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SUBJECT: Requests rev to PVNGS Emergency Plan rev 19. Emergency Plan
 revision would result in two less RP positions immediately
 available during emergencies. Revised pages encl.

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102-04178-JML/SAB/RKB
September 8, 1998

U.S. Nuclear Regulatory Commission
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Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Request for Revision to PVNGS Emergency Plan**

In accordance with the requirements of 10 CFR 50.54(q) and 10 CFR 50.4, Arizona Public Service Company (APS) hereby requests a revision to the PVNGS Emergency Plan, Revision 19. The requested revision addresses reducing the Radiation Protection (RP) related Emergency Plan on-shift staffing positions from the current ten individuals to eight individuals, while increasing the number of 60 to 120 minute augmentation positions from four to six. This proposed revision of the PVNGS Emergency Plan complies with the requirements of 10 CFR 50.47(b)(2), 10 CFR 50 Appendix E, and the staffing levels required per NUREG-0654, Table B-1, "Minimum Staffing Requirements For NRC Licensees For Nuclear Power Plant Emergencies."

Since the requested Emergency Plan revision would result in two less RP positions immediately available during emergencies, APS believes the proposed revision constitutes a reduction in the overall effectiveness of the Emergency Plan from what currently exists. However, APS believes the reduction is minimal since the requested revision maintains compliance with the staffing levels required by NUREG-0654.

APS proposes to reduce the RP-related Emergency Plan on-shift staffing positions from the current ten individuals to eight individuals and continue to maintain adequate staffing to perform all necessary Emergency Plan tasks. APS proposes to achieve this in three ways, 1) by re-assigning responsibility for tasks that do not require full RP Technician qualifications to RP task-qualified personnel already on-shift; 2) by modifying the responsibilities of those personnel assigned Emergency Plan tasks which require full RP Technician qualifications; and 3) by shifting two RP Technician Emergency Plan positions from being on-shift for immediate availability to being available within the 1 to 2 hour augmentation time. The description and justification of the changes proposed in the requested revision are provided in Enclosure 1. Enclosure 2 provides revised pages to the PVNGS Emergency Plan.

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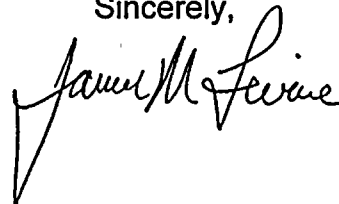
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Request for Revision to PVNGS Emergency Plan
Page 2

By implementing the proposed revision to the PVNGS Emergency Plan, APS will continue to provide adequate Emergency Plan staffing to reasonably assure that the health and safety of the public will be adequately protected and yet gain significant operational flexibility to manage personnel resources during off-normal hours.

This request is being submitted for consideration under the provisions of NRC Administrative Letter 95-02: "Cost Beneficial Licensing Actions [CBLA]." APS expects to realize approximately \$665,000 in annual savings from the implementation of this Emergency Plan revision. Over the remaining life of the plant that savings is more than \$16,652,000.

The justification provided in Enclosure 1 strongly supports the approval of the proposed change as it demonstrates the PVNGS Emergency Plan would continue to comply with regulatory requirements. Based on the substantial cost benefit of this change, APS requests NRC staff review and approval by February 28, 1999. To facilitate this, APS would welcome an opportunity to meet with the NRC staff regarding this Emergency Plan request. Please contact Mr. Scott Bauer at (602) 393-5978 if you would like to schedule a meeting or if you have any questions. This letter does not make any commitments to the NRC.

Sincerely,



JML/SAB/RKB/rjh

Enclosures:

1. Description and Justification of Proposed Changes to the PVNGS Emergency Plan
2. PVNGS Emergency Plan Revised Pages for Proposed Change

cc: E. W. Merschoff
M. B. Fields
J. H. Moorman
T. H. Andrews

Enclosure 1

**Description and Justification of Proposed
Changes to the PVNGS Emergency Plan**

Background:

NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Table B-1, "Minimum Staffing Requirements For NRC Licensees For Nuclear Power Plant Emergencies," specifies three response times for having sufficient qualified staff available. These are 1) On-Shift, 2) 30 minute, and 3) 60 minute. Because of the site's remote location, PVNGS requested, in Revision 13 to the Emergency Plan (reference 1), to utilize up to a 120 minute augmentation response time in lieu of the 60 minute response time specified by NUREG-0654, during off-normal hours. To offset the delayed response of Emergency Plan augmentation personnel, APS committed to combining the first two response columns, "On-Shift" and "30 minute," to determine the minimum on-shift staffing requirements for PVNGS. NRC approval was granted for Revision 13 (reference 2). Subsequent revisions to the Emergency Plan have made only minor changes in the RP-related functions since Revision 13.

