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Early C. Ewing III Director, Nuclear Safety Assurance Waterford 3

W3F1-99-0190 A4.05 PR

January 7, 2000

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

Subject:

Waterford 3 SES Docket No. 50-382 License No. NPF-38 Emergency Plan Implementing Procedures

Gentlemen:

POR ADOCH 05000382

In accordance with Appendix E of 10CFR50 and 10CFR50.4(b)(5), Entergy is submitting the enclosed changes to two Waterford 3 Emergency Plan Implementing Procedures. These changes were reviewed in accordance with 10CFR50.54(q) requirements and were determined not to decrease the effectiveness of the emergency plan.

This letter does not contain any commitments.

Included in this submittal are the changes for the following procedures:

- 1. EP-002-081 (Revision 7), Search and Rescue. The changes made are administrative and include changes to the procedure's format.
- 2. EP-002-150 (Revision 11), Emergency Plan Implementing Records. The changes made are administrative and include changes to the procedure's format.

A845

Emergency Plan Implementing Procedures W3F1-99-0190 Page 2 January 7, 2000

Should you have any questions concerning these procedures, please contact J.J. Lewis, Emergency Planning Manager, at (504) 739-6185.

Very truly yours,

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Evening P. Parting (for ECEW, rig)

E.C. Ewing Director, Nuclear Safety Assurance

ECE/DCM/ssf Attachments

CC:

(w/Attachments) E.W. Merschoff, NRC Region IV (2 copies)

(w/o Attachments) N. Kalyanam, NRC-NRR W.A. Maier, NRC Region IV J. Smith N.S. Reynolds NRC Resident Inspectors Office

ATTACHMENT 1 TO W3F1-99-0190

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EP-002-081, REVISION 7 (SEARCH AND RESCUE)

RE	QUEST/APPROVAL PAGE	
SAFETY R	ELATED	Required Review Level (check one) PORC QUALIFIED REVIEWER
PROCEDURE NUMBER: EP-002-0	B1 REVISION: 7	7 CHANGE: 0
TITLE: Search and Rescue		
	N//	-
	(N/A If Same as)	Approval Date)
PROCEDURE OWNER: Emergency Pla	anning Manager (Position Title	a)
PREPARER (Print Name / Initial):	Michael L. Huskey / Jucka	
ACTION:		
New Procedure Deletion Revision		
Change Change	EC?	
Deviation Expir	(A	Applicable W2.302 Step Numbers)
	cable Conditions:	····
DESCRIPTION AND JUSTIFICATION OF CHA		
Request/Approval Page Continuation Shee	et(s) attached.	
	APPROVAL: // N/	A DATE:
	REVIEW:	2 Frilds DATE: 14/16/99
	REVIEW:	C DATE: ()-10.99
TECHNICAL REVIEWER	REVIEW: 4.5. fr	Lih. DATE: 4/15/99
Change Notice (CN)?		
- · · ·	APPROVAL: N/	A DATE:
	APPROVAL: N/	
		Final Approval Due By:
	REVIEW: U.S.	
GROUP/DEPT. HEAD REVIEW or		DATE: 12-10-99
GM, PLANT OPERATIONS REVIEW] or		
	APPROVAL: N//	
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1-8

Revision 7

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1.0 PURPOSE

1.1 To provide guidance to the Operational Support Center Supervisor and Search and Rescue Team Leaders for the search and rescue of personnel who may be missing, trapped, or injured.

2.0 REFERENCES

- 2.1 EP-002-030, Emergency Radiation Exposure Guidelines and Controls
- 2.2 EP-002-031; In-Plant Radiological Controls and Surveys During Emergencies
- 2.3 EP-002-032, Monitoring and Decontamination
- 2.4 EP-002-101, Operational Support Center (OSC) Activation, Operation and Deactivation
- 2.5 EP-002-130, Emergency Team Assignments
- 2.6 EP-002-150, Emergency Plan Implementing Records
- 2.7 EP-002-190, Personnel Accountability
- 2.8 UNT-007-017, Confined Space Entry
- 2.9 UNT-007-018, First Aid and Medical Care

3.0 **RESPONSIBILITIES**

- 3.1 The OSC Supervisor and the Search and Rescue Team Leader are responsible for implementing the appropriate steps of this procedure.
- 3.2 The Emergency Coordinator has overall responsibility for assembling the Search and Rescue Team.

