



Entergy Operations, Inc.  
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December 13, 2001

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Subject: Changes to Emergency Plan Implementing Procedures – December 13, 2001  
Grand Gulf Nuclear Station  
Docket No. 50-416  
License No. NPF-29

GNRO-2001/00092

Ladies & Gentlemen:

Entergy Operations, Inc. submits in accordance with 10CFR50 Appendix E, Section V changes to the following Emergency Plan Implementing Procedure:

01-S-10-4 Rev. 9

This letter does not contain any commitments.

Yours truly,

A handwritten signature in black ink, appearing to be "CAB", with a long horizontal stroke extending to the right.

Charles A. Bottemiller,  
Licensing Manager

MJL

attachment: 1. Procedure 01-S-10-4  
cc:

(See Next Page)

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cc:

Hoeg	T. L.	(GGNS Senior Resident)	(w/a)
Levanway	D. E.	(Wise Carter)	(w/a)
Reynolds	N. S.		(w/a)
Smith	L. J.	(Wise Carter)	(w/a)
Thomas	H. L.		(w/o)

Mr. E. W. Merschoff (w/2) Regional Administrator U.S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011	ALL LETTERS
U.S. Nuclear Regulatory Commission ATTN: Mr. S. P. Sekerak, NRR/DLPM (w/2) <b>ATTN: FOR ADDRESSEE ONLY</b> Mail Stop O7D1 Rockville, MD 20555-0001	ALL LETTERS

PLANT OPERATIONS MANUAL

Volume 01  
Section 10

01-S-10-4  
Revision: 9  
Date: 12/11/01

ADMINISTRATIVE PROCEDURE

EMERGENCY PREPAREDNESS DRILLS AND EXERCISES

SAFETY RELATED

Prepared: Richard Hurall  
Reviewed: [Signature]  
Technical  
Concurred: OK for M.F. Guyon  
Responsible Manager  
OSRC: [Signature]  
Approved: [Signature] Plant General Manager, [Signature] Manager, Emergency Preparedness

List of Effective Pages:

Pages 1-11

Attachments I-III

List of TCNs Incorporated:

<u>Revision</u>	<u>TCN</u>
0	None
1	1
2	None
3	None
4	None
5	None
6	None
7	None
8	None
9	None

Title: Emergency Preparedness Drills and Exercises	No.: 01-S-10-4	Revision: 9	Safety Evaluation
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Facility: GGNSDocument Reviewed: 01-5-10-4 Rev. 9

System Designator(s): \_\_\_\_\_

Check the applicable review(s):

<input checked="" type="checkbox"/>	SCREENING	Sections I, II, and III required
<input type="checkbox"/>	50.59 EVALUATION EXEMPTION	Sections I, II, III, and IV required
<input type="checkbox"/>	50.59 EVALUATION  Evaluation #: _____	Sections I, II, III, and V required

**NOTE: Only the sections required as indicated above must be included in the Review.****I. SIGNATURES / OVERVIEW**Preparer: Richard Sumrall Richard Sumrall/EOI/EP/12-3-2001  
Signature / Name (print) / Company / Department / DateReviewer: Richard VanDerAkker /EOI/NSA-EP/12-4-01  
Signature / Name (print) / Company / Department / Date(PSRC): N/A  
Chairman's Signature / Date (N/A for Screenings and 50.59 Evaluation Exemptions)**List of Assisting/Contributing Personnel:**

Name:	Scope of Assistance:
_____	_____
_____	_____
_____	_____

**Description of Proposed Change:**

Adds requirement for Controllers and Evaluators to be present in their assigned facility at least 30 minutes prior to activation of their assigned facility. Title changes to reflect current UFSAR. Grammatical changes. Adds requirement for Personnel assigned as Controllers or Evaluators to attend Controller/Evaluator Training prior to performing in these roles for the first time and annually if they continue to perform in the Controller/Evaluator role.

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## II. SCREENING

### A. Licensing Basis Document Review

Does the proposed activity impact the facility or a procedure as described in any of the following Licensing Basis Documents?

<i>Operating License</i>	YES	NO	N/A	<i>CHANGE # and/or SECTIONS TO BE REVISED</i>
Operating License	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
TS	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
NRC Orders	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", obtain NRC approval prior to implementing the change. (See Section 5.1.13 for exceptions.)				

<i>LBDs controlled under 50.59</i>	YES	NO	N/A	<i>CHANGE # and/or SECTIONS TO BE REVISED</i>
UFSAR	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
TS Bases	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Technical Requirements Manual	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Core Operating Limits Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Fire Hazard Analysis	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Fire Protection Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Offsite Dose Calculations Manual	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Process Control Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
NRC Safety Evaluation Reports <sup>1</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
If "YES", perform an Exemption Review per Section IV <u>OR</u> perform a 50.59 Evaluation per Section V.				

<i>LBDs controlled under 72.48</i>	YES	NO	N/A	<i>CHANGE # and/or SECTIONS TO BE REVISED</i>
Cask UFSAR	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Certificate of Compliance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If "YES", evaluate/process any changes in accordance with 72.48				

<i>LBDs controlled under other regulations</i>	YES	NO	N/A	<i>CHANGE # and/or SECTIONS TO BE REVISED</i>
Quality Assurance Program Manual <sup>2</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Emergency Plan <sup>2</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Security Plan <sup>2, 3</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Inservice Inspection Program <sup>4</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Inservice Testing Program <sup>4</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
If "YES", evaluate/process any changes in accordance with the appropriate regulation.				

<sup>1</sup> If "YES," see Section 5.1.5.

