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Concept of Emergency Operations

1.1 Description of the Millstone Emergency Planning Zones

1.

The Millstone Power Station is located on Long Island Sound within the Town of Waterford, Connecticut. Millstone has three nuclear power plants: Unit 1, a boiling water reactor, which is permanently shutdown and defueled¹ and being decommissioned; and Units 2 and 3 which are pressurized water reactors. Millstone also has an Independent Spent Fuel Storage Installation (ISFSI), which is located east of the facility within the Protected Area. Millstone has an approximate 10-mile Emergency Planning Zone (EPZ) for the plume exposure pathway and an approximate 50-mile planning zone for the Ingestion Exposure Pathway (IPZ). Millstone Station occupies approximately 500 acres and is located 3.2 miles west-southwest of New London and 40 miles southeast of Hartford.

Local communities within the Millstone plume exposure pathway EPZ include East Lyme, Fishers Island (NY), Groton City, Groton Town, Ledyard, Lyme, Montville, New London, Old Lyme, and Waterford. The Plum Island Animal Disease Center, while physically located within 10 miles of Millstone, is a non-residential federal facility. There are two states within the plume exposure pathway EPZ, Connecticut and New York. The states within the IPZ are Connecticut, Rhode Island, and New York (see Appendix C). Although a small portion of Massachusetts is within the 50-mile radius of Millstone, this area has intentionally been omitted from the Emergency Plan due to the distance from the site and the insignificant amount of land area involved. The Federal Emergency Management Agency (FEMA) has agreed that Massachusetts shall be excluded from the Millstone approximate 50-mile IPZ.

The Millstone Plume EPZ is primarily a residential area, with some urban sections. Peak population totals, including year round residents, seasonal residents, and transients are approximately 205,600 (based on 2010 census data). Appendix J provides a population distribution within the approximate 10-mile EPZ.

The Millstone approximate 10-mile EPZ contains three major industrial facilities: Dow Chemical Corporation (Ledyard), Pfizer Corporation and Electric Boat Division of General Dynamics Corporation (Groton); an air transportation facility (Groton/New London Airport); four military installations: U.S. Naval Submarine Base (Groton), U.S. Coast Guard Academy (New London), Connecticut National Guard Camp and Stone's Ranch Military Reservation (East Lyme); and the State of Connecticut maintained York Correctional Institute (East Lyme).

¹ In accordance with 10CFR50.82(a)(1)(i) and 10CFR50.82(a)(1)(ii), Millstone Unit 1 submitted certification to the NRC that as of July 1, 1998, power operations had permanently ceased and fuel had been permanently removed from the reactor vessel.

1.2 Interrelationships of State/Local/Licensee Emergency Plans

The objective of the Millstone Power Station Emergency Plan is to delineate assessment and protective actions to be taken to minimize the consequences of an incident to the health and safety of the public. Separate plans exist for the licensee, state and local communities within the plume exposure pathway EPZ and the host communities (Table 1-1) to which populations will evacuate. The plans encompass emergency preparedness actions taken by the licensee, the State (all applicable agencies) and the affected local communities. These plans are linked together by a broad overall concept of operations through mutual planning and common notification and assessment procedures. Various federal agencies including the Nuclear Regulatory Commission (NRC), Federal Emergency Management Agency (FEMA), Department of Energy (DOE), and Environmental Protection Agency (EPA) also respond to an emergency in accordance with established federal plans. The licensee will maintain contact with the NRC, the Connecticut Department of Energy and Environmental Protection (DEEP), and the Connecticut Division of Emergency Management and Homeland Security (DEMHS). The DEMHS is responsible for coordinating emergency activities with state and federal agencies and notification of adjoining state governments.

Figure 1-1 illustrates general responsibilities of state, local and licensee emergency organizations. Implementing procedures have been developed to ensure planning effectiveness.

The licensee, state, and local emergency plans include responsibilities and functions and identify resources for each organization. Local radiological emergency response procedures are reviewed and approved by appropriate government officials. State and local emergency preparedness programs include training and periodic drills or exercises.

1.3 <u>Actions</u>

Figure 1-1 outlines responsibilities and actions of the licensee, state, and local communities. Figure 1-2 outlines actions and responsibilities of state and local agencies. Figure 1-3 outlines actions and responsibilities associated with each emergency response facility. The actions escalate through each successive emergency classification.

The licensee response to an incident includes: assessment of plant conditions, incident classification, notification of state and local officials, mitigation of plant system degradation, and assessment of accident consequences. The licensee will classify the incident in accordance with federal guidelines and the State of Connecticut Nuclear Incident Classification Scheme. The licensee will notify designated Connecticut and New York state and local officials and licensee personnel, as appropriate, within 15 minutes of an incident classification. In Connecticut, the state agencies notified are the DEMHS, the State Police and the DEEP, as well as officials in the local EPZ communities. In New York, this notification is provided to Suffolk County and Fishers Island, while a courtesy notification is provided to the State of New York. NRC notification by the licensee is completed via telephone.

After initial classification, the licensee ensures that plant conditions are evaluated and updated information or event reclassification is completed as necessary.

1.4 <u>Assistance</u>

State agencies will mobilize resources as necessary to support local communities in protective action implementation. The Director of DEMHS is authorized to request assistance from federal agencies as necessary.

The licensee emergency response facilities provide office space for federal agency responders.

1.5 <u>Public Notification</u>

Public protective actions will be implemented by use of the Public Alerting System and the Emergency Alert System (EAS). The Public Alerting System consists of electronic sirens at various locations within the Plume EPZ. Procedures for providing prompt notification and information to the public are contained within the State Radiological Emergency Response Plan (RERP). Local agencies will initiate responses to implement and support the protective actions. In the event evacuation is necessary, reception centers that are greater than 15 miles from the station have been designated (Table 1-1).

1.6 Public Information Program

A public information program has been developed to inform EPZ populations of actions to be taken during an emergency. This program, as described in Section 8.0, has been developed for the media and general population and provides general radiological and emergency response information.

<u>Table 1-1</u>

Off-Site Host Community and Reception Centers

Local Community	Host Commun	uity-Reception Facility
East Lyme	New Haven -	Southern Connecticut State University Moore Fieldhouse
Fishers Island, New York	Windham -	Windham High School
Groton, City of	Norwich -	Norwich Technical High School
Groton, Town	Norwich -	Norwich Technical High School
Ledyard	Storrs -	University of Connecticut Fieldhouse
Lyme	New Haven -	Southern Connecticut State University Moore Fieldhouse
Montville	East Hartford -	East Hartford High School
New London	Windham -	Windham High School
Old Lyme	New Haven -	Southern Connecticut State University Moore Fieldhouse
Waterford	East Hartford -	East Hartford High School

Figure 1-1

Emergency Response Organizations Responsibilities

A. Licensee Responsibilities

- 1. Classification of event.
- 2. Activation of on-site TSC, OSC and EOF within 60 minutes of ALERT or higher level incident notification
- 3. Notification of licensee, State of Connecticut, State of New York (Suffolk County) and EPZ communities.
- 4: On-site mitigation actions.
- 5. On-site corrective actions.
- 6. Protective Action recommendations to the State of Connecticut, as required.
- 7. Off-site radiological monitoring.
- 8. Assist State of Connecticut environmental sampling program.

B. State of Connecticut Responsibilities

- 1. Activation of State EOC and Joint Media Center at SITE AREA EMERGENCY or higher level incident notification (standby at ALERT).
- 2. Notification of host communities.
- 3. Notification of Rhode Island and New York (50-mile EPZ states).
- 4. Protective action decision making after declaration of State of Emergency by the Governor.
- 5. Activation of Emergency Alert System (standby at ALERT, activate at SITE AREA EMERGENCY or higher level incident notification).
- 6. Off-site radiological monitoring team deployment and environmental sample collection.
- 7. Implementation of the Traffic Management Plan for affected areas, as required.

C. <u>10-Mile EPZ Communities</u>

- 1. Activation of EOCs at SITE AREA EMERGENCY and higher level incident notification (standby at ALERT).
- 2. Protective action decision making prior to declaration of State of Emergency by Governor.
- 3. Activation of the Public Alert System (sirens) at SITE AREA EMERGENCY and higher level incident notification in coordination with Emergency Alert System activation.
- 4. Implementation of protective actions.

D. <u>Host Communities</u>

- 1. Standby at SITE AREA EMERGENCY (as directed)
- 2. At the direction of the State DEMHS, activate reception center and shelter areas at GENERAL EMERGENCY incident.

E. <u>50-mile IPZ States</u>

- 1. Activate EOCs at SITE AREA EMERGENCY (Standby at ALERT) level.
- 2. Monitor food pathways.
- 3. Implement ingestion pathway protective actions.

Figure 1-2



Department of Energy and Environmental Protection will be notified per the State RERP.

1-6

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Figure 1-3

Licensee Emergency Response Facility Responsibilities (ALERT or higher event classifications)

Control Room

- Initial incident classification²
- Implement mitigation actions
- Implement corrective actions
- Declare incident classification changes, as necessary
- Perform notifications, develop and transmit incident reports²
- On-Shift Dose assessment
- Initial NRC notification (may be done from EOF)

Emergency Operations Facility (EOF)

- Overall Command and Control
- Declare incident classification changes (Director of Station Emergency Operations)
- Communications with NRC, SEOC, DEEP, and local communities
- Notify state and local officials (notifications and incident reports)
- Provide protective action recommendations (PARs) to State DEEP
- Direct off-site radiological monitoring teams and dose assessment activities
- •

Co-located Technical Support Center/Operational Support Center (TSC/OSC)

- Provide engineering and accident management support to Control Room and emergency response staff
- Provide input on incident classification changes to Director of Station Emergency Operations
- Prioritize TSC/OSC assessment and repair activities in coordination with Control Room
- Direct on-site mitigation actions
- Direct on-site corrective actions
- Direct on-site protective actions

Operational Support Center Assembly Area (OSC AA)

- Assemble and brief/debrief emergency teams
- Coordinate emergency team activities with the TSC/OSC and Control Room
- •

State Emergency Operations Center (SEOC)

- Provides direct interface with state officials
- Provides representative to the Joint Media Center

Innsbrook Corporate Support Center (ICSC)

- Provides technical support
- Drafts news releases and obtains executive approval of news releases
- Provides Corporate logistical assistance
- Activated upon declaration of an ALERT or higher at Millstone.

² Incident classifications of UNUSUAL EVENT require classification, notification and completion of incident report only.

Applicability and Supporting Plans

This Plan applies to the Millstone Station Emergency Response Organization in the event of an incident at the Millstone Power Station. This Plan is in agreement with the affected state and local community plans. The supporting plans and their sources are listed in Table 2-1.

Table 2-1

Supporting Plans and Sources

Plan

- Source
- 1. State of Connecticut Radiological Emergency Response Plan
- 2. State Agency Procedures
- 3. New York State Radiological Emergency Preparedness Plan
- 4. State of Rhode Island Ingestion Exposure Pathway Emergency Response Plan
- 5. Local Community Procedures:
 - Town of East Lyme •
 - City of Groton
 - Town of Groton
 - Hamlet of Fishers Island (NY)
 - Town of Ledyard
 - Town of Lyme
 - Town of Montville
 - City of New London
 - Town of Old Lyme
 - Town of Waterford
- 6. Host Community Procedures:
 - Town of East Hartford
 - UCONN / Storrs
 - City of New Haven •
 - City of Norwich •
 - Town of Windham
- 7. Lawrence and Memorial Hospital Master Emergency Preparedness Manual, Section II, Part K, Radiation Accident Plan
- 8. Treatment and Decontamination of Radioactively Contaminated Patient(s) at Middlesex Hospital
- 9. Manual of Protective Action Guides and Protective Actions for Nuclear Incidents

State of Connecticut Division of Emergency Management and Homeland Security, State Armory Hartford, Connecticut

State of Connecticut Division of Emergency Management and Homeland Security, State Armory Hartford, Connecticut

New York State Disaster Preparedness Commission Albany, New York

Rhode Island Emergency Management Agency Cranston, RI

Local Community Emergency Management Agencies

Local Host Community Emergency Management

Lawrence and Memorial Hospital New London, Connecticut

Middlesex Hospital Middletown, Connecticut

EPA-400-R-92-001 U.S. Environmental Protection Agency

Revision 57 August 2018

2.

3.

Millstone Station Emergency Plan Revision 57 August 2018 4.

An UNUSUAL EVENT, ALERT, SITE AREA EMERGENCY or GENERAL EMERGENCY is declared as required by the emergency assessment procedure. Each emergency classification has one or more corresponding state posture codes. Within each classification is a description of the conditions and parameter values which are applicable to classifying the incident. This classification approach is consistent with the NUMARC or NEI methods.

The State RERP requires that incidents be assigned a state posture code at the time of classification. The state plan also defines non-emergency "General Interest Events" and "Radioactive Materials Incidents," which require reporting. This scheme has been adopted by the state agencies and the local communities in the Millstone EPZ. Certain federal classifications and their corresponding posture codes include an associated public protection action recommendation. The station will report the incident classification and a state posture code during an event to local and state authorities.

The emergency classification description, posture codes, discussion, and corresponding licensee actions are also given in Table 4-1 (UNUSUAL EVENT), Table 4-2 (ALERT), Table 4-3 (SITE AREA EMERGENCY) and Table 4-4 (GENERAL EMERGENCY).

The nuclear incident classification description and associated posture code scheme is defined in the State RERP and described in emergency procedures.

Incident classifications are driven by unit specific Emergency Action Level (EAL) tables. Example EAL tables are provided in Appendix I. The emergency classification and action level scheme meet 10CFR50.47(b)(4) requirements.

Once indications are available to plant operators that an emergency action level has been exceeded, the event is promptly assessed and classified, and the corresponding emergency classification level is declared. This declaration occurs as soon as possible and within 15 minutes of when these indications become available.

An analysis of the potential radiological impact of an accident at Unit 1 in the permanently defueled condition has been conducted. Based on this analysis, any potential release is not expected to exceed the EPA PAG exposure levels beyond the exclusion area boundary. For this reason, only the UNUSUAL EVENT or ALERT classifications apply at this unit.

<u>Table 4-1</u>

Unusual Event - Licensee Actions

Class Description

NOTIFICATION OF UNUSUAL EVENT (State Posture Code: DELTA-TWO [if radiation release] or DELTA-ONE): Events are in process or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection. No releases of radioactive material requiring off-site response or monitoring are expected unless further degradation of safety systems occurs.

Actions

- 1. Assessment of conditions and initiation of actual corrective responses, as appropriate.
- 2. Notification of the Innsbrook Corporate Security Control Center.
- 3. Notification of the appropriate Connecticut and New York state agencies and local communities (responsible local officials) within the plume exposure EPZ.
- 4. Notification of the appropriate licensee personnel and NRC.
- 5. Augmentation of on-shift resources, as appropriate.
- 6. Periodic event status updates are provided to off-site authorities.
- 7. Reassessment of conditions and a revised event classification, as appropriate.
- 8. A close-out report is provided with verbal summary to off-site authorities, followed by a written summary to the NRC as required by 10 CFR 50.73, as appropriate.

<u>Table 4-2</u>

Alert - Licensee Actions

Class Description

ALERT (State Posture Code: CHARLIE-ONE): Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of intentional malicious dedicated efforts of a hostile act. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.

<u>Actions</u>

- 1. Assessment of conditions and initiation of actual corrective responses, as necessary.
- 2. Notification of the Innsbrook Corporate Support Center (ICSC) via the Corporate Security Control Center.
- 3. Precautionary dismissal of nonessential station personnel.
- 4. Notification of the appropriate Connecticut and New York state agencies and local communities (responsible local officials) within the plume exposure EPZ.
- 5. Activation of the Station Emergency Response Organization (SERO) and appropriate emergency response facilities (ERFs)
- 6. Establish communications with the SEOC in Hartford, if activated.
- 7. Notification of the NRC.
- 8. Deployment of on-site and off-site radiological monitoring teams (RMTs).
- 9. Periodic event status updates are provided to off-site authorities.
- 10. Periodic meteorological data summaries and dose assessments are developed and provided to off-site authorities.
- 11. Reassessment of conditions and a revised event classification, as appropriate.
- 12. An event report by verbal summary is provided to off-site authorities followed by a written summary to the NRC as required by 10 CFR 50.73, as appropriate.

<u>Table 4-3</u>

Site Area Emergency - Licensee Actions

Class Description

SITE AREA EMERGENCY (State Posture Code: CHARLIE-TWO): Events are in process or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or security events that result in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) prevents effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA Protective Action Guideline exposure levels except near the site boundary.

Actions

- 1. Assessment of conditions and initiation of corrective responses, as necessary.
- 2. Notification of the Innsbrook Corporate Support Center (ICSC) via the Corporate Security Control Center.
- 3. Evacuation of nonessential personnel at the station.
- 4. Implement accountability of station personnel, as required.
- 5. Notification of the appropriate Connecticut and New York state agencies and local communities (responsible local official) within the plume exposure EPZ.
- 6. Activation of the Station Emergency Response Organization (SERO) and ERFs.
- 7. Establish communications with the SEOC in Hartford, when activated.
- 8. Notification of the NRC.
- 9. Deployment of on-site and off-site RMTs.
- 10. Periodic event status updates are provided to off-site authorities.
- 11. Periodic meteorological data summaries and dose assessments are developed and provided to off-site authorities.
- 12. Reassessment of conditions and revised event classification, if appropriate.
- 13. An event report by verbal summary is provided to off-site authorities followed by a written summary to the NRC as required by 10 CFR 50.73, as appropriate.

<u>Table 4-4</u>

General Emergency - Licensee Actions

Class Description

GENERAL EMERGENCY (State Posture Code: ALPHA [significant radiation release] or BRAVO): Events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or security events that result in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels off-site for more than the immediate site area.

<u>Actions</u>

- 1. Assessment of conditions and initiation of corrective responses, as necessary.
- 2. Notification of the Innsbrook Corporate Support Center (ICSC) via the Corporate Security Control Center.
- 3. Evacuation of nonessential personnel at the station.
- 4. Implement accountability of station personnel, as required.
- 5. Notification of the appropriate Connecticut and New York state agencies and local communities (responsible local official) within the plume exposure EPZ.
- 6. Activation of the Station Emergency Response Organization (SERO) and ERFs.
- 7. Establish communications with the SEOC in Hartford, when activated.
- 8. Notification of the NRC.
- 9. Deployment of on-site and off-site RMTs.
- 10. Periodic event status updates are provided to off-site authorities.
- 11. Periodic meteorological data summaries and dose assessments are developed and provided to off-site authorities.
- 12. Provide protective action recommendations to the SEOC.
- 13. An event report by verbal summary is provided to off-site authorities followed by a written summary to the NRC as required by 10 CFR 50.73, as appropriate.

Emergency Response Organization

5.

This section describes the Station Emergency Response Organization (SERO). The SERO (Figure 5-1) replaces and prevails over the normal station organization. Information regarding the structure of the normal operating organization is presented in Section 1.0 of the "Dominion Nuclear Facility Quality Assurance Program Description" (DOM-QA-1) and is incorporated in this document by reference.

A detailed analysis of on-shift personnel assigned emergency plan implementation functions was performed under provisions of 10 CFR 50 Appendix E Part IV.A.9. This analysis determined the staff complement listed in the on-shift column of Table 5-1 can adequately perform required emergency response actions in a timely manner until augmenting SERO staff is required to arrive. This analysis considered a spectrum of events, including FSAR Condition IV events requiring augmented SERO response, a probable aircraft threat, a design basis threat, a fire requiring Control Room evacuation and remote shutdown, a station black out, etc. This staffing analysis is incorporated by reference as a part of this emergency plan.

Personnel are assigned to the SERO based on their normal job qualifications and other specialized training. Personnel assigned receive Emergency Plan training based on their specific emergency functions. The Nuclear Training Department maintains a Training Procedure Description that specifies required training for each SERO function.

The SERO consists of on-shift staff, minimum staffing, and full staffing. The minimum SERO staffing necessary to activate the ERFs consists of the on-shift and minimum staffing positions identified in Table 5-1. The DSEO has the discretion to relieve the CR-DSEO and authorize ERF activation with less than minimum staffing when the necessary functional areas are filled. The specified positions are in accordance with NUREG-0654, Planning Standard B, Table B-1. The SERO personnel identified as full staffing are additional personnel beyond the required minimum, used to enhance the emergency response. The full staffing emergency positions will report as soon as possible after acknowledging notification with a goal of filling these positions within 4 hours. The SERO is activated upon declaration of an ALERT, SITE AREA EMERGENCY or GENERAL EMERGENCY. The on-shift SERO personnel are then supplemented by minimum and full staffing, reporting as indicated on Table 5-1. Additional personnel resources, outside the SERO staff, may be activated, as needed.

The SERO is described in Table 5-1 and Figure 5-1. Table 5-1 illustrates the relationship between emergency and normal positions, describes major tasks, functional areas, emergency locations, and indicates the emergency position type (i.e. on-shift, minimum staffing, or full staffing). The normal on-shift staff complement applies to operating modes. During shutdown, refueling or permanently defueled condition, the on-shift staff may be reduced to the minimum shift staff composition delineated in the administrative controls section of the unit Technical Specifications.

Procedures detailing responsibilities for the various SERO staff positions are listed in Appendix D, as applicable.

This section also includes brief descriptions of the state, local and other organizations that would provide assistance upon request.

Appendix B contains copies of letters of agreement from these organizations.

The on-shift/on-site positions are part of the normal station organization, which includes:

- Shift Manager/Certified Fuel Handler (CFH)
- Shift Technical Advisor (Unit 2 and Unit 3)
- Work Control Senior Reactor Operator (SRO)
- Unit Supervisor (Unit 2 and Unit 3)
- Control Operators (Unit 2 and Unit 3)
- Plant Equipment Operators (Unit 2 and Unit 3)
- Health Physics Technicians (same as Radiation Protection Technicians)
- Chemistry Technician
- Security Shift Operations Supervisor and Security Personnel
- Station Duty Officer
- Fire Brigade
- First Aid Team

The minimum staffing management positions include the following:

- Director of Station Emergency Operations
- Assistant Director, Emergency Operations Facility
- Assistant Director, Technical Support (Unit 2, 3)
- Manager of Technical Support Center
- Manager of Radiological Consequence Assessment
- Manager of Radiological Dose Assessment
- Manager of Communications (Unit 2, 3)
- Manager of Operational Support Center (2 Positions)
- Millstone Emergency Offsite Representative
- Nuclear News Manager
- Manager of Resources
- Emergency Information Specialist
- Corporate Support Director

The Millstone SERO positions are described below:

5.1 <u>On-Shift Positions</u>

5.1.1 Shift Manager $(SM)^3$

The Shift Manager initially assumes command of the SERO as the Control Room DSEO (CRDSEO) following UNUSUAL EVENT or higher classification. In this position, the Shift Manager has the authority and responsibilities of the DSEO. Due to the numerous responsibilities assigned the Shift Manager at the onset of an emergency, actions shall be prioritized as follows:

- (1) ensure safe operation of the plant,
- (2) ensure immediate notification requirements are met,
- (3) obtain operational and radiological assessment of the emergency, and
- (4) perform additional emergency actions as directed by procedures as time and conditions permit.

An SRO shall assume the responsibilities of the SM if the SM should become incapacitated or otherwise unable to fulfill the responsibilities of CRDSEO. If this is required, some delay in completing the prioritized actions is expected. However, assistance is available from the Station Duty Officer and the unit STA. After being relieved by another qualified DSEO, the Shift Manager becomes the Manager of Control Room Operations (MCRO). The following CRDSEO responsibilities cannot be delegated:

- Event classification⁴
- Initiation of station emergency response
- Authorization of mitigation and repair activities.
- Command and control of station emergency response.
- Approval of off-site Protective Action Recommendations.
- Approval of on-site evacuation.
- Authorization of emergency exposures.
- Authorization of off-site notifications.

 ³ For Unit 2, the SM is also a qualified Certified Fuel Handler (SM/CFH).
⁴ The Unit 2 CR DSEO will also classify events specific to Unit 1.

For a Unit 1 event, the Unit 2 SM/CFH functions as the CRDSEO.

5.1.2 Shift Technical Advisor (STA)

The STA is responsible for the analysis of operational data⁵.

5.1.3 Manager Of Control Room Operations (MCRO)

The Manager of Control Room Operations responsibilities include control room operations, interface with ADTS concerning plant status and changing conditions and recommendations for classification changes and corrective actions. The MCRO is also responsible for determining entry conditions into the Severe Accident Management Control Room Initial Response Guidelines and implementation of the Severe Accident Management Guidelines as required.

For a Unit 1 event, the Unit 2 CRDSEO becomes the MCRO.

5.1.4 Emergency Communicator (EC)

The Emergency Communicator is responsible for conducting emergency notifications and activating ERDS.

5.1.5 On-shift Operators

For an operating unit, the on-shift Unit Supervisor (US), Control Operators (CO) and Plant Equipment Operators (PEO) perform plant related functions in accordance with unit and Station procedures, and as directed by the SM/MCRO. The PEOs provide basic on-shift mechanical and electrical maintenance functions, in addition to Radwaste-operations.⁶

5.1.6 Health Physics Technicians (HP)

The Health Physics Technicians provide initial in-plant and on-site radiological support actions as RMT #1.

5.1.7 Chemistry Technician

The Chemistry Technician provides on-shift dose assessment, chemistry support and is available to assist control room personnel in other actions as directed.

5.1.8 Security Shift Operations Supervisor and Security Personnel

The Security Shift Operations Supervisor performs security related functions in accordance with unit and Station procedures, and as directed by the SM/MCRO. The Security Shift Operations Supervisor is assisted by security personnel in providing site access control and accountability.

⁵ This position is not required for a permanently defueled unit.

⁶ For a permanently defueled unit, an on-shift Unit 2 operator (licensed or non-licensed) performs these functions.

5.1.9 Station Duty Officer (SDO)

The Station Duty Officer or available SRO notifies the NRC, assists with communications, precautionary dismissal, and evacuation or assembly of station personnel.

5.1.10 Fire Brigade

The Fire Brigade provides immediate response to a fire on-site.

5.1.11 First Aid Team

The First Aid Team provides emergency medical services for on-site personnel injuries.

- 5.2 <u>Minimum Staffing Positions</u>
 - 5.2.1 Director of Station Emergency Operations (DSEO)

After relieving the CRDSEO, the EOF DSEO assumes overall command and control of the SERO and the licensee emergency response. The DSEO is responsible for classification, notification, release of information to off-site authorities, recommending protective actions to the State of Connecticut, and approval of personnel appointed to fill SERO vacancies during an emergency. The DSEO will ensure that additional SERO staff positions, as determined necessary to effectively respond to the specific emergency, will be staffed within 90 minutes of facility activation. The following DSEO responsibilities cannot be delegated:

- Command and control of station emergency response, including coordination of response by off-site agencies
- Event classification
- Approval of off-site Protective Action Recommendations
- Authorization of emergency exposures greater than 25 rem TEDE for lifesaving activities
- Authorization of off-site notifications
- Requests for federal assistance to support station response
- 5.2.2 Assistant Director, Technical Support (ADTS)

The ADTS reports to the DSEO. The ADTS is responsible for providing command and control of the SERO technical, operational, assessment and repair staff. The MCRO, MRCA, MOSC, MTSC, and MOS report to the ADTS.`

The ADTS primary responsibilities include:

- Ensuring actions are taken to mitigate degradation of plant systems
- Recommending changes in classification to the DSEO
- Approving accident management strategies and ensuring accident management plan is implemented
- Ordering station assembly, evacuation, or sheltering
- Approving on-site personal protective action decisions (PPADs)
- Approving emergency exposure upgrades to 25 Rem TEDE for on-site staff and technical, operational support and security personnel
- Approving the issue of Potassium Iodide (KI) to emergency personnel assigned to the ADTS, at the recommendation of the MRCA
- Evaluating conditions for directing entry into Severe Accident Management Guidelines
- 5.2.3 Manager of Technical Support Center (MTSC)

The MTSC reports to the ADTS. The MTSC analyzes operating data and provides technical support to the ADTS, MCRO, and the MOSC. The TSC Engineering staff and Accident Management Team report to the MTSC and provide accident assessment functions. The MTSC is assisted by a mechanical engineer, reactor engineer, and an electrical engineer.

5.2.4 Manager of Operational Support Center (MOSC)

The MOSC reports to the ADTS. The MOSC assembles, briefs, equips, deploys, and coordinates Emergency Assessment, Repair, and Search/Rescue Teams. The MOSC assumes control of the Operational Support Center. Personnel assigned to assist in performing these functions report to the MOSC. The MOSC is assisted by OSC assistants, maintenance specialists, and other staff.

5.2.5 Assistant Director, Emergency Operations Facility (ADEOF)

The ADEOF reports to the DSEO in the EOF. The ADEOF is responsible for providing command and control of the offsite radiological assessment and radiological support activities. The MRDA, MOC, MOR, and EC report to the ADEOF. The ADEOF is also responsible for:

• Providing recommendations for classification changes based on offsite radiological conditions

- Approving Potassium Iodide (KI) issue to emergency personnel assigned to the ADEOF
- Developing, recommending and updating off-site PARs to the DSEO.
- Off-site radiological dose assessment
- Providing logistics support (personnel) from external response agencies
- Managing the collection and communication of event data for news releases
- Assuming responsibilities of DSEO, in the event the DSEO becomes incapacitated or otherwise unable to perform the assigned duties
- Approving emergency exposure upgrades up to 25 Rem TEDE for SERO personnel who perform actions off-site
- Authorizing contaminated personnel to leave the station
- 5.2.6 Manager of Radiological Consequence Assessment (MRCA)

The MRCA reports to the ADTS. The MRCA coordinates health physics activities including on-site radiological assessment, personnel exposure control, recommendations on the issuance of KI to on-site SERO personnel, and radiation protection programs. Personnel assigned to assist in on-site radiological assessment functions include the Assistant Radiation Protection Supervisor (ARPS) and Radiological Communicators (RADCOM).

5.2.7 Manager of Radiological Dose Assessment (MRDA)

The MRDA reports to the ADEOF. The MRDA coordinates off-site radiological monitoring, environmental sampling, and dose assessment, and provides recommendations for exposure upgrades and KI issuance to offsite SERO responders. The personnel assigned to assist in performing these functions are the Assistant Managers of Radiological Dose Assessment (AMRDAs), Radiological Assessment Engineers (RAEs), Field Team Data Coordinator (FTDC), and the Meteorological Assistant.

5.2.8 Manager of Communications (MOC)

The MOC reports to the ADEOF. The MOC provides information concerning the operation and status of the plant and radiological conditions to the NRC Headquarters Emergency Operations Center, Bethesda, MD and the NRC Region 1 Emergency Response Center as requested.

5.2.9 Radiological Monitoring Team (RMT #2-NAP and SAP)

HP Technicians serve as RMT # 2 and provide radiological surveys, HP coverage, and monitoring and decontamination activities associated with site evacuation. The RMT #2 reports to the MRCA.

5.2.10 Radiological Monitoring Team (RMT #3-#4-#5)

RMTs # 3, #4, and #5 are each composed of a driver and monitor and provide offsite radiological surveys in the event of a release. The EOF RMTs will also collect environmental samples as directed by the MRDA. The offsite RMTs report to the MRDA.

5.2.11 EOF HP Technician

The EOF HP Technician provides HP functions for the EOF and supervises operation of the EOF decontamination facility and count-room. The EOF HP Technician reports to the MRDA.

5.2.12 EOF Emergency Communicator (EC)

The EC performs notifications of corporate, SERO, federal, state and local officials. The EOF EC reports to the ADEOF.

5.2.13 OSC - Assistant Radiation Protection Supervisor (ARPS)

The ARPS reports to the MRCA. The ARPS provides radiological controls for the TSC/OSC and OSC Assembly Area. The ARPS also provides radiological support for emergency teams dispatched from the OSC AA.

5.2.14 Emergency Information Specialist (EIS)

The EIS reports to the DSEO. The EIS assists the DSEO in documenting or logging activities and provides other administrative assistance to the DSEO as needed.

5.2.15 Millstone Emergency Offsite Representative (MEOR)

The MEOR reports to the DSEO and acts as the company spokesperson at the SEOC and Joint Media Center, providing face-to-face communications with state officials and representing the licensee at news conferences. The MEOR may also provide background information concerning licensee PARs provided to the State DEEP and supports the Corporate Executive Spokesperson if one is present.

5.2.16 Nuclear News Manager (NNM)

The NNM reports to the MEOR and supervises Millstone public information activities at the Joint Media Center. The NNM may issue news releases if the Corporate External Affairs Manager is not available.

5.2.17 Manager of Resources (MOR)

The MOR reports to the ADEOF. The MOR fills SERO vacancies and provides 24 hour/day planning for manpower, transportation, food, quarters, equipment and supplies at the site. He/she serves as the coordinator for corporate support.

5.2.18 Technical Support Center-Reactor Engineer (TSCRE)

The TSCRE reports to the MTSC and provides expertise in reactivity transients, reactivity management and shutdown margin calculations. The TSCRE assists the AMT with thermal hydraulic calculations as necessary.

5.2.19 Technical Information Coordinator (TIC)

The TIC reports to the DSEO and is responsible for collecting and entering information and key plant parameter data onto the Critical Parameters status board. The TIC obtains this set of key plant parameters from the Off-Site Facilities Information System (OFIS). This system provides information to the EOF, TSC and the SEOC.

5.2.20 Technical Support Center - Electrical Engineer (TSCEE)

TSCEE reports to the MTSC. The TSCEE is responsible for providing the MTSC with electrical engineering and general support.

5.2.21 Technical Support Center - Mechanical Engineer (TSCME)

TSCME reports to the MTSC. The TSCME is responsible for providing the MTSC with mechanical engineering and general support.

5.2.22 Mechanic, Electrician, I&C Technician, COEL

The mechanic, electrician, and I&C Technician report to the Manager, OSC and are responsible for assessment, repair, and corrective actions.

5.2.23 Corporate Support Director (CSD)

The Corporate Support Director provides direction to the Innsbrook Corporate Support Center (ICSC) staff. The Corporate Support Director is also responsible for monitoring and participating in the corporate conference network, authorizing augmentation of additional corporate resources, and approving releases of information to the public.

5.3 <u>Full Staffing Positions</u>

5.3.1 Control Room Data Coordinator (CRDC)

The CRDC reports to the MCRO and is responsible for communicating plant data and control room activities to the TSC and EOF.

5.3.2 Technical Assistant (TA)

The TA reports to the MEOR and provides the MEOR with technical information as required.

5.3.3 Meteorological Assistant

The Meteorological Assistant reports to the MRDA and provides meteorological data interpretation, calculations and long term meteorological information to support dose assessment activities.

5.3.4 Technical Support Center- Shift Manager (TSCSM)

The SRO assigned to the Technical Support Center assists with communications with the control room and provides technical expertise in accident assessment activities. The TSCSM monitors Emergency Operating Procedure (EOP) progress and assists the ADTS in monitoring plant conditions for possible classification changes.

5.3.5 Operational Support Center (OSC) Assistant

The OSC Assistant reports to the Manager, OSC, and provides operational support by coordinating on-site activities and personnel.

5.3.6 CBETS Operator

The CBETS Operator provides computer based exposure tracking information and assists the MRCA with the administrative activities for exposure upgrades and KI issuance. The CBETS Operator reports to the MRCA.

5.3.7 Radiological Assessment Engineer (RAE) {two positions}

The RAE reports to the MRDA and assists the radiological assessment team in dose calculations.

5.3.8 Radiological Communicators {two positions} (RADCOM)

The RADCOMs report to the MRCA and provide communications for on-site radiological activities. One RADCOM is located in the TSC/OSC and the other is in the EOF.

5.3.9 Assistant Manager, Radiological Dose Assessment (AMRDA) {two positions}

The AMRDAs report to the MRDA and assist in performance of radiological monitoring, environmental sampling, and dose assessment.