Adequate on-shift staffing is verified per Station procedure 75RP-9RP10, "Conduct of RP Operations," Section 3.0, which requires that the Radiation Protection Section Leader ensure the number of on-shift Emergency Plan qualified RP-related personnel are logged into the Unit 2 RP Log.

The minimum Health Physics-related Emergency Plan staffing requirements from Table B-1 of NUREG-0654 are provided in Attachment 1 to this enclosure. PVNGS' Emergency Plan, Revision 19, requires ten Health Physics-related positions on-shift, and an additional four augmentation positions available within 60 to 120 minutes. The current PVNGS Health Physics-related Emergency Plan staffing is provided in Attachment 2.

Additionally, Table B-1 of NUREG-0654 provides specific guidance for the required level of expertise of persons filling certain positions. Specifically, Table B-1 requires the following:

- Off-site dose assessment position to be filled by an individual possessing Senior Health Physics expertise.
- In-Plant surveys position to be filled by a qualified Health Physics Technician, and
- Protective Actions (In-Plant) position to be filled by a qualified Health Physics Technician.

The remaining Health Physics-related positions specified in NUREG-0654 have no specific requirements for level of expertise. NUREG/CR-5569, "Health Physics Positions Database," May 1992, HPPOS-238, "Health Physics Position on Task Qualification of HP technicians," was referenced for further guidance regarding the qualification requirements for individuals performing

independent Emergency Plan related Health Physics tasks. NUREG/CR-5569, HPPOS 238 states that "Health Physics Technicians (HP technicians) may independently perform specific tasks or job assignments if they meet the required prerequisites and complete the required task qualifications of their plant training programs." HPPOS-238 further states that "there are certain tasks and job assignments, however, that require in-depth knowledge and can only be performed by fully qualified ANSI technicians. The following are areas of Emergency Preparedness in which a non-fully qualified HP technician should not be authorized to perform (without supervision): 1) lead emergency search and rescue teams, 2) lead environmental monitoring teams, or 3) off-site dose assessment." This guidance provides additional bases for the justification of the changes described below.

Proposed Change:

The current Health Physics-related Emergency Plan on-shift staffing of ten positions exceeds the minimum staffing requirements presented in Table B-1 of NUREG-0654, for "On-shift" plus "30 minute" positions. APS proposes to revise the Emergency Plan staffing of Health Physics-related positions from ten to eight, while increasing the number of 60 to 120 minute augmentation positions from four to six, to allow greater operational flexibility in managing personnel resources during off-normal hours. The proposed changes maintain adequate staffing levels in compliance with NUREG-0654. In addition, APS' commitment from Revision 13 of the Emergency Plan is maintained since the excess personnel immediately available to response to an emergency by combining the on-shift plus 30 minute staffing levels, provides significant emergency response capability to off-set the additional response time for augmentation personnel to arrive.

APS proposes to revise the PVNGS Emergency Plan as follows: 1) Redefine the role of the Radiation Protection Monitor (RPM) position exclusively for off-site dose assessment; 2) Redefine the role of the current Radiation Monitoring Technician (RMT) position to perform the in-plant survey function; 3) Assign the second in-plant survey function to either a second RMT, task qualified to perform in-plant surveys, or a qualified RP Technician; 4) Establish an E-Plan Driver position to perform driving functions in support of off-site surveys; 5) Reassign the on-site (Out of Plant) survey position to a task-qualified individual outside the RP organization, that is on-shift but does not currently have Emergency Plan responsibilities; and 6) Reassign the remaining two Radiation Protection Technician positions, which are over-compliment, from on-shift positions to 60 to 120 minute augmentation positions, bringing the total of 60 to 120 minute augmentation positions to six Radiation Protection Technicians. Attachment 3 provides a comparison of current PVNGS Emergency Plan RP-related staffing and the proposed staffing changes versus NUREG-0654, Table B-1, requirements. Attachment 4 provides the proposed changes to Table 1 of the PVNGS Emergency Plan.