<sup>2</sup> If "YES," notify the responsible department and ensure a 50.54 Evaluation is performed.

<sup>3</sup> The Security Plan is classified as safeguards and can only be reviewed by personnel with the appropriate security clearance. The Preparer should notify the security department of potential changes to the Security Plan.

<sup>4</sup> If "YES," process the change in accordance with the 10CFR50.55a control program.

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**B. Does the proposed activity involve a test or experiment not described in the FSAR?**

☐ Yes  
☒ No

If "yes," perform an Exemption Review per Section IV OR perform a 50.59 Evaluation per Section V.

**C. Basis**

(Provide a basis for the "no" items checked in Sections II.A and II.B, above. Adequate basis must be provided within the Screening such that a third-party reviewer can reach the same conclusions. Simply stating that the change does not affect TS or the FSAR is not an acceptable basis. If a 50.59 Evaluation is required, this section may be N/A'd.)

Performed a search of the online Operating License, Tech Specs, UFSAR, TS Bases, TRM, ODCM, SERS, PCP, Emergency Plan, and QAPM for the keywords 'drill controller' and 'drill evaluator'. Evaluated all returned hits. Previous reviews of the COLR, Fire Hazard Analysis, Fire Protection Program, Inservice Inspection Program and Inservice Testing Program indicate that EP requirements do not affect these documents.

**D. Is the validity of this Review dependent on any other change?**

(See Section 5.2.2.4 of the EOI 10CFR50.59 Program Review Guidelines)

☐ Yes  
☒ No

If "Yes," list the required changes.

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**E. References**

[Discuss the methodology for performing the LBD search. State the location of relevant licensing document information and explain the scope of the review such as electronic search criteria used (e.g., key words) or the general extent of manual searches per Section 5.2.2.4 of LI-101.]

Documents:

Keywords:

online Operating License, Tech Specs, UFSAR, TS Bases, TRM, ODCM, SERS, PCP, Emergency Plan, and QAPM

drill controller, drill evaluator

FSAR Sections Reviewed:

FSAR Figures Reviewed:

n/a  

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n/a  

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### III. ENVIRONMENTAL SCREENING

If any of the following questions is answered "yes," an Environmental Review must be performed in accordance with NMM Procedure EV-115, "Environmental Evaluations."

Will the proposed Change being evaluated:

Yes

No

- |                          |                                     |  |
|--------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve a land disturbance of previously disturbed land areas in excess of one acre (i.e., grading activities, construction of buildings, excavations, reforestation, creation or removal of ponds)? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve a land disturbance of undisturbed land areas (i.e., grading activities, construction, excavations, reforestation, creating, or removing ponds)?  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve dredging activities in a lake, river, pond, or stream?   |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Increase the amount of thermal heat being discharged to the river or lake?   |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Increase the concentration or quantity of chemicals being discharged to the river, lake, or air?   |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Discharge any chemicals new or different from that previously discharged?  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Change the design or operation of the intake or discharge structures?  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify the design or operation of the cooling tower that will change water or air flow characteristics?  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify the design or operation of the plant that will change the path of an existing water discharge or that will result in a new water discharge?   |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Modify existing stationary fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)?  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve the installation of stationary fuel burning equipment or use of portable fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)?                            |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve the installation or use of equipment that will result in an air emission discharge?  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve the installation or modification of a stationary or mobile tank?   |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve the use or storage of oils or chemicals?   |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Involve burial or placement of any solid wastes in the site area that may effect runoff, surface water, or groundwater?  |

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#### IV. 50.59 EVALUATION EXEMPTION

**Enter this section only if a “yes” box was checked in either Section II.A or II.B, above.**

**A. Check the applicable boxes below. If any of the boxes are checked, a 50.59 Evaluation is not required. If none of the boxes are checked, perform a 50.59 Evaluation in accordance with Section V. Provide supporting documentation or references as appropriate.**

- ☐ The proposed activity is editorial/typographical as defined in Section 5.4.1.
- ☐ The proposed activity represents an “FSAR-only” change as allowed in Section 5.4.2\_\_\_\_\_. (Insert item # from Section 5.4.2).
- ☐ The proposed activity impacts design function as described in Section 5.4.3 as follows:
  - The proposed activity does not adversely affect the design function of an SSC as described in the FSAR; **AND**
  - The proposed activity does not adversely affect a method of performing or controlling a design function of an SSC as described in the FSAR; **AND**
  - The proposed activity does not adversely affect an evaluation that demonstrates intended functions of an SSC described in the FSAR will be accomplished.
- ☐ The proposed activity or portions thereof, is controlled by another regulation instead of 50.59 per Section 5.4.4. (Portions of the change not controlled under the other program must be evaluated under 50.59.)
- ☐ An approved, valid 50.59 Review(s) covering associated aspects of the proposed change already exists per Section 5.4.5. Reference 50.59 Evaluation # \_\_\_\_\_ (if applicable) or attach documentation. Verify the previous 50.59 Review remains valid.
- ☐ The proposed activity, in its entirety, has been approved by the NRC per Section 5.4.6.  
Reference: \_\_\_\_\_

### B. Basis

(Provide an adequate basis for determining the proposed activity may be exempted such that a third-party reviewer can reach the same conclusions.)

[illegible]



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10CFR50.54(q) Screening

## 1. DOCUMENT INFORMATION

Procedure/Document Number: 01-s-10-4	Proc./Doc. Revision: 10
Document Title: Emergency Preparedness Drills and Exercises	
Brief Description of Proposed Revision: Add requirement for Controllers/Evaluators to be present in their assigned facility at least 30 minutes prior to activation of their assigned facility. Title changes to reflect UFSAR change. Grammatical changes. Adds requirement for personnel assigned as Controllers or Evaluators to attend Controller/Evaluator Training prior to performing in these roles for the first time and annually if they continue to perform in the Controller/Evaluator role.	

