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Procedure Manual - CP-SP-520, Rev. 4

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Transition and Recovery

Revision 4

Effective Date: 12-31-99

SAFETY RELATED

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1.0 PURPOSE

This procedure provides guidance for the transition into, conduct of operations while in, and termination of the recovery phase of a classified emergency event involving the implementation of the Pilgrim Nuclear Power Station (PNPS) Emergency Plan.

2.0 REFERENCES

- 2.1 EP-PP-01, "PNPS Emergency Plan"
- 2.2 PNPS Procedure 1.3.63, "Conduct of Critiques and Incident Investigations"

3.0 DEFINITION

- 3.1 Critiques - A fact-finding meeting with the individuals involved in the occurrence to review the event(s), cause(s) and action(s) leading up to and through the declaration of an emergency.
- 3.2 Detailed Incident Report - A written report that summarizes the facts and assigns corrective actions. The report includes the facts of the emergency, describes the root cause(s) of any emergency response problems and recommends corrective actions.
- 3.3 Initial Incident Report - A written report summarizing the incident prepared for delivery to offsite authorities (NRC, State and local). This report is required within 24 hours of terminating an Unusual Event and within 8 hours of terminating any higher event.
- 3.4 Investigation - An investigation is conducted to evaluate the event causes, actions and response each time the emergency plan is implemented. This will be accomplished by a close examination of the facts through critique(s), interviews, and a review of pertinent documentation and logs.
- 3.5 Recovery - The classification describing the plant status and organization which occurs after the emergency situation has been controlled/corrected and the event has been terminated. Recovery consists of the actions required to restore the plant to its pre-incident condition or to place the plant into a safe, long term shutdown.
- 3.6 Termination - The point at which the event is no longer considered to be an emergency. Termination of the emergency is formally identified by an Initial Notification message transmission and entry into Recovery.

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3.7 Transition - The passage from the emergency phase into the recovery phase of an accident. Transition is the period of time following the stabilization of the emergency when plans and personnel, necessary to the recovery, are developed and identified. Transition activities are performed while in a classified event. That is, the emergency can not be terminated until a Recovery Plan has been developed and a Recovery Organization is identified and in place.

4.0 RESPONSIBILITIES

4.1 The Emergency Director is responsible for determining when conditions support termination of the emergency and when entry into Recovery shall occur.

4.2 The Recovery Director has overall authority and is responsible for the coordination and direction of the activities of the Recovery Organization, and approval of all reports submitted to offsite authorities.

4.2.1 The Vice President/Station Director, or a designated alternate, shall become the Recovery Director following events of an Alert or higher classification.

4.2.2 The Operations and Plant Management Director, or on-call Operations and Plant Management Director, shall ensure recovery actions are completed following events classified as an Unusual Event.

4.3 The Operations and Plant Management Director, or a designated alternate, shall become the Recovery Plant Manager and be responsible for recovery operations specific to the plant and plant systems.

4.4 The Nuclear Assessment Director, or a designated alternate, shall become the Recovery Offsite Manager and be responsible for overseeing all Pilgrim Station actions to aid offsite recovery activities and preparation of reports on the event.

4.5 The Company Spokesperson, or a designated alternate, is responsible for coordinating with offsite agencies in determining the need for continued Media Center operations to meet the public and news media needs during Recovery.

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5.0 PROCEDURE

5.1 Transition and Recovery Following an Unusual Event

NOTE

This section is not applicable for events which are terminated from an Unusual Event following downgrading from a higher classification level. The steps described in Sections 5.2 and 5.3 shall be used whenever the classification level has exceeded an Unusual Event.

5.1.1 The Emergency Director (Operations Shift Superintendent) shall:

- A. Complete and distribute an Initial Notification Form, EP-IP-100 Attachment 6, to signify entry into Recovery.
- B. Concurrent with offsite notification, announce the following message to station personnel over the public address system:

"Attention all personnel, attention all personnel. The emergency has been terminated and we have entered Recovery. I repeat, the emergency has been terminated and we have entered Recovery."
- C. Notify the ERO of the decision to terminate the emergency and enter into Recovery per EP-IP-100, Attachment 10, "Activation of the ERO."
- D. Notify the Operations and Plant Management Director or the On-Call Operations and Plant Management Director upon entry into Recovery from an Unusual Event.