5.3.10 Field Team Data Coordinator (FTDC)

The FTDC reports to the MRDA and provides communications and information from field teams to the EOF. The FTDC also briefs and deploys field monitoring and environmental sampling teams.
5.3.11 Manager of Security (MOS)

The Manager of Security reports to the ADTS and is responsible for maintaining accountability and site security.

5.3.12 Accident Management Team (AMT)

An Accident Management Team consisting of an AMT-Leader and an AMT Thermal-Hydraulic Engineer report to the MTSC and assist the Technical Support Center in developing accident response strategies. The AMT is also responsible for evaluating conditions and implementing Severe Accident Management Guidelines. During severe accident management implementation, the AMT reports to the ADTS.

5.3.13 Regulatory Liaison (RL)

The RL reports to the ADEOF and is responsible for accommodating the NRC Site Team dispatched to the station, arranging site access for the NRC Team, providing adequate dosimetry, and responding to questions and comments.

5.3.14 Media Center Liaison (MCL)

The MCL reports to the NNM and is responsible for assisting with media response.

5.3.15 Technical Briefer (TB)

The TB reports to the Media Center Liaison and is responsible for providing technical, plant specific information to the media between official news briefings.

5.3.16 Radiological Briefer (RB)

The RB reports to the Media Center Liaison and is responsible for providing technical radiological information to the media between official news briefings.

5.3.17 Offsite Monitoring Facility (OMF) Staff

The OMF is co-located with the EOF in Norwich. If activated, the EOF team reports to the MRDA through the FTDC. This is a call in position. If needed, the EOF team sets up and operates the OMF to monitor and decontaminate station personnel and monitor station personnel vehicles.

5.3.18 Station Emergency Preparedness Representative (SEPR)

The SEPR reports to the ADEOF and is responsible for assisting the EOF staff in activating and operating the facility.

5.3.19 Station Emergency Planning Liaison (SEPL)

The SEPL reports to the MEOR and is responsible for providing support to SERO and state personnel in the SEOC.

5.4 <u>Corporate Support</u>

- 5.4.1 Corporate Support Coordinator (CSC)
 - Maintains an Events Log
 - Notifies Corporate Risk Management of the event
 - Serves as the central point-of-contact for requests for corporate logistical assist
 - Interfaces with the Manager of Resources
- 5.4.2 Corporate Plant Information Coordinator (CPIC)
 - Monitors the Operations Network and OFIS
 - Provides the Innsbrook Corporate Support Center (ICSC) with technical perspective
 - Interfaces with the Technical Information Coordinator
- 5.4.3 Corporate External Affairs Manager (CEAM)
 - Develops news releases if needed for an Unusual Event or higher incident classification for purposes of public information releases
 - Drafts news released based on input from the Corporate Conference Network data from Millstone, the EIS, and the NNM
 - Through the NNM, coordinates releases of GE news releases with State of Connecticut news releases
 - Distributes news releases to the media
- 5.4.4 Corporate Emergency Plan Specialist (CEPS)
 - Provides assistance with facility operations and interpretation of the Millstone Emergency Plan

- 5.4.5 Corporate Executive Spokesperson (CES)
 - Assumes responsibility as spokesperson from the MEOR. If it is determined that a CES is necessary, the CES will be assigned to the State Emergency Operations Center/Joint Media Center at the Hartford State Armory.

5.5 Other Organizations Providing Assistance

5.5.1 State / Local Assistance

During an emergency, assistance from state or local agencies may be required. The State RERP defines responsibilities of the state and local agencies. Details of provided assistance are contained in Letters of Agreement (Appendix B) with the agencies and the State RERP. [Response agencies will use the Incident Command Systems (ICS), the Connecticut State Response Framework, and the Connecticut Radiological Emergency Response Plan as appropriate in managing large scale incidents. For an event such as a security or Hostile Action, the Waterford Police Department and the State of Connecticut will assist as appropriate and coordinate the response with other local, state, and federal agencies.] These letters are updated annually or as necessary to reaffirm agreed-upon assistance and to verify appropriate communications channels.

5.5.2 Private Agency Assistance

Assistance of private agencies may also be required during an accident. Details of the type of services expected are contained in letters of agreement. The letters are updated annually or as necessary to reaffirm agreed-upon assistance and to verify appropriate communications channels. Appendix B contains a listing of operational letters of agreement.

5.5.3 Federal Assistance

Request for off-site federal assistance will be made through the State DEMHS. The federal agencies contacted can inform the State DEMHS of their response times.

The licensee does not anticipate need for additional federal support in responding to an accident.

The licensee maintains work centers for both FEMA and the NRC at the Station EOF. Work space is also maintained for NRC personnel in the TSC. Dedicated federal telephone communications and access to licensee communications equipment are provided in this area.

Major Functional Area	Major Tasks	Normal Position/Title ⁽ⁿ⁾	Emergency Position/Title	Emergency Location	On-	Minimum	Staffing *	Full	Training	Rad	Resp
	:				Shin	Minutes	Minutes	Staffing (b)	(Refer to App K)	Worker	Quai
Unit Operations and assess. of operational aspects, assessment of	Responsible for safe operation of the unit including the implementation of normal &	Shift Manager (SM)/CFH	Manager of Control Room Operations ^(q)	Affected Unit CR	1 ^(d, i)				1, 4, 6, 9, 14	YES	YES
off-normal operational aspects	emergency operating procedures	Shift Technical Advisor, Security Supervision	Station Duty Officer	Affected Unit CR	1 ^(a)				1,4	YES	YES
		Shift Technical Advisor (STA)	Shift Technical Advisor	Affected Unit CR	1 ^(a, i)				1,4	YES	YES
		Unit Supervisor (US)	US	Affected Unit CR	1 ⁽ⁱ⁾				1, 4, 6, 9, 14	YES	YES
		Control Operator (CO)	со	Affected Unit CR	2 ⁽ⁱ⁾				1	YES	YES
		Plant Equipment Operator (PEO) (Unit 2,3)	PEO	Affected Unit CR	2 ⁽ⁱ⁾				1	YES	YES
		Unit 2 Operator (Unit 1 responder and Unit 2 Appendix R responder)	PEO	Unit 2 CR	1 ⁽ⁱ⁾				1	YES	YES
Emergency Direction and Control, Support of Operational Accident Assessment	Assume command and control of Station Emergency Operations. Event classifications, notifications and PARs.	Manager, Nuclear Operations, Shift Managers/CFH	Director of Station Emergency Operations ⁽⁹⁾	Affected Unit Control Room ^(m)	1 ^(m)				1, 4, 6, 9, 14	YES	YES
		Directors, Managers		EOF			1				
Communications	Management liaison to the SEOC. Coordinates station emergency response actions with that of the State.	Directors, Managers, Nuclear Specialist	Millstone Emergency Offsite Representative	SEOC/Joint Media Center			1(0)		1, 4, 9, 14		
	Provide information to the Chief Technical Spokesperson	Licensing, Engineers/Process Leadership, Maintenance	Technical Assistant	SEOC/Joint Media Center				1	1, 2, 9		

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<u>Table 5-1</u> Station Emergency Response Organization

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Meier Eurotional Area	Major Tooko		Emergency Desition/Title	Emorgonov Loootion	On-	Minimum Staffing *			Training	Pad	Resp
Major Functional Area	Major Fasks	Normal Position/ Ittle**	Emergency Position/Thie	Emergency Location	Shift	30-60 Minutes	60 Minutes	Staffing ^(b)	Summary (Refer to App K)	Worker	Qual
Public Information	Supervise public information activities. Disseminate information received from EOF, armory, and Corporate staff to appropriate corporate and government officials. Coordinate with ICSC.	Various	Nuclear News Manager	SEOC/Joint Media Center			1 ^{(h)(o)}	1	1, 4, 9		
	Develop and distribute news releases if the Corporate External Affairs Manager is not available.										
	Approve news releases.	Senior Executive	Corporate Support Director	ICSC			1 ^(h)		1, 4, 9		
	Support coordination with CT Public Information Staff.	Various	Media Center Liaison	SEOC/Joint Media Center			1		1, 4, 9		
	Support public information effort with technical information.	Various	Technical Briefer	SEOC/Joint Media Center			1		1, 4, 9		
	Support public information effort with radiological information.	Various	Radiological Briefer	SEOC/Joint Media Center			1		1, 4, 9		
Radiological Calculations and Event Communications	Assume command and control of internal/external communications, radiological assessment, and management of the event. Ensures off-site radiological assessments are provided to the State DEEP. Recommends PARs to the DSEO.	Managers, Supervisors	Assistant Director Emergency Operations Facility	EOF			1		1, 4, 7, 9, 14		
Decontamination and Radiation Controls	Provide HP controls for the EOF, supervise Decon Facility	HP Tech	EOF HP Tech	EOF			1		1	YES	YES
Notification and	Notify licensee, corporate, federal, state and local officials	Work Control SRO	Emergency Communicator	Unit CR	1 ^(c)			· ·	1, 3, 4, 9	YES	YES
		STA/Security Supervision/Work Control SRO	SDO	Unit CR		1			1, 4, 9	YES	YES
-		Work Control SRO	Emergency Communicator	EOF			1		1, 3, 4, 9	YES	YES
	Communicate with CR.	SRO	TSC-Shift Manager/CFH	TSC/OSC				1 ^(g)	1, 4	YES	YES
	Activate ERDS	Work Control SRO	Emergency Communicator	Unit CR					1,3,4,9	YES	YES
Notification and Communications (Technical)	Coordinate technical data communication between EOF, CR, TSC/OSC, and government agencies.	Operator Training Staff	Manager of Communications	EOF			1 ^(g)	1	1, 2, 4, 9		
Technical Information Communications	Obtain plant data for Emergency Response Facilities and Technical Assistant at SEOC as required.	Unit Personnel, Operator Training Staff	Technical Information Coordinator	EOF			1 ^{(g)—}	1	1, 2, 4, 6 or 7, 9		

Major Functional Area	Major Tasks	Normal Position/Title ⁽ⁿ⁾	Emergency Position/Title	Emergency Location	On-	Minimum	Staffing *	Full	Training	Rad	Resp
					Shift	30-60 Minutes	60 Minutes	Staffing (b)	Summary (Refer to App K)	Worker	Qual
Administrative Support	Provide administrative support to the DSEO. Maintain log for the DSEO.	Various	Emergency Information Specialist	EOF			1		1, 4, 9		
	Facilitate information exchange with other emergency facilities.			, ,							
Technical Data Communications	Ensure needs for plant data and information are met.	Operator Training Staff	Control Room Data Coordinator	Affected Unit CR				2 ^(g)	1, 2, 4, 9	YES	
On-Site Radiological Accident Assessment	Direct On-site RMTs, sampling program and radiation protection program. Perform dose assessment calculations.	Radiological Protection and Waste Services HP Ops Support HP Ops HP Supervisors	Manager of Radiological Consequence Assessment	TSC/OSC			1	1	1, 4, 9	YES	
Radiological Surveys	HP coverage and station surveys for repair, corrective actions, Search and Rescue, and fire-fighting. Personnel monitoring, and dosimetry issue.	HP Technician	RMT #1	Affected Unit CR	1 ^(d)	1			1, 4	YES	YES
Radiological Protection	Radio Chemistry Assessments / Initial Dose Assessment	Chemistry Technicians	Chemistry Technicians	CR, OSC AA	2 ^(d, f)				1, 15	YES	YES
	Access control	HP Technician	RMT_#2 (A,B,C,D)	NAP/SAP		4			1, 4	YES	YES
Off-site Radiological Dose Assessment	Coordinate off-site sampling program, dose assessment and core damage assessment	Engineers/Manager- Chemistry Supervisors	Manager of Radiological Dose Assessment	EOF			1		1, 4, 5, 7, 9, 11, 12, 13, 14		
	Dose Calculations	Engineers/Analysts/ Specialists	Radiological Assessment Engineer	EOF				2	1, 4, 5, 9, 11, 12, 13		
	Dose Assessment, Radiological Calculations	Chemistry Supervisors, Chemistry Training Engineers/Analysts/ Specialists	Assistant Manager of Radiological Dose Assessment	EOF				2	1, 4, 5, 7, 9, 11, 12, 13, 14		
Radiological Control Within the OSC AA	Provide radiological controls within the TSC/OSC, OSC AA and provides radiological support for emergency teams dispatched from the OSC AA	HP	Assistant Radiological Protection Supervisor	OSC AA				-	1, 4	YES	
Radiological Radio Communications	Deploy RMTs, collect data.	Site Services, HP Services	Field Team Data Coordinator	EOF				1	1, 4, 5, 9		
Radiological Surveys	Off-site Surveys	HP/Various	RMT #3-4-5 and Drivers	EOF		2	4		1, 4	YES	YES
Meteorological Services	Provide meteorological data interpretation, calculations, long term meteorological information	Environmental Specialists	Meteorological Assistant	EOF				1 :	1, 4, 10	,	
Environmental Services and/or Health Physics	Plume and Ingestion Pathway Sampling	Environmental/HP Personnel and/or HP REMP Tech	RMT #3-4-5 and Drivers	EOF				20		YES	

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Major Functional Area	Major Taaka	Normal Desition/Title ⁽ⁿ⁾	Emorgonov Bosition/Title	Emergency Location	On-	Minimum Staffing **		Full	Training	Rad	Poen
	Major Tasks	Normal Position/ Hite	Emergency Position/ hite		Shift	30-60	60	Staffing ^(b)	Summary	Worker	Qual
					<u> </u>	Minutes	Minutes		(Refer to App K)		
Contingency Offsite Contamination Monitoring for Station Staff	Set up and operate Offsite Monitoring Facility	Radioactive Material Technician	OMF Staff			-		6"	4	YES	
Accident Assessment Management and Consequence Mitigation	Assume command and control of the station operating, technical assessment and repair staff. Recommends changes to classifications	Manager-Operations, Supervisor Nuclear Shift Operations, Supervisor- Operator Training	Assistant Director, Technical Support	TSC/OSC			1 ^(g)	1.	1, 4, 6, 8, 9	YES	
Unit System Engineering	Responsible for analysis of operations data, development of procedures, recommend repair, and corrective actions	Manager-Engineering/ Supervisors, Engineers Manager-Site Services	Manager of Technical Support Center	TSC/OSC			1	1	1, 4, 7, 9	YES	
	Assist Manager of Technical Support	Mechanical Engineer	TSC-ME	TSC/OSC	-		1	1	1, 2, 4	YES	
		Electrical Engineer	TSC-EE	TSC/OSC			1	1	1, 2, 4	YES	
		Reactor Engineer	TSC-RE	TSC/OSC			1		1, 2, 4	YES	
		Nuclear Instrument Technician	Control Operations Electrical (COEL) Specialist	OSC AA			1		1	YES	
Plant System Engineer Repair and Corrective Action	Assist Manager of Technical Support. Provide accident analysis	Safety Analysis, Nuclear Fuel Engineering	Accident Management Team- Leader	TSC/OSC				1	1, 2, 4, 8	YES	
		Safety Analysis, Nuclear Fuel Engineering	AMT-Thermal-Hydraulic Engineer (T-H)	TSC/OSC		-		1	1, 2, 4	YES	
Repair and Corrective Actions	Evaluation, repair, and corrective actions	Manager-Maintenance Supervisor	Manager of Operational Support Center	TSC/OSC, OSC AA			1	1	1, 4, 9	YES	
		Mechanic	Mechanic	OSC AA		1	1		1	YES	YES
		Electrician	Electrician	OSC AA		1	1		1	YES	YES
		I&C Technician	I&C Technician	OSC AA		1	1 .		1	YES	YES
Operational Support	Coordinate on-site activities and personnel	Supervisor-Maintenance	OSC Assistant	TSC/OSC, OSC AA				2	1, 4, 9	YES	
		Supervisor-Maintenance	OSC Assistant	TSC/OSC. OSC AA				2	1, 4, 9	YES	
Resource Acquisition & Personnel Dispatching	Coordinates requests for assistance, organizes station personnel for relief shift work, account SERO personnel. Coordinate acquisition of personnel and equipment from	Various	Manager of Resources	EOF			1		1, 4, 9		
Information Resources	Maintain computer availability	IT Personnel	None	Millstone Station				(i)			

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Major Eurotional Area	Major Tasks	Normal Desition/Title ⁽ⁿ⁾	Emorgonov Bosition/Title	Emorgonov Logotion	On Shift	H Minimum Staffing **		E.ill	Training	Red	Deen
Major i unctional Alea		Normal Position/Title**	Emergency Position/The		On-Shin	30-60	60	Staffing ^(b)	Summary	Worker	Qual
	· · · · · · · · · · · · · · · · · · ·					Minutes	Minutes	Otaning	(Refer to App K)	••••	Quu
Firefighting	Firefighting and communicate and strategize with Control Room	Fire Brigade	Fire Brigade	As Required	Per TRM ^(a) and		Local Comm Support		1	YES	YES
Secret and Reserve	Correl and receive an eventione	O	Oit. Dans an al / Ctation	As Deguined	PPER						VEO
Operations	Search and rescue operations	Security Personnel / Station Personnel, as required	Personnel	AS Required	Per Sec. Plan					YES	YES
External Response Logistics	Provide logistics support for external response personnel. Liaison with NRC Site Response team.	Licensing, Engineering	Regulatory Liaison	EOF				1	1, 4		
Backup SERO Notifications	Communications with ADTS/DSEO. Backup SERO Notification System	Security Personnel	Security Person	CAS/SAS	1				1	YES	YES
Communications	HP Communications	HP Staff	RAD Communicator	EOF, TSC/OSC			-	2	1, 4	YES	
Exposure Control	Exposure Monitoring	HP Staff	CBETS Operator	OSC AA				1	1,4	YES	
First Aid	Emergency Medical Services	First Aid Team	First Aid Team	As required	2 (a)		Local Comm Support		1	· YES	
Site Access Control and Personnel Accountability	Establish EOF security. Directs Security Personnel in support of emergency operations (firefighting communications, personnel accountability) assist in personnel accountability	Security Personnel	Manager of Security	TSC/OSC				1	1, 4, 7, 9	YES	
	Establish station security. Support emergency operations and perform personnel accountability	Security Personnel	Security Personnel		Per Security Plan				1	YES	YES
	Supervise on-site security operations	Security Shift Operations Supervisor	Security Shift Operations Supervisor		1 ^(a)				1, 7	YES	
Support	Provide support to SEOC staff	EP /Various	State Emergency Planning Liaison	SEOC/Joint Media Center				1	1,4,9		
	Provide support to EOF staff	EP Staff	Station Emergency Preparedness Representative	EOF				1	1,4,9		
				Totals Unit 1	10 ^(k, l)	11	30 ^(e)	38			
				Unit 2/Unit 3	15 ^(k, l)	11	30 ^(e)	38			

Table 5-1 Notes:

- May be provided by shift personnel not assigned an Emergency Position (exception is First Aid Team). а
- Full staffing are beyond minimum required for facility activation which constitute a fully augmented SERO. Personnel respond as soon as possible upon notification with a goal of filling these positions within 4 hours.
- Station position (Counted as affected unit resource). с
- One for Unit 1/Unit 2; one for Unit 3; (for Chemistry and Health Physics, two each per site) d
- Assigned, affected unit resources, additional SERO staff will respond from non-affected units. е
- Overall station resource (accounts for additional personnel from the unaffected units). f
- One needed for Unit 2 and one needed for Unit 3 (only 1 required for minimum staffing for activation). g
- h Carries out independent responses at time of incident notification.
- Only one senior reactor operator, reactor operator and non-licensed operator are required on shift under non-operating conditions (shutdown and refueling). For a permanently defueled condition, i only one certified fuel handler and one equipment operator are required on shift.
- Call-in specialized resource- (Non-SERO personnel). i
- Total does not include Security staff or Fire Brigade personnel on-shift. k
- On-Shift total reflects Shift Manager / Affected Unit Control Room DSEO as one position. 1
- m For a Unit 1 event the Unit 2 SM/CFH becomes the CRDSEO; after transferring responsibilities to the ADTS and EOF DSEO, the Unit 2 CRDSEO becomes the MCRO.-
- Higher level organization personnel may be used to fill these roles as necessary. n
- A 90-minute goal has been established for the Millstone Emergency Offsite Representative and Nuclear News Manager who report to the CT SEOC. 0
- Position will be staffed as needed by called in personnel and only as required. Staff may be augmented by any available HP Technicians, ARPSs, and/or CBETS operators. p.
- The Shift Manager (SM) becomes the Control Room Director of Station Emergency Operations (CR DSEO) until relieved by the EOF DSEO. The SM then becomes the Manager of Control Room Operations. q.
- A 30 to 60-minute goal has been established for the identified individuals. It is expected that some of these individuals will report within about 30 minutes, with the remainder arriving at various times during the next 30-minute interval.
- Indicated Staff response times are from the time of notification to report to emergency assignments.

Figure 5-1



Senior SERO Management Structure





Organization of Station Emergency Management Personnel (Page 2 of 3)



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Organization and Location of Station Emergency Management Personnel (Page 3 of 3)



Offsite SERO Structure

Indicates positions necessary for facility activation.

Indicates fully augmented organization positions.

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Emergency Measures

6.

Emergency measures begin with the identification and classification of an emergency and the activation of the appropriate emergency organizations. Emergency measures include assessment actions, corrective actions, and recommendation of protective actions. The Emergency Action Levels (EALs) have predetermined values or conditions which, when met or exceeded, require declaration of an emergency classification, notification of the licensee emergency response organization, state and local officials, and corrective and/or protective actions. A general outline is presented as follows:

6.1 <u>Notification and Activation of Emergency Organizations</u>

The authority and responsibility for initially classifying and declaring emergencies, initiating notification to emergency organization personnel, state and local officials and the NRC and initiating immediate actions necessary to limit the consequences of the emergency reside with the Shift Manager (SM), who is on site 24 hours a day.

The SM initially assumes command and control of the SERO as the Control Room Director of Station Emergency Operations (CRDSEO). The SM will function as CRDSEO until relieved by the EOF DSEO, a shift relief occurs, or the event is terminated. After relief by the EOF DSEO, the SM assumes responsibility as Manager of Control Room Operations (MCRO).

The CRDSEO /DSEO is responsible for ensuring that timely and appropriate notifications are made.

SERO responsibilities may be transferred during a normal shift rotation when a qualified relief reports on site and is fully briefed on current and past conditions.

For emergencies that are not unit-specific, the Unit 3 Shift Manager assumes the position of DSEO until relieved, or the event is terminated.

The SERO is activated by a combination of public address (PA) system announcement, Station emergency alarm actuation and electronic message. The PA announcement can include the incident location, emergency classification and personnel information. Initially, the emergency organization consists of normal on-shift personnel. Notification of the emergency organization and state and local officials is by the Emergency Notification and Response System (ENRS) which is initiated by Control Room personnel. If a failure of either system should occur, notifications will be made using commercial telephone lines and/or satellite phones. The Connecticut State Police will assist with backup notifications to state and local officials, as necessary. Following the declaration of a "State of Emergency" by the Governor, DEMHS may direct the DSEO to discontinue use of the ENRS for further state and local notifications and directly communicate with the SEOC for classification changes or event updates. The State will then assume responsibilities for notification of the local town EOCs. The SEOC will coordinate activation of the Public Alerting System sirens with the local governments, as needed. The ENRS consists of computer based systems. When activated, messages are sent to phones and/or electronic devices. The ENRS is used for notification of emergency events and decreases the time necessary to notify off-site officials. The ENRS message satisfies the requirement to notify state and local officials of the emergency classification level within 15 minutes after declaration of an emergency. State and local officials acknowledge the notification. The ENRS records the time the call was completed and provides more detailed incident information. A goal of 15 minutes has been established for completing the initial SERO notification sequence.

Electronic messages include the following information:

- Station and unit identification
- Event classification (including State Posture Code)

Incident report forms are sent to State and local officials by electronic means with the following additional information:

- Date and time of event classification
- Name and Title of communicator
- Verbal summary of incident details (major and minor EAL headings)
- Current release information
- Meteorological conditions (if available)
- Classification change, update, termination

Message updates which are provided as plant status and conditions change include forecast meteorological conditions, plant status, any offsite services requested, and whether or not access to the site has been restricted.

Details concerning release type, quantities and actual or projected dose rates will be developed, as appropriate, and provided to responsible officials, when requested.

The ENRS provides initial event notification to the emergency organizations. When emergency facilities are activated, various communications systems are used. These systems allow transmission of detailed technical information of the event in progress as well as direct voice communications between facilities and decision makers. Detailed radiological information will be relayed to the DEEP at the SEOC for analysis and decision making.

A representative from the State DEEP responds to the EOF and provides a liaison with the EOF and SEOC staff.

The Millstone Emergency Offsite Representative, Technical Assistant, and Nuclear News Manager respond to the State EOC. They are supported by the Media Center Liaison, Technical Briefer, Radiological Briefer, and State EP Liaison.

Work space and communications for federal agencies and the Town of Waterford are located in the EOF. The TSC provides a work area and limited communications for the NRC.

The SEOC in Hartford uses various communication systems to provide information to the DEMHS Region Coordinators and the local community EOCs. The systems are used to transmit technical, radiological, administrative and resource data between the local community EOCs and the SEOC. Radio, telephone, and FAX devices are used to provide continuous contact with the affected areas. The SEOC coordinates the Public Alerting System siren activation to immediately precede Emergency Alert System (EAS) broadcast messages.

The primary notification (electronic and dedicated telephone lines) contacts and the continuing lines of communication between on-site emergency response facilities and off-site emergency response centers are indicated in Figures 7-1a through 7-1c.

6.2 <u>Assessment Actions</u>

6.2.1 Initial Assessment

Event classification is based on EALs. The EAL tables provide an incident classification based on instrument readings available in the control room or other observations. The NRC incident classification and corresponding state posture codes are transmitted to state and local officials via the ENRS.

On-Shift dose calculations are conducted, when appropriate, and used to validate the incident classification and any PAR if applicable.

The Shift Technical Advisor (STA) provides independent assessment of emergency actions. When activated, the TSC assumes a more expanded role and responsibility beyond that of the STA.

Additional technical services and support are obtained as necessary from a combination of station personnel, corporate personnel, and off-site assistance companies/agencies. The State DEEP does an independent assessment of plant conditions and off-site dose assessment.

6.2.2 Protective Action Recommendations (PARs)

The State RERP includes procedures for use by state and local community officials for public protective actions in the plume exposure pathway. Public PARs requiring evacuation are to be initiated only for GENERAL EMERGENCY events.

PARs beyond those associated with the event classification are developed using dose assessment or plant conditions in accordance with "NUREG-0654, Supplement 3" guidance for severe reactor accidents. The licensee will provide a PAR to state and local authorities.

If PARs are warranted from the Control Room before activation of the station response organization, the appropriate PARs will be transmitted directly to the State DEEP. Following activation of the station response organizations, PARs are developed and issued directly to the SEOC. The provided PAR will be revised if changing conditions warrant.

When authorized, protective actions are implemented by state and local officials using the Public Alerting System sirens in conjunction with the EAS. Route alerting provides backup alert and notification capability. The Governor of Connecticut is responsible for public protective action decisions after a state of emergency is declared. Before a state of emergency declaration, local chief executives are authorized to take the public protective actions associated with the GENERAL EMERGENCY posture codes.

When emergency response facilities are activated, the State DEEP will collect and process information to independently verify and recommend changes, if necessary, to the licensee provided PARs.

6.2.3 Dose Assessment

Radiological assessments by the SERO include determination of radiation exposure rates by both analytic and direct measurement methods. Direct measurements are performed by RMTs deployed to field monitoring locations. The analytic methods use computerized dose calculation models. Projected dose estimates are calculated for different downwind directions and distances. The results may require reclassification of the emergency. Further assessments are performed as required and updates are provided to off-site authorities. On-site radiation protection activities are coordinated by the MRCA. Off-site RMT activities are coordinated by the FTDC under the direction of the MRDA. Field data and projected dose information are transmitted to the State DEEP, as necessary.

The emergency plan procedures contain methods for relating the various measured parameters to dose rates for the accident conditions.

Dose assessment is performed by licensee personnel assigned to the control room or EOF who perform the calculations. Information from dispatched field monitoring teams and plant conditions are then used to verify incident classification.

Use of Station Monitors

а.

The station has an extensive system for monitoring radioactive materials released to the environment. As a general requirement, the various process monitors are capable of initiating appropriate alarms and/or actuating control equipment to provide containment of radioactive materials if pre-established limits are reached.

High range containment radiation monitors have been installed in the Unit 2 and Unit 3 containments to be used to determine containment atmosphere curie inventory. Procedures have been established for converting these monitor readings into potential dose assessment data.

For Unit 2 and Unit 3, high-range radiation monitors have been installed at the potential effluent points to determine effluent release rates if existing normal range stack monitors should go off-scale or become inoperative during an emergency. These high-range monitors cover the entire postulated range of releases and exceed the values specified for a GENERAL EMERGENCY. These systems allow for monitoring releases during emergency conditions. Procedures have been established for converting these monitor readings into release rates. RMT surveys are taken to verify release rates.

Unit 1 gaseous effluent releases are continuously monitored for radioactive gases by a Spent Fuel Pool Island (SFPI) radiation monitoring system. Gaseous effluent is sampled for radioactive particulates by a continuous sampling system which collects samples for periodic analysis.

The site has a permanent meteorological installation that records wind speed, direction, and temperature differences continuously in the Unit 2 and Unit 3 Control Rooms and at 15-minute intervals via a computer system.

b. Use of Emergency Action Levels (EALs)

Unit 2 and Unit 3 EALs contain effluent monitor radiation levels which correspond to predetermined dose assessments and appropriate emergency classification levels.

Unit 1 EALs contain effluent monitor release limits established in the Radiation Effluent Monitoring Manual.

c. <u>Dose Estimates for Radioactive Releases</u>

Upon determination of an emergency or potential emergency condition that is anticipated to have off-site consequences, off-site doses are estimated. The critical exposure pathways for short-term emergency actions are the external dose due to noble gases and the internal thyroid dose due to inhalation of radioactive iodine. In these cases, estimated release rates are combined with meteorological dispersion estimates in order to predict off-site doses. Station emergency plan procedures include a method to calculate the distances at which the Environmental Protection Agency protective action guide (PAG) limits may occur.

When the station EOF is activated and radiological dose assessment personnel have arrived, estimates of off-site doses based on more sophisticated techniques and by analysis of actual RMT data can be provided.

6.2.4 Release Rate and Dose Estimate Methodology

a. <u>Noble Gas Release Rate Estimates</u>

Gaseous effluent readings for Unit 2 and Unit 3 are obtained and converted to release rates by multiplying the readings by an appropriate factor. If the monitors are off-scale, the high-range radiation monitors are used to determine release rates. The high-range radiation monitor readings are converted to a release rate using a predetermined factor. Grab sample results, if available, may be more accurate than gross monitor readings. Release rates based on actual samples, if available, will be used in lieu of monitor based calculations.

If no release estimates based on fixed monitors are available, the release rate will be estimated using field monitoring results.

Unit 1 noble gas release estimates for accidental releases out the SFPI vent will use an area monitor and conversion factors to determine the quantity of Kr-85 being released.

b. <u>Radioactive Iodine Release Rate Estimates</u>

If radioactive iodine grab sample results are available, they may be used to calculate the total iodine release rate. If grab samples are not available, the total noble gas release rate is multiplied by a predetermined iodine-to-noble gas ratio (depending on the plant conditions) to obtain the iodine release rate.

Core Damage Estimates

c.

Core damage estimations serve several roles within the Millstone Emergency Preparedness Program. For planning purposes, core damage considerations are used as the bases for several of the Emergency Action Level (EAL) initiating conditions and as the threshold for the declaration of a General Emergency (the definition of a General Emergency specifies conditions which involve 'substantial' core degradation or melting as one of the bases for classification). From an implementation perspective, core damage estimations provide a means of realistically differentiating between the four core states (no damage, clad damage, overheat, and melt) to:

- Evaluate the status of the fuel barriers and how their status relates to the risks and possible consequences of the accident.
- Determine the potential quality (type) and/or quantity (%) of source term available for release in support of projected offsite doses and protective action recommendations.
- Provide information which quantifies the severity of an accident in terms that can be readily understood and visualized.
- Support the determination of radiological protection actions that should be considered for long term recovery activities.

The assessment methodologies used by Millstone Station are intended to provide a rapid best estimate of core damage which, when evaluated together, help to develop an overall picture of the extent of core damage. The methods used to estimate the amount or type of core damage occurring under accident conditions include the following:

- <u>Core Uncovery Time:</u> An indirect method used to indicate the type of core damage (clad failure or fuel melt). Applicable for all types of accidents. Provides a relatively accurate estimate of the core state early in the event. Valid any time following an accident.
 - <u>Core Temperatures:</u> An indirect method used to indicate the type of core damage. Applicable for all types of accidents. Does not provide numerical estimations but is useful as a yes/no indicator or as confirmation of other methods. Valid any time following an accident.
- <u>Containment and Main Steam Line Radiation Levels</u>: An indirect method used to determine the amount of core damage. Applicable to LOCA type accidents. Based upon an end-of-life source term and static nuclide ratio assumptions yielding a limited accuracy. Valid any time following an accident.

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- <u>Containment Hydrogen Concentration</u>: An indirect method used to establish the type of core damage. Applicable to LOCA type accidents where all the hydrogen generated by the metal-water reaction is released into containment. Valid any time following an accident.
- <u>Sample Analysis Isotopic Ratio Comparison:</u> A direct method used to establish the type of core damage. Compares expected isotopic ratios with a sample to determine a general core state. Applicable under all types of accidents. Valid any time following an accident.
- <u>Sample Analysis Presence of Abnormal Isotopes:</u> A direct method used to indicate a degree of fuel melt by the presence of unusually high concentrations of the less volatile fission products. Applicable under all types of accidents. Valid any time following an accident.
- <u>Sample Analysis Concentration Evaluation</u>: A direct method which yields the most accurate numerical estimations. Applicable for all types of accidents. Requires the sampled system(s) be in a steady state which usually prevents its use until the plant is in a stable condition.

d. <u>Meteorological Data</u>

Input to the meteorological section of the procedures includes effective release height, temperature differential, wind speed, and wind direction based on actual or projected readings.

Meteorological data, acquisition and flow are described in Section 7.13.

e. <u>Total Effective Dose Equivalent (TEDE)</u>

The calculated TEDE contributions will include plume external exposure, ground external exposure and inhalation exposure. TEDE doses are calculated for various downwind distances using computerized methods.

f. <u>Committed Dose Equivalent (CDE)-Thyroid</u>

The radioactive iodine release rate and meteorological data are used in computerized methods to obtain the projected maximum off-site CDE thyroid dose at various downwind distances.

g. <u>Verification</u>

When appropriate, dose rates are verified by on-site and off-site RMTs which have been deployed with portable emergency radiological instrumentation and communication equipment.

h. <u>RMT Mobilization and Monitoring</u>

- Notification/Coordination Methods When notified by the station public address system, the RMT members report to the EOF, Control Room, North Access Point (NAP), South Access Point (SAP), or other areas as assigned. The teams are then dispatched by the appropriate SERO managers.
- 2) Composition Each of the off-site RMTs consists of two persons, at least one is a health physics technician. The on-site RMTs are health physics technicians.
- Transportation Three dedicated company vehicles are used for transporting off-site RMTs.
- 4) Monitoring and Equipment A general list of radiological monitoring kit equipment is included in Appendix E. Complete inventories are provided in station procedures. The kits are provided with appropriate radiological monitoring equipment to measure radioiodine concentrations in air as low as $10^{-7} \,\mu$ Ci/cc.
- 5) Environmental Dosimeters of Legal Record (DLRs) and air particulate samples, air sample cartridges, goat milk, cow milk, soil, vegetation, and water are collected by Environmental Services (ES), Health Physics personnel, or HP REMP Tech.
- 6) Deployment Time- The off-site RMTs can be deployed in approximately one hour. The on-site RMTs can be deployed immediately after equipment checks.
- 7) RMT Communication- The RMTs report information via radio communications or telephone.
- i. <u>Off-site Monitoring by DEEP</u>

The State DEEP dispatches off-site monitoring teams of state personnel.

j. <u>Plume Monitoring Over Water</u>

Millstone Environmental Lab vessels may be used to provide transportation for plume monitoring over water. RMT personnel will be assigned to perform over water monitoring as necessary.

