

Nuclear Management Company, LLC
Prairie Island Nuclear Generating Plant
1717 Wakonade Dr. East • Welch MN 55089

February 4, 2002

US Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

Docket Nos. 50-282 License Nos. DPR-42 Docket Nos. 50-306 License Nos. DPR-60

> Prairie Island Emergency Plan Implementing Procedures - F3

Emergency Response Plan Implementing Procedures

Furnished with this letter are the Prairie Island Nuclear Generating Plant Emergency Plan Implementing Procedures F3. This revision includes the following procedures:

INDEXES: Emergency Plan Implementing Procedures TOC

REVISIONS

F3-3	Responsibilities During a Notification of Unusual Event	Rev 17
F3-21	Establishment of a Secondary Access Control Point	Rev 10
F3-31	Response to Security Related Threats	Rev 5

DELETIONS

INSTRUCTIONS:

Please post changes in your copy of the Prairie Island Nuclear Generating Plant Emergency Plan Implementing Procedures. Procedures, which have been superseded or deleted, should be destroyed. Please sign and return the acknowledgment of this update to Bruce Loesch, Prairie Island Nuclear Generating Plant, 1717 Wakonade Drive East, Welch, MN 55089.

If you have any questions, please contact Mel Agen at 651-388-1121 Extension 4240.

A045

Mano K. Nazar Site Vice President Prairie Island Nuclear Generating Plant

c: USNRC - Steve Orth, Region III (2 copies)

NRC Resident Inspector (w/o attachment)

J Silberg (w/o attachment)

M Agen (w/o attachment)

Records Management (Doc Control Copy) (w/o attachment)

NL File (w/o attachment)

Mfst Num: 2002 - 0079 FROM : Bruce Loesch/Mary G TO : UNDERWOOD, BETTY J Copy Num: 515 SUBJECT : Revisions to CONTRO ************************************	DITED DO	Holder : US NRC DOC CONTROL DESK	
Procedure #	Rev		
Revisions: ======== F3-21 F3-3	17	ESTABLISHMENT OF A SECONDARY ACCESS CONTRO RESPONSIBILITIES DURING A NOTIFICATION OF EVENT	
F3-31	5	RESPONSE TO SECURITY RELATED THREATS	
UPDATING INSTRUCTIONS			
Place this material in your Prairie Island Controlled Manual or File. Remove revised or cancelled material and recycle it. Sign and date this letter in the space provided below within ten working days and return to Bruce Loesch or Mary Gadient, Prairie Island Nuclear Plant, 1717 Wakonade Drive E., Welch, MN 55089. Contact Bruce Loesch (ext 4664) or Mary Gadient (ext 4478) if you have any questions.			
Received the material stated	above a	and complied with the updating instructions	
		Date	

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

Title:

Emergency Plan Implementing Procedures TOC

Effective Date : 01/29/02

Approved By: Tou Ce

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RESPONSIBILITIES DURING A NOTIFICATION OF UNUSUAL EVENT

NUMBER:

F3-3

REV:

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RÉFERENCE USE »

- Procedure segments may be performed from memory.
- Use the procedure to verify segments are complete.
- Mark off steps within segment before continuing.
- Procedure should be available at the work location.

 O.C. REVIEW DATE:
 OWNER:
 EFFECTIVE DATE

 11-78-015C
 M. Werner
 1-29-02

RESPONSIBILITIES DURING A NOTIFICATION OF UNUSUAL EVENT

NUMBER:

F3-3

REV:

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1.0 PURPOSE

The purpose of this instruction is to delineate the responsibilities of various emergency organization personnel and onsite organizations required to respond to a Notification of Unusual Event.

2.0 APPLICABILITY

This instruction **SHALL** apply to all plant personnel.

3.0 PRECAUTIONS

- 3.1 All personnel should stay clear of any areas as announced over the public address system.
- 3.2 All personnel should refrain from using the public address system or telephone system during any emergency situation.