5.1.2 The Operations and Plant Management Director or On-Call Operations and Plant Management Director shall:

NOTE

At the discretion of the Operations and Plant Management Director or On-Call Operations and Plant Management Director, the start of the recovery activities following an Unusual Event may be delayed until the next morning.

- A. Ensure the NRC, Commonwealth and local authorities receive or have received the Initial Incident Report documentation (prepared in accordance with Attachment 1) within 24 hours of the event termination.
- B. In coordination with the Nuclear Assessment Director conduct an investigation and develop a Detailed Incident Report in accordance with Attachment 1.

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- C. In coordination with the Nuclear Assessment Director, ensure that identified corrective actions are assigned to appropriate Nuclear Organization Departments and a method is established for tracking items to completion.

5.2 Transition following an Alert or Higher Classification

5.2.1 As conditions improve and additional personnel and resources become available, certain recovery activities may be initiated prior to termination of the emergency. The process for transition to recovery is illustrated in Attachment 3.

5.2.2 The Emergency Director shall:

- A. Maintain all Emergency Response Facilities at or near full staffing until a Recovery Plan Outline describing the necessary Recovery Organization has been approved (see Attachment 5).
 - 1) For events of the Alert classification, the Emergency Response Organization personnel may be adequate to perform necessary recovery actions prior to returning to the normal PNPS Organization.
 - 2) For event classifications of Site Area or General Emergency , the basic Recovery Organization (as illustrated in Attachment 4) shall be established. Additional positions may be assigned to perform recovery specific activities.

NOTE

Detailed plans and procedures are not required to be developed prior to event termination and entry into Recovery. However, a Recovery plan outline must be completed and the recovery organization management positions identified and ready for staffing.

- B. Direct the Emergency Plant Manager, the Emergency Offsite Manager and the Company Spokesperson to each develop an Issues/Strategies Package and determine the Recovery Organization staffing requirements (See Attachments 5-8 for guidance).
- C. Convene a joint Emergency Managers meeting to review the Recovery Issues/Strategies Packages, review the Recovery Organization staffing requirements and develop and approve the Recovery Plan outline.
- D. Conduct a formal meeting with regulatory and Commonwealth authorities to ensure coordination and agreement is met for entry into Recovery.

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- E. Complete and distribute an Initial Notification Form, EP-IP-100 Attachment 6, to signify entry into Recovery.
- F. Concurrent with offsite notification, announce or direct the announcement of the following message to station personnel over the public address system:

“Attention all personnel, attention all personnel. The emergency has been terminated and we have entered Recovery. I repeat, the emergency has been terminated and we have entered Recovery.”
- G. Notify the ERO of the decision to terminate the emergency and enter into Recovery per EP-IP-100, Attachment 10, “Activation of the ERO.”

5.3 Recovery following an Alert or Higher Classification

- 5.3.1 Selected emergency response facilities or portions thereof may remain activated for some time after event termination during Recovery (For example, the Media Center, PPC).
- 5.3.2 Existing plant procedures, or procedures developed for specific tasks shall be used for plant repair activities during Recovery. Special procedures developed for use during Recovery shall be approved by the Recovery Plant Manager.
- 5.3.3 Non-emergency (10 CFR 20) limits and controls for radiation exposure shall apply to repair activities conducted during Recovery. See existing plant exposure control procedures for guidance.
- 5.3.4 The Recovery Director shall:
 - A. Direct preparation and delivery of an Initial Incident Report per Attachments 1 and 2 to offsite authorities (NRC, Commonwealth, and local). This report is required within 8 hours of terminating any event or series of events which reach an Alert classification or higher.
 - B. Direct and/or coordinate all actions of the Recovery Organization, and approve any reports released to offsite authorities.
 - C. Continue to develop and direct the activities of the Recovery Plan and supporting procedures.
 - D. Continue verification and approval of information released by Public Information which pertains to the emergency or recovery from the event.

5.3.2 The Recovery Plant Manager shall direct the following as required:

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- A. Continue to identify and document issues relating to recovery operations using Attachments 5 and 6.
- B. Construction and implementation of the detailed Recovery Plan and procedures for onsite activities.

5.3.3 The Recovery Offsite Manager shall direct the following as required:

- A. Continue to identify and document issues relating to recovery operations using Attachments 5 and 7.
- B. Construction and implementation of the detailed Recovery Plan and procedures for offsite activities.
- C. Liaison with offsite agencies and coordinating PNPS assistance for offsite recovery activities.
- D. Coordination of PNPS environmental sampling activities. The Offsite Radiological Supervisor shall be assigned the primary responsibilities for coordinating this activity.
- E. Development of a radiological release report including estimation of the projected population exposure (Attachment 9 should be used for guidance) as applicable.