6.2.5 Secondary Dose Assessment

Long-term off-site radiological dose assessment (secondary assessment) is provided by the State DEEP. The State DEEP is assisted, as necessary, by Millstone and other agencies. After the assessment has been completed, the State DEEP recommends protective actions to the Governor for approval.

6.3 <u>Corrective Actions</u>

Corrective actions are implemented by the use of detailed station procedures. These procedures prioritize actions to prevent or mitigate the consequences of an accident.

The instrumentation, control systems monitors, and radiation monitoring systems provide indications of the safe and orderly operation of the unit. These systems provide the operator with the information and controls needed to start up, operate at power, and shut down the plant. They further provide the means to cope with an abnormal operating condition should it occur. Control of plant systems and information displays are centralized in the control room. This instrumentation provides the basis for initiation of corrective actions.

The following additional corrective actions are implemented during emergency situations as necessary.

6.3.1 Fire Fighting

Procedures for responding to fire emergency situations are in place. Firefighting strategies for plant areas are available for use by responding personnel. The Shift Fire Brigade is in charge of extinguishing the fire.

Applicable health physics, security, and safeguards procedures apply. If outside assistance is needed, the Waterford Fire Service is called.

6.3.2 Damage Control, Repair and Decontamination

Station personnel normally provide decontamination, repair and damage control services. For ALERT, SITE AREA EMERGENCY and GENERAL EMERGENCY operations, the support of specialized outside contractors is obtained, as required. Decontamination of personnel and equipment is conducted in accordance with approved procedures.

6.4 <u>Protective Actions</u>

Protective actions are taken when an incident has occurred, or may occur, that could result in concentrations of airborne radioactivity or radiation levels that exceed normal limits for a specific area or areas and cannot be readily controlled, or personnel safety from other causes is threatened. Emergency procedures provide guidance for protective actions, such as evacuation, assembly or sheltering.

6.4.1 On-site Protective Actions

Persons in the owner-controlled area of the site, but outside the protected area, are considered members of the general public. Persons within the protected area are either station personnel, contractor personnel, or visitors. If the protected area has been evacuated, Security will inspect locations outside the protected area to ensure all personnel have evacuated.

The radiological protective actions specified in this section and in Emergency Plan Procedures are augmented by the normal health physics procedures and are used during an emergency unless different actions are identified and authorized by the ADTS. The MRCA establishes radiological control areas (RCAs) in response to the incident. Access to the RCA is controlled by the emergency team briefing process unless immediate access is authorized by the ADTS to facilitate emergency repairs.

a. <u>Notification</u>

The actuation of radiation monitoring alarms, the station emergency alarm, fire alarms, and public address announcements alerts personnel to hazardous conditions and response actions. Station procedures provide for a range of protective actions to protect onsite personnel during hostile action.

b. <u>Security and Site Access Control</u>

If station access has been restricted, traffic is diverted through a security checkpoint in the Simulator Training Building parking lot. Site access roads will be manned and barricaded as necessary. Station access controls will be supported by the Waterford Police Department and the Connecticut State Police, as necessary. Personnel accessing the protected area must be authorized. Station security procedures provide detailed guidance for responding to an emergency.

Precautionary Dismissal of Non-Essential Personnel

A precautionary dismissal of non-SERO personnel occurs at the Alert level declaration and can be initiated from the Control Room or TSC. The CR DSEO or ADTS can elect NOT to conduct the precautionary dismissal if the nature of the event warrants such judgment.

A precautionary dismissal directs all non-essential Millstone employees, contractors, and visitors to leave the site.

d. <u>Evacuation</u>

c.

A site evacuation is initiated at the SITE AREA EMERGENCY or GENERAL EMERGENCY classification levels. Site evacuation may be called for at the ALERT level classification depending on the environmental conditions at the time of the event. All non-essential personnel are instructed to leave the Owner Controlled Area. Personnel can be evacuated in about 30 minutes. Evacuation may be suspended or deferred during certain situations (e.g., Security-related, toxic gas), until the threat is resolved. Evacuation will be implemented as quickly as possible thereafter, given the specific situation.

Evacuation can involve the movement of large numbers of personnel out of the Protected Area through the turnstiles at the NAP or SAP. An evacuation alarm actuator is located in the Unit 2 and Unit 3 control rooms. A public alert system is in place in the protected area to communicate evacuation messages in the event of a station emergency.

Evacuation may warrant station egress control by Security. Following discussion with the Connecticut State Police and the Waterford Police Departments, Security will provide specific instructions to exiting personnel as requested by off-site authorities. As part of evacuation, station personnel may be directed to a specific location for monitoring and decontamination.

Other situations which involve the evacuation of personnel from occupied localized areas onsite must be controlled on a case-by-case basis.

e. Local Area Evacuation

Local area evacuation is an evacuation of a building, area, unit, or multiunits for the immediate protection of station personnel from a hazard with limited exposure potential. It is a standard response immediately taken by control room personnel upon acknowledging the hazard.

f. <u>Sheltering</u>

Sheltering is a short-term action taken in specific situations where there is insufficient time available to conduct an evacuation due to the hazard being short lived or threatening the safety of the evacuating population. If a release or hazard is projected to occur within 30–60 minutes, sheltering in place with subsequent staggered movement of personnel may be considered.

g. <u>Assembly</u>

Assembly occurs upon declaration of an ALERT or higher emergency classification level. Minimum staffing and full staffing SERO positions report to their emergency response facilities (control room, EOF, TSC/OSC, OSC AA). SERO personnel assigned to the SEOC report to Hartford. Non-essential personnel are not involved in assembly activities. The Assembly Areas are used to retain SERO personnel who may be needed in the near term to support the event.

h. <u>Accountability</u>

Accountability is conducted at a SITE AREA or GENERAL EMERGENCY and may be conducted at the Alert level following SERO activation and the completion of the precautionary dismissal.

Accountability is the process of verifying the location of personnel who are inside the Protected Area. That is, any unaccounted for person that has keyed into the Protected Area (NAP/SAP) and is not keyed into a vital area, the TSC/OSC, or the OSC Assembly Area (cafeteria) will be identified as missing. Accountability is required to be completed within 45 minutes of its initiation (the names of any missing persons identified to the DSEO or ADTS and announced over the PA).

If precautionary dismissal or evacuation could endanger plant personnel, these actions may be deferred until the condition has been resolved. When conditions warrant, dismissal, evacuation and accountability will be performed, as appropriate.

i. <u>Personnel Monitoring</u>

All personnel within the Protected Area are monitored for radioactive contamination before leaving the Owner-Controlled Area. Portal monitors and RMTs will be used for monitoring personnel. An off-site monitoring location will be established if radiological conditions on site prohibit adequate monitoring.

Each ERF has radiation detection equipment.

The MRCA will establish decontamination areas as necessary. Decontamination facilities are available at various areas within the station. The EOF may be used for monitoring and decontamination if conditions prohibit on- site monitoring. Transportation to an off-site facility will be provided, as necessary. Monitoring and decontamination procedures are detailed in the Radiation Protection Manual (RPM). Documentation of personnel contamination surveys will be maintained. Any person suspected or known to have ingested radioactive material will receive bioassay examinations as specified by the RPM.

6.4.2 Use of On-site Protective Equipment and Supplies

Protective equipment and supplies are used to minimize external and internal radiological exposure and contamination of personnel entering the station. Detailed procedures on the use of protective equipment and supplies are referenced in Appendix D.

- 6.4.3 Contamination Control Measures
 - a. Detailed guidance for controlling radioactive contamination of personnel and equipment is provided in the RPM.
 - b. During accident conditions, the MRCA may approve conditional release of items from the RCA, in excess of RPM release limits. Special controls for release of this equipment will be instituted.
 - c. Personnel are advised not to consume on-site drinking water and food supplies during an accident, until sampling and analysis are completed.
 - d. For areas outside the station protected area, RMTs will be used to identify radiation control areas and security will be used to control access. Public access areas of the site will be controlled to off-site radiological criteria.
 - e. Radiological waste material will be controlled, stored and shipped in accordance with the RPM.
 - f. Off-site surface contamination and other radiological control criteria are detailed in the state and local RERP.
- 6.4.4 Personnel Radiation Dose Determination

Health Physics (HP) coverage is provided 24 hours per day to support normal Station operations. During accident conditions, HP technicians may accompany emergency workers, as needed, during RCA entries.

Emergency dosimetry (i.e., self-reading Pocket Ion Chamber dosimeters (PICs) or alarming dosimeters (also called Self Reading Dosimeters (SRDs)) and Dosimeters of Legal Record (DLRs) are used by the initial SERO responders, as necessary. Additional dosimetry is distributed by HP personnel and is issued to individuals, including off-site individuals arriving at the EOF. DLRs are available from and analyzed by the Dosimetry Laboratory. The individual integrated dose records are maintained by the HP Department. Exposure information is recorded from self-reading dosimeters and provides personnel exposure tracking until DLRs results become available. The DLRs results will be used as a permanent exposure record.

Permanent dosimetry will usually be read when it is determined that the emergency workers have received an exposure near their administrative limit or if an overexposure is suspected. All other dosimetry is read on a schedule established by the MRCA.

6.5 <u>Aid to Affected Personnel</u>

Provisions are made to assist personnel who are injured and/or have received high radiation exposures. First Aid qualified personnel provide on-site emergency medical services. First aid and decontamination facilities are available on-site and off-site. The following subsections describe measures to be used to provide necessary assistance.

6.5.1 Exposure Control Guidelines

In the event of an ALERT, SITE AREA EMERGENCY or GENERAL EMERGENCY, emergency worker exposure limits are automatically increased in accordance with EPA 400. This limit remains in effect until mission-specific limit upgrades are required and authorized by the appropriate emergency manager (refer to Table 6-1). The use of radioprotective Potassium Iodide (KI) will be evaluated for administration to on-site and off-site SERO personnel in accordance with emergency procedures. Exposures are commensurate with the significance of the objective and are held to the lowest levels that the emergency permits. In all situations, every reasonable effort is made to minimize exposure to emergency personnel.

Planned actions are carefully examined by weighing the risks and consequences of potential exposure and injury against the probability of success and the benefits to be gained from these actions.

Emergency worker exposure limits and KI issuance for State and local agency responders (i.e., National Guard, police) onsite are controlled by the State of CT or applicable agency.

6.5.2 Emergency Exposure Control Guidelines for Off-Site Personnel

If off-site emergency personnel are required during a nuclear incident to support combating fires, provide emergency first aid, or transport injured and/or contaminated injured to off-site medical treatment facilities, exposure limits as specified in Table 6-1 are applied. Appropriate dosimetry will be issued to all offsite responders in accordance with the RPM. Off-site medical facility staff personnel performing medical treatment on injured and/or contaminated injured persons shall control exposure in accordance with facility emergency procedures. Medical staff shall be issued appropriate dosimetry (i.e., DLR and SRD).

All dosimetry will be evaluated to determine and document the actual exposure received responding to the emergency.

For security-related events, offsite emergency responders such as the National Guard and State Police will report to the site with their own dosimetry. Dosimetry will be processed by a State contractor. Exposures received will be reported to the individuals and the station, as requested. Exposure control will be through the State of CT or local agency.

6.5.3 Decontamination

Radiological decontamination of personnel, supplies and equipment and waste disposal is conducted in accordance with the RPM, under direction of HP personnel.

Unit 2 and Unit 3 have decontamination facilities which may be used to decontaminate emergency response personnel.

The EOF is the principal decontamination facility during emergencies. A shower with holding tank and supplies for personnel decontamination are provided. If onsite areas are not usable because of inclement weather or continuing releases, the EOF may be used.

6.5.4 First Aid

First Aid qualified personnel are available to assist ill or injured personnel on-site 24 hours per day. If necessary, a physician may be requested to provide medical assistance on-site.

6.5.5 Medical Transportation

Injured or radioactively contaminated injured personnel requiring hospitalization are transported using local community ambulance services. The ambulance may be requested via dedicated or commercial telephone. The ambulance crews are trained to respond to radiological incidents. Personnel qualified in radiation protection are directed to report to the receiving hospital or accompany the injured, contaminated patients to the hospital. If necessary, the receiving hospital will be provided details of patients being transported. Station procedures provide detailed instructions for personnel responding to personnel injuries or contamination.

6.5.6 Medical Treatment

Arrangements for the primary care of injured, or radioactively contaminated injured personnel are made with Lawrence and Memorial Hospital in New London and Middlesex Hospital in Middletown. Communications will be by commercial telephone lines. The hospital staff is trained annually and the facility is equipped to treat contaminated injured patients. Contaminated wounds are treated and decontaminated as necessary by the hospital staff.

6.6 <u>Public Information</u>

At an Unusual Event Corporate Communications will determine the actions to take regarding notification of media in coordination with corporate management.

In an ALERT or higher public information emergency response personnel consist of the Nuclear News Manager (NNM), Corporate Support Director, Corporate External Affairs Manager, the Millstone Emergency Offsite Representative (MEOR), Corporate Executive Spokesperson (CES), and supporting staff. Public information will be coordinated between the station, the Hartford Armory, and Innsbrook. A variety of methods may be used to share information, including conference lines, Incident Report Forms, electronic or FAXed logs from the DSEO/EIS, and plant monitoring systems (OFIS).

The NNM reports to the MEOR at the Hartford Armory. The NNM interacts with the State and Federal media staff at the Joint Media Center and provides feedback including identified rumor trends to the ICSC. The Corporate External Affairs Manager reports to the Corporate Support Director at the ICSC. The Corporate External Affairs Manager develops and distributes news releases. The NNM may develop and distribute news releases if the Corporate External Affairs Manager is not available. The Corporate Support Director approves news releases. The Millstone Emergency Offsite Representative represents the licensee in communications with state decision makers at the SEOC and represents Dominion Energy in media briefs. The MEOR may be relieved by a CES at which time the MEOR assists the CES in an advisory role and manages the Dominion Energy staff at the Hartford Armory.

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Table 6-1

Emergency Exposure Limits

Category	TEDE
Annual Part 20	5.0 Rem ⁽¹⁾
Mission to protect valuable property	10.0 Rem ⁽²⁾
Mission to save a life or prevent/mitigate a severe accident	25.0 Rem ⁽³⁾
Voluntary mission to save a life or prevent/mitigate a severe accident	>25.0 Rem ⁽⁴⁾

NOTES:

- (1) Automatic exposure up to 5 Rem is allowed in a declared emergency. Members of the SERO responding to on-site emergency response facilities are designated emergency workers subject to NRC 10 CFR 50.47(b).11 radiation exposure controls which are the EPA guidelines for on-site emergency workers.
- (2) In accordance with EPA 400, emergency workers can be authorized for an exposure up to 10 Rem TEDE for operations necessary to protect valuable property.
- (3) Depending on station radiological conditions, authorized emergency workers may receive exposures up to a job/mission-specific designated limit, not to exceed 25 Rem TEDE.
- (4) Exposures above 25 Rem may be received for life saving activities on a volunteer basis and with full awareness of the risk involved.
- It is recognized by NRC and EPA that an accident involving significant radiation exposure is a low probability occurrence. An exposure level below 25 Rem is not considered to be life-threatening and will occur once in a lifetime. ALARA principles will be applied when possible.
- Dose received during an emergency is administratively tracked/controlled in accordance with 10 CFR 20 requirements following termination of the event.
- Total Effective Dose Equivalent is defined as part of the station health physics program.

Emergency Facilities and Equipment

This section identifies, describes, and gives the locations of emergency operation centers, support centers, communication systems, and first aid and medical facilities. Diagrams of the station emergency response facilities (ERFs) are provided in Appendix F. Locations of the onsite emergency response facilities (ERFs) are indicated in Table 7-1. The various facilities and equipment are controlled and surveilled, using MP-26-EPA-FAP05, "Emergency Planning Facility Manual," and MP-26-EPA-FAP01, "Management Program for Maintaining Emergency Preparedness." These documents provide detailed lists of equipment and schedules for conduct of facility/equipment surveillance. Equipment inspection and inventories are conducted quarterly or after known or suspected use of equipment are completed at specified intervals and during activation of the emergency response organization.

7.1 <u>Control Room</u>

7.

The Control Room is the primary facility where conditions of the plant are monitored, controlled and corrective actions are taken to mitigate any abnormal conditions. The Unit 1 Central Monitoring Station (CMS) houses one control station in "monitor mode" only (can be reconfigured to the control mode). No control functions are available in the "monitor mode." The Unit 2 control room contains a Programmable Logic Controller (PLC) and one control station (SM's work station) and two monitors which provide all control and monitoring functions remotely. Both locations provide indications and alarms for Unit 1.

The Control Room provides the main communications link between the Station and the other ERFs concerning system problems as well as long-term and short-term corrective actions. The Control Room is the primary operations center during events classified as UNUSUAL EVENT, and prior to the activation of the other ERFs for ALERT, SITE AREA EMERGENCY, and GENERAL EMERGENCY classifications. The SM/CRDSEO can initiate and coordinate appropriate procedures from the Control Room until additional assistance is available.

Emergency lighting, power, ventilation systems, and shielding enable operators to remain in the Control Room to ensure the station can be maintained in a safe condition. In addition, the operators are able to evaluate station conditions and relay pertinent information and data to appropriate emergency facilities, personnel, and agencies during all emergencies. To ensure that operating shift and other personnel can remain selfsufficient, portable radiation monitors, respiratory equipment, portable lighting, and alternate communication systems are maintained in the Control Room.

The Unit 2 and Unit 3 control rooms use the Off-site Facilities Information System (OFIS) as the primary data communications link to the ERFs. In addition, the Unit 2 and Unit 3 Control Rooms have Safety Parameter Display System (SPDS) terminals.

The Unit 2 control room contains one SM's work station and two monitors which provide indications and alarms for various parameters applicable to Unit 1's decommissioned condition, including the Spent Fuel Pool Island.

7.1.1 Normal Operations

The Control Room is the on-site location from which the nuclear power plant is operated. For Unit 2 and Unit 3, the control room contains the instrumentation, controls, and displays, as applicable to the unit, for:

- Reactor coolant and Auxiliary systems
- Balance of Plant and Nuclear Steam Supply systems
- Electrical systems
- Safety systems (including engineered safety features), and
- Accident monitoring systems

The Unit 2 control room is the on-site location from which the defueled plant is monitored and controlled. It contains instrumentation or displays for the Spent Fuel Pool, Balance of Plant, and Accident Monitoring Systems. If the Unit 2 control station console should become inoperable, the Unit 1 CMS may be used for control and monitoring.

7.1.2 Alert and Notification

The Unit 2 and Unit 3 control rooms are equipped with an ENRS terminal from which personnel transmit notification messages. State and local emergency response personnel acknowledge the notification.

7.1.3 Communications

In addition to regular direct-dial telephone lines and on-site extensions, the Unit 2 and Unit 3 Control Rooms are equipped with reliable emergency communication systems (dedicated telephone lines, satellite phones, and radios) necessary to alert station and other essential licensee, state, and local community personnel and maintain communications with the station ERFs throughout an emergency. The Unit 2 and Unit 3 Control Rooms, the TSC, and the EOF have a dedicated telephone system to communicate with the NRC.

7.2 Emergency Operations Facility

7.2.1 Function

The EOF serves as a support facility for the management of the overall site emergency response, the coordination of radiological and environmental assessments, and determination of recommended public protective actions. It is the primary communication center and contains appropriate communication links to on-site data sources and off-site organizations.

Emergency radiological monitoring and decontamination equipment and supplies, protective clothing, and respiratory protective devices are also located in the EOF. In addition, the EOF contains a facility for limited analyses of radiological data.

The EOF is activated during events classified as ALERT, SITE AREA EMERGENCY, or GENERAL EMERGENCY and is the primary interface between the SERO and off-site agencies.

If an event occurs which prohibits access to the station per NRC Letter A15638, commitment number B18617-10, designated locations are available for EOF SERO response. Full activation may not be possible until the threat conditions have been resolved.

7.2.2 Location

The EOF is located approximately 15 miles north of the station protected area (refer to Appendix F, Figure F-2).

An alternate EOF is located in the Unit 3 Control Room (office area in the back of the Control Room) for key positions.

7.2.3 Structure and Habitability

The EOF is designed for continuous operation during an emergency. It is a rectangular, one-level, above-ground structure. It provides approximately $16,000 \text{ ft}^2$ of working space. The EOF is a fenced in facility with a key card security system for entry. It has an Emergency Generator to provide backup AC power.

7.2.4 Layout

The EOF functional areas are indicated in Appendix F, Figure F-2.

7.2.5 Communications

The EOF is the primary communications center at the station during an emergency. The EOF is provided with communications to the control rooms, TSC/OSC, SEOC, Joint Media Center, Innsbrook Corporate Support Center (ICSC), and NRC.

An ENRS terminal is available as well as radios, dedicated telephones, satellite phones, and facsimile machines.

7.2.6 Power Supplies

Normal power is provided to the EOF from the power grid. Emergency power is provided automatically by an emergency generator, capable of meeting all EOF power requirements.

7.2.7 Technical Data and Data Systems

The EOF receives plant operational data via the Offsite Facility Information System (OFIS) and direct voice communications with other ERFs. Facsimile machines provide hardcopy communications between ERFs.

7.2.8 Records Availability and Management

An administratively controlled library of station and plant specific drawings and procedures is maintained in the EOF. This information is stored at the EOF in hard copy or electronic form.

7.3 <u>Technical Support Center/Operational Support Center</u>

7.3.1 Function

The TSC provides technical support to plant operations personnel in the Control Room, OSC (co-located with the TSC) and EOF during an emergency. The TSC is activated within 60 minutes of notification of an ALERT or higher event.

TSC personnel are under the direction of the ADTS. The MTSC will use communication networks, data system networks, and available documents to analyze the plant behavior throughout the incident. TSC personnel will also research, collect, and interpret plant parameter data, perform detailed calculations, trend data, determine probable consequences of proposed plant corrective actions and provide engineering recommendations to mitigate plant system degradation. The MTSC communicates with the MCRO to evaluate plant conditions, and recommends corrective action via the ADTS.

If an event occurs which prohibits staffing the TSC (i.e., Security threat), designated locations are available for TSC SERO response. Full TSC activation may not be possible until the threat conditions have been resolved.

The ADTS, located in the TSC, provides guidance and direction to the control room operating personnel. The MTSC coordinates with the MOSC to brief emergency repair teams.

The NRC dispatches representatives to the TSC to monitor plant conditions and station emergency technical support activities, and to maintain communications with the NRC senior representative on site.

7.3.2 Location

The TSC is located inside the protected area, adjacent to the west side of the Unit 3 control building. An alternate TSC is located in the Emergency Operations Facility.

7.3.3 Structure and Habitability

The TSC/OSC is a 2000-ft² below-ground facility with one-foot thick (minimum) exterior walls and ceiling. It was designed and built in accordance with the Connecticut State Building Code. It is able to withstand the most adverse conditions reasonably expected during the design life of the station.

A dose consequence study for the TSC/OSC revealed that the calculated 30-day integrated doses to personnel in the TSC/OSC following a design basis accident at any of the three units are within 10CFR50 Appendix A, General Design Criteria 19 guidelines and the NRC Standard Review Plan for Control Room Habitability:

	<u>Limit</u>
Thyroid	30 Rem
Whole body gamma	5 Rem
Beta skin dose	30 Rem

The HVAC system is rated for 2,000 CFM and located in the TSC/OSC penthouse, which is above ground level. The facility receives an isolation signal initiating HVAC operation from the Unit 3 control building isolation (CBI) signal. This system is designed to maintain habitability for facility occupants. Specific occupancy criteria is included in Section 9.4.13 of the Unit 3 Final Safety Analysis Report (FSAR).

7.3.4 Layout

Work centers exist to enable OSC and TSC personnel to monitor plant data on the OFIS, SPDS terminals, and provide technical assistance. The critical safety functions may be continuously monitored on provided SPDS displays.

The NRC work area provides a space for the NRC to establish local area network communications and monitor OSC and TSC activities. NRC dedicated telephone system connections are provided in addition to site telephone access.

7.3.5 Communications

The OSC and TSC are provided with reliable communications to the control rooms and EOF. A facsimile machine is provided for hard copy data transmission.

7.3.6 Power Supplies

The TSC/OSC is powered from the Unit 3 normal power bus. The Security system emergency diesel generator provides reliable backup power to meet all TSC requirements.

7.3.7 Technical Data and Data Systems

The TSC will initially receive plant operational data via the Unit 2 or Unit 3 SPDS and/or OFIS system and telephone communications between the TSC and the control room. OFIS automatically records plant system variables and provides history, data trending and graphic print capability to the ERFs.

7.3.8 Records Availability

An administratively controlled library of station and plant specific drawings and procedures is maintained in the TSC. This information is stored in hard copy or electronic form.

7.4 Operational Support Center (OSC) and OSC Assembly Area

7.4.1 Function

The OSC is a protected area facility, co-located within the same structure as the TSC. Emergency response personnel will assemble in the OSC during an emergency to provide support to the affected control room.

The OSC Assembly Area provides a staging area for emergency teams being dispatched during accident conditions, as well as space for additional SERO personnel outside the TSC/OSC.

7.4.2 Location and Size

The OSC is located within the TSC/OSC facility adjacent to the west side of the Unit 3 control building. The OSC is approximately 23 feet by 26 feet.

The OSC Assembly Area accommodates support personnel not located in the TSC/OSC facility.

The OSC Assembly Area is located in the Technical Support Building (B475), Conference Room C-102, which is approximately 50 yards west of the TSC/OSC (see Figure F-3).
7.4.3 Structure and Habitability

The OSC has the same habitability as the TSC.

The OSC Assembly Area has no specific habitability criteria.

7.4.4 Communications

The MOSC will maintain communications with the OSC Assembly Area using normal or dedicated telephones in the OSC. The MOSC will directly communicate with the ADTS.

7.4.5 Emergency Equipment

In order to support the OSC function, the following emergency equipment is located in OSC storage locations:

- Radiation Monitoring Team Kit
- Portable Radios
- Protective Clothing
- Respiratory Protection

Access to additional HP and maintenance equipment is readily available to obtain specific materials required to perform OSC functions.

The OSC AA contains the following equipment:

- Dosimetry issue equipment
- Portable radios
- Hotlines and fax machines

7.5 State Emergency Operations Center

7.5.1 Function

The State Emergency Operations Center (SEOC) is activated by the State of Connecticut. Overall direction for response to major emergencies in Connecticut is coordinated by Unified Command (UC) in the SEOC. Participants in the UC include the Governor, various state department leads, federal agencies, and for Millstone emergencies, Millstone/Dominion Energy SERO staff. In this facility, SERO staff advises state officials regarding plant conditions, plant response activities, protective actions, public information messaging and state resources needed to support the response. SEOC SERO staff participates in communications with local town EOCs to provide plant information. SERO staff work with CT DEEP staff in the SEOC supporting independent plant condition analysis and dose assessment activities.

The Joint Media Center is located within this facility. It is activated by the DEMHS and Governor's press staff as the principal media contact point for the licensee, the state and local communities during a Site Area Emergency, General Emergency, or other incidents that may generate high media interest. State and licensee plans do not include use of station facilities for a media center; however space is available for media briefings or conferences at the site.

7.5.2 Location

The SEOC is located in the Connecticut State Armory in Hartford Connecticut.

7.5.3 Structure and Habitability

The State of Connecticut, DEMHS maintains this facility available 24/7 as an all hazards emergency response facility.

7.5.4 Layout

Space in the SEOC includes the UC center, work spaces for various agencies and non-governmental organizations including Millstone SERO staff, meeting areas, kitchen facilities, restrooms, and the Joint Media Center. Space is provided to allow SERO staff to maintain contact with other ERFs.

7.5.5 Communications

SERO staff at the SEOC communicates with the EOF and the ICSC using commercial telephone lines, email and/or FAX. OFIS monitoring capability is provided for SERO and DEEP staff. Millstone maintains a direct line for the DEEP to receive Protective Action Recommendations (PARs) from the DSEO, and a direct line for the DEEP to contact the DEEP representative in the EOF.

7.5.6 Technical Data and Data Systems

The SEOC receives plant operational data via the Offsite Facility Information System (OFIS) and direct communication with other ERFs.

7.5.7 Records Availability and Management

Procedures, job aids and presentation materials are stored at the SEOC for use by Millstone SERO staff.

7.6 Emergency Equipment

Emergency equipment is stored at various on-site locations, including the control rooms, TSC/OSC, access points and the EOF.

For a representative list of emergency equipment, see Appendix E. Emergency equipment is maintained in accordance with station procedures including MP-26-EPA-FAP01 and MP-26-EPA-FAP05.

7.6.1 Emergency Response Data System (ERDS)

The ERDS, established in accordance with regulatory guidance, is provided via electronic data transfer. An ERDS link is initiated within an hour of an ALERT or higher emergency classification. An ERDS link is not provided for Unit 1.

7.7 <u>Security Posts</u>

The security posts that are established and used during an emergency are addressed in general terms to avoid disclosing safeguards information. More specific information is contained in the proprietary Security Plan and procedures.

The Station Security Department primary objectives during an emergency are to maintain adequate station security, facilitate the precautionary dismissal and evacuation of the protected area and outlying areas, and assist with emergency communications, as necessary.

Either the Central or Secondary Alarm Station will become the Security Command Console if an emergency occurs and will function as an on-site emergency communications center during the first 60 minutes while the SERO is being activated. Security computer proximity card reader units are used to perform accountability for the protected area. Accountability can be performed via alternate method if proximity card reader units are inoperable.

7.8 <u>Alternate Locations</u>

- 7.8.1 An alternate location is designated for off-site officials who are unable to reach the EOF due to radiological or environmental conditions near the EOF. The Alternate Location is physically located at the SEOC (Armory) in Hartford, Connecticut. The alternate location has communications capability with the site emergency response facilities (i.e., EOF, TSC, control room). There is enough space to accommodate off-site officials requiring access to site emergency managers.
- 7.8.2 The EOF in Norwich, CT, functions as a staging area for augmentation of emergency response staff if the site is under threat of, or experiencing, hostile action. This location has the capability to communicate with the control rooms and plant security.

7.9 <u>Communication Systems</u>

The communication links between emergency response centers and off-site agencies are shown in Figures 7-1a through 7-1c. These systems provide reliable communications and consist of a combination of the station PA system, emergency alarm, intraplant telephones, computer terminals, dedicated hotlines, commercial and utility (tie-line) telephones, satellite phones, facsimile machines, and two-way radios including utility, State Police, Waterford Police, and ISO New England radio communications. In addition, the Station has NRC dedicated telephone system lines installed in the Unit 2 and Unit 3 control rooms, EOF and TSC.

Two-way radio communications are used to maintain communication between the EOF and RMTs. Police and utility radio communication are used by the Control Room in the event of the failure of the telephone system for off-site communications. Backup power is maintained for selected communication links in the protected area and the EOF.

Ambulances are equipped with radios and can communicate with the hospital. Normal communication between the station and off-site medical facilities will be over commercial telephone. There are also hotline telephones between the Central Alarm Station and TSC/OSC to the State Police, Waterford Police / Waterford Emergency Communications Center.

The states of New York and Rhode Island are within the 50-mile ingestion pathway EPZ and are contacted through the Connecticut DEMHS and State Police as described in the State RERP. Fishers Island and Plum Island, New York, are within the plume exposure EPZ and are notified of emergency events via ENRS.

7.10 Assessment Facilities

Appropriate on-site and off-site monitoring instruments and laboratory facilities needed to analyze an accident are available 24-hours per day and are listed in Appendix H, Tables H-1 and H-2. The MRDA and MRCA will coordinate the collection of sample media by the Radiological Monitoring Teams (RMTs). The RMTs will return samples to the EOF for analysis when directed. Appendix B provides letters of agreement with private laboratory facilities specified in Table H-2. Post-accident environmental samples are collected by responsible state agencies and analyzed by the State Health Department laboratory. The licensee will assist the State of Connecticut in the collection of environmental samples under direction and control of DEEP, as requested.

7.11 First Aid and Medical Facilities

24-hour per day first aid services are provided by first aid qualified personnel, as a minimum, with multi-media first aid training. First aid supplies and equipment are stored in various locations throughout the station. The Site Medical Facility is also available during selected hours, which may provide equipment and personnel to assist in medical emergencies.

7.12 Damage Control Equipment

Damage control equipment consisting of fire hydrants, fire hose stations, fire extinguishers, and portable lanterns are provided throughout the station for fire fighting. Self-contained breathing apparatus is located strategically throughout the station for fire fighting and entry into airborne radioactivity or toxic gas areas. Selected equipment spare parts are stored in the warehouse for emergency repairs. Tools and equipment required for equipment maintenance are available in the maintenance shops.

7.13 Meteorological Data Acquisition

The Millstone site has a primary meteorological installation consisting of a 450-foot instrumented tower, a climate-controlled shelter, and a computerized data acquisition system. Wind speed and direction are measured at four different levels: 33, 142, 374, and 447 feet. Vertical temperature difference is measured at 142, 374, and 447 foot levels: the vertical interval in all three cases is measured from a baseline height of 33 feet. The critical parameters of wind speed, wind direction, and a measure of atmospheric stability are continuously available in the Unit 2 and Unit 3 Control Rooms and at the base of the meteorological tower. Other non-critical meteorological parameters are also measured.

The site has a backup meteorological monitoring system located near the training facility. The system consists of a 10-meter instrumented mast, a climate-controlled shelter, and a backup computerized data acquisition system. Additional information may be obtained from a weather service organization, listed in Appendix B.

The primary source of meteorological data used by the meteorological team is the EDAN system, an electronic data acquisition network. If EDAN is inoperative, the critical data may be obtained over the telephone from operators reading Unit 3 Plant Process Computer data. If the primary meteorological tower instruments are not operating properly, the backup meteorological installation located near the training building may be used. If both on-site systems are inoperative, arrangements have been made to obtain information from the assisting weather service organization.

7.14 Innsbrook Corporate Support Center (ICSC)

The ICSC located near Richmond, VA, is required to be activated to provide support during an ALERT or higher event at Millstone Power Station. When activated, the function of the ICSC includes public information and may include logistical support in the event of an emergency at Millstone.

<u>Table 7-1</u>

Locations Of Emergency Response Centers

<u>On-site</u>

- 1. Control Room
- 2. OSC Assembly Area (OSC AA)
- 3. Technical Support Center/Operational Support Center (TSC/OSC)
- 4. Alternate TSC
- 5. Alternate EOF

Off-site

- 1. Emergency Operations Facility
- 2. Assembly Area
- 3. Joint Media Center
- 4. State Emergency Operations Center
- 5. Local Community Emergency Operations Centers
- 6. Alternate Location
- 7. Remote Mustering Area
- 8. Offsite Monitoring Location

Corporate

1. Innsbrook Corporate Support Center (ICSC)

Location

Unit 2 and 3 Control Room

Cafeteria, Bldg 475

Adjacent to and below Unit 3 Control Bldg.

EOF

Unit 3 Control Room (office area in the back of the Control Room)

Location

18 Stott Avenue, Norwich, CT

Simulator Foyer in the Training Building

Connecticut State Armory (Hartford)

Connecticut State Armory (Hartford)

Refer to the Local Community Radiological Emergency Response Procedures

State EOC (Armory) Hartford, CT

EOF, Norwich, CT

EOF, Norwich, CT

Location

Richmond, VA (Innsbrook)

Figure 7-1a

Notification of Emergency Response Organizations



*Located offsite

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NRC Emergency Notification System (ENS) and Health Physics Network (HPN) Millstone Station





*Located offsite

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Station management is responsible for the staffing of the SERO and approval of station emergency plan procedures.

