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Vice President

440-280-5382

November 28, 2018
L-18-168

10 CFR 50.90

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001SUBJECT:
Perry Nuclear Power Plant
Docket No. 50-440, License No. NPF-58
Emergency Plan Amendment Request

Pursuant to 10 CFR 50.90, FirstEnergy Nuclear Operating Company (FENOC) hereby requests an amendment to the Perry Nuclear Power Plant (PNPP) Emergency Plan. The amendment would transfer rescue and first aid duties from two on-shift security force members to on-shift fire brigade personnel, reduce the number of radiation monitoring teams by one, and make other related changes.

An evaluation of the proposed amendment is enclosed. FENOC is requesting Nuclear Regulatory Commission (NRC) staff approval of the proposed amendment by November 30, 2019. Once approved, the amendment shall be implemented within 90 days.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Phil H. Lashley, Acting Manager - Nuclear Licensing and Regulatory Affairs, at 330-315-6810.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 28, 2018.

Sincerely,



David B. Hamilton

Enclosure:

FENOC Evaluation of the Proposed Emergency Plan Changes

Perry Nuclear Power Plant
L-18-168
Page 2

cc: NRC Region III Administrator
NRC Resident Inspector
NRC Project Manager
Branch Chief, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
Utility Radiological Safety Board

Subject: Emergency Plan Amendment Request

Table of Contents

- 1.0 SUMMARY DESCRIPTION
 - 2.0 DETAILED DESCRIPTION
 - 2.1 PNPP Emergency Plan Background
 - 2.2 Reason for the Proposed Changes
 - 2.3 Description of the Proposed Changes
 - 3.0 TECHNICAL EVALUATION
 - 3.1 Technical Analysis
 - 3.2 Functional Analysis
 - 3.3 Conclusions
 - 4.0 REGULATORY EVALUATION
 - 4.1 Applicable Regulatory Requirements and Criteria
 - 4.2 Significant Hazards Consideration
 - 4.3 Conclusions
 - 5.0 ENVIRONMENTAL CONSIDERATION
- ATTACHMENTS:
- 1. Emergency Plan Page Mark-ups
 - 2. Letters of Concurrence from State and Local Authorities

1.0 SUMMARY DESCRIPTION

This evaluation supports a request to amend the Perry Nuclear Power Plant (PNPP) Emergency Plan. The proposed amendment would revise the PNPP Emergency Plan by transferring rescue and first aid duties from two on-shift security force members to on-shift fire brigade personnel, reduce the number of offsite radiation monitoring teams (RMTs) by one, and make other related changes.

Based on a Title 10 of the Code of Federal Regulations (10 CFR) Part 50, Section 50.54(q) evaluation of the proposed changes, there will be a reduction in PNPP Emergency Plan effectiveness as defined in 50.54(q)(1)(iv). In accordance with 10 CFR 50.54(q)(4), these changes to the emergency plan that reduce the effectiveness of the plan may not be implemented without prior Nuclear Regulatory Commission (NRC) approval, and are hereby submitted as a license amendment request in accordance with 10 CFR 50.90.

2.0 DETAILED DESCRIPTION

2.1 PNPP Emergency Plan Background

PNPP Emergency Plan, Revision 5, was reviewed and approved by the NRC, as documented in the NRC Safety Evaluation Report, Supplement Number 7, dated November 1985. The NRC staff concluded that the emergency plan provides reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency and meets the requirements of 10 CFR 50 and Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," thereto.

Four emergency response facilities are provided to augment the on-shift staff: The Technical Support Center (TSC), Operations Support Center (OSC), Emergency Operations Facility (EOF), and Joint Information Center (JIC). These emergency response facilities are described in the PNPP Emergency Plan. During an emergency, the shift manager initially assumes the responsibility as emergency coordinator. Emergency response by on-shift staff is directed by the emergency coordinator from the control room until relieved by an augmenting staff with the subsequent activation of emergency response facilities.

The PNPP Emergency Plan uses the four standard levels of emergency classification as described in NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," (Accession No. ML040420012, hereafter referred to as NUREG-0654, Revision 1). The current PNPP Emergency Plan (Revision 52) maintains the practice of activating the TSC and OSC at an Alert or higher classification, and activation of the EOF and JIC at a Site Area or General Emergency classification level.

2.2 Reason for the Proposed Changes

The proposed change to the number of RMTs and transfer of augmentation staff responsibility for onsite (out-of-plant) surveys from RMTs to radiation protection technicians reduces the number of radiation monitoring personnel that must be available 24 hours a day to respond to the site.

Definitions for the terms offsite surveys and onsite (out-of-plant) surveys are added to make clear the areas to be surveyed by the augmentation staff RMTs and radiation protection technicians.

The proposed change to transfer on-shift rescue and first aid duties from security personnel to the fire brigade will reduce the required number of on-shift security personnel. This proposed change eliminates two on-shift minimum staff positions that are performed 24 hours a day.

2.3 Description of the Proposed Changes

Descriptions of the proposed PNPP Emergency Plan changes are provided below. The justification for each change is discussed in Section 3.2 of this evaluation. The changes are shown in Attachment 1 to this evaluation as marked-up PNPP Emergency Plan pages. Added characters are shown underlined and deleted characters are shown with a line through them in Attachment 1. Attachment 2 to this evaluation provides letters of concurrence with the proposed PNPP Emergency Plan changes from the State of Ohio and local authorities.

- a. In Section 1, "Definitions," on page 1-5, definitions for the terms offsite surveys and onsite (out-of-plant) surveys are to be added.
 1. The definition of offsite surveys is to read as follows.

Radiological surveys performed in the area outside the Protected Area fence surrounding the Perry Plant.
 2. The definition of onsite (out-of-plant) surveys is to read as follows.

Radiological surveys performed in the area within the Protected Area fence and outside of plant buildings.
 3. Defined terms starting with the added definition of offsite surveys are to be renumbered.
- b. In Section 4.1.2, "Alert," on page 4-3, the wording of the second purpose of declaring an Alert classification is to be revised from: "Perform confirmatory radiation monitoring if required; . . .;" to read: "Ensure that the Radiation Monitoring Teams (RMTs) are dispatched, and perform confirmatory radiation monitoring if required; . . ."
- c. In Section 4.1.3, "Site Area Emergency," on page 4-3, the purposes for declaring a Site Area Emergency are to be revised to reflect RMT dispatch at the Alert classification.

FENOC Evaluation of the Proposed Emergency Plan Changes

Perry Nuclear Power Plant

Page 4 of 16

1. The second listed purpose that reads as follows is to be deleted, since the purpose of declaring an Alert was changed to ensure RMTs are dispatched:

Ensure that the radiation monitoring teams (RMTs) are dispatched both onsite and offsite.
2. The subsequent stated purposes “3” and “4” are to be renumbered “2” and “3.”
- d. The first sentence of the first paragraph in Section 5.2.1, “Shift Staffing,” on page 5-1, is to be revised from: “The plant is continuously manned with a minimum shift complement of twenty-one (21) personnel,” to read: “The plant is continuously manned with a minimum shift complement of nineteen (19) personnel.” Underline was added in this description for emphasis.
- e. In Section 5.2.2.1, “Control Room (CR),” on page 5-4, one of the listed duties of the Shift Manager in an emergency is to be revised to remove reference to activating the first aid teams, since the fire brigade will provide first aid. The duty “Activating the first aid and fire brigade teams, and directing their response,” was revised to read: “Activating the fire brigade team and directing its response.” Underline was added in this description for emphasis.
- f. In Section 5.2.2.2, “Operations Support Center (OSC),” the RMT description in the fourth paragraph on page 5-5 is to be revised to reflect elimination of the third RMT at Site Area Emergency or higher classification. The current wording: “The number of teams responding is dependent on the emergency classification. For an Alert, two (2) RMTs will respond to perform monitoring; for a Site Area or General Emergency, three (3) teams will respond.” is to be revised to read: “At an Alert, two (2) RMTs will respond to perform monitoring.” Underline was added in this description for emphasis.
- g. Proposed changes to the paragraphs in Section 5.2.3, “Activation and Staffing,” are described below. Underline was added in the following descriptions to emphasize the changes.
 1. The last sentence of the fourth paragraph on page 5-15 of Section 5.2.3 currently states that: “During the final phase, an additional RMT will assemble bringing the total to three (3) RMTs under the direction of the EOF Offsite Radiation Advisor.” This sentence is to be revised to state that: “During the final phase, the RMTs will be under the direction of the EOF Offsite Radiation Advisor.”
 2. The first sentence of the next to last paragraph on page 5-16 of Section 5.2.3 is to be revised to indicate that “Shift personnel” instead of “Security personnel” trained in The American National Red Cross, The American Heart Association or equivalent first aid and cardiopulmonary resuscitation (CPR) are available onsite on a 24-hour basis to provide immediate assistance at the scene of an accident per EPI-B4, “First Aid and Medical Care.”
- h. Table 5-1, “Perry Plant Emergency Response Organization Functions and Shift Staff Augmentation Plan,” includes the two tables 5-1a and 5-1b identified below. Table 5-1a and Table 5-1b (pages 5-22 and 5-24, respectively) are to be revised to

reflect proposed changes to on-shift rescue and first aid responsibility and elimination of the third RMT, respectively.

