

Monday, February 26, 2001

Document Update Notification

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DOCUMENT NO: OP-1903.004

TITLE: ADMIN. & MAINTENANCE OF THE
EMERGENCY PLAN & IMPLEMENTING
PROCEDURES

REVISION NO: 022-02-0

CHANGE NO: PC-02

SUBJECT: PERMANENT CHANGE (PC)

☒ ← If this box is checked, please sign, date, and return.



☐ ANO-1 Docket 50-313

☐ ANO-2 Docket 50-368

Signature

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ENTERGY OPERATIONS INCORPORATED ARKANSAS NUCLEAR ONE

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TITLE: ADMIN. & MAINTENANCE OF THE
EMERGENCY PLAN & IMPLEMENTING
PROCEDURES

PROC/WORK PLAN NO.
1903.004

CHANGE NO.
022-02-0

WORK PLAN EXP. DATE
N/A

TC EXP. DATE
N/A

SAFETY-RELATED
☒ YES ☐ NO

IPTE
☐ YES ☒ NO

TEMP ALT
☐ YES ☒ NO

SET # 103

When you see these TRAPS

Time Pressure
Distraction/Interruption
Multiple Tasks
Over Confidence
Vague or Interpretive Guidance
First Shift/Last Shift
Peer Pressure
Change/Off Normal
Physical Environment
Mental Stress (Home or Work)

Get these TOOLS

Effective Communication
Questioning Attitude
Placekeeping
Self Check
Peer Check
Knowledge
Procedures
Job Briefing
Coaching
Turnover

VERIFIED BY

DATE

TIME

FORM TITLE:

VERIFICATION COVER SHEET

FORM NO.
1000.006A

CHANGE NO.
048-00-0

**ENTERGY OPERATIONS INCORPORATED
ARKANSAS NUCLEAR ONE**

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TITLE: Admin. & Maintenance of the Emergency Plan & Implementing Procedures		PROC/WORK PLAN NO. 1903.004	CHANGE NO. 022-02-0
<input checked="" type="checkbox"/> PROCEDURE <input type="checkbox"/> WORK PLAN, EXP. DATE <u>N/A</u>		PAGE <u>1</u> OF <u>1</u>	
TYPE OF CHANGE: <div style="display: flex; justify-content: space-between;"><div><input type="checkbox"/> NEW Procedure or Work Plan</div><div><input type="checkbox"/> REVISION</div><div><input checked="" type="checkbox"/> PC <input type="checkbox"/> EZ</div><div><input type="checkbox"/> TC EXP. DATE: <u>N/A</u></div><div><input type="checkbox"/> DELETION</div></div>			
AFFECTED SECTION: (Include step # if applicable)	DESCRIPTION OF CHANGE: (For each change made, include sufficient detail to describe reason for the change.)		
Table of Contents, Page 2, Step 14.2.6	Added Form 1903.004G "EAL State and Local Agreement"		
Page 18, Section 14.0	Added Form 1903.004G "EAL State and Local Agreement"		
Page 9, Section 6.3	Added Step 6.3.4 "The Emergency Planner(s) shall obtain State and Local Government Authorities agreement prior to approval of changes to 1903.010, "Emergency Action Levels". Use Form 1903.004G		
Page 29	Added Form 1903.004G		
FORM TITLE: DESCRIPTION OF CHANGE		FORM NO. 1000.006C	CHANGE NO. 048-00-0

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1.0 PURPOSE

The purpose of this procedure is to describe the methods for administration and maintenance of the Emergency Plan and associated procedures.

2.0 SCOPE

- 2.1 This procedure describes the responsibilities of the ANO Emergency Planning Staff in regard to the administration and maintenance of the Emergency Plan and Implementing Procedures.
- 2.2 This procedure provides guidelines for management of the Emergency Plan and the Emergency Plan Implementing Procedures.
- 2.3 This procedure provides guidelines for maintenance of emergency facilities and equipment.
- 2.4 This procedure provides guidelines for the performance and documentation of the Quarterly Emergency Telephone Directory review.
- 2.5 This procedure outlines audit requirements of the Emergency Planning Program as outlined in 10CFR50.54(t).
- 2.6 This procedure provides guidelines for drills and exercises.

3.0 REFERENCES

3.1 REFERENCES USED IN PROCEDURE PREPARATION

- 3.1.1 Emergency Plan
- 3.1.2 NUREG-0654, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants"
- 3.1.3 1000.006, "Procedure Review, Approval, and Revision Control"
- 3.1.4 10CFR50.54(q)
- 3.1.5 10CFR50.54(t)
- 3.1.6 Memorandum ANO-81-9510 (as amended by the SRC November 16, 1981)
- 3.1.7 NUREG 0660, "NRC Action Plan Developed as a Result of the TMI-2 Accident"
- 3.1.8 Title 10 Code of Federal Regulations Part 50 (Appendix E IV.B)

3.2 REFERENCES USED IN CONJUNCTION WITH THIS PROCEDURE:

- 3.2.1 1000.150, "Licensing Document Maintenance"
- 3.2.2 1000.131, "10CFR50.59 Review Program"
- 3.2.3 1903.010, "Emergency Action Level Classification"

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3.3 RELATED AND PROCEDURES INCLUDE:

- 3.3.1 1903 Series Procedures, "Emergency Plan Implementing Procedures"
- 3.3.2 1904 Series Procedures, "Offsite Dose Projections"
- 3.3.3 1905 Series Procedures, "Emergency Radiation Protection Procedures"