## 2. SCREENING

A.) Does the proposed revision require a change to the Emergency Plan? ___ Yes ___ <b>x</b> ___ No
B.) Does the proposed revision change the site Emergency Action Levels (EALs)? ___ Yes ___ <b>x</b> ___ No
If the answer to either question is YES, then a 50.54(q) evaluation must be performed.

## 3. APPROVAL

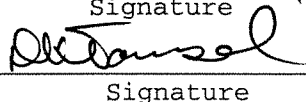
Screening Completed By:

  
Signature

12/3/2001

Date

Screening Reviewed By:

  
Signature

12/3/2001

Date

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**RPTS FORM**

<b>10CFR50.59 Review Required?</b>	<input checked="" type="checkbox"/> Yes	If Yes, attach 50.59 Review Form
	<input type="checkbox"/> No	Not required per LI-101

<b>Cross-Discipline review required?</b>	<input type="checkbox"/> Yes	(Note affected Departments Below)
	<input checked="" type="checkbox"/> No	
<b>Preparer Initials&gt;&gt;&gt;</b>	<b>LS</b>	

<b>Department Cross-Discipline Reviews Needed</b>	<b>Signoff</b> (signed, electronic, telcon)

Does this directive contain Tech Spec Triggers? ☐ YES ☒ NO

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**REQUIREMENTS CROSS-REFERENCE LIST**

Requirement Implemented	by Directive	Directive Paragraph Number
Name	Paragraph Number	That Implements Requirement
GGNS Emer Plan	8.3.1.S2.a, f & S3	6.1.2.e
GGNS Emer Plan	8.3.S1	5.3.S1 & 5.4.S1
GGNS Emer Plan	8.3.S6, S7, S8	5.3, 6.1.2 (Note)
GGNS Emer Plan	8.3.S3 & S4	5.4.S1 & S2
GGNS Emer Plan	8.3.S5	5.5
GGNS Emer Plan	8.3.1.S7	5.8
GGNS Emer Plan	8.3.1.S1	6.1.6
GGNS Emer Plan	8.3.2.S1	Attachment II
UFSAR	9.5.2.3.S3	Attachment II
10CFR50	App E, Sec IV, E.9.d	Attachment II
GGNS Emer Plan	8.3.1.S5 & S6	6.1.3.a.(3), (8) & (9)
GGNS Emer Plan	8.3.1.S2.d	6.1.4.a
GGNS Emer Plan	8.3.1.S2.e	2.1.3
UFSAR	9B.2.1.7	2.3/Attachment II
GGNS Emer Plan	8.4.S1(D)	2.1
GGNS Emer Plan	8.5.S16	6.1.5.a.3
GNRO-97/00080	50-416/9709-1 Item 2	6.1.2.f
GNRO-97/00113	97-15-01.Item 3	6.1.2.g
CR-GLO-2001-0007	CA2	6.1.2.h
CR-2001-1197	CA2	6.1.2.i

\* Covered by directive as a whole or by various paragraphs of the directive.

NOTE

The Component Database Change Request statement is applicable only to Volume 06 and 07 maintenance directives.

Component Database Change Request generated and the backup documentation available for setpoint and/or calibration data only ☐ Yes ☒ N/A CDBCR # \_\_\_\_\_

Current Revision Statement

Revision 9:

- Adds requirement that Controllers and Evaluators be present in their assigned facilities at least 30 prior to activation of the facility unless otherwise directed.
- Changes titles to reflect current UFSAR.
- Grammatical changes
- Personnel assigned as Controllers or Evaluators must attend Controller/Evaluator Training prior to performing in these roles for the first time and annually if they continue to perform in the Controller/Evaluator role.

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## 1.0 PURPOSE AND DISCUSSION

### 1.1 To describe:

- 1.1.1 Type and frequency of drills and exercises.
- 1.1.2 Procedure for conducting a drill or exercise.
- 1.1.3 Method of management review and approval of exercise.

### 1.2 Discussion

- 1.2.1 Drills and exercises are conducted to ensure that the entire Emergency Organization maintains a high degree of readiness.

## 2.0 RESPONSIBILITIES

### 2.1 Manager, Emergency Preparedness - Is responsible for:

- 2.1.1 Developing and preparing scenarios and conducting drills/exercises with exception of Attachment II, Section 4.4; and 2.2 ensuring that drills and exercises are consistent with NRC requirements.
- 2.1.2 Management review and approval to conduct an exercise.
- 2.1.3 Using results from the critique to help formulate changes to training, Emergency Plan Procedures, Emergency Plan equipment, administration, or plant directives, as necessary.
- 2.1.4 Ensuring that drill Scenarios, when not a portion of an exercise or limited exercise, are prepared by the individual responsible for conducting the drill.
- 2.1.5 The following activities related to exercises or drills involving the Emergency Response Organization and offsite support agencies:
  - a. Scope
  - b. Scheduling
  - c. Scenario preparation
  - d. Conduct
  - e. Report preparation
  - f. Preparing documentation submitted to the NRC (exercises only)
- 2.1.6 Coordinating with plant for drills, limited exercises or exercises which may involve plant staff.
- 2.1.7 Defining the scope, scheduling, report preparation, and conduct of drills and exercises specified in Attachment II.
- 2.1.8 Submitting objectives of the NRC Graded Exercise and copies of complete exercise scenarios to the NRC 90 and 60 days respectively before the exercise, if requested.

