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The Northeast Utilities System

MAR 1 - 2000

Docket Nos. 50-245  
50-336  
50-423  
B18011

Re: 10 CFR 50, Appendix E  
10 CFR 50.47(b)(5)

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3  
Emergency Plan Department Instruction (EPDI)-07, Revision 5, Change 2

The purpose of this letter is to inform the Nuclear Regulatory Commission (NRC) Staff that EPDI-07, Revision 5, Change 2 "Drill and Exercise Manual" was implemented on February 9, 2000. Attachment 1 is a complete copy of the procedure for your records.

There are no commitments contained within this letter.

If you have any additional questions concerning this submittal, please contact Mr. David A. Smith at (860) 437-5840.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Stephen E. Scace  
Director - Nuclear Oversight and  
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cc: See next page

A045

Attachments (1)

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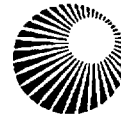
**Attachment 1**

**Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3**

**EPDI-07, Revision 5, Change 2**  
**Drill and Exercise Manual**

**March 2000**

EMERGENCY PLANNING SERVICES DEPARTMENT  
INSTRUCTION



Northeast  
Utilities System

Drill and Exercise Manual  
EPDI-07  
Rev. 5 Change 2

Approval:

Don Alsi for SEH  
Manager, Emergency Planning Services

Effective Date:

2/9/00

Level of Use  
Information

Emergency Planning Services Department Instruction

Drill and Exercise Manual  
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## 1.0 Introduction

This manual provides instruction for implementing the Northeast Nuclear Energy Company (NNECO) Drill and Exercise Program. Actions governed by this manual include drill and exercise planning, scenario development, player and controller preparations, implementation, evaluation, critiques, reports, and comment disposition and tracking. Not all steps of this instruction will be applicable for every drill. However, all steps must be reviewed for each drill to preclude omission of required actions.

The drill and exercise program described in this manual is required by the regulatory process governing the licensing of nuclear power plants. The Federal Emergency Management Agency (FEMA) and the Nuclear Regulatory Commission (NRC) cooperate to ensure that adequate emergency response capabilities exist, both on-site and off-site, for every nuclear power plant. Federal regulations and guidance material specify requirements and the roles of FEMA and the NRC in administering them. These requirements are the driving force behind the drill and exercise program.

A licensee's requirements for conducting drills and exercises are stated in 10 CFR 50.47(b) and 10 CFR 50, Appendix E. Additionally regulatory guidance is contained in NUREG 0654/FEMA-REP-1, Rev. 1. The NRC evaluates the effectiveness of a licensee's program in accordance with Inspection Procedures 82301, "Evaluation of Exercises for Power Reactors, and 82302, " Review of Exercise Objectives and Scenarios for Power Reactors".

Under 44 CFR 350 and NUREG 0654, Section N, it is the responsibility of State and Local governments to conduct joint drills and exercises to test their radiological emergency preparedness plans as a condition of initial and continued FEMA approval of those plans. Guidance for the development of exercises is addressed in: FEMA-REP-15, "Radiological Emergency Preparedness Exercise Evaluation Methodology", and FEMA-REP-14, "Radiological Emergency Preparedness Exercise Manual".

Federal requirements state that each licensee shall annually exercise its emergency plan and at least biennially exercise partially or fully with State and local government(s) participation. While this manual primarily concerns itself with the requirements related to drills and exercises conducted by NNECO, it also describes actions needed for the effective preparation and implementation of joint drills and exercises. As requested, NNECO will assist the States with maintenance of their 6-year exercise objective demonstration plan.

## 2.0 Responsibilities

### 2.1 Manager, Nuclear Emergency Planning Services

1. Provides overall direction for the Emergency Preparedness Drill and Exercise Program.
2. Coordinates development of drill and exercise schedules.
3. Coordinates major drill or exercise schedule changes and requests exemption with the appropriate federal agencies.
4. Appoints a Drill or Exercise Project Manager or assumes this role dependent upon the event.
5. Reviews and approves on-site drill and exercise objectives and extent of play.
6. Develops strategies to ensure that both on-site and off-site emergency response organizations participate in scheduled drills and exercises.
7. Reviews and approves on-site drill and exercise scenario packages.
8. Directs the preparation and dissemination of on-site drill and exercise reports.
9. Manages on-site drill and exercise comment resolution.
10. Acts as Company Liaison in dealing with off-site drill and exercise comment resolution.
11. Coordinates actions required to deal with the effects of an unplanned outage or other event which requires the cancellation or reschedule of a major drill or exercise.
12. Reports scenario compromises to the NRC and/or FEMA as appropriate. Coordinates follow-up and corrective actions with Federal agencies in the event that an exercise scenario has been compromised.
13. Establishes an exercise awards program, if appropriate.

### 2.2 EPS Department Staff

1. Prepares drill and exercise scenarios.
2. Interfaces with State and Federal agencies to resolve scenario comments.

3. Schedules and notifies on-site players and controllers for drill and exercise participation.
4. Ensures exercise scenario security.
5. Prepares the on-site controller organization for drill/exercise evaluation roles.
6. Assists the State(s) in the recruitment of an off-site controller organization.
7. Coordinates the submittal of the approved scenario to FEMA and NRC, as required.
8. Directs the development of controller materials; coordinates reproduction; ensures proper dissemination; and conducts controller training.
9. Maintains on-site player/controller drill documentation.
10. Implements drills and exercises.
11. Evaluates drill and exercise performances, and prepares objective evaluation reports for management review.
12. Coordinates disposition of drill and exercise comments.
13. Coordinates player feedback, as directed.

### 2.3 Drill Or Exercise Manager

(This position is appointed by the Manager, Nuclear Emergency Planning Services)

1. Directs preparation for, and implementation of, the drill or exercise.
2. Establishes the drill/exercise project team.
3. Interfaces with Federal, State and local agencies to coordinate the development of off-site drill and exercise objectives and extent of play.
4. Responsible for scheduling and planning project activities; monitoring progress; recording and reporting status; implementing corrective actions as necessary to ensure schedule integrity, until the project's objectives have been met.



### 3.0 Scheduling

In general, selection of an drill and exercise date controls the establishment of all other related dates. There is a six-year period during which selected drill and exercise objectives must be demonstrated. The NNECO 6 year objective demonstration plan contains the drill and exercise objectives and is maintained by the Emergency Planning Services Department. It is updated after each graded exercise to ensure all objectives are performed during the six year cycle. The objectives were derived from the information contained in NRC Inspection Procedure 82302. Off-site objectives are presented in FEMA REP-14

- 3.1 Preparations for the scheduling process should include the following actions and considerations:
- a. Identification of open issues from previous drills and exercises.
  - b. Determination of annual and other periodic requirements for each participating organization.
  - c. Simulator availability
  - d. Review of Federal schedule requirements presented on Figure 3-1-1.
  - e. Whenever possible, individual facility or response area drills should be grouped together and conducted as a Combined Functional Drill. This minimizes the number of drills, required volume of scenario material and demands on Station resources. Additionally, by reducing the number of simulated organizations and responses, a more realistic and beneficial learning experience is provided to players.
  - f. Millstone/Connecticut Yankee scheduled activities - check with Planning & Scheduling.
  - g. Millstone/Connecticut Yankee unscheduled activities - check with key managers.
  - h. NU initiatives - check with Millstone/Connecticut Yankee senior management.
  - i. Town Meetings
  - j. Sporting events e.g., Superbowl, World Series, etc.
  - k. Local/State/National Elections

- l. Major Seasonal events e.g.: hunting or fishing season opening day, regional festivals, etc.
- m. Religious holidays
- n. School vacations
- o. State/Federal holidays
- p. Facility use e.g., schools
- q. National/State/Local event days
- r. Organization functions e.g., state police

3.2 The Manager, Nuclear Emergency Planning Services will appoint a NNECO Drill or Exercise Manager, to coordinate establishment of a drill schedule for on-site and off-site organizations. Groups outside NNECO involved in this process should include, but are not limited to:

- a. Connecticut Office of Emergency Management (CT OEM)
- b. Rhode Island Emergency Management Agency (RIEMA)
- c. Connecticut Department of Environmental Protection (CT DEP)
- d. Federal Emergency Management Agency (FEMA)
- e. Nuclear Regulatory Commission (NRC)

3.3 Tentative drill and exercise schedules will be distributed among all involved groups for approval. The approval process will continue until the schedule has been approved by all participating organizations. Key to this approval process is determining the availability of required facilities.

3.4 Demonstration of exercise or drill objectives scheduled for evaluation in accordance with the NNECO 6 year objective demonstration plan may be satisfied by the effective response and documentation of on-site and/or off-site staff to an actual emergency. Credit shall be given for a particular objective when the following provisions of that objective are met in response to an actual emergency:

- a. The emergency required a prompt and timely response and mobilization of key SERO staff responsible for the implementation of RERP emergency functions.

b. The emergency resulted in the establishment of communications among responding organizations.

c. The following documentation, describing the level of response and involvement of key SERO responders to the emergency, is available:

Type of emergency;

Arrival times of responders & period of response;

Communications logs;

Emergency decisions made and implemented;

Emergency plan resources used; and

A complete list of staff involved.

d. The event is evaluated in accordance with Section 5.0 of this manual, determining if the actions taken were appropriate or the response warrants implementation of future corrective actions.

The tentative drill and exercise schedule should always recognize required drill or exercise activities until an actual emergency event has been evaluated to determine that the recorded response meets required drill or exercise objective criteria.

- 3.5 Once the drill and exercise schedule is approved, the appointed Drill/Exercise Manager will direct the preparation of a draft on-site drill/exercise objectives and extent-of-play, and monitor development of off-site drill/exercise objectives and extent-of-play by State agencies.
- 3.6 As necessary, meetings may be conducted to identify work tasks and completion dates, further clarify extent of play, define work task responsibilities between the various organizations, or resolve any conflict in drill and exercise implementation policies between the organizations.
- 3.7 A project schedule will be completed by the Drill or Exercise Manager, and reviewed and approved by the EPSD Change Review Committee (CRC). Major changes to the approved project schedule shall be reviewed by the CRC prior to implementation of the change.
- 3.8 Drill and exercise player and controller information will be provided to appropriate State representatives. State personnel will be responsible for the notification of State and local participants. If off-site participation appears to be a

problem, the Drill or Exercise Manager should seek further guidance from the Manager, Emergency Planning Services.

- 3.9 Station Managers and Supervisors should be reminded to consider the effects of drill and exercise assignments on posted work hours, lunch periods and work breaks, particularly for bargaining unit personnel.