Description/Justification:

Off-site Dose Assessment: The role of the RPM is redefined to focus on off-site dose assessment. Currently, the RPM and a RMT combine to fill the required position for the off-site dose assessment function. NUREG-0654 requires that this position have "Senior Health Physics (HP) expertise." NUREG/CR-5569, HPPOS-238, "Health Physics Position on Task Qualification of HP technicians," states "as examples in the area of Emergency Preparedness, a non-fully qualified HPT should not be authorized to: ...3) perform offsite dose assessment." This change proposes reassigning this Emergency Plan task solely to the Radiation Protection Department. The on-shift RPM will fill this position exclusively. The RPM is an ANSI 3.1 Senior Health Physics Technician who will be fully qualified to independently perform off-site dose assessment.

This functional assignment meets the requirements of NUREG-0654, Table B-1, PVNGS UFSAR Chapter 18.III.A, Table 2, "Minimum Staffing Requirements for NRC Licensees for Nuclear Power Plant Emergencies," and NUREG/CR-5569, HPPOS-238. This change modifies the PVNGS on-shift Emergency Plan organization by assigning the off-site dose assessment position exclusively to a fully qualified RP Technician with Senior Health Physics (HP) expertise.

In-plant Surveys: The current role of the RMT is redefined to fill one of the on-shift in-plant surveys positions. The second on-shift in-plant survey position will be assigned to either one other task-qualified RMT or one fully qualified Radiation Protection Technician.

Currently, RP Technicians fill both required on-shift in-plant surveys positions. NUREG/CR-5569, HPPOS-238, states "Health Physics Technicians [HPTs] are allowed to perform (without supervision) specific tasks or job assignments (i.e., radiation surveys, swipe surveys, air samples, and survey meter calibrations) if they meet the required prerequisites and complete the required task qualifications of their plant training program." This change would identify these two positions to be filled by either two task-qualified RMTs or one task-qualified RMT and one fully qualified Radiation Protection Technician.

This change complies with NUREG-0654 and NUREG/CR-5569. Emergency response roles continue to be clearly defined and are staffed by personnel qualified to perform their functions independently.

Off-Site Survey Team: Currently, the two NUREG-0654 required on-shift positions for off-site surveys responsibilities in the Radiological Field Assessment Team (RFAT) are filled by RP Technicians. Based on drills and actual events, experience has shown that only one RFAT team is needed to adequately perform this function during the first 120 minutes of an event.

Since NUREG-0654 does not require specific expertise for these positions, and the guidance provided in NUREG/CR-5569, HPPOS 238, clarifies that only the off-site survey team leader needs to possess Health Physics expertise, APS proposes to establish an "E-Plan Driver" position. This change reassigns one position from the RP Department and clarifies that an off-site survey team will consist of one RP Technician and one E-Plan Driver. Note that the current Emergency Plan, Revision 19, Section 4.2.1.13, "Survey Team," states that "A Survey Team is formed upon request from the Radiation Protection Monitor. The team performs radiological monitoring activities. At least one member of the team is a Radiation Protection Technician. The Survey Team reports to the Radiation Protection Monitor."

The E-Plan Driver position would be assigned from an available site organization that provides 24-hour on-site personnel and who are not currently assigned any Emergency Response staff functions.

This emergency plan function replaces one RP Technician with a task qualified E-Plan Driver position, and therefore, maintains the overall on-shift off-site survey team staffing level at two positions; one E-Plan Driver and One RP Technician. This change complies with the requirements described in NUREG-0654 and NUREG/CR-5569. Emergency response roles continue to be clearly defined and are staffed by personnel properly qualified to perform their functions independently.

On-site (Out of Plant) Surveys: Currently, a RP Technician fills the required on-shift position for the on-site (out of plant) surveys function. This position would be reassigned from the RP Department to a RP task-qualified person from another site organization. This proposal is consistent with regulatory guidance in that NUREG-0654 does not require that this position be filled by a RP Technician. Adopting this proposed change will permit future staffing flexibility while maintaining compliance with NUREG-0654 staffing requirements.

The individual assigned to the on-shift on-site (Out of Plant) surveys function will come from an available site organization that provides 24-hour on-site personnel and will be someone who is not currently assigned any Emergency Response staff functions.