4.0 RESPONSIBILITIES

- 4.1 Overall Responsibility Shift Manager
- 4.2 Assistance, Control Room Shift Supervisors

Control Room Operators

TSC - Shift Emergency Communicator Plant - Shift Radiation Protection Specialist

RESPONSIBILITIES DURING A NOTIFICATION OF UNUSUAL EVENT

NUMBER:
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5.0 DISCUSSION

5.1 Notification of Unusual Event

5.1.1 Definition

Unusual Events are events that are in progress or have occurred which indicate a potential degradation of the level of safety of the plant.

No release of radioactive material requiring offsite response or monitoring is expected unless further degradation of safety systems occurs.

5.1.2 Purpose of the Notification of Unusual Event Class

The purpose of the Notification of Unusual Event Emergency classification is to:

- A. Have the operating staff come to a state of readiness from the standpoint of emergency response in the event the handling of the initial condition needs to be escalated to a more severe action level class;
- B. Provide for systematic handling of Unusual Event information.

5.1.3 Plant Actions & Responsibilities:

- A. Promptly inform State and/or local offsite authorities of nature of unusual condition as soon as discovered.
- B. Assess and respond to Unusual Event.
- C. Augment on-shift resources (if needed). This may involve full activation of the Emergence Response Organization depending on plant management discretion.
- D. Activate the Technical Support Center, if needed. Working in the TSC may enhance the plant technical support assessment and response.
- E. Close out with verbal summary to offsite authorities.

OR

- F. Escalate to a more severe class.
- **5.1.4** State and/or local offsite authority actions:
 - A. Provide fire or security assistance if required.
 - B. Standby until verbal closeout.

<u>OR</u>

C. Escalate to a more severe class.

RESPONSIBILITIES DURING A NOTIFICATION OF UNUSUAL EVENT

NUMBER:

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6.0 PREREQUISITES

An Unusual Event has been or will be declared.

7.0 PROCEDURE

7.1 Shift Supervisors

- 7.1.1 Shift Supervisor of <u>affected</u> unit:
 - A. Proceed to the Control Room (if not already there).

NOTE: The affected unit Shift Supervisor SHALL remain in the Control Room at all times during accident conditions until properly relieved.

B. If needed, ensure that applicable Emergency Operating Procedures (EOPs) are implemented to respond to the Notification of Unusual Event conditions with the objective of returning the plant to a normal, safe condition (or cold shutdown, if determined to be necessary).

NOTE:	The Shift Manager and SEC will be summoned to the Control Room per the EOPs.

- C. Direct activities of the Control Room Operators.
- 7.1.2 Shift Supervisor of <u>unaffected</u> unit:
 - A. Proceed to the Control Room (if not already there).
 - B. Direct operations on the <u>unaffected</u> unit.
 - C. Assist the Shift Manager, as necessary.

E3

RESPONSIBILITIES DURING A NOTIFICATION OF UNUSUAL EVENT

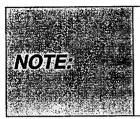
NUMBER:

F3-3

REV:

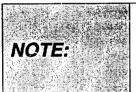
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7.2 Shift Manager



The initial E-Plan response to the event should be made by the Shift Manager. However, in order to adequately maintain oversight of the operational aspects of the event, it may be necessary for the Shift Manager to delegate specific E-Plan duties to the unaffected unit SS during the initial response while still maintaining overall authority and control.

- **7.2.1** Report to the Control Room immediately upon notification.
- **7.2.2** Assess the emergency condition, event evaluation, and safety related aspects of the plant.



It is recommended that the Shift Manager stands at the Reactor Operator's desk to hear key communications, use an ERCS terminal for monitoring Critical Safety Function Status Trees (CSFSTs), and solicit or answer questions of the SS.

7.2.3 Use PINGP 1125, "Shift Manager/Shift Supervisor Emergency Director Checklist," for specific guidance on emergency plan NUE duties ("Example Only" copy of PINGP 1125 is attached to F3-4).

7.3 Control Room Personnel

- **7.3.1** Assist the Shift Supervisor as requested.
- 7.3.2 Utilize applicable Operations Manual procedures to respond to the Notification of Unusual Event emergency classification, as appropriate, with the object of returning the plant to a normal safe status (or cold shutdown, if determined to be necessary).
- 7.3.3 Announce the location and nature of the emergency over the public address system, if applicable. Direct all non-essential personnel to remain clear of the affected area (if applicable) and to refrain from using the public address system.
- 7.3.4 Continuously monitor the Control Room instrumentation, radiation monitors, or any other developments which would be indicative of further system degradation. Inform the Shift Supervisor immediately of any changes in the plant status.

