WP 12-ER3903

Revision 6

Termination, Reentry, and Recovery

Management Control Procedure

EFFECTIVE DATE 10/12/10

Robert Paslay
APPROVED FOR USE

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CHANGE HISTORY SUMMARY		
Revision No.	**Date Issued**	**Description of Changes**
6	10/12/10	Editorial revision to remove reference to Attachment F of the HWFP.

INTRODUCTION

This procedure provides instructions for termination from an Operational Emergency, Reentry, and the formation of a Recovery Team, for development of a Recovery Plan, and for development of work instructions for recovery activities. The Facility Shift Manager (FSM) has the option to use this procedure to recover from other emergencies not deemed to be Operational Emergencies.

Performance of this procedure generates the following records:

- Reentry Plan
- Recovery Plan
- Work instructions
- Post Event Evaluation (Attachment 2)
- Logs, messages, and other documents from recovery activities

REFERENCES

BASELINE DOCUMENTS

- 10 CFR Part 835, "Occupational Radiation Protection"
- 10 CFR Part 850, "Beryllium Disease Prevention Plan"
- DOE Order 151.1C, Comprehensive Emergency Management System
- DOE Guide 151.1-4, Response Elements
- RCRA Contingency Plan, WIPP Hazardous Waste Facility Permit (Permit No. NM4890139088-TDSF, issued by the New Mexico Environment Department)
- *Manual of Protective Action Guides and Protective Actions for Nuclear Incidents*, EPA 400-R-92-001, U.S. Environmental Protection Agency, Washington, D.C., 1992
- WP 12-9, Waste Isolation Pilot Plant Emergency Management Program
- WP 12-HP3400, Contamination Control
- WP 15-MD3101, Start-Up and Restart of the WIPP Facility

PRECAUTIONS & LIMITATIONS

In the event that an emergency results from a change of condition, the FSM must exit this procedure and perform the requirements within the associated Emergency Response Procedure(s).

PREREQUISITE ACTIONS

If Contingency Plan has been implemented, verify all actions comply with Contingency Plan and appropriate regulations.

PERFORMANCE

1.0 TERMINATION OF AN EMERGENCY

1.1 FSM, appoint an individual as a Recovery Manager(s) (RM) for any Operational Emergency classified as an Alert or higher that involved actual release of radioactive/hazardous materials to the environment and/or any Operational Emergency that will require extensive follow-up activities.

1.2 FSM/RM, perform the following termination activities as required:

- Verify that accountability of personnel is complete.
- Determine the cause(s).
- Formally document the emergency response activities.
- Collect and retain data related to the emergency response effort (e.g., logs, faxes, messages, notes, etc.).
- Perform any necessary post-accident assessments and reporting.
- Verify that the facility/site and the U.S. Department of Energy (DOE) consults with appropriate offsite agencies, that there is not a valid reason to continue operating in the emergency response mode.
- Verify that radiation or hazardous material exposure levels within the affected facility or area(s) are stable or decreasing with time.
- Verify that the affected facility or site is in a stable condition, and there is a high probability that it can be maintained in that condition.
- Verify that fire, flood, earthquake, or similar emergency conditions no longer constitute a hazard to critical systems/equipment or to personnel.

- Verify that releases of radiological/hazardous material to the environment have ceased or are controlled within permissible regulatory limits.
- Verify that existing conditions no longer meet the established emergency categorization or classification criteria, and it appears unlikely that conditions will deteriorate.
- Verify that no surveillance relative to protective actions is needed, except for ingestion pathway concerns and contamination and/or environmental assessment activities.
- Verify that the immediate needs of all contaminated/injured personnel have been met.
- Verify that all initial emergency notifications have been completed.
- Verify that access to affected areas necessary for conducting recovery operations has been assessed.
- Verify that the incident scene is preserved until an investigative authority concurs with recovery operations.
- Verify that initial recovery activities have been clearly identified and prioritized.
- Coordinate the termination of the emergency with on-scene operations.
- Review the criteria for termination to determine if termination is appropriate.
- Ensure the required notifications were made at the termination of the emergency.
- Verify exit conditions from the specific emergency response procedure(s) are completed.
- Ensure the required notifications were made at the beginning of the emergency.