1. Table 5-1a, "Perry Plant Emergency Response Organization On Shift Functions And Staffing" functional area "1st Aid and Rescue," emergency position "Security Force" is to be changed to "Fire Brigade Member." A reference to footnote a is to be added to the required shift staffing column for the 1st Aid and Rescue functional area and the total required shift staffing shown on the table is to be reduced from 21 to 19, since the first aid and rescue function will be performed by members of the fire brigade as a collateral duty.
 2. Table 5-1b, "Perry Plant Emergency Response Organization Shift Staff Augmentation Functions And Staffing," major functional area "Radiological Accident Assessment and Support of Operational Accident Assessment," 60-minute goal for additional one RMT Leader and one RMT Helper is to be deleted. This is the third RMT. The onsite (out-of-plant) surveys major task performed by RMTs is to be moved with in-plant surveys associated with the same major functional area and be performed by radiation protection technicians.
- i. The third assessment action in Section 6.2.2, "Assessment actions for Alerts," on page 6-5, is to be revised to refer to "dispatch" of RMTs consistent with proposed Section 4.1.2 wording. The current wording: "The mobilization of two RMTs to monitor for possible releases," would be revised to read: "The dispatch of two RMTs to monitor for possible releases." Underline was added in this description for emphasis.
 - j. The second assessment action in Section 6.2.3, "Assessment Actions for Site Area Emergencies," on page 6-6, is to be revised as follows.
 1. The first sentence of the second assessment action is to be deleted since the proposed change would eliminate the requirement for dispatch of a third radiation monitoring team. The current sentence that states: "Radiological monitoring efforts shall be greatly increased."
 2. The second sentence of the second assessment action is to be revised to remove the requirement for dispatch of a third radiation monitoring team. The current wording: "An additional RMT shall be mobilized to obtain air samples and perform beta-gamma field measurements," would be revised to read: "Previously dispatched RMTs shall continue to obtain air samples and perform beta-gamma field measurements." Underline was added in this description for emphasis.

3.0 TECHNICAL EVALUATION

An analysis of changes in radiation protection oversight of personnel and dose assessment implemented since Revision 5 of the PNPP Emergency Plan is provided in Section 3.1. The functional analysis provided in Section 3.2 evaluates the impact of the proposed PNPP Emergency Plan changes on the ability of the on-shift staff to perform the major tasks for the related major functional areas described in NUREG-0654, Revision 1, Table B-1, "Minimum Staffing Requirements for NRC Licensees for Nuclear Power Plant Emergencies."

3.1 Changes in Radiation Protection Oversight and Dose Assessment

3.1.1 Radiation Protection Oversight

The need for radiation protection oversight of personnel has been greatly reduced due to technological advances. Originally, radiological access control was a labor intensive task. Dedicated Radiation Protection Technicians were required to check dose margins, training qualifications, and ensure workers had read and understood the radiation protection work permit. Worker access control is now automated because radiation protection work processes have been computerized. Radiation work permit access control and electronic dosimeter computer systems work together to provide a fully integrated system allowing workers to sign-in on radiation work permits and to self-issue electronic dosimeters. During a declared emergency, radiation work permits and dose set points will change depending on the emergency and plant conditions. Worker dose margins and training qualifications are also automatically verified when the radiation work permit access control system is used. If a worker's dose margin is inadequate or training is expired, the worker's access would be precluded and the access control system would not allow issuance of an electronic dosimeter. In an emergency, approval to exceed dose margins is required. During the log-in process, workers acknowledge their electronic dosimeter alarm set points and that they have read and understand their radiation work permit. The electronic dosimeter provides the worker with a continuous status of dose received and work area dose rates and will alarm at preset dose and dose rates. Worker use of electronic dosimeters facilitates more efficient use of radiation protection technicians to provide radiation protection coverage while preserving the as-low-as-reasonably-achievable concept.

Access control is maintained because the worker must obtain an electronic dosimeter and enter a radiation work permit number into the access control computer system prior to being allowed access into the radiologically controlled area. No setup is required for the radiation work permit access control computers, which allows radiation protection technicians to be used for more critical tasks during emergency response. Personnel are required to self-monitor for radioactive contamination whenever they exit the radiologically controlled area. No radiation protection technician involvement is necessary for this contamination monitoring activity because workers are trained to perform this task without supervision or oversight. However, contaminated personnel exiting the radiologically controlled area will require radiation protection oversight. This oversight can be performed by the augmenting radiation protection technicians.

3.1.2 Previous On-Shift Dose Assessment

In 1985, the Meteorological Information and Dose Assessment System (MIDAS) software was utilized at PNPP. The MIDAS program received data automatically from the meteorological tower and plant radiation monitors, and provided two plume dispersion models; a straight-line Gaussian model and a plume trajectory estimation model.

In 1995, PNPP upgraded the dose assessment software to Computer Aided Dose Assessment Program (CADAP). CADAP used a 'windows' system capable of running

independently. CADAP was menu driven and configured to provide for rapid calculation of offsite doses for a monitored release automatically seeking inputs for the calculation.

3.1.3 Current On-Shift Dose Assessment

Today, an updated version of the MIDAS dose assessment software is used at the PNPP. The MIDAS software package is installed and operated on designated processors located in the Control Room, TSC, and EOF. The MIDAS software interfaces with the Plant Integrated Computer System on a real time basis to obtain meteorological data, plant vent flow and radiation monitor data, and other plant status indicators used in the MIDAS logic. MIDAS is menu driven and provides control room personnel with an option to rapidly develop a dose projection. MIDAS also provides a graphical representation of the projected plume path, which can be used to aid the field monitoring function.

3.1.4 Improvement Summary

Implementation of computerized radiation protection work processes and changes in dose assessment equipment have occurred since initial approval of the PNPP Emergency Plan. The changes have resulted in a reduction in the need for radiation protection oversight of personnel and improved dose assessment capability. These changes support the conclusion that there would be no significant degradation or loss of functional capability because of the proposed change to eliminate the third RMT and transfer responsibility for onsite (out-of-plant) surveys from RMTs to augmenting radiation protection technicians.

3.2 Functional Analysis

3.2.1 Radiological Accident Assessment and Support of Operational Accident Assessment Function

In accordance with NUREG-0654, Revision 1, the Radiological Accident Assessment and Support of Operational Accident Assessment functional area includes three major tasks of concern, offsite surveys, onsite (out-of-plant) surveys, and in-plant surveys.

Offsite Surveys Major Task

- a. In Revision 5 of the PNPP Emergency Plan, offsite and onsite (out-of-plant) surveys were initiated by two RMTs at an Alert or higher classification. Initial RMT members had 30-minute augmentation response requirements. This function was augmented by the dispatch of an additional RMT at the Site Area Emergency or higher classification. The response time for members of the third RMT was 60 minutes. RMTs were normally comprised of one leader and one helper. The first two RMTs were responsible for monitoring for possible releases and the third RMT was responsible for obtaining air samples and performing field measurements.

- b. The current PNPP Emergency Plan maintains the requirement for dispatch of two RMTs at the Alert classification as well as dispatch of a third RMT at a Site Area Emergency or higher classification. The 30 and 60-minute response times are maintained respectively.
- c. In the proposed PNPP Emergency Plan, dispatch of two RMTs would continue to occur at the Alert classification level with a 30-minute response time from the Alert classification and the requirement for dispatch of a third RMT at the Site Area Emergency or higher classification is eliminated. Additionally, the proposed change separates offsite and onsite (out-of-plant) survey activities in Table 5-1b and defines the boundary between the offsite and onsite (out-of-plant) survey areas as the protected area fence rather than the owner-controlled area fence.

RMTs are dispatched from a location just outside the protected area fence and use dose assessment instrumentation to perform environmental radiation assessments and plume tracking. RMTs are trained to conduct radiation surveys for plume tracking, perform air sampling, and to provide radiological input for dose projections. RMT leader actions include reading dose rate instrumentation and obtaining air samples if required. RMT helper actions include driving to and from field positions and communicating results to dose assessment personnel in the TSC and EOF to support event classification and protective action recommendation development. Based on review of RMT performance during drills and exercises involving environmental monitoring, FirstEnergy Nuclear Operating Company (FENOC) has determined that two RMTs can effectively perform these actions to monitor the area beyond the protected area fence.

The response of two RMTs at the Alert classification supports timely performance of the offsite survey function and is aligned with recent NRC guidance. As a result, the proposed change does not adversely impact performance of the offsite survey major task.

Onsite (out-of-plant) Surveys and In-Plant Surveys Major Tasks

- a. Revision 5 of the PNPP Emergency Plan, Table 5-1, "PNPP Emergency Response Organization Functions and Shift Staff Augmentation Plan," identified "Onsite (out-of-plant)" surveys in the same category as performance of "offsite surveys." The surveys were supported by two RMTs dispatched with a 30 minute arrival goal at an Alert or higher classification and one additional RMT dispatched with a 60 minute arrival goal at a Site Area Emergency or higher classification.

Revision 5 of the PNPP Emergency Plan, Table 5-1, also shows the in-plant surveys major task supported by one on-shift health physics technician, one health physics technician dispatched with a 30-minute arrival goal, and one additional health physics technician dispatched with a 60-minute arrival goal.

- b. The current revision of the PNPP Emergency Plan maintains the Revision 5 requirement for coverage of the onsite (out-of-plant) surveys major task, and in-plant surveys major task. The health physics technician is referred to as a radiation protection technician or RP technician in the current revision of the PNPP Emergency Plan.
- c. The proposed PNPP Emergency Plan combines the onsite (out-of-plant) surveys major task with the in-plant surveys major task and adds definitions for onsite (out-of-plant) surveys and offsite surveys to identify the protected area fence rather than the owner-controlled area fence as the boundary between the two areas for purposes of radiological monitoring.

Shift and augmenting radiation protection technicians meet or exceed the qualifications of American National Standards Institute (ANSI) standard N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel."

Review of onsite monitoring functions shows that in-plant and effluent monitor displays are readily available to the radiation protection technician on-shift. Area radiation monitors provide continuous detection, measurement, and indication of radiation levels in selected areas of the plant. The site radiation monitoring system includes effluent monitoring, which determines concentrations of radioactive material in plant fluid systems and discharged to the environment. Additionally, airborne monitors are used to provide information relative to airborne concentrations of radioactive gases and particulate activity at various locations in the plant.

Use of site monitoring capability effectively supports event classification and onsite protective actions in support of this major task. The onsite (out-of-plant) survey area, based on the new definition of onsite (out-of-plant) surveys, is small enough to allow for monitoring by a single individual and does not require the use of a vehicle for performance of this task. This has been demonstrated during previous integrated drills. As a result, the onsite (out-of-plant) surveys may be completed by radiation protection technicians dispatched in the same manner as in-plant surveys.

