

February 28, 2000

Mr. Thomas J. Palmisano
Site Vice President and General Manager
Palisades Nuclear Generating Plant
Consumers Energy Company
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: NRC ROUTINE EMERGENCY PREPAREDNESS INSPECTION REPORT
50-255/2000003(DRS)

Dear Mr. Palmisano:

On February 4, 2000, the NRC completed an inspection at your Palisades Nuclear Generating Plant. The enclosed report presents the results of that inspection. The inspection examined activities conducted under your emergency preparedness program. Based on the results of this inspection, no violations of NRC requirements were identified.

Areas examined within your emergency preparedness program are identified in the report. Within those areas, the inspection consisted of a selective examination of procedures and representative records, interviews with personnel, and observation of activities in progress. The objective of the inspection effort was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements.

During this inspection our evaluation of your activities concluded that the emergency preparedness program was effectively implemented. In particular, emergency response facilities, equipment, and supplies had been well-maintained; and emergency response personnel were knowledgeable of responsibilities and emergency procedures.

In accordance with 10 CFR 2.790 of the NRC's "Rules and Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room (PDR).

T. Palmisano

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We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/RA Wayne J. Slawinski *Acting For*

Steven K. Orth, Acting Chief
Plant Support Branch

Docket No. 50-255
License No. DPR-20

Enclosure: Inspection Report 50-255/2000003(DRS)

cc w/encl: R. Fenech, Senior Vice President, Nuclear
Fossil and Hydro Operations
D. Malone, Acting Director, Licensing
R. Whale, Michigan Public Service Commission
Michigan Department of Environmental Quality
Department of Attorney General (MI)
Emergency Management Division, MI Department
of State Police

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-255
License No: DPR-20

Report No: 50-255/2000003(DRS)

Licensee: Consumers Energy Company

Facility: Palisades Nuclear Generating Plant

Location: 27780 Blue Star Memorial Highway
Covert, MI 49043-9530

Dates: January 31 - February 4, 2000

Inspector: Robert D. Jickling, Emergency Preparedness Analyst

Approved by: Steven K. Orth, Acting Chief, Plant Support Branch
Division of Reactor Safety

EXECUTIVE SUMMARY

Palisades Nuclear Generating Plant NRC Inspection Report 50-255/2000003(DRS)

This inspection reviewed the Emergency Preparedness (EP) program, an aspect of Plant Support. The inspector selectively evaluated the quality of EP program-related audits and reviews, reviewed the effectiveness of management controls, verified the adequacy of emergency response facilities and equipment, reviewed a number of EP training and qualification activities, and performed follow-up reviews on previous inspection findings. This was an announced inspection conducted by one regional inspector.

- Licensee personnel performed proper classifications and timely notifications during two actual activations of the emergency plan. The licensee correctly declared the Unusual Events, although the 1999 Unusual Event declaration was delayed approximately 40 minutes (Section P1).
- The inspected emergency response facilities, equipment, supplies, and prompt alert and notification system sirens were effectively maintained (Section P2.1).
- Semiannual augmentation tests were conducted and were generally effective, but evidenced some potential equipment and process vulnerabilities including the age of the telecomputers and difficulty obtaining replacement parts; lack of guidance for and difficulty in collecting test data; and inconsistencies in interpreting test data (Section P2.1).
- Issues assigned to the Emergency Planning Section were effectively tracked using the condition report system (Section P3).
- The EP training program was effective. Selected key emergency response organization personnel demonstrated effective knowledge of emergency responsibilities and procedures (Section P5).
- All personnel reviewed on the Emergency Employee Augmentation Listing were qualified for their emergency response positions (Section P5).
- The licensee's 1999 Emergency Preparedness program audit was effective and satisfied the requirements of 10 CFR 50.54(t) (Section P7).