RESPONSIBILITIES DURING A NOTIFICATION OF UNUSUAL EVENT

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7.4 Emergency Director

- 7.4.1 The Emergency Director position is not normally activated during the Notification of Unusual Event.
- 7.4.2 IF the Shift Manager decides to activate the Emergency Response Organization, THEN the ED position should be initially staffed by the Shift Manager and eventually turned over to an oncoming Emergency Director designee.
- 7.4.3 IF the TSC is activated, <u>THEN</u> an Emergency Director should be designated as the person in command and control in the TSC.
- 7.4.4 Those TSC functions and activities necessary for the specific event response need be implemented. Facility checklists may be used as guides. Examples of TSC functions are shown below:
 - A. Plant Status Board Keeper
 - B. ERCS Operation
 - C. ED Log Keeper
 - D. Emergency Work Status Board
 - E. Emergency Communicators

7.5 Shift Emergency Communicator (SEC)

- 7.5.1 Report to the Control Room immediately upon notification.
- 7.5.2 Complete the "Emergency Notification Report Form," (PINGP 577), F3-5 and have it reviewed and approved by the Shift Manager.

NOTE:

State and local authorities SHALL be notified within 15 minutes of the decisions of the emergency classification.

7.5.3 Complete the required notification of state and local authorities, and site personnel in accordance with PINGP 579 of F3-5, "Emergency Notifications."

RESPONSIBILITIES DURING A NOTIFICATION OF UNUSUAL EVENT

NUMBER:
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- 7.5.4 Assist as necessary the Shift Manager in the coordination of other required communication contacts (e.g., medical support, fire support, etc.). See the "Mo & PI Emergency Preparedness Telephone Directory" for local support services phone numbers.
- **7.5.5** Notify appropriate plant staff support personnel to augment the onsite staff or activate the ERO as deemed necessary by the Shift Manager.
- **7.5.6** Maintain communications throughout the emergency classification as required by F3-5, "Emergency Notifications."

NOTE:

Be prepared to notify applicable authorities if conditions escalate to a more severe emergency class.

7.5.7 When the Notification of Unusual Event class has been terminated, close-out the emergency classification, by notifying the state, local, and site personnel in accordance with F3-5, "Emergency Notifications."

7.6 Other Operations Personnel

- **7.6.1** Assistant Plant Equipment Operators and Plant Attendants should continue with assigned duties or report to the Control Room if requested.
- **7.6.2** Relief Shift Operators onsite, should continue with assigned operations unless their assistance is requested.

7.7 Radiation Protection Group

- **7.7.1** The Shift Radiation Protection Specialist **SHALL** provide assistance (e.g., sampling, chemistry, radio-chemistry, surveys, etc.) as requested by the Shift Supervisor.
- 7.7.2 An REC designee should report to the TSC and provide event updates to the Wisconsin Health Dept. representative using PINGP 1246, WI/MN Health Department Initial Call Back Information.
- 7.7.3 Other Radiation Protection Group personnel should continue with normal duties unless directed to do otherwise.

RESPONSIBILITIES DURING A NOTIFICATION OF UNUSUAL EVENT

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7.8 Plant Security Force

- 7.8.1 The designated Security Officer or Security Staff member SHALL perform the responsibilities of the Shift Emergency Communicator (SEC).
- **7.8.2** All other plant security force should continue with normal duties unless directed to do otherwise.
- 7.8.3 During off-normal work hours and when requested by the Shift Emergency Communicator (SEC), a designated member of the Security Force should control the telephone switchboard in the TSC.

7.9 All Other Personnel On Site

- **7.9.1** Continue with normal duties unless directed to do otherwise.
- 7.9.2 Stay clear of areas as announced over the public address system.

7.10 Business Support Group

During normal work hours and when requested by the SEC, a designated person from the plant switchboard operator group should report to the TSC to control the telephone switchboard.

ESTABLISHMENT OF A SECONDARY ACCESS CONTROL POINT

NUMBER:

F3-21

REV:

10

PREFERENCE USE

- Procedure segments may be performed from memory.
- Use the procedure to verify segments are complete.
- Mark off steps within segment before continuing.
- Procedure should be available at the work location.

