

DATE: 04/28/03
TIME: 14:08:08

AMEREN/UE
DOCUMENT CONTROL SYSTEM
DOCUMENT TRANSMITTAL

PAGE: 29
ARDC8801

TRANSMITTAL NUMBER: 506471
TO CONTROL NUMBER: 338U
TITLE: OTHER
DEPT: NUCLEAR REGULATORY COMM.
LOCATION: USNRC - WASH DC
TRANSMITTAL DATE: 20030428

RETURN ACKNOWLEDGED TRANSMITTAL AND
SUPERSEDED DOCUMENTS (IF APPLICABLE) TO:
ADMINISTRATION RECORDS
AMEREN/UE
CALLAWAY PLANT
P.O. BOX 620
FULTON, MO 65251

TRAN	DOC			RET		ALT	ALT	
CODE	TYPE	DOCUMENT	NUMBER	REV	REV	MED	COPY	AFFECTED DOCUMENT
R	PROC	EIP-ZZ-A0001		006	005	C	1	
A	PROC	EIP-ZZ-A0001	APP1	000		C	1	

ACKNOWLEDGED BY:

DATE:

A045

CALLAWAY PLANT
EMERGENCY PLAN IMPLEMENTING PROCEDURE

EIP-ZZ-A0001

EMERGENCY RESPONSE ORGANIZATION

RESPONSIBLE DEPARTMENT Emergency Preparedness

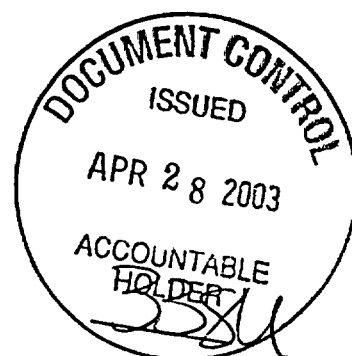
PROCEDURE OWNER D.R. Lewis

WRITTEN BY D. R. Lewis

PREPARED BY D. R. Lewis

APPROVED BY SSadby

DATE ISSUED 4-28-03



This procedure contains the following:

Pages	<u>1</u>	through	<u>8</u>
Attachments	<u>1</u>	through	<u>1</u>
Tables	<u> </u>	through	<u> </u>
Figures	<u> </u>	through	<u> </u>
Appendices	<u>1</u>	through	<u>1</u>
Checkoff Lists	<u> </u>	through	<u> </u>

This procedure has checkoff list(s) maintained in the mainframe computer.

Conversion of commitments to TRS reference/hidden text completed by Revision Number:

Non-T/S Commitments 003

TABLE OF CONTENTS

<u>Section</u>		<u>Page Number</u>
1	PURPOSE AND SCOPE	1
2	DEFINITIONS	1
3	RESPONSIBILITIES	2
4	PROCEDURE	6
5	REFERENCES	8
6	RECORDS	8
Attachment 1	Emergency Response Organization Maintenance Form, CA-#2448	1 Page
Appendix 1	Departmental/ERO Position Ownership Listing	2 Pages

EMERGENCY RESPONSE ORGANIZATION

1 PURPOSE AND SCOPE

- 1.1 This procedure defines the activities necessary to maintain the Emergency Response Organization (ERO). Additionally it identifies the expectations of Callaway Plant personnel to support the adequate staffing of the ERO.

2 DEFINITIONS

- 2.1 **Emergency Response Organization (ERO) Position Owner** – Department Head or individual selected by the Dept Head to be responsible for identifying individuals to be trained, qualified and staff the (ERO) positions for which the department is responsible.
- 2.2 **Emergency Response Personnel** – Personnel designated, trained, qualified, and assigned to fill specific Emergency Response Organization (ERO) positions. They staff the Emergency Response Facilities to make them capable of fulfilling all intended emergency functions. Emergency Response Personnel may be duty responders, non-duty responders or as needed responders.
- 2.3 **“As Needed” Personnel** – Some Emergency Response Personnel are identified as “as needed” on Table 5 of the Radiological Emergency Response Plan (RERP). “As Needed” responders are notified to respond by manual callout as requested by their respective coordinator or supervisor.
- 2.4 **Duty Responders** – Emergency Response Personnel are assigned for rotating on-call coverage. They are scheduled for duty around the clock to ensure adequate response during off normal working hours. When on duty, they remain fit for duty, maintain their pager within hearing distance, and remain within the identified response time goal from their Emergency Response Facility.
- In the event of an actual emergency, Duty Responders that are not on duty, but fit for duty and able to respond are also required to respond as Non Duty Responders.
- 2.5 **Non-Duty Responders** – Emergency Response Personnel that are not on a duty schedule but are expected to respond at all times to emergency or drill pages, if fit-for-duty, and within the response goal times. These are also referred to “pool” positions.