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4.0 INITIATING CONDITIONS

- 4.1 This procedure should be implemented when:
 - 4.1.1 Personnel have not been accounted for in accordance with EP-002-190.
 - 4.1.2 Personnel are unable to exit an area without assistance.
 - 4.1.3 As directed by the Emergency Coordinator or OSC Supervisor.

5.0 PROCEDURE

5.1 OSC Supervisor Actions

NOTE

Search and Rescue Team(s) should consist of individuals from Operations, Maintenance, Health Physics, Chemistry and/or Security.

- 5.1.1 Select two individuals at a minimum and assign one as team leader.
 - 5.1.2 Determine the designated search area.
 - 5.1.3 Ensure the team is briefed on the following:
 - 5.1.3.1 In accordance with EP-002-130, Attachment 7.2, Emergency Team Briefing Sheet.
 - 5.1.3.2 On radiological hazards in accordance with EP-002-031.
 - 5.1.3.3 That dose limits specified in 10CFR20 are not exceeded without the Emergency Coordinator's permission, in accordance with EP-002-030.
 - 5.1.4 Maintain continuous personnel accountability in accordance with EP-002-190.
- 5.1.5 Notify the Emergency Coordinator when the team has been dispatched.
- 5.1.6 If persons are injured and/or contaminated and offsite medical assistance is requested, then_refer to UNT-007-018.
- 5.1.7 Provide assistance to team as necessary.
- 5.1.8 After the search and rescue operation is complete, ensure team members are debriefed in accordance with EP-002-130, Attachment 7.3, Emergency Team Debriefing Sheet.

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- 5.1.9 After debriefing, collect all logs and records pertaining to the search and rescue operations. The OSC Supervisor should direct that they be controlled in accordance with EP-002-150.
- 5.1.10 The OSC Supervisor should inform the TSC of the results of the search and rescue task.

- 5.2 Search and Rescue Team Leader Emergency Actions
 - 5.2.1 Designate a team member as communicator and instruct him to obtain a handheld radio.
 - 5.2.1.1 Perform a radio check with the OSC Supervisor Communicator.
 - 5.2.2 Direct a team member(s) to obtain any safety equipment that may be required.
 - 5.2.2.1 Ensure that all equipment to be used by the team is functional.
 - 5.2.3 Ensure dose rate meters are turned on and source checked before the teams leaves the OSC.
 - 5.2.4 Conduct search and rescue operations.
 - 5.2.4.1 Proceed to the designated search area with the dose rate meter turned on.
 - 5.2.4.2 Ensure that communications are maintained with the OSC at predetermined intervals.
 - 5.2.4.3 Ensure that the OSC is kept informed of team's location, observations, and search result.

NOTE

The requirements of UNT-007-017 may be suspended if SCBAs are worn by the Search and Rescue Team members.

- 5.2.4.4 Ensure that the requirements of UNT-007-017 are implemented as required.
- 5.2.4.5 When the missing individual is located, determine if additional assistance, First Aid or Health Physics, is required.

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- 5.2.4.6 Report the following findings to the OSC as soon as possible:
 - A. Location where the missing individual was found
 - B. Extent of injuries, if applicable
 - C. Contamination levels, if applicable
 - D. Radiation levels, if applicable
 - E. First aid administered, if applicable
- 5.2.4.7 Request assistance from the OSC Supervisor for transport of any injured or contaminated individuals, if required.
- 5.2.4.8 Upon completion of search and rescue operations, report to the OSC for debriefing.

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6.0 FINAL CONDITIONS

- 6.1 Missing individual(s) located and removed from hazardous area.
- 6.2 Secured when directed by the Emergency Coordinator.

