



August 20, 2003

L-2003-219
10 CFR 50 Appendix E

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

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Emergency Plan Implementing Procedure

In accordance with 10 CFR 50 Appendix E, enclosed is a copy of a procedure that implements the St. Lucie Plant Radiological Emergency Plan.

<u>Number</u>	<u>Title</u>	<u>Revision</u>	<u>Implementation Date</u>
EPIP-13	Maintaining Emergency Preparedness - Emergency Exercises, Drills, Tests And Evaluations	7B	August 14, 2003

Revision 7B to EPIP-13 was a minor change to correct the Manager, Plant Services title. Please contact us if there are any questions regarding this procedure.

Very truly yours,

William Jefferson, Jr.
Vice President
St. Lucie Plant

WJ/tlt

Enclosure

A045

**FPL**

ST. LUCIE PLANT

EMERGENCY PLAN IMPLEMENTING PROCEDURE

SAFETY RELATED

Procedure No.

EPIP-13

Current Revision No.

7B

Effective Date

08/14/03

Title:

MAINTAINING EMERGENCY PREPAREDNESS - EMERGENCY EXERCISES, DRILLS, TESTS AND EVALUATIONS

Responsible Department: **EMERGENCY PLANNING****REVISION SUMMARY:**

Revision 7B - Incorporated PCR 03-0292 to correct title to manager, plant services. (J. R. Walker, 07/30/03)

Revision 7A - Incorporated PCR 03-1890 to delete references to protection services. (Margaret DiMarco, 06/06/03)

Revision 7 - Added step to forward critique items to TRNG MGR via PMAI, added steps to ensure drill exercise scope and duration adequate to meet each participating agency objectives and made editorial / administrative changes. (J. R. Walker, 06/28/02)

Revision 6 - **THIS PROCEDURE HAS BEEN COMPLETELY REWRITTEN.** Reformatted program maintenance checklists. Changed frequency of facility surveillances. Made administrative/editorial changes. (R. Walker, 09/27/01)

Revision 5 - Added quarterly test for ERDS link and reference to Generic Letter #GL 93-01. (J. R. Walker, 12/07/00)

AND

Deleted reference to PSL policy PSL-110, revised FRG review of EIPs, changed the symbol of response to CR00-0544 from regulatory commitment to mgmt directive and added EPIP-08 to the list of EIPs. (J. R. Walker, 10/13/00)

Revision 0	FRG Review Date 12/15/97	Approved By J. Scarola Plant General Manager	Approval Date 12/15/97	S__OPS DATE DOCT DOCN SYS COM ITM	PROCEDURE EPIP-13 COMPLETED 7B
Revision 7B	FRG Review Date 06/27/02	Approved By Dick Rose Plant General Manager N/A Designated Approver D. Calabrese Designated Approver (Minor Correction)	Approval Date 06/28/02 07/30/03		

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1.0 PURPOSE

1.1 This procedure provides instructions for:

1. Periodic exercises and drills conducted in order to test the state of emergency preparedness by FPL personnel, support organizations and off-site governmental agencies.
2. Periodic tests and reviews of components of the Emergency Planning Program (e.g. facilities, equipment, Emergency Plan and Emergency Plan Implementing Procedures, etc.) conducted to ensure availability, operability and reliability.

2.0 REFERENCES / RECORDS REQUIRED / COMMITMENT DOCUMENTS

NOTE

One or more of the following symbols may be used in this procedure:

§ Indicates a Regulatory commitment made by Technical Specifications, Condition of License, Audit, LER, Bulletin, Operating Experience, License Renewal, etc. and shall NOT be revised without Facility Review Group review and Plant General Manager approval.

¶ Indicates a management directive, vendor recommendation, plant practice or other non-regulatory commitment that should NOT be revised without consultation with the plant staff.

Ψ Indicates a step that requires a sign off on an attachment.

2.1 References

- §₁ St. Lucie Plant Radiological Emergency Plan (E-Plan)
- ¶₁ QI 1-PR/PSL-1, Site Organization
- ¶₂ QI-1-PSL-15, Security Organization
- ¶₃ QI-5-PSL-1, Preparation, Revision, Review/Approval of Procedures
- ¶₄ QI-17-PSL-1, Quality Assurance Records
- NBS-NPS-EP-WP-001, Public Alert and Notification System Testing, Maintenance and Engineering
- ADM-25.02, NRC Performance Indicators