O.C. REVIEW DATE:	OWNER:	EFFECTIVE DATE
12-26-01	M. Werner	1-29-02

ESTABLISHMENT OF A SECONDARY ACCESS CONTROL POINT

NUMBER:

F3-21

REV:

10

1.0 PURPOSE

This instruction provides guidelines to establish a Secondary Access Control Point, ensuring that all personnel are properly badged with TLDs and dosimeters when the normal Access Control Point has been evacuated.

2.0 APPLICABILITY

This instruction SHALL apply to all plant personnel.

3.0 PRECAUTIONS

- 3.1 All exposure **SHALL** be recorded properly in the individual's record.
- 3.2 All exposure SHALL be controlled in accordance with F3-12.
- 3.3 Some security measures may be suspended in an emergency when this action is immediately needed to protect the Public Health and Safety. The measures that could be suspended include:
 - 3.3.1 Access Control for selected vital areas.
 - 3.3.2 The searching and identification of responding personnel, their vehicles and hand carried items.
 - **3.3.3** The use of badges and registration of responding personnel.

Refer to SIP 5.2, Security Response to Site Emergencies, for specific guidance.

3.4 Keys for vital areas are placed on plant operator keyrings to provide a means of entering areas in emergencies if security system is malfunctioning or suspended.

ESTABLISHMENT OF A SECONDARY ACCESS CONTROL POINT

NUMBER: F-3-21

REV: 10

4.0 RESPONSIBILITIES

4.1 Radiation Protection Group

- 4.1.1 The Radiation Protection Group (RPG) has the responsibility to monitor for abnormal radiation levels, contamination levels, and/or high airborne problems throughout the plant site. Report all abnormalities to the Radiological Emergency Coordinator (REC).
- **4.1.2** The RPG has the responsibility for Radiation Exposure Control at Secondary Access Control.
- 4.2 The REC has the responsibility to assess/evaluate survey information and recommend to the Emergency Director (ED) when establishment of a Secondary Access Control Point is necessary.
- 4.3 The ED has the responsibility to direct the establishment of a Secondary Access Control Point when recommended by the REC.
- 4.4 The Security Force has the responsibility to assist in establishing and maintaining the Secondary Access Control Point.

5.0 DISCUSSION

- 5.1 A Secondary Access Control Point (established in the Guardhouse or at a designated area further from the plant) may become necessary due to:
 - **5.1.1** High radiation levels, high contamination levels, and/or high radioactive airborne levels at the normal Access Control; or,
 - **5.1.2** Abnormal radiation levels, contamination levels, and/or high airborne problems throughout the plant site in non-controlled areas.
 - **5.1.3** Toxic gas release throughout the plant site.

ESTABLISHMENT OF A SECONDARY ACCESS CONTROL POINT

NUMBER:

₹3-21

REV:

10

6.0 PREREQUISITES

Prairie Island Nuclear Generating Plant has declared an Emergency classification and the establishment of a Secondary Access Control Point has been recommended.

7.0 PROCEDURE

- **7.1 Monitor** the radiation, contamination, and airborne levels throughout the plant on a routine basis.
- 7.2 Report and/or route survey results to the REC for review.
- 7.3 WHEN directed by the ED, on the REC's recommendation, <u>THEN</u> establish the secondary Access Control Point at the designated location.
- **7.4** Ensure adequate forms and equipment are available at Secondary Access Control Point.
 - 7.4.1 <u>IF time AND</u> radiation conditions allow, <u>THEN</u> transfer equipment and supplies from the normal Access Control Point to the designated Secondary Access Control Point.
 - 7.4.2 <u>IF</u> access equipment and supplies <u>NOT</u> accessible, <u>THEN</u> **transfer** the Secondary Access Control Point supplies from the EOF Count Room (Attachment A), to the designated Secondary Access Control Point.
- 7.5 Maintain exposure control at the Secondary Access Control Point on a continuous basis.
- 7.6 Request assistance from the Security Force in establishing and maintaining the Secondary Access Control Point. Security Force personnel should take "plant staff" security badges with them to the designated Secondary Access Control Point.
- 7.7 Issue TLD's and dosimetry in accordance with F3-12, Emergency Exposure Control, and the Radiation Protection Manual.
- 7.8 Maintain Secondary Access Control Point until otherwise directed by the REC and/or the ED.