3.4 REGULATORY CORRESPONDENCE CONTAINING NRC COMMITMENTS WHICH ARE IMPLEMENTED IN THIS PROCEDURE INCLUDE: **[BOLD]** DENOTES COMMITMENTS

- 3.4.1 0CNA018203 (P-9495) Section 7.1.1A
- 3.4.2 0CAN068320 (P-10767) Section 6.1.1H
- 3.4.3 0CAN048205 (P-10843) Section 11.0
- 3.4.4 0CAN128211 (P-10861) Section 5.5, Form 1903.004A
- 3.4.5 0CAN128211 (P-10863) Section 9.1.4
- 3.4.6 10CFR50. APP E.V. (P-14145), Attachment 1
- 3.4.7 0CAN058203 (P-10833) A method for assuring that an annual review of the EAL's is performed with the State of Arkansas will be established. Section 13.2.2 A
- 3.4.8 0CAN128211 (P-10860) Emergency Planning Coordinators shall attend, as available, at least one training session concerning emergency preparedness annually. Section 13.1.1
- 3.4.9 0CAN068320 (P-10769) Plan does not indicate if on-the-spot (coaching) correction of erroneous performance will be made by the drill instructor (controllers). Section 7.2.1.B
- 3.4.10 0CAN068320 (P-10770) Health Physics drills do not include the analysis of in-plant liquid samples with actual elevated radiation levels on an annual basis. Sections 7.2.3(C, D, E)
- 3.4.11 0CAN068320 (P-10771) Radiation Monitoring Drills do not include provisions for communications (reporting of results to proper ERO position) and record keeping. Section 7.2.3.C
- 3.4.12 0CAN068320 (P-10772) Conduct Exercises in accordance with NRC and FEMA rules. Section 7.2.2
- 3.4.13 0CAN128305 (P-4109) Demonstrating communications and record keeping capabilities. Section 7.2.3.C
- 3.4.14 0CAN128305 (P-4175) Annual training of Off-Site Personnel. Sections 13.2
- 3.4.15 0CAN098106 (P-4822) Practical training sessions for monitoring team members. Section 7.2.3

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- 3.4.16 0CAN058203 (P-10872) Training for individuals who are assigned responsibility for emergency preparedness is necessary for effective emergency planning. Section 13.1
- 3.4.17 0CAN079009 (P-1465) Conduct ERF Drills at least four times per year (in addition to the biennial exercise). The Arkansas Department of Health has requested that they be allowed to participate in each of the ERF drills. Section 7.2.3.G

4.0 DEFINITIONS

- 4.1 Annual - For the purposes of this procedure, annual is defined as that period between January 1st and December 31st of each year.
- 4.2 Drill - An activity aimed at developing, maintaining and testing skills in a particular portion of the Emergency Response Organization where on the spot corrections are made.
- 4.3 EAL Bases Document - The document which provides the technical bases for initiating conditions used to classify plant related emergencies.
- 4.4 Emergency Response Organization (ERO) - The organization which is composed of the IRS, the EOF staff, the TSC staff, the OSC staff, and the Emergency Team members. It has the capability to provide manpower and other resources necessary for immediate and long-term response to an emergency situation.
- 4.5 Exercise - An activity aimed at testing the integrated capability and a major portion of the basic elements of the Emergency Planning and Response Organizations. An exercise involves a major portion of the Emergency Response Organization and is evaluated by the NRC.
- 4.6 Initial Response Staff (IRS) - The emergency organization primarily composed of plant personnel which must be able to augment the onsite plant personnel in accordance with Table B-1 of the ANO Emergency Plan.
- 4.7 Letter Of Assignment - A memorandum of notification from the General Manager, Plant Operations to an individual which documents the assignment of the individual to an ERO position.
- 4.8 Letter Of Reinstatement - A memorandum of notification from the General Manager, Plant Operations to a suspended ERO individual which documents the reinstatement of the individual to their previous ERO position upon completion of the procedural training requirements.
- 4.9 Letter Of Selection - A memorandum of notification from the Manager, Emergency Planning to an individual which documents their selection for a proposed assignment to an ERO position. This letter also informs the individual that Emergency Planning will contact them to arrange the appropriate training.

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- 4.10 Letter Of Suspension - A memorandum of notification from the General Manager, Plant Operations to an ERO individual which documents the suspension of an assigned individual who failed to meet the procedural training requirements.
- 4.11 Letter Of Termination - A memorandum of notification from the General Manager, Plant Operations to an ERO individual which documents the permanent termination of the individual from their ERO assignment.
- 4.12 Position Workbook - A workbook prepared for a specific ERO position. These workbooks may be used in place of classroom instruction in requalification training.
- 4.13 Table Top Drill - A training activity designed to develop and maintain an individual's knowledge of their assigned ERO duties. The Table Top Drill will include discussion of ERO member's response to simulated emergencies.
- 4.14 Training Session - An activity designed to develop or maintain skills. (This may include classroom training, computer-based training, practical drills or any other type of session, excluding the biennial Emergency Preparedness Exercise, that meets this criteria. Any of these activities may be conducted in one or more segments.)
- 4.15 Walk-Through - A training activity designed to develop and maintain an individual's knowledge of their assigned ERO duties. The walkthrough is normally conducted in the emergency response facility, and includes discussion or demonstration of the appropriate facility activation, staffing, and organizational responsibilities for the individual's assigned ERO position.

