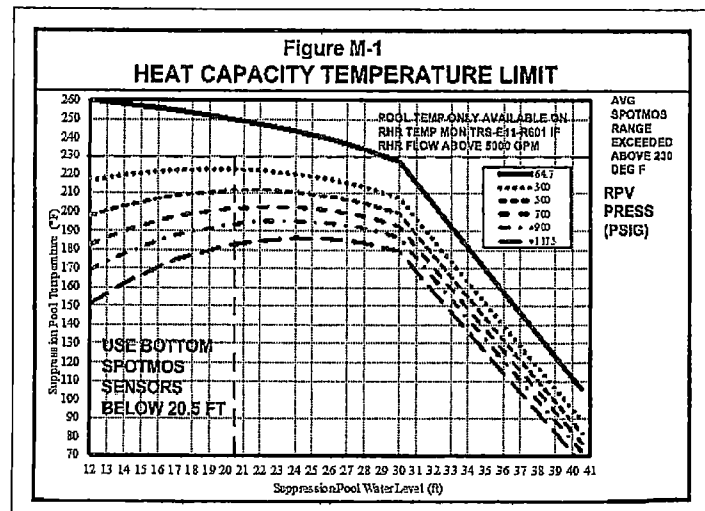


TABLE O – HAZARDS AND OTHER CONDITIONS

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For Information Only

Category	GENERAL EMERGENCY	SITE AREA EMERGENCY	ALERT	NOTICE OF UNUSUAL EVENT
Security Events	<p>OG1 IC Security Event Resulting in Loss of Physical Control of the Facility.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u></p> <p>A HOSTILE FORCE has taken control of plant equipment such that plant personnel are unable to operate equipment required to maintain safety functions as indicated by:</p> <ol style="list-style-type: none"> 1. Loss of physical control of a vital area such that operation of equipment required for safe shutdown is lost. <p><u>OR</u></p> <ol style="list-style-type: none"> 2. Loss of physical control of spent fuel pool cooling systems if imminent fuel damage is likely. (e.g., freshly off-loaded reactor core in the pool). 	<p>OS1 IC Confirmed Security Event in a plant VITAL AREA.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u></p> <p>Any act of SABOTAGE, HOSTAGE OR EXTORTION as confirmed by Security Supervision which results in actual or likely major failures of plant functions needed for protection of the public as judged by the Shift Manager / Emergency Director.</p>	<p>OA1 IC Confirmed Security Event in a PLANT PROTECTED AREA.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u></p> <p>Any act of SABOTAGE, HOSTAGE, EXTORTION OR CIVIL DISTURBANCE as confirmed by Security Supervision which results in an actual or potential substantial degradation of the level of safety of the plant as judged by the Shift Manager / Emergency Director.</p>	<p>OU1 IC Confirmed Security Condition or Threat which Indicates a Potential Degradation in the Level of Safety of the Plant.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u> (1 or 2 or 3)</p> <ol style="list-style-type: none"> 1. A SECURITY CONDITION that does NOT involve a HOSTILE ACTION as reported by the SECURITY SUPERVISION. <p><u>OR</u></p> <ol style="list-style-type: none"> 2. A credible site specific security threat notification. <p><u>OR</u></p> <ol style="list-style-type: none"> 3. A validated notification from NRC providing information of an aircraft threat.
Security Events		<p>OS2 IC Site Attack.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u></p> <p>A notification from the site security force that an armed attack, explosive attack, airliner impact, or other HOSTILE ACTION is occurring or has occurred within the PROTECTED AREA.</p>	<p>OA2 IC Notification of an Airborne Attack Threat.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u></p> <p>A validated notification from NRC of an airliner attack threat less than 30 minutes away.</p>	
Security Events			<p>OA3 IC Notification of <u>HOSTILE ACTION</u> within the OWNER CONTROLLED AREA.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u></p> <p>A notification from the site Security Force that an armed attack, explosive attack, airliner impact or other HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA.</p>	
Control Room Evacuation		<p>OS4 IC Control Room Evacuation has been Initiated and Plant Control Cannot be Established.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u> (1 and 2)</p> <ol style="list-style-type: none"> 1. Control room evacuation initiated. <p><u>AND</u></p> <ol style="list-style-type: none"> 2. Control of either unit per ON-100(200)-009 at the Remote Shutdown Panels not established within 15 minutes. 	<p>OA4 IC Control Room Evacuation has been Initiated.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u></p> <ol style="list-style-type: none"> 1. Control room evacuation initiated per ON-100(200)-009. 	

TABLE O – HAZARDS AND OTHER CONDITIONS

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For Information Only

Category	GENERAL EMERGENCY	SITE AREA EMERGENCY	ALERT	NOTICE OF UNUSUAL EVENT
Natural or Man-Made Events			<p>OA5 IC Natural and Destructive Phenomena Affecting the plant VITAL AREAS.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u> (1 or 2 or 3 or 4 or 5 or 6)</p> <ol style="list-style-type: none"> 1. Earthquake at greater than Operating Basis Earthquake (OBE) levels based on seismic instrumentation in the Control Room recording level greater than an Operating Basis Earthquake. <p><u>OR</u></p> <ol style="list-style-type: none"> 2. Tornado or SUSTAINED HIGH WINDS of greater than 80 mph within the PROTECTED AREA boundary resulting in VISIBLE DAMAGE to plant VITAL AREA, (Table O-1) OR Control Room Indication of degraded performance of the systems within those structures. <p><u>OR</u></p> <ol style="list-style-type: none"> 3. Vehicle crash within PROTECTED AREA boundary resulting in VISIBLE DAMAGE to plant VITAL AREAS, (Table O-1) OR Control Room Indication of degraded performance of the systems within those structures. <p><u>OR</u></p> <ol style="list-style-type: none"> 4. Turbine failure-generated missiles resulting in any VISIBLE DAMAGE to or penetration of any plant VITAL AREAS, (Table O-1). <p><u>OR</u></p> <ol style="list-style-type: none"> 5. Uncontrolled flooding in areas of the plant (Table O-1) that results in degraded safety system performance as indicated in the control room or that creates industrial safety hazards (e.g., electric shock) that precludes access necessary to operate or monitor safety equipment. <p><u>OR</u></p> <ol style="list-style-type: none"> 6. Report of any VISIBLE DAMAGE to plant VITAL AREAS (Table O-1) caused by other natural or destructive phenomena. 	<p>OU5 IC Natural and Destructive Phenomena Affecting the PROTECTED AREA.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u> (1 or 2 or 3 or 4 or 5 or 6)</p> <ol style="list-style-type: none"> 1. Earthquake detected by seismic instrumentation systems. <p><u>OR</u></p> <ol style="list-style-type: none"> 2. Tornado or SUSTAINED HIGH WINDS greater than 80 mph Impact ON SITE within the PROTECTED AREA. <p><u>OR</u></p> <ol style="list-style-type: none"> 3. Vehicle crash causing damage to plant structures or systems within PROTECTED AREA boundary. <p><u>OR</u></p> <ol style="list-style-type: none"> 4. Report by plant personnel of an unanticipated EXPLOSION within the PROTECTED AREA resulting in VISIBLE DAMAGE to permanent structures or equipment. <p><u>OR</u></p> <ol style="list-style-type: none"> 5. Report of turbine failure resulting in casing penetration or damage to turbine or generator seals. <p><u>OR</u></p> <ol style="list-style-type: none"> 6. Uncontrolled flooding in areas of the plant that has the potential to affect safety related equipment needed for the current operating mode (Table O-1).
FIRE / EXPLOSION			<p>OA6 IC FIRE or EXPLOSION Affecting the Operability of Plant Safety Systems Required to Establish or Maintain Safe Shutdown.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u></p> <p>FIRE or EXPLOSION in any of the following areas (Table O-1).</p> <p><u>AND</u></p> <p>Affected system parameter indications show degraded performance or plant personnel report VISIBLE DAMAGE to permanent structures or equipment within a vital area.</p>	<p>OU6 IC FIRE within PROTECTED AREA Boundary not Extinguished within 15 Minutes of Detection.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u></p> <p>FIRE in buildings or areas contiguous to any of the following areas not extinguished within 15 minutes of control room notification or verification of a control room alarm:</p> <ul style="list-style-type: none"> • Control Structure • Diesel Generator Buildings • ESSW Pump House • Radwaste Building • Reactor Buildings • Turbine Buildings • Interim Spent Fuel Storage Installation (ISFSI) • Security Control Center

TABLE O – HAZARDS AND OTHER CONDITIONS

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Category	GENERAL EMERGENCY	SITE AREA EMERGENCY	ALERT	NOTICE OF UNUSUAL EVENT
Toxic or Flammable Gases			<p>IC OA7 Release of Toxic or Flammable Gases within or Contiguous to a plant VITAL AREA which Jeopardizes Operation of Safety Systems Required to Establish or Maintain Safe Shutdown.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <ol style="list-style-type: none"> Report or detection of toxic gases within or contiguous to a plant VITAL AREA in concentrations that may result in an atmosphere IMMEDIATELY DANGEROUS TO LIFE AND HEALTH (IDLH). <p><u>OR</u></p> <ol style="list-style-type: none"> Report or detection of gases in concentrations greater than the LOWER FLAMMABILITY LIMIT within or contiguous to a plant VITAL AREA. 	<p>IC OU7 Release of Toxic or Flammable Gases Deemed Detrimental to NORMAL PLANT OPERATIONS.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <ol style="list-style-type: none"> Report or detection of Toxic or Flammable gases that have or could enter the SITE BOUNDARY in amounts that can affect NORMAL PLANT OPERATIONS. <p><u>OR</u></p> <ol style="list-style-type: none"> Report by Local, County or State Officials for evacuation or sheltering of site personnel based on an offsite event.
Discretionary	<p>IC OG8 Other Conditions Existing which in the Judgment of the Emergency Director / Recovery Manager Warrant Declaration of General Emergency.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u></p> <ol style="list-style-type: none"> Other conditions exist which in the judgment of the Emergency Director / Recovery Manager indicate that events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area. 	<p>IC OS8 Other Conditions Existing which in the Judgment of the Emergency Director / Recovery Manager Warrant Declaration of Site Area Emergency.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u></p> <ol style="list-style-type: none"> Other conditions exist which in the judgment of the Emergency Director / Recovery Manager indicate that events are in process or have occurred which involve actual or likely major failures of plant functions needed for protection of the public. Releases, if any, are not expected to result in exposure levels which exceed EPA Protective Action Guideline exposure levels beyond the SITE BOUNDARY. 	<p>IC OAS Other Conditions Existing which in the Judgment of the Emergency Director / Recovery Manager Warrant Declaration of an Alert.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u></p> <ol style="list-style-type: none"> Other conditions exist which in the judgment of the Emergency Director / Recovery Manager indicate that events are in process or have occurred which involve actual or likely potential substantial degradation of the level of safety of the plant. Releases, if any, are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels. 	<p>IC OU8 Other Conditions Existing which in the Judgment of the Emergency Director / Recovery Manager Warrant Declaration of an Unusual Event.</p> <p>Mode: ALL</p> <p><u>EAL Threshold Value</u></p> <ol style="list-style-type: none"> Other conditions exist which in the judgment of the Emergency Director / Recovery Manager indicate that events are in process or have occurred which indicate a potential degradation of the level of safety of the plant. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.

Table O-1 VITAL AREAS

- Reactor Buildings
- Control Structure
- Diesel Generator Buildings
- Spray Pond
- ESSW Pump House
- Security Control Center

TABLE E – ISFSI MALFUNCTIONS

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For Information Only

Category	GENERAL EMERGENCY	SITE AREA EMERGENCY	ALERT	NOTICE OF UNUSUAL EVENT
Dry Fuel Storage				<p style="text-align: right;">EU1</p> <p>IC Damage to a loaded cask CONFINEMENT BOUNDARY.</p> <p>Mode: N/A</p> <p><u>EAL Threshold Value</u> (1 or 2 or 3)</p> <p>1. From the point the cask is being lowered from the refuel floor, situations are occurring or have occurred during the transport of the irradiated spent fuel to the ON SITE storage facility, which jeopardize the integrity of the spent fuel or its container as indicated by:</p> <p style="padding-left: 40px;">Radiological readings exceed 2 R/hour one foot away from the external surface of any transfer cask.</p> <p><u>OR</u></p> <p>2. Situations are occurring or have occurred at the irradiated spent fuel storage facility, which jeopardize the integrity of the dry cask storage system as indicated by:</p> <p style="padding-left: 40px;">A. Radiological readings exceed 1 R/hour one foot away from the external surface of any horizontal storage module exclusive of the surface of the roof "bird" screen of the horizontal storage module.</p> <p><u>OR</u></p> <p style="padding-left: 40px;">B. Radiological readings exceed 4 R/hour one foot away from the external surface of the roof "bird" screen of the horizontal storage module.</p> <p><u>OR</u></p> <p>3. Any condition in the judgment of the Emergency Director / Recovery Manager that indicates loss of loaded fuel storage cask integrity.</p>

TABLE C – COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

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Category	GENERAL EMERGENCY	SITE AREA EMERGENCY	ALERT	NOTICE OF UNUSUAL EVENT
Loss of AC Power			<p>CA1 IC Loss of All Offsite Power and Loss of All ON SITE AC Power to Essential Busses.</p> <p>Modes: 4, 5, D</p> <p><u>EAL Threshold Value</u></p> <p>1. Loss of power from Startup Transformer 10 <u>AND</u> 20 to either unit.</p> <p><u>AND</u></p> <p>All 4.16 kV ESS Busses on either unit are de-energized.</p> <p><u>AND</u></p> <p>Failure to restore power to at least two 4.16KV ESS busses on each unit within fifteen minutes from the time of loss of both offsite and ON SITE AC power.</p>	<p>CU1 IC Loss of All Offsite Power to Essential Busses for Greater than 15 Minutes.</p> <p>Modes: 4, 5</p> <p><u>EAL Threshold Value</u></p> <p>1. Loss of power from Startup Transformer 10 <u>AND</u> 20 to either unit for > 15 minutes.</p>
Loss of DC Power				<p>CU2 IC UNPLANNED Loss of Required DC Power for Greater than 15 Minutes.</p> <p>Modes: 4, 5</p> <p><u>EAL Threshold Value</u></p> <p>1. UNPLANNED loss of all vital DC power to either unit based on less than 105 volts on the 125 VDC main distribution busses 1D612 (2D612), 1D622 (2D622), 1D632 (2D632), <u>AND</u> 1D642 (2D642)</p> <p><u>AND</u></p> <p>Failure to restore power to one required DC bus within 15 minutes from the time of loss.</p> <p>Note: Busses do not trip on undervoltage condition.</p>
Decay Heat Removal			<p>CA3 IC Inability to Maintain Plant in Cold Shutdown with Irradiated Fuel in the RPV.</p> <p>Modes: 4, 5</p> <p><u>EAL Threshold Value</u> (1 or 2 or 3)</p> <p>1. With Secondary Containment and RCS integrity¹ not established, an UNPLANNED event results in RCS temperature > 200°F.</p> <p><u>OR</u></p> <p>2. With Secondary Containment established and RCS integrity¹ not established, an UNPLANNED event results in RCS temperature > 200°F for > 20 minutes².</p> <p><u>OR</u></p> <p>3. An UNPLANNED event results in RCS temperature > 200°F for > 60 minutes² or results in an RCS pressure increase of greater than 20 psig.</p> <p>¹NOTE: By definition, in Mode 5 RCS integrity is not established.</p> <p>²NOTE: If an RCS heat removal system is in operation within this time frame and RCS temperature is being reduced then this EAL is not applicable.</p>	<p>CU3 IC UNPLANNED Loss of Decay Heat Removal Capability with Irradiated Fuel in the RPV.</p> <p>Modes: 4, 5</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <p>1. An UNPLANNED event results in RCS temperature > 200°F, the Technical Specification cold shutdown temperature limit.</p> <p><u>OR</u></p> <p>2. Loss of all RCS temperature and RPV level indication for > 15 minutes.</p>

TABLE C – COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

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Category	GENERAL EMERGENCY	SITE AREA EMERGENCY	ALERT	NOTICE OF UNUSUAL EVENT
RCS Leakage/RCS Drindown	<p>CG4</p> <p>IC Loss of RPV Inventory Affecting Fuel Clad Integrity with Containment Challenged with Irradiated Fuel in the RPV.</p> <p>Modes: 4, 5</p> <p><u>EAL Threshold Value</u> (1 and 2 and 3)</p> <p>1. Loss of RPV Inventory as indicated by unexplained Drywell or Reactor Building Sump or Drywell Equipment Drain Tank level increase, or Suppression Pool level increase, or other indications of loss of RPV inventory,</p> <p><u>AND</u></p> <p>2. RPV Level:</p> <p>A. < -161" (TAF) for > 30 minutes</p> <p><u>OR</u></p> <p>B. RPV level cannot be monitored concurrent with indication of core uncover for > 30 minutes as evidenced by one of the following:</p> <ul style="list-style-type: none"> Containment High Range Rad Monitor reading greater than or equal to 10R/hr, Erratic Source Range Monitor Indication Visual Indication. <p><u>AND</u></p> <p>3. Indication of Containment challenged as indicated by one or more of the following:</p> <ul style="list-style-type: none"> Drywell Pressure > 53 psig and increasing OR Drywell Hydrogen or Suppression Chamber Hydrogen > 6% AND Drywell Oxygen or Suppression Chamber Oxygen > 5% OR Secondary Containment not established OR Any Reactor Building area exceeds Max Safe Radiation Levels per Table C-1 	<p>CS4</p> <p>IC Loss of RPV Inventory Affecting Core Decay Heat Removal Capability.</p> <p>Mode: 4</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <p>1. With secondary Containment NOT established: (a or b)</p> <p>a. Loss of RPV Inventory as indicated by RPV level < - 135" (6" below the Low-Low Level ECCS actuation setpoint).</p> <p><u>OR</u></p> <p>b. RPV level cannot be monitored for > 30 minutes with a loss of RPV Inventory as indicated by:</p> <ul style="list-style-type: none"> Unexplained Drywell or Reactor Building Sump or Drywell Equipment Drain Tank level increase, or Unexplained Suppression Pool level increase, or Other unexplained indications of loss of RPV inventory <p><u>OR</u></p> <p>2. With secondary Containment established: (a or b)</p> <p>a. Loss of RPV Inventory as indicated by RPV level < - 161" (TAF)</p> <p><u>OR</u></p> <p>b. RPV level cannot be monitored for > 30 minutes with a loss of RPV Inventory as indicated by either:</p> <ul style="list-style-type: none"> Unexplained Drywell or Reactor Building Sump or Drywell Equipment Drain Tank level increase, or Unexplained Suppression Pool level increase, or Other unexplained indications of loss of RPV inventory Erratic Source Range Monitor Indication 	<p>CA4</p> <p>IC Loss of RCS Inventory.</p> <p>Mode: 4</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <p>1. Loss of RCS Inventory as indicated by RPV level < -129"</p> <p><u>OR</u></p> <p>2. Loss of RCS Inventory as indicated by unexplained Drywell or Reactor Building Sump or Drywell Equipment Drain Tank level increase, or Suppression Pool level increase, or other indications of loss of RPV inventory,</p> <p><u>AND</u></p> <p>RCS level cannot be monitored for > 15 minutes.</p>	<p>CU4</p> <p>IC RCS Leakage.</p> <p>Mode: 4</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <p>1. Unidentified or pressure boundary leakage > 10 gpm.</p> <p><u>OR</u></p> <p>2. Identified leakage > 25 gpm.</p>

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TABLE C – COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

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Category	GENERAL EMERGENCY	SITE AREA EMERGENCY	ALERT	NOTICE OF UNUSUAL EVENT
Loss of RPV Inventory		<p>CS5 IC Loss of RPV Inventory Affecting Core Decay Heat Removal Capability with Irradiated Fuel in the RPV.</p> <p>Mode: 5</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <p>1. With Secondary Containment NOT established (a or b)</p> <p>a. Loss of RPV inventory as indicated by RPV level < -135" (6" below the Low-Low Level ECCS actuation setpoint)</p> <p><u>OR</u></p> <p>b. RPV level cannot be monitored with indication of core uncover as evidenced by one or more of the following:</p> <ul style="list-style-type: none"> • Containment High Range Rad reading greater than or equal to 10R/hr. • Erratic Source Range Monitor Indication • Unexplained Drywell or Reactor Building Sump and Drywell Equipment Drain Tank level increase, or Suppression Pool level increase, or other indications of loss of RPV inventory <p><u>OR</u></p> <p>2. With Secondary Containment established (a or b)</p> <p>a. Loss of RPV inventory as indicated by RPV level < -161 (TAF)</p> <p><u>OR</u></p> <p>b. RPV level cannot be monitored with indication of core uncover as evidenced by one or more of the following:</p> <ul style="list-style-type: none"> • Containment High Range Rad reading greater than or equal to 10R/hr. • Erratic Source Range Monitor Indication • Unexplained Drywell or Reactor Building Sump and Drywell Equipment Drain Tank level increase, or Suppression Pool level increase, or other indications of loss of RPV inventory 	<p>CA5 IC Loss of RPV Inventory with Irradiated Fuel in the RPV.</p> <p>Mode: 5</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <p>1. Loss of RPV inventory as indicated by RPV level < -129".</p> <p><u>OR</u></p> <p>2. Loss of RPV inventory as indicated by unexplained Drywell or Reactor Building Sump or Drywell Equipment Drain Tank level increase, or Suppression Pool level increase, or other indications of loss of RPV inventory,</p> <p><u>AND</u></p> <p>RPV level cannot be monitored for > 15 minutes.</p>	<p>CU5 IC UNPLANNED Loss of RCS Inventory with Irradiated Fuel in the RPV.</p> <p>Mode: 5</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <p>1. UNPLANNED RCS level decrease below the RPV flange for greater than or equal to 15 minutes,</p> <p><u>OR</u></p> <p>2. Loss of RPV inventory as indicated by unexplained Drywell or Reactor Building Sump or Drywell Equipment Drain Tank level increase, or Suppression Pool level increase, or other indications of loss of RPV inventory,</p> <p><u>AND</u></p> <p>RPV level cannot be monitored.</p>

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TABLE C – COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

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For Information Only

Category	GENERAL EMERGENCY	SITE AREA EMERGENCY	ALERT	NOTICE OF UNUSUAL EVENT
Fuel Clad Degradation				<p>CU6 IC Fuel Clad Degradation.</p> <p>Modes: 4, 5</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <p><u>OR</u></p> <p>1. UNPLANNED Increase in the following radiation monitor readings:</p> <ul style="list-style-type: none"> • Refuel Floor radiation Monitor > 750 m/hr • Refuel Platform ARM > 750 m/hr • Refuel Floor Continuous Air Monitor > 300 DAC <p><u>OR</u></p> <p>2. Reactor coolant activity, determined by sample analysis $\geq 4 \mu\text{Ci/gm}$ of I-131 dose equivalent.</p>
Loss of Communications				<p>CU7 IC UNPLANNED Loss of all ON SITE or Offsite Communications Capabilities.</p> <p>Modes: 4, 5</p> <p><u>EAL Threshold Value</u> (1 or 2)</p> <p>1. UNPLANNED loss of all ON SITE communications capability per Table C-2 affecting the ability to perform routine operations.</p> <p><u>OR</u></p> <p>2. UNPLANNED loss of all offsite communications capability per Table C-2.</p>
Inadvertent Criticality				<p>CU8 IC Inadvertent Criticality.</p> <p>Modes: 4, 5</p> <p><u>EAL Threshold Value</u></p> <p>1. An UNPLANNED extended positive period observed on nuclear instrumentation.</p>

TABLE C – COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTIONS

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Table C-1

Reactor Building Radiation Monitors

RB Area Elevation (ft)	ARM Number High Range	ARM Channel Description	Max Safe Radiation Levels Per EO-000-104 (R/HR)
818	49	Refuel Floor Area	10
749	52	RWCU Recirc PP	10
	54	Fuel Pool PP Area	
719	50	CRD North	10
	51	CRD South	
670	53	Remote Shutdown Room	10
645	48	HPCI PP & Turbine Room	10
	57	RCIC PP & Turbine Room	
	55	RHR A C PP Room	
	56	RHR B D PP Room	

Table C-2

ON SITE/Offsite Communications Capability

SYSTEM	ON SITE	OFF SITE
UHF Radio	X	
Commercial telephone systems	X	X
Loss of dedicated conference lines to the offsite agencies		X
FTS-2001 (ENS)		X
Plant PA System	X	
Plant cellular telephones	X	
Telecopy Transmittal		X
Sound powered phones	X	

TABLE 5.2

EMERGENCY ACTIONS BASED ON CLASSIFICATION

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Classification	Licensee Actions	Off-Site Agency Actions
<p>1. Notification of Unusual Event</p> <p>Class Description</p> <p>Events are in process or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.</p> <p>Purpose</p> <p>Purpose of offsite notification is to (1) assure that the first step in any response later found to be necessary has been carried out, (2) bring the operating staff to a state of readiness, and (3) provide systematic handling of unusual events information and decision-making.</p>	<p>1. Promptly notify plant emergency management personnel of event particulars and an assessment of safety significance of the event.</p> <p>and</p> <p>2. Notify PEMA, LCEMA, CCEMA and NRC of "Unusual Event".</p> <p>Under certain security-related events, such as a site-specific credible threat, the TSC and EOF will be activated at the Unusual Event level.*</p> <p>and</p> <p>3. Closeout event with verbal summary to offsite authorities (PEMA, LCEMA, CCEMA, and NRC) followed by written summary if required by 10 CFR 50.73.</p> <p>or</p> <p>4. Escalate to higher emergency classification if appropriate.</p>	<p>1. Notify key officials and public if deemed necessary by county/state Emergency Director.</p> <p>and</p> <p>2. Provide assistance if requested and able.</p>

* Letter dated February 25, 2002 from Samuel J. Collins, Director, Office of Nuclear Reactor Regulations, to Robert G. Byram, Senior Vice President and Chief Nuclear Officer. Subject: Issuance of Order for Interim Safeguards and Security Compensatory Measures for – Susquehanna Steam Electric Station, Units 1 & 2.

TABLE 5.2

EMERGENCY ACTIONS BASED ON CLASSIFICATION

Page 2 of 7

Classification	Licensee Actions	Off-Site Agency Actions
<p>2. Alert</p> <p>Class Description</p> <p>Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.</p> <p>Purpose</p> <p>Purpose of offsite alert is to (1) assure that emergency personnel are readily available to respond if situation becomes more serious or to perform confirmatory radiation monitoring if required, and (2) provide offsite authorities current status information.</p>	<p>1. Promptly notify state/local authorities and NRC of Alert status and reason for alert.</p> <p>and</p> <p>2. Promptly notify Susquehanna emergency management personnel of event particulars and an assessment of the safety significance of the event.</p> <p>and</p> <p>3. Activate TSC and OSC, and dispatch monitoring team if radioactive effluent release involved.</p> <p>and</p> <p>4. Provide a dedicated individual for plant status updates to offsite authorities and periodic press briefings.</p> <p>and</p> <p>5. Activate the Emergency Response Data System (ERDS) within one hour.</p> <p>and</p>	<p>1. Provide assistance, if requested and able.</p> <p>and</p> <p>2. Augment resources by activating EOC and any other primary response centers.</p> <p>and</p> <p>3. Alert to Standby status key emergency personnel including monitoring teams and associated communications.</p> <p>and</p> <p>4. Prepare to provide confirmatory off-site radiation monitoring and ingestion pathway dose projections if actual releases substantially exceed technical specification limits.</p> <p>and</p> <p>5. Maintain alert status until verbal closeout.</p> <p>or</p> <p>6. Escalate to a more severe class.</p>

TABLE 5.2

EMERGENCY ACTIONS BASED ON CLASSIFICATION

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Classification	Licensee Actions	Off-Site Agency Actions
2. Alert (continued)	6. Closeout or recommend reduction in emergency class by verbal summary to offsite authorities followed by written summary if required by 10 CFR 50.73. or 7. Escalate to a more severe emergency class.	

TABLE 5.2

EMERGENCY ACTIONS BASED ON CLASSIFICATION

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Classification	Licensee Actions	Off-Site Agency Actions
<p>3. Site Area Emergency</p> <p>Class Description</p> <p>Events are in process or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or HOSTILE ACTION that results in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) that prevent effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels that exceed EPA Protective Action Guideline exposure levels beyond the site boundary.</p> <p>Purpose</p> <p>Purpose of the site area emergency declaration is to (1) assure that response centers are manned, (2) assure that monitoring teams are dispatched, (3) assure that personnel required for evacuation of near-site areas are at duty stations if situation becomes more serious, (4) provide consultation with offsite authorities, and (5) provide updates for the public through offsite authorities.</p>	<p>1. Promptly inform off-site authorities of site emergency status and reason for emergency, if known.</p> <p>and</p> <p>2. Augment resources by activating TSC, OSC and EOF and near-site/off-site monitoring teams.</p> <p>and</p> <p>3. Dispatch monitoring teams and associated communications for instances where radiation releases appear imminent or have occurred.</p> <p>and</p> <p>4. Provide a dedicated individual for plant status updates to off-site authorities and periodic press briefings.</p> <p>and</p> <p>5. Make senior technical and management staff in the EOF available for consultation with NRC and state on a periodic basis.</p> <p>and</p>	<p>1. Provide, if able, any assistance required.</p> <p>and</p> <p>2. Augment resources by activating primary emergency response centers.</p> <p>and</p> <p>3. Assure that systems for public notification of emergency status are in standby and initiate preparation for subsequent public periodic updates.</p> <p>and</p> <p>4. Alert to standby status other emergency personnel and dispatch personnel to duty stations.</p> <p>and</p> <p>5. Provide off-site monitoring results to licensee and others and jointly assess them.</p> <p>and</p>

TABLE 5.2

EMERGENCY ACTIONS BASED ON CLASSIFICATION

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Classification	Licensee Actions	Off-Site Agency Actions
3. Site Area Emergency (Continued)	<p>6. Provide meteorological and dose estimates to off-site authorities for actual releases via a dedicated individual or automated data transmission.</p> <p>and</p> <p>7. Provide release and dose projections based on available plant condition information and foreseeable contingencies.</p> <p>and</p> <p>8. Close out or recommend reduction in emergency class by briefing of off-site authorities at EOF by phone followed by written summary if required by 10 CFR 50.73.</p> <p>or</p> <p>9. Escalate to General Emergency class.</p>	<p>6. Continuously assess information from licensee and off-site monitoring with regard to changes to protective actions already initiated for public and mobilizing evacuation resources.</p> <p>and</p> <p>7. Recommend placing milk animals within affected area radius on stored feed and assess need to extend distance.</p> <p>and</p> <p>8. Provide press briefings.</p> <p>and</p> <p>9. Maintain site emergency status until close out or reduction of emergency class.</p> <p>or</p> <p>10. Escalate to General Emergency class.</p>

TABLE 5.2

EMERGENCY ACTIONS BASED ON CLASSIFICATION

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Classification	Licensee Actions	Off-Site Agency Actions
<p>4. General Emergency</p> <p>Class Description</p> <p>Events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.</p> <p>Purpose</p> <p>Purpose of the general emergency declaration is to (1) initiate predetermined protective actions for the public, (2) provide continuous assessment of information from licensee and offsite organization measurements, (3) initiate additional measures as indicated by actual or potential releases, (4) provide consultation with offsite authorities and (5) provide updates for the public through offsite authorities.</p>	<p>1. Same as for "Site Area Emergency" classification.</p> <p>and</p> <p>2. Make a Protective Action Recommendation to the state based on an assessment of plant conditions and/or dose projections.</p> <p>Note: The initial recommendations may be modified on the basis of subsequent plant status assessments or dose projections.</p>	<p>1. Provide requested assistance, if able.</p> <p>and</p> <p>2. Recommend protective actions for 10-mile EPZ population and 50 mile EPZ agricultural products.</p> <p>and</p> <p>3. Dispatch key emergency personnel including monitoring teams and associated communications.</p> <p>and</p> <p>4. Activate other emergency services personnel and dispatch to duty stations.</p> <p>and</p> <p>5. Provide off-site monitoring results to Susquehanna and jointly assess these.</p> <p>and</p> <p>6. Continuously assess information from licensee and field-monitoring teams with regard to changes to protective actions already initiated for public and evacuation resources.</p> <p>and</p>

TABLE 5.2		
EMERGENCY ACTIONS BASED ON CLASSIFICATION		
Page 7 of 7		
Classification	Licensee Actions	Off-Site Agency Actions
4. General Emergency (Continued)		7. Maintain General Emergency status until closeout or reduction of emergency classification.

6.0 ORGANIZATIONAL CONTROL OF EMERGENCIES

Susquehanna's Emergency Plan is based upon a four-phase approach to accident response and mitigation.

Phase I - Immediate Response (Reference Table 6.1.) Phase I consists of identification of the emergency condition, initiation of prompt corrective action and initiation of prompt notification to local, state and federal agencies as well as appropriate members of Susquehanna's ERO. This initial phase is implemented by the on-shift organization. The on-shift organization has been staffed and trained to be capable of both safely operating the units and quickly and effectively responding to an emergency condition. Initially, the Shift Manager, the highest ranking management individual on-shift, will assume the role of Emergency Director and retain that role until relieved of that responsibility by the on-call Emergency Director.

The Shift Manager, as Emergency Director:

- a) Classifies the condition.
- b) Initiates corrective actions and coordinates emergency management activities.
- c) Designates a communicator to notify off-site agencies and initiate call-in of selected personnel.
- d) Ensures plant personnel are notified via the PA system or direct manual methods for accountability and/or evacuation, if required.
- e) Notifies the on-call Emergency Director, informs him of the situation, and requests relief if appropriate. For conditions under a Notification of Unusual Event the Shift Manager may remain as ED through termination of the condition, due to probable short duration or low severity of the event.
- f) Ensures that on-site emergency response individuals and groups are notified, using the PA system or direct manual communications. Depending on the nature and severity of the condition, TSC, OSC and EOF staffing may be called out. Under certain security-related events, such as a site-specific credible threat, the TSC and EOF will be activated at the Notification of Unusual Event level.*
- g) Ensures that initial dose projections are done and makes resulting recommendations regarding off-site protective actions, if required.
- h) Ensures that off-duty station personnel are notified to assist as necessary with emergency activities. These notifications are made, via the activation of ERO response pagers or by telephone backup, to individuals designated for off-duty availability status (i.e. on-call) to fill key emergency response positions. Those key positions are identified in Sections 6.2 and 6.3. Other off-duty personnel are called in as required.

* Letter dated February 25, 2002 from Samuel J. Collins, Director, Office of Nuclear Reactor Regulations, to Robert G. Byram, Senior Vice President and Chief Nuclear Officer. Subject: Issuance of Order for Interim Safeguards and Security Compensatory Measures for – Susquehanna Steam Electric Station, Units 1 & 2.

Upon activation of Phase II, additional personnel are available, and control of the emergency and dissemination of in-plant teams shifts from the Control Room to the TSC.

Phase II - Activation of On-Site ERO - (Reference Table 6.1 and Figures 6.2 and 6.3.) Upon notification by the on-shift organization, the on-call Emergency Director reports to the site/Control Room to assume the role of Emergency Director. As specified in Figures 6.2 and 6.3, the minimum number of support coordinators and staffs also report to the site. These individuals form the nucleus of the ED's Team and activate the TSC and OSC. The TSC and OSC are fully functional within 60 minutes of event classification. As the on-call Emergency Director and his support coordinators arrive, they are briefed and assume responsibility for their particular areas of expertise. Emergency management activities, including communications, are under the control of the Emergency Director; dose projection and assessment activities are directed by the Radiation Protection Coordinator; technical expertise is directed by the Tech Support Coordinator; the Operations Coordinator oversees Operations activities; and the Damage Control Team Coordinator oversees in-plant damage control actions. The OSC Coordinator supports the operations and damage control team coordinators by managing personnel in the OSC (back up OSC in the event the OSC is not habitable). The TSC takes over all emergency management and support activities from the on-shift organization, freeing them to devote their efforts towards establishing and maintaining the plant in a safe, stable condition.

The onsite ERO may be further augmented as shown in Figures 6.2 and 6.3 by personnel filling TSC positions and OSC positions not designated as minimum requirements. Figures 6.2 and 6.3 also designate minimum requirements for the TSC and OSC respectively.

In the event of hazards preventing site access or certain security related events, personnel who normally report to the Technical Support Center and Operations Support Center will report to the Alternate TSC and OSC at the Emergency Operations Facility. OSC personnel can be sent to the site to mitigate site damage as soon as the site is secured. The alternate TSC will be activated as soon as possible to support the site; however, it is recognized that the activation time for the alternate TSC may exceed 60 minutes.

Phase III - Activation of Off-site ERO - (Reference Table 6.1 and Figure 6.4.) This organization staffs the Emergency Operations Facility to provide management of the overall emergency response as well as technical support, off-site radiological assessment, and communications.

Staffing of the EOF occurs following an Alert, a Site Area Emergency, or a General Emergency declaration. The EOF is required to activate following a Site Area Emergency or General Emergency classification and take over management of the emergency from the TSC or Control Room within 90 minutes of the Site Area Emergency or higher classification. Activation of the Emergency Operations Facility requires the minimum staff as identified in Figure 6.4. When the initial emergency classification is a Site Area Emergency or higher, the EOF will take over the management of the emergency within 90 minutes of the declaration of a Site Area Emergency. Due to the site response during a daytime security event that starts at the SAE level, the EOF may not be staffed within 90 minutes. With an event in progress, station personnel may be directed to take cover and therefore be unable to respond to the EOF until cleared by plant security. At the discretion of the Emergency Director, the EOF can be activated and take over management of the emergency earlier.

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Functional operation will include:

- Management of overall emergency response
- Coordination of radiological and environmental assessment
- Determination of recommended protective actions
- Communications
- Coordination of emergency response activities with Federal, State, local county and municipal agencies

The offsite ERO may be further augmented as denoted in Figure 6.4 by personnel filling EOF positions not designated as minimum requirements. Figure 6.4 designates minimum staffing.

Phase IV - Restoration - This phase leads ultimately to the return to service of the unit. The organizational and philosophical concepts that are utilized during this phase are highly dependent upon the nature of the emergency. The restoration phase does not begin until there is complete assurance that the plant is in a stable shutdown condition and that there is no inadvertent or unplanned significant release of radioactivity to the environment.

6.1 NORMAL OPERATING ORGANIZATION

FSAR Section 13.1.2 defines the normal operating organization for SSES as illustrated in FSAR Figure 13.1-3. Minimum shift response during off-hours is as follows:

- 1 Shift Manager (SRO)
- 1 Unit Supervisor (SRO)
- 3 Plant Control Operators (RO)
- 4 Non-Licensed Operators
- 1 Shift Technical Advisor
- 2 Health Physics Technicians
- 1 Chemistry Technician
- 1 Emergency Plan Communicator
- 1 NRC Communicator
- Fire Brigade response personnel per Technical Requirements Manual
- Security Personnel as specified in the SSES Security Plan

NOTE: On-shift staffing may be less than the minimum Emergency Plan requirement for a period of time not to exceed 2 hours in order to accommodate unexpected unavailability of on-duty shift individuals provided immediate action is taken to restore shift complement to within minimum requirements. This note applies to personnel who are on-duty, not oncoming shift relief.

6.2 ON-SITE EMERGENCY ORGANIZATION-(PHASE II)

Technical Specification 5.2, FSAR Section 13.1, and FSAR Section 17.2 define qualification requirements for Susquehanna Nuclear, LLC personnel. Department implementing procedures define specific qualification and training requirements for Susquehanna ERO positions.

6.2.1 Emergency Director

The Shift Manager assumes the role of Emergency Director (ED) until he is relieved by a qualified Emergency Director or a qualified Recovery Manager (RM).

Non-delegable duties (duties the ED cannot delegate except to another qualified ED or RM) are duties related to classification of emergencies, decision to notify state and local agencies, and Protective Action Recommendations.

The ED assumes full responsibility for the implementation and administration of the Emergency Plan and is responsible for assuring continuity of resources until those responsibilities are turned over to the Recovery Manager. The responsibility and authority of the ED are set forth in Appendix E of this plan.

The ED cannot relinquish any responsibilities until the arrival of and assumption of responsibilities by the Recovery Manager at the EOF. At that time, the ED may relinquish any responsibilities except those related to maintaining the Unit in a safe shutdown condition with adequate core cooling and no uncontrolled radioactive material releases.

If the Emergency Director cannot perform this function during the emergency, he will be succeeded by the Operations Coordinator until another qualified Emergency Director arrives to assume this responsibility.

Functional responsibilities of the ED include:

- a. Immediately upon notification of an existing or potential emergency, report to the Control Room and initiate assessment activities, including classification of the emergency and dose projections if appropriate.
- b. Manage overall implementation of the immediate on-site corrective and protective actions to bring the incident under control and mitigate its effects.

- c. Assure that appropriate notifications of emergency classification and protective action recommendations to state and local agencies are made within 15 minutes of declaration of an EAL.
- d. Assure that appropriate notifications and recommendations to the NRC are made immediately after notification to state and local agencies, but not later than one hour after declaration of an emergency classification.
- e. Augment the on-site ERO with duty roster personnel and other available station staff members as dictated by the emergency condition.
- f. Continue reassessment of emergency status and make appropriate recommendations including protective actions to off-site organizations.
- g. Ensure that information released is accurate and released through the proper channels.
- h. Activate Emergency Facilities described in Section 8.0, as required.
- i. Assign a technical liaison to the state EOC when requested.
- j. Communicate with and provide information to the Recovery Manager and the Public Information Manager.
- k. Authorize issuance of Radioprotective Drugs in accordance with prescribed procedures. This should include consultation with the Radiation Protection Coordinator and medical consultants.
- l. Authorize Emergency dose extensions. This should include consultation with the Radiation Protection Coordinator.
- m. Authorize taking essential corrective action that may involve the risk of emergency radiation exposure to ERO personnel. Table 7.2 provides the basic criteria for this decision.
- n. Implement RCA and site evacuations as required.
- o. Request Federal assistance to augment ERO capabilities as necessary. Such requests should be coordinated with PEMA and/or DEP/BRP and are normally done through the Recovery Manager and the EOF staff.

6.2.2 Operations Coordinator

Responsibilities:

- a. Prepare the TSC for activation if the TSC ED has relieved the Control Room ED of responsibility.

- b. Advise the Shift Manager in directing the Control Room and in-plant operational activities.
- c. Direct activities of the Damage Control Team Coordinator, SAM Coordinator, and TSC Communicator.
- d. Advise the ED on plant operations and conditions.
- e. Establish and set priorities for mitigation with the concurrence of the ED.

6.2.3 TSC Communicator

Responsibilities:

- a. Make proper notification to off-site organizations.
- b. Initiate call-in procedures as requested by the ED.
- c. Function as liaison for emergency-related communications between the ED and on-site and off-site emergency groups.
- d. Maintain communications with the NRC.
- e. Maintain records during the emergency.

6.2.4 Radiation Protection Coordinator

Responsibilities:

- a. Ensures dose projections are performed until relieved by the EOF.
- b. Provide radiological advice to the ED concerning on-site emergency activities.
- c. Provide protective action recommendations to the ED.
- d. Maintain communication with and provide information to the EOF Dose Assessment Supervisor.
- e. Maintain communication with and provide radiological information to DEP/BRP until relieved by the EOF.
- f. Provide on-site radiation monitoring personnel for effluent release assessment.
- g. Provide radiation monitoring personnel for emergency team efforts.
- h. Direct personnel and area contamination control and decontamination activities.
- i. Provide dose projections to the Dose Assessment Supervisor until relieved of that responsibility by the EOF.

- j. Perform initial off-site environmental assessment until relieved by the EOF.
- k. Ensure radiological data is communicated to the NRC via the Health Physics Network.
- l. Advise the Emergency Director and organization on use of KI and emergency dose extensions.

6.2.5 Technical Support Coordinator

Responsibilities:

- a. Analyze mechanical, electrical, and instrument and control problems; determine alternate solutions, design and coordinate the installation of short-term modifications.
- b. Analyze thermo hydraulic and thermodynamic problems and develop solutions.
- c. Assist in the development of procedures necessary for conducting emergency operations and damage control.
- d. Analyze conditions and develop guidance for the ED and operations personnel.
- e. Resolve questions concerning Operating License requirements with NRC representatives.
- f. Maintain lead technical responsibility, coordinate technical information with the EOF as appropriate, and request technical support from the EOF or other engineering/technical resources.
- g. Maintain communication with and provide technical information to DEP/BRP Technical, as required, until relieved by the EOF.
- h. Provide core damage estimates.
- i. Until relieved, provide direction to Chemistry Technician to perform emergency plan actions.

6.2.6 Security Coordinator

Responsibilities:

- a. Maintain plant security and institute appropriate contingency measures.
- b. Account for personnel as directed by EP-PS procedures.
- c. Act as liaison with outside groups in providing additional resources such as manpower, equipment, supplies, and transportation.

- d. Coordinate provisions for transportation, food, and other logistical support for emergency personnel.
- e. Provide personnel and work schedules for relieving emergency personnel.

6.2.7 OSC Coordinator

Responsibilities:

- a. Report to the OSC.
- b. Organize, brief, dispatch, and direct, as necessary, the onsite damage control teams.
- c. Coordinate the availability and assignment of personnel supporting activities for the ED and other ERO managers.
- d. Organize and manage emergency response personnel in the OSC.

6.2.8 Damage Control Team Coordinator

Responsibilities:

- a. Participate in briefings with the TSC ED and helping to set priorities.
- b. Ensure damage control resources are allocated on the correct priorities by providing priorities to the OSC Coordinator and monitoring INDIA Team assignments.
- c. Communicate with Operations Coordinator, the Technical Support Coordinator, and the OSC Coordinator.

6.2.9 Radio Communicator

Responsibilities:

- a. Maintain radio communications with all in-plant teams.
- b. Maintain an up-to-date status of in-plant radiological conditions.

6.2.10 Severe Accident Management (SAM) Coordinator

Responsibilities:

- a. Make recommendations to the Operations Coordinator for mitigation of the effects of a severe accident at SSES.

6.2.11 HP Specialist

Responsibilities:

- a. Determine radiological conditions in the plant.

- b. Assess on-site habitability.
- c. Provide guidance and brief teams on radiological and ALARA considerations.
- d. Monitor in-plant team exposures.

6.2.12 Non-Operations Support Personnel

Maintenance Technicians, Chemistry Technicians, and HP trained personnel are called out per Table 6.1 to support damage control, chemistry, and radiological functions. Table 6.1 designates personnel who report in 60 minutes and 90 minutes.

6.2.13 Engineering Staff (Core Thermal Hydraulic Engineer, Electrical Engineer, Mechanical Engineer)

Responsibilities

- a. Provide core damage estimates. (Core Thermal Hydraulic Engineer)
- b. Analyze mechanical problems and other discipline related issues and determine solutions and provide support for implementation of required mechanical actions. (Mechanical Engineer)
- c. Analyze electrical and instrumentation and control problems and other discipline related issues. Determine alternate solutions and provide support for implementation of required electrical/I&C actions. (Electrical Engineer)

All responders are notified to provide for full augmentation of resources at the TSC and OSC for the positions in Figures 6.2 and 6.3. The augmented response may be greater than 60 minutes and may occur after the TSC has activated.

6.3 OFF-SITE RESOURCES AND ACTIVITIES (PHASE III)

Technical Specification 5.3, FSAR Section 13.1, and FSAR Section 17.2 define the qualification requirements for Susquehanna Nuclear, LLC personnel. Department implementing procedures define specific qualification and training requirements for Susquehanna ERO positions.

Notification of the Recovery Manager is made via notification of key managers for the Notification of Unusual Event and via ERO activation for higher levels by the Communicators in the Control Room or TSC. An on-call duty roster is available in the Susquehanna Information Management System.

At the discretion of the Emergency Director, the EOF can be manned or activated at a Notification of Unusual Event level.

Staffing of the EOF occurs following an Alert, a Site Area Emergency, or a General Emergency declaration. The EOF is required to activate following a Site Area Emergency or General Emergency classification for the purpose of taking over management of the emergency from the TSC or Control Room within 90 minutes of the Site Area Emergency or higher classification.

When these responders are briefed on the emergency situation and verify that necessary equipment is functioning properly, the Recovery Manager will assume responsibility for overall management of the emergency response. The following functions are provided:

- Management of overall emergency response
- Coordination of radiological and environmental assessment
- Determination of recommended protective actions
- Communications
- Coordination of emergency response activities with Federal, State, local county and municipal agencies.

All responders are notified to provide for full augmentation of resources at the EOF for the positions in Figure 6.4. The augmented response may be greater than ninety minutes and may occur after the EOF has activated.

6.3.1 EOF Organization

6.3.1.1 Recovery Manager

If the Recovery Manager cannot perform this function during the emergency, he will be succeeded by the Engineering Support Supervisor until another qualified Recovery Manager arrives.

Non-delegable duties (duties the RM cannot delegate except to another qualified ED or RM) are duties related to classification of emergencies, decision to notify state and local agencies, and Protective Action Recommendations.

Responsibilities:

- a. Upon activation of the EOF, initiate assessment activities, including classification of the emergency and dose projections if appropriate.
- b. Provide continuous coordination and evaluation of Susquehanna activities during an emergency having or potentially having environmental consequences.
- c. Manage overall Susquehanna emergency response and assuring continuity of resources.
- d. Act as lead interface with off-site government agency officials.

- e. Assure appropriate notifications and recommendations to offsite organizations are timely.
- f. Continue reassessment of emergency status and make appropriate recommendations including protective actions to off-site organizations.
- g. Ensure that information released is accurate and made through proper channels.
- h. Direct the activities of all other EOF managers.
- i. Request Federal assistance to augment ERO capabilities as necessary. Such requests should be coordinated with PEMA and/or DEP/BRP.
- j. Notify PEMA Emergency Operations Center of Protective Action Recommendations.
- k. When requested, send a representative to the State EOC. If conditions result in implementation of the Federal Radiological Emergency Response Plan, assign a representative to the Federal Response Center, to the Federal Radiological Monitoring and Assessment Center, and to the Joint Information Center (most likely the PIM).
- l. Authorize issuance of Radioprotective Drugs in accordance with prescribed procedures. This should include consultation with the Dose Assessment Supervisor and medical consultants.

6.3.1.2 Engineering Support Supervisor

Responsibilities:

- a. Manage engineering support resources in the EOF.
- b. Provide technical support to aid in decision making process.
- c. Keep BRP informed concerning technical status of the plant and any mitigating actions being considered or in progress.
- d. Provide technical information concerning plant status and mitigating actions to the off-site agencies.

6.3.1.3 EOF Support Supervisor

Responsibilities:

- a. Provide support to the Recovery Manager in review of plant data.
- b. Oversee formal communications leaving the EOF.
- c. Oversee proper facility set up.
- d. Provide administrative support.
- e. Support the Recovery Manager with off-site agency interface.

6.3.1.4 Dose Assessment Supervisor

Responsibilities:

- a. Ensure dose projections are performed.
- b. Evaluate the magnitude and effects of actual or potential radioactive releases from the plant.
- c. Recommend appropriate off-site protective measures to the Recovery Manager.
- d. Recommend appropriate emergency classifications to the Recovery Manager.
- e. Communicate with the Radiation Protection Coordinator in the TSC and with DEP/BRP radiological personnel.
- f. Control field monitoring teams.
- g. Perform off-site environmental assessment.

6.3.1.5 EOF Communicator

Responsibilities:

- a. Assume responsibility from the TSC for off-site notifications (except ENS communications).
- b. Transmit information about the emergency to off-site organizations.
- c. Function as liaison for questions received from other organizations.
- d. Maintain a record of emergency notifications.

6.3.1.6 Radiological Support Staff (Dose Assessment Staffer, Field Team Director, Radiological Monitoring Team)

Responsibilities:

- a. Perform dose calculations, as required. (Dose Assessment Staffer)
- b. Monitor and control field teams. (Field Team Director)
- c. Perform monitoring of areas around the plant as directed. (Radiological Monitoring Team)

6.3.2 Joint Information Center

The ED ensures that the JIC (Figure 6.4) is promptly notified and provided with available details of the emergency. The JIC staff provides information regarding the emergency and items of public interest to municipal groups, initiates appropriate news releases, and responds to questions from the media officials. After the Recovery Manager assumes control of the EOF, the Public Information Manager reports to the Recovery Manager.

6.3.2.1 Public Information Manager

Responsibilities:

- a. Serve as official company spokesperson.
- b. Prepare and disseminate SSES information to the public via the news media.
- c. Interpret plant status information for the news media and other agencies.
- d. Arrange for news media conferences.
- e. Manage rumor control.
- f. Establish interfaces and coordinates news releases with the federal and state agencies in the JIC.

6.3.3 Local Off-Site Support Services

The Emergency Director, and the Recovery Manager as appropriate, ensures that appropriate off-site emergency support groups are contacted to provide the type and level of assistance that may be necessary to deal with the existing emergency condition. Organizations that may be contacted for assistance during an emergency condition at SSES are listed in Appendix A, Letters of Agreement. Methods available for contacting these support groups include direct telephone communications with individual organizations, use of the 911 telephone system for emergency services, and message relay through LCEMA or CCEMA.

6.3.4 Off-Site Support Services

An emergency at SSES may require additional technical services and equipment. This type of assistance may be obtained from the organizations listed in Table 6.2 and Appendix A.

6.4 COORDINATION WITH PARTICIPATING GOVERNMENT AGENCIES

The ED and the RM ensure that off-site authorities are notified and apprised of emergency events at SSES when their respective facilities are managing the emergency.

Notification of a NOUE (Notification of Unusual Event) is primarily to ensure that the authorities are cognizant of the details of events that may arouse public concern and initiate inquiries by news media or members of the public.

6.4.1 County Agencies

LCEMA and CCEMA provide for:

- Planning and coordination with municipal, State, and Federal authorities.
- Initial response to notification by SSES.
- Alert and warning of local populations within the 10 mile EPZ.
- Evacuation and other protective measures for local populations within the 10 mile EPZ.
- Emergency services.
- Situation analysis.
- Operation of county EOC.

LCEMA and CCEMA also provide direction for the local organizations that are assigned action or support responsibilities under their plans.

The primary method of notification to LCEMA and CCEMA is via the Centrex Telephone Network (CTN). Secondary methods are radio and regular telephone.

6.4.2 State Agencies

PEMA provides for:

- Issuance of planning guidance.
- Coordination of State response to nuclear incidents.
- Coordination of multi-county Emergency Response Planning.
- Operation of PEMA EOC.

- Provision for emergency public information.
- Coordination of State agencies and departments.

DEP/BRP provides for:

- Technical consultation on Radiological and Plant conditions.
- Accident assessment.
- Recommendations for protective actions.
- Recommendations for protection of potable water and food.
- Recommendations for recovery and re-entry (off-site).
- Operation of DEP/BRP EOC.

Initially, SSES notifies PEMA, who, in turn, notifies DEP/BRP. DEP/BRP calls back to SSES to obtain radiological and plant condition information and establish a communication link with SSES. If the emergency warrants, DEP/BRP responds to the EOF.

The primary method of notification to PEMA is via the Centrex Telephone Network (CTN). CTN communications between SSES and DEP/BRP are used for transmitting radiological and technical information/recommendations.

6.4.3 Federal Agencies

As detailed in the Federal Radiological Emergency Response Plan (FRERP), the Federal government maintains extensive capabilities to assist states and licensees in responding to radiological emergencies. The ED and, upon EOF activation, the RM are authorized to request Federal assistance. Such requests should be coordinated with PEMA and/or DEP/BRP.

NRC - designated Lead Federal Agency (LFA) under the National Response Plan (NRP).

The primary method of notification to the NRC is via the Emergency Notification System (ENS). Upon notification of an emergency classification, the NRC will enter one of several response modes based on the severity of the event. Response modes include:

Normal (Increased Regional Monitoring)
Monitoring
Activation
Expanded Activation

In the Normal and Monitoring modes, NRC site presence is provided by the Resident Inspectors who typically observe activity in the Control Room and TSC. Upon Activation, a site team will be dispatched that can arrive at the site within several hours. Response assignments are primarily at the EOF, with a few individuals located at the JIC, TSC, Control Room and OSC. If conditions warrant, the NRC can go to Expanded Activation that has a much larger response to staff shift type operations and additional team support personnel.

DOE - provides radiological monitoring and assessment assistance.

The primary method of notification to DOE is by telephone, although assistance is typically requested through the Lead Federal Agency (NRC) or through the State (DEP/BRP). Initial DOE response is by a Radiological Assistance Program (RAP) team dispatched from the DOE Brookhaven Area Office. This team can arrive within eight hours and would operate primarily out of the EOF.

If the situation necessitates additional technical assistance, DOE can set up and staff a Federal Radiological Monitoring and Assessment Center (FRMAC) in the vicinity of SSES. A FRMAC, which draws DOE resources and personnel from its Nevada Operations Office, can be operational within about 24 hours. The location of such a center would be selected based on actual radiological deposition patterns. The Federal FRMAC team is initially managed by DOE, with personnel also provided by NRC, EPA, USDA, HHS, and other agencies. The State and Susquehanna would assign personnel to the FRMAC to coordinate monitoring activity.

DHS – FEMA - responsible for coordinating all Non-technical Federal response.

If the emergency situation has warranted implementation of the National Response Plan (NRP), DHS-FEMA will set up and staff a Federal Response Center in the vicinity of SSES. The location of such a center would be selected based on current needs and conditions. Access to all Federal non-technical assistance is through the Federal Response Center where representatives of participating agencies are based.

Other Federal Agencies

In addition to NRC, DOE, and DHS-FEMA, other Federal agencies are available to provide assistance under the National Response Plan (NRP). The extent of participation depends on the nature and magnitude of the event. A full listing of these agencies and description of their missions is found in the National Response Plan (NRP).

Additional information on available resources can be found in NUREG-1442/ FEMA-REP-17, "Post-Emergency Response Resources Guide."

Joint Information Center (JIC)

The National Response Plan (NRP) provides for each participating agency to be represented at a Joint Information Center, along with the State and the facility licensee. For Susquehanna SES, it is expected that these parties will agree to utilize Susquehanna's JIC to fulfill this on-scene Joint Information Center role.

Resources Available to Support Federal Response

- A. Lodging and Food Service - Lodging and food service for personnel operating from the FRMAC, Federal Response Center, and JIC are available from local commercial resources in the Wilkes-Barre, Hazleton, and Bloomsburg areas.
- B. Communications - Capability provided by DOE and DHS-FEMA, supplemented by standard telephone service to be established when facilities are selected, are adequate for the FRMAC and Federal Response Center.
- C. Security - Security arrangements for the FRMAC and Federal Response Center can be made by the DOE and DHS-FEMA, respectively, with local resources.
- D. Transportation - Federal response personnel will provide their own transportation by renting commercially available vehicles.
- E. Airport - Wilkes-Barre/Scranton International Airport, Avoca, Pennsylvania.

6.5 RESTORATION

The Susquehanna ERO continues to provide appropriate emergency response functions until such time as the emergency has been terminated or the Talen Corporate Leadership Council (CLC) has approved the implementation of a long-range restoration organization. Termination from an emergency condition is through joint evaluation by the organizations involved. In the case of a severe emergency involving off-site consequences, this would include the Recovery Manager, DEP/BRP, and NRC. The Senior Vice President and Chief Nuclear Officer requests that the Talen Corporate Leadership Council establish a restoration organization when the following guidelines have been met:

- In-plant systems are stable, adequate core cooling established and contingency systems and plans available.
- In-plant radiation levels are stable or are decreasing with time.
- Releases of radioactive material to the environment are under control or have ceased.
- Any fire, flooding or similar emergency conditions are under control or have ceased.

Although planning for restoration varies according to the emergency, a long-term restoration organization that is general in nature has been defined. The restoration organization is a project-type organization with their major activities conducted from the EOF. This organization is depicted in Figure 6.6 and major responsibilities are defined below.

- Restoration Manager - A designated officer or senior manager from Susquehanna to manage SSES restoration operations.
- Plant Operations Manager - A designated manager from Susquehanna qualified to control plant operations including security.
- Technical Support Manager - A designated manager from Susquehanna qualified to manage a technical group.
- Radiological Manager - A designated manager qualified to manage the radioactive waste and radiological control aspects.
- Maintenance Manager - A designated manager qualified to coordinate the activities of Susquehanna, NSSS supplier, and construction forces on proposed plant modifications or other construction support.
- Advisory Support Function - Advisory support consists of senior representatives of the NSSS supplier, the NRC, and special consultants.
- Scheduling/Planning Manager - A designated manager to coordinate plans and schedules for the Restoration Manager.
- Administration and Logistics Manager - A designated manager who is responsible for providing administrative, logistic, communications and personnel support.
- Public Information Manager - A designated manager qualified to manage public relations activities.

During restoration operations, the radiation exposure limits of 10CFR20 apply. Compliance with those limits is the responsibility of the Restoration Manager via the applicable Health Physics organization.

At the time of declaring that an emergency has entered the restoration phase, the Restoration Manager is responsible for providing notification to all applicable agencies.

Restoration actions that plan for, or may result in, radioactive release are evaluated by the Restoration Manager as far in advance of the event as is possible. Such events and data are reported to the appropriate off-site emergency response organizations and agencies prior to initiating release.

Table 6.1

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STATION EMERGENCY PLAN MINIMUM STAFFING REQUIREMENTS

Major Functional Area	Major Tasks	Position Title or Expertise	On Shift	Capability for Additions	
				60 min	90 min
Plant Operations and Assessment of Operational Aspects		Shift Manager (SRO)	1	--	--
		Unit Supervisor (SRO)	1##	--	--
		Plant Control Operators	3@	--	--
		Non-Licensed Operators	4	--	--
Emergency Direction and Control (Emergency Director)		Emergency Director	1*	1	--
Notification/Communication	Notify licensee, State, Local, and Federal personnel & maintain communication	Emergency Plan Communicator	1*	1*	1*
		EOF Support Supervisor	--	--	--
		NRC communicator	1*	1*	1*
Radiological Accident Assessment and Support of Operational Accident Assessment	Emergency Operations Facility (EOF) Director	Recovery Manager	--	--	1
	Radiation Protection & Dose Assessment	Radiation Protection Coordinator	--	1	--
		Dose Assessment Supervisor	--	--	1
		Rad Assessment Staff	--	1	2
	Offsite Surveys (Field Teams)	Survey Team Personnel	--	2#	2
	Onsite [out-of-plant (HP Tech)]	Survey Team Personnel	--	1	1
	Radiation Protection & Dose Assessment: a. Access Control b. HP coverage for repair, corrective actions, search and rescue, first aid, & firefighting c. Personnel Monitoring d. Dosimetry e. Dose Assessment f. In-Plant Surveys	HP Technicians	2	3	3
		Chemistry/Radiochemistry	1	1	--

Note: The Capability for Additions column refers to reporting times. Reporting location may be the OSC, TSC, or EOF.

- ## As a result of having a common control room, the Unit Supervisor can be shared between the two units. See Appendix K for staffing assignments during various events or accidents.
- @ One PCO will be assigned to each unit. See Appendix K for staffing assignments during various events or accidents.
- * Indicates the minimum number of individuals onshift with the capabilities of performing these functions. These individuals may also fulfill other responsibilities identified in this table. See Appendix K for staffing assignments during various events or accidents.
- # Radiological monitoring team personnel (see Figure 6.4) – 2 are dispatched from the vicinity of the plant within 60 minutes.

Table 6.1

Emergency Plan, Rev. 59, Page 77 of 313

STATION EMERGENCY PLAN MINIMUM STAFFING REQUIREMENTS

				Capability for Additions	
Major Functional Area	Major Tasks	Position Title or Expertise	On Shift	60 min	90 min
Plant System Engineering	Technical Support	Shift Technical Advisor	1	--	--
		Operations Coordinator	--	1	--
		Core/Thermal Hydraulics Engr.	--	1	--
		Electrical Engr.	--	1	--
		Mechanical Engr	--	1	--
		Technical Support Coordinator	--	1	--
		Severe Accident Management Coordinator	--	1	--
		Engineering Support Supervisor	--	--	1
		Repair and Corrective Actions	Management of Damage Control Teams	Damage Control Team Coordinator	--
OSC Coordinator	--			1	--
Communications with In-plant Teams	Radio Communicator		--	1	--
Repair and Corrective Actions (onshift requirements may be fulfilled by NLOs) **	Mechanical Maintenance/ Rad Waste Operator		1*	1	--
	Electrical Maintenance/ Instrument and Control Technician		1*	1	1
Firefighting	Firefighting communications	--	Fire Brigade per Technical Requirements Manual	Local Support	
Rescue Operations and First Aid	--	--	2*	Local Support	
Site Access Control and Personnel Accountability	Security, personnel accountability	Security Personnel	All per Security plan		
		Security Coordinator	--	1	--
			15	24	14

Plus Fire Brigade and Security Plan
Required Personnel

Note: The Capability for Additions column refers to reporting times. Reporting location may be the OSC, TSC, or EOF.

Note: An on-shift staffing analysis, using the staffing shown in Table 6.1, was completed on 14DEC12 IAW 10CFR50 APP E IV.A.9. The results of the analysis showed that the on-shift staff was able to perform the assigned emergency plan functions. The analysis is contained in Appendix K.

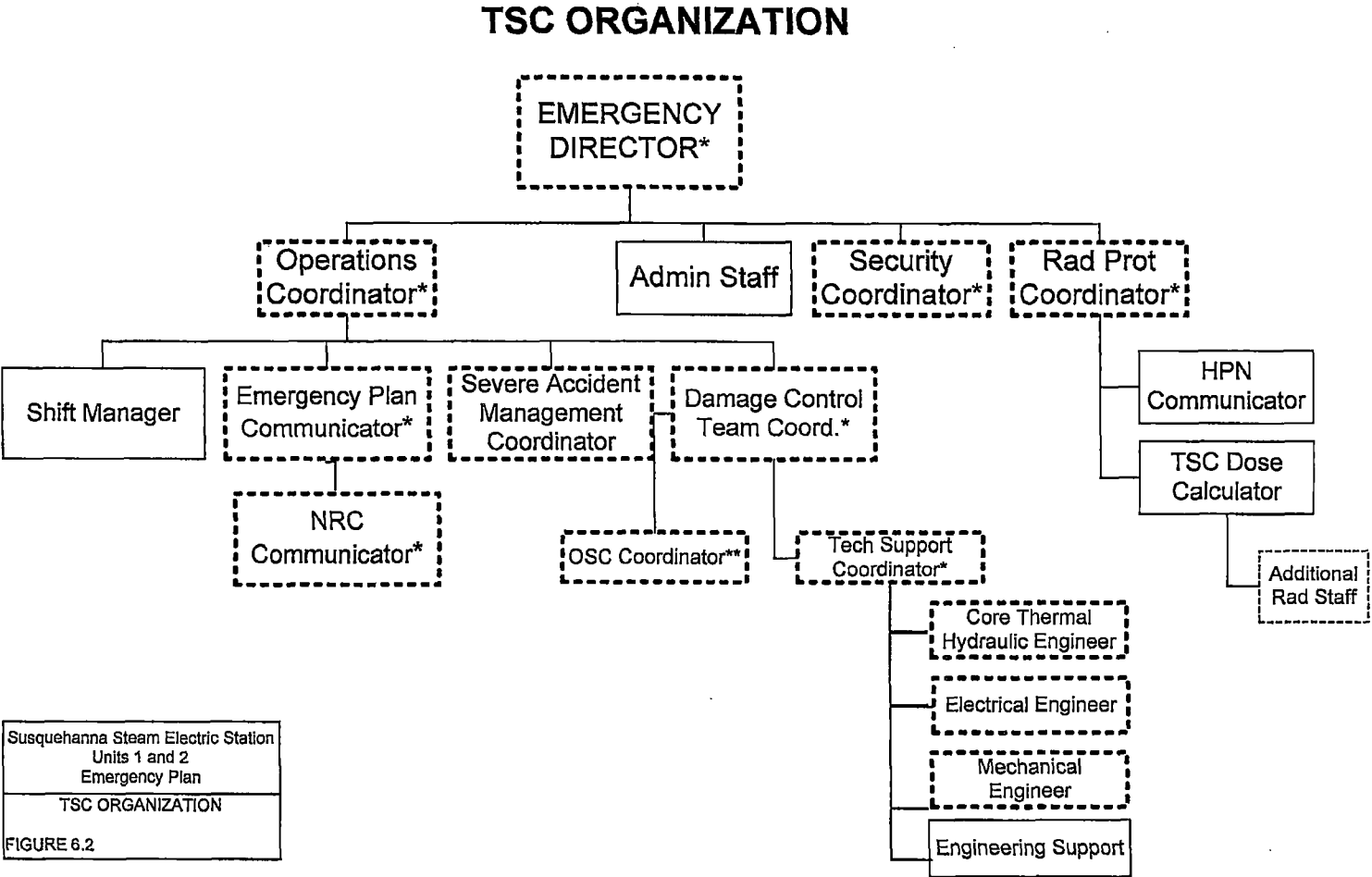
* Indicates the minimum number of individuals onshift with the capabilities of performing these functions. These individuals may also fulfill other responsibilities identified in this table. See Appendix K for staffing assignments during various events or accidents.

