

Attachment

**Summary of 50.54(q) Analyses,
Cooper Nuclear Station Emergency Plan, Revision 74**

CHANGE – Description

Cooper Nuclear Station's (CNS) Emergency Plan (E-Plan) was revised as follows:

Section 8.2, Drills and Exercises, revised to add guidance that drill/exercise scenarios shall provide reasonable assurance that anticipatory responses will not result from preconditioning of participants and scenarios shall vary from exercise to exercise and must include a wide spectrum of radiological releases and events, including hostile action.

Section 8.5, Review and Update of the Emergency Plan, revised to add a requirement for annual review of Emergency Action Levels (EAL) with State and Local emergency management personnel.

CHANGE – Summary of Analysis (10 CFR 50.54(q) Evaluation)

Licensing Basis Affected by Change:

E-Plan, Section 2.3, discusses that Nebraska Public Power District's (NPPD) E-Plan for CNS interfaces with several State and Local Emergency response plans for areas that comprise the CNS Emergency Planning Zones. In the event of a radiological emergency, the State and Local agencies are responsible for coordinating their efforts in dealing with radiological concerns beyond the CNS site boundaries.

E-Plan, Section 2.5, states that the protection of the health and safety of the general public is the prime concern. Accordingly, appropriate Local, State, and Federal agencies will be supported by NPPD to the fullest extent practical.

E-Plan, Section 8.5, provides an overview of annual review requirements and independent audits of the E-Plan.

E-Plan, Section 8.2, discusses drill/exercise participation and provisions for an off-hour start time at least once in an eight-year cycle.

E-Plan, Section 8.2.1, discusses the conduct of exercises which are conducted annually with participating Federal, State, and Local agencies to assure effective emergency response. Objectives for joint exercises are developed with the appropriate States. Requirements for exercise scenarios are also listed in this section.

How Change Complies with Regulations and Previous Commitments:

10 CFR 50.47(b)(4) requires that a standard scheme of emergency classification and action levels is in use.

10 CFR 50.47(b)(14) requires that periodic exercises are conducted to evaluate major portions of emergency response capabilities, periodic drills are conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are corrected.

10 CFR Part 50, Appendix E, Sections IV.F.1–2, requires that site emergency plans address the following:

1. Training of employees and exercising, by periodic drills, of emergency plans to ensure that employees of the licensee are familiar with their specific emergency response duties, and participation in the training and drills by other persons whose assistance may be needed in the event of a radiological emergency.
2. Provisions for the conduct of emergency preparedness exercises as follows: exercises shall test the adequacy of timing and content of implementing procedures and methods, test emergency equipment and communications networks, test the public alert and notification system, and ensure that emergency organization personnel are familiar with their duties.

Compliance – This change ensures that the applicable regulatory requirement for review of EALs and drill and exercise program requirements are maintained.

No regulatory commitments were impacted by this change.

Affected Emergency Planning Functions/Impact on Effectiveness of Emergency Planning Functions:

10 CFR 50.47(b)(4); Function – A standard scheme of emergency classification and action levels is in use.

10 CFR 50.47(b)(14); Function – A drill and exercise program is established.

Site implementing procedures currently contain drill/exercise and EAL review requirements and associated guidance. This change ensures the CNS E-Plan aligns with regulatory requirements for what is required to be included in a site emergency plan. The change does not alter or remove existing requirements from the E-Plan and does not impact the drill and exercise program or EAL scheme.

The change continues to meet the above planning standard functions and does not constitute a reduction in the effectiveness of the CNS E-Plan.

OTHER CHANGES

In Section 6.5, the acronym for Alert and Notification System (ANS) and a description of established back-up ANS methods were added. Information on the alerting methods comes directly from the Federal Emergency Management Agency approved ANS Design Report for CNS.

In Appendix B, the cross-references are updated to the applicable NUREG-0654 and E-Plan sections and numbering in Table 7.1-1 was revised to correct an error.

These changes did not affect an emergency planning element/function and did not require a full 10 CFR 50.54(q) evaluation.

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Enclosure

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Cooper Nuclear Station Emergency Plan, Revision 74

NEBRASKA PUBLIC POWER DISTRICT

EMERGENCY PLAN FOR COOPER NUCLEAR STATION

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THE NEBRASKA PUBLIC POWER DISTRICT
EMERGENCY PLAN FOR
COOPER NUCLEAR STATION

INTRODUCTION

The Cooper Nuclear Station (CNS) is a one-unit Boiling Water Reactor power station rated at approximately 830 Mw(e) operated by the Nebraska Public Power District. The station is located on the west bank of the Missouri River between the towns of Brownville and Nemaha, Nebraska. Cooper Nuclear Station has been in commercial operation since July 1974. An independent spent fuel storage installation is located within the Protected Area of CNS.

This Emergency Plan: (1) describes the organization formed to manage emergency situations; (2) provides the mechanism to classify emergencies according to severity of consequences; (3) defines and assigns functional responsibilities for emergency response actions; (4) outlines courses-of-action and protective measures to mitigate the consequences of an accident and to safeguard station personnel and the public; and (5) presents a general post-emergency plan and District organization for restoring the plant to normal operating status. Detailed implementing procedures for specific emergency actions during an incident are contained in the Cooper Nuclear Station Emergency Plan Implementing Procedures.

This Emergency Plan establishes the policies and practices involving the Nebraska Public Power District in the unlikely event of an emergency at the Cooper Nuclear Station. Additions, deletions, or modifications to this Emergency Plan must be reviewed by the Station Operations Review Committee and approved by the Director of Nuclear Safety Assurance before such changes can be incorporated. The Director of Nuclear Safety Assurance has overall authority and responsibility for radiological emergency response planning at CNS.

The Emergency Plan Implementing Procedures for the Nebraska Public Power District emergency response activities are the documents which implement the requirements of this plan. Additions, deletions, or modifications to the Emergency Plan Implementing Procedures are made in accordance with the CNS Administrative Procedures.

Copies of this Plan and the implementing documents shall be issued via a system of controlled distribution which will assure that all copies remain current.

1. DEFINITIONS

The following are definitions of terms commonly used in the Nebraska Public Power District (NPPD) Emergency Plan.

- 1.1 Annual - Once during every calendar year.
- 1.2 Assessment Actions - Actions taken during or after an emergency to obtain and process information necessary to determine the character and magnitude of the emergency and specific corrective emergency measures.
- 1.3 Class "A" Dose Assessment Model - A dose assessment computer code which utilizes actual 15 minute average meteorological data from the meteorological instrumentation maintained by the licensee or from alternate meteorological sources. This model provides calculations of relative concentrations and transit times within the plume exposure Emergency Planning Zone (EPZ). The output from a Class A model typically includes the plume dimensions and position, and the location, magnitude, and arrival time of (1) the peak relative concentration, and (2) the relative concentrations at appropriate locations.
- 1.4 Control Room - The Control Room, operating under the direction of the Shift Manager, is the primary point from which station conditions are monitored and controlled. It is the point where many corrective actions are taken to mitigate an emergency and where the initial assessment and classification of an emergency are made.
- 1.5 Corrective Actions - Measures taken to reduce the severity of, or terminate an emergency at or near the source of the problem; to prevent an uncontrolled release of radioactive material; or to reduce the magnitude of the radioactive release.
- 1.6 Dosimeter of Legal Record (DLR) - A radiation dose monitoring device. A device used to determine an individual's accumulated external occupational radiation exposure including Deep Dose Equivalent (DDE), Lens Dose Equivalent (LDE), and Shallow Dose Equivalent (SDE). The term DLR is inclusive of Optically Stimulated Luminescent Dosimeters (OSLDs) and Thermoluminescent Dosimeters (TLDs).
- 1.7 Emergency Action Levels - Parameter thresholds or sets of conditions used to classify an emergency. These parameters or conditions are indicators of the severity or potential severity of the emergency.
- 1.8 Emergency Operations Facility (EOF) - The Emergency Response Facility which is the focal point for overall NPPD Management of an emergency at CNS, and coordination of off-site radiological emergency operations. When activated, the EOF is under the direction of the EOF Director, who is responsible for maintaining continued coordination with governmental authorities regarding radiological consequences of an incident.
- 1.9 Emergency Planning Zone (EPZ) - Defined area established around CNS for which emergency planning is set forth in detail. These are the areas in which the potential need for protective action(s) is recognized and addressed. The two EPZs are defined as the plume exposure pathway and ingestion exposure pathway.

- 1.10 Hostile Action - An act toward a nuclear power plant or its personnel that includes the use of violent force to destroy equipment, take hostages, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, projectiles, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included.
- 1.11 Information Authentication Center - That portion of the EOF where information concerning the emergency is gathered, coordinated, and disseminated.
- 1.12 Ingestion Exposure Pathway - The pathway through which principal exposure would be from the ingestion of contaminated water, milk, or food. The ingestion exposure pathway is referred to as the 50-mile EPZ since it includes the area within a 50-mile radius of CNS.
- 1.13 Joint Information Center (JIC) - The Off-Site Emergency Response Facility which is the prime location for coordinating news releases of information concerning the emergency between Utility, State, and Federal representatives. Employee information and rumor control activities are also coordinated from this location.
- 1.14 Legal Record - A document that satisfies State and Federal Regulations concerning radiation exposure to individuals.
- 1.15 Local Emergency Response Plans - Plans for local governmental response to radiological emergencies at CNS by Nemaha, Otoe, and Richardson counties in Nebraska and Atchison County in Missouri.
- 1.16 Operational Support Center (OSC) - The On-Site Emergency Response Facility from which Emergency Repair Teams, Monitoring Teams, Damage Control Teams, in-plant assignments, or other emergency response activities are coordinated and dispatched. The OSC is under the direction of the OSC Supervisor.
- 1.17 Plume Exposure Pathway - The pathway through which principal exposure is by whole body exposure to gamma radiation (from the plume and deposited materials) and inhalation exposure (from the passing radioactive plume). The time of potential exposure could range in length from minutes to days. The dimensions of the plume exposure planning zone are depicted in Appendix C and is also referred to as the 10-mile EPZ.
- 1.18 Process Radiation Monitoring System - Instrumentation designed to detect abnormal radiation levels and to activate appropriate alarms and controls for process and effluent plant system pathways.
- 1.19 Protective Actions - Actions taken to prevent or minimize radiological exposure. These may include in-house shelter, evacuation, respiratory protection, and thyroid blocking.
- 1.20 Protective Action Guides - The projected radiological dose which warrants protective action to minimize exposure to radioactive material. (Reference: "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" as revised May 1992, EPA 400-R-92-001.)

- 1.21 Recovery Actions - Post-emergency assessment, planning, resource allocation and corrective actions taken to restore the station as nearly as possible to its pre-emergency condition.
- 1.22 State Emergency Response Plans - Plans for the States of Nebraska, Missouri, Iowa, and Kansas responding to radiological emergencies at CNS. Each plan sets forth specific responsibilities and procedures for emergency agencies responsible for off-site emergency operations and the protection of the affected population.
- 1.23 Technical Support Center (TSC) - The On-Site Emergency Response Facility which provides space and equipment for emergency response personnel to monitor station conditions, analyze problems, and provide technical guidance and assistance to the Control Room, OSC, and EOF. It also contains technical documents and drawings, and is the focal point for on-site corrective action implementation during an emergency. This facility is under the direction of the TSC Director.

2. SCOPE AND APPLICABILITY

- 2.1 The Nebraska Public Power District (NPPD) Emergency Plan for CNS provides the mechanism to classify various types of emergencies and provides prior planning of emergency preparedness implementation actions. It delineates organized functions and responsibilities for the control and mitigation of an emergency to assure maximum protection of the public, station personnel, and plant equipment. This plan delineates responsibilities and actions to be taken by station, general office personnel, and other agencies during emergencies.
- 2.2 The Emergency Plan Implementing Procedures (EPIPs) designate responsibilities and define actions to be taken by assigned personnel in order to reduce or confine the consequences of an emergency. Appendix A provides the titles and summaries of the EPIPs.
- 2.3 The NPPD Emergency Plan interfaces with several State and Local Emergency Response Plans for areas that comprise the CNS Emergency Planning Zones (EPZs). Within the Nebraska portion of the 10-mile EPZ this Plan interfaces with the Nemaha County, Richardson County, and State of Nebraska Radiological Response Plans, as well as the Reception Area Plans for Otoe and Richardson Counties. Within the Missouri portion of the 10-mile EPZ, this plan interfaces with the Atchison County Nuclear Emergency Response Plan and the State of Missouri Nuclear Accident Plan. For the 50-mile Ingestion Pathway EPZ, the NPPD plan interfaces with the Radiological Response Plans of the states of Iowa and Kansas, as well as those of Nebraska and Missouri. In the event of a radiological emergency, the State and Local Agencies are responsible for coordinating their efforts in dealing with radiological concerns beyond the CNS site boundaries.
- 2.4 In addition to State and Local support, Federal agencies may also provide assistance in accordance with the National Response Framework (NRF) (i.e., Department of Homeland Security (DHS), Nuclear Regulatory Commission (NRC), Environmental Protection Agency (EPA), Department of Energy (DOE), Coast Guard, and Federal Emergency Management Agency (FEMA)). The NRC, acting as the coordinating agency, has technical leadership for the Federal government's response to an event.

- 2.5 The protection of the health and safety of the general public is the prime concern; accordingly, the appropriate Local, State, and Federal Agencies will be supported by NPPD to the fullest extent practical.

3. SUMMARY OF THE NEBRASKA PUBLIC POWER DISTRICT (NPPD) CNS EMERGENCY PLAN

- 3.1 Nuclear power plant emergency plans are required to fulfill the requirements of 10CFR50.47 and Appendix E. The Nuclear Regulatory Commission (NRC) is required to determine the adequacy of the licensee Emergency Plan. The Federal Emergency Management Agency (FEMA) is required to determine the adequacy of State and Local Plans. Together, the two agencies determine the adequacy of overall emergency preparedness.
- 3.2 The CNS Emergency Plan has been structured with NRC and FEMA guidance contained in NUREG-0654, Rev. 1 (FEMA-REP-1), "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants", Revision 1, November 1980. Appendix B of this plan provides a cross-index of the CNS Emergency Plan to NUREG-0654, Rev. 1 (FEMA REP 1).
- 3.3 The plan delineates the organization for emergencies, provides the methodology for classifying emergencies according to severity, defines and assigns responsibilities and authorities, and outlines measures to mitigate the consequences of an accident and minimize effects on the health and safety of the public and station personnel. In addition, the plan presents a general approach and organization for station recovery.
- 3.4 Radiological emergency planning for CNS has been coordinated with State and Local Emergency Response Agencies. The States of Nebraska, Missouri, Iowa, and Kansas, as well as the appropriate local government agencies which would be involved in emergency response operations, are aware of the emergency response measures described in the CNS Emergency Plan and will be advised of changes or modifications to these measures resulting from plan reviews and audits.
- 3.5 The CNS Emergency Response Organization (ERO) is responsible for on-site emergency operations and for maintaining a continuous flow of accurate radiological and station status information to off-site emergency authorities.
- 3.6 Sections of the Emergency Plan in the balance of this document detail the emergency preparedness program. The contents of those sections are summarized below:
- Section 4 - Emergency Conditions - Describes emergency classifications, initiating events, emergency actions levels, and corresponding NPPD and State and Local actions in response to each emergency classification. Emergency action levels and corresponding actions noted are based upon design and operating characteristics specific to CNS and described in NRC Endorsed Nuclear Energy Institute (NEI) Document 99-01, Revision 5, Methodology For Development of Emergency Action Levels.

- Section 5 - Organizational Control of Emergencies - Describes the function and responsibilities of the CNS emergency response organization. Interfaces with off-site emergency agencies are defined and specified. This section also defines the specific assignments of personnel and identifies local and contract support service arrangements.
- Section 6 - Emergency Measures - Describes the activation of the emergency response organization, assessment of plant conditions, initiation of protective and corrective actions on-site, recommendation of protective actions off-site, and measures to aid injured or contaminated personnel.
- Section 7 - Emergency Response Facilities and Equipment - Describes facilities, emergency response equipment, and communications systems (on-site and off-site) available to assess emergency conditions, support emergency operations, notify off-site support agencies, provide aid to injured or contaminated personnel, and to control and mitigate incident-related damage.
- Section 8 - Maintaining Emergency Preparedness - Describes the Emergency Preparedness Department and Emergency Preparedness Training Program, emergency drills and exercises, methods to review and update the Emergency Plan, and the process to maintain an adequate inventory of emergency equipment and supplies. This section also outlines methods used to provide emergency preparedness information to the general public.
- Section 9 - Recovery - Defines, in general terms, post-emergency re-entry and recovery plans and organization. Recovery operations are divided into short-term activities, which are conducted during and immediately after an emergency, and long-term recovery activities, which comprise the more involved post-emergency efforts to return the station to a normal operating status.
- Appendix A contains summaries of each EPIP and a cross-reference to the appropriate section of the CNS Emergency Plan.
- Appendix B contains the cross-reference of the CNS Emergency Plan to NUREG-0654, Rev 1, (FEMA REP 1).
- Appendix C contains maps and other references which depict evacuation routes, environmental sampling points, population distribution, etc., as defined in NUREG-0654, Rev. 1 Section J.10.(a) and (b)
- Appendix D contains a listing of the Letters of Agreement maintained with off-site support agencies. The Emergency Plan signature page verifies that current Letters of Agreement are maintained in the Emergency Preparedness files as specified in Appendix D.
- Appendix E contains a list of supplies and emergency equipment typical of the inventory kept in the emergency response equipment lockers and storage areas.
- Appendix F contains a listing of the interfacing emergency response plans of the various Local, State, and Federal Support Agencies.

4. EMERGENCY CONDITIONS

CNS maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant Operators that an emergency action level has been exceeded and shall promptly declare the emergency condition as soon as possible following identification of the appropriate emergency classification level.

The types of emergencies considered in the CNS Emergency Plan are classified into four categories as recommended in Emergency Action Level Guidelines for Nuclear Power Plants, Appendix 1, NUREG-0654, Rev. 1. The initiating conditions of NRC endorsed document NEI 99-01, Revision 5, "Methodology For Development of Emergency Action Levels", as well as the postulated accidents described in Chapter XIV of the Cooper Nuclear Station (CNS) Updated Safety Analysis Report, have been considered in developing the criteria presented in Section 4.1. Tables 4.1-1 through 4.1-4 provide specific Emergency Action Levels. Emergency Action Levels and corresponding classifications are included in EPIP 5.7.1, Emergency Classification.

Each successive classification is more severe. This classification system results in responses that are both timely and appropriate for a wide range of emergency conditions.

There are three principal advantages of the graded classification system:

- To assure timely notification of particular events which could lead to significant consequences should events continue to deteriorate, which might be indicative of more serious conditions not fully appreciated at the time of discovery.
- To provide an assessment of the actual or likely implications of the event which can be clearly communicated to various affected parties during the early stages of the event.
- To provide a means for setting in motion appropriate, prearranged, near-term emergency actions by affected parties.

4.1 CLASSIFICATIONS

The four classifications of emergencies are:

- NOTIFICATION OF UNUSUAL EVENT
- ALERT
- SITE AREA EMERGENCY
- GENERAL EMERGENCY

The fundamental logic connecting the four classifications of emergencies is to provide an escalating gradation of events related to the severity of their consequences.

Section 5 of the CNS Emergency Plan provides a description of the portions of the Emergency Response Organization which will be activated in the event of a NOTIFICATION OF UNUSUAL EVENT, ALERT, SITE AREA EMERGENCY, or GENERAL EMERGENCY.

4.1.1 NOTIFICATION OF UNUSUAL EVENT

- 4.1.1.1 Events are in process or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring off-site response or monitoring are expected unless further degradation of safety systems occurs. These types of events may progress to a more severe emergency classification if they are not mitigated. Therefore, appropriate off-site agencies will be notified of such events in order to be better prepared for response if the event should progress to a more severe classification.
- 4.1.1.2 The purpose of this classification and its associated off-site notifications is to assure that the first step in any response later found to be necessary has been initiated. This brings the operating staff into a state of readiness, and provides a systematic handling of information and decision-making. These conditions may not be particularly significant from an emergency or safety standpoint, but have the potential to increase in significance from a safety standpoint if proper action is not taken or if circumstances beyond the control of the operating staff render the situation more serious. Upon declaration of a NOTIFICATION OF UNUSUAL EVENT, key on-site personnel, as well as specified management within NPPD will be notified (see Section 7.4). The NOTIFICATION OF UNUSUAL EVENT is maintained until the event is terminated or an escalation to a more severe emergency class is required.
- 4.1.1.3 Table 4.1-1 lists Emergency Action Levels and Table 4.1-5 lists expected actions for the NOTIFICATION OF UNUSUAL EVENT classification.

4.1.2 ALERT

- 4.1.2.1 Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels. At this classification, minor releases of radioactivity may occur or may have occurred. Operator modification of station operating status is a probable corrective action if such modification has not already been accomplished by automatic protection systems.
- 4.1.2.2 Upon declaration of an ALERT, notifications will be made (see Section 7.4). Notifying off-site agencies at an ALERT classification assures emergency personnel are readily available to respond if the situation becomes more serious, or to perform confirmatory radiation monitoring, if required. The TSC, EOF, and OSC are manned and activated at the declaration of an ALERT.

4.1.2.3 The ALERT status is maintained until the event is downgraded, terminated, or escalated to a more severe emergency class.

4.1.2.4 Table 4.1-2 lists Emergency Action Levels and Table 4.1-6 lists expected actions for the ALERT classification.

4.1.3 SITE AREA EMERGENCY

4.1.3.1 Events are in process or have occurred which involve an actual or likely major failures of plant functions needed for protection of the public or HOSTILE ACTION that results in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) that prevent effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA Protective Action Guideline exposure levels beyond the site boundary. The SITE AREA EMERGENCY reflects conditions where there is a clear potential for significant releases of radioactive material, or such releases are in progress, but a core meltdown is not indicated based on current information.

4.1.3.2 Upon declaration of a SITE AREA EMERGENCY, non-ERO personnel are evacuated, monitoring teams are dispatched, off-site authorities are apprised of the emergency, the JIC is manned and activated, and periodic updates to the public are provided.

4.1.3.3 The SITE AREA EMERGENCY status is maintained until the event is downgraded, terminated, or escalated to a GENERAL EMERGENCY.

4.1.3.4 Table 4.1-3 lists Emergency Action Levels and Table 4.1-7 lists expected actions for the SITE AREA EMERGENCY classification.

4.1.4 GENERAL EMERGENCY

4.1.4.1 Events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels off-site for more than the immediate site area. The GENERAL EMERGENCY reflects conditions that may affect the general public. The GENERAL EMERGENCY declaration initiates pre-determined protective actions for the public, provides information to the appropriate state, local, and federal authorities, initiates additional measures as indicated by actual or potential releases, provides for coordination with off-site authorities, and provides periodic updates for the public.

- 4.1.4.2 Upon declaration of a GENERAL EMERGENCY, an automatic minimum protective action recommendation of evacuation for a 2-mile radius and 5 miles downwind, unless conditions make evacuation dangerous, and advise remainder of plume EPZ to go indoors to monitor EAS broadcasts will be made to state or local authorities. If conditions make evacuation dangerous, sheltering may be recommended as alternative protective action. Consider recommending evacuation of extended distances if conditions dictate.
- 4.1.4.3 The GENERAL EMERGENCY status is maintained until the event is downgraded or terminated.
- 4.1.4.4 Table 4.1-4 lists Emergency Action Levels and Table 4.1-8 lists expected actions for the GENERAL EMERGENCY classification.

4.2 OFF-SITE RADIOLOGICAL ASSESSMENT

- 4.2.1 The station will perform a preliminary assessment of the off-site consequences of an emergency. This preliminary assessment includes estimation by analytical methods of radiation dose rate, projected integrated dose for sectors and downwind distances, and a determination of the appropriate emergency classification.
- 4.2.2 The primary method for determining the radioactive release rate uses monitored release points. Effluent radiation monitor readings are available for the Elevated Release Point, Turbine Building Vent, Reactor Building Vent, and Radwaste/Augmented Radwaste Building Vents.
- 4.2.3 The elevated release point release rate can be determined by correlating the exposure rates on high range radiation monitors in the drywell to those which have been calculated assuming a Design Basis Loss of Coolant Accident (LOCA). The LOCA calculations are based on the NUREG-0737 assumptions that of the maximum full power equilibrium isotopic inventories, 100% of the noble gases, 25% of the halogens, and 1% of the remaining particulates are instantaneously released to the atmosphere of the primary containment. The entire release is assumed to be through the Standby Gas Treatment System and out the elevated release point. Other methods may be used as described in EPIP 5.7.16.
- 4.2.4 The dose rate and integrated dose are based on duration of release, release rates, meteorological data, and atmospheric dispersion factors.
- 4.2.5 The radioiodine concentration is obtained by multiplying the radioiodine release rate by the dispersion factor. The Committed Dose Equivalent (CDE) is determined by multiplying the air concentration by the exposure time and then by the dose conversion factor.
- 4.2.6 The noble gas concentration is obtained by multiplying the noble gas release rate by the dispersion factor. The Total Effective Dose Equivalent (TEDE) is determined by multiplying the air concentration by the exposure time and then by the appropriate dose conversion factor.

- 4.2.7 Upon activation of the EOF and the State Emergency Operations Centers, the affected state assumes primary responsibility for confirmatory and continuing off-site radiological assessment. This is accomplished by dispatching state Field Monitoring Teams and by analyzing data provided by the CNS Field Monitoring Teams. CNS will deploy Field Monitoring Teams for initial off-site monitoring prior to the arrival of responding State Field Monitoring Teams. These CNS teams may remain in the field to assist the state field monitoring teams.

4.3 SPECTRUM OF POSSIBLE ACCIDENTS AND INITIATING EVENTS

- 4.3.1 A number of accident scenarios which might occur at CNS have been analyzed in Chapter XIV of the CNS Updated Safety Analysis Report and within the Transnuclear NUHOMS Updated Final Safety Analysis Report for both severity of consequence and probability of occurrence. These types of accidents reflect the design characteristics of a Boiling Water Reactor and spent fuel storage installation and are addressed in Tables 4.1-1 through 4.1-4 and in EPIP 5.7.1 from the standpoint of initiating conditions, Emergency Action Levels, and subsequent emergency classification.

TABLE 4.1-1
NOTIFICATION OF UNUSUAL EVENT
EMERGENCY ACTION LEVELS (EALs)

EAL	(Alarm, Instrument Reading, etc.)	OPERATING MODE
AU1.1	Any valid gaseous monitor reading > Table A-1 column "UE" for ≥ 60 min. (Note 2).	ALL
AU1.2	Any valid liquid effluent monitor reading > Table A-1 column "UE" for ≥ 60 min. (Note 2).	ALL
AU1.3	Confirmed sample analyses for gaseous or liquid releases indicate concentrations or release rates > 2 x ODAM limits for ≥ 60 min. (Note 2).	ALL
AU2.1	Unplanned water level drop in the reactor cavity or spent fuel pool as indicated by <u>any</u> of the following: <ul style="list-style-type: none"> • LI-86 (calibrated to 1001' elev.) • Spent fuel pool low level alarm • Visual observation AND <ul style="list-style-type: none"> • Valid area radiation monitor reading rise on RMA-RA-1 or RMA-RA-2. 	ALL
AU2.2	Unplanned valid area radiation monitor reading or survey results rise by a factor of 1,000 over normal levels*. <p>*Normal levels can be considered as the highest reading in the past 24 hours excluding the current peak values.</p>	ALL
CU1.1	AC power capability to critical 4160V Buses 1F and 1G reduced to a single power source (Table C-4) for ≥ 15 min. such that any additional single failure would result in loss of all AC power to critical buses (Note 3).	MODES 4 or 5
CU2.1	RPV level cannot be restored and maintained > +3 in. for ≥ 15 min. (Note 3) due to RCS leakage.	MODE 4
CU2.2	Unplanned RPV level drop for ≥ 15 min. (Note 3) below, EITHER : <p>RPV flange (LI-86: 206 in. normal calibration, 113.75 in. elevated calibration) OR RPV level band when the RPV level band is established below the RPV flange.</p>	MODE 5
CU2.3	RPV level cannot be monitored with any unexplained RPV leakage indication, Table C-1.	MODE 5
CU3.1	Any unplanned event results in RCS temperature > 212°F due to loss of decay heat removal capability.	MODES 4 or 5
CU3.2	Loss of all RCS temperature and RPV level indication for ≥ 15 min. (Note 3).	MODES 4 or 5

TABLE 4.1-1
NOTIFICATION OF UNUSUAL EVENT
EMERGENCY ACTION LEVELS (EALs)

EAL	(Alarm, Instrument Reading, etc.)	OPERATING MODE
CU4.1	Loss of all Table C-2 on-site (internal) communication methods affecting the ability to perform routine operations OR Loss of all Table C-2 off-site (external) communication methods affecting the ability to perform off-site notifications.	MODES 4, 5, or DEFUELED
CU5.1	An unplanned sustained positive period observed on nuclear instrumentation.	MODES 4 or 5
CU6.1	< 105 VDC bus voltage indications on all Technical Specification required 125 VDC buses for ≥ 15 min. (Note 3).	MODES 4 or 5
FU1.1	Any loss or any potential loss of Primary Containment. (Table F-1)	MODES 1, 2, or 3
HU1.1	Seismic event identified by any two of the following: <ul style="list-style-type: none"> • The Seismic Monitor System free field sensor actuated or Alarm B-3/B-1 seismic event. • Earthquake felt in plant. • National Earthquake Information Center. 	ALL
HU1.2	Tornado striking within Protected Area boundary OR sustained high winds ≥ 100 mph.	ALL
HU1.3	Main turbine failure resulting in casing penetration or damage to turbine or generator seals.	ALL
HU1.4	Flooding in any Table H-1 area that has the potential to affect safety-related equipment required by Technical Specifications for the current operating mode.	ALL
HU1.5	High river/forebay water level > 899' MSL OR low river level/forebay < 870' MSL.	ALL
HU2.1	Fire in any Table H-1 area not extinguished within 15 min. of Control Room notification or receipt of a valid Control Room alarm due to fire (Note 3).	ALL
HU2.2	Explosion within the Protected Area.	ALL
HU3.1	Toxic, corrosive, asphyxiant, or flammable gases in amounts that have or could affect normal plant operations.	ALL
HU3.2	Recommendation by local, county, or state officials to evacuate or shelter site personnel based on an off-site event.	ALL
HU4.1	A security condition that does not involve a hostile action as reported by the Security Shift Supervisor OR a credible site-specific security threat notification OR a validated notification from NRC providing information of an aircraft threat.	ALL

TABLE 4.1-1
NOTIFICATION OF UNUSUAL EVENT
EMERGENCY ACTION LEVELS (EALs)

EAL	(Alarm, Instrument Reading, etc.)	OPERATING MODE
HU6.1	Other conditions exist which in the judgment of the Emergency Director indicate that EITHER : Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant OR a security threat to facility protection has been initiated. No releases of radioactive material requiring off-site response or monitoring are expected unless further degradation of safety systems occurs.	ALL
SU1.1	Loss of all off-site AC power (Table S-3) to critical 4160V Buses 1F and 1G for ≥ 15 min. (Note 3).	MODES 1, 2, or 3
SU2.1	An unplanned sustained positive period observed on nuclear instrumentation.	MODE 3
SU3.1	Plant is not brought to required operating mode within Technical Specifications LCO action statement time.	MODES 1, 2, or 3
SU4.1	Unplanned loss of > approximately 75% of annunciators or indicators associated with safety systems on Control Room Panels 9-3, 9-4, 9-5, and C for ≥ 15 min. (Note 3).	MODES 1, 2, or 3
SU5.1	SJAE monitor > $1.58\text{E}+3$ mR/hr.	MODES 1, 2, or 3
SU5.2	Coolant activity ≥ 4.0 $\mu\text{Ci/gm}$ dose equivalent I-131.	MODES 1, 2, or 3
SU6.1	Unidentified or pressure boundary leakage > 10 gpm OR Identified leakage > 30 gpm (Note 6).	MODES 1, 2, or 3
SU8.1	Loss of all Table S-2 on-site (internal) communications capability affecting the ability to perform routine operations OR loss of all Table S-2 off-site (external) communications methods affecting the ability to perform off-site notifications.	MODES 1, 2, or 3
EU1.1	Damage to a loaded cask confinement boundary.	N/A

TABLE 4.1-2
ALERT
EMERGENCY ACTION LEVELS (EALs)

EAL	(Alarm, Instrument Reading, etc.)	OPERATING MODE
AA1.1	Any valid gaseous monitor reading > Table A-1 column "Alert" for ≥ 15 min. (Note 2).	ALL
AA1.2	Any valid liquid effluent monitor reading > Table A-1 column "Alert" for ≥ 15 min. (Note 2).	ALL
AA1.3	Confirmed sample analyses for gaseous or liquid releases indicate concentrations or release rates > 200 x ODAM limits for ≥ 15 min. (Note 2).	ALL
AA2.1	Damage to irradiated fuel OR loss of water level (uncovering irradiated fuel outside the RPV) that causes EITHER of the following: Valid RMA-RA-1 Fuel Pool Area Rad reading > 5.0E+04 mR/hr OR valid RMP-RM-452 A-D Rx Bldg Vent Exhaust Plenum Hi-Hi alarm.	ALL
AA2.2	A water level drop in the reactor refueling cavity or spent fuel pool that will result in irradiated fuel becoming uncovered.	ALL
AA3.1	Dose rates > 15 mRem/hr in EITHER of the following areas requiring continuous occupancy to maintain plant safety functions: Main Control Room (RM-RA-20) OR CAS.	ALL
CA1.1	Loss of all off-site and all on-site AC power (Table C-4) to critical 4160V Buses 1F and 1G for > 15 min. (Note 3).	MODES 4, 5, or DEFUELED
CA2.1	RPV level < -42 in. OR RPV level cannot be monitored for ≥ 15 min. (Note 3) with any unexplained RPV leakage indication, Table C-1.	MODES 4 or 5
CA3.1	Any unplanned event results in EITHER : RCS temperature > 212°F for > Table C-3 duration (Note 4) OR RPV pressure increase > 10 psig due to a loss of RCS cooling.	MODES 4 or 5
FA1.1	Any loss or any potential loss of either Fuel Clad or RCS (Table F-1).	MODES 1, 2, or 3

TABLE 4.1-2
ALERT
EMERGENCY ACTION LEVELS (EALs)

EAL	(Alarm, Instrument Reading, etc.)	OPERATING MODE
HA1.1	Seismic event > 0.1g as indicated by the Seismic Monitor System free field sensor or Alarm B-3/A-1, EMERGENCY SEISMIC HIGH LEVEL, AND earthquake confirmed by any of the following: <ul style="list-style-type: none"> • Earthquake felt in plant. • National Earthquake Information Center. • Control Room indication of degraded performance of systems required for the safe shutdown of the plant. 	ALL
HA1.2	Tornado striking or high winds \geq 100 mph resulting in EITHER : Visible damage to any Table H-1 area structure containing safety systems or components OR Control Room indication of degraded performance of safety systems.	ALL
HA1.3	Main turbine failure-generated projectiles result in EITHER : Visible damage to or penetration of any Table H-1 area structure containing safety systems or components OR Control Room indication of degraded performance of safety systems.	ALL
HA1.4	Flooding in any Table H-1 area resulting in EITHER : An electrical shock hazard that precludes access to operate or monitor safety equipment OR Control Room indication of degraded performance of safety systems.	ALL
HA1.5	High river/forebay water level > 902' MSL OR low river/forebay level < 865' MSL.	ALL
HA1.6	Vehicle crash resulting in EITHER : Visible damage to any Table H-1 area structure containing safety systems or components OR Control Room indication of degraded performance of safety systems.	ALL
HA2.1	Fire or explosion resulting in EITHER : Visible damage to any Table H-1 area containing safety systems or components OR Control Room indication of degraded performance of safety systems.	ALL
HA3.1	Access to any Table H-1 area is prohibited due to toxic, corrosive, asphyxiant, or flammable gases which jeopardize operation of systems required to maintain safe operations or safely shutdown the reactor (Note 7).	ALL

TABLE 4.1-2
ALERT
EMERGENCY ACTION LEVELS (EALs)

EAL	(Alarm, Instrument Reading, etc.)	OPERATING MODE
HA4.1	A hostile action is occurring or has occurred within the Owner Controlled Area as reported by the Security Shift Supervisor OR a validated notification from NRC of an airliner attack threat within 30 min. of the site.	ALL
HA5.1	Procedure 5.1ASD, Alternate Shutdown, or Procedure 5.4FIRE-S/D, Fire Induced Shutdown From Outside the Control Room, requires Control Room evacuation.	ALL
HA6.1	Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve EITHER : An actual or potential substantial degradation of the level of safety of the plant OR a security event that involves probable life threatening risk to site personnel or damage to site equipment because of hostile action. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels beyond the site boundary.	ALL
SA1.1	AC power capability to critical 4160V Buses 1F and 1G reduced to a single power source (Table S-3) for > 15 min. such that any additional single failure would result in loss of all AC power to critical buses (Note 3).	MODES 1, 2, or 3
SA2.1	An automatic scram failed to shut down the reactor AND manual actions taken at the reactor control console (Note 5) successfully shut down the reactor as indicated by reactor power < 3%.	MODES 1 or 2
SA4.1	Unplanned loss of > approximately 75% of annunciators or indicators associated with safety systems on Control Room Panels 9-3, 9-4, 9-5, and C for ≥ 15 min. (Note 3) AND EITHER : Any significant transient is in progress, Table S-1 OR Compensatory indications are unavailable.	MODES 1, 2, or 3

TABLE 4.1-3
SITE AREA EMERGENCY
EMERGENCY ACTION LEVELS (EALs)

EAL	(Alarm, Instrument Reading, etc.)	OPERATING MODE
AS1.1	Any valid gaseous monitor reading > Table A-1 column "SAE" for ≥ 15 min. (Note 1).	ALL
AS1.2	Dose assessment using actual meteorology indicates doses > 0.1 Rem TEDE or > 0.5 Rem thyroid CDE at or beyond the site boundary.	ALL
AS1.3	Field survey indicates closed window dose rates > 0.1 Rem/hr that is expected to continue for ≥ 60 min. at or beyond the site boundary (Note 1) OR field survey sample analysis indicates thyroid CDE > 0.5 Rem for 1 hr of inhalation at or beyond the site boundary.	ALL
CS2.1	With Containment Closure not established, RPV level < -48 in. (Note 4).	MODES 4 or 5
CS2.2	With Containment closure established (Note 4), RPV level < -158 in. (Note 4).	MODES 4 or 5
CS2.3	RPV level cannot be monitored for ≥ 30 min. (Note 3) with a loss of inventory as indicated by EITHER : Unexplained RPV leakage indication, Table C-1, OR Erratic Source Range Monitor indication.	MODES 4 or 5
FS1.1	Loss or potential loss of any two barriers (Table F-1).	MODES 1, 2, or 3
HS4.1	A hostile action is occurring or has occurred within the Protected Area as reported by the Security Shift Supervisor.	ALL
HS5.1	Control Room evacuation has been initiated AND control of the plant cannot be established within 15 min.	ALL

TABLE 4.1-3
SITE AREA EMERGENCY
EMERGENCY ACTION LEVELS (EALs)

EAL	(Alarm, Instrument Reading, etc.)	OPERATING MODE
HS6.1	<p>Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve EITHER:</p> <p>An actual or likely major failures of plant functions needed for protection of the public OR Hostile action that results in intentional damage or malicious acts; 1) toward site personnel or equipment that could lead to the likely failure of or; 2) that prevent effective access to equipment needed for the protection of the public.</p> <p>Any releases are not expected to result in exposure levels which exceed EPA Protective Action Guideline exposure levels (1 Rem TEDE and 5 Rem thyroid CDE) beyond the site boundary.</p>	ALL
SS1.1	Loss of all off-site and all on-site AC power (Table S-3) to critical 4160V buses 1F and 1G for ≥ 15 min. (Note 3).	MODES 1, 2, or 3
SS2.1	An automatic scram failed to shut down the reactor AND manual actions taken at the reactor control console (Note 5) do not shut down the reactor as indicated by reactor power $\geq 3\%$.	MODES 1 or 2
SS4.1	Loss of $>$ approximately 75% of the annunciators or indicators associated with safety systems on Control Room Panels 9-3, 9-4, 9-5, and C for ≥ 15 min. (Note 3) AND any significant transient is in-progress, Table S-1 AND compensatory indications are unavailable.	MODES 1, 2, or 3
SS7.1	< 105 VDC bus voltage indications on all vital 125 VDC buses (1A and 1B) for ≥ 15 min. (Note 3).	MODES 1, 2, or 3

TABLE 4.1-4
GENERAL EMERGENCY
EMERGENCY ACTION LEVELS (EALs)

EAL	(Alarm, Instrument Reading, etc.)	OPERATING MODE
AG1.1	Any valid gaseous monitor reading > Table A-1 column "GE" for ≥ 15 min. (Note 1).	ALL
AG1.2	Dose assessment using actual meteorology indicates doses > 1 Rem TEDE or > 5 Rem thyroid CDE at or beyond the site boundary.	ALL
AG1.3	Field survey results indicate closed window dose rates > 1 Rem/hr expected to continue for ≥ 60 min. at or beyond the site boundary (Note 1) OR analyses of field survey samples indicate thyroid CDE > 5 Rem for 1 hr of inhalation at or beyond the site boundary.	ALL
CG2.1	RPV level < -158 in. for ≥ 30 min. (Note 3) AND any Containment Challenge indication, Table C-5.	MODES 4 or 5
CG2.2	RPV level cannot be monitored for ≥ 30 min. (Note 3) with core uncover indicated by EITHER : Unexplained RPV leakage indication, Table C-1 OR Erratic Source Range Monitor indication AND any Containment Challenge indication, Table C-5.	MODES 4 or 5
FG1.1	Loss of any two barriers AND loss or potential loss of third barrier (Table F-1).	MODES 1, 2, or 3
HG4.1	A hostile action has occurred such that plant personnel are unable to operate equipment required to maintain safety functions OR a hostile action has caused failure of Spent Fuel Cooling Systems and imminent fuel damage is likely for a freshly off-loaded reactor core in pool.	ALL
HG6.1	Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve EITHER : Actual or imminent substantial core degradation or melting with potential for loss of containment integrity OR hostile action that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels (1 Rem TEDE and 5 Rem thyroid CDE) beyond the site boundary.	ALL

TABLE 4.1-4
GENERAL EMERGENCY
EMERGENCY ACTION LEVELS (EALs)

EAL	(Alarm, Instrument Reading, etc.)	OPERATING MODE
SG1.1	<p>Loss of all off-site and all on-site AC power (Table S-3) to critical 4160V buses 1F and 1G AND EITHER:</p> <p>Restoration of at least one emergency bus in < 4 hours is not likely OR RPV level cannot be restored and maintained > -158 in. or cannot be determined.</p>	MODES 1, 2, or 3
SG2.1	<p>Automatic and all manual scrams were not successful AND Reactor power $\geq 3\%$ AND EITHER of the following exist or have occurred due to continued power generation:</p> <p>RPV level cannot be restored and maintained > -183 in. or cannot be determined OR Average torus water temperature and RPV pressure cannot be maintained within the Heat Capacity Temperature Limit (EOP/SAG Graph 7).</p>	Modes 1 or 2

TABLE 4.1-5

NOTIFICATION OF UNUSUAL EVENT - EXPECTED ACTIONS

CNS ACTIONS

1. Notify responsible State and Local Governmental Agencies of emergency conditions within 15 minutes of declaration.
2. Notify the ERO if determined to be necessary by the Emergency Director.
3. Augment on-shift resources as needed.
4. Assess and respond.
5. Terminate with verbal summary to off-site authorities, followed by written report within 24 hours.