The Manager, Emergency Preparedness is responsible for the following:

- Maintenance and readiness of the on-site emergency response facilities and equipment.
- Maintenance and development of the Station Emergency Plan and implementing procedures (Appendix D).
- Preparation and conduct of emergency plan drills and exercises.
- Training off-site emergency response personnel.
- Conducting and providing input to SERO training.
- Scheduling, coordinating, and conducting SERO training using EP Personnel.
- Coordination of licensee, state and local emergency plans and procedures.
- Assisting station management to ensure effective emergency plan implementation.
- Collecting and reviewing additional EP-related information such as severe accident management research, and NRC regulations and industry research, for incorporation into the EP Program.

The Manager, Emergency Preparedness is assisted by the EPD staff. Appropriate EPD staff training is ensured by attendance at NRC/FEMA seminars/meetings, academic institutions, industry conferences/meetings, on-the-job training, and supervised work assignments. Administration and management of emergency preparedness programs is detailed in Emergency Preparedness implementing and administrative procedure.

The Manager, Nuclear Training, is responsible for scheduling, coordinating, and conducting SERO training using Nuclear Training Department personnel. The Manager, Nuclear Training, will obtain assistance as necessary from discipline managers in the conduct of discipline-specific training. In addition, the Manager, Nuclear Training, is responsible for supporting chemistry drills and health physics drills. The Supervisor Nuclear Training is responsible for conducting required fire drills.

8.1 <u>Training</u>

8.

8.1.1 SERO Training

The goal of the Emergency Plan Training Program is to provide SERO personnel with the additional skills and knowledge necessary for them to effectively respond to an emergency at the station. The SERO Training Program provides both initial and requalification training on an annual, calendar year basis. Appendix K provides a summary listing of training topics for SERO personnel. Section 5, Table 5-1 lists the topics for personnel by SERO position. Detailed training lesson plans and administrative requirements for SERO personnel are contained in TR-AA-TPG-2400 and MP-26-EPA-FAP01.

8.1.2 Off-Site Emergency Response Training

Training for local off-site emergency response personnel, such as local fire, police, mutual aid responders and emergency management officials is offered annually. Training for off-site agencies consists of radiation protection, emergency classification, notification, emergency plan overview and general plant access information. Local ambulance staff are trained annually in plant access and the medical treatment of contaminated, injured patients. Hospital emergency room staff are trained annually in medical treatment of contaminated patients.

State personnel, representing agencies at the State EOC, are trained in specific procedures through participation in periodic drills. In addition, responsible state agencies are trained in emergency classification. Field monitoring and sampling team personnel are trained annually in radiation protection, monitoring and ingestion sampling procedures.

Host community emergency organizations are trained in radiation monitoring and protection, activation and operation of evacuee reception centers.

8.1.3 Additional Emergency Preparedness Training

a. <u>Plant Access Training (PAT)</u>

Employees obtaining unescorted access to the station for the first time receive general instruction on the Emergency Plan as part of their plant access training. This includes a review of the purpose of emergency planning, the emergency classification system, and the precautionary dismissal, and evacuation. This information is reviewed annually as part of the employee's Plant Access Training Program. Company and contractor personnel obtaining unescorted access to the station receive general instruction on the Emergency Plan as part of their plant access training.

b. <u>Fire Brigade Training</u>

The Fire Brigade is composed of designated station firefighting personnel. Initial and annual refresher training is provided to Fire Brigade Members in accordance with training department procedures.

c. <u>First Aid Teams</u>

First Aid Teams are provided Medic First Aid training program: "Basic Plus – CPR, AED and First Aid for Adults" or equivalent at a minimum.

8.2 Tests, Drills, and Exercises

Drills and exercises are conducted to ensure that the participants are familiar with their emergency duties and responsibilities; to verify the adequacy of and methods used in station emergency plan procedures and other emergency procedures; and to verify emergency equipment function.

Drills are conducted for SERO personnel at intervals throughout the year. The drills may be combined with classroom refresher training for each SERO position. Drills may be conducted as an evaluated event or a training drill, where controllers provide immediate correction of erroneous performance. Guidance for the conduct of drills and exercises is provided in regulatory guides published by NRC and FEMA. Detailed methodology for the structure, administration and conduct of drills is contained in EP-AA-400, "Drill and Exercise Program." Drill comments are also tracked and dispositioned using the station Corrective Action process.

- 8.2.1 Off-Site and On-Site Testing of the Notification, Communication, and Alerting Systems
 - a. <u>Communication Tests</u>

Communication tests shall include an aspect of understanding message content as well as testing the equipment.

- The site emergency alarms and emergency responder notification systems tests are conducted monthly.
- Communications with specific state and local officials within the plume exposure pathway EPZ are tested at least monthly.
- Telephone numbers in emergency plan procedures are reviewed quarterly and corrected as necessary.
- The NRC dedicated telephone systems are tested monthly.
- Communications capability between the RMTs and emergency centers are tested quarterly and during drills or exercises.
- Communications with federal emergency response organizations and states within the ingestion pathway EPZ are tested quarterly by the State DEMHS.
- The ERDS system for Unit-2 and Unit-3 is tested quarterly.

Off-site Public Alerting System Testing

The testing of the Public Alerting System (sirens) and communications is detailed in the State and local RERPs. Silent tests may be performed during the full or partial-participation exercise. Silent tests, system polling, individual siren growls, and full load checks are described in MP-26-EPA-FAP09, "Alert Notification System Test and Maintenance," and are performed at varying frequencies. Records on siren availability are kept by the Emergency Preparedness Department and summaries are forwarded to the State DEMHS on an annual basis.

8.2.2 Additional Tests, Drills, and Exercises

The schedule for conducting drills and exercises is as follows:

a. <u>Fire Drills</u>

b.

Fire drills will be conducted in accordance with CM-AA-FPA-100 (Fire Protection/Appendix R (Fire Safe Shutdown) Program). The Training Department is responsible for the review and approval of fire drill scenarios. Fire drill discrepancies shall be entered into the Corrective Action Program (CAP) and will be assigned to the appropriate department to evaluate and to take corrective actions. The Site Fire Marshall shall also review and disposition, as necessary, comments from fire drill critiques.

b. <u>Medical Emergency Drills</u>

The Manager, Emergency Preparedness is responsible for conducting annual medical drills. Arrangements for training and drills are made through the Lawrence and Memorial Hospital or Middlesex Hospital Emergency Departments, as applicable. A medical exercise, involving simulated contaminated and injured worker(s), local ambulance service personnel, station security, health physics and hospital emergency staff is conducted annually.

c. <u>Radiological Monitoring Drills</u>

Environmental radiological monitoring drills (on-site and off-site) are conducted annually and can be conducted as part of the annual exercise. These drills include collecting and analyzing environmental samples. Communications and record-keeping procedures are also checked during these drills.

d. Health Physics Drills

Health physics drills are conducted semi-annually and involve response to and analyses of simulated elevated airborne and liquid samples and direct radiation measurements.

Emergency Plan Training Drills

The Emergency Preparedness Department is responsible for scheduling two emergency plan training drills annually for Unit 2 and Unit 3, and one for Unit 1. These drills generally include functional areas identified in Table 5-1. (These include the annual rehearsal and exercise.) The Emergency Preparedness Department will also conduct drills involving severe accident management implementation and terrorist based events at intervals established by the 8-year schedule.

f. <u>Exercises</u>

e.

Emergency Preparedness exercises are conducted in accordance with 10 CFR 50.47(b) and 10 CFR 50 Appendix E requirements.

The Emergency Preparedness Department is responsible for coordinating exercises to test station, state(s), and local emergency plans. Station procedures ensure 8-year exercise cycle objectives are met.

Millstone Power Station shall exercise the emergency plan annually.

Millstone Power Station shall exercise the emergency plan with off-site authorities (state and local government) every two (2) years, with full or partial-participation by state and local governments within the plume exposure pathway EPZ. The level of participation shall be as follows:

- The State of Connecticut shall at least partially participate in each off-site exercise at Millstone Power Station.
- The State of Connecticut shall fully participate in at least one offsite exercise every two (2) years.
- Partial participation by a local government is acceptable, with FEMA approval, when the local government is fully participating in a biennial exercise at another site, or a combination of the following enable demonstration of all exercise objectives:
 - 1) FEMA credits actual incident response for required objectives.
 - 2) The local government cannot demonstrate exercise objectives due to conflicting schedules <u>and</u> required objectives can be demonstrated out-of-sequence with the main exercise.

- 3) Compensatory measures can be demonstrated by another entity.
 - The states of Rhode Island, Connecticut and New York, which are responsible for emergency responses within the 50 mile ingestion exposure pathway EPZ, shall exercise their plans and preparedness related to ingestion exposure pathway measures at least once every 8 years.
 - The licensee shall enable any state or local government located within the plume exposure pathway EPZ to participate in an annual exercise when requested by such state or local governments.
 - The licensee shall make provisions to conduct an off-hours exercise between the hours of 6:00 p.m. and 4:00 a.m. every 8 years.

Remedial exercises will be required if the plan is not satisfactorily tested during the biennial exercise, such that NRC, in consultation with FEMA, cannot find reasonable assurance that adequate protective measures can be taken in the event of a radiological emergency. The extent of state and local participation in remedial exercises must be sufficient to show that appropriate corrective measures have been taken regarding planning elements not properly demonstrated during the previous exercise.

g. <u>Post-Exercise Critique</u>

An in-house, post-exercise critique will be conducted.

- Exercise evaluators will discuss emergency response observations during the critique. The exercise observations and comments shall be compiled into a formal exercise evaluation report by the Emergency Preparedness Department.
- The Emergency Preparedness Department is responsible for tracking corrective actions for exercise critique comments.
- The Emergency Preparedness Department will evaluate comments, assign responsibilities and track the resolution process. Station management will ensure corrective actions are completed as necessary.

An off-site post-exercise critique will be scheduled at the conclusion of each exercise by FEMA to allow official observers and evaluators from federal agencies and state and local communities to evaluate the performance of the various emergency response organizations. The critique will be chaired by FEMA. Additionally, the critique is open to the public and news media.

8.3 Administration of Station Emergency Plan and Procedures

The Station Emergency Plan contains elements of planning that involve assistance and coordination of governmental agencies and intra-company groups. In order to achieve and maintain the most efficient course of emergency action, liaison is continuously maintained with state and local agencies responsible for public safety.

The Station Emergency Plan and letters of agreement are reviewed on an annual basis and updated as appropriate. Changes to the Emergency Preparedness Program are evaluated in accordance with EP-AA-101, 10 CFR 50.54(Q) Change Evaluation, for 10 CFR 50.54(q) prior to implementation. Changes to the Station Emergency Plan and implementing procedures are undertaken in accordance with station administrative procedures and subject to evaluation under 10 CFR 50.54(q).

Evacuation time estimates (ETEs) are developed within 365 days of when U.S. Census Bureau decennial data becomes available. ETEs are reviewed against estimated EPZ permanent resident population changes at least once a year and within 365 days of the date of the previous ETE or its most recent review. Increases of ETEs greater than the limits detailed in 10 CFR 50 Appendix E require the ETE analysis be updated. The decennial ETE and its updates are submitted to NRC as required by 10 CFR 50 Appendix E.

10 CFR 50.54(t) reviews of the Emergency Preparedness Program are performed at the frequency required by 10 CFR 50.54(t)(1) by the licensee oversight group or an industry peer evaluation team. The reviews include the Emergency Plan, implementing procedures and practices, training, readiness testing, equipment, an evaluation of the adequacy of interfaces with state and local government and the conduct of drills and exercises. The reviewer completes a written report that details the items reviewed and corrective actions to be taken. The report is sent to the Manager, Emergency Preparedness and to corporate and station management. The Manager, Emergency Preparedness is responsible for evaluating and correcting report findings. Documentation of report findings and corrective actions shall be maintained for a period of no less than five years. Applicable portions of the report will also be made available to federal, state, and local organizations. The Chairperson of the Management Safety Review Committee (MSRC) receives the report. Unresolved findings from the review are identified to the oversight group management in writing. Review items are not closed until final corrective actions are taken.

8.4 <u>Public Information Programs</u>

Specific emergency instructions are provided primarily via a booklet mailed annually to residences, commercial establishments and emergency management officials within the plume EPZ. The emergency information booklet includes a description of the Public Alerting System, a list of Emergency Alert System stations, sheltering and evacuation checklists, a map of evacuation routes to Host Community Reception Centers, and detailed information about radiation and its effects. The booklet also includes contact points and references to various emergency planning websites. This booklet is made available to the general public on the State's DEMHS website.

A brochure for annual distribution and posting at State designated public areas within the EPZ serves the transient population, in addition to selected telephone directories that contain abbreviated emergency public information. Special needs mailers with a preposted return form are sent directly to EPZ residents for voluntary registration with their local emergency officials.

The State of Connecticut DEMHS is provided with information for posting or distribution, as appropriate, at selected public areas within the EPZ.

Other on-going elements of the Public Information program include:

- 1) Educational Outreach Programs. These programs are conducted out of the Nuclear Training Center. The Outreach Program provides public informational and educational activities throughout the EPZ.
- 2) Speakers comprising a variety of company employees from many disciplines and operational functions, provides information on nuclear power to numerous institutions, civic and professional groups, and other organizations.

8.5 Media Information Program

A media information program is offered annually to acquaint the news media with emergency plans, information concerning radiation, and points of contact for release of public information in an emergency.

A media manual, developed to meet the needs of the news media, contains plant specific information and general information concerning emergency planning, nuclear power and radiation. The manual is distributed to the local media and is available for issue at the Joint Media Center at the time of an emergency.

9. Recovery

9.1 <u>Recovery Phase</u>

The Organization for Recovery Operations (ORO) is activated by the DSEO.

The recovery phase occurs after the plant is brought to a long-term stable state. When this occurs the emergency organization will no longer be required to take corrective or mitigating actions to respond to the accident.

If normal resources are adequate to recover the plant to normal operations, the emergency organization is disbanded and the event is terminated. If the unit is damaged and the recovery actions require extensive resources and/or will last from months to years, the ORO will replace the SERO. A Director of Recovery Operations will be designated to convene an event review meeting and investigate the cause.

Recovery actions are described in emergency plan procedures.

9.2 <u>Recovery Organization</u>

The ORO is illustrated in Figure 9-1.

9.2.1 Site Vice President – Millstone

The Site Vice President – Millstone is responsible for coordinating the station recovery operations.

9.2.2 Director of Recovery Operations (DRO)

The Director of Recovery Operations (DRO) is responsible for overall direction of recovery operations and reports to the Site Vice President - Millstone.

The Director of Recovery Operations (DRO), as well as those managers reporting directly to him, are chosen by station management. They possess competent managerial skills and are experienced in their areas of responsibility.

9.2.3 Manager of Technical Support

The Manager of Technical Support is responsible for the following:

- Providing necessary technical support services.
- Analyzing core parameters and other technical information.
- Performing reactor systems analysis.
- Providing a central facility for collecting, retaining, and retrieving data.
- Providing post accident data analysis timeline for the accident.

- Developing recovery procedures.
- Developing and approving proposed modifications to procedures, systems and equipment.
- Determining recovery activities needed to be documented in accordance with the Quality Assurance (QA) program.
- 9.2.4 Manager of Plant Operations

Manager of Plant Operations is responsible for the following:

- Supervising and maintaining a station support staff during the recovery operation.
- Maintaining an effective station security program.
- Implementing maintenance and repair operations with station staff.
- Coordinating Facility Safety Review Committee (FSRC) activities as necessary.
- 9.2.5 Manager of Radiation Control/Radwaste

Manager of Radiation Control/Radwaste is responsible for the following:

- Assisting the State DEEP as necessary in off-site recovery phase sampling, survey measurements and data analysis to determine re-entry and recovery actions for off-site areas.
- Developing and performing evaluations of health physics equipment and procedures for recovery operations.
- Performing special dosimetry evaluations or providing specialized dosimeters.
- Developing plans and procedures to sample, process, and control liquid, gaseous, and solid radioactive waste, and coordinating waste disposal activities.
- Maintaining an ALARA program.
- Developing decontamination plans.
- Assisting the State DEEP in determining total integrated population doses by using various inputs.

9.2.6 Manager of Engineering Systems

Manager of Engineering Systems is responsible for the following:

- Providing required engineering support services.
- Interface and consultation with engineering and technical experts, as needed.
- Acquisition and coordination of manpower and equipment to support repair activities.
- Acquisition of housing, office, and construction equipment to support recovery operations.
- Arranging for the purchase of legal and insurance assistance.
- Providing general administrative support.
- Scheduling and expediting recovery operations.
- Assisting the DRO in planning activities.
- Coordination of recovery staff meetings.
- Tabulating, expediting and closing out commitment lists in support of recovery operations.
- Establishing cost control procedures.
- 9.2.7 Advisory Support Staff

Advisory support staff personnel provide support to the DRO in various areas.

9.2.8 Corporate External Affairs Manager

The Corporate External Affairs Manager provides liaison with the media.

9.2.9 Licensing Department

The Licensing Department interfaces with the NRC and other regulatory agencies on licensing issues.

9.2.10 Millstone Representative in the SEOC and Joint Media Center

The Millstone Representative in the SEOC and Joint Media Center provides advisory support to state and local communities.



Recovery Organization



9-4

APPENDIX A

DEFINITIONS, ABBREVIATIONS AND ACRONYMS

<u>Appendix A</u>

This section provides definitions of commonly used terms that are applicable to this Emergency Plan.

DEFINITIONS

Absorbed Dose

The quantity of energy imparted from ionizing radiation per unit mass of tissue.

Alternate Location

A designated facility (SEOC [Armory]) where off-site officials can communicate with company officials if access to the EOF is impaired.

<u>Actions</u>

Assessment Actions

Those actions taken during or after an incident to obtain and process information that is necessary to make decisions to implement specific emergency measures.

Corrective Actions

Those emergency measures taken to improve or terminate an emergency situation.



Emergency Actions

Actions taken as a result of reaching an Emergency Action Level.

Protective Actions

An action taken to avoid or reduce a projected dose.

Recovery Actions

Actions taken after an emergency to restore the station to pre-emergency condition and decide on re-entry of the public affected areas.

Airborne Radioactivity

Any radioactive material dispersed in the air in the form of dusts, vapors, gases, etc.

<u>Area</u>

<u>Clean Area</u>

An area free of contamination or with levels of contamination below the specified limits.

<u>Appendix A</u>

Owner Controlled Area

The area within the site boundary including the protected area.

Protected Area

The area within the Millstone Power Station security fence.

Radiological Control Area

An area within the restricted area in which radioactive material is present and the potential exists for the spread of radioactive contamination. The area will be posted for the purpose of protecting individuals against undue risks from exposure to radiation and radioactive materials.

Background Radiation

Radiation arising from material other than the one directly under consideration such as from cosmic rays, the ground, the air, building materials, etc.

Barrier

One of the three fission product barriers: fuel clad, RCS pressure boundary and containment.

Barrier Based EALs

A table of symptoms defining the loss or potential loss of a barrier, e.g., the Barrier Reference Table. A combination of barrier losses defines an emergency classification level.

Central Monitoring Station (CMS)

The Unit 1 facility from which indications and alarms are monitored and control functions performed, if necessary.

Certified Fuel Handler

An individual who has qualified in accordance with an approved fuel handler training program.

Condition (also called initiating condition)

A description of a nuclear power plant event where either the potential exists for a radiological emergency, or such an emergency has occurred; e.g., loss of both batteries for greater than 15 minutes is a condition with a category of events titled Loss of Power.

Confinement Boundary

The sealed dry cask storage canister that provides the spent fuel cladding protection. The barrier between areas containing radioactive substances and the environment.

Contamination (Radioactive)

The deposition of radioactive material in any place where it is unwanted (e.g., on persons, products or equipment).

Control Room

The Control Room is the primary location where conditions of the unit are monitored, controlled and where corrective actions are directed to mitigate any emergency.

<u>Curie</u>

The unit of radioactivity which is equivalent to 3.7×10^{10} disintegrations per second; millicurie (mCi) = one-thousandth curie; microcurie (μ Ci) = one-millionth curie; picocurie (pCi) = one-millionth microcurie.

Decontamination

The reduction or removal of contaminating radioactive material from a person, area or object by cleaning or washing.

Dosimeter

A device that records radiation exposure.

Emergency

Any abnormal condition that could affect the health and safety of people or safe operation of equipment.

Emergency Action Levels (EALs)

Thresholds for initiating emergency actions such as designating a particular class of emergency, initiating a notification procedure, or initiating a particular protective action.

Emergency Classification System

A system that arranges abnormal conditions in order of severity. They are listed as follows in order of increasing severity:

- UNUSUAL EVENT (State Posture Code, DELTA ONE/DELTA TWO)
- ALERT (State Posture Code, CHARLIE-ONE)
- SITE AREA EMERGENCY (State Posture Code, CHARLIE-TWO)
- GENERAL EMERGENCY (State Posture Code, BRAVO/ALPHA)

Emergency Operations Facility (EOF)

A facility located 15 miles north of Millstone from which station activities related to an emergency will be carried out and from which information will be provided to the corporate, federal, state officials and local community chief executive officers.

Emergency Planning Zone (EPZ)

An area surrounding the Millstone Power Station for which planning is conducted to ensure that prompt and effective actions can be taken to protect the public in the event of an accident. For the plume exposure pathway, the EPZ has a corresponding radius of about 10 miles; and for the ingestion exposure pathway, the EPZ has a corresponding radius of about 50 miles.

Event Based EAL

A listing of symptoms and conditions under generic event categories.

Event Category

A generic group of plant conditions; e.g., loss of power, equipment failure, radiation hazard, security threat, etc.

Exposure Pathway

Plume Exposure Pathway

The pathway by which exposure to a radioactive plume and subsequent deposition of radioactive material could result in external exposure and by which inhalation of the radioactive plume could result in internal exposure.

Ingestion Exposure Pathway

The pathway by which deposited radioactive materials could be ingested from contaminated water or food, such as milk or fresh vegetables which would cause internal exposure.

Full Staffing

SERO positions which are beyond the required minimum staffing. Full staffing positions, as a goal, will be staffed within 4 hours of SERO activation. Personnel assigned to fill these positions are drawn from a pool of qualified individuals.

Hostile Action

An act toward a Nuclear Power Plant (NPP) or its personnel that includes the use of violent force to destroy equipment, take hostages, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, projectiles, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. Hostile Action should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism based EALs should be used to address such activities (e.g., violent acts between individuals in the owner control area).

Hostile Force

One or more individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maining or causing destruction.

Incident

An unexpected occurrence that could lead to an emergency.

Independent Spent Fuel Storage Installation (ISFSI)

A complex designed and constructed for the interim storage of Millstone Power Station spent nuclear fuel.

Joint Media Center

The Joint Media Center is the principal contact point between the media and Millstone Station, state, and local community representatives. It is a facility where informational releases are made to the public and media and press conferences are held.

Minimum Staffing

Personnel assigned to fulfill a specific SERO position and who report to the station in accordance with Table 5-1.

<u>On-Shift</u>

Personnel assigned to duties as part of a normal shift complement.

Off-site

The area outside the owner controlled area of the Millstone Power Station.

On-site

The area inside the owner controlled area of the Millstone Power Station.

<u>Appendix A</u>

Operational Support Center (OSC)

A center co-located with the TSC where operational support of the emergency is provided.

OSC Assembly Area

An emergency repair team staging area supporting OSC activities.

Precautionary Dismissal

A dismissal of non-essential personnel at the Alert level which directs all non-essential Millstone employees, contractors, and visitors to leave the site.

Procedures

Emergency Operating Procedures (EOP)

Procedures which provide specific actions to mitigate the consequences of and terminate an emergency situation.

Emergency Plan Implementing Procedures (EPIs)

Procedures which implement the Station Emergency Plan. These procedures specify the emergency organization and actions that would be required of station and other on-site personnel during an emergency.

Supplemental Procedures

Station operating, health physics, radiological control, administrative, security and training procedures.

Projected Dose

The estimated potential dose that could be received by affected individuals if no protective actions are taken.

Protective Action Guides (PAGs)

Projected absorbed dose to individuals in the general population which warrants protective action.

Radiation (ionizing)

The emission and propagation of energy through a medium in the form of electromagnetic waves or particles which impart their energy to the medium through the creation of electrically charged ion pairs directly or indirectly in its passage through the medium.

Radioactivity

The property possessed by certain unstable radionuclides of spontaneously emitting charged particles, gamma photons or X-rays.

Radiopager System

The system used by Millstone Power Station for prompt notification of emergency response personnel.

Shift Manager's Work Station

The Unit 2 control room location from which indications and alarms for Unit 1 are monitored and control functions are performed.

Station Emergency Operations Center

A facility in Hartford, CT, where responses to overall direction for major emergencies in Connecticut are coordinated.

Station Emergency Response Organization

The organization responsible for station operations under emergency conditions.

<u>State</u>

The State of Connecticut.

Site Evacuation

The orderly withdrawal of personnel from the owner controlled area except designated resource and SERO personnel.

<u>State Plan</u>

The State of Connecticut Emergency Operations Plan, Annex V, Fixed Nuclear Facilities Radiological Emergency Response Plan.

Station Evacuation

The orderly withdrawal of all personnel from the protected area, except designated resource and SERO personnel.

<u>Symptom</u>

A predetermined site and unit specific parameter observable in the Control Room (or reported to the Control Room) that is the threshold for a plant "condition" that places the plant in a given emergency classification. A symptom can be an instrument reading, equipment status indicator, a measurable parameter (on-site or off-site), a discrete observable event, or the results of analyses.

Technical Support Center (TSC)

A center located where technical support personnel monitor station conditions and provide data interpretation.

<u>Appendix A</u>

ABBREVIATIONS AND ACRONYMS

AC	-	Alternating Current
ADM	-	Administrative
AFW	_	Auxiliary Feedwater
ADTS	_	Assistant Director Technical Support
	_	As Low As Reasonably Achievable
	. –	Annual Limit on Intake
	-	Advanced Life Support
	-	Aggistant Manager Padialogical Daga Aggagement
	-	Assistant Management Team
	-	Accident Management Team
ANST	-	American Nuclear Insurers
AINSI	-	American National Standards Institute
AOP	-	Abnormal Operating Procedure
ARC	-	American Red Cross
ARCOS	-	Automated Rose Call Out System
ARMS	-	Area Radiation Monitoring System
ARPS	-	Assistant Radiation Protection Supervisor
ASME	-	American Society of Mechanical Engineers
ATWS	-	Anticipated Transient Without Scram
BAST	-	Boric Acid Storage Tank
BLS	_	Basic Life Support
BP	_	Blood Pressure
BWR	_	Boiling Water Reactor
Buit		Doning Water reactor
CAR	_	Containment Air Recirculation (system)
CBETS	-	Computer Based ExposureTracking System
$CC \text{ or } CM^3$	-	Cubic Centimeter
CDA	-	Containment Depressurization Actuation
CDC	-	Center for Disease Control
CDE	, _	Committed Dose Equivalent
CEDE	-	Committed Effective Dose Equivalent
CERT	_	Community Emergency Response Team
CES	-	Corporate Executive Spokesperson
CFH	_ .	Certified Fuel Handler
CFM	-	Cubic Feet per Minute
CFR	-	Code of Federal Regulations
Ci	-	Curie (Unit of Radioactivity)
CMS	-	Central Monitoring Station
CO	-	Control Operator
CONVEX	-	Connecticut Valley Exchange
CPM	-	Counts per minute
CR	-	Control Room
CRDC	-	Control Room Data Coordinator
CRDM	-	Control Rod Drive Mechanism
CRDSEO	_	Control Room Director of Station Emergency Operations
		contract records of Station Entergency operations

		<u>Appendix A</u>
CRS	· _ ·	Control Room Simulator
CSS	-	Core Spray System
CST	· -	Condensate Storage Tank
СТ	-	Connecticut
CTNG	-	Connecticut National Guard
CVCS	-	Chemical and Volume Control System
DAC		Derived Air Concentration
	-	Derived Air Concentration
	-	Design Dasis Accident
	-	Design Basis Earinquake
DEMIC	-	Damage Control
DEMHS	-	Division of Emergency Management and Homeland Security
DERU	-	Dominion Energy Nuclear Connecticut
DEEP	-	Department of Energy and Environmental Protection
DHS	-	Department of Health Services (formerly DHE w)
DIL	-	(FDA) Derived Intervention Level
DLR	-	Dosimeter of Legal Record
DSEO	-	Director of Station Emergency Operations
DOE	-	U.S. Department of Energy
DOT	-	Department of Transportation
DPH	-	Department of Public Health (CT)
$dpm/100 cm^2$	-	Disintegrations per minute per 100 square centimeter area
DPM	-	Disintegrations per minute
DRO	-	Director of Recovery Operations
EAL	-	Emergency Action Level
EAS	-	Emergency Alert System
EC	-	Emergency Communicator
ECCS	-	Emergency Core Cooling System
ED	-	Emergency Department (hospital)
EDAN	_	Environmental Data Acquisition Network
EDG	_	Emergency Diesel Generator
FIS	_	Emergency Information Specialist
EMR	_	Emergency Medical Responder
FMS	_	Emergency Medical Services
EMIS EMT-B	_	Emergency Medical Technician – Basic
EMT-P	_	Emergency Medical Technician – Paramedic
ENIT-I ENIDS	-	Emergency Notification and Response System
ENR	-	NPC Emergency Notification System telephone
ENC	-	Emergency Operations Center (State local or Site)
EOC	-	Emergency Operations Center (State, local, of Sile)
EOF	-	Emergency Operating Flocedure
	-	Environmental Protection Agency
EFA	-	Environmental Florection Agency
	-	Emergency Fian Auministrative Frocedure
EFC EDI	-	Emergency Flamming Coordinator
EFI EDDI	-	Energency Plan Implementing Procedure
EFKI	-	Electric Power Research Institute

Appen	<u>dix</u>	A
		_

EPZ	-	Emergency Planning Zone
ERF	-	Emergency Response Facility
ERO	-	Emergency Response Organization
FSST	_	Emergency Station Service Transformer
ECCI		Execution Time Estimate
	. –	Evacuation Time Estimate
EIS	-	Environmental Technical Specification
FCV	-	Flow Control Valve
FDA	-	Food and Drug Administration
FEMA	-	Federal Emergency Management Agency
FERC	_	Federal Energy Regulatory Commission
FFD	_	Fitness For Duty
FSAR	_	Final Safety Analysis Report
ECDC	_	Easility Safety Deview Committee
FORC	-	Facility Salety Review Committee
FIDC	-	Field Team Data Coordinator
GCS	-	Glasgow Coma Scale
GE	-	General Emergency
GM	-	Geiger-Mueller detector
gpd	-	Gallons per day
gr	_	Gallon per minute
ghu		Suiton per minute
ПАР		Hagtila Action Paged
	-	Hish Dff is an Destinglets Air Dilter
HEPA	-	High Efficiency Particulate Air Filter
HP	-	Health Physics
HP	-	High Pressure
HPN	-	NRC Health Physics Network Telephone
HVAC	-	Heating Ventilation and Air Conditioning System
Ŧ.	-	lodine
I&C	_	Instrumentation and Calibration
		Insident Commander
	-	Incident Commond Dest
ICP	-	Incident Command Post
ICSC	-	Innsbrook Corporate Support Center
ILRT	-	Integrated Leak Rate Testing
INPO	- .	Institute of Nuclear Power Operations
IPZ	_	Ingestion Pathway Zone
IRF		Incident Report Form
ISFSI	-	Independent Spent Fuel Storage Installation
	_	In Service Inspection
	-	
TC		Laint Information Courter
JIC		Joint Information Center
JMC	-	Joint Media Center
KI	-	Potassium Iodide
KW	-	Kilowatt
KWh	-	Kilowatt-hour
	•	

LCO	-	Limiting Condition for Operation
LER	-	Licensee Event Report
LI	-	Level Indicator
LOCA	-	Loss of Coolant Accident
LPCI	-	Low Pressure Coolant Injection
LPSI	-	Low Pressure Safety Injection
		, second s
MA	-	Massachusetts
MAX	-	Maximum
MCI	-	Mass Casualty Incident
MCL	-	Media Center Liaison
MCRO	-	Manager of Control Room Operations
Met	-	Meteorological
MEOR		Millstone Emergency Offsite Representative
MOC	-	Manager of Communications
MOR	_	Manager of Resources
MOS	-	Manager of Security
MOV	_	Motor Operated Valve
MP	-	Millstone Point
MPS	-	Millstone Power Station
MRCA		Manager of Rádiological Consequence Assessment
MRDA	-	Manager of Radiological Dose Assessment
mR	-	MilliRoentgen
mRad	_	MilliRad
mRem	_	Millirem = 1/1000 Rem
mRem/hr	_	1/1000 Rem per hour
MRC	_	Medical Reserve Corporation
MSIV	_	Main Steam Isolation Valve
MSRC	-	Management Safety Review Committee
MTSC	-	Manager of Technical Support Center
MW	_	Megawatt
		1105uttati
NAP	_	North Access Point
NCRP	_	National Council on Radiation Protection (and
1.020		Measurement)
NEI	_	Nuclear Energy Institute
NFSA	-	Nuclear Fuel and Safety Analysis (formerly RES)
NG	_	National Guard
NRC	_	US Nuclear Regulatory Commission
NNM	_	Nuclear News Manager
NOUE	_	Notification of Unusual Event
NSSS	_	Nuclear Steam Supply System
NSST		Normal Station Service Transfer
NUREG	2	Nuclear Regulation
NY	-	New York
		- · · -

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		<u>Appendix A</u>
OBE	-	Operational Basis Earthquake
OFIS	-	Off-site Facilities Information System
OMF	-	Offsite Monitoring Facility – EOF
OOS	-	Out of Service
ORO .	-	Organization for Recovery Operations
OSC .	-	Operational Support Center
OSCAA	-	Operational Support Center Assembly Area
РА	-	Physician's Assistant
PA	-	Public Address System
PAD	-	Protective Action Decision
PAG	-	Protective Action Guide
PAR	_	Protective Action Recommendation
PASS	_	Post Accident Sampling System
PAT	-	Plant Access Training
PC	_	Protective Clothing
	_	Police Department
PEO	_	Plant Equipment Operator
DE		Protection Factor
PIO	-	Public Information Officer
סות	-	Plant Incident Penort
	-	Power Operated Palief Value
	-	Probabilistic Disk Assessment
T NA DCAD	-	Public Service Anguering Post
r SAr DCI	-	Pounda non Square Inch
PSIC	-	Pounds per Square Inch Deum de non Square Inch Course
	-	Pounds per Square men Gauge
PWK	-	Pressurized water Reactor
PZK	-	Pressurizer
Q		Release Rate
QA	-	Quality Assurance
R	-	Roentgen. A unit of radiation exposure
rad	-	Unit of radiation dose
RAE	-	Radiological Assessment Engineer
RC	-	Reception Center
RCA	-	Radiological Control Area
RCP	-	Reactor Coolant Pump
RCS	-	Reactor Coolant System
REM	-	Unit of radiation dose
Resp	-	Respirations
RERP	-	Radiological Emergency Response Plan
RHR	-	Residual Heat Removal
RIEMA	-	Rhode Island Emergency Management Agency
RL	-	Regulatory Liaison
RMS	-	Radiation Monitoring System
RMT	-	Radiological Monitoring Team

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		<u>Appendix A</u>
RO	-	Reactor Operator
RP	-	Radio Pager
RPM	-	Radiation Protection Manual
RWP	-	Radiation Work Permit
RWST	-	Refueling Water Storage Tank
SAE	-	Site Area Emergency
SAP	-	South Access Point
SCBA	-	Self-Contained Breathing Apparatus
SDO	-	Station Duty Officer
SEOC	-	State Emergency Operations Center
SERO	-	Station Emergency Response Organization
SIS	-	Safety Injection System
SM	-	Shift Manager
SOP	-	Step Off Pad
SPDS	-	Safety Parameter Display System
SpO_2	-	Oxygen saturation
SRD	-	Self Reading Dosimetery
SRO	-	Senior Reactor Operator
STA	-	Shift Technical Advisor
State		State of Connecticut
TA	-	Technical Assistant
TEDE	-	Total Effective Dose Equivalent
TIC	-	Technical Information Coordinator
TSA	-	Transportation Staging Area
TSC	~	Technical Support Center
TSCEE	· _	Technical Support Center Electrical Engineer
TSCSM	-	Technical Support Center Shift Manager
UC	-	Unified Command
US	-	Unit Supervisor
USCG	-	US Coast Guard
u	-	Wind speed
μCi	-	Microcuries
X (chi)	-	Concentration
X/Q	-	Relative Concentration

Millstone Station Emergency Plan Revision 57 August 2018

APPENDIX B

LETTERS OF AGREEMENT

Millstone Station Emergency Plan Revision 57 August 2018

<u>Appendix B</u>

Page	Organization		
B-3	Amtrak		
B-4	Electric Boat Division of General Dynamics		
B-5	Institute of Nuclear Power Operations		
B-6	Lawrence & Memorial Hospital		
B-7	Middlesex Hospital		
B-8	Shipman's Fire Equipment Company, Inc.		
B-9	State of Connecticut, Department of Emergency Services and Public Protection- Office of the Commissioner		
B-10	Teledyne Brown Engineering		
B-11	Town of Waterford Ambulance Service		
B-12	Town of Waterford Fire Service		
B-13	Town of Waterford Police Department		
B-14	AccuWeather		
B-15	GEL		
B-16	Norwich Fire Department		
B-17	Salem Volunteer Fire Department		

Note: The letters of agreement are reviewed annually and verified to be current. Only letters with significant changes require reissue.