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2.2 Records Required

- ¶₄ The following records are maintained in accordance with QI-17-PSL-1, Quality Assurance Records:
 - Data Sheet 1, Quarterly EP Maintenance Checklist
 - Data Sheet 2, Emergency Plan 6 Year Element Demonstration
 - Data Sheet 3, EPIP Biennial Review
 - Data Sheet 4, EP Annual Exercise Checklist
 - Attachment 1, EP Program Maintenance Checklist

2.3 Commitment Documents

- §₂ 10 CFR 50, Domestic Licensing of Production and Utilization Facilities
- §₅ Generic Letter #GL 93-01, Emergency Response Data System Test Program
- ¶₅ PMAI #96-02-237, Evaluation of Continuous Emergency Response
- §₃ NOV Response L-97-20, Violation II. A, Part 4.D.
- ¶₆ CR 00-0544, QA Audit (Ineffective Corrective Actions) QSL-EP-00-02
- ¶₇ Quality Assurance Audit Report, QSL-EP-02-02, Improvement Item (Forward Critique Reports to Site Training Manager)
- ¶₈ PMAI PM02-03-001 (Adequacy of Drill / Exercise Scope and Duration)

3.0 RESPONSIBILITIES

3.1 §₁ The Manager, Plant Services is responsible for:

1. Planning, scheduling, and coordinating emergency exercises involving off-site agencies.
2. Reviewing Attachment 1, EP Program Maintenance Checklist, upon completion.
3. Reviewing results of exercises and major drills.

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3.2 §1 The Manager, Plant Services, in conjunction with plant management, is responsible for ensuring that adequate resources are made available to support and conduct emergency preparedness activities including:

- 1.** Exercise and drill scenario development and control
- 2.** Exercise and drill participation
- 3.** Support for maintenance of emergency facilities and equipment

3.3 §1 The Facility Review Group (FRG) is responsible to review the following:

- 1.** Revisions to the St. Lucie Plant Radiological Emergency Plan.
- 2.** Revisions to Emergency Plan Implementing Procedures (EPIPs) other than minor changes.
- 3.** Biennial Exercise Critique Report.

3.4 The Emergency Preparedness (EP) Supervisor is responsible for:

- 1.** Maintaining awareness of EP activities.
- 2.** Ensuring coordination of EP drills and exercises in accordance with this procedure.
- 3.** Ensuring documentation of EP program maintenance in Attachment 1, EP Maintenance Checklist.
- 4.** Ensuring documentation of major element demonstration as indicated on Data Sheet 2, Emergency Plan 6 Year Element Demonstration.
- 5.** Ensuring critiques of exercises, drills, and actual events are conducted, documented, and that deficiencies are addressed in accordance with plant corrective action practices.
 - A. ¶17** Drill and exercise critiques should be forwarded, via PMAI, for review by the Site Training Manager for needed changes to training courses or materials.
 - B.** Drill and exercise critiques should be forwarded to the applicable Emergency Response Facility (ERF) managers and / or supervisors for possible correction to open performance discrepancies, if deemed appropriate by the EP Supervisor.

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3.4 The Emergency Preparedness (EP) Supervisor is responsible for: (continued)

- 6. Ensuring that EIPs are reviewed through feedback from the following sources:**
 - A. Daily use**
 - B. Drills and exercises**
 - C. Actual events**
 - D. Training**
 - E. Biennial EPIP review as indicated on Data Sheet 3, EPIP Biennial Review**
- 7. Ensuring biennial review of the Recovery Plan.**

4.0 DEFINITIONS

4.1 Annual - Annual is defined as once per calendar year (January 1 through December 31).

4.2 Biennial - Biennial is defined as once per two calendar years.

4.3 Drill

- 1. Communications Tests and Drills - Communications tests involve the use of emergency communications equipment to verify operability. Communications drills involve use of emergency communications equipment to notify and transfer simulated emergency information to off-site governmental agencies.**
- 2. Health Physics Drills - Health Physics drills test various tasks employed by that department during an emergency condition. Health Physics drills are conducted semi-annually and one of the semi-annual drills may be incorporated into the radiological monitoring drill.**
- 3. Medical Emergency Drill - A medical emergency drill involves a simulated contaminated individual, with provisions for activation of the plant First Aid/Personnel Decontamination Team. Participation by local support services (i.e., ambulance and off-site medical treatment facility) is tested separately once per year or as part of the annual medical drill. Medical Emergency Drills are conducted at least once every calendar year.**

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4.3 Drill (continued)

- 4. Radiological Monitoring Drill** - Radiological monitoring drills include collection and analysis of air samples, testing of communications, and understanding of messages between Health Physics supervision and the off-site monitoring teams. A radiological monitoring drill will be conducted at least once every calendar year.
- 5. Emergency Response Facility (ERF) Drill** - An ERF Drill demonstrates various emergency response capabilities including management and coordination of emergency response, accident assessment, protective action decision-making, and plant system repair and corrective action involving all or certain Emergency Response Facilities [Control Room, Technical Support Center (TSC), Operational Support Center (OSC), Emergency Operations Facility (EOF), and/or Emergency News Center (ENC)]. These drills are conducted at least four (4) times per calendar year and should be conducted approximately once each calendar quarter. One of these drills is designed to satisfy the requirements of an exercise as defined below.

