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PNP 2016-035

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10 CFR 50.4(b)(5)

ATTN: Document Control Desk
Director, Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Revision to Big Rock Point Emergency Plan Implementing Procedure

Big Rock Point
Dockets 50-155 and 72-043
License No. DPR-6

Dear Sir or Madam:

In accordance with 10 CFR 50.4(b)(5), enclosed is a revision to Big Rock Point (BRP) Independent Spent Fuel Storage Installation (ISFSI) Emergency Plan Implementing Procedure Volume 35A, IEPIP-08, "Emergency Preparedness Drills, Exercises and Equipment Checks, Revision 10, and Volume 35A-TOC, Table of Contents, Revision 26. The changes were made in accordance with 10 CFR 50.54(q), and do not decrease the effectiveness of the Emergency Plan.

This letter contains no new commitments and no revisions to existing commitments.

A handwritten signature in black ink, appearing to read "Barbara Dots for".

JAH/bed

Attachment 1: Volume 35A, IEPIP-08, Revision 10
Volume 35A-TOC, Table of Contents, Revisions 26


CC Administrator, Region III, USNRC

AX45
NMSS24
NMSS26

ATTACHMENT 1

Big Rock Point ISFSI

Volume 35A, IEPIP-08, Revision 10
Volume 35A-TOC, Table of Contents, Revision 26

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BIG ROCK POINT
PROCEDURE APPROVAL AND AUTHORIZATION

Procedure No. VOLUME 35A, IEP-08 Rev No. 10

Procedure Title: EMERGENCY PREPAREDNESS DRILLS, EXERCISES AND
EQUIPMENT CHECKS

CURRENT REVISION STATUS

Author Lawrence R. Potter Date 04/11/16 Quality Review Form No. 004-16

APPLICABILITY ISSUE HISTORY

Revision No. 9 Date 06/29/15 Quality Review Form No. 018-15

Approved for use

Procedure Sponsor/Designate \s\ Lawrence R. Potter Date 04/11/16

Authorized Period of Use June 29, 2015 through June 29, 2017

**BEFORE USING THIS PROCEDURE FOR WORK ACTIVITIES, VERIFY WITH
THE RESPECTIVE PROCEDURE CONTROLLING DEPARTMENT THERE ARE
NO OUTSTANDING TEMPORARY CHANGES**

When applicable:

PROCEDURE IMPLEMENTATION HISTORY

Reviewed for System or Component Operability

Performed by		Completed/Reviewed by		Method of Verification
Title		Title		
_____	_____	_____	_____	<input type="checkbox"/> Functional Test <input type="checkbox"/> Physical Inspection <input type="checkbox"/> Administrative Review
Date	Time	Date	Time	

AMMS WORK ORDER NO. (if applicable) _____



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1.0 PURPOSE

Emergency drills and exercises are conducted to ensure the capability of the Emergency Response Organization (ERO) to execute the Independent Spent Fuel Storage Installation (ISFSI) Emergency Plan (IEP) and the ISFSI Emergency Plan Implementing Procedures (IEPIPs).

Periodic drills and exercises are conducted to evaluate emergency response capabilities and to develop and maintain key skills. Some drills may be included as a portion of the radiological emergency preparedness exercise.

2.0 REFERENCES

- [1] Big Rock Point Volume 35, Independent Spent Fuel Storage Installation (ISFSI) Emergency Plan

3.0 DEFINITIONS

[1] DRILLS


Drills are supervised instruction periods designed to develop and maintain skills in a particular operation.

[2] ISFSI EMERGENCY PLAN MEDICAL DRILLS

A medical emergency drill involving a simulated contaminated individual with provisions for participation by the local support service agencies (i.e., ambulance and off-site medical treatment facility) will be conducted annually.

[3] RADIOLOGICAL MONITORING DRILLS

A site radiological monitoring drill to evaluate the response to emergency radiation protection situations will be conducted annually. These radiological drills can be run in conjunction with the medical drills, emergency drills or as tabletop drills.

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[4] TESTS

Tests are conducted to ensure equipment operates as intended and that specific emergency response information is correct (i.e., telephone numbers).

A communication test with the Michigan State Police, Emergency Manager Homeland Security (EMHSD) – State Emergency Operations Center (SEOC), the NRC, and off-site support agencies will be performed quarterly.

[5] EXERCISES

Exercises are events that test the integrated capability and major portions of the basic elements existing within the IEP and emergency organization.

A radiological emergency preparedness exercise will be conducted biennially. The exercise will include the mobilization of utility personnel to verify the capability to effectively respond to an accident. Performance will be evaluated and critiqued in order to judge the effectiveness of emergency planning elements.