1.3 FSM, declare the Operational Emergency terminated.

2.0 REENTRY AND RECOVERY AT THE CONCLUSION OF THE OPERATIONAL EMERGENCY

2.1 FSM, appoint a Recovery Team Leader (RTL), as needed.

2.2 FSM, perform the following actions, as necessary to return an incident site and the surrounding environment to pre-emergency conditions.

- Restrict entry to event scene.
- In the event of a fatality(s), coordinate the reentry/recovery with New Mexico Office of Medical Investigator.
- Establish a recovery organization and determine the resources to begin recovery operations.
- Develop initial recovery tasks and assignments.
- Ensure proper notifications are made.
- Establish a recovery strategy.
- Determine on-site logistics support needs.
- Arrange for offsite logistic support needs.

NOTE

Attachment 1, Recovery Team Proposed Members and Responsibilities, lists suggested Recovery Team members and defines their responsibilities.

2.3 FSM/Designee, perform the following general actions for Impacted Areas/Facilities when **NO** recovery team is needed (e.g., a small incident involving localized areas of the site).

- Inspect containers, containment systems, and areas where they are located for signs of leakage or damage, leaking containers, and deterioration of containers and containment systems.
- Inspect affected equipment or areas associated with waste handling activities for proper operating mode in accordance with site procedures.
- Manually check automatic and alarmed features on units to ensure they are working.
- Inspect electrical boards AND overhead electrical lines for damage in the affected area/facility.
- Check affected buildings and fencing directly related to the impacted area for damage.

- Conduct general survey of site looking for signs of other impacted areas or other disturbances.

- Notify the FSM**,** if Designee appointed, of any necessary corrective measures needed, however temporary, to rectify potential or real problem(s).

- Ensure Attachment 2 is completed for each affected building, including approval.

NOTE

The RTL will have the responsibility and authority to:

- Coordinate recovery planning.

- Authorize recovery activities.

- Protect the health and safety of workers and the public.

- Initiate, change, or recommend protective actions.

2.4 RTL and RM, if applicable, select the appropriate personnel based on the extent and nature of the emergency for the recovery team in accordance with suggested positions listed in Attachment 1.

2.5 RTL/Recovery Team, develop a Recovery Plan that will accomplish the following objectives, as applicable:

- Develop a Reentry Plan that has: (1) detailed planning, (2) consideration of all safety precautions (see Attachment 3.C), and (3) the approval/coordination of the on-scene operations before allowing teams entry (i.e., pre-fire plans, Radiological Work Permits).

- Obtain technical support for reviewing the reentry and mitigation plans, as needed.

- Ensure the risks of injury to those individuals involved in mitigation activities are minimized.

- Weigh actual and potential risks to recovery (mitigation) individuals against the benefits gained (e.g., facility restoration and economic considerations).

- Exercise judgment and extreme caution in evaluating any proposed action that involves exposure.

- Ensure that the control of exposures are consistent with the immediate objective of saving human life, recovering deceased victims and/or the protection of health, property, and the environment.
- Weigh the probability of success of a mitigation mission.
- Define operational and environmental impact. Perform an assessment of the impacted area, if necessary.
- Establish reentry and personnel safety requirements for evacuated areas/facilities.
- Identify health protection requirements including industrial hygiene (e.g., beryllium contamination [10 CFR Part 850], carbon monoxide monitoring from a fire event [external or internal to a facility]) and/or radiation monitoring (10 CFR §835.202, and/or 10 CFR §835.204).
- Verify criteria established in 10 CFR §835.1302 for recovery (mitigation) operations is utilized as identified in Attachment 3, paragraph1.1.B.
- Identify contingency plan for rescue of reentry team.
- Define radioactive or hazardous material exposure limits and methods for control during reentry and recovery.
- Identify methods for reducing the spread of contamination.
- Determine criticality safety requirements (Nuclear Safety) if waste packages have been breached whose total fissile gram equivalent (FGE) exceeds 200 FGE.

