

Thursday, September 27, 2001

Document Update Notification

COPYHOLDER NO: 103

TO: NRC - WASHINGTON

ADDRESS: OS-DOC CNTRL DESK MAIL STOP OP1-
17 WASHINGTON DC 20555-DC

DOCUMENT NO: OP-1903.004

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

REVISION NO: 022-03-0

CHANGE NO: PC-03

SUBJECT: PERMANENT CHANGE (PC)



← If this box is checked, please sign, date, and return within 5 days.



ANO-1 Docket 50-313



ANO-2 Docket 50-368

Signature

Date

SIGNATURE CONFIRMS UPDATE HAS BEEN MADE

RETURN TO:

**ATTN: DOCUMENT CONTROL
ARKANSAS NUCLEAR ONE
1448 SR 333
RUSSELLVILLE, AR 72801**

A045

ENTERGY OPERATIONS INCORPORATED ARKANSAS NUCLEAR ONE

TITLE: Admin. & Maintenance Of The Emergency Plan
& Implementing Procedures

DOCUMENT NO.
1903.004

CHANGE NO.
022-03-0

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
Overconfidence
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.
050-00-0

ENTERGY OPERATIONS INCORPORATED ARKANSAS NUCLEAR ONE

Page 1

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

DOCUMENT NO.
1903.004

CHANGE NO.
022-03-0

AFFECTED UNIT:
☒ UNIT 1 ☒ UNIT 2
 ☒ PROCEDURE ☐ ELECTRONIC DOCUMENT
☐ WORK PLAN EXP. DATE: n/a
 SAFETY-RELATED
☒ YES ☐ NO

TYPE OF CHANGE:
☐ NEW ☒ PC ☐ TC ☐ DELETION
☐ REVISION ☐ EZ EXP. DATE: n/a

- DOES THIS DOCUMENT:**
- | | | |
|--|---|--|
| 1. Supersede or replace another procedure?
(If YES, complete 1000.006B for deleted procedure.) (OCAN058107) | <input type="checkbox"/> YES | <input checked="" type="checkbox"/> NO |
| 2. Alter or delete an existing regulatory commitment?
(If YES, coordinate with Licensing before implementing.) (OCNA128509)(OCAN049803) | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO |
| 3. Require a 50.59 review per LI-101? (See also 1000.006, Attachment 15)
(If 50.59 evaluation, OSRC review required.) | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO |
| 4. Cause the MTCL to be untrue? (See Step 8.5 for details.)
(If YES, complete 1000.009A) (1CAN108904, 0CAN099001, 0CNA128509, 0CAN049803) | <input type="checkbox"/> YES | <input checked="" type="checkbox"/> NO |
| 5. Create an Intent Change?
(If YES, Standard Approval Process required.) | <input type="checkbox"/> YES | <input checked="" type="checkbox"/> NO |
| 6. Implement or change IPTE requirements?
(If YES, complete 1000.143A. OSRC review required.) | <input type="checkbox"/> YES | <input checked="" type="checkbox"/> NO |
| 7. Implement or change a Temporary Alteration?
(If YES, then OSRC review required.) | <input type="checkbox"/> YES | <input checked="" type="checkbox"/> NO |

Was the Master Electronic File used as the source document? ☒ YES ☐ NO

INTERIM APPROVAL PROCESS

ORIGINATOR SIGNATURE: (Includes review of Att. 13) DATE: 8-15-01
 Print and Sign name: N/A PHONE #: 4997
SUPERVISOR APPROVAL: * DATE: 8/23/01
N/A
SRO UNIT ONE: ** DATE: 8/23/01
N/A
SRO UNIT TWO: ** DATE: 8/23/01
N/A

STANDARD APPROVAL PROCESS

ORIGINATOR SIGNATURE: (Includes review of Att. 13) DATE: 8-15-01
 Print and Sign name: Duane White PHONE #: 4997

INDEPENDENT REVIEWER: DATE: 8/23/01
[Signature]

ENGINEERING: DATE: 8/23/01
N/A

QUALITY: DATE: 8/23/01
N/A

UNIT SURVEILLANCE COORDINATOR (OCNA049803): DATE: 8/23/01
N/A

SECTION LEADER: DATE: 9/4/01
[Signature] for RVF

QUALITY ASSURANCE: DATE: 9/4/01
N/A

OTHER SECTION LEADERS: DATE: 9/4/01
N/A

OTHER SECTION LEADERS: DATE: 9/4/01
N/A

OTHER SECTION LEADERS: DATE: 9/4/01
N/A

OTHER SECTION LEADERS: DATE: 9/4/01
N/A

OTHER SECTION LEADERS: DATE: 9/4/01
N/A

OTHER SECTION LEADERS: DATE: 9/4/01
N/A

OTHER SECTION LEADERS: DATE: 9/4/01
N/A

Interim approval allowed for non-intent changes requiring no 50.59 evaluation that are stopping work in progress.
 Standard Approval required for intent changes or changes requiring a 50.59 evaluation.
 *If change not required to support work in progress, Department Head must sign.
 **If both units are affected by change, both SRO signatures are required. (SRO signature required for safety related procedures only.)