4.0 RESPONSIBILITIES

4.1 INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI) SUPERVISOR

The ISFSI Supervisor shall ensure quarterly communication tests are completed as described in Attachment 9.1, Quarterly Communication Test.


4.2 MANAGER, ENTERGY NUCLEAR PALISADES, LLC (ENP) EMERGENCY PLANNING

The Manager, ENP Emergency Planning, shall ensure the annual medical drills, radiological monitoring drills, and the biennial exercise are completed as described in Attachment 9.2, Annual Drills and Biennial Exercise

5.0 DETAILS

5.1 COMMUNICATION TEST

The ISFSI Supervisor shall perform the quarterly communication test as described in Attachment 9.1, Quarterly Communication Test.

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**5.2 EMERGENCY MEDICAL DRILLS, RADIOLOGICAL MONITORING DRILLS,
AND EMERGENCY PREPAREDNESS EXERCISES**

The Big Rock Site General Manager, or designate shall review the quarterly communication test as described in Attachment 9.1, Quarterly Communication Test and ensure the annual medical drills, radiological monitoring drills, and the biennial exercise are completed as described in Attachment 9.2, Annual Drills and Biennial Exercise.

6.0 INTERFACES

[1] Big Rock Point Volume 34A-03, Records Management.

7.0 RECORDS

[1] Any attachments generated in the performance of this procedure, shall be maintained in accordance with Big Rock Point Volume 34A-03, Records Management.

**8.0 OBLIGATIONS AND COMMITMENTS IMPLEMENTED BY THE
PROCEDURE**


BRP Volume 35, Independent Spent Fuel Storage Installation (ISFSI)
Emergency Plan, Section 5.8[2].

9.0 ATTACHMENTS

9.1 QUARTERLY COMMUNICATION TEST

9.2 ANNUAL DRILLS AND BIENNIAL EXERCISE

9.3 BIG ROCK POINT DRILL RECORD PACKAGE TURNOVER CHECKLIST

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ATTACHMENT 9.1
QUARTERLY COMMUNICATION TEST
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RESPONSIBILITIES


The ISFSI Supervisor, or designate shall ensure the quarterly communication tests are completed as follows:

NOTE: Quarterly: Occurring within the first week of the calendar quarter (Jan-Mar; Apr-Jun; Jul-Sept; Oct-Dec) plus or minus one week.

ACTIONS

1. _____ Perform the designated checks. System failures or incorrect telephone numbers should be noted in the comments section. Corrections are made by the ISFSI Supervisor and noted in the comments section of this attachment.
2. _____ The dedicated telephone lines shall be tested by activating the telephone and transmitting a simulated message, such as:

"This is the Big Rock Point ISFSI testing its emergency communications system. This message is to verify that the system is working. This is not an emergency, it is only a test."
3. _____ The commercial and site telephones should be tested by dialing the appropriate number and transmitting a simulated message (see Action 2, above).
4. _____ After completing the tests, the ISFSI Supervisor signs the bottom of this attachment and forwards it to the Site General Manager, or designate for review.
5. _____ The Big Rock Site General Manager, or designate shall verify the quarterly telephone number verification checklist against IEPIP-02, Attachment 9.2.2, Emergency Notifications. If the telephone numbers have changed as indicated in the quarterly check, the Site General Manager, or designate shall initiate a change to IEPIP-02, Attachment 9.2.2, Emergency Notifications, within 14 working days after the completion of this attachment.
6. _____ Completed attachments shall be filed in the Big Rock Point Document Control after review in accordance with Big Rock Point Volume 34A-03, Records Management.

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ATTACHMENT 9.1
QUARTERLY COMMUNICATION TEST
Page 2 of 3

EMERGENCY SUPPORT CENTER (ESC)

1. Nuclear Regulatory Commission (NRC)

Verify dial tone on NRC phone located in Central Alarm Station (CAS)

Dial Tone? Yes ____ No ____

Date _____ Time _____

If no dial tone, report trouble to NRC Operations Center (301-816-5100)

Name of Person Contacted _____ Date _____ Time _____

2. 911 – Charlevoix, Cheboygan, Emmet County Emergency Dispatch

Dial 911 and transmit "test" message.

Name of Person Contacted _____ Date _____ Time _____

3. Michigan State Police, State Emergency Operations Center (SEOC)

Dial (517) 241-8000 and transmit "test" message.

Alternate number is (517) 334-6223.

