



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

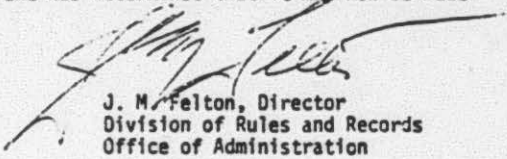
December 17, 1980

50-320 Three Mile Island

FOR ENCLOSED TO DOCUMENTS,
REQUEST DURING THE PAST MATERIAL

MEMORANDUM FOR: Chief, Document Management Branch, TIDC
FROM: Director, Division of Rules and Records, ADM
SUBJECT: PRIVACY REVIEW OF UTILITY EMERGENCY PLAN DOCUMENTATION

The Division of Rules and Records has performed a privacy review for the attached document and has determined that it may now be made publicly available.



J. M. Felton, Director
Division of Rules and Records
Office of Administration

Region 1 Incident Response
Plan. dated 2/28/79

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UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION I

INCIDENT RESPONSE PLAN

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FREEDOM OF INFORMATION ACT

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PERSONAL PRIVACY INFORMATION
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PERSONAL PRIVACY INFORMATION
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PERSONAL PRIVATE INFORMATION
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EMERGENCY CONTACT INFORMATION
REMOVED IN ACCORDANCE WITH THE
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OFFICE OF INSPECTION AND ENFORCEMENT

REGION 1

INCIDENT RESPONSE PLAN

1.0 INTRODUCTION

1.1 Purpose

The purpose of this plan is to define Regional actions for responding to incidents which involve licensed material and facilities.

1.2 Policy

- a. The actions taken in response to incidents will be planned and coordinated.
- b. Inspectors will be sent to the scene of incidents, when appropriate, to assure that actions are being taken to protect people, property, and the environment, and to safeguard licensed facilities and materials.
- c. The Regional Office will coordinate its incident response actions with ESO and with other federal agencies, will notify them of incidents which involve NRC-licensed activities, and will request their assistance, advice, and support, as appropriate.
- d. The Regional Office will provide radiological assistance to licensees and other agencies until such time as relieved by other groups with this specific responsibility (e.g., DOE-21P). In matters of life and death or those which directly affect the public health and safety, radiological responsibilities will supersede normal regulatory functions.

1.3 Objectives

The Region 1 Office of Inspection and Enforcement is directed that actions taken in response to incidents are to:

RECEIVED
GENERAL INVESTIGATIVE DIVISION
FEDERAL BUREAU OF INVESTIGATION
U. S. DEPARTMENT OF JUSTICE
WASHINGTON, D. C. 20535

- a. Establish the nature, extent, and particulars of the incident and, wherever pertinent, determine the cause.
- b. Evaluate the licensee's actions to correct problems, to mitigate the effects of the incident, to assure safe conditions of its operations, and to comply with regulatory requirements.
- c. Evaluate the licensee's implementation of preplanned actions to protect people, property, and the environment, and to safeguard licensed facilities and materials.
- d. Determine if adequate protective and corrective actions are being taken, identify any actions available to give further assurance for the protection of people and property and the security of facilities and materials and, if such conditions are identified, notify the authority or agency responsible for taking appropriate action.
- e. Obtain factual information regarding incidents as a basis for reports to the Commission, senior regulatory management, and informing the public when appropriate, and
- f. when necessary, provide radiological assistance to protect health and safety, and prevent damage to property, until properly relieved of other duties with this specific responsibility.

4. Scope

This instruction defines the responsibilities and authorities and outlines the actions of the regional staff for meeting the aforementioned objectives.

5. Definitions and Interpretations

a. Incident

An occurrence which involves a licensee, contractor, or other individual or organization, or threat to the health and safety, property, the environment, or the regulatory and safety interests of licensed material or facilities.

b. Incident Response Action Coordination Team (IRACT)

A group of NRC Headquarters officials responsible for initiating HQ incident response actions and for planning and coordinating the response to incidents at the HQ level.

c. Regional Incident Response Action Coordination Team (RIRACT)

A group of NRC-Region I management personnel responsible for initiating Region I incident response actions and for planning and coordinating the response to incidents at the regional level. RIRACT will operate in conjunction with Headquarters IRACT for all incidents which require a Level I or II response.

d. Headquarters Incident Response Center (HIRC)

A facility at NRC Headquarters which is equipped to support the Headquarters response to incidents which require extensive coordination with other agencies.

e. Regional Incident Response Center (RIRC)

The rear half of the main conference room, utilized by Regional personnel during an emergency to coordinate all response functions.

f. Onsite Inspection Team (OIT)

Team of NRC Regional Personnel (Inspectors and Investigators) who respond directly to the site, usually in response to Level I and II incidents. This team, normally under the command of the Project/Resident Inspector, is the primary onsite representative of the NRC under emergency conditions.

g. Severity Levels

Categories of incidents which are differentiated by the importance threshold, impact, and/or actual or potential consequences. The nature of the Regional response is dictated by the severity level of the incident. (See Table 1 for severity level characterizations)

h. Level I Severity Incident

An event which has an actual or imminent serious threat to public health and safety, the environment, property, or security and safeguards of licensed facilities and materials.

i. Level II Severity Incident

An event which poses a potential threat or could have significant adverse effects, such as potentially unsafe conditions at a licensed facility, or events which are threats to public health and safety, property, the environment, or the security and safeguards of licensed facilities and materials.

j. Level III Severity Incident

An event which exhibits no immediate potential threat or an event which has or could have relatively insignificant effects yet has an actual or potentially high level of public interest. Violations of regulatory requirements, malfunctions of equipment or other events reported to the Regional Office which pose no immediate threat to health and safety, property, the environment, or the security and safeguards of licensed facilities and materials.

k. Incident Response Level

Categories of response to various levels of severity of incidents which are differentiated by the speed and nature of the Regional response.

1. Level I Incident Response

Activation of the RIRACT and dispatch of an OIT within two hours of notification, to arrive at the site within six hours of initial notification.

m. Level II Incident Response

Activation of the RIRACT and dispatch of an OIT within two to four hours of notification for arrival at the site within twelve hours of initial notification.

n. Level III Incident Response

Characterized by increased Region I management attention, but does not involve activation of the RIRACT or rapid dispatch of an OIT.

o. Initial Response

The gathering, evaluating, recording, and reporting of information concerning an incident, to ascertain whether or not licensed materials or facilities are or may be involved or threatened; and to determine the incident and response levels, and if follow-up action is necessary.

p. Follow-up Action

Actions taken after the initial response to an incident notification. This action is taken with the concurrence of the Director or his representative.

q. Inquiry

Actions taken by Regional personnel in response to the initial notification of an incident. This will usually consist of a Regional inquiry and notification of appropriate Regional personnel to allow prompt determination of severity level and follow-up action.

r. Investigation

The gathering, evaluating, recording and reporting of facts and related information concerning a particular incident which involves or may involve NRC licensed materials or facilities.

s. Programmed Inspection

A detailed examination to gather, evaluate, record and report facts and information related to all aspects of construction, testing or operations at NRC licensed facilities in order to determine compliance with rules, regulations, licenses and permits of the NRC and nuclear safety matters not explicitly set out in such regulatory documents, usually for a specific purpose.

t. Special Inspection

More limited in scope as compared to a routine programmed inspection and normally conducted before the routine programmed inspection would be due.

u. Incident Response Implementation Procedures (IRIP)

Procedures utilized to implement the Region I Incident Response Plan. These procedures cover actions to be followed subsequent to the initial incident notification, including the receipt and recording of essential items of information, management notification, severity level classification, assembly of regional personnel, dispatch of inspection team, Headquarters coordination, and RIRACT operations.

v. Supplementary Procedures (SP)

Procedures utilized to maintain the Regional emergency preparedness program in a state of optimum readiness and to facilitate an emergency response. These procedures cover areas such as equipment readiness checks, use of communication equipment, emergency drills and periodic review and update.

1.6 Summary of Regional Response Actions

This plan provides for the following actions chronologically:

- a. Gathering initial information by person receiving notification of an incident;
- b. Rapid dissemination of information to Regional management;
- c. Evaluation and decision making as to appropriate severity and response level;
- d. Notification of HQ and other agencies;
- e. Assembling of Regional Incident Response Action Coordination Team;
- f. Dispatching of an Onsite Inspection Team;
- g. Subsequent information gathering, evaluation and dissemination; and
- h. Determination of appropriateness of licensee's and other's response action.

2.0 RESPONSIBILITIES AND AUTHORITIES

2.1 Administrative

- a. Director, Region I

The Director has overall responsibility for ensuring that Region I maintains a workable, current plan for responding to incidents. He will appoint a Regional Emergency Preparedness Coordinator who will report to him in all matters involving Regional Incident Response.

- b. Emergency Preparedness Coordinator (EPC)

The Emergency Preparedness Coordinator is responsible for coordinating the Region's response preparedness activities with OIE Headquarters.

c. Emergency Planning Officer (EPO) and Alternates

Operate under the general guidance of the Emergency Preparedness Coordinator. Establish, review and update the Regional Incident Response Plan. They will maintain facility emergency plans in accordance with Paragraph 3 of this instruction and will administer drills and exercises of the Plan in accordance with Paragraph 8. of this Plan. During the absence of the EPC, the EPO will act in this capacity.

d. Chief, Materials Radiological Protection (MRP) Section

Has responsibility for maintaining emergency response equipment in accordance with Paragraph 4. of this Plan.

e. Training Officer

Insures proper incident response training of Region I personnel in accordance with Paragraph 7. of this Plan.

f. Individuals

Maintain a workable knowledge of the elements of the Incident Response Plan and updated copies of applicable response procedures at their residences. Provide the EPO with any changes which may affect the correctness of information contained in the plans and procedures. Inform the Region I Security Officer of any event that they become aware of during inspections or conversations with licensees, which may be of security/safeguards interest, i.e. suspicious actions in the vicinity of facilities, theft of weapons or explosives, dissident group activity, etc.

g. Security Officer and Alternate

Review and update the Regional Incident Response Plan in conjunction with the EPO. Maintain facility security plans in accordance with Paragraph 3 of this plan. Inform ISHQ of all security related anomalies of which he becomes aware.

h. DOE-RAP, Region I (Radiological Assistance Program)

- (1) The Brookhaven Area Office of DOE, Brookhaven National Laboratory, Upton, New York is responsible for RAP in Region I. Region I RAP and Region I NRC comprise the same geographical area; therefore, coordination with only one RAP office is necessary. A copy of Region I-RAP Manual, Parts I and II, is maintained in the Office of the Region I Emergency Planning Officer.
- (2) RAP has been furnished a copy of the Region I Incident Response Plan containing names and telephone numbers of principal contacts at Region I and IE:HO. The Region I Environmental and Social Projects Section is responsible for maintaining routine liaison with RAP.