OSRC CHAIRMAN/TECHNICAL REVIEWER (OCNA049312): DATE: 8/23/01
[Signature]

FINAL APPROVAL: DATE: 9/25/01
[Signature]

REQUIRED EFFECTIVE DATE: 9/27/2001

FORM TITLE:
PROCEDURE/WORK PLAN APPROVAL REQUEST

FORM NO.
1000.006B

CHANGE NO.
051-00-0

ENTERGY OPERATIONS INCORPORATED ARKANSAS NUCLEAR ONE

TITLE: Admin. & Maintenance of the Emergency Plan
& Implementing Procedures

DOCUMENT NO.
1903.004

CHANGE NO.
022-03-0

☒ **PROCEDURE**

☐ **WORK PLAN, EXP. DATE** n/a

PAGE 1 **OF** 4

☐ **ELECTRONIC DOCUMENT**

TYPE OF CHANGE:

☐ **NEW**

☐ **REVISION**

☒ **PC**

☐ **EZ**

☐ **TC**

☐ **DELETION**

EXP. DATE: n/a

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

Made appropriate changes to match proposed changes.

Section 1 Purpose

Added "and provide guidance for the review of changes as required by 10CFR50.54q."

Section 2 Scope

Added "reviews, as required by 10CFR50.54q," to step 2.1.

Section 3 References

Added 3.1.2 10CFR50.54, Conditions of Licenses,
Added 3.1.3 10CFR50.47, Emergency Plans
Added 3.1.4 Emergency Planning and Preparedness for Production and Utilization Facilities
Added 3.1.9 Nuclear Management Manual Policy LI-102 Corrective Action Process
Added 3.1.10 Nuclear Management Manual Procedure LI-101 10CFR50.59 Review Program
Added 3.1.11 NRC Inspection Procedure 71151
Added 3.2.2 Nuclear Management Manual Procedure LI-101 10CFR50.59 Review Program
Added 3.2.3 1903.002, "Assignment of Plant Emergency Team/Group Members"
Added 3.2.4 1903.003, "Assignment of Personnel in the ERO"
Added 3.2.6 1903.062, "Communications System Operating Procedure"
Deleted "3.4.1 OCNA018203 (P-9495) Section 7.1.1A"

Section 4 Definitions

Added the following definitions:

"4.4 Emergency Plan - A document required by 10CFR50, Appendix E which outlines the method of compliance with the standards described in 10CFR50.47b and NUREG 0654. Purpose of this document is to control and direct the response of Emergency Response Organizations to a plant emergency condition as directed in the plan."

"4.7 Implementing Procedures - Emergency plan procedures provide detailed direction for the Emergency Response Organization and implement actions directed by the Emergency Plan."

"4.14 Plan Change - A minor change or informal change to the Emergency Plan."

"4.15 Plan Revision - The formal revision of the Emergency Plan which may incorporate one or more approved plan changes."

FORM TITLE:

DESCRIPTION OF CHANGE

FORM NO.
1000.006C

CHANGE NO.
050-00-0

ENTERGY OPERATIONS INCORPORATED ARKANSAS NUCLEAR ONE

TITLE: Admin. & Maintenance of the Emergency Plan
& Implementing Procedures

DOCUMENT NO.
1903.004

CHANGE NO.
022-03-0

☒ **PROCEDURE**

☐ **WORK PLAN, EXP. DATE** n/a

PAGE 2 **OF** 4

☐ **ELECTRONIC DOCUMENT**

TYPE OF CHANGE:

☐ **NEW**

☐ **REVISION**

☒ **PC**

☐ **EZ**

☐ **TC**

☐ **DELETION**

EXP. DATE: n/a

AFFECTED SECTION:
(Include step # if applicable)

DESCRIPTION OF CHANGE: (For each change made, include sufficient detail to describe reason for the change.)

Section 5.1

Added "The Director, Nuclear Safety Assurance is responsible for ensuring that changes which require prior NRC approval are submitted to the NRC and ensuring that periodic 10CFR50.54 submittals are made in accordance with the regulatory requirements."

Section 5.2

Added "Distributing revisions to the Emergency Plan or implementing procedures to the NRC within 30 days of their implementation, as specified in 10CFR50.54(q) and 10CFR50, Appendix E."