**FIGURE 3-1-1**  
**Federally Required Milestones For Exercise Observation And Evaluation**

<u>Time (No Later Than X Days Before/After Exercise)</u>	<u>Milestone</u>
90	State and licensee jointly develop and submit exercise objectives to FEMA and NRC Regional Offices.
75	FEMA and NRC Regional Offices complete reviews of objectives and establish extent of play agreements. A meeting with licensee, State and FEMA may be necessary.
60	State and licensee submit exercise scenario package to FEMA and NRC Regions for review. Exercise ground rules are established.
45	FEMA and NRC Regions contact or meet with State and licensee to discuss scenario review results. Agreed-upon changes or modifications shall be documented and distributed. Evaluators are assigned and confirmed.
30	Exercise logistics are arranged. FEMA and NRC Regions develop specific post-exercise activity schedule for debriefings and meetings with the State.
15	Final scenario adjustments are completed.
14	The exercise evaluator packet are prepared and distributed. The packet should at a minimum provide: <ul style="list-style-type: none"> <li>a. Portions of the State and local plans applicable to each assignment.</li> <li>b. List of all exercise evaluators and their assignments.</li> <li>c. A time line of events.</li> <li>d. Scenario summary.</li> <li>e. Scenario technical data applicable for each assignment.</li> <li>f. Past exercise findings, including reports and all outstanding/unmet objectives.</li> <li>g. Applicable controller messages and reference materials.</li> <li>h. Logistical information.</li> <li>i. Log forms/module(s) for taking notes.</li> </ul>
1	All Federal observers, both NRC and FEMA, meet in the exercise area to finalize assignments and receive site specific evaluator training.
Exercise Day (ED)	The exercise is conducted. Evaluators hold exit interviews with participants at assigned locations. NRC holds exit interviews on-site.
ED + 1	Evaluator debriefing meeting is conducted by the Regional Assistance Committee (RAC) Chairperson. Evaluators complete log forms/module(s) for review and approval by team leaders and FEMA.

## FIGURE 3-1-1

### Federally Required Milestones For Exercise Observation And Evaluation

ED + 2	RAC Chair initiates consultation process for deficiencies. Exercise Evaluation Methodologies (EEM) Evaluation Forms and Narrative Summaries completed and submitted to RAC Chairperson. RAC Chairperson conducts a participants' meeting. RAC Chairperson and the State(s) hold a public meeting.
ED + 10	Official notification of identified deficiencies through letter from FEMA Regional Director (RD) to State, NRC HQ and RAC, with information copy to licensee.
ED + 20	State acknowledges receipt of deficiency letter and proposes schedule of remedial actions, if required.
ED + 30	Draft FEMA summary exercise report is sent to FEMA HQ for review.
ED + 50	Summary exercise report provided by FEMA RD to States, NRC HQ, and RAC, with information copy to licensee.
ED + 120	Draft exercise report provided by FEMA Region to State and RAC for review and comment.
ED + 190	Final exercise report issued.

## 4.0 Scenario Package Development

### 4.1 Objectives And Extent Of Play

Observe the following guidance whenever possible:

- a. Review previous drill and exercise reports to determine the appropriate extent of play required to support both the onsite and off-site objective demonstration plans.
- b. Implement plans and procedures to the fullest extent possible.
- c. Avoid player pre-staging.
- d. Minimize simulated interfaces and organizations.
- e. Once the objectives and extent of play have been "finalized," minimize changes.
- f. Develop a listing of proposed mini-scenario titles and/or needs in conjunction with the objectives and extent of play, and circulate for review accordingly.

### 4.2 Scenario Preparation

Observe the following general guidelines regarding scenario preparation whenever possible:

- a. When all objectives and extent of play have been finalized, commence detailed scenario preparation.
- b. Scenario writers should have detailed plan knowledge of the area for which they are preparing the scenario material.
- c. The person responsible for preparing a scenario section should be the person who will control that portion during the drill or exercise.

### 4.3 Scenario Package Format

Develop scenario package sections in accordance with the outline below. The appointed Drill or Exercise Manager coordinates development of scenario related material. Scenario packages may be edited to delete unnecessary sections or information. Deleted sections will be identified with a section cover sheet in the drill manual documenting reason for the section not being used.

#### 1.0 Objectives and Extent of Play

Objectives are determined using the NEPSD six year objective plan. This plan is included as an attachment to this instruction and is updated at least annually.

Extent of play must be approved by a senior representative of each participating organization.

In addition to the objectives, this section contains information which will be used in conducting a given drill or exercise. It will establish any play limitations and simulations (e.g., control cells, simulated displays, etc.).

## 2.0 Controller Instructions

This information is adapted to meet the needs of a specific drill or exercise. Also included in this section are controller assignments and controller telephone lists. This section describes the Control Cell and out of sequence mini-scenario controller actions. Rules for visitors are also included in this section.

## 3.0 Sequence of Events

This section contains the details of the scenario sequence. Included in this section is a discussion of the initial conditions, simulator malfunctions to be inserted, cross reference to messages and mini-scenarios, and the expected times for each scenario event occurrence.

## 4.0 Organizational Response timelines

This section contains a summary of the key scenario events and the expected time of occurrence.

## 5.0 Messages

This section contains command and contingency messages necessary to ensure that the correct information is provided to the players or to ensure that the scenario timeline remains valid if players fail to perform a required action during a specific time period.

## 6.0 Mini-Scenarios

Mini-scenarios are organized by response organizations and will reference any messages in Section 5.0 which support their implementation. Mini-scenarios can be recognized in the normal scenario sequence or can be run out of sequence.

## 7.0 Plant Parameters

This section includes relevant operational data.

## 8.0 Radiological Data

This section contains radiological, meteorological and radiochemistry data.



- 4.4 The Drill/Exercise Manager will interface with onsite and off-site departments to obtain resources identified by the Drill & Projects Lead as necessary for scenario development
- 4.5 The appointed Drill & Projects Lead directs development of scenario package sections in accordance with the approved planning schedule. These activities will typically be conducted in the following manner:
- a. Establish the Drill or Exercise Project Team(s) with representatives from the following groups and organizations (including State personnel for off-site scenarios) as needed:
    - 1. Emergency Planning Services Drill & Projects member to lead scenario development.
    - 2. Radiological Assessment Branch
    - 3. Health Physics
    - 4. Operations
    - 5. Operator Training
    - 6. Technical Training
    - 7. Security

This group directs scenario development and review, and establishes project management controls assuring schedule completion.

- b. Develop a draft of the proposed scenario timeline.
- c. Issue the proposed scenario to selected Team members for review and comment.
- d. Obtain and resolve comments.
- e. Issue assignments to appropriate personnel for development of the remaining scenario package sections.
- f. Meet with Team members to obtain input as required to support scenario development activities.
- g. Following completion of development activities, the draft scenario package will be assembled and distributed to selected team members for final comment.
- h. Obtain and resolve final scenario package comments.
- I. Provide copies of scenario package to EPCs for review and approval.

- 4.5 The Drill or Exercise Manager is responsible for obtaining required approvals of scenario packages.
- 4.6 The Drill & Project drill lead will develop a matrix of scenario section assignments per controller/evaluator. This list will be used to reproduce the required number and type of scenario packages.
- 4.7 The Drill & Project drill lead will coordinate distribution of the exercise scenario. Exercise scenario packages will be kept in a locked container or room until issued.

4.8 PASS Drill Requirements

4.8.1 PASS drills will be performed once per Unit per year. During the six year objective cycle, each Unit will perform at least one PASS drill involving sampling of each of the following paths:

- a. reactor coolant system
- b. containment/drywell air
- c. containment sump/torus

4.8.2 Samples may be simulated if plant conditions or other circumstances will not support drawing samples and concurrence is received from Station Management.

4.8.3 PASS drills will include the following objectives:

- a. Post Accident Sampling and Analysis
- b. Radiological Exposure Control
- c. Communications and Information Flow
- d. Implementation of On-Site Protective Actions pertaining to PASS team activities.

4.8.4 Drills involving drawing samples will be timed. The acceptance criteria will be measured in accordance with implementing procedures.

4.8.5 In addition to the above requirements, each of the following analyses are required to be performed at each Unit at least once during the six year cycle:

- a. Liquid Samples
  - 1. Liquid isotopic
  - 2. Gaseous isotopic

3. Total Dissolved Gases
  4. Chloride
  5. Boron
  6. pH
- b. Air Samples
1. Isotopic Activity
  2. Gaseous Composition

## 5.0 Drill And Exercise Preparation

Attachment 6 provides generic action lists for specific onsite drill and exercise activities. Since each drill or exercise is unique, the appointed Drill or Exercise Manager will use these generic action lists to create a specific project management schedule sufficiently detailed to direct the scope and extent of play determined appropriate for the drill or exercise to be scheduled.

### 5.1 Tasks typically performed by the Emergency Planning Services Department include:

- a. Review previous drill reports and determine weaknesses and lessons learned for incorporation into new drill scopes.
- b. Develop draft objectives and extent of play. Distribute for review and incorporate comments as required. Coordinate required State and Federal reviews and approvals as necessary. Finalize objectives and extent of play.
- c. Conduct a drill and exercise planning meeting(s). Develop and distribute drill schedules, scopes, etc. Incorporate comments as required.
- d. Assemble a Drill or Exercise Project Team.
- e. Develop the scenario package in accordance with approved objectives and extent of play. Distribute for review and incorporate comments as required. Coordinate required State and Federal reviews and approvals as necessary.
- f. Coordinate use of the station simulator.
- g. Review proposed drill dates and station status with Station management. Ensure that drill date is placed in appropriate station schedules and that a Station Notice is prepared and distributed.
- h. Provide specific requests for drill or exercise preparation support to appropriate State personnel. This may include assistance with:

1. assignment and notification of personnel (by position),
  2. arrangements for use of designated facilities,
  3. dissemination of event reporting times and expected durations, and
  4. provisions for any additional supporting resources.
- i. Identify type of props to be used for mini-scenarios.
  - j. Coordinate scenario reproduction and determine appropriate security requirements. Arrange for scenario package assembly including binders, tabs and covers.
  - k. Identify and notify players and controllers.
  - l. "Freeze" procedure/plan changes prior to an exercise.
  - m. Prepare player and controller briefing materials as required. These may include outlines, procedure packs, scenario props, drill phone directories, etc.
  - n. Determine the extent of prerequisite knowledge or experience required for controllers and evaluators. Conduct a pre-drill briefing to instruct controllers and evaluators on their assignments and responsibilities.
  - o. Coordinate onsite facility catering arrangements.
  - p. Coordinate onsite facility/equipment checks prior to the scheduled event to ensure program adequacy. Coordinate implementation of appropriate corrective measures, as necessary.
  - q. Develop and establish a drill control cell, if necessary.
  - r. Verify that responsibilities of other groups have been completed.
  - s. Maintain security of the scenario until the drill or exercise has been completed.
  - t. Conduct participant team-building sessions, as needed.
  - u. Conduct the scheduled drill or exercise activity.
  - v. Collect all drill and exercise documentation.
  - w. Conduct player and controller debriefings.
  - X. Prepare onsite drill reports.
  - y. Input drill attendance data in training files.

- z. Coordinate restoration of onsite facilities, as needed.
- aa. Provide player feedback, as necessary.
- bb. Develop public information notices regarding drills and exercises (good neighbor notifications).
- cc. Coordinate review of proposed drill scopes with community leaders.
- dd. Monitor the scheduled communities to determine player participation levels.
- ee. Conduct and document a critique of each drill or exercise
- ff. prepare and categorize CRs based on critique discussions.

## 5.2 Exercise Scenario Security

This section provides instruction for the physical security of exercise scenarios. This security is required to prevent unauthorized disclosure of the scenario prior to the conduct of the exercise for which it is intended.

### 5.2.1 Authorized Personnel For Scenario Preparation

The following personnel are authorized access to exercise scenario material provided they are not assigned as a player in that exercise. In those cases, the authorized individual should designate someone else to assume his or her responsibilities.

- a. Manager, Nuclear Emergency Planning Services
- b. Appointed Drill or Exercise Manager
- c. Appointed Drill or Exercise Management Team Members

As appropriate to preparation requirements, these individuals may designate other personnel who should have access to scenario material, e.g., Administrative Support Staff, etc.