** Fulfilled by NLO's on-shift to provide initial damage control repair activities until additional support arrives. Such activities include racking breakers, changing fuses manipulating valves, moving equipment, and starting equipment locally.

TABLE 6.2**ADDITIONAL ASSISTANCE FROM OUTSIDE SUSQUEHANNA**

Name/Address	Emergency Function	Availability (Hours)	Reporting Location
1. <u>Committed Resources</u>			
• General Electric	Engineering advise and analysis for NSSS equipment	N/A	GE Facilities
	Operations and Maintenance expertise on NSSS equipment	48	EOF
• INPO Atlanta, GA	Operations and Maintenance expertise	On call 24 hrs. a day	INPO HQ in Atlanta
	Dissemination of information	N/A	INPO HQ in Atlanta
• Other Nuclear Utility Support	Operations, Maintenance, Radiological personnel for augmenting emergency staffing	4	EOF

NOTE: The Administrative Coordinator maintains the information necessary to contact appropriate vendors in case of an emergency.



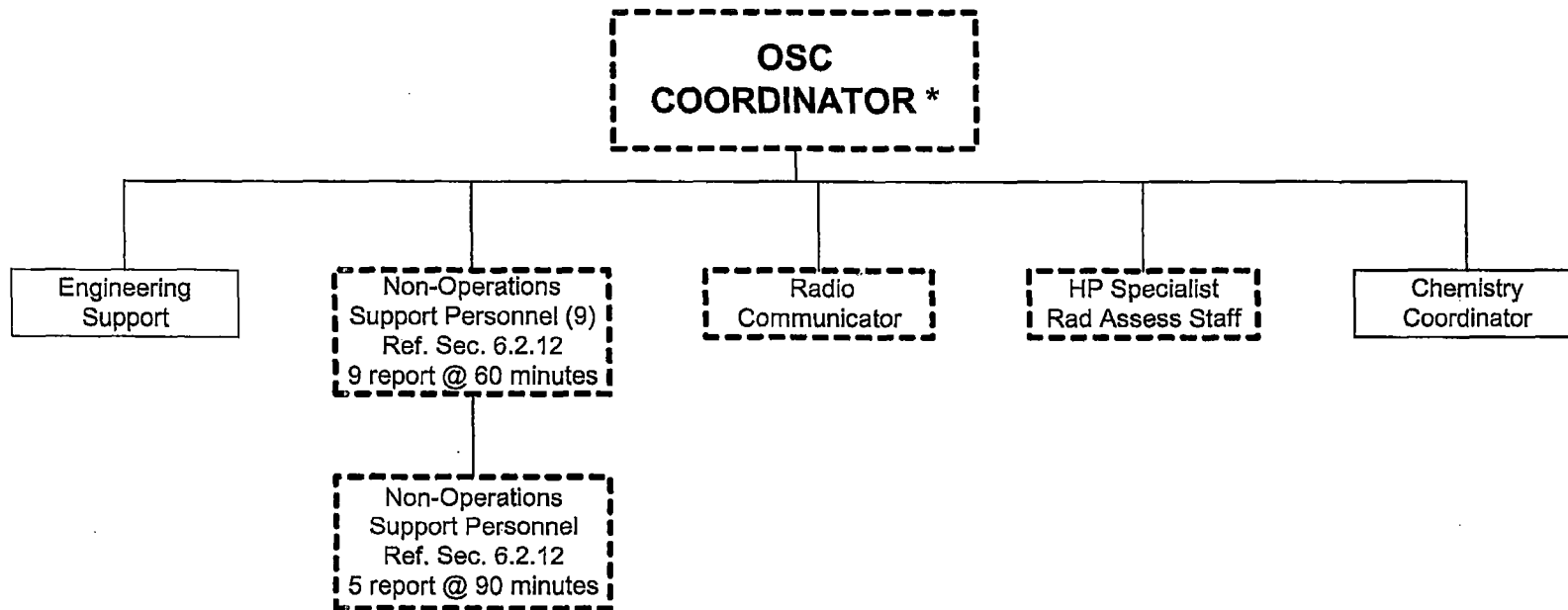
Designates minimum requirements in accordance with Table 6.1 for 60-minute response.

----- Individuals may be located in the OSC, TSC, or Field.

* Designates positions required for TSC activation.

** Located in the OSC. See Figure 6.3

OSC ORGANIZATION

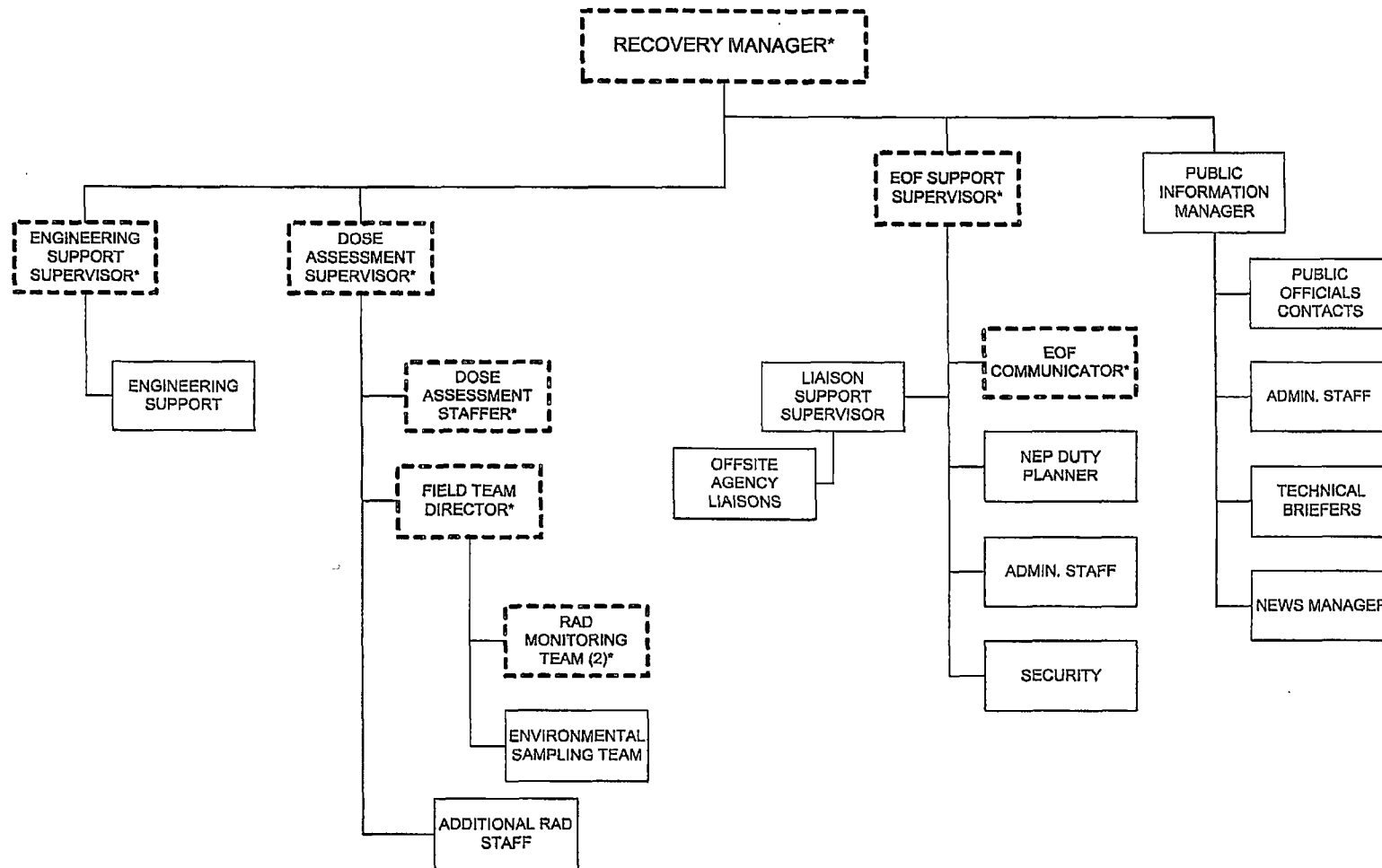


* Designates positions required for OSC activation.

Designates minimum requirements in accordance with Table 6.1 for 60-minute response.

Susquehanna Steam Electric Station Units 1 and 2 Emergency Plan
OSC ORGANIZATION
FIGURE 6.3

EOF ORGANIZATION

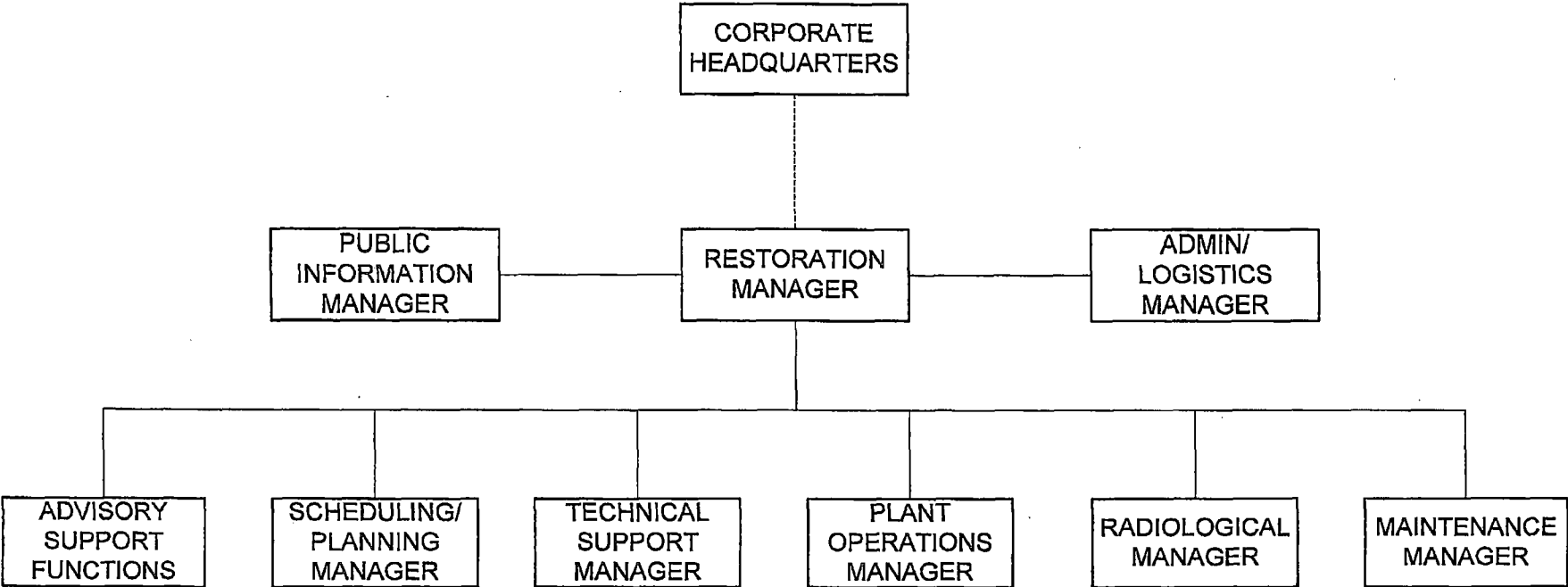


Designates minimum requirements in accordance with Table 6.1 for 90 minute response.

* Designates positions required for EOF activation.

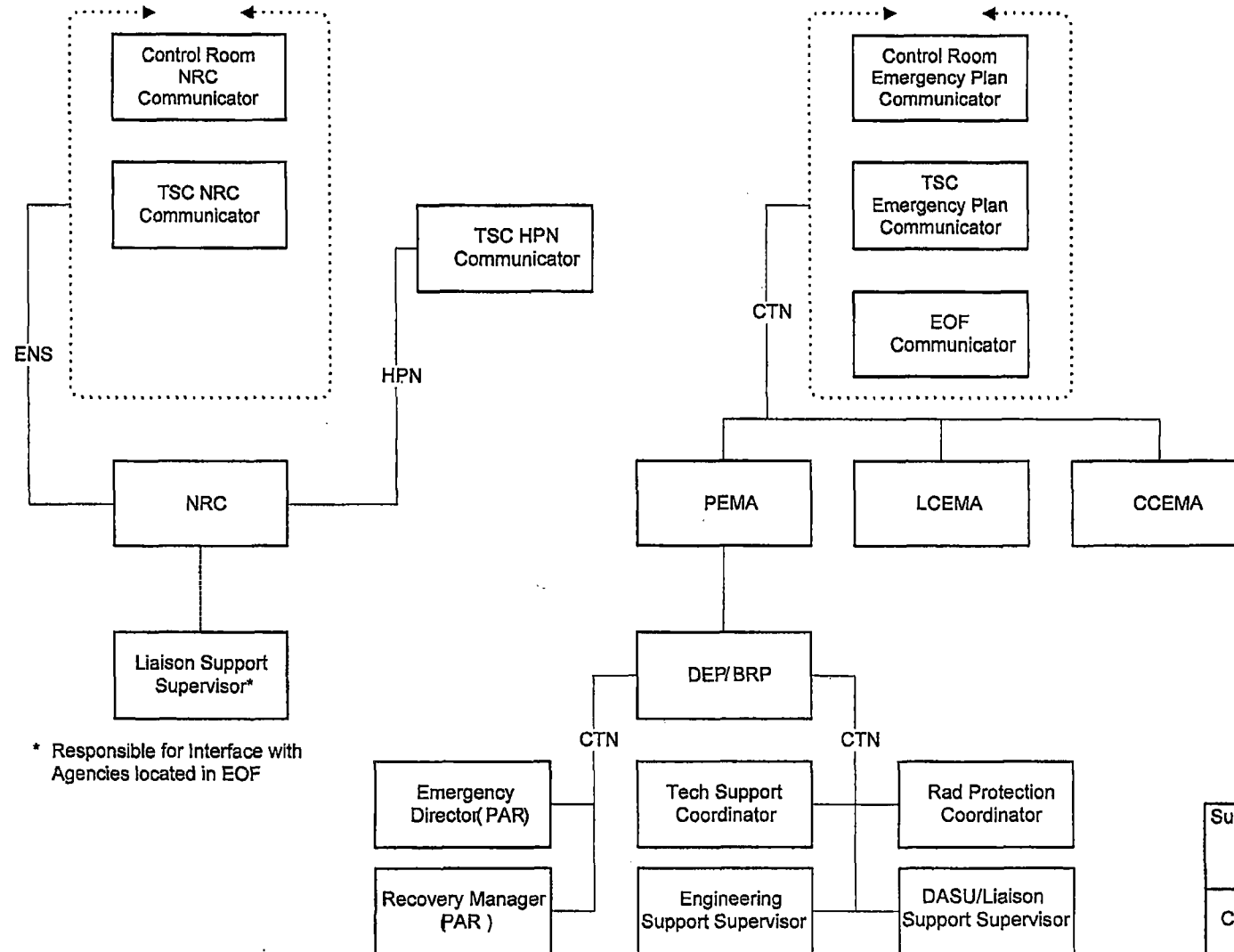
NOTE: RAD Monitoring Team (2) refers to 1 Team with 2 people. A second Team with 2 additional people is part of "Additional RAD Staff"

Susquehanna Steam Electric Station Units 1 and 2 Emergency Plan
EOF ORGANIZATION
FIGURE 6.4



Susquehanna Steam Electric Station Units 1 and 2 Emergency Plan
LONG TERM RESTORATION ORGANIZATION
FIGURE 6.6

COMMUNICATION INTERFACES WITH OFF - SITE AGENCIES



* Responsible for Interface with Agencies located in EOF

Susquehanna Steam Electric Station
Units 1 and 2
Emergency Plan

COMMUNICATION INTERFACES
WITH OFF-SITE AGENCIES

FIGURE 6.7

7.0 EMERGENCY MEASURES

7.1 ASSESSMENT ACTIONS FOR ALL EMERGENCY CLASSIFICATIONS

Provisions are made for assessment through the course of an emergency to ensure effective coordination, direction and upgrading of emergency activities in a timely manner. The assessment actions are described in detail in Emergency Plan Position Specific Instructions (EP-PSs).

Continuous assessment of the status of plant systems and radiological conditions is provided by plant instrumentation and is supplemented by routine surveillance functions. The occurrence of an Unusual Event is recognized by instrument alarms or indications, surveillance results, or other observation of an off-normal condition by an individual at the station.

Assessment actions are described below. For a Notification of Unusual Event, one or more of the actions listed below will be initiated; for higher emergency classifications, actions are continued, intensified, and increased in frequency.

Table 7.1 provides a Summary of Notification & Response Actions outlined in Section 7.1.

- Perform surveillance of in-plant instrumentation.
- Initial and continued observation of off-normal conditions.
- Obtain assistance from off-duty personnel and/or off-site support groups.
- Perform dose calculation activities. Correlate with field team data.
- Deploy field radiological monitoring teams to perform direct radiation measurements and air sampling.
- Perform sampling and analysis of environmental media.
- Deploy on-site damage control teams.
- Perform reactor coolant sampling and analysis.

7.1.1 Off-Site Dose Calculations

The Emergency Director is responsible for initiating off-site dose calculation and assessment activities. These activities are performed by health physics trained personnel who report to the Technical Support Center (TSC) (or the Control Room for all initial entries into the Emergency Plan). Data from the vent effluent monitors and the meteorological towers serve as inputs for the off-site dose calculation methods.

The ED is responsible for calling in personnel to the TSC to perform off-site dose assessment activities. The Radiation Protection Coordinator reports to the TSC within 60 minutes of notification.

Field monitoring teams are directed to selected monitoring location(s) by either the Radiation Protection Coordinator, Dose Assessment Supervisor, Dose Assessment Staffer, or Field Team Director via radio and/or phone communication. The results of the teams' surveys are used to update projected doses and dose calculational assumptions. In addition, an independent Remote Monitoring System can be used, if desired, to supplement the information obtained by field monitoring teams. This Remote Monitoring System uses fixed radiation detectors which are located near the site perimeter and mobile monitoring equipment to locate and assess elevated radiation levels. This system is not required, but can be used, if desired, to supplement the existing monitoring capabilities. Terminals for this system are located in both the TSC and EOF.

The initial field monitoring team(s) are staffed within 60 minutes. Additional team(s) are dispatched upon activation of the EOF.

Each radiological monitoring team is supplied with a survey meter and low volume air sampler. TLDs are located at 17 sites around the station to provide early information on accumulated off-site doses. Two sets of TLDs are provided at each of these sites; one set for dose accumulation during the period of releases and one set maintained for the normal monitoring period or exchanged early at the Dose Assessment Supervisor's discretion to meet information needs.

The ED and Recovery Manager recommend appropriate protective actions to PEMA Operations Center, Harrisburg, based upon the results of the off-site dose assessment activities.

7.1.1.1 Meteorology

The SSES on-site meteorological measurement system is based upon an on-site primary meteorological tower located to the east southeast of the station. The primary tower provides measurements of wind speed, wind direction, and wind variability at its 10 and 60-meter levels, temperature differential between the 10 and 60-meter levels, and ambient temperature and dew point at the 10-meter level. Precipitation is measured at ground level. In case of primary tower failure, a 10-meter on-site backup meteorological tower will provide measurements of wind speed, wind direction, and wind variability.

A permanent supplemental tower is installed in the river valley near the station to provide additional meteorological data to more accurately model the effects of surrounding terrain on atmospheric dispersion and transport. The tower is located approximately 3.6 miles SW of the station off Route 93 just east of Nescopeck.

The tower measures wind speed, wind direction, and sigma theta at the 33-foot level. The tower also measures temperature at a height of approximately 6.6 feet. The meteorological data collected from this tower is used only to support assessment and restoration efforts in the event there is an accidental release of radioactive material from SSES.

The meteorological systems are instrumented to provide continuous data to the control room and the Plant Integrated Computer System (PICSY) for utilization in the TSC and EOF. Data that enters PICSY is viewable through various display formats and is also transmitted to the NRC via ERDS. Digital dataloggers are present at all of the SSES meteorological towers. All data is stored locally and is available for acquisition by interrogation across telephone lines. Primary and backup tower strip chart recorders are located in the control room.

Site specific, meteorological information for emergency dose assessment purposes can be obtained by contacting either a meteorologist or the National Weather Service Station using the phone numbers provided in the SSES Emergency Telephone Directory.

7.1.1.2 Health Physics Considerations

In the event of an unplanned radioactive release from either the reactor building vents, the turbine building vents, or the standby gas treatment vent; continuous gross noble gas readings are available from the vent monitors. Each monitor is also equipped with in-line iodine and particulate sampling capability. These in-line samples are periodically removed and analyzed in order to provide iodine and particulate release rate information. Event declarations are based on Noble Gas readings or iodine and particulate sample results.

The following Health Physics considerations are taken into account: selection of the accident type to closely approximate the isotopic mix and average gamma energies of the release occurring, radioactive decay from time of reactor shutdown, plume decay-in-transit and iodine and particulate depletion due to precipitation.

7.1.1.3 Dose Calculations for Airborne Releases

A dose calculation model is used to make current, site specific estimates and predictions of atmospheric effluent transport and diffusion during and immediately following an accidental airborne radioactivity release. The purpose of the prediction is to provide an input to the assessment of the consequences of accidental radioactive releases to the atmosphere and to aid in the implementation of emergency response decisions.

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The dose calculation model used is a fast running, time-dependent, variable trajectory plume segment "B" model with the following capabilities:

- NOTE:** A class "B" model is a numerical model that represents the actual spatial and temporal variations of plume distribution.
- Computes atmospheric dispersion at the site based on atmospheric stability as a function of site specific terrain conditions with 15-minute upgrades of source term and meteorological conditions.
 - Provides estimates of deposition and relative concentration of radioactivity within the plume exposure and ingestion EPZs for the duration of the release.
 - Incorporated in the calculations is wet and dry deposition which enables dose estimates from three pathways - plume, ground shine, and ingestion.

The dose program complies with the "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," (EPA-400), adopting the dose calculation methodology in ICRP #26/30. The accident dose assessments are based on the adult physiology per EPA 400, except for one case-that is, child thyroid dose conversion factors are used in calculating thyroid CDE. However adult physiology is used in calculating thyroid CDE for purposes of evaluating the need for a sheltering only PAR and evaluating controlled venting of containment. Calculations of TEDE are made using the (adult) dose factors provided in EPA-400. The following calculational options are available:

- TEDE (Total Effective Dose Equivalent) integrated doses consisting of the sum of external doses from plume shine, 50 year committed effective dose equivalent from inhalation (CEDE), and 4 day ground shine doses.
- EDE and CDE dose rates for field team management.
- Fifty year thyroid committed dose (CDE), from inhalation of radioactive materials.
- Population dose (person rem) out to 50 miles.
- Summary print of projected doses for each of four projection times.
- Integrated ground dose for projected times specified by the user.

The dose calculation program is a standalone program running on PCs located in the TSC and EOF.

7.1.1.4 Liquid Release Calculations

Estimates of downstream river water concentrations are made by employing effluent sample analysis or discharge monitor data, discharge flow rates and river elevation readings. The river elevation is used to estimate the travel time to the point of interest. The calculated degree of mixing, together with the discharge monitor data and the discharge flow rates are used to calculate downstream concentrations.

7.2 CORRECTIVE ACTIONS

Detailed operating procedures and plant procedures are utilized by the plant operating personnel to assist them in recognizing emergency events and taking the corrective actions necessary to place the plant in a safe condition. Table 6.1 shows personnel available to respond to an emergency. Additionally, EP-PSs describe subsequent and supplemental corrective actions for the scope of potential situations within each of the emergency classifications. These procedures are designed to guide the actions of the personnel to correct or mitigate the condition as early and as near to the source of the problem as feasible.

Some essential corrective actions may involve the risk of emergency exposure to ERO personnel. Such actions could involve preventing the release of large quantities of radioactive material, reducing damage to major equipment or lifesaving actions. Table 7.2 specifies the limits for emergency exposure and other relevant criteria to be considered. The ED is responsible for all corrective actions taken to mitigate the consequences of the accident on-site.

7.3 PROTECTIVE ACTIONS

Protective actions are implemented to prevent or mitigate consequences to individuals during or after a radiological incident. Protective action recommendations within the SSES Exclusion Area and Site Boundary are the responsibility of the ED, but may include assistance by the EOF. Protective actions outside the Site Boundary are primarily the responsibility of State and local emergency organizations, but may include coordination of activities, dissemination of appropriate data, and recommendations by the ED or Recovery Manager. Effective integration of SSES procedures and implementation plans with State and local implementation plans ensure that all members of the public, including those located on Susquehanna property but outside the emergency plan boundary, will be notified of protective actions to be taken and that the actions can be implemented in a timely manner. Protective action recommendations are outlined in Table 7.3.

7.3.1 On-Site Protective Actions

The primary protective measure for on-site personnel in an emergency is prompt evacuation from areas that may be affected by significant radiation, contamination, or airborne radioactivity.

Respiratory protective equipment and clothing are provided at the plant and in the various emergency equipment kits for personnel who may be required to perform emergency activities.

Control of in-plant contamination is in accordance with SSES Health Physics procedures. In the event of radioactive contamination outside fenced security areas, but within the exclusion area, access to such areas is controlled by Susquehanna with assistance from the PSP.

7.3.1.1 Local Area Evacuation

This category refers to evacuation from one area to another area within the same building. The initiation of a Local Area Evacuation results from ARM or CAM alarm(s) sounding in the same area within a building or from observed conditions such as smoke or toxic gas, which may indicate a possible habitability problem. The initial response for individuals is to evacuate to an unaffected area of the building, notify the plant Control Room of the conditions, and await further instruction. The ED assesses the situation, activates appropriate procedures to rectify the condition and informs the personnel when to return to their respective work area via the PA system or direct manual communication.

7.3.1.2 Radiologically Controlled Area Evacuation

The initiation of a Radiologically Controlled Area Evacuation results from ARM, CAM, or other applicable monitor alarms, (i.e., fire alarms). Notification for personnel to proceed with a Radiologically Controlled Area Evacuation is announced over the plant PA system. If all or part of the PA system is unavailable then alternate manual methods may be used to notify personnel of the need for evacuation and/or accountability. The initial mandatory response by individuals is evacuation to an unaffected area. In this case, however, the nearest such area may not be in the same building, and multiple ARM, CAM, or fire alarms are probable.

The decision to implement a Radiologically Controlled Area Evacuation is the responsibility of the ED. Factors to be considered include the apparent levels of radiation and/or airborne radioactivity involved and the exposure to personnel that would result from evacuating to Accountability Areas.

7.3.1.3 Security and Accountability

Accountability of on-site personnel during an emergency is accomplished through the use of the physical security system and station procedures. The physical security system clearly establishes who is within the protected area. Personnel are notified to report to accountability areas during an emergency via an alert signal transmitted over the PA system. If all or part of the PA system is unavailable then alternate manual methods may be used to notify personnel of the need for evacuation

and/or accountability. The names of the personnel reporting in are compared to those logged through the security system in order to ensure total accountability.

If not completed earlier, accountability will be initiated immediately after declaration of a Site Area Emergency and will be completed within 30 minutes of the declaration of a Site Area Emergency.

For certain security-related events, an evacuation of non-essential personnel may be conducted prior to performing accountability. Security will collect badges upon egress from the site and then perform accountability.

7.3.1.4 Site Evacuation

A Site Evacuation requires that all individuals on-site, except for Control Room operations personnel and others with specific emergency assignments, leave the site. If the ED requires off-site assembly, personnel will go to the Remote Assembly Area. The Primary Remote Assembly Area is the Susquehanna Energy Information Center (NE Sector), as shown in Figure 8.1. The alternate Remote Assembly Area is the West Building (WSW Sector). Assembly area leaders will coordinate accountability at Remote Assembly Areas.

Implementation of a Site Evacuation is the responsibility of the ED. That decision is based on the severity of the incident, the likelihood of escalation, and the radiation and airborne radioactivity levels throughout the station. Notification is made via the PA system. If all or part of the PA system is unavailable then alternate manual methods may be used to notify personnel of the need for evacuation and/or accountability.

Accountability is accomplished in passage through the security gate. Personnel and vehicle contamination surveys are performed at the Remote Assembly Area, using portable survey instruments.

For certain events such as some security events, on-site personnel may be directed to remain in place due to personal safety concerns until a more appropriate time for accountability and evacuation. Station procedures specify those security contingencies. *

* Letter dated February 25, 2002 from Samuel J. Collins, Director, Office of Nuclear Reactor Regulations, to Robert G. Byram, Senior Vice President and Chief Nuclear Officer. Subject: Issuance of Order for Interim Safeguards and Security Compensatory Measures for – Susquehanna Steam Electric Station, Units 1 & 2.

7.3.2 Off-Site Protective Actions

The responsibility for actions to protect off-site individuals rests with the Commonwealth of Pennsylvania.

DEP/BRP is responsible for evaluating information obtained from SSES and other sources and recommending appropriate off-site protective actions to PEMA. Such recommendations include:

- Shelter for affected populations
- Evacuation of affected populations
- Administration of thyroid prophylaxis
- Control of contaminated agricultural products

The principal off-site local coordinating agency is LCEMA. Since the area and population inside the ten-mile EPZ are partially within Columbia County, parallel emergency response functions are provided by CCEMA. Upon notification by PEMA of a situation that may require protective actions for off-site populations, LCEMA and CCEMA initiate appropriate actions. If PEMA has lost communication or is otherwise unavailable, it is possible that the ED or Recovery Manager may contact LCEMA and CCEMA directly with protective action recommendations. If time permits, LCEMA and CCEMA obtain a review and verification by PEMA of recommendations made by the ED or Recovery Manager.

LCEMA and CCEMA protective actions include:

- Prompt alerting of the population within ten miles of the SSES through the use of the Alert Notification System (described in Section 8.0) and Route Alerting Teams, a supplement to the siren system that is implemented, as necessary, in the event of siren failure or to alert persons or areas that may not be within the sound of the sirens. Route alerting is a municipal responsibility and is accomplished by municipal route alert teams traveling in vehicles along preplanned routes delivering the following message: "There is an emergency at the Susquehanna Steam Electric Station; please tune to your Emergency Alert Station."
- Transmission of specific instructions to potentially affected populations via the Emergency Alert System.
- Assistance for evacuation of the population within the ten-mile EPZ.

Appendix G includes the estimated times to evacuate all or segments of the population from the 10-mile EPZ, identifies potential problem areas and provides contingencies for dealing with adverse conditions. It was utilized in the development of detailed evacuation plans by PEMA, LCEMA, and CCEMA.

7.4 AID TO AFFECTED PERSONNEL

7.4.1 Emergency Exposure

All reasonable measures are taken to maintain the radiation exposure of emergency personnel who provide rescue, first aid, decontamination, ambulance, firefighting, law enforcement or medical treatment services within applicable limits specified in Table 7.2. "Guidance on Dose Limits for Workers Performing Emergency Services". Table 7.2 summarizes the emergency exposure criteria for entry or re-entry into areas for purposes of undertaking protective or corrective actions. Actions taken to provide the support activities listed above are considered commensurate with the activities listed in Table 7.2. Methods and conditions for permitting volunteers to receive emergency radiation exposures are described in EP-PS procedures, and provide for expeditious decisions with consideration to known and reasonable balance of associated risks.

7.4.2 Decontamination and First Aid

Personnel contamination in emergency situations is controlled to the extent feasible by the normal methods of using protective clothing and surveying for contamination following the removal of such clothing. Personnel decontamination areas are available in-plant and decontamination efforts involving significant amounts of contamination are performed under the direction of Health Physics personnel.

At least two persons who are qualified in first aid methods are on-site at all times. First aid to injured personnel can be performed in conjunction with any necessary decontamination methods. However, if immediate treatment of the injury is vital, that treatment takes precedence over decontamination. This philosophy also extends to off-site emergency assistance involving radioactive contamination. For that purpose, measures are established to ensure timely off-site medical treatment.

7.4.3 Medical Transportation and Treatment

Arrangements and agreements have been made for the transportation and treatment of patients from SSES, who may have injuries complicated with radioactive contamination or who may have been involved in a radiation incident.

CODE: Notification of Unusual Event = 1
 Alert = 2
 Site Area Emergency = 3
 General Emergency = 4

TABLE 7.1
SUMMARY OF IMMEDIATE NOTIFICATION AND RESPONSE FOR ALL CLASSIFICATIONS

O N S I T E		O F F S I T E	
IMMEDIATE NOTIFICATIONS	ACTIONS	IMMEDIATE NOTIFICATIONS	ACTIONS
Fire Brigade (1-4)	Fight Fire (1-4)	Fire Units (1-4)	Fight Fire (1-4)
Damage Control Team (1-4)	Repairs (1-4)		
First Aid/Rescue Team (1-4)	Rescue (1-4) First Aid (1-4)	Rescue Assistance (1-4) Ambulance (1-4) Hospital (1-4)	Rescue (1-4) Transport (1-4) Treatment (1-4)
Security Force (1-4)	Security Measures (1-4) Personnel Evacuation (1-4)	PSP (1-4)	Assist Security (1-4)
Dose Assessment Personnel (1-4)	Dose Calculations (1-4) Dose Assessment (1-4)	Talen Headquarters (1-4)	Confirmatory Calculations (2-4) Maintain Communications (2-4)
Field Monitoring Teams (1-4)	Field Monitoring (1-4)		Field Monitoring and Continuous Evaluation of Dose Projections (2-4)
All Other Station Personnel (1-4)	Augment Shift Resources/Activate TSC (2,3,4) Augment Resources/Activate Offsite ERO (2,3,4)* Personnel Evacuation (as appropriate) (3,4)	Talen Headquarters(1-4) Site personnel designated as off-site response (2,3,4)*	Alert Key Personnel (1) Activate and Staff Offsite ERO (2,3,4) Recommend Offsite Action (4)

* TSC and EOF (or alternate TSC) will be activated for certain security events such as a site-specific credible security threat. Letter dated February 25, 2002 from Samuel J. Collins, Director, Office of Nuclear Reactor Regulations, to Robert G. Byram, Senior Vice President and Chief Nuclear Officer. Subject: Issuance of Order for Interim Safeguards and Security Compensatory Measures for – Susquehanna Steam Electric Station, Units 1 & 2.

TABLE 7.1 SUMMARY OF IMMEDIATE NOTIFICATION AND RESPONSE FOR ALL CLASSIFICATIONS			
O N S I T E		O F F S I T E	
IMMEDIATE NOTIFICATIONS	ACTIONS	IMMEDIATE NOTIFICATIONS	ACTIONS
		SEIC/JIC (1-4)	Provide Info to Public via Media (1-4)
		LCEMA, CCEMA, PEMA, NRC (1-4)	Place ANS & Procedures on Standby (2) Activate and Staff Response Centers (2-4) Activate the Emergency Response Data System (2-4) Implement Off-site Protective Measures (4)

NOTES: 1. Notification is required to LCEMA, CCEMA, and PEMA within 15 minutes of indication and verification of the event for Unusual Event, Alert, Site Area, and General Emergency.

2. Initial notification for all levels of emergencies are to LCEMA, CCEMA, PEMA, and NRC.

TABLE 7.2
EMERGENCY EXPOSURE CRITERIA

Planned exposure to the whole body and/or specific organs should not exceed the following recommendations of the National Council on Radiation Protection and Measurements and the Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (EPA-400). Guidance on dose limits for workers performing emergency services is summarized in tabular format below.

NOTE: These limits apply to doses incurred over the duration of an emergency, treated as a once in a lifetime exposure, and not added to occupational exposure accumulated under non-emergency conditions.

Doses to all workers including local offsite support agencies such as firefighting, ambulance services or Local Law Enforcement Agencies during emergencies should, to the extent practical, be limited to 5 rem. There are some emergency situations for which higher exposure limits may be justified. The need for authorization of potential doses greater than 5 rem should be evaluated based on the criteria specified below under "Guidance on Dose Limits for Workers Performing Emergency Services." Justification of any such exposure must include the presence of conditions that prevent the rotation of workers or other commonly used dose reduction methods.

NOTE: Exposure of workers that is incurred for the protection of large populations may be considered justified for situations in which the collective dose avoided by the emergency operation is significantly larger than that incurred by the workers involved.

Persons undertaking any emergency operation in which the dose will exceed 25 rem to the whole body should do so only on a voluntary basis and with full awareness of the risks involved, including the numerical levels of dose at which acute effects of radiation will be incurred and numerical estimates of risk of delayed effects.

Guidance on Dose Limits for Workers Performing Emergency Services

Dose Limit ^a (rem)	Activity	Condition
5 rem	All	
10 rem	Protecting Valuable Property	Lower Doses Not Practicable
25 rem	Lifesaving or protection of large populations	Lower Doses Not Practicable
>25 rem	Lifesaving or protection of large populations	Only on a voluntary basis to persons fully aware of the risks involved (see attached tables)

^a Sum of external effective dose equivalent and committed effective dose equivalent to non-pregnant adults from exposure and intake during an emergency situation. Workers performing services during emergencies should limit dose to the lens of the eye to three times the listed value and doses to any other organ (including skin and body extremities) to ten times the listed value. These limits apply to all doses from an incident, except those received in unrestricted areas as members of the public during the intermediate phase of the incident.

TABLE 7.2
EMERGENCY EXPOSURE CRITERIA

Additional General Criteria

- Only volunteers are given planned emergency exposure.
- Attached tables provide information concerning acute and delayed health effects.
- Whenever practical, consideration is given to dividing exposure among as many personnel as possible.
- Potassium iodide utilization for iodide prophylaxis requires the approval of the Emergency Director or the Recovery Manager in consultation with the Radiation Protection Coordinator or the Dose Assessment Supervisor and medical consultants, if available. It is recommended that potassium iodide be administered in situations where potential exposure of the thyroid is anticipated to exceed 10 rem or at lower dose levels if judged as needed by the RPC or DASU.
- All reasonable measures must be taken to control contamination and internal exposure.
- Persons performing emergency activities should be familiar with exposure consequences.
- Women capable of reproduction should not take part in these actions.
- Retrospective doses are evaluated on an individual case basis.
- To the extent reasonable, persons with high lifetime cumulative radiation exposure should not take part in these actions.
- As in the case of normal occupational exposure, doses received under emergency conditions should be maintained as low as reasonably achievable.

Health Effects Associated with Whole Body Absorbed Doses Received Within a Few Hours^(a)

Whole Body Absorbed Dose (rad)	Early Fatalities^(b) (percent)	Prodromal Effects^(c) (percent affected)
050	--	2
100	--	15
140	5	--
150	--	50
200	15	85
250	--	98
300	50	--
400	85	--
460	95	--

^a Risks will be lower for protracted exposure periods.

^b Supportive medical treatment may increase the dose at which these frequencies occur by approximately 50 percent.

^c Forewarning symptoms of more serious health effects associated with large doses of radiation.

TABLE 7.2 EMERGENCY EXPOSURE CRITERIA
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Approximate Cancer Risk to Average Individuals from 25 rem Effective Dose Equivalent
Delivered Promptly

Age at Exposure (years)	Approximate Risk of Premature Death (deaths per 1,000 persons exposed)	Average Years of Life Lost if Premature Death Occurs (years)
20 to 30	9.1	24
30 to 40	7.2	19
40 to 50	5.3	15
50 to 60	3.5	11

TABLE 7.3

PROTECTIVE ACTION RECOMMENDATIONS

Emergency Conditions	Susquehanna Actions	Susquehanna Recommendations
<p>A. Airborne Release</p> <p>1. General Public</p>	<p>Determine the following:</p> <p>1. Plant status and prognosis.</p> <ul style="list-style-type: none"> Degree of fuel damage Containment integrity Decay heat removal Ventilation systems Remedial, mitigating actions in progress <p>2. Status of radioactive releases.</p> <ul style="list-style-type: none"> Release path, monitored, unmonitored, both Duration of release Trend of release, increasing, decreasing, constant Treatment availability, filtered, unfiltered Type of release, gap, fuel melt Prognosis for changes in above 	<p>SSES will provide an initial PAR to the Senior State Official within 15 minutes from the declaration of a General Emergency as follows:</p> <ol style="list-style-type: none"> For a Rapidly Progressing Severe Accident (RPSA): <ol style="list-style-type: none"> Evacuate 2 mile radius; Evacuate affected sectors 2-10 miles downwind. For a Hostile Action Based (HAB) GE event: <ol style="list-style-type: none"> Shelter 5 mile radius. For all other General Emergencies: <ol style="list-style-type: none"> Evacuate 2 mile radius; Evacuate affected sectors 2-5 miles downwind. <p>3.1 When there is a Controlled Containment Venting of less than an hour AND a valid dose assessment projects doses less than 1000 mrem TEDE and less than 5000 mrem Adult Thyroid CDE at EPB AND the PAR is issued by extended ERO (TSC or EOF):</p> <ol style="list-style-type: none"> Shelter 2 mile radius; Shelter affected sectors 2-5 miles downwind. <p>Initial PAR shall also advise citizens to take KI in accordance with the state's emergency plans and advise remainder of the EPZ to monitor and prepare.</p> <p>Continue assessment based on available plant and field monitoring information and evaluate for subsequent PARs in accordance with:</p> <ol style="list-style-type: none"> Until RPSA conditions do not apply any more, ERO shall consider the following subsequent PARs based on dose assessment results or changes in wind direction affecting new sectors, if conditions exist which would require classification of a General Emergency per EALs: <ol style="list-style-type: none"> Evacuate additional affected sectors 2-10 miles downwind Evacuate all sectors where PAGs were exceeded or are expected to be exceeded. Until HAB conditions do not apply any more, ERO shall consider the following subsequent PARs based on dose assessment results: <ol style="list-style-type: none"> Evacuate 2 mile radius Evacuate all sectors where PAGs were exceeded.

TABLE 7.3

PROTECTIVE ACTION RECOMMENDATIONS

Emergency Conditions	Susquehanna Actions	Susquehanna Recommendations
A. Airborne Release (Cont'd)	Determine the following:	
1. General Public (Cont'd)	3. Weather Conditions, effect on dose projections. 4. Dose projections and avoided dose.	3. If RPSA or HAB conditions do not apply, or for all other General Emergencies, ERO shall consider the following subsequent PARs based on dose assessment results or changes in wind direction affecting new sectors, if conditions exist which would require classification of a General Emergency per EALs: a. Evacuate additional affected sectors 2-5 miles downwind b. Evacuate all sectors where PAGs were exceeded or are projected to be exceeded. c. Evacuate 2 mile radius, IF <u>NOT</u> previously recommended 3.1 When there is a Controlled Containment Venting of less than an hour AND a valid dose assessment projects doses less than 1000 mrem TEDE and less than 5000 mrem Adult Thyroid CDE at EPB AND the PAR is issued by extended ERO (TSC or EOF): a. Shelter additional affected sectors 2-5 miles downwind. If the state has informed SSES of impediments to evacuation, recommend shelter "in place" instead of "evacuate" The PAR methodology described above complies with 10CFR50.47(b)(10), Appendix E to Part 50, Section IV Paragraph 3 and NUREG-0654, Supplement 3, Rev 1.

Emergency Conditions	Susquehanna Action	Results	Susquehanna Recommendations
A. Airborne Release (Cont'd.)	1. Determine the following:		
2. Dairy Cows	a. Peak activity for 131 b. Meteorological Conditions (1) Wind Speed (2) Precipitation (3) Stability Class (4) Wind Direction	a. Forage Concentration .05 micro Ci/kg Milk .015 micro Ci/l 1.5 Rem projected dose to the infant thyroid whichever is first. b. Known sectors potentially affected	DEP/BRP to recommend appropriate protective action to affected farmers.

TABLE 7.3

PROTECTIVE ACTION RECOMMENDATIONS

Emergency Conditions	Susquehanna Action	Results	Susquehanna Recommendations
B. Liquid Radioactive Release Into Susquehanna River	<ol style="list-style-type: none"> 1. Determine the following: <ol style="list-style-type: none"> a. Source of release b. Volume (approx.) of release c. Anticipated length of time release will continue 2. Notify: <ol style="list-style-type: none"> a. DEP/BRP b. Danville Water authority c. NRC 3. Initiate sampling of: <ol style="list-style-type: none"> a. Release point b. Susquehanna River 4. Initiate projections of radionuclide activity concentrations at the Danville Water Authority. 	A single isotope exceeds its specific effluent concentration (EC) value from Column 2 of Table 2 of Appendix B to 10CFR20 or diluted sum of EC fractions at Danville is greater than 0.85.	<ol style="list-style-type: none"> 1. Recommend to DEP/BRP that consideration be given to termination of user intake of all downstream users. 2. Assess additional results of sampling and analyses of radionuclide activity concentrations of SSES liquid effluent and/or Susquehanna River water upstream of the Danville Water Authority, and provide appropriate updated recommendations to DEP/BRP based on that assessment.

8.0 EMERGENCY FACILITIES AND EQUIPMENT

8.1 ON-SITE EMERGENCY CENTERS

8.1.1 Control Room

The Control Room is the primary location for the initial assessment and coordination of corrective actions for all emergency conditions. The Control Room is equipped with the display and controls for all critical plant systems, radiological and meteorological monitoring systems, and all station communication systems. Reference Appendix D, Enclosure 7.

Off-site emergency functions initially served by the Control Room are transferred to the TSC or EOF for an Alert, a Site Area Emergency, or a General Emergency as deemed appropriate by the ED. If the TSC and/or EOF are staffed, the functions may also be transferred at the Notification of Unusual Event level. The primary consideration is to ensure that the number of personnel involved with the emergency in the Control Room shall not impair the safe and orderly shutdown of the reactor or the operation of plant safety systems.

8.1.2 Operations Support Center

The OSC is the primary on-site assembly area for operations support team personnel during an emergency. There are 2 OSC areas—a primary OSC located separate from the TSC and Control Room and a backup OSC located in the Control Structure. The primary OSC is located on the first floor of the South (Administrative) Building. The backup OSC occupies 340 square feet adjacent to the Control Room on Elevation 729'-1" of the control structure.

The OSC is utilized initially as the central location for assembly and accountability of on-shift emergency team personnel required to perform such functions as: firefighting, first aid, search and rescue, damage control, and on-site radiation monitoring. If and when the TSC is activated, all non-operations support team personnel assemble and are accounted for in the OSC (or TSC if the backup OSC is being utilized.) TSC personnel assess the need for emergency team personnel and based on this assessment, the OSC dispatches available team personnel and call in additional personnel as needed. The OSC and TSC assembly areas will be monitored continuously for habitability. If these areas become uninhabitable, retained personnel will be directed to alternate holding areas. Control and dispatch of these teams is the responsibility of the Radio Communicator. The OSC Coordinator manages operations and other support personnel.

Equipment required for these teams to perform their functions, as outlined in Appendix D is stored and maintained in the Control Room, Operations Support Center, Health Physics access control points and Maintenance tool areas.

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In the event of hazards preventing site access such as certain security events, personnel who normally report to the Operations Support Center will report to the Alternate OSC at the Emergency Operations Facility. The alternate OSC will be activated as soon as possible to support the site; however, it is recognized that the activation time in the alternate OSC may exceed 60 minutes. *

8.1.2.1 The Primary OSC

The primary OSC is located on the first floor of the South (Administration) Building. The OSC facilities may be used for normal daily activities that do not degrade OSC emergency preparedness.

8.1.2.1.1 Habitability

8.1.2.1.1.a Allowable Post-Accident Radiation Doses

The primary OSC is monitored for radiation exposure using a local ARM and Continuous Air Monitor. The radiation dose will be limited to less than 5 Rem TEDE, at which time the primary OSC will be relocated to the backup OSC. Applicable criteria are specified in General Design Criterion 19, Standard Review Plan NUREG 0800 Section 6.4, and NUREG-0737, Item II.B.2.

8.1.2.1.1.b Postulated Post Accident Radiation Doses

The primary OSC is monitored for radiation exposure using a local ARM and Continuous Air Monitor. The radiation dose will be limited to less than 5 Rem TEDE, at which time the OSC will be relocated to the backup OSC. Applicable criteria are specified in General Design Criterion 19, Standard Review Plan NUREG 0800 Section 6.4, and NUREG-0737, Item II.B.2.

8.1.2.1.1.c Radiation Monitoring

A portable ARM will be installed in the primary OSC area and a Continuous Air Monitor is installed in the South (Administration) Building cafeteria, which is adjacent to the primary OSC. This area serves as an accountability area and a holding area for essential personnel.

* Letter dated February 25, 2002 from Samuel J. Collins, Director, Office of Nuclear Reactor Regulations, to Robert G. Byram, Senior Vice President and Chief Nuclear Officer. Subject: Issuance of Order for Interim Safeguards and Security Compensatory Measures for – Susquehanna Steam Electric Station, Units 1 & 2.

8.1.2.1.2 HVAC

The primary OSC is subject to normal South (Administration) Building ventilation.

8.1.2.1.3 Shielding

There is no special shielding installed. The primary OSC is located in an area with no outside walls.

8.1.2.1.4 Occupant Accommodations

Since the primary OSC is located in an administration building, toilet facilities and water are available.

8.1.2.1.5 Communications

The primary OSC communication system includes the plant PA system and telephone lines tied through the plant switchboard.

8.1.2.1.5.a Telephone

The normal telephone service for the primary OSC uses the plant ETN system, and can reach on and offsite locations.

8.1.2.1.5.b Public Address System

The PA system is part of the plant PA system. The system provides two-way communications at handset stations. Each station may originate and receive communications by switching to either a page channel or to one of five non-interfering party line channels.

8.1.2.2 Backup OSC

A backup OSC area exists in the Control Structure and would be used in the event the primary OSC becomes uninhabitable. During normal plant operations, this area serves as an operations staff work area for shift changeover purposes as well as shift work assignment area. The Non-Emergency use of the OSC does not degrade its primary purpose.

8.1.2.2.1 Habitability

8.1.2.2.1.a Allowable Post-Accident Radiation Doses

Back-up OSC personnel are protected from radiological hazards, including direct shine and airborne activities for postulated accident conditions to the same degree as Control Room personnel. Applicable criteria are specified in General Design Criterion 19, Standard Review Plan NUREG 0800 Section 6.4, and NUREG-0737, Item II.B.2

8.1.2.2.1.b Postulated Post Accident Radiation Doses

The radiation dose to personnel occupying the backup OSC is the same as the Control Room personnel. The doses from controlling accidents are summarized in Chapter 15.0 of the FSAR.

8.1.2.2.1.c Radiation Monitoring

To ensure adequate radiological protection of the backup OSC personnel, a commercial grade monitor located in the center of the Control Room alarms on high gross gamma radiation dose rates.

8.1.2.2.2 HVAC

The backup OSC HVAC system is a part of the Control Room HVAC system which is described in FSAR Section 9.4.1.

8.1.2.2.3 Shielding

Shielding requirement for the backup OSC is the same as for the Control Room for total dose to occupants from direct shine and airborne. Exposure does not exceed 5 Rem TEDE for the duration of the accident. This is in accordance with General Design Criterion 19, USNRC Standard Review Plan NUREG 0800 Section 6.4, and NUREG-0737, Item II.B.2. Duration of occupancy and method of analysis is the same as that used for the Control Room. Access control may need to be applied within five feet of the east wall of the Control Structure (including the backup OSC) as described in Emergency Plan position specific procedures.

8.1.2.2.4 Occupant Accommodations

No toilet facilities are provided in the backup OSC. Facilities are available in the Control Room and at grade level of the control structure for washing and toilet accommodations.

8.1.2.2.5 Communications

The backup OSC communication system includes the plant PA system and telephone lines tied through the plant switchboard.

8.1.2.2.5.a Telephone

The normal telephone service for the backup OSC uses the plant ETN and CTN systems. Both systems have the capability to reach on and offsite locations.

8.1.2.2.5.b Public Address System

The PA system is part of the plant PA system. The system provides two-way communications at handset stations. Each station may originate and receive communications by switching to either a page channel or to one of five non-interfering party line channels.

8.1.3 Technical Support Center

The TSC is a controlled access area that provides working space and facilities for approximately 25 ERO personnel. These personnel provide guidance to plant operations personnel for management of emergency conditions and accident mitigation.

The TSC is located in the existing Control Room mezzanine above the Control Room at elevation 741'-1" of the control structure and occupies approximately 2500 square feet. The TSC is within approximately two minutes travel time of the Control Room by elevator or stairs.

The TSC facilities may be used for normal daily activities that do not degrade TSC emergency preparedness. The TSC provides office space for Operations and Technical personnel. Other station personnel may also use the facilities as a research or reference area.

In the event of hazards preventing site access such as certain security events, personnel who normally report to the Technical Support Center will report to the Alternate TSC at the Emergency Operations Facility. The alternate TSC will be activated as soon as possible to support the site; however, it is recognized that the activation time in the alternate TSC may exceed 60 minutes.

8.1.3.1 Spatial Layout Description

The TSC includes areas for work, conferencing (NRC & Susquehanna), document control, and computer monitoring. Housed components are PICSY terminals, associated copiers, and SPING monitor panel. (Reference Figure 8.2.)

8.1.3.2 Fire Protection

Smoke detection and automatic pre-action sprinkler system are provided.

8.1.3.3 Structural Design Criteria

The TSC is part of the control structure that is a Seismic Category I structure, as defined in NRC Regulatory Guide 1.29. It is designed in accordance with Chapter 3.0 of the FSAR.

* Letter dated February 25, 2002 from Samuel J. Collins, Director, Office of Nuclear Reactor Regulations, to Robert G. Byram, Senior Vice President and Chief Nuclear Officer. Subject: Issuance of Order for Interim Safeguards and Security Compensatory Measures for – Susquehanna Steam Electric Station, Units 1 & 2.

8.1.3.4 Habitability

8.1.3.4.1 Post-Accident Radiation Doses

8.1.3.4.1.a Allowable

TSC personnel are protected from radiological hazards, including direct shine and airborne activities for postulated accident conditions to the same degree as control room personnel. Applicable criteria are specified in General Design Criterion 19, Standard Review Plan NUREG 0800 Section 6.4, and NUREG-0737, Item II.B.2.

8.1.3.4.1.b Postulated

The radiation dose to personnel is the same as the Control Room personnel. The doses from controlling accidents are summarized in Section 15 of the FSAR.

8.1.3.4.1.c Radiation Monitoring

Commercial grade monitors are provided to alarm on high gross gamma radiation dose rates. In addition, airborne radioactivity concentrations are monitored by portable monitors. Iodine detection capability is provided.

8.1.3.4.2 HVAC

The TSC HVAC system is a part of the Control Room HVAC system which is described in FSAR Section 9.4.1.

8.1.3.4.3 Shielding

Shielding is the same as for the Control Room for total dose to occupants from direct shine and airborne. Exposure will not exceed 5 Rem TEDE for the duration of the accident. This is in accordance with General Design Criterion 19, USNRC Standard Review Plan NUREG 0800 Section 6.4, and NUREG-0737, Item II.B.2. Duration of occupancy and method of analysis is the same as for the control room. Access control may need to be applied within five feet of the east wall of the Control Structure (including impacted TSC areas) as described in Emergency Plan position specific procedures.

8.1.3.4.4 Occupant Accommodations

No sleeping accommodations or toilet facilities are provided. Use of the plant's existing facilities at grade level of the control structure for washing and toilet accommodations is available. Self-contained breathing apparatus are available for personnel who are qualified in their use.

8.1.3.5 Communication Links

The TSC communications system is comprised of three telephone networks (ETN, CTN, and FTS), VHF and UHF radios, and the plant PA system. They provide reliable primary and back-up communication links to emergency response facilities on- and off-site.

8.1.3.5.1 Telephones

The TSC uses the CTN system as primary communications with the ETN system available at various locations and the FTS 2001 reserved for federal government agencies.

8.1.3.5.2 Radio

The TSC has a four-channel 450 MHz UHF and a two-channel 150 MHz VHF radio system with digital voice privacy capability. The VHF radio is an emergency backup for communication with LCEMA and CCEMA, and to communicate with the field monitoring teams. The UHF radio provides primary and backup security, emergency, operational and maintenance communication links.

8.1.3.5.3 Public Address System

The PA system is part of the plant PA system. The system provides two way communications at handset stations. Each station may originate and receive communications by switching to either a page channel or to one of five non interfering party line channels.

8.1.3.6 Power Supply

The TSC is part of the existing power block as described in Chapter 8.0 of the FSAR.

8.1.3.7 Instrumentation

The TSC utilizes the same field sensors and signal conditioning equipment that is provided to monitor plant systems. TSC instrumentation is identical to the field instrumentation used to operate the plant. A detailed description of this instrumentation is provided in Chapter 7.0 of the FSAR.

8.1.3.8 TSC Data Presentation

The TSC includes human factors engineered man-machine capabilities to allow personnel to determine:

- plant conditions during normal operation
- plant steady-state conditions prior to an accident
- transient conditions producing an initiating event
- plant system dynamic behavior during an accident
- projected behavior and effects of offsite airborne radioactivity releases.

The man-machine interface is provided by the Plant Integrated Computer System (PICSY), located in the TSC. (Reference Figure 8.2.)

8.1.3.9 Records and Documents

The TSC contains up-to-date records and references for use during emergency conditions. (Reference Appendix D.) Records are updated and managed by DCS utilizing Plant Administrative Procedures.

8.1.3.10 Security

The TSC is located within a plant vital area and is subject to the vital area access controls as identified in the Security Plan.

8.2 SUSQUEHANNA OFF-SITE EMERGENCY CENTERS

8.2.1 Joint Information Center

For a Notification of Unusual Event, the Susquehanna Energy Information Center, located on U.S. Route 11, is utilized as the Joint Information Center. For other event classifications, the East Mountain Business Center, Plains Township, will be activated as the Joint Information Center.

8.2.2 Emergency Operations Facility

The EOF is an emergency response facility that provides continuous management of Susquehanna activities during radiological emergencies that may have offsite impact.

The EOF is located on East Mountain Boulevard in Plains Township, off PA Route 115 five miles north of exit 105 of the Northeast Extension of the Pennsylvania Turnpike and one mile south of exit 170A of Interstate 81. As the EOF is located beyond 10 miles from the site, the NRC Commission approval was required prior to the relocation. This was granted April 17, 1996 (see REFERENCES, Section 3.19).

The non-emergency activities of the EOF are such that its main function is not degraded.

8.2.2.1 Architecture

The EOF is a one-story, rectangular structure. The building was constructed using standard building codes.

8.2.2.1.1 Spatial Layout Description

Reference Figure 8.3.

8.2.2.1.2 Fire Protection

Automatic wet pipe sprinklers are provided throughout the building.

8.2.2.2 Structural Classification

The EOF is classified as a structure, the failure of which would not result in release of significant radioactivity, and is not required for reactor shutdown. This structure is classified as Non-Category I.

8.2.2.3 Habitability

The EOF is located outside the EPZ; therefore, no special habitability needs are required.

8.2.2.4 Communications

The EOF communications system is comprised of three telephone networks (ETN, CTN, and FTS), VHF radios, and a PA system. They provide a reliable primary and back-up communications network.

8.2.2.4.1 Telephones

The EOF uses a combination of the CTN and ETN systems with the FTS system available for federal governmental agencies. Cellular telephones may also be used as needed.

8.2.2.4.2 Radio

The EOF has a two-channel 150 MHz VHF radio system that is used as an emergency backup to the telephone system to communicate with the field monitoring teams, the TSC, CCEMA, and LCCEMA.

8.2.2.5 Power Reliability

Power is supplied to the EOF via two independent underground power lines that supply the industrial park complex. Upon experiencing a loss of power from the normal supply, a diesel generator starts and supplies power to the building.

8.2.2.6 EOF Data Presentation

The EOF includes human factors engineered man-machine interface capabilities to allow personnel to:

- access environmental conditions
- coordinate radiological monitoring activities
- recommend implementation of off-site emergency plans
- monitor Emergency Response Data System

8.2.2.7 Records and Documents

The EOF contains up-to-date references and records. Documents are managed by DCS using plant administrative procedures.

8.2.2.8 Security

EOF access during an emergency is limited to authorized personnel. Intrusion detection devices monitor the EOF during unoccupied periods.

8.2.3 Alternate Operations Support Center (OSC)

The alternate OSC is accessible even if the site is under threat of or experiencing hostile action since it is located within the Emergency Operations Facility. It functions as a staging area for OSC staff and has the capability for communication with the emergency operations facility, control room, and plant security. The alternate OSC provides the OSC staff with the capability for damage control team planning and preparation when the primary OSC and backup OSC cannot be safely accessed during hostile action.

8.2.4 Alternate Technical Support Center (TSC)

The alternate TSC is accessible even if the site is under threat of or experiencing hostile action since it is located within the Emergency Operations Facility. It functions as a staging area for TSC staff and has the capability for communication with the emergency operations facility, control room, and plant security. The alternate TSC provides the TSC staff with the capability to perform offsite notifications and for engineering assessment activities when the primary TSC cannot be safely accessed during hostile action.

8.3 COUNTY AND STATE EMERGENCY CENTERS

8.3.1 County Emergency Centers

Both LCEMA and CCEMA have EOCs that meet or exceed the minimum Federal criteria for sufficient space, communications, warning systems, self-sufficiency in supplies and accommodations and radiological protection factor. Both counties maintain full-time employees, providing 24-hour per day coverage either at their EOC or their "911" Centers, to coordinate emergency planning and evaluation. "CTN" telephone connections exist between SSES and each County EOC.

Location of the county EOCs:

- Luzerne County
Emergency Management Building
Wilkes-Barre, Pennsylvania
- Columbia County
Columbia County Courthouse 911 Annex
Bloomsburg, Pennsylvania

8.3.2 State Emergency Center

The State EOC is located at the PEMA headquarters, located on Interstate Drive, one mile north of the Progress Avenue exit on Interstate 81. This center is equipped with a reliable communications system that includes "CTN" telephone connections between the EOC and SSES, and ties to all area and county EOCs. During an emergency, representatives from appropriate State agencies will assemble at the State EOC to manage and support the emergency response activities. Facilities are also available at the EOF for PEMA personnel.

8.4 ASSESSMENT CAPABILITIES

8.4.1 Radiation Monitoring System

This on-site system, consisting of ARMs, CAMs, and process monitors, contributes to personnel protection, equipment monitoring and accident assessment by measuring and recording radiation levels and concentrations at selected locations throughout the station. Reference Appendix D.

8.4.2 Fire Protection

Fire protection at SSES is provided by a network of fire detection, suppression, and extinguishing systems. These systems and associated fire alarms are activated by a variety of fire and smoke detection devices throughout the plant. Types of detectors include combustion product, smoke, thermal, and flame. For more detail, reference the SSES Fire Protection Review Report.

8.4.3 Natural Phenomena Monitors

Monitors are provided for detecting and recording natural phenomena events that could result in plant damage due to ground motion or structural vibration. Reference Appendix D.

8.4.4 Environmental Monitoring

This program establishes the pre-operational background levels, detects any gradual buildup of long-lived radionuclides, and verifies that operation of the plant has no detrimental effect on the health and safety of the public or the environment. Reference Appendix D.

8.4.5 Radiological Monitoring Team Equipment

Reference Appendix D.

8.5 PROTECTIVE FACILITIES

8.5.1 Control Room

Protective features (Reference the SSES FSAR):

- a. Adequate shielding by concrete walls.
- b. CREOASS.
- c. ARM system indications.
- d. Emergency and essential lighting and power.
- e. Basic protection equipment for emergency teams (Appendix D), and listings/locations of additional emergency supplies/equipment.
- f. Communications systems.

8.5.2 Station Accountability Areas

Specific locations are designated for accountability of all station personnel. They are located on the basis of logical access routes and physical separation from likely areas of radiation and/or airborne radioactivity.

8.5.3 Remote Assembly Areas

Upon declaration of a Site Evacuation, the ED may send personnel to their homes or to Remote Assembly Areas. These areas are designated for assembly of personnel who can be used to augment the plant staff. Locations were selected on the basis of:

- a. Space availability for all personnel who may be within the exclusion area at the time of an evacuation.
- b. Assurance of a controlled area for contamination surveys and for possible establishment of decontamination stations.

8.5.4 Alert Notification System

An ANS consisting of sirens with ratings of 121 dB at 100' exists within the ten-mile EPZ around SSES. Siren location was determined by a detailed study including field surveys, actual determination of average background noise level, and consideration of population distribution within the 10-mile EPZ.

Activation of the ANS is via radio control from either the LCEMA Emergency Operations Center or CCEMA Emergency Operations Center. A back-up satellite system can also activate the sirens from LCEMA or CCEMA. A redundant control station located at SSES and the EOF has full radio control capabilities, and will be used for the purpose of testing and maintenance activities. Direct Current (DC) batteries provide a back-up source of power to the normal Alternating Current (AC) supply. The Nuclear Emergency Alert signal is a 3 minute steady tone. Public response to this signal is to proceed indoors and tune their radio or television to the Emergency Alert System Network serving their local area for additional information.

Testing of the system takes place annually and includes verification of the system's ability to alert the general public.

8.6 ADDITIONAL COMMUNICATIONS SYSTEMS

8.6.1 Commercial Telephone System

Two independent telecommunications networks exist to provide primary and backup telephone communications between ERFs and offsite agencies. These systems are the Centrex Telephone Network (CTN) and Electronic Tandem Network (ETN).

CTN extension locations include: Control Room, TSC, EOF, JIC, SEIC, DEP/BRP, PEMA, LCEMA, and CCEMA. This is the primary system for emergency communications.

8.6.2 Plant Emergency Alarm System

A plant emergency alarm system provides audible warning of emergency conditions to plant personnel. The system consists of a multi-tone generator, tone selector switch, area selector switch, and message tape recorder. The Emergency Alarm System is integral to the PA System and is powered via the Vital AC UPS. The Plant Emergency Alarm System is tested at least weekly.

8.7 ON-SITE FIRST AID AND MEDICAL FACILITIES

A first aid treatment facility, equipped with normal industrial first aid supplies, is located on the first floor of the S&A Building. Standard first aid kits are at designated locations throughout the station. Inventories are performed regularly.

8.8 DAMAGE CONTROL EQUIPMENT

Damage control equipment consists of normal and special purpose tools and devices used for maintenance functions throughout the station. The ED has access to keys for maintenance tool cribs, shops and other locations where damage control equipment is stored. Inventories are performed regularly.

8.9 INFORMATION SYSTEMS

8.9.1 Plant Integrated Computer System

The PICSY is used for emergency data configuration for the following reasons:

- It contains graphic and trending capabilities.
- It provides for historical data recording and retrieval.
- It has flexibility to permit interfacing to additional I/O equipment and other sources of data.
- Its design provides for a high degree of reliability.
- It is capable of scanning and processing all of the data needed in the EOF and TSC.
- It is located in a secure area within the control structure.
- It has a redundant system design.
- The ERDS and SPDS functions are integrated into its design.
- All of the PICSY data and functions are easily made available at locations remote from SSES.

8.9.1.1 Data Acquisition

Data is acquired from I/O hardware in the plant as well as over data interfaces to various other plant equipment. All data is checked for validity and errors before being displayed to the user. Isolation is applied to all safety-related inputs. All data is archived. Both short term and long term data are available for retrieval at any PICSY SDS. Long term data is available for at least the previous fuel cycle.

8.9.1.2 Data Preparation

Display formats needed by the ERF are generated and stored within the PCS using standard proven PICSY software. A configuration management software system is employed to track changes to all formats and the database itself.

Proven system and application software has been developed which performs data display and system security. The database includes raw data, data converted to engineering units, data checked on a real-time basis, and various types of calculated data.

User interaction from the PICSY SDS is independent from each station and controlled by multiple copies of the identical software.

8.9.1.3 Data Presentation

Three SDSs are available in the TSC for display of Unit 1, Unit 2, and Common data. Procedures and methods for call-up and error indications of TSC function are identical to those used in the control room with one exception. Control Room monitors are usually fitted with touch screens in lieu of track balls and keyboards.