2.6 RTL/RM, define specific tasks to be accomplished, as required, using the following criteria.

- Identify environmental monitoring and restoration requirements.
- Identify near/long-term Safeguard and Security requirements.
- Identify near/long-term logistics requirements.
- Identify near/long-term operational/maintenance requirements.
- Identify required interfaces with off-site authorities (e.g., DOE Headquarters, the New Mexico Environment Department, the U.S. Environmental Protection Agency).

- Identify impact to subcontractor equipment. The RTL or their designee coordinates interactions with contractors, vendors and offsite organizations.
- Coordinate with the Public Information Officer.
- Identify procedures, equipment, and supplies necessary to perform monitoring and decontamination when teams enter areas contaminated with hazardous materials.
- Identify plans and procedure for establishing a field decontamination station.
- Identify procedures to be used and develop written work instruction(s) for tasks not governed by existing procedures.
- Form a procedures review group to review all specialized procedures.
- Identify method for revising work instructions and procedures in the field.

NOTE

RTL or their designee approves special procedures and related training.

- Establish schedule for key milestones.
- Establish a tracking group to track all assigned tasks.

2.7 RTL, submit Recovery Plan to RM/FSM for review.

2.8 FSM/RM, identify and provide any additional personnel and material resources needed to complete recovery activities.

2.9 FSM/RM/RTL, verify the planning content has:

- Assessed the radiological or hazardous material surveillance data to determine the building or area affected.
- Reviewed the exposure histories of personnel required to participate in reentry operations.
- Determined the adequacy of monitoring, survey instruments and equipment.
- Developed or reviewed a survey plan for the reentry team.
- Developed a contingency plan for rescue of reentry team.

2.10 FSM, **AFTER** approving the Recovery Plan, direct the RTL to proceed with reentry of the recovery team.

2.11 RTL, perform a final briefing for the recovery team outlining the activities required in the recovery plan, including the following:

2.11.1 Ensure the Reentry Team uses the appropriate PPE and has specific criteria for aborting reentry activities.

2.11.2 Resolve all operational and safety concerns **PRIOR TO** dispatching the Reentry Team.

2.12 RTL, task the reentry team with the following criteria as required.

- Make use of all available information regarding building plans (i.e., pre-fire plans)
- Perform hazard and damage assessments.
- Conduct surveillance of the facilities involved.
- Assess conditions of building equipment and structures.

2.13 RTL, perform the following **AFTER** reentry has been completed, as applicable:

- Debrief entry team to collect information relating to the job performed, facility status, conditions encountered, and exposure received.
- Brief the FSM on facility conditions and evaluates whether the Recovery Plan needs to be revised and/or additional measures taken to return the facility to normal operating conditions.
- Ensure that all recovery operations are documented, and issue all final reports.
- Verify the Recovery Team completes Attachment 2 for each affected building or area and submits them to the FSM/RTL for review and approval.
- Conduct a final briefing of all recovery organization personnel to discuss resumption of normal operations and requirements for final reports on the recovery operation.
- Recovery Team, forward logs, messages, and other documents to RTL for processing and retention.

- RTL, provide all logs, messages, and other documents from recovery activities to Emergency Operations Center (EOC) Coordinator, if EOC activation.

2.14 If Implementation of the RCRA Contingency Plan, then the FSM verifies the following have been performed before hazardous or TRU mixed waste operations are resumed in that building or area:

- Decontamination procedures have been completed in accordance with WP 12-HP3400, RWP, and/or specific work instructions.
- All emergency equipment is cleaned and fit for intended use or replaced.
- Notification requirements have been met and all individuals/organizations in the initially notified have been contacted.