### 5.2.2 Work Areas

To the degree possible, exercise scenario preparation should be performed within Emergency Planning Services offices, at Millstone, Connecticut Yankee or Seabrook. Work areas should be designated and/or approved by the Drill or Exercise Manager.

### 5.2.3 Scenario Identification

All exercise scenario documents (or their containers or cover sheets) will carry a notice to the effect that the material is "scenario-related" (regulatory submittal)

or "confidential" (in-house). Draft scenario material will also contain a draft date.

#### 5.2.4 Scenario Storage

Exercise scenario material in hard copy form shall be secured in a locked file cabinet and/or locked room when not in use. When not secured, hard copy material shall not be left unattended.

Portable magnetic or optical storage media containing exercise scenario material shall be secured in a locked file cabinet and/or locked room when not in use. This includes floppy disks, optical disks, tapes, etc.

#### 5.2.5 Scenario Routing And Transmittals

Exercise scenario material shall be either hand-delivered or mailed through a traceable delivery system (e.g., US Postal Service Registered Mail, overnight delivery service, etc.). Scenario material shall be transmitted in a container (e.g., envelope, binder, box, etc.) that identifies the contents as "scenario information" or "confidential".

#### 5.2.6 Scenario Reviews And Approvals

Exercise scenarios are subject to technical, management, regulatory and independent reviews and approvals. In some instances, the scenario will leave the direct control of NNECO personnel. In all cases, reviewers and approvers shall be notified either verbally or in writing that the material they are examining is confidential and not to be disclosed to unauthorized personnel.

#### 5.2.7 Contracted Preparation Services

In some instances, contracted support services may be utilized for preparation of graded exercise material. Firms providing this service shall be directed to perform their work in accordance with this section. Requested exemptions from, or changes to, the requirements of this section shall be directed, in writing, to the Manager, Nuclear Emergency Planning Services.

#### 5.2.8 Reporting Violations

The unauthorized disclosure of exercise scenario-related information shall be reported to the Drill/Exercise Manager who will determine the impact of the disclosure on exercise confidentiality, and recommend appropriate corrective actions to the Manager, Nuclear Emergency Planning Services.

A compromise of the exercise scenario shall be reported to the NRC and/or FEMA. Examples of a compromise are:

- a. the scenario is known to multiple players and the removal of those players or the use of other participants is not feasible, or

- b. parties not authorized by NNECO are in possession of the scenario.

The Manager, Nuclear Emergency Planning Services will coordinate subsequent corrective actions with these agencies.

A Condition Report (CR) shall be generated in accordance with RP-4, "Corrective Action Program."

## 6.0 Drill And Exercise Evaluation

This section describes requirements for evaluating drills and exercises. Evaluations are based on comments and observations from drill and exercise participants. Typical steps in this process are listed below:

1. Controller Briefing
2. Controller Observation and Summary
3. Controller and Player Debriefing
4. Individual Controller Logs (EPDP FORM A)
5. Submittal of Controller/Player Comment Forms (EPDP FORM B)
6. Action Item (AI) Database Input
7. Drill/Exercise Reports
8. Comment Resolution Tracking
9. AI Close-out
10. Player Feedback

### 6.1 Controller Input

Following termination of a drill, players shall be directed to restore facilities to their original state of readiness. Controllers shall use this time to summarize their observations and provide these to the Facility Lead Controller. Facility Lead Controllers shall then lead a critique of drill activities at their assigned emergency response facility. Player and controller comments shall be solicited during critiques and the Facility Lead Controller shall ensure that all comments are documented.

Prior to beginning a critique, controllers shall distribute (or otherwise make available) copies of EPDP Form B, Millstone Station SERO Comment Form, to all participants. Players and Controllers may submit comments using this form.

Critiques should last a maximum of 30 minutes. Controllers should attempt to disposition as many comments as possible, but avoid commitments that are beyond the authority of the controller organization.

Facility Lead Controllers shall collect all player and controller-generated documents including critique comments, logs, attendance sheets, SERO Comment Forms, etc. for their facility. They should make and retain copies as desired, and provide all original material to the Drill or Exercise Manager.

The Drill or Exercise Manager will compile and review all comments, and determine which comments require subsequent action, review or evaluation. These comments will then be input into a data base with unique tracking numbers assigned.

## 6.2 Drill/Exercise Reports

The Drill/Exercise Manager will prepare, or direct preparation of, a report concerning SERO performance for each drill or exercise. In general, these reports will document the drill date and participating SERO organizations, state any drill program requirements being satisfied (e.g., a radiological monitoring drill, an HP drill, etc.) and the overall outcome, contain a brief summary of the scenario, and discuss any major issues. Drill reports dealing with off-site agency responses (e.g., State and local) may be prepared at the discretion of the Manager, Nuclear Emergency Planning Services. Drill report distribution will be determined by the Manager, Nuclear Emergency Planning Services.

## 6.3 Comment Resolution Tracking

Drill or exercise comments will be processed in accordance with Attachment 6. Condition Reports shall be generated in accordance with the guidance of RP-4. As a minimum a Level 3 CR shall be written as a Self Assessment. Drill or exercise comments requiring corrective action will be inputted through the CR process. As needed, meetings may be convened to allow responsible groups or agencies to address comments, and to confirm the responsible group/individual.

In addition, but not in place of the Corrective Actions process, a Drill/Exercise comment database may be used to support EPSD analysis needs. The Drill Comment Data Base should contain, as a minimum, the following fields:

Comment Number	Drill/Exercise Title	Objective
Comment Type	Source of Comment	Affected ERF
ERF Lead Controller	Affected SERO Position	Comment Description

## 6.4 SERO Player Feedback On Drill/Exercise Comments

Depending upon the drill scope, the Drill/Exercise Manager may review drill or exercise performance at meetings with NNECO management. It is expected that management personnel will discuss the information from these meetings with their respective department personnel.



A response concerning the disposition of a comment will be made directly to any individual that requests such a response using an SERO Comment Form (Attachment 4).

Additional vehicles for player and controller feedback on the results of a drill or exercise, or the disposition of selected comments, may be determined by the Manager, Nuclear Emergency Planning Services, as needed (e.g., Millstone or CY Today articles, e-mail, SERO Bulletin Board messages, etc.).

## 6.5 Exercise Critiques

To facilitate attendance by key station response personnel, exercise critiques should be conducted at a location inside the Protected Area (e.g., Building 475). When finalized, schedule information concerning the exercise critique should be included as a To The Point item.

Exercise critiques should be led by the Drill/Exercise Manager. The critique should include a presentation from each facility lead controller concerning the performance of each SERO facility. Critiques should include straightforward observations and discussions of performance weaknesses and areas needing improvement or further evaluation.

Exercise critique attendees should include at a minimum:

**From the exercise SERO:** the DSEO, ADTS, MOSC, ADEOF, MTS, AMT

**From normal station organization:** Unit Director, SERO Team Captain, Operations Manager, Manager of Emergency Planning Services, and representatives from Licensing and Quality Assurance

Drill and exercise critiques shall meet the requirements of 10CFR50.47(b)(14) and Appendix E to 10CFR50, Section F.2.g. To meet this requirement each Lead Facility Controller shall request drill/exercise participants to discuss their observations and comments following the activity. This information shall be reviewed and discussed with the drill/exercise manager and lead controller staff. Draft CRs will be developed and presented to station management during the formal critique of the activity. Based on review by station management, each issue will be dispositioned by a formal CR. Separate CRs will be written for issues required to be corrected and for issues that are determined to be "areas for improvement". CRs will be developed and processed in accordance with RP-4 and finalized within 24 hours of the formal critique with station management.

## 7.0 Maintenance Of Records

### 7.1 General

All drill and exercise materials will be maintained in accordance with Emergency Planning Services Department instructions on document maintenance and storage.

## 8.0 Emergency Responder Achievement Recognition

### 8.1 General

The purpose of this program is to recognize personnel who participate in exercises and their service as a CT SERO member.

Personnel who have completed required Emergency Plan Training satisfactorily and participated in an evaluated exercise may be eligible to receive an award in recognition of their achievement.

Unless the Manager, Nuclear Emergency Planning Services directs otherwise, the typical award will be a certificate of exercise participation.

### 8.2 Certificate Design/Production/Distribution

The appointed Exercise Manager will obtain the Manager, Nuclear Emergency Planning Services' approval on the selection of the certificate design or will be directed to coordinate the purchase of alternative achievement awards. All purchases of award items will be made in accordance with the company procedures and policies. The distribution of the award to SERO members will be coordinated by Emergency Planning Services upon completion and final review by the Exercise Manager. Off-site organization achievement awards distribution will be coordinated through the appropriate State emergency management agency.

### 8.3 Eligibility of Personnel

The Exercise Manager will verify onsite emergency response organization eligibility. The appointed members of the Exercise Management Team representing the State of Connecticut and the State of Rhode Island will be responsible for submitting a participant list to the Exercise Manager for certificate production.

## 9.0 Unplanned Outages/Events Affecting Drills/Exercises

### 9.1 General

This section provides a framework for dealing with the effects/impact of an event such as an unplanned outage or other event, e.g., hurricane, etc., which might require the cancellation or rescheduling of a major drill or exercise.

The concurrence of the Manager, Nuclear Emergency Planning Services is required prior to rescheduling any drill or exercise or initiating any action to request an exemption to a licensing commitment.

The Director, Regulatory Affairs shall be notified when any action is initiated regarding the need to cancel or reschedule a drill or exercise involving, or expected to involve, Nuclear Regulatory Commission (NRC) or Federal Emergency Management Agency

(FEMA) personnel and will be the contact person in the event that an exemption to an existing commitment to either the NRC or FEMA is sought.

### 9.2 Unplanned Outage/Reschedule

The Manager, Nuclear Emergency Planning Services will review the impact with the appointed Drill or Exercise Manager and develop an action plan. If the scheduled event requires cancellation or rescheduling, the Manager will coordinate notification of the Director, Regulatory Affairs. The Manager, Nuclear Emergency Planning Services will direct notification and concurrence of State agencies involved while ensuring that all other contractors, emergency responders, and organizations involved are advised of the rescheduling/cancellation.

### 9.3 Licensing Exemption

The Manager, Nuclear Emergency Planning Services will determine if an exemption to a licensing commitment on drills/exercises can be considered. The appointed Drill or Exercise Manager will prepare documentation supporting the exemption request. The Manager of Emergency Planning Services will forward the request to the Director, Regulatory Affairs. The Director, Regulatory Affairs will process and coordinate the exemption request with appropriate Federal Agencies, and will notify NNECO executive management of the final resolution. The Manager, Nuclear Emergency Planning Services will direct implementation of the resolution.

## 10.0 Post-Drill 24/7 Criteria

10.1 The primary responsibility for ensuring that each emergency facility is 24/7 lies with the emergency responders located in that facility. While it is not intended that they provide replacement materials, it is expected that they will:

- a. Return their specific work area to its pre-drill/event conditions (general housekeeping).
- b. Identify missing or out-of-stock plans, procedures and other documents utilized in that position.
- c. Identify shortages of administrative supplies and consumables utilized in that position.
- d. Identify inoperative or improperly operating equipment utilized in that position.

Drill controllers, through briefings and debriefings, should encourage "player" restoration of facilities. Deficiencies identified as noted above should be brought to the attention of the Drill/Exercise Manager.

When a particular deficiency is noted that does not fall clearly under the actions of this section, the Manager, Nuclear Emergency Planning Services shall make the initial

determination as to urgency of correcting that item ensure it is corrected in accordance with the Emergency Planning Services Department Facility Manual.