7.0 ATTACHMENTS

None

8.0 RECORDS

None

ATTACHMENT 2 TO W3F1-99-0190

EP-002-150, REVISION 11 (EMERGENCY PLAN IMPLEMENTING RECORDS)

·	REQUEST/APPROVAL PAGE	
SAFETY I	RELATED	Required Review Level (check one) PORC QUALIFIED REVIEWER
PROCEDURE NUMBER: EP-0	02-150 REVISION: 1	1 CHANGE: 0
TITLE: Emergency Plan Implementing	Records	
EFFECTIVE DATE/MILESTONE:	N/	A
PROCEDURE OWNER: Emergen	(N/A If Same as	Approval Date)
Energen	cy Planning Manager (Position Titl	e)
PREPARER (Print Name / Initial):		Or Hola, DATE: 11-11-99
ACTION:		
New Procedure Deletion Revision		
Change	EC?	
Deviation	() Expiration Date/Milestone:	Applicable W2.302 Step Numbers)
	Applicable Conditions:	
Request/Approval Page Continuation	Sheet(s) attached.	
EC SUPERVISOR	APPROVAL:	A DATE:
50.59 REVIEWER Required? 🔀	REVIEW:	EllaDATE: 11/18/99
0.54 REVIEWER Required?		DATE: 12-13-99
ECHNICAL REVIEWER	REVIEW: C. J. L	DATE: 11/19/99
hange Notice (CN)?	<i>i</i>	
HANGE NOTICE (CN) SUPERVISOR	APPROVAL: N/	A DATE:
HANGE NOTICE (CN) ON-SHIFT SS/CF	RS APPROVAL: N/	
		Final Approval Due By:
UALIFIED REVIEWER Required?	REVIEW: 13.5-12	In. DATE: 11/18/99
		DATE: 12-13-99
ICE PRESIDENT, OPERATIONS	APPROVAL: N/	A DATE:
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Emergency Plan Implementing Procedure Emergency Plan Implementing Records

EP-002-150 Revision 11

1.0 PURPOSE

- 1.1 This procedure provides guidance to emergency response personnel for the following:
- 1.1.1 The use of the Communications Log, the Facility Log and the Emergency Telephone/Radio Log;
- 1.1.2 Basic logkeeping practices;
- 1.1.3 The final disposition of all documentation generated during an emergency.

2.0 REFERENCES

2.1 Waterford 3 SES Emergency Plan

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3.0 **RESPONSIBILITIES**

- 3.1 The Emergency Coordinator and the EOF Director (when activated) have the overall responsibility to ensure that detailed records are maintained for the duration of each emergency situation.
- 3.2 The following emergency personnel are responsible to ensure that all documentation generated during an emergency is collected and forwarded to the Emergency Planning Coordinator upon termination of the emergency condition.
 - Shift Superintendent Control Room
 - TSC Supervisor TSC
 - OSC Supervisor OSC
 - Administration/Logistics Coordinator EOF
 - Radiological Controls Coordinator -4 Control Point

NOTE

The ENS Communicator and communicators on the HPN line are exempted from the requirements of step 3.3.

3.3 Each individual listed in Attachment 7.4 who responds to an emergency condition is responsible for maintaining detailed records which document their activities during the course of the emergency and recovery.

4.0 INITIATING CONDITIONS

4.1 This procedure is to be initiated upon declaration of an emergency (Unusual Event, Alert, Site Area Emergency or General Emergency) or in the event of precautionary staffing of emergency response facilities.

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5.0 PROCEDURE

NOTE

Refer to Attachment 7.3 for an example of many of the items outlined in this section.

- 5.1 Basic Logkeeping Practices
 - 5.1.1 A black, ball-point pen should be used for all emergency log entries.
 - 5.1.2 The use of abbreviations and acronyms should be avoided unless:
 - 5.1.2.1 They are previously defined in the log with the acronym/abbreviation shown in parentheses Emergency Coordinator(EC).
- 5.1.3 Each entry shall indicate, in the left margin, the time (using the 24-hour clock) at which the event was recorded in the log.
- 5.1.4 Each entry will be a detailed account of the event. The log should answer the questions: who, what; when; where; and how much.
 - 5.1.4.1 No entries documenting the transmission of information recorded on a Communications Log, Telephone/Radio Log or Notification Message Form are required for Facility Logs. These messages are sufficiently documented by other means.
- 5.1.5 A new page should be used for the first entry of each day (midnight) during the course of the emergency, and/or at change of shift.
- 5.1.6 Corrections to emergency logs should be made as follows:
 - 5.1.6.1 Errors Draw a single line through the incorrect entry, then date and initial it. Enter the correct information above the error.

NOTE

Late entries should not be used to document events which have occurred prior to the initiation of your log.

