

IPEC EMERGENCY PLAN DISTRIBUTION LIST

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DATE: May 24, 2018

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TRANSMITTAL #: **EP-18-0016**

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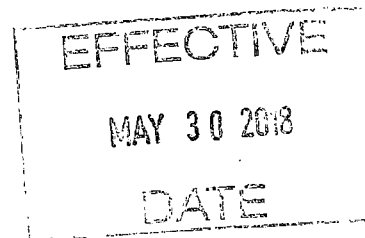
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AFFECTED DOCUMENT: **IPEC EMERGENCY PLAN PROCEDURES**

| DOC # | REV # | TITLE | INSTRUCTIONS |
|-------|-------|-------|--------------|
|-------|-------|-------|--------------|

THE FOLLOWING PROCEDURE IS BEING "VOIDED", PLEASE REMOVE FROM YOUR BOOKS:

IP-1055 REV.18



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| | | | |
|--------------------------------|---------|-----------|----|
| Procedure/Document Number: | IP-1055 | Revision: | 18 |
| Equipment/Facility/Other: IPEC | | | |
| Title: Fire Emergency Response | | | |

Part I. Description of Activity Being Reviewed (event or action, or series of actions that have the potential to affect the emergency plan or have the potential to affect the implementation of the emergency plan):

- Procedure being revised due to QA CR, CR-IP2-2018-02682.
- Added new date for approval - Revision 17 had an approval date of 6/29/1 on the front cover page. Revised the cover page to include a correct date.
- Replaced IP-SMM-DC-001 "IPEC Fire Protection Program Plan" with SEP-FPP-IP-001 "IPEC Fire Protection Program Plan".
- Replaced IP-EP-115 Form EP-6 "Emergency Exposure Authorization" with EP-4-ALL "Exposure Authorization Form"
- Replaced IP-EP-115 Form EP 29 "Individuals Exposure Tracking Log" with EP-6-ALL "Team Tracking Form".
- Reference procedures were moved to interface procedures. This better aligns the procedures' functions.
- 10CFR20 was removed from interface procedures, since this is only a reference procedure.

Part II. Emergency Plan Sections Reviewed (List all emergency plan sections that were reviewed for this activity by number and title. IF THE ACTIVITY IN ITS ENTIRETY IS AN EMERGENCY PLAN CHANGE OR EAL OR EAL BASIS CHANGE, ENTER THE SCREENING PROCESS. NO 10 CFR 50.54(q)(2) DOCUMENTATION IS REQUIRED.

Part II Section A: Assignment of Responsibility

Part II Section B: Station Emergency Response Organization

Part II Section D: Emergency Classification System

Part II Section E: Notification Methods and Procedures

Part II Section H: Emergency Facilities and Equipment

Part II Section K: Radiological Exposure Control

Part II Section L: Medical and Public Health Support

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Part III. Ability to Maintain the Emergency Plan (Answer the following questions related to impact on the ability to maintain the emergency plan):

1. Do any elements of the activity change information contained in the emergency plan (procedure section 3.0(6))?
YES ☐ NO ☒ IF YES, enter screening process for that element
2. Do any elements of the activity change an emergency classification Initiating Condition, Emergency Action Level (EAL), associated EAL note or associated EAL basis information or their underlying calculations or assumptions?
YES ☐ NO ☒ IF YES, enter screening process for that element
3. Do any elements of the activity change the process or capability for alerting and notifying the public as described in the FEMA-approved Alert and Notification System design report?
YES ☐ NO ☒ IF YES, enter screening process for that element
4. Do any elements of the activity change the Evacuation Time Estimate results or documentation?
YES ☐ NO ☒ IF YES, enter screening process for that element
5. Do any elements of the activity change the Onshift Staffing Analysis results or documentation?
YES ☐ NO ☒ IF YES, enter screening process for that element

Part IV. Maintaining the Emergency Plan Conclusion The questions in Part II do not represent the sum total of all conditions that may cause a change to or impact the ability to maintain the emergency plan. Originator and reviewer signatures in Part IV document that a review of all elements of the proposed change have been considered for their impact on the ability to maintain the emergency plan and their potential to change the emergency plan.

