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INTEROFFICE MEMORANDUM

DATE: December 01, 2003

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FROM: Procedure Control, Administrative Services, Columbia Generating Station (901A)

SUBJECT: PLANT PROCEDURES MANUAL - VOLUME SWP
PACKAGE NO. 2003-817

REFERENCE:

The following Procedure(s) have been revised/approved and are to be inserted in your controlled copy of the Manual and the superseded revisions are to be removed and destroyed:

<u>Procedure</u>	<u>Rev</u>	<u>Title/Comments</u>
SWP-EPP-01	10	Emergency Response Organization and Training

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SWP-EPP-01



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**COLUMBIA GENERATING STATION
SITE-WIDE PROCEDURES**

NUMBER *SWP-EPP-01	APPROVED BY JVP - Revision 10	DATE 12/01/03
ORGANIZATION SITE-WIDE PROCEDURES		
ACTIVITY EMERGENCY PREPAREDNESS		
TITLE EMERGENCY RESPONSE ORGANIZATION AND TRAINING		

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1.0 PURPOSE

This procedure lists Energy Northwest's Emergency Response Organization (ERO) and identifies responsibilities for participation by, and training of, the ERO.

2.0 DISCUSSION

- 2.1 ERO positions, response categories and position requirements that comply with Emergency Plan requirements and Emergency Preparedness business practices are assigned by response category as indicated in the Columbia Generating Station Emergency Plan.
- 2.2 Energy Northwest's ERO consists of positions that satisfy Emergency Preparedness Plan requirements for initial and augmenting staffing during declared emergency events as well as positions that may be summoned as needed. The positions are arranged in the following response categories:

2.2.1 On shift

This category consists of plant positions staffed by shift personnel that satisfy FSAR, technical specification, and security plan requirements for the normal conduct of plant operations. In a declared emergency, shift personnel provide initial staffing for emergency positions identified by the Columbia Generating Station Emergency Plan. In certain cases, shift personnel may satisfy staffing requirements for more than one emergency position identified in the Plan, such as Equipment Operators performing emergency maintenance tasks as well as serving as fire brigade members.

2.2.2 Essential

This category consists of positions necessary to activate emergency centers within 60 minutes of being notified to respond. Essential ERO personnel will assist on shift personnel to provide assessment and mitigation of accident conditions, notifications to offsite agencies, or provide overall direction, control and logistical support for emergency operations.

2.2.3 Augmenting

This category consists of positions expected to be present in emergency centers within 60 minutes of being notified to respond. Augmenting personnel provide additional emergency assessment, accident mitigation and logistics support to on shift and essential personnel.

2.2.4 Support

This category consists of positions which are summoned when needed to support emergency operations.

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3.0 RESPONSIBILITIES

{R-1582, R-1583, R1604}

- 3.1 Senior management personnel (i.e., Energy Northwest Vice Presidents) are responsible for maintaining an ownership role of emergency facilities and functions, as follows:
- 3.1.1 Emergency Operations Facility (EOF) - Vice President, Technical Services
 - 3.1.2 Technical Support Center (TSC) - Vice President, Nuclear Generation
 - 3.1.3 Operations Support Center (OSC) - Vice President, Nuclear Generation
 - 3.1.4 Joint Information Center (JIC) - Vice President, Energy and Business Development
 - 3.1.5 ERO Team E - Vice President, Corporate Services/General Counsel
- 3.2 The Supervisor, Emergency Preparedness, is responsible for administering an EP program that fulfills the commitments and intents of the Columbia Generating Station Emergency Plan, and:
- Has overall responsibility for implementation and maintenance of the Emergency Preparedness Training Program.
 - Has responsibility for approval of personnel assignment and removal from the ERO.
 - Ensures program meets required internal and external program and quality requirements.
 - Maintains and implements a schedule of drills and exercises.
- 3.3 The Operations Manager is responsible for ensuring that Operations personnel are qualified for and aware of their emergency response responsibilities and assignments.
- 3.4 The Radiation Protection Manager is responsible for ensuring that Health Physics personnel are qualified for and aware of their emergency response responsibilities and assignments.
- 3.5 The Chemistry Manager is responsible for ensuring that Chemistry personnel are qualified for and aware of their emergency response responsibilities and assignments.