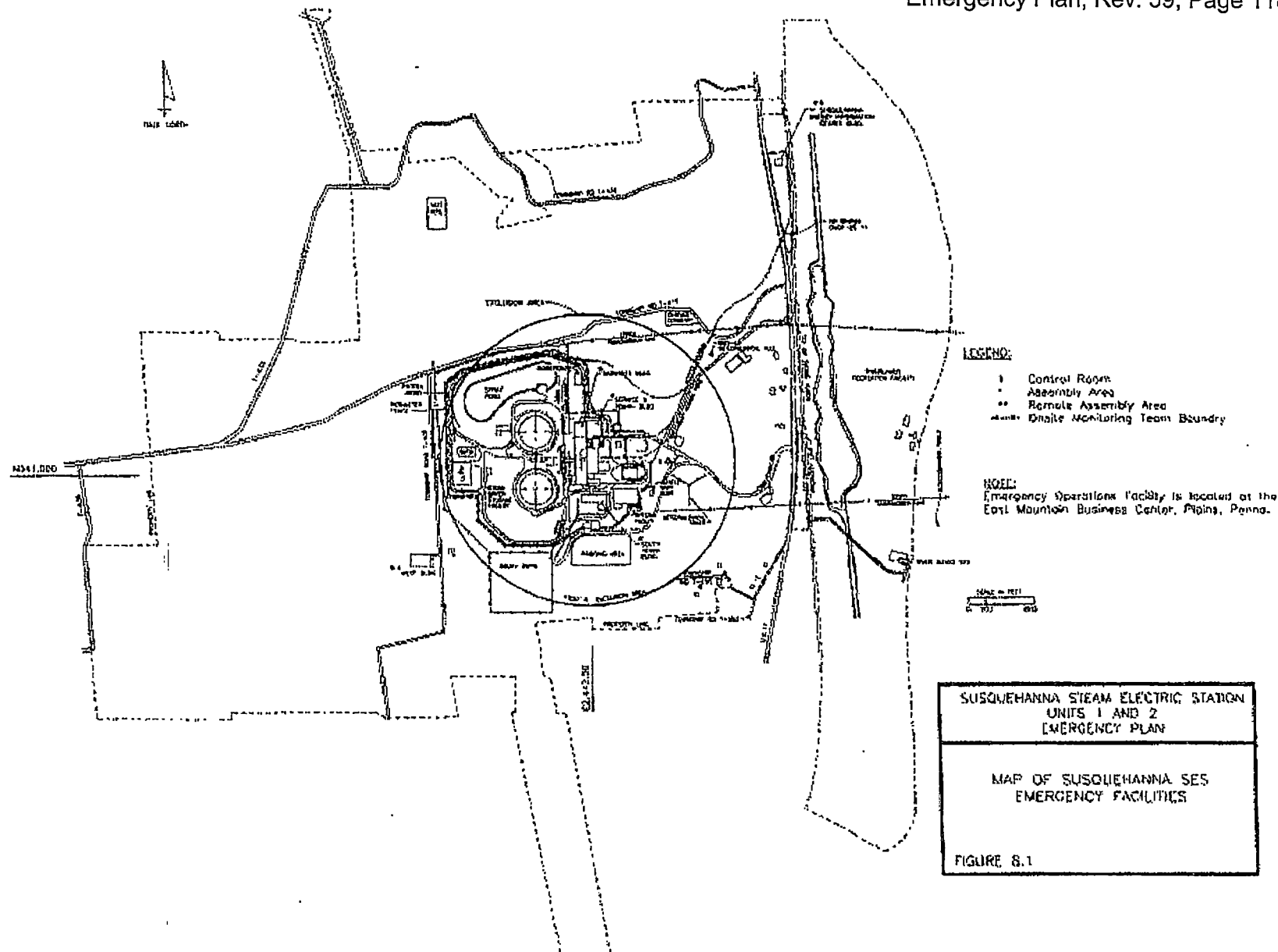
Data is presented in formats that are easy to understand and interpret. Variables not in a normal condition are presented with an indication of that condition. Alarms are represented by using the same color coding techniques as in the control room. Output formats are designed according to human factors engineering criteria, and include pattern and coding techniques.

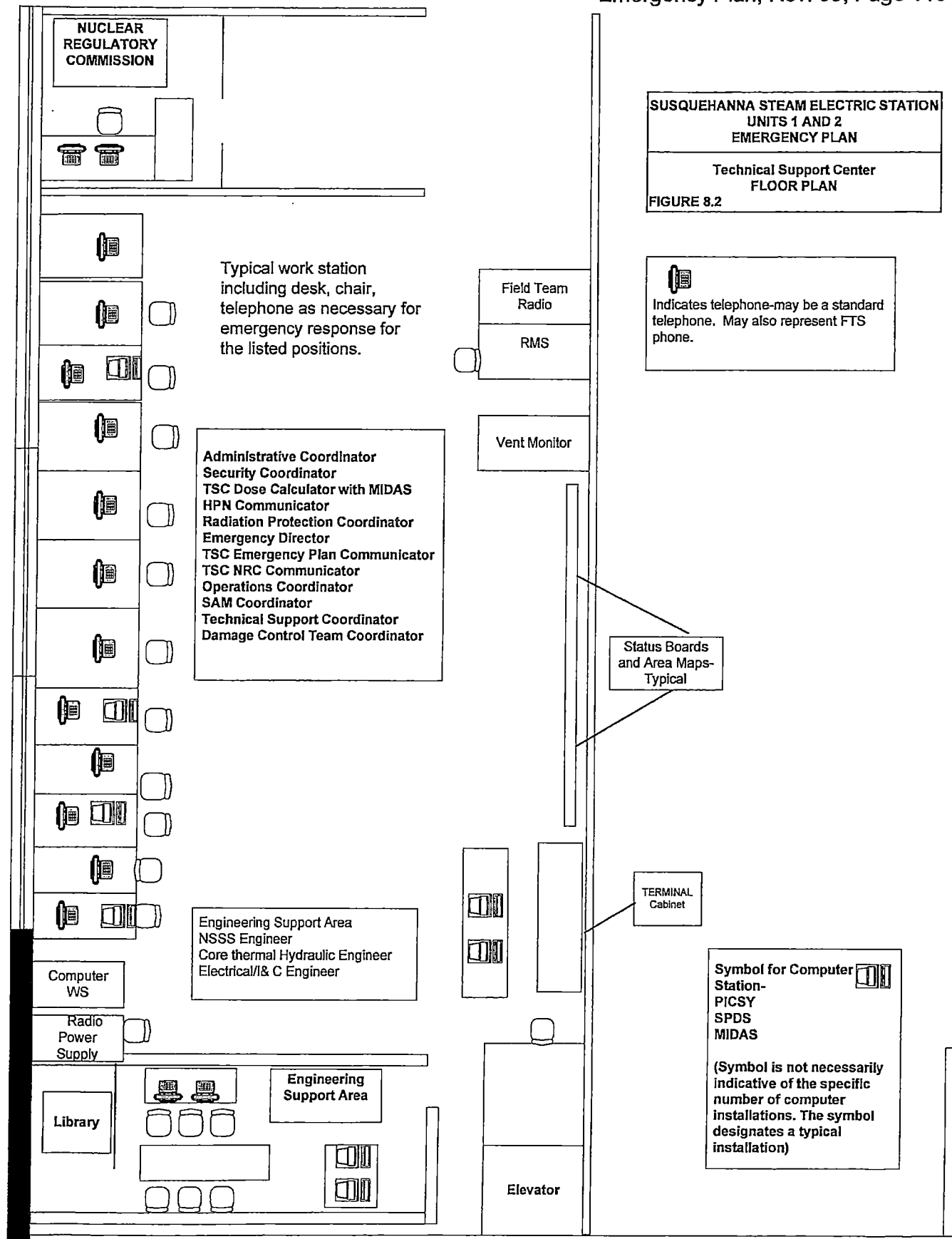
8.9.1.4 Availability

A minimum system availability of 99% or greater can be expected, based on analytical calculations.

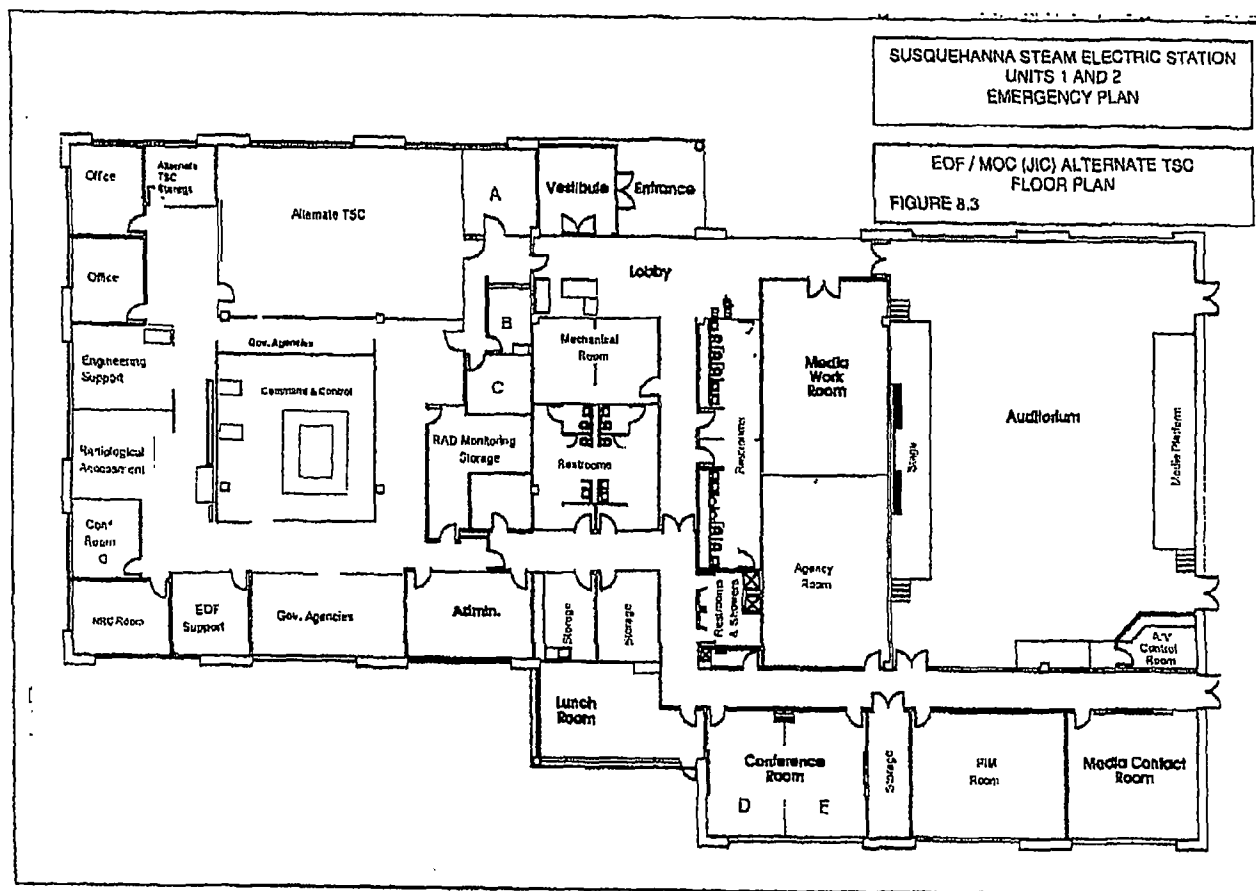
TABLE 8.1**RELATIONSHIP OF THE PRIMARY PARAMETER,
SECONDARY DISPLAY, AND ALGORITHMS
ON SPDS**

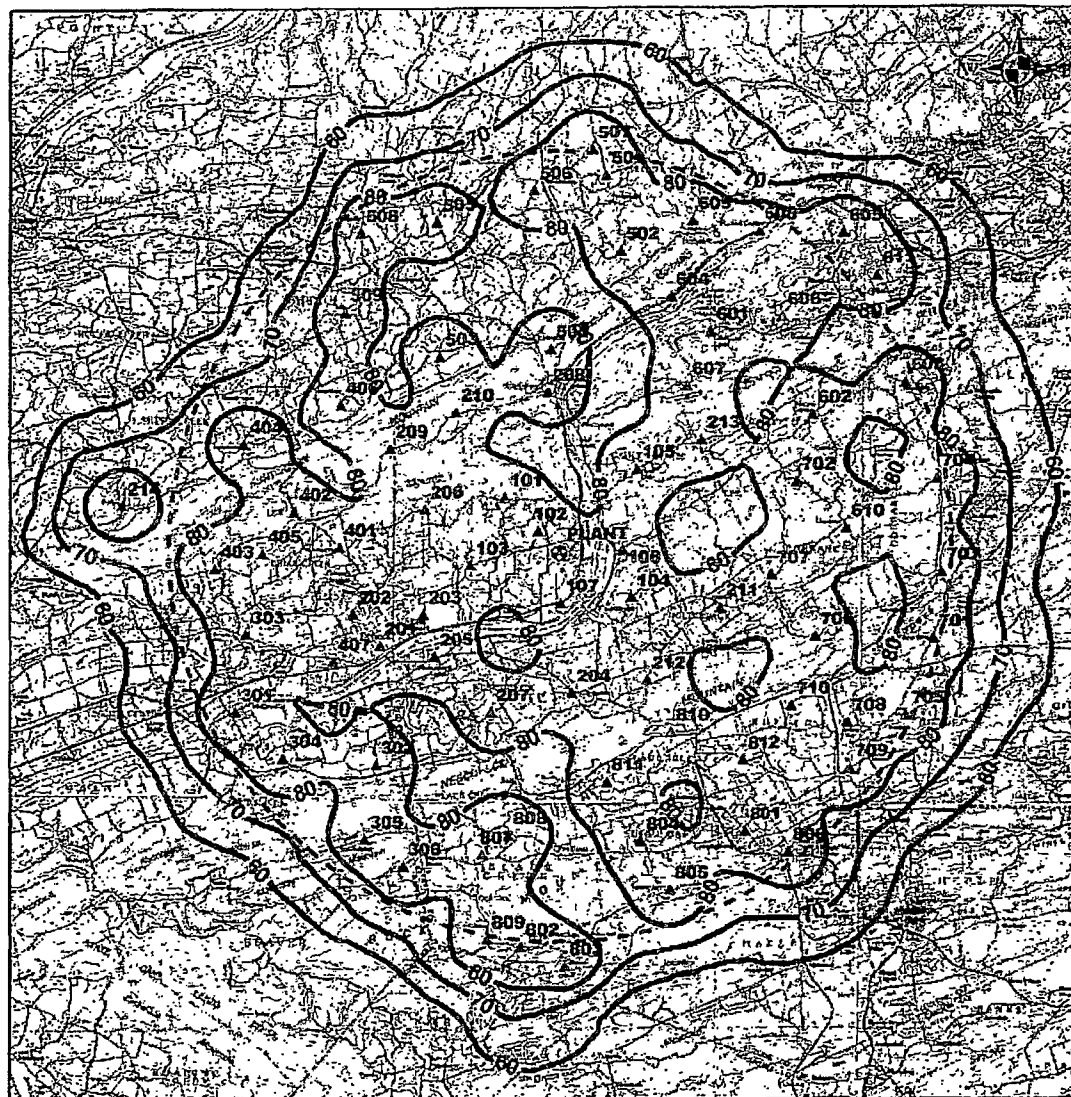
Primary Parameter	Secondary Display	Algorithm
Reactor Power	1. Reactor Core Status	a. Reactivity Monitoring b. Core Flow c. Core Spray
Reactor Water Level	1. Reactor Water Level History	a. Reactor Water Level
Reactor Pressure	1. Reactor Pressure History 2. S/R Valve Lifts	a. Reactor Pressure a. S/RV Positions (non-ADS)
Drywell Pressure	1. Drywell Pressure and Temperature History 2. Containment Status 3. Containment Hydrogen/Oxygen Limits	a. Drywell Pressure b. Drywell Temperature a. Suppression Pool Water Level b. Suppression Chamber Pressure c. Suppression Pool Water Temperature d. Suppression Chamber Atmosphere Temperature e. S/RV Positions (ADS) a. Containment Atmosphere Control
Noble Gas Effluent Release	1. Radioactive Effluent Release 2. Containment Isolation	a. Off-Gas Pretreatment b. Primary Containment Activity c. Reactor Building Vent d. Turbine Building Vent e. Liquid Effluent f. Standby Gas Treatment a. Containment Isolation





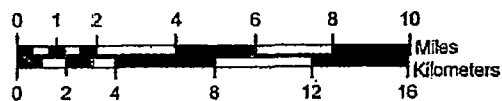
East Mountain Business Center / Floor Plan EOF/JIC





Susquehanna OVPM 2008-09

Prepared for: American Signal Corporation



Legend

- 10 Mile Radius
- Plant
- ASC T-121
- OVPM Contours

SUSQUEHANNA STEAM ELECTRIC STATION
Units 1 and 2
EMERGENCY PLAN
SIREN LOCATION
Figure 8.4

9.0 MAINTAINING EMERGENCY PREPAREDNESS

9.1 ORGANIZATIONAL PREPAREDNESS

9.1.1 Training

- a. All unescorted personnel entering or working within the SSES Radiologically Controlled Area receive as a minimum, the following instruction:
 - Appropriate portions of the SSES EP.
 - Use of emergency facilities and equipment, familiarization with station alarms and personnel response, and station communications systems.
 - Personnel accountability, evacuation, and radiation exposure criteria.
 - Radiation protection, emphasizing protective clothing, equipment, and personnel dosimetry.
- b. Those individuals working on the SSES site, inside the protected area, but outside the Radiologically Controlled Area, are provided with instructions on warning signals, accountability areas, and evacuation routes.
- c. Personnel assigned to the Susquehanna ERO receive specialized training for their respective assignments. (Reference Table 9.1)
- d. PEMA conducts a training program throughout the State and assists the counties in developing training policy for disaster operational readiness. The county and local EMAs are responsible for planning and conducting disaster preparedness training of respective emergency response personnel. Susquehanna works closely with PEMA and the county EMAs in coordinating training programs. In addition, orientation training for State and county agencies and personnel involved in SSES emergency planning efforts is made available by Susquehanna.
- e. Annually, DEP/BRP and state, county, and municipal EMAs are invited to participate in a training program conducted by Susquehanna. The initial training program relates the importance of emergency planning and the interface between the Susquehanna and offsite emergency organizations with an emphasis on classification; EALs; reporting requirements; assessment, protective, and corrective actions; and communications networks. In addition, DEP/BRP is offered a specific review of dose calculations/projections, protective actions guides, and reportable information.

- f. The State Police, annually, are invited to participate in a training program on appropriate EP-PSs, with emphasis on the classification of emergencies, communications, and specific areas of responsibility.
- g. Susquehanna provides training annually to local off-site support organizations. These local organizations are encouraged to become familiar with the SSES, key station personnel, and are invited to attend training conducted by or for Susquehanna.

Initial core training for local fire companies and ambulance associations includes:

- Interface with the Site Security Force
- Basic health physics indoctrination and training
- SSES facility layout

Fire companies also receive training in the following areas:

- On-site fire protection system equipment
- Differences between on-site firefighting equipment and fire company supplied equipment
- Communications system
- Review of sections of the SSES EP and EP-PSs
- The on-site ERO with emphasis on the interface between the SSES fire brigade and fire company personnel

- h. Personnel assigned to the Emergency Planning Organization receive training as required by EP administrative procedures. Emergency Planning experience may be used in lieu of training.

Each year a fire drill, which includes local fire company support, is held to test these areas.

Annually local ambulance associations are invited to attend specialized training regarding the handling of contaminated/injured victims.

9.1.2 Drills and Exercises

Each drill or exercise is conducted to: (1) ensure that the participants are familiar with their respective duties and responsibilities, (2) verify the adequacy of the SSES EP procedures, (3) test communications networks and systems, (4) determine availability and operability of emergency supplies and equipment, and (5) every two years verify the adequacy of off-site agency plans.

Drills and exercises are conducted to simulate actual emergency conditions as closely as possible and may be scheduled such that more than one type of the following drills or exercises can be conducted simultaneously to meet the guidance of NUREG-0654 and the requirements of 10CFR50:

- Annual medical drill involving offsite support
- Annual fire drill involving offsite support
- Annual radiological drill to site area or general emergency level with offsite participation biennially
- Annual full-scale ANS test
- Annual environmental monitoring drill
- Semi-annual Health Physics drill testing survey sampling and analysis techniques
- Annual drill that tests ability to obtain and analyze a post accident coolant sample
- Perform augmentation exercise every eight years
- Hostile Action Based exercise every eight years

Additional non-integrated drills and tests are conducted as follows:

- Bi-weekly Silent Tests for sirens
- Quarterly Growl Tests for sirens
- Quarterly fire drills
- Monthly communications drills with state and county agencies
- Monthly communications tests with the NRC

Drill scenarios for major drills are prepared to involve participation of several emergency teams and all or specific parts of the ERO including varying degrees of participation of State, County, and Federal agencies and local off-site support organizations.

Following the conduct of drills, critiques are held to clearly identify deficiencies and action plans for resolution. Procedures are established to assure the timely implementation of corrective actions.

Ingestion pathway exercises are conducted by the offsite agencies in accordance with PEMA Annex E. Susquehanna Steam Electric Station personnel provide support as required.

9.1.3 Overall Coordination of Nuclear Emergency Preparedness

The Manager-Emergency Preparedness is responsible for the overall coordination of all nuclear emergency planning activities. The Manager-Emergency Preparedness is assisted in this effort by: the Plant Manager for activities involving the Susquehanna Site, the General Manager-Nuclear Engineering for engineering issues, the Manager-Nuclear Training for on-site training, the Community Relations Manager-Susquehanna for communications with the public and news media, and the Manager-Nuclear Oversight for audits of Emergency Planning.

The Manager-Emergency Preparedness is typically responsible for:

- Revising of the SSES Emergency Plan
- Revising of EP-PSs and other Emergency Planning Administrative procedures
- Conducting of integrated drills and exercises and communication drills
- Defining EP training scope for ERO
- Defining EOF and JIC EP Training
- Coordinating EP interface between State and Federal agencies
- Coordinating maintenance and testing of ANS
- Coordinating interface between state, county, municipal, and Susquehanna ERO
- Assuring operational readiness of Emergency Response Facilities

9.2 REVIEW AND UPDATING

9.2.1 SSES Emergency Plan

The Manager-Emergency Preparedness is responsible for the review and revision of the SSES Emergency Plan, ensuring:

- A review of the SSES Emergency Preparedness Program is performed periodically by persons who have no direct responsibility for implementation of the program in accordance with 10CFR50.54t.
- Annual review of the SSES Emergency Plan.
- Annual review of Letters of Agreement.
- Recommendation of Emergency Plan changes to PORC.
- PORC review of Emergency Plan changes and submission of changes to NSRB.
- Revisions or a report of change to the Emergency Plan that do not change the effectiveness of the plan are submitted to the NRC within 30 days from the implementation of such change(s).
- Perform an annual review of the Evacuation Time Estimate (ETE) to ensure 10CFR50 Appendix E Section IV and NUREG 0654 Element J.8 requirements are maintained. Update the full ETE should the criteria from Appendix E be met and re-submit the ETE to the NRC.

9.2.2 Emergency Plan Procedures

The Manager-Emergency Preparedness is responsible for the review and revision(s) of the Emergency Plan Procedures, ensuring:

- The periodic review is accomplished in accordance with established plant procedures.
- Revisions to procedures are done in accordance with established plant procedures.
- Controlled copies of procedure revisions are issued by station document control programs.
- ERO personnel are briefed on revisions as required.

9.3 MAINTENANCE AND INVENTORY OF EMERGENCY EQUIPMENT/SUPPLIES

The Manager-Emergency Preparedness is responsible for periodic inventory and inspection of emergency equipment and supplies, and for periodic testing of emergency communications systems. This testing includes verification of phone numbers that are contained in Emergency Plan procedures.

Equipment, supplies, and parts having limited shelf lives are checked and replaced as necessary. Monthly communications drills and tests are also conducted from Susquehanna ERFs and offsite agencies.

Any deficiencies found during these activities are either cleared immediately or documented for corrective action.

9.4 PUBLIC EDUCATION AND INFORMATION

Under the direction of the Manager-Emergency Preparedness, the following methods are utilized to ensure that emergency planning information and education is provided and transmitted to residents and transients in the EPZ annually.

9.4.1 Telephone Directory Inserts

With the cooperation of Pennsylvania Emergency Management Agency, Luzerne County Emergency Management Agency, and Columbia County Emergency Management Agency, emergency information is provided in all telephone directories distributed within the ten mile EPZ. This information includes:

- explanation of Emergency Classifications
- what to do when you hear the sirens
- public Protective Actions
- student pick-up points
- evacuation routes to reception centers
- evacuation Plan Map
- callback number for special needs

9.4.2 Programs are Offered to Acquaint the News Media With:

- SSES Emergency Plan
- information concerning radiation
- points of contact for the release of public information during an emergency

9.4.3 Educational Training Programs

Educational training programs on emergency preparedness are made available to the general public through the staffs of the Susquehanna Energy Information Center and Nuclear Emergency Preparedness.

TABLE 9.1

Emergency Plan, Rev. 59, Page 128 of 313

TRAINING OF SUSQUEHANNA SES EMERGENCY RESPONSE PERSONNEL

Personnel Category	Involved Personnel	Initial Training and Periodic Retraining
1. Emergency Directors	Shift Managers, and currently assigned Emergency Directors	Initial training: EP and EP PSs. Retraining: Changes in responsibilities. Frequency: Annual
2. Personnel responsible for accident assessment/management	Emergency Director; Emergency Coordinators, Recovery Manager, Dose Assessment Personnel	Initial training: EP and EP PSs. Retraining: Applicable EP PSs and changes. Frequency: Annual
3. Radiation Monitoring Teams	Health Physics Supervision; Health Physics Technicians; and Site Personnel	Initial training: Radiation monitoring EP PSs and applicable Health Physics Procedures Retraining: Hands-on instrument usage. Frequency: Annual
4. Fire Brigade	Unit Supervisors - Fire Brigade Leader, Effluents personnel - Fire Brigade Members	Training and retraining are outlined in the SSES Fire Protection Review Report.
5. Damage Control Teams	Non-Licensed Operators; Maintenance Supervision; Maintenance Personnel; Health Physics Technicians; I&C Supervision; I&C Personnel	Repair and Damage Control are a normal part of the job functions. Initial training: Availability of damage control equipment, use of communication systems, and interfaces with other emergency teams. Retraining: Review of the above topics. Frequency: Annual

TABLE 9.1

Emergency Plan, Rev. 59, Page 129 of 313

TRAINING OF SUSQUEHANNA SES EMERGENCY RESPONSE PERSONNEL

Personnel Category	Involved Personnel	Initial Training and Periodic Retraining
6. First Aid and Rescue Personnel (Emergency Medical Response Teams)	Work Groups having 24-hour coverage at Susquehanna: (supplemental team members directed by Team Leader) Security Force Members Non-Licensed Operators Health Physics Chemistry Effluents	Training and retraining: Communication system and interfaces with local medical support personnel. Training and retraining: First Aid, CPR Training, and availability of on-site medical treatment supplies and equipment; (see Note) Training and retraining: CPR Training and radiological hazards (see Note) Training and retraining: CPR Training (see Note) Retraining frequency: Annual
7. Fire Support Personnel	Local Fire Companies	Training and retraining are outlined in Section 9 of the SSES EP.
8. Medical Support Personnel	Berwick Hospital Staff; Ambulance Companies; Geisinger Medical Center Staff	Initial training: Treatment and handling of contaminated/injured personnel, communication systems, radiological hazards and interfaces with SSES personnel. Retraining: Review of the above topics. Retraining frequency: Annual
9. Corporate Support Personnel	Corporate Management Personnel; including Nuclear Fuel and Analysis, Nuclear Design Engineering and Technology	Initial training: EP and appropriate EP PS's. Retraining: Applicable EP-PSs and changes. Retraining frequency: Annual
10. Security Personnel	Security Supervision; Security Force Members	Training is outlined in the SSES Training and Qualification Plan.
11. Public Information Personnel	Special Office of the President; Information Services Personnel	Initial training: EP and Public Information EP PS. Retraining: Applicable EP-PSs and changes. Retraining frequency: Annual

NOTE: Specific training requirements are identified in the Training Matrices for Emergency Planning, Security, Health Physics, Chemistry, Operations, Effluents and all ERO members.

APPENDIX A

LETTERS OF AGREEMENT

LETTERS OF AGREEMENT

Letters of Agreement have been established with those State and Local agencies as well as local and industry support service groups that are responsible to ensure a high level of emergency preparedness for the SSES. These agreements have been established to assure all parties are aware of their commitment to SSES and the public in the vicinity of the SSES during an emergency including a HOSTILE ACTION event.

The following list of agencies and support groups have signed letters of agreement:

Agency/Support Group

Berwick Ambulance Association
Berwick Hospital Center
Berwick Volunteer Fire Department
Columbia County Commissioners
Department of Energy
Department of Environmental Protection/Bureau of Radiation Protection
Federal Radiation Monitoring and Assessment Center (FRMAC)
GE BWR Emergency Support
Geisinger Medical Center
Hobbie Volunteer Fire Co. - EMS
Hunlock Creek Ambulance Association
Institute of Nuclear Power Operations
Lackawanna County Commissioners
Latona Trucking
Luzerne County Council
Medico Industries
Mocanaqua Volunteer Fire Company
Nanticoke Fire Department
National Weather Service
Nescopeck Volunteer Ambulance Assoc.
Pennsylvania Emergency Management Agency
Pond Hill-Lily Lake Ambulance Association
PPL Electric Utilities
Salem Township Volunteer Fire Co.
Shickshinny Volunteer Fire Department
Shickshinny Volunteer Ambulance Assoc.
Stell Enterprises
Wilkes Barre Scranton International Airport

These letters of agreement provide for:

- Coordination of planning efforts by State and local agencies; industry support groups; fire ambulance and hospital support services; and Susquehanna.
- Appropriate emergency response to assure employee and public safety during an emergency condition at SSES.
- Mutual notification capabilities.
- Appropriate training and exercising of emergency response capabilities.
- Fire, first aid and medical support.
- Environmental monitoring and assessment support.
- Other emergency support services as deemed necessary

The Manager-Emergency Preparedness is responsible for renewing letters of agreement every year where applicable. In some instances, where the letter of agreement is for a specified duration longer than 1 year, letters need not be renewed until the end of the specified duration. Copies are maintained and controlled within Document Control Services to assure appropriate review and updating takes place.

APPENDIX B

**WIND ROSES,
DOSE/DISTANCE PLOTS AND
JOINT FREQUENCY DISTRIBUTION**

**ORIGINAL DOCUMENT ISSUED 01/1992
SPECIFIC FIGURES MAY HAVE OTHER ISSUE DATES.**

INTERPRETATION OF WIND ROSES

Perhaps the best way to discuss the interpretation is to take a specific example. Let us consider the wind rose for Spring (Figure I). This wind rose represents the average wind conditions at the 10 meter level for a total of 4 Springs (1973-1976). Spring is defined as the months of March, April, and May. Similarly Summer consists of June, July, and August, Autumn is September, October, and November, and Winter is December, January, and February.

In looking at Figure I we see that the winds are most frequently from the West. Thus they will carry plant effluents towards the East. We also see that 11.5% of all the winds are from the West. Winds from the West at speeds of 0-1.5 meters per second (mps) comprise 1.6% of all winds; winds from the West at speeds of 1.5-5.0 mps comprise 6.9% of all winds; winds from the West at speeds of greater than 5 mps comprise 3.0% of all winds.

We can also see that 0.8% of all the winds are calm and therefore are not assigned a direction. In addition the least frequent winds are from the Southeast.

It is also apparent that the lightest winds (0-1.5 mps) most frequently are associated with winds from the East-Northeast and East while the strongest winds (greater than 5 mps) are most frequently associated with winds from the West.

INTERPRETATION OF DOSE/DISTANCE PLOTS

The dose/distance plots have been removed and reference to the use of MIDAS as the approved methodology/tool for determining magnitude of and for continually assessing the impact of the release.

MIDAS has the capability to provide assessments using event-specific fuel damage estimates. Additionally, MIDAS can provide information at additional distances than were provided in the deleted Dose/Distance nomographs. The system performs estimates and predictions of atmospheric effluent transport and diffusion during and immediately following an accidental airborne radioactive release from the facility.

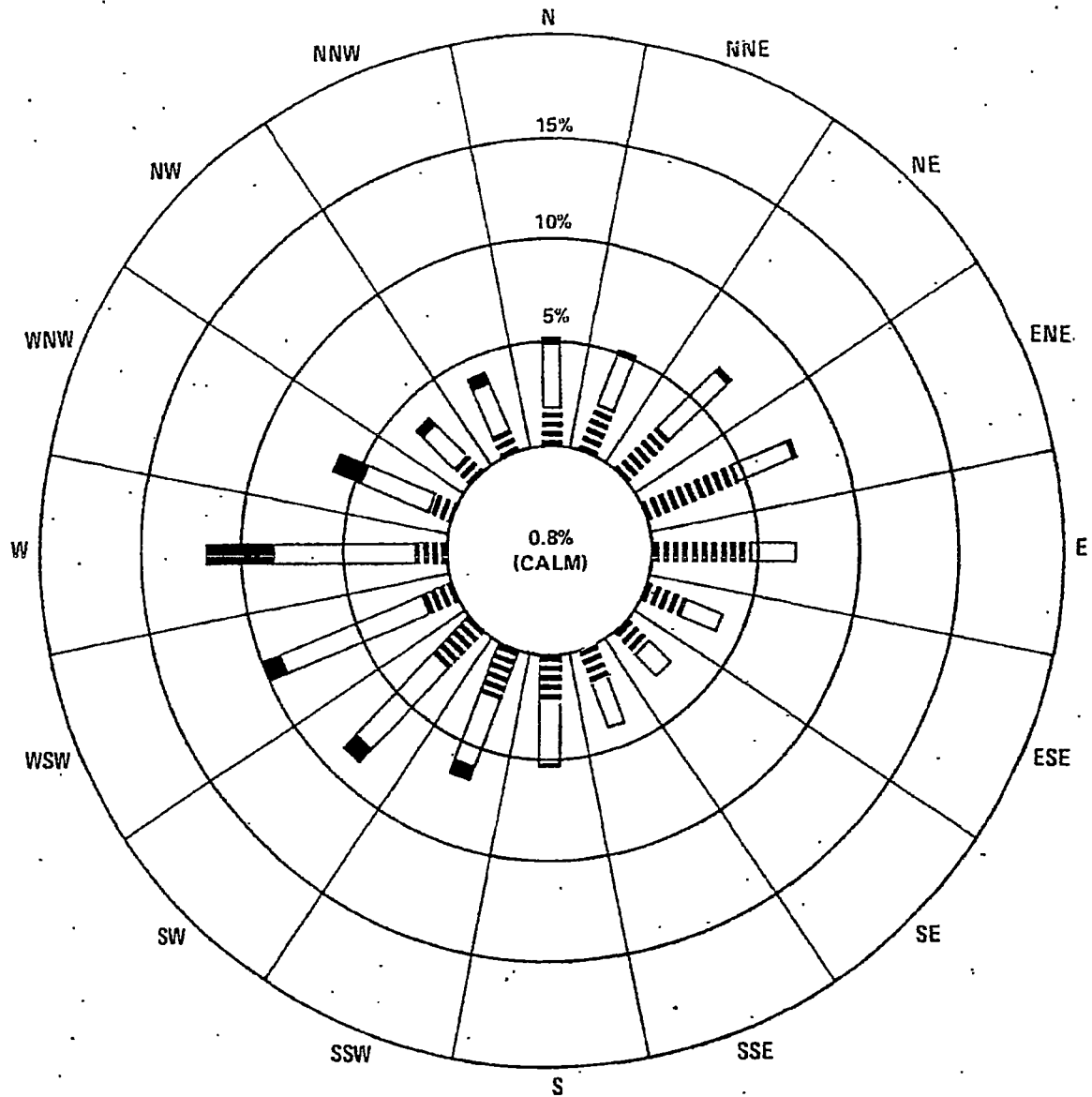
INTERPRETATION OF JOINT FREQUENCY DISTRIBUTION

The data in Tables B-6 through B-13 are from meteorological measurements taken at the Susquehanna site during the time period from 1999 through 2003.

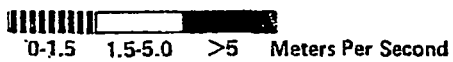
Examples are provided of the way that a joint frequency distribution may be interpreted. The first example relates to the likelihood of a specific stability class occurring on the Susquehanna site. Table B-7 for Stability Class B shows that this Moderately Unstable class occurs about 1363/43823 ($=0.031$) or 3.1% of the time. Table B-9 for Stability Class D shows that this Neutral class occurs about 17841/43823 ($=.407$) or about 40.7% of the time. Looking at all of the information, the reader will see that the more common stability classes that occur at Susquehanna are the D (Neutral) and E (Slightly Stable) stability classes.

The second example relates to the wind speeds that are more common for specific stability classes occurring on the Susquehanna site. Table B-7 for Stability Class B shows that for this Moderately Unstable class, the most common wind speed is in the range from 3.1-5.0 m/s (6.9-11.2 mph), a relatively high wind speed. Table B-10 for Stability Class E shows that for this Slightly Stable class, the most common wind speed is in the range from 1.1-1.5 m/s (2.5-3.4 mph), a relatively lower wind speed.

The third example relates to the wind directions that are more common for the Susquehanna site. The Table B-13 of the Joint Frequency Distribution presents a summary for all stability classes observed at the Susquehanna site. The most common wind direction is ENE, meaning that most commonly, the wind is blowing from the ENE over the Susquehanna site. The second most common wind direction is SW, meaning that next most commonly, the wind is blowing from the SW over the Susquehanna site. As can be seen from review of the table, upriver and downriver winds occur quite commonly at the site.



LEGEND:

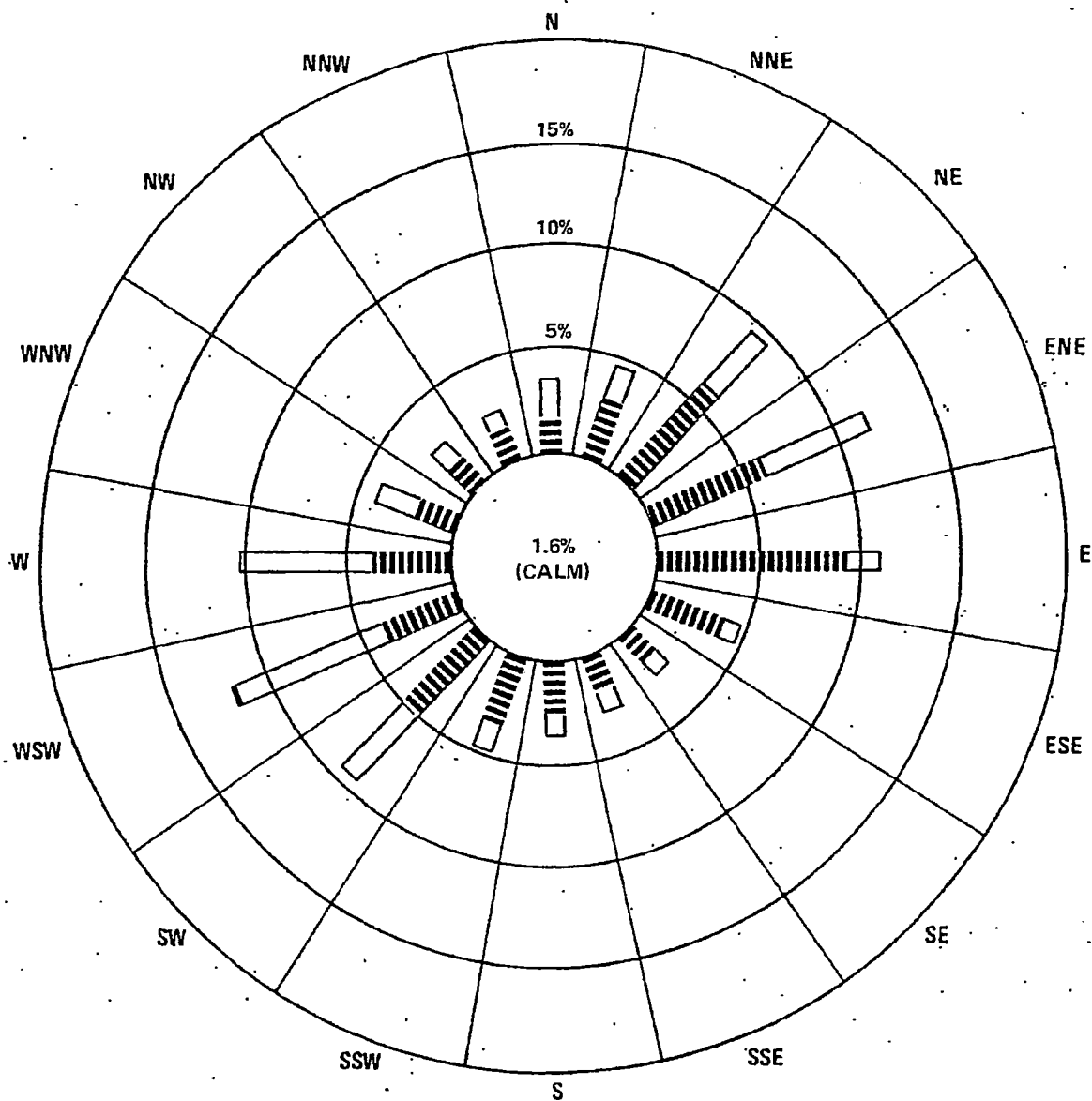


Rev. 11, 10/88

SUSQUEHANNA STEAM ELECTRIC STATION
UNITS 1 AND 2
EMERGENCY PLAN

WIND FREQUENCY DISTRIBUTION
IN PERCENT
PERIOD OF RECORD-1973-1976
(SPRING SEASON)

FIGURE B-1



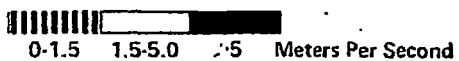
Rev. 11, 10/88

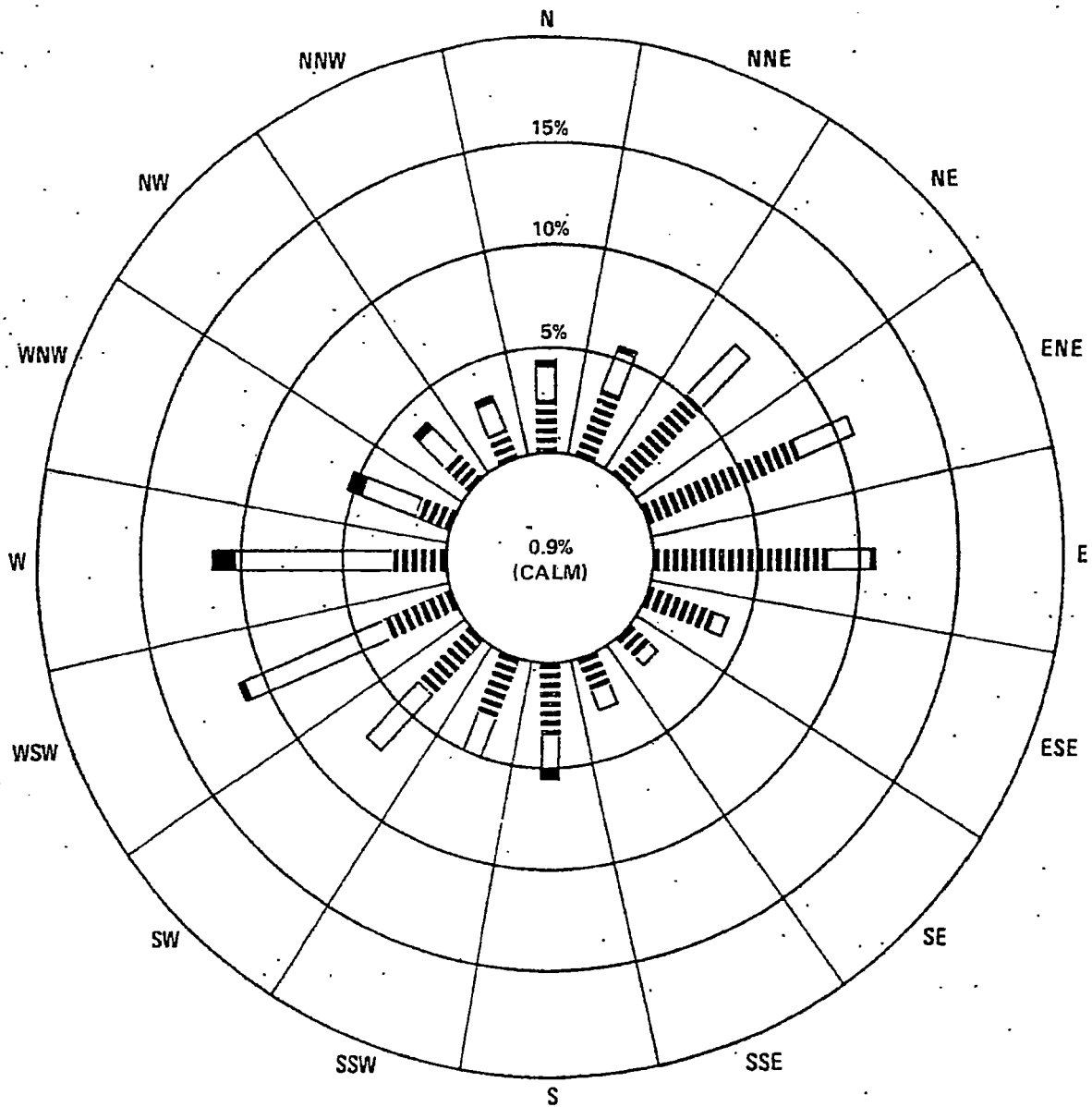
SUSQUEHANNA STEAM ELECTRIC STATION
UNITS 1 AND 2
EMERGENCY PLAN

WIND FREQUENCY DISTRIBUTION
IN PERCENT
PERIOD OF RECORD-1973-1976
(SUMMER SEASON)

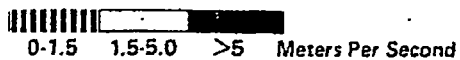
FIGURE B-2.

LEGEND:





LEGEND:

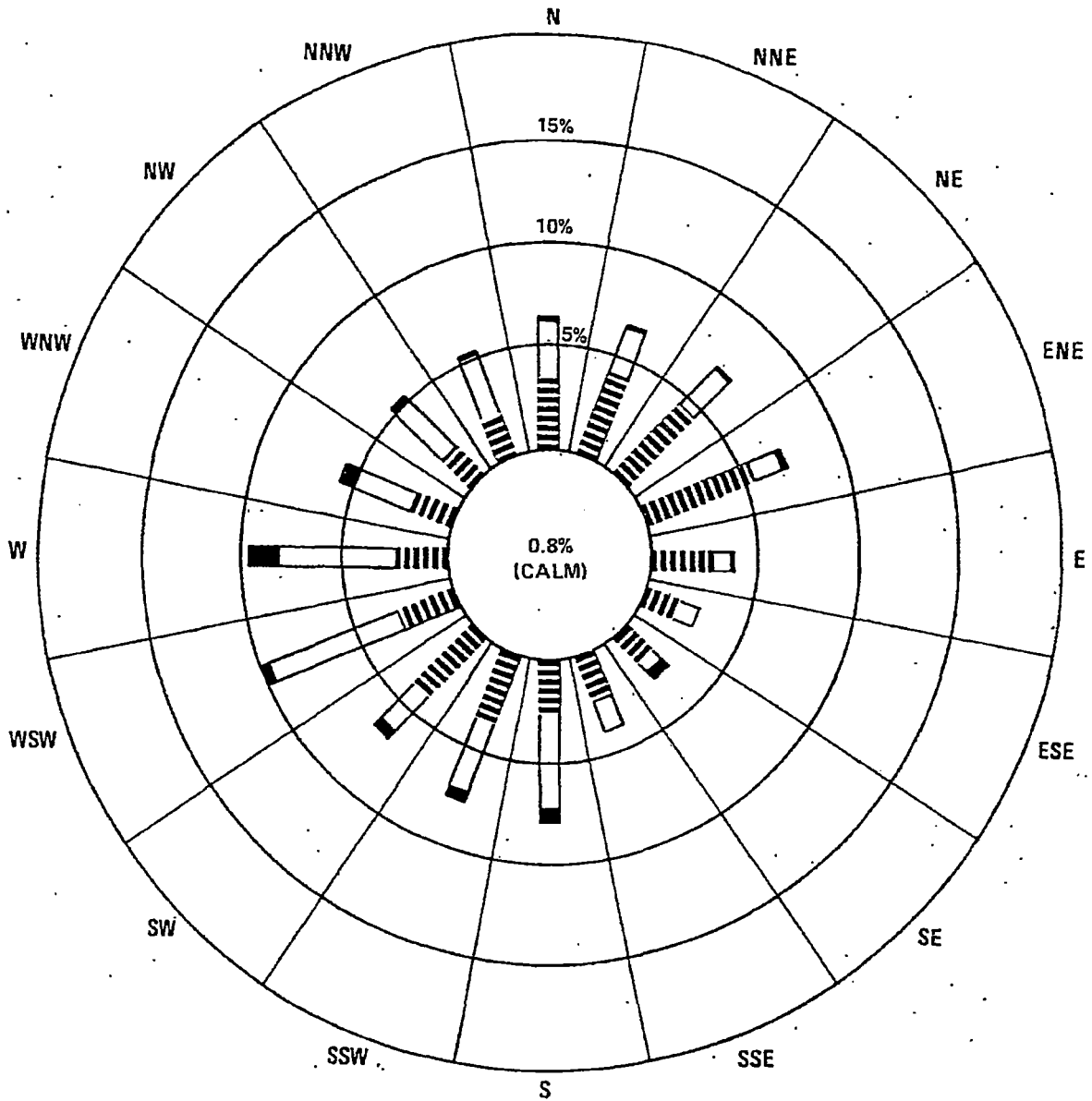


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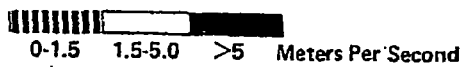
SUSQUEHANNA STEAM ELECTRIC STATION
UNITS 1 AND 2
EMERGENCY PLAN

WIND FREQUENCY DISTRIBUTION
IN PERCENT
PERIOD OF RECORD-1973-1976
(AUTUMN SEASON)

FIGURE B-3



LEGEND:

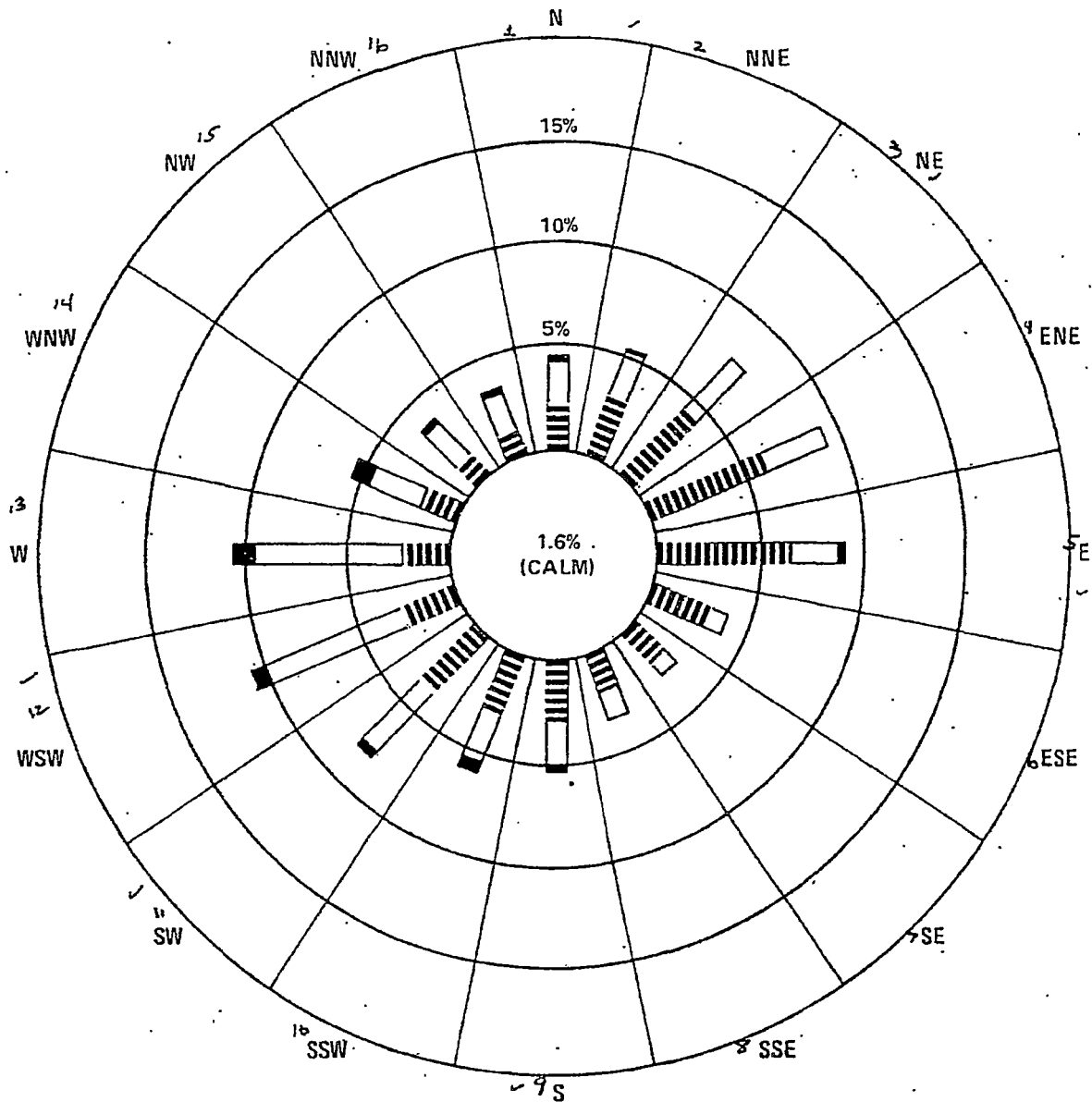


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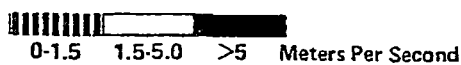
SUSQUEHANNA STEAM ELECTRIC STATION
UNITS 1 AND 2
EMERGENCY PLAN

WIND FREQUENCY DISTRIBUTION
IN PERCENT
PERIOD OF RECORD-1973-1976
(WINTER SEASON)

FIGURE B-4



LEGEND:



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SUSQUEHANNA STEAM ELECTRIC STATION
UNITS 1 AND 2
EMERGENCY PLAN

WIND FREQUENCY DISTRIBUTION
IN PERCENT
PERIOD OF RECORD-1973-1976
(ANNUAL AVERAGE)

FIGURE B-5

Joint Frequency Distribution

Hours at Each Wind Speed and Direction

Period of Record = 01/01/99 1:00 - 12/31/03 23:00 Total Period
 Elevation: Speed: 10M SPD Direction: 10M WD Lapse: DT60-10
 Stability Class: **A** Delta Temperature: Extremely Unstable

<u>Wind Direction from</u>	<u>Wind Speed (m/s)</u>												<u>Total</u>
	<u>0.23- 0.50</u>	<u>0.51- 0.75</u>	<u>0.76- 1.0</u>	<u>1.1- 1.5</u>	<u>1.6- 2.0</u>	<u>2.1- 3.0</u>	<u>3.1- 5.0</u>	<u>5.1- 7.0</u>	<u>7.1- 10.0</u>	<u>10.1- 13.0</u>	<u>13.1- 18.0</u>	<u>> 18.0</u>	
N	1	0	0	2	3	11	28	4	0	0	0	0	49
NNE	0	0	0	3	1	28	58	4	0	0	0	0	94
NE	0	0	0	7	15	45	23	0	0	0	0	0	90
ENE	0	0	1	8	17	11	4	0	0	0	0	0	41
E	0	0	4	26	8	4	1	0	0	0	0	0	43
ESE	0	1	7	12	7	8	6	0	0	0	0	0	41
SE	0	0	2	6	14	33	20	0	0	0	0	0	75
SSE	0	0	2	6	19	36	14	1	0	0	0	0	78
S	0	0	2	10	28	62	63	1	0	0	0	0	166
SSW	0	0	0	12	38	105	88	4	0	0	0	0	247
SW	0	0	1	10	38	177	261	28	1	0	0	0	516
WSW	0	0	0	4	7	29	125	35	2	0	0	0	202
W	0	0	0	1	2	4	48	5	0	0	0	0	60
WNW	0	0	0	1	2	6	12	0	0	0	0	0	21
NW	0	0	0	0	1	0	6	3	0	0	0	0	10
NNW	0	0	0	1	0	1	12	4	0	0	0	0	18
Totals	1	1	19	109	200	560	769	89	3	0	0	0	1751

Number of Calm Hours for this Table 18
 Number of Variable Direction Hours for this Table 0
 Number of Invalid Hours 297
 Number of Valid Hours for this Table 1751
 Total Hours for the Period 43823

SUSQUEHANNA STEAM ELECTRIC STATION
 UNITS 1 AND 2
 EMERGENCY PLAN

JOINT FREQUENCY DISTRIBUTION

FIGURE B-6

Joint Frequency Distribution

Hours at Each Wind Speed and Direction

Period of Record = 01/01/99 1:00- 12/31/03 23:00 Total Period
 Elevation: Speed: 10M SPD Direction: 10M WD Lapse: DT60-10
 Stability Class: B Delta Temperature: Moderately Unstable

Wind Direction from	Wind Speed (m/s)												Total
	0.23- 0.50	0.51- 0.75	0.76- 1.0	1.1- 1.5	1.6- 2.0	2.1- 3.0	3.1- 5.0	5.1- 7.0	7.1- 10.0	10.1- 13.0	13.1- 18.0	> 18.0	
N	0	1	0	1	5	9	42	8	0	0	0	0	66
NNE	0	0	0	3	20	47	34	3	0	0	0	0	107
NE	0	0	0	12	16	46	24	0	0	0	0	0	98
ENE	0	0	1	24	13	10	2	0	0	0	0	0	50
E	0	0	9	15	7	10	3	0	0	0	0	0	44
ESE	0	0	4	11	14	5	5	0	0	0	0	0	39
SE	0	0	2	10	11	16	11	0	0	0	0	0	50
SSE	0	0	0	4	11	11	6	0	0	0	0	0	32
S	0	0	2	11	14	38	21	0	0	0	0	0	86
SSW	0	0	1	11	39	55	28	3	0	0	0	0	137
SW	0	0	0	4	36	105	175	31	4	0	0	0	355
WSW	0	0	1	1	7	23	100	43	2	0	0	0	177
W	0	0	0	0	1	8	34	4	0	0	0	0	47
WNW	0	0	0	0	1	1	18	1	0	0	0	0	21
NW	0	0	0	0	1	5	10	2	0	0	0	0	18
NNW	0	0	0	0	4	8	19	3	2	0	0	0	36
Totals	0	1	20	107	200	397	532	98	8	0	0	0	1363

Number of Calm Hours for this Table 18
 Number of Variable Direction Hours for this Table 0
 Number of Invalid Hours 297
 Number of Valid Hours for this Table 1363
 Total Hours for the Period 43823

SUSQUEHANNA STEAM ELECTRIC STATION
 UNITS 1 AND 2
 EMERGENCY PLAN

JOINT FREQUENCY DISTRIBUTION

FIGURE B-7

Joint Frequency Distribution

Hours at Each Wind Speed and Direction

Period of Record = 01/01/99 1:00- 12/31/03 23:00 Total Period

Elevation:

Speed: 10M SPD

Direction:

10M WD Lapse:

DT60-10

Stability Class: C

Delta Temperature: Slightly Unstable

	<u>Wind Speed (m/s)</u>												
<u>Wind</u> <u>Direction</u> <u>from</u>	<u>0.23-</u> <u>0.50</u>	<u>0.51-</u> <u>0.75</u>	<u>0.76-</u> <u>1.0</u>	<u>1.1-</u> <u>1.5</u>	<u>1.6-</u> <u>2.0</u>	<u>2.1-</u> <u>3.0</u>	<u>3.1-</u> <u>5.0</u>	<u>5.1-</u> <u>7.0</u>	<u>7.1-</u> <u>10.0</u>	<u>10.1-</u> <u>13.0</u>	<u>13.1-</u> <u>18.0</u>	<u>> 18.0</u>	<u>Total</u>
N	0	0	0	3	7	23	73	6	0	0	0	0	112
NNE	0	0	1	8	21	52	59	6	0	0	0	0	147
NE	0	0	0	12	24	45	20	0	0	0	0	0	101
ENE	0	0	2	25	20	14	4	0	0	0	0	0	65
E	0	1	7	19	8	8	3	0	0	0	0	0	46
ESE	0	1	6	15	16	10	3	0	0	0	0	0	51
SE	1	0	7	9	17	13	11	0	0	0	0	0	58
SSE	0	1	4	12	18	21	12	0	0	0	0	0	68
S	0	0	4	26	28	50	28	0	0	0	0	0	136
SSW	0	0	1	24	35	76	17	2	0	0	0	0	155
SW	0	0	1	18	43	146	186	37	1	0	0	0	432
WSW	0	0	1	3	11	38	139	61	7	0	0	0	260
W	0	0	0	8	7	7	51	21	1	0	0	0	95
WNW	0	0	0	0	2	14	31	1	0	0	0	0	48
NW	0	0	1	0	3	9	30	4	0	0	0	0	47
NNW	0	0	0	1	1	19	31	16	2	0	0	0	70
Totals	1	3	35	183	261	545	698	154	11	0	0	0	1891

Number of Calm Hours for this Table 18
 Number of Variable Direction Hours for this Table 0
 Number of Invalid Hours 297
 Number of Valid Hours for this Table 1891
 Total Hours for the Period 43823

SUSQUEHANNA STEAM ELECTRIC STATION
 UNITS 1 AND 2
 EMERGENCY PLAN

JOINT FREQUENCY DISTRIBUTION

FIGURE B-8

Joint Frequency Distribution

Hours at Each Wind Speed and Direction

Period of Record = 01/01/99 1:00- 12/31/03 23:00 Total Period

Elevation:

Speed: 10M SPD

Direction:

10M WDLapse:

DT60-10

Stability Class: D

Delta Temperature: Neutral

		<u>Wind Speed (m/s)</u>											<u>Total</u>
<u>Wind Direction from</u>	<u>0.23-0.50</u>	<u>0.51-0.75</u>	<u>0.76-1.0</u>	<u>1.1-1.5</u>	<u>1.6-2.0</u>	<u>2.1-3.0</u>	<u>3.1-5.0</u>	<u>5.1-7.0</u>	<u>7.1-10.0</u>	<u>10.1-13.0</u>	<u>13.1-18.0</u>	<u>> 18.0</u>	
N	2	7	23	74	119	433	716	98	0	0	0	0	1472
NNE	1	16	64	214	267	519	324	15	0	0	0	0	1420
NE	9	33	119	276	281	418	164	6	0	0	0	0	1306
ENE	8	51	130	219	153	158	54	3	0	0	0	0	776
E	10	85	158	202	124	119	32	5	0	0	0	0	735
ESE	15	67	144	144	117	146	58	7	3	1	0	0	702
SE	7	53	110	219	169	200	121	14	1	0	0	0	894
SSE	10	38	74	163	158	179	89	9	1	0	0	0	721
S	3	26	84	210	204	257	106	7	0	0	0	0	897
SSW	0	15	54	220	242	368	139	2	0	0	0	0	1040
SW	1	8	29	193	242	594	864	170	7	0	0	0	2108
WSW	0	3	15	87	132	254	627	425	90	1	0	0	1634
W	0	1	6	38	80	196	396	172	35	0	0	0	924
WNW	0	2	4	23	49	157	314	108	19	0	0	0	676
NW	1	2	11	31	45	225	632	178	6	0	0	0	1131
NNW	0	4	8	33	52	268	752	280	8	0	0	0	1405
Totals	67	411	1033	2346	2434	4491	5388	1499	170	2	0	0	17841

Number of Calm Hours for this Table	18
Number of Variable Direction Hours for this Table	0
Number of Invalid Hours	297
Number of Valid Hours for this Table	17841
Total Hours for the Period	43823

SUSQUEHANNA STEAM ELECTRIC STATION
UNITS 1 AND 2
EMERGENCY PLAN

JOINT FREQUENCY DISTRIBUTION

FIGURE B-9

Joint Frequency Distribution

Hours at Each Wind Speed and Direction

Period of Record = 01/01/99 1:00- 12/31/03 23:00 Total Period

Elevation: Speed: 10M SPD

Direction:

10M WDLapse:

DT60-10

Stability Class: E

Delta Temperature: Slightly Stable

<u>Wind</u> <u>Direction</u> <u>from</u>	<u>Wind Speed (m/s)</u>												<u>Total</u>
	<u>0.23-</u> <u>0.50</u>	<u>0.51-</u> <u>0.75</u>	<u>0.76-</u> <u>1.0</u>	<u>1.1-</u> <u>1.5</u>	<u>1.6-</u> <u>2.0</u>	<u>2.1-</u> <u>3.0</u>	<u>3.1-</u> <u>5.0</u>	<u>5.1-</u> <u>7.0</u>	<u>7.1-</u> <u>10.0</u>	<u>10.1-</u> <u>13.0</u>	<u>13.1-</u> <u>18.0</u>	<u>> 18.0</u>	
N	1	14	28	90	138	144	53	2	0	0	0	0	470
NNE	3	33	112	324	269	254	79	1	0	0	0	0	1075
NE	13	124	289	551	197	159	54	0	0	0	0	0	1387
ENE	20	279	467	493	87	29	7	3	0	0	0	0	1385
E	41	378	361	154	33	29	5	0	0	0	0	0	1001
ESE	45	265	207	99	30	24	8	5	0	0	0	0	683
SE	37	201	229	152	48	50	23	10	4	0	0	0	754
SSE	19	109	183	213	95	63	40	6	0	0	0	0	728
S	10	75	216	413	193	151	49	18	0	0	0	0	1125
SSW	3	42	126	397	334	309	84	4	0	0	0	0	1299
SW	2	14	39	188	209	343	210	10	1	0	0	0	1016
WSW	0	4	12	64	80	83	61	14	3	0	0	0	321
W	2	1	9	36	33	37	19	4	0	0	0	0	141
WNW	0	2	7	16	23	34	13	0	0	0	0	0	95
NW	1	2	4	19	42	87	24	2	0	0	0	0	181
NNW	0	5	6	21	41	116	35	2	0	0	0	0	226
Totals	197	1548	2295	3230	1852	1912	764	81	8	0	0	0	11887

Number of Calm Hours for this Table 18
 Number of Variable Direction Hours for this Table 0
 Number of Invalid Hours 297
 Number of Valid Hours for this Table 11887
 Total Hours for the Period 43823

SUSQUEHANNA STEAM ELECTRIC STATION
 UNITS 1 AND 2
 EMERGENCY PLAN

JOINT FREQUENCY DISTRIBUTION

FIGURE B-10

Joint Frequency Distribution

Hours at Each Wind Speed and Direction

Period of Record = 01/01/99 1:00- 12/31/03 23:00 Total Period

Elevation:

Speed: 10M SPD

Direction:

10M WD Lapse:

DT60-10

Stability Class: F

Delta Temperature: Moderately Stable

Wind Speed (m/s)

<u>Wind Direction from</u>	<u>0.23- 0.50</u>	<u>0.51- 0.75</u>	<u>0.76- 1.0</u>	<u>1.1- 1.5</u>	<u>1.6- 2.0</u>	<u>2.1- 3.0</u>	<u>3.1- 5.0</u>	<u>5.1- 7.0</u>	<u>7.1- 10.0</u>	<u>10.1- 13.0</u>	<u>13.1- 18.0</u>	<u>> 18.0</u>	<u>Total</u>
N	1	5	6	25	11	5	2	0	0	0	0	0	55
NNE	5	21	34	66	32	9	1	0	0	0	0	0	168
NE	13	92	198	257	50	1	1	0	0	0	0	0	612
ENE	21	361	806	994	149	6	0	0	0	0	0	0	2337
E	44	371	356	149	9	0	0	0	0	0	0	0	929
ESE	23	160	122	15	0	0	0	0	0	0	0	0	320
SE	14	82	82	25	2	0	0	0	0	0	0	0	205
SSE	8	32	78	49	6	1	0	0	0	0	0	0	174
S	2	29	78	121	14	1	1	0	0	0	0	0	246
SSW	1	16	24	81	37	4	1	0	0	0	0	0	164
SW	1	4	15	38	21	19	2	0	0	0	0	0	100
WSW	0	0	5	6	4	3	1	0	0	0	0	0	19
W	2	2	3	5	0	1	0	0	0	0	0	0	13
WNW	1	0	0	2	2	1	0	0	0	0	0	0	6
NW	0	0	2	1	1	2	1	0	0	0	0	0	7
NNW	1	0	3	2	5	2	2	0	0	0	0	0	15
Totals	137	1175	1812	1836	343	55	12	0	0	0	0	0	5370

Number of Calm Hours for this Table	18
Number of Variable Direction Hours for this Table	0
Number of Invalid Hours	297
Number of Valid Hours for this Table	5370
Total Hours for the Period	43823