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- 2.1.9 Submitting objectives and appropriate scenario information to the participating state agencies as requested.
- 2.1.10 Selecting the Exercise Controller Team members and making controller/evaluator assignments.
- 2.1.11 Coordinating with the responsible federal, state and local agency representatives, as necessary, regarding the scheduling of exercise events.
- 2.2 Manager, Operations - Has the following responsibilities:
  - 2.2.1 Approving scheduled date and time of exercise to reduce the impact on plant operations or major evolutions.
  - 2.2.2 Approval of exercise scenario. If the Manager, Operations is to be a participant in a exercise, then he selects another manager or Operations Superintendent to approve the scenario.
- 2.3 Fire Protection Trainer - Is responsible for developing, conducting and documenting participation in Fire Brigade Drills in accordance with Training Section Procedures. The Claiborne County Fire Department will be invited to participate in annual Fire Brigade Drills.
- 2.4 Facility Process Owner responsibilities:
  - 2.4.1 Ensure personnel assigned as Emergency Personnel meet all Emergency Personnel qualification requirements.
- 2.5 Scenario Preparation Team (SPT) - Is responsible for defining and preparing the scenario and the supporting information required to conduct the biennial exercise. The SPT is chaired by the Manager, Emergency Preparedness or designee and is composed of knowledgeable personnel appointed from within GGNS (recommended by appropriate department managers at the Chairman's request), or from outside contractors approved by the Chairman. The Manager, Emergency Preparedness also requests personnel from participating state/local agencies.
  - 2.5.1 The team may include members with the following expertise:
    - a. Emergency Preparedness (including Offsite Agency response)
    - b. Plant Operations
    - c. Dose Assessment
    - d. Radiation Control/Chemistry
    - e. Environmental Monitoring/Sampling
    - f. Plant Design and Safety/Transient Analysis

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## 2.5.1 (Cont.)

## g. Public Information

NOTE

The Offsite Agency response expertise is usually provided by the SPT representative from offsite participants (e.g., Mississippi and/or Louisiana).

## 2.5.2 The scenario prepared by the SPT may include, but is not limited to, the following information:

- a. Schedule of Events (date, time period, participating organizations and locations)
- b. Objectives/Actions to be Tested
- c. Brief Narrative Summary of Events
- d. Premise, Assumptions, and Discontinuities
- e. Initial Conditions (general and specific)
- f. Timetable for Emergency Classifications
- g. Sequence of Events
- h. Exercise Trigger Points
- i. Radiological Release Data Summary
- j. Dose Calculations
- k. Offsite Radiological Release Data
- l. Grab Sample Offsite Air Sampling Data
- m. Post- Accident In- Plant Radiation Zones
- n. Incoming Telephone Calls (Planned)
- o. Exercise Messages
- p. Plant Status Indicators

## 2.5.3 Distribution of scenario document is controlled by the Manager, Emergency Preparedness.

2.6 The Exercise Controller Team - Is responsible for conducting the exercise. It may consist of, but is not limited to, SPT members and/or personnel from various GGNS departments, other utilities, or outside contractors, Etc.

2.7 The Exercise Evaluation Team - Is responsible for critiquing the exercise. It may consist of, but is not limited to, SPT members and/or personnel from various GGNS Departments, other utilities or outside contractors, Etc.

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### 3.0 REFERENCES

- 3.1 NUREG- 0654, Revision 1
- 3.2 GGNS Emergency Plan
- 3.3 Administrative Procedure 01-S-04-21, Emergency Preparedness Training Program
- 3.4 44 CFR 350

### 4.0 ATTACHMENTS

- 4.1 Attachment I - Drill/Exercise Participant Comment Sheet
- 4.2 Attachment II - Required Drills and Exercises
- 4.3 Attachment III - Drill/Exercise Preparation Checklist

### 5.0 DEFINITIONS

- 5.1 Controller - An individual who provides inputs or cues intended to trigger actions. A controller may prevent actions by the participants that, if left unchecked, would disrupt or significantly alter the course of the scenario resulting in insufficient testing of drill or exercise objectives. Individuals appointed as controllers should be familiar with plant systems, layout, procedure, and general site area.
- 5.2 Observer - An individual assigned to observe particular aspects of a drill or exercise. These individuals normally do not provide information or disrupt actions of participants during the drill.
- 5.3 Drill - An Emergency Response instruction period conducted to test, develop, and maintain Emergency Response skills. A drill may be a component of an exercise or limited exercise.
- 5.4 Exercise - An event conducted to test the integrated capability and a major portion of the basic elements existing within site, state and local agency emergency preparedness plans and organizations. An exercise simulates an emergency resulting in potential or actual offsite radiological releases that would require response by offsite authorities.
- 5.5 Limited Exercise - Is an event that has limited objectives and tests one or specific portions of the basic elements existing within emergency preparedness plans and organizations. A limited exercise usually consists of a training or practice exercise in preparation for conducting the biennial NRC critiqued exercise and may include the response of offsite agencies.