OR

6. Escalate to a more severe class.

STATE/LOCAL ACTIONS

1. Provide assistance if requested (fire, security, medical, etc.).
2. Continue notification as necessitated by situation.
3. Standby until verbal termination.

OR

4. Escalate to a more severe class.

TABLE 4.1-6

ALERT - EXPECTED ACTIONS

CNS ACTIONS

1. Notify responsible State and Local Governmental Agencies of emergency conditions within 15 minutes of declaration.
2. Notify the ERO, augment resources and activate TSC, OSC, and EOF. The JIC may be placed on standby status.
3. Assess and respond.
4. Dispatch on-site monitoring teams with associated communications.
5. Provide periodic plant status updates to off-site authorities.
6. Provide periodic meteorological assessments to off-site authorities and, if releases are occurring, dose estimates for actual releases.
7. Close out or recommend reduction in Emergency Class by verbal summary to off-site authorities followed by written summary within 8 hours of closeout or class reduction.

OR

8. Escalate to a more severe class.

STATE/LOCAL ACTIONS

1. Provide assistance if requested (fire, security, medical, etc.).
2. Augment resources and bring primary response centers to stand-by status.
3. Place key emergency personnel (including monitoring teams and associated communications) on stand-by status.
4. If necessary, Governor proclaims Disaster Emergency Condition. Dispatch State Field Command Post and key emergency response personnel including Radiological Monitoring Teams with associated equipment and communications. Alert all state agencies and local government to standby or assume an increased readiness posture.
5. Provide confirmatory off-site radiation monitoring and ingestion pathway dose projections if actual releases substantially exceed Off-Site Dose Assessment Manual (ODAM) limits.
6. Maintain ALERT status until verbal termination.

OR

7. Escalate to a more severe class.

TABLE 4.1-7
SITE AREA EMERGENCY - EXPECTED ACTIONS

CNS ACTIONS	STATE/LOCAL ACTIONS
<div><div>1.</div><div>Notify responsible State and Local Governmental Agencies of emergency conditions within 15 minutes of declaration.</div></div> <div><div>2.</div><div>Notify the ERO, augment resources by activating TSC, OSC, EOF and JIC.</div></div> <div><div>3.</div><div>Assess and respond.</div></div> <div><div>4.</div><div>Dispatch on-site and off-site monitoring teams with communications equipment.</div></div> <div><div>5.</div><div>Provide a dedicated individual for plant status updates to off-site authorities and periodic press briefings.</div></div> <div><div>6.</div><div>Make Senior Technical and Management staff on-site available for consultation with NRC and state representatives on a periodic basis.</div></div> <div><div>7.</div><div>Provide meteorological data and dose estimates (for actual releases) to off-site authorities via a designated individual.</div></div> <div><div>8.</div><div>Provide release and dose projections based on available plant condition information or contingencies.</div></div> <div><div>9.</div><div>Closeout or recommend reduction in emergency class by briefing off-site authorities at EOF followed by written summary within 8 hours of closeout or class reduction.</div></div>	<div><div>1.</div><div>Provide assistance as requested in accordance with established disaster support procedures.</div></div> <div><div>2.</div><div>If In-House Shelter is desirable, activate public notification systems within at least two miles of the plant.</div></div> <div><div>3.</div><div>Provide the public within the plume exposure EPZ with periodic updates on emergency status.</div></div> <div><div>4.</div><div>Augment resources by activating state/local EOCs.</div></div> <div><div>5.</div><div>Dispatch key on-site emergency personnel, including monitoring teams and communications equipment.</div></div> <div><div>6.</div><div>Alert other personnel to standby status (e.g., those needed for traffic control or evacuation) and dispatch personnel to near-site duty station.</div></div> <div><div>7.</div><div>Provide off-site monitoring results to CNS and jointly assess them.</div></div> <div><div>8.</div><div>Continuously assess information from CNS and off-site monitoring teams with regard to initiating/modifying public protective actions.</div></div> <div><div>9.</div><div>Recommend placing milk animals within two miles on stored feed and assess need to extend distance.</div></div> <div><div>10.</div><div>Provide press briefings, perhaps jointly with CNS.</div></div> <div><div>11.</div><div>Maintain SITE AREA EMERGENCY status until termination or reduction of emergency class.</div></div>
OR	
<div><div>10.</div><div>Escalate to GENERAL EMERGENCY.</div></div>	
OR	
	<div><div>12.</div><div>Escalate to GENERAL EMERGENCY</div></div>

TABLE 4.1-8

GENERAL EMERGENCY - EXPECTED ACTIONS

CNS ACTIONS

1. Notify responsible State and Local Governmental Agencies of emergency conditions within 15 minutes of declaration.
2. Notify the ERO, augment resources by activating TSC, OSC, EOF, and JIC.
3. Recommend protective action of evacuation for a 2-mile radius and 5 miles downwind, unless conditions make evacuation dangerous, and advise remainder of plume EPZ to go indoors to monitor EAS broadcasts to State and Local Authorities. Consider recommending evacuation of extended distances if degrading conditions warrant.
4. Assess and respond.
5. Dispatch on-site and off-site monitoring teams and associated communications equipment.
6. Provide a dedicated individual for plant status updates to off-site authorities and periodic press briefings. Coordinate joint information releases with off-site authorities.
7. Make Senior Technical and Management Staff available for periodic consultation with NRC and state representatives.
8. Provide meteorological data and dose estimates (for actual releases) to off-site authorities via a dedicated individual.
9. Provide release and dose projections based upon available plant condition information and foreseeable contingencies.
10. Terminate (or recommend reduction of) emergency class by briefing off-site authorities at the EOF, followed by written summary within 8 hours.

STATE/LOCAL ACTIONS

1. Provide any assistance requested in accordance with established disaster support procedures.
2. Initiate immediate public notification of GENERAL EMERGENCY status and provide periodic public updates.
3. Recommend evacuation for a 2-mile radius and a 5-mile direct downwind segment and assess the need to extend distances if conditions degrade.
4. Augment resources by activating state/local primary response centers.
5. Dispatch other emergency personnel to duty stations within 5-mile radius and alert others to standby status.
6. Provide off-site monitoring results to CNS, DOE, EPA, and others and jointly assess them.
7. Continuously assess information from CNS and off-site monitoring teams with regard to modifying public protective actions and mobilizing evacuation resources.
8. Recommend placing milk animals within 10-mile radius on stored feed and assess need to extend distance.
9. Provide press briefings, perhaps jointly with CNS.
10. Maintain GENERAL EMERGENCY status until termination or reduction of emergency class.

5. ORGANIZATIONAL CONTROL OF EMERGENCIES

In the event of an emergency, NPPD has both the normal operating organization (on-shift Control Room staff) and an organization specifically designed to augment them. The Emergency Response Organization may, depending upon the classification of the accident, range from the normal operating staff to a comprehensive emergency force composed of on-site, general office, state, and local support, and contract personnel.

This section of the Emergency Plan describes the normal on-shift Operating organization, the Emergency Response Organization, other support available, and the governmental agencies responsible for dealing with off-site emergency conditions. Post-emergency station recovery plans are presented in Section 9. A general overview of the Nuclear Power Group Organization is described in the USAR.

5.1 NORMAL OPERATING ORGANIZATION

Direct operation and control of the Nuclear Power Plant is the responsibility of the on-duty Operations Crew operating out of the Control Room. The normal operating crew is staffed and qualified to perform all actions necessary to institute immediate protective measures and to implement the Emergency Plan. The composition and relationship of the Control Room crew (Normal Operating Organization) is depicted in Figure 5.2-1.

5.1.1 LINES OF AUTHORITY

- 5.1.1.1 The Shift Manager is the senior licensed individual on the operating crew. The Shift Manager must hold a Senior Reactor Operator's license.
- 5.1.1.2 If the Shift Manager is incapacitated the Control Room Supervisor assumes the Shift Manager role. The Control Room Supervisor must also hold a Senior Reactor Operator's license.
- 5.1.1.3 Reactor Operators (Control Room Operators) report to the Control Room Supervisor. Reactor Operators must hold a Reactor Operator's license
- 5.1.1.4 Station Operators and Utility/Fire Brigade personnel function under the direction of Reactor Operators or the Control Room Supervisor. Station Operators and Utility/Fire Brigade do not require a license.
- 5.1.1.5 The Chem/RP Technician reports to the Shift Manager.
- 5.1.1.6 The Shift Technical Engineer reports to the Shift Manager.
- 5.1.1.7 The Dose Assessor reports to the Shift Manager.
- 5.1.1.8 The Shift Communicator reports to the Shift Manager.

5.1.2 RESPONSIBILITIES/FUNCTIONS

- 5.1.2.1 The Shift Manager is the individual, on-shift at all times, vested with the authority and responsibility to immediately and unilaterally initiate any emergency actions, including protective action recommendations to authorities responsible for implementing off-site emergency measures. Upon declaration of an emergency, the Shift Manager becomes the site Emergency Director. The Emergency Director is responsible for, and may not delegate, classifying emergencies, ensuring notifications are made to off-site authorities, and recommending protective actions to off-site authorities.

The Shift Manager is responsible for providing guidance and support to the operating crew. He will ensure that there is an adequate staff to perform the required operational functions and be responsible for ensuring proper communications from the Control Room to the TSC, OSC, and EOF. In conjunction with key technical personnel, he will also assess station operations and ensure recommended corrective actions are given adequate consideration. He will also control and monitor station conditions, take corrective actions to mitigate or terminate the incident, stabilize the plant, and minimize accident consequences. Upon entry into Severe Accident Guidelines, the Shift Manager shall take direction for accident mitigation from the Operations Coordinator in the TSC.

Upon activation of the EOF, the on-call Emergency Director will relieve the Shift Manager of Emergency Director duties.

- 5.1.2.2 The Control Room Supervisor (CRS) directs the activities of the Control Room Operators and Station Operators in response to normal, abnormal, and emergency procedures. The CRS functions as the primary command and control interface between the Shift Manager and other Operations Shift personnel.
- 5.1.2.3 Reactor Operators (Control Room Operators) are responsible for the safe operation of the reactor and balance of plant.
- 5.1.2.4 Station Operators are responsible to the Control Room Supervisor. Station Operators perform functions in the plant such as equipment monitoring, log keeping, equipment operation, and tag-outs.
- 5.1.2.5 The Chem/RP Technician is responsible for providing advice and assistance to the crew regarding radiological issues.
- 5.1.2.6 The Shift Communicator is responsible for all off-site communication duties.
- 5.1.2.7 The Dose Assessor has the primary responsibility for performing Dose Assessment on-shift.

5.1.2.8 The Shift Technical Engineer serves in an advisory capacity to the Shift Manager in the diagnosis of off-normal events, transients, and accident situations. The Shift Technical Engineer functions to provide an independent assessment of the operation and response of the plant. The STE may perform other functions as assigned, so long as they do not interfere with this oversight role.

Upon declaration of an emergency (Alert or higher), two additional positions become available to the Control Room. They are part of the ERO (described below) but function from the Control Room, therefore are described here.

5.1.2.9 The Technical Communicator provides a flow of technical data to the OPS/EOP Advisors in the TSC and EOF, and the Technical Communicator in the OSC.

5.1.2.10 The Control Room Logkeeper maintains an accurate log of important Control Room activities.

5.2 EMERGENCY RESPONSE ORGANIZATION

Key elements of the Emergency Response Organization (ERO) at CNS are depicted in Figures 5.2-2, 5.2-3, and 5.2-4.

Emergency Response Organization (ERO) positions in the TSC, OSC, and EOF, along with functions for these facilities are summarized in the following paragraphs. Sufficient personnel have been designated to assure that functional responsibilities are maintained for continuous 24-hour operation. The Emergency Response Organization roster is maintained by the Emergency Preparedness Department.

The Emergency Response Organization operates from the Control Room and the following Emergency Response Facilities. These CNS emergency Response Facilities will be activated within approximately one (1) hour following the declaration of an Alert or higher.

- Technical Support Center.
- Operational Support Center or alternate.
- Emergency Operations Facility.

The Emergency Response Organization is supported by the following Emergency Response Facility as necessary:

- Joint Information Center.

The TSC, EOF, and OSC will be manned and activated at the declaration of an ALERT or higher level emergency. The JIC may be placed on standby during an ALERT, and will be manned and activated upon the declaration of a SITE AREA EMERGENCY or GENERAL EMERGENCY.

In all emergency classifications, the Emergency Director is in charge of the Emergency Response Organization. The Emergency Director is assigned the authority and responsibility to immediately and unilaterally initiate emergency response actions. **The Emergency Director may not delegate the following:**

- Event Declaration.
- The decision to notify authorities responsible for off-site emergency measures.
- Recommend protective actions to authorities responsible for off-site emergency measures.

Under a NOTIFICATION OF UNUSUAL EVENT, all emergency response functions will usually be conducted from the Control Room by the on-shift Operating organization described in Section 5.1. At an ALERT, the TSC, EOF, and OSC will be activated and will provide further management, technical, and craft support. At a SITE AREA EMERGENCY or GENERAL EMERGENCY, the JIC is activated and will have the additional support of the JIC Director. The authorities and responsibilities of each position are as follows:

5.2.1 EMERGENCY DIRECTOR

The Emergency Director is in command of the NPPD Emergency Response Organization. His/her responsibilities are as follows:

- Verify that the NPPD on-site and off-site emergency response functions are being performed in a timely manner.
- Ensure that adequate technical and logistical support is available to the station organization.
- Ensure continuity of emergency response resources.

All emergency actions which may involve exposures exceeding occupational exposure limits must be approved by the Emergency Director.

The Emergency Director provides management expertise to the emergency organization and may initially report to the Control Room instead of the EOF. As the situation warrants, he may relocate to any on-site facility to confer with members of the various emergency response organizations. The Emergency Director will be supported by the following positions:

5.2.2 TSC DIRECTOR

The TSC Director is in charge of TSC functions and activities. His/her primary responsibility is to maintain command and control in the TSC to provide technical assistance and recommendations to the Control Room.

The primary function of the TSC staff is to augment Control Room efforts to manage the plant emergency by:

- Diagnosing station conditions.
- Recommending and prioritizing corrective or mitigative actions.
- Providing technical support to Control Room personnel.

The TSC Director is assisted in these functions by Individuals assuming the minimum staff ERO positions below and depicted in Figure 5.2-2.

- 5.2.2.1 The Operations Coordinator provides a liaison between the Control Room and the TSC/OSC Staffs, on personnel, technical, and administrative issues related to plant operations. Upon entry into Severe Accident Guidelines, the Operations Coordinator shall assume decision-making authority from the Shift Manager related to accident mitigation actions and provide direction to the Control Room operating staff.
- 5.2.2.2 The Engineering Coordinator provides engineering expertise to the TSC Director. He/she shall also coordinate the activities of the Engineering Group through the Engineering Team Leader. The Engineering Coordinator will maintain liaison with General Electric, POWER Engineers (formerly Burns & Roe, Inc.), Institute of Nuclear Power Operations, and other contract support as referenced in Section 5.3.3.
- 5.2.2.3 The Maintenance Coordinator provides expertise to the TSC Director in the areas of equipment analysis/status, repair options, and equipment repair priorities. The Maintenance Coordinator also supervises the activities of the OSC as directed by TSC Director through the OSC Supervisor.
- 5.2.2.4 The Chemistry/Radiological Protection Coordinator provides chemistry and radiological protection expertise to the TSC Director and is also responsible for the following:
- Assess radiological dose, recommend radiation protection measures, direct radiological surveys and decontamination actions, and assist in assessment of off-site consequences.
 - Provide chemical analyses for the evaluation of station systems and provide data to aid in the determination of reactor core conditions and release potentials.

- This individual is assisted by other radiological personnel. These emergency response personnel will provide technical expertise on radiological release rates and dose projections, in plant radiological surveys, and will input data into the dose assessment model, when required.

NOTE – The additional Key Functional staff, and other positions listed below, enhance the operation of the TSC.

- 5.2.2.5 The ENS Communicator will provide continuous communication with the NRC when requested to do so.
- 5.2.2.6 The Operations/EOP Advisor provides technical assistance and operational information to the Operations Coordinator. He/she maintains a proactive assessment of EOP and SAG implementation as well as performs plant condition assessments.
- 5.2.2.7 The Engineering Team Leader directs the efforts of the Engineering group based on the direction and priorities established by the TSC Director and Engineering Coordinator.
- 5.2.2.8 The Electrical Engineer provides information on station electrical system capabilities, status, alternate power arrangements, and evaluates the necessity of repair, installation, and modification of electrical equipment. The Electrical Engineer will also provide information on I&C issues.
- 5.2.2.9 The Mechanical Engineer performs analyses on mechanical components and provides information on various mechanical systems capabilities, status, and evaluates the necessity of repair, installation, or modification of mechanical equipment.
- 5.2.2.10 The Civil Engineer provides information and analysis on station component structural status and integrity.
- 5.2.2.11 The Reactor Engineer provides information and analysis on the conditions of the reactor core.
- 5.2.2.12 The Function Status Assessment Engineer evaluates the availability of plant systems which may be used to perform functions specified in the Plant Specific Technical Guidelines/Severe Accident Technical Guidelines.
- 5.2.2.13 The Control Parameter Assessment Engineer evaluates the availability of instrumentation used to determine values of the Emergency Operation Procedures/Severe Accident Guideline control parameters.
- 5.2.2.14 The Security Coordinator provides security plan knowledge and expertise. Coordinates all security related response activities including initial and continuous accountability of personnel when required per EPIP 5.7.10. The Security Coordinator may be assisted by other members of the CNS Security force.

5.2.2.15 The Facility Logkeeper maintains an accurate log of important TSC functions and also maintains/updates the display of priority work items.

5.2.2.16 The Administrative Assistant provides administrative support such as faxing, copying, and material needs.

5.2.3 EOF DIRECTOR

The EOF Director is in charge of the EOF functions and responsibilities, including ensuring the EOF is capable of supporting the Emergency Director's management of the overall licensee emergency response.

The primary functions of the EOF staff are to provide assistance to the Emergency Director, coordination of emergency off-site response activities, and to provide support to the responding off-site support agencies by:

- Coordinating radiological and environmental assessment.
- Determining and recommending protective actions for the public.
- Coordinating emergency response activities with Federal, State, and Local agencies.
- Event classification and continual assessment of plant conditions related to classification.
- Notification to off-site authorities.

The EOF Director is assisted in these functions by individuals assuming the minimum staff ERO positions below and depicted in Figure 5.2-3.

5.2.3.1 The Radiological Control Manager provides radiological information and recommendations to the Emergency Director and/or EOF Director with regard to dose assessment, protective actions, and the use of Potassium Iodide. The Radiological Control Manager is assisted by and directs the activities of the Radiological Assessment Supervisor. Additional duties include interfacing with appropriate State and Local Dose Assessment Groups.

5.2.3.2 The Radiological Assessment Supervisor assists the Radiological Control Manager in determining potential or actual impacts of radiological releases, developing protective action recommendations, and coordinating the activities of the Field Monitoring Teams. This is accomplished by supervising the activities of the Field Team Coordinator and Dose Assessment Coordinator located in the EOF Dose Assessment Room.

5.2.3.3 The Off-Site Communicator is responsible for gathering and disseminating information to appropriate Off-Site Agencies in accordance with EPIP 5.7.6.

NOTE – The additional Key Functional staff and other positions listed below enhance the operation of the EOF.

- 5.2.3.4 The Operations/EOP Advisor provides technical assistance and operational information to the Emergency Director and/or EOF Director.
- 5.2.3.5 The Field Team Coordinator coordinates the movement and sampling activities of the CNS Field Monitoring Teams as directed by the Radiological Assessment Supervisor.
- 5.2.3.6 The Dose Assessment Coordinator coordinates dose assessment activities as directed by the Radiological Assessment Supervisor. This individual has to be familiar with source term data, release data, meteorological information, and other dose assessment parameters.
- 5.2.3.7 The Dose Assessment Clerk performs dose assessment as instructed by the Dose Assessment Coordinator using assessment methods as described in Section 6.3.3.
- 5.2.3.8 The Field Monitoring Team Vehicle Driver drives the field monitoring team vehicle.
- 5.2.3.9 The Field Monitoring Teams are composed of at least one individual selected from a pool of personnel knowledgeable and experienced in radiation protection as defined by ANSI Standard 18.1, and trained in sampling techniques and analysis in accordance with the Emergency Preparedness Training Program. They are familiar with the equipment and methods to be used to perform plume-tracking and media sampling due to previous experience in radiological protection. Other CNS personnel may act as vehicle drivers or assistants.
- 5.2.3.10 The Logistics Coordinator is responsible for providing on-going EOF security and accountability, food/lodging/transportation support, and coordinating the capability of 24 hour continuous operations staffing.
- 5.2.3.11 The Emergency Preparedness Coordinator assists with activation of the Emergency Response Facilities and ensures that ERO personnel are performing their duties as defined by the Emergency Plan, EIPs, and Positional Instructional Manuals.
- 5.2.3.12 The Clerical Coordinator ensures that sufficient clerical support exists in the EOF to adequately support EOF personnel.
- 5.2.3.13 The Facility Logkeeper maintains an accurate log of all important EOF activities, and also maintains and updates the display of EOF priority work items.

5.2.4 OPERATIONAL SUPPORT CENTER (OSC) SUPERVISOR

The OSC Supervisor is in charge of OSC functions and activities. His/her primary responsibility is to assure work items assigned to the OSC, based on the direction and priorities established by the TSC and assigned by the Maintenance Coordinator, are carried out.

The OSC is located adjacent to the TSC. Functional assignments at the OSC, coordinated from the TSC are:

- Operating staff support.
- Radiation surveys and decontamination.
- Maintenance, repair, and damage control.
- Chemistry.
- Re-entry, search, and rescue.

The OSC Supervisor is assisted in these functions by individuals assuming the minimum staff ERO positions described below and depicted in Figure 5.2-4.

- Electricians (2).
- I&C Technicians (2).
- Mechanics (2).
- Radiation Protection Technicians (6).

The additional Key Functional staff and other positions listed below enhance the operation of the OSC.

OSC Leads listed below work together to assign emergency mitigation work activities to available OSC personnel best suited in performance of the assigned task. The OSC Leads work as a multi-disciplinary team to assemble, brief, and dispatch teams. They are also responsible for monitoring the progress of the respective teams, overseeing their safety, and debriefing them upon completion of their assigned tasks.

- Chemistry/Radiological Protection Lead.
- I&C Lead.
- Electrical Lead.
- Mechanical Lead.
- Utility Lead.
- An OSC Clerk provides clerical support such as logkeeping, faxing, copying, and material requisition, to the OSC Staff.
- The Technical Communicator provides a flow of technical data from the Technical Communicator in the Control Room to the OSC.

The OSC also contains a pool of trained personnel with expertise from their normal day-to-day activities. The following are examples of these additional personnel from which teams may be assembled:

- Welders/Plumbers/Machinists.
- Chemistry Technicians.
- Utility/Tool Crib.
- Warehouse Personnel.
- Operators.
- Engineers.

5.3 OFF-SITE EMERGENCY ORGANIZATION

The Emergency Plan is designed to be implemented in a step-by-step fashion as site needs dictate. The off-site capabilities activated by this plan will have pre-assigned duties meant to relieve site personnel of off-site related responsibilities as soon as practical. This shifting of responsibilities will take place rapidly and formally as the emergency evolves and will relieve site personnel needed for in-plant activities.

NPPD employees located at the General Office or other NPPD facilities may be used to form a technical manpower pool from which technical support may be drawn. These employees may be utilized by virtue of their normal job position, availability, or personal qualifications.

5.3.1 JOINT INFORMATION CENTER (JIC)

The JIC is a media briefing area and is located adjacent to the EOF at 902 Central Avenue in Auburn, NE.

The principal functions of the JIC include:

- Coordinating the development and dissemination of information to the news media.
- Conducting media monitoring.
- Maintaining rumor control.
- Providing NPPD employees with information concerning the emergency.

The staffing of the JIC will be dependent upon the type of emergency situation at CNS. A minimum staffing level, described below and depicted in Figure 5.3-1, will ensure principal functions of the JIC can be accomplished:

- 5.3.1.1 The JIC Director directs personnel in preparation of position statements, interviews, and dissemination of information to employees, participants, industry organizations, legislative representatives, and members of the Board of Directors. He/she is also responsible for generating news releases and is responsible for ensuring that the information authentication function is being performed.

- 5.3.1.2 The Technical Briefer will assist the JIC Director by receiving and relaying technical information. He/she is also responsible for advising the JIC Director in matters regarding Tech Specs, USAR, EOPs and EIPs.
- 5.3.1.3 The Public Information Officer prepares releases for the news media and provides support to the Designated Spokesperson. He/she also coordinates with Public Information Officers from other agencies, responds to inquiries from the public, and assists with other JIC activities as necessary.

To enhance the effectiveness of the JIC, the JIC Management Staff is also supported by the following Key Functional and other positions:

- Facility Manager.
- Media Monitor.
- Designated Spokesperson.
- Rumor Control Coordinator.
- Employee Information Coordinator.
- JIC Clerical Coordinator.
- JIC Logkeeper.
- Rumor Control Staff (NPPD Centralized Customer Care Center).

5.3.2 PUBLIC INFORMATION SUPPORT

Emergency public information will be coordinated and released through the Joint Information Center (JIC).

Public information releases to the news media will be channeled through the JIC. Accurate and timely information on emergency conditions will be transmitted to JIC personnel. Coordinated news conferences will be conducted by Public Information Officers representing NPPD, as well as Federal, State, and Local Agencies. Provisions are made for a question and answer exchange.

The NPPD Designated Spokesperson located at the JIC is responsible for ensuring that information pertaining to events at CNS is properly transmitted to the news media. The Designated Spokesperson or JIC Staff will be in contact with personnel in the EOF and will organize and distribute the technical information for use in media briefings and news releases.

5.3.3 CONTRACT SUPPORT

In addition to General Office support, the CNS Emergency Response Organization may draw on outside support. Letters of Agreement with organizations which may provide assistance to NPPD are listed in Appendix D.

A brief description of this contract support is provided below.

5.3.3.1 MANPOWER AND EQUIPMENT AUGMENTATION

The Institute of Nuclear Power Operations, as an organization serving the nuclear industry, has organized a response plan for nuclear power plant emergencies. Manpower and equipment may be requested from institute members to augment on-site capabilities.

5.3.3.2 TECHNICAL SUPPORT

The General Electric Company has organized a Boiling Water Reactor Emergency Support Program. This program provides for an Emergency Response Team composed of personnel with appropriate technical disciplines, which will report to NPPD upon request. A Technical Support Team is also established at General Electric Nuclear Headquarters in Wilmington, North Carolina. Communications between the CNS Emergency Response Organization and General Electric will enhance technical assistance to the station.

In the event CNS needs additional technical support, NPPD has made arrangements with the following organizations:

- POWER Engineers (formerly Burns & Roe).
- CB&I - Stone & Webster.

5.3.3.3 RADIOLOGICAL MONITORING AND ANALYSIS SUPPORT

Arrangements have been made with Omaha Public Power District's Fort Calhoun Nuclear Station to provide monitoring equipment and personnel trained to use this equipment, contingent on the manpower, equipment, and supplies that are available at the time of the request for assistance. Additionally, Fort Calhoun Station is a decommissioning plant and staffing reductions may limit the total number of personnel available for assistance. The Radiochemistry Laboratory at the Fort Calhoun Station is able to perform backup radioisotopic analyses of monitoring samples. If the emergency is such that more monitoring equipment and personnel are needed, resources such as the Institute of Nuclear Power Operations may be requested.

Emergency service is available from the current dosimetry vendor which includes extra dosimetry, instrumentation, and technical assistance.

5.4 PARTICIPATING FEDERAL, STATE AND LOCAL AGENCIES

Figure 5.4-1 depicts the interrelationships among some of the various State and Federal organizations which may respond to an emergency at CNS.

Off-site monitoring and assessment activities will be coordinated at the EOF. The General Office support groups, as well as State, Local, and Federal Agencies will coordinate their efforts through the EOF (Figures 5.4-1 and 5.4-2). The NRC on-site effort may be coordinated through the TSC or EOF, whichever is appropriate. The affected states may send liaison representatives to the EOF to aid in the coordination effort.

5.4.1 THE STATE OF NEBRASKA

In the State of Nebraska, the Nebraska Emergency Management Agency, under the Nebraska Adjutant General, is the lead planning agency for developing radiological emergency plans for fixed nuclear facilities. On receipt of information indicating the need for State and Local Government response, a disaster emergency condition will be declared by the Governor and the State Emergency Operations Center will be activated. State agencies having responsibilities under the Nebraska State Radiological Emergency Response Plan for nuclear power plant incidents will be notified and kept informed of the progress of the emergency as discussed in that Plan.

A Governor's Authorized Representative (GAR) will be designated by the Governor. The GAR will coordinate activities of state agencies responding to the emergency. The GAR will also be a point of contact for decisions involving implementation of protective actions as recommended by the Emergency Director.

The Nebraska State Emergency Operations Center will be the principal point of contact with the Emergency Operations Centers of adjacent states. As conditions warrant, the state EOC command and control functions may be carried out from other designated facilities.

A Nebraska Health & Human Services Regulation and Licensure (HHSRL) representative will be at the Field Command Post or the EOF. Acting in coordination with NPPD Management and other agencies, he/she is responsible to perform initial state assessment of the health hazard to include development of recommendations for initiation of protective actions. This individual or representative will also coordinate the activities of the state Radiological Field Monitoring Teams and advise the Governor's Authorized Representative and local governments as to health hazards of the incident. Radiological monitoring will be conducted by both CNS Field Monitoring Teams and the HHSRL Radiological Field Monitoring Teams.

The lead agencies for the countywide emergency planning in Nemaha, Richardson, and Otoe Counties are the respective County Emergency Management Agencies/Directors. The responsibilities of various county groups are described in the appropriate annexes of the individual County Radiological Emergency Response Plans.

5.4.2 THE STATE OF MISSOURI

The principal state agency for the coordination of emergency response in the State of Missouri is the Missouri State Emergency Management Agency (SEMA). SEMA coordinates actions, operations, and resources involving response required to support decisions affecting the emergency. The Missouri Department of Health and Senior Services, through the Bureau of Environmental Epidemiology, is responsible for all decisions affecting protective responses, dose, dose commitment during the emergency, and recovery in the emergency area.

In the event of an emergency, communications between CNS and the Division of Health is maintained in order to confirm measurements and estimates of possible off-site consequences and to keep the State EOC informed of the status of the emergency.

Emergency response and support operations will be initiated through decisions made jointly by the Director, SEMA, and the Director, Division of Health or their duly appointed representatives, or on request of affected governmental officials. In the event of an emergency, which may present an off-site hazard to the public, the State Emergency Operations Center at Jefferson City will be activated in accordance with the State Emergency Operations Plan.

A representative of the state may be dispatched to the EOF. He will have direct communications with the Forward Command Post to provide accurate and timely information to State and Local Response Forces. Atchison County authorities are notified through the Atchison County 911 Center. The 911 Center is notified by NPPD or by SEMA. The response from these authorities is more fully detailed in the Atchison County Nuclear Emergency Response Plan.

5.4.3 THE STATES OF KANSAS/IOWA

The States of Kansas and Iowa may also play an active role in responding to an emergency at CNS. While neither state is within the 10 mile EPZ, they are located within the 50 mile Ingestion Exposure Pathway. As such, NPPD will maintain liaison with the appropriate officials of these states and provide information and recommendations as the situation dictates.

More detailed information can be found in the Emergency Response Plan of each respective state.

5.4.4 NUCLEAR REGULATORY COMMISSION

The NRC regulates nuclear activities to protect the health and safety of the public and to preserve environmental quality and has developed an Incident Response Plan to ensure that its statutory responsibilities are fulfilled.

The responsibilities assigned by the NRC plan are exercised through a set of implementing procedures that delineate the manner in which each function will be performed, the criteria to be used in making each decision, and the information needed for both.

When NPPD notifies the NRC of an emergency, the initial NRC response is to ascertain the status of the station and monitor emergency response activities to assure that the public and the environment are fully protected. The NRC will measure off-site radiological effects and develop projections of on-site and off-site effects for the use of other federal, state, and local agencies. The NRC may offer specific advice to NPPD to help solve or limit the consequences of the problem. The NRC is prepared to amend or change CNS Technical Specifications or to issue formal orders if NPPD should fail to take whatever actions the NRC deems necessary to protect the public.

The Chairman of the Commission is the senior NRC authority for all aspects of emergency response and will become the "Director" of all NRC activities and personnel.

Normally, the Chairman will delegate responsibilities to a "Deputy Director" upon activation of the Operations Center. The Deputy Director will carry out the delegated responsibilities unless the Chairman specifically directs otherwise. Together, the Director and Deputy Director assure that preplanned actions commence and identify other necessary actions unique to the particular incident. Headquarters and region teams will carry out these actions.