SUSQUEHANNA STEAM ELECTRIC STATION
UNITS 1 AND 2
EMERGENCY PLAN

JOINT FREQUENCY DISTRIBUTION

FIGURE B-11

Joint Frequency Distribution

Hours at Each Wind Speed and Direction

Period of Record = 01/01/99 1:00- 12/31/03 23:00 Total Period
 Elevation: Speed: 10M SPD Direction: 10M WDLapse: DT60-10

Stability Class: G Delta Temperature: Extremely Stable

<u>Wind</u> <u>Direction</u> <u>from</u>	<u>Wind Speed (m/s)</u>												<u>Total</u>
	<u>0.23-</u> <u>0.50</u>	<u>0.51-</u> <u>0.75</u>	<u>0.76-</u> <u>1.0</u>	<u>1.1-</u> <u>1.5</u>	<u>1.6-</u> <u>2.0</u>	<u>2.1-</u> <u>3.0</u>	<u>3.1-</u> <u>5.0</u>	<u>5.1-</u> <u>7.0</u>	<u>7.1-</u> <u>10.0</u>	<u>10.1-</u> <u>13.0</u>	<u>13.1-</u> <u>18.0</u>	<u>> 18.0</u>	
N	1	2	2	3	1	0	0	0	0	0	0	0	9
NNE	1	16	17	17	3	1	0	0	0	0	0	0	55
NE	2	71	168	162	19	1	0	0	0	0	0	0	423
ENE	8	167	690	1065	186	4	0	0	0	0	0	0	2120
E	13	120	219	102	3	0	0	0	0	0	0	0	457
ESE	4	63	55	9	0	0	0	0	0	0	0	0	131
SE	3	31	35	12	2	1	0	0	0	0	0	0	84
SSE	0	14	23	15	3	0	0	0	0	0	0	0	55
S	0	5	12	17	0	0	0	0	0	0	0	0	34
SSW	1	2	8	7	5	1	0	0	0	0	0	0	24
SW	0	2	3	1	0	1	0	0	0	0	0	0	7
WSW	0	1	0	0	0	0	0	0	0	0	0	0	1
W	0	0	0	0	0	1	0	0	0	0	0	0	1
WNW	0	0	0	0	0	0	0	0	0	0	0	0	0
NW	0	1	0	0	0	0	0	0	0	0	0	0	1
NNW	0	2	0	1	0	0	0	0	0	0	0	0	3
Totals	33	497	1232	1411	222	10	0	0	0	0	0	0	3405

Number of Calm Hours for this Table 18
 Number of Variable Direction Hours for this Table 0
 Number of Invalid Hours 297
 Number of Valid Hours for this Table 3405
 Total Hours for the Period 43823

SUSQUEHANNA STEAM ELECTRIC STATION
 UNITS 1 AND 2
 EMERGENCY PLAN

JOINT FREQUENCY DISTRIBUTION

FIGURE B-12

Joint Frequency Distribution

Hours at Each Wind Speed and Direction

Period of Record = 01/01/99 1:00- 12/31/03 23:00 Total Period
 Elevation: Speed: 10M SPD Direction: 10M WDLapse: DT60-10

Summary of All Stability Classes Delta Temperature

	Wind Speed (m/s)												
Wind Direction from	0.23- 0.50	0.51- 0.75	0.76- 1.0	1.1- 1.5	1.6- 2.0	2.1- 3.0	3.1- 5.0	5.1- 7.0	7.1- 10.0	10.1- 13.0	13.1- 18.0	> 18.0	Total
N	6	29	59	198	284	625	914	118	0	0	0	0	2233
NNE	10	86	228	635	613	910	555	29	0	0	0	0	3066
NE	37	320	774	1277	602	715	286	60	0	0	0	0	4017
ENE	57	858	2097	2828	625	232	71	6	0	0	0	0	6774
E	108	955	1114	667	192	170	44	5	0	0	0	0	3255
ESE	87	557	545	305	184	193	80	12	3	1	0	0	1967
SE	62	367	467	433	263	313	186	24	5	0	0	0	2120
SSE	37	194	364	462	310	311	161	16	1	0	0	0	1856
S	15	135	398	808	481	559	268	26	0	0	0	0	2690
SSW	5	75	214	752	730	918	357	1	0	0	0	0	3066
SW	4	28	88	452	589	1385	1698	276	14	0	0	0	4534
WSW	0	8	34	165	241	430	1053	578	104	1	0	0	2614
W	4	4	18	88	123	254	548	206	36	0	0	0	1281
WNW	1	4	11	42	79	213	388	110	19	0	0	0	867
NW	2	5	18	51	93	328	703	189	6	0	0	0	1395
NNW	1	11	17	59	103	414	851	305	12	0	0	0	1773
Totals	436	3636	6446	9222	5512	7970	8163	1921	200	2	0	0	43508

Number of Calm Hours for this Table 18
 Number of Variable Direction Hours for this Table 0
 Number of Invalid Hours 297
 Number of Valid Hours for this Table 43508
 Total Hours for the Period 43823

SUSQUEHANNA STEAM ELECTRIC STATION
 UNITS 1 AND 2
 EMERGENCY PLAN

JOINT FREQUENCY DISTRIBUTION

FIGURE B-13

APPENDIX C

SSES EMERGENCY PLAN POSITION SPECIFIC PROCEDURES (TYPICAL)

APPENDIX C**SSES EMERGENCY PLAN POSITION SPECIFIC PROCEDURES
(TYPICAL)**

EMERGENCY PLAN POSITION SPECIFIC PROCEDURES (Response Procedures)	
CR Procedures	EOF Procedures
Emergency Director	Recovery Manager
Emergency Plan Communicator	EOF Support Supervisor
NRC Communicator	NEP Duty Planner
	EOF Emergency Plan Communicator
TSC Procedures	Environmental Sampling Team
Emergency Director	Radiological Monitoring Team
TSC Technical Support Coordinator	EOF Administrative Assistant
TSC Operations Coordinator	EOF Liaison Support Supervisor
Radiation Protection Coordinator	EOF Dose Assessment Staffer
TSC Dose Calculator	EOF Dose Assessment Supervisor
HP Tech I (Oscar)	Field Team Director
TSC Lead Engineer	EOF Environmental Sampling Director
Security Coordinator	EOF Technical Advisor
TSC Administrative Coordinator	EOF Information Coordinator
TSC E Plan Communicator	Engineering Support Supervisor
HPN Communicator	Fuels Lead Engineer / Core Thermal Hydraulics Engineer
HP II Dose Calculator	EOF Systems Lead Engineer
Damage Control Team Coordinator	EOF / GO Support Engineer
Severe Accident Management Coordinator	
TSC NRC Communicator	JIC Procedures
TSC Information Coordinator	Public Information Manager
Fuels Lead Engineer / Core Thermal Hydraulics Engineer	News Manager
TSC HP Radio Communicator	JIC Technical Briefer
	Support Services Manager
OSC Procedures	Media & Public Officials Contact
OSC Coordinator	JIC Logkeeper
HP Specialist	JIC Writer
Radio Communicator	JIC Administrative Coordinator
Maintenance Foreman/Field Unit Supervisor	
Chemistry Coordinator	
OSC Clerk	
OTHER EMERGENCY PLAN RESPONSE PROCEDURES	
Emergency Telephone Instructions and Directory	Susquehanna Offsite Organization Response to Plant Events
Remote Assembly Area Contamination Control	Termination and Restoration
Brief Non-Technical Description of EALs	EAL Classification Bases
SSES MIDAS-NU User Manual	Personnel Accountability

APPENDIX D

EQUIPMENT INFORMATION LISTINGS

CONTENTS OF APPENDIX D

Equipment Information Listings

- Enclosure 1 Typical Station Decontamination Area Equipment
 Typical Damage Control Equipment Storage Box Contents

- Enclosure 2 Onsite Search and Rescue/First Aid, Typical Ambulance and Hospital Radiation
 Emergency Equipment and Supplies

- Enclosure 3 Natural Phenomena Monitors

- Enclosure 4 Radiological Monitors

- Enclosure 5 Environmental Monitoring Systems

- Enclosure 6 Typical Health Physics Van Radiation Emergency Monitoring Equipment

- Enclosure 7 Emergency Classification Dependent Instrumentation

- Enclosure 8 Typical Initial Emergency Equipment for Initial Incident Response
 Typical TSC Equipment

- Enclosure 9 Typical EOF Equipment

ENCLOSURE 1 TO APPENDIX D

Typical Station Decontamination Area Equipment

Decontamination Procedures	Lotion Skin Cleaner
Cotton Gloves	Masking Tape
Coveralls (Disposable)	Paper Towels
Decontamination Soap	Shoe Covers, paper
Disposable Bath Towels	Spare Frisker Cable
Disposable Gloves	Spare Frisker Probe
Frisker	Sponges
Hand Brushes	
Hand Cream	

Typical Damage Control Equipment Storage Box Contents

Amprobe	Plugs, Wood, 1" & 6"
Bars, Pry, Large	Plugs, Wooden Box, 1", 1¼", 1½", 2", 2½", 3"
Bars, Pry, Rolling Lead	Rubber, Roll 1/16" thick, 10' X 3'
Black Wire, 1/4 lb. Rolls, 16 Gauge	Screwdrivers, Large Standard
Box, Tool, 23"	Screwdrivers, Medium Standard
Bucket, 14 quart, Plastic	Screwdrivers, Phillips, Large
Cable Cutters	Screwdrivers, Phillips, Medium
Clamps, C, Medium	String, Ball
Clamps, C, Large	Twine, Bale
Clamps, C, Small	Wedges, Wooden
Electricians Pouch with Miscellaneous Hand Tools	Wrench, Adjustable, 12"
Enerpac, Rescue Unit	Wrench, Adjustable, 8"
Flashlight, 5 cell	Wrench, Allen Pac 3/16", 7/32", 1/4", 5/16", 3/8"
Hammer, Ball Peen, 16 oz.	Wrench, Allen Pac .050", 1/16", 5/64", 3/32", 7/64", 1/8", 9/64", 5/32", 3/16", 7/32"
Hammer, Sledge, 10 lb.	Wrench, Chain
Hammer, Sledge, 8 lb.	Wrench, Hex, #110
Multimeter	Wrench, Hex, #17
Nylon Rope, 100' coils, 3/4"	Wrench, Hex, 24"
Nylon Rope, 25' coils, 3/8"	Wrench, Pipe, 18"
Nylon Rope, 50' coils, 3/8"	Wrench, Pipe, 14"
Nylon Rope, 50' coils, 3/4"	
Plastic Sheet, 20' X 20', Fire Retardant	
Pliers, Lineman	
Pliers, Water Pump	

ENCLOSURE 2 TO APPENDIX D

Typical Onsite Search and Rescue/First Aid, Ambulance, and

Hospital Radiation Emergency Equipment and Supplies

Onsite Search Rescue/First Aid:

Adjustable Litter
Basket Stretcher (Stokes)
First Aid Team Initial Response Kit with
Inventory Sheet

Folding Litter
Portable Oxygen-Demand Valve (size D tank
With assorted airways, cannulas, and masks)
Scoop Stretcher
Trauma Kit
Assorted Splinting Devices

Ambulance Kit:

Tape roll
Misc. Plastic Bags
Plastic Gloves

Plastic Sheeting, 8' X 20'
Plastic Shoe Covers
Portable Frisker and Probe
Set of Anti-contamination Clothing

Hospital:

Dosimeter Charger
Survey Meter
Frisker with Probe
Herculite - white, green and yellow
Lead Container, high activity samples

Self Reading Dosimeters
Set of Radiation Signs and Ribbon
Stanchions
Step-off Pad
Thermoluminescent Dosimeters, badge type
Thermoluminescent Dosimeters, ring type

ENCLOSURE 3 TO APPENDIX D

Natural Phenomena Monitors

METEOROLOGICAL MONITORING INSTRUMENTATION

1. Wind Speed Instrument
 - a. Elevation 10 meters and 60 meters.
2. Wind Direction Instrument
 - a. Elevation 10 meters and 60 meters.
3. Air Temperature Difference Instrument
 - a. Elevation 10/60 meters.
4. Ambient Temperature Gauge Instrument
 - a. Elevation 10 meters.
5. Dew Point Gauge Instrument
 - a. Elevation 10 meters.
6. Rainfall Gauge Instrument
 - a. Ground level.

SEISMIC MONITORING INSTRUMENTATION

INSTRUMENTS AND SENSOR LOCATIONS

1. Triaxial Accelerometers and Triggers
 - a. Reactor Equipment, Unit 1
 - b. Reactor Bldg. Floor (RHR), Unit 1
 - c. ESSW Pumphouse Floor (a)
 - d. Containment Foundation, Unit 1 (a)
 - e. Containment Structure, Unit 1
 - f. Containment Foundation, Unit 2 (a)
2. Response-Spectrum Analyzer/Recorders
 - (a) The Unit 1 Containment Foundation, Unit 2 Containment Foundation and ESSW Pumphouse Floor Accelerometer Channels have associated triggers. These triggers provide control room indication and annunciation.

Enclosure 4 to Appendix D		
RADIOLOGICAL MONITORS		
Instrument Type	Individual Detectors	Function & Sensitivity
Air Sampling Equipment	Continuous Air Monitors	Particulate, Iodine Equipment & Gas Monitor
	High volume samplers	Particulate, Iodine
	Low volume samplers	Particulate, Iodine
	Breathing zone samplers	Particulate, Iodine
Personnel Dosimetry	Electronic Dosimetry TLD's	0 - 100,000 mrem
Portable Survey Instruments	GM survey instruments	0 - 2 R/hr
	Ion chamber survey instruments	0 - 5 Rem/hr
	Ion chamber survey instruments	0 - 50 Rem/hr
	Telescoping GM survey instruments	0 - 1,000 R/hr
	GM count rate meters	0 - 50,000 cpm
	Meter with alpha scintillation probe	10 CPM to 100,000 CPM
	Neutron detector Portal monitors	0 - 5 Rem/hr
Counting Room	Low background gas	N/A
	proportional counters	
	Liquid scintillation counter	
	scintillation - alpha	
	scintillation - beta	
	High Purity Ge Spectrometer	
	GM End Window Scaler	

Enclosure 4 to Appendix D (Cont'd.) AREA RADIATION MONITORS (ARMS)				
Channel #	Location Building and Area	Elev.	Range (mR/hr)	Local Alarm
1	1R/2R Resid Heat Removal Area	645'	0.1-1000	Yes
2	1R/2R RCIC Pump Turbine Room	645'	0.01-100	Yes
3	1R/2R HPCI Pump Turbine Room	645'	0.01-100	Yes
4	1R/2R Radwaste Sump Area	645'	0.1-1000	Yes
5	1R/2R Control Rod Drive (North)	719'	0.1-1000	Yes
6	1R/2R Control Rod Drive (South)	719'	0.1-1000	Yes
7	1R/2R Offgas By Pass Line	656'	0.1-1000	Yes
8	1R/2R Cleanup Recirc. Pump Access Area	749'	0.01-100	Yes
9	1R/2R CRD Repair Area	719'	0.1-1000	Yes
10	1R/2R Fuel Pool Room	749'	0.1-1000	Yes
11	1R/2R Sample Station Room	749'	0.01-100	Yes
12	1R/2R Recirc. Fan Room	799'	0.01-100	Yes
13	1R/2R New Fuel Storage Vault	817'	0.1-1000	Yes
14	1R/2R Spent Fuel Pool	818'	0.1-1000	Yes
15	1R/2R Refueling Floor Area	818'	0.01-100	Yes
16	1R/2R Access to Remote Shutdown	670'	0.01-100	Yes
17	1T/2T Cond. Pumps Area	656'	0.01-100	Yes
18	1T/2T RFPT Area at Reactor Bldg Access	676'	0.01-100	Yes
19	1T/2T Air Ejector Room	682'	0.1-1000	Yes
20	1T/2T Feedwater Heater Area	699'	0.1-1000	Yes
21	1T/2T Rx Recirc. MG Set Area	729'	0.01-100	Yes
22	1T/2T Generator Bay Area	729'	0.01-100	Yes
23	1T/2T H&V Equip. Room	762'	0.01-100	Yes
24	1T/2T Turbine Front End	729'	0.01-100	Yes
25	1R/2R Resid. Heat Removal Area	645'	0.1-1000	Yes
26	1R/2R TIP Drive Area	719'	0.1-1000	Yes
27	S&A Bldg. Entrance to Turbine Floor	729'	0.01-100	Yes
28	S&A Bldg. 2nd Floor Corridor	691'	0.01-100	Yes
29	RW Corr. Pers. Access Area	646'	0.1-1000	Yes
30	RW Opt. Surveil. Contr. Area	646'	0.1-1000	Yes
31	RW Corr. to Collection Tank	646'	0.1-1000	Yes
32	RW Controlled Zone Shop	676'	0.1-1000	Yes
33	RW Control Room	676'	0.1-1000	Yes
34	RW Storage and Equip. Area	676'	0.1-1000	Yes
35	RB Sampling Cask Storage Area	818'	0.01-100	Yes
36	RB Railroad Access Area	670'	0.01-100	Yes

Enclosure 4 to Appendix D (Cont'd) AREA RADIATION MONITORS (ARMs)				
Channel #	Location Building and Area	Elev.	Range (mR/hr)	Local Alarm
37	Standby Gas Treatment Room	806'	0.01-100	Yes
38	Control Structure Rad Chem Lab.	676'	0.01-100	Yes
39	Control Structure Control Room	729'	0.01-100	Yes
40	S&A Access to Unit 1 Turbine Bldg.	676'	0.01-100	Yes
41	RB Tip Chamber Shield Area	719'	100-1,000,000	Yes
42	RB Refueling Floor Area	818'	.01-100	Yes
46 (43 U-2)	RB New Fuel Storage Vault	817'	0.1-1000	Yes
47 (44 U-2)	RB Spent Fuel Pool Area	818'	0.1-1000	Yes
48	1R/2R HPCI Pump & Turbine Room	645'	100-1,000,000	No
49	1R/2R Refueling Floor Area	818'	100-1,000,000	No
50	1R/2R Control Rod Drive North	719'	100-1,000,000	No
51	1R/2R Control Rod Drive South	719'	100-1,000,000	No
52	1R/2R RWCU Recirc. Pump Access Area	749'	100-1,000,000	No
53	1R/2R Access to Remote Shutdown Panel	670'	100-1,000,000	No
54	1R/2R Fuel Pool Pump Room	749'	100-1,000,000	No
55	1R/2R RHR Room - Loop A	645'	100-1,000,000	No
56	1R/2R RHR Room - Loop B	645'	100-1,000,000	No
57	1R/2R RCIC Pump Turbine Room	645'	100-1,000,000	No

Enclosure 4 to Appendix D (Cont'd.) PROCESS MONITORS			
System	Det. Types	Range	Location
Main Steam Line	ION Chambers (IC)	1-10 ⁶ mR/hr	Near main steamlines between primary and secondary containment walls, just downstream of MSIVs
Refueling Floor Wall Exhaust Duct	GMs	0.01-100 mR/hr	Exhaust ducting upstream of inboard isolation damper, prior to discharge through reactor building vent
Refueling Floor High Exhaust Duct.	GMs	0.01-100 mR/hr	Exterior to fuel pool ventilation exhaust duct
Railroad Access Exhaust Duct	GMs	0.01-100 mR/hr	Exhaust duct prior to Rx building vent
Emergency Outside Air Intake	GMs	0.01-100 mR/hr	In the outside intake air plenum
Offgas Pretreatment (SJAE)	ICs	1-10 ⁶ mR/hr	Discharge of the delay pipe after SJAE
Liquid Radwaste Effluent	Scintillation (SCIN)	10 - 10 ⁷ cpm	Off-line on liquid waste effluent discharge
Service Water (FPC)	SCIN	10 ⁻¹ - 10 ⁶ cps	Downstream of fuel pool HX prior to discharge to cooling towers
RHR Service Water	SCIN	10 ⁻¹ - 10 ⁶ cps	On the downstream piping of each RHR HX
RX Building Closed	SCIN	10 ⁻¹ - 10 ⁶ cpm	Suction piping of the Water RBCCW pumps
Standby Gas Treatment	GM	0.01-100 mR/hr	Inside exhaust ductwork
SGTS Vent Exhaust	IC	1-10 ⁸ R/hr	Drywell
Containment Monitor			

Enclosure 4 to Appendix D (Cont'd.) VENT MONITORS		
Type	Minimum	Location
GM & SCIN	10^{-6} micro Ci/cc gas.	Five locations in turbine building, reactor building, and SGTS vents
Iodine Sampling Cartridge	NA*	
Particulate Filter	NA*	

* Sensitivity dependent on sample size and count time. Sensitivities equal to or better than $10E-11$ micro Ci/cc are achievable.

Enclosure 5 to Appendix D		
ENVIRONMENTAL MONITORING SYSTEMS		
1. Environmental Monitoring Systems		
Instrument System	Individual Detectors	Purpose
A. Radiological Environmental Monitoring System	off-site fixed air sampling stations	sample particulates sample iodine
	direct radiation monitor stations	measure gamma dose
B. Analytical Facilities	near-site radiation chemistry laboratory*	radiochemical analysis of environmental and bioassay samples
	off-site environmental contractor**	analysis as above, and also very low-level activity analysis

* Near-Site Radiation Chemistry Laboratory; used for effluent, reactor coolant and primary containment sample analysis

Capabilities:

- (1) Gamma Spectrum Analysis: 25-50 samples per 24 hour day; samples may be in the form of water, air (filters/charcoal cartridges and gas marinelli beakers) and other free-flowing liquids.
- (2) Liquid Scintillation Analysis: 25 samples per 24 hour day; samples in liquid form.

Equipment:

- (1) Intrinsic germanium detector with associated electronics and computer system.
- (2) Liquid scintillation detectors.

** Off-site Environmental Contractor (Teledyne Brown Engineering, Inc.); used for post-accident environmental samples

Location: Knoxville, TN.

Capabilities:

- (1) Gamma Spectrum Analysis: 50 samples per 24 hour day; samples may be in the form of food, milk, water, air filters and charcoal cartridges.
- (2) Gross Alpha/Beta Analysis: 50 samples per 24 hour day; samples may be in the form of air filters and water.

Equipment:

- (1) Intrinsic germanium detector with associated electronics and computer system.
- (2) Liquid scintillation detectors.
- (3) Gas proportional detector.

Response Time:

- (1) During normal hours staff existing at facility.
- (2) During off normal hours two hours following notification.

<p>Enclosure 5 to Appendix D (Cont'd.)</p> <p>ENVIRONMENTAL MONITORING SYSTEMS</p>
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2. Typical Radiological Monitoring Team Equipment

Emergency Planning and Grid Coordinate Maps
Stopwatch, tweezers, masking tape
Survey Meter with current calibration
Low Volume Air Sampler and Head
Potassium Iodide Tablets
Radioactive Material Stickers
Particulate Filters, box
Silver Zeolite Cartridges
Disposable Plastic Gloves
Plastic sample bags and labels
Flashlight
Spare Battery and Fuse kit
Self Reading Dosimetry

3. Typical Emergency Environmental Sample Kit Contents

Assortment of Sampling Bags	Rubber/Plastic Gloves
Flashlight	Sample Containers
Grid Coordinate Map	Sample Labels
Low and High Range Dosimeters	Scale
Pliers	Scissors
Self Reading Dosimetry	Spare Batteries

ENCLOSURE 6 TO APPENDIX D

**Typical Health Physics Van Radiation Emergency
Monitoring Equipment**

Survey Meter with current calibration	Stopwatch
Portable Frisker with probe	Tape
Low Volume Air Sampler with head (AC powered)	Survey Data Labels
Low Volume Air Sampler with DC power plug	Microfiber Wipes
Spare Frisker Cable	Smear Papers
DC to AC Inverter	Plastic bags for samples
VHF mobile radio	Extension cord
Respirators	Work light
Iodine Canister	Flashlight
Potassium Iodide Tablets	First Aid Kit
Sets of Anti-contamination Clothing	Spare batteries
Protective gloves	Spare fuses for Air Sampler
Calculator	Safety Vests
Emergency Planning Map	Self reading Dosimetry
Check source	
Silver Zeolite cartridges	
Particulate Filters	
Tweezers	

ENCLOSURE 7 TO APPENDIX D

Emergency Classification Dependent Instrumentation

Vent Stack Monitors
Meteorological Tower Indication
Remote Monitoring System
Airborne Sampling System
Liquid Radwaste Sampling
Liquid Discharge Radiation Monitors
Spent Fuel Pool Level Indication
Area Radiation Monitors
Primary Containment Isolation Valve Position Indication
Reactor Coolant System Sampling
Reactor Pressure Vessel Level Indication (Fuel Zone, Shutdown Range, Extended Wide Range)
Main Steam Isolation Valve Position Indication
Main Steam Line Flow Indication
Main Steam Line Tunnel Temperature Indication
Drywell Sump Level Indication
Reactor Building Temperature Indication
Containment Pressure Indication
Containment Hydrogen / Oxygen Analyzers
Containment High Range Radiation Monitor
AC Power – 13.8KV (Downstream Loads / Breaker Position)
AC Power – 4KV (Downstream Loads / Breaker Position)
125 VDC Power (Downstream Loads / Breaker Position)
Nuclear Instrumentation (APRM, SRM)
Suppression Pool Temperature Indication
Suppression Pool Level Indication
Reactor Pressure Vessel Pressure Indication
Drywell Equipment Drain Tank Level Indication
Offgas Pretreatment Radiation Monitor
Seismic Monitor Instrumentation
Station Flooding Instrumentation
Simplex Fire Detection
Reactor Coolant System Temperature Indication
Reactor Building Sump Level Indication
Reactor Protection System Trip Indication

ENCLOSURE 8 TO APPENDIX D

Typical Emergency Equipment for Initial Incident Response

Portable frisker with probe
Low volume Air Sample with Head
High Volume Air Sampler with Head
Survey Meter
Spare frisker cable and probe
Particulate filter paper
Silver Zeolite Cartridges
Spare Batteries and fuses
Portable Worklight
Extension Cord
Self Reading Dosimetry*
Potassium Iodine Tablets
Anti-contamination Clothing
Full face Respirator
Iodine Filter Canisters
SCBA Equipment
Emergency Plan
Emergency Plan Position Specific Instructions
Emergency Planning Map with offsite sampling locations
Onsite Monitoring Locations Map
First Aid Kit
Keys to Health Physics Van
Emergency Plan Keys
Food and potable water adequate to support 10 people for 5 days.
*Available at OSC and at HP control point to the RCA.

Typical Technical Support Center Equipment

Plant Technical Specifications
Operating Procedures Manual
Emergency Operating Procedure Manual
Final Safety Analysis Report
EP and EP-PSs
Safety Procedure Manual
Offsite Dose Calculation Manual
Plant as built drawings
Emergency Phone Directory
Copy Machine and Telecopier

ENCLOSURE 9 TO APPENDIX D

Typical Emergency Operations Facility Equipment

Plant Technical Specifications
Operating Procedures Manual
Emergency Operating Procedures Manual
Final Safety Analysis Report
Emergency Plan
Emergency Plan Position Specific Instructions
Current Emergency Plans for PEMA, LCEMA, CCEMA
Rad Health Handbook
Offsite Dose Calculation Manual
Emergency Phone Directory
Emergency Planning Map with Offsite Monitoring Locations
Calculators
Flashlight
First Aid Kit

APPENDIX E

Susquehanna Nuclear, LLC Policy Statement: SUSQUEHANNA SES EMERGENCY MANAGEMENT

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July 17, 2015

SUSQUEHANNA NUCLEAR LLC POLICY STATEMENT:

SUSQUEHANNA STEAM ELECTRIC STATION EMERGENCY MANAGEMENT

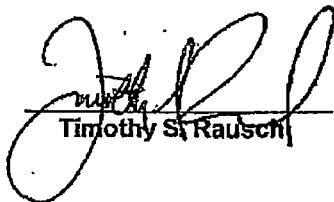
Immediate response, assessment, and the implementation of protective and corrective measures pertaining to an emergency condition at the Susquehanna Steam Electric Station shall be the responsibility of the SSES Emergency Director until relieved of this function by the Recovery Manager. The individuals who shall act in the capacity of SSES Emergency Managers are determined as follows:

Immediately upon the occurrence of an emergency, the Shift Manager on duty at the station shall assume the role of SSES Emergency Director, as described in the SSES Emergency Plan, until relieved of that responsibility by the Emergency Director or his designated alternate.

If the emergency requires activation of the Emergency Operations Facility (EOF), the SSES Recovery Manager shall assume responsibility for overall management of the emergency and off-site Protective Action Recommendations. The SSES Emergency Director retains responsibility for on-site operations.

The SSES Emergency Managers shall implement applicable portions of the SSES Emergency Plan to prevent or mitigate the consequences of emergencies at the Susquehanna Steam Electric Station. They shall have the authority to act on behalf of Susquehanna Nuclear, LLC, in all matters concerning an emergency, at least until such time as the scope, severity, and potential radiological consequences have been assessed, and the appropriate protective and corrective actions have been implemented. Following that critical period, but still with complete regard for health and safety, major decisions and Corporate commitments are the responsibility of Susquehanna Nuclear, LLC, Management.

Throughout the course of an emergency condition, all expertise and support available within the Susquehanna Nuclear, LLC organization shall be provided at the request of the SSES Emergency Managers.


Timothy S. Rausch

APPENDIX F

DEVIATIONS TO NEI 99-01 REV. 4

**Susquehanna Deviations to NEI 99-01 Rev 4
INITIATING CONDITIONS and Emergency Actions Levels**

This document contains a table listing all of the NEI INITIATING CONDITIONS along with a correlation to the corresponding Susquehanna SES ICs. A description to any deviations from the NEI EALs is given.

NEI Reference	INITIATING CONDITION	Susquehanna IC Designation	Deviations
Section 5.4	Definitions	Definitions	<ul style="list-style-type: none"> • The listing of SIGNIFICANT TRANSIENTS was changed due to SSES design. • The definitions of CIVIL DISTURBANCE WAS MODIFIED to be consistent with the latest definition contained in the SSES Security Plan. • A definition of STRIKE ACTION was added and is consistent with regulatory guidance as contained in NEI guidance. The definition was added because the definition of STRIKE ACTION is no longer part of the Security Plan definitions. • Added a definition of INSTRUMENT SPECIFIED • Added a definition of sustained winds. • Added definitions in addition to those specified in the NEI guidance. • Added a definition of Security Condition to be consistent with change to Security Plan.

NEI Reference	INITIATING CONDITION	Susquehanna IC Designation	Deviations
AU1	Any UNPLANNED Release of Gaseous or Liquid Radioactivity to the Environment that Exceeds Two Times the Radiological Effluent Technical Specifications for 60 Minutes or Longer. <i>Op. Modes: All</i>	RU1	<ul style="list-style-type: none"> • EAL 4 The perimeter monitoring system (RMS) is not used as a threshold for EAL RU1. • EAL 5 is not used at Susquehanna. • Added the term liquid" to the EAL threshold for effluent releases.
AA1	Any UNPLANNED Release of Gaseous or Liquid Radioactivity to the Environment that Exceeds 200 Times the Radiological Effluent Technical Specifications for 15 Minutes or Longer. <i>Op. Modes: All</i>	RA1	<ul style="list-style-type: none"> • EAL 4 The (RMS) perimeter monitoring system is not used as a threshold for EAL RA1. • EAL #5 is not used at Susquehanna.
AS1	Offsite Dose Resulting from an Actual or Imminent Release of Gaseous Radioactivity Exceeds 100 mR TEDE or 500 mR Thyroid CDE for the Actual or Projected Duration of the Release. <i>Op. Modes: All</i>	RS1	<ul style="list-style-type: none"> • NEI EAL #4 is divided into two EALs #4 and #5 for Susquehanna. • EAL #5 utilizes Child Thyroid CDE as directed by the State of Pennsylvania instead of Adult Thyroid. • This EAL utilizes the EMERGENCY PLAN BOUNDARY for dose projections. • Particulate and Halogen levels are included in Noble Gas threshold by calculation rather than with a specific value for those parameters.

NEI Reference	INITIATING CONDITION	Susquehanna IC Designation	Deviations
AG1	Offsite Dose Resulting from an Actual or Imminent Release of Gaseous Radioactivity Exceeds 1000 mR TEDE or 5000 mR Thyroid CDE for the Actual or Projected Duration of the Release Using Actual Meteorology. <i>Op. Modes: All</i>	RG1	<ul style="list-style-type: none"> NEI EAL #4 is divided into two EALs #4 and #5 for Susquehanna. EAL #5 utilizes Child Thyroid CDE as directed by the State of Pennsylvania instead of Adult Thyroid. This EAL utilizes the EMERGENCY PLAN BOUNDARY for dose projections. Particulate and Halogen levels are included in Noble Gas threshold by calculation rather than with a specific value for those parameters.
AU2	Unexpected Increase in Plant Radiation. <i>Op. Modes: All</i>	RU2	None
AA3	Release of Radioactive Material or Increases in Radiation Levels Within the Facility that Impedes Operation of Systems Required to Maintain Safe Operations or to Establish or Maintain Cold Shutdown. <i>Op. Modes: All</i>	RA2	None
AA2	Damage to Irradiated Fuel or Loss of Water Level that Has or Will Result in the Uncovering of Irradiated Fuel Outside the Reactor Vessel. <i>Op. Modes: All</i>	RA3	<ul style="list-style-type: none"> NEI EAL #2 is divided into two EALs, #2 and #3 for Susquehanna.
CU1	RCS Leakage. <i>Op. Mode: Cold Shutdown</i>	CU4	None
CA1	Loss of RCS Inventory. <i>Op. Modes: Cold Shutdown</i>	CA4	None
CS1	Loss of RPV Inventory Affecting Core Decay Heat Removal Capability. <i>Op. Modes: Cold Shutdown</i>	CS4	None

NEI Reference	INITIATING CONDITION	Susquehanna IC Designation	Deviations
CG1	Loss of RPV Inventory Affecting Fuel Clad Integrity with Containment Challenged with Irradiated Fuel in the RPV. <i>Op. Modes: Cold Shutdown, Refueling</i>	CG4	None
CU2	UNPLANNED Loss of RCS Inventory with Irradiated Fuel in the RPV. <i>Op. Mode: Refueling</i>	CU5	None
CA2	Loss of RPV Inventory with Irradiated Fuel in the RPV. <i>Op. Modes: Refueling</i>	CA5	None
CS2	Loss of RPV Inventory Affecting Core Decay Heat Removal Capability with Irradiated Fuel in the RPV. <i>Op. Modes: Refueling</i>	CS5	None
CU3	Loss of All Offsite Power to Essential Busses for Greater Than 15 Minutes. <i>Op. Modes: Cold Shutdown, Refueling</i>	CU1	<ul style="list-style-type: none"> NEI condition "b" is conservatively not included.
CA3	Loss of All Offsite Power and Loss of All onsite AC Power to Essential Busses. <i>Op. Modes: Cold Shutdown, Refueling, Defueled</i>	CA1	<ul style="list-style-type: none"> The SSES EAL states "Failure to restore power to at least two 4.16 kV ESS busses on each unit within fifteen minutes from the time of loss of both offsite and onsite AC power."
CU4	UNPLANNED Loss of Decay Heat Removal Capability with Irradiated Fuel in the RPV. <i>OP. Modes: Cold Shutdown, Refueling</i>	CU3	None
CA4	Inability to Maintain Plant in Cold Shutdown with Irradiated Fuel in the RPV. <i>Op. Modes: Cold Shutdown, Refueling</i>	CA3	None
CU5	Fuel Clad Degradation. <i>Op. Mode: Refueling</i>	CU6	None

NEI Reference	INITIATING CONDITION	Susquehanna IC Designation	Deviations
CU6	UNPLANNED Loss of All onsite or Offsite Communications Capabilities. <i>Op. Modes: Cold Shutdown, Refueling</i>	CU7	None
CU7	UNPLANNED Loss of Required DC Power for Greater than 15 Minutes. <i>Op. Modes: Cold Shutdown, Refueling</i>	CU2	None
CU8	Inadvertent Criticality. <i>Op Modes:, Cold Shutdown, Refueling</i>	CU8	<ul style="list-style-type: none"> Only EAL #1 applies to Susquehanna.
E-HU1	Damage to a loaded cask CONFINEMENT BOUNDARY. <i>Op. Mode: Not Applicable</i>	EU1	<ul style="list-style-type: none"> Natural Phenomena EAL #1 not included as the Susquehanna ISFSI is within the PROTECTED AREA boundary. This IC would therefore be covered by OU5. NEI EAL #2 is divided into two EALs, #1 and #2 for Susquehanna. FIRE Damage to the ISFSI is covered by EAL OU6. Justification for radiological readings specified in SSES EAL EU1.
E-HU2	Confirmed security event with potential loss of level of safety of the ISFSI. <i>Op. Mode: Not Applicable</i>	None	<ul style="list-style-type: none"> EAL Threshold deleted by NRC bulletin 2005-02. ISFSI events are covered by EAL OA3 (HA8) or OS2 (HS4).

NEI Reference	INITIATING CONDITION	Susquehanna IC Designation	Deviations
FU1	ANY Loss or ANY Potential Loss of Containment. <i>Op. Modes: Power Operation, Hot Standby, Startup, Hot Shutdown</i>	FU1	<ul style="list-style-type: none"> In the loss or potential loss of Primary Containment added the term breach to the INITIATING CONDITION. The term breach provides additional indication of the fact that containment is or may be lost.
FA1	ANY Loss or ANY Potential Loss of EITHER Fuel Clad OR RCS <i>Op. Modes: Power Operation, Hot Standby, Startup, Hot Shutdown</i>	FA1	None
FS1	Loss or Potential Loss of ANY Two Barriers. <i>Op. Modes: Power Operation, Hot Standby, Startup, Hot Shutdown</i>	FS1	None
FG1	Loss of ANY Two Barriers AND Loss or Potential Loss of Third Barrier. <i>Op. Modes: Power Operation, Hot Standby, Startup, Hot Shutdown</i>	FG1	None
FU1 through FG1	"Site Specific" other indications of loss/potential loss of Fuel Clad, RCS or Containment Barrier	FU1 through FG1	<ul style="list-style-type: none"> Documentation of site specific analysis.
RCS Barrier	Drywell Pressure Indication of Loss of RCS Barrier	2.d.1	<ul style="list-style-type: none"> Added the qualifier "AND indication of a leak inside the drywell".
RCS Barrier	Drywell Radiation Monitoring	2.e	<ul style="list-style-type: none"> Added the qualifier "AND indication of a leak inside the drywell".
HU1	Natural and Destructive Phenomena Affecting the PROTECTED AREA. <i>Op. Modes: All</i>	OU5	<ul style="list-style-type: none"> Added the qualifier "sustained" to the EAL designation for wind speeds. EAL #7 is not used as there are no unique site specific phenomena for Susquehanna.

NEI Reference	INITIATING CONDITION	Susquehanna IC Designation	Deviations
HA1	Natural and Destructive Phenomena Affecting the PLANT VITAL AREA. <i>Op. Modes: All</i>	OA5	<ul style="list-style-type: none"> Added the qualifier "sustained" to the EAL designation for wind speeds. Clarified the site specific list of structures impacted in EAL 2 and 3
HU2	FIRE Within PROTECTED AREA Boundary Not Extinguished Within 15 Minutes of Detection. <i>Op. Modes: All</i>	OU6	None
HA2	FIRE or EXPLOSION Affecting the Operability of Plant Safety Systems Required to Establish or Maintain Safe Shutdown. <i>Op. Modes: All</i>	OA6	None
HU3	Release of Toxic or Flammable Gases Deemed Detrimental to Safe Operation of the Plant. <i>Op. Modes: All</i>	OU7	None
HA3	Release of Toxic or Flammable Gases Within or Contiguous to a VITAL AREA Which Jeopardizes Operation of Safety Systems Required to Establish or Maintain Safe Shutdown. <i>Op. Modes: All</i>	OA7	None
HU4	Confirmed Security Condition or Threat Which Indicates a Potential Degradation in the Level of Safety of the Plant. <i>Op. Modes: All</i>	OU1	<ul style="list-style-type: none"> The specific EAL for the ISFSI was deleted by NRC bulletin 2005-02. ISFSI events are covered by EAL OA3 (HA8) or OS2 (HS4) Security Condition or Threat used to match Terminology of SSSES Physical Security Plan
HA4	Confirmed Security Event in a Plant PROTECTED AREA. <i>Op. Modes: All</i>	OA1	None
HS1	Confirmed Security Event in a PLANT VITAL AREA. <i>Op. Modes: All</i>	OS1	None

NEI Reference	INITIATING CONDITION	Susquehanna IC Designation	Deviations
HG1	Security Event Resulting in Loss of Physical Control of the Facility. <i>Op. Modes: All</i>	OG1	<ul style="list-style-type: none"> EAL #1 is divided into two EALs, #1 and #2 for Susquehanna.
HS4	Site Attack <i>Op. Modes: All</i>	OS2	None
HA7	Notification of an airborne attack threat <i>Op. Modes: All</i>	OA2	None
HA8	Notification of HOSTILE ACTION within the OCA <i>Op. Modes: All</i>	OA3	None
HU5	Other Conditions Existing Which in the Judgment of the Emergency Director Warrant Declaration of a NOUE. <i>Op. Modes: All</i>	OU8	None
HA6	Other Conditions Existing Which in the Judgment of the Emergency Director Warrant Declaration of an Alert. <i>Op. Modes: All</i>	OA8	None
HS3	Other Conditions Existing Which in the Judgment of the Emergency Director Warrant Declaration of Site Area Emergency. <i>Op. Modes: All</i>	OS8	None
HG2	Other Conditions Existing Which in the Judgment of the Emergency Director Warrant Declaration of General Emergency. <i>Op. Modes: All</i>	OG8	None
HA5	Control Room Evacuation Has Been Initiated. <i>Op. Modes: All</i>	OA4	None
HS2	Control Room Evacuation Has Been Initiated and Plant Control Cannot Be Established. <i>Op. Modes: All</i>	OS4	None

NEI Reference	INITIATING CONDITION	Susquehanna IC Designation	Deviations
SU1	Loss of All Offsite Power to Essential Busses for Greater Than 15 Minutes. <i>Op. Modes: Power Operation, Startup, Hot Standby, Hot Shutdown</i>	MU1	<ul style="list-style-type: none"> NEI condition "b" is conservatively not included.
SA5	AC power capability to essential busses reduced to a single power source for greater than 15 minutes such that any additional single failure would result in station blackout. <i>Op. Modes: Power Operation, Startup, Hot Standby, Hot Shutdown</i>	MA1	<ul style="list-style-type: none"> Two EALs are used for this condition as a result of Susquehanna's specific design.
SS1	Loss of All Offsite Power and Loss of All onsite AC Power to Essential Busses. <i>Op. Modes: Power Operation, Startup, Hot Standby, Hot Shutdown</i>	MS1	<ul style="list-style-type: none"> The power restoration EAL specifies that two four kV buses on each unit must be restored within fifteen minutes
SG1	Prolonged Loss of All Offsite Power and Prolonged Loss of All onsite AC Power to Essential Busses. <i>Op. Modes: Power Operation, Startup, Hot Standby, Hot Shutdown</i>	MG1	<ul style="list-style-type: none"> In EAL 1, specified the entry condition as a loss of All 4kV busses on either unit are deenergized.
SA2	Failure of Reactor Protection System Instrumentation to Complete or Initiate an Automatic Reactor Scram Once a Reactor Protection System Setpoint Has Been Exceeded and Manual Scram Was Successful. <i>Op. Modes: Power Operation, Startup, Hot Standby</i>	MA3	None

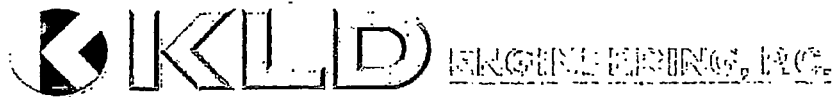
NEI Reference	INITIATING CONDITION	Susquehanna IC Designation	Deviations
SS2	Failure of Reactor Protection System Instrumentation to Complete or Initiate an Automatic Reactor Scram Once a Reactor Protection System Setpoint Has Been Exceeded and Manual Scram Was NOT Successful. <i>Op. Modes: Power Operation, Startup</i>	MS3	None
SG2	Failure of the Reactor Protection System to Complete an Automatic Scram and Manual Scram was NOT Successful and There is Indication of an Extreme Challenge to the Ability to Cool the Core. <i>Op. Modes: Power Operation, Startup</i>	MG3	None
SU2	Inability to Reach Required Shutdown Within Technical Specification Limits. <i>Op. Modes: Power Operation, Startup, Hot Standby, Hot Shutdown</i>	MU9	None
SA3	Deleted		None
SS4	Complete Loss of Heat Removal Capability. <i>Op. Modes: Power Operation, Startup, Hot Standby, Hot Shutdown</i>	MS4	None
SU3	UNPLANNED Loss of Most or All Safety System Annunciation or Indication in The Control Room for Greater Than 15 Minutes <i>Op. Modes: Power Operation, Startup, Hot Standby, Hot Shutdown</i>	MU5	None

NEI Reference	INITIATING CONDITION	Susquehanna IC Designation	Deviations
SA4	UNPLANNED Loss of Most or All Safety System Annunciation or Indication in Control Room With Either (1) a SIGNIFICANT TRANSIENT in Progress, or (2) Compensatory Non-Alarming Indicators are Unavailable. <i>Op. Modes: Power Operation, Startup, Hot Standby, Hot Shutdown</i>	MA5	None
SS6	Inability to Monitor a SIGNIFICANT TRANSIENT in Progress. <i>Op. Modes: Power Operation, Startup, Hot Standby, Hot Shutdown</i>	MS5	None
SU7	Deleted		None
SA1	Deleted		None
SS3	Loss of All Vital DC Power. <i>Op. Modes: Power Operation, Startup, Hot Standby, Hot Shutdown</i>	MS2	None
SU4	Fuel Clad Degradation. <i>Op. Modes: Power Operation, Startup, Hot Standby, Hot Shutdown</i>	MU7	None
SU5	RCS Leakage. <i>Op. Modes: Power Operation, Startup, Hot Standby, Hot Shutdown</i>	MU6	None
SS5	Deleted		None
SU6	UNPLANNED Loss of All ON SITE or Offsite Communications Capabilities. <i>Op. Modes: Power Operation, Startup, Hot Standby, Hot Shutdown</i>	MU8	None
SU8	Inadvertent Criticality. <i>Op Modes: Hot Standby, Hot Shutdown</i>	MU10	<ul style="list-style-type: none"> • SSES does not have installed startup rate meters.

APPENDIX G
SSES EVACUATION TIME ESTIMATES

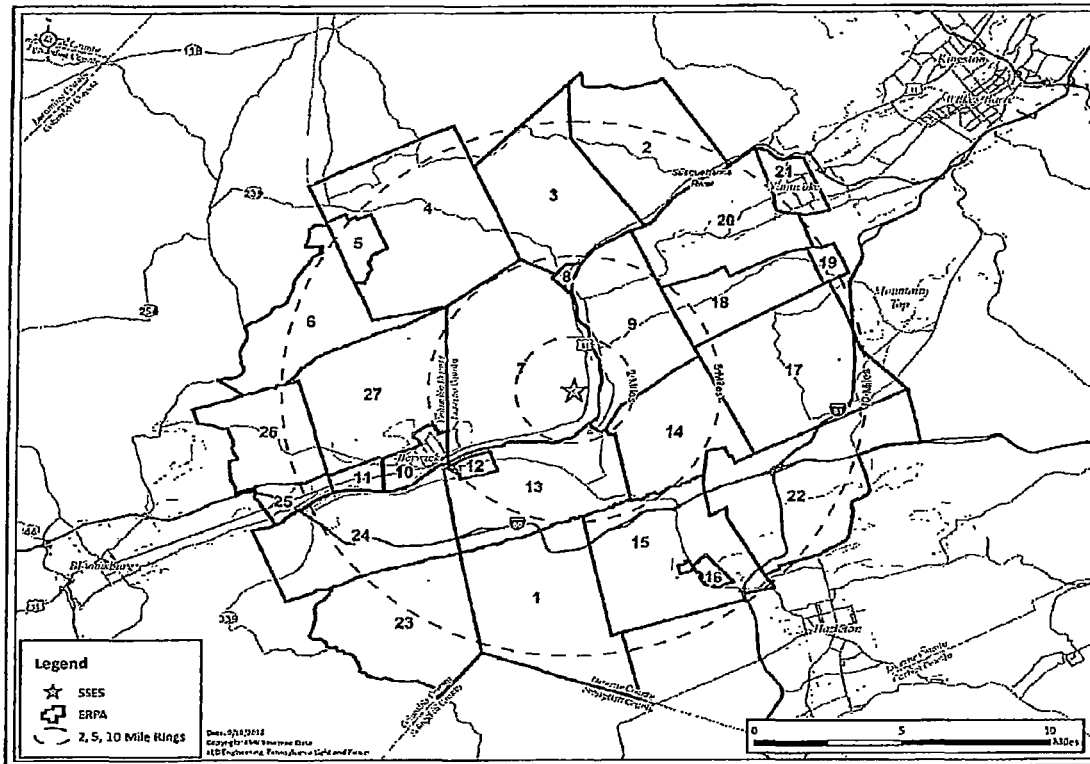
ORIGINAL DOCUMENT ISSUED 11/2012

NOTE: The information contained in Appendix G is a copy of the executive summary of the November 2012 Evacuation Time Estimate. The entire Evacuation Time Estimate can be found in the Susquehanna Information Management System which also stores the annual reviews.



Susquehanna Steam Electric Station

Development of Evacuation Time Estimates



Work performed for PPL Susquehanna, LLC, by:

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November, 2012

Final Report, Rev. 0

KLD TR – 527

EXECUTIVE SUMMARY

This report describes the analyses undertaken and the results obtained by a study to develop Evacuation Time Estimates (ETE) for the Susquehanna Steam Electric Station (SSES) located in Luzerne County, Pennsylvania. ETE are part of the required planning basis and provide PPL Susquehanna, LLC (PPL) and state and local governments with site-specific information needed for Protective Action decision-making.

In the performance of this effort, guidance is provided by documents published by Federal Governmental agencies. Most important of these are:

- Criteria for Development of Evacuation Time Estimate Studies, NUREG/CR-7002, November 2011.
- Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, NUREG-0654/FEMA-REP-1, Rev. 1, November 1980.
- Development of Evacuation Time Estimates for Nuclear Power Plants, NUREG/CR-6863, January 2005.
- 10CFR50, Appendix E – “Emergency Planning and Preparedness for Production and Utilization Facilities”

Overview of Project Activities

This project began in March, 2012 and extended over a period of 6 months. The major activities performed are briefly described in chronological sequence:

- Attended “kick-off” meetings with PPL personnel.
- Accessed U.S. Census Bureau data files for the year 2010. Studied Geographical Information Systems (GIS) maps of the area in the vicinity of the SSES, then conducted a detailed field survey of the highway network.
- Synthesized this information to create an analysis network representing the highway system topology and capacities within the Emergency Planning Zone (EPZ), plus a Shadow Region covering the region between the EPZ boundary and approximately 15 miles radially from the plant.
- Designed and sponsored a telephone survey of residents within the EPZ to gather focused data needed for this ETE study that were not contained within the census database. The survey used was carried out in 2008; it is still valid since there has not been a significant change in EPZ demographics. The survey instrument had been reviewed and modified by the licensee and offsite response organization (ORO) personnel prior to conducting the survey.
- Data collection forms (provided to PPL at the kickoff meeting) were returned with data

pertaining to employment, transients, and special facilities in each county.

- The traffic demand and trip-generation rates of evacuating vehicles were estimated from the gathered data. The trip generation rates reflected the estimated mobilization time (i.e., the time required by evacuees to prepare for the evacuation trip) computed using the results of the telephone survey of EPZ residents.
- Following federal guidelines, the EPZ is subdivided into 27 ERPA. These ERPA are then grouped within circular areas or "keyhole" configurations (circles plus radial sectors) that define a total of 30 Evacuation Regions.
- The time-varying external circumstances are represented as Evacuation Scenarios, each described in terms of the following factors: (1) Season (Summer, Winter); (2) Day of Week (Midweek, Weekend); (3) Time of Day (Midday, Evening); and (4) Weather (Good, Rain, Snow). One special event scenario - refueling at the plant - was considered. One roadway impact scenario was considered wherein a single lane was closed on Interstate 80 westbound for the duration of the evacuation.
- Staged evacuation was considered for those regions wherein the 2 mile radius and sectors downwind to 5 miles were evacuated.
- As per NUREG/CR-7002, the planning basis for the calculation of ETE is:
 - A rapidly escalating accident at the SSES that quickly assumes the status of General Emergency such that the Advisory to Evacuate is virtually coincident with the siren alert, and no early protective actions have been implemented.
 - While an unlikely accident scenario, this planning basis will yield ETE, measured as the elapsed time from the Advisory to Evacuate until the stated percentage of the population exits the impacted Region, that represent "upper bound" estimates. This conservative Planning Basis is applicable for all initiating events.
- If the emergency occurs while schools are in session, the ETE study assumes that the children will be evacuated by bus directly to reception centers or host schools located outside the EPZ. Parents, relatives, and neighbors are advised to not pick up their children at school prior to the arrival of the buses dispatched for that purpose. The ETE for schoolchildren are calculated separately.
- Evacuees who do not have access to a private vehicle will either ride-share with relatives, friends or neighbors, or be evacuated by buses provided as specified in the county evacuation plans. Those in special facilities will likewise be evacuated with public transit, as needed: bus, van, or ambulance, as required. Separate ETE are calculated for the transit-dependent evacuees, for homebound special needs population, and for those evacuated from special facilities.

Computation of ETE

A total of 420 ETE were computed for the evacuation of the general public. Each ETE quantifies the aggregate evacuation time estimated for the population within one of the 30 Evacuation

Regions to evacuate from that Region, under the circumstances defined for one of the 14 Evacuation Scenarios ($30 \times 14 = 420$). Separate ETE are calculated for transit-dependent evacuees, including school children for applicable scenarios.

Except for Region R03, which is the evacuation of the entire EPZ, only a portion of the people within the EPZ would be advised to evacuate. That is, the Advisory to Evacuate applies only to those people occupying the specified impacted region. It is assumed that 100 percent of the people within the impacted region will evacuate in response to this Advisory. The people occupying the remainder of the EPZ outside the impacted region may be advised to take shelter.

The computation of ETE assumes that 20% of the population within the EPZ but outside the impacted region, will elect to "voluntarily" evacuate. In addition, 20% of the population in the Shadow Region will also elect to evacuate. These voluntary evacuees could impede those who are evacuating from within the impacted region. The impedance that could be caused by voluntary evacuees is considered in the computation of ETE for the impacted region.

Staged evacuation is considered wherein those people within the 2-mile region evacuate immediately, while those beyond 2 miles, but within the EPZ, shelter-in-place. Once 90% of the 2-mile region is evacuated, those people beyond 2 miles begin to evacuate. As per federal guidance, 20% of people beyond 2 miles will evacuate (non-compliance) even though they are advised to shelter-in-place.

The computational procedure is outlined as follows:

- A link-node representation of the highway network is coded. Each link represents a unidirectional length of highway; each node usually represents an intersection or merge point. The capacity of each link is estimated based on the field survey observations and on established traffic engineering procedures.
- The evacuation trips are generated at locations called "zonal centroids" located within the EPZ and Shadow Region. The trip generation rates vary over time reflecting the mobilization process, and from one location (centroid) to another depending on population density and on whether a centroid is within, or outside, the impacted area.
- The evacuation model computes the routing patterns for evacuating vehicles that are compliant with federal guidelines (outbound relative to the location of the plant), then simulate the traffic flow movements over space and time. This simulation process estimates the rate that traffic flow exits the impacted region.

The ETE statistics provide the elapsed times for 90 percent and 100 percent, respectively, of the population within the impacted region, to evacuate from within the impacted region. These statistics are presented in tabular and graphical formats. The 90th percentile ETE have been identified as the values that should be considered when making protective action decisions because the 100th percentile ETE are prolonged by those relatively few people who take longer to mobilize. This is referred to as the "evacuation tail" in Section 4.0 of NUREG/CR-7002.

The use of a public outreach (information) program to emphasize the need for evacuees to

minimize the time needed to prepare to evacuate (secure the home, assemble needed clothes, medicines, etc.) should also be considered.

Traffic Management

This study references the comprehensive traffic management plans provided in the Luzerne and Columbia County Radiological Emergency Response Plans. Due to the detailed plans already in place and the limited traffic congestion within the EPZ, no additional traffic or access control measures have been identified as a result of this study.

Selected Results

A compilation of selected information is presented on the following pages in the form of figures and tables extracted from the body of the report; these are described below.

- Figure 6-1 displays a map of the SSES EPZ showing the layout of the 27 ERPA that comprise, in aggregate, the EPZ.
- Table 3-1 presents the estimates of permanent resident population in each ERPA based on the 2010 Census data.
- Table 6-1 defines each of the 30 Evacuation Regions in terms of their respective groups of ERPA.
- Table 6-2 lists the Evacuation Scenarios.
- Tables 7-1 and 7-2 are compilations of ETE. These data are the times needed to clear the indicated regions of 90 and 100 percent of the population occupying these regions, respectively. These computed ETE include consideration of mobilization time and of estimated voluntary evacuations from other regions within the EPZ and from the Shadow Region.
- Tables 7-3 and 7-4 presents ETE for the 2-mile region for un-staged and staged evacuations for the 90th and 100th percentiles, respectively.
- Table 8-7 presents ETE for the schoolchildren in good weather.
- Table 8-11 presents ETE for the transit-dependent population in good weather.
- Figure H-8 presents an example of an Evacuation Region (Region R08) to be evacuated under the circumstances defined in Table 6-1. Maps of all regions are provided in Appendix H.

Conclusions

- General population ETE were computed for 420 unique cases – a combination of 30 unique Evacuation Regions and 14 unique Evacuation Scenarios. Table 7-1 and Table 7-2 document these ETE for the 90th and 100th percentiles. These ETE range from 1:40 (hr:min) to 3:35 at the 90th percentile.
- Inspection of Table 7-1 and Table 7-2 indicates that the ETE for the 100th percentile are significantly longer than those for the 90th percentile. This is the result of the relatively long mobilization time of a small proportion of the resident population and congestion within the EPZ. When the system becomes congested, traffic exits the EPZ at rates somewhat below capacity until some evacuation routes have cleared. As more routes

clear, the aggregate rate of egress slows since many vehicles have already left the EPZ. Towards the end of the process, relatively few evacuees (those with the longest mobilization times) travel freely out of the EPZ. See Figures 7-8 through 7-21.

- Inspection of Table 7-3 and Table 7-4 indicates that a staged evacuation provides no benefits to evacuees from within the 2 mile region and unnecessarily delays the evacuation of those beyond 2 miles (compare Regions R25 through R30 and Regions R04 through R08 and R02, respectively, in Tables 7-1 and 7-2). See Section 7.6 for additional discussion.
- Comparison of Scenarios 6 and 13 in Table 7-1 indicates that the Special Event – refueling outage at the plant – does not have a significant impact on the ETE for the 90th percentile. See Section 7.5 for additional discussion.
- Comparison of Scenarios 1 and 14 in Table 7-1 indicates that the roadway closure – one lane westbound on I-80 from the interchange with SC 339 to the EPZ boundary – does not change the ETE, indicating that there is excess capacity on the highway. See Section 7.5.
- Nanticoke City and Briar Creek Borough and Township are the most congested areas during an evacuation. The last roadway in the EPZ to exhibit traffic congestion is SC 93. All links within the EPZ are at LOS A (free-flowing traffic conditions) at 3 hours and 20 minutes after the Advisory to Evacuate. See Section 7.3 and Figures 7-3 through 7-7.
- Separate ETE were computed for schools, medical facilities, transit-dependent persons, homebound special needs persons and correctional facilities. The average single-wave ETE for these sources are within a similar range as the general population ETE at the 90th percentile. See Section 8.
- Table 8-5 indicates that there are enough buses and wheelchair vans available to evacuate the transit-dependent population within the EPZ in a single wave; however, aid agreements with other counties will need to be activated in order to provide enough ambulances to evacuate the bedridden population in a single wave. See Sections 8.4 and 8.5.
- The general population ETE at the 90th percentile is insensitive to reductions in the base trip generation time of 4 hours since the mobilization time of the bulk of evacuees is unchanged by the truncation. See Table M-1.
- The general population ETE is relatively insensitive to the voluntary evacuation of vehicles in the Shadow Region (tripling the shadow evacuation percentage only increases 90th percentile ETE by 5 minutes). See Table M-2.
- Population changes between +30% or -46% are needed to result in ETE changes which meet the criteria for updating ETE between decennial Censuses. See Section M.3.

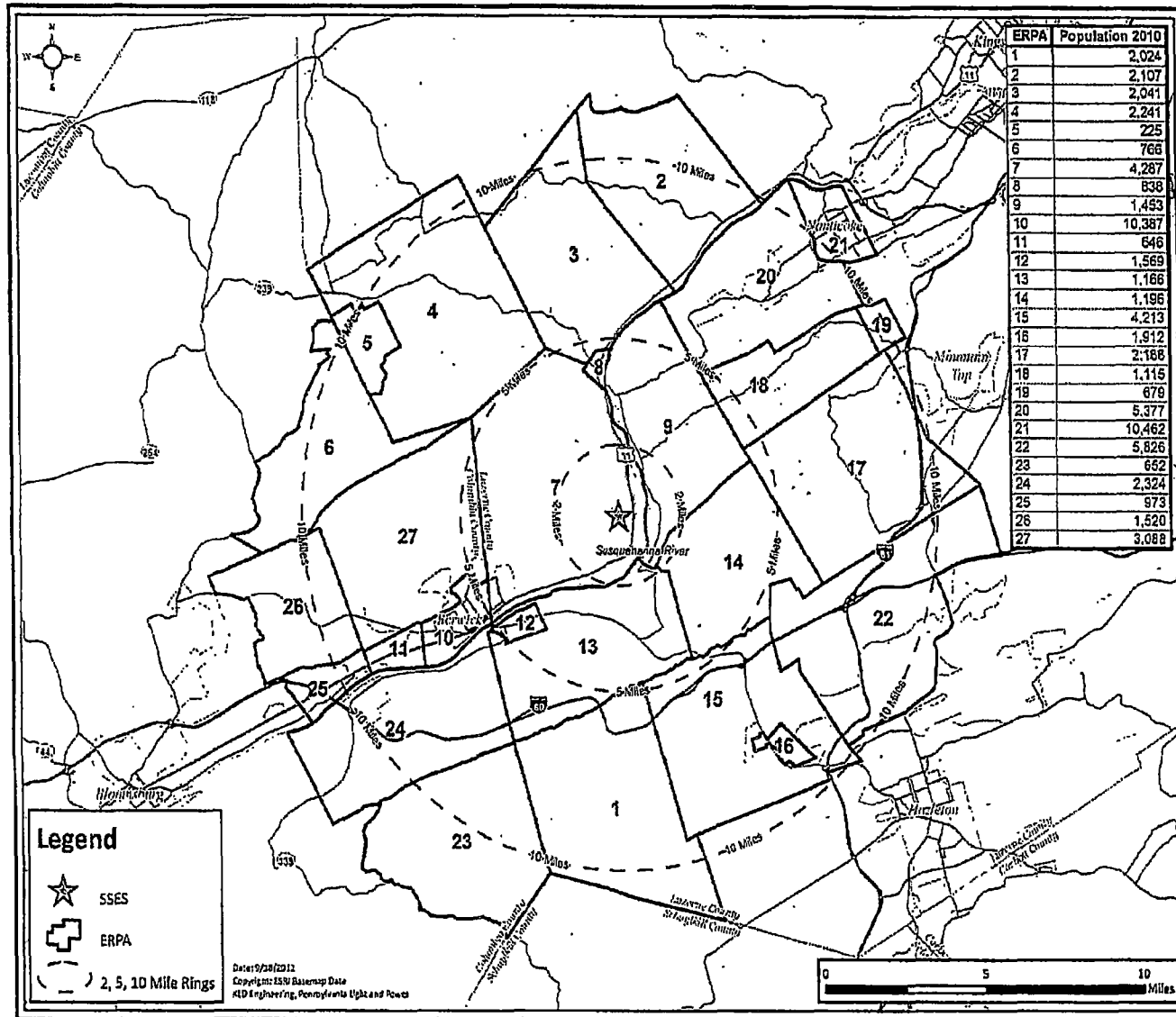


Figure 6-1. SSES EPZ ERPA

Table 3-1. EPZ Permanent Resident Population

ERPA	2000 Population	2010 Population
1	2,132	2,024
2	2,227	2,107
3	2,100	2,041
4	2,117	2,241
5	203	225
6	703	766
7	4,270	4,287
8	959	838
9	1,385	1,453
10	10,552	10,387
11	645	646
12	1,532	1,569
13	1,092	1,166
14	1,247	1,196
15	3,613	4,213
16	1,956	1,912
17	2,105	2,188
18	1,112	1,115
19	671	679
20	5,021	5,377
21	10,930	10,462
22	4,614	5,826
23	609	652
24	2,251	2,324
25	910	973
26	1,501	1,520
27	3,288	3,088
TOTAL	69,745	71,275
EPZ Population Growth:		2.19%

Table 6-1. Description of Evacuation Regions

Region	Description	ERPA																										
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27
R01	2-Mile Ring							X		X																		
R02	5-Mile Ring							X	X	X	X		X	X	X													
R03	Full EPZ	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Evacuate 2-Mile Radius and Downwind to 5 Miles																												
Region	Wind Direction To:	ERPA																										
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27
R04	NNW, N, NNE							X	X	X																		
	NE, W, WNW, NW	Refer to R01																										
R05	ENE, E, ESE							X		X					X													
R06	SE, SSE							X		X				X	X													
R07	S							X		X				X														
R08	SSW, SW, WSW							X		X			X	X														
Evacuate 5-Mile Radius and Downwind to the EPZ Boundary																												
Region	Wind Direction To:	ERPA																										
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27
R09	N		X	X	X			X	X	X	X		X	X	X						X							
R10	NNE		X	X				X	X	X	X		X	X	X				X		X	X						
R11	NE		X					X	X	X	X		X	X	X			X	X	X	X	X						
R12	ENE							X	X	X	X		X	X	X			X	X	X	X	X	X					
R13	E							X	X	X	X		X	X	X			X	X	X			X					
R14	ESE							X	X	X	X		X	X	X	X	X	X					X					
R15	SE							X	X	X	X		X	X	X	X	X						X					
R16	SSE	X						X	X	X	X		X	X	X	X	X						X					
R17	S	X						X	X	X	X		X	X	X	X	X							X				

Region	Description	ERPA																										
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27
R18	SSW	X						X	X	X	X		X	X	X									X	X			
R19	SW	X						X	X	X	X	X	X	X	X									X	X	X	X	X
R20	WSW						X	X	X	X	X	X	X	X	X									X	X	X	X	X
R21	W				X	X	X	X	X	X	X	X	X	X	X										X	X	X	X
R22	WNW				X	X	X	X	X	X	X		X	X	X											X	X	
R23	NW			X	X	X	X	X	X	X	X		X	X	X													X
R24	NNW		X	X	X	X		X	X	X	X		X	X	X													
Staged Evacuation - 2-Mile Radius Evacuates, then Evacuate Downwind to 5 Miles																												
Region	Wind Direction To:	ERPA																										
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27
R25	NNW, N, NNE							X	X	X																		
	NE, W, WNW, NW	Refer to R01																										
R26	ENE, E, ESE							X		X					X													
R27	SE, SSE							X		X				X	X													
R28	S							X		X				X														
R29	SSW, SW, WSW							X		X			X	X														
R30	5-Mile Ring							X	X	X	X		X	X	X													
Key																												
ERPA(s) Shelter-in-Place until 90% ETE for R01, then Evacuate							ERPA(s) Shelter-in-Place										ERPA(s) Evacuate											

Table 6-2. Evacuation Scenario Definitions

Scenario	Season ¹	Day of Week	Time of Day	Weather	Special
1	Summer	Midweek	Midday	Good	None
2	Summer	Midweek	Midday	Rain	None
3	Summer	Weekend	Midday	Good	None
4	Summer	Weekend	Midday	Rain	None
5	Summer	Midweek, Weekend	Evening	Good	None
6	Winter	Midweek	Midday	Good	None
7	Winter	Midweek	Midday	Rain	None
8	Winter	Midweek	Midday	Snow	None
9	Winter	Weekend	Midday	Good	None
10	Winter	Weekend	Midday	Rain	None
11	Winter	Weekend	Midday	Snow	None
12	Winter	Midweek, Weekend	Evening	Good	None
13	Winter	Midweek	Midday	Good	Refueling SSES
14	Summer	Midweek	Midday	Good	Roadway Impact – Lane Closure on I-80 WB

¹ Winter assumes that school is in session (also applies to spring and autumn). Summer assumes that school is not in session.

