Document Update Notification

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ADDRESS:	DOC CNTRL DESK MAIL STOP OP1-17 WASHINGTON DC 20555
DOCUMENT NO:	OP-1905.001
TITLE:	EMERGENCY RADIOLOGICAL CONTROLS
REVISION NO:	013-00-0
CHANGE NO:	AP-13
SUBJECT:	NEW REVISION

If this box is checked, please sign, date, and return transmittal in envelope provided.

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ANO-2 Docket 50-368

Signature

Date



ENTERGY OPERATIONS INCORPORATED ARKANSAS NUCLEAR ONE

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TITLE: EMERGE	NCY RADIOLOGICAL CONTROLS	PROC/WORK PLAN NO.	CHANGE NO. 013-00-0		
		1905.001 WORK PLAN EXP. DATE	TC EXP. DATE		
		N/A	N/A		
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-	Time Pressure	Self Check			
	Distraction/Interruption	Peer Check			
	Multiple Tasks	3-Part Comn	nunication		
	Over Confidence	Pre-Evolutio	n Briefs		
	Vague or Interpretive Guidance	Knowledge			
	First Shift/Last Shift	Placekeepin	g		
	Peer Pressure	STAR Procedures			
	Change/Off Normal	Procedures			
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FORM TITLE:	DESCRIPTION	I OF CHANGE		FORM NO. 1000.006C	CHANGE NO. 047-04-0
3.4	Added commitme	nt numbers			
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TYPE OF CHANGE: NEW Procedure or Work Pla AFFECTED SECTION:			TC EXP. DATE: ach change made, inclu		
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1.0 PURPOSE

This procedure provides guidance for the following radiological control practices during emergency situations:

- 1.1 Personnel Monitoring.
- 1.2 Respiratory Protection.
- 1.3 Contamination Control.

2.0 SCOPE

- 2.1 This procedure is applicable during Alert, Site Area or General Emergency conditions.
- 2.2 This procedure applies to ANO emergency support personnel and emergency response facilities within the ten mile Emergency Planning Zone.

3.0 REFERENCES

- 3.1 REFERENCES USED IN PROCEDURE PREPARATION.
 - 3.1.1 Emergency Plan.
 - 3.1.2 1903.043, "Duties of the Emergency Radiation Team".
 - 3.1.3 1000.031, "Radiation Protection Manual".
 - 3.1.4 1903.033, "Protective Action Guidelines For Rescue/Repair and Damage Control Teams"
 - 3.1.5 1903.023, "Personnel Emergency"
 - 3.1.6 1012.019, "Radiological Work Permits"
 - 3.1.7 Letter H-5, 79-739, of May 16, 1976 from Mr. Alan Hack, LASL, Respirator Research and Development Section to Mr. John Collins, USNRC RE: Respiratory Protection at TMI.
 - 3.1.8 10 CFR 20
 - 3.1.9 10 CFR 50
 - 3.1.10 NRC Information Notice 90-08
- 3.2 REFERENCES USED IN IMPLEMENTING THIS PROCEDURE.
 - 3.2.1 1903.033, "Protective Action Guidelines for Rescue/Repair and Damage Control Teams"
 - 3.2.2 1903.030, "Evacuation"
 - 3.2.3 1601.209, "Whole Body Counting Bioassay"
 - 3.2.4 1601.201, "Issue/Control of TLD's"
- 3.3 RELATED ANO PROCEDURES

- 3.3.1 1903.066, "Emergency Response Facility Operational Support Center (OSC)"
- 3.3.2 1903.067, "Emergency Response Facility Emergency Operations Facility (EOF)"
- 3.4 REGULATORY CORRESPONDENCE CONTAINING NRC COMMITMENTS WHICH ARE IMPLEMENTED IN THIS PROCEDURE: [BOLD] DENOTES COMMITMENTS
 - 3.4.1 OCANO78609, (P-4235), Section 6.2
 - 3.4.2 0CAN038313, (P-4192), Form 1905.001 A Section IIB1
 - 3.4.3 LIC94-226 (P-14029), 6.5.2 Note