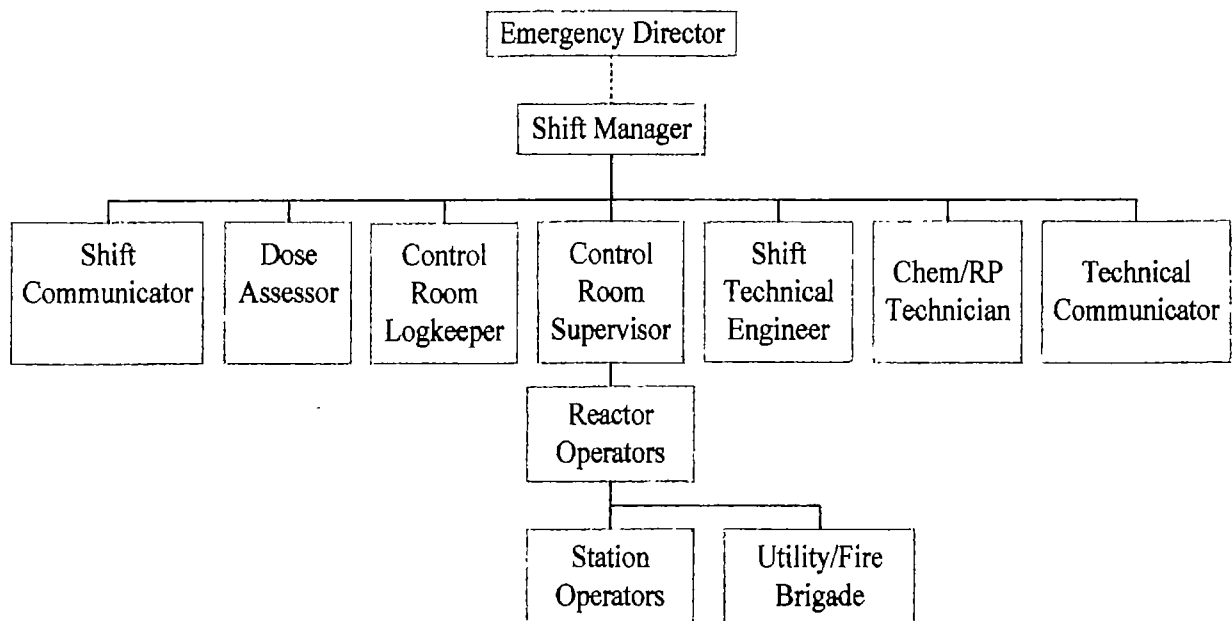
The Director may appoint an NRC "Director of Site Operations" as soon as a qualified official arrives at the site, assesses the situation, and reports back to the Director. The Director may also delegate one or more of the following authorities to the Director of Site Operations:

- Authority to recommend actions to the licensee.
- Authority to direct the licensee to take specific actions.
- Authority to recommend actions off site, including protective measures for the public.

Other officials and organizations will be immediately informed of the appointment and delegated authority. The Director of Site Operations will assume supervision of all NRC personnel at the site, will represent the NRC in interactions with other agencies, and will decide what response actions must be taken, consistent with the delegated authority.

Figure 5.2-1
CNS Normal Operating Organization - Control Room

POSITION:	Number
Shift Manager	(1)
Control Room Supervisor	(1)
Reactor Operator	(3)
Station Operator	(3)
Chem/RP Technician	(1)
Shift Communicator	(1)
Dose Assessor	(1)
Utility/Fire Brigade	(2)
Shift Technical Engineer	(1)+
Control Room Logkeeper	(1)*
Technical Communicator	(1)*



+ The Shift Technical Engineer is not required to be on-shift during cold shutdown conditions.

* These personnel are not on-shift.

Note – Figure 5.2-1 is based on the staffing analysis required by 10CFR50 Appendix E, IV.A.9, by December 24, 2012. NRC NSIR/DPR-ISG-01, "Interim Staff Guidance" and NEI 10-05, "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities", was used to conduct and document this analysis. Figure 5.2-1 new staffing numbers become effective on January 19, 2013.

Figure 5.2-2

CNS Emergency Response Organization - Technical Support Center (TSC)

POSITION:

TSC Director¹

Operations Coordinator¹

Chemistry/Radiological Protection Coordinator¹

Maintenance Coordinator¹

Engineering Coordinator¹

Operations/EOP Advisor²

Security Coordinator²

Engineering Team Leader²

Control Parameter Assessment Engineer²

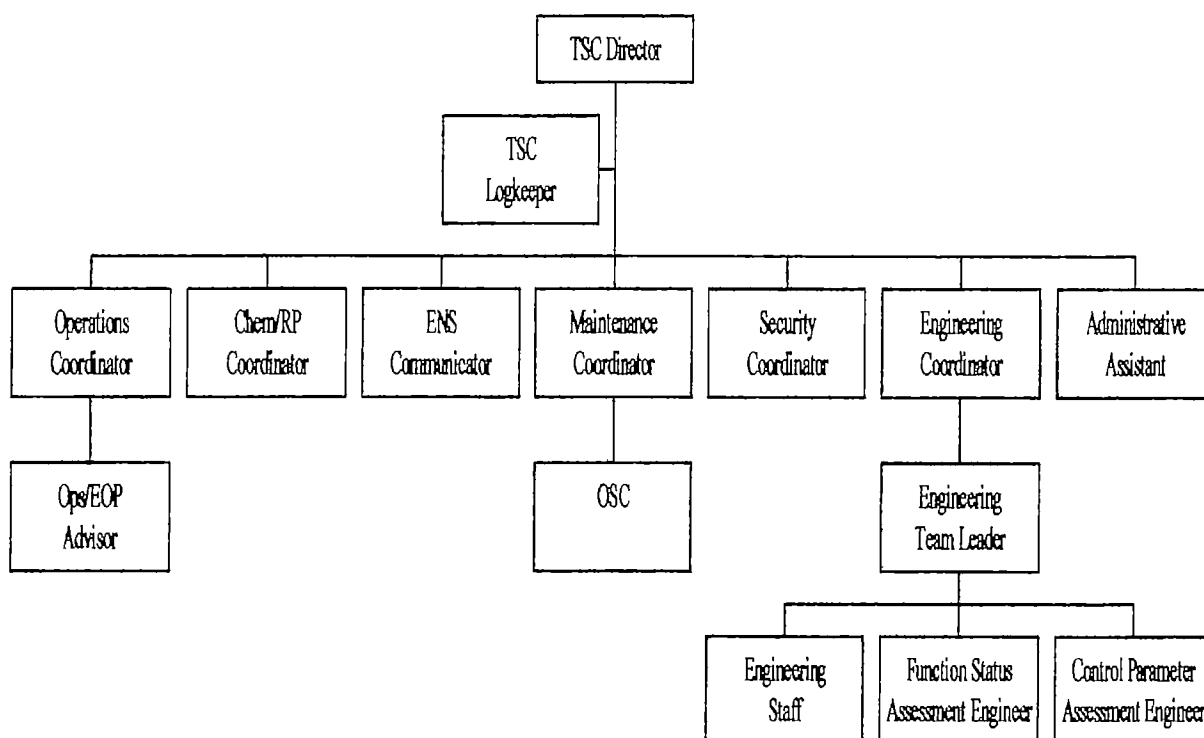
Function Status Assessment Engineer²

Engineering Staff³

ENS Communicator²

Administrative Assistant

TSC Logkeeper



¹ Minimum Staff

² Key Functional Staff

³ Engineering disciplines will be Reactor, Civil, Mechanical, and Electrical

Figure 5.2-3

CNS Emergency Response Organization - Emergency Operations Facility (EOF)

POSITION:

Emergency Director¹

EOF Director¹

Radiological Control Manager¹

Radiological Assessment Supervisor¹

Off-Site Communicator¹

Operations/EOP Advisor²

Emergency Preparedness Coordinator²

Dose Assessment Coordinator

Field Team Coordinator

Dose Assessment Clerk

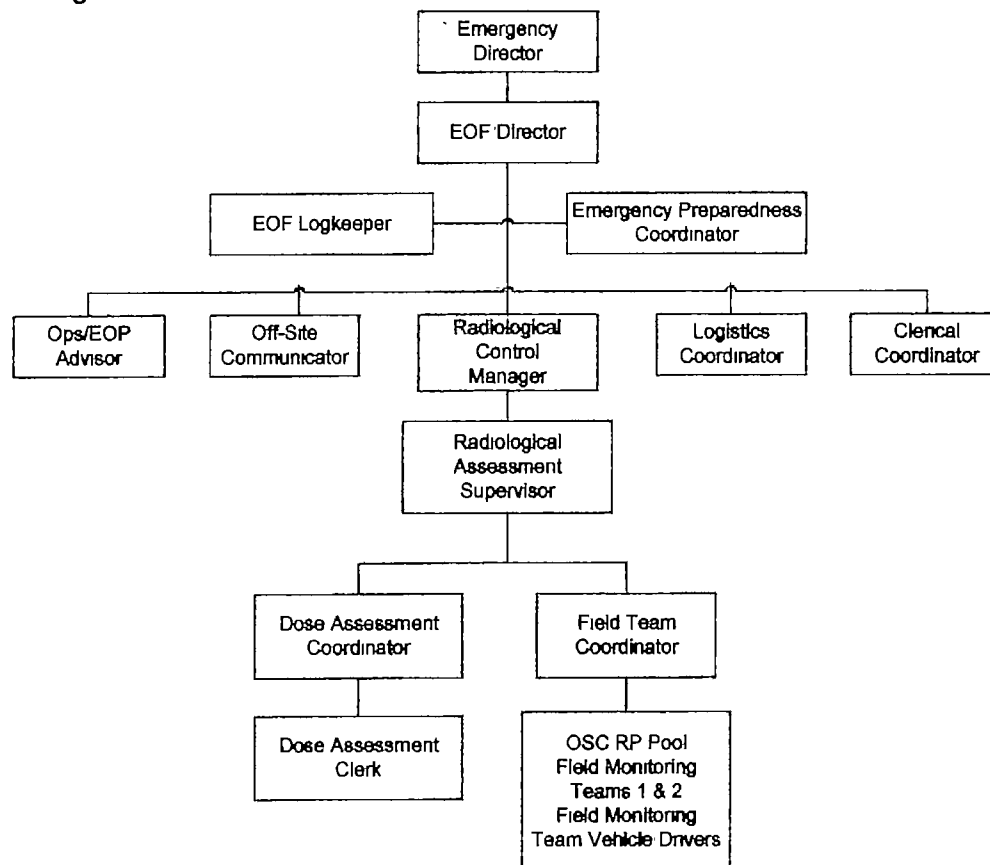
Logistics Coordinator

EOF RP Pool

EOF Logkeeper

Clerical Coordinator

Field Monitoring Team Vehicle Driver



¹ Minimum Staff

² Key Functional Staff

Figure 5.2-4

CNS Emergency Response Organization - Operations Support Center (OSC)

POSITIONS:

OSC Supervisor²

Technical Communicator

Chem/RP Lead²

RP Technicians¹ (6 minimum)

Electrical Lead

Electricians¹ (2 minimum)

Mechanical Lead

Mechanics¹ (2 minimum)

I&C Lead

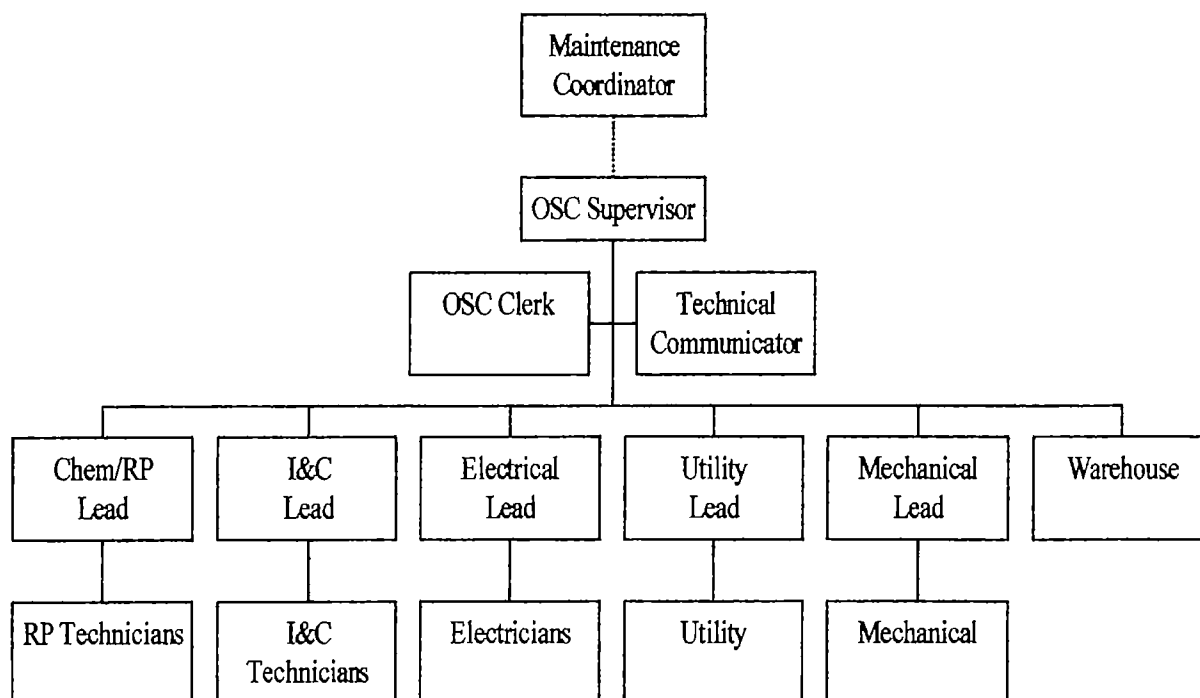
I&C Technicians¹ (2 minimum)

Utility Lead

Utility personnel

OSC Clerk

Warehouse person



¹ Minimum Staff

² Key Functional Staff

Figure 5.3-1

CNS Emergency Response Organization - Joint Information Center (JIC)

POSITION:

JIC Director¹

Technical Briefer¹

Public Information Officer¹

Facility Manager²

Designated Spokesperson²

Rumor Control Coordinator²

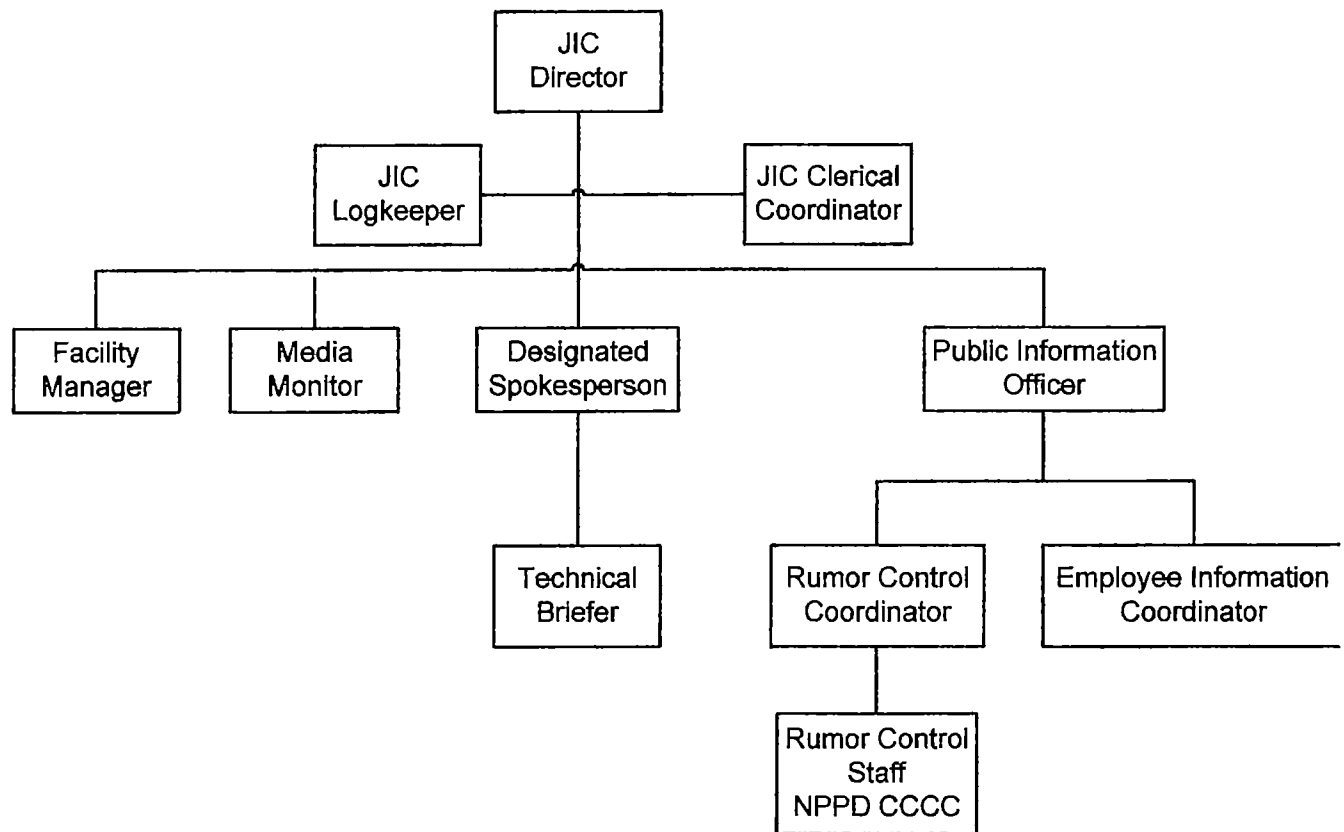
Employee Information Coordinator²

JIC Logkeeper

JIC Clerical Coordinator

Media Monitor

Rumor Control Staff (NPPD CCCC)

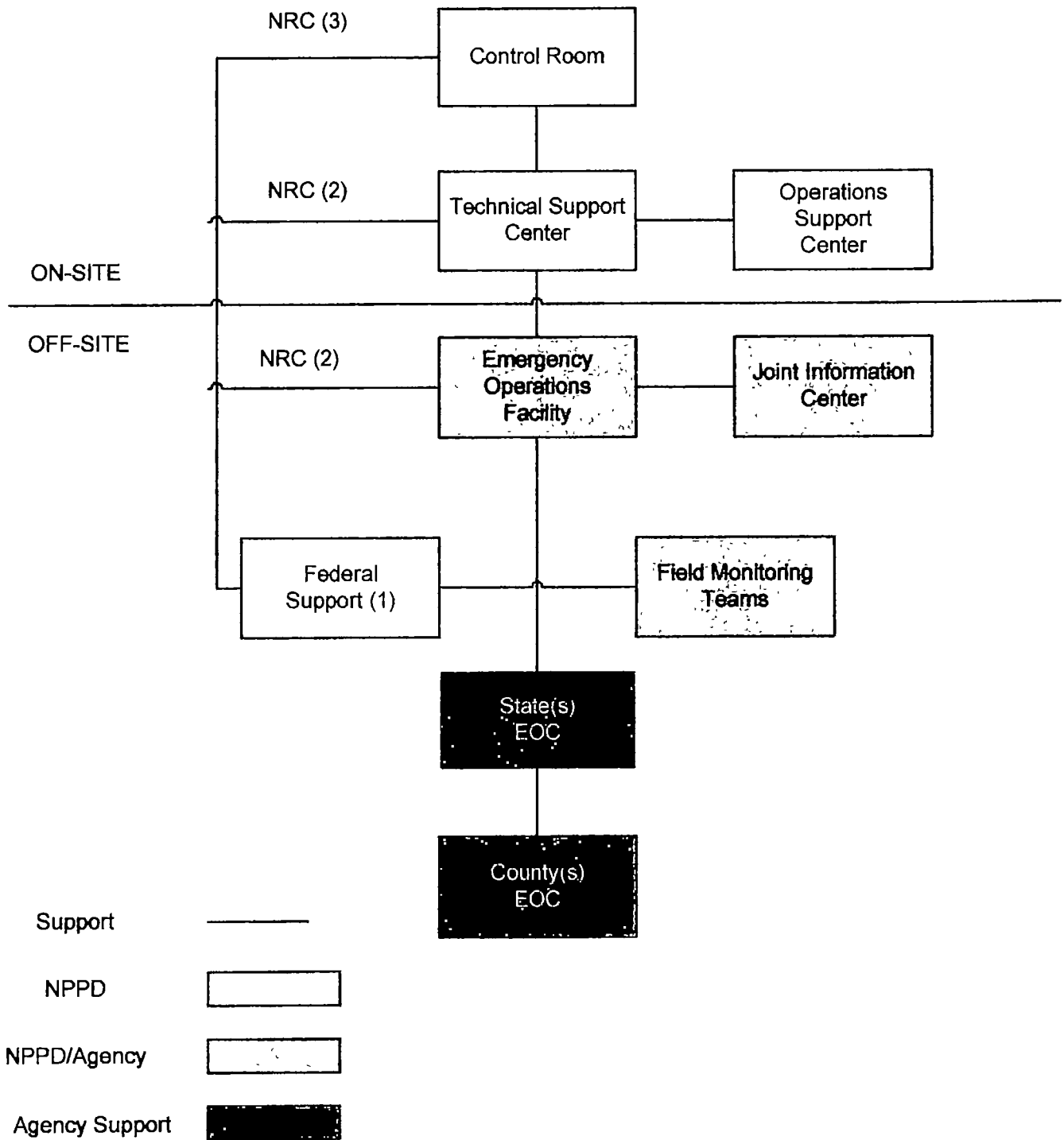


¹ Minimum Staff

² Key Functional Staff

Figure 5.4-1

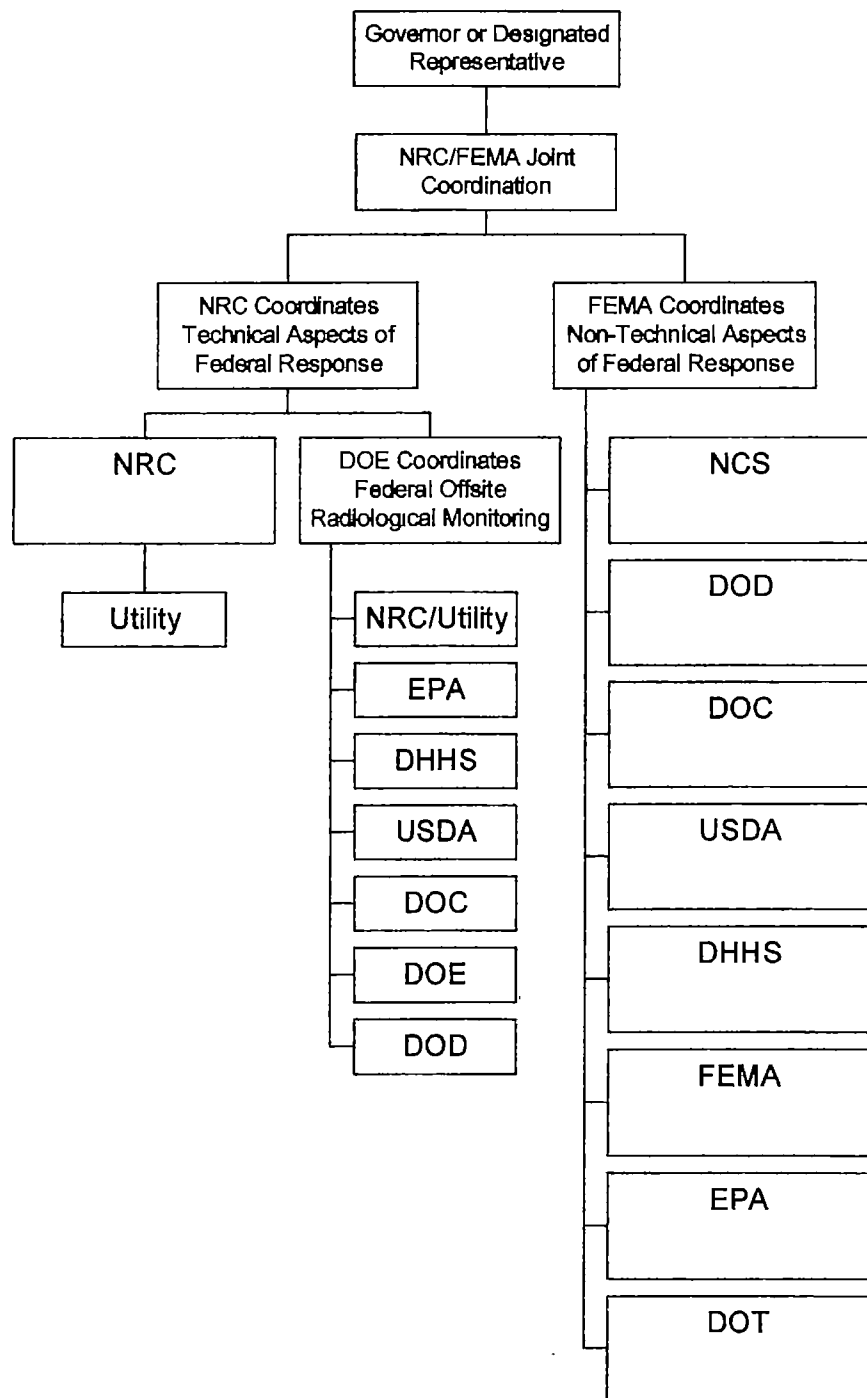
Interrelationships of Emergency Response Organizations



Notes:

- (1) See Figure 5.4-2 for detailed information on Federal Support.
- (2) NRC Support in TSC and EOF.
- (3) NRC Resident Inspector located in the Control Room.

Figure 5.4-2
Federal Response Management Diagram
Cooper Nuclear Station



Source: Federal
Register 45FR84911

6. EMERGENCY MEASURES

Nebraska Public Power District (NPPD) emergency measures will be conducted in accordance with the particular emergency classification at Cooper Nuclear Station (CNS). This section of the plan (1) discusses emergency alarms and evacuation, (2) identifies segments of the station emergency organization that will be activated at each class of emergency, (3) details methods and procedures for assessment actions, (4) specifies actions to correct or minimize the emergency situation, (5) describes protective actions to prevent or minimize radiological exposure, and (6) discusses aid to affected personnel.

6.1 SITE EMERGENCY ALARMS

When an emergency condition exists that could affect the safety of station personnel, the appropriate alarm will be manually activated and an announcement made from Control Room. If the condition involves a fire, the fire alarm will be activated and designated personnel will respond. If the condition results in an emergency declaration, the emergency alarm will be activated and an announcement made.

The condition of the emergency will dictate what directions will be given during the announcement. Site Security personnel may assist in notification of personnel on NPPD property.

6.2 NOTIFICATION AND ACTIVATION OF EMERGENCY RESPONSE ORGANIZATIONS

The four classes of emergencies defined in Section 4 require a varying degree and scope of emergency response. The appropriate parts of the emergency response organization activated in each emergency classification are presented in Section 5.

The transition from the normal operating organization to the emergency response organization involves the following steps:

- Notify the emergency response organization members who are off-site, or are on-site but may not be aware of the emergency, that their assistance is required.
- Fill emergency response positions on an interim basis with personnel who are immediately available at the time of the emergency.
- Fill positions in the emergency organization with ERO members as they arrive at the various Emergency Response Facilities.

6.2.1 ON-SITE PLANT PERSONNEL

Plant personnel on-site are notified by an emergency alarm and announcement as described in Section 6.1 and EPIP 5.7.2.

6.2.2 OFF-SITE PLANT PERSONNEL

Plant personnel (ERO) off-site are notified in accordance with EPIP 5.7.2. This is normally accomplished via the CNS Automated Notification System. A listing of telephone numbers for notification of ERO members is maintained by the Emergency Preparedness Department.

6.2.3 JOINT INFORMATION CENTER (JIC)

EIPs 5.7.2, Emergency Director EPIP, and 5.7.6, Notification, define how General Office personnel are notified. Depending upon the situation, the JIC may be activated. Personnel notification schemes and procedures for activating this facility are contained in EPIP 5.7.23.

6.2.4 OFF-SITE AUTHORITIES AND SUPPORT AGENCIES

When an emergency classification is declared, CNS will initiate pre-determined notifications as defined in EPIP 5.7.6. Initial notifications to responsible State and Local Governmental Agencies will be completed within 15 minutes of the declaration of an emergency. The contents of initial and follow-up notifications are set forth in EPIP 5.7.6, and contain information about the class of emergency, release information, potentially affected population areas, and protective action recommendations. Follow-up communications with off-site authorities will consist of periodic messages containing additional information as described in EPIP 5.7.6.

Notifications to responsible State and Local Governmental Authorities are normally accomplished via the CNS State Notification Telephone System.

Off-site authorities, as well as technical support groups likely to be consulted in an emergency, are listed in the Emergency Telephone Directory.

6.2.5 NUCLEAR REGULATORY COMMISSION (NRC)

Notification of the NRC Operations Center for all emergency classification levels is normally accomplished via the Federal Telecommunication System Emergency Notification System (FTS-ENS) in accordance with EIPs 5.7.6 and 5.7.ENS.

6.3 ASSESSMENT ACTIONS

The assessment of station conditions, radiation levels, and off-site consequences is initially conducted by the Control Room. Radiological dose assessment can also be performed in the Control Room, as necessary. The Shift Manager, in the role of Emergency Director, activates the emergency response organization described in Section 5 per EPIP 5.7.2. Assessment actions described in Table 6.3-1 will continue throughout the emergency. These assessments may result in reclassification, which could alter emergency response actions.

CNS has systems for monitoring radioactive materials released to the environment, and is equipped with process and system monitors capable of assessing radiological conditions and initiating appropriate alarms or actuating control equipment for containment of radioactive materials if pre-established limits are reached. These systems will monitor radioactive releases during accident conditions.

6.3.1 POST-ACCIDENT SAMPLING SYSTEM

Samples of both reactor water coolant and drywell atmosphere can be drawn using Post-Accident Sampling System. This system allows personnel to safely take samples and conduct analyses, while keeping radiation dose to personnel within specified limits. Samples collected and analyzed will provide information, which may indicate reactor conditions such as cladding failure, effects from high fuel temperature, or fuel melting.

6.3.2 METEOROLOGICAL DATA

The site has meteorological instrumentation, which indicates and records wind speed, wind direction, and temperature differentials on a continuous basis. Detailed information on this system can be found in Section 7.5.2. A continuous readout of this information is available on the Plant Management Information System (PMIS). In the event that meteorological information from this primary source is unavailable, meteorological information is available from the National Weather Service.

6.3.3 DOSE ASSESSMENT

CNS has the capability of performing dose projections during a radiological emergency using two separate techniques:

- **CNS-DOSE:** CNS-DOSE, a computerized class 'A' model, is the primary method of performing rapid dose projections (predictions) in order to develop protective action recommendations during the early accident phase within the plume exposure EPZ. The program is operated on plant computers and can make use of current meteorological and radiological effluent monitor readings as well as manually entered data.

- **HAND CALCULATION:** A manual calculation, derived from the methodology utilized by CNS-DOSE, is the backup method for performing dose projections in order to develop protective action recommendations during the early accident phase within the plume exposure EPZ. Input data is taken from the same resources as the computerized method. Both centerline and off-centerline calculations can be performed.

Once the EOF is operational, dose projection and assessment responsibilities are transferred from the Control Room to this facility. The TSC also has the capability to perform dose assessments.

Off-site concentrations of radionuclides and radiation dose rates are determined by NPPD and State Field Monitoring Teams. Once the EOF is operational, Field Monitoring Teams are deployed with portable radiological instrumentation (air samplers and radiation survey meters) and communications equipment in vehicles designated for this purpose. The field instrumentation used for airborne activity monitoring has the capability to detect radioiodine concentrations as low as 1.0×10^{-7} $\mu\text{Ci/cc}$ (microcuries per cubic centimeter). Field information is used to validate dose projections and to assist in determining the adequacy of protective actions.

6.4 CORRECTIVE ACTIONS

Instrumentation and Control Systems monitor, provide indications and alarms, record, and automatically control systems necessary for the safe operation of the station. Control and display of information from these systems is centralized in the Control Room. Displays are also available in the TSC and EOF. This instrumentation is a source of information used to determine emergency classification as shown in Tables 4.1-1 through 4.1-4, and EPIP 5.7.1 (Emergency Classification), and may provide entry conditions for Abnormal Operating Procedures (AOPs), Emergency Operating Procedures (EOPs) or Severe Accident Guidelines (SAGs). AOPs, EOPs, and SAGs contain steps for preventive and/or corrective actions to avoid or mitigate consequences of an emergency.

During a declared emergency, corrective actions are performed by the ERO under the direction of the Emergency Director. These corrective actions are designed to (1) terminate the accident, (2) mitigate or eliminate potential hazards to the public and station personnel, (3) restore the plant to a safe and stable condition, and (4) de-escalate the emergency classification. The potential nature of some emergencies may warrant the utilization of off-site individuals, organizations, and agencies. As a result, local support service arrangements have been made with off-site groups to provide on-site aid in the event of an emergency situation, including those resulting from hostile actions. Corrective actions may also involve response by the following:

- **FIRE BRIGADE**

The CNS Fire Brigade will respond to station fire calls. The Fire Brigade is composed of the Fire Brigade Leader, two Station Operators, and two other individuals qualified as Fire Brigade members, in accordance with station procedures. If off-site firefighting assistance is required, including that caused by hostile action, fire response including fire apparatus and firefighters will normally be requested by the CNS Control Room to the Nemaha County 911 Dispatch Center and implemented using the National Incident Management System (NIMS). Mutual aid may also be requested via the Nebraska Emergency Management Agency. Off-Site Fire Department(s) will be escorted to the fire scene by Security personnel upon arrival.

- **REPAIR AND DAMAGE CONTROL TEAM**

For minor emergencies, station personnel will handle cleanup, repair, and damage control. For more severe emergencies, the support of additional NPPD personnel or specialized outside contractors may be required to assist in damage control, cleanup, and repair operations.

6.5 PROTECTIVE ACTIONS

On-site actions to protect station personnel and visitors during a declared emergency are the responsibility of the Emergency Director. Measures for the protection of the general public are detailed in the State Emergency Response Plans.

Protective actions for on-site personnel will be taken whenever a radiological emergency has occurred, or may occur, which might result in concentrations of airborne activity or radiation levels in excess of pre-determined limits. Protective actions will also be taken for on-site personnel in other emergency situations such as fires, floods, tornadoes, or security related events where personnel safety is threatened. A range of protective actions to protect on-site personnel during hostile action is provided to ensure the continued ability to safely shut down the reactor and perform the functions of the emergency plan. An alternative facility, with communication capabilities for contacting the Control Room, plant security, and the EOF is available to serve as a staging area for Augmented Emergency Response Staff if the site is not accessible or the site is under threat of or experiencing hostile action. Activation of Emergency Response Facilities, assembly and accountability activities, and evacuation of site personnel may be delayed if it is determined by the Emergency Director that personnel safety would be threatened. In this situation, on-site personnel will be notified of these events by the station alarms, telephone calls, or public address system announcements, as applicable. Personnel will be notified of appropriate protective actions to be taken as soon as assessment actions permit a proper evaluation of conditions.

Following the instructions and using the procedures referenced in EPIP 5.7.20, the Radiological Control Manager will determine if the projected downwind doses indicate a need to implement any type of protective actions. If the results of the analysis indicate a need to implement protective actions, he will inform the Emergency Director of his findings and together they will decide if protective action recommendations are warranted.

The Emergency Director will provide protective action recommendations to off-site authorities. Protective actions for off-site areas are implemented by State and Local Government Emergency Response Organizations. These actions may include evacuation or in-house shelter. Factors such as release duration, mobilization time, or adverse weather will be important considerations affecting protective actions. The action which affords the lower radiation dose is preferred. Approximate initiation times for protective actions are shown in Table 6.4-2.

Within the Plume Exposure Pathway, an Alert and Notification System (ANS) has been installed. Residents of this EPZ have been instructed to tune to their local Emergency Alert System radio station for further instructions when the ANS is activated. This system was established to meet the prompt notification requirements established by the NRC and was designed for response to any disaster where prompt notification of the public is desirable. The design basis and rationales for the ANS is in the ANS Design Report. Details pertaining to physical and administrative controls of this system are also found in this document.

The ANS includes fixed sirens and digitally-activated National Oceanic and Atmospheric Administration/Emergency Alert System (NOAA/EAS) Radio Receivers. These radio receivers are made available to residences located within the Plume Exposure Pathway, but outside the hearing range of the fixed sirens. The radios are pre-tuned to an EAS station and are automatically activated when the EAS is activated. Special use or remote area notification is discussed in the CNS ANS Design Report. State and Local Plans have provisions for notifying the transient population within the Plume Exposure Pathway.

EPIP 5.7.27 describes how the system will be activated in the event of an emergency. Local and/or state governments are responsible for implementation of notification/warning actions. Normally, public warning information will be disseminated as directed by the Governor or his Authorized Representative. However, the Notification System provides for local government decision and initiation of notification/warning actions, especially in the event of a major nuclear power plant incident. Local governments may make decisions based on the recommendations of NPPD Management or state representatives.

As indicated in EPIP 5.7.27, pre-arranged messages are used when instructing the general public on what actions should be taken. Approximately 15 minutes will be required to notify the public from the time the decision has been made to activate the system to the time required to broadcast a message.

EPIP 5.7.27.1 describes how a malfunctioning NOAA/EAS radio will be repaired or replaced.

Back-up ANS methods have been established and are implemented by the Local Emergency Management Agencies. The back-up ANS for Atchison County, Missouri is Route Alerting. Route Alerting maps can be found in Atchison County Transportation and Fire Department procedures. Atchison County also uses social media to provide emergency alerts to the public, as a back-up method. Instructions for Route Alerting and the use of social media can be found in the Atchison County procedures. The 10-mile EPZ population in Missouri is approximately 2,215 people based on the current Cooper Nuclear Station Evacuation Time Estimate. Based on the guidance contained in the above procedures, there is reasonable assurance that back-up ANS can be completed within the target time of 45 minutes. The back-up ANS for Nemaha and Richardson Counties in Nebraska is the cloud-based mass notification service "Southeast Nebraska Emergency Notification System (SEN ENS)". This system can send emergency messages to geo-coded (by address) telephones throughout the EPZ. Otoe County Emergency Management Agency is the sponsor of this system. The primary activation points for this system are located at the Nemaha County Emergency Management office, the Richardson County Emergency Management office, and the Otoe County Emergency Management office. Multiple activation points offer the advantage of back-up activation capability should one activation point lose activation capability. The 10-mile EPZ population in Nebraska is approximately 1,800 people based on the current Cooper Nuclear Station Evacuation Time Estimate. Thus, including the potential addition of households that have land-lines and cellular communication voice or SMS text devices, plus business and institutional addresses correspond to a maximum expected number of contacts to be made, there is reasonable assurance that back-up ANS can be completed on an area-wide bases within the target time of 45 minutes.

6.5.1 RESCUE OPERATIONS

The search and rescue function is handled by trained emergency response personnel. If station personnel are unaccounted for in the initial or subsequent personnel accountability, an emergency team will be assigned to locate and, if necessary, rescue them, observing the guidelines set forth in EPIP 5.7.15.

6.5.2 ON-SITE PROTECTIVE EQUIPMENT AND SUPPLIES

Protective equipment is available on-site to minimize radiological dose and contamination, as well as firefighting hazards. The types of equipment include full-face particulate respirators, self-contained breathing apparatus, protective clothing, and air-fed respirators.

This equipment is located in the normal station storage areas, and in or near the Control Room and the Emergency Response Facilities. An inventory of this equipment is contained in EPIP 5.7.21.