2.2 Incident Response

The Regional staff, supplemented by consultants and other federal agencies, as necessary, is qualified to perform all actions necessary to implement this Incident Response Plan. The Regional emergency response organization for a Level I or II incident will consist of an Onsite Inspection Team (OIT) and the Regional Incident Response Action Coordination Team (RIRACT). The RIRACT will operate in conjunction with Headquarters IRACT for all incidents which require a Level I or II response. For Level III incidents, the normal operating organization and duties will apply. Inherent in the RIRACT organization is the function of Incident Assessment which is collectively the responsibility of the Director, Deputy Director and responsible Branch and Section Chiefs.

a. Persons Receiving Notification of an Incident

Every individual who receives notification of an incident is responsible for accurately documenting information received and performing such actions as are outlined in the appropriate response procedures. (See IRP I)

b. **Duty Officer**

Document information received, perform preliminary evaluation of such information, and perform other actions of notification and assessment as outlined in appropriate procedures.

c. **Affected Branch Chief or Alternate**

Evaluate information and determine the severity and response level and, in conjunction with the Director, Deputy Director, et. al., determine the credibility of security/safeguards threats. Subsequently, function as the RIRC Coordinator performing such actions as are necessary to implement appropriate response procedures and insure accomplishment of the intent of this plan.

d. **Director/Deputy Director**

Evaluate information received and confirm incident severity and response levels, and evaluate credibility of security/safeguards threats. Ensure that appropriate procedures are initiated in order to effect timely response. Subsequently, serve as Region I liaison with HQ elements of IRACT to insure timely dispatch of information. Provide overall guidance and direction to the RIRACT and OIT assessment and follow-up actions, and, as appropriate, go to the incident scene.

e. **Regional Incident Response Action Coordination Team (RIRACT)**

The RIRACT, under direct leadership of the affected Branch Chief, will organize, direct, coordinate, and control the regional response actions. The RIRACT will function under the overall authority and supervision of the Director/Deputy Director, Region I. The RIRACT will support the Onsite Inspection Team (OIT) Leader and the project and specialist areas which are to be included on the OIT. (See Organization Chart.)

f. Onsite Inspection Team (OIT)

The Onsite Inspection Team, under leadership of the Team Leader (usually the principal/resident inspector for the facility/functional area) will:

- (1) Plan, organize, direct, coordinate and control the field mission related work in support of this plan in accordance with approved procedures, guides and policies; and
- (2) Provide radiological assistance to licensees or other agencies until such time as relieved by DOE RAP or other agencies with this specific responsibility. In matters of life and death or actions directly affecting public health and safety, radiological responsibilities will supersede normal regulatory functions.

g. Resident Inspector

Resident Inspectors, where such exist, will usually serve as the OIT Leader. Due to their duty station being a particular NRC licensed facility, they will normally be the first NRC representative to arrive onsite in the event of an incident. While the Resident Inspector shall be permitted to exercise judgement concerning the nature of his response actions, such actions shall be coordinated with the RIRACT.

h. Administrative Branch - Chief, Administrative Branch

Shall provide necessary administrative support services and personnel to the RIRACT and OIT on a priority basis. These services include, but are not limited to:

- (1) Clerical services;
- (2) Travel arrangements;
- (3) Funding activities;
- (4) Communications; and
- (5) Personal affairs.

J. Emergency Planning Officer

The primary functions of the Emergency Planning Officer are to serve as the data recorder in the RIRC, to assist the RIRC Coordinator in ensuring that the Incident Response Plan is implemented in a coordinated fashion and that communications are established with all appropriate parties/agencies.

k. Alternate Emergency Planning Officer(s)

The Alternate Emergency Planning Officer(s) as available, shall respond to the RIRC promptly and remain at the IRC to assist in various administrative and technical matters. They will usually assist the EPO, OIT and Communications Coordinator.

1. DOE-RAP, Region I

- (1) When RAP receives notification of an incident at an NRC licensed facility, they will telephone Region I to verify that Region I has been notified.
- (2) When Region I is notified of an incident at a licensed facility or involving licensed material, Region I will contact RAP to ascertain if radiological assistance has been requested and/or alert RAP of the reported incident.
- (3) Region I may request assistance from RAP, including a request for their presence at the scene of an incident even if the licensee and state agencies do not feel RAP is needed. A request by Region I for RAP assistance would normally be made by the RIRACT.
- (4) If both the RAP Team and Region I OIT are at the scene of an incident, the OIT Leader will establish contact with the RAP Team Leader and detail the degree and nature of assistance to be rendered.

m. Consultants

Technical and Medical Consultants may be used to assist the Region in evaluating and investigating an incident. Requests for consultants will normally be made by the RIRACT.

3.0 REGIONAL INCIDENT RESPONSE CENTER (RIRC)

The Regional Incident Response Center is located on the second floor of the Region I office building in the rear half of the main conference room.

ALL RIRACT members, with the exception of the PAO, will operate from the RIRC. The PAO will utilize his own office.

The RIRC is equipped with necessary administrative materials and equipment to support RIRACT actions.

4.0 EQUIPMENT

Equipment is available within the Region for the purpose of radiation monitoring and performing independent measurements at the scene of an incident. The extent and type of independent measurements will be determined by the OIT Leader as advised by the RIRACT. Where measurements exceeding the capability of the OIT are required, the RAP team may be required to provide necessary assistance. The Section Chief, MRP, in conjunction with the Emergency Planning Officer, is responsible for maintaining sufficient equipment in readiness for possible Regional Emergency Response. Each professional employee is supplied with, and is responsible for, his film badge. Self-reading pocket dosimeters are available in the OIT emergency kit.

In addition to Facility Emergency and Security/Contingency Plans Files, equipment to assist the RIRACT in incident assessment such as computer facilities, will be evaluated and incorporated as necessary.

Emergency equipment will be inventoried and checked for operability quarterly and after each use. The Chief, MRP Section has this responsibility.

5.0 EMERGENCY TRANSPORTATION

Transportation for rapid dispatch of the Onsite Inspection Team is available from various governmental, commercial and private sources. The particular form utilized will be dependent upon:

1. The desired rapidity of the response;
2. Distance to the incident scene;

- c. Prevailing weather conditions;
- d. Availability; and
- e. Time of day.

Region I has an emergency vehicle organic to its organization. This vehicle is equipped with emergency lights, siren, and mobile radio-telephone. Commercial airline transportation is available at the Philadelphia-Wilmington National Airport, a distance of 28 miles from Region I. Other rotary and fixed-wing aircraft are available from local charter services upon short notice.

Landing areas for aircraft transportation other than commercial airlines have been arranged as follows:

- a. Perkiomen Valley Airport - Collegeville, Pennsylvania (rotary and fixed wing)
- b. Wings Field - Blue Bell, Pennsylvania (rotary and fixed wing)

6.0 FACILITY EMERGENCY AND SECURITY/CONTINGENCY PLANS FILE

The Regional Emergency Planning Officer will maintain Emergency Plans and maps with directions to the various sites for: Each Category B and C facility, as they are made available; Fuel Facilities; designated Priority I materials licensees; Each state within the Region; and RAP Manual, Parts I and II. These plans and maps are located in the Office of the Emergency Planning Officer.

The Regional Security Officer will maintain Security/Contingency Plans for each Security/Safeguards priority I through V facility. Security plans are located in a Class IV security cabinet situated in the alarmed room of the Region I Travel Section.

7.0 REVIEW AND UPDATING

7.1 Regional Incident Response Plan and Implementing Procedures.

- a. The Region I Incident Response Plan and Implementing Procedures will be reviewed quarterly per Regional Office Instruction 1800/5. The Emergency Planning Officer will prepare any needed revisions. All Region I personnel are responsible for submitting recommended changes and/or corrections to information which is in error. Individuals should inform their respective Branch Chief by memo at their first opportunity.

7.2 Facility Plans

Once each calendar year, the responsible Emergency Planning/Security Inspector(s) should determine if there have been any changes in facility emergency and security/contingency plans or procedures. If so, updated versions of the facility plans should be obtained and posted.

8.0 EMERGENCY EXPOSURE GUIDANCE

8.1 Onsite

Appendix A contains emergency action guidance and provides instructions and background information for use in evaluating actions taken concerning the rescue and recovery of persons and protection of health and property during emergencies. This guidance is applicable for the onsite NRC personnel who become directly involved in the saving of human life or protection of health and property. It is to be used as background information and guidance when making an assessment or evaluation of the emergency actions being taken or considered by the licensee or other responsible organizations when such actions involve probable radiation exposure to personnel. Personnel at the scene must take care to limit their activity and involvement to that of objective observation, evaluation and investigation and avoid being directly involved in directing or ordering actions by the licensee or other agencies unless the licensee's organization significantly breaks down.

8.2 Offsite

Appendix B contains EPA's "Protective Action Levels" for persons in the environs of an incident resulting in a major release of radioactive material. These protective action levels may be used as guidance in evaluating actions to protect the public.

9.0 DECONTAMINATION

Appendix C contains Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Excesses, Source, or Special Nuclear Material. Although not intended for emergency use, these guidelines may be used as a baseline information of and what levels of contamination levels prior to release for unrestricted use.

10.0 TRAINING

10.1 Initial

All Region 2 employees will receive training in this plan. The initial training sessions devoted to this plan are taped and available in the Region 2 library. These tapes, in conjunction with a training quiz and discussions with Senior staff members are mandatory for new employees assigned to the Region, and shall be completed within 3 months of the reporting date.

10.2 Refresher

Each Regional staff member will attend a refresher training course tailored to his specific Incident Response Plan duties and responsibilities every 12 months. These refresher courses will be conducted by or under the supervision of the Emergency Preparedness Coordinator and Emergency Planning Officer.

11.0 DRILLS

11.1 Notification and Communications

An unannounced notification and communications drill will be conducted at least once every three months and may be performed in conjunction with the annual Incident Drill. This drill will include telephone notifications of the command and agencies necessary to activate the RIAI and ICI.

11.2 Incident Drill

A large-scale unannounced drill will be conducted on an annual basis to evaluate the structure of incident response facilities, equipment and procedures and to evaluate assigned staff members of Region 2 and determine how they act and respond in their role relative to the Regional Incident Response Plan during the simulated incident. The drill will be detailed so that simulated response actions, coordination and supporting activities can be evaluated fully. Specific objectives cover the planning, execution and review of the exercise.

11.3 Critiques

After each drill or actual incident, a critique session will be held to evaluate the Regional response and provide input for corrective modifications as needed. The Emergency Coordinator and the Emergency Planning Officer will be responsible for the coordination of all corrective actions in this regard.

11.4 Records

- a. Communications/notification drills will be documented. The records of such drills will consist of the name of the person making the call, the date and time of the call, and the name of the individual responding to the notification. The date and time the individual called is reached will also be recorded. If any changes are required, they will be noted for evaluation and corrective action. All documents will be kept on file by the Emergency Planning Officer.
- b. Documentation for the annual large-scale drill will consist of observer and summary comments of the evaluation meeting conducted subsequent to the drill. These records will be kept on file by the Emergency Planning Officer and used as a basis for initiating any needed corrective actions.

12.0 RELEASE OF INFORMATION TO THE PUBLIC

12.1 Objective

The principal public information objective following an incident is to promptly provide all available facts that can be issued within the framework of security, particularly any facts involving possible hazards to the public. As concerns the Commission, meeting this objective is normally the responsibility of the Public Affairs Officer (PAO). Appendix D contains specific guidance.

12.2 Licensee Announcements

Normally, an announcement will be issued by the licensee, i.e., the licensee should be encouraged to designate an individual or group within his organization for coordinating release of information to the public. The licensee will be requested to make the necessary information concerning the incident available to the public; even if he does not, a release may be made by the Commission.

The licensee public relations staff is not a spokesman for the NRC Regulatory Staff involvement in an incident. The PAO will respond to news media inquiries concerning the activities of the NRC of any NRC employee, and such questions should not be referred to licensee public relations personnel.