4.0 DEFINITIONS

- 4.1 <u>Controlled Access Area</u> Any area where full radiological controls are in effect for the purpose of providing protection and/or information to the individual. (Includes the auxiliary buildings inside the turnstyles, both reactor buildings, and inside the fenced area of the BWST/RWT.)
- 4.2 <u>Control Point</u> An area established on the perimeter of, and in the normal access route to/from an RCA for the purpose of controlling personnel and or material movement.
- 4.3 Radiologically Controlled Area A Radiologically Controlled Area (RCA) is defined as an area within the plant site in which radioactive material and/or radiation may be present in quantities sufficient to require protective measures. (The Controlled Access Area, for example, is a Radiologically Controlled Area).
- 4.4 <u>Emergency Operations Facility</u> (EOF) A near site emergency response facility located approximately 0.65 miles northeast of the reactor buildings (the ANO Training Center).
- 4.5 <u>Technical Support Center</u> (TSC) Located within the ANO Administration Building equipped with instrumentation and communication systems and facilities useful in monitoring the course of an accident; this center is located in the 3rd Floor Conference Room.
- 4.6 <u>Emergency_Response_Organization</u> (ERO) The organization which is composed of the Initial Response Staff (IRS), the EOF staff, the TSC staff, the OSC staff and the emergency team members. It has the capability to provide manpower and other resources necessary for immediate and long-term response to an emergency situation.
- 4.7 <u>Operational Support Center</u> (OSC) The Emergency Response Center within the ANO maintenance facility, that serves as the assembly point and briefing area for rescue/repair and damage control teams. The OSC is where the following functions are coordinated:

4.7.1 On-site Radiological Monitoring

- 4.7.2 Maintenance
- 4.7.3 Nuclear Chemistry
- 4.7.4 Emergency Medical Support
- 4.7.5 Fire Fighting Support
- 4.8 HEALTH PHYSICS NETWORK (HPN) TELEPHONE

Dedicated telephone system established by the NRC during its standby or initial activation mode of operations after the licensee's TSC/EOF has been activated and is operational. The HPN is the primary means of communicating radiological data (on-site and off-site measurements and dose assessment information) from the licensee to the NRC.

5.0 RESPONSIBILITIES

- 5.1 MANAGER, RADIATION PROTECTION AND RADWASTE
 - 5.1.1 Responsible for the overall control and implementation of this procedure.
- 5.2 HEALTH PHYSICS SUPERVISOR
 - 5.2.1 Responsible for the implementation of this procedure within the ANO site boundary fence.
 - 5.2.2 Responsible for directing on-site monitoring and assigning personnel to the on-site and off-site radiological monitoring sections of the Emergency Radiation Team.
- 5.3 EOF HEALTH PHYSICS SUPERVISOR
 - 5.3.1 Responsible for ensuring that the appropriate control points and radiological control measures are established and implemented at the Emergency Operations Facility/ Alternate Emergency Operations Facility.

6.0 INSTRUCTIONS

4

- 6.1 GENERAL GUIDELINES FOR EMERGENCY RADIOLOGICAL CONTROL
 - 6.1.1 The Health Physics Supervisor should use Form 1905.001A as a checklist for ensuring appropriate radiological controls have been implemented.
 - 6.1.2 As manpower becomes available, the Health Physics Supervisor should assign at least one (preferably two) H.P. technicians to report to the EOF to assist the EOF Health Physics Supervisor.