With the available onsite monitoring functions and the improvements in computerized radiation protection work processes and dose assessment capability, the onsite (out-of-plant) surveys, in-plant surveys, and radiation protection (for access control, personnel monitoring, dosimetry, coverage for repair, corrective actions, search and rescue, and first aid and firefighting) major tasks identified in PNPP Emergency Plan, Table 5-1b, would be adequately addressed by shift staff augmentation including three radiation protection technicians with a 30-minute arrival goal and three additional radiation protection technicians with a 60-minute arrival goal.

Offsite, Onsite (out-of-plant), and In-Plant Surveys Major Task Summary

The proposed change impacts the offsite, onsite (out-of-plant), and in-plant survey functions. Although on-shift staffing for the Radiological Assessment function is maintained, the proposed change eliminates the use of a third RMT and combines the onsite (out-of-plant) surveys major task with the in-plant surveys major task as part of the augmentation process. Definitions of offsite surveys and onsite (out-of-plant) surveys were added to redefine the boundary between offsite and onsite (out-of-plant) survey areas.

Drill experience over the last several years has demonstrated that two RMTs are sufficient for obtaining needed offsite environmental information in support of event classification and dose assessment functions. With the site radiation monitoring capability and improvements related to changes in radiation protection oversight of personnel and dose assessment capability, the onsite (out-of-plant) surveys, in-plant surveys, and radiation protection major tasks can be adequately addressed by the augmenting radiation protection personnel. Redefining the boundary between offsite and onsite (out-of-plant) survey areas better reflects efficient performance of radiological monitoring activities. As a result, the proposed changes to reduce the number of RMTs dispatched, combine the onsite (out-of-plant) and in-plant surveys major tasks, and redefine the boundary between offsite and onsite (out-of-plant) survey areas do not result in a reduction of event response capability.

3.2.2 Firefighting Function

In accordance with NUREG-0654, Revision 1, the Firefighting functional area is addressed by use of a fire brigade and managed in accordance with site technical specifications.

- a. In Revision 5, of the PNPP Emergency Plan, firefighting response was provided by an on-shift fire brigade as described in PNPP technical specifications. The function was augmented by the offsite local fire department. In Revision 39, details regarding on-shift fire brigade membership were added to the PNPP Emergency Plan.
- b. The current PNPP Emergency Plan maintains the Revision 39 on-shift firefighting function commitment. In the current plan the fire brigade is also trained to perform rescue operations.
- c. The proposed PNPP Emergency Plan changes move responsibility for the rescue operations and first aid function from two on-shift security force personnel to on-shift fire brigade personnel. On-shift fire protection staffing was evaluated in accordance with the requirements of 10 CFR 50, Appendix E, Section IV, "Content of Emergency Plans," Part A, "Organization," paragraph 9 (IV.A.9). The evaluation utilized the Nuclear Energy Institute report NEI 10-05, "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities," methodology, and did not reveal conflicting duties for on-shift fire brigade personnel or other on-shift personnel as a result of the proposed PNPP Emergency Plan changes.

3.2.3 Rescue Operations and First Aid Function

NUREG-0654, Revision 1, Table B-1 indicates that the rescue operations and first aid function may be provided by two shift personnel assigned other functions. The proposed transfer of rescue operations and first aid responsibilities to the fire brigade as a collateral duty is acceptable because the fire brigade is already trained under the current PNPP Emergency Plan to perform rescue operations. Current fire brigade training also includes first aid.

- a. PNPP Emergency Plan, Revision 5, addressed the rescue operations and first aid function by providing two shift guards. The two shift guards received first aid training. Inclusion of dedicated resources for the first aid function was based on a site procedure in place at the time and was not related to a site licensing condition, commitment, or initiated in response to a performance deficiency. The shift health physics technician would provide the necessary health physics coverage for rescue and first aid.
- b. The current PNPP Emergency Plan maintains provisions to address rescue operations and first aid through the use of two on-shift security force members who are not included in the PNPP Security Plan response requirements. The two shift guards receive first aid training. On-shift radiation protection personnel provide the necessary health physics coverage for rescue operations and first aid.
- c. The proposed changes to the PNPP Emergency Plan eliminate the commitment for maintaining two dedicated on-shift security force positions for the performance of the rescue operations and first aid function. The rescue operations and first aid function will be performed by on-shift fire brigade personnel as described in Section 3.2.2 above. The Fire Brigade can effectively perform both the Fire Protection Program activities and first aid and rescue duties. On-shift radiation protection personnel would continue to provide the necessary health physics coverage for rescue operations and first aid.

3.3 Conclusions

The proposed changes support the functional areas of the PNPP Emergency Plan, ensure the protection of the health and safety of the public and site personnel, and will not present a significant burden to the on-shift personnel. With the proposed PNPP Emergency Plan changes the emergency response organization will continue to be capable of effectively responding to an emergency. Therefore, the proposed changes continue to ensure the PNPP Emergency Plan will meet 10 CFR 50.54(q)(2), the requirements of 10 CFR 50, Appendix E, and the planning standards of 10 CFR 50.47(b).

4.0 REGULATORY EVALUATION

FirstEnergy Nuclear Operating Company (FENOC) proposes to revise the Perry Nuclear Power Plant (PNPP) Emergency Preparedness Plan to eliminate the requirement for a third offsite radiation monitoring team and transfer on-shift rescue and first aid duties from security personnel to the fire brigade.

4.1 Applicable Regulatory Requirements/Criteria

Title 10 of the Code of Federal Regulations (10 CFR) Part 50, Section 50.47, "Emergency plans," sets forth emergency plan requirements for nuclear power reactors. The planning standards in 10 CFR 50.47(b) establish the requirements that onsite and offsite emergency response plans must meet to provide reasonable assurance that adequate protective measures will be taken in the event of a radiological emergency. On-shift and augmented emergency response staffing is addressed under 10 CFR 50.47(b)(1) and 10 CFR 50.47(b)(2). Emergency medical support is addressed under 10 CFR 50.47(b)(12).

10 CFR 50.47(b)(1), states, in part, that: "... each principal response organization has staff to respond and to augment its initial response on a continuous basis," and

10 CFR 50.47(b)(2), states, in part, that the emergency response plan must ensure: "... adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available ... "

10 CFR 50.47(b)(12), states that the emergency response plan must ensure: "Arrangements are made for medical services for contaminated injured individuals."

10 CFR Part 50, Appendix E establishes minimum requirements for emergency plans for use in attaining an acceptable state of emergency preparedness. 10 CFR Part 50, Appendix E, Section IV, "Content of Emergency Plans," Part A, "Organization," states, in part, that: "The organization for coping with radiological emergencies shall be described, including definition of authorities, responsibilities, and duties of individuals assigned to the licensee's emergency organization ... " Appendix E, Section IV, Part E, "Emergency Facilities and Equipment," states in part that adequate provisions shall be made and described, including: "Arrangements for medical service providers qualified to handle radiological emergencies onsite."

Regulatory Guide 1.101, Revision 2, "Emergency Planning and Preparedness for Nuclear Power Reactors," provides guidance on methods acceptable to the NRC staff for implementing 10 CFR 50.47(b). Regulatory Guide 1.101 endorses Revision 1 to NUREG-0654/FEMA-REP-1 (NUREG-0654, Revision 1), "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," which provides specific acceptance criteria for complying with the standards set forth in 10 CFR 50.47(b). These criteria provide a basis to develop acceptable radiological emergency plans and improve emergency preparedness.

NUREG-0654, Revision 1, Section II, "Planning Standards and Evaluation Criteria," Evaluation Criteria II.B.1 and II.B.5 are relevant criteria that address the 10 CFR 50.47(b)(2) planning standard, and Evaluation Criterion II.L.2 is a relevant criterion that addresses 10 CFR 50.47(b)(12).

Evaluation Criterion II.B.1 states that:

Each licensee shall specify the onsite emergency organization of plant staff personnel for all shifts and its relation to the responsibilities and duties of the normal staff complement.

Evaluation Criterion II.B.5, states, in part, that:

Each licensee shall specify the positions or title and major tasks to be performed by the persons to be assigned to the functional areas of emergency activity. For emergency situations, specific assignments shall be made for all shifts and for plant staff members, both onsite and away from the site. These assignments shall cover the emergency functions in Table B-1 entitled, "Minimum Staffing Requirements for Nuclear Power Plant Emergencies." The minimum on-shift staffing levels shall be as indicated in Table B-1. The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency. This capability shall be as indicated in Table B-1.

Evaluation Criterion II.L.2, states that:

Each licensee shall provide for onsite first aid capability.

This license amendment request proposes to eliminate the requirement for a third offsite radiation monitoring team, transfer augmentation staff responsibility for onsite (out-of-plant) surveys major task from RMTs to in-plant surveys major task radiation protection technicians, add definitions for the terms offsite surveys and onsite (out-of-plant) surveys, and transfer on-shift rescue and first aid duties from security personnel to the fire brigade.

The existing PNPP Emergency Plan includes a description of the organization, including definition of authorities, responsibilities, and duties of individuals. The proposed changes to the PNPP Emergency Plan will continue to describe the authorities, responsibilities and duties of these individuals and ensure adequate staffing to respond in the affected functional areas. Therefore, the proposed PNPP Emergency Plan satisfies 10 CFR 50.47(b)(1), 10 CFR 50.47(b)(2), and NUREG-0654, Revision 1, evaluation criterion II.B.1.

The current PNPP Emergency Plan staffing specified in Table 5-1a and Table 5-1b meets the intent of NUREG-0654, Revision 1, Table B-1. The PNPP Emergency Plan with the proposed changes would continue to meet the intent of NUREG-0654, Revision 1, Table B-1 (that is, would continue to cover the major functional areas in Table B-1 including radiological accident assessment and support of operational accident

assessment, firefighting, and rescue operations and first aid), and satisfy the evaluation criteria of NUREG-0654, Revision 1, Section II.B.5 and Section II.L.2.