ESTABLISHMENT OF A SECONDARY ACCESS CONTROL POINT

NUMBER:

F3-21

REV:

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Attachment A Secondary Access Control Kit Inventory Summary

NOTE:

Actual Inventory Controlled by SP 1034, Emergency Plan Rad Instrument Test.

- 1. 100 TLD 's
- 2. 100 0-5R Dosimeters
- 3. 50 0-1R Dosimeters
- 4. 100 0-200mr Dosimeters
- 5. Dosimeter charger/spare battery
- 6. 100 Copies of PINGP 1041, EOF Entry Log
- 7. 100 Copies of PINGP 1001, NRC Form 4 & 5 Occupational External Radiation Exposure
- 8. Pens
- 9. 100 Copies of PINGP 346, Radiation Work Permits
- 10. 100 Copies of RP-133, Access Control Cards
- 11. Laundry marker(s)
- 12. Marking pen (fine point)
- 13. 100 Copies of PINGP 738, Dose Monitor Worksheet (Time Keeping)
- 14. 100 Copies of PINGP 755, Emergency Weekly Exposure Record
- 15. One copy of F3-12, Emergency Exposure Control
- 16. 100 Copies of PINGP 390, Daily Exposure
- 17. 2 red markers
- 18. "Available Exposure" stamp and ink pad
- 19. 100 Copies of PINGP 1208, Cumulative Occupational Exposure History

RESPONSE TO SECURITY RELATED THREATS

NUMBER:

F3-31

REV: 5

REFERENCE USE

- Procedure segments may be performed from memory.
- Use the procedure to verify segments are complete.
- Mark off steps within segment before continuing.
- Procedure should be available at the work location.

O.C. REVIEW DATE:	OWNER:	EFFECTIVE DATE
1-22-03	M. Werner	1-29-02

RESPONSE TO SECURITY RELATED THREATS

NUMBER:

F3-31

REV:

5

1.0 PURPOSE

This procedure provides guidance for responding to a credible security threat by the plant staff resulting in a declared emergency.

2.0 APPLICABILITY

This procedure **SHALL** apply to the duty Shift Manager, Shift Supervisor, Plant Manager, Emergency Director and plant personnel during a credible security threat. Specific Security Force actions and responses are described in the Safeguards Contingency Plan and procedures.

3.0 PRECAUTIONS

If a bomb or sabotage device is found,

- **3.1** Personnel should remain at a distance of 300 to 500 feet, if possible, from the device.
- 3.2 The person discovering the device SHALL NOT touch or disturb it.
- 3.3 Hand-held radios should not be operated within a distance of 50 feet from the explosive device.

RESPONSE TO SECURITY RELATED THREATS

NUMBER: F3-31

4.0 RESPONSIBILITIES

- 4.1 The Plant Manager or designee has responsibility to assist the Shift Manager during a plant security event.
- 4.2 The Operations Shift Manager has responsibility for safe operation of the plant and initiation of the Emergency Plan during a plant security event.
- 4.3 Operations Shift Supervisor has responsibility for plant operations and assessment of operational aspects of the emergency.
- 4.4 Superintendent Security/designee has responsibility to implement the Safeguards Contingency Plan during a security event and support the Operations Shift Manager as necessary.
- 4.5 Shift Chemist has responsibility to assist Shift Manager in performing notification during security threats.

5.0 GENERAL INFORMATION

5.1 Definitions

- 5.1.1 HIGH Credible Threat Information assessed as constituting a believable threat against safe or secure operation of the plant expected to become a security event within 24 hours and to cause loss of Engineered Safety Function (ESF) and there is a low probability of interdiction prior to threat impacting the plant.
- **5.1.2** LOW Credible Threat Information assessed as constituting a believable threat against safe or secure operation of the plant.
- **5.1.3** Non-Credible Threat Information assessed as offering no reasonable basis to quality as credible.
- 5.1.4 Security Threat Any notification from any source which is received at the site or the corporate office which could be considered as a threat to the safety of the site whether considered credible or not.