Section 5.3

Added "The Emergency Planner(s) are responsible for preparing the 10CFR50.54 evaluation by researching appropriate reference material and documenting the answers to the questions on the appropriate review form."

Step 6.1.1.J

Changed "6.3" to "6.4"

Section 6.2

Changed "Emergency Plan Changes" to "Emergency Plan Revisions/Changes"

Step 6.2.4

Changed "Form 1903.004B" to "Form 1903.004H." Changed "10CFR50.54(q) Evaluation Checklist" to "10CFR50.54(q) Evaluation."

Step 6.3.3

Changed "form 1903.004F" to "Form 1903.004H."

Step 6.4.1

Added "/Changes"

Step 6.4.2

Added "/changes"

Step 6.4.3

Deleted note prior to step 6.3.3 and made a step 6.3.3 "Revisions/Changes to Procedure 1903.010, "Emergency Action Level Classification", shall be independently reviewed by the Unit One and/or Unit Two Operations Manager."

Step 6.4.4

Added "any of the following:" In step 6.4.4.A added, "Revisions/Changes". In step 6.4.4.B added, "Revisions/Changes to any implementing procedure that affects the Emergency Plan or procedure 1903.010, "Emergency Action Level Classification".

Step 6.4.5

Added "shall review any revisions/changes to Procedure 1903.010, "Emergency Action Levels" with the" and deleted "obtained, agreement, of changes to 1903.010, "Emergency Action Levels". Use form 1903.004G."

Step 6.4.6 and 7

Added "/change"

FORM TITLE:

DESCRIPTION OF CHANGE

FORM NO.
1000.006C

CHANGE NO.
050-00-0

ENTERGY OPERATIONS INCORPORATED ARKANSAS NUCLEAR ONE

TITLE: Admin. & Maintenance of the Emergency Plan
& Implementing Procedures

DOCUMENT NO.
1903.004

CHANGE NO.
022-03-0

☒ **PROCEDURE**

☐ **WORK PLAN, EXP. DATE** n/a

PAGE 3 **OF** 4

☐ **ELECTRONIC DOCUMENT**

TYPE OF CHANGE:

☐ **NEW**

☐ **REVISION**

☒ **PC**

☐ **EZ**

☐ **TC**

☐ **DELETION**

EXP. DATE: n/a

AFFECTED SECTION:
(Include step # if applicable)

DESCRIPTION OF CHANGE: (For each change made, include sufficient detail to describe reason for the change.)

Step 7.1.1.A

Deleted, "(P-9495)" and "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.]"

Step 7.1.1.B

Deleted, "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"

Step 7.1.1.D

Added "/drill"

Step 7.1.1.E

Deleted "Scenario" and replaced with "narrative summary"
Deleted "Drill/Exercise Evaluation Summary Sheets" and replaced with "Objectives".
Deleted "Documentation addressing action taken on each finding from the drill/exercise"
Added 3. "Attendance roster (maintained in training database) 4. Correction Actions (maintained in corrective actions database and Emergency Planning Action Tracking System (EPATS)), 5. Emergency Planning should maintain a master copy of each full scale drill or exercise."

Step 11.0

Added, " in the parking lot West of discharge canal near the entrance to the Administration Building." and deleted "at the EOF near the lower West entrance."

Step 13.2.5.B

Deleted "At least annually" and added "as agreed upon by ANO, the State and regulators"

Step 14.2

Added "14.2.7 Form 1903.004H, "50.54(q) Evaluation"

Attachment 1

Deleted old chart and added new chart.

Form 1903.004A

Step 2 deleted "required" and added "necessary"

Form 1903.004E

Added line for DATE

Form 1903.004F

Deleted old 50.54q form and added new corporate screening form.

Form 1903.004G

Deleted "and agreed to" moved note for telephone conversation review to top of page.

Form 1903.004H

Added from for new corporate 50.54q evaluation.

FORM TITLE:

DESCRIPTION OF CHANGE

FORM NO.
1000.006C

CHANGE NO.
050-00-0

ENTERGY OPERATIONS INCORPORATED
ARKANSAS NUCLEAR ONE

TITLE: Admin. & Maintenance of the Emergency Plan
& Implementing Procedures

DOCUMENT NO.
1903.004

CHANGE NO.
022-03-0

☒ PROCEDURE

☐ WORK PLAN, EXP. DATE n/a

PAGE 4 OF 4

☐ ELECTRONIC DOCUMENT

TYPE OF CHANGE:

☐ NEW

☐ REVISION

☒ PC

☐ EZ

☐ TC

☐ DELETION

EXP. DATE: n/a

AFFECTED SECTION:
(Include step # if
applicable)

Step 6.1.1

From 1903.004C

DESCRIPTION OF CHANGE: (For each change made, include sufficient detail to describe
reason for the change.)