5.3.3 The Company Spokesperson shall direct the following as required:

- A. Continue to identify and document issues relating to recovery operations using Attachments 5 and 8.
- B. Construction and implementation of the detailed Recovery Plan and procedures for Public Information activities.

5.4 Exit From Recovery

5.4.1 For any event or series of events which did not exceed an Unusual Event, the Operations and Plant Management Director shall ensure the following:

- A. Incident reports have been developed, approved and issued.

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- B. Corrective items are assigned to the responsible organizations.
- C. The plant has been returned to pre-incident conditions.

5.4.2 For any event or series of events which reached an Alert classification or higher, the Recovery Director shall ensure the following:

- A. Incident reports have been developed, approved and issued.
- B. All onsite and offsite organizations involved with the emergency and the recovery have been apprised of the existing conditions and of the anticipated termination of activities.
- C. The news media have received a final status report on the emergency and recovery operations.
- D. The emergency response facilities are no longer required, and actions have commenced to restore them to their pre-emergency condition.
- E. A thorough review of all actions taken during the emergency and recovery phases has been conducted and a Detailed Incident Report prepared following the guidance provided by Attachment 1, "Incident Report Guidelines."
- F. Necessary revisions of the PNPS Emergency Plan and Implementing Procedures have been identified to the Nuclear Assessment Group.

6.0 RECORDS

- 6.1 The following documents are generated as a result of the implementation of this procedure:
 - 6.1.1 Initial and Detailed Incident Reports
 - 6.1.2 Recovery Issues/Strategies Packages
 - 6.1.3 Recovery Plan and supporting procedures (if developed)
 - 6.1.4 Special reports generated per the Recovery Plan if a formal plan is developed.
 - 6.1.5 Total Population Exposure Worksheet (if required)
- 6.2 All documents shall be submitted to the Recovery Director who shall forward them to the Nuclear Assessment Director.

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7.0 ATTACHMENTS

- 7.1 Attachment 1, Incident Report Guidelines
- 7.2 Attachment 2, Sample - Initial Incident Report
- 7.3 Attachment 3, Illustrated Recovery Process
- 7.4 Attachment 4, Typical Recovery Organization
- 7.5 Attachment 5, Recovery Plan Outline & Issues/Strategies Guide
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- 7.11 Attachment 11, Identification of Commitments

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Attachment 1, Incident Report Guidelines

The purpose of this attachment is to provide guidelines for the conduct and documentation of investigations following a classified emergency event. Each time the emergency plan is implemented, the event and the response to the event will be evaluated to identify any weaknesses or problems with emergency response performance, plan or procedures. Two types of reports will be generated, an "Initial Incident Report" immediately following termination of an event and a "Detailed Incident Report" generated during the recovery phase.

I. Initial Incident report

- A. For incidents involving only an Unusual Event, the Initial Notification Forms (for the UE classification and entry into Recovery) serve as the Initial Incident Report used to notify the offsite authorities. The NRC, State and local authorities must receive or have received the Initial Incident Report documentation within 24 hours of the event termination.
- B. Incidents classified as an Alert or higher emergency level require preparation and transmittal of an initial incident report. An "Initial Incident Report" will be prepared using the guidelines provided in Attachment 2.
 1. The Initial Incident Report should be reviewed by the Recovery Offsite Manager and the Recovery Plant Manager prior to submittal.
 2. The Recovery Director will review and approve the report prior to transmittal to offsite authorities.

II. Detailed Incident Report

- A. Conduct an investigation as soon as possible following termination of the event (to include a formal critique) to review all actions taken during the emergency.
 - Review all applicable logs and documentation to reconstruct the event.
 - The critique will be conducted in accordance with PNPS NOP 1.3.63, "Conduct of Critiques and Incident Investigations." Individuals attending the critique should be those individuals involved with the initiating conditions, key emergency response personnel and representatives from Operations, Systems, Nuclear Assessment and other groups as required.
- B. Write a report of the event. The report will be sent to the Vice President/Station Director. Copies of the report will be distributed in accordance with PNPS NOP 1.3.63.