1. Provide a brief conclusion that describes how the conditions as described in the emergency plan are maintained with this activity.
2. Check the box below when the 10 CFR 50.54(q)(2) review completes all actions for all elements of the activity – no 10 CFR 50.54(q)(3) screening or evaluation is required for any element. Otherwise, leave the checkbox blank.
☒ I have completed a review of this activity in accordance with 10 CFR 50.54(q)(2) and determined that the effectiveness of the emergency plan is maintained. This activity does not make any changes to the emergency plan. No further actions are required to screen or evaluate this activity under 10 CFR 50.54(q)(3).

All changes are considered editorial in nature. The form changes were previously reviewed under a separate 50.54Q review. A review of this activity in accordance with 10 CFR 50.54(q)(2) has been completed and determined that the effectiveness of the emergency plan and the intent of the procedure is maintained. This activity does not make any changes to the IPEC Emergency Plan. No further actions are required to screen or evaluate this activity under 10 CFR 50.54(q)(3).

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| Title: Fire Emergency Response | | |

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| Part V. Signatures: | | |
| Preparer Name (Print) Rebecca A. Martin Sr. EP Project Manager | Preparer Signature <i>Rebecca A. Martin</i> | Date: 5/23/18 |
| (Optional) Reviewer Name (Print) | Reviewer Signature | Date: |
| Reviewer Name (Print) Timothy F. Garvey Nuclear EP Project Manager | Reviewer Signature | Date: |
| Reviewer Name (Print) Frank J. Mitchell Manager, Emergency Planning or designee | Reviewer Signature | Date: |

| | | | |
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| Part V. Signatures: | | |
| Preparer Name (Print) Rebecca A. Martin Sr. EP Project Manager | Preparer Signature <i>Rebecca A Martin</i> | Date: 5/23/18 |
| (Optional) Reviewer Name (Print) | Reviewer Signature | Date: |
| Reviewer Name (Print) Timothy F. Garvey Nuclear EP Project Manager | Reviewer Signature <i>Tim Garvey</i> | Date: 5/24/18 |
| Reviewer Name (Print) Frank J. Mitchell Manager, Emergency Planning or designee | Reviewer Signature <i>Frank Mitchell</i> | Date: 5/29/18 |

IPEC IMPLEMENTING PROCEDURE PREPARATION, REVIEW, AND APPROVAL

IP-SMM-AD-102 Rev: 15

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ATTACHMENT 10.2

IPEC PROCEDURE REVIEW AND APPROVAL

Procedure Title: Fire Emergency Response

Procedure No. IP-1055 Existing Rev: 17 New Rev: 18 DRN/EC No: DRN-18-0680

| Procedure Activity (MARK Applicable) | <input type="checkbox"/> Converted To IPEC, Replaces: | Temporary Procedure Change (MARK Applicable) |
|--|--|--|
| <input type="checkbox"/> NEW PROCEDURE <input type="checkbox"/> GENERAL REVISION <input type="checkbox"/> PARTIAL REVISION <input checked="" type="checkbox"/> EDITORIAL REVISION <input type="checkbox"/> VOID PROCEDURE <input type="checkbox"/> SUPERSEDED | Unit 1 Procedure No. _____ Unit 2 Procedure No: _____ Unit 3 Procedure No: _____ | <input type="checkbox"/> EDITORIAL Temporary Procedure Change <input type="checkbox"/> ADVANCE Temporary Procedure Change <input type="checkbox"/> CONDITIONAL Temporary Procedure Change Terminating Condition: _____ _____ |
| <input type="checkbox"/> RAPID REVISION | Document in Microsoft Word: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> VOID DRN/TPC No(s): _____ |

Revision Summary Editorial changes made. Updated approval date. Updated procedures/forms that were superseded procedures, moved reference procedures to interface procedures.