Non-exercise drills provide an opportunity to consider accident management strategies. Supervised instruction can be permitted for these drills, with operating staff having the opportunity to resolve problems (success paths) rather than have controllers intervene. Additionally, non-exercise drills may focus on on-site training objectives.

- 4.4 Exercise** - An exercise is an event that tests the integrated capability of a major portion of the basic elements existing within the St. Lucie Plant Radiological Emergency Plan. An exercise is required biennially per 10 CFR 50. Off-site agency participation is required biennially. Exercises are developed, scheduled, and conducted in a manner consistent with the regulations and guidance of 10 CFR 50 Appendix E, NUREG 0654, and other appropriate regulatory documents. Biennial exercises involving off-site agencies shall be conducted as a Site Area Emergency and should escalate to General Emergency. The exercise scenarios are varied such that all major elements of the Plan are tested at least every six (6) years.

- 4.5 Letter of Agreement (LOA)** - Support or assistance from outside agencies is established and maintained through Letters of Agreement or, in some instances, purchase orders/contracts.

Letters of Agreement are confirmed annually through correspondence, direct contact, or by telephone. Each agreement is renewed at least every three (3) years. Purchase orders/contracts are renewed as required.

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- 4.6 Monthly** - Monthly is defined as at least once each calendar month, being the first day of each month until the last unless otherwise specified.
- 4.7 Quarterly** - Quarterly is defined as once per calendar quarter, with the quarters being January through March, April through June, July through September and October through December.
- 4.8 Semi-annual** - Semi-annual is defined as twice per calendar year, with one time from January 1 to June 30 and one from July 1 to December 31.

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5.0 INSTRUCTIONS

5.1 Manager, Plant Services Instructions

- 1. REVIEW** completed documentation of Attachment 1, EP Program Maintenance Schedule, on an annual basis.
- 2. ENSURE** that State and County Emergency Management officials are made aware of non-emergency events that have a potential for media interest.
 - A. INFORM** Emergency Preparedness (EP) of event
 - B. VERIFY** that EP has informed appropriate Emergency Management officials.
- 3. §1 ENSURE** that State and County Emergency Management officials are made aware of the following on an annual basis:
 - A. Significant** changes to the Emergency Plan/EIPs.
 - B. Emergency** Action Levels (EALs)
- 4. MAINTAIN** awareness of the status of the Alert and Notification System (ANS) operability.
 - A. ENSURE** that degradations of the ANS are promptly addressed.
 - 1. The** Manager, Nuclear Plant Support Services is responsible to maintain operability of the ANS per NBS-NPS-EP-WP-001, Alert and Notification System Testing, Maintenance and Engineering.
- 5. §1 ENSURE** the following is performed in support of exercises:
 - A. SCHEDULE** a date for the exercise in coordination with the primary State and County emergency response agencies.
 - B. PROVIDE** the opportunity for State and County response agencies to participate in an exercise.
 - C. ¶8 ENSURE** that annual exercise scenarios address the objectives of each participating agency.

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5.1 Manager, Plant Services Instructions (continued)

5. (continued)

D. COORDINATE FPL efforts with other participating personnel, organizations, and agencies.

- 1. If the Federal Emergency Management Agency (FEMA) is evaluating State and County emergency response, Then ENSURE that the exercise scenario is developed within the timeframes specified by the regulations, as defined in Data Sheet 4, EP Annual Exercise Checklist.**

E. DISCUSS and EVALUATE annual exercise performance with plant management, FPL controller/evaluators and principal participants.