Changes "Emergency Planning Supervisor" to "Emergency Planning Manager"

Changed "Intials" to "check"

FORM TITLE:

DESCRIPTION OF CHANGE

FORM NO.
1000.006C

CHANGE NO.
050-00-0

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 1 of 32 CHANGE: 022-03-0
---------------------------------	---	-----------------------------------

TABLE OF CONTENTS

<u>SECTIONS</u>	<u>PAGE NO.</u>
1.0 Purpose.....	3
2.0 Scope.....	3
3.0 References.....	3
4.0 Definitions.....	5
5.0 Responsibility and Authority.....	7
6.0 Instructions	8
6.1 Review and Updating of the Emergency Plan and Implementing Procedures	8
6.2 Emergency Plan Changes	9
6.3 Approval of Emergency Plan Revisions (As Shown in Attachment 1) shall be provided As Follows:	10
6.4 Approval of Emergency Plan Implementing Procedure Revisions shall be provided as Follows	10
6.5 Review and Revision of the EAL Bases Document	11
6.6 Review Of Transmittals to NRC	12
7.0 Drills and Exercises.....	12
7.2 Conducting Drills and Exercises	13
7.3 Documentation of Drills	16
8.0 Communications.....	16
9.0 Emergency Response Personnel.....	17
10.0 Facilities and Equipment.....	17
11.0 Dedicated Emergency Response Vehicle.....	17
12.0 Offsite Support Organizations.....	18
13.0 Training.....	18
13.1 Training for Emergency Planning Staff	18
13.2 Offsite Training	18

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 2 of 32 CHANGE: 022-03-0
---------------------------------	---	-----------------------------------

TABLE OF CONTENTS (Cont.)

<u>SECTIONS</u>	<u>PAGE NO.</u>
14.0 Attachments and Forms	20
14.1 Attachments	
14.1.1 Attachment 1, Emergency Plan and Implementing Procedures Review	21
14.1.2 Attachment 2, Description of Offsite Training	22
14.2 Forms	
14.2.1 Form 1903.004A - "Emergency Planning Evaluation/Action Request"	23
14.2.2 Form 1903.004C - "Quarterly Emergency Telephone Directory Review"	24
14.2.3 Form 1903.004D - "EAL Bases Document Review"	26
14.2.4 Form 1903.004E - "ANO Organizational Chart Review"	27
14.2.5 Form 1903.004F - "50.54(q) Screening"	28
14.2.6 Form 1903.004G - "EAL State and Local Agreement" ..	29
14.2.7 Form 1903.004H - "50.54(q) Evaluation"	30

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 3 of 32 CHANGE: 022-03-0
-------------------------------------	---	---------------------------------------

1.0 PURPOSE

The purpose of this procedure is to describe the methods for administration and maintenance of the Emergency Plan and associated procedures and provide guidance for the review of changes as required by 10CFR50.54q.

2.0 SCOPE

- 2.1 This procedure describes the responsibilities of the ANO Emergency Planning Staff in regard to the reviews, as required by 10CFR50.54q, 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 10CFR50.54, Conditions of Licenses, 10CFR50.54(q), 10CFR50.54(t)
- 3.1.3 10CFR50.47, Emergency Plans
- 3.1.4 10CFR50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities
- 3.1.5 NUREG-0654, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants"
- 3.1.6 1000.006, "Procedure Review, Approval, and Revision Control"
- 3.1.7 NUREG 0660, "NRC Action Plan Developed as a Result of the TMI-2 Accident"
- 3.1.8 Memorandum ANO-81-9510 (as amended by the SRC November 16, 1981)

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 4 of 32 CHANGE: 022-03-0
---------------------------------	---	-----------------------------------

- 3.1.9 Nuclear Management Manual Policy LI-102, Corrective Action Process
- 3.1.10 Nuclear Management Manual Procedure LI-101, 10CFR50.59 Review Program
- 3.1.11 NRC Inspection Procedure 71151
- 3.2 REFERENCES USED IN CONJUNCTION WITH THIS PROCEDURE:
 - 3.2.1 1000.150, "Licensing Document Maintenance"
 - 3.2.2 Nuclear Management Manual Procedure LI-101, "10CFR50.59 Review Program"
 - 3.2.3 1903.002, "Assignment of Plant Emergency Team/Group Members"
 - 3.2.4 1903.003, "Assignment of Personnel to the Emergency Response Organization"
 - 3.2.5 1903.010, "Emergency Action Level Classification"
 - 3.2.6 1903.062, "Communications System Operating Procedure"
- 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 0CAN068320 (P-10767) Section 6.1.1H
 - 3.4.2 0CAN048205 (P-10843) Section 11.0
 - 3.4.3 0CAN128211 (P-10861) Section 5.5, Form 1903.004A
 - 3.4.4 0CAN128211 (P-10863) Section 9.1.4
 - 3.4.5 10CFR50. APP E.V. (P-14145), Attachment 1
 - 3.4.6 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
 - 3.4.7 0CAN128211 (P-10860) Emergency Planning Coordinators shall attend, as available, at least one training session concerning emergency preparedness annually. Section 13.1.1