5.0 RESPONSIBILITY AND AUTHORITY

5.1 DIRECTOR, NUCLEAR SAFETY ASSURANCE

The Director, Nuclear Safety Assurance is responsible for the overall implementation of the requirements set forth in this procedure.

5.2 MANAGER, EMERGENCY PLANNING

The Manager, Emergency Planning shall be responsible for:

- The maintenance of ANO Emergency Preparedness.
- Responsible for implementing the requirements set forth in this procedure.
- 10CFR50.54(q) and NUREG-0654 reviews of changes to the Emergency Plan
- Evaluation of drill/exercise results
- Identifying the training requirements for personnel assigned to the Emergency Response Organization.

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5.3 EMERGENCY PLANNER

The Emergency Planner shall perform:

- Those tasks assigned by this procedure
- Shall coordinate activities to assure consistency between the Emergency Plan and Implementing Procedures.
- Assure that the administrative program elements are addressed
- Schedule initial training and re-qualification training
- Collect and forward to the ANO records management system appropriate training documentation and for providing training to personnel in the Emergency Response Organization.
- The Emergency Planner(s) shall coordinate and issue changes to the Emergency Plan and the Emergency Plan Implementing Procedures.

5.4 Revisions to the Emergency Plan and Implementing Procedures shall be approved in accordance with Sections 6.2 and 6.3 of this procedure.

(P-10861)

5.5 [Suggestions for improvement of the Emergency Plan and Implementing Procedures may be made at any time by the plant staff using Form 1903.004A.]

6.0 INSTRUCTIONS

6.1 REVIEW AND UPDATING OF THE EMERGENCY PLAN AND IMPLEMENTING PROCEDURES

6.1.1 The review and updating of the Emergency Plan and Implementing Procedures shall include the following actions by the Emergency Planning Supervisor or his designee:

- A. Provide for continuing review of the Emergency Plan and Implementing Procedures concerning ANO response.
- B. Notify affected site departments of Plan and Procedure changes.
- C. Notify affected site based ERO members of Plan and Procedures changes, as necessary.
- D. Process requests for improvements submitted on Form 1903.004A.
- E. Annually, review the Plan and Procedures in their entirety to verify that changes that have occurred which impact the Plan and/or procedures have been incorporated.
- F. At the conclusion of drills and/or exercises involving site ERO members, or at the conclusion of an incident which required implementation of the Plan, provide for a critique and evaluation by participants and revise the Plan and Procedures where appropriate.

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(Step 6.1.1 cont.)

- G. Evaluate feedback from Emergency Plan Training (including feedback from class critiques) and incorporate changes and improvements into the Emergency Plan and Procedures as necessary.

(P-10767)

- [H. Quarterly, ensure that the Emergency Telephone Directory is complete and current for emergency response personnel and that related sections of Procedures 1903.010 correspond to the Emergency Telephone Directory. Document the review on Form 1903.004C.]
- I. Coordinate approval of the Emergency Plan changes in accordance with Section 6.2 of this procedure.
- J. Coordinate approval of the Emergency Plan Implementing Procedure changes in accordance with Section 6.3 of this procedure.
- K. Respond to QA/INPO audits and NRC inspections of emergency planning activities.
- L. Ensure that the Emergency Response Duty Roster and guidelines are updated and distributed annually.

6.2 APPROVAL OF EMERGENCY PLAN REVISIONS (AS SHOWN IN ATTACHMENT 1) SHALL BE PROVIDED AS FOLLOWS:

- 6.2.1 Revisions to the Emergency Plan shall be coordinated by the Emergency Planner(s).
- 6.2.2 The Emergency Planner(s) shall perform an independent review of the Emergency Plan revision.
- 6.2.3 The Emergency Planner(s) shall perform a 50.54(q) review for all Emergency Plan revisions (form 1903.004F).
- 6.2.4 The Emergency Plan revision approval process will be conducted in accordance with Licensing Document Maintenance Procedure.
- 6.2.5 The approved plan revision shall be distributed in accordance with established document control procedures.
- 6.2.6 A record of each change to the Emergency Plan made without prior approval by the NRC, shall be retained for three years from the date of the change.
- 6.2.7 The Emergency Plan and records of any changes to the Emergency Plan that decrease the effectiveness of the Plan, shall be retained until the NRC terminates the license for both ANO units.

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6.2.8 The Emergency Planning Program, as described and implemented by the ANO Emergency Plan and Implementing Procedures shall be audited once per 12 months by persons who have no direct responsibility for implementation of the Emergency Planning Program.

6.3 APPROVAL OF EMERGENCY PLAN IMPLEMENTING PROCEDURE REVISIONS SHALL BE PROVIDED AS FOLLOWS:

6.3.1 Revisions to the Emergency Plan Implementing Procedures shall be coordinated by the Emergency Planner(s).

6.3.2 The Emergency Planner(s) may perform an independent review of the Emergency Plan Implementing Procedure revision.

NOTE

Revisions to Procedure 1903.010, "Emergency Action Level Classification", shall be independently reviewed by the Unit One and/or Unit Two Operations Manager.

6.3.3 The Emergency Planner(s) shall perform a 50.54(q) review for any changes to the Emergency Action Levels (EALs) contained in Procedure 1903.010, "Emergency Action Level Classification".