END OF SECTION 5.1

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5.2 Emergency Preparedness Supervisor

- 1. At the beginning of each calendar year:**
 - A. REVIEW** the items on Attachment 1, EP Program Maintenance Checklist and **ESTABLISH** a working schedule.
- 2. MAINTAIN** awareness of status of completion of Attachment 1, EP Program Maintenance Checklist.
 - A.** Response actions performed as part of actual plant emergencies may be **CREDITED** as completing one or more of the following drills or tests:
 - integrated facility activation drill
 - call out phone test/drill
 - HP drill
 - off-site agency communications
 - medical drill
 - B.** Activities incorporated within a multiple scope drill or exercise may be **CREDITED** as completing a drill or test, for example:
 - HP drill, medical drill, off-site communications, etc.
 - C. ¶16** Off Hours Augmentation including:
 - weekly tests of automated recall system
 - quarterly off-hours phone test (at least one per year should be manual)
 - monthly review of Emergency Response Directory
 - quarterly verification of Emergency Response Directory data
 - quarterly verification of Emergency Response Directory distribution list
 - quarterly publication and distribution of Emergency Response Directory

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5.2 Emergency Preparedness Supervisor (continued)

2. (continued)

D. NRC Performance Indicators

- **PREPARE and SUBMIT** in accordance with ADM-25.02

3. ENSURE completion of the items on Data Sheet 1, Quarterly EP Maintenance Checklist.

4. ENSURE the completion of the items on Data Sheet 2, Emergency Plan 6 Year Element Demonstration.

5. ENSURE the completion of the items on Data Sheet 3, EPIP Biennial Review.

6. ENSURE the completion of the items on Data Sheet 4, EP Annual Exercise Checklist.

7. REVIEW annual drill and exercise program with state and county representatives.

8. ¶₈ ENSURE the scope and duration of annual exercise is adequate to meet objectives of each participating off-site agency.

END OF SECTION 5.2

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ATTACHMENT 1
EP PROGRAM MAINTENANCE CHECKLIST
(Page 1 of 3)

	(YEAR)_____
<u>Semi-Annual/Annual/Biennial EP Maintenance Items:</u>	<u>INITIAL / DATE</u>
§ ₁ 1. HP Drill (Semi-Annual)	
A. (Jan-Jun) Date____/____/____	____/____
B. (Jul-Dec) Date____/____/____	____/____
§ ₁ 2. Radiological Monitoring Drill (Annual)	
A. Date____/____/____	____/____
§ _{1,2} 3. Biennial Exercise (Include Data Sheet 4, EP Exercise Checklist)	
A. Date____/____/____	____/____
B. FEMA Evaluated (Even Years Only) <u>Yes / No</u>	____/____
§ ₁ 4. Annual Offsite Agencies Communications Drill	
A. Date____/____/____	____/____
§ ₁ 5. Annual Unannounced Communications Drill	
A. Date____/____/____	____/____
§ ₁ 6. Annual Medical Drill	
A. Date____/____/____	____/____

S__OPS	
DATE	_____
DOCT	<u>CHECKLIST</u>
DOCN	<u>EPIP-13</u>
SYS	_____
COMP	<u>COMPLETED</u>
ITM	<u>REV</u>

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ATTACHMENT 1
EP PROGRAM MAINTENANCE CHECKLIST
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		(YEAR)_____
<u>Semi-Annual/Annual/Biennial EP Maintenance Items (continued):</u>		<u>INITIAL / DATE</u>
§1	7. Emergency Plan Review:	_____/____
	A. Emergency Plan Review (Annual)	_____/____
	B. Letters of Agreement Certification (Annual Confirmation/Triennial Renewal)	_____/____
	C. EPIP Review (Even years only) (Include Data Sheet 3, EPIP Biennial Review)	_____/____
§1	8. Media Day (Annual)	_____/____
§1	9. Public Information Brochure (Annual)	_____/____
§1	10. Review and update Six Year Plan (Annual) (Include Data Sheet 2, Emergency Plan 6 Year Element Demonstration)	_____/____
§1	11. Significant Emergency Plan/EPIP Changes, Emergency Action Levels (EALs) Meeting with State/County Emergency Management (Annual)	_____/____
§1	12. Hospital Training (Annual)	_____/____
§1	13. Off-site Training (Annual)	_____/____
	14. Recovery Plan Review (Biennial)	_____/____

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ATTACHMENT 1
EP PROGRAM MAINTENANCE CHECKLIST
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(YEAR)_____

Semi-Annual/Annual/Biennial EP Maintenance Items (continued): INITIAL / DATE

15. Annual training review of ERO

A. Solicit verification of annual ERO training completion from the Training Department. _____/_____

B. Review training completion feedback and remove any ERO members not qualified. _____/_____

Quarterly EP Maintenance Items (complete Data Sheet 1
Quarterly EP Maintenance Checklist for each of the following):

- | | |
|--------------|-------------|
| 1. Quarter 1 | _____/_____ |
| 2. Quarter 2 | _____/_____ |
| 3. Quarter 3 | _____/_____ |
| 4. Quarter 4 | _____/_____ |