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 5 of 32 CHANGE: 022-03-0
---------------------------------	---	-----------------------------------

- 3.4.8 OCAN068320 (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
- 3.4.9 OCAN068320 (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)
- 3.4.10 OCAN068320 (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
- 3.4.11 OCAN068320 (P-10772) Conduct Exercises in accordance with NRC and FEMA rules. Section 7.2.2
- 3.4.12 OCAN128305 (P-4109) Demonstrating communications and record keeping capabilities. Section 7.2.3.C
- 3.4.13 OCAN128305 (P-4175) Annual training of Off-Site Personnel. Sections 13.2
- 3.4.14 OCAN098106 (P-4822) Practical training sessions for monitoring team members. Section 7.2.3
- 3.4.15 OCAN058203 (P-10872) Training for individuals who are assigned responsibility for emergency preparedness is necessary for effective emergency planning. Section 13.1
- 3.4.16 OCAN079009 (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 that provides the technical bases for initiating conditions used to classify plant related emergencies.
- 4.4 Emergency Plan - A document required by 10CFR50, Appendix E which outlines the method of compliance with the standards described in 10CFR50.47b and NUREG 0654. Purpose of this document is to control and direct the response of Emergency Response Organizations to a plant emergency condition as directed in the plan.

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 6 of 32 CHANGE: 022-03-0
---------------------------------	---	-----------------------------------

- 4.5 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.
- 4.6 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.
- 4.7 Implementing Procedures - Emergency plan procedures provide detailed direction for the Emergency Response Organization and implement actions directed by the Emergency Plan.
- 4.8 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.
- 4.9 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.
- 4.10 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.
- 4.11 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.
- 4.12 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.
- 4.13 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.
- 4.14 Plan Change - A minor change or informal change to the Emergency Plan.
- 4.15 Plan Revision - The formal revision of the Emergency Plan which may incorporate one or more approved plan changes.
- 4.16 Position Workbook - A workbook prepared for a specific ERO position. These workbooks may be used in place of classroom instruction in requalification training.

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 7 of 32 CHANGE: 022-03-0
-------------------------------------	---	---------------------------------------

4.17 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.

4.18 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, which meets these criteria. Any of these activities may be conducted in one or more segments.)

4.19 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.

The Director, Nuclear Safety Assurance is responsible for ensuring that changes which require prior NRC approval are submitted to the NRC and ensuring that periodic 10CFR50.54 submittals are made in accordance with the regulatory requirements.

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.
- Distributing revisions to the Emergency Plan or implementing procedures to the NRC within 30 days of their implementation, as specified in 10CFR50.54(q) and 10CFR50, Appendix E.

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 8 of 32 CHANGE: 022-03-0
---------------------------------	---	-----------------------------------

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.
- The Emergency Planner(s) are responsible for preparing the 10CFR50.54 evaluation by researching appropriate reference material and documenting the answers to the questions on the appropriate review form.

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 Manager or 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.

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 9 of 32 CHANGE: 022-03-0
---------------------------------	---	-----------------------------------

(6.1.1 con't)

- 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.
- 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.
- [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 6.4 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.

(P-10767)

6.2 Emergency Plan Revisions/Changes

- 6.2.1 Plan changes may be requested by any person within Entergy, State, Local, or Federal Emergency Response Agencies (e.g. Nuclear Regulatory Commission) by notifying the Manager, Emergency Preparedness at the applicable site.
- 6.2.2 Before initiating revisions to the Emergency Plans. An evaluation is conducted of proposed changes to ensure compliance with the requirements of 10CFR50.
- 6.2.3 Such an evaluation shall be conducted by Emergency Planning and approved by the Manager, Emergency Preparedness.
- 6.2.4 The evaluation is documented on Form 1903.004H, "10CFR50.54(q) Evaluation", and is included as part of the revision package for the approval cycle.
- 6.2.5 This evaluation is used to document changes to the Emergency Plan. If possible, a markup of the applicable sections of the Emergency Plan with the proposed changes is attached to the evaluation form.