RESPONSE TO SECURITY RELATED THREATS

NUMBER: **₹3-31**REV: 5

5.2 Discussion

Once a security threat (i.e., bomb threat, adversary threat, etc.) is determined to be a HIGH credible security threat, the definition of an ALERT is met and an ALERT should be declared per F3-2.

Once a security threat (i.e., bomb threat, adversary threat, etc.) is determined to be a LOW credible security threat, the definition of a NUE is met and a NUE should be declared per F3-2.

The duty operations Shift Manager remains in charge of the overall plant response to the security threat with assistance from Plant Security, Operations, Local Law Enforcement Agencies (LLEA) and Nuclear Management Company (NMC) staff.

If changing security or plant conditions warrant escalation to a higher emergency classification, the Shift Manager is responsible to authorize the escalation.

Implementation of Emergency Pian procedures during a security event may need to be modified, depending on the event, in order to protect the safety of plant personnel, vital equipment, or protect the health and safety of the public.

6.0 PREREQUISITES

- **6.1** A credible security threat exists and;
- 6.2 A Notification of Unusual Event (NUE) or Alert has been declared.

RESPONSE TO SECURITY RELATED THREATS

NUMBER:
F3-31
REV: 5

7.0 PROCEDURE

- 7.1 The Plant Manager or designee should go to the Control Room to assist with communications.
- 7.2 The Duty Shift Manager/Shift Supervisor should **ensure** the following activities are performed or considered:
 - 7.2.1 <u>IF</u> a bomb device exists, <u>THEN</u> **ensure** the following message is broadcasted over the plant P/A system:

NOTE: During drills, the announcement should begin and end with "THIS IS A DRILL".	
"ATTENTION ALL PLANT PERSONNEL. ATTENTION PERSONNEL.	N ALL PLANT
"A BOMB MAY EXIST IN THE(specify area)	AREA."
"STAY CLEAR OF" (specify area)	

Repeat message after about ten (10) second interval.

RESPONSE TO SECURITY RELATED THREATS

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7.2.2 IF an Alert has been declared, THEN:

The **Alert** classification was declared based on a HIGH credible security threat. Site personnel are to be placed out of harms way as soon as possible. The Backup Emergency Operating Facility (EOF) and Joint Public Information Center (JPIC) are to be staffed and activated to support offsite communications.

- A. **Assume** the position of Emergency Director in absence of Plant Manager or other Emergency Director designee.
- B. Ensure the following PA announcement is completed:

"ATTENTION ALL PERSONNEL. ATTENTION ALL PERSONNEL. A SECURITY THREAT EXISTS.

PLACE ALL ESSENTIAL ACTIVITIES IN A SAFE CONDITION.

ALL EOF PERSONNEL ASSEMBLE AT THE BACKUP EOF.

OPERATIONS PERSONNEL, FIRE BRIGADE PERSONNEL, AND DUTY CHEMIST ASSEMBLE IN THE CONTROL ROOM.

ALL OTHER PERSONNEL LEAVE THE SITE AND GO HOME."

Repeat announcement after about ten (10) second interval.

- C. Direct the Shift Emergency Coordinator (SEC) (Shift Chemist) to:
 - 1. **Perform** offsite government notifications per checklist PINGP 580.
 - 2. **Activate** EOF personnel to staff Backup EOF and JPIC personnel to staff JPIC per checklist PINGP 580.

RESPONSE TO SECURITY RELATED THREATS

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- D. Ensure NRC is notified of Alert (PINGP 666).
- E. Follow-up Threat actions:
 - 1. **Coordinate** with Emergency Manager, to **designate** appropriate plant representation at the LLEA command center to provide site facility and plant operations advice to the LLEA.

NOTE:

Ongoing management communication will take place from the Backup EOF.

The hub for security communication will be the NMC Hudson Security Command Post at (715) 377-3353.