2.15 FSM, determine what actions are required to be completed by WP 15-MD3101.

2.16 FSM/RTL, use the following general criteria for resumption of normal operations. These requirements will vary dependent on the type of emergency and hazards involved; extent of damage to facility, equipment and environment; cause of the emergency; and actions required to prevent a re-occurrence.

- Structure integrity has been confirmed.
- Repairs to process/operation have been completed, and verified.
- Required training has been completed.
- Utilities have been restored.
- Federal, state and local organizations have been consulted prior to terminating recovery operations, as required.
- Contamination levels and radiation levels have been verified and are within allowed limits.
- If occupational dose limits have been exceeded as a result of the emergency, approval by the CBFO, WIPP Radiological Control Manager, and the FSM is required.
- If an investigation is required, approval of the investigative board is required.

- Compliance with Technical Specifications, Technical Safety Requirements, health and safety regulations, and environmental regulations.

2.17 FSM, exit this procedure if the event returns to an emergency, or Step 2.16 has been completed and the event has been terminated.

Attachment 1 - Recovery Team Proposed Members and Responsibilities

RECOVERY TEAM PROPOSED MEMBERS AND RESPONSIBILITIES	
PROPOSED MEMBER	RESPONSIBILITIES
Recovery Team Leader	Develop Work Instructions.
	Develop Recovery Plan.
	Implement Recovery Plan.
	Provide recovery documents to EOC Coordinator.
Emergency Preparedness Coordinator	Collect and organize documents generated in all emergency response facilities for evaluations, investigations, and record management.
	Collect and organize documentation pertaining to recovery operations and process for permanent storage.
Engineering Advisor	Review post emergency building and system integrity and structural soundness.
	Help develop and implement Recovery Plan using existing resources and procedures.
	Develop special procedures or work instructions.
	Forward logs, messages, and other documents to Recovery Team Leader for processing and retention.
Environmental Advisor	Review recovery operations for compliance with environmental regulations.
	Ensure proper environmental reporting and liaison with state and federal environmental authorities.
	Help develop and implement Recovery Plan using existing resources and procedures.
	Develop special procedures and training.
	Forward logs, messages, and other documents to Recovery Team Leader for processing and retention.
Nuclear Safety	Provide guidance for repackaging breached waste when the total FGE involved in the event exceeds 200 FGE.
	Provide guidance for the application of TSRs in the Recovery Plan.

Attachment 1 - Recovery Team Proposed Members and Responsibilities

RECOVERY TEAM PROPOSED MEMBERS AND RESPONSIBILITIES	
PROPOSED MEMBER	RESPONSIBILITIES
Operations and Maintenance Advisor	Review post emergency repairs and modifications to ensure operational effectiveness and safety.
	Help develop and implement Recovery Plan using existing resources and procedures.
	Develop special procedures or work instructions.
	Forward logs, messages, and other documents to Recovery Team Leader for processing and retention.
Public Affairs Advisor	Prepare, obtain approvals (Recovery Team Leader, Crisis Manager, DOE Site Representative), and disseminate information to media and employees concerning recovery operations.
	Help develop and implement Recovery Plan using existing resources and procedures.
	Develop special procedures or work instructions.
	Forward logs, messages, and other documents to Recovery Team Leader for processing and retention.
Safety/Industrial Hygienist/Radiological Advisor	Review planned recovery activities involving actual or potential personnel exposure to radioactive or hazardous materials.
	Help develop and implement Recovery Plan using existing resources and procedures.
	Develop special procedures and training.
	Forward logs, messages, and other documents to Recovery Team Leader for processing and retention.
Security Advisor	Manage site security activities in support of recovery efforts.
	Help develop and implement the Recovery Plan using existing resources and procedures.
	Develop special procedures and training.
	Forward logs, messages, and other documents to Recovery Team Leader for processing and retention.