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 10 of 32 CHANGE: 022-03-0
---------------------------------	---	------------------------------------

- 6.2.6 Revisions to the Emergency Plan may be made without prior NRC approval provided that:
- A. There is no decrease in the effectiveness of the Emergency Plan,
 - B. The Emergency Plan continues to meet the requirements of 10CFR50.
- 6.2.7 Proposed changes that decrease the effectiveness of the approved Emergency Plan shall not be implemented without prior NRC approval.
- 6.3 Approval of Emergency Plan Revisions/Changes (as shown in Attachment 1) shall be provided as follows:
- 6.3.1 Revisions to the Emergency Plan shall be coordinated by the Emergency Planner(s).
 - 6.3.2 The Emergency Planner(s) shall perform an independent review of the Emergency Plan revision.*
 - 6.3.3 The Emergency Planner(s) shall perform a 50.54(q) review for all Emergency Plan revisions (Form 1903.004H).
 - 6.3.4 The Emergency Plan revision approval process will be conducted in accordance with Licensing Document Maintenance Procedure.
 - 6.3.5 The approved plan revision shall be distributed in accordance with established document control procedures.
 - 6.3.6 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.
 - 6.3.7 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.
 - 6.3.8 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.
- 6.4 Approval of Emergency Plan Implementing Procedure Revisions/Changes shall be provided as follows:
- 6.4.1 Revisions/Changes to the Emergency Plan Implementing Procedures shall be coordinated by the Emergency Planner(s).

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 11 of 32 CHANGE: 022-03-0
---------------------------------	---	------------------------------------

- 6.4.2 The Emergency Planner(s) may perform an independent review of the Emergency Plan Implementing Procedure revision/change.
- 6.4.3 Revisions/Changes to Procedure 1903.010, "Emergency Action Level Classification", shall be independently reviewed by the Unit One and/or Unit Two Operations Manager.
- 6.4.4 The Emergency Planner(s) shall perform a 50.54(q) review for any of the following:
 - A. Revisions/Changes to the Emergency Action Levels (EALs) contained in Procedure 1903.010, "Emergency Action Level Classification"
 - B. Revisions/Changes to any implementing procedure that affects the Emergency Plan or procedure 1903.010, "Emergency Action Level Classification".
- 6.4.5 The Emergency Planner (s) shall review any revisions/changes to Procedure 1903.010, "Emergency Action Levels" with the State and local government authorities prior to approval.
- 6.4.6 The Emergency Plan Implementing Procedures revision/change approval process will follow the requirements of Procedure 1000.006, "Procedure Control".
- 6.4.7 The approved procedure revision/change shall be distributed in accordance with established document control procedures.
- 6.5 Review and Revision of the EAL Bases Document
 - 6.5.1 The review and revision of the EAL Bases Document will be coordinated by Emergency Planning.
 - 6.5.2 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, Radiation Protection and Chemistry
 - D. Director, Nuclear Safety Assurance
 - 6.5.3 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.

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 12 of 32 CHANGE: 022-03-0
-------------------------------------	---	--

6.6 Review of Transmittals to NRC

- 6.6.1 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:

- A. Submit a copy of the biennial emergency preparedness exercise scenario manual to the NRC regional office approximately 30 days prior to the exercise date in accordance with NRC Inspection Procedure 71151.
- B. Submit a copy of the drill scenario to the NRC Resident Inspector approximately 14 days prior to the drill date.
- 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/drill 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. Narrative Summary
 2. Objectives
 3. Attendance roster (maintained in training database)
 4. Correction Actions (maintained in corrective actions database and Emergency Planning Action Tracking System (EPATS))
 5. Emergency Planning should maintain a master copy of each full scale drill or exercise.
- F. Provide the Vice President, Operations - ANO with a report of findings and recommended corrective actions, resulting from the exercise critiques.

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 13 of 32 CHANGE: 022-03-0
---------------------------------	---	------------------------------------

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. TableTop 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)

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 14 of 32 CHANGE: 022-03-0
---------------------------------	---	------------------------------------

(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)

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 15 of 32 CHANGE: 022-03-0
---------------------------------	---	------------------------------------

(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 implant 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.

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 16 of 32 CHANGE: 022-03-0
---------------------------------	---	------------------------------------

(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 1903.062, "Communications System Operating Procedure".
- 8.1.2 Perform the designated monthly test and quarterly phone number verification per Procedure 1903.062, "Communications System Operating Procedure".
- 8.1.3 Perform annual communications tests between ANO and the county EOC's.

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 17 of 32 CHANGE: 022-03-0
---------------------------------	---	------------------------------------

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 in the parking lot West of discharge canal near the entrance to the Administration Building.
- 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.]

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 18 of 32 CHANGE: 022-03-0
---------------------------------	---	------------------------------------

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).]

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 19 of 32 CHANGE: 022-03-0
---------------------------------	---	------------------------------------

[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 invited annually 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. ANO shall assist in these efforts by providing information, as agreed upon by ANO, the State and regulators, 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.]