- 5.1.6.2 Late Entries (L.E.) If an event was observed but, for some reason, was omitted from the log, <u>then</u> a late entry can be made by placing the abbreviation "L.E." in the left margin and entering the time and description of the event, as if it had been entered at the correct time.
- 5.1.7 Listed below are several examples of different events that would be entered in emergency logs. (This list is provided as a reference and is not intended to be all-inclusive).
 - Changes in emergency classification.
 - Summary of decision-making meetings/discussions.
 - Requests for information or services and responses to such requests.
 - Recommendations made to other organizations and the actions taken as a result of these recommendations.
 - Turnover of responsibilities to relief personnel or other organizations.
 - Failures of emergency equipment and corrective action taken.
 - Change of logkeeper.

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5.2 Communications Log

- 5.2.1 The Communications Log, Attachment 7.1, will be used to document messages transmitted to, or received from, offsite agencies (other than those documented on Notification Message Forms or Short Message Forms and Notification to U.S. Coast Guard/Union Pacific Railroad); and may be used to document:
 - 5.2.1.1 Messages transmitted between Entergy Emergency Response Facilities;
 - 5.2.1.2 Requests for information that are routed within a facility.
 - 5.2.1.3 The messages described in subsection 5.2.1.1 and 5.2.1.2, above, may also be documented using the Facility Log or Emergency Telephone/Radio Log.
- 5.2.2 Each Communication Log will be given a sequential number in accordance with the following guidelines.
 - 5.2.2.1 The Emergency Communicator, TSC Lead Communicator or EOF Communications Coordinator will control the numbering of all Communications Logs.
 - 5.2.2.2 Each key emergency position (HPC, OSC Supervisor, Administration/Logistics Coordinator, etc.) will control the numbering of Communications Logs originating from their position.

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- 5.2.3 In addition to the message, each Communications Log will contain the following information:
 - Message Number (MESSAGE NO Block)
 - Agency, or person, receiving the message (MESSAGE TO Block)
 - Agency, or person, transmitting the message (MESSAGE FROM Block)
 - Date and Time message transmitted or received (TIME/DATE SENT or TIME/DATE RECEIVED Block)
 - Number at which the calling agency, or person, can be reached (CALLBACK NUMBER(S) Block).
 - Signature of person transmitting/receiving the message (TRANSMITTED/RECEIVED BY Block)
 - Signature of the Emergency Coordinator/EOF Director, if the message is being transmitted to a non-Entergy Agency (AUTHORIZED BY Block)
- 5.2.4 The three (3) copies of the Communications Logs are to be routed and/or retained as indicated (in red) on the bottom of each page of the printed form.

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5.3 Facility Logs

NOTE

Refer to the example Facility Log, Attachment 7.3.

- 5.3.1 A position specific narrative Facility Log, Attachment 7.2, should be maintained for each emergency responder listed in Attachment 7.4.
 - 5.3.1.1 Those emergency positions who maintain a narrative plant log as part of their normal operating duties (i.e., Shift Superintendent, Radiological Controls Coordinator, Security Shift Supervisor) may continue to use their narrative plant log for emergency activities in lieu of a Facility Log.
 - 5.3.1.2 Those emergency positions whose main duties involve frequent telephone/radio communications with other members of the Onsite and/or Nearsite Emergency Organizations, may use the Emergency Telephone/Radio Log, Attachment 7.5.
- 5.3.2 The following information should be included on each page of the Facility Log:
 - 5.3.2.1 Date written in the form MM/DD/YY
 - 5.3.2.2 Print the name of the person maintaining the log
 - 5.3.2.3 Page number
 - 5.3.2.4 Circle the facility or fill in the OTHER blank
 - 5.3.2.5 Print the emergency position for which the log is being maintained. (For example: if the EOF Logkeeper is maintaining a log for the EOF Director, then "EOF Director" will be entered in the blank)
 - 5.3.2.6 Logkeeper's signature as each page is completed

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- 5.3.3 The initial entry should include, as a minimum:
 - 5.3.3.1 The time at which the log was initiated
 - 5.3.3.2 Name of the person the log is being maintained for (if different than the person maintaining the log)
 - 5.3.3.3 Emergency Classification
 - 5.3.3.4 Summation of plant conditions
- 5.3.4 Log entries will be made in accordance with the guidelines for basic logkeeping as outlined in Section 5.1.

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5.4 EMERGENCY TELEPHONE/RADIO LOG

NOTE

Refer to the Emergency Telephone/Radio Log Example, Attachment 7.6.