6.5.3 PERSONNEL ASSEMBLY AND ACCOUNTABILITY

When the emergency alarm is sounded, site visitors, contractors, and non-ERO on-site personnel will proceed to their Designated Assembly Area. Emergency response personnel will report to their Emergency Response Facility or designated assembly area. The results of personnel accountability will be compiled and reported to the Emergency Director. In the event an individual cannot be located, search teams will be dispatched. Initial accountability will be completed within 30 minutes and continuous accountability will be maintained throughout the course of the emergency per EPIP 5.7.10.

6.5.4 DISMISSAL AND EVACUATION

When the emergency alarm is sounded, all personnel will proceed to their designated assembly area by the most direct route unless otherwise instructed to avoid specified areas. The classification and magnitude of the emergency will dictate which Emergency Response Facilities shall be activated, the areas of the site to be avoided, and the off-site support required.

Upon assembly and accountability of all personnel, it may be appropriate to dismiss specific personnel to go home, or necessary, to direct personnel to the alternate assembly point located in the Nemaha County Maintenance Facility.

All SITE AREA and GENERAL EMERGENCIES require evacuation of all non-ERO personnel. EPIP 5.7.11 provides the specific procedures to be followed in the event site dismissal or evacuation is required. Once the decision has been made to evacuate, non-ERO employees, contractors, and visitors can be evacuated and relocated to a remote assembly area within approximately one hour.

Personnel will not return to the station or deactivate Emergency Response Facilities until directed by the Emergency Director or until the "ALL CLEAR" signal is sounded by the Control Room.

6.5.5 CONTAMINATION AND DOSE CONTROL MEASURES

6.5.5.1 ON-SITE

Measures will be taken to prevent ingestion of radioactive materials deposited within the Site Boundary. Affected areas will be isolated. Details of contamination control measures for on-site areas are contained in Station Operation procedures.

The monitoring of the work environment within radiological control areas, including specific instructions, precautions, and limitations to personnel working within these areas is supervised by Radiological Protection personnel.

Food for emergency response personnel will be provided from off-site sources or from on-site supplies stored in a contamination resistant location.

Exposure to airborne radioactivity will be controlled in accordance with appropriate ALARA principles. Periodic air samples will be taken to assure that radioiodine and airborne contamination levels are known.

Radioprotective tablets (Potassium Iodide) are available for voluntary use by NPPD personnel. NPPD may also provide radioprotective tablets to non-NPPD emergency response organizations for distribution to their emergency workers (i.e., the requesting organization has inadequate supplies). Administration of these tablets to non-NPPD personnel will be the responsibility of these non-NPPD organizations. Any NPPD distribution of radioprotective tablets will be made at the direction of the Emergency Director.

EPIP 5.7.14 provides further information on the use and distribution of radioprotective (Potassium Iodide) tablets.

During an emergency, equipment and tools will be unconditionally released for use outside the area only if their radiation levels are less than 1 mrem/hr above background (fixed contamination) and 220 dpm/100cm² alpha activity or 2200 dpm/100cm² beta-gamma activity above background (removable contamination).

6.5.5.2 OFF-SITE

For areas beyond the site boundary, Nebraska and Missouri Radiological Monitoring Teams, in coordination with CNS Monitoring Teams, will identify contamination and radiation levels. For areas where public access normally occurs, criteria for off-site areas will be applied. Criteria and measures for contamination control in off-site areas are detailed in the Nebraska and Missouri Emergency Plans.

6.5.6 SECURITY AND ACCESS CONTROL

The CNS Security Plan is approved by the NRC and restricts access to the site. Security personnel control access to the Protected Area and during declared emergencies, control access to areas of the Owner Controlled Area.

A roadblock will be established on the Plant Access road. Personnel attempting to access the site will be informed of the situation and, if cleared, will be directed to the proper location.

For Security related emergencies, Local Law Enforcement Agency assistance may be requested.

6.6 AID TO AFFECTED PERSONNEL

6.6.1 EMERGENCY PERSONNEL DOSE CRITERIA

Dose records for station personnel are maintained by the Radiological Protection Group and are accessible at the TSC. This information will be utilized in determining emergency team assignments. Criteria used for limiting

dose to emergency workers are based on recommendations of the U.S. EPA and are shown in Table 6.4-1.

Emergency workers will wear dosimetry as required by Radiological Protection personnel. Emergency worker dosimetry will be provided on a 24-hour basis by Radiological Protection personnel. Every effort will be made to minimize emergency worker dose through the use of protective equipment and supplies, and by minimizing exposure time. The Chemistry/Radiological Protection Coordinator and the Maintenance Coordinator, with assistance of the OSC Supervisor, are responsible for making emergency team assignments. Only the Emergency Director may authorize emergency workers to receive dose in excess of 10CFR20 occupational limits. Personnel conducting corrective or protective actions or life-saving actions who may receive dose in excess of occupational limits should be selected from those who volunteer. Radiological Protection personnel are also responsible for providing self-reading and permanent dosimetry devices to emergency personnel assembled at the OSC and for assuring accountability of each worker's dose. Emergency radiation exposure is controlled in accordance with EPIP 5.7.12.

6.6.2 DECONTAMINATION AND FIRST AID

Provisions have been made to assist personnel who are injured, contaminated, or who may have received high radiation doses. Station personnel are trained in first aid and portable first aid kits are available at strategic locations throughout the station. In addition, first aid lockers and decontamination facilities are provided within the station. In the event the above are not available during an emergency, the CNS Communications Building will be used as a first aid station and personnel decontamination center. Detailed information on personnel monitoring and decontamination, including radiological criteria is contained in Station Radiological Protection Procedures. Personnel found to be contaminated will undergo decontamination under the direction of Radiological Protection personnel.

6.6.3 MEDICAL TRANSPORTATION

A station ambulance is available for the transportation of injured personnel when station EMT's are available. This vehicle is reserved for emergency use to assure ready availability in time of need. During times when the station ambulance is unavailable due to the performance of preventative maintenance, malfunction, or other circumstances, backup medical transportation services shall be contacted and services requested when necessary.

The CNS ambulance is equipped with all required equipment and supplies required by the State of Nebraska for a licensed ambulance. The ambulance also has communications equipment for communicating with the Plant and Nemaha County Hospital. Ambulance attendants (Nebraska-certified EMTs or Paramedics) are trained to handle contamination cases. In addition, NPPD Radiological Protection personnel will accompany contaminated patients to the hospital. If off-site emergency medical response is required, including that caused by hostile action, emergency medical services including ambulances,

and emergency medical technicians as requested by the CNS Control Room or TSC to the Nemaha County 911 Dispatch Center and implemented using the National Incident Management System (NIMS) has been arranged. Mutual aid may also be requested via the Nebraska Emergency Management Agency. Off-site medical transport services will be escorted to the scene by Security personnel upon arrival.

6.6.4 MEDICAL TREATMENT FACILITIES

The Shift Manager or his designee in accordance with EPIP 5.7.24 will notify the appropriate hospitals if injured personnel are to be transported from the site.

Arrangements have been made with the hospitals listed below for care of injured personnel, including cases involving radiological contamination and radiation over-exposure. Selection of the hospital and medical assistance will be based on:

- Obtaining the most rapid access to the necessary medical services and facilities.
- Capabilities of the specific hospital to provide the required services.
- Accessibility due to weather and road conditions.
- Number of injured personnel to be transported.
- Preference of the injured personnel, if the type and severity of the injury permit.

Except as otherwise dictated by the above conditions, hospitals and medical assistance will be utilized in the following order of priority, based on proximity to Cooper Nuclear Station:

- Nemaha County Hospital, 2022 13th Street, Auburn, Nebraska.
- University Nebraska Medical Center, Center for Clinical Excellence, East Side, 44th and Dewey, Omaha, Nebraska.

In accordance with Nebraska Statutes (85-805, 806, 807), Nebraska Public Power District supports the University of Nebraska Radiation Health Center and maintains the right to all services of the Radiation Health Center for, but not limited to:

- Specialized medical and related services for evaluation, treatment, and management of radiation casualties.
- Routine medical, radiation protection, consultation, and associated services.
- Educational programs for nuclear safety, with emphasis on preventive medicine and radiological protection.

Patients with radiological injuries beyond the scope of the local medical facilities will be transferred to the Radiation Health Center at the discretion of the local medical staff.

TABLE 6.3-1
ASSESSMENT ACTIONS

ACTION	DESCRIPTION
1. Surveillance of Emergency Assessment Instrumentation	The radiation level, pressure, temperature, flow, and meteorological data are monitored. Control Room Operators can assess plant status by observing sensor readout. Most sensors have visual and audible alarms. Data will be provided to the Emergency Director, as necessary, for his assessment. Control Room Operators will take corrective actions as necessary.
2. Personnel Accountability	Personnel Assembly and Accountability is the responsibility of the Security Coordinator and is carried out utilizing the security computer. Personnel accountability is maintained by communications with lead personnel at the various Emergency Response Facilities.
3. In-Plant Radiological Surveys	Radiological Protection Teams perform these surveys. The radiation levels on the station's fixed area and Ventilation Monitoring Systems will be used to assist in these evaluations. Contamination surveys of equipment and personnel are conducted with portable equipment from the emergency kits or routine station equipment storage areas.
4. Site Boundary Surveys	The surveys are handled by Radiological Protection Teams in same fashion as in-plant surveys.
5. Off-Site Consequence Assessment	Radiological Assessment personnel will use the computer model, effluent monitors, meteorological output, or data supplied by deployed Radiological Protection Teams. Manual Dose assessment techniques are available in the event computer programs are unavailable.
6. Environmental Monitoring	Samples of various environmental media are collected and analyzed by station Chemistry and Radiological Protection personnel. Results will be evaluated by station personnel with assistance from a contract laboratory if required. State and Federal response personnel may also analyze collected media.
7. Assessment Reporting	In the case of actual or potential off-site consequences, the State and Local Authorities are immediately notified in accordance with the appropriate CNS EPIPs. Local Authorities use pre-determined criteria to initiate various protective actions for the public, as illustrated in Table 6.4-2.

TABLE 6.4-1

EPA Protective Action Guides (PAGs) for the Early Phase of a Nuclear Incident

PROTECTIVE ACTION	PAG (PROJECTED DOSE)	COMMENTS
Evacuation (or sheltering ^a)	1-5 rem ^b	Evacuation (or, for some situations, sheltering ^a) should normally be initiated at 1 rem.
Administration of stable iodine	25 rem ^c	Requires approval of State Medical Officials.

- ^a Sheltering may be the preferred protective action when it will provide protection equal to or greater than evacuation, based on consideration of factors such as source term characteristics, and temporal or other site-specific conditions.
- ^b The sum of the effective dose equivalent resulting from exposure to external sources and the committed effective dose equivalent incurred from all significant inhalation pathways during the early phase. Committed dose equivalents to the thyroid and to the skin may be 5 to 50 times larger, respectively.
- ^c Committed dose equivalent to the thyroid from radioiodine.

NOTE – From EPA 400-R-92-001, Manual of Protective Action Guides and Protective Actions for Nuclear Accidents (Table 2-1).

GUIDANCE ON DOSE LIMITS FOR WORKERS PERFORMING EMERGENCY SERVICES

DOSE LIMIT ^a (rem)	ACTIVITY	CONDITION
5	All	N/A
10	Protecting valuable property	Lower Dose Not Practicable
25	Life Saving or Protection of Large Populations	Lower Dose Not Practicable
>25	Life Saving or Protection of Large Populations from Extensive Exposure	Only on a Voluntary Basis to Persons Fully Aware of the Risks Involved

- ^a Sum of external effective dose equivalent and committed effective dose equivalent to non-pregnant adults from exposure and intake during an emergency situation. Workers performing services during emergencies should limit dose to the lens of the eye to 3 times the listed value and doses to any other organ (including skin and body extremities) to 10 times the listed value. These limits apply to all doses from an incident, except those received in unrestricted areas as members of the public during the intermediate phase of the incident.

NOTE – From EPA 400-R-92-001, Manual of Protective Action Guides and Protective Actions for Nuclear Accidents (Table 2-2).

TABLE 6.4-2

INITIATION TIMES FOR PROTECTIVE ACTIONS FOR THE GENERAL PUBLIC

APPROXIMATE INITIATION TIME	EXPOSURE PATHWAY	ACTION TO BE INITIATED
0 - 4 Hours	Inhalation of gases or particulates	Evacuation, in-house shelter, (if evacuation is not practical), access control, respiratory protection, prophylaxis (thyroid protection).
	Direct radiation	Evacuation, in-house shelter, access control.
4 - 48 Hours	Milk	Take cows off pasture, prevent cows from drinking surface water, quarantine contaminated milk, utilize stored feeds.
	Harvested fruits and vegetables	Wash all produce or impound produce.
	Drinking water	Cut off contaminated supplies, substitute from other sources.
	Unharvested produce	Delay harvest until approved.
2 - 14 Days	Harvested produce	Substitute uncontaminated produce.
	Milk	Discard or divert to stored products, such as cheese.
	Drinking water	Filter, demineralize, test.

7. EMERGENCY RESPONSE FACILITIES AND EQUIPMENT

This section of the CNS Emergency Plan describes the Control Room and the Emergency Response Facilities, including on-site and off-site communications systems, assessment equipment and facilities, protective facilities and equipment, first aid and medical facilities, and damage control equipment and supplies.

7.1 CONTROL ROOM

Emergency assessment and control is initially directed from the Control Room by the Shift Manager prior to activation of the Technical Support Center (TSC). The Control Room is located in the Control Building and is equipped with an Emergency Bypass Ventilation System allowing habitability during Design Basis Accidents as defined in the Cooper Nuclear Station (CNS) Updated Safety Analysis Report. The Control Room contains plant instrumentation, required technical drawings, CNS records, and communications equipment.

Communication equipment available for this facility is shown on Table 7.1-1.

7.2 EMERGENCY RESPONSE FACILITIES

When activated, the following Emergency Response Facilities supplement the Control Room in assessing and controlling emergencies:

7.2.1 TECHNICAL SUPPORT CENTER

The TSC (Figure 7.2-1) is the focal point for on-site emergency coordination and for directing and assisting the Control Room during station emergency conditions. The following functions are performed in the TSC:

- Provide management and technical support to station Operations personnel during an emergency.
- Relieve Operations personnel of duties not directly related to Reactor System manipulations (e.g., NRC notifications).
- Temporarily assumes the role of the EOF in the event the EOF functions must be transferred.

The TSC is located on the first floor of the Administration Building. Figure 7.2-1 provides a layout of the TSC.

If the TSC should become uninhabitable, select TSC personnel would relocate to the Control Room. Remaining TSC personnel would report to the AOSC.

To protect personnel under most conditions, the TSC is provided with dedicated radiological protection and monitoring equipment capable of continuous indication of dose rates and airborne radioactivity concentrations. Local alarms provide early warning to TSC personnel.

The TSC Ventilation System is comparable to the Control Room Ventilation System. Although not seismically qualified, redundant, or automatically activated, it does include high efficiency particulate air filters and charcoal filters. System capacity is based on design basis accident airborne radioactivity levels, independent of thyroid blocking provisions (potassium iodide).

Emergency equipment listed in EPIP 5.7.21 and Appendix E is provided to protect personnel who must exit the TSC or continue TSC operation during the presence of low-level airborne radioactivity or radioactive surface contamination.

To facilitate the TSC function, a set of As-Built drawings of the station, schematics and diagrams, Technical Specifications, Station Operating Procedures, Emergency Operating Procedures, Severe Accident Guidelines and associated Technical Support Guidelines, station operating records, records needed to perform the functions of the EOF when it is not operational, and a copy of the Updated Safety Analysis Report are available to personnel in the TSC.

Communication equipment available for this facility is shown on Table 7.1-1.

7.2.2 OPERATIONAL SUPPORT CENTER

The OSC (Figure 7.2-2) is the assembly and staging area for CNS personnel for emergency response assignments. The OSC provides a location where plant logistic support can be coordinated during an emergency. Chemistry/Radiological Protection personnel, Mechanical Maintenance personnel, Electrical and Instrument & Control personnel, Utility personnel, and administrative personnel report to the OSC. The OSC is located adjacent to the TSC. In the event the OSC would need to be relocated due to habitability concerns, the Training Center Classrooms H, I, and J (903' Level) have been identified as an alternate OSC.

Communication equipment available for this facility is shown on Table 7.1-1.

7.2.3 EMERGENCY OPERATIONS FACILITY

The EOF (Figure 7.2-3) is located at 902 Central Avenue in Auburn, Nebraska approximately 11 miles west of the plant site. The EOF performs the following functions:

- Management of the off-site emergency response.
- Coordination of radiological and environmental assessment.
- Determination of recommended protective actions for the public.
- Coordination of emergency response activities with federal, state, and local agencies.
- Event Classification.
- Notification to off-site authorities.

The EOF has sufficient space to accommodate CNS emergency response personnel and representatives from local, state, and federal response agencies.

Field Monitoring Teams will be dispatched from the OSC and controlled from the EOF. Emergency equipment in the Communications Building, West Warehouse, and/or Field Monitoring Team vehicles consist of material and equipment needed for off-site monitoring and re-entry activities. This equipment includes procedures, protective clothing, radiation detection instrumentation, dosimetry, air sampling equipment, respiratory protection equipment, personnel decontamination supplies, and counting instruments. A list of this equipment is included in the Emergency Plan, Appendix E, as well as In Implementing Procedure (EPIP) 5.7.21. Results of off-site surveys and sample analyses will be reported to the EOF for evaluation and assessment, and to aid in the development of protective action recommendations to off-site authorities.

Personnel in the EOF and TSC have the capability to assess meteorological data, current plant conditions and release rate data from the Safety Parameter Display System (SPDS) or the Control Room to determine projected downwind doses. All of this data is prominently displayed in the EOF and is readily available to local, state, and federal authorities for use in making an independent determination of protective actions.

Communication equipment available for this facility is shown on Table 7.1-1.

Communication by facsimile equipment between the EOF, TSC, and the JIC is also provided.

Information available in the EOF includes: CNS Technical Specifications, Operating Procedures, Emergency Operating Procedures, Updated Safety Analysis Report, environs radiological monitoring records, and selected As-Built drawings. In addition, copies of State and Local Emergency Response Plans and information pertinent to evacuation is also maintained.

The Nebraska Emergency Management Agency's Mobile Operations Center (MOC) and the Nebraska State Patrol Mobile Command Post may be stationed adjacent to the EOF. These vehicles are self-sustaining with their own electrical power and communications systems.

7.2.4 JOINT INFORMATION CENTER

The JIC is the media briefing area and is the focal point for contact with the media. The JIC (Figure 7.2-4) is located adjacent to the EOF at 902 Central Avenue in Auburn, NE. The JIC is jointly staffed by utility, State, and Federal personnel. The JIC carries out the following functions:

- Coordinate the dissemination of information to the news media.
- Conduct media monitoring.
- Maintain rumor control.
- Provide NPPD employees with information concerning the emergency.

To assure accurate and timely information is available to the public, personnel manning the JIC have current information on plant status available. A direct continuous line for communication is available between the JIC and the other ERFs. NPPD personnel are available to respond to any questions regarding plant status, radiological releases, protective actions, etc.

The JIC contains up-to-date copies of station, state, and county emergency plans, maps of the CNS site area and its environs, regional maps, and station layout drawings. Other equipment, facilities, and services that will be located within, or near the JIC include communication links with the EOF and state Emergency Operations Centers, reproduction equipment, and word processing capability.

Communication equipment available for this facility is shown on Table 7.1-1.

Since public information activities occur at the JIC, CNS has not dedicated an area within the EOF for media representatives.

The EOF has an area dedicated for state Public Information Officers to inform counterparts located in the JIC of the events which are occurring at CNS.

The NPPD Designated Spokesperson located in the JIC is responsible for all interfaces with the media. The Designated Spokesperson and the JIC Support Staff will receive information on plant status from designated personnel located in the EOF and will interact with state Public Information Officers as required.

7.3 COMMUNICATIONS SYSTEMS AND NOTIFICATION

7.3.1 PLANT COMMUNICATIONS EQUIPMENT

On-site communications are provided by:

- Site PBX.
- EOF and JIC telephones, which are connected to the CNS PBX via NPPD owned fiber cable backed up by leased circuits.
- CNS On-Site Cell Phone System.
- Station Intercom/Gaitronics.
- Alternate Intercom System.
- FM Radio Systems with remote control consoles located in the Control Room and the Central Alarm Station, Secondary Alarm Station, TSC, OSC, and EOF (further described in Sections 7.3.4.1 and 7.3.4.2).

7.3.2 TELEPHONE COMMUNICATIONS

Telephone communications to off-site organizations are provided by the following:

- Trunks in buried cable connecting PBX to the central office at Brownville, Nebraska.
- Federal Telecommunications System (FTS) Telephone System including Emergency Notification System (ENS) and Health Physics Network (HPN) circuits. The ENS circuit of this system is manned 24-hours a day at the Control Room and NRC Headquarters.
- Trunks connecting the PBX to the N.P.P.D. microwave telephone network.
- Several local numbers connecting telephones located in several places throughout the plant to the local service provider's Central Office in Brownville, Nebraska.
- The State Notification Telephone System's dedicated lines will ring the Nebraska State Patrol, Missouri State Patrol, Atchison County 911 Center, Nemaha County Sheriff's Department, and the Richardson County Sheriff's Office. The use of law enforcement agencies and emergency services dispatch centers as the initial points of contact provides 24-hour coverage. The dedicated lines listed also have extension lines in the following facilities: Nebraska State Emergency Management Agency EOC, Missouri State Emergency Management Agency EOC, Atchison County EOC, Nemaha County EOC and the Richardson County EOC. Once the EOCs are operational, notifications may be made using the extension lines at the EOCs with the concurrence between the respective EOC and the law enforcement and emergency services dispatch agencies.

The CNS telephone system is split into two functional networks; one for normal business operations and one for emergency communications (CNS Emergency

Preparedness (EP) telephones). Function of the CNS EP telephones is described below.

Should the PBX lose AC power, the PBX and on-site Emergency EP analog telephones will automatically switch to back-up battery power. These batteries will power the PBX for approximately 6 hours. The Control Room digital telephones automatically switch to back-up battery power, and can also be powered from a site Emergency Diesel Generator. TSC and OSC digital telephones do not have battery back-up power, but can be powered from a site Emergency Diesel Generator. EOF and JIC telephone function is very similar to the telephones on-site at CNS. These telephones are connected to the CNS PBX via NPPD owned fiber cable backed up by leased circuits. Should there be a loss of AC power, a back-up source is available to power the telephone system.

If the PBX connectivity were to be interrupted, network routers would go into a survivable mode, in which select telephones would have direct access to the local telephone service provider's Central Office (CO) lines. If the PBX System should fail, the system is designed to connect several extensions, designated as bypass telephones, directly to the local telephone service provider's CO lines.

National Warning System (NAWAS) is installed, monitored, and operated from the Control Room. NAWAS, which is manned 24-hours a day, is a Nationwide Telephone System primarily for attack warnings.

7.3.3 SATELLITE TELEPHONES

Should all installed means of off-site communications fail, CNS has remote satellite telephone extensions located in the Control Room, TSC, EOF, and JIC. Handheld satellite phones are also available for Fire Brigade and Field Monitoring Teams.

7.3.4 RADIO COMMUNICATIONS

For use both on-site and off-site are provided by:

7.3.4.1 TWO-WAY FM RADIO SYSTEM (BASE 1 AND BASE 2)

- A system used primarily by in-plant Operations/Emergency Response personnel.
- It is possible to operate this system either base-to-portable or portable-to-portable. The range of the Base 1 System at maximum would be approximately 20 miles.

7.3.4.2 TWO-WAY FM RADIO SYSTEM (LOW BAND)

- This Low Band System is primarily used by off-site field monitoring personnel.
- This Radio System can be used for communications between CNS and CNS EP vehicles.

- At CNS ERFs three remote control heads are accessible, one each in the Control Room, OSC, and the EOF. Low band radio consoles are also located in CAS, SAS, and the 345 kV Substation.

7.3.4.3 COMMUNICATIONS WITH THE NEMAHA COUNTY SHERIFF'S DEPARTMENT

- The CNS Two-Way Radio System can be used for communicating between the Control Room, Security Alarm Stations, OSC, and the EOF to the Nemaha County Sheriff's Department located in Auburn, Nebraska, on the Sheriff's Department frequency or State-wide radio frequencies.

7.3.4.4 CNS SECURITY DEPARTMENT COMMUNICATIONS

- The CNS Security Department uses its own Two-Way Radio Systems operating in the 460 and 800 Mhz.

7.4 NOTIFICATION BY EMERGENCY CLASS

Notification schemes detailed by specific emergency classification including notification of the general public are contained in EPIP 5.7.2, 5.7.6, 5.7.27, and 5.7.23.

The four classes of emergency defined in Section 4 require varying degree and scope of emergency response. The emergency organization for a NOTIFICATION OF UNUSUAL EVENT classification consists of the normal shift personnel. Normally, no further site emergency staff augmentation is required, although several members of Station Management, including Senior Management personnel are notified. Notification of responsible State and Local Governmental Agencies, and well as the NRC, will also be performed.

In an ALERT classification, the TSC, EOF, and OSC will be activated. Notification of state, local, and NRC authorities, as well as Station Management and Staff will be initiated.

SITE AREA EMERGENCY and GENERAL EMERGENCY classifications require complete activation of all Emergency Response Facilities, including State and Local Emergency Operations Centers (EOCs). The complete emergency response notification scheme, depicted in Figure 7.4-1, shall be initiated.

7.5 ENVIRONMENTAL ASSESSMENT CAPABILITIES

This section outlines the equipment available at CNS for the evaluation and assessment of emergency conditions. Some of this equipment is used in the initial evaluation and classification of the emergency as described in Section 4. Other equipment and capabilities described in this section are used in the assessment, mitigation, and subsequent analysis and monitoring of areas, equipment, and the environment. In some cases equipment may serve for both initial and continual assessment.

7.5.1 SEISMIC MONITOR

A seismic event monitor and recorder is located in the Control Room. This instrument, in conjunction with assessment of equipment damage within the station, will be a primary factor in determining the emergency condition and classification as a result of a seismic occurrence. Detailed seismic information can be obtained from the Conservation and Survey Division of the University of Nebraska. Additional seismic information can be obtained from the U.S. Geological Survey office of Earthquake Studies in Golden, Colorado.

7.5.2 METEOROLOGICAL MONITORING

One meteorological monitoring site is located at a grade elevation of 889 feet above mean sea level. A 100-meter tower located approximately 2,655 feet from the northwest corner of the Reactor Building is used to gather the meteorological data. The 100-meter tower has two independent Meteorological Monitoring Systems (A and B) and gathers data at three levels, 100 meters, 60 meters, and 10 meters. The redundant signal cables from the tower to the plant are located in either protected duct banks or directly buried in separated routings so that only one path can be interrupted at a time due to construction or other activities. Digital data is available through PMIS. The Meteorological Monitoring System is powered locally from the 12.5 kV ring bus and from MCC "L" in the event of a loss of off-site power condition. The system monitors and continuously records the following:

- Wind speed and wind direction are measured continuously at all tower levels. Wind system components include sonic anemometers and heaters. The range for wind direction is $0-360^{\circ} \pm 3^{\circ}$. The range for wind speed is $0-112 \text{ mph} \pm 0.336 \text{ mph}$ accuracy up to 11 mph with accuracy increase to $\pm 2\%$ above 11 mph.
- The A and B Systems on the tower calculate 15-minute averages of Sigma Theta. Sigma Theta is calculated and updated every minute for the 15-minute time constant. The sigma theta values are then accessed by the Data Acquisition System.

- Air temperatures are monitored at all six locations on the tower. Each temperature system on the tower is comprised of a platinum RTD temperature probe and motorized aspirated radiation shield to monitor the temperature at the various levels. The estimation of atmospheric stability for the A and B Systems is then calculated based on the vertical temperature difference between the 100-meter, 60-meter, and 10-meter tower elevations. The range and accuracy are -58 to +122°F ± 0.18°F not to exceed 0.18°F between tower vertical calibration points.
- Dewpoint is calculated using output from an aspirated humidity sensor and ambient temperature measurement at the ten-meter level on the tower.
- Precipitation is measured using an electrically heated rain and snow gauge located near the base of the tower. This gauge uses the tipping bucket method to measure all forms of precipitation. The instrument has an accuracy of ± 1% from 1 to 3 inches/hour and 3% overall from 0 to 6 inches/hour.

Backup meteorological data may be obtained from the National Weather Service Office located in Valley, Nebraska, which offers projected windspeed, wind direction, and temperature up to the 10,000-foot level. Information can be obtained by telephone or NAWAS.

7.5.3 MISSOURI RIVER MONITORING

CNS is located on the Missouri River, river mile 532.5. This river is the only water source in the area that has the potential for causing major flood damage. Operations personnel record the river level once per shift. Backup information concerning river level and flow is available from the U.S. Geological Survey Station in Nebraska City, Nebraska, via the U.S. Geological Survey in Council Bluffs, Iowa.

7.5.4 RADIOLOGICAL MONITORS

CNS maintains a Radiological Protection Program and related radiological equipment in accordance with NRC Regulations, guidelines, and recommended practices. This program, including personnel, procedures, and equipment is periodically inspected by the NRC. The program provides manpower and equipment to evaluate, assess, and perform follow-up action for radiological emergencies. In addition to the equipment used in normal radiological controls, a special inventory of emergency equipment is maintained both on-site and off-site for emergency radiological response. State Radiological Health Departments, nearby nuclear plants, Federal Radiological Assistance Plan Teams, and private organizations such as the Institute of Nuclear Power Operations and General Electric may be requested to provide manpower and radiological monitoring equipment during an emergency situation. Equipment vendors may also be contacted to provide equipment needed in an emergency situation.

The instrumentation listed below at the described locations is used to evaluate radiological conditions and assess the radiological risks. Tables 4.1-1 through 4.1-4 may require the use of indications from these sources in classifying emergencies.

7.5.4.1 EFFLUENT RELEASE POINT MONITORS

Each effluent release point is continuously monitored for particulates, radioiodines, and noble gases. The fixed filters and radioiodine absorbing charcoal cartridges may be changed and taken to the radiochemistry laboratory for analysis and release level determination. Noble gas samples may also be taken and analyzed, or release rate versus monitor readings may be used to determine release rates for each effluent point. The CNS effluent monitors are capable of monitoring releases during normal and accident conditions.

7.5.5 MAIN STEAM LINE MONITORS

The four main steam lines are continuously monitored for radiation level. This instrument system consists of four channels, which contain the following:

- An ionization chamber, used to measure the steam radiation level as it leaves primary containment.
- A logarithmic monitor with local readout located in the Control Room.
- An annunciator for low/inop, high, and high/high radiation readout located in the Control Room.
- A recorder is located in the Control Room and is provided to continuously monitor four channels. If radiation levels increase above the alarm setpoint, visual and audible alarms are actuated in the Control Room.

7.5.5.1 STEAM JET AIR EJECTOR MONITORS

Off-gas radiation levels are continuously monitored by the Steam Jet Air Ejector Monitors. Each monitor system consists of an ionization detector with readouts and recorder in the Control Room. Calibration curves relate count rate and flow versus release rate at the Steam Jet Air Ejectors. This flow path is independently monitored at the Elevated Release Point by monitors described in Section 7.5.4.1.

Measurement is made upstream of the 30-minute holdup line. If the alarm setpoint is exceeded and the alarm does not clear within 15 minutes, the off-gas holdup line isolates and the reactor will be shutdown.

7.5.5.2 AREA RADIATION MONITORS

Areas within CNS are monitored with permanently mounted Area Radiation Monitors. Many of these monitors have local level indications and local audible and visual alarms, including level indications and audible and visual alarm annunciation in the Control Room. Area Radiation Monitors are in locations that may be occupied by station personnel or where higher than normal radiation levels may indicate system malfunction. The alarm setpoints are based on the normal operational radiation background surrounding each individual monitor. Any abnormal increase in radiation levels will produce an annunciator alarm in the Control Room. A continuous record of this monitor system is provided on a Control Room multipoint recorder. Area Radiation Monitors located inside the primary containment will alert personnel to abnormal radiation increases.

7.5.5.3 LIQUID RADIOACTIVITY MONITORS

Changes in the levels of radioactive material within a liquid system with its subsequent radiation level change is normally monitored by the Area Radiation Monitor System. The Reactor Equipment Cooling System, the Radioactive Liquid Effluent Line, and the Service Water Cooling System each have detectors, which continuously monitor radioactivity level. A readout, visual and audible alarms, and recorder are provided in the Control Room.

7.5.5.4 CONSTANT AIR MONITORS

In addition to the Gaseous Effluent Release Points described in Section 7.5.4.1. Constant Air Monitor units analyze surrounding building air. These units filter the air onto fixed particulate filters or iodine filters and monitors them for radioactivity level. Two of these monitors are normally stationed on the refueling floor, one monitoring for particulate radioactivity and the other monitoring for iodine activity. These Constant Air Monitors are mobile and may be stationed at strategic locations within the station. Each has a local activity readout and visual alarm functions.

7.5.5.5 PORTABLE AIR SAMPLING EQUIPMENT

In addition to the constant air monitors described above, portable air sampling equipment is also available. Three basic types of portable air samplers are provided at the station. Particulate and iodine samplers, both high volume and low volume, may be used. These types of air samplers circulate air through a particulate filter and then through a radioiodine absorbing charcoal cartridge. The filters and charcoal cartridges are then analyzed for airborne radioactivity. Radioanalysis of these air samples are normally performed in the CNS Radiological Protection Counting Room or the Radiochemistry Laboratory.

Both silver zeolite charcoal and conventional charcoal cartridges are available for use with portable air samplers. The use of conventional cartridges requires the extra step of purging noble gases prior to analysis for radioiodines. Facilities to purge these gases are available in the Radiochemistry Lab. Air samplers are also available in the emergency lockers described in EPIP 5.7.21. The Nebraska and Missouri State Radiological Health Departments also have air-sampling equipment available for off-site surveys. In addition, nearby nuclear plants, as well as the Department of Energy (DOE) via the NRC, may be requested to provide air-sampling backup.

7.5.5.6 PROCESS MONITORS

System readouts, scaled to provide normal and abnormal primary system parameter indications, are displayed in the Control Room. Such parameters include, but are not limited to, pressure, temperature, level indication, and flow rates. Each parameter will normally have alarm setpoints with audible and visual alarm capabilities when setpoints are exceeded. Particular Instruments also have recorder capabilities, which serve as a record of system performance. Process monitors, their alarms, annunciators, and recorders, give indication of system performance. Process monitors serve as indicators to alert station personnel of emergency situations. Monitor indications, in conjunction with the Emergency Action Levels discussed in EPIP 5.7.1, are used to initiate emergency measures and aid in the evaluation and assessment of such emergency situations.

7.5.6 ENVIRONMENTAL RADIATION SURVEILLANCE

The CNS Environmental Radiation Surveillance Program was initiated in 1970. The initial phase determined background levels of radioactivity in the environment around CNS. The Environmental Radiological Program has continued throughout plant startup, pre-operational testing phases, and operation of the station.

This program basically consists of the aspects described below:

- Radiation monitoring within a ten-mile radius, which is accomplished by the use of Dosimeters of Legal Record (DLRs). In addition, the NRC and State Health Departments have placed thermoluminescent dosimeters in areas surrounding the station.
- Continuous air sampling is performed within a ten-mile radius of the station. Air sampling stations collect airborne particulates on stationary filters, then pass this filtered air through charcoal cartridges to collect gaseous radiolodines.
- Samples which are periodically taken for environmental radiological assessments include:
 - Missouri River water samples.
 - Ground water samples.
 - Vegetation samples.
 - Milk samples.
 - Fish samples from Missouri River.
 - Sediment from Missouri River shoreline.

The environmental program analyzes a wide variety of samples from the environment for radiological concerns. In case of an emergency affecting off-site radiological parameters, any phase of this program may be used to assess the situation. In addition, portable air sampling equipment for particulates and radiolodines is available for gaseous release emergencies; dose rate instruments and analytical capabilities are available for environmental assessment. The State(s) Department of Health, other nuclear plants, and the DOE via the NRC are also available to aid in environmental assessments.

7.5.7 RADIOANALYSIS LABORATORIES

The radiochemistry laboratory and Radiological Protection Counting Room, located in separate buildings from the reactor, are used to analyze on-site and off-site emergency monitoring samples. These facilities are equipped with analytical instruments capable of measuring radionuclides and their associated emergency concentrations in environmental samples. Gross radiation level instrumentation is also available in the EOF. The State(s) Health Department and Omaha Public Power District's Fort Calhoun Nuclear Station may also be requested to assist in the analysis of environmental monitoring samples.

7.6 FIRE PROTECTION

Although the Fire Protection System is not detailed in the CNS Emergency Plan, the type, location, and severity of a fire may prompt this Emergency Plan to be implemented. CNS maintains a Fire Protection System in accordance with NRC regulations, which is periodically inspected by the NRC to verify fire protection capabilities. CNS has its own fire pumps with backup capabilities and distribution systems, including numerous hose and hydrant stations, automatic sprinkler system, and fire barriers. Materials used meet fire code requirements. An on-site emergency fire house containing portable fire fighting equipment is maintained and periodically inventoried. Smoke detectors, heat detectors, visual means, and Control Room annunciation of the fire system serve as indicators of fire location and severity.

7.7 EMERGENCY LOCKERS

Emergency lockers containing respiratory protection equipment, air sampling equipment, survey equipment, and other emergency type equipment are located in the Control Room and the CNS Emergency Response Facilities. An emergency rescue locker is located in Administration Building, level 903' near the entrance to the RCA. EPIP 5.7.21 lists the locations and minimum inventory requirements for the emergency lockers, the station ambulance, and the Field Monitoring Team vehicles.

Respiratory protection equipment, protective clothing, survey equipment, sampling equipment, and other equipment for re-entry, rescue, or emergency operations will be provided from these emergency lockers if normal station supplies are not available. Radioprotective tablets (Potassium Iodide) are stocked in emergency lockers and are available on a voluntary basis to emergency response personnel as conditions dictate. These tablets will be distributed only with the permission of the Emergency Director.

These lockers will remain unlocked with a seal across the door, which will break when the doors are opened.

The contents of the lockers will be inventoried at least each calendar quarter and also after each use using EPIP 5.7.21. Any missing or expended items shall be replaced. A new seal will then be attached to the doors. Any time a locker seal is found broken, the contents of the locker will be promptly verified by inventory of the contents.

The procedures and associated attachments available in the emergency lockers will be updated as required.

