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One White Flint North

11555 Rockville Pike

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Davis-Besse Nuclear Power Station

EMERGENCY PLAN OFF NORMAL OCCURRENCE PROCEDURE

RA-EP-02850

HAZARDOUS CHEMICAL AND OIL SPILLS

REVISION 10

Prepared by: Justin D. Harris

Procedure Owner: Supervisor- Nuclear Chemistry Services

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1.0 PURPOSE

- 1.1 This procedure identifies and provides the following:
 - 1.1.1 Actions to be taken in the event of a spill or release of nonradiological oil waste, chemicals, gas or smoke, which require HAZWOPER response implementation.
 - 1.1.2 Actions to be taken to respond, mitigate, and cleanup small incidental spills or releases of nonradiological oil, waste, chemicals, gas or smoke which do not require HAZWOPER response implementation.
- 1.2 This procedure fulfills applicable requirements for the following Plans and procedure:
 - 1.2.1 Hazardous Substance Emergency Response Plan and a portion of the written Health and Safety Plan, as required by 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response (HAZWOPER), paragraph (q).
 - 1.2.2 NG-NS-00500, Nuclear Emergency Response.

NOTE 1.3

Response actions which may be required in conjunction with HAZWOPER to implement the RCRA Contingency Plan, SPCC Plan, CERCLA, or SARA response can be found in the Davis-Besse Chemistry Business Practices and Environmental Compliance Guidelines.

- 1.3 This procedure implements response actions in conjunction with Davis-Besse Chemistry Business Practices and Environmental Compliance Guidelines (ECG) to fulfill applicable requirements of the following Plans:
 - 1.3.1 Contingency Plan for the Chemical Waste Storage Area as required by 40 CFR 265 Subpart D, Contingency Plan and Emergency Procedure
 - 1.3.2 Spill Prevention Control and Countermeasure (SPCC) Plan, as required by 40 CFR 112, Oil Pollution Prevention
 - 1.3.3 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as required per 40 CFR 302, Designation, Reportable Quantities and Notification
 - 1.3.4 Superfund Amendments and Reauthorization Act (SARA), 40 CFR 355
 - 1.3.5 Contingency Plan, as required by OEPA Regulation 3745-52, Standards for Generators of Hazardous Waste
 - 1.3.6 DBBP-CHEM-2009, Storm Water Pollution Prevention Plan
 - 1.3.7 DBBP-CHEM-2012, Hazardous Chemical and/or Oil Spills

2.0 REFERENCES

2.1 Developmental

2.1.1 Federal Statutes

- a. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980
- b. Clean Water Act of 1987
- c. Superfund Amendments and Reauthorization Act (SARA) of 1986
- d. Resource Conservation and Recovery Act (RCRA) of 1976
- e. Toxic Substance Control Act (TSCA) of 1976

2.1.2 Code of Federal Regulations and State Codes

- a. 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response
- b. 29 CFR 1910.1200, Hazard Communication
- c. 40 CFR 112, Oil Pollution Prevention
- d. 40 CFR 116, EPA Regulations on Designation of Hazardous Substances under the Federal Water Pollution Control (Clean Water) Act
- e. 40 CFR 122, 123, and 124, National Pollutant Discharge Elimination System Permit Application Regulations for Storm Water Discharges
- f. 40 CFR 261, Identification and Listing of Hazardous Waste
- g. 40 CFR 265 Subpart D, Contingency Plan and Emergency Procedure
- h. 40 CFR Subchapter J (Parts 300-373), Superfund, Emergency Planning, and Community Right to Know
- i. 40 CFR 300, National Oil and Hazardous Substances Pollution Contingency Plan
- j. 49 CFR Subchapter C (Parts 171-177), Hazardous Materials Regulations
- k. Ohio Administration Code 1301:7-9, Underground Storage Tanks (UST)

2.1.3 Fleet/Nuclear Group Procedures

- a. NOP-OP-3001, Chemical Control Program
- b. NG-NS-00500, Nuclear Emergency Response

2.1.4 Other Documents

- a. DBBP-CHEM-2012, Hazardous Chemical and/or Oil Spills.

2.2 Implementation

2.2.1 Code of Federal Regulations

- a. 10 CFR 50.72, Immediate Notification Requirements for Operating Nuclear Power Reactors
- b. 40 CFR 112, Oil Pollution Prevention
- c. 40 CFR 302, Designation, Reportable Quantities and Notification
- d. 40 CFR 355, Emergency Planning and Notification

2.2.2 Federal and State Codes, Standards, and Permits

- a. DBNPS National Pollutant Discharge Elimination System (NPDES) Permit
- b. Ohio Administrative Code; Ohio Environmental Protection Agency (OEPA) Regulations Chapter 3745-52, Standards for Generators of Hazardous Waste.
- c. Ohio Administrative Code; OEPA Regulations Chapter 3750-25, Emergency Release Notification.

2.2.3 Nuclear Operating Administrative Procedure

- a. NOP-LP-4007, Regulatory Agency Communications
- b. NOP-LP-5002, Evaluation of Changes to Emergency Plans and Supporting Documents 10 CFR 50.54(q)
- b. NOP-SS-3001, Procedure Review and Approval
- c. NOP-SS-3300, FirstEnergy Enterprise Records Management Program

2.2.4 Nuclear Group Procedures

- a. NG-DB-00504, Hazardous and Non-Hazardous Chemical Waste Management
- b. NG-NS-00500, Nuclear Emergency Response
- c. NOBP-LP-4021, Regulatory Reports Management

2.2.5 Section/Unit Procedures

- a. DB-CN-00030, National Pollutant Discharge Elimination System (NPDES) Program
- b. NOP-OP-1015, Event Notifications
- c. DB-OP-02529, Fire Procedure
- d. DB-OP-02533, Control Room Emergency Ventilation System Load Shedding
- e. DB-OP-06505, Control Room Emergency Ventilation System Procedure

- f. DB-OP-06511, Control Room Heating, Ventilation and Air Conditioning System Procedure
- g. RA-EP-01500, Emergency Classification
- h. RA-EP-02530, Evacuation

2.2.6 Other Documents

- a. DBNPS Integrated On-Call Report
- b. Davis-Besse Nuclear Power Station Emergency Plan
- c. DBNPS Emergency Plan Telephone Directory
- d. Davis-Besse Chemistry Business Practices and Environmental Compliance Guidelines
 - 1. DBBP-CHEM-2001, Chemistry/Environmental Control Room Habitability Concerns Screening
 - 2. DBBP-CHEM-2003, Resource Conservation and Recovery Act (RCRA) Contingency Plan/Spill Notification Requirements
 - 3. DBBP-CHEM-2005, Spill Prevention Control and Countermeasure (SPCC) Plan
 - 4. DBBP-CHEM-2004, SARA/CERCLA Hazardous Chemical Locations and Spill Event Guidelines
 - 5. ECG-07, PCB Activities and Response Plan
 - 6. DBBP-CHEM-2009, Storm Water Pollution Prevention Plan

3.0 DEFINITIONS

- 3.1 **EMERGENCY RESPONSE** - A response effort by employees from outside the immediate release area or by other designated responders (i.e. site HAZWOPER team or fire brigade, local fire departments) to a spill event which results or is likely to result in an uncontrolled release of a hazardous chemical posing exposure hazards to site or offsite personnel. Initial responses to fire or smoke, or unknown chemical exposures are considered emergency responses and should be responded to by the site Fire Brigade or HAZWOPER team until downgraded. Responses to releases of oil or hazardous chemical(s) that can be mitigated by personnel in the area who are familiar with the chemical hazards and where there is no potential safety or health hazard are not considered to require an emergency response.
- 3.2 **ENVIRONMENT** - For the purpose of this procedure, generally means outside of the system (drum, container, tank, pipeline, process vessel, etc.) intended/designed to contain the hazardous chemical. For NPDES, CERCLA and SPCC, a "release to the environment" is reportable and a spill event if the release exceeds specified limits in the environment outside the facility boundaries and out of control of the facility. For RCRA, TSCA, and UST, "release to the environment" is reportable and a spill event if the release exceeds specified limits.

- 3.3 HAZARDOUS CHEMICAL - For the purpose of this procedure, this term includes the following categories of chemical/substance hazard classifications. Any materials on the following lists must be considered "hazardous". The toxicity levels for these materials will vary dependent upon concentrations and material state. These materials require HAZWOPER response if releases exceed the Permissible Exposure Limit (PEL) or Reportable Quantity (RQ).
- 3.3.1 Hazardous Substance - Any substance, biological or disease causing agent which may result in adverse effects to the health and safety of employees or their offspring as a result of release to the environment and, as listed in 40 CFR Part 302 and 49 CFR Part 172.
 - 3.3.2 Extremely Hazardous Substance - Any substance that can cause serious or adverse health effects with only a single exposure (listed in Appendices A and B of 40 CFR Part 355).
 - 3.3.3 Hazardous Chemical - Any chemical which is considered to be a physical or health hazard under the OSHA's Hazard Communication Standard (29 CFR 1910.1200).
 - 3.3.4 Hazardous Waste - Any liquid or solid waste as identified by one or more characteristics (corrosivity, ignitability, reactivity, or toxicity) or is on one of the EPA lists of hazardous wastes as referenced in 40 CFR 261 and 49 CFR 171.
- 3.4 HAZWOPER-TRAINED INDIVIDUAL - The Incident Commander, On-Scene Coordinator, and Technician Level HAZWOPER Responder is an individual that has received the required 24 hours of training and has site specific competencies as defined by OSHA 29 CFR 1910.120 (q) to respond to a spill event. A HAZWOPER Responder who has received the required 24 hours and site specific training as defined by OSHA 29 CFR 1910.120 to respond to a spill event, must also be qualified on the use of a SCBA to enter the spill zone or be a member of the decontamination team if airborne hazards are present which exceed or potentially exceed the applicable Permissible Exposure Limits.
- 3.5 INCIDENT COMMAND SYSTEM - Consists of the following organizational structure (DBNPS title in parentheses) as defined by OSHA for responding to spills (Attachment 1, Incident Command System, provides additional information for duties of each):
- 3.5.1 Incident Commander (Shift Manager or designee) – Mandatory, Secondary Position Number 7343
 - 3.5.2 On-Scene Coordinator, also known as "Operations Chief" (Unit or Shop Supervisor, Site Safety Representative, Supervisor-Nuclear Chemistry Services or designee, or DB Supply Management) – Mandatory, Secondary Position Number 7343
 - 3.5.3 Four HAZWOPER Technicians (Maintenance, Chemistry, RP, or Operations 24 hr trained individuals) – Mandatory, Secondary Position Number 7344 (SCBA qualified, preferred Technicians Secondary Position) or 7353 (SCBA not required)
 - 3.5.4 Decon Responder or Team – Provided by HAZWOPER Technicians, Step 3.5.3
 - 3.5.5 Safety Person (Site Safety Representative or designee) – Mandatory, Secondary Position Number 7343, 7344 (SCBA qualified) or 7353 (SCBA not required)
 - 3.5.6 Planning Section Person (HAZWOPER trained individual most familiar with affected system) – Optional