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· · · · · · · · · · · · · · · · · · ·	6.1.3	Upon receipt of survey results, the Manage Protection and Radwaste should check Attac appropriate emergency response actions su or notification are implemented. Radiolo results should be posted in the Technical and the Operational Support Center.	chment 1 ch as eva gical sur	to ensur cuation vey
	6.1.4	Based on reported radiological survey dat by the Manager, Radiation Protection and Health Physics Supervisor shall establish Controlled Area boundaries in accordance Protection procedures.	Radwaste, Radiolog	tne fically
	6.1.5	IF an emergency condition lasts longer th THEN the Manager, Radiation Protection an establish an Emergency Radiation Team wor	d Radwast	e shall
	6.1.6	Beta radiation from Kr-85 gas is a signif accident involving spent fuel. Direct ex gas could result in a skin dose up to 100 Dose equivalent dose. The half-life of K years. For these reasons, <u>IF</u> the accident involves spent fuel, <u>THEN</u> the Health Physics Supervisor shall area surveyed for beta radiation.	posure to times th r-85 is 1	ne Deep 10.76
6.2	[CONTROL	POINT ESTABLISHMENT]		
	6.2.1	IF radiation levels exceed 2.5 mRem/hr or (greater than 1 DAC particulate or iodine activity exists outside confines of Auxil buildings, THEN control points should be established as defined by survey results.	e) airborn liary and	ie Turbine
	6.2.2	Once the extent of contamination, radioac concentrations and radiation exposure rat known, the control point for Emergency T be located as close to the Controlled Acc possible without sacrificing communication entry/exit control.	e conditi leam entri less Area	ions are ies shou as
		A. Radiological conditions permitting, controlled access area control point Two Auxiliary Building (Elev. 386') the control point for emergency resp into the Auxiliary Building.	ts in Uni should b	t One ar e used a
	6.2.3	IF radiation levels exceed 2.5 mRem/hr or $\sqrt{\alpha}$	signific) airborn	cant ne

1

3 IF radiation levels exceed 2.5 mRem/hr or significant (greater than 1 DAC particulate or iodine) airborne activity exists at the EOF, THEN a control point should be established at the entrance to the EOF and the need for a contamination control point evaluated.

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é	5.2.4	The cont	following radiological controls shoul rol points.	d be inst	ituted at
		A.	Personnel entry log including time i Dosimeter reading(s) should be maint entries on Form 1905.001B.	n, out ar ained for	nd all
		в.	A frisking station should be used to for contamination when exiting a rad controlled area.	check pe liological	ersonnel lly
		c.	Air samples <u>should</u> be taken every ho taken once every four hours.	our and <u>s</u>	hall be
		D.	A survey of the control point area s if the friskers indicate a rise in t level.	should be the area n	conducted radiation
			IF no friskers are set up at the con THEN hourly area surveys should be of sample and dose rate data should be appropriate forms and data reviewed the Health Physics Supervisor to det or trends. Significant changes show the Manager, Radiation Protection ar as practical.	conducted maintaine periodica cermine in ild be rep	. Air ed on ally by ncreases ported to
6.3	RESPIRATOR	Y PR	DTECTION		
	6.3.1	Resp	iratory Protection Guidelines		

- A. Although doses should be maintained as low as reasonably achievable during an emergency, respirators should not be assigned to emergency team members or emergency response facility personnel if the use of respirators will have an adverse affect on the timely implementation of emergency measures and projected dose is less than 40 DAC-hrs/week.
- B. During emergency conditions, higher uptakes may be authorized in a manner similar to that for increased external exposure as specified in 1903.033 "Protective Action Guidelines for Rescue/Repair and Damage Control Teams".
- C. Protection factors for respirators are identified in 1000.031, "Radiation Protection Manual" and 10 CFR 20 Appendix A. However, the Respiratory Protection Manual specifies that these protection factors are not applicable unless the respirator has been quantitatively fit tested on the wearer.
- D. The Health Physics Supervisor shall ensure the following data, on personnel entering the RCA(s), is recorded on Forms 1601.209D and F or tracked on the ERIM system.
 - 1. Occupancy time and airborne concentrations
 - 2. DAC-Hrs (each entry, each day, and last 7 days)
 - 3. Protection factor for the respiratory protection device worn

E. All individuals entering radiologically controlled areas shall have whole body counts or bioassays performed, as soon as practical, if their exposure to radioactive airborne concentration exceed 4 DAC-HRS per day or 12 DAC-HRS/wk or 40 DAC hours since last whole body count.