To ensure continued compliance with 10 CFR 50, Appendix E, Section IV, Part A, a functional and staffing analysis has been performed. The functional analysis determined that the major tasks of concern (offsite surveys, onsite out-of-plant surveys, and in-plant surveys) with the reduced number of radiation monitoring teams dispatched does not result in a reduction of event response capability. The staffing analysis demonstrates that on-shift personnel assigned emergency plan implementation functions that are affected by the proposed change (that is, fire brigade personnel) are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the emergency plan. With the proposed changes the PNPP Emergency Plan continues to define authorities, responsibilities, and duties of individuals assigned to the PNPP emergency organization in compliance with 10 CFR 50, Appendix E, Section IV, Part A.

The PNPP Emergency Plan with the proposed changes continues to meet the 10 CFR 50, Appendix E, requirements for attaining an acceptable state of emergency preparedness and continues to provide onsite and offsite emergency response plans that meet 10 CFR 50.47(b) by providing reasonable assurance that adequate protective measures will be taken in the event of a radiological emergency.

4.2 Significant Hazards Consideration

FENOC has evaluated whether a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," and has determined that the operation of PNPP in accordance with the proposed amendment presents no significant hazards. The FENOC evaluation of each criteria in 10 CFR 50.92 follows.

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes to reduce the number of radiation monitoring teams, transfer responsibility for radiological surveys in certain areas, redefine the boundary of certain survey areas, and transfer on-shift responsibility for rescue and first aid duties does not affect structures, systems, and components (SSCs) of the plant, normal plant operation, design functions or analyses that verify the capability of an SSC to perform a design function. Therefore, the proposed changes do not increase the likelihood of a malfunction of an SSC.

With the proposed changes the emergency response organization will continue to be capable of performing their intended functions to mitigate the consequences of an accident or event. The ability of the on-shift emergency response organization to respond adequately to radiological emergencies has been demonstrated as acceptable through a staffing analysis as required by 10 CFR 50, Appendix E, paragraph IV.A.9.

Therefore, the proposed PNPP Emergency Plan changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed changes to reduce the number of radiation monitoring teams, transfer responsibility for radiological surveys in certain areas, redefine the boundary of certain survey areas, and transfer on-shift responsibility for rescue and first aid duties does not involve a physical alteration of the plant (that is, no new or different type of equipment will be installed), a change in the method of plant operation, or the ability of SSCs to perform their design function. Since SSCs are not affected, there are no new failure mechanisms, malfunctions, or accident initiators not considered in the design and licensing basis.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed changes to reduce the number of radiation monitoring teams, transfer responsibility for radiological surveys in certain areas, redefine the boundary of certain survey areas, and transfer on-shift responsibility for rescue and first aid duties does not impact operation of the plant or its response to transients or accidents. The proposed changes do not affect the Technical Specifications, accident analyses, safety margins applied to design and licensing basis functions or to controlling parameters to account for uncertainties to avoid exceeding regulatory or licensing limits established in the licensing basis.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, FENOC concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.3 Conclusions

FENOC has evaluated the proposed change against the applicable regulatory requirements and acceptance criteria. The proposed PNPP Emergency Plan changes continue to assure that regulatory requirements and emergency planning standards associated with emergency response are met, and a finding of "no significant hazards consideration" is justified.

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed

manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment changes an administrative procedure. The amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

ATTACHMENT 1

Emergency Plan Page Mark-Ups

(22 Pages follow)

1.23 Gap Release

A fission product release that occurs when fuel cladding experiences initial rupture. This consists mostly of activity that was released to void spaces within the fuel rods during normal reactor operation. Rapid depressurization provides the driving force for fission product escape. (5)

1.24 General Emergency

Events are in progress or have occurred which involve actual or IMMEDIATE substantial core degradation or melting with potential for loss of containment integrity or HOSTILE ACTION that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA PAG exposure levels offsite for more than the immediate site area.

1.25 Implementing Instructions

Those detailed procedures which provide guidance to individuals and groups for implementation of the provisions of this plan.

1.26 Joint Information Center (JIC)

A specifically designated offsite location and point of contact for the dissemination of information to the news media during an emergency by Company, Federal, State and Local officials.

1.27 Loss

Unless defined by specific Emergency Action Level (EAL) indications, loss shall be defined as a state of inoperability in which functional and operable status cannot be maintained. A system, subsystem, train, component or device is not lost if its functionality is assured.

1.28 Meteorological Information and Dose Assessment System (MIDAS))

The software program designed to provide an automated method for determining the present and/or potential offsite consequences of a significant release to the environment from the Perry Plant during an Emergency Plan event.

1.29 Offsite

Any area outside the Owner-Controlled Area fence surrounding the Perry Plant.

1.30 Offsite Assembly

Evacuation of onsite personnel to designated locations offsite for the purpose of performing personnel accountability or further personnel contamination monitoring.

1.31 Onsite

Moved to next page.

1.31 Offsite Surveys

Radiological surveys performed in the area outside the Protected Area fence surrounding the Perry Plant.

1.32~~1~~ Onsite

The area within the Owner-Controlled Area fence surrounding the Perry Plant.

1.33~~2~~ Onsite Assembly

Evacuation of personnel from areas within the plant that would be required for any emergency situation with assembly at designated locations as directed by the Operations Manager.

1.34 Onsite (out-of-plant) Surveys

Radiological surveys performed in the area within the Protected Area fence and outside of plant buildings.

1.35~~3~~ Operable/Operability

A system, subsystem, division, component, or device shall be operable or have operability when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, division, component or device to perform its specified safety function(s) are also capable of performing their related support function(s). (6)

1.36~~4~~ Operations Support Center (OSC)

The onsite location in close proximity to the Control Room and Technical Support Center (TSC) to which plant support personnel and other emergency response team personnel report and await instructions. The Operations Support Center (OSC) is located on the 599' level of the Control Complex.

1.37~~5~~ Owner-Controlled Area

Areas owned by the FirstEnergy Corporation which are located within or adjacent to the Site Boundary security fence.

1.38~~6~~ Personnel Monitoring Equipment

Devices designed to be worn or carried by an individual for the purpose of measuring the radiation dose received (e.g., direct reading dosimeters, thermoluminescent dosimeters etc.).

1.39~~7~~ Plume Exposure Pathway

The means by which a radioactive cloud (plume) can expose the population at risk and/or onsite personnel to radiation. The time of potential exposure could range from hours to days. The principal exposure sources for this pathway are: (1,3)

1. Whole body external exposure to gamma radiation from the radioactive plume and from deposited material; and,
2. Inhalation exposure from the passing radioactive plume.

1.40~~38~~ PNPP

Abbreviation for the Perry Nuclear Power Plant used throughout this document.

1.41~~39~~ Population at Risk

Those persons for whom protective actions are being or would be taken. (1,7)

1.42~~40~~ Projected Exposure Time (PET)

The estimated period of time that the population in the area surrounding the Perry Plant may be exposed to radiation as a result of an accidental airborne radioactive release. Projected exposure time starts when the airborne radioactivity release is estimated to cross the exclusion area, and ends when the radiation levels offsite are expected to return to normal. (4)

1.43~~41~~ Protected Area

The area encompassing the Vital Areas, all areas inside the double perimeter barrier fence and the Primary Access Facility (PAF). (8)

1.44~~42~~ Protective Actions

Those emergency measures taken before or after an uncontrolled release of radioactive material has occurred for the purpose of preventing or minimizing radiological exposure to persons who would likely be exposed if the actions were not taken. (1,7)

1.45~~43~~ Protective Action Guides (PAGs)

Projected radiological dose to individuals in the general population that warrant protective actions following a release of radioactive material. Protective actions would be warranted provided the reduction in individual dose is not offset by excessive risks to individual safety in taking the protective actions. The protective action guides (PAGs) do not include the dose that has unavoidably occurred prior to the assessment. (1,3,8)

1.46~~44~~ Public Information Response Team (PIRT)

Selected staff of the Emergency Public Information Organization who are responsible for dissemination of information during a Perry Plant emergency. They are assigned emergency response duties during an emergency situation that does not require activation of the Joint Information Center (JIC), during the initial stages of an emergency prior to operation of the JIC, or during the recovery of an emergency after deactivation of JIC.

1.47~~5~~ Radiologically Controlled Area (RCA)

An area within a Restricted Area that is posted and controlled due to the presence of radiation, contamination, or airborne radioactivity or the presence of radioactive material. Radiologically Controlled Area and Radiological Restricted Area (RRA) are synonymous. Radiologically Controlled Area is the preferred term.

1.48~~6~~ Recovery Actions

Those actions taken after an emergency to restore the plant as nearly as possible to pre-emergency conditions. (1)

1.49~~7~~ Reentry Actions

The return to an evacuated area, in either the plant or site, for such actions as search and rescue, first aid, firefighting, manipulation or repair of critical equipment or systems, and to assess conditions in preparation for recovery operations.

1.50~~48~~ Secondary Alarm Station (SAS)

The continuously manned security station where offsite law enforcement agency response requests are made. The Secondary Alarm Station (SAS) is located in the Unit 2 Control Room.

1.51~~49~~ Site Boundary

The area within the Owner-Controlled Area which is encompassed by a security fence surrounding the Perry Plant. (8)

1.52~~0~~ Site Area Emergency

Events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or HOSTILE ACTION that results in intentional damage or malicious acts; 1) toward site personnel or equipment that could lead to the likely failure of or; 2) that prevent effective access to, equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA PAG exposure levels beyond the SITE BOUNDARY.

1.53~~1~~ System Control Center (SCC)

The Off-site facility located in Akron, Ohio, which controls and coordinates the generation and transmission within the FirstEnergy Corporation

1.54~~2~~ State

The State of Ohio.