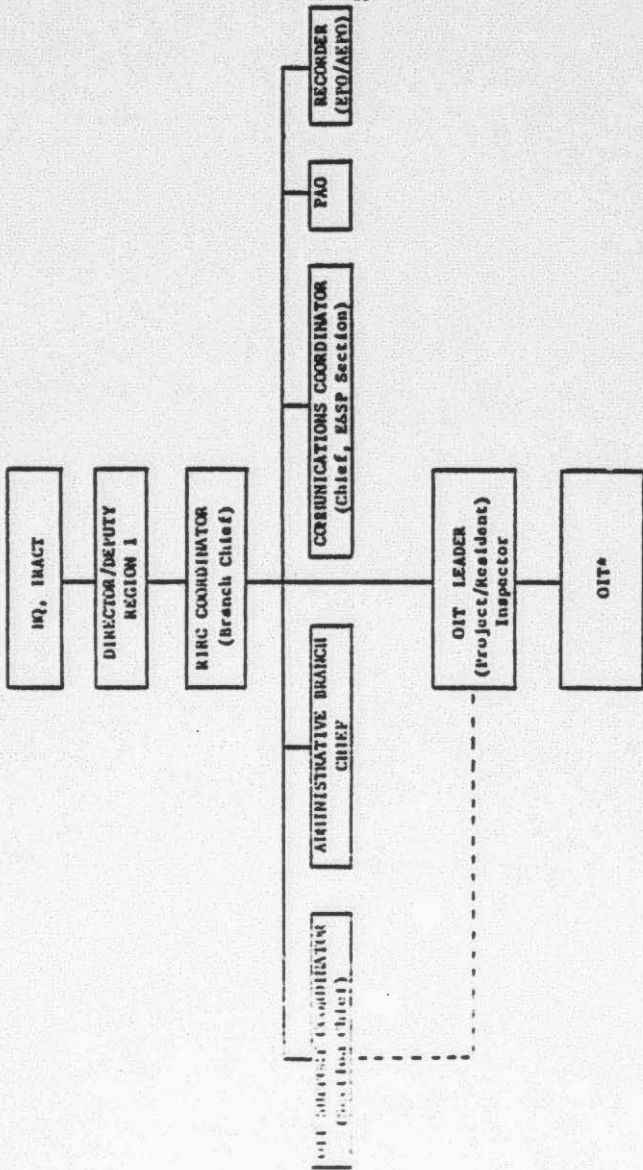
The PAO may refer some questions about the licensee's property or personnel to the licensee public relations staff. The licensee's public relations personnel usually will make texts of licensee press releases available to the NRC-PAO at the time of issuance to the public. The PAO will inform the Licensee's PR staff of NRC announcements at the time of issuance.

12.3 OIT

The OIT members, as representatives of the NRC, may receive requests for information or be questioned by the news media. If the RAP team is present, their organization usually includes a Public Affairs Officer. If pressed by the media, and in the event a Public Affairs Officer is not present, the OIT Leader may provide basic factual information while avoiding speculation and personal opinions. However, any information developed by the OIT, which concerns Regulatory activities, should be coordinated and discussed with the Director prior to release. Appendix D contains guidance for the release of information concerning an incident.

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REGIONAL INCIDENT RESPONSE ORGANIZATION



*Specific composition of the OIT will be determined by the RIRACT and tailored to the nature of the incident.

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CHARACTERIZATION OF IN. SEVERITY LEVELS

Level I	Level II	Level III
<u>SPECIAL NUCLEAR MATERIAL</u>		
Loss of control of strategic quantities of SNM.	Involves loss of control of less than strategic quantity of SNM.	
Overt act to steal or divert strategic quantity of SNM.	May require assistance of local, State, or Federal agencies.	
Requires assistance by local, State, and Federal agencies.		
<u>TERRORIST ACTS AND THREATS</u>		
Any overt or covert act, or CREDIBLE threat of an action, which could have serious consequences or effect on people, property, or the environment, or on the security and safeguard of licensed facilities and materials.	Any threat is treated as Level II until determined credible or unlikely.	
	Any attempted act, or threat of an action which could affect health and safety, property, or the environment, or the security and safeguards of licensed facilities and materials.	

CHARACTERIZATION OF INCIDENT SEVERITY LEVELS

Level I	Level II	Level III
<u>GENERAL</u>	<p>Potential for offsite effects; no immediate threat.</p> <p>May require notification of other agencies.</p> <p>May involve temporary loss of controls; no threat offsite.</p> <p>Adverse effect onsite, may involve injury to employee.</p> <p>High public interest.</p>	<p>Effects confined to areas onsite.</p> <p>Minor effects on operation.</p> <p>Minor effects involving employees.</p>
<u>MAJOR INCIDENTS</u>	<p>Property loss which may require curtailment of operation.</p> <p>May affect people onsite; may involve injury or fatality.</p> <p>May involve loss of control but threat confined to the site.</p>	<p>Minimum effect or damage, may involve brief interruption of operations.</p> <p>No involvement of radioactive or hazardous material.</p>
<p>Incident serious threat to the public or environment.</p> <p>Requires notification of other agencies for support and assistance.</p> <p>Significant effect to several persons, with fatality or serious injuries.</p> <p>Major property loss with disastrous effect on the facility or operation.</p> <p>Many persons affected with fatalities or serious injuries.</p> <p>Possibility of loss of control and threat to offsite areas or public.</p>		

RECEIVING, RECORDING AND REPORTING INCIDENT INFORMATION

1.0 IMMEDIATE ACTIONS

a. Resident Inspector

- (1) If a Reactor/Facility Operations, Radiological, or Security/Safeguards incident either IN PROGRESS OR COMPLETED, record information on Attachment 1.
- (2) If a THREAT to the Security/Safeguards of licensed materials or facilities, record information on Attachment 2.
- (3) Contact the Regional Duty Officer, if off hours, or your Section Chief, if duty hours.
- (4) Verify that the Regional Office has been notified.
- (5) Relay details as you have them.
- (6) Discuss your plan of action and detail plans for future contact with the Regional Office.
- (7) Implement IRIP-6, Paragraph 3.0.

b. Regionally Based Personnel

- (1) If a Reactor/Facility Operations, Radiological, or Security/Safeguards incident either IN PROGRESS OR COMPLETED, record information on Attachment 1.
- (2) If a THREAT to the Security/Safeguards of licensed materials or facilities, record information on Attachment 2.
- (3) If:
 - (a) Not familiar with the voice/identity of the caller, verify the authenticity of the notification using appropriate telephone numbers in Appendices F, G and H as applicable.
 - (b) A threat or notification that a threat has been made, call the agency who relayed the threat then notify licensee.

- (4) Contact appropriate Branch Chief or alternate and relay information. If unable to make this contact within 10 minutes, implement the Branch Chief's actions as detailed in Paragraph 2.0.

		Office	Home
Reactor Incident - Operational	Eldon J. Brunner	5240	[Redacted]
Radiological Incident	George Smith	5200	
Security/Safeguards Incident	Walt Martin	5230	

2.0 SUBSEQUENT ACTIONS

a. Branch Chief

- (1) Record information on Attachment 1 or 2, as appropriate.
- (2) Assign a severity level using the listed Attachments:
 - (a) Reactor/Facility Incident - Attachment 3.
 - (b) Radiological Incident - Attachment 4.
 - (c) Security/Safeguards Incident in PROGRESS OR COMPLETED - Attachment 5.
- (3) If a Security/Safeguards THREAT, DO NOT ASSIGN A SEVERITY LEVEL, RATHER PROCEED DIRECTLY TO the next step of this procedure.
- (4) Contact the Director, (Home [Redacted]), Deputy Director (Home [Redacted]) or alternate. If necessary, call answering service and request page. Provide him with incident evaluation, your severity level recommendation and request decision to activate/not activate the RIRC. If Director/Deputy or alternate has not been contacted within 15 minutes, function for the Director.
- (5) If a Severity Level I or II or a threat, initiate IRIP-2. Full activation of the RIRC beyond IRIP-2 notifications will only be accomplished on the order of the Director.

INCIDENT NOTIFICATION INFORMATION

1. Date notification received _____
2. Time notification received. _____
3. Method by which notification was received. _____
5. Name and address of licensee, company, facility, or individual involved.

6. Type and character of incident.

7. Date of incident. _____
8. Time of incident. _____
9. Location of incident. _____
10. Name, location, affiliation and telephone number of individual reporting the incident to the NRC.

14. Names, titles and locations of local officials and agencies who have been informed or are aware of the incident and the date and time they were notified and if they are providing any assistance.
15. Names, titles, and locations of Federal officials and agencies who have been informed or are aware of the incident and the date and time they were notified, and if they are providing any assistance.
16. If radiological assistance has been requested, the date and time notification was made and by whom, and whether or not a team is responding.

INITIAL NOTIFICATION INFORMATION - THREATS TO SECURITY/SAFEGUARDS

1.0 Complete this section ONLY if you receive notification of a threat from the NRC, FBI, ERDA, CIA or Licensee. If from the perpetrator or third party, go to paragraph 2.0.

- a. Date notification of threat received. _____
- b. Time notification of threat received. _____
- c. Method by which notification was received. _____
- d. Name and address of target, licensee, company, facility or individual.

e. Nature of the threat.

- f. Has the reporting agency determined whether the threat is:
Credible _____, Incredible _____, Credibility not evaluated _____.
- g. If the reporting agency has determined the credibility of the threat, what information and logic was used to make this determination.

Attachment 2
(IRIP - 1)

- h. Record all additional information that the informing agency has concerning the threat. (When will the threat be carried out, why is the threat being made, what demands have been made, who will be carrying out the threat, etc.)

- i. Name, address, affiliation and telephone number of individual notifying you of the threat.

- j. Names, titles and locations of local officials and agencies who have been informed or are aware of the threat and the date and time they were notified and if they are providing assistance.

- k. Names, titles and locations of Federal Officials and Agencies who have been informed or are aware of the threat and the date and time they were notified, and if they are providing assistance.

1. If radiological assistance has been requested, the date and time notification was made and by whom, and whether or not a team is responding.

- 2.0 Use the following section if you receive a threat or threat notification directly from the perpetrator or from a third party other than those listed in paragraph 1.0.

REMEMBER, WHEN DEALING WITH THESE INDIVIDUALS, YOUR QUESTIONING SHOULD REFLECT THE ATTITUDE, "WE RECEIVE MANY HOAX THREATS LIKE THIS. IF YOU WANT ME TO BELIEVE YOU, CONVINCE ME THAT YOU REALLY CAN AND WILL CARRY OUT THE THREAT."

THE PURPOSE OF THIS APPROACH IS NOT TO COMPROMISE THE PERPETRATOR'S MISSION, BUT RATHER TO ENTICE HIM INTO GIVING GENERAL CLUES TO HIS GENERAL INTELLIGENCE, TRAINING, PLANNING AND MOTIVATION FOR ASSISTING IN THE ASSESSMENT OF THREAT CREDIBILITY.

a. Date threat is received. _____

b. Time threat is received. _____

- c. Name and address of target licensee, facility, company, material or individual.

- d. Method by which threat was received. _____

- e. Nature of the threat.

- f. Was this threat relayed to you by the PERPETRATOR _____
OTHER THIRD PARTY _____

- g. If the threat was relayed to you by a third party, what is his name, address, company affiliation; how did he become aware of the threat. MAKE HIM BE SPECIFIC, dates, times, etc.

- h. When is the threat to be carried out? _____

- i. What does the perpetrator say must be done to prevent his carrying out the threat?

- j. How does the perpetrator plan to carry out the threat?

REACTOR/FACILITY INCIDENT SEVERITY LEVEL CLASSIFICATION GUIDE

Reactor/Facility incidents may involve release of radioactive material and/or exposure of individuals. If such is the case, refer to Page 1-12 and determine if severity level should be escalated.