6.3.4 The Emergency Planner (s) shall obtain State and local government authorities agreement prior to approval of changes to 1903.010, "Emergency Action Levels". Use form 1903.004 G.

6.3.5 The Emergency Plan Implementing Procedures revision approval process will follow the requirements of Procedure 1000.006, "Procedure Control".

6.3.6 The approved procedure revision shall be distributed in accordance with established document control procedures.

6.4 REVIEW AND REVISION OF THE EAL BASES DOCUMENT

6.4.1 The review and revision of the EAL Bases Document will be coordinated by Emergency Planning.

6.4.2 The following directors/managers shall ensure that proposed changes to the document are reviewed for technical accuracy and/or applicability as emergency classification criteria.

- A. Operations Managers
- B. Director, Design Engineering
- C. Manager, Rad Protection and Chemistry
- D. Director, Nuclear Safety Assurance

6.4.3 Reviews will be documented on Form 1903.004D. Procedure revisions resulting from changes to the EAL Bases Document will be reviewed and approved as described in Section 6.3.

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6.5 REVIEW OF TRANSMITTALS TO NRC

- 6.5.1 All correspondence to the Nuclear Regulatory Commission that originates in the Emergency Planning Section shall be submitted to Licensing for review prior to transmittal to the Nuclear Regulatory Commission.

7.0 DRILLS AND EXERCISES

- 7.1 The Emergency Planner(s) shall coordinate to develop scenarios for emergency preparedness drills and the biennial emergency preparedness exercise in accordance with the Emergency Plan.

7.1.1 The Emergency Planner(s) shall:

(P-9495)

- [A. Submit a listing of objectives associated with the biennial emergency preparedness exercise to the NRC for review, at least 90 days prior to the scheduled exercise date, in accordance with NRC Inspection Procedure 82302, Exhibit 1.]
- B. Submit the biennial emergency preparedness exercise scenario and associated materials to the NRC for review, at least 60 days prior to the scheduled exercise date, in accordance with NRC Inspection Procedure 82302, Exhibit 1.
- C. Publish a schedule of emergency preparedness drills for the upcoming year during the last quarter of the current year.
- D. Schedule a critique at the conclusion of each exercise to evaluate the ability of the members of the ERO to respond as required by the Emergency Plan and Implementing Procedures.
- E. Submit documentation of each emergency preparedness practice drill/exercise to ANO Records Management System. This documentation as a minimum shall include the following:
 - 1. Scenario
 - 2. Drill/Exercise Evaluation Summary Sheets
 - 3. Documentation addressing action taken on each finding from the drill/exercise.
- F. Provide the Vice President, Operations - ANO with a report of findings and recommended corrective actions, resulting from the exercise critiques.

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7.2 CONDUCTING DRILLS AND EXERCISES

7.2.1 Drills and exercises should be conducted in the following manner:

- A. A scenario shall be prepared prior to the drill or exercise. The scenario should be as realistic as possible and should include the following items:
 1. Objective(s)
 2. Participating organizations
 3. Chronology of events
 4. A time schedule of real and simulated initiating events
 5. A narrative summary describing the simulated events and the appropriate responses and actions
 6. Arrangements for drill controllers and evaluators
- B. Evaluators shall be assigned to view and critique the drill or exercise. **[The evaluators shall make on-the-spot corrections of any erroneous performance identified (drills only).]** Their critique shall be conducted as soon as practical after the drill or exercise.
- C. A review/evaluation should result from the exercise and drill critique. The review should include an evaluation of any weaknesses identified and recommended corrective actions.
- D. Appropriate action shall be taken to make improvements, as necessary.
- E. Table Top Drills may include any or all of the components recommended in items A-D above. Table Top Drills typically include a scenario-based situation to which ERO personnel can respond, and which provides opportunities for them to interact with other personnel in their Emergency Response Facility. In addition, improper responses can be corrected at the time they are made, and may be evaluated to determine if they are programmatic in nature.

(P-10769)

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(P-10772) [7.2.2 Exercises

At least biennially, local and state agencies shall be invited to participate in an exercise with the ANO staff. The scenarios for exercises shall be varied such that the major elements of the Emergency Plan and emergency response organizations are tested within a six (6) year period. The exercise will attempt to include mobilization of state and local personnel and resources adequate to verify the capability to respond to the accident scenario, as required. Provisions shall be made to start an exercise between 6 p.m. and 4 a.m. once every six (6) years.]

(P-10872) [7.2.3 Drills

The following types of drills shall be conducted (in addition to the biennial exercise) at the indicated frequency:

- A. Fire Emergency (Fire Brigade) - Fire Brigade Drills are conducted in accordance with 1063.020, "Fire Brigade Training Program".
- B. Medical Emergency (ANNUALLY) - This drill requires activation of the Emergency Medical Team and, if feasible, transportation by the Pope County Emergency Medical Service of a simulated injured individual to the offsite medical treatment facility and activation of the offsite medical treatment facility. The offsite portions of the medical drill may be performed as part of an exercise.
- C. Radiological Monitoring Drills - Reference NUREG-0654 II.N.d - These drills may be done independently or they may be included in any of the regularly scheduled ERO Drills.
 1. Environmental Monitoring Drills (ANNUALLY) - These drills include collecting environmental samples, actual analysis of the samples and documentation of analysis results for water, soil, vegetation and air samples.
 2. In-plant Monitoring Drills (ANNUALLY) - These drills include detection and measurement of simulated inplant radiological conditions. These measurements of simulated elevated radioactive releases are reported to the appropriate person, the results are evaluated and appropriate protective/corrective actions are recommended.]