1.55~~3~~ Technical Support Center (TSC)

The onsite location which will serve as the focal point for gathering information on current and projected plant status and for the orderly implementation of emergency procedures in support of reactor command and control functions. The TSC is located on the 603'6" level of the Service Building.

1.56~~4~~ Technical Support Guidelines (TSGs)

Provide a method for supporting and optimizing the accident management strategies contained in the generic Emergency Procedure Guidelines/Severe accident management Guidelines (EPGs/SAMGs). The TSGs describe enhancements to technical activities performed by the ERO, and consist of the following four inter-related assessments: control parameter, plant status, system status, and EPG/SAMG action.

1.57~~5~~ Total Effective Dose Equivalent (TEDE)

The sum of DDE (external dose) and CEDE (internal dose). For dose assessment purposes, DDE is considered the whole body dose in accordance with NUMARC "White Paper: Implementation of the New EPA Protective Action Guides in Existing Emergency Programs, April 1993."

1.58~~6~~ Unrestricted Area

Any area, to which access is not controlled by FirstEnergy Corporation, for purposes of protection of individuals from exposure to radiation and radioactive materials.

1.59~~7~~ Unusual Event

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.

FOOTNOTE REFERENCES FOR DEFINITIONS:

- 1 NUREG-0654/FEMA-REP-1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, November 1980.
- 2 Plant Administrative Procedure, PAP-0114, Radiation Protection Program.
- 3 NUREG-0396 (EPA 520/1-78-016), Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants, NRC/EPA, December 1979.
- 4 The Ohio Plan for Response to Radiation Emergencies at Commercial Nuclear Plants, State of Ohio.
- 5 NUREG/CR-2925; SAND 82-2004, In-Plant Considerations for Optional Offsite Response to Reactor Accidents, November 1982.

- 6 Technical Specifications, Perry Nuclear Power Plant, Unit No. 1
(Docket No. 50-440). Appendix "A" to License No. NPF-58.
- 7 BWR Owners' Group Accident Management Guidelines (AMG) Overview
Document.
- 8 EPA-400-R-92-001, Manual of Protective Action Guides and Protective
Actions for Nuclear Incidents.
- 9 Perry Plant Security Plan.

No change to this page is proposed . This page is included for context.

A conservative philosophy for classification is used. For example, a Site Area Emergency is declared directly if a Site Area EAL is exceeded, without other related events being previously identified and declared as an Unusual Event or an Alert.

EALs are used specifically to provide an early readiness status of emergency response personnel and organizations. The EALs have not been selected to infer any immediate need for protective actions, but rather to provide adequate time for assessment measures. Offsite dose projections, plant status assessments, and protective action recommendations are reported to the local County officials as inputs to their decision on whether or not protective actions for the public are to be implemented.

4.1.1 Unusual Event

An Unusual Event is the least severe of the four (4) emergency classifications defined in this plan. An Unusual Event is defined as follows: Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of SAFETY SYSTEMS occurs.

The purposes for declaring an Unusual Event classification are to:

1. Ensure that the first step in any response is carried out.
2. Provide current information on Unusual Events to offsite authorities.
3. Bring the operating staff to a state of readiness.
4. Provide for the systematic handling of information and decision making.

An incident is classified as an Unusual Event if it is minor and no release of radioactive material requiring offsite response or monitoring is expected with no further degradation of safety systems. Events in this classification are selected based upon a potential to degenerate to a more severe situation rather than on the likelihood that an actual public hazard exists. Local county and State of Ohio authorities are promptly notified of any Unusual Event.

4.1.2 Alert

An Alert is defined as follows: Events are in progress 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 HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA PAG exposure levels.

As in the case of the Unusual Event, the Alert classification includes emergency situations that are expected to be minor but where it has been deemed prudent to alert the offsite emergency participants and mobilize portions of the emergency organization. Any radioactive releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.

The purposes of declaring an Alert classification are to:

1. Ensure that emergency personnel are readily available to respond if the situation becomes more serious;
2. Ensure that Radiation Monitoring Team (RMTs) are dispatched, and
~~perform~~ confirmatory radiation monitoring if required; and
3. Provide offsite authorities with current information.

In addition, because of the nature of the Alert classification, i.e., possible releases of radioactive material, broader assessment actions shall be initiated as described in Section 6.2.2.

4.1.3 Site Area Emergency

The Site Area Emergency classification is defined as follows: Events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or HOSTILE ACTION that results in intentional damage or malicious acts; 1) toward site personnel or equipment that could lead to the likely failure of or; 2) that prevent effective access to, equipment needed for the protection of the public. Any releases are not expected to result in exposure levels which exceed EPA PAG exposure levels beyond the SITE BOUNDARY.

The purposes for declaring a Site Area Emergency are to:

1. Ensure that response centers are manned;
- ~~2. Ensure that the radiation monitoring teams (RMTs) are dispatched both onsite and offsite;~~
23. Ensure that personnel required for evacuation of offsite areas are available should the situation become more serious; and
34. Provide current information for, and consultation with, offsite authorities.

Although immediate protective actions are not automatically required, declaration of a Site Area Emergency sets into motion all personnel onsite and offsite that would be required to perform actions up to and including the evacuation of offsite areas. RMTs are required to make continuing assessments to provide officials with information to decide on protective actions. The Site Area Emergency classification includes accidents which have significant radioactive material release potential. Details of the emergency measures that will be implemented upon declaration of a Site Area Emergency are described in Section 6.0.

5.0 ORGANIZATIONAL CONTROL OF EMERGENCIES

Emergency planning includes recognition of the capabilities of the shift staff, prompt augmentation by off-duty Perry Plant emergency response personnel, the support available from other Company personnel, and support available from local, State and Federal agencies to comprise an effective Emergency Response Organization (ERO). The initial response to an emergency will be handled by the normal shift staff which is capable of:

1. Determining that an emergency exists;
2. Performing initial classification and assessment;
3. Promptly notifying other agencies and individuals;
4. Initiating actions to protect the general public.

Augmentation of the shift staff will be provided by the ERO. The response organization provides additional personnel to mitigate the consequences of an emergency. Beyond this, additional personnel may be called upon to provide specific assistance for specialized tasks. These needs will be determined by the ERO on a case by case basis.

This section of the Emergency Plan addresses the emergency response assignments, authorities, and responsibilities of the normal plant organization and the emergency organization.

5.1 FirstEnergy Organization

Site Operations Department (SOD), Performance Improvement Department (PID), Site Engineering Department (SED), and Maintenance Department activities at the Perry Plant are under the control of the Vice President, Nuclear - Perry. Emergency Response Section (ERS, is under the control of the Director, PID.

The Perry Plant Organization as well as the FirstEnergy Corporate Organization are discussed in Chapter 13.1 of the Perry Plant Updated Safety Analysis Report (USAR).

5.2 Emergency Organization

5.2.1 Shift Staffing

The plant is continuously manned with a minimum shift complement of ~~nineteentwenty-one~~ (1921) personnel. This implements the criteria of NUREG 0654, Table B-1 and NUREG 0737 Supplement 1, Table 2. The normal shift complement provides staffing for the on-shift emergency response organization. Shift emergency response positions for the functional assignments are shown in Table 5-1a.

This minimum shift crew composition for single unit operation is also outlined in NOP-OP-1002, Conduct of Operations.

A detailed analysis that forms the technical basis of the on-shift emergency response staffing is contained in PSI-0026, Control and Revision of the PNPP ERO On-Shift Staffing Analysis Report. This analysis documents the demonstration that on-shift personnel

assigned emergency plan implementation functions are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in Table 5-1a.

The Shift Manager is responsible for operating the plant in compliance with licensing requirements, administrative controls and operating instructions. This includes, when warranted, approving on-shift operations that deviate from established procedures and instructions, evaluating operating experiences, and providing on-shift technical advice to the Unit Supervisors.

During the initial response to an emergency, the Shift Manager assumes the position of Emergency Coordinator until properly relieved of emergency response functions by the designated Emergency Coordinator in the EOF or the TSC Operations Manager. Any individual fulfilling the position of Emergency Coordinator has the responsibility and the authority to direct any and all phases of emergency response. The Emergency Coordinator shall not delegate the following responsibilities:

1. The decision to notify offsite authorities.
2. The decision to make protective action recommendations to offsite authorities.
3. The decision on determination of emergency classification including reclassification or termination.

The Unit Supervisor is responsible for assisting the Shift Manager on duty in operating the plant in a safe and dependable manner. This includes supervising the Reactor Operators, plant operators and attendants required to operate the unit, instructing the shift operating crew concerning temporary and permanent changes to the Perry Plant Operations Manual and assisting the Shift Manager in his administrative duties. The Unit Supervisor reports to the Shift Manager.

The Shift Engineer (SE) will be on-shift reporting to the Shift Manager and available to provide technical support to the Shift Manager, including advising him on the safety status of the plant, diagnosing plant accidents and recommending actions to mitigate the consequences of accidents. The SE will provide on shift reactor and system engineering support, if qualified.

The Reactor Operators are responsible for directing the activities of the non-licensed shift employees including plant operators, attendants, assistants, and others as may be assigned for special tasks to insure proper operation and monitoring of plant systems and equipment. The Reactor Operators report to the Unit Supervisor.

The on-shift Security Shift Supervisor is directly responsible for the coordination of the specific functions of the plant security force as outlined in the Security Plan and EPI.

5.2.2 Emergency Response Organization (ERO)

In the event of an emergency, the ERO will be notified. The assignment of responsibility in the ERO is ultimately the

No change to this page is proposed . This page is included for context.

responsibility of the Vice President, Nuclear - Perry. However, to provide automatic, clearly defined manning of the Perry Plant Emergency Response Facilities, an ERO is pre-defined. This includes the assignment of alternates for the major positions.

The majority of the ERO will be housed in five locations: Control Room (CR), Technical Support Center (TSC), Operations Support Center (OSC), Emergency Operations Facility (EOF), and Joint Information Center (JIC).