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Attachment 2, Sample - Initial Incident Report

TO: Offsite Authorities (NRC, Local, and State) Date: _____

Time: _____

From: _____, Recovery Director

Subject: Incident Report of Emergency Declared at Pilgrim Nuclear Power Station

The Pilgrim Nuclear Power Station has terminated from emergency status at (time) hours and has entered into Recovery.

The following is a review of events and items pertaining to (Indicate EAL and Type) reported on (date).

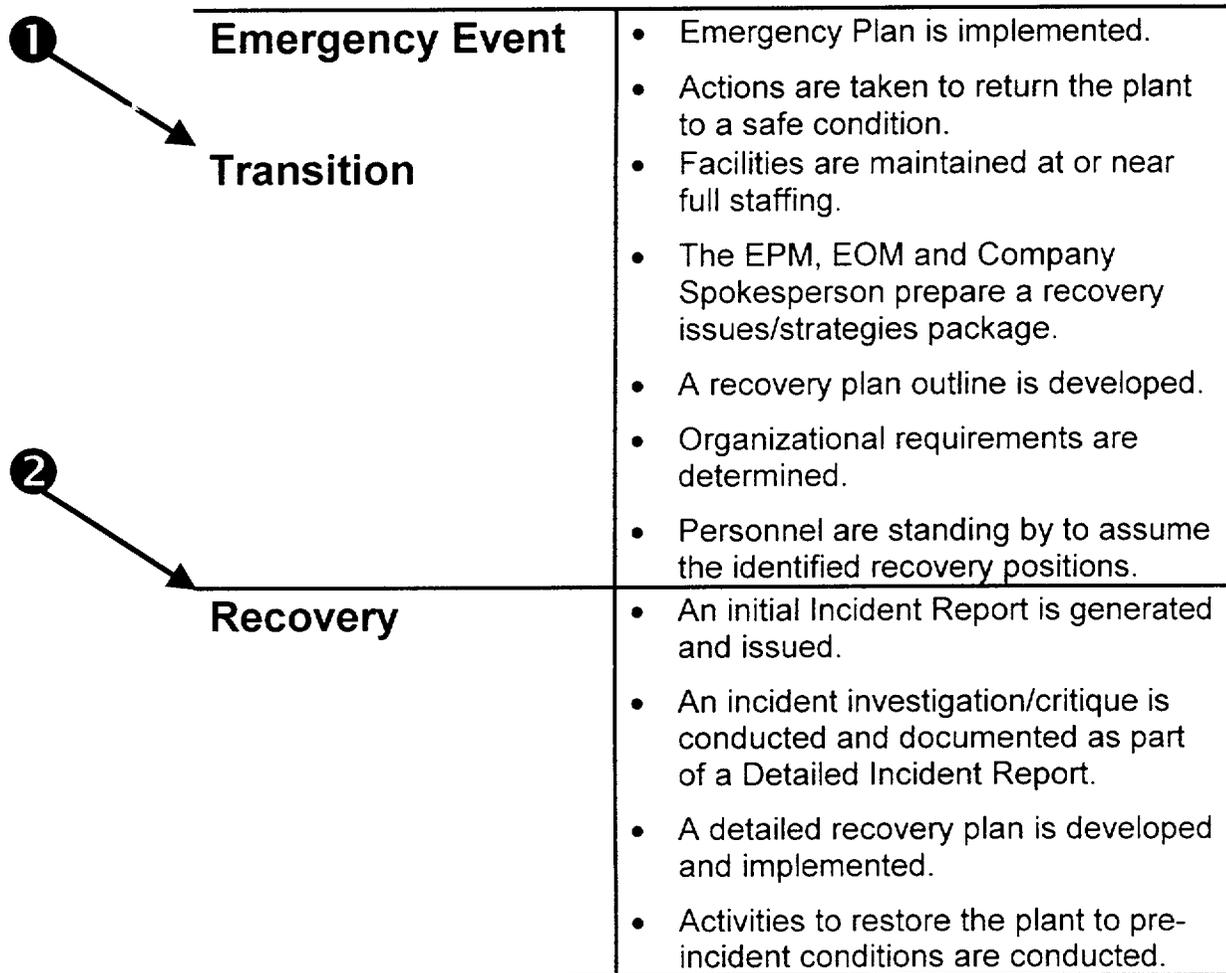
Provide a narrative of the incident (a description of the event giving the facts of the emergency). Include the following as a minimum:

1. Time and description of initiating events (i.e., "On July 4, 1996, at 0640 hours a bomb threat was received at....."). Include information on injuries and status as you may know **(DO NOT INCLUDE NAME(S) OF VICTIMS UNLESS THE FAMILY HAS BEEN NOTIFIED)**.
2. Performance of initial notifications to offsite authorities, to include time, location and mode of notification (i.e., ENS, DNN, BECONS, telephone).
3. Request for offsite assistance, including time and type.
4. The magnitude of any radiological release and Protective Action Recommendation information as applicable.