- 5.4.1 An Emergency Telephone/Radio log may be maintained, in lieu of a Facility Log, for frequent telephone/radio communications.
- 5.4.2 Individuals responsible for maintaining a Facility Log may choose to maintain an Emergency Telephone/Radio Log as well, but there is no need to document communications entries on both.
- 5.4.3 The Emergency Telephone/Radio Log should <u>not</u> be used to document communications with offsite agencies (except for communications with NRC).
- 5.4.4 The Emergency Telephone/Radio Log may also be used in lieu of a Communications Log to document facility messages.
- 5.4.5 The following information should be included on each page of the Emergency Telephone/Radio Log:
 - 5.4.5.1 Date written in the form MM/DD/YY
 - 5.4.5.2 Logkeeper print the name of the person maintaining the log
 - 5.4.5.3 Page number
 - 5.4.5.4 Circle the facility for which the log is being maintained
 - 5.4.5.5 Print the emergency position or the purpose for which the log is being maintained. (For example: <u>if</u> a person is assigned to maintain communications with the OSC repair teams, t<u>hen</u> "Repair Team Communications" would be entered in the blank.)

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5.4.5.6 Message From - the person or organization initiating the conversation

5.4.5.7 Message To - the person or organization receiving the message

5.4.5.8 Time

5.4.5.9 Summary of Message - Provide a summary account of the major items of conversation

5.4.5.10 Logkeeper's signature as each page is completed

Emergency Plan Implementing Procedure Emergency Plan Implementing Records

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6.0 FINAL CONDITIONS

- 6.1 DISPOSITION OF DOCUMENTATION
 - 6.1.1 Collect all documentation generated in the operation of the emergency facility.
- 6.1.2 Forward the collected documentation to the Emergency Planning Coordinator for review.

7.0 ATTACHMENTS

- 7.1 Communications Log
- 7.2 Facility Log
- 7.3 Facility Log Example
- 7.4 Positions Required to Maintain Emergency Logs
- 7.5 Emergency Telephone/Radio Log
- 7.6 Emergency Telephone/Radio Log Example

8.0 RECORDS

- 8.1 The following records are generated as a result of this procedure:
 - Attachment 7.1, Communications Log
 - Attachment 7.2, Facility Log
 - Attachment 7.5, Emergency Telephone/Radio Log

COMMUNICATIONS LOG

MESSAGE NO:	
MESSAGE TO:	DATE/TIME SENT:
MESSAGE FROM:	DATE/TIME RECEIVED:
CALLBACK NUMBER(S):	
MESSAGE:	
TRANSMITTED/RECEIVED BY:	
AUTHORIZED BY (If sent to non-Entergy Agency):	
REPLY/ACTION TAKEN:	
	DATE/TIME
TRANSMITTED BY:	TRANSMITTED:
AUTHORIZED BY (If sent to non-Entergy Agency):	•

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THIS COPY FOR ACTION

Page 1

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Attachment 7.1 (1 of 1)

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FACILITY LOG

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DATE:	11	LOGKEEPER:			PAGE	1_ OF
	, <u></u>			inted Name		
FACILITY (CII	RCLE ONE):	Control Room	TSC	OSC	-4 Control Point	EOF
		Other:			-	
This log docur	ments the activiti	es of the				
				Print	Emergency Position	
Time			Event Des	cription		
					· · · · · · · · · · · · · · · · · · ·	
			<u> </u>			
	<u> </u>					<u> </u>
						
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			· .		•	
<u></u>						

Logkeeper Signature

Attachment 7.2 (1 of 1)

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FACILITY LOG (EXAMPLE)