November 13, 2017

Mr. John Daugherty Site Vice President Dominion Nuclear Connecticut Rope Ferry Road Waterford, CT 06385

Dear Mr. Daugherty:

This letter is to confirm that the National Railroad Passenger Corporation will, when requested respond in the event of an emergency at the Millstone Power Station on Long Island Sound, in the following areas:

Implementation Criteria/Authorities, Responsibilities

It is our understanding that, in the event of an emergency, the nuclear facility Director Site Emergency Operations may request our assistance. Assistance should be requested by calling the Chief Train Dispatcher of the Boston CETC Office at 61/345-7474. Indicate the nature of the incident, the location, and the type of assistance required.

Measures to be Provided/Limits of Actions

Our commitment for assistance is to direct train traffic away from any areas that may be affected by the emergency.

Information Exchange /Point of Contact at Site

Verification communications to the nuclear facility will be by telephone to the Director of Site Emergency Operations at 860/892-5600. Information exchange can be provided by using the Chief Tran Dispatcher's number.

Training and Drills

Please notify us of your plant drills so that we may have the opportunity to observe your emergency response actions and meet your emergency operations personnel. Please coordinate by contacting my office at 617/345-7406.

Mr. John Daugherty November 13, 2017 Page Two

This letter of agreement shall remain in effect until cancellation by either party, provided on ninety (90) days prior written notice, and shall be reviewed and certified as needed.

Sincerely. Steven Voung/AV

Transportation Northeast SubDivision

cc: W. B. Moore, Deputy Chief – Amtrak Police S. Pugsley, Amtrak Emergency Management

Enclosure (1) to 438-37497 Page 1 of 2

LETTER OF AGREEMENT BETWEEN ELECTRIC BOAT CORPORATION AND DOMINION NUCLEAR CONNECTICUT RADIOLOGICAL ASSISTANCE

It is understood that the Electric Boat Corporation will, upon request, respond with personnel and equipment in the event of an emergency at the Millstone Power Station in accordance with the following:

1. In the event of a radiological emergency, the Director of the Site Emergency Organization may request personnel and equipment to assist in performing emergency radiological surveys. Assistance should be requested by calling:

> Director of Radiological Services Telephone: 433-3139 (during normal business hours)

2. If after normal business hours, or no answer, call in order:

RAD CON Office: 433-5019 or 433-5392 Shipyard Security: 433-5530 or 433-5531

NOTE: If shipyard Security is contacted, request that RAD CON Management be notified.

It is understood that the Electric Boat Corporation's commitment for assistance includes providing trained radiological control personnel and equipment for the purpose of performing emergency radiation, contamination, and airborne radioactivity measurements. Personnel responding to the facility's request for assistance will report to the Manager of Resources who will be located in the Emergency Operations Facility (EOF).

Enclosure (1) to 438-37497 Page 2 of 2

It is understood that should the Electric Boat shipyard be affected by a radioactive release from another facility, Electric Boat resources will be used, as the first priority, to protect the shipyard and its personnel; support will be provided to Millstone Station as available.

It is understood that in each case where assistance is provided under this Agreement, all radiological waste from the emergency will remain the responsibility of the affected facility.

It is understood that verification of communications will be by telephone to:

Manager of Resources	- 442-5139
Director Station Emergency Organization	- 443-2276

Information exchange can be provided by using the same telephone number.

It is understood that Millstone Station will train representatives of Electric Boat Corporation's Radiological Training Section annually on the use of Station equipment and procedures. These Radiological Training Section individuals, in turn, will train selected Electric Boat Corporation personnel on this equipment and procedures. It is understood that this training will be performed annually and the Electric Boat Corporation will be given advance notification of plant drills or additional training that would be advantageous to both organizations.

This Letter of Agreement shall remain in effect until cancellation by either party, provided on ninety-(90) days prior written notice, and shall be reviewed and certified as needed.

	Dominion Nuclear Connecticut
By:	. Hopher Deare for
Name	J. Alan Price

Site Vice-President

ъ

Title:

Date:

Electric Boat Corporation

M. Toner

Presiden 29/02

AGREEMENT BETWEEN PARTIES

November 8, 2013

Nuclear Power Plant Emergency Response Assistance Agreement

This Nuclear Power Plant Emergency Response Assistance Agreement (hereinafter "Agreement") has been entered into by and among INPO and electric utilities that have responsibility for the construction or operation of commercial nuclear power plants under a license issued by the U.S. Nuclear Regulatory Commission pursuant to Title 10 of the Code of Federal Regulations (hereinafter "nuclear power plants") and that have subscribed counterpart signature pages in the form attached hereto (hereinafter "Parties").

The Parties wish to set forth herein their understanding and agreement with respect to their mutual undertaking to each other in the situation wherein an emergency occurs at a nuclear power plant under the control of or operated on behalf of a Party or wherein an event arises during the transportation of nuclear materials shipped by or on behalf of a Party, and a request for assistance is issued to another Party and such assistance is provided. For purposes of this agreement, a nuclear power plant emergency is defined as an event warranting classification as a site area emergency or greater and that has the potential to damage fuel.

This Agreement is intended only to define the terms and conditions under which such assistance will be rendered and received. It is understood that this Agreement does not impose any obligation on any Party to render or continue to render any such assistance, but this Agreement records the understanding of the Parties with respect to the rights and obligations that will be incurred in responding to requests for assistance. Attachment A, "Coordination Agreement on Sharing Emergency Information Among EPRI, INPO, NEI, and Their Member Utilities" describes the responsibilities and expected actions for EPRI, INPO, and NEI.

NOW, THEREFORE, it is agreed, that:

- 1. Assistance rendered by a Party as described hereunder may be given in response to a request by any Party for help following an emergency arising at a nuclear power plant or during the transportation of nuclear materials. If such assistance is given, it shall be rendered in accordance with the terms and conditions herein.
- 2. The Party that requests assistance shall be known as the "Requesting Company" and the Party furnishing assistance shall be known as the "Responding Company."
- 3. Assistance shall be defined as the requested, offered and/or actual responsive assistance to a request under the terms of this Agreement by a Responding Company, as documented in an Assistance Agreement.
- 4. Assistance Agreement shall be defined as a scoping document that may be as informal as an email, fax, or phone request (followed with documentation) in emergency circumstances that lists the requested, offered and agreed upon Assistance, that references this Agreement, and that is agreed to by both the Requesting and Responding Parties.

AGREEMENT BETWEEN PARTIES

5. (a)

Requesting Company shall notify INPO or a Responding Company of the type of assistance requested and the anticipated duration during which such assistance is desired. If INPO is contacted directly, then INPO shall identify and contact the appropriate Responding Companies to ask for help in responding to an emergency. If a Responding Company is called directly, then the Responding Company may furnish such assistance that is within the scope of this agreement. Except as such companies may agree otherwise, Requesting Company shall be responsible for determining the procedures to be followed relative to the furnishing of such assistance, directing the work, and making any reports to governmental authorities and the news media regarding the emergency or the furnishing of assistance pursuant to this Agreement. Requesting Company shall notify Responding Company when its assistance is no longer needed.

(b)

The furnishing of assistance hereunder shall be deemed to have commenced when personnel of the Responding Company are assigned to other than normal duties or transportation of equipment commences pursuant to a determination by the Responding Company to provide assistance to a Requesting Company under this Agreement and shall be deemed to have terminated when the transportation of such personnel or equipment back to its working base, or home (for personnel returning at other than regular working hours), is completed.

(c)

The Responding Company shall make all arrangements for the transportation of its personnel and equipment from and to their working base or home.

6. (a)

Employees of Responding Company shall at all times continue to be employees of the Responding Company and shall at no time and for no purpose be deemed to be servants, agents, employees, or representatives of the Requesting Company.

(b)

Wages, hours, and other terms and conditions of employment applicable to personnel of the Responding Company shall be those of the Responding Company. Work procedures, security, and safety rules for such personnel shall be those of the Requesting Company.

(c)

Unless otherwise agreed, all personnel of the Responding Company shall be equipped by the Responding Company with such normal working and protective equipment as shall be compatible with the circumstances under which said personnel shall function hereunder; Requesting Company shall inform Responding Company of any specific equipment which may be required in a particular situation.

AGREEMENT BETWEEN PARTIES

November 8, 2013

7. (a)

Responding Company shall furnish the requested personnel and equipment to the extent that the Responding Company may determine to do so in its sole judgment and discretion.

(b)

Any information which Responding Company may provide to Requesting Company (including drawings, reports, and analyses) or which Requesting Company provides to Responding Company, which either the Responding Company or the Requesting Company considers proprietary or confidential, shall be so designated. Such proprietary information shall be held in confidence and shall be used exclusively in connection with the emergency at the nuclear power plant at which the emergency has occurred (including necessary disclosures on a proprietary basis to others in that connection) and shall not be published or otherwise disclosed to others, except as may be required by law. The restrictions set forth in this section 7.(b) shall not apply to information that the Receiving Company can establish by documentary evidence:

(1) is or has become generally known to, or readily ascertainable by, the public without fault or omission of either party or its employees or agents; or

(2) was already known to the Receiving Company prior to the first disclosure of such information by the disclosing party; or

(3) was received by the Receiving Company without restrictions as to its use from a third-party who is lawfully in possession and not restricted as to the use thereof; or (4) was independently developed through persons who have not had, either directly or indirectly, access to or knowledge of similar information provided by the other party.

(c)

Responding Company shall have the right, at any time and in its sole judgment and discretion and without any obligation to Requesting Company, to withdraw personnel and equipment furnished to the Requesting Company and return such personnel and equipment to its working base. Without limiting Responding Company's rights under the preceding sentence, Responding Company shall attempt to schedule any such withdrawal of its personnel or equipment to accommodate the needs of Requesting Company. Responding Company shall give written notice at least 24 hours in advance to Requesting Company of the permanent withdrawal of personnel or equipment furnished. Responding Company's withdrawal of personnel or equipment shall not affect any obligations which may have been incurred hereunder prior to such withdrawal or which may arise out of events occurring prior to such withdrawal.

8. All time sheets and work records pertaining to Responding Company personnel and equipment shall be kept by the Responding Company. The Responding Company shall furnish the Requesting Company with a detailed statement of all costs and expenses paid or incurred by the Responding Company in connection with the furnishing of assistance to the Requesting Company, which statement shall be paid by Requesting Company within thirty (30) days after receipt.

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AGREEMENT BETWEEN PARTIES

9. The Requesting Company shall reimburse Responding Company for all direct and indirect costs and expenses, not including a profit, incurred by Responding Company in giving assistance pursuant to this Agreement, including but not limited to costs and expenses related to or resulting from compliance with governmental requirements such as Title 10 of the Code of Federal Regulations Part 20. Such costs and expenses shall be computed in accordance with Responding Company's standard rates and accounting practices, including such overheads as are determined by Responding Company to be applicable to such direct and indirect costs and expenses incurred by Responding Company. Requesting Company shall have the right to request a third party audit the records of Responding Company relative to work performed pursuant to this Agreement.

10. (a)

In addition, and subject to the provisions of paragraph 10(b) hereof, Requesting Company shall indemnify and hold Responding Company, its officers, directors, and employees, jointly and severally, harmless from and against any and all liability or loss, damage, cost, or expense which any of them may incur by reason of bodily injury, including but not limited to death, to any person or persons, or by reason of damage to or destruction of any property, including but not limited to any property located at the site of the Requesting Company's nuclear power plant or the loss of use of any property, which results from furnishing assistance pursuant to this Agreement, whether due in whole or in part to any act or omission, or negligence of Responding Company, its officers, directors, or employees.

(b)

Where payments are made by Responding Company or its insurers to Responding Company's officers, directors, or employees or their beneficiaries for bodily injury or death resulting from furnishing assistance pursuant to this Agreement, including but not limited to workers' compensation, disability, pension plan, medical and hospitalization, or other such payments, Requesting Company shall make reimbursement to Responding Company to the extent such payments increase the Responding Company's employees' related costs, whether such increase in costs occur in the form of an increase in premiums or contributions, a reduction in dividends or premium refunds, or otherwise. Requesting Company shall also reimburse Responding Company for any deductible amounts or for any amounts paid by Responding Company as a self-insurer. Responding Company will request its insurer to waive any right of subrogation it may have against Requesting Company as a result of any payment described in this paragraph 10(b) which such insurer may make on behalf of Responding Company because of Responding Company's furnishing of assistance pursuant to this Agreement.

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November 8, 2013

(c)

Responding Company makes no warranty with respect to any goods or services provided to Requesting Company and NO WARRANTY, EITHER EXPRESS OR IMPLIED, ORAL OR WRITTEN, SHALL APPLY TO THE GOODS OR SERVICES PROVIDED, INCLUDING, WITHOUT LIMITATION, THE WARRANTIES OF MERCHANTABILITY AND OF FITNESS FOR SPECIFIED OR INTENDED PURPOSE. All equipment and services furnished by Responding Company pursuant to this Agreement are furnished as is.

(d)

In the event any claim or demand is made or suit, action, or proceeding is filed against Responding Company, its officers, directors, or employees, jointly or severally, alleging liability for which Requesting Company shall indemnify and hold harmless Responding Company, its officers, directors, and employees under this paragraph 10 hereof, Responding Company shall promptly notify Requesting Company thereof, and Requesting Company, at its sole cost and expense, shall settle, compromise, or defend the same in such manner as it in its sole discretion deems necessary or prudent. Responding Company shall cooperate with Requesting Company in the resolution of any such matter. If a Requesting Company settles a liability suit with a 3rd party that involves a Responding Company, Requesting Company will ensure the Responding Compnay is released from liability.

(e)

Each Party to this Agreement agrees to carry the amount of financial protection required by the Atomic Energy Act of 1954, as amended, and self-insurance or comprehensive liability insurance, including contractual liability coverage, covering the indemnification and defense obligations set forth herein, subject to such types and amounts of selfinsurance, retentions, or deductibles as are consistent with standard business practice in the industry.

(f)

In the event a Responding Company provides assistance pursuant to this Agreement through an affiliate or subsidiary, the indemnification provided in this paragraph 10 to the officers, directors, and employees of that Responding Company shall apply with equal force to the officers, directors, and employees of that affiliate or subsidiary.

11. Each Party shall provide the Institute of Nuclear Power Operations (hereinafter "INPO") with an executed counterpart signature page to this Agreement and to any amendments or attachments hereto. This Agreement shall become effective when counterpart signature pages executed by at least two Parties shall have been received by INPO. This Agreement shall remain in effect as to any Party until such Party has withdrawn from the Agreement as provided below.

12. (a)

INPO may provide certain administrative and emergency response support services in furtherance of this Agreement, such as maintaining and distributing to the Parties a roster of the signatories to this Agreement; providing copies of the Agreement and any amendments thereto to all Parties; and preparing and distributing to the Parties other documents, such as a list of sources of emergency manpower and equipment. INPO may provide such other services as may be requested of INPO from time to time by the Parties. The Parties recognize that INPO shall not be responsible for implementing, enforcing, or interpreting this Agreement.

AGREEMENT BETWEEN PARTIES

(b)

The Parties shall defend, indemnify, and hold harmless INPO, its officers, directors, and employees, jointly and severally, from and against any and all liability or loss, damage, cost, or expense which results from performance of INPO's functions described in paragraphs 12(a) and 12(c) of this Agreement. Each Party hereby expressly waives any right it may have to assert any claim against INPO, its officers, directors, or employees arising out of its or their performance of INPO's functions described in paragraphs 12(a) and 12(c).

(c)

Following an emergency at a nuclear power plant the Requesting Company may contact INPO for help in locating and coordinating delivery of requested resources and equipment. Based on that contact from the Requesting Company, INPO will proceed to locate requested equipment and human resources and coordinate assistance delivery. This agreement does not preclude the Requesting Company from contacting other Parties (Responding Companies) for assistance. In either case the Assistance Agreements will be established between the Requesting Company and Responding Companies.

(d)

If INPO furnishes assistance and unless otherwise agreed by INPO and the Requesting Company, the Requesting Company and INPO shall have the same rights and obligations as if INPO were a Responding Company (including but not limited to the Requesting Company's obligations to INPO, its officers, directors, and employees under paragraph 10 hereof), except that paragraphs 8 and 9 and 10(e) shall not apply to INPO.

13. This Agreement will not create any rights or defenses in favor of any entity or person not a signatory to this Agreement except to the extent provided in this paragraph and in paragraphs 10 and 12 of this Agreement. This agreement shall be binding upon and inure to the benefit of each signatory to this Agreement and the subsidiaries and affiliates of each such signatory.

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AGREEMENT BETWEEN PARTIES

November 8, 2013

- 14. Except as otherwise provided in paragraph 15, any Party may withdraw from this Agreement upon at least thirty (30) days prior written notice to INPO with a copy to all of the other Parties. Notice of withdrawal shall not affect any obligations which may have been incurred hereunder prior to the effective date of such notice or which may arise out of events occurring prior to the date. No Party may withdraw from this Agreement while it is receiving assistance pursuant to this Agreement.
- 15. This Agreement may be amended by the agreement of a majority of the Parties hereto. Such amendment shall be effective and binding upon all Parties thirty (30) days after INPO has received counterpart signature pages for the amendment executed by at least a majority of the Parties to the Agreement. INPO shall notify all Parties when at least a majority of the Parties have executed an amendment to the Agreement. No amendment shall affect any obligation that may have been incurred hereunder prior to the effective date of such amendment or that may arise out of events occurring prior to that date. Notwithstanding the first sentence of paragraph 14, any Party may withdraw from this Agreement by submitting written notice to INPO at any time during the thirty (30) day period prior to the effective date of such amendment with a copy to all of the other Parties.
- 16. If any provision of this Agreement is determined to be invalid or unenforceable as to any Party or otherwise, such determination shall not affect the validity or enforceability of the other provisions of this Agreement as to that Party or otherwise.
- 17. In the event (i) an emergency occurs at a nuclear power plant under the control of or operated on behalf of a Party, or an event associated with transportation of nuclear materials shipped by or on behalf of a Party; (ii) a request for assistance is issued to another Party hereto in respect to such emergency; and (iii) such assistance is provided, this Agreement shall be construed in accordance with the law of the State in which the nuclear power plant is located with respect to all rights and obligations arising out of such emergency.
- 18. This Agreement, together with the attachments hereto, shall constitute the entire agreement between and among the parties hereto relating to nuclear power plant emergency response. This agreement, once signed, supersedes previous assistance agreements among the parties hereto.

7

AGREEMENT BETWEEN PARTIES

November 8, 2013

EXHIBIT

COUNTERPART SIGNATURE PAGE

The undersigned company hereby agrees to become a Party to the Nuclear Power Plant Emergency Response Assistance Agreement and its attachments.

Date 111213	Company DOMINION
By Delle	(Corporate Officer Signature)

Printed Name: DAVLD A HEACOCK

<u>Appendix B</u>

Coordination Agreement on Sharing Emergency Information Among EPRI, INPO, NEI, and Their Member Utilities

Background:

In order to provide for the efficient and timely transfer of technical and public information regarding emergencies at nuclear power stations and to maximize their assistance roles to their utility members and the industry, the Electric Power Research Institute (EPRI), the Institute of Nuclear Power Operations (INPO), and the Nuclear Energy Institute (NEI) have agreed to coordinate their actions and activities as outlined in this agreement.

It is recognized that the primary responsibility for release of appropriate information concerning an emergency situation to the public and the news media rests with the affected utility. The purpose of this agreement is to provide a coordinated process by which the industry organizations can effectively convey information to the rest of the industry and to the media, in order to lessen the burden on the affected utility.

Agreement:

1. Among the three organizations involved in this coordination agreement, NEI will provide information concerning industrywide implications of an emergency and will use existing mechanisms and media contacts to disseminate timely information regarding the emergency.

- NEI will develop and issue, in coordination with the affected utility, appropriate public statements to the news media, as necessary.
- NEI will provide information about the emergency and associated press releases to its members and other industry organizations.
- NEI also will make all relevant information available to Edison Electric Institute (EEI) and EPRI.
- NEI will maintain an emergency response capability for consultation on regulatory issues and handle inquiries from media, government, and other organizations and individuals.

2. Among the organizations, INPO will coordinate assistance requests from the utility to other INPO members and participants.

- INPO will notify NEI and EPRI of U.S. events classified Alert or higher or non-U.S. events classified as level 4 or higher on the International Nuclear Events Scale.
- INPO will provide communications to its members, participants, EPRI and NEI to facilitate the flow of technical information about the emergency and share information provided by the affected utility on a selected basis.

- INPO will maintain an emergency resource capability to furnish EPRI and NEI technical information relevant to the emergency as obtained from the utility and/or available in its own databases.
- INPO will maintain information on industry assistance capabilities including:
 - o Personnel with specialized plant or emergency response knowledge
 - o Emergency response equipment available for sharing with the affected utility.
- INPO will coordinate the delivery of persons and material under its Nuclear Power Plant and Transportation Agreements, as requested by the affected utility.

3. Among the organizations, EPRI will maintain an emergency response capability and will be available for consultation and to conduct in-depth analyses of the emergency as appropriate.

• Both EPRI and INPO will be available to assist the affected utility through their technical analysis and events analysis capabilities, respectively. EPRI and INPO will coordinate such efforts with each other.

4. EPRI, INPO, and NEI will develop and share written procedures governing emergency notifications and specifying points of contact to provide for cross-notification of emergencies.

AGREEMENT BETWEEN PARTIES

November 8, 2013

EXHIBIT

COUNTERPART SIGNATURE PAGE

The undersigned company hereby agrees to become a Party to the Nuclear Power Plant Emergency Response Assistance Agreement and its attachments:

Date January 3, 2014 Company Institute of Nuclear Power Operations

By Willie E. Willie ? (Corporate Officer Signature)

Printed Name: William E. Webster, Executive Vice President



BRUCE D. CUMMINGS President & Chief Executive Officer email: bcummings@lmhosp.org 365 Montauk Avenue | New London, CT 06320 860.442.0711, Ext. 4645. | FAX 860.271.4474

November 23, 2015

John Daugherty, Station Vice President Dominion Nuclear Connecticut Inc. PO Box 128 Waterford, CT 06385

Dear Mr. Daugherty,

This letter is to confirm that Lawrence + Memorial Hospital will respond in the event of a radiological emergency at Millstone Power Station.

Implementation Criteria / Authorities, Responsibilities

It is our understanding that in the event of an emergency, the nuclear facility may request medical assistance. The Hospital Emergency Department is to be contacted at calling (860)442-0711 ext. 2261 and requesting to speak to Emergency Department Charge Nurse to activate our Radiation Accident Plan.

Measures to be Provided/Limits of Action

Our commitment for medical assistance includes patients who might be injured as a result of an industrial or radiation accident and who are in need of medical treatment at Lawrence + Memorial Hospital.

This letter of agreement shall remain in effect until cancelation by either party, provided on ninety (90) days prior written notice, shall be reviewed and certified as needed.

Sincerely,

Bruce D. Cummings, FACHE President and CEO

cc:

- Oliver Mayorga, MD, Chair, Emergency Department ~ Lawrence + Memorial
- Ron Kersey, Emergency Medical Services Coordinator ~ Lawrence + Memorial
- Karen Ramus-Stone RNC, MSN, Director of Parent/Child, Critical Care, Paramedics and Emergency Services ~ Lawrence + Memorial
- Gregory M. Olexy, Emergency Preparedness Specialist ~ Dominion Nuclear Connecticut, Inc.
- D. Smith, Emergency Planning Service ~ Dominion Nuclear Connecticut, Inc.



ADMINISTRATION

November 19, 2015

Mr. John Daugherty Vice President & Senior Nuclear Executive Dominion Nuclear Connecticut, Inc. Millstone Power Station Rope Ferry Road Waterford, CT 06385

Dear Mr. Daugherty:

This letter represents a continuance of the Letter of Agreement between Millstone Power Station and Middlesex Hospital.

Middlesex is ready to receive and administer treatment to accident victims sent to us by Millstone Power Station. We will provide backup and support for Lawrence and Memorial Hospital, acting as the secondary medical treatment facility for the Millstone Station. Any expenses incurred as a result of providing these services will be the responsibility of Millstone Power Station.

In case of an emergency situation, we would follow the plan for "Decontamination and Treatment of the Radioactively Contaminated Patient at Middlesex Hospital," currently in effect between our institution and the facility mentioned above.

If you have any questions concerning our arrangements for contaminated patients, please contact me.

Sincere

Gary Havican Vice President Strategic Planning & Ambulatory Operations

GH:aac

c: David A. Smith, Manager, Emergency Preparedness, Millstone

28 Crescent Street Middletown, Connecticut 06457-3650

A member of the Middlesex Health System

tel 860 344-6000 fax 860 346-5485



SHIPMAN'S FIRE EQUIPMENT CO., INC. 172 CROSS ROAD WATERFORD, CONNECTICUT 06385-0257 (860) 442-0678



October 12, 2017

Mr. John Daugherty Site Vice President Dominion Nuclear Connecticut Millstone Station Rope Ferry Road Waterford, CT 06385

Dear Mr. Daugherty:

This letter is to confirm that Shipman's Fire Equipment Co., will, when requested, respond in the event of an emergency at the Millstone Power Station, in the following areas:

Implementation Criteria/Authorities, Responsibilities

It is our understanding that, in the event of an emergency, the nuclear facility Director of Site Bmergency Operations may request services to assist in the emergency offort. Assistance should be requested by calling 860-442-0678-611.

Measures to be Provided/Limits of Actions

Our commitment for assistance is supplying breathing air in the event of an emergency at Millstone Power Station.

Information Exchange/Point of Contact at Site

Verification communications to the nuclear facility will be by telephone to the Director of Site Emergency Operations. The telephone number is unlisted. Information exchange can be provided by using the same telephone number.

Training and Drills

Since our assistance is limited to providing equipment and service, we feel that we do not need to participate in your training drills. However, we would appreciate being invited to your plant drills to observe your emergency response actions, and to meet your emergency personnel.

This letter of agreement shall remain in effect until cancellation by either party, provided on ninety (90) days prior written notice, and shall be reviewed and certified as needed.

Sincerel

Michael Kirchhoff President

cc: David A. Smith, Emergency Preparedness Planning Services Department, Millstone

FAX (860) 444-7395

FIRE & SAFETY EQUIPMENT www.shipmans.com

Email: info@shipmans.com

Millstone Station Emergency Plan Revision 57 August 2018



STATE OF CONNECTICUT DEPARTMENT OF EMERGENCY SERVICES & PUBLIC PROTECTION OFFICE OF THE COMMISSIONER

November 14, 2014

Stephen E. Scace, Site Vice President Dominion Nuclear Connecticut Millstone Station Rope Ferry Road, RT 156 Waterford, CT 06385

Dear Mr. Scace:

This letter is to confirm that personnel and equipment from the Department of Emergency Services and Public Protection will, when requested, respond in the event of an emergency at the Millstone Power Station.

This response is submitted in accordance with the State of Connecticut Radiological Emergency Response Plan.

Sincerely,

Smil

Dora B. Schriro COMMISSIONER

cc: William P. Shea, Deputy Commissioner Col. Brian Meraviglia, Deputy Commissioner

> 1111 Country Club Road Middletown, CT 06457 Phone: (860) 685-8000 / Fax: (860) 685-8354 An Affirmative Action/Equal Opportunity Employer

November 13, 2017

TELEDYNE BROWN ENGINEERING Everywhereyoulook" 2508 Quality Lane Knoxville, TN 37931

Mr. John Daugherty Site Vice President Dominion Energy Nuclear Connecticut Rope Ferry Road Waterford, CT 06385.

Reference: Emergency Services Letter of Agreement

Dear Mr. Daugherty,

This letter serves as our "Letter of Agreement" to provide assistance in the event of an emergency.

We have 16 gamma detectors and 40 gross alpha/beta proportional counters which are used for gross alpha and beta, I-131, and Sr-89 and Sr-90 counting. During an emergency we could dedicate a large portion of these detectors to provide fast turn-around analysis. Table 1 lists the types of analyses and the number of analyses that can be performed on a one-day, two-day, or three-day basis. Also listed are the types of sample media and detection sensitivities. Table 2 lists typical sample volumes required for analysis.

The following is a list of phone numbers for contacting us in case of an emergency. The numbers should be called in the order listed:

(865) 690-6819	
(865) 934-0373	(865) 621-9118 (cell)
(865) 934-0375	(865) 776-0573 (cell)
(865)934-0379	(865) 924-6041 (cell)
	(865) 690-6819 (865) 934-0373 (865) 934-0375 (865)934-0379

The agreement letter shall remain in effect until cancellation by either party, provided by a ninety (90) day prior written notice, and shall be reviewed and certified as needed.

If you need additional information, you may contact me at the above number.

Sincerely,

Keith Jeter

Laboratory Manager

Enclosure

TELEDYNE BROWN ENGINEERING Everywhereyoulook"

Emergency Analytical Services Table 1

Analysis	Matrix	Days for Analysis	Detection Level	Quantity
Gamma Scan	l-131 charcoal, Milk, Water, Other	1	.04 pCi/CmM 5 pCi/L (Cs-137) .05 pCi/g (Cs-137)	20
Tritium	Water	1	200 pCi/L	30
I-131	Water, Milk Vegetation	3 3	1.0 pCi/L .05 pCi/L	20
Gross Beta	Air Particulates	1	.01 pCi/Cu.M	80
Total Strontium	Milk, Water	2	1.0 pCi/L	20

*Based on volume of 200 Cubic Meters

Table 2

Analysis	Medium	Volume
Gamma	Water or Milk	4 Liters
	Soil	500 grams
· · ·	Vegetation	500 grams
Tritium	Water	100 ml
I-131	Milk	4 Liters
	Vegetation	500 grams
Gross beta	Air particulate	As sampled
	Water	1 Liter
•	Soil	50 grams
Total Strontium	Water or Milk	1 liter



Waterford Ambulance Service, Incorporated

August 5, 2015

Mr. John Dougherty Millstone Power Station Dominion Nuclear Connecticut Rope Ferry Road Waterford CT 06385

Dear Mr. Daugherty

This letter of agreement is to confirm that the Waterford Ambulance Service will, when called upon, respond in the event of emergencies at the Millstone Power Station complex in the following areas.

Implementation Criteria/Authorities, Responsibilities

It is our understanding that, in the event of an emergency, the Millstone Shift Manager/Director of Station Emergency Operations or designee will request ambulance services to assist in the emergency operations. Assistance should be requested by calling the Waterford Emergency Communications Center (911), or by other means provided.

Measures to be Provided/Limit of Action. Responsibilities

Our commitment is to provide emergency medical services to personnel who might be injured or become ill at the Millstone Power Station Complex. In the event of a large scale incident or hostile action based event, we will coordinate with Waterford Fire Service and with the Waterford Police Department in accordance with standard operating guidelines and within the Incident Command System.

Information Exchange/Points of Contact

Verification of communication to the site may be by telephone to the Control Room or emergency operations facility.

Training and Drills

We would appreciate and welcome notification of the plant drills or additional training which you feel would be advantageous to us.

Please do not hesitate to contact me should you have any question or concerns

Sincerely,

Steven D. Garvin

President, Waterford Ambulance Service

Copies distributed David Smith, Manager, Millstone Emergency Preparedness Department Daniel Steward, First Selectman, Town of Waterford Lt. Stephan Bellos, Waterford Police Department/ Emergency Management Director

204 Boston Post Road, P.O. Box 137, Waterford Connecticut 06385



WATERFORD, CT 06355-2880

August 6, 2015

Mr. John Dougherty Millstone Power Station - Dominion Nuclear Connecticut Rope Ferry Road Waterford CT 06385

FIFTEEN ROPE FERRY ROAD

Dear Mr. Daugherty

This letter is to confirm that personnel and equipment for the Waterford Fire Service will, when requested, respond in the event of an emergency at Millstone Power Station.

Implementation Criteria/Authorities, Responsibilities

It is our understanding that, in the event of an emergency, the Millstone Shift Manager/Director of Station Emergency Operations / designee may request personnel and equipment to handle the emergency. Assistance should be requested by calling the Waterford Emergency Communications Center (911), or by other means that may be provided.

Measures to be Provided/Limits of Actions

Our commitment for assistance is to respond to the best of our ability with personnel and equipment in the event of a fire emergency or a rescue at Millstone Power Station Complex and attempt to control the situation with the resources that may be available. We will request the assistance of regional and state assets as needed. In the event of a large scale incident or hostile action based event, we will coordinate establishment of Incident Command with the Waterford Police Department, regional, state and federal assets.

Information Exchange/Points of Contact

Verification of communication to the nuclear facility will be by telephone to the Control Room or Director of Station Emergency Operations/Designee.

Training and Drills

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We would appreciate advanced notification of the plant drills or additional training which you feel would be advantageous to us. This notification should also include any additional security requirements that are being implemented at the Millstone nuclear facility,

This letter of agreement shall remain in effect until cancellation by either party, provided on 90 days prior to written notice, and shall be reviewed and certified as needed.

Sincerely,

Bruce A. Miller Director of Fire Services

cc:

David Smith, Manager, Millstone Emergency Preparedness Department Daniel Steward, First Selectman, Town of Waterford Lt. Stephan Bellos, Waterford Police Department/ Emergency Management Director President Steven Garvin, Waterford Ambulance Service



Brett Mahoney Chief of Police

WATERFORD POLICE DEPARTMENT 41 AVERY LANE WATERFORD, CT 06385-2819



(860) 442-9451 TEL bmahoney@waterfordct.org

September 14, 2015

Mr. John Dougherty Dominion Nuclear CT, Millstone Power Station P. O. Box 128 Waterford, CT 06385

Dear Mr. Dougherty:

This letter is to confirm that personnel from the Waterford Police Department shall serve as the primary law enforcement agency which, when requested, will respond to the Millstone Power Station.

In the event of an emergency, the Millstone Shift Manager/Director of Station Emergency Operations / designee may request personnel and equipment from the Waterford Police Department by utilizing the established hot lines within the Waterford Emergency Communication Center, calling the Waterford Emergency Communications Center (911), or by other means that may be provided.