- 3.5.7 Information Person (Public Affairs Duty Officer) - Optional
- 3.5.8 Liaison Person (Manager - Security or designee) - Optional
- 3.5.9 Logistics Section Person (On-Call Manager – Maintenance/Planning or designee) – Optional
- 3.5.10 Finance Section Person (Supervisor – Financial Planning and Results or designee) - Optional
- 3.6 MIXED WASTE - Any waste consisting of both a hazardous waste and radioactive material.
- 3.7 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) - A federal program administered by the Ohio Environmental Protection Agency that provides for the permitted discharge of pollutants to state or federal waterways.
- 3.8 NAVIGABLE WATERWAYS - Indicates the following:
 - 3.8.1 All navigable water of the United States (U.S.), and adjacent wetlands (for example, the marsh surrounding DBNPS).
 - 3.8.2 Tributaries of navigable waters of the U.S. (including adjacent wetlands).
 - 3.8.3 All other waters of the U.S. such as intrastate lakes, rivers, streams, and wetlands which may be used for recreational or commercial (including commercial fishing) purposes.
- 3.9 OIL - Includes petroleum, fuel oil, oil refuse, and mixture of oil with wastes other than dredged oil (oils contaminated with PCBs or hazardous chemicals shall be considered Hazardous Chemicals).
- 3.10 OIL BOOM - A floating device which confines oil spilled on the surface of a body of water.
- 3.11 REPORTABLE QUANTITY (RQ) - When released, the minimum quantity of a hazardous substance as identified in 40 CFR Parts 302 and 355 which requires emergency notification to a regulatory agency. This notification may be required as soon as 30 minutes after the release is determined to have exceeded the RQ.
- 3.12 SPILL AREA ZONES/BOUNDARIES - The following zones are established around a spill area to maintain control of the area and personnel safety:
 - 3.12.1 Hot Zone - Consists of the actual spill area.
 - 3.12.2 Warm Zone - Consists of an area surrounding the hot zone at a distance that provides safety from physical contact hazards and/or any airborne chemical contamination, an area for setting up decontamination materials, and entry/exit work space for teams in personal protective equipment. Only the entering/exiting spill response team and decon personnel are permitted in this area.
 - 3.12.3 Cold Zone - Consists of an area outside of the Warm Zone that is used by the remaining responding HAZWOPER trained individuals for support activities.

- 3.13 SPILL/INCIDENTAL RELEASE - Small spills or incidental releases of known chemicals, gases or smoke which can be absorbed, neutralized or contained at the time of release by employees in the immediate release area or by maintenance personnel, or fuel/oil not meeting definition of spill event in Step 3.14, which pose no safety or health hazard (i.e. fire, explosion, or chemical exposure greater than PEL or RQs), and, do not require notifications of the release are not "spill events" and do not require "emergency responses" nor implementation of the HAZWOPER Response Plan.
- 3.14 SPILL EVENT -
- 3.14.1 A discharge (any spill, leaking, pumping, pouring, emptying, or dumping except any discharges authorized by a Federal or State permit, such as an NPDES permit) of oil into or upon navigable waters or adjoining shorelines in harmful quantities (causes a film or sheen on, or discoloration of, water surface, or causes a sludge or emulsion to be deposited beneath water surface or upon adjoining shorelines).
- 3.14.2 A release (spilling, leaking, pumping, pouring, emptying, discharging, injecting, leaching, dumping, or disposing, except any release as authorized by a federal or state permit such as an NPDES permit) of a hazardous chemical, mixed waste or polychlorinated biphenyl (PCB) containing oils into the environment.
- 3.14.3 A leak, spill, gas release or discharge of any material of unknown source, or uncontrolled fire and/or smoke from a chemical source.
- 3.14.4 Release of greater than 25 gallons of oil or fuel within a 24-hour period from a registered underground storage tank.
- 3.15 SPILL KITS - For the purpose of this procedure, these kits are used for chemical hazards and are NOT the same spill kits used for Radiation Protection (RP) purposes in the Radiologically Restricted Area (RRA). (Attachment 2, Locations of Spill Control Equipment, provides information on spill kit locations.)
- 3.16 STORM WATER DISCHARGE ASSOCIATED WITH INDUSTRIAL ACTIVITY - The discharge from any conveyance which is used for collecting and conveying storm water and which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant.
- 3.17 TLV - THRESHOLD LIMIT VALUE - The airborne concentration of a material to which nearly all workers can be exposed without adverse effects.
- 3.18 TLV-TWA - THRESHOLD LIMIT VALUE-TIME WEIGHTED AVERAGE - The allowable time weighted average concentration for a normal 8-hour work day or 40-hour week.

4.0 RESPONSIBILITIES

- 4.1 The Director - Site Operations shall ensure that HAZWOPER trained individuals are available to respond to an emergency oil, mixed waste, or hazardous chemical spill event.
- 4.2 The Shift Manager or designee shall:
 - 4.2.1 Make required onsite and offsite notifications (reference Spill Notification Form, ED 7892, Part I, for Shift Manager required notifications).
 - 4.2.2 Determine if a spill event has occurred and enter into DBNPS Emergency Plan for HAZWOPER Response as necessary.
 - 4.2.3 Dispatch HAZWOPER trained individuals to the spill event site within the Protected Area or the Owner-Controlled Area.
- 4.3 The Manager - Site Operations shall provide HAZWOPER trained individuals for responding to spills to perform actions on equipment as required by Operations and this procedure. HAZWOPER position responsibilities are fulfilled in accordance with Attachment 1.
- 4.4 The Manager – Site Maintenance shall:
 - 4.4.1 Provide HAZWOPER trained individuals for responding as directed to a spill event within the Protected Area or the Owner-Controlled Area.
 - 4.4.2 Isolate site waterways during a spill event as directed by the Shift Manager or designee or On-Scene Coordinator. (Attachment 3, Site Map of Flapper Gates and Marsh Pumps, may be referenced for locations of isolation equipment.)
 - 4.4.3 Provide cleanup of spilled material as directed and coordinated by the Shift Manager or Supervisor - Nuclear Chemistry Services.
- 4.5 The Manager – Site Chemistry shall:
 - 4.5.1 Provide HAZWOPER trained individuals for responding to spills to perform actions on equipment as required by Chemistry and this procedure, and analyze released process fluids, etc. for hazardous chemical levels when possible.
 - 4.5.2 Consult with Radiation Protection (RP) prior to HAZWOPER trained individuals responding to spills in Radiologically Restricted Areas (RRA). Expertise for containment/cleanup in the RRA to prevent/reduce spread of radioactive contamination may be required.
 - 4.5.3 Ensure timely mitigation of spill event.
 - 4.5.4 Ensure required onsite and offsite notifications are performed as required per Ohio Environmental Protection Agency (OEPA) Regulations Chapter 3750-25, Emergency Release Notifications.
- 4.6 The Manager – DB Supply Chain shall provide technical assistance to the HAZWOPER team responding to spills in the warehouses and associated yards.

- 4.7 The Manager - Site Training shall provide adequate training to personnel to meet the requirements of 29 CFR 1910.120.
- 4.8 The Supervisor – Nuclear Chemistry Services shall:
 - 4.8.1 Perform local, state, and/or federal agency notifications if required (reference Subsection 6.4) and Spill Notification Form, ED 7892, Part II, for Chemistry required notifications. Notifications may be required in as little as 30 minutes once determined reportable.
 - 4.8.2 Provide technical assistance during response and cleanup efforts, including verification of appropriate contingency plan implementation, and qualifications if required.
 - 4.8.3 Ensure that spill kits for use with chemical or oil spill events are stocked with emergency response equipment.
 - 4.8.4 Prepare any required regulatory report to Environmental Protection Agency (EPA).
- 4.9 The Site Safety Representative shall:
 - 4.9.1 In conjunction with HAZWOPER Safety Person, ensure personnel protective equipment and practices are prescribed during an emergency response and decontamination area is established as applicable prior to personnel entering contaminated zone for emergency response. (Attachment 4, Decontamination Area Establishment and Methods, may be referenced for equipment and guidance.)
 - 4.9.2 Ensure monitoring of personnel for hazardous chemical exposure is performed.
 - 4.9.3 Prepare any required regulatory report to Occupational Safety Health Association (OSHA).
- 4.10 All DBNPS personnel shall immediately report oil, mixed waste, or hazardous chemical spill events to the Shift Manager.