Event and Threshold Severity Level

1. PLANT SYSTEMS AND OPERATIONS

- | | |
|---|-----|
| a. Design Basis Accident | I |
| b. ECCS or safety system failure during operation when required to function. | I |
| c. Accidental Criticality - <u>FUEL FACILITY</u> | I |
| d. Violation of safety limit with no release of radioactivity or radiation exposure during operation. | II |
| e. Failure of reactor protection system to function during operation. | II |
| f. Loss of integrity of primary containment during operation. | II |
| g. Abnormal degradation of fission product boundary. | II |
| h. Accidental Criticality - <u>REACTOR</u> | II |
| i. ECCS or safety system failure during periodic test. | III |
| j. Violation of safety limit during periodic test. | III |
| k. Exceeding a limiting condition of operation. | III |

2. FIRES, EXPLOSIONS, INDUSTRIAL ACCIDENTS AND NATURAL PHENOMENA

- | | |
|--|----|
| a. Events which affect a nuclear plant or other activity to the extent that there is an imminent serious threat with offsite consequences. | I |
| b. Deaths <u>NOT DUE TO RADIATION</u> . | II |

Event and Threshold

Severity Level

- c. Events which affect a nuclear plant or activity forcing curtailment of operation but which poses no immediate threat of offsite consequences. II
 - d. Events with relatively minor effects confined to the site; may involve brief interruption of operations. III
3. ENVIRONMENTAL
- a. Significant impact or damage serious enough to require immediate action of the plant to curtail damage. II
 - b. Violations of Environmental Technical Specifications. III

RADIOLOGICAL INCIDENT SEVERITY CLASSIFICATION GUIDE

<u>Event and Threshold</u>	<u>Severity Level</u>
1. <u>DEATHS</u>	
a. Due to radiation.	I
b. <u>NOT</u> due to radiation.	II
2. <u>RELEASES OF RADIOACTIVITY: ONSITE</u>	
a. > 5000 times 10 CFR 20, Appendix B, Table I limits (predicted or measured).	II
b. > 500 times 10 CFR 20, Appendix B, Table I limits.	III
c. Any unplanned or uncontrolled release not meeting the above thresholds.	III
3. <u>RELEASES OF RADIOACTIVITY: OFFSITE</u>	
a. > 5000 times 10 CFR 20, Appendix 3, Table II limits.	I
b. Any release where it is believed that members of the public may receive ≥ 1 rem whole-body or ≥ 5 rem to the thyroid.	I
c. Any release which causes or may cause restriction on the use of land, crops or equipment in unrestricted areas.	I
d. > 500 times 10 CFR 20, Appendix B, Table II limits.	II
e. Any release where it is believed that members of the public could receive ≥ 0.5 rem whole-body or ≥ 1.5 rem to the thyroid.	II
4. <u>RADIATION EXPOSURES TO MEMBERS OF THE GENERAL PUBLIC</u>	
a. ≥ 5 rem whole body, 30 rem skin or 75 rem to an extremity of <u>ONE INDIVIDUAL</u> .	I
b. ≥ 0.5 rem whole body, 3 rem skin or 7 rem extremity to <u>MORE THAN ONE INDIVIDUAL</u> .	I

<u>Event and Threshold</u>	<u>Severity Level</u>
c. ≥ 0.5 rem whole body, 3 rem skin, 7 rem extremity to <u>ONE INDIVIDUAL</u> .	II
d. < 0.5 rem whole body, 3 rem skin, 7 rem extremity to <u>ONE INDIVIDUAL</u> .	III
5. <u>RADIATION EXPOSURES TO LICENSEE EMPLOYEES</u>	
a. Any life-threatening dose.	?
b. ≥ 25 rem whole body, 150 rem skin, 375 rem extremity to exposure resulting in total person-rem equivalent to one individual.	II
c. ≥ 5 rem whole body, 30 rem skin, 75 rem extremity or exposure resulting in total person-rem equivalent to one individual.	III
d. Exposures to a group of individuals > 1.25 rem whole body, 7.5 rem skin and 18.75 rem extremity and group person-rem > 25 rem whole body, 150 rem skin and 375 rem extremity.	II
e. ≥ 5 rem whole body, 30 rem skin, 75 rem extremity to individual employee.	III
6. <u>TRANSPORTATION: NCM-SHM</u>	
a. Vehicle accident with loss of control and release of radioactive materials resulting in substantial hazard.	I
b. Radioactive contamination in excess of 0.01 uCi (22,000 dpm) per 100 cm ² on shipped packages.	II
c. Vehicle accident without loss of control or release of radioactive material or minimal hazard results.	II
d. Events involving licensed material in quantities and under circumstances where health and safety hazards may result.	II

SECURITY/SAFEGUARDS SEVERITY LEVEL CLASSIFICATION GUIDE FOR ACTS IN
PROGRESS OR COMPLETED

THIS TABLE IS NOT TO BE USED TO CLASSIFY THREATS

<u>Event and Threshold</u>	<u>Severity Level</u>
1. <u>TERRORIST ACT</u>	
a. Any act which has the apparent intent of destroying or disrupting operations.	I
b. Bombing, sabotaging or otherwise disrupting operations.	I
c. A kidnapping with a demand for SIM as ransom.	I
d. Breach or compromise of physical barriers or alarm systems at a facility.	I
e. Detonation of a nuclear device or dispersal of material.	I
f. An attempt to breach or compromise physical security barriers or alarm systems at a facility.	II
g. Labor unrest, including either strikes or civil disturbances, when events affect facility operation.	II
2. <u>TRANSPORTATION: SIM OR HLW SHIPMENTS</u>	
a. Hijack of SIM or HLW shipment.	I
b. Theft of any quantity of SIM from a shipment.	I
c. Vehicle accident with loss of control and release of material.	I
d. Loss of contact with shipment and location is not known and cannot be found.	I
e. Attempted hijack of SIM or HLW shipment.	II
f. Vehicle accident without loss of control or release of material.	II

Event and Threshold

Severity Level

- g. Vehicle accident with indication of attempted theft or sabotage. I
 - h. Attempted theft of SNM from shipment. II
 - i. Communications equipment failures. II
 - j. Delayed arrival of SNM or HLW due to climatic conditions or mechanical breakdown. III
3. LOSS, THEFT, OR DIVERSION OF SNM OR HLW
- a. Strategic quantities (≥ 2 Kg Pu and/or 5 Kg U²³⁵ enriched $\geq 20\%$). I
 - b. MUF is 2 or more times the limit of error associated with the MUF. II
 - c. Less than strategic quantities. II
 - d. Known fraudulent records and accounts of SNM. II
 - e. Limit of error associated with the LEMUF exceeds limits specified in regulations or license conditions, or MUF < 2 times the LEMUF. III

RIRC ACTIVATION

1.0 ACTION LEVEL

Implement for all Level I or Level II incidents and threats as follows:

- a. If RIRC is to be activated implement entire procedure.
- b. If RIRC is NOT to be activated, only perform informational notifications of those persons listed in paragraph 2.0.b.(2) and 2.0.c., below.

2.0 IMMEDIATE ACTIONS

a. Director/Deputy Director

- (1) Notify HQ and inform them that RIRACT is being activated. (301) 432-8111.
- (2) Proceed to RIRC.

b. Responsible Branch Chief

(1) Duty Hours

Contact the Region I operator and have her make the following announcement:

ATTENTION ALL PERSONNEL. WILL THE REGIONAL INCIDENT RESPONSE ACTION COORDINATION TEAM PLEASE ASSEMBLE IN THE INCIDENT RESPONSE CENTER IMMEDIATELY. (Repeat twice).

(Branch Chiefs, Section Chiefs, Emergency Planning Officer and Alternates, State Liaison Officer and the Public Affairs Officer.

(2) Off-hours

- (a) Notify the Duty Officer by calling the answering service. Inform him that there is an incident and the RIRC is/is not being activated. Instruct him to remain at his location until further notice and to contact the EPO per Paragraph 2.0.c. of this procedure.
- (b) Notify Chief, Environmental & Special Projects Section or his alternate:

J. P. Stehr or R. J. Barnes or T. Elsassner

- (c) Notify PAO: Karl Abraham (Home - Emergency Number)
(Home)
- (d) Notify the Administrative Branch Chief or alternate:
J. J. McOscar or I. T. Sallustio
- (e) Contact appropriate Section Chief - Attachment 1.
- (f) Proceed to RIRC.

c. Duty Officer

- (1) Notify EPO or alternate by telephone:

D. E. Donaldson or J. J. Kattan or R. J. Bores or C. O. Gallina

- (2) If none of the above can be contacted by telephone, call answering service and request page.

d. Chief, Environmental & Special Projects Section

- (1) Contact a Radiation Specialist - Attachment 2.
- (2) Contact an Investigator - Attachment 3.
- (3) Proceed to RIRC.

e. Emergency Planning Officer

- (1) Contact Alternate EPOs.

J. J. Korean and R. J. Bores and C. O. Gallina

- (2) Proceed to RIRC.

f. Section Chief

- (1) Contact the Project or backup Inspector - Attachment 4.
- (2) Proceed to the RIRC.

9. Administrative Branch Chief

- (1) Contact necessary administrative support personnel.
- (2) Proceed to the RIRC.

3.0 SUBSEQUENT ACTIONS

- a. If off-hours, the first RIRACT member to arrive should begin set-up of the RIRC.
- b. If the incident involves Reactor/Facility Operations, Radiological events, or Security/Safeguards incidents either IN PROGRESS OR COMPLETED, implement IRIP - 3.
- c. If the incident involves a THREAT to the Security/Safeguards of licensed materials or facilities, implement IRIP - 4 and 3 concurrently.
- d. Initiate assembly or call in of State Liaison Officer (884-6675) and necessary technical support personnel.

REGIONAL INCIDENT RESPONSE ACTION COORDINATION TEAM (RIRACT)

1.0 GENERAL

The Regional Incident Response Action Coordination Team (RIRACT) will be activated by order of the Director/Deputy Director or their representative in response to a Level I or Level II incident.

2.0 RIRACT DUTY ASSIGNMENTS, RESPONSIBILITIES AND ACTIONS

2.1 Director/Deputy Director

Maintains liaison with HQ response elements and plans, organizes, directs, coordinates and controls the overall response actions of the Region. Upon arrival at the RIRC:

- a. Receive update briefing on incident status.
- b. Establish communications with HQ, IRACT. (301) 492-7000.
- c. Direct other preliminary actions deemed necessary.
- d. Evaluate updates of OIT findings pertaining to the incident.
- e. Provide guidance for the scope and nature of RIRACT actions.
- f. Provide continuous information updates to HQ, IRACT.

2.2 RIRC Coordinator

Responsible for planning, organizing, directing, coordinating and controlling RIRACT efforts. Upon arrival at the RIRC:

- a. Brief Director/Deputy Director concerning incident status.
- b. Follow checklist (Attachment 1) to ensure that required actions and information have been or are being completed and collected.
- c. Initiate actions and information gathering per Attachment 2.
- d. Review immediate actions taken by the RIRACT and OIT elements to ensure completion.
- e. Evaluate incoming information to verify that minimum informational requirements of Attachment 2 have been met.

2.3 OIT Support Coordinator

Provides such support and coordination as is necessary to insure timely response of the OIT. Record incoming information from the OIT. Upon arrival at the RIRC, perform the following actions:

- a. Receive update briefing concerning incident status.
- b. If not previously accomplished, contact the Resident Inspector and establish a plan of action for his response actions, information gathering and future contacts.
- c. Consider diverting inspectors from neighboring facilities to the incident scene.
- d. Brief the OIT Leader prior to his departure. (Reference IRIP-6).
- e. Request Administrative Branch Chief to arrange for transportation of OIT in accordance with IRIP-5.
- f. Relay requests for personal notifications, clothing, travel advances, etc., to the Administrative Branch Chief.
- g. Record names of OIT members and determine their ETA at the incident scene and whether or not personal notifications are desired.
- h. Organize FSAR information.
- i. Obtain Site Emergency and/or Security/Contingency Plan File.
- j. Respond to OIT requests for information/assistance of a non-technical nature.
- k. Assist the Communications Coordinator by providing backup screening and routing of incoming calls.

2.4 Communications Coordinator

Establishes coordination and contacts with and disseminates information to affected State and Federal agencies. Screens and routes incoming calls. He will also assist the RIRC Coordinator in procedural aspects of the response. Upon arrival at the RIRC:

- a. If off-hours, call answering service and instruct them to have all callers concerned with the incident hang up and call back on 337-5360.
- b. Notify appropriate State agencies. (APPENDIX F)
- c. Notify appropriate Federal agencies. (APPENDIX G)
- d. Screen and route all incoming calls.
- e. Provide updated information to State and Federal agencies.