Table 7-1. Time to Clear the Indicated Area of 90 Percent of the Affected Population

	Summer		Summer		Summer	Winter			Winter			Winter	Winter	Summer
	Midweek		Weekend		Midweek Weekend	Midweek			Weekend			Midweek Weekend	Midweek	Midweek
Scenario:	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Region	Midday		Midday		Evening	Midday			Midday			Evening	Midday	Midday
	Good Weather	Rain	Good Weather	Rain	Good Weather	Good Weather	Rain	Snow	Good Weather	Rain	Snow	Good Weather	Special Event	Roadway Impact
Entire 2-Mile Region, 5-Mile Region, and EPZ														
R01	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
R02	2:00	2:10	1:55	2:00	1:55	2:05	2:10	2:40	1:55	2:00	2:30	1:55	2:05	2:00
R03	2:20	2:30	2:10	2:15	2:15	2:20	2:30	3:00	2:10	2:15	2:50	2:15	2:25	2:20
2-Mile Region and Keyhole to 5 Miles														
R04	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
R05	1:55	2:00	1:40	1:40	1:40	1:55	1:55	2:35	1:40	1:40	2:25	1:40	1:50	1:55
R06	2:00	2:00	1:40	1:40	1:40	2:00	2:00	2:40	1:40	1:40	2:25	1:40	1:55	2:00
R07	2:00	2:00	1:40	1:45	1:40	2:00	2:00	2:40	1:40	1:45	2:25	1:40	1:50	2:00
R08	2:00	2:00	1:40	1:40	1:40	2:00	2:00	2:40	1:40	1:40	2:25	1:40	1:55	2:00
5-Mile Region and Keyhole to EPZ Boundary														
R09	2:10	2:15	1:55	2:05	1:55	2:10	2:15	2:55	1:55	2:05	2:35	2:00	2:15	2:10
R10	2:15	2:25	2:05	2:15	2:05	2:15	2:25	3:00	2:10	2:15	2:50	2:10	2:25	2:15
R11	2:10	2:20	2:00	2:10	2:05	2:10	2:20	2:50	2:00	2:10	2:40	2:05	2:15	2:10
R12	2:05	2:10	1:55	2:00	2:00	2:05	2:10	2:45	1:55	2:00	2:30	2:00	2:05	2:05
R13	1:55	2:00	1:50	1:50	1:50	1:55	2:00	2:30	1:50	1:50	2:20	1:50	1:55	1:55
R14	1:55	2:00	1:50	1:50	1:50	1:55	2:00	2:30	1:50	1:50	2:20	1:50	1:55	1:55
R15	1:55	2:00	1:45	1:50	1:50	1:55	2:00	2:30	1:45	1:50	2:20	1:50	1:55	1:55
R16	1:55	2:00	1:50	1:50	1:50	1:55	2:00	2:30	1:45	1:50	2:20	1:50	1:55	1:55
R17	1:55	2:00	1:45	1:50	1:50	1:55	2:00	2:30	1:45	1:50	2:20	1:50	1:55	1:55
R18	2:05	2:10	1:55	2:00	2:00	2:05	2:10	2:40	1:55	2:00	2:30	2:00	2:05	2:05
R19	2:30	2:45	2:20	2:25	2:25	2:30	2:45	3:10	2:20	2:25	3:00	2:25	2:30	2:30
R20	2:35	2:40	2:20	2:30	2:25	2:35	2:50	3:15	2:20	2:30	3:05	2:25	2:30	2:35
R21	2:35	2:45	2:25	2:30	2:30	2:35	2:45	3:15	2:25	2:30	3:05	2:30	2:35	2:35
R22	2:30	2:40	2:20	2:30	2:20	2:30	2:40	3:10	2:20	2:25	3:00	2:20	2:30	2:30
R23	2:25	2:35	2:10	2:25	2:15	2:25	2:40	3:10	2:15	2:20	3:00	2:15	2:25	2:25
R24	2:10	2:15	1:55	2:05	1:55	2:10	2:15	2:45	1:55	2:05	2:35	1:55	2:10	2:10

	Summer		Summer		Summer	Winter			Winter			Winter	Winter	Summer
	Midweek		Weekend		Midweek Weekend	Midweek			Weekend			Midweek Weekend	Midweek	Midweek
Scenario:	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Region	Midday		Midday		Evening	Midday			Midday			Evening	Midday	Midday
	Good Weather	Rain	Good Weather	Rain	Good Weather	Good Weather	Rain	Snow	Good Weather	Rain	Snow	Good Weather	Special Event	Roadway Impact
Staged Evacuation - 2-Mile Region and Keyhole to 5 Miles														
R25	2:00	2:00	1:55	1:55	1:55	2:00	2:00	2:35	1:55	1:55	2:30	1:55	1:55	2:00
R26	2:05	2:05	2:00	2:00	2:00	2:00	2:00	2:35	2:00	2:00	2:35	2:00	2:00	2:05
R27	2:05	2:05	2:05	2:05	2:05	2:05	2:05	2:40	2:05	2:05	2:35	2:05	2:05	2:05
R28	2:05	2:05	2:00	2:00	2:00	2:05	2:05	2:40	2:00	2:00	2:35	2:00	2:00	2:05
R29	2:10	2:10	2:05	2:10	2:05	2:10	2:10	2:45	2:05	2:10	2:40	2:05	2:10	2:10
R30	2:50	2:55	2:45	2:50	2:45	2:50	2:55	3:35	2:45	2:50	3:30	2:45	2:50	2:50

Table 7-2. Time to Clear the Indicated Area of 100 Percent of the Affected Population

	Summer		Summer		Summer	Winter			Winter			Winter	Winter	Summer
	Midweek		Weekend		Midweek Weekend	Midweek			Weekend			Midweek Weekend	Midweek	Midweek
Scenario:	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Region	Midday		Midday		Evening	Midday			Midday			Evening	Midday	Midday
	Good Weather	Rain	Good Weather	Rain	Good Weather	Good Weather	Rain	Snow	Good Weather	Rain	Snow	Good Weather	Special Event	Roadway Impact
Entire 2-Mile Region, 5-Mile Region, and EPZ														
R01	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R02	4:05	4:05	4:05	4:05	4:05	4:05	4:05	4:35	4:05	4:05	4:35	4:05	4:05	4:05
R03	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
2-Mile Region and Keyhole to 5 Miles														
R04	4:05	4:05	4:05	4:05	4:05	4:05	4:05	4:35	4:05	4:05	4:35	4:05	4:05	4:05
R05	4:05	4:05	4:05	4:05	4:05	4:05	4:05	4:35	4:05	4:05	4:35	4:05	4:05	4:05
R06	4:05	4:05	4:05	4:05	4:05	4:05	4:05	4:35	4:05	4:05	4:35	4:05	4:05	4:05
R07	4:05	4:05	4:05	4:05	4:05	4:05	4:05	4:35	4:05	4:05	4:35	4:05	4:05	4:05
R08	4:05	4:05	4:05	4:05	4:05	4:05	4:05	4:35	4:05	4:05	4:35	4:05	4:05	4:05
5-Mile Region and Keyhole to EPZ Boundary														
R09	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R10	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R11	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R12	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R13	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R14	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R15	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R16	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R17	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R18	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R19	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R20	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R21	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R22	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R23	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10
R24	4:10	4:10	4:10	4:10	4:10	4:10	4:10	4:40	4:10	4:10	4:40	4:10	4:10	4:10

	Summer		Summer		Summer	Winter			Winter			Winter	Winter	Summer
	Midweek		Weekend		Midweek Weekend	Midweek			Weekend			Midweek Weekend	Midweek	Midweek
Scenario:	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Region	Midday		Midday		Evening	Midday			Midday			Evening	Midday	Midday
	Good Weather	Rain	Good Weather	Rain	Good Weather	Good Weather	Rain	Snow	Good Weather	Rain	Snow	Good Weather	Special Event	Roadway Impact
Staged Evacuation - 2-Mile Region and Keyhole to 5 Miles														
R25	4:05	4:05	4:05	4:05	4:05	4:05	4:05	4:35	4:05	4:05	4:35	4:05	4:05	4:05
R26	4:05	4:05	4:05	4:05	4:05	4:05	4:05	4:35	4:05	4:05	4:35	4:05	4:05	4:05
R27	4:05	4:05	4:05	4:05	4:05	4:05	4:05	4:35	4:05	4:05	4:35	4:05	4:05	4:05
R28	4:05	4:05	4:05	4:05	4:05	4:05	4:05	4:35	4:05	4:05	4:35	4:05	4:05	4:05
R29	4:05	4:05	4:05	4:05	4:05	4:05	4:05	4:35	4:05	4:05	4:35	4:05	4:05	4:05
R30	4:05	4:05	4:05	4:05	4:05	4:05	4:05	4:35	4:05	4:05	4:35	4:05	4:05	4:05

Table 7-3. Time to Clear 90 Percent of the 2-Mile Region

	Summer		Summer		Summer	Winter			Winter			Winter	Winter	Summer
	Midweek		Weekend		Midweek Weekend	Midweek			Weekend			Midweek Weekend	Midweek	Midweek
Scenario:	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Region	Midday		Midday		Evening	Midday			Midday			Evening	Midday	Midday
	Good Weather	Rain	Good Weather	Rain	Good Weather	Good Weather	Rain	Snow	Good Weather	Rain	Snow	Good Weather	Special Event	Roadway Impact
Entire 2-Mile Region, 5-Mile Region, and EPZ														
R01	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
R02	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
2-Mile Region and Keyhole to 5 Miles														
R04	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
R05	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
R06	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
R07	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
R08	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
Staged Evacuation - 2-Mile Region and Keyhole to 5 Miles														
R25	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
R26	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
R27	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
R28	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
R29	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55
R30	1:55	1:55	1:40	1:45	1:40	1:55	1:55	2:35	1:40	1:45	2:25	1:40	1:50	1:55

Table 7-4. Time to Clear 100 Percent of the 2-Mile Region

	Summer		Summer		Summer	Winter			Winter			Winter	Winter	Summer
	Midweek		Weekend		Midweek Weekend	Midweek			Weekend			Midweek Weekend	Midweek	Midweek
Scenario:	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Region	Midday		Midday		Evening	Midday			Midday			Evening	Midday	Midday
	Good Weather	Rain	Good Weather	Rain	Good Weather	Good Weather	Rain	Snow	Good Weather	Rain	Snow	Good Weather	Special Event	Roadway Impact
Entire 2-Mile Region, 5-Mile Region, and EPZ														
R01	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R02	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
2-Mile Region and Keyhole to 5 Miles														
R04	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R05	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R06	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R07	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R08	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
Staged Evacuation - 2-Mile Region and Keyhole to 5 Miles														
R25	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R26	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R27	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R28	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R29	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R30	4:00	4:05	4:00	4:00	4:00	4:00	4:05	4:35	4:00	4:00	4:30	4:00	4:00	4:00

Table 7-4. Time to Clear 100 Percent of the 2-Mile Region

	Summer		Summer		Summer	Winter			Winter			Winter	Winter	Summer
	Midweek		Weekend		Midweek Weekend	Midweek			Weekend			Midweek Weekend	Midweek	Midweek
Scenario:	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Region	Midday		Midday		Evening	Midday			Midday			Evening	Midday	Midday
	Good Weather	Rain	Good Weather	Rain	Good Weather	Good Weather	Rain	Snow	Good Weather	Rain	Snow	Good Weather	Special Event	Roadway Impact
Entire 2-Mile Region, 5-Mile Region, and EPZ														
R01	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R02	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
2-Mile Region and Keyhole to 5 Miles														
R04	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R05	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R06	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R07	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R08	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
Staged Evacuation - 2-Mile Region and Keyhole to 5 Miles														
R25	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R26	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R27	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R28	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R29	4:00	4:00	4:00	4:00	4:00	4:00	4:00	4:35	4:00	4:00	4:30	4:00	4:00	4:00
R30	4:00	4:05	4:00	4:00	4:00	4:00	4:05	4:35	4:00	4:00	4:30	4:00	4:00	4:00

Table 8-7. School Evacuation Time Estimates – Good Weather

School	Driver Mobilization Time (min)	Loading Time (min)	Dist. To EPZ Bdry (mi)	Average Speed (mph)	Travel Time to EPZ Bdry (min)	ETE (hr:min)	Dist. EPZ Bdry to H.S. (mi.)	Travel Time from EPZ Bdry to H.S. (min)	ETE to H.S. (hr:min)
COLUMBIA COUNTY SCHOOLS									
Beaver Main Elementary School	90	15	0.6	41.4	1	1:50	9.1	14	2:00
Berwick Middle School	90	15	7.7	13.2	36	2:25	16.2	25	2:50
Berwick Senior High School	90	15	7.7	13.2	36	2:25	15.0	23	2:45
Columbia Day Care Program	90	15	7.7	13.2	36	2:25	19.0	29	2:50
Fourteenth Street Elementary	90	15	7.3	12.3	36	2:25	14.7	23	2:45
Holy Family Consolidated School	90	15	6.2	8.3	45	2:30	19.0	29	3:00
New Story Elementary	90	15	6.7	12.3	33	2:20	15.4	24	2:45
Nescopeck Elementary School	90	15	8.2	33.2	15	2:00	15.4	24	2:25
Orange St Elementary School	90	15	6.1	15.1	25	2:10	16.2	25	2:35
Salem Elementary School	90	15	7.7	13.2	36	2:25	19.0	29	2:50
LUZERNE COUNTY SCHOOLS									
Drums Elementary/Middle School	90	15	1.8	44.3	3	1:50	8.1	13	2:05
GNA Educational Center	90	15	0.5	6.5	5	1:50	2.1	4	1:55
GNA Elementary School	90	15	0.5	6.5	5	1:50	2.1	4	1:55
Greater Nanticoke High School	90	15	0.5	6.5	5	1:50	2.1	4	1:55
Hunlock Creek Elementary School	90	15	4.7	9.5	30	2:15	17.9	27	2:45
Huntington Mills Elementary School	90	15	5.7	17.4	20	2:05	15.2	23	2:30
JFK Elementary School	90	15	0.5	6.5	5	1:50	2.1	4	1:55
K.M. Smith Elementary School	90	15	2.4	5.1	29	2:15	2.1	4	2:20
Keystone Job Corp High School	90	15	1.7	44.3	3	1:50	8.1	13	2:05
Muhlenberg Christian Academy	90	15	2.3	9.7	15	2:00	15.2	23	2:25
Northwest Area High School	90	15	5.7	42.1	9	1:55	19.7	30	2:25
Penn State Hazelton	90	15	0.8	32.4	2	1:50	24.1	37	2:25
Pope John Paul II Catholic School	90	15	1.4	4.7	19	2:05	2.1	4	2:10
Rice Elementary	90	15	Located outside of the EPZ				5.7	9	1:55
The Learning Station School	90	15	2.0	5.1	25	2:10	2.1	4	2:15
Valley Elementary/Middle School	90	15	2.7	37.2	5	1:50	8.0	12	2:05
Maximum for EPZ:						2:30	Maximum:		3:00
Average for EPZ:						2:05	Average:		2:25

Table 8-11. Transit-Dependent Evacuation Time Estimates – Good Weather

Route Number	Bus Number	Mobilization (min)	Route Length (miles)	One-Wave			ETE (hr:min)	Distance to Rec. Ctr. (miles)	Travel Time to Rec. Ctr. (min)	Two-Wave				
				Route Speed (mph)	Route Travel Time (min)	Pickup Time (min)				Unload (min)	Driver Rest (min)	Route Travel Time (min)	Pickup Time (min)	ETE (hr:min)
1	1	90	4.4	43.1	6	30	2:10	20.7	31	5	10	44	30	4:10
2	1,2	80	7.4	10.9	41	30	2:35	45.4	68	5	10	91	30	6:00
	3,4	90	7.4	11.2	40	30	2:40	45.4	68	5	10	91	30	6:05
	5,6	100	7.4	12.6	35	30	2:50	45.4	68	5	10	91	30	6:15
	7,8	110	7.4	12.9	34	30	2:55	45.4	68	5	10	91	30	6:20
	9,10,11	120	7.4	13.2	34	30	3:05	45.4	68	5	10	91	30	6:30
3	1	90	7.4	40.9	11	30	2:15	14.8	22	5	10	44	30	4:10
	2	120	7.4	41.5	11	30	2:45	14.8	22	5	10	43	30	4:40
4	1	90	4.2	26.7	9	30	2:10	43.2	65	5	10	76	30	5:20
5	1	90	10.1	13.0	46	30	2:50	30.2	45	5	10	76	30	5:40
	2	105	10.1	15.2	40	30	2:55	30.2	45	5	10	76	30	5:45
	3	120	10.1	16.5	37	30	3:10	30.2	45	5	10	76	30	6:00
6	1,2	90	4.6	42.3	7	30	2:10	16.1	24	5	10	37	30	4:00
	3,4	105	4.6	42.1	7	30	2:25	16.1	24	5	10	37	30	4:15
	5,6	120	4.6	42.1	7	30	2:40	16.1	24	5	10	37	30	4:30
7	1	90	2.5	32.8	4	30	2:05	14.8	22	5	10	30	30	3:45
	2	120	2.5	34.4	4	30	2:35	14.8	22	5	10	30	30	4:15
8	1	90	10.3	42.7	15	30	2:15	29.7	45	5	10	74	30	5:00
9	1	90	4.7	37.7	7	30	2:10	29.7	45	5	10	59	30	4:40
	2	120	4.7	37.7	7	30	2:40	29.7	45	5	10	59	30	5:10
10	1	90	4.2	40.5	6	30	2:10	34.3	51	5	10	64	30	4:55
11	1	90	17.0	36.5	28	30	2:30	17.0	26	5	10	73	30	4:55
12	1	90	4.3	13.0	20	30	2:20	28.1	42	5	10	54	30	4:45
	2	120	4.3	16.0	16	30	2:50	28.1	42	5	10	54	30	5:15
13	1	90	4.0	44.1	5	30	2:10	34.2	51	5	10	63	30	4:50
	2	120	4.0	44.2	5	30	2:40	34.2	51	5	10	63	30	5:20

Route Number	Bus Number	One-Wave						Two-Wave						
		Mobilization (min)	Route Length (miles)	Route Speed (mph)	Route Travel Time (min)	Pickup Time (min)	ETE (hr:min)	Distance to Rec. Ctr. (miles)	Travel Time to Rec. Ctr. (min)	Unload (min)	Driver Rest (min)	Route Travel Time (min)	Pickup Time (min)	ETE (hr:min)
14	1	90	5.5	43.5	8	30	2:10	34.4	52	5	10	66	30	4:55
	2	120	5.5	46.9	7	30	2:40	34.4	52	5	10	66	30	5:25
15	1,2	80	0.9	6.0	9	30	2:00	28.9	43	5	10	46	30	4:15
	3,4	90	0.9	6.6	8	30	2:10	28.9	43	5	10	46	30	4:25
	5,6	100	0.9	6.7	8	30	2:20	28.9	43	5	10	46	30	4:35
	7,8	110	0.9	7.3	7	30	2:30	28.9	43	5	10	46	30	4:45
	9,10,11	120	0.9	7.2	8	30	2:40	28.9	43	5	10	46	30	4:55
16	1	90	8.1	29.7	16	30	2:20	34.4	52	5	10	73	30	5:15
	2	120	8.1	34.8	14	30	2:45	34.4	52	5	10	73	30	5:40
17	1,2	90	4.4	17.2	15	30	2:20	28.4	43	5	10	56	30	4:45
	3,4	105	4.4	19.7	13	30	2:30	28.4	43	5	10	56	30	4:55
	5	120	4.4	25.0	11	30	2:45	28.4	43	5	10	56	30	5:10
18	1	90	1.1	55.0	1	30	2:05	28.4	43	5	10	45	30	4:20
19	1	90	1.0	35.2	2	30	2:05	30.3	45	5	10	49	30	4:25
20	1	90	8.0	11.7	41	30	2:45	34.4	52	5	10	76	30	5:40
	2	120	8.0	13.8	35	30	3:05	34.4	52	5	10	76	30	6:00
21	1	90	7.1	14.4	30	30	2:30	34.4	52	5	10	72	30	5:20
22	1	90	6.1	42.3	9	30	2:10	30.1	45	5	10	63	30	4:45
23	1	90	2.3	55.0	3	30	2:05	34.4	52	5	10	58	30	4:40
24	1,2	90	6.0	41.7	9	30	2:10	13.3	20	5	10	38	30	3:55
	3,4	120	6.0	43.3	8	30	2:40	13.3	20	5	10	37	30	4:25
25	1,2	90	7.0	18.9	22	30	2:25	29.7	44	5	10	64	30	5:00
	3,4	120	7.0	23.8	18	30	2:50	29.7	44	5	10	64	30	5:25
Maximum ETE:							3:10	Maximum ETE:						
Average ETE:							2:30	Average ETE:						

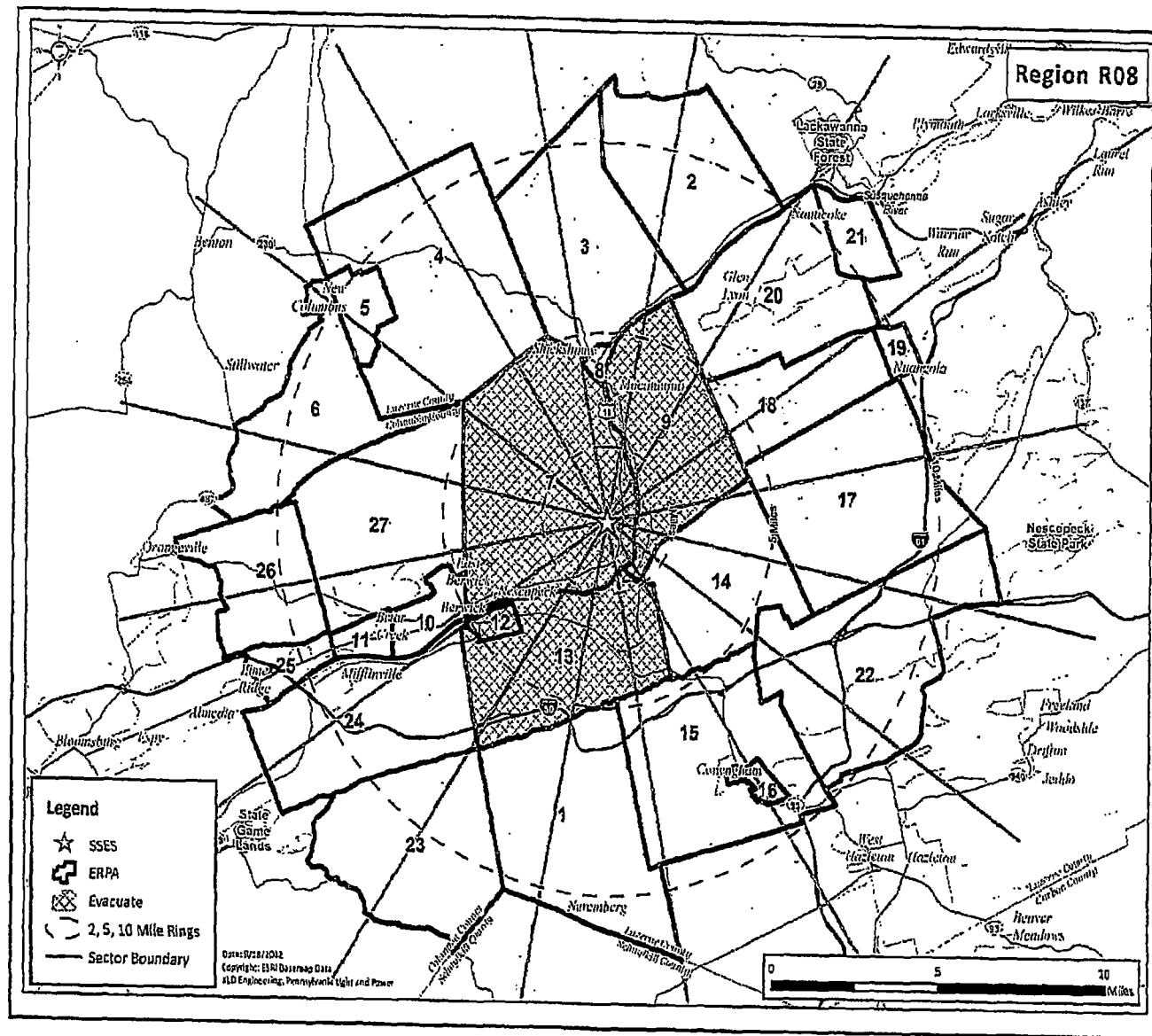


Figure H-8. Region R08

APPENDIX H

DOWNSTREAM SUSQUEHANNA RIVER WATER USAGE

APPENDIX H					
User's Name	Location-River Miles	Use	Class	Quantity (Mgd)	Comment
1. Keystone Water Co.	Berwick - 8.0	M	Sb	None	For emergency use only. Not used for 8 years. Pump removed. Serves about 20-25 thousand people.
2. Bloomsburg Water Co.	Bloomsburg - 19.4	M	Sb	0	
3. Campbell Soup Co.	Bloomsburg - 19.4	I	None	None	No use of river water.
4. Danville Borough	Danville - 27.4	M	Pr	1.8	Will expand use. Serves about 8,000 people.
5. Merck & Co.	Danville - 27.4	I	Pr	7-9	Serves about 500 people. Large quantity for cooling, small for process.
6. Danville State Hospital	Danville - 27.4	Pu	Pr	NA	Serves about 4,000 people. Receives water from Danville Borough. Only in emergencies.
8. Celotex Corp.	Sunbury - 38.5	I	None	None	Receives water from Sunbury Municipal Authority.
9. Sunbury (SES) - WPS	Sunbury - 38.5	I	Pr	245	
10. Shamokin Dam Municipal	Shamokin Dam - 44.4	M	Pr	NA	Serves about 2,000 people
11. Millersburg Water Co.	Millersburg - 69.4	M	Sb	NA	
12. Harrisburg Mun. Auth.	Harrisburg - 91.0	M	Sb	NA	
13. Bethlehem Steel Co.	Harrisburg - 91.0	I	NA	NA	
14. Borough of Steelton Water Co.	Steelton - 93.4	M	Pr	1.7	Allocated 5.0 Mgd
15. Metropolitan Edison (SES)	Middletown - 100.2	I	Pr	245	
16. Metropolitan Edison (HES)	York Haven - 105.2	I	Pr	11,782	
17. Talen (SES)	Brunner Island - 108.0	I	Pr	745	
18. Wrightsville Water Co.	Wrightsville - 119.0	M	Pr	NA	
19. Columbia Water Co.	Columbia - 119.0	M	Pr	1.8	
20. Lancaster Water Auth.	Lancaster - *	M	Pr	8.0	Based on old data, allocated 24.0 Mgd.
21. York Water Co.	York - *	M	Sb	NA	
22. Safe Harbor Water	Safe Harbor - 129.7	M	Pr	79,527	
23. Talen (HES)	Holtwood - 137.9	I	Pr	21,337	
24. Phila. Electric (PS)	Muddy Run - 140.4	I	Pr	12,931	
25. Phila. Electric (NS)	Peach Bottom - 143.0	I	NA	0.03	

APPENDIX H					
User's Name	Location-River Miles	Use	Class	Quantity (Mgd)	Comment
26. Phila. Electric & Susquehanna Power Co. (HES)	Conowingo - 154.3	I	Pr	53,018	
27. Chester Water Auth.	Chester - *	M	Sb	NA	
28. Baltimore Water Authority	Baltimore, MD - *	M	Sb	NA	
29. Havre-de-Grace Municipal Auth.	Havre-de-Grace, Md - *	M	Pr	1.4	
NOTE: River miles are from Susquehanna SES Site					
* Not on River					

LEGEND	
NA	Not Available
(SES)	Steam Electric Station
(HES)	Hydroelectric Station
(PS)	Pumping Station
(NS)	Nuclear Station
I	Industrial
M	Municipal
Pu	Public
Pr	Primary
Sb	Standby
Mgd	Million gallons per day

APPENDIX I
POPULATION UPDATE FOR SSES
EMERGENCY PLANNING ZONE

REFER TO THE EVACUATION TIME ESTIMATE IN APPENDIX G FOR THE CURRENT
POPULATION INFORMATION

APPENDIX J

NUREG-0654 PLANNING STANDARDS AND EVALUATION CRITERIA CROSS REFERENCE TO SSES EMERGENCY PLAN

NUREG-0654 PLANNING STANDARDS AND EVALUATION CRITERIA CROSS REFERENCE TO SSES EMERGENCY PLAN	
APPLICABLE NUREG-0654 SECTION	SSES EMERGENCY PLAN
A. Assignment of Responsibility	
1.a.	Chapter 6, Section 6.0
1.b.	Chapter 4 Chapter 6
1.c.	Chapter 6, Figures 6.2, 6.3, 6.6, 6.7 FSAR Figure 13.1-3
1.d.	Chapter 6, Sections 6.2, 6.2.1, 6.3, 6.3.1, 6.3.1.1
1.e.	Chapter 6, Sections 6.0, 6.1, 6.2, 6.2.3, 6.2.4, 6.2.5, 6.3, 6.3.1.2, 6.3.1.4, 6.3.1.5
3.	Appendix A
4.	Chapter 6, Sections 6.2.6, 6.3.1.3
B. Onsite Emergency Organization	
1.	Chapter 6, Sections 6.0 Phase I, II, III, 6.1, Tables 6.1, Figure 6.2, Figure 6.3
2.	Chapter 6, Sections 6.0, 6.1 Appendix E
3.	Chapter 6, Section 6.2.1
4.	Chapter 6, Section 6.2.1
5.	Chapter 6, Tables 6.1
6.	Chapter 6, Figure 6.7
7.a.	Chapter 6, Section 6.2.6
7.b.	Chapter 6, Section 6.2.5, 6.5
7.c.	Chapter 6, Section 6.2.1
7.d.	Chapter 6, Section 6.3.2.1
8.	Chapter 6, Table 6.2 Appendix A
9.	Chapter 6, Table 6.2 Appendix A

NUREG-0654 PLANNING STANDARDS AND EVALUATION CRITERIA CROSS REFERENCE TO SSES EMERGENCY PLAN	
APPLICABLE NUREG-0654 SECTION	SSES EMERGENCY PLAN
C. Emergency Response Support Resources	
1.a.	Chapter 6, Sections 6.2.1, 6.3.1.1, 6.4.3
1.b.	Chapter 6, Section 6.4.3
1.c.	Chapter 6, Section 6.4.3
2.b.	Chapter 6, Sections 6.2.1, 6.3.1.1
3.	Appendix D, Enclosure 5
4.	Appendix A, Table 6.2
D. Emergency Classifications	
1.	Chapter 5, Sections 5.1, 5.2, Appendix D, Appendix F, Tables F, R, M, E, O, C.
2.	Chapter 5, Table F, R, M, E, O, C.
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3.	Appendix C, Position Specific Instructions for: <ul style="list-style-type: none"> • Control Room Emergency Plan Communicator • TSC Emergency Plan Communicator • EOF Communicator
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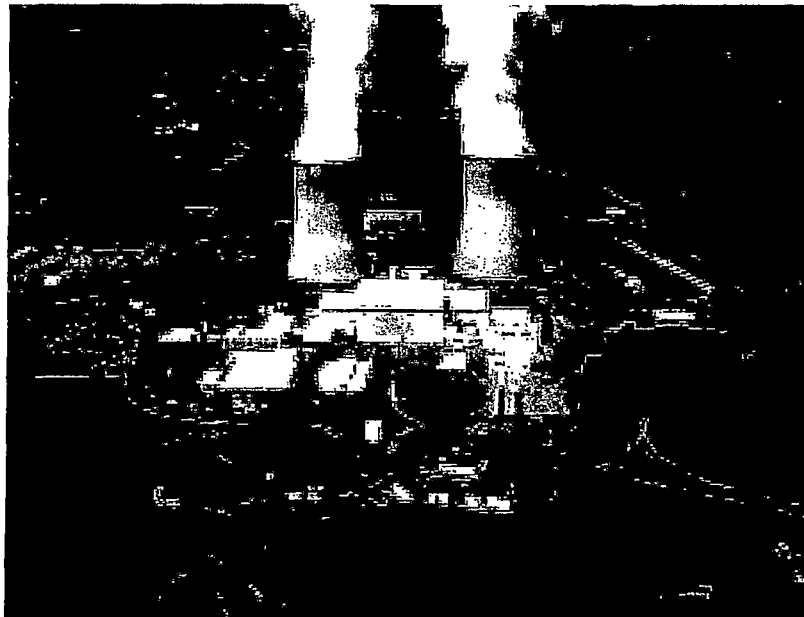
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On-Shift Staffing Analysis

APPENDIX K
On-Shift Staffing Analysis

On-Shift Staffing Analysis

Susquehanna Steam Electric Station



On-Shift Staffing Analysis Report

Revision 0

December 14, 2012

On-Shift Staffing Analysis

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On-Shift Staffing Analysis

Introduction

10 CFR 50 Appendix E, effective on December 23, 2011 directed that a detailed study be performed by December 24, 2012, to ensure on-shift staffing was adequate to perform critical functions until relieved by the augmented Emergency Response Organization (ERO). The NRC in the published staff guidance (Reference 2) endorsed NEI 10-05 as an acceptable means of performing the required staffing analysis. This report documents the result of that analysis for Susquehanna Steam Electric Station (SSES).

References

1. 10 CFR 50 Appendix E
2. NSIR/DPR-ISG-01, Interim Staff Guidance, Emergency Planning for Nuclear Power Plants
3. NEI 10-05, Revision 0, Assessment of On-Shift Emergency Response Organization Staffing and Capabilities
4. SSES Emergency Plan, Revision 53, Table 6.1, Station Emergency Plan Minimum Staffing Requirements
5. SSES FSAR, Chapter 15

Executive Summary

A detailed staffing analysis performed in accordance with NEI 10-05 was conducted to document the adequacy of shift staffing as required by 10 CFR 50 Appendix E.

The minimum staff described in Table 6.1 of the SSES Emergency Plan, Revision 53, was used to perform the on-shift staffing analysis. Table 1 of this report lists the on-shift staffing as described in Revision 53 of the SSES Emergency Plan.

NRC staff guidance directs the scenarios that must be used to demonstrate the adequacy of on-shift staffing to perform required functions for event mitigation, radiation protection response, firefighting, chemistry and Emergency Plan functions. Those scenarios include specific design basis events as described in the FSAR as well as specific scenarios defined in the staff guidance document. Table 2 identifies the scenarios that were examined.

The next phase required of NEI 10-05 requires a dedicated team using tabletop techniques examine the scenarios for conflicts between the functional areas that must be resolved by detailed procedural analysis. For those scenarios where no conflicts are identified in the specified areas no further actions are required. Table 2 also identifies the scenarios that required detailed analysis due to conflicts in response functions. Appendix A to this report documents the results of the procedural analysis. Appendix B includes the completed event scenario analysis tables.

The final phase of NEI 10-05, Time Motion Study (TMS), identifies any staffing conflicts with the minimum shift that must be resolved. The TMS for Susquehanna Steam Electric Station determined that staffing conflicts do not exist. Appendix C of this report summarizes the results of the TMS.

On-Shift Staffing Analysis

Conclusion

The minimum staff identified in Table 6.1 of the Susquehanna Steam Electric Station Emergency Plan, Revision 53, was adequate to respond to the scenarios identified in the regulations until relieved by the augmented ERO.

Table 1
Susquehanna Steam Electric Station On-Shift Staffing

SSES Emergency Plan, Rev 53 Table 6.1, Station Emergency Plan Minimum Staffing Requirements	
Position	On-Shift
Shift Manager (SM) ⁷	1
Unit Supervisor (SRO) ⁷	1
NRC Communicator (SRO) ^{1,7}	1
Plant Control Operators ⁷	3
E Plan Communicator ^{2,7}	1
Shift Technical Advisor (STA) ^{1,7}	1
Nuclear Plant Operator	4
HP Technician ³	2
Chemistry Technician ⁴	1
Total:	15
Fire Brigade ⁵	TRM
Rescue Operations/First Aid ⁶	2
Security	Sec plan

¹ One Unit Supervisor assigned to each unit. The unaffected Unit Supervisor or STA assumes the role of NRC Communicator.

² Two (2) Control Room Operators per unit. This number includes two (2) OATC Reactor Operators and two (2) BOP Reactor Operators. The unaffected unit BOP assumes the role of E Plan Communicator.

³ Two (2) HP Technicians on shift. One (1) HP Technician provides support as Dose Calculator (Offsite Dose Assessment). One (1) HP Technician provides support by providing in-plant surveys, job coverage, and personnel monitoring.

⁴ One (1) Chemistry Technician provides chemistry sampling support.

⁵ Fire Brigade is a collateral duty of Effluents Management requiring 5 personnel without safe shutdown responsibilities. The Fire Brigade consists of 1 Fire Brigade Leader (Field Unit Supervisor) and 4 Fire Brigade Members. Refer to NDAP-QA-0640, Attachment B – Effluents Management Responsibilities.

⁶ Rescue Operations/First Aid is a collateral duty of Fire Brigade and Security personnel.

⁷ Licensed Operators are trained and qualified as E Plan and NRC Communicators.

On-Shift Staffing Analysis

Table 2
Susquehanna Steam Electric Station DBA/ISG Analyzed Events

TMS Required	DBA/ISG Event #	Summary Description of Event or Accident
YES	1	Land and/or waterborne HOSTILE ACTION directed against the Protected Area by a HOSTILE FORCE. Adversary characteristics defined by the Design Basis Threat (DBT).
NO	2	Recirc Pump Shaft Seizure (No Classification – Phase II Analysis not required per NEI 10-05 guidance)
NO	3	Recirc Pump Shaft Break ¹
NO	4	Control Rod Drop
NO	5	Instrument Line Break ²
NO	6	Steam System Piping Break Outside Containment (MSLB)
NO	7	Loss of Coolant Accident inside Containment (with release exceeding PAGs and resulting PARs) ³
NO	8	Feedwater Line Break Outside Containment ²
NO	9	Fuel and Equipment Handling Accident ⁴
NO	10	ATWS
NO	11	Response actions for an "aircraft probable threat" in accordance with 10 CFR 50.54(hh)(1) and as discussed in RG 1.214
YES	12	Control room fire leading to evacuation and remote shutdown, as referenced in IN 95-48.
YES	13	Station Blackout (Current Licensing Basis)
NO	14	Appendix R Fire Response ⁵
NO	15	SAMG

¹ The SSES FSAR states that the Recirc Pump Shaft Break event is bounded by Event 2, Recirc Pump Shaft Seizure. Therefore, no Phase II Analysis is required.

² The SSES FSAR states that the Steam System Piping Break Outside Containment is more limiting than the Feedwater Line Break Outside Containment and the Instrument Line Break. Therefore, Event 6, Steam System Piping Break (MSLB), bounds these events and no Phase II Analysis is required.

³ DBA event designated as proceeding non-mechanistically to GE with release exceeding Protective Action Guides.

⁴ Fuel and Equipment Handling accident is not analyzed with the existing on-shift staff. The SSES FSAR states that this event involves fuel that is conditioned at least 24 hours after shutdown; therefore it is applicable to refueling conditions. Refueling operations are staffed for the evolution with additional operations, HP and support personnel.

⁵ Per SSES personnel, the Control Room fire with evacuation and remote shutdown is the bounding Appendix R fire scenario; therefore, no further analysis of this event is required.

On-Shift Staffing Analysis

**Appendix A
Phase II Analysis Results**

On-Shift Staffing Analysis

A multi-disciplined team of subject matter experts from Susquehanna Steam Electric Station was assembled September 10-12, 2012 to provide input into the shift staffing analysis of events identified by NSIR/DPR-ISG-01, Interim Staff Guidance, Emergency Planning for Nuclear Power Plants. This team consisted of: a Shift Technical Advisor (SRO Certified); Chemistry Foreman; an HP Supervisor; a Fire Protection Engineer; a Security Coordinator; and Emergency Planning staff (station and consultants). The team provided analysis support during the Phase II analysis as follows:

On-Shift Staffing Analysis Team	
Team Member	Subject Matter Expertise
Shift Technical Advisor	Emergency Operating Procedure (EOP) actions for SROs, NPOs, and PCOs
	Off-Normal Operating Procedure (ONOP) actions for SROs, NPOs, and PCOs
	Operating Procedure actions
	Site Emergency Director (E Plan) Actions
	Fire response actions
	Control Room Communicator (NRC Communications) actions
Fire Protection Engineer	Fire Brigade Response actions
Chemistry Foreman	Chemistry Technician response actions
HP Supervisor	HP Technician response actions
Security Coordinator	Security Response actions
	Accountability Response actions
Emergency Planning	Emergency Plan response actions
	Site Emergency Director (E Plan) Actions

The Phase II Analysis was conducted in three steps: identification of events for analysis; minimum shift staffing complement determination; and, a table top analysis of the on-shift staffing resources required for response to the identified events. The team reviewed a total of nine (9) events. The results and recommendations of the Phase II Shift Staffing Analysis are documented in this report.

Phase II Preliminary Conclusions

1. Operations Conflicts – Time Motion Study (TMS) is required for the STA position due to competing ON/EOP procedure actions and assigned Emergency Plan functions/tasks. The TMS will determine if these functions can be performed by the STA during an event.

Phase II Recommendations:

1. Determine the most effective methodology to perform remaining scenarios requiring detailed time motion studies (Simulator based Drill, timed in-plant response, combinations, other).
2. Schedule and conduct Phase III analysis for the following events:
 - a. Design Basis Threat
 - b. Control Room Fire with Evacuation and Remote Shutdown
 - c. Station Blackout

On-Shift Staffing Analysis

**Appendix B
Phase II Event Analysis Tables**

On-Shift Staffing Analysis**Phase II Event Analysis Table Index**

Analysis (Scenario Number)	FSAR DBA/ ISG Event # (Appendix A)	Title	Source	Page Number
<u>1</u>	<u>1</u>	Design Basis Threat	ISG	<u>11</u>
<u>2</u>	<u>4</u>	Control Rod Drop	FSAR Limiting Fault Event	<u>20</u>
<u>3</u>	<u>6</u>	Steam System Piping Break Outside Containment (MSLB)	FSAR Condition IV Event	<u>29</u>
<u>4</u>	<u>7</u>	Loss of Coolant Accident inside Containment (with release exceeding PAGs and resulting in PARs)	ISG/FSAR Limiting Fault Event	<u>38</u>
<u>5</u>	<u>10</u>	ATWS	ISG/FSAR Limiting Fault Event	<u>46</u>
<u>6</u>	<u>11</u>	Response actions for an "aircraft probable threat" in accordance with 10 CFR 50.54(hh)(1) and as discussed in RG 1.214	ISG	<u>54</u>
<u>7</u>	<u>12</u>	Control room fire leading to evacuation and remote shutdown, as referenced in IN 95-48.	ISG	<u>62</u>
<u>8</u>	<u>13</u>	Station Blackout (Current Licensing Basis)	ISG	<u>71</u>
<u>9</u>	<u>15</u>	SAMG	ISG	<u>80</u>

On-Shift Staffing Analysis**On-Shift Personnel Assignments Used During Phase II Analysis**

Position	Designation	Assignment
Shift Manager	Shift Manager	Shift Manager/Emergency Director
Unit Supervisor	SRO #1	Unit 1 Shift Supervisor
Unit Supervisor	SRO #2	Unit 2 Shift Supervisor
Field Unit Supervisor	FBL	Fire Brigade Leader
Shift Technical Advisor	STA	Shift Technical Advisor
Plant Control Operator	PCO #1	Unit 1 Operator At Controls (OATC)
Plant Control Operator	PCO #2	Unit 1 Balance of Plant (BOP - Communicator)
Plant Control Operator	PCO #3	Unit 2 Operator At The Controls (OATC)
Plant Control Operator	PCO #4	Unit 2 Balance of Plant (BOP - Communicator)
Nuclear Plant Operator	NPO #1	Unit 1 Reactor Building NPO
Nuclear Plant Operator	NPO #2	Unit 2 Reactor Building NPO
Nuclear Plant Operator	NPO #3	Unit 1 Turbine Building NPO
Nuclear Plant Operator	NPO #4	Unit 2 Turbine Building NPO

Other On-Shift Assignments Used During Analysis

Position	Designation	Assignment
HP Technician	HP #1	Offsite Dose Assessment
HP Technician	HP #2	HP Support
Chemistry Technician	Chem #1	Chemistry Sampling
Effluents Handyman #1	FBM #1	Fire Brigade Member/Effluents
Effluents Handyman #2	FBM #2	Fire Brigade Member/Effluents
Effluents Handyman #3	FBM #3	Fire Brigade Member/Effluents
Effluents Handyman #4	FBM #4	Fire Brigade Member/Effluents

On-Shift Staffing Analysis
Event Timelines and Assumptions

Event #1 Design Basis Threat

Initial Conditions:

Time: Sunday @0230

Unit @ 100% Power

RCS @ normal operating temperature and pressure

Sequence of Events:

0235 Adversary force assaults SSES and attempts to breach the protected area fence

Security engages adversaries and notifies Shift Manager

0236 CR personnel initiate Security Event response AOP

Rx manually tripped

On-site protective actions initiated

Emergency Plan entered

0240 Security informs Shift Manager that PA has been breached

0245 Security informs Shift Manager that adversaries have been neutralized

No injuries to site personnel

No fires or collateral damage to plant equipment

No adverse consequences to plant safety

On-Shift Staffing Analysis**Appendix B**

Analysis #1: DBA/ISG Event #1 - Design Basis Threat
TABLE 1 – On-shift Positions

ECL: Site Area Emergency

Line	On-shift Position	Emergency Plan Reference	Augmentation Elapsed Time (min)	Role in Table#/Line#	Unanalyzed Task?	TMS Required?
1.	Shift Manager	SSES E Plan Table 6.1	N/A	T2/L1 T5/L1 T5/L3 T5/L8	NO	NO
2.	Unit Supervisor (SRO #1) ¹	SSES E Plan Table 6.1	N/A	T2/L2	NO	NO
3.	Unit Supervisor (SRO #2) ¹	SSES E Plan Table 6.1	N/A	T2/L3	NO	NO
4.	Shift Technical Advisor (STA)	SSES E Plan Table 6.1	N/A	T2/L4 T5/L6 T5/L7 T5/L10 T5/L11 T5/L13	NO	YES
5.	Plant Control Operator (PCO #1)	SSES E Plan Table 6.1	N/A	T2/L5	NO	NO
6.	Plant Control Operator (PCO #2) ²	SSES E Plan Table 6.1	N/A	T2/L6 T5/L5 T5/L9 ³	NO	NO
7.	Plant Control Operator (PCO #3)	SSES E Plan Table 6.1	N/A	T2/L7	NO	NO

On-Shift Staffing Analysis

Line	On-shift Position	Emergency Plan Reference	Augmentation Elapsed Time (min)	Role in Table#/Line#	Unanalyzed Task?	TMS Required?
8.	Plant Control Operator (PCO #4) ²	SSES E Plan Table 6.1	N/A	T2/L8	NO	NO
9.	Nuclear Plant Operator (NPO #1)	SSES E Plan Table 6.1	N/A	T2/L9	NO	NO
10.	SAS Operator	SSES E Plan Table 6.1	N/A	T5/L14	NO	NO

Notes: ¹ Unaffected Unit Supervisor functions as the NRC Communicator

² Unaffected Unit Plant Control Operator functions as E Plan Communicator

³ Refer to Table 2A – PCO available to perform Emergency Plan actions after ON/EOP actions

On-Shift Staffing Analysis**TABLE 2 - Plant Operations & Safe Shutdown**Analysis # 1

Two Units - One Control Room (Shared)
Minimum Operations Crew Necessary to Implement
ONs and EOPs, or SAMGs if applicable

Applicable to unit 1 & 2

Line	Generic Title/Role	On-Shift Position	Task Performance Validation
1.	Shift Manager	Shift Manager	Operator Training
2.	Shift Supervisor	Unit Supervisor (SRO #1)	Operator Training
3.	Shift Supervisor	Unit Supervisor (SRO #2)	Operator Training
4.	Shift Technical Advisor	Shift Technical Advisor (STA)	Operator Training
5.	Reactor Operator #1	Plant Control Operator (PCO #1)	Operator Training
6.	Reactor Operator #2	Plant Control Operator (PCO #2)	Operator Training
7.	Reactor Operator #3	Plant Control Operator (PCO #3)	Operator Training
8.	Reactor Operator #4	Plant Control Operator (PCO #4)	Operator Training
9.	Auxiliary Operator #1	Nuclear Plant Operator (NPO #1)	Operator Training

Notes: See Table 2A for ON/EOP actions

On-Shift Staffing Analysis **Analysis #1, Table 2A – ON/EOP Actions**

Design Basis Threat			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
ON-000-101 Attach C	Intruder Flow Cart	SRO 1	X											
Step 3.9	PA Announcement	PCO2	X											
Step 3.7	Notify NRC	STA		X										
Step 3.11	Rx Scram	PCO1 PCO3	X											
Attach C	Staff RS/DP	SRO2 PCO4												
EO-100-102 EO-200-102	RPV Control	SRO1												
Step RC2	Verify Control Rods In	PCO 1 PCO 3	X											
RC/L-1	Isolations ECCS Initiations DGs Start	PCO 2 PCO 4	X											
RC/L-8	Reset Main Gen Lockouts	PCO 2 PCO 4	X											
RC/L-4	Control Rx Water Level	PCO 1 PCO 3	X											
RC/P-7	Cool down/Lower Pressure Using BPV	PCO 1 PCO 3												
ON-100-101 ON-200-101	Scram Imminent Actions	PCO1,2,3,4	X											
	Perform Scram Actions until transition to SD	PCO 1 PCO 3												

On-Shift Staffing Analysis

Design Basis Threat			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
ON-000-010 Attach C	Max CRD	PCO 1 PCO 3		X										
ON-000-010 Attach C	Isolate RWCU	PCO 1 PCO 3		X										
	Eval EPlan Entry	SM and STA	X											
Attach G Mitigation List	Start ESW and DGs	PCO 2		X										
	Start SCC DG	NPO 1			X									
	Start Supp Pool Cooling	PCO 2			X									

On-Shift Staffing Analysis

TABLE 3 – Firefighting

Analysis # 1

Line	Performed By	Task Analysis Controlling Method
1.	N/A	N/A
2.	N/A	N/A
3.	N/A	N/A
4.	N/A	N/A
5.	N/A	N/A

Notes: No Fire Brigade response required for this event

On-Shift Staffing Analysis

TABLE 4 – Radiation Protection & Chemistry

Analysis # 1

Line	Position Performing Function/Task	Performance Time Period After Emergency Declaration (minutes)																	
		0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60	60-65	65-70	70-75	75-80	80-85	85-90
1.	In-Plant Survey (OSC) On-Shift Position: HP																		
2.	In-Plant Survey (TSC) On-Shift Position: HP																		
3.	Personnel Monitoring On-Shift Position:																		
4.	Job Coverage On-Shift Position:																		
5.	Offsite Radiological Assessment On-Shift Position: HP #1																		
6.	Other Site-Specific HP – Describe: On-Shift Position:																		
7.	Chemistry function/task #1 – Describe: Support Field Monitoring Team On-Shift Position: Chem #1																		
8.	Chemistry function/task #2 – Describe: On-Shift Position: Chem #1																		

Notes: No HP/Chemistry actions due to "Duck and Cover " mode

On-Shift Staffing Analysis**TABLE 5 – Emergency Plan Implementation****Analysis # 1**

Line	Function/Task	On-Shift Position	Task Analysis Controlling Method
1.	Declare the Emergency Classification Level (ECL)	Shift Manager	EP/Ops Training and EP Drill Program
2.	Approve Offsite Protective Action Recommendations	N/A	N/A
3.	Approve content of State/local notifications	Shift Manager	EP/Ops Training and EP Drill Program
4.	Approve extension to allowable dose limits	N/A	N/A
5.	Notification and direction to on-shift staff (e.g., to assemble, evacuate, etc.)	PCO #2	EP/Ops Training and EP Drill Program
6.	ERO notification	STA	EP/Ops Training and EP Drill Program
7.	Abbreviated NRC notification for DBT event	STA	EP/Ops Training and EP Drill Program
8.	Complete State/local notification form	Shift Manager	EP/Ops Training and EP Drill Program
9.	Perform State/local notifications	PCO #2	EP Training and EP Drill Program
10.	Complete NRC event notification form	STA	EP/Ops Training and EP Drill Program
11.	Activate ERDS	STA	EP/Ops Training and EP Drill Program
12.	Offsite radiological assessment	N/A	N/A
13.	Perform NRC notifications	STA	EP/Ops Training and EP Drill Program
14.	Perform other site-specific event notifications (e.g., INPO, ANI, etc.)	SAS ¹	EP/Security Training and EP Drill Program
15.	Personnel accountability	N/A	N/A

Notes: Site Area Emergency EAL OS2
EP-PS-100 Emergency Director, Control Room

¹Security notifies LLEA/FBI

On-Shift Staffing Analysis

Event Timelines and Assumptions

Event #4 Control Rod Drop

Initial Conditions:

Time: Tuesday @ 0430

Unit 2 Hot Standby, NOP & NOT

Sequence of Events:

0430 Mechanical failure causes central Control Rod to drop
Valid off-gas pre-treatment High/High RAD Alarm received in Control Room
ARM 50 & 51 (CRD North & South) High Alarms received
ARM 48 (HPCI Turbine Room) in Alarm
ARM 57 (RCIC Room) in Alarm
Upgrade to Alert based on ARM 48 & 57 Alarms

On-Shift Staffing Analysis

Appendix B

Analysis #2: DBA/ISG Event #4 - Control Rod Drop

ECL: Unusual Event → Alert

TABLE 1 – On-shift Positions

Line	On-shift Position	Emergency Plan Reference	Augmentation Elapsed Time (min)	Role in Table#/Line#	Unanalyzed Task?	TMS Required?
1.	Shift Manager	SSES E Plan Table 6.1	N/A	T2/L1 T5/L1 T5/L3 T5/L8	NO	NO
2.	Unit Supervisor (SRO #1) ¹	SSES E Plan Table 6.1	N/A	T5/L6 T5/L10 T5/L11 T5/L13	NO	NO
3.	Unit Supervisor (SRO #2) ¹	SSES E Plan Table 6.1	N/A	T2/L2	NO	NO
4.	Shift Technical Advisor (STA)	SSES E Plan Table 6.1	N/A	T2/L3	NO	NO
5.	Plant Control Operator (PCO #2) ²	SSES E Plan Table 6.1	N/A	T5/L5 T5/L9	NO	NO
6.	Plant Control Operator (PCO #3)	SSES E Plan Table 6.1	N/A	T2/L4	NO	NO
7.	Plant Control Operator (PCO #4) ²	SSES E Plan Table 6.1	N/A	T2/L5	NO	NO
8.	Nuclear Plant Operator (NPO #2)	SSES E Plan Table 6.1	N/A	T2/L6	NO	NO
9.	Nuclear Plant Operator (NPO #4)	SSES E Plan Table 6.1	N/A	T2/L7	NO	NO
10.	HP Technician (HP #1)	SSES E Plan Table 6.1	60	T4/L5	NO	NO
11.	HP Technician (HP #2)	SSES E Plan Table 6.1	60	T4/L2	NO	NO
12.	Chemistry Technician (Chem #1)	SSES E Plan Table 6.1	60	T4/L7	NO	NO

Notes: ¹ Unaffected Unit Supervisor functions as the NRC Communicator² Unaffected Unit Plant Control Operator functions as E Plan Communicator

On-Shift Staffing Analysis**TABLE 2 - Plant Operations & Safe Shutdown****Analysis # 2****Two Units - One Control Room (Shared)****Applicable to unit 2****Minimum Operations Crew Necessary to Implement
ONs and EOPs, or SAMGs if applicable**

Line	Generic Title/Role	On-Shift Position	Task Performance Validation
1.	Shift Manager	Shift Manager	Operator Training
2.	Shift Supervisor	Unit Supervisor (SRO #2)	Operator Training
3.	Shift Technical Advisor	Shift Technical Advisor (STA)	Operator Training
4.	Reactor Operator #3	Plant Control Operator (PCO #3)	Operator Training
5.	Reactor Operator #4	Plant Control Operator (PCO #4)	Operator Training
6.	Auxiliary Operator #2	Nuclear Plant Operator (NPO #2)	Operator Training
7.	Auxiliary Operator #4	Nuclear Plant Operator (NPO #4)	Operator Training

Notes: See Table 2A for ON/EOP actions

On-Shift Staffing Analysis
Analysis #2, Table 2A – ON/EOP Actions

Control Rod Drop (Unit #2)

Procedure Step/Actions			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
ON-200-102	Place Mode Switch in S/D	PCO 3	X											
EO-200-102, 103 and 104 GO-200-004	RPV Control	SRO 2												
Step RC2	Verify Control Rods In	PCO 3	X											
RC/L-1	Isolations ECCS Initiations DGs Start	PCO 4	X											
RC/L-8	Reset Main Gen Lockouts	PCO 3	X											
ON-279-001	Close MSIV and MSL Drains	PCO 4	X											
ON-279-001	Remove SJAE from service	PCO 4	X											
RC/L-4	Control Rx Water Level with HPIC RCIC	PCO 4	X											
RC/P-6	Maintain Pressure with SRVs	PCO 4												
RC/P-7	Lower pressure using SRVs	PCO 4												
RC/L-4	Restore Condensate injection and control RPV water level	PCO3												
EO-200-103	Place RHR In supp pool cooling	PCO 3		X										
ON-200-101	Perform Scram Actions until transition to SD	PCO 3 PCO 4												
ON-159-002	Verify Isolations	PCO 3	X											
GO-200-004	Performing SD actions	NPO 2 NPO 4 PCO 3												

On-Shift Staffing Analysis

Control Rod Drop (Unit #2)

Procedure Step/Actions			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
		PCO 4												
EO-200-104	Monitoring Rx Bldg RAD levels and Temp	SRO 2 PCO 3												
	Start ESW and All coolers with cooling sources	PCO 3				X								
	Announce Evac of U2 Rx Bldg	PCO 2	X											

On-Shift Staffing Analysis

TABLE 3 – Firefighting

Analysis # 2

Line	Performed By	Task Analysis Controlling Method
1.	N/A	N/A
2.	N/A	N/A
3.	N/A	N/A
4.	N/A	N/A
5.	N/A	N/A

Notes: No Fire Brigade response required for this event.

On-Shift Staffing Analysis

TABLE 4 – Radiation Protection & Chemistry

Analysis # 2

Line	Position Performing Function/Task	Performance Time Period After Emergency Declaration (minutes)																	
		0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60	60-65	65-70	70-75	75-80	80-85	85-90
1.	In-Plant Survey On-Shift Position: HP																		
2.	Out of Plant Survey On-Shift Position: HP #2		X	X	X	X	X	X	X	X	X	X	X						
3.	Personnel Monitoring On-Shift Position:																		
4.	Job Coverage On-Shift Position:																		
5.	Offsite Radiological Assessment On-Shift Position: HP #1		X	X	X	X	X	X	X	X	X	X	X						
6.	Other Site-Specific HP – Describe: On-Shift Position: HP																		
7.	Chemistry function/task #1 – Describe: Sample and analyze RCS On-Shift Position: Chem #1	X	X	X	X	X	X	X	X	X	X	X	X						
8.	Chemistry function/task #2 – Describe: On-Shift Position: Chem #1																		

Notes: Chemistry self monitors during sampling. No HP support required.

Chemistry sampling of RCS is from PASS due to isolation of normal sample point.

HP #2 relocates Sample Van outside protected area and prepares for monitoring/sampling. Note that HP#2 may be asked to provide radiological monitoring /survey by Shift Manager depending upon actual emergency conditions. This is acceptable since On-site (out-of-plant) HP Tech is not required until 60 minutes IAW Emergency Plan Table 6.1.

CH-ON-007, Chemistry Sampling Team

EP-PS-108, HP Tech 1 (OSCAR)

EP-PS-130, HP II Dose Calculator

On-Shift Staffing Analysis**TABLE 5 – Emergency Plan Implementation****Analysis # 2**

Line	Function/Task	On-Shift Position	Task Analysis Controlling Method
1.	Declare the Emergency Classification Level (ECL)	Shift Manager	EP/Ops Training and EP Drill Program
2.	Approve Offsite Protective Action Recommendations	N/A	N/A
3.	Approve content of State/local notifications	Shift Manager	EP/Ops Training and EP Drill Program
4.	Approve extension to allowable dose limits	N/A	N/A
5.	Notification and direction to on-shift staff (e.g., to assemble, evacuate, etc.)	PCO #2	EP/Ops Training and EP Drill Program
6.	ERO notification	SRO #1	EP/Ops Training and EP Drill Program
7.	Abbreviated NRC notification for DBT event	N/A	N/A
8.	Complete State/local notification form	Shift Manager	EP/Ops Training and EP Drill Program
9.	Perform State/local notifications	PCO #2	EP Training and EP Drill Program
10.	Complete NRC event notification form	SRO #1	EP/Ops Training and EP Drill Program
11.	Activate ERDS	SRO #1	EP/Ops Training and EP Drill Program
12.	Offsite radiological assessment	N/A	N/A
13.	Perform NRC notifications	SRO #1	EP/Ops Training and EP Drill Program
14.	Perform other site-specific event notifications (e.g., INPO, ANI, etc.)	N/A	N/A
15.	Personnel accountability	N/A	N/A

Notes: Unusual Event EAL MU7 → Alert EAL RA2 or FA1
EP-PS-100 Emergency Director, Control Room

On-Shift Staffing Analysis

Event Timelines and Assumptions

Event #6 MSL Break outside containment isolation

Initial Conditions:

Time: Tuesday @ 0430

Unit 2 100% Power, NOP, NOT, NOL

Sequence of Events:

0430 Double-ended guillotine MSLB occurs outside secondary containment on A MS Line

Break is downstream of the MSL Isolation Valves

Rx Scram occurs

MSIVs closed in 5.5 seconds

0432 SRVs open on high vessel pressure

SRVs Cycle to maintain pressure at \approx 1200 psig

0435:30 Rx water level above core begins to drop slowly

Pressure \approx 1200 psig

0505 RxV Level at -161" – ADS initiated

0508 Low pressure ECCS systems initiated

On-Shift Staffing Analysis**Appendix B****Analysis #3: DBA/ISG Event #6 – Steam System Piping Break (MSLB)****ECL: Alert → Site Area Emergency****TABLE 1 – On-shift Positions**

Line	On-shift Position	Emergency Plan Reference	Augmentation Elapsed Time (min)	Role in Table#/Line#	Unanalyzed Task?	TMS Required?
1.	Shift Manager	SSES E Plan Table 6.1	N/A	T2/L1 T5/L1 T5/L3 T5/L8	NO	NO
2.	Unit Supervisor (SRO #1) ¹	SSES E Plan Table 6.1	N/A	T5/L6 T5/L9 T5/L10 T5/L11 T5/L13	NO	NO
3.	Unit Supervisor (SRO #2) ¹	SSES E Plan Table 6.1	N/A	T2/L2	NO	NO
4.	Shift Technical Advisor (STA)	SSES E Plan Table 6.1	N/A	T2/L3	NO	NO
5.	Plant Control Operator (PCO #2) ²	SSES E Plan Table 6.1	N/A	T2/L4	NO	NO
6.	Plant Control Operator (PCO #3)	SSES E Plan Table 6.1	N/A	T2/L5	NO	NO
7.	Plant Control Operator (PCO #4) ²	SSES E Plan Table 6.1	N/A	T2/L6	NO	NO
8.	Nuclear Plant Operator (NPO #2)	SSES E Plan Table 6.1	N/A	T2/L7	NO	NO
9.	Nuclear Plant Operator (NPO #3)	SSES E Plan Table 6.1	N/A	T2/L8	NO	NO
10.	Nuclear Plant Operator (NPO #4)	SSES E Plan Table 6.1	N/A	T2/L9	NO	NO
11.	HP Technician (HP #1)	SSES E Plan Table 6.1	60	T4/L5	NO	NO
12.	HP Technician (HP #2)	SSES E Plan Table 6.1	60	T4/L2	NO	NO
13.	Security Officer #1	SSES E Plan Table 6.1	N/A	T2/L10	NO	NO
14.	Security Officer #2	SSES E Plan Table 6.1	N/A	T5/L15	NO	NO

Notes: ¹ Unaffected Unit Supervisor functions as the NRC Communicator² Unaffected Unit Plant Control Operator functions as E Plan Communicator

On-Shift Staffing Analysis**TABLE 2 - Plant Operations & Safe Shutdown**Analysis # 3

Two Units - One Control Room (Shared)
Minimum Operations Crew Necessary to Implement
ONs and EOPs, or SAMGs if applicable

Applicable to unit 2

Line	Generic Title/Role	On-Shift Position	Task Performance Validation
1.	Shift Manager	Shift Manager	Operator Training
2.	Shift Supervisor	Unit Supervisor (SRO #2)	Operator Training
3.	Shift Technical Advisor	Shift Technical Advisor (STA)	Operator Training
4.	Reactor Operator #2	Plant Control Operator (PCO #2)	Operator Training
5.	Reactor Operator #3	Plant Control Operator (PCO #3)	Operator Training
6.	Reactor Operator #4	Plant Control Operator (PCO #4)	Operator Training
7.	Auxiliary Operator #2	Nuclear Plant Operator (NPO #2)	Operator Training
8.	Auxiliary Operator #3	Nuclear Plant Operator (NPO #3)	Operator Training
9.	Auxiliary Operator #4	Nuclear Plant Operator (NPO #4)	Operator Training

Notes: See Table 2A for ON/EOP actions

Other (non-Operations) Personnel Necessary to Implement
 ONs and EOPs, or SAMGs if applicable

Line	Generic Title/Role	On-Shift Position	Task Performance Validation
10.	Security Officer	Security Officer #1	Security Training

Notes: Validate steam release from RX building using cameras

On-Shift Staffing Analysis

Analysis #3, Table 2A – ON/EOP Actions

Steam System Piping Break Outside Containment – MSLB (Unit #2)

Procedure Step/Actions			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
ON-200-102	Place Mode Switch in S/D	PCO 3	X											
EO-200-102, 103 and 104 GO-200-004	RPV Control	SRO 2							X					
Step RC2	Verify Control Rods In	PCO 3	X											
RC/L-1	Isolations ECCS Initiations DGs Start	PCO 4	X											
RC/L-4	Control Rx Water Level with HPIC RCIC	PCO 4	X											
RC/P-6	Maintain Pressure with SRVs	PCO 4							X					
RC/P-7	Lower pressure using SRVs	PCO 4		X										
RC/L-4	Use Condensate injection and restore RPV water level	PCO3		X										
EO-200-102 RC/L-5 RC/L-11 RC/L-10	Attempt to feed using table 5 subsystems	PCO 3 PCO 4			X									
	Line up Low pressure ECCS Systems	PCO 4			X									
EO-200-103 SP/T-2	Place RHR in supp pool cooling	PCO 2		X										
	Restore supp pool cooling	PCO 4								X				

On-Shift Staffing Analysis

Steam System Piping Break Outside Containment – MSLB (Unit #2)

Procedure Step/Actions			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
EO-200-112	Minus 161 enter EO-200-112	SRO 2							X					
	Prevent uncontrolled condensate ejection	PCO 3							X					
	Verify supp pool level	PCO 4							X					
	Open all ADS valves	PCO 4							X					
	Recover level with low pressure ECCS	PCO 3 PCO 4								X				
ON-200-101	Perform Scram Actions until transition to SD	PCO 3 PCO 4	X											
ON-159-002	Verify Isolations	PCO 3	X											
GO-200-004	Performing SD actions	NPO 2 NPO 4 PCO 3 PCO 4							X					
EO-200-104	Monitoring Rx Bldg and Turbine Bldg RAD levels and Temp	SRO 2 PCO 3	X											
	Start ESW and All coolers with cooling sources	PCO 3				X								
	Announce Evac of U2 Rx Bldg	PCO 2	X											
EO-200-105	Notify HP to Perform Offsite Dose Calcs	SM		X										
	Perform post start checks on DG	NPO 3						X						

On-Shift Staffing Analysis

TABLE 3 – Firefighting

Analysis # 3

Line	Performed By	Task Analysis Controlling Method
1.	N/A	N/A
2.	N/A	N/A
3.	N/A	N/A
4.	N/A	N/A
5.	N/A	N/A

Notes: No Fire Brigade response required for this event.