Attachment 2 - Post-Event Evaluation

POST EVENT EVALUATION
Building No. _____ OR Area Identification: _____ Date: _____
INSTRUCTIONS: 1. Place "YES," "NO," or "CHECK MARK" in each blank, whichever is appropriate. Write "N/A" in all non-applicable blanks. 2. Where damage is indicated, provide written explanation on separate page, then attach it to this form.

1.0 EVALUATION OF INTERIOR STRUCTURES

Structure	No Damage	Possible Damage	Moderate Damage	Severe Damage	Not Occupiable
Outside walls					
Windows					
Plaster					
Drywall					
Light fixtures					
Lavatories					
Radioactive, biological (medical), or toxic material containment systems					

2.0 VISUAL OBSERVATION OF BUILDING STRUCTURE

Structure	No Damage	Possible Damage	Moderate Damage	Severe Damage	Not Occupiable
Masonry					
Steel					
Wood					
Concrete					

3.0 EVIDENCE OF SERVICE INTERRUPTION

Service	Yes	No	Status
Electricity			
Water			
Telephone			

Attachment 2 - Post-Event Evaluation

Building No. _____ OR Area Identification: _____ Date: _____

4.0 SYSTEM STATUS

System	No Damage	Possible Damage	Moderate Damage	Severe Damage
Waste Handling Equipment				
Hazardous Material Storage Areas				
Compressed Air Systems				
Domestic Sewer Line				
Sanitary Water Line				
Fire Sprinklers				
Electrical System				
Surface Heating, Ventilating & Air Cond.				
Mechanical Apparatus Integrity				
Physical Connections				
Sirens and Alarms				
Radiation Monitoring Systems				
Public Address System				
U/G Ventilation & Filtration System				
Hoists				
Diesel Generators				
Other				

5.0 INTERNAL CONDITION

Item	Unmoved	Moved	Overturned	Broken	Fallen	Unknown
Furniture						
Equipment						
Miscellaneous Objects						

Attachment 2 - Post-Event Evaluation

Building No. _____ OR Area Identification: _____ Date: _____

6.0 OCCUPANCY ASSESSMENT

Assessment	YES/NO
Can be Occupied with Little or No Recovery Effort	
Can be Occupied with Moderate Recovery Effort	
Some Areas Can be Occupied, Others Not	
Can be Occupied after Major Recovery Effort	
Not Can be Occupied	
Unable to Judge	

Paragraph statement that supports item 6.0 finding:

7.0 EXTERNAL CONDITIONS

Area	No Damage	Possible Damage	Moderate Damage	Severe Damage
Roads				
Walkways				
Satellite Accumulation Areas				
WHB Storage Area				
Yard Staging Area				

Attachment 2 - Post-Event Evaluation

Underground Area Identification: _____ Date: _____				
8.0 UNDERGROUND ASSESSMENT				
ITEM	SAFE	UNSAFE	COMMENTS	
Salt Hoist/shaft				
Waste Hoist/shaft				
AIS Hoist/shaft				
Exhaust shaft				
Back				
Ribs				
Floor				
Roof bolts				
Bulkhead structures				
Block walls (seals)				
SERVICES	NO DAMAGE	NEEDS REPAIRS	COMMENTS	
Electrical				
Fire alarms				
Mine pager phone(s)				
Lighting				
Electrical panels				
Ventilation				
Compressed air lines				
WASTE CONTAINERS	NO DAMAGE	VISIBLE DAMAGE	KNOWN CONTAMINATION	COMMENTS
Satellite Accumulation Areas				
U/G Panel Disposal Area				

Attachment 2 - Post-Event Evaluation

RECOVERY TEAM MEMBERS		
Position	**Organization**	**Name**
RTL		
Emergency Preparedness Coordinator		
Engineering Advisor		
Environmental Advisor		
Operations and Maintenance Advisor		
Public Affairs Advisor		
Safety		
Radiological Advisor		
Security Advisor		
Nuclear Safety		