2.5 Administrative Branch Chief

Arranges for such priority administrative support as is necessary to support implementation of a Regional Incident Response. Upon arrival at the RIRC:

- a. Ensure operability of the Xerox and Facsimile machines.
- b. Call in individuals to perform administrative and clerical duties in support of RIRACT actions, if not done previously.
- c. Arrange transportation for OIT when requested by the OIT Support Coordinator in accordance with IRIP-5, and issue necessary tickets, orders and travel advances in support of OIT deployment.
- d. Arrange motel reservations and rental cars for OIT.
- e. If emergency vehicle is to be used for transportation, notify the Communications Coordinator and have him relay information to State Police.
- f. Arrange travel etc., for any backup inspectors or management personnel.
- g. Arrange to have clothing, etc. sent to team members if they were dispatched without same.
- h. Continue all aspects of administrative support, giving urgent priority to incident related matters.

2.6 Emergency Planning Officer (Recorder)

Assists the RIRC Coordinator in ensuring proper implementation of the Incident Response Plan and serves as the centralized recordkeeper for incident information. Upon arrival at the RIRC:

- a. Receive update of incident status.
- b. Post incident status board with initial information.
- c. Log, route and review all written communications.
- d. Assist IRC Coordinator in verifying that individuals of the RIRACT are performing their assigned functions per the IRIP's.

2.7 Public Affairs Officer

Performs public information duties in support of requests for information from the public and/or news media.

- a. Receive briefing from IRC Coordinator.
- b. Prepare any needed press release(s).
- c. Respond to inquiries from news media and public.
- d. Coordinate all press releases through the Director/Deputy Director and HQ, PAO.

RIRC COORDINATOR CHECKLIST - LEVEL I AND LEVEL II INCIDENTS

1. Duty Officer recalled to RIRC. _____
2. Headquarters notified. _____
3. Resident Inspector notified and plan of action set. _____
4. For Security/Safeguards threats, threat analysis performed (IRIP-4) and licensee is aware of the nature of the threat. _____
5. Review composition of OIT. (IRIP-6) _____
6. OIT (Resident) dispatched to scene of incident upon approval of Director. _____
7. Communications established between site and Regional Office and Regional Office and Headquarters. _____
8. Notify State. _____
9. Notify State Police. _____
10. Notify RAP. _____
11. FBI notified if incident involves Security or Safeguards. _____
12. Regional office of EPA notified if there was/is a release of radioactivity to offsite areas, or there is significant impact or effect on the environment. _____
13. Notify OSHA if there are personnel injuries or fatalities, or the incident involves fires, explosions, or industrial accidents. _____
14. If there are radiation exposures to people, request a medical consultant if one is needed. _____
15. Notify DOT and FAA, as appropriate, if the incident involves radioactive material in transit. _____
16. PH issued. _____
17. Press release issued. _____
18. Determine that actions are being taken and additional updated information is being gathered as required by the appropriate section of Attachment 2 of this procedure. _____

OPERATIONAL INCIDENTS

A. Actions

1. a. Determine what actions the licensee is taking to assure safe conditions at his plant or in his operation, and to protect people, property, and the environment.
- b. Determine whether the licensee has requested support and assistance, and of what kind; determine if support and assistance is being provided.
2. a. If there is a release of radioactivity to offsite areas, notify the appropriate regional office of the EPA and the State.
- b. If assistance is needed to evaluate the hazards, request radiological assistance from the appropriate ERDA Regional Coordinating Office.
3. If there are personnel injuries or fatalities involved notify OSHA and the State.
4. If there are radiation exposures to people involved, request a medical consultant if one is needed to assist in the investigation.
5. If there is significant effect or impact on the environment, notify the State and EPA.
6. If the incident involves fires, explosions, industrial accidents, notify the State and OSHA, if appropriate.
7. If the incident involves radioactive material in transit, notify DOT and FAA, as appropriate; if there is a release of radioactivity, also notify the State and EPA.

B. Information

Update and complete the information required by the format for initial notification. Use the following guidance to gather and report other information pertinent to the incident.

1. System and equipment performance.
 - a. System involved in the incident.
 - b. Component or personnel action that is proximate cause of the incident.

- c. Protective barriers that were breached, if any.
- d. Circumstances of discovery of the incident.
- e. Is or was there a risk of escalation of the incident or could this be threatened by a failure of another system or component, inaction or inadvertent action on the part of people, or a continued operation without discovery of the incident.

2. Release of radioactivity.

- a. Form and content of the release: liquid, solid, gas or mixture; and noble gas, iodines, particulates, or mixture.
- b. Curie quantity of radioactivity that was released, and the release rate and duration of release.
- c. Point(s) of release from the facility or other location of incident, and the area(s) where the activity was dispersed.
- d. Meteorological conditions at the time of release: wind direction, wind speed, and atmospheric conditions.
- e. Onsite and offsite consequences: hazards to people and property.
- f. Procedures and instrumentation used to determine release rates, dose rates, concentrations, etc., and by whom were determinations made.

3. Injuries and fatalities.

- a. The number of people involved, and the extent of their injuries; name and employers.
- b. Actions taken by the licensee to care for injured persons.
- c. Actions taken by the licensee to preclude further injuries to people.

4. Radiation exposures.

General

- a. Names, dates of birth, places of birth, sex and social security numbers.

- b. Name and address of employer, position title of exposed persons, area of facility (or other area) where the individual was working (or at) during exposure, summary of clinically discernible effects, if any.
- c. Approximate dates and times during which exposure was accumulated.
- d. Type of radiation involved (alpha, beta, gamma, etc) description of source and, where applicable, the chemical and physical form.
- e. Total estimated radiation dose rate in rem.
- f. Procedures used for converting units to measure to values of rem dose.
- g. Manner in which personnel radiation dose measurements were made (film badge, TLD, dosimeter, survey instruments, etc).
- h. Extent to which accumulated dose (or dose commitment) has exceeded permissible values.
- i. Portion of the body exposed (whole-body, extremity, etc).

Internal exposure

- j. Estimated body burden in microcuries by nuclide and isotope of interest in critical organs, in terms of: an average over one year, and the peak value.
- k. Estimated dose commitment.
- l. The biological assay procedure used in estimating the internal deposition, including the type of instrumentation.
- m. Description of the conditions and circumstances leading to the exposure, including the probable mode of entry into the body.
- n. Employee work restrictions or other operating or administrative restrictions imposed as a direct result or consequence of the incident.
- o. Any other pertinent bioassay and survey data and any interpretation of the data and information as the inspector has been able to make.

5. Environmental matters.
 - a. Description of the impact: observable effects, quantified if possible.
 - b. Duration of the impact: one-time or continuing; probability of the impact continuing unless corrective action is taken.
 - c. Cause, if known, and the corrective actions taken or proposed.
6. Fires, explosions, industrial accidents.
 - a. Part of the plant, or systems, involved in or affected by the incident.
 - b. Proximate cause of the incident, if known.
 - c. Protective barriers that were breached, if any.
 - d. Circumstances of discovery of the incident.
 - e. Damage to equipment and property; effect on operational activities.
 - f. Risk of escalation of the incident, or threat of escalation due to failure of people or equipment to act or function.
7. Transportation incidents.
 - a. Details of the circumstances and consequences of the incident, including the driver's or carrier's report if available.
 - b. Description, chemical and physical form, curies quantity of material involved, etc.
 - c. Description and identity of packaging: number of and description of containers, color, gross weight of each, size, container identification markings and seal identification, model, special permit or certificate numbers, if appropriate.

- m. Description of the conditions and circumstances leading to the exposure, including the probably mode of entry into the body.
 - n. Employee work restrictions or other operating or administrative restrictions imposed as a direct result or consequence of the incident.
 - o. Any other pertinent bioassay and survey data and any interpretation of the data and information as the inspector has been able to make.
5. Environmental matters.
- a. Description of the impact: observable effects, quantified if possible.
 - b. Duration of the impact: one-time or continuing; probability of the impact continuing unless corrective action is taken.
 - c. Cause, if known, and the corrective actions taken or proposed.
6. Fires, explosions, industrial accidents.
- a. Part of the plant, or systems, involved in or affected by the incident.
 - b. Proximate cause of the incident, if known.
 - c. Protective barriers that were breached, if any.
 - d. Circumstances of discovery of the incident.
 - e. Damage to equipment and property; effect on operational activities.
 - f. Risk of escalation of the incident, or threat of escalation due to failure of people or equipment to act or function.
7. Transportation incidents.
- a. Details of the circumstances and consequences of the incident, including the driver's or operator's report if available.

- b. Description, chemical and physical form, curies quantity of material involved, etc.
 - c. Description and identity of packaging: number of and description of containers, color, gross weight of each, size, container identification markings and seal identification, model, special permit or certificate numbers, if appropriate.
 - d. Nature of package failure if any; nature of any defects or deterioration of packaging; evidence of any tampering or improper package handling.
 - e. Health and safety hazards that exist and actions being taken to safeguard health and safety.
 - f. Names of shipping and receiving facilities and their locations.
 - g. Identification of services used for shipment: public vehicle or common carrier, and mode of shipment such as truck, rail, air, or waterway; name of the carrier and specific vehicle or car number, if applicable.
 - h. Date the shipment left shipper's facility and the original as well as revised estimated date and time of arrival.
 - i. Routing of shipment and last known location of material if incident involves receipt of a contaminated shipment.
 - j. Nature of package and/or vehicle contamination, if any.
 - k. Bill of lading or air bill numbers.
 - l. Actions being taken by shipper and/or receiver to locate missing material, and any additional actions planned.
- C. Corrective actions by the licensee.
1. If the incident resulted from a failure to follow licensee procedures or NRC rules, standards, or requirements, what actions are being taken to assure future compliance.
 2. If the occurrence resulted from a lack of or inadequate procedures, what action is being taken to correct the situation.

D. Regional Office recommendations.

1. Evaluation and comments by the Regional Office.
2. Proposed followup responsibilities, Headquarters and Regional Office.

NATURAL PHENOMENA

A. Actions.

1. a. Determine what actions the licensee has and is taking to assure safe conditions at his plant or in his operations.
- b. Determine whether the licensee has requested support and assistance, and of what kind; determine if support and assistance is being provided.
2. a. Determine what part(s) of the facility, plant, or systems were affected, and if any protective barriers were breached.
- b. Determine the extent of damage to equipment and property, and the effect on operational activities.
- c. Determine whether there is a risk of escalation of the consequences of the incident through its effect on the facility, plant, or equipment, and the risk of escalation if the licensee fails to take action or equipment fails to function.
3. a. If the incident results in a release of radioactivity to offsite areas, notify the appropriate State and regional office of the EPA.
- b. If assistance is needed to evaluate the hazards request radiological assistance from the appropriate Regional Coordinating Office of the ERDA.
4. If there are personnel injuries or fatalities involved notify OSHA and the State.
5. If there are radiation exposures to people involved, request a medical consultant if one is needed to assist in the investigation.

B. Information.

Update and complete the information required by the forms for initial notification. Use the following guidance to gather and record other information pertinent to the incident.

1. Status of facility and activity.

Describe the activity in progress or the status of the facility at the time of the incident, and the significant consequences of the incident and effect on operations.

2. Release of radioactivity.

See Section 8.2 of Operational Incidents.

3. Injuries and fatalities.

See Section 8.3 of Operational Incidents.

4. Radiation exposures.

See Section 8.4 of Operational Incidents.