Signature: _____
Recovery Director

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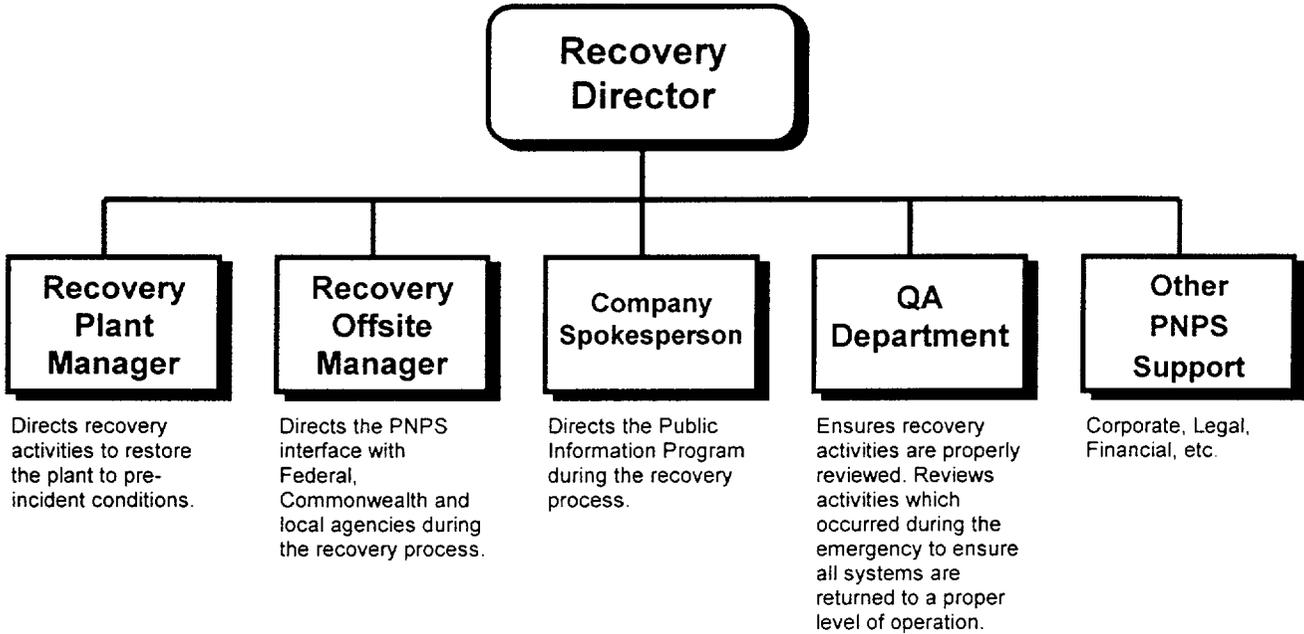
Attachment 3, Illustrated Recovery Process



- ❶ The initiating state of emergency no longer exists (Termination Checklist is approved).
- ❷ Formal termination of the emergency occurs (Initial Notification of Recovery approved and transmitted).
Emergency dose limits and special exceptions to procedures no longer apply.
Organizational titles are changed to reflect the new status.

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Attachment 4, Typical Recovery Organization



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Attachment 5, Recovery Plan Outlined Issues/Strategies Guide

Recovery Plan Outline:

SECTION I. RECOVERY ORGANIZATION

- A. Organization structure
- B. Assignment of authorities/responsibilities

SECTION II. ONSITE RECOVERY PROGRAM

- A. Issues and Strategies

SECTION III. OFFSITE RECOVERY PROGRAM

- A. Issues and Strategies

SECTION IV. QUALITY ASSURANCE OVERSIGHT PROGRAM

- A. Quality Assurance role in recovery
- B. Other oversight committees roles in recovery

Issues/Strategies Format Guide:

<u>Area</u>	<u>Owner</u>	<u>Safety Rel.</u>	<u>Priority</u>	<u>Duration</u>	<u>Man-hours</u>
<u>Description of Issue</u>					