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 20 of 32 CHANGE: 022-03-0
---------------------------------	---	------------------------------------

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

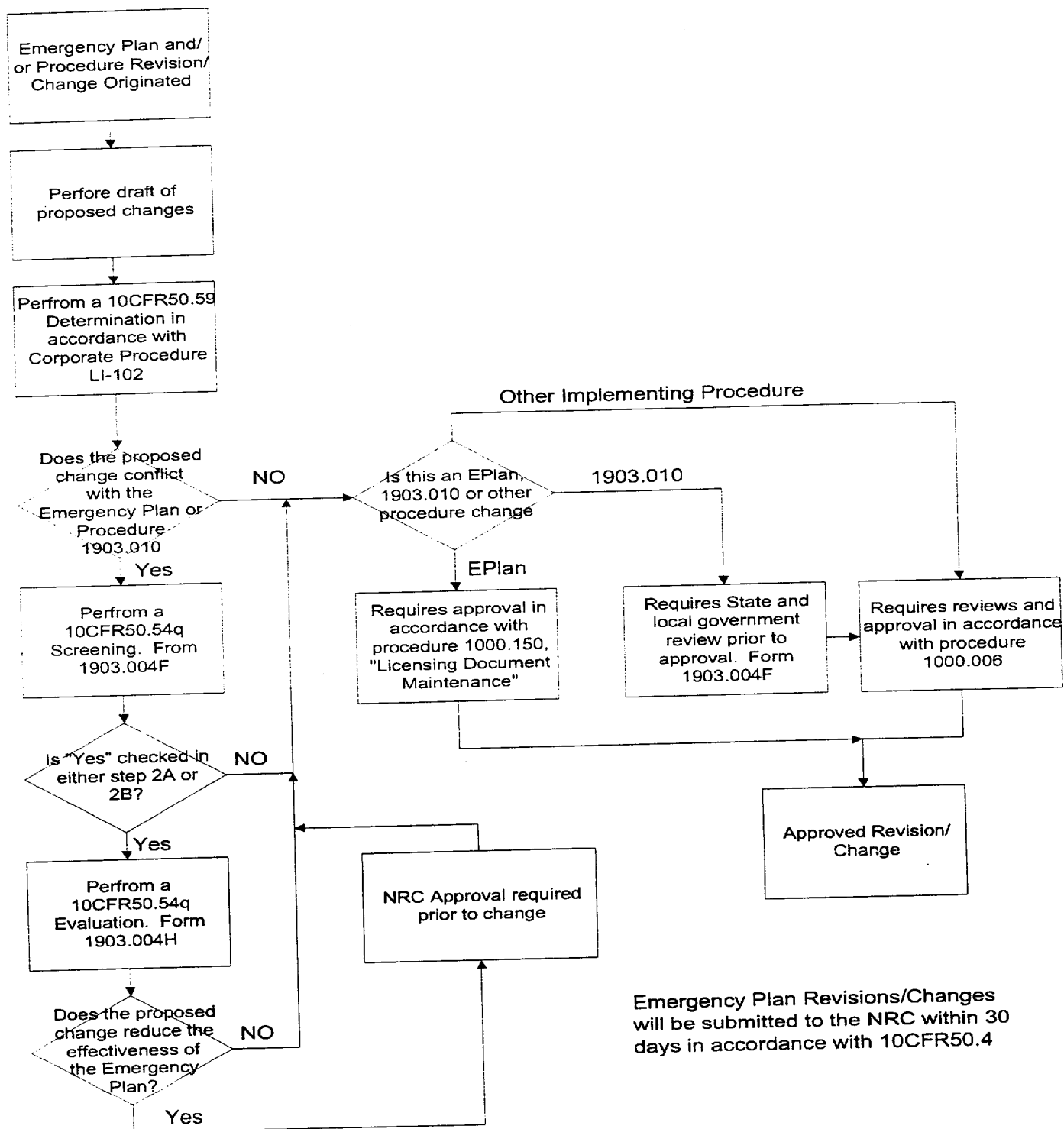
- 14.2.1 Form 1903.004A - "Emergency Planning Evaluation/Action Request"
- 14.2.2 Form 1903.004C - "Quarterly Emergency Telephone Directory Review"
- 14.2.3 Form 1903.004D - "EAL Bases Document Review"
- 14.2.4 Form 1903.004E - "ANO Organizational Chart Review"
- 14.2.5 Form 1903.004F - "50.54(q) Screening"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

PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 21 of 32 CHANGE: 022-03-0
---------------------------------	---	------------------------------------

ATTACHMENT 1

(P-14145 Complete Attachment)

EMERGENCY PLAN AND
IMPLEMENTING PROCEDURES REVIEW



PROC./WORK PLAN NO. 1903.004	PROCEDURE/WORK PLAN TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	PAGE: 22 of 32 CHANGE: 022-03-0
-------------------------------------	---	--

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 necessary.)