C. Regional Office recommendations.

1. Evaluation and comments by the Regional Office.

2. Proposed followup responsibilities, Headquarters and Regional Office.

SECURITY/SAFEGUARD'S INCIDENTS IN PROGRESS OR COMPLETED

(SPECIAL NUCLEAR MATERIAL)

A. Actions.

1.
 - a. Determine what measures the licensee has taken in implementing his action plans for control and accounting for SNM and/or coping with safeguards threats.
 - b. Determine whether the licensee has requested support and assistance, and of what kind; determine if support and assistance is being provided.
 - c. Determine whether the licensee has notified local law enforcement agencies.
2. If the incident involves the security and safeguards of SNM, including shipments, notify the FBI and appropriate local law enforcement agencies.
3. If a shipment of SNM is involved in an accident, notify the DOT or FAA as appropriate; if there is a release of radioactivity as a result of the incident, also notify the State and EPA, and request radiological assistance from ERCA if necessary.
4. If the incident involves a quantity of MUF which exceeds 1.5 times the LEMUF limits of 70.51(e)(5) or 70.51(e)(6), instruct the licensee to:
 - a. Immediately reinventory SNM.
 - b. Initiate an investigation to determine the cause of the excessive quantity of MUF.
 - c. Report the results of the investigation to the Regional Office within 30 days.

Issue an Immediate Action Letter to confirm and document the licensee's intent to perform the above and other appropriate actions.

5. If the incident involves a quantity of MUF which exceeds 2.0 times the LEMUF limits of 70.51(e)(5) or (e)(6), instruct the licensee to:
- a. shut down the total plant involved, terminating all process operations, and remain shut down until:
 - the MUF for the material balance interval under investigation plus any MUF occurring for the operating interval between the ending inventory and the cleancut inventory is within 1.5 times the LEMUF limits; OR
 - the Director of the Regional Office provides written approval for the startup.
 - b. conduct a cleancut inventory of SNM in his possession.
 - c. not release any SNM from the site until the MUF has been resolved.
 - d. review all components of the material balance.
 - e. initiate an investigation to determine the cause of the excessive quantity of MUF.
 - f. report the results of the investigation in writing to the Regional Office Director within 30 days.

Issue an Immediate Action Letter to confirm and document the licensee's intent to perform the above and other appropriate actions.

Prepare a Preliminary Notification and transmit it to HQ Division of Field Operations.

6. Notify the FBI when warranted by any of the following:
1. discrete item(s) missing on inventory.
 2. a break-in or incident involving unauthorized access or possession which resulted in material missing upon inventory.

- c. cleanout inventory fails to resolve a material balance discrepancy of twice the associated LEMUF limits.
- d. when the MUF remains positive on several successive inventories and is not attributable to some known processing feature.

8. Information.

Update and complete the information required by the format and initial notification. Use the following guidance to gather and report other information pertinent to the incident.

1. General

- a. Description, chemical and physical form, enrichment, quantity, etc.
- b. Health and safety hazards and actions taken to protect health and safety.
- c. Date, time, and the circumstances under which the loss was noted.
- d. Date, time, and method the material is last known to have been on hand or under control.
- e. Action taken or being taken to locate the material.
- f. If applicable, the possible mechanism by which the material could have been lost, stolen, or diverted for each mechanism, the evidence existing to show that this was not the means, and practicable possibilities that exist for further determination.
- g. Based on present information, the most probable means or mechanisms for the loss, theft, or diversion.

2. Material Unaccounted For (MUF)

- a. Inventory date.
- b. Material balance period.
- c. Throughout: additions to or removals from material in process.

- d. Summary of material balance components: beginning inventory, receipts, shipments, ending inventory, material discards.
 - e. MUF limits as specified by license or regulations.
 - f. Brief summary of historical MUF experience for the licensee, including cumulative MUF for the last three material balance periods.
 - g. Licensee actions regarding shutdown of the plant involved and investigation of the possible causes of the MUF.
 - h. Remedial action the licensee is taking to reduce the MUF.
 - i. If known, the sources that contribute to the MUF.
 - j. The date when the licensee will conduct an intensive inventory including cleanout and draindown, if satisfactory explanation for the MUF cannot be made.
 - k. Date and time the licensee completed (or will complete) his audit of plant records and reports.
 - l. Corrective actions the licensee is taking to preclude a recurrence of an excessive MUF.
 - m. Date the licensee will submit a written report with results of his investigation.
 - n. Summary of any security incidents or threats in the past.
3. Shipment in transit
- a. Names of shipping and receiving facilities and their locations.
 - b. Identification of services used for shipment: public vehicle or common carrier, and mode of shipment such as truck, rail, air, or waterway; include name of carrier and specific vehicle or car number.
 - c. Date the shipment left shipper's facility and the original as well as revised estimated time of arrival.
 - d. Anticipated routing of shipment and last known location of material, or the location of the fragments.

- e. Driver's account or report of the incident.
 - f. Identification of packaging: number and complete description of containers, including color, estimated gross weight of each, size, identification markings and seal identification, model, special permit or certificate numbers, if appropriate.
 - g. Bill of lading or air bill numbers.
 - h. Nature of package and/or vehicle contamination if any.
 - i. Special protection designated for material (other than required by regulation).
 - j. Actions being taken by shipper and/or receiver to locate missing material and any additional actions planned.
 - k. Nature of package failure, if any.
 - l. Nature of any defects or deterioration of package.
 - m. Evidence of any improper package handling, or tampering.
4. Release of radioactivity
See Section B.2 of Operational Incidents.
5. Injuries and fatalities
See Section B.3 of Operational Incidents.
6. Radiation exposures
See Section B.4 of Operational Incidents.
- C. Corrective actions by the licensee.
- 1. If the incident resulted from a failure to follow licensee procedures or NRC rules, standards, or requirements, what actions are being taken to assure future compliance.
 - 2. If the occurrence resulted from a lack of or inadequate procedures, what action is being taken to correct the situation.

D. Regional Office recommendations.

1. Evaluation and comments by the Regional Office.
2. Proposed followup responsibilities, Headquarters and Regional Office.

THREATS (CREDIBLE)

A. Actions.

1. If the incident involves a theft or diversion threat (including Transportation of SNM or HLM).
 - a. Determine what measures the licensee has taken in implementing his action plans for control and accounting for SNM and/or coping with security threats.
 - b. Determine whether the licensee has requested support and assistance, and of what kind; determine if support and assistance is being provided.
 - c. Determine whether the licensee has notified law enforcement agencies.
 - d. Notify FBI.
 - e. Determine what, if any, additional security precautions should be taken.
 - f. For shipments, gather additional identifying information.
 - (1) Names of shipping and receiving facilities and their locations.
 - (2) Identification of services used for shipment: public vehicle or common carrier, and mode of shipment such as truck, rail, air or waterway, include name of carrier and specific vehicle or car number.
 - (3) Date the shipment left shipper's facility and the original as well as revised estimated time of arrival.
 - (4) Intended routing of shipment and last known location of material, or the location of the incident.
 - (5) Identification of packaging: number and complete description of containers, including color, estimated gross weight of each, date, identification numbers and seal identification, model, serial number or certificate numbers, if appropriate.

- (6) Bill of lading or air bill numbers.
- (7) Special protection designated for material (other than required by regulation).
- (8) Actions being taken by shipper and/or receiver to protect material and any additional actions planned.

2. If the incident involves a bomb threat:

- a. determine whether the licensee has implemented his emergency action plan and has initiated a search, and if local law enforcement agencies have been notified.
- b. notify the local office of the FBI.

3. If the incident involves extortion or blackmail (for example, exchange of hostages for SNM/HLW or money or exchange of SNM/HLW for money):

- a. instruct the licensee to verify SNM/HLW holdings at the facility and in transit to determine if any SNM/HLW is missing; and
- b. determine if the licensee has notified local law enforcement agencies.
- c. notify the local office of the FBI.

4. If the incident involves a nuclear threat (detonation of a device or dispersal of material):

- a. instruct the licensee to verify SNM/HLW holdings at the facility and in transit to determine if any SNM/HLW is missing; and
- b. determine if the licensee has notified local law enforcement agencies.
- c. notify the local office of the FBI.

3. Information.

Update and complete the information required by the format for internal notification. Additional information may be released to HQ or other agencies. Additional guidance may be provided concerning these areas of activity. Increased levels of alerts will be issued as determined by Joint HQ and Regional Decision.

EMERGENCY EQUIPMENT READINESS

1.0 Discussion

IE:I Emergency Equipment shall be inventoried and checked for proper operation quarterly and after each use. Calibration of emergency radiation monitoring equipment will be performed under direction and control of the Chief, Materials Radiological Protection Section (MRP). This Section Chief will also be responsible for the accountability of survey instruments assigned to Radiation Specialists for routine operations, those on loan to outside (non-IE:I) individuals, and those being calibrated, as well as updating the controlled copies of the Region I Incident Response Plan kept in the emergency kits.

All equipment shall be kept in a single location when not in use.

3.0 Procedure

3.1 Once during each calendar quarter and after each use of emergency equipment, the Emergency Planning Officer (EPO) will provide the Chief, Materials and Radiological Protection Section with an Emergency Equipment Inventory and check form (see Attachment 1).

3.2 The Chief, Materials and Radiological Protection Section or an individual assigned by him will ensure that the seals on the Emergency kits have not been broken. If seals have not been broken, items contained in the kits need not be inventoried. If seals are broken, the entire contents shall be inventoried. During each quarterly inventory, however, all instruments shall have the batteries replaced and be checked for proper operation, any changes to the plan, procedures or other documents shall be noted and the kits resealed.

3.3 During the first calendar quarter and after each use, the seals shall be broken on the Emergency kits and a complete inventory and check of the equipment and documents contained therein shall be performed. The kits will then be resealed.

3.4 The complete Emergency Equipment Inventory/Check form will be returned to the EPO by the close of business of the last day of the calendar quarter.

3.5 All Inventory Forms will be kept on file by the EPO until a copy has been made of the forms.

3.6 The initiation of action necessary to repair/replace defective/missing equipment will be the responsibility of the EPO.

INCIDENT RESPONSE EQUIPMENT
INVENTORY AND OPERATIONAL CHECK LOG

NO. REQ.	NO. FOUND	OP. RADIUS	CAL. INT.	CORRECTIVE ACTION(S) TAKEN/PLED
1				
6				
6 pr				
6 pr				
2 box				
2				
2 stp				
4 rls				
1 pr				
3				
1				
3				
2				
1				
1				
1				
1				

INCIDENT RESPONSE SUPPORT
INVENTORY AND OPERATIONAL CHECK LOG

NO.	NO. FOUND	OPERATIONAL	CAL DATE	CORRECTIVE ACTION(S) TAKEN/NEEDED
1005	1	/	/	
	1	/	/	
	1 r	/	/	
	1 r	/	/	
	2	/	/	
	10	/	/	
	1	/	/	
	1	/	/	
	1	/	/	
	1	/	/	
	1 r	/	/	
	2 rls	/	/	
	1 pk	/	/	
	1 pk	/	/	
	1 ball	/	/	
	1 pk	/	/	
	2 pks	/	/	

**INCIDENT RESPONSE EQUIPMENT
INVENTORY AND OPERATIONAL CHECK LOG**

SP-1

NO. REQ.	NO. FOUND	OPT/ADLI	CAL DUE	CORRECTIVE ACTION(S) TAKEN/NEEDED
1 pk.		/	/	
1		/	/	
2		/	/	
2		/	/	
2		/	/	
2		/	/	
2		/	/	
3		/	/	
3		/	/	
2		/	/	
2		/	/	
1		/	/	
1 cy		/	/	
1 bk.		/	/	
1		/	/	
1		/	/	