(P-10770,P-10771
(P-4019)

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(Step 7.2.3 cont.)
(P-10770)

[D. Health Physics Drills - Reference NUREG-0654 II.N.e - These drills may be done independently or they may be included in any of the regularly scheduled ERO Drills.

1. Field Monitoring Drills (SEMI-ANNUAL) - These drills include assessment of simulated elevated radiological releases to the environment and response to radiological conditions. Direct radiation readings and air samples of a simulated radioactive releases offsite are taken, results are reported to the appropriate ERO position, the results are evaluated and appropriate protective/corrective actions are recommended.
2. Post Accident Sampling Drills (ANNUALLY) - These drills include sampling and analysis of inplant liquid with actual elevated radiation levels. RCS samples may be used as the actual elevated sample. The samples are taken, results are reported to the appropriate ERO position, the results are evaluated and appropriate actions are recommended.]

(P-10770)

[E. Radiological Dose Assessment Drill (ANNUALLY) - A radiological dose assessment drill utilizing simulated field monitoring data shall be conducted annually. The drill may be in conjunction with a health physics drill and will address dose projection calculations and offsite Protective Action Recommendations.

1. Dose Assessment activities will be included in the full-scale Emergency Response Organization Drills for the purpose of providing Dose Assessment Team members and Dose Assessment Supervisors with practical applications of Dose Assessment skills. These activities will be in addition to the scheduled exercises.]

F. Communication - Communication drills shall be conducted in the following areas along with the corresponding time frames.

1. Monthly - With the state and local governments within the plume exposure pathway emergency planning zone.
2. Quarterly - With federal emergency response organizations and states within the ingestion pathway.
3. Annually - Between the nuclear facility, state and local emergency operations centers, and field assessment teams.

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(Step 7.2.3 cont.)
(P-1465)

[G. Emergency Response Organization Drills - Drills shall be conducted for the Emergency Response Organization at least four (4) times each calendar year. Federal, State, and local governments shall be invited to observe and critique scheduled exercises and drills.]

H. The above drills may be conducted as individual drills or as an integrated part of a larger scope drill activity.

7.3 DOCUMENTATION OF DRILLS

7.3.1 Documentation for emergency response offsite training (Non-ANO personnel) is maintained by the Arkansas Department of Health's Nuclear Planning and Response Program Office.

7.3.2 Documentation of fire emergency (fire brigade) drills will be in accordance with 1063.020, "Fire Brigade Training Program".

(P-10771, P-4109)

[7.3.3 Documentation for the following drills is the responsibility of the Manager, Emergency Planning. Records of these drills are entered on the ANO Records Management System.

A. Medical Emergency

B. [Radiological Monitoring]

C. Semi-annual Health Physics

D. Radiological Dose Assessment

E. Communications]

8.0 COMMUNICATIONS

8.1 THE EMERGENCY PLANNER(S) SHALL:

8.1.1 Perform the designated quarterly communications test and phone number verification per Procedure 1903.061, "Communications Equipment Tests".

8.1.2 Perform the designated monthly test and quarterly phone number verification per Procedure 1903.061, "Communications Equipment Tests".

8.1.3 Perform annual communications tests between ANO and the county EOC's.

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9.0 EMERGENCY RESPONSE PERSONNEL

9.1 The ANO Emergency Planner(s) shall:

9.1.1 Issue and update letters of assignment, suspension, re-instatement and termination for ERO personnel as required by Procedures 1903.002 and 1903.003.

9.1.2 Determine staffing adequacy when a letter of termination/suspension is issued.

9.1.3 Review the most recent ANO Organizational Chart monthly to ensure that staffing changes in the normal plant organization are reflected in the Emergency Response Organization. Document this review on Form 1903.004E.

(P-10863) 9.1.4 [Ensure that the Emergency Telephone Directory and the Computerized Notification System (CNS) data base are updated on a quarterly basis.]

9.1.5 Perform a critique process to identify strengths, weaknesses and improvement items on all emergency classifications and medical emergencies where the Emergency Medical Team has been activated. The results of the critique should then be published and distributed as a training aid for the other team members. The critique process will be similar to the critique process used for Drills and Exercises. This process is described in the ANO Emergency Planning Drill/Exercise Manual.

10.0 FACILITIES AND EQUIPMENT

10.1 The Emergency Planner(s) shall:

10.1.1 Ensure that periodic inventories of the emergency kits located at ANO, the EOF and St. Mary's Hospital are completed per Procedure 1903.060, "Emergency Supplies and Equipment" and that inventories are maintained.

11.0 [DEDICATED EMERGENCY RESPONSE VEHICLE

(P-10843)

11.1 A vehicle has been dedicated for use as an ANO emergency response vehicle. This vehicle, a four-wheel-drive Chevrolet Blazer, is normally parked at the EOF near the lower west entrance.

11.2 The offsite monitoring section of the Emergency Radiation Team has priority use of this vehicle to conduct field surveys in the event of a radiological release at ANO.

11.3 Keys for this vehicle are located in the red key box outside of Room 110 of the EOF and in the emergency kit in the OSC.