In addition, quarterly facility surveillances will be performed, in accordance with the Emergency Planning Services Department Facility Manual, as part of the facility deactivation process for drills, exercises and actual events.

#### 10.2. Procedure Checklist, Player Packets, Maps And Forms

Wherever practical, separate quantities of applicable documentation should be provided and designated as "Drill Use Only" and "Emergency Use Only." Documentation designated as "Emergency Use Only" should be sealed or otherwise distinguished to preclude non-emergency use. "Drill Use Only" materials should be provided by Emergency Planning Services staff and delivered and returned by the appropriate drill controller.

#### 10.3 Administrative Supplies And Consumables

Adequate quantities of administrative supplies and consumables (pens, paper, staples, etc.) shall be stocked to allow for occasional use during drills, exercises and training.

Administrative supplies and consumables shall be included in routine facility inventories and restocked as required.

In the event that a facility is activated for emergency use, administrative supplies and consumables shall be restocked as required by the inventory of that facility, or portion of a facility. That inventory shall be performed by Emergency Planning Services personnel following termination of the emergency response.

#### 10.4 Equipment

It is not expected that emergency response plans and equipment will be expended for drill and exercise use.

Clocks, computers, etc., which are set to support a drill scenario shall be restored to real time upon completion of the drill by the lead controller for the applicable facility.

Equipment noted to be inoperative or not operating as expected shall be brought to the attention of the Emergency Planning Services Department and restored in accordance with the Emergency Planning Services Department Facilities Manual and EPAP 1.15.

## 11.0 Definitions

<b>Action Item Database (EPSTAR)</b>	The system used to track incomplete or open action items, assign persons to take corrective actions, and monitor progress until the close-out of the item.
<b>Combined Functional Drill</b>	Any drill which is similar in scope and complexity to an exercise
<b>Connecticut Department of Environmental Protection (DEP)</b>	The lead State of Connecticut agency responsible for coordinating and directing responses to radiological sampling needs.
<b>Connecticut Office of Emergency Management (OEM)</b>	The lead State of Connecticut agency responsible for coordinating and directing responses to disasters and emergencies.
<b>Controller</b>	Person responsible for facilitating the progress of a drill or exercise, observing player performance, and assessing whether objectives have been demonstrated. Controllers are selected on the basis of emergency preparedness training or direct experience.
<b>Controller Debriefing</b>	A meeting for controllers, evaluators and observers conducted by the Facility Lead Controllers and/or the Drill or Exercise Manager. This meeting is held following a drill or exercise to identify strengths and weaknesses, and summarize observations
<b>Critique</b>	A session for players, controllers, evaluators and observers conducted by the Facility Lead Controller after a drill or exercise and usually following the controller debriefing. Its purpose is to review strengths and weaknesses of the drill or exercise.
<b>Drill</b>	A supervised instruction period conducted to improve the emergency responders' performance and proficiency
<b>Drill or Exercise Manager</b>	Individual with overall responsibility for the execution and evaluation of a drill/exercise. This position is normally filled by a Manager, Nuclear Emergency Planning Services or a Senior Emergency Planning Services Coordinator.
<b>Evaluator</b>	Individual assigned to a drill or exercise whose function is to assess the performance of players. Controllers often perform the evaluator functions
<b>Exercise</b>	An event that tests the integrated capability of emergency response organizations and plans, and is evaluated by Federal agencies. Exercises are licensing requirements for nuclear facilities.
<b>Facility Lead Controller</b>	A person responsible for a group of controllers at a specific facility or location

<b>Mini-scenario</b>	A scenario developed for a group of players or a specific functional area contained within the overall drill or exercise scenario. Its function is to provide added player activities or details related to the overall scenario. Mini-scenarios are an important element of the scenario package in that they may provide the means for the demonstration of specific drill objectives.
<b>Observer</b>	A person assigned to a drill or exercise whose function is to witness drill action. An observer has no control functions during a drill or exercise.
<b>Participant</b>	An individual officially involved with a drill or exercise as a player, controller or evaluator.
<b>Player</b>	An emergency responder who performs assigned functions during a drill and exercise
<b>Rhode Island Emergency Management Agency (RIEMA)</b>	The lead State of Rhode Island agency responsible for coordinating and directing responses to disasters and emergencies.
<b>Scenario Package</b>	The primary implementing document for a drill or exercise. Scenario packages contain controller-related instructions, a description of the accident scenario, and required data and information. These packages are distributed to controllers, evaluators and observers.
<b>TableTop</b>	A drill conducted with lead SERO managers to foster communication improvements and to ensure understanding of each manager's needs from other members of the organization during an event. Typically, this drill will be conducted as a round table discussion.
<b>Visitor</b>	An individual authorized to attend a drill or exercise without player, controller or evaluator responsibilities.
<b>Walk-through</b>	Supervised instruction where individuals gain hands-on experience and knowledge in the use of emergency procedures, equipment and facilities. During walk-throughs, on-the-spot correction of performance will be offered by the controller(s). Instructional methods such as demonstrations, and simulations may be employed.

## 12.0 References

1. FEMA-REP-14, Radiological Emergency Preparedness Exercise Manual, September 1991.
2. FEMA-REP-15, REP Exercise Evaluation Methodology, September 1991.
3. NUREG-0654/FEMA-REP-1, Rev. 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness for Nuclear Power Plants, November 1980, and SUPP. 1, Criteria for Utility Off-site Planning and Preparedness, September 1988.
4. NRC Inspection Procedure 82301, Evaluation of Exercises for Power Reactors
5. NRC Inspection Procedure 82302, Review of Exercise Objectives and Scenarios for Power Reactors
6. State of Connecticut Radiological Emergency Response Plan.
7. State of Rhode Island Radiological Emergency Response Plan.

Attachment 1 Drill/Exercise Controller Log

Drill/Exercise: \_\_\_\_\_

Drill/Exercise Date: \_\_\_\_\_

Controller's Name (print): \_\_\_\_\_

Controller's Location/Assignment: \_\_\_\_\_

Observations should include the proper and effective use of procedures, equipment and personnel. Comments concerning drill performance should document: the time of observation, personnel or equipment involved, procedures involved, and the impact that the condition had on the ability of the player organization to meet its objectives.

TIME	OBSERVATION

Page \_\_\_\_\_ of \_\_\_\_\_

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Attachment 2 Drill/Exercise Attendance Roster

Drill/Exercise: \_\_\_\_\_

Drill/Exercise Date: \_\_\_\_\_

ERF/Location: \_\_\_\_\_

NAME (Please Print)	PLAYER/ CONTROLLER	ASSIGNMENT	SIGNATURE

Attachment 3 Controller Evaluation Form

CONTROLLER NAME \_\_\_\_\_

DATE \_\_\_\_\_

POSITION/AREA \_\_\_\_\_

TEAM \_\_\_\_\_

PLAYER(S) NAME \_\_\_\_\_

**SERO PERFORMANCE EVALUATION**

Drill Participation

*When observing drill participants, use the following to determine their competency in performing in their assigned function. In each area, be sure to describe exactly how they did or did not meet all objectives.*

<p><b>Objective 1:</b> Demonstrate the ability to recognize station conditions and parameter trends as emergency plan initiating conditions, and to develop potential solutions for placing the station in a safe, stable condition.</p>	<p>SM, ADTS, TSC SRO</p>
<p><b>Objective 2:</b> Demonstrate the capability to detect and classify an incident based on plant conditions and emergency action levels.</p>	<p>SM, ADTS</p>
<p><b>Objective 3:</b> Demonstrate the capability to promptly notify Station responders of emergency conditions, and emergency classifications.</p> <p>Demonstrate the capability to promptly notify off-site officials, including the NRC, of emergency conditions, and emergency classifications.</p>	<p>SM, ST, CR DSEO, EOF DSEO, MOC</p>
<p><b>Objective 4:</b> Demonstrate the capability to initiate and maintain communications between appropriate emergency response personnel.</p> <p>Demonstrate the ability to effectively communicate key information between facilities.</p>	<p>ALL SERO</p>
<p><b>Objective 5:</b> Demonstrate the capability to confirm and continually assess the habitability of the emergency response facilities.</p> <p>Demonstrate the capability to properly implement appropriate iodine-protective measures (use appropriate respiratory protection or take KI).</p> <p>Demonstrate the capability to provide at risk on-site personnel with adequate protective equipment</p>	<p>EOF DSEO, MRCA</p>
<p><b>Objective 6:</b> Demonstrate the ability to formulate Protective Action Recommendations</p>	<p>EOF DSEO, ADEOF, MRDA</p>
<p><b>Objective 7:</b> Demonstrate the ability to mobilize the station emergency response organization and activate station emergency response facilities in a timely manner.</p>	<p>ALL SERO</p>

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<b>Objective 8:</b> Demonstrate the ability of on-shift personnel to implement the station emergency plan and to transfer appropriate emergency-related functions to other emergency response organization personnel.	CR DSEO, ADTS, EOF DSEO
<b>Objective 9.</b> Off-hours staffing	
<b>Objective 10:</b> Demonstrate the ability to coordinate the preparation, review and release of public information, and to provide timely and accurate information to the media and general public.	ADEOF, MPI
<b>Objective 11.</b> Use of fire control teams	
<b>Objective 12.</b> Use of first aid/ rescue teams	
<b>Objective 13.</b> Use of medical support personnel	
<b>Objective 14.</b> Use of licensee headquarters support personnel	
<b>Objective 15.</b> Use of security personnel to provide prompt access for emergency equipment and support	
<b>Objective 16.</b> Use of backup communications	
<b>Objective 17.</b> Demonstrate the ability to establish an effective rumor control program	
<b>Objective 18.</b> USE OF EMERGENCY POWER	
<b>Objective 19.</b> EVACUATION OF EMERGENCY RESPONSE FACILITIES	
<b>Objective 20:</b> Demonstrate the ability to mobilize and direct field monitoring teams [ <i>as part of annual radiological monitoring drill</i> ].	FTDC, MRDA
<b>Objective 21:</b> Demonstrate the capability for determining the magnitude and impact of the particular components of a release.	MRDA, RAE, AMRDA
<b>Objective 22.</b> Capability for determining magnitude and impact of release components	
<b>Objective 23.</b> Capability for post-accident coolant sampling and analysis	
<b>Objective 24.</b> USE OF POTASSIUM IODIDE	
<b>Objective 25.</b> ASSEMBLY AND ACCOUNTABILITY	

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Objective 26. RECOVERY AND RE-ENTRY	
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Attachment 4 Player/Controller Comment Form

**Instructions:** Record all findings below. Proposed corrective actions can be provided (optional) on a separate sheet of paper and attached.