6.4 IODINE CANISTER USE

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- NUREG-0041 and Regulatory Guide 8.15 do not provide a 6.4.1 protection factor for iodine canisters for routine use because of difficulties ensuring continued protection. As a result, the only respirators which are suitable in iodine atmospheres are air supplied devices, such as SCBA and air line masks. (NUREG-0041 prohibits the use of air line masks in rescue operations). However, in addition to airborne radioactivity, the areas in which the respirators are likely to be used may also be affected by high dose rates. Since mobility is reduced when wearing SCBAs, it may be more conducive to overall dose reduction to use iodine canisters in lieu of SCBAs. For these reasons, the Manager, Radiation Protection and Radwaste or the Health Physics Supervisor may direct that iodine canisters be used in emergency conditions.
- 6.4.2 The filter canister authorized is the MSA GMR-I charcoal canister.
- 6.4.3 The protection factor is 1 for iodine.
- 6.4.4 The respirator shall not be used in iodine atmospheres greater than 100 times the 10 CFR 20 value for the specific iodine nuclide. For Iodine-131, this is 2 E-6 µCi/cc. (Assumes stay-time control).
- 6.4.5 The stay-time in affected areas shall not exceed 40 DAChours in any seven consecutive days. (This provides for additional subsequent dose).
- 6.4.6 Appropriate representative air sampling shall be performed.
- 6.4.7 Suitable DAC-hour records shall be kept in accordance with Section 6.3.1(D).
- 6.4.8 Personnel exposure to iodine atmospheres with iodine canisters shall be monitored as follows:
 - A. At least weekly whole body counting while exposures continue.
 - B. <u>IF</u> results of whole body counting indicate an iodine uptake in excess of 70 nCi, <u>THEN</u> that individual(s) shall be restricted from further entry to iodine atmospheres pending evaluation by the Manager Radiation Protection and Radwaste.

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6.5 I	PERSONNEL MONITORING		

6.5.1 Assignment of Dosimetry

- A. Personnel radiation exposure shall be monitored by regulation if 10% of the applicable limit could be received; or they will be entering a High Radiation Area or a Very High Radiation Area.
- B. <u>IF</u> a significant release of radioactivity occurs such that an individual would receive a dose in excess of 2.5 mRem in any one hour, <u>THEN</u> this area shall be designated as radiologically controlled area and Dosimetry shall be worn in affected areas.
- C. Emergency response personnel shall wear a TLD at all times while on site during the emergency.
- D. When an emergency involves a site evacuation, final personnel dosimetry issue and collection operations should be relocated to the EOF or an alternate low back-ground area designated by the Manager, Radiation Protection and Radwaste.
- 6.5.2 Assignment of Dosimetry to Emergency Teams

NOTE

Alarming dosimeters may be used in lieu of self-reading dosimeters (SRDs). Personnel should be cautioned to check SRDs frequently since conditions may change rapidly. SRDs should never be allowed to exceed 3/4 scale. Personnel with SRDs reading at or above 3/4 scale should exit immediately unless such action would endanger the plant or another person. Other dosimetry (SRDs or alarming dosimeters) may be assigned by the HP Supervisor or Radiation Protection and Radwaste Manager.

[NOTE

During a "Personnel Emergency" the Emergency Medical Team may go into Radiologically Controlled Areas without SRDs/Alarming Dosimeters as long as an HP Technician is acting as the RWP; and is monitoring dose rates and time in the area. Prompt medical attention shall take precedence over HP procedures when an individual is seriously injured.]

- A. Personnel requiring entry into a Radiologically Controlled Area shall wear the following dosimetry as a minimum:
 - 1. TLD
 - 2. SRD (0-200 mR or 0-500 mR) or alarming dosimeter

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<u>,</u>		в.	sust	the event major fuel damage is su bected, use of 0-200 R dosimeters widered in high dose rate areas.	stained of should b	or De
		c.	Radi foll	Health Physics Supervisor and th ation Protection and Radwaste sh owing data are maintained for em pers on Form 1905.001B.	all ensur	the the
			1.	Entry and exit times		
			2.	Dosimeter readings for each ent	try	
			3.	Cumulative personnel exposures		
			4.	If multiple dosimetry is requir Procedure 1601.201, "Issue and	red, refe Control	r to of TLD's
6	5.5.3	Assi	gnmen	t of Dosimetry to Offsite Emerge	ncy Organ	ization
		A.	with	site personnel called upon to pro nin the ANO protected area should ssigned whole body TLD.	ovide ass: 1 be issue	istance ed an
			1.	TLD issue log should include: - individual's last name - TLD number		
			2.	The TLD issue process shall not response of organizations such Emergency Medical Services (PCI Department that are responding plant equipment necessary for p public.	as Pope EMS) or L to prote	County ondon Fi ct life
		в.	not	the termination of the emergency, ify the dosimetry department of t ssigned TLDs.	, Securit the issue	y shall of
		c.	Sec to	urity shall forward the badge iss the Manager, Emergency Planning.	sue log (or a cor
			1.	The Manager, Emergency Planning log and provide the following dosimetry department.	g shall r informati	eview th on to th
				a. Individual's full name an number b. Individual's address	d social	securit
				c. Employer's name		
		D.	ind sho	directed by the Radiation Protect ividuals that have been issued us uld have a whole body count as so lowing the emergency.	nassigned	TLDs