Completed by _____
Emergency Preparedness Supervisor

Reviewed by _____
Manager, Plant Services

END OF ATTACHMENT 1

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DATA SHEET 1
QUARTERLY EP MAINTENANCE CHECKLIST
(Page 1 of 2)

QUARTER _____ (YEAR) _____

INITIAL / DATE

1. Emergency Response Facility Surveillance:

_____/____

Date

A. TSC _____

§1 1. Monthly Communications Survey

Dates: _____

B. OSC _____

C. EOF _____

2. ¶6 Off-Hours Augmentation Methodologies:

A. Weekly test of automated emergency recall system (Autodialer).

_____/____

Dates: _____

B. Monthly review of Emergency Response Directory.

_____/____

Dates: _____

C. Quarterly verification of Emergency Response Directory Data.

_____/____

D. Quarterly verification of Distribution List for Emergency Response Directory.

_____/____

E. Quarterly publication of Emergency Response Directory.

_____/____

3. Quarterly Integrated Facility Activation Drill

Drill Date _____

_____/____

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DATA SHEET 1
QUARTERLY EP MAINTENANCE CHECKLIST
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QUARTER _____ (YEAR) _____

INITIAL / DATE

4. Quarterly Off-Hours Call-Out Phone Test

Drill Date _____ / _____

5. Quarterly Self-Assessment

_____ / _____

6. Quarterly submittal of EP Performance Indicators

_____ / _____

A. Participation _____

B. Drill & Exercise Performance _____

C. Alert & Notification System _____

7. §5 Quarterly test of the NRC Emergency Response Data System (ERDS) link.

_____ / _____

NOTES:

END OF DATA SHEET 1

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DATA SHEET 2
EMERGENCY PLAN 6 YEAR ELEMENT DEMONSTRATION
(Page 1 of 1)

YEAR _____

Element	Year Last Performed	Year Next Scheduled	Date Completed/ Initial
Off hours staffing (6 P.M. - 4 A.M.)			
Activation of Emergency News Center			
Use of fire control teams			
Use of medical support personnel			
Use of Security personnel for prompt access to emergency equipment or support			
Use of one or more portions of backup communications for notification			
Field monitoring			
Capability for determining the magnitude and impact of the particular components of a release			
Capability for post-accident coolant sampling and analysis			
Assembly and accountability			
Initial recovery planning activities			

END OF DATA SHEET 2

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DATA SHEET 3
EPIP BIENNIAL REVIEW
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(YEAR)_____

I. Emergency Plan Implementing Procedures (Biennial)

		Revision No.	Date Reviewed	PCR Y / N
EPIP-00	Discovery and Identification of an Emergency Condition (including Chemical, Fire and Natural Emergencies)			
EPIP-01	Classification of Emergencies			
EPIP-02	Duties and Responsibilities of the Emergency Coordinator			
EPIP-03	Emergency Response Organization Notification/Staff Augmentation			
EPIP-04	Activation and Operation of the Technical Support Center			
EPIP-05	Activation and Operation of the Operational Support Center			
EPIP-06	Activation and Operation of the Emergency Operations Facility			
EPIP-07	Conduct of Evacuations/Assembly			
EPIP-08	Off-site Notifications and Protective Action Recommendations			
EPIP-09	Offsite Dose Calculations			
EPIP-10	Off-Site Radiological Monitoring			
EPIP-11	Core Damage Assessment			
EPIP-12	Maintaining Emergency Preparedness - Radiological Emergency Plan Training			
EPIP-13	Maintaining Emergency Preparedness - Emergency Exercises, Drills, Tests and Evaluations			
HP-90	Emergency Equipment			
HP-200	HP Emergency Organization			
HP-201	Emergency Personnel Exposure Control			

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DATA SHEET 3
EPIP BIENNIAL REVIEW
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(YEAR)_____

I. Emergency Plan Implementing Procedures (Biennial) (continued)

		Revision No.	Date Reviewed	PCR Y / N
HP-202	Environmental Monitoring During Emergencies			
HP-203	Personnel Access Control During Emergencies			
HP-204	In Plant Radiation and Contamination Surveys during Emergencies			
HP-205	Emergency Inplant Air Sampling			
HP-206	Analysis of Emergency Inplant Air Samples			
HP-207	Monitoring Evacuated Personnel During Emergencies			
HP-208	Personnel Decontamination During Emergencies			
COP-06.06	Guidelines for Collecting Post Accident Samples			
COP-06.11	Establishing Remote Laboratory for Analysis of Accident Samples			

END OF DATA SHEET 3