7.8 HABITABILITY EQUIPMENT

Control Room shielding and ventilation are designed to allow personnel habitability during Design Basis Accident Conditions. The TSC/OSC has shielding and ventilation similar to the Control Room for habitability during the course of an emergency. The TSC/OSC Ventilation System is not seismic qualified, redundant, instrumented in the Control Room, or automatically activated. In the unlikely event the OSC is not habitable, an Alternate OSC location is provided which has ventilation similar to the TSC/OSC. The EOF meets the habitability requirements of NUREG-0696 (Functional Criteria for Emergency Response Facilities). Portable radiation monitoring instrumentation, communications equipment, respiratory equipment, and protective clothing are available in or near the Control Room, TSC, OSC, and AOSC. Portable radiation monitoring instrumentation, communications equipment, and protective clothing are available in or near the EOF.

7.9 MEDICAL FACILITIES AND FIRST AID

7.9.1 MEDICAL FACILITIES

Arrangements have been made with the hospitals listed below for care of injured personnel, including cases involving radiological contamination and radiation over-exposure. Selection of the hospital and medical assistance will normally be based on obtaining the most rapid access to the necessary medical services, the capability of the specific hospital to provide the required services, and the preference of the injured personnel, if the type and severity of the injury permit.

- Nemaha County Hospital, 2022 13th Street, Auburn, Nebraska.
- University Nebraska Medical Center, Hixson-Lied Center for Clinical Excellence, East Side, 44th and Dewey, Omaha, Nebraska.

7.9.2 FIRST AID

First aid kits are available at strategic locations throughout the station. These kits are fully equipped with supplies and materials appropriate for use in radiological emergencies.

Figure 7.2-1
TSC Floor Plan

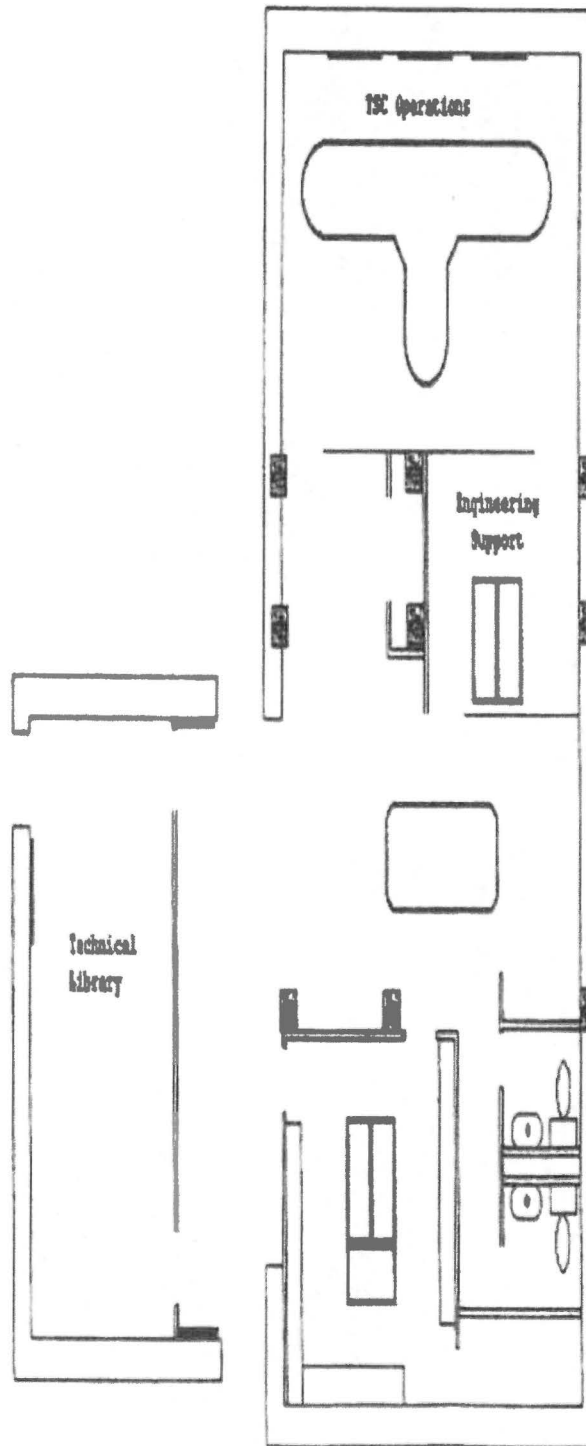


Figure 7.2-2
OSC Floor Plan

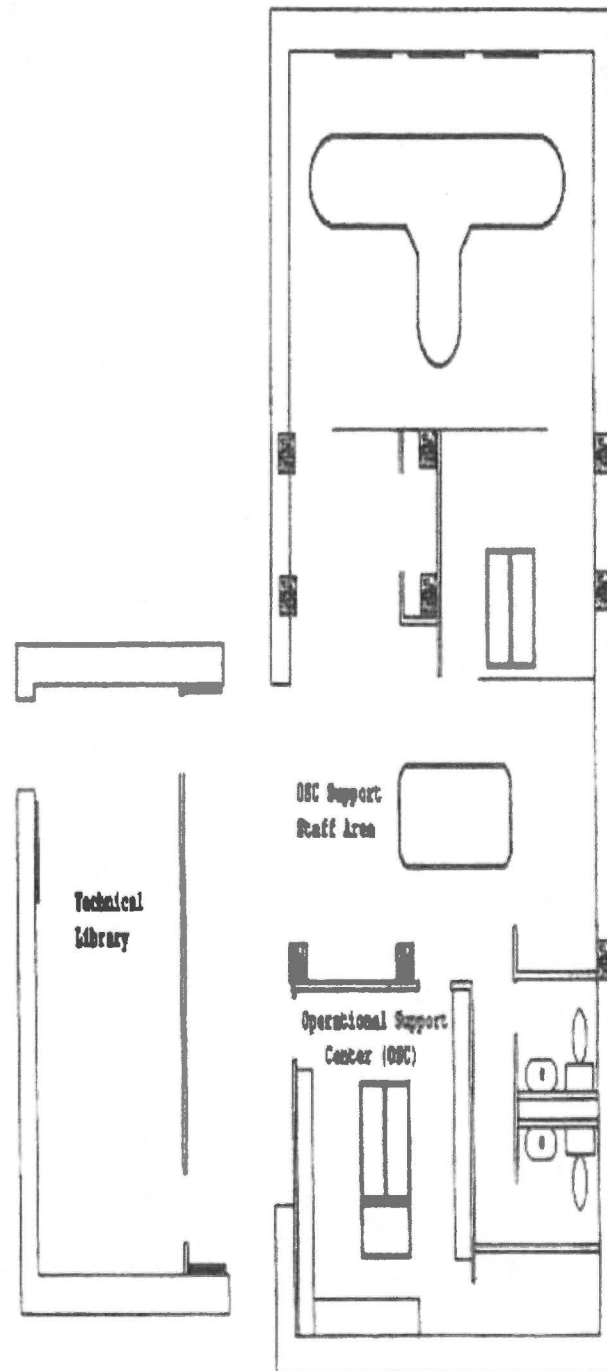


Figure 7.2-3
EOF Floor Plan

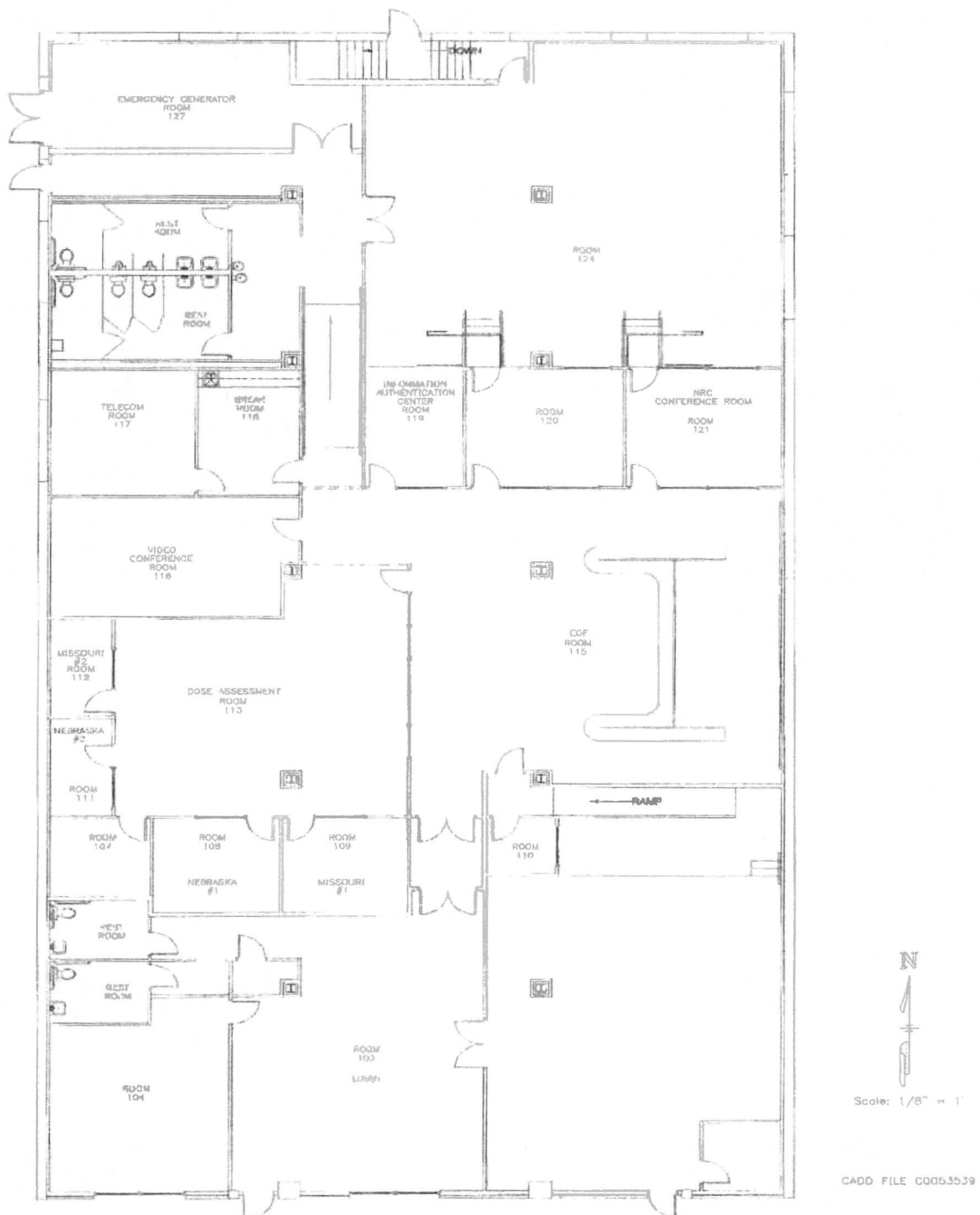
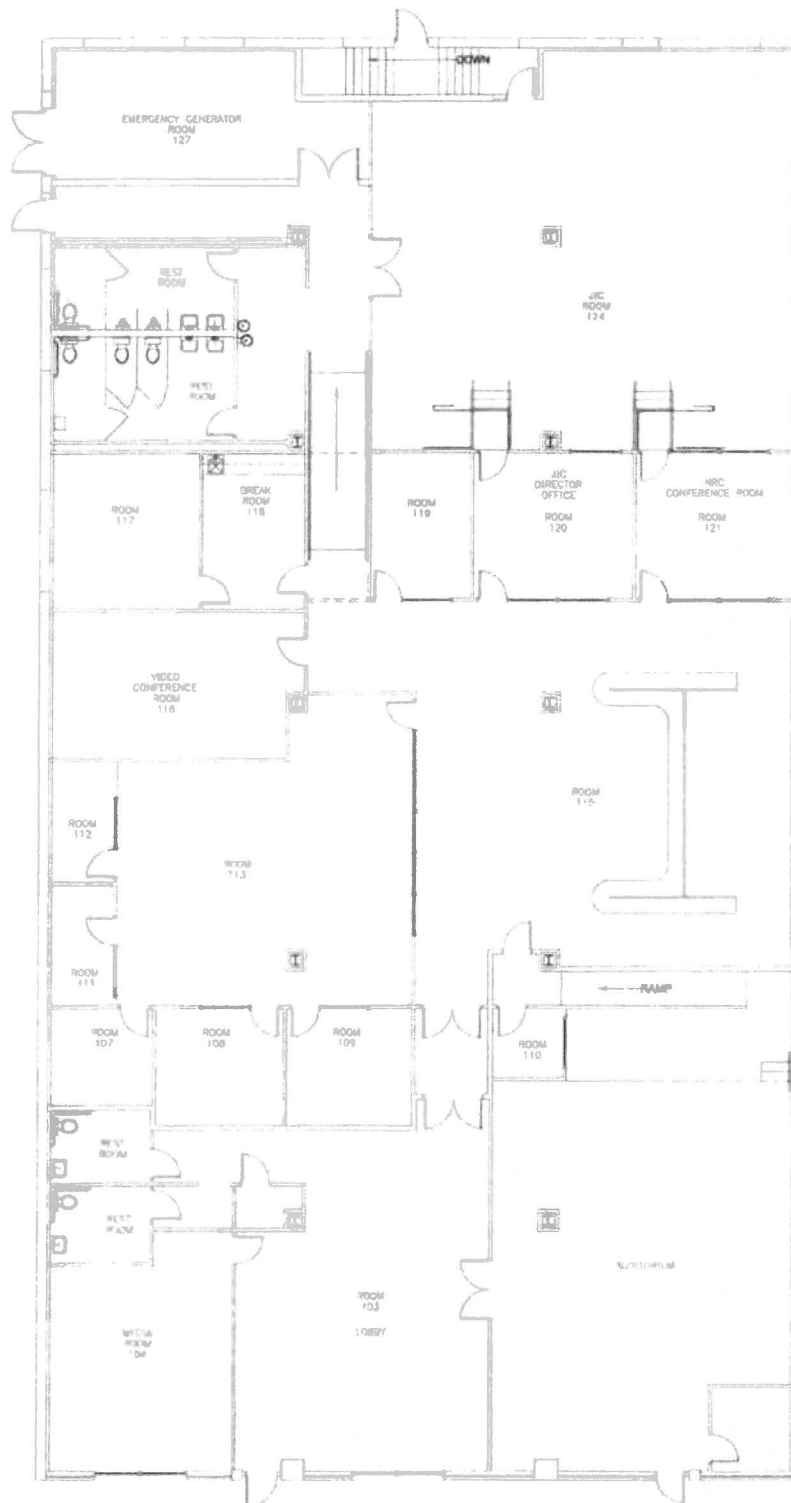


Figure 7.2-4
JIC Floor Plan



N
Scale 1/8" =

**Figure 7.4-1
Notification Chart for Emergency Classification**

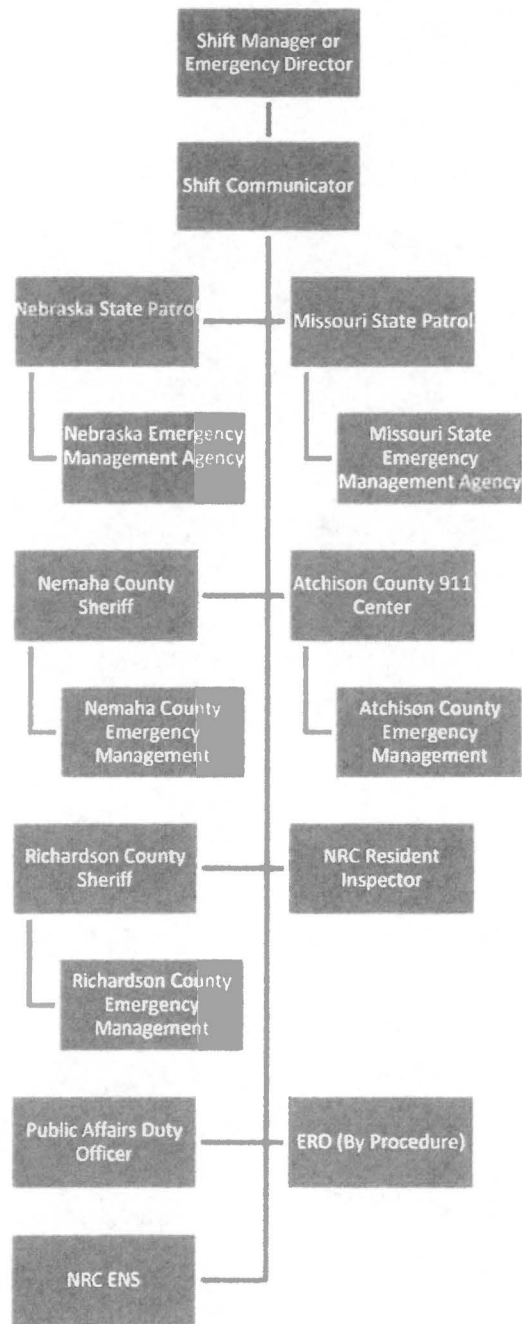


Table 7.1-1
ERF Communications Systems

COMMUNICATIONS SYSTEM	OSC	EOF	TSC	CR	JIC	AOSC
1. Telephone PBX	X	X	X	X	X	X
2. Station Intercom System "Gaitronics"	X		X	X		X
3. Alternate Intercom System	X	X	X	X	X	X
4. FTS 2001SYSTEM						
• ENS Telephones to NRC		X	X	X		
• HPN Telephones to NRC		X	X			
• RSCL Telephones to NRC		X	X	X		
• MCL Telephones to NRC		X				
• PMCL Telephones to NRC		X	X			
5. NPPD Microwave Network	X	X	X	X	X	X
6. Telephone extensions to Local Exchange		X	X	X	X	
7. NAWAS				X		
8. CNS State Notification Telephone System		X	X	X		
9. Radio Base Station Console (Base 1/Base 2)	X	X	X	X		
10. Nemaha County Sheriff's Dept. Radio	X	X		X		
11. NPPD State-Wide Radio System (Low Band)	X	X		X		
12. CNS On-Site Cell Phone System	X		X	X		X
13. Satellite Telephones		X	X	X	X	

8. MAINTAINING EMERGENCY PREPAREDNESS

Maintenance of the CNS Emergency Plan and Emergency Preparedness Program consists of: (1) training for NPPD emergency response personnel, (2) drills and exercises, (3) regular emergency plan review and evaluation, and (4) periodic inventory, maintenance, and testing of emergency facilities and equipment.

8.1 TRAINING

Emergency Preparedness training ensures that Emergency Response Organization (ERO) members will be familiar with applicable portions of the following Emergency Preparedness documents:

- NPPD Emergency Plan for CNS.
- NPPD Emergency Preparedness Implementing Procedures (EPIPs) for CNS.
- ERO Positional Instructional Manual Checklists (PIMs) for CNS.

8.1.1 TRAINING FOR CNS EMERGENCY RESPONSE ORGANIZATION (ERO)

ERO members may be stationed at CNS, Columbus General Office, or other NPPD offices. These employees may become members of the ERO by virtue of their normal job position, or may be selected to fill a position in the ERO based on their availability and/or personal qualifications.

Emergency Response Organization members will receive initial training which will be followed by requalification training. This training includes both knowledge-based and performance-based elements. Requalification training on knowledge based elements generally will be offered on a 12-month cycle not to exceed 15 months. Requalification training on performance-based elements will be offered on a calendar year basis. Exceptions to the requalification training periods are as noted in ERO Training Qualification Descriptions. Details are as noted in the ERO Training Qualification Descriptions. No employee will become an active member of the ERO until training has been completed and the individual has been qualified.

Training will be conducted in accordance with the ERO Training Program Procedure. Initial training will consist of formal sessions utilizing materials indicated by the ERO Training Program Procedure. This training will be followed by an evaluation of the student's comprehension of the subject material. Requalification training may consist of formal training, drills, exercises, or other alternate methods of completion as described by the ERO Training Program Procedure. Training records and documentation will be maintained by the Nuclear Training Department. The Emergency Preparedness Department is responsible for assuring that all appropriate emergency response personnel are adequately trained.

Training will be developed and utilized for areas, as required, per 10CFR50 Appendix E.IV.F, Training:

- Directors and/or coordinators of the plant emergency organization.
- Personnel responsible for accident assessment, including Control Room shift personnel.
- Radiological Monitoring Teams.
- Fire Control Teams (fire brigades).
- Repair and Damage Control Teams.
- First Aid and Rescue Teams.
- Medical support personnel.
- Licensee's headquarters support personnel.
- Security personnel.

Emergency Preparedness training material is identified in the ERO Training Program Procedure. A listing of training requirements and a synopsis of the course content is contained in this document. Fire Brigade, Security, and First Aid training have been established to fulfill requirements of other programs. Lesson plans addressing these areas have been developed and are taught under their respective training programs. Training materials will be revised to correspond with changes made to the Emergency Plan, Emergency Plan Implementing Procedures, or other supporting documents. Changes may be identified through drill and exercise performance.

8.1.2 TRAINING FOR EMERGENCY PREPAREDNESS DEPARTMENT PERSONNEL

Training for the Emergency Preparedness Manager and staff will be provided through participation in industry sponsored emergency planning symposia and workshops, as well as observation of drills and exercises of other utilities. This training will also be conducted on a 12-month cycle not to exceed 15 months. Documentation for such participation will be recorded and maintained by the CNS Training Department.

8.1.3 TRAINING FOR PARTICIPATING AGENCIES

Training for participating agencies is programmed by the individual agencies with aid from the State Governments in Nebraska, Missouri, Kansas, and Iowa. NPPD personnel are available to describe the special conditions and constraints involved in dealing with the station emergencies and any radiological release situations.

NPPD offers training annually for employees of the Nemaha County Hospital, Members of the Volunteer Fire Departments of Brownville, Nemaha, Peru, and Auburn, Local Ambulance Services, Local Emergency Management Personnel, and Local Law Enforcement Agencies.

This training includes notification procedures, basic radiation protection theory, and the identity, by position and title, of the individual in the on-site emergency organization who will control CNS emergency response activities.

8.1.4 PUBLIC EDUCATION

NPPD prepares educational material for annual distribution to the public within the 10-mile plume exposure Emergency Planning Zone (EPZ). The material is mailed to residents and is available for review at NPPD headquarters, CNS, the Nebraska State Emergency Management Agency, the Nebraska Department of Health - Division of Regulation and Licensure, and the Missouri State Emergency Management Agency. The material outlines the station's operational concept, defines the various classifications of emergencies, summarizes the emergency plan and procedures developed to safeguard the general public, reviews appropriate protective actions (i.e., in-house shelter, evacuation, etc.), and describes public warning signals and their meaning. Facts about radiation and contacts for additional information are included. The material is reviewed annually by NPPD and State and Local Emergency Management Agencies and updated as required.

To provide for the notification and education of the transient population within the 10-mile EPZ, NPPD has provided numerous copies of the information to the following:

- Missouri Tourist Information Center.
- Rock Port Rivers Edge Campground.
- All motels within the 10-mile EPZ.
- Indian Cave State Park.
- Brownville Historical Society.

In the event of an emergency at CNS, the owner, operator, etc., of each of these establishments has been instructed to distribute the material to any individuals occupying their facilities.

For special use areas within the EPZ, NPPD has made arrangements for the establishment of other means of notification of the transient population. Informational bulletin boards and/or signs have been established at Brownville recreation area, Brick Yard Hill Wildlife Area, Steamboat Trace Trail and river access boat ramps. At Indian Cave State Park an informational brochure includes information on what actions should be taken in the event of an accident at CNS.

8.1.5 MEDIA FAMILIARIZATION

Annual programs are conducted to acquaint media personnel with the CNS Emergency Plan, information concerning basic nuclear plant operation and radiation, and the locations and means employed to disseminate emergency information to the public. This activity may be performed in cooperation with the NPPD Corporate Communications Department.

8.2 DRILLS AND EXERCISES

Regular participation by station personnel in drills and exercises is designed to maintain emergency preparedness and test specific aspects of emergency plans, procedures, and equipment. Evaluation of these drills and exercises is conducted and revisions to the Emergency Preparedness Program are implemented to improve performance.

- 8.2.1 Provisions must be made to start a drill or exercise between 6:00 p.m. and 4:00 a.m. at least once in every eight-year exercise cycle. Some drills or exercises should be unannounced. Scenarios used shall provide reasonable assurance that anticipatory responses will not result from preconditioning of participants. Scenarios must include a wide spectrum of radiological releases and events, including hostile action. Exercise and drill scenarios as appropriate must emphasize coordination among onsite and offsite response organizations.
- EXERCISES**

An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within the Emergency Plan.

Emergency exercises (required biennially) are conducted annually and simulate events that may result in off-site radiological releases to the extent requiring response by off-site authorities. In accordance with the Nuclear Regulatory Commission (NRC) and the Federal Emergency Management Agency (FEMA) rules, these exercises are conducted jointly with participating federal, state, and local government agencies to assure effective response to major emergency situations. These combined exercises are coordinated by the CNS Emergency Preparedness Department with State and Local Emergency Planning Personnel.

Objectives for joint exercises are developed by NPPD with the states of Nebraska, Missouri, Kansas, and Iowa as appropriate. Scenarios shall vary from exercise to exercise and are developed to ensure that essential portions of plans and organizations are tested within an eight-year cycle and to ensure that the scenarios include at least the following:

- Statement of basic objectives and evaluation criteria.
- Date, time, place, and participating organizations.
- Simulated events.
- Time schedule of initiating events.
- Narrative summary describing exercise particulars which may include such things as simulated casualties, off-site medical assistance, rescue of personnel, deployment of Radiological Monitoring Teams, and public information activities.
- Provision for proper utilization of observers.

Initial critiques will be held at each facility immediately following termination of the exercise. A synopsis of the exercise critique process is as follows:

Players critique their own performance, noting areas requiring improvement. Evaluators then present their initial findings to the players. Players have the opportunity to provide evidence to the Evaluators of actions taken for which they did not receive credit. Evaluators then prepare their critique findings. This includes categorizing each finding using the following definitions.

- | | |
|-------------------|--|
| Deficiency | - Demonstrated or observed inadequacies, whether a single isolated case or a collection of observations, that indicate the state of emergency preparedness is not adequate to protect the health and safety of the public. |
| Weakness | - Demonstrated or observed inadequacies, that require corrective action, but when considered by themselves do not adversely impact the health and safety of the public. |
| Improvement Items | - Demonstrated or observed problem areas that are not considered to adversely affect the health and safety of the public, but correction would enhance the level of preparedness. |

Evaluators should help identify the root cause and, if possible, provide a solution for deficiencies. Evaluators should also help provide insights and/or solutions for weaknesses.

The Emergency Preparedness Department conducts a meeting of the Lead Evaluators where categorized critique items are formatted for presentation to CNS Sr. Management. Exercise findings are then presented to the NRC. The Emergency Preparedness Manager will ensure that Exercise findings are tracked and resolved as appropriate.

At the conclusion of joint exercises, FEMA, NRC, and State Observers will also conduct critiques. Formal evaluations of these exercises published by federal or state authorities will be reviewed by NPPD Management. Areas found to be deficient or weak will be identified and corrective actions implemented.

The Safety Review and Audit Board, as well as the NPPD Quality Assurance Department, will perform periodic audits of the Emergency Preparedness Program and may serve as observers during exercises.

8.2.2 DRILLS

A drill is a supervised instruction period aimed at testing, developing, and maintaining skills in a particular operation.

Emergency drills are conducted on a scheduled basis with emphasis placed upon the orderly implementation of activities prescribed within the Emergency Plan and EPIPs. Guidelines for administering drills are in place to ensure a quality drill program.

Drill performance is critiqued by personnel acting as drill Evaluators who may offer on-the-spot corrections to deficient performance. Each Evaluator is assigned to evaluate drill performance in a specific area of emergency response. A written evaluation of drill performance is provided to CNS Management by the Emergency Preparedness Manager.

Based on the results of these critiques, including participants' comments, follow-up action is then recommended by the Emergency Preparedness Manager, with action items assigned by the appropriate level of management.

Drills for the station staff are conducted periodically to: (1) test response timing and familiarity with implementing procedures and methods, (2) test emergency equipment, (3) ensure that emergency response organization personnel are familiar with their duties. Certain drills (i.e., fire, communications and notification, and medical emergency) are coordinated with off-site participating agencies. The Emergency Preparedness Manager has the overall responsibility for preparing, scheduling, and conducting emergency drills.

A brief description of the type of drills conducted at CNS follows:

8.2.2.1 FIRE DRILLS

Fire drills are conducted in accordance with plant Technical Specifications.

8.2.2.2 MEDICAL EMERGENCY DRILLS

A medical emergency drill or exercise involving the treatment of a simulated contaminated person is conducted once per calendar year with provision for participation by local support service agencies.

8.2.2.3 RADIOLOGICAL MONITORING DRILLS

These drills are conducted annually for on-site and off-site personnel assigned to radiation survey and Field Monitoring Teams. They shall include operation of instruments, tests of field communications equipment, interpretation of radiation readings, calculation of dose rates, collection of sample media (soil, water, vegetation, and air) and record keeping.

8.2.2.4 RADIOLOGICAL PROTECTION DRILLS

Radiological Protection drills are conducted semi-annually, generally in connection with joint exercises or radiological monitoring drills. They involve analyses of simulated elevated radiation levels, both liquid and airborne, as well as direct radiation measurements in the environment.

Analyses of in-plant liquid samples including the use of the Post-Accident Sampling System will be conducted on an annual basis.

8.2.2.5 COMMUNICATIONS DRILLS

Communications systems are periodically tested during normal use, CNS security checks, and scheduled tests, as well as during emergency drills and exercises. The CNS telephone System, Microwave Communications System, Site Radio System, and Plant Intercom System are used daily during normal plant operation. The NRC ENS is tested daily by phone check from NRC Headquarters and monthly from CNS to NRC Headquarters from the Control Room, Technical Support Center (TSC), and Emergency Operations Facility (EOF). The NRC Health Physics Network (HPN) direct telephone is tested monthly from the TSC and EOF. The State Notification Telephone System is tested monthly.

8.3 EMERGENCY PREPAREDNESS DEPARTMENT

To ensure the maintenance and implementation of the Emergency Preparedness Program, several Emergency Preparedness positions at CNS have been established. A CNS Emergency Preparedness Manager reports directly to the Director of Nuclear Safety Assurance. Emergency Preparedness Coordinator (EPC) positions have been established with each assigned a primary area of responsibility. Each EPC reports directly to the Emergency Preparedness Manager. An Emergency Preparedness Specialist (EPS) position has also been established to assist in the conduct of Emergency Preparedness Department Activities. The EPS reports directly to the Emergency Preparedness Manager.

A Nuclear Instructor - Emergency Preparedness (NI-EP) position has been established with responsibilities to implement requirements of the Emergency Preparedness Training Program. The NI-EP also reports directly to the Emergency Preparedness Manager.

All of the above positions have been established to:

- Maintain continued coordination with State and Local Emergency Planners on the status of Emergency Preparedness including budgetary issues.
- Annual review and development of revisions to the CNS Emergency Plan and Implementing Procedures.
- Coordinate drills and other aspects of the NPPD Emergency Preparedness Training Programs.
- Coordinate the development and implementation of the annual exercise.

- Ensure that adequate District resources are available to support the NPPD Emergency Preparedness program.
- Assist the EP Manager with the following:
 - All emergency preparedness activities at the CNS site.
 - Emergency preparedness and public relations with the local communities; includes medical facilities.
 - Alert and Notification System including fixed siren maintenance and testing and Emergency Alert System radio distribution and maintenance.
 - Emergency Response Facility readiness.
 - Implement requirements of the EP Training Program including development and revision of CNS EP Training Lesson Plans, and maintenance of EP training records.
 - Responsibilities as defined in the Emergency Plan and EPIPs.
 - NRC and FEMA interface.
 - Audits; includes Quality Assurance audits per 10CFR50.54(t) and NRC Inspection Report response submittal.
 - Meteorological and dose assessment.
 - Annual exercise; includes scenario preparation.
 - Emergency Preparedness Drills.
 - Responsibilities as defined in the Emergency Plan and EPIPs.
 - NRC and FEMA interface functions relating to the above areas.

8.4 CORPORATE COMMUNICATIONS DEPARTMENT

The CNS Emergency Preparedness Program relies on support from the NPPD Corporate Communications Department. Personnel within this department are responsible for:

- Interface with the CNS Emergency Preparedness Department.
- Interface with other agency Public Information Officers.
- Emergency planning public information material to include mailing list control revision, reprint, and mailout of the material.
- Media interfaces which may include conferences, quarterly newspaper and radio ads for the CNS Alert and Notification System testing program, media monitoring, and JIC activities.
- Training in the above areas.
- Responsibilities as defined in the Emergency Plan and EPIPs.

8.5 REVIEW AND UPDATE OF THE EMERGENCY PLAN

The CNS Emergency Plan is reviewed annually and revised, as necessary. The annual review and update is documented by the CNS Emergency Preparedness Manager. Special attention is devoted to reviewing station-government agency interfaces, maintaining effective communication channels, and, on a quarterly basis, ensuring the accuracy of the contact and notification lists to verify telephone numbers and the responsible individuals to be contacted. Liaison with State and Local Agencies ensures uniform updating and plan improvement. All revisions to the Emergency Plan shall be reviewed and approved by the Station Operations Review Committee prior to implementation.

A review of EALs shall be conducted by NPPD with State and Local Emergency Management Personnel on an annual basis.

Independent audits of the various aspects of the Emergency Preparedness Program are conducted at least biennially by NPPD Quality Assurance Personnel per 10CFR50.54t and the results of such audits are reported to the Safety Review and Audit Board (SRAB). The Independent audit includes, but is not limited to, the Emergency Plan, Emergency Plan Implementing Procedures, training, readiness testing, equipment, and interfaces with State and Local Organizations. The results are considered by NPPD Management in modifying aspects of the plan. Audit documentation is maintained for at least five years. Revised or updated emergency plans and procedures are handled in accordance with document control procedures as delineated in the CNS Operations Manual. Distribution is controlled by the Emergency Preparedness Manager, via the Document Control Department.

8.6 MAINTENANCE AND INVENTORY OF EMERGENCY EQUIPMENT AND SUPPLIES

Quarterly inspections of the operational readiness of items of emergency equipment and supplies are conducted. Deficiencies noted during inspections are corrected in a timely manner. The use of EPIP 5.7.21, Maintaining Emergency Preparedness - Emergency Exercises, Drills, Tests, and Evaluations, in conjunction with the CNS Preventative Maintenance Tracking System and Emergency Preparedness Departmental Guides ensure equipment is ready for use. Sufficient reserves of instruments and equipment are maintained to replace those undergoing calibration or repair. Calibration of equipment is conducted at intervals set forth in Technical Specifications. In addition, the planned use of communications, first aid, fire fighting and radiation measuring equipment during scheduled drills further ensures the availability and operability of emergency equipment.

9. RECOVERY

This section of the Emergency Plan describes the initiating conditions and transitional steps required to move from Emergency Response Organization operations into Recovery Operations. With the safety of the public and station personnel being of the utmost priority, recovery operations allow for a smooth transition from the Emergency Response Organization operations to normal day-to-day operations.

Recovery operations will include measures taken during and immediately following the emergency, as well as the longer term post-emergency efforts. These operations will be performed by station and other NPPD personnel, and if required, by contract technical and labor support. Manpower and equipment resources supporting the individual functional segments of the Recovery Organization will vary according to the severity of damage and specific situational needs.

The Emergency Director will evaluate the effectiveness of corrective actions and determine if the emergency is under control. The following station conditions will serve as general guidelines for decisions whether the emergency is under control:

- Radiation levels are stable or decreasing with time.
- Releases of radioactive materials to the environment have ceased or are controlled within permissible license limits.
- Fire, flooding, or similar emergency conditions no longer constitute a hazard to the station or station personnel.
- Measures have been successfully instituted to correct or compensate for malfunctioning equipment.

Based on the consideration of these criteria as well as other pertinent items, the Emergency Director shall determine when to activate the Recovery Panel.

9.1 RECOVERY PANEL

If after evaluating the effectiveness of corrective actions, the Emergency Director determines that the emergency is under control, he will activate the Recovery Panel.

The panel may consist of the following personnel:

- Emergency Director.
- VP-Nuclear/CNO or his designee.
- Emergency Operations Facility (EOF) Director.
- Technical Support Center (TSC) Director.
- JIC Director (JIC).
- Radiological Control Manager (EOF).

Personnel acting on this panel can either be physically present or connected by telephone conference from their various Emergency Response Facilities. The purpose of the Recovery Panel is to evaluate emergency termination considerations, determine plant status parameters, and the planning and implementation of recovery operations. A time frame can then be established for securing emergency response and de-escalation of the emergency classification for recovery, if not already completed. Based upon this information, the VP-Nuclear/CNO or his designee may initiate the Recovery Organization.

9.2 RECOVERY ORGANIZATION

Once the decision has been made to activate the Recovery Organization, NPPD Emergency Response Facilities and their personnel shall be informed (via briefings, Public Address systems, telephones, etc.).

The JIC Director shall inform personnel at the JIC of the activation of the Recovery Organization. Depending upon the amount of media interest, the JIC may be deactivated at this time. Public Affairs duties and responsibilities would then be assumed by the Corporate Communications & Public Relations Manager and Staff. Other personnel at the JIC return to their normal work stations and support the recovery effort through their normal position functions.

The Emergency Director or his alternate shall inform personnel in the EOF, TSC, OSC, and Control Room of the activation of the Recovery Organization.

Depending upon current conditions, any of these facilities may be deactivated at this time. Once deactivated, personnel in these facilities would return to their normal work stations and support the recovery effort through their normal position functions. The Recovery Organization is the same as the normal Nuclear Power Group Organization described in Section 5, except the Corporate Communications & Public Relations Manager and the Corporate Environmental Manager are included in the organization.

9.3 RECOVERY EXPOSURE CONTROL

The General Manager of Plant Operations is responsible for ensuring that the Radiation Protection Manager evaluates the advisability of initiating re-entry. Information on existing conditions, interviews with employees involved in the emergency, regulatory dose guidelines, and when necessary, counsel from recognized experts will be utilized in formulating decisions on re-entry. The development and evaluation of these operations will be under the direction of the General Manager of Plant Operations. General Office support personnel will aid in the requisition of technical assistance, increased manpower, and special equipment.

During recovery and re-entry operations, actions will be pre-planned to minimize the amount of radiation dose to personnel. Access to areas will be controlled and radiation dose will be documented. Estimates of total population dose will be coordinated with state and federal authorities.

9.4 NUCLEAR SAFETY COMMITTEES

Normal safety review organizations, Station Operations and Review Committee (SORC), and Safety Review and Audit Board (SRAB) will continue to function throughout all recovery activities.