11.4 In the event that the four-wheel drive vehicle becomes unavailable, the Manager of Emergency Planning will designate another ANO vehicle for emergency response use.]

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12.0 OFFSITE SUPPORT ORGANIZATIONS

- 12.1 The Manager, Emergency Planning shall provide the Nuclear Planning and Response Program with appropriate information involving Emergency Plan and Implementing Procedures revisions.
- 12.2 The Manager, Emergency Planning shall maintain liaison between ANO and the Arkansas Department of Health and other appropriate support organizations.
- 12.3 The Manager, Emergency Planning shall coordinate to ensure that letters of agreement with offsite support organizations are reviewed every two years and updated if necessary.

13.0 TRAINING

13.1 TRAINING FOR EMERGENCY PLANNING STAFF

- (P-10860) [13.1.1 The Manager, Emergency Planning and Emergency Planners shall attend, as available, at least one annual training session for professional development to enhance emergency planning skills.]
- 13.2.2 Individuals assigned to a position in the Emergency Response Organization and who also teach Emergency Response Training are allowed attendance credit for classes that they teach. These trainers are not required to take any associated examinations.

(P-4175)

[13.2 OFFSITE TRAINING

- 13.2.1 Training for offsite (non-ANO personnel) emergency response personnel is conducted primarily by the Arkansas Department of Health's Nuclear Planning and Response Program staff. This training is described in Attachment 2, "Description of Offsite Training." The following documentation is kept on file in their office:

- A. Attendance Rosters
- B. Training Course Curriculum

- 13.2.2 In addition to Attachment 2, offsite emergency response personnel (i.e. local government officials and Arkansas Department of Health officials) should receive the following training:

(P-10833)

- A. [Annual review of the Emergency Action Levels.]
- B. Annual review of applicable implementing procedures (to include procedures for notification and, where applicable, site access procedures and identification of coordination personnel).]

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[13.2.3 The Pope County Emergency Medical Service and London Fire Department will be invited to participate in site specific emergency response training sessions provided by ANO personnel. These training sessions should include:

- A. Procedures for notifications
- B. Basic radiation protection
- C. Site Access procedures
- D. Emergency Response functions]

[13.2.4 The following training shall be conducted:

- A. Professional medical consultants shall receive training in the treatment of patients that are contaminated and/ or overexposed.
- B. London Fire Department personnel shall be annually invited to participate in a fire emergency drill.]

[13.2.5 General Public

- A. Training of the public on how they should respond in the event of an emergency at ANO is primarily conducted by the state and local governments.
- B. At least annually ANO shall assist in these efforts by providing information to the Nuclear Planning and Response Program for dissemination to the population within approximately 10 miles of ANO regarding how they will be notified and what their actions should be in an emergency. This information includes the following:
 - 1. Educational information on radiation,
 - 2. Sheltering,
 - 3. Evacuation routes, and
 - 4. Contact for additional information.]

[13.2.6 News Media

A program shall be conducted annually to acquaint the media with the Emergency Plan, information concerning radiation, and points of contact for release of public information in the event of an emergency.]

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14.0 ATTACHMENTS AND FORMS

14.1 ATTACHMENTS

- 14.1.1 Attachment 1 - "Emergency Plan and Implementing Procedures Review"
- 14.1.2 Attachment 2 - "Description of Offsite Training"

14.2 FORMS

- 14.2.1 Form 1903.004A - "Emergency Planning Evaluation/Action Request"
- 14.2.2 Form 1903.004C - "Quarterly Emergency Telephone Directory Review"
- 14.2.3 Form 1903.004D - "EAL Bases Document Review"
- 14.2.4 Form 1903.004E - "ANO Organizational Chart Review"
- 14.2.5 Form 1903.004F - "50.54(q) Screening and Evaluation"
- 14.2.6 Form 1903.004G - "EAL State and Local Agreement"

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ATTACHMENT 1

(P-14145 Complete Attachment)

EMERGENCY PLAN AND
IMPLEMENTING PROCEDURES REVIEW

Emergency Plan and/or
Procedure Revision
Originated



Independent and
Supervisory Review



10CFR50.59
Review



10CFR50.54(q) Review
Emergency Plan/EAL
Changes



Plant Safety
Committee Review



General Manager,
Operations Approval



Vice President
Operations - ANO
Approval



Approved Emergency
Plan Revision

Note: Procedures are approved and implemented at this point. Procedure revisions may subsequently be reviewed by the Vice President, Operations - ANO.

Note: Emergency Plan changes are not approved until all steps are completed.

Note: [Emergency Plan Changes will be submitted to NRC within 30 days as per 10CFR50.4]

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ATTACHMENT 2

DESCRIPTION OF OFFSITE TRAINING

Radiological Monitoring Course - The Radiological Monitoring Course conducted in support of the offsite radiological emergency response plans is a modified version of the standard 12-hour FEMA approved Radiological Monitoring Course. Three additional hours were added to include subject matter pertaining to the radiological emergency response plans, emergency response, environmental surveillance, public information, care centers and hot-line procedures. The course is presented primarily to law enforcement, fire departments and volunteer groups.

Management of Persons Contaminated with Radioactive Material - This training course is approximately 16 hours in duration and is presented to the hospital emergency room staff members and ambulance services who may have a direct support function in the event of an incident at Arkansas Nuclear One. The course includes information concerning emergency response plans, warning system, basic concepts of radiation protection, nuclear radiation, contamination vs. exposure, units and standards, nuclear power plants, personnel dosimetry, radiological detection equipment, dress out techniques, hot-line procedures, decontamination procedures, disposal of contaminated material and emergency handling of radiation accident cases.