- 2.6 **Rapid Responders** – Pre-designated Duty Responders assigned to positions to relieve the On-shift personnel of emergency functions not directly related to operation of the Plant.
- 2.7 **Emergency Response Organization** - An organization that has been established to provide managerial, technical and logistical support in the event of a radiological emergency declaration at the Callaway Plant. This organization is structured to provide control and coordination of on-site response, coordination of off-site response and dissemination of information to the public.
- 2.8 **Emergency Response Organization Staffing Levels** – The desired or optimum staffing level for the Emergency Response Organization is to maintain six (6) individuals qualified in each emergency response position identified in the RERP, chapter 5. The minimum acceptable staffing level is three (3) qualified individuals per position.
- 2.9 **Mobilization** – The process of staffing the Emergency Response Facilities with the Emergency Response Organization. This process is initiated by announcements over Plant Gai-tronics System and activation of the Cellular Paging System.

3 **RESPONSIBILITIES**

- 3.1 **Emergency Preparedness (EP) Dept.** – Emergency Preparedness is responsible for:
- 3.1.1 Assisting the Department Heads or ERO Position Owners in maintaining the optimum staffing level of the ERO. This will include as a minimum, a periodic review in the last quarter of each year.
- 3.1.2 Coordinating with Operations, Training, and the Training Simulator Group at the end of each calendar year, to develop the drill schedule for the upcoming year and publish it. (Some drills are required to be unannounced.)
- 3.1.3 Developing, controlling and evaluating drills for the ERO. Other ERO members may assist in this function as requested by EP.
- 3.2 **ERO Position Owner** – This responsibility may be maintained by the Department Head of the department that “owns” the ERO position or may be delegated to a designee. The responsibility of ERO position owner is as follows:

- 3.2.1 Designate individuals to fill the respective ERO position(s) identified in Appendix 1. Staffing levels for the ERO positions are included in section 2.8 of this procedure. This includes filling any position vacancies due to transfers, rotations, retirements, or terminations.
- 3.2.2 Ensure personnel in the respective ERO positions are aware of their ERO position designation and that they maintain their ERO qualifications.
- 3.2.3 Coordinate with Emergency Preparedness and identify who will be participating in drills and Exercises as participants and as controllers.
- 3.2.4 Inform Emergency Preparedness clerk when personnel have been designated to the ERO position and when personnel will be removed from the ERO position.
- 3.3 **ERO Team Owners** – These are the Emergency Coordinators (ECs) for the TSC responders or Recovery Managers (RMs) for the EOF and JPIC responders. They have responsibility for:
- The performance of their team.
 - Coordination with the ERO Position Owner to review any changes to responders assigned to their team.
- 3.4 **Superintendent Protective Services** – The Superintendent of Protective Services or his designee has the responsibility to:
- monitor the ERO staffing levels periodically,
 - have specific ERO codes assigned to the selected responders,
 - verify the training requirements identified in EIP-ZZ-A0066 , RERP Training Program, have been completed prior to assigning the individual to an active responder position in the ERO,
 - approve revisions to Appendix 1.

<p><u>NOTE:</u> Complete qualification requirements for individuals being assigned to the ERO, will be verified prior to assignment to an ERO position and assigning an ERO code.</p>
--

- 3.5 **Emergency Preparedness Clerk** – When directed, the EP Clerk or designee will assign the appropriate ERO code in the ERO and Personnel databases. The clerk or designee will also arrange for the assignment of an ERO pager for the new responder.

3.6 **Emergency Response Organization (ERO) Members** –
Members have the following specific responsibilities:

- 3.6.1 Maintaining qualifications and requalifications as per **EIP-ZZ-A0066**.
- 3.6.2 Being aware, that if declared pregnant, they should not respond to any declared emergency and that their ERO code will be inactivated. **(CARS 200000370)**
- 3.6.3 Being aware that if their TLD is taken due to medical procedures, they should not respond to any On-site Emergency Response Facility, including the EOF, until their TLD is returned.

JPIC ERO members, except for the Technical Representatives in the EOF, should still respond even if their TLD has been taken.
(CARS 200105018)

- 3.6.4 Participating in required tests, drills, and exercises.