Area: Onsite or Offsite

Owner: Responsible individual or organization

Safety Related: Yes or No

Priority: 1 = Immediate (24 hr.) 2 = Short Term (1 Week)
3 = Intermediate(1 Month) 4 = Long Term (> 1 Month)

Duration: Estimated Calendar Duration

Man-hours: Estimated Total Project Hours

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Attachment 6, Onsite Issues/Strategies Guide

1. When directed, convene a meeting of key station Emergency Response Organization (ERO) personnel. It is suggested as a minimum the following members attend:

- Emergency Plant Manager
- TSC Supervisor
- OSC Supervisor
- Onsite Radiological Supervisor
- Emergency Plant Operations Supervisor

2. Review existing conditions, outline the onsite issues to be resolved, and develop a Issues/Strategies Package which will form the basis for the onsite portion of the station's Recovery Plan. Issues which should be considered in the formation of the package should include:

A. PRESENT ACTIVITIES BEING PERFORMED BY STATION STAFF

- Identify ongoing activities and determine the need to continue

B. EQUIPMENT STATUS VERIFICATIONS

- Perform/Document secured lineups
- List/Identify inoperable equipment
- Hang appropriate tagouts
- Document temporary repairs/lineup
- Obtain PASS samples to verify core status

C. STABILIZATION OF PLANT FOR LONG TERM COOLING

- Identify present cooling lineup(s)
- Document available back-up cooling lineup(s)
- Confirm condition of RHR/RBCCW/TBCCW/RWCU/SSW/CS
- Develop a plan to transition to long term cooling

D. SYSTEM REPAIRS AND RESTORATIONS

- Prioritize out of service equipment for restoration
- Plan restoration process by milestones
- Determine testing to increase/ensure equipment reliability
- Determine long term resolution of temporary repairs
- Examine options for temporary systems
- Bring in industry expertise (i.e. INPO, NRC, G.E., TMI, etc.), as necessary
- Insure proper QA on any repairs made during the emergency or redo repairs

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Attachment 6, Onsite Issues/Strategies Guide (Cont.)

E. RADIOLOGICAL CONTROLS AND AREA DECONTAMINATION

- Perform comprehensive surveys of on site areas
- Establish additional survey and sampling frequency requirements
- Determine if additional monitoring equipment is required
- Develop a decontamination plan based on prioritized recovery of plant areas
- Commence bioassay program
- Contract for large volume decontamination equipment/expertise

F. WATER MANAGEMENT

- Identify sources, volumes and activity levels of clean and waste water inventories
- Prioritize clean-up
- Verify/evaluate condition of existing clean-up systems
- Establish tagout/controls to preclude inadvertent discharges
- Evaluate the need to contract portable filtering systems/expertise
- Establish berm and backup restraints for control and mitigation of spills.
- Evaluate the need for additional onsite waste storage capability
- Evaluate the need for additional burial space for waste

G. LOGISTICS

- Identify manpower needs
- Obtain (if necessary) damage control equipment
- Consider use of outside specialist (TMI, G.E., etc.)
- Set up training for off normal conditions (ALARA)
- Consider restricting site access
- Order extra H.P. supplies to support recovery
- Evaluate the need for additional security (crowd control)
- Evaluate the need for remote technology expertise for inspections and cleanup
- Evaluate the need for additional communications capabilities

H. DOCUMENTATION

- Develop onsite portions of Detailed Incident Report
- Develop onsite recovery plan (short/long term)
- Write special procedures to perform task outside normal procedures scope

I. OTHER

- Any item which does not fall into one of the listed categories.

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Attachment 7, Offsite Issues/Strategies Guidelines

1. When directed, convene a meeting of key EOF Emergency Response Organization (ERO) personnel. It is suggested as a minimum the following members attend:
 - Emergency Offsite Manager
 - Communications Supervisor
 - Logistics Supervisor
 - Offsite Radiological Supervisor
 - Emergency Offsite Manager's Administrative Assistant

2. Review existing conditions, outline the issues to be resolved, and develop an Issues/Strategies Package which will form the basis for the offsite portion of the Recovery Plan. Issues which should be considered include:
 - A. PRESENT ACTIVITIES BEING PERFORMED BY STATION STAFF**
 - Identify ongoing activities and determine the need to continue

 - B. RADIOLOGICAL**
 - Evaluate the need for an environmental sampling program
 - If required, estimate total population dose
 - Evaluate clean-up requirements
 - Evaluate the need to bring in outside expertise for radiological monitoring