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- 5.6 Emergency Response Personnel - Personnel who are required to respond to an emergency and meet the necessary qualification requirements. Personnel responding to Emergency Organization Positions at GGNS must complete the training requirements in accordance with 01-S-04-21.
- 5.7 Emergency Organization Position - Functional titles listed in the Emergency Plan Procedure 01-S-10-6, with training requirements listed in Administrative Procedure 01-S-04-21 and usually filled by qualified site personnel during an emergency at GGNS.
- 5.8 Scenario - A scenario contains but is not limited to:
- 5.8.1 Basic objectives and appropriate evaluation criteria
  - 5.8.2 Dates, locations, and organizations expected to participate
  - 5.8.3 List of simulated events
  - 5.8.4 Time schedule (real and simulated)
  - 5.8.5 Narrative summaries including information such as simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, public information activities, etc.
  - 5.8.6 Observer assignments and advance materials consisting of the scenario, evaluation criteria performance objectives and observer checksheets
- 5.9 TSC - Technical Support Center
- 5.10 ENS - Emergency Notification System
- 5.11 SPT - Scenario Preparation Team
- 5.12 Evaluator - An individual who observes and critiques the actions of Exercise Team Members and Controllers based on exercise objectives.
- 5.13 Off Hours - Occurring after 6:00 p.m. and not later than 4:00 a.m.
- 5.14 Biennial - Occurring every two years.

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## 6.0 DETAILS

### 6.1 Drills and Exercises

#### NOTE

Exercises and Limited Exercises are based on preplanned scenarios with observers assigned to various locations to monitor actions of emergency organization personnel.

#### 6.1.1 Precautions and Limitations

- a. Announcements over the PA systems or notifications to any local or state agencies and/or radio communications associated with the drill or exercise should be preceded by the words, "THIS IS A DRILL, THIS IS A DRILL."

- (1) Personnel should also be notified over the PA system when a drill or exercise is terminated.

#### NOTE

Periodic announcements concerning the drill should be made over the PA systems to ensure personnel awareness that a drill or exercise is in progress and/or conditions have changed.

- b. If a drill/exercise is in progress and an actual emergency or casualty situation arises, the drill/exercise is terminated immediately and the appropriate announcements are made stressing that an actual emergency or casualty situation exists.
- c. The exercise participants are not to have prior knowledge of the specific exercise scenarios. The actual details of the exercise scenarios are kept confidential.

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6.1.2 Drill, Exercise General RequirementsNOTE

On-the-spot correction of performance errors is allowed in drills only.

Drills may be used to conduct required plant surveillances and operations, if the activities are coordinated in advance with the drill controller.

- a. Drills/exercises are the responsibility of personnel listed in Attachment II.
- b. Drills/exercises shall be conducted to meet the objectives listed in Attachment II.
- c. Drills/exercises shall be scheduled and conducted at the frequency outlined in Attachment II.
- d. Identification badges are used during the exercise to distinguish controllers, Evaluators and participants of the emergency organization being tested.
- e. The sequence of events normally followed for drills/exercises is:
  - (1) Prepare the scenarios and review them with key officials of participating organizations (the actual details of exercise scenarios are kept confidential).
  - (2) Assign and brief observers - qualified observers from the utility, state/local government as well as observers from the NRC, FEMA, and the Regional Assistance Committee
  - (3) Conduct the drill/exercise
  - (4) Critique the drill/exercise as soon as practicable after it is conducted
  - (5) Make necessary changes as a result of the critique review, and;
  - (6) Provide documentation to the Director, Nuclear Safety Assurance, the Manager, Emergency Preparedness, and Site Vice President.
- f. Scheduled Exercises, and drill scenarios, where appropriate, shall provide for response by on shift Radiological Assessment personnel. When provided for in a scheduled drill or Exercise, the on shift Radiological Assessment personnel shall participate.

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## 6.1.2 (Cont.)

- g. To more realistically simulate the use of SCBA's face pieces will not be reused during drills and exercises. The depletion of SCBA face pieces shall be demonstrated by response teams simulating their disposal at the point of removal.
- h. Controllers and Evaluators should be present in their assigned facility at least 30 minutes prior to activation of the assigned facility unless directed otherwise by the Lead Controller/Lead Evaluator for that facility.
- i. Personnel assigned as Controllers or Evaluators must attend Controller/Evaluator Training prior to performing in these roles for the first time and annually if they continue to perform in the Controller/Evaluator role.

6.1.3 Emergency Exercise

- a. A major exercise conducted, completed and documented as part of the NRC Biennial Exercise that includes the following:
  - (1) Involves participation of offsite emergency support personnel within the local and state emergency organizations.
  - (2) Normally involves all or part of Emergency Response organizations.
  - (3) The degree of offsite participation is subject to requirements of 44CFR350.
  - (4) This exercise simulates emergency conditions requiring the declaration of a Site Area or General Emergency.
  - (5) Once every six years, a joint exercise equal to a Site Area or General Emergency that involves federal, state, and local emergency response personnel, organizations, and agencies is conducted.
  - (6) The scope of the exercise tests as much of the Emergency Plan (i.e., GGNS, state, and local) as reasonably achievable.
  - (7) The degree of public participation in this exercise is determined by the appropriate state agencies.
  - (8) Provisions are made to start an exercise between 6 p.m. and 4 a.m. once every six years.
  - (9) The scenarios are varied from year to year; operations in various weather conditions may be exercised or simulated; some of the exercises are unannounced.
  - (10) Provisions to test the depletion of protective equipment and supplies.

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#### 6.1.4 Critique

- a. The Evaluators critique the drill/exercise as soon as possible after its termination as follows:
  - (1) Each Evaluator gives a brief report pointing out any significant deficiencies in procedures, equipment, or training that they observe.
  - (2) Add the names of key participants and their roles to the Observation/Comment Sheet or equivalent.
  - (3) Record any observation/comments on the Drill Observation/Comment Sheet (Attachment I) or equivalent.
  - (4) Turn in all observations/comment sheets to the Manager, Emergency Preparedness.
- b. Any drill participant who wishes to do so may provide comments to the Evaluator to be included in the critique or fill out a drill Observation/Comment Sheet and provide it to the Manager, Emergency Preparedness.