Attachment 3 - Reentry Considerations

1.0 Operational Emergency Events and Conditions

Operational Emergencies are major unplanned or abnormal events or conditions that involve or affect DOE/NNSA facilities and activities by causing or having a potential to cause serious health and safety or environmental impacts; required resources from ou5tside the immediate affected area or local event scene to supplement the initial response; and require time-urgent notifications to initiate response activities at locations beyond the event scene. Such emergencies represent, cause, or have the potential to cause the events or conditions described below.

Incidents that can be controlled by employees or maintenance personnel in the immediate/affected facility or area are not Operational Emergencies. Incidents that do not pose a significant hazard to safety, health, and/or the environment and that do not require a time-urgent response are not Operational Emergencies.

2.0 Reentry for "Rescue and Recovery"

Title 10 *Code of Federal Register* Part 835, Subpart 1302, contains requirements to be met when conducting re-entry operations in response to a radiological hazard. The regulation provides dose guidelines for the control of exposure during emergency activity. Although the regulation is designed for response to radioactive releases, the basic principles apply to any type of hazardous material response. The regulation begins with three basic principles: "(1) the risk of injury to those individuals involved in rescue operations shall be minimized, (2) operating management shall weigh actual and potential risks to rescue and recovery individuals against the benefits to be gained, and 3) no individual shall be required to perform rescue action that might involve substantial personal risk."

a. ***General Considerations.*** The risk of injury to persons involved in rescue and recovery activities should be minimized, to the extent practical. Control of exposures should be consistent with the immediate objectives of saving human live; recovering deceased victims; and/or protection of health, property, and the environment.

- Personnel managing response activities should exercise judgment to evaluate any proposed action involving exposure. Evaluation should consider risk versus benefit (e.g., weighing the risks of health impacts, actual or potential, against the benefits [social, economic]).

- Before dispatching any reentry teams, the Incident Commander should ensure that the activities have been coordinated with the head of the organization providing the reentry team members (e.g., if the fire department is providing the reentry personnel, the Incident Commander will coordinate with the responsible fire department officer on the scene). This discussion should ensure that all operational and safety concerns are resolved prior to team dispatch.

- For controlling exposures to radiological hazards, the EPA has prepared guidance and criteria which is presented in *Manual of Protective Action Guides and Protective Actions for Nuclear Incidents.* EPA limits for workers performing emergency services apply only to doses incurred during an emergency. Per 10 CFR §835.202(a), exposures received in emergency exposure situations are not included in meeting the occupational exposure limits to general employees resulting from NNSA/DOE activities. The EPA manual also provides tables with general information that may be useful in advising workers of risks of acute and delayed health affects associated with large doses of radiation.

b. ***Emergency Reentry Situations.*** The following are dose criteria and judgment factors for three types of emergency action; saving of human life; recovery of deceased victims; and protection of health and property. 10 CFR § 835.1302 contains requirements for emergency exposure activities.

- Saving of Human Life or Protection of Large Populations. If the victim is considered to be alive, the course of action should be determined by the individual in charge of the on-scene response activity. The potential amount of exposure to rescue personnel should be evaluated, and an exposure objective should be established for the rescue mission. The evaluation of the inherent risks should consider:

  - The reliability of the prediction of injury from measured/estimated exposure rates. In this context, consideration should be given to the uncertainties associated with the specific instruments and techniques used to estimate the exposure rate. This is especially crucial for exposure to radiation when the estimated dose approximates 100 rad (1 gray) or more.

  - The effects of acute external and/or internal exposure.

- The capability to reduce risk through physical mechanisms such as the use of protective equipment, remote manipulation equipment, or similar means.

- The progress of mitigative efforts that would decrease or increase risk.

- The probability of success of the rescue action.