YES
DATE OF INSPECTION: 11-25-2010

**INCIDENT RESPONSE SUPPORT
INVENTORY AND OPERATIONAL CHECK LOG**

ITEM	NO. REQ.	NO. FOUND	OPERATIONAL	CAL DIF	CORRECTIVE ACTION(S) TAKEN/NEEDED
1.000 surface cleaner	1 cn				
1.000 hand cleaner	1 cn				
1.000 soap	1 rl				
1.000 brush	1				
1.000 soap, 12"	1 pr				
1.000 nap	1				
1.000 sponge nap	1				
1.000 disinfectant (medium)	1 rl				
1.000 disinfectants	2 pr				
1.000 gloves	2 pr				
1.000 gloves	2 pr				
1.000 disinfectant spray	2				
1.000 disinfectant	6				
1.000 disinfectant	6				
1.000 disinfectant	1 ball				

Page 1 of 1

INCIDENT RESPONSE EQUIPMENT
INVENTORY AND OPERATIONAL CHECK LOG

SP-1

ITEM	NO. REQ.	NO. FOUND	OPERABLE	CAL. INUE	CORRECTIVE ACTION(S) TAKEN/NEEDED
Fire Extinguishers	4				
First Aid Kit, Portable	2				
Charger for battery pack	2				
Mobile charger	1				
ELECTRICITY WIRING					
Gas	3/4 full				
Batteries					
Tool Lights					
Iron Sockets					
Emergency Lights					
Alarm					
AV system					
Oil	Full				
Water	Full				
Battery water	Full				
Tires (incl spare)	5				
Ant	1				



**INCIDENT RESPONSE EQUIPMENT
INVENTORY AND OPERATIONAL CHECK LOG**

ITEM	NO. IN Q.	NO. LOANED	OPERATIONAL	CAL. DATE	CORRECTIVE ACTION(S) TAKEN/NEEDED
Communication Boards	2				

Performed by: _____ Date: _____

Reviewed by: _____ Date: _____

Chief, Materials Radiological
Protection Section

Signature: _____ Date: _____
Emergency Planning Officer

If any of the items listed are not in good condition, please indicate the condition and the date of the last inspection.

EMERGENCY DRILLS

1.0 Discussion

Annually, the Emergency Planning Officer (EPO) with the Director's approval, will select a simulated incident which, were it to occur, would result in a Level I Emergency Response. Plans for this simulated incident will be sufficiently detailed such that simulated locations and related conditions are described fully enough to enable simulated response actions, coordination and decision making to be implemented.

After approval by the Director, appropriate non-IEI personnel (IE:HQ, RAP, States, licensees, etc.) will be contacted to determine their desire to participate. This contact will also be used to provide an update of related phone numbers. Periodically, notification drills will be conducted without prior notification of these agencies in order to evaluate their performance and the interface arrangements.

The EPO will assure that during the conduct of the drill, an adequate number of observers are stationed at strategic locations to provide necessary information to drill participants and to evaluate individual and group performance.

Evaluation of regional performance during the drill will be conducted in two phases. At the conclusion of the drill, the EPO will meet with all observers to compile and summarize observations and criticisms. This compilation will then be reviewed in detail with the Director and Senior Staff members (Branch Chiefs and Sentors). A general summary of the critique will then be presented to all IEI personnel, emphasizing areas of strength and weakness and outlining plans for remedial action and training as necessary. The EPO will be responsible for initiating all necessary remedial action and the Training Committee will be responsible for additional training.

Periodically, unannounced drills may be conducted to evaluate the reactor's response in a real emergency situation. Preparation and conduct of these drills will include Level II and III responses only.

1.1 Procedures

1.1.1 The simulated incident scenario used in a drill must be approved by the Director and the EPO.

2.2 The drill may be terminated by the Director or Emergency Planning Officer at any time.

3.0 Prerequisites

- 3.1 Prior to the conduct of the annual Level I emergency drill, all professional Region I employees will receive training sessions on their potential responsibilities as outlined in the IRP. The IE:I Training Committee will coordinate this responsibility.
- 3.2 Written approval will be obtained from the Director prior to the conduct of any drill.
- 3.3 Before initiating any emergency drill, HQ personnel shall be made fully cognizant of the intended drill and a determination made of their desire to participate and to what degree. If it is desired that the drill be unrehearsed and unannounced, applicable HQ personnel will be notified in advance but will not receive specific information concerning the time of the drill.

4.0 Procedure

- 4.1 The Emergency Planning Officer (EPO) will develop a plausible scenario to test the IE:I-IRP, to include the initial notification message (Attachment 1). This incident will normally require a Level I Resource. The EPO will provide the initial entries to the IRP Emergency Drill Critique Sheets (Attachment 2.) The Drill Planning Form and Initiation Form shall be submitted to the Director for approval.
- 4.2 The Training Officer will schedule and document required training.
- 4.3 The EPO will arrange with all non IE:I personnel for date, time and degree of participation.
- 4.4 Prior to the initiation of the drill, the EPO will brief and station the observers.
- 4.5 The EPO or an individual designated by the EPO will initiate drill if it is not being conducted concurrently with a license drill.

- 4.6 At the completion of the drill, the EPO will meet with all participants and observers to review and complete Critique Sheets and prepare summary comments.
- 4.7 The Drill Critique Sheets will be used to prepare a Drill Corrective Action Report (Attachment 3) and will be reviewed with the Director and Senior Staff (Branch Chiefs and Seniors) at a special critique and evaluation meeting. Approval for corrective action implementation will be made at this time.
- 4.8 The EPO will present the results of the aforementioned meeting to all IEI personnel. Further training will be referred to the Training Committee for action.
- 4.9 If non IEI personnel have participated in the drill, critique sheets will be presented to each group participating.
- 4.10 Originals of all forms, plans and meeting minutes will be retained in the EPO's files.

5.0 Final Conditions

- 5.1 The Incident Response Plan Emergency Drill will be completed and all phases will have been reviewed, evaluated and appropriate corrective actions initiated or completed.
- 5.2 Retraining, if required, will have been completed.

EMERGENCY DRILL PLANNING FORM

1.0 DATE AND TIME OF DRILL

2.0 SCENARIO

3.0 DATA, ACTIONS, INFORMATION AND TIME PHASING FOR SIMULATED EVENTS:

4.0 EXCEPTIONS LIST (Items that would be accomplished in an actual emergency, but will not be carried out for this drill):

5.0 AUDITORS

Name

Title

Assignment: Post/Area

5.3 SPECIAL INSTRUCTIONS TO AUDITORS

7.0 NON VAC: I AGENCIES TO BE CONTACTED DURING DRILL:

8.0 PLAN EXECUTION (List Procedures of the Incident Response Plan that will be tested)

EMERGENCY DRILL INITIATION FORM

9.0 INITIAL NOTIFICATION MESSAGE

10.0 PERSON TO WHOM ISSUED: _____

11.0 TIME: _____

Scenario Submitted: _____ Date: _____
Emergency Planning Officer

Scenario Approved: _____ Date: _____
Director

Attachment
(SP - 2)

WILL CORRECTIVE ACTION REPORT

1. DATE OF COMMUNICATION

2. EPO ACCEPTANCE/REJECTION POSITION
(IF rejected indicate why)

3. DATE CORRECTIVE ACTION
INITIATED COMPLETED

SP-2-9

Rev. 0
8/77

APPENDIX A

GUIDANCE FOR EMERGENCY RADIATION EXPOSURE

1. Purpose

The emergency action guidance given in this appendix provides instructions and background information for use in determining appropriate actions concerning the rescue and recovery of persons and the protection of health and property during periods of emergency. The guidance provided is applicable to inspectors who may become directly involved in the saving of lives or protection of health and property. In addition, the information provided herein provides guidance in assessment and evaluation of on-site actions and response related to emergency radiation exposures.

2. General Considerations

- a. The problem of controlling exposures to radiation during rescue and recovery actions is extremely complex. Performing rescue and recovery operations requires the exercise of prompt judgement to take into account multiple hazards and alternate methods of accomplishment. Sound judgement and flexibility of action are crucial to the success of any type of emergency actions. Although the guiding principle is to minimize the risk of injury to those persons involved in the rescue and recovery activities, the control of radiation exposures should be consistent with the immediate objective of saving human life, the recovery of a deceased victim, and/or the protecting of health and saving of property.
- b. The official in charge of the operation must carefully examine any proposed action involving further radiation exposure by weighing the risks of radiation insults, actual or potential against the benefits to be gained. Exposure probability, biological consequences related to dose and the number of people involved are the essential elements to be evaluated in making a risk determination.
- c. These instructions recognize that incident situations involving the saving of life will require separate criteria from that of actions required to recover deceased victims or saving of property. In the latter instances, the amount of radiation exposure to be received by persons should be controlled to meet as closely as within occupational limits.

3. Emergency Situations

a. Saving of Human Life

- (1) Attempts to rescue victims of a nuclear incident should be regarded in the same context as any other emergency action involving the rescue of victims, regardless of the type of hazard involved, i.e., where there is reasonable expectation that an individual is alive within the affected area, the course of action to be pursued should be determined by the person on site having the emergency action responsibility. He should immediately evaluate the situation and establish the exposure limit for the rescue mission accordingly. His judgement should be based upon:
 - (a) evaluation of the inherent risks by considering:
 1. the reliability of the prediction of radiation injury. This reliability cannot be any greater than the estimation of the dose. Therefore, considerations should be given to limits of error associated with the specific instruments and techniques used to estimate the dose rate. This is especially crucial when the estimated dose approximates 100 rem.
 2. the exposure expected in performing the action shall be weighed in terms of the effects of acute external whole body exposure and entry of radioactive material.
 - (b) current assessment of the degree and nature of the hazard, and the capability of reducing inherent risk from that hazard through appropriate mechanisms such as the use of protective equipment, remote manipulation equipment, or similar means.
- (2) In the course of making a decision to perform the action, the risk to rescue personnel should be weighed against the probability of success of the rescue action.
- (3) Any rescue action that may involve substantial personal risk should be performed by volunteers, and each emergency worker shall be advised of the known or estimated extent of such risk prior to participation.
- (4) See Table 1 for Labeling Code.

b. Recovery of Deceased Victims

- (1) Incident situations involving recovery of deceased victims require criteria separate from those for saving lives. Since the element of time is no longer a critical factor, the recovery of deceased victims should be well planned. The amount of radiation exposure received by persons in recovery operations shall be controlled to the maximum extent practical within existing occupational exposure guides.
- (2) In those situations where the bodies are located in areas inaccessible because of high direct radiation fields, and where the recovery mission would result in exposure in excess of occupational exposure standards contained in this part, special remote recovery devices should be used to retrieve the bodies.
- (3) In special circumstances where it is impossible to recover bodies without the entry of emergency workers into the area, the individual in charge of the recovery mission may determine it necessary to exceed the occupational exposure standards contained in this part. The planned exposure of an individual participating in the recovery should not exceed 12 rem total for the year or 5 (II-13) whichever is more limiting. (See Table I)

c. Protection of Health and Property

- (1) Where the risk (probability and magnitude) of the radiation hazard either bears significantly on the state of health of people or may result in loss of property, so that immediate remedial action is required, the following criteria should apply:
 - (a) When the person in charge of the on-site emergency action deems it essential to reduce a hazard potential to acceptable levels or to prevent a substantial loss of property, a planned exposure up to but not to exceed 12 rem for the year or 5 (II-13) whichever is more limiting may be received by individuals participating in the operation.

However, the person in charge of emergency action at the incident scene may elect under special circumstances to waive these limits and permit volunteers to receive an exposure up to but not to exceed 25 rem. (See Table 1)

- (b) Where the potential risk of radiation hazard following the nuclear incident is such that life would be in jeopardy, or that there would be severe effects on health of the public or loss of property important to the public safety, the criteria for the saving of human life shall apply.