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	б.5.4	Acce	lerated TLD Processing			
		Α.	More frequent readings of TLDs shoul during the emergency and, initially, operations until such time as exposu been identified and exposure control established by the Manager, Radiatio Radwaste.	during r re trends methods	ecovery have	
		Β.	In the event of an accidental exposu planned emergency exposure, the TLDs individuals involved shall be proces practicable following exposure. Fur should not be allowed until the resu badge readings are available and hav	of the sed as so ther expo lts of th	oon as osure neir TLD	
	6.5.5	Reco	ording of Personnel Exposures			
		Α.	Dosimeter (SRD or alarming dosimeter be recorded on Form 1905.001B, "Acce Control Log" or equivalent ERIM syst 1905.001B shall be kept by the Healt Supervisor for the purpose of interi tracking for individuals performing activities.	ess and Ex em progra h Physics m exposur	cposure ams. Fo: s re	
		В.	TLD readings shall be recorded in ac procedure 1601.201, "Issue/Control o	cordance of TLD's".	with	
6.6	DECONTAM	MINATION OF EVACUEES				
	6.6.1	stat cont	ing plant evacuation, the Health Physi tioned at the portal monitors should s caminated individuals until an evaluat camination can be performed.	egregate	any	
7.0 ATTACHME	NTS AND	FORMS				
7.1	ATTACHME	NTS				

- 7.1.1 Attachment 1 "Emergency Radiological Conditions Action Levels"
- 7.2 FORMS

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- 7.2.1 1905.001A, "Health Physics Supervisor Checklist".
- 7.2.2 1905.001B, "Access and Exposure Control Log"
- 7.2.3 1905.001C, DELETED PER PC-1.

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			ATTACHMENT 1	Dago	1 of 2	
			EMERGENCY RADIOLOGICAL CONDITIONS ACTION LEVE	-	1 01 2	
A.	Emer	gency				
			Initiating Condition	Emergeno <u>Classifica</u>		
	1.	than	or more ARMS in Rx. Bldg. increase by greater 2000 mR/hr due to severe degradation in the rol of radioactive material.	Alert		
	2.	incre	or more ARMS in Aux. Bldg. or Fuel Handling Area case by greater than 100 mR/hr due to severe dation in the control of radioactive materials.	Alert		
	з.	Great	er than 50 mRem/hr TEDE at site boundary.	Site Are	ea Emergenc	
	4.	Great bound	er than 150 mRem/hr Child Thyroid at site lary.	Site Are	ea Emergenc	
	5.	Great	er than 250 mRem/hr TEDE at site boundary.	General	Emergency	
	б.	Great bound	er than 500 mRem/hr Child Thyroid at site lary.	General	Emergency	
в.	Evac	cuation	<u>1</u>			
			Initiating Condition	Acti	on	
	1.	Great	er than 2.5 mRem/hr <u>outside</u> CAA	Notify S Supering TSC Dire	:endent/	
	2.		er than 9E-10 μCi/cc outside CAA evaluated)	Notify S Superint TSC Dire	cendent/	
	3.		er than 2.5 mRem/hr radiation levels at TSC, or remainder of the Administration Building.	*Notify Superin TSC Dire	cendent/	
	4.	remai	ter than 9E-10 μCi/cc in the TSC, OSC, or Inder of the Administration Building valuated).	*Notify Superint TSC Dire	cendent/	
	5.		he Airborne levels greater than 9 μCi/cc.	-	cupancy Log ected Area	
	6.		ne Airborne levels greater than 4 DAC E-8 μCi/cc).	Area or Respira Protect:	tory	

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ATTACHMENT 1

Initiating Condition

- Radiation levels greater than 100 mRem/hr but less than 1 Rem/hr at TSC, OSC, or remainder of the Administration Building.
- Radiation levels greater than 1 Rem/hr at TSC, OSC, or remainder of the Administration Building.