- Recovery of Deceased Victims. The recovery of deceased victims should be well planned. Except as provided below, the amount of exposure received by persons in recovery operations should be controlled within existing occupational exposure limits.

  - When fatalities are located in inaccessible areas due to high risk, and when the recovery mission would result in exposure in excess of occupational exposure limits, special remote recovery devices should be considered for use in retrieving bodies. When it is not feasible to recover bodies without personnel entering the area the official in charge may approve personnel to exceed occupational exposure limits. This approval, for an individual, should not exceed 10 rem (0.1 sievert) in any year.

- Protection of Health and Property. When the risk (probability and magnitude) of the hazard either bears significantly on the state of health of people or may result in loss of property so that immediate remedial action is needed, the following criteria should be considered:

  - When it is deemed essential to reduce a potential hazard to protect health or prevent a substantial loss of property, a planned exposure objective for volunteers should be established not exceed 10 rem (01 sievert) for an individual in a year. Under special circumstances, an exposure not to exceed 25 rem in any one year may be set.

  - When the risk of exposure following the incident is such that life might be in jeopardy, or there might be severe effects on health or the public or loss of property inimical to the public safety, the criteria for saving of human life should apply (EPA 400 R-92-001).

Attachment 3 - Reentry Considerations

3.0 Reentry for Other than "Rescue and Recovery"

Non-emergency reentry is a planned activity that is conducted to determine or verify the status of building conditions. Normally nonemergency reentry into buildings is made when the emergency situation is under control and more deliberate planning can be made for the necessary activities that need to be performed.

a. ***General Considerations.*** Before the initial reentry, the following considerations shall be included in the planning:

- Assessment of hazardous material surveillance data to determine buildings potentially affected.
- Review of exposure histories of personnel required to participate in reentry operations.
- Determination of equipment of adequacy for monitoring and survey instrumentation.
- Review and revision of security access lists to prevent unauthorized or unintentional entry into hazardous areas.
- Review of survey team plans to include:
  - Anticipated contamination levels.
  - Survey equipment required.
  - Shielding requirements and availability.
  - Protective clothing and equipment required.
  - Access control procedures including exposure control limits and personnel dosimetry requirements.
  - Decontamination requirements.
  - Communications requirements.

b. **Reentry Team Tasking.** Reentry teams shall be tasked with as many of the following tasks as required:

- Determine the initial required recovery operations including personnel rescue.
- Perform hazard, or damage assessment.

- Conduct surveillance of facilities.
- Isolate and post areas.
- Assess conditions of building equipment and structures.
- Re-establish building security.
- Restore or operate equipment (as qualified) to provide vital services for the building.
- Perform materials control and accountability functions (as qualified).

c. **Safety Precautions.** Reentry will include the use of appropriate protective clothing and respiratory protection and shall include specific criteria for aborting reentry.

Detailed planning, consideration of all safety precautions, and approval of the FSM is required BEFORE entering the following:

- Toxic or radioactive atmospheres.
- Oxygen-deficient atmospheres.
- Areas with downed power lines.
- Areas with fire, explosion, or structural collapse.
- Areas with special nuclear materials.
- Security comprised areas.

Emergency reentry is governed by exposure control considerations and may be limited to existing occupational exposure limits as determined by the appropriate safety personnel. Entry into hazardous atmospheres will require adequate protective and monitoring equipment. Exposures for response personnel should not exceed 25 rem unless for life saving attempts. **All planned exposures above normal occupational limits are voluntary and require the permission of the Incident Commander** (if the Emergency Operations Center is activated). Occupational Medicine personnel who may apply appropriate restrictions and remedial actions will review employees receiving exposures in excess of occupational limits.

Attachment 3 - Reentry Considerations

4.0 Off-Site Reentry

In emergencies involving off-site populace, reentry is the responsibility of local and state authorities with input and guidance provided by the facility. This assistance typically consists of environmental monitoring and assessment of action necessary to support restoration.