Implementation Requirements

Implementation Plan? ☒ Yes ☐ No Formal Training? ☐ Yes ☒ No Special Handling? ☐ Yes ☒ No

RPO Dept: Emergency Planning Writer: (Print Name/Ext/Sign): Rebecca A. Martin / x7106 / *Rebecca A. Martin*

Review and Approval (Per Attachment 10.1, IPEC Review And Approval Requirements)

1. ☐ Technical Reviewer: _____
(Print Name/ Signature/ Date)
2. ☐ Cross-Disciplinary Reviewers:

Dept: _____ Reviewer: _____
Print Name/ Signature/ Date)

Dept: _____ Reviewer: _____
Print Name/ Signature/ Date)
3. ☒ RPO- Responsibilities/Checklist: Frank Mitchell / *Frank Mitchell* 5/23/18
(Print Name/ Signature/ Date)

☐ PAD required and is complete (PAD Approver and Reviewer qualifications have been verified)
☒ Previous exclusion from further LI-100 Review is still valid
☐ PAD not required due to type of change as defined in 4.6
4. ☐ Non-Intent Determination Complete: _____
(Print Name/ Signature/ Date)

NO change of purpose or scope

NO reduction in the level of nuclear safety


NO voiding or canceling of a procedure, unless requirements are incorporated into another procedure or the need for the procedure was eliminated

NO change to less restrictive acceptance criteria

NO change to steps previously identified as commitment steps

NO deviation from the Quality Assurance Program Manual

NO change that may result in deviations from Technical Specifications, FSAR, plant design requirements,
5. ☐ On-Shift Shift Manager/CRS: _____
(Print Name/ Signature/ Date)
6. ☐ User Validation: User: _____ Validator: _____
7. ☐ Special Handling Requirements Understood: _____
(Print Name/ Signature/ Date)

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Attachment 9.1

Emergency Planning Document Change Checklist Form

(All sections must be completed, N/A or place a check on the line where applicable)

Section 1

| | |
|-----------------------------|--|
| Doc/Procedure Type: | Administrative <input type="checkbox"/> Implementing <input checked="" type="checkbox"/> EPLAN <input type="checkbox"/> N/A <input type="checkbox"/> |
| Doc/Procedure No: | IP-1055 |
| Doc/Procedure Title: | Fire Emergency Response |
| Corrective Action: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> CR#: <u>CR-2-18-2682</u> |

Section 2

Change Description

1. Ensure the following are completed, or are not applicable and are so marked:
 - a. 50.54q ☒ N/A ☐
 - b. EN-FAP-OM-023 ☐ N/A ☒
 - c. IP-SMM- AD-102 ☒ N/A ☐
 - d. OSRC ☐ N/A ☒

2. Transmittals are completed: ☐ N/A ☐ Date: _____

3. Ensure the proper revision is active in Merlin: ☐ N/A ☐

4. Approved doc/procedure delivered to Doc. Control for distribution: ☐ N/A ☐ Date: _____

5. Position Binders updated: ☐ N/A ☐ Date: _____

6. Copy of EPDCC placed in EP file: ☐ N/A ☐ Date: _____

7. Supporting documentation is submitted as a general record in MERLIN: ☐ N/A ☐ Date: _____

8. Word files are moved from working drafts folder to current revision folder in the EP drive:

☐ N/A ☐ Date: _____



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Fire Emergency Response

Prepared by:

Rebecca A. Martin
Print Name

Rebecca A. Martin
Signature

5/23/18
Date

Approval:

Frank J. Mitchell
Print Name

FL Mitchell
Signature

5/23/18
Date

Effective Date: May 30, 2018

This procedure is not to be used for any other purpose.



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Fire Emergency Response

1.0 PURPOSE

This procedure describes the actions to be taken by personnel who respond to a fire emergency at Indian Point Energy Center (IPEC). This procedure shall also be followed during normal plant operations and when a fire exists in the Radiological Controlled Area (RCA).

2.0 REFERENCES

- 2.1 IP-EP-AD13 IPEC Emergency Action Level Technical Bases
- 2.2 SEP-FPP-IP-001, "IPEC Fire Protection Program Plan"
- 2.3 2-ONOP-FP-001, "Plant Fires"
- 2.4 3-ONOP-FP-1, "Plant Fires"
- 2.5 10CFR20

3.0 DEFINITIONS

- 3.1 Contamination – Radioactive material where it's not wanted
- 3.2 Control Room Operator – Licensed individual in control room operations
- 3.3 Decon – process to remove contamination from a person or piece of equipment
- 3.4 Dosimeter – Equipment used to measure radiation and provide the wearer with a reading of accumulated exposure.
- 3.5 Emergency Telephone Directory – IPEC telephone directory for emergency numbers and Emergency Response Organization; this is located on the Emergency Planning website.
- 3.6 Radiation Protection Technician – Trained individual in radiation protection and detection
- 3.7 NPO – Nuclear Plant Operator – non-licensed operator in the plant
- 3.8 Shift Manger – Licensed operator in charge of plant operations
- 3.9 DLR – Permanent record of an individual's radiation exposure