*On-site radiological monitoring section should:

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- 1. Increase surveillance of airborne radioactivity to once per hour.
- 2. Determine the dose rates in the area every 15 minutes.
- 3. Evaluate projected personnel accumulated doses and establish appropriate stay times.
- 4. Post radiological survey results in the TSC and in the OSC.

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Action

Evacuate if determined to be a long term condition. If determined to be a short-term condition evaluate the projected personnel accumulated dose.

Evacuate Immediately

Page 1 of 2

HEALTH PHYSICS SUPERVISOR CHECKLIST

			INIT					
I.	If not already accomplished, contact should be attempted with ERT members either by the plant paging system or by telephone.							
	for y Super	est the TSC Support Superintendent to call an assistant you (if desired). This assistant may be another HP visor or someone from the HP Technical Assistant list in mergency Telephone Directory.						
II.	Assig	m the On-site Radiological Monitoring Section						
	A.	Assign at least one (1) H.P. for monitoring the affected unit's Control Room.						
	в.	Assign HP coverage for the TSC, OSC, and EOF HP Supervisor.						
		 [Ensure that all radiological surveys are posted in their respective Facilities for staff review] 						
	c.	Establish communications:						
		 Assign OSC base radio operator. (Instruction booklet with radio.) 						
		 Assign HPN telephone communicator. (Instruction booklet with HPN telephone.) 						
	D.	Emergency equipment inspected and made operational.						
	E.	RCA boundaries established.						
	F.	Contamination control point established.						
	G.	Control point logs established.						
	н.	Personnel decontamination sites designated.						
	I.	Emergency dosimetry/respiratory equipment requirements established for ERT members and TSC/OSC staff.						
	J.	Determine immediate response needs:						
		1. On-site surveys, samples required, etc.						
		2. Initial re-entries by other emergency teams.						

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- 4. <u>Plant Evacuation</u>- one HP technician shall be stationed at the portal monitors at each guard station. Ensure HP personnel have obtained portable radiological monitoring equipment.
- 5. <u>Medical Emergencies</u>- provide assistance to medical personnel in accordance with procedure 1903.023.
- 6. <u>PASS Sample</u>- provide assistance to Nuclear Chemistry personnel in accordance with procedure 1905.003.
- 7. Survey affected area for beta radiation if the accident involves spent fuel.
- III. Assign the Off-site Radiological Monitoring Team (include appointment of section leaders as necessary).
 - A. Establish 2 to 4 Off-site Monitoring Teams, each team composed of at least 2 members; have the teams obtain vehicle keys and gas pump keys. The teams are to proceed to the EOF, obtain and inspect field monitoring kits, and report to the Off-site Monitoring Supervisor in Room 264 at the EOF.
 - B. Select one HP technician to report to the Off-site Monitoring Supervisor in Room 264 at the EOF as the Off-site Monitoring team Base Radio Operator. (Instruction booklet with Base Radio in Dose Assessment Room.)
 - C. Select one HP technician to report to the Dose Assessment Supervisor in Room 262 at the EOF as the HPN telephone communicator. (Instruction booklet with HPN telephone).
 - D. Instruct at least 2 HP technicians to report to the EOF HP Supervisor at the EOF.
 - E. After immediate needs are addressed, establish ERT schedule for an extended event.
 - F. Contact the Support Manager in the EOF if additional manpower is required.
 - G. Provide periodic updates to team personnel and the OSC Director.

Completed by:

Reviewed by: _

Health Physics Supervisor

Form 1905.001A for records retention.

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EMERGENCY RADIOLOGICAL CONTROLS CHECKLIST

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ACCESS AND EXPOSURE CONTROL LOG

DATE:		L(OCATION:	SHIF	<u> </u>		
Name	Badge #	ED/SRD Number	Availible Exposure	Time Departed	Destination/ Comments	Time Returned	Exposure Received
		-					
· · · · · · · · · · · · · · · · · · ·							

REVIEWED BY:_____

DATE:_____

FORM TITLE:

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ACCESS AND EXPOSURE CONTROL LOG

FORM NO.

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