Report Details

IV. Plant Support

P1 Conduct of Emergency Preparedness Activities

P1.1 Actual Emergency Plan Activations

a. Inspection Scope (82701)

The inspector reviewed records and documentation packages regarding plant response for emergency plan activations that occurred since the last routine emergency preparedness program inspection.

b. Observations and Findings

An Unusual Event was declared at 4:09 p.m. (ET) on September 25, 1998, due to an earthquake felt onsite. Control room operators were notified at approximately 3:57 p.m. that personnel in the switchyard and support building felt an earthquake. The Unusual Event was appropriately declared using Emergency Implementing Procedure, EI-1, "Emergency Classification and Actions," after the shift supervisor called the National Earthquake Information Center and verified that a five Richter Scale earthquake had struck the Midwest at 3:53 p.m.

Offsite notifications to Van Buren County and the State of Michigan were completed at 4:15 p.m., which met the 15 minute requirement. The Emergency Notification System (ENS) call to the NRC was initiated at 4:37 p.m., which met the one hour requirement. The Unusual Event was terminated at 5:26 p.m. on September 25, 1998, after Operations and Design Engineering personnel inspected safety equipment and found no damage. The NRC was notified of the termination via ENS at 5:31 p.m. In accordance with Administration Procedure 1.08, "Emergency Preparedness Program," the licensee's emergency planning staff conducted a detailed and thorough assessment of plant personnel's emergency response. Documents reviewed indicated that the event classification and related notifications of offsite authorities and the NRC were made properly and in a timely manner.

An Unusual Event was declared at 4:25 p.m. (ET) on September 7, 1999, due to a significant loss of offsite communications capability. At approximately 2:40 p.m., Plant Facilities staff began receiving calls from plant personnel experiencing problems placing offsite calls. During a phone line test, conducted by the emergency planning coordinator, at approximately 3:45 p.m., the control room staff discovered that all offsite land line communications had been lost. The shift engineer's satellite phone was tested as an alternate means of offsite communication by calling the NRC, Van Buren County, and the State of Michigan from approximately 3:52 p.m. through 4:09 p.m. At approximately 4:16 p.m. it became apparent to the licensee's management that the Emergency Response Data System (ERDS) and the ability to augment emergency responders, if needed, were unavailable due to the loss of offsite land line

communications. The Unusual Event was appropriately declared using Emergency Implementing Procedure, EI-1, "Emergency Classification and Actions." Offsite notifications to Van Buren County and the State of Michigan using the shift engineer's satellite phone were made at 4:25 p.m. and 4:29 p.m., which met the 15 minute requirement. The satellite phone was also used to notify the NRC at 4:39 p.m., which met the one hour requirement. The Unusual Event was terminated at 8:31 p.m. on September 7, 1999, after the fiber optic line had been repaired and all offsite phone lines had been restored. Termination notifications were completed by 8:33 p.m.

In accordance with Administration Procedure 1.08, "Emergency Preparedness Program," the licensee's emergency planning staff conducted a detailed and thorough assessment of plant personnel's emergency response. The assessment identified two issues concerning the length of time for the control room to become aware of the loss of offsite communications and the timeliness of the emergency declaration after the control room became aware of the loss of offsite communications. The results of the assessment characterized the delayed emergency declaration as a missed opportunity for timely emergency classification. The root cause indicated that Plant Facilities, responsible for phones, did not call the control room to report the loss of offsite communications capability.

Corrective actions identified included revision to the Emergency Implementing Procedure, EI-1, "Emergency Classification and Actions," to clearly define a significant loss of offsite communications capability; to develop guidance for Plant Facilities staff concerning degraded or loss of phone communications; and to include in training the importance of declaring an emergency when recognized and not to delay for resource availability and paperwork completion. Identified issues were captured on condition reports, and corrective actions were completed.

c. Conclusions

The inspector concluded that the licensee correctly declared the Unusual Events, although the 1999 Unusual Event declaration was delayed approximately 40 minutes from the time the control room was aware of the loss of offsite communications. The emergency classifications were made correctly, and offsite notifications were made in a timely manner. The evaluation packages were detailed and provided a thorough assessment of the plant's response to the actual events.