4.0 **RESPONSIBILITIES**

- 4.1 When a fire is discovered, all personnel are responsible for notifying the Control Room (CR). Notification of a fire should be made using emergency phone extensions **5911** for both Unit 2 and Unit 3, and should include the caller's name along with the location and nature of the fire.
- 4.2 In accordance with 2-ONOP-FP-001, "Plant Fire" and 3-ONOP-FP-1, "Plant Fires", the CR is responsible for making the required notifications and sounding the fire alarm.
- 4.3 The CR is responsible for determining activation of the Emergency Plan as per the Emergency Action Levels (EALs) found in IP-EP-AD-13, "IPEC Emergency Action Level Technical Bases".
- 4.4 The Shift Manager (SM) or Emergency Director (ED) is authorized to allow fire fighters to exceed 10CFR20 limits. Exposure Authorization Form (EP-4-ALL) shall be used.
- 4.5 "Emergency Use of Potassium Iodine (KI)", the SM or ED determines the need to issue potassium iodine (KI) tablets by discussions with Radiological Coordinator or Radiological Assessment Coordinator.
- 4.6 In accordance with "Site Fire Protection" and "Fire Emergency" the Site Fire Brigade is responsible for responding to any fire emergency at IPEC and for requesting offsite fire fighting assistance, if needed. Requests for offsite assistance are made via the Unit 2 Control Room.
- 4.7 In accordance with the appropriate procedures, Security is responsible for directing site personnel and offsite fire assistance, and evacuating unnecessary personnel from the fire area.
- 4.8 In accordance with this procedure, the Watch Radiation Protection Technician/designee is responsible for responding to any fire in the Radiological Controlled Area (RCA).

5.0 **DETAILS**

- 5.1 When requested by the Fire Brigade Leader and as directed by the SM the Off-Site Fire Department will be called, from the Unit 2 Control Room for assistance.
- 5.2 The Control Room will notify Security of the impending arrival of the Verplanck Fire Department.
- 5.3 When required, the EP Manager will ensure activation of the Emergency Plan.



A. **IF** the Emergency Response Facilities (ERFs) are staffed, **THEN**:

1. Via the Radiological Coordinator in the Technical Support Center (TSC), the Plant Operations Manager (POM) will assess the radiological conditions that exist at the fire scene.
2. Prior to dispatching the Fire Brigade, the POM shall assess the following conditions. (If radiological conditions exist where there is a potential to exceed the 10CFR20 limits, refer to EP-4-ALL, Exposure Authorization Form.

- Area dose rate < 10 R/hr.:

The fire Brigade shall be dispatched from the CR to the fire scene. Notification shall then be made to the OSC to dispatch a Radiation Protection Technician to the fire scene to provide radiological guidance.

- Area dose rate > 10 R/hr.:

The POM shall designate a briefing area (e.g., entry into the RCA). Notify the OSC to dispatch a Radiation Protection Technician to the briefing location where he will provide radiological guidance. Authorize dispatch of Fire Brigade to the briefing location prior to responding to the fire scene.

3. **CONDUCT** a debriefing to ensure that the POM and OSC Manager are cognizant of the Fire Brigade actions.

- 5.4 **ENSURE** Radiation Protection Technicians are performing all necessary duties as listed on Attachment 9.1, "Watch Radiation Protection Fire Response".
- 5.5 **ENSURE** Security Officers are performing all necessary duties as listed on Attachment 9.2, "Security Fire Response".

NOTE

Provided full turnout gear is worn, when fighting a fire in a contaminated area, Anti-C clothing is not required to be worn by the Site Fire Brigade and offsite fire fighters.

FOR UNIT 3: Access through the Turnstile at the 4th floor Control Point may be obtained by using the key located in the glass box attached to the Turnstile.

FOR UNIT 2: Enter without use of the Turnstile



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6.0 INTERFACES

6.1 EN-EP-900, Emergency Preparedness Forms

6.1.1 EP-4-ALL , "Exposure Authorization Form"

6.1.2 EP-6-ALL , "Team Tracking Log"

6.2 FP-7, Fire Notification Guidelines

6.3 IP-EP-AD13, *IPEC Emergency Action Level Technical Bases*

7.0 RECORDS

All forms and logs completed by the Emergency Response Organization during a declared emergency are Quality Records and shall be maintained for the life of the plant plus twenty (20) years.