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

11. Action Complete By: _____ Date: _____

FORM TITLE:

[EMERGENCY PLANNING EVALUATION/ACTION REQUEST]

FORM NO.

1903.004A

CHANGE

022-03-0

Page 1 of 2

Check

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

022-03-0

10. Pager Assignments

Check

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

022-03-0

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

022-03-0

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: _____ Date: _____

Reviewed by: _____ Date: _____

FORM TITLE: ANO ORGANIZATIONAL CHART REVIEWS	FORM NO. 1903.004E	CHANGE 022-03-0
--	------------------------------	---------------------------

1. DOCUMENT INFORMATION EP Number _____

Procedure/Document Number:	Proc./Doc. Revision:
Document Title:	
Brief Description of Proposed Revision:	

2. SCREENING

- A.) Does the proposed revision require a change to the Emergency Plan?
 ____ Yes ____ No
- B.) Does the proposed revision change the site Emergency Action Levels (EALs)?
 ____ Yes ____ No

If the answer to either question is YES, then a 50.54(q) evaluation must be performed. See Form 1903.004H.

3. APPROVAL

Screening Completed By: _____
Signature Date

Screening Reviewed By: _____ Signature _____ Date _____

FORM TITLE:	50.54(Q) SCREENING	FORM NO. 1903.004F	CHANGE 022-03-0
-------------	--------------------	-----------------------	--------------------

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

1903.010 Rev.# _____

NOTE

Review may be obtained per telephone conversation.

Ark. State Dept. of Health (NP&RP): _____	_____	DATE
Conway County: _____	_____	DATE
Johnson County: _____	_____	DATE
Logan County: _____	_____	DATE
Pope County: _____	_____	DATE
Yell County: _____	_____	DATE

FORM TITLE: EAL STATE AND LOCAL AGREEMENT	FORM NO. 1903.004G	CHANGE 022-03-0
---	------------------------------	---------------------------

1. Document Changed:	
2. Emergency Plan Section(S) <u>Or</u> Procedure Section(S):	
3. Revision Number:	
4. Document Reviewed: <i>Include Page Number and Section Number where Applicable</i>	
5. Proposed Change (s):	
<p>6. 10CFR50.54(q) states in part: "The nuclear power reactor licensee may make changes to these plans without Commission approval only if the changes do not decrease the effectiveness of the plans and the plans, as changed, continue to meet the standards of 50.47(b) and the requirements of Appendix E of 10CFR 50." 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.</p> <p><u>10CFR50.47(b) STANDARDS</u></p> <ul style="list-style-type: none"> (1) <input type="checkbox"/> Assignment of ERO Responsibilities by licensee, state & county. (2) <input type="checkbox"/> Adequate staffing and response, both Onsite and Offsite. (3) <input type="checkbox"/> Arrangements for assistance, and state and local staff provided for at the EOF. (4) <input type="checkbox"/> Emergency Classification/Action Levels and minimum initial offsite response. (5) <input type="checkbox"/> Notification to state/local/ERO, and Notification to the public provided for. (6) <input type="checkbox"/> Communications-State/local/ERO and the public. (7) <input type="checkbox"/> Information to the public/media on a periodic basis. (8) <input type="checkbox"/> Emergency facilities and equipment are provided and maintained. (9) <input type="checkbox"/> Methods/systems/equipment for monitoring for offsite consequences. (10) <input type="checkbox"/> Protective actions for the plume exposure pathway/EPZ for workers and public. (11) <input type="checkbox"/> Emergency worker exposure controls. (12) <input type="checkbox"/> Medical services for contaminated injured personnel. (13) <input type="checkbox"/> General plans for reentry and recovery. (14) <input type="checkbox"/> Periodic exercises and drills. Deficiencies are identified and corrected. (15) <input type="checkbox"/> Radiological emergency response training provided. (16) <input type="checkbox"/> Responsibilities for Emergency Plan development/review/distribution. 	

FORM TITLE:	50.54 (Q) EVALUATION	FORM NO. 1903.004H	CHANGE 022-03-0
-------------	----------------------	-----------------------	--------------------

9. APPROVAL

1.0		
Prepared by:	_____	Date: _____
	(Signature)	
Reviewed by:	_____	Date: _____
	(Technical Reviewer)	
Approved by:	_____	Date: _____
	(Manager, Emergency Planning)	

FORM TITLE:	50.54(Q) EVALUATION	FORM NO. 1903.004H	CHANGE 022-03-0
-------------	---------------------	-----------------------	--------------------