5.0 INITIATING CONDITIONS

- 5.1 If a spill/incidental release of nonradiological oil, chemicals, gas or smoke has occurred which poses no threat of personnel exposure exceeding permissible levels (including airborne exposure), or migration to the offsite environment, or NPDES pathways, and, is not required to be reported to local, state or federal agencies, the spill may be mitigated at the time of the release by employees in the immediate area or by maintenance personnel. The HAZWOPER Response Plan is not required to be implemented and no further notifications are required. Spills considered incidental releases and their recommended responses are outlined in Attachment 5.
- 5.1.1 IF a vendor or contractor is employed/requested to assist in mitigation activities, THEN ensure the Shift Manager is informed to notify Duty Plant Manager.
- 5.1.2 To ensure compliance with requirements of NOP-OP-1015, the Shift Manager shall be informed of non-radiological oil, chemical, gas or smoke releases including incidental releases listed in Attachment 5, regardless of whether HAZWOPER response is required or activated. No Shift Manager actions are required for Incidental Releases.
- 5.1.3 The Spill Notification Form (ED 7892) may be referenced for additional phone numbers or used for information purposes to document incidental or non-reportable spill information (forward to Supervisor-Nuclear Chemistry Services).

NOTE 5.2 - 5.6

If spill conditions meet criteria in steps 5.2 – 5.6 and HAZWOPER response, evacuation and/or potential agency notifications are required, then Emergency Classification in accordance with RA-EP-01500, Emergency Classification, may be required within 15 minutes.

- 5.2 IF a sufficient volume of oil (i.e. 25 gallons) has leaked and has reached the Training Center Pond and/or the settling basins and has a potential to migrate offsite, THEN go to DBBP-CHEM-2005, Spill Prevention Control and Countermeasure Plan (SPCC).
- 5.3 This procedure shall be used if the Shift Manager has determined that entry into this procedure is necessary based on conditions described in step 5.4, or any conditions under step 5.5, or after consultation with the On-Call Manager - Chemistry. (During normal working hours, contact the Supervisor – Nuclear Chemistry Services/designee.)
- 5.4 An alarm procedure has directed personnel to this procedure.

- 5.5 IF a hazardous chemical, oil, waste spill event or release of gas or smoke as described below has occurred at DBNPS,
THEN the Shift Manager shall initiate the DBNPS Emergency Plan for HAZWOPER Response:

5.5.1 Leakage/ruptured tank or drum of the following:

- Hydrazine and/or ammonium hydroxide/morpholine/advanced amine tank(s)
- Drum(s) of Nalco 1355 Corrosion Inhibitor, Nalco 7330 and Nalco 7338 biocides, Calgon Pre-Tect 9002 or 4000
- Hydrogen Peroxide
- Other amine (i.e., Nalco CA-926C, Nalco 92UM001)

5.5.2 Hydrazine release in excess of the EPA reportable quantity of one pound, i.e. 60 gallons of 2000 ppm process fluid, or 0.34 gallons of a standard 34% solution, which poses a personal hazard,

5.5.3 Sodium hydroxide, sulfuric acid, sodium hypochlorite and/or sodium bromide tank(s) has leaked/ruptured (Water Treatment Plant).

5.5.4 A spill or leak has occurred at a warehouse storage location which may expose personnel to hazardous materials exceeding permissible levels (i.e. drum rupture of sulfuric acid, hydrazine etc.)

NOTE 5.5.5

The reportable quantity for PCB is 1 pound.

- 5.5.5 Any oil leakage which may have originated from equipment with PCB containing oil (overhead lighting or motor/inverter capacitors).
- 5.5.6 An event which presents exposure to Asbestos waste or Asbestos containing material (i.e., insulations) has occurred,
- 5.5.7 A spill or leak has occurred at any work location, satellite chemical storage area, the main Chemical Waste Storage Area (CWSA) Building, or Chemical Waste Accumulation Area (CWAAs) which may expose personnel to hazardous materials, hazardous waste, or mixed waste in amounts exceeding permissible levels (this includes miscellaneous laboratory solution, chemical or reagent spills or leaks which may be toxic, reactive, ignitable or corrosive),
- 5.5.8 A leak or spill or gas release from an unknown source or uncontrolled fire and smoke event has occurred,
- 5.5.9 A spill or leak from any source (onsite or offsite) which could affect control room air quality.
- 5.6 Contact the Supervisor - Nuclear Chemistry Services/designee for determination of the required response for spills not listed under Step 5.1 or Step 5.5.

6.0 PROCEDURE

6.1 Activation of the HAZWOPER Response Plan

6.1.1 The HAZWOPER Response Plan is not required to be activated for spills or incidental releases as defined in Steps 3.13 or 5.1. This includes nonradiological oils, chemicals, gas or smoke either outlined in Attachment 5, or which do not pose personnel exposures exceeding PELs, nor releases to the environment exceeding the RQ.

- a. Spills or releases not listed in Attachment 5 may also meet definition and criteria of incidental release as determined by the Supervisor – Nuclear Chemistry Services.

6.1.2 Actions to determine if HAZWOPER or emergency response should be activated may be initiated by one or more of the following:

- a. An alarm is activated that gives indication of a possible spill, for example, an unexpected low level in a hazardous chemical/oil tank and/or high sump alarms in areas of such tanks.
- b. A person has discovered a spill or chemical/oil fire and has promptly called the Control Room via Gai-Tronics Line 5 or extension 7911.

NOTE 6.2

Steps 6.2.1 through 6.2.11 (inclusive) can be conducted concurrently.

6.2 Shift Manager Actions

The Shift Manager or designee shall:

6.2.1 Request from the person discovering the spill event at least the following information (data may be documented in Part I of the Spill Notification Form, ED 7892):

- a. Source of material spilled
- b. Size/Amount of material
- c. Nature/Type of material
- d. Location and movement of spill

6.2.2 Clear the spill area of personnel as follows:

- a. Inside the Protected Area, announce over the Gai-Tronics that personnel must leave and stay clear of the spill or fire involving a spill area.
- b. In the Owner-Controlled Area, notify Security to request personnel to leave and stay clear of the spill area.

6.2.3 Ensure the area is posted to avoid personnel exposure.

NOTE 6.2.4

Standard Fire Brigade turnout gear meets Level B HAZWOPER protection for fire and smoke response. The Fire Brigade is HAZWOPER trained for initial response to spills from site sources, however, HAZWOPER responder Level B protective suits may be required when chemical splash or toxic vapor hazard is present.

6.2.4 If the event is a fire involving spilled oil, hazardous chemicals, or mixed waste:

- a. Inside the Protected Area, activate the fire brigade, etc., and follow appropriate fire fighting procedures in accordance with DB-OP-02529, Fire Procedure.

6.2.5 As necessary, direct the following actions:

- a. Lockout sump pumps in and/or adjacent to the spill area [DBBP-CHEM-2005, Spill Prevention Control and Countermeasure Plan (SPCC), may be referenced for specific instructions when responding to oil spills].
- b. Lockout the settling basin transfer pumps.

NOTE 6.2.6

- Depending on conditions of the spill event, certain regulatory agencies must be immediately notified of the spill upon discovery.
- When using the Integrated On Call Report for initial onsite notification, the On-Call Manager - Chemistry should be initially contacted.
- If spill is listed as an incidental spill in Attachment 5, HAZWOPER is not required to mitigate the spill.

6.2.6 Contact the Supervisor - Nuclear Chemistry Services/designee with spill event conditions (i.e. quantity, substance released, movement of spill, etc.). The Supervisor/designee will:

- Aid in determination if activation of the HAZWOPER Response Plan is required,
- Aid in determination of whether the quantity meets the regulatory limits for reporting and contingency plan implementation (reference Subsection 6.4),
- Contact Site Safety Representative for determination of personnel exposure concerns when hazardous material responses are not listed in Attachment 5.

- 6.2.7 If the HAZWOPER Response Plan will not be implemented and no further action is required, and Part I of the Spill Notification Form (ED 7892) was initiated, forward the SNF (for information purposes only) to the Supervisor - Nuclear Chemistry Services.
- 6.2.8 Evaluate spill event conditions for emergency classification in accordance with RA-EP-01500, Emergency Classification.
- 6.2.9 IF evacuation is necessary,
THEN determine the extent of the area to be evacuated,
AND implement RA-EP-02530, Evacuation.
- 6.2.10 IF the HAZWOPER Response Plan is initiated,
THEN notify the following:
- a. Duty Operations Manager
 - b. Duty Maintenance/Planning Manager
 - c. Duty DB Supply Manager, for spill in the warehouses or associated yards
 - d. Duty Manager Radiation Protection for spills in the RRA
 - e. Nuclear Security if off-site vendors will be required.
- 6.2.11 IF unusual vapors or fumes are present in the Control Room,
THEN manually isolate the Control Room ventilation air supply in accordance with DB-OP-06511, Control Room Heating, Ventilation and Air Conditioning System Procedure.
- 6.2.12 IF Control Room Emergency Ventilation System (CREVS) is put in service in accordance with DB-OP-06505, Control Room Emergency Ventilation System Procedure.
AND the Control Room Normal HVAC is shutdown,
THEN evaluate local ventilation concerns and ensure proper habitability of the Control Room, in accordance with DB-OP-02533, Control Room Emergency Ventilation System Load Shedding.
- a. Control Room Habitability evaluations for SARA/CERCLA chemicals stored onsite are listed in DBBP-CHEM-2004.
- 6.2.13 IF the HAZWOPER Response Plan is required to be implemented,
THEN request HAZWOPER trained individuals report to the Incident Area for briefing of spill event. In general, Protected Area HAZWOPER responders will be certified individuals from Operations as the members are most likely to be familiar with equipment and be Fire Brigade qualified.
- a. For spills in the Owner-Controlled Area, the HAZWOPER responders should be certified individuals from Maintenance, Chemistry, Safety, and available Operations personnel who are not part of the required on shift complement. A Maintenance Supervisor(s) and additional servicemen may be called in for assistance. Offsite response organizations may be called for assistance. (Ensure compliance with Step 5.1.1)

- b. Determine response equipment needed for spill mitigation.
1. Typical locations of spill kits can be found in an Attachment 2, Locations of Spill Control Equipment. Environmental personnel under the direction of the Supervisor Nuclear Chemistry Services have current inventory listings.
 2. The Inventory Form format is controlled by this procedure. Changes to the format will be processed as a procedure alteration in accordance with NOP-SS-3001, Procedure Review and Approval.