8.0 REQUIREMENTS AND COMMITMENT CROSS-REFERENCE

8.1 This procedure does not degrade any requirements or commitments

9.0 ATTACHMENTS


9.1 Watch Radiation Protection Technician Fire Response

9.2 Security Fire Response

| | | | | |
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Watch Radiation Protection Fire Response
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1. **RESPOND** to all fires in the RCA and have a Self-Contained Breathing Apparatus (SCBA) available for use if needed.
2. For communications with the CR and the Fire Brigade Leader, **BRING** a radio tuned to Frequency #2.
3. **UPON** arrival to the fire scene, **NOTIFY** the Fire Brigade Leader.
4. **EVALUATE** the location of the fire and address any radiological concerns directly to the Fire Brigade Leader at the fire scene or at a briefing designated by the POM.
5. **MAKE** every effort to keep exposures to fire fighters As Low As Reasonably Achievable (ALARA).
6. When possible, **CHECK** all fire fighters to ensure they have the appropriate Dosimetry. If not already done, issue Dosimetry.
7. **SET UP** an air sampler (particulate and iodine) as close as practical to where the smoke may be venting. If available at the fire scene, use a Continuous Air Monitor (CAM) as per approved Radiation Protection procedures.
8. **IF** it becomes necessary for any fire fighter to exceed 10CFR20 limits, **THEN** notify the SM/ED/POM.
9. **IF** it becomes necessary for the offsite fire fighters to exceed Entergy Nuclear Northeast's radiation exposure limits (500 mRem per year) **THEN** notify the SM/ED/POM.
10. **DURING** the fire fighting operations, **EVALUATE** the potential for the spread of radioactive contamination from the use of water.
11. **EVALUATE** airborne activity through the use of the Counting Room. If the air sample activity is greater than 3E-9 µCi/cc, an isotopic analysis is required.
12. **NOTIFY** the Fire Brigade Leader of any restrictions you are imposing on the fire fighters.

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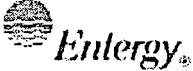
Attachment 9.1
Watch HP Fire Response
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13. As directed by the SM/ED/POM or-Radiological Assessment Coordinator, **ISSUE** KI.
14. When venting smoke, **ADVISE** the Fire Brigade Leader as to proper control of airborne activity. Depending on the heat involved, secondary fires may arise in the ventilation system/filters. The Radiation Protection Technician and the Fire Brigade Leader should consider shutting down the ventilation system if such a possibility exists.
15. **EVALUATE** the need for decontamination and whole body counting of personnel as described in approved Radiation Protection procedures.
16. **DETERMINE** if internal exposure should be assigned.
17. AFTER the fire has been extinguished, **RECORD** the name of each fire fighter and their DLR number on EP-6-ALL, "Team Tracking Log". In addition, obtain a DLR Badge Request Form from Dosimetry and complete it at this time.
 - **IF** the SM/ED/POM has authorized an extension to receive emergency personnel exposure above 10CFR20 limits, **THEN** complete EP-4-ALL, "Exposure Authorization Form".
 - **RETURN** completed forms to the Dosimetry Office.
18. BEFORE allowing the fire fighters to leave the RCA for the last time, **CHECK** them, their clothing and equipment for possible contamination as per approved Radiation Protection procedures.

NOTE

In order to prevent interference with fire fighting efforts, repeated exits from the RCA WITHOUT frisking is permitted.

19. All clothing and equipment which is not permitted to be removed from the RCA due to contamination should be inventoried for compensation.

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Attachment 9.2

Security Fire Response

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1. **DIRECT** responding personnel and offsite fire fighters and accompanying apparatus' through the nearest gate to the fire area.
2. **IF** responding to the fire, **THEN** wear a SCBA.
3. **EVACUATE** unnecessary personnel from the fire area.
4. **IF** fire is located in the RCA, **THEN** do the following:
 - **ENSURE** access for Fire Brigade at 4th floor HP Control Point (**Unit 3**)
 - **ENSURE** the Fire Truck is given the Fire Fighter Kit located at the Main Gate Security Station.