9.4.1 STATION OPERATIONS REVIEW COMMITTEE (SORC)

An on-site nuclear safety committee is provided to review all matters pertaining to nuclear safety in the operation of the nuclear facility. This committee is advisory to the General Manager of Plant Operations and the chairman is designated in writing by the General Manager of Plant Operations. Committee membership, responsibilities, and authorities are detailed in Station Procedures.

9.4.2 SAFETY REVIEW AND AUDIT BOARD (SRAB)

An off-site nuclear Safety Committee is provided to perform independent review and audit of station activities. SRAB is advisory in nature. Committee membership, responsibilities, and authorities are detailed in the SRAB Charter.

APPENDIX A
PROCEDURES IMPLEMENTING THE EMERGENCY PLAN

PROCEDURE NO.	TITLE
5.7.1	Emergency Classification
5.7.2	Emergency Director EPIP
5.7.3	Incident Command Post (ICP) Hostile Action Based Event Roles and Responsibilities
5.7.6	Notification
5.7.7	Activation of TSC
5.7.8	Activation of OSC
5.7.8.1	Activation of Alternate OSC
5.7.8.2	Activation of Alternate Off-Site OSC/TSC
5.7.9	Activation of EOF
5.7.10	Personnel Assembly and Accountability
5.7.11	Early Dismissal/Evacuation of Site Personnel
5.7.12	Emergency Radiation Exposure Control
5.7.13	Personnel Monitoring and Decontamination
5.7.14	Stable Iodine Thyroid Blocking (KI)
5.7.15	OSC Team Dispatch
5.7.16	Release Rate Determination
5.7.17	Dose Assessment
5.7.17.1	Dose Assessment (Manual)
5.7.18	Off-site and Site Boundary Monitoring
5.7.19	On-site Radiological Monitoring
5.7.20	Protective Action Recommendations
5.7.21	Maintaining Emergency Preparedness - Emergency Exercises, Drills, Tests, and Evaluations
5.7.23	Activation of the JIC
5.7.24	Medical Emergency
5.7.25	Recovery Operations
5.7.26	Long-Term Environmental Monitoring
5.7.27	Alert and Notification System
5.7.27.1	NOAA/EAS Radio Malfunction
5.7.27.2	False Activation of Alert and Notification System
5.7.28	Administration of Positional Instruction Manuals (PIMs)
5.7COMMUN	Communications
5.7ENS	ENS Communicator

APPENDIX A
PROCEDURES IMPLEMENTING THE EMERGENCY PLAN

PROCEDURE NO.	TITLE
0-EP-01	Emergency Response Organization Responsibilities
0-EP-02	Configuration Control of the Automated Notification System (ANS)
0-EN-EP-306	Drills and Exercises
0-EN-EP-308	Emergency Planning Critiques
TPP 101	Emergency Response Organization
TPP 102	Emergency Preparedness Staff Training and Qualification
EPDG 2 Attachment H-1	CNS Drill and Exercise Manual - Scheduling
EPDG 2 Attachment H-2	CNS Drill and Exercise Manual - Scenario Development
EPDG 2 Attachment H-4	CNS Drill and Exercise Manual - Drill and Exercise Preparations
EPDG 2 Attachment H-5	CNS Drill and Exercise Manual - Critique Process

Controlled copies of the CNS EIPs are maintained in all Emergency Response Facilities.

Summaries of each EIP and a cross-reference to the appropriate section of the CNS Emergency Plan is provided below.

5.7.1 EMERGENCY CLASSIFICATION

This procedure provides a means of classifying an event into one of four emergency classifications as described in Section 4 of the Emergency Plan.

An EAL is a pre-determined, site specific, observable threshold for a plant Initiating Condition (IC) that places the plant in a given Emergency Classification Level (ECL). An EAL can be: an instrument reading; an equipment status indicator; a measurable parameter (on-site or off-site); a discrete, observable event; results of analyses; entry into specific Emergency Operating Procedures; or another phenomenon which, if it occurs, indicates entry into a particular emergency classification level. EALs are utilized to classify emergency conditions. To the extent possible, the EALs are symptom-based. That is, the action level threshold is defined by values of key plant operating parameters that identify emergency or potential emergency conditions. This approach is appropriate because it allows the full scope of variations in the types of events to be classified as emergencies. However, a purely symptom-based approach is not sufficient to address all events for which emergency classification is appropriate. Particular events to which no pre-determined symptoms can be ascribed have also been utilized as EALs since they may be indicative of potentially more serious conditions not yet fully realized.

The CNS EAL methodology divides the EALs into 3 broad groups:

- EALs applicable under all plant operating modes - This group would be reviewed by the EAL-user any time emergency classification is considered.
- EALs applicable only under Modes 1, 2, or 3 - This group would only be reviewed by the EAL-user when the plant is in Hot Shutdown, Startup, or Power Operation mode.
- EALs applicable only under Modes 4, 5, or Defueled - This group would only be reviewed by the EAL-user when the plant is in Cold Shutdown, Refueling, or Defueled mode.

The purpose of the groups is to avoid review of EALs that cannot be applicable in the current operating mode of the plant. This approach significantly minimizes the total number of EALs that must be reviewed by the Emergency Director for a given plant condition and thereby speeds identification of the appropriate applicable EAL.

Within each of the above three groups, assignment of EALs to categories/subcategories - Category and subcategory titles are selected to represent conditions that are operationally significant to the EAL-user. Subcategories are used as necessary to further divide the EALs of a category into logical sets of possible emergency classification thresholds.

5.7.2 EMERGENCY DIRECTOR EPIP

This procedure provides a series of actions to be taken upon declaration of an Emergency Classification. Personnel shall be directed to use additional procedures to adequately respond to an emergency event. Certain actions may still need to be performed by the Shift Manager, as requested by the Emergency Director, after command and control of the emergency response has been transferred to the EOF.

5.7.3 INCIDENT COMMAND POST (ICP) HOSTILE ACTION BASED EVENT ROLES AND RESPONSIBILITIES

This procedure provides guidance on actions to be taken after a Hostile Action Based (HAB) Event has occurred or is occurring, including Incident Command Post (ICP) and Cooper Nuclear Station (CNS) interface, communications with off-site agencies, and bringing off-site agencies into the Protected Area.

5.7.6 NOTIFICATION

This procedure provides notification instructions to be followed upon declaration of an emergency condition. These include initial, follow-up, and event termination notifications to responsible State and Local Governmental Agencies and NRC notifications prior to TSC activation.

Upon declaration of an emergency condition, all notifications and communications will be handled from the Control Room (CR) until the Technical Support Center (TSC) and/or the Emergency Operations Facility (EOF) are activated. All telephone numbers needed for notification or follow-up information transmission are in the Emergency Telephone Directory located in the Control Room, Technical Support Center, Emergency Operations Facility, and other designated areas.

5.7.7, ACTIVATION OF TSC

5.7.8 ACTIVATION OF OSC

5.7.8.1 ACTIVATION OF ALTERNATE OSC

5.7.8.2 ACTIVATION OF ALTERNATE OFF-SITE OSC/TSC

5.7.9 ACTIVATION OF EOF

These procedures describe the sequence of events and the staffing requirements for the activation of the TSC (5.7.7), OSC (5.7.8), Alternate OSC (5.7.8.1), Alternate Off-Site OSC/TSC (5.7.8.2) and the EOF (5.7.9). They provide further information on the functions of the CNS ERFs (see Section 7.2 of the Emergency Plan).

5.7.10 PERSONNEL ASSEMBLY AND ACCOUNTABILITY

This procedure describes the immediate and on-going emergency personnel assembly and accountability actions to be taken by all on-site personnel including ERO members, Security personnel, contractors, and visitors in the event of a station emergency. It also provides a means to ascertain the names of missing individuals within 30 minutes and account for all on-site individuals continuously thereafter.

Since each site employee, Security Officer, visitor, and contractor is assigned a designated assembly area and each area is assigned a Designated Assembly Area Supervisor (DAAS) personnel accountability, in accordance with the discussions in Section 6.5 of the Emergency Plan, is assured.

5.7.11 EARLY DISMISSAL/EVACUATION OF SITE PERSONNEL

As discussed in Section 6.5 of the Emergency Plan, in the event of an emergency situation it may be desirable to minimize the number of non-ERO personnel on-site. If the emergency involves a radiological release or the potential for a release, then evacuation of non-ERO personnel is desirable, or may be required to minimize exposure to radioactive material.

This procedure provides an efficient means for evacuation of personnel from isolated areas or from the plant site in its entirety. Furthermore, it provides a definition of the duties and responsibilities of designated supervisory personnel associated with site evacuation.

5.7.12 EMERGENCY RADIATION EXPOSURE CONTROL

As indicated in Section 6.6 of the Emergency Plan, under certain emergency conditions it may become necessary for emergency workers to receive dose in excess of occupational limits established by 10CFR20. Dose limits for workers performing emergency services are contained in this procedure.

As indicated in the Emergency Plan and Procedure, the Emergency Director has the authority to authorize dose in excess of occupational limits. This dose is only justifiable if it is determined that benefits are being achieved, the dose is commensurate with the significance of the objective, and every reasonable effort is being made to maintain emergency workers dose As Low As Reasonably Achievable (ALARA).

The primary purpose of this procedure is to provide policy guidance, address required authorization, and set forth maximum criteria for emergency radiation dose control in the event emergency workers are required to exceed established annual dose limits.

5.7.13 PERSONNEL MONITORING AND DECONTAMINATION

As discussed in Section 6.6 of the Emergency Plan, the objectives of

personnel decontamination techniques are to promptly reduce radiation dose; to minimize the absorption of radionuclides, particularly radioiodine, into the body; and to prevent the spread of localized contamination.

This procedure provides instructions for decontamination of station personnel during emergency conditions utilizing normal decontamination facilities or alternate areas if necessary.

5.7.14 STABLE IODINE THYROID BLOCKING (KI)

The purpose of this procedure is to define under what emergency conditions Potassium Iodide (KI) should be administered to station personnel and who has the authority to determine when and at what dosages KI should be administered. The procedure also provides a discussion of the effectiveness of KI, the recommended dosage, as well as any precautions and potential side effects.

As indicated in Section 7.7 of the Emergency Plan, KI tablets are stored in the CNS emergency lockers and are available on a voluntary basis to emergency response personnel as conditions dictate. These tablets will be dispensed only with the permission of the Emergency Director (also see Section 6.5.5 of the Emergency Plan).

5.7.15 OSC TEAM DISPATCH

As defined in Section 6.5 of the Emergency Plan, if station personnel are unaccounted for in the initial or subsequent emergency accountability, the Emergency Director will assign an emergency team to locate, and if necessary, rescue them.

This procedure provides guidance and requirements necessary to conduct efficient rescue and re-entry operations. It presents the organization and operation of Rescue and Re-Entry Teams and identifies the precautions which should be observed by the Rescue and Re-Entry Teams (including equipment carried during search and rescue operations).

5.7.16 RELEASE RATE DETERMINATION

This procedure describes methodology for the manual determination of airborne radioactive release rates from the Elevated Release Point, Reactor Building vent, the Turbine Building vent, and the Augmented Radwaste Building vent utilizing effluent monitor readings.

Upon determination of release rates, actual or projected plume exposure dose may be calculated in accordance with EPIP 5.7.17, Dose Assessment or EPIP 5.7.17.1, Dose Assessment (Manual). This dose provides a basis for relating plume exposure dose to the EPA Protective Action Guides (PAGs) in accordance with EPIP 5.7.20, Protective Action Recommendations (see Section 6.3 of the Emergency Plan).

5.7.17 DOSE ASSESSMENT

This procedure provides a means for personnel to quickly predict off-site dose rates and integrated dose based on meteorological data, release rates, and dispersion.

5.7.17.1 DOSE ASSESSMENT (MANUAL)

This procedure provides a means for personnel to perform a plume centerline or non-centerline dose assessment including dose projections from multiple source releases using hand calculation methods when the CNS-DOSE computer program is not available.

5.7.18 OFF-SITE AND SITE BOUNDARY MONITORING

In the event of an accidental radiological release, data obtained from off-site survey will be used to assess the magnitude of the release and to determine which off-site areas have been affected by the release. As indicated in Section 4.2 of the Emergency Plan, CNS will deploy Field Monitoring Teams for initial off-site monitoring prior to the arrival of responding state teams. The CNS Teams will remain in the field and assist the State(s) Teams as required.

Data obtained through the off-site survey shall be utilized to determine actual release rates, deposition rates, and actual dose. Dose assessments provide a basis for decision making concerning recommendation of appropriate protective actions in accordance with EPIP 5.7.20, Protective Action Recommendations. Off-site survey data will be used in conjunction with on-site release rate determination and dose assessment capabilities to accurately determine off-site consequences of an accident condition.

This procedure describes the emergency off-site and site boundary radiological monitoring and field surveys to be undertaken in the event of an airborne release of radioactive gases from CNS. Instructions for the implementation of the program, locating sampling points, collecting samples, and performing field surveys are provided.

5.7.19 ON-SITE RADIOLOGICAL MONITORING

In the event of an accidental release involving radionuclides, data obtained from the on-site survey will be used to make initial assessments concerning the magnitude of the accident and decisions concerning evacuation of site personnel.

Principal concerns for accidental radioactive releases, particularly gaseous releases, include limiting internal dose through appropriate respiratory protection equipment, anti-contamination clothing, limiting external dose by identifying areas of high radiation, and containment of the material to prevent the spreading of contamination or release to the environs.

This procedure describes the emergency on-site radiological monitoring necessary to determine dose rates, airborne particulate, noble gas, and radioiodine activity levels due to an accidental release of radionuclides. The on-site survey entails the interior space of all station buildings.

5.7.20 PROTECTIVE ACTION RECOMMENDATIONS

Dose estimates (which population groups may potentially receive) are calculated according to the dose assessment methodology described in EPIP 5.7.17, Dose Assessment or EPIP 5.7.17.1, Dose Assessment (Manual). These dose estimates are referred to as projected dose. A protective action is an action taken to avoid or reduce a projected dose when the benefits derived from such action are sufficient to offset any undesirable features of the protective action.

This procedure provides a basis for relating actual or projected plume exposure dose to the EPA Protective Action Guides (PAGs) in order to recommend the appropriate protective actions to the county or state governments (see Sections 6.5 and 6.6).

5.7.21 MAINTAINING EMERGENCY PREPAREDNESS - EMERGENCY EXERCISES, DRILLS, TESTS AND EVALUATIONS

This procedure provides a means of ensuring the operational readiness and availability of equipment required for the immediate action steps of all four Emergency Classification action levels. This procedure also provides instructions for documenting the completion of periodic surveillances, tests, drills, and training to ensure availability, operability, and reliability.

As an emergency situation progresses, conditions may arise which require augmentation of emergency equipment. The necessary equipment will be utilized on an as-needed basis to support the emergency operations (see Section 6.5.2 of the Emergency Plan).

5.7.23 ACTIVATION OF THE JIC

This procedure describes the sequence of events and the staffing requirements for the activation of the Joint Information Center (JIC). It provides further information on the functions of the JIC and its interaction with other CNS ERF's (see Section 7.2 of the Emergency Plan) and provides responsibilities of key emergency response personnel.

5.7.24 MEDICAL EMERGENCY

As delineated in Sections 6.6.3 and 6.6.4 of the Emergency Plan, arrangements with local organizations have been made for the transportation and care of injured/contaminated personnel.

This procedure details the treatment of injured personnel during a radiological emergency. The topics addressed by the procedure are: (1) aid to contaminated and non-contaminated injured personnel on-site, and (2) transportation and treatment of injured personnel. It also provides information on local off-site facilities and the actions to be taken by off-site personnel.

5.7.25 RECOVERY OPERATIONS

This procedure describes recovery operations necessary to identify the extent of station damage and radiological contamination (if any) and return the station to an operating status in compliance with the Technical Specifications.

Recovery operations will include measures taken during and immediately following the emergency, as well as, the longer term post-emergency efforts. These operations will be performed by station and other NPPD personnel, and if required, by contract technical and labor support. Manpower and equipment resources supporting the individual functional segments of the Recovery Organization will vary according to the severity of damage and specific situational needs.

5.7.26 LONG-TERM ENVIRONMENTAL MONITORING

Methods to be used for evaluating long-term environmental consequences and analyses of trends involving key isotopes of radioactive material released from CNS are described in this procedure. Immediate collection and analysis of samples from impacted areas following a release shall be conducted in accordance with EPIP 5.7.18, Off-Site And Site Boundary Monitoring. Long-term environmental monitoring and trend analyses shall be conducted in accordance with EPIP 5.7.26. Appropriate protective measures are also discussed (also see Section 7.5.4 of the Emergency Plan).

5.7.27 ALERT AND NOTIFICATION SYSTEM

5.7.27.1 NOAA/EAS RADIO MALFUNCTION

5.7.27.2 FALSE ACTIVATION OF ALERT AND NOTIFICATION SYSTEM

The purpose of these procedures are to describe the CNS Alert And Notification System within the Plume Exposure Pathway (10-Mile EPZ) of Cooper Nuclear Station. This system was set up to meet prompt notification requirements for Cooper Nuclear Station. These procedures also include response to inadvertent siren activation or EAS radio malfunctions.

As indicated in Section 6.5 of the Emergency Plan, the CNS Early Warning System consists of fixed sirens covering areas of high population density and digitally-activated Emergency Alert System (EAS) radios in the low population density rural areas.

The fixed siren system is composed of 21 pole-mounted sirens.

Digital NOAA/EAS radio receivers are made available to residences located within the rural EPZ areas and outside the effective hearing range of the fixed sirens. These radios are pre-tuned to NOAA/EAS radio transmitter KWN41 (162.5 MHz) located at Shubert, NE. The receivers constantly monitor the broadcast frequency of the digital NOAA/EAS station, and activate upon receipt of the appropriate digital signals.

5.7.28 ADMINISTRATION OF POSITIONAL INSTRUCTION MANUALS (PIMS)

This procedure provides guidance on the revision and control of the Positional Instructional Manuals (PIMs). This procedure shall ensure proposed changes to the PIMs are properly evaluated and approved prior to implementation. This shall prevent any potential degradation to the CNS Emergency Plan and its associated Implementing Procedures.

5.7COMMUN COMMUNICATIONS

As presented in Section 7.3 of the Emergency Plan, the Emergency Response Organization has available to it various types of communications equipment which allow for effective communication to both on-site and off-site groups. This procedure provides a description of these systems and very basic instructions for their use.

5.7ENS ENS COMMUNICATOR

The procedure provides guidance to the ENS Communicator in the TSC for communicating with the NRC.

0-EP-01 EMERGENCY RESPONSE ORGANIZATION RESPONSIBILITIES

This procedure defines the responsibilities of plant personnel in support of the Emergency Response Organization at CNS and also provides a description of the responsibilities of key emergency response personnel.

0-EP-02 CONFIGURATION CONTROL OF THE AUTOMATED NOTIFICATION SYSTEM (ANS)

This procedure provides the guidance needed to maintain the Automated Notification System.

0-EN-EP-306 DRILLS AND EXERCISES

This procedure provides guidance for the planning, preparation, scheduling, conduct, evaluation, and documentation of ERO drills and exercises.

0-EN-EP-308 EMERGENCY PLANNING CRITIQUES

This procedure describes the means for tracking and correcting deficiencies identified in ERO drills and exercises.

TPP 101 EMERGENCY RESPONSE ORGANIZATION

The Emergency Response Organization Training Program provides for initial qualification, requalification training and evaluation of CNS emergency response personnel.

TPP 102 EMERGENCY PREPAREDNESS STAFF TRAINING AND QUALIFICATION

This training program procedure establishes the training and qualification requirements for the staff of the Emergency Preparedness (EP) Department at Cooper Nuclear Station.

EPDG 2 Att. H-1 CNS DRILL AND EXERCISE MANUAL - SCHEDULING

This desk guide provides guidance for the development and maintenance of the drill and exercise schedule for Cooper Nuclear Station.

EPDG 2 Att. H-2 CNS DRILL AND EXERCISE MANUAL - SCENARIO DEVELOPMENT

This desk guide provides instruction for the development of scenarios used for integrated ERO drills or exercises.

EPDG 2 Att. H-4 CNS DRILL AND EXERCISE MANUAL - DRILL AND EXERCISE PREPARATIONS

This desk guide contains the checklists needed to prepare for the drills and exercises on the drill schedule.

EPDG 2 Att. H-5 CNS DRILL AND EXERCISE MANUAL - CRITIQUE PROCESS

This desk guide describes the process for the conduct and development of a drill or exercise critique.

EPIP/EMERGENCY PLAN CROSS-REFERENCE

<u>EPIP No.</u>	<u>Emergency Plan Section</u>
5.7.1	4.1, Tables 4.1-1 through 4.1-4
5.7.2	5.1.2, 6.2, 7.2
5.7.3	6.4, 6.5, 6.6
5.7.6	6.2, 7.4
5.7.7	5.2, 7.2.1
5.7.8	5.2, 7.2.2
5.7.8.1	5.2, 7.2.2
5.7.8.2	6.4, 6.5, 6.6
5.7.9	5.2, 7.2.3
5.7.10	6.5.3
5.7.11	6.5.4
5.7.12	6.5.5, 6.6.1, 6.6.2
5.7.13	6.5.5, 6.6.1, 6.6.2
5.7.14	6.5.5.1
5.7.15	6.5.1
5.7.16	4.2, 6.3, 7.5
5.7.17	4.2, 6.3, 7.5
5.7.17.1	4.2, 6.3, 7.5
5.7.18	4.2, 6.3, 7.5
5.7.19	4.2, 6.3, 7.5
5.7.20	6.5, 6.6
5.7.21	6.5.2, 7.7, 7.8, Appendix E
5.7.23	5.3, 6.2.3, 7.2.4
5.7.24	6.6.2, 6.6.3, 6.6.4, 7.9
5.7.25	9.1, 9.2
5.7.26	7.5
5.7.27	6.5
5.7.27.1	6.5
5.7.27.2	6.5
5.7.28	None

5.7ENS	5.2.2.5
5.7COMMUN	7.3
0-EP-01	5.2
0-EP-02	6.2
0-EN-EP-306	8.2
0-EN-EP-308	8.2
TPP 101	8.1.1
TPP 102	8.1.2
EPDG 2 Att H-1	8.2
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APPENDIX B

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PLANNING STANDARDS AND EVALUATION CRITERIA

A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL)

PLANNING STANDARD

Primary responsibilities for emergency response by the nuclear facility licensee, and by State and Local Organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
1.	
a. Each plan shall identify the State, local, Federal and private sector organizations (including utilities), that are intended to be part of the overall response organization for Emergency Planning Zones (see Appendix 5).	Sections 5, 5.1, 5.2, 5.3, 5.4, 7.9.1 Appendices D, F
b. Each organization and sub-organization having an operational role shall specify its concept of operations, and its relationship to the total effort.	Section 5
c. Each plan shall illustrate these interrelationships in a block diagram.	Figures 5.2-1 through 5.2-4, 5.3-1, 5.4-1, 5.4-2
d. Each organization shall identify a specific individual by title who shall be in charge of the emergency response.	Sections 5.1.2, 5.2 Figures: 5.2-1, 5.2-2, 5.2-3, 5.2-4
e. Each organization shall provide for 24 hour per day emergency response, including 24 hour per day manning of communications links.	Sections 5.1, 5.1.2.1, 5.1.2.6, 5.2.2.5, 5.2.3.3

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
2.	
a. Each organization shall specify the functions and responsibilities for major elements and key individuals by title, of emergency response, including the following: Command and Control, Alerting and Notification, Communications, Public Information, Accident Assessment, Public Health and Sanitation, Social Services, Fire and Rescue, Traffic Control, Emergency Medical Services, Law Enforcement, Transportation, Protection Response (including authority to request Federal assistance and to initiate other protective actions), and Radiological Exposure Control. The description of these functions shall include a clear and concise summary such as a table of primary and support responsibilities using the agency as one axis, and the function as the other (see Section B for licensee).	Not Applicable to Licensee
b. Each plan shall contain (by reference to specific acts, codes or statutes) the legal basis for such authorities.	Not Applicable to Licensee
3. Each plan shall include written agreements referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones. The agreements shall identify the emergency measures to be provided and the mutually acceptable criteria for their implementation, and specify the arrangements for exchange of information. These agreements may be provided in an appendix to the plan or the plan itself may contain descriptions of these matters and a signature page in the plan may serve to verify the agreements. The signature page format is appropriate for organizations where response functions are covered by laws, regulations or executive orders where separate written agreements are not necessary.	Appendix D

EVALUATION CRITERIACROSS REFERENCE
TO PLAN

4. Each principal organization shall be capable of continuous (24-hour) operations for a protracted period. The individual in the principal organization who will be responsible for assuring continuity of resources (technical, administrative, and material) shall be specified by title.

Section 5.2.3.10

B. ON-SITE EMERGENCY ORGANIZATION

PLANNING STANDARD

On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and the interfaces among various on-site response activities and off-site support and response activities are specified.

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
1. Each licensee shall specify the on-site emergency organization of plant staff personnel for all shifts and its relation to the responsibilities and duties of the normal staff complement.	Sections 5, 5.1 Figure 5.2-1
2. Each licensee shall designate an individual as Emergency Coordinator who shall be on shift at all times and who shall have the authority and responsibility to immediately and unilaterally initiate any emergency actions, including providing protective action recommendations to authorities responsible for implementing off-site emergency measures.	Section 5.1 Figure 5.2-1
3. Each licensee shall identify a line of succession for the Emergency Coordinator position and identify the specific conditions for higher level utility officials assuming this function.	Sections 5.1.1.2, 5.1.2.1
4. Each licensee shall establish the functional responsibilities assigned to the Emergency Coordinator and shall clearly specify which responsibilities may not be delegated to other elements of the emergency organization. Among the responsibilities which may not be delegated shall be the decision to notify and to recommend protective actions to authorities responsible for off-site emergency measures.	Sections 5.1.2, 5.2, 5.2.1

EVALUATION CRITERIA	CROSS REFERENCE TO PLAN
<p>5. Each licensee shall specify the positions or title and major tasks to be performed by the persons to be assigned to the functional areas of emergency activity. For emergency situations, specific assignments shall be made for all shifts and for plant staff members, both on-site and away from the site. These assignments shall cover the emergency functions in Table B-1 entitled, "Minimum Staffing Requirements for Nuclear Power Plant Emergencies". The minimum on-shift staffing levels shall be as indicated in Table B-1. The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency. This capability shall be as indicated in Table B-1. The implementation schedule for Licensed Operators, Auxillary Operators and the Shift Technical Advisor on shift shall be as specified in the July 31, 1980, letter to all power reactor licensees. Any deficiencies in the other staff requirements of Table B-1 must be capable of augmentation within 30 minutes by September 1, 1981, and such deficiencies must be fully removed by July 1, 1982.</p>	<p>Section 5.2 Figures 5.2-1, 5.2-2, 5.2-3, 5.2-4, 5.3-1, 5.4-1</p>
<p>6. Each licensee shall specify the interfaces between and among the on-site functional areas of emergency activity, licensee headquarters support, local services support, and State and Local Government Response Organization. This shall be illustrated on a block diagram and shall include the on-site Technical Support Center and the Operational Support (assembly) Center and the licensee's near site Emergency Operations Facility (EOF).</p>	<p>Figures 5.4-1, 5.4-2</p>
<p>7. Each licensee shall specify the Corporate Management, Administrative and Technical Support personnel who will augment the plant staff as specified in the table entitled "Minimum Staffing Requirements for Nuclear Power Plant Emergencies", (Table B-1) and in the following areas:</p>	<p>Section 5.3 Figure 5.3-1</p>
<p>a. Logistics support for emergency personnel (e.g., transportation, communications, temporary quarters, food and water, sanitary facilities in the field, and special equipment and supplies procurement);</p>	<p>Section 5.2.3.10</p>

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
b. Technical support for planning and re-entry/recovery operations;	Section 9
c. Management level interface with governmental authorities; and	Sections 5.2, 5.2.3
d. Release of information to news media during an emergency (coordinated with governmental authorities).	Sections 5.3.1, 5.3.2
8. Each licensee shall specify the contractor and private organizations who may be requested to provide technical assistance to and augmentation of the emergency organization.	Section 5.3.3 Appendix D
9. Each licensee shall identify the services to be provided by local agencies for handling emergencies (e.g., police, ambulance, medical, hospital, and fire-fighting organizations shall be specified). The licensee shall provide for transportation and treatment of injured personnel who may also be contaminated. Copies of the arrangements and agreements reached with contractor, private, and local support agencies shall be appended to the plan. The agreements shall delineate the authorities, responsibilities, and limits on the actions of the contractor, private organization, and local services support groups.	Sections 5.4, 6.6.3, 7.9.1 Appendix D, F

C. EMERGENCY RESPONSE SUPPORT AND RESOURCES

PLANNING STANDARD

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and Local Staff at the licensee's near-site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

EVALUATION CRITERIACROSS REFERENCE
TO PLAN

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| <ol style="list-style-type: none"> 1. The Federal government maintains in-depth capability to assist licensees, States and local governments through the Federal Radiological Monitoring and Assessment Plan (formerly Radiological Assistance Plan (RAP) and Interagency Radiological Assistance Plan (IRAP). Each State and licensee shall make provisions for incorporating the Federal response capability into its operation plan, including the following: <ol style="list-style-type: none"> a. Specific persons by title authorized to request Federal assistance; see A.1.d., A.2.a. b. Specific Federal resources expected, including expected times of arrival at specific nuclear facility sites; and c. Specific licensee, State and Local resources available to support the Federal response (e.g., air fields, command posts, telephone lines, radio frequencies and telecommunications centers). 2. <ol style="list-style-type: none"> a. Each principal off-site organization may dispatch representatives to the licensee's near-site Emergency Operations Facility (State technical Analysis representatives at the near-site EOF are preferred). b. The licensee shall prepare for the dispatch of a representative to principal Off-Site Governmental Emergency Operations Centers. | <p>Sections 5.2.3, 7.2.3</p> <p>Figures 5.4-1, 5.4-2</p> <p>Section 7</p> <p>Not Applicable to Licensee</p> <p>N/A</p> |
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<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
3. Each organization shall identify radiological laboratories and their general capabilities and expected availability to provide radiological monitoring and analyses services which can be used in an emergency.	Sections 5.3.3.3, 7.5.7
4. Each organization shall identify nuclear and other facilities, organizations or individuals which can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement.	Section 5.3.3 Appendix D

D. EMERGENCY CLASSIFICATION SYSTEM

PLANNING STANDARD

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and Local Response Plans call for reliance on information provided by facility licensees for determinations of minimum initial off-site response measures.

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
1. An emergency classification and emergency action level scheme as set forth in Appendix 1 must be established by the licensee. The specific instruments, parameters or equipment status shall be shown for establishing each emergency class, in the in-plant Emergency Procedures. The plan shall identify the parameter values and equipment status for each emergency class.	Section 4
2. The initiating conditions shall include the example conditions found in Appendix 1 and all postulated accidents in the Final Safety Analysis Report (FSAR) for the nuclear facility.	Tables 4.1-1, 4.1-2, 4.1-3, 4.1-4
3. Each State and Local Organization shall establish an emergency classification and emergency action level scheme consistent with that established by the facility licensee.	Not Applicable to Licensee
4. Each State and Local Organization should have procedures in place that provide for emergency actions to be taken which are consistent with the emergency actions recommended by the nuclear facility licensee, taking into account local off-site conditions that exist at the time of the emergency.	Not Applicable to Licensee

E. NOTIFICATION METHODS AND PROCEDURES

PLANNING STANDARDS

Procedures have been established for notification, by the licensee of State and Local Response Organizations and for notification of emergency personnel by all response organizations; the content of initial and follow-up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone.

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
1. Each organization shall establish procedures which describe mutually agreeable bases for notification of response organizations consistent with the emergency classification and action level scheme set forth in Appendix 1. These procedures shall include means for verification. Specific details need not be included in the plan.	Sections 6.2.4, 7.4 Figure 7.4-1
2. Each organization shall establish procedures for alerting, notifying, and mobilizing emergency response personnel.	Section 6.1, 6.2, 7.4 Figure 7.4-1
3. The licensee in conjunction with State and Local Organizations shall establish the contents of the initial emergency messages to be sent from the plant. These measures shall contain information about the class of emergency, whether a release is taking place, potentially affected population and areas, and whether protective measures may be necessary.	Section 6.2.4
4. Each licensee shall make provisions for follow-up messages from the facility to off-site authorities which shall contain the following information if it is known and appropriate:	Section 6.2.4
a. Location of incident and name and telephone number (or communications channel identification) of caller;	Section 6.2.4
b. Date/time of incident;	Section 6.2.4
c. Class of emergency;	Section 6.2.4

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
d. Type of actual or projected release (airborne, waterborne, surface spill), and estimated duration/impact times;	Section 6.2.4
e. Estimate of quantity of radioactive material released or being released and the points and height of releases;	Section 6.2.4
f. Chemical and physical form of released material, including estimates of the relative quantities and concentration of noble gases, iodines, and particulates;	Section 6.2.4
g. Meteorological conditions at appropriate levels (wind speed, direction (to and from), indicator of stability, precipitation, if any);	Section 6.2.4
h. Actual or projected dose rates at site boundary; projected integrated dose at site boundary;	Section 6.2.4
i. Projected dose rates and integrated dose at the projected peak and at 2, 5, and 10 miles, including sector(s) affected;	Section 6.2.4
j. Estimate of any surface radioactive contamination in-plant, on-site or off-site;	Section 6.2.4
k. Licensee emergency response actions underway;	Section 6.2.4
l. Recommended emergency actions, including protective measures;	Section 6.2.4
m. Request for any needed on-site support by off-site organizations; and	Section 6.2.4
n. Prognosis for worsening or termination of event based on plant information.	Section 6.2.4

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
5. State and Local Government Organizations shall establish a system for disseminating to the public appropriate information contained in initial and follow-up messages received from the licensee including the appropriate notification to appropriate broadcast media (e.g., the Emergency Broadcast System (EBS)).	Not Applicable to Licensee
6. Each organization shall establish administrative and physical means, and the time required for notifying and providing prompt instructions to the public within the plume exposure pathway Emergency Planning Zone (see Appendix 3.). It shall be the licensee's responsibility to demonstrate that such means exist, regardless of who implements this requirement. It shall be the responsibility of the State and Local Governments to activate such a system.	Section 6.5
7. Each organization shall provide written messages intended for the public, consistent with the licensee's classification scheme. In particular, draft messages to the public giving instructions with regard to specific protective actions to be taken by occupants of affected areas shall be prepared and included as part of the State and Local Plans. Such messages should include the appropriate aspects of sheltering, ad hoc respiratory protection (e.g., handkerchief over mouth, thyroid blocking, or evacuation). The role of the licensee is to provide supporting information for the messages. For ad hoc respiratory protection see "Respiratory Protective Devices Manual" American Industrial Hygiene Association, 1963 pp. 123-126.	Section 6.5

F. EMERGENCY COMMUNICATIONS

PLANNING STANDARD

Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
1. The communication plans for emergencies shall include organizational titles and alternates for both ends of the communication links. Each organization shall establish reliable primary and backup means of communication for licensees, local, and State response organizations. Such systems should be selected to be compatible with one another. Each plan shall include:	
a. Provision for 24-hour per day notification to and activation of the State/local emergency response network; and at a minimum, a telephone link and alternate, including 24-hour per day manning of communications links that initiate emergency response actions;	Sections 5.1, 5.1.2.1, 5.1.2.6, 5.2.2.5, 5.2.3.3, 7.3. Table 7.1-1
b. Provision for communications with contiguous State/local governments within the Emergency Planning Zones;	Sections 6.2.4, 7.1, 7.2, 7.3
c. Provision for communications as needed with Federal emergency response organizations;	Sections 6.2.5, 7.1, 7.2, 7.3
d. Provision for communications between the nuclear facility and the licensee's near-site Emergency Operations Facility, State and Local Emergency Operations Centers, and Radiological Monitoring Teams;	Table 7.1-1
e. Provision for alerting or activating emergency personnel in each response organization; and	Sections 6.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
f. Provision for communication by the licensee with NRC headquarters and NRC Regional Office Emergency Operations Centers and the licensee's near-site Emergency Operations Facility and Radiological Monitoring Team assembly area.	Sections 6.2.5, 7.1, 7.2, 7.3 Table 7.1-1
2. Each organization shall ensure that a coordinated communication link for fixed and mobile medical support facilities exists.	Sections 6.6.3, 6.6.4
3. Each organization shall conduct periodic testing of the entire Emergency Communications System (see Evaluation Criteria H.10, 2.a and Appendix 3).	Section 8.2.2.5

G. PUBLIC EDUCATION AND INFORMATION

PLANNING STANDARD

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

EVALUATION CRITERIACROSS REFERENCE
TO PLAN

1. Each organization shall provide a coordinated periodic (at least annually) dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency. This information shall include, but not necessarily be limited to:
 - a. Educational information on radiation;
 - b. Contact for additional information;
 - c. Protective measures (e.g., evacuation routes and relocation centers, sheltering, respiratory protection, radio-protective drugs); and
 - d. Special needs of the handicapped.

Section 8.1.4

Means for accomplishing this dissemination may include, but are not necessarily limited to: information in the telephone book; periodic information in utility bills; posting in public areas; and publications distributed on an annual basis.

EVALUATION CRITERIACROSS REFERENCE
TO PLAN

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| <p>2. The public information program shall provide the permanent and transient adult population within the plume exposure EPZ an adequate opportunity to become aware of the information annually. The programs should include provision for written material that is likely to be available in a residence during an emergency. Updated information shall be disseminated at least annually. Signs or other measures (e.g., decals, posted notices or other means, placed in hotels, motels, gasoline stations and phone booths) shall also be used to disseminate to any transient population within the plume exposure pathway EPZ appropriate information that would be helpful if an emergency or accident occurs. Such notices should refer the transient to the telephone directory or other source of local emergency information and guide the visitor to appropriate radio and television frequencies.</p> | <p>Section 8.1.4</p> |
| <p>3.</p> | |
| <p>a. Each principal organization shall designate the points of contact and physical locations for use by news media during an emergency.</p> | <p>Sections 5.3.1, 7.2.4, 8.1.5
Figure 7.2-4</p> |
| <p>b. Each licensee shall provide space which may be used for a limited number of the news media at the near-site Emergency Operations Facility.</p> | <p>Section 7.2.4
Figure 7.2-4</p> |
| <p>4.</p> | |
| <p>a. Each principal organization shall designate a spokesperson who should have access to all necessary information.</p> | <p>Sections 5.3.2, 7.2.4</p> |
| <p>b. Each organization shall establish arrangements for timely exchange of information among designated spokespersons.</p> | <p>Sections 5.3.2, 7.2.4</p> |
| <p>c. Each organization shall establish coordinated arrangements for dealing with rumors.</p> | <p>Section 5.3.1, 5.3.1.3, 7.2.4</p> |

EVALUATION CRITERIACROSS REFERENCE
TO PLAN

5. Each organization shall conduct coordinated programs at least annually to acquaint news media with the emergency plans, information concerning radiation, and points of contact for release of public information in an emergency.