P2 Status of Emergency Preparedness Facilities, Equipment, and Resources

P2.1 Material Condition of Emergency Response Facilities (ERFs)

a. Inspection Scope (82701)

The inspector evaluated the material condition of the control room, Technical Support Center (TSC), Operational Support Center (OSC), and the Emergency Operations Facility (EOF). Field team monitoring kits and other equipment were also inspected. The licensee demonstrated the operability of several pieces of emergency response

equipment, including radiological survey instruments, dose assessment and plant data computer terminals, and communications equipment.

b. Observations and Findings

The control room was well-maintained, and current emergency procedures were available. A second phone line had been added for notification of county and State agencies. The offsite notification phone lines and the emergency notification system phone were verified as operable.

The OSC, TSC, and EOF facilities, equipment, and supplies were effectively maintained. Status boards in the EOF, TSC, and OSC were in good material condition and ready for facility setup and use. All commercial, dedicated, and licensee phone lines checked were found operable. The licensee dose assessment system was verified to be operable, as were the plant process computer terminals. Six emergency lights had been installed in the OSC/lunchroom. Additionally, two emergency lights had been installed in the men's locker room which was part of the OSC. All survey instruments checked in the TSC, OSC, and EOF were functional and currently calibrated.

Public Warning System (PWS) siren records for 1998 and 1999 were reviewed by the inspector. The overall annual operability average of the licensee's 84 total sirens for 1998 was 95.7 percent, with 88.9 percent for the lowest month's average. The 1999 annual operability average was 95.79 percent, with 92.8 percent for the lowest month's average. Siren operability exceeded both the annual acceptability limit of greater than or equal to 90 percent and the monthly acceptability limit of 70 percent.

The inspector reviewed records for the semiannual augmentation tests. The tests provided off-hours calls to off-shift Emergency Response Organization (ERO) personnel to determine whether they could respond to their ERFs in time to augment the on-shift crew within specified times of an emergency declaration. Appropriate records were available for documentation of the tests. Augmentation drills had been conducted on December 15, 1998; June 22, 1999; and December 14, 1999. Emergency Plan Implementing Procedure (EPIP) EI-2.2, "Emergency Staff Augmentation," Revision 6, provided for semiannual augmentation tests. The procedure provided that test results with less than a 90 per cent success rate in filling the total number of required positions will be evaluated for corrective action. All of the test results reviewed exceeded the 90 percent success rate and were performed at the required frequency.

The inspector noted a number of potential augmentation callout process and equipment vulnerabilities. Examples included that the callout process required four independent steps: manual phone calls to selected health physics personnel; activation of autodialer phone calls; activation of the three augmentation telecomputers; and activation of the emergency pager system. Equipment vulnerabilities included the age of the telecomputers and the difficulty obtaining replacement parts or maintenance. Additional examples included the lack of formal guidance for conducting the semi annual augmentation tests. The inspector noted that of the three tests results that were reviewed, the June and December 1999 results had inconsistently calculated arrival times for a number of the augmentation personnel, which could not be explained by the person that conducted the test and reported the results. Currently, there was one

person in the Emergency Planning Section that was familiar with the augmentation equipment and test process. After June 2000, the individual familiar with the complex process and 1970's technology equipment, was leaving the Emergency Planning Section to take a position in Operations Training. The licensee initiated two condition reports to address these issues.

c. Conclusions

The emergency response facilities, equipment, supplies, and the Public Warning System sirens were effectively maintained. Semiannual augmentation tests were conducted and were generally effective, but evidenced potential equipment and process vulnerabilities. Including the age of the telecomputers and difficulty obtaining replacement parts; lack of guidance for an difficulty collecting test data; and inconsistencies in interpreting test data.