The Control Room will continue to control the operation of the plant. During an emergency additional staff will be assigned to the Control Room to aid in mitigation of the effects of the emergency.

The TSC will provide management of onsite emergency activities. The TSC will also be the primary communications link between the Control Room and the balance of the ERO. During emergencies when the EOF is not operational, the TSC will perform the functions of the EOF.

The OSC will serve as the assembly point for Radiation Protection, Maintenance, I&C, and Operations personnel during an emergency. The OSC will utilize the available personnel present or will call in the personnel necessary to support first aid, firefighting, radiation monitoring, and emergency assessment and repair activities.

The EOF will provide overall management of all Company emergency activities. The EOF will be the central point for receipt and analysis of field monitoring data and will be the primary communications contact for all offsite organizations such as the State and the local Counties. The EOF will also provide information to the Public Information Response Team (PIRT) and the JIC for dissemination to the news media.

The JIC will be the central location for dissemination of information to the general public regarding an emergency at the Perry Plant during Site Area or General Emergencies. The JIC will provide a focal point for federal, state, local and FirstEnergy officials to coordinate emergency information received from the EOF and promptly inform the public utilizing local and national media outlets located at the JIC. Prior to the activation of the JIC, the PIRT, functioning from the EOF, will provide an interim location for the dissemination of information to the media.

The functional interfaces between and among the ERO, local services support, and State and local governments are specified in the following sections.

Table 5-1 depicts the functional areas of emergency response activities, the normal position title (or expertise), and the major emergency tasks to be performed including the goals for augmentation of the shift staff by the response organization as outlined by Table B-1 from NUREG-0654.

Each ERO staff position described in Sections 5.2.2.2 through 5.2.2.4 will have at least three (3) individuals qualified at any one time to fill the position.

1. Control Room (CR)

The Shift Manager on duty assumes the position of Emergency Coordinator when an emergency occurs and is in command of the ERO until relieved by the TSC Operations Manager. While acting as Emergency Coordinator, the Shift Manager has the responsibility and authority to direct any and all phases of the emergency response and shall not delegate the following responsibilities:

- a. The decision to notify offsite authorities.
- b. The decision to make protective action recommendations to offsite authorities.
- c. The decision on determination of emergency classification including reclassification or termination.

In the event the Shift Manager is incapacitated, his duties and responsibilities will be assumed by the Unit Supervisor until such time as a relief Shift Manager is available.

The duties of the Shift Manager in an emergency include the following:

- a. Maintaining the plant in a condition that minimizes the danger to the general public.
- b. Verifying the existence and initial classification of an emergency condition.
- c. Notifying plant personnel and offsite support groups, as required.
- d. Activating the ~~first aid and~~ fire brigade teams, and directing its~~their~~ response.
- e. Controlling access of personnel to the Control Room.
- f. Initiating protective measures, as required.

The Shift Engineer (SE) provides an independent assessment of plant conditions and technical advice to the Shift Manager. The SE will also review initial offsite dose assessment activities and protective action recommendations generated by an on-shift Chemistry Technician. Prior to the TSC becoming operational, the SE will provide technical information to the on-call Media Relations Representative or Information Liaison as time and plant conditions allow.

The on-shift Chemistry Technician will perform initial offsite dose assessment activities and development of protective action recommendations, until such time as the Radiation Protection Coordinator at the TSC assumes this responsibility.

The on-shift Instrument and Control (I&C) Technician will report to the Control Room, when requested, to act as communicator for the Shift Manager. A second communicator-qualified I&C Technician may be used; or another communicator trained individual designated by the Shift Manager.

2. Operations Support Center (OSC)

During an emergency, the OSC serves as an assembly area for Radiation Protection Section, Radwaste, Chemistry and Environmental Section, Perry Maintenance Department, and Perry Operations Section personnel.

The OSC Coordinator directs the assembly and dispatching of repair and assessment teams, as well as Radiation Protection and Chemistry personnel from the OSC to support emergency operations. If required, the Shift Manager can assign an interim OSC Coordinator from the personnel present in the facility until the designated OSC Coordinator arrives to aid in the timely activation of this facility.

The following plant supervisory positions have also been identified as part of OSC staffing to assist the OSC Coordinator in directing facility operations:

- Mechanical Supervisor,
- Electrical Supervisor,
- Instrument and Control Supervisor,
- Radiation Protection Supervisor,
- Chemistry Supervisor.

Radiation Monitoring Teams (RMTs) are composed of two members each - an RMT Leader and Helper. The RMT Leader will be trained to perform plume monitoring and sample collection, and to oversee contamination control measures. The RMT Helper will be primarily responsible for driving the RMT vehicle, team communications, and to assist in sample collection and recordkeeping. ~~The number of teams responding is dependent on the emergency classification. For~~At an Alert, two (2) RMTs will respond to perform monitoring, ~~for a Site Area or General Emergency, three (3) teams will respond.~~ Additional teams may be organized as the situation warrants. Radio-equipped, four-wheel drive vehicles will be obtained from ERS for RMT use. RMTs are equipped to perform direct radiation measurements, airborne radioactivity sampling (capable of measuring radioiodine concentrations in air as low as 1.0E-7 uCi/cc), and environmental sample collection.

No change to this page is proposed . This page is included for context.

The Media Relations Supervisor is responsible for supervising all activities in the media work areas; ensuring that all reporters are cognizant of scheduled and unscheduled briefing; acting as a resource for general information; scheduling interviews; assisting the media as required; and reporting to the JIC Manager any media inquiries, problems, trends, etc., for discussion/action.

The Support Services Supervisor is responsible for setting up the JIC at the direction of the JIC Manager; obtaining support services for the JIC staff; providing and supervising the administrative and clerical personnel and equipment operators; arranging delivery of necessary equipment and supplies and repair services to support JIC operation, and arranging for transportation, food, lodging, etc., for an extended period of time.

6. Public Information Response Team (PIRT)

Regardless of whether the Perry Plant Emergency Plan has been entered, the PIRT may be activated to handle increased media interest which may not warrant JIC activation. The decision to activate the PIRT is based on the discretion of the Control Room Shift Manager and the on-call Media Relations Representative. A detailed discussion of PIRT staffing and duties is contained in the EPIOIM.

The PIRT will be activated for an Alert or for events with higher emergency classifications.

The PIRT will operate independently and will be de-activated once the JIC is operational.

For a security or other event where the site is inaccessible, the JIC will activate instead of the PIRT.

5.2.3 Activation and Staffing

The activation and staffing of the Perry Plant Emergency Response Facilities consists of three phases: initial, interim and final. The initial phase consists of shift staff personnel and is the lowest stage of activation, whereas the final phase consists of the full activation and manning of the CR, TSC, OSC, EOF, and the JIC. The interim phase is applicable only when the TSC is fully activated before the EOF is activated, or if activation of the EOF is not deemed necessary.

The initial phase will be implemented upon the declaration of an Unusual Event or higher level emergency. During this phase, various shift personnel support the emergency condition, with the Control Room as the command center and the Shift Manager as the acting Emergency Coordinator.

The interim phase will be implemented upon the declaration of an Alert or higher level emergency. During this phase, shift and various designated personnel support the emergency condition with the TSC as the command center and the Operations Manager as the acting Emergency Coordinator. Figure 5-1 illustrates the Perry Plant ERO during the interim phase.

The final phase, illustrated in Figure 5-1, will be implemented upon the declaration of a Site Area Emergency or a General Emergency. During this phase, the emergency condition will be supported by full activation of all the emergency response facilities, with the EOF as the command center under the direction of the Emergency Coordinator.

The TSC, OSC, and EOF are then expected to be fully functional within 15 minutes of the arrival of their respective staffs. The Staff arrival goals (as shown in Table 5-1a) are 30 minutes for the TSC and OSC, and 60 minutes for the EOF.

Notification of the Perry Plant ERO is performed by the Fire Control Monitoring Station (FCMS) operator continuously manning the FCMS in the Control Room.

Direction and control of the ERO will vary depending on the emergency classification and the degree of activation. During an Unusual Event or initial phase, the Shift Manager will assume the position of Emergency Coordinator and will continue in that position until properly relieved by the Operations Manager or his designated alternate. The Emergency Coordinator has the authority and the responsibility to direct any and all emergency response activities as necessary for any emergency condition.

The following specific responsibilities shall not be delegated by the Emergency Coordinator:

1. The decision to notify offsite authorities.
2. The decision to make protective action recommendations to offsite authorities.
3. The decision on determination of emergency classification including reclassification or termination.

During an Alert or the interim phase, the TSC Operations Manager upon arrival, will be briefed by the Shift Manager and will relieve the Shift Manager as the acting Emergency Coordinator once the TSC is operational. When a Site Area or General Emergency has been declared, EOF Emergency Coordinator upon arrival will be briefed by the TSC Operations Manager and assume the position of Emergency Coordinator once the EOF is operational. In the final phase or full activation, the TSC Operations Manager will maintain control of onsite activities under the direction of the EOF Emergency Coordinator.

Plant operations under all phases are conducted by the normal shift staff. Once the TSC is operational during the interim or final phases, the TSC Operations Advisor will provide interface between the Control Room and the TSC under the direction of the TSC Operations Manager.

An Accident Management Team (AMT) will be mobilized in the TSC under the TSC Operations Advisor to assist in evaluating severe accident mitigation strategies per the TSG. The ERO will provide the organizational structure and logistical support for the implementation of SAMGs. Designated AMT personnel, who are not assigned specific ERO duties per Section 5.2.2, will be contacted as part of the TSC activation process. AMT personnel may be used prior to the implementation of SAMGs to support designated TSC staff in the operational and technical assessment of an event classified in accordance with Section 4.0.

A communicator in the Control Room provides continuing communications with offsite agencies. When the TSC becomes operational or during the interim phase, at least one communicator in the TSC will relieve the Control Room Communicator of the responsibility for maintaining communications with offsite agencies. During the final phase or full activation, at least two communicators stationed at the EOF will relieve the TSC communicators of the responsibility for maintaining communications with offsite agencies.