Drill Title: \_\_\_\_\_ Date: \_\_\_\_\_  
 Name: \_\_\_\_\_ Phone: \_\_\_\_\_ Date: \_\_\_\_\_  
 ERF Lead Controller \_\_\_\_\_

Objective #	Affected ERF*	Description	Affected SERO Position	
			Primary	Other

\* Choose the affected ERF from the following list:  
 EOC/Armory   CR/Sim   Rad Area   TSC/OSC   COD (Control of Drill)

Do you wish to receive a reply (optional): \_\_\_ Yes \_\_\_ No

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Attachment 5 Typical Drill/Exercise Tasks

ACTIVITY	ASSIGNED TO	DUE DATE	COMPLETE
Drill Manager Assigned			
<b>Develop Project Schedule</b>			
Develop generic schedule/agenda for coordinator meetings			
Develop project organization/responsibilities.			
Establish task force for off-site exercise preparation activities			
Select Drill/Exercise Dates/Times			
Adjust Baseline Schedule			
Determine methods for schedule dissemination to responders			
Project Schedule Approved			
<b>Acquire Development Team</b>			
Coordinate Typing Support Resources			
Obtain Resources from Lead Managers / Directors			
Appoint 1 individual to oversee scenario developers			
Determine NRC play requirements			
Advise Seabrook Station of Needs			
Develop specific work plan for key agencies			
Development Team Acquired			
<b>Develop Team Assignments</b>			
Customize team tasking assignments			
Develop Generic Sections 1 & 2 - ERO			
Brief Affected in-house groups on Drill Dates			
Reserve STATE EOC			
Reserve EOF/TSC			
Reserve Simulator			
Schedule Briefing Rooms - SERO			
Develop plan detailing state role/responsibilities			
Kick-off Meeting Held			
<b>Develop Scope &amp; Objectives</b>			
Review Last On-site Exercise Inspection (CY&MP)			
Review On-site 6 year plan			
Develop Draft On-site Objectives/Extent Of Plan			

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ACTIVITY	ASSIGNED TO	DUE DATE	COMPLETE
Distribute proposals			
Facilitate locals/plant management. review of EOP			
Reconcile Comments Onsite/Off-site			
Issue Final Draft			
Scope and Objectives Approved			
<b>Develop Scenario Time Line</b>			
Meet With Operations and Nuclear Training Department developers			
Test Simulator Feasibility			
Meet again and revise as necessary			
Propose to EPCs			
Reconcile comments			
Scenario Time Line Approved			
<b>Identify / Inform Participants</b>			
Issue Player Request Memo to Lead Managers			
Issue Controller Special Request Memo to Managers			
Issue Off-site Player/Controller Request Memo			
Notify Off-site Resource/Facility Providers			
Notify Players - Onsite			
Notify Players - Off-site			
Notify Controllers - Onsite			
Notify Controllers - Off-site			
Reconcile Changes			
Notify Changed out personnel			
Participants Acquired / Notified			
<b>Develop Scenario Package</b>			
Develop & implement scenario controls			
Develop Controller Manual - 3.1			
Develop Maintenance Mini-Scenarios			
Develop Meteorological Data			
Develop Chemistry / PASS Data			
Develop Source Term Data			
Develop Off-site Radiological Data			
Develop On-site Radiological Data			
Develop Drill Messages			
Establish scenario review committee			
Issue Package for review			
Reconcile Comments			
Scenario Package Approved			

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ACTIVITY	ASSIGNED TO	DUE DATE	COMPLETE
<b>Management Review</b>			
Action Item Review Meeting			
Issue 30-Day Action Item Look ahead Report			
<b>Prepare Participants</b>			
Determine methods for schedule dissemination to responders			
Issue Player Instructions			
Print / Distribute Manuals			
Reproduce/Assemble Packages			
Develop Player/Controller Phone Lists			
Reproduce/Assemble Player/Controller Materials			
Plan / Conduct On-site Briefing & Training			
NU Nuclear News Article			
Issue "To The Point" notice			
Site Notice to Executive Office			
Brief NRC Resident			
Controllers Trained / Briefed			
<b>Drill Readiness</b>			
Coordinate Media Notification w/Corp Comm			
Distribute Player / Controller Phone list			
Switch over OFIS feed to applicable simulator			
Install simulator phone templates			
Switch over simulator phone switches			
Issue any initial Conditions Messages to applicable players			
Clean out OFIS buffer			
Pre-position sample/KI props			
Visitor list to Security			
Conduct Onsite Controllers Briefs			
Coordinate NRC Entrance Brief			
Schedule MP Security/Police Officer for Access Road			
Ensure monitoring vehicles ready			
Conduct Off-site Controller Brief			
Conduct Off-site Player Brief			
Provisions for exercise photography			
Good Neighbor Notifications			
FEMA Evaluator Briefing - CT			
FEMA Evaluator Briefing - RI			
Arrange NRC Training/workspace			
Catering Arrangements			
Perform ENRS Switchover			
Ensure Drill Readiness			
<b>Post Event Facility Deactivation</b>			

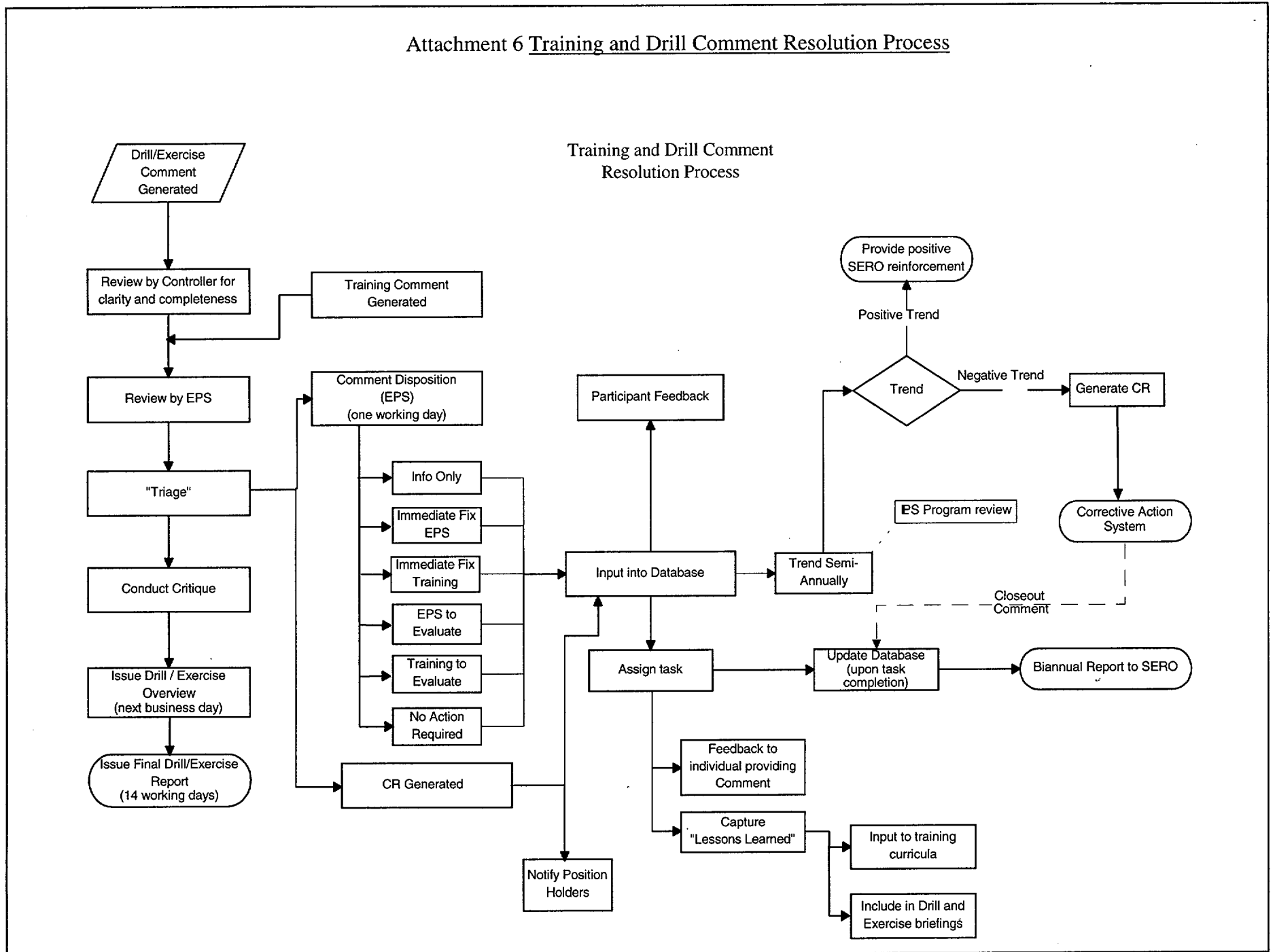
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ACTIVITY	ASSIGNED TO	DUE DATE	COMPLETE
Remove simulator phone templates			
Switch over simulator phone switches			
Ensure all catering supplies are removed from facilities			
Ensure monitoring vehicles are back in proper parking spots and fuel is at least ¾ full			
Ensure all facility lockers are locked			
Collect all logs and player documentation			
Remove phone and computer carts from simulator			
Restore facility procedures to 24/7 condition			
Remove NAP/SAP drill announcement signs			
Contact Information Technology group to clean out manually entered OFIS screens			
Perform quarterly facility surveillances in accordance with EPSP Facility Manual			
<b>Prepare / Conduct Critiques</b>			
Develop critique presentation			
Debrief Players / Evaluators			
Compile Facility Comments			
Arrange for refreshments			
Present Critique To Management			
Reproduce Exercise Material for NRC/FEMA			
FEMA Public Meeting			
Conduct Critique			
<b>Issue Critique Memo</b>			
Draft Onsite Memo based on Critique findings			
Draft Off-site Memo based on Critique findings			
Final Report SERO			
Critique Memo Issued			
<b>Issue Drill Comments</b>			
Compile All Drill Comments from Leads			
Issue in Draft to EPC			
Hold Meeting to Disposition			
Modify Data Base and Issue			
Drill Comments Issued			
<b>Acknowledge Participants</b>			
Compile "As Run Participants List"			
Print Certificates			
Develop Memos / Letters			
Distribute Memos & Certificates			
Participants Acknowledged			
<b>File Documentation</b>			
Update Drill Participant Data Base			
Update Six Year Plan			
Send Scenario Package Records / Filing			
Send Attendance, Critique Memo and findings to Records / Filing			
Drill Documentation Filed			

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Attachment 6 Training and Drill Comment Resolution Process



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Attachment 7 Six Year Objective Plan

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1993		1994		1995		1996		1997				1998			
				MP2	CY	MP1	CY	MP3	CY	MP2	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY
Core Objectives																			
1	a.	<b>Accident detection and assessment</b>		9/22/93	3/27/93	11/17/94	5/14/94	10/5/95	4/8/95	11/21/96	8/14/96	8/21/97					X	X	X
		Parameter values & Rad levels established in procedures	I.1																
		Initial/continuing assessment using in-plant & containment Rad Monitors	I.2																
2	b.	<b>Emergency classification</b>		9/22/93	3/27/93	11/17/94	5/14/94	10/5/95	4/8/95	11/21/96	8/14/96	8/21/97					X	X	X
		Class & EALs in Emergency Procedures/Plan shall identify values & equipment	D.1																
		Initiating conditions in App. 1 and FSAR for facility.	D.2																
3	c.	<b>Notification onsite/offsite ERO</b>		9/22/93	3/27/93	11/17/94	5/14/94	10/5/95	4/8/95	11/21/96	8/14/96	8/21/97					X	X	X
		Procedures for notify response Org. of class/EALs & verification	E.1																
		Procedures for alerting, notifying & mobilizing response personnel	E.2																
		Site & State establish content of IRF	E.3																
		Ability to warn all personnel within owner controlled area	J.1																