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- 3.6 The Maintenance Manager is responsible for ensuring that Electrical, Mechanical, and I & C craft, and supervision is qualified for and aware of their emergency response responsibilities and assignments.
- 3.7 The Training Department Manager is responsible for ensuring that the appropriate training courses are listed in the personnel qualification directories. In addition, the Training Department Manager is responsible for EP related training for the Fire Brigade, First Responders, Health Physics and Chemistry Technicians. The Training Department Manager also:
- Provides for the development, implementation and maintenance of emergency preparedness training courses unique to control room emergency operations based on Vol. 5 of the PPMs, Emergency Operating Procedures.
 - Provides for instruction of accident identification and classification training for required emergency response personnel.
- 3.8 The Operations Training Manager is responsible for:
- Review and sign-off of lesson plans and exams applicable to licensed training.
 - Ensure emergency preparedness training schedules are coordinated with initial licensed training and requalification cycles.
 - Provide simulator and scenario support for the Emergency Preparedness Drill and Exercise program.
- 3.9 The Manager, Resource Protection, is responsible for providing programmatic approval of the Emergency Preparedness Program.
- 3.10 The Supervisor, Security Force, is responsible for providing emergency response training to security force personnel and security personnel assigned to specific emergency centers.
- 3.11 All on call ERO members have the responsibility to:
- Respond to their emergency centers within 60 minutes of notification to report to their emergency center.
 - When on call, remain fit for duty, and remain within 60 minutes of their emergency center.

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- Arrange for alternate qualified coverage when unavailable for on call duty.
 - Maintain ERO qualifications.
 - Participate in drills and exercises when scheduled.
- 3.12 All Essential category ERO members are expected to carry their pagers with them at all times, even when not on call.
- 3.13 All Essential ERO members have the responsibility to respond to their emergency centers within 60 minutes, when available.
- 3.14 Essential ERO members reporting to their emergency center should remain there until dismissed by their center manager.
- The first arrivals will assume their respective emergency center positions until relieved.
- 3.15 At times, extended emergency center staffing is necessary. It is expected that the ERO team responsible for the initial emergency response will be relieved by a second shift which consists of the next ERO team due for on call duty.
- 3.16 Drill Controllers and Evaluators (Team E)
- A core group assigned by line management.
 - This core group
 - attends training as scheduled
 - maintains qualifications current
 - attends pre-drill preparation and briefings as scheduled.
 - Members of ERO teams may provide controller/evaluator functions.
 - May be augmented by subject matter experts (SMEs) peers, or others as designated by the Supervisor, Emergency Preparedness.
 - Responsible for facilitating drill and exercise performance.
- 3.16 Lead Evaluators
- Responsible for providing:

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- written summary of center performance
- completed Evaluation Criteria Checklist
- DEP Checklist (for Control Room, Emergency Operations Facility and Technical Support Center)
- Attend post drill Lead Evaluator debriefing
 - provides written summary of center performance, including input from supporting center evaluators.
- A final center evaluation report is due to the lead Drill Controller within three working days of the Lead Evaluator Debriefing.

3.17 Lead Center Controllers

- Selected by the Supervisor, Emergency Preparedness.
- One controller per emergency center.
- Facilitates conduct of the drill or exercise per EPI-21.
- Attends pre- and post-drill and exercise briefings.

3.18 Drill Coordinator

- Selected by the Supervisor, Emergency Preparedness; may be a lead Center Controller.
- Responsible for overall drill or exercise conduct.
- Attends pre- and post-drill and exercise briefings for controllers and evaluators.

4.0 PROCEDURE/GUIDELINES

The Qualification Directory target population description should be consulted when selecting individuals for ERO duty.

4.1 Line management provides personnel for assignment to the ERO.

- Line management designates replacement personnel as soon as practicable; ideally, three months before an expected vacancy. In addition, line management communicates names of ERO candidates to EP management.

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- Line management plans and manages ERO selection and rotation to meet business needs, and needs of personnel.
- 4.2 Individuals selected for ERO participation must be qualified prior to ERO position assignment. Refresher training and participation in drills to ensure retention and familiarity with ERO duties will be administered on a calendar year basis (i.e., annually) to ERO personnel. Individuals not completing annual refresher training by December 31 of the current year will be disqualified to fill their ERO position until the training requirements are brought up-to-date.
- 4.3 An ERO assignment list is maintained by Emergency Preparedness that identifies personnel who have been assigned to staff emergency positions. This list is verified, published and distributed quarterly as a section of the Emergency Phone Directory.
- 4.4 Maintenance responsibilities may also be covered by certain members of the On-shift Crew during the initial stages of an event. These duties may involve minor mechanical, electrical, or instrumentation and control (I&C) actions, such as tightening the packing on a valve, racking in a breaker, venting a gauge, and reading blueprints or piping and instrumentation drawings. Training to support these Maintenance duties is provided by the Training Department as part of the Operator Training program. Equipment Operators who fill this role receive basic Maintenance training in accordance with the Equipment Operator Qualification Directory.
- 4.5 The Emergency Preparedness Training Program is a combination of classroom and performance-based training designed to provide the instruction necessary to develop and maintain ERO personnel skills and knowledge. Credit is taken for certain aspects of craft and fire brigade related skill training administered by the Training Department for ERO skills and knowledge.