DATE: 06	/ <u>30</u> / <u>93</u> LOGKEEPER:	Jane Doe	PAGE 1 OF 6			
		Printed Name				
FACILITY (CII	RCLE ONE): Control Room Other:	TSC OSC	-4 Control Point EOF			
This log docur	nents the activities of the	Emerg	ency Coordinator			
		Print	Emergency Position			
Time		Event Description				
0912	Initiated the Emergency Coordinator	(EC) log. Joe Man	ager is the Emergency			
	Coordinator.	• •				
	The following events occurred prior to initiation of this log: An Alert was declared at					
	0832 due to a primary to secondayr leak of 12 gallons per minute (gpm). The leakage					
	appears to be tube leakage in the $\#2$. Steam Generator. I	he alert was declared based on			
	Stitiating Condition B/A/SS. The Duty Plant Manager (DPM) was notified of the					
· · · · · · · · · · · · · · · · · · ·	Alert Declaration at 0835.					
0915	OSC Supervisor reports that the OS	C is staffed and activa	ted.			
0917	Control Room reports the loss of the "A" charging pump. The "A/B" charging pump					
	has been started but pressurizer level	is still decreasing. A	ppears the leakage has increased.			
0920	EC directed the ISC Supervisor to h	ave the OSC dispatch	a repair team to investigate the			
	charging pump failure.					
L.E. 0919	EC declared Lite Area Emergency (LAE) due to RCL leakage greater than charging pump					
	capacity (Initiating Condition B/SA	\mathcal{E}/\mathcal{I}). HPC recomm	ends evacuating to Monsanto			
	Park.					
0924	Operational Hotline members notified	of BAE declaration (Message Number I-3).			

Jane Doe

Logkeeper Signature

Attachment 7.3 (1 of 1)

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POSITIONS REQUIRED TO MAINTAIN EMERGENCY LOGS

CONTROL ROOM

Emergency Coordinator (SS)* CRS* NPO* Emergency Communicator

TECHNICAL SUPPORT CENTER

Emergency Coordinator TSC Supervisor/TSC Supervisor's Communicator Lead Engineer Operations Coordinator Health Physics Coordinator Lead Communicator Nuclear Engineer Mechanical Engineer Electrical Engineer Chemistry Engineer Dose Assessment Coordinator Dose Assessment Communicator

EMERGENCY OPERATIONS FACILITY

EOF Director/EOF Logkeeper Radiological Assessment Coordinator Operations/Engineering Coordinator Offsite Technical Advisor/Offsite Technical Assistant Administration/Logistics Coordinator Communications Coordinator Licensing Coordinator Nuclear Engineer Electrical Engineer Bechanical Engineer I&C Engineer Field Team Controller Field Team Communicator Entergy System Liaison

OPERATIONAL SUPPORT CENTER

OSC Supervisor/OSC Supervisor Communicator Radiological Controls Coordinator* HP Liaison (assigned to OSC)* OSC Information Technology Representative OSC Electrical Lead OSC I&C Lead OSC Mechanical Lead OSC Supervisor Assistant Security Superintendent*

SECURITY

Security Shift Supervisor*

* - denotes those positions which may use normal plant logs in lieu of Facility Logs.

EMERGENCY TELEPHONE/RADIO LOG	
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DATE:/_		LOGKEEPER:			PAGE	OF
			 (PRINT NAM	E)		
FACILITY:		L ROOM			L POINT	
	D EOF					

THIS LOG DOCUMENTS COMMUNICATIONS FOR

(POSITION OR FUNCTION)

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MESSAGE FROM	MESSAGE TO	TIME	SUMMARY OF MESSAGE
	,		
			· 、
			· · · · · · · · · · · · · · · · · · ·

LOGKEEPER SIGNATURE

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Attachment 7.5 (1 OF 1)

EMERGENCY TELEPHONE/RADIO LOG

DATE: 06/30/	93	LOGKEEPER:	Telly Phone (PRINT NAME)		PAGE <u>1</u> OF <u>10</u>
FACILITY:		NTROL ROOM	тяс 🛛	osc 🗆	-4 CONTROL POINT
		F D OTHER			<u></u>
THIS LOG DOC	UMENT	S COMMUNICATIONS	FOR	Repair I	Ieam Communications
				(POSIT	ION OR FUNCTION)
MESSAG	E	MESSAGE			
FROM		то	TIME	ડા	JMMARY OF MESSAGE
Repair Ieam	# 1	0 <i>8C</i>	1312	Arrived at L to troubleshoo	PSI Pump "B" Commencing t.
Repair Ieam	#3	ØSC	1316		for accountability still in rp "A"_room.
0.\$ <i>C</i>		Repair Jeam #2	1319	Report back i	to OBC for further instructions.
ЕЭДЈ		03C	1 320	Arrived at	7 RAB. Ready to respond.

Telly Phone

LOGKEEPER SIGNATURE

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Attachment 7.6 (1 of 1)

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