 - C. SUPPORT TO OFFSITE AUTHORITIES**
 - Consider outstanding requests from local, State and Federal authorities
 - Keep offsite authorities apprised of onsite conditions and activities

 - D. CORPORATE INTERFACE**
 - Keep corporate management apprised of conditions and activities
 - Provide Information to legal organization as requested
 - Identify issues applicable to Human Resources and Employee Assistance

 - E. LOGISTICS**
 - Identify manpower needs to support offsite recovery activities
 - Identify all non PNPS personnel activities currently in place
 - Review equipment and material needs for EOF recovery activities
 - Assist the onsite and PI organizations in obtaining offsite support
 - Evaluate the need for additional communications capabilities

 - F. DOCUMENTATION**
 - Direct that an Initial Incident Report be prepared
 - Develop offsite portions of Detailed Incident Report
 - Develop offsite recovery plan (short/long term)

 - G. OTHER**
 - Any item which does not fall into one of the listed categories.

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Attachment 8, Public Information Issues/Strategies Guide

1. When directed, convene a meeting of key Public Information Emergency Response Organization personnel. It is suggested as a minimum the following ERO members attend:
 - Company Spokesperson
 - Media Center Supervisor
 - Agency Coordinator

2. Reviewing existing conditions, outline the public information issues to be resolved, and develop Issues/Strategies Package which will form the basis for the public information portion of the station's Recovery Plan. Issues which should be considered in the formation of the package should include:
 - A. **PRESENT ACTIVITIES BEING PERFORMED BY MEDIA CENTER STAFF**
 - Identify ongoing activities and determine the need to continue

 - B. **DOCUMENTATION**
 - Develop the public information portion of the recovery plan

 - C. **OTHER**
 - Any item which does not fall onto one of the listed categories

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Attachment 9, Total Population Projected Exposures

This attachment is used during Recovery to estimate the projected population exposure (whole body and/or thyroid) from radioactive materials released from the plant during the immediate (plume) phase of the accident. It is to be used only after the release has terminated. These calculations estimate the cumulative dose based on worst case conditions (i.e., all persons within the subarea standing in the open at plume centerline concentrations for the entire period of exposure). Additionally, it is initially based on projected, rather than measured, dose rates. As such, the estimates may be extremely conservative. Persons analyzing these data should consider the effects of sheltering and evacuation as well as data from Radiation Monitoring Teams and environmental TLDs to obtain a more accurate estimate.

Using the Projected Population Exposure Worksheet for each affected subarea:

- A. Determine and record the time interval for each release segment.
- B. Convert and record the time interval to an hourly decimal value (e.g., (1015 - 1000) / 60 = 0.25).
- C. Perform dose assessments to obtain the maximum centerline whole body and/or thyroid dose rates from each release point for each time interval for each affected subarea. Record in the appropriate cell.
- D. Multiply the dose rate values by the duration and record the dose in the appropriate cells.
- E. Sum the whole body and thyroid dose columns to obtain the individual dose in the page total box and record results.
- F. Determine the number of persons in the affected subarea and record in the page total box. Population information can be found in the Emergency Plan Appendix E, "Evacuation Time Estimates," Table 2-17 for subareas 1 through 11 and Table 2-9 for subarea 12.
- G. If there is more than one page of subarea exposure data, maintain the cumulative totals box for the extent of the worksheets.
- H. Values for each subarea can be added together to determine the total population exposure for the entire EPZ.

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Attachment 10, Document Cross-Reference

This attachment lists those documents, other than source documents, which may be affected by changes to this procedure.

Document Number	Document Title
EP-IP-100	Emergency Classification & Notification

PNPS	PNPS Emergency Plan Implementing Procedure Manual	Number: EP-IP-520
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Attachment 11, Identification of Commitments

This attachment lists those external commitments (i.e., NRC commitments, QA audit findings, and INPO inspection items) implemented in this procedure.

Reference Document	Commitment	Affected Section(s)
NRC Inspection Finding 81-15-48	Clarify the organizational authority responsible for the decision to enter the recovery phase.	4.1
QA Audit Report 87-48 DR 1722, Issue 4	Define persons responsible for termination of the emergency situation and entry into the recovery phase.	4.0
QA Audit Report 87-48 DR 1723, Issue 10	Establish a procedural methodology for the estimation of total population exposure following a release of radioactivity from the plant.	Attachment 9