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#### 6.1.5 Reports and Review

##### a. Drills/Exercises

- (1) An annual drill/exercise schedule is maintained by the Manager, Emergency Preparedness to ensure all drills/exercises are completed as required.
  - (2) It is the responsibility of the individual conducting the drill/exercise to prepare a report of the drill/exercise. If drill/exercise reports are prepared by individuals other than the Manager, Emergency Preparedness or designee, they are submitted to the Manager, Emergency Preparedness or designee within 30 days following completion of the drill/exercise.
  - (3) Manager, Emergency Preparedness submits the NRC Graded Exercise Report to the Site Vice President, and the Director, Nuclear Safety Assurance within 45 days following completion of the exercise.
  - (4) Drill/exercise reports submitted are reviewed by the Manager, Emergency Preparedness or designee and a copy is transmitted to Nuclear Records.
  - (5) The following items are included in the reports of drills/exercises:
    - (a) Objectives accomplished and actions tested.
    - (b) Results of the drill/exercise.
    - (c) Comments/observations or recommendations generated from drill/exercise.
  - (6) Manager, Emergency Preparedness ensures that items identified for corrective action are tracked in accordance with 01-S-10-3.
  - (7) Provide the results of Emergency Plan drills which involve outside agencies and full plant staff participation to the On-Site Safety Review Committee (OSRC) for review.
- b. The Fire Protection Trainer must send a memo to the Manager, Emergency Preparedness that provides documentation that indicates completion of quarterly and annual fire brigade drills, for incorporation into file.

#### 6.1.6 Drill and Exercise Scenario Approval

- a. All graded exercise, site medical drill, quarterly EP Drill and Post Accident Sampling System Drill scenarios are approved by the Manager, Operations.
- b. Fire Brigade Drill scenarios are approved by the Fire Protection Trainer.
- c. All other drill scenarios are approved by the Manager, Emergency Preparedness.

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**DRILL/EXERCISE PARTICIPANT COMMENT SHEET**

DRILL/EXERCISE: \_\_\_\_\_

NAME: \_\_\_\_\_ DATE: \_\_\_\_\_

EMERGENCY POSITION: \_\_\_\_\_ EXT. \_\_\_\_\_

FACILITY: \_\_\_\_\_

WRITTEN RESPONSE REQUESTED? YES \_\_\_\_\_ NO \_\_\_\_\_

AREA(S) AFFECTED: (Place a check mark next to the affected area(s))

Facility \_\_\_\_\_ Personnel \_\_\_\_\_ Equipment \_\_\_\_\_

Procedure \_\_\_\_\_ Scenario \_\_\_\_\_

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_EMERGENCY PREPAREDNESS RESPONSE: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

EMERGENCY PREPAREDNESS RESPONDER: \_\_\_\_\_

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REQUIRED DRILLS AND EXERCISES

<u>FREQUENCY</u>	<u>DRILL/EXERCISE</u>		<u>OBJECTIVES</u>	<u>RESPONSIBILITY</u>
1.0 Monthly	1.1 Communications Drill	1.1.1	Test primary and backup communications with State and local governments within the ten- mile EPZ	Manager, Emergency Preparedness
		1.1.2	Test ability of organization involved to receive and understand a message	
		1.1.3	Test Communications between NRC and Control Room, Technical Support Center, and Emergency Operations Facility	
2.0 Quarterly	2.1 Communications Drill	2.1.1	Test primary and backup communications with federal and state emergency response organization within the 50- mile EPZ	Manager, Emergency Preparedness
		2.1.2	Test ability of organization involved to receive and understand a simulated emergency message	
	2.2 Fire Brigade Drill	2.2.1	Test effectiveness of Fire Brigade Members	Fire Protection Coordinator
		2.2.2	Test effectiveness of fire fighting equipment	
		2.2.3	Test effectiveness of communications used for fire fighting	



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REQUIRED DRILLS AND EXERCISES

<u>FREQUENCY</u>	<u>DRILL/EXERCISE</u>		<u>OBJECTIVES</u>	<u>RESPONSIBILITY</u>
3.0 Semi-Annual	3.1 Health Physics Drill	3.1.1	Health Physics personnel to respond to simulated radiation emergency	Manager, Emergency Preparedness
		3.1.2	Test effectiveness of equipment used for sampling and analysis of gaseous samples, liquid samples and direct radiation	
		3.1.3	Test overall capability to respond to and analyze simulated elevated airborne and liquid samples and direct radiation measurements	
		3.1.4	Test the integrated capability of site, state and local radiological monitoring personnel, as appropriate	
4.0 Annual	4.1 Radiological Monitoring Drill (onsite and offsite)	4.1.1	Test effectiveness of radiological and environmental monitoring personnel to respond to simulated releases of radioactivity	Manager, Emergency Preparedness
		4.1.2	Test ability of radiological and environmental monitoring personnel to sample and analyze all sample media (e.g., water, vegetation, soil and air)	

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REQUIRED DRILLS AND EXERCISES

<u>FREQUENCY</u>	<u>DRILL/EXERCISE</u>	<u>OBJECTIVES</u>	<u>RESPONSIBILITY</u>
		4.1.3 Test effectiveness of equipment used for sampling and analysis	
		4.1.4 Test communication and record keeping techniques used for radiological and environmental sampling	
		4.1.5 Test the integrated capabilities to respond to simulated radiological conditions by site, state and local emergency response organizations	
4.0 Annual	4.2 Emergency Repair Team Drill	4.2.1 Test the ability of Emergency Repair Team members to respond and implement damage control techniques	Manager, Emergency Preparedness
		4.2.2 Test the effectiveness of equipment used for damage control	
		4.2.3 Test the effectiveness of Emergency Repair Team members	
		4.2.4 Test the communications used by the Emergency Repair Team	