P3 Emergency Preparedness Procedures and Documentation

a. Inspection Scope (82701)

The inspector reviewed a selection of emergency plan implementing procedures (EIPs) and emergency plan sections. Also, the corrective action and issue tracking system reports related to the Emergency Planning Section were examined.

b. Observations and Findings

The inspector reviewed EIP EI-1, "Emergency Classification and Actions," Revision 32, dated January 11, 2000. The procedure contained the Shift Supervisor and Site Emergency Director (SED) responsibilities, the emergency action levels (EALs) for emergency classification, and an attachment checklist for required actions and notifications. This revision included a clarification to the communication loss EAL, which effectively defined the phrase, "significant loss of offsite communications capability," as loss of the emergency notification system and all other phones including satellite phones, that could be used to make notifications to offsite authorities. The availability of one phone is sufficient to inform offsite authorities of plant problems.

The inspector reviewed EIP EI-2.1, "Site Emergency Director," Revision 22, dated January 6, 2000. The procedure provided the emergency responsibilities for the SED. This revision contained new responsibilities for considering implementation of Severe Accident Guidelines. The attachment for authorization to exceed administrative and 10 CFR 20 dose limits was detailed and clear.

The inspector reviewed EIP EI-4.1, "Technical Support Center," Revision 12, dated January 5, 2000. The procedure provided guidance for the activation, operation, and deactivation of the TSC. This procedure had been revised to better describe personnel responsibilities in the facility. The procedure used individual checklists to itemize responsibilities required and incorporated sign off blanks to certify that all actions were completed.

The inspector reviewed the Site Emergency Plan (SEP), Section 6.0, "Emergency Measures," Revision 8. Section 6.1 adequately identified the emergency organization activation. Section 6.4 identified the protective actions to be taken to minimize or to eliminate the hazard to the health and safety of the public and plant personnel. Responsibilities were clearly identified in the section, and Table 6.1 identified the Environmental Protection Agency's (EPA) Protective Action Guides (PAGs), but did not indicate the EPA's protective actions for the PAGs. Table 6.2 clearly identified the licensee's PAG and protective actions for projected dose and projected first year dose. Additionally, the SEP had been consolidated into a single document instead of nine sections and five appendices, which each required an annual review.

The inspector reviewed the corrective action and tracking system used by the Emergency Planning Section to determine the range of issues identified and the effectiveness of corrective actions and trending. The corrective action program currently used the plant's Condition Report (CR) process for initiating, identifying, tracking, and correcting issues. Approximately 42 CRs related to Emergency Planning were documented since August 15, 1998. Of the total 42 items, 36 CRs had been closed. The items reviewed were clearly identified by number, date, category, and description with responsible organizations identified, assignment dates, and due dates listed. These reports effectively documented and tracked the status of corrective actions related to a wide range of items identified.

c. Conclusions

Reviewed sections of the emergency plan and implementing procedures were consistent with regulatory guidance. Issues assigned to the Emergency Planning Section were effectively tracked using the Condition Report system. Items tracked had a wide range of categories and had been appropriately addressed by the EP staff.

P5 Staff Training and Qualification in Emergency Preparedness

a. Inspection Scope (82701)

The inspector reviewed various aspects of the licensee's EP training program. This included interviews with selected key emergency response organization (ERO) personnel, including a TSC SED, EOF Emergency Director, and control room Shift Supervisor/Site Emergency Director. Current attendance records, examinations, Palisades Emergency Employee Augmentation Listing, and the Site Emergency Plan Training Report were reviewed to determine whether ERO personnel were currently qualified.

b. Observations and Findings

Interviews with three key emergency response personnel indicated effective knowledge of procedures and emergency responsibilities. The control room and TSC SEDs demonstrated appropriate knowledge of their responsibilities and emergency procedures. During the interviews, personnel were generally consistent in their

comments that the EP program and training were effective and that the Emergency Planning staff were available and responsive.

Training records were compared with the Emergency Employee Augmentation Listing to verify that ERO personnel listed on the call list were qualified. All ERO personnel reviewed were currently qualified for their emergency response positions, as indicated by their training records.

c. Conclusions

The EP training program was effective. Selected key ERO personnel demonstrated effective knowledge of emergency responsibilities and procedures. All personnel reviewed on the Emergency Employee Augmentation Listing were qualified for their emergency response positions.