Section 8.1.5

H EMERGENCY FACILITIES AND EQUIPMENT

PLANNING STANDARD

Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
1. Each licensee shall establish a Technical Support Center and an On-Site Operations Support Center (assembly area) in accordance with NUREG-0696, Revision 1.	Sections 7.2.1, 7.2.2 Figures 7.2-1, 7.2-2
2. Each licensee shall establish an Emergency Operations Facility from which evaluation and coordination of all licensee activities related to an emergency is to be carried out and from which the licensee shall provide information to Federal, State, and local authorities responding to radiological emergencies in accordance with NUREG-0696, Revision 1.	Section 7.2.3 Figures 7.2-3
3. Each organization shall establish an Emergency Operations Center for use in directing and controlling response functions.	Not Applicable to Licensee
4. Each organization shall provide for timely activation and staffing of the facilities and centers described in the plan.	Section 6.2
5. Each licensee shall identify and establish on-site monitoring systems that are to be used to initiate emergency measures in accordance with Appendix 1, as well as those to be used for conducting assessment. The equipment shall include:	Section 7.5
a. Geophysical phenomena monitors (e.g., meteorological, hydrologic, seismic);	Sections 7.5.1, 7.5.2, 7.5.3
b. Radiological monitors (e.g., process, area, emergency, effluent, wound and portable monitors and sampling equipment);	Section 7.5.4, 7.5.5

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
c. Process monitors (e.g., Reactor Coolant System pressure and temperature, containment pressure and temperature, liquid levels, flow rates, status or lineup of equipment components); and	Section 7.5.5.6
d. Fire and combustion products detectors.	Section 7.6
6. Each licensee shall make provision to acquire data from or for emergency access to off-site monitoring and analysis equipment including:	
a. Geophysical phenomena monitors (e.g., meteorological, hydrologic, seismic);	Sections 7.5, 7.5.1, 7.5.2, 7.5.3
b. Radiological monitors including ratemeters and sampling devices. Dosimetry shall be provided and shall meet, as a minimum, the NRC Radiological Assessment Branch Technical Position for the Environmental Radiological Monitoring Program; and	Section 7.5.4
c. Laboratory facilities, fixed or mobile.	Section 7.5.7
7. Each organization, where appropriate, shall provide for off-site radiological monitoring equipment in the vicinity of the nuclear facility.	Section 7.5.6
8. Each licensee shall provide meteorological instrumentation and procedures which satisfy the criteria in Appendix 2, and provisions to obtain representative current meteorological information from other sources.	Section 7.5.2
9. Each licensee shall provide for an On-Site Operations Support Center (assembly area) which shall have adequate capability, and supplies, including, for example, respiratory protection, protective clothing, portable lighting, portable radiation monitoring equipment, cameras, and communications equipment for personnel present in the assembly area.	Section 7.2.2

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
10. Each organization shall make provisions to inspect, inventory and operationally check emergency equipment/instruments at least once each calendar quarter and after each use. There shall be sufficient reserves of instruments/equipment to replace those which are removed from emergency kits for calibration or repair. Calibration of equipment shall be at intervals recommended by the supplier of the equipment.	Sections 7.7, 8.6 Appendix E
11. Each plan shall, in an appendix, include identification of emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment, and emergency supplies).	Table 7.1-1 Appendix E
12. Each organization shall establish a central point (preferably associated with the licensee's near-site Emergency Operations Facility), for the receipt and analysis of all field monitoring data and coordination of sample media.	Section 7.2.3

I. ACCIDENT ASSESSMENT

PLANNING STANDARD

Adequate methods, systems, and equipment for assessing and monitoring actual or potential off-site consequences of a radiological emergency condition are in use.

EVALUATION CRITERIACROSS REFERENCE
TO PLAN

- | | |
|--|--|
| <p>1. Each licensee shall identify plant system and effluent parameter values characteristic of a spectrum of off-normal conditions and accidents, and shall identify the plant parameter values or other information which correspond to the example initiating conditions of Appendix 1. Such parameter values and the corresponding emergency class shall be included in the appropriate Facility Emergency Procedures. Facility Emergency Procedures shall specify the kinds of instruments being used and their capabilities.</p> | <p>Tables 4.1-1, 4.1-2, 4.1-3, 4.1-4</p> |
| <p>2. On-site capability and resources to provide initial values and continuing assessment throughout the course of an accident shall include post-accident sampling capability, radiation and effluent monitors, in-plant iodine instrumentation, and containment radiation monitoring in accordance with NUREG-0578, as elaborated in the NRC letter to all power reactor licensees dated October 30, 1979.</p> | <p>Sections 4.2, 6.3, 7.5</p> |
| <p>3. Each licensee shall establish methods and techniques to be used for determining:</p> | |
| <p>a. The source term of releases of radioactive material within plant systems. An example is the relationship between the containment radiation monitor(s) reading(s) and radioactive material available for release from containment.</p> | <p>Sections 6.3.3, 7.5</p> |
| <p>b. The magnitude of the release of radioactive materials based on plant system parameters and effluent monitors.</p> | <p>Sections 6.3.3, 7.5</p> |

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
4. Each licensee shall establish the relationship between effluent monitor readings and on-site and off-site exposures and contamination for various meteorological conditions.	Sections 6.3.3, 7.5
5. Each licensee shall have the capability of acquiring and evaluating meteorological information sufficient to meet the criteria of Appendix 2. There shall be provisions for access to meteorological information by at least the near-site Emergency Operations Facility, the Technical Support Center, the Control Room, and an off-site NRC Center. The licensee shall make available to the State suitable meteorological data processing interconnections which will permit independent analysis by the State, of facility-generated data in those States with the resources to effectively use this information.	Sections 6.3.2, 7.5
6. Each licensee shall establish the methodology for determining the release rate/projected doses if the instrumentation used for assessment are off-scale or inoperable.	Sections 4.2, 6.3.3
7. Each organization shall describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone which are an intrinsic part of the concept of operations for the facility.	Sections 4.2, 6.3
8. Each organization, where appropriate, shall provide methods, equipment, and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways. This shall include activation, notification means, field team composition, transportation, communication, monitoring equipment and estimated deployment times.	Sections 4.2, 6.3, 7.5 Table 6.3-1

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
9. Each organization shall have a capability to detect and measure radioiodine concentrations in air in the plume exposure EPZ as low as 10^{-7} $\mu\text{Ci/cc}$ (microcuries per cubic centimeter) under field conditions. Interference from the presence of noble gas and background radiation shall not decrease the stated minimum detectable activity.	Sections 6.3.3, 7.5.5.5
10. Each organization shall establish means for relating the various measured parameters (e.g., contamination levels, water and air activity levels) to dose rates for key isotopes (i.e., those given in Table 3, Page 18) and gross radioactivity measurements. Provisions shall be made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides. The detailed provisions shall be described in separate procedures.	Sections 6.3.3, 6.5 Tables 6.3-1, 6.4-1
11. Arrangements to locate and track the airborne radioactive plume shall be made, using either or both Federal and State resources.	Not Applicable to Licensee

J. PROTECTIVE RESPONSE

PLANNING STANDARD

A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
<ol style="list-style-type: none"> 1. Each licensee shall establish the means and time required to warn or advise on-site individuals and individuals who may be in areas controlled by the Operator, including: <ol style="list-style-type: none"> a. Employees not having emergency assignments; b. Visitors; c. Contractor and construction personnel; and d. Other persons who may be in the public access areas on or passing through the site or within the owner-controlled area. 	Sections 6.1, 6.5
<ol style="list-style-type: none"> 2. Each licensee shall make provisions for evacuation routes and transportation for on-site individuals to some suitable off-site location, including alternatives for inclement weather, high traffic density and specific radiological conditions. 	Section 6.5.4
<ol style="list-style-type: none"> 3. Each licensee shall provide for radiological monitoring of people evacuated from the site. 	Section 6.6.2
<ol style="list-style-type: none"> 4. Each licensee shall provide for the evacuation of on-site non-essential personnel in the event of a Site or General Emergency and shall provide a decontamination capability at or near the monitoring point specified in J.3. 	Section 6.5.4

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
5. Each licensee shall provide for a capability to account for all individuals on-site at the time of the emergency and ascertain the names of missing individuals within 30 minutes of the start of an emergency and account for all on-site individuals continuously thereafter.	Section 6.5.3
6. Each licensee shall, for individuals remaining or arriving on-site during the emergency, make provisions for: a. Individual respiratory protection; b. Use of protective clothing; and c. Use of radioprotective drugs (e.g., individual thyroid protection).	Sections 6.5.2, 6.5.5.1
7. Each licensee shall establish a mechanism for recommending protective actions to the appropriate State and Local Authorities. These shall include Emergency Action Levels corresponding to projected dose to the population-at-risk, in accordance with Appendix 1 and with the recommendations set forth in Tables 2.1 and 2.2 of the Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (EPA400-R-92-001). As specified in Appendix 1, prompt notification shall be made directly to the off-site authorities responsible for implementing protective measures within the plume exposure pathway Emergency Planning Zone.	Section 6.5 Table 6.4-1
8. Each licensee's plan shall contain time estimates for evacuation within the plume exposure EPZ. These shall be in accordance with Appendix 4.	Appendix C

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
9. Each State and Local Organization shall establish a capability for implementing protective measures based upon protective action guides and other criteria. This shall be consistent with the recommendations of EPA regarding exposure resulting from passage of radioactive airborne plumes (EPA-400-R-92-001) and with those of DHEW (DHHS)/FDA regarding radioactive contamination of human food and animal feeds as published in the Federal Register of December 15, 1978 (43 FR 58790).	Not Applicable to Licensee
10. The organization's plans to implement protective measures for the plume exposure pathway shall include:	
a. Maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas (identification of radiological sampling and monitoring points shall include the designators in Table J-1 or an equivalent uniform system described in the plan);	Appendix C
b. Maps showing population distribution around the nuclear facility. This shall be by evacuation areas (licensees shall also present the information in a sector format);	Appendix C
c. Means for notifying all segments of the transient and resident population;	Section 6.5
d. Means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement;	Not Applicable to Licensee
e. Provisions for the use of radio-protective drugs, particularly for emergency workers and institutionalized persons within the plume exposure EPZ whose immediate evacuation may be infeasible or very difficult, including quantities, storage, and means of distribution.	Not Applicable to Licensee

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
f. State and Local Organizations' Plans should include the method by which decisions by the State Health Department for administering radio-protective drugs to the general population are made during an emergency and the pre-determined conditions under which such drugs may be used by off-site emergency workers; ¹	Not Applicable to Licensee
¹ See DHEW (now DHHS) Federal Register notice of December 15, 1978 (43 FR 58798) entitled "Potassium Iodide as a Thyroid Blocking Agent in a Radiation Emergency." Other guidance concerning the storage, stockpiling, and conditions for use of this drug by the general public, is now under development by the Bureau of Drugs, DHHS.	
g. Means of relocation;	Not Applicable to Licensee
h. Relocation centers in host areas which are at least 5 miles and preferably 10 miles, beyond the boundaries of the plume exposure emergency planning zone (see K.8);	Not Applicable to Licensee
i. Projected traffic capacities of evacuation routes under emergency conditions;	Not Applicable to Licensee
j. Control of access to evacuated areas and organization responsibilities for such control;	Not Applicable to Licensee
k. Identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes and contingency measures;	Not Applicable to Licensee
l. Time estimates for evacuation of various sectors and distances based on a dynamic analysis (time-motion study under various conditions) for the plume exposure pathway emergency planning zone (see Appendix 4); and	Not Applicable to Licensee

EVALUATION CRITERIA	CROSS REFERENCE TO PLAN
m. The bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions. This shall include expected local protection afforded ² in residential units or other shelter for direct and inhalation exposure, as well as evacuation time estimates.	Section 6.5 Tables 6.4-1, 6.4-2
² The following reports may be considered in determining protection afforded.	
(1) "Public Protection Strategies for Potential Nuclear Reactor Accidents Sheltering Concepts with Existing Public and Private Structures" (SAND 771725), Sandia Laboratory.	
(2) "Examination of Off-Site Radiological Emergency Measures for Nuclear Reactor Accidents Involving Core Melt" (SAND 780454), Sandia Laboratory.	
(3) "Protective Action Evaluation Part II, Evacuation and Sheltering as Protective Actions Against Nuclear Accidents Involving Gaseous Releases" (EPA 520/178001B U.S. Environmental Protection Agency.	
11. Each State shall specify the protective measures to be used for the ingestion pathway, including the methods for protecting the public from consumption of contaminated foodstuffs. This shall include criteria for deciding whether dairy animals should be put on stored feed. The plan shall identify procedures for detecting contamination, for estimating the dose commitment consequences of uncontrolled ingestion, and for imposing protection procedures such as impoundment, decontamination, processing, decay, product diversion, and preservation. Maps for recording survey and monitoring key land use data (e.g., farming), dairies, food processing plants, water sheds, water supply intake, and treatment plants and reservoirs shall be maintained. Provisions for maps showing detailed crop information may be by including reference to their availability and location and a plan for their use. The maps shall start at the facility and include all of the 50-mile ingestion pathway EPZ. Up-to-date lists of the name and location of all facilities which regularly process milk products and other large amounts of food or agricultural products originating in the ingestion pathway Emergency Planning Zone, but located elsewhere, shall be maintained.	Not Applicable to Licensee

EVALUATION CRITERIACROSS REFERENCE
TO PLAN

12. Each organization shall describe the means for registering and monitoring of evacuees at relocation centers in host areas. The personnel and equipment available should be capable of monitoring within about a 12-hour period all residents and transients in the plume exposure EPZ arriving at relocation centers.

Not Applicable to Licensee

K. RADIOLOGICAL EXPOSURE CONTROL

PLANNING STANDARD

Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

EVALUATION CRITERIACROSS REFERENCE
TO PLAN

1. Each licensee shall establish on-site exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Actions Guides (EPA 400-R-92-001) for:
 - a. Removal of injured persons;
 - b. Undertaking corrective actions;
 - c. Performing assessment actions;
 - d. Providing first aid;
 - e. Performing personnel decontamination;
 - f. Providing ambulance service; and
 - g. Providing medical treatment services.
2. Each licensee shall provide an on-site radiation protection program to be implemented during emergencies, including methods to implement exposure guidelines. The plan shall identify individual(s), by position or title, who can authorize emergency workers to receive doses in excess of 10CFR Part 20 limits. Procedures shall be worked out in advance for permitting on-site volunteers to receive radiation exposures in the course of carrying out lifesaving and other emergency activities. These procedures shall include expeditious decision making and a reasonable consideration of relative risks.

Section 6.6.1
Table 6.4-1

Section 6.6.1

<u>EVALUATION CRITERIA</u>	CROSS REFERENCE TO PLAN
3.	
a. Each organization shall make provision for 24-hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear accident, including volunteers. Each organization shall make provisions for distribution of dosimeters, both self-reading and permanent record devices.	Section 6.6.1
b. Each organization shall ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in any nuclear accident.	Section 6.6.1
4. Each State and Local Organization shall establish the decision chain for authorizing emergency workers to incur exposures in excess of the EPA General Public Protective Action Guides (i.e., EPA PAGs for emergency workers and lifesaving activities).	Not Applicable to Licensee
5.	
a. Each organization, as appropriate, shall specify action levels for determining the need for decontamination.	Section 6.5.5.1
b. Each organization, as appropriate, shall establish the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal.	Sections 6.6.2, 6.6.3, 6.6.4
6. Each licensee shall provide on-site contamination control measures including:	Sections 6.5.5.1, 6.5.5.2
a. Area access control;	
b. Drinking water and food supplies;	
c. Criteria for permitting return of areas and items to normal use (see Draft ANSI 13.12).	

EVALUATION CRITERIACROSS REFERENCE
TO PLAN

7. Each licensee shall provide the capability for decontaminating relocated on-site personnel, including provisions for extra clothing and decontaminants suitable for the type of contamination expected, with particular attention given to radioiodine contamination of the skin.

Sections 6.5.4, 6.6.2
Appendix E

L. MEDICAL AND PUBLIC HEALTH SUPPORT

PLANNING STANDARD

Arrangements are made for medical services for contaminated injured individuals.¹

- ¹ The availability of an Integrated Emergency Medical Services System and a public health emergency plan serving the area in which the facility is located and, as a minimum, equivalent to the Public Health Service Guide for Developing Health Disaster Plans, 1974, and to the requirements of an Emergency Medical Services System as outlined in the Emergency Medical Services System Act of 1973 (P.L. 93154 and amendments in 1979 P.L. 96142), should be a part of and consistent with overall State or local disaster control plans and should be compatible with the specific overall emergency response plan for the facility.

EVALUATION CRITERIACROSS REFERENCE
TO PLAN

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|---|----------------------------|
| 1. Each organization shall arrange for local and backup hospital and medical services having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals. | Section 6.6.4 |
| 2. Each licensee shall provide for on-site first aid capability. | Section 6.6.2 |
| 3. Each State shall develop lists indicating the location of public, private, and military hospitals, and other emergency medical services facilities within the State of contiguous States considered capable of providing medical support for any contaminated injured individual. The listing shall include the name, location, type of facility, and capacity and any special radiological capabilities. These emergency medical services should be able to radiologically monitor contaminated personnel, and have facilities and trained personnel able to care for contaminated injured persons. | Not Applicable to Licensee |
| 4. Each organization shall arrange for transporting victims of radiological accidents to medical support facilities. | Section 6.6.3 |

M. RECOVERY AND RE-ENTRY PLANNING AND POST-ACCIDENT OPERATIONS

PLANNING STANDARD

General Plans for recovery and re-entry are developed.

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
1. Each organization, as appropriate, shall develop general plans and procedures for re-entry and recovery, and describe the means by which decisions to relax protective measures (e.g., allow re-entry into an evacuated area) are reached. This process should consider both existing and potential conditions.	Sections 9, 9.1, 9.2
2. Each licensee plan shall contain the position/title, authority and responsibilities of individuals who will fill key positions in the facility recovery organization. This organization shall include technical personnel with responsibilities to develop, evaluate, and direct recovery and re-entry operations. The recovery organization recommended by the Atomic Industrial Forum's "Nuclear Power Plant Emergency Response Plan" dated October 11, 1979, is an acceptable framework.	Sections 9, 9.1, 9.2
3. Each licensee and State plan shall specify means for informing members of the response organizations that a recovery operation is to be initiated, and of any changes in the organizational structure that may occur.	Section 9.2
4. Each plan shall establish a method for periodically estimating total population exposure.	Section 9.3

N. EXERCISES AND DRILLS (*1)

PLANNING STANDARD

Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

EVALUATION CRITERIACROSS REFERENCE
TO PLAN

1.

- a. An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. The emergency preparedness exercise shall simulate an emergency that results in off-site radiological releases which would require response by off-site authorities. Exercises shall be conducted as set forth in NRC and FEMA rules.

Sections 8.2, 8.2.1

- b. An exercise shall include mobilization of State and Local Personnel and Resources adequate to verify the capability to respond to an accident scenario requiring response. The organization shall provide for a critique of the annual exercise by Federal and State Observers/Evaluators. The scenario should be varied from year to year such that all major elements of the plans and preparedness organizations are tested within a five year period. Each organization should make provisions to start an exercise between 6:00 p.m. and midnight, and another between midnight and 6:00 a.m. once every six years. Exercises should be conducted under various weather conditions. Some exercises should be unannounced.

Sections 8.2, 8.2.1

Notes:

*1 - As supplemented by "Interim Staff Guidance - Emergency Planning for Nuclear Power Plants," NSIR/DPR-ISG-01, Rev. 0, November 2011.

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
2. A drill is a supervised instruction period aimed at testing, developing and maintaining skills in a particular operation. A drill is often a component of an exercise. A drill shall be supervised and evaluated by a qualified drill instructor. Each organization shall conduct drills in addition to the annual exercise at the frequencies indicated below:	Sections 8.2, 8.2.2
a. COMMUNICATION DRILLS	
Communications with State and Local Governments within the plume exposure pathway Emergency Planning Zone shall be tested monthly. Communications with Federal Emergency Response Organizations and States within the ingestion pathway shall be tested quarterly. Communications between the nuclear facility, State and Local Emergency Operations Centers, and Field Assessment Teams shall be tested annually. Communication drills shall also include the aspect of understanding the content of messages.	Section 8.2.2.5
b. FIRE DRILLS	
Fire drills shall be conducted in accordance with the plant (nuclear facility) technical specifications.	Section 8.2.2.1
c. MEDICAL EMERGENCY DRILLS	
A medical emergency drill involving a simulated contaminated individual which contains provisions for participation by the local support services agencies (i.e., ambulance and off-site medical treatment facility) shall be conducted annually. The off-site portions of the medical drill may be performed as part of the required annual exercise.	Section 8.2.2.2

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
d. RADIOLOGICAL MONITORING DRILLS	
<p>Plant environs and radiological monitoring drills (on-site and off-site) shall be conducted annually. These drills shall include collection and analysis of all sample media (e.g., water, vegetation, soil, and air), and provisions for communications and record keeping. The State drills need not be at each site. Where appropriate, local organizations shall participate.</p>	Section 8.2.2.3
e. HEALTH PHYSICS DRILLS	
<p>(1) Health Physics drills shall be conducted semiannually which involve response to, and analysis of, simulated elevated airborne and liquid samples and direct radiation measurements in the environment. The State drills need not be at each site.</p>	Section 8.2.2.4
<p>(2) Analysis of in-plant liquid samples with actual elevated radiation levels including use of the Post-Accident Sampling System shall be included in Health Physics drills by licensees annually.</p>	
<p>3. Each organization shall describe how exercises and drills are to be carried out to allow free play for decision making and to meet the following objectives. Pending the development of exercise scenarios and exercise evaluation guidance by NRC and FEMA the scenarios for use in exercises and drills shall include, but not be limited to, the following:</p>	
<p>a. The basic objective(s) of each drill and exercise and appropriate evaluation criteria;</p>	Sections 8.2.1, 8.2.2
<p>b. The date(s), time period, place(s) and participating organizations;</p>	Section 8.2.1
<p>c. The simulated events;</p>	Section 8.2.1

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
d. A time schedule of real and simulated Initiating events;	Section 8.2.1
e. A narrative summary describing the conduct of the exercises or drills to include such things as simulated casualties, off-site fire department assistance, rescue of personnel, use of protective clothing, deployment of Radiological Monitoring Teams, and public information activities; and	Section 8.2.1
f. A description of the arrangements for and advance materials to be provided to official observers.	Section 8.2.1
4. Official observers from Federal, State or Local Governments will observe, evaluate and critique the required exercises. A critique shall be scheduled at the conclusion of the exercise to evaluate the ability of organizations to respond as called for in the plan. The critique shall be conducted as soon as practicable after the exercise, and a formal evaluation should result from the critique.	Section 8.2.1
5. Each organization shall establish means for evaluating observer and participant comments on areas needing improvement, including emergency plan procedural changes, and for assigning responsibility for implementing corrective actions. Each organization shall establish management control used to ensure that corrective actions are implemented.	Section 8.2.1

O. RADIOLOGICAL EMERGENCY RESPONSE TRAINING

PLANNING STANDARD

Radiological emergency response training is provided to those who may be called on to assist in an emergency.

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
1. Each organization shall assure the training of appropriate individuals.	Sections 8.1, 8.1.1
a. Each facility to which the plant applies shall provide site specific emergency response training for those off-site emergency organizations who may be called upon to provide assistance in the event of an emergency. ¹	Section 8.1.3
¹ Training for hospital personnel, ambulance/rescue, police, and fire departments shall include the procedures for notification, basic radiation protection, and their expected roles. For those local services support organizations who will enter the site, training shall also include site access procedures and the identity (by position and title) of the individual in the on-site emergency organization who will control the organizations' support activities. Off-site emergency response support personnel should be provided with appropriate identification cards where required.	
b. Each off-site response organization shall participate in and receive training. Where mutual aid agreements exist between local agencies such as fire, police, and ambulance/rescue, the training shall also be offered to the other departments who are members of the mutual aid district.	Not Applicable to Licensee
2. The training program for members of the on-site emergency organization shall, besides classroom training, include practical drills in which each individual demonstrates ability to perform his assigned emergency function. During the practical drills, on-the-spot correction of erroneous performance shall be made and a demonstration of the proper performance offered by the instructor.	Sections 8.1.1, 8.1.2
3. Training for individuals assigned to licensee First Aid Teams shall include courses equivalent to Red Cross Multi-Media.	Section 8.1.1

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
<p>4. Each organization shall establish a training program for instructing and qualifying personnel who will implement radiological emergency response plans.² The specialized initial training and periodic retraining programs (including the scope, nature and frequency) shall be provided in the following categories:</p> <p>² If State and Local Governments lack the capability and resources to accomplish this training, they may look to the licensee and the Federal government (FEMA) for assistance in this training.</p> <p>* NRC and FEMA encourage State and Local Governments which have these capabilities to continue to include them in their training programs.</p>	
a. Directors or coordinators of the response organizations;	Section 8.1.1
b. Personnel responsible for accident assessment;	Section 8.1.1
c. Radiological Monitoring Teams and Radiological Analysis personnel;	Section 8.1.1
d. Police, Security, and Fire-fighting personnel;	Sections 8.1.1, 8.1.3
e. Repair and damage control/correctional action teams (on-site);	Section 8.1.1
f. First aid and rescue personnel;	Section 8.1.1
g. Local support services personnel including Civil Defense/Emergency Service personnel;	Section 8.1.3
h. Medical support personnel;	Sections 8.1.1, 8.1.3
i. Licensee's headquarters support personnel;	Section 8.1.1
j. Personnel responsible for transmission of emergency information and instructions.	Section 8.1.1
<p>5. Each organization shall provide for the initial and annual retraining of personnel with emergency response responsibilities.</p>	Section 8.1.1

P. RESPONSIBILITY FOR THE PLANNING EFFORT: DEVELOPMENT, PERIODIC REVIEW AND DISTRIBUTION OF EMERGENCY PLANS

PLANNING STANDARD

Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.

<u>EVALUATION CRITERIA</u>	<u>CROSS REFERENCE TO PLAN</u>
1. Each organization shall provide for the training of individuals responsible for the planning effort.	Section 8.1.2
2. Each organization shall identify by title the individual with the overall authority and responsibility for radiological emergency response planning.	Section Introduction, 8.3
3. Each organization shall designate an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations.	Section 8.3
4. Each organization shall update its plan and agreements, as needed, review and certify it to be current on an annual basis. The update shall take into account changes identified by drills and exercises.	Section 8.5
5. The emergency response plans and approved changes to the plans shall be forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. Revised pages shall be dated and marked to show where changes have been made.	Section 8.5
6. Each plan shall contain a detailed listing of supporting plans and their source.	Section 2 Appendix F
7. Each plan shall contain as an appendix listing, by title, procedures required to implement this plan. The listing shall include the section(s) of the plan to be implemented by each procedure.	Appendix A

<u>EVALUATION CRITERIA</u>	CROSS REFERENCE TO PLAN
8. Each plan shall contain a specific table of contents. Plans submitted for review should be cross referenced to these criteria.	Table of Contents Appendix B
9. Each licensee shall arrange for and conduct independent reviews of the emergency preparedness program at least every 12 months. (An independent review is one conducted by any competent organization either internal or external to the licensee's organization, but who are not immediately responsible for the emergency preparedness program.) The review shall include the emergency plan, its implementing procedures and practices, training, readiness testing, equipment, and interfaces with State and Local Governments. Management controls shall be implemented for evaluation and correction of review findings. The results of the review, along with recommendations for improvements, shall be documented, reported to appropriate licensee corporate and plant management, and involved Federal, State, and Local organizations, and retained for a period of five years.	Section 8.5
10. Each organization shall provide for updating telephone numbers in Emergency Procedures at least quarterly.	Section 8.5

CROSS-REFERENCE

<u>10CFR50.47</u>	<u>NUREG-0654, Rev. 1 (FEMA REP 1) - Planning Standards</u>
b.1	A Assignment of Responsibility (Organization Control)
b.2	B On-Site Emergency Organization
b.3	C Emergency Response Support and Resources
b.4	D Emergency Classification System
b.5	E Notification Methods and Procedures
b.6	F Emergency Communications
b.7	G Public Education and Information
b.8	H Emergency Facility and Equipment
b.9	I Accident Assessment
b.10	J Protective Response
b.11	K Radiological Exposure Control
b.12	L Medical and Public Health Support
b.13	M Recovery and Re-Entry Planning and Post-Accident Operations
b.14	N Exercises and Drills
b.15	O Radiological Emergency Response Training
b.16	P Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans

10CFR50.47.b contains sixteen standards to be met by a licensee's Emergency Plan.

NUREG-0654/FEMA-REP-1 Rev. 1, contains sixteen planning standards which must be addressed in the licensee's Emergency Plan. The NUREG-0654, Rev. 1 (FEMA REP 1) Planning Standards are word for word duplications of the standards found in 10CFR50.47.b.

The cross-reference between NUREG-0654, Rev. 1 (FEMA REP 1), and the NPPD Emergency Plan found in Appendix B of the NPPD Emergency Plan adequately provides a cross-reference to the standards in 10CFR50.47.b.

CROSS REFERENCE 10CFR50 APPENDIX E TO CNS EMERGENCY PLAN

10CFR50, Appendix E.IV	NUREG-0654, Rev. 1 (FEMA REP 1)	NPPD Emergency Plan Section
A.1	A.1.b, c	5, 5.1
A.2a	A.1.d, B.2, 3	5.1, 5.2
A.2b	B.5	5.2
A.2c	B.2, 3	5.2
A.3	B.7	5.3
A.4	B.5 I	5.2 4.2, 6.2.4, 6.2.5, 6.3, 6.5
A.5	B.8	5.3, Appendix D
A.6	B.9	5.4 6.5, 6.6, Appendices D, F
A.7	C	5.4.1, 5.4.2, 5.4.3, 5.4.4, 6.4 6.5, 6.6, Appendices D, F
A.8	J.9	6.2.4, 6.5, 6.6, Appendix D
A.9	N/A	5.1, Figure 5.2-1
B.1	D, I, J	4, 6.3, 7.5, 8.1.3
C.1	D	4, 6.7.4
C.2	D	4
D.1	E	5.4, 6, 6.2.4, 6.2.5, 6.5 Appendix D
D.2	G.1, 2	8.1.4
D.3	E	6.2.4, 6.5, Table 4.1-5, Table 4.1-6, Table 4.1-7, Table 4.1-8
E.1	K.3a, b	6.5.5.1, 6.6.1, 7.2, Appendix E
E.2	H.6, 7, 8, I	4, 7.5, 7.7
E.3	K.5, 6, 7	6.5, 6.6
E.4	L	6.6
E.5	L	6.6, Appendix D
E.6	L	6.6.3, 6.6.4, Appendix D
E.7	L	6.6.3, 6.6.4, Appendix D

CROSS REFERENCE 10CFR50 APPENDIX E TO CNS EMERGENCY PLAN

10CFR50, Appendix E.IV	NUREG-0654, Rev. 1 (FEMA REP 1)	NPPD Emergency Plan Section
E.8	H.1, 2	6.5, 7.2.1, 7.2.2, 7.2.3
E.9	F	7, 7.3, 8.2
F	N, O	8.1, 8.2, 8.4
G	P.2, 3	8.3, 8.4, 8.5, 8.6
H	M	9
I	N/A	6.5

CROSS REFERENCE
NEI 99-01, Revision 5 TO EAL NUMBER
FOR NOTIFICATION OF UNUSUAL EVENT CONDITIONS

NEI 99-01, Rev 5 INITIATING CONDITION	COOPER NUCLEAR STATION EMERGENCY ACTION LEVEL NUMBER
AU1, Example 1	AU1.1
AU1, Example 2	AU1.2
AU1, Example 3	AU1.3
AU1, Example 4	Not Applicable
AU1, Example 5	Not Applicable
AU2, Example 1	AU2.1
AU2, Example 2	AU2.2
CU1, Example 1	CU2.1
CU2, Example 1	CU2.2
CU2, Example 2	CU2.3
CU3, Example 1	CU1.1
CU4, Example 1	CU3.1
CU4, Example 2	CU3.2
CU6, Examples 1, 2	CU4.1
CU7, Example 1	CU6.1
CU8, Example 1	CU5.1
CU8, Example 2	Not Applicable
FU1, Example 1	FU1.1
HU1, Example 1	HU1.1
HU1, Example 2	HU1.2
HU1, Example 3	HU1.4
HU1, Example 4	HU1.3
HU1, Example 5	HU1.5
HU2, Example 1	HU2.1
HU2, Example 2	HU2.2
HU3, Example 1	HU3.1
HU3, Example 2	HU3.2
HU4, Examples 1, 2, 3	HU4.1

CROSS REFERENCE
NEI 99-01, Revision 5 TO EAL NUMBER
FOR NOTIFICATION OF UNUSUAL EVENT CONDITIONS

NEI 99-01, Rev 5 INITIATING CONDITION	COOPER NUCLEAR STATION EMERGENCY ACTION LEVEL NUMBER
HU5, Example 1	HU6.1
SU1, Example 1	SU1.1
SU2, Example 1	SU3.1
SU3, Example 1	SU4.1
SU4, Example 1	SU5.1
SU4, Example 2	SU5.2
SU5, Examples 1, 2	SU6.1
SU6, Examples 1, 2	SU8.1
SU8, Example 1	SU2.1
SU8, Example 2	Not Applicable
E-HU1, Example 1	EU1.1

CROSS REFERENCE
NEI 99-01, Revision 5 TO EAL NUMBER
FOR ALERT CONDITIONS

NEI 99-01, Rev 5 INITIATING CONDITION	COOPER NUCLEAR STATION EMERGENCY ACTION LEVEL NUMBER
AA1, Example 1	AA1.1
AA1, Example 2	AA1.2
AA1, Example 3	AA1.3
AA1, Example 4	Not Applicable
AA1, Example 5	Not Applicable
AA2, Example 2	AA2.1
AA2, Example 1	AA2.2
AA3, Example 1	AA3.1
CA3, Example 1	CA1.1
CA1, Examples 1, 2	CA2.1
CA4, Example 1, 2	CA3.1
FA1, Example 1	FA1.1
HA1, Example 1	HA1.1
HA1, Example 2	HA1.2
HA1, Example 4	HA1.3
A1, Example 3	HA1.4
HA1, Example 6	HA1.5
HA1, Example 5	HA1.6
HA2, Example 1	HA2.1
HA3, Example 1	HA3.1
HA4, Examples 1, 2	HA4.1
HA5, Example 1	HA5.1
HA6, Example 1	HA6.1
SA5, Example 1	SA1.1
SA2, Example 1	SA2.1
SA4, Example 1	SA4.1

CROSS REFERENCE
NEI 99-01, Revision 5 TO EAL NUMBER
FOR SITE AREA EMERGENCY CONDITIONS

NEI 99-01, Rev 5 INITIATING CONDITION	COOPER NUCLEAR STATION EMERGENCY ACTION LEVEL NUMBER
AS1, Example 1	AS1.1
AS1, Example 2	AS1.2
AS1, Example 3	Not Applicable
AS1, Example 4	AS1.3
CS1, Example 1	CS2.1
CS1, Example 2	CS2.2
CS1, Example 3	CS2.3
FS1, Example 1	FS1.1
HS4, Example 1	HS4.1
HS2, Example 1	HS5.1
HS3, Example 1	HS6.1
SS1, Example 1	SS1.1
SS2, Example 1	SS2.1
SS6, Example 1	SS4.1
SS3, Example 1	SS7.1

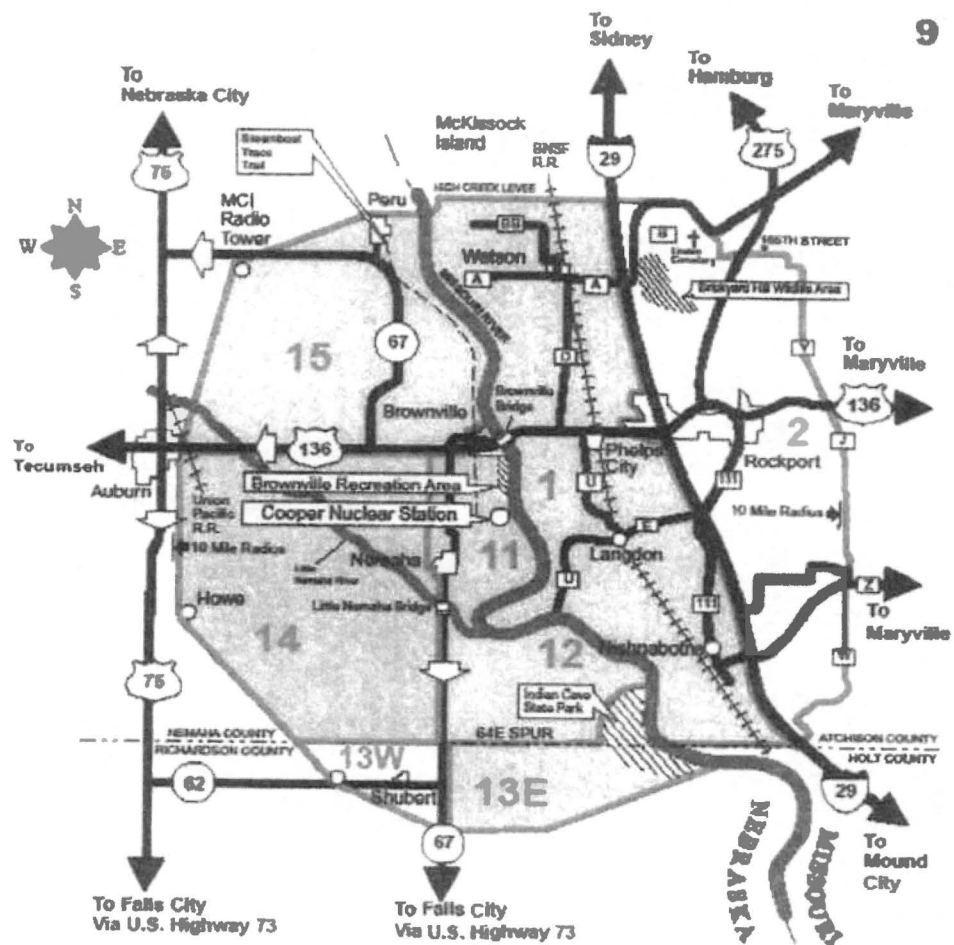
CROSS REFERENCE
NEI 99-01, Revision 5 TO EAL NUMBER
FOR GENERAL EMERGENCY CONDITIONS