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EPD Reference Number	NRC Insp. Number 82302 Index	Element / Description	NUREG 0654 Element	1993		1994		1995		1996		1997				1998				
				MP2	CY	MP1	CY	MP3	CY	MP2	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY	
Core Objectives																				
4	d.	<b>Communications</b>		9/22/93	3/27/93	11/17/94	5/14/94	10/5/95	4/8/95	11/21/96	8/14/96	8/21/97				X	X			X
		24 hr/day notify capability w/State/local Org's/Federal Org's/RMTs. Alert response Org & NRC com link	F.1																	
		Communications links for fixed and mobile medical support facilities exist	F.2																	
		Procedures for alerting, notifying, and mobilizing ERO	E.2																	
		Provide follow-up messages to offsite officials: classification, release & duration, met data, dose rates, PARs, prognosis for continuing or terminating release	E.4																	
		Sample, monitor and analysis; geophysical, met, rad monitors, dosimetry, laboratories- fixed or mobile	H.6																	
		At least one onsite and one offsite Com. system; each shall have a backup power source. Annual test of communications W/Federal ERO and systems between CR, TSC, EOF, State and Local ERO and RMTs.	8.1																	
		TSC has reliable voice and date communications W/CR, EOF. Reliable voice W/OSC, NRC OPS and State and local OPS.	8.2																	
		OSC has reliable voice Com W/CR, TSC & EOF.	8.3																	
		EOF has reliable voice and data Com W/TSC and CR; and voice Con W/OSC, NRC, State and local OPS.	8.4																	

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EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1993		1994		1995		1996		1997				1998			
				MP2	CY	MP1	CY	MP3	CY	MP2	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY
Core Objectives																			
5	e.	<b>Radiological exposure control</b>		9/22/93	3/27/93	11/17/94	5/14/94	10/5/95	4/8/95	11/21/96	8/14/96	8/21/97				X	X		X
		Establish exposure guidelines (EPA-400) for: removal injured person, corrective actions, assessment actions, first aid, decon, ambulance and medical treatment services.	K.1																
		Provide onsite rad protection program include exposure guidelines, ID position to authorize emergency worker above 10CFR20 limits. Procedures to allow exposures for life saving/emergency activities, shall include expeditious decision making and consideration	K.2																
		24 hr capability to determine doses, maintain records and a supply of dosimeters; self-reading and permanent devices.	K.3																
		Determine action levels to determine need for decontamination and supply the means to decon personnel, wounds, supplies, etc.	K.5																
		Onsite contamination control for access area; drinking water/food; criteria established for return to areas.	K.6																
		Provide for radiological monitoring of people evacuated from the site.	J.3																
		Make available for ERO respirators, protective clothing and radioprotective drugs.	J.6																
6	f.	<b>Protective action recommendation</b>		9/22/93	3/27/93	11/17/94	5/14/94	10/5/95	4/8/95	11/21/96	8/14/96	8/21/97				X	X		X
		Recommend PARs to State and local officials including EALS in accord W/App 1 and recommendations of tables 2.1/2.2. This includes-prompt notifications to offsite authorities within plume pathway.	J.7																

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1993		1994		1995		1996		1997				1998			
				MP2	CY	MP1	CY	MP3	CY	MP2	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY
Core Objectives																			
7	g.	<b>Staff augmentation</b>		9/22/93	3/27/93	11/17/94	5/14/94	10/5/95	4/8/95	11/21/96	8/14/96	8/21/97					X	X	X
		Plan identifies State, local, NRC and private organizations that are part of response ORG; each ORG shall provide 24 hr/day Emerg response and 24 hr/day manning of communications links.	A.1																
		Written agreements included in Plan.	A.3																
		Each principal ORG capable of 24 hr Ops including resources(tech, admin & mtl).	A.4																
		Need to specify Corp. Mgmt, admin and tech support who will augment plant staff; logistic support e.g., transportation, Com, temp quarters, special equip and supplies; tech support for planning/reentry/ recovery; Mgmt level interface W/Government authorities;	B.7																
		Need to specify contractor/private Organizations that could supply tech assist to and augment the ERO.	B.8																
		Need to ID services of local agencies, e.g., police, ambulance, medical, hospital, and fire fighting organizations; licensee provides transport/treatment for injured contaminated. Agreements in the plan.	B.9																

**Level of Use Information**

EPD Reference Number	NRC Insp. Number	Element / Description	NUREG 0654 Element	1993		1994		1995		1996		1997				1998		
				MP2	CY	MP1	CY	MP3	CY	MP2	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2
Core Objectives																		
8	h.	<b>Shift staffing</b>		9/22/93	3/27/93	11/17/94	5/14/94	10/5/95	4/8/95	11/21/96	8/14/96	8/21/97				X	X	X
		Licensee shall ID onsite ERO of plant staff for all shifts, responsibilities/duties.	B.1															
		Licensee shall designate emergency coordinator, on shift at all times W/authority and responsibility to initiate emergency actions, include PAR for offsite emergency measures.	B.2															
		Licensee shall ID succession for emergency coordinator and conditions for utility official to assume this function.	B.3															
		Licensee shall specify positions/tasks covering Table B-1 and able to augment on-shift shortly after a declared emergency.	B.5															
		Minimum staffing requirements for NRC licensee for nuclear power plant emergencies. Including functional areas, major tasks, position title or expertise and whether or not on shift or 30 or 60 minute response.	TABLE 2															

**Level of Use Information**

EPD Reference Number	NRC Insp. Index	Element / Description	NUREG 0654 Element	1993		1994		1995		1996		1997				1998		
				MP2	CY	MP1	CY	MP3	CY	MP2	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2
<b>Six Year Objectives</b>																		
9	a.	<b>Off-hours staffing/Unannounced (6pm to 4am)</b>  All major elements of the plan and organization are tested within the six year period. One exercise should start between 6pm and mid-night and another between mid-night and 6 am every six years. Exercises should be conducted under various weather conditions and some	N.1.b			12/14/94 * 11/30/94*												
10	b.	<b>Activation of emergency news center (Joint Information Center)</b>  Media centers designated for an emergency; includes space for limited number of news people at near site EOF.  Licensee shall have designated spokespersons, providing timely exchange of information; and must deal with rumors.	G.3  G.4			5/14/94	10/5/95		8/14/96	8/21/97								X
11	c.	<b>Use of fire control teams</b>  Conduct fire drills in accordance with T.S.(ok to monitor with NRC resident)  Implement training programs; initial and retraining for police, security and fire fighting personnel.	N.2.b  O.4.d							8/21/97				X	X			

**Level of Use Information**



EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1993		1994		1995		1996		1997				1998		
				MP2	CY	MP1	CY	MP3	CY	MP2	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2
<b>Six Year Objectives</b>																		
12	d.	<b>Use of first aid and/or rescue teams</b>				5/14/94		10/4/95										
		Licensee shall est. exposure guidelines (EPA) for; removal of injured persons; corrective actions; assessment actions; first aid; personnel decontamination; ambulance service; and medical treatment.	K.1															
		Licensee shall implement rad protection program/exposure guidelines; designated individual to authorize emergency workers dose > 10CFR20. Procedures for volunteers to carry out lifesaving/emergency activities. (demonstrate search & rescue)	K.2															
		a. Licensee shall have provision for 24 hr/ day capability to determine doses received by ERO. Able to distribute self-read and permanent record devices. b. Dosimeters should be read at appropriate frequencies and maintain records.	K.3															
		State and local organizations establish decision chain authorizing exposures in excess of EPA PAGs.	K.4															
		a. Organizations shall determine action levels for decontamination. b. And the means for Radiological decon of wounds, supplies, instruments/equipment and for waste disposal.	K.5															
		Licensee shall provide for onsite first aid capability.	L.2															
		Licensee shall provide for onsite first aid capability.	O.4.f															
		Licensee shall establish training programs for instructing/qualifying personnel who implement radiological Emerg Response plans and initial and retraining for first aid and rescue personnel.																

**Level of Use Information**

EPD Reference Number	NRC Insp. Index	Element / Description	NUREG 0654 Element	1993		1994		1995		1996		1997				1998			
				MP2	CY	MP1	CY	MP3	CY	MP2	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY
<b>Six Year Objectives</b>																			
13	e.	<b>Use of medical support personnel</b>  Medical emergency involving simulated contaminated individuals and local support services annually. Offsite portions may be performed as part of the required annual exercise.  ORG shall arrange local and backup hospital and medical services; able to evaluate rad exposure and uptake, insuring they are prepared to handle contaminated individuals.  ORG shall arrange for transport of rad accident victims to medical support facilities.  Licensee shall establish training programs for instructing/qualifying personnel who implement radiological Emerg Response plans and initial and retraining for medical support personnel.	N.2.c  L.1  L.4  O.4.h			5/14/94		10/4/95		4/4/96	5/15/96								
14	f.	<b>Use of licensee's headquarters support personnel **</b>  Licensee shall establish training programs for instructing/qualifying personnel who implement radiological Emerg Response plans and initial and retraining for Licensee's headquarters support personnel.	O.4.i				11/17/94		4/8/95				8/21/97						
15	g.	<b>Use of security personnel to provide prompt access for emergency equipment and support</b>  Licensee shall establish training programs for instructing/qualifying personnel who implement radiological Emerg Response plans and initial and retraining for police, security, and fire fighting personnel.	O.4.d			5/14/94		10/4/95											

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1993		1994		1995		1996		1997				1998	
				MP2	CY	MP1	CY	MP3	CY	MP2	CY	MP1	MP2	MP3	CY	MP3	MP1
<b>Six Year Objectives</b>																	
16	h.	<b>Use of backup communications</b>  Communications plans shall include titles and alternates for both ends of the COM links; shall establish primary and backup means of COM for licensee, local and state response organizations.	F.1									8/21/97			X		
17	i	<b>Rumor control</b>  Organization shall establish coordinated arrangements for dealing with rumors	G.4.c			5/14/94		10/5/95			8/14/96	8/21/97					X
18	j.	<b>Use or emergency power (where not part of plant systems, e.g. technical support center [EOF/TSC])</b>  During periods of activation, the TSC will operate uninterrupted to provide plant management and technical support to plant operations personnel. (EOFs/TSCs shall be divorced from normal power supplies and back-up power sources used)	8.2.1							11/21/96					X		
19	k.	<b>Evacuation of Emergency Response facilities (ERFs) and relocation to backup ERFs, where applicable **</b>  Not applicable to Millstone or Connecticut Yankee	J.10.g														

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1993		1994		1995		1996		1997				1998		
				MP2	CY	MP1	CY	MP3	CY	MP2	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2
<b>Six Year Objectives</b>																		
20	l.	<b>Ingestion pathway exercise **</b>  State and local organizations shall est. capability to implement protective measures based on PAGs and other criteria. This shall include EPA recommendations regarding exposure results from the plume, regarding contamination of human food and animal food and feed  State shall specify protective measures for ingestion pathway, including protecting public from consumption of contaminated food. this includes whether dairy animals will be placed on stored feed. The plan shall ID procedures for detecting contamination,	J.9  J.11									10/8/97						
21	m.	<b>Field monitoring, including soil, vegetation, and water sampling **</b>  ORG has capability and resources for field monitoring W/in plume EPZ.  ORG shall have equipment and expertise for rapid assessment of actual/potential rad hazards through gaseous/liquid release pathways; this includes activation, notification, RMT makeup, transportation, communication, monitoring equip. and estimated deployment time  Arrangements to locate and track plume using either or both Federal and State resources.  Onsite and offsite drills shall be conducted annually. Including collection/ analysis of water, vegetation, soil and air and communications and record keeping. Local organizations shall participate.	I.7  I.8  I.11  N.2.d									8/21/97						