Offsite dose assessment during the initial phase is the responsibility of an on-shift Chemistry Technician with the Unit Supervisor directing operational radiological activities. Protective action recommendations and their basis will be reviewed by the Shift Engineer (SE) and then referred to the Shift Manager for approval. During the interim phase, the TSC Radiation Protection Coordinator will relieve the on-shift Chemistry Technician of offsite dose assessment responsibilities and the Unit Supervisor of radiological support responsibilities. Upon activation of the EOF during the final phase, the EOF Offsite Radiation Advisor will control offsite dose assessment with the EOF Operations Advisor assisting.

Radiological assessment, if required during the initial phase, will consist of Radiation Protection (RP) personnel either on-shift or called in support of the Control Room, under the direction of the Unit Supervisor. During the interim phase, two (2) RMTs will assemble and will be under the direction of the TSC Radiation Protection Coordinator. During the final phase, ~~an additional RMT will assemble bringing the total to three (3) the RMTs will be under~~ the direction of the EOF Offsite Radiation Advisor.

All in-plant radiological surveys and chemistry/radio-chemistry activities during all phases of an emergency will be conducted by shift Radiation Protection Technician and Chemistry Technician(s), augmented as necessary by additional personnel, under the direction of the TSC Radiation Protection Coordinator.

Technical support during the initial phase will be provided by the SE in the Control Room. During the interim or final phases, the SE will be relieved by the TSC Plant Technical Engineer.

Engineering support is not specifically assigned during the initial phase, but will be designated for the following specialty areas during the interim and final phases, under the direction of the TSC Plant Technical Engineer.

Core/Thermal Hydraulics - Reactor Engineer
Electrical - Electrical Engineer
Mechanical - Mechanical Engineer

Repair and corrective actions during the initial phase of an emergency will be assigned to designated shift personnel as follows:

Mechanical/Electrical Maintenance - Plant Operator
(collateral duty),
Instrumentation and Controls - I&C Technician

During interim and final phases, repair and corrective actions will be managed by the OSC Coordinator, under the direction of the Shift Manager or TSC Maintenance Coordinator (once the TSC is operational), with the following designated personnel in specialty areas utilized at the OSC Coordinator's discretion:

Mechanical Maintenance - Maintenance Supervisor
(Mechanical)
Electrical Maintenance - Maintenance Supervisor
(Electrical)
Instrument and Controls - I&C Supervisor
Radiation Protection Control - Radiation Protection (RP)
Supervisor
Chemistry Analysis - Chemistry Supervisor/Specialist

Radwaste Operations during all emergency phases will be controlled by the shift Radwaste Supervising Operator stationed in the Radwaste Control Room, under the direction of the Shift Manager. During the interim and final phases, the TSC Operations Advisor will assist the Shift Manager in coordinating radwaste activities.

Radiation Protection activities during the initial phase is the responsibility of the shift RP Supervisor or On-Shift Radiation Protection Technician. Radiation Protection staffing will be augmented per Table 5-1 to support interim and final phase emergency response activities.

Fire-fighting response will be provided by shift personnel in accordance with PAP-1910 and the Pre-Fire Plan Instruction (FPIs).

Shiftecurity personnel, trained in The American National Red Cross, The American Heart Association or equivalent first aid and cardiopulmonary resuscitation (CPR) are available onsite on a 24-hour basis to provide immediate assistance at the scene of an accident per EPI-B4. In addition, a dispensary is located onsite for treatment of routine medical emergencies. For injuries inside the RRA, an on-shift RP technician will respond to the accident scene to assist.

Agreements have been entered with Perry Township Joint Fire District and Lake Hospital System for the support of onsite fire-fighting, and the transportation and treatment of injuries per Section 5.3. The Emergency Response Section (ERS) maintains current copies of the letters of agreement. A complete list of the letters of agreement is contained in Appendix B.

TABLE 5-1

PERRY PLANT EMERGENCY RESPONSE ORGANIZATION FUNCTIONS AND
SHIFT STAFF AUGMENTATION PLAN

Table 5-1a
PERRY PLANT EMERGENCY RESPONSE ORGANIZATION ON SHIFT FUNCTIONS AND STAFFING

Functional Area	Major Tasks	Emergency Positions	Required Shift Staffing
1. Plant Operations and Assessment of Operational Aspects	Control Room Staff	Shift Manager (SRO)	1
		Unit Supervisor (SRO)	1
		Reactor Operator	2
		Plant Operator	2
2. Emergency Direction and Control	Command and Control	Shift Manager	1 ^(a)
3. Notification & Communication	Licensee	FCMS Operator	1 ^(a)
	Local/ State	I&C Technician	1 ^(a)
	Federal	I&C Technician	1 ^(a)
	Federal	NRC Phone Talker (SRO/RO/PO)	1
4. Radiological Assessment	Dose Assessment	Chemistry Technician	1 ^(a)
	In-plant Surveys	RP Technician	1
	Intentionally Blank	Intentionally Blank	
	Chemistry	Chemistry Technician	1
5. Plant System Engineering, Repair, and Corrective Actions	Technician Support - OPs - Core Damage	Shift Engineer (STA)	1
		Shift Engineer (STA)	1 ^(a)
	Repair and Corrective Actions	Mechanical Maintenance (PO)	1 ^(a)
		Radwaste Technician	1
		Electrical Maintenance (PO)	1 ^(a)
		I&C Technician	1
6. In-Plant Protective Actions	Radiation Protection	RP Technician	1
		RP Technician	1 ^(a)
7. Fire Fighting	--	FB Leader (RO/SRO)	1
		FB Member (PO/POA)	2
		Fire Brigade Member	2
8. 1 st Aid and Rescue	--	Security Force	2
9. Site Access Control and Accountability	Security & Accountability	SAS Operator	1
		Security Personnel	(b)
TOTAL:			21

19

(a) May be filled by someone filling another position having functional qualifications.

(b) Per PNPP Physical Security Plan.

Fire Brigade Member	2 ^(a)
---------------------	------------------

Table 5-1b (cont.)

PERRY PLANT EMERGENCY RESPONSE ORGANIZATION SHIFT STAFF AUGMENTATION FUNCTIONS AND STAFFING

MAJOR FUNCTIONAL AREA	MAJOR TASKS	POSITION TITLE OR EXPERTISE (FROM NUREG 0654 TABLE B-1)	GOALS FOR ADDITION (5)	
			30 MIN TITLE (LOCATION)	60 MIN TITLE (LOCATION)
Radiological Accident Assessment and Support of Operational Accident Assessment (Cont'd)	Onsite (out of plant) and Offsite surveys		2 RMT Leaders 2 RMT Helpers	1 RMT Leader 1 RMT Helper
	In-Plant and Onsite (out of plant) Surveys Chemistry/Radio-chemistry	RP Technicians Rad/Chem Tech.	1 RP Tech.	1 RP Tech. 1 Chem. Tech.
Plant System. Engineering, Repair & Corrective Actions	Technical Support	Shift Tech. Advisor Core/Thermal Hydraulics Electrical Mechanical	1 Plant Technical Engr. (TSC) 1 Core/Hydraulic Engr. (TSC)	1 Electrical Engr. (TSC) 1 Mechanical Engr. (TSC)
	Repair and Corrective Actions	Mech. Maint. RW Operator Elec. Maint. Instrument & Control (I&C) Tech.	Maintenance Coord. (TSC) OSC Coordinator (OSC)	1 Maint. Supv. Mechanical (OSC) 1 Maint. Supv. Electrical (OSC) 1 I&C Supv. (OSC)

No change to this page is proposed . This page is included for context.

Table 5-1b (cont.)

PERRY PLANT EMERGENCY RESPONSE ORGANIZATION SHIFT STAFF AUGMENTATION FUNCTIONS AND STAFFING

GOALS FOR ADDITION⁽⁵⁾

MAJOR FUNCTIONAL AREA	MAJOR TASKS	POSITION TITLE OR EXPERTISE (FROM NUREG 0654 TABLE B-1)		30 MIN TITLE (LOCATION)	60 MIN TITLE (LOCATION)
Protective Actions (In Plant)	Radiation Prot. a. Access Control b. HP Coverage for Repair, Corrective Actions, Search & Rescue, First-Aid and Fire Fighting c. Pers. Monitoring d. Dosimetry	RP Technicians		2 RP Techs.	2 RP Techs.
Fire Fighting Rescue Operations and First-Aid Site Access Control and Personnel Accountability	Fight Fires Security, Fire Fighting, Communications, Personnel Accountability	Security Personnel		Local Support Local Support	

If it becomes necessary for the Perry Plant to request federal assistance, the Emergency Coordinator will make this request.

6.2 Assessment Actions

Effective coordination and direction of all elements of the emergency organization requires continuing accident assessment throughout an emergency situation. Each emergency class shall invoke similar assessment methods; however, each classification imposes a different magnitude of assessment effort. In the following sections, assessment actions to be taken for each emergency classification are outlined. During an emergency, conditions will be periodically evaluated to determine if the emergency should be reclassified.

6.2.1 Assessment Actions for Unusual Events

The detection of an Unusual Event arises from either exceeding a specific emergency action level for this case, or as a result of alarms, instrument readings, recognition through experience, or any combination thereof. The continuing assessment action to be performed for this classification of emergency shall be in accordance with the EPIs. This consists of monitoring Control Room and other plant instrumentation and status indication until the situation is resolved. The Shift Engineer assists the Shift Manager by providing independent assessments and technical advice. If a fire is the reason for the declaration of an Unusual Event, the Shift Manager will direct the FCMS to request offsite firefighting support.