P6 Emergency Preparedness Organization and Administration

The EP program reporting structure changed since the last inspection, with the Training Manager reporting to the Site Vice President instead of the Plant Manager to the Site Vice President. Emergency Planning Section Supervisor, new since January 1999, continued to report to the Training Manager. The Emergency Planning Section consisted of the Emergency Planning Supervisor, four Emergency Planners, and an administrative technical support person. One of the four EP Planners also served as the EP trainer.

P7 Quality Assurance in Emergency Preparedness Activities

a. Inspection Scope (82701)

The inspector reviewed the Emergency Planning audit report for 1999, PA-99-06, "Palisades Emergency Preparedness Audit," dated July 20, 1999.

b. Observations and Findings

The inspector reviewed Nuclear Performance Assessment Department (NPAD) PA-99-06, "Palisades Emergency Preparedness Audit," conducted by three individuals from June 21 through July 2, 1999. The audit evaluated the effectiveness of the Palisades EP program, determined if the program continued to meet requirements, and evaluated the consistency with current industry standards. Areas reviewed included the Emergency Planning Organization, SEP compliance and implementation, adequacy of EP administrative and working level procedures, communication interfaces, ERO drill activities and facilities, NRC performance indicators, and corrective action efforts.

The audit identified no significant weaknesses; however, it resulted in four condition reports and three recommendations. The condition reports involved a repeat issue concerning a lack of communications to the EP Section regarding employee status or location changes, lack of clear criteria for the semiannual ERO augmentation call out tests start time, lack of documentation for OSC maintenance kit inventories (the

documentation was later found and became a nonissue), and specific drill and exercise records had not been transmitted to the Engineering Records Center for retention. The CRs corrective actions were completed in less than six months and closed out in a timely manner. The recommendations related to consideration of a procedure enhancement for estimating the Pasquill Stability Class under certain conditions, consideration of a procedure revision for protective action recommendations for offsite populations, and a recommendation to document why the area population increases and have not warranted evacuation time estimate changes.

c. Conclusions

The licensee's 1999 EP program audit was effective and satisfied the requirements of 10 CFR 50.54(t). The audit was of good scope and depth. Corrective actions resulting from the audit were appropriately tracked and completed within reasonable times. Evaluation of adequacy of interfaces with State and local governments for the audits were adequate.

P8 Miscellaneous Emergency Preparedness Issues

- P8.1 (Closed) Inspection Followup Item No. 50-255/98016-01(DRS): An inconsistency between the licensee's Plant Staffing and Augmentation Guidelines and NUREG 0654, Table B-1, was identified by the inspector. Region III NRC requested the Office of Nuclear Reactor Regulation (NRR) perform a technical review of the issue. The review by NRR indicated a need to evaluate this issue on a generic basis rather than resolving it on a case by case basis. The licensee opened and closed a CR on this issue and determined no additional action was necessary due to correspondence with the NRC approving their onshift staffing. This item is closed.
- P8.2 (Closed) Inspection Followup Item No. 50-255/98021-01(DRS): During the 1998 EP evaluated exercise, the emergency staffing augmentation autodialer system failed to function properly in the CRS. Additionally, the next day, the NRC found that neither the TSC nor the control room autodialer phone lines were functional. It was found that the extension line in the EOF was inadvertently left off-hook, which prevented the line from being used for incoming or outgoing emergency staff augmentation calls. Condition Report 98-1892 was initiated and long term correction action involved installation of a second independent line to prevent recurrence. This item is closed.
- P8.3 (Closed) Inspection Followup Item No. 50-255/98021-02(DRS): During the 1998 EP evaluated exercise, the control room oncall communicator displayed no sense of urgency to initiate the 15 minute notification to the offsite authorities for the Alert declaration and delayed the notification call to the counties and State by an additional three minutes. The exercise issue to not delay notification of offsite authorities was emphasized in training. The licensee also identified an equipment problem which led to the three minute delay in offsite notifications. Discussions with the licensee identified that subsequent drills indicated no further problems related to delayed notification of offsite authorities. This item is closed.