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REQUIRED DRILLS AND EXERCISES

<u>FREQUENCY</u>	<u>DRILL/EXERCISE</u>	<u>OBJECTIVES</u>	<u>RESPONSIBILITY</u>
4.0 Annual	4.3 Medical Emergency Drill	4.3.1 Test the effectiveness of first aid and Health Physics personnel to respond to and treat contaminated injured personnel	Manager, Emergency Preparedness
		4.3.2 Test the ability to request offsite assistance, including the communications used	
		4.3.3 Test the ability of offsite medical treatment facilities and support services (e.g., ambulance services) to respond to a request for assistance and the timeliness of the offsite response	
		4.3.4 Test the effectiveness of offsite medical treatment facilities and support services to treat contaminated injured personnel	
4.0 Annual	4.4 Fire Brigade Drill with Local Fire Department	4.4.1 Test the ability of the Fire Brigade to request offsite assistance including the communications used	Fire Protection Coordinator
		4.4.2 Determine the effectiveness of the local fire department to respond to fires on the site and the timeliness of the offsite response	

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REQUIRED DRILLS AND EXERCISES

<u>FREQUENCY</u>	<u>DRILL/EXERCISE</u>	<u>OBJECTIVES</u>	<u>RESPONSIBILITY</u>
4.0 Annual	4.5 Post- Accident Sampling	4.4.3 Determine the compatibility of plant and local fire department equipment for fighting fires	Manager, Emergency Preparedness
		4.5.1 Test the effectiveness of plant Chemistry personnel in sampling and analyzing a liquid sample with actual elevated radiation levels using the Post-Accident Sampling System (PASS)	
		4.5.2 Evaluate plant Chemistry personnel's use of procedures to obtain and analyze a liquid sample with the PASS	
4.0 Biennial	4.6 Exercise	4.5.3 Evaluate the effectiveness of sampling procedures and techniques for use of the PASS	Manager, Emergency Preparedness
		4.6.1 Test the integrated capability and a major portion of the basic elements existing with EOI, state and local emergency response plans and organizations.	
		4.6.2 Evaluate site emergency response organization on the (simulation) of the use and control of respiratory protection equipment.	

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REQUIRED DRILLS AND EXERCISES

<u>FREQUENCY</u>	<u>DRILL/EXERCISE</u>	<u>OBJECTIVES</u>	<u>RESPONSIBILITY</u>
		4.6.3 Test the effectiveness of members of the site, state and local emergency response organization to respond to simulated offsite radiological releases which would require a response by offsite agencies	
5.0 5- Year	5.1 Exercise	5.1.1 Test the effectiveness of federal emergency response organizations to respond to a simulated offsite radiological release.	Manager, Emergency Preparedness
6.0 6- Year	6.1 Backup Facilities Drills	6.1.1 Test the Backup Emergency Operations Facility	Manager, Emergency Preparedness
		6.1.2 Test the Backup Technical Support Center	
		6.1.3 Test the Backup Operations Support Center	
		6.1.4 Test the Backup ENMC/EIC	
	6.2 Off Hours Drill	6.2.1 Test the effectiveness of site, state, and local emergency response organization to respond to off hours staffing drill.	Manager, Emergency Preparedness
	6.3 Exercise	6.3.1 Test the effectiveness of the site, state, and local emergency response organization to respond to simulated ingestion exposure pathway.	Manager, Emergency Preparedness
	6.4 ENMC/EIC Activation	6.4.1 Test the effectiveness of the site emergency response organization to activate the Emergency News Media Center.	Manager, Emergency Preparedness
		6.4.2 Test the ability of the site, state, and local emergency response organizations to disseminate information correctly and timely to the public.	

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- |  |                                      |  |                                       |
|--|--------------------------------------|--|---------------------------------------|
| 6.5 Unannounced Drill                      | 6.5.1                                | Evaluate the effectiveness of the emergency response organization to perform a combination of the principal functional areas, such as, management and coordination of emergency response, accident assessment, protective action decision making, and plant system repair and corrective actions, by a method that precludes prior responder's knowledge of the exact schedule of the drill. | Manager,<br>Emergency<br>Preparedness |
| 6.6 Augmentation Drill                     | 6.6.1                                | Evaluate the response capability of the emergency response organization by a method that precludes any prior responder's knowledge of the drill schedule.  | Manager,<br>Emergency<br>Preparedness |
| 7.0 Periodically<br>(Between<br>Exercises) | 7.1 Radiation<br>Emergency<br>Drills | 7.1.1  | Manager,<br>Emergency<br>Preparedness |
|  |                                      | 7.1.2  |                                       |
|  |                                      | 7.1.3  |                                       |