NEI 99-01, Rev 5 INITIATING CONDITION	COOPER NUCLEAR STATION EMERGENCY ACTION LEVEL NUMBER
AG1, Example 1	AG1.1
AG1, Example 2	AG1.2
AG1, Example 3	Not Applicable
AG1, Example 4	AG1.3
CG1, Example 1	CG2.1
CG1, Example 2	CG2.2
FG1, Example 1	FG1.1
HG1, Examples 1, 2	HG4.1
HG2, Example 1	HG6.1
SG1, Example 1	SG1.1
SG2, Example 1	SG2.1

APPENDIX C

EVACUATION ROUTES/MAPS

APPENDIX C EVACUATION ROUTES/MAPS



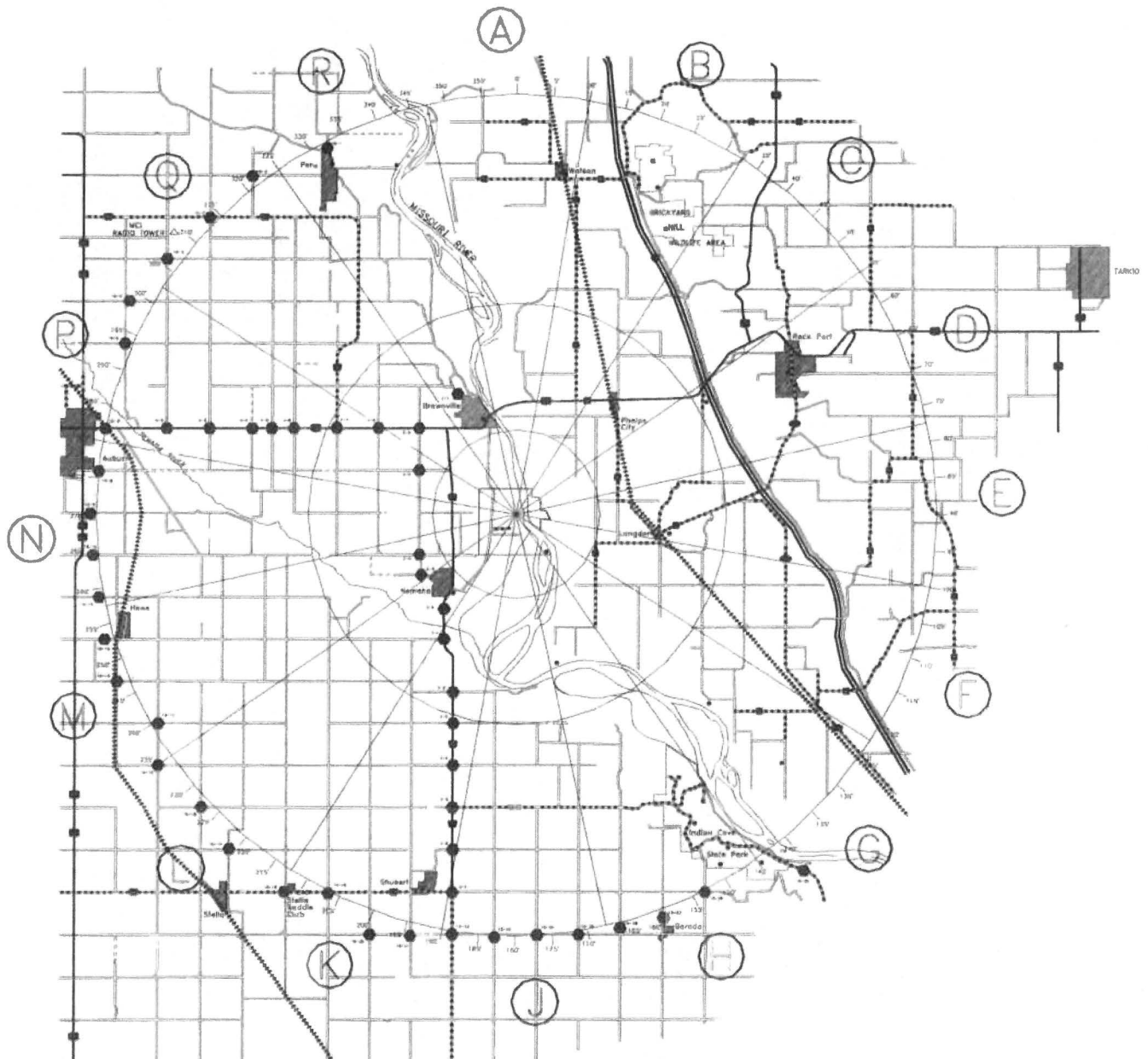
N E B R A S K A

LOCATION	EVACUATION ROUTES	RECEPTION CENTERS
11 From the Brownville Bridge on U. S. Highway 136, south along the west bank of the Missouri River to the confluence of the Little Nemaha with the Missouri River, northwest along the north bank of the Little Nemaha River, to U. S. Highway 67, then north to the intersection of Iowa Street and U. S. Highway 67 in Nemaha. Then following the southern and western boundary of Nemaha to Nebraska Avenue (which turns into County Road 725A) to the intersection of County Road 725A and 647 Avenue. North to the intersection of 647 Avenue and U. S. Highway 136, then east on U. S. Highway 136 to the intersection of U. S. Highway 136 and Nebraska Highway 67, then by and on a line following the western and northern boundaries of the Brownville City limits east to the Missouri River. This area includes the villages of Brownville and Nemaha, the Brownville State Recreation Area, and the Steamboat Trace Trail.	To Falls City... U.S. Highway 75 or Nebraska Highway 67 south to U.S. Highway 75 south to Falls City	FALLS CITY: Falls City Middle School 14th and Marion Streets.
12 From the Little Nemaha Bridge on Nebraska Highway 67 along the southern bank of the Little Nemaha River to the confluence of the Missouri River, along the Missouri River east and south to the northern boundary of Indian Cave State Park. Then west and south along the western boundary of Indian Cave State Park to Nebraska 64E Spur (Nemaha & Richardson Co. Line/Co. Road 720). Then west on Nebraska 64E Spur to Nebraska Highway 67 and north on Nebraska Highway 67 to the Little Nemaha River Bridge.		
13 E From the intersection of Nebraska 64E (Nemaha & Richardson Co. Line/Co. Road 720) and Nebraska Highway 67 west to, and including all of Indian Cave State Park, then south along the Missouri River (the park's eastern boundary) to the southeast corner of the park. From the southeast corner of the park by and on a line southwest to the intersection of County Road 717 and 661 Avenue, then west to Nebraska Highway 67. Then north on Nebraska Highway 67 to the intersection of Nebraska 64E Spur (Nemaha & Richardson Co. Line/Co. Road 720) and Nebraska Highway 67.		
13 W From the intersection of Nebraska Highway 67 and Nebraska 64E Spur (Nemaha & Richardson Co. Line/Co. Road 720) south to the intersection of Nebraska Highway 67 and County Road 717, then by and on a line northwest to the intersection of Nebraska Highway 62 and County Avenue 646, and continuing to the intersection of County Road 720 and 643 Avenue. Then east to the intersection of Nebraska Highway 67 and Nebraska 64E Spur (Nemaha & Richardson Co. Line/Co. Road 720). This area includes the village of Shubert.		
14 From the Union Pacific Railroad tracks crossing U. S. Highway 136 east of Auburn to the intersection of U. S. Highway 136 and County Avenue 647. South on Avenue 647 to the intersection of 725A Road and 647 Avenue, south and east on Road 725A (which turns into Nebraska Street in the village of Nemaha), east and south to the intersection of Iowa Street and Nebraska Highway 67. Then south on Nebraska Highway 67 to the intersection of Nebraska 64E Spur (Nemaha & Richardson Co. Line/County Road 720) and Nebraska Highway 67. West on Nemaha & Richardson Co. Line/County Road 720 to the intersection with 643 Avenue. Then by and on a line northwest to the Union Pacific Railroad tracks at County Road 724, (West side of Howe) continuing on a line north to the intersection of the Union Pacific Railroad tracks crossing U. S. Highway 136 east of Auburn. This area includes the Unincorporated Village of Howe.		
15 By and on a line from the intersection of the Union Pacific Railroad tracks and U. S. Highway 136 east of Auburn, northwest to the MCI Radio Tower (which is two miles east of U. S. Highway 75 just South of Nebraska Highway 67), continuing by and on a line northwest to the northern boundary of the Peru City limits and then by and on a line with the northern boundary of the Peru City limits east to the Missouri River. Then south along the west bank of the Missouri River to the Brownville Bridge on U. S. Highway 136 and west on U. S. Highway 136 to the intersection of the Union Pacific Railroad tracks east of Auburn and U. S. Highway 136. This area includes the city of Peru and the Steamboat Trace Trail.	To Nebraska City... U.S. Highway 136 west to U.S. Highway 75 north to Nebraska City...or proceed north & west on Nebraska Highway 67 to U.S. Highway 75 then north to Nebraska City.	NEBRASKA CITY: Nebraska City Middle School 1st Corso and 9th Street.

M I S S O U R I

1 Area bounded to the west by the Missouri River, to the north by 161st St. and continuing on across the High Creek Levee, to the east by Interstate 20 and to the south by the Atchison County Line. This includes the towns of Warsaw, Leavenworth and Independence. This does not include the Truck Stop Area west of I-20 on either side of U.S. route 136, which is within the city limits of Rock Port.	North on Route U to U.S. Route 136 east. East on Route E to State Highway 111 then north on Route 111 to U.S. Route 136 east. North on Route D to Route A, then east on Route A to Route B, then east on Route B to U.S. Highway 58, then south on U.S. Highway 58 to U.S. Highway 136 east.	MARYVILLE: Lambert Gymnasium 4th St. & Ray Ave. Northwest Missouri State University
2 Area bounded to the west by I-20 and includes the Interstate, to the north by the High Creek Levee, Route B, Gamew Road, and 161st St. to the east by K Avenue, Route Y across US 136 to continue south on Route J, then Route W, and to the south by the Atchison County line. This includes the Brickyard Hill Conservation area, the Town of Rock Port and that portion within the city limits that extends to the west of I-29 along U.S. Route 136	Route B to U.S. Route 58 and then south to U.S. Route 136 east. U.S. Highway 275 south to U.S. Route 136 east. State Highway 111 north to U.S. Route 136 east. East on Route Z and Route W, then north on Route J to U.S. Route 136 east.	

10 Mile EPZ



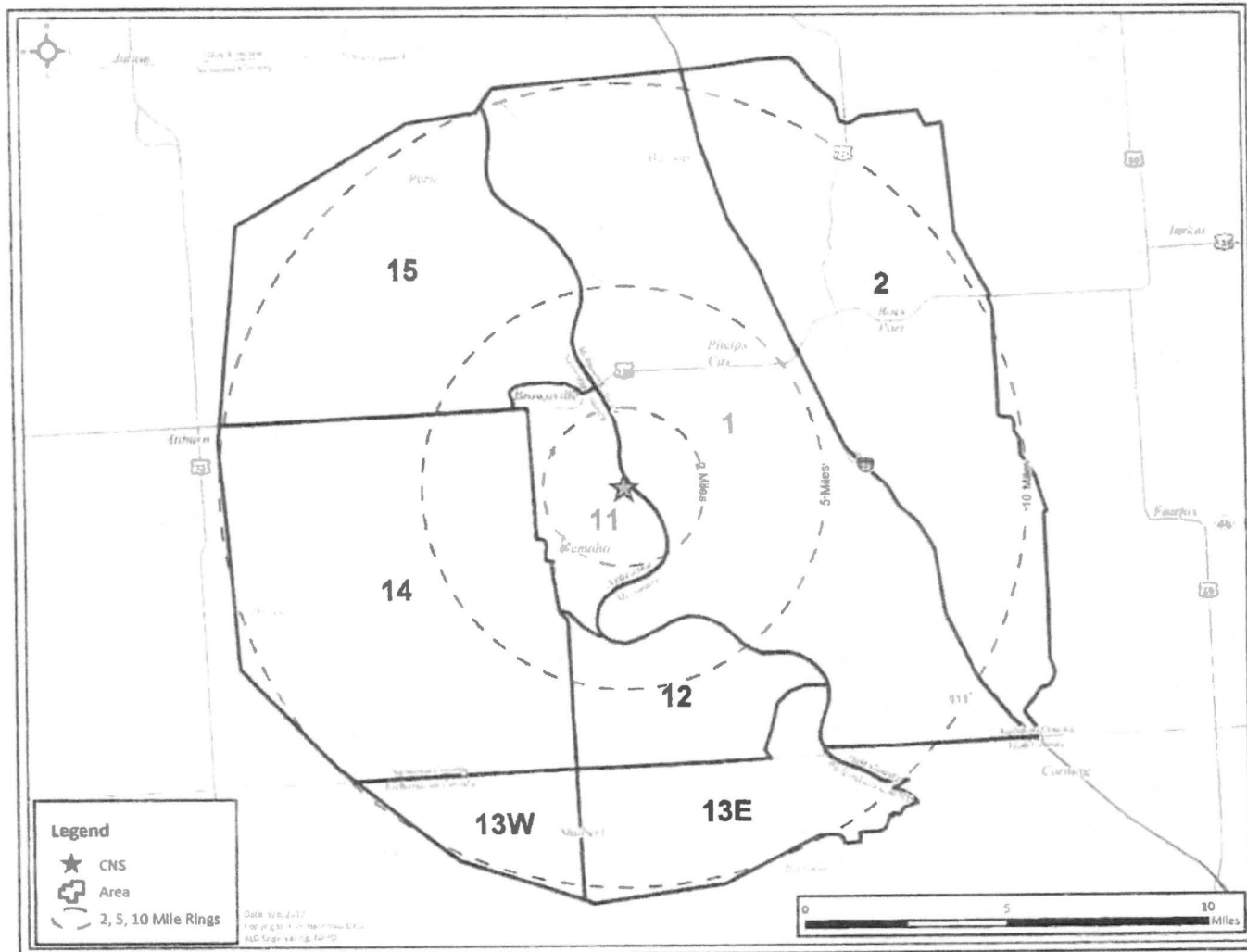


Figure 6-1. Cooper EPZ Areas

COOPER NUCEAR STATION-POPULATION ESTIMATES

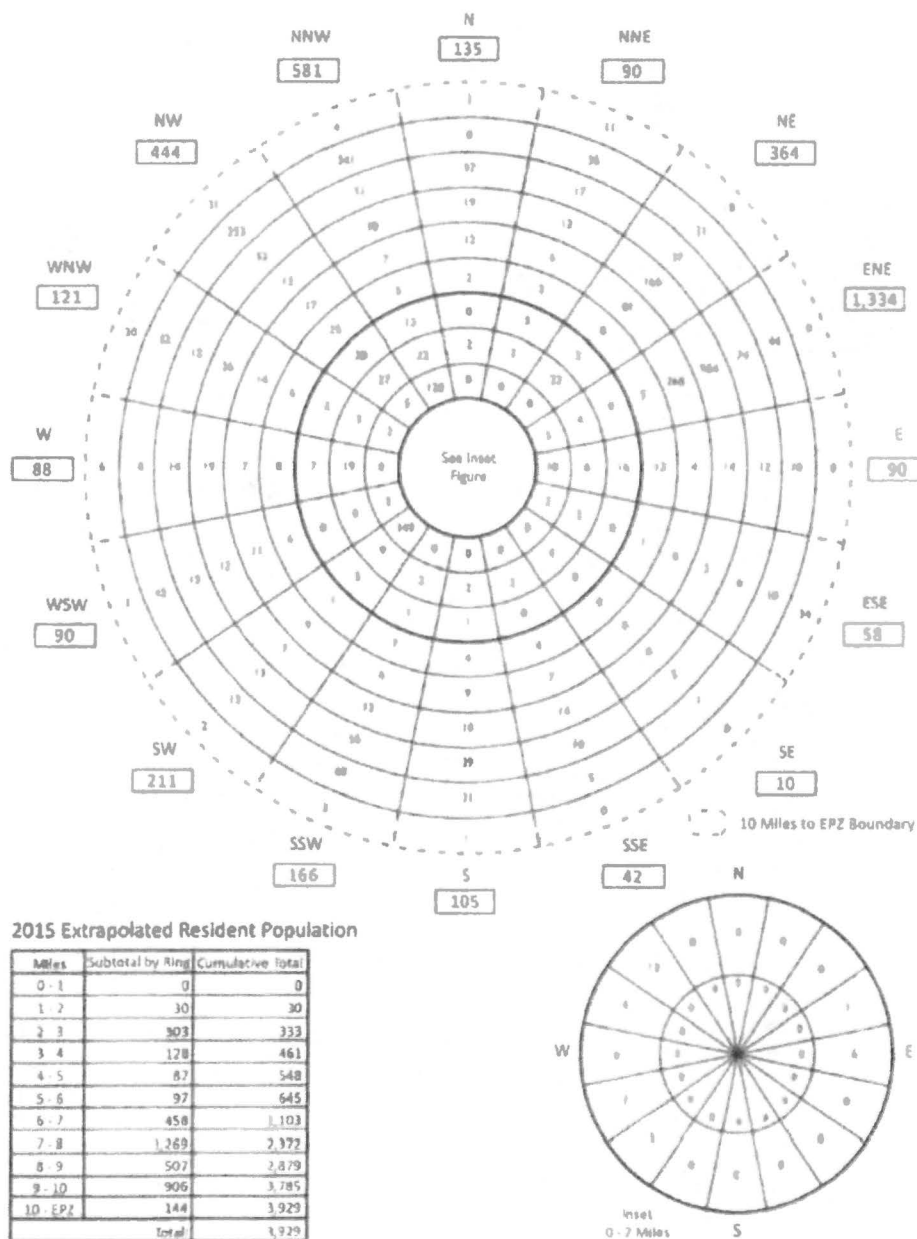


Figure 4. Permanent EPZ Resident Population by Sector

PRE-SELECTED SAMPLING POINTS



Table 5. EPZ Population

Area	2010 Population	2015 Extrapolated Population
1	294	282
11	135	135
2-Mile Region Total:	429	417
12	30	30
14	382	382
15	992	1,038
5-Mile Region Total:	1,833	1,867
2	1,921	1,802
13E	65	65
13W	196	195
EPZ Total:	4,015	3,929

Table 6. Shadow Population by Sector

Sector	2010 Population	2015 Extrapolated Population
N	73	70
NNE	48	47
NE	59	58
ENE	1,534	1,433
E	727	677
ESE	92	88
SE	40	40
SSE	107	107
S	136	136
SSW	92	92
SW	229	229
WSW	129	129
W	3,668	3,616
WNW	201	201
NW	63	63
NNW	18	18
Total	7,216	7,004

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

Scenario:	Summer		Summer		Summer	Winter			Winter			Winter	Summer	Summer
	Midweek		Weekend		Midweek Weekend	Midweek			Weekend			Midweek Weekend	Weekend	Midweek
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Region	Midday		Midday		Evening	Midday			Midday			Evening	Midday	Midday
	Good Weather	Rain	Good Weather	Rain	Good Weather	Good Weather	Rain	Snow	Good Weather	Rain	Snow	Good Weather	Special Event	Roadway Impact
Entire 2-Mile Region, 5-Mile Region, and EPZ														
R01	1:20	1:20	1:20	1:20	1:20	1:20	1:20	1:25	1:20	1:20	1:25	1:20	1:15	1:20
R02	1:35	1:35	1:30	1:30	2:15	1:40	1:45	1:50	1:30	1:30	2:05	2:15	1:25	1:35
R03	2:10	2:10	2:10	2:05	2:25	2:00	2:00	2:30	2:05	2:05	2:35	2:25	2:15	2:10
2-Mile Region and Keyhole to 5 Miles														
R04	1:20	1:25	1:20	1:25	1:35	1:20	1:25	1:35	1:20	1:25	1:30	1:35	1:20	1:20
R05	1:20	1:25	1:20	1:25	1:35	1:20	1:25	1:30	1:20	1:25	1:30	1:35	1:20	1:20
R06	1:35	1:35	1:30	1:30	2:10	1:40	1:40	1:50	1:30	1:30	2:05	2:10	1:25	1:35
R07	1:30	1:30	1:25	1:30	2:05	1:40	1:40	1:45	1:25	1:30	1:50	2:05	1:25	1:30
R08	1:20	1:20	1:20	1:20	1:25	1:20	1:20	1:25	1:20	1:20	1:25	1:25	1:15	1:20
5-Mile Region and Keyhole to EPZ Boundary														
R09	1:40	1:40	1:35	1:35	2:15	1:45	1:45	1:55	1:35	1:35	2:05	2:15	2:10	1:40
R10	1:35	1:35	1:30	1:30	2:10	1:40	1:45	1:50	1:30	1:30	2:00	2:10	1:25	1:35
R11	2:10	2:10	2:10	2:05	2:25	2:00	2:00	2:25	2:10	2:05	2:35	2:25	1:45	2:10
R12	2:10	2:10	2:05	2:05	2:25	2:00	2:00	2:30	2:05	2:05	2:30	2:25	2:00	2:10
2-Mile Region and Keyhole to EPZ Boundary														
R13	1:30	1:30	1:25	1:25	1:50	1:30	1:30	1:50	1:25	1:25	1:45	1:50	1:45	1:35
R14	1:20	1:25	1:20	1:20	1:30	1:20	1:25	1:30	1:20	1:20	1:30	1:30	1:20	1:20
R15	1:35	1:35	1:30	1:30	2:10	1:40	1:45	1:50	1:30	1:30	2:00	2:10	1:25	1:35
R16	2:10	2:10	2:10	2:05	2:25	2:00	2:00	2:25	2:10	2:05	2:35	2:25	1:45	2:10
R17	2:05	2:05	2:00	2:00	2:25	1:55	1:55	2:25	2:00	2:00	2:30	2:25	1:40	2:05
R18	1:50	1:50	1:40	1:40	2:20	1:50	1:50	2:20	1:40	1:40	2:15	2:20	1:30	1:50
R19	1:55	1:55	1:40	1:40	2:15	1:55	1:50	2:25	1:40	1:40	2:15	2:15	1:40	1:55
R20	1:55	1:55	1:45	1:45	2:20	1:55	1:55	2:25	1:45	1:45	2:20	2:20	1:50	1:55
Staged Evacuation - 2-Mile Region and Keyhole to 5 Miles														
R21	1:35	1:35	1:35	1:35	1:50	1:35	1:35	1:40	1:35	1:35	1:45	1:50	1:25	1:35
R22	1:35	1:35	1:35	1:35	1:50	1:35	1:35	1:40	1:35	1:35	1:40	1:50	1:25	1:35
R23	1:50	1:50	1:50	1:50	2:15	1:45	1:45	1:55	1:50	1:50	2:05	2:15	1:45	1:50
R24	1:45	1:45	1:45	1:50	2:05	1:45	1:45	1:50	1:45	1:50	1:55	2:05	1:45	1:45
R25	1:20	1:20	1:20	1:20	1:30	1:20	1:20	1:30	1:20	1:20	1:25	1:30	1:15	1:20
R26	1:50	1:50	1:50	1:50	2:15	1:45	1:45	1:55	1:50	1:50	2:05	2:15	1:45	1:50

Table 7-5. Description of Evacuation Regions

Region	Description	Area							
		1	2	11	12	13E	13W	14	15
R01	2-Mile Radius	x		x					
R02	5-Mile Radius	x		x	x			x	x
R03	Full EPZ	x	x	x	x	x	x	x	x
Evacuate 2-Mile Radius and Downwind to 5 Miles									
Region	Wind From °	Area							
		1	2	11	12	13E	13W	14	15
R04	347 to 58	x		x	x			x	
R05	59 to 76	x		x				x	
R06	77 to 170	x		x				x	x
R07	171 to 215	x		x					x
N/A	216 to 279	Refer to R01							
R08	280 to 346	x		x	x				
Evacuate 5-Mile Radius and Downwind to EPZ Boundary									
Region	Wind From °	Area							
		1	2	11	12	13E	13W	14	15
R09	329 to 35	x		x	x	x	x	x	x
R10	36 to 80	x		x	x		x	x	x
N/A	81 to 144	Refer to R02							
R11	145 to 279	x	x	x	x			x	x
R12	280 to 324	x	x	x	x	x		x	x
N/A	325 to 328	Refer to R03							
Evacuate 2-Mile Radius and Downwind to EPZ Boundary									
Region	Wind From °	Area							
		1	2	11	12	13E	13W	14	15
R13	329 to 35	x		x	x	x	x	x	
R14	36 to 54	x		x	x		x	x	
N/A	55 to 58	Refer to R10							
R15	59 to 80	x		x			x	x	x
N/A	81 to 144	Refer to R06							
R16	145 to 170	x	x	x				x	x
R17	171 to 215	x	x	x					x
R18	216 to 279	x	x	x					
R19	280 to 324	x	x	x	x	x			
R20	325 to 328	x	x	x	x	x	x	x	
Staged Evacuation - 2-Mile Radius Evacuates, then Evacuate Downwind to 5 Miles									
Region	Wind From °	Area							
		1	2	11	12	13E	13W	14	15
R21	347 to 58	x		x	x			x	
R22	59 to 76	x		x				x	
R23	77 to 170	x		x				x	x
R24	171 to 215	x		x					x
N/A	216 to 279	Refer to R01							
R25	280 to 346	x		x	x				
R26	5 Mile-Region	x		x	x			x	x
Area(s) Shelter-in-Place until 90% ETE for R01, then Evacuate		Area(s) Shelter-in-Place				Area(s) Evacuate			

Letters of Agreement (LOAs) supporting the CNS Emergency Plan are listed on the following page, and are incorporated in the Emergency Plan by reference. The Emergency Plan signature page verifies a signed copy of a current Letter of Agreement is on file per this Appendix. Copies of the current Letters of Agreement and a listing of their effective dates are maintained in the Emergency Preparedness office.

Letters of Agreement are reviewed annually by the CNS Emergency Preparedness Department. Each organization is then contacted. The type of support defined in the letters is discussed to determine if any significant changes have occurred. If significant changes have occurred, a Letter of Agreement is requested from the agency. If there are no significant changes, the Letters of Agreement are certified current by the CNS Emergency Preparedness Department and documented with a record of telephone conversation or other appropriate documentation. A change in original signatory(ies) to a given Letter of Agreement does not in itself require revision of that Letter.

The documentation associated with this review process is maintained by the CNS Emergency Preparedness Department.

LETTERS OF AGREEMENT

Letters of Agreement supporting the CNS Emergency Plan are certified annually. Copies of the current Letters of Agreement and listing of their effective dates are maintained in the Emergency Preparedness office.

Agreement

1. Nemaha County Hospital
2. Auburn Rescue Squad
3. Nebraska State Patrol
4. Nebraska State Patrol/Nebraska State Emergency Management Agency
5. Nebraska State Emergency Management Agency/NPPD
6. Nebraska Department of Health and Human Services
7. Missouri State Emergency Management Agency
8. Kansas Division of Emergency Management
9. Iowa Emergency Management Division
10. Atchison County Commission
11. Nemaha County Commission
12. Richardson County Commission
13. Institute of Nuclear Power Operations
14. General Electric - Hitachi (SIL 324, Rev 7)
15. Omaha Public Power District/Fort Calhoun Station
16. Nebraska State Emergency Management Agency/
Nebraska Game and Parks Commission/NPPD
17. Peru State College
18. Brownville Fire Department
19. Auburn Fire Department
20. Nemaha Fire Department
21. Peru Fire Department

22. Nebraska City Volunteer Fire Department (NRC Commitment NLS2005104-04)
23. University of Nebraska Medical Center
24. Mirion
25. Midwest Medical Transport
26. Nemaha County Hospital (Use of helicopter pad)
(NRC Commitment NLS2012048-03)
27. Nebraska Emergency Management Agency (NEMA), Nebraska Department of Health and Human Services, Division of Public Health, and NPPD (NRC Commitment NLS2012048-03)
28. Nemaha Rescue Squad
29. Otoe County Emergency Management Agency

This appendix contains a list of supplies that is typical of the inventory kept in the Emergency Response Lockers. For a precise inventory of the equipment and supplies, and who is responsible for it, refer to the most current revision of EPIP 5.7.21, Maintaining Emergency Preparedness-Emergency Exercises, Drills, Tests, and Evaluations.

EMERGENCY EQUIPMENT MAINTAINED - CONTROL ROOM

A. GENERAL SUPPLIES

1. Coveralls
2. Shoe Covers
3. Gloves
4. Geiger-Mueller Survey Meter (Range 0–50 mR/Hr)
5. Ion-Chamber Survey Instrument (Range 0–50 R/Hr)
6. Dosimeter, Direct Reading, Electronic
7. Radiation Monitor (Frisker)
8. Step-Off Pad
9. Thyroid Blocking Tablets (KI)

B. RESPIRATORY PROTECTION EQUIPMENT

NOTE – The air breathing equipment is not within the Emergency Locker. The cases are located near the Emergency Locker for convenience, inspection, and maintenance.

1. Air Breathing Masks (Self-Contained with Voice Communicators)
2. Full-Face Filter Masks with Filters
3. Full-Face Filter Masks with Filters and Voice Communicators
4. Spare Air Cylinders

C. MISCELLANEOUS (Supplies)

1. Plastic Bag, Large
2. Radiation Warning Signs
3. Radiation Barrier Rope
4. Radiation Warning Tape
5. Hand Lantern, with 6-Volt Battery
6. Flashlight, with Two "D" Cell Batteries
7. Batteries for Hand Lantern (6 Volt)
8. Batteries for Flashlights ("D" Cell)
9. Batteries for Mask Voice Communicators (9 Volt)
10. First Aid Kit

EMERGENCY EQUIPMENT MAINTAINED -TSC/OSC

A. GENERAL SUPPLIES AND PROTECTION EQUIPMENT

1. Flashlight, with Two "D" Cell Batteries
2. Masking Tape
3. Particulate Filter, 2"
4. Charcoal and Silver Zeolite Cartridges
5. Air Sample Plastic Bags and Labels
6. Smear Books
7. Spare Batteries
8. Personnel Radiation Monitor
9. Step-Off Pads
10. Protective Clothing (Full Sets)
11. Self-Contained Breathing Apparatus
12. Spare Bottle for SCBA
13. Thyroid Blocking Tablets (KI)
14. Survey Instrument Ion Chamber (Range 0 to 50 R/hr)
15. IAC/Electrical Tool Kits
16. Volt Ohmmeter
17. Radiological Posting Supplies
18. Mechanical Maintenance Tool Kit
19. Coveralls, Paper
20. Shoe Covers, Disposable 14"
21. Gloves, Disposable
23. Continuous Air Monitor

B. EMERGENCY RESCUE LOCKER EQUIPMENT

1. Wrecking Bar
2. Bolt Cutters
3. Hacksaw and Blades
4. Come-Along
5. Cable Slings

EMERGENCY EQUIPMENT MAINTAINED -TSC/OSC

6. Hydraulic Jacks
7. Sledge Hammers
8. Porta Power
9. Web Slings
11. Safety Belt and Line
12. Fire Axe
13. Crow Bar
14. 200'-3-Part Block and Tackle
15. Battery Lanterns

EMERGENCY EQUIPMENT MAINTAINED - ALTERNATE OSC (AOSC)

A. GENERAL SUPPLIES AND PROTECTION EQUIPMENT

1. Coveralls, Paper
2. Shoe Covers
3. Gloves, Disposable
4. Step-Off Pad
5. Area Radiation Monitors
6. Continuous Air Monitor
7. Radiation Monitor (Frisker)
8. Flashlight, with 2 "D" Cell Batteries
9. Spare Batteries ("D" Cell)
10. Thyroid Blocking Tablets (KI)
11. Team Dispatch Forms

EMERGENCY EQUIPMENT MAINTAINED - EOF

A. GENERAL SUPPLIES

1. Coveralls
2. Shoe Covers
3. Gloves
4. Extendable Probe Survey Instrument (Range 0–1,000 R/Hr)
5. Ion-Chamber Survey Meter (Range 0–50 R/Hr)
6. Geiger-Mueller Survey Meter (Range 0–50 mR/Hr)
7. Sample Holder with Pancake-Type Detector
8. Scaler Electronic Package
9. Dosimeter, Direct Reading Electronic
10. Thyroid Blocking Tablets
11. Spare Batteries ("AA" Cell)
12. Charcoal Filter for Air Samplers
13. Silver Zeolite Cartridges for Air Samplers
14. Extension Cord, Electric (50')
15. Radiation Monitor (Frisker)
16. Area Radiation Monitor
17. Continuous Air Monitor
18. Step-Off Pads

B. MISCELLANEOUS (Supplies)

1. Plastic Sheeting
2. Plastic Bag, Small
3. Plastic Bag, Large
4. Radiation Warning Signs
5. Radiation Barrier Rope
6. Smear Books
7. Radiation Warning Tape
8. Hand Lantern with 6-Volt Battery
9. Flashlight, with Two "D" Cell Batteries

10. Batteries for Hand Lantern (6 Volt)
11. Batteries for Flashlights ("D" Cell)
12. Small Hand Tool Kit with Straight Slot Screwdriver, Phillips Screwdriver, Small Pliers, and Small Vise Grip

C. FIRST AID AND RESCUE EQUIPMENT

NOTE – Stretcher stored near Emergency Locker.

1. First Aid Kit
2. Stretcher

EMERGENCY EQUIPMENT MAINTAINED - WEST WAREHOUSE

A. EMERGENCY FIELD MONITORING KIT SUPPLIES

1. Full-Face Respirator
2. Hand Lantern
3. Spare Batteries
4. Dosimeter, Direct Reading Electronic
5. Health Physics Procedure 9.EPIN.1, Emergency Air Samplers
6. Calculator
7. Portable Radios
8. Geiger Mueller Survey Instrument
9. Ion Chamber Survey Instrument
10. Paper Coveralls
11. Rubber Shoe Covers
12. Sample Bottles
13. Masslin Cloths
14. One-Piece Plastic Coveralls
15. Complete Set of EIPs
16. 2" Air Sample Filters
17. Silver Zeolite Cartridges
18. Charcoal Cartridges
19. 2" Millipore Air Sample Filters
20. Smear Books
21. Air Sampler with Head
22. Radioactive Material Stickers
23. 10-Mile Radius Map
24. Site Map
25. Plastic Bags
26. Disposable Gloves
27. Thyroid Blocking Tablets (KI)
28. Combination Cartridge for Respirator
29. Shovel

EMERGENCY EQUIPMENT MAINTAINED - WEST WAREHOUSE

- 30. Masking Tape
- 31. Plastic Sheeting
- 32. Plastic Pipet
- 33. 2 cc Vial
- 34. Sample Labels
- 35. Grass Shears
- 36. Bolt cutters

EMERGENCY EQUIPMENT MAINTAINED - COMMUNICATIONS BUILDING

A. PERSONNEL DECONTAMINATION SUPPLIES

1. Soap
2. Septisol (Germicide)
3. Lanolin
4. Swabs, Cotton Tipped, 100s
5. Compresses, Gauze, 3" x 3", 100s
6. Towels, Paper
7. Beaker, Plastic, 100 ml
8. Hand Brush
9. Towels

B. FIRST AID AND RESCUE EQUIPMENT

NOTE – Stretcher stored near Emergency Locker.

1. First Aid Kit
2. Stretcher
3. Rope, 1/2"—50'

EMERGENCY EQUIPMENT MAINTAINED - AMBULANCE

A. EMERGENCY EQUIPMENT MAINTAINED FOR AMBULANCE

1. Dosimeter, Direct Reading Electronic
2. Spare Batteries
3. DLR Badge
4. Geiger-Mueller Survey Meter
5. Ion-Chamber Survey Instrument
6. Radiation Tags
7. Smear Books
8. DLR Badging Record

EMERGENCY EQUIPMENT MAINTAINED - HOSPITAL

A. EMERGENCY EQUIPMENT MAINTAINED AT HOSPITAL

1. Radiation Barrier Rope
2. Masking Tape
3. Absorbent Paper
4. Plastic Sheeting
5. Applicable Radiation Warning Signs
6. Shoe Covers
7. Bags, Plastic (Large)
8. Bags, Plastic (Small)
9. Radiation Marking Tape
10. Coveralls
11. Gloves, Rubber Disposable
12. Cardboard Boxes, 2' x 3'
13. Masolin Cloths
14. Step-Off Pad

EMERGENCY EQUIPMENT MAINTAINED - OFF-SITE ASSEMBLY AREA

A. EMERGENCY EQUIPMENT MAINTAINED AT OFF-SITE ASSEMBLY AREA

1. Geiger-Mueller Survey Instrument
2. Disposable Coveralls
3. Disposable Gloves
4. 2" Masking Tape
5. Large Poly Bags
6. Small Poly Bags
7. Bar Soap
8. Bath Towel
9. Procedure 9.EN-RP-104, Personnel Contamination
10. Pumice Soap
11. Lanolin
12. Swabs, Cotton-Tipped
13. Paper Towels
14. Hand Brush, Soft Bristle
15. High-Top Bootie
16. Shoe Cover(s) Various Sizes
17. Rad Rope
18. Radiological Posting Signs With Inserts

EMERGENCY VEHICLES MAINTAINED - CNS

A. EMERGENCY VEHICLES MAINTAINED AT CNS

1. All Wheel/Four Wheel Drive Vehicle with High and Low Band Radio for Emergency Preparedness/Security Use Only
2. All Wheel/Four Wheel Drive Vehicle with High and Low Band Radio for Emergency Preparedness/Security Use Only
3. Ambulance (2WD), Chassis with Medical Configuration and Two-Way Radio for Medical Use Only.

NEBRASKA

1. State of Nebraska Radiological Emergency Response Plan for Nuclear Power Plant incidents-Nebraska Emergency Management Agency.
2. Radiological Emergency Response Plan for Nuclear Power Plant incidents for Richardson County-Nebraska Emergency Management Agency, Richardson County Emergency Management Agency.
3. Radiological Emergency Response Plan for Nuclear Power Plant incidents for Nemaha County-Nebraska Emergency Management Agency, Nemaha County Emergency Management Agency.
4. Radiological Emergency Reception Plan for Nuclear Power Plant incidents for Otoe County-Nebraska Emergency Management Agency, Otoe County Emergency Management Agency.

MISSOURI

5. State of Missouri State Emergency Management Agency Nuclear Accident Plan-Missouri State Emergency Management Agency.
6. Atchison County Radiological Emergency Response Plan-Atchison County, Missouri.

KANSAS

7. The State of Kansas, Radiological Emergency Response Plan for Nuclear Facilities - Kansas Division of Emergency Management.

IOWA

8. State of Iowa Radiological Emergency Response Plan Iowa Department of Homeland Security, Emergency Management Division.

FEDERAL

9. National Response Framework-United States Nuclear Regulatory Commission; Department of Homeland Security, Federal Emergency Management Agency.