TABLE 1

PLANNED OCCUPATIONAL EXPOSURES UNDER EMERGENCY CONDITIONS

<u>Actions</u>	<u>Dose-Limiting Recommendation</u>
<u>Life Saving Actions</u>	
Individual (whole body) Hands and Forearms	100 rems* 200 rems, additional* (300 rems total)
<u>Protection of Health and Property (Urgent but less urgent than life saving)</u>	
Individual (whole body) Hands and Forearms	25 rems* 100 rems total*
<u>Other Planned Recovery</u>	
Individual (whole body)	12 rems total for one year or 5 (N-12), whichever is more limiting**

* Reference NCRP 39

** Derived from 10 CFR 20

NOTES*

1. Other things being equal, volunteers above the age of 45 are preferred.
2. Internal exposure should be minimized by the use of the best available respiratory protection, and contamination should be controlled by the use of available protective clothing.
3. Normally emergency exposures shall be limited to once in a lifetime.

APPENDIX B

GUIDANCE FOR PROTECTIVE ACTION LEVELS FOR PERSONS OFF-SITE

1. General

Projected doses are used as reference points in evaluating actions to be taken to protect the public in the event of a major release of radioactive material. These projected doses are not acceptable doses and should not be constructed as such.

2. Protective Action Guides

The Protective Action Guides are the numerical projected doses which act as "trigger" points to initiate protective action. A protective action is an action or measure taken to avoid most of the exposure to radiation projected to occur.

3. Protective Action Level

EPA uses the term Protective Action Level and implies that there are levels above which some action should be taken. EPA recommends that for small population groups, under favorable local conditions, evacuation, as one protective action, be considered if the projected dose is between 1 to <5 rem whole body or a thyroid dose of from 5 to <25 rem. EPA's recommended protective actions are included as Attachment 1. This Guide shows three ranges. Range I is the range in which, normally, evacuation would not be indicated. Range II is a region between 1 and <5 rem whole body exposure and from 5 to <25 rem thyroid exposure where, under normal circumstances, evacuation or other protective action should be considered. Above 5 rem whole body and 25 rem thyroid, evacuation or other protective action would be indicated depending on the size of the population to be moved and resultant hazard.

RECOMMENDED PROTECTIVE ACTIONS TO AVOID WHOLE BODY AND THYROID DOSE FROM EXPOSURE TO A GASEOUS PLUME

Projected Dose (Rem) to the Population	Recommended Actions ^(a)	Comments
Whole Body <1 Thyroid <5	.No protective action required. .State may issue an advisory to seek shelter and await further instructions or to voluntarily evacuate. .Monitor environmental radiation levels.	Previously recommended protective actions may be reconsidered or terminated.
Whole Body 1 to <5 Thyroid 5 to <25	.Seek shelter and wait further instructions. .Consider evacuation particularly for children and pregnant woman. .Monitor environmental radiation levels. .Control access.	
Whole Body 5 and above Thyroid 25 and above	.Conduct mandatory evacuation of population in the predetermined area. .Monitor environmental radiation levels and adjust area for mandatory evacuation based on these levels. .Control access.	Seeking shelter would be an alternative if evacuation were not immediately possible.

(a) These actions are recommended for planning purposes. Protective action decisions at the time of the incident must take into consideration the impact of existing constraints.

APPENDIX C

GUIDELINES FOR DECONTAMINATION OF FACILITIES AND EQUIPMENT
PRIOR TO RELEASE FOR UNRESTRICTED USE
OR TERMINATION OF LICENSES FOR BYPRODUCT, SOURCE, OR SPECIAL NUCLEAR MATERIAL

U. S. Nuclear Regulatory Commission
Division of Fuel Cycle and Material
Safety
Washington, D.C. 20555

December, 1975

The instructions in this guide in conjunction with Table I specify the radioactivity and radiation exposure rate limits which should be used in accomplishing the decontamination and survey of surfaces of premises and equipment prior to abandonment or release for unrestricted use. The limits in Tables I and II do not apply to premises, equipment, or scrap containing induced radioactivity for which the radiological considerations pertinent to their use may be different. The release of such facilities or items from regulatory control will be considered on a case-by-case basis.

1. The licensee shall make a reasonable effort to eliminate residual contamination.
2. Radioactivity on equipment or surfaces shall not be covered by paint, plating, or other covering material unless contamination levels, as determined by a survey and documented, are below the limits specified in Table I prior to applying the covering. A reasonable effort must be made to minimize the contamination prior to use of any covering.
3. The radioactivity on the interior surfaces of pipes, drain lines, or ductwork shall be determined by making measurements at all traps, and other appropriate access points, provided that contamination at these locations is likely to be representative of contamination on the interior of the pipes, drain lines, or ductwork. Surfaces of premises, equipment, or scrap which are likely to be contaminated but are of such size, construction, or location as to make the surface inaccessible for purposes of measurement shall be presumed to be contaminated in excess of the limits.
4. Upon request, the Commission may authorize a licensee to relinquish possession or control of premises, equipment, or scrap having surfaces contaminated with materials in excess of the limits specified. This may include, but would not be limited to, special circumstances such as razing of buildings, transfer of premises to another organization continuing work with radioactive materials, or conversion of facilities to a long-term storage or standby status. Such requests must:
 1. Provide detailed, specific information describing the premises, equipment or scrap, radioactive contaminants, and the nature, extent, and degree of residual surface contamination.
 2. Provide a justification and safety analysis which reflects the residual levels of materials on surfaces unless, otherwise, it shows justifications such as radioactive use of the materials, abandonment of sites, and other factors to be considered in the determination of the residual levels of the materials.

5. Prior to release of premises for unrestricted use, the licensee shall make a comprehensive radiation survey which establishes that contamination is within the limits specified in Table I. A copy of the survey report shall be filed with the Chief, Materials Branch, Division of Fuel Cycle and Materials Safety, USNRC, Washington, D.C. 20555, and also the Director of the Regional Office of Inspection and Enforcement having jurisdiction. The report should be filed at least 30 days prior to the planned date of abandonment. The survey report shall:

- a. Identify the premises.
- b. Show that reasonable effort has been made to eliminate residual contamination.
- c. Describe the scope of the survey and general procedures followed.
- d. State the findings of the survey in units specified in the instruction.

Following review of the report, the NRC will consider visiting the facilities to confirm the survey.

TABLE I

ACCEPTABLE SURFACE CONTAMINATION LEVELS

ISOTOPES ^a	AVERAGE ^{b c f}	MAXIMUM ^{b d f}	REMOVABLE ^{h e f}
Th-230, U-235, U-238, and their stable decay products	5,000 dpm α /100 cm ²	15,000 dpm α /100 cm ²	1,000 dpm α /100 cm ²
Th-232, Ra-226, Ra-228, Th-230, Th-230, Pa-231, Ac-227, Tl-206, Tl-208	100 dpm/100 cm ²	300 dpm/100 cm ²	20 dpm/100 cm ²
Th-232, Th-232, Sr-90, Ra-226, Ra-228, U-232 Tl-206, Tl-208, Tl-208	1000 dpm/100 cm ²	3000 dpm/100 cm ²	200 dpm/100 cm ²
Radioactive matters (nuclides) of decay series other than above, including spontaneous fission) except Sr-90 and other noted above.	5000 dpm $\beta\gamma$ /100 cm ²	15,000 dpm $\beta\gamma$ /100 cm ²	1000 dpm $\beta\gamma$ /100 cm ²

^a If surface contamination by both alpha- and beta-gamma-emitting nuclides exists, the limits established for alpha- beta-spontaneous-emitting nuclides should apply independently.

^b As used in this table, dpm (disintegrations per minute) means the rate of emission by radioactive materials as determined by correcting the counts per minute observed by an appropriate detector for background, efficiency, and geometric factors associated with the instrumentation.

^c Measurements of average contaminant should not be averaged over more than 1 sq. meter. For objects of less surface area, the average should be derived for each such object.

^d The maximum contamination level applies to an area of not more than 100 cm².

TABLE I (Continued)

The amount of removable radioactive material per 100 cm² of surface area should be determined by wiping that area with dry filter or soft absorbent paper, applying pressure, and assessing the amount of radioactive material on the paper with an appropriate instrument of known efficiency. When removable contamination on objects of less surface area is determined, the pertinent levels should be reduced proportionally and the entire surface should be wiped.

The average and maximum radiation levels associated with surface contamination resulting from beta-gamma emitters should not exceed 0.2 μ rad/hr at 1 cm and 1.0 μ rad/hr at 1 cm, respectively, measured through not more than 7 milligrams per square centimeter of total absorber.

APPENDIX D

PUBLIC INFORMATION GUIDANCE AND POLICY

1. Objective

The principal public information objective following a radiological incident is to make as many of the known facts, within the framework of security, available to the public, so that possible health hazards and precautions will be understood, undue public alarm will be avoided and scare stories written in the absence of facts will be at a minimum.

2. Policy

The following policies concerning release of information of reported incidents will be followed by the Regional staff:

- a. Licensees will be requested to make releases of information regarding the incident; its cause, effect, consequences, injuries involved, action being taken, etc.; whether they do or not, a release may be made by the Commission.
- b. Any news release by the Commission will be made by an NRC Public Affairs Officer or the Regional Director.
- c. Any information developed by the inspection staff on site concerning OIE activities will be discussed or coordinated with the Director prior to release through on site NRC Public Affairs Officers, when that information is not already self evident to the news media. Any amplification on self evident facts must be concurred in by the Director when the contact is other than a PAO.
- d. The Principal Inspector in charge of the OIT will respond to press inquiries. All OIT members will refer inquiries to the individual in charge, or to the RO: Public Affairs Office (PAO) if the PAO is at the scene.
- e. IS:O will be advised of the text of printed statements to be issued by the Region. The PAO may respond to inquiries without text, using information already known to the Director.

- f. Statements regarding OIT involvement will, when possible, be written to ensure accuracy and clarity and should be read to the assembled press corps or sufficient copies should be distributed.
- g. When there is doubt about any public information situation, guidance will be obtained from the Director. The PAO is also available for discussion of contacts with the news media.

3. Guidance

- a. Before issuing a statement it is necessary to determine authenticity of "facts" to be released. Licensee reports to NRC should be labeled as such. Questions concerning names and extent of injuries to personnel should be directed to the licensee.
- b. Questions concerning the closing off of roads or areas, evacuation of areas, restriction of access, seizing of foodstuffs or similar actions, should be referred to the authorities responsible for ordering such actions. However, if the NRC has made an official recommendation, that may be stated, after prior review by the Director.
- c. Technical findings have to be presented in layman's language and, as comparisons with established standards are frequently the most effective means for doing this, care should be taken to avoid inaccuracy. If, for instance, the maximum permissible concentration for plutonium is selected as the reference point, the spokesman should know rather than guess what that is.
- d. Avoid speculation! The spokesman should avoid commenting on hypothetical situations. Answering "what would have happened if . . ." questions tend to aid misunderstanding. Ask the news media to wait for your next factual announcement.
- e. Try not to be irked by constant requests for information from newsmen. They are trying to do their job just as you are trying to do yours. If you treat them as though they are unscrupulous, the reports of the situation and of what you said are less likely to leave much to be desired. If, in contrast, the press are a successful public information job will increase. If you are not to be the site, let the news men know you are to do the work by turning news facts over to the PAO.

- f. The principal inspector at the site of any "incident" should remember that the news media have frequent deadlines and that the PAO working on the incident needs to be regularly updated with any new information on the basic five questions: What happened? Who (no names) is involved? Where and when did it happen? Why did it happen? As a general rule, when the PAO is not along in the field but is back in the Region I Office, he should be updated during the noon hour and again around 4:30 to 5:30 p.m., because that hits the deadline cycles of news services and radio-TV operations. While this can be done through the branch chief or senior involved, the PAO prefers a direct call because it affords him the opportunity to ask clarifying questions in anticipation of news media questions. The PAO assumes responsibility for review by the Director of any information thus given him prior to its release to the news media.