NOTE 6.2.14

A minimum of four to six HAZWOPER trained individuals are needed for responding to and entering a spill event area. A list of currently certified HAZWOPER responders (Technician and Incident Commander Levels) is available in the FITS Web Qual Matrix (reference "Other (QR, Supervisors, FAT, NHS)", "HAZWOPER Team Members", Activity Code GEN-HWR").

6.2.14 Designate a minimum of four to six HAZWOPER trained individuals to the following Incident Command System positions and actions (see Attachment 1, Incident Command System):

- a. One individual may act as the On-Scene Coordinator and act as the Safety Person.
IF safety is not compromised, the individual may also act as the Decon Team and second member of the Backup Entry Team.

NOTE 6.2.14.b

The On-Scene Coordinator will establish the On-Scene Incident Command Post upwind from the spill and in a cold zone area.

- b. For spills in the Owner-Controlled Area, one of the following individuals may act as the On-Scene Coordinator:
- Supervisor - Nuclear Chemistry Services/designee
 - Site Safety Representative/designee
 - Supervisor - Maintenance/designee
- c. Two individuals as the Initial Entry Team
- d. Two individuals as the Backup Entry Team
- e. One individual as the Decon Team – may be a member of Backup Entry Team if safety is not compromised.

- 6.2.15 Dispatch HAZWOPER trained individuals to the spill area.
- 6.2.16 Record spill event information and notifications for Part I of ED 7892, Spill Notification Form (SNF), and forward to the Supervisor - Nuclear Chemistry Services.

WARNING 6.3

Chemicals used onsite have been evaluated for required response equipment. Standard Fire Brigade turn out gear meets Level B protection for fire and smoke response for ignitable or flammable hazardous materials. HAZWOPER Level B responder suits, provide recommended permeation times and are acceptable for initial response to onsite chemical and toxic hazard releases.

6.3 Spill Response Actions

- 6.3.1 The Incident Command System Safety Person or Site Safety Representative/designee shall:
- a. Ensure appropriate PPE is selected and used by responding personnel. (Attachment 6, Personnel Protective Equipment Compatibility Chart, may be referenced for recommended PPE).
 1. For unknown atmosphere/spill events from catastrophic releases of unknown gasses from fires or explosions, Level A Responder suits shall be obtained for use, or an outside response agency shall be requested to respond. Information regarding Mutual Aid agreements is available from Chemistry.
 2. Level B suits, PPE, rubber boots and butyl gloves, and SCBA shall be worn initially to conduct an assessment of the spill area and also during response actions until the Safety Representative/ designated Safety person determines that a lower level of protection is acceptable based on conditions.
 - b. Monitor personnel (i.e. SCBA times, physiological conditions such as heat stress, etc.) and maintain chemical exposure records.
- 6.3.2 Individuals responding to the spill area shall notify the Incident Commander that they are ready to enter the spill area.
- a. Personnel responding to a spill shall maintain a buddy system to ensure rapid assistance in the event of an emergency. A backup team (with an equivalent level of personal protective equipment [PPE] and self-contained breathing apparatus [SCBA], unless determined otherwise) is required to be standing by.
- 6.3.3 The On-Scene Coordinator and HAZWOPER trained individuals shall:
- a. Ensure all individuals, except the spill response team, are cleared from the spill area.

- b. At the spill area, establish the boundaries between the hot, warm, and cold zones.
- c. Set up a decontamination area, (refer to Attachment 4, Decontamination Area Establishment and Methods), in the warm zone adjacent to the spill area, if applicable.

NOTE 6.3.3.d

The Safety Representative may be able to assist with identifying spilled material by using monitoring equipment.

- d. Attempt to identify the spilled material.
- e. Obtain the Safety Data Sheet (SDS) on the spilled material in accordance with NOP-OP-3001 for use by the spill response team.
- f. Obtain weather data from the DBNPS meteorological monitoring system for spill pathway projections, etc., if necessary.
- g. Evaluate the situation and develop a plan of action which may consist of one or more of the following:
 - 1. Covering nearby drains
 - 2. Locking out pumps
 - 3. Containing spilled material by diking, absorbing, plugging, patching, and/or overpacking the container
 - 4. Maintenance personnel shall isolate the ponds or marsh by closing flapper gates or turning off/locking out marsh pumps as requested by the On-Scene Coordinator or the Supervisor - Nuclear Chemistry Services/ designee (see Attachment 3, Site Map of Flapper Gates and Marsh Pumps). This action is to prevent the spilled material from reaching the Navarre Marsh, Toussaint River, or Lake Erie.
- h. Drain any fluid from defective equipment.
- i. Neutralize or treat the spilled material to render it less harmful, if applicable.
- j. Collect the spilled material using a pump or vacuum, if applicable.
- k. Evaluate the plan of action continuously due to changing spill area conditions.
- l. Provide clear prompt site communications as the event progresses or is mitigated.

- 6.3.4 The On-Scene Coordinator, as directed by the Supervisor - Nuclear Chemistry Services/designee will instruct the HAZWOPER Team on specific remediation, which may include the following:
- a. In the event of an oil spill, Section 6.3 of DBBP-CHEM-2005, Spill Prevention Control and Countermeasures (SPCC) Plan, may be referenced for detailed actions/information to mitigate the spill.
 - b. In the event of a hazardous chemical spill involving hazardous chemicals or wastes, DBBP-CHEM-2004, SARA/CERCLA Hazardous Chemical Locations and Spill Event Guidelines, may be referenced for detailed actions/information to mitigate the spill.
 - c. PCB spills may also require implementation of ECG-07, PCB Activities and Response Plan, for sampling plans and cleanup standards.
- 6.3.5 For spills too large for site personnel to mitigate, the Supervisor - Nuclear Chemistry Services/designee shall make arrangements for an offsite environmental services contractor to respond with assistance.

6.4 Environmental Compliance Contingency Plan Determinations/Notifications

The Supervisor - Nuclear Chemistry Services/designee shall:

- 6.4.1 Request Chemistry personnel collect and analyze samples of process fluids, settling basins, ponds, or other points as applicable.
- 6.4.2 Based upon the amount and type of material released, determine if HAZWOPER response is required and/or if implementation of the SPCC (DBBP-CHEM-2005) CERCLA (DBBP-CHEM-2004), RCRA (DBBP-CHEM-2003), or Stormwater Pollution Prevention Plan (DBBP-CHEM-2009) is required.
- 6.4.3 Complete Part II A of ED7892, Spill Notification Form, upon notification from the Shift Manager.
- 6.4.4 If HAZWOPER is implemented or agency notifications are required, notify the following personnel, at a minimum, and document on Part II B of ED7892, Spill Notification Form:
 - a. Manager – Site Chemistry
 - b. Director-Site Operations
 - c. Manager – Site Regulatory Compliance, if agency notifications were made,
 - d. Public Affairs, courtesy call
 - e. Manager – Site Maintenance/designee (only for spills originating from electrical equipment).

NOTE 6.4.5

Local, state, and federal agencies phone numbers can be found on Part II of the Spill Notification Form (ED 7892). Additional numbers can be found in the DBNPS Emergency Plan Telephone Directory, Attachment 2 of DBBP-CHEM-2003 and Attachment 1 of DBBP-CHEM-2005.

- 6.4.5 IF the substance that meets or exceeds the Reportable Quantity (RQ) for a RCRA Hazardous Waste, or is a SARA/CERCLA hazardous substance or extremely hazardous substance (40 CFR 302/355 or DBBP-CHEM-2004), has been released from the intended system, and has spread offsite or out of control of the facility, THEN notify the State Emergency Response Commission (SERC) of the Ohio Environmental Protection Agency (OEPA), the National Response Center (NRC), and the Ottawa County Sheriff's Office to activate Local Emergency Planning Committee (LEPC) and local Fire Department notifications. Reference the Spill Notification Form (ED 7892), DBNPS Emergency Plan Telephone Directory or Attachment 1 of DBBP-CHEM-2003.
- 6.4.6 IF the released substance is gasoline or oil exceeding 25 gallons and has spread or has the potential to spread offsite, or has been released in harmful quantities into or upon navigable waters or adjoining shorelines (reference DBBP-CHEM-2005), THEN notify the SERC of OEPA, and the Ottawa County Sheriff's Office to activate Local Emergency Planning Committee (LEPC), and local Fire Department notifications. Also notify the U.S. Coast Guard if the substance has spread into navigable waterways. Reference the Spill Notification Form (ED 7892), the DBNPS Emergency Plan Telephone Directory or DBBP-CHEM-2005.
- 6.4.7 IF the spilled substance reaches a storm drain, sump or other water pathway and results in a DBNPS National Pollutant Discharge Elimination System (NPDES) permit violation, THEN notify the OEPA Emergency Hotline and the OEPA Northwest District Office. (Reference DBBP-CHEM-2009 for storm water and DB-CN-00030 for NPDES industrial process discharges).
- 6.4.8 IF the release does not meet any of the conditions in 6.4.5 through 6.4.7, THEN the Supervisor - Nuclear Chemistry Services/designee should:
- a. Consult with the Manager – Site Regulatory Compliance, the Manager – Site Chemistry, or the Director-Site Operations to determine which, if any, of the agencies listed in Part II C or D of ED 7892, Spill Notification Form, are to be notified of the event.
 - b. Upon recommendation, make the appropriate notifications and document on the form.
- 6.4.9 The Supervisor - Nuclear Chemistry Services/designee shall document all calls to a regulatory agency and any other appropriate above calls on a Telephone Call Documentation Form (ED 6650).