Radiological Monitoring (Refresher Training) - The refresher training program is a four (4) hour training program. The program is a review of the Radiological Monitoring Course program with emphasis on radiological detection equipment and area and personnel monitoring.

Management of Persons Contaminated with Radioactive Material (Refresher Training) - The refresher training program is a four (4) hour training program. The program is a review of the 16-hour program with emphasis on changes to emergency response plans, radiological detection equipment, hot-line procedures and decontamination procedures.

School Presentations - A video presentation is made for the purpose of showing students what they should do in the event of an emergency evacuation.

Congregate Lodging Facilities: (Care Center) the Congregate Lodging Facility Training Program is eight (8) hours in duration and is presented to the Care Center Managers and Staff. The course includes information concerning the establishment and operations of a lodging facility for potential evacuees around ANO. The standard American Red Cross material plus FEMA approved material is used in the conduct of this course. In addition to the congregate lodging facility management procedures additional information concerning radiation, decontamination and hot line procedures are included.

Informational Programs on the Nuclear Planning and Response Program (NP&RP) - The length of program is adjusted according to the needs of the audience. The program is designed to inform the public on the off-site activities of NP&RP. Includes information on the emergency plans, warning systems, environmental surveillance,

(P-10861 Complete Form)

REQUEST NO. _____

INSTRUCTIONS: INITIATOR SHOULD COMPLETE STEPS 1-4, THEN FORWARD TO EMERGENCY PLANNING.

EMERGENCY PLANNING EVALUATION/ACTION REQUEST
--

1. DATE _____

2. DESCRIPTION OF PROBLEM/IMPROVEMENT (BE SPECIFIC; USE ADDITIONAL PAGES IF REQUIRED)

3. WRITTEN BY _____ 4. DEPARTMENT _____

5. REVIEWED BY EMERGENCY PLANNING _____ 6. RECOMMEND ACTION: ☐ YES ☐ NO

7. IF NO IS CHECKED IN STEP 6, STATE REASON:

8. ACTION ASSIGNED TO: _____ 9. DUE DATE: _____

10. ACTION TAKEN (DESCRIBE)

11. ACTION COMPLETED BY _____ DATE _____

FORM TITLE:

[EMERGENCY PLANNING EVALUATION/ACTION REQUEST]

FORM NO.

1903.004A

CHANGE

022-02-0

- | | <u>Initials</u> |
|--|-----------------|
| 1. ERO Positions | |
| A. Assigned individuals are listed correctly | _____ |
| B. Assigned telephone, pager and radio numbers correct | _____ |
| 2. ERO Personnel | |
| A. Assigned personnel are listed correctly | _____ |
| B. Assigned telephone and pager numbers correct | _____ |
| 3. Emergency Response Centers | |
| A. Assigned telephone numbers are correct | _____ |
| 4. Emergency Teams/Groups | |
| A. Assigned members are listed correctly | _____ |
| B. Telephone numbers are correct | _____ |
| 5. Technical Assistants/Communicators/EAL Reviewers | |
| A. Assigned members are listed correctly | _____ |
| B. Telephone numbers are correct | _____ |
| 6. Federal Contacts | |
| A. Federal Contact listing is complete | _____ |
| B. Telephone numbers are correct | _____ |
| 7. Industry Contacts | |
| A. Industrial Contact listing is complete | _____ |
| B. Telephone numbers are correct | _____ |
| 8. State and Local contacts | |
| A. Applicable agencies are listed | _____ |
| B. Telephone numbers are correct | _____ |
| 9. TOCC Phone Directory | |
| A. TOCC-Telephone numbers are listed correctly | _____ |

FORM TITLE: QUARTERLY EMERGENCY TELEPHONE DIRECTORY REVIEW	FORM NO. 1903.004C	CHANGE 022-02-0
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- | | <u>Initials</u> |
|--|-----------------|
| 10. Pager Assignments | |
| A. Assigned individuals are listed correctly | _____ |
| B. Pager number assignments are correct | _____ |
| 11. Entergy Corporation Contacts | |
| A. Assigned individual listing is correct | _____ |
| B. Telephone numbers are correct | _____ |
| 12. Procedure Verification | |
| A. Related sections of Procedures 1903.011 correspond to the
Emergency Telephone Directory Listing. | _____ |
| 13. The entries in the Computerized Notification System (CNS) database
have been compared to those in the Emergency Telephone Directory
and changes made as necessary. | _____ |

Comments: _____

Performed by _____ Date _____

Reviewed by _____ Date _____

FORM TITLE:

QUARTERLY EMERGENCY TELEPHONE DIRECTORY REVIEW

FORM NO.

1903.004C

CHANGE

022-02-0

This document provides technical bases which explain the ANO Emergency Action Level criteria found in Procedure 1903.010, "Emergency Action Level Classification". This document is intended for use as a writers guide for procedure 1903.010, a resource for training program development, as a self-study guide, and as a reference for use in audits and inspections.

The following individuals (or their designee's) have reviewed proposed changes to revision _____ of this document for technical accuracy and applicability as emergency classification criteria.