Is number working? Yes ____ No ____


List any alternate numbers called _____

Name of Person Contacted _____ Date _____ Time _____

4. Michigan State Police – Petoskey Post

Dial 1-855-677-9619 and transmit "test" message.

Name of Person Contacted _____ Date _____ Time _____

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ATTACHMENT 9.1
QUARTERLY COMMUNICATION TEST
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5. On-Call Emergency Director (ED)

Verify and call ED as listed on CAS board. Transmit "test" message

Name of Person Contacted _____ Date _____ Time _____

Verify home and office numbers and operability. Are numbers working? Yes ___ No ___

Office Phone Number _____ Home Phone Number _____

6. Site General Manager – Big Rock

Dial phone number (269) 764-2856 and transmit "test" message.

Name of Person Contacted _____ Date _____ Time _____

Verify home and office numbers and operability. Are numbers working? Yes ___ No ___

Cell Phone Number _____ Home Phone Number _____

7. Chief Nuclear Officer (CNO)

Dial Office phone¹ number (601) 368-5440 and transmit "test" message.

Name of Person Contacted _____ Date _____ Time _____

Verify home and cell numbers and operability. Are numbers working? Yes ___ No ___

Cell Phone Number _____ Home Phone Number _____

8. ANI – American Nuclear Insurers

Dial (877) 680-2644 and transmit "test" message.

Name of Person Contacted _____ Date _____ Time _____


Performed by: _____ Date: _____

Comments: _____

Resolution: _____

Reviewed by: _____ Date: _____

¹ If Communication test is performed during non-working hours, note and skip test of CNO

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ATTACHMENT 9.2
ANNUAL DRILLS AND BIENNIAL EXERCISE
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RESPONSIBILITIES


The Manager, ENP Emergency Planning shall ensure drills and exercises are developed, performed, evaluated and documented.

ACTIONS

The following actions should be performed as needed for the drill or exercise being developed:

1. Drill/Exercise Preparation

- _____ a. Schedule drill/exercise, coordinating date with plant management and involved off-site agencies.
- _____ b. Determine the type of drill/exercise and establish appropriate objectives.
- _____ c. Coordinate development of scenario.
- _____ d. Assign drill/exercise players and controllers.
- _____ e. Prepare draft scenario package including:
 - drill/exercise objectives
 - sequence of events
 - evaluation forms
- _____ f. Coordinate review of draft scenario package and resolve comments.
- _____ g. Prepare final scenario package.

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ATTACHMENT 9.2
ANNUAL DRILLS AND BIENNIAL EXERCISE
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2. Drill/Exercise Performance

- _____ a. Distribute scenario packages to controllers.
- _____ b. Determine what will be allowed to be prestaged and/or simulated.
- _____ c. Conduct controller training/briefing.
- _____ d. Conduct player briefing.
- _____ e. Conduct drill/exercise.

3. Drill/Exercise Critique and Evaluation

- _____ a. Distribute evaluation forms to be completed by players and controllers.
- _____ b. Conduct and document a critique with players and controllers.

4. Drill/Exercise Reporting and Tracking

- _____ a. Determine what corrective actions are necessary to resolve drill/exercise weaknesses or areas for improvement.
- _____ b. Write a summary of the drill/exercise and critique results.
- _____ c. Develop an action plan to address drill/exercise weaknesses and/or areas for improvement.

5. Drill/Exercise Record Keeping

- _____ a. Send drill/exercise documentation to the Big Rock Point Document Control in accordance with Big Rock Point Volume 34A-03, Records Management.

NOTE: Typical documents to include in drill/exercise documentation are scenario package, player and controller critique/evaluation forms, attendance sheets and executive summary of drill performance, including reference to any Condition Reports resulting from the drill/exercise.



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EMERGENCY PLAN IMPLEMENTING PROCEDURE 35A-08 -
EMERGENCY PREPAREDNESS DRILLS, EXERCISES AND EQUIPMENT CHECKS**

**ATTACHMENT 9.3
BIG ROCK POINT
DRILL RECORD PACKAGE TURNOVER CHECKLIST
Page 1 of 1**

Event _____

Scope/Objectives _____

Scenario Time Line _____

Notification Forms _____

Summary Report _____

Corrective Actions _____

Critique Items _____

Feedback Forms _____

Evaluator Checklist _____

Attendance Sheet Copies
(Include Player/Controller List) _____

Miscellaneous Information
(Include all logs, completed forms, etc) _____

IEPIP 35A-08 Checklists _____

UFI# _____

Comments: _____

Completed By: _____

Reviewed By: _____

Palisades EP Manager