- 6.4.10 The emergency notification to the government agencies shall be followed up with a written report as soon as practical within the specified time frame. Environmental reports shall be prepared by the Supervisor - Nuclear Chemistry Services/designee and submitted in accordance with NOBP-LP-4021, Regulatory Reports Management, and NOP-LP-4007, Regulatory Agency Communications, as appropriate.

6.5 10 CFR 50.72 Notifications

- 6.5.1 IF any of the offsite agencies were notified as identified in accordance with Subsection 6.4, THEN the Supervisor - Nuclear Chemistry Services/designee shall ensure the Shift Manager is notified.
- 6.5.2 The Shift Manager or designee shall ensure that the Nuclear Regulatory Commission has been notified as required by 10 CFR 50.72(b), Immediate Notification Requirements for Operating Nuclear Power Reactors, Non-Emergency Events, Four-Hour Reports. Refer to NOP-OP-1015, Event Notifications.

6.6 Cleanup and Recovery Actions

- 6.6.1 The spilled substance and cleanup materials such as used pads, pillows, booms, clothing, and other equipment shall be recovered and placed in drums or other approved containers as identified by the Supervisor - Nuclear Chemistry Services/designee.
- 6.6.2 Label and accumulate/store these containers in accordance with NG-DB-00504, Hazardous and Non-Hazardous Chemical Waste Management.
- 6.6.3 The Supervisor - Nuclear Chemistry Services/designee shall:
- a. Make arrangements for disposal of collected waste materials in accordance with the requirements of NG-DB-00504, Hazardous and Non-Hazardous Chemical Waste Management.
 - b. Ensure that environmental samples are collected and analyzed, to verify the cleanup response is adequate.

6.7 Spill Notification Form Completion and Deactivation

- 6.7.1 The Shift Manager or designee, in consultation with the Supervisor - Nuclear Chemistry Services/designee, shall determine that all spilled chemicals or oils have been confined, controlled, absorbed, or transported offsite and pose no threat to personnel, the plant, the environment, or to navigable waterways.
- 6.7.2 The Supervisor - Nuclear Chemistry Services/designee shall complete Part II E of form ED 7892, in accordance with 29 CFR 1910.120, as applicable, when the event is terminated.
- 6.7.3 The Spill Notification Form package shall be submitted to Records Management according to NOP-SS-3300, FirstEnergy Enterprise Records Management Program.

7.0 FINAL CONDITIONS

- 7.1 HAZWOPER responses and/or actions taken to mitigate fire, smoke or incidental spills/releases of nonradiological waste, chemicals, or oils, are considered terminated once the spill has been contained, recycled, or removed from the DBNPS site, and poses no threat to the health and safety of personnel, the plant, or the environment.
- 7.2 Clear prompt communications shall be disseminated to site personnel explaining event closure.

NOTE 8.0

Deposition of completed records as described in this Section is applicable only when use for an actual event. Records completed during drills and exercises are captured in accordance with RA-EP-00200, Emergency Plan Drill and Exercise Program.

8.0 RECORDS

- 8.1 The following quality assurance records are completed by this procedure and may be listed on the Nuclear Records List, captured, and submitted to Nuclear Records Management in accordance with NOP-SS-3300:
 - 8.1.1 Completed Spill Notification Form, (ED 7892) and associated documentation
 - 8.1.2 Telephone Call Documentation Form, (ED 6650)
- 8.2 The following non-quality assurance records are completed by this procedure and may be captured and submitted to Nuclear Records Management, in accordance with NOP-SS-3300:
 - 8.2.1 None

ATTACHMENT 1: INCIDENT COMMAND SYSTEM

Page 1 of 3

The Incident Command System shall consist of the following organizational structure as defined by OSHA and includes reference to DBNPS plant and emergency plan titles (any number of these positions may be used in a spill response depending on the spill size, etc., however, a minimum of 4-6 persons must be assigned to fulfill positions 1, 2, 3 and 4 (reference step 3.5 for Secondary Position Numbers):

<u>OSHA Position</u>	<u>DBNPS Title</u>	<u>Actions/Duties</u>
1. Incident Commander	Shift Manager or designee	<ul style="list-style-type: none"> • Develops and implements strategic decisions. • Activates the Incident Command System (Hazardous Substance Emergency Plan duties) and HAZWOPER trained individuals. • Maintains overall control of spill event. • Requires GEN-HWR annual training and position competencies in accordance with 29 CFR 1910.120 (q)
2. On-Scene Coordinator	Unit or Shop Supervisor, Site Safety Representative, Supervisor – Nuclear Chemistry Services, or DB Supply Management (if Owner-Controlled Area)	<ul style="list-style-type: none"> • Oversees and coordinates response actions at the spill area. • Maintains communications with the Incident Commander. • Controls access of personnel to spill area • Requires GEN-HWR annual training and position competencies in accordance with 29 CFR 1910.120 (q)
3. Safety Person	Initially may be any HAZWOPER trained Individual (Maintenance, Chemistry, RP or Operations), who would turn over actions to the Site Safety Representative/designee	<ul style="list-style-type: none"> • Responsible for safe conditions and actions such as ensuring barricade rope is in place and unnecessary personnel are kept out of the spill area. • Monitoring SCBA times for HAZWOPER individuals in spill area. • Ensure proper PPE is used. • Monitor HAZWOPER individuals for other physiological conditions, i.e. heat stress, etc. • Requires GEN-HWR annual training and position competencies in accordance with 29 CFR 1910.120 (q)

ATTACHMENT 1: INCIDENT COMMAND SYSTEM

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<u>OSHA Position</u>	<u>DBNPS Title</u>	<u>Actions/Duties</u>
4. Technician	A Maintenance, Chemistry, RP or Operations HAZWOPER 24-hr trained individual.	<ul style="list-style-type: none"> • Requires response in teams (Initial and Backup). • Responsible for hot zone mitigation as directed by the Incident Commander/On-Scene Coordinator. • Responsible for the mitigation of incident, decontamination and/or restoration as directed by the On-Scene Coordinator and/or Incident Commander. • Requires GEN-HWR annual training and position competencies in accordance with 29 CFR 1910.120 (q) • Requires SCBA qualifications for atmospheric conditions exceeding PELs. • A minimum of 2 teams, Backup and Entry, must be established prior to entry. One member of the Backup team may act as On-Scene Coordinator, Safety person, and perform decontamination; if safety is not compromised.

NOTE 5

Any governmental agency (i.e., EPA, OSHA, etc.) representative shall be referred to the Supervisor - Nuclear Chemistry Services or On-Call Regulatory Compliance Manager.

5. Information Person	Public Affairs Duty Officer	<ul style="list-style-type: none"> • Acts as contact for disseminating information on spill event to media. • Optional
6. Liaison Person	Security acts as escort in Protected Area	<ul style="list-style-type: none"> • Acts as contact upon arrival at DBNPS for offsite groups, i.e. fire departments, emergency medical squad, etc., responding to spill event. • Optional
7. Planning Section	A HAZWOPER trained individual responding that is most knowledgeable of system involved in the spill	<ul style="list-style-type: none"> • Collects, evaluates, and disseminates information on the spill event. • Understands the current spill event condition. • Continuously predicts probable cause of events during response to spill event • Prepares alternative course of actions to assist in maintaining control of spill event. • Optional

ATTACHMENT 1: INCIDENT COMMAND SYSTEM

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<u>OSHA Position</u>	<u>DBNPS Title</u>	<u>Actions/Duties</u>
8. Logistics Section Person	Manager – Site Maintenance	<ul style="list-style-type: none">• Provides/stages materials, facilities, services, etc. to support spill response actions.• Optional
9. Finance Section Person	Supervisor-Financial Planning and Results	<ul style="list-style-type: none">• Performs financial analysis of spill event.• Optional

NOTE

Minimum response to implement the HAZWOPER Response is a 4 to 6 man team as follows:

- 1 On-Scene coordinator/safety person
- 2 Entry persons
- 2 Backup entry persons
- 1 Decontamination person

The On-scene Coordinator, Safety person and Decontamination person may be filled by one member of the backup entry team so long as the safety of the original entry team is not compromised.

ATTACHMENT 2: LOCATIONS OF SPILL CONTROL EQUIPMENT

Page 1 of 1

Spill Kit Inventories are based on materials present in the area, the potential spill characteristics, and remediation/Personal Protective Equipment (PPE) supplies needed for the area. The kit contents are listed on the kit. Main chemical spill kits containing HAZWOPER response equipment for HAZWOPER Level B response may be found in the Turbine Building (Main Spill Kit located against the South wall). The Warehouse Spill Kits are for general cleanup (do not contain Level B response suits).

Other small kits (designated PPE Kits) are for ease of obtaining general PPE such as gloves and goggles for small incidental releases or for containing small releases. These are not HAZWOPER or General Spill response kits and may be transient or removed as required.