Manager, Operations Unit One

Signature

Date

Manager, Operations Unit Two

Signature

Date

Director, Design Engineering

Signature

Date

Manager, Rad Protection
& Chemistry

Signature

Date

Director, Nuclear Safety
Assurance

Signature

Date

FORM TITLE:

EAL BASES DOCUMENT REVIEW

FORM NO.

1903.004D

CHANGE

022-02-0

1. Review the most recent ANO Organizational Chart to assess how personnel changes have impacted the ERO staffing.
2. List below any personnel changes in the normal organization which will/may have an impact on the ERO staffing.

NAME	ERO POSITION

Comments: _____

Performed by: _____

Reviewed by: _____

FORM TITLE: ANO ORGANIZATIONAL CHART REVIEWS	FORM NO. 1903.004E	CHANGE 022-02-0
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1. DOCUMENT INFORMATION**EP Number** _____

Procedure/Document Number:	Proc./Doc. Revision:
Document Title:	
Was LRS search used? <u>Yes</u> <u>No</u>	
Brief Description of Proposed Revision:	

2. SCREENING

A.) Does the proposed revision require a revision to the Emergency Plan?
Yes No

B.) Does the proposed revision change ANO Emergency Action Levels (EALs)?
Yes No

If the answer to either question is YES, then a 50.54(q) evaluation must be performed. If A.) is checked yes, proceed to section 3. If B.) is checked yes, skip section 3, and proceed to section 4.

3. EMERGENCY PLAN CHANGE INFORMATION

Document change information below (attach additional pages if necessary):

<u>Section</u>	<u>Sub-Section</u>	<u>Page Number(s)</u>

Comments: _____

FORM TITLE:

50.54(Q) SCREENING AND EVALUATION

FORM NO.

1903.004F

CHANGE

022-02-0

4. 10CFR50.47(b) and 10CFR50, APPENDIX E CHECKLIST

Review the planning standards contained in 10CFR50.47(b) and 10CFR50, Appendix E to determine if any of the standards are affected by the change. Check the applicable abbreviated standard below if it is affected.

1.0 10CFR50.47(b) STANDARDS

- (1) ___ Assignment of ERO Responsibilities by licensee, state & county.
- (2) ___ Adequate staffing and response, both Onsite and Offsite.
- (3) ___ Arrangements for assistance, and state and local staff provided for at the EOF.
- (4) ___ Emergency Classification/Action Levels and minimum initial offsite response.
- (5) ___ Notification to state/local/ERO, and Notification to the public provided for.
- (6) ___ Communications-State/local/ERO and the public.
- (7) ___ Information to the public/media on a periodic basis.
- (8) ___ Emergency facilities and equipment are provided and maintained.
- (9) ___ Methods/systems/equipment for monitoring for offsite consequences.
- (10) ___ Protective actions for the plume exposure pathway/EPZ for workers and public.
- (11) ___ Emergency worker exposure controls.
- (12) ___ Medical services for contaminated injured personnel.
- (13) ___ General plans for reentry and recovery.
- (14) ___ Periodic exercises and drills. Deficiencies are identified and corrected.
- (15) ___ Radiological emergency response training provided.
- (16) ___ Responsibilities for Emergency Plan development/review/distribution.

2.0 10CFR50, APPENDIX E STANDARDS

- ___ (I), (II), (III) Emergency Plan as described in the FSAR.
- ___ (IV)A Emergency organization for coping with radiological emergencies.
- ___ (IV)B Assessing the release of radiological material and associated EALs.
- ___ (IV)C Emergency classification and EALs and notification/activation of the ERO.
- ___ (IV)D Notification of NRC, State, locals and public. Dissemination of information.
- ___ (IV)E Emergency facilities/equipment with communications systems and medical arrangements.
- ___ (IV)F Training on and exercising the Emergency Plan.
- ___ (IV)G Plan/Procedure maintenance, and surveillance of equipment and supplies.
- ___ (IV)H Reentry and recovery following an accident.
- ___ (V) Changes to the Emergency Plan and procedures are sent to the NRC.
- ___ (VI) Maintain the Emergency Response Data System (ERDS).

FORM TITLE:	FORM NO.	CHANGE
50.54(Q) SCREENING AND EVALUATION	1903.004F	022-02-0

5. DETERMINATION

YES ___ NO ___ Based upon the section 4 review, does the revision result in the loss of the ability to meet any of the standards described in 10CFR50.47B(b) or 10CFR50, Appendix E, or decrease the effectiveness of the Emergency Plan?

If **YES** is checked, then the revision **must** receive prior approval from the NRC.

If **NO** is checked, provide justification below (attach additional pages, if necessary).

6. JUSTIFICATION

[illegible]

7. APPROVAL

Prepared by: _____ Date: _____
(Signature)

Reviewed by: _____ Date: _____
(Technical Reviewer)

Approved by: _____ Date: _____
(Manager, Emergency Planning)

The following individuals (or their designee's) have reviewed and agreed to the changes to procedure 1903.010, "Emergency Action Levels".

1903.010 Rev.# _____ PC _____

Ark. State Dept. of Health (NP&RP) _____ DATE

Conway County _____ DATE

Johnson County _____ DATE

Logan County _____ DATE

Pope County _____ DATE

Yell County _____ DATE

NOTE: Agreement may be obtained per telephone conversation.

FORM TITLE: EAL STATE AND LOCAL AGREEMENT	FORM NO. 1903.004G	CHANGE 022-02-0
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