4.5.1 Program Content Description {R5876}

The program consists of a combination of classroom, hands-on, and in-the-field training. Where appropriate, initial and/or refresher training can also be conducted using a seminar or workshop format when group discussion is an important benefit.

4.5.2 Initial Training {R-5875}

Initial training is designed to provide the position-specific skills and knowledge necessary for an individual to perform the functions of the emergency position.

Individuals assigned to an emergency center are scheduled for the Emergency Preparedness Overview and Emergency Center specific operations training for that center. Additional training required for an individual's position is

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provided on an as needed basis. The requirements of each emergency position, and specific EP courses are detailed in the Qualification Directory.

Individuals assigned to the on shift crews are scheduled for emergency response training during their normal training cycle. Some positions in the on shift emergency organization are filled by individuals who receive cross training or add on training so that they can fill multiple emergency response functions (refer to Attachment 6.1). The requirements for the on shift emergency positions are detailed in the Training Department's Qualifications Directories. Some of the basic emergency response training is also provided in the General Employee Training program.

Upon completion of training, the students are normally required to pass a written exam, or to demonstrate performance-based actions, e.g., during a drill or exercise. {C-7972}

4.5.3 Refresher Training

Refresher training is required on an annual basis for all ERO personnel and is conducted using training or drill participation.

Successful completion of annual license requalification training for the following Control Room positions adequately refreshes course content for Emergency Classification and Notifications:

Shift Manager
Control Room Supervisor
Control Room Operator
Shift Technical Advisor/Incident Advisor/Emergency Response SRO

4.5.4 EPIP Required Reading

Personnel assigned to Plant emergency centers are made aware of EPIP revisions through the change management process. This process is designed to provide emergency response personnel with information regarding procedure revisions affecting their specific positions.

4.5.5 Emergency Drill Program

The emergency drill program utilizes drills as on-the-job training. Participants are evaluated during the performance of their job and on-the-spot corrections/training is conducted. Problems identified from drills may be incorporated into annual refresher training, covered during a tabletop, discussed via email or other appropriate methods.

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4.6 Additional Training

4.6.1 There are additional areas where training required for emergency response is incorporated into programs maintained and presented by other training groups. These training requirements are documented by Qualification Management Services and compliance is reviewed regularly by Emergency Preparedness.

4.6.2 Cross Training for certain ERO members is provided by other training groups in the following areas:

- HP/Chem, General Employee Training (GET)
- Fire Brigade Training
- Respiratory Protection/Self-Contained Breathing Apparatus (SCBA) Training
- Security Emergency Response Training

5.0 REFERENCES

- 5.1 10CFR50.47, Emergency Plans {R-1582, R-1583, R-1604}
- 5.2 10CFR50.54, Conditions of Licenses
- 5.3 10CFR50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities {R-5706, R-5875, R-5876}
- 5.4 44CFR350, Review and Approval of State and Local Radiological Emergency Plans and Preparedness
- 5.5 NUREG-0654, FEMA REP-1, Revision 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
- 5.6 FSAR Chapter 13.3, Columbia Generating Station Emergency Plan
- 5.7 PPM 1.3.1, Operating Policies, Programs and Practices
- 5.8 SWP-FFD-01, Fitness for Duty Program Requirements
- 5.9 IOM, JV Parrish to All Supply System Employees, 10/14/96
- 5.10 IR 83-43 (PTL H105631) {C7972}

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5.11 Qualification Directory

5.12 EPI-21, Drill and Exercise Performance

6.0 ATTACHMENTS

6.1 ERO Response Category - On shift

6.2 ERO Response Category - Essential

6.3 ERO Response Category - Augmenting

6.4 ERO Response Category - Support

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ERO RESPONSE CATEGORY - ON SHIFT

<u>Title</u>	<u>Staffing Level</u>
1) Shift Manager	1 ³
2) Control Room Supervisor	1 ¹
3) Reactor Operators	2
4) Equipment Operators	2
5) STA Function	1 ^{1,5}
6) Control Room ENS Communicator	1 ⁴
7) SCC Duty Officer	1
8) Security Responder	1 ²
9) HP Technician (in plant surveys)	1
10) HP Technicians (protective actions)	2
11) Chemistry Technician	1
12) Electrical Maintenance/I&C Support	1 ²
13) Mechanical Maintenance/Rad Waste Operator	1 ²
14) Fire Brigade (fire fighting)	Per FSAR Section 13
15) First Aid and Rescue	2

¹ On shift as required by Technical Specifications in Modes 1, 2, and 3. Available within 60 minutes for call in for Modes 4 and 5.