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1993		1994		1995		1996		1997				1998		
				MP2	CY	MP1	CY	MP3	CY	MP2	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2
<b>Six Year Objectives</b>																		
22	n.	<p><b>Capability for determining the magnitude and impact of the particular components of a release</b></p> <p>Licensee establishes methods/techniques to determine a)source term of releases within plant systems, ex. relationship between containment RMS readings and radioactive material available for release. b)magnitude of released radioactive materials based on plant systems</p> <p>Licensee shall est. relationship between effluent monitor readings and onsite/ offsite exposures and contamination for various meteorological conditions.</p> <p>Licensee shall est. methodology to determine release rate/projected dose if instrumentation for assessment are off- scale/inoperable.</p> <p>ORG shall have equipment and expertise for rapid assessment of actual/potential rad hazards through gaseous/liquid release pathways; this includes activation, notification, RMT makeup, transportation, communication, monitoring equip. and estimated deployment time</p> <p>ORG shall have capability to detect/ measure concentrations in air in EPZ as low as <math>1 \times 10^{-7}</math> Ci/cc in the field. Interference from noble gas and background rad shall not decrease stated MDA.</p> <p>ORG shall est. means for relating various measured parameters(e.g., contamination levels water, and air activity levels) to dose rates for key isotopes (Table 3) and gross radioactivity measurements. Provisions made for estimating integrated dose from pro</p>			5/14/94	10/5/95							8/21/97					
			1.3															
			1.4															
			1.6															
			1.8															
			1.9															
			1.10															

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1993		1994		1995		1996		1997				1998			
				MP2	CY	MP1	CY	MP3	CY	MP2	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY
<b>Six Year Objectives</b>																			
23	o.	<b>Capability for post-accident coolant sampling and analysis</b>  Onsite capability/resources to provide initial and continuing assessment throughout the accident including PASS capability, radiation and effluent monitors, in-plant iodine instruments and containment rad monitors(NUREG-0578).	I.2					10/5/95				X	X	X			X	X	X
24	p.	<b>Use of potassium iodide</b>  Licensee shall make provisions for use of radioprotective drugs,(e.g., individual thyroid protection).	J.6.c									8/21/97					X	X	
25	q	<b>Assembly and accountability</b>  Licensee shall provide to account for all onsite individuals and ascertain names of missing individuals within 30 minutes and account for all onsite individuals continuously thereafter.	J.5			5/14/94		8/30/95 *											
26	r.	<b>Recovery and Reentry **</b>  ORG develops plans/procedures for R and R and describe means to relax protective measures(e.g., allow reentry into an evacuated area). process should include both existing and potential conditions.  Plan shall contain position/title, authority and responsibilities of those filling key positions in ORO. The ORG shall include personnel to develop, evaluate and direct recovery and reentry operations.(Table top acceptable)	M.1  M.2					4/24/95 *											
27	N/A	<b>Quick Dispatch of OSC Teams</b>									11/21/96	8/14/96							
28	N/A	<b>Control of Drill</b>																	

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1993		1994		1995		1996		1997				1998		
				MP2	CY	MP1	CY	MP3	CY	MP2	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2
<b>Six Year Objectives</b>																		
29	N/A	Critique  All training including exercises, shall provide for formal critiques.	50, App E, F.5															8/22/97

X - Planned in this year  
 \*\* - This objective is common

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1999			2000			2001			2002			2003			2004						
				MP2	MP3	MP1	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY	MP2	MP3	MP1	CY	MP1	MP2	MP3	CY	MP3	MP1
Core Objectives																									
1	a.	<b>Accident detection and assessment</b>		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
		Classification & Rad levels established in procedures	I.1																						
		Initial/continuing assessment using in-plant & Cont. Rad Monitors	I.2																						
2	b.	<b>Emergency classification</b>		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
		Class & EALs in Emergency Procedures/Plan shall identify values & equipment	D.1																						
		Initiating conditions in App. 1 and FSAR for facility.	D.2																						
3	c.	<b>Notification onsite/offsite ERO</b>		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
		Procedures for notify response Org. of class/EALs & verification	E.1																						
		Procedures for alerting, notifying & mobilizing response personnel	E.2																						
		Site & State establish content of IRF	E.3																						
		Ability to warn all personnel within owner controlled area	J.1																						

**Level of Use Information**



EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1999		2000		2001		2002		2003		2004	
				MP2	MP3	MP1	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY
Core Objectives															
4	d.	<b>Communications</b>		X	X	X	X	X	X	X	X	X	X	X	X
		24 hr/day notify capability w/State/local Organizations/Federal Organizations/RMTs. Alert response Org & NRC com link	F.1												
		Communications links for fixed and mobile medical support facilities exist	F.2												
		Procedures for alerting, notifying, and mobilizing ERO	E.2												
		Provide follow-up messages to offsite officials: classification, release & duration, met data, dose rates, PARs, prognosis for continuing or terminating release	E.4												
		Sample, monitor and analysis; geophysical, met, rad monitors, dosimetry, laboratories- fixed or mobile	H.6												
		At least one onsite and one offsite Com. system; each shall have a backup power source. Annual test of communications W/Federal ERO and systems between CR,TSC, EOF, State and Local ERO and RMTs.	8.1												
		TSC has reliable voice and data communications W/CR, EOF. Reliable voice W/OSC, NRC OPS and State and local OPS.	8.2												
		OSC reliable voice Com W/CR, TSC & EOF.	8.3												
		EOF has reliable voice and data Com W/TSC and CR; and voice Con W/OSC, NRC, State and local OPS.	8.4												

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1999				2000				2001				2002				2003				2004			
				MP2	MP3	MP1	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY	MP2	MP3	MP1	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY
Core Objectives																											
5	e.	<b>Radiological exposure control</b>		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
		Establish exposure guidelines (EPA-400) for: removal injured person, corrective actions, assessment actions, first aid, decon, ambulance and medical treatment services.	K.1																								
		Provide onsite rad protection program include exposure guidelines, ID position to authorize emergency worker above 10CFR20 limits. Procedures to allow exposures for life saving/emergency activities, shall include expeditious decision making and consideration	K.2																								
		24 hr capability to determine doses, maintain records and a supply of dosimeters; self-reading and permanent devices.	K.3																								
		Determine action levels to determine need for decontamination and supply the means to decon personnel, wounds, supplies, etc.	K.5																								
		Onsite contamination control for access area; drinking water/food; criteria established for return to areas.	K.6																								
		Provide for radiological monitoring of people evacuated from the site.	J.3																								
		Make available for ERO respirators, protective clothing and radioprotective drugs.	J.6																								

**Level of Use Information**

EPD Reference Number	NRC Insp. Index	Element / Description	NUREG 0654 Element	1999				2000				2001				2002				2003				2004			
				MP2	MP3	MP1	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY	MP2	MP3	MP1	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY
Core Objectives																											
6	f.	<b>Protective action recommendation</b>  Recommend PARs to State and local officials including EALs in accord W/App 1 and recommendations of tables 2.1/2.2. This includes-prompt notifications to offsite authorities within plume pathway.	J.7	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X			
7	g.	<b>Staff augmentation</b>  Plan identifies State, local, NRC and private organizations that are part of response ORG; each ORG shall provide 24 hr/day Emerg response and 24 hr/day manning of communications links.  Written agreements included in Plan.  Each principal ORG capable of 24 hr Ops including resources(tech, admin & material).  Need to specify Corp. Mgmt, admin and tech support who will augment plant staff; logistic support e.g., transportation, Com, temp quarters, special equip and supplies; tech support for planning/reentry/ recovery; Mgmt level interface with government authorities;  Need to specify contractor/private organizations that could supply tech assist to and augment the ERO.  Need to ID services of local agencies, e.g., police, ambulance, medical, hospital, and fire fighting org; licensee provides transport/treatment for injured contaminated. Agreements in the plan.	A.1  A.3 A.4  B.7  B.8  B.9	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1999		2000		2001		2002		2003		2004					
				MP2	MP3	MP1	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY	MP2	MP3	MP1	CY
Core Objectives																			
8	h.	<b>Shift staffing</b>		X	X	X	X	X	X	X	X	X	X	X					
		Licensee shall ID onsite ERO of plant staff for all shifts, responsibilities/duties.	B.1																
		Licensee shall designate emergency coordinator, on shift at all times W/authority and responsibility to initiate emergency actions, include PAR for offsite emergency measures.	B.2																
		Licensee shall ID succession for emergency coordinator and conditions for utility official to assume this function.	B.3																
		Licensee shall specify positions/tasks covering Table B-1 and able to augment on-shift shortly after a declared emergency.	TABLE 2																
		Minimum staffing requirements for NRC licensee for nuclear power plant emergencies. Including functional areas, major tasks, position title or expertise and whether or not on shift or 30 or 60 minute response.																	

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1999			2000			2001			2002			2003			2004		
				MP2	MP3	MP1 CY	MP1	MP2	MP3 CY	MP3	MP1	MP2 CY	MP2	MP3	MP1 CY	MP1	MP2	MP3 CY	MP3	MP1	MP2 CY
Six Year Objectives																					
9	a.	<b>Off-hours staffing/Un-announced (6pm to 4am)</b>  All major elements of the plan and ORG are tested within the six (5) year period. One exercise should start between 6pm and mid-night and another between mid-night and 6 am every six years. Exercises should be conducted under various weather conditions and some	N.1.b				X *		X*												
10	b.	<b>Activation of emergency news center (Joint Information Center)</b>  Media centers designated for an emergency; includes space for limited number of news people at near site EOF.  Licensee shall have designated spokespersons, providing timely exchange of information; and must deal with rumors.	G.3  G.4						X	X				X	X				X		
11	c.	<b>Use of fire control teams</b>  Conduct fire drills in accordance with T.S.(ok to monitor with NRC resident)  Implement training programs; initial and retraining for police, security and fire fighting personnel.	N.2.b  O.4.d														X	X			

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1999			2000			2001			2002			2003			2004		
				MP2	MP3	MP1 CY	MP1	MP2	MP3 CY	MP3	MP1	MP2 CY	MP2	MP3	MP1 CY	MP1	MP2	MP3 CY	MP3	MP1	MP2 CY
Six Year Objectives																					
12	d.	Use of first aid and/or rescue teams					X	X													
		Licensee shall est. exposure guidelines (EPA) for; removal of injured persons; corrective actions; assessment actions; first aid; personnel decontamination; ambulance service; and medical treatment.	K.1																		
		Licensee shall implement rad protection program/exposure guidelines; designated individual to authorize emergency workers dose > 10CFR20. Procedures for volunteers to carry out lifesaving/emergency activities.(demonstrate search & rescue)	K.2																		
		a. Licensee shall have provision for 24 hr/ day capability to determine doses received by ERO. Able to distribute self-read and permanent record devices. b. Dosimeters should be read at appropriate frequencies and maintain records.	K.3																		
		State and local organizations establish decision chain authorizing exposures in excess of EPA PAGs.	K.4																		
		a. Organizations shall determine action levels for decontamination. b. And the means for Radiological decon of wounds, supplies, instruments/equipment and for waste disposal.	K.5																		
		Licensee shall provide for onsite first aid capability.	L.2																		
		Licensee shall provide for onsite first aid capability.	O.4.f																		
		Licensee shall establish training programs for instructing/qualifying personnel who implement radiological Emerg Response plans and initial and retraining for first aid and rescue personnel.																			