<p><u>NOTE:</u> When paged by the Plant for an Emergency, instructions are displayed on the pager. Any Group Pages that do not display Emergency Response Organization instructions should be disregarded. (CARS 199802824)</p>

- 3.6.4.1 The minimum response for a **TEST** is a phone call to the emergency Audix.
- 3.6.4.2 A **DRILL** requires that ERO personnel follow the instructions on the ERO pager. These may include augmentation call-out drills which may require a call to the emergency Audix or may require response to the Emergency Response Facility for team drills and expanded Rapid Responder drills.
- 3.6.4.3 An **EMERGENCY** requires the same response as a **DRILL**.

<p><u>NOTE:</u> If an ACTUAL Plant Emergency message is received, all ERO members that are fit for duty should respond.</p>

- 3.6.5 Apply an ERO sticker to driver license and get a new sticker if license is renewed.
- 3.6.6 Duty Responders (when on duty):

- 3.6.6.1 Wear or maintain assigned pager within hearing range at all times.
- 3.6.6.2 Maintain the duty cellular phone (if assigned) available for use at all times.
- 3.6.6.3 Remain "fit for duty" as specified in Callaway Plant Policies and Procedures.
- 3.6.6.4 Maintain ability to respond to their respective Emergency Response Facility within their response time goal, as specified in the RERP.
- 3.6.6.5 Respond to paging instructions safely and immediately.
- 3.6.6.6 Ensure duty exchange and turnover is verbal.
- 3.6.6.7 Notify Emergency Preparedness of previously arranged trades involving one day or greater so the duty schedule can be updated.
- 3.6.6.8 Rapid Responders responding to the EOF should be in possession of a key to the EOF to allow quick access.
- 3.6.6.9 Recovery Managers/Company Spokespersons, Technical Assessment Coordinators, Off-site Liaison Coordinators/EOF Communicators, and Dose Assessment Coordinators have Rapid Responder duty responsibilities as well as other Emergency Response Organization positions, and should respond to all emergency pages if fit for duty, even if not on duty.
- 3.6.6.9.1 All Spokespersons that are not Recovery Managers report to the JPIC. All other Recovery Managers report to the EOF. The JPIC has a 2-hour activation commitment; this would allow time for a Recovery Manager to report to the JPIC from the EOF in the event a Spokesperson had not reported for duty.
- 3.6.7 Responsibilities of Non-Duty Responders:

<p><u>NOTE:</u> Non-Duty Section Responders are considered emergency responders at <u>all times</u>. Exceptions are when the responder is not fit for duty, sick, on vacation, or out of the response area.</p>
--

- 3.6.7.1 Non-Duty Section Responder (all Pool Positions) are expected to maintain assigned pager within hearing range at all times.
- 3.6.7.2 Follow the instruction displayed on the pager in an immediate and safe manner.

4 PROCEDURE

4.1 Emergency Response Organization (ERO)

Mobilized at the ALERT or higher emergency classification or when deemed necessary by the Shift Supervisor. The ERO augments the on-shift emergency organization and consists of the Rapid Responders and Designated Emergency Response Personnel.

4.1.1 Normal Hours. Typically during normal working hours, Monday through Friday except for holidays, assigned members of the ERO are expected to man their respective facilities within a goal of 15 minutes from the time of declaration and be ready to assume peripheral duties from the Control Room within 30 minutes.

4.1.2 Off-Normal Hours. Assigned members of the ERO are expected to respond to the appropriate Emergency Response Facility within a goal of 75 minutes or less of the ALERT Emergency Declaration or decision to callout the ERO. The goal is to relieve the Control Room of the peripheral duties within 90 minutes or less of the declaration during off-normal hours.

4.2 Maintaining the Emergency Response Organization

4.2.1 Adding ERO Designations and Deleting ERO Designations

4.2.1.1 To add a person to the ERO or to remove a person from the ERO, the ERO Position Owner MUST use Form CA-#2448, Attachment 1.

4.2.2 ERO Staffing and Scheduling

4.2.2.1 Appendix 1 lists the ERO positions and the associated departments responsible for designating the personnel for the various positions.

4.2.2.2 The ERO Position Owners should be aware of the training qualification dates for the designated ERO personnel, the schedule of RERP training and retraining. The drill schedule is available on the EP Web Page.

4.2.2.3 RERP Retraining is scheduled annually and the ERO Position Owner should coordinate the needed ERO retraining and the training schedule to maintain the desired staffing levels for the position.