The Waterford Police Department's commitment for assistance to provide personnel and equipment may include, but not be limited to, traffic control, security and/or tactical assistance. When assistance is requested, information will be verified by the Waterford Police Department utilizing a call back verification method, which shall be conducted by the ranking Executive Officer on duty. In addition, for an event such as a hostile action based event the Waterford Police Department may establish incident command, request regional, state and federal assistance and be the initial staging area for incidents involving outside law enforcement agencies.

The Waterford Police Department shall be notified of all noteworthy plant drills or additional training that would be advantageous to law enforcement.

This response is in accordance with criteria as set forth in the Federal Regulations, 10 CFR, Part 73.55, "Requirements for Physical Protection of Licensee Activities in Nuclear Power Reactors Against Radiological Sabotage" and 10 CFR, Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material."

Sincerely.

Brett Mahoney -Chief of Police

cc:

David Smith, Manager, Millstone Emergency Preparedness Department Daniel Steward, First Selectman, Town of Waterford Lt. Stephen Bellos, Waterford Police Department/ Emergency Management Director

www.waterfordpolice.org



Mr. John Daugherty Site Vice president Millstone Power Station

11/27/17

Mr. Daugherty,

Per our ongoing discussion and your notification, AccuWeather will be available for telephone consultation 24 hours a day 7 days per week.

AccuWeather Meteorologists will be made available during, Incidents, Drills and Alerts to discuss the weathers potential impact to the Millstone Power Station.

This service will include the impact potential from all-weather events potentially affecting the physical location.

Additionally AccuWeather will participate in the periodic weather forecast simulations with the Millstone Power Staff.

The fee per consultation request is \$495.00 per 24-hour period. We look forward to continuing to support the Millstone Power Station.

Regards,

Lou

Louis S Seidel Director Business Development AccuWeather Enterprise Solutions 814 235 8608 Lou.Seidel@AccuWeather.com

385 Science Park Road, State College, PA 16803-2215 P 814.237.0309 F 814.238.1339 E sales@accuweather.com AccuWeather.com/EnterpriseSolutions

LaboratoriesLLC GEL

a member of The GEL Group INC

🕦 = -

PO Box 30712 Charleston, SC 29417 2040 Savage Road Charleston, SC 29407 P. 843,556,8171 F. 843,766,1178

gel.com

November 16, 2015

Mr. John Daugherty Vice President Millstone Power Station Dominion Nuclear Connecticut PO Box 128 Waterford, CT 06385

Re: Emergency Plan

Dear Mr. Daugherty:

GEL Laboratories, LLC (GEL) is providing this letter to Dominion as a commitment to provide emergency response radiochemical analysis of environmental samples to assist your organization in the event of an emergency situation or emergency drill.

Please note that in the event of an emergency, Dominion will be responsible for the sample analysis costs as well as the sample disposal costs. Prices for requested analysis will be established at the time services are requested, and analysis will be based on GEL's Standard Operating Procedures. GEL's standard terms and conditions, which are enclosed, will apply to the analysis as well.

Should you have any questions or need additional information, please call me at 843-556-8171.

Yours verv truly UDA > þ. AL.

Anna K. White Contract Manager

problem solved

City of Norwich Fire Dept. 10 North Thancs Street Norwich, Connecticut 06360



Kenneth J. &candariato Fire Chief (860) 892-6080 Fax (860) 886-2555

October 11, 2017

John Daugherty Site Vice President Millstone Power Station Dominion Nuclear CT Rope Ferry Rd. Waterford, CT 06385

Dear Mr. Daugherty:

This letter is to confirm that the Norwich Fire Department will, to the best of its ability during a station emergency, fill breathing bottles brought to the Norwich Fire Department by Dominion Nuclear Connecticut upon telephone request by its Emergency Response Operations.

The Emergency Planning Services Department at Millstone Station is responsible for any questions pertaining to this agreement. (Contact: Tom Dembek at 860-440-4223)

This agreement shall remain in effect until revised, as agreed upon by both parties, or cancelled by either party with 90 days written notice.

Sincerely,

Kenneth J. \$candariato, EFO CFEI

Kenneth J. Scandariato, EFO CFE Fire Chief

KJS/js

cc: David A. Smith, Manager Emergency Preparedness Dept., Millstone SALEM VOLUNTEER FIRE COMPANY, INC. 424 Hartford Road Salem, Connecticut 06420

(860) 859-0942 fax (860)859-2961 www.salemfireco.com

October 9, 2017

Mr. John Daugherty Vice President & Sr. Nuclear Executive Dominion Energy Nuclear Connecticut, Inc. P.O. Box 128 Waterford, CT 06385

Dear Mr. Daugherty :

This letter is to confirm that the Town of Salem and the Salem Volunteer Fire Department will, to the best of its ability, during a station emergency, fill breathing bottles brought to the Salem Volunteer Fire Station by Dominion Energy Nuclear Connecticut, Inc. upon telephone request by its Emergency Response Operations.

The Emergency Preparedness Department at Millstone Station is responsible for any questions pertaining to this agreement.

This agreement shall remain in effect until revised, as agreed upon by both parties, or cancelled by either party with 90 days written notice. Sincerely,

Eugene R. Maiorano Fire Chief Salem Volunteer Fire Department

cc: David Smith, Emergency Preparedness Department, Millstone

Appendix C

APPENDIX C

MAPS OF PLUME EXPOSURE AND INGESTION EXPOSURE EPZ, LOCATIONS OF ON-SITE AND OFF-SITE RADIOLOGICAL MONITORING STATIONS, STATION EVACUATION ROUTES



Figure C-

Millstone Station Emergency Plan Revision 57 August 2018

C-2

Figure C-2

Locations of On-Site and Off-Site Radiological Monitoring Stations

(As specified by the Radiological Effluent Monitoring and Off-Site Dose Calculation Manual)

Map of Millstone 10 Mile Emergency Planning Zone C-2 E-1 C-3 C-1 D-2 E-2 B-2 B **B-1** A-2 D-1 Plum Is

Distance	Zone	Community	
(0-2 mi)	Α	Waterford (A-1)	
24, 22		East Lyme (A-2)	
(2-5 mi)	В	East Lyme (B-1)	
		Waterford (B-2)	
		New London (B-3)	
(5-10 mi)	С	C East Lyme (C-1)	
		Montville (C-2)	
		Waterford (C-3)	
	D	Old Lyme (D-1)	
		Lyme (D-2)	
	Е	Ledyard (E-1)	
		Groton City & Town (E-2)	
	F	Fishers Island	
	N/A	Plum Island	

Figure C-3






Map of Millstone Station Evacuation Routes



C-6

APPENDIX D

SUPPORTING PROCEDURES LIST

<u>Procedure Number</u>	<u>Title</u>	Emergency Plan <u>Section(s)</u>
Emergency Plan Impler	nenting Procedures (EPIs)	
MP-26-EPI-FAP01	CR Emergency Operations	5.1
MP-26-EPI-FAP02	TSC Activation and Operation	5.2, 5.3, 7.3
MP-26-EPI-FAP03	OSC Activation and Operation	5.2, 5.3, 7.4
MP-26-EPI-FAP04	EOF Activation and Operation	5.2, 5.2.14, 5.2.16, 5.3, 7.2
MP-26-EPI-FAP05	State Emergency Operation Center (EOC) Activation and Operation	5.2, 5.2.1.4, 5.2.1.6, 5.3
MP-26-EPI-FAP06	Classification and PARs	4, 5.2.1, 6.2, 5.2.5
MP-26-EPI-FAP07	Notification and Communications	5.1, 6.1
MP-26-EPI-FAP08	Evacuation and Assembly	6.4.1
MP-26-EPI-FAP09	Radiation Exposure Control	6.4, 6.5
MP-26-EPI-FAP10	Dose Assessment	6.2.1, 6.2.3
MP-26-EPI-FAP11	Core Damage Assessment	6.2.4
MP-26-EPI-FAP12	Thermal Hydraulic Evaluation	5.2.18, 5.3.13
MP-26-EPI-FAP14	Recovery	9.0
MP-26-EPI-FAP15	Common Forms	N/A
MP-26-EPI-FAP16	Innsbrook Corporate Support Center	5.4
MP-26-EPI-FAP18	Offsite Incident Command Post (ICP) Activation and Operation	N/A
Emergency Plan Admin	istrative Procedures	
MP-26-EPA-FAP01	Management Program for Maintaining Emergency Preparedness	7.0, 8.0
MP-26-EPA-FAP05	Emergency Planning Facility Maintenance	7.0, 7.5
MP-26-EPA-FAP08	Public Alerting System Administration	8.2
MP-26-EPA-FAP09	Public Alerting System Test and Maintenance	8.2
MP-26-EPA-GDL05	Emergency Response Data System (ERDS) Change Process	N/A
MP-26-EPA-GDL06	OFIS	7.1, 7.2, 7.3
MP-26-EPA-REF01	Millstone Unit 1 Defueled Emergency Action Level (EAL) Basis Document	N/A
MP-26-EPA-REF02	Millstone Unit 2 Emergency Action Level (EAL) Basis Document	N/A
MP-26-EPA-REF03	Millstone Unit 3 Emergency Action Level (EAL) Basis Document	N/A
MP-26-EPA-REF04	Off-Site Programs	8.0
MP-26-EPA-REF08B	Millstone Emergency Planning Resource Book	8.2.1

Procedure Number	Title	Emergency Plan <u>Section(s)</u>
Fleet Procedures	10 CER 50 E4(a) Change Evolution	NI/A
EP-AA-102	Revision and Control of Emergency Plan, Emergency Action Levels (Technical Basis and Matrix), and Reference Manual	N/A
EP-AA-103	Emergency Preparedness Performance Indicators	N/A
EP-AA-104	Emergency Preparedness Steering Committee	N/A
EP-AA-105	Emergency Preparedness Department Staff Training	N/A
EP-AA-303	Equipment Important to Emergency Response	Various
EP-AA-400	Drill and Exercise Program	8.2
EP-AA-505	B.5.b Program	N/A
EP-AA-600	Emergency Plan Offsite Interfaces	N/A
EP-AA-601	Emergency Press Releases	N/A
EP-AA-3001	Cyclic and Prompted Emergency Preparedness Tasks	8.0
Nuclear Training Proced	ures	
TR-AA-TPG-2300	Millstone Fire Protection Program, Training Program Guide	8.1.3.b.
TR-AA-TPG-2400	Emergency Plan Training Program Guide	8.1.1
Radiation Protection/Rac	liation Monitoring	
RP-AA-163	Inspection and Inventory of Respiratory Protection Equipment	Various
REMP Section 2.1	Sample Identification and Transmittal to the Contractor Analyses	6.2.4
REMP Section 2.6	Terrestrial Biota Sampling	6.2.4
REMP Section 2.4	Soil Sampling	6.2.4
REMP Section 2.7	Terrestrial Water Sampling	6.2.4
RPM Section 4.8.5	Emergency Radiological Equipment Maintenance and Inspection	Various
REMODCM	Radiological Effluent Monitoring and Off-Site Dose Calculation Manual	Figure C-2, Appendix H Table H-2

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Appendix D

Procedure Number	Title	Emergency Plan <u>Section(s)</u>
Millstone Unit-2 Sever	e Accident Management Guidelines (SAMG)	k. L
SAMG 4211	Phase 1 Initial Diagnosis	5.2.2, 5.1.3, 5.3.12
SAMG 4212	Phase 2 Verification of Diagnosis	5.2.2, 5.1.3, 5.3.12
SAMG 4213	Phase 3 CHLA Implementation	5.2.2, 5.1.3, 5.3.12
SAMG 4214	Phase 4 Restorative Actions	5.2.2, 5.1.3, 5.3.12
SAMG 4215	Calculational Aids	5.2.2, 5.1.3, 5.3.12
EDMG 2.01	MP2 B.5.b Event Initial Response	5.2.2, 5.1.3, 5.3.12
EDMG 2.02	MP2 B.5.b Event TSC Response	5.2.2, 5.1.3, 5.3.12
Millstone Unit-3 Sever	e Accident Management Guidelines (SAMG)	
SACRG-1	Severe Accident CR Guideline Initial Response	5.2.2, 5.1.3, 5.3.12
SACRG-2	Severe Accident CR Guideline for Transients after TSC is Activated	5.2.2, 5.1.3, 5.3.12
SACRG-3	Severe Accident CR Guideline for MP3 B.5.B Initial Event Response	5.2.2, 5.1.3, 5.3.12
SAG-1	Injection into the Steam Generators	5.2.3, 5.3.12
SAG-2	Depressurize the RCS	5.2.3, 5.3.12
SAG-3	Inject into RCS	5.2.3, 5.3.12
SAG-4	Inject into Containment	5.2.3, 5.3.12
SAG-5	Reduce Fission Product Releases	5.2.3, 5.3.12
SAG-6	Control Containment Conditions	5.2.3, 5.3.12
SAG-7	Reduce Containment Hydrogen	5.2.3, 5.3.12
SAG-8	Flood Containment	5.2.3, 5.3.12
SAG-9	Severe Accident CR Guideline for MP3 B.5.B TSC Event Response	5.2.3, 5.3.12
SCG-1	Mitigate Fission Product Release	5.2.3, 5.3.12
SCG-2	Depressurize Containment	5.2.3, 5.3.12
SCG-3	Control Hydrogen Flammability	5.2.3, 5.3.12
SCG-4	Control Containment Vacuum	5.2.3, 5.3.12
SAEG-1	TSC Long Term Monitoring	5.2.3, 5.3.12

Procedure Number	Title	Emergency Plan <u>Section(s)</u>
SAEG-2	SAMG Termination	5.2.3, 5.3.12
CA-1	RCS Injection to Recover Core	5.2.3, 5.3.12
CA-2	Injection Rate for Long-Term Decay Heat Removal	5.2.3, 5.3.12
CA-3	Hydrogen Flammability in Containment	5.2.3, 5.3.12
CA-4	Volumetric Release Rate from Vent	5.2.3, 5.3.12
CA-5	Containment Water Level and Volume	5.2.3, 5.3.12
CA-6	RWST Gravity Drain	5.2.3, 5.3.12
CA-7	Hydrogen Impact when Depressurizing Containment	5.2.3, 5.3.12
DFC	TSC Diagnostic Flow Chart	5.2.3, 5.3.12
SCST	Severe Challenge Status Tree	5.2.3, 5.3.12
Common Operating P	ocedures	
C OP 200.2	Response to Security Events	6.4.1
C OP 200.2AIR	Airborne Threat	6.4.1
C OP 200.3	Response to Medical Emergencies	6.5.4, 6.5.5
C SP 600.1	Paging Evacuation Alarm System Operability Test	8.2.1
C SP 600.2	Communications-ENRS/ARCOS and Callback Monthly Operability Test	8.2.1
C SP 600.3	State Police and Waterford Police Radio Systems Operability Test	8.2.1
C SP 600.4	Communication- Radiopaging and ENRS/ARCOS Practice Test	8.2.1
C SP 600.20	Communications-Emergency Response Data System ERDS Quarterly Operability Test	8.2.1
Chemistry Department	Procedures	
CP 3804K	PASS RCS/RSS Sample (Unit 3)	N/A
CP 3804AC	Liquid Waste Sample Sink (Unit 3)	N/A
CP 3804L	PASS Containment Air Sample (Unit 3)	N/A
CP 3804M	PASS Ventilation Samples (Unit 3)	N/A
CP 2804L	Unit 2 Reactor Coolant and Liquid Waste PASS	N/A
CP 2804M	Unit 2 Vent and Containment Air PASS	N/A

APPENDIX E

MILLSTONE EMERGENCY EQUIPMENT

Appendix E

Figure E-1

Millstone Emergency Equipment Summary⁽⁶⁾

Emergency Item	Control Room	TSC/ OSC	NAP/ SAP	Ambulance Kit	EOF	RMT Kit ¹	RMT Kit ²
Radiological Monitoring Equipment:							
RM-14 Frisker (or equivalent)	U3	X	Х		Х		
RO-2A Survey Meter (or equivalent)		X			х	X	X
ASP-1 / HP-270 (or equivalent)	X				Х		X
Teletector (or equivalent)	X	X			Х		
Air Sampler- 110 vac			X		X	X ⁽⁷⁾	
Air Sampler- 12 vdc					· X	X ⁽⁷⁾	x
Area Radiation Monitor		X			Х		
L-2241-2/HP-210 (or equivalent)	U2				Х	X	x
Cont. Air Monitor (AMS-3 or equiv.)					X		
Portal Monitor			(4)		X		
lodine Sampling Materials	(5)	X	X	÷	Х	X	X
On-Site RMT Kit (locations)	X	Х	X		X	(5)	(5)
Off-Site RMT Kit (locations)	· ·				X ⁽²⁾	(5)	(5)
Emergency Dosimetry	x	X	(5)	Х	Х	Х	X
Protective Equipment / Materials ³ :							
Respirators	Х	X	X		Х	(5)	(5)
SCBA	x	x			Fire Fac		
Protective Clothing	x	X	X	×	Х		
Personnel Decontamination Material	x			Х	X		
Facility Rad Control / Decon Material		X			X		
Potassium lodide Tablets	U2, U3	X	X		Х	X	X
Communications Equipment ³ :							
Dedicated Telephone Lines	U2, U3	X			Х		
Emergency Radios	X	X			Х		
Satellite Phones	U2, U3	X			Х		
Emergency Supplies / Materials ³ :							
Emergency Preparedness Procedures	X	X	X		Х	X	X
RMT Vehicles					X ⁽²⁾		
Tools, Lights, Office Supplies	(3)	X	-		Х		

(1) On-Site RMT Kit

(2) Off-Site RMT Kit

(3) Additional tools and equipment can be obtained from tool cribs located in U2/U3. ERF items maintained in accordance with EP procedures.

(4) Permanently installed at this location.

(5) RMT kit resupply equipment is stored at this location.

(6) HP materials and equipment are maintained and surveilled in accordance with the site Radiation Protection Manual. Detailed inventory of other equipment is provided in MP-26-EPA-FAP05, EP Facility Maintenance.)

(7) 110v - RMT1 (U2,3 CR) TSC/OSC 12v - NAP/SAP over water

Appendix F

APPENDIX F

DIAGRAMS AND ARRANGEMENT OF EMERGENCY FACILITIES

Figure F-1

Diagram of TSC / OSC Layout



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Figure F-2





Entrance





Drawing not to scale-

APPENDIX G

CROSS-REFERENCE TO NUREG-0654 CRITERIA

Planning Standard	Summary of Planning Standard	Plan Cross Reference (Section or Item)			
A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL)					
A.1.a	Identify State, Local, Federal and private organizations who are part of emergency plans.	1.1, 1.2, Table 1-1, Figure 1-1, Appendix B, Table 2-1			
A.1.b	Each organization shall specify its concept of operations and relationship to total effort.	Sections 1, 5, 6, 9			
A.1.c	Illustrate relationships by block diagram.	Figures 1-2, 5-1, 7-1a, b, c			
A.1.d	Title of individual in charge of emergency operations.	5.2.1, Figure 5-1			
A.1.e	Provide for 24 hr./day emergency response and manning of communications.	Section 5.0			
A.2.a	Specify functions and responsibilities for major elements and key individuals by title.	N/A- State and Local requirement only.			
A.2.b	Each plan shall contain the legal basis for such authorities.	N/A- State and Local requirement only.			
A.3	Include written letters of agreement. Include concept of operations, emergency measures to be provided, criteria for implementation and exchange of information.	5.4.1, 5.4.2, Appendix B			
A.4	Title of individual responsible for assuring continuity of resources.	5.2.17, 5.4.3			
B. ON-SITE	EMERGENCY ORGANIZATION				
B.1	Relationship between on-site emergency organization and normal staff.	Table 5-1			
B.2	Specify title of emergency coordinator who is on-site 24-hr./day.	5.1.1, Table 5-1			
B.3	Line of succession for emergency coordinator. Specify conditions for high level officials assuming this function.	5.1.1, 5.2.1, 5.2.5			
B.4	Specify functional responsibilities of emergency coordinator. Specify responsibilities which cannot be delegated (e.g., may not delegate the decision to notify and to recommend protective actions to authorities).	5.1.1, 5.2.1			
B.5	Specify title and corresponding qualifications of emergency personnel. Include Table B-1, "Minimum Staffing Requirements for Nuclear Power Plant Emergencies." Specify minimum on shift and available within 30 minutes and 60 minutes following declaration of emergency.	Table 5-1			
B.6	Specify interfaces between on-site and off-site organizations. Illustrate in block diagram.	1.2, Figures 1-1, 1-2, 1- 3, 5-1			
B.7	Specify corporate organization. Provide a table similar to B-1.	5.0, Table 5-1, Figure 5-1			
B.7a	Logistics support for emergency personnel	5.2.17			
B.7b	Technical support for planning, reentry, recovery	Section 9			
B.7c	Management interface with government authorities	6.1, Figures 7-1a, c			
B.7d	Release of information to news media	5.2.14, 5.2.16			

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Planning Standard	Summary of Planning Standard	Plan Cross Reference (Section or Item)
B.8	Specify private organizations and contractors who would provide assistance.	5.4
B.9	Specify services to be provided by local agencies. Include transportation and treatment of injured personnel who may be contaminated.	6.3.1, 6.4.1.b, 6.5.5, 6.5.6
B.9	Append letters of agreement with contractor, local, and private agencies which include authorities, responsibilities, and limits of actions.	7.10, Appendix B
C. EMERGI	ENCY RESPONSE SUPPORT AND RESOURCES	
C.1	Make arrangements with DOE for FRMAP/RAP assistance.	1.2, 1.4
C.1.a	Specify persons by title authorized to request federal assistance.	1.4, 5.4.3
C.1.b	Specify federal resources expected, including expected times of arrival at specific nuclear facility sites.	1.4, 5.4.3
C.1.c	Specify resources available to support the federal response.	1.4, 5.4.3
C.2.b	Licensee may dispatch a representative to principal off-site governmental EOCs.	5.2.15, 5.2.16
C.3	Identify radiological laboratories, capabilities, and expected availability.	7.10, Table H-2, Appendix B, Table H-1
C.4	Identify facilities, organizations, and individuals which can be relied upon in an emergency	Table H-2, Appendix B
D. EMERGE	ENCY CLASSIFICATION SYSTEM	
D.1	Establish EAL scheme per Appendix 1.	Section 4, Table 4-1, 4- 2, 4-3 4-4, Appendix I
D.2	Initiating conditions shall include the example conditions in Appendix 1 and accidents in the FSAR.	Section 4, Table 4-1, 4- 2, 4-3 4-4, Appendix I
E. NOTIFIC	ATION METHODS AND PROCEDURES	
E.1	Establish procedures for notification of response organizations consistent with Appendix 1. Provide verification of messages.	1.3, 6.1
E.2	Establish procedures for notifying, alerting, and mobilizing emergency response personnel.	6.1
E.3	Initial emergency message shall include: class of emergency, whether a release is taking place, potentially affected areas, whether protective measures may be necessary.	6.1
E.4	Provide for follow-up messages. Includes the 14 listed items.	1.3, 6.1, 6.2.1, 6.2.2
E.6	Establish administrative and physical means and the time required to notify public in plume EPZ per Appendix 3. Licensee will ensure means exist. Responsibility of State and Local governments to activate the system.	1.5, 6.1
E.7	Provide written messages intended for the public, consistent with the operator's classification. Role of the licensee is to provide supporting information for the messages.	1.3, 1.5, 6.2.2, 7.7, 8.4

Planning Standard	Summary of Planning Standard	Plan Cross Reference (Section or Item)				
F. EMERGE	F. EMERGENCY COMMUNICATIONS					
F.1	Identify organizational titles and alternates for communications links. Establish primary and backup communications.	1.3, 6.1, Figures 7-1a, b, c, 7.9, Appendix B				
F.1.a	Provide 24-hr./day notification and activation and 24-hr./day manning of communications links.	5.1.4, 6.1				
F.1.b	Provide communications with contiguous State/Locals within the Emergency Planning Zones.	6.1, Figure 7-1a				
F.1.c	Provide communications with Federal Emergency Response Organizations.	Figure 7-1b, 7-1c				
F.1.d	Provide communications between State and Local centers, and field assessment teams.	1.3, 6.1, 7.2.5, Figure 7-1a, 7-1c				
F.1.e	Provide for alerting and activating emergency personnel.	6.1				
F.1.f	Provide communications to NRC Headquarters, NRC Regional Office EOC, EOF, and RMT assembly area.	Figure 7-1b, 7-1c				
F.2	Ensure that coordinated communication links for fixed and mobile medical support facilities exists.	7.9				
F.3	Periodic testing of communications systems.	8.2.1, 8.2.1.b, 8.2.2				
G. PUBLIC	INFORMATION	<u> </u>				
G.1	Provide periodic information at least annually to public concerning public notification and protective actions in an emergency including the special needs of the handicapped.	1.6, 8.4, 8.5				
G.2	Information must reach population within plume EPZ and should include written material that would likely be available in an emergency. Updated information should be disseminated annually. Notices to refer the transient populations to the sources of local information.	1.6, 8.4				
G.3.a	Provide point of contact and physical location for use by news media.	7.7				
G.3.b	Provide space for a limited number of news media at EOF.	7.7.				
G.4.a	Designate a spokesperson.	5.2.15				
G.4.b	Arrange for timely exchange of information among spokesperson.	Figure 1-1, 5.2.14, 5.2.15, 5.2.16, 6.1, 6.6				
G.4.c	Coordinate arrangements for dealing with rumors.	5.2.14				
G.5	Conduct informational programs for news media at least annually.	8.5				
H. EMERGE	H. EMERGENCY FACILITIES AND EQUIPMENT					
H.1	Establish TSC and OSC per NUREG-0696	7.3, 7.4, Appendix E, F				
H.2	Establish EOF per NUREG-0696	7.2, Appendix E, F				
H.4	Provide for activating and staffing facilities in a timely manner.	Section 5, Table 5-1, 6.1				
H.5	Provide on-site monitoring systems to be used to initiate emergency measures per Appendix 1, including:	Table H-1				
Н.5.а	Geophysical	Table H-1				

Planning Standard	Summary of Planning Standard	Plan Cross Reference (Section or Item)
H.5.b	Radiological	6.2.3, Table H-1, Figure C-2
H.5.c	Process	Table H-1
H.5.d	Fire	Table H-1
H.6	Provide off-site monitoring equipment including:	
H.6.a	Geophysical	Table H-2
H.6.b ⁻	Radiological	Figures C-2, Table H-2
H.6.c	Laboratory facilities	7.10, Table H-1, H-2
H.7	Provide off-site radiological monitoring equipment.	Appendix E, Table H-2
H.8	Provide meteorological instrumentation and procedures per Appendix 2. Obtain meteorological information from other sources.	7.13, Table H-1, H-2
H.9	Provide on-site Operational Support Center (assembly area) with adequate capacity and supplies.	7.4, Figures F-2, F-3
H.10	Provide for inspection, inventory and operational checking of equipment at least once each calendar quarter and after each use. Have sufficient reserves of equipment to replace that which was removed from emergency kits for calibration or repair. Calibrate equipment per suppliers recommended intervals.	7.5, Appendix E, Appendix D
H.11	In appendix, provide inventory of emergency kits.	Appendix E
H.12	Establish central point for receipt and analysis of field monitoring data (preferably associated with EOF) and coordination of sample media.	6.2.3, 7.10, Table H-1, H-2
I. ACCIDEN	IT ASSESSMENT	
1.1	Provide EALs and corresponding emergency class.	Section 4, Tables 4-1, 4-2, 4-3, 4-4 and Appendix I
1.2	On-site capabilities to provide initial values and continuing assessment (per NUREG-0578 and NRC letter of 10/30/79) including:	N / A
Cont'd	Post-accident sampling capability	Appendix D
Cont'd	Radiation and effluent monitors	Table H-1
Cont'd	In-plant iodine instrumentation	Table H-1
Conť'd	Containment radiation monitors	Table H-1
1.3	Establish methods and techniques for determining:	N/A
l.3.a	Source term (e.g., relation of containment radiation monitors and material available for release.)	6.2.3, Appendix D
l.3.b	Magnitude of release based on plant parameters and effluent monitors.	6.2.3, Appendix D
1.4	Establish relationship between effluent monitor readings and exposures and contamination for meteorological conditions.	6.2.3, Appendix D, 6.2.4.c

Planning Standard	Summary of Planning Standard	Plan Cross Reference (Section or Item)
1.5	Acquire meteorological information per Appendix 2. Provide meteorological data to EOF, TSC, CR, and off-site NRC center. Make available to the State suitable meteorological data processing interconnections.	6.2.3, 6.2.4.d, 7.13
1.6	Determine release rate/projected doses if instruments are off- scale or inoperable.	6.2.3, 6.2.4
1.7	Field monitoring within plume EPZ.	6.2.3, 6.2.4.h
1.8	Provide for rapid assessment of radiological hazards. For field teams include: activation, notification, composition, transportation communication, monitoring equipment and deployment times.	6.2.3, 6.2.4.h, Appendix D
1.9	Have capability to detect radio-iodine in air as low as 10-7 μ Ci/cc.	6.2.3, 6.2.4.h.4
I.10	Relate measured parameters to dose rates. Estimate integrated dose from dose rates and compare to PAGs.	6.2.3, 6.2.4.c, 6.2.4.e
J. PROTEC	TIVE RESPONSE	
J.1	Establish means and time to warn individuals in owner-controlled areas.	6.4.1
J.2	Provide evacuation routes and transportation for on-site individuals to off-site locations, including alternatives.	6.4.1
J.3	Provide radiological monitoring for people evacuated from the site.	6.4.1.i
J.4	Provide evacuation of on-site non-essential personnel in Site Area or General Emergency. Provide decontamination capability near off-site location.	6.4.1.d, 6.4.1.i
J.5	Account for all individuals on-site and ascertain names of missing individuals within 30 minutes. Account for all individuals continuously thereafter.	6.4.1.d, 6.4.1.h
J.6	Provide for individuals remaining or arriving on-site, respiratory protection, protective clothing, radioprotective drugs.	6.4.3, 6.4.4, 5.2.2, 5.2.5
J.7	Establish a mechanism for recommending protective actions to state/local authorities per EALs of Appendix 1 and Tables 2.1 and 2.2 of the EPA PAGs.	1.3, 6.2.1, 6.2.2, 6.2.3, Figure 1-1, Table 4-4
Cont'd	Provide prompt notification to off-site authorities in plume EPZ as specified in NUREG-0654, Appendix 1.	Section 4, Tables 4-1, 4-2, 4-3, 4-4, 6.1, Figures 7-1a, b, c
J.8	Time estimates for evacuation in plume EPZ in accordance with Appendix 4.	Appendix J
J.10	Plans for protective measures to include:	
J.10.a	Maps	Appendix C
J.10.b	Population distribution	Appendix J
J.10.c	Means for notifying population	1.5, 6.1
J.10.m	Public protective strategies from plume exposure.	6.2.1

Planning Standard	Summary of Planning Standard	Plan Cross Reference (Section or Item)				
K. RADIOL	K. RADIOLOGICAL EXPOSURE CONTROL					
K.1	Establish on-site exposure guidelines for:					
K.1.a	Removal of injured persons	6.5				
K.1.b	Corrective actions	6.5				
K.1.c	Assessment actions	6.5				
K.1.d	First aid	6.5				
K.1.e	Personnel decontamination	6.5				
K.1.f	Ambulance service	6.5				
K.1.g	Medical treatment	6.5				
K.2	Provide on-site emergency radiation protection programs. Specify individual (s) who can authorize exposure in excess of 10CFR20 limits.	5.1, 5.2.1, 5.2.2, 5.2.5, 6.4, Table 6-1				
Cont'd	Provide procedures for volunteers to receive radiation exposures in lifesaving activities.	5.1, 5.2.1, 6.4				
K.3.a	Provide 24-hr./day dose determination	6.4				
K.3.b	Maintain dose records and read dosimeters at appropriate frequencies.	6.4				
K.5.a	Levels for decontamination	6.4				
K.5.b	Establish means for radiological decontamination of personnel, supplies, equipment, and waste disposal.	6.4.3				
K.6	Provide on-site contamination control, including:					
K.6.a	Area access control	5.2.2, 5.2.4, 5.2.5, 6.4.1, 6.4.3				
K.6.b	Drinking water and food supplies	6.4.3.c				
K.6.c	Criteria for permitting return of areas and items to normal use in accordance with ANSI 13.12	6.4.3				
K.7	Capability to decontaminate relocated on-site personnel, including extra clothing and decontaminates (particularly for radio-iodine contamination).	6.5.3				
L. MEDICA	L. MEDICAL AND PUBLIC HEALTH SUPPORT					
L.1	Describe hospital and medical services, including preparations to handle contaminated individuals.	6.5.4, 6.5.5, 6.5.6, Appendix B				
L.2	Provide on-site first-aid capability.	6.5.4, 7.11				
L.4	Arrange for transporting patients of radiological accidents to medical facilities.	6.5.5				

Planning Standard	Summary of Planning Standard	Plan Cross Reference (Section or Item)			
M. RECOVERY AND REENTRY PLANNING AND POST-ACCIDENT OPERATIONS					
M.1	Develop general plans and procedures for recovery and means by which decisions are made to relax protective actions.	Section 9			
M.2	Specify position/title, authority, and responsibility for key positions in the recovery organization.	Section 9, Figure 9-1			
M.3	Means to inform personnel that recovery is to be initiated and changes in organization.	Section 9			
M:4	Method of periodically estimating total population exposure.	6.2.3, 9.2.5			
N. EXERCI	SES AND DRILLS				
N.1.a	Conduct an exercise as set forth in NRC and FEMA rules.	8.2.2.f			
N.1.b	Include mobilization of state and local resources. Provide for critique by Federal and State evaluators	8.2.2			
N.2	Conduct drills, in addition to the annual exercise, at the frequencies indicated.	8.2			
N.2.a	Communication drills (Quarterly), FEMA - IP State	8.2			
N.2.b	Fire drills - per technical specifications	8.2			
N.2.c	Medical drills - annually to include contaminated individual, ambulance, and off-site medical help. (Off-site portions may be part of annual exercise).	8.2			
N.2.d	Radiological monitoring - annually (include collection and analysis of sample media).	8.2			
N.2.e	Health Physics - semi-annually to include simulated elevated environmental samples; analyze actual in-plant liquid samples with elevated radiation levels.	8.2			
N.3	Describe the conduct of drills and exercises.	8.2			
N.4	Official observers from Federal/State/Local governments critique exercises. Hold critiques. Formal evaluation based on critiques.	8.2.2.g			
N.5	Establish means and management control for incorporating observer's comments into plan and implementing corrective actions.	8.2.2			
O. RADIOL	OGICAL EMERGENCY RESPONSE TRAINING				
0.1	Make provisions for training appropriate individuals.	8.1			
0.1.a	Provide training to off-site organizations	8.1.2			
0.2	Training for on-site organization to include drills in which individuals demonstrate abilities. On-the-spot corrections to be made and instructor to show proper performance.	8.2			
O.3	First-aid teams trained in courses equivalent to Red Cross Multi- Media.	6.5.4			
O.4	Establish training programs, including initial training and retraining. Specify scope, nature, and frequency for:				
0.4.a	Directors and coordinators	8.1.1			
O.4.b	Personnel responsible for accident assessment	8.1.1			