A. INSIDE PROTECTED AREA - Spill Kits

I. Turbine Building

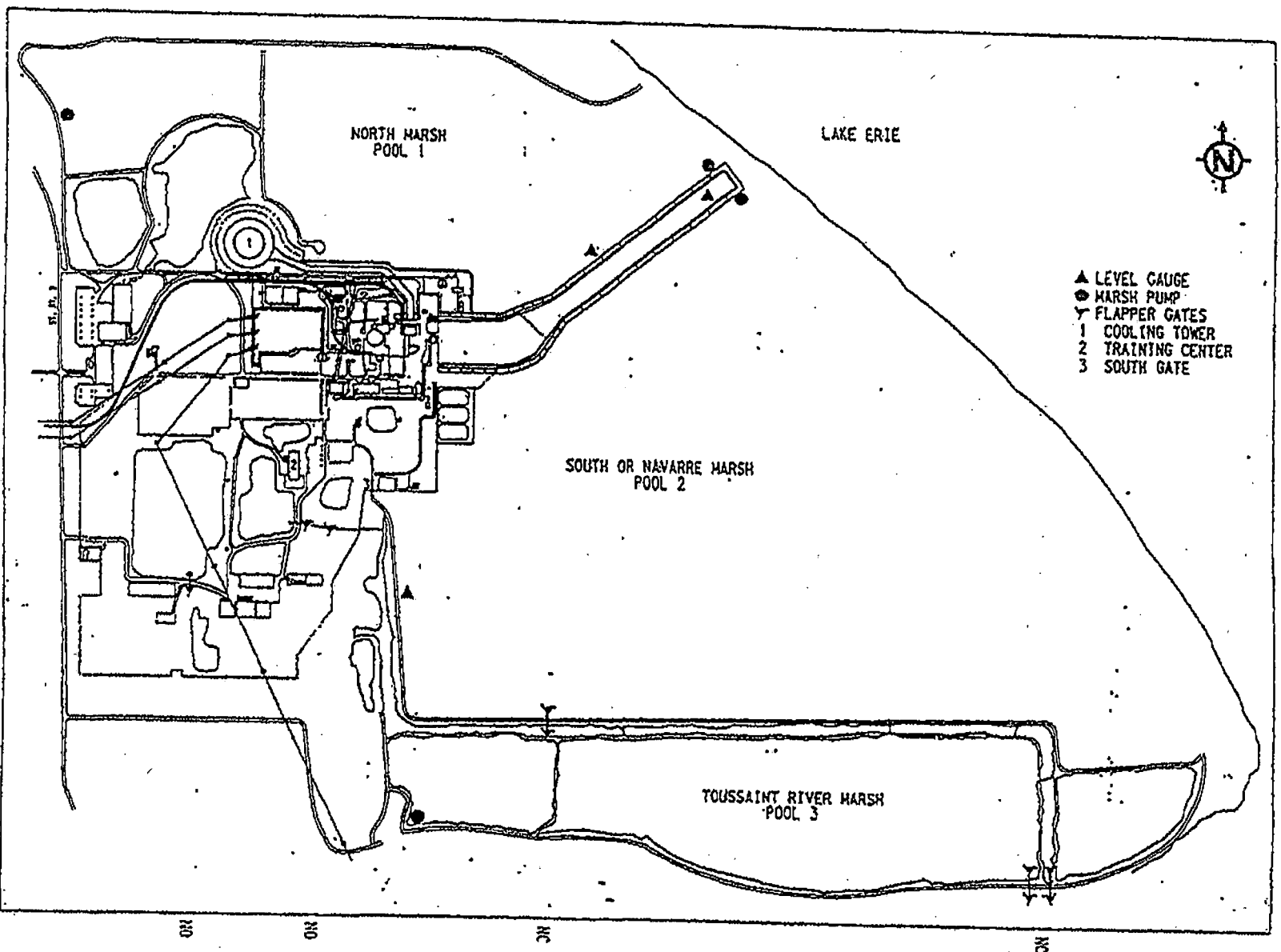
- a. 585' Main HAZWOPER General Spill Kit (located against the South wall)

B. OUTSIDE PROTECTED AREA - Spill Kits

I. Warehouse

- a. 585' General Spill Kit, Z-Building #3 (General Spill)
- b. 585' General Spill Kit, Warehouse Loading Dock (General Spill)

ATTACHMENT 3: SITE MAP OF FLAPPER GATES AND MARSH PUMPS
Page 1 of 1



NO = Normally Open
NC = Normally Closed

ATTACHMENT 4: DECONTAMINATION AREA ESTABLISHMENT AND METHODS

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CAUTION 1.0

No eating, drinking or smoking/chewing shall be allowed within the Hot or Warm Zones of the spill area.

1.0 Establishment of the Decontamination Area1.1 Location

- 1.1.1 The decon area shall be set up at the entry/exit to the Hot Zone but within the Warm Zone. The entry/exit point of the spill area shall be upwind of the spill. The decon area shall be set up on a level surface to prevent any decon liquids from spreading outside of the decon area.

1.2 Equipment

- 1.2.1 The decon area shall consist of plastic sheeting, decon pool(s), step off pad(s), and drum(s) for contaminated personal protective equipment (PPE).
- 1.2.2 Decon equipment that shall be available for use include the decon solution (see 1.2.3), hand sprayer(s) for decon solution, brushes, sponges, rags, clean PPE, and plastic bags for temporarily holding contaminated equipment prior to deconning. The materials for the decon area are maintained by Environmental personnel under the direction of the Supervisor - Nuclear Chemistry Services.
- 1.2.3 Decon solutions should react mildly to neutralize the contaminants from the spill. If the spilled material is unknown a general decon solution may be used. However, this should be tested on a small area to ensure that a worse condition is not created. Listed below are spilled materials with the suggested decon solution. Following this list is the actual content of each decon situation.

ATTACHMENT 4: DECONTAMINATION AREA ESTABLISHMENT AND METHODS

Page 2 of 5

A. Spilled Material

Decon
Solution
(Solution contents
listed on pg. 3 of 5)

Inorganic acids
Heavy metals (i.e. mercury, lead, cadmium, etc.)

A or E

Pesticides, fungicides, herbicides
Chlorinated phenols, dioxins, PCBs, Cyanides
Ammonia and other nonacidic inorganic wastes

B or E

Solvents and organic compounds (i.e.
trichloroethylene, chloroform, toluene, PBBs,
and PCBs

A, C or E

Oily, greasy unspecified wastes

C or E

Inorganic bases
Alkali and pH basic waste

D

General cleaning, removal of previous hazardous
decon solution (this method is preferred by EPA
and should suffice in most cases)

E

ATTACHMENT 4: DECONTAMINATION AREA ESTABLISHMENT AND METHODS

Page 3 of 5

B. Decon	
<u>Solution</u>	<u>Content</u>
A	Solution contains 5% sodium carbonate (Na_2CO_3) and 5% trisodium phosphate (Na_3PO_4). To 2 gallons water, add one pound of Na_2CO_3 (soda lime) and 1 lb. Na_3PO_4 . Stir until evenly mixed.
B	Solution contains 10% calcium hypochlorite ($\text{Ca}(\text{ClO})_2$). To 2 gallons water, add 2 lbs. $\text{Ca}(\text{ClO})_2$. Stir with wooden or plastic stirrer until evenly mixed.
C	Solution contains 5% trisodium phosphate (Na_3PO_4). To 2 gallons water, add 1 lb. of Na_3PO_4 . Stir until evenly mixed.

CAUTION D

Concentrated HCl is very corrosive.

- | | |
|---|---|
| D | Dilute solution of hydrochloric acid (HCl). To 2 gallons water, slowly add one-third (1/3) cup concentrated HCl. Stir with wood or plastic stirrer. |
| E | Solution contains dishwashing liquid or other household detergent such as Tide. |

1.3 Decon Area Activation

The Decon Area shall be activated upon determination that the spilled materials warrant use of decon solutions. The Decon Area shall be initially activated prior to entry of the first team and equipment into the Hot Zone of the spill area. The individual(s) working in the decon area must be HAZWOPER trained and as few as one person can make up the decon team.

ATTACHMENT 4: DECONTAMINATION AREA ESTABLISHMENT AND METHODS

Page 4 of 5

CAUTION 2.0

Contaminated personnel are prioritized as follows:

1. Damaged suits/PPE, internal contamination of person, injured personnel, or person with low air SCBA.
2. Person with least contaminated exterior surface of suit/PPE.
3. Person with most contaminated exterior surface of suite/PPE.

2.0 Hazardous Substances Decontamination Methods

2.1 Emergency Decontamination

- 2.1.1 Emergency decon consists of the immediate removal of contamination from personnel without using formal decon methods.
- 2.1.2 The primary concerns for emergency decon are:
 - a. Preventing loss of life
 - b. Preventing more severe injuries
 - c. Preventing heat stress which could lead to more severe heat-related conditions or injuries
- 2.1.3 For person with life-threatening condition, medically treat first until stabilized then decontaminate.
- 2.1.4 For high contaminant exposure/injury risk to person, decontaminate first then medically treat.
- 2.1.5 For slightly injured person and if the victim can wait a short time, decontaminate first then treat.

2.2 Primary Decontamination

- 2.2.1 Primary decontamination is the initial decon of personnel on the scene as they are exiting the Hot Zone of the spill area.
- 2.2.2 HAZWOPER trained personnel acting as the decon team shall use the same level of PPE as the personnel within the Hot Zone unless determined that a lower level of PPE is acceptable.
- 2.2.3 Personnel exiting the Hot Zone shall:
 - a. Place any contaminated equipment in a plastic bag for cleaning after decon of person.
 - b. Step into first decon pool.

ATTACHMENT 4: DECONTAMINATION AREA ESTABLISHMENT AND METHODS

Page 5 of 5

2.2.4 The decon team shall:

- a. Use decon solution and rub on suit from head to toe with sponge or cloth; use brush on boots only, rinse from head to toe with decon solution in hand sprayer.
- b. Have person being deconned lift one boot, rinse, and have person step into decon pool #2. Repeat with second foot.
- c. In decon pool #2, use a soap solution to remove the decon solution; follow same procedure as in 2.2.4.a above; rinse each boot last as person steps from pool onto clean plastic sheeting.

2.2.5 Person exiting the decon pools shall remove PPE in following order and place in designated containers:

- a. Outer boots
- b. Outer gloves
- c. Tape
- d. Suit with attached boot, roll inside towards outside
- e. Remove boot or suit with attached boot and place foot on clean step-off pad
- f. Repeat with other foot
- g. Remove inner gloves, if separate from suit

2.3 Secondary Decontamination

2.3.1 Secondary decon will consist of cleaning/deconning contaminated equipment, monitoring and inspecting PPE after primary decon to ensure it is free of contamination (except for disposable PPE).