- 4.2.2.4 ERO Positions filled by Duty Responders will be assigned to a team by the ERO Position Owner and coordinated with the team leader.
- 4.2.2.5 ERO Positions filled by non-Duty Response personnel (Pool Positions) will be required to attend the annual retraining as scheduled and participate in drills as identified by the ERO Position Owner.
- 4.2.2.6 If an assigned ERO member is promoted, transfers between departments, or rotates to a position that does not fill an ERO position, the assigned ERO member is expected to maintain qualifications for the position until a replacement is designated and the ERO Position Owner and Team Leader agree to release the departing member and have the ERO code inactivated.
- It is recommended that ERO Position Owners have an additional person or two designated for the Emergency Response Positions for which their departments are responsible. These designated personnel should be trained and prepared to be assigned to an ERO position with minimal or no preparation in the event of transfer, promotion, or departure of assigned ERO Personnel.
- 4.2.3 ERO Drill Participation
- 4.2.3.1 EP will publish the schedule of drills shortly after the start of each year.
- 4.2.3.2 The ERO Position Owner must ensure that the team members (Duty Responders) are scheduled for the team drills. The non-Duty Responders (Pool Positions) MUST be scheduled to provide adequate support for the ERO and the drill schedule.
- Individual changes to the scheduled drill participation will be coordinated through the ERO Position Owner and Emergency Preparedness (EP).
- 4.2.4 Qualification Tracking
- 4.2.4.1 EP publishes and distributes the Emergency Telephone Directory per the Surveillance program. This is a listing of all qualified personnel assigned to specific ERO Positions at the time of the printing.
- 4.2.4.2 Training and EP can provide additional reports showing designated personnel and the status of their qualifications.

- 4.2.4.3 EP will review the staffing levels and contact the respective Department Heads or their designee if the number of qualified responders assigned to the specific ERO positions is below the optimum staffing level. This will ensure that Department Heads and ERO Position Owners are aware of position staffing levels.

5 REFERENCES

- 5.1 10CFR26, Fitness for Duty
- 5.2 10CFR50.47, Emergency Plans
- 5.3 10CFR50 Appendix E, Emergency Planning and Preparedness for Production and Utilization
- 5.4 Callaway Plant Radiological Emergency Response Plan (RERP)
- 5.5 NRC Reg Guide 1.101, Emergency Planning and Preparedness for Nuclear Power Reactors
- 5.6 NUREG 0654/FEMA-REP-01, Revision 1, November 1980
- 5.7 **APA-ZZ-00902**, Employee Personnel Changes, Termination, and/or Access Withdrawal
- 5.8 **EIP-ZZ-A0066**, RERP Training Program

6 RECORDS

- 6.1 Q. A. Records
None
- 6.2 Commercial Records
 - 6.2.1 Emergency Response Organization Maintenance Form, CA-#2448 (File Number K250.0010)

**EMERGENCY RESPONSE ORGANIZATION
ERO POSITION MAINTENANCE FORM**

Name of person to be added/removed from ERO

PIN Number

ERO Position

☒ When Complete
ERO ADDITION

– To be completed by the ERO Position Owner

- ☐ 1. Does the individual have color vision impairment? ☐ Yes ☐ No

NOTE: If color vision impairment is identified by the individual, Fitness for Duty Nurses will evaluate to determine if the impairment would prevent the individual from performing Emergency Response Organization duties. (CARS 199700904)

- ☐ 2. ERO Responsibilities (Section 3.6) have been discussed with the new ERO member.
- ☐ 3. Initial Training/Retraining has been scheduled for the new ERO member and the new ERO member is aware of the scheduled training.
- ☐ 4. Drill observation or Facility Walk-Through scheduled with a qualified individual (Qualified ERO member, Training Department, or Emergency Preparedness). (CARS 199803843) (May be N/A if experience warrants).
- ☐ 5. Team Leader accepts this person to fill the ERO position. (Emergency Coordinator for TSC positions and Recovery Manager for EOF positions.) Discussed with EC or RM.

_____ on _____.

Name

Date

- ☐ 6. ERO member qualified for the position in accordance with **EIP-ZZ-A0066**.

– To be completed by the person in the new ERO Position

- ☐ 1. Obtain and Apply responder sticker from EP clerk and apply to driver license. Provide form to EP Clerk.

– To be completed by the Emergency Preparedness Clerk

- ☐ 1. Pager Assigned. Number _____
- ☐ 2. ERO Listing updated on the EP Intranet Page and Personnel Database. (ERO code is "Active Status")

☒ When Complete
ERO DELETION

– To be completed by the ERO Position Owner

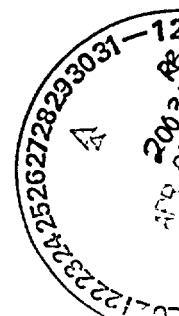
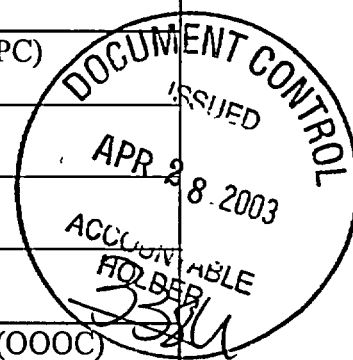
- ☐ 1. Arrangements have been made to ensure duty section is staffed until a permanent replacement has been identified, trained, and qualified.
- ☐ 2. Replacement ERO member has been identified and a CA # 2448 has been initiated for replacement.
- ☐ 3. ERO member advised not to respond as an ERO member, unless reinstated.