² May be provided by shift personnel assigned other functions.

³ Shift Manager initially assumes the responsibility for emergency direction and control, then is relieved by the TSC Manager or EOF Manager.

⁴ Duties of the ENS Communicator are assumed by an individual designated by the Shift Manager.

⁵ The STA function is that of Engineering Technical Oversight and additionally the support of Emergency Plan Implementing activities (i.e., classifications, notifications, protective action recommendations, and dose assessment). The Engineering Technical Oversight function may be performed by a qualified individual staffing SM, CRS or SSS position. Support of Emergency Plan Implementing activities shall be performed by a qualified Incident Advisor if the Engineering Technical oversight function is provided by the SM, CRS or SSS. When the Engineering Technical Oversight function is provided by either the SM or CRS, another SRO is required to be on shift to perform duties as the Emergency Response SRO.

Attachment 6.1

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ERO RESPONSE CATEGORY - ESSENTIAL

NOTE: Essential Category personnel listed here are additional personnel to augment on-shift capability.

<u>Title</u>	<u>Staffing Level</u>
1) OSC Manager	1
2) OSC HP Lead	1 ⁶
3) OSC Chemistry Technician	1
4) OSC Mechanic/Rad Waste Operator	2
5) OSC Electrician/I&C Technician	3
6) OSC Health Physics Technician	5
7) TSC Manager	1
8) TSC Operations Manager	1
9) TSC Radiation Protection Manager	1
10) TSC Core Thermal Engineer	1
11) TSC Technical Manager	1
12) TSC Mechanical Engineer	1
13) TSC Electrical Engineer	1
14) TSC Plant/NRC Liaison	1
15) EOF Manager	1
16) EOF Radiological Emergency Manager	1
17) EOF Field Team Members	6
18) EOF Field Team Coordinator	1
19) EOF Telecommunications Manager	1
20) JIC Manager	1

⁶ One of the credited six Health Physics Technicians, available within 60 minutes.

Attachment 6.2

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ERO RESPONSE CATEGORY - AUGMENTING

NOTE: Augmenting Category personnel listed here are additional personnel to augment on-shift and Essential Category personnel.

<u>Title</u>	<u>Staffing Level</u>
1) Control Room Information Coordinator	1
2) OSC Information Coordinator	1
3) OSC Repair Team Coordinator	1
4) OSC Electrical Lead	1
5) OSC I&C Lead	1
6) OSC Mechanical Lead	1
7) OSC Team Tracker	1
8) TSC Maintenance Manager	1
9) TSC Plant Admin Manager	1
10) TSC Chemistry/Effluent Manager	1
11) TSC Information Coordinator	1
12) Assistant EOF Manager	1
13) EOF Manager's Secretary	1
14) EOF Site Support Manager	1
15) EOF Manpower Scheduler	1
16) EOF Engineering Manager	1
17) EOF Security Manager	1
18) EOF Radiation Detection Systems Engineer	1
19) EOF Dose Projection Health Physicist	1
20) EOF Information Coordinator	1
21) Energy Northwest Representatives to the County EOCs	2
22) Assistant JIC Manager	2
23) JIC Media Coordinator	1
24) JIC Support Manager	1
25) EOF PIO	1
26) Designated Site One Authority (DSA)	1

Attachment 6.3

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ERO RESPONSE CATEGORY - SUPPORT

NOTE: Positions listed are called in, unless noted. Support Category personnel listed here are additional personnel to augment On-Shift, Essential, and Augmenting Category personnel.

<u>Title</u>	<u>Staffing Level</u>
1) TSC Administrative Support	2
2) TSC Manager's Secretary	1
3) TSC/OSC Communicator	1
4) TSC Computer Engineer	1
5) EOF Technical Support	1
6) EOF PDIS Analyst	1
7) EOF State/County Technical Liaison	1
8) Energy Northwest Representative to the State	1
9) EOF Administrative Support	3
10) EOF INPO Network Coordinator	1
11) EOF Field Team Dispatcher	1
12) JIC Information Manager	1
13) JIC Spokesperson	1
14) JIC Technical Spokesperson	1
15) JIC HP Spokesperson	1
16) JIC News Release Editor	1
17) JIC Distribution Team Supervisor	1
18) JIC Distribution Team Members	3
19) JIC Phone Team Supervisor	2
20) JIC Media Phone Team Members	4
21) JIC Public Phone Team Members	4
22) JIC Audio/Visual	1
23) JIC Receptionist	1
24) JIC Secretary	1

Attachment 6.4

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