Planning Standard	Summary of Planning Standard	Plan Cross Reference (Section or Item)
0.4.c	Radiological monitoring teams	8.1.1, 8.1.2
0.4.d	Police, security, and fire-fighting personnel	8.1.2
0.4.e	On-site repair and damage control/corrective action teams	8.1.1
0.4.f	First aid and rescue personnel	8.1.1, 8.1.2
O.4.g	Local support services	8.1.2
Ó.4.h	Medical support personnel	8.1.2, 8.1.3
0.4.i	Licensee's headquarters support personnel	8.1.1
O.4.j	Personnel responsible for transmission of emergency information instructions.	8.1
O.5	Provide initial and annual retraining of personnel.	8.1.1
P. RESPON	ISIBILITY FOR THE PLANNING EFFORT	
P.1	Train individuals responsible for planning effort.	Section 8
P.2	Identify by title, individual with overall authority and responsibility for radiological emergency response planning.	Section 8
P.3	Designate Emergency Planning Coordinator.	Section 8
P.4	Review and certify plan annually. Update plans as needed. Incorporate changes identified by drills and exercises.	8.3
P.5	Forward plans and approved changes to responsible individuals and organizations. Revised pages shall be dated and marked to show where changes have been made.	8.3
P.6	Each plan shall contain a detailed list of supporting plans and their source.	Section 2, Table 2-1
P.7	In appendix, list, by title, procedures required to implement the plan, including sections of the plan to be implemented by procedures.	Appendix D
P.8	Include specific table of contents and index.	Table of Contents
Cont'd	Cross reference to NUREG-0654 criteria	Appendix G
P.9	Conduct independent reviews at least every 12 months and include:	8.3
Cont'd	Plan, procedures, practices, training, readiness, testing, equipment and interfaces with State and Local governments.	8.3
Cont'd	Include management controls for implementation and correction of audit findings.	8.3
Cont'd	Document reports to management and involved Federal, State and Local organizations. Retain for 5 years.	8.3
P.10	Provide for updating telephone numbers in emergency procedures at least quarterly.	8.2.1.a

APPENDIX H

RADIOLOGICAL ASSESSMENT EQUIPMENT AND FACILITIES

<u>Fu</u>	nctional System	Instrument Detector	Individual Applicability
1.	Geophysical Monitors		
	Meteorological Tower	4 Wind speed indicators	Monitor wind speed at 33', 142', 374', and 447' elevations
		4 Wind direction indicators	Monitor wind direction at 33', 142', 374', and 447' elevations
		3 Delta temp. sensors	Monitor temp. difference between 33' and 142' 33' and 374' 33' and 447'
	Meteorological Mast	1 Wind speed indication	Monitor wind speed at 33'.
		1 Wind direction indicator	Monitor wind direction at 33'.
	Time History Accelerographs	Containment base slab (Unit 2)	Record ground accelerations with respect to time
		Auxiliary building	и п
		Intake structure	a u
		Free field	п и .
	Peak Accelerographs	Containment base slab	Record peak ground accelerations
		Steam generator support	n u
		Pressurizer support	u u
		Safety injection tank support	n n
	Seismic Trigger	Containment base slab	Activate an annunciator
	Response Spectrum Recorder	Containment base slab	Records ground accelerations
Ι.	Radiological Monitors	•	
	Unit 1 Process Monitors	RM-SFPI-02	Measure gaseous activity
	Unit 2 Process Monitors	RM8123A Containment recirculation air particulate	Monitor particulate activity
		RM8123B Containment recirculation air gaseous	Monitor gaseous activity
		RM8262A Containment recirculate	Monitor particulate activity
		RM8262B Containment recirculation air gaseous	Monitor gaseous activity
		RM8434A Radwaste ventilation particulate	Monitor particulate activity
	` .	RM8434B Radwaste ventilation gaseous	Monitor gaseous activity

On-Site Assessment Equipment and Facilities

Functional System	Instrument Detector	Individual Applicability
Unit 2 Process Monitors (Cont'd)	RM8011 Control room ventilation gaseous	Monitor gaseous activity
	RM8145A Spent fuel pool ventilation particulate	Monitor particulate activity
	RM8145B Spent fuel pool ventilation gaseous	Monitor gaseous activity
	RM8997 Radwaste ventilation particulate	Monitor particulate activity
· · · ·	RM8998 Radwaste ventilation particulate	Monitor particulate activity
	RM4299 A, B & C Main steam line monitors	Measure gaseous activity
· · ·	RM8999 Radwaste ventilation particulate	Monitor particulate activity
	RM8132A Unit 2 stack discharge particulate	Monitor particulate activity
· · · ·	RM8132B Unit 2 stack discharge gaseous	Monitor gaseous activity
	RM8168A Unit 2 stack high range	Monitor high level gaseous activity
	RM8168B Unit 2 stack mid range	Monitor gaseous activity
	RM5099 Steam jet air ejector	Monitor gaseous activity
	RM9095 Waste gas storage tanks discharge gaseous	Monitor gaseous activity
	RM4262 Steam generator blowdown	Monitor liquid activity
	RM6038 Reactor building closed cooling water	Monitor liquid activity
	RM9049 Clean radwaste discharge	Monitor liquid activity
	RM9116 Aerated radwaste discharge	Monitor liquid activity
	RM9327 Condensate recovery tank	Monitor liquid activity
	2CND-RE245 Condensate polishing neutralizing sump	Monitor liquid activity
	RM-8169 Wide Range Gas Monitor	Monitors particulate and gaseous radioactivity

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Functional System	Instrument Detector	Individual Applicability
Unit 3 Process Monitors	3HVR-RE10 A & B Ventilation Vent	Monitors particulate and gaseous radioactivity
	3HVR-RE11 &12 (A&B) Auxiliary Building (lower levels)	Monitors particulate and gaseous radioactivity
-	3HVR-RE13, 14 & 15(A&B) Auxiliary Building (upper levels)	Monitors particulate and gaseous radioactivity
	3HVR-RE16 (A&B) Charging Pump Cubicle	Monitors particulate and gaseous radioactivity
· · ·	3HVR-RE17 (A&B) Fuel Building	Monitors particulate and gaseous activity
	3HVR-RE18 (A&B) Waste Building	Monitors particulate and gaseous radioactivity
	3HVR-RE19 (A&B) SLCRS	Monitors particulate and gaseous radioactivity
	3HVR-RE91 (A&B) Control Room	Monitors particulate and gaseous activity
	3HVQ-RE49 ESF Building	Monitors particulate and gaseous radioactivity
	3CMS-RE22 A&B Containment Atmosphere	Monitors particulate and gaseous radioactivity
	3HVZ-RE09 A&B Hydrogen Recombiner Cubicles Ventilation	Monitors particulate and gaseous radioactivity
	3HVC-RE16 A&B Control Building Inlet ventilation	Monitors gaseous radioactivity
	3MSS-RE75, 76, 77, 78 4 Main Steam Relief lines	Monitors gaseous radioactivity
	3ARC-RE21 Condenser Air Ejector	Monitors gaseous radioactivity
	3GWS-RE48 Hydrogenated Vent	Monitors gaseous radioactivity
	3MSS-RE79 Turbine Driven Auxiliary Feedwater Pump Discharge	Monitors gaseous radioactivity
	3SSR-RE08 Steam Generator Blowdown	Monitors liquid radioactivity
	3CCP-RE31 Reactor Plant Component Cooling	Monitors liquid radioactivity
	3CNA-RE47 Auxiliary Condensate	Monitors liquid radioactivity
	3LWS-RE70 Liquid Waste	Monitors liquid radioactivity

Table H-1

Functional System	Instrument Detector	Individual Applicability
	3DAS-RE50 Turbine Building Drains	Monitors liquid radioactivity
Unit 3 Process Monitors (Cont'd)	3LWC-RE65 Regenerant Evaporator	Monitors liquid radioactivity
Unit 1 Area Radiation Monitors	RM-SFPI-01	Monitor Radiation Levels
Unit 2 Area Radiation Monitors	RM-7892 Drumming and decontamination area	Measure radiation levels
	RM-7894 Engineered safeguards systems area	Measure radiation levels
	RM-7895 Sampling area	Measure radiation levels
	RM-7896 Radioactive waste gas processing area	Measure radiation levels
	RM-7899 Control room	Measure radiation levels
	RM-8139 Spent fuel pool (south wall)	Measure radiation levels
	RM-8142 Spent fuel pool (north wall)	Measure radiation levels
	RM-8156 Spent fuel pool (north wall)	Measure radiation levels
	RM-8157 Spent fuel pool (south wall)	Measure radiation levels
	RM-8240 Containment High Radiation	Measure radiation levels
	RM-8241 Containment High Radiation	Measure radiation levels
	2-RMS-9813 Drumming area	Measure radiation levels
	2-RMS-9799A Control Room ventilation air supply	Measure radiation levels
	2-RMS-9799B Control Room Ventilation air supply	Measure radiation levels
	2-RMS-04 (not in use) CPF- solid waste	Measure radiation levels
	2-RMS-05 (not in use) CPF- Condensate demineralizers	Measure radiation levels
	2-RMS-06 (not in use) CPF- Access area	Measure radiation levels
	2-RMS-08 (not in use) CPF- Evaporator	Measure radiation levels

Table H-1

Functional System	Instrument Detector	Individual Applicability
Unit 3 Area Radiation Monitors	3RMS-RE01 Manipulator Crane 51'4'' Containment	Measure radiation levels
	3RMS-RE02 Fuel Transfer Tube51'4" Containment	Measure radiation levels
	3RMS-RE03 In-Core Inst. Trans. 24'6" Containment	Measure radiation levels
	3RMS-RE04A Containment HR Internal 51'4" Containment	Measure radiation levels
	3RMS-RE05A Containment HR Internal 51'4" Containment	Measure radiation levels
	3RMS-RE06 Decontamination Area 24'6" Fuel Bldg.	Measure radiation levels
	3RMS-RE07 Calibration Room 66'6" Auxiliary Bldg.	Measure radiation levels
	3RMS-RE08 Spent Fuel Pit/Hoist 52'4" Fuel Bldg.	Measure radiation levels
	3RMS-RE09 Aux. Bldg. General (A) 18'6" Aux. Bldg.	Measure radiation levels
	3RMS-RE10 Aux. Bldg. General (B) 4'6'' Aux. Bldg.	Measure radiation levels
	3RMS-RE11 Aux. Bldg. General (C) 4'6" Aux. Bldg.	Measure radiation levels
	3RMS-RE12 Aux. Bldg. General (D) 24'6" Aux. Bldg.	Measure radiation levels
	3RMS-RE13 Aux. Bldg. General (E) 24'6'' Aux. Bldg.	Measure radiation levels
	3RM-RE14 Aux. Bldg. General (F) 24'6'' Aux. Bldg.	Measure radiation levels
	3RMS-RE15 Aux. Bldg. General (G) 43'6'' Aux. Bldg.	Measure radiation levels
	3RMS-RE16 Aux. Bldg. General (H) 43'6'' Aux. Bldg.	Measure radiation levels
	3RMS-RE17 Waste Disp: Bldg.	Measure radiation levels
	3RMS-RE18 Waste Disp. Bldg. 4′6'' Waste Bldg.	Measure radiation levels
· .	4RMS-RE19 Solid Waste Storage 24'6" Waste Bldg.	Measure radiation levels
	3RMS-RE20 Sample Room 43'6" Aux. Bldg.	Measure radiation levels

<u> </u>	unctional System	Instrument Detector	Individual Applicability
•		3RMS-RE21 Service Bldg. Laboratory 24'6" Service Bldg.	Measure radiation levels
	Unit 3 Area Radiation Monitors (Cont'd)	3RMS-RE22 Control Room Monitor 47'6" Control Bldg.	Measure radiation levels
		3RMS-RE24 Waste Disposal Bldg. (C) 24'6'' Waste Disp. Bldg.	Measure radiation levels
		3RMS-RE25 Waste Disposal Bldg. (D) 24'6". Waste Disp Bldg.	Measure radiation levels
		3RMS-RE28 Fuel Bldg. Pipe Rack 11'0 Fuel Bldg.	Measure radiation levels
		3RMS-RE29 Spent Fuel Cask Area 52'4" Fuel Bldg.	Measures radiation levels
		3RMS-RE31 Fuel Transfer Tube 24'6" Containment	Measures radiation levels
		3RMS-RE32 Containment Air Compressor 24'6" Containment	Measure radiation levels
		3RMS-RE33 RHR Cubicle "A" (Normal Range) 4'6" ESF Bldg.	Measure radiation levels
		3RMS-RE34 RHR Cubicle "B" (Normal Range) 4'6" ESF Bldg.	Measure radiation levels
	-	3RMS-RE35 In-Core Inst. Thimble Area 3'8" Containment	Measure radiation levels
		3RMS-RE36 Fuel Pool Monitor 52'4" Fuel Bldg.	Measure radiation levels
		3RMS-RE37 Condensate Demin. Area 14'6" Cond. Polishing Bldg.	Measure radiation levels
		3RMS-RE38 Regeneration Area 38'6" Cond. Polishing Bldg.	Measure radiation levels
		3RMS-RE41 Fuel Drop Monitor 51'4" Containment	Measure radiation levels
		3RMS-RE42 Fuel Drop Monitor 51'4" Containment	Measure radiation levels
		3RMS-RE52 Recombiner Control Room 24'6" Recombine Bldg.	Measure radiation levels
2.	Radiation Monitors and Sampling Equipment	Gamma spectrometers	Isotopic identification and analysis
		Geiger-Mueller survey instruments (0-1,000 R/hr range)	Measure gamma and beta radiation dose rate

On-Site Assessment Equipment and Facilities

Functional System	Instrument Detector	Individual Applicability
	Ionization chamber (0-1,000 R/hr range)	Measure gamma and beta radiation dose rate
	Contamination survey	Count samples for gross alpha and beta
Radiation Monitors and Sampling Equipment (Cont'd)	Air sampling equipment	Sample for airborne radionuclides (particulate, iodine, gaseous, and tritium)
	Neutron survey instrument	Measure neutron radiation dose rate
	TLD ·	Measure personnel radiation dose
	Direct reading pocket ion chamber	Measure personnel gamma radiation dose
3. <u>Fire Detection</u>	Smoke detectors	Detects products of combustion
	Rate of rise heat detector	Detects quick rise of temperature
	Fixed heat detector	Detects a set temperature
4. <u>Facilities</u>	Chemistry laboratory	Equipped for chemical and radiological analysis
	9 radiation monitoring stations	Measure gamma radiation dose
	4 Fixed air sampling stations	Sample particulates and iodines
	Health Physics Laboratory	Equipped for radiological analyses

Appendix H

Table H-2

Functional System		Instrument Detector	Individual Applicability
1.	Geophysical Monitors		
	Meteorological	Meteorological forecasting contractor for full weather forecast service	Provide current and forecast weather for Millstone area
	Seismic	United States Geological Survey (USGS) for Strong motion recorder	Record ground accelerations
2.	Radiological Monitors		
	Environmental Monitoring	As specified by REMODCM	Gamma radiation dose and sample particulates and iodines
3.	Laboratory Facilities		
	Radiochemistry laboratory	Teledyne Brown Engineering Environmental Services	Equipped for chemical and radiological analysis
4.	Facilities	GEL Environmental Laboratory	Equipped for chemical and radiological analysis
		Emergency Operations Facility	Equipped for limited radiological analyses.

APPENDIX I

EMERGENCY ACTION LEVEL SCHEME

NOTE: The EAL scheme provides an example of how the Emergency Plan meets the standards of 50.47(b) and requirements of Appendix E. The EAL Tables in the Station Emergency Assessment procedure MP-26-EPI-FAP06 are used to classify event

Millstone Unit 1 Emergency Action Levels

L	UNUSUAL EVENT I	DELTA ONE UNUSUAL EVE	ENT DELTA TWO	ALERT CHARLIE ONE		
	IN-PLANT RADIATION	SECURITY THREAT/ DESTRUCTIVE PHENOMENA	FIRE / GASES	FUEL POOL EQUIPMENT FAILURE	UNPLANNED OFFSITE RELEASES	
R	RA1 REACTOR BUILDING RADIATION (D-AA2)	TA1 SECURITY EVENT (D-HA1)			OA1 OFFSITE DOSE (D-AA1)	JA1
1	 Area radiation monitor reading in Reactor Building or survey results indicate an UNCONTROLLED increase in radiation levels by 100 mR/hr that is not the result of a planned evolution AND impedes operation of systems needed to maintain spent fuel integrity. Valid radiation monitor reading or survey results indicate greater than 15 mR/hr in areas required to be occupied 24 hours a day. 	 Any on-going or imminent security compromise to the safety of the plant. TA2 DESTRUCTIVE PHENOMENA (N/A) An event that damages systems, structures, or components needed to maintain spent fuel integrity that may result in overexposure of site personnel or results in an uncontrolled decrease in the spent fuel pool water level or damage to spent fuel. 			 Complianced release of radioactivity ≥ 3.42E-1 µCi/cc to the environment (≥200 times REMODCM release limit) for ≥15 minutes. Grab sample analyses indicate unplanned gaseous release rate ≥ 3.42E-1 µCi/cc (≥200 times the REMODCM limit) for ≥15 minutes. 	Any c indica for th areas the in substa requin Respo staffin
R	U1 REACTOR BUILDING RADIATION (D-AU2)	TU1 SECURITY EVENT (D-HU1)	GU1 FIRE (D-HU3)	EU1 FUEL POOL LEVEL (D-SU1)	OU1 UNPLANNED RELEASES (D-AU1)	JU1
A R ini 22 pl	rea radiation monitor reading in eactor Building or survey results adicate an UNCONTROLLED acrease in radiation levels by 5 mR/hr that is not the result of a lanned evolution.	 Security events as determined for Station Safeguards Contingency Plan and reported by Security Shift Supervision. A credible site-specific security threat notification. TU2 DESTRUCTIVE PHENOMENA (D-HU3) Earthquake detected per ONP 514C, Earthquake. Report of tornado striking within the Protected Area (PA) that has the potential to affect equipment needed to maintain spent fuel integrity. 	 Fire in the Reactor Building or other areas important to maintaining the integrity of the spent fuel NOT extinguished within 15 minutes of Control Room notification OR within 15 minutes of the fire alarm actuation in the Control Room. GU2 TOXIC/FLAMMABLE GASES (D-HU3) 1. Life threatening toxic gases OR flammable gas concentrations as identified in C-OP 200.5, "Oil, Hazardous Material, Hazardous Waste and Mixed Waste 	Uncontrolled decrease in fuel pool level indicated by a low level alarm actuation with all spent fuel assemblies remaining covered by water. EU2 FUEL POOL TEMPERATURE (D-SU1) Uncontrolled heatup of the spent fuel pool such that the bulk pool temperature exceeds 150°F.	 Gaseous effluent monitor ≥ 3.42E-3 µCi/cc (≥ 2 times REMODCM limits) for ≥ 60 minutes. Grab sample analyses indicate unplanned gaseous release rate ≥ 3.42E-3 µCi/cc (≥ 2 times the REMODCM limit) for ≥60 minutes. 	Any of judge or act of saf or oth maint spent
		 On-Site sustained wind speed >75 mph. Explosion or visible damage to structures, systems, or components within the Protected Area with the potential to affect equipment required to maintain the integrity of the spent fuel. 	 Waste and Mixed waste Contingency Plan," affecting activities in areas needed to maintain spent fuel integrity. Notification of a near-site release that may require evacuation of MP1. 	Re Re flo	EAS NEEDED TO MAINTAIN SPENT INTEGRITY eactor Building - 4 th and 5 th Floors eactor Building, Fuel Pool Pump Mezz for	zanine -
		 Flood Level >19 Feet Mean Sea Level. Vehicle crash within the PA that could potentially affect equipment needed to maintain spent fuel integrity. 		• H&	&V Room - Roof - Coolers	

Specific setpoints are contained in EPI-FAP06, "Classification and PARs."

•

JUDGEMENT	CLASSIFICATION
JUDGEMENT	ALERT
(D-HA2) condition for which judgment ates that the level of safety he Reactor Building or other important for maintaining ntegrity of the spent fuel is cantially degraded and which tres Station Emergency onse Organization (SERO) ing.	CHARLIE ONE Events are in progress or have occurred which indicate an actual or potential substantial degradation of the level of safety of the plant, to plant personnel, or to the safe storage of fuel in the spent fuel pool.
JUDGEMENT	UNUSUAL EVENT
(D-HU2)	DELTA TWO
condition for which ement indicates the potential tual degradation in the level fety of the Reactor Building her areas important to taining the integrity of the t fuel.	OR DELTA ONE Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant.
- 2 nd	1 Millstone

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MILLSTONE UNIT 2 EMERGENCY ACTION LEVELS

GENERAL EMERGENCY ALPHA	GENERAL EMERGENCY BRAVO	ALERT CHARLIE-ONE	UNUSUAL EVENT DELTA-TWO	UNUSUAL EVENT DELTA-ONE
BARRIER FAILURE	LOSS OF POWER	EQUIPMENT FAILURE	OFFSITE RELEASES	CLASSIFICATION
BG1 ALL THREE BARRIERS Mode 1, 2, 3, 4 See Barrier Failure Reference Table	PG1 STATION BLACKOUT Mode 1, 2, 3, 4 Loss of Voltage on Buses 24C AND 24D AND ANY of the Following: • • Restoration of Power to AT LEAST One Vital Bus is NOT Likely Within Four Hours • Core Exit Thermocouple Readings Indicate Superheat • Inadequate SG Heat Removal Capability as Indicated by SG Water Level ≤ 10% in BOTH SGs AND Inadequate Terry Turbine Feedwater Flow	EG1 ATWS/INADEQUATE COOLING Mode 1 Functional Recovery of Reactivity Control Ineffective AND EITHER of the Following: RCS Heat Removal by Steam Generator Heat Removal SFSC Criteria Can NOT Be Satisfied • Core Exit TC Temperature Readings > 800°F	OG1 OFFSITE DOSE Mode ALL 1. MP2 Kaman Vent Monitor (RM-8168) Reading ≥ 2 µCi/cc for > 15 Minutes 2. MP2 WRGM Site Stack Effluent Activity (RM-8169) Reading ≥ 30 µCi/cc for > 15 Minutes 3. MSL Monitor (RM-4299/A/B/C) Reading ≥ 2 R/hr for > 15 Minutes 3. MSL Monitor (RM-4299/A/B/C) Reading ≥ 2 R/hr for > 15 Minutes 4. Measured Plume Dose Rate OnSite ≥ 1,000 mR/hr for > 15 Minutes 5. Rad Assessment Determines Integrated Dose Offsite ≥ 1 Rem TEDE OR ≥ 5 Rem CDE Thyroid	GENERAL EMERGENCY ALPHA OR BRAVO Events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or security events that result in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.
BS1 ANY TWO BARRIERS Mode 1, 2, 3, 4 See Barrier Failure Reference Table	PS1 STATION BLACKOUT Mode 1, 2, 3, 4 Loss of Voltage on Buses 24C AND 24D > 15 Minutes PS2 LOSS OF DC Mode 1, 2, 3, 4 Loss of Voltage on DC Buses 201A AND 201B > 15 Minutes	ES1 ATWS Mode 1 Manual Reactor Trip Attempted At Panel C04 AND Reactor Is NOT Shutdown ES2 INABILITY TO MAINTAIN HOT S/D Mode 1, 2, 3, 4 1. No RCS Heat Removal Via Steam Generators AND Once Through Cooling NOT Effective AND Shutdown Cooling is NOT In Service RCS Boration Capability Unable to Eliminate Inadvertent Criticality ES3 IN-VESSEL FUEL UNCOVERY Mode 5, 6 Shutdown Cooling Has Been Lost AND ANY of the Following Conditions Exist: Alternate Methods for Restoring RCS Inventory are NOT Effective RVLMS Reading = 0% with OPERABLE #8 string (NA if no OPERABLE #8 string) Core Exit TC Temperature Readings Indicate Superheat ES4 LOSS OF ANNUNCIATORS/TRANSIENT Mode 1, 2, 3, 4 Loss of Most (75%) MCB Annunciators AND BOTH of the Following Significant Transient in Progress Loss of SPDS AND ICC Instrumentation Note 1, 2, 3, 4	OS1 OFFSITE DOSE Mode ALL 1. MP2 Kaman Vent Monitor (RM-8168) Reading ≥ 0.2 µCi/cc for > 15 Minutes 2. MP2 WRGM Site Stack Effluent Activity (RM-8169) Reading ≥ 10 µCi/cc for > 15 Minutes 3. MSL Monitor (RM-4299A/B/C) Reading ≥ 0.3 R/hr for > 15 Minutes 4. Measured Plume Dose Rate Onsite ≥ 50 mR/hr for > 15 Minutes 5. Rad Assessment Determines Integrated Dose Offsite ≥ 0.05 Rem TEDE OR ≥ 0.25 Rem CDE Thyroid	SITE AREA EMERGENCY CHARLIE-TWO Events are in process or have occurred which involve an actual or likely major failure of plant functions needed for protection of the public or security events that result in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) prevents effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exeed EPA Protective Action Guideline exposure levels beyond the site boundary.
BA1 FUEL CLAD OR RCS BARRIER Mode 1, 2, 3, 4 See Barrier Failure Reference Table . BA2 STEAM LINE BREAK Mode 1, 2, 3, 4 Unisolable Steam Line Break Outside CTMT	PA1 STATION BLACKOUT Mode 5, 6, 0 Loss of Voltage on Buses 24C AND 24D > 15 Minutes PA2 SINGLE AC POWER SOURCE Mode 1, 2, 3, 4 Only One AC Power Source Available to Supply Buses 24C AND/OR 24D > 15 Minutes Such That Loss of That Power Source Would Result in a Station Blackout (Unit 3 Buses 34A/B CANNOT be Credited unless already aligned to Unit 2 Bus 24C or 24D)	EA1 AUTOMATIC RX TRIP FAILURE Mode 1, 2 Failure of Automatic Reactor Trip AND Manual Trip Was Successful EA2 INABILITY TO MAINTAIN COLD S/D Mode 5, 6 1. Uncontrolled RCS Temperature Increase > 10°F That Results in RCS Temperature > 200°F 2. 2. Inadvertent Criticality Mode 1, 2, 3, 4 Loss of Most (75%) MCB Annunciators > 15 Minutes AND EITHER of the Following: • Significant Transient in Progress • I loss of SPDS AND ICC Instrumentation	OA1 OFFSITE DOSE Mode ALL 1. MP2 Kaman Vent Monitor (RM-8168) Reading ≥ 0.02 µCi/cc for > 15 Minutes 2. MP2 WRGM Site Stack Effluent Activity (RM-8169) Reading ≥ 1 µCi/cc for > 15 Minutes 3. MSL Monitor (RM-4299A/B/C) Reading ≥ 0.03 R/hr for > 15 Minutes 4. Measured Plume Dose Rate Onsite ≥ 5 mR/hr for > 15 Minutes 5. Rad Assessment Determines Integrated Dose Offsite ≥ 0.005 Rem TEDE OR ≥ 0.025 Rem CDE Thyroid	ALERT CHARLIE-ONE Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of intentional malicious dedicated efforts of a hostile act. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.
BU1 CTMT BARRIER Mode 1, 2, 3, 4 See Barrier Failure Reference Table BU2 RCS LEAKAGE Mode 1, 2, 3, 4 1. Pressure Boundary Leakage > 10 GPM Mode 1, 2, 3, 4 2. Unidentified Leakage > 10 GPM 3. Identified Leakage > 25 GPM 4. Primary to Secondary Leakage >25 GPM BU3 FUEL CLAD DEGRADATION Mode ALL 1. RCS Activity > 60 µCi/gm I-131 DEQ 2. Dose Rate at One Foot from Unpressurized RCS Imple $\ge 2 \text{ mR/hr/ml}$	PU1 LOSS OF OFFSITE POWER Mode ALL Loss of all OFFSITE power to buses 24C AND 24D for > 15 Minutes. PU2 LOSS OF DC Mode 5, 6 PU2 LOSS OF DC Mode 5, 6 Loss of Voltage on DC Buses 201A AND 201B > 15 Minutes classification; also always read from top to bottom in each category.	EU1 LOSS OF COLD S/D FUNCTION Mode 5, 6 1. Loss of Shutdown Cooling > 15 Minutes AND Refuel Pool Water Level < 35 Ft., 6 In.	OU1 UNPLANNED RELEASE Mode ALL Effluent Monitors in Alarm OR Unplanned, Unmonitored or Uncontrolled Offsite Release AND DELTA-TWO Posture Code Limits as Determined from EPI-FAP06, "Classification and PARs," Exceeded. Note: Effluent Monitors Indicate Release Above Alarm Setpoint Continuing > 60 minutes and Reportability Evaluations NOT Complete	UNUSUAL EVENT DELTA-TWO OR DELTA-ONE Events are in process or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs. 2 2 1 2 1 1 1 1 1 1 1 1

MILLSTONE UNIT 2 EMERGENCY ACTION LEVELS

GENERAL EMERGENCY ALPHA	NERAL EMERGENCY BRAVO	ALERT CHARLIE-ONE	UNUSUAL EVENT DELTA-TWO	UNUSUAL EVENT DELTA-ONE
IN-PLANT RADIATION	SECURITY THREAT/ DESTRUCTIVE PHENOMENA	FIRE/GASES	JUDGEMENT	CLASSIFICATION
RG1 MAJOR FUEL DAMAGE Mode ALL 1. RM-8240/8241 Reading > 1,200 R/hr . 2. At Least 20% Fuel Clad Damage As Determined By Core Damage Estimate . 3. Spent Fuel is Exposed from Water Loss from Open Vessel, Cavity, Or SF Pool AND BOTH of the Following: . . Spent Fuel Has Decayed < 30 Days	TG1 SECURITY EVENT Mode ALL A HOSTILE FORCE has taken control of plant equipment such that plant personnel are unable to operate equipment required to maintain safety functions. Any of the following meet this EAL: 1. Loss of Control Room 2. Loss of Hot Shutdown Panel (C-21) (West 480v SWGR Room) 3. Loss of Cold Shutdown Panel (C-10) (Upper 4160v SWGR Room) 4. Security reports the loss or imminent loss of a Target Set OR OR A HOSTILE ACTION has caused failure of Spent Fuel Cooling Systems and IMMINENT (for EALs) fuel damage is likely for a freshly off–loaded reactor core in pool.		JG1 JUDGEMENT Mode ALL Other Conditions Exist For Which Judgement Indicates: 1. 1. Actual Or Imminent Substantial Core Degradation With Potential For Loss Of Containment, <u>OR</u> 2. 2. Potential For Uncontrolled Radiological Releases. These Releases Can Be Reasonably Expected To Exceed EPA PAG Plume Exposure Levels Outside The Site Boundary	GENERAL EMERGENCY ALPHA OR BRAVO Events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or security events that result in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.
RS1 SPENT FUEL DAMAGE Mode ALL Spent Fuel is Exposed from Open Vessel or Cavity AND BOTH of the Following: • Spent Fuel Has Decayed < 30 Days	TS1 SECURITY EVENT Mode ALL A notification from the site security force that an armed attack, explosive attack, airliner impact, or other HOSTILE ACTION is occurring or has occurred within the protected area.	GS1 CONTROL ROOM EVACUATION Mode ALL Unit Control from Hot Shutdown Panel C-10 Or C-21 NOT Established Within 15 Minutes After Control Room Evacuation	JS1 JUDGEMENT Mode ALL Other Conditions Exist For Which Judgement Indicates Actual Or Likely Major Failures of Plant Functions Needed For Protecton Of The Public For Protecton Of The Public For Protecton Of The Public	SITE AREA EMERGENCY CHARLIE-TWO Events are in process or have occurred which involve an actual or likely major failure of plant functions needed for protection of the public or security events that result in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) prevents effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exeed EPA Protective Action Guideline exposure levels beyond the site boundary.
 BA1 SPENT FUEL ASSEMBLY DAMAGE Mode ALL Spent Fuel is Exposed from Open Vessel, Cavity, or SF Pool AND Spent Fuel Has Decayed ≥ 30 Days Fuel Handling Accident Causing Damage to Spent Fuel, Indicated by Fuel Building OR Containment Radiation Monitors Increasing RA2 PLANT RADIATION Mode ALL Radiation Readings > 15 mR/hr in Control Room OR Central Alarm Station <u>OR</u> Secondary Alarm Station Radiation Reading > 5 R/hr in Areas Requiring Access for Safe Shutdown 	TA1 SECURITY EVENT Mode ALL 1. Security Events as determined for Station Safeguards Contingency Plan and reported by Security Shift Supervision. (Addresses events that involve Actual or Potential Substantial degradation to the level of safety of the plant.) 2. A notification from the site security force that an armed attack, explosive attack, airliner impact, or other HOSTILE ACTION is occurring or has occurred within the OCA. 3. A validated notification from the NRC of an airliner attack threat less than 30 minutes away. TA2 DESTRUCTIVE PHENOMENA Mode ALL 1. Seismic Event > 0.09g ZPA Mode ALL 2. Onsite Sustained Windspeed > 90 MPH Wisible Damage to Structures or Equipment AND Affecting Safe Shutdown 4. Vessel or Vehicle Collision AND Affecting Safe Shutdown Missiles Affecting Safe Shutdown 5. Missiles Affecting Safe Shutdown Flooding Affecting Safe Shutdown	GA1 CONTROL ROOM EVACUATION Mode ALL Control Room Evacuation Initiated Mode ALL GA2 FIRE/EXPLOSION Mode ALL Fire or Explosion Affecting Safe Shutdown Area AND Damage to Structures <u>OR</u> Safe Shutdown Equipment Indicated. Mode ALL GA3 TOXIC/FLAMMABLE GASES Mode ALL Life Threatening Toxic Gases <u>OR</u> Flammable Gas Concentrations as Identified in C – OP 200.5, "Oil, Hazardous Material, Hazardous Waste and Mixed Waste Contingency Plan" Affecting Areas for Safe Shutdown	JA1 JUDGEMENT Mode ALL Any Condition For Which Judgement Indicates That Safety Systems May Be Degraded <u>AND</u> Which Requires Emergency Response Organization Staffing	ALERT CHARLIE-ONE Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of intentional malicious dedicated efforts of a hostile act. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.
RU1 RAD MONITORS Mode ALL 1. Uncontrolled Refuel Pool Water Level Decrease AND Rad Levels Require Evacuation of CTMT or Spent Fuel Pool Area 2. 2. Unexpected Area Rad Monitor Reading Offscale High OR > 1000 Times Normal Reading > 1000 Times Normal Reading	TU1 SECURITY EVENT Mode ALL 1. Security Condition as determined for Station Safeguards Contingency Plan and reported by Security Shift Supervision. (Addresses events that involve Potential degradation in the level of safety of the plant.) 2. A credible site specific security threat notification. 3. A validated notification from the NRC providing information of an aircraft threat. TU2 DESTRUCTIVE PHENOMENA Mode ALL 1. Seismic Activity Detected Per AOP-2562, Earthquake 2. Report by Plant Personnel of Tornado Striking Within Protected Area 3. Visible Damage to Structures or Equipment Within the Protected Area 4. Onsite Sustained Windspeed > 75 MPH 5. Explosion Within the Protected Area 6. Turbine Failure Causing Observable Casing Damage 7. Vessel or Vehicle Collision With Structures OR Equipment Required for Safe Shutdown or a loaded ISFSI Confinement Boundary 8. Flood Level > 19 Feet Mean Sea Level 9. Flooding in Areas Containing Safe Shutdown Equipment	GU1 FIRE Mode ALL 1. Fire in Building OR Areas Adjacent to Areas Needed for Safe Shutdown NOT Extinguished Within 15 Minutes of Notification OR Verification of Control Room Alarms 2. 2. Fire Affecting a Loaded ISFSI Confinement Boundary NOT Extinguished Within 15 Minutes of Notification. Mode ALL GU2 TOXIC/FLAMMABLE GASES Mode ALL 1. Life Threatening Toxic Gases OR Flammable Gas Concentrations as Identified in C-OP 200.5, "Oil, Hazardous Material, Hazardous Waste and Mixed Waste Contingency Plan" Affecting Normal Operation 2. Notification of a Near-Site Release That May Require Evacuation AREAS OF CONCERN Control Room Cable Vaults Turbine Building Penetration Areas RBCCW Rooms Diesel Generator Room Charging Pump Cubicles Switchyard	JU1 JUDGEMENT Mode ALL Any Condition For Which Judgement Indicates Potential Degradation in the Level of Safety of the Plant FOR SAFE SHUTDOWN Switchgear Rooms Intake Structure Switchgear Area Coolant Tanks Area Containment DC Equipment and Battery Rooms Safety Injection Pump Rooms	UNUSUAL EVENT DELTA-TWO OR DELTA-ONE Events are in process or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs. 2 2 1 2 1 1 1 1 1 1 1 1