2.3.2 If equipment/PPE is still contaminated, wash with the decon solution followed by the soap solution thoroughly rinse, and monitor/inspect for contamination.

2.4 Decontamination of Decon Personnel

2.4.1 Upon completion of decon of personnel exiting the Hot Zone, the decon personnel shall decon as follows:

- a. Use decon pool with least level of contamination or use new pool.
- b. Follow steps as outlined in 2.2.3 through 2.2.5.

ATTACHMENT 5: SPILL OR INCIDENTAL RELEASE CLEANUP PLAN

Page 1 of 7

- 1.0 This plan shall only be used if the spill or incidental release:
 - 1.1 Does not involve oil, chemicals, mixed waste, or hazardous waste of reportable quantities as determined by the Supervisor - Nuclear Chemistry Services.
 - 1.2 Does not pose a threat of personnel exposure exceeding PELs.
 - 1.3 Does not pose a threat of migration to the offsite environment.
 - 1.4 Does not occur under environmental or physical circumstances which may introduce reactive, dangerous or chemical by-products (i.e., conditions of extreme temperatures, fire, steam, or where incompatible chemicals may be reacted and liberate toxics).
 - 1.5 Can be timely mitigated so that no additional spreading or personnel contact occurs to ensure the release is not elevated from incidental spill status to a reportable spill event prior to mitigation (example: rain event can spread an oil spill off-site and cause a sheen on adjacent waterways.).
- 2.0 Use of appropriate PPE to prevent skin and eye contact shall be employed.
- 3.0 Initial response shall be to contain or minimize the spill. This may include:
 - 3.1 Use of dikes, booms, and absorbents or overpacks
 - 3.2 Covering nearby or other affected drains
 - 3.3 Posting the area to prevent spreading of the spill by personnel.
- 4.0 Ensure all containerized materials are labeled as follows:
 - 4.1 Non-hazardous Materials:
 - a. Date
 - b. Contents
 - c. Source
 - d. Contact person
 - e. Indicate "nonhazardous"

ATTACHMENT 5: SPILL OR INCIDENTAL RELEASE CLEANUP PLAN

Page 2 of 7

- 4.2 Hazardous and Non-hazardous Materials - Small amounts (typically less than 5 gallons):
- Date
 - Contents
 - Source
 - Contact person
 - Indicate "hazardous waste" (or "Non-hazardous") and consult NG-DB-00504, Hazardous and Non-Hazardous Chemical Waste Management, for appropriate handling and labeling.
- 5.0 Hazardous and Non-hazardous waste materials shall be handled in accordance with NG-DB-00504, Hazardous and Non-Hazardous Chemical Waste Management.
- 6.0 Hazardous material cleanup personnel (also other Non-hazardous, such as Oils) shall have received RCRA training in accordance with NG-DB-00504, Hazardous and Non-Hazardous Chemical Waste Management.
- 7.0 Cleanup and Recovery Response Matrix

The spill limit indicated is a mitigation benchmark only and not an absolute limit for Incidental Response criteria. Contact Nuclear Chemistry Services for guidance when quantities exceed the spill limits indicated.

WARNING 7.1

Contact with corrosive materials shall be avoided. Adequate ventilation shall be used; TLV is 2 ppm.

	<u>Description</u>	<u>Spill Limit</u>	<u>Response</u>
7.1	Battery Acid/ Electrolyte Solutions	<5 gallons	Containerize, label as "potentially hazardous waste" and remove to the CWSA or CWAA as appropriate. Up to 68 gallons spilled may trigger EPA RQ. Dependant upon specific acid spilled.
7.2	Component Cooling Water	< 100 gallons	Containerize, label as "potentially hazardous waste" and remove to the CWAA. At a 15 ppm solution of Hydrazine, 8000 gallons would trigger EPA notifications, however 8.7 ppb limit for NPDES permit.

ATTACHMENT 5: SPILL OR INCIDENTAL RELEASE CLEANUP PLAN

Page 3 of 7

	<u>Description</u>	<u>Spill Limit</u>	<u>Response</u>
7.3	Diesel Fuel or Gasoline	< 25 gallons and no intrusion offsite or into waterways	Use absorbent or excavate to remove visible traces of oil to extent feasible. Containerize, label as non-hazardous waste and remove to the CWSA or CWAA as appropriate. Contact Nuclear Chemistry Services for quantities exceeding 25 gallons. Ensure oil spill response is reported to Environmental specialist (or Oil Spill Coordinator).

WARNING 7.4

Although not listed as hazardous waste, Ethylene Glycol can be toxic. Adequate ventilation and skin/eye protection should be used, the TLV is 50 ppm.

7.4	Ethylene Glycol	< 25 gallons	Containerize, label as nonhazardous waste and remove to the CWSA or CWAA as appropriate.
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WARNING 7.5

Fyrquel EHC fluid can liberate toxic gases when exposed to steam or elevated temperatures.

7.5	Fyrquel EHC Fluid (at ambient temperature conditions)	< 55 gallons	Reclaim if possible. Containerize waste and label as "non hazardous" waste. Remove to CWSA or CWAA as appropriate. No RQ listed.
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ATTACHMENT 5: SPILL OR INCIDENTAL RELEASE CLEANUP PLAN

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NOTE 7.6

Safety may require air monitoring and special PPE prior to cleanup. DBBP-CHEM-2004 includes TLV information for specific common laboratory chemicals.

	<u>Description</u>	<u>Spill Limit</u>	<u>Response</u>
7.6	Laboratory Reagents, Ecolchem, Janitorial <ul style="list-style-type: none"> • Acids/Bases • Amines-Hydrazine, Ethanolamine, 3-Methoxypropylamine, 100% Morpholine 	< 1liter	<p>If no personnel hazard is present, containerize, label as "potentially hazardous waste" and remove to CWSA.</p> <p>Reference Step 5.5 of procedure body if greater than 1 liter to ensure RQ is not exceeded (example 34% Hydrazine RQ may be a volume as small as 1.34 liters).</p>

NOTE 7.7

If material is mixed with water, the solution is extremely caustic, a hazardous waste, and may require HAZWOPER response.

WARNING 7.7

Respiratory protection for dust generation should be used and contact with water should be avoided.

7.7	Lithium Hydroxide (caustic powders)	< 100 pounds	Containerize, label as non-hazardous waste and remove to the CWSA or CWAA as appropriate
7.8	Nalco 1338 Acti-Brom (Sodium Bromide)	N/A	Containerize, label as non-hazardous waste and remove to the CWSA or CWAA as appropriate
7.9	Nalco 1355 (1 – 5 % Sodium Nitrite Inhibitor)	< 5 gallons	Contains sodium nitrite, label as potentially hazardous waste and remove to the CWSA or CWAA as appropriate

ATTACHMENT 5: SPILL OR INCIDENTAL RELEASE CLEANUP PLAN

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	<u>Description</u>	<u>Spill Limit</u>	<u>Response</u>
7.10	Nalco Dynacool 1383	N/A	Containerize if more than 10 gallons have spilled or tank is ruptured. Label as non-hazardous waste. Flush residual spill amounts of water to drain.
7.11	Nalco 7330 (Isothiazolone biocide)	< 5 gallons	Material is a corrosive liquid biocide and requires handling as a pesticide. Absorb, under good ventilation, containerize, label as "potentially hazardous" and remove to CWSA.
7.12	Nalco 7338 (Glutaraldehyde biocide)	< 5 gallons	Material is a corrosive liquid biocide and requires handling as a pesticide. Absorb, under good ventilation, containerize, label as "potentially hazardous", and remove to CWSA.
7.13	Nalco 7408 (40% Sodium Bisulfite)	< 100 gallons	Containerize, label as "non-hazardous" waste and remove to the CWSA or CWAA as appropriate
7.14	Nalco 8256	N/A	Material is a corrosive amine but not RCRA hazardous. Containerize, label as "non-hazardous" waste and remove to the CWSA or CWAA as appropriate.
7.15	Nalco 8338 (Sodium Nitrate Inhibitor)	< 5 gallons	Contains sodium nitrite, label as potentially hazardous waste and remove to the CWSA or CWAA as appropriate
7.16	Nalco TRASAR TRAC 104 (5-10% Sodium Molybdate)	≤ 55 gallons and no intrusion offsite or into waterways	Material is a corrosive inhibitor but has no EPA RQ listed. If it becomes a waste, it may be a corrosive hazardous waste in concentrated solutions. Containerize, label as "potentially hazardous" waste and remove to the CWSA or CWAA as appropriate for waste determination (if pH > 12.5, then material is a D002 hazardous waste).

ATTACHMENT 5: SPILL OR INCIDENTAL RELEASE CLEANUP PLAN

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	<u>Description</u>	<u>Spill Limit</u>	<u>Response</u>
7.17	Oils (Non PCB)	< 25 gallons and no intrusion offsite or into waterways	Use absorbent or excavate to remove visible traces of oil to extent feasible. Containerize, label as non-hazardous waste and remove to the CWSA or CWAA as appropriate. Contact Nuclear Chemistry Services for quantities exceeding 25 gallons. Ensure oil spill response is reported to Environmental specialist (or Oil Spill Coordinator).

NOTE 7.18

Many hydraulic fluids are chlorinated which may render them as "hazardous wastes." The MSDS should be consulted to ensure non-halogen status.