Shifting Two Radiation Protection Technicians from On-Shift Availability to 60 to 120 Minute Augmented Availability: This change will reduce by two, the number of RP-related positions required to be on-shift at all times for Emergency Plan purposes and will increase the number of RP Technicians required to be available for 60 to 120 minute Emergency Plan staff augmentation by two. Therefore, the overall number of RP-related positions required to be available to support emergencies is unchanged. Continuing to maintain personnel on-shift to fill the additional two RP-related positions exceeds Emergency Plan staffing requirements of NUREG-0654 and is not

justified. APS' commitment is to maintain on-shift Emergency Plan staffing at the "on-shift" plus "30 minute" staffing level from NUREG-0654. Shifting the PVNGS RP-related staffing positions from ten to eight on-shift positions, and from four to six 60 to 120 minute augmentation positions maintains an Emergency Plan staffing balance that allows for flexibility in managing personnel resources during off-normal hours and continues to satisfy the requirements of NUREG-0654, 10 CFR 50.47 and 10 CFR 50, Appendix E.

Conclusion:

Implementing the proposed staffing changes to the PVNGS Emergency Plan, although a reduction in the overall number of RP-related Emergency Plan personnel immediately available in the event of a site emergency, will continue to provide reasonable assurance that the health and safety of the public will be adequately protected. This change maintains compliance with the staffing requirements of NUREG-0654, 10 CFR 50.47 and 10 CFR 50, Appendix E. In addition, the Emergency Plan, Revision 13, commitment to maintain on-shift Emergency Plan staffing at the "on-shift" plus "30 minute" staffing levels specified in NUREG-0654 is maintained.

Implementation of the proposed revision to the Emergency Plan will allow APS greater flexibility in managing its personnel resources during off-normal hours, while maintaining adequate staffing for immediate emergency response. On-shift Radiation Protection Emergency Plan staffing levels would meet, but no longer exceed, regulatory requirements. In addition, APS' cost benefits are substantial. APS expects cost-savings in excess of \$16,652,000 over the remaining operating life of the plant by implementing this proposed revision to the PVNGS Emergency Plan.

- References:
- (1) Letter 102-02733, dated November 16, 1993, from W. F. Conway, APS, to USNRC.
 - (2) Letter dated February 25, 1994, from R. J. Pate, USNRC, to W. F. Conway, APS.

ATTACHMENT 1 NUREG-0654 Table B-1 Core Data

NUREG-0654, Table B-1 (Excerpt)

Health Physics Related Tasks

Major Functional Area	Position Title or Expertise	Capability for Additions	
		On-Shift + 30 min	60 min
Offsite dose assessment	Senior health physics (HP) expertise	1	--
Off-site surveys		2	2
Onsite (out-of-plant)		1	1
In Plant surveys	HP technicians	2	1
Protective Actions (In-Plant)	HP technicians	2 (2**)	2
Radiation protection:			
a) Access control			
b) HP Coverage for repair, corrective actions, search and rescue first-aid, & fire-fighting			
c) Personnel monitoring			
d) Dosimetry			
Total		8	6

** May be provided by shift personnel assigned other functions.

ATTACHMENT 2 "CURRENT" PVNGS E-PLAN TABLE 1

Table 1 – Minimum Staffing Requirements for PVNGS for Nuclear Power Plant Emergencies			
Notification of Unusual Event		Alert, Site Area Emergency, General Emergency	
Personnel	Time	Personnel	Time
Control Room		Control Room	
Shift Supervisor 1	Immediately	Shift Supervisor 1	Immediately
Control Room Supervisor 1		Control Room Supervisor 1	
Control Room Operators 2		Control Room Operators 2	
Auxiliary Operators 2		Auxiliary Operators 2	
Operations Support Center	N/A	Operations Support Center	Immediately
		Chemistry Technician 2	
		Electrical Technician 3*	
		EMT 2**	
		Firefighting all**	
		I&C Technician 1	
		Mechanical Technician 2*	
		Rad Waste Operator 1	
		Radiation Monitoring Tech 1	
		RP Technician 8	
		Security All	
		Offsite Fire Department All	45 minutes
		Offsite ambulance All	
		RP Technician 4	Normal hours: 1 hour Off hours 1-2 hours
Satellite Technical Support	Immediately	Satellite Technical Support	Immediately
STSC Communicator 2		STSC Communicator 2	
Emergency Coordinator 1		Emergency Coordinator 1	
RP Monitor 1		RP Monitor 1	
Shift Technical Advisor (STA) 3		Shift Technical Advisor (STA) 3	
Technical Support Center	Immediately	Technical Support Center	Immediately
Security Director 1		Security Director 1	
		Emergency Coordinator 1	
		Reactor Analyst 1	
		Technical Support Electrical 1	
		Technical Support Mechanical 1	Normal hours: 1 hour Off hours 1-2 hours
Emergency Operations Facility	N/A	Emergency Operations Facility	Normal hours: 1 hour Off hours 1-2 hours
		Emergency Operations Director 1	
		Government Liaison 1	
		Technical Analysis Supervisor 1	

NOTE: All time requirements are based on optimum response conditions.