MILLSTONE 2 EMERGENCY ACTION LEVELS BARRIER FAILURE REFERENCE TABLE

IMMINENT ·	No Turnaround in Safety System Performa	nce is Expected AND Escalation to General Em	ergency Conditions Will Occur Within 2 Hou	urs
ICATORS	FUEL CLAD BARRIER	RCS BARRIER	CTMT BARRIER	
SAFETY FUNCTION STATUS/ FUNCTIONAL RECOVERY	FCB1 LOSS Not Applicable POTENTIAL LOSS P No RCS Heat Removal Via Steam Generators AND Once Through Cooling NOT Effective AND Shutdown Cooling System Is NOT In Service	RCB1 LOSS Not Applicable POTENTIAL LOSS Uncontrolled RCS Cooldown AND RCS Pressure-Temperature To the Left Of the PTS Limit 200°F Subcooling Maximum Curve P No RCS Heat Removal Via Steam Generators AND Once Through Cooling NOT Effective AND Shutdown Cooling System Is NOT In Service		L CL/
CORE EXIT TC TEMPERATURES	FCB2 LOSS L Core Exit Thermocouple Readings > 1200 °F POTENTIAL LOSS P Core Exit Thermocouple Readings > 700 °F	RCB2 LOSS L RCS Subcooling < 30°F	CNB1 LOSS Not Applicable POTENTIAL LOSS P Core Exit TC Temperature Readings >1200°F AND Do NOT Decrease Within 15 Minutes	
PRESSURE		RCB3 LOSS Not Applicable POTENTIAL LOSS P Uncontrolled RCS Pressure Decrease and Increasing Containment Radiation Monitors	CNB2 LOSS L Rapid Unexplained CTMT Pressure Decrease Following Initial Increase L No CTMT Pressure Increase When Expectation Exists POTENTIAL LOSS P AND No Containment Spray Pump P CTMT H₂ Concentration ≥ 4%	
COOLANT LEAKAGE		RCB4 LOSS Reactor Coolant Leak > CVCS Capacity AND Entry Into EOP-2534, Steam Generator Tube Rupture or EOP 2540, Functional Recovery, to Address Steam Generator Tube Rupture POTENTIAL LOSS P Reactor Coolant Leak > CVCS Capacity AND Entry Into EOP-2525, Standard Post Trip Actions P Reactor Coolant Leak > CVCS Capacity AND Entry Into EOP-2525, Standard Post Trip Actions P Reactor Coolant Leak Rest < CVCS Capacity AND EITHER of the following:	CNB3 LOSS L Primary to Secondary > Tech Spec Limits and EITHER exists: • Nonisolable Steam Release from Affected S/G to environment • Prolonged Release From Affected S/G to Environment • Prolonged Release From Affected S/G to Environment • Prolonged Release From Affected S/G to Environment When Used for Cooldown (see basis for description of prolonged release) L Leakage Through BOTH Isolation Valves <u>AND</u> a Pathway to the Environment Exists Requiring Actions Outside the Control Room to Isolate POTENTIAL LOSS P Leakage Exists Outside CTMT Requiring Isolation From inside the Control Room <u>AND</u> EITHER of the following: • Entry Into EOP 2532, Loss of Coolant Accident • Entry Into EOP 2540, Functional Recovery, to Address Loss of Coolant Accident	CL
RADIATION	FCB3 LOSS L RM-8240/8241 Reading > 300 R/hr L RM-8240/8241 Reading > 5 R/hr Without RCS Release Inside CTMT L At Least 5% Fuel Clad Damage As Determined By Core Damage Estimate <u>OR</u> Sample System Dose Rates Obtained Using CP 2802N, "Primary System Sampling Analysis" L Dose Rate at One Foot from Unpressurized RCS Sample ≥ 28 mR/hr/ml POTENTIAL LOSS Not Applicable	RCB5 LOSS L RM-8240/8241 Reading > 5 R/hr Without Fuel Clad Barrier Loss POTENTIAL LOSS Not Applicable	CNB4 LOSS ❑ Offsite Dose Plume Rate ≥ 10 ⁻⁶ Times RM-8240/8241 Reading if Release is to CTMT POTENTIAL LOSS P RM-8240/8241 Reading > 1,200 R/hr P At Least 20% Fuel Clad Damage As Determined By Core Damage Estimate	
WATER LEVEL	FCB4 LOSS Not Applicable POTENTIAL LOSS P RVLMS Reading = 0% with OPERABLE #8 string (NA if no OPERABLE #8 string)		CNB5 LOSS L No CTMT Sump Level Increase When Expectation Exists POTENTIAL LOSS Not Applicable	CLAI
JUDGEMENT	FCB5 Any Condition For Which Judgement Indicates Loss or Potential Loss of Fuel Clad Barrier Due to: Imminent Barrier Degradation Based On Current Safety System Performance Degraded Fission Barrier Monitoring Capability Making Barrier Status Indeterminate	RCB6 Any Condition For Which Judgement Indicates Loss or Potential Loss of RCS Barrier Due to: Imminent Barrier Degradation Based On Current Safety System Performance Degraded Fission Barrier Monitoring Capability Making Barrier Status Indeterminate	CNB6 Any Condition For Which Judgement Indicates Loss or Potential Loss of CTMT Barrier Due to: Imminent Barrier Degradation Based On Current Safety System Performance Degraded Fission Barrier Monitoring Capability Making Barrier Status Indeterminate	Mii Re Au



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MILLSTONE UNIT 3 EMERGENCY ACTION LEVELS

GENERAL EMERGENCY ALPHA	NERAL EMERGENCY BRAVO	EMERGENCY NO	UNUSUAL EVENT DELTA-TWO	UNUSUAL EVENT DELTA-ONE
BARRIER FAILURE	LOSS OF POWER	EQUIPMENT FAILURE	OFFSITE RELEASES	CLASSIFICATION
BG1 ALL THREE BARRIERS Mode 1, 2, 3, 4 See Barrier Failure Reference Table	PG1 STATION BLACKOUT Mode 1, 2, 3, 4 Loss of Voltage on Buses 34C AND 34D (Station Blackout Diesel cannot be credited) AND ANY of the Following: • • Restoration of Power to AT LEAST One Bus is NOT Likely Within Four Hours • • Core Cooling - RED • • Heat Sink - RED AND Required Feedwater Flow Can NOT be Established Within 15 minutes	EG1 ATWS/INADEQUATE COOLING Mode 1 Reactor Power > 5% Following Entry into FR-S.1 AND EITHER of the Following: • • Core Cooling - RED • All SG Wide Range Levels < 21% (24% Adverse CTMT)	$\begin{tabular}{ c c c c c c c c c c c c c c c c c c c$	GENERAL EMERGENCY ALPHA OR BRAVO Events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or security events that result in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.
BS1 ANY TWO BARRIERS Mode 1, 2, 3, 4 See Barrier Failure Reference Table	PS1 STATION BLACKOUT Mode 1, 2, 3, 4 Loss of Voltage on Buses 34C AND 34D > 15 Minutes (Station Blackout Diesel cannot be credited) 15 Minutes PS2 LOSS OF DC Mode 1, 2, 3, 4 Loss of Voltage on DC Buses 1, 2, 3 AND 4 > 15 Minutes	ES1 ATWS Mode 1 FR-S.1 is Entered Directly From E-0 ES2 INABILITY TO MAINTAIN HOT S/D Mode 1, 2, 3, 4 1. Heat Sink - RED AND BOTH of the Following: • Required Feedwater Flow Can NOT Be Established Within 15 Minutes • RCS Bleed and Feed Can NOT Be Established Mode 1, 2, 3, 4 2. RCS Boration Capability Unable to Eliminate Inadvertent Criticality ES3 IN-VESSEL FUEL UNCOVERY Mode 5, 6 RHR Has Been Lost <u>AND</u> ANY of the Following Conditions Exist: • Alternate Methods for Restoring RCS Inventory Are NOT Effective RVLMS Reading Decreasing Toward 19% Level (Plenum) with OPERABLE 19% sensor (NA if no OPERABLE 19% sensor) • CET Readings Indicate Superheat Conditions ES4 LOSS OF ANNUNCIATORS/TRANSIENT Mode 1, 2, 3, 4 Loss of Most (75%) MCB Annunciators <u>AND</u> BOTH of the Following: • Significant Transient in Progress Loss of SPDS AND ICC Instrumentation	OS1 OFFSITE DOSE Mode ALL 1. MP3 Ventilation Vent Monitor (3HVR*RE10) Reading ≥ 0.1 μCi/cc for > 15 Minutes 2. MP3 SLCRS Monitor (3HVR*RE19) Reading ≥ 10 μCi/cc for > 15 Minutes 3. MP3 Safeties or Steam Dump Monitor (3MSS-RE75/76/77/78) Reading ≥ 0.8 μCi/cc for > 15 Minutes 4. Terry Turbine Monitor (3MSS-RE79) Reading ≥ 1 μCi/cc for > 15 Minutes 4. Terry Turbine Monitor (3MSS-RE79) Reading ≥ 1 μCi/cc for > 15 Minutes 5. Measured Plume Dose Rate Onsite ≥ 50 mR/hr for > 15 Minutes 6. Rad Assessment Determines Integrated Dose Offsite ≥ 0.05 Rem TEDE OR ≥ 0.25 Rem CDE Thyroid 0.05	SITE AREA EMERGENCY CHARLE-TWO Events are in process or have occurred which functions needed for protection of the public or security events that result in intentional damage or malicious acts; (1) toward site personnel or (2) prevents effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exeed EPA Protective Action Guideline exposure levels beyond the site boundary.
BA1 FUEL CLAD OR RCS BARRIER Mode 1, 2, 3, 4 See Barrier Failure Reference Table BA2 STEAM LINE BREAK Mode 1, 2, 3, 4 Unisolable Steam Line Break Outside CTMT	PA1 STATION BLACKOUT Mode 5, 6, 0 Loss of Voltage on Buses 34C AND 34D > 15 Minutes PA2 SINGLE AC POWER SOURCE Mode 1, 2, 3, 4 Only One AC Power Source Available to Supply Buses 34C AND/OR 34D > 15 Minutes Such That Loss of That Power Source Would Result in a Station Blackout (Station Blackout Diesel CANNOT be Credited)	EA1 AUTOMATIC RX TRIP FAILURE Mode 1, 2 Failure of Automatic Reactor Trip AND Manual Trip Was Successful EA2 INABILITY TO MAINTAIN COLD S/D Mode 5, 6 1. Uncontrolled RCS Temperature Increase > 10 ° F That Results in RCS Temperature > 200 ° F 2. Inadvertent Criticality EA3 LOSS OF ANNUNCIATORS/TRANSIENT Loss of Most (75%) MCB Annunciators > 15 Minutes AND EITHER of the Following: • Significant Transient in Progress • Loss of SPDS AND ICC Instrumentation	OA1 OFFSITE DOSE Mode ALL 1. MP3 Ventilation Vent Monitor (3HVR*RE10) Reading ≥ 0.01 µCi/cc for > 15 Minutes Reading ≥ 1 µCi/cc for > 15 Minutes 2. MP3 SLCRS Monitor (3HVR*RE19) Reading ≥ 1 µCi/cc for > 15 Minutes Image: Algorithm of the second state of t	ALERT CHARLIE-ONE Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of intentional malicious dedicated efforts of a hostile act. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.
BU1 CTMT BARRIER Mode 1, 2, 3, 4 See Barrier Failure Reference Table BU2 RCS LEAKAGE Mode 1, 2, 3, 4 I. Pressure Boundary Leakage > 10 GPM Mode 1, 2, 3, 4 2. Unidentified Leakage > 10 GPM 3. Identified Leakage > 25 GPM BU3 FUEL CLAD DEGRADATION Mode ALL 1. RCS Activity > 60 μCi/gm I-131 DEQ 2. Dose Rate at One Foot from Unpressurized RCS Sample ≥ 1 mR/hr/ml	PU1 LOSS OF OFFSITE POWER Mode ALL Loss of all OFFSITE power to buses 34C AND 34D for > 15 Minutes PU2 LOSS OF DC Mode 5, 6 Loss of Voltage on DC Buses 1, 2, 3 AND 4 > 15 Minutes	EU1 LOSS OF COLD S/D FUNCTION Mode 5, 6 1. Loss of RHR Cooling > 15 Minutes AND Valid PZR Water Level (LT 462) Reading < 40%	OU1 UNPLANNED RELEASE Mode ALL Effluent Monitors in Alarm OR Unplanned, Unmonitored or Uncontrolled Offsite Release AND DELTA-TWO Posture Code Limits as Determined from EPI-FAP06, "Classification and PARs," Exceeded. Note: Effluent Monitors Indicate Release Above Alarm Setpoint Continuing > 60 minutes AND Reportability Evaluations NOT Complete	UNUSUAL EVENT DELTA-TWO OR DELTA-ONE Events are in process or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs. Base Structure Structure Structure Base Struct
MILLSTONE UNIT 3 EMERGENCY ACTION LEVELS

GENERAL EMERGENCY ALPHA GEI	NERAL EMERGENCY BRAVO \Box SITE AREA EM CHARLIE-TWO	ALERT CHARLIE-ONE	UNUSUAL EVENT DELTA-TWO	UNUSUAL EVENT DELTA-ONE
IN-PLANT RADIATION	SECURITY THREAT/ DESTRUCTIVE PHENOMENA	FIRE/GASES	JUDGEMENT	CLASSIFICATION
RG1 MAJOR FUEL DAMAGE Mode ALL 1. Sustained Valid RE04A/05A Reading > * R/hr. Reading is Considered Sustained Valid When the Effects of TIC have dissipated. 2. At Least 20% Fuel Clad Damage As Determined By Core Damage Estimate 3. Spent Fuel is Exposed from Water Loss from Open Vessel, Cavity, Or SF Pool AND BOTH of the Following: Spent Fuel Has Decayed < 30 Days Release Can Bypass CTMT 	TG1SECURITY EVENTMode ALLA HOSTILE FORCE has taken control of plant equipment such that plant personnel are unable to operate equipment required to main- tain safety functions. Any of the following meet this EAL:1.Loss of Control Room2.Loss of Remote Shutdown Panel3.Security reports the loss or imminent loss of a Target Set ORA HOSTILE ACTION has caused failure of Spent Fuel Cooling Systems and IMMINENT (for EALs) fuel damage is likely for a freshly off-loaded reactor core in pool.		JG1 JUDGEMENT Mode ALL Other Conditions Exist For Which Judgement Indicates: 1. Actual Or Imminent Substantial Core Degradation With Potential For Loss Of Containment, OR 2. Potential For Uncontrolled Radiological Releases. These Releases Can Be Reasonably Expected To Exceed EPA PAG Plume Exposure Levels Outside The Site Boundary	GENERAL EMERGENCY ALPHA OR BRAVO Events are in process or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or security events that result in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.
RS1 SPENT FUEL DAMAGE Mode ALL Spent Fuel is Exposed from Open Vessel, or Cavity AND BOTH of the Following: • Spent Fuel Has Decayed < 30 Days	TS1 SECURITY EVENT Mode ALL A notification from the site security force that an armed attack, explosive attack, airliner impact, or other HOSTILE ACTION is occurring or has occurred within the protected area.	GS1 CONTROL ROOM EVACUATION Mode ALL Unit Control from Auxiliary Shutdown Panel NOT Established Within 15 Minutes After Control Room Evacuation	JS1 JUDGEMENT Mode ALL Other Conditions Exist For Which Judgement Indicates Actual Or Likely Major Failures of Plant Functions Needed For Protecton Of The Public	SITE AREA EMERGENCY CHARLIE – TWO Events are in process or have occurred which involve an actual or likely major failure of plant functions needed for protection of the public or security events that result in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) prevents effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exeed EPA Protective Action Guideline exposure levels beyond the site boundary.
 RA1 SPENT FUEL ASSEMBLY DAMAGE Mode ALL Spent Fuel is Exposed from Open Vessel, Cavity <u>OR</u> SF Pool AND Spent Fuel Has Decayed ≥ 30 Days Uel Handling Accident Causing Damage to Spent Fuel, Indicated by Fuel Building <u>OR</u> Containment Radiation Monitors Increasing RA2 PLANT RADIATION Mode ALL Radiation Readings > 15 mR/hr in Control Room <u>OR</u> Central Alarm Station <u>OR</u> Secondary Alarm Station Radiation Reading > 5 R/hr in Areas Requiring Access for Safe Shutdown 	TA1 SECURITY EVENT Mode ALL 1. Security Events as determined for Station Safeguards Contingency Plan and reported by Security Shift Supervision. (Addresses events that involve Actual or Potential Substantial degradation to the level of safety of the plant.) 2. A notification from the site security force that an armed attack, explosive attack, airliner impact, or other HOSTILE ACTION is occurring or has occurred within the OCA. 3. A validated notification from the NRC of an airliner attack threat less than 30 minutes away. TA2 DESTRUCTIVE PHENOMENA Mode ALL 1. Seismic Event > 0.09g ZPA Mode ALL 2. Onsite Sustained Windspeed > 90 MPH Mode ALL 3. Visible Damage to Structures or Equipment AND Affecting Safe Shutdown Missiles Affecting Safe Shutdown 6. Flooding Affecting Safe Shutdown Flooding Affecting Safe Shutdown	GA1 CONTROL ROOM EVACUATION Mode ALL Control Room Evacuation Initiated Mode ALL GA2 FIRE/EXPLOSION Mode ALL Fire or Explosion Affecting Safe Shutdown Area AND Damage to Structures OR Safe Shutdown Equipment Indicated. Mode ALL GA3 TOXIC FLAMMABLE GASES Mode ALL Life Threatening Toxic Gases OR Flammable Gas Concentrations as Identified in C-OP 200.5, Oil, Hazardous Material, Hazardous Waste and Mixed Waste Contingency Plan Affecting Areas for Safe Shutdown	JA1 JUDGEMENT Mode ALL Any Condition For Which Judgement Indicates That Safety Systems May Be Degraded And Which Requires Emergency Response Organization Staffing	ALERT CHARLIE-ONE Events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of intentional malicious dedicated efforts of a hostile act. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.
RU1 RAD MONITORS Mode ALL 1. Containment OR Fuel Building Area Rad Monitor Alarms Indicate Cavity Seal Failure Unexpected Rad Monitor Reading Offscale High OR > 1000 Times Normal Reading 2. Unexpected Rad Monitor Reading Offscale High OR > 1000 Times Normal Reading .	TU1 SECURITY EVENT Mode ALL 1. Security Condition as determined for Station Safeguards Contingency Plan and reported by Security Shift Supervision. (Addresses events that involve Potential degradation in the level of safety of the plant.) 2. 2. A credible site specific security threat notification. 3. A validated notification from the NRC providing information of an aircraft threat. TU2 DESTRUCTIVE PHENOMENA Mode ALL 1. Seismic Activity Detected Per AOP-3570, Earthquake 2. 2. Report by Plant Personnel of Tornado Striking Within Protected Area 3. Visible Damage to Structures or Equipment Within the Protected Area 4. 4. Onsite Sustained Windspeed > 75 MPH 5. 5. Explosion Within the Protected Area 6. 6. Turbine Failure Causing Observable Casing Damage 7. Vessel or Vehicle Collision With Structures or Equipment Required for Safe Shutdown or a Loaded ISFSI Confinement Boundary 8. Flood Level > 19.7 Feet Mean Sea Level 9. Flooding in Areas Containing Safe Shutdown Equipment	GU1 FIRE Mode ALL 1. Fire in Buildings OR Areas Adjacent to Areas Needed for Safe Shutdown NOT Extinguished Within 15 Minutes of Control Room Notification OR Verification of Control Room Alarms 2. Fire affecting a loaded ISFSI confinement boundary NOT extinguished within 15 minutes of notification. GU2 TOXIC/FLAMMABLE GASES Mode ALL 1. Life Threatening Toxic Gases OR Flammable Gas Concentrations as Identified in C-OP 200.5, Oil, Hazardous Material, Hazardous Waste and Mixed Waste Contingency Plan Affecting Normal Operation AREAS OF CONCERN 2. Notification of a Near-Site Release That May Require Evacuation Quadation of a Near-Site Release That May Require Evacuation AREAS OF CONCERN Main Steam Valve Building Demineralized Water Storage Tank ESF Building	JU1 JUDGEMENT Mode ALL Any Condition For Which Judgement Indicates Potential Degradation in the Level of Safety of the Plant Note All Plant N FOR SAFE SHUTDOWN Intake Structure Station Transformers Emergency Generator Enclosure Fuel Building	UNUSUAL EVENT DELTA-TWO OR DELTA-ONE Events are in process or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs. Solution State August 2018
NOTE: When two or more that apply, always choose the EAL of the highest incident class	nearon, also always read norm top to bottom in each category.			I-7 of 8

MILLSTONE 3 EMERGENCY ACTION LEVELS BARRIER FAILURE REFERENCE TABLE

IMMINENT - No Turnaround in Safety System Performance is Expected AND Escalation to General Emergency Conditions Will Occur Within 2 Hours

INDICATORS	FUEL CLAD BARRIER	RCS BARRIER	CTMT BARRIER	
STATUS TREES	FCB1 LOSS L Core Cooling - RED POTENTIAL LOSS P Core Cooling - ORANGE P Heat Sink - RED AND BOTH of the Following: • Required Feedwater Flow Can NOT Be Established	RCB1 LOSS Not Applicable POTENTIAL LOSS P RCS Integrity - RED Host Sink - RED AND Required Everywater Flow Can	CNB1 LOSS Not Applicable POTENTIAL LOSS P Containment - RED	
CORE EXIT TC TEMPERATURES	RCS Bleed and Feed Can NOT Be Established FCB2 LOSS Core Exit TC Temperatures > 1200 °F POTENTIAL LOSS P Core Exit TC Temperatures > 718 °F	P NOT Be Established Within 15 Minutes RCB2 LOSS L RCS Subcooling < 32 °F Due to RCS Leak (115°F Adverse CTMT)	CNB2 LOSS Not Applicable POTENTIAL LOSS P Entry Into FR-C.1, Response to Inadequate Core Cooling, or FR-C.2, Response to Degraded Core Cooling with RVLMS < 19% (Plenum) with OPERABLE 19% sensor (NA if no OPERABLE 19% sensor)AND Core Exit TC Temperatures Do NOT Decrease Within 15 Minutes	
PRESSURE		RCB3 LOSS Not Applicable POTENTIAL LOSS Uncontrolled RCS Pressure Decrease and Increasing Containment Radiation Monitors	$\begin{tabular}{ c c c c c } \hline CNB3 & LOSS \\ \hline L & Rapid Unexplained CTMT Pressure Decrease \\ \hline Following Initial Increase \\ \hline L & No CTMT Pressure Increase When Expectation Exists \\ \hline POTENTIAL LOSS \\ \hline P & CTMT Pressure $\geq 60 PSIA AND Increasing \\ \hline P & CTMT H_2 Concentration $\geq 4\% \\ \hline \end{tabular}$	
COOLANT LEAKAGE		RCB4 LOSS L Entry Into E-3, "Steam Generator Tube Rupture" AND Reactor Coolant Leak > Capacity of One Charging Pump POTENTIAL LOSS P Reactor Coolant Leak > Capacity of One Charging Pump AND ANY of the following: Entry into E-0, "Reactor Trip or Safety Injection" Entry into AOP 3555, "Reactor Coolant Leak" Entry into AOP 3576, "Steam Generator Tube Leak" P Entry into E-3, "Steam Generator Tube Rupture" AND Reactor Coolant Leak Coolant Leak Capacity of One Charging Pump 	CNB4 LOSS L Primary to Secondary > Tech Spec Limits AND EITHER exists: • Nonisolable Steam Release from Affected S/G to environment. • Prolonged Release From Affected S/G to Environment When Used for Cooldown. (see basis for description of prolonged release) L Failure of BOTH Isolation Valves AND a Pathway to the Environment Exists L Entry Into ECA-1.2, LOCA Outside Containment, Is Required AND Reactor Coolant Leakage is Verified P Entry Into ECA-1.2, LOCA Outside Containment	
RADIATION	FCB3 LOSS L Sustained Valid RE-04A/05A Reading > * R/hr. Readings are considered sustained valid when the effects of TIC have dissipated. L Sustained valid RE-04A/05A Reading > 5 R/hr Without RCS Release Inside Containment. Readings are considered sustained valid when the effects of TIC have dissipated. L At Least 5% Fuel Clad Damage As Determined By Core Damage Estimate L Dose Rate at One Foot from Unpressurized RCS Sample ≥ 50 mR/hr/ml RE-41/42 Reading >0.040 R/hr S/D or > 0.060 R/Hr Full Power for > 15 Min. Without RCS Release Inside Containment *See Table 1	RCB5 LOSS L Sustained Valid RE-04/05A Reading > 5 R/hr Without Fuel Clad Barrier Loss. Readings are considered sustained valid when the effects of TIC have dissipated. POTENTIAL LOSS Not Applicable	CNB5 LOSS L Offsite Dose Plume Rate ≥ 5x10 ⁻⁶ Times RE-04A/RE-05A Reading if Coolant Loss is to CTMT POTENTIAL LOSS P Sustained Valid RE-04A/05A Reading > * R/hr. Readings are considered sustained valid when the effects of TIC have dissipated. P At Least 20% Fuel Clad Damage As Determined By Core Damage Estimate *See Table 1	Time
WATER LEVEL	FCB4 LOSS Not Applicable POTENTIAL LOSS P RVLMS ≤ 19% (Plenum) with OPERABLE 19% sensor (NA if no OPERABLE 19% sensor)		CNB6 LOSS L No CTMT Sump Level Increase When Expectation Exists POTENTIAL LOSS Not Applicable	
JUDGEMENT	FCB5 Any Condition For Which Judgement Indicates Loss or Potential Loss of Fuel Clad Barrier Due to: Imminent Barrier Degradation Based On Current Safety System Performance Degraded Fission Barrier Monitoring Capability Making Barrier Status Indeterminate	RCB6 Any Condition For Which Judgement Indicates Loss or Potential Loss of RCS Barrier Due to: Imminent Barrier Degradation Based On Current Safety System Performance Degraded Fission Barrier Monitoring Capability Making Barrier Status Indeterminate	CNB7 Any Condition For Which Judgement Indicates Loss or Potential Loss of CTMT Barrier Due to: Imminent Barrier Degradation Based On Current Safety System Performance Degraded Fission Barrier Monitoring Capability Making Barrier Status Indeterminate	





After Shutdown (hrs)	FCB3 Fuel Clad Loss Threshold (R/hr)	CNB5/RG1 Containment Loss Threshold (R/hr)							
<u><</u> 2	200	800							
> 2 to 4	125	500							
> 4 to 12	50	200							
> 12	25	100							

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Appendix J

APPENDIX J

EVACUATION TIME ESTIMATE PLUME EXPOSURE PATHWAY

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Appendix J

Estimates for Evacuation of the Plume Exposure EPZ

The following tables summarize the results of the Evacuation Time Estimate (ETE) prepared for the Millstone Power station in 2012, to reflect the 2010 U.S. Census and the current EPZ evacuation zones. The population estimates are based on the 2010 U.S. Census block level population and housing data.

The ETE statistics provide the elapsed times for 90 and 100 percent, respectively, of the population within the impacted region, to evacuate from within the impacted region.

The various population components are presented for fourteen basic scenarios. The road network for evacuation planning consists of designated routes plus additional roadways needed to accurately simulate conditions during an evacuation.

An analytical tool DYNEV 11, was used to generate the ETEs. The model accounts for road and intersection capacity, variable vehicle loading rates, and the geographic distribution of vehicles entering the network.

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Table J-1 - Time to Clear the Indicated Area of 90 Percent of the Affected Population

		Sumn	ner	Sumn	ner	Summer		Winter			Winter		Winter Summe		Summer
		Midw	eek	Week	end	Midweek Weekend	ħ	lidweek		Weekend			Midweek Midwe Weekend Weeke	Midweek Weekend	Midweek
Sce	narlo:	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	12) (13)	(14)
	Alfartad	Midd	lay	Midd	lay	Evening	1	Midday		1	Midday		Evening	Evening	Midday
Region	Zones	Good Weather	Rain	Good Weather	Rain	Good Weather	Good Weather	Rain	Snow	Good Weather	Rain	Snow	Good Weather	Special Event	Roadway Impact
						Entire 2-Mi	le Region, 5	-Mile Re	gion, and	EPZ					
R01	A	2:30	2:40	2:30	2:40	2:10	2:35	2:45	3:10	2:25	2:40	3:05	2:10	2:15	2:35
R02	AB	2:45	2:55	2:40	2:50	2:20	2:45	3:00	3:20	2:40	2:50	3:15	2:20	3:00	2:55
R03	ABCDEF	3:40	4:00	3:25	3:40	2:55	3:45	4:05	4:35	3:20	3:40	4:05	2:55	3:55	4:35
						5-Mile Reg	ion and Key	hole to E	PZ Bound	lary					
R04	ABD	2:55	3:10	2:50	3:00	2:25	3:00	3:10	3:40	2:50	3:00	3:25	2:25	3:00	3:10
R05	ABCD	3:15	3:35	3:10	3:25	2:40	3:15	3:35	4:05	3:05	3:15	3:50	2:45	3:20	3:45
R06	ABC	3:10	3:25	3:00	3:20	2:40	3:10	3:25	3:50	3:00	3:15	3:40	2:40	3:25	3:35
R07	ABCE	3:45	4:05	3:25	3:45	3:00	3:45	4:05	4:35	3:20	3:35	4:00	3:00	3:55	4:30
R08	ABE	3:30	3:40	2:55	3:20	2:45	3:35	3:50	4:15	2:55	3:15	3:45	2:45	3:20	4:05
R09	ABEF	3:30	3:40	2:55	3:20	2:45	3:35	3:50	4:15	2:55	3:15	3:45	2:45	3:20	4:05
R10	ABF	2:45	2:55	2:40	2:50	2:20	2:45	3:00	3:20	2:40	2:50	3:15	2:20	3:00	2:55
					Stag	ed Evacuatio	n - 2-Mile Re	egion and	Keyhole	to 5 Miles					
R11	AB	3:25	3:30	3:25	3:30	3:05	3:25	3:30	4:05	3:25	3:25	4:10	3:05	3:25	3:25

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Table J-2 - Time to Clear the Indicated Area of 100 Percent of the Affected Population

		Sumn	Summer		Summer Summer		Winter				Winter		Winter	Summer	Summe
		Midweek Weekend			Midweek Weekend Midweek				, v	Veekend	an b	Midweek I Weekend V	Midweek Weekend	Midwee	
Sce	nario:	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	2) (13)	
	Allented	Midd	lay	Midd	ay	Evening		Midday			Midday		Evening	Evening	Midday
Region	Zones	Good Weather	Rain	Good Weather	Rain	Good Weather	Good Weather	Rain	Snow	Good Weather	Rain	Snow	Good Weather	Special Event	Roadwa
						Entire 2-M	le Region,	5-Mile Re	gion, and	EPZ		1			
R01	A	4:30	4:30	4:30	4:30	4:30	4:30	430	6:05	4:30	4:30	6:05	4:30	4:30	4:30
R02	AB	4:35	4:35	4:35	4:35	4:35	4:35	435	6:05	4:35	4:35	6:05	4:35	4:35	4:35
R03	ABCDEF	4:55	5:30	4:40	4:45	4:40	5:25	550	6:25	4:40	4:45	6:10	4:40	5:00	7:10
						5-Mile Reg	ion and Ke	yhole to E	PZ Bound	ary					
R04	ABD	4:40	4:40	4:40	4:40	4:40	4:40	4:40	6:10	4:40	4:40	6:10	4:40	4:40	4:40
R05	ABCD	4:40	4:40	4:40	4:40	4:40	4:40	4:45	6:10	4:40	4:40	6:10	4:40	4:40	4:50
R06	ABC	4:40	4:40	4:40	4:40	4:40	4:40	4:45	6:10	4:40	4:40	6:10	4:40	4:40	4:40
R07	ABCE	4:55	5:30	4:40	4:45	4:40	5:20	5:50	6:25	4:40	4:45	6:10	4:40	5:00	7:10
R08	ABE	4:55	5:30	4:40	4:45	4:40	5:15	5:30	6:15	4:40	4:40	6:10	4:40	4:45	6:55
R09	ABEF	4:55	5:30	4:40	4:45	4:40	5:15	5:30	6:15	4:40	4:40	6:10	4:40	4:45	6:55
R10	ABF	4:35	4:35	4:35	4.35	4:35	4:35	435	6:05	4:35	4:35	6:05	4:35	4:35	4:35
					Stag	ed Evacuatio	n-2-Mile A	legion and	Keyhole	to 5 Miles					
R11	AB	4:40	4:40	4:40	4:40	4:40	4:40	4:40	6:10	4:40	4:40	6:10	4:40	4:50	4:40

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Zone	Residents	Transit- Dependent	Transients	Employees	Special Facilities	Schools	Shadow Population	External Traffic	Total
A	19,379	781	9,734	1,313	2,119	4,270	0	0	37,596
8	33,573	1,229	1,419	2,804	871	9,770	0	0	49,666
С	14,618	519	426	61	52	3,954	0	0	19,630
D	8,731	311	2,118	38	0	1,669	0	0	12,867
E	45,456	1,617	4,836	6,747	483	8,552	0	0	67,691
F	236	0	3,500	0	0	0	0	0	3,736
Shadow	0	0	0	0	0	0	14,414	0	14,414
Total	121,993	4,457	22,033	10,963	3,525	28,215	14,414	0	205,600

NOTES:

- a. Inmate population at York Correctional has been included within the special facilities population. For this reason, 1,685 people have been
 removed from the residential population in Zone A to avoid double counting.
- b. United States Coast Guard Academy students are included in total school enrollment. For this reason, 1,100 students have been removed from the residential population in Zone 8 to avoid double counting.
- c. Shadow Population has been reduced to 20%. Refer to Figure 2-1 for additional information.

d. Special Facilities include both medical facilities and correctional facilities.

Appendix J

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Appendix K

APPENDIX K

SERO PERSONNEL TRAINING SUMMARY

<u>Appendix K</u>

The following table provides a summary of training, for the qualification of SERO personnel. Detailed lesson plans and administrative controls are maintained in EP Training Program Guide TR-AA-TPG-2400. In addition, EPA-FAP01 defines specific training requirements. See Reference #4 below

Training Summary	Table 5-1 Ref. #
Provide an overview of responsibilities and actions that occur during an	1
emergency. This includes classification system, notifications, communications,	
Station Emergency Response Organization, Emergency Response Facilities and	
equipment. This lesson may be computer based training and is used for initial and	
continuing training.	
Provide hands-on instruction for the operation of the OFIS computer program.	2
Provide instruction on the function and operation of the Emergency Notification	3
and Response System, in addition to providing instruction on the various reports	1
available.	
Provide practical application of specific emergency duties and responsibilities as	4
well as hands-on experience with emergency equipment during the conduct of a	MP-26-
training drill, facility walk-through or on-the-job training.	EPA-FAP01
Provide overview of meteorological conditions and their impact during an	5
emergency, including equipment and resources available to access this data.	
Provide training on the event based EAL tables, including structure and practical	6
applications using scenarios.	
Provide familiarization training on the event based EAL tables.	7
Identify NRC initiatives in the area of accident management and familiarize	8
students with types of severe accident phenomena.	
Provide SERO position specific duties and responsibilities as delineated in the	9
Emergency Plan and procedures.	
Explain basic principles of meteorological analysis and forecasting, including	10
interpretation and communication of data.	
Provide methods for performing containment curie level estimation and for	11
assessing core uncovery projections.	
Provide methods for performing radiological dose calculations.	12
Demonstrate operation of the applicable computer programs for radiological dose	13
assessments.	
Provide training on process for preparing protective action recommendations to	14
the State of Connecticut.	_
Provide training for performance of on-shift radiological dose calculations using	15
computer programs.	