7.18	Oils, Non-Halogenated Hydraulic Fluid	< 25 gallons	Use absorbent or excavate to remove visible traces of oil to extent feasible. Containerize, label as non-hazardous waste and remove to the CWSA or CWAA as appropriate.
7.19	Paints and Solvents	< 5 gallons	Containerize, label as "potentially hazardous waste" and remove to the CWAA or CWSA as appropriate

ATTACHMENT 5: SPILL OR INCIDENTAL RELEASE CLEANUP PLAN

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WARNING 7.20

Material shall not come in contact with other chemicals; especially acids which could react to cause liberation of lethal chlorine gas.

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|------|---------------------|---------------|---|
| 7.20 | Sodium Hypochlorite | < 25 gallons | Containerize, label as "non-hazardous" waste and remove to the CWSA or CWAA as appropriate. The 100 lb RQ for notifications would be triggered if greater than 82.5 gallons of a 12% solution or 66 gallons of a 15% solution were released off-site. |
| 7.21 | TPCW | < 100 gallons | Containerize, label as "non-hazardous" waste and remove to the CWSA or CWAA as appropriate. No RQs listed for TRASAR TRAC 104 or biocides Nalco 7330 or Nalco 7338. Spills up to contents of entire TPCW tank are not CERCLA reportable. For large spills ensure PELs are not exceeded. |

ATTACHMENT 6: PERSONNEL PROTECTIVE EQUIPMENT COMPATIBILITY CHART

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Personnel Protective EquipmentEffective Against

Butyl Gloves

Acids and Caustics
 Acetone
 Ammonia Gas
 Ammonia Hydroxide
 Benzene
 Cyclohexanone (e.g. GEM Gravure ink/thinner)
 EHC Fyrquel Hydraulic Fluid
 Hydrazine (Scav-Ox)
 Methyl Ethyl Ketone (MEK)
 Morpholine
 Nitrobenzene
 Nalco 7330
 Nalco 7338
 Nalco 8256
 Nalco 92UM001
 Nalco 352
 Nalco TRASAR TRAC 104
 Nitric Acid
 Sodium Bromide
 Sodium Hydroxide
 Sulfuric Acid

Nitrile/Neoprene

Acetic Acid
 Ammonia Gas
 Ammonium Hydroxide (29%)
 Butyl Acetate
 Cyclohexanol
 Diesel Fuel / Oil
 Ethanolamine (ETA)
 Ethyl Alcohol
 Gasoline
 Hydrazine (Scav-Ox)
 Hydrochloric Acid
 Hydrofluoric Acid
 Lithium Hydroxide
 Methoxypropylamine (MPA) - nitrile only
 Nalco 1355 (EDG Jacket Water)
 Nalco 1332
 Nalco 8256
 Nalco 8338
 Nalco 9216 - nitrile only
 Nalco TRASAR TRAC 104
 PCB
 Phenol
 Pre-Tect 9002 (2% DMA)
 Sulfuric Acid (25%)

ATTACHMENT 6: PERSONNEL PROTECTIVE EQUIPMENT COMPATIBILITY CHART

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Personnel Protective EquipmentEffective Against

Nitrile/Neoprene (Cont'd)

Sodium Bisulfite
 Sodium Bromide
 Sodium Hydroxide (50%)
 Sodium Hypochlorite
 TPCW Fluid

Silver Shield Gloves (to be used
 only over another glove,
 do NOT use alone)

Acids and Caustics
 (Anything except
 Chloroform
 Ethylamine
 Methylamine)

Chemrel Suit/CPV Suits
 Barricade Suits
 or equivalent

Acetone
 Ammonia Gas
 Ammonium Hydroxide (28.8%)
 Carbon Disulfide
 Chlorine Gas
 Diethylamine
 Diesel Fuel / Oil
 Ethanolamine (ETA)
 Formaldehyde
 Gasoline
 n-Hexane
 Hydrazine
 Hydrochloric Acid (37%)
 Hydrofluoric Acid (50%)
 Methanol
 Methoxypropylamine (MPA) -
 Methyl Bromide
 MEK (Methyl Ethyl Ketone)
 Mineral Spirits
 Morpholine
 Nalco 8256
 Nalco 7330
 Nalco 7338
 Nalco 92UM001
 Nalco 352
 Nalco CA-926C
 Nalco TRASAR TRAC 104
 Nitric Acid (70%)
 PCBs

ATTACHMENT 6: PERSONNEL PROTECTIVE EQUIPMENT COMPATIBILITY CHART

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Personnel Protective EquipmentEffective AgainstChemrel Suit/CPV Suits
Barricade Suits
or equivalent (Cont'd)Sodium Bisulfite
Sodium Bromide
Sodium Hydroxide (40%)
Sodium Hypochlorite
Sulfuric Acid (16-98%)
Toluene
TrichlorobenzeneSaranex Suit/Barricade Suits
Or equivalentChlorine Gas
Diesel Fuel / Oil
Gasoline
EHC Fyrquel Hydraulic Fluid
Hydrochloric Acid (37%)
Lithium Hydroxide
Methanol
Mineral Spirits
Nalco 1332
Nalco 1355
Nalco 8256
Nalco 8338
Nalco TRASAR TRAC 104
Nitric Acid (70%)
PCB
Sodium Bromide
Sodium Hydroxide (50%)
Sulfuric Acid (16-98%)
TPCW Fluid

Viton Gloves

1,1,1-Trichloroethane
1,2-Dichloroethane
Benzene
Carbon Tetrachloride
Chloroform
Cyclohexane
Methylamine
n-Hexane
Nalco 8256
PCBs
Sodium Bromide
Toluene
Trichloroethylene
Xylene

ATTACHMENT 7: ADMINISTRATIVE GUIDANCE FOR REVISING RA-EP-02850

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Purpose:

RA-EP-02850, Hazardous Chemical and Oil Spills, is considered an Emergency Plan (EP) Off-Normal Occurrence procedure. Emergency Plan Off-Normal Occurrence procedures govern response to situations which may become a classifiable event, and may be 'owned' by other plant organizations that provide operational and technical support. Chemistry provides technical support and ownership for RA-EP-02850, Hazardous Chemical and Oil Spills, and therefore generally performs procedure changes.

This Attachment of procedure change requirements is provided as an informational guidance document only to assist revision of RA-EP-02850 in accordance with Emergency Plan expectations and compliance. Requirements for changes to procedure RA-EP-02850 may be found in NG-SS-3001, Procedure Review and Approval; NG-NS-00500, Nuclear Emergency Response; and, NOP-LP-5002, Evaluation of Changes to Emergency Plans and Supporting Documents 10 CFR 50.54 (q).

To ensure Emergency Plan concerns are identified for RA-EP-02850 procedure changes, the following procedure change actions are required:

NOP-SS-3001

- Perform procedure alteration in accordance with procedure change requirements of NOP-SS-3001, ensuring additional reviews as required for NOP-LP-5002 and NG-NS-00500 for performing 10 CFR 50.54(q) reviews as specified below.
- All revisions to RA-EP-02850, even corrections, shall be reviewed by Emergency Preparedness for cross-comment review.
- All revisions to RA-EP-02850, even corrections, require a 50.54(q) applicability review, therefore a 50.59 Regulatory Applicability Determination (RAD) review will be required to be performed. RA-EP-02850 50.59 reviews (approvals) shall be performed by EP designated personnel authorized or qualified to perform Emergency Preparedness 50.59 RAD / 50.54(q) review and approval to ensure unique requirements for 50.54(q) review for all EP procedures is identified and performed.
- The Independent Qualified Review for changes to RA-EP-02850 should be performed by EP designated personnel.
- Because a procedure correction does not require a 10 CFR 50.59 Regulatory Applicability Review (RAD), performance of the RAD and 10 CFR 50.54(q) review for a correction is supplemental to normal procedure processing guidance and requirements of NOP-SS-3001.

ATTACHMENT 7: ADMINISTRATIVE GUIDANCE FOR REVISING RA-EP-02850

Page 2 of 2

NOP-LP-5002

- NOP-LP-5002, Attachment 1, provides that reviews for other programs also need to be performed. Performance of 10 CFR 50.59 Regulatory Applicability Determination (RAD) for Environmental Compliance Program requirements should be performed by Chemistry and approved by Emergency Preparedness. Associated 10.54(q) screen or evaluation will be performed by Emergency Preparedness.

NG-NS-00500

- Off-Normal Occurrence procedures are considered DBNPS Emergency Plan Related or Supporting Documents which require a 10 CFR 50.54 (q) Review to be completed in accordance with NOP-LP-5002, Evaluation of Changes to Emergency Plans and Support Documents 10 CFR 50.54 (q). Emergency Preparedness group performs the review and may require up to 8 weeks to complete the review.
- IF the changes decrease or may decrease the level of effectiveness of the Emergency Plan,
THEN the changes cannot be implemented without NRC approval.
- IF changes affect other departments (i.e. changes in actions or responsibilities outside Chemistry),
THEN NG-NS-00500 may require Emergency Response section to coordinate the resolution and incorporation of the procedure changes so each affected department can provide technical assistance to support the revisions.
- The procedure owner designates performance of annual reviews to ensure compliance with regulatory standards, functional adequacy, and technical accuracy.
IF performance of a significant or simple change is documented on the Periodic Review Form, DBEP-057,
THEN the change may satisfy the annual review requirement. The effective date of the procedure may be used to establish the next annual review date.

COMMITMENTS

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<u>Section</u>	<u>Reference</u>	<u>Comments</u>
6.2.11, 6.2.12	O 09590	Operators (Shift Manager or Unit Supervisor) shall secure/isolate Control Room Ventilation System and start the Control Room Emergency Ventilation System (with fresh air damper closed) in the event of a toxic gas release. If fumes from a toxic liquid release are detected in the Control Room atmosphere, the Shift Manager shall secure the fresh air damper to the Control Room Ventilation System.
Entire Procedure	NUREG 1.33	NUREG 1.33, Appendix A, F.18 states that typical safety-related activities, i.e. expected transients, should be covered by procedures. Specifically, these procedures are for combating emergencies and other significant events.