– To be completed by the Emergency Preparedness Clerk

- ☐ 1. ERO Code removed from Personnel Database and ERO member name updated on the EP Web Site
- ☐ 2. Pager and/or cellular telephone returned to EP Clerk.

Departmental/ERO Position Ownership Listing


Responsible Department and ERO Position Owner		Emergency Response Position
Manager Callaway Plant Warren Witt	Duty (1)	Emergency Coordinator OOEC
Training Department Bob Barton	Duty (1)	TSC Communicator (ENS) OENC
Training Department Bob Barton	Duty (1)	CR/TSC Liaison OCTL
Systems Engineering Steve Reed	Duty (1)	Technical Assessment Coordinator OTAC
Systems Engineering Steve Reed	Pool (1)	TSC Lead Engineer (OTLE)
Systems Engineering Steve Reed	Pool (3)	Engineering Statusboard/Logkeepers (OESS)
Systems Engineering Steve Reed	Pool (1)	Mechanical Engineer (OEMS)
Systems Engineering Steve Reed	Pool (1)	Electrical Engineer (OEES)
Systems Engineering Steve Reed	Pool(1)	Reactor/Nuclear Engineer (OERS)
Systems Engineering Steve Reed	Pool (1)	I&C Engineer (OEIS)
Chemistry Jim Small	Duty (1)	Chemistry Coordinator (OCHC)
Health Physics Bob Farnam	Duty (1)	Health Physics Coordinator (OHPC)
Security Mark Dunbar	Duty (1)	Security Coordinator (OOSC)
Administration Dick Rist	Duty (1)	Admin.Coordinator (OOAC)
Administration Dick Rist	Pool (As needed)	Clerical Support Staff (OCSC)
Operations Steve Sampson	Duty (1)	Operations Support Coordinator (OOOC)
Materials Jesse Jones	Pool (1)	Stores Personnel (OOSP)
Work Control Mechanical John Patterson	Pool (1)	E-Team Coordinator - Mechanical (OETM)
Work Control Electrical Dave Neterer	Pool (1)	E-Team Coordinator - Electrical (OETE)
V. P. Nuclear Ron Affolter	Duty (1)	Recovery Manager (CORM)
Training Bob Rehmeier	Duty (1)	Off Site Liaison/EOF Communicator (COLC/COEC)



April 25, 2003

Responsible Department and ERO Position Owner		Emergency Response Position
Training Bob Barton	Duty (1)	EOF Communicator (COEC)
Health Physics Bob Farnam	Duty (1) Pool (1)	Dose Assessment Coordinator (CDAC)
Health Physics Bob Farnam	TSC Pool (2)	R/C Support Personnel - Dose Assess Staff (CDAS)
Design Engineering Steve Reed	Pool 1 & 1	Protective Measures Coordinator/ Plant Assessment Coordinator (CPMC/CPAC)
Design Engineering Steve Reed	Pool (2)	Plant Assessment Staff (CPAS)
Materials Engineering Dan Stepanovic	Pool (1)	Logistics Support Coordinator (CLSC)
Materials Engineering Dan Stepanovic	Pool (2)	Logistic Support Staff (CLSS)
Administration Dick Rist	Pool (As needed)	Clerical Support Staff (OCSS)
V.P. Nuclear Ron Affolter	Pool (1)	Company Spokesperson (CSP)
Protective Services Dale Lewis	Duty (1) in JPIC	Tech Rep (JPIC) (CJTR-)
Protective Services Dale Lewis	Duty (1) in EOF	Tech Rep (EOF) (CJTR)
Protective Services Dale Lewis	TBD	Tech Reps (County EOC, 4 Locations)
Personnel John Neudecker	Duty (1)	JPIC Coordinator (CPJC)
Personnel John Neudecker	Duty (1)	JPIC Editor (CPJE)
Supt. Performance Improvement Vern McGaffic	Duty (1)	JPIC Administrator (CPJA)
Manager Quality Assurance Chuck Slizewski	Duty (1)	JPIC Media Host (CPJH)

(N) Numbers in parenthesis are the number of responders typically needed to respond for that position

Approved:  Date: 4-25-03
Supt. Protective Services