6.2.2 Assessment Actions for Alerts

Once an accident has been classified as an Alert, assessment actions shall be performed in accordance with the EPIs for an Alert. These actions include:

1. Increased surveillance of in-plant instrumentation.
2. If possible, the dispatching of shift personnel to the identified problem area for confirmation and visual assessment of the problem.
3. The ~~dispatch~~mobilization of two RMTs to monitor for possible releases.
4. If a radiological accident is occurring, surveillance of the in-plant instrumentation necessary to obtain meteorological and radiological data required for calculation or estimating projected doses. This dose assessment activity continues until termination of the emergency in order that the updating of initial assessments may be provided to all concerned offsite agencies by the acting Emergency Coordinator. EPIs are provided to allow a rapid, consistent projection of doses.

6.2.3 Assessment Actions for Site Area Emergencies

The assessment actions for the Site Area Emergency classification are similar to the actions for an Alert; however, due to the increased magnitude of the possible release of radioactive material, a significantly larger assessment activity shall occur.

Specifically:

1. An increased amount of plant instrumentation shall be monitored. In particular, indications of core status shall be monitored.
2. ~~Radiological monitoring efforts shall be greatly increased. An additional~~ Previously dispatched RMTs shall ~~be mobilized~~ continue to obtain air samples and perform beta-gamma field measurements. The collection of environmental media for assessment of material, transport and deposition shall be performed, as necessary, by qualified FirstEnergy personnel.
3. Dose assessment activities shall be conducted more frequently, with an increased emphasis on dose projection for use as a factor in determining the necessity for protective actions. Radiological and meteorological instrumentation readings shall be used to project the dose rate at predetermined distances from the plant, and to determine the integrated dose received. In reporting the dose projections to offsite agencies, the dose rate, dose, and basis for the time used for the dose estimate should be provided. Any confirmation of dose rates by RMTs shall be reflected in reporting and/or revising dose estimate information provided to offsite agencies.

Dose projections shall be considered by plant personnel in relation to the EPA PAGs. Reporting of assessments to offsite authorities shall include the relationship of dose to these guidelines. EPIs are provided for recording all pertinent information.

6.2.4 Assessment Actions for General Emergencies

Assessment actions for the General Emergency classification are to be the same as for the Site Area Emergency with some possible shift of emphasis to greater offsite monitoring efforts and dose projection efforts extending to distances much further from the plant. Additionally, since the projected doses are likely to be much closer to the EPA PAGs, greater emphasis is placed on the assessment of release duration.

6.2.5 State and County Accident Assessment

The OEMA may send field monitoring teams, equipped with all necessary field monitoring equipment, to the local area upon declaration of an Alert. Upon arrival, teams will report to a staging area designated by OEMA. Monitoring teams will then be deployed to designated field monitor locations. Additionally, Lake County Health District deploys two field monitoring teams; these

ATTACHMENT 2

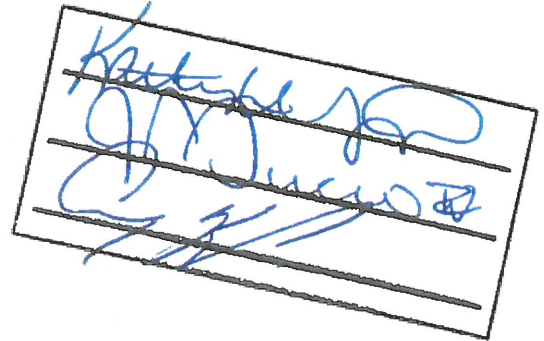
Letters of Concurrence from State and Local Authorities

(5 Pages follow)



ASHTABULA COUNTY EMERGENCY MANAGEMENT AGENCY
25 West Jefferson Street
Jefferson, Ohio 44047
(440) 576-9148 FAX (440) 576-9059
ema@ashtabulacounty.us

August 20, 2018



To: Commissioners: Kathryn Whittington
JP Ducro
Casey Kozlowski

From: Mike Fitchet Director EMA 
Re: Approval Request –PNPP License Updated Amendment Request

At our Tri-County (Lake, Ashtabula, and Geauga) EMA Directors meeting in October, emergency planners from the Perry Nuclear Power Plant advised they are seeking to make four changes to the current PNPP Radiological Response Plan (RERP). We received a revised request modifying our original approval in December (attached). However before submitting to the NRC, agreement is needed from the three counties that compromise the 10-mile Emergency Planning Zone around the plant. To help expedite the process, I asked for a written description specifically detailing what plan changes were being sought and their rationale. Same is attached.

After thorough review of the updated revision, I have determined that the changes being proposed are reasonable and will not negatively impact the integrity of the RERP if implemented. Before any further action is taken, I want to ensure the Commission Board is engaged and also comfortable with the proposed amendments. Once that's determined I will inform the PNPP planners of Ashtabula's decision.

Thank you in advance and please let me know if you have any questions.

J.P. Ducro IV

Board of Ashtabula County Commissioners
Casey Kozlowski

Kathryn Whittington

REVISED: PNPP Emergency Plan License Amendment Request (LAR)

Scope:

The Perry Plant has revised our original License Amendment Request (LAR) to just two amendments:

Reduce the requirement of 3 on-call Radiation Monitoring Teams (RMTs) to 2 on-call RMTs.

- Two on-call RMTs is an industry standard
- Originally, the third RMT was to perform surveys at the plant, inside the protected area. Those surveys are now handled by on-site radiation protection personnel.
- If warranted, additional RMTs could be made available during the incident
- Lake County and the State of Ohio also have Field Monitoring Teams responding to the incident

Transfer the on-site first aid and rescue responsibilities from the Perry Security Section to the Perry Operations Section.

- This eliminates a collateral responsibility from Security who are required to maintain focus on protection of the plant and nuclear fuel.
- Perry Operations is currently trained in first aid and rescue as part of their normal responsibilities.

Peterson, Roger <RPeterson@CO.GEAUGA.OH.US>

Tue 8/21/2018 12:38 PM

To: Reiter, Craig <creiter@firstenergycorp.com>;

Craig-

Geauga County is in agreement with the revisions to the LAR as outlined below.

REVISED: PNPP Emergency Plan License Amendment Request (LAR)

Scope:

The Perry Plant has revised our original License Amendment Request (LAR) to just two amendments:

Reduce the requirement of 3 on-call Radiation Monitoring Teams (RMTs) to 2 on-call RMTs.

- *Two on-call RMTs is an industry standard*
- *Originally, the third RMT was to perform surveys at the plant, inside the protected area. Those surveys are now handled by on-site radiation protection personnel.*
- *If warranted, additional RMTs could be made available during the incident*
- *Lake County and the State of Ohio also have Field Monitoring Teams responding to the incident*

Transfer the on-site first aid and rescue responsibilities from the Perry Security Section to the Perry Operations Section.

- *This eliminates a collateral responsibility from Security who are required to maintain focus on protection of the plant and nuclear fuel.*
- *Perry Operations is currently trained in first aid and rescue as part of their normal responsibilities.*

My Thanks-

Roger Peterson

Roger M Peterson

Director

Geauga County Department of Emergency Services

12518 Merritt Rd

Chardon, Ohio 44024

440-279-2170

RPeterson@co.geauga.oh.us

Board Of Commissioners
John R. Hamercheck-President, Jerry C. Cirino, Daniel P. Troy



Lake County
Emergency Management Agency
Larry D. Greene, Director

ok.
JMS
8/23/18

No Res
NEEDED -

TO: Commissioner John R. Hamercheck-President
Commissioner Jerry C. Cirino
Commissioner Daniel P. Troy
County Administrator Jason Boyd
FROM: Larry Greene-EMA *Larry Greene*
DATE: August 21, 2018
SUBJ: Revised PNPP License Amendment Request

RECEIVED
2018 AUG 21 P 2:15
BD. OF CO COM
LAKE CO., OHIO

On 11/16/2017, I submitted for your approval the attached (copy) of an NRC License Amendment Request (LAR) emergency planners at the Perry Nuclear Power Plant were seeking to the county Radiological Emergency Response Plan (RERP). At the time, the request contained four (4) amendments to the current scope of the plan.

On 8/20/2018 I was contacted by PNPP Emergency Planner Craig Reiter who advised that the plant has since revised its original request to include only two (2) proposed changes. One of these, which calls for reducing the requirement of three (3) on-call Radiation Monitoring Teams to two (2), was contained in the original request approved in 2017. The other, which proposes transfer of on-site first-aid and rescue responsibilities from PNPP Security to the Operations Section, is new and forms the basis of this correspondence.

After thorough review, I do not think either of the LAR amendments being requested will have negative impact on the county RERP if they are implemented. However, as with the first request, I want to ensure that you are comfortable with the changes being proposed. Once that's determined, I will inform PNPP planners of Lake's decision.

Thank you, in advance, and please let me know if you have any questions.

APPROVED
Commissioners *John R. Hamercheck*
PRESIDENT
Daniel P. Troy
of *J. L. C...*
Lake County, Ohio
Attest *Joseph Bell*
CLERK 8-23-18



August 21, 2018

Mr. Thomas Morse, Supervisor
Emergency Response Unit
Perry Nuclear Power Plant
PO Box 97
Perry, Ohio 44081

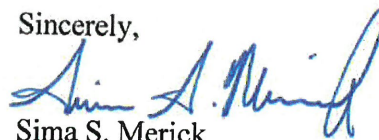
Dear Mr. Morse:

The Executive Director of the Ohio Emergency Management Agency, Sima Merick and the State of Ohio's Liaison officer to the US Nuclear Regulatory Commission, Chris Salz, have been briefed on the Perry Nuclear Power Plant's license amendment request to the US Nuclear Regulatory Commission requesting the following changes to the Emergency Plan:

1. Transfer of first aid responsibilities from the Perry Security section to the Perry Operations section.
2. The elimination of the third offsite radiation monitoring team.

The Executive Director and the State Liaison Officer understand and concur with the Perry Nuclear Power Plant's license amendment request.

Sincerely,



Sima S. Merick
Executive Director
Ohio Emergency Management Agency

Mission Statement

To coordinate activities to mitigate, prepare for, respond to, and recover from disasters