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1999			2000			2001			2002			2003			2004		
				MP2	MP3	MP1 CY	MP1	MP2	MP3 CY	MP3	MP1	MP2 CY	MP2	MP3	MP1 CY	MP1	MP2	MP3 CY	MP3	MP1	MP2 CY
Six Year Objectives																					
13	e.	<b>Use of medical support personnel</b>  Medical emergency involving simulated contaminated individuals and local support services annually. Offsite portions may be performed as part of the required annual exercise.  ORG shall arrange local and backup hospital and medical services; able to evaluate rad exposure and uptake, insuring they are prepared to handle contaminated individuals.  ORG shall arrange for transport of rad accident victims to medical support facilities.  Licensee shall establish training programs for instructing/qualifying personnel who implement radiological Emerg Response plans and initial and retraining for medical support personnel.	N.2.c  L.1  L.4  O.4.h				X	X			X	X									
14	f.	<b>Use of licensee's headquarters support personnel **</b>  Licensee shall establish training programs for instructing/qualifying personnel who implement radiological Emerg Response plans and initial and retraining for Licensee's headquarters support personnel.	O.4.i				X			X											
15	g.	<b>Use of security personnel to provide prompt access for emergency equipment and support</b>  Licensee shall establish training programs for instructing/qualifying personnel who implement radiological Emerg Response plans and initial and retraining for police, security, and fire fighting personnel.	O.4.d				X	X													

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1999				2000				2001				2002				2003				2004			
				MP2	MP3	MP1	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY	MP2	MP3	MP1	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY
Six Year Objectives																											
16	h.	<b>Use of backup communications</b>  Communications plans shall include titles and alternates for both ends of the COM links; shall establish primary and backup means of COM for licensee, local and state response organizations.	F.1															X			X						
17	i.	<b>Rumor control</b>  Organization shall establish coordinated arrangements for dealing with rumors	G.4.c				X		X					X			X								X		
18	j.	<b>Use or emergency power (where not part of plant systems, e.g. technical support center [EOF/TSC])</b>  During periods of activation, the TSC will operate uninterrupted to provide plant management and technical support to plant operations personnel.(EOFs/TSCs shall be divorced from normal power supplies and back-up power sources used)	8.2.1											X							X						
19	k.	<b>Evacuation of Emergency Response facilities (ERFs) and relocation to backup ERFs, where applicable **</b>  Organizations plans to implement protective measures for the plume exposure pathway shall include means of relocation.(requires use of Alternate Location and consideration of relocating EOF personnel)	J.10.g															X									

**Level of Use Information**



EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1999			2000			2001			2002			2003			2004						
				MP2	MP3	MP1	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY	MP2	MP3	MP1	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2
Six Year Objectives																									
20	l.	<b>Ingestion pathway exercise **</b>  State and local organizations shall est. capability to implement protective measures based on PAGs and other criteria. This shall include EPA recommendations regarding exposure results from the plume, regarding contamination of human food and animal food and feed  State shall specify protective measures for ingestion pathway, including protecting public from consumption of contaminated food. this includes whether dairy animals will be placed on stored feed. The plan shall ID procedures for detecting contamination,	J.9  J.11													X									
21	m.	<b>Field monitoring, including soil, vegetation, and water sampling **</b>  ORG has capability and resources for field monitoring W/in plume EPZ.  ORG shall have equipment and expertise for rapid assessment of actual/potential rad hazards through gaseous/liquid release pathways; this includes activation, notification, RMT makeup, transportation, communication, monitoring equip. and estimated deployment time  Arrangements to locate and track plume using either or both Federal and State resources.  Onsite and offsite drills shall be conducted annually. Including collection/ analysis of water, vegetation, soil and air and communications and record keeping. Local organizations shall participate.	I.7  I.8  I.11  N.2.d												X										

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1999		2000		2001		2002		2003		2004					
				MP2	MP3	MP1	CY	MP1	MP2	MP3	CY	MP3	MP1	MP2	CY	MP1	MP2	MP3	CY
Six Year Objectives																			
22	n.	<p><b>Capability for determining the magnitude and impact of the particular components of a release</b></p> <p>Licensee establishes methods/techniques to determine a)source term of releases within plant systems, ex. relationship between containment RMS readings and radioactive materials available for release. b)magnitude of released radioactive materials based on plant systems I.3</p> <p>Licensee shall est. relationship between effluent monitor readings and onsite/ offsite exposures and contamination for various meteorological conditions. I.4</p> <p>Licensee shall est. methodology to determine release rate/projected dose if instrumentation for assessment are off-scale/inoperable. I.8</p> <p>ORG shall have equipment and expertise for rapid assessment of actual/potential rad hazards through gaseous/liquid release pathways; this includes activation, notification, RMT makeup, transportation, communication, monitoring equip. and estimated deployment time I.9</p> <p>ORG shall have capability to detect/measure concentrations in air in EPZ as low as <math>1 \times 10^{-7}</math> Ci/cc in the field. Interference from noble gas and background rad shall not decrease stated MDA. I.10</p> <p>ORG shall est. means for relating various measured parameters(e.g., contamination levels water, and air activity levels) to dose rates for key isotopes (Table 3) and gross radioactivity measurements. Provisions made for estimating integrated dose from pro</p>				X	X												

**Level of Use Information**

EPD Reference Number	NRC Insp. 82302 Index	Element / Description	NUREG 0654 Element	1999			2000			2001			2002			2003			2004			
				MP2	MP3	MP1	MP1	MP2	MP3	MP3	MP1	MP2	MP2	MP3	MP1	MP1	MP2	MP3	MP3	MP1	MP2	MP2
Six Year Objectives																						
23	o.	<b>Capability for post-accident coolant sampling and analysis</b>  Onsite capability/resources to provide initial and continuing assessment throughout the accident including PASS capability, radiation and effluent monitors, in-plant iodine instruments and containment rad monitors(NUREG-0578).	I.2	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
24	p.	<b>Use of potassium iodide</b>  Licensee shall make provisions for use of radioprotective drugs,(e.g., individual thyroid protection).	J.6.c															X	X			
25	q	<b>Assembly and accountability</b>  Licensee shall provide to account for all onsite individuals and ascertain names of missing individuals within 30 minutes and account for all onsite individuals continuously thereafter.	J.5						X	X*												
26	r.	<b>Recovery and Reentry **</b>  ORG develops plans/procedures for R and R and describe means to relax protective measures(e.g., allow reentry into an evacuated area). process should include both existing and potential conditions.  Plan shall contain position/title, authority and responsibilities of those filling key positions in ORO. The ORG shall include personnel to develop, evaluate and direct recovery and reentry operations.(Table top acceptable)	M.1  M.2							X*								X				
27	N/A	<b>Quick Dispatch of OSC Teams</b>											X		X							
28		<b>Control of Drill</b>																				

**Level of Use Information**

EPD Reference Number	NRC Insp. Index	Element / Description	NUREG 0654 Element	1999			2000			2001			2002			2003			2004		
				MP2	MP3	MP1 CY	MP1	MP2	MP3 CY	MP3	MP1	MP2 CY	MP2	MP3	MP1 CY	MP1	MP2	MP3 CY	MP3	MP1	MP2 CY
Six Year Objectives																					
29		Critique All training including exercises, shall provide for formal critiques.	50, App E, F.5																		

**Level of Use Information**

## Attachment 8 General Instructions and Rules For Players

All players should read and follow the rules given below. This is important to the successful demonstration of emergency response capabilities.

1. Remember there are two clocks—the scenario time and the actual clock time. The scenario time is more important to you.
2. Know the overall organization. The controllers are visually identifiable because of the “red hat”. Some controllers may also be evaluators.
3. NRC/FEMA (federal agencies) evaluators may also be present. Identify them by their identification badges or hats. They are here to evaluate players’ performance and approve the emergency exercise.
4. Visitors may be present. Identify them by their “green hats”.
5. Identify yourself by name and function to the exercise controllers and the NRC/FEMA evaluators.
6. Play out all actions, as much as possible, in accordance with the emergency plan and procedures as if it were a real emergency. You should perform all actions as in a real emergency unless you are told to simulate them. If authorized to simulate an action, tell the controller how and when you would actually do it.

Identify your actions to the controller. State whether you are going to play them out or simulate them. For your own benefit, it is recommended that you play out your actions as much as possible. It is to your advantage to exercise as many of your actions as possible. Do not take any action that endangers yourself, other participants, private property or operation of the units.

7. Periodically speak out loud, identifying your key actions and decisions to the controller and federal evaluators. This may seem artificial, but it will assist in the evaluation process and is to your benefit.
8. If you are in doubt, ask your controller for clarification. The controller will not prompt or coach you. Do not dwell on the highly improbable nature of some of the scenario events. Each situation should be taken at face value and responded to appropriately.
9. The controller periodically will issue messages or instructions designed to initiate response actions. You should accept these messages immediately. They are essential to your successful performance.
10. If the controller intervenes with your play, it is for a good reason. Obey your controller’s directions at all times. This is essential to the overall success of the exercise.
11. If you disagree with your controller, you may ask him to reconsider or consult with the lead exercise coordinator as time permits. You must, however, accept his word as final and proceed.
12. Respond to the controller’s questions.
13. You must not accept any messages/instructions from the federal evaluators. If they want to initiate actions or test your abilities, they must work through your controller.
14. You must play as if radiation levels actually are present, in accordance with the information you have received. This will require that you wear radiation dosimeters and anti-contamination clothing, observe good radiation protection practices, and be aware of and minimize your radiation exposure. Identify the individuals in your emergency response organization who are responsible for informing you of these items. Follow their instructions.

15. The controllers and evaluators are exempt from acting as if simulated radiation levels from the emergency exercise are present. Do not let them confuse you or cause you to act unwisely.
16. If you are entering normal Millstone station radiation areas, observe all rules and procedures. No one (even the controller and federal evaluators) is exempt from normal station radiological practices and procedures.
17. Demonstrate knowledge of your emergency plan, emergency operations, and procedures.
18. Use status boards, log books, interoffice memos, etc., as much as possible to document and record your actions, instructions, and reports to your co-players. Communications during emergencies are critical to success, ensure information is understood when performing as the provider and receiver. Use best communication techniques including 2/3 Way, repeat backs and phonetic alphabet.
19. Do not enter into conversations with the visitors.
20. You may answer questions directed to you by evaluators. If the question is misdirected to you or you do not know the answer, refer them to your lead player or the controller.
21. Keep a list of items you feel will improve your plans and procedures. Provide this to your lead player. Lead players will ensure these are considered. If necessary, they will identify them to the controller. Remember one of the main purposes of the exercise is for you, the player, to assure yourself that you are prepared adequately. Areas for improvement or lessons learned, when identified, will improve your overall emergency preparedness.
22. A critique of the exercise will occur after the exercise is terminated. Provide your input to your lead player or the controller if you are not to be present. This will help in the overall evaluation the controller will present during the exercise critique preparation.

#### Player Safety Responsibilities

1. Follow safe procedures and take an active part in the work of protecting your fellow workers and the plant.
2. Cooperation is necessary to protect yourself and others.
3. Follow safety rules, take no unnecessary chances, use all safety equipment provided, and make safety a part of your responsibility.
4. In case of accidents or injury, report promptly to the lead controller and get first aid or medical help in accordance with station procedures.
5. Please report any hazardous condition to the lead controller.
6. Cooperate in every respect with the plant safety program so the operations may be carried on in a way that ensures safety.
7. Know your exact duties in case of fire or an actual emergency.
8. Safety takes precedence over all other requirements.