P8.4 (Closed) Inspection Followup Item No. 50-255/98021-03(DRS): During the 1998 EP evaluated exercise, the NRC identified that the OSC was not equipped with emergency lighting. An inspection followup item was opened for the licensee to evaluate the need for emergency lighting in the OSC. An Engineering Assistance Request was initiated by the licensee, six emergency lights were installed in the OSC/lunchroom, and two lights were installed in the men's locker room. This item is closed.

V. Management Meeting

X1 Exit Meeting Summary

The inspector presented the inspection results to licensee management at the conclusion of the onsite inspection on February 4, 2000. The licensee acknowledged the findings presented.

The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

E. Bogue, Chemistry and Radiological Services Manager
N. Brott, Emergency Planner
J. Brunet, Emergency Planning Coordinator
D. Cooper, Plant Manager
S. Cote, Property Protection Supervisor
P. Donnelly, Human Performance
K. Haas, Engineering Director
N. Haskell, Performance Improvement Director
H. Heavin, Controller
S. King, Licensing
T. Loudenslager, Emergency Planner
D. Malone, Licensing Director, Interim
J. Milan, Emergency Planner
M. Moore, NPAD
T. Palmisano, Site Vice President
D. Rogers, Training Director
G. Smith, Emergency Planning Supervisor
G. Szczotka, NPAD Manager
B. Taylor, Emergency Planner
S. Wawro, Maintenance and Planning Director

NRC

M. Jordan, Chief, Branch 3, Division of Reactor Projects
R. Krsek, Resident Inspector
J. Lennartz, Senior Resident Inspector

INSPECTION PROCEDURES USED

IP 82701: Operational Status of the Emergency Preparedness Program

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

50-255/98016-01(DRS)	IFI	Evaluation of Emergency Plan plant staffing and augmentation guidelines.
50-255/98021-01(DRS)	IFI	Function of the autodialer system in the control room and Technical Support Center.
50-255/98021-02(DRS)	IFI	Evaluation of the initial notification process in the control room simulator.
50-255/98021-03(DRS)	IFI	Evaluate the need for emergency lighting in the Operations Support Center.

Discussed

None

LIST OF ACRONYMS USED

CFR	Code of Federal Regulations
CR	Condition Report
DPR	Demonstration Power Reactor
DRS	Division of Reactor Safety
EAL	Emergency Action Level
ENS	Emergency Notification System
EOF	Emergency Operations Facility
EP	Emergency Preparedness
EPA	Environmental Protection Agency
EPIP	Emergency Plan Implementing Procedure
ERDS	Emergency Response Data System
ERF	Emergency Response Facility
ERO	Emergency Response Organization
IFI	Inspection Followup Item
NPAD	Nuclear Performance Assessment Department
NRC	Nuclear Regulatory Commission
NRR	Office of Nuclear Reactor Regulation
OSC	Operational Support Center
PAG	Protective Action Guides
PAR	Protective Action Recommendation
PDR	NRC Public Document Room
PWS	Public Warning System
SED	Site Emergency Director
SEP	Site Emergency Plan
TSC	Technical Support Center

PARTIAL LIST OF DOCUMENTS REVIEWED

Palisades Nuclear Generating Plant Emergency Plan

Site Emergency Plan, Section 6.0, "Emergency Measures," Revision 8

Nuclear Performance Assessment Department (NPAD) Audit PA-99-06, "Palisades Emergency Preparedness Audit"

Palisades Nuclear Plant Administrative Procedure No. 11.06, "Site Emergency Plan Training," Revision 3, dated February 17, 1999

Emergency Plan Implementing Procedure (EPIP) EI-1, "Emergency Classification and Actions," Revision 32, dated January 11, 2000

Emergency Plan Implementing Procedure (EPIP) EI-2.1, "Site Emergency Director," Revision 22, dated January 6, 2000

Emergency Plan Implementing Procedure (EPIP) EI-2.2, "Emergency Staff Augmentation," Revision 6, dated October 12, 1999

Emergency Employee Augmentation Listing, "Manual Call Sheet/TSC Communicator Verification Sheet," dated January 10, 2000