* - One Technician position may be provided by shift personnel assigned other functions.

** - Fire Team assembles at the Building E Fire Department area for rapid response as needed.

**ATTACHMENT 3 COMPARISON TABLE:
CURRENT ON-SHIFT E-PLAN STAFFING AND PROPOSED CHANGES
VERSUS
NUREG-0654, TABLE B-1.**

Major Functional Area	NUREG-0654 Position Title or Expertise	NUREG-0654 Table B-1	Current PVNGS E-Plan (Table 1)	Proposed PVNGS E-Plan (Table 1)
		On-Shift + 30 min	On-Shift	On-Shift
Off-site dose assessment	Senior Health Physics (HP) expertise	1	2 (1 RPM & 1 RMT)	1 (1 RPM)
Off-site surveys	--	2	2 (2 RP Techs) ¹	2 (1 RP Tech & 1E-Plan Driver) ^{1,3}
On-site (out-of-plant) surveys	--	1	1 (1 RP Tech)	1 (1 Task Qualified) ²
In-Plant surveys	HP Technicians	2	2 (2 RP Techs)	2 (1 RMT & 1 RP Tech) ^{4,5}
Protective Actions (In-Plant) Radiation protection: a. Access control b. HP Coverage for repair, corrective actions, search and rescue first-aid, & firefighting c. Personnel monitoring d. Dosimetry	HP Technicians	2 (2 ^{**})	3 (2 RP Techs)	2 (2 RP Techs)
TOTAL		8	10	8

****** -- Two additional positions may be provided by shift personnel assigned other functions.

Note 1 -- Only 1 field team needed.

Note 2 -- Survey task-qualified position to be filled by a RP Technician until task-qualification path is developed.

Note 3 -- Driver Position to be filled by RP Technician until qualification path is developed

Note 4 -- RMT -- A Task-Qualified Radiation Monitoring Technician from the Chemistry Department possessing radiation protection experience

Note 5 -- In-plant survey positions may be filled by either a task-qualified RMT and a RP Technician or two task-qualified RMTs.

ATTACHMENT 4 "PROPOSED" PVNGS E-PLAN TABLE 1

Table 1 – Minimum Staffing Requirements for PVNGS for Nuclear Power Plant Emergencies			
Notification of Unusual Event		Alert, Site Area Emergency, General Emergency	
Personnel	Time	Personnel	Time
Control Room		Control Room	
Shift Supervisor 1	Immediately	Shift Supervisor 1	Immediately
Control Room Supervisor 1		Control Room Supervisor 1	
Control Room Operators 2		Control Room Operators 2	
Auxiliary Operators 2		Auxiliary Operators 2	
Operations Support Center	N/A	Operations Support Center	Immediately
		Chemistry Technician 2	
		Electrical Technician 3*	
		EMT 2**	
		Firefighting all**	
		I&C Technician 1	
		Mechanical Technician 2*	
		Rad Waste Operator 1	
		Radiation Monitoring Tech 1	
		RP Technician 3	
		RM Tech or RP Tech 1	
		E Plan Driver 1	
		Survey Task Qualified Position 1	
		Security All	45 minutes
		Offsite Fire Department All	
		Offsite ambulance All	Normal hours: 1 hour Off hours 1-2 hours
		RP Technician 6	
Satellite Technical Support	Immediately	Satellite Technical Support	Immediately
STSC Communicator 2		STSC Communicator 2	
Emergency Coordinator 1		Emergency Coordinator 1	
RP Monitor 1		RP Monitor 1	
Shift Technical Advisor (STA) 3		Shift Technical Advisor (STA) 3	
Technical Support Center	Immediately	Technical Support Center	Immediately
Security Director 1		Security Director 1	
		Emergency Coordinator 1	Normal hours: 1 hour Off hours 1-2 hours
		Reactor Analyst 1	
		Technical Support Electrical 1	
		Technical Support Mechanical 1	Normal hours: 1 hour Off hours 1-2 hours
Emergency Operations Facility	N/A	Emergency Operations Facility	
		Emergency Operations Director 1	
		Government Liaison 1	
		Technical Analysis Supervisor 1	

NOTE: All time requirements are based on optimum response conditions.

- * - One Technician position may be provided by shift personnel assigned other functions.
- ** - Fire Team assembles at the Building E Fire Department area for rapid response as needed.