On-Shift Staffing Analysis**TABLE 4 – Radiation Protection & Chemistry****Analysis # 3**

Line	Position Performing Function/Task	Performance Time Period After Emergency Declaration (minutes)																	
		0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60	60-65	65-70	70-75	75-80	80-85	85-90
1.	In-Plant Survey On-Shift Position: HP																		
2.	Out of Plant Survey Relocation Field Monitoring Team Sample Van outside protected area On-Shift Position: HP #2	X	X	X	X	X	X	X	X	X	X	X	X						
3.	Personnel Monitoring On-Shift Position:																		
4.	Job Coverage On-Shift Position:																		
5.	Offsite Radiological Assessment On-Shift Position: HP #1	X	X	X	X	X	X	X	X	X	X	X	X						
6.	Other Site-Specific HP – Describe: On-Shift Position:																		
7.	Chemistry function/task #1 – Describe: Support Field Monitoring Team On-Shift Position: Chem #1																		
8.	Chemistry function/task #2 – Describe: On-Shift Position: Chem #1																		

Notes: Chemistry post trip sampling after ERO augmentation

EP-PS-108, HP Tech 1 (OSCAR)

EP-PS-130, HP II Dose Calculator

Note that HP#2 may be asked to provide radiological monitoring /survey by Shift Manager depending upon actual emergency conditions.

This is acceptable since On-site (out-of-plant) HP Tech is not required until 60 minutes IAW Emergency Plan Table 6.1.

On-Shift Staffing Analysis**TABLE 5 – Emergency Plan Implementation****Analysis # 3**

Line	Function/Task	On-Shift Position	Task Analysis Controlling Method
1.	Declare the Emergency Classification Level (ECL)	Shift Manager	EP/Ops Training and EP Drill Program
2.	Approve Offsite Protective Action Recommendations	N/A	N/A
3.	Approve content of State/local notifications	Shift Manager	EP/Ops Training and EP Drill Program
4.	Approve extension to allowable dose limits	N/A	N/A
5.	Notification and direction to on-shift staff (e.g., to assemble, evacuate, etc.)	PCO #2	EP/Ops Training and EP Drill Program
6.	ERO notification	SRO #1	EP/Ops Training and EP Drill Program
7.	Abbreviated NRC notification for DBT event	N/A	N/A
8.	Complete State/local notification form	Shift Manager	EP/Ops Training and EP Drill Program
9.	Perform State/local notifications	SRO #1	EP Training and EP Drill Program
10.	Complete NRC event notification form	SRO #1	EP/Ops Training and EP Drill Program
11.	Activate ERDS	SRO #1	EP/Ops Training and EP Drill Program
12.	Offsite radiological assessment	N/A	N/A
13.	Perform NRC notifications	SRO #1	EP/Ops Training and EP Drill Program
14.	Perform other site-specific event notifications (e.g., INPO, ANI, etc.)	N/A	N/A
15.	Personnel accountability	Security Officer #2	EP/Security Training and EP Drill Program

Notes: Alert EAL FA1 → Site Area Emergency EAL FS1
EP-PS-100 Emergency Director, Control Room

On-Shift Staffing Analysis

Event Timelines and Assumptions

Event #7 Large break LOCA with release exceeding PAGs and resulting in PARs

Initial Conditions:

Time: Tuesday @ 0430

Unit 2 100% Power, NOP & NOT

Sequence of Events:

0430 Large Break LOCA occurs – Recirc Line Break
 Loss of Normal AC power occurs coincident with break

0435 Reactor Level -205 inches. Drywell pressure 18.5psig

0500 Dose Projection indicates 1.1 R/hr at Emergency Plan Boundary (EPB)

On-Shift Staffing Analysis

Appendix B

Analysis #4: DBA/ISG Event #7 - Large Break LOCA with release and PARs ECL: Site Area Emergency → General Emergency

TABLE 1 – On-shift Positions

Line	On-shift Position	Emergency Plan Reference	Augmentation Elapsed Time (min)	Role in Table#/Line#	Unanalyzed Task?	TMS Required?
1.	Shift Manager	SSES E Plan Table 6.1	N/A	T2/L1 T5/L1 T5/L2 T5/L3 T5/L4 T5/L8	NO	NO
2.	Unit Supervisor (SRO #1) ¹	SSES E Plan Table 6.1	N/A	T5/L5 T5/L6 T5/L9 T5/L10 T5/L11 T5/L13	NO	NO
3.	Unit Supervisor (SRO #2) ¹	SSES E Plan Table 6.1	N/A	T2/L2	NO	NO
4.	Shift Technical Advisor (STA)	SSES E Plan Table 6.1	N/A	T2/L3	NO	NO
5.	Plant Control Operator (PCO #2) ²	SSES E Plan Table 6.1	N/A	T2/L4 T5/L9 ³	NO	NO
6.	Plant Control Operator (PCO #3)	SSES E Plan Table 6.1	N/A	T2/L5	NO	NO
7.	Plant Control Operator (PCO #4) ²	SSES E Plan Table 6.1	N/A	T2/L6	NO	NO
8.	Nuclear Plant Operator (NPO #4)	SSES E Plan Table 6.1	N/A	T2/L7	NO	NO
9.	HP Technician (HP #1)	SSES E Plan Table 6.1	60	T4/L6	NO	NO
10.	HP Technician (HP #2)	SSES E Plan Table 6.1	60	T4/L2 T4/L3	NO	NO
11.	CAS Operator	SSES E Plan Table 6.1	N/A	T5/L15	NO	NO

Notes: ¹ Unaffected Unit Supervisor functions as the NRC Communicator
² Unaffected Unit Plant Control Operator functions as E Plan Communicator
³ PCO is available to make offsite communications at GE (See Table 2A)

On-Shift Staffing Analysis**TABLE 2 - Plant Operations & Safe Shutdown**Analysis # 4

Two Units - One Control Room (Shared)
Minimum Operations Crew Necessary to Implement
ONs and EOPs, or SAMGs if applicable

Applicable to unit 2

Line	Generic Title/Role	On-Shift Position	Task Performance Validation
1.	Shift Manager	Shift Manager	Operator Training
2.	Shift Supervisor	Unit Supervisor (SRO #2)	Operator Training
3.	Shift Technical Advisor	Shift Technical Advisor (STA)	Operator Training
4.	Reactor Operator #2	Plant Control Operator (PCO #2)	Operator Training
5.	Reactor Operator #3	Plant Control Operator (PCO #3)	Operator Training
6.	Reactor Operator #4	Plant Control Operator (PCO #4)	Operator Training
7.	Auxiliary Operator #4	Nuclear Plant Operator (NPO #4)	Operator Training

Notes: See Table 2A for ON/EOP actions

On-Shift Staffing Analysis
Analysis #4, Table 2A – ON/EOP Actions

Loss of Coolant Accident Inside Containment (Unit #2)

Procedure Step/Actions			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
ON-200-102	Place Mode Switch in S/D	PCO 3	X											
EO-200-102, 103	RPV Control	SRO 2	X											
Step RC2	Verify Control Rods In	PCO 3	X											
RC/L-1	Isolations ECCS Initiations DGs Start	PCO 4	X											
EO-200-112	Minus 161 enter EO-200-112	SRO 2	X											
	Prevent uncontrolled condensate injection	PCO 3	X											
	Verify supp pool level	PCO 4	X											
	Verify that all ADS valves are open	PCO 4	X											
	Recover level with low pressure ECCS	PCO 3 PCO 4	X											
	Start standby Liquid control and maximize CRD	PCO 3	X											
EO-200-103	Commence Dry Well Sprays	PCO 3		X										
	Commence Supp Pool cooling	PCO 2		X										
	Start H2 Analyzers	PCO 3					X							
EO-200-102	Line up RHR service water to RHR heat exchangers	PCO 2 PCO 3		X										
	DG post start checks	NPO 4	X											

On-Shift Staffing Analysis

TABLE 3 – Firefighting

Analysis # 4

Line	Performed By	Task Analysis Controlling Method
1.	N/A	N/A
2.	N/A	N/A
3.	N/A	N/A
4.	N/A	N/A
5.	N/A	N/A

Notes: No Fire Brigade response required for this event.

On-Shift Staffing Analysis

TABLE 4 – Radiation Protection & Chemistry

Analysis # 4

Line	Position Performing Function/Task	Performance Time Period After Emergency Declaration (minutes)																	
		0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60	60-65	65-70	70-75	75-80	80-85	85-90
1.	In-Plant Survey On-Shift Position: HP																		
2.	Out of Plant Survey Move Field Monitoring Team Van outside PA On-Shift Position: HP #2	X	X	X	X	X	X												
3.	Out of Plant Survey Perform surveys (Near Site) On-Shift Position: HP #2							X	X	X	X								
4.	Personnel Monitoring On-Shift Position:																		
5.	Job Coverage On-Shift Position:																		
6.	Offsite Radiological Assessment On-Shift Position: HP #1	X	X	X	X	X	X	X	X	X	X								
7.	Other Site-Specific HP – Describe: On-Shift Position:																		
8.	Chemistry function/task #1 – Describe: Support Field Monitoring Team On-Shift Position: Chem #1																		
9.	Chemistry function/task #2 – Describe: On-Shift Position: Chem #1																		

Notes: EP-PS-108, HP Tech I (OSCAR)

EP-PS-130, HP II Dose Calculator

Note that HP#2 may be asked to provide radiological monitoring /survey by Shift Manager depending upon actual emergency conditions.
This is acceptable since On-site (out-of-plant) HP Tech is not required until 60 minutes IAW Emergency Plan Table 6.1.

On-Shift Staffing Analysis**TABLE 5 – Emergency Plan Implementation****Analysis # 4**

Line	Function/Task	On-Shift Position	Task Analysis Controlling Method
1.	Declare the Emergency Classification Level (ECL)	Shift Manager	EP/Ops Training and EP Drill Program
2.	Approve Offsite Protective Action Recommendations	Shift Manager	EP/Ops Training and EP Drill Program
3.	Approve content of State/local notifications	Shift Manager	EP/Ops Training and EP Drill Program
4.	Approve extension to allowable dose limits	Shift Manager	EP/Ops Training and EP Drill Program
5.	Notification and direction to on-shift staff (e.g., to assemble, evacuate, etc.)	SRO #1	EP/Ops Training and EP Drill Program
6.	ERO notification	SRO #1	EP/Ops Training and EP Drill Program
7.	Abbreviated NRC notification for DBT event	N/A	N/A
8.	Complete State/local notification form	Shift Manager	EP/Ops Training and EP Drill Program
9.	Perform State/local notifications	SRO #1 @ SAE PCO #2 @ GE	EP Training and EP Drill Program
10.	Complete NRC event notification form	SRO #1	EP/Ops Training and EP Drill Program
11.	Activate ERDS	SRO #1	EP/Ops Training and EP Drill Program
12.	Offsite radiological assessment	N/A	N/A
13.	Perform NRC notifications	SRO #1	EP/Ops Training and EP Drill Program
14.	Perform other site-specific event notifications (e.g., INPO, ANI, etc.)	N/A ¹	N/A
15.	Personnel accountability	CAS Operator	EP/Security Training and EP Drill Program

Notes: Site Area Emergency EAL FS1 → General Emergency EAL RG1
 EP-PS-100 Emergency Director, Control Room
¹ Shift Manager notifies Senior State Official of PARs. Completion of notification within approximately 1 minute.

On-Shift Staffing Analysis

Event Timelines and Assumptions

Event #10 ATWS

Initial Conditions:

Time: Tuesday @ 0430

Unit 1 100% Power, NOP & NOT

Sequence of Events:

0430 MSIVs close. Reactor does not trip.

Supplemental and/or manual trip actions are successful.

On-Shift Staffing Analysis**Appendix B****Analysis #5: DBA/ISG Event #10 - ATWS****ECL: Alert****TABLE 1 – On-shift Positions**

Line	On-shift Position	Emergency Plan Reference	Augmentation Elapsed Time (min)	Role in Table#/Line#	Unanalyzed Task?	TMS Required?
1.	Shift Manager	SSES E Plan Table 6.1	N/A	T2/L1 T5/L1 T5/L3 T5/L8	NO	NO
2.	Unit Supervisor (SRO #1) ¹	SSES E Plan Table 6.1	N/A	T2/L2 T5/L5	NO	NO
3.	Unit Supervisor (SRO #2) ¹	SSES E Plan Table 6.1	N/A	T5/L6 T5/L10 T5/L11 T5/L13	NO	NO
4.	Shift Technical Advisor (STA)	SSES E Plan Table 6.1	N/A	T2/L3	NO	NO
5.	Plant Control Operator (PCO #1)	SSES E Plan Table 6.1	N/A	T2/L4	NO	NO
6.	Plant Control Operator (PCO #2) ²	SSES E Plan Table 6.1	N/A	T2/L5	NO	NO
7.	Plant Control Operator (PCO #4) ²	SSES E Plan Table 6.1	N/A	T5/L9	NO	NO
8.	Nuclear Plant Operator (NPO #1)	SSES E Plan Table 6.1	N/A	T2/L6	NO	NO
9.	Nuclear Plant Operator (NPO #3)	SSES E Plan Table 6.1	N/A	T2/L7	NO	NO

Notes: ¹ Unaffected Unit Supervisor functions as the NRC Communicator² Unaffected Unit Plant Control Operator functions as E Plan Communicator

On-Shift Staffing Analysis**TABLE 2 - Plant Operations & Safe Shutdown**Analysis # 5

Two Units - One Control Room (Shared)
Minimum Operations Crew Necessary to Implement
ONs and EOPs, or SAMGs if applicable

Applicable to unit 1

Line	Generic Title/Role	On-Shift Position	Task Performance Validation
1.	Shift Manager	Shift Manager	Operator Training
2.	Shift Supervisor	Unit Supervisor (SRO #1)	Operator Training
3.	Shift Technical Advisor	Shift Technical Advisor (STA)	Operator Training
4.	Reactor Operator #1	Plant Control Operator (PCO #1)	Operator Training
5.	Reactor Operator #2	Plant Control Operator (PCO #2)	Operator Training
6.	Auxiliary Operator #1	Nuclear Plant Operator (NPO #1)	Operator Training
7.	Auxiliary Operator #3	Nuclear Plant Operator (NPO #3)	Operator Training

Notes: See Table 2A for ON/EOP actions

On-Shift Staffing Analysis
Analysis #5, Table 2A – ON/EOP Actions

ATWS

Procedure Step/Actions			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
EO-100-113	Place Mode Switch in S/D	PCO1	X											
	Verify all rods IN	PCO1	X											
	Transition to EO-100-102	SRO1	X											
EO-100-102	RPV Control	SRO1	X											
Step RC2	Verify Control Rods In	PCO 1	X											
RC/L-1	Isolations ECCS Initiations DGs Start	PCO 2	X											
RC/L-8	Reset Main Gen Lockouts	PCO 2	X											
RC/L-4	Control Rx Water Level with HPIC RCIC	PCO 2	X											
RC/P-6	Maintain Pressure with SRVs	PCO 2	X											
RC/P-6	Maintain Pressure with HPIC	PCO 2					X							
RC/P-7	Cool down using HPCI	PCO 2							X					
RC/L-4	Restore Condensate Injection and control RPV water level	PCO1							X					
EO-100-103	Place RHR in supp pool cooling	PCO 1			X									

On-Shift Staffing Analysis

ATWS

Procedure Step/Actions			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
ON-100-101	Perform Scram Actions until transition to SD	PCO 1 PCO 2												
ON-159-002	Recover from Isolations	PCO 1 NPO1												
GO-100-004	Performing SD actions	NPO 1 NPO3												

On-Shift Staffing Analysis

TABLE 3 – Firefighting

Analysis # 5

Line	Performed By	Task Analysis Controlling Method
1.	N/A	N/A
2.	N/A	N/A
3.	N/A	N/A
4.	N/A	N/A
5.	N/A	N/A

Notes: No Fire Brigade response required for this event.

On-Shift Staffing Analysis

TABLE 4 – Radiation Protection & Chemistry

Analysis # 5

Line	Position Performing Function/Task	Performance Time Period After Emergency Declaration (minutes)																	
		0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60	60-65	65-70	70-75	75-80	80-85	85-90
1.	In-Plant Survey On-Shift Position: HP																		
2.	Out of Plant Survey On-Shift Position: HP #2																		
3.	Personnel Monitoring On-Shift Position:																		
4.	Job Coverage On-Shift Position:																		
5.	Offsite Radiological Assessment On-Shift Position: HP #1																		
6.	Other Site-Specific HP – Describe: On-Shift Position:																		
7.	Chemistry function/task #1 – Describe: Support Field Monitoring Team On-Shift Position: Chem #1																		
8.	Chemistry function/task #2 – Describe: On-Shift Position: Chem #1																		

Notes: HP & Chemistry report to Control Room for direction from Shift Manager
Chemistry Post Trip Sampling after ERO augmentation (required within 12 hours of shutdown)

On-Shift Staffing Analysis**TABLE 5 – Emergency Plan Implementation****Analysis # 5**

Line	Function/Task	On-Shift Position	Task Analysis Controlling Method
1.	Declare the Emergency Classification Level (ECL)	Shift Manager	EP/Ops Training and EP Drill Program
2.	Approve Offsite Protective Action Recommendations	N/A	N/A
3.	Approve content of State/local notifications	Shift Manager	EP/Ops Training and EP Drill Program
4.	Approve extension to allowable dose limits	N/A	N/A
5.	Notification and direction to on-shift staff (e.g., to assemble, evacuate, etc.)	SRO #1	EP/Ops Training and EP Drill Program
6.	ERO notification	SRO #2	EP/Ops Training and EP Drill Program
7.	Abbreviated NRC notification for DBT event	N/A	N/A
8.	Complete State/local notification form	Shift Manager	EP/Ops Training and EP Drill Program
9.	Perform State/local notifications	PCO #4	EP Training and EP Drill Program
10.	Complete NRC event notification form	SRO #2	EP/Ops Training and EP Drill Program
11.	Activate ERDS	SRO #2	EP/Ops Training and EP Drill Program
12.	Offsite radiological assessment	N/A	N/A
13.	Perform NRC notifications	SRO #2	EP/Ops Training and EP Drill Program
14.	Perform other site-specific event notifications (e.g., INPO, ANI, etc.)	N/A	N/A
15.	Personnel accountability	N/A	N/A

Notes: Alert EAL MA
EP-PS-100 Emergency Director, Control Room

On-Shift Staffing Analysis

Event Timelines and Assumptions

Event #11 Response actions for an "aircraft probable threat" in accordance with 10CFR50.54(hh)(1)

Initial Conditions:

Time: Monday @ 2100

Unit 1&2 100% Power, NOP & NOT

Sequence of Events:

2100 Aircraft probable threat call received from NRC Headquarters.

Call is verified.

Aircraft is \approx 25 minutes from site

On-Shift Staffing Analysis

Appendix B

Analysis #6: DBA/ISG Event #11 - Aircraft Probable Threat

ECL: Alert

TABLE 1 – On-shift Positions

Line	On-shift Position	Emergency Plan Reference	Augmentation Elapsed Time (min)	Role in Table#/Line#	Unanalyzed Task?	TMS Required?
1.	Shift Manager	SSES E Plan Table 6.1	N/A	T2/L1 T5/L1 T5/L3 T5/L8	NO	NO
2.	Unit Supervisor (SRO #1) ¹	SSES E Plan Table 6.1	N/A	T2/L2	NO	NO
3.	Unit Supervisor (SRO #2) ¹	SSES E Plan Table 6.1	N/A	T5/L6 T5/L10 T5/L11 T5/L13	NO	NO
4.	Shift Technical Advisor (STA)	SSES E Plan Table 6.1	N/A	T2/L3	NO	NO
5.	Plant Control Operator (PCO #1)	SSES E Plan Table 6.1	N/A	T2/L4	NO	NO
6.	Plant Control Operator (PCO #2) ²	SSES E Plan Table 6.1	N/A	T2/L5 T5/L5	NO	NO
7.	Plant Control Operator (PCO #3)	SSES E Plan Table 6.1	N/A	T2/L6	NO	NO
8.	Plant Control Operator (PCO #4) ²	SSES E Plan Table 6.1	N/A	T2/L7 T5/L9 ³	NO	NO
9.	Nuclear Plant Operator (NPO #1)	SSES E Plan Table 6.1	N/A	T2/L8	NO	NO
10.	Security Officer #1	SSES E Plan Table 6.1	N/A	T2/L9	NO	NO
11.	Security Officer #2	SSES E Plan Table 6.1	N/A	T5/L14	NO	NO

Notes: ¹ Unaffected Unit Supervisor functions as the NRC Communicator² Unaffected Unit Plant Control Operator functions as E Plan Communicator³ Refer to Table 2A – PCO available to perform Emergency Plan actions after ON/EOP actions.

On-Shift Staffing Analysis**TABLE 2 - Plant Operations & Safe Shutdown**Analysis # 6

Two Units - One Control Room (Shared)
Minimum Operations Crew Necessary to Implement
ONs and EOPs, or SAMGs if applicable

Applicable to unit 1 & 2

Line	Generic Title/Role	On-Shift Position	Task Performance Validation
1.	Shift Manager	Shift Manager	Operator Training
2.	Shift Supervisor	Unit Supervisor (SRO #1)	Operator Training
3.	Shift Technical Advisor	Shift Technical Advisor (STA)	Operator Training
4.	Reactor Operator #1	Plant Control Operator (PCO #1)	Operator Training
5.	Reactor Operator #2	Plant Control Operator (PCO #2)	Operator Training
6.	Reactor Operator #3	Plant Control Operator (PCO #3)	Operator Training
7.	Reactor Operator #4	Plant Control Operator (PCO #4)	Operator Training
8.	Auxiliary Operator #1	Nuclear Plant Operator (NPO #1)	Operator Training

Notes: See Table 2A for ON/EOP actions

Other (non-Operations) Personnel Necessary to Implement
 ONs and EOPs, or SAMGs if applicable

Line	Generic Title/Role	On-Shift Position	Task Performance Validation
9.	Security Officer	Security Officer #1	Security Training

Notes: Extinguish interior (PA) plant lighting and preps to extinguish exterior plant lighting

On-Shift Staffing Analysis
Analysis #6, Table 2A – ON/EOP Actions

Aircraft Threat

Procedure Step/Actions			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
ON-000-010 Step 3.9	PA Announcement	PCO 2	X											
ON-000-010	Direct ON-000-010 actions	SRO 1	X											
ON-000-010 Attach D	Establish Communications with NRC	STA	X											
	Isolate RWCU (both Units)	PCO 1 PCO 3	X											
	Perform Scram Imminent Actions	PCO 1-4	X											
	Maximize CRD	PCO 2 PCO 4	X											
	Place CREOASS in Recirc	PCO 2	X											
	Eval E Plan Entry	SM and STA		X										
	Extinguish Interior (PA) Lights and Prep to Extinguish Exterior Lights	SAS	X											
ON-000-010 Attach G	Start ESW and DG	PCO 2	X											
	Start SCC DG	NPO1		X										
	Supp Pool Cooling in Service	PCO 2 PCO 4		X										

On-Shift Staffing Analysis

TABLE 3 – Firefighting

Analysis # 6

Line	Performed By	Task Analysis Controlling Method
1.	N/A	N/A
2.	N/A	N/A
3.	N/A	N/A
4.	N/A	N/A
5.	N/A	N/A

Notes: No Fire Brigade response required for this event. Personnel evacuate target buildings.
Initiate "Duck and Cover"

On-Shift Staffing Analysis

TABLE 4 – Radiation Protection & Chemistry

Analysis # 6

Line	Position Performing Function/Task	Performance Time Period After Emergency Declaration (minutes)																	
		0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60	60-65	65-70	70-75	75-80	80-85	85-90
1.	In-Plant Survey On-Shift Position: HP																		
2.	Out of Plant Survey On-Shift Position: HP #2																		
3.	Personnel Monitoring On-Shift Position:																		
4.	Job Coverage On-Shift Position:																		
5.	Offsite Radiological Assessment On-Shift Position: HP #1																		
6.	Other Site-Specific HP – Describe: On-Shift Position:																		
7.	Chemistry function/task #1 – Describe: Support Field Monitoring Team On-Shift Position: Chem #1																		
8.	Chemistry function/task #2 – Describe: On-Shift Position: Chem #1																		

Notes: HP/Chemistry are in "Duck and Cover" Mode.

On-Shift Staffing Analysis**TABLE 5 – Emergency Plan Implementation****Analysis # 6**

Line	Function/Task	On-Shift Position	Task Analysis Controlling Method
1.	Declare the Emergency Classification Level (ECL)	Shift Manager	EP/Ops Training and EP Drill Program
2.	Approve Offsite Protective Action Recommendations	N/A	N/A
3.	Approve content of State/local notifications	Shift Manager	EP/Ops Training and EP Drill Program
4.	Approve extension to allowable dose limits	N/A	N/A
5.	Notification and direction to on-shift staff (e.g., to assemble, evacuate, etc.)	PCO #2	EP/Ops Training and EP Drill Program
6.	ERO notification	SRO #2	EP/Ops Training and EP Drill Program
7.	Abbreviated NRC notification for DBT event	N/A	N/A
8.	Complete State/local notification form	Shift Manager	EP/Ops Training and EP Drill Program
9.	Perform State/local notifications	PCO #4	EP Training and EP Drill Program
10.	Complete NRC event notification form	SRO #2	EP/Ops Training and EP Drill Program
11.	Activate ERDS	SRO #2	EP/Ops Training and EP Drill Program
12.	Offsite radiological assessment	N/A	N/A
13.	Perform NRC notifications	SRO #2	EP/Ops Training and EP Drill Program
14.	Perform other site-specific event notifications (e.g., INPO, ANI, etc.)	Security Officer #2	EP/Security Training and EP Drill Program
15.	Personnel accountability	N/A	N/A

Notes: Alert EAL OA2
EP-PS-100 Emergency Director, Control Room

On-Shift Staffing Analysis

Event Timelines and Assumptions

Event #12 Control room fire leading to evacuation and remote shutdown

Initial Conditions:

Time: Monday @ 0330

Unit 1&2 100% Power, NOP & NOT

Sequence of Events:

0330 Smoke, sparks and flames observed coming from back of control board

Fire Brigade activated

0332 Fire Operations attempt to extinguish flames without success – fire and smoke affects operation of both units 1&2

0340 Decision to evacuate Control Room 1&2

On-Shift Staffing Analysis**Appendix B****Analysis #7: DBA/ISG Event #12 - Control Room Fire w/Evacuation & Remote Shutdown****ECL: Alert****TABLE 1 – On-shift Positions**

Line	On-shift Position	Emergency Plan Reference	Augmentation Elapsed Time (min)	Role in Table#/Line#	Unanalyzed Task?	TMS Required?
1.	Shift Manager	SSES E Plan Table 6.1	N/A	T2/L1 T5/L1 T5/L3 T5/L8	NO	NO
2.	Unit Supervisor (SRO #1) ¹	SSES E Plan Table 6.1	N/A	T2/L2 T5/L5	NO	NO
3.	Unit Supervisor (SRO #2) ¹	SSES E Plan Table 6.1	N/A	T2/L3	NO	NO
4.	Shift Technical Advisor (STA)	SSES E Plan Table 6.1	N/A	T2/L4 T5/L6 T5/L9 T5/L10 T5/L13	NO	YES
5.	Field Unit Supervisor (FBL) ²	SSES E Plan Table 6.1	N/A	T3/L1	NO	NO
6.	Plant Control Operator (PCO #1)	SSES E Plan Table 6.1	N/A	T2/L5	NO	NO
7.	Plant Control Operator (PCO #2) ³	SSES E Plan Table 6.1	N/A	T2/L6	NO	NO
8.	Plant Control Operator (PCO #3)	SSES E Plan Table 6.1	N/A	T2/L7	NO	NO
9.	Plant Control Operator (PCO #4) ³	SSES E Plan Table 6.1	N/A	T2/L8	NO	NO
10.	Nuclear Plant Operator (NPO #1)	SSES E Plan Table 6.1	N/A	T2/L9	NO	NO
11.	Nuclear Plant Operator (NPO #2)	SSES E Plan Table 6.1	N/A	T2/L10	NO	NO
12.	Nuclear Plant Operator (NPO #3)	SSES E Plan Table 6.1	N/A	T2/L11	NO	NO

On-Shift Staffing Analysis

Line	On-shift Position	Emergency Plan Reference	Augmentation Elapsed Time (min)	Role in Table#/Line#	Unanalyzed Task?	TMS Required?
13.	Nuclear Plant Operator (NPO #4)	SSES E Plan Table 6.1	N/A	T2/L12	NO	NO
14.	Effluents Handyman #1 (FBM #1)	SSES E Plan Table 6.1	N/A	T3/L2	NO	NO
15.	Effluents Handyman #2 (FBM #2)	SSES E Plan Table 6.1	N/A	T3/L3	NO	NO
16.	Effluents Handyman #3 (FBM #3)	SSES E Plan Table 6.1	N/A	T3/L4	NO	NO
17.	Effluents Handyman #4 (FBM #4)	SSES E Plan Table 6.1	N/A	T3/L5	NO	NO

Notes: ¹ Unaffected Unit Supervisor functions as the NRC Communicator
² Functions as Fire Brigade Leader during fire related response events
³ Unaffected Unit Plant Control Operator functions as E Plan Communicator

On-Shift Staffing Analysis**TABLE 2 - Plant Operations & Safe Shutdown**Analysis # 7

Two Units - One Control Room (Shared)
Minimum Operations Crew Necessary to Implement
ONs and EOPs, or SAMGs if applicable

Applicable to unit 1 & 2

Line	Generic Title/Role	On-Shift Position	Task Performance Validation
1.	Shift Manager	Shift Manager	Operator Training
2.	Shift Supervisor	Unit Supervisor (SRO #1)	Operator Training
3.	Shift Supervisor	Unit Supervisor (SRO #2)	Operator Training
4.	Shift Technical Advisor	Shift Technical Advisor (STA)	Operator Training
5.	Reactor Operator #1	Plant Control Operator (PCO #1)	Operator Training
6.	Reactor Operator #2	Plant Control Operator (PCO #2)	Operator Training
7.	Reactor Operator #3	Plant Control Operator (PCO #3)	Operator Training
8.	Reactor Operator #4	Plant Control Operator (PCO #4)	Operator Training
9.	Auxiliary Operator #1	Nuclear Plant Operator (NPO #1)	Operator Training
10.	Auxiliary Operator #2	Nuclear Plant Operator (NPO #2)	Operator Training
11.	Auxiliary Operator #3	Nuclear Plant Operator (NPO #3)	Operator Training
12.	Auxiliary Operator #4	Nuclear Plant Operator (NPO #4)	Operator Training

Notes: See Table 2A for ON/EOP actions

On-Shift Staffing Analysis
Analysis #7, Table 2A – ON/EOP Actions

Control Room Fire with Evacuation

Procedure Step/Actions			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
ON-1(2)00-009 Step 3.2	Notify Security and PA announcement	SRO 1			x									
	Activate ERO or Alt ERO	STA			x									
	Insert Scram and verify Control Rods SRM and IRMs Inserted	PCO 1 PCO 3			x									
	Close MSIVs	PCO 2 PCO 4			x									
	Placing FW in startup level control	PCO 1 PCO 3			x									
	Isolate RWCU	PCO 1 PCO 3			x									
	Startup HPCI and RCIC	PCO 2 PCO 4			x									
	Obtain keys and take EOP boards currently in use	SRO 1 SRO 2			x									
ON-1(2)00-009 Step 3.3	Evac CR	All			x									
Step 4.3.1	Start Laptop	PCO 1 PCO 3					x							
Step 4.3.2	Transfer Switch Lineup	PCO 2 PCO 4					x							
4.3.3	Notify SM when transferred	SRO 1 SRO 2					x							
N/A	SM and STA report to OCC	SM / STA					x							
4.3.4	Isolate A – D ESS bus feeder breakers from CR	NPO 1 NPO 2							x					
4.3.5	Isolate RSR Service water flow thru appropriate RHR heat exchangers	NPO 3 NPO 4									x			

On-Shift Staffing Analysis

Control Room Fire with Evacuation

Procedure Step/Actions			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
4.3.6 – 4.3.7	Verify MSIV and MSL drains are closed	PCO 1 PCO 3												
	Monitor Plant Parameters	PCO 1 PCO 3												
4.5.1	Disable CR HMIS interfaces	NPO 1												
4.5.2	Verify Control Structure HVAC operating	NPO 2												
4.6	Control Rx Press from Remote SDP	PCO 1 PCO 3												
	Verify Instrument gas in service	NPO 3 NPO 4												
	Verify all Turbines tripped	NPO 3 NPO 4												
EO-1(2)00-102 OP-1(2)50-001 Step 2.15	Maintain Rx Water Level with RCIC	PCO 1 PCO 3												
EO-1(2)00-102 ON-1(2)00-101	Take Scram Actions	PCO 1-4												

On-Shift Staffing Analysis

TABLE 3 – Firefighting

Analysis # 7

Line	Performed By	Task Analysis Controlling Method
1.	Field Unit Supervisor (FBL)	Fire Brigade Training
2.	Effluents Handyman #1 (FBM #1)	Fire Brigade Training
3.	Effluents Handyman #2 (FBM #2)	Fire Brigade Training
4.	Effluents Handyman #3 (FBM #3)	Fire Brigade Training
5.	Effluents Handyman #4 (FBM #4)	Fire Brigade Training

Notes:

On-Shift Staffing Analysis

TABLE 4 – Radiation Protection & Chemistry

Analysis # 7

Line	Position Performing Function/Task	Performance Time Period After Emergency Declaration (minutes)																	
		0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60	60-65	65-70	70-75	75-80	80-85	85-90
1.	In-Plant Survey On-Shift Position: HP																		
2.	Out of Plant Survey On-Shift Position: HP #2																		
3.	Personnel Monitoring On-Shift Position:																		
4.	Job Coverage On-Shift Position:																		
5.	Offsite Radiological Assessment On-Shift Position: HP #1																		
6.	Other Site-Specific HP – Describe: On-Shift Position:																		
7.	Chemistry function/task #1 – Describe: Support Field Monitoring Team On-Shift Position: Chem #1																		
8.	Chemistry function/task #2 – Describe: On-Shift Position: Chem #1																		

Notes: HP Technicians report to OSC for this event and take direction from Shift Manager.
 Chemistry Technician reports to OSC for this event and takes direction from Shift Manager.
 Chemistry Post Trip Sampling after ERO augmentation (required within 12 hours of shutdown)

On-Shift Staffing Analysis**TABLE 5 – Emergency Plan Implementation****Analysis # 7**

Line	Function/Task	On-Shift Position	Task Analysis Controlling Method
1.	Declare the Emergency Classification Level (ECL)	Shift Manager	EP/Ops Training and EP Drill Program
2.	Approve Offsite Protective Action Recommendations	N/A	N/A
3.	Approve content of State/local notifications	Shift Manager	EP/Ops Training and EP Drill Program
4.	Approve extension to allowable dose limits	N/A	N/A
5.	Notification and direction to on-shift staff (e.g., to assemble, evacuate, etc.)	SRO #1	EP/Ops Training and EP Drill Program
6.	ERO notification	STA	EP/Ops Training and EP Drill Program
7.	Abbreviated NRC notification for DBT event	N/A	N/A
8.	Complete State/local notification form	Shift Manager	EP/Ops Training and EP Drill Program
9.	Perform State/local notifications	STA	EP Training and EP Drill Program
10.	Complete NRC event notification form	STA	EP/Ops Training and EP Drill Program
11.	Activate ERDS	Will occur in the EOF after augmentation*	EP Training and EP Drill Program
12.	Offsite radiological assessment	N/A	N/A
13.	Perform NRC notifications	STA	EP/Ops Training and EP Drill Program
14.	Perform other site-specific event notifications (e.g., INPO, ANI, etc.)	N/A	N/A
15.	Personnel accountability	N/A	N/A

Notes: Alert EAL OA4/OA6
 EP-PS-100 Emergency Director, Control Room
 * At the time of the Phase II On-shift Staffing Analysis, ERDS activation would occur in the EOF. As of DEC 2012, ERDS can be started from any nuclear Susquehanna Computer (such as those in the OSC where the SM and STA could evacuate to) IAW EP-PS-135, NRC Communicator. ERDS activation time is ~1 minute

On-Shift Staffing Analysis
Event Timelines and Assumptions

Event #13 Station Blackout

Initial Conditions:

Time: Monday @ 0330

Unit 1 100% Power, NOP & NOT

Unit 2 100% Power, NOP & NOT

Emergency Diesel Generator E was declared inoperable at 0300 and isolated for maintenance due to failure of the Woodward governor.

Sequence of Events:

0330 Total LOOP

Startup Transformers T10 and T20 are unavailable

Emergency Diesel Generator A fails to start

Emergency Diesel Generator B fails to start

Emergency Diesel Generator C fails to start

Emergency Diesel Generator D fails to start

On-Shift Staffing Analysis**Appendix B****Analysis #8: DBA/ISG Event #13 - Station Blackout
TABLE 1 – On-shift Positions****ECL: Site Area Emergency**

Line	On-shift Position	Emergency Plan Reference	Augmentation Elapsed Time (min)	Role in Table#/Line#	Unanalyzed Task?	TMS Required?
1.	Shift Manager	SSES E Plan Table 6.1	N/A	T2/L1 T5/L1 T5/L3 T5/L8	NO	NO
2.	Unit Supervisor (SRO #1) ¹	SSES E Plan Table 6.1	N/A	T2/L2	NO	NO
3.	Unit Supervisor (SRO #2) ¹	SSES E Plan Table 6.1	N/A	T2/L3	NO	NO
4.	Shift Technical Advisor (STA)	SSES E Plan Table 6.1	N/A	T2/L4 T5/L5 T5/L6 T5/L9 T5/L10 T5/L11 T5/L13	NO	YES
5.	Field Unit Supervisor (FBL) ²	SSES E Plan Table 6.1	N/A	T2/L5	NO	NO
6.	Plant Control Operator (PCO #1)	SSES E Plan Table 6.1	N/A	T2/L6	NO	NO
7.	Plant Control Operator (PCO #2) ³	SSES E Plan Table 6.1	N/A	T2/L7	NO	NO
8.	Plant Control Operator (PCO #3)	SSES E Plan Table 6.1	N/A	T2/L8	NO	NO
9.	Plant Control Operator (PCO #4) ³	SSES E Plan Table 6.1	N/A	T2/L9	NO	NO
10.	Nuclear Plant Operator (NPO #1)	SSES E Plan Table 6.1	N/A	T2/L10	NO	NO
11.	Nuclear Plant Operator (NPO #2)	SSES E Plan Table 6.1	N/A	T2/L11	NO	NO

On-Shift Staffing Analysis

Line	On-shift Position	Emergency Plan Reference	Augmentation Elapsed Time (min)	Role in Table#/Line#	Unanalyzed Task?	TMS Required?
12.	Nuclear Plant Operator (NPO #3)	SSES E Plan Table 6.1	N/A	T2/L12	NO	NO
13.	Nuclear Plant Operator (NPO #4)	SSES E Plan Table 6.1	N/A	T2/L13	NO	NO
14.	Security Officer #1	SSES E Plan Table 6.1	N/A	T2/L14	NO	NO
15.	Security Officer #2	SSES E Plan Table 6.1	N/A	T5/L15	NO	NO

Notes: ¹ Unaffected Unit Supervisor functions as the NRC Communicator
² Functions as Fire Brigade Leader during fire related response events
³ Unaffected Unit Plant Control Operator functions as E Plan Communicator

On-Shift Staffing Analysis**TABLE 2 - Plant Operations & Safe Shutdown****Analysis # 8**

Two Units - One Control Room (Shared)
Minimum Operations Crew Necessary to Implement
ONs and EOPs, or SAMGs if applicable

Applicable to unit 1 & 2

Line	Generic Title/Role	On-Shift Position	Task Performance Validation
1.	Shift Manager	Shift Manager	Operator Training
2.	Shift Supervisor	Unit Supervisor (SRO #1)	Operator Training
3.	Shift Supervisor	Unit Supervisor (SRO #2)	Operator Training
4.	Shift Technical Advisor	Shift Technical Advisor (STA)	Operator Training
5.	Shift Supervisor	Field Unit Supervisor (FBL)	Operator Training
6.	Reactor Operator #1	Plant Control Operator (PCO #1)	Operator Training
7.	Reactor Operator #2	Plant Control Operator (PCO #2)	Operator Training
8.	Reactor Operator #3	Plant Control Operator (PCO #3)	Operator Training
9.	Reactor Operator #4	Plant Control Operator (PCO #4)	Operator Training
10.	Auxiliary Operator #1	Nuclear Plant Operator (NPO #1)	Operator Training
11.	Auxiliary Operator #2	Nuclear Plant Operator (NPO #2)	Operator Training
12.	Auxiliary Operator #3	Nuclear Plant Operator (NPO #3)	Operator Training
13.	Auxiliary Operator #4	Nuclear Plant Operator (NPO #4)	Operator Training

Notes: See Table 2A for ON/EOP actions

Other (non-Operations) Personnel Necessary to Implement
 ONs and EOPs, or SAMGs if applicable

Line	Generic Title/Role	On-Shift Position	Task Performance Validation
14.	Security Officer	Security Officer #1	Security Training

Notes: Support 'Blue Max' connection activities – officer posted near location

On-Shift Staffing Analysis **Analysis #8, Table 2A – ON/EOP Actions**

Station Blackout

Procedure Step/Actions			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
EO-100-030	Attempts to start DG	NPO 4	X											
	Cycle ESW pump DC power knife switches	NPO 1 NPO 2	X											
	Press local emergency stop for each DG	NPO 4		X										
	Monitor plant parameters on available instrumentation	PCO 1 - 4	X											
	Establish ES priorities	SRO 1 SRO 2	X											
	Operate HPIC and RCIC IAW Attach A	PCO 1 PCO 3	X											
	Use SRVs to maintain pressure	PCO 1 PCO 3	X											
	Operate HPIC to maintain press	PCO 1 PCO 3					X							
	Contact TCC for system status	STA		X										
	Align busses to Attach I	PCO 2 PCO 4				X								
	Vent Hydrogen from main generator	NPO 1 NPO 2		X										
	Connecting Blue Max per ES-002-001	NPO 3		X										
	Secure non-class 250 volt DC loads	NPO 1 NPO 2							X					
	Bypass HPIC High Dry Well Press Initiation	NPO 4 FBL			X									
	Lineup fires system to RHR SW	NPO 2								X				
	Bypass RCIC Low Steam Supply Press Isolation	NPO 4 FBL						X						
	Bypass RCIC High Turbine Exhaust	NPO 4 FBL						X						

On-Shift Staffing Analysis**Station Blackout**

Procedure Step/Actions			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
	Press Trip													
	Bypass HPIC CST Low Water Level Swap	NPO 4 FBL										X		
	Bypass HPIC High Turbine Exhaust Pressure Trip	NPO 4 FBL												X
	Cross tie RWST with CSTs	NPO 1				X								

On-Shift Staffing Analysis

TABLE 3 – Firefighting

Analysis # 8

Line	Performed By	Task Analysis Controlling Method
1.	N/A	N/A
2.	N/A	N/A
3.	N/A	N/A
4.	N/A	N/A
5.	N/A	N/A

Notes: No fire Brigade response required for this event.

On-Shift Staffing Analysis**TABLE 4 – Radiation Protection & Chemistry****Analysis # 8**

Line	Position Performing Function/Task	Performance Time Period After Emergency Declaration (minutes)																	
		0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60	60-65	65-70	70-75	75-80	80-85	85-90
1.	In-Plant Survey On-Shift Position: HP																		
2.	Out of Plant Survey On-Shift Position: HP																		
3.	Personnel Monitoring On-Shift Position:																		
4.	Job Coverage On-Shift Position:																		
5.	Offsite Radiological Assessment On-Shift Position: HP #1																		
6.	Other Site-Specific HP – Describe: On-Shift Position:																		
7.	Chemistry function/task #1 – Describe: Support Field Monitoring Team On-Shift Position: Chem #1																		
8.	Chemistry function/task #2 – Describe: On-Shift Position: Chem #1																		

Notes: No HP or Chemistry response required prior to ERO augmentation.

On-Shift Staffing Analysis**TABLE 5 – Emergency Plan Implementation****Analysis # 8**

Line	Function/Task	On-Shift Position	Task Analysis Controlling Method
1.	Declare the Emergency Classification Level (ECL)	Shift Manager	EP/Ops Training and EP Drill Program
2.	Approve Offsite Protective Action Recommendations	N/A	N/A
3.	Approve content of State/local notifications	Shift Manager	EP/Ops Training and EP Drill Program
4.	Approve extension to allowable dose limits	N/A	N/A
5.	Notification and direction to on-shift staff (e.g., to assemble, evacuate, etc.)	STA	EP/Ops Training and EP Drill Program
6.	ERO notification	STA	EP/Ops Training and EP Drill Program
7.	Abbreviated NRC notification for DBT event	N/A	N/A
8.	Complete State/local notification form	Shift Manager	EP/Ops Training and EP Drill Program
9.	Perform State/local notifications	STA	EP Training and EP Drill Program
10.	Complete NRC event notification form	STA	EP/Ops Training and EP Drill Program
11.	Activate ERDS	STA	EP/Ops Training and EP Drill Program
12.	Offsite radiological assessment	N/A	N/A
13.	Perform NRC notifications	STA	EP/Ops Training and EP Drill Program
14.	Perform other site-specific event notifications (e.g., INPO, ANI, etc.)	N/A	N/A
15.	Personnel accountability	Security Officer #2	EP/Security Training and EP Drill Program

Notes: Site Area Emergency EAL MS1.
EP-PS-100 Emergency Director, Control Room

On-Shift Staffing Analysis

Event Timelines and Assumptions

Event #15 SAMG Response

Initial Conditions:

Time: Tuesday @ 0500

Unit 2 in accident condition requiring entry into SAMG (refer to Event #7)

Sequence of Events:

0525 SAMG entry conditions met; SAMG entered

On-Shift Staffing Analysis**Appendix B****Analysis #9: DBA/ISG Event # 15 - SAMG
TABLE 1 – On-shift Positions****ECL: General Emergency Conditions Exist**

Line	On-shift Position	Emergency Plan Reference	Augmentation Elapsed Time (min)	Role in Table#/Line#	Unanalyzed Task?	TMS Required?
1.	Shift Manager	SSES E Plan Table 6.1	N/A	T2/L1	NO	NO
2.	Unit Supervisor (SRO #2) ¹	SSES E Plan Table 6.1	N/A	T2/L2	NO	NO
3.	Shift Technical Advisor (STA)	SSES E Plan Table 6.1	N/A	T2/L3	NO	NO
4.	Field Unit Supervisor (FBL) ²	SSES E Plan Table 6.1	N/A	T2/L4	NO	NO
5.	Plant Control Operator (PCO #4) ³	SSES E Plan Table 6.1	N/A	T2/L5	NO	NO
6.	Nuclear Plant Operator (NPO #2)	SSES E Plan Table 6.1	N/A	T2/L6	NO	NO
7.	Nuclear Plant Operator (NPO #3)	SSES E Plan Table 6.1	N/A	T2/L7	NO	NO
8.	HP Technician (HP #1)	SSES E Plan Table 6.1	60	T4/L3	NO	NO
9.	HP Technician (HP #2)	SSES E Plan Table 6.1	60	T4/L6	NO	NO
10.	Effluents Handyman #1 (FBM #1)	SSES E Plan Table 6.1	N/A	T2/L8	NO	NO
11.	Effluents Handyman #2 (FBM #2)	SSES E Plan Table 6.1	N/A	T2/L9	NO	NO
12.	Effluents Handyman #3 (FBM #3)	SSES E Plan Table 6.1	N/A	T2/L10	NO	NO
13.	Effluents Handyman #4 (FBM #4)	SSES E Plan Table 6.1	N/A	T2/L11	NO	NO

Notes: ¹ Unaffected Unit Supervisor functions as the NRC Communicator
² Functions as Fire Brigade Leader during fire related response events
³ Unaffected Unit Plant Control Operator functions as E Plan Communicator

On-Shift Staffing Analysis**TABLE 2 - Plant Operations & Safe Shutdown**Analysis # 9

Two Units - One Control Room (Shared)
Minimum Operations Crew Necessary to Implement
SAMGs if applicable

Applicable to unit 2

Line	Generic Title/Role	On-Shift Position	Task Performance Validation
1.	Shift Manager	Shift Manager	Operator Training
2.	Shift Supervisor	Unit Supervisor (SRO #2)	Operator Training
3.	Shift Technical Advisor	Shift Technical Advisor (STA)	Operator Training
4.	Shift Supervisor	Field Unit Supervisor (FBL)	Operator Training
5.	Reactor Operator #4	Plant Control Operator (PCO #4)	Operator Training
6.	Auxiliary Operator #2	Nuclear Plant Operator (NPO #2)	Operator Training
7.	Auxiliary Operator #3	Nuclear Plant Operator (NPO #3)	Operator Training

Notes: See Table 2A for SAMG actions

Other (non-Operations) Personnel Necessary to Implement
 SAMGs if applicable

Line	Generic Title/Role	On-Shift Position	Task Performance Validation
8.	Effluents Handyman #1	Fire Brigade Member #1	Fire Brigade Training
9.	Effluents Handyman #2	Fire Brigade Member #2	Fire Brigade Training
10.	Effluents Handyman #3	Fire Brigade Member #3	Fire Brigade Training
11.	Effluents Handyman #4	Fire Brigade Member #4	Fire Brigade Training

Notes: See Table 2A for SAMG actions

On-Shift Staffing Analysis
Analysis #9, Table 2A – ON/EOP Actions

SAMG (Unit #2)

Procedure Step/Actions			Performance Time (mins) After Procedure Implementation											
Proc/Step	Task	Assigned Resource	0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60
EP-DS-003	Using low pressure ECCS to control injections to maintain steam lines flooded	PCO4											X	
EP-DS-002 Steps: RC/F-11 RC/F-23 RC/F-31 RC/F-40 RC/F-47 RC/F-48 RC/F-55 RC/F-56	Effluents provide portable pump truck	Effluents Handyman 1, 2, 3, 4											X	

On-Shift Staffing Analysis**TABLE 3 – Firefighting****Analysis # 9**

Line	Performed By	Task Analysis Controlling Method
1.	N/A	N/A
2.	N/A	N/A
3.	N/A	N/A
4.	N/A	N/A
5.	N/A	N/A

Notes: No Fire Brigade response required for this event.

On-Shift Staffing Analysis

TABLE 4 – Radiation Protection & Chemistry

Analysis # 9

Line	Position Performing Function/Task	Performance Time Period After Emergency Declaration (minutes)																	
		0-5	5-10	10-15	15-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55	55-60	60-65	65-70	70-75	75-80	80-85	85-90
	In-Plant Survey On-Shift Position: HP																		
	Out of Plant Survey On-Shift Position: HP																		
	Out of Plant Survey Perform surveys (Near Site) On-Shift Position: HP											X	X						
	Personnel Monitoring On-Shift Position:																		
	Job Coverage On-Shift Position:																		
	Offsite Radiological Assessment On-Shift Position: HP #1											X	X						
	Other Site-Specific HP – Describe: On-Shift Position:																		
	Chemistry function/task #1 – Describe: Support Field Monitoring Team On-Shift Position: Chem #1																		
	Chemistry function/task #2 – Describe: On-Shift Position: Chem #1																		

Notes: HP continue performing actions from Event #7

EP-PS-108, HP Tech 1 (OSCAR)

EP-PS-130, HP II Dose Calculator

Note that HP#2 may be asked to provide radiological monitoring /survey by Shift Manager depending upon actual emergency conditions.

This is acceptable since On-site (out-of-plant) HP Tech is not required until 60 minutes IAW Emergency Plan Table 6.1.

On-Shift Staffing Analysis**TABLE 5 – Emergency Plan Implementation****Analysis # 9**

Line	Function/Task	On-Shift Position	Task Analysis Controlling Method
1.	Declare the Emergency Classification Level (ECL)	N/A	N/A
2.	Approve Offsite Protective Action Recommendations	N/A	N/A
3.	Approve content of State/local notifications	N/A	N/A
4.	Approve extension to allowable dose limits	N/A	N/A
5.	Notification and direction to on-shift staff (e.g., to assemble, evacuate, etc.)	N/A	N/A
6.	ERO notification	N/A	N/A
7.	Abbreviated NRC notification for DBT event	N/A	N/A
8.	Complete State/local notification form	N/A	N/A
9.	Perform State/local notifications	N/A	N/A
10.	Complete NRC event notification form	N/A	N/A
11.	Activate ERDS	N/A	N/A
12.	Offsite radiological assessment	N/A	N/A
13.	Perform NRC notifications	N/A	N/A
14.	Perform other site-specific event notifications (e.g., INPO, ANI, etc.)	N/A	N/A
15.	Personnel accountability	N/A	N/A

Notes: Emergency Plan Actions taken during Event #7
EP-PS-100 Emergency Director, Control Room

On-Shift Staffing Analysis

Appendix C
Phase III Time Motion Study Analysis Results

On-Shift Staffing Analysis

The results of the Phase II On-Shift Staffing Analysis conducted September 10-12, 2012 identified three (3) events with potential conflicts requiring further Phase III Time Motion Study analysis. These events are listed in Table 1 below.

Table 1 Susquehanna – Phase III Time Motion Study Events			
Event/Scenario	Functions to be Evaluated	Affected Position	TMS Method
Design Basis Threat	NRC Abbreviated Call	Shift Technical Advisor	Simulator Run
	Evaluate E Plan entry with SM		
	ERO Notification		
	Complete NRC Form		
	NRC Notification		
Control Room Fire with Evacuation and Remote Shutdown	Report to OSC/OCC for E Plan Implementation	Shift Technical Advisor	Simulator Run/ Walkthrough
	ERO Notification		
	Perform State/Local Notifications		
	Completed NRC Form		
	NRC Notification		
Station Blackout	Contact TCC	Shift Technical Advisor	Simulator Run
	ERO Notification		
	Perform State/Local Notifications		
	Complete NRC Form		
	NRC Notifications		

On November 12, 2012, the selected scenarios for Time Motion Study (TMS) were conducted in the Susquehanna Station Operations Training Center on the simulator and using walkthroughs as appropriate. In attendance to conduct the TMS Scenarios were:

Dave Walsh	Operations – Shift Manager
Doug LaMarca	Operations – Unit Supervisor – U1 (SRO #1)
Robert Bingman	Operations – Unit Supervisor – U2 (SRO #2)
David Borger	Operations – Unit Supervisor (STA)
Arnold Avery	Operations – Plant Control Operator – OATC U1 (RO #1)
Gordon Shellenberger	Operations – Plant Control Operator – BOP U1 (RO #2)
Patrick Bone	Operations – Plant Control Operator – BOP U2 (RO #4)
Ian Missien	EP
Rodney Brown	EP Consulting, LLC
Rex Krohn	EP Consulting, LLC
Judi Sanquist	EP Consulting, LLC

The following tables document the results of the TMS for the identified events.

On-Shift Staffing Analysis

APPENDIX D
Function / Responsibility (Task) Analysis Template

Event: Design Bases Threat (Event #1)Position: Shift Technical AdvisorLine #: T2/L4, T5/L6, T5/L10, T5/L13

Function	Responsibility (Task)	Action Step	Duration
1. Notifications	1.1 ERO Notifications	1.1.1 STA activates Alt ERO @0948 IAW EP-PS-135	< 1 minute
	1.2. Complete NRC form	1.2.1 STA uses EP-PS-135, Tab 10 for initial NRC notification as a guide to answer questions	N/A
	1.3. Perform NRC Notifications	1.3.1 STA initiates NRC 50.72 Notification ¹ @1001	7 minutes
		1.3.2 NRC notification completed - NRC open line maintained @1007	
2. ON/EOP Function ¹	2.1. NRC Abbreviated Call	2.1.1 STA perform immediate notification to NRC - OS2 - Rapid Notification @0943	1 minute
	2.2. Evaluate E Plan entry with Shift Manager	2.2.1 Shift Manager entering E Plan - Directs STA to look at Attachment G and EP-TP-001@0941	4 minutes
		2.2.2 EAL - OS2 SAE declared @0945	
Conflicts for the STA were adequately demonstrated during the Time Motion Study (TMS). The location of the Emergency Notification System (ENS) phone allows the STA to monitor plant data on the Plant Process Computer. This enables the STA to maintain continuous communication while continuing to monitor plant conditions/status (STA function). Note that cordless SpectraLink phones are available to on-shift personnel, if desired.			
¹ NRC Form 361 completed and provided to NRC HOO IAW EP-PS-135 and NDAP-QA-0720 within 1 hour of event classification.			
² ON/EOP Functions are related to Emergency Plan Implementation – not a conflict.			

On-Shift Staffing Analysis

Design Basis Threat (Event #1) - Timeline

Time	Task
0938	Crew has "shift"/Unit
0940	Control Room Shift Manager receives phone call from security
	Adversaries attempting to breach PA fence
	Update provided to Control Room Personnel
	Unit 1 Control Room Supervisor and Unit 2 Control Room Supervisor entering ON-000-010
0941	Shift Manager entering E Plan - Directs STA to look at Attachment G
	Inside/Outside isolation zone - attempting to breach inner fence
	SM and STA review EALs
0942	Control Room crew start Plant Shut Down
	Unit 1 & 2 performing SCRAM actions - imminent scram
	RO notifies Generation - units going offline
	OATC calls TCC to report trip
0943	Reactor Trip
	STA perform immediate notification to NRC
	Shift Manager begins to complete State/Local Notification Form
0945	PCOs dispatched to RSDP - Unit 1 and Unit 2
	Site Area Emergency (SAE) declared (EAL OS2)
	Adversaries have breached PA fence - in PA
	STA will have to perform communications - State/NRC
0946	Unit 2 CRS notified Security that 2 PCOs going to Remote Shutdown Panel (RSDP)
0947	Shift Manager provides completed State/Local form (ENR) to STA for peer check
0948	Peer check completed
	STA activates Alt ERO (Alternate ERO activation process) IAW EP-PS-135, NRC Communicator
	Shift Manager reviewing Plant conditions - oversight
0949	Unit 1 using DIV2 for SD cooling - Unit 2 DIV2 - Unit 2 PCO monitoring EDG Start-up
	Shift Manager working thru EOP
0951	STA begins review of ENR form with State/Locals
0953	ENR notification completed w/State/Locals
	Shift Manager updates crew – E-Plan entry - Now Site Emergency Director (SED)
0955	Completes State/Local Notifications
	Security informs Shift Manager that adversaries have been neutralized - immediate threat is clear
	STA validating ERO activation
	Duck and cover still in effect
0956	Unit 2 CRS makes PA announcement - SAE
	STA notifying Generation Plant Dispatch of plant condition status (security event)
	Both units offline
0957	Shift Manager getting update on plant status from Control Room Supervisor
0958	Unit 1 Control Room Supervisor and Shift Manager discussing plant condition

On-Shift Staffing Analysis

Time	Task
0959	Discussion ends
1000	Control Room Supervisor and Shift Technical Advisor discussing prognosis STA and SM reviewing current conditions prior to contacting NRC
1001	STA initiates NRC 50.72 Notification - follow up information CRS updating SM - no more mitigating actions are being taken at this time
1002	CRS and SM reviewing on-going actions. SM reviewing SPDS/Plant Status Computer
1003	Review completed
1005	SM and CRS reviewing current status on unit
1006	Review completed
1007	NRC notification completed - NRC open line maintained
1009	TMS Terminated

On-Shift Staffing Analysis

APPENDIX D
Function / Responsibility (Task) Analysis TemplateEvent: Control Room Fire w/evacuation (Event #12)Position: Shift Technical AdvisorLine #: T2/L4, T5/L6, T5/L9, T5/L10, T5/L13

Function	Responsibility (Task)	Action Step	Duration
1. Notifications	1.1 ERO Notification	1.1.1 STA activities alternate ERO notification @1051 IAW EP-PS-135	1 minute
		1.1.2 STA calls Security to verify ERO activation @1052	
	1.2 Perform State/Local Notification	1.2.1 STA starts ENR notification to PEMA @1104	3 minutes
		1.2.2 Complete PEMA notification @1107	
		1.2.3 STA starts ENR notification to CCEMA @1107	3 minutes
		1.2.4 Completes CCEMA notification @1110	
		1.2.5 STA starts ENR notification to LCCEMA @1110	3 minutes
		1.2.6 Completes LCCEMA notification @1113	
		Total time for State/Local notifications	9 minutes
		1.2.7 STA starts ENR notification to PIM @1113	4 minutes
		1.2.8 Completes PIM notification @1117	
	1.3 Complete NRC Form	1.3.1 STA uses EP-PS-135, Tab 10 as guide	N/A
	1.4 Perform NRC Notification	1.4.1 STA calls NRC about the Alert classification @1123	<1 minute
		1.4.2 NRC requests an open line for communications	N/A
2. ON/EOP Implementation	2.1 Report to OCC/OSC for E-Plan Implementation	2.1.1 Shift Manager (SM) and STA travel to OCC/OSC @1052	5 minutes
		2.1.2 SM and STA arrive at OCC/OSC @1057	

TMS analysis started in the Simulator Control Room until evacuation by Control Room personnel. Upon evacuation, the Control Room Supervisors and Reactor Operators report to the Remote Shutdown Panels to complete assigned actions. During the TMS these individuals reported to the Remote Shutdown Panels located in the simulator. Upon evacuation, the Shift Manager and STA report to the OCC/OSC to complete assigned actions. A transit time of 5 minutes from the Control Room to the OCC/OSC has been determined by Susquehanna personnel. This time was used during this TMS analysis. To complete the walkthrough activities, the Shift Manager and STA remained in the Simulator Control Room and used only the equipment available in the OCC/OSC to complete notifications (the OCC/OSC has regular phones (i.e., no ringdown phone) and EPIPs available for use as well as computers with access to the plant data system). During this event, the STA primary function is notifications with the Shift Manager maintaining oversight and monitoring plant conditions/status. ERO notification was initiated prior to Control Room evacuation. State/Local Notifications were completed within 9 minutes with the NRC notification being initiated 10 minutes afterwards. Use of the 'Spectra Link' phones in the OCC/OSC enables the STA to maintain continuous communication with the NRC while still monitoring plant conditions/status. All conflicts were resolved during the TMS.

On-Shift Staffing Analysis**Control Room Fire with Evacuation and Remote Shutdown (Event #12) – Timeline**

Time	Task
1048	Control Room (CR) crew has the shift
1050	Simplex Fire alarm in CR on control board 1C601 – flames & smoke observed CR crew attempts to extinguish fire
1051	PA announcement for CR evacuation, by Unit 1 Control Room Supervisor (CRS) STA calls Security to inform that the CR is evacuating the CR and moving to the remote Shutdown Panels – CR crew scrams both units
1051	STA activates alternate ERO IAW EP-PS-135
1052	PA announcement for Unit 1 & Unit 2 Rx scrams STA calls Security to verify ERO activation
1052	Shift Manager (SM) and STA travel to OCC/OSC to perform their duties
1057	SM and STA arrive at OCC/OSC, discuss E-Plan classification, and start working through their procedures (SAE if fire control not establish in 15 minutes)
1059	Both Unit 1 & Unit 2 CR crews arrive at remote Shutdown panels
1101	SM declares an Alert (EAL OA4)
1102	SM receives call from remote Shutdown panels that they have control of the plant as of 1100
1102	SM hands STA Emergency Notification Report (ENR) for State/Local notifications
1104	STA starts ENR notification to PEMA
1107	Complete PEMA notification
1107	STA starts ENR notification to CCEMA
1107	SM receives update from both remote Shutdown panels on plant conditions
1108	Both CRS announce to crews about Alert classification
1110	Completes CCEMA notification
1110	STA starts ENR notification to LCEMA
1113	Completes LCEMA notification
1113	STA starts ENR notification to Public Information Manager (PIM)
1117	Completes PIM notification
1117	STA calls TCC about Rx trips and CR Fire
1117	STA calls Generation Power Dispatch about Rx trips and CR Fire
1117	CRS update SM on plant conditions from Shutdown panels
1118	STA progressing through his procedure
1119	STA performs PA announcement for Alert classification
1120	STA reviews SPDS before NRC notification
1121	SM and STA discuss plant conditions
1123	STA calls NRC about the Alert classification and plant conditions NRC request that STA maintain an open line of communications – with headset, speaker on mute
1129	SM receives update from both Shutdown panels
1133	TMS terminated

On-Shift Staffing Analysis

APPENDIX D
Function / Responsibility (Task) Analysis Template

Event: Station Blackout (Event #13)Position: Shift Technical AdvisorLine #: T2/L4, T5/L6, T5/L9, T5/L10, T5/L13

Function	Responsibility (Task)	Action Step	Duration
1. Notifications	1.1 ERO Notification	1.1.1 SRO #2 activates ERO (Emergency Response Organization) @ 0825 IAW EP-PS-135	1 minute
		1.1.2 ERO Pager activation verified by SRO #2 @ 0826	
	1.2. Perform State/Local Notification	1.2.1 STA initiates State/local Notifications @0823	4 minutes
		1.2.2 STA completes State/Local Notifications @ 0827	
	1.3. Complete NRC Form	1.3.1 No NRC Form completed based on Shift Manager decision to notify NRC and follow-up later with completed ENS form (using EP-PS-135, Tab 10)	N/A
	1.4. Perform NRC Notification	1.4.1 SRO #2 notifies NRC – reviews information contained in EP-PS-135 @ 0840	11 minutes
		1.4.2 SRO #2 directed by NRC to maintain continuous communication @ 0851	
2. ON/EOP Implementation	2.1. Contact TTC	2.1.1 U2 Control Room Supervisor (SRO #2) contacts TCC (Transmission Control Center) @0814	1 minute
Conflicts for the Shift Technical Advisor were resolved by the Shift Manager assigning ERO and NRC notifications to the U2 Control Room Supervisor (SRO #2) once unit was stabilized. STA performed State/Local Notifications within 4 minutes and was available to provide support as directed by the Shift Manager as well as monitoring plant status/conditions.			

On-Shift Staffing Analysis**Station Blackout (Event #13) – Timeline**

Time	Task
0809	Control Room Crew has shift
0811	Station Blackout/Rx Trip (both units)
	Rx Trip PA Announcement (RO #2)
	Entering ON/EOP based on low reactor water level and Station Blackout
0812	Shift Manager (SM) directs Shift Technical Advisor (STA) to review E Plan (enter EP-TP-001, ERO Independent Verification Procedure)
0812	U1 Control Room Supervisor (SRO #1) implementing actions from Reactor Water Low flowchart – providing direction to Plant Control Operators (PCO) as needed
0813	Unit 1 PCO (OATC - RO #1) directed to start Emergency Diesel Generators (EDGs)
	RO #1 directs Nuclear Plant Operator (NPO) to manually start all EDGs
	SRO #1 updates SM on ES Flowchart status
0814	U2 Control Room Supervisor (SRO #2) contacts TCC (Transmission Control Center) concerning loss of offsite power and anticipated return to service – call completed in less than 1 minute
0815	STA reviewing plant conditions
	SRO #2 updates SRO #1 on securing EDG emergency start logic – conserve battery
0816	SM determines Emergency Classification, receives concurrence from STA
	SM starts to complete State/Local Notification Form
0819	Site Area Emergency declared (EAL MS1)
0820	SM completes and approves State/Local Notification Form
0821	STA directed to complete Offsite Agency notifications (State/Local/NRC)
0823	STA initiates State/local Notifications
0825	SRO #2 activates ERO (Emergency Response Organization) by pressing applicable button on phone IAW EP-PS-135, NRC Communicator (<1 minute to complete)
0826	ERO Pager activation verified by SRO #2
0827	STA completes State/Local Notifications
0830	SM and STA reviewing current plant status and conditions (oversight)
0833	SM, STA, SRO #2 discuss ERDS capability/activation (in this scenario ERDS would not be available to transmit data due to loss of Process Computer – discussed with crew during debrief)
0836	SM determines need to conduct Site Accountability – directs STA to initiate
0837	SRO #2 announces event classification (PA Announcement)
0838	Site Accountability initiated by STA (alarm) and SRO #2 (PA Announcement)
0840	SRO #1 provides crew update – exiting EOP within ½ minute
0840	SRO #2 notifies NRC – reviews information contained in EP-PS-135, NRC Communicator (no NRC Form completed based on Shift Manager decision to notify NRC and follow-up later with completed form)
0842	Crew Brief initiated
0844	Crew Brief completed
0848	SM and STA review current plant status/conditions
0850	SM updates SRO #2 on current priorities based on NRC request
0851	SRO #2 directed by NRC to maintain continuous communication
0854	TMS Terminated

On-Shift Staffing Analysis

Phase III Time Motion Study Results


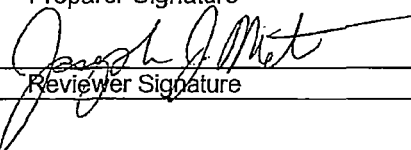
1. Design Basis Threat – The identified conflicts for the Shift Technical Advisor were adequately demonstrated during the TMS.
2. Control Room Fire with Evacuation and Remote Shutdown – The identified conflicts for the Shift Technical Advisor were adequately demonstrated during the TMS.
3. Station Blackout – The identified conflicts for the Shift Technical Advisor were adequately demonstrated during the TMS.