- 2. **Determine** and **execute** appropriate procedures to place the plant in a condition that will minimize the potential consequences of execution of the anticipated or occurring security threat.
- 3. **Consider** terminating high-risk or special operations that may be in progress (e.g., refueling, resin sluicing, etc.).
- 4. In the case of a credible bomb threat, **consider** shutting down the plant with due consideration for out-plant operator safety.
- 5. **Coordinate** with Security and LLEA to determine an appropriate response to the security event.
- 6. **Keep** plant personnel clear (if possible, 300 to 500 feet) of the affected areas if their personal safety is at risk.
- 7. After security "all clear" is given, **ensure** all appropriate emergency plan actions in PINGP 1125 (SM/SS ED Checklist) are being completed with due consideration for personal safety and security considerations as appropriate.

RESPONSE TO SECURITY RELATED THREATS

NUMBER:

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- 8. <u>IF</u> threat results in plant damage and security threat still exists, <u>THEN</u> **continue** to assess conditions.
- 9. <u>IF</u> threat results in plant damage and security risk to personnel no longer exists, <u>THEN</u> activate remaining ERO per PINGP 1384 and evaluate EALs per F3-2.
- 10. <u>IF</u> threat is resolved, <u>THEN</u> **terminate** event per F3-2.

7.2.3 <u>IF</u> a **NUE** has been declared, <u>THEN</u>:

The **NUE** classification was declared based on a LOW credible security threat. Site personnel are to be placed out of harms way as soon as possible. The Backup EOF and JPIC are to be staffed and activated to support offsite communications.

- A. **Assume** the position of Emergency Director in absence of Plant Manager or another Emergency Director designee.
- B. **Ensure** the following PA announcement is completed:

"ATTENTION ALL PERSONNEL. ATTENTION ALL PERSONNEL. A SECURITY THREAT EXISTS.

PLACE ALL ESSENTIAL ACTIVITIES IN A SAFE CONDITION.

ALL EOF PERSONNEL ASSEMBLE AT THE BACKUP EOF.

OPERATIONS PERSONNEL, FIRE BRIGADE PERSONNEL, AND DUTY CHEMIST ASSEMBLE IN THE CONTROL ROOM.

ALL OTHER PERSONNEL LEAVE THE SITE AND GO HOME."

Repeat announcement after about ten (10) second interval.

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- C. Direct the SEC (Shift Chemist) to:
 - 1. **Perform** offsite government notifications per checklist PINGP 579.
 - 2. **Activate** EOF personnel to staff Backup EOF and JPIC personnel to staff JPIC per checklist PINGP 579.
- D. Ensure NRC is notified of NUE (PINGP 666).
- E. Follow-up Threat actions:
 - Coordinate with Emergency Manager, to designate appropriate plant representation at the LLEA command center to provide site facility and plant operations advice to the LLEA.

NOTE:

Ongoing management communication will take place from the Backup EOF.

The hub for security communication will be the NMC Hudson Security Command Post at (715) 337-3353.

- Determine and execute appropriate procedures to place the plant in a condition that will minimize the potential consequences of execution of the anticipated or occurring security threat.
- 3. **Consider** terminating high-risk or special operations that may be in progress (e.g., refueling, resin sluicing, etc.).
- 4. In the case of a credible bomb threat, **consider** shutting down the plant with due consideration for out-plant operator safety.

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- 5. **Coordinate** with Security and Local Law Enforcement Agencies to determine an appropriate response to the security event.
- 6. **Keep** plant personnel clear (if possible, 300 to 500 feet) of the affected areas if their personal safety is at risk.
- 7. **Ensure** all appropriate emergency plan actions in PINGP 1125 (SM/SS ED Checklist) are being completed with due consideration for personal safety and security considerations as appropriate.
- 8. <u>IF</u> event results in plant damage, <u>THEN</u> reclassify per F3-2 and **go_to Alert** section of this procedure.
- 9. <u>IF</u> threat becomes a HIGH credible threat, <u>THEN</u> reclassify and go to Alert section of this procedure.
- Coordinate with EOF Manager to assess personnel needed in the EOF and release unnecessary EOF and JPIC personnel.
- 11. **Coordinate** with NMC headquarters management personnel and **determine** what essential activities should proceed.

NOTE:

Personnel needed to support these activities should remain at work or called back in. All other personnel should go home. Inform such personnel of the determination through management channels.

12. <u>IF</u> threat is resolved, <u>THEN</u> **terminate** event per F3-2.