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GGNS EMERGENCY PREPAREDNESS  
DRILL/EXERCISE PREPARATION CHECKLIST

ACTIVITY	DUE DATE	DOR	COMPLETE
<b>PRE DRILL ACTIVITIES</b>			
ESTABLISH DRILL DATE			
RESERVE SIMULATOR			
NOTIFY MANAGEMENT OF DRILL DATE			
DETERMINE OFFSITE PARTICIPATION			
PERFORM SCENARIO VALIDATION			
RESERVE ENMC AUDITORIUM			
COMPLETE SCENARIO			
MANAGEMENT APPROVAL OF SCENARIO			
ISSUE EP HOTLINE WITH DRILL SCHEDULE			
MAKE CONTROLLER ASSIGNMENTS			
COORDINATE OBSERVERS			
ARRANGE FOR TELEPHONE CREW			
ARRANGE FOR MOCK MEDIA			
ARRANGE FOR OPS CREW			
ARRANGE FOR CHEMIST			
ARRANGE FOR OPS COMMUNICATORS AND OSC OPERATORS			
ARRANGE FOR CONTROLLER IN CONTROL ROOM			
ARRANGE FOR DRILL MEALS			
DISTRIBUTE SCENARIO PACKAGES			
RESERVE PLANT RADIO CHANNEL			
CONTROLLER/EVALUATOR BRIEF/TRAINING			
VIP DRILL PASSWORD/INSTRUCTIONS TO SIMULATOR CONTROLLED			
VIP-2000 DRILL PASSWORD/INSTRUCTION TO TSO CONTROLLER			
DRILL PASSWORD IN VIP-2000			
PREPARE DRILL NOTIFICATION FORMS			
ISSUE EVALUATOR/CONTROLLER/OBSERVER/COACHES BADGES			
OSC TABLETOP			
EOF TABLETOP			
ENMC/EIC TABLETOP			
TSC TABLETOP			
VERIFY SIMULATOR TO PLANT RADIO CHANNEL MATCH			
PRE-DRILL EP HOTLINE FOR RADIO CHANNEL			
<b>SIMULATOR</b>			
INSTALL THE DRILL OHL TELEPHONE IN SIMULATOR			
INSTALL ENS TELEPHONE			
SELECT RADIO TO CORRECT CHANGE			
PLACE DOSE CAL COMPUTERS IN DRILL MODE			
CONNECT ERF HEADSETS FOR SIMULATOR			
INSTALL BATTERIES IN CONTROLLED HEADSETS			
CHECK CONTROLLED HEADSET TO FOR OPERABILITY			
PLACE DRILL FORMS IN THE SIMULATOR			
<b>TSC</b>			
OPEN THE TSC DOOR			
REPROGRAM TELEPHONES FOR SRAO AND SHIFT MANAGER			
REBOOT THE TSC PDS/SPD AND LOGIN TO SIMULATOR			
CHECK CONTROLLED HEADSET FOR OPERABILITY			
INSTALL BATTERIES IN CONTROLLER HEADSETS			
PLACE DRILL FORMS IN TSC			

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GGNS EMERGENCY PREPAREDNESS  
DRILL/EXERCISE PREPARATION CHECKLIST

ACTIVITY	DUE DATE	DOR	COMPLETE
<b>EOF</b>			
REPROGRAM TELEPHONES FOR SRAO AND SHIFT MANAGER			
CHECK CONTROLLER HEADSET FOR OPERABILITY			
INSTALL BATTERIES IN CONTROLLER HEADSETS			
CHECK CONTROLLER HEADSET FOR OPERABILITY			
REPROGRAM TELEPHONES FOR SRAO AND SHIFT MANAGER			
REBOOT THE EOF SPDS/PDS TERMINALS AND LOAD SIMULATOR			
<b>OSC</b>			
CHECK EMERGENCY RWP			
REPLACE BATTERY IN CONTROLLER HEADSET			
CHECK CONTROLLER HEADSET FOR OPERABILITY			
SETUP SCBA COLLECTION AREA			
CHECK PLANT PAGER			
CHECK RADIOS			
PLACE STICKERS FOR SCBAS IN OSC HP AREA			
CONDUCT DRILL			
PERFORM FACILITY CRITIQUE			
<b>SIMULATOR</b>			
REMOVE VIP-2000 DRILL PASSWORD/INSTRUCTIONS FROM SIMULATOR			
REMOVE THE DRILL OHL TELEPHONE IN SIMULATOR			
REMOVE ENS TELEPHONE			
DISCONNECT ERF HEADSETS FOR SIMULATOR			
<b>TSC</b>			
REMOVE VIP-2000 DRILL PASSWORD/INSTRUCTIONS FOR TSC			
REPROGRAM TELEPHONES FOR SRAO AND SHIFT MANAGER			
REBOOT THE TSC PDS/SPDS			
REMOVE DRILL FORMS IN TSC			
<b>EOF</b>			
REPROGRAM TELEPHONES FOR SRAO AND SHIFT MANAGER			
CHECK CONTROLLED HEADSET FOR OPERABILITY			
REBOOT THE EOF SPDS/PDS TERMINALS			
REPLACE INSTRUMENTS AND DOSIMETRY IN EOF DECON AREA			
<b>OSC</b>			
PLACE SCBAS AND MASKS IN STORAGE AREA			
CHECK RADIOS			
REMOVE STICKERS FOR SCBAS IN OSC HP AREA			
<b>POST DRILL ACTIVITIES</b>			
COLLECT ALL DRILL MATERIAL AND ASSOCIATED PAPERWORK			
REMOVE DRILL PASSWORD FROM VIP-2000			
PERFORM EVALUATOR/CONTROLLER CRITIQUE MEETING			
SUBMIT PARTICIPANTS ROSTERS TO TRAINING RECORDS			
EP HOTLINE FOR FACILITY DEBRIEF			
EOF PARTICIPANTS DEBRIEF			
ENMC PARTICIPANTS DEBRIEF			
TSO PARTICIPANTS DEBRIEF			
OSC PARTICIPANTS DEBRIEF			
PERFORM INVENTORY AND INSPECTION OF FACILITIES			
PREPARE DRILL REPORT			