Attachment 3 to PLA-7439
10 CFR 50.54(q) Screens and Evaluations

Attachment A, 10CFR50.54q Screening Form

Screening Number: S2015-12-10-01 Rev 1		
Part I. Description of Activity Being Reviewed (event or action, or series of actions that may result in a change to the Emergency Plan or affect the implementation of the Emergency Plan). Provide the existing text and the revised text (attaching a mark-up of the existing text with proposed change can be used as an alternative): Annual Update to the SSES Emergency Plan. Rev 58 to Rev 59. See attachment for changes.		
Part II. Activity a Change per Section 3.1.3? Does the activity constitute a change per definition 3.1.3 - An action that results in modification or addition to, or removal from the SSES Emergency Plan, OR the resources, capabilities and methods identified in the plan? Justification: See attachment	<input checked="" type="checkbox"/> YES Continue to next part	<input type="checkbox"/> NO 10 CFR 50.54(q) Evaluation is NOT required. Enter justification and complete Part VI.
Part III. Activity Previously Reviewed? Is this activity fully bounded by an NRC approved 10 CFR 50.90 submittal or Alert and Notification System Design Report (44 CFR 350.14)? If YES, identify bounding source document number/approval reference and ensure the basis for concluding the source document fully bounds the proposed change is documented below: Justification:	<input type="checkbox"/> YES 10 CFR 50.54(q) Evaluation is NOT required. Enter justification and complete Part VI.	<input checked="" type="checkbox"/> NO Continue to next part
<input type="checkbox"/> Bounding document attached (optional)		
Part IV. Editorial Change Is this activity an editorial or typographical change such as formatting, paragraph numbering, spelling, or punctuation that does not change intent?	<input type="checkbox"/> YES 10 CFR 50.54(q) Evaluation is NOT required. Enter justification and complete Part VI.	<input checked="" type="checkbox"/> NO Continue to next part
Justification: See attachment for some items that are editorial while others are not.		
Part V. Emergency Planning Element/Function Screen (Associated 10 CFR 50.47(b) planning standard function identified in brackets.) If this activity affects any of the following, including program elements from NUREG-0654/FEMA REP-1 Section II, then place a check in the appropriate box.		
1. Responsibility for emergency response is assigned. [1]	<input type="checkbox"/>	
2. The response organization has the staff to respond and to augment staff on a continuing basis (24/7 staffing) in accordance with the Emergency Plan. [1]	<input type="checkbox"/>	
3. The process ensures that on shift emergency response responsibilities are staffed and assigned. [2]	<input checked="" type="checkbox"/>	
4. The process for timely augmentation of on-shift staff is established and maintained. [2]	<input checked="" type="checkbox"/>	
5. Arrangements for requesting and using off site assistance have been made. [3]	<input checked="" type="checkbox"/>	
6. State and local staff can be accommodated at the EOF in accordance with the Emergency Plan. [3]	<input type="checkbox"/>	
7. A standard scheme of emergency classification and action levels is in use. [4]	<input type="checkbox"/>	
8. Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes after declaration of an emergency and providing follow-up notifications. [5]	<input checked="" type="checkbox"/>	

Attachment A, 10CFR50.54q Screening Form, Continued

Part V. Emergency Planning Element/Function Screen (cont.) (Associated 10 CFR 50.47(b) planning standard identified in brackets.) If this activity affects any of the following, including program elements from NUREG-0654/FEMA REP-1 Section II, then place a check in the appropriate box.		
9. Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway. [5]	<input type="checkbox"/>	
10. The public ANS meets the design requirements of FEMA-REP-10, Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants, or complies with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter. [5]	<input checked="" type="checkbox"/>	
11. Systems are established for prompt communication among principal emergency response organizations. [6]	<input type="checkbox"/>	
12. Systems are established for prompt communication to emergency response personnel. [6]	<input type="checkbox"/>	
13. Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway Emergency Planning Zone (EPZ). [7]	<input type="checkbox"/>	
14. Coordinated dissemination of public information during emergencies is established. [7]	<input type="checkbox"/>	
15. Adequate facilities are maintained to support emergency response. [8]	<input checked="" type="checkbox"/>	
16. Adequate equipment is maintained to support emergency response. [8]	<input type="checkbox"/>	
17. Methods, systems, and equipment for assessment of radioactive releases are in use. [9]	<input type="checkbox"/>	
18. A range of public PARs is available for implementation during emergencies. [10]	<input checked="" type="checkbox"/>	
19. Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities. [10]	<input checked="" type="checkbox"/>	
20. KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public [10]	<input type="checkbox"/>	
21. A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events. [10]	<input checked="" type="checkbox"/>	
22. The resources for controlling radiological exposures for emergency workers are established. [11]	<input type="checkbox"/>	
23. Arrangements are made for medical services for contaminated, injured individuals. [12]	<input type="checkbox"/>	
24. Plans for recovery and reentry are developed. [13]	<input type="checkbox"/>	
25. A drill and exercise program (including radiological, medical, health physics and other program areas) is established. [14]	<input type="checkbox"/>	
26. Drills, exercises, & training evolutions that provide performance opportunities to develop, maintain, & demonstrate key skills are assessed via a formal critique process in order to identify weaknesses. [14]	<input type="checkbox"/>	
27. Identified weaknesses are corrected. [14]	<input type="checkbox"/>	
28. Training is provided to emergency responders. [15]	<input checked="" type="checkbox"/>	
29. Responsibility for Emergency Plan development and review is established. [16]	<input checked="" type="checkbox"/>	
30. Planners responsible for Emergency Plan development and maintenance are properly trained. [16]	<input type="checkbox"/>	
APPLICABILITY CONCLUSION <input type="checkbox"/> If no Part V criteria are checked, a 10 CFR 50.54(q) Evaluation is NOT required; complete Part VI. <input checked="" type="checkbox"/> If any Part V criteria are checked, complete Part VI and perform a 10 CFR 50.54(q) Evaluation.		
Part VI. Signatures:		
Jacob Garcia		1-13-16
Preparer Name (Print) (JFG EP109)	Preparer Signature	Date
JOE METER		1/13/16
Reviewer Name (Print) (JFG EP109)	Reviewer Signature	Date

EP Rev 59 revision details for, S2014-12-10-01 and E2014-12-10-01 Part I, Rev 1:

1. Revision 59 of the Emergency Plan is taking credit for the 2016 annual review of the Emergency Plan.
 - a. Administrative, No 54.54Q Evaluation Required
2. Added additional EP Implementing Procedures, EP Administrative procedure, in addition to EP Position Specific (EP-PS) procedures (that were already present) to Appendix C (ACT-46-CR-2015-11640)
 - a. Specifically added the below

OTHER EMERGENCY PLAN RESPONSE PROCEDURES	
Emergency Telephone Instructions and Directory	Susquehanna Offsite Organization Response to Plant Events
Remote Assembly Area Contamination Control	Termination and Restoration
Brief Non-Technical Description of EALs	EAL Classification Bases
SSES MIDAS-NU User Manual	Personnel Accountability

3. Added the following to the RM responsibilities in section 6.3.1.1 "Authorize issuance of Radioprotective Drugs in accordance with prescribed procedures. This should include consultation with the Dose Assessment Supervisor and medical consultants." To align with ED responsibilities in 6.2.1. (Comment from a RPC)
4. Added "or Control Room" in section 6.0 and 6.3 when discussing the EOF is required to activate following a SAE or GE and take over the management of the emergency regardless if the TSC or Control Room is in control. (Comment from the EP manager)
 - a. Specifically modified the following sentences:

6.0 "The EOF is required to activate following a Site Area Emergency or General Emergency classification and take over management of the emergency from the TSC or Control Room within 90 minutes of the Site Area Emergency or higher classification."

6.3 "The EOF is required to activate following a Site Area Emergency or General Emergency classification for the purpose of taking over management of the emergency from the TSC or Control Room within 90 minutes of the Site Area Emergency or higher classification."
5. Appendix A, Changed the Manager of EP is responsible for reviewing letters of agreement every two years to 'yearly' and added LOAs are to be completed annually to Section 9.2.1. (DI-2015-20163)

- a. Specifically modified the following sentences: "The Manager Emergency Preparedness is responsible for renewing letters of agreement every ~~two~~ years where applicable. In some instances, where the letter of agreement is for a specified duration longer than 12 years, letters need not be renewed until the end of the specified duration."
 - b. For Section 9.2.1 Added "Annual review of Letters of Agreement" under SSES Emergency Plan.
6. Added language to describe the Alternate OSC and TSC at the EOF in Section 8.2
 - a. Specifically added the following:
 - 8.2.3 Alternate Operations Support Center (OSC)

The alternate OSC is accessible even if the site is under threat of or experiencing hostile action since it is located within the Emergency Operations Facility. It functions as a staging area for OSC staff and has the capability for communication with the emergency operations facility, control room, and plant security. The alternate OSC provides the OSC staff with the capability for damage control team planning and preparation when the primary OSC and backup OSC cannot be safely accessed during hostile action.
 - 8.2.4 Alternate Technical Support Center (TSC)

The alternate TSC is accessible even if the site is under threat of or experiencing hostile action since it is located within the Emergency Operations Facility. It functions as a staging area for TSC staff and has the capability for communication with the emergency operations facility, control room, and plant security. The alternate TSC provides the TSC staff with the capability to perform offsite notifications and for engineering assessment activities when the primary TSC cannot be safely accessed during hostile action.
7. Changed EP from meaning Emergency Plan to meaning Emergency Preparedness in Section 2.0
 - a. Editorial
8. Changed ANS tone alerting from 3-5 to just 3 minutes in Section 8.5 to match the approved FEMA design report for SSES. (Comment from ANS owner)
 - a. Specifically modified the following sentence: "The Nuclear Emergency Alert signal is a ~~steady~~ 3 5 minute steady tone.
9. Corrected typographical error on table 6.1 in regards to when the EPlan and NRC communicators are required. Added NRC Comm and EPlan Comm as required for TSC activation in Figure 6.2. Updated Figure 6.7 Offsite Communications to clearly show which is NRC and which is EPlan Communicator. Removed EOF Communicator from the NRC side.

10. Corrected incorrect reference to Figure 6.3 in Table 6.1 to Figure 6.4 and changed the # footnote to state "2 are dispatched from the vicinity of the plant within 60 minutes" to match PLA-5589. (ACT-01-CR-2015-07468)
 - a. Specifically made the following changes: Radiological monitoring team personnel (see Figure 6.43) 2 are dispatched from the vicinity of the plant at within 60 minutes
11. Updated Appendix J Section J to include Security Coordinator, Control Room Emergency Director and TSC Emergency Director Position. Updated 7.3 Protective Actions: second sentence add after SSES Exclusion Area and Site Boundary. Third sentence remove the words SSES Exclusion Area and replace them with Site Boundary. Clarified the definition of On-Site to be "the area within the PROTECTED AREA". Updated 7.3.1.4 by replacing "within the SSES Exclusion Area" with "on-site". (CR-2015-26179)

Specifically made the following changes:

- a. Section 7.3 Protective actions are implemented to prevent or mitigate consequences to individuals during or after a radiological incident. Protective action recommendations within the SSES Exclusion Area and Site Boundary are the responsibility of the ED, but may include assistance by the EOF. Protective actions outside the ~~SSES Exclusion Area~~ Site Boundary are primarily the responsibility of State and local emergency organizations, but may include coordination of activities, dissemination of appropriate data, and recommendations by the ED or Recovery Manager
- b. Definition of ON SITE – ~~the area with the EXCLUSION AREA boundary~~ the area within the PROTECTED AREA
- c. A Site Evacuation requires that all individuals ~~within the SSES Exclusion Area~~ on-site, except for Control Room operations personnel and others with specific emergency assignments, leave the site
- d. Appendix J

J. Protective Response	
1.a., b., c., d.	Chapter 7, Section 7.3, 7.3.1, 7.3.2 Appendix C, Position Specific Instruction for: <ul style="list-style-type: none"> • Control Room Emergency Plan Communicator • TSC Emergency Plan Communicator • Radiation Protection Coordinator • Security Coordinator • Control Room Emergency Director • TSC Emergency Director

12. Revised 7.3.1.3 to include direction for when accountability is performed after a rapid evacuation by now stating "For certain security related events, an evacuation of non-essential personnel may be conducted prior to performing

accountability. Security will collect badges upon egress from the site and then perform accountability.” (ACT-37-CR-2015-11640)

13. Revised Section 9.2.1 to include the regulatory requirement for when the ETE shall be updated by adding “Perform an annual review of the Evacuation Time Estimate (ETE) to ensure 10CFR50 Appendix E Section IV and NUREG 0654 Element J.8 requirements are maintained. Update the full ETE should the criteria from Appendix E be met and re-submit the ETE to the NRC.” (ACT-48- CR-2015-11640)

14. Added non-delegable duties to the ED and RM in sections 6.2.1 and 6.3.1.1 to state “Classification of EALs, Notification of EALs and Protective Action Recommendations” (ACT-38-CR-2015-11640)

a. Specifically added the following for 6.2.1: “The Shift Manager assumes the role of Emergency Director (ED) until he is relieved by a qualified Emergency Director or a qualified Recovery Manager (RM). Non-delegable duties (duties the ED cannot delegate except to another qualified ED or RM) are duties related to classification of emergencies, decision to notify state and local agencies, and Protective Action Recommendations.”

b. Specifically added the following for 6.3.1.1: “Non-delegable duties (duties the RM cannot delegate except to another qualified ED or RM) are duties related to classification of emergencies, decision to notify state and local agencies, and Protective Action Recommendations.”

15. Corrected Attachment J Section H number 2 from 8.2.2 to 8.1.2.2. (AR-2015-19300)

a. Editorial

16. Added RM and Dose Assessment Personnel to Table 9.1. (DI-2015-20156)

a. Specifically added the following:

2. Personnel responsible for accident assessment/ management	Emergency Director; Emergency Coordinators, Recovery Manager, Dose Assessment Personnel	Initial training: EP and EP PSs. Retraining: Applicable EP PSs and changes. Frequency: Annual
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17. Revised Table 7.3 to state under section A.c. "Evacuate 2 mile radius, if NOT previously recommended" and to state "If the state has informed SSES of impediments to evacuation recommend shelter in place instead of evacuate." (AR-2015-19129)

a. Specifically made the following changes:

<p>A. Airborne Release (Cont'd)</p> <p>1. General Public (Cont'd)</p>	<p>Determine the following:</p> <p>3. Weather Conditions, affect effect on dose projections.</p> <p>4. Dose projections and avoided dose.</p>	<p>3. If RPSA or HAB conditions do not apply, or for all other General Emergencies, ERO shall consider the following subsequent PARs based on dose assessment results or changes in wind direction affecting new sectors, if conditions exist which would require classification of a General Emergency per EALs:</p> <ul style="list-style-type: none"> a. Evacuate additional affected sectors 2-5 miles downwind b. Evacuate all sectors where PAGs were exceeded or are projected to be exceeded c. Evacuate 2 mile radius, IF <u>NOT</u> previously recommended <p>3.1. When there is a Controlled Containment Venting of less than an hour AND a valid dose assessment projects doses less than 1000 mrem TEDE and less than 5000 mrem Adult Thyroid CDE at EPB AND the PAR is issued by extended ERO (TSC or EOF):</p> <ul style="list-style-type: none"> a. Shelter additional affected sectors 2-5 miles downwind <p>If the state has informed SSES of impediments to evacuation, recommend shelter "in place" instead of "evacuate".</p> <p>The PAR methodology described above complies with 10CFR50.47(b)(10), Appendix E to Part 50, Section IV Paragraph 3 and NUREG-0654, Supplement 3, Rev 1.</p>
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18. Updated Table 7.3 section B language to change Quantity to Volume and to add diluted sum (Comment from a DASU)

a. Specifically made the following change:

<p>B. Liquid Radioactive Release Into Susquehanna River</p>	<ol style="list-style-type: none"> 1. Determine the following: <ol style="list-style-type: none"> a. Source of release b. Quantity Volume (approx.) of release c. Anticipated length of time release will continue 2. Notify: <ol style="list-style-type: none"> a. DEP/BRP b. Danville Water authority c. NRC 3. Initiate sampling of: <ol style="list-style-type: none"> a. Release point b. Susquehanna River 4. Initiate projections of radionuclide activity concentrations at the Danville Water Authority. 	<p>If the equivalent of an EC fraction of 0.85 is exceeded at Danville where an EC (effluent concentration) is the radionuclide-specific concentration value from Column 2 of Table 2 of Appendix B to 10CFR20. A single isotope exceeds its specific effluent concentration (EC) value from Column 2 of Table 2 of Appendix B to 10CFR20 or diluted sum of EC fractions at Danville is greater than 0.85.</p>	<ol style="list-style-type: none"> 1. Recommend to DEP/BRP that consideration be given to termination of user intake of all downstream users. 2. Assess additional results of sampling and analyses of radionuclide activity concentrations of SSES liquid effluent and/or Susquehanna River water upstream of the Danville Water Authority, and provide appropriate updated recommendations to DEP/BRP based on that assessment.
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19. Corrected LRW in Appendix D to read $10 - 10^7$ versus the current value of $10 - 10^6$ (AR-2015-18334)

a. Editorial, typo from S2015-01-15-01

20. Changed SRC (Susquehanna Review Committee) to NSRB (Nuclear Safety Review Board)

a. Editorial

21. Revised EPlan to align with the security plan for the definition of Protected Area (AR-2015-28187)

- a. Specifically made the following changes:

PROTECTED AREA – An area encompassed by Physical Barriers and to which access is controlled. ~~the area within the station inner security fence (PROTECTED AREA Barrier) designated to implement the requirements of 10 CFR 73.~~

22. Revised Appendix A to state “These agreements have been established to assure all parties are aware of their commitment to SSES and the public in the vicinity of the SSES during an emergency including a HOSTILE ACTION event.” ‘including a HOSTILE ACTION event’ was added to the sentence. (AR-2014-11179)

23. Updated signed CNO Letter to include TALEN Energy letterhead (AR-2015-02601)

- a. Editorial, reference S2015-01-29-01

24. Revised Appendix J to show Appendix D, Enclosure 5 fulfills NUREG 0654 Section II.C.3. Updated Appendix D, Enclosure 5 to clearly state the laboratories that SSES uses and their capabilities. (ACT-39-CR-2015-11640)

- a. Specifically added the following:

* Near-Site Radiation Chemistry Laboratory; used for effluent, reactor coolant and primary containment sample analysis

Capabilities:

(1) Gamma Spectrum Analysis: 25-50 samples per 24 hour day; samples may be in the form of water, air (filters/charcoal cartridges and gas marinelli beakers) and other free-flowing liquids.

(2) Liquid Scintillation Analysis: 25 samples per 24 hour day; samples in liquid form.

Equipment:

(1) Intrinsic germanium detector with associated electronics and computer system.

(2) Liquid scintillation detectors.

** Off-site Environmental Contractor (Teledyne Brown Engineering, Inc.); used for post-accident environmental samples

Location: Knoxville, TN.

Capabilities:

- (1) Gamma Spectrum Analysis: 50 samples per 24 hour day; samples may be in the form of food, milk, water, air filters and charcoal cartridges.
- (2) Gross Alpha/Beta Analysis: 50 samples per 24 hour day; samples may be in the form of air filters and water.

Equipment:

- (1) Intrinsic germanium detector with associated electronics and computer system.
- (2) Liquid scintillation detectors.
- (3) Gas proportional detector.

Response Time:

- (1) During normal hours staff existing at facility.
- (2) During off normal hours two hours following notification.

25. Updated Appendix J, Section J.10.a to also include Chapter 7, Section 7.3.1.4 & Figure 8.1 as meeting the NUREG 0654 requirement. (ACT-45-CR-2015-11640)

a. Specifically made the following change

10.a.	Appendix C, Position Specific Instructions for: <ul style="list-style-type: none">• HP Tech I (OSCAR)• Field Team Director• Monitoring Team• Environmental Sampling Team Appendix G Appendix H Chapter 7, Section 7.3.1.4 & Figure 8.1
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Attachment B, 10CFR50.54q Evaluation Checklist

Evaluation Number: E2015-12-10-01 Rev 1	Screen Number: S2015-12-10-01 Rev 1
Part I. Description of Proposed Change (Copy applicable information from 50.54(q) screen form Part I or attach a mark-up of the existing text with the proposed change can be used as an alternative):	
See attached for part I.	
Part II. Evaluation of the Proposed Change for Compliance with the requirements of 10 CFR 50.47(b) and 10 CFR 50 Appendix E:	
See attached for part II.	
Part III. Review of Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments:	
See attached for part III	
Part IV. Evaluation of the Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions:	
None of the proposed changes from section I, II, & III. negatively impact the effectiveness of the Emergency Plan Functions.	
Part V. Evaluation Conclusion Answer the following questions about the proposed change.	
1. Does the proposed change comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Does the proposed change maintain the effectiveness of the Emergency Plan (i.e., no reduction in effectiveness)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. Does the proposed change constitute an emergency action level scheme change?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If questions 1 or 2 are answered NO, or question 3 answered YES, obtain prior NRC approval under provisions of 10 CFR 50.90. If questions 1 and 2 are answered YES, and question 3 answered NO, implement applicable change process(es).	
Part VI. Signatures:	
Jacob Garcia	
Preparer Name (Print) (JFG EP109)	<div style="display: flex; justify-content: space-between;"> <div>Preparer Signature</div> <div>Date</div> </div>
JOE METEER	<div style="display: flex; justify-content: space-between;"> <div>Reviewer Signature</div> <div>Date</div> </div>
Reviewer Name (Print) (JFG EP109)	

EP Rev 59 revision details for, S2014-12-10-01 and E2014-12-10-01 Part I, Rev 1:

1. Revision 59 of the Emergency Plan is taking credit for the 2016 annual review of the Emergency Plan.
 - a. Administrative, No 54.54Q Evaluation Required
2. Added additional EP Implementing Procedures, EP Administrative procedure, in addition to EP Position Specific (EP-PS) procedures (that were already present) to Appendix C (ACT-46-CR-2015-11640)
 - a. Specifically added the below

OTHER EMERGENCY PLAN RESPONSE PROCEDURES	
Emergency Telephone Instructions and Directory	Susquehanna Offsite Organization Response to Plant Events
Remote Assembly Area Contamination Control	Termination and Restoration
Brief Non-Technical Description of EALs	EAL Classification Bases
SSES MIDAS-NU User Manual	Personnel Accountability

3. Added the following to the RM responsibilities in section 6.3.1.1 "Authorize issuance of Radioprotective Drugs in accordance with prescribed procedures. This should include consultation with the Dose Assessment Supervisor and medical consultants." To align with ED responsibilities in 6.2.1. (Comment from a RPC)
4. Added "or Control Room" in section 6.0 and 6.3 when discussing the EOF is required to activate following a SAE or GE and take over the management of the emergency regardless if the TSC or Control Room is in control. (Comment from the EP manager)
 - a. Specifically modified the following sentences:

6.0 "The EOF is required to activate following a Site Area Emergency or General Emergency classification and take over management of the emergency from the TSC or Control Room within 90 minutes of the Site Area Emergency or higher classification."

6.3 "The EOF is required to activate following a Site Area Emergency or General Emergency classification for the purpose of taking over management of the emergency from the TSC or Control Room within 90 minutes of the Site Area Emergency or higher classification."
5. Appendix A, Changed the Manager of EP is responsible for reviewing letters of agreement every two years to 'yearly' and added LOAs are to be completed annually to Section 9.2.1. (DI-2015-20163)

- a. Specifically modified the following sentences: "The Manager Emergency Preparedness is responsible for renewing letters of agreement every ~~two~~ years where applicable. In some instances, where the letter of agreement is for a specified duration longer than 12 years, letters need not be renewed until the end of the specified duration."
 - b. For Section 9.2.1 Added "Annual review of Letters of Agreement" under SSES Emergency Plan.
6. Added language to describe the Alternate OSC and TSC at the EOF in Section 8.2
 - a. Specifically added the following:
 - 8.2.3 Alternate Operations Support Center (OSC)

The alternate OSC is accessible even if the site is under threat of or experiencing hostile action since it is located within the Emergency Operations Facility. It functions as a staging area for OSC staff and has the capability for communication with the emergency operations facility, control room, and plant security. The alternate OSC provides the OSC staff with the capability for damage control team planning and preparation when the primary OSC and backup OSC cannot be safely accessed during hostile action.
 - 8.2.4 Alternate Technical Support Center (TSC)

The alternate TSC is accessible even if the site is under threat of or experiencing hostile action since it is located within the Emergency Operations Facility. It functions as a staging area for TSC staff and has the capability for communication with the emergency operations facility, control room, and plant security. The alternate TSC provides the TSC staff with the capability to perform offsite notifications and for engineering assessment activities when the primary TSC cannot be safely accessed during hostile action.
7. Changed EP from meaning Emergency Plan to meaning Emergency Preparedness in Section 2.0
 - a. Editorial
8. Changed ANS tone alerting from 3-5 to just 3 minutes in Section 8.5 to match the approved FEMA design report for SSES. (Comment from ANS owner)
 - a. Specifically modified the following sentence: "The Nuclear Emergency Alert signal is a ~~steady~~ 3 5 minute steady tone.
9. Corrected typographical error on table 6.1 in regards to when the EPlan and NRC communicators are required. Added NRC Comm and EPlan Comm as required for TSC activation in Figure 6.2. Updated Figure 6.7 Offsite Communications to clearly show which is NRC and which is EPlan Communicator. Removed EOF Communicator from the NRC side.

10. Corrected incorrect reference to Figure 6.3 in Table 6.1 to Figure 6.4 and changed the # footnote to state "2 are dispatched from the vicinity of the plant within 60 minutes" to match PLA-5589. (ACT-01-CR-2015-07468)
 - a. Specifically made the following changes: Radiological monitoring team personnel (see Figure 6.43) 2 are dispatched from the vicinity of the plant at within 60 minutes
11. Updated Appendix J Section J to include Security Coordinator, Control Room Emergency Director and TSC Emergency Director Position. Updated 7.3 Protective Actions: second sentence add after SSES Exclusion Area and Site Boundary. Third sentence remove the words SSES Exclusion Area and replace them with Site Boundary. Clarified the definition of On-Site to be "the area within the PROTECTED AREA". Updated 7.3.1.4 by replacing "within the SSES Exclusion Area" with "on-site". (CR-2015-26179)

Specifically made the following changes:

- a. Section 7.3 Protective actions are implemented to prevent or mitigate consequences to individuals during or after a radiological incident. Protective action recommendations within the SSES Exclusion Area and Site Boundary are the responsibility of the ED, but may include assistance by the EOF. Protective actions outside the ~~SSES Exclusion Area~~ Site Boundary are primarily the responsibility of State and local emergency organizations, but may include coordination of activities, dissemination of appropriate data, and recommendations by the ED or Recovery Manager
- b. Definition of ON SITE – ~~the area with the EXCLUSION AREA boundary~~ the area within the PROTECTED AREA
- c. A Site Evacuation requires that all individuals ~~within the SSES Exclusion Area~~ on-site, except for Control Room operations personnel and others with specific emergency assignments, leave the site
- d. Appendix J

J. Protective Response	
1.a., b., c., d.	Chapter 7, Section 7.3, 7.3.1, 7.3.2 Appendix C, Position Specific Instruction for: <ul style="list-style-type: none"> • Control Room Emergency Plan Communicator • TSC Emergency Plan Communicator • Radiation Protection Coordinator • Security Coordinator • Control Room Emergency Director • TSC Emergency Director

12. Revised 7.3.1.3 to include direction for when accountability is performed after a rapid evacuation by now stating "For certain security related events, an evacuation of non-essential personnel may be conducted prior to performing

accountability. Security will collect badges upon egress from the site and then perform accountability.” (ACT-37-CR-2015-11640)

13. Revised Section 9.2.1 to include the regulatory requirement for when the ETE shall be updated by adding “Perform an annual review of the Evacuation Time Estimate (ETE) to ensure 10CFR50 Appendix E Section IV and NUREG 0654 Element J.8 requirements are maintained. Update the full ETE should the criteria from Appendix E be met and re-submit the ETE to the NRC.” (ACT-48- CR-2015-11640)
14. Added non-delegable duties to the ED and RM in sections 6.2.1 and 6.3.1.1 to state “Classification of EALs, Notification of EALs and Protective Action Recommendations” (ACT-38-CR-2015-11640)
 - a. Specifically added the following for 6.2.1: “The Shift Manager assumes the role of Emergency Director (ED) until he is relieved by a qualified Emergency Director or a qualified Recovery Manager (RM). Non-delegable duties (duties the ED cannot delegate except to another qualified ED or RM) are duties related to classification of emergencies, decision to notify state and local agencies, and Protective Action Recommendations.”
 - b. Specifically added the following for 6.3.1.1: “Non-delegable duties (duties the RM cannot delegate except to another qualified ED or RM) are duties related to classification of emergencies, decision to notify state and local agencies, and Protective Action Recommendations.”
15. Corrected Attachment J Section H number 2 from 8.2.2 to 8.1.2.2. (AR-2015-19300)

- a. Editorial

16. Added RM and Dose Assessment Personnel to Table 9.1. (DI-2015-20156)

- a. Specifically added the following:

2. Personnel responsible for accident assessment/ management	Emergency Director; Emergency Coordinators, Recovery Manager, Dose Assessment Personnel	Initial training: EP and EP PSs. Retraining: Applicable EP PSs and changes. Frequency: Annual
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17. Revised Table 7.3 to state under section A.c. "Evacuate 2 mile radius, if NOT previously recommended" and to state "If the state has informed SSES of impediments to evacuation recommend shelter in place instead of evacuate."
(AR-2015-19129)

a. Specifically made the following changes:

A. Airborne Release (Cont'd)	Determine the following:	<p>3. If RPSA or HAB conditions do not apply, or for all other General Emergencies, ERO shall consider the following subsequent PARs based on dose assessment results or changes in wind direction affecting new sectors, if conditions exist which would require classification of a General Emergency per EALs:</p> <ul style="list-style-type: none"> a. Evacuate additional affected sectors 2-5 miles downwind b. Evacuate all sectors where PAGs were exceeded or are projected to be exceeded c. Evacuate 2 mile radius, IF <u>NOT</u> previously recommended <p>3.1. When there is a Controlled Containment Venting of less than an hour AND a valid dose assessment projects doses less than 1000 mrem TEDE and less than 5000 mrem Adult Thyroid CDE at EPB AND the PAR is issued by extended ERO (TSC or EOF):</p> <ul style="list-style-type: none"> a. Shelter additional affected sectors 2-5 miles downwind <p>If the state has informed SSES of impediments to evacuation, recommend shelter "in place" instead of "evacuate".</p> <p>The PAR methodology described above complies with 10CFR50.47(b)(10), Appendix E to Part 50, Section IV Paragraph 3 and NUREG-0654, Supplement 3, Rev 1.</p>
1. General Public (Cont'd)	<p>3. Weather Conditions, effect effect on dose projections.</p> <p>4. Dose projections and avoided dose.</p>	

18. Updated Table 7.3 section B language to change Quantity to Volume and to add diluted sum (Comment from a DASU)

a. Specifically made the following change:

<p>B. Liquid Radioactive Release Into Susquehanna River</p>	<ol style="list-style-type: none"> 1. Determine the following: <ol style="list-style-type: none"> a. Source of release b. Quantity Volume (approx.) of release c. Anticipated length of time release will continue 2. Notify: <ol style="list-style-type: none"> a. DEP/BRP b. Danville Water authority c. NRC 3. Initiate sampling of: <ol style="list-style-type: none"> a. Release point b. Susquehanna River 4. Initiate projections of radionuclide activity concentrations at the Danville Water Authority. 	<p>If the equivalent of an EC fraction of 0.85 is exceeded at Danville where an EC (effluent concentration) is the radionuclide specific concentration value from Column 2 of Table 2 of Appendix B to 10CFR20. A single isotope exceeds its specific effluent concentration (EC) value from Column 2 of Table 2 of Appendix B to 10CFR20 or diluted sum of EC fractions at Danville is greater than 0.85.</p>	<ol style="list-style-type: none"> 1. Recommend to DEP/BRP that consideration be given to termination of user intake of all downstream users. 2. Assess additional results of sampling and analyses of radionuclide activity concentrations of SSES liquid effluent and/or Susquehanna River water upstream of the Danville Water Authority, and provide appropriate updated recommendations to DEP/BRP based on that assessment.
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19. Corrected LRW in Appendix D to read $10 - 10^7$ versus the current value of $10 - 10^6$ (AR-2015-18334)

a. Editorial, typo from S2015-01-15-01

20. Changed SRC (Susquehanna Review Committee) to NSRB (Nuclear Safety Review Board)

a. Editorial

21. Revised EPlan to align with the security plan for the definition of Protected Area (AR-2015-28187)

- a. Specifically made the following changes:

PROTECTED AREA – An area encompassed by Physical Barriers and to which access is controlled. ~~the area within the station inner security fence (PROTECTED AREA Barrier) designated to implement the requirements of 10 CFR 73.~~

22. Revised Appendix A to state "These agreements have been established to assure all parties are aware of their commitment to SSES and the public in the vicinity of the SSES during an emergency including a HOSTILE ACTION event." 'including a HOSTILE ACTION event' was added to the sentence. (AR-2014-11179)

23. Updated signed CNO Letter to include TALEN Energy letterhead (AR-2015-02601)

- a. Editorial, reference S2015-01-29-01

24. Revised Appendix J to show Appendix D, Enclosure 5 fulfills NUREG 0654 Section II.C.3. Updated Appendix D, Enclosure 5 to clearly state the laboratories that SSES uses and their capabilities. (ACT-39-CR-2015-11640)

- a. Specifically added the following:

* Near-Site Radiation Chemistry Laboratory; used for effluent, reactor coolant and primary containment sample analysis

Capabilities:

(1) Gamma Spectrum Analysis: 25-50 samples per 24 hour day; samples may be in the form of water, air (filters/charcoal cartridges and gas marinelli beakers) and other free-flowing liquids.

(2) Liquid Scintillation Analysis: 25 samples per 24 hour day; samples in liquid form.

Equipment:

(1) Intrinsic germanium detector with associated electronics and computer system.

(2) Liquid scintillation detectors.

** Off-site Environmental Contractor (Teledyne Brown Engineering, Inc.); used for post-accident environmental samples

Location: Knoxville, TN.

Capabilities:

- (1) Gamma Spectrum Analysis: 50 samples per 24 hour day; samples may be in the form of food, milk, water, air filters and charcoal cartridges.
- (2) Gross Alpha/Beta Analysis: 50 samples per 24 hour day; samples may be in the form of air filters and water.

Equipment:

- (1) Intrinsic germanium detector with associated electronics and computer system.
- (2) Liquid scintillation detectors.
- (3) Gas proportional detector.

Response Time:

- (1) During normal hours staff existing at facility.
- (2) During off normal hours two hours following notification.

25. Updated Appendix J, Section J.10.a to also include Chapter 7, Section 7.3.1.4 & Figure 8.1 as meeting the NUREG 0654 requirement. (ACT-45-CR-2015-11640)

a. Specifically made the following change

10.a.	Appendix C, Position Specific Instructions for: <ul style="list-style-type: none">• HP Tech I (OSCAR)• Field Team Director• Monitoring Team• Environmental Sampling Team Appendix G Appendix H Chapter 7, Section 7.3.1.4 & Figure 8.1
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E2015-12-10-01 Part II

1. Administrative, No Evaluation Required.

2. The regulation in 10 CFR 50.47(b)(16) states the following:

Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.

Adding EP Implementing Procedures, EP Administrative procedures, in addition to EP Position Specific (EP-PS) procedures (that were already issued and evaluated under the 10CFR50.54q process) to Appendix C of the Emergency Plan is in compliance with the above regulation.

Appendix E to 10 CFR Part 50 does not contain any supporting requirements.

3. The regulation in 10 CFR 50.47(b)(10) states the following:

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. Evacuation time estimates have been developed by applicants and licensees. Licensees shall update the evacuation time estimates on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

10CFR50 Appendix E IV.B.

The means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety. The emergency action levels shall be based on in-plant conditions and instrumentation in addition to onsite and offsite monitoring.

Adding the capability of the Recovery Manager (RM) to authorize issuing KI is in accordance with the above regulation since that position is equivalent in authority to the Emergency Director (ED).

4. The regulation in 10 CFR 50.47(b)(2) states the following:

On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.

10CFR50 Appendix E IV.E.8.d.

For nuclear power reactor licensees, an alternative facility (or facilities) that would be accessible even if the site is under threat of or experiencing hostile action, to function as a staging area for augmentation of emergency response staff and collectively having the following characteristics: the capability for communication with the emergency operations facility, control room, and plant security; the capability to perform offsite notifications; and the capability for engineering assessment activities, including damage control team planning and preparation; for use when onsite emergency facilities cannot be safely accessed during hostile action;

Allowance for the Emergency Operations Facility (EOF) to also accept Command and Control directly from the Control Room (CR) and not just the Technical Support Center (TSC) in certain security related events is in accordance with Emergency Plan definition # 96 for the TSC and its associated footnote, page 59 footnote and page 107 footnote and is in compliance with the above regulation.

5. The regulation in 10 CFR 50.47(b)(16) states the following:

Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.

Changing that the Manager of EP is responsible for reviewing letters of agreement from every two years to 'yearly' and adding LOAs are to be completed annually is more conservative than the current language and is in compliance with the above regulation.

Appendix E to 10 CFR Part 50 does not contain any supporting requirements.

6. The regulation in 10 CFR 50.47(b)(8) states the following:

Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

10CFR50 Appendix E IV.E.8.d

For nuclear power reactor licensees, an alternative facility (or facilities) that would be accessible even if the site is under threat of or experiencing hostile action, to function as a staging area for augmentation of emergency response staff and collectively having the following characteristics: the capability for communication with the emergency operations facility, control room, and plant security; the capability to perform offsite notifications; and the capability for engineering assessment activities, including damage control team planning and preparation, for use when onsite emergency facilities cannot be safely accessed during hostile action.

Adding language to the Emergency Plan to describe the physical capabilities of the Alternate OSC and Alternate TSC is in compliance with the above regulations.

7. Editorial, No Evaluation Required.

8. The regulation in 10 CFR 50.47(b)(5) states the following:

Procedures have been established for notification, by the licensee, of State and local response organizations and for notification of emergency personnel by all organizations; the content of initial and follow-up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.

10CFR50 Appendix E IV.D.1 and IV.D.3

Administrative and physical means for notifying local, State, and Federal officials and agencies and agreements reached with these officials and agencies for the prompt notification of the public and for public evacuation or other protective measures, should they become necessary, shall be described. This description shall include identification of the appropriate officials, by title and agency, of the State and local government agencies within the EPZs.

A licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency. The licensee shall demonstrate that the appropriate governmental authorities have the capability to make a public alerting and notification decision promptly on being informed by the licensee of an emergency condition. Prior to initial operation greater than 5 percent of rated thermal power of the first reactor at a site, each nuclear power reactor licensee shall demonstrate that administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway EPZ. The design objective of the prompt public alert and notification system shall be to have the capability to essentially complete the initial alerting and initiate notification of the public within the plume exposure pathway EPZ within about 15

minutes. The use of this alerting and notification capability will range from immediate alerting and notification of the public (within 15 minutes of the time that State and local officials are notified that a situation exists requiring urgent action) to the more likely events where there is substantial time available for the appropriate governmental authorities to make a judgment whether or not to activate the public alert and notification system. The alerting and notification capability shall additionally include administrative and physical means for a backup method of public alerting and notification capable of being used in the event the primary method of alerting and notification is unavailable during an emergency to alert or notify all or portions of the plume exposure pathway EPZ population. The backup method shall have the capability to alert and notify the public within the plume exposure pathway EPZ, but does not need to meet the 15-minute design objective for the primary prompt public alert and notification system. When there is a decision to activate the alert and notification system, the appropriate governmental authorities will determine whether to activate the entire alert and notification system simultaneously or in a graduated or staged manner. The responsibility for activating such a public alert and notification system shall remain with the appropriate governmental authorities.

Changing that the ANS tone alert signal is 3 minute steady tone from a steady 3-5 minute tone to match the approved FEMA design report is in compliance with the above regulations.

9. Administrative. The original change to Table 6.1 that describes a TSC Eplan Communicator and a TSC NRC Communicator vs. two TSC Communicators is found in Emergency Plan revision 58 and was evaluated in E2014-06-19-03. This change to Table 6.1 corrects a vertical alignment error that occurred in revision 58. The values in the TSC column needed moved down one row. The update to Figure 6.2 and 6.7 is administrative to make it congruent with Table 6.1. No addition evaluation required.

10. The regulation in 10 CFR 50.47(b)(2) states the following:

On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.

10CFR50 Appendix E IV.C. Activation of Emergency Organization

1. The entire spectrum of emergency conditions that involve the alerting or activating of progressively larger segments of the total emergency organization shall be described. The communication steps to be taken to alert or activate emergency personnel under each class of

emergency shall be described. Emergency action levels (based not only on onsite and offsite radiation monitoring information but also on readings from a number of sensors that indicate a potential emergency, such as the pressure in containment and the response of the Emergency Core Cooling System) for notification of offsite agencies shall be described. The existence, but not the details, of a message authentication scheme shall be noted for such agencies. The emergency classes defined shall include: (1) Notification of unusual events, (2) alert, (3) site area emergency, and (4) general emergency. These classes are further discussed in NUREG-0654/FEMA-REP-1.

2. By June 20, 2012, nuclear power reactor licensees shall establish and maintain the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an emergency action level has been exceeded and shall promptly declare the emergency condition as soon as possible following identification of the appropriate emergency classification level. Licensees shall not construe these criteria as a grace period to attempt to restore plant conditions to avoid declaring an emergency action due to an emergency action level that has been exceeded. Licensees shall not construe these criteria as preventing implementation of response actions deemed by the licensee to be necessary to protect public health and safety provided that any delay in declaration does not deny the State and local authorities the opportunity to implement measures necessary to protect the public health and safety

Changing the figure reference is editorial to correct an obvious typographical error. Changing the footnote to read 2 are dispatched from the vicinity of the plant within 60 minutes from 'at 60 minutes' to match what was submitted to the NRC in PLA-5589 is in compliance with the above regulation.

11. The regulation in 10 CFR 50.47(b)(10) states the following:

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. Evacuation time estimates have been developed by applicants and licensees. Licensees shall update the evacuation time estimates on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

10CFR50 Appendix E IV.B.

The means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action

levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety. The emergency action levels shall be based on in-plant conditions and instrumentation in addition to onsite and offsite monitoring.

Adding the Emergency Director (ED) has responsibility for protective actions of personnel within the plant Exclusion Area and Site Boundary (i.e. property controlled by SSES) is in compliance with the above regulation since protective actions outside the Site Boundary are primarily the responsibility of State and local emergency organizations once a GE and PAR have been communicated.

The definition of ON-SITE was changed from Exclusion Area to the area within the Protected Area since the Protected Area is used for personnel accountability. The change is in compliance with the above regulation since ON-SITE is contained within the Site Boundary (as does the Exclusion Area) and remains within the protective action recommendations required by section 7.3 of the emergency plan.

Adding additional positions that are responsible for protective actions within the Site Boundary to Appendix J in the EPlan is in compliance with the above regulation.

12. The regulation in 10 CFR 50.47(b)(10) states the following:

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. Evacuation time estimates have been developed by applicants and licensees. Licensees shall update the evacuation time estimates on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

10CFR50 Appendix E IV.B.

By June 20, 2012, for nuclear power reactor licensees, these action levels must include hostile action that may adversely affect the nuclear power plant. The initial emergency action levels shall be discussed and agreed on by the applicant or licensee and state and local governmental authorities, and approved by the NRC. Thereafter, emergency action levels shall be reviewed with the State and local governmental authorities on an annual basis.

Adding that security will collect badges upon egress from the site and then perform accountability (reference SI-SO-008) for those instances when site evacuation is need prior to conducting normal

accountability (security event) is in compliance with the above regulation since it ensures protective actions of on-site personnel.

13. The regulation in 10 CFR 50.47(b)(10) states the following:

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. Evacuation time estimates have been developed by applicants and licensees. Licensees shall update the evacuation time estimates on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

10CFR50 Appendix E IV.5 and IV.6:

During the years between decennial censuses, nuclear power reactor licensees shall estimate EPZ permanent resident population changes once a year, but no later than 365 days from the date of the previous estimate, using the most recent U.S. Census Bureau annual resident population estimate and State/local government population data, if available. These licensees shall maintain these estimates so that they are available for NRC inspection during the period between decennial censuses and shall submit these estimates to the NRC with any updated ETE analysis.

If at any time during the decennial period, the EPZ permanent resident population increases such that it causes the longest ETE value for the 2-mile zone or 5-mile zone, including all affected Emergency Response Planning Areas, or for the entire 10-mile EPZ to increase by 25 percent or 30 minutes, whichever is less, from the nuclear power reactor licensee's currently NRC approved or updated ETE, the licensee shall update the ETE analysis to reflect the impact of that population increase. The licensee shall submit the updated ETE analysis to the NRC under § 50.4 no later than 365 days after the licensee's determination that the criteria for updating the ETE have been met and at least 180 days before using it to form protective action recommendations and providing it to State and local governmental authorities for use in developing offsite protective action strategies.

Adding direction to perform an annual review of the ETE in accordance with the applicable portions of 10CFR50 Appendix E IV and NUREG 0654 ensures compliance with the above regulations.

14. The regulation in 10 CFR 50.47(b)(2) states the following:

On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is

maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.

10CFR50 Appendix E IV.A.2

A description of the onsite emergency response organization (ERO) with a detailed discussion of:

- a. Authorities, responsibilities, and duties of the individual(s) who will take charge during an emergency;
- b. Plant staff emergency assignments;
- c. Authorities, responsibilities, and duties of an onsite emergency coordinator who shall be in charge of the exchange of information with offsite authorities responsible for coordinating and implementing offsite emergency measures.

Adding the ED and RM responsibilities that may not be delegated to meet the requirements in NUREG 0654 Section II.B.4 ensures compliance with the above regulations.

15. Editorial, No Evaluation Required.

16. The regulation in 10 CFR 50.47(b)(15) states the following:

Radiological emergency response training is provided to those who may be called on to assist in an emergency.

10CFR50 Appendix E IV.F.1

The program to provide for: (a) The training of employees and exercising, by periodic drills, of emergency plans to ensure that employees of the licensee are familiar with their specific emergency response duties, and (b) The participation in the training and drills by other persons whose assistance may be needed in the event of a radiological emergency shall be described. This shall include a description of specialized initial training and periodic retraining programs to be provided to each of the following categories of emergency personnel:

- i. Directors and/or coordinators of the plant emergency organization;
- ii. Personnel responsible for accident assessment, including control room shift personnel;
- iii. Radiological monitoring teams;
- iv. Fire control teams (fire brigades);

- v. Repair and damage control teams;
- vi. First aid and rescue teams;
- vii. Medical support personnel;
- viii. Licensee's headquarters support personnel;
- ix. Security personnel.

Adding the RM and Dose Assessment personnel to the table that delineates training of SSES Emergency Response Personnel (personnel responsible for accident assessment/management) is in compliance with the above regulations.

17. The changes to Table 7.3 for the airborne release PAR is evaluated in E2014-10-29-01 revision 3.

18. The regulation in 10 CFR 50.47(b)(9) states the following:

Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

The regulation in 10 CFR 50.47(b)(10) states the following:

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. Evacuation time estimates have been developed by applicants and licensees. Licensees shall update the evacuation time estimates on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

10CFR50 Appendix E IV.B.

The means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety. The

emergency action levels shall be based on in-plant conditions and instrumentation in addition to onsite and offsite monitoring.

10CFR50 Appendix E IV.E.2.

Equipment for determining the magnitude of and for continuously assessing the impact of the release of radioactive materials to the environment.

The changes to Table 7.3 for the liquid release PAR are grammatical in nature for enhanced readability and do not constitute a technical change. Therefore the changes remain in compliance with the above regulations.

19. Editorial for previous typographical error. See S2015-01-5-01. No additional Evaluation Required.

20. Editorial, No Evaluation Required.

21. The regulation in 10 CFR 50.47(b)(16) states the following:

Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.

The change to the definition of PROTECTED AREA is to match what is in the Physical Security Plan and does not constitute a technical change. There is no practical difference from an Emergency Plan implementation standpoint. The area encompassed is the same. Therefore the changes remain in compliance with the above regulations.

Appendix E to 10 CFR Part 50 does not contain any supporting requirements.

22. The regulation in 10 CFR 50.47(b)(3) states the following:

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

10CFR50 Appendix E IV.A.7.

By June 23, 2014, identification of, and a description of the assistance expected from, appropriate State, local, and Federal agencies with responsibilities for coping with emergencies, including hostile action at the site. For purposes of this appendix, "hostile action" is defined as an act directed toward a nuclear power plant or its personnel that includes the use of violent force to destroy equipment, take hostages, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, projectiles, vehicles, or other devices used to deliver destructive force.

Adding that LOA's have been established during all emergencies 'including a HOSTILE ACTION event' is in compliance with the above regulations. Details of how the above are accomplished are found in EP-00-002 and AR-1066721.

23. Changing the letterhead for the annual CNO letter is editorial. No Evaluation is required. Reference E2015-01-29-01 for transition from PPL to Talen.

24. The regulation in 10 CFR 50.47(b)(3) states the following:

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

10CFR50 Appendix E IV.A.6.

A description of the local offsite services to be provided in support of the licensee's emergency organization.

Adding the capabilities the analytical facilities listed in Enclosure 5 to Appendix and their expected availability to provide radiological monitoring and analyses services which can be used in an emergency is in compliance with the above regulations. Updating Appendix J to show Appendix D, Enclosure 5 fulfills NUREG 0654 Section II.C.3 is also in compliance with the above regulations.

25. The regulation in 10 CFR 50.47(b)(10) states the following:

A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. Evacuation time estimates have been developed by applicants and licensees. Licensees shall update the evacuation time estimates on a periodic

basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

Adding the “roadmap” to additional sections of the Emergency Plan that comply with NUREG-0654 section II.J.10.a is in compliance with the above regulation. No technical content change.

No corresponding requirements in 10CFR50 Appendix E.

E2015-12-10-01 Part III

1. Administrative, No Evaluation Required.

2. Two emergency planning functions have been defined for planning standard 16:

- (1) Responsibility for emergency plan development and review is established.
- (2) Planners responsible for emergency plan development and maintenance are properly trained.

The applicable planning element from NUREG-0654 is II.P.7 - Each plan shall contain as an appendix listing, by title, procedures required to implement the plan. The listing shall include the section(s) of the plan to be implemented by each procedure.

There are no additional commitments associated with this section of the emergency plan.

Adding EP procedures does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because it completes the list of procedures required by NUREG-0654.

3. Four emergency planning functions have been defined for planning standard 10:

- (1) A range of public PARs is available for implementation during emergencies.
- (2) Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.
- (3) A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.
- (4) KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public.

The applicable planning element from NUREG-0654 is II.J.6 - Each licensee shall, for individuals remaining or arriving onsite during the emergency, make provisions for:

- a. Individual respiratory protection;
- b. Use of protective clothing; and
- c. Use of radioprotective drugs, (e.g., individual thyroid protection).

There are no additional commitments associated with this section of the emergency plan.

The provisions in NSIR/DPR-ISG-01 section IV.F are not applicable to this change.

Adding the capability of the Recovery Manager (RM) to authorize issuing KI does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because that position is equivalent in authority to the Emergency Director (ED) and ensures use the appropriate use of KI no matter which facility has command and control.

4. Two emergency planning functions have been defined for planning standard 2:

(1) The process ensures that onshift emergency response responsibilities are staffed and assigned.

(2) The process for timely augmentation of onshift staff is established and maintained.

The applicable planning element from NUREG-0654 is II.B.3 - Each licensee shall identify a line of succession for the emergency coordinator position and identify the specific conditions for higher level utility officials assuming this function.

There are no additional commitments associated with this section of the emergency plan.

The provisions in NSIR/DPR-ISG-01 section IV.D are applicable to this change.

Allowance for the Emergency Operations Facility (EOF) to also accept Command and Control directly from the Control Room (CR) and not just the Technical Support Center (TSC) in certain security related events does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because it allows the EOF to relieve the control room of specific emergency plan responsibilities to focus on emergency mitigation for those instances when the TSC is not able to activate in 60 minutes. The change is in accordance with Emergency Plan definition # 96 for the TSC and its associated footnote, page 59 footnote and page 107 footnote and is in compliance with the NSIR/DPR-ISG-01 section IV.D.

5. Two emergency planning functions have been defined for planning standard 16:

(1) Responsibility for emergency plan development and review is established.

(2) Planners responsible for emergency plan development and maintenance are properly trained.

The applicable planning element from NUREG-0654 is II.P.4 - Each organization shall update its plan and agreements as needed, review and certify it to be current on an annual basis. The update shall take into account changes identified by drills and exercises.

There are no additional commitments associated with this section of the emergency plan.

Changing that the Manager of EP is responsible for reviewing letters of agreement from every two years to 'yearly' and adding LOAs are to be completed annually does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because it is more conservative than the current language and is in compliance with the above NUREG planning element.

6. Two emergency planning functions have been defined for planning standard 8:

- (1) Adequate facilities are maintained to support emergency response.
- (2) Adequate equipment is maintained to support emergency response.

The applicable planning element from NUREG-0654 is II.H – Facilities and Equipment

There are no additional commitments associated with this section of the emergency plan.

The provisions in NSIR/DPR-ISG-01 section IV.D for communications, notifications and assessment activities are applicable to this change.

Adding language to the Emergency Plan to describe the physical capabilities of the Alternate OSC and Alternate TSC does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because it is in compliance with the above NSIR/DPR-ISG-01 section IV.D requirements.

7. Editorial, No Evaluation Required.

8. Three emergency planning functions have been defined for planning standard 5:

- (1) Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes after declaration of an emergency and providing follow-up notifications.
- (2) Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway.

(3) The public ANS meets the design requirements of FEMA-REP-10, "Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants", or is compliant with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter.

The applicable planning element from NUREG-0654 is Appendix 3.C.3.g – The siren signal shall be a 3 to 5 minute steady signal as described in Paragraph IV E of CPG-1-17 and capable of repetition.

The FEMA-approved ANS design report is the licensing basis for Sirens for SSES.

There are no additional commitments associated with this section of the emergency plan.

The provisions in NSIR/DPR-ISG-01 section IV.J for backup ANS means are not applicable to this change.

Changing that the ANS tone alert signal is 3 minute steady tone from a steady 3-5 minute tone does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because it remains within the band described in the NUREG and it matches the approved FEMA design report.

9. Administrative. The original change to Table 6.1 that describes a TSC Eplan Communicator and a TSC NRC Communicator vs. two TSC Communicators is found in Emergency Plan revision 58 and was evaluated in E2014-06-19-03. This change to Table 6.1 corrects a vertical alignment error that occurred in revision 58. The values in the TSC column needed moved down one row. The update to Figure 6.2 and 6.7 is administrative to make it congruent with Table 6.1. No addition evaluation required.

10. Two emergency planning functions have been defined for planning standard 2:

(1) The process ensures that onshift emergency response responsibilities are staffed and assigned.

(2) The process for timely augmentation of onshift staff is established and maintained.

The applicable planning element from NUREG-0654 is II.B - Onsite Emergency Organization Table B-1.

There are no additional commitments associated with this section of the emergency plan.

Changing the figure reference is editorial to correct an obvious typographical error. Changing the footnote to read 2 are dispatched from the vicinity of the plant within 60 minutes from 'at 60 minutes' does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because it matches what was submitted to the NRC in PLA-5589.

11. Four emergency planning functions have been defined for planning standard 10:

- (1) A range of public PARs is available for implementation during emergencies.**
- (2) Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.**
- (3) A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.**
- (4) KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public.**

The applicable planning element from NUREG-0654 is II.J.1 - Each licensee shall establish the means and time required to warn or advise onsite individuals and individuals who may be in areas controlled by the operator, including:

- a. Employees not having emergency assignments;
- b. Visitors;
- c. Contractor and construction personnel; and
- d. Other persons who may be in the public access areas on or passing through the site or within the owner controlled area.

The provisions in NSIR/DPR-ISG-01 section IV.F protective actions for onsite personnel during hostile action.

Adding the Emergency Director (ED) has responsibility for protective actions of personnel within the plant Exclusion Area and Site Boundary (i.e. property controlled by SSES) does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because protective actions outside the Site Boundary are primarily the responsibility of State and local emergency organizations once a GE and PAR have been communicated and the site boundary is what was originally approved by the NRC in Revision 6 section 6.4 of the Emergency Plan.

The definition of ON-SITE was changed from Exclusion Area to the area within the Protected Area since the Protected Area is used for personnel accountability. The change does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because ON-SITE is contained within the Site Boundary (as does the Exclusion Area) and remains within the protective action recommendations required by section 7.3 of the emergency plan.

Adding additional positions that are responsible for protective actions within the Site Boundary to Appendix J in the EPlan does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because they ensure compliance with NUREG-0654 is II.J.1 .

The provisions in NSIR/DPR-ISG-01 section IV.F are affected by these changes since ON-000-010 is the decision making tool to aid the shift manager in rapidly determining the best protective action for onsite personnel during hostile action and these changes do not affect ON-000-010.

12. Four emergency planning functions have been defined for planning standard 10:

- (1) A range of public PARs is available for implementation during emergencies.**
- (2) Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.**
- (3) A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.**
- (4) KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public.**

The applicable planning element from NUREG-0654 is II.J.5 – Each licensee shall provide for a capability to account for all individuals onsite at the time of the emergency and ascertain the names of missing individuals within 30 minutes of the start of an emergency and account for all onsite individuals continuously thereafter.

The provisions in NSIR/DPR-ISG-01 section IV.F protective actions for onsite personnel during hostile action.

There are no additional commitments associated with this section of the emergency plan.

Adding that security will collect badges upon egress from the site and then perform accountability (reference SI-SO-008) for those instances when site evacuation is need prior to conducting normal accountability (security event) does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because it ensures protective actions of on-site personnel.

13. Four emergency planning functions have been defined for planning standard 10:

- (1) A range of public PARs is available for implementation during emergencies.
- (2) Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.
- (3) A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.
- (4) KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public.

The applicable planning element from NUREG-0654 is II.J.8 – Each licensee's plan shall contain time estimates for evacuation within the plume exposure EPZ.

There are no additional commitments associated with this section of the emergency plan.

Adding direction to perform an annual review of the ETE in accordance with the applicable portions of 10CFR50 Appendix E IV does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because ensures compliance with them.

14. Two emergency planning functions have been defined for planning standard 2:

- (1) The process ensures that onshift emergency response responsibilities are staffed and assigned.
- (2) The process for timely augmentation of onshift staff is established and maintained.

The applicable planning element from NUREG-0654 is II.B.4 – Each licensee shall establish the functional responsibilities assigned to the emergency coordinator and shall clearly specify which responsibilities may not be delegated to other elements of the emergency organization. Among the responsibilities which may not be delegated shall be the decision to notify and to recommend protective actions to authorities responsible for offsite emergency measures.

The provisions in NSIR/DPR-ISG-01 section IV.F are not applicable to this change.

There are no additional commitments associated with this section of the emergency plan.

Adding the ED and RM responsibilities that may not be delegated to meet the requirements in NUREG 0654 Section II.B.4 does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because ensures compliance with the above.

15. Editorial, No Evaluation Required.

16. One emergency planning function has been defined for planning standard 15:

(1) Training is provided to emergency responders.

The applicable planning element from NUREG-0654 is II.O.5 - Each organization shall provide for the initial and annual retraining of personnel with emergency response responsibilities

There are no additional commitments associated with this section of the emergency plan

Adding the RM and Dose Assessment personnel to the table that delineates training of SSES Emergency Response Personnel (personnel responsible for accident assessment/management) does not negatively affect Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments because it meets the planning standard and planning element.

17. The changes to Table 7.3 for the airborne release PAR is evaluated in E2014-10-29-01 revision 3.

18. The changes to Table 7.3 for the liquid release PAR are grammatical in nature for enhanced readability and do not constitute a technical change.

19. Editorial for previous typographical error. See S2015-01-5-01. No additional Evaluation Required.

20. Editorial, No Evaluation Required.

21. The change to the definition of PROTECTED AREA is to match what is in the Physical Security Plan and does not constitute a technical change. There is no practical difference from an Emergency Plan implementation standpoint. The area encompassed is the same.

22. Two emergency planning functions have been defined for planning standard 3:

- (1) Arrangements for requesting and using offsite assistance have been made.
- (2) State and local staff can be accommodated at the EOF in accordance with the emergency plan..

The applicable planning element from NUREG-0654 is II.C - Emergency Response Support and Resources,

The provisions in NSIR/DPR-ISG-01 section IV.E to verify that adequate ORO resources have been identified to support onsite response activities during an emergency at the site, including hostile action are applicable to this change.

The provisions in NSIR/DPR-ISG-01 section IV.K that licensee plans and procedures should establish the protocols and interfaces that will allow OROs to effectively support onsite activities, consistent with incident command concepts established in State and local emergency response plans are applicable to this change.

There are no additional commitments associated with this section of the emergency plan

Adding that LOA's have been established during all emergencies 'including a HOSTILE ACTION event' is in compliance with the above. Details of how the above are accomplished are found in EP-00-002 and AR-1066721.

23. Changing the letterhead for the annual CNO letter is editorial. No Evaluation is required. Reference E2015-01-29-01 for transition from PPL to Talen.

24. Two emergency planning functions have been defined for planning standard 3:

- (1) Arrangements for requesting and using offsite assistance have been made.
- (2) State and local staff can be accommodated at the EOF in accordance with the emergency plan..

The applicable planning element from NUREG-0654 is II.C.3 - Each organization shall identify radiological laboratories and their general capabilities and expected availability to provide radiological monitoring and analyses services which can be used in an emergency.

There are no additional commitments associated with this section of the emergency plan

Adding the capabilities the analytical facilities listed in Enclosure 5 to Appendix and their expected availability to provide radiological monitoring and analyses services which can be used in an emergency is in compliance with the planning functions and planning element. Updating Appendix J to show Appendix D, Enclosure 5 fulfills NUREG 0654 Section II.C.3 is also in compliance with the planning functions and planning element.

25. Four emergency planning functions have been defined for planning standard 10:

- (1) A range of public PARs is available for implementation during emergencies.
- (2) Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities.
- (3) A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events.
- (4) KI is available for implementation as a protective action recommendation in those jurisdictions that chose to provide KI to the public.

The applicable planning element from NUREG-0654 is II.J.10.a – The organization’s plans to implement protective measures for the plume exposure pathway shall include:

Maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas; (identification of radiological sampling and monitoring points shall include the designators in Table J-1 or an equivalent uniform system described in the plan)

There are no additional commitments associated with this section of the emergency plan.

Adding the “roadmap” to additional sections of the Emergency Plan that comply with NUREG-0654 section II.J.10.a is in compliance with the above planning element. No technical content change to the Emergency Plan.

Attachment B, 10CFR50.54q Evaluation Checklist

Evaluation Number: E2014-10-29-01 Rev. 3	Screen Number: S2014-10-09-01
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Part I. Description of Proposed Change:

This 10CFR50.54(q) evaluation is a revision of the evaluation performed under E2014-10-29-01 Rev. 2 on implementing a new SSES PAR scheme developed in accordance with NUREG-0654, Supplement 3, Rev. 1. The new PAR scheme was implemented on 12/19/14 and included issuance of multiple implementing procedures, as indicated below, and Rev 56 of the SSES Emergency Plan.

As indicated in AR-2015-19129, minor discrepancies were noted between the PAR scheme and the PAR description in the SSES Emergency Plan, Rev 56. These corrections are considered for implementation in Rev. 59 of the SSES Emergency plan and the 10CFR50.54(q) evaluation in E2014-10-29-01 Rev. 2 is updated to address these minor changes in the SSES Emergency Plan. All changes from Rev 2 are highlighted in yellow in this revision.

PPL Susquehanna developed a new PAR scheme (see Attachment 1 in this document) in accordance with NUREG-0654, Supplement 3 and NEI 12-10 guidance. The new SSES PAR scheme is based on Evacuation Time Estimates (ETE) (see Appendix G of SSES Emergency Plan, Rev 55) and NEI 12-10, Appendix A (see Attachment 2 in this document) that was developed and agreed upon with Pa State representatives. The new PAR scheme affected the following code and procedure changes (see Attachment 3 for a detailed description of the procedure changes):

1. Changed MIDAS-NU code to report sectors and distances where Protective Action Guidelines (PAGs) (1000 mrem TEDE and 5000 mrem child Thyroid CDE) were exceeded.
2. EP-RM-005 (editorial)
3. EP-PS-001, Attachment MM, Protective Action Recommendation (PAR) Determination (Attachment 1 in this document)
4. EP-PS-001, Attachment NN, Protective Action Recommendation State Notification Form (Attachment 4 in this document)
5. EP-PS-101 (editorial)
6. EP-PS-104 (editorial)
7. EP-PS-105 (editorial)
8. EP-PS-200 (editorial)
9. EP-PS-244 (editorial)
10. EP-PS-245 (editorial)
11. EP-PS-307 (editorial)

ACT-01-CR-2014-31605 that evaluated the changes to the SSES Emergency Plan, Rev 55 (E-Plan) as a result of implementing NUREG-0654, Supplement 3 (changes 1 through 4 above) showed that only Table 7.3 needs to be changed in the E-Plan. The following E-Plan changes are proposed and evaluated in this document for Table 7.3, First Row (A.1), Last Column:

"SSES will provide an initial PAR to the Senior State Official within 15 minutes from the declaration of a General Emergency as follows:

1. For a Rapidly Progressing Severe Accident (RPSA):
 - a. Evacuate 2 mile radius;
 - b. Evacuate affected sectors 2-10 miles downwind.
2. For a Hostile Action Based (HAB) GE event:
 - a. Shelter 5 mile radius.
3. For all other General Emergencies:
 - a. Evacuate 2 mile radius;
 - b. Evacuate affected sectors 2-5 miles downwind.
 - 3.1 When there is a Controlled Containment Venting of less than an hour AND a valid dose assessment projects doses less than 1000 mrem TEDE and less than 5000 mrem Adult Thyroid CDE at EPB AND the PAR is issued by extended ERO (TSC or EOF):
 - a. Shelter 2 mile radius;
 - b. Shelter affected sectors 2-5 miles downwind.

Initial PAR shall also advise citizens to take KI in accordance with the state's emergency plan and advise remainder of the EPZ to monitor and prepare.

Continue assessment based on available plant and field monitoring information and evaluate for subsequent PARs in accordance with:

1. Until RPSA conditions do not apply any more, ERO shall consider the following subsequent PARs based on dose assessment results or changes in wind direction affecting new sectors, if conditions exist which would require classification of a General Emergency per EALs:

- a. Evacuate additional affected sectors 2-10 miles downwind.
- b. Evacuate all sectors where PAGs were exceeded or are expected to be exceeded.

2. Until HAB conditions do not apply any more, ERO shall consider the following subsequent PARs based on dose assessment results:

- a. Evacuate 2 mile radius
- b. Evacuate all sectors where PAGs were exceeded.

3. If RPSA or HAB conditions do not apply, or for all other General Emergencies, ERO shall consider the following subsequent PARs based on dose assessment results or changes in wind direction affecting new sectors, if conditions exist which would require classification of a General Emergency per EALs:

- a. Evacuate additional affected sectors 2-5 miles downwind.
- b. Evacuate all sectors where PAGs were exceeded or are projected to be exceeded.
- c. Evacuate 2 mile radius, IF NOT previously recommended

3.1 When there is a Controlled Containment Venting of less than an hour AND a valid dose assessment projects doses less than 1000 mrem TEDE and less than 5000 mrem Adult Thyroid CDE at EPB AND the PAR is issued by extended ERO (TSC or EOF):

- a. Shelter additional affected sectors 2-5 miles downwind.

If the state has informed SSES of impediments to evacuation, recommend shelter "in place" instead of "evacuate".

The PAR methodology described above complies with 10CFR50.47(b)(10), Appendix E to Part 50, Section IV Paragraph 3 and NUREG-0654, Supplement 3, Rev 1."

Statement 3.c (highlighted above) was added to address those scenarios in which the initial PAR is "Sheltering" and a subsequent PAR analysis reveals that an "Evacuation" is required. It was implemented in the new PAR scheme (Attachment 1) rollout but was not included in the Rev 56 E-Plan language.

The second highlighted statement in the E-Plan language was included in the clarifying notes of the new PAR scheme (Attachment 1) rollout but was inadvertently omitted from Rev 56 E-Plan language. Per analysis in AR-2015-19129 these two statements are considered for Rev 59 of the E-Plan.