- Notification of offsite emergency response agencies and offsite emergency organizations
- Provision of protective action recommendations as necessary to offsite emergency management agencies
- Subsequent reclassification of emergency events
- Determination of the necessity for site evacuation
- Authorization for emergency workers to exceed 10CFR20 exposure limits
- Initiate activation of onsite and offsite emergency response organizations for an Alert or higher level emergency classification

Prior to activation of the Onsite Emergency Organization, the functions of the Emergency Coordinator are performed at the Satellite TSC in the affected unit.

*Superseded
pages per
Rev. 19 to
Emergency
Plan
9809150226
9/8/98*

4.2.1.3 Emergency Repair Team

An Emergency Repair Team is formed if emergency repair operations are necessary. The team consists of Maintenance Technicians. If necessary, a Radiation Protection Technician may also be assigned to the team. The Emergency Repair Team reports to the Emergency Coordinator.

4.2.1.4 Fire Team

A Fire Team is maintained onsite at all times. The Department Leader, Fire Protection is responsible for ensuring that sufficient members of the Fire Team are Emergency Medical Technician (EMT) qualified and available at all times. The Fire Team reports to the Emergency Coordinator.

4.2.1.5 Operations Shift Personnel

The Operations Shift Personnel (Nuclear Operators) conduct the safe and proper operation of the unit at all times, and respond to emergency conditions, as necessary. Operations Shift Personnel report to the Assistant Shift Supervisor.

4.2.1.6 Radiation Monitoring Technician

The Radiation Monitoring Technician is a Unit Radiation Monitoring Technician. He reports to the OSC and then establishes a responsible area in the Radiation Monitoring office. He conducts offsite dose calculations until relieved by the Dose Assessment Health Physicist of the Offsite Emergency Organization. He reports to the Emergency Coordinator.

4.2.1.7 Radiation Protection Monitor

The Radiation Protection Monitor is a Radiation Protection Technician. He reports to the Emergency Coordinator and authorizes exposures up to 10CFR20 Limits, recommends potassium iodide administration to the Emergency Coordinator, and directs inplant, onsite and offsite Survey Teams. He is relieved of these responsibilities by the Radiological Protection Coordinator and Radiological Assessment Coordinator when activated.

Notification of Unusual Event		Alert, Site Area Emergency, General Emergency	
Personnel	Time	Personnel	Time
<u>Control Room</u>		<u>Control Room</u>	
Shift Supervisor 1	Immediately	Shift Supervisor 1	Immediately
Control Room Supervisor 1		Control Room Supervisor 1	
Control Room Operators 2		Control Room Operators 2	
Auxiliary Operators 2		Auxiliary Operators 2	
<u>Operations Support Center</u>	NA	<u>Operations Support Center</u>	Immediately
		Chemistry Technician 2	
		Electrical Technician 3*	
		EMT 2**	
		Firefighting all**	
		I&C Technician 1	
		Mechanical Technician 2*	
		Rad Waste Operator 1	
		Radiation Monitoring Tech 1	
		RP Technician 8	
		Security all	
		-----	45 minutes
		Offsite Fire Department all	
		Offsite ambulance all	Normal hours: immediately, Off hours: 1-2 hours

		RP Technician 4	
<u>Satellite Technical Support Center</u>	Immediately	<u>Satellite Technical Support Center</u>	Immediately
STSC Communicator 2		STSC Communicator 2	
Emergency Coordinator 1		Emergency Coordinator 1	
RP Monitor 1		RP Monitor 1	
Shift Technical Advisor (STA) 3		Shift Technical Advisor (STA) 3	
<u>Technical Support Center</u>	Immediately	<u>Technical Support Center</u>	Immediately
Security Director 1		Security Director 1	
		-----	Normal hours: 1 hour, Off hours: 1-2 hours
		Emergency Coordinator 1	
		Reactor Analyst 1	
		Technical Support Electrical 1	
		Technical Support Mechanical 1	
<u>Emergency Operations Facility</u>	NA	<u>Emergency Operations Facility</u>	Normal hours: 1 hour, Off hours: 1-2 hours
		Emergency Operations Director 1	
		Government Liaison 1	
		Technical Analysis Supervisor 1	

NOTE: All time requirements are based on optimum response conditions.

* - One Technician position may be provided by shift personnel assigned other functions.

** - Fire Team assembles at the Building E Fire Department area for rapid response as needed.

Table 1 Minimum Staffing Requirements for PVNGS for Nuclear Power Plant Emergencies