In addition:

- The footnotes associated with First Row (A.1), Last Column were deleted.
- The last row (C) in Table 7.3 was deleted.

The changes proposed above are aligned with changes in EP-PS-001, Attachment MM, Protective Action Recommendation (PAR) Determination, and EP-PS-001, Attachment NN, Protective Action Recommendation State Notification Form, which were developed in accordance with NUREG-0654, Supplement 3 and NEI 12-10 guidance. The MIDAS-NU code changes were performed to enhance and support the SSES ERO to issue the initial and subsequent PARs.

The rest of the changes above (see Changes 5 through 11 in Part I) are editorial in nature and are not analyzed in this evaluation. They include addition of "initial" to the step in the procedure to perform the first PAR after GE or addition of steps in procedure to perform subsequent PARs in accordance with EP-PS-001, Protective Action Recommendation (PAR) Determination chart.

Part II. Review of Emergency Planning Functions, Elements, and Commitments affected by the Proposed Change and the Licensing Basis for those Functions, Elements, and Commitments:

10CFR50.47(b)(9) requires use of adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition. 10CFR50.47(b)(10) requires licensees to develop a range of Protective Actions for the plume exposure pathway EPZ for the emergency workers and public. 10CFR50.47(b)(15) requires licensees to ensure that radiological emergency response training is provided to Emergency Response Organization (ERO).

To comply with 10CFR50.47(b)(10), ACT-01-CR-2014-31605 evaluated the changes to the SSES Emergency Plan, Rev 55 (E-Plan) as a result of implementing NUREG-0654, Supplement 3. The analysis showed that only Table 7.3 needs to be changed in the E-Plan. The proposed E-Plan changes for Table 7.3 are shown in Part I. In addition, the following supporting procedures were changed to comply with 10CFR50.47(b)(10) and to implement NUREG-0654, Supplement 3: Protective Action Recommendation (PAR) Determination and Protective Action Recommendation State Notification Form in EP-PS-001 procedure.

To comply with 10CFR50.47(b)(10), Appendix E to Part 50, Section IV Paragraph 3, requires licensees to use NRC-approved ETE and updates to ETE in the formulation of PARs.

To comply with 10CFR50.47(b)(9), Section 5 (Emergency Conditions), Section 6 (Organizational Control of the Emergencies), Section 7 (Emergency Measures), and Appendix B (Wind Roses, Dose/Distance Plots, and Joint Frequency Distribution) in the E-Plan describe PPL Susquehanna, LLC's commitments with regards to dose assessment software / hardware. Section 5 shows that the results of the dose assessment calculations may be used to enter the Emergency Plan (reference Emergency Action Level RG1 and RS1). Section 7.1 (Assessment Actions for all Emergency Classifications) describes the various aspects of dose assessment. Specifically in Section 7.1.1.3 (Dose Calculations for Airborne Releases) the E-Plan states that a dose calculation model is used to make current, site specific estimates and predictions of atmospheric effluent transport and diffusion during and immediately following an accidental airborne radioactivity release, for the purpose of providing an input to the assessment of the consequences of accidental radioactive releases to the atmosphere and to aid in the implementation of emergency response decisions. Emergency Plan Appendix B states that the dose/distance plots have been removed and reference use of MIDAS as the approved methodology/tool for determining the magnitude of and for continually assessing the impact of the release.

The responsibility for dose assessments resides in Chapter 6 and is reiterated in Chapter 7 of the E-Plan. The responsibility for dose assessment is not being changed by updating the MIDAS software / hardware.

As part of complying with 10CFR50.47(b)(15), Section 9.1.1.c and Table 9.1 in the E-Plan describe the need for specialized retraining for emergency personnel when there are changes in their responsibilities or methods.

In addition, applicable sections in RG 1.219 were also reviewed for compliance.

Besides changes in Table 7.3 of the E-Plan, the 10CFR50.54(q) screening S2014-10-09-01 indicated that 10CFR50.45(b)(9), 10CFR50.47(b)(10) and 10CFR50.47(b)(15) planning standards are potentially affected by the change described in Part I.

Part III. Evaluation of the Proposed Change for Compliance with the requirements of 10 CFR 50.47(b) and 10 CFR 50 Appendix E:

10CFR50.47(b)(10) requires licensees to ensure that *"A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. Evacuation time estimates have been developed by applicants and licensees. Licensees shall update the evacuation time estimates on a periodic basis. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed."* In addition, Appendix E to Part 50, Section IV Paragraph 3, requires licensees to *"use NRC approved evacuation time estimates (ETEs) and updates to the ETEs in the formulation of protective action recommendations."*

Protective Action Recommendation (PAR) Determination (Attachment 1 in this evaluation) and Protective Action Recommendation State Notification Form (Attachment 4 in this evaluation) in EP-PS-001 procedure (see changes 3 and 4 in Part I) were changed based on the following documents:

- NUREG 0654, Supplement 3, Rev 1;
- NEI/NRC EPFAQ 2013-004;
- NEI 12-10, Rev 1;
- NEI 12-10, Rev 1, Attachment A for SSES, developed and agreed upon with Pa State representatives (Attachment 2 in this evaluation).

These changes were performed to comply with the requirements of 10CFR50.47(b)(10) and Appendix E to Part 50, Section IV, Paragraph 3.

10CFR50.47(b)(9) requires licensees to ensure that *"adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use"*. MIDAS-NU dose assessment code was enhanced to report sectors and distances where PAGs are exceeded in support of the implementation of the new PAR flowchart (see Change 1 in Part I). In addition, EP-RM-005, SSES MIDAS-NU User Manual, and several other procedures (EP-PS104, EP-PS-105, EP-PS-244 and EP-PS-245) were changed to reflect the new functionality of the code. The code and the procedure changes are enhancements to the dose assessment methodology and therefore, these changes maintain compliance with 10CFR50.47(b)(9).

10CFR50.47(b)(15) requires licensees to ensure that *"Radiological emergency response training is provided to those who may be called on to assist in an emergency"*. A training needs analysis was performed and training materials were developed to train the affected responders. The procedures will be issued after all training and remediation, if necessary, are completed. Therefore, by providing training on all these changes, SSES continues to comply with the requirements of 10CFR50.47(b)(15).

The following sections of RG 1.219 were also reviewed and the changes discussed in Part I do not conflict with the guidance in this document: Sections 1.2, 1.4, 3.6.d, 3.7.b, 4.5.f(2), 4.9.c(1)(a) and 4.10.

Part IV. Evaluation of the Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions:

As discussed in Parts I and III, Changes 1, 2 and 5 through 11 represent either enhancements to the current dose assessment methodology in support of implementing the new PAR flowchart or editorial changes to supporting procedures. Therefore, by implementing these changes the E-Plan effectiveness is expected to improve.

The deletion of the last row (C) in Table 7.3 was necessary to align the new PAR methodology developed in accordance with NUREG0654, Supplement 3, Rev 1, NEI 12-10 and the SSES and State of Pa agreed upon PAR basis (see Attachment 1, 2, and 4 in this document). For the airborne releases, the PARs in the last row in Table 7.3 is not aligned with the new PAR scheme (see Changes 3 and 4 described in Part I and Attachments 1 and 4 in this document), while the PARs in the last row in Table 7.3 is not appropriate. For liquid releases, the appropriate PAR for the SSES is providing to the offsite authorities is to divert the Danville drinking water supply from the Susquehanna river, if appropriate (see row B in Table 7.3 in E-Plan and Attachment 4 in this document). The footnotes associated with First Row (A.1), Last Column were deleted since they are no longer applicable to the new PAR methodology described in Part I of this evaluation.

Changes 3, 4 and the rest of E-Plan change (first row (A.1) and last column in Table 7.3) discussed in Parts I and III may represent a challenge to the ERO proficiency because they replace a few PARs and a relative simple 1-page PAR flowchart with multiple PARs, based on various plant condition, and a relatively more complex, 4-page PAR flowchart. However, the E-Plan effectiveness will not be affected by implementing these changes because:

- Although SSES is replacing a 1-page PAR flowchart with a 4-page PAR flowchart, the new flowchart is designed such that the user is **at all times on only one page** when assessing PARs.
- Every page in the new flowchart is comparable in complexity, if not simpler, than the current 1-page flowchart.
- Training for the key responders will provide the necessary knowledge to successfully implement the new PAR flowchart.
- Exercises and tabletops will further allow the key responders to gain necessary experience with the new PAR flowchart implementation.

Therefore, it is concluded that, by implementing Changes 3 and 4 discussed in Parts I and III, the E-Plan effectiveness is expected to remain the same.

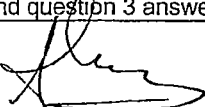
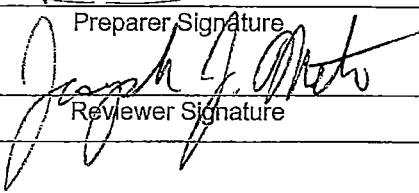
Part V. Evaluation Conclusion

Answer the following questions about the proposed change.

1. Does the proposed change comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Does the proposed change maintain the effectiveness of the Emergency Plan (i.e., no reduction in effectiveness)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. Does the proposed change constitute an emergency action level scheme change?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If questions 1 or 2 are answered NO, or question 3 answered YES, obtain prior NRC approval under provisions of 10 CFR 50.90. If questions 1 and 2 are answered YES, and question 3 answered NO, implement applicable change process(es).

Part VI. Signatures:

Adrian Miron		1/6/16 AM
Preparer Name (Print)	Preparer Signature	Date
Joe Meter		1/7/16
Reviewer Name (Print)	Reviewer Signature	Date

EMERGENCY PLANNING FORMS AND SUPPLEMENTARY INSTRUCTIONS

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For Information Only

PROTECTIVE ACTION RECOMMENDATION (PAR) DETERMINATION

Page 1
INITIAL PAR ONLY

Is Classification a GE?

Is this the INITIAL PAR?

GO TO:

- Page 2 for all other General Emergency Declarations
- Page 3 for Rapidly Progressing Severe Accidents (RPSA)
- Page 4 for Hostile Action Based (HAB) Events

AND FOLLOW the instructions on each page. DO NOT RETURN to this page.

Is this a RPSA? (SEE NOTE 1)
1. Loss of Primary Containment per the EALs AND
2. a. CHRM GREATER THAN 40,000 R/hr (20% clad damage and leakage in primary containment) OR
b. Any Initiating conditions for EAL RG1 have been met or are projected to be met within an hour?

Is there a Hostile Action Based / Security CR Event in Progress (including concurrent EALs)?

Is this PAR from Control Room?

Is Controlled Containment Venting with a duration LESS THAN 1 hour in progress or projected via EP-DS-904?

Valid dose projections of LESS THAN 1000 mrem TEDI AND LESS THAN 5000 mrem Adult Thyroid CDE at EPB?

(See Note 2)

1. Evacuate 2 mile Radius
2. Evacuate affected sectors 2 - 10 miles downwind (Table 1)

CONTINUE to evaluate Entry Conditions on Page 3. DO NOT RETURN to this page.

Shelter 5 Mile Radius

CONTINUE to evaluate Entry Conditions on Page 4. DO NOT RETURN to this page.

(See Note 2)

1. Evacuate 2 mile Radius
2. Evacuate affected sectors 2 - 5 miles downwind (Table 1)

CONTINUE to evaluate Entry Conditions on Page 2. DO NOT RETURN to this page.

(See Note 2)

1. Shelter 2 mile Radius
2. Shelter affected sectors 2 - 5 miles downwind (Table 1)

CONTINUE to evaluate Entry Conditions on Page 2. DO NOT RETURN to this page.

Table 1

Wind Direction From	Affected Sectors
350° to 011°	SSB / S / SSW
011° to 034°	S / SSW / SW
034° to 059°	SSW / SW / WSW
059° to 079°	SW / WSW / W
079° to 101°	WSW / W / WNW
101° to 124°	W / WNW / NNW
124° to 149°	WNW / NNW / NNW
149° to 169°	NNW / NNW / N
169° to 191°	NNW / N / NNE
191° to 214°	N / NNE / NE
214° to 237°	NNE / NE / ENE
237° to 259°	NE / ENE / E
259° to 281°	ENE / E / ESE
281° to 304°	E / ESE / SE
304° to 327°	ESE / SE / SSE
327° to 349°	SE / SSE / S

Protective Action Recommendation Tracking

Mark Affected Areas and Current Wind Direction from ____.

E = Evacuate
S = Shelter

Clarifying Notes:

- IF the conditions for a Rapidly Progressing Severe Accident (RPSA) cannot be immediately confirmed, THEN ANSWER No.
- IF the State has informed SSES of impediments to evacuation, THEN
 - RECOMMEND Shelter instead of Evacuate for any affected area.
 - KEEP TRACK of Initial PAR using the chart at right
 - When the State informs the impediment is removed, RECOMMEND Evacuation again, if applicable at that time (CONTINUE to Page 2 or 3 entry points AND DO NOT RETURN to this page)

Entry Points For Subsequent PARs

GE Terminated or Downgraded per EP-00-003

Changes in wind direction affecting new downwind sectors (Table A)

Dose Assessment Results for Actual Release Exceed or Are Projected to Exceed PAGs (Note 2)

Flowchart:

```

graph TD
    A[GE Terminated or Downgraded per EP-00-003] --> C[Exit This Procedure]
    B[Changes in wind direction affecting new downwind sectors Table A] --> D{Do conditions currently exist which would require the classification of a General Emergency per the EALs?}
    E[Dose Assessment Results for Actual Release Exceed or Are Projected to Exceed PAGs Note 2] --> F[1. Evacuate additional affected sectors 2 - 5 mile downwind Table A]
    F --> G[2. Evacuate all sectors where PAGs were exceeded or are projected to be exceeded Note 2]
    G --> H[3. Evacuate 2 mile radius, IF NOT previously recommended]
    H --> I[CONTINUE to Evaluate Entry Conditions on this page.]
    I --> B
    D -- No --> C
    D -- Yes --> J{Is This PAR from Control Room?}
    J -- Yes --> F
    J -- No --> K{Is Controlled Containment Venting with a duration LESS THAN 1 hour in EP-DS-004 in progress?}
    K -- No --> C
    K -- Yes --> L{Valid dose projections of LESS THAN 1000 mrem TDE AND LESS THAN 5000 mrem Adult Thyroid CDE at EPB?}
    L -- No --> F
    L -- Yes --> M[Shelter affected sectors 2 to 5 miles downwind Table A]
    M --> I
  
```

Table A: Wind Direction From / Affected Sectors

Wind Direction From	Affected Sectors
359° to 011°	SSE / E / SSW
011° to 034°	SSE / E / SSW
034° to 057°	SSW / SW / WSW
057° to 079°	SW / WSW / W
079° to 101°	WSW / W / NNW
101° to 124°	W / NNW / NW
124° to 146°	NNW / NW / NNW
146° to 169°	NW / NNW / N
169° to 191°	NNW / N / NNE
191° to 214°	N / NNE / NE
214° to 237°	NNE / NE / ENE
237° to 259°	NE / ENE / E
259° to 281°	ENE / E / ESE
281° to 304°	E / ESE / SE
304° to 326°	ESE / SE / SSE
326° to 349°	SE / SSE / S

Protective Action Recommendation Tracking

Mark Affected Areas and Current Wind Direction from ____°

E = Evacuate
S = Shelter

Clarifying Notes:

- If the state has informed SSES of impediments to evacuation, THEN:
 - RECOMMEND Shelter instead of Evacuate for any newly affected area
 - MAINTAIN sheltering for all currently sheltered areas.
 - DO NOT REDUCE any previously evacuated areas to shelter.
 - KEEP TRACK of PARs using the chart at right
 - When the State informs the impediment is removed, RECOMMEND Evacuation again, if applicable at that time
- Valid dose projections of GREATER THAN OR EQUAL TO 1000 mrem TDE OR GREATER THAN OR EQUAL TO 5000 mrem Adult Thyroid CDE in any given sector in chart to the right
 - If dose projections are exceeded at a distance beyond 10 mile EPZ, COLLABORATE with the State, VALIDATE results, AND RECOMMEND Evacuation in any Sector where the PAG exceeded to nearest 5 mile increment where dose projection is less than PAGs

EMERGENCY PLANNING FORMS AND SUPPLEMENTARY INSTRUCTIONS

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Page 3
Rapidly Progressing Severe Accident ONLY

Entry Points For Subsequent PARs For RPSA

Conditions for RPSA (Note 1) Do NOT apply any more

Changes in wind direction affecting new downwind sectors (Table A)

Dose Assessment Results for Actual Release Exceed or Are Projected to Exceed PAGs (Note 3)

EXIT to Page 2
DO NOT RETURN to this Page

Do conditions currently exist which would require the classification of a General Emergency per the EALs?
No
Yes

(See Note 2)
1. Evacuate additional affected sectors 2 – 10 miles downwind (Table A)
2. Evacuate all sectors where PAGs were exceeded or are expected to be exceeded. (Note 3)

CONTINUE to Evaluate Entry Conditions on this page.

Wind Direction From	Affected Sectors
350° to 011°	SSE / S / SSW
012° to 034°	S / SSW / SW
035° to 058°	SSW / SW / WSW
059° to 079°	SW / WSW / W
080° to 101°	WSW / W / WNW
102° to 124°	W / WNW / NW
125° to 146°	WNW / NW / NNW
147° to 169°	NW / NNW / N
170° to 191°	NNW / N / NNE
192° to 214°	N / NNE / NE
215° to 237°	NNE / NE / ENE
238° to 259°	NE / ENE / E
260° to 281°	ENE / E / ESE
282° to 304°	E / ESE / SE
305° to 326°	ESE / SE / SSE
327° to 349°	SE / SSE / S

Protective Action Recommendation Tracking

Mark Affected Areas and Current Wind Direction from ____°

E = Evacuate
S = Shelter

Clarifying Notes

- a. Loss of Primary Containment per the EALs
AND
b. CHRM GREATER THAN 40,000 R/hr (this corresponds to approximately 20% fuel clad damage and leakage in primary containment)
OR
Any Initiating Condition for EAL RG1 have been met OR are projected to be met within an hour
- IF the state has informed you of impediments to evacuation, THEN:
 - RECOMMEND Shelter instead of Evacuate for any newly affected area
 - MAINTAIN sheltering for all currently sheltered areas.
 - DO NOT REDUCE any previously evacuated areas to shelter.
 - KEEP TRACK of PARs using the chart at right
 - When the State informs the impediment is removed, RECOMMEND Evacuation again, if applicable at that time
- Valid dose projections of GREATER THAN OR EQUAL TO 1000 mrem TEDE OR GREATER THAN OR EQUAL TO 5000 mrem Child Thyroid CDE in any given sector in chart to the right
 - IF dose projections are exceeded at a distance beyond 10 mile EPZ, COLLABORATE with the State, VALIDATE results, AND RECOMMEND Evacuation in any Sector where the PAG exceeded to nearest 5 mile increment where dose projection is less than PAGs

Page 4
Hostile Action Accident ONLY

Entry Points For Subsequent PARs For Hostile Action Accident

Conditions of Hostile Action Based / Security Event GE (initial or concurrent EAL) do **NOT** apply any more

Dose Assessment Results for Actual Release Exceed or Are Projected to Exceed PACs (Note 2)

(See Note 1)

1. Evacuate 2 mile radius
2. Evacuate all sectors where PACs were exceeded (Note 2)

CONTINUE to Evaluate Entry Conditions on this page.

EXIT to Page 2
DO **NOT** RETURN to this Page

Clarifying Notes:

1. IF the state has informed you of impediments to evacuation, THEN:
 - a. **RECOMMEND** Shelter instead of Evacuate for any newly affected area
 - b. **MAINTAIN** sheltering for all currently sheltered areas.
 - c. **DO NOT REDUCE** any previously evacuated areas to shelter.
 - d. **KEEP TRACK** of PARs using the chart at right
 - e. When the State informs the impediment is removed, **RECOMMEND** Evacuation again, if applicable at that time
2. Valid dose projections of **GREATER THAN OR EQUAL TO 1000 mrem TEDE** OR **GREATER THAN OR EQUAL TO 5000 mrem 5000 mrem Child Thyroid CDE** in any given sector in chart to the right

Protective Action Recommendation Tracking

Mark Affected Areas:
E = Evacuate
S = Shelter

: Attachment 2

APPENDIX A - PAR STRATEGY DEVELOPMENT/EVALUATION

(SSES)

(9/17/14)

Developer Instruction

This page provides a template for an approval chain process. Licensees may use another established approval process for this document, including those used for procedures or emergency plan review and approval.

Approved: Stan Davis (Site EP Manager)

Approved: DEP/BRP (ORO)

Approved: PEMA (ORO)

Approved: _____ (ORO)

Developer Instruction

For the General Response Questions, the left column corresponds to Supplement 3 sections 2.1-2.7. The remainder of the questions refer to the logic diagram from Supplement 3 that is reproduced as Appendix C of this document. The right hand column of the table is for ORO/licensee use in developing the final site-specific PAR procedure requirements.

GENERAL RESPONSE QUESTIONS	LICENSEE AND ORO RESPONSE
2.1: Development of Site-Specific Protective Action Recommendation and Decision Logic Question #1	
<p>Are OROs participating in the development of the protective action recommendations based on Supplement 3?</p> <p>If yes, list participating OROs. Also include ORO approval signatures on the cover sheet when this Appendix is completed.</p> <p>If no, then list documents obtained from non-participating OROs used to develop the site-specific guidance.</p>	<div data-bbox="683 825 951 857" data-label="Section-Header"><u>Developer Instruction</u></div> <p>Answer yes or no. List participating OROs, or when OROs are not participating in the PAR strategy development process, list documents obtained to develop the site-specific guidance.</p> <p>Yes. Pennsylvania Bureau of Radiation Protection; Pennsylvania Emergency Management Agency</p> <p>Date of Response: <u>4/23/14</u></p>
2.1: Development of Site-Specific Protective Action Recommendation and Decision Logic Question #2	
<p>Will separate guidance be developed for on-shift and augmented BRO?</p> <p>If yes, describe the differences.</p>	<div data-bbox="660 1421 928 1453" data-label="Section-Header"><u>Developer Instruction</u></div> <p>Answer yes or no. "N/A" may be used if appropriate. If separate guidance for control room and augmented BRO are provided, then list the differences (e.g., "control room not required to implement second stage of staged evacuation," etc.) and incorporate as applicable in the site-specific PAR procedure.</p> <p>No, one set of PAR charts for all facilities.</p> <p>Date of Response: <u>9/12/14</u></p>

GENERAL RESPONSE QUESTIONS	LICENSEE AND ORO RESPONSE
2.2: Notification of Protective Action Recommendations at a General Emergency	
Read and understand the element in Supplement 3 – no new action is needed.	N/A Note: Section 2.2 in Supplement 3 states: "The GEW notification is expected to include a PAR." SSES delivers PAR on a separate form.
2.3: Termination of Protective Actions	
Read and understand the element in Supplement 3 – no new action is needed.	N/A Termination criteria included in SSES EP-000-003 procedure.
2.4: Precautionary Protective Actions at Site Area Emergency	
<p>Do precautionary PARs prior to declaration of a General Emergency currently exist in the licensee's Emergency Plan?</p> <p>If yes, describe how they will be addressed in the site-specific PAR procedure.</p> <p>If the answer is yes, incorporate appropriate entry point(s) in the site-specific protective action strategy development tool for these precautionary PARs.</p> <p>If no, no additional action is needed.</p>	<div style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u></p> <p>Answer yes or no. If PARs prior to the General Emergency (e.g., recommendations to be provided at a Site Area Emergency) are currently used, describe how they will be addressed in the protective action strategy (e.g., retained or not retained, etc.) and how they will be incorporated into the protective action strategy as applicable (e.g., procedure note at SAE, logic diagram entry point, etc.). "N/A" may be used where there are no precautionary PARs prior to the General Emergency. Incorporate appropriate information in the site-specific PAR procedure.</p> </div> <p>No. SSES only generates PARs after a General Emergency is declared.</p> <p>Date of Response: 9/12/14</p>

GENERAL RESPONSE QUESTIONS	LICENSEE AND ORO RESPONSE
2.5: Wind Persistence Issues	
<div data-bbox="171 519 563 689" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> This question is related to Note 4 of the Supplement 3 Attachment (Note also provided in Appendix C).</p> </div> <p>Does typical site meteorology include wind direction shifts on a time scale that is shorter than the (longest) ETE for downwind 2-5 mile sectors? A wind direction shift as used here is defined as a shift that would impact another compass sector or emergency response planning area.</p> <p>If yes, consider a wind persistence study.</p>	<div data-bbox="683 519 1169 1115" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> Provide answer. Provide reference to wind persistence study as applicable. There is no intent to require licensees to conduct wind persistence studies to implement Supplement 3. No justification is required to stay within the default guidance. The guidance is permissive regarding wind persistence issues not directive. Developers may also choose to simply include reference to UFSAR information, review of historical National Weather Service (NWS) information or discussions with NWS representatives. Incorporate appropriate information in the site-specific PAR procedure.</p> </div> <p>SSES will propose to perform wind persistence studies in the next fiscal year. Meanwhile, SSES will develop the initial downwind PARs only for 3 Sectors as recommended in EPA-400 and allowed by NUREG-0654, Supplement 3. Based on the wind persistence study's conclusions, SSES would adjust the PAR procedure, if necessary.</p> <p>Date of Response: 9/17/14</p>



2.5: Size of Emergency Response Areas	
<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <u>Developer Instruction</u> This question is related to Note 4 of the Supplement 3 Attachment (Note also provided in Appendix C). </div> <p>ERPAs are typically larger than the downwind compass sectors in a PAR and may negate the need to expand the number of sectors recommended. For sites with smaller ERPAs, this item may be relevant. Licensees should defer to the ORO strategy when performing the assessment for this area.</p>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <u>Developer Instruction</u> Provide answer. Provide technical justification if an area larger than the 3 to 4 22.5 degree compass sectors will be used to define the term "downwind." If a wind persistence study or some other method was used to determine the size of the downwind area, reference it in this column. The use of entire radii, such as "5 mile radius" or "10 mile radius" to define "downwind" is not acceptable. "N/A" may be used when the site-specific use of "downwind" is the same as that found in Supplement 3. Incorporate appropriate information in the site-specific PAR procedure. </div> <p>SSES recommends PARs in sector format and does not use ERPAs.</p>
<p>Should an expanded description of "downwind" be used (e.g., greater than 3 or 4 22.5 degree compass sectors, including all of the impacted emergency response planning areas)?</p> <p>If yes, provide justification.</p> <p>If no, no additional action is needed.</p>	<p>The initial downwind PAR for the site will be based on 3 sectors until the Wind Persistence studies performed during next fiscal year direct otherwise.</p> <p>Date of Response: <u>9/17/14</u></p>
2.6: Expansion of Initial Protective Action Recommendations	
<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <u>Developer Instruction</u> This item is related to Note 11 of the Supplement 3 Attachment (Note also provided in Appendix C). </div> <p>Read and understand the element in Supplement 3 and Appendix B of this document – no new action is needed.</p>	<p>N/A</p>

GENERAL RESPONSE QUESTIONS	LICENSEE AND ORO RESPONSE
2.7: Strategy for Rapidly Progressing Scenarios	
<p>(greater than PAGs at boundary) in about an hour (Initiating Condition AG1, Release of gaseous radioactivity resulting in offsite dose greater than 1,000 mrem TEDE or 5,000 mrem thyroid CDE declared).</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • <i>If the above criteria cannot be immediately confirmed, assume a rapidly progressing severe accident is not occurring.</i> • <i>Licensees may choose to substitute a loss of core cooling with an identifiable instrumentation value such as greater than or equal to Containment HRA Potential Loss EAL Threshold (20% Clad Damage).</i> <div data-bbox="99 1336 545 1617" style="border: 1px solid black; padding: 5px; margin-top: 20px;"> <p><u>Developer Instruction</u> Extreme weather conditions or other impediments to evacuation do not need to be considered for development of the licensee's PAR strategy for rapidly progressing severe accidents.</p> </div>	<p>Note 3: The child thyroid CDE criteria may be eliminated when the new EPA PAG Manual is approved.</p> <p>Date of Response: <u>9/17/14</u></p>

GENERAL RESPONSE QUESTIONS	LICENSEE AND ORO RESPONSE
2.7: Strategy for Rapidly Progressing Scenarios	
<div data-bbox="150 506 596 704" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> This item informs on Block B of Appendix C and Note 9 of the Supplement 3 Attachment (Note also provided in Appendix C).</p> </div> <p>Define a rapidly progressing severe accident for your site. Refer to Supplement 3 Attachment, Note 1 (Note also provided in Appendix C).</p>	<div data-bbox="674 506 1191 880" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> Provide the site-specific definition for a rapidly progressing severe accident and the basis for this definition. Incorporate appropriate information in the site-specific PAR procedure. The licensee-specific definition may be used to replace the term "rapidly progressing severe accident" as it is used in Supplement 3.</p> </div>
<div data-bbox="133 917 584 1051" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> Review NRC EPFAQ 2013-004, question one before proceeding.</p> </div>	
<div data-bbox="122 1087 573 1293" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> The questions below assist with determining the site-specific definition of a rapidly progressing severe accident.</p> </div>	
<p>A rapidly progressing severe accident may be defined as:</p> <ol style="list-style-type: none"> 1. This protective action recommendation is the first after a General Emergency has been declared AND 2. There is loss of the containment barrier per the Emergency Action Levels AND 3. EITHER of the following: <ol style="list-style-type: none"> a. Greater than or equal to Containment High Range Area Radiation Monitor Potential Loss EAL Threshold (20% Clad Damage) <p>OR</p> <ol style="list-style-type: none"> b. A significant radiological release 	<p>Rapidly Progressing Severe Accident is defined as.</p> <ol style="list-style-type: none"> 1. This protective action recommendation is the first after a General Emergency has been declared AND 2. There is loss of the containment barrier per the Emergency Action Levels AND 3. EITHER of the following: <ol style="list-style-type: none"> a. Containment High Range Radiation Monitor is greater than 40,000 R/h* <p>OR</p> <ol style="list-style-type: none"> b. Initiating Dose Projection Conditions for RG1 (release of gaseous radioactivity resulting in offsite dose greater than 1,000 mrem TEDE or 5,000 mrem child thyroid CDE at EPB) is projected in about an hour. <p>* This value corresponds with a 20 % fuel clad damage and a potential loss of Primary Containment Barrier</p> <p>Note 1: the 40,000 R/h CHRM reading needs to be revalidated or adjusted per the new EAL scheme based on NEI 99-01, Rev 6.</p> <p>Note 2: RG1 may change to a different EAL designator when the new EAL scheme based on NEI 99-01, Rev 6 is implemented at SSSES.</p>

Developer Instruction

Refer to the logic diagram in Appendix C to address the rest of the questions in this Appendix.

QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
BLOCK A. General Emergency Declared	
Read and understand related element in Supplement 3 – no new action is needed unless modifications of entry conditions are required based on the response to previous question for Supplement 3 Section 2.4.	N/A
BLOCK B. Rapidly Progressing Severe Accident	
Refer to General Response Question 2.7, Strategy for Rapidly Progressing Scenario. Use the definition provided in the right hand column of Section 2.7 to replace the term “rapidly progressing severe accident” when the site-specific PAR procedure is developed.	N/A
BLOCK C. Continue Assessment	
As long as the impediment remains in place, new plant or dose assessment conditions would not result in a different PAR unless conditions in Appendix B apply.	N/A

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QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
BLOCKS D, E, and F. Impediments Question #1 (Evacuation Support)	
<p><u>Developer Instruction</u> Evacuation support not yet in place - For example, the GE is the initial notification to offsite response organizations or if there is a previous emergency classification notification, the GE notification occurs before preparations to support evacuation can be completed. Many sites have a low population density within 2 miles and evacuation support readiness may not be considered an impediment.</p>	<p><u>Developer Instruction</u> Answer yes or no. If any answers are yes, list the time required to provide the evacuation support resources (time period for the impediment) and the "clock start" for this activity (NOUE, Alert, etc.) and incorporate in the site-specific PAR procedure.</p> <p><u>Developer Instruction</u> If the ORO identified time for evacuation support preparations has elapsed because the site was in prior declaration before the GE, an initial GE declaration is not required to consider the impediment. Incorporate this information as applicable in the site-specific PAR procedure.</p>
<p>Is "evacuation support in place" considered an impediment to evacuation for your site?</p> <p>No. The state did not want the utility to include Evacuation Support as part of the PAR process.</p> <p>Is such support needed for the 2 mile radius, 5 mile downwind sectors and 10 mile downwind sectors?</p> <p>No. The state did not want the utility to include Evacuation Support as part of the PAR process.</p> <p>How long should this impediment last?</p> <p>No. The state did not want the utility to include Evacuation Support as part of the PAR process.</p> <p><input checked="" type="checkbox"/> all answers are no, no additional action is needed.</p>	<p>Describe impediment (Block D):</p> <p>N/A since all answers in Question 1 are no.</p> <p>Describe PAR (Block E):</p> <p>N/A since all answers in Question 1 are no.</p> <p>Describe duration of the impediment (Block F):</p> <p>N/A since all answers in Question 1 are no.</p> <p>Date of Response: <u>4/23/14</u></p>

QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
<p>If yes, OROs define the duration of the "evacuation support in place" impediment and the emergency classification when mobilization of evacuation support (and the clock) would start. Provide the information obtained from OROs in the right hand column.</p>	

**QUESTIONS REGARDING
SUPPLEMENT 3 PROTECTIVE ACTION
STRATEGY DEVELOPMENT TOOL
AND NOTES**

**BLOCKS D, E, and F. Impediments
Question #2 (Hostile Action)**

What is the best protective action recommendation when a declared hostile action is occurring or has occurred? Do OROs want the licensee to recommend SIP or evacuation for a hostile action event? How long should this impediment last? Note that staged evacuation may still be appropriate if evacuation is selected as the PAR.

Some examples of PARs that may be selected for hostile action events are:

- SIP 0-2 mile radius and 2-5 miles downwind
- Evacuate 0-2 mile radius and 2-5 miles downwind
- SIP 0-2 mile radius and evacuate 2-5 miles downwind

PAR strategy determined during pre-planning meeting with ORO.

Specify the selected PAR for hostile action events in the Licensee and ORO Response column.

LICENSEE AND ORO RESPONSE

Developer Instruction

Provide answers:

- SIP or evacuation
- Duration (e.g., consult with your ORO or Law Enforcement Agency (LEA) on what should be included in the site specific PAR procedure that informs when to no longer SIP).

Incorporate in the site-specific PAR procedure.

Describe hostile action as an impediment in the site-specific PAR procedure (Block D):

A hostile action event will result in a sheltering PAR to 5 miles in all directions. This allows the emergency responders free access to the site from all directions during the hostile action event.

It was decided not to use a key-hole approach for hostile actions since the downwind direction at the beginning could be any direction. This makes it harder for the responders to predict what areas within the 2 – 5 mile region will be in shelter and which will have members of the public roaming about. It also allows the OROs to implement a PAR without the need to upgrade it unless a significant release occurs resulting in dose to the public exceeding the EPA PAGs.

Describe PAR (Block E):

The initial PAR for a hostile action is to shelter a 5 mile radius

Describe duration of the impediment (Block F):

QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
	<p>The shelter PAR will remain in place until:</p> <ul style="list-style-type: none">• The State of Pa determines that the public no longer needs to shelter based on the plant conditions relative to the Hostile Action event.• The event is terminated.• The PAR can be subsequently changed to evacuate a 2 mile radius and all areas where the PAG's have been exceeded based on dose assessment results. This is done to provide a threshold where the protection of the public takes precedence over neutralizing the hostile action threat at the site. <p>Date of Response: 4/23/14</p>



QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
BLOCKS D, E, and F. Impediments Question #3 (Other)	
<div data-bbox="171 649 452 683" data-label="Section-Header"><u>Developer Instruction</u></div> <div data-bbox="168 680 649 823" data-label="Text"> <p>"Other" impediments for licensee consideration should be limited as much as possible. Consideration should be limited to weather-related impediments.</p> </div> <p>OROs may determine whether or not the licensee needs to be involved in weather-related determinations. This determination is made in advance during this assessment and not at the time of an event. During an event, licensees need only consider this contingency if they have been informed of impediments (e.g., highways closed by governor's order).</p> <p>What weather-related or additional impediments to evacuation should be considered by the licensee and the ORO? How long should this impediment last?</p> <p>If other impediments are to be considered, define the conditions in the right hand column.</p> <p>If no "other" impediments are to be considered, no additional action is needed.</p> <p><i>Note: Impediments are intended to represent the inability to evacuate a large portion of the population of a given area vs. an individual road blockage.</i></p> <p><i>Note: The consideration for impediment questions 1, 2 and 3 above may collapse into one simple guidance statement for the Control Room after consulting the OROs during PAR strategy development (e.g., SIP 0-2 mile radius and 2-5 miles downwind if a general emergency declared within 1 hour of initial</i></p>	<div data-bbox="736 649 1017 683" data-label="Section-Header"><u>Developer Instruction</u></div> <div data-bbox="731 680 1205 891" data-label="Text"> <p>Provide answers. Define all the conditions that apply, the required PAR and describe the duration of the impediment. Incorporate information as applicable in the site-specific PAR procedure.</p> <p>If no "other" impediments are to be considered, "N/A" may be placed in this column.</p> </div> <p>Describe impediment (Block D):</p> <p>Impediments to evacuation other than Hostile Action events (see BLOCKS D, E, and F. Impediments Question #2) and Containment Venting (see BLOCKS D, E, and F. Impediments Question #4) will be determined solely by the OROs (PEMA or DEP/BRP) and not by SSES. At this time, the State of PA has indicated that impediments will be for large area issues such as adverse weather. As such, when informed by the OROs that impediments to evacuation exist; the impediments will be implemented across the entire EPZ and not just a portion of the EPZ. SSES will implement impediments other than the ones listed above only if the OROs inform the utility that such impediments exist. SSES will not be required to seek out the information or make the determination than other impediments exist.</p> <p>Describe PAR (Block E):</p> <p>If the State of PA indicates that impediments exist, SSES will change any area that is indicated as Evacuate to Shelter in their PARs.</p>

QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
<p><i>classification, a Hostile Action Event is occurring, or [specific road] is closed by the State).</i></p> <p>These examples are contingent upon the ORO decision and could be removed if so agreed.</p>	<p>This applies for any new PARs once the utility is informed by the OROs. Any existing PARs will remain as previously provided to the OROs.</p> <p>Describe duration of the impediment (Block F):</p> <p>Impediments to evacuation other than a hostile action event or a containment venting at SSES will last until the OROs make the determination that such impediments no longer exist. Per Supplement 3, Page A-5 Note 8, Bullet 3: "Licensees have no responsibility for PAR modification unless a PAR change is necessary because of plant conditions or radiological assessment. OROs determine when it is safe for the public to evacuate."</p> <p>Date of Response: <u>4/23/14</u></p>

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<p>QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES</p>	<p>LICENSEE AND ORO RESPONSE</p>
<p>BLOCKS D, E, and F. Question #4 (Short Term Release)</p>	
<div data-bbox="150 655 690 778" data-label="Text"> <p><u>Developer Instruction</u> Review NRC EPFAQ 2013-004, question two before proceeding.</p> </div> <p><i>Note: Short term release considerations apply only to the augmented ERO and not to the control room strategy.</i></p> <p>Licensee may wish to consider controlled venting as a short term release scenario.</p>	<div data-bbox="728 655 1245 1129" data-label="Text"> <p><u>Developer Instruction</u> Define likely sources of short term releases.</p> <p>It is recommended that controlled venting from containment be identified as a short term release if it is considered a mitigative strategy for your reactor type.</p> <p>A PAR of SIP 2-mile radius and 5 miles downwind, all others monitor and prepare should be recommended for short term releases.</p> </div> <p>Describe venting strategy if used (Block D):</p> <p>The SSES methodology uses the following standard for a short term release.</p> <ul style="list-style-type: none"> • The release is via a Controlled direct containment vent with a duration < 1 hour • Valid dose projections > 500 mrem TEDE and < 5000 mrem TEDE and < 5000 mrem Adult CDE Thyroid at EPB* <p>* These values may change to align with current SSES EOPs. In addition, in consultation with the State of Pa, the thyroid CDE criteria may be eliminated when the new EPA PAG Manual is approved.</p> <p>These conditions must also be the first PAR after the declaration of a General Emergency since evacuation may already be implemented due to previously issued PAR's.</p> <p>If these conditions are met then the preferred</p>

QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
	<p>option is to shelter versus evacuation.</p> <p>A controlled direct containment vent of the primary containment would have to result in the initial declaration of a General Emergency and the initial PAR otherwise another PAR would have been issued which may include evacuations that are already in progress.</p> <p>Using criteria in NUREG-0654, Supplement 3, since this must be the initial PAR, the first criteria to be evaluated would be for a Rapidly Progressing Severe Accident (RPSA). See criteria for a RPSA (Question 2.7: Strategy for Rapidly Progressing Scenarios).</p> <p>Meeting the EAL RG1 Threshold for dose assessment would be controlling since the sheltering criteria for the controlled direct containment vent established with the State of Pa are that the PAGs have not been exceeded.</p> <p>If the PAG's are not exceeded, then the need to shelter or evacuate would depend on the length of the expected controlled containment venting, which must be less than 1 hour in duration.</p> <p>Another set of criteria is related to a hostile action event. Since the Hostile Action PAR is to shelter a 5 mile radius, individuals downwind would already be in the same configuration as would be set for a short term release.</p> <p>Based on this evaluation, The controlled containment venting sheltering considerations would only be applicable to a non-RPSA event and only if the release is expected to last less than 1 hour.</p> <p>Describe PAR (Block E):</p> <p>SIP 2-mile radius and 5 miles downwind</p>

QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
	Describe duration of the impediment (Block F): Approximately 1 hour. Date of Response: <u>9/17/14</u>

QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
BLOCK G. Rapidly Progressing Severe Accident PARs Question #1 (ETE for full EPZ)	
<p>Will the PARs for a rapidly progressing severe accident be different than those identified in Supplement 3 Attachment Note 9 (Note also provided in Appendix C)?</p> <p>If yes, provide justification.</p> <p>Using the ETE for the site, determine the 90 percent ETE value for the full EPZ and record it below:</p> <p>90% ETE full EPZ: <u>2:20*</u></p> <p>*Note that the larger of 2 values were used to obtain the 90% ETE value used for the comparison. The NUREG-0654, Supplement 3, guidance does not provide instructions for which ETE scenario to use for this determination. The SSES ETE report, Table 7.1 has several scenarios for different times of the year, week, day time and weather conditions. The worst conditions were not used because it would be inappropriate to base an entire PAR process on conditions that occur for a minor portion of the year.</p> <p>The 90% SSES ETE value is being compared to the table in section 2.7 of NUREG-0654, Supplement 3. That table was developed based on studies performed by the NRC. Within this regulation, it states: <i>"The analysis derived the travel speeds from current estimates for evacuating 90 percent of the general public under normal weekday conditions"</i></p> <p>As such, the Summer, Midweek, Midday, Good Weather AND Winter, Midweek, Midday, Good Weather scenarios, as defined in SSES ETE report in Table 7.1, were used.</p>	<div data-bbox="712 732 1229 938" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> If applicable, provide answer with justification as necessary and incorporate appropriate information in the site-specific PAR procedure.</p> </div> <p>See evaluation on the left side.</p> <p>Specify the 0-2 mile PAR:</p> <p>Evacuate</p> <p>Specify the 2 – 10 mile downwind PAR:</p> <p>Evacuate</p> <p>Date of Response: <u>9/15/14</u></p>



QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
<p>These conditions are going to be most typical of conditions during an event and avoid making general PAR processes on less frequent events or conditions.</p> <p>Is the 90% ETE for the full EPZ less than 3 hours?</p> <p>Yes. The ETE values used are as follows: Summer / Midweek / Midday / Good Weather: 2:20</p> <p>Winter / Midweek / Midday / Good Weather: 2:20</p> <p>If yes, than the PAR is to evacuate 2 mile radius and 2 to 10 miles down wind.</p> <p>If no, proceed to :</p> <p>BLOCK G. Rapidly Progressing Severe Accident PARs Question #2 (0-2 mile radius PAR)</p>	
<p>BLOCK G. Rapidly Progressing Severe Accident PARs Question #2 (0-2 mile radius PAR)</p> <p>Will the PARs for a rapidly progressing severe accident be different than those identified in Supplement 3 Attachment Note 9 (Note also provided in Appendix C)?</p> <p>No. See the write up in Block G Rapidly Progressing Severe Accident PAR's Question 1 for the selected scenarios from the SSES ETEs.</p> <p>See RPSA Question 1. Because 90% of the fire EPZ can be evacuated in <3 hours this questions is N/A</p>	<div data-bbox="680 1527 1209 1740" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> Provide answer with justification as necessary and incorporate appropriate information in the site-specific PAR procedure.</p> </div> <p>See evaluation on the left side.</p> <p>Specify the 0-2 mile PAR:</p> <p>Evacuate</p> <p>Date of Response: 9/15/14</p>

<p>QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES</p>	<p>LICENSEE AND ORO RESPONSE</p>
<p>If yes, provide justification. Use the worksheet below to determine PAR:</p> <p>Supplement 3 Process Worksheet: 0-2 miles Using the ETE for the site, determine the 90 percent ETE value for the 0-2 mile area. When considering day and night, select the largest value (V) in each time slot. Consider the weekday and weekend values together. Select the largest of the day and night values.</p> <p>0-2 miles: Day _____ Night _____</p> <p>Is $V \leq 2$ hours?</p> <ul style="list-style-type: none"> • If yes, evacuate 0 – 2 miles. <p>Is $V > 2$ hours?</p> <ul style="list-style-type: none"> • If yes, SIP 0 – 2 miles then evacuate 0 – 2 miles when “safer to do so”. (Refer to BLOCK J) 	

<p align="center">QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES</p>	<p align="center">LICENSEE AND ORO RESPONSE</p>
<p>BLOCK G. Rapidly Progressing Severe Accident PARs Question #3 (2-5 miles downwind PAR)</p>	
<div data-bbox="148 712 677 861" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p><u>Developer Instruction</u> Review NRC EPFAQ 2013-004, question three before proceeding.</p> </div> <p>Will the PARs for a rapidly progressing severe accident be different than those identified in Supplement 3 Attachment Note 9 (Notes also provided in Appendix C)?</p> <p>No. See RPSA Question 1. Because 90% of the entire EPZ can be evacuated in <3 hours this questions is N/A</p> <p>If yes, provide justification.</p> <p>If no, use Worksheet 1 in Appendix D, Supplemental Worksheets, to determine appropriate PARs.</p>	<div data-bbox="718 691 1247 819" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p><u>Developer Instruction</u> Provide answer with justification using Worksheet 1, Appendix D as necessary.</p> </div> <p>See evaluation on the left side.</p> <p>Specify the 2 – 5 mile down wind PARs:</p> <p>Evacuate. N/A. See RPSA Question 1.</p> <p>Date of Response: <u>9/15/14</u></p>

QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
BLOCK G. Rapidly Progressing Severe Accident PAR Question #4 (5-10 miles downwind PAR)	
<div data-bbox="145 725 662 966" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> For a rapidly progressing severe accident Supplement 3 Attachment Note 9 (Note also provided in Appendix C) requires a PAR of SIP for the 5-10 downwind sectors.</p> </div> <p>See RPSA Question 1. Because 90% of the entire EPZ can be evacuated in <3 hours this questions is N/A</p>	<div data-bbox="712 725 1212 966" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> Incorporate a SIP PAR for the 5-10 mile sectors for a rapidly progressing severe accident in the site-specific PAR procedure.</p> </div> <p>N/A</p> <p>Date of Response: <u>9/15/14</u></p>
BLOCK G. Rapidly Progressing Severe Accident PARs Question #4 (Impediments)	
<div data-bbox="145 1289 558 1598" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> Read and understand Supplement 3 Attachment Note 9 (Note also provided in Appendix C) for a discussion of impediments (extreme weather conditions, paragraph 8) during a rapidly progressing severe accident.</p> </div> <p>Will impediments be considered?</p> <p>If yes, describe the impediments and their durations in right hand column.</p> <p>If no, no additional action is needed.</p>	<div data-bbox="712 1289 1212 1698" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> Answer yes or no.</p> <p>List the impediments and durations as necessary. No justification is necessary when determining that impediments will not be considered for rapidly progressing severe accidents.</p> <p>Incorporate appropriate information in the site-specific PAR procedure.</p> </div> <p>Impediments to be considered:</p> <p>No. SSES will not consider any impediments other than Hostile Action and containment venting as part of their PAR process. In addition, the State of Pa did not want the utility to include Evacuation Support as impediment.</p>

QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
	<p>If State informs utility of other impediments, SSES will convert Evacuation into SIP and evacuation is to be recommended again, if applicable, after impediment is removed.</p> <p>Modified 0 - 2 mile PAR: N/A, see above</p> <p>Modified 2 - 5 mile downwind PAR: N/A, see above</p> <p>Date of Response: <u>9/17/14</u></p>

QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
<p data-bbox="182 637 737 674">BLOCKS H and M PARs</p> <div data-bbox="182 674 624 880"><p><u>Developer Instruction</u> Read and understand ETEs for 0-2 mile radius and 2-5 mile downwind and discuss with OROs.</p></div> <div data-bbox="182 913 624 1057"><p><u>Developer Instruction</u> Review NRC EPFAQ 2013-004, question four before proceeding.</p></div> <p data-bbox="182 1090 737 1161">Complete Worksheet 2, Appendix D to determine applicability of staged evacuation.</p>	<div data-bbox="737 674 1258 1161"><p><u>Developer Instruction</u> Complete Worksheet 2, Appendix D.</p><p data-bbox="737 791 1258 935">If the staged evacuation process as described in Supplement 3 will be used, provide the staged evacuation process in the site-specific PAR procedure.</p><p data-bbox="737 968 1258 1079">If staged evacuation will not be used, provide the appropriate PARs in the site specific PAR procedure.</p></div> <p data-bbox="737 1201 1258 1267">Worksheet 2 was completed and is included within this document.</p> <p data-bbox="737 1300 1258 1444">Staged evacuation is NOT recommended and will NOT be included in the PAR process. This is also in complete agreement with the SSBS ETE study.</p> <p data-bbox="737 1477 1258 1521">Date of Response: 9/15/14</p>

QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
<p>BLOCKS I and K. GE Conditions Remain</p> <div data-bbox="150 634 601 1017" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> Read and understand Supplement 3 Attachment Note 6 (Note also provided in Appendix C). This note refers to completion of the initial staged evacuation. This means completion of the first phase of the staged evacuation of the 2-mile radius (e.g., time to evacuate 90% of the population).</p> </div> <p><i>Note: The current GE condition could be reached through an EAL that was not the cause of the initial GE declaration, (e.g., coolant level at TAF was the basis for the initial GE and level is restored, but now the high range containment monitor is indicating a level that corresponds to a GE condition.)</i></p>	<div data-bbox="716 634 1235 1187" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> Using the considerations contained in Supplement 3 Attachment Note 6 (Note also provided in Appendix C), provide site-specific information to explain the term "GE conditions remain" and incorporate in the site-specific PAR procedure.</p> <p>If not using staged evacuation (refer to questions for BLOCKs H and M), the term "GE Conditions remain" is not required to be used. This block is not applicable and "N/A" may be placed in this column.</p> </div> <p>Staged evacuation is NOT used and therefore, this block is N/A.</p> <p>Date of Response: <u>9/15/14</u></p>

<p>QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES</p>	<p>LICENSEE AND ORO RESPONSE</p>
<p>BLOCK J. When "Safer to do so"</p>	
<div data-bbox="161 655 550 761"> <p><u>Developer Instruction</u> Review NRC EPFAQ 2013-004, question five before proceeding.</p> </div> <div data-bbox="161 829 550 1495"> <p><u>Developer Instruction</u></p> <ol style="list-style-type: none"> 1. If using separate site-specific PAR logic for the control room (e.g., a procedure or flow chart), the instructions for a rapidly progressing severe accident for the control room end at Block G. 2. It is "Safer to do so" when the augmented Emergency Response Organization (ERO) is staffed for both the licensee and OROs. No further protective actions are initiated by the control room (except for a wind shift) until the augmented ERO is present to evaluate conditions and perform assessments. </div>	<div data-bbox="723 623 1202 1070"> <p><u>Developer Instruction</u> When the augmented ERO is staffed, evacuation should be considered if the release has significantly decreased, assess the radiological conditions offsite, and (1) if the 0-2 mile radius was sheltered in place, determine if the 0-2 mile radius should remain sheltered in place or be evacuated; (2) if the 2-5 mile zones were sheltered in place, determine if they should remain sheltered in place or be evacuated; (3) determine if the 5-10 mile downwind sectors should be evacuated.</p> </div> <div data-bbox="723 1112 1202 1251"> <p>Develop guidance to aid the assessment of radiological conditions for the site and provide the guidance in the Licensee and ORO Response column.</p> </div> <div data-bbox="723 1283 1111 1357"> <p>Incorporate the guidance in the site-specific PAR procedure.</p> </div> <div data-bbox="665 1410 1210 1581"> <p>Because SSES's time to evacuate the entire HPZ is less than 3 hours (see Question 1, Block G), the initial and all subsequent PARs will be to evacuate. The considerations of "Safer to do so" do not apply for SSES.</p> </div> <div data-bbox="665 1617 1004 1651"> <p>Date of Response: 9/15/14</p> </div>

QUESTIONS REGARDING SUPPLEMENT 3 PROTECTIVE ACTION STRATEGY DEVELOPMENT TOOL AND NOTES	LICENSEE AND ORO RESPONSE
BLOCK L. Expand PAR Only to Areas Where PAGs Could be Exceeded	
Read and understand the element in Supplement 3 and the guidance in Appendix B of this document.	<div data-bbox="715 644 1257 778" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> Incorporate appropriate information in the site-specific PAR procedure.</p> </div> <p>PARs will be expanded based on dose assessment results exceeding the EPA PAGs for those sectors/areas, including beyond 10 mile EPZ PARs.</p>
BLOCK N. Continue Assessment	
Read and understand the element in Supplement 3, Attachment Note 11 and the guidance in Appendix B of this document.	<div data-bbox="715 995 1245 1129" style="border: 1px solid black; padding: 5px;"> <p><u>Developer Instruction</u> Incorporate appropriate information in the site-specific PAR procedure.</p> </div> <p>PARs will be expanded based on dose assessment results exceeding the EPA PAGs for those sectors/areas, including beyond 10 mile EPZ PARs. Assessment will continue after GE conditions do not apply any more or GE is terminated in the Intermediate/Late Phase, per SSES EP-00- 003 procedure.</p>

APPENDIX D - SUPPLEMENTAL WORKSHEETS

Worksheet 1: Block G. Rapidly Progressing Severe Accident (RPSA) PARs for the 2-5 miles downwind PAR

Because 90% of the entire EPZ can be evacuated in < 3 hours this evaluation is not required for SSES

Before proceeding review NRC EPFAQ 2013-004, question 3.

1. List each downwind zone or sector in column 1.
2. In Column 2, list the 90th percentile ETE for each 2-5 mile sector or zone.
3. Compute V:

$V = (\text{average of all ETEs that are less than 3 hours in Column 2}) \times 1.25 = \underline{\hspace{2cm}}$

OR

$V = 0$

IF all of the ETE values in Column 2 are 3 hours or greater.

4. Determine Yes(Y) or No(N) in Column 3.
5. Determine Yes(Y) or No(N) in Column 4.
6. Determine zone or sector PAR in Column 5.

Table 1. RPSA PARs for the 2-5 mile downwind zone or sectors				
Column 1	Column 2	Column 3	Column 4	Column 5
2-5 Mile Sector or Zone Impacted ¹	90 th Percentile ETE for the 2-5 Mile Sector or Zone	90 th Percentile ETE is greater than 3 hours (Y or N)	90 th Percentile ETE is greater than V (Y or N)	Sector PAR If both Column 3 and 4 are Y: Enter SIP Otherwise Enter Evacuate*

- * If the PAR is SIP then evacuate "when safer to do so."

¹ Zone Impacted is defined as the zone the wind is blowing toward when a PAR decision is made for the General

Table Justification

The goal of the above table is to simplify the PAR strategy for a RPSA where appropriate and either recommend SIP or evacuate for all zone or sector directions. NRC EPFAQ allows a 25% variance (NRC EPFAQ 2013-004) factor when determining if evacuation or SIP is appropriate. For example, assume:

- All but two zone or sector ETEs are less than 3 hours.
- Two of the zone or sector ETEs is just over 3 hours, both 3.2 hours.
- All other ETEs are the same at 2.8 hours. Therefore, following the above instructions $V = 3.5$
- Since all the ETEs are less than 3.5 then for this situation there would be only one PAR for all zones or sectors – evacuate; a simplified PAR strategy for RPSA.

Worksheet 2: Staged Evacuation

Before proceeding review NRC EPFAQ 2013-004, question 4.

Evaluation

Step 1: Impact of Staged Evacuation on the 2-Mile Zone

1. List each downwind zone or sector in column 1.
2. In Column 2, list the 90th percentile ETE for the 2 mile zone assuming concurrent evacuation of the 2 mile zone plus the downwind zone.
3. In Column 3, list the 90th percentile ETE for the 2 mile zone.
4. In Column 4, multiply the ETE in Column 3 by 1.25 (A significant change in ETE is assumed to be a 25% or greater increase).
5. Question 1: Is the time in Column 2 greater than the time in Column 4?
6. If Column 5 is answered yes then answer Column 6 yes.

Table 2*: Impact of Staged Evacuation on the 2-Mile Zone

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6
2-5 Mile Sector or Zone Impacted ²	90 th Percentile ETE for the 2 mile zone for concurrent evacuation of 2 mile zone plus the impacted zone	90 th Percentile ETE for the 2 mile zone	Column 3 x 1.25	Question 1 Column 2 > Column 4?	Staged evacuation should be utilized
R04	1:55	1:55	2:24	No	
R05	1:55	1:55	2:24	No	
R06	1:55	1:55	2:24	No	
R07	1:55	1:55	2:24	No	
R08	1:55	1:55	2:24	No	

* Column 2 values from Second Table in Table 7.3; Column 3 values from R01 entry in first Table of Table 7.1. The value selected was the greeter between Summer, Midweek, Midday, Good Weather (1) and Winter, Midweek, Midday, Good Weather (6) scenarios

² Zone Impacted is defined as the zone the wind is blowing toward when a PAR decision is made for the General Emergency. When this zone is employed this zone would SIP until 90% of the 0-2 Mile Zone is evacuated.

Evaluation

Step 2: Impact of Staged Evacuation on the 2 to 5 Mile Downwind Zone:

7. List each downwind zone or sector in column 1.
8. In Column 2, list the 90th percentile ETE for the keyhole (2 mile zone + downwind zone to 5 miles) assuming concurrent evacuation of the 2 mile zone plus the downwind zone.
9. In Column 3, list the 90th percentile ETE for the keyhole (2 mile zone + downwind zone to 5 miles) assuming staged evacuation is employed (those in the downwind zone do not begin evacuation until 90% of the 2 mile zone has evacuated).
10. In Column 4, multiply the ETE in Column 2 by 1.25 (A significant change in ETE is assumed to be 25% or greater increase).
11. If Column 3 is greater than Column 4, answer yes in Column 5 (as the 2 to 5 mile downwind zone is increased by >25% by using staged evacuation).

Table 3*. Impact of Staged Evacuation on the 2 to 5 Mile Downwind Zone				
Column 1	Column 2	Column 3	Column 4	Column 5
2-5 Mile Sector or Zone Impacted ³	90 th Percentile ETE for the Keyhole for Concurrent Evacuation	90 th Percentile ETE for Keyhole for Staged Evacuation	Column 2 x 1.25	Column 3 > Column 4?
R04	1:55	2:00	2:24	No
R05	1:55	2:05	2:24	No
R06	2:00	2:05	2:30	No
R07	2:00	2:05	2:30	No
R08	2:00	2:10	2:30	No

* Column 2 values from Second Table in Table 7.1; Column 3 values from last Table of Table 7.1. The value selected was the greater between Summer, Midweek, Midday, Good Weather (1) and Winter, Midweek, Midday, Good Weather (6) scenarios

³ Zone Impacted is defined as the zone the wind is blowing toward when a PAR decision is made for the General Emergency. It means that for this event if the wind is blowing toward this sector such that if staged evacuation is employed this zone or sector would SIP until 90% of the 0-2 Mile Zone is evacuated.

Evaluation

Step 3: Analyzing Results

There are 4 possible outcomes:

1. All rows in Column 6 of Table 2 are answered No and all rows in Column 5 of Table 3 are answered No. This indicates that staged evacuation is not beneficial to the 2-mile radius and staged evacuation does not delay those from 2 to 5 miles by more than 25%. Conclusion – STAGED EVACUATION IS NOT RECOMMENDED.
2. All rows in Column 6 of Table 2 are answered No and some or all rows in Column 5 of Table 3 are answered Yes. This indicates that staged evacuation is not beneficial to the 2-mile radius and staged evacuation does delay those from 2 to 5 miles by more than 25%. Conclusion – STAGED EVACUATION IS NOT RECOMMENDED.
3. Some rows in Column 6 of Table 2 are answered Yes and the corresponding rows (same sectors) in Column 5 of Table 3 are answered No. This indicates that staged evacuation is beneficial to the 2-mile radius and does not delay those from 2 to 5 miles by more than 25%. Conclusion – STAGED EVACUATION IS RECOMMENDED.
4. Some rows in Column 6 of Table 2 are answered Yes and the corresponding rows in Column 5 of Table 3 are answered Yes. This indicates that staged evacuation is beneficial to the 2-mile radius and staged evacuation does delay those from 2 to 5 miles by more than 25%. Conclusion – SITE SPECIFIC DOSE ASSESSMENT NEEDED to assess whether the dose benefits to the 2-mile evacuees outweigh the increased dose to those from 2 to 5 miles.

Attachment 3
Summarized Changes to Procedures

1. EP-RM-005

- Added description of Page 2 of MIDAS summary report as a result of MIDAS-NU code changes to report sectors and distances where PAGs were exceeded in Section P. [Due to PAR changes]

2. EP-PS-001

2.1 Changed Attachment MM, Protective Action Recommendation (PAR) Determination, in accordance with NUREG-0564, Supplement 3 and NEI 12-10. [Due to PAR changes]

- Changed Controlled Containment Venting criteria to align with more conservative EP-DS-004 procedure criteria until investigation by ACT-01-CR-2014-29678 is completed. [Due to PAR changes]

2.2 Changed Attachment NN, Protective Action Recommendation State Notification Form, in accordance with NUREG-0564, Supplement 3 and NEI 12-10. [Due to PAR changes]

3. EP-PS-105

3.1 Modified Steps 5.2.7 and 5.2.9 and deleted Step 5.2.8 in accordance with the new SSES PAR scheme based on NUREG-0654, Supplement 3, and NEI 12-10 and associated MIDAS code changes. [Due to PAR changes]

4. EP-PS-104

4.1 Added word "initial" in Step 5.7.2 to align with the new PAR process. [Due to PAR changes]

4.2 Modify Step 5.7.5 to align with similar steps to continue to evaluate PARs following the new PAR process. [Due to PAR changes]

5. EP-PS-244

5.1 Modified Steps 5.3.5 and 5.3.7 and deleted Step 5.3.6 in accordance with the new SSES PAR scheme based on NUREG-0654, Supplement 3, and NEI 12-10 and associated MIDAS code changes. [Due to PAR changes]

5.2 Deleted 5.3.9.b since PAR information are in the Summary Report (see Step 5.3.9.a) per MIDAS code changes [Due to PAR changes]

6. EP-PS-245

6.1 Step 5.5.2 modified to enhance statement that, following GE declaration, both initial PAR and subsequent PARs need to be continuously evaluated; [Due to PAR changes]

6.2 Added Step 5.4.5 to align with similar step in EP-PS-104 procedure.

6.3 Step 5.5.3.a(1) was modified to align with the new PAR scheme and associated MIDAS code modifications [Due to PAR changes]

6.4 Step 5.5.3.a(3)(a) deleted since does not correspond to the new PAR scheme. [Due to PAR changes]

6.5 Reference to PAR Determination flow chart was added to 5.5.5. [Due to PAR changes]

7. EP-PS-101

7.1 Added Steps 5.2.16 and 5.3.5e that directs: "Following INITIAL PAR, CONTINUE to evaluate subsequent PARs per Protective Action Recommendation Determination AND NOTIFY Senior State Official of any changes to the PAR." Added "initial" in Step 5.2.5.a and 5.3.5.d(1). [Due to PAR changes]

7.2 Added "(White Board in ED area)" to sixth and eleventh bullet in Step 5.1.8.

7.3 Changed Step 4.2.1 to "An emergency has been declared at SSES".

7.4 Added "Review and approve the ENR form" to step 5.2.3 and 5.3.4a. Changed 5.2.4 to "ENSURE ENR is transmitted within 15 minutes of Emergency Declaration, TSC and plant announcements are made, AND other concerned offsite agencies are notified." Changed 5.3.4.b to "ENSURE ENR is transmitted within 15 minutes of Emergency Declaration, TSC and plant announcements are made, AND other concerned offsite agencies are notified."

7.5 Added "as confirmed by the TSC Security Coordinator" to Steps 5.3.5b and 5.3.5c.

7.6 Performed other editorial changes

7.7 Aligned EP-PS-101-1 with changes in the procedure.

8. EP-PS-200

8.1 Added "initial" to step 5.2.4.a. Added step 5.2.12 "Following INITIAL PAR, CONTINUE to evaluate subsequent PARs per Protective Action Recommendation Determination AND NOTIFY Senior State Official of any changes to the PAR." Added "or PAR" in Step 5.2.18 (currently 5.2.19). [Due to PAR changes]

8.2 Clarified Step 5.2.3 by breaking up in 5.2.3 and 5.2.3b. Added 5.2.3a to "Review and approve the ENR form."

8.3 Added "(White Board in EOF Command and Control Area)" to fifth bullet in Step 5.1.8.

8.4 Aligned EP-PS-200-1 with changes in the procedure.

9. EP-PS-307

9.1 Step 5.3.2.c modified to align with new PAR scheme [Due to PAR changes]

Attachment 4

EMERGENCY PLANNING FORMS AND SUPPLEMENTARY INSTRUCTIONS

Attachment NN
EP-PS-001
Revision 5
Page 176 of 214
Unit 0

PROTECTIVE ACTION RECOMMENDATION STATE NOTIFICATION FORM

Call the Senior State Official at 717-651-2148 (Alternate phone is PEMA Duty Officer at 717-651-2001)

☐ THIS IS A DRILL ☐ THIS IS AN ACTUAL EVENTThis is _____ at PPL Susquehanna. I am providing a Protective Action Recommendation.
Do I have the Senior State Official on the line?

Name of Senior State Official: _____

AIRBORNE RELEASES

FOR INITIAL PAR ONLY

Note: IF PEMA has informed SSES of an impediment to evacuation,
THEN RECOMMEND shelter instead of evacuation.
When PEMA informs SSES the impediment is removed, **RECOMMEND** evacuation, if applicable, at that time.

A General Emergency was declared at _____
due to _____ (EAL designation)

Susquehanna's Protective Action Recommendation is:

☐ SHELTER IN PLACE 360° radius from 0 to 5 miles**OR**☐ SHELTER IN PLACE / ☐ EVACUATE☐ 360° radius from 0 to 2 miles**AND**☐ The following sectors from 2 to 5 miles:**AND**☐ The following sectors from 5 to 10 miles:**AND**

Advise citizens to take KI in accordance with the state's emergency plans and advise remainder of the EPZ to monitor and prepare.

FOR SUBSEQUENT PARS

Note: Do not reduce any previously evacuated areas**Note:** Do not repeat any previously recommend PARs.
Do not recommend evacuating the same sector more than once.

Note: IF PEMA has informed SSES of an impediment to evacuation,
THEN RECOMMEND shelter instead of evacuation.
When PEMA informs SSES the impediment is removed, **RECOMMEND** evacuation, if applicable, at that time.

In addition to previously communicated recommendations, Susquehanna's Protective Action Recommendation is:

☐ SHELTER IN PLACE / ☐ EVACUATE☐ The following additional sectors from 2 to 5 miles:**AND**☐ The following additional sectors from 5 to 10 miles:**AND**☐ The following additional sectors from 10 to _____ miles

LIQUID RELEASES

☐ Divert Danville drinking water supply from the Susquehanna River.

The wind direction is from: _____ ° and wind speed is _____ mph.

Date / Time: _____

☐ THIS IS A DRILL ☐ THIS IS AN ACTUAL EVENT